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

San Francisco Field Services Group
120 Howard Street, Room 760
San Francisco, CA 94105-0001

Classification Appeal Decision
Under section 5112 of title 5, United States Code

Appellant:	[Name of appellant]
Agency classification:	Airplane Pilot GS-2181-12
Organization:	[Appellant's organization/location] U.S. Forest Service U.S. Department of Agriculture
OPM decision:	Airplane Pilot GS-2181-12
OPM decision number:	C-2181-12-02

/s/ Robert D. Hendler

Robert D. Hendler
Classification and Pay Claims
Program Manager

December 12, 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 positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the *Introduction to the Position Classification Standards*, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[Appellant's name and address]

[Address of appellant's regional human resources office]
U.S. Forest Service
U.S. Department of Agriculture

[Address of appellant's local human resources office]
U.S. Forest Service
U.S. Department of Agriculture

Director, Human Resources Management
U.S. Forest Service
Rosslyn Plaza
1621 N. Kent Street, Room 900
Arlington, VA 22209

Director of Human Resources Management
USDA-OHRM-PPPD
U.S. Department of Agriculture
J.L. Whitten Building, Room 302-W
1400 Independence Avenue, SW
Washington, DC 20250

Introduction

On August 1, 2005, the San Francisco Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [name of appellant]. On September 21, 2005, we received the agency's complete administrative report. The appellant's position is classified as Airplane Pilot, GS-2181-12, but he believes that it should be upgraded to GS-13. The appellant works at the [name of appellant's organization/location], U.S. Forest Service, U.S. Department of Agriculture. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

This appeal decision is based on a careful review of all information furnished by the appellant and his agency. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and his supervisor.

General issues

The appellant believes that on a previous appeal OPM found smokejumper pilot duties to be at the GS-13 level, therefore his position should be at that level. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, or to those covered by previous appeal decisions which are specific to the particular position appealed, as a basis for deciding his appeal. Therefore, we have considered the appellant's statements only insofar as they are relevant to making that comparison.

Position information

Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD) [number]. The PD of record is general in nature and all non-supervisory GS-12 smokejumper pilots within the appellant's unit are assigned to identical additional positions. According to the PD, he operates a variety of Forest Service owned and leased fixed-wing aircraft, and completes a wide scope of flight missions. The position is considered a primary firefighting position under the Firefighter Retirement Act. The PD indicates that the appellant spends 80 percent of his time functioning as pilot-in-command or copilot of both light and heavy multi-engine airplanes during wildfire suppression activities. He drops smokejumpers and their firefighting equipment by parachute, and transports suppression crews and other personnel throughout the United States. On certain occasions, the appellant flies aircrafts at low-levels over rugged, mountainous terrain under marginal visual conditions. He lands and takes off from marginal backcountry airstrips in remote areas, and operates aircraft under day, night, visual and instrument conditions.

Other duties include functioning as pilot-in-command of light and heavy multi-engine and single engine airplanes performing administrative transport of personnel and cargo (5 percent); inspecting contracted aircraft for airworthiness and contract requirements, and determining

contract pilot qualifications (5 percent); and performing in-service flight check rides and evaluating training and progress of GS-9 through GS-12 airplane pilots (5 percent). As part of the first duty noted above, the appellant also instructs and coordinates a variety of aviation training programs, under both operational and occasional classroom conditions. He has taught a specific section on smoke jumping to those enrolled in such a training course, but does not regularly conduct formal classroom training.

The results of our interviews and other material of record provide more information about the appellant's duties and responsibilities, and how they are performed. In addition, we incorporate the appellant's PD by reference into this decision.

Series, title, and standard determination

The appellant's agency has classified his position in the Aircraft Operation Series, GS-2181, titling it Airplane Pilot, and the appellant does not disagree. We concur with the agency's determination of title and series. The position classification standard (PCS) for the GS-2181 series contains appropriate grading criteria which are applied below to the appellant's position.

Grade determination

The PCS for the GS-2181 series uses three interrelated factors to measure the knowledge and skills used in the aircraft operation occupation: (1) Aircraft Operated, (2) Nature and Purpose of Assignments, and (3) Degree of Hazard. No one factor is considered grade controlling, and at the higher grade levels they are addressed within the context of flight instruction assignments and flying assignments.

At the GS-12 level, pilots and/or flight instructors apply the knowledge and skills to instruct or evaluate students or rated pilots in flight techniques required to fly tactical operations in light single-or twin engine airplanes; fly light single-or twin engine airplanes or helicopters at low altitudes and speeds over unfavorable terrain with responsibility for making patrols and operating from confined or isolated areas; fly heavy multi-engine transport airplanes to various destinations, using instrument flight rules, to transport supplies and equipment; fly a variety of light twin-engine airplanes or helicopters to a variety of locations, some of which are unfamiliar, to transport passengers, during day or night using instrument flying techniques in generally favorable weather; or conduct functional flight checks of light airplanes or helicopters following repair, maintenance, or the installation of approved modifications to aircraft systems.

At the GS-12 level, flying assignments involve operating light single- or twin-engine airplanes at minimum controllable speeds or at low altitudes, or both, over unfavorable terrain. Assignments often involve making flights over uncharted courses and using meadows or roads for landing strips. These assignments are distinguished from the GS-11 level by the greater degree of skills and judgment required to fly at low altitudes over unfavorable terrain. An additional factor of difficulty is that the pilots must direct their attention outside the aircraft for sustained periods of time. Moreover, at low altitudes there is little chance to maneuver to a favorable landing site in the event of trouble. Such assignments are characterized by a substantial degree of hazard due to the flight regimen of the aircraft, the environment, and the demands on the pilot. Assignments at

the GS-12 level also include flying heavy multiengine transport aircraft to transport personnel, supplies and equipment to a variety of points throughout the continental United States. Flights may involve a pattern of routes and destinations, and vary according to the demands of the assignment. Typically, the flights are made day and night in generally favorable weather and require considerable skill in instrument techniques. Assignments at the GS-12 level differ from the next lower level in terms of the requirement for extended flights and the aircraft involved. Flying assignments of this type are characterized by a minimum degree of hazard.

At the GS-12 level, flight instruction assignments for light single- or twin-engine airplanes involve training or evaluating students in the advanced techniques required, for example, in short-field takeoffs and landings under maximum loads, flying in formation, performing evasive maneuvers, and aerobatics. Students are taught the procedures to use in emergencies such as engine failures and malfunctions of hydraulic and electrical systems over rough terrain, e.g., hills and forests both day and night. Assignments at this level include responsibility for reviewing students' basic training and determining their ability to progress to further advanced courses; determining through evaluation if students should continue or be eliminated; and recommending additional training for students whose progress is unsatisfactory. Assignments at this level are distinguished from those at the GS-11 grade level primarily in that very advanced techniques are taught at this level. As stipulated in the PCS, responsibility for also training or evaluating students in the basics of instrument flight; i.e., training pilots to takeoff, fly straight and level, execute turns, climb, descend, and recover from unusual altitudes, and fly prescribed patterns using basic flight instruments controlling attitude, altitude, speed, and direction, will not remove a position from the GS-12 grade level. Such assignments entail a substantial degree of hazard.

Assignment characteristics at the GS-13 level involve application of the knowledge and skills required: to instruct or evaluate student pilots in advanced instrument flight techniques; to fly heavy twin-engine or multiengine aircraft equipped with electronic devices used to inspect air navigational facilities, and to evaluate the safety and practicability of terminal and en-route flight procedures; to fly heavy multiengine airplanes on extended flights, with responsibility for transporting passengers and/or cargo to and from a wide variety of domestic or foreign points; and to test aircraft with substantially modified systems.

Flying assignments at the GS-13 level involve flying heavy multiengine airplanes (including those classed as “jumbos”) over very long distances to a wide variety of locations in this country and overseas for the purpose of transporting cargo and/or personnel. Flights typically involve distances that are significantly greater than those for similar assignments at the GS-12 level, except that overseas flights require that the pilot be familiar with international flight procedures and terminology, and the air traffic control procedures applicable in foreign countries. Since such flights typically involve extended over-water flying, they are characterized by a marked degree of hazard. These assignments are distinguished from similar work at the GS-12 level primarily by the weight of aircraft flown and by the variety of different areas and destinations to which flights are made. Other assignments at this level involve the operation of high performance jet aircraft in law enforcement work under substantially hazardous conditions. Assignments include operation of aircraft equipped with sensor and radar equipment to intercept aircraft suspected of being involved in smuggling activities, performing surveillance or shadowing of suspect aircraft to obtain their identification, and tracking the aircraft to the point

of landing. Assignments are characterized by a substantial degree of hazard due to such factors as high-speed intercept operations, flying in extremely close formation to suspect aircraft, prolonged periods of flying, and operating at night without lights and in all weather conditions.

The PCS provides three illustrations for flight instruction assignments at the GS-13 level: (1) a flight instructor who trains and evaluates student or rated pilots in the advanced techniques and procedures for flying fixed and rotary wing aircraft using instruments. Advanced instrument techniques include training in instrument flight planning, precision handling and maneuvering of the aircraft, instrument flight using aircraft navigational instruments and systems (e.g., radio directing and position finding systems) in conjunction with air navigational aids (e.g., omni directional radio ranges), area navigation, air traffic control operations and procedures and pilot interface with those activities, instrument approach and departure procedures, holding procedures, and use of instrument landing systems; (2) providing refresher and mission related training to pilots in the reserves flight-training programs on aircraft ranging from high performance jet fighters to heavy multiengine transport airplanes; assignments cover both ground instruction and in-flight training and evaluation; they train pilots to fly the full range of aircraft maneuvers or capabilities necessary to accomplish the unit's flying mission including combat mission related training for fighter pilots requiring extensive aerobatic maneuvers, close formation flying, high-speed low-level flight, aerial refueling, two or more ship aggressor and defensive combat, and practice over gunnery ranges with heavy ordnance; assignments may involve a minimum degree of hazard but as the instruction progresses more difficult maneuvers occur (e.g., low-level high-speed gunnery practice or high-gravity combat maneuvers) and the hazard increases to a substantial degree; and (3) training and evaluating rated pilots in methods of instruction including monitoring classroom instruction to evaluate other instructors' techniques and procedures, checking instructors' grade books to train them in correct grade book procedures, formulating lesson plans and instructional material used in classrooms, and revising methods of instruction and other training procedures in use. Instruction in flight test techniques is for flight-testing characteristic of the GS-13 level or lower levels. Flight test instruction involves a substantial degree of hazard.

The appellant's position meets the GS-12 level. Like that level, he applies the knowledge and skill to fly a light, twin-turbine engine airplane (DeHavilland Twin Otter) at low altitudes and speeds over unfavorable terrain (e.g., steep, mountainous, wilderness forested areas) to a variety of unfamiliar locations near forest fires for the purpose of selecting drop zones (spotting) for smokejumpers and their equipment. When necessary, he is able to land this aircraft on rough, unimproved landing areas. Similar to the GS-12 level, he also flies a heavy, multi-turbine engine transport airplane (DC-3) to various destinations, at times using instrument flight rules, to transport and drop smokejumpers with their supplies and equipment near fire sites, and moves passengers and equipment to other locations in the country. In flying both aircraft, flights include both day and night flying, generally in favorable weather conditions. In pursuing fires, the appellant flies the airplanes over uncharted, remote courses, often at low altitudes over rough terrain requiring him to direct his attention outside the aircraft for sustained periods of time. The low altitude, nature of the terrain, wind turbulence and dense smoke, and lack of maneuverability, result in a substantial degree of hazard placing significant demands on the appellant to safely fly in and out of the areas.

Although the primary purpose of the appellant's position is to perform flying assignments, he also performs some flight instructor assignments which are similar to but would not exceed the GS-12 level. Similar to that level, using the twin-turbine engine aircraft (Twin Otter), under operational (in-flight) rather than classroom conditions he trains lower graded pilots in advanced techniques such as short-field landings and takeoffs (carrying maximum loads) with limited visibility over rugged surfaces in confined geographic areas, and how to deal with emergency mechanical failures occurring day or night when flying over hills, mountains, and forests, under frequently hazardous conditions. He also trains new pilots in applying basic instrument flight procedures in the kinds of terrain and under the hazardous conditions previously described, as well as maneuvering in confined areas at low speeds and altitudes. He trains in some of the same procedures using the DC-3 aircraft.

The appellant's position does not meet the GS-13 level. Unlike that level, he does not operate the kinds of aircraft indicated under the conditions, distances, and destinations specified at that level. He does not fly heavy twin-engine or multiengine aircraft equipped with electronic devices used to inspect air navigational facilities, and evaluate the safety of terminal and en-route flight procedures, or fly such aircraft on extended flights, transporting passengers and/or cargo from a wide variety of domestic or foreign points. He is not tasked with testing aircraft with substantially modified systems.

The appellant believes that like the GS-13 level, he instructs and evaluates students in advanced instrument flight techniques. While he provides some instruction as discussed at the GS-12 level, he does not train in the breadth of navigational instrumentation and systems as described at the GS-13 level. Unlike the GS-13 level, he does not provide refresher and mission related training to pilots in the reserves flight-training programs, or train and evaluate rated pilots in methods of instruction.

Decision

The appellant's position is properly classified as Airplane Pilot, GS-2181-12.