

**U.S. Office of Personnel Management
Division for Human Capital Leadership & Merit System Accountability
Classification Appeals Program**

Chicago Field Services Group
230 South Dearborn Street, Room 3060
Chicago, IL 60604-1687

**Pay Category Appeal Decision
Under section 5103 of title 5, United States Code**

Appellant: [appellant]

Agency classification: Electronics Mechanic
WG-2604-10

Organization: Detachment 1
755th Communications Squadron
55th Wing
Air Combat Command (ACC)
U.S. Air Force
[city and state]

OPM decision: Properly assigned to the
Federal Wage System

OPM decision number: C-2604-00-04

/s/ Marta Brito Pérez

Marta Brito Pérez
Associate Director
Human Capital Leadership
and Merit System Accountability

March 22, 2005

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 jobs 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 Job Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Subchapter S6-6 of the Federal Wage System (FWS) Operating Manual requires agencies to provide sufficient information to allow proper grading of job descriptions (JD's) when OPM standards are applied. As discussed in this decision, the agency needs to revise the appellant's JD to reflect the full scope of the appellant's assignments to meet the required standard of adequacy. The servicing human resources (HR) office must submit a compliance report containing the corrected position description and a Standard Form 50 showing the personnel action taken. The report must be submitted within 30 days from the date of this decision.

Decision sent to:

[appellant]
[address]
[city and state]

Civilian Personnel Officer
Department of the Air Force
755th Communications Squadron
55th Wing (ACC)
[city AFB, state]

Chief, Civilian Classification Section
Department of the Air Force
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[city AFB, state]

Director of Civilian Personnel
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Washington, DC 20330-1040

Introduction

On May 28, 2004, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a pay category appeal from [appellant]. His job is currently graded as Electronics Mechanic, WG-2604-10. The job is located in [city and state] and assigned to Detachment 1, a geographically separated unit of the 755th Communications Squadron, 55th Wing, Air Combat Command (ACC), [city] Air Force Base (AFB), in [city and state]. We received the complete agency administrative report on May 28, 2004. We have accepted and decided his appeal under section 5103 of title 5, United States Code (U.S.C.).

To clarify the record, we conducted telephone audits with the appellant on August 20 and 23, 2004, and interviewed his immediate supervisor, [supervisor], a WS-2608-11, Digital Computer Mechanic Supervisor, by telephone on August 24, 30 and 31, 2004. We also conducted a telephone interview with [specialist], a GS-346-12, Logistics Specialist and the High Frequency Global Communications Systems (HFGCS) Program Manager at [city] AFB, on August 30, 2004. The appellant lists [specialist] as someone knowledgeable of the work the Detachment performs on the System Capable of Planned Expansion (SCOPE) Command. [specialist's] position was formerly classified in the Telecommunications Series, GS-391. In reaching our decision, we have reviewed all information furnished by the appellant and his agency, including his official job description (JD) and incorporate it into the record.

General issues

The appellant is assigned to JD number [XWXXX] graded as Electronics Mechanic, 2604-10. He indicates that his JD omits major duties concerning his troubleshooting and repair of network and telephone equipment and omits the associated knowledge required of computer operating systems. He believes his job should be classified under the General Schedule (GS) pay system rather than the Federal Wage System (FWS) because, among other things, he spends the majority of his time monitoring a highly complex communications system rather than performing manual work.

The appellant asked us to conduct a desk audit of his position. There is no right to a hearing or audit in the classification appeal process. We give the agency and appellant a full opportunity to send us any pertinent written material. We typically conduct desk audits when we determine that the development of facts sufficient to allow us to make a sound classification decision require an on-site desk audit. In this case, we found the record furnished sufficient information when augmented by telephone audits and interviews to clarify the major duties assigned to and performed by the appellant.

Subchapter S6-6 of the FWS Operating Manual requires agencies to provide sufficient information to allow proper grading of JDs when OPM standards are applied. While the appellant's supervisor certifies the official JD as current and accurate, we find the duties outlined there only address the radio segment of the appellant's duties and overlook his other major activities. Therefore, the agency needs to revise the appellant's JD to reflect the full scope of the appellant's assignments to meet the required standard of adequacy.

Job information

The appellant is one of three Electronics Mechanics (two WG-10 and a WL-10) assigned to Detachment 1 of the 755th Communications Squadron. The five member Detachment also includes a WG-7 Maintenance Worker and a WG-3 Laborer. The appellant reports through the Leader to a WS-11 Digital Computer Mechanic Supervisor in the Squadron at [city] AFB, who appraises the appellant's performance based in part on technical input from the Lead Electronics Mechanic in the Elkhorn Detachment.

His supervisor directs about 34 employees, including 5 in Detachment 1. Most (21) of the other employees, like the appellant, occupy jobs in the 2604 Electronics Mechanic series. Six occupy jobs in the 2608 Digital Computer Mechanic series. The remaining two are positions classified in the Clerk-Typist Series, GS-322.

Detachment 1 of the 755th Communications Squadron maintains one of over a dozen SCOPE Command ground stations, which are undergoing modernization, replacing older, tube operated, high frequency (HF) radios and associated control equipment with solid state, commercial off-the-shelf, non-developmental items and the latest computerized control techniques. The ground stations allow remote or local operator selection of operating frequencies, sideband selection, transmitter power, antenna selection, azimuth selection for directional antennas, half or full duplex operation, and automatic link establishment. The stations, among other things, provide air-ground-air, ship-to-shore, and broadcast communications.

The appellant indicates that he troubleshoots, repairs, and replaces all components in the SCOPE Command system, which is comprised of radio, computer, and telephone equipment. The system's computer interface includes three local area networks and one wide area network running on three platforms: Windows, UNIX, and DOS. The networks incorporate a variety of equipment, including computer work stations, routers, hubs, digital electronic switches, and servers. The system's telephone interface includes, among other things, various switches such as private branch exchanges (PBXs) and integrated digital network exchanges (IDNXs); signal processors like multiplexers and channel service units (CSUs); and device adapters; and utilizes packet switching protocols like multiple frame relay.

Pay category determination

Section 5103 of 5 U.S.C. requires that OPM determine finally the applicability of section 5102 of title 5. Section 5102(c)(7) exempts from the General Schedule employees in recognized trades or crafts, or other skilled mechanical crafts, or unskilled, semiskilled, or skilled manual-labor occupations, and other employees in positions having trade, craft, or laboring experience and knowledge as the paramount requirement. The *Introduction to the Position Classification Standards* defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. Whether a position is in a trade, craft, or manual labor occupation depends primarily on the duties, responsibilities, and qualification requirements; i.e., the most important, or chief, requirement for the performance of a primary duty or responsibility for which the position exists. If a position clearly requires trade, craft, or laboring experience and knowledge to perform its primary duty, the position is under the FWS.

Therefore, a job is exempt from the GS only if (a) its primary duty or responsibility requires trades, crafts, or laboring experience and knowledge, and (b) that requirement is paramount (i.e., it embodies the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibility for which the job has been established). A position is subject to the GS, however, even if it does require physical work, if its primary duty requires knowledge of an administrative, clerical, scientific, artistic, or technical nature not related to trades, crafts, or manual labor work.

Maintenance and repair work is typically regarded as trade or FWS work and usually is performed in or from a shop. Evaluation and design work is typically regarded as technician or GS work and usually is performed in a laboratory or under the direction of an individual with professional training in the appropriate field of work.

As an example of trade work, the Job Grading Standard (JGS) for Electronics Mechanic, 2604, indicates the work involves fabricating, overhauling, modifying, installing, troubleshooting, repairing, and maintaining electronic equipment that may require the use of a computer to troubleshoot, program, or align components or systems.

Such work, however, is excluded from FWS when it is performed by non-professionals incidental to the development and evaluation of equipment under the direction of an engineer. The 2604 JGS, for example, notes that engineering testing, analysis, alignment, and performance evaluation of complex electronic systems is GS work covered by the Position Classification Standard (PCS) for the Electronics Technician series, GS-856.

Similarly, the PCS for the Telecommunications series, GS-391, notes that testing and evaluating communication equipment, systems, networks, and facilities is GS work covered by the standard. Specialists in this line of work design, develop, monitor, coordinate, and conduct a variety of technical and operational tests and evaluations. They review and analyze test data, make technical judgments, and prepare decisions and recommendations concerning the quality, acceptability, and need for changes and improvements in equipment and systems.

Work that involves a mix of trade and technician or specialist duties is classified according to its primary duty, or reason for existence, which is indicated by such factors as (a) the nature of work products or services of the organization, (b) working relationships with other jobs in the organization, (c) normal lines of career progression, (d) equitable pay relationships with other jobs in the immediate organization, and (e) management's intent, or purpose, in creating the job.

Nature of work products or services

The appellant suggests that his duties relate to specialist or technician work, rather than trade work because, among other things:

- his duties require understanding of four distinct technologies, each in and of itself a separate field: computers, networking, telephone, and radio.

- as a beta test site for the SCOPE Command system, the site he maintains experiences novel problems for which he must determine the appropriate remedy through analysis of the system and component subsystems.
- he develops procedures for new upgrades and technologies that impact other SCOPE Command sites around the world.
- the Electronics Mechanic, 2604, job series covers the troubleshooting and repair of equipment rather than complex systems like the SCOPE Command.

Some of the points the appellant raises could relate to GS rather than FWS work since technician and mechanic tasks tend to overlap in the cited areas. Regarding the appellant's last point, however, FWS work may involve troubleshooting and repair of either equipment or systems and so is not distinguishable from GS work solely in this respect.

Telecommunications Mechanic, 2502, and Electronic Integrated Systems Mechanic, 2610, for example, both concern the repair and maintenance of systems. Telecommunications Mechanics analyze system failures and unusual occurrences to isolate the source of the problem and to determine whether hardware, software, or other factors are to blame. Integrated systems mechanics monitor the operation of complex interrelated subsystems, analyze operating trends, and propose preventive maintenance to assure continued operating capability. They study technical data and equipment specifications to determine the impact that equipment modifications or substitutions will have upon total system operation and on the various maintenance and alignment procedures.

GS work is distinguished from FWS work by the type of work performed rather than the type of equipment or system involved. Regular and significant technical evaluations, development of specialized circuits or components, and complex modifications to standard equipment are hallmarks of GS technician work, for example. Accordingly, we requested specific work examples of technical studies, written evaluations, design alterations, or equipment modifications the appellant performed.

The examples the appellant provided in response to our request proved more descriptive of the system links and operation rather than evaluative of the system design and optimal performance. Absent were summarizations of data analysis and written recommendations for design modifications. GS technicians might produce such products in support of engineering studies, though FWS mechanics typically would not.

Several of the written products the appellant furnished show channel and node assignments, signal source, and related information necessary for tracing system interconnections. Another shows wiring color, signal source, punch block location, cable identifiers, and related information. While the documents are essential to troubleshooting the communications system, such mapping may be done by mechanics or technicians to aid operation and troubleshooting. Technicians rather than mechanics, however, might under direction of an engineer study and evaluate the interconnections to optimize wiring or recommend design improvements. Such assignments, though, do not appear to be a regular and recurring part of the appellant's work.

None of the specific work examples the appellant provided illustrate significant use of specialized, complicated techniques such as technicians would employ in assessing unusual equipment applications or devices. None reflect the analysis of considerable and conflicting technical data as part of a telecommunications or engineering study. None of them were performed as integral parts of the engineering studies typical of GS work. Instead they reflect work readily associated with the operation, maintenance, and repair functions that FWS encompasses.

We find this aspect of the appellant's work is trade in nature.

Working relationships with other jobs; career progression; and pay equity,

There is no technician, specialist, or other GS positions presently among the approximately 34 jobs within the appellant's organization. Progression within that organization is limited to leader or supervisory FWS jobs. Engineering, technician, and specialist positions exist in organizations the appellant works with. The appellant provides others in these positions technical feedback on the system operation and faults, but conducts no extensive data analyses nor prepares written evaluation reports on their behalf.

Consequently, we find these aspects of the appellant's work are trade in nature.

Management's intent

The appellant says that his fundamental responsibility is to keep the Elkhorn site operational with minimal downtime. His supervisor agreed, adding that the appellant's job is highly visible and that when the system goes down, phones start ringing. Such responsibility reflects management's primary concern that the job focus on maintenance and operation of the system, rather than on the analysis and improvement of its design. The latter functions are vested in other organizations. For example, engineering and telecommunications staff at [city] AFB assume some of the responsibility for system analysis and design. Additional responsibility belongs to the Joint Interoperability Test Command (JITC), which ensures the interoperability of SCOPE Command with other command, control, communications and computer (C4) systems and acts as the responsible test organization (RTO) for the SCOPE Command.

JITC operates facilities for conformance and interoperability testing of HF equipment. Technician-type test functions performed there are distinguished from the appellant's own mechanic type operational tests in that the facilities, among other things, develop the test requirements and specifications and prepare written technical reports on equipment performance that are useful for design improvements and equipment certification. The appellant's testing, in contrast, is primarily to determine operational readiness of the system or to troubleshoot and isolate the source of substandard system performance.

We find this aspect of the appellant's work is trade in nature.

Summary

Since all factors indicate the appellant's primary duty is trade-related and the essential, paramount knowledge, skills, and abilities needed to perform the primary duty are trade-related, his job is exempt from the GS and assigned to the FWS.

Decision

The appellant's job is properly covered by the FWS.