

# SANCHAR NIGAM EXECUTIVES' ASSOCIATION

## KERALA CIRCLE

(Largest Association of Executives in BSNL)  
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**No.SNEA/Kerala/2021-22/29**

**dated 7-Feb-2022**

To  
The Chief General Manager,  
Kerala Circle.

**Sub:- Recovery of CAF Penalty from Employees Reg.**

Ref: 1) KRLCO-15/18(16)/2/2020-S&M-CM/5 dtd 15-06-2021  
2) DO No KRLCO-15/18(16)/2/2020-S&M-CM/19 dtd 23-11-2021

Kind attention is invited to the subject matter mentioned above. In the letter issued vide ref (1), it was communicated to the BAs that the TERM cell had imposed a penalty of Rs2,49,000/-towards the defective CAF to Kerala Circle for non-compliance of paper CAF samples audited for the period from Oct 2009 to Jan 2020, eKYC cases from 2017 to 2019 and the dKYC cases from 2019 (it is learnt that the total penalty as on date is Rs1936000/-). The concerned BAs were directed to recover the penalty from the originator of the CAF and to issue necessary sanction memos against the responsible employees/franchisees. It was also mentioned that if there is any case pertaining to retired employees, sanction memo is to be issued to recover the penalty from any of the pending medical bills of the employee.

Contrary to the directions given by BSNL Corporate office, issued from time to time on this subject, in the DO letter addressed to GMs by your good self vide ref (2) the accountability has been transferred to CAF approving authority instead of CAF initiator.

As it is known, it is the prime duty of BSNL to activate the SIM as soon as the SIM is delivered to the customer to be competitive in the market at par with other TSPs. In actual practice, BSNL SIM activation takes one or two days on an average, whereas other TSPs activate the SIMs instantly. Consequently, the retailers prefer to provide the SIMs of other TSPs to the customers. To reduce the SIM activation delay, the daily activations were closely monitored by CGMT by analyzing the new CAF submission, FRC and first call details pertaining to each BA.

To meet the huge targets and the compulsion from the top management, the employees of all verticals took extra efforts to conduct BSNL melas at bus stands, railway stations, festival locations, hospital premises, schools, and various public places. This was well reflected in the SIM sales records of Kerala Circle. This successful sale was the result of hard work of employees, stretched beyond office hours and in the prevailing Covid -19 Pandemics.

The self-motivated employees volunteered for the job with the exclusive purpose of increasing the revenue of our ailing organization. It is an irony to note that they are penalized instead of recognized. It seems that the entire credit of achievement of SIM sale targets goes to the top management of Kerala Circle and the frontline warriors of BSNL are penalized for the nanoscopic mistakes. While analyzing the list of penalty holders it is seen that maximum penalties are imposed to the best performers of SIM sales.

The approval of the innumerable CAFs augmented the workload of the CSC and marketing staff. They, in turn, assigned the work to other officials including the contract staff. The management advised the field staff to approve the CAF even during the late hours to reduce the activation delay. Because of the coercion from the higher-ups, there were many instances when the higher officers requested the login credentials of the subordinates to approve the CAF during late hours. If the CSC-in-charges were given enough time, the CAF approval could have been thoroughly scrutinized. In an effort to save its face, the management is claiming that it had given clear directions to the CSCs, but off the records pressure imposed on each executive during that period was beyond limits.

It is also seen that a very meager percentage of CAFs has invited penalty. The hard work and dedication of the employees for increasing the SIM sales were never acclaimed and they were never offered any incentive for the increased SIM sales. On the contrary, management has demoralized the employees by listing them out to impose penalty. Previously, the penalty fined was usually paid by BSNL. The same practice may be followed as errors in CAF verification have occurred due to the immense work pressure to increase the SIM activations and achieve the targets.

In this regard it may be worth noted that,

1. BSNL Kerala Circle has a market share of more than 20% in the mobile segment. In spite of the drawbacks of obsolete technology and high service issues, Kerala circle has captured this market share because of the vigorous marketing strategies followed over the years. Purely unintentional Errors in CAF might have occurred during such marketing melas since the official collecting the CAF was entrusted to conduct the melas in addition to their regular duties. These officials were not fully accustomed with the CAF completion formalities.
2. In Kerala Circle, CAF penalties were paid by BSNL itself similar to all other BSNL Circles. The CAF penalties have not been recovered from employees so far in any of the circles.
3. In Case of EKYC and DKYC CAFs, the CAF with errors could not be corrected and the same CAF may be selected for scrutiny in the next time too. To correct the error, circle has to initiate immediate measures to disconnect and then reconnect the number with a new digital CAF.
4. The Digital CAFs are mainly rejected because of the lack of white background in the photograph of the customer or because of issues with scanning of the ID proof

submitted by the customers. In the software used by the private operators, there is an in-built mechanism in the software itself to reject blur images, coloured or fade backgrounds, duplicate ID proof etc.

5. We fear that penalizing employees/franchisees may de-motivate them and this may considerably retard the momentum of new SIM activations especially in the background of high port-outs in BSNL.

The top management may initiate steps to take-up the matter of defective CAFs with DoT and get the time line extended for the correction of the same.

It may be recollected that BSNL is paying crores of rupees as penalty to the State electricity board due to the delayed payment of electricity bills for the past 3 years. The delay in the payment of GPF and pension contribution is also inviting huge penalty to the tune of crores of rupees to BSNL. BSNL is paying such penalties without any hesitation. BSNL has money to spend for the inefficiency of the management but it is not ready to pay penalty for the minor lapses occurred during a customer acquisition and revenue generation drive.

At this juncture, it is submitted that, if the administration is proceeding with the recovery of penalty, we may advise executives to approve the CAFs with great caution and to strictly adhere to guidelines. No risks should be taken by the employees in the CAF approval even though it may adversely affect the activation of SIMs. If management is adamant to pass on the responsibility of penalty to employees, we demand with great protest that the penalty may be divided to all employees of the circle equally irrespective of any cadre since the initiators have taken the risk for betterment of BSNL and not for any fraudulent activities.

If management does not refrain from the recovery, this association may be forced to stage protest against the Circle administration by collecting the penalty amount from the employees and even from the general public through voluntary contribution.

Thanking You,

Sincerely Yours



**Jithesh K P**  
**Circle Secretary**  
**SNEA Kerala Circle**