

Dear Comrade Secretary General,

Please recall the brief discussion on 28th May 2011 at Guntur.

As requested by you I am sending the points to be taken up urgently in the interest of the cadre.

### **1. Monitoring Committee Meeting of CEx Commissionerates**

As you will remember this point has been raised consistently by our unit. First, in the meeting at Chennai held on 16th July 2010, when you and the President were the invitees. Two, during the AEC meeting held in Chennai on 23/24th September of 2010. We have always held the view that this MCM serves as a tool for harassment of our officers. The meeting is held in the presence of the Commissioner who hits out at Superintendents mercilessly without appreciating the difficulties involved in the conduct of Audit. All units of above Rs. 5 crores revenue are to be done by a team headed by the Addl. Commissioner and those above Rs.1 crore by Asst. Commissioner. But in reality no officer visits the unit and all work is done by Superintendents who also face the fury of the senior officers during MCM meeting. The MCM meeting is not required to be attended by Superintendents at all as an Addl. Commissioner is in overall charge of Audit. The Addl Commissioner has to conduct Group meetings with the Audit team and Range officer participating. Then another meeting will be held by the Commissioner which is to be attended by the Addl. Commissioner and Asst. Commissioners concerned. As such this MCM has turned into an exercise of harassment of Superintendents. All words that are unpalatable are being thrown at Superintendents. Added to this is the Director of Cost who has nothing to do with us in the Department hierarchy participating in such meetings and taking to task the Superintendents. I request you to take up this point urgently and restore the dignity of the Cadre.

### **2. ACES and the difficulties faced by our cadre**

As you are aware ACES work is done only by Superintendents in this Department which has a minimum of 10 Executive Ranks. About 15% of the assessee comply with online filing of returns and regarding the rest the RO's are required to get the particulars as also do a manual updation of the revenue. For a project like this a huge amount has been spent which has ended up troubling the Superintendent cadre alone. I request you to take up this point also, which in our view, is very urgent and necessary. In service tax about 30% of CENVAT revenue is going

unaccounted but the work done will be by us and looking forward it is likely to increase in the days to come. This will have an impact on the CR exercise currently underway as it will not correctly project the requirement of staff.

### **3. Status of LTU's and Stand alone Service Tax Commissionerates**

You may also be aware that the work load handled by all the six stand alone Service Tax Commissionerates is humongous. The numbers are mind-boggling and it is essential that the status of this as well as LTU's are fixed before the implementation of CR as otherwise it will create problems at the time of implementation of GST.

### **4. Suggestions regarding requirement of Uniform**

During the AEC meeting in Chennai [September 23/24th of 2010] a consensus was almost reached on the necessity to do away with uniform in pure Central Excise Commissionerates. But for the block created by two units the resolution would have been through and it was not put to vote for want of time during the deliberations. Now, the CBEC has sent a letter to all the formations on the type of Uniform to be worn. We may suggest that Uniform is not required in pure C.Ex. Commissionerates as well as Service Tax Commissionerates. We may look like clowns if uniform is continued post-implementation of GST.

### **5. Audit of Divisions/Ranges by CERA**

Beginning this Financial Year CERA is conducting either an Inspection or an Audit of the Ranges/ Divisions.

Request you to please study the background and fashion an appropriate response to the emerging situation.

With regards

R. Chandramouli

GS/Chennai Unit