

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

Dallas Field Services Group
Plaza of the Americas, North Tower
700 North Pearl Street, Suite 525
Dallas, TX 75201

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

Appellant: [appellant]

Agency classification: Telecommunications Mechanic
WG-2502-11

Organization: Telephone Maintenance
[number] Air Base Wing
Communications Squadron
U. S. Air Force Space Command
Department of Defense
[location]

OPM decision: Federal Wage System

OPM decision number: C-2502-00-01

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 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:

PERSONAL

[names of 3 appellants]

(copy sent to individual appellants)

[appellants' address]

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Introduction

On October 21, 2004, the Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a pay category appeal from Messrs. [three appellants]. A fourth appellant, [name], retired after the appeal was submitted to OPM. The appellants are employed as Telecommunications Mechanics, WG-2502-11, in Telephone Maintenance, [number] Space Wing Communications Squadron, U.S. Air Force Space Command, at [name] Air Force Base, [state]. The appellants believe the work they do should be classified to the Information Technology Management Series, GS-2210, at the GS-11 grade level. We received the complete agency administrative report on December 10, 2004. We accepted and decided this appeal under section 5103 of title 5, United States Code.

Background

The appellants are officially assigned to Core Personnel Document (CPD) Number [number]. The Air Force Personnel Center (AFPC) in San Antonio, Texas, audited the job in July 2003, at the request of the appellants' supervisor. That request included a proposed GS-2210-11, CPD. The proposed description is identical to Number [number] with respect to the duties performed. The differences between the two documents are in the percentages of time each duty is performed and the recruitment knowledge, skills, and abilities that are required to perform the job. The AFPC, and subsequently, the Department of Defense Civilian Personnel Management Service (CPMS) on appeal, determined the work performed was properly covered by the Federal Wage System. The appellants appealed to OPM following the CPMS decision, dated September 10, 2004.

General issues

The appellants submitted copies of two Air Force Standard CPDs, and position descriptions from the [state] Air National Guard and Defense Finance and Accounting Service, that they believe describe duties similar to those they perform. These position descriptions (PD) are all classified as GS-2210-11 Information Technology Specialists. Briefly, three of the PDs described duties involving administration, operation, and maintenance of an installation's computer network or internal operating systems. The fourth discussed responsibility for communications equipment. Positions which may on the surface appear similar may include significantly different duties and responsibilities that affect the classification. A position description does not stand alone and without knowing the mission and function of the organization in which the position is located, a classification determination cannot be made.

By law, we must classify jobs solely by comparing current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5346). Since comparison to standards is the exclusive method for classifying jobs, we cannot compare the appellants' job to others as a basis for deciding their appeal. Like OPM, agencies must classify jobs based on comparison with OPM standards and guidelines. However, the agency also has primary responsibility for ensuring that its jobs are classified consistently with OPM appeal decisions. If the appellants consider their job so similar to others that they all warrant the same classification, they may pursue the matter by writing to the appropriate agency level human resources office. In doing so,

they should specify the precise organizational location, classification, duties, and responsibilities of the positions in question. If the positions are found to be basically the same, the agency must correct their classification to be consistent with the appeal decision. Otherwise, the agency should explain to them the differences between their position and the others. As the appellants are questioning positions within different Department of Defense agencies, these concerns should be directed to CPMS.

Job information

The appellants are assigned to the Telephone Maintenance work center for [name] AFB. The organization's function is to install, test, evaluate, modify, maintain, and report on the full range of communications-electronics equipment and systems for the [number] Space Communications Squadron and tenant units located on and off base. The appellants are supervised by a Telecommunications Mechanic Supervisor, WS-2502-11 who also supervises the Cable Maintenance work center. The Telephone Maintenance work center includes five civilian positions, including the appellants, and nineteen military positions of varying ranks ranging from airman to technical sergeant. The Cable Maintenance work center has three authorized military positions.

The appellants administer, program, and maintain the base's integrated telecommunications network consisting of a digital electronic telephone system, local area network, firewalls, hub, switches, and routers. The system used is the Avaya Definity Enterprise Communications Server which processes and routes telephone calls and data communications from one point to another through port circuits. An overview of the Definity Server provided by the appellants states the system makes high-speed connections between analog and digital trunks, data lines connected to host computers, data entry terminals, personal computers, and Internet Protocol (IP) addresses. The appellants troubleshoot problems and repair and replace equipment. This may involve replacing cards in routers, correcting software programming faults, or testing and repairing electronic components.

The appellants serve as technical advisors, providing assistance/guidance to system users, program managers, and contracting personnel. They review plans and specifications for telecommunication projects to ensure user requirements have been considered. They provide guidance, training, and assistance to system users. The appellants provide technical assistance to base and higher-level planners in implementing communication system changes. They monitor the progress of work performed by engineering and installation teams and certify completion of projects in accordance with contractual requirements. They also assist the Systems Telecommunications Engineering Managers Team in designing and planning the base cable plant.

The appellants serve as ad hoc team leaders for military staff assigned to the Telephone Maintenance work center. The appellants provide on-the-job training and technical oversight over the military personnel who perform telecommunications support work, such as installing and maintaining the fiber and copper cabling. They provide input to the supervisors of the military personnel concerning individual performance for their Enlisted Performance Records.

The above duties constitute the bulk of work performed by the appellants. Other assigned duties are described in the appellants' CPD. However, they occupy a minor portion of the time and are not germane to the pay category determination. The appellants' supervisor certified the accuracy of CPD [number]. Because the appellants believe the proposed PD is accurate, and the duties and responsibilities contained in it are identical to the one to which they are officially assigned, we find CPD [number] to be an accurate description of the work they perform and have incorporated it by reference in this decision.

To help decide this appeal, we conducted an on-site audit with one of the appellants (Mr. [name]) and the appellants' immediate supervisor on January 13, 2005. We followed up with a telephone call to Mr. [name] on January 28, 2005, to obtain additional information. In deciding this appeal, we carefully considered the audit findings, information obtained by telephone, and all information of record furnished by the appellants and the agency.

Pay category determination

Section 5103 of 5 U.S.C. requires that a pay category determination be made as the first step in the position classification process. Section 5102 (c)(7) exempts from the General Schedule (GS) employees in recognized trades or crafts, or other skills 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 requirements. 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 Federal Wage System (FWS). Paramount does not rely on percentages of work time.

Briefly, the appellants' rationale relies on the exclusion from the Telecommunications Mechanic standard, i.e., work involved in repairing, troubleshooting, calibration, and testing electronic digital computers and peripheral equipment and the inclusion of that work in one of the GS-2210 PDs submitted. They also state that the Avaya System is a digital computer.

The GS-2210 series covers administrative work in which the paramount requirement is knowledge of information technology (IT) principles, concepts, and methods. The appellants maintain their work requires such a knowledge requirement, especially with respect to the specialties of network services and customer support. Network services involve the planning, analysis, design, development, testing, quality assurance, configuration, installation, implementation, integration, and maintenance of networked systems used for the transmission of information in voice, data, or video formats. Inherent in this specialty is the in-depth IT knowledge necessary to design and develop network systems, not to just maintain them. The work performed by the appellants does not involve design and development and, thus, does not require the broad and in-depth knowledge of IT principles and concepts expected of this specialty.

The customer support specialty in the GS-2210 series involves planning and delivering customer support services, including installation, configuration, troubleshooting, customer assistance, and training. While the appellants perform most of the common functions described for this specialty in the GS-2210 standard, they do so in the context of an off-the-shelf software program and for a very specialized system. The standard provides a cautionary note that positions responsible for assisting customers resolve problems with commercial off-the-shelf software should be classified in the GS-335 Computer Clerk and Assistant Series or other related one-grade interval series. This cautionary note emphasizes the broad and in-depth knowledge needed to be classified in this series. Again, the appellants do not apply the extensive IT knowledge required for this specialty.

Additional guidance in the GS-2210 standard on distinguishing between IT workers and IT users states that work covered by this standard requires knowledge of IT systems, concepts, and methods as the paramount requirement, as opposed to IT user positions that require paramount knowledge of other subject matter principles, concepts, and methods and ancillary knowledge of IT systems, concepts, and methods. The ancillary knowledge of IT may be used as a required qualification or selective factor for rating applicants for a position, but this requirement does not justify assignment of the position to the IT occupational group. We find this to be the case regarding the appellants' work. The appellants do not need to know how computers work internally and how programs are developed which is characteristic of the GS-2210 series. While knowledge of certain IT concepts and methods, such as knowing how to program and route calls through IP addresses or replacing expansion cards in routers, is important in the appellants' work, it is ancillary to the primary and paramount knowledge requirement of telecommunications principles related to equipment maintenance and repair.

We also closely reviewed the GS-391 Telecommunications Series, a related occupation, for possible coverage of the appellant's work. This series covers technical work in developing specifications and planning telecommunications programs and projects. The work involves the acquisition, technical acceptance, installation, testing, modification, and replacement of telecommunications equipment, services, and systems. The appellants' involvement in work of this nature is that of providing input and making recommendations. Higher levels of authority within the Communications Squadron or Space Command are responsible for performing the type of work covered by the GS-391 series.

Neither CPD #[number] nor the proposed CPD submitted by the appellants reference IT as a knowledge requirement. However, both cite knowledge of telecommunications principles, practices, procedures, and equipment as most important for recruitment and classification purposes. We find the appellants' primary and paramount duties flow from the mission and function of the organization to which they are assigned; i.e., telecommunications maintenance. We find the work performed by the appellants is appropriately covered by the Federal Wage System Job Grading Standard (JGS) for Telecommunications Mechanic, 2502. This occupation covers jobs that install, modify, troubleshoot, repair, and maintain voice and non-voice communication systems. Such work requires knowledge of telecommunications equipment and procedures; basic electrical and electronic principles; ability to understand and follow circuit descriptions, schematics, and layout sheets; and the ability to locate and repair trouble.

The grade 11 criteria in the 2502 JGS compare favorably with the appellants' work and further demonstrate why coverage under this standard is appropriate. Similar to the work described in the standard, the appellants install, test, troubleshoot, program, maintain, and repair digital switching equipment and components, peripheral, and other associated equipment in the base's central office. To do this work, the appellants apply knowledge of telecommunications principles and the operational capabilities and limitations of communication systems in order to interconnect the systems; provide technical advice and assistance regarding the installation of circuits, such as integrated services digital network circuits, video teleconference circuits, radio remote equipment, and high capacity data circuits; and evaluate proposals and approaches. The appellants apply a working knowledge of digital switch subsystems, such as the computer processor unit, disk drives, trunk and line circuit packs for analog and digital ports, and long distance recorders. They must be skilled in using sophisticated test equipment, such as data pack analyzers and signal generators, to identify and resolve problems in the central office. The appellants must be able to analyze and interpret system schematics in order to assist in the design and implementation of the base cable plant. Work of this nature requires a trades knowledge of telecommunication systems and is covered by the 2502 JGS.

Decision

The appellants' job is properly covered by the Federal Wage System.