



SANCHAR NIGAM EXECUTIVES' ASSOCIATION

KERALA CIRCLE OFFICE

(Majority Recognised Representative Association of Executives in BSNL)
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No.SNEA Kerala/2024-27/16

dated 18 June 2025

To

The Chief General Manager
Telecom, BSNL, Kerala Circle

Respected Sir,

Sub: Feedback and Strong Objections on Staff Restructuring Proposal and Implementation of 3-Tier System in BSNL Kerala – Reg.

Ref:1. BSNL CO Letter No. BSNLCO-COMN/12(11)/6/2024-RSTG dated 30.05.2025

2. Kerala Circle Office Letter No. KRLCO-11/11(16)/2/2022-HR AND ADMIN dated 13.06.2025
3. Meeting with SNEA on 10.06.2025 with Sr. GM (HR& Admn) and DGM (HR & Admn)

Respected Sir,

Greetings from **Sanchar Nigam Executives Association (SNEA), Kerala Circle.**

We wish to bring to your kind attention the serious concerns and dissatisfaction of the executive community in Kerala Circle regarding the proposed **3-tier restructuring hierarchy**, as communicated vide Circle Office letter no. **KRLCO-11/11(16)/2/2022-HR AND ADMIN dated 13.06.2025.**

This communication is in reference to the **BSNL Corporate Office letter dated 30.05.2025**, which proposed a 3-tier reporting structure only as a **PoC in 10 identified circles and two non-territorial units**. Kerala Circle was **not included** in the PoC. In fact, the Corporate Office recognized **Kerala's current HR deployment and reporting model as a benchmark**, urging other circles to **take Kerala as a role model** for effective job assignment based on the **Golden Ratio**.

Therefore, no direction is given to Kerala Circle to implement a 3-tier hierarchy immediately. Instead, Kerala has been recognized for maintaining **effective role mapping and functional alignment** and is only advised to continue existing systems until PoC evaluation is complete.

Kerala Circle is one of the **most revenue-generating and efficient circles in BSNL**, operating with:

- 11 Business Areas
- 7 lakh+ FTTH connections
- 17,000+ mobile nodes
- ₹400 Crore+ annual EB revenue
- Over 1 crore active mobile customers
- 2,500+ LCOs and 50 franchisees
- 246 AGMs, 1327 SDEs/JTOs, and only 60 DGMs

Despite manpower limitations, Kerala Circle has **doubled its profits in the current fiscal year**, a result of consistent, dedicated effort by executives at all levels.

Kerala Circle, which has been designated by BSNL Corporate Office as a Shortage Circle, is currently operating with significantly lower manpower than the approved sanctioned strength. In this context, the implementation of the 3-Tier system, if done without adequate deliberation and ground-level assessment, may adversely affect our long-standing demand for additional manpower.

The letter issued by Kerala Circle proposes a 3-tier hierarchy of:

- Tier I – BA Head
- Tier II – DGM/AGM
- Tier III – SDE/JTO/JE

We place on record our objections to this structure, as it presents significant **functional and motivational challenges**:

We strongly object to the proposed 3-tier model (BA Head → DGM/AGM → SDE/JTO/JE):

a. Degradation of Executive Cadres

Clubbing **JTOs and SDEs with JEs** in the same reporting level undermines the **executive-non-executive distinction**, violating the spirit of **DoPT and BSNL policies**.

It demoralizes executives and creates confusion in role responsibility within the executive cadre and also seemingly **puts on hold all promotional avenues from JE to JTO** (moreover the same is not part of the broader guidelines of PoC issued only to the 10 Circles).

b. Blockage of Promotional Avenues

Thousands of JTOs (mainly from **2012 batch onwards**) are still awaiting their first promotion. Collapsing the reporting layers **narrows opportunities**, discourages talent, and renders the **DGM/AGM layer ambiguous**.

c. Collapse of Existing Functional Hierarchy

The current 5-tier system (PGM/GM → DGM → AGM → SDE → JTO) facilitates proper **control, responsibility sharing**, and supervision. Removing tiers **overburdens BA Heads**, affects timely decision-making, and creates **bottlenecks** in field operations especially without proper & adequate delegation of financial powers presently governed by GFR 2017.

d. Workload and Accountability Imbalance

An AGM may have **25+ subordinates** (SDEs, JTOs, and JEs). Without clear delegation and control mechanisms, this setup becomes **administratively unmanageable**, and accountability is lost.

e. Financial Delegation Issues

Currently, AGMs are empowered for only **Rs. 5000** and DGMs for **Rs. 10,000**. Mapping AGMs directly to BA Heads means all approvals beyond Rs. 5,000 must be routed to the BA Head, **delaying decisions** even on meagre amounts and **adding unnecessary load** at the BA Head level.

f. No Consultation with Stakeholders

This major change has been initiated **without prior consultation** with recognized associations like SNEA or field-level executives. This **violates established norms** of participatory governance in HR restructuring.

g. Negative Impact on Motivation and Performance

At a time when BSNL is struggling with **lack of pay revision, promotions, and workload stress**, such unilaterally implemented restructuring will **demoralize already overstretched staff** instead of empowering them.

We acknowledge that the Circle's restructuring letter dated 13.06.2025 contains some commendable ideas. However, major structural changes must be approached with **caution and in a spirit of collaboration**. In this regard, we would like to offer the following **constructive suggestions**:

- **Retain existing 4-tier model** in field operations for now.
- Limit 3-tier experimentation, if at all, to **BA HQs only**, as a pilot.
- **Role Specific Deployment:**
 - 24x7 NOC Operations: BA-wise dedicated teams are essential to manage the increasing network complexity and ensure uninterrupted services. The current staffing is inadequate to support this crucial functionality.

- Implement FM-RMC-RM mapping as per CM-S&D Policy and ensure RMs are not assigned to Franchisee Managers directly.
- NQM/RF shall remain separate with adequate strength and the coordination may be centrally monitored by GM (CM) Kerala for effective NQM Activities. The present condition of mobile coverage and quality monitoring is sub-optimal, and strengthening the NQM team with more trained personnel is essential to maintain and improve service quality.
- There is a noticeable imbalance in BTS count distribution across teams, with some teams managing an unreasonably high number of sites. A rational BTS-to-team ratio must be established, which necessitates deployment of additional manpower and taking into consideration factors such as terrain also.
- **Digitalization of OF Routes:** Involving retired staff for knowledge-based roles can greatly help, but with **defined deliverables** and transparent payment mechanisms.
- **Transmission/Fault Control Team/NIB/NOC Teams may effectively utilised** to increase the quality of service. Hence an EB Centric approach may be defined to increase the confidence of the EB Customer and thereby increase the business. Transmission forms the backbone of BSNL's network, interlinking critical elements across the service delivery chain. Although there are outsourcing tenders in place, the effectiveness of outsourced work is highly dependent on strong in-house monitoring and technical oversight. Without adequate internal Transmission teams, managing the core network and ensuring uptime, especially in areas with high Route Kilometer (RKM) coverage, becomes challenging. Each BA requires sufficient manpower along with vehicle/specialised tools with appropriate area responsibility to maintain and troubleshoot transmission infrastructure efficiently and promptly.
- **Revise Outsourcing Terms:** Integrated maintenance tenders must have proper SLAs and performance benchmarks for each individual stream (BTS/Media/Power). Past experiences have shown serious issues in cluster outsourcing.
- **Empower DGMs** with higher financial and administrative authority, to ease BA Heads' burden.
- **Postpone 3-tier restructuring** until PoC reports are received from designated circles and reviewed thoroughly by BSNL Corporate office.
- **Conduct BA-level stakeholder meetings** with majority recognised association participation before implementation.
- Allow **transparent reporting of staff mapping** and **publish post-wise role clarity** with measurable deliverables.

In summary, when there is an urgent requirement to enhance manpower at every operational level, proceeding with the 3-Tier restructuring in its current form—without proper consultation and due consideration of Circle-specific constraints—may lead to significant operational inefficiencies.

On behalf of all executives under SNEA Kerala Circle, we **strongly urge your office** to:

- **Hold back the implementation** of the proposed 3-tier model in Kerala.
- **Reinforce Kerala's existing model**, which has already earned Corporate Office's appreciation, which aligns closely with the Golden Ratio Norms.
- **It is suggested that the focus remain on addressing the technical/technological deficiencies of 4G/5G and Packet Core related issues** and not to deviate from the core issues by playing with the HR roles & functionalities.
- **Hold stakeholder consultations** before finalizing any change in reporting structure or HR deployment.

We are confident that your good office will take a **fair and pragmatic approach**, ensuring that Kerala Circle continues to perform as a leading Circle in BSNL without eroding the **morale, dignity, and efficiency** of its committed executive workforce.

With kind regards,
Sincerely Yours



Aslesh S. S.
Circle Secretary, SNEA, Kerala Circle

Copy to:

1. GS SNEA CHQ - for kind information and further necessary action.
2. Sr. GM HR & Admn, O/o CGMT BSNL Kerala Circle – for kind information and necessary action, with a request to consider these concerns before proceeding with implementation.
3. All District Secretaries, SNEA Kerala Circle – for convening discussions with respective BA Heads and ensuring detailed deliberation on the proposed three-tier system prior to its implementation.