

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

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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:

CHARLES ANDREWS, JR.

TAKEN AT THE INSTANCE OF:

The Staff of the Florida
Public Service Commission

PLACE:

605 West Garden Street
Pensacola, Florida 32501

TIME:

Commenced at 4:00 p.m.
Concluded at 4:30 p.m.

DATE:

Monday, May 10, 1993

REPORTED BY:

Michael J. Wierzbicki, CP, CRMS
Registered Professional Reporter

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10 Florida Public Service Commission.

11 ROBERT G. BEATTY, Esquire, 150 West Flagler, Suite
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13 appearing on behalf of Southern Bell.

14 ALSO PRESENT:
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16 EARL POUCHER
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I N D E X

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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 WHEREUPON,

2 CHARLES ANDREWS, JR.

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 Mr. Andrews, would you please state your name,
8 and spell it for the court reporter?

9 A Charles, C-h-a-r-l-e-s, P. Do you want the
10 middle name?

11 Q Yes, please.

12 A P-u-i-t-o-n, Puiton, Andrews, A-n-d-r-e-w-s, Jr.

13 Q And what's your address, please?

14 A 6915 Nine Mile Road -- Pine Forest Road.

15 Q Is that Pensacola?

16 A Uh-huh (indicating affirmatively).

17 Q And the zip code?

18 A I think it's 26.

19 Q You need to give me all five numbers.

20 A 32526.

21 Q And is that a business address?

22 A Uh-huh (indicating affirmatively).

23 Q And your phone number?

24 A 944-0005.

25 Q And what is your present position with the

1 company?

2 A Cable splicer, if you can spell it, or facility
3 technician.

4 Q And how long have you held that position?

5 A A facility technician?

6 Q Uh-huh (indicating affirmatively).

7 A For 13 years.

8 Q And has all of that time been in Pensacola?

9 A Uh-huh (indicating affirmatively).

10 Q Have you talked to anybody else besides the
11 company attorney about your deposition here today?

12 A As in what?

13 Q Any possible questions or answers that you may
14 have.

15 A Uh-uh (indicating negatively).

16 Q Other than maybe just being here?

17 A Other than to being here.

18 Q Has anyone given you any assurances that you
19 would not be disciplined for whatever answers you give us
20 here today?

21 A Yes.

22 Q Has anyone advised you about the possible
23 criminal penalties that could apply if you perjure your
24 testimony here today?

25 A Yes.

1 Q Have you made any statements to the company with
2 their investigation?

3 A Uh-huh (indicating affirmatively).

4 Q Can you tell me about when you did that?

5 A About a year ago.

6 Q And who was in the room when you did that?

7 A The security guy. I have no -- I think his name
8 was Ken or something like that. I don't even remember.

9 Q Was there an attorney there?

10 A The -- there was an attorney we talked to, and I
11 don't know who he was, for the company, and then there was a
12 guy that was in security, and it was an internal, you know --

13 Q Was there someone from the union there?

14 A No.

15 Q Was your supervisor there?

16 A No.

17 Q Was anybody else there besides these two people?

18 A That's it.

19 Q That's it?

20 A Uh-huh (indicating affirmatively).

21 Q Are you a member of the union?

22 A Uh-huh (indicating affirmatively).

23 Q Who is your union representative?

24 A Which one? Sakalarios is the president.

25 Q And what about your steward, your shop steward?

1 A We really have numerous ones.

2 Q Which one would you report to; who would you
3 report to?

4 A Whichever one I chose.

5 Q So you have what, three or four?

6 A Blackwell, Grover Blackwell.

7 Q And what other union shop stewards would be
8 available for you to report to?

9 A Don Hall, Clarice.

10 Q I didn't get that name. I'm sorry.

11 A Clarice.

12 Q C-l-a-r-i-

13 A (Interposing) Don't ask me.

14 Q Clarice. Okay.

15 A Clarice Roudoh.

16 Q Can you spell her last name?

17 A R-o-u-d-o-h. It's French, anyway.

18 Q So you have Mr. -- is it Mr. Blackwell?

19 A Uh-huh (indicating affirmatively).

20 Q Mr. Hall and Ms. Roudoh?

21 A Uh-huh (indicating affirmatively).

22 Q Who's your present supervisor, first level?

23 A Cousins, Mike Cousins.

24 Q And how long has Mr. Cousins been your
25 supervisor?

1 A Couple of months.

2 Q Who was it before Mr. Cousins?

3 A Lovelace, Johnny Lovelace.

4 Q And how long was Mr. Lovelace your supervisor?

5 A On and off, for four or five years.

6 Q And can you recall who it was before Mr.

7 Lovelace?

8 A Jim Cole -- well, when you say before Lovelace,
9 I worked for him, not worked for him, worked for him, not
10 worked for him.

11 Q Okay. Well, then just tell me who your other
12 first-level supervisors are that you can remember.

13 A Jim Cole, Ozzie Teeters.

14 Q And that's T-e-e- --

15 A t-e-r-s.

16 Q Okay.

17 A Donald Spencer. Now, do you want me to go past
18 that FT part?

19 Q No. What did you do before you were an FT?

20 A I've been a coin collector, an installer, a
21 frame man, a cable repairman, and a facility technician,
22 which means you're a cable repairman and a cable splicer
23 together.

24 Q When were you a frame attendant?

25 A In probably '69.

1 Q And when did you do cable repair tech; when were
2 you cable repair tech?

3 A I started cable repair, I'm going to guess,
4 around '73, '4.

5 Q And when were you installing?

6 A After frame, which would be starting in about
7 '69.

8 Q Who's your present second-level manager?

9 A Tony Devito.

10 Q And do you remember who it was before Mr.
11 Devito?

12 A Bill Humphreys.

13 Q And do you remember any other second levels that
14 you've had?

15 A (Witness pointing.)

16 Q Mr. Poucher?

17 A Uh-huh (indicating affirmatively).

18 Q Second level or operation manager?

19 A I don't know. Whatever he -- oh, yeah, he was
20 operational manager, that's right.

21 Q Do you remember any other second level?

22 THE WITNESS: Who was the second level under
23 you?

24 MR. BEATTY: Just respond to her questions.

25 A I don't remember. I don't remember. He

1 probably would.

2 Q (By Ms. Richardson) So you've had Mr. Devito
3 and Mr. Humphreys?

4 A Uh-huh (indicating affirmatively).

5 Q And those are the two that you can recall?

6 A Uh-huh (indicating affirmatively).

7 Q And what about operation managers, who's your
8 present operation manager?

9 A St. Amant.

10 Q So you've had Mr. St. Amant and Mr. Poucher. Do
11 you remember any others?

12 A Mr. Mann. And before that, I wouldn't have -- I
13 was so low on the totem pole, I wouldn't have cared.

14 Q Mr. Andrews, have you ever heard the phrase
15 backing up the time?

16 A Uh-huh (indicating affirmatively).

17 Q And what's your understanding of that?

18 A What do you mean?

19 Q When you hear the phrase backing up the time,
20 what is your understanding of what that means?

21 A Are you referring to the company?

22 Q Yes.

23 A That you would back up the time on showing the
24 trouble cleared.

25 Q And is your understanding that that would be

1 proper to do that or improper?

2 A When we were doing it, it was proper.

3 Q And what were you doing on backing up the time?

4 A You would back up the time to where you were
5 inside the 24-hour limit.

6 Q Whether the trouble was fixed within 24 or not?

7 A Uh-huh (indicating affirmatively).

8 Q

9

10 A

11 Q is that the same thing?

12 A Uh-huh (indicating affirmatively),

13 Q That's okay. You don't have to remember. I
14 just want to make sure we're not talking about two different
15 people, that we've got the same person.

16 Q And about what time, what period of years was
17 this when you were doing that?

18 A About five years ago.

19 Q So '88, '89?

20 A Yeah. I mean, I'm just guessing.

21 Q And what instructions did you get from
22 about backing-

23 A (Interposing) To back up the time to show it
24 within the 24 hour.

25 Q Did he give this to you in writing or just tell

1 you?

2 A Tell me.

3 Q Are you the only facility tech he told?

4 A No.

5 Q Who else did he tell?

6 A This will be a guess, because it's been a long
7 time back.

8 Q Okay.

9 A Let's see. Ronnie Maxwell, David McDuffie, Don
10 Hall, I think. I really can't recall any more. I mean,
11 there was more, I think there was 14 of us, but I can't
12 recall.

13 Q And do you recall what his instructions-

14 A (Interposing) Oh, Bud Waters and Bill Waters.

15 Q Were they brothers?

16 A Yeah. They still are, I hope.

17 Q And do you recall specific
18 instructions about what you were to do?

19 A Basically, we were trying to not go over 24
20 hours on anything.

21 Q So if you did have an out-of-service report that
22 was over 24 hours, what were you supposed to do?

23 A Show it to a different code.

24 Q All right. When you say show it to a different
25 code, what code are we talking about?

1 A Lightning.

2 Q And why would you show it for lightning?

3 A Because the FC -- FAA, FCC, anyway, they had
4 ruled that lightning would not be counted as an over 24.

5 Q And would you use lightning whether or not it
6 was really a lightning problem?

7 A Right.

8 Q And in terms of backing up the -- was it the
9 clearing time on the report that you backed up?

10 A Uh-huh (indicating affirmatively).

11 Q Would you back up that clearing time even though
12 you hadn't completed the service?

13 A Uh-huh (indicating affirmatively).

14 Q And did you say you felt that that was proper at
15 the time?

16 A To us, we thought we were just playing with the
17 Southern Bell index.

18 Q Do you know that the Public Service Commission
19 requires the company to complete out-of-service reports
20 within 24 hours at least 95 percent of the time?

21 A No, we didn't.

22 Q Do you know it now?

23 A Yeah.

24 Q Do you know whether or not customers were due a
25 rebate if their service is out more than 24 hours?

1 A Uh-huh (indicating affirmatively).

2 Q And how long have you known that?

3 A Well, we knew of it, but it wasn't -- you know,
4 like I said, to us it was just an index.

5 Q Were there any other specific disposition or
6 cause codes that you used other than lightning in order to
7 keep a report out of that 24 count?

8 A Multiple, a multiple trouble.

9 Q Is that a multiple cable?

10 A Uh-huh (indicating affirmatively), it's 0320, I
11 think it was.

12 Q And what is a multiple cable failure; can you
13 define what that is?

14 A If more than five or six lines are out, it's
15 considered a multiple.

16 Q And so would you be instructed to use it on less
17 than five or six lines?

18 A No. That was just a code you could use. That,
19 generally, was not used, because if you went on a multiple,
20 you went on a multiple, and that was usually legitimate.

21 Q So can you think of any others then besides
22 lightning that were used?

23 A No, that was the only two you could use.

24 Q I'm going to show you a document, Mr. Andrews,
25 and this was filed on April 1, 1993 by the company in the

1 consolidated rate case docket, and it is Southern Bell's
2 Response to Preliminary Order Number PSC 930263 PCOTL entered
3 on February 19, 1993, and on this page at Number 10, there is
4 a Charles P. Andrews, Jr. And I'd like to ask you first
5 whether or not you remember having seen this document before?

6 A Oh, this document?

7 Q Uh-huh (indicating affirmatively).

8 A I thought you were talking about that one.

9 Q Well, it's all one piece, it's all together.

10 A Oh, okay. This, yes.

11 Q Is this your name on Line 10, are you that
12 Charles Andrews?

13 A Yes.

14 Q And have you had a chance to read Paragraph 2
15 yet?

16 A No.

17 Q We'll go off the record for a minute and let you
18 read Paragraph 2.

19 (A discussion was held off the record.)

20 Q (By Ms. Richardson) What I'd like to do is ask
21 you about Number 17 by your name. Is there a 17 after your
22 name?

23 A Uh-huh (indicating affirmatively).

24 Q And looking on the company's list, I think
25 Number 17 says something about intimidation or pressure, and

1 I'd like to know what you know about intimidation or
2 pressure.

3 A That's a very broad question.

4 Q Yes, and it's the company's list.

5 A You mean to back up the time?

6 Q Yes, let's try that.

7 A It wasn't really pressure. I mean, it was more
8 like a game. I mean, it wasn't -- you know, they didn't come
9 out and threaten you or anything. It was more that we were
10 -- it was a game.

11 Could I have some water?

12 MR. BEATTY: Sure.

13 (A brief recess.)

14 Q (By Ms. Richardson) I believe that we were
15 talking about intimidation and pressure before we took a
16 break.

17 A Okay. We really weren't intimidated or
18 pressured into doing -- in backing up our time or anything.

19 Q What about using, for instance, the lightning
20 code?

21 MR. BEATTY: Objection to the form of the
22 question.

23 Q (By Ms. Richardson) Did you feel any
24 intimidation or pressure in using the lightning code?

25 A No. Like I said, we didn't know we were doing

1 anything wrong.

2 Q Do you know of anyone who has been disciplined
3 by a manager for not using special exempt codes?

4 A No.

5 Q Do you know of anyone who was discipline by a
6 manager for not backing up their time?

7 A No.

8 Q Do you know of anyone who was disciplined by a
9 manager for not meeting that 24-hour commitment?

10 A Uh-uh (indicating negatively).

11 Q Do you know of anybody who's filed a grievance
12 because of instructions they received from the manager that
13 they felt were improper?

14 A No.

15 Q Do you know of anyone that's been disciplined in
16 relation to the company's investigation?

17 A No, not really.

18 Q Were you ever disciplined for your handling of
19 trouble reports?

20 A No.

21 Q Do you know where is now?

22 A No.

23 Q Is he still with the company?

24 A No. He retired.

25 Q He retired?

1 A Uh-huh (indicating affirmatively).

2 Q But you don't know where he's living now?

3 A No. I used -- I assume he's still at his house.

4 I don't remember where it is. I know the area, but not
5 specifically.

6 Q Is it in Pensacola?

7 A Uh-huh (indicating affirmatively).

8 Q You mentioned a Mr. Humphreys too. Do you know
9 where Mr. Humphreys is?

10 A He used to live down off of

11 Q Do you know if he's retired or with the company?

12 A He's retired.

13 Q What about Mr. Maxwell, is he still with the
14 company?

15 A Yes.

16 Q Is he still here in Pensacola?

17 A Right now he's in Miami.

18 Q Is that a temporary assignment?

19 A Uh-huh (indicating affirmatively).

20 Q Did he move to Miami for this assignment?

21 A No. He was just loaned down there after the
22 hurricane.

23 Q What about Mr. Waters, both Bud and Bill, are
24 they still with the company?

25 A (Witness nodded affirmatively.)

1 Q I'm sorry. He can't take a nod. You have to
2 say yes or no.

3 A Oh, yes, yes.

4 Q Are they still here in Pensacola?

5 A Yes.

6 Q Do you know what the no-access code is?

7 A Yeah.

8 Q Can you briefly describe what a no-access code
9 is?

10 A We wasn't really -- in reference to being an FT,
11 we wouldn't be -- we wouldn't be involved in a no access.

12 Q What about-

13 A (Interposing) But I was also an installer, and
14 the no access is when you go there and nobody's at home.

15 Q And that was back in 1969?

16 A Yeah.

17 Q So the last time you had occasion to use no
18 access was '69, that time frame?

19 A We would rarely use it, but, I mean, if you --
20 if somebody had a lock on their gate and you couldn't get in
21 their backyard or something like that. It was very rare.

22 Q Have you heard of anybody using a no access
23 without dispatching?

24 A No.

25 Q Do you know if that no access stops that 24-hour

1 clock?

2 A No. That would be in a different group of
3 people than us.

4 Q Do you ever have occasion to status reports as
5 out of service yourself?

6 A No. That would be the MA's, the inside people.

7 Q And when reports come to you, are they already
8 statused out of service and affecting service?

9 A Yes.

10 Q Do you ever have occasion to change that status
11 once you've gone out and looked at it?

12 A You can't.

13 Q Let me ask you a hypothetical question.

14 Let's say you got a service-affecting report,
15 maybe there was noise on the line, and when you got out there
16 to fix the problem, what you found out was there was no dial
17 tone. And this is really now an out-of-service report,
18 because the customer can't use the phones at all. Do you
19 ever discuss that with the MA about, you know, you sent me a
20 service affecting and it's out of service now, so we need to
21 change the status?

22 A They -- I don't know even know if they can
23 status -- if they can change the status, because generally it
24 worked in the reserve.

25 Q Usually it came in as an out of service, and

1 ended up-

2 A (Interposing) And it wasn't.

3 Q And it wasn't?

4 A Uh-huh (indicating affirmatively).

5 Q Did you ever have an occasion where a manager
6 has instructed you to contact him before closing out an
7 out-of-service report?

8 A Yes.

9 Q And when was this?

10 A I mean, you just asked if I had an occasion. I
11 don't know when.

12 Q Oh, okay. Who then, which manager?

13 A

14 Q And do you know why he was doing this, why he
15 was telling you to call in before closing out the out of
16 services?

17 A Certain times it would be -- with him, it would
18 be to make sure that he would tell you what time he needed to
19 close it out. But with other bosses, it would be just to ask
20 you what did you find.

21 Q To make sure that you were using the proper code
22 or not?

23 A Well, just to find out that it possibly might
24 have tied in with something that somebody else made a mistake
25 doing.

1 Q Do you know anybody who's used somebody else's
2 employee code for statusing reports?

3 A What do you mean?

4 Q Have you ever had someone use your employee code
5 that you knew about?

6 A No.

7 Q Has anyone, a manager, ever come to you with a
8 report with your code on it but you weren't the one who put
9 it there?

10 A No.

11 Q Do you know of anyone that that has happened to
12 before?

13 A Uh-uh (indicating negatively).

14 Q Do you know of anybody who has taken an
15 out-of-service report, and that's about to go out over 24,
16 close it out, and then reopen it as an employee report in
17 order to really fix the trouble at closing?

18 A Uh-uh (indicating negatively).

19 Q Have you heard of that being done?

20 A Yeah, but not -- you know, I heard of that being
21 done. I don't remember if we did that. I don't think we
22 did.

23 Q Have you heard of it being done in Pensacola?

24 A I think so, but I really don't -- generally you
25 would fix it, but if you weren't through, then you were able

1 to close it out and then go back and report it.

2 Q Do you know under which managers this was being
3 done?

4 A Probably all of them.

5 Q But do you-

6 A (Interposing) What I'm saying is that you would
7 restore the service to the people, but you wouldn't be
8 through.

9 Q So you would do an EO report to go back and do
10 routine work?

11 A Right.

12 Q What I'm saying is that it was an out of service
13 and it wasn't fixed and you closed it.

14 A No.

15 Q So you don't know of that ever happening?

16 A No.

17 Q Have you ever heard of that happening?

18 A No, not really.

19 Q Do you know of anybody who has taken and
20 extended a commitment time or an appointment time with a
21 customer without contacting the customer?

22 A No.

23 Q Do you know how to exclude reports?

24 A No.

25 Q Do you ever exclude reports on final status; has

1 there ever been an occasion?

2 A When you say exclude reports, what do you mean?

3 Q On a final status screen when you've got-

4 A (Interposing) We don't have a final status
5 screen.

6 Q Well, before you had a -- well, let me start
7 over again. Do you use a CAT terminal?

8 A Yeah, but not -- we didn't then.

9 Q With your CAT screen, did you not have a screen
10 for clearing and closing a report?

11 A Uh-huh (indicating affirmatively).

12 Q Then let me use your clearing and closing
13 screen. Is that what it's called?

14 A Oh, on a CAT, the only way we could close it was
15 the exact time you closed it, you closed it.

16 Q Has that always been the case?

17 A I haven't used the CAT's that long.

18 Q Oh, you haven't?

19 A No. As far as excluding a trouble, I wouldn't
20 have any earthly idea how to do it. We can barely get
21 through closing it.

22 Q Do you know of anybody who's created fictitious
23 trouble reports?

24 A No.

25 Q Have you ever heard the phrase building the

1 A Well, when you say worked in sales, I was an
2 installer and sold.

3 Q Have you been selling or have you had occasion
4 to sell any services or products since 1980?

5 A Uh-huh (indicating affirmatively).

6 Q And has that been part of your facility
7 technician position?

8 A For a short, probably, month, if that long. It
9 was just, really, a sales promotion.

10 Q Did the company give prizes and awards for
11 sales?

12 A Uh-huh (indicating affirmatively).

13 Q Did you get anything?

14 A Uh-huh (indicating affirmatively).

15 Q What did you get?

16 A Luggage, a hammock, and a set of pens.

17 Q You must've been pretty good. How much did you
18 sell?

19 A I really don't even -- I don't even remember,
20 but, yeah, we sold a lot.

21 Q Did the company give you any special training to
22 do that sales?

23 A They showed us how to fill out the forms and how
24 to talk to the people.

25 Q And when you say forms, what forms are you

1 talking about?

2 A That has been -- I couldn't even tell you. I
3 don't even remember. But we just had some kind of little
4 forms where you checked the box.

5 Q They want this wire maintenance plan or they
6 want this feature?

7 A Oh, no. What we would sell would be call
8 waiting, call forwarding.

9 Q And so all of those were listed on the form, and
10 you just checked the box for the one?

11 A If you could sell it to them, yes.

12 Q Did the company encourage you to sell every
13 feature to the customers you talked to?

14 A Uh-huh (indicating affirmatively).

15 Q Are you familiar with the wire maintenance plan
16 that the company had?

17 A No, we weren't selling like that.

18 Q Do you know of anybody who recorded a sale to a
19 customer without contacting that customer?

20 A No.

21 Q Do you know of anyone who recorded a sale to a
22 customer without the customer's approval?

23 A No. All of our sales were up front.

24 Q Were you directed on keeping track of your time
25 spent doing sales?

1 A No.

2 Q Did you on your own keep track of the time you
3 spent on doing sales?

4 A No.

5 Q And which manager did you report to during this
6 program?

7 A This was the first time I worked for Teeters.

8 Q First time you worked for Mr. Teeters. And when
9 was the first time you worked for Mr. Teeters when this sales
10 thing was going that you won the prizes for?

11 A I'd say probably in the eighties.

12 Q Late eighties, mid eighties?

13 A Mid eighties.

14 Q Have you ever had the test center call you while
15 you were out there working on an out-of-service report and
16 tell you to close it out now whether you were done or not?

17 A Uh-uh (indicating negatively).

18 Q Have you ever had the test center close out your
19 out-of-service reports without telling you?

20 A Not that I remember, no.

21 MS. RICHARDSON: Mr. Andrews, I want to thank
22 you for your time. I don't have any more questions,
23 but someone around the table may have one or two
24 before you go. Thank you very much for shifting your
25 schedule so that you could be here this afternoon.

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THE WITNESS: All right.
MS. WILSON: I have nothing. Thank you.
MR. BEATTY: Okay. Thank you.
MS. RICHARDSON: Thank you, Mr. Andrews.
WHEREUPON, the deposition was concluded.

