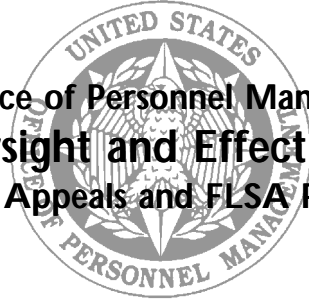


U.S. Office of Personnel Management  
Office of Merit Systems Oversight and Effectiveness  
Classification Appeals and FLSA Programs



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:** Airplane Flight Instructor  
GS-2181-12

**Organization:** Aviation Support Facility [name]  
[number] Aviation Brigade  
U.S. Army Reserve Command  
[location]  
Joint Reserve Base  
[location]

**OPM decision:** Airplane Flight Instructor  
GS-2181-12

**OPM decision number:** C-2181-12-01

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Robert D. Hendler  
Classification Appeals Officer

        /s/ 6/30/99        

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).

### **Decision sent to:**

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## Introduction

On October 9, 1998, the Philadelphia Oversight Division of the U.S. Office of Personnel Management (OPM) accepted a classification appeal from [appellant's name]. His position was classified as Helicopter Flight Instructor, GS-2181-12, Position Description (PD) #89334. The appellant, however, believed that he was doing the work assigned to PD #11122, classified as Airplane Flight Instructor, GS-2181-12, and that he was performing sufficient GS-13 grade level work to warrant classification as Aircraft Flight Instructor, GS-2181-13. The position is in the [number] Aviation Brigade, Aviation Support Facility, U.S. Army Reserve (USAR) Command, [location] Joint Reserve Base, [location]. We have accepted and decided his appeal under section 5112 of title 5, United States Code (U.S.C.).

## General issues

The appellant stated that the less complex aircraft referenced in his PD of record (#89334) were no longer assigned to his work site. They had been replaced by the turboprop powered C-12R in December 1994. The facility is scheduled to receive the UC-35 jet aircraft next year. He described his functions as a Standardization Pilot Instructor (SP), Pilot-in-Command (PC), Instructor Pilot (IP), Maintenance Test Pilot (MP), and Safety Officer, and "Assistance Contract Officer Representative." Effective January 17, 1999, the agency reassigned the appellant to PD #11122 as a result of its review of his current work.

In support of his appeal, the appellant stated that:

flight instruction involved in the aircraft at this facility is more demanding and complex than is called for in the standards for the GS-2181-13. This aircraft, C-12R, has EFIS (Electronic Flight Instrumentation System), FMS (Flight Management System) and GPS (Global Positioning System) that it uses for instrument flying. This is state of the art instrumentation that is found in newer airline and corporate aircraft. Many airline and military transport aircraft do not have this type of equipment aboard.

The appellant's rationale raises procedural issues warranting clarification. The classification appeal process is a de novo review that includes a determination as to the **current** duties and responsibilities assigned to the appellant's position and performed by the appellant while not in an active duty military status, and constitutes the proper application of PCS's to those duties and responsibilities. Therefore, future duties expected by the appellant may not be considered in the classification appeal process. All positions subject to the Classification Law contained in 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 comparison to the perceived demands of other positions that may or may not be classified correctly, e.g., the operation of other military and civilian planes that have different instrumentation suites, are not authorized for use in determining the classification of a position.

Like OPM, the appellant's agency must classify positions based on comparison to OPM standards and guidelines. Section 511.612 of 5 CFR, requires that agencies review their own classification decisions for identical, similar, or related positions to insure consistency with OPM certificates. Thus, the agency has the primary responsibility for ensuring that its positions are classified consistently with OPM appeal decisions.

The appellant claims that "The instrument flight instruction involved with the aircraft at this facility is much more demanding and complex than is called for in the standards for GS-2181-13." The adequacy of grade-level criteria in OPM standards is not appealable (section 511.607 of title 5, CFR). All OPM GS PCS's are consistent with the definitions for the work at each of the 15 grades as established in the law. These definitions are based on the difficulty and responsibility of the work at each level and the qualifications required to do that work. All occupations change over time, but the fundamental duty and responsibility patterns and qualifications required generally remain stable. Thus, careful application of the appropriate PCS to the work the appellant performs should yield the correct grade for the position. Any duties not specifically referenced in the PCS can still be evaluated by comparison with similar or related duties that the PCS does describe, and with the entire pattern of grade-level characteristics.

We have evaluated the work assigned by management and performed by the appellant according to these position classification requirements. In reaching our decision, we carefully reviewed the information provided by both the appellant and his agency, including the appellant's PD of record, that he and his supervisor agree contains the major duties that he performs as clarified below. We conducted an on-site audit with the appellant, and interviews with his immediate supervisor, [name], and CW4 [name] Brigade Standardization Officer, on June 11, 1999. We also considered the additional information provided by the appellant and his agency at our request, and information we obtained from the Federal Aviation Administration (FAA). The record shows that the PD contains the major duties and responsibilities assigned by management and performed by the appellant and is hereby incorporated by reference into this decision.

### **Position information**

The PD of record states that the appellant works as an Airplane Flight Instructor, a USAR Standardization Instructor Pilot and/or an Instrument Flight Examiner (IE) on the C-12 aircraft, and others when assigned for such operations as "tactical, instrument flight, and advanced flight procedures." The first major duty, occupying 40 percent of the work time, includes training in "basic instrument flight techniques under Instrument Flight Rule (IFR) and Visual Flight Rule (VFR) conditions." This includes training in emergency procedure for "engine failures, malfunctions of hydraulic and electrical systems, etc." The appellant's immediate supervisor stated that the first duty should be changed to 35 percent, and should include: (1) emergency procedures for high altitude flight and Electronic Flight Instrument Instrumentation System (EFIS); and, (2) training aviators in both basic and advanced instrument techniques using such complex instrumentation systems as the EFIS, and Flight Management System (FMS) under IFR

and VFR rules and conditions. The training and evaluation of pilots and other instructors entail “a marked degree of hazard.”

The second major duty, occupying 20 percent of the work time, includes training “in advanced instrument flight techniques such as Nondirectional Beacons (NDB), Very High Frequency Omni Range (VOR), Instrument Landing System (ILS), Ground Control Approach (GCA), tactical instrument approaches, and flights over the Federal Airways under IFR and VFR conditions.” The appellant’s immediate supervisor stated that this duty should be changed to 35 percent, and should include: (1) training in such advanced instrument flight techniques as Global Positioning System (GPS), Flight Director, Weather Radar and high altitude flight over Federal airways; (2) training to operate in a variety of different areas, including familiarity with international flight procedures, terminology, and air traffic control procedures “congested international airports where it takes a high degree of vigilance”; and, (3) conducting ground training in advanced instrument techniques. The supervisor also stated the first two duties “almost happen at the same time so it could be said that almost 70% of the time is spent doing flight training, evaluations, and ground training.”

The third duty, occupying 20 percent of the work time, involves responsibility for the ASF safety program, including: (1) maintaining a file of safety publications and information; (2) disseminating safety information, monitoring and advising facility and unit personnel on safety; (3) formulating and updating preaccident plans, and maintaining program forms and records; (4) conducting program liaison with other organizations; and, (5) sitting on safety and policy boards, groups, and committees as necessary. Neither the appellant nor his supervisor disagreed with the accuracy of this duty.

The fourth duty, occupying 15 percent of the work time, includes: (1) serving as a member of aviation status boards; (2) conducting conferences with and providing technical advice to unit commanders, instructors and USAR Flight Standardization Boards to determine more efficient methods of standardization and recommending changes to instruction programs and syllabuses; (3) orienting newly assigned personnel and serving as the permanent source of information; (4) assisting in writing standard operating procedures; and, (5) keeping abreast of new developments in flight training methods and procedures. The appellant’s supervisor stated the time spent should be reduced to 5 percent. The fifth major duty of test flying aircraft after maintenance (maintenance pilot-MP) occupies 5 percent of the work time. Neither the appellant nor his supervisor took issue with this information.

Both the appellant and his supervisor agree that the tactical procedures included under Major Duties are not performed. In addition, the appellant does not perform tactical instrument approaches as described under the second major duty.

The appellant provided workload data from January 1998 through June 1999 showing the number of hours he functioned as an IP, MP, SP and PC. He stated that when PC, he typically functions as an instructor for less seasoned pilots. These pilots receive basic fixed wing training and

become C-12 (D series) qualified at Fort Rucker. The two-week, 17 hour training program concentrates on instrumentation after the fourth day. R series qualification takes a minimum of one hour. With these skills in place, the appellant stated he concentrates on instrumentation training. The appellant described basic IFR as learning how to take off, climb, turn and descend by using instruments. Students typically prepare two hours on the ground for each hour spent in the air. Each year all pilots must be evaluated during their birth month quarter, and may take up to 60 hours for refresher training and check rides. Ground instruction includes computer simulation exercises to prepare the pilot to use the C-12 navigational aids. The EFIS allows the pilot to access up to five levels of data on each of two TV screens; one for the pilot and one for the copilot. The FMS permits the pilot to program all flight legs before takeoff. The plane's air data computers determine wind speed and direction and drift angle, and correct the course automatically.

The appellant stressed the risk of instructing pilots in a training situation because the instructor must look at the instruments being handled by the pilot under instruction and maintain visual out-of-plane awareness at the same time. He stated the mission of flying passengers, performed in the dense air space east of the Mississippi River and preponderantly in the northeast corridor from Maine to Virginia, further increased instructional and operational risks. IFR operations cause greater stress and pressure than VOR because the pilot must press buttons and talk to air traffic control at the same time. Instructional risk is further increased because the instructor never knows what the student may do.

### **Series, title, and guide determination**

The agency determined the appellant's position is covered by the Aircraft Operations Series, GS-2181, is titled Airplane Flight Instructor, and is graded using the GS-2181 PCS, with which the appellant agrees, and we concur. Accordingly, the position is allocated properly as Airplane Flight Instructor, GS-2181.

### **Grade determination**

The published GS-2181 is written in narrative format. Grade determination is based on three interrelated factors: the aircraft operated, the nature and purpose of the assignments, and the degree of hazard. The final grade determination is made by considering these three factors simultaneously. The PCS also must be applied within established classification principles and practices. The Introduction to the PCS's states that:

Some positions also 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 recurring 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 of knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

The PCS requires the grade level criteria be applied within the context provided in its introductory portions. These include the fact that the various characteristics of aircraft, e.g., weight, speed, propulsion system, or performance capabilities, are not precisely quantifiable for use as grade level benchmarks. Flying a given aircraft may span two or more grade levels due to the influence of the degree of hazard involved, and/or the nature and purpose of the assignments. The descriptive material on groups of aircraft illustrates typical characteristics of the aircraft that impact the knowledge and skills required by pilots. The PCS states that individual aircraft may not fit precisely all of the characteristics described, and users are cautioned against emphasizing one characteristic of aircraft as a basis for classifying a position to a particular grade level, or making a mechanical linkage of a particular aircraft to a specific grade level.

The nature and purpose of assignments also influence the level of pilot skills. For example, a greater degree of skill is required to carry passengers at night to remote and confined spaces, such as forest fire sites, than is required to fly the same aircraft during daylight hours to carry passengers between airports. The PCS states that assignments consisting solely of flying aircraft from one point to another impose few, if any, demands on the pilot beyond the application of basic pilot knowledge and skills. The degree of hazard must be approached similarly. All pilots are required to know and demonstrate skill in executing appropriate emergency procedures, and are required to know the pertinent limitations of the aircraft, operations that must be avoided, and the safety precautions to be observed. We must apply the grading criteria in the GS-2181 PCS consistent with these requirements.

The appellant's rationale is preponderantly based on four major points: (1) the C-12R is operated at 14,500 pounds and cruises at 265 knots, thereby exceeding the 12,500 pound and 250 knot cap for a small aircraft; (2) the instrumentation suite of the C-12R is more sophisticated and technically more demanding than is even described at the GS-13 grade level of the PCS; (3) the degree of hazard is increased by operating in the congested Northeast corridor and other congested airports, training pilots with limited air time and training, performing training in PC status; and,

(4) the demands of instructing and evaluating other instructor pilots while in SIP status when performing the most difficult and hazardous maneuvers all support upgrading the position.

Duties and responsibilities assigned to a position flow from the mission assigned to the organization in which it is found. The positions created to perform an assigned mission must be considered in relation to one another; i.e., each position reflects part of the work assigned to an organization. Thus, the duties and responsibilities assigned to the ASF Willow Grove and the appellant's position may not be considered in a vacuum.

The C-12R is a Beech Super King Air 200C twin-engine turboprop typically used to transport passengers and limited amounts of cargo. The mission of the appellant's activity is to provide "command and control enhancement and other operational airlift support operations as directed by supported command." This preponderantly involves transporting passengers at the rank of Colonel and above, and dignitaries, in the Northeast corridor. Policy requires that when passengers are carried, the aircraft will use the autopilot to enhance comfort and safety. It is not used for tactical missions and, when used for military missions, will not go into the ground fire area. It is used most of the time to transport generals and other high rank personnel no further than the rear division area. This is the mission for which the appellant provides training. The task list (DA-Form 7120-R, August 1995) for training does not include evaluation requirements for aircraft engaged in aerobatic maneuvers, close formation flying, high speed low-level flight, evasive maneuvers, or similar operational demands. While the PCS does not directly address all aspects of C-12R instrumentation, the complexity of IFR operation is recognized and described on page 29 of the January 1988 published version:

very high frequency omnidirectional ranges, tactical air navigation facilities, instrument landing systems, nondirectional beacons, precision approach radar systems, surveillance radar and air traffic control radar beacon systems, microwave landing systems, Loran C, global positioning systems, and communications systems.

While the operating weight of 14,500 pounds and the cruising speed of 265 knots exceed the typical small craft threshold, that threshold is not materially exceeded. Our review of FAA Type Certificate Data Sheet information defines small, multi-engine aircraft as:

All multi-engine fixed wing airplanes of 12,500 pounds or less maximum certificated takeoff weight. Also includes normal category with SFAR 41 certification, propeller drive, multi-engine, fixed wing airplanes in excess of 12,500 certificated weight and commuter category, propeller driven, multi-engine, fixed wing airplanes of 19,000 pounds or less maximum certificated takeoff weight.

This language overlaps with the definition of large, multi-engine fixed wing airplanes of "more than 12,500 pounds maximum certificated takeoff weight." Both the small and large, multi-



engine aircraft lists include the C-12R, under a single type certificate data sheet; i.e., A24CE, Rev 69. Other information provided by the FAA shows that the ASF Willow Grove operates a version with limited modifications, e.g., it has a cargo door. This must be contrasted with other more significantly modified versions, e.g., those operating at approximately 16,000 pounds carrying specialized electronic equipment. Therefore, we are persuaded that the C-12R operated by the appellant is identified properly as a light twin-engine turbine-powered airplane for purposes of applying the GS-2181 PCS.

Assignments characteristic of the GS-12 grade level work include: (1) instructing or evaluating students or rated pilots in the flight techniques required to fly tactical operations, such as short field takeoffs and landings, flight formations, or aerobatics in light single- or twin-engine airplanes or helicopters under visual flight rules; (2) flying light single- or twin-engine airplanes or helicopters at low altitudes and speeds over unfavorable terrain with responsibility for making patrols and operating from confined or isolated areas; (3) flying heavy multi-engine transport airplanes to various destinations, using instrument flight rules, for the purpose of transporting supplies and equipment; (4) flying variety of light twin-engine airplanes or helicopters to a variety of locations, some of which are unfamiliar, for the purpose of transporting passengers, including both day and night flying and the use of instrument flight techniques, generally in favorable weather conditions; and, (5) conducting functional flight checks of light airplanes or helicopters following repair, maintenance, or the installation of approved modifications to aircraft systems.

At the GS-12 grade level, flight instructor assignments for light single- or twin-engine airplanes involve training or evaluating students in the advanced techniques required, for example, in short-field takeoffs and landings under maximum loads, flying in formation, performing evasive maneuvers, and aerobatics. Students are taught the procedures to use in emergencies such as engine failures and malfunctions of hydraulic and electrical systems over rough terrain, e.g., hills and forests both day and night. Assignments at this level include responsibility for reviewing students' basic training and determining their ability to progress to further advanced courses; determining through evaluation if students should continue or be eliminated; and recommending additional training for students whose progress is unsatisfactory. Assignments at this level are distinguished from those at the GS-11 grade level primarily in that very advanced techniques are taught at this level. As stipulated in the PCS, responsibility for also training or evaluating students in the basics of instrument flight; i.e., training pilots to takeoff, fly straight and level, execute turns, climb, descend, and recover from unusual altitudes, and fly prescribed patterns using basic flight instruments controlling attitude, altitude, speed, and direction, will not remove a position from the GS-12 grade level. Such assignments entail a substantial degree of hazard. In addition to the factors influencing hazard in instructor work, assignments at this level involve flight maneuvers and techniques which are more difficult to perform safely and consequently entail a higher degree of risk.

The appellant performs a substantial number of routine flights to familiar locations described in the second work example at the GS-11 grade level. While the appellant does not routinely train assigned pilots in the range of advanced techniques described above, he performs the full range

of instrument flight functions typical at the GS-12 grade level. As at the GS-12 grade level, he routinely flies the C-12R to a variety of locations, some of which are unfamiliar, to transport passengers under conditions equivalent to those described above. The GS-2181 PCS does not measure hazard based on the volume of air traffic between these points as the appellant suggests. As the GS-12 grade level, the appellant's flight test assignments involve performing functional check flights of light twin-engine airplanes after repair or replacement of damaged or worn components, extensive maintenance has been performed, or approved modifications have been made to the aircraft systems.

In contrast, assignment characteristics of the GS-13 grade level involve application of the knowledge and skills required to: (1) instruct or evaluate student pilots in advanced instrument flight technique; to provide combat training to rated pilots in the operation of a variety of advanced military aircraft; to instruct fixed or rotary wing pilots in methods of instruction and evaluate their proficiency to engage in flight instruction; to instruct and evaluate test pilots, to perform special projects involving a comparable responsibility and skill; or combinations of these assignments; (2) fly heavy twin-engine or multi-engine aircraft equipped with electronic devices used to inspect air navigational facilities, and to evaluate the safety and practicability of terminal and en route flight procedures; (3) fly heavy multi-engine airplanes on extended flights, with responsibility for transporting passengers and/or cargo to and from a wide variety of domestic or foreign points; and, (4) test aircraft with substantially modified systems.

The appellant highlighted selected sections and phrases of the GS-13 grade level criteria. These include instructing or evaluating student pilots in "advanced instrument flight technique" and "instruct fixed or rotary wing pilots in methods of instruction and evaluate their proficiency to engage in flight instruction." The first phrase refers to instrument flight instructor assignments in which advanced techniques and procedures:

include training in instrument flight planning, precision handling and maneuvering of the aircraft, instrument flight using aircraft navigational instruments and systems (e.g., radio directing and position finding systems) in conjunction with air navigational aids (e.g., omnidirectional radio ranges), area navigation, air traffic control operations and procedures and pilot interface with those activities, instrument approach and departure procedures, holding procedures, and use of instrument landing systems. Students are also taught emergency procedures used in, for example, missed approaches and radio failure. The instructors plan, schedule, and conduct cross-country training flights which require reliance on precision instrument flight techniques because they involve flying along the Federal airways. As at lower levels, the instructors grade and evaluate progress of their students. These assignments entail a marked degree of hazard due to the demands for concentration characteristic of instrument flight.

This definition is not synonymous with advanced instrument operations used in basic flight school training that limits basic training to taking off, landing, and other fundamental aircraft control

functions. Although the appellant provides instruction in a wide range of instrumentation use, it is not for the navigational complexities envisioned as advanced instrument flight techniques within the meaning of PCS. Rather, it is for the routine point-to-point transportation of passengers, and dealing with typical emergency situations as discussed previously.

The appellant also highlighted: “Other flight instructor assignments typical of this level entail providing refresher and mission related training to pilots in the reserves flight training programs . . . .Instructors train pilots in the full range of aircraft maneuvers or capabilities necessary to accomplish the unit’s flight mission.” The context of this work assignment example, however, is substantially different from the appellant’s in that it is for instruction ranging:

from high performance jet fighters to heavy multi-engine transport airplanes. Assignments cover both ground instruction and in-flight training and evaluation. Instructors train pilots to fly the full range of aircraft maneuvers or capabilities necessary to accomplish the unit's flying mission. Combat mission related training for fighter pilots requires extensive aerobatic maneuvers, close formation flying, high-speed low-level flight, aerial refueling, two or more ship aggressor and defensive combat, and practice over gunnery ranges with heavy ordnance. Transport and tanker pilots are trained to deliver and airdrop cargos and personnel or rendezvous with and refuel airplanes within the United States and overseas. Overseas flights can entail transporting very heavy loads into short or marginal airstrips or shepherding and refueling fighter formations in long distance delivery operations. The instructor monitors progress during training, and advises when the pilot is considered ready for formal flight evaluation. Initially, assignments may involve a minimum degree of hazard. As the instruction involves more difficult maneuvers (e.g., low-level high-speed gunnery practice or high-gravity combat maneuvers), the hazard increases to a substantial degree.

As discussed previously, these work assignments are not part of the ASF Willow Grove mission and are not part of the training demands of the appellant’s position.

The appellant also highlighted portions of another typical GS-13 grade level assignment; i.e., training and evaluating rated pilots in methods of instruction. Assignments that involve training other instructors include, in addition to in-flight evaluation, monitoring classroom instruction to evaluate other instructors' techniques and procedures; checking instructors' grade books to train them in correct grade book procedures; formulating lesson plans and instructional material used in classrooms; and revising methods of instruction and other training procedures in use. Also, characteristic of this level is the performance of periodic in-flight examination of other instructors as well as evaluations of the instructor's subject-matter knowledge. Some positions may have an additional responsibility for evaluating an organization's performance in terms of the application of safe and accepted flight procedures, and recommending corrective action or additional training. Assignments to train and evaluate other instructors entail a marked degree of hazard. While those being trained are rated pilots, the flight evaluations include the most difficult and hazardous

maneuvers and procedures. At this level, instruction in flight test techniques is for flight testing characteristic of this level or lower levels. Flight test instruction involves a substantial degree of hazard.

The appellant does perform some aspects of GS-13 grade level instructor evaluation work as part of the fourth major duty, but these functions are not performed a sufficient portion of his work time to control the classification of the position.

The appellant also highlighted portions of the first flight assignment work example at the GS-13 grade level; i.e., flying overseas, requiring familiarity with international flight procedures and terminology, and the air traffic control procedures applicable in foreign countries. The stated context for this work example, however, is for flying heavy multi-engine airplanes (including those classed as "jumbos") over very long distances to a wide variety of locations in this country and overseas for the purpose of transporting cargo and/or personnel. These flights typically involve distances that are significantly greater than those for similar assignments at the next lower grade. Since such flights typically involve extended over-water flying, they are characterized by a marked degree of hazard. These assignments are distinguished from similar work at the GS-12 grade level primarily by the weight of aircraft flown and by the variety of different areas and destinations to which flights are made.

The appellant's position may not be credited as performing this assignment. First, the appellant's flights overseas were in his military capacity and, as discussed previously, may not be considered in classifying his position. Second, the appellant does not operate the type of craft that would present the demands in the cited work assignment example.

We find that the appellant's collateral non-pilot duties are not major duties within the meaning of the position classification process and, therefore, do not impact the overall grade level worth of the position.

### *Summary*

Based on the preceding analysis, we find the appellant position is properly graded at the GS-12 grade level.

### **Decision**

The appellant's position is classified properly as Airplane Flight Instructor, GS-2181-12.