

BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION

920200  
DOCKET NO. 910163-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: RONALD BATES

DATE: June 29, 1993

TIME: Commenced at: 1:30 p.m.  
Concluded at: 2:10 p.m.

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

REPORTED BY: JOHN J. BLUE,  
Registered Professional Reporter,  
Notary Public, State of Florida At Large  
Suite 1014, Ingraham Building  
25 Southeast 2nd Avenue  
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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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FPSC-RECORDS/REPORTING

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Miami, Florida 33130  
(305) 530-5561

**I-N-D-E-X****WITNESS****DIRECT CROSS**

Ronald Bates

(Ms. Richardson)

4

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**EXHIBITS**

(None)

1 THEREUPON:

2 RONALD BATES,

3 having been first duly sworn, was

4 examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. RICHARDSON:

7 Q. Mr. Bates, would you please state your name and spell  
8 it for the Court Reporter?

9 A. Yes. Ronald Bates, R-o-n-a-l-d B-a-t-e-s.

10 Q. And your address, Mr. Bates?

11 A.

12 Q. Is there a Zip code for that?

13 A.

14 Q. And your phone number?

15 A.

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

17 A. No, ma'am.

18 Q. Have you discussed this deposition with anyone other  
19 than counsel for Southern Bell?

20 A. No.

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

23 A. Yes, ma'am.

24 Q. Has anyone advised you of the possible criminal  
25 penalties that could apply if you perjure your testimony here

1 today?

2 A. I'm aware of them, yes, ma'am.

3 Q. All right. Have you given a statement to the company  
4 in the past?

5 A. Yes, ma'am.

6 Q. Do you remember when that was?

7 A. No.

8 Q. Okay.

9 A. Let me share something with you, Sue.

10 Q. All right.

11 A. August 24th, 1992, I went through the worst disaster,  
12 you know, Hurricane Andrew. So that's, you know, been on my  
13 mind, and we have been working a lot of hours and such; so I'll  
14 be as straight and remember all that I can and whatever I can  
15 be helpful for.

16 Q. Okay. And just tell me if you don't remember, just  
17 say "I don't remember" and we'll go on to the next question.

18 A. Okay.

19 Q. I may, however, try to ask you a question in a  
20 different way that may cause you to remember something that you  
21 didn't remember earlier, if that's okay.

22 A. Okay.

23 Q. All right. But you do remember making a statement at  
24 some time?

25 A. (Nods yes)

1 Q. Do you remember who was in the room with you when you  
2 made that statement?

3 A. No.

4 Q. Do you know if there was an attorney present?

5 A. I think so.

6 Q. Do you know if there was someone from Security  
7 present?

8 A. I really think so, yes.

9 Q. Are you a member of the Union?

10 A. Yes, ma'am.

11 Q. Did you have someone from the Union with you that day?

12 A. No, I don't think so.

13 Q. Do you remember if you discussed that statement with  
14 anybody else?

15 A. Not-- No.

16 Q. What is your position with the company?

17 A. Facility Technician, FT.

18 Q. And how long have you been an FT?

19 A. That's a new title; so -- five or six years, two or  
20 three years.

21 But Cable Repair was the original title, and  
22 I have been a cable repairman for 24 years.

23 Q. Is that the first job you held with the company?

24 A. No, ma'am.

25 Q. What did you start at?

- 1 A. A lineman
- 2 Q. Was that also working cable?
- 3 A. Putting up cable, yes, ma'am.
- 4 Q. Have all of your 24 years as cable repairman been here
- 5 in Miami?
- 6 A. Yes.
- 7 Q. Has all of it been down in Homestead?
- 8 A. No.
- 9 Q. What areas of Miami have you worked in?
- 10 A. (No response)
- 11 Q. How about what centers in Miami?
- 12 A. All of them, from Key West to canal, to 27, to Gables,
- 13 I guess you could say Northwest 12th Street south.
- 14 Q. Do you presently do any work in the Key West area?
- 15 A. No, ma'am.
- 16 Q. Who is your present first level supervisor?
- 17 A. Robert Connor. C-O-N-N-O-R.
- 18 Q. And how long has Mr. Connor been your supervisor?
- 19 A. Six months.
- 20 Q. Who was it before Mr. Connor?
- 21 A. Joe Sibarosky (phonetic).
- 22 Q. Can you spell his last name at all?
- 23 A. S-O-B-I-E-R-- I lose it, I don't know.
- 24 Q. "-- osky," maybe "-o-s-k-y"?
- 25 A. That sounds good.

1 Q. And how long was Joe your first level supervisor?

2 A. I'm sorry, Sue. About a year or so.

3 Q. Okay. Do you recall who it was before Mr. Sibarosky  
4 was your supervisor?

5 A. I don't know about sequence, but this -- Tony Ferrer.

6 Q. All right. Out of sequence even, do you remember any  
7 other first level supervisors that you've had within the last  
8 say ten years?

9 A. I'm sure there's a lot more, Sue, but I can't think of  
10 them right now.

11 Q. What about second level supervisors? Who is your  
12 present second level supervisor?

13 A. Al Scullli.

14 Q. And how long has he been your second level supervisor?

15 A. Three or four years.

16 Q. Do you remember who it was before Mr. Scullli?

17 A. Yeah, but I can't-- I can't think of his name right  
18 now.

19 Q. Do you know who your Operations Manager is, right now?

20 A. What --?

21 Q. District Manager?

22 A. Okay. Tad Rubin.

23 I think Miss Eisenhower is the Operations Manager.

24 Q. Or General Manager?

25 A. Yeah, there you go. See, they change those things so

1 much I don't know anymore.

2 Q. How long has Mr. Rubin been your District Manager?

3 A. About the same, three or four years.

4 Q. Do you recall who it was before Mr. Rubin?

5 A. Izzy Perrera comes to mind. I don't know.

6 Q. Perrera, P-e-r-r-e-r-a?

7 A. Yes, ma'am.

8 Q. Who is your Shop Steward right now, Union steward?

9 A. I think it's Bob Krepes.

10 Q. K-R-E-P-E-S?

11 A. Yes.

12 Q. What does a cable repairman do, Mr. Bates?

13 A. Just literally what it implies. We fix cables that  
14 are cut, broken, lightning, any type of damage, whether it's  
15 aerial, buried or underground, we fix cables.

16 Q. Are individual residential customers affected by the  
17 work you do?

18 A. Yes, ma'am.

19 Q. Are business customers affected also?

20 A. Yes, ma'am.

21 Q. Do you deal with trouble reports themselves?

22 A. Yes, ma'am.

23 Q. Are you familiar with or are you aware of the  
24 company's requirement that out of service reports be cleared  
25 within 24 hours?

1 A. Yes.

2 Q. Have you always known that?

3 A. Yes. It seems to have changed or I don't remember;  
4 you know, 15, 20 years ago it's one thing; but I've always  
5 known there was a requirement for service, yes, ma'am.

6 Q. Okay. Do you know if the Public Service Commission  
7 requires the company to complete at least 95 percent of its out  
8 of service reports within 24 hours?

9 A. (Shakes head in the negative) Unt-uh.

10 Q. Thats a "no"?

11 A. "No."

12 Q. He can't take a head shake.

13 A. Right. I grunted a little bit lower. No.

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

16 A. (Shakes head in the negative). I've heard it, but,  
17 you know, to come out and -- Yes. I have, yes.

18 Q. Okay. Have you always known that, ever since you  
19 started with the company, or --

20 A. No.

21 Q. -- is that recent knowledge for you?

22 A. You know, last 10 or 15 years, maybe.

23 Q. Okay. Mr. Bates, I want to show you a document. And  
24 I'll introduce it for the record first.

25 This is Southern Bell's Response to Preliminary Order

1 Number PSC 93-0263 PCO-TL entered on February 19, 1993. And  
2 this was filed by the company in their rate case with the  
3 Commission on April 1st, 1993.

4 And there's a Ronald Bates, number 23.

5 I want you to take that and you can look at it.

6 A. All right, fine.

7 Q. Have you seen this document?

8 MS. RICHARDSON: We will go off the record for a  
9 moment.

10 A. Yes. Nancy in there showed it to me.

11 MS. RICHARDSON: We're off the record.

12 (Discussion off the record, with the agreement  
13 of the witness and all parties present)

14 Q. (BY MS. RICHARDSON): Mr. Bates, there appears a  
15 series of numbers by your name on this document, and I'd like  
16 to discuss some of these with you.

17 Number one comes after your name, and that indicates  
18 that you might have some information about backing up clearing  
19 or closing times.

20 Can you tell me what a clearing time is on a report or  
21 on a trouble?

22 A. That's the time you get when you get the trouble that  
23 was designated to have it cleared by.

24 Q. What is a closing time on the trouble report?

25 A. When you finish the trouble.

1 Q. Why would there be a difference between a clearing and  
2 a closing time?

3 A. There is a difference between clearing and closing  
4 because you can clear the trouble and have another two or three  
5 hours' work. You can give the customer dial tone before you  
6 finish your job.

7 Q. Okay. Have you ever heard of anyone backing up the  
8 time?

9 A. No.

10 Q. Do you know of anyone who has reported a clearing time  
11 on a trouble that was earlier than the service restoral time?

12 A. No.

13 Q. Have any managers ever asked you to show a report  
14 cleared under the 24-hour time limit even though the work had  
15 actually taken longer?

16 A. No.

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

18 A. No.

19 Q. Let me ask this. Do you have a CAT terminal?

20 A. Yes.

21 Q. Can you clear and close reports on your own?

22 A. Yes.

23 Q. Do you enter a clearing time for your report now?

24 A. Yes.

25 Q. Will the terminal accept a clearing time earlier than

1 the actual time that is being shown as the real time on the  
2 terminal?

3 A. Say that one more time?

4 Q. Let me try it again. Whenever you're looking at your  
5 CAT terminal does it show you what time of day it is at  
6 present?

7 A. Yes. What time of day?

8 Q. Yes.

9 A. No; it shows you the date.

10 Q. It shows you the date?

11 A. Yes.

12 Q. And is there a place in there for you to enter a  
13 clearing time on a report?

14 A. Yes.

15 Q. And that place where you enter a clearing time, is  
16 there a time already in there that shows the present time?

17 A. No.

18 Q. Will the terminal accept an earlier time than the  
19 present time on that clearing line?

20 A. I guess. The reason I hesitate is the CAT, to me, is  
21 to close out the trouble and show the work I've done; and to  
22 analyze it when I go through it, you know, I just go through  
23 the steps.

24 Q. So you have to think back in your head when I ask the  
25 questions?

1 A. Right.

2 Q. Well, take the time you need. You know, if you need a  
3 few moments to sit and think back through the steps before you  
4 answer, please make yourself comfortable with doing that,  
5 that's fine.

6 Have you ever had occasion then, when you were getting  
7 ready to close out your report, to enter a time that's earlier  
8 than the present time on that clearing line?

9 A. No. When you said present time--

10 Q. The time that you're typing in. Let me give you an  
11 example.

12 A. Let's do that.

13 Q. Let's just use some numbers.

14 A. Okay.

15 Q. That will be easier. Okay. You've worked a  
16 particular problem, cable problem--

17 A. Um-hum.

18 Q. -- and you're ready to close it out, and it's now 4:00  
19 o'clock in the afternoon.

20 A. Um-hum.

21 Q. And you gave the customer his dial tone at 3:00  
22 o'clock.

23 A. Um-hum.

24 Q. Are you able then to enter 3:00 o'clock as the  
25 clearing time in your CAT terminal?

1 A. Yes.

2 Q. Do you know what time will be shown on that customer  
3 record as the time that you finished the repairs?

4 A. Yes.

5 Q. What time shows up as the time that you finished that  
6 repair on the customer record?

7 A. Whatever time that I put at the time at the completion  
8 of that trouble.

9 Q. Okay.

10 A. So it could vary from the closing time.

11 Q. All right. Before you used a CAT terminal, would you  
12 have to call in to the Maintenance Center to have an M.A. clear  
13 your reports for you?

14 A. Before we got the CAT?

15 Q. Before the CAT.

16 A. Yes, ma'am.

17 Q. All right. And when you were calling in to close the  
18 reports at that time, were you ever questioned as to whether or  
19 not you had cleared it earlier than the time you were calling  
20 in?

21 A. No, ma'am. We went through a step procedure, and we  
22 just went through it and told them the time you cleared it and  
23 then the time you completed it and such. They didn't ask,  
24 unless they misunderstood you or something, they didn't ask  
25 questions.

1 Q. Have you ever had reports, out of service reports,  
2 take longer than 24 hours to repair?

3 A. Yes.

4 Q. And on those occasions did you ever have to call those  
5 type of reports in to close them out?

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

7 It's ambiguous as to time.

8 MS. RICHARDSON: All right.

9 Q. (BY MS. RICHARDSON): Have you ever, before you had  
10 the CAT terminal, did you ever have to call in to close out an  
11 out of service that had gone longer than 24 hours?

12 A. Yes.

13 Q. And when you called in, did the M.A. question you  
14 about whether or not you had really cleared this report under  
15 the 24-hour period?

16 A. No.

17 Q. Did she put you on notice that you had missed the  
18 24-hour commitment on that report?

19 A. Well, you're-- you can be made aware of it, yes;  
20 I have been made aware of it, yes, ma'am.

21 Q. Let me show you one other document. Mr. Bates, this  
22 document is called Citizens Third Set of Interrogatories. An  
23 interrogatory is a question that's put down in writing and I've  
24 mailed it to the company, and the company has given me a  
25 written answer in writing and mailed it back. This one is

1 dated June 6, 1991.

2 And I asked the company to identify all the employees  
3 who had knowledge about falsifying completion times on repair  
4 reports.

5  
6  
7  
8 At this point I'm going to go off the record and let  
9 you read this; and then if you want to discuss it with  
10 Mr. Beatty, that's fine. When you're ready we will go back on  
11 the record and I'll ask you questions about it.

12 (Thereupon the deposition was recessed briefly  
13 and was thereafter resumed, with the agreement of the  
14 witness and all parties present)

15  
16  
17  
18 Q. What other information do you have other than what  
19 we've already talked about, about backing up clearing times on  
20 out of service reports?

21 MR. BEATTY: If anything at all.

22 A. That about covers it, Sue, as far as my knowledge.

23 Q. (BY MS. RICHARDSON): All right. By your name appears  
24 a number two on this other document, Southern Bell's response  
25 document, and it indicates that you might have some information

1 about the use of cause codes.

2 Can you tell me what a cause code is?

3 A. It's the number we use to show the type of trouble.

4 No, the cause code is who caused the trouble, who and  
5 what.

6 Q. Okay. Can you give me an example?

7 A. Cause code one hundred would be a Bell workman. 450  
8 is a hurricane. Is that what you mean?

9 Q. Yes. All right. And do you know if there are certain  
10 cause codes that would keep an out of service over 24-hour  
11 report from being counted as a miss by the company?

12 A. No.

13 Q. Do you know of anyone who has directed you to use a  
14 cause code for situations where it did not apply?

15 A. No.

16 Q. Have you ever been asked to use a tornado code for a  
17 tornado that occurred in Hialeah on all out of service reports,  
18 whether the tornado code applied or not?

19 A. No.

20 Q. Have you ever been asked to use any other cause  
21 code -- Let me take that back. Let me ask you another  
22 question.

23 Is moisture a cause code?

24 A. Yes; 420.

25 Q. Is that one you use frequently?

1 A. It's-- Yes. When you say "frequently," we use it as  
2 much as any of them.

3 Q. In terms of cable repair work, if there was a break in  
4 the cable, and water had gotten into the cable, which code or  
5 what cause code would you normally use to indicate the failure?

6 A. Well, if you can see where the water come in, the  
7 break point, you would charge it to the break point.

8 If you couldn't find it, then you would show it to the  
9 moisture.

10 Q. Okay. Have you ever been directed by a manager to use  
11 the moisture code instead of a code that related to the reason  
12 for the break in a cable?

13 A. No.

14 Q. By your name also appears the number eight; and it  
15 indicates that you may have some information about receiving  
16 instructions not to status out of service.

17 Has anyone ever told you not to status a trouble as  
18 out of service today?

19 A. No, ma'am.

20 Q. When you receive reports, trouble reports, do you ever  
21 have occasion to status the report yourself as out of service  
22 or affecting service?

23 A. No, ma'am.

24 Q. Have you ever received an affecting service report  
25 that once you got out there to work on the line you found the

1 customer actually was out of service, they had no dial tone?

2 A. Say that one more time, Sue.

3 Q. I will. Is noise an out of service type condition?

4 A. I wouldn't think so.

5 Q. All right. Have you ever gotten a noise report, where  
6 the customer could use the line but there was some noise on it,  
7 and you got out there to check it out and you found out that  
8 the cable failure was serious enough that actually the customer  
9 ended up with no dial tone?

10 A. Yes.

11 Q. Under those circumstances, when you closed that report  
12 out did you have occasion then to restatus it to an out of  
13 service condition?

14 A. No.

15 Q. Did you ever report to an M.A. when you called in to  
16 close out that type of report that "I got out here and it was  
17 really out of service, so you need to do something with it"?

18 A. No.

19 Q. Do you work with bulk stasured cable reports?

20 A. Explain it, Sue.

21 Q. All right. When you receive an cable problem do you  
22 get a lead ticket that has a bunch of other ticket numbers  
23 associated with it?

24 A. Like a cable failure?

25 Q. Yes.

1 A. Yes.

2 Q. All right. And do you know if, when you close the  
3 lead ticket out, does that close out all those attached  
4 tickets?

5 A. In our situation the CAT does not accept or it's not  
6 programmed for us to close failures; so if we have a failure,  
7 then we call it live to the M.A.

8 Q. Were you working cable failures before you received  
9 the CAT terminal?

10 A. Yes, ma'am.

11 Q. And in those days before the CAT terminal, when you  
12 called the M.A. to close out the lead ticket do you know if  
13 that would also close out all those attached tickets?

14 A. I'm not sure, Sue; because I just closed out the one,  
15 and then I don't know. I just assumed they were.

16 Q. Okay. Do you know if closing out the lead ticket,  
17 when you closed it out, if the same information that you gave  
18 for the lead ticket would appear on all the attached tickets?

19 MR. BEATTY: I object to the form of the question. It  
20 causes this witness to speculate. He indicated he doesn't  
21 know.

22 A. I don't know for sure, Sue.

23 Q. (BY MS. RICHARDSON): All right. Did an M.A. ever  
24 indicate to you when you were working on trouble reports that  
25 "we're not statusing any out of service reports today"?

1 A. No.

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

3 A. (Shakes head in the negative). No.

4 Q. On any occasion, do you know if trouble reports were  
5 not statused up front but waited until close out to be statused  
6 either out of service or affecting service?

7 A. I don't know, Sue.

8 Q. Okay. By your name appears number eleven, and that  
9 indicates that you may have some information about the improper  
10 preparation of trouble reports.

11 What do you know about the improper preparation of  
12 trouble reports?

13 MR. BEATTY: Object to the form of the question. It  
14 presupposes that he has some knowledge about that. It's  
15 ambiguous.

16 If you know anything?

17 A. I-- They must have put a mistake down by that one,  
18 Sue, because I can't think of anything I might know.

19 Q. (BY MS. RICHARDSON): Okay. When you close a report  
20 do you also input a disposition code on a report?

21 A. Yes.

22 Q. Can you briefly tell me what a disposition code is?

23 A. That's where it is, in relation to the cable and the  
24 telephone network.

25 Q. Do you ever have occasion to use the inside wire

1 codes?

2 A. No.

3 Q. Do you ever have occasion to use the 320 multiple  
4 cable failure code?

5 A. Yes.

6 Q. Have you ever had occasion to use that multiple cable  
7 failure code when it did not apply to a report?

8 A. No.

9 Q. Can you define multiple cable failure for me?

10 A. 600 pair or larger.

11 Q. Have you ever had a manager tell you to use the 320  
12 multiple cable failure code for any cable failure that was less  
13 than 600 pair?

14 A. No.

15 Q. Do you know whether that particular code would keep a  
16 cable report from being counted as a miss against the company  
17 if that report was longer than 24 hours?

18 A. No.

19 Q. Number 17 is by your name also, and that indicates  
20 that you may have had occasion where intimidation or pressure  
21 was placed upon you in handling of trouble reports.

22 Has that ever occurred?

23 A. Never.

24 Q. Have you ever had a manager tell you not to close out  
25 an out of service report that was going over 24 hours without

1 contacting the manager for permission to close?

2 A. No.

3 Q. Do you know of anybody who has used somebody else's  
4 employee code?

5 A. No.

6 Q. Have you ever heard of that happening?

7 A. No.

8 Q. Do you know what an employee report is?

9 A. Yes. Well, it's when an employee makes up a report on  
10 a trouble, either by theirselves or something, that a customer  
11 told you about.

12 Q. Okay. And I'm going to try this one more time. I  
13 want to make sure I understood you.

14 So if a repairman is outside working on one problem  
15 and a customer comes up to the repairman and says "My phone is  
16 dead, would you please call a report in for me," is that an  
17 employee report?

18 A. It can be, if the customer hasn't called it in prior.  
19 Then you can make an employee report, and fix that phone.

20 Q. Okay. And would you call the maintenance center on  
21 that to get one started?

22 A. Yes.

23 Q. And has that always been the procedure that you have  
24 been told to follow on those type of reports?

25 A. Yes.

1 Q. Have you actually opened an employee report like that  
2 of that nature?

3 A. Yes.

4 Q. Have any of those been out of service reports?

5 A. I don't remember.

6 Q. Do you remember which manager gave you that  
7 instruction as to how to handle that?

8 A. No.

9 Q. Do you know what a customer direct report is?

10 A. Customer oriented, customer calls it in. That's my  
11 opinion.

12 Q. Okay. Do you know of anyone who has taken an out of  
13 service report that was about to go over that 24-hour time  
14 line, close it out, and then reopen it as an employee report?

15 A. No.

16 Q. Do you know of anyone who has backed up a commitment  
17 time on a trouble report?

18 A. No, ma'am.

19 Q. Do you know of anyone who has taken a batch of  
20 affecting service reports and closed them out as out of  
21 service?

22 A. No, ma'am.

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

24 A. No.

25 Q. Do you know if the company has a process, a

1 computerized answering system that would accept trouble reports  
2 through a computer?

3 A. No, I don't know.

4 Q. Do you know of anyone who has created a fictitious  
5 cable failure?

6 A. No.

7 Q. Do you know of anyone who has created fictitious  
8 trouble reports?

9 A. No.

10 Q. Have you ever heard of an occasion in Key West where  
11 an individual took a phone book and took the names down and  
12 created a report by the names listed in the phone book?

13 A. No, ma'am.

14 Q. Have you ever heard the phrase "we don't miss any out  
15 of services in the Keys"?

16 A. No, ma'am.

17 Q. Have you ever been disciplined by the company for your  
18 handling of customer trouble records?

19 A. No, ma'am.

20 Q. Have you ever filed a grievance?

21 A. No, ma'am.

22 Q. Have you ever been asked to help sell products or  
23 services for the company?

24 A. About 30 years ago when I was in line and station we  
25 sold extensions.

1 Q. More recently than that, say in the late '80s, have  
2 you ever helped sell?

3 A. (Shakes head in the negative) No--

4 Q. That's a "no"?

5 A. -- ma'am.

6 Q. Do you know of anyone who has put false information of  
7 any kind on a trouble record?

8 A. No, ma'am.

9 MS. RICHARDSON: Okay. Mr. Bates, I think that's all  
10 the questions I have. I thank you for being here. I  
11 appreciate it.

12 I don't know if--

13 MR. GREER: No questions.

14 MS. RICHARDSON: Okay. Mr. Bates, we'll let you go  
15 back to fixing cables.

16 (Thereupon the deposition was concluded at 2:10 p.m.)

17 \_\_\_\_\_  
18 (Date)

\_\_\_\_\_  
Ronald Bates

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

21 \_\_\_\_\_  
22 Notary Public  
23 State of Florida At Large

24 My Notary Commission Expires:  
25

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

3 I, JOHN J. BLUE, Registered Professional  
 Reporter, Certified Shorthand Reporter and Notary Public  
 4 in and for the State of Florida at Large,

5 DO HEREBY CERTIFY that the deposition of RONALD  
 BATES, a witness called by the Citizens of the State of  
 6 Florida in the above-captioned matter, Docket No.  
 910163-TL, was heard at the time and place herein stated;  
 7 that the witness was by me first sworn to tell the truth;  
 it is further

8 CERTIFIED I reported in shorthand the said  
 9 deposition; that the same has been transcribed under my  
 direct supervision, and that this transcript, consisting  
 10 of 27 pages, constitutes a true and accurate  
 transcription of my notes of said deposition; it is  
 11 further

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

14 IN WITNESS WHEREOF, I have hereunto set my hand  
 15 at Miami, Dade County, Florida, this 17th day of August,  
 1993.

16  
 17  
 18   
 JOHN J. BLUE

19 Registered Professional Reporter  
 Certified Shorthand Reporter and Notary Public  
 20 In and for the State of Florida At Large  
 1014 Ingraham Building  
 21 25 Southeast 2nd Avenue  
 Miami, Florida 33131  
 22 (305) 371-6228

23  
 24 My Notary Commission Expires:  
 December 21, 1993  
 25

1           REPORTERS DEPOSITION CERTIFICATE WITH ACKNOWLEDGMENT

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

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

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

15           Dated this 17th day of August, 1993.

16                                   
 17                                 JOHN J. BLUE

18                                 Registered Professional Reporter

19           STATE OF FLORIDA  
 20           COUNTY OF DADE

21           The foregoing certificate was acknowledged  
 22           before me this 17th day of August, 1993 by  
 23           JOHN J. BLUE, who is personally known to me.

24                                   
 25                                 Amar Kredi  
 Notary Public - State of Florida  
 My Commission No. CC194782  
 Expires: May 16, 1996

