



National Association of Agriculture Employees
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November 4, 2009

Rebecca Bech
Deputy Administrator, APHIS,
Plant Protection and Quarantine
1400 Independence Ave., SW
Washington, DC 20250

Re: *CBP's GS 12 Upgrade Plans*

Dear Ms. Bech:

NAAE is extremely interested in and concerned about any plans PPQ has or is developing in response to CBP's recently announced upgrade of the journeyman level of CBP Agriculture Specialist GS 11 positions to the GS 12 pay level. The exigencies dictate that PPQ get the word out quickly regarding those plans.

NAAE's National Executive Committee has been bombarded with inquiries from our bargaining unit members regarding PPQ's response to the soon-to-become substandard pay levels of PPQ professional positions. NAAE is requesting a prompt response to all PPQ employees from your office regarding PPQ's intentions and future actions necessitated in response to the CBP promotion action. This upgrade for CBP Agriculture Specialists is already causing a severe demoralizing effect on our bargaining unit employees. The speed at which the news of the CBP upgrade has spread within the PPQ ranks speaks volumes about the concern and anxiety level of our employees, a byproduct of their close proximity to the CBP beneficiaries of this upgrade.

There is no legitimate basis or rationale for maintaining two separate journeyman levels for these two positions. PPQ GS 11s attend essentially the same training, are required to know and enforce the same regulations as the CBP Agriculture Specialist, and have greater education and experience requirements than the CBP Agriculture Specialists. PPQ GS 11s have the knowledge and skills to be able to step in and perform 90% of the CBP job, but will soon possess that potential at a lower pay grade. In addition to simmering over this obvious inequity, the PPQ GS 11s are acutely aware that a portion, if not all, of their salaries are being paid with the same User Fee dollars that are being used to pay these upgrades to CBP Agriculture Specialists. How will the CBP upgrade affect the User Fees and its allocation to both CBP and PPQ? These are just a few of the concerns that have been raised by our unit members so far.

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Please remember that Agriculture Specialists are not a fungible resource; new inspectors cannot be conjured up overnight. PPQ learned this lesson in the transfer of function in 2003. This upgrade action in CBP appears to be a response to the same lesson that CBP too had to learn. CBP has done the necessary footwork for its employees to make this classification action possible. We hope PPQ is developing a similar response.

A prompt and positive response to PPQ employees as to PPQ's intentions towards pay equity with CBP can do much to repair some of the damage that has already occurred. We look forward to your prompt reply.

Sincerely,

A handwritten signature in blue ink that reads "Sarah Rehberg". The signature is written in a cursive style.

Sarah Rehberg
NAAE National President

Cc: NAAE Executive Committee
Kim D. Mann, NAAE General Counsel
Paul Eggert, Associate Deputy Administrator
NAAE Bargaining Unit