

01.04.2019

Learned counsel for the appellant and Mr. Zia Ullah learned Deputy District Attorney for the respondents present.

Learned counsel for the appellant states that the grievance of the appellant has been redressed through order of respondent No.2 passed on 06.08.2018. He is therefore, under instruction to request for withdrawal of instant appeal.

Dismissed as withdrawn.



Member



Chairman

ANNOUNCED

01.04.2019

11.09.2018

Since 12th September 2018 has been declared as public holiday, by the Provincial Government on account of 1st Mukharram-ul-Haram, therefore the case is adjourned to 01.11.2018 for reply before S.B.


Chairman

01.11.2018

Due to retirement of Hon'ble Chairman, the Tribunal is defunct. Therefore, the case is adjourned. To come up on 20.12.2018.


READER


20.12.2018


Appellant in person present. Mr. Kabirullah Khattak learned Additional Advocate General alongwith Zia ur Rehman Superintendent representative of respondent department present and submitted written reply/comments. Adjourn. To come up for rejoinder if any and arguments on 15.02.2019 before D.B. -11


Member

15.02.2019

Appellant in person and Mr. Kabirullah Khattak learned Additional Advocate General alongwith Mr. Zia Ur Rehman Superintendent for the respondents present. Appellant requested for adjournment as his counsel is not in attendance. Adjourned. To come up for arguments on 01.04.2019 before D.B


(Hussain Shah)
Member





(Muhammad Amin Khan Kundi)
Member

Form -A

FORM OF ORDER SHEET

Court of _____

Case No. 915/2018

S.No.	Date of Order Proceedings	Order or other proceedings with signature of judge
1	2	3
1	19/07/2018 20-7-2018	<p>The appeal of Anwar Shad presented by Mr. Muhammad Zafar Tahirkheli Advocate may be entered in the Institution register and put up to the Wrothy Chairman for proper order please.</p> <p style="text-align: right;"> REGISTRAR</p> <p>The case is entrusted to S. Bench for preliminary hearing to be put up there on <u>30-7-2018</u></p> <p style="text-align: right;"> CHAIRMAN</p> <p>Appellant Mr. Anwar Shad in person alongwith his counsel Mr. Muhammad Zafar Khan Tahir Kheli, Advocate present and heard in limine.</p> <p>Contends that after forgoing his promotion, the requisite period for four years have not been matured but the respondents again promoted to him in utter violation of law.</p> <p>Points raised need consideration. The appeal is admitted to full hearing, subject to all legal objections. The appellant is directed to deposit security and process fee within 10 days. Thereafter, notices be issued to the respondents. To come up for written reply/comments on 12.09.2018 before S.B.</p> <p style="text-align: right;"> Chairman</p>
	30.07.2018	

Appellant Deposited
Security & Process Fee

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 915/2018

Anwar Shad

VERSUS

Govt of Khyber Pakhtunkhwa etc.

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I N D E X

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S.No	Particulars	Annexure	Dates	Pages
1	Memo of Petition			1-4
2	Application for interim relief			5
3	Departmental representation	"A"	10-04-2018	6-8
4	Show Cause Notice	"B"	14-06-2018	9-11
5	Service Appeal No.353/2014	"C"	-	12-13
6	Letter dated	"D"	19-03-2018	14-17
7	Vakalatnama			18

Date:- 19-07-2018


(Muhammad Zafar Tahirkheli)
Advocate


(Ansar Ullah Khan)
Advocate

)

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

Service Appeal No. 915 /2018

Khyber Pakhtunkhwa
Service Tribunal

Diary No. 1178

Dated 19/07/2018

Anwar Shad,
Senior Clerk (BPS-09),
Office of XEN C&W PBC Division-I,
Peshawar.

..... Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, through
Secretary Communication & Works Department, Peshawar
2. Chief Engineer (Centre), Communication & Works Department, Peshawar
3. Administrative Officer, Communication & Works Department, Peshawar

..... Respondents

=====

**SERVICE APPEAL U/S 4 OF KHYBER PAKHTUNKHWA SERVICE TRIBUNAL
ACT, 1974, WHEREBY THE DEPARTMENTAL REPRESENTATION OF THE
APPELLANT DATED 10-04-2018 (Annex-A), TO FOREGO HIS PROMOTION AS
ACCOUNTS CLERK AND TO RETAIN HIM AT PESHAWAR AS SENIOR CLERK WAS
IGNORED**

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"Prayer"

- (a) By accepting this appeal and directing the respondent department to drop the appellant's name from the list of candidates to be promoted to the post of Accounts Clerk and to retain him as Senior Clerk, as allowed vide rule-7(5) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989
- (b) directing the respondent department to accept the appellant's request to forego his promotion for the second time made through his departmental representation dated 10-04-2018 and further direct to set aside the impugned show cause notice dated 14-06-2018 communicated to the appellant on 19-06-2018, as reaction / reprisal to his departmental appeal (**Annex "B"**)

Filed to
Registrar
19/7/18

=====

Respectfully Sheweth,

1. The appellant is presently serving as Senior Clerk at the Office of XEN PBC Division-I, Peshawar.
2. The appellant is amongst senior most officials of the department in his cadre and was considered for promotion, which he declined vide departmental representation dated 19-09-2013.

- 2
3. That his request was declined by the department, whereby he was constrained to approach the Hon'ble Khyber Pakhtunkhwa Service Tribunal through service appeal No.353/2014 for redress of his grievance.
 4. That the service appeal was accepted vide order dated 11-09-2015, detailed as under:-

"Appellant with counsel and Mr. Abdul Rashid Tareen, Administrative Officer along with Mr. Usman Ghani, Sr.GP for respondents present. During the course of arguments, it was submitted on behalf of the respondent-department that the appellant has not yet been promoted from the post of Senior Clerk to the post of Accounts Clerk. It also revealed that presently Senior Clerks are placed in BPS-14 unlike Accounts Clerks who are still in BPS-09. According to Rule-7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, a Civil Servant is entitled to forego with his promotion. While concluding the discussion, this may be observed that presently no relief can be granted to the appellant. However, for the department guidance Rule-7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 may be cited. The appeal is disposed of accordingly. File be consigned to the record."

Announced
11-09-2015

-Sd-
Member

-Sd-
Member

(Copy annexed "C")

5. The appellant after the acceptance of the above mentioned service appeal has been serving the department on the same post till date.

That recently vide letter dated 19-03-2018, the appellant was asked to submit his ACRs/PERs, for placing the same before the DPC for his promotion to next higher scale. **(Copy annexed "D")**

6. That the appellant submitted his departmental appeal dated 10-04-2018, to forego his promotion for the second and final time, which was not taken into consideration and as a retaliatory measure served him with a show cause notice dated 14-06-2018, received on 19-06-2018. **(annex "B")**
7. That under the rules the appellant cannot be considered for promotion to next higher scale for a period of four years, following the judgment and order of this Hon'ble tribunal dated 11-09-2015.
8. That the Rule-7, sub-rule (5) of APT rules, 1989 is detailed as under:-

"(5) if on an order of promotion or before promotion any civil servant declines in writing, to accept promotion, such civil servant shall not be considered for such promotion for the next four years following the order:

Provided that if he declines to avail the benefit of promotion for the second time, then he shall stand superseded permanently for such promotion"

The judgment was passed on 11-09-2015 and the worthy authority is bound for a term of four years ending on 10-09-2019, for reconsidering him for promotion for the second time.

9. That the department has not only ignored the departmental appeal of the appellant, but has also taken departmental action against him through show cause notice dated 14-06-2018.

Feeling aggrieved and finding no other remedy, the appellant has been constrained to approach the Hon'ble Services Tribunal for the redress of his grievance, inter-alia on the following:

Grounds

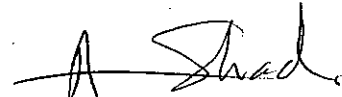
- (a) The respondent department has acted in a most arbitrary manner, while ignoring the departmental representation of the appellant without considering the material facts on record.
- (b) The department has ignored the fact that the appellant has voluntarily offered to forego his promotion to the next higher scale on 19-09-2013, which was accepted by the order of this Hon'ble tribunal dated 11-09-2015 in service Appeal No.353/2014.
- (c) The appellant's request to the worthy authority, to drop his name from the list of the suitable candidates eligible for promotion to next higher scale has not been taken into consideration and his departmental representation has been ignored, without giving any sound reason.
- (d) That under the rules, the appellant cannot be considered for promotion for four years till 2019, as Accounts Clerk. The show cause notice against the appellant is an arbitrary action, which needs to be set aside by the Worthy Tribunal.
- (e) The impugned omission and retaliatory action are thus both arbitrary, discriminatory, against the principles of equity, law, justice and propriety, subject to correction by this Hon'ble Tribunal.

Appellant seeks permission to take several other grounds at the time of arguments.

In view of the above,

- (a) By accepting this appeal the respondent department may be directed to drop the appellant's name from the list of candidates to be promoted to the post of Accounts Clerk and to retain him as Senior Clerk, as allowed vide rule-7(5) of Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989
- (b) Further directing the respondent department to accept the appellant's request to forego his promotion for the second time made through his departmental representation dated 10-04-2018 and to set aside the impugned show cause notice dated 14-06-2018 communicated to the appellant on 19-06-2018, as reaction / reprisal to his departmental appeal.

Any other relief deemed appropriate may also be granted


Appellant,

Through,

Peshawar, dated
19-07-2018


(Muhammad Zafar Tahirkheli)
Advocate


(Ansar Ullah Khan)
Advocate

5

BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTUNKHWA,
PESHAWAR

CM
in

Service Appeal No. _____ / 2018

Anwar Shad

VERSUS

Govt of Khyber Pakhtunkhwa etc.

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APPLICATION FOR INTERIM RELIEF

Respectfully Sheweth

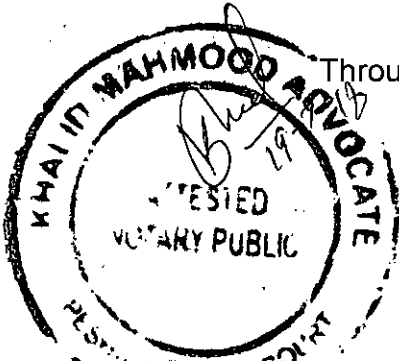
1. That the above titled appeal is being filed before this Hon'ble Tribunal, in which date of hearing is yet to be fixed.
2. That the contents of the accompanying appeal may kindly be read as part and parcel of the present appeal.
3. The appellant / Appellant has got a good prima facie case on merits and is sanguine about her success.
4. That the appellant/ applicant had requested to forego his promotion in accordance with the law, however, the department as a retaliatory measure has taken disciplinary action against him, while serving him with show cause notice.
5. It is the appellant/ applicant who will suffer irreparable harm if in case, his request is refused or any punitive action is taken against him.

In view of the above, it is humbly requested that the respondent department may kindly be restrained from taking any adverse action against the applicant.


Appellant,

Through,

Peshawar, dated
19-07-2018




(MUHAMMAD ZAFAR TAHIRKHELI)
Advocate

Affidavit

I, the Appellant/ applicant, stated on Oath that contents of the above petition are true and correct to the best of my knowledge and belief, and nothing has been kept concealed from this Hon'ble Tribunal.


DEPONENT

6

ANNEXURE

A

OFFICE OF THE EXECUTIVE ENGINEER
PROVINCIAL BUILDING (CONSTRUCTION)
DIVISION-I, C&W DEPTT: PESHAWAR.

Email. xen.divisinpeshawar2013@gmail.com

PH.No.091-9213248

Fax:091-9210092

No. 384-13-E

Dated 13/11/2018

To

The Chief Engineer (Centre)
Communication & Works Department
Khyber Pakhtunkhwa Peshawar.

Subject:- DEPARTMENTAL REPRESENTATION.

A Departmental Representation submitted by Mr.Anwar Shad Senior Clerk attached to this office which is self-explanatory on the subject is recommended for favour of favourable consideration please.

DA As above

EXECUTIVE ENGINEER

Copy to the:-

1. Superintending Engineer Provincial Building (Construction) Peshawar for information please.

EXECUTIVE ENGINEER

TRUE COPY

To,

The Chief Engineer (Centre),
Communication & Works Department,
Peshawar.

Through: Proper Channel.

DEPARTMENTAL REPRESENTATION

Respectfully Sheweth,

Anwar Shad, Senior Clerk Office of XEN PBC Division-I, Peshawar; the Petitioner submits most respectfully the following for your kind consideration and favour of acceptance:-

1. The Petitioner is presently serving as Senior Clerk at the Office of XEN PBC Division-I, Peshawar.
2. The petitioner is amongst senior most officials of the department in his cadre and was considered for promotion, which he declined vide departmental representation dated 19-09-2013.
3. That his request was declined by the department, whereby he was constrained to approach the Hon'ble Khyber Pakhtunkhwa Service Tribunal through service appeal No.353/2014 for redress of his grievance.
4. That the service appeal was accepted vide order dated 11-09-2015, detailed as under:-

"Appellant with counsel and Mr. Abdul Rashid Tareen, Administrative Officer, along with Mr. Usman Ghani, Sr.GP for respondents present. During the course of arguments, it was submitted on behalf of the respondent-department that the appellant has not yet been promoted from the post of Senior Clerk to the post of Accounts Clerk. It also revealed that presently Senior Clerks are placed in BPS-14 unlike Accounts Clerks who are still in BPS-09. According to Rule-7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, a Civil Servant is entitled to forego with his promotion. While concluding the discussion, this may be observed that presently no relief can be granted to the appellant. However, for the department guidance Rule-7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 may be cited. The appeal is disposed of accordingly. File be consigned to the record."

Announced
11-09-2015

-Sd-
Member

-Sd-
Member

5. The petitioner after the acceptance of the above mentioned service appeal has been serving the department on the same post till date.

TRUE COPY

- 9
6. That the petitioner has been asked to submit his ACRs/PERs, for placing the same before the DPC for his promotion to next higher scale.
 7. The petitioner requests the worthy authority to drop his name for the 2nd time from the list of the suitable candidates eligible for promotion to next higher scale. The petitioner would not claim his inter-se seniority in case he is denied promotion and would serve the department honestly and diligently to the utmost satisfaction of his superiors.
 8. That the Rule-7, sub-rule (5) of APT rules, 1989 is detailed as under:-

“(5) if on an order of promotion or before promotion any civil servant declines in writing, to accept promotion, such civil servant shall not be considered for such promotion for the next four years following the order:

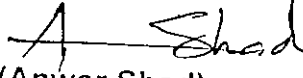
Provided that if he declines to avail the benefit of promotion for the second time, then he shall stand superseded permanently for such promotion”
 9. That under the rules the petitioner cannot be considered for promotion to next higher scale for a period of four years, following the order.

The judgment was passed on 11-09-2015 and the worthy authority is bound for a term of four years ending on 10-09-2019, for reconsidering him for promotion for the second time.
 10. That apart from above, the rules permit the petitioner to decline the benefit of promotion for the second time. The request of the petitioner is in accordance with the law, cited above, which merits acceptance.

In view of the above, the petitioner respectfully declines to avail the benefit of promotion for the second time and most humbly requests the worthy authority that, by accepting this representation, the petitioner may kindly be dropped from the list of the candidates to be promoted to the next higher scale.

Inconvenience caused, if any is very much regretted.

Dated: 10/04/2018


(Anwar Shad)
Senior Clerk
Office of XEN PBC
Division-I,
Peshawar

TRUE COPY



9

ANNEXURE

B

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR

No. 73-E / 101 / GEC / C&WD

Dated Peshawar the 14/06/2018

To

Received
on 19/6/2018

1. Mr. Anwar Shad, Senior Clerk O/O XEN PBC-I Peshawar.
2. Mr. Abdullah Jan, Senior Clerk O/O XEN C&W FATA Divn Orakzai Agency.
3. Mr. Kalim Javed, Senior Clerk O/O XEN C&W FATA Divn FR Tank/ FR DIKhan.
4. Mr. Muhammad Yunis Javed, Senior Clerk O/O XEN Building Divn DIKhan.
5. Mr. Shaukat Ali-I, Senior Clerk O/O XEN C&W Divn Haripur
6. Mr. Muhammad Nawab Khan, Senior Clerk O/O XEN C&W Divn Dir Upper.
7. Mr. Noor-Ud-Din, Senior Clerk O/O XEN C&W Divn Chitral.
8. Mr. Israr, Senior Clerk O/O XEN C&W Divn Chitral.
9. Mr. Fazal Maula-I Senior Clerk O/O XEN C&W Divn Shangla.
10. Mr. Ubaid Ullah Senior Clerk O/O XEN C&W Divn Chitral.
11. Mr. Muhammad Khurshid, Senior Clerk O/O XEN C&W Divn Hangu.
12. Mr. Muhammad Saeed, Senior Clerk O/O XEN C&W Division Karak
13. Mr. Mir Sharaf Khan, Senior Clerk O/O XEN Building FATA Divn Miranshahi.
14. Mr. Mushtaq Ahmad, Senior Clerk O/O XEN H/Way Divn Swat.
15. Mr. Javed Hamza, Senior Clerk O/O XEN Building Divn-II Peshawar.
16. Mr. Mir-Ud-Din, Senior Clerk O/O XEN C&W Divn Chitral.
17. Mr. Amanullah, Senior Clerk O/O XEN C&W Divn Shangla.
18. Mr. Asad Jan, Senior Clerk O/O XEN Building Divn-I Peshawar.
19. Mr. Gul Nawaz, Senior Clerk O/O XEN C&W Divn Haripur.
20. Mr. Muhammad Aslam-III, Senior Clerk O/O XEN C&W Divn Haripur.
21. Mr. Muhammad Hafeez, Senior Clerk O/O XEN C&W Divn Hangu
22. Mr. Shaukat Ali-II, Senior Clerk O/O XEN Building Divn-II Peshawar.
23. Mr. Zahid Iqbal, Senior Clerk O/O SE C&W Circle Abbottabad.
24. Mr. Zahoor-ul-Haq, Senior Clerk O/O XEN C&W Divn Shangla.
25. Mr. Muhammad Amjid Khan, Senior Clerk O/O XEN C&W Divn Abbottabad.
26. Malik Muhammad Fayaz, Senior Clerk O/O XEN C&W Divn Mansehra,
27. Mr. Muhammad Ikram, Senior Clerk O/O XEN FATA Divn FR Kohat/ FR Peshawar.
28. Mr. Irshad Hussain, Senior Clerk O/O XEN Highway Divn Peshawar
29. Mr. Khurshid Ali-I, Senior Clerk O/O XEN Building Divn Swat.
30. Mr. Wisal Muhammad, Senior Clerk O/O XEN C&W Divn Battagram.
31. Mr. Gran Muhammad, Senior Clerk O/O XEN C&W Divn Malakand.
32. Mr. Bismillah Khan, Senior Clerk O/O XEN H/W FATA Divn Miranshahi
33. Mr. Habibullah, Senior Clerk O/O XEN Building Divn-II Peshawar.

SUBJECT SHOW CAUSE NOTICE

A Show Cause Notice regarding your serious acts/omissions/ mis-conduct, is enclosed herewith / served upon you.

Your reply to the said Show Cause Notice shall reach the undersigned within 07-days of its receipt. In-case of non-compliance, it will be presumed that you have no defence to make and in the case, ex-parte action will be taken accordingly.

DA/As above:

Copy forwarded to the :-

- 1) Chief Engineer (North) C&W Department Peshawar.
- 2) Chief Engineer (East) C&W Department Abbottabad.
- 3) Chief Engineer (FATA) W&S Department Peshawar alongwith show cause notice for further necessary action at his end.
- 4) All Superintending Engineers (Concerned)
- 5) All Executive Engineers (Concerned). A copy of show cause notice is enclosed herewith for further necessary action.

DA/As above
For Sl.No.54.3

TRUE COPY

CHIEF ENGINEER (CENTRE)

SHOW CAUSE NOTICE

I, Engr. Muhammad Ayub Chief Engineer (Centre) C&W Department Peshawar, Khyber Pakhtunkhwa as Competent Authority, under the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules 2011, do hereby serve you:-

1. Mr. Anwar Shad, Senior Clerk O/O XEN PBC-I Peshawar.
2. Mr. Abdullah Jan, Senior Clerk O/O XEN C&W FATA Divn Orakzai Agency.
3. Mr. Kalim Javed, Senior Clerk O/O XEN C&W FATA Divn FR Tank/ FR DIKhan.
4. Mr. Muhammad Yunis Javed, Senior Clerk O/O XEN Building Divn DIKhan.
5. Mr. Shaukat Ali-I, Senior Clerk O/O XEN C&W Divn Haripur.
6. Mr. Muhammad Nawab Khan, Senior Clerk O/O XEN C&W Divn Dir Upper.
7. Mr. Noor-Ud-Din, Senior Clerk O/O XEN C&W Divn Chitral.
8. Mr. Israr, Senior Clerk O/O XEN C&W Divn Chitral.
9. Mr. Fazal Maula-I Senior Clerk O/O XEN C&W Divn Shangla.
10. Mr. Ubaid Ullah Senior Clerk O/O XEN C&W Divn Chitral.
11. Mr. Muhammad Khurshid, Senior Clerk O/O XEN C&W Divn Hangu.
12. Mr. Muhammad Saeed, Senior Clerk O/O XEN C&W Division Karak.
13. Mr. Mir Sharaf Khan, Senior Clerk O/O XEN Building FATA Divn Miranshah.
14. Mr. Mushtaq Ahmad, Senior Clerk O/O XEN H/Way Divn Swat.
15. Mr. Javed Hamza, Senior Clerk O/O XEN Building Divn-II Peshawar.
16. Mr. Mir-Ud-Din, Senior Clerk O/O XEN C&W Divn Chitral.
17. Mr. Amanullah, Senior Clerk O/O XEN C&W Divn Shangla.
18. Mr. Asad Jan, Senior Clerk O/O XEN Building Divn-I Peshawar.
19. Mr. Gul Nawaz, Senior Clerk O/O XEN C&W Divn Haripur.
20. Mr. Muhammad Aslam-III, Senior Clerk O/O XEN C&W Divn Haripur.
21. Mr. Muhammad Hafeez, Senior Clerk O/O XEN C&W Divn Hangu.
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23. Mr. Zahid Iqbal, Senior Clerk O/O SE C&W Circle Abbottabad.
24. Mr. Zahoor-ul-Haq, Senior Clerk O/O XEN C&W Divn Shangla.
25. Mr. Muhammad Amjid Khan, Senior Clerk O/O XEN C&W Divn Abbottabad.
26. Malik Muhammad Fayaz, Senior Clerk O/O XEN C&W Divn Mansehra.
27. Mr. Muhammad Ikram, Senior Clerk O/O XEN FATA Divn FR Kohat/ FR Peshawar.
28. Mr. Irshad Hussain, Senior Clerk O/O XEN Highway Divn Peshawar.
29. Mr. Khurshid Ali-I, Senior Clerk O/O XEN Building Divn Swat.
30. Mr. Wisal Muhammad, Senior Clerk O/O XEN C&W Divn Battagram.
31. Mr. Gran Muhammad, Senior Clerk O/O XEN C&W Divn Malakand.
32. Mr. Bismillah Khan, Senior Clerk O/O XEN H/W FATA Divn Miranshah.
33. Mr. Habibullah, Senior Clerk O/O XEN Building Divn-II Peshawar.

as follows:-

1. That you were directed vide this office memo No.177-E/2201/CEC/C&WD dated 06/02/2018 and reminder No. 177-E/2682/CEC/C&WD dated 19/03/2018 as well as various telephonic messages conveyed with regard to providing of your ACRs for promotion case as Accounts Clerk, but you failed to comply the orders of the undersigned. Thus you have made yourself liable for disciplinary action under (Efficiency & Disciplinary) Rules, 2011
2. In terms of Rule-5 of Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules-2011, I, as Competent Authority, serve you with a show cause notice under Rule-7 of the ibid Rules.
3. As a result thereof, I, as competent authority, have tentatively decided to impose upon you the following penalty under Rule-4 of the Khyber Pakhtunkhwa Government Servants (Efficiency & Discipline) Rules, 2011: -

i. Reduction to lower post

ii. _____

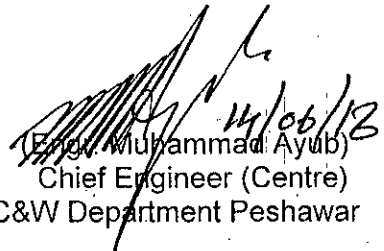
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4. You are therefore, required to show cause as to why the aforesaid penalty / penalties should not be imposed upon you and also intimate whether you desire to be heard in person.

5. If no reply to this notice is received within seven (07) days or not more than of fifteen (15) days of its delivery, it shall be presumed that you have no defence to put in, and in that case an ex-parte action shall be taken against you.


(Eng. Muhammad Ayub)
Chief Engineer (Centre)
C&W Department Peshawar

TRUE COPY

**BEFORE THE SERVICE TRIBUNAL, KHYBER PAKHTOONKHWA
PESHAWAR**

Service Appeal No. 353 2014

Anwar Shad,
Senior Clerk (BPS-09) / SDA,
Office of XEN C&W PBC Division-I,
Peshawar.



Appellant

VERSUS

1. Government of Khyber Pakhtunkhwa, through
Secretary Communication & Works Department, Peshawar
2. Chief Engineer (Centre), Communication & Works Department, Peshawar
3. Administrative Officer, Communication & Works Department, Peshawar

..... Respondents

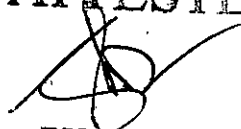
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**SERVICE APPEAL U/S 4 OF NWFP SERVICE TRIBUNAL ACT, 1974, WHEREBY THE
DEPARTMENTAL REPRESENTATION OF THE APPELLANT DATED 19-09-2013
(Annex-A), TO RETAIN HIM AT PESHAWAR AS SENIOR CLERK WAS
REJECTED/FILED & COMMUNICATED ON DATED 10-03-2014 (Annex-B)**

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"Prayer"

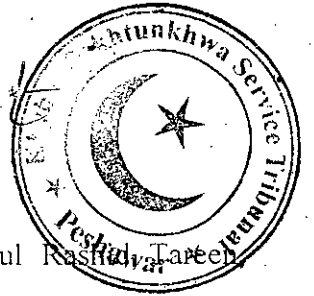
ATTESTED


EXAMINER
Khyber Pakhtunkhwa
Service Tribunal,
Peshawar

- (a) By accepting this appeal and setting aside the impugned rejection order, communicated to the appellant on 10-03-2014 (annex "B") whereby the appellant's appeal dated 19-09-2013 (annex "A") was refused, and
- (b) directing the respondent department to retain the appellant at Peshawar due to security reasons and threat to his life and to contest the criminal case pending against him before the court of competent jurisdiction.

Respectfully Sheweth,

1. The appellant is presently serving as Senior Clerk / S.D.A at the Office of XEN PBC Division-I, Works and Services Department Peshawar. The appellant is amongst senior most officials of the department in his cadre and is due for promotion to next higher scale.
2. That a false case under section 302/34 PPC vide F.I.R No. 405 dated 11-10-2011 was lodged against the appellant at P.S University Town, whereby the Hon'ble Peshawar High Court Peshawar, vide judgment and order dated 13-08-2012 in Cr. M No. 1039-P/2012 has granted bail to the appellant. (Copies annexed "C" & "C1")
3. That due to the above mentioned false and frivolous criminal case, the petitioner is facing serious security problems due to animosity with the opponent party. In the given circumstances, it is very difficult for him to move freely from one place to another and permanently settle away from his present residence.



11.09.2015

Appellant with counsel and Mr. Abdul Rashid, Tareen

Administrative Officer alongwith Mr. Usman Ghani, Sr.GP for respondents present. During the course of arguments, it was submitted on behalf of the respondent-department that the appellant has not yet been promoted from the post of Senior Clerk to the post of Accounts Clerk. It also revealed that presently Senior Clerks are placed in BPS-14 unlike Accounts Clerks who are still in BPS-9. According to Rule -7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, a Civil Servant is entitled to forego with his promotion. While concluding the discussion, this may be observed that presently no relief can be granted to the appellant. However for the department guidance Rule -7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 may be cited. The appeal is disposed of accordingly. The file is consigned to the record.

Certified to be true copy
 MEMBER
 Khyber Pakhtunkhwa
 Service Tribunal,
 Peshawar

Approved
11.09.2015

Member

Member

Date of Presentation of Application 13-7-18
 Number of Volumes 800
 Copying Fee 600
 Urgency
 Total 600
 Name of Copyists
 Date of Completion of Copying 17-7-18
 Date of Delivery of Copy 17-7-18

149

ANNEXURE 1

Reminder 1st
Most Immediate

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PAKHTUNKHWA PESHAWAR
No. 177-E / 2682 / CEC / C&WD
Dated Peshawar the 19 / 03 / 2018

To

1. All Chief Engineer
In C&W Department Khyber Pakhtunkhwa
2. The Chief Engineer (FATA)
W&S Department Peshawar
3. The Managing Director
PKHA Peshawar
4. All Superintending Engineers
In C&W Department Khyber Pakhtunkhwa i/c FATA
5. Superintending Engineer
PBMC C&WD Peshawar
6. All Executive Engineers
In C&W Department Khyber Pakhtunkhwa i/c FATA
7. Executive Engineer
PBMC C&WD Peshawar
8. Project Director
FMR/ PMU C&W Deptt Peshawar
9. Project Director
PaRRSA/USAID Unit at Saidu Sharif Swat
10. Assistant Research Officers
RR&MT, Laboratory C&W Circle Kohat / Hayatabad

YBCI

XEN PBC DIVISION 1 PESHAWAR	
Dairy No	<u>6080/3-E</u>
Date	<u>22-03-2018</u>

Subject: - INTIMATION OF VACANT POSTS & SUPPLY/ PROVISION OF ANNUAL CONFIDENTIAL REPORTS (COMPLETE) AND NON-INVOLVEMENT CERTIFICATE / SYNOPSIS

Your most immediate attention is invited to this office memo No.177-E/2201/CEC/C&WD dated 06/02/2018, whereby you were directed to submit: -

(1) The vacant position of Accounts Clerks in your respective offices may be intimated, AND

(2) Annual Confidential Reports/ Non-Involvement Certificates/ Synopsis in respect of the following Senior Clerks working under your jurisdiction may also be provided, but no positive response has been observed yet.

It is therefore once again directed that this may be assigned Top Most Priority please.

TRUE COPY

All SDAs /
DAO
got napp;

Sl. No.	Name of Official	Father's Name
1.	Mr. Anwar Shad	Gul Shad
2.	Mr. Mohammad Amin	Sardar

Yuc.

15

Sl. No.	Name of Official	Father's Name
3.	Mr. Abdullah Jan-I	Qasim Jan
4.	Mr. Kalim Javed	Muhammad Alam
5.	Mr. Awal Sher	Qadar Sher
6.	Mr. Pervez Akhtar	Abdul Ghafoor
7.	Mr. Ihsan Gul	Subhan Gul
8.	Mr. Waris Khan	Akbar Khan
9.	Mr. Muhammad Ayub Shah	Noor Hasham Shah
10.	Mr. Azizur Rehman-I	Abdul Sattar
11.	Mr. Mohsin Shah	Mian Syed
12.	Mr. Dilawar Khan-I	Mohammad Farooq
13.	Mr. Mohammad Tariq	Abdullah Jan
14.	Mr. Gul Hassan	Gharib Hassan
15.	Mr. Muhammad Mushtaq-I	Mohammad Anwar
16.	Mr. Muhammad Ayaz-I	Rab Nawaz
17.	Mr. Shaukat Ali-I	Qalandar Khan
18.	Mr. Tanveer Ahmad Siddiqui	Sher Ahmad Siddiqui
19.	Mr. Jehangir Akhtar	Inayatullah
20.	Mr. Ali Janan	Baz Ali
21.	Mr. Shamsuddin-II	Mian Gul Sherin
22.	Mr. Muhammad Ayub-I	Mohammad Khan
23.	Mr. Mohammad Nawab Khan	Mohammad Karim
24.	Mr. Fazle Ahmad	Abdul Khaliq
25.	Mr. Abid Anwar	Amal Badshah
26.	Mr. Wahidullah	Fazal Rahman
27.	Mr. Noor-Ud-Din	Wali Khan
28.	Mr. Israr	Izatman Shah
29.	Mr. Fazal Maula-I	Khanadan
30.	Mr. Hazrat Yousaf	Nazimuddin
31.	Mr. Zulfiqar Ali	Misal Khan
32.	Mr. Liaqat Ali-I	Sohbat Khan
33.	Mr. Muhammad Aslam-II	Haq Nawaz
34.	Mr. Gul Mar Khan	Nazam Khan
35.	S. Shafqat Ali Shah	S. Sikandar Shah
36.	Mr. Ubedullah	Sher Ali Khan
37.	Mr. Mohammad Khurshid	Mohammad Nawaz
38.	Mr. Rastab Ali Khan	Atlas Khan
39.	Mr. Mohammad Pervez	Haji Sarfaraz Khan
40.	Mr. Mir Aslam	Mohammad Jan
41.	Mr. Waqeef Khan	Qutab Sher
42.	Mr. Mohammad Saeed	Gul Manan
43.	Mr. Faizullah Khan	Abdullah Khan
44.	Mr. Mir Sheraf Khan	Daim Khan
45.	Mr. Inayatullah-IV	Hakimullah
46.	Mr. Aurangzeb-III	Muhammad Aslam
47.	Mr. Pervez Khan-I	Ali Gohar Khan
48.	Mr. Mushtaq Ahmad-I	Sultan Muhammad
49.	S. Azhar Ali Shah	Mir Wali Shah
50.	Mr. Javed Hamza	Hamzatul Akbar
51.	Mr. Sikandar Khan	Abdul Raziq


TRUE COPY

Sl. No.	Name of Official	Father's Name
52.	Mr. Miruddin	Gul Hayat Shah
53.	Mr. Inamullah	Rahmatullah
54.	Mr. Mohammad Fayaz	Badiuzaman
55.	Mr. Amanullah	Mohammad Ullah
56.	Mr. Mujeebur Rehman-I	Shamsur Rehman
57.	Mr. Awal Khan	Darey Khan
58.	Mr. Qadam Ali	Mansab Ali
59.	Mr. Asad Jan	Bahadar Khan
60.	Mr. Gul Nawaz	Azizur Rahman
61.	Mr. Raza Ullah	Haji Abdur Rahman
62.	S. Maqsood Ali Shah	S. Zafar Shah
63.	Mr. Muhammad Aslam-III	Khani Zaman
64.	Mr. Mohammad Hafeez	Mohammad Shafiq
65.	Mr. Muhammad Asif-I	Mohammad Yousaf
66.	Mr. Shakeel Ahmad	Abdul Wahid
67.	Mr. Shaukat Ali-II	Qalandar Shah
68.	Mr. Nawaz Khan	Waris Khan
69.	Mr. Javed Khan-II	Sadullah Khan
70.	Mr. Fazal Hadi	Abdul Malik
71.	Mr. Ijaz Ahmad	Mohammad Fareed
72.	Mr. Zahid Iqbal	Mohammad Akram
73.	Mr. Zahoorul Haq	Abdul Haq
74.	Mr. Khalid Mahmood	Mohammad Younas
75.	Mr. Mohammad Amjad Khan	Muqadas Ahmad Khan
76.	Mr. Malik Mohammad Fayaz	Malik Fida Mohammad
77.	Mr. Muhammad Ikram	Abdul Shakoor
78.	Mr. Samiur Rahman	Nibat Khan
79.	Mr. Irshad Hussain	Nabi Gul
80.	Mr. Inamullah Khan	Aurangzeb Khan
81.	Mr. Khurshid Ali-I	Ghulam Qadir
82.	Mr. Saifullah-I	Zahirullah
83.	Mr. Khalid Khan-II	Habibur Rahman
84.	Mr. Fazal Maula-II	Zakirullah
85.	Mr. Jan Nisar Khan	Mohammad Y ounas
86.	Mr. Wisal Muhammad	Sultan Muhammad
87.	Mr. Gran Mohammad	Faqir Mohammad
88.	Mr. Bismillah Khan	Nabi Shah
89.	Mr. Habibullah	Haji Rahmatullah
90.	Mr. Shoaibullah	Shafiullah
91.	Mr. Mohammad ibrar	Hazrat Yousaf
92.	Mr. Asim Mehmood Paracha	Abdul Sattar Paracha
93.	Mr. Faisal Mushtaq	Haji Mushtaq Ahmad
94.	Mr. Jehanzeb-II	Ashiq Hussain
95.	Mr. Mohammad Iftikhar	Abdul Sattar
96.	Mr. Nadir-ur-Rahman	Noor Hayat Khan
97.	Mr. Aminuddin	Ayudullah
98.	Mr. Abid Hamza	Hamzatul Akbar
99.	Mr. Abdul Shakoor	Abdul Ghafoor
100.	Mr. Rashid Iqbal	Elahi Bakhsh

TRUE COPY

17

Sl. No.	Name of Official	Father's Name
101.	Mr. Shah Rasul	Hamed Ahmad
102.	Mr. Muhammad Zahir Shah	Mian Gul Mohammad
103.	Mr. Baqi Billah	Mian Mazullah
104.	Mr. Yousaf Ali	Abdul wakeel
105.	Mr. Rahmat Said	Bacha Sahib
106.	Mr. Suleman	Wazir Mohammad
107.	Mr. Abdul Haleem	Misri Khan
108.	Mr. Sher Wali	Nowsher Khan
109.	Mr. Arsala Khan	Gul Mohammad
110.	Mr. Hamid Khan-II	Hakim Khan
111.	Mr. Tariq Masood	Masoodur Rahman
112.	Mr. Abdullah Shah	Jaffar Gul
113.	Mr. Muhammad Ajmir Shah	Muhammad Sharif Khan
114.	Mr. Mujeebur Rahman-III	Alam Sher
115.	Mr. Qaiser Iqbal	Mohammad Iqbal
116.	Mr. Nazar Khan	Farid Khan
117.	Mr. Hazrat Akbar	Safdar Khan
118.	Mr. Abdul Hameed	Mohammad Sarwar Khan
119.	Mr. Shabir Ahmad	Mohammad Yahya Khan
120.	Mr. Muhammad Farooq	Gulistan
121.	Mr. Ilyas Ahmad	Maqbool Ahmad


3.1913
ADMINISTRATIVE OFFICER

TRUE COPY

VAKALATNAMA

In the Court of

Khyber Pakhtunkhwa Service Tribunal, Peshawar

Service Appeal No. _____ of 2018

Petitioner
Plaintiff
Applicant
Appellant
Complainant

Anwar Shad

Decree-Holder

VERSUS

Respondent
Defendant
Opponent
Accused

Govt. of KP etc

Judgment-Debtor

I / We Anwar Shad the above noted Appellant do hereby appointed and constitute, **Muhammad Zafar Tahirkheli & Ansar Ullah Khan Advocates High Court**, to appear, plead, act, compromise, withdraw or refer to arbitration for me / us as my / our counsels / advocates in the above noted matter, without any liability for his default and with the authority to engage any other Advocate / Counsel at my / our cost.

The Client / Litigant will ensure his presence before the Court on each and every date of hearing and the counsel would not be responsible if the case is proceeded ex-parte or is dismissed in default of appearance. All cost awarded in favour shall be the right of Counsel or his nominee, and if awarded against shall be payable by me/us.

I / We authorize the said Advocates to withdraw and receive on my / our behalf all sums and amounts payable or deposited on my / our account in the above noted matter.

A Shad
Client

M. Zafar Tahir

Attested & Accepted (Advocates)

Dated 19/07/2018

Office **ATIQ LAW ASSOCIATES,**
87, Al-Falah Street, Besides State Life Building,
Peshawar Cantt, Phone: 091-5279529
E-mail : zafark.advocate@gmail.com

Ansar Ullah Khan

original copy

BEFORE THE KHYBER PAKHTUNKHWA SERVICE TRIBUNAL, PESHAWAR.

SERVICE APPEAL NO. 915 OF 2018

Mr. Anwar Shad
Senior Clerk / Sub-Divisional Accountant (BS-14) (Not BS-09)
O/O Executive Engineer C&W Provincial Building Construction
Division No.1 Peshawar..... **Appellant**

VERSUS

1. Secretary C&W Department Peshawar
2. Chief Engineer (Centre) C&W Department Peshawar.
3. Administrative Officer C&W Deptt Peshawar..... **Respondents**

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①

BEFORE THE KHYBER PAKHTUNKHWA SERVICE
TRIBUNAL PESHAWAR
SERVICE APPEAL NO.915 OF 2018

1. **Mr. Anwar Shad**
Senior Clerk/ Sub-Divisional Accountant (BS-14) (Not BS-09)
O/O Executive Engineer C&W Provincial Building Construction
Division No.1 Peshawar.....**Appellant**

Versus

1. Secretary C&W Department Peshawar.
2. Chief Engineer (Centre) C&W Department Peshawar
3. Administrative Officer C&W Deptt Peshawar**Respondents**

PARAWISE COMMENTS OF RESPONDENTS-1 TO 3

PRELIMINARY OBJECTION

1. The instant appeal is not maintainable in its present form because neither any Final, Adverse or Appealable orders supplied/ annexed.
2. The Appellant is estopped by his own conduct to file the appeal.
3. The Appellants has deliberately concealed the important facts from this Honorable Tribunal.
4. The Appellant has got no locus standi and cause of action.
5. The Appellant has not come to the Tribunal with clean hands.
6. The appeal is bad for misjoinder and non-joinder of necessary parties.

REPLY TO THE PRAYER

- a) The request to deny the promotion for the next (2nd) time has since been accredited and he is superseded accordingly forever as per the proviso of Sub Rule-5 of Rule-7 of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion & Transfer) Rules, 1989. Copy of memo No.177-E/592/CEC/C&WD dated 06/08/2018 is Annexed-I.
- b) The same as replied at (a) above, hence the instant Service Appeal before this Honorable Tribunal becomes infructuous and not entertain-able on this Score.

2

ON FACTS

1. To clear that the appellant is holding the appointment as portfolio naming Sub-Divisional Accountant since long more than 10 years on same post & station.
2. Correct, appellant is standing at the Top of seniority. He declined promotion some time back in 09/2013, which was accepted and he was not promoted but his stance that he was charged with Criminal Case was irrelevant, not meeting the requirement of official business. If even he was promoted he had to be posted on promotion in the same district at Peshawar.
3. Incorrect that was he, who manured to put pressure through this Tribunal and the judgment as hereunder depicts the exact position: -

“Appellant with counsel and Mr. Abdul Rashid Tareen, Administrative Officer along with Mr. Usman Ghani, Sr. GP for respondents present. During the course of arguments, it was submitted on behalf of the respondent-department that the appellant has not yet been promoted from the post of Senior Clerk to the post of Accounts Clerk. It also revealed that presently Senior Clerks are placed in BPS-14 unlike Accounts Clerks who are still in BPS-09. According to Rule-7 (5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989, a Civil Servant is entitled to forego with his promotion. **While concluding the discussion, this may be observed that presently no relief can be granted to the appellant.** However, for the department guidance Rule-7(5) of the Khyber Pakhtunkhwa Civil Servants (Appointment, Promotion and Transfer) Rules, 1989 may be cited. The appeal is disposed of accordingly. File be consigned to the record”.

4. The same as replied at Para-3 above.
5. Correct, when the appellant declined to avail the promotion in the same scales of Pay viz BS-09 (at that time the post of Accounts Clerk and Senior Clerk was carrying the same Basic Pay Scale in 2013) he was not promoted on the basis of his written intimation dated 19/09/2013 for the consecutive period of 04-Years as described in Sub Rule-5 of Rule-7 of the ibid APT Rules, 1989.

It is incorrect, actually this time the Confidential Reports and Performance Evaluation Reports were called from the office hands in pursuance to Para-1.0 of Booklet of Performance Evaluation Reports instructions which are pre-requisite for all official incumbants that may be said to cope with the future preposition not only the promotion purpose even it is essential under the Rules to be provided for each Calander year in routine preferably in the month of June.

6. Correct, when the appellant again declined to avail the promotion in the same Pay Scale i.e BS-14 (the post of Accounts Clerk & Senior Clerks both are placed this

time in BS-14). His case was placed before the Departmental Promotion Committee (DPC) forum to consider him superseded for future promotion forever to the next tier post of Accounts Clerk under the aforesaid Sub-Rule of the APT Rules, 1989. The appellant has since been informed vide memo dated 06/08/2018 through office hands. It is correct that Show Cause Notice was served on all the similar officials for not submitting ACRs. After personal hearing of each incumbent the Appellant was issued Censure letter.

- 7. As expressed in the preceding Paras of reply, when the appellant vide application dated 19/09/2013 declined promotion he was deferred and not cleared for promotion for the next 04-years which expired by 19/09/2017 as per the referred rules.
- 8. Correct to the extent that the Appellant declined in writing for the 2nd time and as such his case was placed before the DPC forum who as per their recommendations superseded him for the purpose of promotion permanently. The Court/ Tribunal judgment of dated 11/09/2015 is mis-interpreted, actually the proceeding took place in the Tribunal were that: -

“It was submitted on behalf of the Respondent department that the appellant has not been promoted from the post of Senior Clerk to the post of Accounts Clerk. It also revealed that presently the Senior Clerk are placed in BS-14, unlike Accounts Clerk are still in BS-09..... While concluding the discussion this may be observed that presently no relief can be granted to the appellant..... The Appeal is disposed of accordingly.

So, it by itself is suffico to say that the time limitation for the first 04-years shall take count from 19/09/2013 which finally expires by 18/09/2017 and it wrongly assumed to be ending on 10/09/2019.

- 9. Incorrect and mis-conceiving, action on his departmental representation where he submitted for 2nd time declination to avail the promotion in same Basic Pay Scale viz BS-14 the case was placed before the DPC forum which is the right forum in such cases, who accepted the request of appellant for superseding permanently.

ON GROUNDS

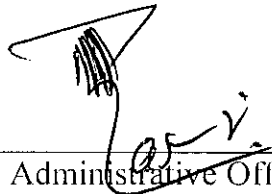
- a) Incorrect and misconceiving. Both the times, when appellant expressed not to avail the promotion in same Pay Scales, he was superseded ever at the present permanently under the rules as described above.
- b) Incorrect and misinterpreted the Court orders dated 11/09/2015. The period of 04-years will take count from the applicant's presentation dated 19/09/2013 which exhausted on 18/09/2017.
- c) Incorrect. Appellant is not promoted at both the times. Appellant is mis-conceiving the Court with sayings that his departmental representations has been ignored.
- d) Incorrect & misconceiving, appellant was not promoted in the first instance when he declined on 19/09/2013. Similarly for the 2nd time he again tendered in writing and as such he is superseded permanently as per the provisio of Sub-Rule-5 of Rule-7 of the APT Rules, 1989. So it is beyond to understand that what the appellant wants from this un-necessary and irrelevant litigations.
- e) Incorrect and baseless imagination is expressed in this Para of appeal. No Adverse orders or retaliatory action has been taken against the Appellant. His request, both the times had been accredited and appellant is superseded from future promotion for permanent base.

As explained in the preceding Paras of reply, the prayer of appellant as described in the concluding Service Appeal at (a) & (b) stands infructuous on the following submissions: -

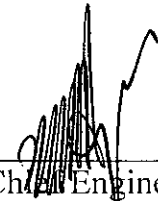
- a) Appellant's name is dropped from the list of promotion to the post of Accounts Clerk and he is posted as Senior Clerk in his own same scale/ pay & post.
- b) Appellant's request to forego promotion for the 2nd time dated 10/04/2018 is since accredited and accepted by the DPC being relevant forum, superseding him permanently for the future promotion to which he is informed officially.

5

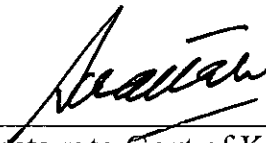
The instant Service Appeal devoid of merits may graciously be dismissed with cost because of the facts that the appellant has not come to the Court with clean hands nor he produced any Final Adverse or Appellate orders of the authority in support of the suit case.



Administrative Officer
C&W Department
Peshawar
(Respondent-3)



Chief Engineer (Centre)
C&W Department Peshawar
(Respondent-2)



Secretary to Govt of KP
C&W Department Peshawar
(Respondent-1)



ANNEX-I

6

OFFICE OF THE CHIEF ENGINEER (CENTRE)
COMMUNICATION & WORKS DEPARTMENT
KHYBER PUKHTUNKHWA, PESHAWAR

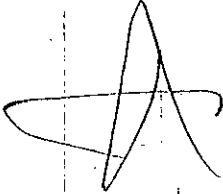
No. 177-E / 592 / CEC / C&WD

Dated Peshawar the 06 / 08 / 2018

To

Mr. Anwar Shed
Senior Clerk, O/O Superintending Engineer
PBC Peshawar.

Subject: DEPARTMENTAL REPRESENTATION

 06/08

As you have declined to avail the benefits of promotion to the cadre post of Accounts Clerk for 2nd time vide your representation date 10/04/2018 received through Executive Engineer PBC-I. Your request to forgo the promotion for the 2nd time is accredited and shall stand superceeded permanently for promotion in the future as described in the proviso of sub Rule 5 of Rule-7 of the Khyber Pukhtunkhwa Civil Servants (APT) Rules 1989.

DA As above:


CHIEF ENGINEER (CENTRE)

Copy to the:

1. Superintending Engineer PBC C&W Department Peshawar.
2. Executive Engineer PBC-I C&W Department Peshawar.

CHIEF ENGINEER (CENTRE)