



SC/ST EMPLOYEES WELFARE ASSOCIATION OF BSNL(SEWA)

(The Recognised Association In BSNL Regn.No.:S/58891/2007 Delhi)



CENTRAL HEAD QUARTER

Chief Patron: **N.D.Ram** (M:9868094176)

Chief Advisor: **PN.Perumal** (M:9444545696)

National President

S.Titussam

M:9486102676

Finance Secretary

G.Vairamani

M:9486103766

General Secretary

Ashok Patel

M:6357934229

SEWA BSNL CHQ/2024-27

Dated- 05.07.2026

To,
The Chairman & Managing Director (CMD)
Bharat Sanchar Nigam Limited (BSNL)
BSNL Corporate Office
New Delhi – 110001

Subject: Representation regarding Revenue-Based Organisational Restructuring, Review of Geography-Based Restructuring Policy, and Accountability in Organisational Reforms.

Reference:

Office Order No. BSNLCO-RSTG/15(14)/1/2026-RSTG dated 04.07.2026,

Respected Sir,

The SC/ST Employees Welfare Association places on record its sincere appreciation for the dedication, commitment, and hard work of BSNL employees across the country. Despite severe manpower shortages, financial constraints, technological challenges, and intense market competition, employees have continued to provide Telecom services in urban, rural, remote, border, and disaster-affected areas with utmost dedication and professionalism.

The Association firmly believes that BSNL employees are its greatest strength and have played a crucial role in sustaining the organisation during difficult times.

However, the Association is deeply concerned that during the current year, a large number of inter-circle transfer orders were issued and many employees were compulsorily relieved. In the view of the Association, these transfers were implemented without adequately considering operational requirements, employee expertise, local business needs, and their financial and administrative impact on BSNL.

These transfers have caused significant hardship to employees and their families, resulted in substantial expenditure on transfer-related claims, disrupted continuity of work, and adversely affected service delivery at several locations. The Association is of the considered view that major administrative decisions should not be taken merely for procedural compliance, but must be based on objective criteria, business necessity, manpower planning, and the larger interest of BSNL.

The Association respectfully submits that organisational restructuring and transfer policies must be guided by a clear long-term vision aimed at improving revenue, operational efficiency, customer satisfaction, and organisational stability. Every major policy decision should be preceded by a comprehensive impact assessment and followed by measurable performance evaluation to ensure tangible benefits to BSNL.

Where a policy decision fails to achieve its intended objectives or results in avoidable financial loss or operational disruption, a structured accountability mechanism must be in place to review such decisions and incorporate corrective measures in future reforms.

With reference to Organisational Restructuring

On behalf of the members of SEWA SC/ST Employees Welfare Association, we submit this representation regarding the organisational restructuring being implemented in BSNL vide Office Order No. **BSNLCO-RSTG/15(14)/1/2026-RSTG dated 04.07.2026**, whereby **Uttarakhand Circle has been designated as the pilot Circle** for implementation of a six-level geography-based organisational structure.

The Association firmly believes that every organisational reform must ultimately strengthen BSNL's financial position, improve customer satisfaction, and ensure long-term sustainability. However, the present restructuring model raises certain concerns which require careful consideration before nationwide implementation.

Key Observations

Historically, during the Department of Telecommunications (DoT) era, manpower deployment was largely based on customer connections and operational workload. In the present competitive telecom environment, BSNL's performance is driven by revenue generation, customer retention, enterprise business, FTTH expansion, and mobile market competitiveness.

In this context, restructuring based primarily on geographical boundaries may not effectively address BSNL's financial challenges. Uniform manpower distribution without considering revenue potential, customer density, subscriber base, or enterprise business potential may lead to sub-optimal utilisation of human resources.

Proposed Business-Based Parameters for Manpower Deployment

The Association respectfully submits that manpower deployment should instead be guided by objective business indicators such as:

- Revenue generation
- Number of active customer connections
- Mobile subscriber base
- FTTH customer density
- Enterprise business potential
- Operational workload and service obligations

Such an approach will ensure optimal deployment of human resources in areas where they can contribute most effectively to BSNL's revenue growth and profitability.

Administrative Concern on Competent Authority, Financial Accountability & Employee Impact

It is pertinent to submit that the Chief General Manager, Gujarat Telecom Circle, has implemented a Circle-level staff restructuring vide Letter No. **GJCO-11/20(11)/112020-GJ-ADMN-Part(1)/E88086 dated 08.05.2026**, under which more than 250 employees were redeployed and transferred within the Circle.

Subsequently, the BSNL Corporate Office issued Office Order No. **BSNLCO-RSTG/15(14)/1/2026-RSTG dated 04.07.2026**, introducing a pilot restructuring model in Uttarakhand Circle for evaluation before nationwide implementation.

This sequence of overlapping restructuring actions raises a serious administrative, financial, and accountability concern regarding the **competent authority empowered to approve organisational restructuring in BSNL**.

It is respectfully submitted that such parallel or independent restructuring exercises, undertaken without clear delegation of authority or prior validation of the approved restructuring framework of the Corporate Office, may lead to:

- **Avoidable financial burden on BSNL**, including expenditure on transfer TA/DA, relocation costs, and repeated administrative processing;
- **Operational disruption and loss of service continuity**, adversely impacting revenue generation and customer experience;
- **Employee hardship, displacement, and administrative stress**, resulting in avoidable family disruption and workplace instability;
- **Systemic inefficiency in manpower deployment**, affecting overall organisational productivity and financial performance.

In view of the above, it is essential that **clear and fixed responsibility and accountability mechanisms be established at the level of the approving authority**, so that any financial loss, operational inefficiency, or employee hardship arising out of restructuring decisions is properly reviewed and attributed.

THE ASSOCIATION THEREFORE RESPECTFULLY SUBMITS THAT A CLEAR POLICY FRAMEWORK MUST BE ESTABLISHED TO DETERMINE:

1. **The competent authority empowered to approve organisational restructuring at Circle level**, particularly when a Corporate Office pilot project is under evaluation;
2. **Fixation of financial responsibility for losses to BSNL**, arising out of restructuring-related expenditure, repeated transfers, and administrative reorganisation;
3. **Accountability for avoidable employee transfers and resultant hardship/administrative stress**, ensuring proper review and corrective mechanism;

4. **Responsibility fixation on the concerned CGM in cases where restructuring is carried out without proper authority or beyond delegated powers**, including review of such decisions and determination of administrative accountability;
5. **Mandatory impact assessment and financial justification prior to implementation of any restructuring**, to ensure alignment with BSNL's revenue, operational efficiency, and service objectives.

It is further submitted that any restructuring exercise which results in avoidable financial expenditure, operational inefficiency, or large-scale employee displacement without measurable improvement in BSNL's revenue or service quality should be **subject to formal accountability review and responsibility fixation mechanism**.

Accordingly, clarity on authority, responsibility, and accountability is essential to ensure that organisational reforms are implemented in a transparent, financially prudent, and employee-sensitive manner in the larger interest of BSNL.

Points Requiring Clarification

The Association respectfully seeks clarification on the following:

1. Whether the Corporate Office or the respective CGM is the competent authority for approving organisational restructuring within a Circle.
2. In case a Circle-level restructuring results in operational inefficiency or financial loss, who shall be held accountable?
3. Whether measurable KPIs have been defined to assess improvements in revenue, profitability, customer satisfaction, network performance, and operational efficiency.

Request Regarding Pilot Project

The restructuring order clearly indicates that the Uttarakhand Circle is a pilot project and its outcomes will be reviewed after three months before nationwide implementation.

In view of this, the Association respectfully requests that no further large-scale restructuring or transfers be undertaken in other Circles until the pilot project is objectively evaluated and proven successful.

Additional Concerns

The Association also expresses concern that BSNL employees continue to be deprived of the benefits of the **3rd Pay Revision Committee (3rd PRC) and other financial benefits** due to the company's financial performance. Therefore, every reform must directly contribute to revenue growth and profitability.

Further, concerns have been raised regarding network quality in several high-revenue cities like Mumbai etc. Strengthening service quality in commercially important areas is essential to prevent customer migration to private operators and improve BSNL's competitiveness.

RECOMMENDATIONS

In view of the above, the Association respectfully requests that:

1. Future restructuring be based on revenue, customer base, business potential, and workload rather than geography alone.
2. The Uttarakhand pilot project be completed and independently evaluated before expansion.
3. No further large-scale restructuring or transfers be undertaken until pilot results are reviewed.
4. Clear guidelines be issued regarding competent authority and accountability framework.
5. Transparent KPIs be introduced for evaluating restructuring outcomes.
6. Greater focus be placed on strengthening network infrastructure and customer experience in revenue-generating areas.

Closing Submission


The Association remains committed to supporting all initiatives that genuinely strengthen BSNL and safeguard the interests of its employees and customers.

We therefore request your kind consideration of the above suggestions before any nationwide expansion of the pilot restructuring model.

We trust that this representation will receive your sympathetic, objective, and constructive consideration in the larger interest of BSNL.

With highest regards,

Yours Sincerely



(Ashok Patel)
General Secretary

Copy to: *For information and necessary intervention, if deemed appropriate*

1. Shri Jyotiradity M.Scindia, Hon'ble Union Minister, Ministry of Communications, Government of India.
2. The Secretary, Ministry of Communication, Government of India.
3. The Secretary, Department of Telecommunications (DoT)

: Correspondence:

D-3, Atul Grove Road, Behind Eastern Court, New Delhi-110001 Tel:011-23321792
Email : sewabsnlchqnd@gmail.com , Website : sewabsnlchq.com