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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

COPY

DEPOSITION OF: JOYCE HAMMAN
TAKEN AT THE INSTANCE OF: Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel
DATE: Friday, July 31, 1992
TIME: Commenced at 11:01 a.m. Concluded at 11:45 a.m.
PLACE: 6451 North Federal Highway Room 1015A Fort Lauderdale, Florida
REPORTED BY: JANE FAUROT Notary Public in and for the State of Florida at Large

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

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APPEARANCES:

REPRESENTING THE SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:

HARRIS R. ANTHONY, ESQUIRE
BellSouth Telecommunications, Inc.
d/b/a Southern Bell Telephone & Telegraph Company
c/o Marshall M. Criser, III
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Tallahassee, Florida 32301

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

SUE RICHARDSON, ESQUIRE
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c/o The Florida Legislature
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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
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Tallahassee, Florida 32399-0863

REPRESENTING JOYCE HAMMAN:

R. H. "BO" HITCHCOCK, ESQUIRE
Hitchcock and Cunningham
613 S. E. 1st Avenue
Fort Lauderdale, Florida 33301

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.

JOYCE HAMMAN

Direct Examination by Ms. Richardson
Cross Examination by Ms. Wilson

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CERTIFICATE OF REPORTER

37

S T I P U L A T I O N S

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

* * * * *

Thereupon,

JOYCE HAMMAN

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

MR. HITCHCOCK: R. H. "Bo" Hitchcock, attorney for Joyce Hamman.

MR. BEATTY: Robert Beatty, Attorney for Southern Bell.

Let me indicate to you the stipulations that have been agreed to up to this point. First of all, we have stipulated that these depositions or this deposition is taken pursuant to proper notice from Public Counsel, that without your agreement and client's agreement that there will be no going off the record during the course

1 of the depo. We will save all objections, except as to
2 form, and that there will be no waiving of the reading
3 and signing of the depo, unless you choose otherwise.

4 And further, just let me say that as you both
5 probably know, there has been an internal investigation
6 conducted by Southern Bell and that investigation was
7 conducted pursuant to the attorney/client privilege and
8 the attorney work product doctrine. Those privileges,
9 as you may well know, protect the unauthorized
10 disclosure of information regarding that investigation.
11 Pursuant to that, therefore, I would appreciate it if
12 would you not disclose anything regarding the
13 investigation in this deposition today. Okay?

14 THE WITNESS: Yes.

15 MR. BEATTY: All right.

16 MS. RICHARDSON: Including, just sort of picking
17 up on that, if you would, I may ask you a question if
18 you know something and you need to let me know whether
19 or not you know it. And then Mr. Beatty will object
20 for the record. Don't just withhold information.
21 Okay? Give him a chance to object is all I'm asking.
22 That way we will get an objection on the record.

23 THE WITNESS: Right. I understand.

24 MS. RICHARDSON: Did you have any opening remarks?

25 MR. HITCHCOCK: No. I'm ready to go.

1 MS. RICHARDSON: Okay. Great.

2 I have just two little preliminaries in terms of
3 communication and understanding what we are talking
4 about. And they are just general terms. For instance,
5 "I don't know," if you tell me that you don't know
6 something or I ask you, "Do you know," and you respond,
7 "No," then that means that you have no personal, direct,
8 firsthand knowledge and you haven't heard anything and
9 you haven't seen anything. Is that acceptable?

10 THE WITNESS: Yes, it is.

11 MS. RICHARDSON: And then pretty much the same
12 thing for, "I don't recall," or "I can't remember,"
13 absolute blank. There is not any little niggling
14 ticklers out here. If there are, tell me, "I don't
15 remember. There may have been something at one time."
16 And that will give me a chance to question you and
17 maybe more things will come back to your memory. Is
18 that acceptable?

19 THE WITNESS: Yes, it is.

20 MS. RICHARDSON: Okay.

21 DIRECT EXAMINATION

22 BY MS. RICHARDSON:

23 Q Then if you would, Ms. Hamman, if you would state
24 your name and spell it for the record, so we will have it
25 accurately?

1 A Joyce Hamman, J-O-Y-C-E, Hamman, H-A-M-M-A-N.
2 Q And your address, please?
3 A
4
5 Q And what is your present position with the
6 Company?
7 A I am an MA, a maintenance administrator, in the
8 Broward Maintenance Center.
9 Q South Broward, North Broward?
10 A North Broward.
11 Q You drive every day?
12 A Yes, I do. I commute about 45 minutes.
13 Q How long have you held this position?
14 A I have been a MA for seven years.
15 Q Okay. All the time in the South Broward Center?
16 A No, three years at North Broward.
17 Q I'm sorry.
18 A I transferred from Gables.
19 Q From Gables. Okay. And what is your present pay
20 grade? Are you **craft** or management?
21 A I'm craft.
22 Q You're **craft**?
23 A Yes.
24 Q Okay. And your transfer from Gables to the
25 Broward center, was that a promotion for you?

- 1 A No, it was a lateral move.
- 2 Q A lateral move. And why did you make that move?
- 3 A We were toying with the idea of relocating.
- 4 Q You mean you, personally?
- 5 A Personally.
- 6 Q Okay. When did you start with the Company?
- 7 A 1960.
- 8 Q Okay. And what was your entry position?
- 9 A I was a traffic operator for six years.
- 10 Q What does a traffic operator do?
- 11 A In the old main downtown Miami.
- 12 Q Okay. And what does a traffic operator do?
- 13 A In my position we handled The Latin American
14 Central Unit of the Netherland Islands as an operator.
- 15 Q Wow. Okay. Who is your present supervisor?
- 16 A I have two supervisors. I have Dennis Marshall,
17 who is my first line manager. And I have Dennis Slattery,
18 who is my second level manager.
- 19 Q All right. And just to briefly explain for me,
20 you've worked for the Company a long time, about how much of
21 that period of time has involved your handling customer
22 trouble reports or any aspect of handling a customer trouble
23 report?
- 24 A I became an MA in '84, approximately '84. And I
25 have been an MA ever since.

1 Q All right. So, before '84, then, you had nothing
2 to do with -- none of your duties involved customer trouble
3 report handling?

4 A Correct.

5 Q And then as an MA, I would like to get a little
6 bit more specific on the nature of your job duties and
7 responsibilities in terms of customer trouble report
8 handling. If you can kind of explain to me what you have to
9 do?

10 A In my present position?

11 Q Uh-huh.

12 A I work with the customers, directly with the
13 customers. After I isolate the problem, my format is I
14 contact the customer immediately, regardless, whatever the
15 test may be, when I test the trouble. And to try to isolate
16 from the customer exactly what his problems are and then act
17 accordingly.

18 Q Okay. What do you mean "act accordingly"? I'm
19 not quite sure what you mean.

20 A Oftentimes when a call comes in, it goes to our
21 centralized repair office, and it is funneled out to the
22 different offices that handle those offices. And so
23 everything is pretty much itemized when it comes to our
24 centralized repair. Oftentimes the customer will say it was
25 a physical problem. And once you contact the customer, it

1 may not be a physical problem at all. So, you have to sort
2 of pinpoint with the customer precisely what his problems
3 are. It could be nothing. It could be just a question that
4 he has for you. And it was not -- I don't say necessarily
5 was taken wrong, but we have certain categories how we
6 generate a customer report in centralized repair.

7 Q Okay. Can you explain those categories for me?

8 A I'll try. I don't work centralized repair, but
9 oftentimes when a trouble comes in it's either a physical
10 trouble; it's no dial tone, can't call, no dial tone. It
11 could be an equipment problem. So, it's a category of maybe
12 four or five things at most.

13 Q Okay. And is that a type code?

14 A It's a type code, yes.

15 Q Okay. And then in terms of statusing a report,
16 whether it's affecting service or out-of-service, is that
17 part of your responsibility?

18 A Yes, it is.

19 Q And how do you determine whether a report is
20 affecting service or out-of-service?

21 A I will call the customer, and if I am able to talk
22 to you, I know it's not out-of-service.

23 Q Okay. And then if you were able to talk to me,
24 how would you clear and close that report?

25 A I would decide from you exactly what problems you

1 were having.

2 Q Okay. And then what would you do with the report?

3 A And then I would status it accordingly.

4 Q Okay. Out-of-service or affecting service?

5 A Absolutely.

6 Q And then how would that report get cleared and
7 closed out?

8 A I would close it out.

9 Q Oh, okay. By entering something in the computer?

10 A Yes. We have certain set codes that we would put,
11 disposition and cause codes.

12 Q Okay. Could you briefly just tell me what your
13 understanding of a disposition and a cause code are?

14 A If I called you and the trouble was, let's say, an
15 equipment problem, I would status it accordingly, to an
16 equipment problem. But I would have to make sure that it
17 was an equipment problem. If it was okay, I would status it
18 to a test okay trouble.

19 Q Okay. And when you say, "equipment problem," do
20 you mean the customer's personal equipment?

21 A Yes.

22 Q Inside his house?

23 A Absolutely.

24 Q Okay. So, we are not talking, then, about plant
25 or outside cable?

1 A No, I wouldn't be handling that. If I had a
2 problem with cable, then I would be statusing it to a cable
3 problem, who handles nothing but cable.

4 Q Okay. And in terms of your prior duties, because
5 you said -- you mentioned this is what you do presently?

6 A Yes.

7 Q In your past duties as an MA, was your handling of
8 a report any different than what it is now?

9 A I have not handled it differently, no.

10 Q Okay. So, you have not handled it differently.
11 Has there been any Company practices and procedures in your
12 experience that have been different in your initial MA
13 experience and the way you do things now?

14 A I have not deviated, other than what I am doing
15 today.

16 Q Okay. Are you familiar with certain disposition
17 and cause codes that exempt an out-of-service report from
18 being counted in the out-of-service-over-24-hours base?

19 A Yes, I am.

20 Q Can you give me some examples?

21 A If a technician was in the field, and I was
22 working with him or he was calling in to say -- we have to
23 close out the troubles in the CAT terminals. But if he was
24 having some difficulty with his CAT terminal, he was calling
25 in live, and I would be working with him, I would be aware

1 of what the commitment time was. And they are, too. And
2 oftentimes he would give me a disposition code and a cause
3 code. And in the narrative I would specify what the
4 problems were or are. And I would ask him, maybe not on
5 every occasion, but I would ask him, "What time did you
6 restore service," if that be the case.

7 Q Uh-huh.

8 A And he would say 2:00, and I would put 2:00.

9 Q Okay. Did he ever make a distinction between the
10 time he restored service and the time he finished actually
11 working on that particular area?

12 A He was never that vocal. People that I worked
13 with, if they told me 2:00, I put 2:00.

14 Q Okay. Have you ever heard the terms "backing up
15 the times" in reference to a customer report?

16 A I may have, but it has been vague. I still do
17 what I think is necessary.

18 Q Okay. I would like to get a little bit more
19 clear. You say it's vague. What parts or in what context?
20 Has it been in the context of an IMC that you have heard of
21 this?

22 A I'm not sure, but oftentimes the scuttlebutt in
23 the office. We have certain procedures. It's like any
24 other company. Oftentimes you may not want to abide by our
25 rules and regulations. But if I contacted you, and I was

1 working with you, and you told me that the trouble was
2 cleared at a precise time, the exact time was what I put
3 down.

4 Q Okay. And so then the "scuttlebutt in the
5 office," can you be a little bit more clearer, then?

6 A It would be no more than scuttlebutt, than any
7 other office. You know, pros and cons of our dealing with
8 the Company or managerial people.

9 Q Okay. And then have you heard it in the context
10 where times were backed up improperly, is that part of your
11 memory?

12 A I may have. Personally, it has never affected me.

13 Q Okay. Would this be in relation to the specific
14 IMC that you have worked in?

15 A I would say yes.

16 Q Okay. And within the context of the scuttlebutt
17 and what you have heard, have you heard that this was a
18 general practice in that IMC?

19 MR. BEATTY: Can you be specific? I object on the
20 grounds of vagueness. Can you be more specific about
21 what the scuttlebutt was?

22 MS. RICHARDSON: Yes. I'm trying to get the
23 witness to be more specific, rather than me putting
24 words in her mouth, is the idea.

25 BY MS. RICHARDSON:

1 Q Have you heard, when you have heard these rumors
2 and the scuttlebutt, whether or not the backing up of these
3 times was isolated incidents or whether it was a more
4 general practice within that IMC?

5 A My understanding is that in our practices, our
6 people are very, very cautious of a time commitment. They
7 want to satisfy the customer. And if it's 2:00 -- this is
8 my generalization -- if it is 2:00, they want us to sort of
9 probe you, per se. "Was it really 2:00 that you gave this
10 customer dial tone or it was later?" So, I don't think they
11 are really gung ho or pursuing that technician, or whoever
12 it may be, we're still aware that we have a commitment time
13 and we have a customer to take care of. And that is the way
14 I have always treated it.

15 Q Have you heard of anyone else treating it
16 differently than the way you treat it?

17 A It may have occurred, yes. I personally have no
18 knowledge. But, again, when I use the word "scuttlebutt,"
19 they may have. Then, again, I know it's evasive, but they
20 may or may not have.

21 Q Okay.

22 A But I know what I did.

23 Q Right. And I appreciate that. And please
24 continue, Ms. Hamman, to distinguish between yourself, and I
25 will try to give you some questions that will give you an

1 opportunity to distinguish between yourself and other people
2 and what you may have heard in terms of rumors and
3 scuttlebutt, so that you're comfortable with what you put on
4 the record in terms of your performance. And if I fail to
5 do that, please feel free to add that to any response.

6 A I will.

7 Q And this goes back -- I should have given you this
8 to begin with, and I'm sorry. We are interjecting it now.
9 If you don't understand any question --

10 A I'll ask you.

11 Q Yes, great. Ask for clarification, and I'll just
12 say it another way, so that you're comfortable that your
13 response matches whatever I've asked.

14 Have you ever heard of an example -- do you know
15 anyone who has backed up repair times in order to meet that
16 out-of-service-over-24-hour index?

17 A I don't know personally.

18 Q Okay. Have you heard of anyone?

19 A Maybe vaguely I have.

20 Q Okay.

21 A Maybe discussing it. But, personally, I have not
22 seen it any more than I would be aware of what, you know,
23 you jotted down on your statement. You know, I would not
24 see that.

25 Q Okay. And, again, have you heard that in relation

1 to the Broward IMC?

2 A No, I have not.

3 Q Have you heard it in relation to which IMC?

4 A The scuttlebutt maybe came from the Metro area.

5 Q Let me give you your opportunity. Have you ever
6 backed up the time on a customer trouble report?

7 A No, I have not. I have not.

8 Q Has anyone ever directed you to back up the time
9 on a customer trouble report?

10 A No, they have not. They have not.

11 Q Ms. Hamman, have you recently been disciplined by
12 the Company?

13 A I have never been disciplined.

14 Q Do you know anyone who has been disciplined by the
15 Company?

16 A Well, it depends on how you categorize discipline.
17 I think corrective criticism is not necessarily disciplinary
18 action.

19 Q Formal B form discipline in relation to this
20 particular investigation?

21 A I'm not aware of any.

22 Q Okay.

23 A It may have happened. I'm not aware of anyone
24 personally being B-Formed.

25 Q Okay. Have you heard of anyone being disciplined

1 using the B form in relation to this particular
2 investigation?

3 A No, I don't believe I have.

4 Q Okay. Have you discussed with Company
5 investigators any activities in an IMC related to this
6 investigation?

7 MR. BEATTY: I object on the ground that I have
8 articulated -- I understand you're asking for a "yes"
9 or "no".

10 MS. RICHARDSON: Yes.

11 THE WITNESS: No.

12 BY MS. RICHARDSON:

13 Q Do you have any direct, firsthand knowledge about
14 the Company's internal investigation?

15 MR. BEATTY: Same objection on the grounds of
16 attorney/client privilege and work product privilege.
17 I assume you're asking for a "yes" or "no"?

18 THE WITNESS: Yes, I am aware of what is going on.

19 BY MS. RICHARDSON:

20 Q Okay. Can you tell me what your understanding is
21 of what is going on?

22 MR. BEATTY: I will object on the grounds that
23 it's attorney/client privilege and attorney work
24 product privileges, unless you know what is going on
25 based upon something like the news that you read in the

1 newspaper, or you heard on TV, or you heard it on the
2 radio, or something like that, something outside of the
3 investigation itself.

4 (Discussion Off the record,)

5 MS. RICHARDSON: Okay. We're back on the record
6 now.

7 BY MS. RICHARDSON:

8 Q I need a verbal response.

9 A I don't know of any, other than what I hear on
10 television, and that is about the extent of it. And the
11 discussion of what we hear on television within our
12 framework of our office, just like you and I discussing
13 this, that or the other.

14 Q Okay.

15 A It's neither negative or otherwise. It's just
16 what we hear and what we read.

17 Q Okay. Then within the context of these
18 discussions with your co-workers about what you have heard
19 and what you have read, has anyone told you of specific
20 incidents that have been concerned with mishandling customer
21 trouble reports?

22 A No, nothing specific.

23 Q Ms. Hamman, have you ever reported an individual
24 to higher management?

25 A No.

1 MR. BEATTY: I would object. I withdraw.

2 MS. RICHARDSON: Can I finish my question.

3 MR. BEATTY: I'm sorry. I thought you had
4 finished, I withdraw my objection

5 MS. RICHARDSON: No, I have not.

6 BY MS. RICHARDSON:

7 Q Okay. Do you know whether anyone has reported you
8 to higher management for mishandling customer trouble
9 reports?

10 A No, they have not.

11 MR. BEATTY: I withdraw the objection.

12 Ms. Hamman, could you pause for a few seconds. I
13 hate to interrupt her, but I want to make sure I get it
14 in before you respond.

15 MS. RICHARDSON: You're doing great.

16 MR. BEATTY: Oh, you are. You're doing great.

17 BY MS. RICHARDSON:

18 Q Ms. Hamman, do you know of any practice in an IMC
19 where maintenance administrators were asked to call a
20 manager or talk to a manager before clearing and closing
21 out-of-service reports?

22 A If they had a qualm, I'm sure -- I have not. I
23 cannot specifically say it was a person, but I know if an MA
24 had a problem or had a question, it wouldn't phase he or she
25 to discuss it with you.

1 Q Have you heard of that practice being done on a
2 very broad basis? In other words, every time a report is
3 about to go out-of-service over 24 hours, an MA is directed
4 to get a manager's signature before closing that report?
5 Have you heard of that being done?

6 A I have not. I have not. I wouldn't be privy to
7 that, anyhow.

8 Q Okay. Has anyone ever directed you to contact a
9 manager before closing out an out-of-service?

10 A No.

11 Q Ms. Hamman, are you familiar with the no access
12 code?

13 A Yes, I am.

14 Q Can you briefly tell me what your understanding of
15 that code is?

16 A If a technician went to a premise and the customer
17 was not there, he would do one of two things. He would
18 check to see whether or not he had all the necessary details
19 in order to contact that customer, like a reach number; or
20 he would call me and ask me to assist him. And in turn, I
21 may have the capability of going into our records and
22 pulling up maybe a business office transaction or a recent
23 business office transaction or just records. Maybe it was a
24 typographical error, and he didn't have access to it. And I
25 would supply him with that information, so he could maybe

1 further his completion of his problem or be able to contact
2 the customer.

3 Q Okay. Is it your understanding of the no access
4 code, then, that the technician is to always contact the
5 customer before no accessing?

6 A Absolutely.

7 Q Do you know of anyone who has used the no access
8 code to stop the repair clock on an out-of-service problem?

9 A Not to my knowledge.

10 Q Okay. Have you ever done so?

11 A I have not.

12 Q Has anyone ever directed you to do so?

13 A No.

14 Q Do you know what excluding a report is?

15 A Yes, I do.

16 Q Can you briefly explain your understanding of
17 that?

18 A It could be several facets. For instance, if a
19 customer had a problem, and then after speaking to maybe our
20 centralized repair that they found -- they isolated the
21 problem themselves, they would call in and indicate that the
22 trouble is okay. I will cancel my order and we would
23 exclude that.

24 Q Okay. Within the context of your job
25 responsibilities and your training and your understanding of

1 Company procedures, is it appropriate at any point to
2 exclude an out-of-service report?

3 A Never.

4 Q Okay. So, do you know of anyone who has taken an
5 out-of-service report and excluded it and then reopened it
6 in order to clear and close it?

7 A I have never.

8 Q Okay. And do you know of anyone else who has?

9 A Personally, not to my knowledge.

10 Q All right. Have you ever heard of that occurring?

11 A I have not.

12 Q And has anyone ever directed you to do so?

13 A Never.

14 Q Are you familiar with commitment times?

15 A Yes, I am.

16 Q And that is the time that you give the customer
17 that his problem is going to be repaired?

18 MR. BEATTY: Object to the form of question as
19 leading.

20 BY MS. RICHARDSON:

21 Q Would you please explain your understanding of
22 what the commitment time is?

23 A A commitment time, we have a 24-hour clock, is the
24 terminology that we use, and we try to meet our commitments
25 every way possible. It doesn't necessarily mean that you

1 have to -- I, personally, have never falsified the records
2 to meet a commitment. And I personally don't know of anyone
3 that has, personally.

4 Q Okay. Have you ever heard of anyone doing that?

5 A I don't know of anyone personally that has done
6 that, no.

7 Q But have you ever heard any rumors or scuttlebutt
8 in the office about people doing that?

9 A Not to my knowledge, no, I have not.

10 Q All right. And no one has ever directed you to do
11 that?

12 A No, never. Never.

13 Q Have you ever heard of anyone recording an
14 extension of that commitment time without contacting the
15 customer?

16 A No.

17 Q And have you ever done that?

18 A If I can't meet a commitment, I will, whatever way
19 possible, I will contact the customer and see whether or not
20 we can have a subsequent time. But then we have to itemize
21 or the person I have spoken with, and I cannot change a
22 commitment. I don't have that capability. I have to refer
23 to a supervisory person. And in turn, they would make the
24 commitment, and I would identify or specify who I had spoken
25 with. And it is documented, I spoke with John or whoever.

1 Q And has that been the case throughout your entire
2 term as an MA, from the very first day you started as an MA
3 to present?

4 A Doing what?

5 Q Exactly what you have just explained to me about
6 your not being able to change the commitment, your having to
7 contact a manager to change that commitment time?

8 A That is the procedure I have always used.

9 Q Okay. I'm trying to get a feel if that is recent
10 or if that has always been the way you've --

11 A That's always the way I've handled it.

12 Q Okay. Do you know of anyone who has used the
13 carryover no or the CON code to stop the clock on a trouble
14 report?

15 A No, I have not.

16 Q Are you familiar with the CON code?

17 A I am, but I have no problem with that.

18 Q Do you still use the CON code?

19 A Meaning what? I don't quite understand.

20 Q Have there been recent changes in some of the
21 codes that are available for use by MAs in statusing trouble
22 reports?

23 A We have a generalization of codes that we use.

24 Q Okay. Have there been changes in the codes?

25 A The codes that we were using today have been in

1 existence for a long time. We maybe have shorten our code
2 section, but our codes are pretty much the same that they
3 have always been.

4 Q I guess that's what I am asking, too, now. In
5 terms of shortening, for instance, the 1200 hundred set of
6 code?

7 A Yes.

8 Q Are those inside wire codes?

9 A Yes.

10 Q All right. And let's say in 1990 you may have had
11 how many 1200 codes in that series?

12 A I really can't say.

13 Q Do you have just the same exact codes today or are
14 there fewer?

15 A They have been abbreviated.

16 Q Okay. So, those codes have been shortened. All
17 right. Then in terms of --

18 MR. BEATTY: Not shortened, abbreviated.

19 MS. RICHARDSON: I'm sorry. Shortened is improper
20 in terms of I'm characterizing your testimony.

21 BY MS. RICHARDSON:

22 Q There are fewer codes, is that what you're saying
23 in that series of 1200?

24 A Yes, I would say so.

25 Q All right. Then in terms of the carryover no code

1 that you are familiar with that you have said, have there
2 been any changes by the Company in that particular code
3 recently within, say, since January of '92 of this year?

4 A When you say "carryover"?

5 Q The C-O-N code, the CON code?

6 A The CON code. I haven't had that many future due
7 date.

8 Q Oh, okay.

9 A We call it future due date. If it is
10 out-of-service, naturally, we would get right onto it. We
11 would, you know, dispatch it and act accordingly.

12 Q Okay. I want to move to affecting service and
13 out-of-service statusing of reports. Is that part of your
14 responsibility to status trouble reports?

15 A Absolutely.

16 Q Okay. Can you tell me how you determine whether a
17 report is affecting service or out-of-service?

18 A I would call you, and if I was -- can't call, a no
19 dial tone is an out-of-service.

20 Q Based just on what the customer says?

21 A No, not necessarily. If I'm able to call you,
22 it's not out-of-service. However, if I'm able to contact
23 you, and you are not -- and you are unable to hear, service
24 is affected. It's a trans code that's interference, et
25 cetera. So, therefore, I would code it differently,

1 naturally, because it's not completely out-of-service. You
2 and I can communicate.

3 Q Okay. Do you also work with the automatic testing
4 that goes through?

5 A Yes, I do.

6 Q All right. Then when you get a discrepancy
7 between the automatic test and what the customer says, how
8 do you make a determination on how to status that report?

9 A Again, I always contact the customer. And if I'm
10 unable to reach you, either directly or reach a number to
11 find out exactly what your problem is, then, you know --
12 well, I know that it is an out-of-service problem, because
13 you can't be called, and I'm not able to reach you, a reach
14 number. I'm testing it that it is out-of-service. I have
15 certain types of tests that I would be able to decipher
16 whether or not it is an equipment test or is it true test.

17 Q Okay. Have you ever had a customer call and
18 complain that his phone -- he couldn't make calls out, but
19 the test, automatic test, showed a line in use?

20 A Absolutely.

21 Q Okay. And then what would you do with that
22 particular incidence?

23 A Well, we have certain techniques that we would
24 check to see if it is really a true test. It could be a
25 line in use by talking or it could be a legitimate line

1 problem. And we have those capabilities to isolate whether
2 or not is it a true test.

3 Q Okay. You are familiar with the rule that the
4 Company must clear out-of-service reports within 24 hours at
5 least 95 percent of the time, aren't you?

6 A Yes, I am.

7 Q Okay. Then do you know of anyone who has taken
8 affecting service reports and statused them out-of-service
9 in order to meet that 95 percent index in that rule?

10 A No.

11 Q Have you ever done so yourself?

12 A No, I have not.

13 Q Has anyone ever directed you to do so?

14 A No, they have not.

15 Q Have you ever heard of that being done?

16 A I may have. But, again, it would be rumor or just
17 some people just talking.

18 Q Okay. Have you ever heard of anyone using any
19 other means to meet that 95 percent requirement?

20 A Such as?

21 Q Any other means. I'm not real sure how the system
22 works or anything, in order to just meet that 95 percent
23 requirement?

24 A The answer would be no.

25 Q Okay. Do you know what a test okay is?

1 A I sure do.

2 Q Okay. And your understanding of a test okay is
3 what?

4 A No line trouble or it could be an equipment
5 problem.

6 Q Okay. Do you know of anyone who has taken
7 out-of-service reports -- excuse me, test okay reports and
8 statused them out-of-service in order to meet that 95
9 percent requirement?

10 A No, I have not.

11 Q Have you ever done that yourself?

12 A I have not.

13 Q Has anyone ever directed you to do that?

14 A No, they have not.

15 Q Do you know of anyone who has recorded an
16 extension of time on a commitment for the trouble report
17 without contacting the customer?

18 A Not to my knowledge.

19 Q Okay. Have you ever heard of that being done?

20 A No, I have not.

21 Q Okay. Has anyone ever directed you to do that?

22 A No, they have not.

23 Q And you have already told me that you haven't,
24 which is why I'm not asking it again.

25 Do you know of anyone who has violated Company

1 procedures for ~~handling~~ customer reports?

2 MR. BEATTY: Objection on the grounds that it
3 calls for a legal conclusion.

4 BY MS. RICHARDSON:

5 Q You can respond.

6 A No, I have not.

7 Q Okay. Has anyone ever directed you to violate a
8 Company procedure in handling a customer report?

9 MR. BEATTY: Same objection.

10 THE WITNESS: Never.

11 BY MS. RICHARDSON:

12 Q Okay. And have you ever, yourself, violated
13 Company procedure for handling a customer report?

14 A No, I have not.

15 Q Ms. Hamman, do you know anyone who has used an
16 employee code other than their own to status a trouble
17 report?

18 A No, I have not.

19 Q Okay. Has anyone ever directed you to do so?

20 A No one.

21 Q And have you ever done so yourself?

22 A No, I have not.

23 (Discussion off the record.)

24 MS. RICHARDSON: I'm sorry for the interruption.

25 BY MS. RICHARDSON:

1 Q Do you know of anyone who has used the exempt
2 disposition and cause codes to exclude an out-of-service
3 over 24 hours report from that requirement?

4 A I don't know of anyone personally, no.

5 Q Okay. Have you ever heard of anyone doing that?

6 A No, I have not.

7 Q Okay. And has anyone ever directed you to do so?

8 A Never.

9 Q And have you ever done so?

10 A No, I have not.

11 Q Do you know of anyone who has falsified a customer
12 record?

13 A I don't know of anyone.

14 Q Have you ever heard of anyone doing that?

15 A I have not.

16 Q Okay. Has anyone ever directed you to do so?

17 A No.

18 Q And have you ever done so?

19 A No, I have not.

20 Q Do you know of a Prudence Taylor, Ms. Hamman?

21 A Yes, I do.

22 Q Within the work context?

23 A Yes, she was my supervisor.

24 Q She was your supervisor. At what time was she
25 your supervisor?

1 A Let me see. She worked with me in Gables in '85.

2 Q 1985?

3 A 1985.

4 Q Okay. At any time during your tenure under her
5 supervision, Ms. Taylor's supervision, did she ever direct
6 you to do something that you felt personally was incorrect
7 in terms of handling a customer record?

8 A No. She was a very, very dedicated person, and an
9 excellent supervisor. And she was very customer-oriented,
10 wanted us to make sure that we did everything just perfect.

11 (Pause)

12 Q I guess there are one or two final closing
13 questions to close this out. Do you know of anyone who has
14 mishandled a trouble report, a customer trouble report?

15 A Mishandled personally, no, I have not.

16 Q Okay. And let me see if I can clarify this a
17 little bit further, then. In terms of your experience as an
18 MA, do you know of anyone who has made an error in
19 procedure, or made a mistake, or a clerical error, or
20 something of that nature in handling a customer report?

21 A I may have.

22 Q Okay. Do you know of anyone else who may have?

23 A Not personally, because we have so many in our
24 office. It could have been brought to their attention. I
25 usually sort of take care of my own trouble reports.

1 Q You're probably so busy you don't have time?

2 A Precisely.

3 Q Okay. Then leaving aside the errors as a possible
4 mishandling, definition for mishandling, okay? And I would
5 like to leave aside in terms of defining mishandling
6 deliberate falsification or intentionally. I would like to
7 leave that aside and just deal with, say, misinterpretation
8 of procedures, that kind of thing. Have you heard of anyone
9 who has mishandled trouble reports?

10 A I personally -- I may have. Not to my
11 recollection that I could pinpoint anyone specifically. But
12 it's pretty much a general rule that we try to do things the
13 proper way, the accurate way, the customer-oriented way.
14 And I don't know anyone specifically who has been, you know,
15 reprimanded for that. It would be good corrective
16 criticism, I would consider. If I made a mistake, I would
17 want to be told about it.

18 MS. RICHARDSON: Ms. Hamman, I want to personally
19 thank you for being here, and I appreciate your taking
20 the time to come.

21 THE WITNESS: My pleasure.

22 MS. RICHARDSON: I'm glad it was. I have no
23 further questions for you myself at this time, but the
24 Public Service Commission may have a few before we
25 dismiss you.

1 THE WITNESS: All right. Thank you.

2 CROSS EXAMINATION

3 BY MS. WILSON:

4 Q Ms. Hamman, I wanted to ask you, I believe you
5 said there was a change to the inside wire codes. Do you
6 know why that change was made?

7 A To the inside wire code? I don't quite understand
8 the question.

9 Q I believe you said that the code were abbreviated
10 at one point, that there were some that were.

11 A I think they wanted us to make sure that we
12 isolated the problem correctly. Oftentimes -- it may be my
13 interpretation -- that as long as the line is okay -- this
14 is just for me. If the line is okay, we have a proper code,
15 a cause code. But, I mean, we should delve into the
16 problem, is it really an equipment problem or what the
17 problem is, and close it out accordingly. So, that's why we
18 really have to work with the customer a great deal to be
19 able to isolate what the problem is, and let them tell you.
20 Don't just assume.

21 Q There was a change to the inside wire codes? I
22 want to make sure --

23 A Quite recent. It used to be 1208. Am I correct?
24 And now it differs. You have to be very specific what it
25 is.

1 Q What is ~~that~~ difference, could you elaborate a
2 little bit? I want to make sure I understood.

3 A 1220, it's just a difference in code. It used to
4 be 1208-210, and now it's 1220-210. It's just an isolation
5 factor that we want to make sure that the customer is
6 well-taken care of. Is it an equipment problem or is it a
7 line problem?

8 MS. WILSON: Thank you.

9 (The deposition was concluded at 11:45 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 FAHN 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 36 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 27th 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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