

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

) DOCKET NO. 910727-TL

-----)
In re: Investigation into)
SOUTHERN BELL TELEPHONE AND)
TELEGRAPH COMPANY'S complaine)
with Rule 25-4.110(2), F.A.C.,)
Rebates.)
-----)

) FILED: 04/28/93

DEPOSITION OF: WANDA PAYNE
TAKEN AT THE INSTANCE OF: The Staff of the Florida
Public Service Commission
PLACE: 605 West Garden Street
Pensacola, Florida 32501
TIME: Commenced at 3:00 p.m.
Concluded at 3:35 p.m.
DATE: Monday, May 10, 1993
REPORTED BY: Michael J. Wierzbicki, CP, CRMS
Registered Professional Reporter

1 APPEARANCES:

2 JANIS SUE RICHARDSON, Staff Counsel, 111 West Madison
3 Street, Tallahassee, Florida 32399, Telephone No. (904)
4 488-9330, appearing on behalf of the Office of Public
5 Counsel.

6 JEAN R. WILSON, Staff Counsel, Stan L. Greer, Engineer
7 and Terrill Booker, Engineer, 101 East Gaines Street,
8 Fletcher Building, Room 226, Tallahassee, Florida 32399,
9 Telephone No. (904) 487-2740, appearing on behalf of the
10 Florida Public Service Commission.

11 ROBERT G. BEATTY, Esquire, 150 West Flagler, Suite
12 1910, Miami, Florida 33130, Telephone No. (305) 530-5564,
13 appearing on behalf of Southern Bell.

14 ALSO PRESENT:
15

16 EARL POUCHER
17
18
19
20
21
22
23
24
25

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

STIPULATION	4
CERTIFICATE OF OATH	30
CERTIFICATE OF REPORTER	31

W I T N E S S

WANDA PAYNE	
Examination by Ms. Richardson	5

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.

1 WHEREUPON,

2 WANDA PAYNE

3 was called as a witness and, after having been first duly
4 sworn, was deposed and testified as follows:

5 EXAMINATION

6 BY MS. RICHARDSON:

7 Q Ms. Payne, will you please state your name, and
8 then spell it for the court reporter?

9 A Wanda, W-a-n-d-a, Payne, P-a-y-n-e.

10 Q And your address?

11 A 30 West Belmont Street, Pensacola, Florida.

12 Q And the zip code?

13 A I don't know the zip code.

14 Q Is that a business address?

15 A That's my office, yes.

16 Q Your office?

17 A Uh-huh (indicating affirmatively).

18 Q And what's your phone number?

19 A It's 436-1977.

20 Q And what's your present position?

21 A I'm a maintenance administrator.

22 Q And how long have you been a maintenance
23 administrator?

24 A About 17 -- well, the title changed, but I've
25 been in the job about 17 years.

1 Q Has all of that time been in Pensacola?

2 A Yes.

3 Q Have you talked to anybody other than the

4 attorney for the company about your deposition here today?

5 A No.

6 Q Has anyone advised you that you would not be

7 disciplined based upon your answers here today?

8 A Yes.

9 Q Has anybody advised you of the possible criminal

10 penalties that could apply if you perjure your testimony?

11 A Yes.

12 Q Have you made a statement to a company

13 investigator about the repair process?

14 A Yes, we did.

15 Q Do you know when?

16 A Not a definite date. It was about

17 two-and-a-half years ago.

18 Q Do you know who was present when you gave your

19 statement?

20 A There was someone from security, and there was a

21 company attorney. There was three people, I don't remember

22 who the other one was.

23 Q Do you know what position they held?

24 A No, I don't.

25 Q Were they a union representative?

1 A No, they were not.

2 Q How about a supervisor?

3 A There was not a supervisor in the room.

4 Q Do you know if maybe it was just another
5 attorney?

6 A I think it was another attorney.

7 Q Were they with the company?

8 A Yes, I think they were all with the company.

9 Q What I'd like you to do, I'm going to ask you
10 about your supervisors to kind of tell me who they were, and
11 if you would start with your first-level supervisor, who's
12 your present first level?

13 A Jean Bailey.

14 Q Bailey?

15 A B-a-i-l-e-y.

16 Q And how long has Ms. Bailey been your
17 supervisor?

18 A She's been my supervisor about -- less than a
19 year, because they've changed supervisors in the test center
20 with people retiring.

21 Q And who was it before Ms. Bailey?

22 A Probably Grady Barnes before he retired.

23 Q Grady, G-r-a-d-y?

24 A d-y.

25 Q And about how long was it Mr. Barnes?

1 A Several years.

2 Q Have you had any other first levels besides Mrs.
3 Bailey and Mr. Barnes?

4 A I had Tom Winslow at one time before Grady.
5 They used to change us around to different supervisors in the
6 test center.

7 Q Any others besides those three?

8 A I don't think so.

9 Q What about second-level managers, who's your
10 present second level?

11 A Freddie Hunter.

12 Q I'm sorry. You said Grady Barnes?

13 A Freddie Hunter.

14 Q I got that completely wrong. I'm glad I asked
15 you to repeat it.

16 And how long has Mr. Hunter been your second
17 level?

18 A He came back into the test center when Shirley
19 Perring retired, so it's been probably in the last two years
20 that he's been back to the test center.

21 Q Was it Ms. Perring before Mr. Hunter?

22 A It was Ms. Perring before Mr. Hunter.

23 Q Do you know how long Ms. Perring was your
24 supervisor?

25 A She wasn't there very long. She was there

1 probably less than six months.

2 Q And who was it before Ms. Perring then?

3 A Freddie Hunter.

4 Q Again?

5 A Right.

6 Q And was there any other second-level supervisor
7 back to about 1980 that you can recall?

8 A 1980?

9 Q Yes.

10 A I can't remember his name, but there had been
11 someone before that.

12 Q Before Mr. Hunter?

13 A Before Mr. Hunter, right.

14 Q And do you know who your operation manager is
15 right now?

16 A John St. Amant.

17 Q And do you know who it was before Mr. St. Amant?

18 A Mr. Mann.

19 Q And was Mr. Mann your manager back, say, early
20 eighties or was there another operations manager before that?

21 A There was one before that. Mr. Poucher was one
22 of them.

23 Q And is that about all that you can recall?

24 A No, there were others. There was Mr. Strange,
25 Mr. Cook.

1 Q And Mr. Cook?

2 A Uh-huh (indicating affirmatively).

3 Q And are you union; are you in the union?

4 A Yes, I am.

5 Q Do you know who your union steward is?

6 A Yes, I do.

7 Q Who is that?

8 A Sybil Cody.

9 Q Can you briefly tell me what it is you do as a
10 maintenance administrator?

11 A Well, we screen the troubles, and determine
12 whether there's to be dispatch on them or what's to come of
13 them. We test them, and then determine what to do with the
14 troubles. Then we dispatch the men when they call in, and if
15 they're not -- if there's some reason they need to call back
16 to close out, that they can't close out on their CAT's, then
17 we close the trouble for them.

18 Q Do you have some ST's that don't have CAT's?

19 A I think most of them have CAT's now.

20 Q What about-

21 A (Interposing) And still sometimes they're down.

22 Q What about cable, do the cable guys call you?

23 A We do close cable. I think the cable men have
24 CAT's now, but they don't close their own troubles.

25 Q Why don't they; do you know?

1 A No, I don't. I don't think they're programmed
2 for it yet.

3 Q When you say screen, is part of the screening
4 getting some kind of test on the trouble?

5 A Right, it's testing the trouble to determine
6 what's wrong with the line.

7 Q And when you do that, do you decide whether it's
8 service affecting or out of service?

9 A We have certain codes that are automatically out
10 of service, if they're reporting out-of-service conditions,
11 like a no dial tone or can't call out or can't be called.

12 Q And has that always been the case?

13 A No, that hasn't always been the case. Before we
14 determined when we tested the number and attempted to reach
15 the customer whether it was out of service or not. Now we
16 have mandatory codes that are out of service.

17 Q And since when have you had the mandatory codes;
18 can you remember about when they started?

19 A Probably about three or four months ago.

20 Q Do you deal with auto-screener at all?

21 A We don't deal with auto-screener without the --
22 when they give it to auto-screener, they send the trouble to
23 us to look at, but we don't deal with auto-screener.

24 Q In statusing out-of-service reports, was there
25 ever a time as a maintenance administrator when you were

1 directed to wait until closeout before making the report out
2 of service?

3 A No.

4 Q Have you always statused up front then?

5 A Yes.

6 Q Do you know of any manager who has told the
7 MA's, either you or other MA's working near you, don't status
8 any out of services today?

9 A No.

10 Q Do you know of any managers who have said take a
11 certain number of service-affecting reports and change them
12 to out of service?

13 A No.

14 Q Have you heard the phrase backing up the time?

15 A I've heard the phrase.

16 Q And what does that mean to you?

17 A Well, to me it means showing a time other than
18 the actual time that the man calls in. Like a cable trouble,
19 if he calls in at 5:30, and you ask him when did he clear the
20 trouble, if he cleared that trouble at four o'clock and he
21 closed up to the cable, to me that would be backing up the
22 time, to show an actual cleared time.

23 Q And, in your opinion, is that proper to do that
24 or improper?

25 A If that customer was given service at that time,

1 it's not improper.

2 Q Have you ever heard of anyone backing up a
3 clearing time just to get it done within 24 hours?

4 A No.

5 Q Are you familiar with the requirement that the
6 company clear out-of-service reports within 24 hours at least
7 95 percent of the time?

8 A Yes, I know that.

9 Q And how long have you been aware of that
10 requirement?

11 A I've probably known that -- well, it was really
12 brought to our attention in the last year.

13 Q But you think you may have known that before?

14 A I think I may have known that, because I've
15 worked as a clerk at one time that dealt with the reports and
16 all. But as far as backing up time just to keep from missing
17 it for 24 hours, no, I don't think we did that. I think we
18 may have backed up time, you know, just to cover -- say the
19 man cleared the trouble before he actually called in.

20 Q Was there ever any point when a manager
21 instructed you -- just sort of assume that there's a
22 15-minute window, because they work on a 15-minute clock,
23 where you just assumed that that was -- if it went over 15
24 minutes past 24, you could assume that he had really cleared
25 it on 24?

1 A Not -- we were never told that directly, no, not
2 15 minutes. We were told if he called in to question him,
3 and if we were going to miss a commitment within 15 or 20
4 minutes, to back it up.

5 Q When you say miss a commitment, you mean the
6 24-hour commitment?

7 A No.

8 Q Which commitment?

9 A The commitment that we gave the customer that we
10 would have his restored. I don't think 24 hours was ever
11 brought into play. See, if we told him we was going to have
12 his service at five o'clock today, if we missed it by 15
13 minutes, we might back it up to five o'clock, but not for it
14 to be 24 hours, because you can't always, when you're closing
15 a trouble, really look at it and tell when he came in to know
16 whether it's 24 hours or not.

17 Q You mean you as an MA or you as an ST?

18 A Me as an MA, you would have to do another
19 transaction and go back and look to actually see when it was
20 received.

21 Q So when you're looking at a screen then, the
22 final status screen does not show you the receipt time, is
23 what you're saying?

24 A No, it does not show you the receipt time.

25 Q Does it show you whether it's out of service or

1 not?

2 A No, it doesn't show you where it's out of
3 service, not when you're bringing up the mass to close a
4 final trouble out, it doesn't show you where it's out of
5 service. You have to do another transaction and look for it,
6 and if it's over four lines of statuses, you've got to print
7 it to see if it's been statused out, because you can only go
8 back and review four lines of status.

9 Q So you've heard of doing maybe a 15 minute on a
10 commitment time?

2

11 A Right, but not to keep for 24 hours.

12 Q I'm going to show you a document. This is
13 Southern Bell's Response to Preliminary Order Number PSC
14 930263 PCOTL entered on February 19, 1993, and it was filed
15 by the company on April 1, 1993 in the consolidated docket.
16 Ms. Payne, there is a Wanda F. Payne listed at Number 459 out
17 of the 650 names here, and I'd like to know, first, have you
18 seen this document?

19 A Uh-uh (indicating negatively).

20 Q Okay. Then I'd like to go off the record a
21 minute and give you a chance to look at it and read the
22 document, and then when we get back on I'll ask you if that's
23 your name -- well, first of all, is that your name there?

24 A Yes, it's my name.

25 Q Okay. Then we'll go off the record and let you

1 have a chance to look at it.

2 (A discussion was held off the record.)

3 Q (By Ms. Robinson) Ms. Payne, on that document,
4 there are two numbers by your name. If you can find your
5 name, I believe we've got Number 1 and Number 17.

6 A Uh-huh (indicating affirmatively).

7 Q And Number 1 indicates that you have some
8 information about backing up clearing and closing times. Do
9 you have any information other than what you've told me?

10 A Nope.

11 Q Do you have any idea why your name would appear
12 on that?

13 A I sure don't.

14 Q Under your name is also Number 17, and that
15 indicates intimidation or pressure, and I'm wondering what
16 information you have.

17 MR. BEATTY: If any at all.

18 A Really, nothing. I did not feel intimidated or
19 pressured to back up time.

20 Q (By Ms. Richardson) Do you know anyone else who
21 has?

22 A The only person that I ever knew that got a
23 verbal dressing down for missing an appointment by five
24 minutes, and I don't know that it was a 24-hour appointment.
25 He had missed it by five minutes.

1 Q And who was this that got the dressing down?

2 A

3 Q

4 A

5 Q

6 A

7 Q Was he an MA or an ST?

8 A He was an MA.

9 Q And what did ; tell him that you
10 recall?

11 A That he had missed his appointment by five
12 minutes, and why did he do it.

13 Q Was there any formal discipline in terms of the
14 B-Form?

15 A I don't have any idea.

16 Q Do you know anyone else who has been disciplined
17 for missing a time on a report?

18 A Not personally. I know we heard we had an MA
19 that had an entry for missing appointments, but I don't know
20 that to be a fact.

21 Q When you say entry, do you mean a B-Form?

22 A Yes.

23 Q Do you know of any Craft people that have
24 protested a manager's instructions on handling a report
25 because the MA thought it was improper?

1 A We probably all question something at one time
2 or another, but nothing in particular. If we didn't think it
3 was right -- if I don't think it's right, I'm going to ask
4 you why.

5 Q Do you know of any Craft that have protested a
6 manager's instructions because the Craft felt the manager was
7 interested only in meeting the 24-hour requirement and not in
8 putting what was accurate on the report?

9 A No, I don't.

10 Q Do you know if customers are due a rebate if
11 their service is out longer than 24 hours?

12 A Yes, I know they are, and I know it's on -- I
13 know it's an automatic report that goes out for them to be
14 rebated.

15 Q And how long have you known that?

16 A I've known that for several years, because I
17 worked as a clerk and I had to prepare the forms when we
18 didn't -- when it wasn't automated, when we used to have to
19 do it manually.

20 Q And what did you do as a clerk?

21 A We took the morning -- we took the tickets and
22 input them when it was done manually, and then we had to go
23 back and manually count them and make reports from it before
24 I was an MA.

25 Q And approximately when was this?

1 A I'm going to say 14 years ago. I'm not even-

2 Q (Interposing) Back in the seventies?

3 A It was back -- yeah, it was back then before we
4 went mechanized.

5 Q Do you know anybody who's used somebody else's
6 employee code?

7 A No.

8 Q Do you know any employee who has had his or her
9 code used without their knowledge?

10 A No.

11 Q Do you know what a no access is?

12 A Yes.

13 Q What's a no access?

14 A It's when you go to a customer's premises and
15 he's not at home.

16 Q And is the ST supposed to leave some kind of
17 message?

18 A He's supposed to leave a tag or reach a contact
19 number and notify someone.

20 Q And do you know if that no access stops that
21 24-hour clock?

22 A Yes, it does.

23 Q Do you know anyone who has used a no access just
24 to stop that 24-hour clock?

25 A No, I don't.

3 1 Q Do you know anyone who has no accessed reports
2 without dispatch?

3 A No.

4 Q Do you know anyone who has taken a batch of
5 out-of-service reports and just no accessed them?

6 A No.

7 Q What's a test-OK?

8 A A test-OK is one when you're testing you don't
9 test a trouble, and you contact the customer and talk with
10 them and see if they're having trouble.

11 Q Do you know anyone who has taken test-OK reports
12 and just statused them out of service?

13 A No.

14 Q Have you ever heard of building the base?

15 A I've heard the phrase.

16 Q And what was your understanding of that phrase?

17 A I heard it in -- like someone was inputting
18 reports that wasn't actual reports, and using them to build a
19 base and place them.

20 Q And did you hear who was doing this?

21 A I heard it was going on in Gainesville, and
22 that's all I heard.

23 Q Did you hear whether or not it was going on in
24 Pensacola?

25 A No.

1 Q Do you know what the CON code, the C-O-N or
2 carried-over no code is?

3 A The carried-over code we use -- we don't use
4 anymore, we used to use when a customer requested a later
5 dispatch. Say he reported it today, and he wasn't going to
6 be home until, say, next Monday, and he would request a later
7 date. And we use that to put it into a pool where we would
8 go in the day before it was due, and put it back in for them
9 to go.

10 Q Does that CON report stop that 24-hour clock?

11 A I don't think so.

12 Q You don't think so. Do you know if-

13 A (Interposing) If it's statused out of service,
14 I would not think so.

15 Q Do you know of anyone who has used that time
16 code to status out-of-service reports to affect that 24-hour
17 clock?

18 A No, I don't.

19 Q Is there a future date request code?

20 A CON used to be future date, but we know longer
21 have CON.

22 Q So future date wasn't a separate code for CON
23 then?

24 A No, it was -- CON was used for future dates.

25 Q Do you know what the disposition and cause codes

1 are?

2 A Yes.

3 Q What's a disposition code generally?

4 A A disposition tells you what the man did to
5 repair the trouble. The cause code tells you what caused the
6 trouble.

7 Q So a disposition code might show inside wire?

8 A Inside wiring or it might show an outside drop.
9 And then the cause code would tell us where it was defective
10 or weather caused it or what the actual cause was.

11 Q Do you know if there are certain disposition and
12 cause codes that can be used to take an out-of-service report
13 and not count it as a miss against the company on that
14 out-of-service over 24?

15 A I think weather codes exclude them.

16 Q Do you know of anyone who has used those cause
17 codes then to deliberately exclude an out of service from
18 being counted?

19 A No.

20 Q Have you ever had a manager direct you to
21 contact him before you closed a report out, out-of-service
22 report?

23 A An out-of-service report, to contact him, no,
24 before you close it.

25 Q Throughout, say, from the period 1985 forward,

1 have you ever had a manager tell you not to put disposition
2 and cause codes on an out-of-service over 24 without telling
3 him about it?

4 A No.

5 Q Do you know of anyone who has taken an
6 out-of-service report that's been about to go out over 24,
7 close it, and then open an employee report, actually fix the
8 trouble, and close it?

9 A That, I would say, the only time I know about
10 that happening is when a cable man has restored service and
11 they still have routine work to do. If he tells you service
12 is restored, we do ask him to close that trouble.

13 Q What's an exclude report; when you exclude, what
14 do you do?

15 A An exclude report is like someone reporting
16 someone else's number, like a receiver off the hook or
17 something like that, or something we refer to the business --
18 that's handled by another department. We have specific
19 things that can be excluded.

20 Q Has that always been the case?

21 A Yes.

22 Q And has the Bell South practice on that been
23 pretty much the same the whole time you have been in-

24 A (Interposing) As far as I can remember, it has.

25 Q Do you know of anyone who has excluded

1 out-of-service reports?

2 A Not to my knowledge.

3 Q Is it proper to exclude an out of service?

4 A No, no.

5 Q Have you heard of that being done at all?

6 A No. Excludes are pretty specific, you've got to
7 have the exact narrative.

4

8 Q Do you know of anyone who has taken a group of
9 service-affecting reports and statused them as out of service
10 just to meet that 24 hours?

11 A No, sure haven't.

12 Q Do you know of anyone who has created, other
13 than what you've already talked about, fictitious repair
14 reports?

15 A No.

16 Q Do you know of anyone who has put false codes on
17 reports?

18 A No.

19 Q You mentioned a Mr. Haber. Do you know where
20 Mr. Haber is now?

21 A I guess he still lives out in Cantonment. He's
22 retired. He's been retired almost two years.

23 Q You also mentioned that there was an MA who got
24 a B-Form?

25 A Right.

1 Q Do you know who that was?

2 A I know who they said it was, but, like I said, I
3 do not know it to be fact that she did.

4 Q Well, who was it that supposedly got one?

5 A She's retired now, I

6 Q

7 A

8 Q Do you know if she protested that B-Form or that
9 grievance?

10 A I don't know.

11 Q And do you know who her supervisor was that
12 would have given her the B-Form?

13 A I think she was working for John Wells at that
14 time.

15 Q Can you remember anything else about the reason
16 she got the B-Form, what she did or didn't do?

17 A Other than something about missing commitments.

18 Q And that was it?

19 A That was it.

20 Q Do you know where is right now?

21 A She lives in Panama City.

22 Q Have you ever been asked to help with sales by
23 the company?

24 A At one time we had a sales program in the
25 maintenance center. When we closed a trouble out or talked

1 with a customer, we offered them -- if they didn't already
2 have calling features and things, we would offer it to them.

3 Q Did you also sell wire maintenance plans?

4 A Yes, we did.

5 Q And were you given any kind of special training
6 for the sales that you did?

7 A No, we were not.

8 Q Were you asked to participate or told to
9 participate?

10 A We were told to participate. We were told to
11 ask the customers as we closed out and when we had contact
12 with them.

13 Q Did you keep track of that at all any kind of
14 way; did you have any record?

15 A We had a form or something we had to fill out at
16 that time, but I don't have it now, no.

17 Q What did the form look like; what was on it?

18 A It was a form we had to fill out with our sales
19 number, and then we had to call the business office if they
20 -- you know, if they wanted to add wire maintenance and call
21 the business office to issue the order.

22 Q And did the form have all the different services
23 listed and the different products and features?

24 A No, uh-uh. We wrote on it what we actually
25 sold, and it had our -- we had a sales number we had to put

1 on it.

2 Q Did it also have a place for keeping track of
3 the amount of time you spent talking to that customer about
4 sales?

5 A No, it did not.

6 Q Did you keep track of the time you spent doing
7 sales?

8 A No.

9 Q Do you know anybody who has recorded the sales
10 of a feature or a service to a customer without actually
11 contacting that customer?

12 A No.

13 Q Do you know anyone who recorded a sale to a
14 customer without that customer's approval?

15 A No, I don't.

16 Q Are you still doing sales for the company now?

17 A No.

18 Q When did that stop?

19 A It stopped probably two years ago, three years
20 ago. We haven't done it in a long time. We used to could,
21 if they wanted something, you know, call the business office,
22 but we stopped actively trying to sell.

23 Q Were you encouraged to try to sell all of your
24 customers every feature and all the wire maintenance plans?

25 A No, uh-uh. We just offered it to them, and if

1 they was interested, then we would talk to them.

2 Q And how did you do with sales when you were
3 doing it?

4 A Not very good, not very good.

5 Q Did you get any points or awards or anything?

6 A I got enough to get a blanket, that was all.
7 Not very good.

8 Q And if I've asked you this question, you just
9 tell me. Have you filed any grievances with the company
10 regarding instructions you may have received about handling
11 trouble repair reports?

12 A No, I haven't.

13 Q When you were told that you would be helping
14 with sales, did you agree with that or-

15 A It's wasn't something you agreed with. We were
16 told we would do it.

17 Q Did you protest at all?

18 A No. We grumbled lot, but we still had it to do.

19 MS. RICHARDSON: Ms. Payne, I want to thank you
20 for your time.

21 Excuse me for a minute.

22 Can we go off the record a second?

23 (A discussion was held off the record.)

24 MS. RICHARDSON: Anyway, I think I'm through,
25 unless somebody jogs my memory on something. Okay?

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

THE WITNESS: Okay.

MS. RICHARDSON: And I want to thank you for being here, and for taking your time to come and talk to us.

THE WITNESS: Okay.

MS. WILSON: I have no questions.

MR. BEATTY: Okay. That's it.

MS. RICHARDSON: Thanks, Ms. Payne.

WHEREUPON, the deposition was concluded.

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

CERTIFICATE OF OATH

STATE OF FLORIDA)
) SS.
COUNTY OF ESCAMBIA)

I, Michael J. Wierzbicki, certify that WANDA
PAYNE personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 28th day
of May, 1993.

Michael J. Wierzbicki



WIERZBIcki MOMENTUM SERVICES CORPORATION CORPORATION

1 REPORTERS DEPOSITION CERTIFICATE WITH ACKNOWLEDGMENT

2 STATE OF FLORIDA)
3)
4 COUNTY OF ESCAMBIA)

5 I, Michael J. Wierzbicki, CP, CMRS, Registered
6 Professional Reporter, certify that I was authorized to and
7 did stenographically report the foregoing deposition; and
8 that the transcript is a true record of the testimony given
9 by the witness.

10 I further certify that I am not a relative,
11 employee, attorney or counsel of any of the parties, nor am I
12 a relative or employee of any of the parties' attorney or
13 counsel connected with the action, nor am I financially
14 interested in the action.

15 Dated this 28th day of May, 1993.

16 Michael J. Wierzbicki
17 MICHAEL J. WIERZBICKI, CP, CMRS
18 Registered Professional Reporter

19 STATE OF FLORIDA)
20) SS.
21 COUNTY OF ESCAMBIA)

22 The foregoing certificate was acknowledged
23 before me this 28th day of May, 1993, by Michael J.
24 Wierzbicki, who is personally known to me.

25 Patrick Baggett



PATRICK BAGGETT
NOTARY PUBLIC-STATE OF FLORIDA
COMMISSION EXPIRES APRIL 4, 1997
COMMISSION # CC273636