

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL
FILED: October 7, 1992

9200360-72

In the Matter of:

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

DEPOSITION OF: APRIL IVY

DATE: October 14, 1992

TIME: Commenced at: 1:20 p.m.
Concluded at: 2:00 p.m.

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

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

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

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

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SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY
(BY: ROBERT G. BEATTY, ESQ. and
PHILIP CARVER, ESQ.)
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I-N-D-E-X

| WITNESS | DIRECT CROSS |
|------------------|---------------------|
| April Ivy | |
| (Ms. Richardson) | 5 |
| (Ms. Wilson) | 27 |
| (Mr. Vinson) | 28 |

EXHIBITS

(None)

1 THEREUPON:

2 APRIL IVY,

3 having been first duly sworn, was

4 examined and testified as follows:

5 MS. RICHARDSON: Mr. Scola, do you want to put
6 an appearance on the record?

7 MR. SCOLA: Robert Scola, on behalf of April
8 Ivy.

9 MR. BEATTY: My name is Robert Beatty on behalf
10 of BellSouth Telecommunications, Inc. doing business
11 as Southern Bell in Florida.

12 Let me at this point make a number of matters
13 of record.

14 Number one, that this deposition is taken
15 pursuant to proper notice as to date, time and place.

16 Number two, that the parties stipulate and
17 agree to reserve all evidentiary objections except as
18 to form, and occasionally as to relevance.

19 Number three, that we do not waive any reading
20 or signing of the deposition in the event that the
21 deposition is ordered transcribed.

22 And number four, as everyone knows, the
23 Southern Bell Legal Department conducted an internal
24 investigation regarding the matters relevant in this
25 docket, and that that internal investigation being

1 conducted by the legal department is protected by the
2 attorney-client privilege and the attorney work
3 product doctrine.

4 I would therefore request from Miss Ivy that
5 you do not divulge any information that you may have
6 obtained from the conduct of the investigation, and
7 that your response be limited to that which you know
8 personally, your own personal knowledge. I would
9 also request however that if in fact you are asked a
10 question to which the response is to reveal something
11 that is privileged, that you let us know, that you
12 not reveal this information but that you let us know
13 so that we can make the necessary objections and put
14 that particular matter on record.

15 MS. RICHARDSON: Okay.

16 DIRECT EXAMINATION

17 BY MS. RICHARDSON:

18 Q. Ms. Ivy, have you been advised to limit your answers
19 here in any way?

20 A. No, just what you just heard.

21 Q. Then will you agree to answer my questions fully and
22 completely to the extent that you have any knowledge that is
23 responsive to the question?

24 A. As long as it's not any of the privileged
25 information that Mr. Beatty just related to, yes.

1 Q. Would you please state your name for the record and
2 spell it for Mr. Blue so it's accurate?

3 A. April D. Ivy.

4 Q. And would you please state your address?

5 A.

6 Q. And your phone number?

7 A. Area code

8 Q. And what is your present position at the company?

9 A. I'm currently a manager in operations in charge of
10 the installation and maintenance center for South Dade.

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1 A. Not to my knowledge. It was not given to me that
2 way.

3 Q. Okay. Let me show it to you one more time.
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15 A. I was in a class in Fort Lauderdale and he beeped me
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17 Q. Physically beat you, B-E-A-T?

18 A. "Beeped, beeped."

19 MS. RICHARDSON: I'm sorry, I misheard.

20 MR. BEATTY: For the record, Southern Bell does
21 not engage in that kind of activity.

22 MS. RICHARDSON: I hope not. (Laughter)

23 A. He beeped me. I went to the phone. I called him.
24 He read it to me over the phone.
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I'm sorry, I

may have lost some of that in the ensuing conversation.

A. Correct.

A. Absolutely not.

A. Absolutely not.

Q. To your knowledge, does the company discipline employees who have performed their work properly?

MR. BEATTY: Objection. It's speculative.

MS. RICHARDSON: To your knowledge.

MR. BEATTY: Objection to form.

MS. RICHARDSON: To your knowledge.

1 MR. BEATTY: I object to the form. I object
2 also on the grounds of relevance.

3 MS. RICHARDSON: Ms. Ivy?

4 MR. BEATTY: You can respond.

5 A. I don't know of anything. I would have to -- No,
6 can't answer the question.

7 Q. (BY MS. RICHARDSON): As a manager have you ever
8 had the responsibility of disciplining any employee that you
9 supervised?

10 MR. BEATTY: Respond.

11 THE WITNESS: In what respect? For what
12 reason? Can you be more specific?

13 Q. (BY MS. RICHARDSON): For any reason, as part of
14 your supervisory--

15 A. Attendance.

16 Q. -- responsibility have you ever been called upon to
17 discipline someone that you supervised within the company?

18 A. Yes, management and nonmanagement.

19 Q. Okay.

20 A. For things like attendance, punctuality. Terminated
21 employee for drug abuse, those type of things. Yes, in my
22 career I've done that.

23 Q. Have you ever personally disciplined an employee who
24 has not been engaged in some kind of misconduct?

25 A. I don't understand the question.

1 Q. All right. Has there always been a specific reason
2 for the discipline you've administered?

3 A. Oh, absolutely.

4 Q. And the specific reason relates to the employee not
5 living up to the full --

6 A. Conditions of employment.

7 Q. -- responsibilities? Conditions of employment?

8 A. Correct.

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11 A. Not to my knowledge.

12 Q. So you've done nothing wrong and there has been no
13 reason to be disciplined, yet you were disciplined?

14 A. Correct.

15 Q. Do you know why, ma'am?

16 MR. BEATTY: Object. It's been asked and
17 answered now on three occasions.

18 If they need an answer again, you can answer it
19 again.

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A. Absolutely.

A. No.

Q. Just you and Mr. Rubin?

A. Not to my knowledge. Correct.

A. Not to my knowledge.

Q. Okay. Thank you.

Have you heard the term backing up the time used at all in reference to customer records, within the company?

A. Backing up time is a term I've heard, yes, many

1 times.

2 Q. In what context have you heard that?

3 MR. BEATTY: Before you answer this allow me to
4 object on the grounds that this witness has been
5 subject to a number of different interviews, and one
6 of which included a deposition I believe in -- in
7 Tallahassee, I believe, in which a lot of the subject
8 matter that pertains to this particular docket was
9 elicited.

10 For this witness to have to subject herself to
11 yet another such interview, another deposition, is, I
12 suggest to you, abuse on your part, and she should
13 not be subjected to this interview.

14 Having said that, of course, you will I'm sure
15 proceed in accordance with whatever dictates you feel
16 that you have, but I do hope in the process you'll
17 consider the fact that she has been through this
18 process on numerous occasions.

19 Q. (BY MS. RICHARDSON): Would you answer the question?

20 A. I'll give you an example of when someone might use
21 that term.

22 If during the night we had a central office failure
23 that occurred at 8:00 p.m. and that was restored at 8:45 p.m.
24 and all 500 of those customers were restored at 8:45 p.m., and
25 the maintenance center didn't open until 7:00 a.m. the

1 following day, the correct restoral date and time would be
2 used to say when those customers were restored back to
3 service. And a common term that was used was you need to back
4 up the time to the correct date and time the customers had
5 dial tone, which would be 8:45 p.m. rather than 7:00, 7:30,
6 8:00, 8:30, when it took us the time to close those trouble
7 reports out.

8 So the term was used to correctly determine when the
9 customer's date and time of his dial tone was restored to
10 their residence, their line. So that's what backing up the
11 time means to me.

12 Q. In your IMC experience, have you ever or do you have
13 any personal knowledge of maintenance administrators having to
14 call a manager to get permission to close out a trouble
15 report?

16 A. Not any direct knowledge that I have, no. I've
17 never heard an MA say I need permission to back up the trouble
18 report or close out a report, no, I don't have any.

19 Q. Have you ever had a manager tell their MAs to do
20 that?

21 A. Not that I've ever heard.

22 Q. Have you ever heard of anyone using the no access
23 code to stop the clock on an out of service trouble?

24 A. Have I ever heard of it?

25 Q. Yes.

1 A. The no access, there's two types of no access. One
2 is a no access where the customer premises cannot be obtained
3 through some force that the customer has to get a gate or
4 another utility has to let us in or their box is in another
5 customer's yard; that's a no access which is an NAO and that
6 stops the clock.

7 Or a no access which the customer also controls is
8 when he's not home, we knock on their door; and that doesn't
9 stop the clock.

10 So if you're asking me have I ever seen anything no
11 access that stopped the clock, the answer to the question is
12 yes.

13 Have I ever seen it abused for any reason? The
14 answer to the question is no.

15 Q. Do you know of any incidents of employees, excluding
16 out of service reports that are about to miss that 24-hour
17 commitment time, when the work was not actually yet completed?

18 A. No.

19 Q. Do you know of anyone recording an extension of a
20 commitment time without contacting the customer?

21 A. Extending a commitment time?

22 Q. Without contacting the customer.

23 A. In my capacity as an IMC staff manager, when I was
24 doing reviews, which I previously testified to, part of my
25 responsibility on doing standardization reviews was to find

1 errors in the closing out of any type of trouble report no
2 matter what the error was on it. And if any of those errors
3 were detected through my review, they were brought to the
4 manager's attention.

5 So if you're asking me if I detected anything like
6 that where it could have been someone new that needed to be
7 trained or a procedure had to be changed or a practice had
8 been changed and implementation wasn't carried out properly,
9 and through my staff function found this, yes, there were
10 cases, you know, of any of the things that you can probably
11 mention on an IMC review that I uncovered.

12 Did I uncover that it was an integrity issue or one
13 of someone doing it on purpose? Never uncovered anything like
14 that except for the one investigation that you know about.

15 Q. You stated, I believe
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20 MR. BEATTY: Objection. Objection to the
21 extent that the answer would cause this witness to
22 disclose information that she may have obtained from
23 the course and the substance of the investigation.
24 To the extent of course that she has personal
25 knowledge, then we have no objection.

1 THE WITNESS: I can't answer the question. I
2 don't know what exactly you want me to say.

3 Q. (BY MS. RICHARDSON): Okay. Let's start off with,
4 have you seen the company's internal investigation report?

5 A. Have I seen the company's-- Yes, I have seen
6 portions of it.

7 Q. You have seen portions of it. Have you discussed
8 any portion of the company's internal investigation report
9 with any other staff members --

10 A. No.

11 Q. -- within the company?

12 A. No.

13 Q. Not even with legal staff?

14 A. As a result of the investigation they've asked me
15 questions about it just like I have answered on public record
16 with you guys at the Public Service Commission and the office
17 of Public Counsel.

18 Q. What specific portions of the report have you seen?

19 MR. BEATTY: I would object on the grounds that
20 to answer that question causes her to reveal the
21 substance of the investigation, number one.

22 And number two, this information has already
23 been fully discussed in her prior deposition; and if
24 in fact this process is about good faith, if the
25 Office of Public Counsel here is proceeding in good

1 faith and not for some ulterior motive with regard to
2 this witness, then I request that you take a look at
3 the deposition that you already have on record and
4 that you do not repeat questions that appear in that
5 deposition unless there is some specific reason to do
6 so.

7 MS. RICHARDSON: Okay.

8 A. (BY MS. RICHARDSON): Ms. Ivy, let me be more
9 specific then. Outside of the deposition that we had in May,
10 where I distributed some confidential information related
11 to the company's internal investigation, have you seen any
12 other sections or portions of the company's internal
13 investigation?

14 MR. BEATY: Please limit your response for the
15 moment to yes or no.

16 A. No. I can only say no.

17 Q. (BY MS. RICHARDSON): Okay. Then leaving aside what
18 you saw in that deposition, and you just indicated you have no
19 other knowledge of the company's internal investigation--

20 A. (Nods yes)

21 Q. -- I want to go back to my other question.
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2 A. None. There was nothing that I would have done
3 differently from September of '87 to January of '89 any
4 differently as far as supervision.
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8 Q. Do you have any knowledge of any employees statusing
9 affecting service troubles with out of service troubles to
10 build a base, the 24-hour index base on out of service?

11 A. As I testified in Tallahassee, I had firsthand
12 knowledge of that, because it occurred in North Dade that
13 resulted in the termination of
14 So the answer to that question is yes.

15 Q. And you have no other knowledge?

16 A. No.

17 Q. Do you have any knowledge of any employee using an
18 employee code other than their own for statusing customer
19 reports?

20 A. No.

21 Q. Are you familiar with the 430 cause code?

22 A. Yes.

23 Q. And is that for flood?

24 A. Correct. It's a cause code that's used under the
25 cause code header of weather, and a 430 cause code is one of

1 those weather codes. You have others, ice, sleet, snow,
2 tornadoes, hurricanes. 430 is flood.

3 Q. What's the effect of putting a 430 code, entering a
4 430 code, on a customer report?

5 A. It indicates that there was a high level of water
6 for analysis.

7 If you want to find out what happened in a
8 particular month as to why your trouble report rate was high
9 and you had a bunch of 430s, it would indicate that you had
10 severe weather conditions during that 65 day period and that
11 was why your trouble report rate was high, because you had
12 severe weather conditions.

13 Q. Does a 430 code affect whether or not a customer
14 gets a rebate?

15 A. No, I don't believe it does.

16 Q. Does the 430 code affect whether or not that
17 particular report, if it was out over 24 hours, counts in that
18 95 percent index?

19 A. If you're talking about 11-A, which is the PSC
20 report that goes to the Public Service Commission, 430 cause
21 code is an excluded cause code.

22 Q. Do you recall contacting a Ms. Cherie Calvert in
23 October of 1990 regarding the use of 430 cause codes in your
24 area?

25 A. In October of 1990 I was an IMC staff manager and my

1 responsibility was to do analyzation, and it's very possible
2 that I did analyzation in that particular month and found the
3 430 cause code and contacted the IMC manager managers to ask
4 them what was going on. If there was a percentage higher over
5 what I would normally see, I would call them and ask them
6 about it, because that was my job.

7 Q. I'm going to show you a memo.

8 MS. RICHARDSON: And I guess, Mr. Beatty, I'm
9 going to show it to you first so if you have any
10 objections to the witness seeing it I'd like you to .

11 . . (Producing instrument)

12 MR. BEATTY: (Examining instrument).

13 THE WITNESS: (Examining instrument).

14 Q. (BY MS. RICHARDSON): Okay. You indicated that if
15 you found something with a 430 code that you would consult the
16 operational managers; and Miss Calvert has indicated to us
17 that that was the case, that you had called her. Do you--

18 MR. SCOLA: Excuse me. I just want the record
19 to reflect that the memo you showed her is from
20 Cherie Calvert to Ralph Mills, Shirley Paring, Chris
21 Phillips and a carbon copy to G. H. Lewis, and
22 nowhere in the memo is there any mention of April Ivy
23 having anything to do with preparing the memo or
24 discussing this matter with Cheri Calvert.

25 MR. BEATTY: I too would object to counsel's

1 characterization with regard to the information
2 contained in the memo. The memo speaks for itself,
3 if it speaks at all, on the issue that you attribute
4 to it.

5 Q. (BY MS. RICHARDSON): Having read the memo, do you
6 recall, can you think back, having contacted Miss Calvert
7 regarding this matter of the use of the 430 code?

8 A. The specific conversation with Cheri, no.

9 But again, if you remember as I stated earlier, as
10 an IMC staff manager that was my job. This was something that
11 went on commonly that I would run reports. I'm like the
12 Internal Affairs with the IMC; so I looked at them all the
13 time for different reasons trying to make sure that they
14 maintained the operating practices and procedures that were
15 implemented in the corporation.

16 So specifically talking to Cheri about that, I don't
17 remember.

18 Q. Okay. After having read this, do you recall the
19 events in question in this memo?

20 A. Vaguely I recall that we ran a report and found 430
21 used more than normal. It was a rainy month, October is
22 usually one of our last summer months. But specifically how
23 many, the events surrounding it, again this was something I
24 did all the time. I was checks and balances for the IMCs.
25 And if she said I called her, I'll have to go with that,

1 because I don't remember the conversation.

2 Q. Do you remember speaking to each of the managers
3 listed, Mr. Mills, Ms. Paring, Mr. Phillips, in relation to
4 this memo or a followup to the memo?

5 A. No, I had no contacts with any of those. This came
6 from Cheri, and I don't remember talking to any of those folks
7 about it.

8 Q. Do you remember taking up any information, maybe
9 through the mails from these people to you regarding the use
10 of the 430 code?

11 A. Through the what?

12 Q. On the use of the 430 code, do you remember having
13 them sending you any information on the use of the 430 code?

14 A. No, I don't recall anything of that. Again as my
15 staff job, I sent stuff to them; they usually didn't send it
16 back.

17 Q. Do you know whether any followup was done?

18 A. As part of the normal standardization reviews we
19 looked at, you know, disposition and cause codes; and I don't
20 remember it coming back up again, you know, after this
21 particular time. Again I don't remember too many events
22 surrounding it.

23 Q. Do you have any knowledge or information about
24 employees misusing the exclude codes on customer reports?

25 A. Misusing them?

1 Q. Yes.

2 Q. Let's say improperly using them?

3 A. Oh, no. Okay. Because again you got to keep
4 relating back to what I did.

5 Q. Yes.

6 A. There were cases where they used incorrect
7 disposition cause codes but they were training or practice
8 changes or implementation problems with understanding their
9 use of them. And did I uncover them? Yes. Did we correct
10 them? Yes.

11 Q. Do you know of any employee who has used any means,
12 any improper means, whatever, to build that out of service
13 base to meet the 95 percent index?

14 A. Again as I stated earlier, the only case that I had
15 uncovered was the one that resulted in disciplinary action.
16 That was obvious something was wrong. No other time, in my
17 tenure in the maintenance center.

18 Q. On that particular incident, do you know of any
19 employee who has falsified a customer repair record in any
20 manner?

21 A. I know of no time that a company employee falsified
22 a company record for an employee or a customer.

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Q. Outside of that prior testimony, have you heard of anyone since that time or know of anyone else?

A. No, other than the names that came out publicly that I did not know existed before; but no, I have no more knowledge than that.

Q. In 1989 were you involved in a corporate strategy review team?

A. In 1989 I was loaned to BellSouth to be part of a ten man corporate review team to review the three Bell operating companies to determine the next five years of our strategic plans, yes.

Q. Did your involvement, and within the time that you were involved with that, did part of that strategic review deal with handling customer repair records, reports and rebates at all?

A. Nothing like that. It was taking three Bell operating companies' strategic plans for the next five years and determining the corporate plans. That was all it was.

Q. Within that context, did you deal with force to load aspects, for instance reducing the number of employees and still maintaining present PSC indexes, for instance, with fewer employees to handle the job? Was that part of strategic review?

MR. BEATTY: Does that pertain to Florida or--

1 MS. RICHARDSON: Florida, yes. I'm looking at
2 Florida.

3 A. In part of the three Bell operating companies'
4 strategic plans there were downsizing plans, but none of them
5 specifically brought down to the level of the installation and
6 maintenance centers to say that we were going to downsize.
7 There was a corporate line for the next five years to
8 downsize, but it was never brought down to that lower a level.

9 Again we were trying to determine the path of the
10 corporation for the next five years and where we needed to go
11 in the telecommunications industry. And it was more global
12 and it dealt with information systems, whether to consolidate
13 the three companies, those types of issues, regulatory issues,
14 those kinds of things.

15 Q. (BY MS. RICHARDSON): Was one of the issues involved
16 sales and marketing for the nonregulated side of the company
17 in Florida?

18 A. Very small piece of it. Very small.

19 Q. Okay. Were any recommendations made in relation
20 to the nonregulated versus the regulated side in sales and
21 marketing?

22 MR. BEATTY: For the state of Florida?

23 MS. RICHARDSON: Yes.

24 A. No.

25 Q. (BY MS. RICHARDSON): In 1990 did you chair a

1 committee to relocate the North Dade IMC?

2 A. Yes, I did.

3 Q. Can you explain why the relocation was deemed
4 advisable or necessary?

5 MR. BEATTY: Objection on the grounds of
6 relevance. We have gone so far afield that it does
7 mockery to the docket in which we are currently
8 functioning.

9 MS. RICHARDSON: Go ahead.

10 A. The purpose of relocating the installation and
11 maintenance center in North Dade was a lease had expired in
12 the building that they were in and Ms. Eisenhower had to get
13 them out of that building and put them in a permanent
14 structure; and the course of direction was to put all the
15 maintenance centers in central offices so that in the event
16 there was a hurricane we'd have the IMCs on emergency power,
17 because they are an integral part of the network department.

18 And as a result to that we moved the North Dade IMC
19 to the Brentwood central office, and she asked me to spearhead
20 that move. And that's what it was.

21 Q. Did any downsizing occur because of that move?

22 A. No.

23 MR. BEATTY: Objection, relevancy.

24 MS. RICHARDSON: Okay, Ms. Ivy, I think I'm
25 through. No. Oh, I have one other question.

1 THE WITNESS: She always does. (Laughter)

2 Q. (BY MS. RICHARDSON): Have you ever reported anyone
3 for improperly handling customer records to internal company
4 investigators or internal company staff?

5 A. You'll have to explain to me what you mean reported.
6 I'm not sure I understand. If you're talking about

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8 MR. BEATTY: Matters to which she has already
9 testified.

10 A. Right-- then you know that I did, as a result of my
11 staff review.

12 Q. (BY MS. RICHARDSON): Other than those two
13 individuals, have you reported anyone else?

14 A. No.

15 Q. Do you know if anyone has ever reported you?

16 A. I'm a wonderful person, nobody could ever report me.
17 No, I have no knowledge of that. (Laughter)

18 MS. RICHARDSON: For the record, I agree you
19 are a wonderful person. Okay.

20 That is it. And I want to thank you for being
21 here and I appreciate your time again. The staff may
22 have one or two questions for you.

23 THE WITNESS: I knew that too.

24 BY MS. WILSON:

25 Q. Ms. Ivy, did you state that you have seen a portion

1 of company's internal investigation?

2 A. When I was in Tallahassee I saw four documents that
3 I had not seen before.

4 Q. Was that the only time that you saw--

5 A. My own deposition.

6 MR. BEATTY: Just -- okay.

7 Q. (BY MS. WILSON): Have you ever seen a summary of
8 the company's investigation?

9 MR. BEATTY: Just yes or no.

10 A. No.

11 Q. (BY MS. WILSON): You have not?

12 A. No.

13 BY MR. VINSON:

14 Q. Ms. Ivy, you mentioned performing reviews and so
15 forth as part of an IMC staff position?

16 A. Um-hum.

17 Q. That was as part of Mr. Taylor's organization?

18 A. Organization, correct.

19 Q. Could you describe a little bit about how those
20 reviews were scheduled, what determined when one was done at a
21 particular maintenance center?

22 A. They were done quarterly, that's basically how they
23 tried to set them up.

24 At the same time we had the operational reviews
25 there were technical performance reviews going on at the same

1 time. So what I tried to do was time them with the technical
2 performance reviews so that we went in at the same time and
3 not disrupt the workplace more than once, so we tried to do
4 them every quarter. If there were findings, then we'd go back
5 in sixty days and make sure that the training was done and the
6 new implementation was done and things like that. But most
7 of the time they were every quarter.

8 Q. Which ones were quarterly, what types?

9 A. Operational. IMC operational reviews is what I
10 conducted quarterly.

11 Q. Over what period of time that you're familiar with
12 were those conducted quarterly?

13 A. Let's see, I went to the staff in January of 1989.
14 And they were done from the time I came there until I left in
15 May of '91, some type of operational review was done by my
16 staff pretty much on a quarterly basis, which I believe you
17 have copies of.

18 Q. And technical performance reviews, how often were
19 they?

20 A. Mr. Crittendon, our state Vice President, held those
21 and usually they were once or twice a year. That was the
22 opportunity he had to come in and review all the departments,
23 engineering, construction, outside plants, installation and
24 maintenance. And they were lined up a little bit differently.

25 Q. The quarterly reviews that you're referring to would

1 include, for example, the North Dade review in August of '90,
2 that involved--

3 A. Yes.

4 Q. That involved

5 A. Correct.

6 Q. That's one of the ones that was quarterly?

7 A. Right. Those were one of the reviews that I
8 conducted in 1990. And I did all the IMCs that year.

9 Q. You personally did them all that year? Or the
10 staff?

11 A. My people, I should say. I'm a little possessive.
12 I had five staff members that were subject matter experts that
13 reported to me that conducted the review and I just
14 spearheaded it. You know how managers are.

15 Q. Now, when you say all the IMCs, that's not
16 statewide?

17 A. No, that's just South Florida.

18 Q. Do you know if an analogous effort went on in the
19 North Florida area?

20 A. I believe reviews were handled all over the state
21 the same way because T.C. Taylor was the Operations Manager.
22 I have knowledge that the southeast folks pretty much did the
23 same thing.

24 Q. But he would have had an analogous manager to you?

25 A. Yes.

1 Q. For north?

2 A. Correct. There were three of us.

3 Q. What was the name of the north Florida--

4 A. Jerry Moore.

5 Q. And the southeast?

6 A. Paul White. Those were my two counterparts.

7 Q. Were these types of reviews ever scheduled more

8 frequently when a problem arose or some specific area needed
9 investigation?

10 A. As I stated earlier, when we went in and I had a
11 yardstick of what I determined was strong, weak; and if there
12 were areas that I felt like the IMC needed additional training
13 on, in those areas that I felt were weak, I would send the
14 subject matter expert in, go over whatever operational changes
15 that I felt needed to be trained on, and then I'd come back
16 either 30 or 60 days later to make sure that everything had
17 sunk in and the MAs and the managers were doing everything per
18 the book.

19 MR. VINSON: Those are all the questions that
20 I have. Thank you.

21 MR. GREER: No questions.

22 MR. BEATTY: That's it. Thank you very much.

23 (Thereupon the deposition was concluded at 2:00
24 p.m.)

25

1 STATE OF FLORIDA)
: ss. CERTIFICATE OF REPORTER
2 COUNTY OF DADE)

3
4 I, JOHN J. BLUE, Registered Professional Reporter,
Certified Shorthand Reporter and Notary Public in and for the
5 State of Florida at Large,

6 DO HEREBY CERTIFY that the deposition of APRIL IVY,
a witness called by the Citizens of the State of Florida in
7 the above-captioned matter, Docket No. 910163-TL, was heard at
the time and place herein stated; that the witness was by me
8 first sworn to tell the truth; it is further

9 CERTIFIED I reported in shorthand the said
deposition; that the same has been transcribed under my direct
10 supervision, and that this transcript, consisting of 32 pages,
constitutes a true and accurate transcription of my notes of
11 said deposition; it is further

12 CERTIFIED that I am neither of counsel nor related
to the parties in said cause and have no interest, financial
13 or otherwise, in the outcome of this docket.

14
15 IN WITNESS WHEREOF, I have herunto set my hand at
Miami, Dade County, Florida, this 2nd day of October, 1993.
16

17 

18 JOHN J. BLUE
Registered Professional Reporter
19 Certified Shorthand Reporter and
Notary Public
20 In and for the State of Florida At Large
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21 25 Southeast 2nd Avenue
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22 (305) 371-6228

23
24 My Notary Commission Expires:

25 December 21, 1993