
Minutes of AEO SAMVAD meeting with AEOs and CRMs- reg

From : Directorate of International Customs
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Fri, Jan 29, 2021 09:57 PM

 1 attachment

Subject : Minutes of AEO SAMVAD meeting with AEOs and CRMs-
reg

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Vinayak Azaad <import.acc@gov.in>

Respected Ma'am/Sir,

Please find enclosed the minutes of the AEO SAMVAD meeting with AEOs and CRMs held on 15.01.2021.

Regards,
Manudev Jain
Deputy Commissioner
DIC



 **Minutes of AEO SAMVAD Meeting with AEOs and CRMs.pdf**
404 KB

Minutes of AEO SAMVAD Meeting with AEOs and CRMs

15th January 2021

Chaired by: Ms. Arti Agarwal Srinivas, Principal Commissioner (DIC)

Details of Meeting: 12:00 to 12:50 PM IST [Meeting with AEOs & CRMs]
01:00 to 01:30 PM IST [Meeting with CRMs]

List of Participants:

1. Shri Nishith Goyal, Chief Commissioner, Patna (Invitee)
2. Shri M. K. Sarangi, Additional Commissioner, Mumbai-III
3. Shri Manish Kumar, Joint Commissioner, DIC
4. Shri Salik Parwaiz, Joint Commissioner, DIC
5. Shri Manudev Jain, Deputy Commissioner, DIC
6. Shri Y. K. Kanwaria, Assistant Commissioner, DIC
7. Shri Sanjay Kumar, Assistant Commissioner, DIC
8. Shri Rajkumar, Assistant Commissioner, DIC
9. Client Relationship Managers (CRMs) and AEOs from Ahmedabad, Bengaluru, Chennai, Cochin, Delhi, Mumbai-I, Mumbai-III, Pune, and Tiruchirappalli (list enclosed)

Agenda Points:

- a. Feedback from stakeholders (special focus on issues of AEOs)
- b. Discussion on special dispensation for MSME and outreach
- c. Discussion on pendency and issues faced by CRMs

Discussion:

1. Ms. Arti Agarwal Srinivas, Principal Commissioner, DIC welcomed all the AEO and other participants and elucidated the concept of the SAMVAD as a series of meetings to renew engagement with AEO partners. In her opening remarks, the Pr. Commissioner discussed the effects of the pandemic, and the efforts by the department to ease the burden of trade. She also emphasised the following:

- Wide circulation and publicity to MSME AEO Package as per the Circular 54/2020-Cus that deals with procedural simplification for accreditation of MSME AEO-T1 and AEO-T2 entities by customs zones via social media as well as print media to facilitate more MSMEs as Authorised Economic Operators.
- The significance of the trust reposed in the AEO entities and the importance of regular and effective cooperation between the customs and the trade for reinforcing the trust, and to bring their trusted B2B partners on board the AEO platform to create a network effect, so that customs can build on their trust.
- Crucial role of AEO- LO in urging all their business partners & clients to ensure requisite security so as to maintain the trusted relationship with the customs, and to bring them on board as AEO.
- Pr. Commissioner also stressed on the need to sensitize and hand-hold AEO applicants by respective CRMs to bring in more entities in the AEO fold. The chair also emphasised that all the issues pertaining to any zone may be shared with the respective CRMs with a copy to DIC for effective monitoring.

- Revamping the AEO program to make it more beneficial. Consideration by the Board for inclusion of benefits from the PGAs, with a request to the AEOs to convey any specific facilitation required from the PGAs as input for further consideration.

2. After the address by Principal Commissioner, DIC, Sh. Manish Kumar, Joint Commissioner, commenced the discussion on the agenda points with special focus on the issues of existing AEOs status holders. He also took up the issues and inputs from all the zones regarding the agenda points. The discussion is as under:

Ahmedabad Zone

2(i). Sh. Sanjay Singh, M/s Gujarat Flouro Chemicals Limited, informed that they are importing goods from Mundra/Hazira Port and highlighted the issue that the benefit of 24*7 customs clearance envisaged in Circular 33/2016 dated 22.07.2016 has not been extended to AEO entities practically due to non clearance of consignments on weekends or even beyond certain time on working days.

In this regard, DIC informed that the benefits envisaged for AEO entities must be extended to them at all Customs ports. DIC urged all CRMs to ensure that benefits due to AEOs as per their Tier should be extended to them & CRMs need to be vigilant in this regard. It was also agreed that DIC will share this concern with the jurisdictional Chief Commissioner for redressal of their grievance.

[Action: Zonal AEO Programme Manager, Ahmedabad]

Bangalore Zone

2(ii). Sh. Murali B N, Assistant Manager, M/s Kemwell Bio Pharma Pvt. Ltd., has suggested to extend additional benefits to AEO entities by partner government agencies (PGAs) and raised the issue of delay in out of charge clearance of consignment due to second check examination of goods.

In this regard, DIC informed that the issue regarding extension of additional benefits to AEO entities by PGAs is already under consideration of CBIC. Further, regarding delay in clearance of consignments due to second check/interdiction, it was informed that facilitation as AEO is not an open ended facilitation but it includes random checks to ensure continued compliance by AEOs, based on risk mitigation inputs of RMCC. Therefore, consignments of AEOs are subjected to second check examination.

Cochin Zone

2(iii). Sh. Sony Chacko, informed that they have applied for AEO-T2 earlier, as they fall under MSME category and want to apply under AEO-T2 (MSME) category and requested for guidance in the matter.

In this regard, DIC informed that they can request the zone through a letter/mail referring their application that the said application already filed may be treated and processed under the category of MSME AEO-T2, provided they comply with the requirements mentioned in Circular No. 54/2020. CRM Cochin was requested to take action to expedite the same.

[Action: Zonal AEO Programme Manager, Cochin]

Delhi Zone

2(iv). Sh. Mukesh Gupta, M/s LG Electronics Limited, raised the following queries:

- (a) Many a times benefits under CAROTAR, 2020 denied due to non-verification of Certificate of Origin and signature thereof as they are not timely updated.
- (b) Requirement for provision of Bank Guarantees to be implemented as per the extant AEO circular.
- (c) Cost and time taken for Direct to Port Delivery (DPD) clearance is more than that of normal/ICD clearance due to additional fee being charged by different operators.

In this regard, DIC informed that the issue regarding verification of Certificate of Origin and signature is being dealt by the International Customs Division (ICD) wing of CBIC and this issue will be flagged to CBIC

It was also informed that as AEO-T3, they are exempted from providing any Bank Guarantee (except seizure cases) and any alignment of this benefit with the recent CAROTAR provision will be taken by the DIC.

[Action: Directorate of International Customs]

Lastly, regarding the increased cost in Direct to Port Delivery (DPD) clearance of consignment as compared to ICD clearance pertaining to an AEO entity, the entity was requested to approach their jurisdictional AEO Programme Manager/ CRM. For Delhi zone, Sh. Aditya Yadav, DC/CRM, noted down the queries raised by Sh. Mukesh Gupta and assured for disposal of the same.

[Action: Zonal AEO Programme Manager, Delhi]

Mumbai Zone

2(v). Sh. Kiran, President, BCBA, Mumbai, raised the issue of timely disposal of renewal of AEO applications and query regarding continuance of AEO status in case of change of legal identity of the entity.

In this regard, DIC informed that for processing of AEO application a time limit has been prescribed and in almost all of the cases processing is being done within time limit. However due to Covid pandemic, certain issues have been faced by the AEO team for conducting the physical verification of premises to ascertain the safety and security parameters. In this context, it is advised to take up the matter with zonal AEO Programme Manager for timely disposal of application. As regard the issue of change of legal status of the entity due to name change of the entity, it was informed that whenever such changes occur the AEO status holder needs to intimate such changes to the zonal AEO Programme Manager and also needs to reapply for AEO accreditation in the name of the new legal entity with new PAN/IEC Number. The Circular No. 33/2016-Customs dated 22.07.2016 as amended already contains the above provisions and the same can be referred to for clarity.

2(vi). Sh. Dushyant Mulani, Representative of BCBA, raised the following issues: -

- (a). Time limit for processing of AEO applications,
- (b). Procedure in case of rejection of AEO applications and
- (c). Requirement of premise based audit by audit cell if AEO audit has already been done

In this regard, DIC informed that clear guidelines regarding time limit have been prescribed in the Circular No. 33/2016-Customs dated 22.07.2016 for processing of AEO application. It was also conveyed that any non-adherence to the time limit being faced by any entity may be brought to the knowledge of the zonal AEO Programme Manager with a copy to DIC.

If the application for grant of AEO status is rejected by the AEO Programme Manager due to non-fulfillment of certain criteria/deficiency, the applicant has the option to comply with the relevant criteria & remove any deficiency noticed. As and when the deficiency is removed and the entity has complied with the required criteria, the applicant can file a fresh application.

Regarding AEO onsite validation (audit), it was communicated that it is only to ascertain the compliance of safety and security parameters of the applicant whereas normal audit by audit cell of concerned Commissionerate is done to ascertain the overall compliance of the entity. Both are different so far as focus and scope of audit is concerned. The Principal Commissioner, DIC, stressed that AEO circular provides for review to be co-ordinated with onsite PCA to the extent possible and that the same is being followed by DIC.

[Action: All Zonal AEO Programme Managers]

2(vii). Sh. Shankar Shinde, Federation of Freight Forwarders' Associations in India (FFFI), Mumbai, raised the following queries:-

- (a) In case of AEO entities (for importer & exporter) no details are printed on Shipping Bills/ Bills of Entry.
- (b) For Customs Broker, the AEO status of Customs Broker has not been reflecting on Shipping Bills/ Bills of Entry.
- (c) Suggested for online submission of application for AEO - LO (CHA).

In this regard, DIC informed that ICES/ICEGATE has mapped the system with AEO and at the time of processing of Shipping Bill/Bill of Entry, the screen of the Assessing Officer shows whether the document has been filed by AEO entity.

Regarding the status of AEO Customs Broker not appearing on Shipping Bills/Bills of Entry, it is agreed that the same will be taken up with DG (Systems).

It was informed that at present the filing, processing and issuance of certification of AEO-T1 only is online and for AEO-T2/T3/LO online filing & processing of AEO application is under consideration.

[Action: Directorate of International Customs & Directorate General of Systems]

2(viii). Mr. Rahul, M/s BASF India Ltd., informed that they are importing in huge volume (100 tonnes). He raised the query whether any benefit available to AEO-T3 holder can be availed by AEO-T2 status holder and if the procedure for furnishing Bank Guarantee can be digitized.

In this regard, DIC informed that since AEO-T3 entities enjoy the highest level of facilitation as compared to AEO-T2, any eligible entity who wishes to avail the benefits available to AEO-T3 needs to apply for grant of status under the said category.

Further, regarding digitization of procedure for furnishing Bank Guarantee, the ICES has an existent module for Bonds and Bank Guarantees. However, a physical copy of Bond/BG has to be submitted as of now. For electronic repository, the matter can be taken up with Directorate General of Systems.

[Action: Directorate of International Customs & Directorate General of System]

Pune Zone

2(ix). Sh. Bibekananda Nayak, Assistant Commissioner/CRM, raised the following issues of M/s Ferrero India Private Limited: -

- (a). To extend additional benefits to AEO entities by partner government agencies (PGAs).
- (b). Issue related to IEC alert in the system on quarterly basis due to disposal of pendency of Advance EPCG license before various authorities.

In this regard, DIC informed that the issue regarding extension of additional benefits to AEO entities by PGAs is already under consideration. Further, as regard the issue related to IEC alert in the system, CRMs were requested to resolve the issued by taking up the same with Local System Manager/Section concerned.

[Action: All Customs Zones]

2(x). Sh. Balaji Musale, M/s Danfoss Power Solutions India Pvt Ltd., asked about the procedure to apply for AEO-T2.

In this regard, DIC informed about the process & Circular No. 33/2016-Customs dated 22.07.2016 available on website (<https://www.cbic.gov.in/resources//htdocs-cbec/customs/cs-circulars/cs-circulars-2016/circ33-2016cs-revised.pdf>) for his reference and applying with the requisite documents along with attached annexures to the jurisdictional Customs zone.

The session with AEOs & CRMs ended with a vote of thanks to all participants by Sh. Manish Kumar, Joint Commissioner, DIC.

Second Meeting [01:00 to 01:30 PM with CRMs]

3. The **second session** was a meeting exclusively with the Client Relationship Managers (CRMs) to discuss the pendency disposal and any difficulty being faced by them. The relevant discussions are as under:

(i) The meeting started with the initial discussion on the disposal of current pendency position of AEO-T1/T2/LO applications lying in the zones. The Principal Commissioner, DIC stressed that the Board has directed for early disposal of AEO-T1/T2/LO pendency. Further, noticing large number of pendency on account of deficiency memos, the respective Zonal AEO PM/Nodal Officer/CRMs were advised to take the initiative by proactively contacting the applicants to resolve the queries/deficiencies noticed and for expedited disposal of the pendency lying in the zones as early as possible.

[Action: All Customs Zone]

(ii) Further, the Principal Commissioner (DIC) also highlighted the scheduled launch of fortnight-long AEO drive from 18.01.2021 in each Commissionerate/zone to reduce the pendency of AEO-T1/T2/LO (including MSME) applications with special focus on pendency beyond the prescribed period/time limit for MSME i.e. 15 days for AEO T1 and 3 months for AEO T2. The chair also flagged the need for an outreach program via mela/drives in each zone for bringing maximum clients under the ambit of the AEO programme. The zones were informed that in case they need any assistance from DIC in the form of personnel/ resource the same will be provided.

[Action: All Customs Zone]

(iii) The CRMs were also informed that several AEOs were facing problems in Deferred Payment of Duty, and were marked as defaulters, as local holidays were not accounted for. The CRMs were advised to ensure that the System Managers immediately enter the local holidays in the ICES, so that there is no inadvertent 'default' in payment of duties recorded in the System, which could lead to withdrawal of the deferred payment facility for no fault of the AEOs.

[Action: All Customs Zone]

(iv) Shri Nishith Goyal, Chief Commissioner, Patna zone, raised the issue that for AEO, the Nodal Officer is in Patna whereas they received applications for AEO-T1/T-2/T-3/LO status mainly at Lucknow. Many a time applications are forwarded to jurisdictional office at Lucknow for further processing. However, thereafter no information regarding processing of file/issuance of certificate is received in their office i.e. the Nodal Officer/CRMs at Patna do not get to know the status of file processed at jurisdictional Lucknow office.

At the outset, the Chair welcomed the Chief Commissioner, Patna zone and informed that the verifying team/zone sends their report to the Nodal Officer, (who is located in the CCU) who after examination makes the recommendation to DIC. Once DIC receives the file along with recommendations (in case of AEO-T2/T-3/LO), the same is examined and certification is issued, if found in order. Further, DIC always informs the office from where it receives AEO recommendation. The Chief Commissioner, Patna concluded the discussion by saying that Patna will take up the matter with Lucknow office. DIC also committed that in case of Patna zone, on approval/issuance of AEO certificate, both verifying & recommending officer would be informed over mail.

(v) Sh. Anil Kumar Sapra, Deputy Commissioner/CRM from Delhi Customs enquired if an AEO-T2 entity applied for AEO-3 then blanket exemption for physical verification of premises cannot be permitted/allowed or if the matter can be looked into on case to case basis.

The Joint Commissioner, DIC informed that AEO-T3 is the highest level of accreditation, for which the highest level of compliance w.r.t. safety and security is required. Onsite validation is required in order to ascertain veracity of declarations, processes and infrastructures. Moreover, any addition/deletion in any compliance parameters of the entity can be noticed only at the time of physical verification of the premises. Hence, it is an important part to be fulfilled before accreditation as AEO-T3 and any exemption needs to be looked into after careful deliberations on merits, on case to case basis.

(vi) Sh. Bibekananda Nayak, Assistant Commissioner/CRM from Pune zone enquired if an AEO (LO) entity working as Customs Broker and applied for AEO certification for another category viz. Freight Forwarder, then what should be the treatment.

The Joint Commissioner, DIC informed that AEO-Logistic Operator (LO) is a broad heading of business/service provider which includes Freight Forwarder, Custodian/Terminal Operator, Customs House Agent and Warehouse Operator etc. as categories. Any entity involved in the international supply chain by doing Customs related work may apply for certification under single or multiple categories subject to the condition that the entity should have business activities for at least three financial years under both the categories and also have handled at least 25 documents for each of the activities during the last financial year. In other words, they must fulfill the basic eligibility criteria for becoming an AEO in that category.

He further asked if an existing AEO-T2 entity applied for AEO-T3 status and to fulfill the Business Partner Security criterion, for non-AEO partners the applicant submitted the documents/certificates from the business partners approved by US-CTPAT and other countries. In such case what should be done?

The Joint Commissioner, DIC informed that as AEO-T3 is the highest level of accreditation/facilitation under the programme which requires meeting of AEO equivalent security criteria to non-AEO partners as well, so the documents/certificates submitted by the applicant is to be verified based on their original AEO certification from foreign administration and the declaration by the entity in this regard. This can be done by visiting relevant sites of that country's AEO Programme or of WCO.

4. Sh. Manudev Jain, Deputy Commissioner, DIC informed the CRMs that in case of any queries they may contact the Nodal Officer/Zonal AEO Programme Manager or this office over mail. The meeting was concluded with a vote of thanks by Manish Kumar, Joint Commissioner, DIC.

NAME OF THE PARTICIPANTS FOR AEO-SAMVAD MEETING WITH CRMS AND AEOS			
S.NO.	ZONE	NAME OF THE OFFICER/ AEO REPRESENTATIVE	DESIGNATION
1	PATNA	NISHITH GOYAL	CHIEF COMMISSIONER
2	DIC	ARTI AGARWAL SRINIVAS	PRINCIPAL COMMISSIONER
3	MUMBAI III	M.K.SARANGI	ADDITIONAL COMMISSIONER
4	DIC	SALIK PARWAIZ	JOINT COMMISSIONER
5	DIC	MANISH KUMAR	JOINT COMMISSIONER
6	DIC	MANUDEV JAIN	DEPUTY COMMISSIONER
7	COCHIN	NIDHIN LAL.E.S	DEPUTY COMMISSIONER
8	TRICHY	M.Saravanakumar	DEPUTY COMMISSIONER
9	DELHI	Aditya Singh Yadav	DEPUTY COMMISSIONER
10	DELHI	PRADEEP KUMAR	DEPUTY COMMISSIONER
11	DELHI	ANIL KUMAR SAPRA	DEPUTY COMMISSIONER
12	DELHI	UTKARSHA	DEPUTY COMMISSIONER
13	DIC	Y.K.KANWARIA	ASSISTANT COMMISSIONER
14	DIC	RAJ KUMAR	ASSISTANT COMMISSIONER
15	DIC	SANJAY KUMAR	ASSISTANT COMMISSIONER
16	PUNE	Bibekananda Nayak	ASSISTANT COMMISSIONER
17	AEOs	Vikas Gattani	Ferrero India Private Limited
18	AEOs	Sachin Pawar	BRINTONS CARPETS ASIA PVT. LTD.
19	AEOs	Balaji Musale	Danfoss Power Solutions India Pvt Ltd.
20	AEOs	Kiran	President, BCBA
21	AEOs	Dushyant Malani	Manager, BCBA
22	AEOs	SHANKAR SHINDE	Chairman, FFFAI
23	AEOs	Anirudha Divekar	Sembcorp Energy India Limited
24	AEOs	M. JAYANTH N. VENKATRAM	Venkatrama International LLP
25	AEOs	Ramana	DECCAN FINE CHEMICALS (INDIA)PVT. LTD.
26	AEOs	Kulbir Singh	Euro Safety Footwear India Pvt. Ltd.
27	AEOs	Pradeep.K	Kerafibretex Intl. Pvt. Ltd.
28	AEOs	Suresh Kumar	The Travancore Mats & Matting Co
29	AEOs	RESHMI T R	Extraweave Pvt. Ltd
30	AEOs	Srikanth Kc	Tokai Rika Minda India Pvt. Ltd.
31	AEOs	Murali B N	M/s Kemwell Bio Pharma Pvt. Ltd.
32	AEOs	A.V. VIJAYAKUMAR	PARAMOUNT SHIPPING SERVICES PVT LTD
33	AEOs	K.V. RAJEEV	NAV BHARATH ENTERPRISES
34	AEOs	S. PRABHAKAR	KHIMJI POONJA FREIGHT FORWARDERS PVT LTD
35	AEOs	Balaji Keshav Musale	Danfoss Industries Pvt Ltd.

36	AEOs	Sanjay Singh	Gujarat Flouro Chemicals Ltd.
37	AEOs	Mr Murli Dhar Sharma	R L STEELS & ENERGY PRIVATE LIMITED
38	AEOs	DEVENDRA SINGH	CENTURY TEXTILES
39	AEOs	MUKESH GUPTA	LG ELECTRONICS INDIA LIMITED

NAME OF THE OFFICERS WHO ATTENDED AEO-SAMVAD MEETING WITH CRMS

S.NO.	ZONE	NAME OF THE OFFICERS	DESIGNATION
1	PATNA	NISHITH GOYAL	CHIEF COMMISSIONER
2	DIC	ARTI AGARWAL SRINIVAS	PRINCIPAL COMMISSIONER
3	MUMBAI III	M.K.SARANGI	ADDITIONAL COMMISSIONER
4	DIC	SALIK PARWAIZ	JOINT COMMISSIONER
5	DIC	MANISH KUMAR	JOINT COMMISSIONER
6	DIC	MANUDEV JAIN	DEPUTY COMMISSIONER
7	COCHIN	NIDHIN LAL.E.S	DEPUTY COMMISSIONER
8	TRICHY	M.Saravanakumar	DEPUTY COMMISSIONER
9	DELHI	Aditya Singh Yadav	DEPUTY COMMISSIONER
10	DELHI	PRADEEP KUMAR	DEPUTY COMMISSIONER
11	DELHI	ANIL KUMAR SAPRA	DEPUTY COMMISSIONER
12	DELHI	UTKARSHA	DEPUTY COMMISSIONER
13	DIC	Y.K.KANWARIA	ASSISTANT COMMISSIONER
14	DIC	RAJ KUMAR	ASSISTANT COMMISSIONER
15	DIC	SANJAY KUMAR	ASSISTANT COMMISSIONER
16	PUNE	Bibekananda Nayak	ASSISTANT COMMISSIONER

