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**Telecom**  
AUSTRALIA

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Commercial & Consumer  
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18 March 1994

cc MR John MacMahon.

~~Mr Robin Davey  
Chairman  
AU/STEL  
5 Queens Road  
MELBOURNE VIC 3004~~

**F A X E D**

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Dear Mr Davey,

### **TAPE RECORDERS - USE IN LOCATING FAX FAULTS**

As you would be aware, Telecom has ceased the use of tape recorders in detecting service faults pending agreement on a new Privacy Policy and Voice Monitoring Guidelines.

However, it is evident that the cessation of tape recording may result in a lower level of customer service in respect of service faults with fax machines.

A number of national and cross divisional technical testing centres have been established in Melbourne, Sydney and Perth for the testing of fax machines. These testing centres undertake the technical testing of faults reported on fax machines and diagnose the fault condition and identify whether the fault is indicative of a network or CPE fault. The area is a difficult one given the need to distinguish between network and fax machine faults.

The standard procedure is for the customer to ring the test desk and send a test facsimile transmission to the test desk which records the handshake process and the related protocol information. This technical information is then replayed to an expert testing officer to diagnose the fault. For difficult faults the technical information may be further subjected to technical analysis in comparison against the standard protocol for that equipment.

In a small number of cases, where the customer indicates that the problem is specific to transmission between two particular facsimile machines then, with the consent of the customers controlling those facsimile machines, the test transmission between those facsimile machines will be taped and analysed.

In order to provide a high grade of customer service in this area the use of tape recorders is necessary.

In these cases, recording would be carried out in circumstances where:

- the customer's consent has been confirmed in writing by facsimile or otherwise;
- the recording would be of signals generated by a test message;
- there is no B party involved.

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In such a situation, Telecom considers there is no issue involving either the Telecommunications Interception Act or the States' Listening Devices Act. Also no privacy issue would seem to arise.

Nevertheless, Telecom considers that the formulation and application of guidelines would be advisable. These guidelines are attached for your information.

The Telecommunications Industry Ombudsman and the Privacy Commissioner have been advised in similar terms.

In testing fax protocols, the use of pip tones is impractical as it significantly interferes with the testing process. As well, Telecom's understanding of the relevant AUSTEL Technical Standard is that the use of pip tone is not required in testing for fax faults as described in this letter. For these reasons Telecom does not intend to use them unless it receives advice to the contrary.

Yours sincerely,

  
GROUP GENERAL MANAGER - CUSTOMER AFFAIRS

cc.