

esting differences in context. We strenuously object to any such interpretation as above indicated.

It is the recommendation of this Association that certain of the proposed amendments be changed as follows:

1. Rule II *Definitions*. Add paragraph 40 to read "Work day or working day means a full day of an employee's regular working time."

2. Rule XVIII *Leave of Absence*. Section 3, *Vacation Leave* (a) Under "amount," change the first sentence to read "Employees shall be granted vacation with pay at the rate of one working day for each full calendar month of service."

Under (b) "scheduling and payment" in the first sentence strike out the word "annual." Elsewhere in this subsection b, in all cases, substitute the word "working" for the word "business," and also insert the word "working" before the words "day" or "days" wherever they appear.

3. Rule XVIII *Leave of Absence*. Section 2, *Leave Computations* (a) Change the second sentence to read "In order to standardize payroll computations, the rate for leave deductions or earnings shall be calculated proportional to the regular working time of the employee." (b) Change the third sentence to read "Deductions from leave accumulations shall be made only for employees work days."

4. Rule XVIII *Leave of Absence*. New Section 7, *Special Leaves with Pay* Substitute the word "working" for the word "business" in the second sentence.

Each of the above suggested changes is made on the basis of justice, equity and principle. This Association speaks for a majority of the state employees and reflects the views of the great bulk of the employees. We have earned the respect of the public, the press and the legislative body by the attitudes which we take in personnel matters.

In principle, the Civil Service Act was enacted to "establish a system of personnel administration based on merit principles and scientific methods" (Sec-

tion 2, Chapter 400, Oregon Laws 1945).

Our suggested changes will eliminate inconsistencies, absurdities and unfair procedures embodied in the proposed amendments which include, but are not necessarily limited to, the following:

1. Charging an employee with 6 days of earned vacation leave during the period which requires 5 days work; or at the ratio of 1 1/5:1.

2. Assuming all vacation leaves to occur once a year only.

3. Using the terms "working day" and "business day" indiscriminately in the rules without apparent reason, to confusing effect, and directly in conflict with recognized definitions.

4. Disturbing the morale of the employees, perpetuating present evils and fostering discontent and resentment, all to the detriment of public service.

5. The establishment of complex and expensive accounting systems for departments.

6. The assumption of the Commission by defining the "work day" of an employee to be the same as a "business day" of a department or institution. The Commission is empowered to set work schedules for *employees* only. They need not, and often do not, conform with a *department's* work schedule. Discrimination is apparent when leaves of absence are singled out and *made* to conform to department "days," while employees schedules are *not* set necessarily to conform.

7. The sick and disability leaves provided for in Subdivision 5, Section 18, of the act are also affected, by an apparently simple insertion of a new definition in the rules. This procedure constitutes a *major* change in meaning by an expedient but minor amendment.

8. The heirs of a deceased employee will be deprived of part of the earned pay of the employee for unused vacation. A retired employee or one leaving the service would also be deprived of a part of his earned pay for unused vacation.

9. There is an assumption that all