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BEFORE THE PUBLIC SERVICE COMMISSION

920260-TV

| | | |
|---------------------------------|---|------------------------|
| In re: Show Cause proceeding |) | Docket No. 900960-TL |
| against Southern Bell Telephone |) | |
| and Telegraph Company for |) | Filed: August 16, 1993 |
| misbilling customers |) | |
| <hr/> | | |

STATE OF FLORIDA)
COUNTY OF DUVAL)

Deposition of AIDA STEWART, taken pursuant to Notice of Taking Deposition, on Monday, August 30, 1993, at 301 West Bay Street, Southern Bell Tower, 20th Floor, Conference Room C, commencing at 11:00 a.m., as recorded by Patricia H. Vierengel, CSR, RPR and Notary Public in and for the State of Florida at Large.

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A P P E A R A N C E S (Continued)

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ALSO PRESENT: Raymond E. Poucher
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I N D E X

WITNESS:

AIDA STEWART

DIRECT EXAMINATION BY:

MR. BECK.....Pg. 7

MR. VINSON.....Pg. 15

N O E X H I B I T S

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S T I P U L A T I O N

IT IS STIPULATED that this deposition was taken pursuant to notice in accordance with the applicable Florida Rules of Civil Procedure; that objections, except as to the form of the question, are reserved until hearing in this cause; and that the reading and signing was not waived.

IT IS ALSO STIPULATED that any off-the-record conversations are with the consent of the deponent.

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AIDA STEWART,

having been produced and first duly sworn as witness herein,
testified as follows:

DIRECT EXAMINATION

BY MR. BECK:

Q Ms. Stewart, my name is Charlie Beck and I'm with
the Office of Public Counsel. I'm going to be starting off
on the questions today. There may be others after I have
finished.

Let me tell you right up front that I'm not going to
ask you to name any other member of the union as far as what
somebody did or didn't do. That's not our purpose here to
try to get anybody in trouble. We are interested in the
quality of service the customerd receive and some aspects of
what you face on the job. Okay?

A (Nods Head).

Q Could you please state your name?

A Aida Stewart.

Q Are you employed by Southern Bell?

A Yes.

Q What job do you hold with the company?

A Service representative.

Q Is that here in Jacksonville?

A Yes. Um-ha. (Affirmative Response).

Q About how long have you held that position?

1 A About 18 years.

2 Q And has all of that time been in Jacksonville?

3 A No. I was in Denver for a while.

4 Q What time period were you in Denver?

5 A It was some time ago. I can't remember exactly
6 when it was.

7 Q Let me ask this: About how long have you been in
8 Jacksonville?

9 A Since '79.

10 Q Could you just describe briefly what your job
11 entails as a service representative?

12 A I work in the business office. I take calls from
13 customers in reference to billing, changes in their service
14 in service, transfer of services.

15 Q Who is currently your supervisor?

16 A Renee Campbell.

17 Q Are you appraised, or does the company have an
18 appraisal system where they give you an appraisal on a
19 regular basis?

20 A Yes. Um-ha. (Affirmative Response).

21 Q How often does that occur?

22 A It's monthly.

23 Q Who does the appraisal?

24 A My supervisor.

25 Q And are you informed about the results of the

1 appraisal?

2 A Yes. Um-ha. (Affirmative Response).

3 Q What are the bases, or what does the company base
4 their appraisal on?

5 A Whether or not you handle your calls
6 satisfactorily according to their standards.

7 Q Okay. And what are some of the standards that
8 you're familiar with?

9 A Responding to the opening statement, answering all
10 questions correctly, doing whatever they ask you to do, and
11 asking whether or not -- asking the questions to decide
12 whether or not the customer needs a service, or would
13 benefit from a service that we have to offer.

14 Q Are there any quotas or objectives that are set
15 for you?

16 A Yes.

17 Q What are they?

18 A To tell you exactly, I don't know. I mean, I
19 don't know the numbers and all of that.

20 Q Okay. Are appraisals discussed in open meetings
21 with other people?

22 A No.

23 Q It's all just you and the supervisor together --

24 A Yes.

25 Q -- discussing that?

1 A Um-ha. (Affirmative Response).

2 Q Is sales part of your appraisal?

3 A Yes.

4 Q How would you describe the importance of sales in
5 your appraisal?

6 A It's equally as important as everything else.

7 Q Are there -- Are there a certain number of sales
8 or dollar amounts that you're supposed to bring in every
9 month?

10 A Yes.

11 Q Off the top of your head, you're not aware of what
12 the numbers are, though?

13 A No.

14 Q You mentioned earlier that you are appraised on
15 the accuracy of what you say to the customer; is that right?

16 A Yes. Um-ha. (Affirmative Response).

17 Q Does that include like full disclosure of optional
18 services?

19 A Yes.

20 Q How does the company appraise the quality of the
21 service you're providing as opposed to the, you know, like
22 sales figures and quantity?

23 A I'm sorry?

24 Q How does the company evaluate the quality of your
25 service that you provide the customers?

1 A There is a form that they go by.

2 Q Do you ever have any trouble meeting the sales
3 objectives?

4 A Yes. Um-ha. (Affirmative Response).

5 Q Could you expand on that a bit?

6 MR. BEATTY: Well, I object to the form of the
7 question. It's ambiguous.

8 If you can respond, you're welcome to.

9 A What was the question again? I'm sorry.

10 Q Have you ever had difficulty meeting the sales
11 objective?

12 A Yes.

13 Q In what way?

14 A Whatever the quota was for satisfactory, I didn't
15 meet that.

16 Q Did the company take any action as a result of
17 that?

18

19

20

21 A No.

22 Q Has that happened only once?

23 A That I can remember, once. Um-ha. (Affirmative
24 Response).

25 Q Do you recall about when that was?

1 A In November.

2 Q Of what? Last year?

3 A '92.

4 Q Do you think an emphasis on sales hinders your
5 ability to give good service to customers? Is that your
6 opinion?

7 A No.

8 Q Do you think the customers like the sales approach
9 that the company uses?

10 A Do I think they like it?

11 Q Yeah.

12 MR. BEATTY: If you know.

13 A I don't know.

14 Q Have you ever had complaints from customers about
15 the sales approach trying to sell services?

16 A Complaints? What do you mean "complaints"? Like,

17 --

18 Q For example, did anybody ever tell you, "Stop
19 trying to sell me services"?

20 A No.

21 Q Are you required to bridge on calls?

22 A Yes. Um-ha. (Affirmative Response).

23 Q Would you describe what bridging is?

24 A It's asking the customer's permission to ask them
25 a few questions to find out whether or not we have a service

1 that they don't have that they might be able to benefit
2 from.

3 Q Do you bridge on every contact from a customer?

4 A Do I?

5 Q Yes.

6 A No.

7 Q What types of calls do you not bridge on?

8 A If the customer is irate, or if it's a misdirected
9 call that should be in another department.

10 Q If a customer called in, for example, with a
11 problem on billing they felt they had, for example, a toll
12 call they didn't make on their phone on their bill, would
13 you attempt to bridge on a call like that?

14 A Yes.

15 Q Are you familiar with Southern Bell's ethics
16 program?

17 A Yes.

18 Q When did that begin, if you recall?

19 A I don't remember.

20 Q Is the technique the company uses for sales called
21 a customer centered sales approach?

22 A Yes.

23 Q Do you recall the assumptive sales approach that
24 preceded the current one, if you know?

25 A I don't remember. No.

1 Q Do you try to sell inside wire maintenance on
2 every call you get, other than the irate customer?

3 A Do I try and sell that?

4 Q Yes.

5 A Most of the people I talk to already have it, but,
6 you know, I explain -- if they don't have it then I explain
7 what it will do for them, and if they want it I put it on.

8 Q Is there any type of call where you would not
9 recommend inside wire maintenance, other than the irate
10 customer?

11 MR. BEATTY: Other than what she has already
12 explained?

13 BY MR. BECK:

14 Q I understand if somebody already has it you
15 wouldn't be trying to sell it to them.

16 A I'm sorry, what was your question again?

17 Q All right. You don't try to sell services to an
18 irate customer, do you?

19 A No.

20 Q Okay. Obviously you don't try to sell inside wire
21 maintenance to a customer that already has it. The question
22 is: Are there any types of calls other those where you
23 would not try to sell inside wire maintenance?

24 A No.

25 Q All right. Without naming any persons, do you

1 know of anyone who has ever added a service to a customer's
2 account without getting the customer's permission?

3 A No.

4 Q Do you know of anyone who has ever tried to sell
5 services to a customer who couldn't afford the services?

6 A Personally, no.

7 MR. BECK: That's all I have. There may be some
8 other questions, though.

9 BY MR. VINSON:

10 Q Mrs. Stewart, are you aware of any changes in the
11 appraisal process in appraising the performance of the
12 customer service representatives?

13 A Yeah. Well, I know it changes, but as far as the
14 exact changes, no.

15 Q Okay. So are you aware of the change in 1993
16 where the weight that's given to attaining the sales
17 objective has changed in the evaluation?

18 A Not really, no.

19 Q When was your last evaluation by your supervisor?

20 A About -- I think it was in March.

21 Q Okay. And those are conducted how often?

22 A When I say that, what I mean is -- when you say
23 appraisal, I mean it's done monthly, but there's a final.

24 Q Right.

25 A Okay. So what are you talking about?

1 Q Like the one in March, how frequently is that
2 done? Is that done annually or every six months?

3 A It was quarterly.

4 Q Quarterly?

5 A Um-ha. (Affirmative Response).

6 Q How often -- Let me rephrase that. Does your
7 manager ever talk to you about your progress at a certain
8 point towards meeting the sales objective?

9 A Yes. We -- yes.

10 Q How -- what -- How would that conversation go?
11 How would that come up?

12 A We have a sales report that comes out weekly.

13 Q Is that the 2011?

14 A Yes.

15 Q Okay. And would your manager discuss your 2011?

16 A She gives you a copy of it.

17 Q Would she just give you a copy, or would she talk
18 to you? How would --

19 A She might make a comment about it.

20 Q Okay. What types of comments do managers give, or
21 does your manager give you?

22 A There is a weekly objective and, you know, she may
23 comment as to whether or not you're meeting that, or whether
24 or not you didn't meet it, or something of that nature.

25 Q Okay. So she would -- You say she would comment

1 as to whether you made it. Does she ever provide you with
2 any encouragement, or warning, or anything other than just a
3 matter of fact you made it or you didn't?

4 A She encourages you, you know, if you didn't make
5 it to make it the next week.

6 Q What would be the outcome if a service rep. failed
7 to meet the annual sales objective at the review that we are
8 talking about rather than the quarterly reviews that we are
9 talking about? If you failed to meet your objective for
10 that entire quarter, what would be the outcome?

11 MR. BEATTY: Object to the form of the question.
12 It calls for speculation.

13 If you can answer that, you're welcome to.

14 Q Let me change the question.

15 Based on your own experience, have you ever failed to
16 meet the quarterly objective?

17 A Yes. Um-ha. (Affirmative Response).

18 Q Okay. And what was the outcome of that in your
19 evaluation?

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9 A Huh-ha. (Negative Response). No.

10 Q Are you aware of the centralized observing team
11 and its function?

12 A Yes.

13 Q Are customer service reps. aware when their center
14 is being monitored by the centralized observing team?

15 A No.

16 Q Do you have any concerns about the centralized
17 observing team, anything about that that bothers you?

18 A No.

19 Q Have you had any changes in the instructions that
20 you are given as to how to employ the customer centered
21 sales approach? Have any changes been given to you in your
22 instructions as to how to use that system?

23 A No.

24 MR. VINSON: Thank you. Those are the only
25 questions I have.

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MR. BEATTY: That's it.

(Witness excused).

(Whereupon, the deposition was concluded at 11:20 a.m.)

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AFFIDAVIT OF DEPONENT

This is to certify that I, AIDA STEWART, have read the foregoing transcript of my testimony, Pages 1 through 19, given on August 30, 1993, in Docket No. 900960-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

AIDA STEWART

SWORN to and subscribed before me this _____ day of _____, 1993.

Print name here:
Notary Public - State of Florida
My Commission No.:
My Commission expires:

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F L O R I D A)

:

CERTIFICATE OF OATH

COUNTY OF DUVAL)

I, the undersigned authority, certify that AIDA STEWART personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 20th day of October, 1993.

Patricia H. Vierengel

PATRICIA H. VIERENGEL

Notary Public - State of Florida

My Commission No.: CC296027

My Commission expires: 6/21/97

**PATRICIA H. VIERENGEL
NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES 6/21/97
COMM. # CC 296027**

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STATE OF FLORIDA)

CERTIFICATE OF REPORTER

COUNTY OF DUVAL)

I, PATRICIA H. VIERENGEL, Court Reporter, DO HEREBY CERTIFY that I was authorized to and did stenographically report the foregoing deposition of AIDA STEWART;

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

Patricia H. Vierengel
PATRICIA H. VIERENGEL, Court Reporter
Telephone No.: (904) 725-8657

STATE OF FLORIDA)

COUNTY OF DUVAL)

The foregoing certificate was acknowledged before me this 30th day of October, 1993, by PATRICIA H. VIERENGEL, who is personally known to me.

Herdean N. Gross
Print name:
Notary Public - State of Florida
My Commission No.:
My Commission expires:

