C.o.T.'S WRITTEN ASSERTION TO THE SENATE ABOUT PARTS OF THE BCI REPORT BEING FABRICATED OR FALSIFIED.

Examples of inaccuracies in Telstra's Answers to The Senate in Response to Specific Questions asked of it by individual Senators.

Example 1

Senator Schacht's Question:

Questions have been raised concerning alleged inaccuracies in a Bell Canada International Report dated 10 November 1993. I understand the report relates to Cape Bridgewater. Are you aware of any inaccuracies? If so, when did you become aware of the inaccuracies? What were those inaccuracies? Were the findings of the report flawed by such inaccuracies, if there are inaccuracies?

Telstra's Answer:

The Bell Canada International Report (the BCI Report) does not relate only to Cape Bridgewater, rather it also deals with other parts of the Telstra network.

The only inaccuracy in the BCI Report which Telstra is aware of is an apparent clash in the dates of two sets of testing to the Portland Exchange, Cape Bridgewater RCM (CBWR) number range, test line 055 267 211, see section 15.23 of the BCI Report.

By way of a letter dated 6 September 1994, Telstra wrote to Bell Canada International (BCI) noting this apparent clash in dates and seeking BCI's comments to same. A copy of Telstra's letter to BCI is Attachment G. Attachment H to these answers are copies of two letters received by Telstra from Gerald Kealey of Bell Canada International in response. In those letters, Mr Kealey notes:

"Unfortunately, the wrong date was recorded in the hand written notes which was transcribed to the final report for Telstra. It must be pointed out that, while the actual date was incorrectly recorded, this error does not affect the validity of the testing process or the test results and is not a significant factor in assessing the overall performance of the network."

C.o.T. Cases Australia state the truthful and fair answers to the Senator's questions should be:-

Question:

Questions have been raised concerning alleged inaccuracies in a Bell Canada International Report dated 10 November 1993. I understand the report relates to Cape Bridgewater.

Answer:

The Bell Canada International November 1993 Report (the BCI Report) does not only relate to Cape Bridgewater, it also deals with other parts of the Telstra network.

Question:

Are you aware of any inaccuracies?

Answer:

Yes.

Question:

If so, when did you become aware of the inaccuracies?

Answer:

Prior to 6 September 1994.

Question:

What were those inaccuracies?

Answer:

In one test all of the start and finish times and dates as stated in the report are wrong. All of the Test Results are wrong. The inaccuracies in the test results are not detectable on reading the report as the report does not disclose that Telstra was performing NEAT test calls to the same Test Number during the times Telstra was performing test calls for BCI.

Question:

Were the findings of the report flawed by such inaccuracies, if there are inaccuracies?

Answer:

Yes.

C.o.T.'s reasons for asserting its answers to the Senator's questions are truthful and Telstra's response to the Senator's questions are wrong and misleading:

Telstra stated to The Senate:-

The only inaccuracy in the BCI Report which Telstra is aware of is an apparent clash in the dates of two sets of testing to the Portland Exchange, Cape Bridgewater RCM (CBWR) number range, test line 055 267 211, see section 15.23 of the BCI Report.

Telstra's above statement contradicts the content of its 6 September 1994 letter to BCI and other facts known to it at the time it made this statement to the Senate.

In Telstra's 6 September 1994 letter to BCI, on page 2, in the paragraph commencing *"It appears..."*, Telstra states, *"... the test calls to Cape Bridgewater Test No. (055 267 211) should have been recorded as beginning at approximately 4.18 pm on 3/11/93 (rather than 12.45 pm on 5/11/93) and finishing at about 12.45 pm on 4/11/93 (rather than 4.18 pm on 5/11/93), with other aspects of the test run remaining the same as previously recorded. These timings fit in with other test runs from the Richmond TRT line and with other test runs from other exchanges to the same line at Cape*

Bridgewater. They also provide a logical sequence in the overall test program and a reasonable average test call interval (43.9 sec. per call)."

The above Telstra statement made in September 1994 to BCI, acknowledges in one of the tests all of the starting and finishing dates and times are wrong due to inconsistency in recording. The same statement alleges the test results were accurately recorded.

Telstra know, as a result of it conducting two different types of tests, at the same time, to the same test number, the published BCI test results for the test with amended dates and times were impossible to achieve, as it was impractical.

Telstra's reliance upon and use of Gerald Kealey of Bell Canada statement, *"Unfortunately, the wrong date was recorded in the hand written notes which was transcribed to the final report for Telstra. It must be pointed out that, while the actual date was incorrectly recorded, this error does not affect the validity of the testing process or the test results and is not a significant factor in assessing the overall performance of the network."* as part of their answer to The Senate is misleading, deceptive and unconscionable.

Telstra are aware BCI 11 August 1995 response to Telstra, relied upon the information contained in Telstra 6 September 1994 letter to BCI. Telstra letter to BCI failed to disclose Telstra was conducting NEAT Testing to the same Test Number for the majority of the same time of the period between the alleged new start and finishing dates and times of the test that was the subject of their correspondence. (Refer to page 167 of the April 1994 AUSTEL C.o.T. Report which identifies the dates and times Telstra conducted the NEAT Testing to the same Cape Bridgewater Test Number.)

BCI's 11 August 1995 response to Telstra can only be, at best, described as "*a statement of convenience*", as the test call results, as stated, are not achievable.

When all of the facts involved in the use of the Cape Bridgewater Test Number (055) 267 211 including the Types and number of tests, each type of test call separation requirement, and number of test calls are examined by an Independent Telecommunications Consultant it will prove the stated test result as being fabricated or falsified.

The following information supports this statement.

1. In the November 1993 Bell Canada International (BCI) Report, it lists alleged results of monitoring and testing Telstra performed in accordance with the BCI procedures.

   The Report states CCS7 data was used to record the results of the test calls Telstra made on behalf of BCI.

   This type of test call require greater than 15 seconds separation between each test call. (Refer to the Internal Telstra document FOI No K03888).

   As each test call is held for 15 seconds, there must be more than 15 seconds separation between each test call to prevent :-

   a) the latter test call clashing with the previous test call still in progress,

   b) the latter test call being recorded as incorrect results of busy.

2. Page 157 of the April 1994 AUSTEL C.o.T. Report, lists the table of Telstra NEAT testing results to Cape Bridgewater Holiday Camp, Test No. (055) 267 211 during the business hours of 0800-2200 for the period between 28 October 1993 to 8 November 1993 inclusive.

When NEAT testing is being performed to a telephone number, each test call is held for 100 seconds to conduct transmission tests and detect drop-outs etc. confirmed in the 10 November 1993 Telstra letter to AUSTEL. (Refer to FOI document No. K35002.)

As each NEAT test call is held for 100 seconds, there must be more than 100 seconds separation between each NEAT test call to prevent :-

a) the latter test call clashing with the previous test call still in progress,

b) the latter test call being recorded as incorrect results of busy or a failed call .

During NEAT testing to a telephone number, it is impractical to perform any other form of monitoring and testing, at the same time, to that same telephone number.

Performing two (2) different types of test calls to the same Test No at the same time is impractical as it would produce negative or inconclusive results.

3. In the November 1993 BCI Report (re Cape Bridgewater), it lists dates and times of alleged test call results (of the Telstra monitoring and testing performed on behalf of BCI) made to the same Test No. (055) 267 211 at dates and times the Test No was set up for and was being used by Telstra for NEAT testing in compliance with AUSTEL directive. (Refer to page 157 of the AUSTEL April 1994 C.o.T. Report.)

As Telstra, in response to AUSTEL directive, was performing NEAT testing to the Test No. (055) 267 211, between the hours of 0800 and 2200 for the period 28/10/93 to 8/11/93 inclusive, this meant the alleged test calls performed by Telstra on 3/11/93 and 4/11/93 for BCI (with the new start and finish times) were being made at the same time to the same Test No. as the NEAT test calls, which, by Telstra's admission, is impractical. (Refer to the internal Telstra document FOI No. K03888).

This alleged simultaneous testing to the same Test No during the periods of time from 1618 hours to 2200 hours on 3/11/93 and from 0800 hours to 1245 hours on 4/11/93 would have meant :-

a) most, if not all, of the test calls for BCI would have clashed with the NEAT test calls and the BCI test results would have reported a high number of busy or failed calls,

b) some of the NEAT test calls would have clashed with the test calls made for BCI and NEAT test results would have reported an unacceptable number of busy or failed calls,

due to, NEAT testing requirement of more than 100 seconds separation, and the BCI test call requirement of more than 15 seconds separation, between each test call.

C.o.T. member Mr Alan Smith has received from Telstra, under FOI, computer disks containing NEAT testing data and results confirming the NEAT testing as reported in the AUSTEL April 1994 C.o.T. Report did take place during the times as stated.

4. In 1994 Alan Smith requested from Telstra under FOI the CCS7 data on the Telstra test calls made to Cape Bridgewater Test No (055) 267 211.

During Mr Smith's arbitration Telstra supplied CCS7 data for the days between:-

a) May 1993 and some of October 1993, representing approximately 180 days,

b) late November 1993 to August 1994, representing approximately 270 days.

but not the CCS7 data for the 7 days, for the period of 3 November to 9 November 1993 inclusive, which are some of the specific days Mr Smith requested.

Despite repeated requests, Telstra have not provided any CCS7 data, for the time it allegedly made test calls for BCI to the Cape Bridgewater Test No (055) 267 211.

Telstra also require the CCS7 data to prove:-

a) the test calls did take place as alleged,

b) the test results published in the BCI Report are not fabricated or falsified.

Example 2

Senator Boswell:

Why did Telstra not advise the Arbitrator, the Administrator or the C.o.T. Cases that the BCI Report was flawed?

Answer:

Telstra has not at any time believed that the BCI Report was flawed. In relation to the allegations made by Mr Smith that the BCI Report was flawed, Telstra notes that Mr Smith raised these allegations with the Arbitrator during his arbitration and with the Administrator.

C.o.T. Cases Australia state the truthful answer to the Senator's question should be:

a) Prior to September 1994, Telstra knew that the details published in the November 1993 BCI Report about one test to Cape Bridgewater were not correct. In this particular test the reported starting and finish times and dates meant the test results were unachievable.

b) Telstra wrote to Mr Kealey of Bell Canada International (BCI) on 6 September 1994 about the alleged anomaly found in its test call records used by BCI to compile the "Bell Canada International Inc. REPORT TO TELECOM AUSTRALIA 1 NOVEMBER 1993".

Telstra, in its letter, stated in one part, *"Specifically, the start and finish times for the test run from Richmond digital exchange (RCMX), test line 03 428 6974, to Portland exchange, Cape Bridgewater RCM (CBWR) number range, test line 055 26 211, (detailed in section 15.23 of the report) are impracticable. The number of calls made during the test run could not have been completed within the time span shown and the test run would have clashed with other test runs performed within those times."* The same letter suggested new start and finish times and dates as they provide a logical sequence to the overall test program and a reasonable average test call interval (43.9 seconds per call). (Refer to Telstra letter to BCI dated 6 September 1994, FOI Nos. N00005 and N00006.)

c) In Telstra's letter to BCI, it did not disclose that Telstra were conducting NEAT testing to Cape Bridgewater Test Number 055 267 211 during the same times and dates Telstra was making test calls for BCI to the same test number. The dates and times of this NEAT testing coincided with a major period contained within the suggested new start and finish times and dates of the test Telstra previously acknowledged the result was impractical.

d) Mr Smith raised these BCI allegations with the Arbitrator and Administrator in his arbitration. Mr Smith made repeated requests under FOI and arbitration to be supplied with the CCS7 Data of the test calls Telstra allegedly made for BCI. Telstra still has not supplied Mr Smith the requested CCS7 Data. Without hard evidence, Mr Smith was unable to conclusively prove to his Arbitrator the test results are fabricated or falsified.

e) In August 1995, BCI, in its letter to Telstra, agreed in writing with all of Telstra's assertions contained in Telstra's letter dated 6 September 1994. BCI's confirmation to Telstra was made without being supplied the information Telstra were conducting NEAT testing during the same time to the same test number as Telstra alleged it was conducting the test calls for BCI.

Example 3

Senator Boswell:

Has Telstra provided to the C.o.T. Cases "data" in disk form or hard copy, generated from the testing identified in the BCI Report?

Telstra's Answer:

Telstra has provided to various CoT members data in disk form generated from the testing identified in the BCI Report and hand written tables of data generated from the testing identified in the BCI Report. This data provided by Telstra is not a complete set of the data generated from the testing identified in the BCI Report.

C.o.T. Cases Australia state the truthful answer to the Senator's question should be:

a) Telstra has not provided Alan Smith with CCS7 Data generated from the Telstra testing to the Cape Bridgewater Test Number identified in the November 1993 BCI Report.

b) Telstra has not provided all C.o.T. members with its working papers created prior to, during and after the completion of its testing which were used by BCI to generate the November 1993 BCI Report.

c) Telstra has not provided, in disk form or hard copy, information about initial test calls identifying difficulties, problems and faults within the network experienced during the beginning of the test call program and initial test call results of the testing program used in the November 1993 BCI Report.

d) Telstra has only provided some C.o.T. members with data in disk form generated from separate testing identified in another BCI Report named Rotary Hunting Group Study Report, which was performed and created after the November 1993 BCI Report. This data does not include:-

- those test calls from locations chosen then abandoned as a result of difficulties, problems and faults experienced during the initial test call program.
- initial test calls identifying difficulties, problems and faults within the network experienced during the beginning of the test call program and initial test call results.

Enclosed are Telstra documents gained under FOI and extracts from the AUSTEL C.o.T. Report, which support C.o.T.'s assertion.

Telstra executive Hew MacIntosh stated in F.O.I. document K03888 that Telstra's internal PTARS 267211 testing *"will hold up for 15 seconds after a test call, therefore if possible a delay of 15 seconds between calls should be inserted to avoid incorrect results"*.

Facsimile

Telecom Australia

To	Steve Hodgetts Network Products	From	Hew MacIntosh PTTO2
Facsimile	(053)33-6219	File	NTI0/504
Company	Telecom Australia	Date	7 July, 1993
Location	Ballarat Exchange	Total Pages	1

Attn.

K03888

Test Calls to Cape Bridgewater

National Network Network Investigation, Melbourne, are currently investigating a customer at Cape Bridgewater. Some complaints have come from the Ballarat area, namely Sebastapol, Cardigan (053-448267), Loretto College (053-332682, 053-301521) & Haddon (053-424675).

As previously discussed, could you please arrange for 500-1000 test calls from the following locations calling 055-267211. The latter is a PTARS connected at the Cape Bridgewater RCM. It should be noted the PTARS will hold up for 15 seconds after a test call, therefore if possible a delay >15 seconds between calls should be inserted to avoid incorrect results of busy.

When completed, could you please fax results to National Network Network Investigation, Melbourne, on (03)654-4601.

Your assistance in this matter will be greatly appreciated and if there are any difficulties please contact NNI on (03)657-3447.

Hew MacIntosh
PTTO2 - National Network Network Investigation, Melbourne.
7/7/93

© R.A.P.

TOTAL P.01

Telecom AUSTRALIA

Minute

Subject COT Network Testing Program

File

Date 10 November 1993

From D Shepherd

David Shepherd
Manager Networks and Interconnect
Network Performance Sub-Unit
Network Operations

Australian and Overseas
Telecommunications Corporation

Telephone: 08 2368396
08 8347443
International: + 61
Facsimile: 08 4184032

To: Mr J MacMahon
General Manager
Consumer Affairs
AUSTEL

K35002

Dear Mr MacMahon,

The network testing program specified in Paragraph 16(a) of your minute of 12 August 1993 in connection with the COT cases has been completed and results are attached.

The test lines used to terminate the calls were chosen to be within the same equipment groups as the monitored COT customer services (not necessarily in the same number group). In each case a minimum of 1000 calls were generated from a variety of one the these test lines.

The equipment used for the tests to all but two of the exchanges concerned was the Eriesson Network Evaluation and Test System (NEAT). This system establishes calls between Network Test Units connected to customer line appearances in the exchanges. Each test call is held for 100 seconds to conduct transmission tests and detect drop-outs etc. The attached results indicate the range of origins used for each program and the spread of the test calls over time of day. In the case of the NEAT system there are some null periods in which no calls are generated due the the equipment requiring time slots to communicate with the central control unit to convey results and accept commands.

The test calls were run over a longer period of the day and in some cases over weekends in order to enable sufficient calls to be generated to achieve the target number in the required time and also to include evening and weekend high traffic periods.

For those exchanges without NEAT units (Jindabyne and Devlins Bridge) the tests were conducted using either Traffic Route Testes or Electronic Automatic Exchange Testers directing calls to Test Call Answer Relay Sets located in the exchanges concerned. In each of these cases the exchanges are connected via one junction route to their parent exchange and the possibilities of access paths are therefore limited. Consequently the range of origins chosen are more restricted than those for the NEAT tests.

TELECOM'S TEST CALLING INTO CAPE BRIDGEWATER AXE/RCM EQUIPMENT

Cape Bridgewater Holiday Camp: 28 October 1993 to 8 November 1993 inclusive

Test No (055) 267 211
Business hours 0800-2200

	24 hour calling		Business hours calling	
	Sample	% of calls	Sample	% of calls
Total calls	1030		390	
Effective calls	1023	99.32	387	99.23
Total failed calls, as below	7	0.68	3	0.77
Congestion	2	0.19	1	0.26
Communications error	1	0.10	1	0.26
RVA/Wrong number	0	0.00	0	0.00
No answer	0	0.00	0	0.00
Couldn't break dial tone	1	0.10	0	0.00
System error	3	0.29	1	0.26

TELECOM'S TEST CALLING INTO DIXONS CREEK AXE EXCHANGE

Lovey's Restaurant: 21 October 1993 to 8 November 1993 inclusive

Test Nos (059) 652 414 and (059) 652 415
Business hours 0800-2200

	24 hour calling		Business hours calling	
	Sample	% of calls	Sample	% of calls
Total calls	1279		556	
Effective calls	1269	99.22	552	99.28
Total failed calls, as below	10	0.78	4	0.72
Congestion	5	0.39	3	0.54
Communications error	1	0.08	1	0.18
RVA/Wrong number	0	0.00	0	0.00
No answer	0	0.00	0	0.00
Couldn't break dial tone	4	0.31	0	0.00
System error	0	0.00	0	0.00

6 September 1994

Telecom AUSTRALIA
Central Area
Network Operations
6/171 Roma Street
Brisbane
Australia

Ph (07) 837 3212
Fax (07) 236 4247

Mr G. Kealey
Bell Canada International
Suite 800, 1 Nicholas Street
Ottawa, Ontario, Canada, K1N 9M1

Gerry,

N00005

As you have been made aware through discussions with Mr K. Dwyer, an anomaly has been found in the test call records contained in the report "Bell Canada International Inc. REPORT TO TELECOM AUSTRALIA 1 NOVEMBER 1993'.

Specifically, the start and finish times for the test run from Richmond digital exchange (RCMX), test line 03 428 8974, to Portland exchange, Cape Bridgewater RCM (CBWR) number range, test line 055 267 211, (detailed in section 15.23 of the report) are impracticable. The number of calls made during the test run could not have been completed within the time span shown and the test run would have clashed with other test runs performed within those times.

An examination of the test result summary forms filled out after the test runs (a copy of the relevant record forms is enclosed) reveals that the report details have been correctly derived from the summary forms.

This inconsistency in recording of times for a test run is not a fundamental flaw in the test results or the conclusions of the report, but the proper times of the run should be recorded if at all possible.

Discussions with a number of people assisting with the test call program during that period confirmed that considerable care was take to avoid clashes of test calls to test answering bases and to ensure that test calling devices originated calls only to a single terminating test code during any test run.

From their recollections of events several points regarding the sequence of events have been brought together:

- The tests were initiated to provide extra data from test calls into the number ranges of the CoT customers connected to Devlin's Bridge exchange and Portland exchange. The data was to be added as an addendum to the report dated 1 November 1993.
- Testing began Wednesday 3/11/93. Traffic Route Testers (TRT's) in the NIB test room 7/35 Collins Street Melbourne originated calls, via test lines connected to Richmond exchange, to test answering bases at Portland exchange and Devlin's Bridge exchange. A portable TRT at South Yarra exchange was also used to originate calls to the same exchanges.

A63152

FOI RECEIVED 26/5/95

- As Mr G. Kealey and Mr R. Baltais intended to travel to Portland exchange (via Warrnambool exchange) on Friday afternoon 5/11/93, they ensured that a TRT run from Richmond had finished and that a run from the South Yarra TRT had commenced satisfactorily before they left Melbourne at approximately 12.45 that day. They also arranged for test calls to begin from Bendigo exchange that afternoon, and made a call from Warrnambool exchange to South Yarra exchange late in the afternoon to ensure the South Yarra TRT had completed its test run program and stopped.

- No staff recalls or attendance were recorded or required at either South Yarra or Richmond exchange to attend to TRT's on Friday 5/11/93 or the weekend 6/11/93 & 7/11/93.

A complete examination of the times of the test calls from all the exchanges to the test lines at Cape Bridgewater and Devlin's bridge over the period from 3/11/93 to 9/11/93 shows that the only time the test run from the Richmond digital test line to the Cape Bridgewater 055 267 211 test answer base could have been made, without clashing with other test calls to the same test number, was between the afternoon of 3/11/93 and about midday of 4/11/93.

It appears that the details for the test run from the Richmond digital test line (03 428 8974) to Cape Bridgewater RCM (055 267 211) should have been recorded as beginning at approximately 4.18 pm on 3/11/93 (rather than 12.45 pm on 5/11/93) and finishing at about 12.45 pm on 4/11/93 (rather than 4.18 pm on 5/11/93), with other aspects of the test run remaining the same as previously recorded. These timings fit in with other test runs from the Richmond TRT line and with other test runs from other exchanges to the same line at Cape Bridgewater. They also provide a logical sequence in the overall test program and a reasonable average test call interval (43.9 sec. per call).

A table has been drawn up to show the test calls made over the period and is attached, showing the test run between the Richmond digital test line and the Cape Bridgewater test line in this logical time-slot within the overall test run program.

Could you please confirm whether or not this interpretation of the sequence of test runs matches with your recollections and personal notes, or whether there is any other way to correct the records of the test runs shown in the report.

N00006

Alan Humfrey
GENERAL MANAGER
CENTRAL AREA

DRAFT

Commercial & Consumer

Level 8
242 Exhibition Street,
MELBOURNE VIC 3000
Australia

Telephone (03) 634 6
Facsimile (03) 634 3

15 December 1993

VIA FACSIMILE

Mr R. Davey
Chairman
AUSTEL
Jetset House, 5 Queens Road
MELBOURNE, Vic. 3004

Dear Mr Davey,

I refer to the following events involving AUSTEL officers in recent days regarding the Bell Canada International (BCI) report.

- A letter of 9 December 1993 from Mr Mathieson to me.
- Comments attributed to Mr MacMahon on 10 December 1993 in the "Australian Financial Review".

  Advice to Telecom is that the comments attributed to Mr MacMahon are, in substance, accurate.
- A letter reported in the same article from Mr MacMahon to the CoT spokesperson, Mr Schorer.

The conclusion to be reasonably made from these events is that AUSTEL publicly judges the BCI report "fails to live up to expectations raised by the terms of reference", has inadequacies, and raises concerns. Further, AUSTEL publicly agrees with CoT views along these lines.

Reasonable inferences might be drawn about deficiencies in the competence, professional standing and integrity of BCI, and the competence and integrity of Telecom and myself in the conduct of the study and representation of the findings.

We can argue about matters of detail, but in substance these events are of concern and disappointing to Telecom.

A00404

PERSPECTIVE

Before stating Telecom's position, I point out the considerable efforts Telecom has made to assist AUSTEL in its investigation of CoT cases. Telecom has gone well beyond the usual responses to AUSTEL's directions, to actively support AUSTEL in an attempt to achieve as thorough and objective an assessment as possible of the issues in the limited time available, in some cases at considerable risk to its own position.

It would be difficult to conceive of any significant, practical additional action Telecom could have taken to support AUSTEL, given resources were already stretched, to respond to AUSTEL's directions.

In Telecom's view, AUSTEL may criticise Telecom at times for shortcomings in competence or judgement, but in no way can AUSTEL claim lack of co-operation, obstruction or bad faith during the investigation in what has been a difficult period for both parties.

Indeed, Telecom hopes AUSTEL's view is the reverse.

TELECOM'S POSITION

Telecom's position regarding the recent events concerning the BCI report are as follows:

1. ***The BCI study was conducted professionally by BCI and Telecom, and in the limited time available, achieved the objectives discussed and agreed with AUSTEL.***

   The findings are reassuring to Telecom and ought to be reassuring and welcomed by AUSTEL and telephone users around Australia - at least for the test period there appears no evidence that there is a fundamental problem in the interexchange and local exchange network and that the network performed within specification.

   You will recall the study arose following (unsubstantiated) allegations that a fundamental problem in Telecom's network may be preventing a large number of calls being delivered by the network to the terminal exchanges to which those customers were connected.

   The basic aim of the BCI study was, in the short time available, to test the network and assess related operating procedures for fault detection and restoration.

   Alleged failures in the letter of 9 December, such as exclusion of the CAN and exclusion of "end-to-end" testing, were not necessary to be included to achieve the aim of the study, were specifically excluded (with the agreement of your officers),

A00405

were not included and were never purported to be included either in the findings or subsequent presentations of the findings.

The terms of reference and conduct of the BCI study were discussed on a number of occasions with your officers, and they raised no concerns of substance. Indeed, on several occasions, they apparently considered the basis of the study sufficiently sound to suggest a number of additions to the testing programme (e.g. Portland and Devlin's Bridge), and these were accepted.

My understanding is that AUSTEL further requested testing in customers' premises, but then decided that this was a duplication of the service monitoring programme directed by AUSTEL, would serve little purpose, and risked disruption of the customers' services.

You will recall in the presentation of the report to you I particularly pointed out the limitations of the study, and this was done in presentations to the Minister's office, Senators Boswell, Alston and Bourne, the media, and CoT members present at a videoconference.

In summary, the BCI study proceeded as discussed with AUSTEL, reported as directed, and the findings ought to be regarded as reassuring and welcome.

Briefly, an acceptable conclusion would have been along the lines of the previous sentence, but with a qualification that to obtain a complete assessment of the performance of a particular customer's service, "end-to-end" testing would need to be done which included the customer access network.

2. Telecom is concerned about several other aspects of these events. For example:

(a) AUSTEL reached a conclusion about Telecom without giving Telecom the opportunity to comment.

In this case, the position was advised to others and made public before Telecom was advised.

In an investigation of Telecom, it would seem reasonable that Telecom be given such an opportunity.

(b) AUSTEL allows (an unfair) position to be made public which appears to support other parties in a civil suit against Telecom.

In Telecom's view, the task of a regulator in investigations of this nature is to form conclusions and decide related recommendations and intended actions on an issue and, after due discussion with the parties, publish these in its report.

B

We believe AUSTEL risks its reputation if, during an investigation, it appears to take sides in civil proceedings between parties - in this case, arbitration, but court proceedings in the future on matters under investigation are possible.

3. Considering the above circumstances, Telecom cannot agree to attach a copy of AUSTEL's letter of 9 December to the BCI report if the latter is made available to the assessor(s) nominated for the CoT cases.

Accordingly, Telecom requests AUSTEL to confirm Telecom's view of the BCI report, and to consider how our concerns might be addressed.

I am available to discuss the above matter at your convenience.

Yours sincerely,

States there is a multitude of inaccuracies.

Ian Campbell

This is a s'ment to c'mon of Austel that we (T) did not provide assessor with all the relevant facts

A00407

326

COT

[redacted] (A)

Holmes, Jim

From: Pinel, Don
To: Hambleton, Dennis V
Cc: Holmes, Jim; Campbell, Ian
Subject: Tariff filing
Date: Monday, 20 December, 1993 1:02PM

A00354

Dennis,

I understand there is a new tariff filing to be lodged today with new performance parameters one of which commits to 98% call completion at the individual customer level.

Given my experience with customer disputes and teh recent BCI study, this is cause for concern. We will not meet this figure in many exchanges around Australia particularly in country areas.

I assume that it is too late to stop the filing (and we may not want to even if there is a downside) but this has potential to cause us major pain in the CoT area.

Don

Golden Messenger - Mr G Schorer
Network Changes

1. INTRODUCTION

1. This section describes the telephone services that were provided to Golden Messenger - Mr Schorer at North Melbourne in Victoria. The business telephone services were initially provided from the North Melbourne ARE Telephone Exchange. However, these telephone services were transferred to the North Melbourne System 12 Telephone Exchange when the North Melbourne ARE Telephone Exchange was replaced with System 12 equipment.

2. Four network configuration diagrams have been provided in Appendix 1 to illustrate the development of the network routing to the North Melbourne Telephone Exchange from 1985 to 1996. These diagrams clearly demonstrate the major network changes that have occurred at the North Melbourne Telephone Exchange during this period.

3. All routing examples are for calls from the Blackburn Telephone Exchange as this was one of the Telephone Exchanges included within the area shown on Mr Schorer's coverage map.

1.1 NETWORK CONFIGURATION AT 1985 - (APPENDIX 1, FIGURE 1)

1. Figure 1 shows the routing options for calls to the North Melbourne ARE Telephone Exchange from the Blackburn ARE Telephone Exchange.

2. Calls that were unable to use the direct route from the Blackburn ARE Telephone Exchange automatically selected the second or third alternate routes.

3. The only common parts of the route were the North Melbourne ARE Telephone Exchange and the Blackburn ARE Telephone Exchange.

1.2 NETWORK CONFIGURATION AT 1992 - (APPENDIX 1, FIGURE 2)

1. Figure 2 shows that the Blackburn Telephone Exchange was extended by additional AXE equipment in the form of a Remote Switching Stage (RSS) which was parented off the Box Hill AXE Telephone Exchange.

2. Calls to the North Melbourne ARE Telephone Exchange were now routed different ways depending on which part of the Blackburn Telephone Exchange was used.

3. The only significant common point for calls from both parts of the Blackburn Telephone Exchange was the North Melbourne ARE Telephone Exchange.

1.3 NETWORK CONFIGURATION AT 1993 - (APPENDIX 1, FIGURE 3)

1. Figure 3 shows that the Blackburn Telephone Exchange was extended by additional System 12 (S12) equipment which was parented off the Northcote Telephone Exchange S12 Host. Also at this time the Blackburn ARE equipment was connected directly to the Box Hill AXE Telephone Exchange.

2. Similarly the North Melbourne ARE Telephone Exchange was now connected only to the North Melbourne AXE Telephone Exchange.

3. Calls to the North Melbourne ARE Telephone Exchange were routed different ways depending on which part of the Blackburn Telephone Exchange was used.

4. The only significant common points for calls from all parts of the Blackburn Telephone Exchange were the North Melbourne AXE and ARE Telephone Exchanges.

1.4 NETWORK CONFIGURATION AT 1996 - (APPENDIX 1, FIGURE 4)

1. Figure 4 shows that the Blackburn ARE exchange equipment had been removed leaving only AXE and System 12 equipment. Similarly the North Melbourne ARE exchange equipment had been replaced with System 12 equipment.

2. Calls to the North Melbourne System 12 Telephone Exchange were still routed different ways depending on which part of the Blackburn Telephone Exchange was used.

3. The only significant common points for calls from both parts of the Blackburn Telephone Exchange was the North Melbourne System 12 Telephone Exchange.

APPENDIX 1

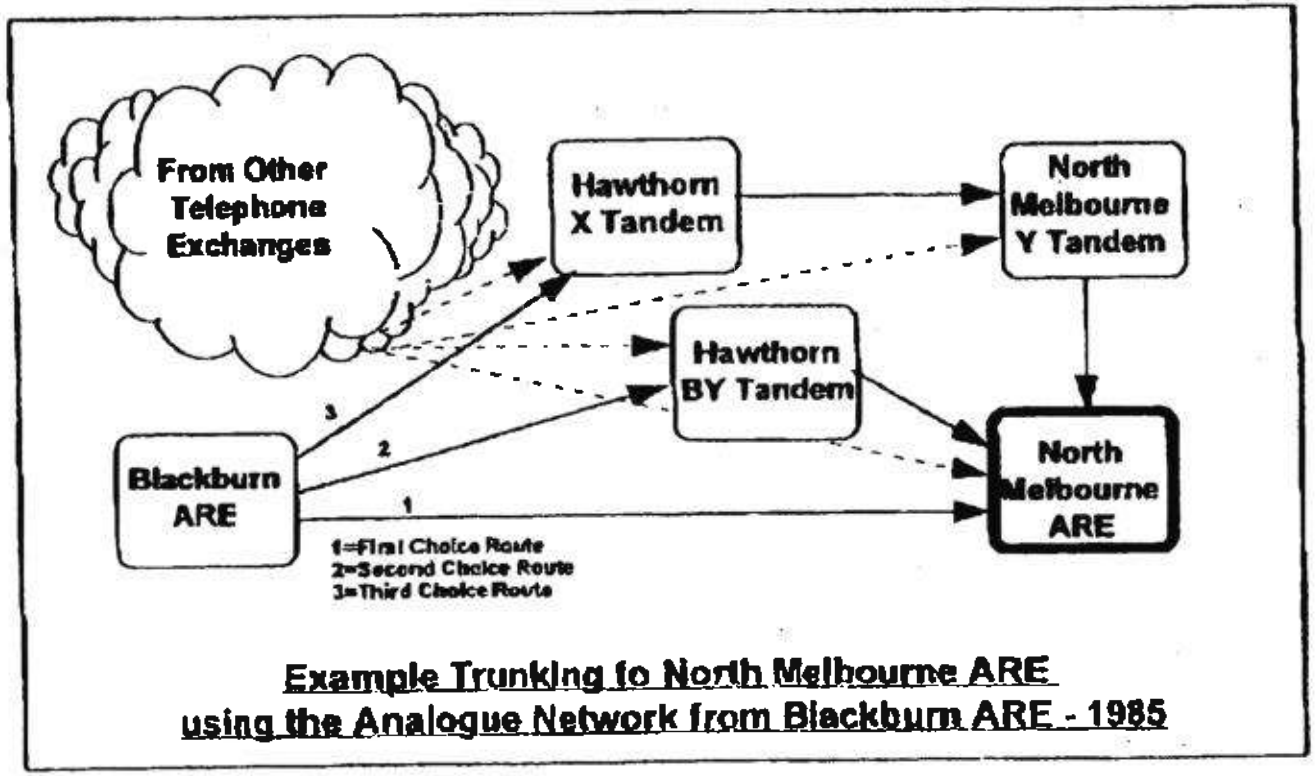

Figure 1

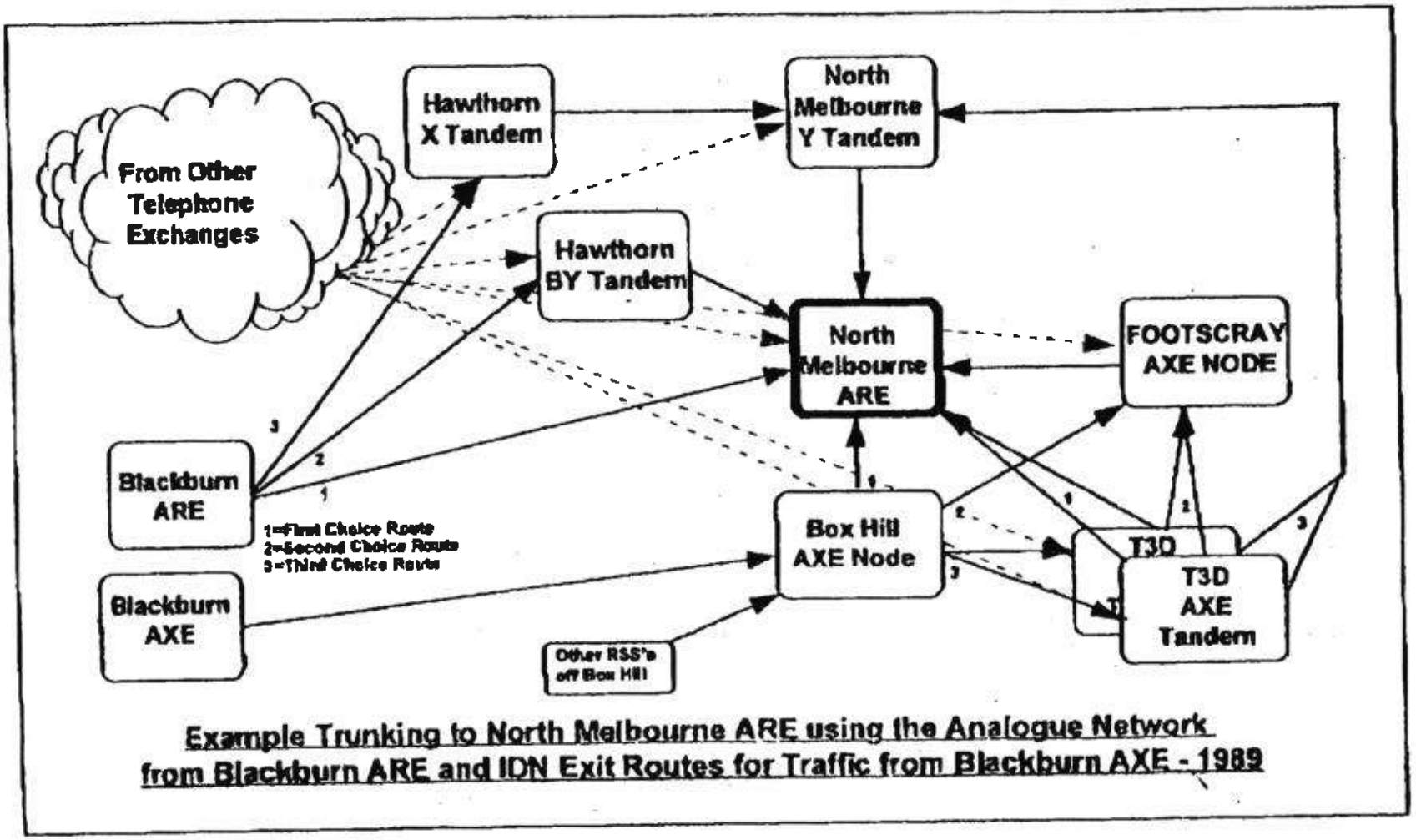

Figure 2

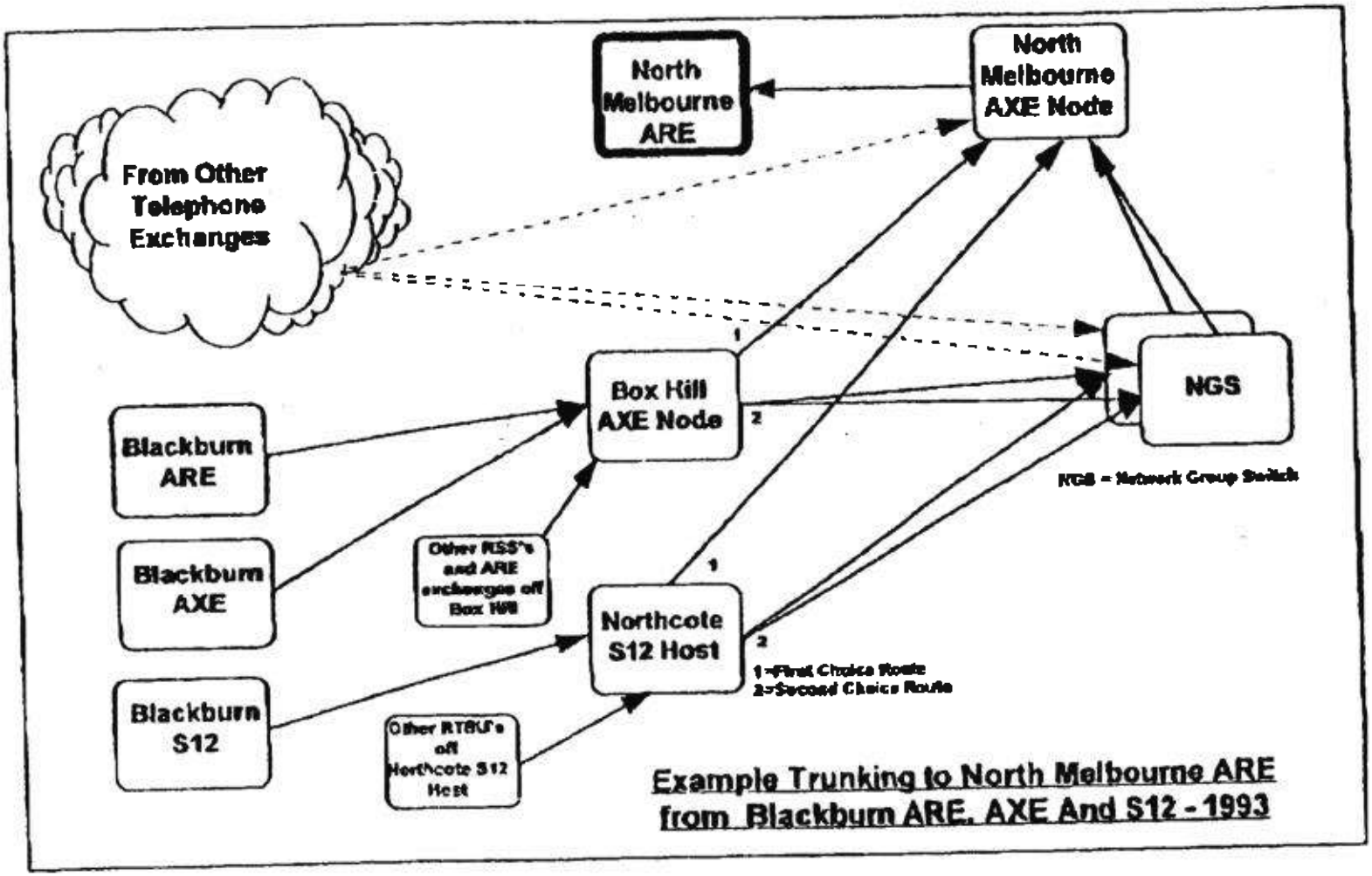

Figure 3

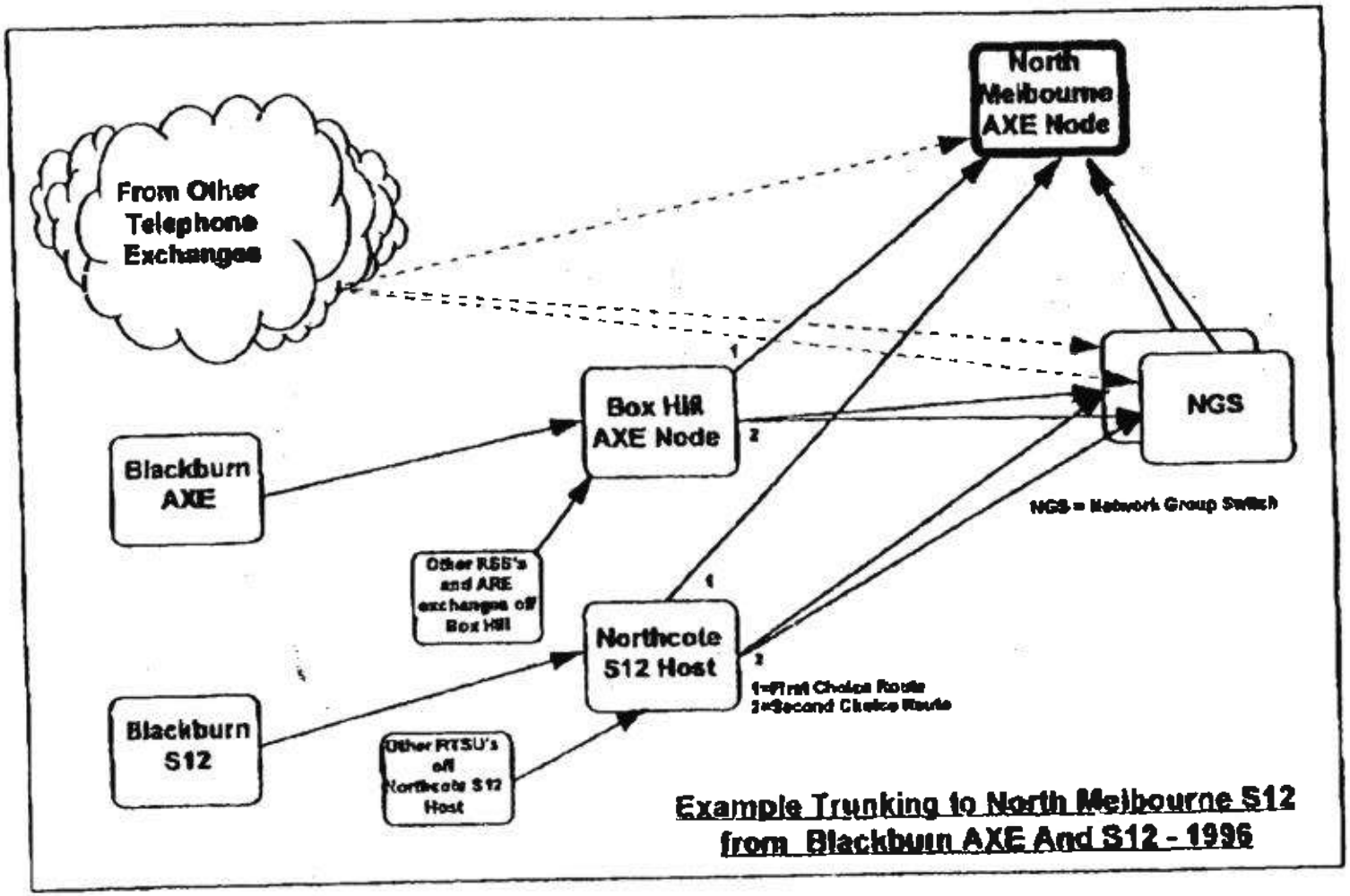

Figure 4

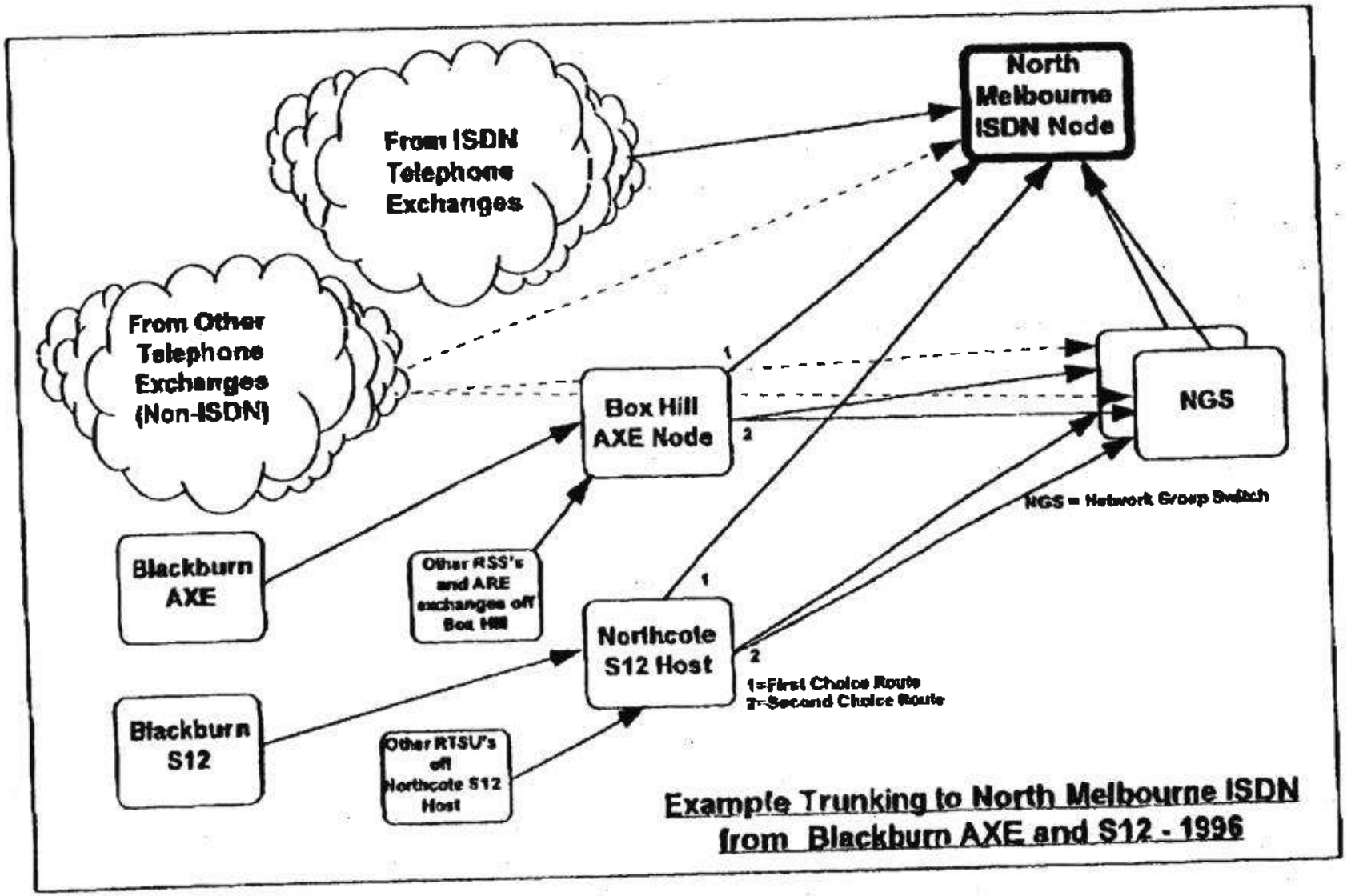

Figure 5