

**Job Grading Appeal Decision**  
**Under section 5346 of title 5, United States Code**

**Appellant:** [appellant]

**Agency classification:** Aircraft Engine Mechanic  
WG-8602-10

**Organization:** Propulsion Element  
Maintenance Squadron/Group  
[#] Fighter Wing  
[city/state] Air National Guard  
[city and state]

**OPM decision:** Aircraft Engine Mechanic  
WG-8602-10

**OPM decision number:** C-8602-10-02

/s/ Jeffrey E. Sumberg

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Jeffrey E. Sumberg  
Deputy Associate Director  
Center for Merit System Accountability

January 4, 2008

Date

As provided in section S7-8 of the *Operating Manual: Federal Wage System (FWS)*, 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 section 532.705(f) of title 5, Code of Federal Regulations (CFR). Please address your request for review to the appropriate OPM office, as provided in the *Introduction to the Position Classification Standards*, appendix 4, section H.

**Decision sent to:**

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## **Introduction**

On September 30, 2005, the Chicago Oversight and Accountability Group (formerly the Chicago Field Services Group) of the U.S. Office of Personnel Management (OPM) accepted a group job grading appeal from Messrs. [appellants]. They currently occupy identical additional jobs, hereinafter referred to as job, graded as Aircraft Engine Mechanic, WG-8602-10. The job is located in the Propulsion Element, Maintenance Squadron/Group, [#] Fighter Wing, [city/state] Air National Guard (ANG), in [city/state]. The appellants originally asked that their job be graded as Aircraft Engine Mechanic, WG-8602, “above the grade 11 level,” but subsequently asked to change their appeal to grading as Aircraft Engine Mechanical Inspector, WG-8602-12. [one appellant] was designated as lead appellant. We received the initial agency administrative report (AAR) on October 24, 2005, but due to the deployment of an appellant, the change in the basis of the appeal focusing on the inspection duties, the complete AAR was not received until April 13, 2007. The appeal was further delayed in order to clarify the agency reasons for not effecting the Civilian Personnel Management Service (CPMS) decision resulting in the position title to Aircraft Engine Mechanical Inspector. We accepted and decided this appeal under section 5346 of title 5, United States Code (U.S.C.).

## **Background**

On January 25, 2005, the appellants filed a job grading appeal with the Department of Defense (DoD) CPMS requesting an upgrade to Aircraft Engine Mechanic, WG-8602-12. CPMS determined, based on a formal desk audit, that most of the appellants’ time (approximately 70 percent) is spent performing aircraft engine mechanic work and 30 percent is spent inspecting aircraft engine mechanic work. The July 27, 2005, CPMS decision applying both the Job Grading Standard (JGS) for Aircraft Engine Mechanic, 8602, and the Federal Wage System (FWS) JGS for Inspectors, resulted in a change in title to Aircraft Engine Mechanical Inspector, but left the allocation and grade unchanged as WG-8602-10. While the CPMS decision resulted in a job-grading action to change the title of the appealed job, the National Guard Bureau (NGB) did not execute this change, asking to hold any required action pending a final decision by OPM. Therefore, for purposes of this appeal, we will find the official job grading remains Aircraft Engine Mechanic, WG-8602-10. NGB’s rationale delineating its disagreement with CPMS’s application of the FWS JGS for Inspectors was submitted with the AAR.

## **General issues**

The appellants asked us to make an on-site visit to conduct a desk audit of their position. There is no right to a hearing or audit in the classification appeal process. The agency and appellants have a full opportunity to send OPM any information pertinent to the appeal. OPM typically conducts a desk audit when we determine development of facts sufficient to allow us to make a sound classification decision requires an on-site desk audit. In this case, we found the record furnished sufficient information, when augmented by a telephone audit and supervisory interviews, to clarify the major duties assigned to and performed by the appellants.

The appellants are officially assigned to job description (JD) #[#####]. The appellants and supervisors certified to the accuracy of the JD, but the appellants believe that the “Inspector”

duties and responsibilities they perform, as mandated in written Technical Orders, have not been evaluated properly. They further:

...believe the inspector work accomplished on aircraft engines exceed (sic) the Grade 11 Example job descriptions Nos. 7 (Automotive Equipment Repair Inspector, 5823, Grade 11) and 8 (Sheet Metal Repair Inspector (Aircraft), 3806, Grade 11) used in the OPM JFS JGS for Inspectors.”

The appellants also say they deserve more credit for six duties they perform which they believe the 8602 JGS fails to properly credit, and they also think the 8602 JGS is outdated and does not give sufficient weight to their work on aircraft engines. However, the content of standards established for this job is not appealable (5 CFR 532.701). We will address the six duties at issue in our grade-level analysis of the work they perform.

The appellants also make various other statements about their agency and its evaluation of their inspector responsibilities. By law, our job grading decisions must be based solely upon a comparison between the actual duties and responsibilities of the job and the appropriate JGSs (5 U.S.C. 5346). This precludes the job-to-job comparison requested by the appellants in their appeal since there is no assurance the cited jobs are graded properly. In addition, because our decision sets aside all previous agency decisions, the appellants' concerns regarding their agency's job grading review process are not germane to this decision. In adjudicating this appeal, our responsibility is to make our own independent decision based on the proper grading of this position.

A JD is the official record of the major duties and responsibilities assigned to a job by an official with the authority to assign work. A job is the duties and responsibilities that make up the work performed by an employee. Appeal regulations permit OPM to investigate or audit a job and decide an appeal on the basis of the actual duties and responsibilities currently assigned by management and performed by the employee. An OPM appeal decision grades a real operating job and not simply the JD. Therefore, this decision is based on the work currently assigned to and performed by the appellants.

### **Job information**

The appellants report directly to the Chief, Propulsion Section (locally called the Propulsion Element), which is headed by an Aircraft Engine Mechanic Supervisor, WS-8602-10. The mission of the Propulsion Section, which is part of the 114<sup>th</sup> Maintenance Squadron, is to provide the highest quality combat ready aircraft, munitions, and equipment supported by highly trained personnel, enabling the [#]<sup>th</sup> Fighter Squadron to aggressively train in peacetime and deploy at any time to a location to suppress and destroy enemy resources upon wartime tasking.

The Propulsion Element is responsible for the repair, maintenance, and certification of assigned jet aircraft engines. This work is generally performed in three areas: the Jet Engine Intermediate Maintenance (JEIM) shop which certifies, repairs, and performs sequential disassembly; the Hush House shop which troubleshoots malfunctioning engines and interrelated propulsion system components, and the Flight Line which handles troubleshooting, removal, and

replacement of aircraft engines and components. The two shops are lead by subordinate Aircraft Engine Mechanic Supervisors, WS-8602-9. The Propulsion Element Chief assigns mechanics from both shops to perform work on the flightline, as needed.

The appellants perform maintenance, repair, and inspection work on General Electric (GE) F110 jet engines for F-16 aircraft. They troubleshoot malfunctioning engines and interrelated propulsion system components, determine degree of disassembly or certification required, repair or replace defective components, diagnostic computer, and associated hardware. This includes troubleshooting, modifying, repairing, and performing sequential disassembly and assembly of gearboxes and auxiliary power units.

They analyze malfunctions using schematics and wiring diagrams, blueprints, manufacturer's specifications, computer diagnostics data, inspection findings, trending data, and aircrew debriefs. They perform engine run operation on installed and uninstalled engines to troubleshoot malfunctions or verify findings. They interpret engine management trend data and investigate trend anomalies to eliminate catastrophic engine failure or damage by the prediction and detection of adverse trends toward known failure modes and recommend action to correct deficiencies based on the analysis of the data and the correlation of defects before they occur.

Major maintenance involves complete teardown and overhaul of the entire engine. They perform evaluations that must be accomplished at critical points in the repair/build-up process using a variety of quality characteristics, consisting of complete systems or components and assemblies that undergo many steps in a repair process and have highly critical tolerances. They perform test cell operation of engines and aircraft run-ups, make final adjustments, and verify that the engines are operating within acceptable parameters. The appellants perform scheduled and special evaluations on installed engines, auxiliary power units, and associated airframe-mounted systems.

The appellants perform command-directed and locally-established in-progress inspections (IPIs) certifying acceptable performance of all conventional or modified aircraft engines prior to their being installed in the aircraft or placed in inventory. They make final certification of completed work and critical engine build measurements, annotating by signature that work and tolerances are correct. They certify that an aircraft is safe for flight by Clearing Red X and other Red symbols. (A Red X indicates that the aircraft or equipment is considered unsafe or unserviceable and will not be flown (per AF regulations) until the unsatisfactory condition is corrected and the symbol is cleared). There are 30 procedural and 22 dimensional checks accomplished during JEIM on the GE F110 engine.

The appellants also provide on-the-job training to other personnel. These may be lower-graded employees in the immediate work unit or journeymen in other shops that need to become familiar with various aspects of aircraft engine maintenance.

In reaching our job grading decision, we have carefully reviewed and considered all information of record furnished by the appellant and his agency. To help decide the appeal, we also conducted telephone interviews with the appellant on December 29, 2006, and his immediate supervisor on January 9, 2007, and talked with their second-line supervisor on April 12, 2007.

### **Pay plan 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 (GS) 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 and only FWS JGSs may be applied for grading purposes.

The appellants say their duties compare with two GS position classification standards (PCSs): Quality Assurance, GS-1910, and Management Analysis, GS-343. They believe their work closely matches the criteria for classifying white-collar positions (such as Quality Assurance and Management Analyst) and say they are fundamentally different from the criteria for classifying jobs in blue-collar occupations (such as Aircraft Engine Mechanic).

However, the primary purpose of the appellants' job is to certify acceptable performance, test, repair, troubleshoot, and to operationally check and modify aircraft turbine and auxiliary power units and associated propulsion system components. The appellants must have knowledge of the operation, installation, adjustment, and inspection of a variety of major aircraft engine systems, subsystems, and assemblies. This is considered trades knowledge. Since the paramount requirement for the appellants' primary duties is trades knowledge, the work is exempt from the GS and is assigned to the FWS. Therefore, reference to and/or application of the GS PCSs cited by the appellants is prohibited by the FWS job grading process.

### **Occupational code, title, and standard determination**

NGB graded the appellants' job as Aircraft Engine Mechanic, WG-8602-10, but CPMS upon appeal graded the job as Aircraft Engine Mechanical Inspector, WG-8602. CPMS determined the appellants' IPIs of maintenance and repair work were inspection functions, finding this work occupied 30 percent of the appellant's time and constituting a major duty, and, therefore, met the definition of work covered by the FWS JGS for Inspectors. CPMS re-titled the appellants' job as Aircraft Engine Mechanical Inspector.

However, the NGB AAR disagrees with the titling of the position by CPMS and points out that the functional JGS for Inspectors does not cover work that involves troubleshooting, final alignment, trouble analysis, and calibration of equipment and systems such as described here and performed by the appellants. Instead, NGB states the purpose of the IPIs as performed by the appellants is to certify acceptable performance of engines. NGB says the appellants independently determine the type and extent of repairs needed and complete repairs with

occasional spot checks **during progress**. NGB maintains these inspections are covered in the 8602 JGS which under Factor 2 describes the grade 10 aircraft engine mechanic as responsible for “repairing, troubleshooting, testing and certifying acceptable performance of all conventional or modified aircraft engines prior to their being installed in the aircraft or placed in inventory.” NGB’s position is that the inspector “duties” are no more than an extension of the troubleshooting work done by the appellants as part of their primary and paramount maintenance and repair work.

All aspects of the job grading criteria must be fully met for jobs to be evaluated under the FWS JGS for Inspectors. Appropriate application of the JGS requires full and careful analysis of all relevant factors. The JGS for Inspectors indicates it is generally used to grade nonsupervisory jobs that involve examining services, materials, and products that are processed, manufactured, or repaired by workers performing trade or craft work to determine that the physical and operating characteristics are within acceptable standards, specifications, or contractual requirements.

Under a formal inspection program, FWS inspectors typically perform several different categories of inspections. For task evaluations, they observe a mechanic performing a job, determine if it is performed in accordance appropriate directives and technical orders, and then grade the mechanic. In quality verification inspections, they evaluate maintenance procedures, processes, or products to determine if they are being accomplished in accordance with standards, codes, technical orders, work specifications, drawings, and work control documents. Inspectors also perform a variety of core and other inspections that may involve such things as work control documents, safety practices, maintenance of a clean work area, and maintenance and control of tools and equipment. They use checklists, rating instructions, technical data, and other guidelines in performing these inspections.

The appellants’ reliance on Example Job Descriptions Nos. 7 and 8 in the JGS for Inspectors is misplaced, as IPIs are but one part of the total inspection process assigned to and performed by a job’s incumbent. Published OPM interpretive guidance (OPM’s Digest of Significant Classification Decisions and Opinions, No. 07-06) indicates “the inspection work covered by the JGS for Inspectors always involves comparison of work that has been partially or completely finished in accordance with standards, specifications, or contractual requirements.” In contrast, inspections performed by the appellants are governed by Air Force Instruction 21-101 which defines IPIs as “an additional inspection or verification step at a critical point in the installation, assembly, or reassembly of a system, subsystem, or component in accordance with technical orders.” Rather than part of a total inspection process, the appellant’s IPI is an extension of the “inspection” work typical of the testing and troubleshooting performed by mechanics and workers in the trade. In essence, the appellants conduct peer reviews of each others’ work as part of the repair process. Each mechanic must be certified to sign off on the completion of the maintenance process. They must pass a test administered by the Quality Assurance Office to be certified. The mechanic who did the work signs the “corrected by” line of the certification sheet. The other mechanic checks that each and every step in the maintenance process as required by the technical order has been completed by their colleague and then signs the certification sheet on the “inspected by” line.



The authorities assigned to the supervisor and work leader further support the exclusion of the appellants' inspectional work from coverage by the JGS for Inspectors. The supervisor's JD (#####) states the supervisor reviews work in progress or on completion and makes adjustments to the work as necessary. The work leader's JD (#####) states the work leader checks work in progress and/or upon completion for compliance with the supervisor's instructions, appropriate technical orders, etc. Therefore, unlike work covered by the JGS for Inspectors, the appellants' work is subject to final organizational "inspection" after the interim peer "inspection" they perform.

"Certification" work has no inherent grade level impact. As discussed in the *Introduction to the Federal Wage System*, a requirement that employees be licensed or certified to perform work (e.g., FAA Certification), or that they certify with their signatures that standards of quality and safety have been met in performing work, does not in itself affect the grade level of a job. In a note to users, the 8602 JGS also mentions that aircraft engine mechanics are also experiencing a corresponding increase in the use of computerized testing and on-board diagnostic equipment and/or systems in the maintenance, troubleshooting, repair, and overhaul of engines. The application of this equipment and/or systems by individuals in this series also has no direct grade level impact. Unlike the formalized inspection function covered by the JGS for Inspectors, the Propulsion Element has not been delegated any formal inspection function. Since the appellants' "inspection" is not covered by the JGS for Inspectors it precludes use of that JGS for titling or grade evaluation purposes. In such cases, the JGS for Inspectors indicates the inspectional work is to be evaluated by applying the JGS for the appropriate occupation. The 8602 JGS, therefore, must be used for grading and titling purposes. The title for jobs at grade 10 and above is *Aircraft Engine Mechanic*. Based on the analysis which follows, the job is properly allocated as Aircraft Engine Mechanic, WG-8602.

### **Grade determination**

The 8602 JGS is written in narrative format and describes work at grades 8, 9, and 10. Grades 9 and 10 describe separate journey levels of work within this occupation. The JGS does not describe all possible levels at which jobs might be established. Jobs that differ substantially from the level of skill, knowledge, and other work requirements described in the JGS may be graded above or below these grades based on applying sound job grading principles.

A job is graded as a whole against the level of demands found at differing grades. These demands are expressed in the job grading standard as four factors: Skill and Knowledge, Responsibility, Physical Effort, and Working Conditions. No single factor is considered by itself, but only in relation to its impact on the other factors. The job is classified to the grade that best represents the overall demands of the work.

*Factor 1, Skill and Knowledge:*

This factor covers the nature and level of skill, knowledge, and mental application required to perform the work.

The appellants believe the level of responsibility, skill and knowledge, criticality and complexity of the maintenance accomplished by the GE F110 Aircraft Engine Mechanic significantly exceeds the WG-10 grade. They say their responsibilities concerning Certifying Red X and other red symbols are a daily requirement and believe the certifying of aircraft/engine safety of flight issues by clearing Red Xs and other red symbols is not identified or correctly credited in the 8602 JGS. The appellants' concern in this regard is misplaced. All occupations change over time, some more rapidly and profoundly than others with regard to the technology and/or specific processes performed in accomplishing the work. However, the fundamental duty and responsibility patterns and qualifications required in an occupation normally remain stable. Any of the appellants' duties not specifically referenced in the JGS can be evaluated properly by comparison with similar or related duties that the JGS does describe as well as with the entire pattern of grade-level characteristics. Therefore, careful application of the appropriate standard to the work the appellants perform will yield the correct grade for their job.

At the grade 10 level, aircraft engine mechanics have skill and thorough knowledge in installing, removing, operating, and repairing a variety of conventional and modified aircraft engines and accessory systems in order to troubleshoot, maintain, repair, and/or test different types of engines in aircraft test cells, maintenance shops, and on the flight line. They have thorough knowledge of repair methods, degrees of disassembly necessary, and the extent of rework required before reassembly. They apply this skill and knowledge in: (1) identifying and selecting alternative methods and trade techniques to adapt accepted repair procedures to new or unfamiliar engine or accessory systems, to anticipate what tools and parts will be required, and to set up the work area; (2) repairing and reworking engine parts and components; reassembling accessories such as portions of electrical, pneumatic, and hydraulic systems; and trimming units to maximum operating capability (e.g., they analyze such problems as fuel fluctuation, compressor instability, or excessive vibration and take corrective action, disassembling to the extent necessary to make needed repairs and adjustments.); (3) using standard and precision measuring instruments such as vibration analyzers to detect and locate the source of vibration in propellers, reduction gears, or engine rotors; (4) operating diagnostic and on-board electronic equipment and systems to aid in identifying aircraft related problems that may affect engine operation; (5) adapting emerging technology developed within the field and utilizing new tools, test devices, and equipment associated with the trade, such as digital diagnostic equipment, on-board electronic equipment and systems, engine analysis software, specialized measuring devices, and automated storage and retrieval of in-flight and historical performance data; and (6) using pyrometers to check engine combustion and test benches that read multiple parameters in oil, air vacuum, and torque.

Grade 10 aircraft engine mechanics also apply this level of knowledge and skill in: (1) retrieving and correlating engine and aircraft digital diagnostic data to observed or reported discrepancies; (2) using engine analysis software to evaluate engine performance parameters and troubleshoot engine/aircraft malfunctions; (3) making initial diagnosis and selecting appropriate tools to disassemble the engine or accessory systems; (4) using test equipment to locate and determine

the cause of the defect, such as possible material failure, foreign objects, or incorrect assembly, and determine the repairs needed; (5) selecting appropriate troubleshooting techniques to identify engine malfunctions, including skill in interpreting crew reports and pilot reported discrepancies; and (6) using and interpreting technical orders, manufacturer catalogs, maintenance bulletins, complex multi-view blueprints, schematic drawings, etc., to obtain the technical information needed to troubleshoot, assemble and trim engines (e.g., using technical orders and specifications to determine the sequence and tolerances for adjusting variable stator systems or determining tolerances of turbine bearing parts when troubleshooting a vibration problem).

The functions cited by the appellants in support of a higher grade require applying grade 10 knowledge and skill. As at the grade 10 level, clearing of red-X documentation on engines and related components is the end process of grade 10 level troubleshooting, maintenance, repair, and testing work the appellants perform on complete aircraft engines and components. Like the grade 10 level, evaluation and certification is based on the application of technical orders. Certification has no grade-level impact in that it is based on applying the same level of knowledge and skill as performing the work. Similarly, interpreting engine trend data is comparable to operating on-board electronic equipment and systems to aid in identifying aircraft related problems that may affect engine operations described at the grade 10 level in the JGS. Just as at the grade 10 level, the appellants must apply the skill and knowledge required to identify and select alternative methods and trade techniques to new or unfamiliar engine or accessory systems. As addressed in the JGS, the appellants' perform "engine run ups and inspection that may involve performing aircraft full-power runs to complete engine efficiency checks."

The appellants work clearly falls short of the JGS's description of work properly evaluated above the grade 10 level: "Evaluate aircraft engine mechanic work that meets and substantially exceeds the criteria described at this level at the next higher grade. This work includes: (1) aircraft engines that have not been fielded; (2) prototype engines; (3) extensively modified production aircraft engines that are dedicated to support research, testing, development, and evaluation of engines and aircraft; and/or (4) in-service testing of potential engine replacement items." Therefore, we credit this factor at the grade 10 level.

## Factor 2, Responsibility

This factor covers the nature and degree of responsibility involved in the work, given its complexity and scope, the difficulty and frequency of judgments and decisions made, the supervisory control involved, and the work instructions and technical guides used.

At the grade 10 level, mechanics are responsible for repairing, troubleshooting, testing, and certifying acceptable performance of all conventional or modified aircraft engines prior to being installed in the aircraft or placed in inventory. They are assigned work by their supervisors either orally or by work orders. They independently determine the type and extent of repairs needed, work sequence, and the parts, tools, and materials necessary to accomplish the repair with occasional spot checks during progress. Aircraft engine mechanics independently determine the type and extent of repairs needed, work sequence, and the parts, tools, and materials necessary to accomplish the repair with occasional spot checks during progress. They

refer to operation logs, aircraft digital diagnostic data, trouble reports, and technical manuals when locating and correcting defects. They follow clearance and adjustment specifications found in technical manuals, blueprints, schematics, and engineering change orders. Grade 10 mechanics provide on-the-job training to lower-graded repairers on aircraft engine repair practices and procedures, technical aspects of new/modified engines and components, and instruct them on safety procedures. The supervisor insures that overall work meets accepted trade standards and provides assistance on unusual problems when requested.

As at the grade 10 level, the appellants work independently under general supervision. They are expected to plan work sequences, select tool and repair parts, and otherwise carry assignments through to completion. Typical of the grade 10 level, they are responsible for accomplishing their troubleshooting, maintenance, and repair work by using the reports, technical manuals, schematics, and other documentation used at that grade level. The appellants ensure that proper tools and repair parts are selected. As at the grade 10 level, their work is subject to spot check upon completion for acceptability and adherence to instruction and established standards. The supervisor ensures that overall work meets accepted trade standards and provides assistance on unusual problems when requested. The appellants say they provide on-the-job training to lower-graded personnel, or newly assigned personnel regardless of grade, on proper certification techniques on installed engine components and instruction in repair and inspection techniques of aircraft engine components and related equipment. This work is directly addressed at the grade 10 level in the JGS. We note the organizational chart reflects that there are currently no lower graded workers assigned to any of the Propulsion element shops. The group appeal includes all ten WG-10 non-supervisory aircraft engine mechanics assigned to the Propulsion Element. Therefore, we credit this factor at the grade 10 level.

*Factors 3, Physical effort, and Factor 4, Working conditions,* are the same at all grade levels in the JGS. Therefore, they have no grade level impact and will not be addressed further.

## **Decision**

The appellants' job is properly graded as Aircraft Engine Mechanic, WG-8602-10.