

Federal Salary Council

1900 E Street NW.

Washington, DC 20415-8200

November 22, 2011

**MEMORANDUM FOR: THE PRESIDENT'S PAY AGENT
HONORABLE HILDA L. SOLIS
HONORABLE JACOB J. LEW
HONORABLE JOHN BERRY**

**SUBJECT: Level of Comparability Payments for January 2013 and Other
Matters Pertaining to the Locality Pay Program**

As authorized by the Federal Employees Pay Comparability Act of 1990 (FEPCA), we present our recommendations for the establishment or modification of pay localities, the coverage of salary surveys conducted by the Bureau of Labor Statistics (BLS) for use in the locality pay program, the process of comparing General Schedule (GS) pay to non-Federal pay, and the level of comparability payments for January 2013.

Bureau of Labor Statistics Surveys and Pay Gap Methodology

We reviewed comparisons of General Schedule and non-Federal pay calculated using Bureau of Labor Statistics salary survey data collected under the National Compensation Survey (NCS) program and pay comparisons using a model developed by BLS for using Occupational Employment Statistics (OES) data in the locality pay program. All of the pay gaps (i.e., percentage difference between base GS rates and non-Federal pay for the same levels of work) were calculated using the same general weighting and aggregation methods in use since 1994, when locality pay was first implemented. The BLS survey data, both OES and NCS, cover establishments of all employment sizes.

NCS Survey Results

NCS data this year include all of the survey improvements designed for the program. This may be the last year NCS data will be available because BLS has canceled much of the survey as it migrates to using the OES model.

Attachment 1 shows the pay gaps for each current locality pay area using NCS data for both 2010 and 2011 and the rate of change between 2010 and 2011.

Changes in NCS Pay Gaps Since 2010

The average NCS pay gap for the 34 existing locality pay areas is 51.37 percent in 2011, compared to 48.51 percent in 2010, an increase of 2.86 points. Only Miami and Washington, DC, show small

decreases. This overall increase is in line with general labor market trends. Private sector pay increased about 1.6 percent between March 2010 and March 2011 as measured by the Employment Cost Index (ECI) for wages and salaries, private sector workers, while Federal employees did not receive statutory pay increases in 2011 due to the 2-year statutory pay freeze. While GS pay gaps are affected by many factors, an average pay gap of approximately 49 percent in 2010 could be expected to grow to about 51 percent at a 1.6 percent growth rate, given that GS employees did not receive a base pay increase in 2011. Note that these pay gaps exclude current locality pay rates received by GS employees. Since locality pay is paid on base GS rates, we exclude locality pay when measuring pay gaps. Factoring in the current average locality pay rate of 19.85 percent would reduce the average 2011 pay gap to about 26.3 percent, compared to 24.05 percent for 2010.

OES Survey Results

As we reported last year, BLS has developed a model to estimate the impact of work level on salary by combining OES and NCS data so that OES data could be used in the locality pay program. BLS' model looks at how salaries vary by work level compared to occupational average salaries so that OES occupational average salaries can be used to estimate salaries by work level. BLS can apply the model to locations where it has not conducted an NCS program survey.

Over the last several years, we reviewed OES test data for the locality pay areas and certain other locations. **Attachment 2** shows 2010 and 2011 pay gaps based on the OES model for the existing locality pay areas and certain other locations. We also show the rate of change since last year.

Changes in OES Pay Gaps Since 2010

We are concerned about how the OES model gaps changed since last year. Overall, the pay gaps increased by 10.6 points, with 25 of the 44 locations shown increasing by more than 10 points. This result is out of line with other economic indicators, including the results of the NCS surveys. We are particularly concerned that most of the areas are substantially affected by large increases in the estimated salaries for professional and administrative jobs, particularly at grades GS-12 and GS-13.

While we have test results for the new OES model covering 2007 through 2009 and a production run for 2010, this is the first time the model has produced such results. We explored several possible causes of these large increases.

Omission of NCS Wage Sample—the Primary Cause of Changes in OES Pay Gaps

BLS' establishment sample for the NCS is divided into a "wage" sample and an "index" sample. The wage sample represents an expanded survey base for the locality pay program; however, future NCS surveys may no longer include the wage sample. In other words, the wage sample is the part of the NCS program that has been canceled. The index sample is used for the Employment Cost Index and will continue. This is the part of the NCS sample that may be used in the future to derive the impact of grade level on pay for the OES model. BLS tested the impact on the OES model of including only a portion of the NCS sample during model development and found the sample reduction did not significantly affect the results for the test year. For this year's OES model and first OES data delivery, BLS did not use the wage sample, since it will not exist in the future unless

it is restored, as we recommend. However, BLS did use the entire wage and index samples for the NCS delivery. It appears that average salaries for professional and administrative jobs are substantially higher in the index sample than in the wage sample this year, and this is the main reason for the large increases in OES pay gaps.

We asked BLS to recompute the OES model using the full NCS sample—wage and index. Using the full NCS sample, the pay gaps are on average 4.89 points lower than the results based solely on the “index” sample, thus explaining about 46 percent of the noted 10.6 point change in the average pay gap since last year. While using the NCS full sample would likely fix the problem we encountered this year, it may reoccur next year if the “wage” sample is no longer collected.

If we use the 2.86 point increase in the NCS pay gaps as a benchmark of rate of change due to labor market changes since last year, 4.89 plus 2.86 points of the 10.6 point increase have been explained—about 73 percent. **Attachment 2** also shows the impact of the wage/index sample by area.

Recommendations on OES Model

We plan to continue working with OPM and BLS on the OES model to enhance our understanding of the model. Until the model is well understood, we recommend the President’s Pay Agent (Pay Agent) use NCS data for existing locality pay areas.

For establishing new locality pay areas in Albany, Albuquerque, Bakersfield, Charlotte, and Harrisburg, we recommend using aged 2010 data from the OES model as shown in **Attachment 3**. There are about 24,000 GS employees in these new areas. We recommend no action be taken for Virginia Beach at this time because it was not covered by the earlier test results.

We also recommend locations in the Rest of U.S. locality pay area be rank ordered by GS employment and that the Pay Agent ask BLS to provide OES model data for all metropolitan areas with 2,500 or more GS employees in time for evaluation in 2012. If OES model data are usable in 2012, we will develop recommendations on how many and which additional locality pay areas should be approved for implementation in 2014 and beyond. Since a small percent of payroll is usually approved for locality pay increases, implementing many additional areas at once may not be feasible, even if warranted by survey findings.

Reinstatement of NCS

The Council originally requested the OES model be developed as a way to allow additional metropolitan areas to be considered for establishment as independent locality pay areas, not as a replacement for the NCS program. We believe the NCS provides critical information to enhance the accuracy of comparisons between Federal pay and pay in the non-Federal sector. Considering that the GS payroll exceeds \$80 billion annually, we believe the \$8 million annual cost of the wage sample portion of NCS to be a wise and prudent expenditure (0.01% of payroll cost). NCS provides robust, reliable, and high quality non-Federal pay data, improving our ability to appropriately administer Federal pay in a viable, sound, and transparent manner. Accordingly, we recommend the Pay Agent reinstate the full National Compensation Survey program.

Locality Rates for 2013

Based on the NCS survey results for locality pay in 2013, the overall gap between base GS average salaries (excluding any add-ons such as GS special rates and existing locality payments) and non-Federal average salaries surveyed by BLS in locality pay areas was 51.37 percent as of March 2011. The amount needed to reduce the pay disparity to 5 percent (the target gap) averages 44.16 percent. The proposed comparability payments for 2013 for each existing locality pay area are shown in **Attachment 4**. Locality rates for new areas are shown in **Attachment 3**.

These locality rates would be in addition to the 1.2 percent increase in General Schedule base rates under 5 U.S.C. 5303(a). This provision calls for increases in basic pay equal to the percentage increase in the Employment Cost Index, wages and salaries, private industry workers, between September 2010 and September 2011, less half a point. The ECI increased 1.7 percent in September 2011.

Requests to Be Included in Existing Pay Areas or to Establish New Locality Pay Areas

OPM staff had contacts from employees in 30 locations by email, telephone, or letter since 2010:

Albany, NY	Allentown, PA	American Samoa
Ames, IA	Atlantic County, NJ	Austin, TX
Berkshire County, MA	Burlington, VT	Butte County, CA
Charlotte, NC	Charlottesville, VA	Clallam and Jefferson Counties, WA
Claremont, VT (White River Junction)	Columbus, GA	Edwards, CO
Franklin County, ME	Granville County, NC	Guam
Jefferson County, NY	Lansing, MI	Mono County, CA
Nashville, TN	Northern Marianna Islands	Pitkin County, CO
Portland, ME	Savannah, GA	Tampa, FL
VA Clinics in Ohio	Vermont	Virginia Beach, VA

We also received letters or petitions from employees or groups representing Albany, NY; Atlantic County, NJ; Berkshire County, MA; Claremont, NH-VT; Granville County, NC; and Virginia Beach, VA. Employees from several of these locations provided oral testimony at Council meetings. In summary, employees in Albany request it be made a separate locality pay area, employees in Atlantic County seek to be moved from the Philadelphia pay area to the New York pay area, employees in Berkshire County request being included in the Hartford locality pay area, employees in Claremont seek to be included in the Boston locality pay area, employees in Granville seek to be added to the Raleigh locality pay area, and employees in Virginia Beach seek to be evaluated as a separate area.

We propose changes in how locality pay areas are defined later in this recommendation. We have already covered the disappointing results from the 2011 OES model for implementing new locality

pay areas and explained how new areas can be established for Albany, Albuquerque, Bakersfield, Charlotte, and Harrisburg using 2010 test results. Since reliable 2011 data on non-Federal pay levels are not available for additional new areas and we are proposing a number of changes in how locality pay areas are defined, we suggest the Pay Agent not take separate or additional action on any of the areas that contacted OPM. We recommend action only for locations where we have data from last year's OES model that can be used to establish a new locality pay area or in locations that meet the proposed requirements to be included in a separate locality pay area. Locations where we do not have OES data for 2010 and locations that do not meet the proposed criteria must remain in the Rest of U.S. locality pay area in 2013.

Criteria for Areas of Application

We also reviewed the current criteria for adding adjacent locations to an existing locality pay area. We previously recommended these criteria, the President's Pay Agent approved them, and they have been modified over the years. The current criteria are based on the number of employees covered by the GS pay system and the level of commuting to/from the adjacent area and the Metropolitan Statistical Area (MSA) or Combined Statistical Area (CSA) comprising the locality pay area.

Last year, we concluded that commuting is the most relevant criterion and measures the degree of economic linkage among areas. The GS employment criterion has always been problematic and hard to justify because it is not based on an economic linkage among geographic locations. Accordingly, the Council recommended that the GS criteria be dropped. Unfortunately, the Pay Agent did not approve this recommendation for implementation in 2012, mainly because of the 2-year pay freeze.

We believe our recommendations last year continue to be appropriate and resubmit our 2010 proposal for implementation in 2013, after the 2-year pay freeze expires. Under this proposal, we would continue to use a threshold of 7.5 percent employment interchange rate (commuting) for evaluating adjacent metropolitan and combined statistical areas for inclusion in an adjacent locality pay area. We also recommend adopting a new single county commuting criterion of 20 percent (instead of 7.5 percent) for evaluating adjacent counties that are not part of a multi-county MSA or CSA. We recommend increasing the commuting criterion for single counties in consideration of dropping the GS employment criterion and to insure counties are included only when there is substantial commuting to/from the pay area which would seriously affect Federal agency recruitment and retention of employees.

New Commuting Pattern Data

We also have new commuting pattern data available this year. The data were collected as part of the American Community Survey in 2006-2008. The current release includes only counties in the United States with populations of more than 20,000 persons, and the full data set will not be available until 2013. While some counties are missing from the data, which could affect the results, the data are more current than the 2000 census data we have been using and we recommend using the new commuting pattern data now.

Micropolitan Areas

The Claremont CSA (White River Junction, VT) is composed of four counties (Orange and Windsor Counties, VT; and Grafton and Sullivan Counties, NH) in two micropolitan areas. It does not contain any metropolitan areas. The Pay Agent stated it would not use micropolitan areas in the locality pay program unless associated with a metropolitan area. (A metropolitan area includes at least one urbanized area with a population of 50,000 or more. A micropolitan area includes at least one urbanized area with a population of at least 10,000 but less than 50,000.) If considered as a CSA, the entire Claremont CSA would pass the new criteria. Only Grafton and Sullivan Counties would pass the recommended single county criteria. If considered separately, the two counties in Vermont are not even adjacent to the Boston locality pay area. Nevertheless, we renew our recommendation made in 2010 that the Claremont area be treated as a single unit. Likewise, there are two other micropolitan areas affected by our recommendations shown in **Attachment 5**. We believe the distinction between an area with a population core of perhaps 50,001 (a metropolitan area) and one with a population core of 49,999 (a micropolitan area) is artificial and that all areas identified by the Office of Management and Budget (OMB) should be treated the same under the locality pay program.

We note that several locations would pass the current criteria if the new commuting pattern data were used or all GS employees counted. This includes Portland, ME, and Granville County, NC. Some employees in the Portland, ME, area were retained in the Boston locality pay area when new MSA definitions were implemented in 2005. Likewise, most employees in Granville County, NC, are already included in the Raleigh locality pay area under the Federal facilities that cross county lines criteria. We recommend the Pay Agent not exclude these employees when evaluating these areas for inclusion in an adjacent locality pay area under the current criteria.

Summary of Pay Area Boundaries

These criteria recommendations would move about 15,400 GS employees in 23 metropolitan areas and about 4,000 GS employees in 97 counties into an existing locality pay area. The affected areas are listed in **Attachments 5 and 6**.

New Core-Based Statistical Areas

Under Office of Personnel Management (OPM) regulations, locality pay area boundaries change automatically when OMB adds counties to Core-Based Statistical Areas (CBSAs). OMB periodically makes substantial revisions in CBSAs and is planning a major update for 2013. Prior to the 2003 CBSA update, OPM temporarily changed its regulations so that locality pay areas would not change with the new CBSA definitions. This provided time for the Council and the Pay Agent to review the new CBSA definitions for use in the locality pay program. We believe this is a good practice and recommend OPM revise its regulations again to delink from CBSA definitions for the 2013 update.

Summary of Locality Pay Areas for 2013

In summary, we recommend retaining the 34 existing locality pay areas, adding new locality pay areas for Albany, NY, Albuquerque, NM, Bakersfield, CA, Charlotte, NC, and Harrisburg, PA, and amending the criteria for evaluating areas adjacent to existing locality pay areas for inclusion in the pay area.

By direction of the Council:

SIGNED

Stephen E. Condrey, Ph.D.
Chairman

Attachments

National Compensation Survey Pay Gaps March 2011 and March 2010				
AREA	March 2011 GS Base Payroll	2011 NCS Pay Gap	2010 NCS Pay Gap	Change
Anchorage (2005)*	\$484,514,023	58.00%	55.39%	2.61%
Atlanta	\$1,793,721,540	48.21%	46.13%	2.08%
Boston	\$1,647,263,198	61.33%	56.51%	4.82%
Buffalo	\$303,385,070	42.23%	36.66%	5.57%
Chicago	\$1,366,489,414	58.67%	55.67%	3.00%
Cincinnati	\$457,677,756	43.62%	39.58%	4.04%
Cleveland	\$633,832,948	43.84%	41.79%	2.05%
Columbus	\$567,202,360	42.46%	40.77%	1.69%
Dallas	\$1,246,149,515	52.15%	49.14%	3.01%
Dayton	\$736,844,613	42.09%	35.93%	6.16%
Denver	\$1,253,550,161	51.69%	49.94%	1.75%
Detroit	\$829,737,966	51.17%	46.92%	4.25%
Hartford	\$285,834,666	64.77%	61.56%	3.21%
Honolulu*	\$898,027,005	45.92%	39.34%	6.58%
Houston	\$882,302,985	50.97%	50.62%	0.35%
Huntsville	\$791,112,530	50.32%	45.65%	4.67%
Indianapolis	\$541,862,549	39.63%	35.64%	3.99%
Los Angeles	\$2,238,985,443	61.83%	58.02%	3.81%
Miami (2010 FSC version)	\$864,170,325	49.42%	51.10%	-1.68%
Milwaukee	\$217,725,602	44.62%	38.72%	5.90%
Minneapolis	\$476,095,848	53.95%	51.92%	2.03%
New York	\$3,208,239,240	68.63%	65.62%	3.01%
Philadelphia	\$1,701,012,166	51.76%	49.83%	1.93%
Phoenix	\$548,320,318	48.69%	43.93%	4.76%
Pittsburgh	\$431,108,668	37.80%	35.13%	2.67%
Portland	\$643,900,996	55.59%	51.69%	3.90%
Raleigh	\$888,607,985	41.33%	35.38%	5.95%
Rest Of US*	\$34,005,800,537	35.87%	30.95%	4.92%
Richmond	\$574,916,783	39.13%	34.98%	4.15%
Sacramento	\$464,889,599	56.29%	54.55%	1.74%
San Diego	\$1,373,402,558	65.23%	56.40%	8.83%
San Jose	\$1,640,123,693	75.56%	72.55%	3.01%
Seattle	\$1,633,338,558	59.55%	52.85%	6.70%
Washington, DC	\$21,528,316,542	70.05%	71.60%	-1.55%
Total/Averages	\$87,158,463,160	51.37%	48.51%	2.86%

* Anchorage and Honolulu payroll are whole State and RUS includes nonforeign and some locations shown separately elsewhere.

2011 Occupational Employment Statistics Pay Gaps						
AREA	March 2011 GS Base Payroll	2011OES Index Sample	2010 OES	Change	2011OES full NCS sample	Compared to Index Sample
Albany	\$171,522,656	48.38%	39.18%	9.20%	46.99%	1.39%
Albuquerque	\$514,173,430	54.17%	36.68%	17.49%	49.97%	4.20%
Anchorage	\$484,514,023	68.71%	53.99%	14.72%	65.03%	3.68%
Atlanta	\$1,793,721,540	55.82%	43.42%	12.40%	50.04%	5.78%
Bakersfield	\$50,692,328	67.22%	58.97%	8.25%	62.11%	5.11%
Boston	\$1,647,263,198	66.17%	56.02%	10.15%	61.46%	4.71%
Buffalo	\$303,385,070	49.77%	40.23%	9.54%	46.37%	3.40%
Charlotte	\$165,592,339	48.31%	42.99%	5.32%	49.93%	-1.62%
Chicago	\$1,366,489,414	62.63%	53.68%	8.95%	57.40%	5.23%
Cincinnati	\$457,677,756	43.03%	37.15%	5.88%	39.25%	3.78%
Cleveland	\$633,832,948	46.06%	38.42%	7.64%	41.93%	4.13%
Columbus	\$567,202,360	45.04%	38.19%	6.85%	42.23%	2.81%
Dallas	\$1,246,149,515	56.60%	46.12%	10.48%	51.57%	5.03%
Dayton	\$736,844,613	48.36%	37.60%	10.76%	43.30%	5.06%
Denver	\$1,253,550,161	66.61%	58.19%	8.42%	60.68%	5.93%
Detroit	\$829,737,966	61.97%	52.23%	9.74%	57.56%	4.41%
Guam		-0.80%	-0.46%	-0.34%	-2.95%	2.15%
Harrisburg	\$367,911,408	48.09%	37.20%	10.89%	44.57%	3.52%
Hartford	\$285,834,666	65.51%	56.04%	9.47%	61.50%	4.01%
Honolulu	\$898,027,005	50.58%	39.19%	11.39%	46.82%	3.76%
Houston	\$882,302,985	66.43%	53.12%	13.31%	60.22%	6.21%
Huntsville	\$791,112,530	55.97%	44.72%	11.25%	49.39%	6.58%
Indianapolis	\$541,862,549	35.67%	29.65%	6.02%	32.78%	2.89%
Lansing	\$46,577,257	43.33%	39.26%	4.07%	39.75%	3.58%
Los Angeles	\$2,238,985,443	78.49%	66.33%	12.16%	74.07%	4.42%
Miami	\$864,170,325	50.73%	40.65%	10.08%	46.56%	4.17%
Milwaukee	\$217,725,602	48.54%	40.83%	7.71%	44.74%	3.80%
Minneapolis	\$476,095,848	56.31%	47.67%	8.64%	52.31%	4.00%
New York	\$3,208,239,240	77.72%	65.21%	12.51%	72.64%	5.08%
Philadelphia	\$1,701,012,166	64.01%	52.85%	11.16%	59.51%	4.50%
Phoenix	\$548,320,318	50.11%	39.77%	10.34%	46.54%	3.57%
Pittsburgh	\$431,108,668	46.81%	35.35%	11.46%	42.93%	3.88%
Portland	\$643,900,996	55.80%	43.89%	11.91%	50.93%	4.87%
Portland ME	\$54,033,178	43.90%	32.81%	11.09%	41.39%	2.51%
Puerto Rico		-8.43%	-15.31%	6.88%	-10.31%	1.88%
Raleigh	\$888,607,985	46.56%	35.29%	11.27%	43.01%	3.55%
Rest Of US	\$32,635,297,941	35.54%	28.14%	7.40%	32.65%	2.89%
Richmond	\$574,916,783	43.98%	34.64%	9.34%	40.49%	3.49%
Sacramento	\$464,889,599	64.00%	49.76%	14.24%	59.81%	4.19%
San Diego	\$1,373,402,558	80.57%	67.68%	12.89%	76.77%	3.80%
San Francisco	\$1,640,123,693	96.11%	82.41%	13.70%	89.99%	6.12%
Seattle	\$1,633,338,558	66.59%	54.80%	11.79%	62.83%	3.76%
Virgin Islands		25.81%	15.24%	10.57%	22.37%	3.44%
Washington DC	\$21,528,316,542	85.09%	70.40%	14.69%	76.72%	8.37%
All Areas Shown	\$87,158,463,160	58.27%	47.67%	10.60%	53.38%	4.89%
Proportion increase due sample reduction						46.09%

Aged 2010 OES Pay Gaps for New Locality Pay Areas			
Area	2010 Gap	Gap Aged to 2011	Target Gap and 2013 Rate
Albany	39.18%	41.41%	34.68%
Albuquerque	36.68%	38.87%	32.26%
Bakersfield	58.97%	61.51%	53.82%
Charlotte	42.99%	45.28%	38.36%
Harrisburg	37.20%	39.40%	32.76%

National Compensation Survey March 2011 Pay Gaps and Locality Pay Rates for 2013			
AREA	March 2011 GS Base Payroll	2011 NCS Pay Gap	Target Gap and 2013 Rate
Anchorage	\$484,514,023	58.00%	50.48%
Atlanta	\$1,793,721,540	48.21%	41.15%
Boston	\$1,647,263,198	61.33%	53.65%
Buffalo	\$303,385,070	42.23%	35.46%
Chicago	\$1,366,489,414	58.67%	51.11%
Cincinnati	\$457,677,756	43.62%	36.78%
Cleveland	\$633,832,948	43.84%	36.99%
Columbus	\$567,202,360	42.46%	35.68%
Dallas	\$1,246,149,515	52.15%	44.90%
Dayton	\$736,844,613	42.09%	35.33%
Denver	\$1,253,550,161	51.69%	44.47%
Detroit	\$829,737,966	51.17%	43.97%
Hartford	\$285,834,666	64.77%	56.93%
Honolulu	\$898,027,005	45.92%	38.97%
Houston	\$882,302,985	50.97%	43.78%
Huntsville	\$791,112,530	50.32%	43.16%
Indianapolis	\$541,862,549	39.63%	32.99%
Los Angeles	\$2,238,985,443	61.83%	54.12%
Miami	\$864,170,325	49.42%	42.31%
Milwaukee	\$217,725,602	44.62%	37.74%
Minneapolis	\$476,095,848	53.95%	46.62%
New York	\$3,208,239,240	68.63%	60.60%
Philadelphia	\$1,701,012,166	51.76%	44.53%
Phoenix	\$548,320,318	48.69%	41.61%
Pittsburgh	\$431,108,668	37.80%	31.24%
Portland	\$643,900,996	55.59%	48.18%
Raleigh	\$888,607,985	41.33%	34.60%
Rest Of US	\$34,005,800,537	35.87%	29.40%
Richmond	\$574,916,783	39.13%	32.50%
Sacramento	\$464,889,599	56.29%	48.85%
San Diego	\$1,373,402,558	65.23%	57.36%
San Jose	\$1,640,123,693	75.56%	67.20%
Seattle	\$1,633,338,558	59.55%	51.96%
Washington, DC	\$21,528,316,542	70.05%	61.96%
All Pay Areas	\$87,158,463,160	51.37%	44.16%

Multi-County Metropolitan Areas Added to Existing Pay Areas under Proposed Criteria

LOCALITY PAY AREA	ADJACENT METROPOLITAN AREA	2000 COMMUTE RATE	2006-2008 COMMUTE RATE	GS EMPL AVG SEP 10 TO JUN 11
Atlanta	Athens-Clarke County, GA Metropolitan Statistical Area	15.31	17.59	745
Atlanta	Columbus-Auburn-Opelika, GA-AL Combined Statistical Area	6.02	7.63	4,535
Boston	Claremont-Lebanon, NH-VT Combined Statistical Area	8.90	9.88	904
Boston	Portland-Lewiston-South Portland, ME Combined Statistical Area	7.40	8.31	3,701
Chicago	Ottawa-Streator, IL Micropolitan Statistical Area	17.39	19.70	83
Chicago	Rockford-Freeport-Rochelle, IL Combined Statistical Area	9.16	11.98	204
Cincinnati	Maysville, KY Micropolitan Statistical Area	21.55		16
Cleveland	Canton-Massillon, OH Metropolitan Statistical Area	20.21	23.86	198
Columbus	Mansfield-Bucyrus, OH Combined Statistical Area	10.68	13.99	186
Detroit	Lansing-East Lansing-Owosso, MI Combined Statistical Area	9.90	10.42	815
Detroit	Saginaw-Bay City-Saginaw Township North, MI Combined Statistical Area	8.59	9.84	631
Detroit	Toledo-Fremont, OH Combined Statistical Area	7.09	7.62	722
Huntsville	Florence-Muscle Shoals, AL Metropolitan Statistical Area	10.33	11.16	129
Indianapolis	Bloomington, IN Metropolitan Statistical Area	10.91	11.38	89
Indianapolis	Kokomo-Peru, IN Combined Statistical Area	11.99	11.74	407
Indianapolis	Lafayette-Frankfort, IN Combined Statistical Area	6.98	9.82	212

LOCALITY PAY AREA	ADJACENT METROPOLITAN AREA	2000 COMMUTE RATE	2006-2008 COMMUTE RATE	GS EMPL AVG SEP 10 TO JUN 11
Miami	Port St. Lucie-Sebastian-Vero Beach, FL Combined Statistical Area	11.60	14.52	499
Milwaukee	Fond du Lac-Beaver Dam, WI Combined Statistical Area	15.00	18.43	85
Minneapolis	Rochester, MN Metropolitan Statistical Area	7.40	7.69	511
Philadelphia	Allentown-Bethlehem-Easton, PA-NJ Metropolitan Statistical Area	10.20	11.11	283
Pittsburgh	Weirton-Steubenville, WV-OH Metropolitan Statistical Area	12.52	15.16	25
Raleigh	Rocky Mount, NC Metropolitan Statistical Area	9.32	10.31	41
Washington	Cumberland, MD-WV Metropolitan Statistical Area	6.94	7.99	344
Total				15,365

Commuting between <u>Proposed</u> New Pay Areas and Adjacent Multi County Metropolitan Areas				
AREA	ADJACENT MET	2000 COMMUTE	2006-2008 COMMUTE	GS Empl Avg Sep 10 to Jun 11
Albuquerque	Santa Fe-Espanola, NM Combined Statistical Area	11.68%	13.73%	922
Charlotte	Hickory-Lenoir-Morganton, NC Metropolitan Statistical Area	10.98%	14.68%	118

Single Counties Added to Existing Locality Pay Areas under Proposed Criteria

LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTE 2000 CENSUS	COMMUTE 2006-2008	POP DENSITY PERSONS PER SQUARE MILE 2000 CENSUS	GS EMP AVG Sep 10 to Jun 11
Atlanta	13011	Banks Co. GA	38.24		61.7	1
Atlanta	01029	Cleburne Co. AL	37.02		25.2	21
Atlanta	13115	Floyd Co. GA	20.85	26.33	176.5	75
Atlanta	13123	Gilmer Co. GA	29.49	28.28	55.0	34
Atlanta	13129	Gordon Co. GA	18.48	23.37	124.0	14
Atlanta	13137	Habersham Co. GA	21.11	23.25	129.1	39
Atlanta	13157	Jackson Co. GA	53.24	58.62	121.5	26
Atlanta	13187	Lumpkin Co. GA	62.18	69.92	73.9	33
Atlanta	13211	Morgan Co. GA	54.18		44.2	4
Atlanta	01111	Randolph Co. AL	40.04	28.52	38.5	3
Atlanta	13263	Talbot Co. GA	45.96		16.5	0
Atlanta	13311	White Co. GA	39.33	43.07	82.6	2
Boston	33003	Carroll Co. NH	25.59	26.36	46.8	45
Buffalo	36121	Wyoming Co. NY	39.01	41.58	73.2	7
Chicago	17075	Iroquois Co. IL	32.38	34.71	28.1	9
Chicago	18149	Starke Co. IN	27.25	34.55	76.2	1
Cincinnati	39001	Adams Co. OH	30.12	30.36	46.8	2
Cincinnati	39071	Highland Co. OH	40.07	40.47	73.9	21
Cincinnati	21187	Owen Co. KY	31.27		30.0	4
Cincinnati	18137	Ripley Co. IN	53.72	55.37	59.4	4
Cincinnati	18155	Switzerland Co. IN	46.97		41.0	3
Cincinnati	18161	Union Co. IN	31.30		45.5	0
Cleveland	39043	Erie Co. OH	18.77	24.32	312.1	177
Cleveland	39169	Wayne Co. OH	24.43	25.11	200.9	74

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LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTE 2000 CENSUS	COMMUTE 2006-2008	POP DENSITY PERSONS PER SQUARE MILE 2000 CENSUS	GS EMP AVG Sep 10 to Jun 11
Columbus	39073	Hocking Co. OH	48.27	61.74	66.8	1
Columbus	39091	Logan Co. OH	24.02	22.21	100.4	41
Columbus	39119	Muskingum Co. OH	17.91	20.22	127.3	56
Columbus	39127	Perry Co. OH	50.91	61.45	83.2	5
Columbus	39131	Pike Co. OH	32.26	32.82	62.7	22
Columbus	39163	Vinton Co. OH	30.21		30.9	4
Dallas	40013	Bryan Co. OK	27.74	22.73	40.2	21
Dallas	48217	Hill Co. TX	29.16	30.15	33.6	19
Dallas	48223	Hopkins Co. TX	19.52	22.48	40.8	14
Dallas	48237	Jack Co. TX	34.86		9.6	4
Dallas	48337	Montague Co. TX	34.23		20.5	8
Dallas	48349	Navarro Co. TX	27.17	31.38	44.8	23
Dallas	48379	Rains Co. TX	53.91		39.4	0
Dallas	48467	Van Zandt Co. TX	46.36	49.02	56.7	9
Dayton	39149	Shelby Co. OH	28.52	31.61	117.1	7
Detroit	26151	Sanilac Co. MI	39.09	39.06	46.2	10
Detroit	26157	Tuscola Co. MI	24.74	24.99	71.7	18
Houston	48089	Colorado Co. TX	23.21	25.84	21.2	10
Houston	48185	Grimes Co. TX	31.74	36.55	29.7	4
Houston	48313	Madison Co. TX	25.78		27.6	1
Houston	48373	Polk Co. TX	27.94	32.44	38.9	36
Houston	48455	Trinity Co. TX	39.81		19.9	1
Houston	48477	Washington Co. TX	19.70	22.23	49.9	14
Houston	48481	Wharton Co. TX	29.22	33.15	37.8	13
Huntsville	47103	Lincoln Co. TN	27.25	31.48	55.0	5
Huntsville	01095	Marshall Co. AL	17.48	20.50	145.0	116

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LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTE 2000 CENSUS	COMMUTE 2006-2008	POP DENSITY PERSONS PER SQUARE MILE 2000 CENSUS	GS EMP AVG Sep 10 to Jun 11
Indianapolis	18031	Decatur Co. IN	22.94	30.33	65.9	15
Indianapolis	18035	Delaware Co. IN	18.51	20.59	302.0	59
Indianapolis	18045	Fountain Co. IN	21.25		45.4	9
Indianapolis	18071	Jackson Co. IN	30.11	33.64	81.2	6
Indianapolis	18139	Rush Co. IN	53.48		44.7	2
Milwaukee	55055	Jefferson Co. WI	23.76	26.61	132.9	39
Milwaukee	55127	Walworth Co. WI	25.78	25.66	168.8	14
Minneapolis	27065	Kanabec Co. MN	37.43		28.6	10
Minneapolis	27079	Le Sueur Co. MN	38.29	51.31	56.7	4
Minneapolis	27093	Meeker Co. MN	54.95	63.14	37.2	23
Minneapolis	27095	Mille Lacs Co. MN	58.34	65.15	38.9	3
Minneapolis	27097	Morrison Co. MN	29.66	31.82	28.2	155
Minneapolis	27115	Pine Co. MN	32.00	32.49	18.8	213
Minneapolis	55095	Polk Co. WI	39.27	43.77	45.0	51
Minneapolis	27143	Sibley Co. MN	39.67		26.1	4
Minneapolis	27147	Steele Co. MN	15.53	20.70	78.4	2
Minneapolis	27153	Todd Co. MN	16.02	21.60	25.9	19
New York	36105	Sullivan Co. NY	40.68	37.22	76.3	30
Pittsburgh	42059	Greene Co. PA	43.62	45.20	70.6	32
Pittsburgh	42063	Indiana Co. PA	24.45	23.19	108.1	52
Portland	53015	Cowlitz Co. WA	22.17	31.27	81.6	78
Raleigh	37033	Caswell Co. NC	16.85	22.97	55.3	2
Raleigh	37077	Granville Co. NC	62.09	65.58	91.3	1263

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LOCALITY PAY AREA	COUNTY CODE	COUNTY NAME	COMMUTE 2000 CENSUS	COMMUTE 2006-2008	POP DENSITY PERSONS PER SQUARE MILE 2000 CENSUS	GS EMP AVG Sep 10 to Jun 11
Raleigh	37105	Lee Co. NC	47.77	49.20	190.6	57
Raleigh	37181	Vance Co. NC	22.08	27.21	169.4	34
Richmond	51029	Buckingham Co. VA	22.24		26.9	2
Richmond	51057	Essex Co. VA	34.64		38.8	7
Richmond	51081	Greensville Co. VA	22.75		39.1	0
Richmond	51119	Middlesex Co. VA	21.87		76.2	0
Richmond	51135	Nottoway Co. VA	36.25		50.0	179
Richmond	51147	Prince Edward Co. VA	22.26	10.08	55.9	27
Sacramento	06003	Alpine Co. CA	55.64		1.6	9
Sacramento	06005	Amador Co. CA	22.02	25.15	59.2	40
Sacramento	06011	Colusa Co. CA	25.39	30.47	16.3	39
Sacramento	06091	Sierra Co. CA	22.41		3.7	47
San Jose	06033	Lake Co. CA	17.89	20.44	46.4	74
Seattle	53027	Grays Harbor Co. WA	16.06	20.06	35.1	47
Seattle	53041	Lewis Co. WA	26.54	29.03	28.5	66
Washington	24011	Caroline Co. MD	20.76	27.16	93.0	12
Washington	54031	Hardy Co. WV	21.05		21.7	25
Washington	24029	Kent Co. MD	31.19	27.91	68.7	13
Washington	51113	Madison Co. VA	35.37		39.0	21
Washington	51137	Orange Co. VA	40.00	60.65	75.7	8
Washington	51139	Page Co. VA	14.81	21.70	74.5	111
Washington	51157	Rappahannock Co. VA	103.14		26.2	9
Washington	51171	Shenandoah Co. VA	33.68	38.39	68.5	48
Washington	24041	Talbot Co. MD	18.65	20.03	125.6	28
Total						4,049

Commuting between <u>Proposed</u> New Pay Areas and Adjacent Counties not in a Multi-County Metropolitan Area				
MET	NAME	2000 Commuting	2006-2008 COMMUTE	GS Empl Avg Sep 10 to Jun 11
Albany	Greene Co. NY	45.51%	46.91%	8
Albany	Hamilton Co. NY	26.33%		2
Charlotte	Chesterfield Co. SC	23.48%	29.47%	16
Harrisburg	Juniata Co. PA	28.29%	28.86%	24