

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL
FILED: June 16, 1993

920260 -TL

In re: Petition on behalf of
CITIZENS OF THE STATE OF FLORIDA
to initiate investigation into integrity of
SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY'S
repair service activities and reports.

DEPOSITION OF: JOHN SEILER

DATE: June 29, 1993

TIME: Commenced at: 9:45 a.m.
Concluded at: 10:15 a.m.

PLACE: Southern Bell Telephone and Telegraph Co.
666 Northwest 79th Avenue, Room 674
Miami, Florida 33126

REPORTED BY: JOHN J. BLUE,
Registered Professional Reporter,
Notary Public, State of Florida At Large
Suite 1014, Ingraham Building
25 Southeast 2nd Avenue
Miami, Florida 33131

TAKEN BY: The Citizens of Florida, by and through
Janis Sue Richardson,
Associate Public Counsel

PURSUANT TO: Florida Rule of Civil Procedure
1.310 (b) (6)

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I-N-D-E-X

WITNESS

DIRECT CROSS

John Seiler

(Ms. Richardson)
(Mr. Pierson)

4, 28
28

EXHIBITS

(None)

1 THEREUPON:

2 JOHN SEILER,

3 having been first duly sworn, was

4 examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. RICHARDSON:

7 Q. Mr. Seiler, would you please state your name and spell
8 it for the Court Reporter?

9 A. John Seiler, S-e-i-l-e-r.

10 Q. And your address, please?

11 A. 8101 Northwest 90th Street, Medley, Florida.

12 Q. And the Zip Code?

13 A. 33014.

14 Q. Is that a business address?

15 A. Yes, it's a company shop.

16 Q. And the phone number?

17 A. 884-1671.

18 Q. Are you represented by an attorney here today?

19 A. Yes, I am.

20 MS. RICHARDSON: I'll ask him to place his appearance
21 on the record.

22 MR. DUNBERG: Attorney Richard G. Dunberg, 7600 Red
23 Road, Suite 229, Miami, Florida 33143.

24 MS. RICHARDSON: Thank you.

25 Q. (BY MS. RICHARDSON): Mr. Seiler, have you discussed

1 this deposition here today with anyone other than your attorney
2 or counsel for Southern Bell?

3 A. No, I haven't.

4 Q. Has anyone advised you that you would not be
5 disciplined based upon whatever you told us here today?

6 A. Yes.

7 Q. Has anyone discussed with you the possible criminal
8 penalties that could apply if you perjure your testimony here
9 today?

10 A. No.

11 Q. If at any time I ask you a question that you don't
12 understand, need me to rephrase it or add to it, just ask me;
13 and if at any time you feel like you need to discuss something
14 with your attorney off the record, just let us know and we'll
15 stop the proceedings and you can have a private discussion.

16 A. Okay.

17 Q. Have you given a statement to the company in the past?

18 A. Yes.

19 Q. Do you remember when you gave that statement?

20 A. Couple years ago. Couple years ago, that's all I can
21 remember.

22 Q. Did you give more than one?

23 A. Yes.

24 Q. How many statements did you give to the company?

25 A. Two.

1 Q. Do you remember when you gave the first statement?

2 A. No, I don't know the exact dates.

3 Q. But that one was at least two years ago?

4 A. Two or three, yeah. '89, I think it was.

5 Q. '89?

6 A. Maybe four.

7 Q. Do you remember who was in the room with you when you
8 made that statement?

9 A. Somebody from Security.

10 Q. Was there an attorney present at that time?

11 A. No, not that I remember.

12 Q. Are you in the Union?

13 A. Yes.

14 Q. Was there someone from the Union there?

15 A. No.

16 Q. And when did you give the second statement?

17 A. A little bit after that, I guess three months later.

18 Q. Do you remember who was in the room with you when you
19 made that statement?

20 A. Couple lawyers representing the company.

21 Q. Was there a Union person present then?

22 A. No.

23 Q. Did you have your own attorney present?

24 A. No.

25 Q. Did you discuss either of those two statements with

1 anyone after you had made them?

2 A. No.

3 Q. Who's your Union Steward right now?

4 A. Ray Smith.

5 Q. What is your present position with the company?

6 A. Facility Technician.

7 Q. And how long have you held that position?

8 A. 13 years.

9 Q. Has all of that time been here in Miami?

10 A. Yes, it has.

11 Q. And do you work a particular geographic area of Miami?

12 A. North Dade.

13 Q. Who's your first level manager right now?

14 A. Gary Sandellin.

15 Q. S-a-n-d-e--?

16 A. -- l-l-i-n.

17 Q. How long has Mr. Sandellin been your first level

18 manager?

19 A. Almost two years.

20 Q. Do you recall who it was before Mr. Sandellin?

21 A. Bob Reese.

22 Q. And R-e-e-- ?

23 A. -- s-e.

24 Q. -- s-e. And who was it before Mr. Reese, do you

25 remember?

- 1 A. Bob Welt.
- 2 Q. Is that "W-e-l-l-s"?
- 3 A. "W-e-l-t."
- 4 Q. "Welt." All right. Can you go back one--
- 5 A. One more?
- 6 Q. -- step further?
- 7 A. No, that's about as far as I can remember.
- 8 Q. All right. Who is your second level manager right
- 9 now?
- 10 A. Tom Langen.
- 11 Q. Can you spell his last name now?
- 12 A. I think it's L-a-n-g-e-n. I'm not quite sure on that
- 13 one.
- 14 Q. And how long has he been your second level manager?
- 15 A. About two years.
- 16 Q. Do you recall who it was before Mr. Langen?
- 17 A. Charlie Little.
- 18 Q. Do you recall how long Mr. Little was your second
- 19 level?
- 20 A. About three years.
- 21 Q. Can you go back one step further than Mr. Little?
- 22 A. Joe Lesko.
- 23 Q. And how long was Mr. Lesko your second level manager?
- 24 A. About two years.
- 25 Q. Who is your present Operations Manager?

- 1 A. Ralph De La Vega.
- 2 Q. And how long has he been your Operations Manager?
- 3 A. Four years, I guess.
- 4 Q. Do you recall who it was before Mr. De La Vega?
- 5 A. Sellers. I don't know his first name.
- 6 Q. Jack?
- 7 A. Yes, Jack.
- 8 Q. Do you recall how long Mr. Sellers was the Operation
9 Manager?
- 10 A. No, I don't.
- 11 Q. What do you do as a Facility Technician?
- 12 A. I work on the cable repair side of the district,
13 repairing cable troubles, individuals, cable failures, et
14 cetera.
- 15 Q. Would that deal with residential and business?
- 16 A. Yes. Nothing to do with inside; it's all cable.
- 17 Q. All right.
- 18 A. Residential and business.
- 19 Q. All right. How do you presently handle trouble
20 reports?
- 21 A. I don't understand the question.
- 22 Q. Are you able to code status and clear and close
23 trouble reports on your own now?
- 24 A. Yes, we are, with the computer access terminal.
- 25 Q. And how long have you had a CAT?

1 A. About a year.

2 Q. And before you had the CAT terminal, how did you
3 status trouble reports?

4 A. Called up the maintenance center, and closed them out.
5 Picked up troubles and closed them out with the maintenance
6 center.

7 Q. Did you ever get more than one trouble at a time when
8 you were calling the maintenance center for troubles?

9 A. Occasionally, yes.

10 Q. Were all of the ones that you got when you got
11 multiple troubles, were they all bulk status troubles?

12 A. The bulk status troubles would probably be cable
13 failure, all within a certain count.

14 But not really bulk status, no. Cable repair isn't
15 like the service installation.

16 Q. All right. Before you had the CAT, I want to focus on
17 the time period when you were still working directly with the
18 maintenance center to get your reports and to also close your
19 reports.

20 A. Uh-huh.

21 Q. When you received the trouble reports that came to you
22 were they already stasured as out of service or affecting
23 service?

24 A. Yes, they were.

25 Q. Were most of the cable reports that you received

1 affecting service when you received them?

2 A. I don't understand what you're talking about,
3 affecting service.

4 Q. All right. Not out of service. Stated.

5 A. Most of them? No.

6 Q. Was there ever an occasion when you were working cable
7 reports that you were directed to complete the statusing of out
8 of service at the close out of the report, because it hadn't
9 been done up front, so the statusing would be left up to you?

10 A. Now what do you mean by "statusing"? You mean closing
11 out the trouble? We were told to close out the trouble as soon
12 as we finished it.

13 Q. Let me break it down further then.

14 A. I don't understand the question.

15 Q. Yes, I'm sure, I'll bet you don't. I got that
16 impression; so let's start again. If I'm not clear, let's just
17 keep working on it--

18 A. Okay.

19 Q. -- until you're sure that you're answering what I'm
20 asking. That way you'll be comfortable with whatever you've
21 told me.

22 A. Okay.

23 Q. When you have a trouble report that comes across to
24 you as a report that's not out of service, the customer has
25 some dial tone, they can use some limited use of their phone

1 and it's not out of service--

2 A. Uh-huh.

3 Q. -- have you ever had occasion on those type of reports
4 where you've gone out on the report and you found that by the
5 time you got there that they didn't have any dial tone and they
6 were clearly out of service?

7 A. Yes.

8 Q. All right. At that point, when you closed that report
9 out after you'd fixed everything, were you called upon to
10 restatus them as out of service to show that they had been when
11 you worked on them?

12 A. They asked me if the customer was out of service when
13 I got there. I said yes or no, depending on the situation.

14 Q. So on those particular reports then, those reports
15 were stasured at close out, is that right?

16 A. Yes.

17 Q. All right. Now, when you received, at any point
18 before you had the CAT terminal, was there a procedure where
19 all of the reports, all the cable reports that you received
20 came across to you as affecting service and you were then to
21 direct the M.A. on close out whether or not it was out of
22 service or affecting service?

23 A. No.

24 Q. On the cable failures, the multiple cable failure
25 reports that you received, at any time were those reports sent

1 across to you as affecting service or not out of service
2 reports?

3 A. No, they were always out of service.

4 Q. Clearly?

5 A. (Nods yes)

6 Q. All right. Now that you have a CAT terminal, do
7 reports come to you already statused off service or affecting
8 service?

9 A. Yes.

10 MR. BEATTY: Object to the form of the question. It
11 presupposes facts that are not in this record.

12 MS. RICHARDSON: I believe he said he has a CAT
13 terminal.

14 MR. BEATTY: I know. The issue is your use of the
15 word "now."

16 Q. (BY MS. RICHARDSON): With your CAT terminal,
17 Mr. Seiler--

18 A. Uh-huh.

19 Q. -- did reports come across to you as affecting service
20 and out of service statused up front?

21 A. Yes.

22 Q. Has there been any occasion with you working at the
23 CAT terminal that all the reports you received were statused as
24 affecting service?

25 A. All the reports?

1 Q. Yes. Left, in other words, in affecting service
2 status, rather than being statused out of service up front.

3 A. She lost me again on that question.

4 Q. All right. Let me try this again.

5 Was there ever a time with the CAT terminal where you
6 were directed that the reports would be coming to you as
7 affecting service and you were to determine the status on close
8 out?

9 A. No.

10 Q. Can you status a report on close out with your CAT
11 terminal?

12 A. No.

13 Q. If you have an affecting service today, a report
14 that's not out of service, and you find that they have no dial
15 tone by the time you get out there, what is the procedure for
16 changing that status to out of service on close out?

17 A. I don't even bother with it. Because by the time I
18 get it, it's "get the customer fixed." So I don't tell--

19 They ask me on a cable failure; but on an individual I
20 I don't even mess with it, because 90 percent of the time
21 they're out of service anyway.

22 Q. Okay. Are you aware of the company requirement that
23 out of service reports be cleared within 24 hours?

24 A. I've heard of that, yes.

25 Q. Are you aware that the Commission, the Public Service

1 Commission, requires the company to clear at least 95 percent
2 of its out of service reports within 24 hours?

3 A. I wasn't aware of that, no.

4 Q. Do you know if a customer is due a rebate if they're
5 out of service more than 24 hours?

6 A. I've heard of that, yes.

7 Q. How long have you been aware of that?

8 A. I'd say a year or two years.

9 Q. Do you know of any customer who may not have received
10 a rebate because they were not statused out of service when
11 their line had clearly been out of service?

12 A. No, I don't.

13 Q. On the multiple cable failures that you work with, do
14 you receive bulk reports that come together like a whole series
15 of line numbers maybe attached to a lead ticket?

16 A. On the CAT, it's-- they give me a lead number and then
17 they tell me how many reports after that; and I have to call up
18 and get the numbers and the cable repair information from them.

19 Q. All right. Before you had the CAT terminal, and did
20 you also have the bulk cable failures where you'd have a lead
21 ticket with some reports attached to it?

22 A. It was given to me that way, yeah, a lead number with
23 individuals after it.

24 Q. All right. Did you ever have occasion where you would
25 get the lead ticket would be an affecting service ticket and

1 there might be some individual out of service reports attached?

2 A. No.

3 Q. Did you ever get an out of service ticket as a lead
4 ticket with perhaps a few affecting service attached?

5 A. Yes, that's happened.

6 Q. When you closed out that out of service lead ticket
7 do you know if that changed the status--

8 A. I don't know.

9 Q. -- on those others? Were you ever asked to separate
10 out, detach the affecting service tickets from that lead out of
11 service ticket?

12 A. No, I wasn't.

13 Q. Do you know if that was done by the M.A. when she
14 closed it out when you called in?

15 A. There was no way of me knowing, seeing as I'm out in
16 the field and she's up there in the office. I had no idea what
17 was going on up there.

18 Q. When you were closing out with the Maintenance
19 Administrator what kind of information would you have to give
20 her to get that report finished?

21 A. To close it out?

22 Q. Yes.

23 A. Trouble address, where I found the trouble, what I did
24 to fix the trouble, cause codes, disposition codes, clearing
25 time, the time I closed, what time did the customer get

1 service.

2 Q. Is the clearing time and the time that customer got
3 service two different times?

4 A. No, it's the same thing.

5 Q. They are the same thing?

6 A. (Nods yes)

7 Q. I'd like to talk about the codes for a minute. You
8 said disposition and cause code?

9 A. (Nods yes)

10 Q. Can you briefly tell me what a disposition code is?

11 A. That's basically where you found the trouble, what
12 part of the plant did you find the trouble in? Was it a
13 closure, was it a splice, was it a cross box? Each one is--
14 that's aware. Then the cause is the cause, what caused it to
15 go, you know, to fail.

16 Q. Can you give me an example of a cause on a cable
17 failure?

18 A. Corrosion, moisture, you have a hurricane; you know,
19 things like that.

20 Q. Do you know if there are certain disposition and cause
21 codes that would keep a report from being counted as a miss if
22 it had gone over 24 hours?

23 A. No, I don't know anything about that.

24 Q. Do you know of anyone who has directed you to use
25 certain disposition and cause codes on trouble reports when you

1 didn't think that they really applied?

2 A. No.

3 Q. In terms of the moisture code, the use of the moisture
4 code, if the problem was caused by a ring cut, and moisture had
5 seeped into the cable, which cause code would you use?

6 MR. BEATTY: Object to the form of the question. It
7 calls for speculation.

8 Q. (BY MS. RICHARDSON): Have you ever had a problem, an
9 out of service report that was caused by a ring cut that had
10 moisture get into the line?

11 A. A ring cut, I assume you're saying caused by craft?

12 Q. Yes.

13 A. Then I showed a craft code.

14 Q. All right.

15 A. And I would write in there "moisture in splice," and
16 then the cause code would be the craft.

17 Q. Would that be a 200 number?

18 A. One hundred I believe is craft.

19 Q. One hundred number, okay. You indicated that you also
20 gave a clearing time on reports. Would your clearing time be
21 the same time as your closing time?

22 A. No, it wouldn't.

23 Q. Why would that not be the case?

24 A. If let's say I had three different areas that I took a
25 measurement, opened up the cable, found the trouble was not

1 there; I would leave that cable open, take another measurement,
2 find the trouble, fix the trouble. Then once they were
3 cleared, then I'd close up everything that I had done. The job
4 would be completely finished when I closed out.

5 Q. On out of service reports over 24, were you ever
6 directed by anyone to back up your clearing time to within a
7 minute of the 24-hour period?

8 A. No.

9 Q. Were you ever required or requested to back up your
10 clearing time to show that it was cleared within 24 hours when
11 it had not been?

12 A. No, I wasn't.

13 Q. Do you know of anyone who has done that?

14 A. No. It's just rumors is all I hear.

15 Q. What kind of rumors have you heard?

16 A. Standard. Moaning and groaning about not making a
17 commitment and stuff, but that's about it. That's just amongst
18 us, in the yard.

19 Q. And that's been in the North Miami, North Dade yard?

20 A. Yes.

21 Q. When you've heard these rumors did you form any
22 impression as to whether these were discussions of actual
23 events?

24 A. No. Didn't really think about it.

25 Q. I guess I'd better make the record clear, too.

1 Have you yourself ever backed up a clearing time on a
2 service report to show that it was cleared within 24 hours--

3 A. No, I haven't.

4 Q. -- when it had not been?

5 A. (Shakes head in the negative)

6 Q. When you say meet the commitment, is "commitment," for
7 you, synonymous with "clearing time" or that 24-hour time?

8 A. Yes, it is, to me.

9 Q. All right. Mr. Seiler, I'm going to show you a
10 document that's entitled Citizens Third Set of Interrogatories.
11 An interrogatory is a question I've put down in writing and
12 mailed to the company and they have sent me a written answer
13 back. This is dated June 6, 1991.

14 And we asked the company to give us the names of
15 employees who had knowledge about falsifying the completion
16 times on repair reports.

17 And the company responded with a

And

e

18
19
20 What I will do at this point is to go off the record
21 and let you read this document and if you want to discuss it
22 with your attorney. When you're ready to answer some questions
23 about it, then we'll go back on the record.

24 A. Okay.

25 MS. RICHARDSON: The reason it's paperclipped,

1 Mr. Dunberg, is that the company has a request for
2 confidentiality with the Public Service Commission, and
3 the Commission has yet to issue an order on that as to
4 whether or not it's confidential; so until we get the
5 order we just keep everything that you don't see under
6 wraps.

7 (Thereupon the deposition was recessed briefly and was
8 thereafter resumed, with the agreement of the witness and
9 all parties present)

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15 A. That's basically what I've told you is all I've heard.

16 Q. Have you ever missed an out of service over 24?

17 A. Yes.

18 Q. What action does your manager take when you miss an
19 out of service over 24?

20 A. My manager himself doesn't take any action. If any
21 action is taken-- Against me?

22 Q. Yes.

23 A. No, no action is taken against me.

24 Q. All right. Is any followup action taken with you
25 personally--

1 A. No.

2 Q. -- when you have missed an out of service over 24?

3 A. No.

4 Q. Are you ever asked to explain why you have missed an
5 out of service over 24?

6 A. Occasionally, yes.

7 Q. And the request for explanation, have you ever felt
8 any pressure to not miss another out of service over 24?

9 A. No, I haven't.

10 Q. Do you know what an employee-originated report is?

11 A. Uh-huh.

12 Q. Would you briefly-- That's a "yes"?

13 A. Yes. I'm sorry.

14 Q. That's okay. Would you briefly explain what an
15 employee-originated report is?

16 A. It's a report originated by an employee pertaining to
17 whatever my job consists of as far as repair, cable repair
18 facilities. It could be broken supports on a cable or
19 something that's not quite right with the plant, not
20 necessarily related to out of service.

21 Q. Do you know of anyone who has taken out of service
22 reports that were about to go out over 24 hours and close them,
23 then reopen them as employee-originated reports to complete the
24 repairs?

25 A. No, I don't.

1 Q. Have you heard of that being done?

2 A. Heard of it, yes.

3 Q. What have you heard?

4 A. What the newspapers say, what I read in the
5 newspapers.

6 Q. You have you heard of it being discussed amongst other
7 facility technicians with whom you work?

8 A. Yes.

9 Q. And are these discussions related to this occurring in
10 the North Dade area?

11 A. Not specifically, no.

12 Q. Are they related to discussions of that occurring in
13 the Miami area?

14 A. Yes.

15 Q. In which center?

16 A. Oh, just basically Miami. Well, Miami; I heard
17 Orlando. That's it.

18 Q. And when you've heard these discussions taking place
19 did you form any opinion as to whether or not these were actual
20 events that people knew about?

21 A. No, not really.

22 Q. Do you know of anyone who has used someone else's
23 employee code?

24 A. No, I don't.

25 Q. Has anyone ever used yours?

1 A. Not to my knowledge.

2 Q. Have you ever heard of building a base?

3 A. No.

4 Q. Do you know of anyone who has put false information on
5 a trouble report?

6 A. No, I don't.

7 Q. Do you know of anyone who has improperly handled a
8 trouble report?

9 A. No, I don't.

10 Q. Have you ever been disciplined for your handling of
11 trouble reports in cable repair?

12 A. No.

13 Q. Have you ever had occasion to file a grievance because
14 of instructions you've been given for dealing with repair
15 problems?

16 A. No.

17 Q. Have you ever had occasion to file a grievance for
18 managers doing craft work?

19 A. No.

20 Q. Do you know of anyone who has?

21 A. No, not really.

22 Q. Have you ever been asked to help sell products or
23 services --

24 A. No.

25 Q. -- for the company?

1 A. (Shakes head in the negative)

2 Q. Do you know of any instances of managers attempting to
3 manipulate the out of service over 24-hour results?

4 A. No, I don't.

5 MS. RICHARDSON: Mr. Seiler, I want to thank you for
6 your time. I appreciate your coming.

7 There may be a couple questions--

8 MR. PIERSON: No questions.

9 MS. RICHARDSON: Okay. That's it. Thank you very
10 much.

11 (Thereupon the deposition was recessed briefly, with
12 agreement by the witness and all parties present, and was
13 thereafter resumed)

14 MR. DUNBERG: He needs to clarify an answer.

15 MS. RICHARDSON: That's fine. Just one?

16 MR. BEATTY: Yes. If you don't mind, could I restate
17 the question you posed?

18 MS. RICHARDSON: You may attempt it, and then if
19 I have objections I'll--

20 MR. BEATTY: I'm sure.

21 MS. RICHARDSON: You don't give me too many
22 opportunities, Robert, so I have to take advantage of
23 every single one.

24 MR. BEATTY: I believe the question that you asked
25 was:

1 "Are you aware or do you know of any improper handling
2 of trouble reports?"

3 MS. RICHARDSON: That's close enough.

4 MR. BEATTY: And I believe it's that question to which
5 he would like to offer a modification.

6 A. All I-- just was what I read in the paper. I mean as
7 far as any firsthand knowledge or seeing it or-- that's, you
8 know, basically rumors in the yard and what I read in the
9 paper.

10 MS. RICHARDSON: All right.

11 THE WITNESS: I mean, you know--

12 (Discussion off the record, with the agreement
13 of the witness and all parties present)

14 THE WITNESS: All right. Okay. It was the tornado,
15 we had a tornado.

16 Improper handling you want to talk about. Okay. I
17 forgot all about that, in fact.

18 We had a tornado hit in Hialeah. They gave us X
19 amount of blocks that the tornado had hit, and they said
20 it was all wiped out and if we had any troubles in that
21 area that we were to show it as the tornado code.

22 When this was given to me, I said okay. And then
23 as -- when I went to close out troubles that I had in that
24 area that weren't related I didn't think anything about
25 it, but I showed the tornado code even though they weren't

1 related to that code.

2 Q. (BY MS. RICHARDSON): Did you close out any out of
3 services that weren't related to the tornado to the tornado
4 code?

5 A. Yes.

6 Q. Do you know if that had any impact on the out of
7 service over 24-hour results?

8 A. Back at that time, no, because we were never given the
9 commitments, at that time. Later on we were given commitment
10 times, what the time commitment was.

11 Q. Do you know if the use of that tornado code would
12 exempt that report from counting against the company as a miss
13 on that 24-hour--?

14 A. It could be possible.

15 Q. In relation to the use of certain weather codes like
16 that, do you know of any other misuse of other cause codes?
17 For instance, lightning?

18 A. No. That's based-- just that tornado was the only
19 one.

20 Q. Okay. Let me just ask globally again.

21 Can you recall any other instances then, besides the
22 tornado and whatever else you might have stated earlier--

23 A. No.

24 Q. -- about improper preparation of trouble reports?

25 A. No.

1 MS. RICHARDSON: Okay. That's it.

2 MR. PIERSON: I'd like to clarify something, please.

3 BY MR. PIERSON:

4 Q. With regard to the tornado--

5 A. Um-hum.

6 Q. -- were you specifically told to close all reports,
7 regardless of the cause, to the tornado?

8 A. We weren't told regardless of the cause. We were told
9 close all reports out in the tornado area to the tornado.

10 It could have been that they didn't think that they
11 had individuals that weren't related to it, as far as I know.

12 I'm just speculating, that's all.

13 MR. PIERSON: Thank you.

14 MS. RICHARDSON: I'm sorry.

15 BY MS. RICHARDSON:

16 Q. Do you remember what time frame this was, what year?

17 A. No. It was a while back, it had to be three years,
18 four years ago.

19 Q. The late '80s maybe?

20 A. Yes, the late '80s.

21 MS. RICHARDSON: Okay.

22 MR. BEATTY: Okay.

23 (Thereupon the deposition was concluded at 10:15 a.m.)

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(Date)

John Seiler

Sworn to and subscribed before me this _____ day of

_____, 1993.

Notary Public, State of Florida At Large

My Notary Commission Expires:

1 REPORTERS DEPOSITION CERTIFICATE

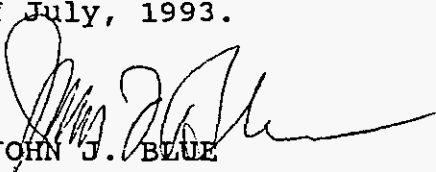
2 WITH ACKNOWLEDGMENT

3 STATE OF FLORIDA)
4 : ss.
5 COUNTY OF DADE)

6 I, JOHN J. BLUE, Registered Professional
7 Reporter, certify that I was authorized to and did
8 stenographically report the foregoing deposition
9 and that the transcript is a true record of the
10 testimony given by the witness.

11 I further certify that I am not a relative,
12 employee, attorney or counsel of any of the parties
13 nor am I a relative or employee of any of the
14 parties' attorney or counsel connected with the
15 action, nor am I financially interested in the action.

16 Dated this 16th day of July, 1993.

17 
18 JOHN J. BLUE

19 Registered Professional Reporter

20 STATE OF FLORIDA

21 COUNTY OF DADE

22 The foregoing certificate was acknowledged
23 before me this 16th day of July, 1993
24 by JOHN J. BLUE, who is personally known to me.

25 
Amar Kredi

Notary Public - State of Florida
My Commission No. CC194782
Expires: May 16, 1996