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

Dallas Field Services Group
Plaza of the Americas, North Tower
700 North Pearl Street, Suite 525
Dallas, TX 75201

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

Appellant:	[appellant]
Agency classification:	Electronics Engineer GS-855-12
Organization:	[name] Maintenance Office [name] Region Western Area Power Administration U.S. Department of Energy [location]
OPM decision:	Electronics Engineer GS-855-12
OPM decision number:	C-0855-12-01

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Robert D. Hendler
Classification and Pay Claims
Program Manager

August 22, 2005
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]

Human Resources Manager
[name] Customer Service Region
Western Area Power Administration
[HR office address]

Director, Human Resources Management
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Introduction

On February 28, 2005, the Dallas Field Services Group of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant], an employee of the [name] Maintenance Office, [name] Region, Western Area Power Administration, Department of Energy, in [city and state]. The position is currently classified as Electronics Engineer, GS-855-12. The appellant believes his assigned duties and responsibilities are more reflective of the GS-13 grade level. We received the agency's administrative report on March 14, 2005. This appeal has been accepted and decided under the provisions of section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant requested that his agency review the classification of his position. Their findings, reported to him on January 25, 2005, sustained the current classification. He believes his work is comparable to that described in a generic GS-855-13, position description (PD) found on his agency's Website. By law, we must classify positions solely by comparing their currently assigned duties and responsibilities to OPM standards and guidelines (5 U.S.C. 5106, 5107, and 5112). Since comparison to standards is the exclusive method for classifying positions, we cannot compare the appellant's position to others, which may or may not be classified correctly, as a basis for deciding his appeal.

In addition, a PD alone is not sufficient to make a classification determination. This is discussed in the *Introduction to the Position Classification Standards* (PCSs), which states that PDs for nonsupervisory positions should include enough information so that proper classification can be made when supplemented by other information about the organization's structure, mission, and procedures.

Position information

The [name] Maintenance Office is responsible for an assigned segment of the Region's electrical power distribution system that encompasses [state name], and portions of [three other states]. It is responsible for maintenance, replacement, and additions for assigned power system substations, switching stations, metering stations, high voltage transmission lines, communications, and other related facilities. The maintenance organization includes approximately 50 employees, primarily working in trades occupations such as high voltage electricians, linemen, and electronic equipment maintenance and repair occupations in four geographic locations. Two of these locations also have a GS-340-13, Field Maintenance Manager assigned and three have GS-850 Electrical Engineers assigned.

The appellant serves as staff assistant to the Division Maintenance Manager, a GS-340-14, who is responsible for the development and implementation of the maintenance program for that segment of the Region. As staff assistant, the appellant provides engineering and technical assistance, advice, and expertise in the management of the communication activities with responsibility for 55 to 60 unstaffed communication sites in [five states]. He develops and promotes comprehensive and effective maintenance and testing programs, methods, procedures,

safe work practices, and related requirements for the microwave communications system, VHF and UHF radio network, power line carrier facilities, fiber optic equipment, and telephone equipment. The appellant advises on the need for changes and improvements and maintenance efficiency. He also assists in the selection of test equipment. The appellant assists in planning, organizing, and coordinating the work schedule for the operations and maintenance (O&M) crews as they perform regular preventative maintenance, periodic testing, emergency repairs, system modification and new construction.

The appellant meets annually and coordinates with the Region's communications staff to plan and discuss projects and three-year goals. The communications system is updated and brought up to code and new FCC standards on a continuous and rotating basis. The appellant and his counterparts report on the status of projects and are given assignments for new projects. He coordinates with the Regional staff on priorities and schedules in compliance with regional goals. The appellant keeps informed of O&M problems and performance records to make recommendations for modification of equipment. He prepares designs for system modifications or updates at the specific field sites, develops cost estimates and prepares specifications for the purchase of new equipment. The appellant conducts special investigations of conditions which interrupt service or result in accidents, and recommends corrective action to prevent their recurrence. He assists in the final inspection of facilities, coordinates the testing program with power and telephone companies, maintains maintenance program records and determines which electrical components and equipment must be stocked. He stays abreast of the latest equipment available by communicating with other utilities and manufacturing representatives.

The PD includes much more information concerning the duties and responsibilities of the position. The supervisor has certified the accuracy of the assigned PD # [number]. The appellant agrees that the PD is 80 percent accurate. He believes other documents that describe his duties should also be considered; i.e., his performance plan, the RMR Coordination Guidelines for J5500 and Division Communications, and an unsigned, undated U.S. Civil Service Commission Certificate of Medical Examination, SF 78, as used for positions in the Engineering Series (GS-800). The SF 78 addresses the functional requirements (physical requirements) and environmental factors that may apply to engineers working in a substation environment. He provided copies of these documents for the record as did the agency. We will consider these documents only to the extent that they explain and clarify the appellant's assigned duties and responsibilities. We find the PD includes the major duties and responsibilities of the position and we hereby incorporate it into our decision.

In making our decision, we have carefully considered all of the information of record provided by the appellant and his agency, including those additional documents cited by the appellant. In addition, we conducted a telephone audit with the appellant on April 19, 2005, and a telephone interview on April 21, 2005, with his immediate supervisor. To gain a better understanding of the agency's organizational structure and the responsibilities of the appellant, we also interviewed the supervisor of the Region's technical support office and two engineers from its communications/supervisory control and data system acquisition systems organization. These engineers have direct and regular interaction with the appellant. We conducted these interviews on April 26 and June 2, 2005.

Series, title, and standard determination

The GS-855 Electronics Engineering Series includes professional engineering positions which require primarily application of knowledge of (a) the physical and engineering sciences and mathematics, (b) electronic phenomena, and (c) the principles, techniques, and practices of electronics engineering. The agency placed the position in the GS-855 Series and the appellant does not contest this determination. We agree and find the position is properly allocated to the GS-855 Series and titled Electronics Engineer.

The appellant questions the agency's use of the Electrical Engineering, GS-850/Electronics Engineering GS-855, PCS for grade level determination, because it is written in narrative, two factor format while his PD is written in the Factor Evaluation System (FES) format that uses nine factors. He feels his position is not a good fit for evaluation by the GS-855 PCS, and believes the Primary Standard and the General Grade Evaluation Guide for Nonsupervisory Professional Engineering Positions, GS-800, should also have been used to evaluate his position.

Section 5107 of title 5 U.S.C., provides that each agency shall place each position under its jurisdiction in its appropriate class and grade in conformance with standards published by OPM or, *if no published standards apply directly,* consistently with published standards. Since there is a applicable standard that directly covers the work performed by the appellant, it is neither necessary nor appropriate to apply other PCSs.

The GS-850/855 PCS is written to apply to positions in both series. These two engineering fields are generally considered to be closely related. Generally, electrical engineering is concerned with energy transport (power) in an efficient manner (low energy loss); whereas electronics engineering is concerned with information transport (communication) in an efficient manner (low distortion). The duties of the appellant's position do not include functions which may require comparison with other grade-evaluation guides, such as research, test and evaluation, etc. The GS-850/GS-855 standard provides directly applicable evaluation criteria in functions such as design, installation, and maintenance and is properly used to evaluate the position.

The Primary Standard (PS) is the "standard-for-standards" which serves as a basic tool for maintaining alignment across occupations by assuring that grading criteria in PCSs for specific occupations are consistent. The intent is not to use it to evaluate individual positions. As indicated in *The Classifier's Handbook*, the PS may be used when a factor in an individual position significantly exceeds or fails to meet the lowest factor level defined in a specific FES occupational standard.

The FES system's nine factor format has become a common format for writing PDs. However, there are classification standards that use other formats. The GS-850/855 PCS uses a narrative format which addresses two factors, *Nature of assignment* and *Level of responsibility*. These two factors address multiple subfactors. The use of an FES PD format is not relevant to determining which PCS is used to evaluate a position. Properly written FES PDs provide sufficient information to allow the proper application of narrative standards for the purpose of grade level determination.

Grade determination

The GS-850/855 PCS uses two primary factors to determine grade level: *Nature of assignment* and *Level of responsibility*. Our evaluation with respect to those factors follows.

Nature of assignment

This factor deals with the nature, variety and purpose of duties performed; scope and difficulty of the assignments; knowledge required and the degree to which experienced judgment is required in evaluating alternative courses of action or diagnosing problems or failures; the extent to which the engineer must define the problem; and originality required.

GS-12 engineers apply deep and diversified knowledge to atypical or highly difficult assignments in a subject-matter or functional area, e.g., unusual problems that arise during the rework of major systems where they have technical responsibility. Precedents for their assignments are sometimes absent, but more commonly their relationship to the particular assignment is obscure. Conflicting issues often characterize GS-12 assignments. At the GS-12 level, engineers are required to fully comprehend the relationship between their assignments and related areas of engineering, e.g., installation or overhaul engineers may recommend structural changes to naval architects, civil engineers, etc. As they usually perform preliminary engineering analyses on large and complicated projects, they must be knowledgeable of research and development activities and technological advances in order to incorporate them into their assignments. Their approaches are followed by less experienced engineers. Some GS-12 engineers may coordinate and direct the work of other engineers and technicians for portions of broad tasks. They are relied on to evaluate various alternatives for meeting an objective and recommending the best one. In planning large systems, they conceive several configurations that may involve consideration of structural, mechanical and hydraulic features. Assignments are frequently complicated by the many operations which the equipment or systems must perform and the many variables to be considered.

In contrast, GS-13 engineers are highly knowledgeable specialists in their subject-matter areas which may be narrow or broad, or they may be authorities in a functional area such as standardization or maintenance. Other engineers and managers within their activities often consult them for advice and assistance within their areas of expertise. At the GS-13 level, engineers represent the activity in reaching engineering compromises and agreements with other organizations and contractors. They plan and coordinate programs which must be innovative and original. They make critical analyses and evaluations of the ramifications, advisability and impact of large engineering projects such as modification of major facilities or systems to meet new and more demanding performance requirements or new configurations with unusual combinations of equipment are called for and major compatibility problems must be resolved. GS-13 engineers are required to keep abreast of and evaluate new developments in their subject-matter areas. They maintain close contact with research and development laboratories, manufacturers, scientists and other Federal activities and must anticipate the implications of probable technological change on their programs.

Comparable to the GS-12 grade level, the appellant is responsible for providing engineering and technical assistance for the management of communications activities for the [name] Maintenance Office. Like illustration #3, his assignments include responsibilities for development of maintenance and testing programs for existing sites and systems, and participation in the planning for update, standardization, and/or modernization of those systems. Systems include those for microwave radio, fixed and mobile VHF and UHF radio, voice and data communications, electronic telephone systems, powerline carriers, fiber optic equipment, etc., supporting the mission of the Region. While project assignments for update/modification to the regional systems are made by the regional planning staff, the appellant provides input for those sites within his area of responsibility and develops site specific plans for those division-specific projects that are approved. As much of the work involves repairs or replacing parts to enable sites to operate until their turn for update or rebuild, the appellant works closely with the maintenance staff to determine the best approach to be taken. Like illustration #3 in the PCS, he monitors the systems to locate problems and determine how they may be corrected. Equipment may be repaired or modified to enable it to continue operation if it is not able to be replaced for budgetary or other reasons.

The GS-13 grade level is not met. The organizational structure and delegated authorities do not require or permit the appellant to represent the activity in reaching engineering compromises and agreements with other organizations as characteristic of the GS-13 grade level. While the appellant provides input and recommendations for projects, they are not of the major scale typical of the GS-13 level nor does he have the decision making authority to determine his site projects. The Region determines the projects and priorities for their overall system. The communications systems for which the appellant is responsible are but one segment of the Region's network. Illustration #2 describes planning modifications to complex subsystems or major category of equipment, e.g., switching or transmission equipment of an extensive nationwide communications network. This includes analyzing and evaluating requirements and recommending trade-offs, determining modifications to be made to salvageable equipment, translating subsystem plans into engineering tasks for an action agency, determining distribution of systems; resolving controversial interfacing problems with subsystems and maintaining liaison with the action agency to assure compliance with customer requirements. While there may be some surface similarities to the illustration, the appellant's assignments do not meet the scope and complexity described at the GS-13 level. The work in illustration #2 is reserved to and performed by higher level components of the appellant's agency.

The GS-12 grade level is credited.

Level of responsibility

This factor deals with the extent and depth of review given to completed work and guidance received while the work is in progress; the nature and purpose of personal contacts; the impact of findings, recommendations and advice; the authority to commit the activity or agency to a course of action; and the availability and relatedness of guidelines and precedents.

At the GS-12 grade level, supervisors inform engineers of objectives or operational requirements that the equipment or system must meet and relative priority of their assignments, but they are

free to analyze problems and develop individual approaches and work plans. They receive little technical advice or guidance. Technical manuals or specifications pertinent to their assignments are frequently inadequate. Work is reviewed for technical soundness and compliance with broad local or agency policy. They consult with their supervisors when they discover assignments will have significant unforeseen impact or they must depart from policy. Technical decisions are usually accepted by higher authority except when policy, program or budgetary considerations are overriding. They may speak for their activities, coordinate their assignments with engineers in other disciplines, and represent their offices in the exchange of data and discussion of technical problems at meetings. GS-12 engineers meet with customers' representatives and advise on means of meeting operational requirements. They point out areas for investigation where improvements or alterations result in large savings and improved efficiency.

At the GS-13 grade level, engineers have technical responsibility for their assignments and programs and supervisors and others readily accept their recommendations and decisions. They determine the approaches to be used and are responsible for the results. They keep the supervisor informed of the status of the work and discuss decisions involving critical changes or major controversial issues in policy and precedent determinations. Completed work is reviewed for compliance with overall policy and attainment of program objectives. GS-13 engineers have continuing contacts as engineering advisors and as representatives of their organization in interpretation and application of policies and requirements. They negotiate with engineers with differing or opposing views to resolve engineering aspects of controversial cases. GS-13 engineers normally resolve technical problems independently, even in areas where guidelines are lacking. They are regarded as knowledgeable advisors within their functions and specialty areas, and interpret the agency's national guidelines that pertain to their functional areas for application at their activities. They make and justify long-range and controversial proposals and defend their findings and recommendations against attack by top engineering personnel of manufacturers or other organizations.

Similar to the GS-12 grade level, the appellant receives direction from the Division Manager who assigns work in terms of program requirements, general objectives, and relative priorities for their completion. The appellant is responsible for planning and carrying out assignments and resolving problems that may occur, consulting with the supervisor on priorities, as required. Like the GS-12 level, the appellant's work is reviewed for adequacy and effectiveness in meeting objectives, soundness of decisions and recommendations, and compliance with policy. He has multiple guidelines available, most of which are general and must be adapted to deal with problems encountered. Contacts are with other engineers, trades supervisors, and trades workers in the Division, other engineers in the Region, and representatives of power and telephone companies to provide advice and coordinate work projects. He may represent the Division for the communications functions in meetings for planning and coordinating work and discussing problems.

The GS-13 grade level is not met. The appellant has project management responsibility only for the smaller division-specific projects such as replacement of equipment. The regional communications team retains responsibility for coordinating the budget requests, procuring bulk equipment, participating in design review, and providing assistance as requested in design and project management. While the appellant represents the division in communications matters, it

is not in the continuing role as engineer advisor interpreting and applying policies, requirements, and national guidelines as is typical of the GS-13 grade level. The organizational structure and delegated authorities preclude the appellant from independently resolving the technical problems of the GS-13 grade level scope and complexity.

The GS-12 grade level is credited.

Decision

With both factors credited at the GS-12 grade level, the appellant's position is properly classified as Electronics Engineer, GS-855-12.