

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

Dallas Oversight Division
1100 Commerce Street, Room 4C22
Dallas, TX 75242-9968

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

Appellant: [appellant's name]

Agency classification: Aircraft Maintenance Manager
GM-1601-14

Organization: Directorate of Maintenance
[Group, Wing]
Air Education and Training Command
Department of the Air Force
[location]

OPM decision: GS-1601-14
title at agency discretion
(agency to decide GM designation)

OPM decision number: C-1601-14-01

/s/ Bonnie J. Brandon

Bonnie J. Brandon
Classification Appeals Officer

June 20, 2001

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:

[appellant's name and address]

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Introduction

On September 26, 2000, the Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant]. His position is currently classified as Aircraft Maintenance Manager, GM-1601-14. However, he believes the classification should be Aviation Logistics Manager, GS-346-15. The appellant's position is located in the Directorate of Maintenance, [Group, Wing], Air Education and Training Command (AETC), Department of the Air Force, [Air Force Base] (AFB), [state]. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

To help decide the appeal, an Oversight Division representative conducted telephone interviews with the appellant and his immediate supervisor. We also contacted agency personnel officials by telephone to discuss various aspects of the appellant's position. In reaching our classification decision, we have reviewed the information obtained during the interviews and all information of record furnished by the appellant and his agency, including his official position description (PD), Air Force Core Personnel Document [number]. The appellant and his immediate supervisor agree that the appellant's current PD is accurate.

General issues

The appellant makes various statements about his agency and its evaluation of his position. In adjudicating his appeal, our only concern is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing the appellant's current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Because the [Wing] does not include a Logistics Group, the appellant states that he carries out the duties and responsibilities that would be assigned to the Logistics Group Commander for the Wing. According to the appellant, the previous Logistics Group Commander was an Air Force colonel. The appellant further states that he has been given the authority and responsibility, but not the title or commensurate grade, of a military officer. We recognize that the status of a particular position can be an important consideration in carrying out duties and responsibilities in a military operation and that much attention is given to the "rank-in-the-person" concept. However, a comparison to military rank is not a valid classification consideration when classifying civilian positions under the General Schedule system. A pay grade cannot be added exclusively to raise a position to equate the "status" of the civilian and military positions. Consequently, we based our classification decision for the appellant's position solely on an evaluation of the position's official duties and responsibilities in comparison with published OPM classification standards.

Position information

The primary purpose of the appellant's organization is to provide aircraft maintenance support to the Wing by ensuring that an adequate number of aircraft are available to meet the daily pilot training requirements of about 300 flying missions per day. According to information provided

by the agency, the fleet of 254 aircraft is the largest in the Air Force and has the largest number of programmed flying hours in the AETC.

The appellant serves as the Director of Maintenance for the [Group]. He has responsibility for some of the functions that typically could be assigned to a Logistics Group Commander for the [Wing]. The appellant plans, prioritizes, supervises, directs, controls, and coordinates all maintenance activities related to T-37B, T-38A, and T-1A weapons systems and diverse pieces of aerospace ground equipment. He directs the operation and administration of the maintenance organization through eight subordinate flights that are responsible for flight line maintenance (organizational), back shop support (intermediate), and quality assurance evaluation of contract support associated with aircraft and support equipment maintenance. In carrying out these duties, the appellant performs the following activities:

- plans the use of workers, equipment, facilities, materials, and tools;
- determines resource requirements, materials, and the number of subordinates and the types of skills needed to accomplish long-range work schedules;
- allocates resources and distributes work to organizational segments or groups;
- analyzes work plans developed by subordinate supervisors and closely monitors the status of their work in relation to overall schedule requirements; and
- provides information and advice to higher level management officials on the feasibility of work assignments, budget estimates, and workload data to assist in developing or reviewing proposed long-range schedules and work requirements.

The appellant manages about \$425 million worth of equipment and an annual budget of more than \$96 million. The workforce consists of approximately 690 civilian employees and more than 250 contract employees. The civilian employees occupy a variety of General Schedule positions and Federal Wage System (FWS) jobs. In managing these resources, the appellant determines and coordinates acquisition and priority use of money, manpower, equipment, and materials. He identifies training needs of civilian employees and ensures that a training program is established to improve employee productivity, sustain mission objectives, and enhance overall mission accomplishment. He also monitors other programs for the maintenance organization, including hazardous material and waste, energy, security, and safety.

As a member of various boards, councils, and committees at [the appellant's AFB], the appellant participates in setting goals, priorities, strategic plans, and policies to ensure the Wing's mission is accomplished in the most cost effective and efficient manner. He represents the Wing at semiannual conferences for Chiefs of Maintenance. Locally, the appellant makes decisions on technical, administrative, and management problems submitted by his subordinate supervisors.

The appellant is responsible for monitoring three aircraft maintenance contracts: Engine Regional Repair Center (ERRC), Transient Alert, and Contract Owned and Maintained Base Supply.

- The ERRC is an AETC facility that performs depot level overhaul of J69 and J85 jet engines used by the Air Force to support the missions of four pilot training wings [AFB's]. This facility also provides engine and component repair support to [an AFB] as needed and

provides support to the Naval Air Station at [location], for joint service aircrew training. All Air Force pilots must begin their training at one of the five Air Force training bases. Services provided by ERRC affect approximately 1,300 instructor pilots, 2,000 student pilots (including foreign nationals), and 2,400 maintenance personnel.

- The Transient Alert contract supports [the appellant's AFB] airfield operations and provides basic ground handling, servicing, and inspection services to military and other Federal Government aircraft traveling to and from [the appellant's AFB].
- The Contract Owned and Maintained Base Supply contract covers maintenance for the T-1A weapons system.

In addition to supporting local aircraft maintenance operations, the component repair and fabrication shops provide some support to the U.S. Border Patrol's aircraft overhaul program. The appellant's organization also provides off-station maintenance support to airfields in [five locations].

The appellant is also responsible for the Precision Measurement Equipment Laboratory (PMEL) and the Non-Destructive Inspection Laboratory (NDI). The PMEL provides calibration services for a variety of electronic test equipment used by the U.S. Border Patrol, the U.S. Customs Service, the National Weather Service, the National Park Service, the International Boundary and Water Commission, and the [appellant's AFB] Medical Group. Both [the appellant's AFB] and the Border Patrol use the NDI for engine oil analysis.

Series determination

In determining the appropriate series for a position, we must consider the primary work of the position, the highest level of work performed, and the paramount qualifications required for the work. Other factors that influence the determination of the series include the function of the organization, line of promotion for the position, and occupational areas that would provide well-qualified applicants for the position.

The appellant believes his position should be in the GS-346 series, in part, because he performs work that typically may be assigned to a Logistics Group Commander and there is no Logistics Group Commander at [the appellant's] AFB. He also cites Air Force instructions and policy directives that organizationally include "aircraft maintenance and aviation logistics" as part of the Logistics Group. The appellant says that the qualifications required and the typical career path for his position (Director of Maintenance) are grounded in progressive aircraft maintenance aviation and logistics activities. Further, the appellant states that persons with extensive experience in aircraft maintenance and aviation logistics management are a recruiting source for positions such as his.

In an advisory dated October 28, 1999, and a memorandum dated June 22, 2000, the Director of Personnel for AETC concluded that the appellant's position is appropriately assigned to the GS-1601 series. The June memorandum states that the local activity's proposal to reclassify the appellant's position to the GS-346 series is not the answer to addressing recruitment or retention

problems. The Director of Personnel suggests that an obstacle to identifying well-qualified candidates for director and deputy director of maintenance positions is the lack of specialized aircraft maintenance skill codes in Air Force's personnel staffing system. He also indicates that using different approaches for recruiting and assessing qualifications of potential candidates is a more appropriate strategy than changing the occupational series.

The GS-1601 series covers positions involving (1) work included in two or more of the series in the GS-1600 Equipment, Facilities, and Services Group **or** (2) other equipment, facilities, or services work for which no other series has been established. The GS-1600 Group includes positions involving cemetery administration, facility management, printing management, laundry and dry cleaning plant management, and equipment specialist duties. Positions in this group require technical or managerial knowledge and ability and a practical knowledge of trades, craft, or manual-labor operations. Many positions in the GS-1601 series require both trade and managerial knowledge, skills, and abilities. The classification standard for the GS-1601 series states that all positions covered by the standard consist of a complex network of managerial duties and responsibilities. The standard also assumes that all positions have the **full** range of managerial responsibilities.

Employees in managerial positions in the GS-1601 series (1) direct the work of production or maintenance organizations; (2) are held accountable for the success of specific line or staff programs, projects, functions, or activities; and (3) monitor the progress of the organization toward goals and periodically evaluate and make appropriate adjustments. In addition, managerial employees typically perform the following duties:

- determine goals and develop plans for a production or maintenance organization independently of or jointly with higher management;
- contribute significantly to the determination of resource needs and allocation of resources and are held accountable for their effective use;
- make or recommend organizational changes which have considerable impact, such as those involving basic structure, operating cost, and key positions;
- consider a broad spectrum of factors when making decisions (or recommendations to higher-level management) including such matters as public relations, labor-management relations, and the effect on other organizations;
- coordinate program efforts with other internal activities or with the activities of other agencies;
- assess the impact of the organization's programs on other parts of the agency including those in other production or maintenance organizations in other Government entities and in the private sector;
- set policy for the organization, such as determine program emphases and operating guidelines, and understand and communicate agency policies and priorities throughout the organization managed;
- deal with general personnel management policy matters affecting the entire organization, personnel actions affecting key employees, or other manpower actions having significant impacts; and
- delegate authority to subordinate supervisors and hold them responsible for the performance of their units.

Maintenance managers typically manage a large workforce (for example, between 100 and 1,500 employees) in a variety of trades, crafts, and laboring occupations. They have considerable responsibilities in areas such as labor relations, position management, budget, personnel management, equal opportunity programs, planning, scheduling, and work coordination. Further, maintenance managers typically direct the work of their organization through two or more subordinate levels of supervision.

The GS-346 series covers positions concerned with directing, developing, or performing logistics management operations that involve planning, coordinating, or evaluating the logistical actions necessary to support a specific mission, weapons systems, or other designated program. The work involves (1) identifying the specific requirements for money, manpower, materiel, facilities, and services needed to support the program and (2) correlating those requirements with program plans to assure that the needed support is provided at the right time and place. Logistics work requires (1) knowledge of agency program planning, funding, and management information systems; (2) broad knowledge of the organization and functions of activities involved in providing logistical support; and (3) ability to coordinate and evaluate the efforts of functional specialists to identify specific requirements and to develop and adjust plans and schedules for the actions needed to meet each requirement on time. Positions in this series require some degree of specialized knowledge of some or all of the logistics support activities involved. The *paramount* qualification requirement is the ability to integrate the separate functions in implementing a logistics management program.

Logistics management work involves the coordination and integration of numerous activities and functions into an overall efficient and effective support effort. Depending upon the mission or program being supported, these activities may include such specializations as maintenance, supply, quality assurance, facilities and property management, production control, procurement, transportation, inventory management, property disposal, resource and fiscal management, and management of support agreements. Logistics management work also typically involves such other specialized activities as resource and fiscal management, training, automated data processing, and manpower management. Characteristic of all logistics management work, however, is the overriding requirement to coordinate the activities of the individual functional areas into a unified program that will meet total support requirements.

The primary responsibilities of logistics management specialists are to:

- identify all activities that will be involved in providing needed logistical support;
- integrate the actions required of each activity into a comprehensive logistics plan in support of or to be incorporated into overall program plans;
- monitor progress toward meeting the logistics plan and identify the cause and impact of delays or other problems;
- adjust plans and schedules for all related actions as required by delays or changes to logistics requirements; and
- evaluate plans for and provision of logistical support for feasibility, efficiency, and economy and develop alternatives when required.

Work in the GS-346 series requires the application of broad knowledge of a wide variety of logistics support activities. Such activities include the following:

- the determination of detailed requirements, within available or allocated resources, for funds, manpower, facilities, equipment, supplies, and services;
- the design and development, procurement, production, storage, distribution, maintenance, transportation, utilization, and disposal of material;
- the procurement or design and construction, operation, maintenance, and disposal of facilities;
- the acquisition and training of personnel; and
- the acquisition or furnishing of such services as communications and those required to meet personnel needs (for example, housing, commissary services, food services).

The logistics management specialist typically is concerned with most or all of these activities, but the employee is not required to be fully competent to the extent of being a specialist in each field. The work is performed through consultation with technical specialists in each function on specific requirements and capabilities, lead times, costs, and other matters affecting logistics planning. However, the logistics management specialist must understand the functional fields involved in sufficient depth to accurately understand and analyze the logistics management implications of the information obtained.

We agree with the agency's determination that the appellant's position is most appropriately assigned to the GS-1601 series. The primary purpose of the position is to manage and coordinate the aircraft maintenance and repair functions in support of the Wing's mission. The GS-346 work assigned to the appellant's position is secondary to the maintenance function that the appellant supervises. While some of the functional specialties described in the GS-346 standard are present in the appellant's position (maintenance, resource and fiscal management, manpower management), GS-1601 managerial employees also have responsibilities for maintenance (for example, aircraft maintenance and repair), resource and fiscal management (for example, the determination of resource needs and allocation of resources, including fiscal and budget considerations), and manpower management (for example, position management that includes the scheduling or reassignment of work to meet workload requirements and the determination of training or retraining needs of employees). The appellant does not provide logistics support to other programs by orchestrating separate and distinct operations as described in the GS-346 standard. The primary responsibilities of the appellant's position require more technical knowledge of the equipment and its functions, operation, and maintenance than GS-346 positions. His position requires an in-depth knowledge of the maintenance organization and a knowledge of the functions of other Wing and base activities such as civil engineering, personnel, and manpower. In summary, the primary duties of the appellant's position are clearly maintenance based, and the prerequisite skill and knowledge requirements are an appropriate fit for the GS-1601 series.

Title determination

The GS-1601 standard does not prescribe titles. Therefore, the agency may construct a title in accordance with titling instructions in the *Introduction to the Position Classification Standards*.

Standard determination

The agency used only the General Schedule Supervisory Guide (GSSG) to grade the appellant's position. We used the GSSG and the grading criteria in the GS-1601 standard to determine the grade level for the appellant's position.

Grade determination

Evaluation using the GSSG

The GSSG has six evaluation factors, each with several factor level definitions and corresponding point values. Each factor level describes the minimum characteristics needed to receive credit for the described level. If a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Positions are evaluated by crediting the points designated for the highest level met under each factor and converting the total to a grade by using the grade conversion table provided in the GSSG.

The appellant disagrees with his agency's evaluation of Factors 1, 5, and 6. We concur with the agency's evaluation of Factor 3; we disagree with the agency's evaluation of Factor 2 and Subfactor 4B of Factor 4. Our evaluation with respect to Factors 1, 2, 4, 5, and 6 follows.

Factor 1, Program scope and effect

This factor has two components, scope and effect. It assesses the general complexity, breadth, and impact of the program areas and work directed, including the organizational and geographic coverage. This factor also assesses the impact of the work both within and outside the immediate organization. To credit a particular factor level, the criteria for both components must be fully met. The agency evaluated this factor at Level 1-3. The appellant believes Level 1-4 is more appropriate.

Scope

This component addresses the general complexity and breadth of (1) the program (or program segment) directed and (2) the work directed, the products produced, or the services delivered. The geographic and organizational coverage of the program (or program segment) within the agency structure is addressed under this component.

At Level 1-3, the supervisor directs a program segment that performs technical, administrative, protective, investigative, or professional work, typically covering a major metropolitan area, a State, a small region of several States, or, when most of the area's taxpayers or businesses are

covered, a small city. Providing complex administrative, technical, or professional services directly affecting a large or complex multimission military installation also falls at this level. The appellant's position meets the intent of Level 1-3 in that it provides a variety of technical support services to a number of organizations within the Air Force and to six other government agencies with diverse missions. Without the jet engines that are overhauled and repaired at the ERRC, sufficient aircraft would not be available to support the student pilot training mission at four pilot training Wings. The appellant's work directly supports AETC operations.

The appellant's position does not meet Level 1-4 where positions direct a segment of a professional, highly technical, or complex administrative program which involves the development of major aspects of key agency scientific, medical, legal, administrative, regulatory, policy development or comparable, highly technical programs or the program includes major, highly technical operations at the Federal Government's largest, most complex industrial installations. The appellant is not charged with the responsibility for developing *agency* (that is, Air Force) policy or regulations. Although he supervises a program segment that affects pilot training operations at other locations, the [appellant's facility] cannot be considered as among the largest, most complex Government installations as envisioned at Level 1-4. The scope of work directed by the appellant in support of the Wing's mission is not equivalent to directing the same kind of work throughout AETC or for Air Force headquarters-wide operations.

Effect

This component addresses the impact of the work, the products, and programs described under *Scope* on the mission and program of the customer(s), the activity, other activities in or outside of the Federal Government, the agency, other agencies, the general public, or other entities.

At Level 1-3, activities, functions, or services accomplished directly and significantly affect a wide range of agency activities, the work of other agencies, the operations of outside interests, or the general public. At the field activity level (involving large, complex, multimission organizations and/or very large serviced populations), the work directly involves or substantially affects the provision of essential support operations to numerous, varied, and complex technical, professional, and administrative functions. The appellant's position meets Level 1-3 in that the aircraft maintenance support is essential to ensuring that pilot training is accomplished. The work of the appellant's organization directly affects the operations of AETC.

Level 1-4 is not met. At this level, the work directed has an impact on an agency's headquarters operations, several bureauwide programs, or most of an agency's field establishment; facilitates the agency's accomplishment of its primary mission or programs of national significance; has an impact on large segments of the nation's population or segments of one or a few large industries; or receives frequent or continuing congressional or media attention. In contrast, the appellant's maintenance operation is only one portion of the total AETC mission. The appellant's position does not have the agency-wide (that is, Air Force-wide) impact, the national impact, or level of congressional or media attention described at Level 1-4.

Both scope and effect are evaluated at Level 1-3 (550 points).

Factor 2, Organizational setting

This factor considers the organizational situation of the supervisory position in relation to higher levels of management.

The local activity evaluated the appellant's position at Level 2-2, where the position is accountable to a position that is one reporting level below the first Senior Executive Service (SES) level, flag or general officer military rank, or equivalent of higher level position in the direct supervisory chain. The local activity determined that the appellant's position reports to the [Operations Group Commander] who in turn reports to the [Wing Commander]. In its advisory to the local activity on October 28, 1999, AETC stated that Level 2-3 is appropriate because the appellant is recognized and functions on the same level as the Operations Group, Support Group, and Medical Group Commanders who report to the Wing Commander, determined by AETC to be the military equivalent of an SES position.

Organizationally, the appellant's position falls under the Operations Group Commander. The appellant's position description states that the Wing Commander provides general supervision and the Operations Group Commander provides overall policy direction and rates performance. According to instructions in the GSSG, the factor level selected is the level associated with the position responsible for performance appraisal. Since the Operations Group Commander is responsible for the appellant's performance appraisal, the appellant's position is creditable to Level 2-2.

Level 2-2 (250 points) is assigned.

Factor 4, Personal contacts

This two-part factor assesses the nature and the purpose of personal contacts related to supervisory and managerial responsibilities. The same contacts that serve as the basis for the level credited under Subfactor 4A must be used to determine the correct level under Subfactor 4B.

Subfactor 4A, Nature of contacts

We agree with the agency's assignment of Level 4A-3 where contacts are with high-ranking civilian managers, supervisors, and technical staff at bureau or major organization levels of the agency. Contacts at this level also include contacts that take place in meetings and conferences and unplanned contacts for which the employee is designated as a contact point by higher management.

Level 4A-3 (75 points) is credited.

Subfactor 4B, Purpose of contacts

The purpose of contacts at Level 4B-3 is to justify, defend, or negotiate in representing the program directed, in obtaining or committing resources, and in gaining compliance with

regulations. Contacts at this level usually involve active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance to the program managed.

The agency credited Level 4B-4. The purpose of contacts at that level is to persuade persons to take actions related to advancing the fundamental goals and objectives of the program directed. Contacts at Level 4B-4 may involve the commitment or distribution of major resources when *intense* opposition is encountered because of significant organizational or philosophical conflict, competing objectives, major resource limitations, or comparable issues. At that level, the persons contacted are sufficiently fearful, skeptical, or uncooperative that highly developed communication, negotiation, conflict resolution, leadership, and similar skills must be used to obtain the desired results.

While the appellant's contacts may require a degree of influence and persuasion, persons contacted within the agency ([the appellant's] AFB, AETC, and Air Force) typically share a common or related mission and philosophy and are more cooperative than is described at Level 4B-4 in resolving problems and coordinating work. Likewise, persons such as contractor representatives or personnel in other Federal agencies are generally seeking a mutually acceptable resolution to problems. Consequently, the intent of Level 4B-4 is not met.

Level 4B-3 (100 points), is credited.

Factor 5, Difficulty of typical work directed

This factor measures the difficulty and complexity of the basic work most typical of the organization(s) directed, as well as other line, staff, or contracted work for which the supervisor has technical or oversight responsibility, either directly or through subordinate supervisors, team leaders, or others. The agency credited Level 5-5. The appellant believes that Level 5-7 is more appropriate.

Under the GSSG, the base level of work supervised by second-level and higher-level supervisors may be determined in two different ways. First, the method used for first-level supervisors can be used to determine the correct base level of work for second- and higher-level supervisors, as well. Using this method, the base level of the typical work directed is the highest grade that (1) best characterizes the nature of the basic (mission-oriented) nonsupervisory work performed or overseen by the organization directed and (2) constitutes 25 percent or more of the *workload* (not positions or employees) of the organization. The workload of General Schedule (GS) subordinates, Federal Wage System (FWS) employees, and non-Federal workers, such as contractor employees, are included in determining the typical work that constitutes at least 25 percent. Second, in cases where a heavy supervisory or managerial workload related to work above the base level for second- and higher-level supervisors is present, an alternative method may be used to determine the base level for second- and higher-level supervisors. The highest grade of nonsupervisory work directed that requires at least 50 percent of the duty time of the supervisory position under evaluation may be used as the base level, provided that it results in sound grade-level alignment with other supervisory positions in the organization and agency.

AETC disagreed with the local activity's finding that GS-11 is the base level of work directed by the appellant. AETC determined that the highest nonsupervisory work is WG-10 Aircraft Mechanic work. By comparing the WG-10 work to the grading criteria in the classification standard for the GS-802 Engineering Technician Series, AETC equated the FWS work to the GS-9 level. The appellant believes the base level should be at the GS-12 or GS-13 level.

The GSSG defines levels under Factor 5 in terms of GS grades. It does not, however, provide for equating FWS work to GS grades. OPM classification guidance points out that grades under the FWS and GS pay systems are not linked in any way that permits conversion from an FWS grade to a GS grade or vice versa. Therefore, the level credited under this factor must be based on separate consideration of the FWS and GS work directed.

The Directorate of Maintenance has approximately 90 GS and 600 FWS employees who accomplish the work that is not done on a contract basis. The appellant directs the organization through 9 second-line supervisors, 37 first-line supervisors and 33 work leaders. The predominant work is represented by the Aircraft Mechanic Series, 8852, and the Aircraft Attending Series, 8862. The contract personnel associated with work for the ERRC and the Contract Owned and Managed Base Supply and the Transient Alert contracts perform work very similar to the work of the GS and FWS employees.

We agree with the agency that the WG-10 level is the highest grade of nonsupervisory work that constitutes 25 percent or more of the workload for the appellant's organization. We did not use the alternative method of base level determination for second- or higher-level supervisors because there is no indication that the appellant supervises work at a higher grade level than WG-10 that consumes *at least* 50 percent of his duty time.

Although it is not possible to make a direct correlation between FWS and GS positions, the level of work performed by the WG-10 employees in the appellant's organization does not exceed the level of work performed by GS-9 employees in professional, technical, and administrative occupations. For example, the complexity of work assignments performed by a WG-10 Aircraft Mechanic does not exceed the level of complexity of GS-856-9 Electronics Technician work or of GS-802-9 Engineering Technician work. The applicable job grading standard for the 8852 series and the position classification standards for the 856 and 802 series illustrate that the complexity of work of a typical WG-10 job does not exceed that of a typical GS-9 position.

Grade 10 Aircraft Mechanics install, troubleshoot, tests, maintain and repair a variety of major interrelated or integrated aircraft systems. They independently determine the nature of trouble, extent of repair required, and how to complete the work assignment. They may also be authorized to release aircraft to service. Their work is spot checked upon completion.

GS-9 Electronics Technicians install, troubleshoot, test, and maintain complete systems of considerable complexity such as air navigation control systems. They work independently and are technically responsible for the quality and accuracy of their work which is spot checked upon completion. They determine if a system is to be removed from or returned to service.

They must ensure their decision is correct to avoid loss of life and property damage to aircraft.

GS-9 Engineering Technicians plan and conduct a block of work which is a complete conventional project of relatively limited scope or a portion of a larger and more diverse project. They apply established methods, procedures, and techniques and exercise independent responsibility. Their work is reviewed for adequacy and for conformance with established policies and precedents.

While the Aircraft Mechanic, WG-8852-10, the Electronics Technician, GS-856-9, and the Engineering Technician, GS-802-9, carry out their assignments within a high degree of technical independence, the overriding consideration is the level of complexity of the work performed. The comparison of the kind of assignments performed by employees in the three occupations demonstrates that WG-10 work is not inherently more complex than GS-9 work. Without attempting to equate FWS grades to GS grades, we conclude that the representative trades and crafts work performed within the appellant's organization does not provide a basis for crediting a higher level than Level 5-5.

Level 5-5 (650 points) is credited.

Factor 6, Other conditions

This factor measures the extent to which various conditions contribute to the difficulty and complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is responsible (whether performed by Federal employees, assigned military, contractors, volunteers, or others) may be considered if they increase the difficulty of carrying out assigned supervisory or managerial duties and responsibilities.

To evaluate Factor 6, two steps are used. First, the highest level that a position fully meets is initially credited. Then, if the level selected is either 6-1, 6-2, or 6-3, the Special Situations listed after the factor level definitions are considered. If a position meets three or more of the situations, then a single level is to be added to the level selected in Step 1. If the level selected under Step 1 is either 6-4, 6-5, or 6-6, the Special Situations may not be considered in determining whether a higher factor level is creditable.

The lettered paragraphs under Factor 6 are structured to cover positions that function as either first-, second-, or higher-level supervisors. The appellant's position functions as a third-level supervisor. The appellant believes that Level 6-6 is appropriate for his position. The local activity had evaluated this factor at Level 6-5c, using the rationale that each of the appellant's nine subordinate (second-line) supervisors directs substantial workloads comparable to the GS-11 grade level. In its advisory of October 1999, AETC credited Level 6-4b, finding that each of the subordinate supervisors and the contractors directs substantial workloads comparable to the GS-9 or GS-10 grade level.

The appellant's position meets Level 6-4b. Each of the appellant's subordinate supervisors directs substantial workloads that do not exceed the level of work performed by GS-9 employees. The subordinate supervisors must also coordinate and integrate a variety of complex technical work within the organization and with contractor personnel. Because the level of work credited under Factor 5 does not exceed the GS-9 grade level, the appellant's position is precluded from evaluation at either Level 6-5 or Level 6-6. Since we have evaluated the appellant's position at Level 6-4, his position cannot be given additional credit for special situations.

Level 6-4b (1,120 points) is credited.

Summary

Using the GSSG, we have evaluated the appellant's position as follows.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Program scope and effect	1-3	550
2. Organizational setting	2-2	250
3. Supervisory and managerial authority exercised	3-4	900
4. Personal contacts		
4A. Nature of contacts	4A-3	75
4B. Purpose of contacts	4B-3	100
5. Difficulty of typical work directed	5-5	650
6. Other condition	6-4	1,120
	Total	3,645

A total of 3,645 points falls within the GS-14 range of 3,605 to 4,050 on the conversion chart of the GSSG.

Evaluation using the GS-1601 standard

The GS-1601 standard uses four factors for measuring grade level: planning and coordinating responsibilities, product complexity, complexity and rigidity of requirements, and scope of operations. For each of these factors, the standard defines three levels and assigns point values.

Factor 1, Planning and coordinating responsibilities

This factor measures the level of planning and coordination required of the manager, taking into consideration the variety of operations, changing workloads, and resources requirements.

The appellant's position exceeds Level C where an organization's work typically requires little coordination among work groups, within or outside of the organization. At Level C, workloads and manpower requirements are steady and training is normally required only to bring employees to the full performance level of their trade.

Level B describes projects that typically include several operations and require careful planning and coordination. Many of these projects require substantial interaction between work groups in various trades or organizational units. Workload and manpower requirements often change significantly from year to year. Managers must train and retrain employees, but there is typically an infrequent need for sudden development of one-of-a-kind courses to accommodate new procedures, equipment, or changes in makeup of workload. Much of the work is subject to frequently changing work situations. To handle such work situations, the manager must be exceptionally adaptable, have special skills in planning, and be able to act quickly and withstand considerable and continuing pressure. Operations at Level B include complex assignments associated with major modification or repair of aircraft when the work is normally performed at the beginning or end of the repair with little other involvement throughout the process.

At Level A, the work requires constant and highly complex coordination between work groups either within or outside the organization. The work includes a substantial number of complex, one-of-a-kind projects, each including several operations and requiring considerable planning and coordination. These projects require substantial interaction among work groups in various trades with planning and coordination required to bring the resources together in specific sequence and times. Workload is subject to frequent, substantial, and unexpected changes within a few months and the mission requires frequent retraining of workers because of new techniques, new equipment, significant changes in makeup of workload, or requirements for recertification of workers. Examples of assignments at this level include major modification and repair of aircraft requiring significant involvement of the manager throughout the process.

The appellant has subordinate supervisors who have the primary responsibility for the maintenance and repair functions performed by the units under his direction. The appellant is responsible for coordinating those operations with the planning, support, and equipment management aspects of his position. He must also coordinate with the user organizations regarding priorities when scheduling maintenance activities. The appellant's organization contains a variety of trade skills, and considerable interaction is required to provide the service. While the type of skills required remains fairly constant, changes in program and/or equipment may result in realignment of skills and additional training. The appellant's position is most comparable to Level B. The appellant's organization does not involve frequent or unexpected changes in workload and does not require the level of retraining indicated at Level A.

Level B (40 points) is credited.

Factor 2, Product complexity

This factor reflects the general level of technical complexity inherent in the work of the manager. The complexity of service, the nature and diversity of problems to be faced, and the technological state-of-the-art are considered in determining the level that is most applicable to the manager's position.

The appellant's position exceeds Level C where most projects are small or consist of routine, ongoing exercises. At this level, methods are standardized and readily understood, and

specifications are usually clear and may be simple enough to use oral rather than written instructions. There is little need for development of new methods and procedures.

Services typical of Level B are complicated by the size and complexity of facilities required to provide the service or by the variety and critical sequence of operations required to provide the service. Timeliness and thorough completion of work is often critical for safety reasons. Direct precedent is usually available for resolution of problems. At this level, there is limited need for developing new methods and procedures for work accomplishment.

At Level A, products and services are highly complex and must meet extremely high quality standards. New problems are continually arising for which there is no precedent, and great effort is expended in devising new procedures. Inspections of the final product are very rigorous, often requiring sophisticated testing methods and equipment.

The primary purpose of the appellant's organization is to provide maintenance and repair for aircraft and support equipment. The variety and size of the maintenance support operations are most comparable to Level B. The requirements for maintenance and repair are relatively standard, and most equipment does not meet the intent of Level A in regard to unprecedented problems and development of new procedures or methods.

Level B is assigned (40 points).

Factor 3, Complexity and rigidity of requirements

This factor considers the complexity of the organization based on the types of problems presented to the manager. It also recognizes the difficulty placed on the manager by tight deadlines, restricted approaches to completing the work, and specified paperwork controls.

The appellant's position exceeds Level C where scheduling is accomplished without significant reference to other organizations, and priorities are based primarily on capabilities of the immediate organization. At this level, the manager is relatively free to determine deadlines, approaches to completing the work, and management controls to be used.

At Level B, scheduling is accomplished by agreements between customer and producer, and determination of priorities requires coordination with outside organizations. Although the customers establish requirements and deadlines to be met, the manager is relatively free to determine approaches and management controls to be used.

At Level A, the organization's customers have the authority to establish very rigid requirements concerning how and when the work will be done. Although the manager has a role in establishing time and resources required and the freedom to reshuffle resources, the manager normally does not have the authority to change completion dates. At this level, priorities are largely determined by circumstances beyond the manager's control. Scheduling is extremely difficult because of the stringent timing limitations and the need to coordinate the organization's work with other organizations.

The appellant's position is most comparable to Level B. Repair and maintenance requirements are determined within the directorate. There is consultation and coordination with user organizations regarding maintenance schedules and priorities. Scheduled projects attempt to minimize down time or delays for the user organization. The directorate staff determine the approaches and management controls to be used in completing repairs.

Level B (40 points) is credited.

Factor 4, Scope of operations

This factor measures the extent to which the size of the organization managed contributes additional grade weight to the manager's position. The factor recognizes that (other things being equal) the larger the organization, the more difficult and responsible the managerial position. The size of the organization is one of several factors in the evaluation of managerial positions. When applied with proper judgment, the size of the organization is a good indicator of the scope of operations and the management problems resulting from the scope of operations. This factor considers the numbers of employees in the workforce in three broad ranges separated by large gaps between the ranges to leave areas for judgment during the application of the comprehensive evaluation. The ranges are as follows:

Number of Employees	Level	Points
100-500	C	20
800-1,200	B	60
1,500 and above	A	100

The appellant's directorate consists of approximately 690 civilian employees. This number falls between the upper number for Level C and the lower number for Level B. The standard states that the range closest to the size of the workforce directed by the manager should be selected. We assign Level B to the appellant's position.

Tentative grade and comprehensive evaluation

The appellant's position warrants 180 total points for Factors 1 through 4. According to the table in the standard, this point total converts to a tentative grade of GS-13 (a range of 160 to 200 points).

The standard provides for a comprehensive evaluation that allows for an adjustment either upward or downward from the tentative grade based on strengthening or weakening aspects of the position. For example, such adjustment may be considered when the position falls between the ranges of Factor 4 (Scope of operations). Since the scope of operations for the appellant's position falls between two ranges, the comprehensive evaluation is appropriate. In addition to having managerial and supervisory responsibility for the civilian employees in his organization, the appellant has oversight responsibility for a number of contractor employees.

The standard also discusses several points to consider as strengthening or weakening factors. Point number 4 indicates that the number of trades supervised and the dispersion of the workforce may affect the level of planning and coordinating responsibilities of the manager. Through nine second-level supervisors, the appellant manages an FWS workforce in jobs covered by nine different job families. Aircraft maintenance employees are located in more than 50 buildings at [the appellant's] AFB. At times, civilian employees must be sent to other locations in the country to expedite repairs for broken or stranded aircraft. When work schedules need to be adjusted to meet program requirements, the appellant and his subordinate supervisors must consider provisions of the collective bargaining agreement for employees who are union members.

The number of trades supervised and the physical dispersion of the workforce sufficiently adds to the appellant's planning and coordination responsibilities to warrant an upward adjustment in the tentative grade. Overall, the appellant's position is graded at the GS-14 level by application of the GS-1601 standard.

Decision

The appealed position is properly classified as GS-1601-14, with the title at the agency's discretion.