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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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. )

DOCKET NO. 910163-TL

920260 - 7

COPY

DEPOSITION OF: GEORGINA MAESTRI  
TAKEN AT THE INSTANCE OF: Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel  
DATE: Tuesday, July 28, 1992  
TIME: Commenced at 3:10 p.m. Concluded at 3:55 p.m.  
PLACE: 666 N.W. 79th Avenue Room 642 Miami, Florida  
REPORTED BY: JANE FAUROT Notary Public in and for the State of Florida at Large

ACCURATE STENOGRAPHY REPORTERS, INC.  
100 SALEM COURT  
TALLAHASSEE, FLORIDA 32301  
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APPEARANCES:

REPRESENTING THE SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:

ROBERT G. BEATTY, ESQUIRE  
Southern Bell Telephone and Telegraph Company  
Museum Tower Building  
Suite 1910, 150 West Flagler Street  
Miami, Florida 33130

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

SUE RICHARDSON, ESQUIRE  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, Florida 32399-1400

REPRESENTING THE FLORIDA PUBLIC SERVICE COMMISSION:

JEAN WILSON, ESQUIRE and  
STAN GREER, Class B Practitioner  
FPSC Division of Legal Services  
Florida Public Service Commission  
101 East Gaines Street  
Tallahassee, Florida 32399-0863

REPRESENTING GEORGINA MAESTRI:

ARTURO ALVAREZ, ESQUIRE  
Alvarez & Gamba, P. A.  
2121 Southwest 3rd Avenue  
Suite 400  
Miami, Florida 33129

ALSO PRESENT:

WALTER BAER, Office of Public Counsel.  
CARL VINSON, FPSC Division of Communications.

\* \* \* \* \*

I N D E X

WITNESS:

PAGE NO.

GEORGINA MAESTRI

Direct Examination by Ms. Richardson  
Cross Examination by Mr. Greer

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CERTIFICATE OF REPORTER

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The following deposition of GEORGINA MAESTRI was taken on oral examination, pursuant to notice, for purposes of discovery, for use in evidence, and for such other uses and purposes as may be permitted by the Florida Rules of Civil Procedure and other applicable law. Reading and signing of said deposition by the witness is not waived. All objections, except as to the form of the question, are reserved until final hearing in this cause; and notice of filing is waived.

\* \* \* \* \*

Thereupon,

GEORGINA MAESTRI

was called as a witness, having been first duly sworn, was examined and testified as follows:

MR. BEATTY: My name is Robert Beatty, and I represent Southern Bell. Another gentleman may come in later. His name is Phillip Carver, which I believe you also met. He also represents Southern Bell.

There are a number of stipulations that we have agreed to up to this point. One that the deposition is taken pursuant to proper notice initiated by Public Counsel, number one; number two, that the witness will agree or not agree, as the case may be, about going off the record. And, of course, her counsel will either

1 concur or not, as the case may be. That with regard to  
2 objections, all objections are saved, except as to  
3 form, and the Company does not waive reading and/or  
4 signing of the deposition.

5 Additionally, there was an investigation, as I'm  
6 sure you're well aware, conducted internally by  
7 Southern Bell with regard to the issues that will be  
8 discussed here today. That investigation is one that  
9 is protected by the attorney/client privilege and the  
10 attorney work product privilege. And I will appreciate  
11 it if you respect the privileges with regard to that  
12 investigation by not disclosing any of the substance or  
13 your involvement, et cetera, with regard to that  
14 investigation. Okay?

15 MS. RICHARDSON: However, if you have any  
16 information outside of that investigation, then we ask  
17 that you answer the questions fully and honestly. Is  
18 that acceptable?

19 THE WITNESS: (Indicating yes.)

20 MS. RICHARDSON: Mr. Alvarez, would you like to  
21 put in an appearance for the record?

22 MR. ALVAREZ: Arturo Alvarez. I'm appearing on  
23 behalf of Georgina Maestri.

24 MS. RICHARDSON: Okay. I have called you

25 DIRECT EXAMINATION

1 BY MS. RICHARDSON:

2 Q Would you please, for the record, give the court  
3 reporter your name and spell both your first name and your  
4 last name?

5 A Georgina Maestri, spelled G-E-O-R-G-I-N-A,  
6 M-A-E-S-T-R-I.

7 Q And your address, please?

8 A

9 Q Okay. And Ms. Maestri, what is your present  
10 position with the Company?

11 A I'm a maintenance administrator.

12 Q For which IMC?

13 A Central Dade.

14 Q Central Dade.

15 A Yes.

16 Q And who is your immediate supervisor?

17 A Margaret Kearse.

18 Q K-E-A-R-S-E?

19 A Correct.

20 Q And who is her supervisor?

21 A Mr. Rick Hagen.

22 Q H-A-G-E-N?

23 A Right.

24 Q And what is your pay grade level? Do you know  
25 your pay grade level?

1 A Well, I can't remember exactly.

2 MR. BEATTY: The reference, ma'am, is to whether  
3 or not you are management or craft.

4 THE WITNESS: Oh, craft, yes.

5 BY MS. RICHARDSON:

6 Q You are a craft person?

7 A Yes, craft.

8 Q Okay. And as a maintenance administrator in the  
9 IMC, what are your duties and responsibilities?

10 A My responsibilities? To test the lines and clear  
11 troubles.

12 Q Are these customer troubles?

13 A Customer troubles, right, reports.

14 Q Is that residence?

15 A Residence, yes, and it's business, too.

16 Q So, you handle both?

17 A Uh-huh.

18 Q Okay. Are you responsible, then, for opening  
19 trouble reports when a customer calls in, to open it within  
20 the computer, within LMOS?

21 A No.

22 Q So, how does it come to you, then?

23 A Through the CRSAB it comes to us, to the  
24 maintenance center.

25 Q Okay. So, someone else opens up the trouble

1 report and then it comes to you via the computer?

2 A Exactly.

3 Q And it show up on your screen?

4 A Right.

5 Q Do you handle customer-direct reports and  
6 employee-originated reports?

7 A No, the employee is CD, the customer reports.

8 Q The CD reports is what you're saying?

9 A Yes, the CDs.

10 Q All right. Is part of your responsibility to  
11 clear and close those reports?

12 A Yes.

13 Q Okay. Are you familiar with disposition codes?

14 A Yes.

15 Q Do you use disposition codes in your position?

16 A Yes.

17 Q Okay. What does a disposition code do?

18 A It tells you what happened. The reason why you're  
19 closing the trouble.

20 Q Okay. And can you give me an example of why a  
21 trouble might be closed? I mean, one of the disposition  
22 codes might be for what?

23 A Okay. If it's, you now, okay, the line is fine.

24 Q If it tests okay?

25 A Right. It tests okay, for example, the code is



1 0700.

2 Q Okay. Are there inside wire disposition codes?  
3 The trouble is inside the customer's wire, premises, are  
4 there codes for that?

5 A No, those are closed by the technician.

6 Q Okay. So, you don't handle those codes?

7 A No. If it's dispatched out, no, the technicians,  
8 the STs are the ones that close them with, you know, those  
9 three codes.

10 Q Then I guess I need further clarification --

11 A Okay.

12 Q -- from you on what types of troubles you,  
13 personally, are responsible for closing down?

14 A Okay. The ones that come in, and then after I  
15 test it, if there's no trouble, ground or anything, and the  
16 customer, you know, after I talk to the customer, I close  
17 it. If it doesn't need to be dispatched, I close it out.

18 Q Okay. So, you receive the report from the CRSAB,  
19 and it comes to you. And you analyze the trouble report and  
20 look at it. And you test it, you test the report?

21 A Uh-huh.

22 Q And then if it's determined that someone has to  
23 actually go outside to fix it the report, then it's  
24 dispatched, and you don't ever have anything else to do with  
25 it beyond that point?

- 1           A     Uh-huh.
- 2           Q     Okay. So any report that is not dispatched is one  
3 that you would handle and close?
- 4           A     Uh-huh.
- 5           Q     Okay. Would you handle at all cable reports,  
6 then, cable trouble type reports?
- 7           A     No, the cables -- no. It goes outside.
- 8           Q     All right. Are you responsible for dispatching  
9 reports at all?
- 10          A     Yes. After I test them, if they need dispatch, I  
11 put it -- send it to the pool and put it for dispatch.
- 12          Q     Okay. Are you familiar with the autoscreener  
13 rules, Ms. Maestri?
- 14          A     Autoscreener?
- 15          Q     Uh-huh.
- 16          A     Those are dispatched directly outside.
- 17          Q     Okay. So, you would --
- 18          A     We don't see them.
- 19          Q     What about handling codes?
- 20          A     I'm sorry?
- 21          Q     A handling code, do you see those on your screen?  
22 Do they come up on reports? Do you know what a handling  
23 code is?
- 24          A     No. Will you repeat that?
- 25          Q     Okay. An example of a handling code, from my

1 understanding from reading Company documents, an example of  
2 a handling code that might appear on a screen would be a  
3 cable cut, a third-party reported, buried service wire,  
4 something that would go through autoscreener and  
5 autoscreener would produce a little narrative on the screen  
6 that says, "We don't have a rule to deal with this." And  
7 then it would show up. Is that familiar to you?

8 A Yes, we get it. It's a manual -- to be manually  
9 screened, yes.

10 Q Okay. And when you get those, then, you do  
11 further testing?

12 A Right. Right, with the VER codes.

13 Q All right. With the VER codes.

14 A Uh-huh.

15 Q All right. When you find the VER code.

16 A Uh-huh.

17 Q And the screening does the VER code, or do you  
18 personally find the VER code that matches what a customer  
19 tells you?

20 A Right. After, you know, I test it. I retest it.  
21 When it comes manually, I retest it. And then I talk to the  
22 customer, if I can reach him first.

23 Q Okay. And then you type in the VER code?

24 A Uh-huh.

25 Q Okay. And do you also type in the type code at

1 the same time?

2 A Yes. That comes in, right. After I test it, you  
3 mean?

4 Q Uh-huh. After you test it, yes.

5 A Yes.

6 Q Okay. How long have you held this particular  
7 position?

8 A I think in '83 or '84. I'm not sure. I can't  
9 remember back there. '83 or '84.

10 Q In the same center?

11 A Yes. Well, I came from Metro. I started in Metro  
12 and came to -- when we merged, I went to Central Dade.

13 Q Central Dade. Okay. And do you know about when  
14 that would be, what year, that you moved from Metro to  
15 Central Dade?

16 A I can't remember if it was '86, '85; '86, around  
17 there.

18 Q Sometime?

19 A Sometime around there. I can't remember.

20 Q And what did you do before the maintenance  
21 administrator position? What was your position with the  
22 Company?

23 A I was an assignment clerk.

24 Q An assignment clerk. And what does an assignment  
25 clerk do?

1           A     They keep the records of the cables, you know:  
2     But I have that title in working on those special circuits  
3     in another department, so I didn't have to do with the  
4     cables themselves.

5           Q     Okay. So, you were --

6           A     It was a function.

7           Q     So, you only worked with special service, and you  
8     did not work with cable. Is that what you're telling me?

9           A     Right.

10          Q     Okay. And when did you begin your employment with  
11     Southern Bell?

12          A     1969, March, 1969.

13          Q     And what was your entry level position?

14          A     Operator.

15          Q     Is that just directory assistance operator?

16          A     No, no. I was a national, you know, local  
17     operator, long distance. And then I became an overseas  
18     operator. I was an operator for awhile.

19          Q     When you clear the reports that are not dispatched  
20     and you close the reports that are not dispatched, the ones  
21     that you're responsible for --

22          A     Right.

23          Q     -- what kind of problem on that line would be a  
24     problem that would stay with you and not be dispatched, one  
25     that would be your responsibility to close and not dispatch

1 out? Can you give me an example of some types of problems  
2 that you would handle?

3 A Yes. If the problem is inside the office.

4 Q Like a central office failure?

5 A Like a central office problem, I refer it to the  
6 central office until it's clear, and then I close it. If it  
7 tests okay, and I talk to the customer, and everything is  
8 okay, then I close it. We don't need to dispatch.

9 Q Do you know of anyone who has taken central office  
10 failures and closed them as out-of-service in order to meet  
11 the 95 percent repair index base?

12 A No. No.

13 Q Have you ever done that?

14 A No.

15 Q Let me interject here, because I did not do this  
16 at the beginning and I intended to. When I ask "Do you  
17 know," I mean do you have any personal, direct knowledge, as  
18 well as have you heard any rumors or read anything or know  
19 from any other source. And that's what I mean by "Do you  
20 know?" Okay. Is that acceptable for you?

21 A Uh-huh.

22 Q And pretty much the same thing with, "I don't  
23 remember or "I can't recall." If we can agree that "I can't  
24 remember," or "I don't recall," means you have an absolute  
25 blank, that there aren't any niggling thoughts out here

1 that, you know, maybe there's something. If there is, then  
2 tell me, "Well, there's something out here, but I'm not real  
3 sure about it. It's kind of fuzzy," Okay? But, "I can't  
4 remember," means an absolute blank. Is that acceptable for  
5 you? Do you understand that?

6 A Yes.

7 Q Can we agree to those terms?

8 A Uh-huh.

9 Q Okay. Have you been disciplined recently,  
10 Ms. Maestri?

11 A No.

12 Q Do you know of anyone who has been disciplined  
13 recently?

14 A No.

15 Q In your position as an MA, and handling trouble  
16 reports in the process, do you know of anyone who has  
17 stasured an affecting service report as out-of-service in  
18 order to meet the 95 percent repair index base?

19 A No.

20 Q Do you know of anyone who has stasured an  
21 affecting service report as out-of-service in order to meet  
22 the 95 percent repair index base?

23 A No.

24 Q To build the base?

25 A No.

1 Q Do you know of anyone who has taken an affecting  
2 service status that was about to go out over 24 hours and  
3 left it affecting service on closeout instead of closing it  
4 out-of-service when it was really out-of-service?

5 A No.

6 Q Have you ever done that yourself?

7 A Huh-uh.

8 Q Do you know what a no access code is?

9 A Yes.

10 Q Do you handle those or input no access codes in  
11 your position?

12 A No.

13 Q And that's because it requires a dispatch out?

14 A Exactly.

15 Q Do you know of anyone who has used a no access  
16 code improperly to avoid a report going over 24 hours?

17 A No.

18 Q Do you know if the no access code prevents that  
19 report from being counted in the 95 percent repair index  
20 base?

21 A No.

22 Q You don't know whether or not it does?

23 A Huh-uh.

24 Q Do you know whether or not it stops the clock on  
25 the 24-hour count?



1 A I don't know.

2 Q Do you know what the carryover no or CON  
3 intermediate status code is?

4 A Say that again.

5 Q The carryover no or the C-O-N, the CON?

6 A No.

7 Q Intermediate status code, do you know that one?

8 A Yes, I've heard C-O-N, yes. But it's not used for  
9 anything. We're not using it.

10 Q You, personally, didn't use it?

11 A No.

12 Q Okay. Do you know of other people who do use that  
13 code?

14 A Huh-uh. We're not using that. We don't use that  
15 code.

16 Q Now, you mean?

17 A No.

18 Q You have never used that code?

19 A Huh-uh. I don't recall, no.

20 Q Okay. Do you know of anyone who has backed up the  
21 time on a trouble report?

22 A What do you mean "backed up?"

23 Q What do I mean by backing up the time?

24 A Yes, backing up, uh-huh.

25 Q Okay. Let's say the trouble was cleared at 1:00,

1 and it went over 24 hours at noon. And the person showed  
2 the clearing time as 11:30 in the morning. Do you know of  
3 anyone who may have done something similar to that?

4 A No.

5 Q Have you ever heard the words "backing up time?"

6 A Well, when it's clear, let's say -- if the  
7 technician, let's say, he goes out and he cleared it this  
8 afternoon, and he don't call in until the morning or maybe  
9 he's out, you know, he went to lunch. Then he says, "No, it  
10 was cleared," it's giving the service to the customer, you  
11 know, the time he restored the service, that's the only  
12 time.

13 Q Okay. Do you know of anyone who has used a dummy  
14 employee code in statusing a customer trouble report?

15 A No, I don't know.

16 Q A phony code?

17 A (Witness indicating no.)

18 Q Have you ever done so yourself?

19 A No.

20 Q Do you know of anyone who has ever used a  
21 unassigned code for statusing a customer trouble report?

22 A (Witness indicating no.)

23 Q Have you ever done so yourself?

24 A No, ma'am.

25 Q Do you know of anyone who has ever used somebody

1 else's employee code to status a trouble report?

2 A Huh-uh. I haven't heard about it.

3 Q Have you ever done so yourself?

4 A No, ma'am.

5 Q All right. Do you know of any maintenance  
6 administrators who might have been told to call a manager to  
7 get a disposition and cause code before they closed out a  
8 report?

9 A No. You have your list of -- you know, you do it.  
10 You know, you determined what the problem is.

11 Q Have you ever had to ask a manager, yourself, for  
12 a disposition or cause code before you cleared or closed a  
13 report?

14 A No, not really.

15 Q Do you know of anybody who has ever falsified a  
16 customer trouble report?

17 A Huh-uh.

18 Q Have you ever done so yourself?

19 A No, ma'am.

20 Q Do you know of anyone who has ever improperly  
21 coded a customer trouble report?

22 A (Witness indicating no.)

23 Q Have you ever done so yourself?

24 A No.

25 Q Do you know of anyone who has ever closed --

1 cleared and closed a trouble report that was in danger of  
2 going out-of-service over 24 hours and then reopening  
3 another report in order to clear and close the problem?

4 A No.

5 Q Have you ever done so yourself?

6 A (Witness indicating no.)

7 Q Do you know of anyone who has ever extended a  
8 commitment time on a trouble report without contacting the  
9 customer?

10 A You mean they changed the commitment?

11 Q Without contacting the customer.

12 A No. You have to get the customer's approval to do  
13 that. You know, if somebody says, "I'm not going to be  
14 home," or you know, "I'll be ready," you know, the next day  
15 or three or four hours later, whatever time, then you do it,  
16 but no.

17 Q Okay. And you have never done that yourself?  
18 You've never changed a commitment time without talking to a  
19 customer?

20 A No.

21 Q Do you know of anyone who has taken out-of-service  
22 reports and closed all of them out to test okay without --  
23 in order to build the base of out-of-service reports to meet  
24 the 95 percent index?

25 A Huh-uh.

- 1 Q Have you ever done so yourself?
- 2 A No.
- 3 Q Do you know of any disposition codes that can be  
4 used to exclude a trouble report from the 95 percent index,  
5 from being counted in that?
- 6 A What do you mean, exclude troubles?
- 7 Q Yes, it wouldn't be counted as being  
8 out-of-service within that 95 percent pool. For example,  
9 inside wire codes, do you know if inside wire disposition  
10 codes are counted within the out-of-service index base?
- 11 A No.
- 12 Q You don't know?
- 13 A I don't know.
- 14 Q You don't know. What about cause codes, like  
15 lightning or flood, do you know whether or not they're  
16 counted in the out-of-service base or if that lightning code  
17 would take it outside of the base, the out-of-service  
18 status?
- 19 A No, huh-uh. I don't know.
- 20 Q You have no idea?
- 21 A (Witness indicating no.)
- 22 Q Okay. Are you aware of the rule that the Company  
23 is to clear an out-of-service trouble within 24 hours?
- 24 A Yes.
- 25 Q Are you aware that the Company must do that within

1 95 percent, for 95 percent of the out-of-service troubles?

2 A Yes.

3 Q Okay. Do you know of anyone who has missed that  
4 95 percent, or have you been involved in IMCs that have  
5 missed that 95 percent index at any time?

6 A No. I don't know about the index. You know,  
7 that's --

8 Q You know that the Company has to meet the 95  
9 percent?

10 A Uh-huh. Yes, I know that.

11 Q You know that?

12 A Yes.

13 Q As a matter of fact, it's on your personnel  
14 evaluation as one of your objectives, one of your  
15 commitments that you have to make?

16 MR. BEATTY: I want to object to the form of the  
17 question. It's leading.

18 THE WITNESS: Yes.

19 MR. BEATTY: I hesitate to make that objection,  
20 but I think in the current context it's particularly  
21 important to me.

22 MS. RICHARDSON: I'm not objecting. I'm just so  
23 tired, I've lost my place to be honest. So, I'm  
24 starting again.

25 MR. BEATTY: Well, then, you should thank me.

1 MS. RICHARDSON: No, you should thank yourself.  
2 But don't let that encourage you. I'll start writing  
3 everything down.

4 MR. BEATTY: I need no encouragement, as you well  
5 know.

6 MS. RICHARDSON: As I well know, you're right.

7 BY MS. RICHARDSON:

8 Q So, you are aware of that, of the 95 percent  
9 index, and the importance to the Company of meeting that  
10 particular criteria?

11 A Yes.

12 Q Okay. Do you know of any means, then, of keeping  
13 track of where the Company is with that 95 percent  
14 objective? Whether or not they're getting close to meeting  
15 it or close to missing it, anyway, tracking reports?

16 A No, I don't -- you know, I don't get that.

17 Q You don't know about any of that?

18 A No. I don't get that at all.

19 Q Okay. Have any of your supervisors ever talked to  
20 you about meeting that 95 percent index for out-of-service?

21 A No.

22 Q Have you ever seen any memos or any documents  
23 about meeting that 95 percent index for out-of-service?

24 A No. I figured we did good or we did, you know --

25 Q Did good. Did good how? I mean, just in --

1 generally, you're a great person; you're a good employee or

2 --

3 A No, I get my evaluation, you know, what I do  
4 personally, but I don't know about the -- you mean the  
5 index? Is that what you're talking about?

6 Q Uh-huh.

7 A Huh-uh.

8 Q Okay. Is a customer given a commitment time for  
9 when his trouble will be repaired? Do you give a customer a  
10 commitment time for when the Company is going to have his  
11 trouble restored?

12 A No, it comes from the -- on the trouble report it  
13 says the commitment time when I get that.

14 Q And do you tell a customer that?

15 A No. It's already -- CRSAB is the one that gives  
16 them a commitment time. We don't.

17 Q Do you know what happens if the Company misses  
18 that commitment time, if they don't get the service restored  
19 by the commitment time?

20 A I'm sorry.

21 Q Do you know what happens if the Company misses  
22 that commitment time? Example, if the Company tells the  
23 customer that your commitment is shown on the screen. We  
24 commit to have your service restored by 10:00 this morning?

25 A Right.



1 Q Okay. It's 11:00, the Company hasn't restored  
2 service. Do you now what happens?

3 A No. We missed the commitment.

4 Q Okay. Does --

5 A We're supposed to call the customer before to let  
6 him know we're not going to meet the commitment. If we  
7 missed it; we missed it.

8 Q Okay. And when you call the customer, what do you  
9 tell the customer?

10 A That we missed the commitment, and we're going to  
11 make it -- you know, we won't be able to make it at this  
12 time, and, you know, we'll be there later that day or  
13 tomorrow morning or whatever.

14 Q Okay.

15 A We advise the customer.

16 Q Okay.

17 A That we're going to make it.

18 Q Do you exclude reports at anytime?

19 A Sometimes, yes.

20 Q For what reason do you exclude a report?

21 A Well, let's say if a customer calls for trim the  
22 trees or -- you know, our policy is not to do it. So, we  
23 explain to the customer, and we exclude those troubles.

24 Q Do you exclude a subsequent report?

25 A A subsequent report?

1 Q Uh-huh.

2 A Well, it depends on what, you know --

3 Q Well, then, tell me when you would exclude a  
4 customer -- a subsequent report.

5 A A subsequent report? No, I don't. Unless -- no.  
6 You don't exclude a subsequent report. If a customer calls  
7 and says it's okay now?

8 Q Uh-huh.

9 A You don't exclude it.

10 Q What do you do?

11 A If it's found okay with the customer.

12 Q So, you close it --

13 A Close it within an 07 code, 0700 code, because  
14 it's okay, and the customer is saying it's fine. And, you  
15 know, you don't need to go out or whatever, you know, if the  
16 trouble was pending to dispatch or pending to the screen or  
17 something. If it's okay; it's okay. So, you don't exclude  
18 it.

19 Q Okay. And an 0700 code is a test okay?

20 A Found okay, right, test okay.

21 Q And is found okay a 900 code?

22 A Yes, but that's for the outside guys.

23 Q That's for the outside guys. So, you would only  
24 use the 0700 code?

25 A Correct.

1 Q If it's test okay and it's over 24 hours, would  
2 the customer get a rebate?

3 A If it's over 24 hours? Yes, I think so.

4 Q Even though it has been tested okay after 24  
5 hours?

6 A If it was out-of-service, yes.

7 Q Okay. Would you ever use or exclude -- let me  
8 rephrase. Would you ever exclude an out-of-service report?

9 A Not to my knowledge, no.

10 Q You would never --

11 A Not that I recall. Not that I recall, no.

12 Q Okay. Do you know of anyone who has ever excluded  
13 an out-of-service report?

14 A No.

15 Q And you've never done so?

16 A No, I don't recall, no.

17 Q Ms. Maestri, do you have any information related  
18 to the Company's internal investigation?

19 A Any information?

20 Q Related to the Company's internal investigation?

21 A No.

22 MS. RICHARDSON: Ms. Maestri, I want to thank you  
23 for appearing here today and for responding. I have no  
24 further questions for you, but some of the Public  
25 Service Commission staff may. Did you meet the staff?

1 THE WITNESS: No.

2 MS. RICHARDSON: This is Ms. Jean Wilson, who is  
3 an attorney for the Commission. Mr. Carl Vinson and  
4 Stan Greer are on the staff of the Commission, and they  
5 may have some questions for you.

6 THE WITNESS: Okay.

7 CROSS EXAMINATION

8 BY MR. GREER:

9 Q Ms. Maestri, I have one question. Has anybody  
10 ever asked you to falsify any trouble reports?

11 A No, sir.

12 MR. GREER: That's it.

13 MS. RICHARDSON: Thank you.

14 THE WITNESS: You're welcome.

15 (The deposition concluded at 3:55 p.m.)  
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CERTIFICATE OF ADMINISTERING OATH

STATE OF FLORIDA:  
COUNTY OF LEON:

I, JANE FAUROT, Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that on the date and place indicated on the title page of this transcript, an oath was duly administered by me to the designated witness(s) before testimony was taken.

DATED THIS 27th day of September, 1993.



JANE FAUROT  
MY COMMISSION # CC295576 EXPIRES  
July 16, 1997  
BONDED THRU TROY FAIR INSURANCE, INC.

*Jane Faurot*

JANE FAUROT  
100 Salem Court  
Tallahassee, Florida 32301  
(904) 878-2221

MY COMMISSION EXPIRES: 7/16/97

CERTIFICATE OF REPORTER

STATE OF FLORIDA )  
COUNTY OF LEON )

I, JANE FAUROT, Court Reporter, do hereby certify that the foregoing proceedings was taken before me at the time and place therein designated; that my shorthand notes were thereafter translated under my supervision; and the foregoing pages numbered 1 through 28 are a true and correct record of the proceedings.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

DATED THIS 27th day of September 1993.

*Jane Faurot*

JANE FAUROT  
100 Salem Court  
Tallahassee, Florida 32301  
(904) 878-2221

SWORN TO AND SUBSCRIBED TO BEFORE ME THIS 28 day of September, 1993, IN THE CITY OF TALLAHASSEE, COUNTY OF LEON,

1 STATE OF FLORIDA, BY THE ABOVE PERSON WHO IS PERSONALLY  
2 KNOWN BY ME.

3 *Melanie Y. Bradford*  
4 NOTARY PUBLIC  
5 STATE OF FLORIDA

