United States
Office of Personnel Management

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

In Reply Refer To: Your Reference:

OPM Decision Number: C-0391-09-02, 9/24/97
PH:OD:97-9

PERSONAL
[appellant's name]
Telecommunications Manager
U.S. Department of the Interior
National Park Service
[activity]
[city, state]

Dear [appellant]:

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

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

Position Information

Appellant:	[appellant's name]
Current Classification:	Telecommunications Manager, GS-391-9
Position Description Number:	F4320-086
Requested Classification:	Telecommunications Manager, GS-391-11
OPM Decision:	Telecommunications Manager, GS-391-9
Organizational Information:	U.S. Department of the Interior National Park Service [activity] [city, state]

Analysis and Decision

In considering your appeal, we carefully reviewed all the information submitted by you or on your behalf; information obtained during an on-site audit with you and an interview with your immediate supervisor, [supervisor's name], Law Enforcement Specialist, and his supervisor, [second-level supervisor], Chief Ranger, on June 18, 1997; information obtained during a telephone interview with [branch chief], Branch of Radio Frequency Management, Washington Office (WASO), National Park Service (NPS) on June 20, 1997; and other pertinent classification information provided by your agency at our request.

It is our decision that your position is classified properly as Telecommunications Manager, GS-391-9. Accordingly, your appeal is denied.

In your initial appeal letter of January 31, 1997, you said that your appeal was based on your disagreement with the grade level assigned to your position description (PD). You stated your agency initially only used the General Schedule Supervisory Guide (GSSG) to evaluate your PD, and failed to apply the Telecommunications Series, GS-391 position classification standard (PCS). Because of a desk audit, your position was placed in the Telecommunications Series, GS-391 which you found "very appropriate." Your agency classification appeal decision agreed with your application of the GS-391 PCS to your position for seven of the nine factors. However, you challenged the levels assigned to Factors 2 and 3, and provided your rationale regarding the levels you feel should be assigned. In your letter of March 12, 1997, responding to your agency's classification appeal administrative report of March 7, 1997, you reiterated your disagreement in their analysis of Factors 2 and 3.

Your appeal submissions have raised several procedural issues that warrant clarification. All positions subject to the Classification Law contained in title 5, U.S. Code, must be classified in conformance with published standards issued by the OPM or, if there are not directly applicable standards, consistently with related standards for similar kinds of work. The classification appeal process is a de novo review that includes an official determination as to the duties and responsibilities assigned to your position and performed by you, and constitutes the proper application of published Position Classification Standards (PCS's) to those duties and responsibilities.

We believe there is some misunderstanding concerning the basis of classifying a position. A **PD** is the official record of the major duties and responsibilities assigned to a position by a responsible management official, i.e., a person with authority to assign work to a position. A **position** is the combined duties and responsibilities that

make up the work performed by an employee. Title 5, U.S. Code, section 5106 prescribes the use of these duties and responsibilities, and the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD. The duties classified must be assigned to the position and performed by its occupant(s).

Both you and your supervisor certified the accuracy of your PD. Our factfinding revealed that your PD of record contains your major duties and responsibilities performed and is hereby incorporated by reference into this decision.

You supervise and direct the planning and operation of the Park's Communi-cation Center (Center), which provides dispatching services for incidents involving human life, health, and safety of park employees and visitors on a day-to-day (24 hour) operation. The Center also provides radio and telephone support for all divisions in the Park, and it provides computerized National Crime Information Center (NCIC) information to Steamtown National Historic Park and Upper Delaware Scenic and Recreation River. You supervise four full time and four to six intermittent Telecommunications Technicians, GS-392-6. You direct the planning of the Center operations, serves as Terminal Agency Control Officer for the Commonwealth Law Enforcement Assistance Network (CLEAN) terminal. You also serve as the Park's System Administrator for the National Incident Based Reporting System (NIBRS), comparing reports and statistics with the Park Safety Officer to ensure accuracy of databases in NIBRS and the Safety Management Information System (SMIS), and oversees the operation of the equipment in the Communications Center. The Center also helps the Law Enforcement Specialist in certain well-defined aspects of court related work; i.e., records support for the law enforcement staff.

You help in preparing the Center budget, in completing the criminal history component of background investigations through extracting information from the CLEAN system, in processing requests for information from the El Paso Intelligence Center. You manage the Park's radio system, performing the following in connection with those duties: (1) ensuring proposed radio system procurements conform to Park Service standards and that clearances have been obtained; (2) signing all purchase requisitions for radio equipment; (3) developing and administering the operational aspects of radio system maintenance contracts; (4) ensuring equipment is maintained at top performance level; (5) applying for new or modified radio frequency assignments; (6) preparing and maintaining inventory of all radio equipment; (7)

maintaining a record for each unit, scheduling service, and coordinating billing procedures; (8) keeping inventory of all frequencies programmed into each radio and submits information annually to the Area Radio Coordinator; and, (9) ensuring that all appropriate personnel receive periodic training in the use of the equipment.

You serve as system administrator for NEAX-1400 telephone system at the Park Headquarters, and perform the following in connection with this responsibility: (1) performing all programming for telephones using NEAX MAT and MOC Software, (2) tracking all telephone calls and produces various reports using SUMMA Prophet software; (3) troubleshooting all telephone problems; (4) preparing and maintaining inventory for all telephone equipment; and, (5) scheduling service and coordinating billing procedures.

You also serve as technical advisor to Park Service management on all telecommunications issues, representing management in contacts with local, State, private vendors, and Federal agencies providing telecommunications to the Park. In addition, you are responsible for: (1) ensuring all telephone procurement actions conforms to Park Service standards; (2) coordinating all requests for telephone service; (3) analyzing telecommunications needs, and recommending telephone systems; (4) scheduling repairs, managing the use of FTS 2000 in the Park, administering FTS 2000 service to all buildings in the Park; and, (5) reviewing all telephone bills to identify and correct errors in billings.

Series and Title Determination

Your agency has determined that your position is classified properly to the Telecommunications Series, GS-391, and warrants titling as Telecommunications Manager because of the program functions assigned with which you have not disagreed. Based on our review of the appeal file, we also concur with these determinations. Accordingly, your position is allocated properly as Telecommunications Manager, GS-391.

Grade Level Determination

The position classification process requires that the full intent of PCS's must be discerned and applied to classify positions properly. The Introduction recognizes that some positions involve performing different kinds and levels of work that, when evaluated separately in terms of duties, responsibilities, and qualifications required, are at different grade levels. The proper grade of such a position is determined by evaluation of the regularly assigned work that is paramount in the position. Usually the highest level of work performed a majority of the time is grade-determining.

When, however, the highest level of work is a smaller portion of the position, it may be grade controlling only if:

-- The work is officially assigned to the position on a regular and recurring basis;

-- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and

-- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

The primary purpose of your position is technical program management that is evaluated properly by application of the Telecommunications Series, GS-391 PCS. The GS-391 PCS is written in the Factor Evaluation System (FES) format. Positions graded under the FES format are compared with nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions mark the lower end; i.e., the floor, of the ranges for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the PCS, the next lower level and its lower point level must be assigned unless the deficiency is balanced by an equally important aspect that meets a higher level. The basis of your appeal is that your position was not credited properly for Factors 2 and 3. You did not disagree with your agency's crediting of Level 1-6 (950 points), Level 4-3 (150 points), Level 5-3 (150 points), Levels 6-3/7-b, (110 points), and Level 8-1/9-a (10 points). We have reviewed carefully the levels assigned to these factors, found them to be appropriate, and have so credited your position. Therefore, our analysis focuses on the evaluation of Factors 2 and 3.

Factor 2, Supervisory Controls

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the employee, priorities and deadlines are set, and objectives and boundaries are defined. Responsibility of the employee depends upon the extent to which the employee is expected to develop the sequence and timing of various aspects of the work, to modify or recommend modification of instructions, and to participate in establishing priorities and defining objectives. The degree of review of completed work depends upon the nature and extent of the review; e.g., close and detailed review of each phase of the assignment, detailed

review of the finished assignment, spot-check of finished work for accuracy, or review only for adherence to policy.

At Level 2-4, the supervisor sets the overall objectives and, in consultation with the employee, determines time frames and possible shifts in staff or other resources required. The employee, having developed expertise in a particular telecommunications specialty area, e.g., transmission media, and terminal equipment compatibility or in general telecommunications requirements, is responsible for planning and carrying out the work, resolving most of the conflicts that arise, integrating and coordinating the work of others as necessary, and interpreting policy on own initiative in terms of established objectives. The supervisor is kept informed of progress, potentially controversial matters or unusual conditions with far-reaching implications. Completed work is reviewed from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or achieving expected results.

In contrast, at Level 2-5 the supervisor provides administrative direction with assignments in terms of broadly defined missions or objectives. Within these broad areas of direction the employee has responsibility for planning, designing, and carrying out major studies or projects, and for coordinating with experts both within and outside the organization. Results of the work are considered technically authoritative and are normally accepted without change. If work is reviewed, the review is concerned with matters such as fulfillment of objectives, effect of advice on the overall requirements, or precedents that might apply to other programs. Recommendations for new projects and alteration of objectives are usually evaluated for such considerations as availability of resources, broad goals, or national priorities.

In your capacity as technical program manager, you function within the level of technical oversight and exercise the independence of work planning and accomplishment supportive of Level 2-4. You operate under two levels of technical direction. When dealing with the daily operations of the Com-munications Center, you work under the direct supervision of the Law Enforcement Specialist. Because your direct supervisor is not knowledgeable in the hands-on technical aspects of your duties, you operate with a wide degree of independence and have broad authority and responsibility for technical determinations arising from your work. For Center operations, you and your direct supervisor set overall objectives, determine time frames, set priorities, and establish Center and staff needs. Your supervisor is kept informed of progress toward meeting objectives and is informed of any problems or potentially controversial matters concerning Center operations. Your supervisor's PD of record hold the occupant of his position both technically and administratively

responsible for Center operations that, by their very nature, are constituted law enforcement support functions:

> Manages the Park's Communications Center. . . . [and] assures that the operation complies with Federal Communications Commission (FCC) standards and the Pennsylvania State Police Commonwealth Law Enforcement Assistance Network (CLEAN) computer system which integrates the National Crime Information Center (NCIC) and the National Law Enforcement Tele-communication System (NLETS).

The performance appraisal provided by your agency as part of the appeals administrative report confirms this level of supervision over your work.

On such key long-term telecommunications project as the conversion of the radio equipment at the Delaware Water Gap NRA to the more spectrally efficient "narrowband" radio technology and the replacement of the repeater systems through the Park by January 1, 2005, your direct supervisor is kept informed of progress but is not otherwise involved. Funding for the narrowband radio implementation is to be provided to the Field Operations Technical Support Center and coordinated through the Field Director's designated Regional Radio Coordinators. The transition to the new technology will be accomplished under the supervision and concurrence of the National Park Service Narrowband Radio Policy Committee, chaired by the Chief, Branch of Radio Frequency Manage-ment, WASO. For both Center operations and long-term telecommunications projects, you coordinate work with your supervisor, subordinates, various commercial telecommunications equipment vendors, NIBRS coordinators and computer programmers, and other National Park personnel.

Your work is reviewed for effectiveness in meeting narrowband and repeater telecommunications systems requirements, feasibility and compatibility by the Chief, Branch of Radio Frequency Management, WASO. The technical super-vision implicit at Level 2-4 for these projects is vested in and is integral to the program management authority of Mr. Weed's position. You are also responsible for all technical determinations arising from Communications Center operations, but the work is also reviewed for overall feasibility and effectiveness by your direct supervisor. This high degree of independence and responsibility is consistent with Level 2-4, which includes supervisory review but is far more restricted in its nature than that which is reviewed for the broad goals or national priorities found at Level 2-5. Level 2-4 but does not require full responsibility for independently planning, designing, and carrying out major projects, as would be required at Level 2-5.

In summary, we find that you occupy a traditional staff role where you are assigned specific work to carry out, and that your work receives a definable degree of technical

review. As at Level 2-4, you keep your supervisor informed of potentially controversial situations. Furthermore, as discussed above, your supervisor's position is vested with both technical and administrative control over all work operations within the Center and is held accountable for all Center functions. This clearly exceeds the type of administrative supervision normally expected at Level 2-5. In addition, the results of your work cannot be said to be authoritative in that your position is not assigned the authority upon which this would be predicated. You do not, for example, make actual decisions on program matters but, in keeping with your staff role, you make recom-mendations that are subject to review by your supervisor. In short, Level 2-5 does not merely represent a high degree of technical independence, but also a corresponding management role that is well beyond the authority actually vested in your position. It derives not only from the technical latitude afforded, but also from the position's role in the organization and the authority delegated to define the basic content and operation of the program beyond the technical aspects of discreet assignments. Neither the absence of immediate supervision for day-to-day operations, nor the fact that technical recommendations are normally accepted, serves to support a level above Level 2-4. Accordingly, this factor is evaluated properly at Level 2-4 (450 points).

Factor 3, Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides used include, for example: established procedures and policies, traditional practices, and reference material such as manuals and handbooks. Guidelines should not be confused with knowledge described under Factor 1 - Knowledge Required by the Position. Guidelines either provide reference data or impose certain constraints on the use of knowledge.

At Level 3-3, guidelines available and regularly used in the work are in the form of agency policies and implementing directives, manuals, handbooks, and locally developed supplements to such guides, such as site plans, equipment specifications, software characteristics, and detailed work procedures and directives that supplement agency directions. The guidelines are not always applicable to specific conditions or there are gaps in specificity in application to specific telecommunications requirements. This level also includes work situations in which the employee must interpret and apply a number of subject-matter policies and regulations such as those that apply to access to and protection of LAN terminals and data bases. The employee uses judgment in interpreting, adapting, and applying guidelines, such as instructions for using particular versions of software, security requirements, or variations in available hardware. The employee independently resolves gaps or conflicts in guidelines according to project requirements, consistent with telecommunications program objectives.

In contrast, Level 3-4 guidelines provide a general outline of the concepts, methods, and goals of telecommunications programs. Those guidelines regularly applied at this level are not specific in how they are to be defined, applied, and monitored. Sometimes available guidelines have been purposely left open to local interpretation to allow for variations in local and remote environmental conditions that affect the nature of communications systems designed to satisfy overall policy direction. Also included at this level are broad guidelines issued by other agencies such as the Federal Communications Commission. Due to the lack of specificity, the guidelines are often insufficient to accomplish particular objectives. The employee uses initiative and resourcefulness in researching trends and patterns, to deviate from traditional methods, and to implement new and improved communications methods and procedures. The employee establishes criteria for identifying and analyzing developments in telecom-munications technologies, and for measuring organizational effectiveness in achieving telecommunications objectives and goals. Assignments at this level may also include responsibility or developing guides for use by tele-communications specialists at the same and lower levels in the organization.

We find the guidelines you use, and the interpretive demands flowing from them, compare closely to Level 3-3. Park Service Standard Operating Procedures (SOP's) for law enforcement and emergency incidents are in place. The NPS 15, Wireless System: Engineering and Management, defines policies and procedures involving radio operations. Also available for your use are NPS guidelines and manuals, Code of Federal Regulations (CFR) pertaining to your program operations, Public Safety Communications manuals and Pennsylvania and New Jersey State Criminal Codes. Some operating procedures you and your staff use fall below Level 3-3. In obtaining criminal records and vehicle information through the NCIC computer you must follow the strict guidelines and procedures set forth by the Federal Bureau of Investigation (FBI) and the U.S. Department of Justice.

Your responsibilities for the daily operations of the Communications Center, e.g., ensuring proper equipment maintenance, applying for frequency assignments, and preparing equipment inventories require you to use judgment in interpreting, adapting and applying the existing guidelines available to you. Guidelines of this nature are broader and less specific than those applying to the law enforcement and incident reporting activities of the Communications Center. There are wide variations in the telecommunications equipment, e.g., radio, telephone, and computer systems under your control. Therefore you exercise considerable latitude in determining the appropriate course of action to follow, resolving gaps or conflicts in the guidelines according to the specific location and type of problem or need. The gaps, however, pertain to a small-scale communications system as is recognized under Factor 1. While your position appears, on the surface, to exceed Level 3-3 as to the nature of the guidelines; i.e., your control of local processes and procedures, the judgment

needed to develop and implement these procedures, many of which must adhere to specifically defined NPS requirements, does not exceed Level 3-3.

The key long-term projects of planning and arranging for the selection, funding, purchase, and installation of the new narrowband digital radio and repeater telecommunications systems, are characterized by specific guidelines established by National Park Service Narrowband Radio Policy Committee and the Chief, Branch of Radio Frequency Management, WASO. Therefore, the nature of the guidelines available to you to expedite the long-term projects also does not meet Level 3-4.

Therefore, your position is evaluated properly at Level 3-3 (275) points.

In summary, we have evaluated your GS-391 technical duties as follows:

Factor	Level	Points
1	1-6	950
2	2-4	450
3	3-3	275
4	4-3	150
5	5-3	150
6&7	3b	110
8&9	1a	10
		2,095 Total Points

The total of 2,095 points falls within the GS-9 grade level point range of 1855-2,100 points in the Grade Conversion Table in the GS-391 PCS.

The GS-391 PCS directs that positions meeting the criteria of the GSSG for evaluation as supervisory should be evaluated by the criteria in that PCS for their supervisory duties. Because your position includes both supervisory, (approximately 30 percent of your time), and nonsupervisory work, both sets of duties must be evaluated.

The GSSG is used to grade supervisory work and related managerial re-sponsibility that require accomplishment of work through the combined technical and administrative direction of others; constitute a major duty occupying at least 25 percent of the position's time; and meet at least the lowest level of Factor 3 in the GSSG based on supervising Federal civilian employees, Federal military or uniformed service employees, volunteers, or other noncontractor personnel. Work performed by contractors is considered in applying the grading criteria within each

factor provided the position first meets the coverage requirements described above based on supervision of noncontractor personnel.

GSSG instructions stipulate that supervisory duties are to be evaluated by comparing them with each factor. Points are credited to a position for the highest factor level that is met according to the instructions specific to each factor level. For a position factor to warrant a given point value, it must be **fully** equivalent to the overall intent of the selected factor level description. If the position fails in any significant aspect to meet a particular factor level description in the Guide, the point value for the next lower factor level must be assigned, unless the deficiency is balanced by an equally important aspect that meets a higher level. If one level of the factor is exceeded, but the next higher level is not met, credit is to be given for the lower level involved. The total points are accumulated under all factors and converted to a grade level based on application of the Point-to-Grade Conversion Table.

You did not disagree with your agency's application of the GSSG. Your agency credited Level 1-1 (175 points), Level 2-1 (100 points), Level 3-2 (450 points), Level 4A-2 (50 points), and Level 4B-2 (75 points). We have reviewed carefully the levels assigned to these factors, found them to be appropriate, and have so credited your position. We do not, however, concur with your agency's assessment of Factors 5 and 6, our analysis of which follows.

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, and 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.

For first level supervisors, the level selected is the highest grade which:

-- best characterizes the nature of the basic (mission oriented) nonsupervisory work performed or overseen by the organization directed; and

-- constitutes 25 percent or more of the workload (not positions or employees) of the organization.

This means that 25 percent or more of the nonsupervisory duty hours of subordinates and others (based on estimates derived from position descriptions, supervisors, staffing studies, or contract documents) is expended on work at or above the base level credited, or, where extensive contract work is overseen, that 25 percent or more

of the dollars spent on human services is for work at or above that level. It includes the workload of General Schedule subordinates, Federal Wage System employees, assigned military, volunteers, student trainees or non-Federal workers, such as contractor employees, State and local workers, or similar personnel.

In determining the highest level of work that constitutes at least 25 percent of workload or duty time, trainee, developmental, or other work engineered to grades below normal full performance levels is credited at full performance levels. Excluded from consideration are:

- the work of lower level positions that primarily support or facilitate the basic work of the unit;
- any subordinate work that is graded based on criteria in this guide (i.e., supervisory duties) or the Work Leader Grade-Evaluation Guide;
- work that is graded based on an extraordinary degree of independence from supervision, or personal research accomplishments, or adjust the grades of such work for purposes of applying this guide to those appropriate for performance under "normal" supervision;
- work for which the supervisor or a subordinate does not have the responsibilities defined under Factor 3.

Your agency has evaluated this factor at Level 5-3 (340 points) using a base level of grade GS-6, the level to which all your subordinate positions are classified currently. Our fact-finding revealed you supervise four full-time and from four to six intermittent employees occupying Telecommunications Tech-nician, GS-392-6 positions. The number of intermittent employees increases during the summer months and other high peak periods; i.e., weekends and holidays. These employees provide radio dispatch and report services for law enforcement and various other Park personnel. Normally, one dispatcher is on duty in the Center at one time, but two dispatchers work during peak periods and when emergencies substantially increase the coverage needs of the Center, e.g., infrequent multiple vehicle accidents and fires. The dispatchers also perform some law enforcement support duties. For example, they are responsible for filing and storing the citations and warnings issued by law enforcement officers. They operate the communications terminals (computer equipment) to access National Crime Information Center (NCIC), the National Incident Based Reporting System (NIBRS), and the Parks

Services' Case Incident Reporting System at the request of the law enforcement officials, transmitting the factual information back to the law enforcement officials.

The de novo classification appeal process requires that we independently review base level as part of our application of the GSSG. Our factfinding revealed the positions occupied by the employees in the unit are classified correctly to the Dispatching Series, GS-2151. This series covers work involved in dispatching or scheduling motor vehicles, trains, aircraft or vessels, used for transporting passengers, mail, equipment, or supplies by assigning vehicles, keeping records and reports, and providing route and destination information and instructions to the drivers, engineers, or pilots. The primary and paramount function of your staff is relaying destination information, and factual information from law enforcement data bases, to support Park law enforcement personnel. They operate computerized communications equipment and commercially available two-way radio equipment to relay this information.

The GS-2151 does not contain published grade-level criteria. We concur with your agency's choice of the Telecommunications Processing Series, GS-390 PCS for grade level determination purposes in that it provides criteria appropriate for evaluating both the equipment operations and related clerical functions integral to Center dispatching operations. Your agency credited Level 1-3 (350 points), Level 4-2 (75 points), Level 5-2 (75 points), Level 6/7 2a (45 points), Level 8-1 (5 points), and Level 9-1 (5 points). We have reviewed carefully the levels assigned to these factors, found them to be appropriate, and have so credited your position. We do not, however, concur with your agency's assessment of Factors 2 and 3, our analysis of which follows.

Factor 2, Supervisory Controls

At Level 2-2, the supervisor provides general instructions concerning established practices and policies, and provides instructions on special circumstances and changes in priorities. The supervisor provides training classes on new pro-cedures. Employees work independently within established procedures and make minor deviations based on experience. They consult with the supervisor when normal approaches and procedures do not solve the problems. The supervisor occasionally spot-checks work for quality and checks logs for quantity of messages processed.

In contrast, at Level 2-3 the supervisor provides general instructions to cover anticipated problems. The supervisor helps employees with high priority unusually complex problems, such as system outages that do not respond to standard or other precedented combinations of computer commands. Employees identify problems, make decisions under pressure to restore system operations promptly, and take

corrective action. This sometimes requires adapting and modifying operating procedures. The supervisor reviews completed work for adequacy of technical decisions and timeliness of actions taken.

The Classifier's Handbook clarifies how this factor is to be applied to clerical positions. It states that the nature and extent of work review ranges from close and detailed, to spot check, to general review. However, it is not just the degree of independence that is evaluated, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment. For example, many clerical employees perform their work with considerable independence and receive very general review. This work, however, is evaluated at the lower levels of this factor because there is limited opportunity to exercise judgment and initiative.

Your subordinates perform their recurring work with independence typical of Level 2-2 assignments where employees are expected to proceed with recurring operations without supervisory assistance or interruption. Your subordinates operate communications equipment by applying well-established, directly applicable procedures. They record Daily Logs, Incident Reports and various other reports for supervisory inspection and approval according to exacting security requirements. This fully meets Level 2-2 in the GS-390 PCS.

Your subordinates do not work with the freedom from supervision and independent exercise of analytical judgment found at Level 2-3. They are not, on a regular and recurring basis, and for a substantial amount of their work time, required to deal with such unusual or difficult situations as systems outages or other complex problems, and to modify and adapt operating procedures. These judgments are vested in your position as Center manager as reflected in the written appeal record and confirmed during our on-site factfinding. Accordingly, the position is credited properly at Level 2-2 (125 points).

Factor 3, Guidelines

At Level 3-2, the employees use established procedures, manuals for the operation of the telecommunications system, and routing guides that show the proper address codes for organizations. The guidelines are numerous, but are specific and detailed on how to solve common problems. Employees must choose the appropriate manual or guide and may make minor adaptions of established procedures. Employees recognize and refer to the supervisor unusual problems not covered specifically by the guidelines, such as conflicting computer error messages that do not respond to corrective actions.

In contrast, at Level 3-3, manuals, guidelines, and procedures are available and cover recurring work. For example, the guides cover normal equipment problems and provide corrective operator commands and procedures. They list the usual error codes that appear on the screen or on printouts and show the appropriate remedial actions to keep messages flowing smoothly through the switching or relay center. The guidelines do not apply completely to unusual problems. They provide only general guidance for situations not previously encountered. Employees must use judgment in adapting or deviating from operating manuals and established procedures and in finding related precedents to solve unusual problems, such as conflicting error messages or program deficiencies.

The guidelines available to and used by your subordinates closely match Level 3-2. They include written NPS SOP's for law enforcement and emergency incidents, on equipment operations, law enforcement paperwork support, and procedures on computer operations problems and reporting major incidents. Our fact-finding revealed NCIC guidelines and procedures are specific, and must be adhered to strictly. Although their PD references Code of Federal Regulations, Public Safety Communications manuals and Pennsylvania and New Jersey State Criminal Codes, these manuals are not used and applied on a regular and recurring basis within the meaning of the position classification system. As discussed previously in this decision, the incumbents provide support to law enforcement officials. They are neither required nor permitted to apply a substantive knowledge of criminal statutes as would be expected of law enforcement personnel. The judgmental demands stated in the PD (F4320-082/600/817/900, classified as Telecommunications Technician, GS-392-6), also conflict with the technical interpretive responsibilities contained in your PD, certified as current and accurate by both you and your supervisor. These controls preclude the position from exceeding Level 3-2 in the GS-390 PCS.

The dispatching duties of your subordinates are analogous to a typical work assignment in the Park Ranger Series, GS-025 PCS:

> Conducts a radio dispatch operation: provides communications service for operational activities in areas such as emergency assistance, law enforcement, and firefighting support. Receives all routine and emergency telephone and radio calls placed to park headquarters; maintains communications records including radio logs. Codes, logs, files, and routes all violation notices, courtesy tags, and traffic and boating accident reports.

Your subordinates' work does not require possession and exercise of the full range of GS-025 occupational knowledge required for allocation to that series. However,

the above work assignment illustration confirms the following conclusion reached in our application of the GS-390 PCS to the position:

Factor	Level	Points
1	1-3	350
2	2-2	125
3	3-2	125
4	4-2	75
5	5-2	75
6&7	2a	45
8	8-1	5
9	9-1	5
		805 Total Points

The total of 805 points falls within the GS-4 grade level point range of 655-850 points on the FES Grade Conversion Table.

Accordingly, we find that GS-4 is the highest level of work directed that meets the requirements for this factor, which results in the crediting of Level 5-2 (205 points) to your position.

Factor 6 - Other Conditions

This factor measures the extent to which various conditions contribute to the difficulty/complexity of carrying out supervisory duties, authorities, and responsibilities. Conditions affecting work for which the supervisor is respon-sible (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 authorities.

To evaluate Factor 6, two steps are used. First, the highest level that a position meets fully 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. The GSSG directs that if three of these eight situations is present than the position is to be evaluated at one level higher. The eight special situations are: (1) Variety of Work, (2) Shift Operations, (3) Fluctuating Work Force or Constantly Changing Deadlines, (4) Physical Dispersion, (5) Special Staffing Situations, (6) Impact of Specialized Programs; and (7) Changing Technology, (8) Special Hazard and Safety Conditions.

The GSSG must be applied in an internally consistent manner. In evaluating Factor 6, therefore, we must first locate the factor level description that recognizes the level of work led as credited in Factor 5. Tentatively selecting that factor level, we must assess whether the position performs the full range of coordination and work integration responsibilities found at that level. If both of those requirements are met, then that factor level may be credited to the position.

At Level 6-1, the work supervised involves clerical, technical, or other work comparable in difficulty to the GS-6 level or lower. This could vary from basic supervision over a relatively stable workforce performing work operations that are routine, to a level of supervision that require coordination within the unit to ensure that timeliness, form, procedure, accuracy, quality and quantity standards are met in individual cases. You supervise work that we have evaluated at the GS-4 level, and your supervision requires coordination within the unit to ensure that timeliness and other aspects of Center operations are met.

At Level 6-2, the work supervised involves technician and/or support work at the GS-7 or GS-8 level. This level may also be credited when the supervisor has full and final technical authority over work at the GS-4, 5, or 6 level. Full and final technical means that the supervisor is responsible for **all** technical determinations arising from the work, without technical advice or assistance on even the more difficult and unusual problems, and without further review except from an administrative or program evaluation standpoint. Credit for this aspect should be limited to situations involving an extraordinary degree of finality in technical decision making. Although you are responsible for all hands-on technical communications operations of the Center, you do not have full and final technical authority and is not responsible for all technical determinations over key aspects of Center work. For example the full and final authority for the key long-term telecommunications projects at the Delaware Water Gap NRA resides with the National Park Service Narrowband Radio Policy Committee, and the Chief, Branch of Radio Frequency Management, WASO. The law enforcement program involvement inherent in Center operations, and the control exercised over those issues by your supervisor, preclude crediting full and final authority for that work to your position.

Your agency evaluated your position at 6-2 (575 points) based on evaluating your position at Level 6-1 and subsequently crediting your position with three of the eight *Special Situations*; (2), Shift Operations, (3) Constantly Changing Deadlines, and (7), Changing Technology. We have reviewed carefully the special situations credited, concur with the assignment of Shift Operations, and have so credited your position. We do not, however, concur with your agency's assessment the remaining two situations, our analysis of which follows.

3. Fluctuating Work Force or Constantly Changing Deadlines

The GSSG provides for crediting Fluctuating Work Force when the work force supervised by the position has large fluctuations in size (e.g., when there are significant seasonal variations in staff) and these fluctuations impose on the supervisor a substantially greater responsibility for training, adjusting assignments, or maintaining a smooth flow of work while absorbing and releasing employees. Constantly Changing Deadlines may be credited when frequent, abrupt, and unexpected changes in work assignments, goals, and deadlines require the supervisor constantly to adjust operations under the pressure of continuously changing and unpredictable conditions.

The position classification process requires that the full intent of a PCS be discerned and applied according to established classification principles and practices that do not permit crediting the same aspects of a position multiple times. We may not credit dealing with the impact and assignment issues under Shift Operations, which we agree creditable to your position, and this situation. As a threshold PCS, Special Situations requires that three of eight situations be met fully to add an additional level under Factor 6. The presence of a substantial number of and widely varying alternative situations shows the GSSG recognizes many positions may meet one or two additional demands, but not three and, therefore, will not receive an additional level for this factor.

These situations deal with various conditions not credited fully in applying earlier portions of the GSSG. For example, Factor 3 covers the demands of work planning, scheduling, employee instruction, and similar inherent supervisory duties and responsibilities. In crediting Level 6-1 to your position, we acknowledged the coordinative demands of your position within the unit to assure that timeliness, form, procedure, accuracy, quality and quantity standards are met in individual cases.

Center work assignments, goals, and deadline changes are not frequent and abrupt within the meaning of the GSSG. Summer demands, as well as holiday and weekend staffing requirements are, in most instances, predictable in nature and do not require you to constantly adjust Center operations under the pressure of continuously changing and unpredictable conditions. The relatively predictable peaks and valleys of activity based on historical information, fail to meet the frequency, abruptness and unexpected nature of changes required for the crediting of this situation to your position.

7. Changing Technology

The GSSG credits this situation when processes and procedures vary constantly because of the impact of changing technology, creating a requirement for extensive training and guidance of the subordinate staff.

You are engaged in a 5-year major equipment upgrade initiative; i.e., narrow band conversion. It is anticipated that this major equipment change will require frequent staff training over that extended time frame much more intensive than typical Center training needs. This approaches the intent of **constantly** varying processes and procedures due to the impact of changing technology within the meaning of the GSSG, and extensive staff training and guidance to implement these changes. Your position may, in the future, warrant credit for this situation on a time limited basis as the project unfolds. However, current conditions do not meet the intent of this situation fully and, therefore, it may not be credited to your position at this time.

Therefore, your position is properly credited at Factor Level 6-1 (310 points), and cannot be evaluated one level higher as only one of the eight *Special Situations* can be credited.

In summary, we have credited your position as follows:

Factor		Level	Points
1		1-1	175
2		2-1	100
3		3-2	450
4			
	A.	4A-2	50
	B.	4B-2	75
5		5-2	205
6		6-1	310
			1,365 Total Points

The total of 1,365 points falls within the GS-7 point range of 1,355-1,600 points in the GSSG Point-to-Grade Conversion Chart. We, therefore, find that your position is evaluated properly to the GS-7 grade level by application of the GSSG.
Based on the above analysis, it is our decision that your position is classified properly as Telecommunications Manager, GS-391-9.

Please be assured that this decision is not intended to reflect on your abilities, qualifications, or the quality of your performance. Rather, it reflects our evaluation

of your position based on a comparison of your duties and responsibilities with the appropriate standards.

Sincerely,

Robert D. Hendler
Classification Appeals Officer

cc:
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National Park Service, Delaware Water
Gap National Recreation Area
Bushkill, PA 18324

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