

**OFFICE OF PERSONNEL MANAGEMENT
ATLANTA OVERSIGHT DIVISION
ATLANTA, GEORGIA**

CLASSIFICATION APPEAL DECISION

Under section 5112(b) of title 5, United States Code

Appellants: [the appellants]

Position: Air Traffic Assistant, GS-2154-8

Organization: Headquarters and Headquarters Detachment
1st Battalion
223d Aviation Regiment
Aviation training Brigade
U. S. Army Aviation Center
Fort Rucker, Alabama

Decision: Air Traffic Assistant, GS-2154-7
(Appeal denied, positions downgraded)

OPM Decision Number: C-2154-07-01

Robert P. Gill
Classification Appeals Officer
Signed By

September 13, 1996
Date

Case No. 215407

Background

On May 29, 1996, the Atlanta Oversight Division, Office of Personnel Management, accepted an appeal for positions of Air Traffic Assistant, GS-2154-8, located in [The Department of Army]. The seven appellants are requesting that their positions be changed to Air Traffic Control Specialist (Station), GS-2152-9. On June 22, 1995, the Defense Civilian Personnel Management Service (CPMS) issued an appeal decision granting the appellants' requested classification. That appeal decision was reversed by a second CPMS decision dated March 1, 1996, which placed the appellants' positions in the GS-2154 series.

The appeal has been accepted and processed under section 5112(b) of title 5, United States Code. This is the final administrative decision on the classification of the positions subject to discretionary review only under the limited conditions and time outlined in part 511, subpart F, of title 5, Code of Federal Regulations.

Sources of Information

This appeal decision is based on information from the following sources:

1. A letter dated May 22, 1996, from the appellants' representative, appealing the classification of their positions.
2. The agency's letter of June 27, 1996 (received July 30, 1996), providing position and organizational information.
3. A telephone interview with Ms. Carol Pike, the servicing classifier, on August 21, 1996.
4. A telephone interview with [the claimants' rep.], representing all the appellants, on August 22, 1996.
5. A telephone interview with [the appellant's supervisor], the appellants' immediate supervisor, on August 23, 1996.

Position Information

The appellants are assigned to Position Number 12996, which was classified on October 24, 1985. The appellants, supervisor, and agency have certified to the accuracy of the position description.

The appellants work rotating shifts to provide assistance to pilots by receiving and reviewing flight plans, assisting pilots in correcting flight plans when necessary, and providing information on changing weather conditions. They record flight plans in the automated system and provide appropriate notifications to air traffic control facilities.

They maintain flight data on aircraft departing from and returning to the airfield and on planned arrivals. They provide updated weather reports and weather warnings to aircraft by radio. They post Notices to Airmen (NOTAMs) for pilot information and prepare local NOTAMs as needed (e.g., concerning the operational status of local navigational aids). They assist in aircraft emergencies by notifying crash and rescue units and by initiating search and rescue operations. They maintain information, materials, and forms for use in flight planning. During periods when the air traffic control tower is closed, the appellants provide advisory services to aircraft, including field and weather conditions, runways in use, and the location of known air traffic.

The appellants receive direction from a military supervisor who makes general assignments and provides guidance on new or changed procedures. The supervisor makes assignments to specific tasks within the unit on a weekly basis. The appellants perform their assignments independently within the parameters of established procedures and refer unusual situations and those not covered by guidelines to the supervisor for guidance or decision. The supervisor spot checks the work for adequacy and compliance with established procedures.

The appellants' positions require knowledge of Federal Aviation Administration (FAA) and Army regulations and procedures governing the preparation and filing of flight plans. The work also requires knowledge of radio procedures and ability to transmit weather warnings and other information necessary to the safe operation of aircraft within their area of responsibility. The positions do not require FAA certification or training.

The appellants contend that they perform essentially the same work as positions classified as Air Traffic Control Specialist (Station), GS-2152-9, at other military installations. However, they provided no information to support their contention. Current law (§5107 of title 5, United States Code) requires that positions be classified solely by comparison to published classification standards. Consequently, other means of evaluating positions, including comparisons to other positions, are not appropriate.

Standards Referenced

Dispatching Series, GS-2151, February 1963.
Air Traffic Control Series, GS-2152, June 1978.
Air Traffic Assistance Series, GS-2154, July 1990.
Meteorological Technician Series, GS-1341, June 1971.

Series and Title Determination

The agency placed the appellants' positions in the Air Traffic Assistance Series, GS-2154. The appellants believe that their positions are properly placed in the Air Traffic Control Series, GS-2152.

Series:

The Air Traffic Control Series, GS-2152, includes positions concerned with: (a) the control of air traffic to insure the safe, orderly, and expeditious movement along air routes and at airports when a knowledge of aircraft separation standards and control techniques, and the ability to apply them properly, often under conditions of great stress, are required; (b) the providing of preflight and in-flight assistance to aircraft requiring a knowledge of the information pilots need to conduct safe flights and the ability to present that information clearly and concisely; or (c) the development, coordination, and management of air traffic control programs. Positions in this occupation require an extensive knowledge of the laws, rules, regulations, and procedures governing the movement of air traffic.

The appellants believe that their positions are essentially identical to the "station" specialization, which is described on pages 11 through 16 of the GS-2152 standard. The standard states that employees in flight service stations:

- ▶ brief pilots on weather conditions, advise on the existence or development of potentially hazardous weather conditions, suggest alternate routes, and, when appropriate, recommend that flights not be attempted;
- ▶ based on knowledge of airway route structures and air traffic procedures, assist pilots in planning the route of flight, making flight computations, filing flight plans, and obtaining clearances to fly in controlled air space;
- ▶ develop, disseminate, and monitor the currency of Notices to Airmen (NOTAMs);
- ▶ provide current and forecast weather data and flight planning information to en route aircraft, and request and disseminate pilot reports of significant weather conditions; and
- ▶ provide assistance to pilots who are lost or are in an emergency situation, and initiate search and rescue operations to locate aircraft which fail to report their arrival within prescribed time limits.

The GS-2152 standard identifies certain specific knowledges and skills required of employees in flight service stations. These include:

- ▶ thorough knowledge of aviation weather including causes, effects, and dynamics of weather systems;
- ▶ ability to interpret and interpolate a variety of weather data into information useful to pilots;
- ▶ ability to determine the capabilities of a pilot to assure that the information presented is such that the pilot is aware of conditions expected and how they will affect the flight;
- ▶ detailed knowledge of the station's assigned area of responsibility, including operational features of assigned airports, location and performance characteristics of associated air navigational facilities, airway structures and routes, topography and factors affecting weather, air traffic control procedures pertinent to the area, applicable airspace restrictions, and emergency service procedures;
- ▶ detailed knowledge of procedures related to flight handling, routing, airways and airspace structures;
- ▶ general knowledge of the performance characteristics of a wide variety of aircraft;
- ▶ skill in communicating effectively with pilots of all level of experience in a variety of situations;
- ▶ ability to provide emergency service to aircraft in distress; and
- ▶ ability to coordinate actions with other specialists and related air traffic facilities.

The GS-2152 standard indicates that the knowledges, skills, and abilities required may vary slightly in kind based on the demands of the particular work station. In addition, the qualifications standard for the GS-2152 series states that all persons in the series must possess a Federal Aviation Administration (FAA) certification for the type of facility in which they are employed. The qualifications standard further states that applicants for positions in the GS-2152 series must meet certain physical standards at the time of their initial appointment in the series.

The appeal record shows that the appellants' perform work which bears some similarity to that described for the "station" specialization in the GS-2152 series. For example,

the appellants review and record flight plans, advise on hazardous weather conditions, and provide assistance to pilots in emergencies. However, there are several significant differences between the appellants' positions and the work described in the GS-2152 standard. The appellants do not provide weather briefings to pilots, although they do relay weather updates and warnings. They typically do not assist pilots in planning flights, but they do review flight plans. They do not provide weather information to en route aircraft, and they do not provide assistance to lost pilots. These differences in duties result in differences in required knowledge and skills. For example, the appellants are not required to understand the causes and dynamics of aviation weather to the extent described in the GS-2152 standard. They are not expected to know the operating characteristics of various aircraft, or have the ability to perform flight computations. The appeal record also shows that the appellants' positions do not require the FAA certification for flight service stations, and did not require the appellants to meet the necessary physical requirements at the time of their initial appointment. Therefore, we conclude that the appellants' positions are not properly classified in the GS-2152 series.

The Dispatching Series, GS-2151, includes positions which supervise or perform work involved in dispatching or scheduling motor vehicles, trains, aircraft, or vessels used for the transportation of passengers, mail, equipment, or supplies. The duties of these positions are primarily of an office or clerical nature and involve assigning vehicles, keeping records and reports, and providing route and destination information and instructions to the drivers, engineers, or pilots.

The appellants' positions also bear a resemblance to the work described in the GS-2151 series, in that they perform some work of a clerical nature, such as keeping reference materials up-to-date, and they do provide information and assistance to pilots. However, they do not assign aircraft or provide route and destination information in the sense intended by the GS-2151 series. For example, they do not direct pilots to fly to a specific aircraft to a specific destination, nor are they concerned with the characteristics and capacities of the aircraft flown by the pilots. Consequently, the work performed by the appellants is sufficiently different from that covered by the GS-2151 series to exclude their positions from that series.

The Air Traffic Assistance Series, GS-2154, includes positions that involve the performance of work in support of air traffic control functions. Positions in this series require a knowledge of and skill in applying air traffic control procedures, but do not require knowledge of aircraft separation standards or the ability to provide preflight or in-flight safety or weather briefings. Positions in the GS-2154 series do not require FAA certification.

The GS-2154 series best matches the work performed by the appellants and the required knowledge and skill. Like the GS-2154 series, the appellants must possess a

knowledge of air traffic control procedures to perform their duties, but do not require the knowledge necessary to separate aircraft or to provide safety or weather briefings to pilots. Consequently, the appellants' positions are properly placed in the GS-2154 series.

Title:

The GS-2154 standard authorizes the title of *Air Traffic Assistant* for nonsupervisory positions in that series.

The appellants' positions are properly titled and coded as Air Traffic Assistant, GS-2154.

Grade Determination

The GS-2154 standard does not include grading criteria, and directs the use of other standards which include grade level criteria for similar kinds of one-grade interval work. The agency used the grade level criteria in Part II of the GS-1341 standard, which covers positions at or above the GS-4 level. The GS-1341 standard measures technical work in collecting and disseminating meteorological information based on practical and technical knowledge and skill. This work is analogous to that performed by the appellants in several respects, since their recurring assignments also involve the collection and dissemination of information based on practical and technical knowledge. We find that Part II of the GS-1341 standard provides a reasonable basis for evaluating the appellants' positions.

Part II of the GS-1341 standard is written in narrative format and uses two factors for evaluation purposes: *Responsibility* and *Complexity*. The positions are evaluated as follows:

Responsibility:

This factor includes the kind and degree of supervisory, technical, and administrative controls over the work performed, the responsibility for making recommendations and decisions, the extent of personal contacts and commitment authorities, and the availability, applicability, and utility of instructional and informational guides and precedents. This factor is described in three levels, I through III, which cover a range extending from the limited responsibility found at Level I to the extensive responsibilities expected of and assumed by the mature, experienced technician, as described in Level III. The agency evaluated this factor at Level II.

Level II differs from Level I primarily in: (1) the requirement for meaningful personal contacts; and (2) the opportunities to make recommendations and decisions. The

supervisor provides instructions covering any new procedures to be used, departures from established work practices and any complications or special problems that can be anticipated. Completed work is spot checked to assure that the critical aspects of the work have been accomplished satisfactorily and that the decisions and recommendations made are technically sound. Personal contacts usually involve the collection or presentation of technical information that is mostly factual and straightforward but which requires some interpretation or supplementation to meet user requirements. The technician makes recommendations and decisions that involve routine, noncontroversial matters, e.g., adaptive forecasts, that are adequately covered by available guidelines or precedents.

Level II is met. Similar to this level, the appellants work within a framework of established regulations and standards issued by the FAA and the Army and standard operating procedures issued by their superiors. The appellants have no authority to significantly deviate from these procedures without supervisory approval, except in emergency situations where a supervisor is not available. The supervisor spot checks work much as described at Level II. Within the framework of established procedures, the appellants have personal contacts with pilots possessing widely varying levels of skill. These contacts are made to review flight plans for completeness and accuracy and to recommend changes to pilots when necessary. The appellants' personal contacts involve factual information covered in established procedures. For example, if a pilot plans to enter an established airway at an unauthorized altitude, the appellants will point this out to the pilot and recommend an alternative. The intent of Level II is met.

Level III differs from Level II primarily in: (1) increased freedom from technical supervision; (2) added requirements for the planning and scheduling of assignments; and (3) additional demands for resourcefulness and technical judgments placed upon the technician to interpret or adapt guidelines, instructions, and precedent material. At this level, the supervisor provides very general instructions concerning the broad objectives of the assignment, advice on any unusual conditions or anomalies and general administrative matters such as new reporting formats, timing changes, equipment problems, etc. The technician receives little or no technical assistance during the course of the assignment. Review typically consists of an overall evaluation of the adequacy and timeliness of the completed work that is conducted when an identifiable unsatisfactory trend has developed over a substantial period of time. The relative freedom from technical supervision typically found at this level includes work situations requiring, on either a fixed or rotational basis, the performance of work when supervision is entirely absent or not readily available. Level III responsibility covers, but is not limited to, situations where technicians make unreviewed decisions alone on a shift, e.g., to provide warnings of hazardous weather based on their judgment concerning the effect of changes in weather elements. They decide whether to confirm warning conditions by waiting for additional reports or to alert concerned public officials

immediately. Personal contacts at Level III typically are extensive and important, constitute a significant aspect of the work, and usually involve the presentation and discussion of complicated technical material that requires considerable supplementation, interpretation, or elaboration to meet user requirements. The technician makes recommendations and decisions that are technically complex but largely covered by precedents or guideline material. Instructions and informational materials are usually available but are complicated and require interpretation or adaptation in their application to specific work assignments. In many instances, however, demanding production or operational requirements may preclude or severely restrict the practical availability of these guides.

Level III is not met. Although the appellants receive little or no technical supervision in the course of their daily assignments, their work is covered by published regulations, standards, and standard operating procedures which are directly applicable to the work. The appellants have no authority to deviate from their guidelines to any significant extent. Also unlike Level III, the appellants have a military supervisor available on each shift except weekends. While they are expected to exercise some judgment, such as in determining when to provide weather warnings to pilots, that judgment is restricted to passing on factual information provided by others, not to independently determining the nature of the information to be provided. There is little opportunity for the appellants to supplement or elaborate on the information provided, nor is there a significant opportunity to interpret or adapt guidance materials. The intent of Level III is not met, and this level is not creditable.

This factor is evaluated at Level II.

Complexity:

This factor includes the nature, variety, complexity, and difficulty of the work assigned and the knowledges, skills, and abilities required to perform successfully the duties of the position. This factor is described by six degrees, ranging from assignments of limited scope and difficulty involving the performance of relatively simple repetitive tasks found at Degree A to the complicated, technically demanding assignments which characterize the higher grade levels. Illustrative assignments included under the various degrees are not all-inclusive. Other elements or special conditions which have a definite and identifiable impact on the complexity of the work performed, should be carefully considered in determining the proper complexity degree. The agency evaluated this factor at Degree D. We find that Degree C is more appropriate.

At Degree C, assignments require the application of work methods, techniques, and procedures that are significantly more complex and less standardized than at Degree B. The primary difference is that at Degree B the work requires the use of established standard methods, techniques, and procedures. Work at Degree C requires

considerable planning, scheduling of work sequences, and changing of plans while the work is in progress to adjust to conditions that could not be predicted adequately or program changes that could not be anticipated at the initiation of the assignment. Degree C requires a great deal more skill and judgment than Degree B, because the technician must plan and sequence assignments, adjust or adapt work methods to specific requirements of the assignment, and, in many instances, set up, operate, and maintain more complex equipment and instrumentation.

Degree C is met. Although the appellants operate within the framework of standardized procedures, they exercise some judgment and discretion in determining the appropriate course of action. For example, in reviewing flight plans, the appellants must consider the experience level of the pilot, the complexity of the flight plan, and similar factors in deciding how to provide assistance and information. Changes in weather or the operational status of local navigation beacons may require changes in procedures. A determination that an aircraft is overdue requires specific actions on the part of the appellants which are not part of the normal work routine. This is similar to the changes described at Degree C resulting from changes in other conditions which could not be adequately predicted. While the appellants have limited discretion in changing work methods, they must adapt to changes in external conditions, such as weather, which impact on flight training activities and directly affect the appellants' workload. The intent of Degree C is met and this degree is creditable.

At Degree D, the work is very demanding from a technical standpoint and requires: (1) considerable knowledge of work methods, techniques, procedures, and equipment; and (2) application of seasoned judgment and practical skills of a relatively high order. In most instances, work methods involve complicated routines or sequences, elaborate equipment or instrumentation, exacting data collection requirements, or heavy public service schedules. Degree D differs from Degree C in the more demanding requirements for job-oriented skills and knowledges and the greater use of judgment brought about by the increased complexity of the problems and the work methods, equipment, and techniques used by the technician. Technicians at Degree D apply meteorological knowledge and judgment in determining how local conditions and reports and observations from various sources affect the weather forecasts, the extent of change, and whether to take action to protect life and property.

Degree D is not met. While the appellants' work bears some similarity to that described at Degree D, in that it involves data collection and heavy volumes of work, there are several significant differences. Unlike Degree D, the judgments exercised by the appellants involve the application of established regulations, standards, and procedures to specific situations to which those guidelines are directly applicable. The data collection responsibilities of the appellants involve the collection of flight plan information on prescribed forms and in prescribed formats which are completed by pilots and reviewed by the appellants for completeness and accuracy. Judgments by

the appellants as to the accuracy of flight plan information are based on their personal knowledge of FAA and Army requirements and the structure of established airways in the vicinity of the installation. Decisions made by the appellants are based on established guidelines rather than the personal assessment of the appellants. This involves a significantly more circumscribed exercise of judgment than is described at Degree D, with less room for subjectivity on the part of the appellants than is intended by Degree D. This degree describes the exercise of judgment based on significant technical knowledge to determine how new information changes what is currently accepted and what actions should be taken on the basis of those judgments. In contrast, the appellants are concerned with making judgments about how the information presented to them (e.g., in the form of flight plans) complies with established regulations and procedures, and what changes are needed to bring the information into compliance. Consequently, the intent of Degree D is not met, and is not creditable.

This factor is evaluated at Degree C.

Summary

Factor	Evaluation
I. Level of Responsibility	Level II
II. Complexity	Degree C

The combination of Level II for Factor I and Degree C for Factor II equates to GS-7, using the Grade-Determination chart on page 22 of the GS-1341 standard.

Decision

These positions are properly classified as Air Traffic Assistant, GS-2154-7. This decision constitutes a classification certificate issued under the authority of section 5112(b) of title 5, United States Code. This certificate is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the Government.