

****Title**:** Amelia Aquino, et al. vs. Philippine Ports Authority

****Facts**:**

- On August 21, 1989, Republic Act No. 6758, known as The Salary Standardization Law, was passed by the Philippine Congress, setting a revised compensation and position classification in the government.
- Prior to this, under Letter of Implementation No. 97 issued by President Marcos on August 31, 1979, the Philippine Ports Authority (PPA) granted its managers and supervisors a representation and transportation allowance (RATA) equivalent to 40% of their basic salary.
- Post-RA 6758, the PPA adjusted the RATA from 20% (Memorandum Circular No. 36-89, October 23, 1989) to 40% based on standardized salary rates (Memorandum Circular No. 46-90, November 14, 1990).
- The Commission on Audit (COA) disallowed the RATA payments in post-audit, leading to a petition filed to the Supreme Court by PPA officials, claiming entitlement to the RATA under LOI No. 97. The case was titled “Philippine Ports Authority vs. Commission on Audit, et al.” and decided on October 16, 1992, favoring COA.
- Following that decision, PPA had two categories of officials in relation to RATA benefits: those entitled (incumbents as of July 1, 1989) and those not (appointed or promoted after July 1, 1989).
- Petitioners, who are “second category” PPA officials, filed a Petition for Mandamus and Prohibition with the RTC on July 26, 2000, claiming entitlement to RATA based on purported new developments in jurisprudence and governmental issuances.
- The RTC initially dismissed the petition due to res judicata, but the case advanced to the CA and eventually returned to RTC for full proceedings, culminating in a favorable decision for petitioners on August 10, 2005, later reversed by the CA on August 29, 2007.

****Issues**:**

1. Is the principle of res judicata applicable given the final decision of the CA in CA.G.R. SP No. 64702?
2. Did the denial of petitioners’ claims for 40% RATA violate their constitutional right to equal protection?
3. Are petitioners entitled to 40% RATA without having to refund the RATA already received?

****Court’s Decision**:**

- The Supreme Court found no merit in the petitioners’ argument against res judicata, adhering instead to stare decisis, ensuring stability in judicial decisions. It emphasized that

legal precedents following the PPA vs. COA case have consistently interpreted RA 6758 to mean that only incumbents as of July 1, 1989, who were receiving allowances are entitled to continue doing so.

- It ruled that petitioners, who were not incumbents by that specific cutoff date, are not entitled to 40% RATA, adhering to earlier jurisprudence without denying petitioners their constitutional rights to equal protection.
- On the issue of refund, the Court noted it unnecessary to delve into it, reinforcing that its resolution in the earlier PPA case remains binding.

****Doctrine****:

The case reiterated the doctrine of stare decisis, signifying the importance of adhering to legal precedents to ensure certainty and stability in judicial decisions. It upheld the specific application of allowances and benefits under Section 12 of RA 6758, emphasizing that such benefits are reserved only for incumbents as of July 1, 1989.

****Class Notes****:

- ****Stare decisis****: Legal principle of determining points in litigation according to precedent.
- ****Res judicata****: Ensures finality of judgments and bars re-litigation of cases on the same issue between the same parties where a final decision has been rendered.
- ****RA 6758 (Salary Standardization Law)****: Standardizes salaries compensated to government officials and employees to ensure fairness and equity.
- ****Equal Protection Clause****: Part of the Constitution which mandates that no person or class of persons shall be deprived of the same protection of the laws which is enjoyed by other persons or other classes in like circumstances.

****Historical Background****:

This case reflects the complexities inherent in the Philippine government's attempt to standardize the compensation system for its employees through RA 6758 amidst pre-existing benefits and allowances structures established by different government-owned and controlled corporations like the PPA. The contention over RATA payments underscores the challenges of aligning old systems with new legal frameworks while balancing the rights and expectations of government employees.