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**No. AIBSNLEA/CHQ/CMD/2021**

**Dated: 06.07.2021**

To,

**Shri P.K. Purwar**  
The CMD BSNL  
New Delhi-110001

**Sub: Comments on Manpower Norms for finalization of Sanctioned strength in BSNL post VRS.**

Ref: 1) Letter No. BSNLCO-RSTG/15(14)/1/2020-RSTG dated 28/06/2021  
2) Letter No. No: 4-02/2014- Restg Vol. V (pt.) dated 27/08/2020.  
3) Letter No. No. AIBSNLEA/CHQ/CMD/2021 dated: 12/02/2021  
4) Letter No. No. AIBSNLEA/CHQ/CMD/2021 dated: 19/02/2021

**Respected Sir,**

We would like to draw your kind attention on the above cited subject and Restructuring Cell Letter cited at Ref No.1&2. In continuation of our earlier Letters cited at Ref No.3&4, **we wish to make it clear that the draft proposals for BSNL Man Power Norms, circulated vide the above cited Ref No.1, are Arbitrary, unjustified and uncalled for.**

The proposal is advocating Top Bureaucratic Structure but it may be recalled that Top Bureaucracy was one of the important causes of French Revolution. The Posts abolished by virtue of VRS only may be taken into consideration for reduction of Posts. We cannot accept any reduction in the Posts in Promotional Cadre keeping the Sanctioned Strength unchanged in the Promotional Cadre may make the Career progression to all the Executives.

It is certainly going to hamper the working of BSNL and the motivation of the Employees. Details of shortcomings, Our Comments/Suggestions and change of stand taken by the Restructuring Cell are detailed below:

(A) **SHORTCOMINGS :**

1) Prima facie, we believe that the said proposal has been issued with no clear motive and it suffers from lack of equity, transparency and application of mind. It seems that the number of Posts is worked out in a closed mind, i.e on the basis of working strength only and that too on different footings. We had given several suggestions in the past to BSNL Management to utilize its own Executives for the Revival of BSNL by empowering them and

reducing the dependency on officers on Deputation. Naturally we expected that during the Restg process, focus will be for empowering the Officers and Executives of BSNL, having sufficient experience. However, the BA concept is formed with GM/PGM level Officers heading it, whereas the number of absorbed GM/PGM level officers available in BSNL is very few. The deputation of the ITS Officers will end in March, 2023, on diminishing basis.. The working strength of CGM/GM equivalent is shown as 571 (415 ITS + 166 Absorbed Officers) whereas the real strength of SAG (ITS)Officer should be 199 during 2021-22 as per the Repatriation Order issued by DoT dated 11.3.2013 on year to year diminishing basis .On a calculated move, BSNL Management borrowed many ITS officers from DOT from time to time on temporary basis to fill up the white collar Posts in the grade of SAG/HAG in violation of the MOU for curtailing the posts of ITS Deputation year by year. Whether this Restg exercise by reducing the Promotional avenues of BSNL Executives and increasing the GM/PGM level Posts and keeping it vacant is going to help the Revival of BSNL? Even at present many GM level Posts are lying vacant in SSA/BAs whereas so many ITS Officers in the GM level are posted in the Circle Head Quarters, Metro Cities and BSNL Corporate Office.

- 2) Secondly, if all the posts manned by ITS on Deputation for a specific period i.e., up to 10 years ( become Zero during 2022-23)are to be worked out as Working Strength of that Cadre, we wonder what prevented Management to consider the posts of SDE/AGM/DGM equivalent. Manned by look after Executives. In that case, the working strength in the grade of SDE/AGM/DGM equivalent etc., would have been much more, say nearly the Sanctioned Strength. **Therefore the anomaly needs to be rectified either by reducing the SAG/HAG strength or by increasing the Posts of SDE/AGM/DGM equivalent.**
- 3) Thirdly, the total Manpower has been shown clubbing all the equivalent cadres with no break up of Streams. This has been done perhaps to hide the partisan view of the Management and we are of the opinion that the Management is not transparent to declare/share the Cadre/Stream/ Discipline wise working strength and proposed Man Power with the Stake Holders. **So the need of the hour is Management has to declare/share the details of each Cadre with the Stake Holders for the transparent/Open minded discussion regarding the justification of each Post/Cadre.**
- 4) **It appears to us that the Manpower Norms prepared by the Restg Cell is vitiated by cronyism and Forum shopping to further the career interest of the Creamy layer at the cost of that of the Bottom layer.**
- 5) **It is very surprising to note that the Restg Cell is drastically reduced the Posts of JTOs, JAOs and AOs as against the working strength. What is the hidden Agenda of the Management for the reduction of the Working strength of the Cadres? It is an arbitrary and unjustified decision.**
- 6) Lateral entry in Group B (JTO) posts are drastically reduced which is not helpful for operational activity. JTO is the Feeder cadre of the Telecom Wing

and Main Promotion cadre from JEs. **The present working strength of JTO(T) is 14,536 but it has been reduced to 11,283. This will impact on the field activities and later on BSNL Services**

- 7) Reduction in Entry level Posts will result in increase of Contract /Tendering Work. It will damage the BSNL goodwill in the Market and our workforce will depends on Contractors.
- 8) JAO is the Feeder cadre of the Finance Wing and Main Promotion cadre of Clerical/Sr. Accountant Cadres. **The present working strength of JAO is 2,351 but it has been reduced to 1,890.**
- 9) **The present working strength of AO is 1,961 but it has been reduced to 1,547.**
- 10) **The drastic reduction of JAO and AO Posts will result in delay in closing of Annual/Half-Yearly/Quarterly Accounts, delay in submission of various Financial Statements, Outstanding Persuasion, Billing and Customer related Complaints, Statutory requirements and the assurance of Revenue.**
- 11) Now, for the span off control, considering SDE/JTOs and AO/JAOs as equivalent cadres, which is not justified and this will be reverse of Pyramid Structure and such Organization will fail in long run as no Promotional Avenues will be available.

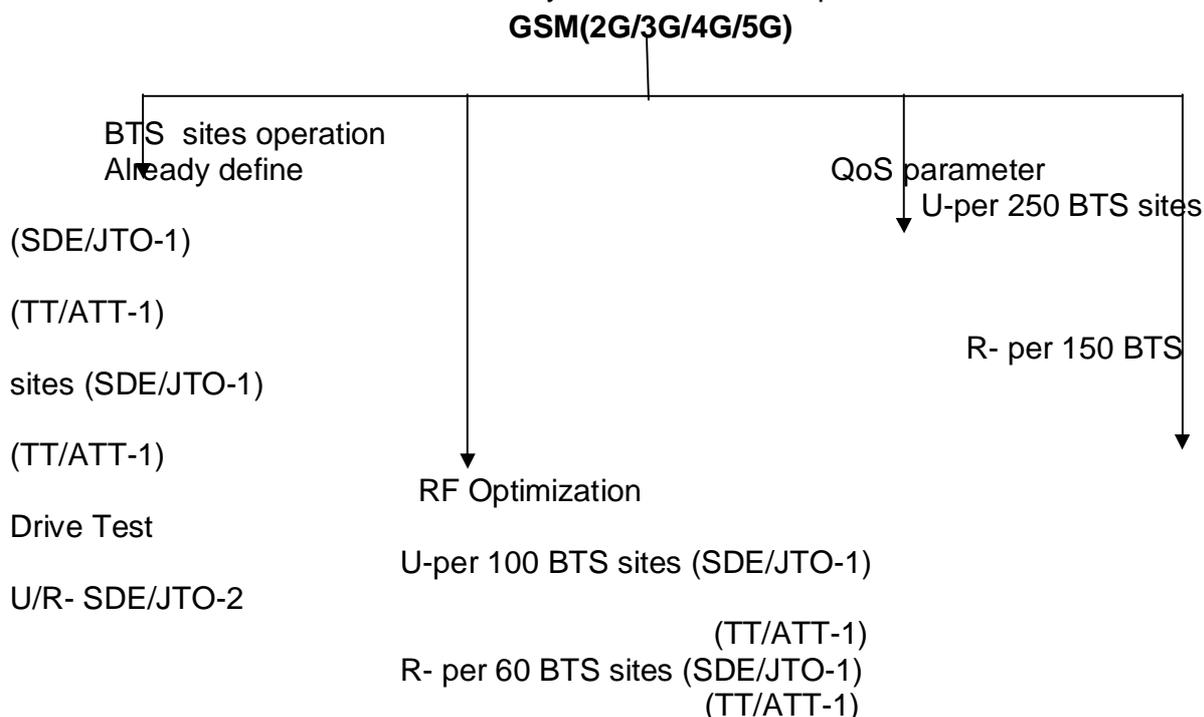
### **Our Comments/Suggestions:**

#### **(B)TELECOM ENG WING:**

- 1) Our Elite Customers are belongs to Enterprise Business. At Circle level we have defined the Customer relation Manager but at BA level, it is not defined.
- 2) Strength of CCNO and PSG Teams at BA level for both CFA & CM monitoring are not incorporated in the Staffing Norms.
- 3) At present Fiber Cable connection demand rises day by day. Our FTTH Model is based on TIP/Vendors. This should be controlled by our staff. So TIP/Vendor Management Norms will be required for monitoring.
- 4) In case of Leased lines/MPLS-VPN Circuits, no provisions of staff are given in this Staffing Norm.
- 5) 500 BTSs per AGM is humanly impossible in the Regions like Assam, Uttarakhand, NEs etc and it should be looked into.
- 6) **a) In Category-2(Large BA- 24 Numbers having Revenue Rs.125 -250 Cr) the present working strength of the SDE/JTOs is drastically reduced in the proposal of Restg. Cell.**  
**For Example:** In Jaipur-BA, The working strength of SDE &JTOs is 233 whereas 176 SDE/JTOs only shown as proposed sanctioned strength in the Flow Chart. **Hence it is suggested that the Norms to be revisited and reviewed and sufficient number of SDE/JTOs has to be provisioned in the Category-2 Large BAs i.e not less than working strength so as to maintain the Services.**

**b)** It is observed that only one AGM (Tx/NWO) has been provisioned. Since huge Transmission Network is maintained by the SSA/BA than the Mtce. Region, **it is suggested that two more AGM (Tx/NWO) Posts has to be provisioned in the Category-2 Medium BAs.**

- 7) **Category -3(Medium BA-66 Numbers having revenue >50 Cr &<125 Cr):-**  
It is observed that one AGM(Tx/NOW) provisioned for Category -3(Medium BA having revenue >50 Cr &<125 Cr.) Since huge Transmission Network is maintained by the SSA than the Mtce. Region, **it is suggested that one more AGM (Tx/NWO) Post has to be provisioned in the Category-3 Medium BAs.**
- 8) **Category -4 (Small Business Area-64 Nos. having revenue<50 Crs):-**  
Earlier 3 DGMs were working in the SSAs/BAs, but as per the above cited Restructuring Organizational Chart, only two DGMs are provisioned and also no DGM (HR &Admin) is provisioned and no AGM (Tx/NWO) Post is provisioned in Category -4 (Small Business Area having revenue <50 Cr.) **Hence it is suggested that one DGM (HR&Admin) Post is to be provisioned in each Category-4 Small BA. Since huge Transmission Network is maintained by the SSA than the Mtce. Region, one AGM (Tx/NWO) Post is to be provisioned for each Category-4 Small BA.**
- 9) Creation of separate Posts for HR/Admn, Marketing and Legal Executives. It may be appreciated that the present chaos in HR, Marketing and Legal affairs in our Company is basically due to lack of Professionals in the respective Area. So it is of paramount importance that restructuring of the entire work force of such a large Company without qualified and experienced HR/Marketing/Legal may not meet the expectations of the Company. It is therefore demanded to create separate Posts with Specialization as MBA (HR/Fin/Mktg), LLB etc for these cadres both from Internal and External candidates.
- 10) Wireless Segment is growing field. We have only defined operation norms of BTS Maintenance. This may be divided in four parts like:-



**(C)TELECOM FINANCE WING:**

- i) a) **BA Category 1 & 2-** BAs Category 1 and 2 are having several 'Area Operation offices' but it is observed that No AO/JAO has been provisioned in these Area OP Offices whereas so many activities like TR Pursuit cell, monitoring of Outstanding of Revenue, Billing related complaints, Customer interface & other Revenue/Billing related activities are to be managed from Op Area office which are situated normally at Revenue District HQ. At least two posts for One AO & One JAO is to be created for the Area Op headed by GM/DGM/AGM under the overall control of PGMTD, the Head of BA.  
**Hence 38 AOs/JAOs posts (19 each for Cat 1&2 BAs) may be additionally created for Op Area Offices under Category 1 & 2 BAs.**

b) **In the category -2, Large BA,** the present working strength of the AOs/JAOs is drastically reduced in the proposal of Restg. Cell.

**For Example: (1)** In JAIPUR BA - The working strength of AOs & JAOs is 41 whereas 14 AOs/JAOs only shown as proposed sanctioned strength in the Flow Chart.

**(2)** In Madurai BA - The working strength of AOs & JAOs is 30 whereas 14 AOs/JAOs only shown as proposed sanctioned strength in the Flow Chart.

**Hence it is suggested that the Norms to be revisited and reviewed and sufficient number of AO/JAOs has to be provisioned in the Category-2 Large BAs i.e not less than working strength.**

- ii) **CN (TX) North, South, East, West & NE Regions (5 in numbers):-** These 5 Regional offices are working as independent Circle Office (Non-Territorial) and almost all the activities of Territorial Circle is to be done in these Non-Territorial Circles. **CN (TX-North) Delhi Circle is very important Circle where around Rs.800 to Rs.1000 Cr Annual billing for Leased Line Circuits is being done for which complete independent TR Cell is required to be placed as per the present System but surprisingly only One CAO and 3 AO/JAOs have been provisioned each for these Circles.** These Circles are dealing with several activities like: Taxation, TR Billing, Pursuit cell, Outstanding recovery, Corporate Accounting, Audit, Budget/Banking & Finance, Central Settlement Cell, Claims, HR wing, Vig wing etc. and for which the posts for sufficient Accounts Personnel should be created in these Circles also.

**Hence if we treat these Circles equal to Cat-2 BA, at least Two DGM (F), Four CAOs and 15 AOs/JAOs should be proposed for posting for each of these Circles. Accordingly there is a shortage of 10 (2x5) DGM (F), 15 (3x5) CAOs and 60 (12x5) AOs/JAOs in these Circles headed by CGMs, several GMs/Sr.GMs and GM (Fin) are also required to be provisioned.**

- iii) **Mobile Billing Zones (4 in numbers):-** It is observed that Nodal Centre Billing Zones situated at Chandigarh, Trichy, Kolkata & Pune have been

totally neglected and No Accounts Personnel have been provisioned for these 4 Billing Zones whereas all important Billing and Revenue related activities, several types of reports on daily, fortnightly, monthly or quarterly basis are required and regular interaction with related Circles as well as Corporate Office is required to reply of several types of queries from these offices is to be completed in a time bound manner for which sufficient Accounts Manpower is required to be posted for these 4 offices situated at different places.

**So keeping in view the present procedure and work load, if we take Cat-2 BA staffing norms, at least Two DGM (F), 4 CAOs and 14 AOs/JAOs posts should be additionally created for each of these offices. Hence there is a shortage of 8 DGM (F), 16 CAOs and 56 AOs/JAOs for these offices.**

- iv) **A&N Circle based on BA concept:-** A&N circle is presently working as full fledged Circle and now also the CGMT along with 2 GMs & more than 6 DGMs have been proposed to be posted in A&N Circle/BA but in Accounts side only One DGM (F) and 3 CAOs along with 9 AOs/JAOs have been proposed. No AO/JAO has been proposed for GM Area office. If we put A&N Circle equal to Cat-2 BA, then 2 DGM (F), 4 CAOs and 14 AOs/JAOs should be proposed.

**Hence there is a shortage of One DGM(F), One CAO and 5 AOs/JAOs is there in A&N Circle.**

- v) **Circle Offices (total 26 in numbers including CHTD & KoITD):-** In Cat-1, 2 & 3 Circles, Chennai and Kolkata Metro Districts, the Posts of DGM(F), CAOs and AOs have been drastically reduced without any justification whereas the work has been increased in manifold, such as Quarterly closing of Accounts along with Half-yearly and Yearly closing since BSNL as a Company has listed in Stock Market, timely disposal of various Statutory requirements, following New Accounting Standards etc., along with existing work even before VRS, hence it may be considered that in Cat-1 Circles: 5 DGM(F), 8 CAOs and 64 AOs Posts, in Cat-2 Circles: 4 DGM(F), 7 CAOs and 56 AOs and in Cat-3 Circles: 2 DGM(F), 6 CAOs and 42 AOs Posts may be created.

**Accordingly 24 (1x24) DGM(F) Posts, 96 (4x24) CAO Posts and 788 (36x5+32x19) AOs posts for the 24 Circles may be additionally provided as per the above justification.**

**Similarly,** for Chennai and Kolkata Metro Districts same activities are to be conducted as in other Circles, hence for these two Metro Districts also similar provision as for Cat-2 Circles i.e. 4 DGM(F), 7 CAOs and 56 AOs should be made for smooth functioning of these Circle offices. Further CHTD is having 9 Area GM Offices and Kolkata TD having 8 Area GM Offices for which no AO/JAO posts have been provided. So, 3 posts of AOs per Area GM should be given. **Hence, 4 (2x2) DGM(F) Posts, 8 (4x2) CAO Posts and 119 (34x2+3x17(9+8)) AO Posts may be additionally provided to these two Metro Districts.**

**Further**, no Post of CAO & AO/JAO is created for EB vertical and for Vig wing in any Circle including CHTD & KoITD whereas GM (EB), 3 DGMs-I/II/III – EB, DGM (Vig) etc. have been provisioned in all Circles. So, to have a smooth functioning of the vertical wings in the Circle Offices and as per present procedure also, at least **One CAO-EB, 2 AO/JAOs- EB and One CAO (Vig) and 2 AO/JAO (Vig) posts have to be created in all 26 Circle Offices hence there is a shortage of 52 CAOs and 104 AO/JAOs in all these circles may be taken in to account for consideration.**

- vi) **Corporate Office:** In corporate Office also total strength of DGM(F)/CAO/AGM has shown combined as 18 No. and AO/JAO as 90 No. Presently after VRS, around 106 AO/JAOs are working in BSNL CO, New Delhi and several AO/JAOs are having double & triple charge after VRS. It seems that the Man-Power (positions) working in allied Verticals i.e. Estt., Pers(SEA), PAT, Vig, Pension, MM, IT, NB, BW, Legal, Elect, Civil/Arch. Sections etc. have not been taken in to account and the provision for these wings has not been made. **Hence it is bring to the kind notice and suggested that One AO/JAO each for MM, IT, NB, BW, Legal, Elect, Civil/Arch. Sections and 2 for Vig, 2 for Estt., 2 in Pension, 1 PAT, 6 for Pers. Should be provisioned in CO New Delhi office. Accordingly there is a shortage of 20 AO/JAOs is there in CO BSNL.** Further in the flow chart the GM (Fin) have been shown as 7 in numbers but in total strength only 6 have been counted. Accordingly DGM(F), CAO/AGM(F) have shown as 18 taken together, which should be increased as 7 No of DGM(F) and 21 No. of CAO/AGM(F). **Hence there is a shortage of 1 DGM (F) and 9 CAOs/AGM(F) in CO BSNL.**

#### **(D) CIVIL/ELECTRICAL/ARCHITECH WING:**

- 1) It is surprising to note that the same RESTRUCTURING Cell vide letter no. 4-02/2014-Restg Vol.V(Pt.) dtd 27.08.2020 has ordered for consolidation of the BAs and rationalized work and delegated powers is now diluting many issues. How can the same office make diametrically opposite recommendations within a short span of time?
- 2) For example, earlier order dated 27.08.2020 has stipulated one AGM(C) and one AGM(E) in all BAs of Category I,II & III, numbering total 88 AGM(C)s and same number of AGM(E)s in BAs. The present proposal has also justified one AGM(C) and one AGM(E) in the BAs of category I,II & III but restricting the number to 77 and 56 respectively for C/E Streams. The responsibility of choosing the BAs where AGM(C/E) would be posted is vested with the CGM(BW/EW). When complete integration of C/E/Arch wing in respect of all HR functions stand integrated with the Pers section since 2003 and orders from time to time, this kind of arrangement will only kill the time and motivation of the Executives. So we demand that calculation of AGM(C/E) posts in category I,II & III as 77 and 56 may be construed as a mistake and the correct numbers of 95 ( 5+24+66) may be adopted for AGM(C/E) please.
- 3) Similarly the number of posts in the grade of DGM(SE) (C/E) are worked out to be 19 and 17 respectively for Category I&II, whereas the number of BAs under

category I&II are 29 (5+24). So we demand that calculation of DGM(C/E) posts in category I&II as 19 and 17 may be construed as a mistake and the correct numbers of 29 ( 5+24) may be adopted for DGM(C/E) please.

- 4) In Category I (Very Large) Circles, GM(C), DGM(C)and SDE(C) only have been considered skipping the very important Post of AGM(C/E). So we demand that AGM(C/E) Posts may be created in these Very large Circles.
- 5) The BSNL Management is stressing more and more on Land Monetization and procuring External work through BTCL. But no provisions are kept in this regard. So we demand that one DGM(C) with one AGM(C) and one AGM (E) with two SDE(C/E) may be created in all Large & Medium Circles. So there will be 17 DGM(C) as Nodal officer for BTCL, 17 AGM(C) 17 AGM(E) and 34 SDE(C/E) for BTCL works.
- 6) Against the strength 56 numbers of Posts in ALTTC, Ghaziabad, no C/E Executives are provisioned. For training needs of C/E/Arch at ALTTC (as there are no scope in zonal trg centers) one DGM(BS-C) with one AGM from C/E/Arch & SDE(C/E/Arch) should be posted at Ghaziabad. Apart from training needs one field EE(C), two SDE(C/E) should also be created for maintenance of the huge Assets of ALTTC and Asset Management.
- 7) It was perceived that the Post of CGM(Arch) was abolished and all the subordinate officers were merged with respective Circles . But the Post of CGM(Arch) was again resurfaced in th present proposal. We place it on record that one CGM should be vertical Head of BW, EW & Arch. Wing. With the matching savings of two CGM Posts, field officers in the grade of SDFE/AGM(C/E) should be created.
- 8) We also place our demand on record that SDE/AGM/DGM(C/E/Arch) should also be considered for posting in non core Areas like Vigilance, Mktg, EB, HR etc., for meeting the legitimate aspirations of C/E cadre Executives as they are the most sufferers in this Restructuring drive.

#### **(E) TELECOM FACTORY/CSS/CSSS:**

##### **Man Power details in respect of Telecom Factories**

Sr. No.	Post	Pre VRS Sanctioned Strength	Post VRS Sanctioned Strength	Actual Strength as on 1.7.2021	Provisioned as per Res.Cell	Strength reqd. as per existing Work Load
1	DGM	14	12	0	6	13
2	AGM	26	13	5	6	25
3	SDE/JTO	247	215	40	30	56

**Suggestions regarding Factory wise required strength as per the existing Work Load,**

Post	CO	TF Kolkata				TF Jabalpur			TF Mumbai	TOTAL
		BSNL CO New Delhi	TF Kolkata GM Office	TF Alipore Kolkata	TF Gopalpur Kolkata	TF Khargpur Kolkata	TF Wright Town Jabalpur	TF Richa (JBP)	TF Bhilla (JBP)	
GM	1	1	0	0	0	1	0	0	1	4
DGM	1	0	3	1	0	3	1	1	3	13
AGM	1	1	6	2	0	6	1	2	6	25
SDE/JTO	2	2	12	6	0	12	2	6	14	56
Total	5	4	21	9	0	22	4	9	24	98
Unit wise Total	5	34				35			24	98

**Man Power details for CSS (Corporate Secretariat Service)**

Post	Pre VRS Sanctioned Strength	Post VRS Sanctioned Strength	Provisioned as per Restg.Cell	Strength required as per Same Analogy applied by Restg.Cell for DGM
AGM	24	16	12	24
DM(SO)	53	31	44	40
AM(ASO)	160	134		20

In view of the foregoing facts, we would request your good self to kindly consider our suggestions as per the above justification and cause to issue necessary instructions to the Officers concerned for provisioning of DGM/AGM/SDE/JTO equivalent Posts in all the Streams as per the details mentioned above to maintain the Network, the Financial discipline, Concurrences & Control very efficiently as well as the Standard Norms/ Procedures & Practices in the better interest of the Company.

With kind regards,

Yours Sincerely



**(S.Sivakumar)**  
**General Secretary**

**Copy for information and necessary action to:-**

1. Shri Arvind Vadnerkar, Director (HR) BSNL Board, New Delhi- 110001.
2. Ms Yojana Das, Director (Finance) BSNL Board, New Delhi- 110001
3. Shri Vivek Banzal, Director(CFA), BSNL Board, New Delhi-110001
4. Shri S.K.Mishra, Director(CM), BSNL Board, New Delhi-110001
5. Shri V. Ramesh, Director(EB), BSNL Board, New Delhi-110001
6. Shri R.K. Goyal, PGM (Pers.) BSNL CO, New Delhi- 110001.
7. Shri. Rajiv Kumar, GM (EF & FC) BSNL CO, New Delhi- 110001
8. Shri. Saurabh Tyagi, Sr.GM(Estt.) BSNL CO, New Delhi- 110001
9. Ms. Anita Johri, Sr.GM (SR) BSNL CO, New Delhi- 110001.
10. Smt. Samita Luthra, GM(Rectt.) BSNL CO, New Delhi- 110001
11. Shri Manish Kumar, GM (Restructuring), BSNL CO, New Delhi- 110001