

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL ~~920260-TL~~  
FILED: June 16, 1993

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: DELHIA JANE KOSKI

DATE: June 30, 1993

TIME: Commenced at: 3:20 p.m.  
Concluded at: 4:20 p.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

08809 AUG 16 88

## APPEARANCES:

OFFICE OF PUBLIC COUNSEL  
(BY: JANIS SUE RICHARDSON, ESQ.)  
Associate Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399-1400  
(904) 488-9330

FLORIDA PUBLIC SERVICE COMMISSION  
Division of Legal Services  
(BY: ROBERT J. PIERSON, ESQ.)  
Bureau of Regulatory Review  
(BY: CARL S. VINSON, JR.)  
101 East Gaines Street  
Tallahassee, Florida 32399-0863  
(904) 487-2740

FLORIDA PUBLIC SERVICE COMMISSION  
Division of Communications  
(BY: STAN L. GREER, Engineer)  
101 East Gaines Street, Room G-28  
Tallahassee, Florida 32399-0866  
(904) 488-1280

THE FLORIDA LEGISLATURE  
Office of the Public Counsel  
(BY: WALTER W. BAER,  
Regulatory Analyst)  
111 West Madison Street  
Tallahassee, Florida 32399-1400  
(904) 488-9330

SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY  
(BY: ROBERT G. BEATTY, ESQ.)  
Suite 1910, Museum Tower Building  
150 West Flagler Street  
Miami, Florida 33130  
(305) 530-5561

BAKER & MOSCOWITZ  
(BY: JEANNE BAKER, ESQ.)  
One Southeast Third Avenue  
Suite 1230  
Miami, Florida 33131  
Attorney for Delhia Jane Koski  
(305) 329-6700

**I-N-D-E-X**

**WITNESS**

**DIRECT CROSS REDIRECT RECROSS**

**Delhia Jane Koski**

**(By Ms. Richardson)**

**4**

**--**

**--**

**--**

**EXHIBITS**

**(None)**

1 THEREUPON:

2 DELHIA JANE KOSKI,

3 having been first duly sworn, was

4 examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. RICHARDSON:

7 Q. Ms. Koski, would you please state your name and spell  
8 it for the court reporter?

9 A. My name is Delhia, D-E-L-H-I-A, Jane Coleman Koski.

10 Q. And would you spell your last name for the court  
11 reporter?

12 A. K-O-S-K-I.

13 Q. Thank you.

14 And your address, please?

15 A. 8610 Southwest 107th Avenue.

16 Q. Is that Miami?

17 A. Yes.

18 Q. And a zip code?

19 A. I don't know it.

20 Q. Is that a business address?

21 A. Yes.

22 Q. Your phone number, please?

23 A. 598-4205.

24 Q. And are you represented here today by an attorney?

25 A. Yes.

1 MS. RICHARDSON: I'll ask her to put her appearance on  
2 the record.

3 MS. BAKER: Jeanne Baker of Baker and Moscovitz for  
4 Mrs. Koski.

5 BY MS. RICHARDSON:

6 Q. Ms. Koski, have you discussed this deposition here  
7 today with anyone other than your attorney or the attorneys for  
8 Southern Bell?

9 A. No.

10 Q. Has anyone advised you that you would not be  
11 disciplined based upon whatever you told us here today?

12 A. Yes.

13 Q. Okay. Has anyone advised you about the possible  
14 criminal penalties that could apply if you perjure your  
15 testimony here today?

16 A. Yes.

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

18 A. Yes.

19 Q. Do you remember when that was?

20 A. Approximately two years ago.

21 Q. Okay. Do you know who was present in the room with  
22 you when you made that statement?

23 A. Yes, the company attorney and Mr. Hampton Booker.

24 Q. Okay. You pointed at Mr. Beatty.

25 You mean Mr. Beatty himself was present?

1 A. Yes.

2 Q. Was anyone from the Union present at that statement?

3 A. No.

4 Q. Okay. Are you a member of the Union?

5 A. Yes.

6 Q. Who's your shop steward, your Union person?

7 A. Well, we're sort of in between now. Laurie Johnson  
8 was but she's resigned.

9 Q. All right. Can you tell me what your present position  
10 is with the company?

11 A. I'm a maintenance administrator.

12 Q. And how long have you held that position?

13 A. Approximately ten years.

14 Q. Has all of that time been here in Miami?

15 A. Yes.

16 Q. In which center have you worked?

17 A. As a maintenance administrator, only at the one on  
18 Kendall Drive that I'm presently in.

19 Q. All right. And is that the North Dade Center, South  
20 Dade? Does it have a name like that? Miami Metro, something  
21 that it's known by?

22 A. South Dade.

23 Q. Is it South Dade?

24 A. Uh-huh.

25 Q. Okay. Who's your present first level supervisor?

1 A. First level?

2 Well, April Ivy is the office manager.

3 Q. She would be a second level, wouldn't she?

4 A. Okay. Then Larry Gilly is an acting supervisor who is  
5 assigned to me.

6 Q. Who is your permanent supervisor in that position that  
7 Mr. Gilly is acting for?

8 A. Just him as far as I know.

9 Q. Okay. So your supervisor is not on just disability or  
10 out for awhile?

11 A. No.

12 Q. Who was your first level supervisor before Mr. Gilly?

13 A. Maria Smoak.

14 Q. Can you recall who it was before Ms. Smoak?

15 A. I believe it was Cheryl Johnson -- no. I'm sorry.  
16 I'll have to correct that. It was Prudence Taylor.

17 Q. Did you ever have Ms. Johnson as a supervisor?

18 A. Yes, further back.

19 Q. Do you remember any other supervisors other than the  
20 four that you have just named that were immediate or first  
21 level?

22 A. Ralph Mancusi, Maria Munoz, and going back further  
23 than that, Bryan Grant, and I think that's all that was  
24 assigned to me.

25 Q. Okay. And have you had any other second level

1 supervisors besides Ms. Ivy?

2 A. Yes. Larry Rorrer

3 Q. And that's R-O-R-R-E-R?

4 A. Yes. And Shirley Perring.

5 Q. Do you recall any others?

6 A. Hampton Booker possibly. I don't know if that was his  
7 title or not. I believe it was office manager.

8 Q. All right. Do you know who the operations manager is  
9 right now?

10 A. Tad Rubin.

11 Q. Do you recall who it was before Mr. Rubin took that  
12 position?

13 A. George Lewis.

14 Q. And was there anyone before Mr. Lewis that you served  
15 under?

16 A. Issie Perera.

17 Q. Briefly tell me or describe your duties as a  
18 maintenance administrator.

19 A. I screen trouble reports, I dispatch repairmen when  
20 it's needed. They have their CATs but occasionally they go  
21 down. I relieve the girl at the slick desk. I don't know if  
22 you're aware of that.

23 Q. No. Tell me what a slick desk is.

24 A. Pair gain cable. It's a special cable that  
25 requires -- they're systems that have to be monitored and



1 checked all the time. And Larry Gilly is over the cable group.  
2 And the slick desk is part of the cable group. And I've also  
3 been working at the CF desk on a relief basis relieving. And  
4 that is -- it's service orders that are sent to the cable  
5 department to gain facilities for the customer. In other  
6 words, there's no cable pair for a particular number.

7 I don't know if I'm saying this right.

8 Q. You're doing fine.

9 So in order for them to be in service or to get  
10 service, we have to have a new cable pair fixed up?

11 A. Right.

12 Q. You're doing great.

13 A. Thank you.

14 Q. You haven't lost me is so far, I don't think.

15 Is that finished, are you finished?

16 A. Yes.

17 Q. I don't want to cut you off.

18 Okay. Are you aware of the company objective that out  
19 of service reports be cleared within 24 hours?

20 A. Yes.

21 Q. Do you know if the Public Service Commission requires  
22 the company to clear out of service reports, at least 95  
23 percent of them within 24 hours?

24 A. Yes.

25 Q. And have you always known that?

1 A. Yes.

2 Q. Okay. Do you know if a customer is due a rebate if  
3 they're out of service more than 24 hours?

4 A. Yes.

5 Q. And have you always known that?

6 A. Yes.

7 Q. Ms. Koski, I'm going to show you a piece of paper.

8 This is titled Citizens Third Set of Interrogatories.

9 An interrogatory is a question that I've put down in  
10 writing and mailed to the company and they've given me a  
11 written answer back.

12 And I asked the company to give me the names of any  
13 employees who had knowledge about falsifying completion times  
14 on repair reports.

15

16

17

18 And what I'll do is at this point I'll go off the  
19 record, we'll stop the court reporter, and you'll have a chance  
20 to read this and you can talk about it to Ms. Baker, and then  
21 when you're ready, we'll go back on the record and I'll ask you  
22 some questions.

23 (Discussion off the record, with the agreement of the  
24 witness and all parties present).

25 BY MS. RICHARDSON:

1 Q.

2 A. Yes.

3 Q. All right. What information do you have about  
4 receiving instructions to back up clearing times?

5 MR. BEATTY: Objection to the form of the question.  
6 It's ambiguous.

7 A. What information do I have?

8 Like I should tell you --

9 MR. BEATTY: Well, ma'am, if you're not clear as to  
10 what she's asking --

11 BY MS. RICHARDSON:

12 Q. Okay. Do you have any information related to -- let  
13 me start over. What's a clearing time?

14 A. A clearing time is the actual time the customer was  
15 put back in service.

16 Q. Did you ever receive instructions to back up a  
17 clearing time?

18 MS. BAKER: Object to the form.

19 A. To back up the clearing time?

20 Only when the repairman, you know, wasn't clear about  
21 what the clearing time was. They call in and they might, you  
22 know, have put their tools away and done various jobs before  
23 they call in, and I always -- they instruct us to ask the  
24 repairman when did you actually give the customer service. And  
25 it's like, you know, usually a 20-minute leeway.

1 MS. BAKER: Just answer the question that's in front  
2 of you. Okay? Then she'll place another question and  
3 then you can answer the next question.

4 BY MS. RICHARDSON:

5 Q. Well, you can also finish your answer if you have  
6 more. I don't want to cut you off and I don't want you to be  
7 cut off, so if you have more to add, I want you to feel free to  
8 do that, too.

9 You finished so far?

10 A. Yes.

11 Q. When you received the instructions about the 20-minute  
12 interval --

13 MS. BAKER: I'm going to object to the form.

14 A. I'm sorry. I didn't hear that.

15 MS. BAKER: Excuse me. I want to object to the form.

16 I believe that that's not an accurate statement of the  
17 witness.

18 BY MS. RICHARDSON:

19 Q. What was this 20-minute interval related to?

20 MS. BAKER: Object to the form.

21 BY MS. RICHARDSON:

22 Q. You mentioned 20 minutes.

23 A. Yes.

24 Q. What did you mean by the "20 minutes"?

25 A. Well, the normal time that it would take a repairman

1 to maybe pack up his tools and get to a telephone that he could  
2 call us from. And sometimes they've even driven away and then  
3 call us.

4 Q. Okay. And when you were given this 20-minute time  
5 frame --

6 MS. BAKER: Objection.

7 A. No, that isn't something that they have given me.  
8 This is what I feel is the normal -- I mean --

9 MS. BAKER: Excuse me. There is actually no question  
10 pending. I objected. Ms. Richardson was in the middle of  
11 the question, and she needs to pose a question to you.  
12 You need to listen to the question and then you need to  
13 answer the question.

14 BY MS. RICHARDSON:

15 Q. That's okay, Ms. Koski. I'm going to see if I can ask  
16 this in a way that you and I can just communicate with each  
17 other.

18 MS. BAKER: By questions and answers, not my  
19 misstatements of her testimony and then having her answer  
20 to non-questions.

21 BY MS. RICHARDSON:

22 Q. Did you ever receive any instructions regarding this  
23 20-minute time period that you've just referred --

24 A. No.

25 Q. -- or spoken about?

1 A. No.

2 Q. Did any managers ever discuss with you the amount of  
3 time it might take a service technician to do routine work?

4 A. No.

5 Q. Where did you hear about this 20 minutes?

6 A. That's something I made up in my own mind. I feel  
7 like that is a normal time it might take a repairman to --  
8 after he's cleared a trouble, to call us and tell us it's okay.  
9 They do, you know -- well, I won't get into that.

10 MS. BAKER: If you answered the question, then you're  
11 allowed to stop talking. You don't have to keep talking.  
12 If you didn't answer the question, by all means say more  
13 but don't if you've answered.

14 THE WITNESS: Okay.

15 BY MS. RICHARDSON:

16 Q. Okay. When would you use this 20-minute period?

17 MS. BAKER: Just for the record, I'm going to object  
18 to the form.

19 Go ahead.

20 A. When the time was critical. Like if it was very close  
21 to missing the commitment and I felt like he had actually  
22 cleared the trouble before that.

23 Q. Okay. And when you say "missing the commitment," what  
24 do you mean by "missing the commitment"?

25 A. Missing the committed time that we have committed to

1 fixing the trouble and also the 24 hours.

2 Q. Okay. If the report had gone, say, 24 hours and ten  
3 minutes, an out of service report had taken 24 hours and ten  
4 minutes and that was what the ST had reported to you, that it  
5 had taken 24 hours and ten minutes to finish the work, what  
6 time would you put as the clearing time?

7 MS. BAKER: Object to the form.

8 Now you may answer.

9 A. I would ask the ST to think about, you know, the time  
10 that he actually gave the customer service, when did he get  
11 dial tone or whatever. You know, if it was noisy, when was the  
12 noise cleared. Well, out of service wouldn't affect a noisy  
13 problem. That would be the commitment. Okay.

14 Q. Okay. What time would you show then?

15 A. If he actually insisted that the time was ten minutes  
16 after the 24 hours, that's what I would put.

17 Q. Okay.

18 A. But I did question. We're instructed to question the  
19 repairman when did you give service.

20 Q. And if he didn't insist that it was 24 hours and ten  
21 minutes, what time would you put?

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

24 A. If he did insist?

25 Q. No, if he did not.

1           A.    I would question him further and say what time did he  
2    have service.

3           Q.    And if he wasn't absolutely certain, if he couldn't  
4    actually recall, what time would you put?

5           A.    Whatever time he told me to put.

6           Q.    Okay.  Were there ever any times any out of service  
7    reports that had gone over 24 hours where you made the  
8    assumption on your own that the trouble had been cleared  
9    actually 20 minutes earlier than the 24-hour period?

10          A.    No.

11                MS. BAKER:  Object to the form.

12   BY MS. RICHARDSON:

13          Q.    Did you ever receive instructions from any of your  
14    managers to back up the clearing time on an out of service  
15    report to show it cleared under 24 hours?

16                MS. BAKER:  Object to the form.

17                Go ahead and answer.

18          A.    They reminded us ask the repairman, be sure and ask  
19    the repairman when the trouble was actually cleared, not when  
20    they're calling in.  Because sometimes they, you know, take a  
21    break first, sometimes they don't call until the next day,  
22    sometimes they juggle two or three repair visits at one time.  
23    Maybe they can't get access to one so they move on to another  
24    one and then they go back to that one.  I always try to advise  
25    them just to no access it.



1 MR. BEATTY: I object to this process. Counsel by  
2 virtue of her silence is permitting this witness to give a  
3 narrative response that exceeds the scope of the question  
4 asked, and I would request that, counsel, when there's a  
5 reasonable pause, because we have a witness who is  
6 responsive to your pausing, where there is a reasonable  
7 pause, I would request that counsel pose the next  
8 question.

9 BY MS. RICHARDSON:

10 Q. Ms. Koski, I'd like to go back and ask maybe for a yes  
11 or no response from you.

12 Did you ever receive an instruction to show a clearing  
13 time that was earlier than the actual service restoral time?

14 MS. BAKER: Object to the form.

15 Now give an answer to that question if you  
16 can.

17 A. No.

18 BY MS. RICHARDSON:

19 Q. Do you know of anyone who recorded a time, a clearing  
20 time on a report that was earlier than the actual service  
21 restoral time?

22 A. No.

23 Q. I'm going to show you another page out of this same  
24 set of interrogatories, Ms. Koski. This one -- on this  
25 question I asked the company to give me the names of any

1 employees who had knowledge about recording out of service  
2 reports as affecting service reports,

3  
4  
5 And again, we'll go off the record and you'll have a  
6 chance to look at there and discuss it with Ms. Baker, and when  
7 you're ready, we'll go back on the record.

8 (Discussion off the record, with the agreement of the  
9 witness and all parties present)

10 BY MS. RICHARDSON:

11 Q. What information do you have regarding instructions  
12 not to status out of service on reports?

13 MS. BAKER: Object to the form.

14 A. What information do I have regarding not to status  
15 troubles out of service?

16 Q. Yes, ma'am.

17 A. I have no information on that.

18 Q. Okay. Can you tell me when a report is out of  
19 service?

20 A. Yes. There are several. If the customer says he has  
21 no dial tone is the main thing that we go by. If it's a good  
22 hard test like an open or a hard short or ground, it could be  
23 out of service but -- I mean, they could maybe call out but  
24 they couldn't receive calls. That's still out of service.

25 Q. Okay. Can you tell me what an affecting service

1 report would be?

2 A. Noisy, something that they could still use the phone  
3 but maybe the service wasn't as good a quality as they need.

4 Q. All right. Are there any reports that you know of  
5 that were or should have been statused out of service that were  
6 not statused out of service?

7 A. Reports that I know of?

8 MS. BAKER: I'm going to object to the form.

9 You can answer if you can.

10 A. No, not that I can recall.

11 BY MS. RICHARDSON:

12 Q. Okay. When you were working in the South Dade center,  
13 did any of your managers ever post notes or tell individuals  
14 don't status any out of services today?

15 A. Not to my knowledge.

16 Q. Okay.

17 A. Post notes or tell anyone?

18 Q. Yes.

19 A. Not to status them out of service?

20 Q. Right, yes, ma'am.

21 A. Maybe with an exception of one or two times that I'm  
22 aware of. Things were critical and the supervisor at the time  
23 said -- they talked to the whole group of us on a blanket scale  
24 and said don't status any more troubles out of service right  
25 now, things are critical. And I assumed --

1 MS. BAKER: Wait. Forgive me. We need to go by  
2 question and answers.

3 THE WITNESS: Okay.

4 MS. BAKER: I'm not sure any longer what the pending  
5 question is, but whatever it is, I don't know that you're  
6 answering it.

7 MS. RICHARDSON: She's answering it just fine.

8 MS. BAKER: I'd like the reporter to read back the  
9 question.

10 May I have that?

11 It's up to you, Ms. Richardson, if you want to pose a  
12 new question.

13 MS. RICHARDSON: I was ready to go to a new question.  
14 If you'd like the other question posed, we can do that. I  
15 mean, whatever suits you, Ms. Baker. If you want the last  
16 question read, that's fine, or I can just ask another one.

17 MS. BAKER: I would just assume you ask another one,  
18 but I do want to re-emphasize to both of you that this  
19 deposition has not been proceeding by questions and  
20 answers and it needs to.

21 MS. RICHARDSON: I would just like to say that in my  
22 opinion it has been proceeding by question and answer, and  
23 I'm satisfied with the way it's going. Just to put my two  
24 cents on the record, Ms. Koski.

25 BY MS. RICHARDSON:

1 Q. In your opinion when you said they were not -- the  
2 managers made a general statement that it was a critical day  
3 and you were not statusing any more out of services, in your  
4 opinion why was that being done?

5 A. That's not a yes or no answer.

6 Q. No, ma'am, it's not.

7 MS. BAKER: You're not restricted to yes or no answer,  
8 but try to restrict yourself to answering that question.

9 A. Okay. Because I felt that they were going to take it  
10 upon themselves to decide which reports that came in were out  
11 of service and which weren't.

12 BY MS. RICHARDSON:

13 Q. Okay. And do you know if they actually did make that  
14 decision?

15 A. No.

16 MR. BEATTY: No, they did not or no, you don't know?

17 No, they did not or no, you don't know? The question --

18 MS. BAKER: Can we have the question restated?

19 A. No, I have no knowledge that they actually did that.

20 BY MS. RICHARDSON:

21 Q. Okay. And you said this may have happened -- did this  
22 happen on more than one occasion?

23 A. Maybe two.

24 Q. And do you remember which managers gave you these  
25 instructions?

1 A. No, I don't remember.

2 Q. Can you tell me about how long ago this was?

3 A. It must have been about five years ago.

4 Q. Do you know if Ms. Taylor ever gave you this  
5 instruction, Prudence Taylor?

6 MR. BEATTY: Objection. Leading.

7 A. No.

8 BY MS. RICHARDSON:

9 Q. You don't know or she did not?

10 A. She didn't give them to me.

11 Q. Generally, do you know if Ms. Taylor generally made  
12 these instructions to the MAs?

13 A. I'm not aware.

14 Q. Do you know if Ms. Munoz generally gave these  
15 instructions to the MAs?

16 A. No.

17 Q. Do you know of any instances where affecting service  
18 reports like the noise report you mentioned were statused out  
19 of service when they shouldn't have been?

20 A. No.

21 Q. Okay. I'm going to show you another page from the  
22 same document.

23 This question asks the company to give me the names of  
24 employees who had knowledge about the use of recording improper  
25 exclusion codes on repair reports.

1  
2  
3  
4           And again, we'll go off the record and give you a  
5 chance to read this and you can discuss it with Ms. Baker.  
6 When you're ready, then we'll go back on the record and I'll  
7 ask you some more questions.

8           (Discussion off the record, with the agreement of the  
9 witness and all parties present)

10 BY MS. RICHARDSON:

11           Q.    Ms. Koski, can you tell me what an exclude code is?

12           A.    It's a report --

13                    An exclude code?

14                    That's a code that we exclude reports that aren't  
15 legitimate reports for some reason or another.

16           Q.    Okay. Can you give me an example of a report that  
17 would not be a legitimate report?

18                    MS. BAKER: Object to the form.

19           A.    A customer calls and says, I want to know about my  
20 bill. We don't do billing there.

21           Q.    Okay. Would an out of service report be an excludable  
22 report?

23           A.    It shouldn't be, no.

24           Q.    Do you know of anyone who has excluded an out of  
25 service report?

1 A. No.

2 Q. Do you know of any out of service reports that have  
3 been excluded?

4 A. No.

5 Q. When you close a report, a trouble report, a customer  
6 trouble report, do you have certain codes that you put on that  
7 report at closeout?

8 A. Yes.

9 Q. All right. Do you put a disposition code on that  
10 report at closeout?

11 A. Yes.

12 Q. Can you briefly explain to me what a disposition code  
13 is?

14 A. I'm trying to think of how to explain it to you.  
15 It tells primarily the condition by which you  
16 determine to close the trouble out.

17 Q. Okay. Would there be a disposition code if the  
18 problem was in the central office, a certain one to designate  
19 that the problem had been in the central office?

20 A. Yes.

21 Q. Would there be a different disposition code if the  
22 problem was in the cable?

23 A. Yes.

24 Q. Would there be a different disposition code if it was  
25 an inside wire problem?



1 A. Yes.

2 Q. Okay. Do you put cause codes on trouble reports when  
3 you close them out?

4 A. Yes.

5 Q. Can you briefly tell me what a cause code is?

6 A. A cause code would tell primarily what caused the  
7 problem.

8 Q. Can you think of any examples of cause codes?

9 A. Like weather, rodents, unknowns. I mean, sometimes  
10 you really cannot determine what really caused the trouble.

11 Q. Okay. Do you know if any of these disposition or  
12 cause codes when put on an out of service over 24-hours' report  
13 would keep it from counting as a miss against the company?

14 MS. BAKER: Object to the form.

15 A. A cause code?

16 BY MS. RICHARDSON:

17 Q. Yes.

18 A. I don't know. The only special cause code that I can  
19 ever remember using on a blanket scale would be like hurricane,  
20 but other than that, they're all different depending on, you  
21 know, what we think caused the problem. But, you know,  
22 screening --

23 MS. BAKER: I want you to think about whether you've  
24 answered the question.

25 Do you remember what the question is?

1 THE WITNESS: Yes.

2 MS. BAKER: If you remember it, I won't have it read  
3 back, but if you don't remember it, I'm going to ask that  
4 it be read back.

5 THE WITNESS: Well, would you read it back?

6 Maybe I got off track, maybe I misunderstood you.

7 (Thereupon the foregoing question was read back by the  
8 Court Reporter as above recorded)

9 A. No.

10 MS. BAKER: You're answer to that question is no.

11 THE WITNESS: No.

12 MS. RICHARDSON: Okay.

13 MS. BAKER: If we were in court, I would move to  
14 strike the entirety of the other answer you gave since it  
15 was not responsive to the question.

16 BY MS. RICHARDSON:

17 Q. When you spoke about blanket use of the hurricane  
18 code, were you speaking in reference to the Hurricane Andrew  
19 reports?

20 A. Yes.

21 Q. Do you know if the troubles that were caused by  
22 Hurricane Andrew that were not completed in 24 hours, did they  
23 count as a miss against the company on that 24 hour commitment?

24 A. I have no idea.

25 Q. Okay. I'm going to show you another document,

1 Ms. Koski.

2 This one is Southern Bell's Response to Preliminary  
3 Order Number PSC-93-0263-PCO-TL entered on February 19th, 1993,  
4 and this was filed by the company with the Public Service  
5 Commission on April 1st, 1993.

6 And there is a Jane Koski at number 312, and by your  
7 name there is a series of numbers. I believe you have a two,  
8 six, eight and 24; is that right?

9 A. Yes.

10 Q. All right. And then if you wanted to turn to page  
11 two, you could see what each one of those stands for. Up  
12 front. There you go. On that page and the page in front.

13 I'd like to ask you about number six which appeared by  
14 your name, and it indicates that you may have some information  
15 about building the base of out of service troubles.

16 Have you ever heard the phrase "building the base"?

17 A. Yes.

18 Q. And what does that mean?

19 A. I take it -- nobody has ever explained it to me, but I  
20 take it to mean separating the services from the out of  
21 services.

22 Q. Is there any more to your explanation?

23 A. No, not that I'm aware of.

24 Q. All right. Is your understanding of the phrase  
25 "building the base," that it is a proper activity?

1 MS. BAKER: Object to the form.

2 A. Building the base?

3 No, because I'm not that familiar with it.

4 MS. BAKER: Can I ask for clarification?

5 No means what? I don't understand your answer.

6 Forgive me. I realize this is out of turn.

7 Could I be allowed the indulgence of having the  
8 question read back and allowing the witness to answer it  
9 again?

10 MS. RICHARDSON: I don't mind but bear in mind that  
11 you're trying to get her to be very specific and limited  
12 on her responses to the answers, so she's just fighting  
13 against both here, giving me too much or not giving me  
14 enough.

15 MS. BAKER: I don't think her answer was responsive to  
16 the question.

17 BY MS. RICHARDSON:

18 Q. Let me ask it differently. Maybe we can do that and  
19 get to the same point Ms. Baker wants to get to.

20 Do you have any understanding of whether or not  
21 building the base is a proper activity or an improper activity  
22 to be doing in the company?

23 A. No.

24 Q. You have no understanding?

25 MS. BAKER: I want it on the record that I object to

1 the question.

2 Now, may we have the witness' answer?

3 A. No.

4 BY MS. RICHARDSON:

5 Q. By your name also appears the number 24, Ms. Koski,  
6 and 24 indicates special services or special circuits.

7 Do you know of any improper handling of special  
8 service tickets?

9 A. No.

10 Q. Do you know what a no access code is?

11 A. Yes.

12 Q. Can you briefly explain what no access means?

13 A. That's a code that we enter when a repairman cannot  
14 gain access to the customer's premise or to the equipment that  
15 he needs to repair.

16 Q. Okay. Do you know if that no access code would stop  
17 that 24-hour commitment clock?

18 A. Yes, uh-huh.

19 Q. Do you know of anyone who has taken out of service  
20 reports and put no access on them just to stop that 24-hour  
21 clock?

22 A. No.

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

25 A. No.

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

3 A. Has no accessed a report before it was dispatched?

4 With the exception of maybe one or two in the time  
5 that I have been an MA, maybe. For maybe an unusual  
6 circumstance. I can't remember just what it would be at the  
7 present time but maybe the --

8 MS. BAKER: Is your answer, other than what I've just  
9 said, no?

10 MS. RICHARDSON: She said except for one or two that  
11 she recalled.

12 MS. BAKER: I didn't hear a yes or no.

13 Is your answer, other than what I've said, no?

14 BY MS. RICHARDSON:

15 Q. Let me ask you the question again, Ms. Koski.

16 Do you know of any out of service reports that were no  
17 accessed before the report was dispatched?

18 A. Before the report was dispatched?

19 Q. Yes, ma'am.

20 A. No.

21 Q. Do you know what the CON code, the C-O-N, carry over  
22 no code is?

23 A. No.

24 Q. Do you know what a test okay is?

25 A. Yes.

1 Q. Would you briefly describe the test okay?

2 A. There are certain VER codes. A VER code zero is a  
3 test okay. Well, that's really the only test okay.

4 Q. Can an out of service report be a test okay report?

5 MR. BEATTY: Object to the form of the question. It's  
6 ambiguous.

7 You can respond.

8 A. Yes.

9 BY MS. RICHARDSON:

10 Q. Have you ever had a service affecting report that  
11 tested okay, that you called the customer and they said their  
12 line was in service and that report was closed out of service?

13 MS. BAKER: Object to the form.

14 A. No.

15 BY MS. RICHARDSON:

16 Q. Do you know of anyone who has taken a batch of test  
17 okay reports and closed them to out of service?

18 A. No.

19 Q. Have you ever heard of that being done?

20 A. No.

21 Q. Have you ever had a manager give instructions to the  
22 MAs that before they close out an out of service report that  
23 was going over 24 hours that they had to have the manager's  
24 initials on that report?

25 A. Yes.

1 Q. And do you recall who gave those instructions?

2 A. No.

3 Q. Do you recall about when those instructions or  
4 procedures were followed?

5 A. About three or four years ago.

6 Q. Okay. Do you remember why those instructions were  
7 given?

8 A. No.

9 Q. Did you ever have an out of service report that had  
10 gone over 24 hours yourself that you had to take to a manager  
11 and have their initials put on the report?

12 A. I can't remember.

13 Q. Do you know what an employee originated report is?

14 A. Yes.

15 Q. Could you briefly explain an employee originated  
16 report?

17 A. That's a report that is brought up by an employee.

18 Q. All right. If there was a service technician outside  
19 working on a line and another customer, not the one he's  
20 working on, but a different customer came up and said, my phone  
21 is dead, would you please call in a report for me, and the  
22 employee called that report in, would that be an employee  
23 report?

24 MS. BAKER: Object to the form.

25 Go ahead and answer it.



1 A. That's very technical.

2 MR. BEATTY: If you know, ma'am. If you know.

3 MS. BAKER: If you know, you should answer. If you  
4 don't know, you should say I don't know.

5 A. I don't know.

6 MS. BAKER: If you don't understand the question, you  
7 can ask to have it repeated.

8 I'm sorry. Did you get the witness'  
9 answer?

10 BY MS. RICHARDSON:

11 Q. What is a customer direct report?

12 A. That's a report made by a customer.

13 Q. Okay. Do you know of any customer direct reports that  
14 were input as employee originated reports?

15 A. No.

16 Q. Do you know of any out of service reports that were  
17 about to go over 24 hours that were closed and then reopened as  
18 employee reports in order to finish the work?

19 A. I can't remember.

20 Q. Do you know of anyone who has used somebody else's  
21 employee code?

22 A. No.

23 Q. Has anybody ever used your employee code?

24 MS. BAKER: Other than herself, you mean?

25 BY MS. RICHARDSON:

1 Q. Oh, yeah, other than yourself.

2 Anyone else ever used your employee code?

3 A. Yes.

4 Q. Can you tell me who?

5 A. There were one or two reports in the whole time that  
6 I've been an MA that I found that, you know, it wasn't the way  
7 that I would have worded it. You know, you can't remember  
8 every report that you close out, but you know the way you word  
9 things.

10 Q. Okay. Do you know who used your employee code on  
11 those reports?

12 A. No.

13 MR. BEATTY: Object to the form of the question. It  
14 presumes facts not in the record. She's never testified  
15 that someone else -- that she categorically can state that  
16 someone else used her employee code.

17 BY MS. RICHARDSON:

18 Q. Okay. On those reports that you just recalled, did  
19 you recall whether or not you handled those reports?

20 A. No.

21 Q. Do you know if somebody else used your code on those  
22 reports?

23 A. No.

24 Q. Did you report this to a manager at the time that you  
25 thought --

1 A. Yes.

2 Q. Which manager did you report to?

3 A. I don't remember.

4 Q. Did your manager investigate your report?

5 A. I don't know.

6 Q. Did your manager ever come back to you and confirm or  
7 deny that it was your code used by someone else?

8 A. No.

9 Q. Were you at work the day that the report with your  
10 code number on it was processed?

11 MS. BAKER: If you know.

12 A. I can't remember.

13 BY MS. RICHARDSON:

14 Q. Do you know of anyone who has put false information on  
15 a customer trouble report?

16 MS. BAKER: Object to the form.

17 A. That has put false information on a customer's trouble  
18 report?

19 BY MS. RICHARDSON:

20 Q. Yes, ma'am, that's the question.

21 A. Are you talking about in the screening of the report,  
22 false information?

23 Not that I'm aware of, no.

24 Q. Okay. Then let's push it further down into the  
25 report.

1 Do you know of anyone who has put false codes like  
2 disposition and cause codes on a trouble report?

3 MS. BAKER: Object to the form.

4 MR. BEATTY: I too object to the form on the basis  
5 that it is ambiguous. The use of the term "false could"  
6 possibly include inaccurate and without any further  
7 clarification, I object.

8 BY MS. RICHARDSON:

9 Q. Can you answer the question?

10 A. Do I know of anyone who closed a report out with false  
11 information?

12 Q. Yes, ma'am.

13 A. With the exception of maybe one or two reports, and  
14 those were --

15 MS. BAKER: Is it a yes or no with the exception you  
16 haven't said? Can you just said whether it's yes or no?

17 A. Yes.

18 BY MS. RICHARDSON:

19 Q. Okay. Now with the exception. If you would continue  
20 your answer?

21 MS. RICHARDSON: She gave a yes with the exception.

22 MS. BAKER: Well, she actually gave an answer she  
23 didn't intend. I'd like the question to be read back to  
24 her and listen carefully and then start it with a yes or  
25 no and then give your explanation, please.

1 (Thereupon the foregoing question was read  
2 back by the Court Reporter as above recorded)

3 MS. BAKER: Can you stop there?

4 You answered the question without the exception. I  
5 don't know if you were saying yes, with the exception or  
6 no, with the exception, and the record doesn't show.

7 Do you have the question in mind?

8 THE WITNESS: Yes.

9 MS. BAKER: Are you answering my question? You have  
10 the question in mind?

11 THE WITNESS: Yes.

12 MS. BAKER: Now answer the question then.

13 THE WITNESS: Yes.

14 MS. BAKER: Now give your answer to the question,  
15 please.

16 A. I know of two instances that I can think of that maybe  
17 the repairman had a choice of things that he could close it out  
18 to. He had done -- maybe had multiple trouble, but I don't  
19 consider that to be false.

20 Q. Can you explain what you mean by "multiple trouble"?

21 A. It's a trouble report that has more than one problem.

22 Q. So he had a choice between different disposition  
23 codes? Is that what you're saying?

24 A. Yes.

25 Q. Okay. So either code might have been properly used?

1 A. Yes.

2 Q. Ms. Koski, have you ever been disciplined in relation  
3 to your handling of customer trouble records?

4 A. No.

5 Q. Have you ever filed a grievance?

6 A. Filed a grievance?

7 Q. Yes.

8 A. Yes.

9 Q. Has that grievance that you filed been related to the  
10 customer trouble reporting process in any way?

11 A. No.

12 Q. Has anyone ever asked you to help sell products or  
13 services for the company?

14 A. Yes.

15 Q. Who asked you?

16 A. I can't remember. A supervisor.

17 Q. Can you remember about when you were asked?

18 A. Yes.

19 Q. Can you tell me when?

20 A. Approximately four years ago.

21 Q. Okay. And did you actually help sell products or  
22 services for the company?

23 A. I think it was longer than that. Maybe five or six.  
24 Yes.

25 Q. All right. Did you receive any special sales training

1 for this work?

2 A. No.

3 Q. Did anyone ask you to keep track of the amount of time  
4 you spent talking to a customer about a sale as opposed to the  
5 amount of time you spent talking about their repair problem?

6 A. No.

7 Q. Did you win any prizes or awards?

8 A. Yes.

9 Q. What did you get?

10 A. Oh, a vacuum cleaner.

11 Q. Do you know of anyone who recorded a sale to a  
12 customer that the customer did not authorize?

13 A. No.

14 Q. Have you heard of that being done?

15 A. No.

16 MS. RICHARDSON: Ms. Koski, I want to thank you for  
17 your time and for attempting to answer all my questions  
18 for me. I appreciate that.

19 I don't know if there are any other  
20 questions from anyone else.

21 MS. BAKER: That's it. You're free to go, I think.

22 Wait a minute.

23 MS. RICHARDSON: I'm sorry. As far as we're  
24 concerned, you're through for the moment.

25 MS. BAKER: We have no further questions or I have no

further questions.

(Thereupon the deposition was concluded at 4:20 p.m.)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
DEHLIA JANE KOSKI

Sworn to and subscribed before me this \_\_\_\_\_  
day of \_\_\_\_\_, 1993.

\_\_\_\_\_  
Notary Public, State of Florida At Large

My Notary Commission No. \_\_\_\_\_

Expires:  
  
\_\_\_\_\_



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 DEHLIA JANE KOSKI, 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 40 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

Registered Professional Reporter  
Certified Shorthand Reporter and  
Notary Public - State of Florida  
1014 Ingraham Building  
25 Southeast 2nd Avenue  
Miami, Florida 33131  
(305) 371-6228

My Notary Commission No. CC194782  
Expires: May 16, 1996

