

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of
Investigation into the
integrity of SOUTHERN BELL
TELEPHONE AND TELEGRAPH
COMPANY'S repair service
activities and reports.

:
: DOCKET NO. 910163-TL
:
: *920260-TL*

DEPOSITION OF: SUSIE ROBINSON

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

PLACE: 666 N.W. 79th Avenue
Room 642
Miami, Florida

TIME: Commenced at 1:12 p.m.
Concluded at 1:50 p.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: SYDNEY C. SILVA, CSR, RPR
Official Commission Reporter

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19 Robinson.

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21

22 ALSO PRESENT:

23 STAN GREER, FPSC Division of Communications

24 CARL VINSON, FPSC Division of Research &

25 Regulatory Review

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I N D E X

1		
2		<u>Page No.</u>
3	ERRATA SHEET	5
4	STIPULATION	6
5	AFFIDAVIT OF DEPONENT	42
6	CERTIFICATE OF OATH	43
7	CERTIFICATE OF REPORTER	44

WITNESS

10 Name:

11 SUSIE ROBINSON

12	Examination by Ms. Richardson	6
	Examination by Mr. Anthony	39
13	Examination by Ms. Moscovitz	40

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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 reading and signing was not waived.

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

1 SUSIE ROBINSON

2 appeared as a witness and, after being first duly sworn
3 by the court reporter, testified as follows:

4 EXAMINATION

5 BY MS. RICHARDSON:

6 Q Would you please state your name and spell it
7 so that we'll have it correctly?

8 A Susie Robinson, S-U-S-I-E, R-O-B-I-N-S-O-N.

9 Q Thank you. And your address?

10 A

11 Q And your phone number?

12 A

13 Q Thank you. And what is your present
14 position?

15 A MA.

16 Q Maintenance administrator?

17 A Uh-huh.

18 Q And which IMC do you work in?

19 A South Dade.

20 Q South Dade? Can you give me your present
21 supervisor?

22 A Dotty Ketcham.

23 Q Is she a first level?

24 A Yes.

25 Q And who is your present second level

1 supervisor?

2 A April Ivy.

3 Q How long has Ms. -- well, let me start off
4 with how long have you been at South Dade?

5 A Since about '83.

6 Q Okay. Were you with the Company prior to
7 that?

8 A Yes.

9 Q When did you start with Southern Bell?

10 A '67.

11 Q 1967. I'm not asking that to date you, I
12 promise.

13 Have you been a maintenance administrator the
14 entire time that you were at South Dade?

15 A Yes.

16 Q And who was your first level supervisor
17 before Ms. Ketcham?

18 A Brenda Mitchell.

19 Q And approximately what dates was Brenda
20 Mitchell first level during your term? (Pause) No
21 idea? Late '80s, early '80s, mid '80s?

22 A Late '80s.

23 Q Okay. And do you know who was before
24 Ms. Mitchell?

25 A Jackie Griggs.

- 1 Q Jackie Griggs?
- 2 A Uh-huh.
- 3 Q Okay. And if you can, do you remember any
4 other first level supervisors that you have had at
5 South Dade?
- 6 A Cheryl Johnson.
- 7 Q Shirley, S-H-I-R-L-E-Y?
- 8 A No, Cheryl, C-H-E-R-Y-L.
- 9 Q And Johnson, J-O-H-N-S-O-N?
- 10 A Uh-huh.
- 11 Q Is there anyone else?
- 12 A Not by me, no. But I've worked for others.
- 13 Q You have worked for others? In what
14 capacity, as an MA?
- 15 A Well, no, like -- well, I guess you could say
16 MA. I worked in ICC for a while, for about two years.
- 17 Q Okay. I don't know what ICC is. What is
18 ICC?
- 19 A That's installation, service orders?
- 20 Q Oh, okay.
- 21 A Service orders.
- 22 Q Okay. And when was this?
- 23 A Let's see, now. I guess about four or five
24 years ago.
- 25 Q I'm sorry?

1 A Four or five years ago.

2 Q And who was your supervisor there?

3 A Well, I was only on loan there, but I was
4 only on loan for about two years. Jackie Griggs was
5 there then.

6 Q Okay. That was Jackie?

7 A Uh-huh.

8 Q All right. So I have Dotty Ketcham, Brenda
9 Mitchell, Jackie Griggs and Cheryl Johnson?

10 A Yeah.

11 Q Okay. Now, before Ms. Ivy, who was your
12 supervisor, second level?

13 A Calvert.

14 Q Cherie Calvert?

15 A Uh-huh.

16 Q And who was before Ms. Calvert?

17 A Perring, Shirley.

18 Q Shirley Perring? And do you remember any
19 other second level supervisors?

20 A Larry Rorrer and Booker.

21 Q Hampton Booker? Who is your operations
22 manager?

23 A Ted Rubin.

24 Q And do you know how long Mr. Rubin has been
25 your operations manager?

- 1 A For about two years, I think.
- 2 Q 1991?
- 3 A Yeah.
- 4 Q Do you know who was operations manager before
5 him?
- 6 A George Lewis.
- 7 Q And about how long did Mr. Lewis hold that
8 position?
- 9 A About three years, I think.
- 10 Q '87-'88?
- 11 A I think so.
- 12 Q And can you go back one step further than
13 Mr. Lewis at all?
- 14 A I can't think of his name. I can't think of
15 his name.
- 16 Q That's fine. And who is the general manager?
- 17 A I can't think of his name, either.
- 18 Q Okay. Presently, do you know who the general
19 manager is right now?
- 20 A Oh, I know her name, but I can't -- I can't
21 think of her name.
- 22 Q Is it Linda Isenhour?
- 23 A Linda, that's who it is.
- 24 Q Okay. Have you spoken to anyone other than
25 your attorney or Company attorneys about your

1 deposition here today?

2 A No.

3 Q Has anyone given you any assurance that what
4 you say here today will not be a cause for discipline
5 for you?

6 A Yes.

7 Q Okay. Has anyone spoken to you about the
8 possibility of criminal penalties if you don't tell the
9 truth here today?

10 A Yes.

11 Q Okay. Have you given a statement to a
12 Company investigator regarding trouble reports and
13 handling of trouble reports?

14 A Yes.

15 Q I'm sorry?

16 A Yes.

17 Q Who was present when you gave that statement?

18 A Uh-oh

19 Q If you don't remember names --

20 A I don't.

21 Q -- give me positions. Do you know what
22 position they held? Were they with the Company?

23 A Yeah. One was a lawyer, but I can't think of
24 the other one.

25 Q Was he just a manager or a union

1 representative?

2 A I went downtown.

3 Q You went downtown?

4 A Yes.

5 Q And you don't remember what position he held?

6 A I don't, no.

7 Q Okay. And was there just the three of you,
8 then, present in the room?

9 A Yes.

10 Q When you gave this statement, do you know if
11 it was tape-recorded?

12 MR. ANTHONY: I'm going to object to any
13 further questions about the investigation and the
14 statements, and instruct you, please, ma'am,
15 Ms. Robinson, not to answer any more questions about
16 that particular interview. It's privileged, and on
17 that basis, I'm asking you not to answer any further
18 questions.

19 Q (By Ms. Richardson) All right. And, then,
20 Ms. Robinson, for the record, are you refusing to
21 answer my questions based on Counsel's claim of
22 privilege, "yes," or "no?"

23 MS. MOSCOWITZ: She's been instructed not to
24 answer.

25 MS. RICHARDSON: But he can't testify, she

1 does. I need to know on the record if she's refusing to
2 answer my question.

3 MS. MOSCOWITZ: She's following an
4 instruction. Answer if you're going to follow the
5 instruction that Counsel has given you, counsel for the
6 Company?

7 WITNESS ROBINSON: Should I?

8 MS. MOSCOWITZ: Yes, you should.

9 WITNESS ROBINSON: Yes.

10 MS. RICHARDSON: That's all I'm asking.

11 MS. MOSCOWITZ: Okay.

12 Q (By Ms. Richardson) All right.

13 Ms. Robinson, can you briefly explain to me what your
14 duties are as a maintenance administrator? What do you
15 do?

16 A Now?

17 Q Uh-huh.

18 A I'm dispatching STs now. That's what I'm
19 doing now.

20 Q Okay. So a trouble comes in and you decide
21 it has to go outside for repair, so you send it to --

22 A This is after that part has been done.

23 Q Okay, then explain.

24 A See, I've had -- in the last, since I have
25 been in the maintenance center, I've had about four or

1 five different jobs.

2 Q Okay.

3 A For the last -- well, after Andrew, I went
4 back to DTAG for a while.

5 Q That's D-T-A-G?

6 A Uh-huh.

7 Q Dial tone assistant group?

8 A Dial tone assistant group. And then I went
9 -- I'm in the back with two foremen where we dispatch
10 the guys, only, just dispatch. And then right before
11 that for about a year-and-a-half I was doing that. And
12 then about two years -- the next two years, I was on
13 the bridge dispatching to cable guys only. And then
14 two years before that I was dial tone assistant group,
15 DTAG.

16 Q I'm sorry, dial tone --

17 A Assistant group.

18 MS. MOSCOWITZ: That's downtown, right?

19 WITNESS ROBINSON: No, just in the office.

20 Q (By Ms. Richardson) Dial tone --

21 A Assistant group.

22 Q Dial tone assistant group.

23 A Yeah.

24 Q Okay.

25 A And then I was in special circuit. And with

1 the screening, that's screening the troubles and
2 things, I think I've had about -- doing that for about
3 maybe two years, two-and-a-half years. Just steady
4 that's over ten years.

5 Q Okay. And what period of time were you
6 screening, just generally? I mean, was it early '80s?

7 A Early '80s.

8 Q Early '80s. All right. And what time were
9 you working the bridge doing cable dispatch?

10 A That, let me see, that was about two years
11 ago.

12 Q 1990?

13 A It's when the investigation -- when I went
14 downtown, I was doing the bridge then, and I had been
15 doing it about a year.

16 Q So '90-'91?

17 A Yeah, 1991 and part of '92.

18 Q And part of '92. All right. And what about
19 when you did special circuits, when were you doing
20 that?

21 A Special circuits, I did that right before I
22 went to the bridge, for about a year to six months.

23 Q '89?

24 A '89.

25 Q Somewhere in there?

1 A Uh-huh.

2 Q Okay. All right, let me start with your
3 screening activities back in the early '80s. Was part
4 of your screening duties to determine whether or not a
5 trouble report that had been phoned in was to be
6 out-of-service or not out-of-service?

7 A Yes.

8 Q How did you determine when it was
9 out-of-service?

10 A VER codes for --

11 Q The V-E-R, VER code?

12 A Yeah, or the customer.

13 Q Or the customer.

14 A If you can get ahold of the customer.

15 Q All right. And what kinds of things would
16 the customer have to tell you about his service in
17 order for you to understand that it was out of service?

18 A That he can't be called, his phone was dead,
19 he can't call out, that type of thing.

20 Q All right. And at what point in the
21 screening would you determine -- let me rephrase this.

22 Were the out-of-service statusing done at the
23 beginning of the report or were they pretty much done
24 at the end of the report on closeout?

25 A The beginning.

1 Q Okay. Was that done by the mechanized
2 analysis testing system or done by the maintenance
3 administrator in the screening process?

4 A It was both.

5 Q Okay. You said VER code, is that a test, a
6 mechanized test?

7 A It's a test.

8 Q Were there any points in time when you were
9 instructed not to status out-of-service today?

10 A Yes.

11 Q Can you tell me when?

12 A I can't give you a date.

13 Q Was it when you were screening?

14 A Uh-huh.

15 Q Working as a screening maintenance administrator?

16 A Uh-huh.

17 Q Do you know who your manager was at that
18 time?

19 A You mean my second level?

20 Q Yeah.

21 A

22 Q That was Do you happen to know
23 who your first level was at that time?

24 A I think it was -- oh, I left off one, too.

25 I forgot about her.

1 Q Okay. And was either a first or a
2 second level?

3 A First.

4 Q She was a first level. Okay. Was she the
5 first level at the time that you were screening?

6 A Yes.

7 Q These instructions not to status
8 out-of-service today, how did you get those
9 instructions?

10 A Well, see, I was working kind of -- I would
11 come into work about 8:30 or 9:00. And we have a neon
12 sign in the office, and the few times that it was up
13 there --

14 Q Okay. When you say "a neon sign," is that
15 one of those little lights that go on and off?

16 A Light, and that tells you what to do and not
17 to do for that day.

18 Q A little lighted message was scrolled across
19 that screen?

20 A Uh-huh.

21 Q And you would read it?

22 A Uh-huh.

23 Q Do you know who put the message up there?

24 A I was not there, no.

25 Q Would it have been a manager that did that

1 message?

2 A They are the only ones that uses it.

3 Q Okay. Do you know if other maintenance
4 administrators followed those instructions?

5 MS. MOSCOWITZ: Objection.

6 MS. RICHARDSON: You can still answer the
7 question. She's objecting for the record.

8 MS. MOSCOWITZ: If you know what other people
9 did.

10 WITNESS ROBINSON: No, I don't.

11 Q (By Ms. Richardson) Okay. Did you talk to
12 other people about those instructions?

13 A No.

14 Q Okay. Did you follow those instructions?

15 A Yes.

16 Q At the time that you followed those
17 instructions, did you have any opinion as to whether
18 they were proper or improper?

19 A No.

20 Q Did you feel -- (Pause) At any time when you
21 were following the instructions not to status
22 out-of-service today, did you ever question a manager
23 or supervisor about those instructions?

24 A No, I just thought it was Company policy.
25 No, I didn't.

1 Q Okay. Were you ever given instructions to
2 not status out-of-service up front, wait and status
3 out-of-service at closeout?

4 A No.

5 Q Are you familiar with a Company requirement
6 that out-of-service reports be cleared within 24 hours
7 at least 95% of the time?

8 A Now, I am.

9 Q All right. When were you made aware of that
10 Company requirement?

11 A A couple years ago, I guess.

12 Q '90, '91?

13 A '89, '90, somewhere along in there.

14 Q And how were you made aware of that requirement?

15 A Uh, who was my supervisor then? I don't
16 remember.

17 Q Was it something that --

18 A Something came up. I just don't remember who
19 it was.

20 Q Was it in a meeting?

21 A I don't remember. I really don't.

22 Q Okay.

23 A But all of it started falling into place, but
24 I don't remember.

25 Q When you were getting the instructions not to

1 status out-of-service today, do you know whether or not
2 it had any effect on the out-of-service-over-24 index?

3 A I didn't then, no.

4 Q Do you know that now?

5 A Yes.

6 Q Do you know now what effect it would have?

7 A Yes.

8 Q Can you explain it to me?

9 A You mean the 24-hour?

10 Q Uh-huh.

11 A It means the customer would not get their
12 rebate.

13 Q Okay. So it's your understanding, then, that
14 if an out-of-service report is not cleared within 24
15 hours that a customer is due some kind of rebate or
16 credit on his bill?

17 A Yes.

18 Q Okay. Do you know whether or not not
19 statusing out-of-service would help the Company meet
20 that out-of-service-over-24-hour index, so that they
21 wouldn't have any misses?

22 MS. MOSCOWITZ: Objection, you're mixing now
23 and then. She told you now she understands that a
24 customer gets a rebate. You didn't ask her whether she
25 understood it then.

1 MS. RICHARDSON: Okay. I'm not talking
2 rebate right now. I'm on to something different. So
3 let me make it clear if I can.

4 Q (By Ms. Richardson) I'm back to the
5 requirement that out-of-service reports be cleared
6 within 24 hours at least 95% of the time. Okay?
7 That's where I am now.

8 Are you aware that the Public Service
9 Commission requires the Company to repair
10 out-of-service reports within 24 hours at least 95% of
11 the time?

12 A Yeah, I understand now.

13 Q Understand now?

14 A Uh-huh.

15 Q And did you understand, at about the same
16 time, you understand the Company required it, '89-'90,
17 I believe you said?

18 A The Company?

19 Q Okay. I made two distinctions, and I'm
20 confusing you and I don't want to do that.

21 A Yeah, I'm confused.

22 Q Okay. I don't want to confuse you. Let's
23 just go with the one standard, out-of-service-over-24
24 should be cleared within 24 hours at least 95% of the
25 time?

1 A Right.

2 Q Have you heard the term "building the base"?

3 A Yes.

4 Q Okay. And how have you heard those words
5 used?

6 A Well, if a report came in and it tests okay,
7 talk to the customer and it's okay, since we was going
8 to close it out, just go ahead and status it
9 out-of-service.

10 Q All right. And your understanding is that
11 would build the base of out-of-services?

12 A I didn't understand what that meant.

13 Q Do you understand it now?

14 A I understand it now, yes.

15 Q Okay. And your present understanding, then,
16 of building the base is --

17 A I thought it just was a procedure or
18 something, I didn't know.

19 Q Okay. Do you know whether changing test-OKs
20 to out-of-services on closeout would help the Company
21 meet that out-of-service-over-24-hours index?

22 A No.

23 Q Have you heard of any other ways of building
24 the base other than the test-OK?

25 A No.

1 Q Are you familiar with the no-access code?

2 A Yes.

3 Q Can you tell me what a no-access code does?

4 Or what does it mean?

5 A To me?

6 Q Uh-huh.

7 A If a guy goes out on a trouble and the
8 customer is not home, they put it in no-access file.
9 And at that time, we would wait three or four days and
10 then close it out if the customer did not call back.

11 Q Okay. Now, on an out-of-service report,
12 would the no-access have any effect on whether or not
13 the Company met that out-of-service-over-24-hour index?

14 A No, I don't understand that. But we did meet
15 the 24-hour, didn't we? We went out there and the guy
16 put it in no-access. Is that what you're talking
17 about?

18 Q Yes.

19 A Okay.

20 Q We're closing in on it. And, please, if you
21 don't understand the question, you're free to work with
22 it like you are, tell me you don't understand it, you
23 want me to rephrase it. You need to feel comfortable
24 with your answers to my questions. I'm happy to try to
25 rephrase and get some clarity, that's fine.

1 Now, on the no-accesses, do you know if that
2 stopped that 24-hour clock so that the clock didn't
3 keep ticking down toward 24 hours --

4 A Yeah, it stopped the clock, yes.

5 Q Okay. So it stopped the clock?

6 A Right.

7 Q Do you, in terms of your dispatching now, you
8 said you have been dispatching since 1993. You're
9 presently doing that?

10 A Yeah.

11 Q And about how long have you been dispatching?

12 A Off and on.

13 Q Throughout from '83 to '93?

14 A Yeah, off and on.

15 Q Throughout the ten years?

16 A Yeah, off and on, yeah.

17 Q Okay. Prior to 1991, I want you to go back.
18 When you were dispatching, did you ever have an ST tell
19 you he no-accessed the trouble when he actually had
20 never visited the premises?

21 A No.

22 Q In your experience, have you ever had a
23 no-access status applied to a trouble report when no
24 dispatch was made?

25 A No.

- 1 Q Have you ever had a cable no-access?
- 2 A No.
- 3 Q Okay. Do you know of anyone who has
- 4 no-accessed reports in order just to stop the clock?
- 5 A No.
- 6 Q Have you ever heard of that being done?
- 7 A No.
- 8 Q Has anyone ever instructed you to do that?
- 9 A No.
- 10 Q Have you heard the words "backing up time"?
- 11 A Backing up time, yes.
- 12 Q All right. And what does that mean to you?
- 13 A Meet the commitment.
- 14 Q Okay. And what is a commitment?
- 15 A The appointment time that we give the customer.
- 16 Q That his trouble will be fixed?
- 17 A Will be cleared.
- 18 Q Will be cleared?
- 19 A Will be fixed, right.
- 20 Q Okay. Were you ever given any instructions
- 21 to back up the time?
- 22 A Once.
- 23 Q Once?
- 24 A I got a memo on one.
- 25 Q From?

1 A Huh?

2 Q Did you say you got a memo from somebody?

3 And who did you receive the memo from?

4 A Dottie Ketchum.

5 Q Dottie Ketchum. And do you remember what the
6 memo said?

7 A Failure to follow instructions.

8 Q Was it a discipline or reprimand to you?

9 A No, it was -- I guess it was more like
10 letting me know that I'm not supposed to do that.

11 Q That you were not supposed to back up the
12 time?

13 MS. MOSCOWITZ: Huh-uh.

14 MS. RICHARDSON: I don't understand.

15 MS. MOSCOWITZ: Why don't you ask her what
16 happened and let her tell you, rather than leading and
17 leading and leading and you're leading her down other
18 paths?

19 MS. RICHARDSON: That's fine.

20 Q (By Ms. Richardson) Go ahead and explain to
21 me what happened.

22 A Okay. This was a few years ago. I was on
23 DTAG at the time, and they needed some help in closing
24 something out. So they gave me the codes and gave me
25 the time and told me to close them out. And there was

1 one that I missed. And I got a memo, because I didn't
2 back the time up to that particular -- the time that
3 they had given me.

4 Q Okay. Now I have some questions so that I
5 can get clear. Are you through? I mean, I don't want
6 to cut you off.

7 A Go ahead.

8 Q Okay. At that time, you were in DTAG, so
9 this would be around Hurricane Andrew?

10 A No, no, no. I have been in DTAG three times
11 since then.

12 Q All right. At what time?

13 A This was probably '90. Probably '90, '89,
14 '90.

15 Q All right. And this is the dial tone
16 assistance group?

17 A Uh-huh.

18 Q And what were the telephone numbers that were
19 given you? Were those out-of-service reports?

20 MS. MOSCOWITZ: No. She was called back, she
21 told you, to help over with the screening. She didn't
22 do it as part of DTAG, right?

23 WITNESS ROBINSON: No. They took me off.
24 There was a big central office failure, and I was
25 closing it out; and they gave me the times to close

1 out, gave me the time to close the failure out. And I
2 was closing the reports out and I missed one.

3 Q Okay. Central office failure for South Dade?

4 A Yes.

5 Q About how many telephone numbers were you
6 given?

7 A Oh, probable, about 100, I guess.

8 Q Okay. And were all of these out-of-service
9 reports?

10 A Yes.

11 Q Were the close-out times the same for all 100
12 reports?

13 A Yes, they said they had fixed it in the
14 central office, yes.

15 Q Were these reports the time that you were
16 given under 24 hours? (Pause)

17 A I can't remember. All I know is that they
18 just gave me a bunch of troubles and told me to close
19 them out, gave me the time, and that's what I did.

20 Q On the one that you missed, did you miss
21 closing it altogether or just missed the time?

22 A I missed the time. I closed it out, but I
23 just missed the time.

24 Q And so when you closed it out, what time did
25 it end up being closed out?

1 A Probably the day that I did it.

2 Q Okay. Would that one have gone out of
3 service over 24 hours, then?

4 MR. ANTHONY: I'm going to object to the
5 question. Was your question was it actually out of
6 service more than 24 hours or would the record reflect
7 it was out of service more than 24 hours?

8 Q (By Ms. Richardson) Well, let's try it.

9 Do you recall whether or not the time that
10 you closed that particular one out made that an
11 out-of-service-over-24-hours trouble?

12 A I don't think so.

13 Q On these 100 central office failures, do you
14 know if the close-out time that you were given was the
15 accurate time when these troubles were actually fixed?

16 A I think so, yes.

17 Q You believe it to be?

18 A Yes.

19 Q Let me ask you -- well, do you know of any
20 other incidence of backing up the time to show an
21 out-of-service trouble completed within 24 hours?

22 A I don't, no.

23 Q All right. Let me phrase it one other way.
24 Do you know of anyone who has closed an out-of-service
25 trouble that has been out-of-service for more than 24

1 hours, backed up that time to show that it was closed
2 less than 24 hours?

3 A No, I don't.

4 Q Have you ever been instructed to do that on a
5 trouble report?

6 A No. Not directly, no.

7 Q "Not directly," but you may have been
8 indirectly?

9 A Well, you hear rumors.

10 Q Okay. What have you heard?

11 A You know how people talk in the lounge and
12 stuff.

13 Q And what have you heard?

14 A I heard -- well, I don't remember who said,
15 somebody was just generally talking that they had.

16 Q That they personally had done that?

17 A No, not personally, they had heard something
18 that's --

19 Q Do you know if it was in South Dade that this
20 was reported to have been done?

21 A No, it was just conversation in the lounge.

22 Q Did you tell me that you would back up the
23 times to meet the commitment?

24 A Yeah.

25 Q Do you know if backing up the time to meet

1 the commitment would have any effect on the
2 out-of-service-over-24-hour index?

3 A No.

4 Q You don't know if it would affect that at
5 all?

6 A No.

7 Q Okay. Are you familiar with disposition and
8 cause codes?

9 A A little, yes.

10 Q Can you explain to me just generally what a
11 disposition and a cause code is?

12 A Disposition is exactly what was wrong with
13 the trouble report or whatever the guy did or whatever.
14 And the cause code is whatever caused the problem.

15 Q All right. Do you know whether or not any
16 certain disposition and cause codes would exempt an
17 out-of-service report from being counted against the
18 Company in that out-of-service-over-24-hour index?

19 A No.

20 Q Has anyone ever stressed with you the use of
21 certain disposition and cause codes on out-of-service
22 reports?

23 A No. (Pause)

24 Q Let's try specific cause codes. Let's take,
25 for example, customer action code. You're familiar

1 with a customer action cause code?

2 A Uh-huh.

3 Q Do you know if you put down a customer action
4 cause code whether that out-of-service report would be
5 exempted from the 24-hour index?

6 A No.

7 Q In other words, the Company wouldn't be
8 blamed for missing it because it was customer action;
9 do you know whether or not that would occur?

10 A No.

11 Q What about weather codes, like a flood or
12 Hurricane Andrew, would the Company be blamed for not
13 getting a trouble repaired if it was caused by a
14 hurricane?

15 A I guess not.

16 Q But you're not sure?

17 A No. I'm just, hurricanes are something that
18 you can't control.

19 Q Okay. Do you know what it is to exclude a
20 report?

21 A Yeah.

22 Q What happens when you exclude a report?

23 A It doesn't exist. I mean, it doesn't appear
24 anywhere.

25 Q Okay. Under company practices, what is your

1 understanding of when it is proper to exclude a report?

2 A Wrong number reported or -- that's about it,
3 wrong number reported.

4 Q Okay.

5 A And then there are times that a customer will
6 call in and say, "Cancel the report," something like
7 that.

8 Q Okay. In your experience, have you ever
9 excluded an out-of-service report?

10 A No.

11 Q Have you ever had instructions to exclude
12 out-of-service reports?

13 A No.

14 Q Do you know of anyone who has ever done that?

15 A No, I don't.

16 Q Do you know if excluding the report would
17 have any effect on that out-of-service-over-24-hour
18 index?

19 A I would say not, but --

20 Q If a report is excluded, is it possible to go
21 back and find it at some point? Is a history of it
22 kept anywhere?

23 A Yeah, you can pull up a history on it.

24 Q And find out that it had been excluded?

25 A Yes.

1 Q Okay. When you backed up the time to meet
2 the commitment, was there a procedure for doing that?

3 A What now?

4 Q When you pulled up the trouble report on the
5 screen, how would you physically back up the time,
6 enter an earlier time in the computer?

7 A How would you do it?

8 Q Yeah. Would the computer accept an earlier
9 time or would it say, "I'm sorry, it's 1:00 now, you
10 can't put in noon"?

11 A Yeah, it would accept it.

12 Q It would?

13 A Uh-huh.

14 Q Okay. And when you put it on the screen with
15 the trouble report -- my understanding of the trouble
16 report is it starts with the customer's name, address
17 and phone number at the top? Is that correct?

18 A Uh-huh, and the time they reported the
19 trouble.

20 Q All right. And then we have a commitment
21 time in there somewhere at the beginning that says
22 we're going to fix it by a certain time?

23 A Uh-huh.

24 Q And then we have a screening line that says
25 you screened it and the test shows it's either

1 out-of-service or not?

2 A Uh-huh.

3 Q All right. And then we get down toward the
4 bottom, after the work has been done, and we have a
5 clearing line, is that correct?

6 A Yes.

7 Q All right. When you backed up the time to
8 meet the commitment, did you back it up at the clearing
9 line?

10 MS. MOSCOWITZ: If you don't understand, you
11 don't have to answer. You can ask her to clarify the
12 question.

13 WITNESS ROBINSON: I'm not.

14 MS. MOSCOWITZ: She's not understanding you.

15 WITNESS ROBINSON: When I'm backing up the
16 time?

17 MS. RICHARDSON: Uh-huh.

18 WITNESS ROBINSON: I'm backing up the time?
19 I'm not backing up the time.

20 Q (By Ms. Richardson) Okay. Prior to this,
21 did you ever back up a time? Did anyone ever tell you
22 to back up times on trouble reports?

23 A No, just only on that central office failure.

24 Q That's the only time?

25 A Yeah.

1 Q Okay. Has any manager ever instructed you,
2 as a maintenance administrator, to call the manager
3 before closing out out-of-service reports?

4 A Well, that was when we had the Keys at one
5 time, but that was years ago.

6 Q All right. Can you tell me about that?

7 A Well, if we got ready -- well, basically
8 anything that was in the Keys, if we got ready to close
9 it out, we would show it to our manager and they would
10 say yes or no you know.

11 Q All right. Do you know on what basis they
12 said yes or no? (Pause)

13 A I just -- no, not really. They just wanted
14 to make sure how many of them they was catching -- I
15 mean meeting the commitment, I would assume.

16 Q Okay. And if it was going out of service
17 over 24 hours, would the answer be yes or no on
18 closeout?

19 A Well, I've never had one.

20 Q Okay. Are you familiar with the carried-over
21 no, the CON, the CON code?

22 A Yeah.

23 Q And what's your understanding of that?

24 A It is the customer requests a certain date.

25 Q Okay. Is it a date that's different from the

1 commitment that the Company gave them?

2 A It's different from what the commitment would
3 have been.

4 Q So it's sometime in the future?

5 A Yeah, they request a specific date
6 themselves.

7 Q Okay. Do you know of anyone who has used the
8 CON code to stop the clock?

9 A No.

10 Q Has anyone ever instructed you to use the CON
11 code without talking to a customer?

12 A No.

13 Q Do you know of anyone who has used the CON
14 code without talking to a customer?

15 A No.

16 Q Do you know of anybody who has used someone
17 else's employee code?

18 A I don't know -- no.

19 Q Have you ever used anybody else's employee
20 code?

21 A No.

22 Q Has anyone ever told you to use someone
23 else's employee code?

24 A No.

25 Q Do you know of anyone who has falsified a

1 customer trouble record?

2 A No.

3 Q Have you ever falsified a customer trouble
4 record yourself?

5 A No.

6 Q Has anyone ever instructed you to falsify a
7 customer trouble record?

8 A No.

9 MS. RICHARDSON: Ms. Robinson, I may be
10 through. And I think I am. I want to thank you for
11 your time. The Commission Staff may have some
12 questions for you and Mr. Anthony or your attorney.
13 But thank you.

14 MS. WILSON: I have no questions.

15 MR. ANTHONY: Ms. Robinson, I may have some
16 questions. One minute, please. (Pause)

17 EXAMINATION

18 BY MR. ANTHONY:

19 Q Ms. Richardson asked you some questions about
20 the effect of coding when you are told no more
21 out-of-service today, and whether that would affect
22 rebates or the requirement that the Company clear 95%
23 or more of troubles within 24 hours. Do you remember
24 those questions?

25 A Uh-huh.

1 Q Would your answer depend on whether or not
2 the Company would have cleared that trouble within 24
3 hours as to whether it would affect either the rebate or the -

4 A Wait a minute. Say that again now?

5 Q Isn't it true, Ms. Robinson, that whether or
6 not the index would be affected -- or a rebate, let's
7 talk about rebates. A customer might or might not be
8 entitled to a rebate, it would depend on whether or not
9 the trouble was cleared within 24 hours if it were out
10 of service?

11 A Yes.

12 MR. ANTHONY: That's all I have, thank you.

13 MS. MOSCOWITZ: I have one.

14 EXAMINATION

15 BY MS. MOSCOWITZ:

16 Q Before 1990 or 1991, did you understand that
17 customers got rebates if it took more than 24 hours to
18 clear their troubles?

19 A At that time I wasn't quite sure how long it
20 took. I really wasn't.

21 MS. MOSCOWITZ: I have nothing else.

22 MR. ANTHONY: Thank you, Ms. Robinson,
23 appreciate your time.

24 (The deposition was concluded at 1:50 p.m.)

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AFFIDAVIT OF DEPONENT

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This is to certify that I, SUSIE ROBINSON,
have read the foregoing transcription of my testimony,
Pages 6 through 42, given on April 20th, 1993, in
Docket No. 910163-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.

SUSIE ROBINSON

Sworn to and subscribed before me this
_____ day of _____
1993.

NOTARY PUBLIC
State of _____

My Commission Expires:

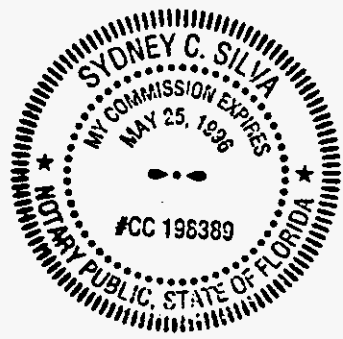
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F L O R I D A)
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C O U N T Y O F L E O N)

CERTIFICATE OF OATH

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

WITNESS my hand and official seal this
12th day of May, 1993.



Sydney C. Silva
SYDNEY C. SILVA
Notary Public - State of Florida

1 STATE OF FLORIDA)
 : CERTIFICATE OF REPORTER
 2 COUNTY OF LEON)

3
 4 I, SYDNEY C. SILVA, Official Commission
 Reporter and Registered Professional Reporter,
 5 DO HEREBY CERTIFY that I was authorized to
 and did stenographically report the foregoing
 deposition of SUSIE ROBINSON;

6 I FURTHER CERTIFY that this transcript,
 consisting of 41 pages, constitutes a true record of
 7 the testimony given by the witness.

8 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'
 9 attorney or counsel connected with the action, nor am I
 financially interested in the action.

10 DATED this 12th day of May, 1993.

11
 12 Sydney C. Silva
 SYDNEY C. SILVA, CSR, RPR
 Official Commission Reporter
 Telephone No. (904) 488-5981

13
 14
 15
 16 STATE OF FLORIDA)
 :
 17 COUNTY OF LEON)

18 The foregoing certificate was acknowledged
 before me this 12th day of May,
 19 1993, by SYDNEY C. SILVA, who is personally known to
 me.

20
 21 Patricia A. Church
 PATRICIA A. CHURCH
 Notary Public - State of Florida

22
 23 My Commission Expires April 20, 1993
 Bonded thru Troy Feltz - Insurance Inc.

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 FLORIDA PUBLIC SERVICE COMMISSION

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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

:
In the Matter of :
:
Investigation into the :
integrity of SOUTHERN BELL :
TELEPHONE AND TELEGRAPH :
COMPANY'S repair service :
activities and reports. :

DOCKET NO. 910163-TL

DEPOSITION OF: SUSIE ROBINSON

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

PLACE: 666 N.W. 79th Avenue
Room 642
Miami, Florida

TIME: Commenced at 1:12 p.m.
Concluded at 1:50 p.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: SYDNEY C. SILVA, CSR, RPR
Official Commission Reporter

AFFIDAVIT OF DEPONENT

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any, as shown on the errata sheet attached hereto.

Susie Robinson

SUSIE ROBINSON

Sworn to and subscribed before me this

1 day of July
1993.

Loren Astourne

NOTARY PUBLIC

State of Florida

My Commission Expires:

