

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

Philadelphia Oversight Division
600 Arch Street, Room 3400
Philadelphia, PA 19106-1596

**Classification Appeal Decision
Under Section 5112 of Title 5, United States Code**

Appellant:	[appellant's name]
Agency classification:	Copier/Duplicating Equipment Operator GS-350-4
Organization:	Defense Logistics Agency Defense Automated Printing Service Production Department [location]
OPM decision:	Peripheral Equipment Operator GS-350-4
OPM decision number:	C-0350-04-02

Robert D. Hendler
Classification Appeals Officer

/s/ 11/17/99
Date

As provided in section 511.612 of title 5, Code of Federal Regulations (CFR), 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 (PCS's), appendix 4, section G (address provided in appendix 4, section H).

Since this decision changes the classification of the position, it is to be effective no later than the beginning of the fourth pay period after the date of the decision (5 CFR 511.702). The servicing human resources office must submit a compliance report contained the corrected position description (PD) and a Standard Form 50 showing the personnel action taken. The report must be submitted with 30 days from the effective date of the personnel action.

Decision sent to:

[appellant's name]
[appellant' address]

Ms. Pamela M. Creek
Executive Director
Human Resources
Defense Logistics Agency
8725 John J. Kingman Road, Suite 3630
Fort Belvoir, VA 22060-6221

Ms. Nancy E. Ward
Director
Office of Human Resources
Defense Logistics Agency
Administrative Support Center
8725 John J. Kingman Road, Suite 0119
Fort Belvoir, VA 22060-6220

Introduction

On July 28, 1999, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. The position is classified currently as Copier/Duplicating Equipment Operator, GS-350-4, PD #L152804. The appellant requested his position be reclassified as Computer Operator, GS-332-6. The position is located in the Defense Logistics Agency (DLA), Defense Automated Printing Service, (DAPS), Production Department, [location]. We have accepted and decided this appeal under section 5112 of title 5, United States Code (U.S.C.).

General issues

The appellant makes various statements in his appeal about the adequacy of the installation's evaluation of his position. In a series of letters to [name], Director, Document Automation Manager, DAPS; [name], Northeast Regional Director, DAPS; and [name], Chief Operating Officer, DAPS, the appellant stated that on January 29, 1995, upon being transferred from the Defense Industrial Supply Center (DISC) to DAPS, his position, title, and occupational series were mistakenly changed from Computer Clerk, GS-335-3 to Copier/Duplicating Equipment Operator, GS-350-3. In addition to his earlier duties of breaking down and distributing reports, he was assigned the additional duties of operating a computer to identify, select, input, and monitor printing jobs, and to set up and operate a series of high speed printers and copiers. Effective August 20, 1995, the appellant was promoted to GS-350-4.

The appellant maintains the duties he has been performing for the past four years should be classified Computer Operator, GS-332-6. He believes his duties involve the responsibility to identify, select, and transmit reports to a high speed printer through a control computer console based on their priority, volume, and timeliness. He also believes the skills and abilities necessary to operate peripheral computer devices represent the major elements of his current position. He stresses that until the summer of 1997, he "worked without supervision."

In his letter of November 28, 1998, the appellant asked the agency to review the classification of his position. On March 25, 1999, the agency desk audited the appellant's position. In its letter of June 10, 1999, the agency concluded that the appellant's position was properly classified as Copier/Duplicating Equipment Operator, GS-350-4 based on the paramount qualifications required by the work, sources of recruitment and line of progression, the reason for establishing the position, and the background knowledge required. He received this response on June 24, 1999.

Implicit in the appellant's rationale is that the increase in the workload should support the reclassification and upgrading of his position. The assigning of more work, however, does not necessarily mean the additional work is more difficult and complex. All positions subject to the Classification Law contained in title 5, U.S.C., must be classified in conformance with published PCS's of OPM or, if there are no directly applicable PCS's, consistently with PCS's for related kinds of work. Therefore, other methods or factors of evaluation such as comparisons to other

positions that may or may not be classified correctly, e.g., the appellant's position before the addition of the above enumerated duties and responsibilities, are not authorized for use in determining the classification of a position. PCS grading criteria measure the difficulty, complexity, and responsibility of work, and the qualifications required to perform that work. The position classification process requires that we only consider the effect of properly performed work. Therefore, the appellant's comments regarding the potential impact of improperly performed work may not be considered in our evaluation of his position.

The appellant has stressed that his PD is not classified correctly. A PD is the official record of the major duties and responsibilities assigned to a position by a responsible management official, i.e., a person with authority to assign work to a position. A **position** is the combined duties and responsibilities that make up the work performed by an employee. Title 5, U.S.C., section 5106 prescribes the use of these duties and responsibilities, and the qualifications required by these duties and responsibilities, as the basis for determining the classification of a position. The Introduction to the PCS's (Introduction) further provides that "As a rule, a position is classified on the basis of the duties actually performed." Additionally, 5 CFR 511.607(a)(1), in discussing PD accuracy issues, provides that OPM will decide classification appeals based on the actual duties and responsibilities assigned by management **and** performed by the employee. The point here is that it is a real operating position that is classified, and not simply the PD.

The appellant refers to situations that occurred several years ago. However, 5 U.S.C. 5112 requires that we can only consider the current duties and responsibilities in classifying positions. Established OPM guidance requires that a representative work cycle be determined for establishing what work is characteristic of the work of a position for classification evaluation. Many positions handle a full work cycle within a period of weeks or months, e.g., processing travel claims or payroll. The appellant's position deals with a similar work cycle. Therefore, we may not consider work performed several years in the past in adjudicating this appeal.

The application of OPM PCS's must be accomplished within the confines of the position classification theories, principles, and practices established by OPM. The Introduction states that:

Some positions involve performing different kinds and levels of work which, when separately evaluated in terms of duties, responsibilities, and qualifications required, are at different grade levels. . . . In most instances the highest level of work assigned to and performed by the employee for the **majority of time** [emphasis added] is grade-determining. When the highest level of work is a smaller portion of the job, it may be grade controlling only if:

- The work is officially assigned to the position on a regular and continuing basis;

- It is a significant and substantial part of the overall position (i.e., occupying at least 25 percent of the employee's time); and
- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

The classification appeal process is a de novo review that includes a determination as to the duties and responsibilities assigned to the appellant's position and performed by the appellant, and constitutes the proper application of PCS's to those duties and responsibilities. We have evaluated the work assigned by management and performed by the appellant according to these requirements. We conducted an on-site audit with the appellant and an interview with his immediate supervisor, [name], on October 18, 1999. In reaching our decision, we carefully reviewed all information provided by the appellant and his agency, including the PD of record.

Position information

The appellant's primary duties are to set up, adjust, and operate the Xerox 4180 High Speed Printer with a TN3270 Dynacom Elite control computer console. The Xerox 4180 is a versatile high-performance printing system that processes and prints data from a variety of sources. It enables host mainframe computers and network-connected devices, such as workstations and graphic scanners, to produce publications and other documents, incorporating graphics, forms, logos, signatures, and a variety of fonts. The TN3270 Dynacom Elite control computer console is that part of the printing system that allows the operator to interact with the printer through a dedicated computer console interface.

The system is driven by a variety of commands or instructions sent from the DLA Columbus, OH mainframe and received on the TN3270 control console in [location]. The [location] systems manager can also input instructions. These commands describe the format of jobs to be run. The operator controls all processing and printing through keyboard commands, making changes when required. An experienced operator is required, i.e., one who has the knowledge and experience to change predesigned formats, Job Control Language (JCL) and Job Entry Commands (JEZ), using special coding techniques and features.

Our fact-finding revealed that the Xerox 4180 is not a computer within the meaning of the position classification system. It is a piece of peripheral equipment; a high speed printer, run off line from the DLA mainframe in Columbus, OH. The printer is controlled by commands transmitted through a dedicated microcomputer. Electronic data, representing reports, is initiated either by the DLA, Columbus, or the systems manager in Philadelphia, PA. The data appears as job listings on the computer console control monitor and selections are keyed in and transferred to the Xerox 4180 high speed printer. The Xerox 4180 is operated by entering a limited number of data items through menu prompts on the TN3270 monitor screen. The appellant keys in the appropriate

response to each screen message and enters commands through a mouse or certain keyboard combinations to identify, select, initiate, and monitor job flow.

The appellant's other duties are ancillary and secondary to his Xerox 4180 duties. The PD and other material of record furnish much more information about his duties and responsibilities and how they are performed and are hereby incorporated by reference into this decision.

Series, title, and standard determination

Based on the analysis that follows, we find the appellant's work is allocated properly to the Equipment Operator Series, GS-350, which covers positions that involve supervising, leading, or operating microfilm equipment, peripheral equipment, mail processing equipment, printing equipment, and duplicating equipment. We find the appellant's PD of record, #L152804, accurately reflects the major duties and responsibilities of his position. The Equipment Operator Series, GS-350, requires a knowledge of the operating characteristics of the equipment and controls, the skill and knowledge to set up and adjust the equipment and controls to produce acceptable products or services on a timely basis, and the skill to perform normal operator maintenance. The Xerox 4180 High Speed Printer with control console meets the definition of peripheral equipment as described in the GS-350 PCS; i.e., input/output devices operated on or off line such as high speed impact printers and computer form printers.

As noted in the GS-350 PCS, some equipment operated by positions in this series, particularly peripheral computer equipment and computer output microfilming equipment, involve functions that, on the surface, appear to be beyond the scope of this series. Nevertheless, operating such equipment is covered by the GS-350 PCS when the function performed is not dependent on computer programming or computer operating skills. As discussed previously in this decision, the operating functions assigned by management and performed by the appellant on the Xerox 4180 High Speed Printer computer control console do not entail the depth and breadth of computer programming or computer operating skills that exceed those found in the GS-350 series; i.e., following predetermined menu selection procedures to start up and operate a high speed printer, track its operations, and respond to clearly defined error messages for which there are a limited number of courses of action.

The GS-350 PCS recognizes circumstances in which peripheral equipment operation is an integral part of positions that operate the control console of a digital computer system, e.g., computer operator trainees who are taught to operate peripheral equipment in conjunction with their computer operator training. The Computer Operation Series, GS-332 PCS explains this distinction stating: "Positions involving the full-time operation of peripheral computer equipment or other related equipment in support of computer services" are classified in the Equipment Operator Series, GS-350. The purpose of the appellant's position meets this specific exclusion as discussed previously. Therefore, based on the titling practices contained in the GS-350 PCS, we find the appellant's position is allocated properly as Peripheral Equipment Operator, GS-350.

Grade determination

The GS-350 PCS is written in factor evaluation system (FES) format. Positions graded under the FES format are compared to nine factors. Levels are assigned for each factor and the points associated with the assigned levels are totaled and converted to a grade level by application of the Grade Conversion Table contained in the PCS. Under the FES, factor level descriptions (FLD) mark the lower end; i.e., the floor, of the ranges for the indicated factor level. If a position fails in any significant aspect to meet a particular level in the standard, the next lower level and its lower point value must be assigned unless the deficiency is balanced by an equally important aspect that meets a higher level.

Under the FES, each FLD 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 FLD 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. Our evaluation with respect to the nine FES factors follows.

Factor 1, Knowledge required by the position

Factor 1 measures the nature and extent of information or facts which the workers must understand to do acceptable work (e.g., steps, procedures, practices, rules, policies, theories, principles, and concepts) and the nature and extent of the skills needed to apply that knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

Level 1-3 (350 points), the highest level described in the GS-350 PCS, requires a thorough knowledge of equipment set up, adjustment, operating procedures, and a corresponding level of skill to set up, operate, and adjust the equipment. This knowledge enables a highly skilled operator to set up, operate, and adjust the equipment, and in addition, diagnose, solve, and correct routine operating problems affecting the quality and timeliness of the service or product. The operator may instruct lower graded operators on how to complete the required corrective adjustment. Typically, corrective adjustments performed require the operator to consider the symptoms, possible causes and remedies. When problems or malfunctions occur, the appellant is expected to interpret system diagnostic commands and take appropriate action for corrective purposes.

Our fact-finding revealed that a sufficient portion of the appellant's work time entails resolving the more demanding problems reflecting the application of Level 1-3 knowledge and skill. For example, the appellant is required to have the knowledge and experience to change predesigned formats (JCL and JEZ commands) using special coding techniques and features. The appellant's duties require establishing connection with DLA Columbus, which often involves correcting fiber-optic link settings, identifying, correcting, and reporting operational and link problems to systems

managers and/or DLA Columbus. When major hardware or software problems persist the appellant reports the problem to his immediate supervisor, systems manager, DLA Columbus, or DISC Mechanicsburg, PA, for assistance in resolving the problem. Therefore, we find that the appellant's position meets, but does not exceed Level 1-3 (350 points), the highest level described in the GS-350 PCS, and have so credited the position.

Factor 2 - Supervisory Controls

Supervisory Controls covers the nature and the extent of direct or indirect controls exercised by the supervisor, the operator's responsibility, and the review of completed work. Controls are exercised by the supervisor in the way assignments are made, instructions are given to the operator, priorities and deadlines are set, and objectives are defined. Responsibility of the employee depends upon the extent to which the operator is expected to work independently as instructed and the use of initiative in the performance of routine assignments. The degree of review of completed work depends upon the nature and extent of the review, e.g., close and detailed review of each phase of the assignment; detailed review of the finished assignment; spot check of finished work or work in process for accuracy.

We find that the work meets, but does not exceed Level 2-2 (125 points), the highest level described in the GS-350 PCS. At Level 2-2, the supervisor provides continuing and individual assignments by indicating generally what is to be done and the quantity and quality required to complete the assignment. The supervisor provides additional instructions for new or unusual equipment set ups, operations, or adjustments. Equipment operating problems and unfamiliar situations not covered by instructions or guidelines are referred to the supervisor for assistance or a decision. Since most machine operations are well established, the operator typically works independently and uses some judgment in correcting machine adjustments to improve or maintain quality of machine service, adjusting for variations in the work, or other similar situations. The work is reviewed for quality and compliance with guidelines by spot checks or selective sampling. In addition, the structure of the work provides a continuing form of review through successive machine operations and ultimately by the user of the service or product.

Fundamental to the rationale of the appellant is the freedom from supervision under which he believes he operates. He states that he is in a different building and on a different shift from his supervisor. He works a 12:00 midnight to 8:00 A.M., Sunday to Thursday shift with no supervisor on Sunday. As a fully skilled Xerox 4180 operator, the appellant receives printing assignments, and determines within existing parameters when to run them in order to meet production and priority requirements. This includes ending the current job and beginning another in order to deal with new priorities or other problems. The appellant's supervisor can access the system and change priorities and assignments at any time. The appellant suggests that the functions he performs and the initiative he exhibits shows that he works under minimal direct control.

Freedom from direct supervision alone does not control the crediting of this factor. As stated in the Classifier's Handbook, pages 24-25:

The nature and extent of review of positions range from close and detailed, to spot check, to general review. Note that it is not just the degree of independence that is evaluated, but also the degree to which the nature of the work allows the employee to make decisions and commitments and to exercise judgment. For example, many clerical employees perform their work with considerable independence and receive very general review. This work is evaluated, however, at the lower ends of this factor because there is only a limited opportunity to exercise judgment and initiative.

The limited nature and number of machine adjustments that the appellant can perform before the supervisor, DLA Columbus, DISC Mechanicsburg, or the systems managers are called, and the go/no go nature of the run decisions, limit the exercise of judgment and initiative vested in the position. The appellant's work is evaluated in terms of production required by the DAPS Production Standards and Pricing Manual, and by noting the number of customer end-users satisfied with the product. The appellant operates within guidelines, deadlines, computer commands or instructions sent from the DLA Columbus mainframe or the Philadelphia systems manager. Therefore, we find that the position meets, but does not exceed Level 2-2 (125 points), the highest level described in the GS-350 PCS, and have so credited the position.

Factor 3 - Guidelines

This factor covers the nature of guidelines and the judgment needed to apply them. Guides may include, for example, desk manuals, established procedures and policies, traditional practices, and reference materials such as dictionaries and operating manuals.

Our fact-finding revealed that the appellant works a substantial portion of the time with problems that reflect the application of guidelines typical of Level 3-2 (125 points), the highest level described in the GS-350 PCS. At that level, specific guidelines for doing the work have been established and are available to the appellant for reference purposes. The appellant must use judgment in selecting among and applying the appropriate methods to correct operating problems which affect the quality and/or timeliness of the product or service. Significant deviations or situations to which the guidelines do not apply are generally referred to the supervisor, DLA Columbus, DISC Mechanicsburg, or the systems manager.

The appellant uses various guidelines such as the Xerox 4180 Laser Printing System Operating Guide, the Ford Guide to High Speed Printers, SAMMS/RFF reference manuals and various operating manuals. Using existing information from various sources, an operating/training manual describing methods of production, processing, troubleshooting and distribution of DLA reports was *compiled* by the appellant for use in the DAPS production department; the content was

produced and controlled by others. The manual is subject to periodic updates as processes and technology change. The operating manuals, guides, and references are the primary guidelines. They can be somewhat incomplete requiring the appellant to use judgment in handling aspects of the work situation.

The more demanding troubleshooting requirements of the position reflect the exercise of judgment found at Level 3-2. Representative of work at Level 3-2 is working with the responsible parties in attempting to isolate and deal with operating situations that do not respond to normal operator manual solutions. Based on the nature of technical problems that cannot be resolved locally, solutions can be sought from Xerox Corporation, DLA Columbus, or DISC Mechanicsburg. These situations frequently occur on the night shift through which the appellant is assigned on a regular and recurring basis. Therefore, based on the trouble shooting requirements of the position we find that the position meets, but does not exceed Level 3-2 (125 points), the highest level described in the GS-350 PCS, and have so credited the position.

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.

We find a substantial portion of the appellant's work meets, but does not exceed, Level 4-2 (75 points), the highest level described in the GS-350 PCS. At that level, work consists of operating one or more pieces of equipment to perform the duties of the position, requiring the performance of several related duties and processes. The appropriate equipment set up and adjustments are determined by the operator after considering the nature of the product or service requested. There is generally a variety in the products or services produced and the necessary equipment set ups and adjustments are easily recognized. The variety of adjustments and set ups is limited for each piece of equipment operated.

As at Level 4-2, the appellant must possess a variety of technical knowledge to communicate with the Xerox 4180 High Speed Printer system. He must be able to restart processing and ensure job completion. Typical of Level 4-2, the appellant corrects error situations due to operating problems, defective materials, or improper set ups. He determines the corrective action after considering the problem, type of equipment, interpretation of system feedback, possible causes, and past experience in operating the equipment. Therefore, we find that the position meets, but does not exceed Level 4-2 (75 points), the highest level described in the GS-350 PCS, and have so credited the position.

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.

Scope and effect measures such things as whether the work output facilitates the work of others, provides timely services of a personal nature, or impacts on the adequacy of research conclusions. The concept of effect alone does not provide sufficient information to properly understand and evaluate the impact of the position. The scope of the work completes the picture, allowing consistent evaluations. Only the effect of properly performed work is to be considered. No credit is given for the consequences of employee error.

At Level 5-1 (25 points), the only level described in the GS-350 PCS, the purpose of the work is to provide equipment services and/or products to external customers on a timely basis. Performance affects the quality and timeliness of the service; however, the work does not affect the accuracy or reliability of the subject matter.

As at Level 5-1, the appellant's work, providing printing and duplicating service, while affecting the quality and timeliness of the work, does not affect the actual accuracy and reliability of the final reports. The content of the reports is controlled by the organizations that produce them. Therefore, Level 5-1 (25 points) is credited.

Factor 6 - Personal Contacts

This factor includes face-to-face contacts and telephone and radio dialogue with persons not in the supervisory chain. Levels described under this factor are based on what is required to make the initial contact, the difficulty of communicating with those contacted, and the setting in which the contact takes place (e.g., the degree to which the employee and those contacted recognize their relative roles and authorities). Above the lowest level, points may be credited under this factor only for contacts which are essential for successful performance of the work and which have a demonstrable impact on the difficulty and responsibility of the work performed.

We find the appellant's contacts meet those described at Level 6-2 (25 points) the highest level described in the GS-350 PCS. At Level 6-2, personal contacts are primarily with employees in organizations serviced. This may include recurring contacts with employees of other Federal agencies that are recipients of an equipment service, as well as manufacturers' equipment repairers and sales personnel. Contacts are routine and normally occur in the employee's immediate workplace.

The appellant's personal contacts include other equipment operators, computer programmers, systems analysts, customer engineers, quality assurance personnel, computer operators, customer end-users, and management personnel requiring systems output information. The appellant's contacts with DLA Columbus, DISC Mechanicsburg and the systems manager on equipment

operation issues are fundamental to the successful performance of his work and have a demonstrable impact on the difficulty and responsibility of the work; i.e., printing completed products. As at Level 6-2, contacts are routine and the roles and responsibilities of the parties are easily established. Therefore, Level 6-2 (25 points) is credited.

Factor 7 - Purpose of Contacts

The purpose of personal contacts ranges from factual exchange of information to situations involving significant or controversial issues and differing viewpoints, goals, or objectives. The personal contacts which serve as the basis for the level selected for this factor must be the same as the contacts which are the basis for the level selected for Factor 6.

At Level 7-1 (20 points), the only level described in the PCS, personal contacts are for the purpose of exchanging, clarifying, or obtaining factual information relating to the work to be performed and the set up, operation, and adjustment, of the equipment operated in the position. This compares closely to the contacts described in the PD of record and confirmed during our on-site fact-finding.

The appellant's contacts are to coordinate assigned duplication and printing requirements to ensure timely production of material, clarify information on current processing, resolve problems and discuss remedial/preventive equipment maintenance. He communicates with recipients to recommend corrections based on routing codes and to obtain addressing updates to update the operator's handbook. This is evidence of the exchanging, clarifying, or obtaining factual information typical of Level 7-1 work. Therefore, we find that the position meets, but does not exceed Level 7-1 (20 points), the only level described in the GS-350 PCS, and have so credited the position.

Factor 8 - Physical Demands

The "Physical Demands" factor covers the requirements and physical demands placed on the employee by the work assignment. This includes physical characteristics and abilities (e.g., specific ability and dexterity requirements) and the physical exertion involved in the work (e.g., climbing, lifting, pushing, balancing, stooping, kneeling, crouching, crawling, or reaching). To some extent the frequency or intensity of physical exertion must also be considered, e.g., a job requiring prolonged standing involves more physical exertion than a job requiring intermittent standing.

At Level 8-2 (20 points), the work requires some physical exertion such as extended periods of standing, frequent bending, reaching, stooping, or similar activities necessary to set up, operate, adjust, and monitor the operation of the equipment. The employee lifts, on a recurring basis, a variety of moderately heavy materials and supplies such as boxes of chemicals, record boxes, boxes of cards and envelopes, cartons of film; and occasionally the employee may be required to lift heavy (more than 50 pounds) items such as mail bags or large stacks of paper stock.

The appellant's work requires some physical exertion such as extended periods of standing, frequent bending, reaching, stooping, walking, pushing or similar activities necessary to set up, operate, adjust, and monitor the operation of the Xerox 4180 system. He regularly lifts boxes of paper stock weighing up to 50 pounds. Further, the appellant is required to maintain a work pace consistent with the speed of the equipment and the needs of the end-user customers. These physical demands, in conjunction with the long periods of time standing, meet Level 8-2 (20 points).

In contrast, work at Level 8-3 (50 points), in addition to the physical demand described at Level 8-2, requires frequent lifting of heavy objects more than 50 pounds such as large boxes of paper, cartons of cards or mail bags. The appellant, however, does not routinely lift the heavier weights typical of Level 8-3. Therefore, this factor is credited at Level 8-2 (20 points).

Factor 9 - Work Environment

The "Work Environment" factor considers the risks and discomforts in the employee's physical surroundings or the nature of the work assigned and the safety regulations required. Although the use of safety precautions can practically eliminate a certain danger or discomfort, such situations typically place additional demands upon the employee in carrying out safety regulations and techniques.

At Level 9-2 (20 points) the highest level described in the GS-350 PCS, the work involves moderate risks and/or discomforts, e.g., a high level of noise, paper dust, ink, solvents, lubricants, chemicals and chemical fumes, and working around equipment in operation. Special safety precautions are required. The employee may be required to use protective gear such as ear plugs or gloves during a particular equipment operation.

Much of the appellant's work is performed in an environmentally controlled setting typical for printing/duplicating operations typical of Level 9-1. The work area is relatively cool requiring only normal clothing to compensate for minor discomfort. The work area is well-lighted and properly maintained. However, the appellant's equipment maintenance and operating functions involve the use of and exposure to moderate risks and/or discomforts typical of Level 9-2, e.g., electrical shocks, noise, paper dust, toner, developer, chemicals, paper cuts, skin irritations, equipment grease, oils, solvents, cleaners, heating elements and moving parts. The appellant is also exposed to more serious injuries such as severe bruises, puncture wounds, lacerations, and dismemberments from high speed equipment operations. The high temperature cited by the appellant are conditions fully considered at Level 9-2 in the PCS. Therefore, we find that the position meets, but does not exceed Level 9-2 (20 points) the highest level described in the GS-350 PCS, and have so credited the position.

Summary

In summary, we have credited the position as follows:

Factor	Level	Points
1. Knowledge required by the position	1-3	350
2. Supervisory controls	2-2	125
3. Guidelines	3-2	125
4. Complexity	4-2	75
5. Scope and effect	5-1	25
6. Personal contacts	6-2	25
7. Purpose of contacts	7-1	20
8. Physical demands	8-2	20
9. Work environment	9-2	<u>20</u>
Total points:		785

A total of 785 points falls within the GS-4 grade level point range of 655-850 points in the Grade Conversion Table provided by the PCS.

Decision

The appellant's position is classified properly as Peripheral Equipment Operator, GS-350-4.