

Department of Defense (DoD)
Civilian Personnel Management Service (CPMS)
Field Advisory Services - *FAS*
Classification Appeal Decision

DoD Decision:	Telecommunications Equipment Operator, GS-0390-06
Initial classification:	Communications Assistant, GS-0301-06
Organization:	Army District Information Management Office Telecommunications Branch
Date:	April, 15, 1997

POSITION INFORMATION

The Department of Defense (DOD), Civilian Personnel Management Service received a classification appeal from an employee at the U.S. Army District Xxx. The appellant occupied a Communications Assistant, GS-301-06 position located at Yyy. Management reassigned the appellant to his present position in Zzz. When the appellant moved to this new position, he brought all of the duties from his previous location in downtown including communications security (COMSEC) and timekeeping. To these duties, management added Designated Agency Representative (DAR) duties for telephone communications matters, branch administrative assistant duties, and relief radio operator duties. However, they did not provide the appellant with a corrected position description (PD) until they certified his present PD. Subsequently, the servicing Civilian Personnel Office (CPO) officially classified this new position as Communications Assistant, GS-301-06, and reassigned appellant to it . Although the reassignment SF-50 indicated that the appellant concurred with the accuracy of the new PD, he questioned the GS-06 level classification. For over a year, he pursued informal District classification complaint processes to have the grade increased from GS-06 to GS-07. After failing to receive a GS-07 classification, the appellant submitted a formal classification appeal. Subsequently, the commander forwarded this appeal through the

servicing CPO to our office for adjudication. Although the appellant believed the classification of his position incorrect, he and his first level supervisor both certified that "the enclosed job description is accurate as of the date of the appeal."

Appellant appealed the classification of his position because he believed the servicing CPO improperly classified it at the GS-06 grade level. He stated in his appeal letter that "the complexity and difficulty involving analysis, interpretation, and decision making required as Communications Assistant to the Chief, Telecommunications Branch, ... is improperly classified at the assigned grade level and fully meets the requirements for the GS-301-07 level." The appellant also stated in the same letter that "in this age of downsizing when I am performing my duties in a large number of different classification series, and I am performing these at journeyman level, I feel I should be graded to reflect my additional amount of duties and responsibilities." In an information paper attached to the classification appeal letter, the appellant's first-level supervisor added: "when a single employee is required to perform in such a large number of different classifications, and is required to perform these duties at the journeyman level, then this employee's grading classification should be amended or raised to reflect this additional amount of responsibility." The first-level supervisor also stated in a separate memorandum attached to the appeal letter: "in my opinion and belief, when the above duties are scrutinized separately, the job is graded correctly; however, when the aggregate is studied, then it is my belief the job is undergraded."

Given the concern of the appellant and his supervisor regarding the impact of assuming a variety of additional duties and responsibilities in a position, we need to briefly explain the position classification process as it applies to the variety and volume of work assigned. A position description (PD) represents the official record of the major duties and responsibilities assigned to a position by a responsible management official (i.e. a person with authority to assign work to a position). A position represents the duties and responsibilities which make up the work performed by an employee. Under the provisions of title 5, U.S. Code, section 5102(a)(3), agency management determines what work will be assigned to a "position." Section 7106(a)(2)(B) also vests agency management with the authority to assign work to individual employees. It is an established classification principle that the classification of a position is based on the work assigned to the position and properly performed. The assumption of a variety of additional duties and responsibilities by a position is not necessarily sufficient to support an increase in the grade of a properly classified position, unless those additional duties are of significantly greater complexity and difficulty than those which supported the original classification of the position. In fact, the variety of work performed, the volume of work performed, and the quality of performance are matters dealt with properly under the performance management system. They are not germane to the classification process. We determine the classification of a position solely by comparing the work assigned to a position and performed by an employee with the appropriate OPM position

classification standard (PCS). Therefore, to determine the correct classification of this appealed position, we will evaluate the assigned duties and responsibilities by comparing each major work assignment (e.g., branch administrative assistant) with the criteria presented in the appropriate OPM PCS.

REFERENCES:

- a. OPM Introduction to the Position Classification Standards, page 23, August 1991.
- b. OPM, The Classifier's Handbook, Chapters 2, 4, and 5, August 1991.
- c. OPM PCS for the Telecommunications Processing Series, GS-390, November 1991.
- d. OPM PCS for the Telecommunications Series, GS-391, March 1990.
- e. OPM PCS for the Communications Clerical Series, GS-394, October 1963.
- f. OPM Grade Level Guide for Clerical and Assistance Work, June 1989

SERIES AND TITLE DETERMINATION

The servicing CPO placed the appellant's position in the Miscellaneous Administration and Program Series, GS-301, because the duties and responsibilities performed fell in two or more occupations in the GS-300, General Administrative, Clerical, and Office Services Group. The appellant stated in his appeal letter that, in his opinion, he performed duties allocable to the Telecommunications Series, GS-391, for which he received "no credit or points." The GS-301 series includes positions that perform, supervise, or manage nonprofessional, two-grade interval work for which no other series is appropriate. In contrast, the GS-391 occupational series includes positions that perform, manage, or supervise technical and analytical work pertaining to the planning, development, acquisition, testing, integration, installation, utilization, or modification of telecommunications systems, facilities, services and procedures. As we described above, the appellant now performs a variety of communications related work in support of the mission of the Telecommunications Branch. This work ranges from branch administrative assistant and DAR for all District telephone matters to operation of the district COMSEC control center and relief radio operator. Due to this variety of work, we must determine the occupational series of each specific work assignment in the following series evaluation.

As the branch administrative assistant, the appealed position accomplishes such day-to-day administrative functions as bill paying, correspondence, purchase requests, telephone service requests, timekeeping, and maintaining the district data base for frequency management. The Communications Clerical Occupational Series, GS-394, which includes clerical work performed in support of communications operations or in the maintenance of communications records covers this type work. As DAR for all district telephone matters, the appealed position transacts all district telephone business relating to equipment repair, new installations, and changes in service. These duties require constant contact with the General Services Administration along with regional and long distance telephone service providers. As stated in the certified PD of record, they also require a knowledge of standardized telecommunications equipment, services, and processes. The GS-394 series also covers this work because the appellant clearly performs it in support of district communications operations. This DAR work does not allocate to the GS-391 series because positions allocated to this series perform technical and analytical work concerned with the movement of information between locations. GS-391 work requires a technical knowledge of communications equipment, systems, services, and transmission media that includes: (1) an understanding of electronic communications concepts, principles, practices, procedures, policies, standards, and operational requirements; and (2) a technical knowledge of the operational and performance characteristics of communications equipment, automated control and network management systems, transmission media, and relationships among component parts of telecommunications systems. Since the appealed position only requires a knowledge of standardized telecommunications equipment, services, and procedures to accomplish the DAR duties, we find the GS-391 series not applicable.

The relief radio operator duties involve work covered by the Telecommunications Processing Series, GS-390, which includes performing or supervising work concerned with the operation of equipment used to transmit, receive, and relay messages. Operation of the District COMSEC control center also involves work clearly described on page 2 of the GS-390 PCS.

The variety of work described above involves a mix of duties and responsibilities covered by two or more occupational series and classified by more than one standard or guide. For most positions, the grade-controlling work normally determines the series (Reference b, Chapter 4). As described in the "Grade-Level Determination" below, the duties and responsibilities identified with the GS-390 occupational series allocate to the GS-06 grade level. Although these GS-390 duties do not constitute the majority of the work accomplished by this appealed position, they do constitute the highest level requirement for knowledge and experience. Therefore, we allocate this appealed position to the GS-390 occupational series. The GS-390 PCS (Reference c) designates the title "Telecommunications Equipment Operator" for positions allocated to the GS-390 series.

Consequently, we assign this title to the appealed position.

GRADE-LEVEL DETERMINATION

The Introduction to the Position Classification Standards, page 23 (Reference a), recognizes that some positions involve performing different kinds and levels of work which, when evaluated separately in terms of duties, responsibilities, and qualifications required, allocate at different grade levels. Usually, the highest level of work performed for a majority of time determines the final grade level. When, however, the highest level of work constitutes a smaller portion of the position, 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% of the employee's time; and
- The higher level knowledge and skills needed to perform the work would be required in recruiting for the position if it became vacant.

Our analysis of this appealed position must be guided by these established position classification principles. Consequently, in the following grade-level determination, we will evaluate each major work assignment with the appropriate OPM standard or guide to determine the proper grade for that work. We will then determine the grade level for the position as a whole.

At the request of his first level supervisor, the appellant kept a record of the time he spent on the various duties described in his official PD. This record encompassed a four and one half (4 and 1/2) month period. On the basis of this record, the supervisor submitted a memorandum to the servicing CPO on, to change the original percentages of time for each work assignment reflected on the PD. Acting on this memorandum, the servicing CPO made the pen and ink changes. Referencing these revised percentages, we found that the branch administrative duties constituted approximately 35% of the total work time of the appealed position and that the DAR duties constituted approximately 25% of total work time. In the above "Series Determination," portion of this evaluation, we found that the Communications Clerical Occupational Series, GS-394, covered both of these work assignments.

The GS-394 PCS does not contain grade-level criteria. Therefore, in accordance with guidance contained in Chapter 5 of The Classifier's Handbook (Reference b), we must select a PCS that covers work as similar as possible to the work being evaluated for cross series grade comparison. The branch administration and DAR work assignments constitute duties of a clerical and administrative support nature. Therefore, we will evaluate these duties by

application of the OPM Grade Level Guide (GLG) for Clerical and Assistance Work (Reference f).

Application of the Grade Level Guide for Clerical and Assistance Work

This guide provides a general description of the characteristics of each grade level from GS-01 through GS-07 in a three-part format:

- (1) the definition of the grade as spelled out in the law (5 U.S.C. 5104);
- (2) a description of grade level criteria pertaining to clerical and assistance work written in narrative format as expressed in two evaluation factors: *Nature of Assignment* which includes the elements of knowledge required and complexity of the work, and *Level of Responsibility* which includes the elements of supervisory controls, guidelines, and contacts; and,
- (3) general work examples to illustrate each grade level.

We determine the appropriate grade level by applying the total criteria (i.e. the law, the evaluation factors, and work examples) and assigning the highest level that matches the administrative assistant and District DAR work. We consider weaknesses as well as strengths in matching work to the grade-level criteria.

Nature of Assignment:

As the Telecommunications Branch administrative assistant, the appealed position accomplishes a variety of administrative functions including daily correspondence, paying utility bills, initiating purchasing and telephone service requests, maintaining payment suspense files, and maintaining the district data base for frequency management. These recurring clerical/administrative support duties consist of related processes but they differ in nature and sequence because of differences in the transactions. This work requires a knowledge of the administrative standards and procedures utilized by a multi-faceted branch that includes technical and operational arenas. It also requires a knowledge of the automation requirements used in the daily operation of branch business transactions.

As the District DAR for telephone matters, the appealed position receives notice of long distance or local telephone service problems. It analyzes the issues involved and provides the in-house or contract technicians the necessary information to permit fast, efficient repair with as little interruption of service as possible. The position also randomly checks phone service bills for misuse or abuse and maintains the status of emergency communications service. This

variety of assignments involves different and unrelated processes where the appellant must identify the issues or problems involved in the assignment and determine the steps necessary to accomplish them. The work requires a knowledge of the business practices of a variety of telephone service providers as well as a knowledge of standardized telecommunications equipment, services, and processes to resolve well-defined operational questions and conditions.

The complexity of the branch administrative support work and the knowledge required to accomplish it closely corresponds with the *Nature of Assignment* described at the GS-04 grade level in the GLG for Clerical and Assistance Work. At this level, as in the Branch administrative operations, the work consists of related steps, processes, or methods which require the employee to identify and recognize the differences among a variety of recurring situations and the actions taken differ in nature and sequence because of differences in the particular characteristics of each case or transaction. Also, as in the Branch administrative support assignment, the work at this level requires subject-matter knowledge of the organization's programs and business practices.

In contrast, the work associated with serving as the DAR for telephone matters best identifies with the *Nature of Assignment* described at the GS-05 level. At this level, work consists of a variety of assignments involving different and unrelated processes (e.g. identifying the telephone service problem, contacting the proper service technician to resolve it, and maintaining the status of emergency communications service). As in the appealed position, the employee at this level must identify and understand the issues involved in each assignment and determine the steps and procedures necessary to accomplish them. Also, as in the appealed position, the work at this level requires an extensive knowledge of the organization's rules, procedures, operations and business practices along with a knowledge of telecommunications equipment and services.

The branch administrative support duties and the duties associated with serving as the District DAR for telephone matters do not meet the GS-06 level as described in the GLG. At this level, work typically consists of processing a wide variety of transactions for more than one type of assigned activity or functional specialization. The work at this level involves a variety of assignments subject to different sets of rules, regulations, and procedures. A course of action taken on any issue has a substantive impact on the outcome of the assignment. The work also requires a comprehensive knowledge of rules, regulations, and other guidelines relating to completing the assignment in the program area assigned. An employee usually attains this level of knowledge through extensive, increasingly difficult, and practical experience and training in the subject matter field.

In the example of a GS-05 *Nature of Assignment* provided in the GLG, the GS-05

employee accomplishes a variety of standard and non-standard assignments in support of several Customs Inspectors. This employee in this example resolves a variety of nonrecurring problems requiring a knowledge of applicable Federal law as well as a knowledge of pertinent manuals and guides related to the branch functions. The work performed also requires a substantial knowledge of the functions of other divisions and branches within the Customs District. This work example best describes the level of assignments performed by the appellant. The work example at the GS-06 level does not apply to the appealed position because, unlike the Branch DAR work, the work accomplished at this level does not entail a wide variety of transactions for more than one type of assigned activity or functional specialization. Instead, the work applies to the district telecommunications function.

Level of Responsibility:

The Chief, Telecommunications Branch, provides guidance on overall policy as well as the general methods and procedures to use in accomplishing the administrative support and District DAR work. The Branch Chief also expects the appellant to exercise initiative and independent judgment in accomplishing these assigned duties and responsibilities and he states that he reviews the appellant's work in this area only for the adequacy of customer service provided. Guidance consists of Army regulations, manuals, technical bulletins, and operating procedures which cover most recurring work. However, the appellant must use judgment in adapting established procedures to solve unusual problems. The appellant also maintains regular personal contacts with the telecommunication customers of the branch, with ADP personnel responsible for the automated telecommunications hardware and software, with personnel at DOD switching and relay centers, with USA and DOD COMSEC personnel, and with local and long-distance telephone company personnel. These contacts usually deal with providing and obtaining information or with solving a wide variety of operating problems within the telecommunications arena.

The *Level of Responsibility* described above and exercised by the appealed position clearly exceeds the GS-04 level. At this level, the supervisor provides minimum assistance with recurring assignments, but unusual situations normally require assistance from the supervisor or a higher level employee. The supervisor at this level also normally reviews completed work more closely than at the GS-05 level. Procedures for accomplishing the work at the GS-04 level have been established and the employee uses specific guidelines; however, in some cases, the employee may make minor deviations without contacting the supervisor. Employees at this level also maintain contacts with co-workers and others outside the organization; however, the work situation limits these contacts to the exchange of information, or in some cases, to resolve a problem in connection with the immediate assignment.

The *Level of Responsibility* described above applies to both the DAR and Branch

administrative assistant assignments and it fully meets the *Level of Responsibility* described in the GLG at the GS-05 level. At this level, the supervisor defines objectives, priorities, and deadlines and expects the employee to accomplish the work in accordance with accepted practices and precedents. The supervisor then evaluates the work for technical soundness and effectiveness in meeting organizational goals. In addition, at the GS-05 level, as in the appealed position, extensive guides in the form of instructions, manuals, regulations, and precedents apply to the work. However, problems may arise which require interpretation and adaptation of the established guides. Contacts in the appealed position like contacts described at the GS-05 level extend to a variety of persons within and outside the agency for the purpose of receiving or providing information relating to the work or for the purpose of resolving operating problems in connection with normal recurring responsibilities.

Although clearly exceeding GS-04 level and appearing to exceed the GS-05 level in the area of supervisory control described below, the *Level of Responsibility* exercised by this appealed position does not fully meet the GS-06 level. At this level, the supervisor only reviews completed work for conformance with overall policy because most workers recognize the employee as an authority on processing transactions or completing assignments within a complicated framework of established procedures and guidelines, often when no clear precedents exist. Although the supervisor limits the review of the appellant's administrative support and DAR work to customer input, and other district workers certainly recognize the appellant as an authority in these two work areas, guidelines and precedents do exist for most transactions. In fact, at the GS-06 level, unlike the work situation for the assignments described above, the employee uses numerous and varied guidelines making it difficult to decide how to complete the various transactions required and, in many cases, guidelines do not apply requiring the employee to adapt the guidance to cover new and unusual work situations. At the GS-06 level, the employee also maintains contacts with employees throughout the agency and in other agencies to provide information, explain the application of regulations, or resolve problems relating to the assignment. We did not find this level of personal contacts in the two work assignments described above.

In the example of GS-05 work provided in the GLG, the supervisor assigns the employee's work by defining objectives, priorities, and deadlines. The employee independently plans and carries out successive steps of the work according to the specific requirements of each case. The supervisor then evaluates the work for appropriateness and effectiveness. Specific guidelines cover agency processing procedures; however, the employee uses judgment in discovering problems for referral to higher level workers or the supervisor. The employee maintains regular contacts with co-workers and the public to exchange information and resolve problems in meeting requirements. The *Level of Responsibility* described in this example closely corresponds with the responsibility exercised by the appellant. The *Level of Responsibility* characterized in the GS-06 work example does not apply because it involves

responsibility for a stream of products or continuing processes in work situations that occur in a broad administrative program or function such as the budget program for the entire district.

Work at the GS-05 level as described in the law (5 U.S.C. 5104) includes those positions which perform, under general supervision, difficult and responsible work in office, business, or fiscal administration. It requires considerable training and supervisory or other experience; a broad working knowledge of a special subject matter or of office, laboratory, engineering, scientific, or other procedure and practice; and the exercise of independent judgment in a limited field. We find this description of duties and responsibilities in the law consistent with the duties and responsibilities described in the certified PD for the DAR work assignment and consistent with the responsibility for the Branch administrative assistant assignment.

We evaluated the *Nature of Assignment* for the Branch administrative duties at GS-04 and the District DAR duties at GS-05. We evaluated the *Level of Responsibility* for the administrative duties at GS-05 and the DAR duties as meeting the GS-05 level and exceeding it in one area. Therefore, the strength in the *Level of Responsibility* balances the weakness in the *Nature of Assignment* meaning that the final grade level for these two work assignments equates to GS-05. We also found this determination consistent with the law and the grade-level examples provided in the GLG.

Application of the Telecommunications Processing Series, GS-390

The revised percentages submitted by the appellant's supervisor indicated that the COMSEC work constituted approximately 15% of the position's total work time and the remaining relief radio operator duties about 25% of the work time. The Introduction to the Position Classification Standards (Reference a) defines a significant work assignment as one that occupies at least 25% of an employee's time. In addition, the appellant verified in a telephone interview that he performed radio operator duties on a regular basis because the District utilized only one other operator. Therefore, we must consider these duties as a regular assignment and classify them accordingly. In the "Series Determination" portion of this evaluation, we found that the GS-390 occupational series covered these two work assignments. Consequently, we will use the grading criteria in the GS-390 PCS to determine the grade level of these assignments.

The GS-390 PCS uses the Factor Evaluation System (FES) format to determine grade levels. Under the FES system, we place work assignments in grades on the basis of the duties and responsibilities assigned and the qualifications required as evaluated in terms of nine factors. We then assign a point value to each factor based on a comparison of the assignment's duties with the factor-level descriptions in the standard. The factor point values mark the lower end of the ranges for the indicated factor levels. For an assignment factor to

warrant a given point value, it must be fully equivalent to the overall intent of the selected factor-level description. If the assignment fails in any significant aspect to meet a particular factor-level description in the standard, we must assign the point value for the next lower factor, unless we balance the deficiency by an equally important aspect which meets a higher level. To arrive at the final grade level, we convert the total points assigned to a grade by use of the grade-conversion table in the applicable standard (Reference b, Chapter 2).

Although the COMSEC and radio operator duties constitute separate work assignments, they both allocate to the GS-390 series. Therefore, for this evaluation, we will combine the assignments and explain the differences as we apply the nine FES factors. The application and evaluation of the nine factors appear below.

Factor 1. Knowledge Required by the Position

This factor measures the nature and extent of the knowledge needed to accomplish the work and the nature and extent of the skills needed to apply this knowledge. To be used as a basis for selecting a level under this factor, a knowledge must be required and applied.

As the District COMSEC custodian, the appealed position maintains the responsibility for requisition, receipt, storage, accountability, and destruction of all District COMSEC materials. It also processes a moderate volume of classified and unclassified message traffic for the district and prepares mobilization and emergency plans for the evacuation and destruction of classified COMSEC materials. These duties and responsibilities require a knowledge of COMSEC regulations and policies as well as a knowledge of the specialized equipment and procedures associated with the operation of a computerized cryptographic message system.

As a radio operator, the position uses High-band FM repeater, Lo-band FM, and high frequency single sideband radio systems to transmit, receive, and relay a variety of multi-purpose messages. It assembles, corrects and routes incoming and outgoing messages via the radio spectrum in a timely and professional manner to facilitate the work processes of the District's customers. It also adjusts priorities, establishes alternative routes, and intercepts messages to prevent system overload. These duties require a knowledge of the computerized system for sending, receiving, and/or relaying messages including a knowledge of multiple combinations of commands to restore the system if operations fail.

The Level of Knowledge required to accomplish the duties and responsibilities described above meets Level 1-3 as described in the GS-390 PCS. At this level, the work requires a knowledge of message processing and other related duties including the knowledge of a large body of standardized security regulations and procedures. At this level, the work also

requires the skill to examine, correct, and transmit messages through a computerized telecommunications system, and to deliver incoming messages to the proper destinations. The Level of Knowledge required does not reach Level 1-4 because we could not find sufficient evidence that the COMSEC and radio operator duties required a knowledge of an extensive body of telecommunications and computer operating procedures to isolate and solve a wide range of recurring problems that affected the operation of the COMSEC or message centers.

On the basis of this rationale, we assign Level 1-3 which equates to 350 points.

Factor 2. Supervisory Controls:

This factor covers the nature and extent of direct or indirect controls exercised by the supervisor, the employee's responsibility for completing the work, and the review of completed work.

We found in our review of this appealed position that the branch supervisor provides general guidance on operational policy covering the COMSEC and radio operator work and that he provides assistance only on new projects or unusual problems. The incumbent of the position then exercises initiative and independent judgment in accomplishing the work including restoring message system operations when outages not requiring mechanical or circuit repair occur. The supervisor indicated in a telephone interview that due to the experience of the appellant, he reviewed the COMSEC and radio operations work only for the adequacy of customer service provided.

This level of supervisory control meets and exceeds Level 2-2 where the supervisor provides general instructions concerning established practices and policies, and provides instructions on special circumstances or changes in priorities. Employees at Level 2-2 work independently within established procedures, but consult with the supervisor when normal approaches do not solve problems. The supervisor at this level spot checks the work for quality and checks logs for quantity of messages processed.

On the basis of information obtained from the official PD and from telephone interviews with the appellant and the branch supervisor, we find that the level of supervisory control exercised over the two work assignments described above reaches Level 2-3. At this level, the supervisor provides general instructions to cover anticipated problems and assists the employee only with high priority, unusually complex problems (e.g., system outages that do not respond to standard combinations of computer commands). Employees at Level 2-3 identify problems, make decisions under pressure to restore system operations, and take corrective actions. The supervisor at this level normally reviews completed work only for the adequacy of system operations.

On the basis of the above factor-level rationale, we assign Level 2-3 for Factor 2 which equates to 275 points.

Factor 3, Guidelines:

This factor covers the nature of guidelines used, and the judgment needed to apply them.

The official PD of record indicates that available guidelines for the appealed position include a variety of Army regulations, manuals, guidelines, and technical bulletins that cover most recurring work. However, they do not apply completely to all problems and provide only general guidance for situations not previously encountered. In addition, the incumbent of this appealed position must use judgment in adapting or deviating from operating manuals and established procedures when solving unusual problems such as conflicting error messages or program deficiencies.

The nature of guidelines and the judgment needed to apply them that we described above meet and exceed Level 2-2 where employees use established procedures and manuals for the operation of the telecommunications system. Although numerous, the guidelines at this level provide specific information on how to solve common problems. Employees at this level must choose the appropriate guide for the specific operating situation; however, unlike the appellant, they refer unusual problems not covered specifically in the guidelines to the supervisor.

The nature of the guidelines and the judgment needed to apply them for both the GS-390 assignments fully reach Level 3-3, the highest level described in the GS-390 PCS. At this level, operators use established manuals, guidelines, and procedures that cover recurring work. However, the available guidelines do not cover unusual problems and they provide only general guidance for situations not previously encountered. At Level 3-3, as in the appealed position, employees must use judgment in adapting or deviating from operating manuals and established procedures and in finding related precedents to solve unusual operating problems.

On the basis of this rationale, we find that the nature of the guidelines and especially the judgment needed to apply them meet Level 3-3 which equates to 275 points.

Factor 4, Complexity:

This factor covers the nature, number, variety, and intricacy of tasks, steps, processes, or methods in the work performed; the difficulty in identifying what needs to be done; and the difficulty and originality involved in performing the work.

When operating the COMSEC facility the appealed position operates a computerized cryptographic system dedicated to sending and receiving a moderate volume of classified and unclassified message traffic for the Memphis District. As the COMSEC custodian, the position maintains the responsibility for the operation and maintenance of all assigned equipment and circuits. If necessary, the position troubleshoots and coordinates the correction of conditions affecting equipment and circuit operation. This includes solving equipment and circuit problems that require the use of diagnostic test programs to isolate the causes of problems. In these cases, the incumbent of the appealed position must choose a course of action and adapt it, as necessary, to the specific operating problem.

The appealed position must also transmit, receive, and relay a variety of messages using High-band FM repeater, Lo-band FM, and high frequency single sideband radio

systems. These systems utilize an electronic computer switched matrix to initiate multiplexed signal paths to allow any District office to communicate with their floating plant or land based personnel. The position also utilizes a separate computerized message system to connect to the. The position must identify any operational problems with these communications systems and use judgment to determine whether to correct the problem using a variety of diagnostic test programs or to contact contractor technicians and/or electrical engineers.

The level of complexity for these work assignments meets and exceeds Level 4-2 where, as in the appealed position, the employee operates a computer system dedicated to telecommunications in a telecommunications center. At Level 4-2, the employee examines, corrects, transmits, and relays messages of various precedence and security levels using related sets of procedures. The difficulty in identifying what needs to be done at this level involves correcting hardware or software problems that respond to standard alternative approaches and decisions depend on such things as destinations and priority levels of messages, security levels, and system or program capabilities.

The level of complexity described above for these assignments does not fully meet Level 4-3, the highest level described in the GS-390 PCS. At this level, unlike the position in question, the employee operates a computer system dedicated to relaying messages and the work involves solving operating problems that do not respond to standard computer console command combinations and procedures. The appellant, like employees at Level 4-3, does use diagnostic test programs to isolate the cause of operating problems choosing a course of action likely to succeed from among several alternatives. However, we did not find evidence that the decisions required by the COMSEC and radio operator work assignments included those normally associated with operating telecommunications relay centers described at Level 4-3. Level 4-3 assignments include assessing conflicting problem indicators; considering alternative routes or equipment configurations; and adjusting the equipment for message load,

precedence, and security levels.

On the basis of this rationale, we find that the complexity of the work associated with the GS-390 work assignments exceeds Level 4-2, but does not fully meet Level 4-3. Therefore, we must follow the OPM guidance contained in Chapter 2, Reference b, and assign Level 4-2, the point value for the next lower factor level at which the position fully meets all criteria for that level. Factor Level 4-2 equates to 75 points.

Factor 5, Scope and Effect:

This factor covers the relationship between the nature of the work, as measured by the purpose, breadth, and depth of the assignment, and the effect of work products or services both within and outside the organization.

The purpose of the work identified in the two assignments discussed above involves operating the COMSEC center and the district radio systems to keep all message traffic flowing between District offices and higher headquarters, between the District Offices and personnel located in other districts, and between the District offices and personnel located on floating and land based sites throughout the district. The work affects the accurate and reliable transmission of messages between the areas described above.

The level of Scope and Effect identified above best equates to Level 5-2. At this level, the purpose of the work relates to operating a computerized telecommunications system to send or receive messages in accordance with established procedures. The work at this level affects the accurate and reliable transmission of national defense, medical or other important messages. The Scope of these work assignments exceed Level 5-2 and appear to meet Level 5-3 where the purpose of the work involves keeping message traffic flowing to a worldwide system (the DOD COMSEC system covers transmission sites worldwide). However, the work performed by the appealed position does not meet the Effect described at Level 5-3 where the work affects the flow of message traffic worldwide and can affect the timely delivery of a large volume of national defense, medical, or other vital information to and from several large telecommunications centers.

On the basis of this rationale, we find that the Scope of the work meets and exceeds Level 5-2. However, the Effect of the work does not meet Level 5-3. Therefore, as in Factor 4 above, we assign the next lower factor level at which the position fully meets all criteria for that level. This means we assign Factor Level 5-2 which equates to 75 points.

Factor 6, Personal Contacts and Factor 7, Purpose of Contacts:

Factor 6 includes face-to-face contacts, telephone contacts, and other dialogue with persons not in the supervisory chain. Factor 7 includes the reason or purpose for these contacts. The contacts that serve as the basis for the level selected for Factor 7 must be the same as the personal contacts selected for Factor 6.

Persons Contacted:

The appealed position maintains regular contact with users of the branch's telecommunications systems; repair personnel, including engineers and systems programmers; personnel at other telecommunications and switching centers; and Agency COMSEC personnel responsible for secure keying materials.

This level of contacts best compares with Level 2 where contacts are with users of the telecommunications system, with programmers, and with employees in other telecommunications centers and switching centers. At this level, as in the appealed position, some of the contacts occur regularly and others only as problems occur, such as failure of messages to go through the system.

Purpose of Contacts:

The appealed position makes the personal contacts described under Level 2 above to provide and obtain information necessary to complete message transactions. In addition, it also works with other employees in connected telecommunications centers to solve mutual message problems and with engineers and programmers to solve hardware and software problems that interrupt message traffic. The purpose of these contacts exceed Level *a* and best equate with the purpose of contacts described at Level *b*, the highest level described in the GS-390 PCS.

The combination of Levels 2 and *b* equates to 75 points using the table provided on page 12 of the GS-390 PCS. Therefore, we assign 75 points for Factors 6 and 7.

Factor 8, Physical Demands:

This factor measures the requirements and physical demands placed on the employee in performing work assignments, including the agility and dexterity required and the extent of physical exertion.

According to the official PD, the appealed position primarily accomplishes sedentary work which involves some standing and walking. An incumbent may occasionally have to lift heavy items, such as boxes weighing about thirty pounds, when performing minor maintenance on

peripheral telecommunications equipment. This level of physical demands equates with Level 8-1, the only level described in the GS-390 PCS.

Therefore, we credit Level 8-1 for this factor which equates to 5 points.

Factor 9, Work Environment:

This factor considers the risks and discomforts in the employee's physical surroundings and the safety precautions required.

According to the official PD, the appealed position accomplishes work in a well-lighted and temperature controlled environment. A fairly high noise level exists, but management takes normal safety precautions. The level of risks and discomforts encountered by an incumbent of this position equates to Level 9-1, the only level described in the GS-390 PCS. Therefore, we credit Level 9-1 for this factor which equates to 5 points.

Summary of Factors

Factor Level Points

1. Knowledge Required by the Position 1-3, 350
2. Supervisory Controls 2-3, 275
3. Guidelines 3-3, 275
4. Complexity 4-2, 75
5. Scope and Effect 5-2, 75
6. Personal Contacts and
. Purpose of Contacts 2-b, 75
8. Physical Demands 8-1, 5
9. Work Environment 9-1, 5

TOTAL 1135

Grade Determination:

Using the Grade Conversion Table found on page 4 of the GS-390 PCS, we find that the total points assigned for the COMSEC and radio operator work assignments, 1135, fall within the GS-06 point range of 1105 to 1350.

GRADE-LEVEL CONCLUSION

The appellant of this appealed position spends 60 percent or the majority of his work time on administrative support duties that equate to the GS-05 grade level. In addition, he spends 40 percent of his work time on telecommunications equipment operation duties that equate to the GS-06 grade level. Although the higher level duties occupy less than a majority of the appellant's work time, we find them grade controlling because (1) they are assigned to the position on a regular and recurring basis; (2) they occupy at least 25% of the position's work time, and (3) the knowledge and skills required to perform them would be required in recruiting for the position if it became vacant (Reference a, page 23). Therefore, on the basis of this determination, we find this appealed position properly graded at the GS-06 level.

APPEAL DECISION

We find the proper classification for this position is Telecommunications Equipment Operator, GS-390-06.