

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

San Francisco Field Services Group  
120 Howard Street, Room 760  
San Francisco, CA 94105-0001

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

**Appellant:** [Name of appellant]

**Agency classification:** Telecommunications Manager  
(Spectrum/Frequency)  
GS-391-12

**Organization:** [Appellant's organization/location]  
Department of the Air Force

**OPM decision:** Telecommunications Manager  
GS-391-12  
(Parenthetical title at discretion of  
agency)

**OPM decision number:** C-0391-12-03

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Carlos A. Torrico  
Classification Appeals Officer

October 17, 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's name and address]

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## **Introduction**

On June 24, 2003, the San Francisco Field Services Group of the U. S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. On July 22, 2003, we received the agency's administrative report concerning the appeal. His position is classified as Telecommunications Manager (Spectrum/Frequency), GS-391-12, but he believes it should be classified at the GS-13 or 14 grade level. The appellant works in the [appellant's organization/location] Department of the Air Force. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

This decision is based on a thorough review of all information submitted by the appellant and his agency. In addition, an OPM representative conducted separate telephone interviews with the appellant and his supervisor to gather more information about the position.

## **Background information**

Prior to appealing to OPM, the appellant filed a classification appeal with the Civilian Personnel Management Service (CPMS), Department of Defense. In a decision dated [date of decision], the agency downgraded his position from the GS-13 to the GS-12 level classifying it as Telecommunications Manager, GS-391-12.

## **General issues**

In the file, the appellant commented on the classification review process conducted by his agency. By law, we must classify positions solely by comparing their duties and responsibilities to OPM position classification standards and guidelines (5 U.S.C. 5106, 5107, and 5112). In adjudicating this appeal, our only concern is to make our own independent decision on the proper classification of his position. Since comparison to standards is the exclusive method for classifying positions, and because our decision sets aside any previous agency decision, the classification practices used by the appellant's agency in classifying his position are not germane to the classification appeal process.

## **Position information**

Both the appellant and his supervisor have certified to the accuracy of the appellant's official position description (PD) [number], which canceled the former PD [number] as a result of the agency appeal decision. The primary purpose of the appellant's position is to serve as an expert in spectrum management by providing advice and technical assistance in support of all new and emerging [appellant's organization] acquisitions of communications and electronics equipment that are dependent upon the electromagnetic spectrum for operation. The position manages overall office efforts for rendering vital and expert consultative technical advice, opinion, and recommendations on unusually difficult and complex matters, which have a high level of public interest or public concern. The appellant serves as the [appellant's organization] member on various military and Federal government working groups, which implement frequency allocation policy, and participates in other groups that review, comment, and recommend allocation policy

for all Federal government systems. The appellant also spends 5 percent of his time supervising one employee.

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

The agency has classified the appellant's position in the Telecommunications Series, GS-391, titling it Telecommunications Manager (Spectrum/Frequency), and the appellant does not disagree. We concur with the agency's series and basic title determination. Agencies are authorized to supplement the basic title with parenthetical suffixes to identify the appropriate specialties within the GS-391 series. The grading criteria in the published position classification standard for the GS-391 series is directly applicable to the appellant's position and must be used for grade level determination.

The appellant spends about 5 percent of his time supervising one individual. However, that work occupies too small a portion of his time to meet the criteria for classification as a supervisor and evaluation of the work by application of the General Schedule Supervisory Guide (GSSG).

### **Grade determination**

The GS-391 standard uses the Factor Evaluation System (FES), which employs nine factors. Under the FES, each factor level description in a standard describes the minimum characteristics needed to receive credit for the described level. Therefore, if a position fails to meet the criteria in a factor level description in any significant aspect, it must be credited at a lower level. Conversely, the position may exceed those criteria in some aspects and still not be credited at a higher level. Each factor level has a corresponding point value. The total points assigned are converted to a grade by use of the grade conversion table in the standard.

The appellant disputes the agency's assignment of levels for Factors 1, 2, 3, 4, 5, and 7. He does not dispute the levels assigned for Factors 6, 8, and 9. After careful review, we concur with the agency's evaluation of those three factors, and have limited our discussion below to those in dispute.

#### *Factor 1, Knowledge required by the position*

This factor measures the nature and extent of information or facts that a worker must understand to do acceptable work, such as the steps, procedures, practices, rules, policies, theories, principles, and concepts; and the nature and extent of the skills needed to apply this knowledge.

At Level 1-7, an employee uses knowledge of a wide range of communications concepts, principles, and practices or in-depth knowledge in a particular functional area of telecommunications to accomplish work processes through using telecommunications devices, methods, services and facilities. This knowledge is also used to review, analyze, and resolve difficult telecommunications problems. The employee uses either a broad range or in-depth specialized knowledge of some or all telecommunications operating techniques, digital and analog communications requirements, local and wide area networking, and procedures used by Federal and industry organizations. Also required is knowledge of agency policy and, in some

cases, the policies of other agencies, and knowledge of sources of technical data necessary to evaluate alternative approaches for satisfying communications requirements. This knowledge is used to define, coordinate, plan, and satisfy user requirements for telecommunications equipment, systems, or services or is used in reviewing, developing, or interpreting communications policies and procedures.

Work illustrations at Level 1-7 include positions that interpret policy from higher organizational levels, develop local policy and implementing instructions, provide authoritative interpretations and guidance to management officials, and resolve issues involving conflicting telecommunications requirements. Employees at this level may also coordinate the objectives and plans of one or more specialized communications programs, develop procedures to cover multiple communications objectives, and serve as a management specialist on committees and work groups.

At Level 1-8, an employee is an expert in a major area of telecommunications specialization (e.g., data communications, frequency management, deployment planning, and network switching) or has demonstrated a mastery of general telecommunications policy, technology, and programs. The employee uses a comprehensive knowledge of communications policy requirements to function as a technical authority in assignments requiring the application of new theories, concepts, and developments to communications problems not susceptible to treatment by accepted methods, technology, or procedures. In addition to mastery of the specialty area, the employee at this level uses knowledge of his/her own and other telecommunications specialties to make decisions or recommendations to significantly change, interpret, or develop policies or programs. For program planning functions, employees use knowledge of scientific and technological advances in related fields of electronics and automation.

Work illustrations at Level 1-8 include positions responsible for making decisions and developing policies in very difficult assignments such as planning for significantly new or far-reaching telecommunications program requirements, or leading or participating as a technical expert in interagency groups for resolving problems in existing telecommunications systems and programs requiring innovative solutions. Another involves planning, organizing, and directing studies to develop long-range (e.g., 5+ years) studies and forecasts and advising top level agency telecommunications and subject-matter managers on applying new developments and advances in telecommunications techniques in the specialty area.

The appellant's position meets Level 1-7 but falls short of Level 1-8. Like Level 1-7 the appellant uses a comprehensive knowledge of spectrum frequency management and related laws, regulations, policies, directives and agreements to manage his program for the [appellant's organization]. He applies a broad range of frequency management knowledge, and must be familiar with the policies and procedures used by other Federal, State, and private industry organizations. The appellant provides program guidance to installation managers and coordinates and responds to user requirements to resolve equipment and systems problems, and interprets agency policies and procedures. He makes recommendations to eliminate frequency shortcomings while maintaining maximum operational capabilities. Consistent with the illustrative work examples, he serves as the [appellant's organization] command representative for frequency telecommunications working groups or committees, the purpose of which is to

coordinate or develop solutions to operational problems and to recommend changes in policies and regulations to higher Air Force or other Federal agency levels based on needs and services. He also interprets and supplements agency level policy for application at the installation level, and develops procedures to cover multiple telecommunications program objectives.

Level 1-8 is not met. The appellant believes that he meets Level 1-8 because he is "...the single civilian expert in a major area of telecommunications specialization, e.g., frequency spectrum management at the command" and that he frequently consults with higher-level frequency management authorities, organizations, and Headquarters Air Force personnel to provide recommendations on spectrum issues that significantly change national-level policy or the interpretation of guidance with respect to radio frequency standards and regulations, and that affect long range development or space systems. We recognize that the appellant participates on interagency groups and is considered an expert at his installation on the regulations and requirements of the spectrum frequency management program, and may be consulted by higher organizational levels (e.g., Air Force Frequency Management Agency) on draft policies and regulations. However, as opposed to the appellant's position, the intent of Level 1-8 is to credit those activities where the employee applies knowledge to assignments requiring the application of new theories, concepts and developments to telecommunications problems not susceptible to treatment by accepted methods and procedures. Although the appellant may have to handle complex issues, interpret program laws and regulations, and identify and recommend changes to guidelines, he is not faced with applying new theories and concepts, and his program responsibilities are limited to spectrum frequency management at the local command operating level as they relate to the space and missile systems program. We do not find that the appellant's position meets the intent of the illustrative work examples listed under Level 1-8, particularly those dealing with advising top level agency telecommunications and subject-matter managers on new developments in telecommunications, or evaluating and making recommendations on overall plans for the agency and interagency programs.

This factor is evaluated at Level 1-7 and 1250 points are credited.

### *Factor 2, Supervisory controls*

This factor covers 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 2-4 the supervisor sets overall objectives and resources available, but the employee is responsible for planning and conducting the work, resolving conflicts, integrating and coordinating work with others, and interpreting policy. The employee plans and performs the work, resolving most conflicts that arise, integrates and coordinates the work of others as necessary, and interprets and applies policy on his/her own initiative in terms of established objectives. The supervisor is kept informed of progress, potentially controversial matters or unusual conditions with far-reaching implications. Completed work is reviewed from an overall standpoint in terms of feasibility, compatibility with other work, or effectiveness in meeting requirements or achieving expected results.

At Level 2-5, the supervisor provides administrative direction with assignments in terms of broadly defined missions or objectives. The employee is responsible for planning, designing, and carrying out major studies or projects, and for coordinating with experts both within and outside the organization. Results of the work are considered technically authoritative and are normally accepted without change. If work is reviewed, the review is concerned with such matters as meeting objectives, effect of advice on the overall requirements, or precedents which might apply to other programs. Recommendations for new projects and alteration of objectives are usually evaluated for such considerations as availability of resources, broad goals, or national priorities.

Level 2-4 is met. Like that level, the supervisor establishes the overall objectives, and the appellant independently exercises expertise in his specialty area (spectrum frequency management). He plans and carries out his duties, resolving conflicts and integrating the work with other specialists as necessary. The supervisor is kept informed of potentially controversial or unusual issues. Work is reviewed for fulfillment of overall program requirements.

Level 2-5 is not met. Unlike that level, the supervisor provides more than just administrative direction for assignments. The record shows that the appellant does not have responsibility for planning, designing, and carrying out major studies or projects, or performing the coordination needed with internal and external experts. While he is responsible for spectrum frequency studies within his installation, major studies or projects are performed at the agency level, with the opportunity for the appellant to provide input for the studies. The appellant's work receives closer review than that described at Level 2-5.

This factor is assigned Level 2-4 and 450 points are credited.

### *Factor 3, Guidelines*

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

At Level 3-4, guidelines provide a general outline of the concepts, methods and goals of telecommunications programs. Those regularly applied are not specific in how they are to be defined, applied and monitored. In some cases available guidelines are purposefully open to local interpretation. The employee exercises initiative and resourcefulness in researching trends and patterns, to deviate from traditional methods, and to implement new and improved communications methods and procedures. Assignments at this level may also include responsibility for developing guidelines for use by telecommunications specialists at the same or lower levels in the organization.

At Level 3-5, guidelines are nonspecific and stated in terms of broad national or departmental policies and goals, often in obscure technical terminology which necessitates extensive interpretation to define the extent and intent of the coverage. At this level the employee is a recognized technical authority on the development and interpretation of communications guidelines, policies, legislation, and regulations covering one or more substantive communications programs and the organizations which administer them. At this level the employee must use initiative, judgment, and originality in researching and interpreting existing

national policies and legislation, in determining when new or revised legislation is needed, and in researching and preparing recommendations for the content of such legislation. He/she takes into account the effects of conflicting laws, policies and regulations, and they develop or recommend communications policies and regulations that are flexible enough to remain current in meeting program objectives.

Level 3-4 is met. The appellant uses various national and international laws, DoD and Air Force policies, directives, instructions, manuals, program documents, architecture documents, and established engineering and analytical principles for determining systems capabilities and emerging technology advances/direction. Many are nonspecific so he researches and interprets them, and may recommend changes as required. The appellant interprets and coordinates related policy, planning, and operations documents involving Air Force weapon systems and exercises independent judgment in making recommendations to implement agency spectrum engineering analysis and certification procedures. He shows initiative and resourcefulness in extending or redefining guidelines for use at the installation, and ensures compliance and compatibility of the spectrum frequency program.

The position does not meet Level 3-5. Unlike that level, the appellant's guidelines are more specific than just statements of broad national or departmental policies and goals requiring extensive interpretation. While he is locally recognized as an authority on spectrum frequency management, he does not develop regulations or communications policies, or determine when new or revised legislation is needed and prepare recommendations on proposed changes or revisions. These are functions vested at higher echelons in his agency.

This factor is evaluated at Level 3-4 and 450 points are assigned.

#### *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 the work.

At Level 4-5, assignments involve various projects, studies, or evaluations requiring the application of many different and unrelated processes, differing regulatory criteria and procedures, and significant departures from established practices. Work characteristically has conflicting requirements, the problems are poorly defined or require projections based on variable information or technological development, or some degree of change must be anticipated in mission requirements, related telecommunications systems, or funding requirements. Employees evaluate and introduce advanced equipment and techniques for which new criteria and guides must be developed. At this level, the employee makes recommendations for changes in basic policy issuances and for implementing instructions covering established communications techniques, practices, and methods based on personal analysis of very general policy directives and objectives. Decisions regarding what needs to be done are complicated by the number and nature of existing security controls, regulatory guidance, overlapping requirements, or organizational, environmental, or similar considerations that have an impact on the ability to apply established methods.

At Level 4-6, employees perform work which involves analyzing, planning, scheduling, and coordinating the development of legislation or telecommunications policy issuances that direct the course of telecommunications programs across organizational lines within Federal agencies or other organizations involved in providing telecommunications equipment and services for the Federal government. Typically, assignments having such characteristics involve participation, as an expert authority, or resolving problems or issues concerning several phases of telecommunications policy development and implementation for a variety of programs in one or more fields of telecommunications. Work at this level may also include problem-solving efforts as a member on interagency committees or in national telecommunications organizations involved in reviewing, analyzing, developing, and issuing national policy directives affecting telecommunications policies and programs throughout the government. Decisions and recommendations made by the employee require extensive consideration and analysis of very broadly defined, or undefined, issues and problems, often exploratory in nature, in areas where useful precedents do not exist and establishment of new concepts and approaches is required. The employee's actions require continuing efforts to establish concepts or programs, or to resolve previously unyielding problems in establishing and administering telecommunications programs.

Level 4-5 is met. The appellant serves as the point of contact for critical spectrum frequency issues where conflicting problems are involved, frequency requirements are not able to accommodate system needs, or where Command level interest is needed to facilitate processes. The work requires initiating significant departures from established processes or requirements to ensure that critical spectrum frequency issues are resolved. The appellant interprets national and DoD policy and executes procedures for the [appellant's organization] in order to effectively manage the radio spectrum frequency program. Similar to this level, he typically handles the most difficult spectrum frequency management problems arising at the [appellant's organization], and has primary responsibility for operation of the program. The appellant analyzes critical issues brought to his attention, conducts research, identifies criteria and requirements, and considers and recommends alternative approaches when feasible. He is called upon by the Air Force Frequency Management Agency as a technical expert on space/satellite acquisition issues to review and comment on proposed changes to existing spectrum policies, guidelines, and instructions. The appellant is designated as the single point of contact to resolve frequency coordination and use of frequency bands that are shared by the Department of Defense, National Oceanic and Atmospheric Administration (NOAA), and National Aeronautics and Space Administration (NASA) for space systems, and has collaborated on the writing and implementation of the coordination guidelines. As a member of various technical committees/organizations, he participates and represents the [appellant's organization] position on spectrum frequency issues, provides advice and recommendations, and collaboratively monitors and plans spectrum developments for future use while ensuring compatibility of spectrum frequency applications with instructions and procedures.

Level 4-6 is not met. The appellant believes that his participation as a technical expert in interagency groups merits this level. However, unlike Level 4-6 the appellant's work does not involve analyzing, planning, scheduling, and coordinating the development of legislation or telecommunications policy issuances that direct programs across organizational lines within

Federal agencies or other organizations involved in providing telecommunications equipment and services for the Federal government. The appellant does not operate at the highest organizational levels within his agency, and does not typically encounter assignments which require the application of new theory or technology, or other work described at this level. His work surfaces telecommunications issues, but development of program policies and processes are controlled by other components; e.g. AFFMA, National Telecommunications and Information Administration (NTIA), or the Office of the Assistant Secretary of Defense, Networks and Information Integration (OASD (NII)). Therefore, neither the appellant's organization nor his position may be credited with this responsibility. While he functions as a technical expert on behalf of the [appellant's organization] in groups/organizations, there is no evidence in the record that the appellant's decisions and recommendations require extensive consideration and analysis of very broadly defined, or undefined, issues and problems, often exploratory in nature, in areas where useful precedents do not exist and establishment of new concepts and approaches is required. Additionally, the spectrum frequency management program proposals and changes made by the appellant are not of the complexity envisioned at Level 4-6. His work, actions or decisions do not have the types of national-level implications on telecommunication policies characteristic of this level.

This factor is evaluated at Level 4-5 and 325 points are credited.

*Factor 5, Scope and effect*

Scope and effect covers the relationship between the nature of the work, i.e., the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

At Level 5-4, the employee is involved in investigating and analyzing a variety of unusual telecommunications problems, questions, or conditions associated with formulating projects or studies to substantially alter major telecommunications systems, or establishing criteria in an assigned area of specialization (e.g., establishing telecommunications operating instructions for wide area computer networks in a number of different locations), or evaluating the effectiveness of existing voice, data, and/or video systems. The work affects telecommunications operations, installation, and maintenance practices in a number of different functional operations within the organization and, to a lesser extent, in vendor operations. It contributes to developing solutions to telecommunications problems and questions, and in developing alternatives and options to meet requirements in a variety of physical and environmental circumstances. Program and project proposals frequently cut across component or geographic lines within the agency (e.g., across bureaus, commands, regions) and may also affect the budgets, programs, and interests of other Federal agencies or private industrial firms.

At Level 5-5, an employee is involved in such things as: isolating and defining issues or conditions where a number of project efforts or studies must be coordinated and integrated; resolving critical problems in agency wide systems; or developing new approaches and techniques for use by others. Employees serve as expert consultants in telecommunications policy for a broad area of communications requirements, in an area of specialization, or as project coordinators in carrying out one-of-a kind projects. Advice, guidance, or work results

affect developmental aspects of major telecommunications program definition and administration throughout the agency. Such work significantly affects the work methods to be applied by other telecommunications specialists throughout the agency and sometimes in other agencies or vendor operations.

Level 5-4 is met. The appellant's work involves planning, developing, and executing the [appellant's organization] telecommunications spectrum frequency management program plans, and resolving unusual telecommunications problems at the installation. He provides program officials advisory, planning and technical services in designing approaches resolving spectrum frequency availability and application problems which support operational weapon and information systems. Program offices rely on his interpretation of telecommunication frequency policy, and how it should be implemented in order to minimize any impact to the cost, schedule and performance of the spacecraft program. His work affects telecommunications operations, installation, and maintenance practices at the facility, and helps to develop solutions to local communications problems and achieve program objectives.

Level 5-5 is not met. The record shows that the appellant's work is not involved in isolating and defining issues or conditions where numerous project efforts or studies must be coordinated and integrated, or resolving critical problems in agency wide systems. Level 5-5 involves staff-oriented assignments where the employee is responsible for program and policy development. The work at this level directly affects the development of major aspects of telecommunications definition and administration throughout the agency, and the work methods to be applied by other telecommunications specialists in the agency and sometimes in other agencies. The appellant has no responsibilities of that nature. Rather, his program responsibility and advisory services directly affect spectrum frequency management and administration throughout the [appellant's organization]. He does not develop new approaches and techniques for use by others as intended at this level. He manages an operating-level command program, providing support and guidance to representatives at various [names of local offices]. The appellant's work does not affect the activities of other telecommunications specialists as required at this level, i.e., at the agency or department level or at a regulatory agency responsible for issuing standards and instructions to be implemented by other telecommunications staff.

This factor is evaluated at Level 5-4 and 225 points are credited.

#### *Factor 7, Purpose of contacts*

Factors 6 and 7 are closely related. The factor levels are assigned by matching the level of recurring personal contacts with their directly related purpose. The purpose of contacts, Factor 7, must be directly applicable to those personal contacts described and credited for Factor 6. The agency assigned Level 7-b but the appellant believes Level 7-d is appropriate.

The purpose of the employee's contacts at Level 7-c is to influence, motivate, interrogate or control persons or groups. At this level the persons contacted may be fearful, skeptical, uncooperative or dangerous. Therefore, the employee must be skillful in approaching the individual or group in order to obtain the desired effect, such as gaining compliance with

established policies and regulations by persuasion or negotiation, or gaining information by establishing rapport.

The purpose of the employee's contacts at Level 7-d is to justify, defend, negotiate, or settle matters involving significant or controversial issues. The work usually involves active participation in conferences, meetings, hearings, or presentations involving problems or issues of considerable consequence or importance. The persons contacted typically have diverse viewpoints, goals or objectives, requiring the employee to achieve a common understanding of the problem and a satisfactory solution by convincing them, arriving at a compromise, or developing suitable alternatives.

Like Level 7-b, the appellant meets with some people who have basically cooperative attitudes, and influences them to abide with spectrum frequency management requirements. However, his position exceeds Level 7-b and fully meets Level 7-c since his contacts regularly require him to deal with individuals and groups who may be skeptical and uncooperative, requiring him to persuade and negotiate in order to gain compliance with directives and procedures both within and outside the installation. Although the appellant participates in conferences and meetings, unlike Level 7-d he is not faced with justifying, defending or settling matters concerning significant or controversial issues. Such issues are addressed at higher agency command levels where they are referred for resolution.

Factors 6 and 7 are assigned Level 3-c and a total of 180 points are credited.

#### *Summary of FES factors*

<i>Factor</i>	<i>Level</i>	<i>Points</i>
1. Knowledge required by the position	1-7	1250 points
2. Supervisory controls	2-4	450 points
3. Guidelines	3-4	450 points
4. Complexity	4-5	325 points
5. Scope and effect	5-4	225 points
6. and 7. Nature of contacts/Purpose of contacts	3-c	180 points
8. and 9. Physical demands/Work environment	1-a	<u>10 points</u>
<i>Total</i>		2890 points

The total of 2890 points falls within the GS-12 range (2755-3150) on the grade conversion table in the standard. Therefore, the appellant's duties are graded at the GS-12 level.

#### **Decision**

The appellant's position is properly classified as Telecommunications Manager, GS-391-12. Assignment of a parenthetical title is at the discretion of the agency.