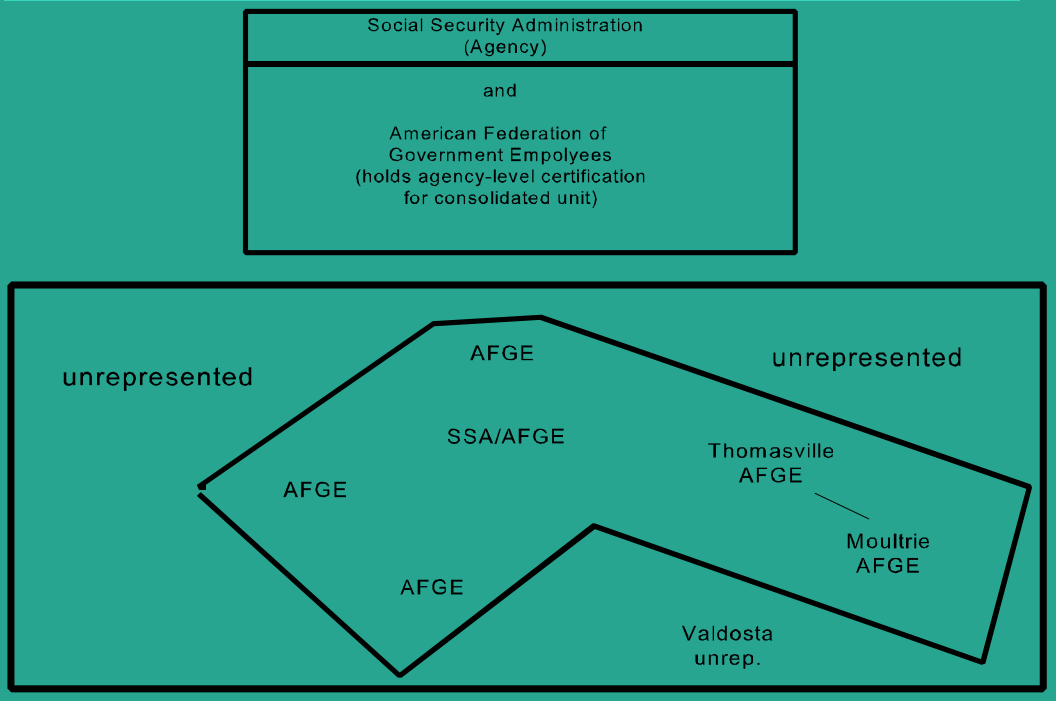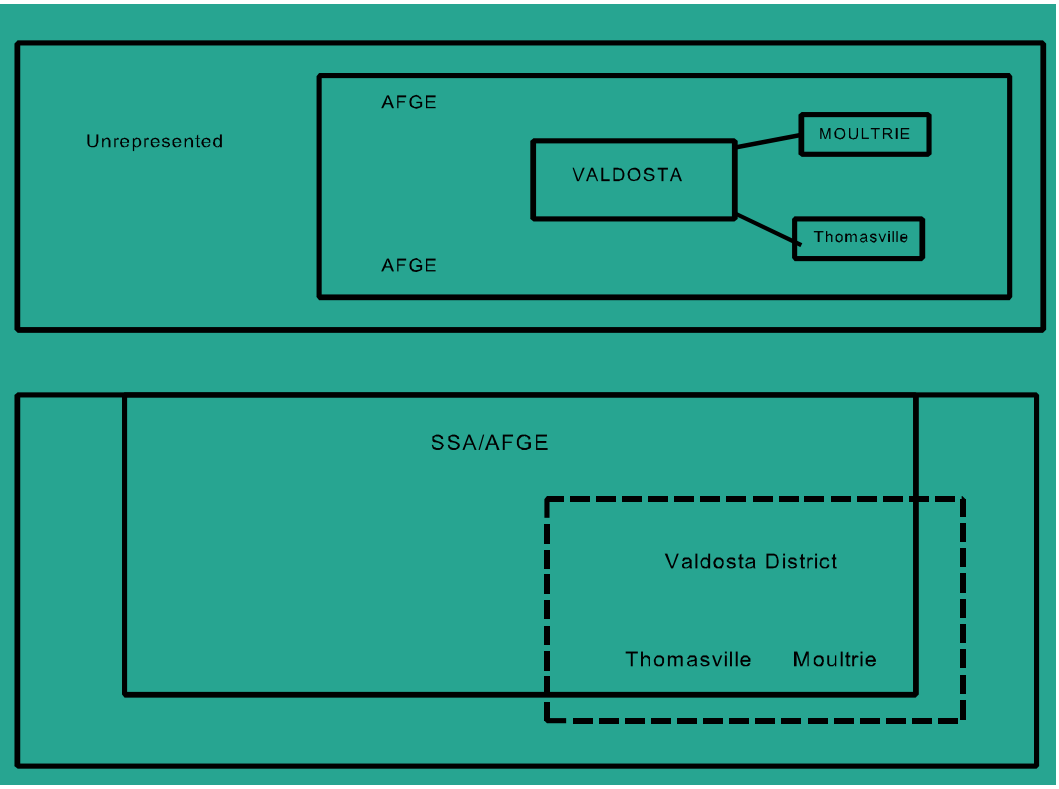SSA, 52 FLRA 1084 (1997)