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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL
FILED: June 16, 1993

920260-TL

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.

DEPOSITION OF: EDUARDO ANDRADE

DATE: June 30, 1993

TIME: Commenced at: 8:35 a.m.
Concluded at: 9:15 a.m.

PLACE: Southern Bell Telephone and Telegraph Co.
666 Northwest 79th Avenue, Room 674
Miami, Florida 33126

REPORTED BY: AMAR KREDI
Registered Professional Reporter,
Notary Public, State of Florida At Large
Suite 1014, Ingraham Building
25 Southeast 2nd Avenue
Miami, Florida 33131

TAKEN BY: The Citizens of Florida, by and through
Janis Sue Richardson,
Associate Public Counsel

PURSUANT TO: Florida Rule of Civil Procedure
1.310 (b) (6)

DOCUMENT NUMBER - DATE

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(BY: ROBERT G. BEATTY, ESQ.)
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(305) 530-5561

1 THEREUPON:

2 EDUARDO ANDRADE,

3 having been first duly sworn, was

4 examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. RICHARDSON:

7 Q. Would you please state your name and spell it for the
8 court reporter?

9 A. My name is Eduardo Andrade, E-D-U-A-R-D-O,
10 A-N-D-R-A-D-E.

11 Q. And your address, please?

12 A. 13305 Northwest 45th Avenue, Miami, Florida.

13 Q. The zip code?

14 A. I don't know it.

15 Q. Is that a business address?

16 A. Yeah, this is my office.

17 Q. Okay. And your phone number?

18 A. 681-7451.

19 Q. Are you represented an attorney here today?

20 A. No, I'm not, at least not personally.

21 MR. BEATTY: No.

22 BY MS. RICHARDSON:

23 Q. Have you been advised that you would not be
24 disciplined based upon whatever you told us here today?

25 A. Yes.

1 Q. Have you been advised of the possible criminal
2 penalties that could apply if you perjure your testimony here
3 today?

4 A. Yes.

5 Q. Have you given a statement to the company in the past?

6 A. Yes.

7 Q. Do you remember when that was?

8 A. Two years ago.

9 Q. Do you remember who was in the room with you when you
10 made your statement?

11 A. No.

12 Q. Did you give just one statement or two?

13 A. I think -- as far as the different times?

14 Q. Yes.

15 A. That I remember, once.

16 Q. Just one time.

17 Okay. Do you know if there was an attorney in the
18 room when you gave your statement?

19 A. I believe so, there was an attorney.

20 Q. Was there someone from Security in the room with you?

21 A. I believe so.

22 Q. Okay. Was there anyone from the Union present?

23 A. No.

24 Q. Are you a member of the Union?

25 A. Yes.

- 1 Q. Okay. Who's your shop steward?
- 2 A. There's many of them.
- 3 Q. The one that you would go to if you needed to file a
4 grievance or ask a question.
- 5 A. I go to Bob Krukles.
- 6 Q. Can you spell his last name?
- 7 A. K-R-U-K-L-E-S.
- 8 Q. Okay. What's your position with the company?
- 9 A. Service technician.
- 10 Q. All right. And how long have you been an ST?
- 11 A. 14 years.
- 12 Q. Has all of that time been here in Miami?
- 13 A. Yes, ma'am.
- 14 Q. Which IMC do you work out of, which center?
- 15 A. North Dade.
- 16 Q. North Dade.
- 17 Have you spent all 14 years in North Dade?
- 18 A. Yes.
- 19 Q. Who's your first level manager right now?
- 20 A. Right now we have a temporary by the name of Auggie
21 Robaina, R-O-B-A-I-N-A.
- 22 Q. And that's a temporary, you said?
- 23 A. He's a reliever, relieving foreman.
- 24 Q. And who is your permanent foreman?
- 25 A. Mike Short, Michael Short.

1 Q. Do you remember who your first level foreman was
2 before Mr. Short?

3 A. Before Mr. Short, we had Richard Munz, M-U-N-Z.

4 Q. And before Mr. Munz, do you remember who --

5 A. Paul Brigham.

6 Q. Can you recall any other first level foreman that you
7 had?

8 A. Mike Wallace, Darrell White, the late Dave Shekles.
9 That's about it.

10 Q. Okay. Who is your second level foreman right now?

11 A. Right now it's Charlie Finney.

12 Q. And how long has Mr. Finney been your second level
13 foreman?

14 A. About five years, six years.

15 Q. And who was it before Mr. Finney?

16 A. Charlie Little.

17 Q. And have you had any other second level foreman while
18 you were in North Dade?

19 A. Yeah, we had -- I can't think of their names. An
20 Irishman, Dwight, Dwight something.

21 Q. Okay.

22 A. I can't remember.

23 Q. Who's your operations manager right now?

24 A. Right now? That would be the third level?

25 Q. District manager may be another way of saying it.

1 A. Well, the only other two people that I know are Ralph
2 De La Vega and Linda Eisenhower.

3 Q. Mr. De La Vega.

4 Do you know who held the position before
5 Mr. De La Vega?

6 A. I believe it was -- I don't remember his name. A
7 white-haired man.

8 Q. You can see his face but you can't recall his name.

9 A. Yeah.

10 Q. Okay. What do you do as a service technician?

11 A. Repair phones and -- I mean, lines and install
12 service.

13 Q. All right. When you repair, do you work with
14 residents and business?

15 A. Both.

16 Q. Do you work with large business customers at all?

17 A. Yes.

18 Q. Do you work on PBXs?

19 A. No.

20 Q. Did you receive training for that position?

21 A. Yes.

22 Q. Is your training ongoing as you go through the job?

23 A. It's an ongoing training, right.

24 Q. All right. Do you know if the company requires an out
25 of service trouble to be cleared within 24 hours?

1 A. That's usually the commitment, a 24-hour commitment,
2 right.

3 Q. Okay. Do you know if the Public Service Commission
4 requires the company to clear at least 95 percent of its out of
5 service reports within 24 hours?

6 A. No.

7 Q. Do you know if a customer gets a rebate if they're out
8 of service more than 24 hours?

9 A. I've heard they do. I've never had it happen
10 personally.

11 Q. I'm going to show you a document, and I'll read it
12 into the record first.

13 This is called Southern Bell's Response to Preliminary
14 Order Number PSC-93-0263-PCO-TL entered on February 19th, 1993,
15 and this was filed by the company in the rate case that they
16 have before the Commission on April 1st, 1993, and your name
17 appears at number nine on page four.

18 Have you seen this document?

19 A. Yes.

20 Q. Do you need any time to read any of the information
21 before I ask you questions?

22 A. No.

23 Q. Okay. I believe by your name appears the number one.

24 A. Right.

25 Q. Okay. And let's just check them. Two and 11 and 12

1 and 14, 15, 25; is that correct?

2 A. Right.

3 Q. All right. Number one indicates that you could have
4 some information about backing up clearing or closing times.

5 Would you explain to me what a clearing time is on a
6 trouble report?

7 A. Clearing time is when you put the customer back in
8 service.

9 Q. Okay. And what's a closing time?

10 A. When you complete the job itself as far as the work
11 that needed to be done.

12 Q. All right. Why wouldn't they be the same?

13 A. Because if there's a broken wire and I replace that
14 wire, they have service, but now I have to, you know, clean up
15 the rest of the area, put a new protector or change out
16 different things and it will take longer than when I came out
17 and gave them service; or if I go in there and the trouble is
18 inside, I isolate the trouble, they'll already have service;
19 now I have to go shoot that trouble.

20 Q. Okay. About how long does it take you to do this
21 after service restoral work?

22 A. It varies.

23 Q. What's an average amount of time that you would
24 normally spend?

25 MR. BEATTY: If you can establish an average.

1 A. Half hour, 45 minutes.

2 BY MS. RICHARDSON:

3 Q. Okay. When you've worked out of service reports, have
4 you had any of those go out longer than 24 hours?

5 A. I've had some, yes.

6 Q. All right. And when you've had them go out over 24
7 hours, what happens in terms of follow-up with you personally?
8 Is there any follow-up, you know, why you didn't get it done in
9 24 hours?

10 A. Sometimes you get a call what happened, you missed a
11 commitment. That's about it.

12 Q. Okay. Are you asked to explain?

13 A. Yeah.

14 Q. Okay. Are you asked or queried about what codes you
15 used or what times you placed on a report?

16 A. Those particular reports?

17 Q. Yes.

18 A. No.

19 Q. Okay. Have you ever heard of backing up the time on a
20 report?

21 A. Backing up the time?

22 Q. Yes, to meet the commitment.

23 A. Without service being restored?

24 Q. Yes.

25 A. No.

1 Q. Has anyone ever asked you to back up the clearing time
2 on an out of service report to make sure that it's reflected as
3 being cleared within 24 hours?

4 A. No.

5 Q. Do you know if any of the MAs to whom you've -- Let me
6 ask you this first: At some point when you were working in
7 North Dade, did you have to call in to an MA to close your
8 reports?

9 A. We used to, yes.

10 Q. Okay. At that point in time when you were calling MAs
11 to close reports, do you know if any of the MAs took the time
12 you gave them and backed it up by 15 or 20 minutes because they
13 assumed that you were doing the routine work?

14 A. No. They would ask what time did you clear and what
15 time did you close it.

16 Q. Okay. Number two is by your name and number two
17 indicates the use of cause codes.

18 What is a cause code?

19 A. The reason for the out of service.

20 Q. Can you give me an example of a cause code?

21 A. Moisture, lightning, hurricane.

22 Q. Are there cause codes when the problem has been caused
23 by another Bell workman?

24 A. Yes.

25 Q. Are there cause codes when the problem has been caused

1 by the customer themselves?

2 A. Yes.

3 Q. Do you know if any of those cause codes would keep an
4 out of service over 24 from counting against the company as a
5 miss?

6 A. No.

7 Q. Let me give you an example.

8 Were you here during Hurricane Andrew?

9 A. Right.

10 Q. Did you have to work with the company to help put
11 people back in service?

12 A. Right.

13 Q. Did you use the hurricane cause code during that time?

14 A. Yes, ma'am.

15 Q. All right. Was the company able to restore everyone's
16 service within 24 hours after Hurricane Andrew?

17 A. No, not everyone.

18 Q. Do you know if all of those out of services counted
19 against the company for not getting that repair done because of
20 the damage being caused by the hurricane?

21 MR. BEATTY: I object to the form of the question. He
22 already answered the question. He's indicated he has no
23 idea.

24 You can answer.

25 A. No, I have no idea.

1 BY MS. RICHARDSON:

2 Q. I'd like to show you another document. Then we'll
3 come back to this one.

4 This is Citizens Third Set of Interrogatories. An
5 interrogatory is a question that I've put down in writing and
6 I've mailed to the company and they've mailed me their written
7 answer.

8 And I asked the company to tell me the names of
9 employees who knew about the use of improper exclusion codes on
10 repair reports.

11
12
13
14 At this point we'll go off the record and I'll give
15 you a chance to read this so you can see what it says, and
16 you'll have a chance to talk to Mr. Beatty if you want to about
17 the document, and when you're ready, we'll go back on the
18 record and I'll ask you a few questions about it.

19 (Discussion off the record, with the agreement of the
20 witness and all parties present)

21 MR. BEATTY: Okay.

22 BY MS. RICHARDSON:

23 Q.

24
25 Can you tell me what an exclude code is?

1 A. I have no idea. Exclusion code. The only codes I
2 know are the disposition codes and the cause codes.

3 Q. Okay. Have you ever been asked to use any of the
4 weather codes on conditions when they did not apply?

5 A. No.

6 Q. Were you ever asked, for instance, to take and use a
7 tornado code when there had been a tornado and apply it to all
8 the troubles that you dealt with even though some of those
9 troubles may not have been caused by that particular tornado?

10 A. No.

11 Q. Okay. By your name -- I'm going to ask you first
12 about disposition codes.

13 Can you tell me what a disposition code is?

14 A. A disposition code is what you fix, where the problem
15 was.

16 Q. Can you give me an example of a disposition code?

17 A. A disposition code 0384 would be the aerial service
18 wire that feeds the premise, 1210 would be inside wiring.

19 Q. Do you know if there are any disposition codes that
20 would keep an out of service over 24 from counting against the
21 company as a miss?

22 A. No.

23 Q. I think you mentioned inside wire.

24 A. Right.

25 Q. Does the company repair all the inside wire problems?

1 MR. BEATTY: If you know what the company does on a
2 collective, then you can respond to that.

3 A. If the customer has the maintenance plan, we repair
4 it. If it's not within the maintenance plan, then either they
5 get billed for it or we don't repair and they take care of it.

6 BY MS. RICHARDSON:

7 Q. Okay. On the ones where the customer takes care of it
8 instead of the company, if that problem stayed out of service
9 more than 24 hours, would that count as a miss against the
10 company on that out of service over 24?

11 A. Can you repeat the question again?

12 Q. I'll be glad to.

13 Any time you don't understand or need me to clarify,
14 please just ask me to do that. And if at any time you feel you
15 need to talk to Mr. Beatty off the record, just let me know.
16 We can go off the record and you can do that.

17 You mentioned that there were times when an inside
18 wire problem, the customer would say that they wanted to fix
19 the phone instead of being billed for it.

20 A. Right.

21 Q. Under those conditions when the customer is going to
22 do their own repairs, do you know if that out of service when
23 it went out over 24 counted as a miss against the company for
24 not having completed it within 24 hours?

25 MR. BEATTY: Objection to the form of the question.

1 It's been answered. This individual has indicated that he
2 does not know whether or not those codes exclude anything.

3 BY MS. RICHARDSON:

4 Q. You can still answer my question.

5 A. When you close out the trouble, whether the customer
6 is going to do it or not is irrelevant. I close out the
7 trouble and that's the time that I show. You know, if I give
8 them service, I'll give the customer the option whether to
9 leave the trouble off, which usually that's what they ask you
10 to do, and it puts them back in service. Now, the one wire,
11 let's say, the bedroom that's messed up, that is going to be
12 out of service until they fix it but the rest of the service up
13 to the network interface is working.

14 Q. If they only had one phone, would they be back in
15 service?

16 A. At the interface, yes.

17 Q. Could they make calls if the problem was in their own
18 set?

19 A. At the interface, yes. Well, if they get another set.
20 If their set was defective, then they have no way of using that
21 set. If they were able to get another set, then they could
22 just go ahead and plug right in.

23 Q. So technically even though the company has fulfilled
24 its obligation to get them service to the protector, they may
25 not have service?

1 A. Right.

2 MR. BEATTY: I object to the form of the question.

3 The question is ambiguous. He's indicated they have
4 service.

5 A. They will have service at the interface. If it's an
6 apartment, there will be an interface inside the apartment. If
7 it's a house, a single family unit, then there's the interface
8 outside where the protector goes.

9 BY MS. RICHARDSON:

10 Q. If it takes you more than 24 hours to find that the
11 problem is inside, do you notify the customer that they've got
12 a problem inside the house or inside their own line?

13 A. You notify the custom when you first get there and as
14 your work progresses. You always keep the customer informed.

15 Q. All right. I'd like you to look at number 11.

16 Number 11 indicates that you may have some information
17 about improper preparation of trouble reports.

18 What information do you have about that?

19 MR. BEATTY: Objection to the form of the question.

20 It's ambiguous.

21 Do you have a specific question?

22 A. What do you mean by the question? I don't understand
23 it.

24 BY MS. RICHARDSON:

25 Q. Okay. Let me come back to that one then. We'll do

1 some other things first.

2 Do you ever have occasion to status a report yourself
3 as out of service or affecting service?

4 A. No.

5 Q. On your CAT terminal -- do you have a CAT terminal?

6 A. Right.

7 Q. Are you able to status a report as out of service when
8 you close it out?

9 A. Now that you mention it, I don't recall.

10 Q. Okay. Before you had CAT terminals and you were
11 calling the maintenance administrator to close out, were you
12 ever able to indicate to the service administrator on a close
13 out the particular status of the trouble that you were working
14 on?

15 A. As far as if they were out of service or not, yeah.

16 Q. All right. Did you ever have occasion to get an
17 affecting service report like a noise report and get out to the
18 premise and by the time you got there to work the problem found
19 that there was no dial tone and they were completely out of
20 service?

21 A. Right.

22 Q. Okay. At that point then when you called and reported
23 that problem cleared, did you indicate to the MA that they
24 ought to change the status to out of service?

25 A. That they were out of service, right.

1 Q. Today with the CAT terminal, how do you get that
2 particular type of problem restated to out of service?

3 A. I'm sure there's a way, as the CAT, the computer
4 would, you know, would walk you through the steps, I'm sure
5 there's a way in there to indicate whether they were out of
6 service or not. Right at this moment I don't remember which
7 page or which step would be, you know, that one in particular.

8 Q. Okay. Have you had that kind of problem come up since
9 you've had the CAT terminal?

10 A. Yeah.

11 Q. Okay. But you don't recall how you did it then?

12 MR. BEATTY: Objection to the form of the question.

13 The gentleman has already indicated he didn't know.

14 A. I'm sure, like I say, as you close out the trouble --

15 MR. BEATTY: Is there a question pending?

16 BY MS. RICHARDSON:

17 Q. Okay. All right. At any point that you've been
18 working in 14 years in North Dade, was there ever a time when
19 all of your reports would come through as service affecting
20 reports and you were to indicate whether or not they were out
21 of service on close out?

22 A. I don't understand the question.

23 Q. All right. When reports come to you, when you get a
24 trouble report --

25 A. That was back then.

1 Q. Back then did you call in to get your reports?

2 A. We used to have to call in, right.

3 Q. And were you told whether or not it was an out of
4 service or an affecting service when you called in?

5 A. Oh, yeah.

6 Q. At any point during that period of time, was there any
7 particular day when you were told that all the reports that
8 you were going to get were just affecting service, they weren't
9 going to send any out of services to you?

10 A. No.

11 Q. Do you know if any manager who has given an
12 instruction that there would not be any out of service reports
13 on any particular day?

14 A. No.

15 Q. Do you know of any manager who has given a specific
16 instruction that out of service reports would not be statused
17 until close out?

18 A. No.

19 Q. Do you know of anyone who has statused affecting
20 service reports as out of service?

21 A. No.

22 Q. Do you know of anyone who has taken out of service
23 reports and not statused them as out of service?

24 A. No.

25 Q. Do you know what the no access code is?

1 A. The code for it itself?

2 Q. Yes.

3 A. The number code for it?

4 Q. No, the NAS code, the no access subscriber code.

5 Generally can you briefly tell me what it means?

6 A. Means when there's no access to the INI or the ONI.

7 Q. And is that INI, ONI, is that a network --

8 A. The network interface, inside network interface or
9 outside network interface.

10 Q. Okay. That clarifies it for me.

11 A. I'm sorry.

12 Q. That's all right.

13 Do you know if that no access would stop that 24-hour
14 repair clock on an out of service report?

15 A. No.

16 Q. Do you know of anyone who has no access out of service
17 reports that were about to go over 24 hours just to no access
18 them?

19 A. No.

20 Q. Do you know of anyone who has no accessed a report
21 before it was dispatched?

22 A. No.

23 Q. Do you know of anyone who has no accessed a report
24 when they actually did have access to the premises?

25 A. No.

1 Q. Have you ever had occasion to exclude a report?

2 A. Can you explain that?

3 Q. All right. When you look at your CAT terminal and
4 you're working through the final status stages, is there a
5 place in there that has an "X" on it with a blank where you can
6 either load an "X" or not on that report?

7 A. No.

8 Q. Okay. Have you ever gone out on a trouble and found
9 out that the problem was actually a TV cable and not a phone
10 company wire at all?

11 A. Right.

12 Q. Okay. Do you know if that report has been excluded
13 because it wasn't really a phone problem?

14 A. No, I don't.

15 Q. Can you tell me what an employee report is?

16 A. An employee report?

17 Q. Yes.

18 A. When we call in a trouble and have them write it up
19 and issue it to us.

20 Let's say we're at a main line at the house and also
21 the additional line is down, they only reported one of the
22 numbers; so you automatically call in and have the other number
23 preassigned to you so you can work on it.

24 Q. Okay. And clear everything up at one time?

25 A. Right.

1 Q. Have you ever been out on a job, working a job where
2 another customer from across the street says, come over, comes
3 over to you and says, my phone is dead and I can't call in to
4 tell the company I need a repairman, would you please do it for
5 me? Has that ever happened?

6 A. Yeah.

7 Q. And when you call that report -- or have you called
8 those type of reports in?

9 A. Sure.

10 Q. Do you know if those are employee reports?

11 A. I don't think so, no.

12 Q. Are those customer direct reports?

13 A. Right, because I call 611.

14 Q. Okay. Do you know of anyone who has phoned those
15 reports in as employee reports?

16 A. No.

17 Q. Have any managers ever asked you to give customers the
18 IMC number instead of the centralized repair number to phone in
19 repeat problems that they may have on their property?

20 A. No.

21 Q. Do you know of anyone who has taken an out of service
22 report that's about to go out of 24 hours and closed that
23 report and then reopened it as an employee report to actually
24 clear the problems and close it?

25 A. No.

1 Q. Do you know of anybody whose used someone else's
2 employee code?

3 A. Yes.

4 Q. Would you tell me about that?

5 A. A long time ago they questioned me about a trouble
6 that supposedly I had closed out, and I had never been on that
7 trouble. So I told my supervisor about it and they were
8 supposed to have looked into it. Whether they got back to me,
9 I don't recall, but, you know, it was nothing major, but it was
10 closed out with my code and I had never been there.

11 Q. Were you at work that day?

12 A. Oh, yeah.

13 Q. Okay. And how could you tell that you weren't there?

14 A. Because I know the places that I visit.

15 Q. Do you keep some kind of record of all the jobs that
16 you do?

17 A. No.

18 Q. When you report your time, do you have a time
19 reporting sheet or schedule that you keep track of of your
20 time?

21 A. (Witness nods).

22 Q. That's a yes?

23 A. Yes. I'm sorry.

24 Q. And when you keep track of your time, do you also
25 report the phone numbers that you were working on?

1 A. Right. Yes.

2 Q. All right. Did you or anyone else go back and check
3 your time sheet and your phone numbers against the report that
4 your code appeared on that day?

5 A. Yes.

6 Q. Okay. And was that how you verified that you had not
7 worked the problem?

8 A. Yes.

9 Q. Do you know who actually used your code number?

10 A. No.

11 Q. Is that the only report that your code number appeared
12 on?

13 A. Yes.

14 Q. Do you know if it was an out of service report?

15 A. No.

16 Q. You don't know or it wasn't?

17 A. I don't remember that far back, no.

18 Q. Do you know if that report took more than 24 hours to
19 clear?

20 A. No, I don't.

21 Q. Who was your supervisor at that time?

22 A. I don't recall. That was quite a few years back.

23 Q. Do you remember who brought this report to your
24 attention?

25 A. The supervisor.

1 Q. But you don't remember his name now?

2 A. No, I don't. I remember the incident but I don't
3 remember the person that was involved, no.

4 Q. Can you give me an approximate year that this
5 occurred?

6 A. Seven, eight years back.

7 Q. The late-eighties sometime? Would that be about
8 right?

9 MR. BEATTY: He said seven or eight years back.

10 A. More like the mid-eighties or early-eighties.

11 Q. Mid-eighties?

12 A. Mid-eighties, somewhere around there.

13 Q. Do you know of any way of eliminating a trouble
14 report, just getting rid of it?

15 A. No. I wish I did. No.

16 Q. Okay. Number 25 is by your name. Number 25 indicates
17 service orders.

18 Do you work on installation, also?

19 A. Yes, I do.

20 Q. Have you always worked installation?

21 A. It's both. Before we'd do only installation back when
22 you used to have to call in and stuff, and then they've
23 combined everything, so now we do everything, both installation
24 and repair.

25 Q. Do you know of any instances where individuals who

1 were supposed to have their service installed hadn't actually
2 gotten it and then called in a trouble report on it?

3 A. Can you explain that again?

4 Q. Yes. Were there ever any times when you were sent to
5 install service where the installation due date was past?

6 A. On a trouble visit?

7 Q. Yes.

8 A. Right. Yes.

9 Q. Do you know if an actual trouble report was created
10 since the service hadn't been installed at that point?

11 A. I don't recall.

12 What was the question again?

13 Q. Okay. Do you know if a trouble report, an out of
14 service trouble report had been created when the service hadn't
15 been installed even though it was past the due date of the
16 service?

17 A. I was sent out on the trouble.

18 MR. BEATTY: No, no. She's just asking hypothetically
19 do you know of one that has occurred?

20 A. No, I don't.

21 BY MS. RICHARDSON:

22 Q. Do you know of any improper activities associated with
23 service order installation?

24 A. No.

25 Q. Number 11 indicates improper preparation of trouble

1 reports. We've covered a number of areas.

2 Can you add any information to what you may have
3 already said about any knowledge you have about the improper
4 preparation of trouble reports?

5 A. What do you mean by "preparation"?

6 Q. Okay. Let me ask you more specifically.

7 Do you know of anyone who has improperly stated a
8 trouble report?

9 A. Oh, no.

10 Q. Do you know of anyone who has improperly coded a
11 trouble report?

12 A. No.

13 Q. Do you know of anyone who has put an improper time on
14 a trouble report?

15 A. No.

16 Q. Do you know of anyone who has created false trouble
17 reports?

18 A. No.

19 Q. Do you know what the AIRO, A-I-R-O, system is?

20 A. Yes.

21 Q. Can you briefly tell me what that system is?

22 A. From what I understand, that's where the customers
23 call in on a recorded type trouble reporting, and that's what
24 they call that, AIRO.

25 Q. Do you know of any employee who has reported trouble

1 reports through AIRO and then had them dispatched out to
2 themselves to create work?

3 A. No.

4 Q. Have you ever been disciplined for your handling of
5 trouble records or customer troubles?

6 A. No.

7 Q. Have you ever filed a grievance?

8 A. No.

9 Q. Do you know of anyone who has filed a grievance
10 against managers for doing craft work?

11 A. No.

12 Q. Do you know of any managers who have processed trouble
13 reports themselves?

14 A. No.

15 Q. Have you ever received an instruction from a manager
16 that you felt was improper in terms of handling a customer
17 trouble report?

18 A. No.

19 Q. Have you ever helped or been asked to help sell
20 products or services for the company?

21 A. Yes.

22 Q. And at what point in time were you asked to do this?
23 Do you remember when you were asked?

24 A. Back in the early-eighties. It's always been an
25 ongoing thing. You know, the customer calling features, touch

1 tone, all that.

2 Q. Are you pretty good at it?

3 A. No.

4 Q. Have you ever been eligible for any prizes or awards
5 based on the sales you've done?

6 A. Yes.

7 Q. Have you ever won anything?

8 A. Yes.

9 Q. And what did you get?

10 A. A jacket, a cup, a mug. Nothing major.

11 Q. When you were helping with sales, did you receive any
12 special training for sales that you did?

13 A. No.

14 Q. Did anyone ask you to keep track of the amount of time
15 that you spent talking to a customer about sales products as
16 opposed to the amount of time that you were helping with the
17 repair?

18 A. No.

19 Q. When you work an inside wire problem, do you have to
20 use different work codes than when you're working outside?

21 A. Yes.

22 Q. Did you use any particular work codes for helping with
23 the sales program?

24 A. No.

25 Q. Do you know of anyone who has recorded a sale, a

1 product or a service to a customer that the customer did not
2 order?

3 A. No.

4 Q. Have you, yourself ever recorded a sale when the
5 customer didn't order it?

6 A. No.

7 Q. Have you ever been asked to spend your entire time on
8 a particular day or a couple of days in a separate room doing
9 nothing but sales?

10 A. No.

11 Q. Do you down anyone who has?

12 A. No.

13 MS. RICHARDSON: Mr. Andrade, I believe that's all the
14 questions I have but I don't know if there's --

15 MR. PIERSON: No questions.

16 MS. RICHARDSON: No questions.

17 MR. BEATTY: That's it.

18 MS. RICHARDSON: I want to thank you for being here
19 today, and I'll let you get back to putting people back in
20 service.

21 THE WITNESS: Thank you.

22 (Thereupon the deposition was concluded at 9:15 a.m.)
23
24
25

1
2 STATE OF FLORIDA)
3 : ss. CERTIFICATE OF REPORTER
4 COUNTY OF DADE)

5 I, AMAR KREDI, Registered Professional
6 Reporter, Certified Shorthand Reporter and Notary
7 Public in and for the State of Florida at Large,

8 DO HEREBY CERTIFY that the deposition of
9 EDUARDO ANDRADE, a witness called by the
10 Citizens of the State of Florida in the above-
11 captioned matter, Docket No. 910163-TL, was heard
12 at the time and place herein stated; that the witness
13 was by me first sworn to tell the truth; it is further

14 CERTIFIED I reported in shorthand the said
15 deposition; that the same has been transcribed under
16 my direct supervision, and that this transcript,
17 consisting of 32 pages, constitutes a true and
18 accurate transcription of my notes of said
19 deposition; it is further

20 CERTIFIED that I am neither of counsel nor
21 related to the parties in said cause and have no
22 interest, financial or otherwise, in the outcome of
23 this docket.

24 IN WITNESS WHEREOF, I have herunto set my
25 hand at Miami, Dade County, Florida, this 22nd day
of July, 1993.



AMAR KREDI

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Certified Shorthand Reporter and
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My Notary Commission No. CC194782
Expires: May 16, 1996

