

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

020260-TL

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: MARJORIE S. GRAY

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

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

TIME: Commenced at 3:05 p.m.
Concluded at 4:00 p.m.

DATE: Tuesday, April 20, 1993

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

(X-ref 6008-93)

DOCUMENT NUMBER-DATE
06009 JUN-93

1 APPEARANCES:

2 HARRIS R. ANTHONY, c/o Marshall M. Criser,
3 III, 150 South Monroe Street, Suite 400, Tallahassee,
4 Florida 32301, Telephone No. (904) 222-1201, on behalf
5 of Southern Bell Telephone and Telegraph Company.

6 JANE W. MOSCOWITZ, Baker & Moscovitz, 3130
7 Southeast Financial Center, 200 South Biscayne
8 Boulevard, Miami, FL 33131-5306, Telephone No. (305)
9 379-6700, appearing on behalf of the deponent, Marjorie
10 S. Gray.

11 J. SUE RICHARDSON, Office of the Public
12 Counsel, Claude Pepper Building, Room 812, 111 West
13 Madison Street, Tallahassee, Florida 32399-1400,
14 Telephone No. (904) 488-9330, appearing on behalf of
15 the Citizens of the State of Florida.

16 JEAN R. WILSON, FPSC Division of Legal
17 Services, 101 East Gaines Street, Tallahassee, Florida
18 32399-0863, Telephone (904) 487-2740, on behalf of the
19 Commission Staff.

20 ALSO PRESENT:

21 CARL VINSON, FPSC Division of Communications

22 STAN GREER, FPSC Division of Communications

23 TERRILL BOOKER, FPSC Division of

24 Communications

25 WALTER BAER, Office of Public Counsel

I N D E X

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

Page No.

| | |
|-------------------------|----|
| ERRATA SHEET | 4 |
| STIPULATION | 5 |
| AFFIDIVAT OF DEPONENT | 42 |
| CERTIFICATE OF OATH | 43 |
| CERTIFICATE OF REPORTER | 44 |

WITNESS

| | |
|---------------------------------------|----|
| MARJORIE S. GRAY | |
| Examination by Ms. Richardson | 6 |
| Examination by Mr. Anthony | 39 |
| Further examination by Ms. Richardson | 41 |

ERRATA SHEET

DOCKET NO. 910163-TL
NAME: MARJORIE S. GRAY
DATE: April 20, 1993

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

| Page | Line | |
|------|------|--|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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.

MARJORIE S. GRAY

1
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 Okay. And if you would, if you would state
7 your name and then spell it so that the court reporter
8 will have it correct.

9 A Marjorie S. Gray. M-A-R-J-O-R-I-E S.
10 G-R-A-Y.

11 Q Okay, Ms. Gray, and your address, please.

12 A Home address?

13 Q Uh-huh.

14 A

15
16 Q And your phone number?

17 A

18 Q And have you talked to anybody besides the
19 attorneys on either side of you regarding your
20 deposition today?

21 A Yesterday.

22 Q And who did you talk to?

23 A Jean Baker.

24 Q Oh, another attorney?

25 A Yes.

1 Q Okay. Did you talk to anyone besides an
2 attorney about this deposition today?

3 A Well, everybody at the office knows I'm here.
4 As far as what we're saying, no, they don't know,
5 because I don't know either.

6 Q Okay, that's fine.

7 Has anyone given you any assurance that you
8 would not be disciplined based upon what you said here
9 today?

10 A Yes.

11 Q And has anyone gone over with you the
12 possibility of criminal penalties if you do not tell
13 the truth here today?

14 A Yes.

15 Q Okay. And what is your present position with
16 the Company?

17 A I am a maintenance administrator with
18 Southern Bell.

19 Q All right. And at which IMC are you located?

20 A South Dade.

21 Q And how long have you been there?

22 A Probably ten years.

23 Q Ten years?

24 A I really don't know when we came.

25 Q All right. Well, when did you start with the

1 Company?

2 A 1972, January.

3 Q All right. So you moved to South Dade
4 approximately in the early '80s, sometime then?

5 A Let's see, I went to Homestead for a while.
6 In the early '80s, yeah.

7 Q Okay. And who is your supervisor at this time?

8 A My supervisor, do you mean --

9 Q First level.

10 A First -- okay. Dottie Ketchum.

11 Q And who is your second level supervisor?

12 A April Ivy.

13 Q And how long has Ms. Ketchum been your
14 supervisor?

15 A Probably a year, a year-and-a-half, two
16 years. I don't remember just how long.

17 Q All right. And who was your first level
18 supervisor before Ms. Ketchum?

19 A I'm not sure, I believe it was Maria Smoak,
20 but I'm not positive on that.

21 Q Maria Smoak?

22 A S-M-O-A-K.

23 Q All right. And that would have been before
24 '91, then, approximately?

25 A Yeah. About, if I remember correctly, Maria

1 was only my supervisor for a short time, I believe.

2 Q Okay. And who was your supervisor then
3 before Ms. Smoak? (Pause)

4 A Tony? Tony Ferrer, I believe.

5 Q And that's T-O-N-Y or T-O-N-I?

6 A T-O-N-Y.

7 Q The last name would be spelled?

8 A I believe it was F-E-R-R-E-R.

9 Q Okay. And was there anyone else that you can
10 recall in that ten-year period who might have been a
11 first level supervisor?

12 A That was my supervisor?

13 Q Uh-huh.

14 A Oh, I had a blue million. I don't know. Ed
15 Lubert was at one time, but he was only, I believe he
16 was only there for a short while; and before that was
17 Bill Morrison.

18 Q Morrison I can spell. Is that Lubert?

19 A L-U-B-E-R-T. I don't think he was there that
20 long, though.

21 Q All right. Now what about second levels?
22 You've got April Ivy, and who was before her?

23 A Cherie Calvert.

24 Q And Cherie would have been your supervisor
25 between when and when, approximately?

1 A I have no idea, I really don't. I couldn't
2 even estimate.

3 Q Early '80s, late '80s?

4 A No, it was the late, late '80s, maybe even
5 through '90, I can't remember.

6 Q Okay. And who before Ms. Calvert would have
7 been your second level?

8 A Larry Rorrer.

9 Q And did you have any other second levels that
10 you can tell me about, any others that you can recall?

11 A Shirley Perring.

12 THE REPORTER: I'm sorry, Shirley?

13 WITNESS GRAY: Perring.

14 THE REPORTER: Perring.

15 WITNESS GRAY: P-E-R-R-I-N-G, I believe.

16 Q (By Ms. Richardson) And those four then?

17 A Yes. I believe Shirley Perring was our
18 first, I believe she came with us when we came to South
19 Dade. I came to South Dade from Homestead.

20 Q Okay. And who is your present operations
21 manager?

22 A Ted Rubin.

23 Q And has he been your manager for what, a
24 couple of years?

25 A Two or three years, four years, I don't know.

1 Q And do you remember who it was before Mr.
2 Rubin?

3 A George -- well, I'll be darned.

4 Q Mr. Lewis? George Lewis?

5 A George Lewis, thank you.

6 Q Okay. And do you recall the person before
7 Mr. Lewis?

8 A Izzy Guerrera (phonetic).

9 Q And do you know who your general manager is?

10 A Linda Isenhour. I had to think.

11 Q Okay. What are your duties as an MA? What
12 do you do?

13 A At this time, I am in DTAG.

14 Q And that's D-T-A-G?

15 A Right.

16 Q And is that the dial tone assistance group?

17 A Right.

18 Q All right. Now how long have you been in
19 DTAG?

20 A Probably a year-and-a-half, two years,
21 somewhere along there.

22 Q All right. What did you do, I guess it would
23 be, in 1991 or so back in that period of time then
24 before DTAG?

25 A I worked with cable for a long period of time.

1 Q All right. And when you say you "worked with
2 cable," what were your duties with cable repair?

3 A To dispatch, close cable troubles and work
4 with the cable men in the field.

5 Q All right. And about how long did you work
6 with cable?

7 A Several years, I don't know how many.

8 Q Have you had any other duties as an MA during
9 this ten-year period besides cable and DTAG?

10 A I'm sure I -- well, I've done a lot, yeah,
11 but cable, I was with cable a long time before I came
12 to DTAG.

13 Q Okay.

14 A Before that, I probably screened, closed out
15 troubles, whatever there was to do.

16 Q Okay. You screened and closed out just
17 regular troubles other than cable?

18 A Uh-huh, since I've been the maintenance area.

19 Q Okay. I want to talk about your cable
20 experience for a few minutes, if I can. Are you familiar
21 with the mapper tracker program in cable?

22 A Mapper tracker?

23 Q The computer program that automatically
24 assigns individual cable failures to one big cable
25 failure on a lead ticket.

1 A Well, if you have more than -- yes, to a
2 degree I am. You know, if you have more than a certain
3 amount of troubles come in in one cable, it will build
4 the cable failure. You have to look -- it was my
5 responsibility or our responsibility to look, because
6 they could be individual troubles, they could not have
7 anything to do with each other, or it could be a
8 legitimate cable failure.

9 Q All right. When -- well, let me start off by
10 asking you this question. A customer calls in to CRSAB
11 and says, "I don't have -- "or" I have a trouble on my
12 line." Then does that report come to you as a cable
13 repair person?

14 A No, that goes to a screener.

15 Q That goes to a screener?

16 A Uh-huh.

17 Q Okay. When a customer calls in to the CRSAB
18 and the CRSAB sees a handling code that says, "Cable
19 failed," would that report come --

20 A There would already be a cable failure on
21 that line to indicate a cable failure and it would
22 automatically go in that failure.

23 Q Okay. That report would automatically be
24 attached to whatever the lead cable trouble was?

25 A Right.

1 Q Would you get that report from the CRSAB?

2 A We get -- if I was dispatching a man on the
3 cable failure, I could tell him immediately how many he
4 had in that failure, yes, what the telephone numbers
5 were and what the cable trips were.

6 Q I think it would be easier, instead of me
7 asking direct questions, if you would just kind of
8 describe to me your work in that area somewhat in
9 detail. Not quite like you were training me to do it,
10 but walk me through it so that I can understand what
11 you're doing. Because I'm obviously not clear on what
12 your position was with cable failure.

13 A And you're asking me regarding a cable failure?

14 A Uh-huh.

15 Q All right. If these six people lived in the
16 same area and you worked out of the same cross box, the
17 same main facilities, you each called in with no dial
18 tone, that's going to build a cable failure like that.
19 I'm going to look at it and say, "Hum, something is going
20 on, I'd better get someone out there to check because it
21 is a multiple trouble." It can grow very large very fast
22 and you want to get someone on it very fast.

23 But if these six people called in, you had a
24 drop in your yard, he had a jack in his house that
25 wasn't working, say she couldn't break her dial tone,

1 you could have six different troubles; I should be able
2 to tell that. Then I've got to get people out there,
3 but not a cable man.

4 Q Okay. So that sounds to me like a screening
5 position, when you just get all the residence calls and
6 you determine if they're cable failures or just other
7 types of problems.

8 MS. MOSCOWITZ: Objection. I don't know what
9 kind of question that is.

10 MS. RICHARDSON: That's a follow-up question.

11 Q (By Ms. Richardson) Is that what you're
12 describing?

13 A Well, if it builds -- if you all report -- do
14 I answer that. I'm sorry.

15 Q Yes, you can answer it. She's made an
16 objection formally for the record so that she has her
17 legal objection on the record, but you may still the
18 question.

19 MS. MOSCOWITZ: Well, you rephrased the
20 question into a question; it wasn't a question before
21 that, it was an observation by you. Now you have a
22 question pending and the witness may answer.

23 A Could I have the question again?

24 Q (By Ms. Richardson) Oh. It sounds to me
25 like what you were describing is just sort of a general

1 screening position rather than a cable position and I'm
2 trying to get clear on what the difference is in what
3 you did in your position.

4 A Okay, if you called in, you know, like I say,
5 if the six called in, or five, whatever, it would build
6 a cable failure. It would attach, they would attach
7 together.

8 Q Before it got to you?

9 A And that's going to bring my attention to it
10 very fast. If I was -- now I'm no longer on the cable
11 and I don't know how they're running it now, but at
12 that time or, you know, when I was working with the
13 cable -- and I'm sure it still does.

14 MS. MOSCOWITZ: Do you mean it attaches, the
15 computer attaches this system and, therefore, it gets
16 routed on the computer to you rather than to one of the
17 screeners; is that what you're saying?

18 WITNESS GRAY: Yes. I don't believe it would
19 be routed to the screeners because it would come as a
20 failure and someone that is working the cable would
21 need to look at it and they do look at it very, that
22 gets very fast attention.

23 Q (By Ms. Richardson) Thank you, Ms. Gray.
24 All right. Now, on the closing out of cable reports,
25 did you also handle closing of cable reports?

1 A Yes.

2 Q And what happens when you close the lead
3 ticket, the lead telephone number to all the others
4 that are attached to it?

5 A If you close the lead number out and all the
6 others are attached to it, you close the failure out.

7 Q Okay. So it's a bulk closing process, you
8 close one, you close them all?

9 A Uh-huh.

10 Q All right. So if I entered a 5:00 close time
11 on the lead report, would all the attached reports show
12 a 5:00 closed time?

13 MS. MOSCOWITZ: Now again, the witness, Ms.
14 Gray, has told you she hasn't done this in a few years.
15 So you're asking her present tense questions she has no
16 ability to answer how it's done now.

17 Q (By Ms. Richardson) When you were closing
18 these out if you put a 5:00 closed time on the lead
19 report would that make all the attached reports close
20 out at 5:00?

21 A If I closed -- if they were attached and I
22 closed it, yes.

23 Q All right. If the lead report was an
24 affecting-service report and all the attached reports
25 were out-of-service reports and you closed out the lead

1 report as an affecting-service, would that affect the
2 status on the attached reports?

3 MS. MOSCOWITZ: Objection, that's a
4 hypothetical and I'm not even sure it's a possible
5 hypothetical. And I don't know if the witness can
6 answer it. It's multiply compound.

7 Q All right. Let me rephrase this, Ms. Gray.
8 Does closing out the lead report to affecting-service
9 have any impact on the status of the attached reports?

10 A If you close out the lead report and all of
11 the others are attached to it, they're going to be
12 closed the same way, I believe, with the way you're
13 asking, it.

14 Q Okay. If I take the lead report -- if at any
15 time did you have occasion to close a lead report and
16 change the status to out-of-service on closeout.

17 (Pause)

18 A I really don't understand.

19 Q All right. Let me rephrase it. Let's say
20 you have a lead report that's statused affecting-
21 service and you're getting ready to close it out, do
22 you ever change that status to out-of-service if the
23 outside repairman said it was out-of-service? (Pause)

24 Are you still not clear? If you don't
25 understand --

1 A I really can't, I really can't. (Pause) I'm
2 sure we did if it was out of service, we could do
3 thatat the time I closed out.

4 Q Okay. So it was possible to take a report on
5 closeout and make it out-of-service?

6 MS. MOSCOWITZ: Objection, I don't know what
7 you mean by that. I mean, first of all, you're just
8 restating; it's asked and answered. She said what she
9 said. But I don't know whether you mean properly or
10 improperly, whether the computer permitted that, on
11 what occasions it was done.

12 MS. RICHARDSON: I made no judgements about
13 proper or improper, I'm just asking if it was possible
14 to be done.

15 MS. MOSCOWITZ: You mean whether the computer
16 program committed it?

17 MS. RICHARDSON: So I wanted to make sure we
18 were clear.

19 MR. ANTHONY: Well, actually, I think the
20 question was was it done, not was it possible to be
21 done. Why don't you restate your question so we all
22 know what the question is.

23 MS. RICHARDSON: Let's clear it all off the
24 board and let's start over with that question. Okay.
25 Can we just do that?

1 WITNESS GRAY: Uh-huh.

2 Q (By Ms. Richardson) You have built a cable
3 failure in front of you and you're getting ready to
4 close it out. And you have the lead ticket and you
5 have several attached tickets. Your lead ticket is an
6 affecting-service report or not out-of-service, it
7 hasn't been statused out-of-service at this time and
8 you're trying to close it out. The cable repairman is
9 calling you and telling you that he has found that lead
10 ticket out-of-service.

11 At that point, would it be your understanding
12 in procedures that you would status that lead report
13 out-of-service before you closed it?

14 A Yes.

15 Q Okay. Now, you've statused the lead report
16 out-of-service. Would that affect the status on any of
17 the attached reports?

18 A The attached reports, if you leave them
19 attached, close out the same way you close the lead.

20 Q Okay. So closing -- and I know this is a
21 repeat but I want to just get it real clear. Closing
22 that lead ticket out-of-service changes any status on
23 the attached reports to out-of-service.

24 MR. ANTHONY: There's no foundation, you haven't
25 specified what the status of the other reports is.

1 MS. RICHARDSON: If the attached reports were
2 affecting-service -- all right, let's back up because I
3 don't want to get confused.

4 MS. MOSCOWITZ: I want to go off the record
5 for a second. (Discuss off the record.)

6 Q (By Ms. Richardson) Are you -- do you have
7 any knowledge of anyone bulk statusing cable repairs to
8 out of service on close out to build the base?

9 MS. MOSCOWITZ: Objection, compound,
10 foundation, predicate, there's no basis for what you've
11 asked her. They're filled with terminology which we
12 have no ability to know whether the witness knows.

13 Q That means you can still answer the question.

14 MS. MOSCOWITZ: If you can.

15 Q If you can.

16 A I don't think I can.

17 Q Do you know what "building the base" is, have
18 you heard those terms?

19 A You'd have to tell me, I'm afraid.

20 Q Okay. Are you familiar with a requirement
21 that out-of-service reports be cleared within 24 hours?

22 A That is our -- we are supposed to try our
23 best to give service within 24 hours, yes.

24 Q Okay. And how long has that been the case?

25 A As long as I can remember. I mean, that's

1 just something we do.

2 Q Do you know if there is a Commission rule
3 requiring the Company to clear reports within 24 hours?

4 MS. MOSCOWITZ: Objection. That's not the
5 rule, as I understand it.

6 Q (By Ms. Richardson) At least 95% of the time?

7 A I don't work for the Public Service
8 Commission, I work for Southern Bell, and that's -- we
9 give service. We do our best to give good service.

10 Q Okay. Have you ever heard of the terms
11 "backing up the time"?

12 A Backing up the time? You mean to meet a
13 commitment or what do you mean?

14 Q Uh-huh.

15 A There are times when you can back up the
16 time, sure.

17 Q Okay. And when are those occasions when you
18 can back up the time?

19 A If a man is working in the field and he has
20 given -- he could have given the customer service
21 yesterday but he may still be working on that same job
22 for quite some time.

23 Q Okay. And what time would you show then on
24 the closeout of the report under the circumstances
25 you've just mentioned?

1 MR. ANTHONY: Which time are you referring
2 to, the cleared time or the closed time?

3 Q All right. Which clear time would you show
4 on the report under the circumstances that you've just
5 mentioned?

6 A The clear time I would show when I gave that
7 customer or when that customer received dial tone.

8 Q All right. And what would the close time be?

9 A What time he finished the job.

10 Q All right. What is the longest period of
11 time that you are aware of between a clear time and a
12 closed time?

13 A Oh, I can't answer that. What is the longest
14 time?

15 Q Uh-huh.

16 A I can't answer that. I mean, there's any
17 different amounts of time. When you work with cable
18 men and you put the cable back together, it can be any
19 length of time before they completely finish the job.
20 But the customers can have dial tone. So I really
21 couldn't answer that honestly.

22 Q Okay. Do you know any other circumstances
23 when a clearing time has been backed up?

24 A Any time that the customer receives dial
25 tone, you can be doing the paperwork and give a

1 customer a dial tone and then you are going to show
2 what time you actually gave them dial tone is the way
3 it should be.

4 Q Okay. Do you know of anyone who has backed
5 up a clearing time in order to meet the out-of-service-
6 over-24-hour requirement?

7 A I couldn't give you specifics.

8 Q But have you heard of that being done?

9 A Uh-huh, but I --

10 Q Is that a yes?

11 A Yes. I really can't give you specifics, I
12 don't have any.

13 Q Well, let me see. Have you heard of that
14 being done in South Dade?

15 A To meet a 24-hour commitment, if there's any
16 way you can meet it, you do. You know, you try your
17 best to meet, to give that customer service within a
18 24-hour commitment.

19 Q Okay. Have you ever had -- do you have any
20 knowledge of anyone who did not meet the 24-hour time,
21 but backed up a customer clearing time to show that it
22 was met?

23 A Probably, but I can't tell you, you know, I
24 have no dates, times or actual proof of it.

25 Q But do you know that it was done?

1 MS. MOSCOWITZ: Objection.

2 Q Even though you don't have proof of it, do
3 you know --

4 MR. ANTHONY: How could she know it was done
5 if she doesn't have proof?

6 MS. RICHARDSON: All right. "Proof," by
7 "proof," do you mean documentary, documents, memos or
8 some kind of written record?

9 MR. ANTHONY: Why don't you ask her if she
10 has first-hand knowledge of it? (Pause)

11 WITNESS GRAY: As I said, I'm sure it was
12 done but I have no proof. That's the best I can tell
13 you.

14 Q (By Ms. Richardson) You've just heard that
15 it was done?

16 A I may have done it, but I can't, I can't give
17 you specifics. I really don't know.

18 Q Okay. On occasions when you may have done
19 it, would it have been that a manager or someone told
20 you to do it?

21 A Normally, we ask or I ask -- I won't say
22 "we," I ask, "What time did you give this customer
23 service?" And that's what time I put on the ticket.

24 Q All right. That's normally. Now what about
25 those other times?

1 A That's the way it was normally done. That's
2 all I can tell you, you know.

3 Q Okay. Has any -- have any of your
4 supervisors ever given you instructions not to status
5 troubles as out-of-service?

6 A I'm going back a lot of years, but I believe
7 at one period of time that on the keys we may have not
8 have stasured on the weekends out of service. I have
9 no names -- and that's just -- I couldn't give you a
10 period of time or anything.

11 Q Could you close it into before 1985 --

12 A No, ma'am.

13 Q -- or after 1985?

14 A No, ma'am, I couldn't.

15 Q Was this, in your knowledge, a standard
16 practice, a way of doing the closing out Keys reports?

17 A Now you're talking about closing out.

18 Q I'm sorry. Was this a standard practice at
19 that time?

20 A On closing? What are you --

21 Q I'm sorry, let me back up, because --

22 A -- referring to closing out? Because we were
23 speaking of something else.

24 Q -- I'm confused, Ms. Gray, you're right.

25 A I am, too.

1 Q You're certainly right. I'm confused and I'm
2 confusing you and I'm sorry. I apologize. Let me see
3 if I can back up. We were talking about not statusing
4 out-of-service?

5 A Right.

6 Q Okay. And you referred that it may have been
7 done at some point and you couldn't remember when, in
8 relation to troubles in the Keys?

9 A That's correct.

10 Q Am I back on track?

11 A Uh-huh.

12 Q Okay. Was it standard practice at that time
13 to do it that way?

14 A For -- I really can't remember that much about
15 it because it's been too long. And that's basically all I
16 remember was about the Keys and on the weekends.

17 Q Are you familiar with disposition and cause
18 codes?

19 A Not without looking at them.

20 Q Well, I don't mean specific ones --

21 A Yes, yes.

22 Q -- generally, what is a disposition code?

23 A What the repairperson or whomever closest out
24 the trouble to.

25 Q And what generally is the cause code?

1 A What caused the trouble.

2 Q Okay. Do you know if certain disposition and
3 cause codes would keep a trouble report from being counted
4 as a miss for the Company on the 24-hour requirement?

5 A Yes.

6 Q Okay. Do you know examples of which ones?
7 Not the numbers, but generally.

8 A The cable, if you closed a cable trouble out,
9 you could show a cause code to a cable failure code.

10 Q Is that multiple cable failure?

11 A Yes. And it would move it from, I believe,
12 the index.

13 Q Okay. Were you given instructions at any
14 time to use the multiple cable failure code for all
15 cable failures?

16 A All cable failures will be closed to a cable
17 failure code.

18 Q But the multiple cable, the one that would
19 exclude it from the out-of-service-over-24?

20 A Any cable failure would be closed to a cable
21 failure code.

22 Q Okay. Is there more than one cable failure
23 code?

24 A Not to my knowledge.

25 Q Okay. So you've always only used one

1 disposition code for closing cable failures?

2 A For a -- I guess it's still there, I don't
3 know. But yes, a cable failure is to always closed to
4 a cable failure code.

5 Q Okay. (Pause)

6 Do all cable failures then -- are all cable
7 failures then exempt from being counted against the
8 Company in the out-of-service-over-24-hour index?

9 A I'm sorry?

10 Q If I heard you correctly that all cable
11 failures are closed to the same code and that the
12 multiple cable failure code exempted it from being
13 counted in the cable failure index, then are all cable
14 failures exempt from the out-of-service index?

15 A I don't really understand that.

16 Q Okay, drop that, then. Let me see if I can
17 come at it in a different direction.

18 A I think we're misunderstanding each other.

19 Q Yeah, I know we are; and I'm trying to figure
20 out a way that I can rephrase it so that we don't
21 misunderstand each other and I'm having trouble with
22 that. Let me come back to cable in a minute and move
23 on to something else.

24 Are you aware that if a trouble goes out of
25 service over 24 hours that a customer is due a rebate

1 for that trouble?

2 A Yes.

3 Q And at what time did you become aware of that?

4 A That I can't answer, I -- just common
5 knowledge, if you're out of service over 24 hours, you
6 deserve a rebate.

7 Q Okay. Do you know of any customers who were
8 denied a rebate because of improper coding on customer
9 trouble reports?

10 A If they're not shown out-of-service and they
11 were out of service, they would not be given an
12 automatic rebate.

13 Q Okay, and --

14 A However, if they called the business office
15 and the business office should contact the repair
16 service and say, "Were they out of service?" and we did
17 not have them statused out of service, I'm sure there
18 have been instances where they were given the rebates
19 anyway.

20 Q Okay. Do you know of any occasions when that
21 has occurred?

22 A What?

23 Q When out-of-service -- when customers were
24 denied rebates because trouble reports were not
25 statused out-of-service and they should have been

1 stated out-of-service. (Pause)

2 A I'm sure there are instances, I'm just not, I
3 don't know that I can answer that.

4 Q Okay.

5 A I'm sure there are. (Pause)

6 Q Are you familiar with autoscreener rules?

7 A You mean with automatic screeners?

8 Q Uh-huh.

9 A Yeah. I guess. They've got an automatic
10 screener now.

11 Q Okay. Are you familiar with the wet rules,
12 autoscreener wet rules?

13 A No, I can't say that I am.

14 Q Have you heard of autoscreener dry rules?

15 A No, I can't say that I have. Autoscreener?

16 Q Uh-huh, autoscreener, automatic screening rules.

17 A No. Autoscreener, to me, is just an
18 autoscreener.

19 Q Okay. And what does autoscreener do?

20 A What is my understanding of autoscreener?

21 Q Uh-huh.

22 A It automatically screens the trouble.

23 Q And does it test it?

24 A Yes.

25 Q All right. And does it automatically status

1 it out-of-service?

2 A Yes, as far as I know, it does.

3 Q All right. Do you know how autoscreener
4 would decide if it was out-of-service or not?

5 A No, I don't. I'm sure by the report and by
6 the test.

7 Q Okay. In working cable, did autoscreener
8 at all --

9 A I don't know that we had autoscreener then.

10 Q Okay.

11 A I can't remember when autoscreener came in
12 effect.

13 Q Okay. Do you know of anyone who has closed
14 an out-of-service report and then reopened it in order
15 to complete the repair and close it out?

16 A I don't think I've ever done that. I can't
17 say -- I can't think of anything. I won't say that I
18 haven't, but offhand, I really -- that doesn't ring a
19 bell with me doing it.

20 Q All right. Are cable failures easy to fix?

21 A I'm not a cable man. I'm a cable dispatcher.
22 Or was.

23 Q Or was. Okay. You also closed, right, cable?

24 A Yes.

25 Q In your estimation and your experience, based

1 on your experience, would it take longer to close a
2 cable failure than a regular trouble?

3 A Yeah. A cable failure is usually more
4 involved, sure.

5 Q Okay. In your experience, would it generally
6 take longer to do, after they've restored service on a
7 cable trouble, would it take longer to clean up and
8 finish up, tidy up, whatever it is you did afterwards,
9 that it would on a routine test?

10 A Depending on what they had to do.

11 Q Okay. About how much time then would it take
12 between the time of actual service restoral and the
13 finishing up of everything else they had to do?

14 MS. MOSCOWITZ: I object.

15 A It could take days.

16 Q It could take days?

17 A Excuse me, I'm sorry.

18 Q Okay. It could take days then.

19 A Uh-huh.

20 Q In your experience, would it normally take
21 more than 24 hours on a cable failure to fix, to
22 actually restore service?

23 A There again, that's so wide that I couldn't
24 -- you can't sit -- I mean, you could have a cable cut,
25 you could have a wet cable, you can have a damaged

1 cable, there's no way of giving an estimation on that.
2 I would have -- there's no way. I just can't.

3 Q Okay. Well, let me -- because I think I'm
4 misusing the word "cable," then. I want to make sure
5 my understanding is the same as yours, or try to.
6 Would a drop wire be a cable that you would have been
7 responsible for working on when you were doing cable?

8 A No, ma'am.

9 Q Would cable failures involve those major
10 cables that run between the Company and the
11 termination, the terminal point on the street?

12 MR. ANTHONY: What's a terminal point on the
13 street?

14 MS. RICHARDSON: I'm sorry, termination box? I
15 don't know what they're called, I'm sorry. Let me start
16 over again, I'm getting really tired and I should be --

17 MS. MOSCOWITZ: How about, "what's a cable?"

18 MS. RICHARDSON: There we go.

19 Q (By Ms. Richardson) What's involved in a
20 cable if you're a cable dispatch person? What kind of
21 cables do you work with?

22 A I worked with no cables, I worked with the men
23 that worked on the cables. But I think you're getting
24 confused between cable failures and cable troubles.

25 Q Did you work with both?

1 A Yes.

2 Q Okay. And what's the difference?

3 A Well, you can have individual troubles and
4 you can have cable failures. A failure is when, as I
5 said, if you've got a multiple cable failure. A
6 trouble is an individual person that has a problem in
7 the cable, and you can have an individual person that
8 does have a problem in the cable.

9 Q When you find the individual person with the
10 trouble in the cable, do you detach that trouble from
11 the lead ticket?

12 MR. ANTHONY: Objection. There is no
13 foundation that there is a lead ticket.

14 MS. MOSCOWITZ: Objection.

15 Q (By Ms. Richardson) When you're dealing with
16 just the cable troubles and not the major cable
17 failure, do those cable troubles get attached to a lead
18 ticket at all?

19 A No.

20 Q They're individually handled?

21 A Yes.

22 Q Okay.

23 A And I'm sorry, I shook my head.

24 Q You're doing great.

25 Okay. Ms. Gray, do you know of anyone who

1 has falsified a trouble report?

2 A In what way?

3 Q In any manner whatsoever. Do you know of
4 anyone who has put false information on a customer
5 trouble report?

6 MS. MOSCOWITZ: I object to the term "false."

7 Q (By Ms. Richardson) Incorrect information on
8 a customer trouble report? (Pause)

9 A When closing out individual cable troubles, I
10 was instructed to close them out to a cable failure.

11 Q (By Ms. Richardson) Okay. At that time, did
12 you understand, was it your understanding that they
13 were not a legitimate cable failure?

14 MS. MOSCOWITZ: I object to the term
15 "legitimate."

16 A I knew they were not a failure.

17 Q Do you know why you were instructed to do this?

18 A I was told that the code had been made
19 available to us and we would use it. So I used it.

20 Q All right. Who instructed you to do this?

21 A First level instructed me. I also questioned
22 a second level -- and I do not remember who it was, it
23 was either one of two people but I don't remember --
24 and they said that it had been made available and we
25 would use it, so I did.

1 Q All right. And I need the names of the two
2 people. Granted that you don't remember which one of
3 them, but who were they?

4 A

5 And I do not remember which one.

6 Q All right. And those are your
7 so those are the ones that you questioned?

8 A Yes.

9 Q And what was your question to them?

10 A Why we would close out an individual's
11 trouble to a cable failure.

12 Q Okay. And did they give you any other reason
13 besides that it was made available?

14 A No.

15 Q How long did this practice continue?

16 MS. MOSCOWITZ: Objection, I don't know that
17 we know it's a practice.

18 A I really can't answer that.

19 Q Was this just one report or did it affect
20 several reports?

21 A No. It affected all the reports.

22 Q Okay.

23 A No, wait a minute. It affected a lot of the
24 reports. I can't say all.

25 Q Okay. And closing them out to the cable

1 failure code, would that take those individual cable
2 troubles out of the out-of-service-over-24 index?

3 A I believe it would take it out of the index.
4 I don't know about it taking it out of the rebate
5 index, I can't answer that.

6 Q Okay, that's fine. In your time in South
7 Dade, did you receive any other instructions which you
8 questioned your supervisor about?

9 A Probably a lot of them, but I can't really -- I
10 question a lot, you know. I'm just an inquisitive person.

11 Q Okay, let me rephrase my question then. Were
12 there any other instructions that you were given that
13 you felt may have been improper which you questioned?

14 A I really can't say at this point. I really
15 can't.

16 Q Okay. Ms. Gray, do you work with service
17 orders at all now?

18 A In DTAG, sure.

19 Q You work with them in DTAG?

20 A Uh-huh.

21 Q Is there a requirement that service be
22 installed within a certain period of time?

23 A I have no idea. I don't handle that. I
24 can't answer that.

25 Q Okay. Do you have any knowledge of

1 procedures on handling service orders that you felt
2 were incorrect?

3 A I try not to. All I do is give them dial tone.

4 MS. RICHARDSON: Okay. Okay, Ms. Gray, I
5 think I'm through for right now and I want to thank
6 you, okay? I appreciate it. The Commission people may
7 have some questions for you before you go.

8 WITNESS GRAY: Okay.

9 MS. WILSON: No questions.

10 MR. ANTHONY: Ms. Gray, if you would just
11 give me one minute? (Pause)

12 EXAMINATION

13 BY MR. ANTHONY:

14 Q Ms. Richardson had asked you a series of
15 questions about the times out-of-service troubles might
16 have been closed as service-affecting?

17 A I'm sorry?

18 Q The times that out-of-service troubles may
19 have been closed as service affecting? Do you remember
20 that line of questioning? She had asked you whether
21 there were times that out-of-service troubles may have
22 actually been closed to a service-affecting code?

23 A Okay.

24 Q Do you recall that line of questions? You
25 have to say "yes" or "no" for the court reporter.

1 A Oh, I'm sorry. Yes.

2 Q And I think your response was something like,
3 "I'm sure there were times that out-of-service may have
4 been closed to service affecting;" that's not an exact
5 quote but it's fairly close to your response. Do you
6 recall that?

7 A Yes.

8 Q Is that a fair paraphrase of what you said?

9 A Yes.

10 Q Is that speculation on your part or do you
11 have any firsthand knowledge of that?

12 A No, it's common -- I mean, we're not perfect.
13 You know, there has to be times and I'm sure there is
14 times that someone with out-of-service -- I mean it was
15 closed to a service-affecting.

16 Q That a mistake was made, is that what you
17 were talking about?

18 A Probably.

19 MR. ANTHONY: Thank you. That's all I have.

20 WITNESS GRAY: Okay.

21 MS. MOSCOWITZ: I have no questions.

22 MS. RICHARDSON: Can I do just do one follow up?
23
24
25

FURTHER EXAMINATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BY MS. RICHARDSON:

Q Were there times that you're aware of when it was done on purpose other than a mistake?

A There could have been, but I can't tell you.

MS. RICHARDSON: I'm through.

MS. ANTHONY: Thank you, Ms. Gray.

MS. RICHARDSON: Thank you, Ms. Gray.

(Thereupon, the deposition concluded at 4:00 p.m.)

AFFIDAVIT OF DEPONENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

This is to certify that I, MARJORIE S. GRAY, have read the foregoing transcription of my testimony, Page 6 through 41, given on April 20, 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.

MARJORIE S. GRAY

Sworn to and subscribed before me this _____ day of _____, 19____

NOTARY PUBLIC

State of _____

My Commission Expires:

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

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

CERTIFICATE OF OATH

I, the undersigned authority, certify that
MARJORIE S. GRAY 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, SIDNEY 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 MARJORIE S. GRAY;

6 I FURTHER CERTIFY that this transcript,
7 consisting of 41 pages, constitutes a true record of
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,
9 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.

10 DATED this 12th day of May, 1993.

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

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

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

21 Patricia A. Church
22 PATRICIA A. CHURCH
Notary Public - State of Florida
23 Notary Public, State of Florida
My Commission Expires April 20, 1995
24 Bonded Thru Trey Fain - Insurance Inc.
25

ERRATA SHEET

DOCKET NO. 910163-TL

NAME: MARJORIE S. GRAY

DATE: April 20, 1993

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

| Page | Line | |
|------|------|--|
| 14 | 5 | Strike "trips" and insert in its place "pairs" so the sentence ends ".... what the cable pairs were." REASON: The reporter transcribed the wrong word. |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

DOCUMENT NO. 06009-93
DATE 1-1-93
FPSC - COMMISSION CLERK

9-12-11
append to end of DN - ac

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

 In the Matter of : DOCKET NO. 910163-TL
 :
 Investigation into the :
 integrity of SOUTHERN BELL :
 TELEPHONE AND TELEGRAPH :
 COMPANY's repair service :
 activities and reports. :

DEPOSITION OF: MARJORIE S. GRAY

TAKEN AT THE INSTANCE OF: Florida Public Service
Commission

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

TIME: Commenced at 3:05 p.m.
Concluded at 4:00 p.m.

DATE: Tuesday, April 20, 1993

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

FLORIDA PUBLIC SERVICE COMMISSION

AFFIDAVIT OF DEPONENT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

This is to certify that I, MARJORIE S. GRAY, have read the foregoing transcription of my testimony, Page 6 through 41, given on April 20, 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.

Marjorie S. Gray
MARJORIE S. GRAY

Sworn to and subscribed before me this

23 day of June, 1993

Karen Osbourne

NOTARY PUBLIC

State of Florida

My Commission Expires:

