



United States
**Office of
Personnel Management**

Philadelphia Oversight Division
William J. Green, Jr. Federal Building
600 Arch Street
Philadelphia, Pennsylvania 19106-1596

OPM Decision Number: C-856-09-01, 8/5/97

In Reply Refer To:

Your Reference:

PH:OD:97-15

PERSONAL

[appellant's name]
[organizational name]
[name] Air Reserve Base
[activity location]

Dear [appellant's name]:

This is our decision on the classification appeal filed with our office that we accepted under the authority contained in section 5112(b) of title 5, U.S. Code (U.S.C.).

This appellate decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing and accounting officials of the Government. It is the final administrative decision on the classification of this position, and is not subject to further appeal. It is subject to review only under limited conditions and time limits specified in title 5, Code of Federal Regulations (CFR) 511.603 and 511.613, and in the Introduction to the Position Classification Standards (Introduction), Appendix 4. It must be implemented according to the provisions contained in 5 CFR 511.612.

Position Information

Appellants : [names of appellant and four co-appellants]
Current Classification : Electronics Technician,
GS-856-9
Position Description No. : 8-01231-0
Requested Classification : Electronics Technician,
GS-856-11/12
OPM Decision : Electronics Technician,
GS-856-9

Organizational Information: U.S. Air Force
[organizational name]
Communications - Electronics
Maintenance Section
[name] Air Reserve Base (ARB)
[activity location]

Analysis and Decision

In considering your appeal, we carefully reviewed all the information that you submitted; information developed during a telephone audit with you on July 23, 1997; a telephone interview with your immediate supervisor, [name]r, Supervisory Electronics Technician, GS-856-11 on July 22, 1997; a telephone interview with your second level supervisor, [name], Telecommunications Manager, GS-391-12 on July 26, 1997; and, other pertinent classification information provided by both you and your employing activity at our request.

It is our decision that your position is classified correctly as Electronics Technician, GS-856-9. Accordingly, your appeal is denied for the reasons discussed below.

In your appeal letter of May 6, 1997, you stated you feel your position is graded improperly at the GS-9 level and "should be assigned the GS-11/12 level under the Department of Transportation Guide." With your appeal, you submitted copies of Air Force and Federal Aviation Administration (FAA) documents that you believe support your claim. In addition, you outlined the background of the classification of your position.

Previously, your position was classified as Electronics Mechanic, WG-2604-11. The U.S. Department of Defense Civilian Personnel Management Service (CPMS) received a group classification appeal from you and your co-appellants on April 17, 1995, requesting reclassification to Electronics Technician, GS-856-11/12. On January 23, 1996, CPMS issued a classification decision certifying your position as an Electronics Technician, GS-856. The appeal was remanded to Westover ARB for grade determination within the General Schedule pay plan. The Civilian Personnel Office at Westover ARB classified your position as Electronics Technician, GS-856-9.

On April 8, 1996, CPMS received another classification appeal from you requesting reclassification of your position to Electronics Technician, GS-856-11. On June 11, 1996, CPMS issued an appeal decision denying your appeal and upholding your activity's classification of your position as Electronics Technician, GS-856-9.

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In your appeal to us, you highlighted the portions of the CPMS appeal decision you feel do not correctly portray the responsibilities of your position and provided rationale for your opinion. In addition, you contacted the FAA and “spoke with classifiers who specialize in the Air Traffic Control and Landing Systems (ATCALs) field.” You continued “. . . (s)ince the FAA sets the standard for flight safety and policy, we are inclined to agree with their interpretation.”

All positions subject to the Classification Law contained in 5 U.S.C., must be classified in conformance with the published position classification standards issued by the U.S. Office of Personnel Management (OPM) or, if there are no directly applicable Position Classification Standards (PCS's), consistently with PCS's for related work. Therefore, other methods or factors of evaluation, such as comparison to other positions that may or may not be classified correctly, are not authorized for use in determining the classification of a position. The classification appeal process is a de novo review that includes a determination as to these duties and responsibilities. Thus, the classification review methodology and conclusions drawn by your agency previously, or other agencies, have no bearing on our adjudication of your appeal.

Our fact-finding revealed your position description (PD) of record accurately reflects the major duties and responsibilities assigned to your position and performed by you and your co-appellants. Therefore, we hereby incorporate your PD of record by reference into this decision. You perform on-site certification and maintenance of the ATCALs; diagnose the cause of equipment degradation and malfunctions through application of electronic theory, system analysis, test equipment, schematics, wiring diagrams, and mathematical analysis; reconfigure and modify parameters, thresholds and software on equipment; troubleshoot “state of the art” equipment to localize, isolate and accomplish necessary repairs; replace, adjust or repair malfunctioning components; test and inspect restored equipment; in emergency situations, develop and institute changes in procedures to expedite corrective action and insure continuous system operations; coordinate the sequencing of, and participate in, official FAA flight inspections; accomplish time compliance technical order modifications and equipment engineering changes; utilize precision test equipment; and, maintain adequate stock levels of required parts. Equipment worked on includes navigational aids (NAVAIDS), ground radio, meteorological, radar and security equipment.

During the telephone audit, you stated, and your supervisors confirmed, that the predominant duties of your position involve maintaining ATCALs. [name of second level supervisor] did not specify a percentage of time but did say you spent the majority of time maintaining ATCALs. You stated you spent 75 percent of your time

on ATCALs. [name of first level supervisor] stated you spent 50 percent of time of this equipment.

Our fact-finding revealed you do spend at least 50 percent of your time on ATCALs. The remaining time is spent on maintaining and repairing radio, security, and meteorological equipment. We note, however, that while there are seven technicians assigned to the same PD, the organization chart for your section states that there are three Electronics Technicians, GS-856-9 assigned to MET NAV maintenance; three to ground radio maintenance; and, one to security communications maintenance. While both supervisors support the facts that you and your co-appellants must be skilled in the maintenance of all the equipment and a majority of time is spent on the ATCALs maintenance, it is apparent that the estimate of 50 percent of time on ATCALs equipment given by Mr. LaFleur is supported by organization information. Your remaining work time, less than 50 percent is spent performing duties **not** covered by the DOT Position Classification Guide for Electronics Technician Positions, GS-856, of December 1972 (DOT Guide). The ATCALs support work is covered by the DOT Guide.

The classification of a position requires that only those skills, knowledges, and qualifications that are of significance in performing the grade controlling work of a position be considered in the classification analysis process.

Under the provisions of 5 U.S.C. 5102, the first step in the position classification process is to decide whether the position is covered by the General Schedule (GS). The decision as to the classification system in which a position belongs in turn determines the skills, knowledges, abilities and responsibilities that determine the grade level worth of the work. Section 5102(c)(7) exempts from coverage under the General Schedule those:

employees in recognized trades or crafts, or other skilled mechanical crafts, or unskilled, semi-skilled, or skilled manual-labor occupations, and other employees including foremen and supervisors in positions having trade, craft, or laboring experience and knowledge as the paramount requirement.

The OPM Introduction on page 26, states that:

the 'paramount requirement' of a position refers to the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether particular types of positions are trades, crafts, or manual labor occupations within the meaning of title 5 depends

primarily on the duties, responsibilities, and qualification requirements, i.e., the most important, or chief, requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring experience and knowledge as a requirement for the performance of its primary duty, the position is under the Federal Wage System regardless of its organizational location or the nature of the activity in which it exists.

The Introduction goes on to say that "A position is exempt from the General Schedule if its primary duty involves the performance of physical work which requires knowledge or experience of a trade, craft, or manual labor nature," and that "A position is subject to the General Schedule, even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual-labor work."

The Introduction to the Electronic Equipment Installation and Maintenance Family, WG-2600 provides additional guidance on differentiating between FWS and GS work. This guidance states that in distinguishing between electronics mechanic (FWS) and electronics technician (GS) work, "the differences between the electronics mechanics and technicians are not so much in the types of skills, knowledges, and abilities possessed but in the degree to which they are possessed and the manner in which they are used."

In evaluating repair work, performing repairs is considered trades work, while performing similar work with such engineering functions as "developing and designing test and repair equipment, analyzing present repair practices and developing procedural instructions for use by others on the methods and steps of equipment repair, or conducting engineering evaluations of the adequacy of such things as test and evaluation equipment used in making repairs" is GS technician work. In assessing maintenance work, performing preventive and corrective maintenance is considered trades work, while performing similar work with such engineering functions as "the development of maintenance standards and procedures for use by others, the engineering test and evaluation of new or modified electronic systems, or analyzing the compatibility of interlocking components, systems, and equipment for the purpose of redesign of the equipment to increase compatibility" is GS technician work.

Based on our fact-finding and the above, we conclude that the work performed on equipment, other than ATCALs, is classified correctly to the FWS. However, since the ATCALs work is covered by the DOT Guide; classified correctly to the GS; and,

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constitutes the primary and paramount purpose for the existence of your position, we will address only those duties covered under the GS.

The crux of your appeal is that your position should be classified using the DOT guide and application of this Guide should result in allocation at the GS-11/12 level. You stated you position was classified differently than positions within the FAA:

The FAA Department of Transportation policy with regard to military maintained facilities used in National Air Space (NAS), is to accept military certification based upon the current mutually acceptable standards and tolerances . . . The Department of Transportation realizes that equipment used in National Air Space is all maintained to the same standard throughout the FAA. The nature of work is the same. The same equipment is used throughout the U.S., so the skills and knowledge are also the same. To simplify the system, their grading is based on the number of complex systems certified by a technician. We submit that since we perform the same functions, with the added responsibilities inherent to military facilities also used commercially, we should be graded accordingly.

You stated that the information relied upon by the CPMS adjudicator was not fully accurate:

Overall evaluation was attained using the following incorrect information. She felt that the supervisors direct observation of maintenance and repair operations was the only basis that credits the technician with system certification. The position was assessed as work on a subsystem or equivalent level work in a complex number of subsystems within one or more complex systems, or independent certification responsibility for one complex system as primary work was not evident. A formal certification program that credits the technician to certify equipment was not described as specified in the DOT Guide. We disagree.

As part of your appeal you submitted FAA Order 6000.1B, subject: Navigation Facilities in the National Airspace System. It states:

FAA policy with regard to military-maintained facilities used in the NAS is to accept military certification based upon the current mutually-acceptable standards and tolerances.

You claim since you “certify” ATCALs for being within standards and tolerances, you have independent certification responsibility. The FAA classification guide defines certified personnel as:

. . . technicians who hold credentials attesting to their possession of the knowledges and skills required to certify certain systems, subsystems, or equipment. Note: The FAA Airway Facilities maintenance personnel certification program established minimum standards of employee proficiency by written and applied examinations to assure the technical competence of all maintenance personnel having direct responsibility for the continued safe operation of ground systems critical to air navigation and air traffic control.

Our fact-finding revealed that, while your supervisor must “certify” you are able to perform core competency maintenance and repair operations on ATCALs, this certification is based primarily on observation of the work. There are no specific formal training programs or classes you must complete in order to obtain certification. When questioned about this, you stated that most of the technicians had military training but some were previously contractors. You said you took formal training when “slots” and funding were available. You also said some training was available on CD-Rom.

We contacted a party knowledgeable about FAA’s training program for technicians. We learned that it is a highly standardized program consisting of several formalized training classes. Participants must pass vigorous written tests before completion of the program FAA’s policy is that all technicians must complete the training program before becoming “certified” even if they have been trained by another agency. FAA does not consider the training programs offered by other agencies as meeting their certification requirements.

The DOT Guide states certification includes “. . . independent determination as to when a system or subsystem should be continued in, restored to, or removed from service.” When questioned about who maintains the authority to “take down” ATCALs due to maintenance or repair, you stated the air traffic controllers in the tower retain this final authority. You also stated, however, the air traffic controllers always take your recommendations.

Another consideration used in the DOT Guide is the type of facility where the technicians work. [activity name] ARB is a Terminal Instrument Procedures (TERP) facility. A TERP facility is a navigational aid that is:

Critical to the formation of an approach fix (initial, intermediate, final, or missed) or holding fix (as published in Department of Commerce and Department of Defense Instrument Approach Procedures) that is within 50 nautical miles of an airport having 50,000 or more annual primary instrument operations (excluding overflights and secondary, and Stage III operations) and air traffic service provided by a Level III or IV Limited Radar Approach Control Facility.

[activity name] ARB is located within 17 nautical miles of [name] International Airport. [activity name] is used mainly for military aircraft. There is also a small commercial portion of the base used mainly for private aircraft. There are a limited number of flights (less than 10 per day) using the commercial airport.

You stated since Westover is a TERP facility, you have the same requirements as the FAA technicians at [international airport name] for keeping ATCALS in operational order. Our fact-finding did not find this to be correct.

The navigational aids (NAVAIDS) at [activity name] may be used by aircraft using [international airport name]. If the equipment at [international airport name] is working properly, [activity name] equipment is not critical to operations continuing at [international airport name]. In addition, both you and [first level supervisor's name] stated that you do not know how many aircraft are flying over and utilizing Westover's equipment. When questioned about the consequences to overhead flights of your equipment being out of function, both you and [first level supervisor's name] stated the aircraft would use equipment at other airfields.

Westover ARB has two runways. One runs north to south and the other from east to west. Aircraft can land from either direction, i.e., south to north and west to east. Only one runway has instrument landing systems. That runway has dual instrumentation, i.e., identical equipment at either end of the runway. This means that if the equipment at one end of the runway is not functioning, aircraft can land from the direction where the equipment is operational. None of the interviewees involved in our fact-finding process could remember when the runways were ever closed due to non-functioning equipment. [first level supervisor's name] stated that even if all the landing equipment were not functioning, if the weather were clear, aircraft could execute visual take offs and landings. This is supported by the fact that recently one of the ATCALS was down for five months awaiting repair parts and there was no effect on Westover's operations.

Based on the above, we conclude that your position is covered minimally by the DOT Guide.

Series and Title Determination

As stated previously, you filed a previous classification appeal in 1995 when your position was classified as Electronics Mechanic, WG-2604-11. The result of that appeal was to place your position in the GS-856 series. Based on our fact-finding and the above, we agree with this analysis. You do not disagree with your position being classified to the GS-856 series with which we agree. Based on the titling practices pertaining to the GS-856 series, we find your position is properly allocated as Electronics Technician, GS-856.

Grade Level Determination

As stated previously, your position is classified correctly by use of the DOT Guide for Electronics Technician positions. It uses four factors to determine the correct grade level of positions. They are: work assignments, nature of work, skills and knowledges, and supervision. In addition, the guide contains system complexity level guidance. [activity name] ARB has six ATCALs at the Category II level.

Work Assignments

At the GS-9 level, technicians have attained an experience level where they can normally be assigned the analysis, repair and evaluation of a subsystem or equivalent level work in a complex electronic system. They are sufficiently proficient to do productive maintenance work and are given specific assignments.

At the GS-11 level, technicians at locations that do not have large accumulations of equipment, are assigned independent certification responsibilities for one complex system as the primary work plus secondary duties, if necessary, to complete a staff-year workload. The DOT Guide further explains:

Because of their critical relationships to the operation of the Air Route Traffic Control Center, for purposes of this guide, the Remote Center Air Ground (RCAG) facility and the Radar Microwave Link Repeater (RMLR) facility are considered within the scope of GS-11 level work. Assignment of either, plus additional work if needed to complete a man-year workload, will satisfy the above criteria.

Technicians at the GS-11 level perform the most complex electronic maintenance work found at a facility and, as a group, provide the highly skilled talent required to maintain the continuous operation of equipment. Their work involves investigating, analyzing, testing, diagnosing, correcting and tuning the most complex electronic equipment to restore or insure continuous and reliable operation. Work assignments

normally include full maintenance certification responsibility for two or more complex systems. The DOT guide states:

The GS-12 technician has a skill and knowledge background that enables him to assume any type of assignment and certify upon its completion that the equipment involved is safe for operational use by the flying public.

Your position does not meet the intent of either the GS-11 or GS-12 levels. While on the surface it appears the positions at [activity name] require more complex skills and knowledges due to the presence of six Category II systems, this is an erroneous conclusion. The level of work assignments described in the DOT guide require a depth of skill and knowledge so complex that a technician can only be skilled in one or two of these systems. The fact that you are responsible for all of the ATCALS, and also radio, meteorological and security equipment, shows your work assignments do not reflect the depth and demands of investigating, analyzing, testing, diagnosing, correcting and tuning equipment as those positions described at the GS-11 and GS-12 levels.

Nature of Work

GS-9 technicians work in high density locations associated with large numbers of complex electronic systems. Typical duty assignments encompass analyzing, repairing and evaluating a subsystem of higher order systems in radar, navigational, communication or data specializations. Especially important to the GS-9 electronics technician is the understanding of how the equipment interfaces with other equipment and other facilities.

GS-11 technicians, while performing less complex work, are under the same working pressures as those imposed on the higher grade employees. Their work is performed in high level traffic locations and the requirements for rapid equipment restoration is always paramount. Their work involves maintenance on a number of types of electronic systems and the assumption of operational responsibility for large segments of these systems or responsibility for one complex system plus additional work.

At the GS-12 level, technicians assume system certification responsibility for the several systems assigned. The demands for high priority restoration of all systems are typical of the work environment of this level. A GS-12 technician spends a substantial amount of time on corrective maintenance resolving the more difficult electronic problems. These are not only characterized by the requirements for an in-

depth theoretical knowledge in their resolution but also the ability to trace such problems through interfacing equipments.

Your position does not meet the intent of the GS-9, GS-11 or GS-12 levels. Your position, while **near** a high density airport, does not have the requirements for rapid equipment restoration described in the DOT guide. As described previously, if the equipment at [activity name] is not functioning, it does not have an adverse effect on aircraft operating in and out of [international airport name]. This is further evidenced by the fact that an ACTAL at [activity name] was not operational for five months with any significant operational problems.

Since your position does not meet the full intent of the GS-9 level, the lowest grade described, we must reduce the level assigned to this factor to the next lower level of GS-7 according to established classification principles and practices.

Skills and Knowledges

GS-9 technicians are required to develop skills and knowledges to perform technical analysis and corrective procedures within extremely short deadlines or minimum time periods.

At the GS-11 level, the work requires both theoretical and operational knowledge of the equipment assigned. This is acquired through either formal classroom training furnished by FAA or equivalent training and experience.

The skills and knowledges of the GS-12 technicians are normally the accumulated product of numerous hours of formal training offered by FAA in the course of a career. Beyond this, however, the technicians characteristically are selected for additional long periods of specialized training on the maintenance of the newest and more complex electronic systems. The skills and knowledges represent the highest technical training available.

Your position meets the GS-9 level. Our fact-finding revealed you and your co-appellants are required to perform maintenance and repair processes as quickly as possible. You do not, however, have the same critical time factors described at the higher grade levels. Your position does not meet the intent of the GS-11 level and clearly falls far short of the GS-12 level.

As discussed previously, the FAA requires their technicians to complete extensive, formalized training programs to receive certification authority and be considered for the higher level positions. Your position, while it requires some formal training, does not require completion of a formalized training program. Certification authority is

granted upon the demonstrated ability to perform core maintenance and repair tasks. This fact is evidenced further by FAA refusal to accept the training provided to technicians by other agencies as equivalent to their training program. All new FAA technicians, no matter their background, must complete FAA's training program for technicians.

Supervision

At the GS-9 level, technicians normally work independently during the progress of maintenance work on a subsystem. If working on full systems, work is checked in progress and upon completion for technical accuracy, and conformance with established maintenance procedures and policies.

A GS-11 technician works independently and typically his work is checked only upon completion or by the evident satisfactory operation of the equipment. He obtains assistance, when needed on the most complex problems, from higher grade technicians or supervisory staff. He is expected, however, to demonstrate full competence within the range of his assignment and to develop his own approach in resolving problems.

At the GS-12 level, a technician is expected to perform his assignments with a minimum of technical supervision and assistance. He is considered a technical expert in his assignment and normally only those problems requiring equipment or circuit redesign would be referred to higher level.

You work without supervision and your work is not spot-checked. While this is more descriptive of positions at the GS-11 level, our fact-finding revealed you normally work in groups of two or more people. This fact, in combination with the lack of other complicating factors described above, precludes assigning GS-11 to this factor. Therefore, the next appropriate level, GS-9, is assigned.

Summary

Your position is a mix of GS and FWS duties. Since the GS duties, classifiable to the Electronics Technician, GS-856 series, constitute the primary and paramount purpose for the existence of your position, these duties control the classification of your position.

The four factors considered under the FAA position classification guide for Electronics Technician positions are evaluated as follows:

Work Assignments	= GS-9
Nature of Work	= GS-7
Skills and Knowledges	= GS-9
Supervision	= GS-9

Since the preponderance of factors are evaluated correctly at the GS-9 level, we conclude that this is the level that best exemplifies the overall duties and responsibilities of your position.

Therefore, we find your position is classified properly as Electronics Technician, GS-856-9.

Please be assured this decision is not intended to reflect on your ability, qualifications, or the quality of your performance. Rather, it reflects our evaluation of your position based on the application of published classification principles, practices, procedures and standards.

Please inform your co-appellants of our decision.

Sincerely,

/s/ 8/5/97

Robert D. Hendler
Classification Appeals Officer
Philadelphia Oversight Division

cc:

Civilian Personnel Officer
U.S. Department of the Air Force
[activity name and location]

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