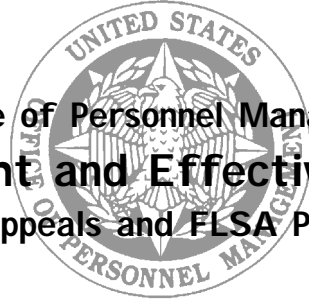


U.S. Office of Personnel Management
Office of Merit Systems Oversight and Effectiveness
Classification Appeals and FLSA Programs



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

Classification Appeal Decision
Under Section 5346 of Title 5, United States Code

Appellant: [Appellant's name]

Agency classification: Fuel Distribution System Worker
WG-5413-8

Organization: Fuels Management Flight
LGS Supply
[number] Logistics Squadron
[number] Wing
[State] Air National Guard
[name] Air National Guard Base
[location]

OPM decision: Fuels Distribution System Worker
WG-5413-8

OPM Decision Number: C-5413-08-01

Robert D. Hendler
Classification Appeals Officer
/s/ 4/30/98

Date

As provided in section S7-8 of the Operating Manual, Federal Wage System, this decision constitutes a certificate that is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. There is not right of further appeal. This decision is subject to discretionary review only under conditions specified in section 532.705(f) of tile 5, Code of Federal Regulations (address provided in appendix 4, section H).

Decision sent to:

PERSONAL

[appellant's name]
 [name] Air National Guard
 [name]/LGSF
 [address]
 [location]

Human Resources Officer
 The Adjutant General
 State of [name]
 Attn: [name]-AG-HRO
 [number] Regiment Armory
 [address]
 [location]

Mr. Steve Nelson
 Director for Human Resources
 National Guard Bureau
 4501 Ford Avenue
 Alexandria, VA 22302-1454

Chief, Classification Branch
 Field Advisory Services Division
 Defense Civilian Personnel Management
 Service
 1400 Key Boulevard, Suite B-200
 Arlington, VA 22209

Introduction

On January 16, 1998, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) received a job grading appeal from [appellants' names]. Their jobs currently are graded as Fuel Distribution System Worker, WG-5413-8. However, they believe their job should be evaluated at a higher grade. They work in the Fuels Management Flight, LGS Supply, [number] Logistics Squadron, [number] Wing, Maryland Air National Guard, [name] Air National Guard Base, [location]. We have accepted and decided his appeal under section 5346 of title 5, United States Code (U.S.C.).

General issues

In their appeal letter dated January 13, 1998, the appellants maintain that their jobs were downgraded improperly (they occupy identical additional position descriptions [PD's]). They previously occupied an "Exception Position Description" upgraded in 1992 "through the efforts of an on site audit by our State Classification Specialist." On April 21, 1997, the National Guard Bureau (NGB) released a new Fuel Distribution Worker, WG-5413-8 standard PD and directed its implementation, cautioning that "A new locally developed position description must be accomplished if those contained in the release so not reflect the duties performed." The appellants were placed on PD #880254000 (Fuel Distribution System Worker, WG-5413-8) effective September 14, 1997. In a decision dated January 5, 1998, the Department of Defense Civilian Personnel Management Service denied their request for upgrading to "Fuel Distribution System Worker, WG-5413-10."

The record shows the appellants do not disagree with the basic accuracy of the PD of record, but claim that the duties and responsibilities they perform have not been evaluated correctly. In particular, they stressed their responsibility for: (1) operating and maintaining a liquid oxygen (LOX) system and support equipment; (2) controlling the "movement and storage of two 10,000 gallon fuel service station tanks which are physically separate from the aviation storage facility" that require daily accounting, inventory and inspection; (3) performing a range of fuels laboratory duties not reflected fully in the agency decision; (4) performing tank to tank transfer daily to remove water from tanks bottoms; (5) pulling "a 60 Foot 3 inches in diameter, 'wet hose', meaning the hose is full of fuel, which weighs 6.7 lbs/gal causing the hose to weigh approximately 400 pounds. Keep in mind the distance from the refueling vehicles to the aircraft is 40-50 feet"; and, (6) working in all weather conditions without protection. They stressed the change in knowledge required by changing technology, e.g., computer knowledge, increased schooling for technical work functions, and more stringent environmental control requirements.

The appellant's claim that incorrect JGS's were used to evaluate their work. They contend that the Pipefitter, WG-4204 and Electrician, WG-2805 JGS's, applied correctly, would support their jobs at the WG-10 level. They disagree with application of the Boiler Plant Equipment Mechanic, WG-5309 and Plumber, WG-4206 JGS's to evaluate their work. The appellants claim that if the WG-5309 JGS must be applied, it would also would yield evaluation at the WG-10 level. They believe their operating of a refueling vehicle with a gross vehicle weight (GVW) of 70,000 pounds that "at any given time may have to be drive[n] on public highways, interstates or cross taxiways to support

refueling operations at [name] Airport” warrants evaluation above the WG-4 level. The appellants claim they:

may be required to drive to [location] forty to fifty miles away, day or night. They may also be tasked to drive refueling vehicles long distances to support exercises anywhere from 100-300 miles away, day or night. Mission requirements dictate the nature of our driving environment. This facility has driven refueling vehicles over state highways for considerable distances. . . . Department of Transportation also requires DOT certification of refueling vehicles annually for highway certification. Appellants must evaluate road conditions, load limits of bridges, schedule weigh points and assess traffic conditions and hazards locally and over long-distance routes in unfamiliar geographic areas. Some trips can require highway speeds for extended periods even at night. The appellants do have to apply skills and knowledge of road restrictions in selecting from a choice of routes to travel, especially in adverse weather conditions.

The appellants claim they: (1) drive refueling vehicles in all kinds of weather; (2) must follow emergency snow routes when driving off base; (3) must use caution in adverse weather conditions, especially around parked aircraft; and, (4) are knowledgeable of the “Interlock systems during bad weather. Routes to bulk storage may require altering based on weather conditions.”

These submissions raise several issues warranting clarification. Implicit in the appellants’ rationale is that they continue doing the same work as when they occupied the locally classified Fuel Distribution System Worker, WG-5413-9 job. Therefore, if that PD was evaluated at the WG-9 level, their new NGB standard PD also should be evaluated at least at the WG-9 level. By law, we must classify jobs solely by comparing their current duties and responsibilities to OPM job grading standards (JGS’s) and guidelines (5 U.S.C. 5346). Therefore, other methods or factors of evaluation, such as comparison to other jobs that may or may not be graded properly, e.g., the appellants’ previous jobs, are not authorized for use in the job grading process. The grading of a job requires that only those skills, knowledge, and qualifications that are of significance in performing the grade controlling work of a job be considered in the classification analysis process. Possession of certificates or licenses may be considered only to the extent that the skill and knowledge gained from those experiences is required to perform the grade controlling work of the job. It is presumed in all JGS's that the work will be performed properly according to all applicable laws, rules, and regulations. The requirement for licensing has potential for grading impact only if it requires skill and knowledge significantly above that described in the JGS at specific grade levels.

We have evaluated the work assigned by management and performed by the appellants according to these job grading requirements. In reaching our decision, we carefully reviewed the information provided by both the appellants and their agency, including the appellant’s PD of record, which they and their supervisor agree is accurate. In addition, we conducted an on-site audit with the appellants and their immediate supervisor, [name], on April 15, 1998. Our audits found the PD contains the major duties and responsibilities assigned by management and performed by the appellants.

Job information

The appellants occupy a standard NGB position description covering a variety of operating situations, e.g., supplying LOX or liquid nitrogen (LIN). The appellants operate, maintain, and perform operator level maintenance in an Air National Guard installation providing continuing support to 8 C-130 cargo and 15 A10 fighter aircraft, and transient aircraft that use the facility. The aircraft bulk fuel storage facility consists of two 5,000-barrel JP-8 tanks. Two receiving fuel stations and three fuel fillstands are located across the street from each other, are within approximately 200 feet of the two JP-8 Storage tanks. Fuel tank status is monitored by an ITT Barton 3500 automatic tank gauge (ATG).

There is no LIN system. The LOX system consists of two 5,000 gallon storage tanks used to fill LOX carts to supply airplane oxygen systems. LOX support equipment includes an air purging unit and a vacuum pump. The largest support equipment is comparable in size to small- to- medium aircraft ground support equipment, and each performs a separate and discrete function. LOX system piping and controls are integral to each storage tank. The systems are not operatively integrated. For example, purging one tank for maintenance requires transferring remaining LOX to the other tank. LOX is off loaded to LOX carts. There are no pipes to areas outside the LOX storage site.

There is a self service motor vehicle fuel station similar to that of a commercial service station. It has two 10,000 gallon fuel storage tanks; one for diesel and one for unleaded gasoline. Access to gasoline and diesel is controlled by a Fuelmaster automated fuel management system.

The appellants rotate through the full range of fuel system operating functions, including receiving, storing, transferring and issuing fuel, and performing operator maintenance, e.g., cleaning and replacing strainers and filters, lubricating valves and pumps. They oversee commercial fuel tanker truck delivery into bulk storage; load fuel from bulk storage into 70,000 GVW tanker trucks; and, load aircraft from those tanker trucks.

They perform a range of fuel quality control tests in the on-site testing laboratory, sampling and testing fuel based on established quality control program requirements, preparing samples for shipping off station as required by regulations and procedures. These tests include, but are not limited to flash point, conductivity additive, filtration time, fuel system icing inhibitor (FSII), fiber, total solids, and odor. The appellants also collect and send LOX samples out for testing as required by regulations and procedures.

They perform the full scope of fuel control actions including requisitioning, scheduling, documenting, and reporting for multiple fuels data bases, e.g., the fuels automated system (FAS) and the standard base supply system (SBSS). They must assure incoming fuel volume is sufficient to support aircraft operational requirements, and that installation tank trucks are filled and positioned to support aircraft operational needs based on anticipated activity, e.g., drill weekends, assuring that they do not compromise war readiness reserves. A co-worker must verify the daily folder on fuel records, sent to the supervisor for a third check, and then sent to the Chief of Supply.

The appellants perform what they describe as intermediate depot level maintenance on the LOX system. They replace tubing, nuts, bolts, high pressure fittings, and reseal the system. They replace or repair valves, from pulling the stem to resealing. They check seals using ultraviolet light and use special tools to work on the brass fittings. Repairs on the LOX equipment include replacing electrical wiring, jump relays, piping, and thermocouples, and removing and replacing internal engines. They replace circuit boards on the electronic control panels on the fuel systems, mother boards due to complete system failures, and plug in chips if the board does not need to be replaced. They do no soldering or other more detailed repairs.

Our audit revealed that the appellants routinely cross runways to deliver fuel to aircraft, including the State operated side of the airport for annual air shows. They travel to Aberdeen Proving Ground, approximately 25 miles away, an average of twice a year. Their last exercise support was more than three years ago, and required driving during one week to Martinsburg, WV. They perform variety of related duties, e.g., filling out forms to order AIM-9 propellant received and stored by the armaments organization. As a regular part of their work, the appellants help in provide on-the-job training to National Guard members assigned to their work function. We find the PD of record contains the major duties and responsibilities of the appellants' jobs and hereby incorporate by reference into this decision.

Occupation, title, and standards determination

The appellants' jobs are mixed jobs, entailing fuel distribution system operation and maintenance, and related paperwork; fuel quality control testing; LOX system operation, maintenance and repair; aviation and ground fuel tank operation; and, planning, monitoring, and conducting on-the-job training for assigned drill status guardsmen. The Job Grading System for Trades and Labor Occupations states that a mixed job involves performance on a regular and recurring basis of duties in two or more occupations at the same or different grade levels. Such a job should be graded in keeping with the duties that (1) involve the highest skill and qualification requirements of the job, *and* (2) are a regular and recurring part of the job, even if the duties involved are not performed for a majority of the time. The Digest of Significant Classification Decisions and Opinions, No. 4, January 1984, provides guidance on what should be considered in determining whether a job is "mixed." The Digest cautions that if a small percentage, e.g., 15 percent of time is devoted to duties identified to another occupation or the highest grade duties within an occupation, care must be exercised because there is a tendency to:

make the following errors: (1) crediting duties which are not repetitively performed on a continuing basis and, therefore, should not be credited in any way; (2) incorrectly assuming that the duties require the full range of work and qualifications necessary to warrant the grade being considered; and (3) incorrectly assuming that the duties are performed under normal supervision for the grade being considered when they are performed under closer supervision and, therefore, overgrading the job.

The appellants do not disagree with their agency's determination that their fuel distribution system operating work is evaluated by application of the Fuel Distribution System Operator, WG-5413 JGS and their motor vehicle operator and related work is evaluated by application of the Motor Vehicle Operator, WG-5703 JGS. We concur with these determinations.

The appellants claim the Pipefitter, WG-4204 JGS should be used to evaluate their LOX system maintenance and repair work. The WG-4204 JGS is used to grade jobs involved in the installation, maintenance, and repair of high temperature water and high-pressure piping systems such as hydraulic, nitrogen, oxygen, steam heating, and steam-generating systems. The work involves installing, modifying, and repairing new and existing high-pressure piping systems and equipment such as steam heating, steam generation, and hydraulic systems, steam generators, flash and expansion tanks, condensate, vacuum, and circulating pumps, and radiators. Working from building plans, blueprints, and sketches they plan and lay out the routing, placement, pitch, elevation, pressure reduction, expansion, and operation of various piping systems and equipment. They install, modify, and repair systems by setting up system routes, placing and cutting route openings, placing hangers for proper pitch and elevation, and determining and installing such things as risers, flexible branches, expansion joints, pumps, gauges, and pressure regulators in the combination needed to support the pressures of the systems and that ensure the proper operation of the systems. They also install equipment, like that described above, by planning and completing the routing and placement of systems leading to the equipment, determining and placing the equipment at the proper levels and points in the systems, and joining, sealing, and testing systems and equipment for proper pressures, leak-free joints, and operation.

The job grading process requires that the full intent of JGS's be applied correctly. The WG-4204 JGS covers work entailing the installation, maintenance, and repair of large scale high pressure systems, e.g., boiler plant steam heating and related systems servicing a large shipyard, a large military post, or a large hospital complex. This work requires knowledge of how various high-pressure piping systems and equipment, such as steam heating, steam generation, and vacuum systems, radiators, and circulating pumps, are installed and operate, and requires the skills necessary to use the full range of tools and equipment to perform that work. The two self-contained 5,000 gallon LOX systems do not present the highly complex pressurized piping systems covered by the WG-4204 JGS. The discrete LOX tank systems and their limited auxiliary equipment are not comparable to the extensive, large scale, multi-component steam plant power and/or heat generation, piping, and control systems covered by the WG-4204 JGS. While the high pressure used to store LOX presents a danger requiring adherence to established safety practices, it does not directly impact the grade level worth of the work performed as discussed previously in this decision. Application of the Plumber, WG-4206 JGS is neither necessary nor appropriate for similar reasons.

The Electrician, WG-2805 JGS also does not provide appropriate criteria for grading the appellants' work. The WG-2805 JGS is used to grade jobs involved in the installation, maintenance, troubleshooting, and repair of electrical wiring systems, fixtures, controls, and equipment in industrial, institutional, office, and residential buildings, and on ships. These jobs require knowledge and application of electrical principles, materials, and safety standards. The JGS recognizes that because

of technological and operational changes, many previously electromechanical devices, controls, and equipment have been replaced by solid state devices, introducing the need in some positions for a basic understanding of electronic technology, circuitry, and controls. For example, some positions require the ability to read system diagrams and schematics, interpret electronic terms and symbols, and apply a variety of electronic formulas, tables, charts, and color codes to mount, ground, and install wiring and equipment for various types of electrical/electronic systems, e.g., fire alarm systems, intrusion detection systems, computer systems, sonar and radar equipment, antennas, switch panels and switchboards. Additionally, such positions usually require the ability to use test equipment, such as ohmmeters, vacuum tube voltmeters, and diode checkers to find the problem area and identify it as electrical or electronic, and to perform simple troubleshooting such as testing and isolating defective electronic parts (e.g., diodes and silicon rectifiers) and circuit boards that the electrician may replace or refer to an electronics mechanic for repair. However, the WG-2805 JGS does not contain grading criteria for that work, and refers the user to the Introduction to Electronic Equipment Installation and Maintenance Family, WG-2600 for additional guidance on dealing with occupations that do not fall within the WG-2600 family, but do require some knowledge of electronics.

We find the appellant's maintenance and repair work, for the LOX system, fuel dispensing measurement, and fuel storage measurement covered fully by the grading criteria of the Heating and Boiler Plant Equipment Mechanic, WG-5309 JGS, an occupation not within the WG-2600 family that does require some knowledge of electronics. This JGS covers jobs involved in installing, maintaining, repairing, troubleshooting, and modifying single and multiple fuel heating and power boilers and associated auxiliary and pollution control equipment, hot air furnaces, and similar equipment systems. The systems and equipment provide steam, heat, or hot water for use in the operation of industrial and institutional facilities and equipment. This work requires knowledge of the principles of combustion, heat transfer, and steam and high temperature hot water generation. It also requires the ability to recognize and determine the best method for correcting malfunctions and the skill to install and repair a variety of heat and power producing systems and support equipment. The WG-5309 JGS recognizes that technological advancement in the areas of electronic industrial controls and computerization of boiler facilities' work within this occupation at the full performance level may require familiarity or a basic knowledge of electronic controls and computerized control equipment. The appellants work on electronic controls, piping, and other equipment maintenance and repair issues comparable to those in the WG-5309 occupation.

Based on the grade level analysis that follows, we find the appellants' job is allocated properly as Fuel Distribution System Worker, WG-5413.

Grade determination

In FWS, if a job involves regular and recurring duties at the same level in two or more occupations, such a mixed job is graded at the same level. For example, the appellants' LOX and other maintenance and repair work would only affect the grade determination of their job if it were at a higher grade than their fuel distribution work. Grade levels of jobs are not determined by

accumulation of grade levels of work performed, but by the highest grade of work that is regular and recurring as defined by established OPM job grading guidance.

In addition, the grade level of a job is not based solely on the equipment operated, but also on the skills and knowledges exercised in operating that equipment. That is to say, we do not grade equipment; we grade the difficulty and complexity entailed in the operations the employee conducts in using that equipment. The requirement that employees be licensed or certified to perform work, or that they certify with their signatures that standards of quality and safety have been met in performing work, do not in and of themselves affect the grades of their jobs.

All occupations change over time, some more rapidly and profoundly than others, but the basic duty and responsibility patterns and qualifications required within the occupation generally remain stable. JGS studies are conducted to analyze those changes, and assure that JGS grading criteria are modified, as necessary, so that the defined levels maintain their correct relationship with the key rank jobs that form the grading structure basis of the FWS. Those grading relationships are then used in the pay survey process to assure that jobs are compensated properly according to the key rank job pay setting scheme within the FWS. Therefore, the technological changes recognized in the JGS's discussed above, and the current WG-5413 JGS, published in July 1993, reflect the proper grading relationship between those FWS occupations and the FWS key rank jobs. These JGS's recognize that solid state devices have replaced electromechanical devices, controls, and equipment. By referring to grading guidance in more recent JGS's, we can assure that careful application of other JGS's will yield the correct grade for the work performed. Therefore, any duties not specifically referenced in a controlling JGS can still be evaluated by comparison with similar or related duties that the JGS does describe, and the entire pattern of grade level characteristics. Our analysis fully considers the on-the-job guidance provided to National Guard personnel by the appellants.

Evaluation using the WG-5413 JGS

The WG-5413 JGS uses four factors for grade determination: *Skill and Knowledge*, *Responsibility*, *Physical Effort*, and *Working Conditions*. These factors are definitive for the grade evaluation of motor vehicle operator work. They serve to provide both the framework within which the occupation is structured and specifically applicable criteria for the appraisal of levels of work. Typical of many trades and crafts jobs at higher grade levels in the FWS, *Physical Effort* and *Working Conditions* are the same at all levels defined in the JGS. These two factors have grade level significance only in lower graded jobs. For example, heavier physical demands help to distinguish between Laborer, WG-3502-2 and WG-3502-3 work. They are not grade determining for WG-5413 or other skilled trades and crafts work. Therefore, we will not address them in detail.

Skill and Knowledge

At the WG-8 level, employees use skills to operate complex work stations or portions of a large fuel distribution system and other portions of the system to coordinate their work with the work of others. For example, they: (1) operate various types of pumps used to load, unload, and transfer fuel oils,

gasoline, and jet fuels through pipelines and hoses to and from tank farms, fueling pits, ships, aircraft, tankers, railroad tank cars, and tank trucks, working from loading and pipeline transfer schedules and from instructions received from a supervisor or a system operator; (2) unload, load, transfer, or store fuel supplies by operating compressed air, electric, diesel, gasoline or steam pumps, and accessory equipment, making adjustments to maintain adequate pressure, and start or stop pumps according to tank gauge readings, warning horns, signal lights, and operating needs and instructions, set pipeline and tank valves and manifolds, or issuing appropriate instructions to a worker who operates the gauges, maintain records of fuel transfers, and load and unload tank cars, pump ballast from oil tankers, and remove water and sediment from storage tanks and other facilities; (3) gauge tanks, by sounding tanks, using plumb bob and scale, before, during, and at the end of fuel operation to learn the net volume received or issued, observe rates of flow from dial gauge readings and check stray water content of tanks using special paste on measuring tapes, take temperature readings of liquid fuels at various levels in tanks, compute mean temperature, and from a table, convert volume at tank temperature to an equivalent volume at standard temperature, keep records such as gauge and scale readings and volume transferred, and take samples of fuels for laboratory analysis; and, (4) patrol pipelines and tank farm areas, examining facilities and equipment, reporting the need for repairs, and perform general maintenance work, such as flushing tanks, cleaning nozzle strainers, pit box strainers, truck loading stand strainers, fill line strainers, and water line strainers. They are required to know the operation of one or several complex work stations in a distribution system, demonstrate the skill to manipulate the numerous controls to properly regulate the flow of the liquids in a safe and efficient manner, or they operate part of a complete distribution system. Most of the work at this grade level is done at activities such as large fuel depots or fuel farms with complex, interconnecting line and pipe arrangements and frequent requirements for large scale movement and transfer of a variety of liquid fuels. WG-8 workers typically work at several stations during their work cycle, and the nature of the assignments usually requires them to coordinate their work with the work of others.

In contrast, WG-10 employees operate petroleum products distribution equipment by initiating and controlling the movement and storage of supplies throughout complete pipeline or tank farm systems, using telephone communications, signal systems, a central control board, or similar facilities. That is, WG-10's operate high pressure systems with a series of terminals connected by cross-country pipelines or multifuel storage and distribution facilities connected by a network of internal pipelines. They move and transfer fuel using telephone communications, electric signals, a central control board or similar methods that are either completely automatic or where one or two workers help by controlling a portion of system. Within this work context, WG-10's: (1) operate or issue orders by telephone to other workers to clear lines and open or close the valves in proper sequence to provide an open pipeline from a point of origin of shipment to a destination, according to pipeline transfer schedules and related instructions, record valve settings on a central control board and initiate, control, and end fuel transfers, record gauge readings received at regular intervals from shipping transfer and receiving points, and prepare a report of transfer, determine if facilities are functioning properly, and if discrepancies appear, stop the transfer and order an investigation and correction of trouble; (2) direct loading and unloading of oil tankers and transferring of fuel from one storage tank to another, order the setting of lines and test the electrical signal system that actuates pressure alarm systems, warning horns, and signal lights, operate a remote control switchboard to start and stop ship

loading and booster pumps and match pressure gauges during loading, calculate the rate of flow of fuel to decide if pumps are developing maximum output and regulate tank feed controls to obtain adequate suction; (3) control transfers to and from leased tank farm storage and pipeline facilities using a knowledge of the condition of the line, what type of oil is in the line, whether or not it is necessary to displace the existing oil with water before pumping the product through the line, and where they should store displaced oil pending completion of the operation; and, (4) periodically test the system and examine it for leaks by pressurizing it and examining parts and controls such as the fill and gauge couplings, packing nuts on valves, strainer caps, exposed tank and water trap connections, plugs and caps on air chambers, water control manifold valves, exposed piping and controls in fueling and utility pits, and hoses and swing joints.

A significant portion of the appellants' work does not exceed the WG-6 level. For example, they spot tank trucks in proper positions, inspect for possible leaks, monitor fuel delivery, and take test samples; transfer fuel from storage tanks to aircraft tank trucks; and, operate a hydrant refueling system, recording prescribed information for program tracking purposes. The appellants also work in a small fuel system in which the interconnecting lines for fuel hydrant off loading and loading to tank trucks is limited to a single fuel; i.e., JP-8. The pending conversion of one of the two tank systems from JP-8 to JP-8 plus 100, does not reflect fully the multifuel environment typical of the WG-8 level. The diesel and gasoline service station and the LOX systems are separate and distinct from the JP-8 system. However, the appellants perform a range of operations typical of the WG-8 level. For example, they rotate through all operations, and perform the full scope of work examples two and three at the WG-8 level described above, albeit in a more restricted fuel farm environment. Similarly, they perform aspects of work examples one and two, but do not perform the full range of fuel pumping and transfer functions, e.g., from fueling pits, ships, and railroad tank cars, found at the WG-8 level.

The fuel distribution system environment in which the appellants work does not meet the WG-10 level. Bulk JP-8 storage and distribution, combined with the discrete LOX and service station storage and dispensing systems, is not equivalent to the multifuel connected pipeline system or cross-country pipelines operated at the WG-10 level. Transferring fuel from one JP-8 tank to the other is not equivalent to operating highly complex automated equipment to load and unload oil tanker ships, or performing major pipeline transfers. The appellants' system operating, testing and maintenance functions are done in a system environment materially less complex than found at the WG-10 level. For example, the communications systems used at the WG-10 level pertain to an environment in which the principal operator must direct the functions of other WG-5413 workers who each do portions of the activities necessary to transfer large volumes of fuels, e.g., into or out of multiple fuel oil barges, or through pipelines to other areas of the country. Local communications from the Fuel Distribution Flight building to deployed trucks, or calling the manufacturer for control troubleshooting assistance does not meet the intent of WG-10 system coordination demands. The ATG and Fuelmaster control/sensing systems are far more limited in functional scope and complexity than the centralized system controls used to control the larger and more complex distribution systems at the WG-10 level. The WG-5413 JGS reflects pressurized operations at all grade levels, and caution regarding alarms indicating spills are intrinsic to the occupation. The WG-10 level involves

responding to these conditions within the large scale system environment found at that grade level, typically by directing and controlling work functions performed by others within that system.

The appellants stressed their responsibility for laboratory testing functions, skills and knowledges not previously vested in their jobs. Other Industrial Equipment Operation Family, WG-5400 occupations do testing functions as an integral part of their duties. For example, Water Treatment Plant Operator, WG-5409-8 jobs routinely include testing and checking items, such as pH level, turbidity, and fluoride and chloride content, using instruments such as ethylometers and pH meters to take measurements. In addition, WG-5409-8 jobs treat the water with silicates and chemical agents such as chlorine, fluoride, and manganese to maintain acceptable water quality standards. They also perform maintenance and repair, including packing glands, repacking valves, and replacing valves and basic gauges. The appellants testing functions do not fully meet these skill and knowledge requirements. While they perform comparable tests, they do not modify the fuels received and stored. These additional functions, however, reflect the exercise of the variety of skills and knowledge typical of the WG-5413-8 level equivalent to working at several stations during the work cycle and coordinating their work with the work of others, e.g., fuel receiving, sampling and testing. Because the appellants do WG-8 functions for a substantial portion of their work time, this factor is credited properly at the WG-8 level.

Responsibility

At the WG-8 level, higher grade workers or supervisors who are responsible for the operation of the complete fuels distribution systems assign WG-8 workers the responsibility to perform assignments according to manuals and prescribed directives that outline the work to be performed and the safety and security measures needed to avoid potentially unsafe conditions. WG-8 workers take necessary action to insure correct and safe operating conditions in emergency situations and have the authority to deviate from standard procedures if necessary. Work at this level is accomplished with no in-progress review. Completed work may be spot-checked to assure compliance with procedures, instructions, and established practices. Work at this level is usually done at sites where the supervisor is not immediately available when unusual problems occur. WG-8 workers are accountable for compliance with prescribed work methods, regulatory requirements, and safety considerations.

In contrast, WG-10 operators receive work assignments from a supervisor or a higher grade operator either orally or in writing. They are responsible for the operation of the system, the accountability for the fuel received, stored, transferred, and issued, and proper and safe handling procedures. They are responsible for keeping records and making reports on items such as tank readings, amounts received, distributed and dispensed, intermix of fuels, and unsafe or hazardous conditions. WG-10 operators are required to decide the method and sequence of work processes to be used and to control the kind and amount of fuel, and the sequence and method of moving the fuel, by operating the equipment from a central station. They comply with regulations and provide efficient service according to the demands on the system.

The level of responsibility described at each level in the WG-5413 JGS is directly related to the scope of work functions performed at that same defined grade level discussed previously in this decision. That is, WG-10 level responsibility is predicated on doing the full range of WG-10 level work in a fuel distribution system with WG-10 level characteristics; i.e., multifuel connected pipeline systems or cross-country pipelines. The appellants' ongoing responsibilities in doing WG-8 level work a significant portion of their work time fully reflect the freedom from supervision found at the WG-8 level in the WG-5413 JGS. As at the WG-8 level, they perform their work assignments, e.g., fuel ordering and receipt, independently, using sound judgement in applying established trade practices. Therefore, this factor is credited properly at the WG-8 level.

Physical Effort and Working Conditions described in the WG-5413 JGS are the same at all defined grade levels. As discussed previously, the physical effort entailed in pulling the fuel tank hose has no grade level impact. The appellants' exposure to the elements is typical of the occupation. The JGS specifically recognizes working outside in all weather conditions. Very limited shelter is available at the LOX site, at the filtration section near the JP-8 tanks, and at the diesel and gasoline dispensing area.

Based on the preceding analysis, and applying the whole job grade criteria of the FWS, we find the appellants' distribution system operation work is graded properly at the WG-8 level.

Evaluation using the WG-5703 JGS

The Motor Vehicle Operator, WG-5703 JGS covers nonsupervisory work involved in the operation of gasoline, diesel, or electric powered wheeled vehicles to haul cargo and fuel, transport passengers, or to tow or recover equipment. The vehicles are driven in restricted traffic environments on Government installations, over public roads and highways, or under cross-country conditions. Also included are motor vehicles that have special-purpose or auxiliary devices where a knowledge of such devices does not exceed the knowledge and skill required to operate the vehicle safely. The WG-5703 JGS uses the four standard FWS factors for grade determination: *Skill and Knowledge, Responsibility, Physical Effort, and Working Conditions.*

The underlying premise in grades above WG-4 is that vehicles are driven on Government installations and on public roads in a full range of traffic conditions or in installation environments that exhibit the same driving characteristics as public roads on a regular and recurring basis. Such public road characteristics would include widely dispersed urban and rural roadway systems; two-lane and four-lane highways; various weight limits and vehicle prohibitions on certain roads or bridges; a range of driving speeds and highway speed limits on some roads; various traffic signals and multiple types of intersections; frequently heavy traffic congestion; and sharp curves and blind or steep hills. Situations within the confines of an installation, such as driving in congested industrial areas, impose skill and knowledge requirements on motor vehicle operators similar to the demands of driving on public roads in all kinds of traffic. The requirement that vehicles are operated on public roads or the equivalent in terms of driving characteristics is consistent with the key ranking job descriptions for Truck Driver (Light), Truck Driver (Medium), Truck Driver (Heavy) and Truck Driver (Trailer) set forth in Part

I, Appendix 2 of the Job Grading System for Trades and Labor Occupations. In instances where drivers do not use their vehicles on public roads (or the equivalent), a lower grade level than the one depicted in this standard for the type of vehicle driven is appropriate. This is primarily because the knowledge and skill required for the driver to operate the vehicle competently and safely is not as high.

Formerly, indicators such as GVW, load capacity, number of forward speeds, number of driving (powered) wheels, and passenger capacity have been routinely used as the primary criteria for determining grade levels of motor vehicle operator jobs. These indicators were found insufficient for determining the grade of the total job since they do not consider all features of the job that affect the four grade determining factors of skill and knowledge, responsibility, physical effort, and working conditions involved in doing the work. However, GVW provides a frame of reference from which to conduct a complete analysis and evaluation of jobs. Therefore, GVW was retained in the JGS to establish a framework in grade analysis for straight-in-line vehicles, i.e., vehicles that are unitized with the axles, power source or cab portion of the vehicle and load carrying body all on the same chassis. This indicator does not directly apply to passenger buses, passenger ambulance buses, or motor coaches. Since the appellant does not operate these passenger vehicles, we will not address those related grading criteria in our analysis of his job. The final grade level for all vehicle operating positions must be based on a thorough consideration of the four grading factors of the total job.

Skill and Knowledge

At the WG-8 level, the highest level in the WG-5703 JGS, drivers operate and do operator maintenance on straight-in-line trucks that typically have an approximate GVW of more than 14,400 kilograms (32,000 pounds). Also, at this grade level are drivers who operate truck tractors with semi-trailers or full trailers, and motor coaches. The drivers of tractor-trailer or truck and full trailer combinations (including tractor-trailer refueling vehicles) couple and uncouple the truck tractor and semi-trailer or truck and trailer, and connect and disconnect the air brakes and electrical lines, maneuver vehicles within close tolerances when driving and backing over uneven ground and in narrow or congested areas, between buildings and other vehicles, between parked aircraft and when positioning vehicles at loading docks. Tractor-trailer refueling operators drive heavy load vehicles on the flight line and over public roads (or the equivalent). They operate the vehicle's auxiliary pumping system including regulating the pumping pressure and the rate of fuel flow that varies with each type of aircraft being serviced. They verify that the fuel is the correct grade or mixture for the aircraft, that the aircraft is properly grounded, that there is no fuel leaking from the aircraft, and that the aircraft fuel tanks are not overfilled. They record the amount and type of fuel dispensed. They select the safest, most direct, and legally allowed route to be followed, and identify alternative routes that may be used if emergencies arise. They operate these vehicles on interstate highways, winding roads, and steep grades and manipulate the dual braking system to prevent the semi-trailer or trailer from jackknifing.

Drivers at this level have greater knowledge and skill in the operation of their vehicles than required of drivers at the WG-7 level since the vehicles driven have limited maneuverability; have more than

one body and two braking systems; or are oversized and carry large groups of people on trips where long periods of day and night driving are involved. These drivers use greater skill and knowledge in turning the vehicles, in evaluating the condition and load limits of bridges, in scheduling weigh points, and in assessing traffic conditions and hazards locally and over long-distance routes in unfamiliar geographic areas. Drivers of tractor-trailer refueling vehicles at this level have skill to maneuver such combination vehicles around parked aircraft and in constricted refueling areas. They have knowledge of the vehicle's fuel pumping system to transfer fuel safely to and from the vehicle and aircraft. These drivers have skill to drive such heavy load vehicles over rough terrain or soft ground and avoid tipping or similar accidents when refueling rotary wing aircraft in the field. Drivers at this level have skill to maneuver oversize vehicles safely in narrow and confined locations that are often congested with other vehicles. WG-8 level drivers apply more skill and knowledge in driving their vehicles without mishap in complicated traffic situations, and to remain attentive and maintain a defensive attitude while making interstate drives at highway speeds for extended periods, often at night.

The appellants' jobs fully meet the intent of the WG-8 level skill and knowledge requirements, and exceed them regarding the weight of the fuel trucks driven. However, we must note that less demanding driving conditions, i.e., where drivers do not use their vehicles on public roads (or the equivalent), calls for a lower grade level than the one otherwise attained in the standard, whatever grade level that might turn out to be when the overall job is examined. The appellants' off-base public road driving is not regular and recurring work within the meaning of the FWS as discussed previously in this decision. These trucks are rarely used off the installation grounds. Although some aspects of WG-8 level skill and knowledge requirements are met, others are not. For a grade level to be assigned, all of the requirements must be met. Therefore, while the appellants' jobs require aspects of WG-8 level skill and knowledge in operating tanker trucks, they are not performed regularly on public roads (or the equivalent) and are not performed under the full range of driving conditions intrinsic at that level. Consequently, a lower grade level than the one depicted in the JGS for the type of vehicle driven is appropriate in that full WG-8 level knowledge and skill are not required by the appellant in operating these larger and more complex vehicles competently and safely. Therefore, the skill and knowledge required by the appellant's position does not exceed the WG-7 level.

Responsibility

At the WG-8 level, drivers receive instructions from the dispatcher or supervisor on the type of vehicle to be operated, destination, cargo or passengers to be transported, purpose of the trip, and deadlines to be met. Drivers at this level either determine the route to be followed or follow prescribed routes and identify acceptable alternative routes for use in emergencies. Drivers who operate tractor-trailer or truck and full trailer combinations are responsible for overseeing or assisting others with the loading and unloading of cargo and making difficult judgments concerning the arrangement and securing of that cargo. This responsibility is greater than described at the WG-7 level because the size and type of the vehicle increase the tendency of the trailer to sway and the driver to lose control of the vehicle. WG-8 drivers manage their assignments with virtually no supervision, and are responsible for the safe transport of cargo or the comfort of passengers on

extended trips. Work is evaluated for efficiency and compliance with established policies, procedures and instructions pertinent to the driving mission.

The appellants' jobs fully meet the responsibility requirements of the WG-7 level, and meet some, but not all the responsibility requirements for the WG-8 level. While they decide the route to be followed, little driving is done outside the installation. Thus, overhead power lines, weight limitations, clearance of underpasses, and highway restrictions are not significant concerns. The appellants work essentially on their own, requesting advice from the supervisor only when encountering unusual circumstances. The appellant's work receives the limited review typical of the higher grade levels in the occupation. Therefore, because the vehicle operation requirements, as discussed previously, fail to meet the WG-8 level fully, this factor must be credited at the WG-7 level.

Physical Effort

At the WG-5 level, besides the physical demands of lower grade levels, moderate physical effort may be required in making couplings between the vehicle and towed equipment because safety chains, towbars, and hooks must be lifted and properly secured. Considerable physical effort may be required to change tires and make limited emergency repairs, such as installing an emergency fan belt or replacing an electrical fuse on open highways. Besides the requirements above, WG-6 level work requires greater physical effort to maneuver the longer and heavier vehicles, especially when backing these vehicles. At the WG-7 level, in addition to the requirements for the WG-6 level, the driver exerts moderate physical effort in operating, turning, backing, and controlling vehicles that carry heavier loads or larger numbers of people than vehicles at the WG-6 level. In addition, drivers at the WG-8 level may exert moderate to heavy physical effort in climbing on tractors to hook up service lines, lower landing gears, and in climbing on the trailer to load or tie down cargo. The appellants' jobs fully meet the WG-8 level since they drive the larger vehicles that carry the typical heavy loads of the WG-8 level. The pulling of tanker fuel hoses, stressed by the appellants, are covered fully by the physical effort recognized at this level. Therefore, the WG-8 level is credited for this factor.

Working Conditions

This factor considers the physical hardships, environmental hazards, and working conditions to which workers are exposed in the performance of their assigned work. The standard distinguishes between the WG-4 level, where the driving is done on an installation and the WG-5 and higher levels where the vehicle is operated primarily on public roads. At the WG-4 level, drivers work mostly outside and operate vehicles in all kinds of weather in a controlled traffic environment throughout a Government installation or establishment. Drivers are exposed to dirt and fumes, and to the possibility of cuts, bruises, and broken bones from accidents while driving or from falling objects when loading and unloading the vehicle. Besides the working conditions described at the WG-4 level, at the WG-5 level and above drivers operate vehicles in all types of traffic and weather on public roads (or the equivalent), and are exposed to the danger of serious accidents. They drive in heavy traffic and at highway speeds over complicated road and interchange systems. The working conditions at the WG-6 and higher grade levels in the JGS are the same as those at the WG-5 level.

The appellants do not regularly operate vehicles at highway speeds, in heavy traffic, over complicated road and interchange systems. Consequently their jobs do not meet the working conditions defined at the WG-5 level and above on this factor.

Based on the preceding analysis, and applying the whole job grade criteria of the FWS, we find the appellants' motor vehicle operator work is graded properly at the WG-7 level.

Evaluation using the WG-5309 JGS

The workload data provided by the appellants calls into question whether the "intermediate depot level" maintenance work, as defined by the appellants, is performed with sufficient frequency to warrant evaluation as regular and recurring work within the meaning of the FWS. However, because that work is critical to the appellants' appeal rationale, we will address the job grading issues they have raised.

The WG-5309 JGS covers work involved in installing, maintaining, repairing, troubleshooting, and modifying single and multiple fuel heating and power boilers and associated auxiliary and pollution control equipment, hot air furnaces, and similar equipment systems. The systems and equipment provide steam, heat, or hot water for use in the operation of industrial and institutional facilities and equipment. The work requires knowledge of the principles of combustion, heat transfer, and steam and high temperature hot water generation, the ability to recognize and determine the best method for correcting malfunctions and, the skill to install and repair a variety of heat and power producing systems and support equipment.

Skill and Knowledge

WG-8 heating equipment repairers install, repair, and maintain a variety of domestic heating equipment and systems such as oil fueled heaters, hot air furnaces, heating boilers, and other systems and equipment with similar heat sources, controls, and circulating methods. In comparison to the complicated large scale industrial systems serviced at the WG-10 level, these heating equipment and systems are usually uncomplicated and do not have complex maintenance requirements. They are typically in administrative offices, shops, warehouses, dormitories, residential housing, and motor pools.

WG-8 repairers have a working knowledge of the standard methods of combustion, heat transfer principles, and fuel characteristics to install, repair, and maintain heating boilers and domestic heating units and systems. They have knowledge of heating surfaces, combustion chambers, and the various heat circulating methods, and have a working knowledge of pneumatics, electricity, and basic electronics to locate faults in temperature controls and control devices such as damper motors, mixing valves, and modulating motors. They install, adjust, repair, or replace components, control devices, and units. They have skill in determining the condition of system parts and components to make repairs or replacements, including replacing defective burners, switches, fuel lines, cutoff assemblies, and examining and adjusting thermostats, repairing or replacing motors, blowers, pilots and ignitors,

and other heating related equipment; maintaining electrical, pneumatic, and mechanical controls; identifying electronic control problems; and making repairs to refractory liners in heating boilers. They visually examine and operationally test electric, electronic, pneumatic, and mechanical systems and equipment using specialized test equipment. Besides doing routine preventive maintenance including removing, replacing, and repairing defective components, WG-8 repairers adjust equipment controls such as temperature sensors, thermostats, and leak detectors. They use technical manuals, manufacturers' manuals, and special instructions to decide whether replacement, service, or repair of key parts or components of the heating system is required, and use shop mathematics to compute fuel consumption rates, heat generating units, and air to fuel ratios and conversions. When working in boiler plant facilities, they may perform refractory maintenance including repairs of internal boiler lining using brick and castable materials. They use standard and specialized hand and power tools common to the trade such as adjustable wrenches, pneumatic hammers, pipe cutting equipment, and drill presses. They have skill in the use of precision measuring devices such as calipers and micrometers, and they have a general knowledge of pipe fitting techniques and rigging setups for movement of large heating plant components. They have skill to do routine maintenance on small electric motors, feed pumps, and valves, including replacing brushes, seals, and bearings, and repacking valves. In some work situations, they may help boiler plant mechanics in installing, modifying, repairing, testing, and maintaining equipment such as power boilers and associated auxiliary and pollution control equipment. They repair, replace, and maintain bearings, oil seals, pilots, burners, valves, and electromechanical controls and other items of similar complexity, and help mechanics in installing new plant equipment including boilers, furnaces, pumps, and controls.

In contrast, WG-10 mechanics install, maintain, and repair a variety of complex equipment and systems involving power boilers with complicated components, critical requirements, and rigid tolerances. They repair, troubleshoot, and maintain single-and-multiple fuel power boilers and associated auxiliary and pollution control equipment such as water treatment systems, chemical dispensers, electrostatic precipitators, bag houses and ash removal equipment, and wet particulate scrubbers. Power boilers use oil, gas, coal, wood, refuse derived fuel (RDF), tire chips, or combination fuels in steam or hot water production and distribution plants, and typically include a variety of auxiliary components such as fuel delivery systems, induced draft fans, conveyor belts, preheaters, coal pulverizers, worm screw feeders, moving floors, de-aerating equipment, water treatment equipment, economizers, and air compressors that often require regular adjustment and maintenance to meet rigid tolerances. WG-10 mechanics monitor and test the operation of power boiler systems to identify malfunctions and potential problems with equipment such as automatic controls, valves, bag houses, electrostatic precipitators, lime slurry systems, fly ash recovery systems, piping, pumps, and related components. They examine, adjust, and as necessary, replace and repair equipment such as pneumatic and electrical thermostats, governors, regulators, switches, fuel cutoff devices, burners, fuel feed and flame safeguard controls, steam gland seals, bearings, and drive gears. They maintain burners, burner nozzles, and orifice assemblies, and dismantle and locate defects and reassemble and reinstall components. They service units by cleaning or replacing filters, strainers, orifices, ignition devices, and other items on power boilers, and troubleshoot power boilers and their components using specialized test equipment.

WG-10 mechanics do preventative and scheduled maintenance on plant systems and equipment including boiler feed pumps, fuel oil pumps, air compressors, turbines, generators, boiler fixtures, and combustion fans. They balance, align, and maintain turbines, pumps, generators, compressors, and maintain ash shredding equipment and preheaters, and repair or replace flame gauges, controls, relief valves, and ignition devices. They troubleshoot electrical and pneumatic controls, and adjust and perform limited diagnostic checks on electronic control devices to detect sources of malfunctions of power boilers. Some WG-10 mechanics maintain and rework remote heating boilers and perform major overhauls of the entire system including the repair, replacement, and installation of boiler tubes, refractory linings, electronic and electrical controls, and associated components. They may work with complex burner management controls and examine electronic and electromechanical controls and support equipment for power boilers using infrared, ultraviolet, and related testing devices. These functions are based on a thorough knowledge of mechanical, electromechanical, and pneumatic principles and a working knowledge of electronics to repair and maintain power boilers and associated auxiliary and pollution control equipment, and a thorough knowledge of automatic and semiautomatic boiler management systems that use manual, electric, electronic, pneumatic, and mechanical controls. WG-10 work requires more skill and knowledge than WG-8 work since the equipment, components and controls are more complex and difficult to troubleshoot, repair, and maintain in the boiler plant systems. Work at this level typically requires a working knowledge of electronic controls and devices to identify equipment malfunctions, assess repair requirements, and replace or coordinate repairs for state-of-the-art control systems such as microprocessors and other solid state devices.

WG-10 mechanics have skill in making major repairs to pollution control equipment such as bag houses and electrostatic precipitators; to repair, install, connect, and adjust motors, relays, solenoids, switches, safety devices, thermostats, rheostats, aquastats, and other similar devices; and, to maintain, repair, and adjust hydraulic cylinders, speed governors, safety valves, feed water pumps, fuel lines, coal pulverizers, combustion fans, air compressors, and coal and ash handling equipment. They have skill in the use of stationary and industrial type power equipment such as power saws, lathes, and grinders to repair or install equipment; and use test equipment such as pyrometers, ohmmeters, and flow meters to identify defects, repairs needed, or preventive maintenance required.

The appellants' rationale, including their use of ultraviolet light in checking LOX piping and fitting work, attempt to make a link to the WG-10 level repair functions. While the appellants work in an industrial environment, the piping, sensing, and control system that they maintain and repair are substantially less complex than similar equipment and systems envisioned at the WG-10 level in the WG-5309 and related JGS's. They do not deal with the wide variety of complex equipment and controls present in boiler plants serviced at the WG-10 level, nor with the technical troubleshooting installation, repair and maintenance issues envisioned in WG-5309-10 work. The appellants' work does not require them to use the wide range of industrial power tools and testing equipment required to do work of WG-10 level difficulty and complexity. It is an established FWS job grade principle that the most recent official guidance takes clear precedence over previous guidance when conflicts arise. Therefore, the 1997 Electronics Mechanic, WG-2604 JGS provides guidance on how the 1992 WG-5309 JGS should be applied. WG-2604-8 work includes:

fabrication, installation, modification, overhaul, maintenance, troubleshooting, and repair of electronic equipment ranging from equipment of limited complexity such as subassemblies, printed circuit cards, and chassis to complete electronics systems. They independently operate automatic test equipment which has been programmed to a type of chassis or printed circuit board to locate and repair defective parts. Following detailed schematics, layout diagrams, and work instructions, they construct individual chassis and components of electronic equipment, they locate and repair malfunctions in defective circuit cards or chassis, such as audio frequency (AF) or radio frequency (RF) amplifiers, power supplies, oscillators, or other assemblies which are of limited design and functional complexity. They use standard hand tools and a variety of test equipment such as voltmeters, ohmmeters, signal/pulse generators, oscilloscopes, frequency counters, power supplies and a variety of test sets to locate and diagnose defective parts. They assist higher grade workers in the more complex fabrication, overhaul, modification, installation, troubleshooting, repair, and maintenance of complete systems, subsystems, and components as well as performing the more simple tasks such as removing and replacing defective parts and assemblies identified by higher grade workers. . . . They know how to locate and repair malfunctions and test completed work. They apply knowledge of construction practices of electronic equipment in order to recognize types and sizes of resistors, capacitors, wiring, and transistors; and follow signal paths through simple printed circuit and wired circuitry, recognizing actual circuit configurations which are shown in schematics and diagrams. They apply knowledge of standard test procedures, schematics, test/computer program instructions, technical manuals and technical change directives to complete assignments. They are skilled in the operation and applications of computerized automatic test equipment; oscilloscopes, signal/pulse generators, frequency counters, and voltmeters to follow specified check-out procedures and compare readings with specified values. They have skill in the use of hand tools such as drills, chassis punches, wrenches, soldering irons and micro soldering units to remove and replace circuit parts where accurate positioning, appearance, mechanical strength and electrical integrity are important.

The appellants use a range of testing equipment substantially more circumscribed than typical of WG-2604-8 work. They use multimeters and equivalent equipment, and not the computerized automatic test equipment, oscilloscopes, signal/pulse generators or other more complex test equipment typical of the WG-2604 trade. They do not use soldering irons or micro soldering units to perform their repairs. Furthermore, their responsibility for troubleshooting electronic controls is limited in that they telephone the contractor who leads them through troubleshooting Fluidmaster control problems. Their work on electrical and electronic components is limited to replacing plug-in chips and circuit boards. Electrical repairs also are performed on a limited range of equipment, e.g., replacing wiring on the vacuum pump, bolting and unbolting major components, entailing work that does not exceed work defined at the WG-8 level in the Electrician, WG-2805 JGS:

removing, replacing, tightening, splicing, soldering, and insulating defective wiring, controls, equipment, and fixtures such as broken and bare wiring, burned out switches and relays, loose connections and fitting. . . . [using] a small variety of test equipment, for example, test lamps, voltage testers, ammeters, and polarity testers.

We find the most complex repair work performed by the appellants does not exceed the WG-8 level as defined in the WG-5309 JGS, in their replacing of breakers, contacts, thermocouples, and heating coils, and their repacking and servicing of wheel bearings, valves, and similar equipment. This conclusion is confirmed by application of clarifying FWS job grading guidance in related JGS's.

Responsibility

WG-8 repairers work under the general supervision of a higher grade worker or supervisor and receive assignments orally or through work orders and instructions that may include blueprints, sketches, engineering drawings, or other written specifications. They decide the sequence of work, the general methods and techniques, the tools required, and complete assignments with limited supervision. They determine the condition of the equipment serviced and decide when to replace or repair worn or damaged items, and are responsible for maintaining heating equipment according to technical and safety specifications and environmental requirements. Work is subject to spot checks while in progress and upon completion for compliance with instructions and technical requirements.

In contrast, WG-10 mechanics make more complex technical decisions and judgments than WG-8 repairers since work at this level is performed on the most complex boiler systems and subsystems with limited technical guidance. They receive work assignments from a supervisor in the form of written or oral instructions that may include schematics, diagrams, drawings, or technical manuals. They generally accomplish work assignments with minimal supervision, and use judgment to plan equipment repairs and determine maintenance requirements. They are responsible for assuring that all safety procedures and environmental control safeguards are followed when working near hot surfaces, chemical compounds, or moving machinery. Their completed work is reviewed by the supervisor for adherence to established practices, outlined objectives, and technical requirements.

The level of responsibility described at each level in the WG-5309 JGS is directly related to the scope of work functions performed at that same defined grade level discussed previously in this decision. That is, WG-10 level responsibility is predicated on doing the full range of WG-10 level installation, repair, and maintenance work on equipment and systems with WG-10 level characteristics. Because the appellants perform their work on equipment that does not exceed the WG-8 level in difficulty and complexity, this factor may not be credited above that level. We find some of the appellants' more demanding electronic work that meets the WG-8 level is performed under more stringent controls than typical of the WG-8 level based on the step-by-step contractor guidance discussed previously in this decision.

Physical Effort and Working Conditions are the same at the WG-8 and WG-10 levels in the WG-5309 JGS. As discussed previously in this decision, these factors do not control the grading of skilled

trades and craft work and, thus, do not affect application of the WG-5309 JGS, as a whole, to the appellants' work.

We find the appellants' on-the-job training functions typical of those done by journey level trades personnel, and have considered this work fully in the preceding analysis. Reloading software in the ATG and similar ADP functions stressed by the appellants are functions performed by both FWS and General Schedule employees. For example, both Materials Handlers, WG-6907 and Supply Clerk, GS-2005 use automated supply system commands to do work. Therefore, this work cannot be construed as FWS work, and may not control the grading of positions allocated properly to the FWS.

Summary

Applying FWS mixed occupation and grading principles, we find the appellants' jobs are graded properly as Fuel Distribution System Worker, WG-5413-8.