

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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. )

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DEPOSITION OF: LAWRENCE J. LONG  
TAKEN AT THE INSTANCE OF: Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel  
DATE: Monday, July 27, 1992  
TIME: Commenced at 10:15 a.m. Concluded at 11:25 a.m.  
PLACE: 666 N.W. 79th Avenue Room 642 Miami, Florida  
REPORTED BY: JANE FAUROT Notary Public in and for the State of Florida at Large

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APPEARANCES:

REPRESENTING THE SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:

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REPRESENTING THE FLORIDA PUBLIC SERVICE COMMISSION:

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REPRESENTING LAWRENCE J. LONG:

JORGE L. PEREZ-GURRI, ESQUIRE  
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ALSO PRESENT:

WALTER BAER, Office of Public Counsel.  
CARL VINSON, FPSC Division of Communications.

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I N D E X

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WITNESS:

PAGE NO.

LAWRENCE J. LONG

Direct Examination by Ms. Richardson  
Cross Examination by Mr. Greer

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31

CERTIFICATE OF REPORTER

33



1 attorney.

2 MR. PEREZ-GURRI: Yes, ma'am.

3 MS. RICHARDSON: Okay. I just wanted to get it on  
4 the record. Thank you.

5 MR. ANTHONY: I'M doing this at the beginning of  
6 every deposition, where there's a lawyer, just so you  
7 know the ground rules we are operating under. But we  
8 have got a couple of basic stipulations that everybody  
9 has agreed to.

10 First of all, that the deposition is taken  
11 according to proper notice; that we won't go off the  
12 record without the deponent's consent; that he won't  
13 waive reading and signing; and that we'll save any  
14 objections, except as to the form of the question,  
15 until the time that the transcript might be used at  
16 hearing or whatever.

17 MR. PEREZ-GURRI: That's fine.

18 MR. ANTHONY: There is one other one that I need  
19 to make again, make my same speech, and that is,  
20 Mr. Long, to the extent that any questions might be  
21 directed towards you that ask for information related  
22 to the Company's investigation, which is privileged, of  
23 any matters relating to trouble reporting and the like,  
24 that I am going to instruct you -- I want to warn you  
25 in advance so that you're not surprised -- I'm going to

1           instruct you not to answer the question, because it is  
2           a privileged investigation. It's not subject to  
3           discovery. Therefore, I'm going to ask you not to  
4           answer the question. To the extent that you can answer  
5           any of these questions without reference to that  
6           investigation, what you may have been told, or your  
7           participation, if any, in that, then, of course, you're  
8           free to answer the question. But I just want to make  
9           sure that you understood. It's not a big secret if I  
10          jump in and tell you not to answer a question, that's  
11          why. Somebody looked surprised the last time, that's  
12          why I wanted to make sure.

13                 MS. RICHARDSON: He had forgotten. I'm sure he  
14                 wasn't surprised; he had just forgotten.

15                 MR. ANTHONY: He looked surprised to me.

16                 MS. RICHARDSON: He clearly did.

17                 And I have a couple of directions, also. The use  
18                 of "I don't know," if you, or when you tell me that you  
19                 don't know something, I want to define that on the  
20                 front end, so that we are all clear when you use those  
21                 words. For me, "I don't know," means for the purpose  
22                 of this deposition that you have not only no personal  
23                 direct knowledge, but that you have no secondary source  
24                 knowledge from any source, rumors, innuendo, just being  
25                 around hearing things, whatever. So, "I don't know,"

1 means completely a blank on whatever I ask you. The  
2 same thing for "I don't remember," or "I can't recall."  
3 Not only do you not have a complete full-blown memory,  
4 you don't have scraps of memory floating around when  
5 you tell me you don't remember or don't recall  
6 something. Are we okay on both of those? We're clear?

7 THE WITNESS: Yes.

8 MS. RICHARDSON: Thank you.

9 DIRECT EXAMINATION

10 BY MS. RICHARDSON:

11 Q Would you please state your name and address for  
12 the record, please?

13 A Lawrence J. Long,

14

15 Q Okay. And what is your present position, Mr.  
16 Long?

17 A I'm a systems administrator.

18 Q And what is involved as a systems administrator?

19 A I handle all of the mini-computers and host  
20 computers that interact with the maintenance center.

21 Q When you say you handle them, do you, for  
22 instance, have familiarity with the MTAS system, and do you  
23 do reviews and upgrades on the MTAS system?

24 A I am familiar with MTAS, but, no, I do not do  
25 reviews.

1 Q You don't do reviews. What do you do with MTAS?  
2 M-T-A-S, I'm sorry, Mechanized Trouble Analysis System.

3 A System, that's correct.

4 Q Okay.

5 A MTAS, and my responsibilities now regarding  
6 whether or not the system is available for use.

7 Q Okay. In your reviews of the MTAS system, do you  
8 have any knowledge, or have you gained any experience, with  
9 doing statistical analyses of the trouble reporting process,  
10 looking for abnormal or out-of-the-ordinary events in the  
11 customer trouble reporting process?

12 A Could you rephrase that, because I answered it  
13 before that I don't do any analysis with it.

14 Q With it at all. You're familiar that MTAS holds  
15 the customer trouble reporting data?

16 A Uh-huh.

17 Q Correct?

18 A Correct.

19 Q All right. In looking at MTAS, and maybe I have  
20 missed something. It's been a long morning for me already.  
21 You don't analyze the MTAS data, is that what you're saying?  
22 You don't look at it at all?

23 A Right. My current job, I do not look at it from  
24 that aspect.

25 Q All right. What about prior positions?



1           A       When I was in a staff position for an operations  
2 manager many years ago, I did do analysis at that particular  
3 time.

4           Q       That's what I'm remembering. Okay. Let's go back  
5 to that point in time, then. When you analyzed the MTAS  
6 system, what kind of analysis did you perform?

7           A       I looked at service technician clearing times and  
8 I looked at appointment intervals.

9           Q       All right. Let's take each of those individually,  
10 if you would. Service technician clearing time, do you have  
11 any knowledge, firsthand, secondhand, or otherwise of  
12 service technicians falsifying customer trouble repair  
13 records?

14          A       No direct knowledge.

15          Q       No direct knowledge. Do you have any secondhand  
16 knowledge of that occurring?

17          A       No secondhand knowledge.

18          Q       In your analysis, have you ever seen statistically  
19 through the MTAS analysis that you have done, where it  
20 appears that clearing times have been used to backup or have  
21 been backed up in order to clear a report within 24 hours?

22          A       No.

23          Q       Do you do analyses on clearing out-of-service  
24 trouble reports under 24 hours to see if there are any  
25 aberrations?

1           A     During this time, no.

2           Q     During the time that you were doing the analysis  
3 or at any time?

4           A     Yes.

5           Q     All right. Would you explain and tell me an  
6 approximate time when this occurred?

7           A     When I was a staff person in, I believe, 1986.

8           Q     And would you please explain the surrounding  
9 circumstances, what went on?

10          A     We do that in accordance to normal business  
11 procedures. We run MTAS reports to make sure that we are  
12 falling within regular business guidelines. It was just a  
13 normal part of the procedures in doing reviews.

14          Q     And on this particular instance, then, you found  
15 that they were not following normal guidelines?

16          A     No. They were.

17          Q     They were following normal guidelines?

18          A     Yes.

19          Q     Have you ever found an instance when they were  
20 not?

21          A     No, not that I ever can remember, no.

22          Q     Okay. How do you go about checking to see? What  
23 do you pull statistically off MTAS to determine whether  
24 anyone has been backing up clearing times?

25          A     My task during that period of time was not to look

1 at that particular item. What we were concerned with was  
2 the technician clearing time for tasks.

3 Q T-A-S-K, task?

4 A Right, a task.

5 Q And I am not familiar with that one. Could you  
6 explain to me what that is?

7 A A task is a work item to be performed.

8 Q So, if the Company says average normal time for  
9 clearing is five minutes, it should be done within five  
10 minutes or 30 seconds, it ought to be done within 30  
11 seconds; and you determine whether or not the maintenance  
12 administrator did, in fact, clear that report within 30  
13 seconds? Is that what you're talking about?

14 A No.

15 Q Can you put it in layman's terms for me?

16 A What you're referencing is the time and motion  
17 study.

18 Q Okay. Would you explain, so that I can  
19 understand?

20 A A clearing time would be all of the time and  
21 motion studies put together. So, that if I was to do a time  
22 and motion study on a technician, and as you just said, so  
23 many minutes to do this particular item, so many minutes to  
24 do that particular item to the end, and added them up, that  
25 would be total task clearance.

- 1 Q Okay. Well, who is your immediate supervisor?
- 2 A April Ivy.
- 3 Q And who is her supervisor?
- 4 A Ted Rubin.
- 5 Q Is that R-U-B-I-N?
- 6 A R-U-B-I-N.
- 7 Q Okay. And what was your prior position with the  
8 Company, prior to this?
- 9 A Prior to which position?
- 10 Q The present position that you --
- 11 A I was an assistant -- well, I wasn't an assistant  
12 to the administrator. I was an assistant manager for staff,  
13 which we were just talking about.
- 14 Q Okay. And as assistant manager for staff, what  
15 were your primary duties?
- 16 A To assist the operations manager in performing his  
17 day-to-day duties, you know, a staff assistant.
- 18 Q In an IMC?
- 19 A No.
- 20 Q Where would this be?
- 21 A In the division office.
- 22 Q In the division office. So those duties had  
23 oversight for all of Miami, or --
- 24 A Just one division.
- 25 Q And that was?

1 A At the time would be South Dade.

2 Q South Dade?

3 A Uh-huh.

4 Q And from when to when were you in this particular  
5 position?

6 A From '86 to approximately '88, I believe that's  
7 it.

8 Q Okay. And then since '88 you have been in your  
9 present position?

10 A That's correct.

11 Q That's correct. And how did you begin with the  
12 Company? What was your entry level position?

13 A I was a services technician.

14 Q So, then, it's fair to say that you had daily  
15 responsibility for handling trouble reports on site, on  
16 customer premises or wherever, if it was a cable problem, if  
17 you were in cable repair, or actual on-site responsibility  
18 for clearing a trouble?

19 A No.

20 Q No.

21 A Okay. My job on an entry level was --  
22 clarification on title. Today it's services technicians,  
23 and 20 years ago it was installer/repairman, and I was an  
24 installer.

25 Q So, you put in new service?

1           A     New service only.

2           Q     At any time did you deal with customer repairs as  
3 a service tech, or someone who was sort of, what I consider  
4 frontline, actually talking to the customer and actually  
5 working on the problem?

6           A     No.

7           Q     No. In your systems administrative experience,  
8 you deal not only with MTAS, but what other company  
9 programs?

10          A     LMOS, CRAS (phonetic), TIRKS, PEGUS.

11                   THE REPORTER: TIRKS?

12                   THE WITNESS: TIRKS, T-I-R-K-S.

13          Q     And that stands for?

14          A     That's trouble entry reports circuit system, I  
15 believe is the acronym for that.

16          Q     And PEGUS?

17          A     Also has to do with circuits. I don't know what  
18 the acronym exactly stands for, but it has to do with  
19 trouble reporting for circuits.

20                   THE REPORTER: And what is the acronym, please,  
21 sir?

22                   THE WITNESS: PEGUSS. It's P-E-G-U-S.

23          A     (Continuing) I also interface with a system  
24 called PREDICTOR, which has to do with the central office.  
25 What we get is a report of services in the office. RMAS,

1 which is another system for central offices that -- actual  
2 termination into the switch, so that we can modify  
3 translations for customer records, as far as services  
4 rendered. RADS, R-A-D-S, is a system that's used for  
5 tracking special services. SBDN, Southern Bell local  
6 network, that is a connection point between this system and  
7 many others. Ethernet, which goes between minicomputer to  
8 minicomputer. COLAN, central office local area network. I  
9 could keep going forever.

10 Q That's enough, unless there are any others that  
11 deal with customer trouble reporting and repair and rebate?

12 A No.

13 Q Do you deal at all with MOOSA, M-O-O-S-A?

14 A No.

15 Q Okay. Do you have any personal or secondhand, or  
16 any information at all, on individuals backing up repair  
17 times to meet the out-of-service-over-24-hours index?

18 A No.

19 Q Do you have any information about MAs having to  
20 call a back room to close out trouble reports, to call a  
21 manager to get permission on clearing times?

22 A No.

23 Q Okay. Were you ever involved in an operational  
24 review for an IMC?

25 A Several.

1 Q Okay. Was that part of your duties and at what  
2 point? Is it still and was it in the past? And can you  
3 give me an idea of how long you have been doing this?

4 A I don't do it currently. As far as my particular  
5 part was, all I did was supply reports to individuals that  
6 were doing the review.

7 Q Okay. I don't quite follow you. You supply  
8 reports to individuals doing the review.

9 A During the time that I was assistant manager in  
10 1986, as we were talking about before. In other words, they  
11 would do a review and then they would request MTAS reports.  
12 And they were their reports, not my reports. And all I  
13 would do is the input. And then the output, I handed it to  
14 them.

15 Q All right. So if I understand what you're saying,  
16 then, when one of the -- I going to call them an auditor, or  
17 when someone goes in to look at an area to see whether  
18 things are performing correctly, employees are performing  
19 correctly, they would call you to generate an MTAS report  
20 on, say, test okays or carryover nos or CPE codes, whatever  
21 they wanted to look at to see if the operation was being  
22 performed correctly. You would simply do the programming in  
23 MTAS to pull off the specific data that they wanted, and  
24 then pass that report over to them. Is that what you're  
25 saying?



1           A     No. It's just a request. You're saying that I am  
2 programming. I do not do the programming on that. It's  
3 already done by that individual. It's simply an input  
4 request.

5           Q     So, the individual would tell you, then, "In MTAS  
6 I need Category 6. I want CPE code. I want," et cetera, et  
7 cetera, and you would simply type it in the machine?

8           A     No. To clarify it for you, MTAS --

9           Q     Please.

10          A     -- is built of what are called, in layman's terms,  
11 "canned reports," preprogrammed, in the data base, already  
12 there.

13          Q     So, I want an 86 report?

14          A     Right. And you just type in Report 86 --

15          Q     And the criteria?

16          A     -- the criteria is already built.

17          Q     Okay.

18          A     You can't even look at it.

19          Q     All right.

20          A     And you type that in, you have permission. And  
21 the reason why they would come to me is I have permission to  
22 use the data base, and you have a certain number of reports  
23 you can pull. You are limited to a specific time frame.  
24 All right. And my pass code has so many to get. So, they  
25 would say, "I need this report, and I need maybe nine other

1 reports," which would limit my ten. And if they needed 20  
2 reports, then they would use their ten and my ten, and that  
3 is the reason why I was involved in it.

4 Q Okay. So, these individuals had access to MTAS,  
5 but because of the security level, they were limited on the  
6 number of reports they could get, in which case at that  
7 point they had to go to you?

8 A That's correct.

9 Q All right. And then these reports were used to do  
10 analysis of?

11 A By them.

12 Q By them. And were you ever a party to seeing the  
13 results, the reviews, the analysis you brought in in any  
14 other respect?

15 A The results would be at the end of the review they  
16 would say, "Okay, the center passed." If that's what you're  
17 calling the results, then, yes.

18 Q Okay. Do you recall any instances where the  
19 centers failed?

20 A No, not to my knowledge, no.

21 Q Do you recall any problems at all that may have  
22 come up on these reports that were done?

23 A No.

24 Q Were you in place and doing this at the time the  
25 August 1990 Dade review was done? Were you involved in that

1 one in any way?

2 A No, I was not involved in it, other than the fact  
3 that I was there.

4 Q Are you familiar at all that it was done and what  
5 the results were?

6 A Yes, I was present.

7 MR. ANTHONY: I just want to make sure for the  
8 record that we're talking about the North Dade review.

9 MR. RICHARDSON: Okay. That's fine.

10 MR. ANTHONY: I'm asking the question is that the  
11 one we're referring to?

12 MS. RICHARDSON: I believe it is the North Dade.

13 THE WITNESS: Then the answer is no.

14 MS. RICHARDSON: Then the answer is no.

15 BY MS. RICHARDSON:

16 Q But you were there at the time?

17 A No. If it was North Dade, no.

18 Q Okay. But there was one done in South Dade?

19 A They are done in every division.

20 Q In every division. Are you familiar at all with  
21 anyone using the no access code to stop the clock --

22 A No.

23 Q -- on a trouble report? Are you familiar at all  
24 with anyone using the CON, carryover no, code to stop the  
25 clock?

1           A     To stop the clock?

2           Q     Uh-huh.

3           A     No.

4           Q     Are you familiar with anyone in the Company  
5 closing out reports before they go out-of-service over 24  
6 hours and then reopening reports?

7           A     No.

8           Q     Has any analysis been done on any of these items  
9 through MTAS or through your function?

10          A     No.

11          Q     Are you familiar with anyone statusing affecting  
12 service reports as out-of-service in order to build the  
13 base?

14          A     No.

15          Q     Are you familiar with anyone statusing an  
16 out-of-service report as affecting service or leaving it  
17 statused as an affecting service in order to avoid going  
18 over the 95 percent repair rule index?

19          A     No.

20          Q     In your duties that relate to LMOS, would you be  
21 -- let me rephrase that. In terms of LMOS, what are your  
22 duties?

23          A     To assure that the host system stays up on the  
24 minicomputers.

25          Q     Is that the front end or the back end?

1 A Both.

2 Q Both, you deal with both sides?

3 A (Witness indicating yes.)

4 Q Okay. And the system stays up. Does that just  
5 mean you make sure that there is enough electricity in the  
6 building that the computer doesn't go down on us?

7 A No. The details of a host system being up is a  
8 host system interfaces over a data line via a circuit into a  
9 data set. The data set then interfaces into the back of a  
10 minicomputer on a bi-sync, bi-synchronous line, and has many  
11 accesses so that more than one person can access the system  
12 at one particular time. And that is my duty, to ensure that  
13 that stays up so that we can handle trouble reports.

14 Q You were involved with the security code aspect of  
15 LMOS, weren't you, in terms of who could get on and who had  
16 access to that system?

17 A Security code in what date frame are we talking?

18 Q Any date frame, at anytime that you have been  
19 employed with BellSouth?

20 A Security code in LMOS has -- just within the last  
21 eight months we have a common user ID code for LMOS. I  
22 believe that's the time frame.

23 Q All right. A common user ID code?

24 A Correct.

25 Q How many people get this code?

1           A     Every individual now gets one, and it is driven  
2 off of their social security number.

3           Q     How was it handled before? How did people get  
4 access? Did they just type on or what?

5           A     What time frame, again?

6           Q     Well, let's go back. Let's make it even more  
7 clear, Mr. Long. When did this new system go into place?

8           A     Like I said, approximately eight months ago. I  
9 could be off.

10          Q     Around the first of January '92, is that when  
11 we're talking about?

12          A     Somewhere in that time frame, yes.

13          Q     Okay. Before January of '92, how was security  
14 handled for the LMOS system and employee access?

15          A     Can you give me -- I hate to be picky. Can you  
16 give me a time frame?

17          Q     Well, let's pick 1991, then. If the whole year is  
18 too much, then shorten it to whatever immediately --

19          A     Because business has changed, you must understand.

20          Q     Okay. Whatever immediately --

21          A     1991 we had a convergent system, which is a  
22 minicomputer.

23          Q     Okay.

24          A     All right. In my particular center, I have four  
25 such systems, each one comprised of 13 megs of memory, so

1 that we can handle certain groups of people. And each one  
2 of those systems has a security password for each  
3 individual, along with a log-in. And those systems are only  
4 accessible -- if I gave you your log-in and password, you  
5 pick your own password, and I give you a log-in, and you can  
6 use that particular one. Once you get to that particular  
7 point of logging in, the system will give you a menu of  
8 different systems that I just spoke to you in reference to,  
9 and you select -- in this case you're asking me about LMOS  
10 -- LMOS. And in 1991 you would select LMOS, and it would  
11 give you a line.

12 Q All right. And when you say "log-in," was it  
13 logged in by employee code?

14 A No.

15 Q Were these numbers individual -- individual  
16 numbers for each individual employee?

17 A Yes.

18 Q So, your particular number would be different  
19 from, if Mr. Anthony had access, his number?

20 A That's correct.

21 Q Were these numbers generally available or were  
22 they confidential and protected? How was that done?

23 A Each employee was given a number within the  
24 bureau. As far as confidential, if I told you your number  
25 and you shared it with somebody, confidentiality was then

1 breached.

2 Q Were they intended to be confidential within the  
3 Company or just with outside parties?

4 A They were intended as an identifier.

5 Q Okay. So, it was not necessarily a security code;  
6 it was just an access code?

7 A It was an identifier.

8 Q Thank you. Okay. Well, try to keep me exactly  
9 accurate on these things.

10 Then in January of '92 the system changed, and the  
11 identifier became a security code?

12 A In January of '92, the system did a generic  
13 update, and it was added, a common user ID. And each common  
14 user ID is specific to the employee.

15 Q And it's based on a social security number?

16 A That's correct.

17 Q Okay. And is that intended as a security code on  
18 access to the system, or is it just --

19 A It's intended as a security code.

20 Q On the system. And why did the Company then feel  
21 that it could go from just a common identifier or that it  
22 needed to go from just a common identifier to a code that  
23 was a security code on access to the system?

24 A I don't know why the Company would do that.  
25 You're asking me my opinion?



1 Q In your opinion?

2 A I have no idea.

3 Q Okay. Did you see any documents, memoranda,  
4 written information regarding any purpose for this being  
5 done?

6 A Yes.

7 Q Can you identify those documents, please, and who  
8 wrote those documents and if they were addressed to you?

9 A It was not a document as you say. What it is, is  
10 it's to make the employee easier to use the different  
11 systems. In other words, at this particular point we have  
12 many systems, as I've described. And we have many log-ins  
13 on many systems. They might vary from system to system. I  
14 might have my own personal. I might have several different  
15 log-in names or IDs, and to make it easier for employees,  
16 all right, they reduced it to one, what we call a common  
17 user ID that will be distributed into all the different  
18 systems.

19 Q Okay. But you don't recall any specific document,  
20 then?

21 A No.

22 Q Okay. Are you familiar with any employee using  
23 exclude codes to prevent a report being counted against the  
24 out-of-service index?

25 A No.

1 Q Are you familiar with any means of any employee  
2 falsifying a Company report in order to meet the 95 percent  
3 index?

4 A No.

5 Q Are you familiar with excluding reports?

6 A With the function?

7 Q Yes.

8 A Yes.

9 Q Are you familiar with anyone using the exclude  
10 function to prevent an out-of-service report over 24 hours  
11 being counted against the index?

12 A No.

13 Q At one point with BellSouth you were handling or  
14 dealing with the sales area, were you not? The "Go for the  
15 Gold," and the Florida --

16 A My dealings with "Go for the Gold," was I was in a  
17 staff position, and they started the program, and I designed  
18 a report for that particular program.

19 Q And what was the report?

20 A It just showed the number of sales given by an  
21 individual for a certain period of time, a month.

22 Q Okay. And based upon sales, employees were given  
23 bonus pay, weren't they?

24 A That's correct.

25 Q How much bonus pay did you receive from your

1 participation?

2 A None.

3 Q You received none?

4 A None.

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11 Q Who was that, please?

12 A Ted Rubin.

13 Q Ted Rubin. Did you meet with anyone else? Was  
14 anyone else present?

15 A Hilda Geer.

16 Q Hilda Geer, G-E-E-R?

17 A Yes, that's correct.

18 Q And what was the gist of that meeting?

19 A I was advised that they were informed to meet with  
20 me because I am systems administrator, and also can be  
21 second in command for the center; that if I see or hear of  
22 any improprieties take place, to make sure that I bring them  
23 to management's attention up line, so that, you know, those  
24 particular things could be handled.

25 Q Did you receive a reprimand --

1           A     No.

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11           A     Not to my knowledge.

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14           A     Yes.

15           Q     Would you please tell us who?

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20           Q     Do you know why they were disciplined?

21           A     No.

22           Q     Are you familiar with the Special Study Code 222?

23           A     I know of it, yes.

24           Q     Do you know what its purpose was?

25           A     It was to identify customers that were notified

1 for appointments.

2 Q And why did the Company use this, or where was it  
3 used, first?

4 A In a special identifier field, so that we could  
5 identify that we were notifying customers that we might not  
6 meet their appointments.

7 Q What year?

8 A Back when I was staff.

9 Q When you were staff, so in the '86 time frame, and  
10 this is still in the Dade, South Dade, North Dade?

11 A Yes, South Dade.

12 Q South Dade area?

13 A Right.

14 Q Was the 222 used as a means of keeping track of,  
15 then, the number of commitment times that had been exceeded  
16 by the Company on out-of-service reports?

17 A As far as out-of-service reports, I don't have any  
18 knowledge of that. I just know it's for missed commitments.

19 Q Okay. Was the 222 code used instead of closing a  
20 report out? They just put 222 on close out and held the  
21 report open, then, so that they could somehow --

22 A Identify who had been notified, and that we were  
23 going to miss the appointment with the subscriber, that was  
24 the intent.

25 Q And this information, then, was available to the

1 service techs in the field, or to whom? I mean, who was  
2 going to be using this?

3 A The maintenance administrators.

4 Q Maintenance administrators?

5 A That's correct.

6 Q Is it, then, sort of a flag to an MA that we have  
7 got a commitment that's in danger of being missed and that  
8 maybe it needed to be handled?

9 A Yes.

10 Q All right. So, the Company -- are you familiar  
11 with anyone, then, using this 222 flag in order to  
12 improperly close out or to falsify the report, so that it  
13 would not show a missed commitment improperly? I'm sorry,  
14 so that we could miss the commitment without it being  
15 counted on the repair index against the Company.

16 A Can you repeat that, because you said it like two  
17 different ways?

18 Q Yes. I was thinking the question through as I was  
19 giving it to you, and that is why it is unclear. Let me see  
20 if I can phrase it better.

21 Are you familiar with anyone using the 222 code as  
22 a flag, a red flag, on out-of-service reports so that they  
23 would be able, then, to falsify that report or close it out  
24 early without it actually having been cleared in order to  
25 meet the repair index?

1 A No.

2 Q Do you have any information that anyone has  
3 misused that 222 code in order to meet a repair index?

4 A No.

5 Q Did you ever see a Mr. McHale closing out a report  
6 improperly?

7 A No.

8 MS. RICHARDSON: Do you have any questions?

9 MR. GREER: Yes, I have a few.

10 CROSS EXAMINATION

11 BY MR. GREER:

12 Q Mr. Long, do you know the original purpose for the  
13 CON status code?

14 A The original purpose, no, sir.

15 Q Could you describe to me what PEGUS is?

16 A My dealings with the system is only that the data  
17 line stays up. I have no direct access into the system  
18 itself. It's used for special circuits, as far as my  
19 knowledge is.

20 Q As far as the security log-in that went in place,  
21 I believe you said '92, January '92?

22 A Uh-huh.

23 Q Who made the decision to add that to LMOS? Was  
24 that a corporate decision?

25 A I would imagine.

1 Q So, you don't know who directed them to do that?

2 A No, sir, I do not.

3 Q Do you know if that was statewide?

4 A As far as I know, yes, sir.

5 MR. GREER: That's all I have.

6 MR. ANTHONY: I don't have any questions. Thank  
7 you Mr. Long.

8 THE WITNESS: Thank you.

9 (The deposition concluded at 11:25 a.m.)

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CERTIFICATE OF ADMINISTERING OATH

STATE OF FLORIDA:  
COUNTY OF LEON:

I, JANE FAUROT, Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that on the date and place indicated on the title page of this transcript, an oath was duly administered by me to the designated witness(s) before testimony was taken.

DATED THIS 27th day of September, 1993.



JANE FAUROT  
MY COMMISSION # CC295576 EXPIRES  
July 16, 1997  
BONDED THRU TROY FAIR INSURANCE, INC.

*Jane Faurot*

JANE FAUROT  
100 Salem Court  
Tallahassee, Florida 32301  
(904) 878-2221

MY COMMISSION EXPIRES: 7/16/97

CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF LEON )

I, JANE FAUROT, Court Reporter, do hereby certify that the foregoing proceedings was taken before me at the time and place therein designated; that my shorthand notes were thereafter translated under my supervision; and the foregoing pages numbered 1 through 32 are a true and correct record of the proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

DATED THIS 27th day of September, 1993.

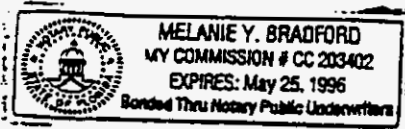
*Jane Faurot*

JANE FAUROT  
100 Salem Court  
Tallahassee, Florida 32301  
(904) 878-2221

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS 28 day of September, 1993, IN THE CITY OF TALLAHASSEE, COUNTY OF LEON,

1 STATE OF FLORIDA, BY THE ABOVE PERSON WHO IS PERSONALLY  
2 KNOWN BY ME.

3 *Melanie Bradford*  
4 NOTARY PUBLIC  
5 STATE OF FLORIDA



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