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:	Air Traffic Control Specialist (Terminal) GS-2152-11
Organization:	Air Traffic Control Branch Airfield Operations Division Operations Department Marine Corps Air Station Department of the Navy [geographic location]
OPM decision:	Air Traffic Control Specialist (Terminal) GS-2152-11
OPM decision number:	C-2152-11-02

/s/ Bonnie J. Brandon

Bonnie J. Brandon
Classification Appeals Officer

February 14, 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:

[appellant's name and address]

Agency:

Director
Marine Corps Civilian Human Resources Office, Southwest
Headquarters United States Marine Corps
Department of the Navy
Box 555026
Camp Pendleton, CA 92055-5026

Director, Civilian Human Resources Office
Headquarters United States Marine Corps
2 Navy Annex
Code HRHB
Room 1213
Washington, DC 20380-1775

Office of the Deputy Assistant Secretary of the Navy (Civilian Personnel and Equal Employment Opportunity)
Nebraska Avenue Complex
321 Somers Court, NW., Suite 40101
Washington, DC 20393-5451

Chief, Classification Branch
Field Advisory Services Division
Defense Civilian Personnel Management Service
1400 Key Boulevard, Suite B-200
Arlington, VA 22209-5144

Introduction

The Dallas Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [the appellant] on June 27, 2000. [The appellant] is an Air Traffic Control Specialist (Terminal), GS-2152-11, assigned to the Air Traffic Control Branch, Airfield Operations Division, Operations Department, Marine Corps Air Station (MCAS), Department of the Navy, [geographic location]. [The appellant] believes his position should be classified as Air Traffic Control Specialist (Terminal), GS-2152-12. He previously filed an appeal with the Department of Defense Civilian Personnel Management Service (CPMS). That office sustained the current classification of [the appellant's] position. Because the appellant indicated to CPMS that higher grade positions at other locations were so similar to his that they should be classified the same, CPMS required the Department of the Navy to conduct a consistency review of positions at those locations. We have accepted and decided the appeal under section 5112 of title 5, United States Code.

OPM's classification appeals process is an independent, third-party review that includes a determination as to the duties and responsibilities assigned by management and performed by the appellant. This process constitutes the proper application of OPM's classification standards to those duties and responsibilities. Therefore, we have evaluated the appellant's position by application of those standards. We did not compare his position to any other positions to determine the proper classification of the appealed position. In reaching our classification decision, we carefully reviewed all information provided by the appellant and his agency, including the official position description [number]. The appellant and his supervisor agree that the official position description is accurate except for the specified work schedule. We also considered information obtained during telephone interviews with the appellant and his supervisor.

Position information

The [appellant's] MCAS a joint-use military and civilian facility and has delegated approach control authority from the Federal Aviation Administration (FAA) for [the appellant's] MCAS and [a specific] International Airport. The FAA has also delegated [the appellant's] MCAS en route traffic control for sectors previously controlled by [two FAA] Air Route Traffic Control Centers. The FAA has certified the facility for initial and advanced training of air traffic control personnel.

[The appellant's] MCAS primary mission is to support aerial weapons training for the Atlantic and Pacific Fleet Marine Forces and Navy. [The] MCAS is home to a number of units including [weapons and fighter training squadrons].

The appellant's position is located in the tower cab (control tower) of a radar approach control terminal. The appellant sequences and applies separation between aircraft under the control tower's responsibility, including aircraft on the arrival and departure runways and within the arrival and departure air corridors and the airport's local traffic pattern. The airspace under the tower's control extends upward from the surface to 2,500 feet above ground level within a 5.2 mile radius of [the appellant's] MCAS. The appellant serves as the "watch supervisor"

overseeing technical operations in the control tower. He also provides instruction to trainees in the classroom and during actual operations. During the adjudication of this appeal, the appellant was assigned to the control tower and did not rotate between the tower cab and the radar room operations. The position description and other material of record provide more information about the appellant's duties and responsibilities.

Series, title, and standard determination

The appellant does not contest his agency's assignment of the position to the GS-2152 series. We agree that the position is properly assigned to the GS-2152 series.

Air traffic control work is divided along three major functional lines: preflight briefing and assistance and advisory services to pilots during flight; control and separation of en route air traffic; and control and separation of air traffic at airports. The appellant's position is concerned with issuing air traffic control instructions and providing flight assistance to aircraft flying within a designated area around an airport. The GS-2152 classification standard specifies the title of *Air Traffic Control Specialist (Terminal)* for such positions.

Although the appellant serves as the watch supervisor providing technical oversight of the control tower, he does not exercise the level of supervision (for example, assign and review work, recommend performance standards and ratings, approve leave, interview candidates, counsel employees) necessary to evaluate the work by reference to the General Schedule Supervisory Guide. Therefore, the appellant's position is properly titled *Air Traffic Control Specialist (Terminal).* The grading criteria in Part II of the GS-2152 standard are used to evaluate the duties required to control air traffic in terminals.

Grade determination

Part II of the GS-2152 standard is used to evaluate positions responsible for issuing air traffic control instructions and providing flight assistance to aircraft flying within a designated area around airports. The duties, responsibilities, and qualifications required to control air traffic in terminals vary according to the type of aircraft operation (that is, visual or instrument flight rules) and whether radar is used. Air traffic control terminals are differentiated into four major categories on the basis of the primary type of control services provided. These categories are nonapproach control terminal, nonradar approach control terminal, limited radar approach terminal, and radar approach control terminal.

In contrast with other categories of terminals, radar approach control terminals are divided into two functional units, the radar or the instrument flight rules room and the tower cab. Generally, both of those two units are located within the same terminal facility, with controllers alternately performing radar control and tower cab duties. In some instances, however, the radar room and the tower cab are separate facilities, and controllers do not rotate between the two units. When positions such as the appellant's do not rotate between the tower and the radar room, the standard cautions that those positions must be evaluated with due consideration of the grade level relationship to the highest level of control work in the terminal.

Two classification factors are included to differentiate between work at various grade levels. These are (1) knowledge, skills, and abilities required of the controllers and (2) complexity of the control environment. The first 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 second factor addresses the demands placed on the controller by the density and congestion of aircraft. The grade level descriptions in the GS-2152 standard, particularly at the GS-10 level and above, reflect that density affects the first factor as well as the second factor.

The GS-2152 standard provides guidance for measuring traffic density. For radar approach terminals such as [the appellant's] MCAS, traffic density is based on the facility's total instrument operations count. The standard expresses traffic density in terms of the average hourly operations handled during the day and evening shifts for the terminal's 183 busiest days of the year. Both the local agency classifier and the Defense CPMS appeal decision used an average of 19 instrument operations per hour in evaluating the appellant's position. Because of the combined nature of the facility, they included en route traffic in computing the average count. As another indicator of traffic density directly affecting the [appellant's] control tower, both the local agency classifier and CPMS used the average instrument hourly workload of 8.1. The average number of 19 instrument operations per hour falls within the range for the GS-11 level.

At the time of our fact-finding, the average number of instrument operations per hour for [the appellant's] MCAS (computed for the busiest 183 days during the previous year) was 20.1. According to information provided by the appellant, the average number of operations per hour fluctuated between 19.9 and 20.2 for each 12-month period beginning September 1, 1998, and ending February 28, 2000. Agency officials do not expect this rate to decrease in the immediate future. In terms of just numbers, the appellant's position *minimally* meets the GS-12 level where the terminals typically handle an average of 20 to 59 instrument operations per hour during the day and evening shift period. However, the average operations per hour must be considered in context with other factors that affect the level of difficulty and responsibility of the appellant's position.

Knowledge, skills, and abilities required

In addition to the knowledge indicated for other categories of terminals, controllers in terminal facilities providing 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, and its various displays, the adjustment of the equipment, and the ability to detect malfunctions and interference.

GS-11 is the first level of independent performance of all control functions in radar terminals. A detailed knowledge of nonradar air traffic control typical of GS-11 and lower levels is required. At the GS-11 level, positions in terminals also require 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 the GS-12 level, 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 density of traffic, the GS-12 controller is faced *regularly* with peaks of heavy traffic. The difficulties imposed by such factors as the need to possess and apply knowledge of numerous procedures and airport configurations, procedures for satellite airports, noise abatement procedures, and complex runway problems are *substantially* intensified by the heavy densities of traffic characteristic of GS-12 radar control.

The appellant has a detailed knowledge of nonradar air traffic control procedures. He applies this knowledge on a daily basis in controlling aircraft operating under the jurisdiction of the tower. He also has a thorough knowledge of the functions and interference characteristics of radar systems, 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. The control tower is equipped with an active radar display that is used to monitor approaching and departing aircraft. The appellant must be able to align the radar system, assure it is functioning properly, and troubleshoot any suspected interference or malfunction.

The appellant also provides operational training to student air traffic controllers and occasionally provides classroom instruction. Students are normally paired with a fully qualified controller for a particular position and rotate through all positions. The appellant must monitor the actions of these students continually and pay close attention when they are paired with a less experienced qualified controller. Student controllers are assigned as a regular part of the tower operations.

The knowledge, skills, and abilities required for the appellant's position fully meet the GS-11 level. Air traffic specialist knowledge, skills, and abilities are the paramount knowledge and skills needed to perform the training work. There is no provision to add a grade level to positions that instruct lower graded trainees above the level needed to actually perform the work.

The appellant's position does not fully meet the GS-12 level. Although the traffic density of 20 operations for the [appellant's] MCAS minimally meets the GS-12 level, the difference between the GS-11 and GS-12 levels is more than just numbers. At the GS-12 level, 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. During the recurring heavy density periods typical of the GS-12 level, the controller coordinates control actions with other controllers *and* issues instructions to pilots almost simultaneously. Terminals of this type often provide radar service to a number of satellite airports. Unlike positions that are characteristic of the GS-12 level, the appellant's position does not involve the congested air space, the peaks of heavy traffic, and other complex airport configurations that require the higher level skills, abilities, and judgment described at the GS-12 level.

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 with which controllers must deal in assuring the safe, orderly, and expeditious movement of aircraft. Included among these factors are the varying mix in speed and performance characteristics of aircraft using the airport or transiting airspace under the control of the terminal; 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; the airport configuration in terms of runway and taxiway layout, lengths, and capacities; and provision of control services for satellite or secondary airports.

In radar terminals, the traffic demands at the GS-11 level are such that individual radar positions may handle more than one control function (for example, both arrivals and departures) or assume responsibility for a relatively large segment of the terminal's assigned airspace. Radar terminals at the GS-11 level typically have fewer and less complex configurations of airspace than terminal control situations at higher grade levels. As a result, coordination for the use of airspace is more readily achieved at the GS-11 level. Complicating environmental and operational factors such as the presence of satellite airports, crossing or converging runways, tower en route operations, unfavorable terrain, and restricted areas are common at this level. Instrument operations for radar approach control terminals at the GS-11 level are characterized as light to medium densities of traffic. Operations regularly range up to 19 per hour (average) during the day and evening shifts.

More complex divisions of the control work and the assigned airspace are required at the GS-12 level than in the GS-11 work situation. Thus, more intricate procedures must be developed to ensure that the necessary coordination is effected among controllers. 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. Radar approach control terminals at this level typically handle from 20 to 59 instrument operations per hour (average) during the day and evening shift period.

The control tower at [the appellant's] MCAS is normally manned by five air traffic controllers with the work divided into the following positions: flight data, ground control, tower coordinator, local controller, and tower watch supervisor. Intricate procedures are employed to ensure that the necessary coordination is effected among controllers. When the appellant serves as watch supervisor, he monitors the operations of all of the tower positions and assists or takes

control of these positions when necessary. The watch supervisor is ultimately responsible for all control tower actions and services.

[The appellant's] MCAS provides all air traffic control, crash crew services, security, and maintenance of the runways and taxiways for both the military station and [a specific] International Airport. Radar and control tower en route services are provided to aircraft transiting the area. Pilot experience for both military and civilian aircraft ranges from the inexperienced, including student pilots, to the highly proficient. Since [the] International Airport is a designated port-of-entry to the United States, foreign-national pilots frequently arrive and depart from the terminal facility.

[The appellant's] MCAS includes four intersecting runways of varying runway lengths, widths, and load bearing capabilities; multiple taxiways; and high-density parking ramps. Because there are no high-speed turnoff taxiways, greater runway occupancy time is required which then affects overall traffic flow. The facility also includes a Combat Aircraft Loading Area for live ordnance, a "jammed guns" safety parking area, a high power engine run-up area, and a Tactical Airfield Fuel Dispensing System. This refueling system, located alongside one of the more congested taxiways, is used by helicopters and the AV-8B Harrier vertical/short takeoff and landing (V/STOL) aircraft. Additional congestion is created in this area since most fixed-wing aircraft and helicopters may not taxi past each other.

A wide variety of aircraft with diverse speed and performance characteristics operate at the terminal. Civilian aircraft that use the facility include the full range of general aviation equipment such as light aircraft, heavy wide-body passenger and cargo jets, business jets, agricultural aircraft, air ambulances, major air carriers, air cargo carriers, air taxies, and helicopters. The U.S. Border Patrol, U.S. Drug Enforcement Administration, U.S. Customs Service, and Yuma Sheriff's Department conduct air operations from [the] International Airport. A major test facility for heavy wide-body jets is also located at the airport. Typical military aircraft at the facility include high performance fighters, cargo and passenger transports, V/STOL fighter aircraft, and helicopters. Approximately 40 helicopters and 50 Harrier V/STOL aircraft are permanently stationed at the facility. The Harrier V/STOL fighters conduct low level work in the southwestern part of the controlled area. They also fly the opposite direction and climb through the last four miles of the final approach to [a specific] runway.

The control tower at [the appellant's] MCAS is located more than two miles from the end of one runway and one of the Harrier vertical pads. This distance restricts visibility and negatively affects depth perception. In addition, several of the aircraft parking areas are not visible from the control tower. Visibility is also affected because the runways are located on one side of the control tower and most traffic flows to the opposite side to comply with noise abatement procedures. These conditions make it difficult for the tower controllers to maintain visual awareness of activities throughout the entire 360-degree horizon.

[The appellant's] MCAS supports 80 percent of the air-to-ground aviation training for the Marine Corps. The facility provides fleet squadrons 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 as aerial bombing and gunnery ranges. Collectively, this complex is the largest tactical aviation training range utilized by the Marine Corps.

Each year, [the appellant's] MCAS hosts numerous units and aircraft from United States and NATO forces. Approximately 50 aviation units deploy to train on the 2.8 million-acre range complex. These deployments, ranging from a few days to weeks, bring 13,000 personnel and 1,000 additional aircraft to Yuma annually. A three-week exercise in Fiscal Year 2000 comprised approximately 70 helicopters and 60 jet aircraft from other bases whose pilots were unfamiliar with the local facility and its operating procedures.

[The appellant's] MCAS provides both radar and tower services to [a satellite airport] which is located approximately 2 miles southeast. Extensive parachute and skydiving training is conducted from this airport. The Army's Golden Knights Parachute Team operates out of [a nearby area] where additional sport parachute activity takes place in proximity to the [appellant's] MCAS departure corridor.

Several additional auxiliary airfields are in the vicinity of [the appellant's] MCAS. Civilian pilots practicing local traffic patterns and landings use one auxiliary field in the area. Another field is used extensively by military helicopters for practicing boat-deck landings and another for overflow of helicopter training when the primary facility is saturated. [The appellant's] MCAS does *not* use preventive control for any traffic, and extensive guidance is required for these pilots. The proximity of these airfields increases the demands on the air traffic controllers since there is little time to integrate these aircraft into the flow of existing traffic.

Extensive agricultural air operations are conducted from [the] International Airport or adjacent to the facility. Two agricultural aircraft landing strips are close by, with one only 3 miles west. Because of the climate and extensive agricultural production in the area, these operations are continuous throughout the year. Both fixed-wing aircraft and helicopters are used for these operations.

Other factors that affect operations at [the appellant's] MCAS include mountain ranges [directions of the ranges], the international border with [another country], and several restricted flight areas [name of a specific site]. Several communications "blind spots" also exist at the facility.

To accommodate some of the environmental and operational restrictions that affect [the appellant's] MCAS, controllers employ arrival, departure, and traffic pattern altitude restrictions and make traffic pattern adjustments. Aircraft are stacked in the local traffic patterns depending on the type of aircraft and maneuver or approach being made. This results in traffic patterns for all runways either flying over or under the patterns for the remaining runways. Coordination among tower controllers and between the tower and radar controllers is also required.

Although the control environment for the appellant's position exhibits some of the numerous complicating factors found at the GS-12 level, it does not fully meet that level. Even though the average operations per hour at [the appellant's] MCAS meet the threshold for the GS-12 level, the combination of factors required to meet the difficulties described at the GS-12 level is not

present in the appellant's position. For example, the natural terrain obstructions in the flight path do not present a significant impact on complexity for the appellant's position. Environmental and operational factors such as the presence of a satellite airport [name of the airport] and auxiliary fields, the four crossing runways, tower en route operations, and restricted areas (including areas where noise abatement procedures must be used) are consistent with those described at the GS-11 level.

Decision

The appellant's position is properly classified as Air Traffic Control Specialist (Terminal), GS-2152-11.