BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition on Behalf of)
CITIZENS OF THE STATE FLORIDA to)
Initiate Investigation into)
Integrity of SOUTHERN BELL)   DOCKET NO. 910163-TL
TELEPHONE& TELEGRAPH COMPANY'S)
Repair Service Activities and)
Reports.)
_____)

DEPOSITION OF: KATHLEEN GARGIULO and
                             KATHRYN MILLER

TAKEN AT THE INSTANCE OF: Office of Public Counsel

DATE: Friday, November 6, 1992

TIME: Commenced at 11:00 a.m.
                             Concluded at 3:30 p.m.

PLACE: 101 East Gaines Street
                             Tallahassee, Florida

REPORTED BY: JANE FAUROT
                             Notary Public in and for the
                             State of Florida at Large

ACCURATE STENOTYPE REPORTERS, INC.
100 SALEM COURT
TALLAHASSEE, FLORIDA 32301
(904) 878-2221

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APPEARANCES:

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

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REPRESENTING SOUTHERN BELL TELEPHONE & TELEGRAPH
COMPANY:

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REPRESENTING THE COMMISSION STAFF:

JEAN WILSON, ESQUIRE
Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32334

ALSO PRESENT:

WALT BAER, Office of Public Counsel.

STAN GREER, FPSC Division of Communications.

CARL VINSON, JR., FPSC Division of Auditing and
Financial Analysis.

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S T I P U L A T I O N S

The following deposition of KATHLEEN GARGIULO and KATHRYN MILLER was taken on oral examination, pursuant to notice, for purposes of discovery, for use in evidence, and for such other uses and purposes as may be permitted by the Florida Rules of Civil Procedure and other applicable law. Reading and signing of said deposition by the witnesses is not waived. All objections, except as to the form of the question, are reserved until final hearing in this cause; and notice of filing is waived.

* * * * * * *

Thereupon,

KATHLEEN GARGIULO and

KATHRYN MILLER

were called as witnesses, and having been first duly sworn, were examined and testified as follows:

MS. RICHARDSON: Today is a deposition of both Kathleen Gargiulo and Ms. Kathryn Miller from Southern Bell. My name is Sue Richardson, I'm representing the Office of Public Counsel, and with me will be Walt Baer.

MS. WILSON: I'm Jean Wilson, I represent the Staff of the Florida Public Service Commission, and with me here today are Stan Greer and Carl Vinson, two members of the Commission Staff.

1   MR. CARVER: My name is Phillip Carver, and I

2   represent Southern Bell. If we are through with

3   appearances, I have a brief statement I want to put on.

4   It's the usual stuff.

5   MS. RICHARDSON: All right.

6   MR. CARVER: This is just the same stipulations

7   that we typically put on at the beginning of all the

8   depositions.

9   MS. RICHARDSON: Fine.

10   MR. CARVER: Basically, I just wanted to note that

11   we stipulate to proper notice, we have no objection to

12   the time or to the place. I would note that the notice

13   does not list them as corporate representatives to

14   testify on a designated area of inquiry, but rather

15   they are noticed by name, so for that reason the

16   inquiry can cover anything that's related to the

17   docket. I would ask, though, that all the parties go

18   ahead and ask whatever questions they might have today

19   so that we can obviate any need to have these witnesses

20   back again in the docket later. We also stipulate that

21   all objections are preserved except those relating to

22   the form of the question. We do not waive reading and

23   signing. And the last thing, I just want to put on the

24   record is not a stipulation, but rather a statement,

25   which is that there was an internal investigation done

1   at Southern Bell by the Legal Department that had to do

2   with certain issues that are relative to this docket.

3   We have taken the position that that investigation and

4   the work product that came out of it is all protected

5   by the attorney/client privilege and work product

6   privilege, so we will object to any questions that get

7   into that area and instruct the witnesses not to answer

8   anything that relates to that investigation. And

9   that's about all I've got. We are all in agreement on

10   the stipulations?

11   MS. RICHARDSON: Yes.

12   MS. WILSON: Well, to the extent the witness

13   refuses to answer a question based on privilege, and

14   that is later ruled on by the Commission, there is a

15   possibility these individuals may be subject to

16   deposition again, but with that understanding.

17   MR. CARVER: Yes, that's fine. And all I was

18   getting at with my earlier statement was I just wanted

19   us to go ahead and cover everything with them today as

20   opposed to doing, you know, one area today and another

21   area later or whatever. I want to cut down on the

22   number of times they have to come here from Fort

23   Lauderdale and Birmingham, respectively.

24   MS. RICHARDSON: I guess I just have one, if

25   something new comes up in further discovery or whatever

1   that we don't have at present that we weren't aware of,

2   then that may obviate the need to talk to them again.

3   But we will attempt to do that down there in their

4   area, if that would be any problem.

5   MR. CARVER: Okay. We will just have to play it

6   by ear.

7   MS. RICHARDSON: Did you have anything you wanted

8   to say for the record?

9   MS. WILSON: No.

10   DIRECT EXAMINATION

11 BY MS. RICHARDSON:

12   Q   If we can start, I have just got a

13 hot-off-the-press copy this morning of the deposition

14 that we began with you, Ms. Gargiulo, and I haven't had

15 a chance to look at it. So some of these questions may

16 be repetitive, and if they are, I apologize. But if we

17 could just go ahead and do them again, if that's okay

18 with you. First of all, I would like you to start for

19 the purposes of this deposition to state your name and

20 spell it for the court reporter to make sure she has it

21 correctly?

22   A   It's Kathleen Gargiulo, the first name

23 K-A-T-H-L-E-E-N, the last name G-A-R-G-I-U-L-O.

24   Q   And your title, please?

25   A   I'm Manager of the Quality Assurance Specialist

1   Unit in Fort Lauderdale.

2   Q   And if you could give us your business address?

3   A   6451 North Federal Highway, Room 815 in Fort

4   Lauderdale, 33308.

5   Q   And your phone number?

6   A   305-492-3571.

7   Q   And, Ms. Miller, if you would state your name and

8   spell it for the court reporter?

9   A   (By Ms. Miller) Kathryn Miller, K-A-T-H-R-Y-N,

10   M-I-L-L-E-R.

11   Q   And your address, please?

12   A   Okay, that is 1876 Data Drive, Birmingham,

13   Alabama, 35244, and the room number is Room N-206A.

14   Q   And the zip for Birmingham?

15   A   35244 for that building.

16   Q   And your phone number, please?

17   A   205-988-1566.

18   Q   And your title?

19   A   Staff Manager, Billing Management.

20   Q   If we could begin, Ms. Gargiulo, would you please

21   explain what your present duties are?

22   A   (By Ms. Gargiulo) I'm manager over the quality

23   assurance specialist unit, as I stated, which has 60 service

24   representatives, and assistant managers and chiefs, and we

25   handle all reconciliation, billing reconciliation issues.

1   any conversions that might go on involving changes in

2   procedures, we would try to handle that. We also will be

3   working on the settlement that just came about, the Attorney

4   General settlement. All the letters that are sent out to

5   the customers with the refunds, the customers will call us

6   if they have any questions on those. We are also handling

7   any customers who claim they have services on their records

8   that they did not order, we are arranging for the credits on

9   those. We also handle MOOSA, Manual Handling Reports.

10   Q   Does that have a particular form number?

11   A   No.

12   Q   Ms. Miller, could I please have a general

13   description of your job duties?

14   A   (By Ms. Miller) Okay. Billing Management is a

15   portion of the Comptroller's Department, and we serve as

16   support for the revenue offices in the nine-state area of

17   BellSouth. We issue documentation, and we do training, and

18   we serve as a liaison between Comptrollers and the

19   information systems department.

20   Q   Could you clarify for me a little bit, I mean,

21   that's a nice brief description of liaison between the

22   Comptroller's and information systems, I'm not quite sure

23   what all that involves. Could you explain or expand on

24   that?

25   A   In general, what it means is the information

1　systems are the programmers that write the computer

2　programs, and the people in the revenue office are the ones

3　that run those programs and handle the output prints. And

4　so sometimes we issue procedures on how they handle the

5　outputs, printouts and how they input things to the system

6　and things like that. Does that help?

7　　　　Q　　It helps a little bit. So if we are talking

8　about, for instance, the BellSouth CRIS user guide, would

9　that be something that you would be involved in?

10　　　　A　　Yes.

11　　　　Q　　And, Ms. Gargiulo, how long have you been in your

12　present position?

13　　　　A　　(By Ms. Gargiulo) Since the first of October.

14　　　　Q　　And what did you do prior to that?

15　　　　A　　I was an assistant staff manager on the customer

16　services staff for the State of Florida. Mainly I handled

17　questions regarding business type accounts. I also was the

18　MOOSA coordinator for the state, and I did other duties

19　requested by the general manager; tracking of results,

20　things of that sort.

21　　　　Q　　What kind of results?

22　　　　A　　All results; attendance, collections, sales, all

23　the internal results that we have, and just tracking them

24　for the general manager.

25　　　　Q　　Okay. And, Ms. Miller, also for you, how long

1   have you held your present position?

2   A   (By Ms. Miller) Since July of '91, when the

3   department was formed.

4   Q   Do you know why the department was formed in July

5   of '91, what the purpose was?

6   A   To provide support in the area of documentation,

7   which before that had been handled by information systems.

8   Q   Well, why not just leave it with information

9   systems?

10   A   Because a good job was not done.

11   Q   How did they find out that a good job wasn't being

12   done?

13   A   That's really --

14   Q   Do you know?

15   A   No, I don't know. It had been under study for a

16   long time, I think.

17   Q   Has there been any review of this new branch, this

18   new department to see whether or not the job is being done

19   better now?

20   A   Not that I know of.

21   Q   What did you do prior to July of '91?

22   A   I was in information systems, and I was primarily

23   a programmer, except in the most recent maybe two or three

24   years. Prior to '91 I was working on the team to

25   regionalize the CRIS system between Southern Bell and South

1   Central Bell, so I was not programming, however, I was

2   coordinating things.

3   Q   And was that the regionalization team that

4   involved the MOOSA area?

5   A   It did include that, yes. It was much larger than

6   that, but it included MOOSA.

7   Q   When you say programmer, does that mean that you

8   actually wrote software for the information systems?

9   A   Yes.

10   Q   And did any of that software involve MOOSA and

11   LMOS?

12   A   No.

13   Q   What software, what areas, what systems did you

14   function in?

15   A   I was in the CRIS system, in general customer

16   record information system. But I did not write any of the

17   MOOSA software. I was in a coordination role at that point.

18   Q   Was any of that MOOSA software run past you in

19   terms of an analytical or a review type?

20   A   Yes.

21   Q   So even though you didn't write it, you were

22   within the review process, the development process?

23   A   Yes.

24   Q   From this point on I'm going to pretty much, I

25   think, just direct a question and let either one of you or

1 both answer that question. If there is something that I

2 feel, you know, I'd like to specifically direct, then I'll

3 ask one of you or the other to answer. But other than that,

4 if you will just both maybe coordinate what you do, that

5 would probably speed us along a little bit, especially since

6 I'm taking so much time writing notes.

7   Can you tell me what happens when there is an

8 error in the MOOSA program that insures a customer gets a

9 rebate? And I would like that responded to in terms of 1990

10 and then in terms of 1992. I would like a clear distinction

11 made, before the recent changes and after the recent

12 changes. And '92 may be the wrong number, if it is

13 September '91 that the recent changes to MOOSA became about,

14 but whatever. But before the new changes and after the new

15 changes.

16   MR. CARVER: I am going to object to the form of

17   the question. If you understood that go ahead.

18   MS. MILLER: I didn't understand the question.

19 BY MS. RICHARDSON:

20   Q   Well, let me start again, then. I'm trying to

21 distinguish here, okay? Have there recently been a number

22 of changes to the MOOSA system and MOOSA programing and how

23 it handles reports?

24   A   (By Ms. Miller) There were some made in September

25 of '91.

1   Q   Okay. Then prior to September of '91, can you

2 please tell me how an error, an error report, if there was

3 an error found in the MOOSA program, how that was handled to

4 make sure the customer received a rebate?

5   MR. CARVER: I'm going to object to the

6   characterization that there is an error in the program.

7   You can answer.

8   MS. GARGIULO: I don't know that I can. Repeat it

9   again for me.

10 BY MS. RICHARDSON:

11   Q   Okay. What happens when there is an error in the

12 MOOSA program to ensure that the customer gets a rebate?

13   A   (By Ms. Gargiulo) We would have to determine what

14 the error is and then go from there.

15   Q   Is there a process for determining, or for trying

16 to look for errors to determine that there are some or are

17 not any?

18   A   (By Ms. Miller) The process would be what error

19 code was given and what does that mean and what needs to be

20 corrected because of what the error code was.

21   Q   I'm going to come back to that. Let's get to a

22 specific handout, if we could. And I believe you have this

23 one, it was our Exhibit 2.

24   And if it's all right with you, I think we will

25 just start over and make this now Exhibit 1 for this

1   particular deposition.

2   (Exhibit Number 1 marked for identification.)

3   BY MS. RICHARDSON:

4   Ms. Gargiulo, are you familiar with this document

5   at all?

6   A   (By Ms. Gargiulo) No.

7   Q   Ms. Miller, are you familiar with this document?

8   A   (By Ms. Miller) Yes.

9   Q   Can you tell me what the purpose -- and this

10   Exhibit 1 is titled BellSouth CRIS user guide, Section 41,

11   MOOSA. Ms. Miller, can you tell me then what the purpose of

12   this particular document is?

13   A   This document was written to be used by the

14   Comptroller's revenue accounting offices. Its purpose was

15   intended to describe MOOSA in as much detail at they needed,

16   and to tell them, the people in the revenue offices, how to

17   handle their portion of the error handling procedures.

18   Q   Okay. Can you tell me how it is used then by

19   those individuals?

20   A   On a day-to-day basis it's probably not used,

21   because they know what they do and they do it every day.

22   However, it is their back-up documentation for what they do,

23   and they can refer to it or use it for training if they were

24   to have a new person to come in to work on it that had no

25   understanding of MOOSA.

1   Q   Would you look at the first page there under CRIS

2 processing, 1.03?

3   A   Okay.

4   Q   Can you tell me how does a file pass from LMOS to

5 CRIS?

6   A   I don't have any direct knowledge of the LMOS part

7 of this. However, I do know that a file is provided each

8 working day. I couldn't even tell what you kind of file it

9 was, I don't know if it is on tape, or disk, or what, but

10 one comes in every day from LMOS. And the CRIS job is set

11 up to receive it. And it reads it in if it is there; and it

12 doesn't read it in if it is not there.

13   Q   So it's sent over through a system of computer

14 software as data instead of hard paper format?

15   A   Yes, it's data.

16   Q   And does the customer get a rebate when a service

17 is not connected by the due date, do you know?

18   A   I don't understand the question.

19   Q   We have got under 1.03 certain edits, edit and

20 validate activities?

21   A   Uh-huh.

22   Q   And under that we have got H211, MOOSA account not

23 found, multi-line account, activity to a stub, MOOSA account

24 not live, MOOSA customer code not found. Perhaps if you

25 could just briefly first explain what each one of those is,

1 and maybe my question would be easier, or I can toss my

2 question out.

3   A   Okay. The file that is sent by LMOS to CRIS has

4 to be edited. These are the errors that could result from

5 that editing process, all right. Multi-line account

6 specifically means that the account number that LMOS sent

7 us, the record for, is an account, a customer's telephone

8 account that has more than one line on it. Multi-line

9 accounts are not handled mechanically by MOOSA, therefore,

10 they will be errored out. Activity to a stub means that the

11 activity from LMOS was not sent to the main account number,

12 it was sent on one of the other lines that happens to belong

13 to that customer. You cannot work it that way, it has to be

14 sent to the main account number, so it's errored out, all

15 right. MOOSA account not found means we received a piece of

16 activity from LMOS, and when we went to look for that

17 account on the CRIS data base the account was not there,

18 therefore, we cannot give a credit if the account is not

19 there. Perhaps somebody typed it in wrong or something.

20   Q   In the name or in the phone number?

21   A   The phone number.

22   Q   It checks for the phone number?

23   A   Yes, it's the account number. Okay. The next

24 one, MOOSA customer code not found, means that the account

25 number was there, but the customer code which makes this

1   customer unique was not there.

2   Q   All right. Now, what customer code is that, then?

3   I'm with you on the telephone number, okay, and when you say

4   customer code that is unique to the customer, I'm not sure

5   what you're speaking of?

6   A   The customer code is a three-digit suffix to the

7   end of the customer's telephone number that uniquely

8   identifies this person as having this telephone number as

9   opposed to that person that had it three years ago, for

10   example.

11   Q   So every time a new service is installed, that

12   customer code gets changed. If it is a number that has been

13   used before --

14   A   That's correct.

15   Q   -- then that customer's three-digit or alpha

16   suffix gets dropped and a new one put on?

17   A   That's correct. So this means that the account

18   number was there, but the customer code did not match.   The

19   last one, MOOSA account not live, means that the account

20   number was there, the customer code was there, but the

21   account has been disconnected, therefore, it's not a live

22   account that is currently billing.

23   Q   All right. Now, if I have a customer who has

24   ordered brand new service, and that customer calls up and

25   says, "I don't have dial tone, my line is dead."   What

1   happens? I mean, that's from the LMOS, and it shows up as

2   an out of service, and it comes across, does it error out in

3   any one of these errors in CRIS?

4   A   (By Ms. Gargiulo) It would probably error out to

5   account not found if it was the same day.

6   Q   Now then, now that we have got an error code

7   labeled with this one, can you tell me would a customer get

8   a rebate if his service was due the day, that morning, and

9   he called in as being out of service, do you know whether or

10   not he would get a rebate?

11   A   If the order for the service is completed on that

12   day then, yes, he would get a rebate. But the order may not

13   have completed, which is why he did not have service. So

14   then, therefore, he wouldn't get a rebate because we would

15   not have started to bill him.

16   Q   Can you look at 1.04 on this page for me now.

17   A   (By Ms. Miller) Okay.

18   Q   Can you tell me what the purpose is of tying a

19   MOOSA trigger record from LMOS to a service order, why tie a

20   MOOSA trigger record from LMOS to a service order?

21   A   I don't understand how 1.04 implies that it does.

22   Q   Well, I've got update service order activity. Why

23   don't we start then with explain to me what 1.04 does say,

24   because I'm obviously not reading it correctly?

25   A   Okay. The number RF20B25 is the program's name,

1   okay, update service order activity is the name of that job,

2   okay?

3   Q   Okay.

4   A   So that's the name of a computer program, update

5   service order activity, and it's job number is RF20B25.

6   What this is saying is that the LMOS file comes into CRIS

7   and it gets to this particular job, this computer job. I

8   see what you are saying, that phrase along with all service

9   or activities. This is the computer job that updates all

10   activity that comes into CRIS every night. So anything that

11   is going to get to a customer's account has to come through

12   this job, okay?

13   Q   Okay.

14   A   That phrase is merely incidental, along with all

15   service order activity.

16   Q   Well, then if I understand what you're saying,

17   MOOSA triggers come in from one place, new service orders

18   come in from another place, but both of them join up in

19   RF20B25 and get funneled together into one CRIS account?

20   A   They actually join up before that, but, yes,

21   that's the essence of it.

22   Q   So they are not really together with to begin

23   with?

24   A   No.

25   Q   It's just they are squeezed together by this

1 particular program?

2   A   There is more than one source of input for CRIS,

3 and those are two of the possible sources, and they all end

4 up coming through this job, yes.

5   Q   Can you look at 1.05 for me then, now.

6   A   Okay.

7   Q   Before I ask my question I think what I'm going to

8 do is have you just go through and explain that to me, if

9 you could, just 1.05 like you did with 1.04. If you will

10 take me through it step-by-step then I will know whether my

11 question has any sense behind it or not.

12   A   This next job, RF35B20, is merely another job in

13 the CRIS cycle, okay? The MOOSA activity that came in from

14 LMOS and that went through the job that we mentioned in

15 1.04, eventually gets to this job, RF35B20, and all this

16 paragraph is trying to say is that this job does two things.

17 First of all, it gets ahold of all of the ones that have got

18 one of these errors, these edit errors we mentioned earlier,

19 and it separates them from everything else that did not get

20 any errors. The ones that were errored out are all over

21 here by themselves, and this job does that. It puts them

22 over there by themselves. The other thing it does is it

23 counts these totals that go out on Form MP-403-M, this just

24 says how many came in and how many got errored out that day

25 from LMOS.

1   Q   And that is exactly what that paragraph is telling

2   me, then, that's all it's talking about?

3   A   Right.

4   Q   Okay. It does something with a list of service

5   orders, too, though, doesn't it?

6   A   Well, that other stuff is really sort of

7   incidental. This job RF35B20 puts out lots of reports. One

8   of the reports it puts out says everything that was

9   completed. One of the other reports it puts out says

10   everything that was not completed. The last half of this

11   paragraph is attempting to say that since the MOOSA activity

12   came in, it will go out either on the completed or not

13   completed report, depending on whether it got an error or

14   not.

15   Q   And that's, again, like 1.04, that is separate and

16   distinct from the service orders that are completed or not

17   completed, the MOOSA trigger is really --

18   A   It's a separate thing, but, yes, the Form MP-404,

19   service orders and miscellaneous input, which the MOOSA

20   stuff is miscellaneous input, everything that is completed

21   comes out on the same report.

22   Q   And does the report separate them, like the first

23   part of the report talks about incompleted service orders,

24   and then it has a page break or something, and the second

25   part talks about incompleted MOOSAs, the error triggers?

1   A   I don't know the answer to that.

2   Q   But they are not squished together?

3   A   You can tell which one is which. I don't know if

4 they are separated, but you can tell which one is which.

5   Q   Can you explain to me what the MO originator ID

6 is, I think in the bottom of that paragraph?

7   A   Everything that comes into CRIS that is not a

8 service order basically falls under the general heading of

9 miscellaneous input. Miscellaneous input has a two-digit

10 code on it saying who put it in, and the MO means this is

11 something that came from LMOS.

12   Q   So if I'm going to look at MP-404 or MP-406, and I

13 see an MO on there, then I can identify that as a report

14 that came out of LMOS?

15   A   No, not exactly. You can identify that that piece

16 of input originally came from LMOS, and it is now appearing

17 on this report. It identifies the origin of it.

18   Q   Then let me ask one further follow-up question.

19 In LMOS is there an origin other than service orders and

20 repair trouble reports? I mean, that the MO might apply to?

21   A   The MO just applies to trouble reports from LMOS.

22   Q   Only trouble reports. All right, now let's move

23 on down to 1.06.

24   A   Okay.

25   Q   And if you would just go through that one, too. I

1 think I'm probably going to do that rather than try to ask

2 you specific questions, because this is very hard for me to

3 comprehend.

4   A   Okay. Job RF57B25 is simply the program that

5 actually creates the credits for those pieces of activity

6 that did not get errored out.

7   Q   All right. So, in other words, it's just sort of

8 a follow-up, we have got this many that went through

9 smoothly?

10   A   No. The ones that went through smoothly, this is

11 the culmination of their going through. This is where the

12 actual credits get created that are going to end up being on

13 the customers bill.

14   Q   These are the completes, though?

15   A   Yes.

16   Q   And then what is an IRN trigger?

17   A   I'm trying to find where it says that in this

18 paragraph.

19   Q   At the very beginning, the MOOSA IRN triggers.

20   A   Oh, okay. The MOOSA IRN trigger, the original

21 piece of activity that came in from LMOS, it becomes one of

22 these if it doesn't error out. And that's how this job

23 knows which accounts to credit.

24   Q   All right. Let's go on to 2.02. And when you get

25 through -- are you ready?

1   A   Yes.

2   Q   Would you go through that paragraph for me and

3   explain that to me?

4   A   What that is saying is that the job that we were

5   just talking about --

6   Q   The one with the IRN MOOSA triggers?

7   A   Yes.

8   Q   All right.

9   A   It selects the different items of equipment on the

10 customers account that are eligible to be refunded, and it

11 creates an OC&C to accomplish that refund.

12   Q   Okay. And the OC&C is other charges and credits

13 statement on a customer's bill?

14   A   Yes.

15   Q   Does that mean then that the 9156 is generated by

16 a computer, that 9156 form is generated by a computer?

17   A   In this case, yes.

18   Q   Are there also manual generations of 9156 forms?

19   A   Yes.

20   Q   Were the accounting codes for 110 residents in G70

21 that appear on a 9156 form expanded?

22   A   I don't think I can answer that question the way

23 you have --

24   Q   The way that I've got it phrased?

25   A   Yes.

1   Q   Okay. I think I'm probably going to come back to

2 that, so I may have something else that's clearer, and I'll

3 put a check mark, we'll come back. Would you look at 3.0,

4 then. 3.02. Or just in general that section of MOOSA

5 controls, under 3, generally. My first question is under

6 all of that Section 3 where it says MOOSA controls, can you

7 give me some idea of what problems those controls were

8 designed to eliminate?

9   A   I'm not really sure, to tell you the truth.

10   Q   Then let's go to 3.02. And would you give me,

11 again, a brief explanation of what 3.02 does?

12   A   Okay. I think this is something that LMOS did,

13 but as far as it interacts with CRIS, I can answer that part

14 of it, if you like. I think this is intended to say that

15 the number of records that LMOS sent did, in fact, get into

16 CRIS and none were dropped.

17   Q   All right. Then, this is a 1992 version, correct?

18   A   Well, yes, it has that date on it.

19   Q   Do you know, or are you familiar with any earlier

20 versions of this particular CRIS user guide?

21   A   Yes, I would be, but I don't think this part of it

22 changed.

23   Q   You think that has always been the same?

24   A   Yes, I do.

25   Q   Did LMOS always pass directly to CRIS?

1   A   What, now?

2   Q   Did LMOS always pass out of service trigger

3 records directly to CRIS?

4   A   As far as I know, yes.

5   Q   The emphasis on all there, I mean it's underlined,

6 did LMOS pass all out of service records in the past to

7 CRIS, or is this a brand new something else has happened,

8 the system was designed so that now all the records go there

9 instead of some of them erroring out or something else

10 happening?

11   A   They did not used to pass them all.

12   Q   Which ones were not passed prior to whenever this

13 change went into effect?

14   A   I'm not sure, but I think it may have been the

15 multi-line ones.

16   MR. CARVER: Before you go one, let me just say if

17 you don't know, say you don't know.

18   THE WITNESS: I really don't know.

19   MR. CARVER: I mean, I don't have a problem with

20 you giving a reasonable --

21   THE WITNESS: I know that it changed, but I do not

22 know which ones they started to pass that they did not

23 pass before. I do, however, know that the ones that

24 they didn't use to pass, the end result is the same.

25 They ended up erroring out before, they just errored

1   out a different way.

2   BY MS. RICHARDSON:

3   Q   And now they error out to this particular CRIS

4   program?

5   A   (By Ms. Miller) That's correct.

6   Q   And those errors that we have talked about

7   originally with the multi-line account error would now be

8   labeled through the LMOS/CRIS process?

9   A   That's correct.

10   Q   I have another question here, toward the bottom of

11 that 3.02 section, it says RC20B04 also checks the invoice

12 numbers from day-to-day and produces a report showing

13 invoice numbers that are missing. Can you explain to me

14 what invoice number, where that comes from, what it attaches

15 to?

16   A   An invoice number is like a file identification on

17 each file that comes from LMOS. It's a cycle number.

18   Q   And you are speaking to someone who is not a

19 systems person, so is there any way to make that a little

20 bit clearer to me?

21   A   If I send you cycle one today, I'm going to send

22 you cycle two tomorrow. It's a sequential thing.

23   Q   Okay. 3.06, if you will look at 3.06. Can you

24 explain to me what is occurring with this particular

25 procedure?

1   A   The intent here is two things; the LMOS activity

2 is programmatically created, therefore, it should have no

3 errors in it. So if as much as 5 percent of it has an

4 error, the job will stop so that somebody can intervene and

5 say, "What is going on here?"

6   Q   Is that 5 percent of each cycle?

7   A   Yes. And the other one says the same thing about

8 the OC&C that are programmatically created by RF57B25, they

9 should also always be correctly formatted, and if as many as

10 5 percent are incorrectly formatted the job will stop.

11   Q   Can you explain what an incorrect format might be,

12 some examples of what that would be that would toss those

13 out?

14   A   Some field is in the wrong place. Some field that

15 is required to be populated has nothing in it.

16   Q   Can you give me an estimate of how many reports it

17 would take to equal a 5 percent error trigger?

18   A   I have no idea.

19   Q   How big a number?

20   A   No idea.

21   Q   Do you know who might be able to answer that

22 question?

23   A   No, I don't.

24   Q   Look at 4.09.

25   A   Okay.

1   Q   Under Number 3, under delete populated in money

2 amount position, can you tell me what creates a delete for a

3 particular customer account?

4   A   (By Ms. Gargiulo) When we receive the manual

5 handling, and we try to locate an account for instance, we

6 may have found that there was no such account. That would

7 be an example of one that would be deleted.

8   Q   Would that be like -- excuse me for interrupting,

9 but we are talking, for instance, one of those errors that

10 we talked about error in MOOSA account not found with an

11 H211 would come to you as a manual, and you would go back

12 and verify, and in verifying you would not actually find an

13 account, and then manually you would enter deleted, is that

14 what you are telling me?

15   A   Right.

16   Q   So then every delete is verified manually by human

17 interaction?

18   A   Right.

19   Q   Under 1.09, and I'm flipping back now, it mentions

20 the MOOSA area staff coordinator that receives

21 reconciliation reports, what exactly is a reconciliation

22 report?

23   A   It's a report that is generated for each bill

24 date, and it lists on that report any MOOSA that was sent 14

25 days prior to the bill date. And it's saying that that

1 MOOSA has not reflected, or the credit, if you will, is not

2 reflected on the customer's bill for that bill date, so why

3 isn't it.

4   Q   And then that would go to an employee or personnel

5 to actually physically take care of?

6   A   Exactly.

7   Q   And I think I asked you this before, but attached

8 to this I think you will find in an Exhibit C, and if you

9 could look at that, it's third from the last page, I

10 believe. And that is an example, is it, of a reconciliation

11 report?

12   A   That's correct.

13   Q   That's what one looks like?

14   A   Uh-huh.

15   Q   Then my other question was, do the columns on that

16 particular report also show up on the 9156 report, do they

17 correspond to the columns on the 9156?

18   A   Everything on this report has a position on the

19 9156. The 9156 has many more positions than this.

20   Q   But if I were going to look at an NPA on this and

21 then I also had a corresponding 9156, that NPA would be the

22 same for that customer?

23   A   Yes.

24   Q   And if I were going to look at an out-of-service

25 date like this 9/11/91, there would be a 9156 that also had

1   the same service date to that customer?

2   A   Yes.

3   Q   Okay, that's what I was trying to get to.

4   (Off the record.)

5   MS. RICHARDSON: I think you have these, they are

6   the actual -- I guess we ought to ask Phil. I'm

7   assuming I am dealing with nonconfidential documents

8   except for ones that show actual customer record

9   information. Do you have a determination on that?

10   MR. CARVER: Well, I mean, it's hard for me right

11 now to tell you. I mean, the stuff was requested and

12 produced. I don't think I was involved in producing

13 this, so I can't really tell you who asserted that it

14 was confidential at the time or asked that it be

15 treated that way. I mean, you have got stuff mixed in

16 there that is confidential and stuff that's not?

17   MS. RICHARDSON: Yes.

18   MR. CARVER: Well, then we are going to have to

19 treat it all as confidential until we sort it out.

20   MS. RICHARDSON: You didn't make any initial

21 determinations on the items that I gave you, then?

22   MR. CARVER: Was I supposed to?

23   MS. RICHARDSON: No, I'm afraid that was my

24 oversight. I didn't ask you to.

25   MR. CARVER: See, that's the thing, since I wasn't

in on the beginning of the depositions, since I did
follow-up work on these, and since I didn't do the
production, I don't know what we have asserted as
confidential and what we haven't. So rather than
waiving confidentiality on anything, I think we
probably have to treat it all that way for the time
being and see if we can sort it out afterwards.

MS. RICHARDSON: If you have got the set that you
brought with you, and let me give you one extra.

(Off the record discussion)

MR. CARVER: Basically, I just want to put on the
record that we have had a discussion off the record,
and we have agreed that we will have the same
stipulation that we have had before. If the deposition
is transcribed, then Southern Bell will have ten days
after the delivery to us of the transcribed deposition
to request confidential treatment for any portion of
the deposition and for any document or portion of a
document that is an exhibit to the deposition for which
we wish to have that treatment.

MS. RICHARDSON: Okay. If you could find that
particular document, this one, and then also the one
that looks like that, but is the larger stapled group,
if you will get that one out as well, and we will call
the two-pager Exhibit 2. And the multi-page Exhibit 3.

1   Did anybody else need another copy of the multi-page

2   exhibit?

3   (Composite Exhibits 2 and 3 marked for

4   identification.)

5   BY MS. RICHARDSON:

6   Q   If you could look at the two-page one first, and

7   tell me, it's titled a mechanized out-of-service adjustment

8   manual handling required report. Is this the type of

9   report, Ms. Gargiulo, that you work with?

10   A   (By Ms. Gargiulo) Yes.

11   Q   And then you are familiar with it?

12   A   Yes.

13   Q   Can you look at that report on the bottom of the

14 Page 4, the number that starts with the 407381, for that

15 particular number?

16   A   Uh-huh.

17   Q   And if you could just read that to me, what that

18 means?

19   A   The   is the main account number. The

20 549 is the customer code associated with that account

21 number. The 920320 would be March 20th, '92, is the

22 completion date from LMOS. The next 000,901 is the TAR

23 code, which is the taxing area. I can't remember, I never

24 can remember, but it indicates what taxing area a

25 particular account. The next 9203 out of service date

would be March 18th '92. 920319 was the restoral date for
the out-of-service on March 19th of '92. The next column,
where it has 28 and 35 crossed out would be the customer's
monthly rate. And then the last is the error code, the
HM00. On the next line, the 4073816111 is the actual line
that was out of service, and the 45100463 is the unique
tracking number that is assigned to this out-of-service
report.

    Q   That HM00 is a multi-line account, then, is that
-- I'm going back to my CRIS user guide and reading out the
errors?

    A   If that's what it says, I don't remember what the
error report said.

    Q   So that would be an example of a multi-line
account that has errored out through the mechanized process
and has come to you for a specific physical handling by your
people?

    A   Correct.

    Q   Then I'd like to ask one other question, then.
This particular report, then, if I'm looking at this, I
could assume that this person's service was out for, what, a
day?

    A   From the 18th through the 19th.

    Q   From the 18th through the 19th of March, and that
the rebate was processed on the 20th or not?

1   A   It was sent through, LMOS sent it through.

2   Q   To CRIS?

3   A   Right.

4   Q   On the 20th?

5   A   Uh-huh.

6   Q   So if it had not been kicked out as an error then

7   it would have been processed on the 20th through the system,

8   is that accurate?

9   A   (By Ms. Miller) Either the 20th or the next day,

10 depending on what time of day LMOS sent the file.

11   Q   And without reading names of things, but is there

12 a date on here somewhere that indicates to me when it was

13 actually processed then, because it was errored out, it was

14 handled by hand?

15   A   (By Ms. Gargiulo) Yes, where it's signed, 3/27/92

16 on the bottom.

17   Q   Okay. When we are talking out-of-service date and

18 the restoral date, there is no place on here to indicate

19 what time it went out of service and what time it was

20 restored, is there, so we don't actually know the number of

21 hours this was out of service, do we?

22   A   No.

23   Q   And I guess I had better clarify one thing, too,

24 so that I'm mistaken, this $35 amount is not the amount

25 rebated, is it?

1   A   No, that's the total monthly charge for the

2 customer service.

3   A   (By Ms. Miller) It's the monthly charge of the

4 items that are due to be rebated.

5   Q   So if it's a multi-line account, then that $35

6 covers every single line that customer has?

7   A   (By Ms. Gargiulo) Well, underneath that it lists

8 what is included in that charge.

9   A   (By Ms. Miller) It covers just that one line that

10 was out-of-service.

11   Q   Just the one line that was out-of-service?

12   A   (By Ms. Gargiulo) Yes. Because that's all that

13 is reported here.

14   Q   I think we are going to get into that in more

15 detail, I hope. Can you tell me from looking at this how

16 much was rebated?

17   A   No. The prorated amount, no.

18   Q   Can you tell me if the out-of-service date was

19 verified, since this was handled manually?

20   A   No.

21   Q   You do not verify whether or not --

22   A   No, we do not.

23   Q   Can you look at the report at the top of the page

24 now, 407668, and I'm not giving you the whole number because

25 I don't want to breach any confidentiality if I can avoid

1   it.

2   Would you look at that then and tell me when that

3   number was out of service?

4   A   I believe it's the 20th of April in '91.

5   Q   And when was it restored?

6   A   The 22nd of April in '91.

7   Q   When was the rebate processed?

8   A   The 21st of January, '92.

9   Q   And that was the machinery processed date. And

10 when was the manual handling rebate processed?

11   A   The 17th of February, '92.

12   Q   Is it usual to wait nine months to rebate an

13 out-of-service trouble?

14   A   No. This particular group here there was a

15 programming problem, and I can't even tell you what the

16 problem was. And there were a lot of out-of-service

17 adjustments that were passed on this 1/21/92 date from

18 previous out-of-service conditions.

19   Q   And when you say a programming problem, do you

20 mean LMOS programming?

21   A   I have no idea, I can't tell you.

22   A   (By Ms. Miller) It would have to be LMOS, it

23 would not be CRIS. Because LMOS determines what gets sent,

24 okay, and this is the LMOS date here.

25   Q   All right. So some reports were run then, or

1   completed on January 21st of '92, going back through at

2   least April of '91 picking up some out-of-services from

3   April of '91, and then rebating them. But they seemed to

4   have errored out, is that an accurate --

5   A   (By Ms. Gargiulo) That's right.

6   Q   So all of these then were manually handled?

7   A   Not necessarily. I don't know.

8   MR. CARVER: I just wanted to object to the

9   characterization. Go ahead.

10 BY MS. RICHARDSON:

11   Q   Can you tell me, do you know how the Company

12 catches those out-of-service reports after nine months?

13   A   (By Ms. Gargiulo) No, I have no idea.

14   Q   In your experience with the Company, both of you

15 have been with the Company a number of years, can you

16 indicate to me whether or not this is unusual for a

17 nine-month lag period?

18   MR. CARVER: I object to the form of the question

19   as to what is unusual.

20 BY MS. RICHARDSON:

21   Q   Is it out of the normal routine that you have been

22 aware of in your experience?

23   A   (By Ms. Gargiulo) Out of normal routine, yes.

24   Q   Ms. Miller, do you know?

25   A   (By Ms. Miller) I would say this is abnormal.

1   Q   If you could just look through Exhibit 3 and tell

2   me, does this appear to you to be more examples of the same

3   '91 LMOS reports because of the programming error, Ms.

4   Gargiulo, you mentioned being picked up and rebated manually

5   in '92?

6   A   (By Ms. Gargiulo) I think anything with the 1/21

7   date. The ones with the 1/21 completion date. Well, let me

8   look at all of these. Yes.

9   Q   So all of them fall into that --

10   A   Uh-huh.

11   Q   Go back to Exhibit 2 for just a moment and look at

12 that second page that is attached, because I want to make

13 sure I'm reading that particular form correctly, also. It

14 appears to me when I look at this form, it says that it's

15 Input Document - Emulate Form 9156. Is this a 9156, or

16 taken from a 9156, or can you explain to me where that data

17 comes from and why it says emulate Form 9156?

18   A   It's taken from a 9156. The 9156 itself is a

19 rather complicated form with lots of positions that must be

20 filled in. Not all positions are necessary to process a

21 MOOSA refund. These are the necessary positions, and so the

22 Comptroller's people have made this form a simplified 9156

23 for their own use so that they can do things faster and have

24 more on one page.

25   Q   Then does this second page to Exhibit 2 match the

1   information that's on the first page? The 407668 number,

2   does that match the top number on the next page and the same

3   information?

4   A   It does appear to.

5   Q   This is a chicken and egg question, which form

6   comes first?

7   A   The manual handling form comes first.

8   Q   And then the Comptrollers developed it's own 9156

9   form after it receives each one of these manual handling

10 reports?

11   A   That's correct.

12   Q   What purpose does the Comptroller use that 9156

13 form for?

14   A   This is the form that must be entered into the

15 CRIS system so that the credit will come on the customer's

16 bill.

17   Q   Okay. So this is just to speed up, make it more

18 efficient for data entry clerks to load this information

19 into the computer system, that's its purpose?

20   A   Yes.

21   Q   And what do those -- like under 407 there is a

22 line drawn down for two spaces. Can you give me any idea

23 why they have done that?

24   A   Yes, this indicates on this page here there are

25 three separate input documents, and that indicates that the

1   information in that position should also be entered on the

2   next two. It's like dittos.

3   Q   Okay. So is each one of those a separate account

4   that is being credited or --

5   A   No.

6   Q   I'm still not with you, then.

7   A   It's three different. This account had three

8   different USOCs that were to be refunded, one for each.

9   Q   Okay. So I'm trying to find -- oh, the USOC code

10 is there, but it's already loaded as 208?

11   A   (By Ms. Miller) No, that's not the USOC code.

12 The USOC itself is not on here, but the account code and the

13 money amount will match what is on the other form.

14   Q   Okay. And those are the ones that are handwritten

15 in.

16   A   Uniform service order codes.

17   MS. RICHARDSON: Okay. This is Exhibit 4, and I

18   think you have got this, but just in case you don't, I

19   think that came in your stack.

20   WITNESS MILLER; I don't think it did.

21   MR. CARVER: No, I haven't seen this one.

22   MS. RICHARDSON: I'm sorry I'm a bit shy on this

23   one in terms of the numbers of them.

24   (Exhibit 4 marked for identification.)

25 BY MS. RICHARDSON:

1   Q   Do you know what the release 23 module is that

2 that memo is referring to in Exhibit 4?

3   A   (By Ms. Miller) I do.

4   Q   Can you tell me what it is, please?

5   A   It's referring to the record layout of the 9156

6 form.

7   Q   And that is the page, the second page that is

8 attached?

9   A   This is a paper version of it.

10   Q   Okay. Can you look at the handwritten note on the

11 bottom, and I believe it says, "Kelly, this is how the OC&C

12 record or 9156 miscellaneous input record is changing for

13 CRIS Release 23. Call me if you have questions. Thanks,

14 Marguerite". The form then that she is talking about, is

15 this the new one or the old one, if I'm going to look at

16 9156, do you know?

17   MR. CARVER: I have no objection to her explaining

18   to you what she knows about it, but I do have an

19   objection to her interpreting what Marguerite meant by

20   her note or anything. So to the extent your question

21   asks for that, I just want to put the objection on the

22   record. But if you are just asking her to explain the

23   form, that's fine.

24   MS. RICHARDSON: Well, let's go ahead and clarify

25   that.

1 BY MS. RICHARDSON:

2   Q   You are familiar with 9156 forms, I believe?

3   A   (By Ms. Miller)   Yes.

4   Q   Are you familiar with an old form and a new

5 version of the form under Release 23?

6   A   Yes.

7   Q   Then can you tell me the one that is attached, is

8 this the new version under 23 or the old version?

9   A   I can't tell you that.

10   Q   You don't know?

11   A   I don't know.

12   Q   Can you tell me what a 9156 does, and you may have

13 told me this and I probably have already forgotten it, what

14 exact purpose -- it gets data into the machine, does it do

15 what now?

16   A   9156 is the form number that refers to an input

17 document representing an OC&C. It's the manual way to enter

18 an OC&C into CRIS to get on somebody's bill. It could be a

19 charge or a credit.

20   Q   Okay. And is access to the 9156 in terms of

21 manually rebating, is access to doing this kind of job

22 restricted to a particular job function or job department or

23 area?

24   A   Yes.

25   Q   Or can anybody get on and do it?

1   A   No, it's restricted.

2   Q   Can you explain to me why the reserved and ID,

3   Department ID fields that are circled on there were expanded

4   in the new form?

5   A   No, I can't.

6   Q   Where does the person filling in that 9156 form

7   get his or her information, where does it come from?

8   A   In general or specifically?

9   Q   Well, if I've got to fill one of these out, and I

10 am looking at REC type for the first field, and origin ID,

11 password ID, account ID, effective date and all of that from

12 date through date further down, where do I get the

13 information to put on this form?

14   A   If depends on the reason that you're filling it

15 out.

16   Q   Okay. I don't know what reason I would need to be

17 filling it out other than to manually process a rebate; is

18 there another reason than that?

19   A   Well, there is many reasons other than MOOSA that

20 you might have to enter one of these.

21   Q   Well, let's just stick with MOOSA, if we could.

22   A   The source for this document as far as MOOSA goes

23 would be the manual handling report.

24   Q   The one that we have talked about in Exhibit 3?

25   A   Two or 3.

Q   Okay. Is any verification done to check that the information that is written in on the 9156 is accurate?

A   I don't know.

Q   Do you know if any verification is done on the source data, which is the MOOSA manual handling report, to make sure that information is accurate?

A   Repeat the question.

Q   Do you know if any verification is done on this data on the MOOSA manual handling report, and I'm referring to Exhibit 2, to see if this information is accurate that is listed here?

A   (By Ms. Miller) Does your group verify it, I don't know?

A   (By Ms. Gargiulo) When we would fill that out, are you saying, after that is there some check?

Q   Yes. Is there some check, too, on the out-of-service restoral dates, or on the phone line, or when this report comes to you, what information do you verify, if any?

A   We would look up the telephone number, and we would look at what was on the account then and go from there.

Q   Is that on the business office record file, the BOCRIS file?

A   The BOCRIS file.

1   Q   And that's in the hard data file in the computer

2   base, is that right?

3   A   That's right.

4   Q   And you verify all that information by looking at

5   the actual customer account records?

6   A   We can't verify, for instance, the out-of-service

7   dates or anything like that. What we are looking up is to

8   verify the telephone number account and the customer code

9   which we have, and then to get additional information to put

10 on that record.

11   Q   And then, Ms. Miller, did you want to add

12 something as to whether or not the 9156 information is

13 verified?

14   A   (By Ms. Miller) No, all I was going to say was

15 when that comes --

16   Q   The mechanized manual?

17   A   -- to the Comptroller's, they have to do the same

18 thing that her group did and look at all the USOCs.

19   Q   But it's the account code specifically that are

20 verified, then?

21   A   Yes.

22   Q   When a customer calls in to complain that he

23 didn't receive enough of a rebate, all right, that his phone

24 was out-of-service longer than was shown on a 9156 form, or

25 he had more than one line out-of-service, or for whatever

1 reason, is his claim verified?

2   A   (By Ms. Gargiulo) Yes, the service rep would look

3 into that.

4   Q   And how would that get verified?

5   A   He would call repair to check with the repair

6 records to see what repair records indicate on it. He would

7 look at the customer records, the memo notations to see if

8 there is any additional information there that might

9 indicate that. He would check for service order activity

10 that might be involved.

11   Q   Where does the 9156 form go once it has been

12 filled in?

13   A   It goes to the local key punch group in the RAO.

14   Q   And after it has been input, the data has been

15 input, is there a retention, does this form get retained for

16 any period of time?

17   A   I'm not sure. I think so, but I don't know how

18 long.

19   Q   This is an interrogatory that was distributed in

20 910727, Citizens' third interrogatory, Item Number 1. And I

21 just want to direct your attention, first of all, to the

22 very last paragraph. You're also going to need with that,

23 this is Exhibit 5, and I'm going to pass you out -- Exhibit

24 6 was the total MOOSA records process that was in your

25 packet.

1   (Exhibit Numbers 5 and 6 marked for

2   identification.)

3   MS. RICHARDSON: Exhibit 6 is two graphs that were

4   produced by the Office of Public Counsel based upon

5   record information provided by Southern Bell. And they

6   represent the total MOOSA records processed daily in

7   Jacksonville and Fort Lauderdale. And they are

8   numbered at the bottom with a bate stamp Number 4 for

9   Page 1 and bate stamp Number 10 for Page 2. And

10   Exhibit 5 includes the interrogatories we sent to the

11   Company that addresses both graph Number 4 and graph

12   Number 10. And the Company did respond in terms of

13   graph Number 4 and Number 10 as to Public Counsel's

14   question as to the spikes in January, the end of

15   January '92, that the spike in January '92 reflects

16   rebates for historical reports. That's at the bottom

17   of the first page, and then at the bottom, or in the

18   response on the third page it also says and January

19   1992 spikes in Exhibit 5. I will give you plenty of

20   time to absorb that. And to make it clear, Gary Hall

21   was the Respondent for the Company on the

22   interrogatories.

23 BY MS. RICHARDSON:

24   Q   Are you familiar with the MP-403-M form? I

25 believe we covered it in the CRIS user guide, Ms. Miller.

1   A   (By Ms. Miller) Yes, I know what one looks like.

2   Q   And it does indicate the MOOSA records that are

3 processed on a daily basis, is that correct?

4   A   Yes, just the total number.

5   Q   All right. And we can see that according to the

6 graph that we have produced off of your records, that in

7 January 31 of '92, in Jacksonville, and a little earlier

8 than that, around the 21st of January of '92, the number of

9 MOOSA records processed daily in the thousands was well

10 above average, and well above what is generally done for the

11 Company, is that not accurate in terms of what the graphs

12 reflect?

13   MR. CARVER: Object to the form of the question.

14   MS. RICHARDSON: Let's just make it a statement,

15   then. And let me ask a question at this point.

16 BY MS. RICHARDSON:

17   Q   Can you describe the process involved in

18 historical rebates that were done in January of '92?

19   A   (By Ms. Gargiulo) No, I can't.

20   Q   Were the rebates that you are referring to in

21 January 21, '92 from the earlier mechanized manual handling

22 reports that we went through, are those reflected, do you

23 feel, on these graphs?

24   A   I don't know.

25   MR. CARVER: Object to the question.

1   Q   Do you know who would know? Do you have any

2 information as to who would be able to answer that question?

3   A   No.

4   Q   Ms. Miller, have you any idea?

5   A   (By Ms. Miller) I would think Gary Hall would,

6 but I don't know.

7   Q   Can either of you describe the process involved in

8 rebating customers under the settlement agreement with the

9 Attorney General? Ms. Gargiulo, I believe you said that you

10 were going to be working on that.

11   A   (By Ms. Gargiulo) Right. When you say the

12 process --

13   Q   The internal company process involved in handling

14 those rebates, how are you going to be doing that?

15   A   I don't know. I can't answer how, the method that

16 we are going to use.

17   A   (By Ms. Miller) I can't either.

18   Q   Looking at the graphs, do either one of you have

19 an explanation for why the MOOSA records processed daily in

20 January skyrockets, basically, from what is average for

21 these records?

22   MR. CARVER: Object to the form of the question.

23   A   (Both witnesses indicating no.)

24   Q   Did either one of you participate in the September

25 1991 MOOSA audit that the Company did?

1   A   (Both witnesses) No.

2   Q   Have either one of you seen it?

3   A   (Both witnesses) No.

4   MS. RICHARDSON: This is Exhibit 7. Again, this

5   is a response from Mr. Hall to Citizens' 910727, third

6   interrogatory, Item Number 15. And at the bottom he is

7   still speaking about graph Number 10. When several

8   prior situations that were not originally rebated were

9   rebated, speaking about graph Number 10 and the spike

10   in particular.

11   (Exhibit 7 marked for identification.)

12 BY MS. RICHARDSON:

13   Q   Do either of you have any idea what Mr. Hall is

14 referring to in his statement, in the January '92, prior

15 situations that were not originally rebated?

16   A   (By Ms. Miller) I don't.

17   A   (By Ms. Gargiulo) No.

18   Q   The 9156 form shows up on an RF0838IS form,

19 doesn't it, Ms. Miller?

20   A   (By Ms. Miller) I don't know what RF0838IS is.

21   MS. RICHARDSON: It's the total rebated revenue

22   form, and I have a deposition from Mr. Renofrin

23   (phonetic) that states that is where that comes from.

24   So if we can just take that -- I will be glad to show

25   it to you, Phil, if you need the statement from the

1   Company, or just accept it and let it be subject to

2   check later.

3   MR. CARVER: What am I accepting, that the 9156

4   feeds into the other one?

5   MS. RICHARDSON: Yes, shows up on. It would not

6   be a part of. When asked about 9156 forms, my question

7   to Ms. Mason was based on having 9156 manually handled,

8   and those reports are now in the system and having been

9   credited, would it show up in any of the forms that you

10   have listed. She had provided me a list, and she said

11   yes, it would. It would be reflected on the 0838IS,

12   Florida Interruption Service Report. It would not be a

13   part of, it may be a part of the MOOSA activity sample,

14   depending on if it hits the sample. And then we are

15   talking about the NP2312. So for the purpose of this

16   question, according to Ms. Mason from the Company, the

17   9156 shows up on the Florida Interruption Service

18   Report. Do you need to see that?

19   MR. CARVER: Well, let's just do this, if I later

20   decide your predicate is improper, that's something I

21   can object to later, I think that can be preserved, so

22   let's go ahead. For purposes of your question, you can

23   go ahead and make any predicate you want, because that

24   would be one that's preserved.

25   MS. RICHARDSON: And we'll do Exhibit 8.

1   (Exhibit 8 marked for identification.)

2   BY MS. RICHARDSON:

3   Q   Okay. So for purposes of Exhibit 8, Exhibit 8

4   indicates, or the information for that comes from the 9156

5   forms, okay. And that's what is subject to check. In your

6   estimation can you give me what an average amount credited

7   to a residential account for out-of-service over 24 hours

8   would be, do you have any idea?

9   A   (By Ms. Gargiulo) No.

10   A   (By Ms. Miller) No.

11   Q   Based upon the information that the Company gave

12   us on these forms, Public Counsel produced the graph that is

13   Exhibit 8 bate stamped Number 19, and determined that the

14   total monthly average in 1990 was $7,586, and that the total

15   monthly average from May of '91 to April of '92 was $16,348.

16   Looking at Public Counsel's graph, and we have got a line

17   drawn from September of '91 forward through April, the

18   amount of total MOOSA rebated revenue goes up dramatically

19   to almost around $37,000, hitting a peak around December and

20   January, sometime in that time frame of '92. Can you

21   explain why there was such a dramatic increase in the amount

22   of money rebated in that time period?

23   MR. CARVER: I'm going to object to the form of

24   the question because there was a real long speech

25   tacked on to the front of that. But the bottom line is

1   you want is you just want to know why it went from

2   7,568 to 16,348, that's fine.

3   MS. RICHARDSON: Let's use that as the question.

4   BY MS. RICHARDSON:

5   Q   Can you explain that increase, either one of you?

6   A   (Both witnesses) No.

7   Q   Do you think the historical rebates that Mr. Hall

8   mentioned might be a cause for that?

9   MR. CARVER: Don't speculate. But if you know you

10   can answer.

11   MS. GARGIULO: I don't know.

12   MS. MILLER: I don't know.

13 BY MS. RICHARDSON:

14   Q   All right. In your estimation, what is an average

15 amount credited to a single line business account when it's

16 out-of-service over 24 hours?

17   A   (By Ms. Gargiulo) I don't know.

18   A   (By Ms. Miller) I don't know.

19   Q   Do you have an estimate or can you give me an

20 estimate of what an average ratio of MOOSA rebates processed

21 to manual rebates in any one month or day? Do you have an

22 average number per day in terms of MOOSA rebates? Manually,

23 not mechanized.

24   A   (By Ms. Gargiulo) Repeat your question again.

25   Q   About how many manual MOOSAs would you handle on a

ACCURATE STENOTYPE REPORTERS, INC.

1 daily basis?

2   A   For the state, 25. 25 to 50 for the state.

3   Q   So anything above 25 to 50 would be slightly

4 above, or depending on the number, greater than above normal

5 or average in your estimate?

6   A   Yes.

7   Q   Are either of you aware of any audits that were

8 done on the MOOSA program procedures?

9   A   (By Ms. Gargiulo) I'm aware there was an audit

10 done, but that's all.

11   A   (By Ms. Miller) That's about the same thing that

12 I know.

13   Q   Do you know about the time that one that was done

14 that you are aware of?

15   A   (By Ms. Gargiulo) No.

16   Q   You have no idea when it was done?

17   A   (Indicating no.)

18   MS. RICHARDSON: And this one is in your packet,

19   too. As a matter of fact, I only have one for the

20   court reporter. It is the one that is titled

21   out-of-service troubles, and it's a three-page exhibit.

22   The first line reads, "Four of our most important

23   service measurements are driven by how well we handle

24   our out-of-service troubles", and this will be Exhibit

25   9.

1   (Exhibit 9 marked for identification.)

2   BY MS. RICHARDSON;

3   Q   And I really only have a question on that last

4   paragraph on the first page, if you would just read that.

5   It starts, "Requires a rebate for the number of hours", and

6   it states that the average rebate is less than a dollar,

7   that the administrative cost of the Company is about $200.

8   Is that accurate?

9   MR. CARVER: Before you answer that question, let

10   me find my copy of it.

11   MS. RICHARDSON: That's fine.

12   MR. CARVER: I can't seem to find it here. Okay,

13   where are you reading from?

14   MS. RICHARDSON: The very last paragraph.

15   MS. MILLER: I have no idea.

16   MS. GARGIULO: Neither do I.

17   BY MS. RICHARDSON:

18   Q   So then you have no idea essentially how much it

19   costs for processing a rebate is what you're telling me?

20   A   (By Ms. Gargiulo) That's correct.

21   A   (By Ms. Miller) That's right.

22   (Lunch recess taken.)

23   MS. RICHARDSON: All right, if you would look at

24   Page 2 -- well, let me identify Exhibit 10 as a

25   document, it's a memo dated April 26, 1990 from John

1   Sheehan to four or five people beginning with Denny

2   Fields. And Page 2, the paragraph after the indented

3   paragraph beginning, "When an OC&C receives a 983 or

4   984 error (which is placed in an 039 record error

5   field) or a MOO error (which is placed in a 305 error

6   record by C20), it does appear as errored activity on a

7   certain hold file print. However, I am told that

8   unless the suffix (clerk identifier) column on the

9   print is populated, no action is taken by the Revenue

10   Accounting Office to investigate or correct the error."

11   (Exhibit 10 marked for identification.)

12   BY MS. RICHARDSON:

13   Q   Now, I'm really lost in that particular paragraph,

14   can either of you help me out with what are 983, 984, MOO

15   error, C20?

16   A   (By Ms. Gargiulo) I can't.

17   A   (By Ms. Miller) I can help you out a little bit.

18   Remember, I told you that at some point the CRIS system was

19   regionalized?

20   Q   Uh-huh.

21   A   The CRIS user guide documentation that you have

22   reflects the regional version of MOOSA. These terms in this

23   paragraph and in this document refer to preregional things,

24   reflected in MOOSA in Southern Bell. 983 and 984 errors

25   correspond to some of the current error codes, I don't know

1   which ones.

2   Q   The ones we talked about in Exhibit 2?

3   A   Yes. MOO is the same thing as HMOO error codes.

4   Q   Okay.

5   A   That reference to C20, that is shorthand for

6   0122C20, which is the old version of the service order

7   update job.

8   Q   Which we also talked about in Exhibit 2?

9   A   Yes, we talked about that job, yes. And I don't

10   know what the rest of it is. That's about all I can help

11   you on that.

12   Q   Do you know what a suffix or clerk identifier is?

13   A   No.

14   Q   Then you wouldn't be able to identify or tell me

15   why no action would be taken?

16   A   No.

17   Q   On Page 3, we have the last two paragraphs there.

18   We next refer to a couple of questions submitted by Kathryn

19   Miller. Is that you, Kathryn?

20   A   Yes, that is me.

21   Q   All right. "First, Kathryn asked if we refund

22   taxes during the MOOSA process. Jeffery and Shirley said

23   that we do, and that is done through tax by account code

24   logic. (But we obviously are refunding the wrong taxes and

25   amounts since we only use A/C 110 and G70 today)." Can you

1   explain, please?

2   A   Maybe. The question that was being addressed here

3   was how the regional system should handle the MOOSA refunds

4   as far as taxing logic goes.

5   Q   Okay.

6   A   The idea being that we would do the same thing

7   that was already done, or a better version if one was

8   necessary. And tax by account code refers to the fact that

9   every USOC has associated with it a three-digit account code

10   which determines how the revenue for this thing is

11   classified, accounting classification.

12   Q   You mean city, state, county?

13   A   No. How it's booked in the journals, and I don't

14   know, I can't give you any specifications on that. Like

15   whether it's revenue, or expense, or junk like that.

16   Accounting, we are talking accounting terminology, okay, and

17   that's about all I can tell you about that. But the account

18   code that's associated with each USOC determines how it is

19   taxed, and that does refer to federal, state, city, county,

20   and whatever kind of taxes there are.

21   Q   So we do refund taxes, then --

22   A   Yes.

23   Q   -- during the MOOSA process?

24   A   Yes.

25   Q   That next paragraph, "Next, Kathryn", is that

1   still you referred to there?

2   A   Yes.

3   Q   "Asked if the through and from date for these

4   OC&Cs are modified by anyone to take into the consideration

5   that when Regional OC&C performs fractionalization it always

6   adds one to the from date and subtracts one from the through

7   date. Her concern is that the customer does not get enough

8   days fractional credit." Can you explain what your concern

9   was? And if you would look at Exhibit 2, and Page 3.41.12,

10 and that was the CRIS user guide?

11   A   My concern here was something that turned out to

12 be a misunderstanding on my part. What is described in this

13 paragraph is some logic that is performed by the OC&C job,

14 but I later found out that this logic does not apply to

15 MOOSA OC&Cs. It applies to everything else. On MOOSA

16 OC&Cs, what is in the CRIS user guide is what is done

17 instead of what is described here.

18   Q   Okay. And then reading from the CRIS user guide,

19 under the note on the Page 3.41.12, it says, "To determine

20 the number of days for the MOOSA adjustment, subtract 1 from

21 the through date shown on the demand print or MP-2312. Do

22 not adjust the from date." All right. Is that through date

23 the same date that we looked at on Exhibit 2, where we had

24 out-of-service date and restoral date, or is that the from

25 date on Exhibit 4 with the 9156 forms?

1   A   They are the same.

2   Q   They are the same. So, this is the date that date

3 was restored and that comes from LMOS?

4   A   Yes.

5   Q   Okay. So, we are talking about restoral date.

6 Now that I've got that straight, can you tell me why you

7 subtract a 1 from the restoral date on an out-of-service?

8   A   Yes. This is an understanding between LMOS and

9 CRIS, to determine the number of days credit that should be

10 given when -- and I will have to give an example to explain

11 this.

12   Q   That's fine.

13   A   If LMOS sends an out-of-service date of January

14 1st, let's say.

15   Q   1-1.

16   A   Yes, 1-1, and a restoral date of 1-3, they mean

17 for us to give two days credit. What they mean is take the

18 1-3 and subtract from it 1-1 and the person gets two days

19 credit. Does that make sense?

20   Q   Yes. I am not sure what -- are you saying that --

21   A   I am working up to this.

22   Q   Oh, you're working up to that? Oh, okay. I'm

23 with you so far then.

24   A   Okay. However, on the customer's bill, it's my

25 understanding that any day that is mentioned anywhere on the

1 bill must be a charge or a credit for that whole day. Okay?

2 So, two days credit from LMOS is going to look like 1-1

3 through 1-3, but two days credit on a CRIS bill is going to

4 look like 1-1 through 1-2, because 1-1 is mentioned and 1-2

5 is mentioned on the bill. Therefore, it must be two whole

6 days credit. This just refers to what it is going to look

7 like when it ends up on the customer's bill. In other

8 words, subtract one from the through date means take 1-3,

9 take one away and you get 1-2.

10   Q   Okay. And so under the other charges and credits,

11 we would have a statement saying for outage of service on

12 January 1st and January 2nd, your amount of credit is, is

13 that what that subtraction one process does?

14   A   Yes, it results in the phrase on the bill. The

15 phrase on the bill is what is shown on Page 12 here. In the

16 example I've given it would say, "Credit for interruption of

17 service from January 01, '92 through January 02, '92. It

18 would be the same two days credit that LMOS had sent us the

19 record for, though.

20   Q   Okay. That is very helpful. That makes that a

21 lot clearer. So, there would be no credit for any part of

22 the service being out on the 3rd?

23   A   That is that is my understanding.

24   (Deposition Exhibit Number 11 marked for

25 identification.)

1 BY MS. RICHARDSON:

2   Q   Exhibit 11 is a March 29, 1991 memo to "Managers -

3 Customer Services, (Florida and Georgia Only).   Subject,

4 MOOSA error report changes.

5   Ms. Miller, do you recognize this particular memo?

6   A   (By Witness Miller) Yes.

7   Q   Can you explain, are the errors that are listed in

8 the center of that memo the same as we covered in Exhibit 2,

9 the CRIS user guide?

10   A   Yes, with the understanding that the two in the

11 middle are reversed, and they refer to each other like the

12 arrows indicate.

13   Q   Okay. Then looking at that last paragraph on that

14 page, it says, "These error reports should be worked and

15 forwarded to Voucher Audit by the end of the next business

16 day." Can you tell me what "worked" and who "Voucher Audit"

17 is?

18   A   (By Witness Gargiulo) I can answer that.

19   Q   Okay. Either one of you.

20   A   This would be the manual handling report, and they

21 would need to investigate it, fill out all the information

22 and send it down to comptroller's. The voucher audit --

23   Q   Refers to the group in the comptroller's?

24   A   The comptroller that processes the MOOSAs.

25   Q   Oh, okay. All right. And look on Page 2 and that

1 first paragraph. "We have received reports from South

2 Florida of MOOSA error reports not being received. IBOSS

3 programmers indicate that these reports are being

4 transmitted. We are investigating this problem and will

5 advise as soon as more information is available." Can you

6 tell me what the problem was?

7   A   Yes. We were not receiving actual manual handling

8 reports over our printers on a reasonable basis, a steady

9 basis. Some of the offices were not receiving them daily or

10 at least every couple of days, so there was a problem.

11   Q   And do you know why they weren't receiving them?

12 Was it a programming error or just a manual, somebody didn't

13 put it in the machine?

14   A   And that is what this refers to at this point. It

15 turned out that there was a problem that I really can't give

16 you all the information about because I really didn't

17 understand the problem. It was a problem when we were

18 converting to soft 2.0, which is a new service order system.

19   Q   Is that from CORDNET, when they retired CORDNET?

20   A   Exactly. It was a problem there with some of the

21 printer IDs. Each office has an associated printer with an

22 ID number that, at this time, MOOSA went to all of our

23 offices throughout the state by the area that they handled

24 as opposed to now, where they all come into the quality

25 assurance center. And there was a problem with the printer

1   IDs as well, and that is as much as I can tell you.

2   Q   Okay. The change that you just mentioned, how

3   many offices all over the state were receiving it before it

4   was isolated to one office? Do you have any idea how many

5   places this got spread out?

6   A   I believe we have approximately 26 offices. Well,

7   we have 26 service centers. I can't tell you for sure.

8   Q   So, each service center was processing its own set

9   of MOOSA?

10   A   Exactly.

11   Q   Well, let me clarify that, its own set of manual

12   produced MOOSAs. The automatics were still going through

13   properly?

14   A   Right. This was only the manual handling that's

15   handled in customer service.

16   Q   Okay. Were there more errored out reports or more

17   credits that didn't flow through when it was spread out

18   through 26 different offices than now when you have just one

19   office that's doing it on a daily basis?

20   A   I'm sorry, repeat your question again.

21   Q   Why did you go from 26 offices to one? Why did

22   the Company decide to make that centralization change?

23   A   So that it would be better handled. Since we had

24   a centralized location now that was handling all

25   reconciliation, it needed to be handled in a timely fashion

1 and was not always handled in a timely fashion. So, we put

2 it in one center so there would be better control over it.

3   Q   Okay. Do you recall if at all there were any

4 particular customer credits lost because of this problem

5 that was referred to, the programmers indicate reports not

6 being transmitted?

7   A   When the problem was discovered they did a run

8 again during that time period, and reran everything so that

9 all the customers did receive their credits, but it was at a

10 later date.

11   MS. RICHARDSON: We have another exhibit, No. 12.

12   (Exhibit No. 12 marked for identification.)

13 BY MS. RICHARDSON:

14   Q   Ms. Miller, do you recognize this?

15   A   (By Witness Miller) Yes.

16   Q   And is this an E-mail or computer mail screen or a

17 print of one?

18   A   It's a print of one.

19   Q   Okay. And it refers to you as a Staff-Analyst,

20 Information Systems?

21   A   Yes.

22   Q   Okay. So, that was your job prior to the one

23 you're doing now?

24   A   That is correct.

25   Q   All right. And that is when you were programming,

1   specifically for Information Systems?

2   A   I wasn't actually programming at this time. I was

3   in a coordination role.

4   Q   Okay. Can you please explain to me -- it says,

5   "Subject: MOOSA/IC." Is IC installment credit? Right at

6   the top, do you see that in the subject?

7   A   Let me remind myself.

8   Q   Sure.

9   A   Let me read this.

10   Q   Help yourself.

11   (Pause)

12   A   Yes, it is referring to installment credits.

13   Q   And the installment credit question, can you

14   basically take me through this, because you use a lot of

15   acronyms, and I don't understand.

16   A   Let me read the whole thing through and make sure

17   I remind myself of what this was about.

18   Q   Okay.

19   MR. CARVER: I don't know if I have just got a bad

20   copy, but I can't really read mine.

21   MS. RICHARDSON: I'm having trouble, too. And

22   this was the best copy we got. We tried to sharpen our

23   copier on it, and the one that's coming up next is even

24   worse. And that is the best we could get out of what

25   we got from the Company, unfortunately.

1   MR. CARVER: I'm wondering if maybe that whole

2   first paragraph should be read into the record,

3   because --

4   MS. RICHARDSON: Be glad to.

5 BY MS. RICHARDSON:

6   Q   Do you want to make a stab at it, Ms. Miller?

7   A   It's missing the left-hand column, but I will try.

8 I think it says, "I want to talk to you about something you

9 brought up in PROCC yesterday."

10   Q   P-R-O-C-C --

11   A   Yes.

12   Q   -- is what?

13   A   It's an acronym for -- oh, I don't know.

14 Pre-regional ongoing change control, or something like that.

15 It's a committee we had set up while we were working on the

16 regionalization of CRIS.

17   Q   Okay.

18   A   Okay. And I think it says, "I tried to call, but

19 your VMS wasn't picking up. You said that the MOOSA --" I

20 guess that is, "OC&Cs take into account any USOCs that have

21 IC on them. I think that's what you said," in parentheses.

22 "Could you please give me more details on this? Does C20

23 just skip the IC USOCs like it skips the wiring maintenance

24 USOCs when it's --" and I think that says, "creating the

25 MOOSA OC&Cs, or does it create a credit and then a charge."

1   And I can't read the next part, "depending on the IC date or

2   what. Also, I need some more details on MOOSA in general,"

3   maybe. "Exactly what criteria does C20 use in skipping the

4   wiring maintenance USOCs? Can you give me an exact list of

5   the USOCs it skips. Also, Barry said something about the

6   OC&Cs applying only for BOC USOCs. Are there any other

7   details I need to know? Feel free to either," probably,

8   "call or respond to this note. Sorry to ask so many

9   questions at once. I appreciate your keeping me straight on

10   this MOOSA stuff." That is the best I can figure out what

11   it says.

12   Q   Okay. So, the concern was with installment

13   credits and how they were handled on rebating, refunding

14   money to individual out-of-service customers? Is that the

15   general gist of this?

16   A   Yes.

17   Q   Okay. And how are installment credits handled or

18   how were they handled at this time? This was a 1990 memo.

19   A   I'm not sure how they were handled at the time,

20   which is why I was asking the question. I can tell you how

21   they are handled now. Well, it looks like by the answer

22   that I wrote on the bottom of the page that he must have

23   told me that the IC was not taken into account. Do you want

24   me to explain what that means, is that what you're asking?

25   Q   Yes, uh-huh.

1   A   Okay. Installment credit means that the customer

2   is not paying for that USOC for a period of one month or two

3   months or whatever time during which we had this promotional

4   offer going on. What really is happening, though, is he is

5   paying for it, but he is getting a credit back for the same

6   amount on his bill. And it will say "get acquainted offer."

7   If the customer is not paying for it, technically he is not

8   due a refund on it because he is not paying for it.

9   However, according to this answer that I wrote down here, it

10 must be that the old MOOSA program did not take that into

11 account, meaning that it probably refunded the customer more

12 than he was due.

13   Q   Okay. And now the program does take it into

14 account?

15   A   Yes, it does take it into account. It looks at --

16 there is a date associated with the IC, and the date gives

17 the date on which the customer will begin to pay for that

18 service. And so the credits will go up to that day and that

19 is as far as they will go, so that the customer is getting

20 refunded exactly the part that he is paying.

21   Q   Okay. MOOSA excludes three USOCs, I think you've

22 got down there. And which three USOCs is it excluding from

23 credit that a customer doesn't receive credit back on?

24   A   Well, what it was doing at the time, according to

25 this note, is it was excluding WMQ, WMR and SEQ1X.

1   Q   And are those inside wire USOCs or just plain

2 wiring USOCs or --

3   A   I think they are inside wire. I know SEQ1X is. I

4 can't remember about the other two.

5   Q   Okay. You had a question up here. "Exactly what

6 criteria does C20 use in skipping the wiring maintenance

7 USOCs?" And can you give me an exact list of the USOCs it

8 skips? Is that the list, then?

9   A   I think this is the list of what he was doing at

10 the time, yes.

11   Q   Exhibit 13, and this is -- oh, this is so bad I'm

12 not even sure -- let me pass it out. I am not sure we are

13 going to be able to deal with this. I may just have to ask

14 you some general questions.

15   (Exhibit Number 13 marked for identification.)

16   MR. CARVER: We are going to have to have a seance

17   to figure out this.

18   MS. RICHARDSON: I don't even know if you can make

19   out your name at the bottom of that particular one.

20   WITNESS MILLER: I do see that. That is about all

21   I can see.

22   MS. RICHARDSON: Okay. And the subject was MOOSA

23   reconciliation logic problem on this particular one.

24   My question deals with, and I think it's in here. We

25   may have to go to -- let's not even count that as

1   Exhibit 12, if that's possible. Let's just go to this

2   one, and we'll make this one Exhibit 13. We'll just

3   cancel that because we can't read it. This will give

4   us a starting point to go from.

5 BY MS. RICHARDSON:

6   Q   Ms. Miller, is this one of your responses to one

7 of our 27th interrogatories, Item Number 3?

8   A   (By Witness Miller) Yes, it is.

9   Q   Okay. And in that we asked you about the LMOS

10 Account Codes, 110 Residence and G70?

11   A   Uh-huh.

12   Q   And how those particular codes got rebated, and

13 whether or not that was part of the journalization bug that

14 was in that program modification. All right. And if you

15 could just take a second to read your answer, then I have a

16 couple of questions for you?

17   A   Okay.

18   Q   Now, I'm asking because I'm a little confused. I

19 need to know how the 110 and G70 account codes are populated

20 by LMOS. If they are not LMOS account codes, how are they

21 populated by LMOS in the 9156 MOOSA records?

22   A   Okay. LMOS puts 110 in there if it's a residence

23 account, and it puts G70 in there if it is a non-residence

24 account. However, those codes do not end up getting used

25 for anything.

1   Q   Then why are they used?

2   A   They used to be used by the old system.

3   Q   Okay. And they are ignored under the new system?

4   A   Yes.

5   Q   And how were they used by the old system?

6   A   I believe they determined how the rebate was

7   journalized.

8   Q   And can you explain how the rebate was

9   journalized, what you mean by that?

10   A   I mean what accounting classification it went to

11   in the books.

12   Q   Okay. We've tried to figure this out. Okay. And

13   we are hoping that you can help us with this.

14   MS. RICHARDSON: Walt, can you explain? And if

15   you need to draw pictures, that's fine.

16   MR. BAER: I've got some notes.

17   MS. RICHARDSON: Oh, good. We'll make this

18   Exhibit 14.

19   (Exhibit Number 14 marked for identification.)

20   MR. BAER: On the first entry up here on the left,

21   the F1 and 2, if you can imagine that these are the

22   individual features that one person has on the line,

23   okay? All right. And if he is supposed to have the

24   refund on these, how did these get all credited when

25   you only used the old method that you had with the 110

1   accounting code? How did he get credited for all of

2   them, you know, if you only had the one account code?

3   WITNESS MILLER: Okay. I can answer that. The

4   account code had nothing to do with which features got

5   refunded. That is how it happened. And I think that

6   is probably stated in my interrogatory answer here.

7   The program went to the customer's account and it

8   pulled every USOC that was to be refunded. Now, I'm

9   talking the way it used to be.

10   BY MS. RICHARDSON:

11   Q   Please.

12   A   (By Witness Miller) He took them all. And if he

13   had Feature 1, 2 and 3 -- and it looks like you have them

14   labeled $1, $2 and $3 -- he added them together and came up

15   with $6. So, the customer got the correct money amount in

16   his refund. It just was all journalized to 110, and it

17   probably should not have been. But it was journalized that

18   way because they were all added together at the time.

19   Q   Okay.

20   A   So, it only ended up being one physical OC&C.

21   MR. BAER: All right. Then afterwards each of

22   them, on this part here, each feature had its own

23   account code then, right?

24   WITNESS MILLER: That is correct.

25   MR. BAER: And this is the period that you are

1   referring to as when you had the journalization bug, is

2   that right?

3   WITNESS MILLER: That is my understanding. That

4   term was not one of my terms. "Journalization bug" was

5   just one that appeared in the interrogatories, and that

6   is our understanding of what that was referring to,

7   yes.

8   MR. BAER: How were they added together, though,

9   during this time period?

10   WITNESS MILLER: The new way? The difference, the

11   main difference between the old way and the new way was

12   that the old way took the one record that came in from

13   LMOS, and it went and got all the USOCs and found the

14   total money, and it plugged it into the record, which

15   already had the one account code in it, and it went on

16   the customer's account. The new way, the record from

17   LMOS is treated as a trigger. It says go to this

18   account, find everything that should be refunded and

19   creates one OC&C for each USOC. Okay. Each USOC OC&C

20   would carry the account code associated with that USOC.

21   So, you got three OC&Cs off of this account instead of

22   just one. Okay. The only thing that changed was the

23   journalization of the refund, because the account code

24   would now be correct. The new way, by the time these

25   three OC&Cs reached the customer's bill, they would

1   have combined and would appear as only one phrase,

2   because everything about them was the same except the

3   account code. And the account code does not have

4   anything to do with how it appears on the bill.

5 BY MS. RICHARDSON:

6   Q   Okay. And when did this change go into effect?

7   A   The change was part of the regional implementation

8 of MOOSA, so that would have been March '91 in Jacksonville

9 and May '91 in South and Southeast Florida.

10   MR. BAER: And that is this area down here, right?

11   Does that describe how it's currently done, where each

12   feature has its own account code, and it has its own

13   OC&C code?   Is that right?

14   WITNESS MILLER: Yes.

15   MR. BAER: And then they are added on the bill?

16   WITNESS MILLER: That's correct.

17   (Discussion off the record.)

18   MS. RICHARDSON: All right. And then this is

19   mostly just for purposes of getting this as an exhibit

20   on the record with what we have just talked about. So,

21   I may have one question for it, but in order for me to

22   go back and review this again, I think it's going to be

23   helpful to have these together. This would be Exhibit

24   15. And this is Citizen's 27th Interrogatories, Item

25   Number 7. And we're, again, talking about a

1   journalization bug that existed at one time.

2   (Exhibit 15 marked for identification.)

3   BY MS. RICHARDSON:

4   Q   And, Ms. Miller, is this your response?

5   A   (By Witness Miller) Yes.

6   Q   And I believe you say that, "We believe that the

7   implementation of USOAR (Uniform System of Accounts Rewrite)

8   on January 1, 1988 is when the USOCs on an account were

9   broken out from one major account code," and that's 110 and

10   G70 to several account codes, and then that would be the

11   correct date for that. And then you also say, "The regional

12   CRIS data base was installed in North Florida of March of

13   '91," rather than May or April?

14   A   March of '91 for Jacksonville, May of '91 for the

15   rest of Florida.

16   Q   Okay. Then that statement is still accurate?

17   A   Yes.

18   Q   All right. That is all I need with that.

19   MS. RICHARDSON: And we are up to Exhibit 16.

20   (Exhibit Number 16 marked for identification.)

21   BY MS. RICHARDSON:

22   Q   At the top of that page is a handwritten

23   "Kathryn." Ms. Miller, is that you?

24   A   (By Witness Miller) Yes, it is.

25   Q   Okay. So, you have seen this memo?

1 A Yes.

2 Q All right. And this is a memo dated May 25th,

3 1988, and subject matter at the top was "Minutes From MOOSA

4 Meeting Held on May 25." I'll give you a chance to look at

5 it. (Pause)

6   The purpose of this meeting, according to this

7 memo, was to do what?

8 A I was not at this meeting, so I can only read what

9 is on here. It was called to discuss changes needed to the

10 way MOOSA OC&Cs are generated today.

11 Q All right. And how did you come by this memo,

12 since this was given to you?

13 A When I got involved in the regionalization of CRIS

14 and was designated as the person to handle MOOSA, I needed

15 some background information on how was it being handled

16 currently, and that is how I got this.

17 Q All right. And under this memo it discusses, as

18 you said, making changes. There is so much technical

19 information in here. Can you describe to me the changes

20 that were contemplated in 1988 by looking at this memo?

21 A Yes, I can.

22 Q Okay.

23 MR. CARVER: Okay. Now, in this case you are not

24 asking her to testify from her own knowledge; you are

25 just asking her to translate the technical stuff in the

1   memo?

2   MR. RICHARDSON: If she could do that.

3   BY MS. RICHARDSON:

4   Q   Do you have any personal knowledge now that you

5   have this, and it has got your name on it and you reviewed

6   it?

7   A   The knowledge I have on this came when I first got

8   this memo and in further discussions with the person that

9   wrote this memo. I don't have personal knowledge from being

10   at this meeting. However, I think I can translate this for

11   you.

12   Q   Okay. So you discussed this with Joe, then, the

13   person at the bottom?

14   A   Yes, I did.

15   Q   Okay. Then please try, make an effort for me?

16   A   Generally speaking, what they were trying to do,

17   they had realized that the MOOSA refunds were all being

18   journalized to the one account code instead of to a

19   different one for each USOC. And they were trying to figure

20   out what they had to do in the existing, which is the

21   pre-regional MOOSA program, to accomplish making one refund

22   for each USOC, and, therefore, journalize them correctly.

23   And these are changes that they thought would accomplish

24   that.

25   Q   Okay. And were these changes implemented in

1   1988?

2   A   No.

3   Q   Do you know why they weren't implemented?

4   A   According to a note down here at the bottom, which

5   this is my handwriting -- let's see. No, that is not true.

6   Joe Jones told me that these were not implemented. And, no,

7   I do not recall why.

8   Q   That handwritten note, it was held up by national

9   or network?

10   A   By network, but that is talking about the fact

11 that MOOSA itself was not implemented in another state. It

12 wasn't talking about these changes.

13   Q   It wasn't referring to the changes?

14   A   No.

15   Q   Okay. All right. And I am going to have to take

16 us back one more time to Exhibit 2. I, evidently, didn't

17 finish all my business with that. And back to your

18 explanation of subtracting one from the date. I'm sorry to

19 backtrack like this. I should have had it together better

20 than that. You gave me an example of January 1 to January

21 3. If we have an example of January 1 to January 2, and we

22 subtract one, how many days do we get for out-of-service

23 credit?

24   A   You get one day of credit, and it shows up on the

25 bill as January 1 through January 1.

1   MR. RICHARDSON. Number 17 is "Minutes from MOOSA

2   Meeting, dated April 3rd, 1990." And Exhibit 18, which

3   I'm going to give out with this at the same time, is

4   "Notes for MOOSA Meeting, April 3rd, 1990."

5   (Exhibit Nos. 17 and 18 marked for

6   identification.)

7   MR. CARVER: Are these two separate exhibits or a

8   composite?

9   MS. RICHARDSON: They are two separates. The

10   minutes are Exhibit 17, and the notes are Exhibit 18.

11   MR. CARVER: Okay.

12   MS. RICHARDSON: They really go together, because

13   the minutes refer to the notes.

14 BY MS. RICHARDSON:

15   Q   Were you an attendee at this particular meeting?

16   A   (By Witness Miller) Yes.

17   Q   What I'd like for you to explain, Ms. Miller, is

18 the out-of-service verification process referred to in Issue

19 2?

20   A   I don't think I can explain it, because the

21 determination of the meeting was that this wasn't something

22 that I was going to pursue.

23   Q   What was the problem identified as? What was the

24 issue identified?

25   A   I believe it was referring to when the customer

ACCURATE STENOTYPE REPORTERS, INC.

1   calls in for a credit, how do you verify that he has been

2   out-of-service. And I believe this is referring to states

3   that do not have MOOSA.

4   Q   Okay. And under the notes from the MOOSA meeting,

5   Issue 2, it mentions two choices under Issue 2 for

6   verification of out-of-service, and one of them is an SB

7   online transaction, which appear as memos in IBOSS, and what

8   is that referring to, SB online transactions memos in IBOSS?

9   A   SB refers to Southern Bell, and I can't really

10 remember, except that I believe this means in the Southern

11 Bell online system which was called IBOSS you could hit a

12 key or enter a command or something, and it would tell you

13 the out-of-services that this customer had. I really don't

14 remember.

15   Q   Okay. And then can you help me with the other

16 choice, the second choice, the SCB online access through

17 BOCRIS, B-O-C-R-I-S, to LMOS?

18   A   Okay. SCB refers to South Central Bell, and

19 BOCRIS is the online system in South Central Bell, IBOSS in

20 Southern Bell, BOCRIS in South Central Bell. And I believe

21 that in South Central, through BOCRIS, you probably access

22 some screen or something, and it cuts you through to LMOS to

23 let you see the out-of-service on the customer. And that is

24 an assumption on my part, because I think this issue was

25 stated, as best I understood it, at the time.

1   Q   Okay. So, was there a problem, then, in being

2   able to verify when a manual report came through whether or

3   not that customer was out-of-service?

4   A   No. I don't think this refers to that, but I

5   really don't know. I think this is related to something

6   else. I think this is related to what kind of entry should

7   be made on the customer's account to indicate that he had an

8   out-of-service. Whether or not this was a state that had

9   MOOSA -- I don't really remember this in connection with

10   MOOSA in particular. This meeting covered more than just

11   MOOSA, and it got very confusing. I remember that.

12   Q   Was there any discussion as to why it might be

13   preferable for memos to go directly to CRIS and not BOCRIS?

14   A   I don't remember.

15   Q   Do you know how those two offices are structured?

16   Are they structured differently, CRIS and BOCRIS, different

17   purposes?

18   A   They are not offices. They are systems. And they

19   are directly related to each other. BOCRIS is simply an

20   on-screen representation of what is on the CRIS accounts

21   data base.

22   Q   Is it a smaller subset of CRIS?

23   A   I don't think so. I think it's the same thing.

24   It's just user-friendly, let's look at it on the screen.

25   Q   Okay. And CRIS is not a screen system, not a

1   screen system?

2   A   CRIS refers to the data base, really, and the

3   system by which we update service orders and miscellaneous

4   input to the data base.

5   Q   Okay. Can you look at Issue 3 and explain what is

6   being discussed with Issue 3?

7   A   I think we just were addressing everything

8   pertaining to MOOSA. And, at the time, only Florida had it.

9   And I think we were trying to address what would need to be

10   done if South Central Bell wanted MOOSA.

11   Q   So, there wasn't a problem with what Florida was

12   doing in terms of your mentioning the tape from LMOS into

13   the CRIS front end. It was just the problem was how to

14   regionalize that process?

15   A   Yes.

16   Q   Okay. And then under Number 4, what was the

17   problem there that was discussed?

18   A   I don't think it was a problem. I just think it

19   was just something that had to be addressed for

20   regionalization.

21   Q   Again, so there was no specific problem with the

22   system. We are just talking about branching it out to other

23   Southern Bell offices?

24   A   The whole purpose of this meeting, basically, was

25   how to take what exists in Southern Bell and make it

1 regional.

2   Q   Okay. And then Issue 5 goes back and addresses

3 again the journalization of the single codes, 110 for

4 residence and G70, and what to do about it, correct?

5   A   Yes.

6   Q   Okay. In Issue 5 there is a statement about

7 implementing MOOSA in Georgia and using the same logic that

8 was used in Florida. And then it says, "Which does not

9 include Joe's proposed changes." Are those the changes that

10 we discussed in that May 25th memo?

11   A   Yes.

12   Q   All right. And, again, that was the

13 regionalization changes?

14   A   No, these were the changes that were solved by

15 regionalization. But that meeting right there, the May 25th

16 meeting, was how to make those changes in the existing

17 Southern Bell system prior to regionalization.

18   Q   All right. But they were not made?

19   A   No.

20   Q   You don't know why they weren't made?

21   A   Well, this note here appears to state why they

22 were not made, which I did not remember this. But this does

23 appear to be the reason.

24   Q   And the reason is?

25   A   According to this note, it says, "This change was

1 never implemented because Joe never heard back from Lisa

2 Cauthren in Southern Bell Marketing Support after a problem

3 was brought up involving how credit USOCs would appear on

4 the bill."

5   MR. CARVER: Just to be clear, you are just

6   reading the memo. You don't have an independent

7   recollection?

8   WITNESS MILLER: Well, I remember having read it.

9   I remember it now, but, no, I didn't remember it

10   before.

11 BY MS. RICHARDSON:

12   Q   Okay. Do you have any idea how decisions on

13 whether or not to implement changes are made? Is there some

14 kind of cost/benefit analysis done on whether or not a

15 change ought to be put into place now in a system in

16 Southern Bell?

17   A   (By Witness Miller) I have no knowledge of that.

18   Q   Okay. So, what you do in this particular meeting,

19 or meetings that you have been in, is to discuss changes

20 that are coming up. You have not in any of those meetings

21 ever discussed a cost/benefit analysis with a particular

22 change referred to?

23   A   No.

24   Q   Okay. Do you have any knowledge as to why Lisa

25 Cauthren decided not to go with Joe Jones' changes back in

1   '88?

2   A   Yes, I do.

3   Q   Why?

4   A   Now that I remember it, I believe that Joe and

5   Lisa were each waiting for the other one to call them back.

6   Q   Something as simple as that?

7   A   Yes.

8   Q   Okay. Ms. Miller, were you part of a MOOSA task

9   force in August of 1991?

10   A   I'm not sure.

11   (Exhibit Number 19 marked for identification.)

12   BY MS. RICHARDSON:

13   Q   Ms. Gargiulo, that question also applies to you.

14   Were you part of a task force, a MOOSA task force, in August

15   of '91?

16   A   (By Witness Gargiulo) I'm not sure. I mean, I

17   didn't serve on something called a task force. I have to

18   answer like Kathryn did.

19   Q   Did you serve on something in '91 dealing with

20   MOOSA, a team kind of program?

21   A   No. I was used as a resource, and somebody might

22   have questioned me about something, but no team or anything.

23   Q   Do either of you know a Judith M. Rhea that's

24   mentioned in this particular memo dated August 9, 1990

25   (sic).

1   A   (By Witness Gargiulo) Yes, I do.

2   A   (By Witness Miller) I've heard of her.

3   Q   Can you identify her for me?

4   A   (By Ms. Gargiulo) I believe she is on our

5 headquarters customer services staff, but I'm not sure what

6 her subject matter is that she handles.

7   Q   Do either of you know a Janice Long that's

8 mentioned in this memo, copy to?

9   A   (By Witness Gargiulo) I've heard of her.

10   A   (By Witness Miller) I've heard her name.

11   Q   Okay. And identifying the sender of the memo is a

12 Lisa Cauthren, do either of you know Ms. Cauthren?

13   A   (By Witness Gargiulo) Yes.

14   A   (By Witness Miller) Yes.

15   Q   And what does she do?

16   A   (By Witness Gargiulo) She is on our customer

17 services staff in headquarters; and she was, up until, I

18 think, October 1st, the MOOSA subject matter expert.

19   Q   October 1st of '92?

20   A   Yes, I believe she just changed jobs. Did she?

21   A   (By Witness Miller) Yes, she did.

22   Q   Are either one of you familiar with the

23 information contained in this exhibit, having looked through

24 it?

25   A   (By Witness Gargiulo) I am familiar with the

1   statements, because some of those requests became part of

2   the new procedures. But I'm not familiar with the actual

3   design change proposal or anything but what resulted from

4   it.

5   Q   Have either one of you seen this memo before?

6   A   (By Witness Miller) No.

7   A   (By Witness Gargiulo) No.

8   Q   Okay. So, you have no personal knowledge of the

9   memo?

10   A   (By Witness Gargiulo) That's right.

11   A   (By Witness Miller) No.

12   Q   It does say that the subject was "MOOSA/VP Called

13 Task Force/Required System Changes." Do you have any idea,

14 is VP vice president? There are so many acronyms in the

15 company. Is that an acronym that's a typical company

16 acronym that you would be aware of?

17   A   I would presume that's what it means, but I would

18 just have to presume that.

19   Q   Okay. And there is another acronym in that first

20 paragraph, the last three letters, DCP. Do either of you

21 know what DCP is?

22   A   (By Witness Gargiulo) Yes.

23   A   (By Witness Miller) Uh-huh.

24   Q   Ms. Miller, can you identify?

25   A   It stands for design change proposal.

1   Q   And then it identifies in that second paragraph,

2   Ms. Gargiulo, you said you recognized these three items

3   because they became part of the changes. Can you kind of

4   explain each one, 1, 2 and 3, then?

5   A   (By Witness Gargiulo) The entry as it's -- when

6   the MOOSA passes from LMOS, it puts a notation on the memo

7   screen on BOCRIS, indicating that an out-of-service

8   adjustment, a MOOSA adjustment has been processed through.

9   And it was just going to include the line number, which I

10   don't believe line numbers have been included prior to that.

11   The second one was just a positive report that would come

12   across the printer to indicate that no MOOSAs were sent that

13   day. And the third one was the reconciliation report,

14   basically.

15   Q   And that was your particular area of expertise?

16   A   Well, the manual handling piece is my particular,

17   because that drops to the customer services center.

18   Q   Okay. And then looking at the bottom, the last

19   sentence says, "Again, this project is being handled on an

20   expedited basis per an officer level directive." I know you

21   weren't involved, and you probably can't answer this, but do

22   you have any idea of who the officer level directive was

23   that instituted these changes that you are aware of?

24   A   No.

25   Q   Do you know or have any knowledge as to why these

1　changes were made, and especially on an expedited basis?

2　　　A　No.

3　　　Q　What is an LTERM that was mentioned in Number 2,

4　when you said "printer"? Is it just the name for a printer?

5　　　A　It's the ID, the printer ID for that particular

6　printer.

7　　　Q　All right. If you could turn back several pages,

8　and I wish these had been numbered. If you want to go from

9　the back, it's 1, 2, 3, it's the fourth page from the back.

10　At the top it says, "Example of current BOCRIS memo for

11　out-of-service." Okay. And in that it is giving an example

12　of what comes across BOCRIS for an out-of-service, and it

13　lists several things: A completion date, an out-of-service

14　date, a restoral date, LMOS line IDs and so on. The

15　out-of-service date, is that picked up from the LMOS data,

16　do you know, in BOCRIS, when the BOCRIS memo comes across?

17　　　A　It would be picked up from the LMOS data, right.

18　This is what winds up on the BOCRIS memo.

19　　　Q　Okay. And the restoral date, is that the time of

20　the clear date for the out-of-service?

21　　　A　That is the restoral date, as it shows that LMOS

22　passes.

23　　　Q　Okay. And the last, the second-to-the-last page,

24　it says, "BellSouth Services, Design Change Proposal, RF61,"

25　at the top. And down toward the middle in the description

1   it says, "Begin transmitting a new report type, Report Type

2   19, if available," titled MOOSA Reconciliation Report, and

3   that was to be delivered to the printer in the CODB. What's

4   a CODB?

5   A   It stands for central office data base.

6   Q   And is this Report Type 19 the same as the

7   reconciliation report we saw in the CRIS user guide that we

8   talked about earlier?

9   A   Yes.

10   Q   So, this is the design change for that report?

11   A   To ask for the reconciliation.

12   Q   Okay. And then on the last page there is a note,

13 the first note at the bottom, "There should be no page

14 breaks between COs." Is that central offices?

15   A   (By Witness Miller) Yes.

16   A   (By Witness Gargiulo) Uh-huh.

17   Q   So, central offices are all clumped together on

18 this report, then, the reconciliation report?

19   A   (By Witness Gargiulo) Right.

20   Q   Within each central office are the MOOSAs. If I'm

21 going to look at a reconciliation report, would I see

22 Central Office 1, and its entire set, and then I would go to

23 Central Office 2, and see its entire set, and Central Office

24 3 and its entire set?

25   A   Yes.

1   Q   So, they are grouped there. So, if I wanted to

2   look at any particular exchange, all I would have to do is

3   locate the central office on a reconciliation report, and I

4   could audit or whatever I wanted to do with that central

5   office?

6   A   That is correct.

7   Q   Okay. Is it easier to spot problems that are

8   generated by a particular central office group when you look

9   at reconciliation reports if something appears out of

10   normal?

11   A   Yes.

12   Q   Have you noticed that at all with any of the

13   reports that you have handled?

14   A   No.

15   Q   Okay. Would it be easy, then, looking at that to

16   see if maybe one central office was generating a much

17   greater number -- I think you said there were 25 to 50

18   average MOOSAs daily. If a central office was generating

19   75, would that throw a red flag to somebody?

20   A   The reconciliation report does not list everything

21   that was generated. It just lists everything that was

22   generated 14 days prior to the bill date and was not worked

23   to the bill.

24   A   (By Witness Miller) And it is only for a specific

25   billing period as well.

1   Q   Okay.

2   A   (By Witness Gargiulo) So, all that it tells me is

3 what hasn't been credited to the customer's bill.

4   Q   All right. What is an average number of lines

5 that you might get on a reconciliation report in any

6 particular day?

7   A   Very few now, you know, maybe one or two on a

8 billing period, many times zero.

9   Q   Okay. And is that because the process is almost

10 completely mechanized at this time?

11   A   Because we centralized it into my group, and we

12 have a real good handle on it, and get everything processed

13 out. So very rarely does anything get delayed in my center.

14 So, consequently, it doesn't cause a problem and, you know,

15 for comptrollers, either. So, unless there is a delay there

16 or it would get lost in the mail or we would not get it for

17 some reason, that's usually, you know, how it winds up on

18 the reconciliation report.

19   A   (By Ms. Miller) The process is no more mechanized

20 now than it was. It doesn't indicate anything in reference

21 to that.

22   Q   All right. What about multi-line accounts, are

23 they not mechanized? Are they still handled strictly as

24 manual outputs?

25   A   (By Witness Gargiulo) Right, uh-huh. This just

1   tells you something wasn't handled that was sent to you.

2   Q   Okay.

3   MS. RICHARDSON: Exhibit 20 is an 8-21-91 E-Mail

4   from Kathryn Miller to Nancy Yoder.

5   (Exhibit Number 20 marked for identification.)

6   BY MS. RICHARDSON:

7   Q   Ms. Miller, in the third paragraph --

8   A   Uh-huh.

9   Q   You say, "Now to the current problem. Perhaps you

10   know that MOOSA has been audited in both Florida and

11   Georgia"?   What audits are you referring to?

12   A   (By Witness Miller) I guess I'm referring to

13   whichever one preceded the changes in '91. I think all I

14   knew was there that had been one.

15   Q   Okay. And what group did they audit?

16   A   I don't know.

17   Q   What other information about the audit did you

18   have?

19   MR. CARVER: Before you answer that, I'm not sure

20   if that is the demand audit that was done by Shirley

21   Johnson at the request of legal. If it is, then our

22   position is that it's part of the investigation, and we

23   would assert the attorney/client privilege for it. So,

24   if you have any specific information about the

25   substance of that audit --

1   WITNESS MILLER: I don't, anyway.

2   MR. CARVER: Okay. Just to finish my sentence, if

3   you did, I would have asserted it was attorney/client

4   privilege. But since you don't, the point is moot.

5   WITNESS MILLER: All I know is we heard there was

6   one, and it got everybody up in arms, as you might

7   imagine.

8   BY MS. RICHARDSON:

9   Q   Okay. Do you have any idea why?

10   A   (By Witness Miller) Why it was done?

11   Q   Uh-huh.

12   A   No.

13   MR. CARVER: Don't answer those.

14   BY MS. RICHARDSON:

15   Q   Okay. Do you have any idea why everyone was up in

16   arms?

17   MR. CARVER: Don't answer.

18   MS. RICHARDSON: Okay. I need to know for the

19   record that you are not answering on advice from

20   counsel that what you are about to say is

21   attorney/client privilege.

22   MR. CARVER: Well, let's back up a little bit and

23   do it this way. I mean, if she doesn't have any

24   information, then I don't need to make the objection.

25   So, why don't you just say, yes, you know something

1   about it, or, no, you don't. And if you say, yes, you

2   do, then I will make the objection. And we can put on

3   the record that I won't let her answer. But I think

4   what she is trying to say is that she doesn't know

5   anything about it. And if that is the case, then there

6   is no need for me to object to her saying she doesn't

7   know anything about it.

8   MS. RICHARDSON: She said it got everyone up in

9   arms, and --

10   WITNESS MILLER: The word "audit" does that.

11   That's what I meant by that.

12 BY MS. RICHARDSON:

13   Q   Okay. That an audit is a unique happening in the

14 company, so that when someone is audited in the company,

15 people get up in arms?

16   A   (By Witness Miller) People pay attention.

17   Q   People pay attention to the results of the audit?

18   A   Just to the fact that there was one. I have no

19 knowledge of the results.

20   Q   Okay. Do you have any knowledge of what --

21 whether any changes or solutions, any changes were made to

22 the system after that audit?

23   A   Since I don't know what audit we are talking

24 about, I really can't answer that.

25   Q   Do you know whether CRIS provided the auditors any

ACCURATE STENOTYPE REPORTERS, INC.

1   particular information?

2   MR. CARVER: For which audit?

3   MS. RICHARDSON: For the 1991, September '91 audit?

4   A   (By Witness Miller) I have no idea.

5   A   (By Witness Gargiulo) I don't know anything about

6   the audit. I can't answer one way or the other.

7   (Discussion off the record.)

8   (Exhibit Number 21 marked for identification.)

9   BY MS. RICHARDSON:

10   Q   Okay. Can you tell me, is there an officer level,

11   an individual at the officer level who is in charge of the

12   MOOSA branch, of the MOOSA processing, the MOOSA system

13   within the company, do you know?

14   A   (By Witness Miller) I don't know.

15   A   (By Witness Gargiulo) No.

16   Q   Looking at the exhibit I just gave you, this

17   appears to be changes to LMOS and MOOSA in 1992. Are you

18   familiar with these, the changes that were made that are

19   listed here?

20   A   (By Witness Miller) I am familiar with the ones

21   that ended up affecting CRIS, as well.

22   A   (By Witness Gargiulo) I am familiar with No. 2 of

23   the first part, "Add tracking number to each MOOSA record."

24   Q   Okay. And that is the LMOS tracking number that

25   you referred to earlier?

1   A   (By Witness Gargiulo) Uh-huh.

2   Q   Okay. Will you explain those changes in the first

3 four, any of those? You've got Number 2 already there, and

4 that is the LMOS tracking number. What about this one from

5 MOOSA records to CRIS?

6   A   (By Witness Miller) Are you talking about No. 1?

7   Q   Uh-huh.

8   A   I think this came up already.

9   Q   We have already done this?

10   A   Yes.

11   Q   Okay. Then let me get down to one specific

12 question I think I may have on this. Other than the ones

13 that are listed, do you know of any other changes that have

14 gone into effect in the MOOSA program?

15   A   Well, since these charges are referring to the

16 LMOS MOOSA program, I'm not knowledgeable of any of those

17 changes, anyway.

18   Q   What about at the bottom, "The following change

19 was made to MOOSA: Started cycling troubles for two days,"

20 and then the second one, "Corrected the following bugs."

21 Can you explain what any of those following bugs were,

22 "Started populating the account number file with the correct

23 data"? Both of you are saying "no."

24   A   (By Witness Gargiulo) No.

25   Q   What about "Removed the multi-line records check

1 from the program"?

2   A   (By Witness Gargiulo) No.

3   A   (By Witness Miller) No.

4   Q   "Removed the Key System check from the program"?

5   A   (By Witness Gargiulo) No.

6   A   (By Witness Miller) No.

7   Q   "Remove the customer code equal to zero check from

8 the program"?

9   A   (By Witness Gargiulo) No.

10   A   (By Witness Miller) No.

11   (Exhibit No. 22 marked for identification.)

12 BY MS. RICHARDSON:

13   Q   Okay. This is a page from a Public Service

14 Commission audit done in Gainesville. Can you explain how

15 the problem of an out-of-service trouble on an incomplete

16 service order could occur?

17   A   (By Witness Miller) I don't even understand the

18 question.

19   Q   Okay. Well, go ahead and read it.

20   MR. CARVER: What is this now?

21   MS. RICHARDSON: The Florida PSC conducted a

22   review of the mechanized out-of-service rebate program

23   in the Gainesville, Florida Maintenance Center. This

24   may be a company document. I'm not sure. I just have

25   this in my file as is.

1   MR. CARVER: That is what I was asking, if it came

2 from the company or somewhere else.

3   MS. RICHARDSON: It refers to a PSC audit.

4   MS. WILSON: Was this produced by the company in

5 response to a production request?

6   MS. RICHARDSON: Uh-huh.

7   WITNESS GARGIULO: I noticed it was stamped,

8 "Received, Office of Public Counsel." I don't know if

9 you stamp all of your things that you receive from the

10 company.

11   MS. RICHARDSON: This is August of '91, now. We

12 do receive -- when we would do some of these, we don't

13 receive all of them. We don't stamp all of them, but

14 we do stamp some of them that come in.

15   MR. CARVER: But you do that on a POD, it's like a

16 mail stamp or something?

17   MS. RICHARDSON: Well, now, I don't know. I

18 really don't know. I wish I could tell you. That

19 would be a good question. I don't have the original

20 record file with me on this, so I can't answer that

21 question.

22 BY MS. RICHARDSON:

23   Q   If you are unable to answer the specific problem

24 how something could happen --

25   A   (By Witness Gargiulo) Repeat your question again.

1   I think I can now.

2   Q   All right. Can you explain how the problem of an

3   out-of-service trouble on an incomplete service order could

4   occur?

5   A   Yes,.

6   MR. CARVER: Before you answer, let me ask you

7   this. Since I don't know what the source of this is or

8   whether this is a company document or whatever, I mean,

9   you can go ahead and answer it. But if you are basing

10 your answer entirely on subjects that are included

11 here --

12   WITNESS GARGIULO: No.

13   MR. CARVER: Okay. So this is on your personal

14 knowledge? Okay, fine.

15   A   (Continuing by Witness Gargiulo) When a customer

16 places an order, if it indicates that no field visit is

17 necessary -- in other words, the installer does not need to

18 go out to activate the service, we tell the customer that

19 they should have their service working by X-time, and it is

20 changed, so, I'm not sure what time by X-time, and if it's

21 not working that they should call repair. So, if the

22 customer called into repair, and for some reason his order

23 was not completed because of a facility problem or any

24 number of reasons, that would cause an order to have not

25 been completed, and the customer to call into repair for a

1   trouble report.

2   Q   Okay. Were there any changes made, then, to that

3   from '90 to today, or is that still the same? Was it the

4   same in '90 as it is now?

5   A   To the best of my recollection, yes, I believe we

6   were telling the customers in '90 to call in. I'm just not

7   sure at what time. We have changed the time when we told

8   them to call in, but yes.

9   MS. RICHARDSON: 23 is a memo to "Managers -

10   Customer Services (Georgia and Florida), dated July

11   30th (sic), 1990.

12   (Exhibit Number 23 marked for identification.)

13   BY MS. RICHARDSON:

14   Q   And if you will look at Page 1, Paragraph 2. I'm

15   sorry, go on over to Page 2 and Paragraph 3. Actually, it

16   starts up there with Paragraphs 2 and 3, I think. We are

17   talking about the "OUT" entry.

18   "We would also like to take this opportunity to

19   clarify MOOSA processing. Several questions have arisen

20   since implementation in Georgia."

21   A   (By Witness Miller) I'm sorry, I don't think we

22   have the same.

23   Q   You don't have the same. All right. Oh, I'm

24   sorry. It's at the bottom of Page 1, okay, and the first

25   paragraph on Page 2.

1   Okay. First of all, if the outage was coded as

2   partial, the "OUT" type code will not appear on IBOSS and

3   MOOSA. Do you know what that is?

4   A   I don't.

5   Q   An "OUT" type code?

6   A   (By Witness Gargiulo) I believe it's the memo

7   notation that shows now on BOCRIS but was then on IBOSS.

8   Q   Okay. And then that next paragraph, "If the MOOSA

9   entry falls out for manual handling on either the CRIS or

10 LMOS reports, an "OUT" entry will not automatically flow

11 through to the IBOSS memo." Can either of you explain what

12 that problem is?

13   A   It's not a problem. It's just that if it falls

14 out for manual handling, then the business office will

15 prepare the manual handling report, and they will make the

16 necessary IBOSS, what it refers to here, but now BOCRIS

17 notations.

18   Q   Okay. So, it was IBOSS and now it's BOCRIS.

19   A   It's IBOSS.

20   Q   So, those two things are basically the same?

21   A   Exactly, yes.

22   Q   And then under that next paragraph, "We have

23 received complaints from the CRSAB that contact personnel

24 are calling repair clerks asking that they enter trouble

25 tickets to generate MOOSA credits." Are you familiar with

1 that process being done?

2   A   No.

3   Q   Okay. And in terms of the taxing codes that are

4 mentioned on the first page and in Paragraph 3, okay, saying

5 that they should be manually entered. And this was in 1990.

6 Are taxing codes, the TAR code, still manually entered? Do

7 you know?

8   A   Yes, it's the TAR code.

9   Q   Okay. And they are still manually entered? It's

10 not done by a mechanized --

11   A   When it comes out on a manual handling report.

12 And there is a section there that says TAR code, and they

13 have to put in the TAR code.

14   Q   Okay. Now, if a report goes through the

15 mechanized section in MOOSA, and it doesn't fall out for

16 manual handling, will the system plug in the correct TAR

17 codes by itself?

18   A   (By Witness Miller) Yes.

19   Q   Is that a change from 1990?

20   A   No.

21   Q   So, the system had always handled mechanically the

22 TAR code?

23   A   Yes.

24   MR. BAER: You still have a problem with that,

25   though, right?

1   WITNESS MILLER: The problem was not with the TAR

2   code. The problem was with the account code, which was

3   how it was journalized. TAR code is how it's taxed.

4   MS. RICHARDSON: 24. Exhibit 24 is CRIS Accounts

5   Release 22 for MOOSA.

6   (Exhibit Number 24 marked for identification.)

7   (Discussion off the record.)

8 BY MS. RICHARDSON:

9   Q   Okay. Ms. Miller, I believe you are identified in

10 this particular exhibit as the coordinator or originator, is

11 that accurate?

12   A   (By Witness Miller) It certainly is.

13   Q   Okay. It seems in this particular exhibit to

14 indicate that certain program modifications were made to

15 MOOSA or contemplated in 1990, is that true?

16   A   I will have to explain that. What this is, this

17 is the documentation to implement the regional version of

18 the MOOSA logic in preparation for regionalization of the

19 CRIS system. Okay. The data on this, these documents are

20 written far in advance of when they were implemented,

21 because they have to be system-tested by all the

22 programmers. So, this was the logic that would be

23 implemented in March of '91 in Jacksonville, and in May of

24 '91 in South and Southeast Florida.

25   Q   So, a full year in advance, then, all of this

1   preparation work is being done?

2   A   Oh, yes.

3   Q   Okay. Were the changes that are in this document

4   actually implemented, then, in the '91?

5   A   Yes.

6   Q   Okay. Do you know why these changes were

7   contemplated? Is it just because of regionalization or was

8   there some other problem that they were designed to deal

9   with?

10   A   The regional version of MOOSA was designed to

11   correct any known problems in the Southern Bell version of

12   MOOSA.

13   Q   All right. And when you say any "known problems,"

14   how would those problems percolate up to your group to be

15   identified?

16   A   Because everything in all of CRIS was looked at in

17   the process of regionalization. And MOOSA was looked at as

18   a subject, and we took it from A to Z: How do you do it

19   now, and what do you know, what holes exist that you know

20   of, and what are we going to do about them?

21   Q   And were you on a particular group that did that?

22   A   There was a manager level group that sort of rode

23   herd, if you will, over all of the various regional issues.

24   Q   And were you a party to that group?

25   A   Yes.

1   Q   And so they looked at all problems in Florida?

2   A   No.

3   Q   Because Florida was the state that was using

4 MOOSA?

5   A   No, what they were doing was looking at everything

6 pertaining to regionalization. And within that, MOOSA was

7 one of the subjects. And within that, we looked at

8 everything, any loose ends that may have been known at that

9 time with the idea that the new system would be better than

10 the old one.

11   Q   And how did you identify the loose ends? How were

12 they identified?

13   A   Talked to programmers, I guess.

14   Q   Was some kind of audit, or system audit or

15 whatever done at that time?

16   A   No.

17   Q   What loose ends do you remember?

18   A   The problem about the journalization, which was

19 corrected.

20   Q   What other problems?

21   A   And the problem about the installment credits not

22 be taken into account are the two major ones that I

23 remember.

24   Q   No problem with the taxing code logic and how that

25 was done?

1   A   No.

2   Q   I need to show you, if I can find it quickly

3 enough, Exhibit 25.

4   (Exhibit Number 25 marked for identification.)

5   MR. BAER: Who was the person above the managers

6   that asked the managers to get together and discuss the

7   problem?

8   WITNESS MILLER: Pardon me? There wasn't a person

9   -- there wasn't one person over this.

10   MR. BAER: You all just decided to get together?

11   WITNESS MILLER: No. It was addressed because of

12   the CRIS system being regionalized. Everything in CRIS

13   was addressed. And this was just one of them. Every

14   subject matter in CRIS was looked at to see how are we

15   going to do this regionally, and what needs to be done

16   differently, if anything. MOOSA was no exception.

17 BY MS. RICHARDSON:

18   Q   Okay. Exhibit 25 is covered by a letter from

19 Mr. Easterling to a Mr. T.W. Robinson, and includes in that

20 exhibit an audit done in October of 1989. And if you could,

21 I'd like for you to turn -- let me see if I can find it --

22 to Page 3, and under,

23

24   A   (By Witness Miller) Can you tell me -- can you

25 kind of direct me to where we are?

  1   Q   I'm on Page 3, Number 2 of --

  2   A   Oh, okay. It's big as life. I've got it.

  3   Q   I do that, too. I never read the headings of

  4 things. (Pause)

  5

  6

  7   A   I don't see anywhere in here where it says this is

  8 in connection with

  9   Q   I guess we need to go back to the very

 10 introduction.

 11

 12   et cetera. And in Mr. Easterling's

 13 letter,

 14   ." So,

 15 perhaps I'm wrong. I thought this dealt with -- and in the

 16 introduction, Paragraph 3,

 17

 18 :

 19

 20

 21

 22   A   One of the reasons I'm questioning this is because

 23 this is talking about   is

 24

 25   Q   Right.

1   A   ~~[illegible]~~   So, I
2   do not --
3   Q   Okay. So, this does not at all apply?
4   A   I don't believe so, no.
5   A   (By Witness Gargiulo)
6   I believe.
7   Q   Okay.
8   A   (By Witness Miller) And   would just be one
9   category of those.
10 A   (By Witness Gargiulo) Right.
11 Q   So then the findings for MOOSA are restricted to
12 Page 2?
13 A   (By Witness Miller) It appears --
14 A   (By Witness Gargiulo) Number 1.
15 Q
16
17 A   No.
18 Q   Okay. So, it didn't apply at all to what you were
19 doing in the
20
21 A   No; no, it does not.
22 Q   Okay.
23
24 that you discussed in your meeting --
25 A   No.

1   Q   -- when you were discussing

2

3   A   No, because

4   anyway. I don't think anything was

5   done different pertaining to   there.

6   (Exhibit Number 26 marked for identification.)

7   BY MS. RICHARDSON:

8   Q   Okay. And this came with your group of exhibits

9   that you brought with you. It is a September 20th, 1991

10   memorandum to operation managers. And, Ms. Miller, I

11   believe you are copied on this particular exhibit?

12   A   (By Witness Miller) Yes.

13   Q   And I believe you have already told me that you

14   are familiar with the MOOSA procedures that were in

15   operation in September of '91?

16   A   Yes.

17   Q   All right. And then this document is familiar to

18   you. Could you look at the reports on Pages 6 and 8, I

19   think. On Page 6, under CRIS manual handling report -

20   processing --

21   A   It's a short page?

22   Q   Yes, it's a short page.

23   A   Okay.

24   Q   "Under no conditions should a mechanized

25   miscellaneous adjustment be issued. If an MMA is issued, a

1 MOOSA OC&C credit will not be reflected on the customer's

2 statement; thus, a MOOSA audit trail will not exist." Can

3 you explain what is going on there?

4   A   (By Witness Gargiulo) I'll address that, because

5 this is our procedures. There was some confusion at some

6 point and occasionally service reps were issuing MMAs

7 instead of letting MOOSA handle it. So, this was just once

8 more pointing out that, "No, we have a MOOSA process to

9 handle it. Do not do it via the MMA. If you get a manual

10 handling, then you will do it that way."

11   Q   What is a mechanized miscellaneous adjustment?

12   A   It's an adjustment process that we have to adjust

13 local service and different --

14   A   (By Witness Miller) It's something that --

15   A   (By Witness Gargiulo) -- pieces of the customer's

16 account.

17   A   (By Witness Miller) And it results in an

18 adjustment to the bill. It does not result in an OC&C on

19 his bill.

20   A   (By Witness Gargiulo) Right.

21   Q   Okay. So, if I could come up with an example.

22 For instance, a customer calls in and decides he no longer

23 wants call forwarding, would an MMA be done?

24   A   (By Witness Gargiulo) No. An MMA wouldn't be done

25 there. A good example would be what you asked earlier. If

1 a customer said, "I was out of service," and no MOOSA was

2 processed on that customer's account for some reason, we

3 don't have any indication that the customer was out of

4 service. But the customer does say, "I was out of service

5 for two days. Then we may just go ahead and give that

6 customer an out-of-service credit. Or maybe there is some

7 indication that there was some problem, but there was never

8 really a trouble report and repair. So, therefore, MOOSA

9 didn't come through. We will do it via an MMA.

10   Q   Okay. So, if there is any LMOS history,

11 basically, then --

12   A   MOOSA will handle it.

13   Q   -- it's going to be a MOOSA handling, and that

14 could end up with the reconciliation report or any number of

15 other reports that come through that processes, is what

16 you're saying. But if it's just a customer calls in and

17 complains, and he had not filed an official trouble report,

18 then the company may, out of the goodness of their heart, go

19 ahead and do that on an MMA?

20   A   Right.

21   Q   Okay. Then the MMA blocks an audit trail, from

22 going back --

23   A   Exactly, because it does not generate an OC&C

24 credit. It just generates a credit against a customer's

25 bill. So, there is no OC&C.

1   (Off the record.)

2   (Exhibit 27 marked for identification.)

3   BY MS. RICHARDSON:

4   Q   Again, this may be a copy of something we have

5   already seen, but with a lot more pages attached to it.

6   It's the CRIS Accounts Release 22. And, Ms. Miller, I

7   believe I have you on there as the coordinator/originator?

8   A   (By Witness Miller) That is correct.

9   Q   All right. Is this the full, complete document of

10   this Release 22?

11   A   Yes, it is.

12   Q   All right. And what I've shown you before was

13   maybe just portions of it?

14   A   It was the general description portion at the

15   front and then one selected other page. This is the entire

16   document?

17   Q   Okay. And toward the back here that we didn't

18   have earlier, where we are getting into data

19   dictionary/record layout changes, can you tell me the

20   purpose of each one of those program modifications? Is this

21   for a systems person to look at?

22   A   Yes.

23   Q   And make various changes in the actual program,

24   the software?

25   A   Yes.

1   Q   Okay.

2   A   (By Witness Gargiulo) The purpose of a program

3 modification is to be used by a programmer or programmers.

4   Q   Okay. Let me see. I've got that. I think I had

5 one other question. Is this, then, the 1992 version? Do

6 you know?

7   A   I don't know.

8   Q   It says 1992 on the bottom.

9   A   Let me find the other one, and see what the deal

10 is here.

11   Do you have the other one with just the two pages?

12 The other one was dated 1990 and was labeled, "Revision 1."

13 This is dated '92 and was labeled, "Revision 3." So, it is

14 the same document.

15   Q   Okay. Were there any differences between Revision

16 1 and Revision 3?

17   A   There would have been some or there would not have

18 been a revision.

19   Q   Okay. So, when I go through, then, if I compare

20 whatever is different in this from the first one, will be

21 revisions that were made?

22   A   Yes.

23   Q   Do you know if the audit that you had referred to

24 earlier in a memo that you were aware of that raised

25 everybody's hands, had any impact on this revision, or was

1   this also just regionalization?

2   A   It did not have any impact on it. The normal

3   method of working a program modification is you design it,

4   you gather all the programmers. You have what we call a

5   "walk through," anything that was left out, anything that

6   anybody asks that might need to be added, so there will be

7   -- complete documentation will get added, thus you will have

8   a revision. It's very normal to have several revisions to a

9   program modification during the design and testing phase.

10   Q   Okay. Is this something that's done every year?

11   Is it an annual basis that these groups get together and

12   look at MOOSA and figure out what problems there are and

13   what changes need to be done?

14   A   No, that's not done like that. This was

15   specifically connected with Release 22, which was the

16   regionalization release.

17   Q   Okay. Have these changes actually been

18   implemented in '92 that are on this document?

19   A   Yes.

20   Q   I think you told me for the '90 document that it's

21   usually about a year out before the changes go into effect?

22   A   No, a year out is about when you start designing

23   it.

24   Q   Okay. So, this was designed in '91?

25   A   Well, the first design was in '90, because that is

1   how the program modification is dated. All this means is

2   that some change was made to this document, and it was

3   reprinted on June the 18th. That is actually a print date.

4   Q   Okay. But the Revision 3 puts me on notice?

5   A   Yes. And in Paragraph 5.01 it says that this was

6   sent out effective with CRIS Release 22. So, these program

7   changes would have gone out. This may have been a

8   documentation only change, because I don't see any change

9   bars even in it. I think probably somebody just printed a

10   new version of it, and that is why it has got a '92 date on

11   it.

12   Q   Okay.

13   A   Because the system will automatically put the date

14   that you print it.

15   MS. RICHARDSON: Okay. I think I can let you go.

16   I'm sorry. Did you have a quick question?

17   MR. VINSON: Yes, I have a couple of questions,

18   I'd address to both witnesses, but I think they might

19   be best answered by Ms. Gargiulo.

20   CROSS EXAMINATION

21   BY MR. VINSON:

22   Q   Referring to Exhibit 21, which was a list of

23   changes, and I just would -- maybe it would help to read it

24   to you real quickly, the one I'm interested in. It says,

25   "Effective around the first week of October the following

1   changes were made to the LMOS MOOSA processing." I think

2   from the context of this exhibit it is October 1991 that's

3   being referred to. Then No. 1 there it says, "LMOS started

4   passing all MOOSA records to CRIS." Could you answer what

5   was the previous process if this is a new change?

6   A   (By Witness Gargiulo) No, I can't at all.

7   Q   Ms. Miller?

8   A   (By Witness Miller) No. This is the same thing

9   that came up earlier that we don't remember or we don't know

10   what they were not passing before.

11   Q   Skipping down to the middle of that same first

12   page of the exhibit, effective January 16th, 1992, the

13   change noted is that rebates were awarded for disposition

14   codes of 090X and 10XX. Do you know what those disposition

15   codes refer to?

16   A   (By Witness Gargiulo) No, I don't.

17   Q   On a separate subject matter, does MOOSA currently

18   exclude from rebates troubles that were bulk status? Does

19   that term ring a bell?

20   A   I've heard the term, but I don't really -- you

21   know, it's one of those terms I've heard.

22   Q   Ms. Miller, does that mean anything to you?

23   A   (By Witness Miller) No. I think that is an LMOS

24   question.

25   MR. VINSON: Those are the only questions I have.
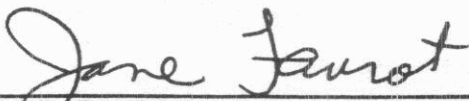
1   MS. RICHARDSON: Thank you.

2   (The deposition was concluded at 3:30 p.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)

COUNTY OF LEON)

I, JANE FAUROT, Court Reporter, Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that the foregoing proceedings was taken before me at the time and place therein designated; that before testimony was taken the witness/witnesses were duly sworn; that my shorthand notes were thereafter reduced to typewriting; and the foregoing pages numbered 1 through 121 are a true and correct record of the proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

WITNESS MY HAND AND SEAL this 30th day of November, 1992, in the City of Tallahassee, County of Leon, State of Florida.

JANE FAUROT, Court Reporter
Notary Public in and for the
State of Florida at Large

My Commission Expires: July 16, 1993

MECHANIZED OUT OF SERVICE ADJUSTMENTS   — CRIS

MANUAL HANDLING REQUIRED

NPANXX: 407668   CS: BUS   CYCLE: 8272   CYCLE DATE: 01-27-92

NPA CO	LINE NO.	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE
LMOS LINE ID NUMBER						LMOS TRACKING NUMBER		
	113		920121	000900	910427	910422	14.05	3213
					39687635			

adj 4/6

— NPU 175
— 1FR 882
— 9cm 350

APPROVED _Sylvia Watler_ , _SVC Rep_ (TITLE) 2-17-92 DATE

RCV'D FEB 19 1992

MECHANIZED OUT OF SERVICE ADJUSTMENTS   — CRIS

MANUAL HANDLING REQUIRED

RCV'D APR 03 1992

NPANXX: 407381   CS: BUS   CYCLE: 0312   CYCLE DATE: 03-23-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE
LMOS LINE ID NUMBER						LMOS TRACKING NUMBER		
	549		920320	000901	920318	920319	28.00	HM00
						45100463		

35.00 adj 4/15

1FB, TTB, ̶I̶F̶T̶, 9ZR, ̶6̶H̶0̶0̶
28.00   1.00   600

APPROVED: _Joyce Moss_ , _Bus Svc_ (TITLE) 03-31-92 DATE

1 2-3 4-5   6-8   9-11   12-15   16-18   19-24   28   66-68 69-71   82 83-85   117-122   129-137   138-143   144-149   218   219-238

| REC | ORIG | PSWD | ACCOUNT IDENTIFICATION | | | EFFECT. DATE | | GRP | PHRASE | USOC | JRN | ACCT | TAR | MONTHLY RATE | "FROM" DATE | "THRU" DATE | FLD | OUT OF SERVICE NUMBER | | |
| TYP | ID | ID | NPA | NXX | LINE | C. C. | YR | MO | DAY | IND | CODE | OCC ID | IND | CODE | CODES | DOLLARS CENTS | YR MO DAY | YR MO DAY | IND | 219-229 | 231-233 | 235-238 |

1	35	22				113	92	61	21	1	905	208	R	7120	080900	1 75	91 04 21	91 04 22	M	396626354 7	668	6016
1	35	22								1	905	208	R	112		5 80			M			
1	35	22								1	905	208	R	EXD		3 50			M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			
1	35	22									905	208	R						M			

PREPARED DORIS FOWLER   CONTACT NO. 350·6241   DCE APR 15 1992

```
 1   MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS
 2             MANUAL HANDLING REQUIRED
 3   NPANYY: 467423      CS: BUS      CYCLE: 7272      CYCLE DATE: 01-27-92
```

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	CUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE
6 LMOS LINE ID NUMBER						LMOS TRACKING NUMBER		
7	439	927121	032716	910724	910730		35.00	㇄ ✓
8	T0301				39635395			
9	217	927121	032716	910717	910718		28.00	㇄ ✓
10					39635492		35.00	

```
1++B - 1.00 —          IFB - 28.00
9ZR - 6.00 /           ++B - 1.00
Htg  14.28             9ZR - 6.00
     28.00 /
IFB      DCF   FEB 05 1992               RCV'D JAN 29 1992
```

11 APPROVED: _____ Joette Kinsey _____ . Svc Repr ___(TITLE) 1-28-92 DATE

```
12   MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS
13             MANUAL HANDLING REQUIRED
14   NPANYY: 467425      CS: BUS      CYCLE: 7272      CYCLE DATE: 01-27-92
```

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE
17 LMOS LINE ID NUMBER						LMOS TRACKING NUMBER		
18	237	927121	032716	910413	910415		35.00	㇄ ✓
19					39635453			
20	429	920121	032716	910812	910813		35.00	㇄ ✓
21					39635465		2635	
22	455	927121	000901	910720	910722		26.70	F213 ✓
23					39605837			
24	279	920121	032716	910531	910603		35.00	㇄ ✓
25					39635476			
26	321	920121	032716	910408	910411		46.28	F217 ✓
27					39640536			

```
     DCF   FEB 05 1992                   RCV'D JAN 29 1992
APPROVED: _____ Joette Kinsey _____ . Svc Rep ___(TITLE)  1-23-92 DATE
```

1

ACCT: 407439   CS: EJS   CYCLE: 2272   CYCLE DATE: 01-27-92

VPA CD	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	RST DATE	MONTHLY RATE	TER CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER CC 6137 —
508 Delete   5080 WO

		920121	000901	910877	910595	22.15	F213
				39696142			
	329	920121	600901	910732	910724	22.15 20.05	2213
				39696152		88	
	155	920121	000901	910712	910712	25.00	F213
				39643663		34.00	
	431	920121	C32716	910711	910714	32.00	F213
				39635597			
	620	920121	154716	910727	910729	24.00	F213
				39635250		27.75	

RCV'D JAN 29 1992

APPROVED: _Joette Kinsey_ . _Svc Rep_ (TITLE) _1-28-92_ DATE

ACCT: 422729   CS: EJS   CYCLE: 2272   CYCLE DATE: 01-27-92

VPA CD	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	RST DATE	MONTHLY RATE	TER CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER   new cust 1/21
rate   Delete   DOI
611	920121	000702	910622	910627	10.20	F213
			39636152	Delete		
222	920121	036702	910486	910488	0 not conn until 1/22	F213
			39638170			
456	920121	036702	910727	910729	69.10	F213
			39635727		nt 2/5	

RCV'D JAN 29 1992

DCF   FEB 05 1992

APPROVED: _Nena Cox_ . _SVC REP_ (TITLE) _1/28/92_ DATE

2

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED   *RES*

NPANXX: 437452   CS: BUS   CYCLE: C272   CYCLE DATE: 01-27-92

NPA CC	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

| | 348 | 928121 | 000702 | 910817 | 910819 | 22.20 ✓ | 5213 |
| | | | | | 30626322 | | |

IFR 950 ✓
TVR 100 ✓   NSS 4.00 ✓
92M 350 ✓   MF03X (1.50CR)
ESL 220 —
ESX 350 —

RCV'D JAN 29 1992

9 APPROVED: _____ (TITLE) 1/28/92 DATE

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED

NPANXX: 437438   CS: BUS   CYCLE: 3272   CYCLE DATE: 01-27-92

NPA CC	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

| | 666 | 928121 | 000501 | 910985 | 910987 | 49.28 | 5213 |
| | | | | | 30635515 | | |

28.00   1FB
100   TTB
6.00   9ZR
14.28   Htg.

RCV'D JAN 29 1992

APPROVED: _____ (TITLE) 01-27-92 DATE

3

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED

VPANYX: 407294   CS: BUS   CYCLE: 0272   CYCLE DATE: 01-27-92

NPA CO	LINE NO	BUS ORD	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

| | 40 | 927121 | 000901 | 911239 | P11213 | 49.28 | ENGE |
| | | | | 39634879 | | | |

!FB   28.00
TTB   1.00
9ZR   6.00
       14.28
Htg.

RCV'D JAN 29 1992

APPROVED: _____ Src Reg (TITLE) 01-27-92 DATE

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED

VPANYX: 407639   CS: BUS   CYCLE: 0272   CYCLE DATE: 01-27-92

NPA CO	LINE NO	BUS ORD	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

| | 444 | 920121 | 000702 | 910723 | 910704 | 52.50 | ENGO |
| | | | | 39635662 | | | |

IFB - 25.75   9ZR 6.00
TTB - 1.00   Htg - 13.15
ESC - 3.75
ESM - 3.60
MFDX -   .75

RCV'D JAN 29 1992

APPROVED: M. Kail _____ . Servce Rep (TITLE) 01-02-92 DATE

4

MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS

MANUAL HANDLING REQUIRED

3 NPANXX: 384734   CS: BUS   CYCLE: 0272   CYCLE DATE: 01-27-92

4 NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	EER CODE

5 _____

6 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

7   359   027121 009,721   910586   910587 $38.20 ✓

8   39639470

DCF FEB 05 1992   RCV'D JAN 29 1992

9 APPROVED: _Jay F G_____ Svc Rep_ (TITLE) 1/27/92 DATE

NSS 4.00
IFR 10.30   EBM 2.45
TTR 1.00   9LM 3.50
SSL 2.20
9LM 3.50   38.25
1FR 10.30
TTR 1.00
APPROVED: _Sheila Collier_ Svc Rep (TITLE) 01/27/92 DATE

DCF FEB 05 1992   RCV'D JAN 29 1992

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED   RCV'D JAN 29 1992

NPANXX: 477943   CS: BUS   CYCLE: 9272   CYCLE DATE: 91-27-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAP CODES	OUT SV DATE	REST DATE	MONTHLY RATE	FED CODE
LMOS LINE ID NUMBER					LMOS TRACKING NUMBER			
	892	923121	132 716	911115	911115			
				39635958				
	449	923121	022 716	910627	910629			
				39635874				
	750	923121	032 716	910627	910629			
				39635962				
	325	923121	(Delete)	910627	912912			
				39635092				
	217	923121	032 7	911239	911237			
				39635995				

DCF   FEB 05 1992

APPROVED: _____   (TITLE) _____ DATE

MECHANIZED OUT OF SERVICE ADJUSTMENTS   — CRIS   mail

MANUAL HANDLING REQUIRED   RCV'D JAN 29 1992

NPANXX: 964258   CS: BUS   CYCLE: 9272   CYCLE DATE: 91-27-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAP CODES	OUT SV DATE	REST DATE	MONTHLY RATE	FED CODE
LMOS LINE ID NUMBER					LMOS TRACKING NUMBER			
	927	923121	008721	910625	910626		37 05	
				39635791			48.00	

CLT - 120 - M20 —
IFB - 23.85 G70 —
HTB - 1.00   E03 —
        FAO —
9ZR - 6.00
Htg. 1 2.20 — G70
         1.05 * G70
APPROVED   mileage 2.70 CX4   (TITLE) _____ DATE

6

MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS

MANUAL HANDLING REQUIRED

3 NPANXX: 904796   CS: BUS   CYCLE: 2272   CYCLE DATE: 01-27-92

4 NPA CO	LINE NO	CUS CDE	COMP DATE	TAP CODES	OUT SV DATE	REST DATE	MONTHLY RATE	PER CODE
5								

6 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

| 7 | 796 | 920121 | 0007U | 912922 910923 | | 33.50 | |
| 8 | | | | 79637046 | | | |

9 1FB   22.90
10 1TB   1.00
11 ESM   3.60
12 92R   6.00

adj
2/24/92

RCV'D FEB 12 1992
JM 1-27

MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS

RCV'D JAN 29 1992

14 MANUAL HANDLING REQUIRED

15 NPANXX: 407050   CS: BUS   CYCLE: 0272   CYCLE DATE: 01-27-92

16 NPA CO	LINE NO	CUS CDE	COMP DATE	TAP CODES	OUT SV DATE	REST DATE	MONTHLY RATE	PER CODE

17
18 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

19	519	920121	000,901	911128 911121	111.76	HYCC
				79637092		
20	576	920121	000,916	911227 911207	102.16	HYCC
21				79636092		
22	371	920121	000,901	912927 912929	639.24	HYCC
23				79636175		
24	735	920121	000,901	911923 911924	69.81	HYCC
25				79639488		
26	059	920121	000,901	911029 911010	1480	H212
27				79609695		
28						

DCF FEB 05 1992   [signature] Held L Collins Soc Rep (TITLE) 1/28/   DATE
29 APPROVED [signature]

JAN 29 10

7

1 APPROVED: _____, _____ (TITLE)

2 MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

3 MANUAL HANDLING REQUIRED

4 NPANXX: 904246   CS: BUS   CYCLE: 0275   CYCLE DATE: 01-30-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR COLE
7 LMOS LINE ID NUMBER					LMOS TRACKING NUMBER			
110								
109			920128 (2.75)	128,706	910112	910114	6.50 ✓	H212
648					40201858			
346			920128	111706	910302	910304	50.93	E001
					40201890			
154			920128 (2.75)	111,706	910304	910306	26.80 ✓	H213
					40201913 Dyw 5 G 869			1-24-92
345			920128	128706	910216	910217	50.78 ✓	EM00
					40208371			

adj 2/24/92   (2-10-92)   HM 1-30

16 APPROVED: _Mary F. Spiker_ Asst Mgr. (TITLE) _____ DATE

17 _____

18 (main TN

19 1FB   26.60
20 TTB   1.00
21 92R   6.00
22 HTG   13.58
23 ESC   3.75

1FB   26.60
ESM   3.60
TTB   1.00
92R   6.00
HTG   13.58

Drs   4.00
1FR   980
TTE   1.00
Crefl   250
ESX   350
MFD3X   1.50
NSS   4.00
9Ltn   350
      26.80

8

MECHANIZED OUT OF SERVICE ADJUSTMENTS — OIIS

MANUAL HANDLING REQUIRED

1 MANUAL HANDLING REQUIRED

2 NPANXX: 904384   CS: Red   CYCLE: 2572   CYCLE DATE: 01-27-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	EFF CODE
	226	920121	111,206	918719	917726	28.00	9217
				39617541			

LMCS LINE ID NUMBER   LMCS TRACKING NUMBER

FXY1H598 12-23-91

app 2/24/92

10 APPROVED: Mary F Spikes Assist Mgr TITLE: 2-10-92 DATE

11 MECHANIZED OUT OF SERVICE ADJUSTMENTS — OIIS

12 MANUAL HANDLING REQUIRED

13 NPANXX: 904384   CS: Red   CYCLE: 2572   CYCLE DATE: 01-27-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	EFF CODE
	784	920121	111,206	918413	917415	24.00	9217
				39617363			

16 LMCS LINE ID NUMBER   LMCS TRACKING NUMBER

389-6707

MBB R K   3.45-120   T7R 100 DJ3
GCC   1.00 DJ3   ESX 350 "
GCS   1.00 DJ3   4LM 350 EXO
           50 DJ3   24.00
mww   1005 110

app 2/24/92   RCV'D FEB 12 1992

1

2 NPANXX: 904262   CS: ~~BUS~~ Res   CYCLE: 6275   CYCLE DATE: 01-31-92

3/4 NPA CO LINE CUS COMP TAR   OUT SV REST MONTHLY ERR
         NO   CDE DATE CODES DATE DATE   RATE   CODE

5 LMOS LINE ID NUMBER ———————————— LMOS TRACKING NUMBER ————————

6 925   920121 *11,706* 913629 912721 *23.85* ✓ F213
7   39616553 *DYGNW50F 10-10-91*
8 *145* 920121 *11,706* 910715 912717 *14.55* ✓ E213
9   39616591
                                 DYX2F217
                                 10-28-91

                    adj 2/24/92

10 APPROVED: *Mary F Spikes. Assist Mgr* (TITLE) *2-10-92* DATE

11 MECHANIZED OUT OF SERVICE ADJUSTMENTS   — CRIS

12   MANUAL HANDLING REQUIRED

13 NPANXX: 904262   CS: BUS   CYCLE: 6275   CYCLE DATE: 01-30-92

14/15 NPA CO LINE CUS COMP TAR   OUT SV REST MONTKLY ERR
           NO   CDE DATE CODES DATE DATE   RATE   CODE

16/17 LMOS LINE ID NUMBER   (2x79)   LMOS TRACKING NUMBER

18/19 425 920128 *111706* 910289 910211 *22.35* ✓ K331
                          40202244
20/21 417 920128 *111706* 910289 910211 *48.38* F531
                          40202294

22
23 (main TN)   IFR - 1005
   1FB   27.40 ✓   T+   1.00
   TTB   1.00 ✓   ESC   330
   92R   6.00 ✓   ESY   350
   HTG - 13.98 ✓   NFD4X 300 ✓   *adj 2/24/92*
                            9CM - 350
                            NNS   4.00 ✓   *Hrx*
                                  -22.35 ✓

   APPROVED: *Mary F Spikes. Assist Mgr* (TITLE) *1-30* DATE
                    Res. only   *2-10-92*

10

MECHANIZED CUT OF SERVICE ADJUSTMENTS   - CRIS

MANUAL HANDLING REQUIRED

RCV'D FEB 12 1992

NPANXX: 904369   CS: RES   CYCLE: 2272   CYCLE DATE: 01-27-92

NPA CC	LINE NO	CUS CDE	COMP DATE	TAR CODES	CUT SV DATE	REST DATE	MONTHLY RATE	EFF CODE

LMCS LINE ID NUMBER   LMCS TRACKING NUMBER

| | 104 | 922121 | 114,206 | 912722 | 912729 | 18.05 | E213 |
| | | | | 39617753 | | | |

DYKCD798   1·16·92

ady 2/24/92

APPROVED: Mary F Sipler Asst Mgr   (TITLE) 2-10-92 DATE

RCV'D FEB 12 1982

MECHANIZED CUT OF SERVICE ADJUSTMENTS   - CRIS

MANUAL HANDLING REQUIRED

NPANXX: 904346   CS: RES   CYCLE: 2272   CYCLE DATE: 01-27-92

NPA CC	LINE NO	CUS CDE	COMP DATE	TAR CODES	CUT SV DATE	REST DATE	MONTHLY RATE	EFF CODE

LMCS LINE ID NUMBER   LMCS TRACKING NUMBER

| | 615 | 922121 | 116,206 | 912717 | 912718 | 19.80 | E213 |
| | | | | 39615979 | | | |

NPU   175
IFR   1005
THR   100
ESX   350
9LM   350

DYMB6232

10/3/91

ady 2/24/92

RCV'D FEB 12 1992

1   MANUAL HANDLING REQUIRED   RCVD FEB 12 1992

2 NPANXX: 904222   CS: BUS   CYCLE: 2272   CYCLE DATE: 01-27-92
                          Res

3 NPA CC LINE CUS   COMP   TAR   OUT SV   REST   MONTHLY   ERR
4   NO   CDE   DATE   CODES   DATE   DATE   RATE   CODE
----
5 LMOS LINE ID NUMBER   LMOS TRAC ING NUMBER   ✓
----
6   384 928121 009,703 910711 910717   22.35   B243
7   39814783 DYR77463 8-26-91
8   314 928121 000,703 911228 911227   21.50   PACC
9   39814391

980	175
70P	245
3xC	350
	50-
-350	980
175	100
	350
                                    ajy 2/24/92

10 APPROVED: Mary F Spiker Assist Mgr (TITLE) 2/10/92 DATE

                                    RCVD FEB 12 1992

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11 APPROVED: Mary F Spike Assist Mgr (TITLE) 2-10-92 DATE

12   MECHANIZED OUT OF SERVICE ADJUSTMENTS   - CRIS

13   MANUAL HANDLING REQUIRED

14 NPANXX: 904399   CS: BUS Res   CYCLE: 6275   CYCLE DATE: 01-38-92

15 NPA CO LINE CUS   COMP   TAR   OUT SV   REST   MONTHLY   ERR
16   NO   CDE   DATE   CODES   DATE   DATE   RATE   CODE
----
17 LMOS LINE ID NUMBER   LMOS TRAC ING NUMBER   ✓
18   118 928128 111,206 910119 910121   20.85   HM00
19   48283385

              Mary F Spiker Assist Mgr   ajy 2/24/92 2-10-92

                                    RCVD FEB 12 1992
      ml

12

1
2

MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

MANUAL HANDLING REQUIRED

RCV'D FEB 12 1982

3 NPANXX: 904477   CS: BUS   CYCLE: 0275   CYCLE DATE: 01-30-92

| 4 CO | LINE | CUS | COMP | TAR | OUT SV | REST | MONTHLY | ERR |
| 5 | NO | CDE | DATE | CODES | DATE | DATE | RATE | CODE |

6 S LINE ID NUMBER   LMOS TRACING NUMBER

| 7 | | 928 | 920128 | 117707 | 910216 | 910216 | 6299 | HM00 |
| 8 | | | | | 48209131 | | | |

COPXX

J Pat Prester   adj 2/21/92

9
10
11

12								
13								
14								

15*		1P	922121	117706	911284	911235	38.15	
14					79957153			
17		214	922121	117,706	911287	911238	1980	DYFG089 12-9-91
18 Rel					79616793			
19		451	922121	117,706	911737	911732	16.30	
20 Rel					79619422		CYX12730 12-20-91
21					1FK 10.05 110			

IFB	27.40	*1FB	27.40	NPU	1.75 — MZ0
TTB	1.00	TT	1.00 E03	TT	1.00 DJ3
CREXI	3.75	CREXI	3.75 E03	ESX	3.50 DJ3
92R	6.00	92R	6.00 FA0	9LM	3.50 EX0

adj 2-21-92

APPROVED: _____   (TITLE) HM 1-30 DATE

13

1 MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

2 ORL MAC JAN 28 1992   MANUAL HANDLING REQUIRED

3 NPANXX: 904430   CS: BUS   CYCLE: 8272   CYCLE DATE: 01-27-92

4 NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	PER CODE

5 ───

6 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER 12.60 2/12

7/8   749   027121 151,708 917526 917527   8.70
                                39619624

9   639   027121 000,708 918817 918819   21.90   28.90 2/12
10   39639591

                1FB - 21.90
11 1FR - 8.10   TTB - 1.00
12 TTR - 1.00   9ZR - 6.00
13 9LM - 3.50

14   RCVD FEB 03 1992

15 APPROVED: R Walk   (TITLE) SVC REP   DATE 1-30

16 MECHANIZED OUT OF SERVICE ADJUSTMENTS — CRIS

17 ORL MAC JAN 28 1992   MANUAL HANDLING REQUIRED

18 NPANXX: 497293   CS: BUS   CYCLE: 8272   CYCLE DATE: 01-27-92

19 NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	PER CODE

20 ───

21 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER 2/12

22   659   027121 000,901 911089 911211   62.81
23   39639315

                                          RCVD FEB 03 1992

APPROVED: R Walk   (TITLE) SVC REP   DATE 1-30

14

MECHANIZED CUT OF SERVICE ADJUSTMENTS - CRIS

MANUAL HANDLING REQUIRED

34

NPANXX: 407381   CS: FUS   CYCLE: 0275   CYCLE DATE: 01-30-92

NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE	ERR CODE

LMOS LINE ID NUMBER   LMOS TRACKING NUMBER   2/13

| | 633 | | 920128 | 000,901 | 910302 | 910303 | ~~57.38~~ | HMOO |
| | | | | | 40208177 | | 56.88 | |

RCV'D FEB 03 1992

APPROVED: *Carol Simcock*, *Svc rep* (TITLE) 1/31/92 DATE

	10		920121	032716	911007	911007	23.55 /	5213	2
					39652207		~~54.53~~ / 2/13		
	146		920121	000901	912031	910032	~~35.00~~		
					39634944		1830	2/13	
	232		920121	192716	910711	910712			
					39632279		21.80	2/13	'01
	172		920121	000901	911005	911707			
					39632318		2510	2/14	
	859		920121	032716	911031	911033			
					39632334				

RCV'D FEB 03 1992

APPROVED: *Sylvia Watley*, Svc Rep (TITLE) 01-30-92 DATE

15

130	920121	000718	910803	910805	45.80
			39639145		17.15
426	920121	000.718	911011	911012	
			39632957	DY78C 020	12-
539	920121	119718	910628	910628	49.23
			39639161		29.90
300	920121	000718	910719	910720	
			39639179		31.15
427	920121	119718	910519	910620	
			39639187		

RCV'D FEB 0

12 APPROVED: _____ , _____ (TITLE) _____

13   MECHANIZED OUT OF SERVICE ADJUSTMENTS   – CRIS

14   MANUAL HANDLING REQUIRED

15 NPANXX: 904457   CS: BUS   CYCLE: 0271   CYCLE DATE: 01-2

16 NPA CO	LINE NO	CUS CDE	COMP DATE	TAR CODES	OUT SV DATE	REST DATE	MONTHLY RATE
17

18 LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

19

20 1FB	22.90–	1FB 22.90	1FB 22.90	1FB 22.90
21 FTB	1.00–	TTB 1.00	TTB 1.00	TTB 1.00
22 ESM	3.60–	HTG 11.73	92R 6.00	ESC 3.75
23 92R	6.00–	92R 600		9LM 3.50
24 1SE6X	12.30	TT532 7.60		
	G12	D63		

on20 · 1.75
pol. 110 – 8.40
ttR – 1.00
uuf – 2.50
9LM · 3.50

RCV'D FEB

APPROVED: _____ , _____ (TITLE) _____

16
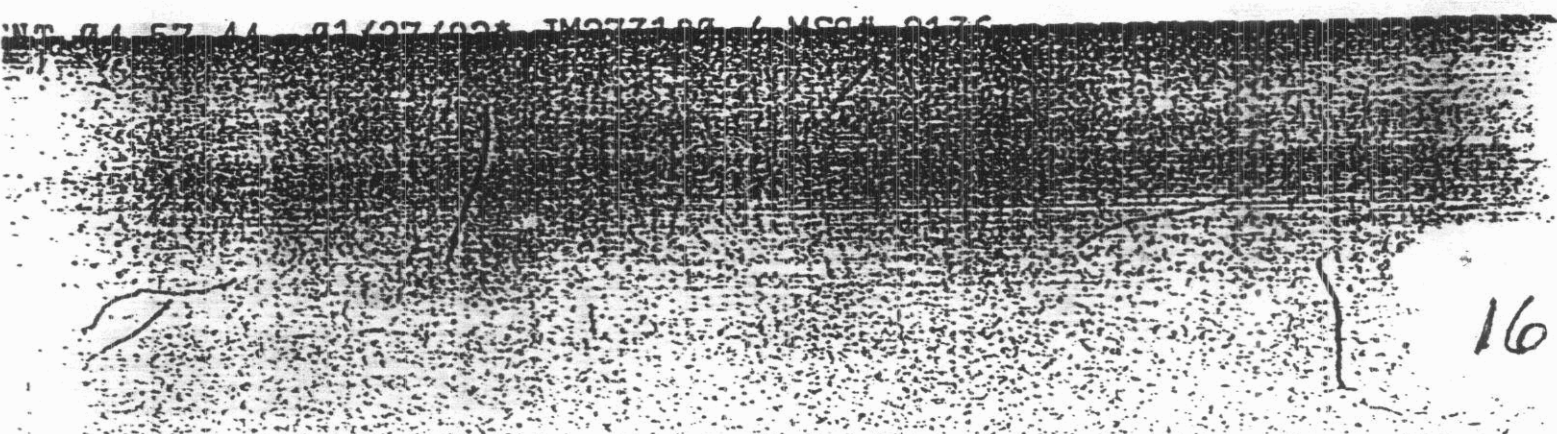
LMOS LINE ID NUMBER   LMOS TRACKING NUMBER

2   953   920128   105722 910389   910311   40,13
3   40208826

    IFB   21.90—
    TTB   1.00
    92R   6.00   RCVD FEB 0
    HTG   11.23—
                                                       Hm 1-31

APPROVED:_____,_____ (TITLE) _____

17

	NO	CDE	DATE	CODES	DATE	DATE	RATE
1							

	NO	CDE	DATE	CODES	DATE	DATE	RATE
3	924 072 0751	919	92012B	116726	910105	910107	~~37.00~~
4	924 972-0751				40208999		39.50

```
IFB      23.85
IIB       1.00
92R       6.00
ESM       3.60
ESY       5.80
MFD2Y      .75 cr
```

RCV'D FEB 0

Hm 1-3

APPROVED: _____ , _____ (TITLE) _____

NT 07.08.18   01/30/92* JM0770E0 / MSG# 5424
SSAGE ORIGINALLY QUEUED TO LU JN0770E0

18

3

In December 1945, the South Continental Areas... ...rands were the first areas to convert... ...the use of the Revenue system... to apply... ...which made it necessary to establish a separate account for... ...ing and administering taxes. Prior to this time, taxes...

-4-

ADJUSTMENTS TO CUSTOMERS' BILLS

DESCRIPTION OF FORMER ERRORS DETECTED ON MANUAL 5040.X THE

Type of Error   North East Southeast Lo