

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

Atlanta Field Services Group
75 Spring Street, SW., Suite 1018
Atlanta, GA 30303-3109

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

Appellant: [appellant]

Agency classification: Equipment Specialist
GS-1670-9

Organization: [organization] Branch
[organization Team
Facilities and Environmental Directorate
Submarine Base
U.S. Department of the Navy
[location]

OPM decision: Equipment Specialist
GS-1670-9

OPM decision number: C-1670-09-02

/s/ Virginia L. Magnuson
Virginia L. Magnuson
Classification Appeals Officer

September 18, 2003
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]
[organization]
[address]
Naval Submarine Base
[location]

[name]
VP
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Introduction

On June 16, 2003, the Atlanta Field Services Group, U.S. Office of Personnel Management (OPM), accepted an appeal from [appellant]. His position is currently classified as Equipment Specialist, GS-1670-9. The appellant requests that his position be reclassified as Mechanical Engineering Technician, GS-802-11, or Contract Surveillance Representative, GS-1101-11. His position is located in the [organization] Branch, [organization] Team, Facilities and Environmental Directorate, Submarine Base, U.S. Department of the Navy, [location]. We received the complete administrative report, forwarded by the agency, on June 5, 2003. The appeal has been accepted and processed under section 5112(b) of title 5, United States Code (U.S.C.).

Background information

In January 2003, the appellant submitted an appeal to his agency requesting that his position, then classified as Contract Surveillance Representative, GS-1101-9, be reclassified as Contract Surveillance Representative (VTE Inspector), GS-1101-11. On April 16, 2003, his agency issued a decision reclassifying the position to Equipment Specialist, GS-1670-9. The appellant subsequently appealed to OPM.

In June 2, 2003, OPM posted a new Job Family Standard (JFS) for Administrative Work in the Equipment, Facilities, and Services Group, GS-1600 on its website. The issuance of this JFS cancelled the previous position classification standard for the Equipment Specialist Series, GS-1670. It renamed the Equipment Specialist Series, GS-1670, to Equipment Services Series. Section 5107 of title 5, U.S.C., requires that positions be classified using current published OPM standards. Therefore, we have applied the new JFS into this decision.

In reaching our classification decision, we have carefully reviewed all information furnished by the appellant and the agency, including information obtained from telephone interviews with the appellant and his immediate supervisor.

General issues

The appellant believes that the agency did not properly evaluate his work in determining the grade of his position and that there were inconsistencies in the identification of position performance requirements and the decision rendered. In adjudicating his appeal, our only concern is to make our own independent decision on the proper classification of his position. By law, we must make that decision solely by comparing his current duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). This decision is based on the work currently assigned to and performed by the appellant and sets aside any previous agency decision. Therefore, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

Position information

The appellant is assigned to position description number 01332000. The appellant and his supervisor certified the accuracy of the position description.

The [organization] Team is responsible for monitoring the performance of the Base Operating Support Contractor (BOSC) in the operation and maintenance of Submarine Base (SUBASE) facilities and services that support training, strategic weapons and major overhaul of [name] nuclear submarines.

The appellant plans and carries out contract quality surveillance and oversight and inspection and certification functions. He serves as the Contracting Officer Technical Representative (COTR) for the installation's Annex 15 (Building and Structures Maintenance and Repair) for 60 percent of his time. In this capacity, the appellant performs quality surveillance of the operation, maintenance, and repair of mechanical and high volume air conditioning (HVAC) systems by the Base Operating Support Contractor (BOSC). The contract covers all mechanical and HVAC systems and equipment in facilities belonging to the Submarine Base and three co-located tenant commands. This includes industrial plant equipment, compressed gases, heat generation, air conditioning, refrigeration, liquid heat transfer, air distribution, and controls and instrumentation. Also included are fire suppression systems, appliances, elevators, lifts, and conveyors. As the COTR, the appellant performs acquisition quality assurance tasks, and contract quality assurance administrative functions. He prepares government cost estimates, acts as day-to-day liaison between customers and contractors, and provides quality assurance evaluations for technical quality assurance guidance. He performs contract administration of payment verification for fixed price services and prepares contract price adjustments and award fee calculations for these services. The appellant uses a quality assurance surveillance program to inspect contractor performance to ensure that technical requirements and specifications in the contract are met. He ensures that preventive maintenance and inspections are performed according to schedule, reviews contractor prepared documents related to repairs, modifications, alterations, and minor construction to ensure that they are valid and that methods used are appropriate. The appellant prepares performance work statements (PWS) that identify contract specifications for specific tasks and services and the scope of work to be performed, equipment required to accomplish the task, and equipment to be supplied by the government. The appellant also provides technical oversight of the contract surveillance work performed by five Quality Assurance Evaluators, working in other annexes, and reviews and approves their evaluation worksheets.

The appellant spends the rest of his time (40 percent) engaged in activities related to the installation's Vertical Transportation Equipment (VTE) which includes elevators, material and personnel hoists, and automotive lifts. This work involves the inspection, investigation, testing, and certification of installation, maintenance, and repair work performed by contractors for new and existing VTE systems, subsystems and related fire protection systems. The appellant determines the reliability of contractor maintenance procedures, ensures that the maintenance and repairs are appropriate for the type of VTE and extent of usage, and performs or witnesses all required acceptance, operational and safety tests. He reviews plans and specifications for the design of VTE and systems to ensure compatibility with all applicable codes, standards, policies, and regulations. The appellant is responsible for establishing and maintaining all required records, reports, certifications, testing data, and inventory for all VTE located at the installation.

The appellant receives administrative supervision from the Supervisory Contract Surveillance Representative who has overall responsibility for annexes covering custodial services, refuse collection and disposal services, roads grounds and railroads, building structures maintenance, grounds structures maintenance and pest control service. The appellant plans and carries out his surveillance duties. He consults with engineers and technical personnel in developing plans and specifications for contractor personnel. The supervisor is kept apprised of the status of work in progress and any unusual issues or problems involving contractors that arise.

The position description contains more information about how the position functions and we incorporate it by reference into this decision.

Series, title and standard determination

The agency classified the appellant's position in the former Equipment Specialist Series, GS-1670, and titled it Equipment Specialist. The appellant believes that his position should be classified in the Engineering Technician Series, GS-802, or the General Business and Industry Series, GS-1101.

The appellant has major responsibilities in two areas. The first (60 percent of the time) is to function as the as the Annex 15 COTR which involves the monitoring of the operation, maintenance and repair of mechanical and HVAC systems by the BOSC. The second (40 percent of the time) is to inspect, test and certify all installation, maintenance and repair work performed by contractors on all VTE equipment.

A key consideration in determining the series of a position is the "paramount requirement" of the position. OPM defines "paramount requirement" as the essential prerequisite knowledge, skills and abilities needed to perform the primary duty or responsibility for which the position was established. Both of the major duties of the appellant's position have equipment design and characteristics as the primary knowledge and skill requirement. The Equipment Services Series, GS-1670, covers two-grade interval positions that supervise, lead, or perform administrative work that involves collecting, analyzing, interpreting, and developing specialized information about equipment. Work also involves providing advisory services to those who design, test, produce, procure, supply, operate, repair, or dispose of equipment. Work may also involve developing or revising equipment maintenance programs. The work requires applying an intensive and practical knowledge of the characteristics, properties, and uses of equipment. Knowledge is of the type gained from technical training, education, and experience in functions such as repairing, overhauling, maintaining, constructing, or inspecting equipment. The appellant's position has comparable duties and responsibilities and knowledge requirements. It is properly included in the GS-1670 series.

The Engineering Technician Series, GS-802 includes technical positions that require primarily application of a practical knowledge of the methods and techniques of engineering or architecture; and the construction, application, properties, operation, and limitations of engineering systems, processes, structures, machinery, devices, and materials. Engineering Technicians perform technical engineering functions which involve the solution of technical problems that require primarily application of a practical knowledge of the methods and

techniques by which materials natural resources and power are made useful. In contrast, the paramount requirement for the appellant's work is an in-depth knowledge of equipment to determine if contractor-performed operation, maintenance, installation, and repair work meets specifications and requirements.

The General Business and Industry Series, GS-1101 covers all classes of positions the duties of which are to administer, supervise, or perform (1) any combination of work characteristic of two or more series in the GS-1100 group where no one type of work is series controlling and where the combination is not specifically included in another series; or (2) other work properly classified in this group for which no other series has been provided. The appellant's work does not meet either of the stated conditions for placement in this series as it is not characteristic of two or more series and it is properly covered by another series.

We concur with the agency's series and title determination. The published GS-1600 JFS must be used for grade level determination in evaluating the appellant's position.

Grade determination

The GS-1600 JFS is in the Factor Evaluation System Format (FES). Under the FES, positions are evaluated by comparing the duties, responsibilities, and qualifications required with nine factors common to non-supervisory General Schedule positions. A point value is assigned to each factor in accordance with the factor-level descriptions. For each factor, the full intent of the level must be met to credit the points for that level. The total points assigned for the nine factors are converted to a grade by reference to the grade conversion table in the standard. Our analysis of the appealed work follows.

Factor 1, Knowledge required by the position

This factor measures the nature and extent of information or facts a worker must understand in order to do acceptable work and the nature and extent of skills needed to apply this knowledge.

At Level 1-6, the work requires knowledge of, and skill in applying, principles, concepts, and methods of equipment, facility, or service operations sufficient to design projects that have applicable precedents or plan approaches to perform assignments using well-established occupational methods, techniques, processes, and precedents. At this level employees determine facility or equipment overhaul, maintenance, restoration, or repair needs, prepare plans and specifications for alterations at a facility, prepare a statement of work and serve as the contractor representative to ensure compliance with the contract. They draft instructions and step-by-step procedures for operation, maintenance, and modification of assigned equipment.

Level 1-6 is met. Comparable to this level, the appellant plans and carries out surveillance and oversight and inspection and certification functions. He ensures that the BOSC personnel operate, maintain, and repair mechanical and HVAC systems in accordance with contract requirements and specifications. The appellant is also responsible for inspecting, testing and certifying the installation, maintenance and repair work performed by contractors for new and existing VTE systems, subsystems, and related fire protection systems. The objectives of this

work are specific and well defined. They are to ensure assigned equipment reliability, safety, and conformance to specifications, codes, and regulations. Problems are straightforward and are usually identified and isolated during the inspections that the appellant conducts or witnesses during testing procedures conducted by contractors. The appellant also identifies problems through review of maintenance records to assess the adequacy of the work performed and compliance with applicable codes and regulations. The problems he encounters are generally resolved by adapting or varying from established methods, procedures, and precedents. The appellant has a thorough knowledge of maintenance, operations, and safety related to the assigned systems and subsystems. This level of knowledge is used in providing technical information to contractors regarding specifications and requirements that must be met during evaluations of the work performed and in developing and discussing statements of work to be performed with customers and officials at the facilities where the equipment is located.

At Level 1-7, the work requires knowledge of, and skill in applying, a comprehensive range of principles, concepts, and practices concerning equipment, facility, or service operations with complicated technical requirements that have no clear precedent or plan such as specialized equipment in worldwide use or a facility containing a chiller system with an industrial size heater. At this level, the work requires knowledge sufficient to oversee and implement a program involving the identification and resolution of difficult issues or problems such as developing maintenance concepts, including forecasting usage rates, establishing initial repair and replacement factors or determining equipment, facility, or service deficiencies and appropriate resolution.

Level 1-7 is not met. The work performed by the appellant does not require knowledge of the range of concepts, principles, and practices typical of this level. The appellant performs quality surveillance of contractor performed operation, maintenance, and repair of mechanical HVAC and VTE systems. The appellant is required to have a thorough knowledge of the various types and classes of mechanical and HVAC systems and VTE found at the installation. The technical requirements for the operation, maintenance, and repair of these systems are generally well-established and standardized. The systems do not involve the degree of complexity or lack of precedents or require activities such as developing maintenance concepts as described for this level.

Level 1-6 is credited for 950 points.

Factor 2, Supervisory controls

This factor considers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility, and the review of completed work.

At Level 2-3, the supervisor outlines or discusses possible problem areas and defines objectives, plans, priorities, and deadlines, and provides guidance for unusual situations that do not have clear precedents. The employee independently plans and carries out the assignments in conformance with accepted policies and practices, and adheres to instructions, policies, and guidelines in exercising judgment to resolve commonly encountered work problems and deviations. The supervisor or designated employee reviews completed work for conformity with

policy and effectiveness. The methods and procedures used to complete assignments seldom require detailed review.

Level 2-3 is met. The appellant is responsible for independently planning and carrying out his assignments under the administrative supervision of the Supervisory Contract Surveillance Representative. The appellant works within established guidelines to achieve desired results, resolves most problems that arise, and coordinates his work with that of others in related activities. The supervisor is apprised of controversial issues or crucial matters. The supervisor stated that he does not provide technical supervision to the appellant and issues him work received from the Contracting Officer. Completed work is reviewed for adequacy and conformance with established policies and procedures.

At Level 2-4, the supervisor outlines overall objectives and available resources, and discusses timeframes, scope of the assignment, including possible stages, and possible approaches with the employee. The employee determines the most appropriate principles, practices, and methods to apply in all phases of assignments, interprets regulations on his/her own initiative, and applies new methods to resolve complex and/or intricate, controversial, or unprecedented issues. The employee also resolves most of the conflicts that arise and keeps the supervisor informed of progress and of potentially controversial matters. The supervisor reviews completed work for soundness of overall approach, effectiveness in meeting requirements or producing expected results, the feasibility of recommendations, and adherence to requirements.

Level 2-4 is not met. The appellant does not have the degree of independence of action in carrying out assignments as described at this level. He does not determine the appropriate principles, practices, and methods to apply to all phases of his assignments, or apply new methods to independently resolve controversial or unprecedented issues and problems. The appellant's work is performed with available guidelines and issues and problems which are controversial in nature are referred to the supervisor for resolution. The supervisory review of completed work is in terms of its adequacy and adherence to established policies, practices, and procedures rather than soundness of approach, or effectiveness in meeting requirements.

Level 2-3 is credited for 275 points.

Factor 3, Guidelines

This factor covers the nature of the guidelines used and the judgment needed to apply them.

At Level 3-3, the employee uses a wide variety of agency policies, regulations, precedents, and work directions; however, they are not always directly applicable to issues and problems or have gaps in specificity. Precedents are available outlining the preferred approach to more general or day-to-day problems or issues. The employee uses judgment to interpret, modify, and apply available guidelines to specific problems or issues.

Level 3-3 is met. Guidelines available to the appellant include a variety of Department of the Navy, Naval Facilities Engineering Command (NAVFAC), and Submarine Base acquisition quality assurance instructions, policies, regulations and procedural guides, pertinent technical

references, Federal Acquisition Regulations, Occupational Safety and Health Administration standards, government pricing guides, technical manuals; and national standards (National Electrical Code, National Fire Protection Association, American National Standards Institute, American Society of Mechanical Engineers, etc.). Additional guidance is contained in manufacturers' manuals, engineering plans, drawings and specifications. Although the guidelines and standards are fairly detailed, they do not specifically address every situation that the appellant encounters during the course of carrying out his assignments. Based on his knowledge of the mechanical and VTE systems and subsystems, his training, experience, and analyses of inspection and testing results, the appellant uses sound, seasoned judgment in adapting the guidelines to resolve problems.

At Level 3-4, employee uses policies and precedents that are very general in nature. Policies specific to assignments are often scarce or of limited use. The employee uses judgment, initiative, and resourcefulness in deviating from established methods or researching trends and patterns to develop new methods and criteria, propose new policies and practices, and significantly modify existing equipment.

Level 3-4 is not met. The record shows that the appellant does not routinely encounter situations where available guidelines are so general in nature as to be of limited use. The guidelines available to him cover the majority of his work. He does not regularly encounter highly complex or unusual problems that require him to routinely deviate from established methods, or research trends or patterns to develop new methods and criteria, or propose new policies as would be creditable at Level 3-4. Responsibility for the development of new criteria or new policy proposals lies at NAVFAC and higher levels of the agency.

Level 3-3 is credited for 275 points.

Factor 4, Complexity

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing work.

At Level 4-3, Work consists of different and unrelated processes and methods in completing assignments or projects. The employee analyzes and researches problems, issues, or relationships, and chooses a course of action from many alternatives. The employee identifies and discerns the interrelationships of conditions and elements to perform assignments such as scheduling maintenance, landscaping, printing, or food services based on weather, equipment or supplies needed, expense, and/or probable outcome.

Level 4-3 is met. The appellant's work requires the application of a variety of established techniques, procedures and guidelines related to accomplishment of his quality assurance surveillance responsibilities for the installation's mechanical systems. Typical of Level 4-3, these duties require the appellant to perform a variety of different and unrelated tasks requiring analysis and selection of a course of action from many alternatives. He reviews contractor documentation related to the installation, operation, maintenance, and repair of systems to ensure

the validity and proper method of accomplishing these tasks. The appellant consults with engineers and other technical personnel to develop plans and specifications for contractor provided services, develops performance work statements and government cost estimates when necessary, prepares inspection schedules, performs in-process and after-process inspections, prepares documentation of inspection observations, etc. His work includes certifying contractors' work on new and existing VTE systems/subsystems and fire protection systems. He is responsible for establishing and maintaining all required records, reports, certifications, testing data, and inventory related to VTE. He determines the effectiveness and reliability of the maintenance work, approves the use of standard and interchangeable parts, and verifies the speed and operational safety of VTE. The appellant reviews technical and industrial requirements for the repair, refurbishment and modification of VTE and certifies that all required tests have been performed and passed as required by codes, standards, policies, and regulations.

At Level 4-4, work consists of a variety of duties requiring many different and unrelated processes and methods involving equipment, facilities, and services. The employee assesses unusual conditions, varies approach to assignments, and decides how to perform assignments based on incomplete or conflicting data. The employee applies seasoned judgment and skill to interpret considerable data, plan work, or modify methods and techniques used to perform assignments such as scheduling repair or replacement of equipment, supplies, or parts of facilities due to aging, change in usage, unanticipated damage, or modernization.

Level 4-4 is not met. The appellant does not perform assignments requiring the application of many different and unrelated processes and methods where unusual conditions must be assessed, or decisions regarding what must be done are based on incomplete or conflicting data. The equipment that the appellant is responsible for is largely conventional in nature with well established operating, maintenance, and repair procedures and requirements. The range of methods, processes, and approaches that the appellant uses in carrying out his assignments is more limited as previously discussed and are not comparable to the broad range of unrelated processes and methods envisioned at Level 4-4.

Level 4-3 is credited for 150 points.

Factor 5, Scope and effect

This factor covers the relationship between the nature of the work and the effect of work products or services within and outside the organization.

At Level 5-3, work involves analyzing and solving a variety of conventional problems or issues involving one or more types or categories of equipment, facilities, or services. Work affects the design or operation of services, systems, programs, and equipment.

Level 5-3 is met. The principal purpose of the appellant's position is to function as the COTR for his assigned annex and perform quality surveillance of the operation, maintenance and repair of mechanical and HVAC systems by the BOSCO. As the only certified VTE inspector at the installation, he is also responsible for managing and administering the VTE program. This involves inspecting, testing, and certifying that new or existing VTE systems and subsystems

meet applicable operational and safety codes and perform in a manner that meets the needs of users. As at Level 5-3, his work is primarily concerned with detecting and resolving a variety of conventional issues and problems common to mechanical, HVAC and VTE systems and subsystems that affect the safe and reliable operation of this equipment. These problems typically result from deficiencies in equipment design, installation, repair, testing, and maintenance procedures. The appellant communicates his assessments of the adequacy of the work performed by contractors to the Contracting Officer. The problems or situations encountered are equipment specific and are generally detected and resolved through following established design review, inspection, and operational testing criteria and procedures. As at Level 5-3, his work affects design or operation of systems and equipment.

At Level 5-4, the work involves analyzing long-range needs, unusual problems, or unusual questions, and administering entire programs and operations, or phases of large and complex programs and operations. Work affects a wide range of agency concerns, or the operation of other agencies.

Level 5-4 is not met. The appellant's responsibilities do not routinely involve the performance of analyses of long-range needs, unusual conditions, or questions, administering entire programs or phases of large complex programs. These functions are the responsibility of organizations at higher levels in his agency, including NAVFAC, which provide technical guidance on matters related to facility maintenance and appraisal of maintenance programs. His work is primarily concerned with ensuring that the contractor's operation, maintenance and repair of mechanical and HVAC systems and VTE comply with contract specifications and requirements and meet applicable codes and regulations. The appellant's work does not directly affect a wide range of concerns within his agency, or the operation of other agencies. Instead, his work affects the users of the mechanical and HVAC systems, and VTE at the installation.

Level 5-3 is credited for 150 points.

Factor 6, Personal contacts and Factor 7, Purpose of contacts

These factors include face-to-face contacts and remote dialogue, e.g., telephone, email, and videoconferences, with persons not in the supervisory chain and the reasons for making those contacts.

Personal contacts

At Level 3, the highest level described for this factor, contacts are with individuals or groups from outside the agency, including consultants, contractors, vendors, or representatives of professional associations, the media, or public interest groups, in moderately unstructured settings. This level may also include contacts with agency officials who are several managerial levels removed from the employee when such contacts occur on an ad hoc basis. Individuals must recognize or learn the role and authority of each party during the course of the meeting.

The appellant's personal contacts meet but do not exceed Level 3. He has regular and recurring contacts with maintenance contractors and their employees, engineers, technicians, craftsmen

and other employees in his own and other organizations at the installation. He also has regular contacts with customers and officials and other personnel of the supported tenant commands located on the installation under the conditions typical of Level 3.

Level 3 is met.

Purpose of contacts

At Level b, the purpose of contacts is to plan, coordinate, or advise on work efforts, or to resolve issues or operating problems by influencing or persuading people who are working toward mutual goals and have basically cooperative attitudes. Contacts typically involve identifying options for resolving problems.

Level b is met. The appellant establishes contacts to secure compliance with contractual requirements, explain contract procedures and specifications, inspect conformance with contract terms, and exchange information regarding deficiencies or problems and methods of correcting or resolving problems, etc. He also has technical contacts to inspect and witness contractor testing, determine the adequacy of maintenance work in ensuring the safe and reliable operation of VTE. These contacts are typically with parties who are cooperative and working towards the mutual goal of complying with contractual requirements.

At Level c, the purpose of contacts is to influence and persuade persons or groups to accept and implement findings and recommendations. May encounter resistance as a result of issues such as organizational conflict, competing objectives, or resource problems. Must be skillful in approaching contacts to obtain the desired effect; e.g., gaining compliance with established policies and regulations by persuasion or negotiation.

Level c is not met. The record shows that the appellant does not have regular and recurring contacts involving influencing, persuading, or negotiating with persons or groups to accept and implement findings and recommendations, or gain compliance with policies or regulations. The appellant refers controversial issues to his supervisor.

Level b is met.

Factors 6 and 7 meet Level 3b for 110 points.

Factor 8, Physical demands

This factor covers the requirements and physical demands placed on the employee by the work assignments. This includes physical characteristics and abilities and the physical exertion involved in the work.

At Level 8-2, the work requires some physical exertion such as long periods of standing, recurring bending, crouching, stooping, stretching, or reaching. The work also may require lifting moderately heavy equipment or other items weighing less than 50 pounds, such as small hydraulic pumps and laundry supplies.

Level 8-2 is met. The appellant's duties routinely involve extended periods of standing and walking and recurring bending, crouching, stooping, kneeling, ladder climbing and stretching.

At Level 8-3, the work requires considerable strenuous physical exertion such as frequently climbing tall ladders, lifting heavy objects weighing 50 pounds or more, crouching or crawling in limited space, and defending oneself and others against physical attack.

Level 8-3 is not met. The appellant's supervisor estimated that the appellant performs work on rooftops requiring climbing tall ladders, primarily caged ladder-ways, approximately 50 to 60 times per year. He also performs approximately 65 elevator inspections, tests, and certifications which at times require working in an elevator pit seven to eight feet high. The elevator work does not meet level 8-3 physical demands in that it is not comparable to crouching or crawling in limited space. The ladder climbing approaches Level 8-3 physical demand, but by itself is not continuous and strenuous. The intent of this level is *considerable and strenuous* physical exertion caused by activities having several physical demands with each of them requiring the same or comparable exertion as those identified at this level. The appellant's work does not involve multiple Level 8-3 physical demands. For example, he does not frequently climb ladders while balancing heavy objects, and crouch and crawl in limited spaces while performing equivalent physically demanding tasks.

Level 8-2 is credited for 20 points.

Factor 9, Work environment

This factor considers the risks and discomforts in the employee's physical surroundings and the safety regulations required.

The position meets but does not exceed Level 9-2 which is the highest described for this factor. At this level, the work involves regular and recurring exposure to moderate risks and discomforts associated with production areas, such as working near operating machinery, moving vehicles, and cranes; working in dry docks, on and around scaffolding, close to high noise levels from engine test facilities, and near a variety of types of electrical hazards. The work situation requires the employee to be continually alert and to take special safety precautions, including wearing special protective items of clothing. As at this level, the appellant's duties involve regular and recurring visits to construction and maintenance areas. The work involves exposure to high voltage industrial plant equipment, working in areas around moving electrical and hydraulic elevators and automotive lifts, and on rooftops exceeding three stories in height. The appellant is required to use items such as safety glasses and shoes, a hard hat, a safety harness, and in some instances, a respirator.

Level 9-2 is credited for 20 points.

Summary

<i>Factor</i>	<i>Level</i>	<i>Points</i>
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1. Knowledge required by the position	1-6	950
2. Supervisory controls	2-3	275
3. Guidelines	3-3	275
4. Complexity	4-3	150
5. Scope and effect	5-3	150
6.and7.Personalcontactsand Purpose of contacts	3b	110
8. Physical demands	8-2	20
9. Work environment	9-2	20
<i>Total</i>		1,950

A total of 1,950 points falls within the GS-9 point range of 1,855 to 2,100 in the GS-1670 standard.

Decision

The appellant's position is properly classified as Equipment Specialist, GS-1670-9.