Annexure-A

Reference: BSNL Corporate Office Letter No. BSNLC0-RSTG/15(14)/1/2020-RSTG-Part(1) dated 28.08.2026.

BDM fully appreciates the need for reforms that genuinely improves service delivery, operational efficiency and customer satisfaction. However, any such restructuring in BSNL, which is already passing through serious financial and operational challenges, needs to be based upon **objective data, financial prudence, operational requirements and measurable outcomes**, rather than merely geographical redistribution of manpower. The larger aspects of revenue impact. Profitability and Human Resource which are crucial to run the company cannot be ignored. Accordingly, we submit the following for kind consideration please:

1. **BSNL should place on record a comprehensive assessment of the proposal in black and white**

BDM submits that before implementation of such a major organisational change, BSNL should place on record a comprehensive assessment covering the following for the information of all the stake holders:

1. Existing and projected customer/connections base;
2. Present and projected revenue;
3. Revenue potential of different areas;
4. Network utilisation and service requirements;
5. Existing manpower and workload;
6. Proposed manpower and additional deployment;
7. Number and nature of transfers involved;
8. Additional employee and administrative expenditure;
9. CAPEX and OPEX implications;
10. Expected improvement in service quality;
11. Expected additional revenue/business;
12. Productivity gains;
13. Break-even period;
14. Employee workload and field safety.
15. Measurable KPIs for evaluating the pilot.

2. **Restructuring should improve BSNL's operational capability**

BDM believes that the present priority of BSNL should be to strengthen:

Network quality + customer retention + revenue growth + enterprise business + operational efficiency + financial sustainability.

The organisation must ensure adequate manpower in revenue-generating and strategically important markets while simultaneously maintaining essential services in rural and remote areas. The restructuring exercise should therefore be integrated with BSNL's broader strategy for **5G readiness, 4G network expansion, enterprise business, FTTH growth, network**

modernisation and customer retention, rather than being treated as an isolated manpower redistribution exercise.

Moreover, it is very clear that management's focus is completely on the rural connectivity rather than the revenue generating urban areas, **Hence, the impact on the balance sheet of BSNL also needs to be addressed and if addressed, need to be made aware to the employees of BSNL** who are currently undergoing through phase of huge uncertainty, unrest and frustration with respect to the future and viability of BSNL.

3. **Public-service obligations and financial sustainability must go together**

BDM fully supports BSNL's role in providing telecom services in **remote, rural, tribal and difficult areas**, even where commercial returns may be comparatively low. At the same time, if BSNL is required to discharge such public-service obligations in the national interest, **the resulting financial burden should not be allowed to continuously weaken the organisation.**

Where the Government requires BSNL to undertake commercially unviable but socially or strategically necessary activities, an appropriate **policy-based financial support/compensation mechanism and delinking of the employee benefits like implementation of 3rd PRC, Pension Revision, Residual issues of 2nd PRC, Revision of Perks & allowances from the profitability/affordability of the company** needs to be considered and accordingly Management must make this demand firmly before the government. This would enable BSNL to fulfil its public-service mandate without compromising its long-term financial sustainability.

4. **Employee deployment should be linked with workload, business potential and service requirements**

BDM is particularly concerned that manpower deployment should not be determined primarily on the basis of geographical distribution. The appropriate parameters should include **customer base, revenue, network size, network utilisation, fault rate, workload, service demand, enterprise/business potential, subscriber density, operational complexity and future growth potential**.

A uniform manpower model may result in excess deployment in low-revenue areas while commercially important and high-workload areas remain inadequately staffed.

Therefore, BDM requests that the Uttarakhand model be reviewed on the basis of a **data-driven, revenue-and-workload-based manpower assessment**, duly factoring in the difficult terrain and special operational challenges of the State.

5. **Legitimate interests of Employees must be protected**

Organisational restructuring inevitably has a direct impact upon the career, postings, family circumstances and professional responsibilities of Employees.

BDM therefore strongly submits that:

1. Transfers should not become an automatic consequence of restructuring.
2. Existing functional requirements and workload must be assessed before deciding manpower reduction or redeployment.

3. Employees with specialised technical, commercial and managerial expertise should be appropriately utilised.
4. Seniority, eligibility, tenure, career progression and promotional avenues should not be adversely affected.
5. No arbitrary displacement of Employees should take place merely to fit a predetermined organisational chart.
6. The restructuring exercise should not create stagnation or adversely affect the career progression of the Executive and Non-Executive cadre.
7. Adequate opportunity should be provided to employees/recognised associations to submit their views before final implementation.

Reorganisation should ultimately improve utilisation of human resources, not merely rearrange human resources.

6. **<u>The proposed model envisages the number of posts which are not in conformity to the sanctioned strength notified and incorporated in MSRR</u>**

The proposed restructuring has been approved as a **Pilot Project** and is stated to be implemented through redistribution of existing working strength without creation of additional sanctioned posts. The Corporate Office letter specifically states that the Fourth Zone at Almora will be operationalized through redistribution of existing working strength without creation of additional sanctioned posts or increase in overall manpower.

However, if the proposed structure is to be implemented in its present form, there is a substantial reduction in the executive positions available under the existing sanctioned structure of Uttarakhand Circle.

As per the proposed arrangement, the cadre-wise position is understood as follows:

Telecom				**Finance**			
Cadre	**Existing Sanctioned Posts**	**Proposed Posts**	**Reduction**	**Cadre**	**Existing Sanctioned Posts**	**Proposed Posts**	**Reduction**
DGM	21	9	**12**	**DGM**	**5**	**1**	**4**
AGM	55	50	**5**	**CAO**	**15**	**1**	**14**
SDE	128	105	**23**	**AO**	**32**	**24**	**11**
JTO	140	132	**8**	**JAO**	35	**19**	**16**

Thus, the proposed arrangement effectively represents a reduction of sanctioned executive positions. This strength envisaged through the Corporate Office communication, is not aligned with the sanctioned strength of Uttarakhand Circle under the **MSRR-2023** and hence is violative of management's own notified RRs and Manpower Norms. The cadre-wise sanctioned strength proposed under the Pilot Project be **clearly mapped in line with the notified MSRR-2023 and the associated staffing norms**. No Employee should suffer in terms of promotion, seniority,

posting, career progression or future vacancy merely because Uttarakhand Circle has been selected as the pilot Circle.

7. **Deployment of 91 JTOs in GP clusters – clarification regarding tenure, rotation and working conditions**

The Corporate Office has clarified that 7,774 Gram Panchayats are to be serviced through 132 JTO-led GP clusters and that 91 JTOs are proposed for such deployment. It has further stated that JTOs are primarily field functionaries and should be deployed in field units.

The Association has serious concerns regarding the practical implementation of this arrangement. If **91 JTOs out of the available 132 JTOs** are continuously deployed in GP clusters, the following issues require specific clarification:

- What will be the **tenure period** of JTOs in GP clusters?
- Will the existing **soft tenure/tenure-based transfer policy** continue to apply?
- What will be the mechanism of rotation after completion of tenure?
- If there is no suitable substitute available, how will rotation be implemented?
- Will an Employee be compelled to continue indefinitely at a remote/rural location merely because a substitute is not available?
- What mechanism will protect Employees from indefinite field deployment?

The Association demands a discussion on the above aspects before reaching to any conclusion with respect to the proposed pilot structure. Association further demands discussion on following aspects also:

a. Proper and functional office space for the employees.
b. Adequate residential accommodation or suitable accommodation arrangement.
c. Proper office vehicle/field mobility arrangement.
d. Necessary communication, IT and internet facilities.
e. Clearly defined work profile and job-responsibilities.
f. Adequate technical and manpower support.
g. Proper safety and security arrangements for field staff.
h. TA/DA and other admissible facilities at par with current prevailing rates for extensive field movement.

The Association cannot support a model where an Employee is simply posted to a remote GP/Block without corresponding infrastructure and facilities.

8. **Zone-based restructuring cannot arbitrarily replace the existing SSA-based transfer framework**

The Corporate Office letter introduces four Zones—Dehradun, Haridwar, Almora and Nainital—and directs implementation of the revised arrangement.

However, the existing transfer policy has historically operated on the basis of **SSA/administrative units and the prescribed transfer framework**, and not on the newly created Zones.

Therefore, the Association seeks a categorical clarification:

How can the existing SSA-based transfer policy be implemented within a newly created Zone-based administrative structure without a corresponding amendment/revision of the transfer policy itself?

A new administrative structure cannot automatically alter the rights and eligibility conditions available to Employees under an existing transfer policy.

9. Withdrawal of relaxation/waiver in transfer policy is unacceptable

The Corporate Office communication states:

"Regarding one-time relaxation or waiver under the transfer policy there will be no waiver, except for PwBD cases and single women parents."

The Association strongly objects to this decision.

The Pilot Organizational Restructuring itself introduces a **new Zone-based administrative arrangement**, substantially changes the working environment and alters the existing posting/transfer framework. At such a stage, withdrawal of the existing relaxation/waiver effectively changes the applicable criteria **mid-way**.

This would adversely affect executives who may otherwise have been eligible to apply for OTP transfer outside the Circle or to their preferred location under the prevailing framework.

The Association submits that **employees should not be deprived of an existing opportunity merely because a new pilot restructuring arrangement has subsequently been introduced.**

Accordingly:

- The existing transfer provisions applicable before implementation of restructuring should be protected.
- Executives who have already become eligible under the existing policy should not lose their eligibility.
- A suitable transition/one-time window must be provided to executives before any new system is enforced.

10. No mid-session transfers

The Association strongly demands that the implementation of the pilot project should **not result in mid-session transfers**, particularly in the case of Employees whose children are studying in schools/educational institutions. Hence, pilot project even with the changes suggested by the stakeholders should be implemented only **after completion of the academic session only**.

11. Protection of residential accommodation till finalization of the pilot project

Since the arrangement is explicitly a **Pilot Organizational Restructuring**, its long-term continuation and final structure are yet to be established.

If any agreed model is reached with thorough discussions with stakeholders, then employees should be permitted to **retain their existing residential accommodation until the pilot project is evaluated and its final structure is notified**, subject to applicable rules.

An employee should not be compelled to vacate residential accommodation merely because of an experimental/temporary administrative arrangement, particularly when the ultimate structure itself is not yet finalized.

12. Clear criteria for evaluation of the Pilot Project

The Corporate Office communication repeatedly refers to the objectives of optimum utilization of manpower, strengthening field operations and achieving the objectives of the Pilot Organizational Restructuring.

However, no measurable parameters have been specified to determine whether the pilot project is successful or unsuccessful.

The Association demands that **objective and measurable Key Performance Indicators (KPIs)** be identified and notified, including:

- Revenue growth;
- Profitability
- Customer acquisition and retention;
- FTTH/BB growth;
- Network availability;
- Fault restoration time;
- BTS/network performance;
- Enterprise business growth;
- Rural/GP service delivery;
- Productivity per Employee;
- Customer satisfaction;
- Financial viability;
- Manpower utilization;
- Employee workload and field safety.

The evaluation should not be based merely on numerical manpower utilization but should be based on the changes on the quantified values of identified KPIS.

13. What happens if the Pilot Project fails?

This is a fundamental issue.

Since the arrangement has been introduced as a **Pilot Project**, there must necessarily be a clearly defined **exit strategy**.

The Association therefore demands clarification on:

What will be the course of action if the pilot project does not achieve its intended objectives?

In such a situation:

- Will the previous organizational structure be restored?
- Will the reduced sanctioned posts be restored?
- Will Employees transferred under the pilot arrangement be brought back?
- Will promotional avenues lost during the pilot be restored?
- Who will bear the administrative and financial consequences of reversal?

There must be clarity and firm written assurances on the scenario when any agreed pilot model fails to deliver its intended objective and such **failure of the agreed pilot project model should not permanently prejudice the service conditions and career prospects of employees of Uttarakhand Circle.**

14. Workload assessment must precede manpower redistribution

The proposed structure appears to redistribute manpower primarily on the basis of available working strength.

However, **working strength and actual functional requirement are not the same thing**.

Before permanently redistributing/reducing posts, a proper workload study should be undertaken considering:

- Geographic terrain of Uttarakhand;
- Difficult/hilly areas;
- Distance between administrative centres;
- Network spread;
- Number of exchanges/BTS/FTTH/OLT;
- Customer base;
- Enterprise business;
- Revenue potential;
- Disaster/emergency response requirements;
- Travel time between locations;
- Rural and remote area service obligations.

Uttarakhand's geographical conditions are fundamentally different from compact/plain Circles. Therefore, a uniform manpower model based solely on numerical parameters may not provide an equitable assessment.

15. No dilution of promotional avenues

The reduction of DGM, AGM/CAO, SDE/AO, JTO/JAO positions has a direct bearing on the **career progression and promotional opportunities of executives**.

The Association demands that no restructuring exercise should result in:

- stagnation;
- reduction in promotional vacancies;
- delayed promotions;
- abolition of functional posts without alternative career avenues;
- arbitrary re-designation of posts;
- Deterioration of existing promotional prospects.

Any restructuring must have an accompanying **career-protection mechanism**.

16. Proper consultation with Association/employee representatives

Considering the magnitude of the proposed restructuring and its direct impact on Employees, the Association requests that a **formal consultation meeting** be convened with the Association before final implementation.

A pilot project affecting hundreds of Employees across a geographically difficult Circle cannot be implemented merely through redistribution orders without resolving the genuine concerns of the affected employees.

17. Request for a transition period

The Association requests that a reasonable transition period be provided before implementation of any agreed model so that:

- employees can understand their new roles;
- infrastructure can be established;
- residential accommodation can be arranged;
- vehicles can be positioned;
- office facilities can be created;
- transfer issues can be resolved;
- workload can be assessed;
- cadre-wise deployment can be rationalized.

BDM reiterates that it is **not opposed to improvement in organizational efficiency or strengthening of field operations**. However, efficiency cannot be achieved by merely reducing Employee positions, increasing field deployment and restricting transfer opportunities.

The Pilot Organizational Restructuring should be **employee-sensitive, infrastructure-backed, objectively measurable and reversible**, particularly because Uttarakhand has been selected as the pilot Circle.

Accordingly, BDM requests that implementation may be kept in abeyance till the issues flagged above are sorted out, discussed and a consensual view emerges out. Further we also demand for resolution of the following:

1. Alignment of the proposed model with the corresponding MSRR-2023 and associated staffing norms.

2. Protection of promotional avenues.
3. Clear tenure and rotation policy.
4. Adequate office, residential and vehicle infrastructure.
5. Protection of the existing SSA-based transfer framework or formal amendment of the transfer policy.
6. Restoration/provision of an appropriate one-time transfer opportunity during the transition.
7. No arbitrary mid-session transfers.
8. Permission to retain existing residential accommodation till finalization/evaluation of the pilot project.
9. Clearly defined KPIs and independent evaluation mechanism.
10. Written exit strategy in case the pilot project fails.
11. Workload-based assessment before permanent manpower reduction.
12. Protection against adverse impact on promotion, seniority and career progression.
13. Resolution of HR issues including 3rd PRC Residual issues of 2nd PRC and one promotion to all the eligible employees to the higher grade.
14. Consultation with the Association before further implementation.

The Association expects that these legitimate concerns will be considered objectively in the interest of both **BSNL's operational efficiency and the legitimate service interests of its Employees**.

In view of the above, BDM submits to kindly consider the following:

i. Keep implementation of the proposed **Uttarakhand Pilot Project in abeyance** until a comprehensive operational, financial and cost-benefit assessment is completed.

ii. to prepare a detailed **five-year projected Revenue–Expenditure–Profit/Loss statement** for the proposed model.

iii. Direct an objective assessment of the **existing versus proposed manpower**, including workload, customer base, revenue, network requirements and business potential.

iv. Ensure that any transfers arising out of restructuring are based on **objective organisational requirements and transparent criteria**, and that the legitimate service and career interests of Employees are protected.

v. Establish clear and measurable **KPIs and a fixed review period** for the Uttarakhand pilot, if any agreed model is implemented.

vi. Ensure that the restructuring does not adversely affect the **career progression, promotional avenues, functional utilisation and professional growth of the cadre**.

vii. Adequate institutional support/compensation by the government may be provided as BSNL is required to discharge commercially unviable but socially necessary rural, tribal and remote-area obligations.

viii. Establish a mechanism for **periodic post-restructuring review and accountability** so that organisational decisions involving substantial financial and human resources are evaluated against their stated objectives.

ix. Review the existing **affordability condition applicable to BSNL employees** and consider extending the legitimate benefits of **3rd PRC and other financial benefits** to BSNL employees, keeping in view their continued contribution to BSNL's revival and national telecom objectives.

x. Resolve the residual issues of 30 Percent SAB, Standard Pay Scales of E2 and E3, resolution of various pay loss issues pertaining to the residual issues of 2nd PRC pending since 01.01.2007.

The employees of BSNL have repeatedly demonstrated their commitment by working under challenging conditions, including difficult and remote areas, and by supporting the organisation during its revival and network expansion.

It would therefore be in the larger interest of BSNL that every major organisational restructuring is preceded by a proper assessment of **cost, revenue, customer base, workload, manpower requirement, service obligations and long-term sustainability**, and is followed by an objective review of its actual outcomes.

We therefore earnestly request your kind intervention to ensure that the proposed Uttarakhand restructuring be **reviewed objectively and a consensus be arrived at before implementation**, and that any organisational model ultimately adopted is one which strengthens BSNL both operationally and financially while protecting the legitimate interests of its employees.

With regards,

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