U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs

Dallas Oversight Division
1100 Commerce Street, Room 441
Dallas, TX 75242

Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant:	[appellant] et al.
Agency classification:	Air Traffic Control Specialist (Terminal) GS-2152-11
Organization:	Air Traffic Control Branch Airfield Operations Division [organization] Marine Corps Air Station Department of the Navy [geographic location]
OPM decision:	Air Traffic Control Specialist (Terminal) GS-2152-11
OPM decision number:	C-2152-11-04

/s/

Bonnie J. Brandon
Classification Appeals Officer

February 28, 2003

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

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Introduction

The Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant] on September 4, 2002. [appellant], an Air Traffic Control Specialist (Terminal), GS-2152-11, is also the designated group representative for 10 other Air Traffic Control Specialists: [names of appellants]. The appellants are assigned to position description number [number], located in the Air Traffic Control Branch, Airfield Operations Division, [organization], Marine Corps Air Station (MCAS), Department of the Navy, in [location]. We received the agency's administrative report, which provides information necessary for analysis of the appealed position, on October 2, 2002. The appellants' position was downgraded from GS-13 to GS-11 after the Department of the Navy required a consistency review of Marine Corps civilian Air Traffic Control Specialist positions. The appellants disagreed with the downgrading of their positions, believing that their positions should be classified as Air Traffic Control Specialist, GS-2152-13, and filed a classification appeal with the Department of Defense Civilian Personnel Management Service (CPMS). CPMS sustained the grade of the appellants' positions at GS-11. The appellants continue to believe that the appropriate grade for their position is GS-13. We have accepted and decided the appeal under section 5112 of title 5, United States Code.

To help decide the appeal, an OPM representative conducted a telephone audit with the designated group representative. We also conducted telephone interviews the appellants' immediate supervisor. We considered all of the information obtained during these interviews as well as the written materials provided by the appellant and his agency.

Position information

The MCAS [name] is a joint-use military and civilian facility that has been delegated approach control authority by the Federal Aviation Administration (FAA) for both military and civilian operations. The MCAS provides all air traffic control, crash crew services, and security and maintains the runways and taxiways for the facility. MCAS Yuma also has been delegated en route traffic control for [name] Air Route Traffic Control Center (ARTCC) sector [number] and a portion of [name] ARTCC sector [number] by the FAA. Additionally, MCAS [name] has been certified for initial and advanced training of air traffic control personnel.

The primary mission of MCAS [name] is to support aerial weapons training for the Atlantic and Pacific Navy and Marine forces. It serves as a base of operations for a number of units, including Marine Aviation Weapons and Tactics Squadron-[number], Marine Aircraft Wing-[number] units, Marine Wing Support Squadron, and Combat Service Support Detachment-[number]. As the scheduling authority for the [name] Training Range Complex, MCAS [name] provides fleet squadrons with access to 10,000 square miles of special-use airspace designated for military aviation training and approximately 2,000 square miles of land reserved for aerial bombing and gunnery ranges.

The appellants' positions are 11 of 21 civilian positions divided among three working teams, including military controllers, who are assigned to the air traffic control facility at MCAS [name]. The appellants are qualified for and regularly rotate among all positions located in both

the radar section and the control tower. They provide air traffic control services, including sequencing, separation, advisories, vectoring, and initiating, relaying, and issuing air traffic control clearances and instructions under normal and emergency flight conditions. The appellants decide among themselves who will fill what positions within the control tower and radar section and how they will rotate through them during the workday. The position description indicates 30 percent of the time involves control tower work and the remaining 70 percent, radar work. The appellants may perform "watch supervisor" duties for up to 10 percent of the time spent in the tower and 15 percent of the time while performing radar work. When acting as the control tower watch supervisor, the appellants are responsible for overseeing the technical operations of the four positions, which include Local Controller, Ground Control, Tower Coordinator, and Tower Fight Data. As the radar section watch supervisor, the appellants are responsible for overseeing the technical operations of eight positions that include Radar Approach/Departure Control, Approach Flight Data, Range Control, Range Flight Data, Clearance Delivery, Arrival Control, Arrival Fight Data, and Final Controller. As part of their watch supervisory duties, the appellants set up the training schedule for the day, establish priorities, and ensure that all air traffic control trainees complete required training on schedule.

In addition to their operational duties, the appellants each serve as a primary trainer/primary position instructor for one active duty military personnel. Training includes classroom and on-the-job training for trainees to qualify in each air traffic control position. The appellants ensure that safe and proper application of service is achieved while instructing their students in techniques and procedures for the various positions. The appellants also rotate through the Air Traffic Control Facility Watch Officer (FWO) position. The FWO is responsible for the overall operation and coordination between the activities of Radar and Tower controllers. The FWO also coordinates assignments of personnel and coordinates facility requirements relating to personnel, training, equipment, and supply. The FWO is in charge of the entire Air Traffic Control facility (tower and radar) and has the authority to act in management's behalf after normal working hours and to make decisions that may affect the entire base, especially during emergency situations.

The appellants' position description and other materials of record provide more information about their duties and responsibilities.

Series, title, and standard determination

We agree with the agency's classification of the appellants' position to the Air Traffic Control Series, GS-2152.

The objective of air traffic control is to ensure the safe, orderly, and expeditious movement of aircraft through the nation's airspace. This is accomplished along three major functional lines: preflight briefing and assistance and advisory services to pilots during flight, providing control and separation of en route air traffic, and control and separation of air traffic at airports. The appellants' position provides air traffic control services, including issuing air traffic control instructions and providing flight assistance to aircraft operating in or transiting through the airspace controlled by the terminal.

In addition to their regular terminal duties, the appellants also provide control and separation of en route air traffic for the [two names] sectors delegated to MCAS [name] by the FAA. However, the level of participation in this activity by the appellants does not constitute the major portion or purpose of their air traffic control duties. The paramount duties of the appellants are in providing air traffic control services for aircraft operating in or transiting through airspace controlled by the terminal. The GS-2152 classification standard specifies the title *Air Traffic Control Specialist (Terminal)* for such positions.

Although the appellants serve, on a rotational basis, as watch supervisors providing technical oversight of the control tower or radar section and serve as FWO for the facility, they do not exercise the level of supervision necessary to evaluate the work by reference to the General Schedule Supervisory Guide (GSSG). The GSSG requires that supervisory authorities must fully meet the intent of Factor Level 3-2. To meet this factor, supervisory duties must include planning work and preparing schedules for completion of work, evaluating work performance of subordinates, counseling or instructing employees on both work and administrative matters, interviewing candidates for positions, effecting minor disciplinary measures, and developing performance standards. The duties and responsibilities the appellants assume when functioning as "watch supervisors" and the FWO do not meet the level of supervision criteria established in Factor Level 3-2 of the GSSG. Therefore, the appellant's position is properly titled *Air Traffic Control Specialist (Terminal).* The Part II grading criteria of the GS-2152 standard are used to evaluate the duties required to control air traffic in terminal airspace.

Grade determination

The duties, responsibilities, and qualifications required to control air traffic in terminals vary according to the type of aircraft operations, i.e., visual flight rules (VFR) or instrument flight rules (IFR), and whether radar is used. Air traffic control terminals are divided into four major categories based on the primary type of control services provided. These categories are nonapproach control terminals, nonradar approach control terminals, limited radar approach control terminals, and radar approach control terminals.

There are two classification factors that differentiate work at the various grade levels for air traffic control positions in terminals: knowledge, skills, and abilities required of the controllers and the complexity of the control environment. The knowledge, skills, and abilities factor is directly related to the type of control services provided by the terminal and the various procedures and techniques that the controller must know and apply. The complexity of the control environment is influenced most significantly by the demands which the density and congestion of aircraft place on the skills, abilities, and judgment of the controller.

The GS-2152 standard provides guidance for measuring traffic density. For radar approach terminals, traffic density is based on the facility's total instrument flight rules (IFR) operations count. Traffic density is expressed in terms of the average hourly instrument operations handled during the day and evening shifts for the terminal's 183 busiest days of the year. This average of hourly instrument operations is computed by taking the total instrument traffic count for the 183 busiest days of the year, dividing that number by 183, and then dividing that result by 16 for terminals which are open from 16 to 24 hours. We examined the daily IFR operations count for

the period from October 1, 2001, to September 30, 2002. During that 12-month period, the MCAS [name]'s average number of hourly instrument operations was 29.5. The agency has included the en route traffic count in these numbers.

Knowledge, skills, and abilities required

This factor is directly related to the type of control services provided by the terminal and the various procedures and techniques that the controller must know and apply. In addition to the knowledge indicated for nonapproach, nonradar, and limited radar approach control terminals, controllers in terminal facilities who provide full radar approach control services for air traffic are required to possess a comprehensive knowledge of the operational requirements and techniques for providing radar control and separation of aircraft. Controllers in radar terminals must apply knowledge of the function and operation of the radar equipment, its various displays, the adjustment of the equipment, and the ability to detect malfunctions and interference.

GS-11 is typically the first full performance level of control work in radar approach control terminals. Radar control of air traffic is more difficult than the nonradar control described at GS-10 because, in addition to detailed knowledge of nonradar air traffic control, it requires a thorough knowledge of the functions and interference characteristics of radar systems, knowledge of and the ability to apply the reduced aircraft separation standards possible under radar, and the requirement to maintain a more positive and continuing control of aircraft.

At GS-12, the kinds of knowledge, skills, and abilities are similar to the GS-11 level. However, in comparison with the GS-11 radar controller who typically handles a light to medium (up to 19 instrument operations per hour) density of traffic, the GS-12 controller is faced regularly with peaks of heavy traffic. Under the more restrictive time and space limitations imposed by the greater density of traffic (average of 20–59 instrument operations per hour), there is the requirement for greater precision in determining appropriate aircraft movements and formulating control instructions; more intense and precise coordination among the controllers; consideration of the effect of action by any specific aircraft on a larger number of other aircraft in the terminal airspace; and consideration of a larger number of more rapidly changing aircraft positions and a greater variety of alternative actions for individual aircraft. Often this type of terminal provides radar services to a number of satellite airports. This requires the need to possess and apply knowledge of numerous procedures and airport configurations, procedures for satellite airports, noise abatement procedures, and complex runway problems which are substantially intensified by heavy traffic densities.

The appellants have detailed knowledge of nonradar air traffic control, thorough knowledge of the functions and interference characteristics of the radar systems under their control; knowledge of and the ability to apply the reduced aircraft separation standards possible under radar, and the requirement to maintain a more positive and continuing control of the aircraft. The radar section is equipped with active radar displays for approach and departure control, arrival and final control, and range control for the control of special use airspace including military operating areas and restricted airspace through established vertical limits. The control tower is equipped with an active radar display for monitoring aircraft arrivals and departures. The appellants have the ability to align the radar systems and troubleshoot any suspected interference or malfunction.

The appellants also provide technical training to air traffic control trainees including on-the-job and classroom training as part of their regular duties. Each appellant is assigned a student that he trains in each of the air traffic control positions. The appellants monitor training of the students and test them in each of the positions based on an established syllabus. They provide input as to the successful completion of student training or recommendations for extending the training period or removing a trainee from the program.

These knowledge, skills, and abilities are commonly associated with the GS-11 level. Although the reported traffic density of 29.5 meets the lower range of 20–59 described at the GS-12 level, the difference between grade levels in this standard is more than just numbers. The average operations per hour must be considered in context with other factors that affect the level of difficulty and responsibility of the appellants' position. At the GS-12 level, the standard describes controllers typically dealing with regular peaks of heavy density traffic, providing radar service to a number of satellite airports, and requiring knowledge of numerous procedures and airport configurations, procedures for satellite airports, noise abatement procedures, and complex runway problems that are substantially intensified by the heavy densities of traffic.

The primary mission of the MCAS is to support aerial weapons training for Atlantic and Pacific Navy and Marine forces as well as the locally assigned units. Peak flight activity occurs during these training periods. The number of daily IFR flights during this 12-month time period ranges from 1,022 during a major training period to 35, with the median being 349. Based on the FY 2002 data, the month of November accounts for the heaviest days of activity. Only 10 percent of the 183 busiest days used in determining the average operations involved 600 or more operations per day.

The IFR traffic count provided by the agency includes the en route traffic count for the airspace delegated by the FAA. Based on the agency's reports, that en route traffic accounts for approximately one third of the IFR operations reported. However, traffic density for en route traffic is calculated and factored differently for positions in Air Route Traffic Control Centers (Part III of the GS-2152 standard). The en route traffic handled by the appellants may only involve traffic passing through the airspace without requiring the terminal controllers to sequence the aircraft into or out of the terminal's airspace. Including this en route traffic count may result in an erroneous count for terminal positions.

Because the traffic operations are at the low end of the range, the complicating factors imposed by peak periods of traffic do not fully meet the intent of the GS-12 level of the standard. The service provided to satellite airports is very limited, as are the complexity of and procedures used for those airports. The noise abatement procedures and runway problems are not of the complexity to have significant impact. These facts further substantiate the determination that this factor does not fully meet the GS-12 level.

GS-11 is credited for this factor.

Complexity of the control environment

The complexity of controlling air traffic in terminals is influenced most significantly by the demands that the density and congestion of aircraft place on the skills, abilities, and judgment of the controller. As the level of air traffic increases significantly, there is a proportionally greater increase in the amount of coordination required among the controllers. Decisions on instructions to be issued to pilots become more critical. As the airspace becomes more congested, optional plans for the movement and control of aircraft are reduced. Increased numbers of aircraft require that controllers maintain increased alertness to a highly dynamic traffic picture.

The complexity of terminal controller positions may be further influenced by a number of environmental and operational factors which controllers must deal with in assuring the safe, orderly, and expeditious movement of aircraft. These factors include the varying mix in speed and performance characteristics of aircraft using the airport; limitations on the use of airspace imposed by such factors as noise abatement procedures, terrain, proximity of other airports, or the use of restrictive arrival and departure corridors; airport configuration in terms of runway and taxiway layout, lengths and capacities; and provision of control services for satellite or secondary airports.

At the GS-11 level, radar terminals typically require only a limited number of radar positions of operations, although some facilities may have a larger number of radar positions established, but are not operated during several hours of the day and evening shifts. Traffic demands are such that individual radar positions may handle more than one control function or assume responsibility for a relatively large segment of the terminal's airspace. Radar terminals at this level typically have fewer and less complex configurations of airspace than terminal control situations at higher levels. As a result, coordination for the use of airspace is more readily achieved at the GS-11 level.

Radar terminals at the GS-12 level, because of the heavy density of traffic present, generally require four to six radar positions to be operational during the day and evening shifts. Because of the traffic demands, these positions tend to become more specialized in the particular control functions that they perform, e.g., a particular position may handle only arrival or departure traffic.

More complex divisions of the control work and the assigned airspace are required at GS-12 than in the GS-11 work situation. Thus, more intricate procedures must be developed to ensure that the necessary coordination is effected among controllers. The complicating environmental and operational factors described at the GS-11 level are further intensified by the heavy density of traffic characteristic of the GS-12 level, normally 20-59 hourly instrument operations. Such factors as several busy runways, a substantial volume of helicopter traffic, provision of radar service to a number of satellite airports, and restrictive noise abatement procedures influence the already high level of difficulty and complexity characteristic of the GS-12 level.

The MCAS tower controls all personnel, vehicles, and aircraft operating on the airport movement areas and all airborne IFR/VFR aircraft from the ground to 2,500 feet within a 5.2-mile radius of the facility. The control tower is normally operated by five air traffic controllers

for the following positions: local controller, ground controller, tower flight data, tower coordinator, and tower supervisor.

The radar section is manned by seven to eight air traffic controller positions. The appellants are qualified for and rotate through all positions including radar approach/departure control, approach flight data, range control, range flight data, en route control, clearance delivery, arrival control, arrival flight data, final controller, and radar section watch supervisor. Not all radar positions are fully utilized for all of the operating hours each day. The geographic dispersion of the range complex requires additional positions beyond the requirements for normal terminal radar coverage. During periods when multiple ranges are active, extra radar positions will be monitored. Three additional positions are available for use during peak operations.

The radar controllers provide approach and departure control for IFR flights up to 7,000 feet within the terminal control area and monitor and coordinate the operations of the special use ranges and restricted areas. As the scheduling authority for the [name] Training Range Complex, MCAS [name] provides Atlantic and Pacific Fleet squadrons with access to 10,000 square miles of special use airspace designated for military aviation training and almost 2,000 square miles of underlying land reserved for aerial bombing and gunnery ranges. MCAS [name] maintains positive control of approximately five special use airspace areas including three complexes: the [number] complex with an established vertical limit up to 80,000 feet, the [name] Complex with a vertical limit of up to 40,000 feet, and the [name] Range Complex with its corresponding vertical limit of up to 80,000 feet. These special use areas are further subdivided into 25 stratified special use areas for air-to-air combat, electronic warfare, and air-to-ground live bombing and weapons firing activities. Controllers are responsible for monitoring aircraft to assure they remain within the geographic and altitude limitations of the area being used. The MCAS [name] also maintains positive control of the [name] Military Operating Area and an Air Traffic Control Assigned Airspace area used by air tankers as aloft refueling stations.

MCAS [name] is also responsible for providing air traffic services for one en route sector and a portion of another as delegated by the FAA. Using [name] as a reference point, this area covers approximately 100 nautical miles east to west and 70 nautical miles north from the [country] border. This includes IFR traffic up to 23,000 feet for regular airspace and up to the altitude limits of those special use areas. The en route control position is responsible for transitioning aircraft through the National Airspace System within the MCAS's airspace and must interact with pilots, other controllers at MCAS [name], other terminal facilities, and other ARTCCs. This position must maintain awareness of "hot" or active special use airspace and maintain open communications with the range control position. The en route control position is operated 24 hours a day, 7 days a week.

MCAS [name] has four intersecting runways of varying lengths, widths, and load bearing capabilities; multiple taxiways; and high-density parking ramps. General aviation aircraft are assigned to runways 8/26 and 17/35 at the northern edge of the facility. There are two longer parallel runways, 3/21 R/L, used primarily by the military and air carrier traffic. According to the airport's published statistics, 67 percent of the airport operations are military, 8 percent commercial, and the remaining 25 percent local and transient general aviation. [name] is not a

major air carrier airport. Two airlines each provide 5 flights per day, United Express to and from Los Angeles and America West to and from Phoenix.

There is a Combat Aircraft Loading Area for live ordnance, a "jammed gun" safety parking area, a high power engine run-up area, and a Tactical Airfield Fuel Dispensing System creating congested taxiways. MCAS [name] supports 80 percent of the U.S. Marine Corps' air-to-ground aviation training, hosting approximately 50 aviation units and aircraft from United States and North Atlantic Treaty Organization (NATO) forces. These deployments, ranging from a few days to weeks, bring 13,000 personnel and 1,000 aircraft to [city] annually.

MCAS controllers provide radar services to the [name] Army Air Field at the [installation], approximately 15 miles to the northeast. They provide radar and tower services as needed to a small, private airport at [city], located approximately two miles southwest of the facility, and flight following services to [name] Field about 10 miles southwest. This small public landing strip reports 94 operations per week, about 40 percent of them night military operations. MCAS [name] provides air traffic control services to a variety of aircraft with different capabilities and speed variations. The appellants indicate these aircraft include CH-46 and CH-53 helicopters, military F-14 through F-18 fighter jets; AV-8B Harrier vertical/short takeoff and landing (V/STOL) aircraft; A-18 aircraft; C-5 and C-117 heavy wide-body cargo planes; J-Star; Boeing 747, 737, and 707 air carriers; civilian cargo aircraft; and general aviation light aircraft. Pilot experience and capabilities range from student pilot to seasoned veteran. MCAS [name] may also serve foreign-national pilots since the [city] International Airport is a designated U.S. port-of-entry and MCAS [name] is often the base of operations for NATO aircraft exercises. The U.S. Customs Service, Border Patrol, Drug Enforcement Administration, and the [city] Sheriff's Department also conduct air operations from the facility. According to the agency's statistics, 60 percent of the total IFR operations are conducted by the military, 15 percent by commercial air carriers, and 24 percent by general aviation aircraft.

The control tower at MCAS [name] is located over two miles away from the end of one of the major military runways and one of the Harrier vertical landing/take-off pads, restricting visibility and negatively affecting depth perception. In addition, there are over 15 aircraft taxiways which intersect the runways in multiple locations and several aircraft parking areas are not readily visible from the control tower. These factors require continual coordination among the local controller, ground controller, tower coordinator, and pilots as well as with radar section controllers.

The appellants indicate that another challenge faced by the control tower is maintaining separation of aircraft with speed variations and capabilities of over 200 knots. The appellants must coordinate with the pilots and other tower controllers to ensure that faster aircraft do not overtake slower ones and must ensure that fixed-wing aircraft and helicopters (there may be as many as 65 attached to squadrons training at MCAS [name]) do not taxi past each other. As indicated above, slower general aviation aircraft are assigned different runways. Different traffic patterns and altitudes are set for civilian and military aircraft and helicopters. Controllers must sequence landings and departures to ensure the smooth and expeditious flow of traffic in MCAS Yuma's Class D airspace and must coordinate hand-offs of the aircraft with controllers in the radar section. These skills and abilities are first discussed at the GS-10 level of the standard.

Increased traffic and other complexities will require greater skill levels. Because of the layout of the runways and control tower, the appellants can experience difficulty in maintaining a visual of all activities 360 degrees around the control tower. One example is during an aircraft overhead brake maneuver. In this standard high-speed military aircraft maneuver, an aircraft will approach the runways at faster than normal speed. It will then conduct a sharp-turn brake, equivalent to a 360-degree turn and line up for landing or touch-and-go operations. Because of the layout of the runways and the tower control, the aircraft must circle behind the control tower. This results in the local controller position having to maintain visual contact with aircraft operating in a 360-degree radius around the control tower.

The airspace in the vicinity around MCAS [name] has several complicating factors. The first is the large number of special use areas over which the appellants must maintain positive control, including restricted space for the use of live ordnance. Several of these areas include altitudes of up to 80,000 feet, though aircraft mostly stay below 50,000 feet. A further complicating factor is that the special use airspaces are stratified by the nature of operations within the areas, i.e., the higher altitudes are used for air-to-air combat while the lower altitudes are used for the dropping of live air-to-surface ordnance and electronic warfare. The controllers at MCAS [name] must maintain positive control of these areas and ensure that pilots do not stray either into or out of the confines of the special use areas. They must also resequence aircraft using these areas into the main flow of en route traffic and ensure adequate separation among aircraft.

Other complicating factors are the shared border with [country] and noise abatement procedures north of the station. Noise procedures restrict flights directly over the city just north of the airport except in emergency situations. Instrument procedures and runway configurations provide for use of airspace further north and to the south and east of the field. Because of the proximity of the border and procedures in place for noise abatement over the city of [name], controllers are somewhat limited in the airspace they can use, requiring close coordination with range controllers in sequencing aircraft out of the special use areas. The appellants report that there are several “blind spots” that affect communications among the appellants and pilots.

The standard indicates that at the GS-11 level, complicating environmental and operational factors are common, e.g., the presence of satellite airports, crossing or converging runways, unfavorable terrain, restricted areas. While the traffic count for the appellants’ position does meet the lower threshold of the GS-12 level, the environmental factors do not fully meet the level typical for the GS-12 level. The two primary use runways are parallel, and the general aviation runways do cross, very near the end of the longer runways. There are satellite airports but there is limited activity and limited complexity to their operations. While there is a noise abatement restriction for the city of Yuma, it does not appear to be as restrictive as typical of the GS-12 level.

GS-11 is credited for this factor.

Decision

The appellants’ position is properly classified as Air Traffic Control Specialist (Terminal), GS-2152-11.