

**U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs**

Chicago Oversight Division
230 South Dearborn Street, DPN 30-6
Chicago, Illinois 60604

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

Appellant: [appellant]

Agency classification: Air Traffic Assistant
GS-2154-7

Organization: Department of the Army
U.S. [location] Center
G-3/Directorate of Plans, Training and
Mobilization, Aviation Division
[name] Branch
[city and state]

OPM decision: Air Traffic Assistant
GS-2154-7

OPM decision number: C-2154-07-04

/s/

Douglas K. Schauer
Classification Appeals Officer

May 1 2001

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:

[appellant's name]
[address]
[city and state]

Agency:

[name and address of servicing personnel]
[office]

Mr. David Snyder
Deputy Assistant Secretary
Civilian Personnel Policy
U.S. Department of the Army
Pentagon, Room 23681
Washington, DC 20310-0300

Introduction

The appellant is currently classified as an Air Traffic Assistant, GS-2154-7, located in the [station] Center, G-3/Directorate of Plans, Training and Mobilization, Aviation Division, [name] Branch, [city and state]. The appellant's current position description was classified by the agency on October 1, 1999. The appellant was previously assigned to a position description which had been classified to Air Traffic Control Specialist (Station), GS-2152-9, but was downgraded to Air Traffic Assistant, GS-2154-7, subsequent to a Civilian Personnel Management System (CPMS) Field Advisory Service (FAS) Advisory Opinion issued July 29, 1998, pertaining to his position. The appellant contends that his position should be classified as Air Traffic Control Specialist (Station), GS-2152-9. The appellant and the supervisor have certified to the accuracy of the position description.

General Issues

The appellant's former position description was rewritten primarily to reflect Airfield Duty Officer responsibilities which were being performed by the appellant but were not included in his position description of record. The appellant is currently assigned to position number [#] which reflect the performance of those duties.

The appellant contends that he performs essentially the same work as positions classified as Air Traffic Control Specialist (Station), GS-2152-9, at other military installations. By law, we must classify positions solely by comparing their current duties and responsibilities to OPM standards and guidelines (5 United States Code (USC) 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others as a basis for deciding his appeal.

The appellant also believes that by virtue of a definition of "air traffic controller" in Title 5 USC, section 2109, he should be classified as an Air Traffic Controller, GS-2152. The law (section 5107 of Title 5, USC) requires that positions be classified solely in conformance with standards published by OPM. Section 5109 of title 5, USC shows those positions that are classified by statute, and it does not include Air Traffic Controller. Consequently, the position will be classified by comparison with and in conformance with published OPM Position Classification Standards.

Position information

The appellant works the midnight shift at [location] Army Airfield to provide a range of pilot assistance duties involving preflight and en route responsibilities. He also functions as the Airfield Duty Officer during periods that the Air Traffic Control Tower is not open. The appellant receives and processes flight plans from pilots, reviews them for accuracy, and provides assistance in making corrections when necessary. When needed or requested, he provides flight planning assistance which may involve recommending alternate routes or other flight plan changes. He provides information to pilots on airfield conditions and restrictions, weather situations and warnings, Notice to Airmen (NOTAMs), Navigation Aids (NAVAIDS) status, and related items. He reviews and coordinates procedures for flight following, noise

abatement, and sensitive areas to be avoided. He maintains various publications, informational material, and forms for pilot use. He issues to pilots instrument flight clearances for departures when received from [location] Approach Control and he formulates and issues NOTAMs information on equipment outages to ensure air traffic controllers and pilots are aware of such outages. He coordinates aircraft arrivals and facilitates passenger and crew transportation.

The appellant's in-flight assistance responsibilities include operating UHF/VHF air to ground equipment; providing weather information; receiving and processing requests for flight plan changes and providing information on local, en route, and destination airfield conditions; providing airport advisory services during the times when the [location] Army Airfield air traffic control tower is closed; providing assistance to aircraft in distress; and initiating search and rescue procedures on overdue aircraft.

The appellant has responsibility for monitoring and ensuring operation of a variety of systems that include the Terminal VHF Omni Range, Non-directional Beacon, Primary and Secondary Crash Alarm Telephones, Bullion Depository Hot-Line, NOTAMS, Airfield Lighting system, Emergency Generator Activation Alarms, and Intrusion, Fire and Security alarm systems.

During hours that the Air Traffic Control tower is closed, the appellant serves as the Airfield Duty Officer. His responsibilities include coordinating and directing airfield activities, maintaining airfield and aircraft security, developing and issuing NOTAMs, insuring safe runway conditions, evaluating weather conditions for impact on aircraft at the airfield, coordinating initial actions in response to any emergency situations until relieved by higher authority, approving/disapproving prior permission landing requests, coordinating aircraft parking plans, operating airfield lighting, making arrangements for VIP arrivals, notifying maintenance personnel of NAVAIDS outages, and coordinating utilities maintenance and facilities repair work orders.

The appellant works under the supervision of the Airfield Manager, a civilian position and a lead Air Traffic Assistant. The supervisor makes assignments primarily orally and also keeps employees informed of procedural changes through updates of Standard Operating Procedures reading files. The supervisor reviews the work through a review of various records and reports as well as through the monitoring of radio communications. The appellant works independently within parameters established for the work and in accordance with FAA and Army regulations and local policies and procedures. When the appellant is serving in the absence of the supervisor, i.e., functioning in the capacity of Airfield Duty Officer, the supervisor is accessible in the event of any situation requiring his attention.

Series and title determination

The appellant believes that his position is properly classified in the Air Traffic Controls Series, GS-2152. Specifically, the appellant believes that his position falls under the "station" specialization described in the GS-2152 standard. The "station" specialization pertains to positions concerned with: (1) the control of air traffic to insure the safe, orderly, and expeditious movement along air routes and at airports when a knowledge of aircraft separation standards and control techniques, and the ability to apply them properly, often under conditions of great stress,

are required; (2) the providing of pre-flight and in-flight assistance to aircraft requiring a knowledge of the information pilots need to conduct safe flights and the ability to present that information clearly and concisely; or (3) the development, coordination, and management of air traffic control programs.

According to the standard, Air Traffic Control Specialists in flight service stations brief pilots on weather conditions, advise on the existence or development of potentially hazardous weather conditions, suggest alternate routes, and, when appropriate, recommend that flights not be attempted. Based on knowledge of airway route structures and air traffic procedures, Air Traffic Control Specialists assist pilots in planning the route of flight, making flight computations, filing flight plans, and obtaining clearances to fly in controlled air space. They develop, disseminate, and monitor the currency of NOTAMs. They provide current and forecast weather data and flight planning information to en route aircraft and request and disseminate pilot reports of significant weather conditions. They also provide assistance to pilots who are lost or who are in an emergency situation, and they initiate search and rescue operations to locate aircraft failing to report their arrival within prescribed time limits.

Positions in the Air Traffic Control Series require an extensive knowledge of the laws, rules, regulations, and procedures governing the movement of air traffic. The GS-2152 standard identifies certain specific knowledges and skills required of Air Traffic Control Specialists in flight service stations. These knowledges and skills include:

- thorough knowledge of aviation weather including causes, effects, and dynamics of weather systems;
- ability to interpret and interpolate a variety of weather data into information useful to pilots;
- ability to determine the capabilities of a pilot to assure that the information presented is such that the pilot is aware of conditions expected and how they will affect the flight;
- detailed knowledge of the station's assigned area of responsibility, including operational features of assigned airports, location and performance characteristics of associated air navigational facilities, airway structures and routes, topography and factors affecting weather, air traffic control procedures pertinent to the area, applicable airspace restrictions, and emergency service procedures;
- detailed knowledge of procedures related to flight handling, routing, airways and airspace structures;
- general knowledge of the performance characteristics of a wide variety of aircraft;
- skill in communicating effectively with pilots of all level of experience in a variety of situations;
- ability to coordinate actions with other specialists and related air traffic facilities.

To be qualified for work in the Air Traffic Control Series, the GS-2152 qualification standard requires all persons in the GS-2152 series to possess an FAA certification for the type of facility where they are employed. The qualifications standard also requires applicants for positions in the GS-2152 series to meet certain physical standards.

The appellant performs work that is similar to the work described for the GS-2152 "station" specialization. For instance, the appellant reviews and records flight plans, advises on hazardous weather conditions, and provides assistance to pilots in emergencies. However, we find significant differences between the work of the appellant and the work described in the GS-2152 standard. For example, the appellant does not actually conduct pilot briefings on weather conditions; he relays weather updates and warnings to pilots. Pilots receive pre-flight weather briefings twice a day from weather service personnel via closed-circuit television monitors. The appellant does not provide weather information to en route aircraft, and he does not provide assistance to lost pilots. Although the appellant reviews completed flights plans for adequacy, he typically does not actively assist pilots in the planning of flights.

There are also significant differences in the knowledges and skills required by the appellant as compared to the standard. To perform the weather-related duties, the appellant does not analyze and interpolate weather data, and he is not required to understand the causes and dynamics of aviation weather to the extent described in the GS-2152 standard. He is not required to perform flight computations or to have knowledge of operating characteristics of a wide variety of aircraft. The appellant's position does not require FAA certification for flight service stations, and his position does not require him to meet the physical requirements specified by the GS-2152 qualification standard. Consequently, we find that the appellant's position is not properly classified in the GS-2152 series.

We find that the Air Traffic Assistance Series, GS-2154, to be the most appropriate series for the work of the appellant. The GS-2154 series covers work performed to support air traffic control. Positions in this series require knowledge and skill to apply air traffic control procedures, but they do not require the in-depth knowledge of air traffic control functions described in the GS-2152 standard. Positions in the GS-2154 series do not require FAA certification and do not carry physical requirements. In accordance with the GS-2154 standard, the appellant's position is properly classified as Air Traffic Assistant, GS-2154.

Grade determination

The GS-2154 standard does not provide criteria to determine grade level. The standard instructs the classifier to use other standards providing grade level criteria for similar kinds of one-grade interval work. The GS-1341 Meteorological Technician Series covers work that requires practical and technical knowledge and that is performed to collect and disseminate meteorological information. The work performed by the appellant is similar to that described in the GS-1341 series in that both involve the collection and dissemination of information based on practical and technical knowledge. We find that Part II of the GS-1341 standard provides reasonable criteria to determine the grade level of the appellant's position.

The GS-1341 standard uses two factors to determine grade level. These factors are Responsibility and Complexity.

Responsibility

This factor covers the kind and degree of supervisory, technical, and administrative controls over the work. Specifically, the factor measures the responsibility for making recommendations and decisions, the extent of personal contacts and commitment authorities, and the availability of guides. The factor describes three levels, covering a range extending from the limited responsibility found at Level I to extensive responsibility at Level III.

At level II, the supervisor provides instructions concerning new procedures, departures from established work practices, and any anticipated complications. The supervisor checks the technician's work to ensure that the critical aspects of the work have been completed satisfactorily and that any decisions and recommendations made are appropriate. Personal contacts at Level II usually involve the collection or presentation of technical information that is mostly factual and straightforward, although some interpretation or supplementation to meet user requirements may be involved. The technician makes recommendations and decisions that involve routine matters adequately covered by available guidelines or precedents.

We find that the appellant's work meets Level II. The appellant works within established FAA and Army regulations and standards and within standard operating procedures established by his installation. The appellant is not authorized to significantly deviate from these procedures without obtaining supervisory approval, except in emergency situations when a supervisor is not available. The supervisor spot checks the appellant's work, as described at Level II of the factor. In his contacts with pilots, the appellant gives factual information covered by established procedures. For example, he reviews flight plans for completeness and accuracy, and recommends changes when necessary (e.g., if a pilot plans to enter an established airway at an unauthorized altitude the appellant will point this out to the pilot and recommend an alternative). He provides pilots with updated weather reports.

Level III of the factor differs from Level II primarily in increased freedom from technical supervision; added requirements for the planning and scheduling of assignments; and additional demands for resourcefulness and technical judgments to interpret or adapt guidelines, instructions, and precedent material. At Level III, the supervisor provides very general instructions concerning broad objectives and provides general advice on unusual conditions and administrative matters. The technician receives little or no technical assistance. The supervisor's review of the work typically consists of an overall evaluation of adequacy and timeliness.

The relative freedom from technical supervision typically found at Level III includes work situations requiring, on either a fixed or rotational basis, the performance of work when supervision is entirely absent or not readily available. Level III responsibility covers, but is not limited to, situations where technicians make unreviewed decisions alone on a shift, e.g., to provide warnings of hazardous weather based on their judgment concerning the effect of changes in weather elements. Technicians decide whether to confirm warning conditions by waiting for additional reports or to alert concerned public officials immediately. Personal contacts at Level

III typically are extensive and important, constitute a significant aspect of the work, and usually involve the presentation and discussion of complicated technical material that requires considerable supplementation, interpretation, or elaboration to meet user requirements. The technician makes recommendations and decisions that are technically complex. Instructions and informational materials are usually available but are complicated and require interpretation or adaptation in their application to specific work assignments. In many instances, however, demanding production or operational requirements may preclude or severely restrict the practical availability of these guides.

We find that the work of the appellant does not meet Level III. Although the appellant receives little or no technical supervision in the course of his daily assignments, his work is covered by published regulations, standards, and operating procedures that are directly applicable to the work. The appellant does not deviate from these guidelines to any significant extent. Also unlike Level III, the appellant has a supervisor and a team leader who are accessible. Although the appellant exercises some judgment (e.g., as in determining when to provide weather warnings to pilots) that judgment is restricted to relaying factual information provided by others. The appellant has few opportunities to supplement or elaborate on the information provided. Similarly, he does not normally need to interpret or adapt guidance materials. We determine the Responsibility Factor to be properly evaluated at Level II.

Complexity

This factor measures the nature, variety, and difficulty of the work and the knowledges, skills, and abilities required to perform the work. This factor is described by six degrees, ranging from assignments of limited scope and difficulty at Degree A to complicated and technically demanding assignments at Degree F.

Work at Degree C involves considerable planning, scheduling of work sequences, and changing of plans while the work is in progress to adjust to conditions that could not be predicted adequately. The technician must plan and sequence his assignments, adjust or adapt work methods to the specific requirements of the assignment, and it involves using some judgment to determine what actions to take.

The appellant's work closely resembles Degree C in that, although the use of standardized procedures characterize the work, the appellant does use some judgment in determining appropriate actions. For instance, he reviews flight plans, and he must consider the experience of the pilot and the details of the flight plan in deciding how to provide assistance and information. Changing weather conditions and changes in the operational status of local navigation beacons may require him to make some modifications in procedures. His work requires him to adapt to changes in external conditions, e.g., flight training activities, air traffic, and weather.

At Degree D, the work is very technically demanding and requires considerable knowledge of work methods, techniques, procedures, and equipment. The work also requires technicians to apply seasoned judgment and keen skills. At Degree D, the work typically involves complicated methods, use of elaborate equipment or instrumentation, exacting data collection requirements,

or heavy public service schedules. Technicians at Degree D must use knowledge and judgment to determine how local conditions affect weather forecasts. They must consider reports and observations from various sources and consider whether to take action to protect life and property.

We find that the appellant's work does not meet Degree D. Unlike the degree of complexity described by Degree D, the judgment exercised by the appellant involves applying established regulations, standards, and procedures to specific situations that are directly related to these guides. Most of the decisions he makes while performing the work are based on these established guidelines rather than on the individual assessments. His data collection responsibilities involve the collection of flight plan information on prescribed forms and in prescribed formats which are normally completed by pilots and only reviewed by the appellant. Most of the judgments made by the appellant concerning the accuracy of flight plan information are based on FAA and Army requirements and on established airways. The work requires the use of more limited judgment than what is described at Degree D. Degree D describes work requiring judgment based on significant technical knowledge. The technician performing work at Degree D must determine how well technical information affects current information and then must identify appropriate actions to take. The appellant's work, however, primarily involves making judgments about whether information (e.g., flight plans) complies with established regulations and procedures and about what changes, if any, must be made to achieve compliance. We determine the Complexity Factor to be properly evaluated at Degree C.

Decision

According to the GS-1341 standard, the combination of Level II for Factor 1 and Degree C for Factor 2 equates to GS-7. The appellant's position is properly classified as Air Traffic Assistant, GS-2154-7.