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Mr. David C. Childs  
Office of Federal Procurement Policy  
Office of Management and Budget  
725 17<sup>th</sup> Street NW  
New Executive Office Building, Room 9013  
Washington D.C. 20503

Dear Mr. Childs,

I am writing to comment on the Federal Register notice entitled "Performance of Commercial Activities". I'm surprised OMB didn't title this announcement "Bashing the Civil Servant Once Again", or "Robbing Half the Federal Workforce of Their Benefits". I think OMB's proposal stinks. It stinks of ignorance because it can't do simple math. It tries to fool the public into forgetting that the federal workforce is a non-profit organization, and forgetting that the private sector is driven by profit (often accompanied by a large dose of greed which tends to give us such disasters such as Enron and Arthur Anderson). It stinks because it adds dozens of new bureaucratic burdens to an already overburdened federal worker, while the President kicks the federal worker in the leg, yelling at them for all the media to hear, "move faster, faster, faster".

When the Corps of Engineers proposes a new major activity it must outline a cost-benefit analysis. Somehow OMB dodges that wise requirement in this proposal. I ask that OMB tally up the cost of all the new bureaucratic requirements (in staff time that could have been spent on agency mission), and compare it to the imagined and exaggerated benefits OMB is so sure will come from their new burdens. New requirements (also known as Washington directed work slow downs) mentioned in the Federal Register notice include: "Develop a performance work statement"; "Create a management plan"; "Establish an in-house government cost estimate"; "Issue a solicitation"; "Identify the best offer...and compare..."; "Make award"; "...submit annual inventories..."; and "Agencies will be required to establish a program office responsible for the daily implementation and enforcement of the Circular". The notice states, "Conducting a cost comparison can be time consuming and complex. In-house providers often lack the training and technical support needed to develop management plans, solicitations, or... cost estimates." So the taxpayer can better assess this proposal, OMB needs to do a cost estimate of what all these new duties for federal workers will cost the taxpayer. All these new duties take the federal worker away from what they were hired to do. And yet the President says his idea will save the taxpayer money - it simply is not true.

No workforce has been directed to change horses in the middle of the stream more often than the federal workforce. Every 2-4 years a new major emphasis is delivered out of Washington that not only bashes federal workers in the media for being too numerous and inefficient, but also tells them that they've been doing it all wrong. It directs them to get off their horse once again, change riders, and jump on a new horse. Then the President publicly mocks the federal worker for not crossing the river as fast as the private sector who had one rider and one horse.

This proposal amounts to a slap in the face to the civil servant. Civil servants are willing to accept a lower salary than their private sector peers because they believe in what they are doing, whether it be helping a war veteran, or restoring a damaged resource in one of our national parks. Civil servants accept this lesser salary and only ask to be provided with a fair benefits and retirement package. This Federal Register notice is basically an announcement by the President that he wants half of the civil servants to be fired so they won't be receiving benefits anymore. And to top it off the President has the gall to say it will "lower costs for taxpayers and improve program performance to citizens". This proposal will only improve profits to contractors and rob the public of a more dedicated, more efficient (if only unburdened by Washington requirements), and less costly, workforce; a workforce that currently retains a vast institutional knowledge. If half of these workers are let go, all that knowledge will go with them. It is a huge mistake to cause such a large scale and immediate brain drain from the federal workforce. The media splash that came with this proposal and carried headlines of laying off half of the federal workforce certainly scared away many talented and intelligent workers that had been considering a federal career choice.

Was the release of this Federal Register Notice deliberately timed to come after the November election? Did President Bush know that 850,000 federal workers would have voted differently if they would have known their boss was intending to fire them? Five days after this notice made headlines, another story bragged about how the "Feds finish taking over airport security". Ironic, isn't it that the Congress was so concerned about improving airport security that they wanted federal workers to take it over from the private sector? A traveler was quoted as saying about the new federal workers, "It seems that they are a little more efficient and certainly more customer friendly."

If OMB and the President intend to destroy the morale of 850,000 workers dedicated to serving their country, this is the way to do it. If Washington wants to make the federal workforce more efficient, they just need to leave the agency budgets flat for a few years. Cost of living increases will slowly decrease the workforce, vacant positions will go unfilled, and managers will find ways to squeeze every dollar for maximum benefit to the mission. This option is the no cost, and no new red tape option, and will much more quickly accomplish what the expensive and time-consuming "Performance of Commercial Activities" proposal intends to do.

Sincerely,



Robert M. Daum



Diane M. Daum