

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

Washington Oversight Division
1900 E Street, N.W.
Washington, D.C. 20415

**Classification Appeal Decision
Under Section 5103 of Title 5, United States Code**

Appellant: [name]

Agency classification: Electronic Equipment Installation and
Maintenance Inspector
WG-2601-12

Organization: [section]
[logistics group]
Air Force Reserve Command
U.S. Air Force
Department of Defense
[Air Force base and State]

OPM decision: Federal Wage System
(Pay system determination only)

OPM decision no. : C-2601-00-01

Richard Quasney
Classification Appeals Officer

May 17, 1999

Date

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision constitutes a classification 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 the conditions and time limits specified in title 5, Code of Federal Regulations, sections 511.605, 511.613, and 511.614, as cited in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

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Introduction

On December 23, 1998, the Washington Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a position classification appeal from [appellant], Electronic Equipment Installation and Maintenance Inspector, WG-2601-12, as part of a group appeal filed by [appellant], et al. (Aircraft Work Inspectors, WG-8852-11). The appellant is employed in the [section] of the [logistics group], Air Force Reserve Command, at [Air Force base and State]. The appellant requested that his job be reclassified to the General Schedule as Quality Assurance Specialist (Aircraft), GS-1910-10/11. This appeal was accepted and decided under the provisions of section 5103 of title 5, United States Code.

The appellant had previously appealed his pay system classification to the Department of Defense, but that appeal was denied and the current classification to the Federal Wage System sustained on November 24, 1998.

An on-site job audit was conducted by a Washington Oversight Division representative on April 5, 1999. This appeal was decided by considering the audit findings and all information of record furnished by the appellant and his agency, including his official job description, number 75405, classified by the servicing personnel office as Electronic Equipment Installation and Maintenance Inspector, WG-2601-12, on May 7, 1990, and the appellant's written submission of additions and modifications to that document.

Job Information

The major functions of the appellant's job are essentially identical to those of his co-appellants, with the exceptions that he inspects aircraft electronics systems rather than structural and mechanical components, and that he administers the unit crosstell program.

The job description states that the primary purpose of the appellant's job is "to conduct inspections of avionics, radio, radar, instrument, navigation, and other electronic systems and components undergoing repair and modification, and the performance of mechanics during and upon completion of repair actions, to determine acceptability in terms of compliance with established quality standards." This is an accurate summary of the main duties performed by the appellant. The desk audit confirmed that the appellant performs the following more specific duties, and that these duties constitute the major portion of the appellant's time:

- Evaluating assigned personnel performance, documentation, and observable maintenance processes to ensure compliance with technical and procedural directives, and performing inspections on a sample basis. This includes observing maintenance and repair work carried out by electronics technicians in progress to ensure conformance to prescribed technical procedures; physically or visually inspecting parts and components for defects, serviceability, and proper installation; and completing periodic evaluations of maintenance personnel to document their knowledge of the aircraft systems and associated maintenance requirements and procedures, and informing the respective supervisors of corrective actions or additional training needed.

- Serving as technical advisor and assistant to the production work center manager in the resolution of quality problems and maintaining unit product improvement programs. This includes consulting engineers at the Air Logistics Centers (ALC's) on the resolution of parts or equipment problems (e.g., whether a part can be modified to substitute for another part that is no longer available); preparing quality deficiency report (QDR) submissions documenting equipment or system defects/operational problems and inputting these reports to an on-line database; investigating the causes of equipment failures, sending this equipment to the ALC's for repair, and reporting on recurring problems; evaluating and recommending action on unit suggestions and equipment modification proposals; and performing one-time inspections on assigned aircraft as directed.

- Interpreting technical orders, blueprints, aircraft schematics, instructions, and messages regarding aircraft maintenance methods and procedural guidance. This includes reviewing technical orders and other instructions for applicability to the assigned equipment; ensuring that prescribed actions are completed within specified time frames; and maintaining the master technical order library for the Logistics Group.

- Administering the unit crosstell program. This includes reviewing messages received from other maintenance organizations and disseminating information to the appropriate work centers, and relaying maintenance information that may affect other units.

The remainder of the appellant's time is spent on other, miscellaneous functions such as performing weight and balance computations, maintaining associated weight and balance records, and periodically weighing assigned aircraft; performing occasional functional check flight inspections for maintenance; and providing training to reservists assigned to the unit. The appellant also provided a list of other duties performed that are not included in the job description. Some of these duties are very infrequent, such as conducting accident/mishap investigations for the unit; reporting incidents of dropped objects from aircraft; and investigating and reporting foreign object damage to aircraft. Others are actually aspects of other major duties described above, including such functions as impounding aircraft with major operational problems; requesting waivers for temporary use of defective parts; ensuring that tools used are of acceptable quality; determining whether supervisors are taking corrective actions based on personnel evaluations; making recommendations to replace or modify items with a high failure rate; developing local operating instructions for maintenance work; and requesting authorization to repair parts in-house when replacement parts are not available. The appellant is responsible for monitoring, inspecting, and evaluating the work of repair contractors performing on-site work, but this is likewise a relatively infrequent requirement (i.e., about 4-6 times yearly). Also, last year the appellant developed a data base for local use in tracking evaluations and inspections, but this was a one-time occurrence and not a continuing requirement of the job, and thus has no bearing on its classification.

Although the appellant contends that he is performing duties and responsibilities "well outside" his official job description, the desk audit verified that the job description accurately represents

the main functions of the appellant's job. The job description is outdated to the extent that it does not emphasize those duties that have become more prominent, such as personnel evaluations and technical order compliance, and it does not include the various peripheral functions described above that have accrued to the job over the past few years. However, many of the latter are either relatively minor or infrequent duties that constitute a small portion of the appellant's time and thus would not normally be included in a job description; duties that represent requirements associated with other major duties (e.g., impounding aircraft, requesting authorizations and waivers); or duties that are ancillary to the primary work performed (e.g., using personal computers and databases to input data or submit reports). Likewise, the appellant's assertion that he "develops" any aspects of the program was not confirmed. The design of forms for local use does not constitute program development in the sense of determining the overall functions that should be performed and how the work will be accomplished.

This evaluation is based on an assessment of the duties and responsibilities actually being performed by the appellant as presented in the desk audit and in the supporting materials submitted with the classification appeal. Although these duties and responsibilities are basically expressed in the job description, this evaluation is not solely dependent on that document.

Pay System Determination

Guidance on determining pay system coverage (General Schedule versus Federal Wage System) is contained in Section IV of the Introduction to the Position Classification Standards, dated August 1991. This guidance states that the decision as to whether particular types of positions are trades, crafts, or manual labor occupations excluded from coverage under the General Schedule depends primarily on the paramount knowledges, skills, and abilities needed to perform the primary duty or responsibility for which the position has been established. If a position clearly requires trades, crafts, or laboring experience and knowledge as a requirement for performance of its primary duty, and this requirement is paramount, the position is under the Federal Wage System. Conversely, a position is subject to the General Schedule, even if it requires physical work, if its primary duty requires knowledge or experience of an administrative, clerical, scientific, artistic, or technical nature not related to trade, craft, or manual labor work.

The Electronic Equipment Installation and Maintenance Family, 2600, covers jobs involved in the installation, repair, overhaul, fabrication, tuning, alignment, modification, testing, calibration, and inspection of electronic equipment and related devices, where the work requires substantive knowledge of the capabilities, limitations, operations, design characteristics, and functional uses of a variety of types and models of electronic equipment and systems. This basically expresses the primary knowledge requirements of the appellant's job. The major and most critical duties performed by the appellant require comprehensive knowledge of the assigned aircraft electronic systems, and the ability to use this knowledge in interpreting technical orders and other instructions to determine maintenance actions required; evaluating work carried out by electronics technicians for compliance, adequacy of repairs, and proper installation of parts; and conducting

physical inspections of aircraft systems. These are clearly trade as opposed to administrative knowledges.

The Quality Assurance Series, GS-1910, dated March 1993, includes positions the duties of which are to perform, administer, or advise on work concerned with assuring the quality of products acquired and used by the Federal Government. The work of this series involves: (1) the development of plans and programs for achieving and maintaining product quality throughout the item's life cycle; (2) monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements; and (3) analysis and investigation of adverse quality trends or conditions and initiation of corrective action. The duties of positions in the GS-1910 series require analytical ability combined with knowledge and application of quality assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques.

The GS-1910 standard provides further guidance on the distinction between quality assurance work under the General Schedule and inspection work under the Federal Wage System. It specifies that quality assurance specialists use a variety of administrative, analytical, and technical methods and techniques to ensure the quality and reliability of products. Inspection, by physical test or measurement of the product, is only one of the techniques applied by quality assurance specialists. In the context of quality assurance work, tests and measurements at various points in the production cycle: provide objective evidence as to the effectiveness of quality procedures and controls; identify potential problem areas or inherent weaknesses in the product itself, the technical data, materials, or manufacturing processes; and serve as a basis for adjusting surveillance or control over operations. For maintenance and manufacturing quality assurance, the standard lists such major quality functions as:

- Participating with production, engineering, and other activities in developing plans and procedures for assuring quality and reliability of products;
- Reviewing work instructions and technical data to identify characteristics critical to product acceptability, and providing inspection and test procedures;
- Monitoring quality of materials and supplies required to support production activities;
- Conducting audits of products and processes for conformance to specifications and to detect processing and technical documentation deficiencies and recommending corrective action, including establishment of acceptable quality levels and statistical techniques;
- Verifying product quality using sampling inspection or more intensive product inspection techniques;
- Investigating customer complaints and deficiency reports and providing identification of causes to appropriate activities;

- Monitoring programs for controlling the accuracy of test and measuring equipment;
- Evaluating procedures for maintaining control of drawings and technical data;
- Coordinating the disposition of nonconforming material; and
- Analyzing quality data to detect unsatisfactory trends or conditions and weaknesses in the quality system.

For inspection positions, test and measurement of the product serve a far narrower purpose, in that they provide the basis for accepting or rejecting the product, service, or process involved and determining the condition of supplies, equipment, or material as serviceable, repairable, or condemned. The inspector is primarily concerned with determining conformance of the product to drawings and/or technical specifications, reporting defects encountered and their probable causes.

The appellant's job does not fall within the coverage for the GS-1910 series. Our review of his major duties did not confirm his contention that the primary purpose of his job is "to administer various quality assurance programs designed to monitor and maintain the safety, reliability, and quality of assigned aircraft and its support system throughout its life cycle." The appellant works within the context of a local operation responsible for the maintenance of the nine C-141 aircraft stationed at [Air Force base]. There are ten other locations around the country that also provide maintenance services for the C-141's stationed at their respective bases. The overall managing activity for the C-141 is Warner-Robins AFB, Georgia, which establishes the maintenance plans, procedures, and schedules and the technical data pertaining to product acceptability and performance requirements. The appellant's responsibilities are much narrower in scope, i.e., ensuring the safety and technical order compliance for these nine individual aircraft. Although he consults ALC engineers to discuss particular maintenance problems, he does not work in conjunction with them to develop quality plans and procedures, nor does he review technical data for new equipment or components to devise the inspection and test procedures, since these are prescribed by the various engineering activities. In this way, he is not involved in "the development of plans and programs for achieving and maintaining product quality throughout the item's life cycle." Although he is involved in "monitoring operations to prevent the production of defects and to verify adherence to quality plans and requirements," this monitoring is performed exclusively by observing maintenance work in progress and conducting hands-on inspections rather than through more sophisticated methodology such as sampling techniques, statistical analysis, or more intensive inspection techniques. Lastly, he does not have responsibility for "analysis and investigation of adverse trends or conditions and initiation of corrective action." He is required to report deficiencies identified or encountered within the course of his work to the ALC engineering activities by means of the Quality Deficiency Report. However, this being a local operation, he is not responsible for identifying and analyzing overall trends related to maintenance of the C-141, nor for initiating corrective action to reduce the

incidence of problems or deficiencies beyond the repair of the immediate aircraft. Thus, the basic requirements of the GS-1910 series are not met.

The primary knowledge requirements of the GS-1910 series are knowledge and application of quality assurance principles and techniques, and knowledge of pertinent product characteristics and the associated manufacturing processes and techniques. The appellant's job does not require these knowledges. The quality assurance principles and techniques referred to in this context include such methodologies as statistical analysis and sampling techniques, procedures evaluation, process audits, and investigations of defective material. The appellant does not perform any of these techniques. His involvement in quality assurance relates to ensuring that maintenance work performed on the assigned aircraft is properly carried out and that prescribed technical orders are accomplished expeditiously. His focus is on the adequacy and acceptability of the maintenance work itself, not on the effectiveness of the overall maintenance process for the C-141. For example, he does not develop and continuously revise maintenance procedures for new equipment and components installed on the aircraft, or investigate trends and recurrent complaints to identify at what point in the maintenance process additional quality safeguards should be instituted. In this way, the knowledge required of product characteristics and the associated manufacturing processes is more limited than that expected within the context of the GS-1910 series, since the appellant is not involved in determining the type or level of maintenance required for this aircraft.

The appellant contends that his job should be classified to the General Schedule because he regards most of his work as being administrative in nature. Beyond the particular requirements of the GS-1910 series, administrative work is defined in the Classifier's Handbook (dated August 1991) as "work that requires a high order of analytical ability combined with comprehensive knowledge of (1) the functions, processes, theories, and principles of management and (2) the methods used to gather, analyze, and evaluate information." A position is subject to the General Schedule if its primary duty requires knowledge or experience of an administrative nature not related to trade, craft, or manual labor work. The work regarded by the appellant as "administrative" is actually closely related and ancillary to the primary inspection function. It includes the performance of duties that serve the purposes of: determining what work needs to be done (e.g., reviewing technical orders for applicability and ensuring their distribution to the aircraft mechanics); identifying potential problems that may be encountered in the work and relaying this information to the technicians (i.e., administering the unit crosstell program); ensuring that the work is being carried out properly and documenting any deficiencies or deviations (e.g., completing personnel evaluations based on observation of work in progress); resolving problems encountered in the course of the work (e.g., consulting with engineers on equipment problems); and reporting on results of the work. These are not "program administration" duties but rather duties that are directly tied to, and further the accomplishment of, the basic inspection function, with the purpose of ensuring proper maintenance of the assigned aircraft.

Decision

The appellant believes that his job has changed substantially in the past few years. These changes relate primarily to the aging of the aircraft, which necessitates more frequent contacts with the engineering activities on increased maintenance and retrofitting requirements, and the additional requirement for conducting personnel evaluations. However, as addressed above, these duties are extensions of the job's primary inspection function and do not in themselves alter the basic character of the job. As such, the appellant's job is properly assigned to the Federal Wage System.