

December 3, 2010
Federal Salary Council
1900 E Street NW.
Washington, DC 20415-8200

**MEMORANDUM FOR: THE PRESIDENT'S PAY AGENT
HONORABLE HILDA L. SOLIS
HONORABLE JACOB J. LEW
HONORABLE JOHN BERRY**

**SUBJECT: Level of Comparability Payments for January 2012 and Other
Matters Pertaining to the Locality Pay Program**

As authorized by the Federal Employees Pay Comparability Act of 1990 (FEPCA), we present our recommendations for the establishment or modification of pay localities, the coverage of salary surveys conducted by the Bureau of Labor Statistics (BLS) for use in the locality pay program, the process of comparing General Schedule (GS) pay to non-Federal pay, and the level of comparability payments for January 2012.

Bureau of Labor Statistics (BLS) Surveys and Pay Gap Methodology

We reviewed comparisons of GS and non-Federal pay calculated using BLS salary survey data collected under the National Compensation Survey (NCS) program and pay comparisons using a model developed by BLS for using Occupational Employment Statistics (OES) data in the locality pay program. All of the pay gaps (percentage difference between base GS rates and non-Federal pay for the same levels of work) were calculated using the same general weighting and aggregation methods in use since 1994. The BLS survey data, both OES and NCS, cover establishments of all employment sizes.

NCS Survey Results

NCS data this year include all of the survey improvements designed for the program, including about 80 percent of the data leveled using the four-factor grade leveling system. BLS continues to phase in the grade leveling system and the phase in will be completed by the data delivery in 2011. BLS also provided NCS data both with and without incentive pay. In 2008 and 2009, incentive pay data were controversial because of a pay anomaly in the Rest of U.S. (RUS) survey. The anomaly is no longer in the RUS data, but OPM staff found a similar anomaly in the Miami survey data this year. As we stated in 2008 and 2009, the Council believes the data should be used as is. If "full" comparability with the non-Federal sector had been achieved, as contemplated in the pay statute, the Council would be more concerned about the potential instability to the pay gap measures introduced by this incentive pay. However, since we are far from full comparability and never implement the rates indicated by survey results, we do not believe this data anomaly is a critical issue.

OES Survey Results

BLS also provided another set of pay data using a model they developed to estimate the impact of work level on salary so that OES data could be used in the locality pay program. BLS' model uses how salaries change from the occupational average by work level in NCS data to estimate salaries by work level using OES occupational average salaries. The model can be applied to locations where BLS has not conducted a survey under NCS.

We reviewed OES test data for several years for the 32 existing locality pay areas, Anchorage and Honolulu, Charlotte, Louisville, New Orleans, Guam, Puerto Rico, the U.S. Virgin Islands, and nine other locations that had contacted the Federal Salary Council in prior years.

Attachment 1 shows 2010 or in some cases 2009 pay gaps using both the NCS and OES methods. For the 32 current locality pay areas, the OES pay gaps are 0.97 points lower, on average. However, this average masks significant differences in individual areas. For example, the Miami gap is 10.45 points lower using OES than NCS. This is likely due in part to high incentive pay in the NCS survey. Likewise, the San Diego pay gap is 11.28 points higher using the OES model. We plan explore these differences in more detail next year.

Locality Rates for 2012

We recommend using the NCS survey results this year for the 32 continuing locality pay areas. Since we have the NCS data and it represents the accepted methodology, there is no reason to switch over this year. Most of the Council members are newly appointed, and we have had less than a month to review the OES model. Deferring the general use of the OES model will give us an additional year to review the model before applying it in existing locality pay areas. BLS anticipates it can deliver NCS data in 2011 regardless of when the shift to OES occurs because much of the data have already been collected or are in the pipeline.

Based on OPM staff's calculations, in taking a weighted average of the NCS locality pay gaps as of March 2010, the overall gap between base GS average salaries (excluding any add-ons such as special rates and existing locality payments) and non-Federal average salaries surveyed by BLS in the 32 continuing locality pay areas was 48.92 percent. The amount needed to reduce the pay disparity to 5 percent (the target gap) averages 41.83 percent for the 32 continuing locality pay areas. Including locations we propose as new locality pay areas and the nonforeign areas changes the average pay gap to 48.86 percent and the average target pay gap to 41.77 percent.

Under 5 U.S.C. 5304(a)(3)(I), after the 9-year phase-in period, the percentage of comparability payments due in January 2002 and any year thereafter may not be less than the full amount of the target gap. Therefore, we recommend overall average locality rates of 41.77 percent for 2012. We cannot calculate the percentage increase over the average of the rates authorized for 2011 at

this time because the 2011 rates have not yet been set. The proposed comparability payments for 2012 for each existing locality pay area and proposed additional areas) are shown in **Attachment 2**.

These locality rates would be in addition to the 1.1 percent increase in General Schedule base rates under 5 U.S.C. 5303(a). This provision calls for increases in basic pay equal to the percentage increase in the Employment Cost Index, wages and salaries, private industry workers, between September 2009 and September 2010, less half a point. The ECI increased 1.6 percent in September 2010.

Surveys in New Cities

Last year we asked BLS if it had enough data from its NCS survey to produce data for six locations in RUS. These locations were selected from a listing of areas currently in RUS with more than 2,500 GS employees, a large non-Federal workforce, and above average pay relatives as measured by data compiled by the Economic Research Institute. We had also been monitoring Louisville. BLS supplied NCS data for Charlotte, Louisville, and New Orleans but did not have sufficient data for Albany, Fresno, Las Vegas, or Madison. The NCS pay gaps for these three cities and the RUS locality pay area are shown in the table below.

2010 NCS Pay Gaps		
Location	Compared to non-Federal pay	Compared to RUS
Charlotte, NC	46.04%	+15.09 points
Louisville, KY	33.00%	+ 2.05 points
New Orleans, LA	38.80%	+ 7.85 points
RUS	30.95%	

The pay gaps based on NCS data in Charlotte and New Orleans are well above that for the RUS locality pay area while Louisville, as it has been for the last several years, is just above RUS. OPM staff also asked BLS to produce data for these locations using the OES model.

2010 OES Pay Gaps		
Location	Compared to non-Federal pay	Compared to RUS
Charlotte, NC	42.99%	+14.85 points
Louisville, KY	23.90%	- 4.24 points
New Orleans, LA	26.68%	- 1.46 points
RUS	28.14%	

Using OES data, the pay gap for Charlotte is well above that for the RUS locality pay area while the other two locations are below RUS.

Since Charlotte is well above the RUS pay gap using either methodology, we recommend that Charlotte be made a separate locality pay area, but that Louisville, which is below RUS or just above it, and New Orleans, which is below RUS with OES data which probably represents our future survey source, remain in the RUS locality pay area. Note that we recommend Charlotte be established using the OES data because it is based on a much larger establishment sample and the OES program represents the future for locality pay.

Requests to be Included in Existing Pay Areas or to Establish New Locality Pay Areas

OPM staff had contacts from employees in 24 locations by email, telephone, or letter since 2009:

Albany, NY	Aspen, CO	Atlantic City, NJ
Austin, TX	Berkshire County, MA	Bloomington, IN
Charlotte, NC	Clallam and Jefferson Counties, WA	Cochise County, AZ
Colorado Springs, CO	Kern County, CA	Las Vegas, NV
Louisville, KY	Mono County, CA	Nashville, TN
New Orleans, LA	Orlando, FL	Richmond, VA
Polk County, TX	Portland, ME	San Antonio, TX
San Luis Obispo County, CA	Tampa, FL	Virginia Beach, VA

We also received detailed letters or petitions from employees or groups representing Albany, NY; Atlantic County, NJ; Berkshire County, MA; Clallam and Jefferson Counties, WA; and Mono County, CA. Employees from several of these locations provided oral testimony at our meetings of October 29 and November 19. In summary, employees in Albany requested it be made a separate locality pay area, employees in Atlantic County requested to be moved from the Philadelphia to the New York locality pay area, employees in Berkshire County requested being included in the Hartford locality pay area, employees in Clallam and Jefferson Counties requested the counties be considered as a unit, and employees in Mono County (Marine Corps Mountain Warfare Training Center) requested being included in the Sacramento locality pay area.

None of these locations meet the current criteria to be included in an existing locality pay area and there are no plans or resources to expand the number of locations surveyed by BLS as separate locality pay areas under the NCS program. Accordingly, we recommend no action on these locations with the exception of the five locations shown in bold above which are impacted by our recommendations on the following pages.

Occupational Employment Statistics Data in Other Areas

BLS has been studying how Occupational Employment Statistics (OES) data might be used in the locality pay program. These data represent a much larger sample of non-Federal employers and cover more metropolitan areas than available under the National Compensation Survey (NCS) program. BLS has developed a model for estimating pay gaps by pooling NCS data with

OES data. BLS briefed the Council on its model at the October 29, 2010, meeting. As part of its research, BLS produced pay gaps for several years for a number of locations that had contacted the Council in the past. The OES pay gaps for 2009 are listed in the table below.

2009 OES Pay Gaps in Selected Locations		
Location	Compared to non-Federal pay	Compared to RUS
Albany, NY	39.18%	+11.51 points
Albuquerque, NM	36.68%	+ 9.01 points
Bakersfield, CA	58.97%	+31.30 points
Beaumont, TX	16.86%	-10.81 points
Harrisburg, PA	37.20%	+ 9.53 points
Lansing, MI	39.26%	+11.59 points
New Orleans, LA	28.30%	+ 0.63 points
Portland, ME	32.81%	+ 5.14 points
Wilmington, NC	18.01%	- 9.66 points
Rest of U.S. (2009 gap)	27.67%	

The pay gaps in Albany, Albuquerque, Bakersfield, Harrisburg, Lansing, and Portland are more than 5 percentage points higher than the RUS gap in 2009 and in BLS test results for 2007 and 2008. Since we do not have NCS data for these locations, and we are unlikely to ever have NCS data for them, we recommend the use of the 2009 OES data to establish new locality pay areas for five of these locations in 2012. (Lansing should be added to the Detroit locality pay area under our next recommendation). We plan to recommend a systematic process for selecting areas currently in the RUS locality pay area for evaluation using the OES model in the future and have instructed our Working Group to continue to study this issue. There are about 20,000 GS employees in these five locations. If these locations are made separate locality pay areas, OPM staff should adjust the RUS pay gap as we have done in the past to reflect this change as shown in **Attachment 2**.

We also recommend that the locations listed below that might be affected by these new locality pay areas remain in their current locality pay area.

- Edwards Air Force Base, in Kern County, CA, could be included in the proposed Bakersfield locality pay area, except it's already part of the Los Angeles locality pay area
- Adams and York Counties, PA, have a closer economic linkage with the proposed Harrisburg locality pay area (14.11 percent employment interchange), except they are already included in the Washington, DC, locality pay area (10.74 percent employment interchange)
- Five townships in York County, ME, are part of the Portland, ME, CSA, except they are already included in the Boston locality pay area
- Warren County, NJ, is part of the Allentown MSA which we recommend be added to the

Philadelphia locality pay area, except Warren County is already retained as part of the New York locality pay area

Since employees in these locations already receive higher locality pay than they would receive in the proposed areas, and because we have no legal authority for employees to retain a locality pay rate when moved to a lower paying area, the Council concludes these locations should remain in their respective current locality pay area.

Criteria for Areas of Application

We also reviewed the current criteria for adding adjacent locations to an existing locality pay area. We previously recommended these criteria, the Pay Agent approved them, and they have been modified over the years. The current criteria are based on the number of employees covered by the General Schedule pay system and the level of commuting to/from the adjacent area and the MSA/CSA comprising the locality pay area.

We believe that commuting is the most relevant criterion and measures the degree of economic linkage among areas. The GS employment criterion has always been problematic and hard to justify because it is not based on an economic linkage among geographic locations. We recommend the GS criteria be dropped from both the metropolitan area criteria and the individual county criteria. GS employment continues to be useful for evaluating Federal facilities that cross pay area boundaries and should be retained in the facility criteria.

Under this proposal, we would continue to use a threshold of 7.5 percent employment interchange rate for evaluating adjacent metropolitan and combined statistical areas for inclusion in an adjacent locality pay area. We also recommend adopting a new single county commuting criterion of 20 percent for evaluating adjacent counties that are not part of a multi-county MSA or CSA. This is a change from the current level of 7.5 percent. This recommendation would move about 5,100 GS employees in 15 metropolitan areas and about 3,500 GS employees in 83 counties into an existing locality pay area. The affected areas are listed in **Attachments 3 and 4**. Note that we recommend Lansing, MI, be added to the Detroit locality pay area in lieu of being made a separate locality pay area. There are also a few additional locations that would qualify to be added to proposed new locality pay areas that are also shown in the attachment, bringing the total to about 10,000 GS employees. We have asked our Working Group to continue its review of the criteria next year when we have more time to consider options.

The Claremont CSA (White River Junction, VT) is composed of four counties (Orange County, VT; Windsor County, VT (White River Junction); and Grafton and Sullivan Counties, NH) in two micropolitan areas. It does not contain any metropolitan areas. The Pay Agent stated it would not use micropolitan areas in the locality pay program unless associated with a metropolitan area. (A metropolitan area includes at least one urbanized area with a population of 50,000 or more. A micropolitan area includes at least one urbanized area with a population of at least 10,000 but less than 50,000.) If considered as a CSA, the entire Claremont CSA would pass the new criteria to be included in the Boston locality pay area. None of the four counties pass the recommended single county criterion. We recommend that Claremont be treated as a

CSA and added to the Boston locality pay area regardless of whether or not the area contains a metropolitan statistical area.

Locality Pay in Nonforeign Areas

The Non-Foreign Area Retirement Equity Assurance Act of 2009 (the Act) extended locality pay to the “non-foreign” areas. The Pay Agent issued an interim regulation on September 30, 2010, making Alaska and Hawaii separate whole-State locality pay areas and adding American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, the U.S. Virgin Islands, and U.S. territories and possessions to the Rest of U.S. locality pay area. The Pay Agent concluded Alaska and Hawaii should be separate areas based on NCS salary surveys in Anchorage and Honolulu that show higher non-Federal pay levels than in the RUS area and a sense of Congress contained in the Act that Alaska and Hawaii should be separate whole-State areas. BLS does not conduct surveys under NCS in any of the other “non-foreign” areas. The Council concurs with the Pay Agent’s action to make Alaska and Hawaii separate whole-State locality pay areas and include the other areas in the RUS locality pay area.

BLS does include Guam, Puerto Rico, and the U.S. Virgin Islands under the OES program and applied its OES model to these locations. The results are included in **Attachment 2**. Based on the OES model, non-Federal pay levels in these locations are below those in the RUS area. However, since RUS is an average, it is likely about half of RUS is also below the average. Our policy in the past has been that the RUS locality rate should be the floor; no location should receive less than the RUS rate. We believe this is a good policy and should continue and apply to Guam, Puerto Rico, and the U.S. Virgin Islands.

Summary of Locality Pay Areas for 2012

In summary, the Council recommends retaining the 32 existing locality pay areas, adding Alaska and Hawaii as separate whole-State locality pay areas, including the other non-foreign areas in the RUS locality pay area, creating new locality pay areas for Albany, Albuquerque, Bakersfield, Charlotte, Harrisburg, and Portland, and amending the criteria for evaluating areas adjacent to existing locality pay areas for inclusion in the pay area with results as shown in **Attachments 3 and 4**.

By direction of the Council:

SIGNED

Stephen E. Condrey, Ph.D.
Chairman

Attachments

March 2010 NCS Pay Gaps Versus March 2010 OES Pay Gaps

Pay Area	March 2010 Base GS Payroll	March 2010 NCS Pay Gap	March 2010 OES Pay Gap	Difference (NCS Minus OES)
ATLANTA	\$1,603,831,519	46.13%	43.42%	2.71%
BOSTON	\$1,430,398,801	56.51%	56.02%	0.49%
BUFFALO	\$281,141,991	36.66%	40.23%	-3.57%
CHICAGO	\$1,279,907,995	55.67%	53.68%	1.99%
CINCINNATI	\$452,162,725	39.58%	37.15%	2.43%
CLEVELAND	\$587,542,885	41.79%	38.42%	3.37%
COLUMBUS	\$519,827,149	40.77%	38.19%	2.58%
DALLAS	\$1,108,705,828	49.14%	46.12%	3.02%
DAYTON	\$441,903,636	35.93%	37.60%	-1.67%
DENVER	\$1,161,002,896	49.94%	58.19%	-8.25%
DETROIT	\$767,161,978	46.92%	52.23%	-5.31%
HARTFORD	\$238,243,815	61.56%	56.04%	5.52%
HOUSTON	\$849,735,807	50.62%	53.12%	-2.50%
HUNTSVILLE	\$613,216,337	45.65%	44.72%	0.93%
INDIANAPOLIS	\$454,025,772	35.64%	29.65%	5.99%
LOS ANGELES	\$1,986,322,608	58.02%	66.33%	-8.31%
MIAMI	\$780,009,664	51.10%	40.65%	10.45%
MILWAUKEE	\$207,353,520	38.72%	40.83%	-2.11%
MINNEAPOLIS	\$426,685,914	51.92%	47.67%	4.25%
NEW YORK	\$2,955,210,952	65.62%	65.21%	0.41%
PHILADELPHIA	\$1,585,702,842	49.83%	52.85%	-3.02%
PHOENIX	\$508,208,831	43.93%	39.77%	4.16%
PITTSBURGH	\$389,777,696	35.13%	35.35%	-0.22%
PORTLAND	\$593,809,297	51.69%	43.89%	7.80%
RALEIGH	\$672,809,520	35.38%	35.29%	0.09%
REST OF U.S.	\$26,769,013,616	30.95%	28.14%	2.81%
RICHMOND	\$472,855,454	34.98%	34.64%	0.34%
SACRAMENTO	\$378,294,273	54.55%	49.76%	4.79%
SAN DIEGO	\$989,754,370	56.40%	67.68%	-11.28%
SAN FRANCISCO	\$1,478,283,565	72.55%	82.41%	-9.86%
SEATTLE	\$1,308,633,900	52.85%	54.80%	-1.95%
WASHINGTON DC	\$17,368,516,445	71.60%	70.40%	1.20%
Total/Averages	\$70,660,051,601	48.92%	47.95%	0.97%

**March 2010 Pay Gaps Using Occupational Employment Statistics Data
Additional Areas**

AREA	March 2010 NCS Pay Gap	OES Pay Gap	Which OES Survey
ALBANY	N/A	39.18%	2009
ALBUQUERQUE	N/A	36.68%	2009
ANCHORAGE	55.39%	53.99%	2010
BAKERSFIELD	N/A	58.97%	2009
CHARLOTTE	46.04%	42.99%	2010
GUAM	N/A	-0.46%	2010
HARRISBURG	N/A	37.20%	2009
HONOLULU	39.34%	39.19%	2010
LANSING	N/A	39.26%	2009
LOUISVILLE	33.00%	23.90%	2010
NEW ORLEANS	38.80%	26.68%	2010
PORTLAND ME	N/A	32.81%	2009
PUERTO RICO	N/A	-15.31%	2010
VIRGIN ISLANDS	N/A	15.24%	2010

Locality Pay Rates for 2012--Including COLA Areas (Payroll Estimates Include Recommended Additional Areas of Application)				
Locality Pay Area	March 2010 Base GS Payroll	2010 Pay Gap	Survey and Year	Target Pay Gap and 2012 Loc rate
ALASKA	\$385,913,005	55.39%	NCS 2010	47.99%
ALBANY	\$158,143,359	39.18%	OES 2009	32.55%
ALBUQUERQUE	\$461,860,843	36.68%	OES 2009	30.17%
ATLANTA	\$1,657,467,034	46.13%	NCS 2010	39.17%
BAKERSFIELD	\$39,617,308	58.97%	OES 2009	51.40%
BOSTON	\$1,444,894,300	56.51%	NCS 2010	49.06%
BUFFALO	\$281,392,124	36.66%	NCS 2010	30.15%
CHARLOTTE	\$163,106,468	42.99%	OES 2010	36.18%
CHICAGO	\$1,290,663,764	55.67%	NCS 2010	48.26%
CINCINNATI	\$453,863,536	39.58%	NCS 2010	32.93%
CLEVELAND	\$600,579,479	41.79%	NCS 2010	35.04%
COLUMBUS	\$534,877,120	40.77%	NCS 2010	34.07%
DALLAS	\$1,112,544,355	49.14%	NCS 2010	42.04%
DAYTON	\$442,106,459	35.93%	NCS 2010	29.46%
DENVER	\$1,161,002,896	49.94%	NCS 2010	42.80%
DETROIT	\$843,365,682	46.92%	NCS 2010	39.92%
HARRISBURG	\$289,451,134	37.20%	OES 2009	30.67%
HARTFORD	\$238,243,815	61.56%	NCS 2010	53.87%
HAWAII	\$454,651,322	39.34%	NCS 2010	32.70%
HOUSTON	\$852,972,720	50.62%	NCS 2010	43.45%
HUNTSVILLE	\$619,259,754	45.65%	NCS 2010	38.71%
INDIANAPOLIS	\$473,387,896	35.64%	NCS 2010	29.18%
LOS ANGELES	\$1,986,322,608	58.02%	NCS 2010	50.50%
MIAMI	\$805,473,933	51.10%	NCS 2010	43.90%
MILWAUKEE	\$214,401,507	38.72%	NCS 2010	32.11%
MINNEAPOLIS	\$449,297,402	51.92%	NCS 2010	44.69%
NEW YORK	\$2,956,447,096	65.62%	NCS 2010	57.73%
OTHER NONFOREIGN AREAS	\$403,526,846	30.95%	NCS 2010	24.71%
PHILADELPHIA	\$1,599,409,780	49.83%	NCS 2010	42.70%
PHOENIX	\$508,208,831	43.93%	NCS 2010	37.08%
PITTSBURGH	\$394,262,818	35.13%	NCS 2010	28.70%
PORTLAND ME	\$49,023,364	32.81%	OES 2009	26.49%
PORTLAND OR	\$597,016,001	51.69%	NCS 2010	44.47%
RALEIGH	\$680,437,680	35.38%	NCS 2010	28.93%
REST OF U.S.	\$25,281,818,278	30.60%	NCS 2010	24.38%
RICHMOND	\$483,852,514	34.98%	NCS 2010	28.55%
SACRAMENTO	\$382,312,017	54.55%	NCS 2010	47.19%
SAN DIEGO	\$989,754,370	56.40%	NCS 2010	48.95%
SAN FRANCISCO	\$1,478,283,565	72.55%	NCS 2010	64.33%
SEATTLE	\$1,311,065,661	52.85%	NCS 2010	45.57%
WASHINGTON DC	\$17,373,864,131	71.60%	NCS 2010	63.43%
Averages with COLA areas	\$71,904,142,775	48.86%		41.77%

Calculation of Adjusted RUS Gap Removing Proposed New Areas from RUS		
Area	Area Payroll	Pay Gap
RUS	\$26,443,020,754	30.95%
ALBANY	\$158,143,359	39.18%
ALBUQUERQUE	\$461,860,843	36.68%
BAKERSFIELD	\$39,617,308	58.97%
CHARLOTTE	\$163,106,468	42.99%
HARRISBURG	\$289,451,134	37.20%
PORTLAND ME	\$49,023,364	32.81%
Adjusted RUS	\$25,281,818,278	30.60%

Multi-County Metropolitan Areas Added to Existing Locality Pay Areas under Proposed Criteria

LOCALITY PAY AREA	ADJACENT METROPOLITAN AREA	COMMUTING INTERCHANGE RATE	GS EMP AVG Sep 09 to Jun 10
Atlanta	Athens-Clarke County, GA Metropolitan Statistical Area	15.31%	740
Boston	Claremont-Lebanon, NH-VT Combined Statistical Area	8.90%	873
Chicago	Rockford-Freeport-Rochelle, IL Combined Statistical Area	9.16%	195
Cleveland	Canton-Massillon, OH Metropolitan Statistical Area	20.21%	196
Columbus	Mansfield-Bucyrus, OH Combined Statistical Area	10.68%	200
Detroit	Lansing-East Lansing-Owosso, MI Combined Statistical Area	9.90%	810
Detroit	Saginaw-Bay City-Saginaw Township North, MI Combined Statistical Area	8.59%	632
Huntsville	Florence-Muscle Shoals, AL Metropolitan Statistical Area	10.33%	116
Indianapolis	Bloomington, IN Metropolitan Statistical Area	10.91%	89
Indianapolis	Kokomo-Peru, IN Combined Statistical Area	11.99%	297
Milwaukee	Fond du Lac-Beaver Dam, WI Combined Statistical Area	15.00%	94
Philadelphia	Allentown-Bethlehem-Easton, PA-NJ Metropolitan Statistical Area	10.20%	286
Pittsburgh	Steubenville-Weirton, OH-WV Metropolitan Statistical Area	12.52%	25
Raleigh	Rocky Mount, NC Metropolitan Statistical Area	9.32%	44
Miami	Port St. Lucie-Sebastian-Vero Beach, FL Combined Statistical Area	11.60%	488
Total			5,085

Multi-County Metropolitan Areas Added to Proposed Locality Pay Areas under Proposed Criteria

LOCALITY PAY AREA	ADJACENT METROPOLITAN AREA	COMMUTING INTERCHANGE RATE	GS EMP AVG Sep 09 to Jun 10
Albuquerque	Santa Fe-Espanola, NM Combined Area	11.68%	902
Charlotte	Hickory-Lenoir-Morganton, NC Metropolitan Statistical Area	10.98%	117
Total			1,019

Single Counties Added to Existing Locality Pay Areas under Proposed 20% Criterion

LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTING INTERCHANGE RATE	Pop Density Persons Per Square Mile 2000 Census	GS EMP AVG Sep 09 to Jun 10
Atlanta	13011	Banks Co. GA	38.24%	61.7	1
Atlanta	01029	Cleburne Co. AL	37.02%	25.2	24
Atlanta	13115	Floyd Co. GA	20.85%	176.5	75
Atlanta	13123	Gilmer Co. GA	29.49%	55	29
Atlanta	13137	Habersham Co. GA	21.11%	129.1	36
Atlanta	13157	Jackson Co. GA	53.24%	121.5	26
Atlanta	13187	Lumpkin Co. GA	62.18%	73.9	25
Atlanta	13211	Morgan Co. GA	54.18%	44.2	3
Atlanta	01111	Randolph Co. AL	40.04%	38.5	3
Atlanta	13263	Talbot Co. GA	45.96%	16.5	0
Atlanta	13311	White Co. GA	39.33%	82.6	2
Boston	33003	Carroll Co. NH	25.59%	46.8	48
Buffalo	36121	Wyoming Co. NY	39.01%	73.2	8
Chicago	17075	Iroquois Co. IL	32.38%	28.1	9
Chicago	18149	Starke Co. IN	27.25%	76.2	1
Cincinnati	39001	Adams Co. OH	30.12%	46.8	2
Cincinnati	39071	Highland Co. OH	40.07%	73.9	24
Cincinnati	21187	Owen Co. KY	31.27%	30	3
Cincinnati	18137	Ripley Co. IN	53.72%	59.4	4
Cincinnati	18155	Switzerland Co. IN	46.97%	41	3
Cincinnati	18161	Union Co. IN	31.30%	45.5	0
Cleveland	39169	Wayne Co. OH	24.43%	200.9	74
Columbus	39073	Hocking Co. OH	48.27%	66.8	1
Columbus	39091	Logan Co. OH	24.02%	100.4	42
Columbus	39127	Perry Co. OH	50.91%	83.2	4
Columbus	39131	Pike Co. OH	32.26%	62.7	21
Columbus	39163	Vinton Co. OH	30.21%	30.9	2
Dallas	40013	Bryan Co. OK	27.74%	40.2	22
Dallas	48217	Hill Co. TX	29.16%	33.6	19
Dallas	48237	Jack Co. TX	34.86%	9.6	3
Dallas	48337	Montague Co. TX	34.23%	20.5	9
Dallas	48349	Navarro Co. TX	27.17%	44.8	20
Dallas	48379	Rains Co. TX	53.91%	39.4	0
Dallas	48467	Van Zandt Co. TX	46.36%	56.7	10
Dayton	39149	Shelby Co. OH	28.52%	117.1	7
Detroit	26151	Sanilac Co. MI	39.09%	46.2	9
Detroit	26157	Tuscola Co. MI	24.74%	71.7	21
Houston	48089	Colorado Co. TX	23.21%	21.2	9
Houston	48185	Grimes Co. TX	31.74%	29.7	4
Houston	48313	Madison Co. TX	25.78%	27.6	1
Houston	48373	Polk Co. TX	27.94%	38.9	34

Attachment 4 Continued

LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTING INTERCHANGE RATE	Pop Density Persons Per Square Mile 2000 Census	GS EMP AVG Sep 09 to Jun 10
Houston	48455	Trinity Co. TX	39.81%	19.9	1
Houston	48481	Wharton Co. TX	29.22%	37.8	13
Huntsville	47103	Lincoln Co. TN	27.25%	55	6
Indianapolis	18031	Decatur Co. IN	22.94%	65.9	15
Indianapolis	18045	Fountain Co. IN	21.25%	45.4	10
Indianapolis	18071	Jackson Co. IN	30.11%	81.2	8
Indianapolis	18139	Rush Co. IN	53.48%	44.7	2
Milwaukee	55055	Jefferson Co. WI	23.76%	132.9	38
Milwaukee	55127	Walworth Co. WI	25.78%	168.8	13
Minneapolis	27065	Kanabec Co. MN	37.43%	28.6	8
Minneapolis	27079	Le Sueur Co. MN	38.29%	56.7	5
Minneapolis	27093	Meeker Co. MN	54.95%	37.2	27
Minneapolis	27095	Mille Lacs Co. MN	58.34%	38.9	3
Minneapolis	27097	Morrison Co. MN	29.66%	28.2	164
Minneapolis	27115	Pine Co. MN	32.00%	18.8	208
Minneapolis	55095	Polk Co. WI	39.27%	45	49
Minneapolis	27143	Sibley Co. MN	39.67%	26.1	4
New York	36105	Sullivan Co. NY	40.68%	76.3	30
Pittsburgh	42059	Greene Co. PA	43.62%	70.6	35
Pittsburgh	42063	Indiana Co. PA	24.45%	108.1	54
Portland OR	53015	Cowlitz Co. WA	22.17%	81.6	75
Raleigh	37077	Granville Co. NC	62.09%	91.3	1207
Raleigh	37105	Lee Co. NC	47.77%	190.6	62
Raleigh	37181	Vance Co. NC	22.08%	169.4	35
Richmond	51029	Buckingham Co. VA	22.24%	26.9	2
Richmond	51057	Essex Co. VA	34.64%	38.8	7
Richmond	51081	Greensville Co. VA	22.75%	39.1	0
Richmond	51119	Middlesex Co. VA	21.87%	76.2	0
Richmond	51135	Nottoway Co. VA	36.25%	50	194
Richmond	51147	Prince Edward Co. VA	22.26%	55.9	26
Sacramento	06003	Alpine Co. CA	55.64%	1.6	8
Sacramento	06005	Amador Co. CA	22.02%	59.2	40
Sacramento	06011	Colusa Co. CA	25.39%	16.3	40
Sacramento	06091	Sierra Co. CA	22.41%	3.7	46
Seattle	53041	Lewis Co. WA	26.54%	28.5	69
Washington DC	24011	Caroline Co. MD	20.76%	93	7
Washington DC	54031	Hardy Co. WV	21.05%	21.7	28
Washington DC	24029	Kent Co. MD	31.19%	68.7	11
Washington DC	51113	Madison Co. VA	35.37%	39	23
Washington DC	51137	Orange Co. VA	40.00%	75.7	3
Washington DC	51157	Rappahannock Co. VA	103.14%	26.2	8
Washington DC	51171	Shenandoah Co. VA	33.68%	68.5	48
Total					3,518

Single Counties Added to Proposed Locality Pay Areas under Proposed 20% Criterion

LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTING INTERCHANGE RATE	Pop Density Persons Per Square Mile 2000 Census	GS EMP AVG Sep 09 to Jun 10
Albany	36039	Greene Co. NY	45.51%	74.4	5
Albany	36041	Hamilton Co. NY	26.33%	3.1	2
Charlotte	45025	Chesterfield Co. SC	23.48%	53.6	15
Harrisburg	42067	Juniata Co. PA	28.29%	58.3	20
Portland	23015	Lincoln Co. ME	21.64%	73.7	9
Portland	23017	Oxford Co. ME	32.24%	26.3	17
Total					68