

120 Howard Street, Room 760
San Francisco, CA 94105



**Classification Appeal Decision
Under Section 5112 of Title 5, U.S. Code**

Appellant:	[the appellants]
Position:	Air Traffic Control Specialist (Terminal) GS-2152-11
Organization:	[activity] [Naval Air Station] U.S. Department of the Navy [city, state]
Decision:	Air Traffic Control Specialist (Terminal) GS-2152-11
OPM Decision Number:	C-2152-11-01

Signed by Denis J. Whitebook

DENIS J. WHITEBOOK
CLASSIFICATION APPEALS OFFICER

March 28, 1997

DATE

As provided in section 511.612 of title 5, Code of Federal Regulations, this decision is mandatory and binding on all administrative, certifying, payroll, disbursing, and accounting officials of the government. The agency is responsible for reviewing its classification decisions for identical, similar, or related positions to ensure consistency with this decision. There is no right of further appeal. This decision is subject to discretionary review only under conditions and time limits specified in the Introduction to the Position Classification Standards, appendix 4, section G (address provided in appendix 4, section H).

Decision sent to:

[CCs]

Introduction

On October 8, 1996, the San Francisco Oversight Division of the U.S. Office of Personnel Management received a position classification appeal from [the appellants] through their representative. The appellants work in [a large DOD installation]. They believe that their Air Traffic Control Specialist (Terminal) GS-2152-11 positions should be classified at the GS-12 level. This appeal is accepted and decided under 5 U.S. Code 5112.

General issues

By law, we are required to make our classification decision solely by comparing the positions' current duties and responsibilities to OPM standards and guidelines (5 U.S. Code 5106, 5107, and 5112). In reaching our decision, we have carefully considered all of the relevant information furnished by the appellants, their representative, and the agency.

Position information

[the DOD installation] is a unit of the Control Tower Branch. The Control Tower Branch controls Visual Flight Rules (VFR) traffic within the airport traffic area. It provides control instructions to arriving and departing aircraft, controls Instrument Flight Rules (IFR) traffic released by the local approach control facility, relays air traffic control clearances to departing IFR traffic, provides flight following service to local flights, and alerts crash/rescue facilities, as required.

The appellants' official position description #FC180, states that the primary duties involve separating, sequencing, spacing, and issuing clearances and instructions to aircraft operating within the [activity's] area of responsibility. Duties are divided between the ground control approach room and control tower.

The [the activity] consists of five helipads and two parallel runways subdivided into five smaller landing areas. It is used solely as a training facility providing experienced and student helicopter pilots an opportunity to familiarize themselves with the helicopters and to practice touch-and-go landings on the runways and helipads using various types of helicopters. No more than ten helicopters are allowed in the flight pattern at any time. Aircraft beyond that number are turned away from the flight pattern. No midair maneuvers, evasions, or other types of operations are allowed. No true landings are made unless an aircraft is in distress. All pilots are expected to maintain a speed of approximately 90 knots per hour, regardless of a helicopter's performance capabilities. Ninety percent of the operations are conducted under Visual Flight Rules (VFR) and 10 percent under Instrument Flight Rules (IFR). The helicopters are stationed at nearby [naval air station]. A radar air traffic control facility located at [the DOD installation] provides radar approach control for Imperial Beach.

[The activity] has two control positions, but normally functions as a single-control position tower. Rarely is more than one controller required to direct traffic. Except for clearing a pilot to and departing from a helipad, tower control over the helicopter pad operations is limited to preventive control only. Under preventive control, the appellants issue advice or instructions only if a situation

such as a traffic conflict develops which requires corrective action. The appellants control the situation until it is resolved, then return control to the pilots. Approval of pilot action for repetitious, routine operations is eliminated. The appellants do not deal with fixed-wing aircraft. The facility operates fifteen hours daily, Monday through Friday. Rotating shift work is required.

The position description and other information furnished by the appellants and the agency provide additional details about the appellants' duties and responsibilities and how they are carried out.

Series, title, and standard

The duties and responsibilities described above are covered by the Air Traffic Control Series, GS-2152, and neither the agency nor the appellants disagree. Like the appellants' positions, jobs classified in this series are concerned with the control of air traffic to insure the safe, orderly and expeditious movements along air routes and at airports requiring a knowledge of aircraft separation standards and control techniques, and the ability to apply them properly, often under great stress. The appellants' positions are concerned with issuing air traffic control instructions to aircraft flying within a designated area around an airport; therefore, the positions are titled Air Traffic Control Specialist (Terminal) as specified in the titling instructions on page 8 of the GS-2152 standard.

Part II of the standard for the Air Traffic Control Series, GS-2152 is used to evaluate the duties required to control air traffic in terminals.

The appellants serve as radar, tower, and watch supervisors; however, the appellants do not exercise the level of supervision (e.g., assign and review work, recommend performance standards and ratings, approve leave, interview candidates, counsel employees) necessary to evaluate the work by reference to the General Schedule Supervisory Guide.

Grade evaluation

Part II of the standard for the Air Traffic Control Series, GS-2152, contains two classification factors to differentiate between work at various grade levels: (1) Knowledges, skills and abilities required of the controllers, and (2) Complexity of the control environment. The first factor is directly related to the type of control services provided by the terminal, and the various procedures and techniques which the controller must know and apply. The second factor addresses the demands placed on the controller by the density and congestion of aircraft. The grade level descriptions, particularly at the GS-10 level and above, reflect that density affects the first factor as well as the second factor. In their appeal, the appellants question how their agency measured traffic density. The agency finds there is an average of 74 operations per hour and the appellants believe that there is an average of 99.9 operations per hour. Since traffic density significantly influences the grade level of controller positions, we will discuss this issue first.

Guidance for measuring traffic density can be found on pages 39-42 of the GS-2152 standard. OPM does not usually question the methodology an agency uses to measure aspects of the work performed (such as air traffic density). This point is made on page 40:

It is not the intent of this standard to specifically identify each of these flight operations which may be included in the above definitions and which would be measured to determine the average hourly operation. The determination that a particular aircraft operation or maneuver meets the general definition of an aircraft or instrument operation is left to agency management.

In measuring operations for non-approach control terminals, such as the appellants' terminal, only the aircraft (airport) operations should be used according to guidance on page 40 of the GS-2152 standard. An aircraft (airport) operation is an arrival at or departure from an airport with air traffic control service. These operations include an aircraft take-off or landing, low approach below traffic pattern altitudes, stop-and-go, and touch-and-go operations. To sum up the agency's interpretation, they counted only the arrival and departure of an aircraft. They excluded from the aircraft (airport) operations count the touch-and-go operations because the appellants exercise only preventive control during touch-and-go operations. In preventive control, the controllers do not approve repetitious, routine pilot action. The controllers intervene only when they observe a traffic conflict developing. The pilots maintain their own separation and sequencing with runway traffic, other helipad aircraft, and inbounds during touch-and-go operations (10 of the 12 operations performed by each pilot in each training session). We note that the underlying premise in the standard is that the controller is issuing instructions to the aircraft. As the density of traffic increases significantly, there is increased pressure for more rapid, precise, and clipped transmission between controller and pilot. Since the appellants are not in contact with the aircraft during touch-and-go operations, the agency's decision to exclude the touch-and-go operations appears reasonable. We will use the 74 operations per hour to evaluate the appellants' positions; however, to address their concerns, we also evaluated their positions using 99.9 operations per hour.

The duties of the appellants' positions are discussed below and compared to the two classification factors and the appropriate grade level criteria. The grade level criteria address nonradar terminals and radar terminals. The appellants' terminal meets the definition for the non-approach control terminal on pages 30-31, a nonradar terminal.

Knowledges, skills, and abilities required

The skills, abilities, and judgments required of controllers at GS-10, GS-11, and GS-12 are significantly influenced by the greater density of traffic operations which must be handled on a regular basis. The GS-2152 standard characterizes GS-10 traffic demands at non-approach control terminals during the day and evening shifts as typically handling an average of up to 34 aircraft operations per hour. At the GS-11 level, aircraft operations at non-approach control terminals during day and

evening shifts typically average from 35 to 89 operations per hour. At the GS-12 level, non-approach control terminals handle 90 or more aircraft operations hourly during day and evening shift periods.

- GS-10 is the first level of independent performance of all control functions in non-approach and nonradar approach control terminals. As a regular duty the GS-10 performs, under general supervision the duties of all positions of operation in the terminal issuing control instructions to aircraft operating under visual or instrument flight rules or combinations of both. Control work in the terminals is divided into positions of operation which are responsible for such specialized control operations in tower cabs as: the control of aircraft in the air and on the runways, control of aircraft on the taxiways, or obtaining and communicating flight clearances to pilots.
- The skills, abilities, and judgments required of the GS-11 controller are significantly influenced by the greater density of traffic which must be handled on a regular basis. Compared to the GS-10 controller, the GS-11 must issue very exact and very precise instructions in more heavily congested control situations within more restrictive time allowances. More often than the GS-10 controller, the GS-11 must make decisions as whether to land or circle arriving traffic and whether intervals between aircraft should be shortened or lengthened to assure adequate separation and the efficient movement of traffic. The increased traffic density imposes greater difficulty in sequencing and spacing aircraft, and greater complexity in determining the proper movements and course instructions, often accompanied by the need to amend instructions to numerous aircraft to avoid disrupting the traffic pattern. At this level more precise and frequent coordination with the pilots and other controllers is typically required than at the next lower level.
- As noted on pages 48-50, the GS-12 level is characterized by exceptionally difficult and complex nonradar work situations in the non-approach control and nonradar approach control terminals. The GS-12 level is distinguished from the GS-11 by the significantly higher level of skills, abilities, and judgments required in regularly, and for sustained periods, handling an extremely heavy density of traffic. In the GS-12 nonradar terminal environment this much higher level of skills is required because of:
 - Continuous or near continuous communications between pilots and controller for extended periods;
 - Rapid and precise coordination of control actions among controllers and with air traffic facilities;
 - Increased number of aircraft positions, directions and speeds which must be assimilated and mentally updated with the rapid changes occurring in the traffic pattern;
 - Requirements for split second analysis of the traffic situation, and rapid and precise decision making; and

- Frequent to constant use of all known procedures to expedite traffic.

The requirement for controlling an extremely heavy density of traffic for sustained periods results in the GS-12 controller facing a constantly changing pattern of traffic which presents more difficult sequencing and separation problems than the GS-11. In this situation a control instruction to one aircraft nearly always requires amending instructions to several aircraft to maintain adequate separation and expedite the flow of traffic. The GS-12 nonradar controller in this situation must consider many more alternatives than the GS-11, i.e., the more numerous effects which might result from a single control decision in the extremely congested GS-12 control environment require a more considered and faster analysis than is required at GS-11.

The skills, abilities, and judgments required of controllers at the GS-10 and GS-11 levels are essentially the same, but GS-11 controllers are significantly influenced by the greater density of traffic operations which must be handled on a regular basis. The appellants' performance requirements are substantially higher than at the GS-10 level. Instead of handling an average of up to 34 aircraft operations per hour as described at the GS-10 level, the appellants handle 74 operations per hour. Seventy-four operations per hour falls into the GS-11 level, i.e., 35 to 89 operations per hour.

The appellants believe that the average traffic density for their positions is 99.9 operations per hour, including the touch-and-go operations. In terms of just numbers, this would meet the GS-12 level where the terminals handle 90 or more aircraft operations hourly. However, the difference between the GS-11 and GS-12 levels is more than just numbers. At the GS-12 level there is continuous or near continuous communications between pilots and controllers for extended periods; rapid and precise coordination of control actions among controllers and with air traffic facilities; increased number of aircraft positions, directions and speeds; etc. The record reflects that during touch-and-go operations, communications with the pilots is by exception rather than continuous, the pilots are responsible for sequencing and separating themselves, and the helicopters are operated at no more than 90 knots per hour regardless of performance characteristics. The appellants' positions do not require the higher level skills, abilities, and judgement described at the GS-12 level.

The appellants also provide on-the-job training to military and civilian air traffic controller trainees, as necessary, to meet established local qualification standards. The paramount knowledges and skills needed to perform the training work are the air traffic specialist knowledges, skills, and abilities. We have found the air traffic specialist knowledges, skills, and abilities to be properly evaluated at the GS-11 level. There is no provision to add a grade level to positions that instruct lower graded trainees above the level needed to actually perform the work.

The first factor is evaluated at the GS-11 level, whether the average operations per hour are 74 or 99.9.

Complexity of the control environment

- At the GS-10 level, traffic demands on the terminal are such that the controllers may perform at the same time more than one function or position of operation (e.g., the ground control and flight data position) for many of the shift hours. Controller/pilot contacts occur at a moderate pace, generally allowing adequate time to relay instructions and coordinate control actions with other aircraft. Control of either visual or flight rules traffic is complicated by such factors as a mix of aircraft with different operating speeds and characteristics; various combinations of student and experienced pilots; unfavorable terrain; etc. The GS-2152 standard characterizes GS-10 traffic demands at non-approach control terminals during the day and evening shifts as typically handling an average of up to 34 aircraft operations per hour.
- At the GS-11 level, traffic demands are such that the full range of positions of operation (local control, ground control, approach control, clearance delivery and flight data) are manned on a full or substantially full-time basis during day and evening shift hours. This is in contrast to the GS-10 level where traffic density is such that positions of operation are frequently combined for several hours during these shifts. Complicating environment and operational factors similar to GS-10 are present in the GS-11 control environment. However, difficulties imposed by, for example, a mix of student and experienced pilots are intensified by the heavy density of traffic typical at this level. At the GS-11 level, aircraft operations at non-approach control terminals during day and evening shifts typically average from 35 to 89 operations per hour.
- Traffic demands at the GS-12 level are such that at non-approach control terminals, the local control function may be divided along the configuration of the airport into two or more positions of operation requiring complex intra-terminal procedures and coordination of control actions. The extremely dense and congested traffic patterns result in few if any extended lulls in operations, and peak traffic hours tend to overlap. The difficulties imposed by combinations of such factors as noise abatement procedures, mixtures of experienced and student pilots, high level of pilot training, natural terrain obstructions, and mixtures of aircraft with widely varying speeds are substantially intensified by the sustained period of extremely heavy traffic characteristic of nonradar work. At the GS-12 level, non-approach control terminals handle 90 or more aircraft operations hourly during day and evening shift periods.

Comparable to the GS-10 level, the record reflects that the appellants perform more than one position of operation at the same time for many hours of the shift. When the performance requirements for full performance level control positions in non-approach control terminals are substantially higher than at the GS-10 level, the position is evaluated at the GS-11 level. The appellants handle a high level of helicopter pilot training, with predominantly student pilots, in traffic that meets the GS-11 level for density and congestion. Since the performance requirements are substantially higher than at the GS-10 level, the control environment is evaluated at the GS-11 level.

The control environment does not exhibit the numerous complicating factors found at the GS-12 level. The record reflects that natural terrain obstructions in the flight path are hills 1½ miles to the south and 3-4 miles to the east that do not present a significant impact to complexity. The OLFIB is a helicopter training facility; however, the pilots sequence and separate themselves during touch-and-go operations (10 out of 12 operations performed by each pilot during a training session). In addition, the pilots maintain a speed of 90 knots regardless of the helicopters performance characteristics. The record reflects that there are frequent lulls in operation. The complexity of the control environment does not reach the GS-12 level. Even if the aircraft operations per hour met the GS-12 level, the record does not reflect that there are a combination of factors that would meet the difficulties described at the GS-12 level.

The appellants also provide on-the-job training to military and civilian air traffic controller trainees, as necessary, to meet established local qualification standards. The appellants are imparting their knowledge and experience of the OLFIB's control environment to the trainees. We have found the control environment to be properly evaluated at the GS-11 level. There is no provision to add a grade level to positions that instruct lower graded trainees above the level needed to actually perform the work.

The second factor is evaluated at the GS-11 level, whether the average operations per hour are 74 or 99.9.

Grade determination

Both factors are evaluated at the GS-11 level; therefore, the final grade is GS-11.

Decision

The appellants' positions are properly classified Air Traffic Control Specialists (Terminal) GS-2152-11.