



UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

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FEDERAL PERSONNEL AND
COMPENSATION DIVISION

MARCH 11, 1983

B-208172

The Honorable William D. Ford
Chairman, Committee on Post Office
and Civil Service
House of Representatives



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The Honorable Donald J. Albosta
Chairman, Subcommittee on Human
Resources
Committee on Post Office and Civil
Service
House of Representatives

The Honorable Patricia Schroeder
Chairwoman, Subcommittee on Civil
Service
Committee on Post Office and Civil
Service
House of Representatives

Subject: Effect of Fiscal Year 1982 Budget Reductions on
the Federal Labor Relations Authority
(GAO/FPCD-83-18)

This report responds to your March 11, 1982, request that we review the impact of fiscal year 1982 budget reductions on the Federal Labor Relations Authority (FLRA). The budget reductions occurred at FLRA as part of the actions taken by the President and the Congress to reduce the cost of the Federal Government.

FLRA's initial budget request to the Office of Management and Budget (OMB) for fiscal year 1982 was nearly \$18 million. OMB approved and included in the President's budget \$16.8 million. FLRA's final 1982 appropriation was \$14.2 million, approximately 11 percent less than its 1981 appropriation and about 15 percent less than its approved request for 1982. The \$14.2 million excluded a supplemental appropriation of \$645,000 approved by the Congress in September 1982.

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FLRA reduced its costs by separating 53 employees in two reductions in force; not filling vacant positions; curtailing staff travel; freezing staff promotions, cash incentive awards, Senior Executive Service bonuses, and training; suspending plans for statistical reporting and legal research systems; and cutting back on supplies, equipment, and equipment maintenance. In addition, FLRA closed its Kansas City regional office and transferred its caseload to the Denver suboffice, which was upgraded to a regional office.

As a result of the curtailment of staff travel,

--disposition of unfair labor practice cases took longer,

--FLRA's Office of the General Counsel supervised rather than conducted some union representation elections, and

--FLRA's Federal Service Impasses Panel (FSIP) took longer than in the prior year to resolve negotiation impasses.

The other cost-cutting actions produced mixed results.

Although the budget cuts prevented FLRA from effectively accomplishing its mission during the fiscal year, the agency also received fewer new cases than in the prior year. As a result, agencywide backlogs measured at the end of the year had not increased from the prior year, although backlogs in several regional offices did increase. In addition, yearend measures of delays in investigations and hearings were no longer at the peak levels which occurred during the fiscal year.

FLRA did not plan to reduce its expenses to the point that it could remain operational for the entire fiscal year without supplemental funding. FLRA's Executive Director told us that the agency received assurances from OMB that the Administration would support passage of FLRA's request for supplemental funding. FLRA's March 1, 1982, request for \$645,000 was approved on September 10, 1982, about a week before the agency would have had to furlough all employees for the remainder of the fiscal year.

OBJECTIVES, SCOPE, AND METHODOLOGY

Our objectives were to identify the steps taken by FLRA to absorb the fiscal year 1982 budget reductions, identify the impacts of those steps, and assess FLRA's capabilities to discharge its responsibilities during fiscal year 1982 under the Civil Service Reform Act of 1978 and other statutes.

We reviewed FLRA's budget justifications, staffing plans, annual reports, regulations, and internal memoranda dealing with the steps taken to absorb budget reductions and their impact on operations. We obtained the agency's caseload statistics. We did not verify their accuracy.

To obtain information on the effects of the budget reductions, we interviewed FLRA officials in Washington, D.C.; Atlanta, Georgia; Dallas, Texas; and San Francisco, California. We selected Dallas and Atlanta because they do not have high concentrations of Federal employees; thus, staff members from FLRA offices in these cities must travel to other locations to conduct onsite hearings or investigations and are dependent on travel funds for these purposes. We chose Washington, D.C., and San Francisco because they have large numbers of Federal employees; as a result, FLRA offices in these cities are less dependent on travel funds.

We conducted our review from April to September 1982 in accordance with generally accepted Government audit standards.

BACKGROUND

FLRA, established on January 1, 1979, by President Carter's Reorganization Plan No. 2 of 1978, administers title VII ("Federal Service Labor-Management Relations") of the Civil Service Reform Act of 1978, Public Law 95-454. FLRA is an independent, neutral, third-party agency with responsibilities for

- investigating and prosecuting unfair labor practice charges and complaints, 1/
- determining the appropriateness of units for labor organization representation,
- supervising or conducting elections to determine which union will represent specific bargaining units,

1/Unfair labor practice charges are allegations by employees, unions, or employers of violations of a right protected by title VII of the Civil Service Reform Act. A complaint notifies a charged party of the alleged violation and the time and date of the hearing. The processes and costs involved in resolving unfair labor practice charges are discussed in our report, "Steps Can Be Taken to Improve Federal Labor-Management Relations and Reduce the Number and Costs of Unfair Labor Practice Charges" (GAO/FPCD-83-5, Nov. 5, 1982).

- deciding whether an issue is subject to negotiations,
- aiding disputants in resolving negotiation impasses,
- resolving disputes arising from arbitrators' awards, and
- providing leadership in establishing guidelines relating to matters in the act.

FLRA is organized into four major subunits: Authority headquarters, Office of the General Counsel, ALJs, and FSIP. As of September 30, 1982, the agency had 274 employees compared to 368 at the beginning of fiscal year 1982.

Authority headquarters, composed of 3 presidentially appointed members and a staff of 100 (as of September 1982), provides most of the agency's administrative services and reviews and decides policy questions, exceptions to arbitration awards, negotiability disputes, questions of representation, and unfair labor practice cases.

The General Counsel, appointed by the President, investigates unfair labor practice charges and prosecutes unfair labor practice complaints; processes representation cases, including investigating union representation petitions; and supervises or conducts representation elections and certifies election results. As of September 1982, the Office of the General Counsel had 149 employees.

The Office of ALJs is an autonomous group that conducts hearings on unfair labor practice cases prosecuted by the General Counsel. ALJ decisions, unless reviewed by the Authority members, are final. Authority members generally will review a decision only if an exception is filed. Unreviewed ALJ decisions are not considered precedential. As of September 1982, FLRA had 11 judges.

FSIP assists parties in resolving impasses which occur during negotiations. As of mid-December 1982, FSIP had five members and a staff of six full-time and one part-time employees.

FISCAL YEAR 1982 BUDGET CHRONOLOGY

In March 1981, OMB included in the President's fiscal year 1982 budget request the sum of \$16.8 million for FLRA. This figure was \$1.2 million less than the agency's original request and only 5 percent more than its 1981 appropriation.

Because the Congress had not approved a budget for FLRA by the beginning of fiscal year 1982, the agency was included in a continuing resolution which established its spending authority at \$16 million. The resolution was effective until November 20, 1981, and was extended through December 15, 1981, by a second continuing resolution.

In September 1981, the President recommended a 12-percent, across-the-board reduction of his budget request for several agencies, including FLRA. When a third continuing resolution was passed in mid-December, the Congress cut the FLRA budget request, not only by the President's recommended 12 percent, but also by an additional 4 percent. These two cuts reduced FLRA's spending authority for fiscal year 1982 to \$14.2 million, which was about 11 percent less than the agency received in fiscal year 1981.

On March 1, 1982, FLRA requested \$645,000 in supplemental funds to cover most of the cost of the Government-wide October 1, 1981, salary increase and the lifting of the pay ceiling for Federal executives in January 1982. The request for supplemental funds was included in an appropriations package vetoed by the President but overridden by the Congress on September 10, 1982. With the supplemental funds, FLRA's total budget for the year was \$14.85 million, about 7 percent less than the agency's fiscal year 1981 budget.

DISPOSITION OF UNFAIR LABOR PRACTICE CASES TOOK LONGER

The process for resolving unfair labor practice allegations begins when a charge is filed with an FLRA regional office. The regional office staff investigates the charge and determines whether it is likely that rights established by the Reform Act have been violated. If investigators find no merit to the charge, and it is not voluntarily withdrawn, the charge is dismissed by the regional director. If the charge is found to have merit, and it is not voluntarily settled, the General Counsel issues a complaint. The complaint is prosecuted by a regional office attorney in a hearing, usually before an ALJ, but occasionally before the Authority members. Before the ALJ issues a decision, the parties can voluntarily withdraw the charge or reach voluntary settlement. If there is no settlement, the ALJ will issue a decision which may be affirmed, reversed, or modified by the Authority members. Although the members can review any ALJ decision, the decision is normally final unless challenged by one of the parties involved.

Processing times for several steps of the unfair labor practice charge resolution process increased during fiscal year 1982 because of the actions FLRA took to reduce its expenses. In addition, some FLRA officials told us they believed that the quality of investigations deteriorated.

Longer processing times occurred because of reduced travel funds. The fiscal year 1981 allocation of funds for travel for the Office of the General Counsel was \$1.1 million. The General Counsel spent only \$236,600 in fiscal year 1982. The Office of the ALJs spent about \$80,000 for travel in fiscal year 1981 but only \$26,000 in fiscal year 1982. As a result of these travel restrictions,

- investigators had to delay onsite investigations,
- prosecutors had to delay onsite pretrial preparations,
and
- ALJs had to delay hearings.

General Counsel's investigations and
pretrial preparations were less timely

The length of time between unfair labor practice charge receipt and disposition increased during fiscal year 1982 because of reduced travel funds. The Office of the General Counsel reported that the length of time taken by regional offices to dispose of charges through withdrawals, settlements, or dismissals or by issuing a complaint increased from 69 days on September 30, 1981, to 84 days on February 28, 1982. By fiscal year end, disposition time decreased to 78 days, which exceeded FLRA's standard of 75 days for regional dispositive action, and represented a 13-percent increase over the course of the year. (See enc. I.)

To conserve travel funds, the General Counsel halted all regional travel from November 1, 1981, to November 29, 1981, and from December 19, 1981, to January 3, 1982. The number of charges disposed of by the regional offices in November 1981 decreased 21 percent from the prior month, to the second lowest level since January 1980. In January 1982, following the total halt on travel, the General Counsel advised the regional offices that travel could be resumed but on a restricted basis. Regional offices differed in how they scheduled travel after that point; some alternated periods of travel with periods of no travel, others prorated travel funds on a monthly basis for the remainder of the year.

The Dallas office, for example, halted all travel during February, and the number of dispositive actions it took during that month decreased about 80 percent from the January rate. The Atlanta office reduced but did not stop travel, and its February productivity decreased 32 percent.

The regional offices made several changes in conducting and scheduling investigations to work around the travel restrictions, including

- conducting more investigations by telephone and mail instead of in person,
- delaying or postponing investigations until several could be conducted at the same location, and
- scheduling more investigations during onsite visits without increasing the time available for the visit.

According to some Office of the General Counsel officials, the results of those changes were less thorough investigations and fewer voluntary settlements.

Regional officials stated that telephone and mail investigations are not as effective as in-person interviews because they take longer to complete and eliminate the face-to-face contact between FLRA and the parties, which facilitates problem identification and early settlement. These officials told us that telephone investigations were adequate for collecting preliminary data only. Also, investigators said that when investigations are delayed, witnesses can become unavailable because they terminate employment, move, or die, or they forget relevant information. They added that long delays tended to harden the positions of the parties, which made voluntary settlements more difficult to achieve. This had the side effect of prolonging the unfair labor practice charge settlement process and increasing its cost.

Once the regional office, with General Counsel approval, issues a complaint, it becomes a regional office attorney's responsibility to schedule a hearing and prosecute the case. Because of the shortage of travel funds, attorneys often had to postpone trips to interview witnesses and to complete other pretrial preparations. Frequently, they had to prepare for a trial while also conducting work on other cases without being allowed to extend their visits to perform the extra work. Attorneys told us that last-minute case swapping occurred because of their travel schedules, which caused some attorneys to duplicate work and others to prosecute cases without

sufficient preparation. Swapping cases and delaying pretrial preparations tended to lengthen the gap between the time complaints were issued and the date hearings were scheduled.

Although productivity declined because of the travel limitations, the number of pending cases without dispositive action actually decreased during the year. There were 1,438 pending cases on October 1, 1981, and 1,177 by the end of September 1982. This reduction occurred because of the sharp decline in the number of cases filed. For example, from January to May 1982 regional offices received about 2,000 new charges, compared to 3,000 during the same period in 1981. (See enc. II.) According to FLRA officials, this reduction was due, in part, to

- the decertification of the Professional Air Traffic Controllers Union and the firing of 11,000 air traffic controllers and
- the signing of a new labor contract between the Social Security Administration and the American Federation of Government Employees.

Previously, these unions had been two major sources of unfair labor practice allegations. Additionally, FLRA officials speculated that a loss of confidence in FLRA's ability to investigate and resolve unfair labor practice charges in a timely manner may have caused unions to withhold filing charges. According to these officials, 96 percent of these charges are filed by unions.

As the number of pending cases declined agencywide during the year, so did the number of "overage" cases, i.e., those cases exceeding 75 days without disposition. However, the distribution of the overage cases among the regional offices changed. For example, on October 1, 1981, the Washington, D.C., office had 123 overage cases; at fiscal year end, it had only 12. The Atlanta office, on the other hand, had 48 overage cases at the beginning of the fiscal year and 126 at year end. The primary difference between these offices was the availability of travel funds and of ALJs to hold hearings.

A complicating factor was the absence of a General Counsel during the period between the resignation of FLRA's General Counsel on March 22, 1982, and the appointment of an Acting General Counsel on June 28, 1982. According to FLRA's interpretation of title VII of the Reform Act, only a General Counsel or Acting General Counsel is authorized to issue complaints or act on appeals of regional director decisions. Therefore, FLRA issued no complaints between late March and late June 1982, and

a backlog of unissued complaints developed. An FLRA official told us that these complaints were issued after the Acting General Counsel's appointment.

ALJ hearings delayed

The actions taken by the ALJs to operate with reduced travel funds resulted in delays in scheduling hearings in some regional offices and postponement of cases in remote areas.

The Office of the ALJs had its own travel budget during fiscal year 1982 to cover the cost of sending judges from Washington, D.C., to hearing sites across the country. To conserve travel funds, the judges expanded their use of "calendar calls"--a system of scheduling many cases within a specified timeframe to be heard at a common location. FLRA initiated this system in 1980 for areas with large concentrations of Federal employees, such as San Francisco and San Antonio. In fiscal year 1982, FLRA used calendar calls in other locations, including New York and Denver. Typically, the regional office attorney would "overbook" the judge's schedule knowing that many cases would be settled just before the trials. Even though these cases would be closed, by overbooking, the judge still would have enough work to justify his travel.

FLRA attempted to hold calendar calls whenever possible during fiscal year 1982. As a result, attorneys postponed scheduling hearings for cases in remote areas where a sufficient number of cases could not be assembled. In addition, if too many cases scheduled for a calendar call were settled before the ALJ left Washington, D.C., he would postpone his trip until a suitable number could be rescheduled. Some cases were repeatedly postponed when this occurred. The delays that occurred were not uniform in all geographic areas. The range among regional offices varied, depending on the availability of funds needed for travel. For example, the average time elapsing between complaint issuance and hearing during June 1982 for Washington, D.C., cases where no travel was required, was 43 days, while the average time for cases in San Francisco, where ALJs had to travel, was 84 days.

REORGANIZATION OF CHIEF COUNSEL'S OFFICE MITIGATED THE EFFECTS OF BUDGET REDUCTIONS

Authority members are assisted in their review of decisions by FLRA's Office of Chief Counsel. Although this office lost staff during the first reduction in force, its productivity increased due to internal improvements. The Chief Counsel's office issued 430 decisions from October 1980 to June 1981, compared to 287 decisions during the same period the year before.

The number of pending cases at the beginning of September 1982 was 653, compared to 784 at the beginning of fiscal year 1982. However, FLRA officials estimated that had this office not lost 15 staff members during the agency's reduction in force and had it been able to fill some of its 9 vacant positions, another 200 cases could have been processed.

The Chief Counsel's office reorganized as of January 1982, and moved to one headquarters building from other Washington, D.C. locations. The Offices of Program and Technical Assistance and Operations merged with the Chief Counsel's office, thereby consolidating all case handling functions into one office. Although FLRA had planned these actions before the budget reduction, their implementation served to cut costs, streamline processes, and reduce delays. A screening process was established to determine the order and manner in which cases would be decided. This process also lessened the amount of work attorneys in the Chief Counsel's office had to do for those cases with existing precedents.

FLRA's DECISION TO REDUCE EXPENSES
BY SUPERVISING RATHER THAN CONDUCTING
ELECTIONS MAY INCREASE COSTS

FLRA's regional offices investigate representation petitions and insure the propriety of elections held to determine which union, if any, will represent employees. This is only a small percentage of FLRA's workload; the agency received 470 representation cases in fiscal year 1981 and 274 cases in the first 9 months of fiscal year 1982.

FLRA can either conduct elections--print and distribute ballots, staff polling sites, and count ballots--or supervise elections conducted by the parties involved. FLRA, in the past, generally conducted complex elections involving many employees or multiple sites, or elections which were diplomatically sensitive. In fiscal year 1982, to save travel funds, FLRA chose to supervise rather than conduct such elections. However, this action increased the chance of questionable election practices.

In March 1982, FLRA supervised an election held in Panama for 7,000 Department of Defense (DOD) employees. FLRA estimated it would have to send 20 staff members to conduct an election with such a large electorate. Because of the budget reductions, FLRA chose instead to supervise the election and sent two officials. This choice reduced FLRA's expenses from an estimated \$30,000 to \$4,300.

The election generated several protests, including allegations of ineligible voters and questionable conduct in the vicinity of the polling sites. The unions ultimately withdrew their protests and FLRA issued a certification. However, if the charges had been found to be valid and substantive, the election would have been rerun, increasing FLRA's and DOD's costs.

Another Panama election involving 1,000 employees had to be postponed for several months until the beginning of fiscal year 1983 because of the shortage of fiscal year 1982 travel funds. The election was held in late November and early December and, because of a continuing shortage of travel funds, FLRA again supervised rather than conducted this election.

BUDGET CUTS AT FSIP DELAYED RESOLUTION OF NEGOTIATION IMPASSES

When the parties involved in negotiations reach an impasse, they can request assistance from the Federal Mediation and Conciliation Service. If this organization cannot resolve the impasse, any of the parties can request FSIP to intervene and resolve the impasse. Alternatively, the parties can agree, with FSIP approval, to engage an outside arbitrator. The request for FSIP's assistance is initially handled by a staff member who investigates the request and generally assists the parties, through fact-finding or by recommending arbitration. If there is still no resolution, FSIP takes a final action, such as issuing a binding decision.

FSIP also was affected by FLRA's reduced spending authority and took several steps to reduce its expenses. These included separating two of its eight full-time employees, not filling a vacant position, and reducing travel funds. At the same time, FSIP's caseload decreased by 15 percent, which officials attributed to at least two factors. One was a reduction in the number of Federal sector bargaining units principally stemming from unit consolidation and another was FSIP's perception that Federal employees were more concerned about the impact of budget cuts on their own jobs. However, FSIP noted that the issues involved in negotiations that reach impasse are more complex than in prior years and an increasing number of its decisions are disputed.

According to FSIP staff, although the number of cases decreased, the caseloads of individual staff members increased because of the staff reductions. In addition, professional staff had to perform many clerical duties. As a result, backlogs developed. Because of travel cuts, FSIP's staff held fewer

meetings between the parties than in past years and, with increasing frequency, reviewed the issues through written submissions instead of conducting hearings. Also, because of limited travel funds, FSIP members held meetings at 6-week rather than 4-week intervals and convened no meetings during the last 10 weeks of the fiscal year.

The net effect of these actions was a substantial increase in the time needed to resolve impasses and in yearend backlogs. Consequently, FSIP's ability to fulfill its mission by intervening promptly and resolving impasses deteriorated.

OTHER COST-CUTTING ACTIONS
PRODUCED MIXED RESULTS

In addition to restricting travel, FLRA

- conducted two reductions in force;
- cut back the purchase of supplies and equipment and expenditures for equipment maintenance;
- closed the Kansas City regional office and released courtroom space in Boston, Dallas, and Honolulu;
- froze staff promotions, cash incentive awards, Senior Executive Service bonuses, and training; and
- suspended plans for a regional computerized statistical reporting system and legal research system.

FLRA initiated a reduction in force on January 8, 1982, to save costs. Because this action did not result in sufficient savings, a second reduction in force took place on February 19, 1982. In total, 53 employees were separated. Remaining employees spent the balance of the year facing the prospect of furlough later in the year if supplemental funds were not approved.

The reductions in force and FLRA's inability to fill other vacant positions affected nearly every organization within the agency. To some extent, reductions in regional office staff were compensated for by the reduction in the number of cases filed. However, the administrative offices were significantly affected. For example, the Office of Administration could not fill several supervisory contracting, financial, and property management positions and several divisions lost all clerical staff. The remaining staff members had to share the duties of

the vacant positions in addition to spending significant periods of time directing FLRA efforts to remain within its reduced budget. FLRA reported that, as a result,

- backlogs of unpaid invoices and travel vouchers grew,
- outstanding travel advances were inadequately monitored,
- accounting records were not regularly reconciled,
- backlogs of requisitions for supplies developed,
- property inventories were delayed,
- the preparation of in-house regulations on procurement and financial operations were delayed, and
- the printing of bound volumes of FLRA decisions were halted.

The Office of Personnel noted that because of budget constraints, the agency could not provide initial training for first-time supervisors and managers, continuing development for incumbent senior executives, or equal employment opportunity training, all of which are required by statute and/or Office of Personnel Management regulations.

FLRA's cutback of purchases of supplies and equipment and equipment maintenance reduced costs during fiscal year 1982 but represent the type of savings that will not be recurring. Once supplies are used or equipment is worn out they will have to be replaced. Not maintaining equipment could result in the need to replace it sooner than would normally be expected.

The release of courtroom space in Boston, Dallas, and Honolulu and the closing of the Kansas City regional office were done to save rent expenses. However, closing the Kansas City office and combining its workload with the Denver suboffice was also based on FLRA's analysis of the shift in cases being filed to the Denver area. Thus, this action also improved operations.

The effects of freezing promotions; eliminating staff bonuses, cash awards, and training; and suspending regional office automation plans are difficult to quantify. However, regional managers told us the staff reductions and the yearlong threat of furlough clearly demoralized their remaining employees, many of whom began looking for other jobs. In addition, in our previous report on unfair labor practice charge processing, we noted that if the information routinely collected by FLRA's Office of the General Counsel was computerized and made

available to other agencies, it would be useful to the other agencies in monitoring and evaluating their labor-management situation. If agencies could identify problem areas and reduce the situations which result in charges, they could take steps to reduce the number of charges filed and the cost of their processing.

CONCLUSIONS

The numerous actions FLRA took to absorb the reductions in its spending authority adversely affected its operations and ability to fulfill its mission in a timely fashion during fiscal year 1982. FLRA's cost-cutting actions, particularly travel limitations, affected the agency's ability to investigate unfair labor practice charges and hold hearings as quickly as it had during the preceding year. Although FLRA was able to temporarily reduce a midyear increase in the time regional offices needed to dispose of unfair labor practice charges, we believe this was possible because the number of cases received significantly decreased. The lighter workload also prevented large case backlogs from developing during the year, despite the two reductions in force. However, yearend processing times still exceeded those at the beginning of the year by 13 percent. If FLRA's caseload returns to pre-1982 levels, the agency may find itself understaffed, with growing backlogs, and increased processing times.

Also, because of staffing and travel limitations, FSIP took substantially longer to settle the impasses brought before it; thus, we believe that FSIP was less able to effectively fulfill its mission to facilitate the labor-management negotiation process.


Many of FLRA's cost-cutting steps cannot be duplicated in fiscal year 1983 without severe disruption to the agency's operations. Staff morale is already low because of reductions in force and promotion freezes. Extending these conditions into fiscal year 1983 runs the risk of high attrition among the agency's trained staff.

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We discussed this report with FLRA and have made some suggested changes to clarify points and to include additional information. FLRA, while agreeing with the facts in the report, expressed concern that this report does not present the full extent of the impact of the fiscal year 1982 budget reductions on the agency's operations and the morale of its staff. We have attempted to show the steps taken by FLRA to absorb the reductions and the effect on the agency's mission. We agree,

however, that we did not highlight all of the operational effects or emphasize the adverse impact the reductions have had on staff morale.

As arranged with your offices, we are sending copies of this report to the Chairman, Federal Labor Relations Authority, and to the Director, Office of Management and Budget. Copies will also be made available to other interested parties who request them.

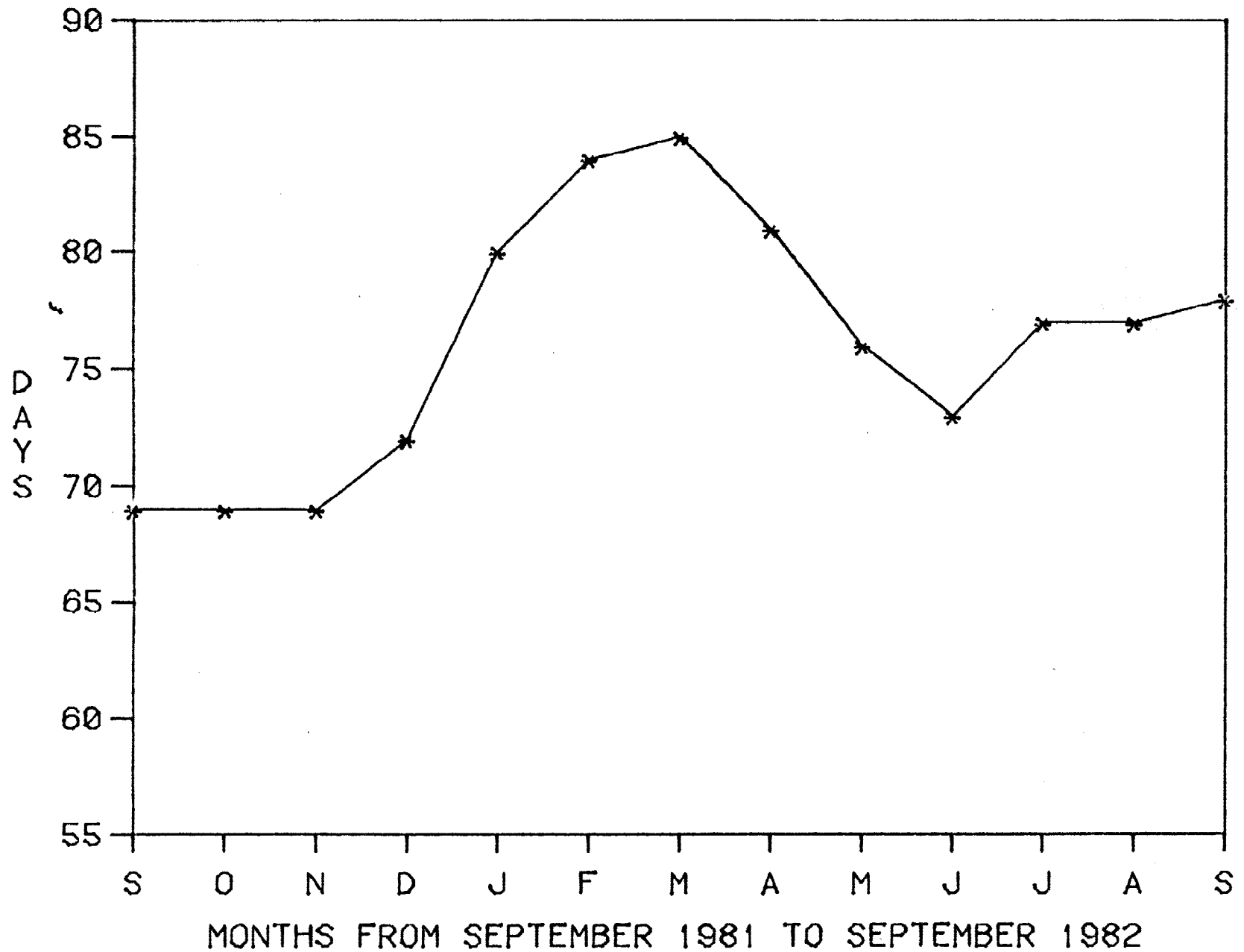

Clifford I. Gould
Director

Enclosures - 2

MEDIAN AGE OF REGIONAL OFFICE DISPOSITIVE

ACTIONS ON UNFAIR LABOR PRACTICE CHARGES

(4-MONTH ROLLING AVERAGE)



ENCLOSURE I

ENCLOSURE I

