

Association of Radio & Television Engineering Employees

Post Box no. 422, New Delhi-110001

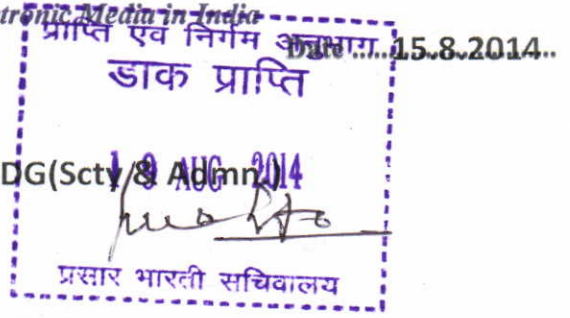


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Largest Employee Welfare Association of Electronic Media in India

Ref :ARTEE/P/274/08/2014



Zonal
Offices

The Chief Executive Officer,
[Kind Attention : Brig. Sh. Vishwanathan, ADG(Scty & Admn)]
Prasar Bharati, PTI Building,
New Delhi – 110001

East Zone
PO Box-2713
Kolkata
(W.B.)
700001

Subject : **Submission of Comments on Draft Transfer Policy as per PB order no. A-105-2012-PPC Dated 15/7/2014.**

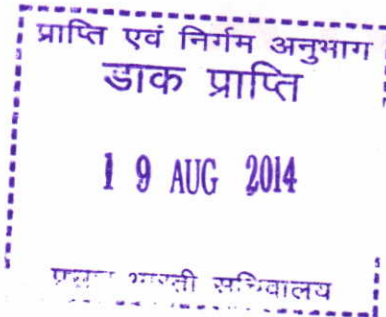
Respected Sir,

N.E.Zone
PO Box-83
Guwahati
(Assam)
781001

With warm regards this is in reference of PB order no. A-105-2012-PPC Dated 15/7/2014, we hereby submit our suggestions and comments for the same.

We request you to give due considerations to the issues raised in our representation as transfer Policy is a very sensitive aspect of our services. It is deeply related to our career and personal lives. Further we are still receiving suggestions from our Member and if required we will submit those as supplementary suggestions.

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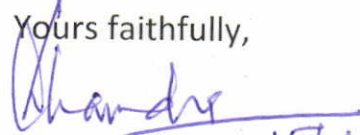


Thanking you,

South Zone
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enclosed the suggestions

Yours faithfully,


Umesh Chandra, 15/8/14
President, ARTEE
0-9871765714

umsharma01@yahoo.com


Umesh Chandra 15/8/14

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o/c

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General Observations

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(A). The Transfer Policy must have a human face and considerations while the some clauses of draft transfer policy spells otherwise. **Some of the clauses are harsh and implementation of such provisions will not help in smoothening the functioning of Stations** which is the prime purpose of the Policy.

(B). Since our Status is that We are Govt. Employees working in Prasar Bharati and our existing transfer Policy 1981 is approved by DOPT, Changes in the Policy **should be approved DOPT** after getting node of Prasar Bharati Board.

(C) It is mentioned in clause 1.2 of the draft transfer policy that It is applicable to **all Employees of Prasar Bharati** without any exception, whether they are on deemed deputation from Govt. of India or they are Prasar Bharati Employees. The Clause says that even the employees of deemed deputation are Prasar Bharati Employees while they belong to Govt.

As per our suggestions the Clause should be : **It is applicable to all Employees WORKING IN Prasar Bharati without any exception**, whether they are on deemed deputation from Govt. of India or they are Prasar Bharati Employees.

(D). The Transfer Policy should be implemented for transfer takes place after the date of implementation. For already transferred staff the existing provisions and tenures should be followed.

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Clause wise Suggestions

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- (1) **Clause 2.1 Tenure** : We are having three Categories of Stations A – yrs, B – 2 Yrs and C – 1 Yr. The present nomenclature of stations is fine and everyone is familiar with it. The Same nomenclature should continue.
- (2) **Clause 2.3** : The Clause is derogatory and it spoils the entire purpose of transfer policy. The clause is contradictory too. From last more than three decades our employees go on transfer with the attraction that they will be posted to their choice station after completion of tenure and difficult stations are being run smoothly because of this clause only. The clause surprisingly says that person should **NOT** be posted back to the same station / Kendra from where they were posted to the difficult station.

It means if a person is posted from Delhi to Leh or Kargil, he will not be brought back to any station in Delhi and Department will be at liberty to fetch him anywhere in India if the person is Gazetted Officer and anywhere in North Zone if the person is Non Gazetted Officer.

Guidelines issued by the Prasar Bharati Secretariat No A-10/40/2007PPC dated 21st May 2010, Point No. (vi) :

“Those Officers who complete their tenure at Difficult Stations should, as far as possible, be posted at their choice station/Kendra. For this, they will give three stations/Kendras of their choice, in order of preference.”

The very term “Difficult Station” suggests an atmosphere non-conducive to the normal discharge of duties and where the very life of the individual may be at risk. This difficulty may be in the form of terrorist activities(as in some parts of J&K and some NE states), communal clashes (ex: the town of Bhainsa in AP, though officially its not a Category-C station), internal insurgency or naxalism affected areas, lack of basic amenities like hospitals, schools etc (as in almost all Category-C stations), extreme climatic conditions that severely affect the health of the individual (Kodaikanal/Ooty/Madikeri), industrial activity leading to high pollution (eg: Yellandu, Kothagudem and Ramagundam, Markapuram, Sandur), extremely tiny villages where one cannot find even a tiny tea-shack (ex: the village of Madugula under DMC Hyderabad).

In such a situation, the hope that a person who opts for a tenure in a Difficult Station can get his/her choice place after completion of tenure acts as a very powerful inducement. It would be a prudent managerial practice to offer such a policy carrot to keep such stations running for without such inducement nobody will willingly go there. A large number of our staff have settled in large towns/cities, their age is 50+, they are suffering from medical problems and having college-going or marriageable-age children. By putting a condition that they cannot be posted back to the place from where they went to the Difficult Station is a retrograde step and will only discourage the staff from going to such stations.

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Ref : We must remember that staff are willing to sacrifice two years of their life in difficult conditions with the hope that their family and children will have good living conditions after the tenure. Date

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It is absolutely unacceptable and shall ruin our career prospects and entire purpose of Transfer Policy. It will also make the running of difficult stations very difficult as no body shall be willing to go to any difficult station. If it is implemented It shall have widespread repercussions and will be opposed at all levels through democratic procedures.

Our Submission is :

- On completion of Tenure at any normal four year tenure station person should be considered for choice posting,
- Should be given preference for choice posting on completion of two year tenure station.
- Choice Posting should be given to person completing tenure at One Year tenure most difficult stations.

In case of Most difficult stations it should be implemented strictly. If post does not exist the senior most person should be transferred to accommodate the person who has completed tenure at Most Difficult Station. However if no one has completed tenure at his choice station, the either he has to wait or has to give choice for another station.

(3). **2.3 Note 1** : Provision of exclusion of 15 days leaves in a year is very harsh and Leave eligible in an year should be included for the purpose of counting the tenure.

4) **2.4** About three Year Tenure Station : This 3 year tenure rule should not be applied to subordinate engineering staff at all. They are nowhere connected with either handling of money or any other work of sensitive nature. If they are willing to work for full normal tenure, they should be allowed to do so.

(5). **2.5 – Four year Tenure at New Station** : The clause is objectionable as it says – Tenure at all new station to be four year till it is decided.

Pl. take an example if a station is commissioned In North East / Leh etc in a very difficult City as per clause 2.5 the tenure shall be four years and everyone has to serve there for four years which is impractical.

So the tenure of New Station should be decided before posting the staff.

(6). **2.7 and 2.8** : The transfer should not be for the sake of transfers. Particularly in situation of acute staff shortage at stations It is not essential to Rotate Staff till the promotions. Also the limit of a maximum of two tenures should not be there.

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(6). We welcome Clause 4, 4.1, 4.2, 4.3 and Clause 5.

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(7). **Clause 6** : In addition to this the protection from transfer in case a physically challenged dependent made available as per Govt. orders issued time to time.

(8). **Clause 10.2** : The Person Completed tenure at Most Difficult Station should be exempted from giving three choices. In case If post does not exists the senior most person should be transferred to accommodate the person has competed tenure at Most Difficult Station. However if no one has completed tenure at his choice station, the either he has to wait or has to give another station.

(9). **Clause 10.9, 10.10, 10.11** : Clauses are OK for normal transfers but for Staff Completed tenure at difficult stations List should be released before completion of transfers.

(10). **Clause 10.12** : The clause is very harsh. An employee should be given a fair chance and time to represent against the transfer and should not be relived without considering the representation. At least One Month time should be give for this and before relieving from the duties.

(11). **Clause -10.16** : Long stay in a particular office/section by junior level officials should not be allowed. Stay beyond two tenures are not acceptable and be brought to the notice of the CEO Prasar Bharati. Competent authorities concerned (Regional Zonal office), must prepare a list of such officials and plan their postings in a fair manner.

Suggestion- Long stay by Junior level Engineering staff members does not affect the work of a particular office as they do not have any special powers and mostly they are involved in either operation or maintenance activities . Rather due to long stay their expertise in any particular field will improve the quality of programme production/ transmission in case of major Kendras. Again un-necessary transfer will involve huge financial burden on the Department.

(12). **Clause 10.23 : Age limit for High Altitude Stations** : The Age limit of 45 yrs has become impractical these days as the average age is around 50 in our departments. It should be extended to 55 yrs. Or should be left to the Individuals.

(13). **Clause 10.32 : Personal Issues** : In day to day affairs we take up issues like GPF transfers, Medical Bills and other issues on humanitarian ground which is the purpose of an Association since all employees cannot approach relevant sections in Directorate etc. So apart from transfer, pursuing other matters should be exempted from restrictions.

We suggest that transfer committees should be formed in Zones and in Directorates including representative of Recognized Association Concerned. It shall pave the way and Associations will not be required to take up individual cases.

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(13). **Clause 8.4 : Fourth Priority** : The person with three years of Retirement should not be so far disturb from his choice station as per DOPT Guidelines.

Zonal Offices

***** Additional Suggestions *****

(I). Vacancies available in each Cadre should be published on website periodically so that person may apply for transfer to the stations where vacancies exists.

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(II). Review of Categorization of Stations should be Once in two years, particularly in Terrorism and Insurgency effected Areas.

(III). Categorization of Class C/ Most difficult station should be district wise and all AIR/DD establishments under a particular Class C/ Most difficult district should come under the category. Example : Banswara in Rajasthan is a 2 yrs. difficult station but LPT Kushalgarh in same district is four year tenure station. Many of such examples are existing in setup.

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(IV). The Categorization of Stations should be similar for all. In Balaghat in MP is Naxallite affected area and difficult for AIR Program officials but not for Engineering.

(V). Transfer application of the staff should be forwarded to Competent Authority within one month from the date of application.

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(VI). During transferring of surplus staff from the station, their choice station should be taken.

(VII). Possibility of a process of counseling of the staff may be explored before transfer from normal tenure station, station wise probable vacancy list should published on website well in advance so that people may opt for transfer.

Zone wise Suggestions about Difficult Stations :

***** North Zone *****

**South Zone
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[1]. Due to Soft targets being Media Persons Srinagar and all insurgency effected Stations should continue to be one year tenure.

[2]. As per Guide lines of Ministry of Home Affairs all Stations in J & K are difficult. All Stations falling in Leh and Kargil should be One Year.

[3]. Most Difficult Stations in Rajasthan particularly in Border Areas should be One year.

[4]. Delhi is a state with its own assembly and Chief Minister/High Court. Delhi has more than 12 Stations of AIR/DD with maximum number of employees in any state across India hence different stations in Delhi should be treated as different Cities/ Stations in Delhi State .

[5]. The Cities of Abohar, Fazilka and Bhatinda have become cancer prone due to heavy pouring of Pesticides in the Soil. This is also mentioned in Reports of W.H.O. These Area is among the cities from where maximum numbers of Cancer Cases are being reported. It is requested that Stations falling in these Cities must be two year tenure stations.

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***** South Zone *****

Zonal Offices

East Zone
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- [1]. Stations like Ooty, Kodaikanal and Gulbarga are at present two years Tenure and it should be maintained.
- [2]. Kothagudem in particular and Khammam district in general, severely affected by Left wing extremist activities. Ministry of Home affairs acknowledged the same. Khammam district is one of the 26 districts in India, identified by Govt.of India, as severely affected by Left wing extremism (LWE).
- [3]. New difficult stations: There are several stations ought to be declared as difficult stations. For example: Kothagudem, Illendu, Sirpur, Bhainsa in Telangana state and Udhayagiri may be declared as a difficult station. Requests for new difficult stations may be considered, before framing the new transfer policy.

***** North East Zone *****

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- (1). In present policy DDK SHILLONG is a TWO YEARS TENURE DIFFICULT STATION it should be maintained.
- (2). We Demand that respective Special Concession and Service Benefits should be admissible for domiciles of these difficult areas.
- 4) According to **Annexure – I** of the draft transfer policy, 105 nos of Station enlisted as difficult station category 'A', Tenure 02 Yrs where some others stations of NEZ are to be included as follows
Bokhakhat, Haflong, Nagaon, Tezpur, Shillong, Jowai, Cherapunji, Sonari, Ambasa, Teliamura, Jolai bari, Dharmanagar, Dimapur, Goalpara, Gohopur, Bongaigaon, Satrasal, Dhubri, Tinsukia, Margerita, Miao, Kohima, Diphu, ,
- (5). We are proposing the names of following stations for considering as category 'B' stations:-1) Tawang, Willium nagar, Tuensang, Nongstoin, Mon, Lunglei, Saiha , Mokokchang, (Presently 'B' Category Station) and new inclusion Tezu, Ziro and Passighat.

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- (1). East Zone has suffered by un scientific bifurcation of erstwhile East Zone into EAST and NORTH EAST ZONE. Staff Members could not come back to their parent stations in EAST ZONE. Many of the difficult stations in North East Zone also suffered as they were being run by staff from East Zone by Rotation. In future such type of sensitive issues should be handled sensing the sensitivity of the issue.

Following Stations Missed from the list of Difficult:

Following Stations are difficult but not listed in list of Difficult Stations(02 yrs tenure):

- 01.UMORKOAT [DMC JEYPUR-ORISSA]
- 02.TUSHARA [DMC SAMBALPUR-ORISSA]
- 03.GOPALGANJ[DMC-MOTIHARI-BIHAR]

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Following Stations may be considered to declare difficult Station :

WEST BENGAL : KURSEONG, BAGMUNDI, KALIMPONG, DARJEELING, JHALDA, BALARAMPUR.

BIHAR : RAMNAGAR, AURANGABAD, DAUDNAGAR, SIWAN, SIMRI BHAKTIARPUR, MUNGER, NAWDA, PHULPARAS, SITAMARI.

JHARKHAND : DUMKA, GUMLA, LOHARDAGA, CHATRA, KODERMA

ORISSA : ALL Kalahandi , Bolangir, Koraput (KBK AREA), ALL JEYPUR DMC, BHAWANI PATNA DMC & BALANGIR]

(2). The Districts falling in Naxalite Effected Areas of Bihar, Jharkhand, West Bengal and Orissa must be declared difficult and all facilities as per Guide Lines of Hon'ble Ministry of Home Affairs should be extended to staff working in stations in these districts.

*** West Zone ***

Normally district is declared place as difficult like Chandrapur, Gadchiroli & Jagdalpur but practically the LPT's under these DMC's are 300 to 400 kms away in dense forest & most naxalite areas where police also think twice before joining. There was an Attack also on Jagdalpur HPT Doordarshan on 12th May 2013.

Staff of AIR & DD specially LPT's suffer a lot of problem at their stations & performing their duties with life threat. LPTs under DMC Chandrapur i.e. LPT Aheri, Bhamargarh, Sironcha DMC Jagdalpur i. e. Narayanpur, Konta. LPT Punendro Under HPT Bhuj, Rapar earthquake prone area under DMC Rajkot. Gujrat must be figured in the category of difficult stations.

We are submitting our suggestions with a request to give due considerations to the issues raised in our representation as transfer Policy is a very sensitive aspect of our services. It is deeply related to our career and families. Further We are still receiving suggestions from our Member and if required we will submit those as supplementary suggestions.

Thanking you,
Yours faithfully,


Umesh Chandra,

President, ARTEE

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Enclosed

[1]. List of Existing Difficult Stations.

[2]. Prasar Bharati Circular 2010 : Guidelines about transfer Policy.