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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

:
In the Matter of
:
Investigation into the
integrity of SOUTHERN BELL
TELEPHONE AND TELEGRAPH
COMPANY'S repair service
activities and reports.

DOCKET NO. 910163-TL

920260 - TL

DEPOSITION OF: LAURA D. FARMER

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

PLACE: 666 N.W. 79th Avenue
Room 640
Miami, Florida

TIME: Commenced at 9:45 a.m.
Concluded at 10:25 a.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: Pamela A. Canell
Official Commission Reporter

(xuf 5998-93)

DOCUMENT NUMBER-DATE

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FLORIDA PUBLIC SERVICE COMMISSION

1

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21 *new Page*

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I N D E X

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25

Page No.

ERRATA SHEET	5
STIPULATION	6
AFFIDAVIT OF DEPONENT	40
CERTIFICATE OF OATH	41
CERTIFICATE OF REPORTER	42

WITNESS

LAURA D. FARMER

Examination by Ms. Richardon	7
Examination by Ms. Wilson	37
Examination by Mr. Vinson	39

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S T I P U L A T I O N

IT IS STIPULATED that this deposition was taken pursuant to notice in accordance with the applicable Florida Rules of Civil Procedure; that objections, except as to the form of the question, are reserved until hearing in this cause; and that reading and signing was not waived.

IT IS ALSO STIPULATED that any off-the-record conversations are with the consent of the deponent.

1 LAURA D. FARMER

2 appeared as a witness and, after being first duly sworn
3 by the court reporter, testified as follows:

4 EXAMINATION

5 BY MS. RICHARDSON:

6 Q Okay. Ms. Farmer, would you please state
7 your name for the court report and spell it to make
8 sure that we have it correctly?

9 A Laura, L-A-U-R-A, Farmer, F-A-R-M-E-R.

10 Q And your address?

11 A It's -- I just moved. Wait.

12
13 Q And that's Miami?

14 A Uh-huh.

15 Q And the zip code?

16 A

17 Q And your phone number?

18 A

19 Q And that's area code 305?

20 A

21 Q And what is your present position with the
22 Company?

23 A Maintenance administrator.

24 Q And where is that?

25 A That's at 8610 Southwest, 107th Avenue.

1 Q Which IMC is that in?

2 A That's South Dade.

3 Q South Dade IMC. And how long have you been a
4 maintenance administrator in South Dade?

5 A Since '83.

6 Q And who is your present supervisor?

7 A Dottie Ketchum.

8 Q Is she a first level, second level?

9 A First level.

10 Q And how long has she been your supervisor?

11 A About maybe three years. Three years, I
12 guess.

13 Q About 1990?

14 A Yeah, something like that.

15 Q Who was the first level supervisor before
16 that?

17 A I had so many, I don't know. Let's see. I
18 really don't remember. I'm trying to think. I think
19 Renee Munoz was a supervisor at one time, but I'm not
20 sure she was after her or before her.

21 Q All right. And that's M-U-N-O-Z?

22 A M-U-N-O-Z.

23 Q Munoz, okay. And that was sometime before
24 Ms. Ketchum, but your not real sure when?

25 A Yeah. Who else you mean?

1 Q Yes.

2 A When I first came in there, it was Brian
3 Grant when I first got hired in '83.

4 Q Brian --

5 A Brian Grant, he was the first one that I
6 reported to.

7 Q And that's G-R-A-N-T, Grant?

8 A Uh-huh.

9 Q And that was 1983?

10 A Uh-huh.

11 Q Okay.

12 A We just walk around so much in there, so it's
13 kind of hard to remember everybody you report to. I'm
14 sure there were some others too, but I don't remember
15 all of them.

16 Q What about second level? Who is your second
17 level supervisor right now?

18 A April Ivy.

19 Q About how long has she been your supervisor?

20 A Let's see. She came in I think about four
21 years, four or five year.

22 Q Somewhere like '89?

23 A Could be.

24 Q And do you know who it was before April?

25 A Cherie Calvert.

- 1 Q And that's C-H-E-R-I-E?
- 2 A Yeah, C-A-L-V-E-R-T, I think.
- 3 Q V-E-R-T?
- 4 A Uh-huh.
- 5 Q Okay. And do you know who was it was before
6 Cherie?
- 7 A Let's see. It was Larry Rorroig. (Phonetic)
- 8 Q And that's R-O-R-R-E-R?
- 9 A I think it was -R-O-I-G, I think. Was it? I
10 think it's -R-O-I-G.
- 11 Q -R-O-I-G?
- 12 A I'm not sure.
- 13 Q Something like that?
- 14 A Yeah.
- 15 Q And those three and then?
- 16 A Let's see Shirley Perring. She was there as
17 well. When I first came, it was Booker. I can't think
18 of his first name.
- 19 Q Hampton Booker.
- 20 A Hampton Booker, he was there when I first
21 came to the test center.
- 22 Q Okay. Have you discussed this deposition
23 with anyone other than your attorney and Southern
24 Bell's attorney?
- 25 A No, not really.

1 Q When you say "not really," does that mean you
2 may have mentioned it to somebody?

3 A I probably mentioned, "Were you on the list
4 to go for a deposition?" but not really discussing it
5 or anything.

6 Q So I want to be real clear. Did you talk
7 about the substance of the questions that may be asked
8 or answers you may give during this deposition with
9 anyone?

10 A No, huh-uh.

11 Q Has anyone given you any assurance that you
12 would not be disciplined based on what you told us here
13 today?

14 A Yes. My attorney did and she also said that
15 Mr. Anthony did as well.

16 Q Has anyone discussed with you the possible
17 criminal penalties that would apply if you lied in this
18 deposition here today?

19 A Well, right. Yeah. I wouldn't lie, but
20 yeah.

21 Q But you're aware of the perjury that applies
22 to this deposition?

23 A Yeah.

24 MS. BAKER: Let me just object to that
25 statement.

1 MS. RICHARDSON: Perjury doesn't apply to
2 formal depositions --

3 MS. BAKER: Perjury is a conclusion of law
4 that somebody has lied and it's material and
5 intentional. Laws relating to perjury apply to any
6 under oath proceedings including this one.

7 MS. RICHARDSON: Thank you.

8 Q (By Ms. Richardson) We're all clear on that
9 now?

10 A Yes.

11 Q Let me ask you. Did you give a statement to
12 a company investigator regarding handling of trouble
13 repair reports?

14 A Yes, I did.

15 Q And then I need to ask you who was in the
16 room with you when you gave that statement?

17 A You mean when we first had the deposition,
18 when you first called us in?

19 Q Yes.

20 A It was -- I don't even know. A Southern Bell
21 attorney and another guy from West Palm Beach. I don't
22 even remember the names. It was like two years ago.

23 Q But it was an attorney. Was the other person
24 an attorney also?

25 A No, I think he was representing the Company,

1 but I don't think he was an attorney.

2 Q Was there a union representative involved?

3 A No.

4 Q As a maintenance administrator, what are your
5 basic duties? What do you do?

6 A Screen the troubles that come in from repair.

7 Q Are those residence and business troubles?

8 A Yes.

9 Q When they come in, they come in from the
10 CRSAB?

11 A Uh-huh.

12 Q So somebody has already received the trouble
13 from the customer and talked to the customer?

14 A Right.

15 Q Then you get the trouble record already
16 established when it comes to you?

17 A Right.

18 Q When you say "screen the trouble," what
19 process does that involve?

20 A Well, we have to determine whether or not
21 we're going to route out on the trouble or we're going
22 to give it to the central office, whether we're going
23 to close out the trouble and contact the customer or
24 whatever. That's what the screening is. Just isolate
25 the trouble to whatever, you know.

1 Q And when you do the screening process, is it
2 part of your training in what you do to determine
3 whether or not that trouble is out-of-service or
4 affecting service?

5 A Yes.

6 Q And how do you determine whether a trouble is
7 out-of-service?

8 A I test the line and wait for the test result.

9 Q And when is that decision made then to status
10 a trouble out of service? When in that screening
11 process?

12 A Well, I get the trouble, the customer says,
13 "No dial tone," or whatever. A lot of times the
14 trouble will come in without a service code on it or
15 whatever. A lot of times I retest the trouble because
16 a lot of times the phone could be unplugged, so it may
17 test open out and, you know, somebody would reported
18 it. So I'll get the trouble, I'll test it and it could
19 test open out.

20 If it's still open out, then I'm going to
21 route out on it, send a person out on it. If it
22 retests and it test fine, then I'm going to try to
23 contact the customer and ask him does he still have a
24 problem.

25 Q Okay. When you said "route out," you mean

1 dispatch?

2 A Dispatch out on it.

3 Q Dispatch out on it?

4 A Uh-huh.

5 Q Has anyone ever instructed you at any time
6 not to status a trouble out-of-service when you knew it
7 was out-of-service?

8 A Not me as an individual, no.

9 Q Were you present when instructions were given
10 not to status any out-of-services today?

11 A Yes, uh-huh.

12 Q Can you tell me when that occurred?

13 A I can't give precise dates.

14 Q Can you give me a year?

15 A In the '80s or whatever.

16 Q Would that be maybe between '85, '88, '89?

17 A Yeah, probably '85 -- '84, '85 or something
18 like that maybe.

19 Q Do you know where those instructions came
20 from?

21 A They came from management. They're the only
22 ones that could tell us.

23 Q Do you have a specific manager that you can
24 recall giving you those instructions?

25 A Not, not really.

1 Q Do you know if other maintenance
2 administrators in the test center followed those
3 instructions?

4 A Yeah, because sometimes we discussed it, so I
5 know they did.

6 Q Do you know why those instructions were given
7 not to status out-of-service today?

8 A We really didn't know why to tell the truth.
9 To us it was procedure. It was something to do that
10 day. If that is what needed to be done, then that's
11 what we did. But there was no reasoning for us, you
12 know, why they did it or why it was done.

13 Q At the time that it was done and you were
14 following the instructions not to status
15 out-of-service, did you form an opinion as to whether
16 or not that was proper or improper?

17 MS. BAKER: Object. You can go ahead and
18 answer.

19 A Well, yeah, I guess you do form an opinion,
20 you know. Whether or not that somebody said, well,
21 maybe that's not right or maybe it is right. If you
22 don't really have a reason for doing it, you really
23 don't think about it that much.

24 Q (By Ms. Richardson) Okay. At any time did
25 you feel that if you did not follow those instructions

1 to not status out-of-service today that you would be
2 disciplined?

3 A I may have been talked to. If they say do it
4 as an instruction -- if they say do it as an
5 instruction, you're going to do. If you didn't, you
6 expect to get reprimanded or talked to.

7 Q At any time were you given instructions to
8 not status out-of-service troubles up front, but to
9 status them on close out?

10 MS. BAKER: Object to the form.

11 A Not me personally, but it was given, yes.

12 Q (By Ms. Richardson) About what time?

13 A You mean the time frame?

14 Q Years, yes.

15 A About the same time, '84, '85. Something
16 along there. It could be, you know, later. But after
17 a while, it gets to be routine, so you really don't
18 know.

19 Q Do you know who gave you those instructions?

20 A No, because the management changed so much in
21 there so everybody that came in had the same rules. So
22 it just sort of reiterated what was going on that's
23 all.

24 Q Do you know if other maintenance
25 administrators were following those instructions?

1 A Yes, they were.

2 Q Based upon your conversations with them?

3 A Yes.

4 Q Do you know what affect -- let me back up. I
5 am going to ask a different question.

6 Are you presently aware of the Company's
7 objective that out-of-service reports be repaired
8 within 24 hours?

9 A Well, the time I know they had to repair them
10 within 24 hours, but I wasn't aware that if it wasn't,
11 that it was any big deal. You know, I didn't know if
12 it wasn't, you know, any repercussions from not doing
13 it.

14 Q Are you aware of that now today?

15 A Now I am, yes.

16 Q How did you become aware of that?

17 A I guess just by talking really among some of
18 the other employees. I really didn't know that if the
19 customer was out of service over 24, that he
20 automatically got a rebate. I didn't know that. At my
21 level, I didn't have to know that.

22 Q Do you have any idea about who made you aware
23 of that?

24 A Just some of the other MAs. We talked. You
25 know, we go to say, "You didn't know that?" You know,

1 because everybody hears differently, but as far as
2 someone telling us this, no.

3 Q Did you hear about it -- can you give me a
4 year or time frame about when you realized this or were
5 made aware?

6 A I only realized about maybe two or three
7 years ago that I did get one.

8 Q Are you aware presently of a Public Service
9 Commission rule that requires the Company to repair
10 out-of-service reports within 24 hours?

11 A I do now, yes.

12 Q And is that since 1990 that you were aware of
13 that?

14 A Something around there.

15 Q Were you aware of it before 1990?

16 A Well, I knew we had to repair them within 24
17 hours, but I really didn't think it had anything to do
18 with the PSC.

19 Q Great. Thank you. I'm communicating. I was
20 having trouble earlier, but evidently I'm communicating
21 now.

22 I would like to talk to you about backing up
23 the time. Have you heard those terms?

24 A Yeah.

25 Q And in what context have you heard the terms

1 "backing up the time?"

2 A I usually interpret it as meeting the
3 commitment. That's the way it's usually stated, if
4 they said it or whatever. But we say backing up
5 because that's what it really was. But management
6 probably would say meeting the commitment.

7 Q Okay. So management's terms were "meeting
8 the commitment." I need a definition of what that
9 means. What does it mean to meet the commitment?

10 MS. BAKER: If the witness knows.

11 Q (By Ms. Richardson) What's your
12 understanding?

13 A My understanding of it is you have a
14 commitment due by 3:00. Maybe it wasn't cleared until
15 3:30, so that means -- same thing as backing it up. We
16 have to meet the commitment, we're going to have to do
17 it before 3:00, right? So we'll do it like 2:55 to
18 meet the commitment, which is actually backing up the
19 time. It's the same thing.

20 Q Now, I need some further clarification on
21 commitment. On a trouble report, when you receive the
22 trouble report and it's sitting there in front of you.
23 Visualizing a screen for me. You have a customer's
24 name and address and you have the phone numbers up
25 there and you have the date and the time that the

1 trouble was received?

2 A Uh-huh.

3 Q And then you have another status line that
4 shows you a date and a time and C-O-M-M with a date and
5 a time after it. What does that C-O-M-M stand for?

6 A I'm not understanding what you're saying now.

7 Q Is there a time given at the beginning of a
8 report?

9 A There's time that the customer calls in.

10 Q And another time that's a --

11 A That it went to system, I guess, and there's
12 a time that it got to us.

13 Q Is a customer given a commitment by when the
14 Company will have the repair completed?

15 A I really don't know how they established that
16 commitment. I never did understand. I know they set
17 the clocks, but I never really understood exactly how
18 they went about giving the commitment to the customer
19 and I still don't.

20 Q But you do know the customer is told, "We're
21 going to have your trouble fixed by a certain
22 commitment time?"

23 A I know they give them a commitment. I'm just
24 saying I don't know how they go about arriving at the
25 commitment that they give them.

1 Q Okay. Now, my next question is, is a
2 clearing time different from a commitment time?

3 A It could be different, yeah. You could clear
4 it earlier than the commitment or clear it after the
5 commitment or whatever. Either way.

6 Q At what point in your handling of a trouble
7 report would the time be backed up?

8 MS. BAKER: Object to the form.

9 A If I'm screening the report?

10 Q (By Ms. Richardson) Yes.

11 A Well, it depends. If the report's been
12 sitting around for a long time and they have
13 objectives, also screening time that they want to meet
14 as well, so usually we used to just screen it one
15 minute after it came in and whatever, you know, route
16 out or whatever we're going to do with it.

17 Q On reports that are dispatched out, would you
18 back up a commitment time before an ST called in?

19 A No.

20 Q When the ST called in, would you back up the
21 commitment time at the top of the report or back up the
22 clearing time that you entered at the bottom of the
23 report?

24 MS. BAKER: Object. Compound question.

25 A Whatever commitment he tells me -- if it's at

1 one time, they had told us -- if a guy calls in, he
2 could have cleared it and give him dial tone before the
3 commitment. But a lot of times he wasn't able to get
4 through or he decided to finish some other work that we
5 was doing before he called in. It didn't mean that it
6 wasn't cleared at that time, it just means he just
7 didn't call at that time.

8 So a lot of times we would just assume that
9 if he says 3:30 and we figured he cleaned up and he did
10 this, that trouble had to be before 3:00. So we close
11 it out before then.

12 Q Okay. Did backing up the commitment time
13 have any effect on that 24-hour index?

14 A That was totally two different indexes. If
15 they wasn't in trouble of -- if they weren't in trouble
16 of missing the 24-hour commitment, then you may as well
17 make your other commitment.

18 Q Okay. What if they were in trouble?

19 A Of missing the 24?

20 Q Yes.

21 A They gave more than likely, we would probably
22 back it up.

23 Q Okay. Would that instruction come to you
24 from a manager?

25 A All the instructions -- we wouldn't make the

1 determination ourselves. It would have to come --
2 somebody else would have to tell us this.

3 Q Would you just sort of automatically do that?

4 A If something is happening for so many years
5 and no one ever came back and made it any different,
6 then you wouldn't change the format unless they came
7 and told you. You know, you would continue business as
8 usual. So if they said -- if 24 hours were very
9 important for us to meet, then that's what we would
10 look at. We'll try to meet it.

11 Q If an ST called you to close out his report
12 and he had already missed the 24-hour index, would you
13 question him as to when he actually cleared and
14 restored service?

15 MS. BAKER: Object as to form.

16 A We usually let him tell us when he cleared
17 it.

18 Q (By Ms. Richardson) And if he cleared it
19 after 24, would you back up the time?

20 A Chances of those -- the clear time he would
21 give us would be before the 24 anyway, so we really
22 wouldn't have to make that decision most of the time.

23 Q If you did have to make the decision -- well,
24 let me ask you.

25 Were there any times when you did have to

1 make the decision?

2 A Sometimes, yes.

3 Q What was the decision you made?

4 A I would meet the commitment. I would make
5 the 24.

6 Q Okay. Now, I would like to ask you about
7 disposition codes and cause codes. Can you just kind
8 of give me a general description of what they are?

9 A Those are whatever codes that isolate
10 whatever trouble they cleared or however you clear it.
11 Those are the codes that you use.

12 Q Okay. Are there certain disposition and
13 cause codes that would exempt a report from being
14 counted against the Company in the out-of-service-over
15 24-hour index?

16 MS. BAKER: If she knows.

17 MS. RICHARDSON: I asked are there.

18 A I think there are, but I don't really know
19 what the codes are.

20 Q (By Ms. Richardson) But you're aware that
21 some may do that?

22 A Yeah, I do remember just one. But I wasn't
23 even sure that it did anything, but there's only one
24 that I really knew and that had to do with cable. And
25 that was the only one that I knew.

1 Q That was a multiple cable failure?

2 A Yes.

3 Q Were you given any instructions to use a
4 multiple cable failure code when you felt it did not
5 apply?

6 A No, because I really wasn't familiar with the
7 multiple cable failure code, so whatever code they said
8 was fine with me.

9 Q Were you familiar with anyone using the
10 multiple cable failure code to help with meeting the
11 index?

12 A Well, I remember one instance that I was
13 speaking to someone and I just -- it was concerning
14 cable failures because everybody is a little afraid of
15 closing out cable failures because it entails a lot of
16 troubles. So if you close it out and make one mistake
17 and you miss it, that means a hundred troubles that are
18 attached to that failure, you missed all of them.

19 So I was just speaking to one of the managers
20 there, and I just asked, you know, that I hated to
21 close them out. And she said, well, she didn't know
22 why people are so afraid to close them out. Just
23 always remember to close them out cause code 420.

24 I never knew what it meant, but that's what
25 she said. So evidently I assume maybe that was a code

1 that wouldn't be counted or whatever. So I said okay.

2 Q Okay. So from that point on, did you close
3 all cable failures to that same cause code?

4 A Whenever I closed them out, which was very
5 seldom, because I didn't close out many failures, but,
6 yeah, I would use 420.

7 Q Do you know what it is to exclude a trouble
8 report?

9 A Yes.

10 Q Will you tell me what happens when you
11 exclude a trouble report?

12 MS. BAKER: Object to the form. Time frame,
13 really.

14 Q (By Ms. Richardson) Let's go back prior to
15 1990.

16 A This exclude practice -- we have a list of
17 exclude codes anyway that are valid that we use. So
18 whatever those codes were, those were the only ones we
19 could really use anyway to exclude a trouble.

20 Q And what happened to the trouble report
21 itself when you excluded it?

22 A Well, we just -- it was in the data base, but
23 it really wasn't there, I guess, when we excluded it.

24 Q Would it show up in any of the indexes, if it
25 was excluded?

1 A No, these were acceptable exclude codes that
2 -- I guess they really didn't fall into any category.
3 I really don't know how they did it to tell the truth.

4 Q Let me ask a more specific question. In your
5 opinion, before 1990, was it proper to exclude an
6 out-of-service report?

7 MS. BAKER: Object. No foundation for her
8 opinion.

9 A Well, all I remember is when I first in the
10 test center, we did have a -- we were paper then when I
11 first came in. And I do remember -- because I wasn't
12 familiar with what was going on anyway, but everything
13 was paper and I do remember that they used to close out
14 -- if the trouble was missed, they would excluded it
15 and say "status error," and they would bring the
16 trouble back up like that. Or if they knew that they
17 had already missed the commitment on the trouble or
18 whatever, they're just excluded. A status error.

19 Q Okay. And if they had missed the commitment
20 and excluded it, would they also bring up that report
21 and reenter it?

22 A Yes.

23 Q Would they reenter it with the original date
24 and time?

25 A Date, time and commitment and closed it out

1 and meet the commitment, yes.

2 Q As meeting the commitment?

3 A (Witness nods head affirmatively.)

4 Q Would that involve backing up the time on
5 that second regenerated report to meet the commitment?

6 A Well, actually it's like a new report so
7 you're not really backing up anything, you're just
8 putting everything into perspective, you know, just
9 like a new report. You came in, you did it, you met
10 the commitment, you closed it out.

11 Q But the first time you didn't meet it?

12 A That's why it was excluded.

13 Q That's why it was excluded?

14 A Yes.

15 Q Have you heard the terms "building the base"?

16 A I heard them talking about it.

17 Q What does it mean to you?

18 A Well, I guess they had a certain objective
19 they had to meet and maybe they were below that
20 objective and all it said was, "Bill it out of
21 service." They needed more out-of-services depending
22 upon what area they needed it in. You know, like
23 Homestead or Miami or whatever. I assume that's what
24 it is. I'm not stating that's what it is.

25 Q That's your feeling?

1 A That's my feeling of what they were trying to
2 do.

3 Q Have you ever heard of anyone building the
4 base?

5 A Well, what they would tell you if a trouble
6 came in and if it tested okay, or however it tested,
7 and you were closing it out during the screening
8 process, they would want you to status it
9 out-of-service after the fact. Considering you met the
10 commitments and you met 24 and met the customer's
11 commitment, then you can show a "Y" and close it out as
12 out of service. And that will build the out-of-service
13 base. Now, that's my understanding of how it was done.
14 I don't know.

15 Q Now, I want to clarify for the record, when
16 you say "show a Y," are you talking about the final
17 status screen?

18 A Right. When you do your last line of FST,
19 when you're closing out the trouble report. And you
20 want to show it out-of-service after the fact rather
21 than it was shown before the fact, and you put a "Y"
22 there as out-of-service and account it as clearing out
23 of service before the commitment.

24 Q And can you tell me how long this practice --
25 what period of time?

1 A This happened around the '80s, I think,
2 basically.

3 Q Do you know when that practice stopped?

4 A Probably two, two or three years ago when the
5 investigation started, I guess.

6 Q Has the criteria for statusing a report as
7 out-of-service changed during the period of time 1983
8 to present?

9 A Has it changed? Of course it's changed.
10 What do you mean, like -- specify. I don't understand,
11 change from where?

12 Q All right. Good. Let me get tighter on it.
13 And any time you have a question about my question,
14 please ask because you need to be comfortable that
15 you're answering my question. That's fine.

16 Let's back up to 1990. Were there any
17 changes in 1990 to the way you statused out-of-service
18 reports?

19 A Yeah, they're out of service, they're
20 out-of-service.

21 Q Okay. Were you given new criteria for
22 determining if it was out of service?

23 A We got some new -- see we have like
24 out-of-service codes so they implemented some new ones
25 also. And then our own determination we call the

1 customer even when we come and test-OK; and I call the
2 customer, there's a lot of static and he can't hear me,
3 he can barely talk even though he's testing okay. A
4 test-OK is not really an out-of-service code. I would
5 still status out because he really doesn't have any
6 service, so I would make that determination myself.

7 Q Are you familiar with no-access codes?

8 A Not really, because I really didn't do to
9 much of no accessing. You know, sometimes they would
10 give it to me to do. Just give us a code and we would
11 close it out and hold the trouble for three days, the
12 customer didn't call back in, then we closed the
13 trouble out.

14 Q Have you ever closed a no-access trouble that
15 was not dispatched out?

16 A There was no way you could do that because it
17 would be no-access if we never went out on it.
18 Somebody has to go out on it in order for us to close
19 it out no-access.

20 Q Have you ever no accessed a report when you
21 knew that it was not a no-access?

22 A No.

23 Q Would you explain to me what a central office
24 failure is?

25 A It could be any number of failures. It could

1 be -- if a central office fails, something happened
2 inside the CO or something could have happened there.
3 I don't know. A alarm went off, anything could have
4 happened that caused a customer to go out of service.
5 Anything that happened inside the central office is
6 considered a central office failure.

7 Q Okay. Are you aware of any trouble reports
8 that were improperly closed to central office failures?

9 A I don't know of any personally that was
10 closed improper, no. They usually give us the codes;
11 however, if they determine if it was in the CO, they
12 usually give you the central office code.

13 Q So when you say "they give you the code," you
14 mean the central office?

15 A Central office would use it. If they cleared
16 it inside, then it's -- then it goes to the central
17 office because a lot of time the central office, if
18 they cut, like, you know -- I guess it depends. The
19 trouble sometimes looks like it's in the CO and it may
20 be out. And the trouble with it, they may wind up
21 clearing it outside then they would close the outside
22 code. But if it was the central office, they usually
23 give us a code to close it out. So I don't know.

24 Q Were you ever instructed to close out
25 out-of-service reports to a central office code?

1 A I wasn't, no, huh-uh.

2 Q Do you know of anyone else who was?

3 A Just speculation or hearsay, that's it.

4 Q What did you hear?

5 A I just heard someone say that we had a
6 failure once that was closing -- that was a central
7 office failure and it was closed out to test-OK or
8 something like that.

9 Q Did you hear why that was done?

10 A I really don't know why it was done. I don't
11 have no idea.

12 Q Do you handle service orders?

13 A In a limited amount, yes.

14 Q Can you explain to me how you handled it or
15 what your responsibilities are in handling service
16 orders?

17 MS. BAKER: Are we are talking about the
18 present time? Your questions are present.

19 Q (By Ms. Richardson) When did you handle
20 service orders, at what time?

21 A Probably about three or four years now. The
22 only time I come in contact with service orders is when
23 the repairmen goes out. What we do is, if he goes out
24 on a report, he doesn't have a dial tone out there,
25 what he does is he calls DTAG, which is what I'm doing

1 now. And I pull the service order up and I just
2 release the service order. That's it. But give the
3 customer a dial tone is what it is.

4 Q Would that be a trouble report?

5 A No, that's a service order.

6 Q It would be a service order?

7 A Uh-huh.

8 Q I'm sorry. I'm losing it. When the customer
9 called up? Is that what you said?

10 A No, no. A service order is a customer called
11 up, he wants service and location. The guys get
12 dispatched out on the service order. When he works the
13 service order -- usually if he's out there on a service
14 order and he completes the order, he doesn't have dial
15 tone on the pair that he's on and he will give it up
16 the dial tone assistance group, which is us, and we
17 will pull the service order; we verify everything on
18 the service order, go into RMC system where we switch
19 --

20 Q The RMAS?

21 A Yes, which is the switch and we release the
22 order to the switch. We then give him dial tone
23 outside. But that's the only thing I have to do with
24 service orders.

25 Q Okay. Is there a requirement that service

1 must be installed within a certain period of time?

2 A On service orders? I don't -- I really don't
3 know how they go about setting up the dates. But they
4 go through the business office, so I don't know how
5 they set up the dates. Depending on the load, I guess.
6 I'm not sure. That's how they used to set up the dates
7 for the service orders.

8 Q Have you ever been involved in selling
9 customer services, Ms. Farmer, for the Company?

10 A No, I really didn't do that too much. We
11 only -- well, we started a little bit but no.

12 Q When you say "we started a little bit --"

13 A When we first came there we used to, you
14 know, call customers, sell some of the features. But I
15 don't do it that much myself.

16 Q And that was back in 1983 then?

17 A That's in the '80s, yeah. '83 or '84,
18 something like that.

19 Q Okay. Are you aware of anyone who may have
20 recorded a sales to a customer that the customer never
21 ordered?

22 A I'm not aware of it, no.

23 Q Did you, yourself, ever record a sales to a
24 customer that the customer never ordered?

25 A No.

1 Q Did anyone ever instruct you to record a
2 sales to a customer that the customer never ordered?

3 A No.

4 Q Did you ever participate in a boiler room
5 operation of sales?

6 A Absolutely not.

7 MS. BAKER: Object to the form.

8 Q (By Ms. Richardson) Okay. Ms. Farmer, I
9 think, at this point, I've run out of questions unless
10 my memory gets jogged. I really appreciate your time
11 and I appreciate your waiting.

12 The Commission may have a couple of questions
13 for you before you go and Mr. Anthony may have some and
14 your attorney may want to add something to the record.
15 Okay. Thank you.

16 EXAMINATION

17 BY MS. WILSON:

18 Q I just wanted to ask you, on those days when
19 you were told no OOS, would that be like a one-day
20 period or two-day period? Do you recall?

21 A It wasn't like that. It was kind of hard to
22 explain. I know basically on the weekends, you know --
23 you mean like status out-of-service?

24 Q Yes.

25 A We didn't do it on weekends, but so far as

1 during the week, it could have continued because no one
2 told you not to or vice versa. So it would just depend
3 on when they decided to say okay we need to whatever,
4 status out-of-service or not. But it wasn't like a
5 day-to-day thing. It was a continuation and then they
6 may say, okay, we need to do this because this part may
7 be okay and now we need to work on this part.

8 Something like that; best to my knowledge.

9 Q Would that be like throughout the month or
10 different times of the month it happened with more
11 frequency, or is it hard to say?

12 A It's hard to say.

13 Q Would it generally continue, let's say, for
14 example, when you status something out-of-service,
15 would that be for like maybe a couple of days. I know
16 I've already asked you this, but is it possible that
17 they may have said only do it for part of the day? Was
18 it generally for a day or a couple of days until you
19 were told to do otherwise?

20 A It could go on like. The only one that I
21 just really remember -- it's kind of hard to say, like
22 I say, if start doing it, you just do it. Sometimes
23 you're not even aware that maybe you should be stopping
24 because you haven't got the word or something, you
25 know, like that. And a lot of times -- I just remember

1 in the Keys, because the Keys is very small, so if you
2 miss like one out-of-service, you can throw your whole
3 objective. So that was the one that I remember because
4 we really had to be very careful on that one.

5 MS. WILSON: Okay. Thank you very much.

6 EXAMINATION

7 BY MR. VINSON:

8 Q Could there have been other areas other than
9 the Keys where that was done?

10 MS. BAKER: Object to the form.

11 A Well, if you got a lot of reports in Perrine,
12 you got a whole lot of reports, it wouldn't make that
13 much difference if, you know, you were able to afford
14 to miss more than in a smaller area because your
15 objective is a lot more.

16 MR. VINSON: That's all the questions I have.

17 MR. ANTHONY: I don't have anything. Thank
18 you.

19 MS. BAKER: I have no questions.

20 (Thereupon, the deposition concluded at 10:25
21 a.m.)

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This is to certify that I, LAURA D. FARMER, have read the foregoing transcription of my testimony, Page 1 through 39, given on April 20, 1993 in Docket No. 910163-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

LAURA D. FARMER

Sworn to and subscribed before me this _____ day of _____, 19____

NOTARY PUBLIC

State of _____

My Commission Expires:

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F L O R I D A)
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C O U N T Y O F L E O N)

CERTIFICATE OF OATH

I, the undersigned authority, certify that
LAURA D. FARMER personally appeared before me and was
duly sworn.

WITNESS my hand and official seal this
12th day of May, 1993.

Pamela A. Canell

PAMELA A. CANELL
Notary Public - State of Florida



PAMELA A. CANELL
MY COMMISSION # CC 248413 EXPIRES
December 16, 1996
BONDED THRU TROY FAIR INSURANCE, INC.

1 STATE OF FLORIDA)
 :
2 COUNTY OF LEON) CERTIFICATE OF REPORTER

3
4 I, PAMELA A. CANELL, Official Commission
Reporter,

5 DO HEREBY CERTIFY that I was authorized to
and did stenographically report the foregoing
deposition of LAURA D. FARMER

6 I FURTHER CERTIFY that this transcript,
7 consisting of 39 pages, constitutes a true record of
the testimony given by the witness.

8 I FURTHER CERTIFY that I am not a relative,
employee, attorney or counsel of any of the parties,
9 nor am I a relative or employee of any of the parties'
attorney or counsel connected with the action, nor am I
financially interested in the action.

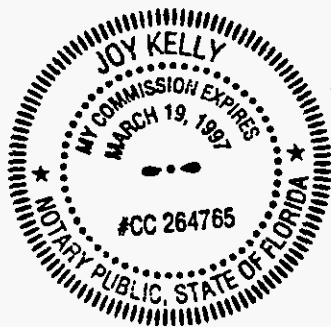
10 DATED this 12th day of May, 1993.

11
12 Pamela A. Canell
PAMELA A. CANELL
13 Official Commission Reporter
Telephone No. (904) 488-5981

14
15
16 STATE OF FLORIDA)
 :
17 COUNTY OF LEON)

18 The foregoing certificate was acknowledged
19 before me this 12 day of May, 1993, by PAMELA A.
CANELL, who is personally known to me.

20
21 Joy Kelly
22 Joy Kelly
Notary Public - State of Florida



ERRATA SHEET

DOCKET NO. 910163-TL
NAME: LAURA D. FARMER
DATE: April 20, 1993

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Page	Line	
8	19	Strike "Renee" and insert in its place "Maria." REASON: The reporter transcribed the wrong word.
9	12	Strike "walk" and insert in its place "move." REASON: The correction is needed so that my answer makes sense.
19	7	Strike "I did" and insert in its place "they." REASON: The correction is needed so that my answer makes sense.
28	9	After "first" add "came." REASON: The reporter dropped the word.
29	20	Strike "Bill it" and insert in its place "build." REASON: The correction is needed so that my answer makes sense.
32	17	After "would" add "not." REASON: The correction is needed to make the answer I gave accurate.
33	21	Strike "close the" and insert in its place "use an." REASON: The correction is needed so that my answer makes sense.
35	15	Strike "yp" and insert in its place "to." REASON: The reporter transcribed the wrong word.
35	18	Strike "RMC" and insert in its place "RMS." REASON: The correction is needed to make the answer I gave accurate.
36	15	Strike "don't" and insert in its place "didn't." REASON: The correction is needed to make the answer I gave accurate.

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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

:
In the Matter of
:
Investigation into the
integrity of SOUTHERN BELL
TELEPHONE AND TELEGRAPH
COMPANY'S repair service
activities and reports.

DOCKET NO. 910163-TL

DEPOSITION OF: LAURA D. FARMER

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

PLACE: 666 N.W. 79th Avenue
Room 640
Miami, Florida

TIME: Commenced at 9:45 a.m.
Concluded at 10:25 a.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: Pamela A. Canell
Official Commission Reporter

AFFIDAVIT OF DEPONENT

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Laura D. Farmer
LAURA D. FARMER

Sworn to and subscribed before me this

4 day of August, 1993

Karen Osbourne

NOTARY PUBLIC

State of Florida

My Commission Expires:

