

Pay Category and Job Grading Appeal Decision
Under section 5103 and 5346 (c) of title 5, United States Code

Appellants: [names of two appellants]

Agency classification: Telecommunications Mechanic
WG-2502-11

Organization: Inside Plant Section
Network/Switch Branch
Information Technology Systems
Support Division
Directorate of Information Management
United States Army Garrison
Army Installation Management Agency
Department of the Army
[location]

OPM decision: Telecommunications Mechanic
WG-2502-11

OPM decision number: C-2502-11-01

/s/ Robert D. Hendler

Robert D. Hendler
Classification and Pay Claims
Program Manager
Center for Merit System Accountability

January 25, 2008

Date

As provided in section S7-8 of the *Operating Manual: Federal Wage System*, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government. There is no right of further appeal. This decision is subject to discretionary review only under conditions specified in section 532.705(f) of title 5, Code of Federal Regulations (CFR) (address provided in the *Introduction to the Position Classification Standards*, appendix 4, section H).

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Introduction

On May 31, 2007, the Dallas Field Services Group (now Oversight and Accountability Group) of the U.S. Office of Personnel Management (OPM) accepted a pay category appeal from [names of two appellants] through their union representative. The appellants occupy identical additional jobs (hereinafter referred to as job) currently graded as Telecommunications Mechanic, WG-2502-11. They believe their job should be classified in the General Schedule (GS) system as Telecommunications Specialist, GS-391, at the 11 grade level. The appellants work in the Inside Plant Section, Network/Switch Branch, Information Technology Systems Support Division, Directorate of Information Management (DOIM), United States Army Garrison, Army Installation Management Agency, Department of the Army, at [location]. The appellants perform essentially identical duties and are assigned to the same position description (PD), number [number]. Therefore, we have processed this case as a group appeal. We received the agency's administrative report on July 5, 2007. We have accepted and decided this appeal under sections 5103 and 5346(c) of title 5, United States Code (U.S.C.).

Background and general issues

The appellants' job was previously graded as an Electronic Integrated Systems Mechanic, WG-2610-12. They first requested a review of their job's grade level through former supervisors in March 2004. After several unsuccessful attempts, the appellants requested a PD review by filing a grievance through the bargaining unit. Subsequent events led the appellants to file a formal equal employment opportunity complaint with the terms of a settlement agreement requiring the agency to review the job's PD and grade. The appellants were initially told their job would be graded as a Telecommunications Technician (Inside), GS-392-7, but the United States Army Civilian Human Resources Agency's West Region Operations Center later determined their job was properly graded as Telecommunications Mechanic, WG-2502-11, as explained in their February 12, 2007, evaluation statement. The change in series and grade was effected on March 18, 2007.

The appellants said the agency downgraded their job as an act of retaliation. In adjudicating this appeal, our responsibility is to make our own independent decision on the proper grading of the appellants' job. By law, we must make that decision solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5103, 5106 and 5346). We have considered the appellants' statements only insofar as they are relevant to making that comparison.

The appellants also discuss the large size of the base, the increasing number of customers supported and their impact on the volume of work. Volume of work is not considered in determining the grade of a job (*The Classifier's Handbook*, chapter 5); however, base size and customer population affect the type of telephone switch purchased and its capabilities, as well as the resulting work required to maintain switch operation and complexity of problems encountered. We will discuss the grade impact of these conditions later in the decision.

The appellants said their job performs work similar to positions at other Army bases classified as Telecommunications Specialists, GS-391-11. The appellants submitted a [another location] PD

classified at GS-391-11, which they believe describes duties identical to their own. There are similarities between the appellants' work and the duties described in the GS-11 PD, but we noted the PD describes a position, unlike the appellants', responsible for performing telecommunication traffic studies and analyzing trends in equipment and circuit performance to make enhancement or modification recommendations.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. OPM, under the provisions of section 511.612 of title 5, Code of Federal Regulations, may require a consistency report when in the adjudication of an appeal it finds reason to believe identical, similar, or related positions may be classified inconsistently with the appealed position. This process is also applicable to Federal Wage System (FWS) appeals as delineated in the *Introduction to the Position Classification Standards (Introduction)*, Appendix 4.I. However, this action is not required in this appeal. Since the PD submitted by the appellants is not essentially identical to the appellants' position, our tasking of a consistency review is neither necessary nor appropriate.

Job information

DOIM is responsible for providing reliable communications and information services to the approximately 71,000 individuals within [location's] military, civilian, and contractor community. Initially, the appellants' Standard Form (SF)-50s indicated they were assigned to the Communications Branch although recent restructuring within DOIM shifted their jobs to the Network/Switch Branch with supervision provided by a vacant Branch Chief position classified as a Supervisory Information Technology Specialist (Network), YC-2210-02. However, we understand a WS-2502-12, Telecommunications Mechanic Supervisor, job has been filled; and this individual will serve as the appellants' first-level supervisor with the Branch Chief as second-level supervisor.

The appellants' job is responsible for assuring the availability of telephone and data network connectivity to base customers by maintaining, troubleshooting, and repairing the telephone switch housed in the Digital Central Office (DCO). The digital switch, Nortel Networks Corporation's Meridian SL-100 communications system, works to connect the base's commercial local, long-distance, and Defense Switch Network incoming and outgoing telephone calls. The appellants estimate spending approximately 75 percent of their time in switch support work. This work may include diagnosing and/or repairing system failures detected by trouble indicators including system-embedded alarms, customer reports, log messages, or operational experience. The switch automatically generates alarms and possible causes in situations involving fault conditions, changes in state, or test failures. The appellants investigate system conditions and irregularities to isolate and repair software-related problems. If the alarm or line test suggests the problem is related to DCO-external hardware, the appellants notify the Outside Plant to repair the problem.

The appellants' switch work also involves preventive maintenance to ensure the equipment operates within certain standards and functions properly. Work order requests are routed through the Branch's Telephone Service Center, which reviews and obtains approval for the request prior to forwarding to the appellants for completing. For requests involving new telephone

subscribers, the appellants will assign the appropriate Network Class of Service (i.e., the control for the type of calls that can be made) and configure a telephone with the requested features including voicemail, call transfer, three-way calling, etc.

The appellants said they spend 10 percent of their time performing contracting officer's representative duties related to the Long-Term Life Cycle Support contract for Nortel's digital switching system. This work involves procuring parts and materials (e.g., telephone equipment, equipment cards, switch parts, and line cards), monitoring the shipment and delivery of procured products and services, and periodically inventorying supplies. The appellants' acting immediate supervisor instead believes they spend only five percent of their time on this work and 80 percent on the switch support work described above.

The remaining 15 percent of the appellants' time is divided equally between operating the base's telephone help desk and maintaining and cleaning equipment at eight remote sites. The help desk currently operates Monday through Friday from 7:30 a.m. to 4:30 p.m. The appellants log in "trouble tickets" to track caller activity. They work tickets if the problem is software-related or forward them to the Outside Plant if it is hardware-related. Of the estimated 100 calls received weekly, the appellants said 25 percent are resolved by the Inside Plant and 75 percent by the Outside Plant. The appellants travel to remote sites located three to 56 miles away from their normal work location. These duties primarily involve cleaning and maintaining batteries and replacing line cards within the switch's frame. The appellants rotate this responsibility and each has an Outside Plant employee accompanying them for safety reasons.

The appellants' PD and other material of record furnish much more information about their duties and responsibilities and how they are performed. The acting Branch and Division Chiefs certified to the accuracy of the appellants' PD, but the appellants raised issues about their PD's accuracy. Their disagreements with the PD include its percentages of time allocated; failure to describe all of the system administrator duties; and its evaluation as it does not fully describe the technical knowledge and certifications required.

A PD is the official record of the *major* duties and responsibilities assigned to a job by an official with the authority to assign work. Major duties are normally those occupying a significant portion of the employee's time. They should be only those duties currently assigned, observable, identified with the position's purpose and organization, and expected to continue or recur on a regular basis over a period of time. OPM considers a PD to be accurate for classification or job grading purposes when the major duties and responsibilities of the job are listed and proper classification or grading can be made when the PD is supplemented by otherwise accurate, available, and current information on the organization's structure, mission, and procedures. We found the appellants' PD broadly describes the major duties and responsibilities assigned although it includes minor duties not currently being performed (e.g., developing local operating instructions and manuals). Nonetheless, 5 CFR 511.607(a)(1) discusses PD accuracy issues and states that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management and performed by the employee. The point here is that a real operating job is classified or graded and not simply the PD. This decision must be based on the actual work assigned to and performed by the appellants.

To help decide this appeal, we conducted telephone audits with the appellants on August 28, and 31, 2007. On September 11, 2007, we conducted a joint telephone interview with the individual who has been acting as Branch Chief and the IT Systems Support Division Chief (YC-2210-02), who was the appellants' second-level supervisor when the appeal was initially filed. In order to gain a better understanding of the appellants' work, we conducted a local, on-site interview with subject matter experts at another Government facility on October 4, 2007. In reaching our appeal decision, we carefully considered all of the information gained from these interviews, as well as the written information furnished by the appellants and their agency.

Pay category determination

As required by 5 U.S.C. 5102, a pay category determination is the first step in the position classification process. Section 5102(c)(7) exempts from the GS those "employees in recognized trades or crafts, or other skilled mechanical crafts, or in unskilled, semiskilled, or skilled manual-labor occupations, and other employees including foremen and supervisors in positions having trade, craft, or laboring experience and knowledge as the paramount requirement..." The *Introduction* defines a paramount requirement as the essential, prerequisite knowledge, skills, and abilities needed to perform the primary duty or responsibilities for which the position was established. Whether a job is in a trade, craft, or manual labor occupation depends primarily on the duties, responsibilities, and qualification requirements; i.e., the most important requirement for the performance of a primary duty or responsibility for which the position exists. If a job clearly requires trade, craft, or laboring experience and knowledge to perform its primary duty, the job is graded under the FWS.

The *Introduction* states a job is excluded from the GS if its primary duty involves the performance of physical work requiring knowledge or experience of a trades or manual labor nature. We realize the Inside Plant duties may not appear as trades or manual labor work in comparison to the distinctly FWS work performed by the Outside Plant staff, whose duties include but are not limited to installing telephones, cabling between customer premises and switching locations, correcting cable problems, etc. The appellants occasionally perform physical work like maintaining air filters, cleaning line cards and switch terminals, and running wire jumpers originating from the DCO to telephones connected to its switch; however, their work is primarily performed in an office environment. FWS work has changed with repair tools and equipment becoming more computerized, and some FWS employees may do very limited "manual" labor in the traditional sense. Consequently, the chief determinant of pay category is the knowledge and experience required to perform the primary duty, and not the work setting or the tools used.

The appellants' primary duties flow from the mission and function of the Inside Plant organization to which they are assigned. The plant is responsible for maintaining the base's telephone systems, networks applying to telephone services and data communication equipment, and cables stemming from the DCO and its remote sites. The appellants' job is responsible for telecommunications maintenance as supported by their PD, interview findings, and other documentation. For example, their current performance appraisal plan describes the job as follows:

Serves as technical and administrative telecommunications mechanics of the Inside Plant Section. Performs all duties detailed in current position description pertaining to the telephone switch to include weekly and monthly scheduled maintenance. Performs all required maintenance on the switch and at all (8) Remote Service Center (RSC).

To perform these duties, the work requires hands-on trade knowledge and skills; e.g., of telephone and data circuitry equipment, switch and switch interface, and basic electrical and electronic principles pertaining to voice transmissions. The appellants individually acquired trade knowledge and skills by performing similar telecommunications mechanic work for the military or by performing other related work. Maintenance and repair work is normally regarded as FWS while evaluation and design work is considered as GS. We considered the mandatory certification courses completed by the appellants and determined its' primary objective is related to the "how-to" processes common to maintenance and repair work. For example, an abbreviated list of completed courses is as follows: SL-100 maintenance for basic switch maintenance including changing a line card, line testing, etc.; SL-100 translations for programming telephones to the switch; Servord for configuring telephones with assorted features; and Automatic Call Distribution System Administration for routing incoming calls to designated call center agents at the base's hospital. Since the paramount requirement for the appellants' primary duties is hands-on trades knowledge and skill, the work is exempt from the GS and assigned to the FWS.

The appellants believe their job should be classified as GS-391, Telecommunications Specialist. Similarities exist between GS-391 and WG-2502 work; e.g., installation and modification of telecommunication facilities is common to both occupations though this is more of an oversight function for work in the GS-391 series. GS-391 work involves technical *and* analytical work pertaining to the planning, development, acquisition, testing, integration, installation, utilization, or modification of telecommunications systems, facilities, services, and procedures. Similar to the appellants' work, GS-391 work is concerned with the movement of information between locations and thus requires an understanding of basic electronics theory and operating principles, application of existing technology to communication requirements, and equipment interoperability and compatibility.

However, specialists in the GS-391 series are responsible for developing short- and long-term telecommunication plans, policies, and procedures. In contrast, the appellants' work is reactive by design and limited to diagnosing and repairing specific telecommunications problems. Their work is driven primarily by routine preventive and maintenance tasks, pre-approved work order requests, and help desk calls with the end product taking shape immediately and concretely; i.e., when the problem is resolved or the work order is completed. This environment precludes the appellants from performing customary GS evaluation and design tasks like developing plans for the work to be done, evaluating study questions, collecting data, anticipating and addressing problems encountered, and producing a product with findings. The appellants run routine and ad hoc reports regarding the uniform call distribution, automatic call distribution, call detail groups, trunk traffic, etc. GS-391 specialists run similar reports, but they, unlike the appellants, are further tasked with analyzing data to identify trends in speed, service quality, and traffic pattern conditions. Although applying technical judgment comparable to FWS employees, GS-391

specialists use this knowledge as a springboard to prepare recommendations and decisions concerning the quality, acceptance, and improvement of telecommunications systems.

The appellants' work is covered extensively by well-documented and defined programming guidelines including CDs, books, and training manuals for use as troubleshooting guides. If unable to locate or interpret guidelines, they occasionally contact counterparts at other bases or a technical support operation, which is costly and requires prior supervisory approval. The appellants, in addition to the telephone switch server, maintain the following servers: switch expert for reporting on trunk usage; call pilot for voicemail; Nortel Contact Center Manager for monitoring the base hospital's call center calls; and call collector for tracking calls-in, calls dropped, or short calls. They perform weekly back ups of data for storage in the event data recovery is required. Servers automatically generate alarms, which require the appellants to translate server-produced codes to determine the location, nature, cause, and possible solution to problems. Nortel and other vendors apply security patches and updates directly to servers after contacting the appellants for temporary access. This work is comparable to mechanics using FWS knowledge and experience as a basis for "second thought" to understand the design concept of others, diagnose the operation of equipment, and locate and correct malfunctions.

GS employees may use similar knowledge and experience but as a basis for "new thought," as illustrated by factor-level descriptions in the GS-391 position classification standard (PCS). Briefly, the GS-391 PCS is written in the Factor Evaluation Format, under which factor levels and accompanying point values are assigned for each of the nine factors with Factor 1 (Knowledge Required by the Position) carrying the most weight. Level 1-6, the lowest level described in the PCS, describes employees applying knowledge of commonly applied telecommunications principles, concepts, and methodologies to independently perform work involving segments of large projects or taking full responsibility for well-defined projects; skill in weighing cost, variations in electronic and other equipment characteristics, equipment availability, and kinds of communications required; and knowledge of standardized telecommunications equipment, services, and processes to review contractual relationships for equipment and services, network requirements, on-line security protection, etc. The PCS provides Level 1-6 illustrations including conducting telecommunications surveys, coordinating individuals in resolving compatibility issues potentially impacting plans and recommendations, monitoring administrative processes like project funds, or directing the operations and planning for a local communication center. The GS-391 PCS provides further factor-level descriptions and examples illustrating knowledge and experience as the groundwork for "new thought," which contrast noticeably with the appellants' repair and maintenance work. Therefore, the appellants' job is excluded from the GS and appropriately classified in the FWS.

Occupation, title, and standard determination

The appellants' work is appropriately covered by the FWS Job Grading Standard (JGS) for Telecommunications Mechanic, 2502. This occupation covers installing, modifying, troubleshooting, repairing, and maintaining voice and nonvoice communication systems. Like the appellants' work, 2502 work requires knowledge of telephone and data circuitry equipment and installation procedures; knowledge of basic electrical and electronic principles pertaining to voice and nonvoice transmissions; the ability to understand and follow such technical guidance

as circuit descriptions, schematics, and layout sheets; and the ability to locate and repair trouble within the telecommunications system. Jobs in the 2502 occupation, at grades 10 and above, are titled *Telecommunications Mechanic* which is the proper title for the appellants' job, based on the grade level analysis in the **Grade determination** section of this decision. The appellants' work is properly evaluated using the grading criteria in the 2502 JGS.

Grade determination

The 2502 JGS discusses four factors in determining grade level (i.e., Skill and Knowledge, Responsibility, Physical Effort, and Working Conditions).

Skill and Knowledge

At grade 11, mechanics install, test, troubleshoot, program, maintain, and repair digital switching equipment, attendant consoles, power and ringing relay racks, miscellaneous telephone, radio, fire alarms, intrusion alarms, and computer data circuits and related apparatus required in the central switching office. They analyze system failures and other unusual system occurrences to isolate the source of the problem and determine the cause, and perform scheduled preventive maintenance on the switching system components, subcomponents, peripheral, and other associated equipment. In some situations, they maintain manual and/or computerized central office records, including detail records, traffic analysis records, cable records, line records, and spare parts inventories. Grade 11 level mechanics apply a comprehensive knowledge of telecommunications principles such as switching, traffic, signaling, outside plant and networking and knowledge of the operational characteristics, capabilities, and limitations of electronic telecommunications equipment and systems to diagnose problems and determine corrective action. They have a working knowledge of digital switch subsystems such as the central processing unit, disk drives, trunk and line circuit packs for analog and digital ports, signaling converters, digital announcers, and long distance recorders. They apply a working knowledge of the central office's automated tables/files to retrieve maintenance information, directory assignments, call routes, trunk assignments, equipment features, and equipment interface conditions. They utilize a wide variety of test equipment to perform test procedures on lines, incoming trunks, outgoing trunks, central controller, input/output devices, networks, peripheral modules, link junctures, attendant consoles, channel bank equipment, and T-1 span repeater units.

The appellants' job meets but does not exceed the grade 11 level. The appellants install, test, troubleshoot, program, maintain, and repair digital switching equipment, attendant consoles, computer data circuits, and related apparatus required in the DCO and RSCs. They perform this work by applying knowledge gained from their certification training on telecommunications principles and the equipments' operational capabilities and limitations. Like the grade 11 level, the appellants perform scheduled preventive maintenance for the switching system and any associated equipment. They also resolve system failures or abnormalities that typically trigger programmatic alarms signaling to the appellants whether the situation is minor, major, or critical. Help desk customers, in contrast, are typically reporting individual and isolated problems, but the tasks of isolating the problem's source and determining the cause is similar regardless of the problem-reporting source. Depending on the information known, the appellants decide on the

proper course of action. For example, a customer may call the help desk to restore service if they have no dial tone, cannot break a dial tone, are unable to receive incoming telephone calls, or are experiencing any other type of out of service condition with their telephone line. Some situations are easily resolved (e.g., by making sure telephone calls are not being forwarded elsewhere), but others require the appellants to investigate further by operating a variety of test equipment like the multiplexer for pinpointing the location of the problem; T-1 tester for testing line speed; phone tester for checking dial tone; and a special program for troubleshooting fiber optic cabling problems. They also program the telephone switch; e.g., to tell it to recognize a new number prefix. As at grade 11, the appellants maintain equipment inventories and run reports on call details, line reports, trunk traffic, etc.

This factor is credited at the grade 11 level.

Responsibility

At grade 11, mechanics receive assignments from the supervisor in the form of work orders or complaint calls. They independently identify and initiate additional work to overcome problems observed during operation of the inside equipment. They plan and accomplish work using experience and judgment to interpret technical manuals, schematics, wiring diagrams, and flow charts. Completed work is reviewed for overall system operational efficiency, and spot checked for customer satisfaction and general review of resolved problems. The supervisor is available to provide technical assistance on unusual or very difficult problems.

Similar to the grade 11 level, the appellants independently determine priorities, what needs to be done, and how to do it. The appellants' day follows a regular pattern involving checking and clearing switch alarms; monitoring the Synchronous Optical Network with its fiber optic cabling for carrying large traffic volumes over long distances; opening the help desk queue; and completing pre-approved work orders. The appellants regularly juggle the unpredictable work order and help desk workload between the more predictable operational maintenance responsibilities, requiring them to constantly reprioritize based on situation criticality. As at the grade 11 level, they plan and accomplish work based on their specialized training, judgment, and fairly extensive work experience. As a result, they are able to respond appropriately if and when a system-embedded alarm is activated. The appellants decode the alarm's message to identify the problem's origin, severity, and possible solution. This and other situations involve conducting system and line tests at the appellants' discretion. They interpret and apply guidance in the manufacturer's technical manuals and operating instructions, schematics, wiring diagrams, and flow charts. The interview with the acting Branch and Division Chiefs confirmed that the appellants' work was not technically reviewed in the past as neither supervisor is technically qualified to work on the telephone switch. Instead, the appellants contacted counterparts at other bases or fee-based technical support for major or unusually complex problems (e.g., the loss of major telephone trunks). However, the newly appointed first-line supervisor will be available to provide technical assistance on unusual or very difficult problems. In general, the appellants' work is reviewed for overall system operational efficiency and spot checked occasionally for customer satisfaction.

This factor is credited at the grade 11 level.

Physical Effort

Physical effort is described similarly from the WG-8 to WG-11 levels. Like the grade 11 level, the appellants' work involves frequent standing, walking, bending, and climbing ladders in maintaining DCO and RSC telephone switch equipment. Running the switch's wires requires climbing ladders, stretching, and some strenuous arm movements in securely wrapping wires. Their maintenance of DCO and RSC equipment requires physically demanding work comparable to the grade 11 level, including vacuuming line cards, dusting terminals, cleaning air filters, cleaning or replacing batteries, and mopping and sweeping floors. The appellants' work also requires lifting and carrying equipment weighing up to 20 pounds unassisted (e.g., telephone switch components, test equipment, cleaning tools, etc.).

This factor is credited at the grade 11 level.

Working Conditions

The appellants' job meets but does not exceed the grade 11 level, where work is performed in well lighted and climatically-controlled areas. The DCO's main switch and the RSCs' mini-switches perform optimally at prescribed temperatures, so the appellants regularly monitor and report irregularities involving the air conditioners. They risk injuries from falling off ladders, minor cuts, and bruises in performing the physically demanding work described above. The appellants take precautions against dangers from battery acid or high voltage electrical circuits by wearing safety shoes and goggles when necessary.

This factor is credited at the grade 11 level.

In summary, since all four factors are credited at the grade 11 level, the appellants' job is properly evaluated at the grade 11 level.

Decision

The appealed job is properly covered by the FWS and graded as Telecommunications Mechanic, WG-2502-11.