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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-TL

DEPOSITION OF: GEOFFREY LIEBRICH
TAKEN AT THE INSTANCE OF: Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel
DATE: Wednesday, July 29, 1992
TIME: Commenced at 1:45 p.m. Concluded at 2:30 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

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100 SALEM COURT
TALLAHASSEE, FLORIDA 32301
(904) 878-2221

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1 APPEARANCES:

2 REPRESENTING THE SOUTHERN BELL TELEPHONE AND
3 TELEGRAPH COMPANY:4 HARRIS R. ANTHONY, ESQUIRE
5 BellSouth Telecommunications, Inc.
6 d/b/a Southern Bell Telephone &
7 Telegraph Company
8 c/o Marshall M. Criser, III
9 150 South Monroe Street, Suite 400
10 Tallahassee, Florida 32301

11 REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

12 SUE RICHARDSON, ESQUIRE
13 Office of Public Counsel
14 c/o The Florida Legislature
15 111 West Madison Street
16 Room 812
17 Tallahassee, Florida 32399-140018 REPRESENTING THE FLORIDA PUBLIC SERVICE
19 COMMISSION:20 JEAN WILSON, ESQUIRE and
21 STAN GREER, Class B Practitioner
22 FPSC Division of Legal Services
23 Florida Public Service Commission
24 101 East Gaines Street
25 Tallahassee, Florida 32399-0863

26 REPRESENTING MR. GEOFFREY LIEBRICH:

27 JORGE L. PEREZ-GURRI, ESQUIRE
28 The Plumer building
29 Suite 12
30 5915 Ponce De Leon Boulevard
31 Coral Gbles, Florida 33148

32 ALSO PRESENT:

33 WALTER BAER, Office of Public Counsel.

34 CARL VINSON, FPSC Division of Communications.

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WITNESS:

PAGE NO.

GEOFFREY LIEBRICH

Direct Examination by Ms. Richardson

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CERTIFICATE OF REPORTER

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S T I P U L A T I O N S

The following deposition of GEOFFREY LIEBRICH 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,

GEOFFREY LIEBRICH

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

MS. RICHARDSON: And would you like to make an appearance for the record?

MR. PEREZ-GURRI: Jorge Perez-Gurri, on behalf of Mr. Liebrich.

MR. ANTHONY: And we will use the same stipulations that we had used Monday?

MR. PEREZ-GURRI: Understood.

MR. ANTHONY: And, Mr. Liebrich, there is just one other thing that I wanted to discuss with you before Ms. Richardson starts asking you questions. And that

1 is the fact that these depositions that we have been
2 having today, including yours, are all part of the
3 Florida Public Service Commission's investigation into
4 Southern Bell's trouble reporting practices.

5 The Company conducted its own investigation of
6 those practices and that was a privileged
7 investigation, because it was conducted by the
8 attorneys in anticipation of litigation. And
9 privileged means that it can't be discovered by any
10 third parties, the Company's information, and we don't
11 have to disclose it to anybody. So, if anybody asks
12 you a question about your participation in that
13 investigation, information you may have gained,
14 information you may have given, then I'm going to
15 interrupt and ask you not to answer those questions
16 because it is privileged. To the extent that you can
17 answer the questions from any knowledge you have other
18 than from the investigation itself, of course, you're
19 free to answer, and you should do so fully, completely,
20 and honestly. Okay?

21 THE WITNESS: Okay.

22 MR. ANTHONY: Thank you.

23 MS. RICHARDSON: Did you have any statement you
24 wanted to make before we start, preliminarily?

25 MR. PEREZ-GURRI: No, not at this time.

1 MS. RICHARDSON: Okay. Then I have two
2 preliminary matters, too, and that is to make sure that
3 we are communicating and we understand certain general
4 terms. One of them is "I don't know" or if I ask you,
5 "Do you know," and you answer me "No," then that means
6 for our purposes of the deposition here that you have
7 no direct, personal knowledge of what happened; but
8 also that you haven't heard anything else by rumor or
9 read something or sort of general knowledge, secondary
10 knowledge out there. Is that acceptable for you?

11 THE WITNESS: I'm sorry. Do that again. I'm
12 caught up in these proceedings right here.

13 MS. RICHARDSON: That's fine. I'll be glad to go
14 over it again.

15 MR. PEREZ-GURRI: If she asks for your knowledge
16 of some things, and if you say "I don't know," why
17 don't you just qualify your answer and say if your
18 response, "I don't know," is within your personal
19 knowledge, because you have no knowledge, whatsoever,
20 hearsay or otherwise. That's what she wants to know.

21 THE WITNESS: I understand.

22 MS. RICHARDSON: All right. Thank you. And
23 that's pretty much the same thing for "I can't
24 remember." In other words, your mind is an absolute
25 blank. There is not any little niggling thought out

1 here that you have a vague recollection of something;
2 you have no recollection. Is that acceptable to you?

3 THE WITNESS: Yes.

4 DIRECT EXAMINATION

5 BY MS. RICHARDSON:

6 Q Okay. All right. With that out of the way, then,
7 if you would please state your name for the court reporter
8 and spell it for her to make sure we have it accurately?

9 A My name is Geoffrey, G-E-O-F-F-R-E-Y, Liebrich,
10 L-I-E-B, as in boy, R-I-C-H.

11 Q And your address, please?

12
13

14 Q Okay. And what is your present position, Mr.
15 Liebrich?

16 A I'm an assistant manager, Network.

17 Q And that is for all of Florida or South Florida
18 or --

19 A South Dade Division.

20 Q South Dade. Does that also encompass the Keys,
21 the South Dade Division?

22 A Yes, ma'am.

23 Q And how long have you held this position?

24 A Since 1979.

25 Q This very same position?

1 A No. As an assistant manager, I've been an
2 assistant manager since 1979.

3 Q Okay. And did you work with the Company before
4 that?

5 A Yes, I was a service technician.

6 Q All right. What types of work did you do as a
7 service technician?

8 A I installed phones, repaired them.

9 Q Residence and business?

10 A No, just residence.

11 Q Just residence. Okay. Who is your present
12 supervisor?

13 A Tom Dwyer. He is a manager. D-W-Y-E-R.

14 Q And who is his supervisor?

15 A Ted Rubin is the operations manager of South Dade.

16 Q All right. And what are your present duties?
17 What is the scope of your work; what exactly do you handle?

18 A Okay. I'm his administrative assistant right now,
19 and I handle all the administrative duties in South Dade,
20 basically.

21 Q Okay. For someone who is not connected with the
22 Company and has very little knowledge, really, of how the
23 Company operates, I'm not quite sure what types of things
24 you would do as an administrative assistant. Is this public
25 coin collection? Is it trouble repair work? Is it

1 supervising, generally, people, employee personnel type
2 work?

3 A Yes.

4 Q Do you see what I'm saying? If you can fill that
5 in a little bit more, I'd appreciate it.

6 A I don't have any technicians reporting to me. And
7 I'm Mr. Dwyer's -- like his assistant. And I handle any
8 miscellaneous work that occurs in the division. I handle
9 all the bond drives. I am -- that's interesting. I'm on
10 the phone all day, that is what I'm doing. I take care of
11 roadblocks that occur for all the 155 service technicians,
12 and they are endless. And I do capital tool inventory,
13 scheduling, vacations, on and on, I guess.

14 Q Okay. Roadblocks for service technicians, I'm not
15 quite sure -- you're not talking physical roadblocks in the
16 road?

17 A No. If the person has encountered a roadblock in
18 any job that he has out there, I will try to resolve the
19 problem for him, whether it be a frame delay, a service
20 order that it's written wrong; and there is problems with
21 the service order that he can't resolve himself, I will
22 escalate. And I will go through to another manager, and we
23 will resolve the problem more quickly than he could going
24 through a maintenance administrator and trying to resolve
25 the problem.

1 Q And when did you first begin your employment with
2 the Company?

3 A 1972.

4 Q That has been a long time. What was your entry
5 level position?

6 A Service technician.

7 Q Is your present position -- what pay grade is your
8 present position?

9 A Three.

10 Q Three. And what was the pay grade in your prior
11 position to this?

12 A Three.

13 Q Was this position a promotion for you?

14 A No. A service technician was an entry level. I
15 was a technician. Then I was promoted to management as a
16 Pay Grade 3.

17

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1 Q And that was a meeting between just the three of
2 you?

3 A Yes, ma'am.

4 Q And when did this take place?

5 A In March.

6 Q Of this year?

7 A Yes.

8 Q And what did they tell you?

9

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14 Q Okay. I would like for you to look at this and
15 see if you can identify it for me, if you would.

16 A Yes, that's mine.

17

18 A Yes, it does.

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1 MR. PEREZ-GURRI: If you have an opinion.

2 BY MS. RICHARDSON:

3 Q Do you have a opinion about the severity of the
4 discipline?

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A I know of one. I know of several, yes.

23

Q And can you tell me who they are, please?

24

A I only know of one person for sure, and I saw the
25 entry. Now, the other people that I heard are just I heard,

1 you know.

2 Q Okay.

3

4 (phonetic).

5 Q All right. And is that the person that you saw
6 the entry?

7 A Uh-huh.

8 Q You mean you saw their B form?

9 A I saw it, yes.

10

11 form?

12 A Yes.

13 Q All right. And then the other people that you
14 have just generally heard of, can you give me their names?

15

16 Q Have you worked with any of these people?

17 A Yes, I work with them now.

18 Q Are you surprised that they were disciplined?

19 A Yes, I am.

20 Q Do you know of any reason why they would have been
21 disciplined, and I'm speaking of firsthand, personal
22 knowledge at this point. Do you have any?

23 A No; no, ma'am.

24 Q Okay. Have you heard any rumors or hearsay as to
25 why they might have been disciplined?

1 A As a result of the investigations that occurred.

2

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11 A As far as what?

12

13 act?

14 A No, ma'am.

15 Q Let me try one more question with this.

16

17

18 A Do I have an opinion?

19 Q Uh-huh.

20

21

22

23 by a Company lawyer and Security.

24 Q Okay. Do you have any other information outside
25 of that interview that may be related to the investigation,

1 the Company's investigation?

2 MR. ANTHONY: To the extent that -- I'm going to
3 instruct you not to answer that question. I mean,
4 unless you can get more specific. That's so broad.

5 MS. RICHARDSON: All right.

6 BY MS. RICHARDSON:

7 Q Do you have any information at all about the
8 Company's investigation?

9 A No, I don't.

10 Q Do you know if anyone has ever accused you of
11 improperly handling customer trouble reports?

12 A I don't know that for a fact.

13 Q Okay. Do you know it generally, at all, in any
14 way?

15 A (Witness indicating no.)

16 Q Have you ever made accusations of other employees?

17 A No, I haven't. I have not.

18 Q Have you ever heard the term "backing up the time"
19 in relation to customer trouble reports?

20 A Could you be a little more specific in that, like
21 what?

22 Q Well, no specific incident, necessarily, but in
23 your work -- well, let me start over with are you familiar
24 with handling customer trouble reports when they are
25 out-of-service?

1 A Yes, I am.

2 Q All right. And that was part of your function as
3 a service technician was to handle customer trouble reports?

4 A No.

5 Q Part of your duties as a service technician dealt
6 with repairing troubles?

7 A Yes.

8 Q Okay. And in repairing those troubles, did you at
9 all have to make any records on that customer's line about
10 what kind of repair you did or --

11 A I was a service technician in 1978, '77.

12 Q Was there any computerized process for handling
13 that?

14 A Not to my knowledge. I mean, I was a service
15 technician in a truck out in the field. I don't have the
16 slightest idea.

17 Q Okay. So, the entire scope of your duties as an
18 ST would have been simply dealing with the hardware, the
19 problem in the hardware?

20 A Right, just going out and installing or repairing
21 the lines.

22 Q Okay. And when you fixed the problem, then what
23 did you do?

24 A I called into test board and closed out the
25 trouble.

1 Q All right. And when you called into the test
2 board, did you use codes to tell them what you had found or
3 did you just say, "It was a cut cable," or "It was a short
4 or a ground," and they applied the codes?

5 A Uh-huh.

6 Q Or how did that work?

7 A Well, I would call in and use the appropriate
8 disposition and cause codes.

9 Q Okay. So, you are familiar with disposition and
10 cause codes, then?

11 A Right.

12 Q All right. And are disposition and cause codes
13 used to close a trouble report?

14 A Yes, ma'am.

15 Q Okay. And you would determine which disposition
16 and cause code applied?

17 A Yes.

18 Q All right. Are you familiar with, or did they
19 have at that time a commitment time for the customer by when
20 that report would be cleared?

21 A Yes.

22 Q His trouble would be cleared and serviced?

23 A Yes.

24 Q Are you familiar with the rule that the Company
25 will repair out-of-service reports within 24 hours?

1 A Yes, I am.

2 Q Are you familiar with the Company objective of
3 doing so within 95 percent?

4 A Yes.

5 Q Okay. In terms of using the term "backing up the
6 time," and there are different times that things occur in a
7 report, the clearing time and the closing time, okay, are
8 you familiar with the use of the words or term "backing up
9 the time" at any point in a customer trouble report? Have
10 you ever heard of that?

11 A Yes, I have.

12 Q Okay. Would you give me the context in which you
13 have heard it?

14 A Okay. The times that I am aware of it is a
15 technician is dispatched out on a trouble, and he would
16 clear the trouble or he would provide service to the
17 customer at, let's say, at 11:00. And then he would spend
18 an hour policing the area, or he would reroute the drop, or
19 maybe he had to go inside to fix the jack for the customer.
20 And then he would, let's say, he is getting ready to close
21 the trouble out at 3:00 in the afternoon, and we would ask
22 the technician when did you restore the service to the
23 customer? And at that time he would say, "Yes, it was
24 11:00." And we would so note it and put it down as the
25 restored time, and then we would close the trouble out.

1 Q Okay. And you are speaking of we, but you were
2 the service tech calling in, and they would ask you when you
3 had actually restored the service, is that correct?

4 A I think you're confused about something. I'm a
5 manager.

6 Q Okay. This happened while you were a manager in
7 addition to --

8 A No. I was a service technician in 1977 and '78
9 time frame, and then I was promoted, and I have been a
10 manager since then.

11 Q Okay. So, you have managed these people?

12 A Yes.

13 Q All right. And that is your reference for backing
14 up the time, is as a manager?

15 A Yes, ma'am.

16 Q So, I'm confused, because I was relating it back
17 to 1979 when you were a service tech. And you have managed
18 what type of positions, MAs and STs?

19 A Yes, ma'am.

20 Q Is there any other position that you were
21 responsible for managing?

22 A No, just MAs and STs.

23 Q Okay. And is part of your responsibility to
24 manage the flow of trouble reports through that system?

25 A Yes.

1 Q Okay. Is that the only context in which you have
2 heard backing up the time?

3 A Yes, ma'am.

4 Q All right. Do you know of any procedure where
5 MAs, maintenance administrators, were required to call a
6 manager to get a disposition and cause code to close out a
7 trouble report?

8 A I'm not aware of that. For what reason? The MA
9 would have the technician on the line, and that technician
10 would provide him with that information, not me. I'm not
11 doing the work.

12 Q Okay. So, you have never heard of that being done
13 either?

14 A No.

15 Q And you haven't done that?

16 A No.

17 Q Okay. Are you familiar with the no access code,
18 the NAS code?

19 A Yes, ma'am.

20 Q When an NAS code is put into a customer trouble
21 report, what effect does that have on counting that report
22 in that out-of-service over 24 hours?

23 A I think it excludes it from the base.

24 Q Okay. Do you know of anyone who has used that no
25 access report to exclude an out-of-service over 24 hours

1 from the base?

2 A No, ma'am, I'm not aware of that.

3 Q Okay. Have you ever heard of that being done?

4 A No, ma'am, I've never heard that.

5 Q And have you ever done that?

6 A No, ma'am.

7 Q Okay. Do you know if anyone has ever used that no
8 access code without leaving a card or notifying the customer
9 at the premises?

10 A Well, I would hope that the ST went to the house.
11 I mean, I don't know what they did out in the field. But,
12 you know, the technician would call in, and he would give us
13 -- he would tell us it was a no access, and we would so note
14 it.

15 Q Do you know of any technician who has ever used
16 the no access code improperly?

17 A To what gain? I don't know. Why would they do
18 that?

19 MR. PEREZ-GURRI: Just answer the question.

20 THE WITNESS: No.

21 BY MS. RICHARDSON:

22 Q Okay. That's fine. Thank you. Do you know
23 whether or not a trouble report can be excluded from the
24 out-of-service base, whether or not there are exclusion
25 codes that can exclude a report from the base?

1 A Yes, there are, yes.

2 Q Okay. Would that be like lightning or flood or
3 some kind of problem, inside wire maybe?

4 A They are normally customer action codes, cause
5 codes, rather.

6 Q Okay. Do you know of anyone who has used those
7 codes to exclude an out-of-service-over-24-hour trouble from
8 the base?

9 A No.

10 Q Okay. Do you need further --

11 A Say that again, you know, because --

12 Q That's fine.

13 A For what, you know, I don't understand.

14 Q To keep it from -- to keep the 95 percent index at
15 95 percent, and to keep it from dropping lower?

16 A No, I'm not aware of anybody doing that.

17 Q Okay. Are you aware of anybody using those
18 exclude codes improperly for any reason?

19 A No, ma'am.

20 Q Okay. Have you ever heard of anyone doing that?

21 A I have never heard of anyone doing that.

22 Q And you have never done so yourself?

23 A No.

24 Q Are you familiar with the exclude function on a
25 final status screen on closing out a trouble report?

1 A No.

2 Q Have you seen the final status screen? Do you
3 even know what I'm talking about?

4 A I know what a final status screen is.

5 Q Okay. And --

6 A I don't know -- no, I don't know what you're
7 talking about.

8 Q Okay. Try to visualize it for me, since I don't
9 have one here to show you. If you will think back to final
10 status screens as you remember seeing them, and see if what
11 I'm about to say equates with your memory then. On a final
12 status screen there is a place for the date, isn't there?
13 When you're closing a report out on final status there is a
14 place to enter a date?

15 A The last time I was in the maintenance center it
16 was in '86. I left the maintenance center in June of '86.
17 And the only reason I know that is because I went to my
18 division office and inquired about it, is the only reason I
19 know the date.

20 Q You mean in preparation for this deposition?

21 A Exactly.

22 Q So, that statement indicates that you don't
23 remember final status screens at all?

24 A No, I couldn't swear to anything on a final SST
25 line, no.

1 Q Okay. Do you know if it's possible to change an
2 affecting service report to an out-of-service on closeout?

3 A We would ask the technician was the customer
4 out-of-service, yes or no? And at that time -- see, I'm not
5 the technician. I wasn't out there. The only thing we did
6 was dispatch on the trouble, and the technician would fix
7 it. And then we would ask, "Was the trouble out-of-service,
8 yes or no?" And then we would stroke it. If he said yes,
9 we would stroke it yes. And if he said no, we would leave
10 it alone or sometimes the trouble could have been statused
11 out-of-service up front. I don't know. You know, it was
12 the determination of the ST.

13 Q Okay. And then, also, in that process, then, is
14 it possible to exclude that report within that process?

15 A To exclude it?

16 Q Uh-huh.

17 MR. PEREZ-GURRI: I don't want you guessing. If
18 you understand the question, answer it, but I don't
19 want you speculating.

20 THE WITNESS: I don't know.

21 MS. RICHARDSON: You don't know.

22 BY MS. RICHARDSON:

23 Q Okay. Have you ever heard of anyone excluding an
24 out-of-service report to keep it from going over 24 hours
25 and then reopening that report in order to clear and close

1 it?

2 A No, I have not.

3 Q Do you know if anyone has ever done that?

4 A I don't know if anybody -- no.

5 Q And you have never done that?

6 A (Witness indicating no.)

7 Q Okay. Do you know what a commitment time is on
8 the report?

9 A Uh-huh.

10 Q And briefly is that the time when the customer is
11 told that his service will be repaired?

12 A Yes, ma'am.

13 Q Okay. Do you know of anyone who has used or
14 extended that commitment time without contacting the
15 customer?

16 A No. Why would you do that?

17 Q Okay. And you have never done that?

18 A No.

19 Q And you have never heard of anybody doing that?

20 A No, ma'am.

21 Q Do you know of anyone who has taken affecting
22 service reports and changed them to out-of-service reports
23 in order to build the base to meet the 95 percent index?

24 A No. No, I have never heard of that.

25 Q Okay. And you don't know anyone who has done

1 that?

2 A No.

3 Q And you have not done that?

4 A No.

5 Q Do you know of anyone who has built the
6 out-of-service base under any other means in order to meet
7 that repair index?

8 A I have never heard of that.

9 Q Okay. Do you know of anyone who has used the
10 carryover no or the CON code -- and I guess I had better ask
11 you, do you know what the CON code is?

12 A No, I don't.

13 Q Do you know what the carryover no is?

14 A No, I don't.

15 Q Do you know what a test okay is?

16 A Yes, I do.

17 Q All right. Do you know of anyone who has taken
18 test okay reports and closed them to out-of-service
19 improperly?

20 A No, I don't.

21 Q Have you ever heard of that being done?

22 A I have never heard.

23 Q And you have never done that?

24 A No, ma'am.

25 Q Okay. Do you know of anyone who has violated

1 Company procedures for handling customer trouble reports?

2 A I don't understand that.

3 Q Okay. Let me start again. Are you familiar with
4 the Company procedure for handling customer trouble reports?

5 A Yes, fairly well, yes.

6 Q Okay. Do you know of anyone who has violated
7 those procedures for handling customer trouble reports?

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

9 Q Have you ever heard of anybody who has done that?

10 A No, ma'am.

11 Q And have you ever done that yourself?

12 A No.

13 Q Mr. Liebrich, do you know if anyone, or of anyone,
14 who has used a dummy or a phony employee code in a customer
15 trouble repair report?

16 A No.

17 Q Have you ever heard of anybody doing that?

18 A No, ma'am.

19 Q And have you?

20 A No, ma'am.

21 Q Do you know of anybody who has ever used an
22 unassigned employee code number in a customer --

23 A No.

24 Q Have you ever heard of it being done?

25 A No, I have never heard of that.

1 Q And you have never done it?

2 A No, ma'am.

3 Q Do you know of any employee who has used someone

4 else's employee code number in a trouble report?

5 A No.

6 Q Have you ever heard of that being done?

7 A (Witness indicating no.)

8 Q And have you ever done that?

9 A No.

10 Q Okay. Do you know if anyone has used the

11 exclusion codes improperly in closing a customer trouble

12 report?

13 A No, I've never heard of anyone doing that.

14 Q And you have never done that?

15 A No, ma'am.

16 Q And you have never directed anyone to do that?

17 A No, ma'am.

18 Q Do you know of anybody who has falsified a

19 customer service report?

20 A No, I don't. I've never heard of anyone doing

21 that.

22 Q And you have never done that?

23 A No, ma'am.

24 Q Do you know of any other means of excluding, or do

25 you know of anyone who has used any other means of excluding

1 an out-of-service report so that it won't be counted against
2 the Company in the repair index?

3 A No.

4 Q Is the customer eligible or due a rebate if his
5 service is out over 24 hours?

6 A Yes, he is.

7 Q Do you know if there are certain types of problems
8 or disposition codes that would prevent that rebate or
9 certain reasons that the customer might not be eligible for
10 rebate?

11 A Yes. You just asked that question before.

12 Q Okay. I'm talking rebates now, not repair index?

13 A No, you asked about the disposition and cause
14 codes, and I told you about the different customer action
15 cause codes that would exclude it from the base. We call
16 them the QRA or the PSC out-of-service over 24 exclusion
17 or --

18 Q Okay. Then I'm not making myself clear. Let me
19 see if I can rephrase. I'm trying to separate the 95
20 percent repair index questions that I've asked you from
21 whether or not a customer is due a rebate for being
22 out-of-service. So, I'm making a distinction between the
23 repair index and whether he gets a rebate for it.

24 A Uh-huh.

25 Q Okay. So, this question is posed toward rebate

1 for the customer?

2 A Okay.

3 Q Okay.

4 A If they go out-of-service over 24, they get a
5 rebate. It's automatic.

6 Q What if the customer cuts his own line, would he
7 get a rebate?

8 A No.

9 Q What if it is inside wire problems, would he get a
10 rebate?

11 A I don't recall. I can't speculate on that. Like
12 I said, there are disposition and cause codes that exclude
13 it from the base. And I know that there are customer action
14 cause codes. Now, I can't -- I think the 1200 codes do
15 exclude it from the base, I don't know.

16 Q Okay. So, if I hear you correctly, in your mind,
17 the same disposition and cause codes that exclude a report
18 from the base also prevent a rebate. Is that what you're
19 saying?

20 A Uh-huh.

21 Q Okay. So, then, if someone had improperly used
22 one of these excludable disposition codes, then that would
23 have prevented a rebate to the customer in your mind?

24 A Yes.

25 MS. RICHARDSON: Mr. Liebrich, I hope that was

1 fairly painless for you. I appreciate your being here
2 today, and I appreciate your being so forthcoming with
3 your responses. I have no further questions, but, as I
4 said earlier, the PSC may have one or two for you.
5 Okay. Thank you.

6 THE WITNESS: Thank you.

7 MR. GREER: I don't think we have any.

8 MR. ANTHONY: I don't have any questions. Thank
9 you.

10 MR. PEREZ-GURRI: No questions.

11 (The deposition concluded at 2:30 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 FAIN 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 32 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 27th day of September, 1993, IN THE CITY OF TALLAHASSEE, COUNTY OF LEON,

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

Melanie Y. Bradford
NOTARY PUBLIC
STATE OF FLORIDA

