



CC/TPR-POL/2017/1

4<sup>th</sup> December 2017

*Handwritten signature and date: 4/12/17*

**The Chairman**  
**Airports Authority of India**  
**Rajiv Gandhi Bhavan**  
**New Delhi- 110023.**

**Subject: Draft R&P Regulations – Comments thereof**

Sir,

It is once again emphasised that Efficiency, Effectiveness and Success of the organisation depend largely on the skills, abilities and commitment of the employees who constitute the most vital asset of the organisation.

Recruitment & Promotional Rule is a framework of policies which will enable the organisation to attract and retain the right talent with the ultimate objective of ensuring optimum and effective utilisation of the human resources in a climate of satisfaction, development & growth.

The R&P rules adopted in 2005 are contrary to this primary objective. AAI Management, Associations and Union have spent most of their invaluable times in only sorting out lot of issues arising out of the R&P rules. Many a time handling things under the pet word 'as a onetime measure' speaks indicates that this issue has not been properly handled.

There have been debates in the past whether the R&P rules will be a generic one or cadre specific. We feel it has to be cadre specific because the requirement for different disciplines especially in a job like Air Traffic Management has to be exclusive. Unless such steps are taken to protect the interests of this profession, lack of quality manpower, quality training etc. are destined to affect the safety of the airspace in future.

Famous theory of some are more equal than others is not applicable here in AAI and the claim of Management that it is a multi-disciplinary organization, all are equal cannot be a norm. Through R&P rules, an environment of mistrust and de-motivation for the personnel working in the ATM discipline has already been created, which is certainly dangerous to the organisation where safety is the core issue (its mission). It may be difficult to carry forward the mission statement because after adoption of the R&P and inconsistent policies, ATC has become the '**least sought after job**' in AAI.

Reference to the Communication Vide No A.600 L1/34/2016/HRPC/Part 1/ 451, Dated: 23<sup>rd</sup> Nov, 2017 seeking comments with justification in the proposed draft R & P Regulations. While we appreciate your efforts and interest in sharing the proposal and seeking comments from the stake holders, it could not be comprehended what compelled AAI Management to

*Handwritten initials: O/C*

from the stake holders, it could not be comprehended what compelled AAI Management to suddenly harp for new R & P Regulations when AAI despite being in business for more than three decade could not firm up the Recruitment & Promotional Policy for its cadre especially the executives and changing the existing R & P Regulations in a decade thus placing many aspirants in peril. It is unfortunate that AAI Management has not shared with us the necessity or compulsion they are faced with for changing the R & P Regulations

It shall be imperative for the organization to bear in mind while embarking on such sweeping changes in career progression that the basic principle of Career Progression and policy formulations shall not be lesser than that of what would have been their entitlement had they continued their services in erstwhile Civil Aviation Department for those employees who have been recruited by GOI under Ministry of Civil Aviation and still few more years of service left with in AAI.

The Cadre recruitment & revision, Promotional opportunities etc. have been altered more than twice during the past two decade resulting the core functionaries been relegated to the whims and fancies of the line functionaries of this organization. This is so unfortunate that as on date there is not a single core functionary in the major HR decision making environment nor the HR Directorate involves any core functionary in its important decision making functions.

Instead of formulating a better career progression than the existing one, HR has embarked on more rudimentary method of merely increasing the number of years of service requirement to become eligible for next higher grade. This is nothing but a retrograde move instead of progressive move. Mere change in nomenclature of some cadres such as Chief Manager instead of AGM, Deputy Manager instead of Assistant Manager and Assistant Manager instead of Junior Executive does not render any meaning to the cadre and it is not an appropriate Modern HR practice.

ATC Guild is surprised to see that once again an order and irrelevant approach has been initiated primarily to make some cosmetic changes to the existing R&P Regulations. Time and again, we have projected that due to the nature of the profession, suitable recruitment, retention and career progression schemes must be evolved to arrest the attrition as well as enhance safety in aircraft operation through experience and motivation. On perusal of this document, it appears prima facie that;

- Undesirable cosmetic changes have been made, for example, the introduction of designations like Dy. Manager and Chief Manager.
- The induction level has been proposed as Asstt. Manager, whereas the pay scale of Jr. Executives has been maintained. On several occasion, ATC guild has pleaded to raise the induction level so that quality candidates opt for this safety critical profession. To us, it does not make any sense to raise the induction level as Asstt. Manager while maintaining the pay scales of Jr. Executives.

- Everybody knows because of the lackadaisical approach of HR Directorate, regular recruitment has not taken place for the last two decades. This has resulted in bulk recruitments and the present proposed policy document has totally overlooked this aspect.
- Frequent changes to the criteria has got cascading effects primarily because ATCOs are performing a sovereign / state function and many related issues like Eligibility, Professional Rating, Security Requirement, Medical Standard etc. are gazette notified. In this context, we would like to draw the attention of competent authority that the qualification of an ATCO has changed frequently in the last 15 years, thereby giving everybody an impression that all sorts of adhoc arrangements are being made and there is total bankruptcy in ideas to have a durable policy, which is imperative for an organisation.
- Simple mathematical calculation based on the R&P provisions and the sanctioned strength in each cadre gives us an impression that a newly joined executive performing a sophisticated, safety critical job like air traffic control will be superannuating as Manager. The policy document has squarely failed to address this issue. Our proposal through letter no. CC/TPR-POL/2009/1, dated 07<sup>th</sup> February, 2009, and many more have been put on cold storage for which ATC Guild has repeatedly stated that this profession is the 'least sought after' profession in the market. We are sure that the proposed R&P Regulations does not in any way match the prevailing ones in other PSUs and thereby in future, we are destined to get "left overs" in the market.
- At the cost of reiteration, it is mentioned that vacancy based promotion is no more tenable in this organisation, especially, in ATM Discipline, due to irregular throughput and massive recruitments. Any policy makers would have vouched for time bound promotion in such situation rather than making cosmetic changes in the name of reforms.
- In a multi-disciplinary organisation, it may not be practical for the management to consider a discipline in a better way vis-à-vis other disciplines. Fact remains that Air Traffic Management having a bearing on safety and international obligations needs to be categorised differently because they are Certified Category of ATS personnel. We do not have an iota of doubt that considering the professional requirement and the recruitment, there has to be an exclusive R&P policy for ATM discipline. "All are equal" approach of management is destined to downgrade the quality of manpower and thereby quality of safety in the Indian Air Space.

Since the R & P rules and regulations are so important for every individual, the time provided for review and offering comments is very short and ***Guild shall seek more time to have in-depth analysis on every change that is being contemplated so that it becomes progressive.***

The following table would illustrate the difference in number of years of service enhanced in each cadre :

Cadre	Present years of service requirement	New recommended years of service requirement	Enhanced years of service requirement to be eligible for consideration to next grade	Remarks
E-1	Entry Level	Entry Qualification stated is B.E in any Discipline which is illogical as B.E (Bio-Technology), B.E (Chem.Eng) etc will not be of any use in ATC Profession. B.Sc (Phy) & B.Sc (Maths) that are preferred till now been discarded without any basis.		Nomenclature of the grade changed
<b>Note:</b> The requirement of Proficiency in English Language at Spoken & Written form equivalent to that of 10 + 2 level does not render required ELPA level catering for the profession as stipulated in the certification process.				
E-1 to E-2	3	3	0	Nomenclature of the grade changed
E-2 to E-3	3	4	1	75% Placement with fitment benefit.
<b>Note :</b> Balance 25% vacancies will be filled through Departmental Exam instead of DR which will only divide the workforce than render enhanced service potential. Ironically, a person joined at E-1 level should become eligible for E-3 Grade in six years of service in the present R&P regulations.				
E-3 to E-4	3	5	2	Departmental Promotion instead of DR is being proposed which will only divide the workforce than render enhanced service potential.
E-4 to E-5	3	4	1	Nomenclature of the grade changed
E-5 to E-6	2	5	3	At present collective service of 5 years with 2 ears service at E-5 level is in vogue.
<b>Note :</b> At present collective service of 5 years service at E-5 level is in vogue.				
E-6 to E-7	3	4	1	Proportionate ratio has been reduced from 2/3 (E-7) :1/3 (E-6) to 1/2 (E-7) :1/2 (E-6).
<b>Note :</b> Undue weightage for PAR which is highly irrelevant in its present format been given. Placement after 5 years from E-6 to E-7 scale also proposed for those who could not be promoted.				
E-7 to E-8	2	3	1	At present collective service of 5 years with 2 ears service at E-7 level is in vogue.
E-8 to E-9	5	3	-2	

Notwithstanding the above, ATC Guild submits the following for exhaustive discussion and necessary amendments to the R&P rules:

- a) The induction at three levels in the executive cadre, i.e. Junior Executive (E-1), Manager (E-3) and DGM (E-6), will be a major de-motivating factor among the executives because it will be entirely against the well-established policy of the PSUs and the Government, i.e. to provide genuine opportunities of promotion to all executives. **AAI should keep induction at one level only, either at JE (E-1) Level or at Manager Level (E-3).**
- b) The provision of induction at E-1 level and again at Manager level with same qualification does seem to be illogical and will definitely affect the efficiency because Junior Executives will also have a sense of dissatisfaction only on the background that they are also in possession of the same qualifications which is being possessed by the ATCOs inducted at the Manager level. It is definitely going to affect the efficiency of ATCOs.
- c) Considering the job requirement, it may not be possible to maintain the pyramidal structure of the ATCOs below supervisory level. There has to be gradation of ATCOs based on experience and the only solution feasible is Time Scale Promotion. **Further, recruitment en-masse has made the vacancy based promotions un-maintainable.**

ATC Guild (I) suggests the following defined promotion schemes based on length of service:

**(A) Induction level E-1**

***Time scale Promotion***

Induction level E-1

One year after joining training at CATC E-2

On completion of probation (3 Years) E-3

4 years after E-3 E-4

3 Years after E-4 E-5

***Scale of Pay in case of non-availability of posts***

5 years after E-5 E-6

5 Years after E-6 scale E-7

2/5 Years after E-7 E-8 (Promotion/Functional Scale)

**(B) Induction level E-3**

***Time scale Promotion***

Induction level E-3

On successful completion of training + 3 years of service E-4

***Scale of Pay in case of non-availability of posts***

3 Years after E-4 E-5

5 Years after E-5 E-6

5 Years after E-6 scale E-7

2/5 Years after E-7 scale E-8 (Promotion/Functional Scale)

**NOTE:** In case of change of induction level to E-3, the existing posts of E-1 and E-2 shall be upgraded to E-3 level.

d) The cadre of junior executive has been treated as E-1 level of executive cadre, where its basic scale Rs. 16400-3%-40500 is less than the NE-9 (Rs. 17000-3%-39500) and NE-10 scale (Rs.18500- 3%-40000 of non-executives. As a matter of principle, the pay scale of executives cannot be less than that of non-executives (Neither in lower nor in upper band). We have stated in the past that this is a violation of the DPE guidelines which AAI management has conveniently overlooked.

e) In the guise of multilevel induction in Executive cadre, AAI is contemplating to introduce new/higher qualification as eligibility criteria for promotion. The Guild disapproves such modus operandi as promotion is a reward commensurate with the executive's contribution towards the achievement of organisational goals & objectives. An executive who has contributed towards organisational goals for last 20 years and has earned two or three promotions cannot be declared ineligible as he doesn't have B.E. degree. Strategically, such eligibility criteria (Qualification) is affecting the ATC cadre seriously and almost blocking the promotions as there is wide variation in qualification in the past. If needed, such modalities like acquiring ICAO approved professional training, viz. Aerodrome Control, Approach Control, Area Control, Radar etc. being imparted at ATM training institutes, may be devised.

f) Induction level in E-3 & E-6 grade is not acceptable because it requires 2/10 years ATC experience respectively. In the market 5/10 years' experience in civil ATC are not available.

g) For promotions and departmental examination, induction level qualification shall not be insisted.

h) For ex-cadre posts, total length of service in the executive cadre shall be considered because of un-equal promotional opportunities in different disciplines.

i) Where Very Good is the benchmark for promotion, PAR grading 'Good' shall be communicated to the person concerned.

j). The provision of "absorptionist" is **not acceptable** as past experience indicates that such absorptionist gets inducted in AAI against in house vacancy through personal acquaintance with no separate qualification or credentials ultimately grab AAI post. Moreover, core function cannot have absorptionist and the line functionaries can if required be taken from in house through a proper repository of data about every executive who are highly qualified, knowledgeable and available in house.

k). Through Section 3.5 Sweeping Powers have been vested with Chairperson as follows “In exceptional circumstances and beyond delegation of powers, the chairperson may with the approval of Authority appoint an officer to an appropriate grade in the Executive or Non-Executive cadre in a temporary or in a substantive capacity as may be deemed fit in the interest of the Authority and fix his seniority in the grade after taking into account his continuous regular service in the analogous grade. Any such induction will be reported to the Board at the earliest”. This will be detrimental to the general category of employees who naively carryout their functions but ultimately lose genuine career progressive options **hence not acceptable**.

l). Similarly Section 4.4, the condition specified as “The candidate who has applied for a higher post or if he is in the Select Panel for a higher post can be appointed in a lower post subject to his suitability and willingness to accept the same” is again detrimental and ATC has already experienced once in such inhuman and ill-conceived decision, **hence not acceptable**.

m). In Section 16.1(b) there has been few PAR valuation weightage vested only for promotion in DGM & JGM cadre. In fact, para 16.1 (b), page 15 contradicts with para 19.3, page-18. Either such criteria **should be made applicable in every executive cadre or its cluster else should not have been applied**. Moreover, the present form of bench marking through PAR/ KPA measure is not in resonance with the nature of functions of core functionaries in ANS thus does not truly reflect the actual performance and potential of an individual.

There shall be only one entry level recruitment in ATC cadre as and every further career progression should start from there on the basis of experience and performance as prevalent in internationally for this cadre. There shall be no drive for recruiting at E3 cadre amongst the eligible departmental ATC cadre functionaries through any separate exam and other selection procedure.

n). Moreover, enhancement of eligibility criteria to become eligible for consideration of promotion to next higher cadre from present three years to four years is in some cadres and two years to three years in some cadres is detrimental to the interest employees who have been slogging for years **hence not acceptable**.

o). The formation of cluster with reduction in ratio between higher and lower designations of the same cluster in DGM/ JGM from  $33^{1/2} : 66^{1/2}$  to 50:50 **is not appropriate**. When there is no division or consideration of separate ratio in other clusters the rationale behind applying such criteria only in DGM/ JGM cluster is totally inappropriate. It goes against the basic premise of formation of clusters which is evident from the opening lines of Par 19'1 “ensuring regulated promotions and to avoid stagnation due to lack of adequate promotional avenues”. Para-21(iii) is thus uncalled for and should not have been considered. Apart from that, the imposition of condition of written test along with fulfillment of basic qualification for promotion to DGM is also alteration of service condition after one enters in to the service which is not appropriate. A person who joined with lesser qualification and served the organization for 20 to 25 years cannot acquire the

newly proposed requisite basic qualification which is an approved technical degree that cannot be acquired through correspondence/ distance education means. **Hence such illogical stipulations are totally unacceptable** and organization shall ensure timely and time bound promotion for the executives since all scales are assigned with equivalence in nomenclature of the cadre (such as Grade for ATCOs), time bound career progression can be resorted to in order to maintain motivation. To mitigate the stagnation of large number of executive at the level JGM in ATM discipline non-functional scale of E-8 can be introduced for those JGMs with 4 years of regular service and who could not be promoted due lack of vacancies.

p). Annexure-IV, Para-4. Point 'f', of Page-38 suggests for conduct of more than one DPC in case of sufficient candidates are not found to be available which would only delay the process and against the pre=amble of conduct of single DPC every year.

q). Para No: 31.1.10 conveys perhaps different meaning than that has been intended to be, the word "that" should be replaced with "previous concerned year".

r). Similarly, Para 31.1.11 is more of generic and does not convey clarity of thought. Any specific government rules should be incorporated at appropriate place while this new policy is being formulated instead of making generic savior clauses. Also, the annexures enclosed are pertaining to previous rulings which should have been incorporated appropriately at relevant places instead of tagging them thus conveying misleading information about the period of relevance (for instance Para 6(v) of Annexure-IV).

s). Also, Section VI, Para-35 on correct Interpretation of the rules and regulations of the R & P should ideally be an external authority and that authority should be specified in this rulings itself.

It is therefore prudent to consider humane and modern Human Resource Management Policies redefining the Job Definition, Job Specification and Job Description with avenues for more lateral and vertical growth prospects for the executives within the organization, instead of resorting to these misadventures that will only complicate and cause further disgruntlement amongst the workforce. In view of the above, it is urged to provide with more time to have a comprehensive study on the subject and suggest a progressive R&P regulations which cater to the job requirement and irregular throughput.

ATC Guild rejects the present form of the proposed policy. We are not averse to deliberate on the subject for a meaningful resolution.

With regards,



(D K Behera)  
General Secretary

**Copy to :**

1. Member (ANS)
2. Member (HR)

For kind perusal and necessary action.

2/6  
09/12/17