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20 April 1979

MEMORANDUM FOR: [REDACTED]  
Chief, NFAC Administrative Staff

FROM : [REDACTED]  
Chief, Requirements and Evaluation Staff

SUBJECT : Draft OMB Circular on Employee Parking

Introduction

1. Reviewing the subject draft circular, I perceive a glaring omission in the logic of the cost-benefit analysis of charging federal employees for parking. My comments, which I request you forward to the DDA, are especially applicable to situations such as at CIA headquarters where the general public does not compete for parking, and where the only stated reason for charging employees is to encourage car pools and greater use of public transportation.

Discussion

2. While the OMB circular is replete with comments that car pooling and mass-transportation use increase whenever employees are forced to pay for parking, it is remarkable that no mention is made concerning the loss to the government owing to the regularization of work hours, a time-clock syndrome if you will, which naturally follows dependence on strictly scheduled transportation. According to my observations, individuals who participate in car pools or ride the bus almost invariably adhere to a strict eight-hour day and are rarely at work on weekends. The number of unpaid, professional overtime hours lost as a result are considerable. If the suggested policies

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on parking are implemented, there will be great losses of productivity. These costs come out of the taxpayers' pockets just as do the parking subsidies; moreover, productivity loss is extremely more costly, not only in terms of dollars, but in our case, also in terms of national security.

#### Recommendation

3. I believe that some scheme must be devised for maintaining present productivity without undermining the President's energy-conservation program. Agency regulations [redacted] state that CIA employees of grades GS-12 through GS-14 are expected to contribute the first eight hours of overtime they work each week. Employees of GS-15 and above are normally expected to contribute all overtime. I propose that employees in these categories (and others who do not receive direct compensation for overtime) should be given credit at the rate of, say, one dollar for each overtime hour up to a maximum monthly amount equal to the parking fee. While defraying the monthly cost of parking, an incentive will be provided for maintaining the productivity of those who have voluntarily donated their time for the good of the Agency and thus the nation.

4. A mechanism already exists to maintain an accounting of this overtime under the compensatory category. Thus, with little or no added administrative cost, a means exists for equitably countering the trend toward lower productivity that necessarily will accompany a bureaucratic imposition of constraints on individual transportation.

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