

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

Chicago Field Services Group
230 South Dearborn Street, Room 3060
Chicago, IL 60604-1687

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

Appellant: [appellant], et al.

Agency classification: Electronics Mechanic
WG-2604-11

Organization: Ground Communications Section
Mission Systems Branch
Communications Squadron
Support Directorate
Air National Guard Wing
[location] National Guard
National Guard Bureau
Department of the Air Force
[name] Air National Guard Base,
[location]

OPM decision: Properly assigned to the
Federal Wage System

OPM decision number: C-2604-00-03

/s/ Marta Brito Pérez

Marta Brito Pérez
Associate Director
Human Capital Leadership
and Merit System Accountability

July 8, 2004

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 jobs 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 Job Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

PERSONAL
[appellant 1]
[address]
[city and state]

PERSONAL
[appellant 2]
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Introduction

On December 15, 2003, the Chicago Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a group pay category appeal from Messrs. [appellants]. The appellants currently occupy identical additional jobs, hereinafter referred to as job, graded as Electronics Mechanic, WG-2604-11. They believe that their job should be in the General Schedule and classified as Information Technology (IT) Specialist, GS-2210-11. The appellants work in the Ground Communications Section (SCMG), Mission Systems Branch, Communications Division, Support Directorate, # Air National Guard Wing, [location] National Guard, National Guard Bureau, Department of the Air Force, at [name] Air National Guard Base (ANG), [location]. We received the complete agency administrative report on December 29, 2003. [appellant 1] was designated to represent the group of three appellants. This pay category appeal has been accepted and decided under section 5103 of title 5, United States Code (U.S.C.).

Background

On June 29, 2003, an official position change resulted in the downgrade of the lead appellant, [name], from Electronics Mechanic, WG-2604-12 (CPD-#####), to Electronics Mechanic, WG-2604-11 (new CPD-#####). The other two appellants, whose previous jobs were graded as Electronic Mechanic, WG-2604-11, were officially reassigned to the new job description (JD) at the same time. On July 21, 2003, the appellants submitted a group appeal to their servicing human resources (HR) office at [name] ANG, based on classification inconsistency. They requested an explanation of the inconsistency to the classification of a title 32 position co-located in same shop and attached a copy of a position description (PD) classified as IT Specialist, GS-2210-11 (Agency PDCN #####, CRA #####, dated 04 Oct 01). On July 30, 2003, [location] Air National Guard Headquarters, # Wing at [name] ANG Base, forwarded the group appeal to the Classification Appeals Adjudication Section, Defense Civilian Personnel Management Service (CPMS), [location], in accordance with DoD 1400.25-M Subchapter 551 Appendix A.

On October 16, 2003, the Chief, Classification Appeals Adjudication Section, CPMS, issued a classification appeal decision. The decision denied the appeal, determined that the correct pay plan for the appellants' job was the Federal Wage System (FWS), graded it as Electronics Mechanic, WG-2604-11, and stated that the decision was not subject to further appeal within DoD. The decision constituted a DoD classification certificate that was binding within all DoD offices. The cover letter, addressed to the National Guard Civilian HR Officer at [name] ANGB, instructed "all offices to ensure that all identical, similar, and related positions serviced by his office are classified consistently with this decision."

The appellants subsequently filed an appeal with OPM's Chicago Field Services Group, stating that "The big reason for this group appeal action is due to fact that shop also includes 3 each Title 32s who have already been reclassified to the Information Technology Specialist #####, GS-2210-11 series and the performance of duties are no different between the Title 32s and Title 5s within this section."

General issues

The appellants and their immediate supervisor say that the current JD (CPD-#####) is an accurate statement of the major duties, knowledge, skills, abilities, responsibilities, physical, and performance requirements of the job and its organizational relationships. The appellants claim classification inconsistency because their shop includes three title 32 Guard employees, who they contend perform duties no different than theirs, but who are classified as IT Specialists, GS-2210-11.

By law, we must grade Federal Wage system jobs based on comparison to OPM's Job Grading Standards (JGS's) and guidelines (5 U.S.C. 5346). We must classify General Schedule (GS) positions solely by comparing current duties and responsibilities to OPM's position classification standards (PCS's) and guidelines (5 U.S.C. 5106, 5107, and 5112). Since the comparison to standards is the exclusive method for grading jobs or classifying positions, we cannot compare the appellant's job to others as a basis for deciding their appeal.

Explicit in the appellants' rationale is a concern that their job is classified inconsistently with other positions. Like OPM, the appellant's agency must grade jobs and classify positions based on comparison to OPM standards and guidelines. Section 511.612 of 5 CFR requires that agencies review their own classification decisions for identical, similar, or related positions to ensure consistency with OPM certificates. In light of the appeal decision issued by CPMS on October 16, 2003, which required a consistency review of title 5 jobs in all affected DoD offices, we have requested that CPMS ask the National Guard Bureau to conduct a consistency review of the IT Specialist, GS-2210-11, position encumbered by title 32 employees within the appellants' work section at Selfridge ANG Base and any similar, identical, or related positions.

Job information

To help decide this appeal, we conducted a telephone audit with two of the appellants (Messrs. [appellants] on March 18, and interviewed their first-level supervisor, [supervisor's name], on March 19, 2004. In deciding this appeal, we carefully considered the audit and interview findings and all information of record furnished by the appellants and the agency. We find that the JD of record (CPD #####) contains the major duties and responsibilities assigned and performed by the appellants and we incorporate it by reference into this decision.

The appellants work under the general supervision of the Radio/Computer Supervisor, GS-2210-12. The primary purpose of the SCM Branch is to support the operations of the Communications Division, including:

- 1) the Office of the Director of Communications which coordinates with Air Force, MAJCOMs, NGB, and Wing Flying units to procure, distribute, maintain, and replace requirements for all telecommunications infrastructure.
- 2) the Plans Branch (SCX) which plans, implements, delivers, and maintains IT systems to satisfy all customer operational needs utilizing a vast array of computer, network, and communications solutions.
- 3) the Information Systems Branch (SCB) which has operational responsibility for all networking and fixed telecommunications systems; and

- 4) the Audio/Video Production Branch (SCS) which is responsible for all the photography and videography functions.

The appellants state that their work involves projects and new requirements in communications and information technology that places their job in the General Schedule (GS). They say that very little of their work requires discrete component repair, but does require developing, engineering, and implementing information technology solutions based on customers' concepts, ideas, and requests. The appellants state that they support a variety of networking hardware including routers, servers, switchers, and work stations. They say that they configure, research, test, and verify the functionality of telecommunications equipment and information technology that they support and install. They state that their customers present requirements to them for capabilities such as the Warrior Network, a distant learning network provided through teleconferencing with one way video and two-way audio. They say that they must search catalogs and contact suppliers to find equipment that will meet their customers' needs and fit into their operational environment. Based on customer requests, they must recommend and cost out the type of equipment to purchase, verify vendor claims through testing, design the configuration of the equipment and installation of lines for the customers' work spaces, and test the installations. Other examples of customer needs that they have provided include installing a base paging system, a voice over internet protocol for [name] and [name] operations, section networks interfacing with the base network, and command post network equipment.

The appellants state, and their supervisor agrees, that about 35 percent of their work involves "working the point" on new construction projects. They describe this work as developing technical solutions and resolving system problems (e.g., meeting constraints of network system security) between the customers and the contractors concerning radio, audio, computer, and video requirement needs being supplied in new construction. Their supervisor states that they must be familiar with agency policy to insure they can proceed to see what is available and if it is cost effective. He says that some of these decisions are based on the use of checklists supplied by program specialists responsible for program planning. He notes that the maintenance tasks performed by the appellants account for only 25 percent of their work. The appellants say that repair work has become minimal in the last few years because it is now more efficient to replace parts in communications and computer equipment rather than repair them. Little labor is involved since most systems are covered by warranty. Most repairs are made by vendors or contracted out. The installation of new equipment has also become more prevalent in updating obsolete computer equipment and reduces the need to repair such equipment and the maintenance of these systems is also provided by contractors while the equipment is under warranty.

Pay category determination

The first step in the position classification/job grading process requires that a pay category determination be made (Sections 5101, 5102, and 5103 of 5 U.S.C.). Section 5102(c)(7) exempts from the GS, employees in recognized trades or crafts, or other skilled mechanical crafts, or unskilled, semiskilled, or skilled manual-labor occupations, and other employees in jobs having trade, craft, or laboring experience and knowledge as the paramount requirement. *The Introduction to the Position Classification Standards* (PCS's) defines paramount requirement as the essential, prerequisite knowledge, skills, and abilities and qualification

requirements needed to perform the primary duty or responsibility for which the job has been established. If a job clearly requires trade, craft, or laboring experience and knowledge to perform its primary duty, the job is under the Federal Wage System (FWS). A paramount requirement does not rely on percentages of work time.

The appellants state that the paramount requirement for their work is knowledge of Information Technology (IT) concepts, principles, and methods to plan, analyze, configure, test, and recommend purchases for the network assets. The Information Technology Management Series, GS-2210 PCS, covers two-grade interval administrative positions that manage, supervise, lead, administer, develop, deliver, and support IT systems and services. This series covers only those positions for which the paramount requirement is knowledge of IT principles, concepts, and methods; e.g., data storage, software applications, networking, etc. While information technology includes computers, network components, peripheral equipment, software, firmware, services, and related resources, the term itself refers to systems and services used in the automated acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, assurance, or reception of information. This does not describe the appellants' duties and responsibilities. The appellants are not involved in managing the information itself. The GS-2210 PCS covers positions that require knowledge of electronic theory in controlling and moving bits of information. In contrast, the appellants' work requires trade knowledge of electronics principles and practices in determining customer needs including researching and recommending equipment for system compatibility and whether computer and peripheral equipment operating problems are hardware and/or software based. It requires trade skills and knowledge to install and test new equipment and make repairs, including replacing components.

The appellants' work falls within exclusion 18 of the JFS for Administrative Work in the Information Technology Group, GS-2200, which specifically excludes the following work from the 2200 group when that: "Work involves operating computerized analytical test and diagnostic equipment to install, test, troubleshoot, maintain, and repair electronic equipment that requires knowledge of the operational capabilities and limitations of electronic equipment and systems and skill in the use of computerized testing and diagnostic equipment." It further states that such work should be graded in an appropriate series within the Electronic Equipment Installation and Maintenance Family, 2600 FWS job family.

Illustrative of Electronic Equipment Installation and Maintenance Family, 2600, maintenance, repair, fabrication, and similar work is work in the 2604 Electronics Mechanic occupation. The 2604 JGS covers work in "Fabricating, overhauling, modifying, installing, troubleshooting, repairing, and maintaining ground, airborne, and marine electronic equipment, such as: radio; radar; sonar; cryptographic; satellite; microwave; micro computers and peripherals; laser; infrared; industrial x-ray; marine, aeronautical, and space navigation aid; TV receiver; surveillance; and similar devices. The work requires knowledge of electronic principles; the ability to recognize improper operation, locate the cause, and determine the best method to correct the defect; and the skill to disassemble, assemble, and adjust electronic equipment. The work includes using both manual and automated test equipment. The work may require the use of a personal computer and numerous software packages to program or realign various components or systems, download information, and detect equipment deficiencies."

The record shows that the appellants' equipment support duties and responsibilities require the application of similar FWS knowledge and skill. The appellants' "design work" is limited to meeting customer needs by making recommendations concerning equipment and configurations compatible with existing communications systems based on trades knowledge of equipment. It does not include designing the systems themselves. Though the appellants' "planning work" for installation includes an understanding of system requirements and specific user's needs plus placement of equipment, access to cables, and pre-testing for connectivity, the technical planning and design work is performed by the SCX Branch and higher NGB echelons.

The function of the SCMG Section is "to plan, implement, deliver, and maintain information technology systems to satisfy all customer operational needs utilizing a vast array of computer, network, and communication solutions. It also works with the acquisition, operations, technical acceptance, installation, testing, modification, and replacement of information technology equipment, services, and systems to support base organization missions and provides for customer services in support of programs essential to state ANG daily operations, training, and readiness missions." The appellants' JD describes the knowledge and skills essential to the job as, "Practical knowledge of electronic principles and scientific theory with formulas such as circuit elements, digital logic, microprocessors, core memory, interface circuits, digital data transmission, microwave, antennas, signal behavior, amplification, and display to perform analysis, integration, interoperability, and diagnose conflicts in complex electronic ground communications operational systems consisting of numerous complex integral components and where circuit theory must be used to understand the operation of individual circuits, and the possible interaction of other circuits which create a malfunction."

The appellants' primary and paramount duties flow from the mission and function of the organization in which they work. The primary purpose of the appellants' job as stated in the JD is to plan, implement, procure, deliver, operate, perform technical acceptance, integrate, test, modify, replace, and promote information technology systems to satisfy all customer operational needs utilizing a vast array of computer, network and communications solutions. The primary responsibilities of the job are the configuration, diagnosis, installation, maintenance, modification, and repair of a variety of electronic systems. While the tasks of the appellants' job have changed over the years along with the evolution of technology whereby the "replacement of equipment" has increasingly substituted for the "repair of equipment," the basic purpose of the job remains the same. The job is still responsible for installing, testing, and maintaining system hardware equipment, and for resolving system malfunctions, either by repairing, or more frequently, by replacing worn or faulty equipment, components, or parts. Coverage by the FWS still applies to the work because the appellants continue to apply a practical knowledge of electronic equipment, computer hardware, and operational software in installing, testing, and maintaining equipment for the operation of the communication systems. The customer support provided consists of integrating equipment, diagnosing hardware problems, and replacing hardware. Diagnostic equipment, including diagnostic software, is used to resolve problems. This duty requires the use of electronic principles and theory to understand design concepts, operations, and hardware compatibility for the primary purpose of correcting problems and optimizing various systems, not to design systems or solve engineering problems.

The paramount knowledge required by the job and deemed necessary to perform work on a variety of electronic equipment and systems is not of the principles and concepts of information technology as described in the GS-2210 PCS, but rather a practical knowledge of electronics used for repair and installation of electronic equipment as covered by the FWS. In addition, the decisions and recommendations made when “working the point” are also based on a practical knowledge of the existing communication systems. Some of these decisions are based on the use of checklists supplied by program specialists responsible for program planning. The networking they perform is still hardware networking. It is not the type of networking described in the 2210 PCS dealing with making decisions on IT systems’ design needs. The overall nature and purpose of the job is support work which clearly requires trade experience and knowledge to perform its primary duties to install, maintain, and repair equipment in complex electronic ground communications operational systems. Since the paramount requirement for the appellants’ primary duties is trade and craft knowledge, the work is exempt from the General Schedule and assigned to the Federal Wage System.

Decision

The appellants’ job is properly covered by the FWS.