



All India Graduate Engineers & Telecom Officers Association

Central Headquarter, New Delhi

(The Recognised Representative Association of BSNL)

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GS/AIGETOA/2020/132

Dated 25.11.2020

To,

**Shri Ravi Shankar Prasad Ji,
The Hon'ble Minister for Communications
Government of India, New Delhi-110001**

Subject: Consideration of the request of protecting the long term sustainability of BSNL by allowing it to upgrade its network for the launch of 4G services through existing proven technologies and at the same time process for development of indigenous 4G/5G technology should also be undertaken in parallel-regarding.

Respected Sir,

We introduce ourselves as All India Graduate Engineers & Telecom Officers Association (AIGETOA) consisting of executives of Bharat Sanchar Nigam Limited (BSNL). We happen to be the only Recognized Representative Association of Executives of BSNL by the management. **Sir, we take pride in submitting before your good self that we were the only major group in BSNL which has extended its unconditional support to the endeavors of government of India to revive this ailing PSU.** We are also thankful to Government for the major initiatives extended to BSNL for its revival like allotting the 4G spectrum through fresh equity infusion mode, funding of VRS Scheme for BSNL, extending the sovereign guarantee for raising the bonds from open market, permission for asset monetization, directing all the government owned departments, enterprises and institutions to opt for BSNL Services etc.

The result of these initiatives backed by the firm support and transparent implementation by DoT and BSNL management coupled with the herculean efforts of BSNL employees in these testing times is already visible in the form of BSNL turning EBIDTA positive this Year. We once again extend our deepest gratitude to the government for their firm initiatives to revive our beloved company. **We also welcome the idea of current initiative of Government of India to develop indigenous technologies as part of "Atma Nirbhar Bharat" in Telecom Field also but at the same time it is also felt that the same should not make BSNL obsolete and redundant due to absence of full-fledged 4G services for a very long period of time in the cut-throat competitive era.**

Sir, we wish to state that BSNL has suffered a lot due to delay in allotment of 4G spectrum for providing quality high-speed wireless data to the customers and other competitors had been gaining out of it. BSNL has been losing its customer base owing to the reason and its revenue has been depleting because of non-implementation of full-fledged 4G services across nation. This becomes further more significant in the current scenario, where high speed data has become new essential necessity and Work from Home for those in Job and Online Class for kids has become order of the day

in current pandemic period. **While all other Telecom Service Providers are capturing the potential market because of availability of 4G services but BSNL is forced to remain an outside player owing to its handicap of not having 4G services in its arsenal.**

We are thankful for government of India for extending the 4G Spectrum to BSNL through equity infusion mode. However, even after approval of 4G spectrum for BSNL, **the tender for procuring 4G equipment's for BSNL is unable to take shape. It is understood that Administrative Ministry is insisting for usage of Made in India 4G core. There is no company in India at present, which can provide Made in India core for 4G Technology. This whole technology needs to be developed indigenously and is definitely going to take minimum 1-2 years to ensure a firm and rugged technology in place and another few years after full-fledged rollout to ensure its efficacy and proven-ness in a go-live environment.** We don't deny the importance of the exercise of Atma Nirbhar Bharat but this is having very serious repercussions on the viability and long term sustainability of our beloved company BSNL due to absence of full-fledged 4G services across nation.

The development of Indian Core will definitely take time as first it has to go through a PoC phase and then after successful PoC, the rollout will happen and only after the complete roll-out, the proven-ness of the Indigenous core can be ascertained. **Till the time proven-ness of the technology is verified, BSNL 4G services will have an uncertain future which will have a big dent on the survival of the company as in the current scenario when Data has taken the shape of fuel, no Telecom Company can survive without providing full-fledged High Speed 4G data services.** Though, we wish that the indigenous technology in India must take shape but even in the remotest circumstances, in case, due to some reasons, PoC does not become successful, then BSNL may not be able to roll out its 4G services due to condition of procuring core equipment from Domestic Companies. Even if PoC is successful, the non-proven technology in go-live environment may face problems which can be known only when the Full-Fledged Roll out of the services takes place. This will put BSNL to a huge disadvantageous position vis-à-vis its competitors, in fact it's not only dis-advantageous but it has the potential to ruin the complete business for BSNL, which is an important strategic asset of the nation and needs to remain in running and vibrant mode, in case any inherent problems in the new technology occurs. **So, putting BSNL as a subject to a non-proven technology in this cut-throat competitive era will put a huge question mark on the viability of BSNL and future of its 65000 employees.**

Further, it is also understood that BSNL is being asked to procure 4G only core which will enforce the currently available 2G/3G services to be run as a separate network and hence will entail running two different and isolated networks in the same area which will result in degradation in quality of service, problems to the subscribers in the form of frequent handovers resulting into huge customer dissatisfaction, problems in compatibility of RAN equipment due to usage of separate resources from separate cores and above all huge cost escalation in the rollout of full-fledged 4G services. Adding to that there may be certain latent problems also which will occur only when we can use the services in a go-live environment. All these aspects needs to be given due consideration before enforcing such conditions on BSNL for rollout of its 4G services.

Currently, there is only one operator which is having 100 percent 4G service and all other operators including BSNL are providing 2G/3G/4G Services. Moreover, the percentage of towers envisaged by BSNL to be 4G enabled is not 100 percent and it will be mix of 2G/3G/4G sites. BSNL is currently having around 70% of customers as 2G. With such significant 2G subscriber base, it is impossible to migrate the complete service to 4G only network as substantial revenue of BSNL mobile service is coming from 2G customer base. Even 4G subscribers will need to have call and data services though 2G/3G network wherever 4G coverage of BSNL will not be available. **Hence running 2G/3G services along with 4G service is an absolute necessity for BSNL and we are of the considerate and firm opinion that new core should support 2G/3G along with 4G.**

In view of the above, we once again request that BSNL should not be made subject to an unproven technology for full-fledged rollout of the 4G services and instead should be allowed to roll-out its 4G services through existing proven technologies. **As a stop gap arrangement, BSNL should immediately be allowed to expand its 4G Service through existing network by upgrading its existing 4G compatible 50,000 BTSs to maximum possible extent, which were put in place by anticipating the allotment of 4G Spectrum to BSNL.** The Current 4G Equipment Tender should be dealt separately without linking it to the up-gradation. If some Policy Considerations are required to be waived off for this up-gradation, same may be permitted to BSNL for ensuring its viability.

However, at the same time, we understand and also support the significance of ATMA NIRBHAR BHARAT in the Telecom field which has an important strategic advantage not only for taking Indian Technologies to the next generation but also is critical for the security of our mother nation. Accordingly, we put forward the following suggestions with regard to the development of Indigenous Technology for providing 4G core and RAN equipment:

- 1. Instead of putting the complete rollout on hold, we request your good self that BSNL may be allowed to tender for procurement of equipment for 4G roll out by allowing all Vendors including MNCs & Indian Companies for its major locations through the use of existing proven technologies.** To encourage the idea of “Atma Nirbhar Bharat” and to felicitate the development of Indigenous 4G technologies, **some locations may be exclusively reserved for this exercise for ensuring the Proof of Concept (PoC) and Post successful PoC, the full-fledged rollout in these locations. If possible, separate Spectrum may be allotted for this purpose for establishing a full-fledged network in go-live mode which should run in Parallel to the current set-up, till the proven-ness of the indigenous system in Go-live environment is established.** This method will ensure flawless 4G rollout for BSNL also and at the same time it will serve the most important purpose of developing the indigenous technology along with ensuring its proven-ness. Indian Companies may be allowed extra advantages in the tender to help them in contributing maximum to the idea of “Atma Nirbhar Bharat”. **Once, the proven-ness of the technology is established which should be 5G enabled also, all Indian Telecom operators should be asked to use this indigenous technology for rollout of their 5G services by making this as a part of mandatory provisions for 5G Rollout.**
- 2. BSNL being part of this Atma Nirbhar Bharat exercise for ensuring Vocal for Local Scheme in Telecom Sector also shall be doing a huge service to our mother nation. This whole project of 4G**

deployment by local vendors definitely involves huge additional cost and accordingly we request that cost of this project should be funded by the government i.e. CAPEX as well as maintenance for next 5-10 years. **BSNL should not be asked to pay the price of this massive experiment which is going to write a new chapter for Indian Telecom era.**

3. A high powered committee consisting of eminent technologists from the telecom field should be constituted to monitor this exercise, as to develop the 4G/5G technology indigenously; a lot of efforts, skills and sound domain knowledge are required. **This group should be asked to develop a model which suits the best interests of BSNL (Both in terms of business as well as technology) along with ensuring the success of Make in India initiative for making India self-reliant in telecom field. A firm timeline of minimum duration should also be framed for the completion of PoC exercise** which will help in speedy execution of the whole project. The group should be directed to ensure that technology developed should be 2G/3G compatible also and the equipment developed should have high transmission power to ensure use of minimum number of BTSs in the network for cost viability of the Project as well as for ensuring the subscribers which remain on 2G/3G handsets (Specially those below the poverty-line) and do not get barred from availing mobile services.
4. Further, 2G mobile customers base of BSNL constitute about 70% of its total connections, the continuity of 2G service is essential and it will take time to migrate fully to 4G platform, once it is rolled out completely. In our Indian society, we have various sections of the citizens with different economic status and their requirement also needs to be taken care and so running of 2G services is still need of the hour for few more years at least. **Hence, it is also requested that the spectrum for 2G should be renewed and liberalized so as to enable BSNL to provide both 2G and 4G service on the same spectrum using Dynamic Spectrum Sharing making way for progressive migration of 2G customers to 4G.**
5. As after much effort of all the stake holders including Government, Management and its employees, the scenario for BSNL is now changing northwards and **after many years BSNL has turned EBIDTA positive once again.** Due to this delay in 4G rollout and non-implementation of network upgradation, BSNL is facing huge losses. **The loss faced by the BSNL due to this delay in service should be suitability compensated by the government from its exchequer.**
6. All the Central and State Government Departments, Institutions and PSUs **should be asked to mandatorily utilize BSNL mobile services** in line with the recent directive to use BSNL/MTNL lease line/landline/broadband to add revenue potential of BSNL.
7. **900 MHz band to be liberalized for BSNL for 2G/4G/5G services through renew of its license.** In the meanwhile, BSNL should also be allowed to simultaneously make itself ready for launch of 5G services by optimizing the use of spectrum in 900 MHz band and by putting in place a roadmap for putting a 5G network for BSNL with the usage of its most precious 900 MHz, 1800 MHz, 2100 MHz & 2600 MHz bands.
8. As BSNL has been involved completely in fulfilling the telecom objectives for government of India like Digital India, Vocal for Local, Atma Nirbhar Bharat etc BSNL as a government owned company

has been fully instrumental in supporting all the government initiatives including the social obligations of government without any profit motive and without any worry for the revenue. We the employees of BSNL have been lending extensive support to all these endeavors by shoulder to shoulder and by working day and night. We the employees of BSNL, has kept the telecom services up and running in the most crucial times for the nation. The bread and butter of around 65000 employees of BSNL are solely dependent upon the viability, survival and long term sustainability of the company. Involvement of BSNL in all these activities definitely puts a huge dent to its profitability which in turn affects the basic benefits of the employees also. **As Atma Nirbhar Bharat Showcase Model for the Nation, BSNL should be exempted from profitability clause and the company and its employees should be compensated irrespective of Profit/Loss theory. Accordingly we request your good self to consider all the benefits of employees of BSNL at par with other Grade-A CPSE including that of extending Standard Pay Scales, Superannuation Benefits, Career Progression and other benefits. We also request that BSNL should be exempted from the profitability clause and the 3rd PRC should be implemented in BSNL without linking it to the profitability of the company.** The losses faced by employees on account of non-profitability of BSNL should be compensated by the Government as we are the only telecom company involved in ensuring the objectives of government of India and its long term plans for the betterment of our beloved country.

We therefore request your kind self for considering the above suggestions for ensuring the long term viability of this important strategic asset of the nation and also to protect the livelihood of the 65000 employees who have dedicated themselves for attaining the aims and objectives for ensuring a vibrant and self-reliant India in Telecom Field.

With Warm Regards

Sincerely Yours

**[MD.WASI AHMAD]
General Secretary**

Copy to:

1. Shri Narendra Damodar Das Modi Ji, Hon'ble Prime Minister of India, North Block, New Delhi.
2. Shri Amitabh Kant, Hon'ble CEO NITI AAYOG, Yojna Bhawan, Sansad Marg, New Delhi.
3. Shri Anshu Prakash, Hon'ble Secretary, Dept of Telecom, Sanchar Bhawan, New Delhi.
4. Prof. K. VijayRaghavan, Chairperson ETG and Principal Scientific Advisor, Govt of India, N. Delhi
5. Shri K. Ramchand, Member (Technology), Dept of Telecom, Sanchar Bhawan, New Delhi.
6. Shri P. K. Sinha, Member (Finance), Dept of Telecom, Sanchar Bhawan, New Delhi.
7. Shri P. K. Purwar, CMD BSNL for kind information and N/A please.
8. Shri S. K. Mishra, Director (CM), BSNL Board for kind information and N/A please.
9. All other functional Directors, Dir (CFA)/Dir (HR)/Dir (Fin)/Dir (EB), BSNL Board for kind info pl.