राष्ट्र हित विभाग हित अधिकारी हित
All India Graduate Engineers & Telecom Officers Association
Central Headquarter, New Delhi
(The Recognised Association of BSNL)
(Affiliated to BMS)
Regn. no. HR/019/2018/02138

President
G Veerabhadra Rao
9440648648

General Secretary
Ravi Shil Verma
8373967633

Finance Secretary
Yogendra Jharwal
9414000877

All communication at E-mail - "chqaigetoa@gmail.com" only

No. AIGETOA/CHQ/2026-27/48 **Dated: 14.08.2026**

To,

Shri A Robert J Ravi Ji,
Chairman and Managing Director,
Bharat Sanchar Nigam Limited (BSNL),
Janpath, New Delhi - 110001.

Subject: The accountability model, KPI re-anchoring and Standard Operating Procedure for BTS Fault Management issued under OM No. BSNLCO-CMQS/22/1/2023-NWO CM II dated 24.07.2026 — request for withdrawal in the present form and provision of enabling BTS infrastructure update before any punitive KPI linkage — reg.

Reference: (i) OM No. BSNLCO-CMQS/22/1/2023-NWO CM II dated 24.07.2026 on Tower/BTS availability >98%, elimination of faults pending beyond 3 days and the Appendix on the BTS Tagging Tracker; (ii) SOP for BTS Fault Management circulated under the same number and date.

Respected Sir,

At the outset, AIGETOA places on record its unqualified commitment to the improvement of network availability and customer experience in BSNL. The executives whom we represent have delivered 4G saturation, BharatNet and 4G rollouts project under acute manpower shortage, delayed material supply and severe resource constraints. Our submission therefore are not against the objective of the referenced OM, but **to a scheme of accountability that fixes individual, scored and career-affecting consequence upon officers for outcomes governed by infrastructure, sanction and funding decisions that lie entirely outside their control.**

The referenced OM and SOP have been issued without any consultation with this Association, although they directly alter the performance appraisal, IPMS marks, posting entitlements and service conditions of executives. We request for the consideration of the following inputs and modification of the issued OM accordingly:

1. The primary mitigation prescribed by the SOP does not exist at the majority of sites.

Section 5 of the SOP mandates that where a physical repair legitimately exceeds the SLA, service must first be held or restored by battery plus DG, protection-ring diversion, or standby MW/UBR. At a very large proportion of our BTS sites there is no protection ring, no standby microwave or UBR, and no alternate media path of any description. The instrument on which the entire reconciliation rule depends is simply not available to the field officer. An officer should not be scored on the exercise of a lever that was never provided to him.

2. The SOP concedes the structural gap in its own text and then converts it into individual liability.

Section 5 itself records that single-fed sites with no diversion path are common on rural and DBN networks, classifies them as P1/P2, and states that they need standby backhaul or on-site spares. No CAPEX sanction, procurement schedule, material allotment or completion timeline accompanies that finding. An admitted infrastructure prerequisite, left unfunded, should not become the basis of a scored KPI carrying IPMS and posting consequences.

3. The restoration SLAs are arithmetically impossible on unprotected routes.

Section 9 of the SOP permits OTDR localization at T0+120 minutes and splicing/restoration at T0+300 minutes for urban and T0+420 minutes for rural OFC breaks — that is five to seven hours by the SOP's own reckoning. The P1 restoration SLA is two hours urban and four hours rural. Where there is no ring to divert traffic on to, the SOP's own permitted repair timeline breaches the SOP's own SLA before the officer has committed any lapse whatsoever. A procedure internally inconsistent to this degree should not be the measure of an officer's performance.

4. Battery hold-up at a large number of sites is shorter than the SOP's own first power milestone.

Section 8 correctly observes that on a mains-fail alarm the clock that matters is the battery hold-up time. It then permits DG start at T0+120 minutes and arrangement of a mobile DG at T0+3 hours urban and T0+5 hours rural. Where the battery bank is time-expired, partially failed, or under-sized against the present site load — the condition of a very substantial number of our sites — actual hold-up is well under two hours. The site is already down before the SOP's own step becomes due. The officer is then charged with downtime that the asset, not the officer, caused.

5. No baseline of power-backup adequacy or battery health has been established before scoring commenced.

Neither the OM nor the SOP captures, for any site, the installed ampere-hour capacity against the required capacity, the age of the bank, the date of last replacement, the rectifier module sufficiency, or the DG health and fuel-supply arrangement. Field experience further shows that many engine alternators deployed at sites have already exceeded their intended service life, with a substantial number approaching or crossing 20 years of operation. Automation systems are being installed on such ageing engines, while genuine spares for several legacy engine models are either unavailable or extremely difficult to procure. Curtailing engine usage and expecting sites to operate predominantly on battery backup cannot substitute dependable DG operation during prolonged mains failures. Battery availability also cannot be inferred merely from an indent appearing as pending or available in the Oorja system; a material entry in the portal does not necessarily mean that the required battery bank has actually reached and been commissioned at the site. Accordingly, the 14.4-hour monthly downtime budget of Objective O-1 rests on an untested assumption of asset fitness and material availability.

6. Cooling infrastructure and site environmental conditions have not been factored into the availability model.

A similar infrastructure gap exists in air-conditioning facilities. In a number of sites, cooling arrangements have been reduced or withdrawn based on theoretical assessments without adequate consideration of actual field conditions. In one field section alone, four B-Node stations are operating without any cooling facility, including free cooling. Such conditions

directly affect equipment reliability, thermal performance and service continuity, yet the field executive remains accountable for the resulting network impact.

7. Newly procured power plants lack a defined post-warranty maintenance framework.

After expiry of the one-year warranty period of newly procured power plants, there is no clear and uniformly structured mechanism for preventive and corrective maintenance at the field level. This creates uncertainty regarding the long-term reliability of critical power assets. A KPI framework should not assume assured power-plant availability unless a funded and accountable post-warranty maintenance arrangement is simultaneously established.

8. ERPS-based resilience is not yet consistently available in actual network operation.

The ERPS systems introduced to improve operational efficiency and resilience are still evolving and are only partially effective in field conditions. When a site goes down, traffic is expected to switch automatically to an alternate path; however, such switching does not always occur and field personnel are often required to undertake manual rerouting. Where the intended automatic protection mechanism is not consistently functional, the resulting restoration delay should not fairly be treated as an individual executive failure.

9. Digital Microwave maintenance remains dependent on delayed vendor response.

DMW links, including equipment supplied by Ceragon and HFCL, continue to present significant maintenance challenges. During fault conditions, timely vendor support and fault rectification are often inadequate, and obtaining vendor assistance can itself become a major part of the outage duration. Delayed OEM/vendor response directly affects network availability, while the accountable field executive has limited or no control over vendor mobilization, spares or technical support.

10. The newly deployed 4G BTS (CEF) network has intermittent faults and monitoring inconsistencies.

Many newly deployed 4G BTS sites experience intermittent short-duration outages whose causes are not readily identifiable. There are also inconsistencies between monitoring platforms: certain faults are visible in the CNMC portal linked with IPMS but do not appear in the OMC Web portal, which is the primary platform followed by field teams. Such discrepancy's complicate fault diagnosis, create uncertainty regarding the actual start and end of an outage, and can delay restoration. A scoring mechanism based on portal-generated data must first ensure that the monitoring systems are synchronised, technically validated and capable of providing a reliable single source of truth.

11. Field accountability must be matched with the actual infrastructure and support available at site.

Taken together, ageing power equipment, inadequate or delayed battery replacement, insufficient cooling, absence of assured post-warranty maintenance, incomplete automation, vendor-response delays, and inconsistent monitoring demonstrate that network availability is not solely a function of field-level effort. SDEs and JTOs remain committed to maintaining service availability, but sustainable performance can be achieved only when adequate infrastructure, timely material supply, responsive vendor assistance, functional automation and realistic operational planning are placed alongside the accountability framework.

12. The relaxation clause omits the two largest actual causes of sub-98% availability.

The OM relaxes accountability for prolonged EB failure, denial of site access or right-of-way, land and landlord disputes, law-and-order or natural-calamity conditions, non-availability of OEM spares, and an unrepairable OFC cable. It is conspicuously silent on the absence of

media ring protection and on inadequate or time-expired battery and power-plant capacity — which are, on the ground, the dominant contributors to the very shortfall the OM seeks to correct. This omission is the central defect of the accountability model and must be rectified.

13. The absolute 72-hour cap "under any circumstances" should not bind where the remedy is capital creation.

Objective O-2 and Section 5 of the SOP impose an absolute cap of three days on any outage under any circumstances. Where restoration is contingent upon construction of a ring, laying of a new OFC route, sanction of an EB feeder, or supply of a replacement battery bank or power plant, closure within 72 hours is not within the authority of the named pair, the AGM, the DGM or even the GM. A cap framed in absolute terms, with no carve-out for structural dependency, is incapable of compliance and will operate only as a mechanism of punishment.

14. Identical joint KPIs transfer pure infrastructure risk on to individual executives.

Under the OM the Tower Owner and the Route Owner carry identical scored KPIs — 34 plus 6 marks for CM-NWO executives and 20 plus 6 marks for Transmission executives — for availability that is determined in the main by whether a ring and an adequate power plant were ever sanctioned and provided at that site. Executives at JTO and SDE level neither design, sanction, procure nor fund these assets. Attaching IPMS consequence to them on this basis offends the settled principle that accountability must be commensurate with authority and with the resources placed at the officer's disposal.

15. A single unprotected fault produces multiple simultaneous breaches, which the scoring treats as independent lapses.

Pair load is capped at 25 to 50 towers. On an unringed route, one OFC break can bring down a large share of that entire span at the same instant, generating several breaches of the three-day cap from a single external event. The portal scoring, as described in para 5 of the OM, counts these as separate failures of the officer. Correlated failures arising from one structural cause must be recognized as one event, not as a multiplied indictment of the officer.

16. The Q2 uplift is not calibrated to the infrastructure baseline and is unattainable in the weakest circles.

Annexure-A1 applies a uniform per-circle uplift of 51.6 percentage points on each circle's own DBN baseline. This requires Sikkim to move from 0.0%, NE-I from 7.0%, Odisha from 8.0%, Jharkhand from 10.5% and Madhya Pradesh from 12.1% within a single quarter. These are precisely the circles with the least ring coverage, the oldest battery banks and the weakest EB availability. A uniform uplift presumes the deficit is managerial when it is demonstrably structural, and sets targets that are certain to be missed irrespective of officer effort.

17. The usage KPI holds executives answerable for demand, coverage economics and competitive market conditions.

Objective O-3 and Annexure-B fix a minimum of 100 latching users per tower and place 40 marks against it for the Marketing chain. Latching users at a given site are a function of population density, in-building coverage, spectrum and capacity provisioning, device penetration, tariff competitiveness and 4G/5G parity with private operators. Requiring Sikkim to move from 0 to 44 users per site, Assam from 23 to 67 and Jharkhand from 26 to 70 in one quarter, on a network whose availability is simultaneously admitted to be deficient, is an unreasonable burden on individual executives.

18. The escalation matrix converts every structural fault into a documented adverse record against the chain.

Section 11 of the SOP makes personal intervention mandatory at 4, 24, 48 and 72 hours and requires a mandatory RCA beyond 72 hours, while Section 12 requires an RCA for every P1 and every fault beyond 24 hours. On single-fed sites with no diversion and weak backup, breach at these thresholds is routine and unavoidable. The result will be a continuous stream of adverse documentation against honest officers, and a volume of RCA paperwork that will itself divert scarce field manpower away from actual restoration.

19. First-response capability rests on outsourced Level-0 staff over whom the accountable executive has no control.

The OM places the Level-0 field layer, expressly including outsourced staff, as first responder under the named pair, and the Appendix records agency-wise deployment. The executive has no administrative or disciplinary authority over outsourced personnel, no control over their attendance, retention, training or the frequent non-payment of their dues by agencies, and no power over the sufficiency of their numbers. Responsibility for the first response should not rest with an officer who has no command over the responder.

20. Acute manpower shortage, tower load and field safety have not been factored in.

Even the relaxed cap of 25 to 50 towers per pair is, in most SSAs, being applied to executives already discharging multiple independent charges with no relief and no substitute arrangement. The mandatory personal intervention thresholds will in practice require night travel to remote sites in difficult terrain and in law-and-order sensitive areas, without transport entitlement, security or any protection in the event of accident. Neither document addresses staffing adequacy, TA/DA, transport, or the safety and insurance of the officer who is being commanded to reach site.

21. Linking postings and place-of-choice to these KPIs is coercive and open to arbitrary application.

Para 8 of the OM extends preference in postings and place-of-choice to officers exceeding quarterly exit targets. Converting a target that is admittedly unattainable at structurally deficient sites into an entitlement to transfer and posting introduces an element of coercion into service conditions, disadvantages officers posted at weak-infrastructure sites through no fault of their own, and creates evident scope for arbitrary and non-uniform application across circles. Any such linkage requires prior consultation with the recognized Associations.

22. The Tagging Tracker and portal have been rolled out without validation, data safeguards or grievance provision.

The Appendix requires per-site capture of PER numbers, names and personal mobile numbers of five categories of departmental officers on an external web application, with a caution that data is lost if the browser tab is closed before confirmation. There is no stated provision for verification of mapping by the officer concerned, no mechanism to contest an incorrect mapping, no data-protection assurance for personal mobile numbers, and no appellate route where the portal score is wrong. Since scoring is expressly automatic and no score is to be computed manually, an unverified mapping will directly and irreversibly damage an officer's IPMS grade.

In the light of the foregoing, AIGETOA requests that:

(a) The scored KPI linkage introduced by the referenced OM be kept in abeyance and the OM and SOP be withdrawn in their present form pending consultation with this Association.

(b) A structured meeting be granted to AIGETOA CHQ with the Competent Authority and PGM (CM-NWO) before any part of the scheme is operationalised in the Q2 2026-27 IPMS cycle.

(c) Absence of media ring protection and inadequate or time-expired battery and power-plant capacity be expressly added to the relaxation clause of the OM, with responsibility vesting in the Circle and Corporate Office as already provided for EB failure and OEM spares.

(d) A site-wise exemption register of sites having no diversion path and/or deficient power backup be prepared by every circle, validated by the CGM, captured in the portal, and kept outside the scored KPI until the enabling infrastructure is provided.

(e) A time-bound and funded plan for ring protection, OFC route hardening, battery bank and power-plant augmentation, DG provisioning and EB feeder regularisation be sanctioned and communicated, with the availability trajectory of Annexure-A1 and A2 re-phased against that plan.

(f) The absolute 72-hour cap be made applicable to fault clearance within the officer's control, with a documented and non-adverse exclusion where restoration depends on capital works, EB action, third-party right-of-way or material supply.

(g) Multiple site outages traceable to one external or structural event be counted as a single incident for KPI and ageing purposes.

(h) Every officer be given visibility of, and a defined window to verify and contest, his own tower mapping and weekly portal score, with a named grievance and correction authority at circle and Corporate Office level.

(i) Manpower adequacy, transport, TA/DA, night-travel safety and insurance cover be settled before mandatory personal site intervention is enforced at the 4, 24 and 48-hour thresholds.

(j) The linkage of postings and place-of-choice to these KPIs be dropped, or in the alternative framed only as a positive incentive with no adverse consequence for officers at structurally deficient sites.

(k) A site-wise audit of engine alternator age, DG health, battery age/capacity, rectifier adequacy and cooling availability be completed before availability-linked scoring is enforced, with deficient assets placed in an identified infrastructure-gap register.

(l) A funded and time-bound program be implemented for replacement/augmentation of over-age engine alternators and battery banks, restoration of adequate cooling facilities, and establishment of a defined preventive/corrective maintenance mechanism for newly procured power plants after warranty expiry.

(m) ERPS protection and automatic traffic switching be technically validated on a site-wise basis, and locations where protection/diversion is unavailable or non-functional be excluded from adverse KPI scoring until the enabling resilience mechanism is commissioned.

(n) Vendor/OEM support arrangements for DMW and other critical network equipment be strengthened through defined response and restoration SLAs, escalation mechanisms and assured availability of critical spares, with vendor-caused delays excluded from individual executive accountability.

(o) The CNMC/IPMS and OMC Web monitoring platforms for 4G BTS (CEF) be synchronized and validated, with a single authenticated source of outage data and a mechanism for field officers to contest incorrect or inconsistent fault records before any KPI consequence is imposed.

AIGETOA reiterates that its executives are prepared to work shoulder to shoulder with the management to achieve every objective set out in the referenced OM. What we seek is that the burden be placed where the authority and the funding lie, and that no officer be penalized in his appraisal, his career or his posting for the absence of an asset he was never given.

We trust that these submissions, made in the larger interest of the network and of industrial harmony in the company, will receive your kind consideration.

With Regards

(Ravi Shil Verma)
General Secretary

Copy to:

1. **Shri K Balaji Ji, JS (Admin),** Sanchar Bhawan, Ashoka Road New Delhi for kind information.
2. **Shri Papa Sudhakara Rao Ji, Director CM/Ent, BSNL Board** for kind information and necessary intervention in this matter.