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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Comprehensive Review of )  
Customer Rebates on Trouble ) Docket No. 910163-TL  
Reports of Southern ) 910727-TL  
Bell Telephone & Telegraph )  
Company )  
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Fort Lauderdale, Florida  
October 15, 1992  
2:30 o'clock P.M.

DEPOSITION

OF

KATHLEEN GARGIULO

COPY

*Edited version of  
13700-92*  
DOCUMENT AUTHORITY DATE

13707 10/20/92

TPSC-RECORDS/REPORTING

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WITNESS:

DIRECT

KATHLEEN GARGIULO

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APPEARANCES:

OFFICE OF PUBLIC COUNSEL,  
by SUSAN RICHARDSON, ESQ., of counsel,  
appearing on behalf of the Citizens of the  
State of Florida.

ROBERT BEATTY, ESQ.,  
appearing on behalf of BellSouth  
Telecommunications, Inc.

JEAN WILSON, ESQ.,  
appearing on behalf of Employment Service  
Commission Staff.

ALSO PRESENT:

STAN GREER, Division of Communications.  
CARL VINSON, Division of Research and  
Regulatory Review.

- - - - -

Deposition of KATHLEEN GARGIULO, a witness  
of lawful age, taken by the Citizens of the State of  
Florida, for the purpose of discovery and for use as

1 evidence in the above-entitled cause, In re:  
 2 Comprehensive Review of Customer Rebates on Trouble  
 3 Reports of Southern Bell Telephone & Telegraph Company,  
 4 pending before the Florida Public Service Commission,  
 5 pursuant to notice heretofore filed, before KATHLEEN  
 6 SCHWAB, a Notary Public in and for the State of Florida  
 7 at Large, at Southern Bell Telephone & Telegraph  
 8 Company, Room 1015A, 6451 North Federal Highway, Fort  
 9 Lauderdale, Broward County, Florida, on the 15th day of  
 10 October, 1992, commencing at 2:30 o'clock P.M.

11 - - - - -

12 Thereupon:

13 KATHLEEN GARGIULO

14 was called as a witness on behalf of the Citizens of  
 15 the State of Florida, and being first duly sworn, was  
 16 examined and testified as follows:

17 MR. BEATTY: My name is Robert Beatty.

18 And, of course, I represent BellSouth  
 19 Telecommunications, doing business as Southern  
 20 Bell. Let me take a few moments to put a number  
 21 of matters on record.

22 First, that the deposition - this  
 23 deposition's taken pursuant to proper notice as  
 24 to date, time and location.

25 Number two, that the parties stipulate -

1 and this is mostly legal kind of issues.  
2 Parties stipulate and agree that we will reserve  
3 all evidentiary objections except as to form.

4 Third, that we do not waive reading or  
5 signing of the deposition, in the event that  
6 it's transcribed.

7 And fourth - I direct this to you, Ma'am -  
8 that the Southern Bell Legal Department  
9 conducted a legal investigation, which you may  
10 or may not be aware of, and that investigation  
11 pertained to the issues about which we're going  
12 to discuss with you today. That investigation  
13 was conducted pursuant to the attorney/client  
14 privilege and the attorney work product  
15 privilege and, therefore, everything pertaining  
16 to that investigation's confidential and  
17 privileged.

18 I request, therefore, that you not  
19 disclose anything in this deposition regarding  
20 that investigation, if you know anything at all.  
21 If asked a question regarding something that  
22 will cause you to talk about the investigation,  
23 I request first, before you talk about it, that  
24 you let us know that the question and the answer  
25 does relate to the investigation and that you

16  
1 give me then an opportunity to make the  
2 appropriate objection and then ultimately do not  
3 disclose any information regarding that  
4 investigation. Okay?

5 THE WITNESS: Mm-hm.

6 DIRECT EXAMINATION

7 Q (By Ms. Richardson) Okay. And then with  
8 that said, what I'd like to know, have you seen any  
9 documents from the internal investigation Mr. Beatty  
10 referred to?

11 A No.

12 Q Have you heard any information related to  
13 the internal investigation Mr. Beatty referred to?

14 A I may have. I don't know for sure.

15 Q Have you heard any information other than  
16 rumors or scuttlebutt or what you've read in the paper  
17 related to this investigation?

18 A I may have heard other information as part  
19 of my job.

20 Q Okay. Related to?

21 A Right.

22 Q Would you please state your name and spell  
23 it, for the court reporter?

24 A First name is Kathleen, K-A-T-H-L-E-E-N,  
25 last name Gargiulo, G-A-R-G-I-U-L-O.

1 Q And your address, please?

2 A

3

4 Q And your phone number, please?

5 A Home number? Area code .

6 Q Thank you. And what is your present title  
7 with the company?

8 A I'm a manager of the Quality Assurance  
9 Center in Fort Lauderdale.

10 Q Are you with the regional accounting  
11 office or revenue accounting?

12 A No, I'm in the Customer Services  
13 Department. I'm in customer services.

14 Q Okay. Is one of your titles Area  
15 Coordinator?

16 A Previously I was on the customer services  
17 staff and I was the MOOSA area coordinator.

18 Q From when to when? What time period did  
19 that cover?

20 A From probably June of '91 till when I just  
21 got my new job, October, 1st of October, two weeks ago.

22 Q And is this present position a promotion  
23 for you?

24 A Yes.

25 Q And what duties are involved in your



1 present position?

2 A The Quality Assurance Center is created  
3 for the customer services organization and it's a  
4 state - it's here in Fort Lauderdale and it handles all  
5 state matters. It would handle billing  
6 reconciliations. They also handle the centralization  
7 of all MOOSA and manual handling reports, can't get  
8 away from it. They also handle other matters that may  
9 come up in regards to different situations.

10 Right now, we are handling any customers  
11 who may be questioning services that they have on their  
12 accounts that they don't believe they ordered. And  
13 that should about cover it.

14 Q Okay. And what were your duties as a  
15 MOOSA area coordinator?

16 A I was on the customer center's - I was  
17 assistant staff manager and I had a number of different  
18 duties, supporting the general manager of the state,  
19 one of those being MOOSA area coordinator for customer  
20 services that was mainly to be an interface with our  
21 subject matter expert in Atlanta on any policies or  
22 procedures as they affected Florida.

23 Q MOOSA, that stands for?

24 A Mechanized out-of-service adjustments.

25 Q And just for my clarification, interface

1 with subject matter expert -- I'm sorry. I guess I'm  
2 tired. That doesn't say anything to me. Could you be  
3 a little more specific or explain a little bit more?

4 A There are subject matter experts on  
5 various subjects that are handled within the customer  
6 services or is based in our headquarters locations in  
7 Atlanta or Birmingham. They are the people who create  
8 the policies and/or procedures and if we have any  
9 problems with specific subjects, we go to these  
10 specific individuals.

11 In my case, I do not write any practices  
12 or procedures for any subject, but from a state  
13 standpoint, if that person has a problem or question or  
14 anything, it comes through me rather than going  
15 throughout our business offices in the State.

16 Q So, is that an advisory function then,  
17 someone questioned whether or not it's a practice to do  
18 X and they call you and say yes or no, it is?

19 A It could be that or normally those  
20 questions would go to the subject matter expert, but  
21 the subject matter expert would come to me for anything  
22 that may affect the state in the practices or  
23 procedures for coordination, or if I find a problem  
24 that is statewide, then I would take that problem,  
25 rather than have the individual offices be going to the

1 subject matter expert, and I would take it to the  
2 subject matter expert to coordinate it.

3 Q Could you give me an example of a  
4 statewide problem that you've done that for?

5 A On MOOSA?

6 Q MOOSA would be great.

7 A We had a question with - there's a cycle  
8 date that's printed on the report and the cycle date  
9 was not printing on our reports, and I referred that to  
10 the subject matter expert to find out what the problem  
11 was, just indicates when it comes to us.

12 Q When what comes to you?

13 A I'm sorry. The manual handling report  
14 from MOOSA.

15 Q And why was it not printing?

16 A There was a program glitch and it was  
17 cleared the following day.

18 Q Did the absence of a cycle date at all  
19 affect whether or not a rebate was given to a  
20 particular customer?

21 A No.

22 Q Did it affect - the absence of a cycle  
23 date at all affect the timing of the rebate for a  
24 customer?

25 A No.

1 Q Did the absence of a cycle date at all  
2 affect whether or not that report was maybe lost in the  
3 system for awhile?

4 MR. BEATTY: Object at this point. This  
5 is substantially beyond the scope of what we're  
6 here about. You've had latitude. You asked a  
7 number of questions. I think the questions you  
8 asked have been sufficient to very clearly  
9 indicate to you this is outside the perview of  
10 what we're here for today. I would object on  
11 the grounds of relevance.

12 MS. RICHARDSON: To my understanding and  
13 for the record, 910163 has been combined with  
14 910727, which is the rebate docket by -  
15 primarily concerned with rebating customers for  
16 trouble reports.

17 Q Let me ask you, is MOOSA part of the  
18 process for rebating customers for out-of-service  
19 reports that have gone out-of-service over 24 hours?

20 A Yes.

21 MR. BEATTY: What we're talking about is  
22 the cycle date problem. You were asking a  
23 series of questions on the cycle date problem.  
24 What I'm indicating is that has nothing to do,  
25 as the witness has indicated, with the subject

1 matter of your concerns. Moreover, it has  
2 nothing to do with the subject matter of this  
3 docket. Therefore, I'm requesting that you move  
4 on.

5 Q Can you tell me, Ms. Gargiulo, whether or  
6 not - or what kind of problem was posed with the cycle  
7 date in relation to MOOSA reports?

8 MR. BEATTY: Objection. It's been asked  
9 and answered already and I think she's given the  
10 information to you actually twice.

11 Q Did it affect at all customer rebates in  
12 any way, shape or form?

13 MR. BEATTY: Objection. It's been asked  
14 and answered. That was the series of questions  
15 that preceded my objection to which she had  
16 already given an answer.

17 Q You can answer that question. He's got  
18 his objection on the record.

19 A Repeat it again for me, please.

20 Q Was the absence of the cycle date in any  
21 way, shape or form -- I was giving you specific  
22 instances and specific questions. Other than that,  
23 what effect did it have at all on customer rebates?

24 A None.

25 Q Okay. When did you start with Southern

1 Bell? How long have you been with the company?

2 A With Southern Bell? I transferred from  
3 New Jersey Bell to Southern Bell in August of 1976.

4 Q How long - how many years have you spent  
5 in the customer billing and record area?

6 A In the customer services organization,  
7 I've spent my entire career in some part of customer  
8 services.

9 Q Okay. Can you explain to me the billing  
10 reconciliation process that you mentioned earlier?

11 MR. BEATTY: Object on the grounds of  
12 relevance.

13 Q That you had something to do with billing  
14 reconciliation as quality - in the Quality Assurance  
15 Center?

16 A In the Quality Assurance Center, my job  
17 now, yes. We have records that -- For instance, we  
18 have what's called a listing conversion and we have  
19 some records that need to be cleaned up. We have two  
20 records and it should be just one record and it was a  
21 result of the change.

22 Q Okay. And again, I'm having a little  
23 trouble following records and records and records. Can  
24 you be a little bit more specific so that I can  
25 understand exactly what you mean?

1 MR. BEATTY: What is the question?

2 MS. RICHARDSON: When you say records,  
3 comparing records and other records --

4 Can you read her response back for me? I  
5 lost it.

6 (Thereupon, the requested portion of the  
7 record was read by the reporter as above recorded.)

8 A Records are what we call a customer  
9 service record and it's a list of - it's a list of the  
10 customer and his billing information. And we have two  
11 records on the same customer, because at one time, for  
12 listings and different directories, it was required to  
13 have two. We've had a procedural change, which  
14 combined those records, so we're combining those  
15 records into one record. We had what was called a  
16 billing record at one time and a publishing record and  
17 now we're combining them into one record.

18 Q That's a lot clearer. Thank you.

19 Can you explain the credit process for  
20 out-of-service trouble reports? Are you familiar with  
21 that?

22 A The only part that I'm familiar with is  
23 how it relates to us, what we do in customer services.  
24 I can give you a broad overview of what I understand  
25 what happens, but for the specifics until it gets to

1 customer services, no.

2 A customer is entitled to a credit -  
3 out-of-service credit for over 24 hours and a MOOSA  
4 flows through the system to give that customer credit;  
5 however, based on some criteria in place now, for  
6 instance, if it is a multi-line customer, if the  
7 account is disconnected or if the trouble report - if  
8 what was reported doesn't match up - the numbers and  
9 customer account codes and customer codes don't match  
10 up, then it drops in the customer services organization  
11 and a manual handling report is created.

12 And that part then is what we now, in  
13 quality assurance or in customer services organization,  
14 handle. That is one that does not flow through the  
15 system and needs manual handling to apply the credit to  
16 the customer's bill.

17 Q Okay. Can you explain how that manual  
18 handling process is done?

19 A Mm-hm, yes. When we receive the report  
20 from the Quality Assurance Center 'cause that's where  
21 it is now, then we take all the reports off and look up  
22 each customer account and rectify it, list the monthly  
23 service for the customer, list the appropriate USOCS,  
24 which you're familiar with?

25 Q Universal service order codes, USOC?



1           A           That's right. We list the appropriate  
2           USOCS, we list the taxing area code and total monthly  
3           rate. We then take that record, it's signed and sent  
4           to our comptroller's department for manual input to  
5           give the customer the out-of-service credit.

6           Q           Manual input into what, do you know?

7           A           I'm not familiar with the comptroller's  
8           piece, what they do from there. We pass it on from  
9           there and they put it into the billing system. I don't  
10          know.

11          Q           Is that a new procedure for MOOSA, do you  
12          know?

13          A           No.

14          Q           This is the way it's been done for as long  
15          as you're aware of?

16          A           Yes. We have had procedural changes in  
17          March of '91, one certain procedural change, but that's  
18          the basic procedure, yes, that was in place previous to  
19          September of '91 and is in place now.

20          Q           Okay. In terms of -- Let me start off  
21          with this, Ms. Gargiulo. I'm going to give you a copy  
22          of staff's third interrogatory item number 15,  
23          information provided by Kathy Gargiulo, listed here,  
24          and ask you if this is an interrogatory that you did  
25          respond to?

1 A Yes.

2 Q Okay. And the information is true and  
3 accurate, to the best of your knowledge?

4 A Mm-hm.

5 Q Okay. And your response indicates --  
6 Well, the question was: Please identify the MOOSA area  
7 staff coordinators for Florida, as described on Page  
8 3.41.3 of the BellSouth CRIS User Guide, and the  
9 response was Kathy Gargiulo. That's you?

10 A Yes.

11 Q Then I would like to show you what may or  
12 may not be - I'd like for you to identify it for me -  
13 BellSouth CRIS User Guide and have you tell me if this  
14 is the one that was indicated in staff's third  
15 interrogatory.

16 MR. BEATTY: If you know.

17 A I don't. I'm not -- I don't know about  
18 the user guide, itself. I have to look through this  
19 user guide to find out.

20 Q You can take your time and look. I think  
21 the interrogatory mentions 3.41.3.

22 MR. BEATTY: Are you asking her whether  
23 she attached this document?

24 MS. RICHARDSON: I'm asking if this  
25 document is what she responded when they asked -

1 if her response relates to this response in the  
2 document, if that's her understanding.

3 A I'm the MOOSA area staff coordinator for  
4 customer services. Yes, I gave that response.

5 Q Is that the response - only response that  
6 you gave?

7 A Yes.

8 Q Okay. The question refers to 3.41.3 of  
9 the BellSouth CRIS User Guide, if that's what you were  
10 referring to when you responded to that question.

11 MR. BEATTY: I think what the witness is  
12 saying is that paragraph B -- Allow me to go off  
13 the record for a second.

14 (Discussion off the record.)

15 MR. BEATTY: Back on the record.

16 MS. RICHARDSON: Let me show this to the  
17 Staff, also.

18 MR. BEATTY: The paragraph B on the  
19 document that you have given to the witness --

20 MS. RICHARDSON: Interrogatory response?

21 MR. BEATTY: Yes. Is not her document.

22 That's not her response, as I understand it.

23 She is the area coordinator, as reflected in

24 paragraph A. Paragraph B is not her response.

25 MS. WILSON: Who would have --

1 Q Who gave the answer to B?

2 A I don't know. I am the area staff MOOSA  
3 coordinator. I mean, that is my title, as one of the  
4 responsibilities, but I don't know.

5 Q Okay. At the bottom of this interrogatory  
6 response, there is a place marked information provided  
7 by. Who is listed as having provided the information?

8 A My name.

9 Q That's your name. Did you provide the  
10 information for responses A and B?

11 A I provided the response for the MOOSA area  
12 staff coordinator, but I can't remember. I would  
13 assume that this was here, so I'm going to have to say  
14 that I provided the name as MOOSA area staff  
15 coordinator. Yes, I provided my name. Please refer to  
16 BellSouth CRIS User Guide. That's what's up here.

17 Q Okay. I guess I need to follow-up a  
18 little bit more then, at the risk of beating a dead  
19 horse here. You provided the information. Who  
20 provided B, if you do know, the information for B?

21 A I don't know.

22 Q Was B present on the form when you signed  
23 off for it? Was the answer to B present when you  
24 signed off as the information provider?

25 A I don't remember it because I don't

1 remember that phrase.

2 MR. BEATTY: Excuse me. Do you have the  
3 entire document?

4 MS. RICHARDSON: No, I don't.

5 MR. BEATTY: It has no signatory page or  
6 anything. I think if we had the entire  
7 document, it might be a bit clearer, both to her  
8 and certainly to me as to what this is and what  
9 has been attributed to her in terms of  
10 information, as reflected in this document.

11 MS. WILSON: I think we would want to know  
12 who responded to that interrogatory. It looks  
13 as though she's responding to it.

14 Q Then let me try one more time on this  
15 second document that is entitled Volume III, Part 3,  
16 Section 41, BellSouth CRIS User Guide, Billing Concepts  
17 and Services, BOC Billing Concepts and Services, MOOSA.  
18 And I am referring to Page 3.41.5, Section 3.05 within  
19 the CRIS User Guide. And within this paragraph, it  
20 mentions MOOSA area staff coordinator. If you would  
21 read 3.05 and see if that's in the scope of your duties  
22 as you understand them.

23 MR. BEATTY: I think what the issue is --  
24 We need to go off the record

25 (Discussion off the record.)

1 MS. RICHARDSON: Back on the record.

2 Q Looking at this Section 3.05 that I've  
3 just mentioned - and it says something about MOOSA  
4 staff area coordinators - are you familiar with this?

5 A This piece right here, which is your  
6 highlight piece?

7 Q Go ahead and read it aloud into the  
8 record.

9 A Form MP 2877 MOOSA CRIS Reconciliation  
10 Report to be used by the MOOSA area staff coordinator  
11 and are also transmitted to the BOCRIS printer in the  
12 service center to be followed up.

13 Q And that is part of your functions and  
14 duties?

15 A Yes. It was my function and duty, right,  
16 as MOOSA area staff coordinator, that I did get a copy  
17 of the Reconciliation Report.

18 Q And are you familiar, in general, with the  
19 CRIS - BellSouth CRIS User Guide, these practices and  
20 procedures?

21 A No, because it's not from my department.  
22 Okay. That's the Comptroller's Department. I have my  
23 own procedures for customer services.

24 Q Okay.

25 A I know that I am in charge of the

1 Reconciliation Report, but that's all.

2 Q What is a Reconciliation Report?

3 A It's a report that's generated 14 business  
4 days - I hope that I remember this right. Without  
5 looking at my procedures, I can't tell you for sure.  
6 After 14 business days after the MOOSA is sent to  
7 verify the manual handling, MOOSA is received to verify  
8 that that manual handling report has been worked to the  
9 customer's bill. The reconciliation bill is generated  
10 because there is no indication that it has been worked.  
11 Reconciliation Report is sent to us to say basically,  
12 what's going on, you haven't done this yet.

13 Q Okay. And in that process then, you  
14 receive that report and what do you do?

15 A Well, there are two reports received. One  
16 goes to the Quality Assurance Center and then I receive  
17 the report monthly. As an area staff coordinator, I  
18 would review these reports to insure that we did not  
19 have delayed manual handling reports that have not been  
20 handled.

21 Q And how would you go about insuring that?"

22 A Going through the report and, if  
23 necessary, following up to find the status of those -  
24 each of those.

25 Q In backtracking and following up, what

1 other documents or systems do you look at to  
2 doublecheck or backtrack or audit?

3 A We consolidated the MOOSA into the Quality  
4 Assurance Center on the eighth floor, so once we did  
5 that, then I would go to the Quality Assurance Center  
6 and we had people designated, who handled the manual  
7 reports and have them check anything that was on the  
8 reconciliation report. I would check their  
9 reconciliation report first because they get the same  
10 report and make sure it was cleared and I can look at  
11 the BOCRIS records to determine that.

12 Q Is that Business Office?

13 A Customer records.

14 Q Information systems, something like that?

15 A I believe so.

16 Q Is that data in the computer or is that  
17 hard paper form data?

18 A In the computer. The Reconciliation  
19 Report is also in printout form in the Quality  
20 Assurance Center.

21 Q Okay. Still referring to the BellSouth  
22 CRIS User Guide that we've been talking about, I'd like  
23 to show you Exhibit C from that document and have you  
24 tell me if you recognize that example document and what  
25 it is.



1           A       This is a CRIS Reconciliation Report.

2           Q       Is there -- Let me show it to Staff for a  
3 minute so they can have an idea of what we're looking  
4 at.

5                   MR. BEATTY: No problem.

6           Q       Now, you've identified this as a  
7 Reconciliation Report and for the purposes of my  
8 understanding, would you please read the different  
9 column headings and tell me what each one of them is  
10 for, then when you read this report, what that means to  
11 you?

12           A       The first column, which is MPA, is the  
13 area code. Second column, CO, is the central office.  
14 The next column, line number, is the line number that  
15 goes with the NNX, and the MPA, CO and line number  
16 together equal customer's telephone number. Next line  
17 is customer code, which is a unique three-digit code  
18 associated with the customer telephone number.

19           Q       You mean the individual customer telephone  
20 number, so there's a different one of those for every  
21 telephone number?

22           A       Each telephone account.

23                   Next column is completion date of the  
24 out-of-service. Next column is TAR code, which is  
25 taxing area revenue. It's accompanied - that's

1 assigned for each specific area, each customer address  
2 area. Next column, out-of-service date, is the date  
3 the customer went out-of-service. Next column is the  
4 date that the customer was restored.

5 Q Their telephone line went out-of-service  
6 and then it was restored?

7 A Exactly.

8 Q Would those dates refer back to the actual  
9 customer record as it initially came into the  
10 reporting - the IMC service department, does it go back  
11 to that point?

12 A That is my understanding.

13 Next column is monthly rate column, which  
14 would be filled in along with the tax area code. Next  
15 column is LMOS line ID number, which refers to the  
16 actual number that was out-of-service, which may be  
17 different from the main account number, maybe a second  
18 line. Then the LMOS tracking number is a specific  
19 number that's assigned to each MOOSA that flows through  
20 the system.

21 Q Okay.

22 A And it's how it's tracked in all the  
23 different departments.

24 Q The monthly - did you say revenue amount?

25 A Monthly rate.

1 Q Monthly rate, what is that?

2 A The total local service amount that the  
3 customer pays.

4 Q On a monthly basis?

5 A Mm-hm, billed to the customer monthly.

6 Q That's for all the lines that customer  
7 has?

8 A Yes. Well, no. It's blank. So, based on  
9 what is out-of-service, then you have to fill in the  
10 appropriate monthly rate.

11 Q Is that determined by the various USOCs  
12 that that customer has?

13 A Yes.

14 Q Are all USOCs rebatable?

15 A No.

16 Q Do those columns on that reconciliation  
17 form correspond to the 9156 forms for manual processing  
18 of customer rebates?

19 A I'm not familiar. The '91 figures is not  
20 a familiar process with me, with MOOSA, so I can't tell  
21 you.

22 Q Okay. I'd like to show you some sample  
23 Reconciliation Reports and --

24 Off the record.

25 (Discussion off the record.)

1 MS. RICHARDSON: Back on the record.  
2 We're going to place into evidence the first  
3 exhibit shown Ms. Gargiulo, which was identified  
4 as staff's third interrogatory, item number 15,  
5 and that is Exhibit One.

6 Exhibit Two was identified to Ms. Gargiulo  
7 as BellSouth CRIS, C-R-I-S, User Guide, Volume  
8 III, Part 3, Section 41, Billing Concepts and  
9 Services, MOOSA. And exhibit -- Those are the  
10 two exhibits to date on this record.

11 We have agreed - Counsel has agreed to  
12 suspend this deposition until a later date to be  
13 determined sometime the first week of November  
14 when Southern Bell has agreed to bring Ms.  
15 Gargiulo and any other witnesses they feel  
16 necessary to address the other exhibits that  
17 will be given at that time. Is that close  
18 enough?

19 MR. BEATTY: We will bring these witnesses  
20 to Tallahassee for the purpose of continuation  
21 of this deposition and any additional  
22 depositions necessary to testify regarding the  
23 documents to which you will give me copies  
24 today. And we have tentatively set November 5th  
25 or at least the week of November 5th and all the

1 parties will get together to coordinate after  
2 today. That's it.

3 (Whereupon, the deposition was adjourned at 3:45 P.M.)

4 - - - - -

6 CERTIFICATE

7 STATE OF FLORIDA )  
8 : SS.  
9 COUNTY OF BROWARD )

9 I, KATHLEEN SCHWAB, a Notary Public duly  
10 commissioned and qualified in and for the State of  
11 Florida at Large, do hereby certify that pursuant to  
12 notice heretofore filed, there came before me on the  
13 15th day of October, 1992, at Southern Bell Telephone &  
14 Telegraph Company, Room 1015A, 6451 N. Federal Highway,  
15 Fort Lauderdale, Broward County, Florida, the following  
16 named person, to wit: KATHLEEN GARGIULO, who was by me  
17 duly sworn to testify to the truth and nothing but the  
18 truth of her knowledge touching and concerning the  
19 matters in controversy in this cause; that she was  
20 thereupon examined upon her oath and her examination  
21 reduced to writing under my supervision, and that the  
22 deposition is a true record of the testimony given by  
23 the witness.

24  
25 I further certify that I am neither

1 attorney nor counsel for, nor related to nor employed  
 2 by, any of the parties to the action in which this  
 3 deposition is taken, and further that I am not a  
 4 relative or employee of any attorney or counsel  
 5 employed by the parties hereto, or financially  
 6 interested in the action.

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IN WITNESS WHEREOF I have hereunto set my  
 hand and affixed my official seal this 2nd day of  
 November, 1992.

*Kathleen Schwab*  
 -----  
 Notary Public, State of Florida at Large  
 My Commission expires: December 6, 1992.