

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL

**CERTIFIED  
COPY**

In re: Petition on behalf of CITIZENS  
OF THE STATE OF FLORIDA to initiate  
investigation into integrity of SOUTHERN  
BELL TELEPHONE & TELEGRAPH COMPANY'S  
repair service activities and reports.

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DEPOSITION OF JAMES BRYANT, TAKEN AT THE  
INSTANCE OF THE OFFICE OF THE PUBLIC COUNSEL.  
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Lake Worth, Florida  
June 14, 1993  
3:13 p.m. - 4:32 p.m.

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## 1 APPEARANCES:

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21 BY: ROBERT G. BEATTY, ESQUIRE

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I N D E X

WITNESS: JAMES BRYANT

	Direct	Cross	Redirect	Recross
BY: MS. RICHARDSON	5			
BY: MR. GREER		51		

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E X H I B I T S  
(NO EXHIBITS)

\* \* \* \* \*

STIPULATION

It is hereby stipulated and agreed by and between counsel for the respective parties that:

MR. BEATTY: I am going to make one statement, and that is the company has represented to each and every employee in this city and in every city that with regard to the depositions in this proceeding that no employee will be disciplined based upon their testimony in this proceeding, provided they have testified truthfully.

\* \* \* \* \*

The deposition of JAMES BRYANT was taken before me, KIMBERLY C. AYERS, Professional Reporter and Notary Public, State of Florida at Large, at 120 North K Street, City of Lake Worth, County of Palm Beach, State of Florida, beginning at the hour of 3:13 p.m. on June 14, 1993, pursuant to Notice filed herein, at the instance of the Office of the Public Counsel, in the above-titled cause.

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THEREUPON,

JAMES BRYANT,

Being by me first duly sworn to testify the whole truth as hereinafter certified, testifies as follows:

## DIRECT EXAMINATION

1  
2 BY MS. RICHARDSON:

3 Q. Mr. Bryant, would you please state your name and  
4 spell it for the court reporter?

5 A. James Bryant, B-r-y-a-n-t.

6 Q. And your address, please?

7 A.

8 Q. And your phone number?

9 A.

10 Q. And what is your present position with the  
11 company?

12 A. I'm assistant manager in the maintenance center.

13 Q. And what pay rate is that? Are you first level,  
14 second level?

15 A. I'm first level.

16 Q. Have you talked with anyone about your deposition  
17 here today, other than Southern Bell's attorney?

18 A. My wife knows that I'm having a deposition, stuff  
19 like that. But basically that's it. She doesn't know  
20 what's going to be asked or what I'm going to respond.

21 Q. Have you discussed any possible questions or  
22 answers with anybody else other than the attorneys?

23 A. Not really.

24 Q. Has anyone given you any assurances that you  
25 would not be disciplined based upon your answers here today?

1 A. No.

2 Q. Has anyone discussed with you the possible  
3 criminal penalties if you perjure your testimony here today?

4 A. No, they have not.

5 Q. I guess this is a good time. If at any point I  
6 ask you a question that you don't understand, that you want  
7 some clarification on, I want you to feel free to stop me  
8 and ask whatever you need to ask. Or if you need to ask  
9 Mr. Beatty a question and you want it off the record, we can  
10 go off the record and you can do that. How long have you  
11 been an assistant manager?

12 A. About 20 years.

13 Q. Has all of that time been in the West Palm Beach  
14 area?

15 A. No, it has not.

16 Q. How long have you been an assistant manager in  
17 this area?

18 A. Approximately eight years.

19 Q. Where were you before West Palm?

20 A. Pompano. Before that Margate, and before that  
21 Ft. Lauderdale.

22 Q. Is Margate a Broward county?

23 A. It's North Broward now. It's been consolidated.

24 Q. Who's your present -- who's the manager one level  
25 above you?

1 A. Paul White.

2 Q. Can you spell his last name?

3 A. W-h-i-t-e.

4 Q. Tom?

5 A. Paul White.

6 Q. I'm sorry. Paul instead of Tom. Paul White.

7 And how long has Mr. White been your manager, your  
8 supervisor?

9 A. Since March.

10 Q. Who was it before Mr. White?

11 A. I was over in engineering for about a year and it  
12 was -- I had about four different second levels in about a  
13 years time.

14 Q. Can you tell me how many you can recall?

15 A. The last one I had was Jose Lopez.

16 Q. And do you remember?

17 A. Before that Val, V-a-l, that's his first name,  
18 Bormanis, B-o-r-m-a-n-i-s. And before that Steve Miller.

19 Q. And how long were you in engineering?

20 A. This last time one year.

21 Q. And was that 1989, '90?

22 A. I just came back in March of this year. So, it  
23 was like '92 -- from March of '92 to March of '93.

24 Q. And what were your duties in engineering; what  
25 did they involve?

1           A.    I was assigned the responsibility of maintaining  
2 circuits once they were installed.  And if the customer was  
3 to move out of those facilities, replan so the next customer  
4 that moves -- in the service would be available in just a  
5 very short time after the request was made.  It was a  
6 position called CT administrator.

7           Q.    Was there ever any problem in maintaining --  
8 having enough circuits to meet the requests for service?

9           A.    It would depend on how many circuits a particular  
10 customer is going to need.  But with the growth of faxing  
11 and computers, sometimes there's been delays in providing  
12 services.  We'll have two lines and they'll need three.

13          Q.    Were there ever any delays because outside plant  
14 was not properly maintained?

15          A.    I couldn't say that would ever be a case.

16          Q.    What did you do before 1992?

17          A.    I was in the maintenance center here.

18          Q.    Back here.  And briefly then, outside of Lake  
19 Worth between Pompano, Margate and Ft. Lauderdale, in those  
20 particular maintenance centers did you deal with handling  
21 customer trouble records?

22          A.    Yes.

23          Q.    In all three?

24          A.    Right.

25          Q.    Have you always been an assistant manager for the



1 company?

2 A. No. I used to work for the company three  
3 different times. The first time I worked for them I was a  
4 verbal office installer for Western Electric. I worked  
5 there for four years. I quit and went to work the following  
6 week as a frame man -- frame attendant. It was in 1968.  
7 And I worked for about six months, then I quit and went to  
8 college for a couple of years and came back to Southern Bell  
9 and was hired on as an outside repairman.

10 Q. When you were an outside service technician, did  
11 you do installation and repair?

12 A. Yes, I did. It was '69 and '70. Part of '69,  
13 '70, '71.

14 Q. Mr. Bryant, I think what I'm going to do is to  
15 show you a document. Let me see if I can find it. This is  
16 Southern Bells response to preliminary order  
17 PSC-93-0263-PCO-TL entered on February 19, 1993. It was  
18 filed by the company in the consolidated rate case docket on  
19 April 1st, 1993. And on page five at number 64 there is a  
20 James Bryant. And I would like you to look at that and tell  
21 me is that you?

22 A. Yes, it is.

23 Q. Have you seen this document?

24 A. Yes.

25 Q. Are you prepared to answer questions that I may

1 have?

2 A. Sure.

3 Q. On this particular document there's a list of  
4 numbers following your name that correspond to a list of  
5 items about information or about items that you may have  
6 some information on. And the first one is a number one, I  
7 believe. That indicates backing up clearing and closing  
8 times. And I'd like to know what information you have about  
9 backing up clearing and closing times on trouble reports?

10 A. The way you ask that it kind of opens the door  
11 for discourse. My people --

12 MR. BEATTY: In that case I'm going to object  
13 on the grounds that the question is ambiguous.

14 BY MS. RICHARDSON:

15 Q. All right. Have you ever instructed your  
16 employees, people that you supervise, to back up clearing  
17 times on trouble reports?

18 A. Actually quite the opposite. No, they have never  
19 been instructed to do anything above board. The only time  
20 we would back something up would be like if a customer would  
21 call in late today when our office is not manned, you would  
22 call the customer back to see if dispatch is necessary. They  
23 say, no, the line is working now. I instruct my people to  
24 ask what time the customer's line was working. If they  
25 give us a time, we would back it up to that time.

1 Q. Are you aware of the company's requirement that  
2 out of service reports be cleared within 24 hours?

3 A. Oh, yes.

4 Q. Are you aware that that should be done at least  
5 95% of the time?

6 A. Yes.

7 Q. And has that always been the case?

8 A. It seems like that's been the number that I  
9 remember for years.

10 Q. Do you know of anyone who has backed up clearing  
11 times in order to meet that out of service over 24 hour  
12 requirement?

13 A. The only people I would have any knowledge of  
14 would be the people who report directly to me. I also have  
15 the evaluations for the MAs, going back to see what they  
16 did. I'd have to say no to that. I might see an error and  
17 I would come back and retrain that person. The way you ask  
18 it, no, not with that intent.

19 Q. Have you ever heard of anyone doing that within  
20 the company?

21 A. I have, but it's all hearsay. Nothing that I  
22 would put any validity to because of it being hearsay.

23 Q. These rumors that you've heard, have they been in  
24 the West Palm Beach area that you've heard of these people  
25 backing up clearing times to meet the 24 hour index?

1           A. I really don't -- it's been like more than one  
2 place I've heard of it being done. But again, it's hearsay.  
3 Whether it has been done or not, I really couldn't attest  
4 to.

5           Q. And the hearsay that you've heard, has that been  
6 among managers, or among maintenance administrators, or  
7 among whom?

8           A. I would say probably managers.

9           Q. Managers that you have worked with talking about  
10 these matters?

11          A. It was more or less like this bureau is doing  
12 this, this bureau is doing that. And that's really all I  
13 know.

14          Q. Did you hear of a particular bureau, then,  
15 backing up times in this hearsay, in this rumor?

16          A. Yeah. But again, like I say it's -- since there  
17 is a competitive type environment, each one wants to do as  
18 well as they can. One bureau when they don't do well  
19 sometimes they might say, well, so and so is doing this or  
20 that. Then again you have that coming from the loser. How  
21 much credibility are you going to give their testimony.  
22 It's just rumor. It's not something I would bank on.

23          Q. All right. I'm still going to ask you one more  
24 time. Which bureau have you heard the rumor that they were  
25 backing up the time?

1 A. South Broward, North Broward, this bureau.

2 Q. Number two is by your name. Number two indicates  
3 that you may have some information about using cause codes.  
4 What's a cause code?

5 A. That would be the condition that actually caused  
6 a particular -- which caused the customer to be out of  
7 service or have the service less than normal.

8 Q. For example, would a customer action be a cause  
9 code?

10 A. Sure.

11 Q. What about weather. Is weather a cause code?

12 A. Yes.

13 Q. Lightening, for instance?

14 A. Yes.

15 Q. Moisture?

16 A. Yes.

17 Q. Is there a cause code for unknown conditions?

18 A. Yes, there is.

19 Q. Are certain cause codes -- or do certain cause  
20 codes, when used for out of service reports, take that  
21 report out of the index? In other words, that report would  
22 not count as a miss because it was closed to moisture, for  
23 instance, on that 24 hour index; do you know?

24 A. As far as the PSC report -- as far as the company  
25 report, I don't think so.

1 Q. Well, let's talk about the PSC report then. Is  
2 moisture one of those codes that would exclude an out of  
3 service report from the PSC index?

4 A. I'm not sure that moisture is. I really don't  
5 remember. Part of the reason I'm not up on this is if you  
6 cover your people and have your people do everything like it  
7 should be, then you really don't need to know what counts  
8 and what doesn't count. Because whether it counts is really  
9 irrelevant as to what the trouble caused was. My people  
10 have been instructed to put that cause down, not to find a  
11 cause that's going to make a result.

12 Q. All right. Do you know of any managers who used,  
13 for instance, lightening codes in order to exclude out of  
14 service over 24 hour reports when lightening was not prone?

15 A. I can't say I do.

16 Q. Moisture is a pretty broad code, isn't it? It  
17 covers a lot of different kinds of problems?

18 A. I would think so.

19 Q. Do you have or have you ever had STs or MAs  
20 question you about using the moisture code when for instance  
21 the sheath had broken, either it was just defective or a  
22 squirrel bit through it, or there was some problem, but the  
23 moisture code was used instead of say a squirrel bite or  
24 defective cable; has that ever been a question that's come  
25 up for you to deal with?

1           A.    Not that, but I have actually discussed that with  
2 my employees. Like I would ask them where the moisture was  
3 at. If it's in the splice case, maybe the splice case  
4 wasn't sealed properly and not to use that code. Why did it  
5 get wet. Was it due to the weather, was it because we  
6 didn't close up the terminal. That's not moisture.

7           Q.    Do you know of other managers who instructed  
8 their people to close out those type of reports to moisture?

9           A.    I can't say that I do.

10          Q.    Have you had an MA or ST come to you and say,  
11 well, my other manager said I'm supposed to close it out to  
12 moisture; those kind of instances you just told me about?

13          A.    If I have what I've done -- I'm not saying that I  
14 do. I can't recall anything right now. But I know in any  
15 kind of situation similar to that would be to override the  
16 other supervisor. Because I was in charge of the  
17 evaluations, and I would tell them the way it should be and  
18 insist they close it out that way.

19          Q.    Have you ever heard of rumors -- let me rephrase  
20 that. Have you ever heard of other managers deliberately  
21 using these excludable cause codes in order to affect their  
22 index, PSC index?

23          A.    Not by name. Again, there was like this bureau  
24 is doing that, or that bureau is doing that. That's how  
25 they're making the results, that type of stuff.

1 Q. Did you ever have trouble making your results?

2 A. The results were -- I would say probably most of  
3 the time you do. And you should, in a way. Because  
4 otherwise maybe the results aren't where they should be. If  
5 everybody can attain them, they're probably too low.

6 Q. Okay. Have you ever had a second level manager  
7 counsel you or reprimand you for not meeting results, the  
8 PSC index results?

9 A. Formal counseling, no.

10 Q. How about informal warnings about you're not  
11 meeting --

12 A. Informal warnings, no.

13 Q. Have you ever had a manager come to you and  
14 express problems with the way you handled your people in  
15 meeting the PSC index results?

16 A. The way my people handle it?

17 Q. The way you've instructed your people to handle  
18 it, yes.

19 A. Sometimes there were questions that come up as  
20 far as gray area, and how wide a gray area we should  
21 consider.

22 Q. Would gray area be something like using a  
23 moisture code and you using it more tightly than other  
24 people, for instance?

25 A. (Witness nodding head.)



1 Q. Who's your operations manager?

2 A. Right now it's George Lewis.

3 Q. Who was it before Mr. Lewis?

4 A. Jean Davis.

5 Q. Have you ever seen memos from either Mr. Lewis or  
6 Mr. Davis stating that you have missed the PSC index and why  
7 have you done so?

8 A. No.

9 Q. Have you ever seen memos from Mr. Lewis or  
10 Mr. Davis saying don't miss the PSC index, this is very  
11 important, you need to make it every time, something of that  
12 nature?

13 MR. BEATTY: I object to form of the  
14 question. It's ambiguous. You may answer.

15 THE WITNESS: I've seen results come out  
16 showing what our results were, but nothing  
17 like -- maybe sometimes there will be a note at  
18 the top -- keep an eye on that bureau or  
19 something like that. Very informal. Just  
20 something to say, hey team, let's do what we can.

21 BY MS. RICHARDSON:

22 Q. Have you ever seen memos from Mr. Lewis or  
23 Mr. Davis where they say you've missed this by only three  
24 minutes, why?

25 A. Not a formal memo. Sometimes we'll see a copy of

1 a customer trouble report that was missed by two or three  
2 minutes. What happened, or something like that. Not by  
3 Mr. Lewis and usually -- well, sometimes by Mr. Davis, but  
4 not that often. Because generally he has other work to do  
5 rather be then be involved with day-to-day operations. In  
6 that part of it, anyway.

7 Q. Did you ever infer from these memos where an  
8 indication of only missing it by five minutes or less was an  
9 indication that you should back up the clearing time if it  
10 was only five minutes?

11 A. I never took it that way. How it was intended --  
12 the way I took it was we were just sloppy in the way we  
13 closed it out or was it cleared earlier. That's the way I  
14 passed it on to my people.

15 Q. I believe number three is by your name also, and  
16 that indicates that you may have some information about  
17 rebates for out of service over 24. Do you know if a  
18 customer is due a rebate if they're out of service more than  
19 24 hours?

20 A. Yes.

21 Q. Have you always known that?

22 A. Yes.

23 Q. Do you know of any customer that was denied a  
24 rebate because their trouble report was mishandled?

25 A. Not any customer in particular, but that has

1 happened. I know it has happened.

2 Q. Is there a way to identify those individuals,  
3 those customers, and make sure that they get a rebate later  
4 on?

5 A. How far back are you talking about? Are we  
6 talking about something that happened last week?

7 Q. For instance.

8 A. Sure. We can run reports that will tell us how  
9 the trouble was closed out, and if it was closed out  
10 improperly we can go back. But then it will have to be done  
11 manually.

12 Q. Do you know if a large number of historical  
13 rebates were processed for the West Palm Beach area in  
14 January of '92?

15 A. I'm not aware of that. Unless it had something  
16 to do with one of the settlements. I know there was  
17 different times the company did issue rebates. I'm not  
18 familiar with that particular one.

19 Q. Do you know whether any customers were denied  
20 rebates because of falsification of trouble reports?

21 A. Yeah.

22 Q. Can you tell me --

23 A. No customer in particular. I know that this  
24 happened.

25 Q. Tell me what happened.

1           A. Well, sometimes trouble reports would be excluded  
2 once it went over 24 hours, and that a new report would be  
3 made up to start the clock again.

4           Q. And when you say excluded, I've had MAs tell me  
5 that means putting an "X" in the final status screen; is  
6 that what we're talking about?

7           A. Right.

8           Q. Were those out of service reports then?

9           A. Some of them were, some of them could have been  
10 excluded for other reasons.

11          Q. And who was doing this?

12          A. I don't know everybody who was doing it. I know  
13 two cases where it was done by management.

14          Q. And which management --

15          A. Two manager's in the West Palm Center.

16          Q. And that occurred in the last eight years then?

17          A. Right.

18          Q. Which you've been here?

19          A. Right.

20          Q. And you have named for me Mr. Paul White. Was he  
21 one of the managers doing this?

22          A. Oh, I said managers. I mean assistant managers,  
23 first level people.

24          Q. All right. Which first level managers were doing  
25 that?



1 out of service that was excluded, can you give me an  
2 approximate year or approximate date when that occurred?

3 A. It was over here, so it was after they had moved  
4 into this building. Probably a year after they had moved  
5 into this building. I'm not sure of the dates.

6 Q. '87, '88?

7 A. No, it would have been later than that. Because  
8 there was no elevator for the building. It was about a year  
9 later that I came over.

10 Q. '89, '90?

11 A. I don't know the date.

12 Q. Okay.

13 Q. In your opinion, was excluding the out of service  
14 reports proper?

15 A. No.

16 Q. Did you form an opinion as to why that was being  
17 done?

18 A. I'm sorry.

19 Q. Did you form an opinion as to why and  
20 were closing out of service reports?

21 A. Yes.

22 Q. What was your opinion?

23 A. Well, I asked them directly and the reason they  
24 were doing it was because they had gone over -- well, the  
25 one was a special circuit because it had gone over four

1 hours. And the other was they had gone over 24 hours.

2 Q. So the one report was a special circuit?

3 A. Now, all of the sixteen may not have been out of  
4 service. They could have been excluded for other reasons. I  
5 remember the fact they were excluded and they shouldn't have  
6 been.

7 Q. Were they excluding the out of service reports in  
8 order to affect the PSC index?

9 MR. BEATTY: If you know. Well, I would  
10 object to the form of the question.

11 THE WITNESS: That's intent. I don't know.  
12 I can't tell what somebody's intent is.

13 BY MS. RICHARDSON:

14 Q. Did you ask them if they were excluding these  
15 reports in order to affect the PSC index?

16 A. No.

17 Q. Would the exclusion of out of service reports  
18 affect the PSC index?

19 A. (Witness nodding head.)

20 Q. And that's a yes?

21 A. Yes, I'm sorry.

22 Q. Now, by your name is also number four, use of CON  
23 codes. What is a CON code; what does that do?

24 A. It's a time we were using when a customer called  
25 in and requested a future due date. In other words, we were

1 offering tomorrow and they said, well, I'm not going to be  
2 home until Friday. We shouldn't be penalized because we do  
3 not have access to that customer's premises. If it was out  
4 of service and they request a future due date, we could put  
5 it as a CON and it would be removed from the report.

6 Q. So it was an excludable PSC code from the index?

7 A. Right.

8 Q. Do you know of anyone who has used that CON code  
9 other than the way you explained?

10 A. No.

11 Q. Is the CON code still used today?

12 A. No.

13 Q. Do you know why the company stopped using it?

14 A. My understanding was that it was part of the  
15 settlement that was recently reached. To just totally  
16 remove it so that CONs were not there.

17 Q. And what did the company replace the CON code  
18 with?

19 A. Nothing. We just -- my understanding is just  
20 bite the bullet and just pay rebates to those customers if  
21 they're out of service.

22 Q. Did you ever hear of the CON code being misused  
23 in any other IMC in Florida?

24 A. Yes.

25 Q. What did you hear?



1           A.    Again, it's just rumors.  No names, just this  
2 bureau is doing it or that bureau is doing it.

3           Q.    Did you hear which bureau was doing it?

4           A.    I heard North Broward and South Broward.  Again,  
5 these are going to be the names that come up because they're  
6 the ones that are in our same division.  Not the division,  
7 the same area.

8           Q.    These are the bureaus that you're in competition  
9 with?

10          A.    Basically, right.

11          Q.    By your name is also number six, and that  
12 indicates building a base of out of service troubles.  What  
13 is building the base of OOS?

14          A.    Well, building the base -- it seems like it has a  
15 connotation of taking -- of doing something wrong, but it's  
16 really not.  There is nothing wrong with that as long as you  
17 do it in all cases, over 24 and under 24.

18          Q.    Have you ever heard it being done with those  
19 under 24?

20          A.    Yeah, hearsay.  But again, nothing that I could  
21 attest to.

22          Q.    Have you ever heard of an employee building the  
23 base of out of services by creating fictitious reports?

24          A.    Just hearsay.  Cases in South Miami, one in the  
25 Miami bureau that I wouldn't put any validity to because it

1 was hearsay.

2 Q. Do you know of anyone who has built the base of  
3 out of service reports in Palm Beach or in the Palm area in  
4 order to meet the PSC index for out service?

5 A. I can't say that I do.

6 Q. Have you ever been --

7 A. It's more work to do something like that then to  
8 do the job right the first time.

9 Q. Have you seen a particular report, a daily report  
10 on out of services that indicates the number of total out of  
11 service reports for each IMC in this particular area and the  
12 number of additional out of service reports required to meet  
13 95%? Have you seen a report like that?

14 A. I can't say I have, not in recent years. If I  
15 had in the past it would not be a formal report, it would be  
16 a note on the side, we missed it had by two percent or we  
17 missed it by this much. So nothing with an intent, hey,  
18 let's add to it.

19 Q. By your name is also number eight. Instructions  
20 not to status out service or not statusing out of service or  
21 both.

22 MR. BEATTY: Object to the form of the  
23 question. It's ambiguous

24 THE WITNESS: I'm sorry?

25 MR. BEATTY: You can respond.

1 THE WITNESS: Oh. I can't recall being told  
2 to do anything like that myself.

3 BY MS. RICHARDSON:

4 Q. Have you ever heard of a manager instructing  
5 their MAs not to status any out of service reports today?

6 A. I don't think so.

7 Q. Have you ever heard of managers instructing their  
8 MAs to hold off statusing out of services until close out of  
9 the report?

10 A. Again, the same thing with the question just  
11 before that. It seems like vaguely I've heard something  
12 like this, but I can't tell you any detail. So, I know it  
13 wasn't said to me or in front of me or anything like that.

14 Q. Do you know of any managers in this area that  
15 you've worked with that have instructed their MAs not to  
16 status out of service until close out?

17 A. Nothing that I could attest to.

18 Q. Do you know of any managers who have instructed  
19 their people to contact them before closing out an out of  
20 service that was about to go over 24?

21 A. I don't think so.

22 Q. By your name is also number twelve. And number  
23 twelve says something about statusing troubles generally,  
24 including criteria for statusing out of service.

25 A. I'm sorry. We were flipping this. What was the

1 question again?

2 Q. By your name is also number twelve, statusting  
3 troubles generally? Do you know of any instances where  
4 trouble reports have been improperly statused in order to  
5 affect the PSC index?

6 MR. BEATTY: Other than what he may have  
7 already testified to?

8 BY MS. RICHARDSON:

9 Q. Other than what you've testified to.

10 A. No, I don't think so. Most of what I was  
11 involved with the out of service statusing, again, was to  
12 make sure the MAs were picking them up. I'd have like  
13 certain conditions, like the test or if the disposition code  
14 indicated that they were out of service and if the MA felt  
15 it wasn't, I would pull those. I have a report that I  
16 pulled each morning. I could see how many they had out of  
17 service and how many not out of service, and I could see  
18 what percent. And if something looked out of line, I would  
19 put that pull that persons total work and actually read each  
20 line to see what happened. And then if it should have been  
21 stroked out of service, I would go back and talk to that  
22 person.

23 Q. When you were doing this analysis, did you do an  
24 analysis on other manager's MAs also?

25 A. I did it for the whole center, yes.

1 Q. Did you ever find instances of activities in  
2 handling customer trouble reports that you felt indicated an  
3 intentional mishandling of reports in order to affect the  
4 PSC index or some other result?

5 A. Just like I was saying before, I just reviewed  
6 the close out work by each individual MA and I would bring  
7 it back to them to provide whatever training that I might  
8 feel is necessary or ask them additional questions. And I  
9 don't think I ever saw an intent on any of the MAs. I don't  
10 think they were concerned with making reports, they were  
11 just concerned with making a pay check.

12 Q. And when you talked to the MAs, did any of them  
13 tell you, well, my manager told me to do it that way?

14 A. Sometimes I get questions like that. It's not  
15 anything where I could say, okay, this is what this person  
16 is trying to cover. It could be a misunderstanding.

17 Q. In these discussions with the MAs that you had on  
18 the problems that you've had, did you ever form an opinion  
19 that managers were giving incorrect or improper instructions  
20 to the MAs on handling reports?

21 A. Again, it's a call. It's like that gray area.  
22 You know, how tight you want to run the ship. I might have  
23 had a small area, but that doesn't give you any intent on  
24 somebody's part to do anything wrong. They see it in a  
25 different light. I would try to get the MA to run a small

1 gray area as possible, because I think it's in the best  
2 interest of the business.

3 Q. Are you aware of the hotline number that the  
4 company has for reporting unethical conduct?

5 A. Yes.

6 Q. Have you ever had occasion to use it?

7 A. No.

8 Q. Well, what information did you get from the  
9 company in terms of ethics and handling customer trouble  
10 reports when the company published that hotline?

11 A. Well, the same thing that's always been there.  
12 The company has always put a high value on individuals, and  
13 also doing a job with a lot of integrity. So, I didn't see  
14 anything new there. Just the fact that, okay, here is an  
15 800 number to call if we have something to report.

16 Q. In terms of the analysis you were doing, were  
17 there any occasions where you found problems that had a  
18 hotline number been available in those days that you would  
19 have called the hotline number for those problems?

20 MR. BEATTY: Objection, calls for  
21 speculation. You can respond, if you can.

22 THE WITNESS: Normally -- this is just my own  
23 personal opinion -- if I refer something to my  
24 immediate supervisor and I can't get it handled,  
25 generally it doesn't pay to go any higher. I



1 employee's codes to status reports?

2 A. Not -- I can't say that I have. Not that I would  
3 believe.

4 Q. By your name also appears number fifteen,  
5 exclusion or elimination of trouble reports. Is there  
6 anything you can add that you have not told me about with  
7 about improper exclusion of trouble  
8 reports?

9 A. Those are the only two instances that really  
10 stand out that I can remember.

11 Q. By your name is also number sixteen, customer  
12 direct reports reported as employee originated reports. What  
13 can you tell me about that?

14 MR. BEATTY: Object to the form of the  
15 question. It's ambiguous.

16 BY MS. RICHARDSON:

17 Q. Do you need me to rephrase?

18 A. I'd prefer if you would.

19 Q. At any time that that arises where you feel like  
20 my question is not specific enough or you would like to  
21 request me to rephrase it or ask it again, I'll be happy to  
22 try to do that. What is a customer direct report?

23 A. It's a report that's initiated by the customer.

24 Q. Could an employee who finds a problem on his own  
25 create a trouble report for a customer as an employee



1 originated report?

2 A. Yes.

3 Q. Is it proper to take a customer report and make  
4 it an employee originated report?

5 A. No.

6 Q. Do you know of any instances when that has been  
7 done?

8 A. Yes.

9 Q. Can you tell me about those, please?

10 A. Again -- I guess I would be more comfortable with  
11 the question if you could narrow it down so I don't go into  
12 a discourse.

13 Q. All right. Well, that may be difficult at this  
14 time because I've asked you a specific question and you told  
15 me you knew of instances. I don't know of the instances,  
16 you do. What instance were you thinking of when I asked my  
17 question?

18 A. One of the jobs I had when I was in the test  
19 center was to answer the customer line. The outside  
20 installer would have business cards they would give to the  
21 customer on repeat trouble reports where it seemed like the  
22 customer is reporting a trouble and it's taking us too long  
23 and we get out there and trouble is gone. So in an effort  
24 to try to capture the trouble at the time it's on the line,  
25 guys would give them this card with a special number on it,

1 which I would answer. And I was taking those reports as  
2 customer direct, and I was ordered to take them as employee  
3 reports.

4 Q. And in your opinion, should they have been  
5 customer direct reports?

6 A. I took them as customer direct reports.

7 Q. Were you disciplined for taking them as customer  
8 direct instead of employee reports?

9 A. Not directly, indirectly.

10 Q. And which manager gave you those instructions to  
11 take them as EO reports?

12 A.

13 Q. And did you, after \_\_\_\_\_ talked to you,  
14 begin taking them as EO reports?

15 A. No. I told him he was wrong. He told me the  
16 other bureaus were doing it so we should do it too. I  
17 called the area staff and asked them to check on the other  
18 bureaus. So rather than us do the same thing, we should do  
19 what's right. And he called \_\_\_\_\_ and asked him what  
20 was going on, and \_\_\_\_\_ asked me who told him. I  
21 told him I did. He said, I'll fix his ass, and that's as  
22 far as it went. He never came back again to tell me again.  
23 I kept taking them the same way.

24 Q. Who did you say you talked to in checking on the  
25 other bureaus?

1 A. Area staff.

2 Q. Area staff. Who was that?

3 A. Bob Fecht.

4 Q. F-e-c-h-t?

5 A. I believe so.

6 Q. And Mr. Fecht's handled operation reviews, didn't  
7 he?

8 A. That's correct.

9 Q. When you talked to Mr. Fechts did he indicate to  
10 you that he had found other bureaus doing -- taking customer  
11 direct reports and making them --

12 A. Just the opposite. He said he made many reviews  
13 on those two bureaus and that he did not find that to be a  
14 problem.

15 Q. Do you know if \_\_\_\_\_ had given those  
16 directions to any other managers besides you?

17 A. The supervisor that had the job before me.

18 Q. And who was that?

19 A.

20 Q. Can you spell his last name?

21 A.

22 Q. Now, I want to be very clear.

23 received directions from \_\_\_\_\_ to take customer  
24 direct reports and take them as EO reports?

25 A. He told me he was -- when I took over the job he

1 explained what he was doing. He told me how he was  
2 instructed to do them. I don't recall who he told me  
3 instructed him to do them.

4 Q. All right.

5 A. I just made up my mind, because I knew it wasn't  
6 right.

7 Q. If you got that instruction today, would you call  
8 the hotline on that?

9 MR. BEATTY: Objection, speculative. You can  
10 respond to that, if you can.

11 THE WITNESS: No, if you object I'd prefer to  
12 have it reasked a different way or whatever.

13 BY MS. RICHARDSON:

14 Q. You need to let me know. I thought you were  
15 pausing to think.

16 A. I'm sorry.

17 Q. That's fine. It does call for speculation. If  
18 today your manager came to you and told you specifically to  
19 take these repeat reports that were being called in by the  
20 customer and open them as employee originated reports, would  
21 you yourself feel that you should call the hotline on that  
22 instruction?

23 MR. BEATTY: Objection. The question calls  
24 for speculation, first. And secondly it's not  
25 relevant what this particular witness would

1 choose to do on a speculative event. What is  
2 critical is that he knows what the hotline is and  
3 he can use it if he so likes. So I would object  
4 on those two bases.

5 THE WITNESS: I'd do the same thing. I would  
6 go ahead and try to resolve it. Make them aware  
7 of it and hope that he would want to do something  
8 different.

9 BY MS. RICHARDSON:

10 Q. Have you ever felt pressured or intimidated by  
11 upper level managers when you have gone head to head with  
12 them on instructions?

13 A. Intimidation and pressure has been there, but not  
14 to the extent that I would knuckle under and do something I  
15 shouldn't do.

16 Q. Do you know if the managers that gave you those  
17 instructions also pressured or intimidated other  
18 individuals?

19 A. I can't say that I do.

20 MR. BEATTY: I object to the form of the  
21 question. Supports facts not to evidence.

22 BY MS. RICHARDSON:

23 Q. Let's go to number twenty-one, Mr. Bryant, wet  
24 and dry rules. Can you tell me what a wet and dry rules is?

25 A. This is for the automated handling of customer

1 trouble reports where it's screened by auto screener, by the  
2 test equipment prior to being handled by a human. And we  
3 have parameters set within the rules. If a customer reports  
4 a no dial phone, then the machine is told process that  
5 trouble, or to dispatch out on it, or send to central  
6 office, or whatever.

7 Q. Does the company still use wet and dry rules?

8 A. I don't believe so.

9 Q. Do you know when they stopped using wet and dry  
10 rules?

11 A. Just recent.

12 Q. Do you know of anyone who has misused the wet and  
13 dry rules in order to avoid statusing out of service  
14 reports?

15 A. I don't think so.

16 Q. Do know of anyone who has -- let me stop and ask  
17 it this way. Is there a certain set of conditions or codes,  
18 test codes, that are considered by the company automatically  
19 to be out of service?

20 A. There was, now there is not. Now it's strictly  
21 customer prompted. I don't remember exactly.

22 Q. Do you know of any managers who deliberately  
23 changed those rules to avoid statusing out of services?

24 A. I'm almost sure that was done, because I handled  
25 the screening rules when I was here. And the intent of the

1 wet and dry rules was really to determine how critical a  
2 service is. It didn't have anything to do with out of  
3 service or as far as internal or external. So we went on  
4 the most important troubles first.

5 Q. Did you keep copies of your auto screening rules?

6 A. I did, back initially when I took over the job.  
7 Once I saw a reason to make changes for them, I would keep a  
8 copy of the new changes and write the reason for it and just  
9 handwrite notes in case I was questioned by my boss as to  
10 why I changed it.

11 Q. Do you still have all of those old copies?

12 A. Oh, no. It's about four or five weeks ago since  
13 I was doing that job. Mostly what I found was nothing that  
14 would fall in your line of questioning. It was mostly  
15 determining whether we should have gone out on the trouble.  
16 So the trouble -- the expense of doing something we  
17 shouldn't do. That's the type of trouble I handled.

18 Q. Have you ever heard of managers misusing the auto  
19 screener rules to affect the PSC index?

20 A. I can't say I have. If I did, it would be just a  
21 bureau type thing. Well, so and so is doing that.

22 Q. All right. Number twenty-four is by your name  
23 also. Special services or special circuits. What's a  
24 special service?

25 A. The special service is something that falls --

1 because of the nature of the service, how important it is. A  
2 special handling procedure would be a MAC account.

3 Q. M-A-C?

4 A. Yes. That is a type of special -- 911 is another  
5 type. Police, fire stations, anything of that nature.

6 Q. And those have special requirements in terms of  
7 clearing time?

8 A. That's correct.

9 Q. And those are much shorter?

10 A. Much.

11 Q. Is that the four hour period you spoke of  
12 earlier?

13 A. Right.

14 Q. And what's a special circuits?

15 A. It could be by the importance of the circuit or  
16 by the design of the circuit.

17 Q. Special circuits always designate special  
18 services?

19 A. I don't think all of them are.

20 Q. Do you know of any instances of improper handling  
21 of special services or special circuits?

22 A. That's the only one I can recall.

23 Q. That one report with

24 A. Anything else I might have gotten involved in  
25 would have been we should have handled it this way, training



1 and retraining type cases. Once it's handled, I don't  
2 remember because it's not like something that was wrong. If  
3 it's an honest mistake you don't remember stuff like that.  
4 You correct it and you move on.

5 Q. Did you participate in any of the operational  
6 reviews for your maintenance center, Fort Lauderdale,  
7 Margate, Pompano; did you participate in the any of the  
8 operation reviews for any of those centers?

9 A. I had like many reviews I would do myself to make  
10 sure that everything is in line or something of that nature.

11 MR. BEATTY: Listen to the question.

12 BY MS. RICHARDSON:

13 Q. What about area staff, for instance. Like  
14 Mr. Fecht or any of the other people that did operation  
15 reviews by area staff, did you participate in any of those?

16 A. No.

17 Q. Did you get feedback on any of the operation  
18 reviews that were done on any of the centers you worked in?

19 A. Same feedback was given to me, like in a group  
20 meeting. This is errors that were found, stuff of that  
21 nature.

22 Q. When you were receiving feedback in any of those  
23 operational reviews, did you form an opinion at that time  
24 that anyone was abusing the customer trouble report process?

25 MR. BEATTY: Object to the form of the

1 question, to the words abusing. It's ambiguous.

2 You can respond to that.

3 THE WITNESS: I don't think so. Generally  
4 the feedback was with a staff person giving the  
5 feedback. It's just pointing out errors and  
6 things of this nature. So, no, I didn't form  
7 any opinion.

8 BY MS. RICHARDSON:

9 Q. When the errors were pointed out, did any of them  
10 seem to be large enough to be considered wrong? For  
11 instance, you gave me the exclude type that you found  
12 yourself. Were any errors pointed out that you felt that  
13 there seems to be a problem here?

14 A. I'd have to say -- I couldn't say yes to that  
15 because again, they're just looking at numbers. Where those  
16 I pulled out and I looked at every status and that trouble  
17 report as it was handled.

18 Q. Also by name is employee originated reports  
19 generally. Do you have anything else to add to this other  
20 than what you told me about employee reports that may have  
21 been handled improperly?

22 A. Again, I'd have to say anything that I ran across  
23 I would have went back and talked to the MA and it didn't  
24 happen again. Just training and retraining type  
25 circumstances. But not as an ongoing plan of attack, so to

1 speak.

2 Q. Have you ever been disciplined for not following  
3 instructions from a manager?

4 A. No. As a craft person, not as management. But  
5 it had nothing to do with statusing reports.

6 Q. Do you know any manager who has been disciplined  
7 by the company in relation to handling the customer trouble  
8 reports?

9 A. No.

10 Q. Have you ever had occasion when you have -- you  
11 have been a craft person?

12 A. Yes.

13 Q. While you were a craft person, were you ever part  
14 of the union?

15 A. Yes.

16 Q. Did you ever file a grievance, a work-related  
17 grievance in regard to how you were being given instructions  
18 for handling customer troubles?

19 A. No.

20 Q. Did you ever participate in sales for the  
21 company?

22 MR. BEATTY: Object to the form of the  
23 question. It's ambiguous. Participate as a  
24 supervisor or what?

25 BY MS. RICHARDSON:

1 Q. In any position that you've held as an employee  
2 with Southern Bell, have you ever helped sell services or  
3 products for the company?

4 A. We've had like a sales program. Like when I was  
5 outside as a craft person, it was like, would it be better  
6 for that customer to have an extension or something like  
7 that. You might have an elderly person that has to get from  
8 this end to that end, would he be better off with two  
9 phones. We were encouraged to sell in situations like that.

10 Q. Did you ever participate in any sales promotional  
11 campaigns for the company in the late 80's, early 90's?

12 A. I didn't.

13 Q. Were you ever asked to help participate in sales  
14 programs?

15 A. I was asked to give up an employee one time.

16 Q. And did you --

17 MR. BEATTY: Listen to the question.

18 BY MS. RICHARDSON:

19 Q. Did you give up the employee --

20 A. Yeah.

21 Q. -- for sales? Which employee of yours helped  
22 sell?

23 A. One of the clerical, Pearl Smith.

24 Q. Pearl Smith. And was Ms. Smith taken  
25 specifically to do sales, or was she just selling as part of

1 her work with customers on out of service troubles or in  
2 troubles generally?

3 A. She was taken to do sales.

4 Q. Did she participate in a boiler room?

5 MR. BEATTY: If you know.

6 THE WITNESS: She was over in the operation  
7 room, which was referred to as a boiler room. I  
8 don't know if it was a boiler room.

9 BY MS. RICHARDSON:

10 Q. How long did she work on sales?

11 A. I really don't know. At least three or four  
12 months. I believe I left the center and she was still over  
13 there.

14 Q. Were you still her supervisor while she was  
15 performing sales?

16 A. No, I did none of the supervisory duties as far  
17 as verifying time sheets, attendance, or anything else.

18 Q. Who was her supervisor while she was doing sales?

19 A. Cliff Olson.

20 Q. Did you ever have occasion to talk to Ms. Smith  
21 about her sales work?

22 A. Yes. Just as to what she was doing, find out  
23 when I was going to bring her back, because I didn't really  
24 have people to spare. As to what she was doing, things of  
25 that nature.

1 Q. Do you know whether or not she was recording time  
2 spent as a maintenance administrator or as a sales rep?

3 A. That I don't know. I didn't sign her time  
4 sheets.

5 Q. Do you know of anyone who reported a sale of a  
6 service or product to a customer without contacting that  
7 customer?

8 A. I'd have to say -- I don't know of any person  
9 that I could name.

10 Q. And in your conversations with Ms. Smith, did she  
11 ever indicate to you that she was aware of employees who  
12 were falsifying sales records?

13 A. Yes.

14 Q. All right. And what did she say to you about the  
15 falsification of sales records?

16 A. She mentioned the fact that the computer,  
17 basically, was inaccurate and she arranged to send me the  
18 records that were wrong. And I had the input/output  
19 operation telephone records, and I had those changed so that  
20 they did reflect the same records that the business office  
21 did have.

22 Q. And was this dealing with wire maintenance  
23 records?

24 A. Yes. For the most part. There were other things  
25 too.

1 Q. So, it also reflected some inaccuracies in the  
2 features; special custom calling features?

3 A. Yes.

4 Q. I want to make sure. So she was working from  
5 business office record files or which files was she working  
6 from?

7 A. Repair.

8 Q. Repair records. And the repair records were not  
9 consistent with business office records?

10 A. That's correct.

11 Q. And then what you did was to take the repair  
12 records that she had and update them according to the  
13 business office?

14 A. Correct.

15 Q. Now, can you explain to me how using the repair  
16 records ended up in falsified sales records?

17 MR. BEATTY: Object to the form of the  
18 question. Assumes facts not in evidence.

19 MS. RICHARDSON: I had ask asked him  
20 questions of falsifying sales records. Let me go  
21 back.

22 THE WITNESS: I don't know.

23 MR. BEATTY: He's already answered it.

24 BY MS. RICHARDSON:

25 Q. Did Ms. Smith report any other employees to you

1 who were using inaccurate records in order to do sales?

2 A. If she mentioned a name or two or whatever I  
3 don't remember.

4 Q. Do you know if Ms. Smith received any training to  
5 do this sales work?

6 A. She didn't need it. It was just a matter of --

7 MR. BEATTY: Listen to the question. Do you  
8 know whether she received any training?

9 THE WITNESS: Okay. No, that I don't know.  
10 She could have, I don't know any.

11 BY MS. RICHARDSON:

12 Q. I think you were starting to say she didn't need  
13 any. Why do you think she didn't need any?

14 A. Well, I spent a lot of time -- I believe first  
15 level -- you have people you're supposed to spend a lot of  
16 time with getting them trained and things like that. She  
17 knew quite a bit as far as any information she might need to  
18 sell. But it's possible they could have trained her on  
19 something else, given her some guidelines.

20 Q. Do you know of any customers that had been  
21 reported as having ordered services at that time who later  
22 received rebates in the company for those sales activities?

23 A. Yes.

24 Q. You do. Do you know of any customers who  
25 reported that they had seen new services added to their



1 bills that they never ordered?

2 A. That's the same thing, yes.

3 Q. I want to make sure that I'm clear on that. Do  
4 you know of any instances other than what you've talked to  
5 me about today about any employee falsifying a customer  
6 trouble record?

7 A. I'd have to say anything that I could possibly --  
8 I had one fellow that did something once. Because of the  
9 nature, I think I skipped the counseling and went to a  
10 warning. It was something -- some way or another I went  
11 back to problem, back to the employee and we checked it. It  
12 wasn't something that was allowed to go on if it was  
13 discovered.

14 Q. Do you know of anyone who has taken a group of  
15 Test-OK reports and closed them out as out of service to  
16 affect the PSC index?

17 MR. BEATTY: Objection, it's been asked and  
18 answered.

19 MS. RICHARDSON: I don't see it, Robert. We  
20 talked about exclude reports, but I don't see it  
21 on the company list. I may be wrong. And I've  
22 been pretty much following the --

23 MR. BEATTY: I think I'm wrong. I retract.

24 BY MS. RICHARDSON:

25 Q. Let me rephrase the question and repeat it. Do

1 you know of anyone who has taken a group of Test-OK reports  
2 and closed them out as out of service in order to affect the  
3 PSC index?

4 A. No. The only thing I can say on that would be  
5 like if I had somebody working for me, we were going through  
6 the Test-OKs, subsequently we would make a contact with the  
7 customer and find out we didn't need to dispatch. We would  
8 ask them what time was the phone on and was it in fact out  
9 of service, or something like that. And we would mark them.

10 Q. Okay.

11 A. But not for a goal, you know, affecting our  
12 reports.

13 Q. Do you know whether or not the no access code  
14 stops the repair clock, that 24 hour repair clock on an out  
15 of service report?

16 A. My understanding was -- and, you know, it may  
17 have changed two or three times plus. Things have changed  
18 over the years. The last thing I recall is if we dispatched  
19 on it prior to the appointment, it wasn't scored against  
20 us. And so it's not so much the no access, but it was the  
21 dispatch time that was more of a trigger.

22 Q. Do you know of anyone who has no accessed a group  
23 of out of service reports without dispatch?

24 A. No.

25 Q. Do you know of anyone who no accessed an out of

1 service report when they actually did have access?

2 A. Not individual cases. It may be a case where the  
3 customer says, I was there all day, I never left. If he  
4 would have knocked, I would have heard. The subsequent  
5 repairman guess out there, you think maybe the first guy  
6 didn't want to do the job. That may or may not have been  
7 the case.

8 Q. Do you know of anyone who has taken out of  
9 service reports and deliberately no accessed them in order  
10 to affect the PSC index?

11 A. (Witness nodding head.) I'm sorry, I keep  
12 shaking my head. I should be saying no.

13 MS. RICHARDSON: Okay. Mr. Bryant, I want to  
14 thank you for being here. There may be one or  
15 two questions from someone at the end of the  
16 table. And unless somebody jogs my memory, I may  
17 not ask you anything else. I want to thank you  
18 and I appreciate you coming.

19 THE WITNESS: Thank you.

20 MR. GREER: I have a couple.

21 CROSS EXAMINATION

22 BY MR. GREER:

23 Q. You were talking about exclude codes or excluding  
24 trouble reports, excuse me. How exactly do you go about  
25 excluding a trouble report?

1           A.    On the final line of status there is a box. You  
2 throw and "X" in there. It's not actually doing anything  
3 more than that.

4           Q.    And when you were doing your analysis for the  
5 trouble reports and you noticed sixteen reports that were  
6 excluded, how did you do that analysis; what did you look at  
7 to determine that it had been excluded and opened as another  
8 report?

9           A.    Well, I was just looking at all of the excludes.  
10 That particular batch had my number on it, I knew I didn't  
11 do it.

12          Q.    Does it show an exclude category on it?

13          A.    Yes.

14          Q.    Has that always been the case?

15          A.    As far as I know. Usually the final line of  
16 status shows it.

17          Q.    When Ms. Smith went to do sales, can you give me  
18 a time frame of when that was; '90, '91?

19          A.    It wasn't -- I believe '87 or '88. I'm not  
20 sure. It was probably like August or September. Something  
21 like that. I'm not sure of the date.

22                   MR. GREER: That's all I have.

23                   MR. BEATTY: Okay, that's it.

24                   (Whereupon the deposition was concluded at

25                   4:29 p.m.)

CERTIFICATE

STATE OF FLORIDA )  
COUNTY OF PALM BEACH )

I, Kimberly C. Ayers, Court Reporter and Notary Public, State of Florida at Large, do hereby certify that I reported the deposition of JAMES BRYANT stenographically, and that the foregoing transcript is of a true and correct transcript of my shorthand notes.

I further certify that the deposition was taken at the time, place shown hereon, and that all counsel, persons as hereinabove shown were present.

I further certify that I am not an attorney, counsel, relative or employed by either party or attorney.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

WITNESS MY HAND AND SEAL THIS 29<sup>th</sup> day of June, 1993, at West Palm Beach, County of Palm Beach, State of Florida.

Kimberly C. Ayers  
KIMBERLY C. AYERS, Court Reporter