

<h1 style="margin: 0;">BSNL &amp; DOT PENSIONERS ASSOCIATION (INDIA)</h1>		
<p><b>Correspondence Address :</b> C-11, Suvarnadham, Avenue, Opp. Sundarvan, Ranip, Ahmedabad-382480.</p>	<p><b>CENTRAL HEADQUARTER, AHMEDABAD.</b> (Registered under Indian Trade Union Act 1926. Regn No. G-6456) (Affiliated to Bharat Pensioners Samaj, New Delhi) Central Telegraph Office Compound, Bhadra, Ahmedabad-380001.</p>	<p>Phone (O) 079-25500800 (R) 079-27521400 Cell: 9879090682 E-mail: didimistry@hotmail.com Web : www.bdpa.in</p>
<div style="border: 1px solid #0056b3; background-color: #0056b3; color: white; padding: 2px 5px; display: inline-block;"> <b>M. R. Vashist</b> President         </div>	<div style="border: 1px solid #0056b3; background-color: #0056b3; color: white; padding: 2px 5px; display: inline-block;"> <b>J. B. Kumpavat</b> Ex. President         </div>	<div style="border: 1px solid #0056b3; background-color: #0056b3; color: white; padding: 2px 5px; display: inline-block;"> <b>D.D. Mistry</b> General Secretary         </div>

No:BDPA(INDIA)/7<sup>th</sup> CPD/2015

Dated 21<sup>st</sup> December, 2015.

Dear Shri Makkar,

Please refer to your letter no 38/66/13-P&PW (A) (Vol.II) dated 1st/3rd December 2015 to the Pensioners' Associations, regarding their views on the 7th CPC report, in respect of Pension /retirement benefits. The said letter of yours though has not been received by us. But the undersigned has come to know about it through one of BPS affiliate on date i.e. 15.12.015. Accordingly undersigned submits BDPA (INDIA) views on the pension/retirement benefits as follows:

In continuation of representation vide No SG/BPS/10/2015 dtd.25-11.15 ( submitted by SG BPS) to the honorable Minister of Finance GOI following few points are put forth through DOP & PW for the consideration of Empowered Committee of Secretaries :

1. Fitment benefit (5.1.27)&{10.1.67(ii)} 2.57 Fitment factor has been recommended for uniform application to all employees & Pensioners arrived by dividing revised minimum pay by existing minimum salary .Minimum revised salary has been worked out on the principle of need base minimum wage following Dr Aykroyed formula of 50s which is out dated & smells of colonial mindset . The **"Normative Family"** is taken to consist of a spouse and two children below the age of 14yrs. (Husband 1 unit, wife 0.8 unit and children (2) at 0.6 units each). Considering wife to be .80 units is nothing but gender bias. In the present scenario a wife too put in the same amount of physical work rather may be more as compared to husband. She needs more nutrients to keep herself fit to be a mother & needs more clothing. A lady whether she is a wife of a labourer or a Secretary to Govt. of India has a basic right to keep her reasonably presentable for which she needs some minimum add-ons as such treating her to be less than a unit is gross injustice.

Similarly growing Children of less than 14 yrs need more of proteins, fats & carbohydrates, with sufficient exercise & field activities for healthy growth. Today they need much better & more clothing compared to 50s. Today Nation needs healthy & stout young citizens. It is against the national interest to restrict their need base minimum requirement to .6 units.

The basket of items taken does not take care of digital India's minimum requirement i.e. a smart mob phone & internet connection. The quantities of consumption & rates taken for the items in the basket are unrealistic compared to actual retail market rates.

In the light of above mentioned facts it is felt that minimum salary has been intentionally calculated to be lower to keep common fitment factor low. BDPA (INDIA) therefore, appeals that minimum revised salary be raised upwards to make it realistic.

According to 7th CPC recommendations, 2.57 fitment factors is for all employees and pensioners. But, in fact, 2.81 fitment has been given at Secretary Level by raising existing Salary of 80000/PM to 225000/ per month. This is robbing Peter to pay Paul, is violation of CPC own recommendation and that of Article 14 of the constitution of India. BDPA (INDIA), therefore, appeal that 2.81 fitment benefits be provided to all employee and Pensioners without any discrimination.

2. Minimum Pension/family pension (10.1.24)(10.1.26):As per 7th CPC recommendations revised minimum pension will be 50% of the minimum revised salary of Rs 18000/& Family pension will be 30% of it i.e. Minimum Pension will now be = Rs 9000/PM & family Pension = 5400/ So far minimum pension & Family pension have been the same i.e. Rs3500/ if existing minimum family Pension of Rs 3500/ is multiplied by 2.57 fitment benefit, it comes to Rs 8995/PM BPS request that the matter be looked into to ensure that minimum pension & family Pension remains the same.

3. Parity in Pension between pre & post seventh CPC retirees (10.1.53):

The pension formulation under Para 10.1.67(i) option 1 recommended by the Commission is that all past pensioners shall first be fixed in the Pay Matrix being recommended by it, on the basis of the Pay Band and Grade Pay at which they retired, at the minimum of the corresponding level in the matrix. This amount shall be raised, to arrive at the notional pay of the retiree, by adding the number of increments he had earned in the corresponding pay scale from which he had retired, at the rate of 3 per cent. Fifty per cent of the amount thus obtained would be the revised pension.

It would be seen that the Commission has recommended fixation of the revised pension of the past pensioners (without rectifying anomalies of 6th CPC), on the basis of the pay scale, after 31-12-2005/ Pay Band and Grade Pay from which they had retired and not on the basis of the revised pay of the post from which they had retired. The concept of full parity implies that it is the rank or post held by the pensioner which determines his pension and not the pay scale. In many cases the pay scales have been up-graded after the retirement of the pensioners as a result of Pay Commission's recommendations or otherwise without any change in the rank or in the nomenclature of the post held previously by them. Advantage of these upgraded pay scales was denied to those who retired earlier to such up gradation creating disparity in Pension.

The formulation proposed by the 7th CPC will not remove the existing disparity between the pension of the pre 01-01-2006 pensioners and those retiring after this date. Such a disparity will continue even after the implementation of the formulation recommended by the 7<sup>th</sup> CPC for the fixation of the pension of the past pensioners since their pension will be fixed

on the basis of the pay scale from which they had retired and the benefit of revised scale upgraded after their retirement will not be admissible to them.

The principle of full parity implies that the uniform pension should be paid to all pensioners retiring in the same rank with the same length of service, irrespective of the date of their retirement. Since the formulation recommended by the Seventh Pay Commission will not bring about uniformity in the pension of the past pensioners retiring in the same rank on different dates, 7th CPC recommendation thus will not ensure full parity for all civil pensioners.

Another glaring anomaly relating to pensioners in the new Pay Matrix which the Commission has proposed after dispensing with the existing system of Pay Bands and Grade Pay introduced on the recommendations of the Sixth Pay Commission. In the proposed Pay Matrix, in place of the existing Grade Pay, there are 18 distinct Pay Levels which would henceforth be status determiner. Each Level lays down the minimum pay, the annual pay progression of 3 per cent and the maximum pay. It is seen that the maximum pay in each Level exceeds the minimum pay in the next higher Level. This is likely to create a situation in which a person retiring from a higher Level will receive pension less than a person retiring from a lower Level. A situation may arise where a junior may draw more pension than a senior in the level above him. In another situation ( 10.1.71 ). A pensioner of Group “A” retired at last pay drawn of Rs4,000 on 31 January, 1989 under the IV CPC regime, having drawn 9 increments in the pay scale of Rs3000-100-3500-125-4500: will draw a pension of Rs. 44200 (Level 11) where as a promotee officer who retired from the same scale of pay On 31<sup>st</sup> March 1996 (prior to implementation of 5th CPC) at the same basic pay i.e. Rs 4000/- will draw a pension of Rs 34850/- because he could draw only one increment in level 11 giving rise to huge disparity.

BDPA (INDIA) appeals for the removal of the anomalies discussed above while taking a decision on the Commission’s recommendation.

4. Ratio between minimum and maximum: Instead of reducing it is raised which is against the preamble of the Constitution of Indian Republic. Issue may be revisited.

5. Raising Percentage of pension, based on sustenance L (10.1.24to27) Analysis given by CPC is silent on sustenance-this is unjustified rejection and may be reconsidered.

6. Additional pension at 75 years of age (10.1.28to 30) is denied only because Defense Ministry did not agree, this is rather absurd. If Defense Ministry does not want to have it, let them not have it. Why make others suffer on this account?

7. Medical facilities: (9.5.18 The Commission’s recommendations regarding merging of all postal dispensaries with CGHS dispensaries and inclusion of non CGHS covered postal Pensioners are welcome.

However, its recommendations regarding Health insurance for pensioners do not suit existing pensioners on account of no coverage of existing disease without lock-in period, no provision of OPD facility, payment of premium and less amount of coverage.

BDPA (INDIA), wish to draw your kind attention to Para 9.5.18 (iii) of the 7th CPC and request you to create without delay a combined entity of CGHS, ECHS-RELHS which in terms of 7th CPC would result in a very strong network of health facilities for the Central Government employees/Pensioners across the length and breadth of the country.

8. Fixed Medical Allowance (FMA) (8.1.51): It is granted to pensioners for meeting expenditure on day to day medical expenses that do not require hospitalization. Keeping in view the high cost of medicines & ever rising consultation fee of Doctors BDPA (INDIA) urge that the issue be revisited to reconsider the demand for raising FMA to Rs 2000/ PM.

With warm regards

Yours sincerely,

(D.D. MISTRY)  
General Secretary,  
BDPA (INDIA)

To:  
**Shri S.K.Makkar,**  
Under Secretary, GOI  
Ministry Of Personnel, PG & Pensions-DOP & PW  
3rd floor, Loknayak Bhawan, Khan Market.  
New Delhi-11014

Copy to:-

**Ms Vandana Sharma,** Joint Secretary. DOP & PW, New Delhi for necessary action at her level please.

(D.D. MISTRY)  
General Secretary,  
BDPA (INDIA)