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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.)

DOCKET NO. 910163-TL

~~9100300-72~~

COPY

DEPOSITION OF: CHRISTINA HANEY
TAKEN AT THE INSTANCE OF: Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel
DATE: Tuesday, July 28, 1992
TIME: Commenced at 2:40 p.m. Concluded at 3:10 p.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

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

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RECORDS/REPORTING

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APPEARANCES:

REPRESENTING THE SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:

ROBERT G. BEATTY, ESQUIRE and
PHILLIP CARVER, ESQUIRE
Southern Bell Telephone and Telegraph Company
Museum Tower Building
Suite 1910, 150 West Flagler Street
Miami, Florida 33130

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

SUE RICHARDSON, ESQUIRE
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

REPRESENTING THE FLORIDA PUBLIC SERVICE COMMISSION:

JEAN WILSON, ESQUIRE and
STAN GREER, Class B Practitioner
FPSC Division of Legal Services
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0863

REPRESENTING CHRISTINA HANEY:

ROBERT N. SCOLA, JR, ESQUIRE
Quinon, Strafer & Scola, P.A.
2400 South Dixie Highway
Second Floor
Miami, Florida 33133

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.

CHRISTINA HANEY

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

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CERTIFICATE OF REPORTER

31

STIPULATIONS

1
 2 The following deposition of CHRISTINA HANEY was
 3 taken on oral examination, pursuant to notice, for purposes
 4 of discovery, for use in evidence, and for such other uses
 5 and purposes as may be permitted by the Florida Rules of
 6 Civil Procedure and other applicable law. Reading and
 7 signing of said deposition by the witness is not waived.
 8 All objections, except as to the form of the question, are
 9 reserved until final hearing in this cause; and notice of
 10 filing is waived.

11 * * * * *

12 Thereupon,

13 CHRISTINA HANEY

14 was called as a witness, having been first duly sworn, was
 15 examined and testified as follows:

16 MS. RICHARDSON: Mr. Beatty, did you want to make
 17 some opening remarks?

18 MR. BEATTY: Sure. My name is Robert Beatty, and
 19 I'm here representing Southern Bell. Phillip Carver,
 20 also present, is representing Southern Bell, as well.

21 There are some stipulations that the parties have
 22 agreed to, and let me just for the sake of the record
 23 reiterate them.

24 Number one, that the deposition is taken pursuant
 25 to proper notice, initiated by Public Counsel; that in

1 the event that anyone wants to go off the record, it
2 will be with your agreement and your counsel's
3 agreement; that we will save all objections, except as
4 to form; and the reading and signing of the deposition
5 will not be waived.

6 Let me further state that as you, I'm sure, are
7 aware, at some point in the past the Southern Bell
8 Legal Department and Security Department conducted an
9 internal investigation, and that investigation was
10 taken pursuant to the attorney/client privilege and the
11 attorney work product privilege, both of which are
12 afforded to the Company and belong to the Company. In
13 an effort to maintain those privileges, I'd appreciate
14 it if today in the context of this deposition you would
15 not disclose anything that you may have learned or
16 heard about that relates to the conduct of that
17 investigation. Okay?

18 MS. RICHARDSON: But if you have any information
19 outside of that investigation, we hope and expect you
20 to answer fully and honestly.

21 THE WITNESS: Correct.

22 MS. RICHARDSON: All right. And, Mr. Scola, do
23 you want to put in an appearance on behalf of your
24 client?

25 MR. SCOLA: I'm Robert Scola on behalf of Tina

1 Haney.

2 MS. RICHARDSON: Ms. Haney, I only have a couple
3 of preliminary statements and matters I'd like to get
4 clear before we start.

5 The first one is the use of "I don't know," as a
6 response. If you tell me you don't know something or I
7 ask you, "Do you know," and you say, "No," in response
8 to that, "I don't know," means that you have no
9 personal knowledge, firsthand, direct, but you also
10 have not heard anything, hearsay, outside sources,
11 newspaper information, something like that. If you
12 have outside source information, then you know
13 something. Okay. Is that acceptable?

14 THE WITNESS: Yes.

15 MS. RICHARDSON: Okay. And it's pretty much the
16 same thing for "I can't remember" or "I don't recall."
17 If you say, "I can't remember," or "I don't recall,"
18 there's nothing. You draw an absolute blank. There
19 are no little fragments of niggling memory out here.
20 If there are, then just clarify your statement with,
21 "Well, there's something out here. I think it's about
22 this, maybe," you know, but don't tell me you don't
23 know or "I don't remember." Okay?

24 THE WITNESS: Okay.

25 MS. RICHARDSON: All right.

1 MR. SCOLA: Unless you don't remember or you don't
2 know.

3 MS. RICHARDSON: Well, if you have an absolute
4 blank, then "I don't remember," that's perfectly
5 acceptable. Okay?

6 THE WITNESS: Okay.

7 MS. RICHARDSON: Okay. The last thing is, Ms.
8 Haney, I will ask you, "Do you know of any employees
9 who may have done this." And when I say, "Do you know
10 of any employee," I expect you to speak for yourself,
11 as well as other employees, include yourself in that
12 sort of general, any one group. Is that acceptable?

13 THE WITNESS: Sure.

14 DIRECT EXAMINATION

15 BY MS. RICHARDSON:

16 Q Okay. With those things out of the way, then,
17 would you please state your name for the record and spell
18 both your first name and your last name for the court
19 reporter?

20 A Okay. Christina, the last name is Haney,
21 H-A-N-E-Y.

22 Q Thank you. And your address, please?

23 A Do you want
24 the zip code?

25 Q (Indicating yes.)

1 A

2 Q Okay. And what is your present position with the
3 Company, Ms. Haney?

4 A Assistant manager, IMC South Dade.

5 Q And how long have you held that position?

6 A In South Dade, since September of '90.

7 Q Okay. And what pay grade level is that?

8 A Three.

9 Q Three. And who is your present supervisor?

10 A April Ivy.

11 Q And who is her present supervisor?

12 A Ted Rubin.

13 Q And that's R-U-B-I-N?

14 A Yes.

15 Q Okay. And what position did you hold immediately
16 prior to that?

17 A Assistant manager, IMC Central. It's a different
18 location.

19 Q All right. And what pay grade level was that?

20 A Three.

21 Q And why did you move from Central to South Dade?

22 A The Company thought there was a need for me to be
23 in South Dade. I'm supposing there was a shortage of
24 managers in South Dade. So, I transferred on a surplus from
25 Central.

1 Q Okay. That clears it up because. Otherwise, I
2 would have assumed that they would have had to replace you
3 there, too.

4 A Okay.

5 Q What was your entry position with the Company?
6 What did you do when you first started?

7 A Typist. Well, let me clarify that. I originally
8 started as an overseas mobile marine operator. And I took a
9 leave of absence for six and a half years, and I came back
10 as a typist.

11 Q Okay.

12 A So there were two entries.

13 Q As a typist in Miami?

14 A Yes.

15 Q And what year was that?

16 A '79.

17 Q Okay. In your duties and responsibilities in the
18 IMC, do you have responsibility for any part of the customer
19 trouble reporting process?

20 A Could you clarify?

21 Q Handling customer trouble reports when a customer
22 calls in and says, "My phone is out of service."

23 A Yes.

24 Q Any part of that process from beginning of the
25 report, to handling it, to clearing it and closing it?

1 A Yes, I do.

2 Q Okay. And can you tell me do you have
3 responsibilities for all of that or just little pieces of
4 it?

5 A Pieces of it.

6 Q Of the customer reporting process, are you just on
7 the front end of it or just in the middle of actually
8 getting it cleared out, sending someone out, dispatching an
9 ST to it? Kind of explain what your process is, what part
10 your process is in the process.

11 A Okay. It could be both. It could be in the
12 beginning or the end, so I have both opportunities.

13 Q Okay.

14 A If a customer tells a technician that their phone
15 is out-of-service, the technician may call the maintenance
16 center, and we would enter the report. So that would be an
17 indication of when it would be at the beginning of the
18 report. So, I may be involved at that point. The other one
19 is if the customer calls the CRSAB through the normal
20 process, and then at some point in time I have to get
21 involved with the trouble report. There's that possibility.

22 Q Okay. And if you have to get involved with the
23 trouble report at that point in time, what would the nature
24 of your involvement be?

25 A It would depend on the circumstances. I couldn't

1 specifically say.

2 Q Okay. Do you have any responsibility for clearing
3 trouble reports?

4 A Not myself, personally. The office that I work
5 in, the maintenance administrators do, yes.

6 Q Okay. And do you supervise those people on
7 clearing trouble reports?

8 A No. I have none that report to me. Let me
9 clarify that.

10 Q Okay. Have you had at any time --

11 A No.

12 Q -- in your experience in Southern Bell, had
13 responsibility for clearing trouble reports or supervising
14 individuals with responsibility for clearing trouble
15 reports?

16 A Yes. I supervised maintenance administrators when
17 I went to South Dade. And that was from September of '90
18 until May of '91. That was about an eight-month span that I
19 supervised MAs in the new capacity as screening foreman.

20 Q Screening foreman? Who was the screening foreman
21 before you in South Dade?

22 A I don't recall her name. There were several. One
23 isn't with the Company anymore. I don't -- they didn't
24 specifically say who I was replacing. And there are other
25 screening foremen in South Dade. There are currently three.

1 So, who I specifically replaced, I don't know.

2 Q But you know that someone did leave the Company?

3 A Yes.

4 Q And who was that?

5 A I don't recall her name.

6 Q Okay. Do you know if she was terminated?

7 A I don't recall. I know one person died of cancer.
8 The other one, I don't know what the specifics were. I just
9 knew they were short a screening foreman. That's why I was
10 being asked to go down there.

11 Q And what's the function of a screening foreman?

12 A They oversee the maintenance administrators in the
13 office. They normally have them reporting to them. They
14 check reports to make sure everything is being processed in
15 a timely manner.

16 Q Are those like jeopardy reports, you mean, or just
17 the individual customer trouble report?

18 A Well, a jeopardy is still a customer trouble
19 report. They will put up what's called a screening
20 jeopardy, and it will tell you the items that are in screen,
21 how many we have.

22 Q Okay. I don't want to cut you off, but is that
23 the extent of your --

24 A Well, there's a large job description, what
25 entails a screening foreman. I don't recall everything that

1 is involved in it, but that is their primary function, to
2 oversee the maintenance administrators and make sure that
3 the items that have to be handled by the MAs are handled
4 correctly and in a timely manner.

5 Q Is this part of the flow-through, the management
6 flow-through process?

7 A I don't understand your question.

8 Q You don't understand the terms. Okay. Do you
9 have any knowledge, firsthand or secondhand, of an
10 operational review that was conducted in August of 1990 in
11 South Dade?

12 A Yes.

13 Q And what is that knowledge? Explain to me what
14 you know about it.

15 A Well, once a year usually staff will do a review
16 on the maintenance centers. Usually it's what they call a
17 full-blown review, and the results are published, whether
18 they passed, failed, where the breakdown is, what modules
19 you don't pass, and what is recommended to correct a
20 deviation that you might have. And August of '90 was just
21 before -- it was the review before I went to South Dade.

22 Q And was that the extent of your knowledge, or do
23 you know something else about that particular review?

24 A Specifically?

25 Q Uh-huh.

1 A I mean, I could go on and on for hours about the
2 review. I mean, I know there are different modules.

3 Q About that particular review, the August 1990
4 review.

5 A To me, it's no different than any other review.
6 They look at certain modules. There's a lot about a review.
7 If you're asking me specifically --

8 Q All right. Let me ask you this, then. Do you
9 know of any problems with that review, any problems that
10 were uncovered in that review?

11 A To my knowledge, South Dade did not pass the
12 standardization review. Had not passed one. So, since it
13 was August before I got there, I'm going to say that they
14 did not pass it, the standardization portion of that review.
15 The rest of the review, I don't recall. I mean, it was
16 before I got there.

17 Q Okay. Have you ever been involved in any Company
18 audits of the customer trouble repair process?

19 A No.
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1 Q Uh-huh.

2 A I can tell you in general what I can recall. I
3 don't remember the words.

4 Q That's fine.

5

6

7

8 A March 10th, 1992.

9

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15 Q Sat down with you personally --

16 A Yes.

17 Q -- and told you about it?

18 A Yes.

19 Q And what did they tell you?

20

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23

24 Q Okay.

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MR. SCOLA: I would object to that on the basis
that it calls for speculation.

5

6

BY MS. RICHARDSON:

7

Q Go ahead. You can answer the question now that he
has the objection down on record.

8

9

A I'd rather not answer.

10

MS. RICHARDSON: Mr. Scola.

11

MR. SCOLA: Yes?

12

MS. RICHARDSON: Are you directing your client not
to answer that question on the basis that the question
calls for speculation?

13

14

15

MR. SCOLA: Yes.

16

BY MS. RICHARDSON:

17

Q And, Ms. Haney, you are -- this is for the record,
okay? You are refusing to answer that question because it
calls for speculation, because your attorney has directed
you not to do so. Is that correct?

18

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A I'm refusing to answer on speculation, right.

22

Q Okay. Based upon your attorney's objection?

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Q And did you have that meeting?

A No.

Q Do you know why you didn't have the meeting?

A No.

Q So, it wasn't because of something with you, some reason -- your reason, like illness or something on your part that prevented the meeting? It was just that

Is that correct?

(Simultaneous conversation.)

1 MR. BEATTY: I object to the form of the question.

2 BY MS. RICHARDSON:

3 Q Okay. Have you had any response at all from
4 Mr. Sanders?

5

6

7

8 matter.

9

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21 MR. SCOLA: I would object on the basis that it
22 calls for speculation, and also that speculation would
23 be based upon conversations that she and I have had,
24 which will be covered by the attorney/client privilege.
25 And I don't believe she can answer that without

1 including the nature of those discussions. And I will
2 instruct her not to answer the question.

3 MS. RICHARDSON: Okay.

4 BY MS. RICHARDSON:

5 Q And then would you make some response about
6 answering or not answering the question, please?

7 A I refuse to answer the question.

8 Q Based upon your attorney's objection on
9 attorney/client privilege?

10 A Correct.

11

12

13 A Yes.

14 Q And will you please tell me who they are?

15

16 of my knowledge. He is one of the assistant managers in the

17

18 Q Okay. And did they share with you the nature of
19 their discipline?

20 A No.

21 Q Then how did you hear that they were disciplined,
22 or how do you know that they were discipline?

23 A They told me they were.

24 Q They told you that they were disciplined, but they
25 didn't tell why they were disciplined?

1 A No, they said they had an entry, and that was the
2 extent of the conversation.

3 Q Okay.

4 A We were all called across the street in reference
5 to the same time frame. So, it was kind of obvious we were
6 all going over there. So --

7 Q All right. Has anyone ever accused you of
8 improperly handling a customer trouble report?

9 A No.

10 Q Has anyone ever accused you of falsifying a
11 customer trouble report?

12 A No.

13 Q Do you know of any employee who has falsified a
14 customer trouble report?

15 A No.

16 Q Have you ever, yourself, falsified a customer
17 trouble report?

18 A No.

19 Q Do you know of any employee who has backed up the
20 time on a customer trouble in order to meet the
21 out-of-service cleared within 24 hours index?

22 A That would call -- I would have to elaborate on
23 that. Not specifically, no.

24 Q Okay.

25 A For that purpose, no. It's a common practice to

1 put the correct restoral time on a trouble report. If it
2 happens to be that that restoral time was prior to the 24
3 hours, yes. If it happens to be that the restoral time is
4 after the 24 hours, it's the correct restoral time that goes
5 on the report, the time the customer was restored.

6 Q Are you aware of any practice in an IMC of
7 directing maintenance administrators to call a manager to
8 get disposition and cause codes for closing out a customer
9 trouble report?

10 A Would you repeat that?

11 Q Are you aware of a practice in an IMC of
12 maintenance administrators or service technicians having to
13 call a manager to get disposition and cause codes to close
14 out a trouble report?

15 A No.

16 Q Have you ever had that practice yourself as a
17 manager?

18 A Not a practice, but I have had it occur where they
19 would ask for the opinion, maybe the outside foreman wasn't
20 available.

21 Q Okay. Then was it sort of standard procedure that
22 in order to close out a trouble report with a disposition
23 and cause code that the employee would have to talk to
24 either an outside foreman, or if that person was not
25 available, talk to you before closing it out?

1 A No. They have their own practices. They're
2 supposed to know the disposition and cause codes.

3 Q Okay. Are you aware of any employee who has used
4 the no access codes to stop the 24-hour clock on a customer
5 trouble report?

6 A I would ask you to elaborate on that, because --
7 and we use the no --

8 Q Improperly?

9 A Improperly, no.

10 Q Okay. Are you aware of any employee who has used
11 a no access code without contacting the customer?

12 A Improperly? No.

13 MR. BEATTY: I object to the form of the question.

14 I think it needs to be clarified.

15 BY MS. RICHARDSON:

16 Q Are you aware of any employee who has used the no
17 access code without leaving a notice at the residence or
18 speaking to the customer?

19 A No.

20 Q Are you aware of any employee who has used the
21 carryover no or the CON intermediate status transaction code
22 as a way of extending the commitment time without talking to
23 the customer?

24 A Improperly, no.

25 Q Are you aware of any procedures that may have been

1 used or any methods that may have been used to status
2 affecting service troubles as out-of-service in order to
3 build the out-of-service base and meet that 95 percent
4 repair index?

5 A The only knowledge that I have of that are out of
6 the -- or I believe it was a review that was done in North
7 Dade and two people were terminated for it. I believe the
8 outcome of that was because that was what was going on
9 there. Again, I have -- it's only hearsay that I have
10 knowledge. I don't have any direct knowledge that that's
11 what occurred.

12 Q And do you know by hearsay the names of those two
13 individuals?

14

15

16 A Yes. I would -- yes, sounds like it.

17 Q Okay. Do you know -- well, let me back up. Have
18 you, yourself, ever statused an affecting service trouble as
19 out-of-service in order to meet the 95 percent index?

20 A Improperly, no.

21 Q Would you define what proper statusing of
22 affecting service to out-of-service would be?

23 A Okay. A customer calls in. They have a bedroom
24 jack that is out. Okay. We have the report is due
25 tomorrow. The customer calls back in and now they say they

1 don't have any dial tone at all at the house. It's
2 originally affecting service, and now it's out-of-service.
3 Regardless of whether it's the 24 hours or not, it's whether
4 the customer can or cannot originate a phone call. So, in
5 that particular instance, yes.

6 Q Okay. Are you aware of any employee who has taken
7 an affecting service report, found that it was
8 out-of-service, but it had gone out over 24 hours, and then
9 they closed it as affecting service, instead of restating
10 it?

11 A Improperly, no.

12 Q Have you ever done so yourself?

13 A No.

14 Q Are you aware of, or do you know if certain
15 disposition codes exclude a report from being counted in
16 that out-of-service over 24 hours index?

17 A Disposition code?

18 Q Uh-huh.

19 A To my knowledge, the no access code, which is a
20 12, or if a trouble report has been no access, I believe.

21 Q That that would exclude the report from the
22 24-hour index base?

23 A Yes.

24 Q Okay. What about an inside wire disposition code?

25 A I'm not sure.

1 Q What about some of the cause codes, like hurricane
2 or lightning?

3 A We do have some cause codes that exclude it,
4 beyond Southern Bell's control.

5 Q Okay. Are you aware of any employee who has used
6 those excluding disposition and cause codes to exclude a
7 report that has gone out-of-service over 24 hours to meet
8 the 95 percent repair index base?

9 A Not improperly, no.

10 Q If that report is excluded, do you know whether or
11 not a customer would be due a rebate anyway?

12 A If the trouble report is excluded based on the
13 cause code?

14 Q Using one of those disposition codes, would the
15 customer be eligible for rebate? Do you know?

16 A I don't know. I don't know if the rebate goes
17 hand-in-hand with the index.

18 Q Okay. What about hand-in-hand with the
19 disposition codes that are excludable codes?

20 A Again, I don't know.

21 Q What about hand-in-hand with the cause codes, do
22 you know?

23 A No.

24 Q Okay. Do you know of any employee who has closed
25 out an out-of-service trouble report that was in danger of

1 going over 24 hours, and then reopened a new report in order
2 to finally clear and close it?

3 A Improperly, no.

4 Q Okay. Do you know if that's been done, and how
5 would it be done properly?

6 MR. BEATTY: I object to the form of the question
7 as compound.

8 BY MS. RICHARDSON:

9 Q All right. Let's take it one step at a time. Has
10 anyone ever closed out a trouble report and then reopened
11 it?

12 A Yes.

13 Q And on what basis was it reopened?

14 A I'm going to speculate. Okay? I don't have
15 specific details.

16 MR. BEATTY: Then I would object on that basis.

17 MS. RICHARDSON: But she can answer it.

18 MR. BEATTY: Yes.

19 THE WITNESS: Okay. I would say that if the
20 customer's service was restored, and we have to bury
21 the wire, but their service is restored, and there is
22 routine work that needs to be done, that in that
23 particular instance it would be a possibility that the
24 customer's trouble report was closed out, and maybe
25 another one generated to have the technician go back

1 two weeks later or whenever they have to go back.
2 Another case might be if they have to dig up the
3 driveway, but they give the customer service, and the
4 customer has to order the contractor to dig up the
5 driveway. But they have service and then we go back
6 and bury it. Perhaps, maybe, in those cases.

7 BY MS. RICHARDSON:

8 Q Okay. Have you ever personally, yourself, taken
9 an out-of-service report and closed it out before the
10 service was restored and reopened another report in order to
11 avoid going over that 24-hour index?

12 A No.

13 Q Do you know of anyone who has taken out-of-service
14 reports and closed them out to test okay in order to build
15 the base of out-of-service to meet the 95 percent repair
16 index?

17 A No.

18 Q Have you, yourself, ever done so?

19 A No. Could I clarify something?

20 Q Please.

21 A Okay. When you say "did I know," okay, after a
22 review was done in South Dade, we had someone that was
23 making errors. Now, to my knowledge, it was not to build
24 the base. They were making errors. It was statusing
25 errors. And they were miscoding trouble reports. I don't

1 remember the exact number. I think it was four or five that
2 came out in the review. But, to my knowledge, it was not to
3 build the base. It was just a training process that they
4 needed to be recovered on, on how to screen a trouble
5 properly.

6 Q And do you know who that was?

7 A Do I know who the employee was?

8 Q Uh-huh.

9 A Susie Robinson.

10 Q Okay. And that's R-O-B-I-N-S-O-N?

11 A Yes.

12 Q Do you know how to spell her first name?

13 A S-U-S-I-E, I guess.

14 Q Okay. Do you know of any employee who has used a
15 dummy employee code when entering a status on a customer
16 trouble report?

17 A Improperly or on purpose?

18 Q Any dummy employee code properly or improperly?

19 A We have had instances where employees mistype a
20 number. And it is an employee code, but it might be vacant.
21 And they're off, for instance, the number might be 651 and
22 they type 661.

23 Q Okay. Have you ever done that yourself?

24 A No, not to my knowledge.

25 Q Okay. Do you know of any employee who has used

1 another employee's code when statusing a customer trouble
2 report?

3 A No.

4 Q Have you ever done so yourself?

5 A No.

6 Q Do you have any knowledge, direct or hearsay, of
7 information that comes from the Company's internal
8 investigation?

9 MR. BEATTY: Object to the form of the question,
10 compound. And I object also based upon the relevance
11 of this question with regard to the subject matter that
12 you're speaking to inquire upon, recognizing that
13 you're asking for a "yes" or "no."

14 BY MS. RICHARDSON:

15 Q A "yes" or "no" response, please.

16 A Do I have to answer "yes" or "no"?

17 Q Yes.

18 A Would you repeat it?

19 Q Do you have any information based -- do you have
20 any knowledge of any information that comes from the
21 Company's internal investigation?

22 A No.

23 MS. RICHARDSON: Okay. Ms. Haney, I want to thank
24 you for being here today. Excuse me. I may have
25 another question.

1 THE WITNESS: Okay.

2 MS. RICHARDSON: I am through with my questions,
3 and I do want to thank you for appearing here today.
4 The Public Service Commission people may have one or
5 two questions for you before you go.

6 THE WITNESS: Okay.

7 MS. RICHARDSON: Thank you very much.

8 MR. GREER: I have a couple, real quick.

9 CROSS EXAMINATION

10 BY MR. GREER:

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14

15 A Not exactly.

16 Q Any ballpark figures, maybe a month?

17 A Two weeks, a week and a half.

18 Q Oh, okay. Not very long, then? Have you inquired
19 about the meeting since the letter?

20 A No.

21 MR. GREER: That's all.

22 MS. RICHARDSON: Thank you, Ms. Haney.

23 (The deposition was concluded at 3:10 p.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 FAIN 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 30 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,

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

Melanie Y. Bradford
NOTARY PUBLIC
STATE OF FLORIDA

