

C.o.T. Cases Australia

493-495 Queensberry Street

P.O. Box 313

North Melbourne VIC 3051

Telephone: (03) 9287 7095

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12 January, 1998

Our Ref: 3605.doc

Attention: Sue Laver
Telstra
By facsimile: 9832 0965.
Total pages (including this page) : 48.

file

Dear Ms Laver,

Re: C.o.T. Submission to the Chair of the Working Party.

Enclosed is a copy of C.o.T. submission sent to the Chairman of the Working Party.

Yours sincerely,


Graham Schorer
C.o.T. representative to the Working Party.

Benjamin
Armstrong
Kearney
Levy
Mounsher
Fitness

Holding Redlich - David Andrews

Freehills - Peter Butler / C. Thompson

L. Chusholm

L. Brown / M. Lean Deloitte / Dr. Hopkins
File.....SENATE ESTIMATES CORRESPONDENCE...

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12 January, 1998

Our Ref: 3598.doc

Attention: Mr John Wynack
Chair, Working Party
Senate ERCA Legislation Committee
By facsimile: (06) 249 7829.
Total pages (including this page) : 47.

FAXED
12/01/98

Dear Mr Wynack,

Re: Outcome of 16 December 1997 Working Party meeting.

Telstra's refusal to comply with the Working Party requests.

Both Ann Garms and myself have received, read and discussed the contents of the Transcript of the 16 December 1997 Working Party meeting. Our discussions have included Telstra's failure to positively apply themselves to the Working Party's Amended Terms of Reference (AToR) during the ten weeks the Working Party has been meeting.

We are both in agreement Telstra has, during the life of the Working Party, deliberately applied tactics to limit, delay or prevent discovery of information and documentation.

The information and documentation Telstra has refused to discover is the same information and documentation Telstra must discover to comply with the Senate Committee's AToR.

Mr Armstrong's failure to disclose his known non-availability to the Working Party was outrageous.

Telstra has engaged in conduct that has demonstrated its contempt for the existence and objectives of the Working Party. There are many individual people relying upon the Working Party meeting its obligations to the Senate Committee. The next instance of like Telstra conduct will require the Working Party to consider the need to request for the Senate Committee's intervention.

To avoid future misunderstanding or confusion, the C.o.T. Working Party representatives are clarifying with the Chairman the C.o.T. requirement for Telstra to immediately comply with Part 2, Point 3 of the AToR still exists.

With reason, the C.o.T. representatives assert it is essential that Telstra immediately comply with Part 2, Point 3 of the AToR, as it is the only starting point that will enable the Working Party to make progress.

The Chairman of the Working Party is formally requested by both C.o.T. representatives to again request Telstra immediately comply with Part 2, Point 3 of the AToR.

The Chairman's attention is drawn to the fact Telstra need to include in its written advice, to comply with the Committee's requirement under Part 2, Point 3 of the AToR, the following:-

- All of the changes made to the network or networks serving each Party that incurred during the total period of each Party's dispute, plus identify dates of all changes.

- Within each Party's customer catchment area i.e. *the geographical location in which the majority of each Party's customers reside*, list all those exchanges which had circuits directly linked to the exchanges nominated by each Party responding to the AToR.
- From within each Party's catchment area, list all:-
 - a) IDN entry and exit routes used by the PSTN network to transmit incoming calls to each Party's business telephone service.
 - b) IEN entry and exit routes used by the PSTN network to transmit incoming calls to each Party's business telephone service.
 - c) exit routes from the PSTN network into the ISDN network serving each Party's ISDN business telephone service.
 - d) types of exchanges involved in transmitting incoming calls to each Party's business.
 - e) major upgrades of those exchanges involved in transmitting incoming calls to each Party's business telephone service.

C.o.T. believe it is imperative for Telstra to be required to distribute this written advice to the Working Party representatives before the next Working Party meeting to enable C.o.T. representatives sufficient time to:-

- become fully conversant with the information contained within Telstra's written advice;
- converse with those people they represent about Telstra's written advice;
- prepare a list of subject matters to be included in the next Working Party meeting;
- prepare a list of questions to be answered by Telstra in the next meeting;
- prepare a list of matters and questions to be discussed with and put to the Working Party's independent Technical Telecommunications Consultant;
- determine if there are matters that require the Senate Committee's clarification or intervention.

The attached Appendix, by use of one example, sets out the reasons the C.o.T. representatives, reject Telstra's assertions the network diagrams partly comply with Part 2, Point 3 of the AToR. C.o.T. state the diagrams supplied to the Working Party do not, even in part, comply with the AToR.

Included in the attached Appendix are specific questions that need to be put to Telstra's Technical representative and the independent Technical Consultant to the Working Party.

Yours sincerely,



 ANN GARMS & GRAHAM SCHORER
 The C.o.T. Working Party Representatives.

APPENDIX.

Telstra and CoT/CoT Related Cases Working Party's Amended Terms of Reference (AToR) states, under Part 2, Point 3, "Telstra must provide written advice, in respect of each Party, identifying the network or networks which were used by Telstra to service the business telephone service of that Party."

During the Working Party meetings, Telstra provided the Working Party with network diagrams relating to each Party, which they assert complies with Part 2, Point 3 of the AToR.

The C.o.T. representatives to the Working Party have rejected Telstra's assertion on the basis it does not comply.

The example chosen to prove Telstra's network diagrams are defective and only partly identify the network or networks servicing each Party is the network information and diagrams related to Golden Messenger-G Schorer.

There are a number of facts that the reader needs to take into consideration about Golden's client base and the known changes within the Telstra network before addressing the C.o.T. comments about Telstra's network diagram and the reasons for C.o.T. rejection of Telstra's diagrams.

Point 1.

In early 1985, prior to the commencement of Golden's telephone service difficulties, problems and faults:-

- a. Golden's clients, who regularly used the company's services, were geographically located in the Greater Melbourne Metropolitan area.

The geographical boundaries of the Golden client catchment area are defined by the suburbs of Altona, Sunshine, Deer Park, St Albans, Tullamarine, Campbellfield, Thomastown, Greensborough, Lilydale, Kilsyth, Ferntree Gully, Rowville, Doveton and Frankston.

All of Golden's regular clients were located within Telstra's Melbourne (03) Metropolitan network.

- b. All of Golden's client job booking telephone lines were connected to Telstra's North Melbourne ARF analogue exchange.

Point 2.

Telstra documents state:-

In 1984, Telstra converted its Fortitude Valley ARF exchange into an ARE-11 exchange.

In May 1985, Telstra converted its North Melbourne ARF exchange into an ARE-11 exchange.

In mid-1985, Golden's customers started to experience serious telephone service difficulties, problems and faults in making telephone contact with Golden.

Point 3.**Telstra documents state:-**

In the early 1980's, Telstra began introducing the Integrated Digital Network (IDN).

In 1987, the IDN network comprised of approximately 15% of Telstra's network.

In 1987, Telstra introduced new routing rules to change the way traffic travelled through the network.

Pursuant to the new rules:

- a. traffic destined for the IDN was to be routed as early as possible into the IDN to keep the traffic in the digital network for as long as possible; and
- b. traffic originating in the IDN remained in the IDN as long as possible.

The reasons for the new routing rules were that Telstra considered keeping traffic in the IDN longer would:

- a. improve the quality of speech transmission;
- b. relieve the load on the analogue network (which was going to be phased out); and
- c. facilitate the eventual removal of the analogue network.

In order for the analogue network to meet these new rules, different 'IDN Entry' and/or 'IDN Exit' routes were established. Only one IDN Exit route was provided for any analogue exchange.

The IDN Exit route from Footscray AXE exchange ("FSRX") to North Melbourne analogue exchange ("NMEL") was established in 1988. Prior to this route being commissioned, digital traffic travelled to NMEL via the Exhibition and Windsor digital tandems.

When IDN routes were commissioned, there was congestion within these routes, most of which was in the IDN exit routes. The IDN entry routes, as far as congestion was concerned, were generally not as big a problem as the exit routes.

A lot of network congestion during this period of time was primary caused by a lack of junctions in the IDN exit routes coupled with what was a rapid modernisation and conversion to digitisation of the network.

The reason IDN exit route congestion was not remedied when first noticed was because Telstra, in those days, purchased this equipment in annual orders, which has to be finalised within six months of delivery of equipment. The equipment would then be installed and commissioned in the following twelve months. Consequently there was up to an eighteen months delay between ordering of equipment and its final commissioning.

Because of Telstra's equipment ordering installation and commissioning procedures, it was not possible for Telstra to remedy congestion in a short time frame.

In late 1992, Telstra applied these "new" rules relating to IDN entry and exit routes to the Fortitude Valley analogue exchanges.



Point 4.**Telstra documents state:-**

In 1983, Telstra began replacing analogue exchanges with digital AXE exchanges.

Digital AXE exchanges have a CL software blocks placed in front of their central processors. If these software blocks are underdimensioned, congestion will occur within the network and the exchange. This is evident by the network presenting symptoms to the caller and called party which can cause various types of customer complaints.

When CL software blocks are underdimensioned, symptom, if a CL record is not available, a telephone call through an AXE telephone exchange to an analogue destination affects other than congestion may also be evident.

In late 1988, the Melbourne division of National Network Investigations, in response to Golden's continuous complaints, discovered Telstra personnel responsible for network and exchange performance, were not aware of:-

- . existence of CL software blocks placed in front of digital AXE exchange central processors.
- . what the functions of CL software blocks did.
- . the need to measure if CL software blocks were underdimensioned.
- . how to measure if CL software blocks were underdimensioned.
- . their need to monitor performance of the CL software to maintain network performance.
- . how to measure network performance to detect underdimensioning within CL software.

Point 5.**Telstra documents state:-**

There was a systemic problem within Telstra's network that prevented Parties connected to analogue exchanges from receiving incoming calls when:-

- . the A Party, call originator, was using a certain types of Commander telephones (key telephone systems), and was connected to AXE exchange, and was ringing B Party, intended call receiver, who was connected to an analogue exchange.
- . the A Party, call originator, was using a certain types of Commander (key telephone systems), and the call used a route that encompassed an AXE exchange, and was ringing B Party, intended call receiver, who was connected to an analogue exchange.

Point 6.

Telstra had not provided documents to Bova, Honner and Plowman identifying the information contained in Points 2 to 5 of this Appendix.

Point 7.

Telstra personnel have stated to Ann Garms and/or Graham Schorer the following:-

The C.o.T. saga taught Telstra many things about how its management of the network was causing telephone service difficulty, problems and faults to the Parties intended to receive a telephone call.

The most important thing Telstra learnt was:-

Its management of the network was causing unnecessary congestion as a result of lack of consultation between the parties responsible for changing how traffic flows through the network.

Telstra had many cells of people responsible for monitoring performance of network routes. When each cell introduced changes as a result of performance measurements, where changes included reconfiguration of routes, redimensioning of routes, these cells of people were not communicating with one another about intending changes to be made to the network, or recent changes made to the network.

As a result of C.o.T. escalating complaints, Telstra initiated a major investigation. This investigation uncovered the work practices that was introducing congestion into the network.

Before the Telstra investigation, originally in Melbourne, there was over 30 cells of people performing such tasks. As a result of the Telstra investigation, Telstra reduced the number of cells to 5, plus introduced procedures that no changes could be made to the network until all 5 cells were consulted and agreement was reached on the proposed changes.

This work practice problem was nationwide, it did not just apply to Melbourne.

Point 8.

Reasons Telstra's network diagrams related to Golden Messenger-G Schorer are rejected by the C.o.T. representatives on the Working Party is that they do not identify:-

1. All of the network or networks that were used by Telstra to service the business telephone service of Golden during the total period of Golden's dispute with Telstra (which is from 1985 to 31 December 1996).
2. All changes within the network or networks that were used by Telstra to service the business telephone service of Golden during the total period of Golden's dispute with Telstra (which is from 1985 to 31 December 1996).
3. All of the exchanges within Golden's customer catchment area which had circuits linking directly into the North Melbourne (03) 329 ARF and ARE-11 analogue exchanges.
4. The number of circuits between all of the exchanges within Golden's customer catchment area which had circuits linking directly into the North Melbourne (03) 329 ARF and ARE-11 analogue exchanges.
5. All of the major upgrades to existing exchanges within Golden's customer catchment area which were used by Telstra to service Golden's business telephone, including the period of the upgrades.
6. All of the replacement of analogue exchanges to AXE and/or digital exchanges within Golden's customer catchment area which were used by Telstra to service Golden's business telephone, including the period of the upgrades.
7. All the IEN networks within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
8. All of the IEN network entry and exit routes within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
9. All of the changes made to the IEN network within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
10. All of the IDN networks within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
11. All of the IDN network entry and exit routes within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
12. All of the changes made to the IDN network within Golden's customer catchment area which were used by Telstra to service Golden's business telephone.
13. All of the exit routes from Telstra PSTN network within Golden's customer catchment area which were used by Telstra to service Golden's ISDN business telephone.

SPECIFIC COMMENTS ABOUT EACH NETWORK DIAGRAM. (Copies enclosed.)**Point 9.****Re: Network Configuration at 1985 - (Telstra's Appendix 1, Figure 1).**

This diagram does not identify:-

- a) at what period in 1985 this network diagram relates to.
- b) the number and type of changes that took place between 1985 and 1992, that occurred within Golden's customer catchment area, within the network or networks that were used by Telstra to service Golden's business in North Melbourne.
- c) the network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARF analogue exchange.
- d) the type of exchanges within the type of network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARF analogue exchange.
- e) the network information identified in Points 3, 4, 7 & 8 of this Appendix.
- f) the network configuration when the North Melbourne (03) 329 exchange was an ARF analogue exchange in early 1985.
- g) the number of direct circuits from Blackburn ARE to North Melbourne ARE-11.
- h) the number of circuits in the second and third choice routes from Blackburn to North Melbourne.

Point 10.**Re: Network Configuration at 1992 - (Telstra's Appendix 1, Figure 2).**

This diagram does not identify:-

- a) at what period in 1992 this network diagram relates to.
- b) the number and type of changes that took place between 1985 and 1992, that occurred within Golden's customer catchment area, within the network or networks that were used by Telstra to service Golden's business in North Melbourne.
- c) the network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne.
- d) the type of exchanges within the type of network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne.
- e) the network information identified in Points 3, 4, 7 & 8 of this Appendix.
- f) the number of direct circuits from Blackburn ARE to North Melbourne ARE-11.



- g) the number of circuits in the second and third choice routes from Blackburn to North Melbourne.
- h) the IEN and/or IDN networks, including the location of their entry and exit routes used by Telstra to service Golden's business in North Melbourne.

Point 11.

Re: Network Configuration at 1993 - (Telstra's Appendix 1, Figure 3).

This diagram does not identify:-

- a) at what period in 1993 this network diagram relates to.
- b) the number and type of changes that took place between 1992 and 1993, that occurred within Golden's customer catchment area, within the network or networks that were used by Telstra to service Golden's business in North Melbourne.
- c) the network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARE analogue exchange.
- d) the type of exchanges within the type of network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARE analogue exchange.
- e) the network information identified in Points 3, 4, 7 & 8 of this Appendix.
- f) the network configuration from Blackburn to North Melbourne when the North Melbourne (03) 329 exchange was an ARE analogue exchange.
- g) the number of direct circuits from Blackburn ARE to North Melbourne ARE-11.
- h) the number of circuits in the second and third choice routes from Blackburn to North Melbourne.
- i) the IEN or IDN networks used by Telstra to service Golden's business in North Melbourne.

Point 12.

Re: Network Configuration at 1996 - (Telstra's Appendix 1, Figure 4).

This diagram does not identify:-

- a) at what period in 1996 this network diagram relates to.
- b) the number and type of changes that took place between 1993 and 1996, that occurred within Golden's customer catchment area, within the network or networks that were used by Telstra to service Golden's business in North Melbourne.
- c) the network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARE analogue exchange.

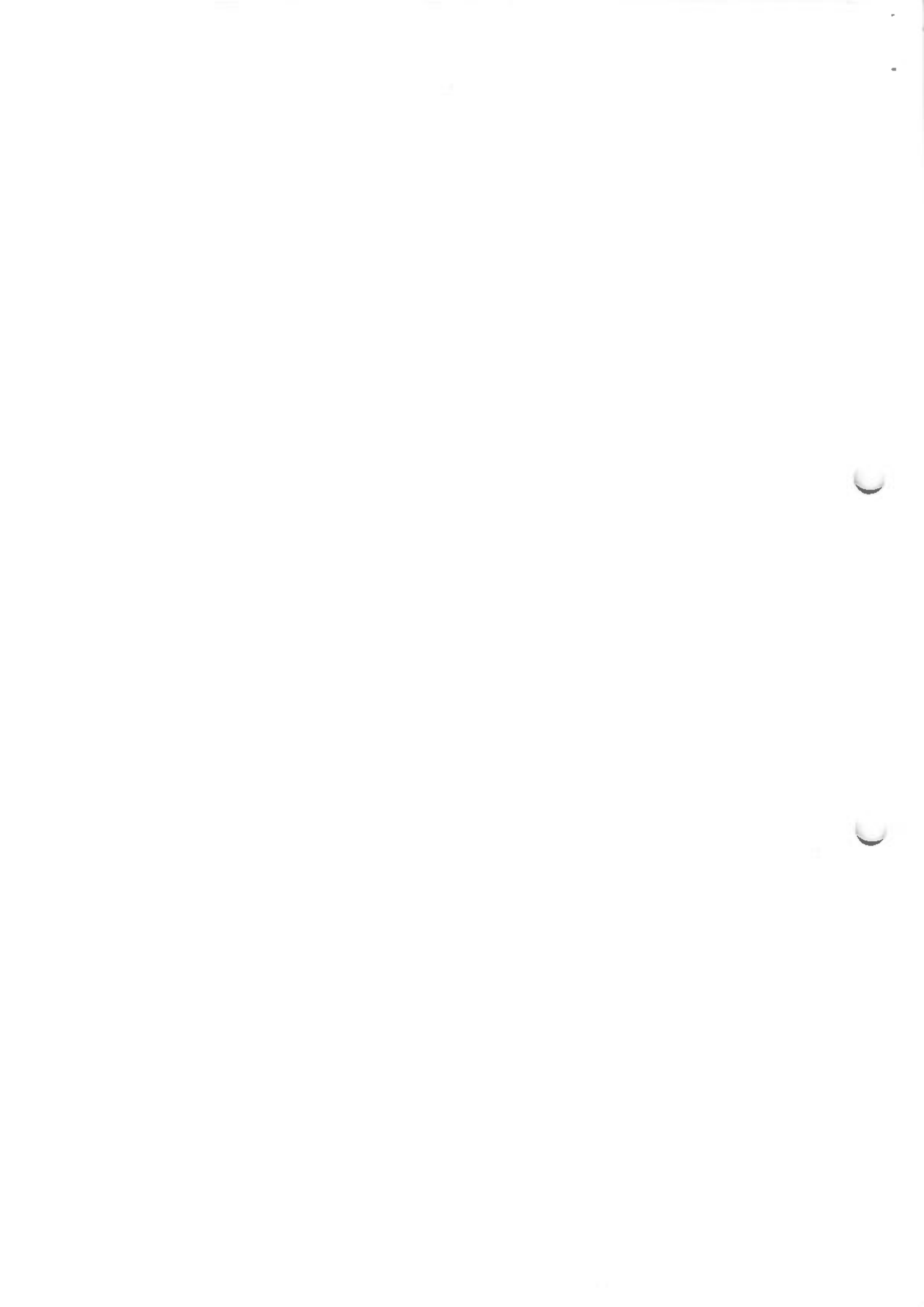
- d) the type of exchanges within the type of network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's business in North Melbourne when the North Melbourne exchange was an ARE analogue exchange.
- e) the network information identified in Points 3, 4, 7 & 8 of this Appendix.
- f) the network configuration from Blackburn to North Melbourne when the North Melbourne (03) 329 exchange was an ARE analogue exchange.
- g) the number of direct circuits from Blackburn ARE to North Melbourne ARE-11.
- h) the number of circuits in the second and third choice routes from Blackburn to North Melbourne.
- i) the IEN or IDN networks used by Telstra to service Golden's business in North Melbourne.

Point 13.

Re: Network Configuration at 1996 - (Telstra's Appendix 1, Figure 5).

This diagram does not identify:-

- a) at what period in 1996 this network diagram relates to.
- b) the number and type of changes that took place between 1992 and 1996, that occurred within Golden's customer catchment area, within the network or networks that were used by Telstra to service Golden's ISDN business telephone in North Melbourne.
- c) the network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's ISDN business telephone.
- d) the type of exchanges within the type of network or networks configuration within Golden's customer catchment area which was used by Telstra to service Golden's ISDN business telephone.
- e) the network information identified in Points 3, 4, 7 & 8 of this Appendix.
- f) the number of direct circuits from Blackburn ARE to North Melbourne ARE-11.
- g) the number of circuits in the second and third choice routes from Blackburn to North Melbourne.
- h) the IEN or IDN networks used by Telstra to service Golden's ISDN business telephone.



QUESTIONS TO BE PUT TO TELSTRA'S TECHNICAL REPRESENTATIVE AND THE INDEPENDENT TECHNICAL CONSULTANT APPOINTED TO THE WORKING PARTY:

As Telstra had a duty of care to review the procedures, functions, monitoring results and analytical results, including making inquiries of the departments responsible for network performance, all of which are identified within the C.o.T. provided Extracts from Telstra's Network Products, Network Operations Directory, when responding to the nature, type and frequency of complaints lodged with it about telephone service difficulty, problems and faults by C.o.T. and C.o.T. Related Cases,

one of the questions put to both Technical persons on the Working Party is:-

Which of the procedures, functions, monitoring results, analytical results, departments identified in the C.o.T. provided Extracts from Telstra's Directory are not applicable in relationship to identify:-

- reasonable causal link within Telstra's network to the telephone service difficulty, problems and faults experienced by C.o.T. and C.o.T. Related Cases?
- the extent of the causal link to call losses experienced by C.o.T. and C.o.T. Related Cases?
- the consequential losses experienced by C.o.T. and C.o.T. Related Cases as a result of Telstra misinforming the customers of C.o.T. as to the reasons why they were unable to make successful telephone contact?
- the consequential losses experienced by C.o.T. and C.o.T. Related Cases as a result of Telstra misinforming C.o.T. as to the reasons why their customers were unable to make successful telephone contact?

The C.o.T. provided Extracts number 168 separate categories contained within 9 pages, copy enclosed.

The second question to both the Technical personnel is:-

- a) How will they identify that the Telstra personnel responsible for network and exchange performance did not monitor and test for underdimensioning within the CL software blocks placed in front of digital exchanges' central processors?
- b) The extent of the CL software problem and its resultant effect on C.o.T. and C.o.T. Related Cases' inability to receive incoming telephone calls?
- c) The total period of time the CL software problem impacted upon C.o.T. and C.o.T. Related Cases' inability to receive incoming telephone calls?

The third question to both the Technical personnel is:-

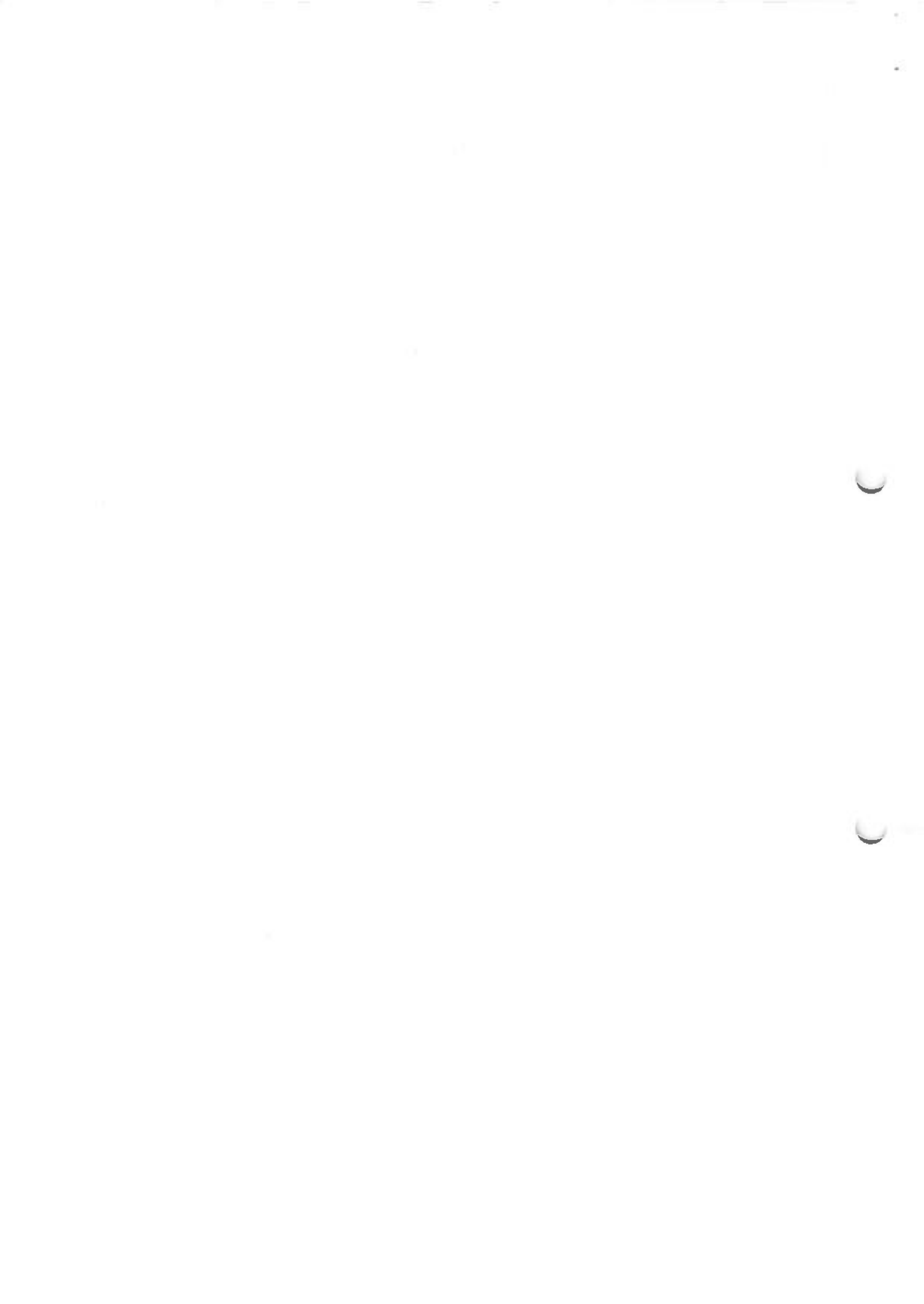
- a) How will they identify the existence and the extent of systemic problem within Telstra's network that prevented Parties connected to analogue exchanges from receiving incoming calls when:-
 - the A Party, call originator, was using a certain types of Commander telephones (key telephone systems), and was connected to AXE exchange, and was ringing B Party, intended call receiver, who was connected to an analogue exchange.
 - the A Party, call originator, was using a certain types of Commander (key telephone systems), and the call used a route that encompassed an AXE exchange, and was ringing B Party, intended call receiver, who was connected to an analogue exchange.

b) The resultant impact upon the C.o.T. and C.o.T. Related Cases' inability to receive incoming telephone calls?

The fourth question to both the Technical personnel is:-

How will they go about proving or disproving the C.o.T. assertion, placed in writing, that parts of the November 1993 Bell Canada International Report is fabricated or falsified?

Enclosed are the 168 listings extracted from Telstra's Directory of Network Products and Network Operations, plus C.o.T.'s written explanation, which alleges to prove that parts of the November 1993 Bell Canada International Report is fabricated or falsified?



Extracts from Telstra's Directory of Network Products, Network Operations, Implemented December 1994,

A to K, 20 October 1994,
L to Z, 16 November 1994,

Identifying Telstra Departments, procedures, functions, monitoring and testing programs, plus analytical programs used to maintain, rectify and improve network performance.

	CODE	DESCRIPTION
1	AAT [1]	Arbitrated Access Timer (LDDI)
2	ABD	Average Business Day - traffic measurement
3	ABH	Average Busy Hour
4	ABL	Auto blocked
5	ABMA	Marker Relay Set
6	ABR	Answer Bid Ratio - ratio of answered bids to all call bids offered - may be measured at various points in the network - see also ASR
7	AC [1]	Access Cluster (FASTPAC)
8	ACCADS	Alarm Collection Control and Display System - collects data from transmission switching & radio equipment for transmission to central sites and to AMS
9	ACCS [2]	Access module digital Used to establish a connection from maintenance equipment to subscriber lines.
10	ACM [2]	Answered Call Monitor The Answered Call Monitor is a personal computer based test system for monitoring calls either: <ul style="list-style-type: none"> . Generated by the tester itself . Generated by other call generating devices or . Generated by a customer
11	ADC [2]	Analogue to Digital Converter
12	ADR	Automatic Disturbance Recorder - a device or aid to continuously monitor the exchange's common control devices using RKR's which pass on faults experienced in the setting up or the switching progression of a call (for ARF ARM) - see also ADX
13	ADRAN	Automatic Disturbance Record Analysis
14	ADRUP	Program for sorting ADR data
15	ADTD	All Day Traffic Distribution
16	ADX	Automatic Disturbance Exchange - transfers ADR call failure messages to SPINE - currently also used to transfer ARE.NCS data (to be transferred via SUPERSORTER when message format changes in June 1992)
17	AFHG	Alarm & Fault Handling Group