

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

**Appellant:** [Name of appellant]

**Agency classification:** Locksmith  
WG-4804-9

**Organization:** [Appellant's organization/work location]  
U.S. Marine Corps

**OPM decision:** Locksmith  
WG-4804-9

**OPM decision number:** C-4804-09-01

---

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

September 25, 2008

---

Date

As provided in section S7-8 of the *Operating Manual, Federal Wage System*, this decision constitutes a certificate which 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 and time limits specified in section 532.705(f) of title 5, Code of Federal Regulations (address provided in the *Introduction to the Position Classification Standards*, appendix 4, section H).

As indicated in this decision, our findings show that the appellant's official job description (JD) does not meet the standard of adequacy described in *Federal Wage System-Appropriated Fund Operating Manual, Subchapter S6-6.d*. Since JDs must meet the standard of adequacy, the agency must revise the appellant's JD to reflect our findings. The servicing human resources office must submit a compliance report containing the corrected job description within 30 days of the date of this decision to the San Francisco Oversight and Accountability Group.

**Decision sent to:**

[Address of appellant]

[Address of appellant's servicing human resources office]  
U.S. Marine Corps

Director, Civilian Human Resources  
Headquarters, U.S. Marine Corps  
2 Navy Annex  
Code HRHB  
Room 1213  
Washington, DC 20380-1775

Director, Office of Civilian Human Resources  
Department of the Navy  
614 Sicard Street SE, Suite 100  
Washington Navy Yard, DC 20374-5072

Principal Classifier  
Department of the Navy  
Human Resources Service Center – Northwest  
3230 NW Randall Way  
Silverdale, WA 98383

Chief, Classification Appeals  
Adjudication Section  
Department of Defense  
Civilian Personnel Management Service  
1400 Key Boulevard, Suite B-200  
Arlington, VA 22209-5144

## **Introduction**

On January 29, 2008, the San Francisco Oversight and Accountability Group of the U.S. Office of Personnel Management (OPM) accepted a job grading appeal from [name of appellant]. On February 29, 2008, we received the agency's complete administrative report. The appellant's job is currently graded as Locksmith, WG-4804-9, but he believes it should be upgraded to grade 11 based on his work with computer-managed electronic locks and use of electronic equipment such as keying devices and the fact he occasionally develops some material and labor costs estimates for construction projects at the installation. The appellant works in the [appellant's organization/work location], U.S. Marine Corps. We have accepted and decided this appeal under section 5346 of title 5, United States Code (U.S.C.).

## **General issues**

The appellant believes the Job Grading Standard (JGS) for Locksmithing, 4804, is outdated. However, the content of JGSs established for his job is not appealable (section 532.701 of title 5, Code of Federal Regulations). All occupations change over time, some more rapidly and profoundly than others, but the fundamental duty and responsibility patterns and qualifications required in an occupation normally remain stable. Therefore, careful application of the appropriate JGS to the work performed should yield the correct grade for a job. Any duties not specifically referenced in the JGS can be evaluated properly by comparison with similar or related duties which the JGS describes as well as with the entire pattern of grade-level characteristics.

Although both the appellant and his supervisor have certified to the accuracy of the appellant's official JD [number], our findings disclosed that it is not completely accurate. The appellant's JD does not list the appellant's grade 9 level controlling duties and responsibilities, and the knowledge and skills required to perform them. For example, the JD does not list any major duties to indicate the appellant modifies and reworks locking devices to meet special security objectives, and does not specify that such knowledge is a requirement. In addition, text in the JD under the "Responsibility" factor incorrectly implies the job functions as a "lead locksmith", whereas we find the job performs no work leader responsibilities over employees engaged in trades and crafts work which meets the coverage requirements for application of the Federal Wage System JGS for Leader WL/NL. Therefore, the agency must revise the JD to reflect our findings addressed in this decision.

## **Job information**

Under general supervision, the appellant performs locksmithing functions at the [name of installation], and as the senior locksmith at the installation provides technical guidance as needed to a lower-graded locksmith in his unit. The [name of installation] conducts live-fire combined arms training, urban operations, and Joint/Coalition-level integration training which promotes operational forces readiness and provides the facilities, services, and support responsive to the needs of resident organizations. The appellant's primary function is to maintain, adjust, repair, and open a wide variety of commercially manufactured locking devices including combination, electrical door, cipher, and electromechanical locks, and panic devices. The security units

typically secured by such devices include safes, vaults, cabinets, and chests. In addition, he reworks locks to improve their structural or functional capability, and may substitute or fabricate parts for locking devices to meet special security objectives.

The appellant sets and changes combination locks as requested by authorized customers and duplicates and re-issues keys to rooms and buildings due to request, damage or loss by the authorized keyholder. He provides emergency lock services for incidents requiring entrance into offices, barracks, safes, and any other areas or equipment that is secured using a combination, key, cypher or electronic lock, and provides locking codes to outside contractors upon written approval. The appellant restores repairable locks to operating condition by disassembling, cleaning, and replacing worn, bent, or broken parts. During inspections, he checks for signs of tampering with safes and file cabinets and notifies security for investigation if tampering is detected. The appellant establishes and maintains master key coding systems, master keys all building locks by mathematically changing codes to a desired segment size and setting the core of the locks so the master and control keys operate properly, master keys other locks, maintains control of keys by proper identification and documentation, and conducts training of tenant organizations on the use of the electronic key coding systems.

The appellant uses a variety of hand, power, and specialty tools to do the work, e.g., files, chisels, hammers, picks, tweezers, drills, punches, grips, duplicating machines, lathes, grinders, buffers, drills, torches, and soldering irons. He maintains parts, materials, tools, and equipment at prescribed levels. The appellant maintains a safe, clean, and secure work environment and performs a variety of clean-up duties, such as cleaning equipment, sweeping, straightening, and lining up tools and other property in the assigned area.

In addition to his primary locksmithing duties, the appellant has been occasionally called upon to develop material and labor cost estimates for various construction projects at the installation.

In reaching our job grading decision, we have carefully reviewed all information furnished by the appellant and his agency, including his official JD which we have incorporated by reference into this decision. In addition, to help decide the appeal we conducted separate telephone interviews with the appellant and his immediate supervisor.

### **Series, title, and standard determination**

The agency allocated the appellant's job to the 4804 Locksmithing occupational series, titling it Locksmith, and the appellant does not disagree. We concur with the agency's title and series determination. The JGS for the 4804 series is the published directly applicable JGS which must be used for grading purposes which we have applied below to the appellant's job.

The appellant discusses occasional assignments preparing cost estimates for construction projects. However, this work was not regular and recurring. The appellant accepted it at his option for overtime pay, and collectively it required only a few weeks to complete over a year's time. Nevertheless, he believes such work warrants evaluation at a higher grade level. However, section II.C.3. of the Job Grading System, Part I, indicates duties which are not regular and recurring cannot affect the grade of a job.

The appellant states another JGS should be used to evaluate his tasks relating to repair of electronic equipment. The appellant repairs electronic locks by redoing wiring connections and replacing switches, clutches activated by an electronic motor, and circuit boards. He uses an automated testing device to identify defective parts on a circuit board and sometimes attempts quick repair by soldering replacement parts. The appellant uses temperature meters, thermometers, voltmeters, personal data assistants, and laptop computers to test fuses, lock opening and closing frequencies, voltage, and inter-lock compatibility. However, the record shows that these duties are not performed on a regular and recurring basis. Moreover, the knowledge of electronics and electronic theory and use of related tools required to perform such tasks was acquired by the appellant entirely from basic training provided by lock manufacturers on specific lock products. It does not reflect the breadth of work, or full depth or scope of the threshold series or grade-level determining knowledge described in any electronic equipment installation, maintenance, or repair occupational series JGS. Thus, this work has no series or grade-level impact.

### **Grade determination**

The 4804 JGS uses four factors to determine the grade level of a job: *Skill and Knowledge*, *Responsibility*, *Physical Effort*, and *Working Conditions*. A job is graded as a whole against the level of demands found at different grades. No single factor is considered by itself, but only in relation to its impact on the other factors. A job is allocated to the grade best representing the overall demands of the work.

#### *Skill and Knowledge*

At the grade 9 level, the highest level for this factor described in the JGS, locksmiths apply a thorough knowledge of the full range of locking devices and their parts in order to select substitute parts which would be suitable for use in fabricating locking devices to meet special security objectives. They experiment with various types of materials such as metals, alloys, and plastics when developing parts and components. They are able to select appropriate materials considering such factors as needed strength and hardness, machining characteristics, environmental factors, and the extent to which the materials used could complicate or hamper the use of standard neutralization techniques. In comparison, grade 8 locksmiths service a wide variety of commonly used locks, and the functions they perform involve repairing, replacing or fabricating parts covered by manufacturer parts catalogs and specifications.

Grade 9 locksmiths also apply a broad knowledge of the functions and capabilities of commercially manufactured locking devices, as well as their working interrelationships with a variety of equipment such as monitors, alarms, timing mechanisms, sensors, and other related items which make up a complete security or surveillance system in order to provide management with recommendations regarding the most suitable locks to be used in solving specific security problems. In comparison, grade 8 locksmiths need only apply knowledge of the internal structure and operating characteristics of locking devices in order to trouble-shoot and repair them. Locksmiths at this level also apply a more in-depth knowledge of neutralization

techniques than grade 8 locksmiths when conducting investigations to determine if locking devices have been tampered with.

At the grade 9 level, locksmiths perform the full installation and repair cycle on commercially manufactured locking devices, as well as rework locks to improve or provide new structural or functional capabilities. They are skilled in developing drawings or diagrams which identify necessary dimensions and special parts or surfaces to be used in the manufacture and installation processes. In comparison, grade 8 locksmiths have available appropriate guidelines, manufacturer drawings, diagrams and technical manuals. Grade 9 locksmiths are skilled in reworking and finishing substitute parts and fabricating parts to close fits. They coordinate their work with personnel in other shops or trades; i.e., machinists in identifying tolerances and machining irregularly shaped parts. They assemble, test, and evaluate the completed locking devices considering the desired objectives.

The skill and knowledge required by the appellant meets but does not exceed the grade 9 level. Like this level, he fabricates locking devices to meet special security objectives, e.g., by combining a spin-dial lock designed for a safe with a lock designed for a pedestrian door in such a way that it would protect classified material behind a door and force one-way egress. In fabricating such locking devices, the appellant uses and experiments with brass, copper, cast iron, plastic, and a variety of types of steel based on expected use, durability, environment, cost, benefit, and other factors. The appellant regularly makes suggestions to management regarding suitable locks, locking systems, and hardware, including computerized and electronic systems and how they might be integrated, to address specific security problems involving commercial locking devices and other security equipment, often at meetings regarding construction of new or remodeled buildings. The appellant uses a variety of tools, such as drills, cameras, scopes, carbide cutters, and electronic dialers; and techniques, such as picking, cylinder drilling, and circular latch cutting, in conducting investigations of lock tampering and in neutralizing locks.

Similar to the grade 9 level, the appellant performs the full installation and repair cycle on commercially manufactured locking devices and locking bolts, including investigation, diagnosis, disassembly, repair, replacement or fabrication of parts, cleaning, reassembly, and reinstallation. Although contractors are responsible for most initial locking device installations, the appellant approves such installations and is required to install certain electronic combination locks mandated by his agency. The appellant reworks locks to give them new structural or functional capabilities, e.g., modifying a lock to accept a lever and fabricating a new tailpiece to make the lock meet safety as well as security requirements by making it handicap accessible, and reassembling and adding pieces to an electronic lock so that it would work with a panic bar to track ingress and egress. The appellant fabricates parts such as tailpieces and cams to close fits and coordinates such work with other shops and trades, such as machinists. He develops drawings or diagrams of lock parts or surfaces to facilitate working with other shops and trades and to document his lock modifications. The appellant also assembles, tests, and evaluates completed locking devices.

The appellant cites creating databases, programming locks, encoding ID or access cards, repairing data problems, downloading and uploading information from and to a computer and personal data assistant (PDA), and training Marines in the use of computerized locking devices

as duties requiring special technical knowledge and skills not covered by the 4804 JGS. The appellant believes that such work with computerized locking systems and devices requires knowledge and skill that exceeds the grade 9 level.

We find the appellant's computer and electronic lock work does not require any grade level determining knowledge of information technology. He does not install, develop, or test databases; write computer code; restore corrupted data; or repair computer equipment. He enters information into a database provided by the lock manufacturer; exchanges data between a computer and locks using a PDA, coding device, and simple commands; corrects data entry errors and rare data file corruptions not by any restoration protocols but by re-keying data; calls up upon request of law enforcement and with a few simple keystrokes a lock audit trail on a computer or PDA; contacts the lock manufacturer for technical support; replaces circuit boards as necessary; and trains Marines for a couple of hours on how to use the manufacturer's computer system to make room locks.

While in the aggregate such tasks are time-consuming, they reflect or build upon his primary knowledge of locks and locking systems, cover simple data processing, do not change his basic locksmith duties, and do not materially enhance the paramount knowledge or skills required to perform them. The knowledge necessary to perform these tasks was acquired by the appellant primarily from a week or two of onsite initial and refresher training provided by the manufacturer. The appellant notes he once provided a requirements document to the manufacturer to help it develop its system to meet the security needs of [name of installation], but this task was not regular, recurring, or assigned; and, like the appellant's suggestions on how to integrate existing computerized and electronic security systems, its successful execution did not require any specific knowledge of information technology. This knowledge and attendant skills reflect the gradual evolution of locksmithing technology. Because this knowledge supports his primary tasks, and is easily obtainable on the job, it does not significantly enhance the knowledge and skill level required to perform the appellant's work. Thus, it has no grade-level impact.

### *Responsibility*

At the grade 9 level, locksmiths receive assignments from the supervisor specifying the desired final product. They independently solve problems which require modification of accepted trade practices, procedures and methods and must make more difficult judgments and decisions when modifying and reworking locking devices for special security objectives than is required of grade 8 locksmiths who apply accepted trade practices in conjunction with the application of specific guidelines and technical manuals. Grade 9 locksmiths may also be responsible for providing technical assistance and guidance to remote customer locations. They typically receive no technical supervision, and their work is reviewed on the basis of meeting user needs.

The appellant's responsibility meets but does not exceed the grade 9 level. Like this level, he receives assignments from his supervisor (Maintenance Mechanic Supervisor) in the form of general work orders identifying the desired final product. He independently investigates security problems and solves technical issues requiring modification of accepted trade practices (e.g., material selection), procedures and methods, especially when reworking locks and locking

devices and systems to meet special security objectives and ensure optimal protection of life and property. Similar to the grade 9 level, he is the principal locksmith responsible for providing technical advice and assistance to staff working at remote locations such as radar installations on mountain tops. During the course of his assignments, he receives no supervisory guidance, instructions or technical oversight, and his work is reviewed solely on the basis of meeting customer needs.

#### *Physical Effort*

The physical effort described at the grade 9 level is the same for the grade 8 level in the JGS. The grade 8 level specifies that in addition to the physical effort described at the grade 7 level, which involves lifting or carrying items weighing in excess of 7 kilograms (15 pounds), and frequent standing, stooping, bending, or kneeling in awkward work areas, grade 8 level locksmiths may be required to lift security containers weighing up to 23 kilograms (50 pounds) and heavier weights with assistance. The appellant's physical effort is similar to that described at the grade 8 level and thus also meets the grade 9 level.

#### *Working Conditions*

The working conditions described at the grade 9 level are the same for the grade 8 level in the JGS. The grade 8 level specifies that in addition to the working conditions described at the grade 7 level, which involves working inside in well lighted and ventilated areas, with occasional work outside in bad weather, and exposure to cuts and scrapes, grade 8 locksmiths are exposed to the possibility of burns while using acetylene torches, brazing torches, and soldering irons. The appellant's working conditions are similar to those described at the grade 8 level and thus also meet the grade 9 level.

#### **Decision**

The appellant's job is properly graded as Locksmith, WG-4804-9.