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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~~

COPY

DEPOSITION OF:	KATHLEEN A. REED
TAKEN AT THE INSTANCE OF:	Citizens of the State of Florida, by and through Jack Shreve, Office of Public Counsel
DATE:	Thursday, July 30, 1992
TIME:	Commenced at 9:50 a.m. Concluded at 10:30 a.m.
PLACE:	6451 North Federal Highway Room 1015A Fort Lauderdale, Florida
REPORTED BY:	JANE FAUROT Notary Public in and for the State of Florida at Large

ACCURATE STENOTYPE REPORTERS, INC.
100 SALEM COURT
TALLAHASSEE, FLORIDA 32301
(904) 878-2221

DOCUMENT NUMBER-DATE

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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:

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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
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25 Tallahassee, Florida 32399-0863

REPRESENTING KATHLEEN A. REED:

THERESE A. PIKE, ESQUIRE
Law Offices of Ted Crespi, P.A.
The 110 Tower, Suite 815
110 S. E. Sixth Street
Fort Lauderdale, Florida 33301

ALSO PRESENT:

WALTER BAER, Office of Public Counsel.

CARL VINSON, FPSC Division of Communications.

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I N D E X

<u>WITNESS:</u>	<u>PAGE NO.</u>
KATHLEEN A. REED	
Direct Examination by Ms. Richardson	7
Cross Examination by Mr. Greer	37
 CERTIFICATE OF REPORTER	 38

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

1
2 The following deposition of KATHLEEN A. REED was
3 taken on oral examination, pursuant to notice, for purposes
4 of discovery, for use in evidence, and for such other uses
5 and purposes as may be permitted by the Florida Rules of
6 Civil Procedure and other applicable law. Reading and
7 signing of said deposition by the witness is not waived.
8 All objections, except as to the form of the question, are
9 reserved until final hearing in this cause; and notice of
10 filing is waived.

11 * * * * *

12 Thereupon,

13 KATHLEEN A. REED

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

16 MS. RICHARDSON: Would you like to put in an
17 appearance, Ms. Pike?

18 MS. PIKE: For the record, I'm Therese Pike,
19 appearing on behalf of Kathy Reed, as private Counsel.

20 MS. RICHARDSON: Thank you. Hank, all yours.

21 MR. ANTHONY: There are four stipulations that we
22 have agreed to through these depositions, and I want to
23 let you know about them, to see if you have any
24 objections. First of all, that the deposition is being
25 taken pursuant to proper notice; secondly, that we

1 won't go off the record without the deponent's consent;
2 third, that we won't waive reading and signing; fourth,
3 that we will save any objections, except as to the form
4 of the question, until the time of the use of the
5 transcript.

6 MS. PIKE: Fine.

7 MR. ANTHONY: And one other preliminary matter,
8 Ms. Reed. These depositions are being taken as part of
9 the Florida Public Service Commission's investigation
10 into Southern Bell's trouble reporting practices.

11 As you may be aware, Southern Bell has conducted
12 its own investigation of those practices, as well.
13 That investigation is privileged, which means it was
14 done by the lawyers and nobody can obtain the results
15 of that. As a consequence, if you should receive any
16 questions that relate to your knowledge about that
17 investigation, which you told anybody or anybody told
18 you, then I'm going to ask you not to answer those
19 questions based on that privilege. Just so you're not
20 surprised, I wanted to let you know about that before,
21 okay?

22 THE WITNESS: Okay.

23 (Discussion off the record.)

24 MS. RICHARDSON: Okay. Ms. Reed, I only have a
25 few preliminary remarks myself, too. Just so that we

1 are clear and communicating and that I understand -- we
2 both understand what we are saying when we use some
3 very general terms.

4 THE WITNESS: Okay.

5 MS. RICHARDSON: The first one is "I don't know."
6 For purposes of the deposition, "I don't know" means
7 you have absolutely no personal, direct knowledge of
8 the events or the person or something that may have
9 taken place that we are discussing. It also means that
10 you haven't heard anything, outside source, secondary
11 information, hearsay, and so on. Is that acceptable to
12 you?

13 THE WITNESS: Uh-huh. Yes.

14 MS. RICHARDSON: Okay. And then it's pretty much
15 the same thing for "I can't remember" or "I don't
16 recall," or if I ask you, "Do you remember," and you
17 say, "No." Okay. Absolute blank on memory, there is
18 not something just sort of hanging out here that, you
19 know, vague thought. If there is, then tell me, "Well,
20 I really don't remember, but there may have been
21 something at some time." Is that acceptable?

22 THE WITNESS: Okay.

23 DIRECT EXAMINATION

24 BY MS. RICHARDSON:

25 Q Then if you would, I would like for you to start

1 by giving the court reporter your name, and if you would
2 spell it to make sure it's accurate on the record?

3 A My name is Kathleen A. Reed. That's
4 K-A-T-H-L-E-E-N, middle initial A. Last name is R-E-E-D.

5 Q And your address?

6 A And that is in

7

8 Q And what is your present position with the
9 Company?

10 A I'm an assistant manager.

11 Q Of an IMC or --

12 A In an IMC.

13 Q And is there more than one IMC in Broward or --

14 A I think -- yes. The other -- well, I'm in North
15 Broward IMC. The other one is South Broward. It's in
16 Hollywood.

17 Q You're in the North Broward IMC?

18 A Right.

19 Q Okay. I'm trying to kind of place you.

20 A Okay. I'm in North Broward.

21 Q And who is your present supervisor?

22 A Dennis Slattery.

23 Q Okay. And who is his supervisor?

24 A Bob Sattizahn.

25 Q All right. And how long have you held this

1 position?

2 A The position of assistant manager?

3 Q Uh-huh.

4 A Probably about 16 years.

5 Q Okay. And what pay grade is assistant manager?

6 A Pay Grade 3.

7 Q Pay Grade 3. And it has been the same position
8 with the North Dade IMC -- I mean, North Broward IMC?

9 A No, it has not.

10 Q It has not been. How long have you held the
11 position in North Broward?

12 A At the present time that I have been in North
13 Broward, it has been probably for the last five years.

14 Q Last five years. And what did you do immediately
15 prior to that?

16 A I worked out of the Coral Springs yard, which is
17 located out in Coral Springs, as assistant to the manager of
18 installation.

19 Q And when did you first start with the Company?

20 A Twenty-five years ago.

21 Q Okay. And what was your entry level position?

22 A I was a typist.

23 Q Okay. If you could briefly tell me about the
24 positions that you have held with the Company that deal with
25 customer trouble report handling. I think that would kind

1 of help me get a feel for how much experience you have with
2 that?

3 A Okay. As I said, prior to my five years in the
4 North Broward Maintenance Center, for about two years I
5 worked out in Coral Springs. And previous to that, I worked
6 in the maintenance center in Pompano Beach, which is now
7 part of the North Broward Maintenance Center, for probably
8 two years.

9 Q Okay. Would it be a fair statement to say, then,
10 that you are fairly familiar with customer trouble report
11 handling?

12 A Yes.

13 Q All right. And that would be from the initial
14 call-in through the repair, the actual repair work and the
15 clearing and closing of trouble reports?

16 A Well, the initial call-in is made out of another
17 office.

18 Q Okay.

19 A So, the initial call-in, I don't do anything with
20 that.

21 Q Okay. But after that then you get the statusing
22 of the report, the testing and statusing and the repair and
23 the clearing and the closing. You are familiar with all of
24 that process?

25 A Yes, I am.

- 1 Q Okay. You know what a disposition code is, then?
- 2 A Yes.
- 3 Q And a cause code?
- 4 A Yes.
- 5 Q And you know what a no access is?
- 6 A Yes.
- 7 Q What does a no access do on a report? What does
8 it mean?
- 9 A It means the installer went to the house, and the
10 customer wasn't home.
- 11 Q Okay.
- 12 A So, there was no access to fix the trouble.
- 13 Q All right. And when it was no access, is that
14 person, is the repair person supposed to let the customer
15 know that they couldn't get in?
- 16 A Yes, they leave a note on the door.
- 17 Q Okay. What about like a carryover no or the
18 C-O-N, the CON code, do you know what that is?
- 19 A Can you repeat that?
- 20 Q The C-O-N code, the CON code, or the carryover no
21 code?
- 22 A Yes, I know what that is.
- 23 Q All right. And what does that mean?
- 24 A That means when a customer called in to repair,
25 they said, "I don't want you to come," like on our normal

1 interval. Say we offered them tomorrow. They say, "No, I'm
2 not going to be home until Saturday." That's the code
3 that's used to put it in a file to hold it until that
4 Saturday.

5 Q And would it be appropriate that if the Company
6 wasn't going to be able to meet that commitment, to call the
7 customer to tell them that they weren't going to meet the
8 commitment time? Let's say you had set it up --

9 A You mean on Saturday?

10 Q Well, no, the first time. Let's say the customer
11 agreed to the initial commitment, and it was 5:00 on Friday.
12 The customer said, "Fine, I will be there at 5:00 Friday,
13 great come on out." And the Company was running late. They
14 had had a major cable break or something else went wrong and
15 just got backed up, couldn't meet that 5:00 commitment.
16 Then, would the Company call the customer and say, "I'm
17 sorry, we are not going to be able to get out there at
18 5:00"?

19 A Yes. They would make every attempt to do that.

20 Q Okay. And then let's say they did get the
21 customer and talked to the customer.

22 A You say they did?

23 Q They did. They reached them on the phone and
24 said, "We are not going to be there. I know we told you it
25 would be 5:00. We are not going to get there." Then would

1 the CON code be applied at that point?

2 A No.

3 Q Why not?

4 A Because it's not the customer's request. The CON
5 code is only used when the customer says, "I don't want you
6 to come on your normal intervals. I don't want you to come
7 today by 5:00. I want you to come Saturday at 5:00."

8 Q Have you ever managed or worked with anyone who,
9 an employee, who maybe thought that using the CON code under
10 the circumstances of the Company not making it and calling
11 the customer, and the customer agreeing to a later time was
12 proper?

13 MS. PIKE: I am going to object to the form of the
14 question as to what she knows another employee may have
15 thought.

16 MS. RICHARDSON: All right.

17 BY MS. RICHARDSON:

18 Q Okay. You supervise these individuals. Do you
19 supervise people who work with customer trouble reports and
20 enter data?

21 A Not at this time.

22 Q Did you in the past?

23 A I have in the past.

24 Q You have in the past supervised these individuals?

25 A Uh-huh.

1 Q And is part of your supervisory responsibility
2 being aware of how they handle the trouble reports and how
3 they use codes like the C-O-N code?

4 A Yes. I mean, I know how they are supposed to use
5 them.

6 Q Okay. And you know how they are supposed to use
7 them. Would you know and would your responsibilities
8 require you to know if they weren't using them properly?

9 A Yes.

10 Q Okay. So, looking back, then, thinking back, did
11 you have any occasion or have any knowledge, or were you
12 ever aware of one of the people that you supervised who may
13 have taken those CON codes and used them thinking or
14 whatever, using them, that we missed a commitment. "I'm
15 going to call the customer. We are not going to make it."
16 The customer agrees to changing the time, and I am going to
17 CON the report?

18 A No.

19 Q It has never occurred to your knowledge?

20 A No.

21 Q Have you ever heard of it occurring?

22 A No.

23 Q Do the no access codes and the CON codes, do both
24 of those codes stop that 24-hour repair clock from going
25 forward?

1 A I'm not sure.

2 Q All right. Well, let's talk about the repair
3 clock, then. Are you familiar with the rule of completing
4 repairs within 24 hours, the out-of-service repairs?

5 A Yes.

6 Q And that you have to meet that by 95 percent of
7 the Company?

8 A Uh-huh.

9 Q Okay. That's what I'm talking about, then.

10 A Okay.

11 Q Does the no access code and the CON code stop that
12 repair clock?

13 A I believe the CON code stops it. And I don't
14 believe that the no access code stops it, though.

15 Q Okay. If we had a report that has been an
16 out-of-service report that had been no accessed at 11:00,
17 and went out-of-service at 12:00, it would still be counted
18 against the Company in that out-of-service base on the 95
19 percent?

20 A I believe so. I'm not positive.

21 Q That's fine. Please feel free to clarify all of
22 your answers. That is certainly acceptable. And if I give
23 you a question that you don't understand or you're not sure
24 what I'm asking, please ask for clarification, so that the
25 record and you and I both are clear of the communication, so

1 that you don't think you said one thing, and I think you
2 said another.

3 A Right.

4 Q That's what we want to try to avoid doing today.
5 Okay. Can you tell me, Ms. Reed,

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A Not in my case. You know, I don't know about anybody else.

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A No.

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Q

11

A No.

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A I'm not sure what you're asking.

15

Q Outside of your conversation with Mr. Sattizahn or Mr. Ward.

17

18

19

20

THE WITNESS: No.

21

BY MS. RICHARDSON:

22

Q Okay. Have you ever reported any individual to a higher management, your supervisor or someone else for questionable activity or something that just appeared that maybe it might be wrong?

25

1 A No.

2 Q Have you ever reported anyone for falsifying
3 customer records?

4 A Not to my knowledge, you know, I don't believe so.

5 Q Okay. Do you know if anyone has ever reported you
6 for falsifying a company record?

7 A No, I don't know that.

8 Q Do you know if anyone has ever reported you for
9 questionable activities or mishandling something that's not
10 a deliberate falsification but something that may have
11 appeared to be questionable or improper?

12 A No, I don't.

13

14

15 A Yes.

16 Q And who is that, please?

17 A You want names of everybody that I know?

18 Q Yes, I do.

19 MR. ANTHONY: You're talking about in relation to
20 this investigation?

21 MS. RICHARDSON: Yes.

22 BY MS. RICHARDSON:

23 Q In relation to this case, not necessarily the
24 Company's investigation, but to this case?

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Q Uh-huh.

THE REPORTER: Would you spell that last name,
please?

THE WITNESS:

I'm trying to think of other ones.
That is about it for now. I'm sure there is probably more.

Q Okay. But those are the ones --

A Those are the ones that come to mind right now.

A I have spoken to them in reference to having to
come to a deposition today, about --

is about as far as we have discussed it.

Q Okay. So, you have had no conversations among

1 Q Okay. Within those conversations, have you all
2 done any thinking back and thinking, "Well, maybe they have
3 thought this was wrong; maybe the Company thought this was
4 wrong, or maybe they thought we were not doing this
5 correctly"?

6 A Yes, we had conversations about it, uh-huh.

7 Q Okay. And what did you come up with in your
8 conversations with them?

9 A Well, the thing that we discussed most was talking
10 about out-of-service over 24 hours, because that is
11 something that we do in the office. And there is a -- on a
12 trouble report that comes in there are two different
13 statuses that are put on it at the time that it's closed.
14 One is when the customer's line is cleared, when the
15 customer receives his dial tone. The other is when it's
16 actually closed out and the technician has completed his
17 work out in the field. And there is some question about
18 when the time that it has cleared being different than the
19 time that it is closed. The installers are instructed that
20 once they give dial tone to the customer, they should clear
21 out the trouble now that the customer is back in service.
22 Then do their routine, whatever they have to do, you know,
23 bury the wire, then that is the time the trouble is actually
24 closed out.

25 Q Have you ever seen a clearing time that was

1 earlier than a dispatch time?

2 A No.

3 Q Have you ever seen a clearing time that was
4 earlier than any other time preceding it on a report?

5 A I don't believe so. I don't even know if the
6 computer will let you do that.

7 Q Okay. Have you heard the term, "backing up the
8 time," Ms. Reed?

9 A Yes.

10 Q Okay. In reference to what?

11 A What I was just saying.

12 Q The clearing time and the closing time?

13 A And the close time, right. So that, you know,
14 even though you're going to close it at 5:00, you actually
15 gave the customer service at 3:30. Okay. Then you would
16 want to back it up to the time you gave the customer dial
17 tone.

18 Q And then was that the only idea that came out of
19 these group discussions

20 A .Right.

21 Q

22

23 A No, that is the only one that we have discussed
24 because that's --

25 Q Was any attempt made by the group, either

1 individually or as a group, the thought is made, maybe we
2 ought to run some analyses or reviews of some data from that
3 period of time to see if there was something there that we
4 may have missed or overlooked?

5 A What period of time are you referring to?

6 Q I don't know. What period of time do you think
7 this discipline relates to?

8 A I really don't know.

9 Q So, it could have been your entire 25 years with
10 the Company that this entry applied to?

11 A Probably not, because I didn't work in the
12 maintenance center for 25 years. No, I feel this is
13 strictly what has taken place in the maintenance center.

14 Q So, for that period of time, then, any of that
15 period of time in the maintenance center.

16 A Can you give me the question again? I'm not sure
17 I understand it.

18 Q Okay. Did you, or did any of your group, or any
19 individual in your group, think about maybe going back and
20 doing some statistical analysis of the trouble report
21 handling process to see if you could determine why it was or
22 what was going wrong at that point?

23 MS. PIKE: I don't have any objection if you ask
24 her what she thought or what she did. But you are only
25 to answer that part of the question if you know what

1 they thought or what they might have thought or what
2 they did, if you have personal knowledge of it.

3 THE WITNESS: I don't know of any reports that
4 were run. We run reports all the time for analysis
5 purposes, but for that specific reason to run reports
6 after, I have no knowledge of that.

7 BY MS. RICHARDSON:

8 Q I guess I'm asking did you all conduct your own
9 investigation other than just talking about it?

10 A We continually do audits within our office to be
11 sure things are being done right.

12 Q But that is on present -- that's on present
13 activity. I'm talking about going back and looking back
14 again at this past activity that may have been the subject
15 of the investigation?

16 A No, I have no knowledge of that.

17 Q Do you know of any procedure in any IMC that
18 you're familiar with that had a practice of having the
19 maintenance administrators call managers to get disposition
20 and cause codes to close out reports?

21 A No. You know they have a list of which ones to
22 use for what reason.

23 Q Would you consider it improper to have that done?

24 A Well, it would be proper if an MA wasn't sure, and
25 she was, you know, asking the supervisor, "I'm not sure

1 whether to use this code or that code, you know, which is
2 the correct one?"

3 Q But to tell them to do it every time, would you
4 consider that improper?

5 A An MA to do --

6 Q To call a manager every time to close out a report
7 if it was going to -- getting close to going over 24 hours,
8 or in jeopardy of going over 24 hours?

9 A Yes, I would say that is.

10 Q Okay. So, you have never heard of that being
11 done, either?

12 A No.

13 Q And you have never directed any of your employees
14 to do that?

15 A No, I have not.

16 Q Okay. What happens when you exclude a report?

17 A It's dropped out of the base, any base.

18 Q Okay. If it is excluded and was out-of-service
19 over 24 hours, would the customer get a rebate?

20 A No.

21 Q Okay. So, not only does it exclude it from the
22 repair base, but it excludes it from the rebate base?

23 A Right.

24 Q Okay. Do you know of anyone who has taken
25 out-of-service reports and excluded them in order to meet

1 that 24 hour clock time, and then reopened them in order to
2 actually clear and close the trouble?

3 A No.

4 Q You don't know of that being done. Have you ever
5 heard of that being done?

6 A No, I haven't.

7 Q All right. Have you ever directed anyone to do
8 that?

9 A No, I haven't.

10 Q And have you ever done that yourself?

11 A No.

12 Q When would it be proper to close out an
13 out-of-service report and open an employee report on the
14 same phone number?

15 A When the customer was not back in service?

16 Q Let's say -- yes, when the customer was not back
17 in service.

18 A I cannot think of any situation that would be
19 proper, because the first ticket shouldn't be closed out
20 until they have their dial tone back.

21 Q Do you know of any tickets that have been closed
22 out without giving customer dial tone?

23 A No.

24 Q Do you know of any tickets that have been closed
25 out without giving customer dial tone in error or by

1 mistake?

2 A Well, I mean people make mistakes, you know. I'm
3 sure in my career I've come across it, you know, just being
4 a supervisor.

5 Q Okay. Do you know of anyone who may have
6 interpreted Company procedures and rules as saying that it
7 would be permitted to take an out-of-service report and
8 exclude it and then reopen the report to continue?

9 A No.

10 Q In terms of the 95 percent index and the
11 out-of-service-over-24-hour base, do you know of anyone who
12 has taken affecting service reports and changed them to
13 out-of-service in order to build that base and meet that 95
14 percent index?

15 A No.

16 Q Does your group track where you are in that 95
17 percent on a daily or weekly basis?

18 A Yes, we do, on a daily basis.

19 Q Okay. So, you are daily aware of --

20 A Uh-huh.

21 Q -- where you stand with that index?

22 A Yes.

23 Q And the kind of reports that you use to let you
24 know daily, what do they show?

25 A It depends on how you ask for them, but usually

1 you get like the telephone number -- oh, no, wait a minute.
2 No, that is another one. You want to know which report?

3 Q Yes, that you keep up with on a daily basis that
4 tells you if you're meeting that 95 percent index or you're
5 in danger of missing that?

6 A I'm not exactly sure what the report number is,
7 but it shows you how many misses you had, you know, for that
8 day.

9 Q Okay.

10 A And then also a cumulative for the month, you
11 know, where you're at for the month, is what it shows.

12 Q Does it give you a percentage?

13 A Uh-huh. I believe it's a percentage.

14 Q Okay. And does it tell you how many more
15 out-of-services you might need in order to make 95 if you're
16 at 90 percent or 94 percent? Does it tell you?

17 A No, I've never seen that on any report.

18 Q Okay. Do you know of anyone, then, who has taken
19 any means whatever when they were in danger of missing that
20 95 percent index to build the base so that they could meet
21 that index?

22 A No, absolutely not.

23 Q Do you know of anyone who may have interpreted
24 Company directives from any manager in the Company, not
25 necessarily yourself and Mr. Slattery, but any manager in

1 the Company, who may have interpreted directives toward
2 meeting that 95 percent base, thinking that whatever action
3 they took toward meeting that base would be appropriate? Do
4 you know -- and this can be personal, firsthand knowledge.

5 MS. PIKE: Okay. Your personal, firsthand
6 knowledge. If you have personal knowledge, you can
7 testify to that.

8 THE WITNESS: I don't.

9 BY MS. RICHARDSON:

10 Q Okay. Have you ever heard of anyone who has felt
11 that it would be proper to build the base to meet that 95
12 percent index?

13 A No.

14 Q Do you know of anyone who has used any means
15 whatever then to exclude out-of-service reports over 24
16 hours from that repair base in order to meet that index?

17 A No, I don't.

18 Q Have you ever heard of anybody doing that?

19 A No.

20 Q Have you ever directed anyone to exclude reports
21 when they have gone out-of-service over 24 hours?

22 A No.

23 Q Have you ever done that yourself?

24 A No, I haven't.

25 Q Do you know of anyone who has taken test okay

1 reports and stasured them as out-of-service?

2 A Test okay reports? You mean a customer calls a
3 trouble in and they say they don't have dial tone and it is
4 tested okay?

5 Q Uh-huh.

6 A I believe those were stasured out-of-service, if
7 the customer said they didn't have dial tone. If the
8 customer said they had no dial tone, then they would be
9 stasured out-of-service.

10 Q Okay. Regardless of what the test showed?

11 A Right.

12 Q Okay. Do you know of anyone who has taken those
13 test okay reports and stasured them out-of-service in order
14 to meet or build the out-of-service-over-24-hour base?

15 A No.

16 Q Have you ever heard of anyone creating trouble
17 reports in order to build the base?

18 A No.

19 Q And you've not directed anybody to do that?

20 A I have not.

21 Q And you have never done that yourself?

22 A No, I haven't.

23 Q Okay. Do you know of anybody who has violated
24 Company procedures for handling customer reports? And let
25 me add intentionally to that?

- 1 A No.
- 2 Q Do you know of anyone who has unintentionally
3 violated Company procedures on handling customer reports?
- 4 A I don't.
- 5 Q Do you know of anybody or any employee who has
6 used another employee's code number to status a report?
- 7 A No.
- 8 Q Do you know of anyone who has used an unassigned
9 employee code number to status a report?
- 10 A No.
- 11 Q Do you know of anyone who has used a dummy or a
12 phony employee code number to status a report?
- 13 A No, I don't.
- 14 Q Okay. Have you ever used anybody else's employee
15 code?
- 16 A No, I haven't.
- 17 Q Have you ever directed someone else to use another
18 person's employee code?
- 19 A No.
- 20 Q Do you use temporary codes in this area in the
21 IMC? If you have someone on loan from another area, do you
22 assign temporary codes?
- 23 A Yes.
- 24 Q Okay. And where do the temporary codes come from?
- 25 A Now, the only time I assign a temporary code would

1 be for like installers that I am borrowing from another
2 area. I don't know of any temporary codes that are used in
3 the maintenance center.

4 Q Okay.

5 A Is that what you're asking me?

6 Q That's fine.

7 A Okay. Those codes would be -- we have got codes
8 in the computer for people that we have borrowed, and we
9 would pick one of those codes and assign it to that
10 particular technician for the day or the week or whatever.

11 Q Okay. And are temporary codes unassigned codes,
12 generally? Or are they codes that are left vacant from
13 someone retiring or leaving the Company or --

14 A These installer codes are vacant unless we, you
15 know, need to use them.

16 Q Okay.

17 A They are just always there, and they are just
18 shown as a loaner.

19 Q Then taking these temporary codes, let's run back
20 one more time through my series of questions, okay?

21 A Okay.

22 Q On the temporary codes, do you know of any
23 employee who has used a temporary code other than for the
24 specific job and function assigned?

25 A No.

1 Q Have you ever, yourself, given an employee a
2 temporary code to use for the customer trouble report
3 handling?

4 A No.

5 Q You're familiar with disposition codes, you said.
6 Are you familiar with the disposition codes that would
7 exclude a report from that index base?

8 A Disposition codes? I'm not familiar with any that
9 would exclude an out-of-service disposition code.

10 Q Exclude may be the wrong word. Excluded it from
11 being counted in the out-of-service-over-24-hours base?

12 A You'll have to excuse me, because I haven't worked
13 with disposition codes for awhile in my present position,
14 but I don't know of any disposition codes that would exclude
15 a report from going over 24 hours.

16 Q Okay. I'm glad you said that, because I'm going
17 to try to make my question more clear.

18 A Okay.

19 Q Okay. Let me just give some examples of some
20 codes, then. Would a report that had been closed to a
21 disposition code of lightning, okay, when we count that 95
22 percent index, okay, and this report happened to go
23 out-of-service over 24 hours, would it be counted against
24 that 95 percent or would it be taken out of that count?

25 A I'm not sure. I don't know of a disposition code

1 that does that.

2 Q You don't know any of them?

3 A No, I know disposition codes. I don't know of one
4 that would exclude a report being counted in the
5 out-of-service-over-24-hour base.

6 Q That is clear enough. Great. Thank you. We are
7 communicating. That is important.

8 A Okay.

9 Q Do you know of any other means whatsoever that you
10 have ever heard of being used to build that base to meet the
11 95 percent index?

12 A No, I don't.

13 Q Other than the exclude function, then, do you know
14 of any other means whatever of exempting a report, an
15 out-of-service report, from that repair index base?

16 A I believe that cause codes can exempt. I believe.

17 Q All of them or just certain ones?

18 A Just certain ones.

19 Q Like customer action?

20 A I'm not sure that customer action is one, but --
21 and I am not positive what they are. But I believe there
22 are cause codes. I would have to have my little sheet with
23 me to help me along here.

24 Q And I probably should amend what I said earlier.
25 I think lightning is a cause code, not a disposition code.

1 A I think it is. I'm a little confused.

2 Q Let me take -- go back just one step. What about
3 inside wire codes as a disposition code? Would that take
4 that report out of that 24-hour base?

5 A I don't believe so. I'm not sure.

6 Q Do you know of anyone who has falsified a customer
7 record?

8 A No.

9 Q Have you ever heard of anybody falsifying a
10 customer record?

11 A No.

12 Q And you have never done so yourself?

13 A No, I have not.

14 Q And you have never directed anyone to?

15 A No, I have not.

16 Q Are you familiar with any recent changes, say,
17 from January of this year, '92, that have been made in
18 customer trouble repair processing?

19 A Processing the trouble?

20 Q Yes. Any changes the Company has made in handling
21 customer repair reports?

22 A Let me think now. I wish I had all of my files
23 with me, but there have been changes.

24 Q Wouldn't it be great just to bring all the
25 cabinets in?

1 A Yes, really. There have been changes. You know,
2 I --

3 Q Okay. Do any important or significant changes
4 stand out in your mind, any that seem important and
5 significant to you?

6 A I think there was a change in something about the
7 over 24 hours, how to status them or something. It was not
8 -- we have not changed, I explained earlier about the clear
9 line and the close line, but it seems that there was
10 something about that. And I can't tell you exactly what it
11 is at this time.

12 Q Okay. In your opinion, do you think that these
13 changes have been made to correct perceived errors, changes
14 in policy and procedure?

15 MS. PIKE: If you know.

16 BY MS. RICHARDSON:

17 Q In your opinion.

18 A I don't know. You know, I would assume.

19 Q That they have?

20 A Yes.

21 MS. RICHARDSON: Okay. Ms. Reed, I want to thank
22 you for your appearance here today.

23 THE WITNESS: You're welcome.

24 MS. RICHARDSON: And I appreciate your time, and I
25 appreciate your attorney's time being here. There are just

1 a few questions I think, maybe, from the Public Service
2 Commission before we can let you go.

3 THE WITNESS: Okay. That's fine.

4 MS. RICHARDSON: This is Mr. Greer.

5 THE WITNESS: Hi.

6 CROSS EXAMINATION

7 BY MS. RICHARDSON:

8 Q I have just one or two.

9

10

11 Q To --

12

13 Q What was the outcome of that?

14 A I never received an answer back from him.

15 MR. GREER: That's all I have. Thank you.

16 (The deposition concluded at 10:30 a.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(es) before testimony was taken.

DATED THIS 27th day of September, 1993.



JANE FAUROT
MY COMMISSION # CC295576 EXPIRES
July 18, 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 37 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,

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

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

