

NEW JERSEY STATE AFL-CIO

106 West State Street
Trenton, New Jersey 08608
(609) 989-8730
FAX (609) 989-8734
www.njafclcio.org



CHARLES WOWKANECH LAUREL BRENNAN
PRESIDENT SECRETARY-TREASURER
CHARLES H. MARCIANTE
PRESIDENT EMERITUS

EXECUTIVE BOARD MEMBERS

JOYCE ALSTON	RAYMOND GREAVES	JOHN MIRANTI	ANTHONY SANTO
MICHAEL BARNES	CHARLES HALL, JR.	JUAN NEGRON	DAVID SCHNECK
JAMES R. CHEW, JR.	HERBERT HALL	JOHN T. NICCOLLA, JR.	JOHN SHINN
NOEL CHRISTMAS	JAMES KEHOE	DANIEL O'CONNELL	JOSEPH SORESI
JOSEPH DEMARK, JR.	CHRISTINE KERBER	GERALD OWENS	RICHARD SWEENEY
WYATT EARP	VINCENT LANE	STEPHEN F. PETTIT	BUDDY THOMAN
SHARON EASTWICK	DOMINICK MARINO	RAYMOND POCINO	DERRICK THOMAS
ROY FOSTER	MATTHEW McCARTY	JOHN POTTS	RICHARD TOLSON
THOMAS GIBLIN	C. ROBERT McDEVITT	HETTY ROSENSTEIN	ANN TWOMEY
SHERRYL GORDON	GERARD MEARA	TIMOTHY RUDOLPH	HARVEY WHILLE

October 16, 2014

Henry Maurer, Director
Division of Appeals and Regulatory Affairs
Civil Service Commission
44 South Clinton Avenue
PO Box 312
Trenton, NJ 08625-0312

Dear Mr. Maurer:

RE: Opposition to Proposed Amendment concerning the “Job Banding Program” as published in the August 18, 2014 NJ Register

The New Jersey State AFL-CIO continues to express our opposition to the proposed rule concerning job banding as revised. Despite recent amendments, if enacted, this regulation will take a significant step backwards in regard to ensuring that public employee promotions are based upon merit, and not political favoritism. This proposed rule gives management wide latitude in determining which public employees gets promoted and eliminates test-based promotions.

Despite numerous amendments, the proposed rule ignores important information detailing what type of criteria is going to be used to develop the bands. The rule only speaks to this in the broadest of terms and it is unclear how these bands will be developed. Furthermore, we need certain questions answered such as how many examinations there would be in a particular appointing authority and then how this would be impacted if titles are banded. What type of impact would this have on employees is an important question that the Civil Service Commission refuses to answer.

The New Jersey State AFL-CIO asks you to forgo the implementation of this new regulation.

Sincerely,

Charles Wowkanech
President

Laurel Brennan
Secretary-Treasurer

CW:LB:jn
OPEIU:153