

SNEA as an association and individual members also never opposed need base transfers and it may be seen that the executives who are now targeted quoting their stay of 26 years in particular Circle have already undergone repeated/multiple transfers within their Circles including Circle Tenure/All India Soft Tenure stations.

But SNEA has always opposed the rotational transfers at any level as being done now. Also, BSNL has never issued Rotational transfer in such way being issued now and such mass rotational transfers were issued at SSA or Circle level. Rather BSNL CO has issued guidelines to Circle to apply austerity measure on transfers and keep on hold any such rotational transfer. Copy attached.

It is not clear how the criteria of 26 years as long stay have been arrived by the management. Even if for name sake we agree that the criteria of 26 years long stay for inter Circle transfers is correct, the stay counted for arriving at 26 years is wrong. Now, 26 years stay has been proposed for the Inter Circle Transfers and for inter Circle Transfers stay is to be counted from the date when Executives enters in SDE/AO Cadre and not from JTO/JAO or JE Cadre as being done now.

It may be kindly noted that till today also JTO/JAO are Circle Cadres and if anyone want to opt out of Circle, he/she has to apply under Rule 8 for permeant Transfer that to be by losing his seniority in transferred Circle. Even in case of critical illness or extreme difficult conditions also JTO/JAO is not able to get transfer before five years and he has to work on deputation under Rule 9. Hence counting of stay for long stay all India from JTO/JAO Cadres which are Circle cadres is not correct and hence needs review of entire process.

There is general feeling among the affected executives that these transfers are proposed and issued by targeting SNEA Members as SNEA has started agitational programme against the BSNL Management demanding implementation of Time Bound Promotions, Standard pay Scales and Promotions for executives of BSNL. We believe that this is not moto of BSNL management as Worthy CMD BSNL has made it clear to us that he is not vindictive against any executive or any association as he has to achieve big Goals and success stories for BSNL in strong support of BSNL. Cancellation of these rotational transfer and making and limiting it only to minimum required transfers from Circles/SSAs having excess Executives to SSAs/Circles having shortage of executives as already proposed by CMD BSNL. SNEA has always supported for such transfers in about all Circles rather it was demanded by Circes like Chhattisgarh Circle but unfortunately not supported by administration which is against stand of Worthy CMD BSNL.

If management is having idea to transfer the officers who has not undergone any transfer within SSA/Circle or is working at same SSA for any reason including working in Non-Recruiting Circle, same has some logic, but this idea of again transferring these executives on name of out of Circle transfer is nothing but deliberate harassment and hence needs to be taken care by Management.

As per statement by Hon. CMD BSNL in Meetings with Recognised Unions/Associations, it was proposed only for transfer from excess to Shortage Circle to fill certain vacant posts. But here transfers are issued randomly and only criteria followed in 26 years of age.

BSNL is passing through bad financial conditions and it is known fact that even months SAB Contribution is not paid by BSNL and forget about forgiven benefits of the executives including money required for day-to-day operations, then the waste of hard-earned money of BSNL on such rotational transfers is unwanted at this stage when BSNL is gearing up and CMD BSNL is working on getting proposal of Two Lakh Corer for BSNL. Such mass transfers at this stage will have directly impact on these projects which will be life time loss. As per CMD BSNL, if we miss this opportunity of BSNL Revival 2.0, there will no further opportunity for revival and survival of BSNL.

As such, when BSNL is passing through deep financial crises and not having money even for minimum required expenditure in time, no expenditure should be made on such mass Transfers

Executives are already going through hardship has many financial Burdon are thrown on them in terms of GTI, GHI subscriptions and they should not be compelled to again have recurring expenditure on such avoidable transfers giving threat to revival of BSNL.

AIGETOA is propagating that these transfer orders are issued by them by creating pressure on BSNL Management. It is propagated by them that these transfers are specially issued by them to create the vacancy for their members who are likely to be promoted in coming days with assurances to post the promoted executives where it is as it is basis. In recent past we have seen some decisions of management which are inclined to AIGETOA propaganda, but here, we do not find any scope for their say except misleading information as AGM/DGM and SDE vacancies are available everywhere.

There are certain lacunas in finalisation of post of different Cadres and wings and it is crystal clear that the post justified as per Norms given for justification of any post are not adhered and less post are justified than the norms. Hence the present basis for calculation of Excess/Shortage of executives is not done on proper basis. Till, we have no objection if few transfers are issued to meet shortages. If management is really worried about the filling vacant posts, first it is required that the justification of post Transfers from Excess to deficit circle can be done as per actual requirement with proper restructuring.

It is seen that many of executives under transfer are due for promotions and very shortly they will be promoted. Now they are transferred under one particular cadre as there is vacancy of that cadre but after promotion there will be again shortage in particular cadre and there will be excess executives win promoted cadre and again the person due for promotion from that particular Circle will be transferred out of that SSA/Circle which will make it multiple transfer involving cost of multiple transfers.

When these 26 years long stay transfers are issued from BSNL CO, some of Circles are making plan or already planned issue rotational transfers with service criteria of 10 years in particular location and it will create financial burdon on each and every Circle.

Further, it needs to be given consideration that executives are transferred from one Circle to another Circle under rotational transfers it will not be one to one

transfer as exact number of transfers are not being issued from and to particular Circle. As such, there will be more transfers to fill vacancies created due to these avoidable Inter Circle transfers.

It has not been noted by BSNL management that it is not matter of only hundreds of inter Circle Transfer orders, but it is matter of further hundreds of transfer orders with Circles.

Further once these hundreds of transfer orders are implemented this year, these executives will be asking for transfer back to parent Circle after two /three years and that time again equal number transfers will be issued for posting substitutes. This chain once created will be continued in BSNL till there is no new recruitment in BSNL and it is already underlined that after VRS there will not be any outside recruitment and BSNL has to manage the works within the existing executives

Thus, expenditure on transfers will not be limited for this particular year for particular Circle and it will be there for life long recurring expenditure on repeated transfers.

The executives join BSNL by keeping in mind its PAN India presence and with hopes that he/she will be able to work at place of his/her family need and requirement. This is one of the facilities that an executive us getting in BSNL which attracts executives in joining BSNL even though salary in BSNL is less as compared to other services and organisation. This facility may be indirectly withdrawn by starting avoidable Rotational transfers when BSNL is not about all facilities are none other facility is being provided due to financial crises.

The data of long stay list was published by counting age as on 31/03/2022. But Orders are issued on 02/05/2022 for which age is to be calculated as 31/03/2023. As such some executives who are aged barred for Inter Circle Transfers during Year 2022-23 are also transferred List of such officers is attached as Annexure-

The revenue earning and Profit-Making Circle like Kerala which is having deficit of executives is targeting and about 47 AGMs are transferred out of Kerala and new 40 AGMs are posted to Kerala.

From the guidelines issued for transfers calling for options it was mentioned which Circles are having shortage of Executives and which Circles are having excess and which Circle has average executives. But while issuing transfers, nothing is seen about criteria of excess/shortage and about 500 transfers are issued at company cost.

Many of the AGM level Officers under transfer are working as BA/OA Heads their transfer in mass will definitely affect the overall working of OA/BA and will directly impact against aim of CMD BSNL to complete new projects in time Bound Manner. When SSA Heads and DGM level officers are transferred in mass, there will be mass effect on overall working of executives. Many of the executives have cope up with vacuum created after VRS and this attempt to transfer executives in mass will directly impact working of many SSAs and Circles.

Since BSNL's business is more oriented with the local customers, Language and geographical awareness and our public contacts over the years are very important

for generating more business. Any person will take minimum one year to adapt with new conditions, then in next one or two years they will have to be brought back to their home circle, again next cycle to be started for the relieving of the former and so on.

BSNL is having multi-level of work culture like indoor and outdoor sections of normal external plant, indoor and outdoor of transmission sections, data network, FTTH is the new attraction for the customers, Indoor and outdoor management of Mobile network, Sales and marketing of different products, EB section, Legal Section, Management of different agencies like cluster partners, franchisees, LCOs etc, management of CSCs and so on. Many of these sections are not working in a common platform. Hence even in a same circle or same BA, interchanging of section itself may take some time for officers to get used to it. When this is the reality, shuffling them between the circle just for the sake of transfer is really illogical.

We can understand that a small portion is being transferred to a shortage or hard tenure area for keeping up the service, but this is not for filling up any shortage, but just interchanging equal number of officers between two circles also in some cases.

BSNL CO vide letter dated 17/11/2017, has clarified the need of technical expertise in Non-territorial and Specialised Circles and has given preference for posting of technical executives in same Compartment of Circles. But same is not taken care in these Rotational transfers and executives are randomly transferred against their options. Specifically, the technical brain in Non-Recruiting Circle is compelled in Telecom Circle and Field Experienced hands are compelled to work in CNTX Circles.

Though it is projected as Mutual Transfers among two Circles as there will not be disturbance to executives, it is fact that there is overall difference in working and executives under transfer may not get Mutual transfers as they will be posted randomly.

Some executives have applied for Own /company Cost Request transfers to J&K Circle and eagerly waiting for transfer orders, but their names are not given consideration and some unwilling executives from Inspection Circle are posted to J&K Circle.

The options are called from some of Executives by publishing long stay list and under compulsions created many of them have opted for some Circles, but while issuing posting orders, their choice is not given consideration, while others are compelled to work at these Circles defeating very purpose of calling options

Total 47 experienced AGMs (most of them are looking after as DGMs) out of the 125 regular AGMs against 450 sanctioned (after restructuring) are transferred from Kerala circle to other circles. This has created severe administrative crisis in Kerala circle, even though 41 are posted against them from other circles. The new incumbents cannot perform to their capacity due to difference in languages, a peculiar issue exists only in southern states of India. Kerala circle cannot post all of them to the CGM/GM offices as a remedy and if posted to field units, they cannot perform to their best due to language problem and other issues due to

totally new place of posting and typical issues in extracting works from local workers who are strongly united.

As per Transfer Policy, there is no guidelines for issuing transfer orders just on basis completion of 26 Years in particular Circle. Thus, arbitrary application of 26 years criteria has created unrest among the executives who have rendered services of 26 to 30 years in BSNL.

As per transfer policy guidelines maximum 10% Transfers can be issued in a financial year, but same is not followed in case of many Circles. This criterion is not followed for many Circles and classic example is Kerala Circle. The transfer policy 2008 envisaged in BSNL clearly clarifies that "the number of officers transferred out of circle at any time would not generally exceed 10% of the of the sanctioned strength in the circle". Therefore, transferring executives 37% of the executive strength in AGM cadre and similar percentage in SDE Cadre, that too from a declared deficit circle is not justified and hence needs review. This is direct loss to profit making Circle

As per clause 6(h) of transfer policy, the persons with disability are exempted from Transfers, but in present orders some of executives with disabilities are transferred even though they have submitted requests along with all supporting medical documents and cases are duly recommended by BA/Circle heads with entry in ERP as directed by BSNL CO. It may happen that data is not practically scrutinised after extracting it from ERP.

As per clause 6(i) of transfer policy, the parents of Care giver of disabled child are also exempted from transfers, and such requests are recommended by BA/Circle heads, but their requests are not given consideration. The same has been reproduced as per the BSNL CO letter dated 07/04/2016.

As per clause 11 (b) minimum stay of three years at place of posting shall be maintained to avoid hardship to executives and in this transfer order many executives who are recently posted either on their requests or as per administrative connivence are also transferred which is against transfer policy guidelines. The same guidelines are reiterated again vide letter dated 22/01/2016 under clause 9 (d)

As per clause 11 (d) stay of executive for inter Circle Tenure Based Transfers is to be counted to be restricted from date of Regular promotion as SDE or other equivalent levels above. In present rotational transfer stay is counted from JTO Cadre and not from SDE Cadre. In same clause it is mentioned that stay should be counted from the entry in the executive Category and thus many of Executives who worked as JTO before 1999 were non-executive cadres and hence there stay needs to be counted from the date from which they have entered in Executive Cadre or their SDE Regular Promotions for tenure-based transfers. If stay is correctly counted, none of the executive is due for Rotational transfer under 26 years as being done now.

As per clause 11(e) of Transfer policy, the Break in Tenure is to be counted only if the executive has completed two /three years Tenure at the Tenure stations. Accordingly, about all executives at Tenure Circles like J&K, Assam, NE-I and NE-II have completed Tenures within Circle and hence are immune for transfer out of

the Circles. These Circles as whole are All India Hard tenure stations and hence there should not be any transfer out of these Circles.

As per clause 11 (k) of transfer policy, the transfer of executives up to SAG Grade with age 56 years as on the 31st March of the financial year are avoided. But in present case some of executives who have completed or completing age of 56 years as on 31/03/2023 are also included in the Rotational transfers.

As per modified clause 13 (iv) of transfer policy, Circle heads are empowered to evolve the policy for rotation of executives and except few about each and every executive has undergone such transfer and hence none of them is at same place of posting till today. Even many are repeatedly transfers within SSA/Circle which clears their turn of rotational transfers and there is no need of rotational transfers as being proposed as per unknown criteria of Rotational Transfers.

As per modified clause 13 (iv) of transfer policy, the persons posted at Tenure stations are allowed to continue beyond two years tenure period if they volunteer and here the executives from All India Hard/Soft Tenure stations have already opted for continuation at these stations, but again their transfer orders are issued against the guidelines and executives who opted to continue at tenure stations are now feeling as cheated as they believed on written transfer policy and accepted posting and continuing to work at All India Hard/Soft tenure stations.

As per modified clause 10 (3) of Transfer policy, for inter Circle transfers, Director HR is the competent authority for deciding on transfers of JAG/STS and equivalent level Officers and hence decision to review transfers can be taken at level of Director HR.

BSNL do not have money to grant Transfer Grant advance to the executives under transfer and many are compelled to first get transferred and then he/she has to submit the TA Bill, which are not paid for months together due to scarcity of funds. Hence, such mass transfers will create hardship to executives in joining new place of posting and getting expenditure reimbursed.

Many of the executives rather, about all executives have reached to such age of service and family life that none of them can shift family at this stage of service /family life. Some of them are having some individual/family medical issues and there is need of family members with each other to take care of such age bound medical issues and transfers at this age will be most difficult part of their life, if compelled to join at new place of posting that to be in totally different area, cultural and even language issues.

As per normal practice followed in BSNL over the years, the ladies' executives are not transferred out of Circle. In some such cases for which inter circle transfer order was issued on promotions, same were cancelled by taking lenient view. But in these rotational transfers, all ladies are transferred in mass. It is important that this is first time that lady's representation has increased at AGM/DGM level and immediately they are transferred out of Circle. It is required that female executives are avoided from all such long stay transfers outside Circle as they are pillars of their family and it will be most difficult for them to shift at stage of age and hence there is need to give sympathetic consideration to all such requests.

Some of executives have opted for transfers to Tenure and Non-Tenure Circles long back, but their requests are not given consideration and are posted to odd and difficult Circles. Most Important part is that all these requests are submitted under OTP since first Cycle of OTP was introduced in BSNL. Some of them have applied for these Circles in hard copy even before the OTP transfers were introduced. Vacancy also exists in these places/Circles and other executives in same cadre are posted to these places/Circles but their request is denied without assigning any reason even though they have applied at Own Cost.

After calling for long stay data, many Circle Heads have conveyed their difficulties in meeting assigned targets if experienced hands are transferred by such rotational transfers. Even after issuing Transfer orders also, some of CGMs have conveyed issues in rotational transfer and the genuine concern of Circle Heads needs response from BSNL Management, but same is not seen here. Circle Heads are responsible for running Circles and if their views are neglected, it will not be in the interest of organisation.

As it is not possible for all executives to join new place of posting, some of them have submitted or submitting resignation /Voluntary Retirement from services. This number may increase if rotational transfers from BSNL CO are not stopped. By this way experienced hands of BSNL will be out of workforce which BSNL cannot afford at this stage when already thousands of technical experts have left BSNL in Mas VRS 2019. Their resignations if any needs to be entertained by Working Circle and no one should be compelled to join on transfers if he/she has submitted VR before relieving.

Executives recently posted to All India Hard Tenure stations are again transferred under long stay Transfers to another All India Hard Tenure stations, which clears that data taken for transfers is not correct.

Many other executives have applied for retention for specific period of one year on grounds of education of Children and such requests from wards having Son/daughter in 10th or 12th are given consideration, but same is not given consideration in these transfers even though requested are duly recommended by Circle Heads.

The optioned were called by counting age as on 31/03/2022, but as transferred are issued on 02/05/2022, the data extracted is by counting age as on 31/03/2022. Hence some names are added in the long stay list by counting their stay of 26 years as on 31/03/2023 and no options were called from them for choice Circle and all are randomly transferred at odd and unwanted locations, wherein vacancy exists at the places where these executives can be accommodated if they give opportunity to submit option. It can be understood that new names are added by counting long stay as on 31/03/2022, but in similar lines it was expected that names of the executives who are completing age of 56 years as on 31.03.2023 are removed from the long stay list as they are aged barred for such transfers. But no such action is taken and age barred executives are also transferred without any corrections in their stay.

As called by the BSNL CO about eligibility for immunity from transfers, many of the Office Bearers of SNEA have already conveyed details of the post they held in association and availability of immunity thereof and their cases are duly recommended by BA/Circle Heads with entry in ERP, but it is seen that majority of immunity cases on grounds of association post are not given consideration.

Executives recently joined at Hard tenure stations also transferred as long stay

It is also reported that some of executives who are having higher stay are retained and some with less stay are transferred and it is not clear what are the reasons for such retention or even not issuing transfer order. It will be better if list of such executives retained or excluded from transfers is published for information of all and mainly for clearing confusion among the executives.

One side it is stated that there is shortage of executives in CNTX Circles and all executives who are completing all India Hard tenure stations are compelled to opt and join CNTX Circles and other side executives from CNTX Circle are transferred to Telecom Circles which is contradicting with stand of management. If there is no shortage then tenure completed executives should not be compelled to join CNTXW or transfers of Executives out of CNTXW should be cancelled.