

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

SCANNED

DOCKET NO. 910163-TL

FILED: July 21, 1992

IN RE: Petition on behalf of CITIZENS )  
OF THE STATE OF FLORIDA to initiate )  
investigation into integrity of SOUTHERN )  
BELL TELEPHONE & TELEGRAPH COMPANY'S )  
repair service activities and reports. )

DEPOSITION OF: RICHARD PHILLIP COLLAMATI

TAKEN AT THE INSTANCE OF: Office of Public Counsel

PLACE: Southern Bell Offices  
903 West University Avenue  
Gainesville, Florida 32601

TIME: Commenced at 10:35 a.m.  
Concluded at 11:10 a.m.

DATE: Thursday, July 30, 1992

REPORTED BY: Marie C. Gentry  
Court Reporter

- - -

COPY

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I N D E X

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Page No.

ERRATA SHEET

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STIPULATION

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AFFIDAVIT OF DEPONENT

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CERTIFICATE OF OATH

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CERTIFICATE OF REPORTER

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WITNESS

RICHARD PHILLIP COLLAMATI

Examination by Mr. Beck

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Examination by Mr. Hatch

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EXHIBITS

Deposition Exhibit No. 1

29

Deposition Exhibit No. 2

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(NOTE: Deposition Exhibit No. 2 was not furnished to reporter.)

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S T I P U L A T I O N

IT IS STIPULATED that this deposition was taken pursuant to notice in accordance with the applicable Florida Rules of Civil Procedure; that objections, except as to the form of the question, are reserved until hearing in this cause; and that reading and signing was not waived.

IT IS ALSO STIPULATED that any off-the-record conversations are with the consent of the deponent.

1 RICHARD PHILLIP COLLAMATI,

2 appeared as a witness and, after being duly sworn by the  
3 court reporter, testified as follows:

4 - - -

5 MR. LACKEY: I'm Doug Lackey and I am representing  
6 BellSouth Telecommunications, Inc., in this deposition.

7 There's a couple of preliminary matters we need  
8 to talk about before Mr. Beck and Mr. Hatch ask any  
9 questions of you.

10 The first is a pretty simple one. This lady is a  
11 court reporter and she is taking down everything that  
12 I'm saying, she's going to take down the questions and  
13 your answers, and assuming that this proceeding is  
14 subsequently transcribed, you will have the right,  
15 unless you choose to waive it, to read what she has  
16 written and to make any corrections that are necessary  
17 and to sign it. It's my understanding that you want to  
18 do that and do not want to waive that.

19 THE WITNESS: Right.

20 MR. LACKEY: The second thing is I need to give  
21 you an instruction and I'm going to try to make it as  
22 clear as I can, but, if you don't understand it or you  
23 have any questions about it, please just ask me.

24 THE WITNESS: Okay.

25 MR. LACKEY: During the course of this deposition

1 Mr. Beck or Mr. Hatch may ask you questions which will  
2 require you to divulge information that you may have  
3 learned during an investigation conducted by Southern  
4 Bell at the direction of its Legal Department. If such  
5 a question is asked, I am going to object to the  
6 question on the grounds that it calls for privileged  
7 information and I'm going to instruct you not to answer  
8 the question. At the same time, if such a question is  
9 asked and you have personal knowledge, personal  
10 knowledge, not knowledge obtained during the course of  
11 the investigation, regarding that question, you should  
12 go ahead and answer the question with that information  
13 fully and completely.

14 There may be occasions where I do not object to a  
15 question but you know that in order to respond to that  
16 question you're going to have to divulge what I've  
17 described as privileged information, that is, information  
18 you learned during the course of the investigation I  
19 referred to. If that is the case, if you would simply,  
20 please, tell us to stop and discuss that with me, I will  
21 handle it from there.

22 Now, we have a complication here in Gainesville  
23 which I'm going to try to explain to you now.

24 There have been two investigations in Gainesville  
25 regarding out-of-service reports, apparently. There was

1 one done in October, November, December of 1990, the end  
2 of 1990 or the first month in 1991. It was done by the  
3 Security Department of Southern Bell. That investigation  
4 is not privileged and anything that you learned, if you  
5 happened to be involved in that in any way, and I don't  
6 know that you were, but if you happened to be involved  
7 in that investigation, anything that you may have learned  
8 as a result of that investigation is not privileged and  
9 you should feel free, if it's necessary or called for,  
10 to respond to Mr. Beck with that information.

11 The only investigation that I'm concerned with at  
12 this point is the one that was conducted subsequent to  
13 that. If you were interviewed during that investigation,  
14 it was one in which a Southern Bell attorney participated  
15 or an attorney representing Southern Bell participated,  
16 that's what I'm referring to as the privileged  
17 investigation.

18 There was one issue that has come up earlier that  
19 needs to be clarified. If you have any knowledge about  
20 the first investigation, the mere fact that that first  
21 investigation may have been mentioned in the second  
22 one doesn't make that information privileged. If you  
23 know something because of the first investigation,  
24 the mere fact that it may or may not have been  
25 discussed in the second investigation doesn't make

1 the information privileged. Okay?

2 THE WITNESS: Okay.

3 MR. LACKEY: Is my instruction clear?

4 THE WITNESS: I believe so.

5 MR. LACKEY: If you have any questions at any time,  
6 let's just stop and talk about it.

7 THE WITNESS: Okay. What you're saying is, if you  
8 say "Don't answer," I don't answer?

9 MR. LACKEY: That's correct. If I instruct you not  
10 to answer a question, you do not answer.

11 THE WITNESS: And as far as learning anything from  
12 any investigations, they didn't tell me anything, they  
13 just asked questions.

14 MR. LACKEY: Okay.

15 - - -

16 EXAMINATION

17 BY MR. BECK:

18 Q Mr. Collamati, my name is Charlie Beck. I'm with  
19 the Office of Public Counsel. I'm going to start off. There  
20 may be other questions from others after I've finished.

21 A Okay.

22 Q Would you please state your full name?

23 A My full name is Richard Phillip, last name is  
24 Collamati, C-o-l-l-a-m-a-t-i.

25 Q Are you employed by Southern Bell?



- 1 A Yes, sir.
- 2 Q What is your position with the company?
- 3 A I'm a manager.
- 4 Q Where are you a manager?
- 5 A I'm based out of Brooksville.
- 6 Q And do you supervise the installation and  
7 maintenance center there?
- 8 A No. I manage the installation and maintenance  
9 forces, construction forces, cable repair, anybody that's  
10 outside, from Pasco County to the Georgia line.
- 11 Q How long have you held that position?
- 12 A Over two years. I think it was June of '90, I  
13 believe.
- 14 Q What position did you hold before that?
- 15 A I was manager in the IMC here.
- 16 Q And how long were you manager here?
- 17 A Three years, two and a half to three years.
- 18 Q By "here" you mean Gainesville?
- 19 A Yes, sir.
- 20
- 21
- 22 A I sure did.
- 23
- 24 A Amongst other things, yes, sir.
- 25 Q What else did they discuss with you?

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10 Q Do you have any knowledge of persons backing up  
11 times on out-of-service reports to a time other than the  
12 clear time?

13 A No, sir.

14 Q Have you heard of persons doing that?

15 A No, sir.

16 Q Do you have any knowledge of persons statusing Test  
17 OK trouble reports as out-of-service trouble reports?

18 A As far as when it tested right then or when it  
19 tested when it came in? You know, because there's times a  
20 trouble comes in in the middle of the night and it may have a  
21 hard short on it or something then, and then when you test it  
22 the next morning it may be Test OK then. You know, I've  
23 heard of that, yes. But at one time there was a defective  
24 problem on it, the hard trouble. The other thing is, as far  
25 as statusing out of service, I believe -- and, here again,

1 I'm reaching back. Three, four, five, six years ago one of  
2 the guidelines were what the customer says is what dictates  
3 whether it's statused out of service or not. This was before  
4 MLP and all that.

5 Q Do you have any knowledge of Test OK being statused  
6 as out of service improperly?

7 A No, sir.

8 Q Have you had a practice either in Brooksville or in  
9 Gainesville of requiring maintenance administrators to  
10 contact a manager to get the close-out codes for reports?

11 A I do not have MAs, of course, in Brooksville, so,  
12 you know -- and my people there are on computers. They're  
13 not supposed to talk to the MAs because it's supposed to be  
14 inefficient and the guys don't want to because they end up  
15 being put on hold.

16 At one time, yes, when I was here, I did institute  
17 for training a -- you know, if it's out of service, have  
18 somebody look at it because what we were doing is we were  
19 shooting ourselves in the foot. You would have a cut cable  
20 closed out to plant equipment. Okay. Now, cables don't cut  
21 themselves. It should have been other utility, foreman,  
22 workman, Bell System employee. You know, just for training,  
23 yes, we did do that.

24 Q Were the MAs required to do that on every  
25 out-of-service report; in other words, check with a manager

1 for the close-out codes?

2 A On most of them, but particularly if they were over  
3 24, yes, sir.

4 Q Okay. Let me understand. How would an MA know  
5 when they had to check with a manager to get the close-out  
6 code?

7 A If she had any doubt as far as what the cause code  
8 -- if it was right -- because they were more familiar with  
9 the cause codes than the outside people at that time. Okay?  
10 Because they used them 150 times a day, whereas the outside  
11 guys did not. They used it four or five times a day. If  
12 they felt that there may be a problem, I had asked them to  
13 check with somebody if they didn't know which was right or  
14 wrong, or if it was over 24, you know, and they felt we were  
15 shooting ourselves in the foot, to go ahead and check with  
16 somebody.

17 Q Okay. And those people would be in a place called  
18 the back room? Is that where the managers would be?

19 A No, floor foremen, any foreman.

20 Q But they were required in the over 24-hour cases to  
21 contact a manager?

22 A That was part of it, yes.

23 Q Do you know of any instance where the manager would  
24 direct a close-out code that was not proper?

25 A No, sir.

1 Q Have you heard of that being done?

2 A No, sir.

3 Q Have you ever heard of out-of-service reports being  
4 improperly classified as affecting service?

5 A No, sir.

6 Q How about the reverse of that, affecting service  
7 reports being classified as out of service?

8 A Not wantingly, you know, to do it wrong, no, sir.

9 Q I'm not referring to just an occasional mistake,  
10 I'm saying --

11 A No, sir.

12 Q Is there a place called the back room?

13 A The back room was the people that handled load  
14 control and people still refer to -- you know, Stan Dean,  
15 he's the one that moves load and force. Right now that's  
16 strictly what he does. He's busier than a one-armed paper  
17 hanger right now.

18 Q Why is it called the back room?

19 A Because it was always in the back. That's all.  
20 And at one time it was even removed because there was no  
21 physical space in here. We put them back where Jack Finnegan  
22 is now and it was -- I don't know. It was just called the  
23 back room and it was called that in several centers. You  
24 know, it was load control or back room.

25 Q Do you know of any instances where an MA contacted

1 a manager on out of service 24 hours and they were told to  
2 use an exclude code that didn't apply to the report?

3 A No, sir.

4 Q Have you heard of that being done?

5 A No, sir.

6 Q Do you know what I mean by an exclude code?

7 A Yes, exclude the trouble completely. I mean, you  
8 know, to take it out. I mean, you know, like -- what would  
9 be an exclude? A customer changed their mind, cancelled the  
10 report or something. No, I don't think that's done anymore.

11 Oh, you mean those, exclude from the PSC base?

12 Q Yes.

13 A I'm sorry. I thought you meant exclude trouble  
14 totally.

15 Q No.

16 A Ask the question again now.

17 Q Okay. By "exclude," I was asking for something  
18 that would take it out of the PSC rule, and a specific  
19 example would be lightning.

20 A Yes. But what was the whole question again?

21 Q Have you ever heard of a manager telling an MA to  
22 use that exclude code on an out of service over 24 hours in  
23 instances where, in this case, lightning didn't apply?

24 A No, sir.

25 Q I take it then you have no knowledge about that



1 ever being done either?

2 A No, sir.

3 Q Do you recall when you put into effect the policy  
4 that would require the MAs to contact managers on out of  
5 service over 24 hours?

6 A It would have to be four or five years ago, I  
7 guess, something like that. I don't know exactly.

8 Q Do you know how long it stayed in effect?

9 A How long did it stay in effect? Probably, like  
10 everything else, two or three weeks. You know, I mean -- it  
11 seems like we'd start programs and then we'd move on to  
12 something else, you know, and how much it was followed up, I  
13 don't know. I was probably being a little facetious when I  
14 said two or three weeks. It may have been a month. It may  
15 have been -- you know, it's one of them things you sit down,  
16 "Guys, how can we stop ourselves from shooting in the foot?"  
17 "Well, maybe if we check them, you know, we won't shoot  
18 ourselves in the foot." "Okay. Well, let's do that."

19 So you put out a little memo that says, "Hey, in  
20 the future, do this." How long it stayed in effect, I'm sure  
21 -- I mean, as far as wantingly and everybody doing it, I'm  
22 sure it wasn't very long.

23 Q Why do you think it ended after not very long?

24 A Why? It's one of them things you move on to  
25 something else. But, I mean, you know, priorities change,

1 other things get hotter, we might have been working on  
2 repeats, we might have been working on missed appointments,  
3 we might have been working on who knows what, you know. Like  
4 I said, priorities change.

5 Q Did you ever have a policy of having repeat  
6 customers contact or calling a special number to have their  
7 repairs made?

8 A On the hot customers where we've been out there  
9 four, five, six times and you could tell they were being  
10 aggravated and it was taking a lengthy amount of time for  
11 them to call the CRSAB and then them call us, yes, there were  
12 specific customers where a manager might have gone out and  
13 say, "Ma'am, I'm going to give you preferential treatment  
14 and, if you have any problems, here's my card, here's a  
15 number to call and I'll get somebody right out" type stuff,  
16 yes.

17 Q How would you record that? If they called back in  
18 with a repeat on that, how would that be recorded in the LMOS  
19 System?

20 A As a trouble report.

21 Q Would it be a new trouble report?

22 A Yes, brand-new trouble report, sure would, because  
23 that was the only way to dispatch somebody out there, or the  
24 easiest way, let's put it that way.

25 Q Is that policy still in effect?

1           A       I have my foremen right now, you know, if they have  
2 an irate customer, especially a business, where they're  
3 having chronic problems, yes, I mean, he'll give them his  
4 card and say, "If you're having any problems, please give me  
5 a call," you know.

6           Q       Do you have any knowledge of the use of no-access  
7 codes being used to stop the clock when, in fact, there's no  
8 problem with no access?

9           A       No, sir.

10          Q       Have you heard of that being done?

11          A       No, sir.

12          Q       Do you have any knowledge of excluding reports that  
13 were about to miss the commitment time and then having those  
14 reports being reopened as employee-generated reports?

15          A       No, sir.

16          Q       Have you ever heard of that being done?

17          A       No, sir.

18          Q       Do you have any knowledge of statusing affecting  
19 service trouble reports as out-of-service trouble reports?

20          A       No, sir.

21          Q       Have you ever heard of that being done?

22          A       No, sir, not wantingly.

23          Q       You know, on any of these I'm not thinking that  
24 that's just a mistake.

25          A       Right, yes.

1 Q Purposely being done?

2 A No.

3 Q Do you have any knowledge of CON Codes being used  
4 in instances where the customer did not ask for a different  
5 repair time?

6 A Not wantingly, no, sir.

7 Q Have you ever heard of that being done?

8 A No, sir.

9 Q Do you have any knowledge of Test OKs being  
10 stasured as out-of-service reports?

11 A Well, not except for that thing we talked about  
12 earlier, you know, where it came in and there was a physical  
13 problem on it and then by 9:00 o'clock in the morning it  
14 tested okay.

15 Q Have you ever heard of Test OKs being purposely  
16 recorded as out of service when, in fact, they were not?

17 A No, sir.

18 Q Do you have any knowledge about the use of  
19 fictitious employee codes on repair reports?

20 A No, sir.

21 Q Have you ever heard of that being done?

22 A No, sir.

23 Q Do you know of any other means other than what  
24 we've discussed of building up the out-of-service base with  
25 reports that shouldn't have been in there?

1 A Outside of --

2 THE WITNESS: Can I ask you a question in  
3 front of them or --

4 MR. LACKEY: No, let's go back here and talk.

5 (Off the record.)

6 THE WITNESS: I had to find out when it happened.

7 A To answer your question, yes, there was an  
8 instance, I believe, after I left of an employee building the  
9 base, going through the phone book and creating troubles.

10 Q Was that in Gainesville?

11 A Yes, sir.

12 Q And what do you know about that?

13 A I think it was in the town of -- I want to say  
14 Keystone or Hawthorne, I'm not sure which one, and that an  
15 employee did go to the phone book and create trouble reports.

16 Q Do you recall the time frame that that occurred?

17 A Had to be after June of '90. I don't know when.  
18 It was after I left.

19 Q Do you know the name of that employee?

20

21 Q And is this just something you've heard about or do  
22 you have any personal knowledge?

23 A I do not have personal knowledge. Something that  
24 was talked about.

25 Q During a security investigation?

1           A       Well, you know, it was during the investigation but  
2 a security person did not tell me about it, I don't think. I  
3 don't know. It may have just been rumor, gossip-type stuff,  
4 you know. I don't know exactly who told me.

5           Q       Other than the things we've talked about already,  
6 do you have any knowledge of any other means of excluding  
7 out-of-service reports from the PSC rule requirement?

8           A       No, sir, outside of the exclude classes and  
9 everything you've said, you know, meaning, it's -- no, sir.

10          Q       Okay. On the exclude causes, I thought you had  
11 told me you had no knowledge about exclude codes being used  
12 improperly.

13          A       No, no, no, you're asking me ways to get out of it,  
14 and outside of closing out the report completely, putting a  
15 cause code that will exclude it or building the base, I can't  
16 think of any way to change the results.

17          Q       Do you have any knowledge of that being done?

18          A       No, sir.

19          Q       Have you heard of any means of doing such things?

20          A       No, sir.

21          Q       Do you have any knowledge of customer repair  
22 records being falsified in any manner other than what we've  
23 discussed today?

24          A       No, sir.

25          Q       And have you heard of any?

1 A No, sir.

2 Q Do you have any knowledge --

3 A Well, wait a minute now. You're talking about the  
4 repair records?

5 Q Yes.

6 A Because I read in the paper, you know, about sales  
7 records and stuff like that.

8 Q Putting aside that.

9 A Okay. No.

10 Q Do you have any knowledge of employees calling in  
11 reports of out of service themselves?

12 A Only what I heard that came out of South Florida,  
13 you know, task building, I think they called it. I heard  
14 something about that.

15 Q Have you heard of that being done in Central  
16 Florida?

17 A No, sir.

18 Q Where did you hear about it occurring in South  
19 Florida?

20 A I heard some people were terminated about a year or  
21 year and a half ago in South Florida.

22 Q Do you recall how you heard that?

23 A It don't take long for something like that to go  
24 through the company. You know, I mean, somebody told me. I  
25 don't know who.

1 MR. BECK: Mr. Collamati, that's all I have.  
2 Thanks. There may be some other questions.

3 EXAMINATION

4 BY MR. HATCH:

5 Q Mr. Collamati, my name is Tracy Hatch. Just a  
6 couple of questions.

7 If you could look at that.

8 A (Reviews document.)

9 Q You can circulate it and let everybody have a look  
10 at it.

11 With respect to Paragraph 3 there, it talks about  
12 changing a service affecting to an out of service. Could you  
13 explain what that refers to?

14 A (Reading from document.) "The appointment of all  
15 troubles reflected on the ROSL which are more than 24 hours  
16 out..."

17 No. What it's saying is change the commitment to  
18 -- not to change it from out of service to affecting service.  
19 It says to change the commitment and use a customer direct  
20 report which does not change the original commitment.

21 See, what drives the dispatchers in LMOS is the  
22 biggest driver back then was the commitment time. If you  
23 called in a report and they gave you an affecting service  
24 type time and it was subsequently found to be out of service,  
25 then the commitment was going to be more than 24 hours. So



1 what we were doing there was back it up to a minimum of three  
2 hours before it went over 24 to give the machine time to get  
3 ahold of somebody, dispatch them out there and have it  
4 cleared before the 24. That's what that's trying to do.

5 And you have to make them CDs so it did not change  
6 the original commitment. If you use CX, which some people  
7 have done --

8 Q Yes.

9 A -- it changed the original commitment.

10 Q Is it still possible to do that? Does the system  
11 still work that way?

12 A I don't know. I can't -- there's been two and a  
13 half years since I worked with the system.

14 Q LMOS?

15 A Yes. I mean, I looked at it to see how many  
16 troubles, but with all the changes that have been put in and  
17 the modifications that have been made in the last year, I  
18 couldn't honestly answer that question. I think it still  
19 does, but I'm not sure.

20 Q Just for the court reporter's benefit, "LMOS" is  
21 caps, L-M-O-S.

22 A I'm sorry.

23 Q How much pressure is on you as a manager to meet  
24 the out of service 24 requirement?

25 A How much pressure is on me? Enough so that it's --

1 I mean, I know it's a thing we've got to make. It's a thing  
2 that we need to spend a little bit of money to try and make,  
3 and with our geographics sometimes we have to spend a little  
4 money, you know, realizing that the PSC, or my impression of  
5 the PSC is that they treat the small exchanges the same way  
6 as they do the big ones. Okay?

7 If we don't make the indices in Cedar Key, it's the  
8 same thing as not making it in Jacksonville. Okay? So we do  
9 spend a little extra money, and especially this day and time  
10 with a little bit of overkill, on trying to get them covered.

11 I have been known to drive people 40 or 50 miles at  
12 5:00 o'clock at night on one that's going to go over 24 at  
13 9:00 o'clock the next morning knowing that I can't get  
14 somebody there and cleared by 9:00 o'clock and spending  
15 overtime to get it done. That's about the amount of pressure  
16 that I've done on it is just knowing the fact that we have to  
17 try and meet them.

18 Now, I'm going to miss some this month and I'm sure  
19 that I'm not going to get yelled at or shot about it, you  
20 know.

21 Q How frequently does that typically happen, how many  
22 out of service over 24? Is it a fairly constant flow or is  
23 it always building?

24 A Oh, yes. Like I said, with our geographics, it  
25 only takes one out of service in Yankeetown or in Cedar Key

1 or -- if we miss one, we'll miss the exchange. I mean,  
2 that's a given. Some exchanges that I'm responsible for now,  
3 you might be able to miss two and maybe you'll make the  
4 exchange and maybe you won't.

5 Q How often do you fail to meet the 95 percent  
6 requirement?

7 A I think -- like I said, I know I'm going to miss  
8 some this month. It will probably be in Old Town and  
9 Dunnellon, maybe. But the weather up until this past month  
10 has been very good and we have not had a lot of lightning  
11 storms. Right now we have lightning storms down there come  
12 through every day -- well, except for the last four days;  
13 knock on wood.

14 Q If you'll look at this one. This is a memo, I  
15 think, you wrote.

16 A (Witness complies.)

17 Q It refers down there that you're having a lot of  
18 difficulty meeting your requirements.

19 A Yes, because of the geographics and the small  
20 exchanges.

21 Q Does that still happen? Do you still have a lot of  
22 difficulty meeting that 95 percent rule every time?

23 A I'm spending money to make it, yes, sir. Like I  
24 said, I'm having to drive people long distances and we're  
25 working overtime to try and make it. And, you know, that's

1 one of the reasons that on that other memo it said to have  
2 somebody check them because of -- you know, people were not  
3 putting the cleared time at that time. This day and time it  
4 doesn't matter.

5 Q The clear time versus the close time?

6 A Yes.

7 MR. ZELMAN: Let me ask you to do one thing.  
8 The 11/88 letter and that 8/89 letter, especially the  
9 '88 letter has a lot of technical terms in that  
10 Paragraph 3. If you don't have any problem with that,  
11 I'd like for you to make that an exhibit to the  
12 deposition.

13 MR. HATCH: I have no problem.

14 MR. ZELMAN: As far as the memo, I don't care  
15 one way or the other. The '88 letter is a bit complex  
16 and I would like to have that in there.

17 MR. HATCH: Why don't we have them both attached  
18 as deposition exhibits?

19 MR. ZELMAN: That's fine. Would you identify  
20 them for us, please?

21 MR. HATCH: There is a letter from Mr. Collamati  
22 to Mr. T. E. Jones dated November 18, 1988. We can  
23 have that marked as Deposition Exhibit 1 to his  
24 deposition.

25 (The document last above referred to was marked

1 for identification as Deposition Exhibit No. 1.)

2 MR. HATCH: The second document is a memo to  
3 Mr. C. E. Rehm, R-e-h-m, from Mr. Collamati, and we'll  
4 have that marked as Deposition Exhibit No. 2.)

5 (The document last above referred to was marked  
6 for identification as Deposition Exhibit No. 2.)

7 BY MR. HATCH:

8 Q Earlier in talking with Mr. Beck, I just want to  
9 make sure that I'm clear about your response, is that I got  
10 the impression that it was possible to exclude a trouble  
11 report completely from presumably LMOS.

12 A No.

13 Q Where you could exclude any record of a  
14 transaction.

15 A No. Once something is in LMOS, unless the machine  
16 hiccups and spits it out, it's in there forever.

17 Q When you were talking with Mr. Beck about, for  
18 example, a repairman who has been doing a lot of work with a  
19 business customer and had a lot of trouble, spent a lot of  
20 time working on it, sometimes they will give them a business  
21 card to call them directly. When the service tech gets a  
22 call from that customer directly, what does he do then?

23 A The repairman hopefully is not getting them; his  
24 foreman is. The foreman will then contact Stan Dean or  
25 Howard or somebody and say, "I've got a problem out here,

1 build a task for this employee. I want him to go out there  
2 and work on it and build a trouble report on this customer  
3 for him to go out there."

4 Q And when they build a trouble report that's  
5 entering it into LMOS?

6 A Yes, right.

7 Q Have you ever had any instances where a service  
8 tech, for example, carries a beeper and they'll call his  
9 beeper number directly?

10 A I've heard of customers doing it and I'm sure it's  
11 being done, you know, but that's not the way to do it because  
12 we have to know what those people are doing too, and if  
13 they're going out there on their own -- first of all, it  
14 takes management approval to build a task or to build a  
15 trouble report and he can't do it by himself, so he needs to  
16 get his boss involved.

17 There are some customers out there, and especially  
18 in these small towns, where the guy not only fixes his phone,  
19 he's on a rotary with them, he goes to church with them, you  
20 know, he plays golf with them. Yes, they've got their page  
21 number and they page them up direct, I think, sometimes.

22 Q In a situation like that, would that avoid any  
23 record of any transaction if a guy, say, swings by to check a  
24 problem?

25 A I would hope not. I would hope -- well, first of

1 all, they're task oriented and their production is in there  
2 and they want us to give them credit and the only way they  
3 can get credit is to build a trouble report.

4 Q Are you aware of any instances where they actually  
5 have done something like that and a trouble report was not  
6 created?

7 A No.

8 Q Is there any way that you can exclude a trouble  
9 report before it gets to LMOS, before it's actually entered  
10 into LMOS?

11 A No. Because if it's -- well, the only way you can  
12 include it is if you write it on a piece of paper and throw  
13 the piece of paper away. But, no, once somebody puts  
14 something in LMOS, like I said, unless the machine hiccups it  
15 out, then it's there.

16 MR. HATCH: That's all I've got.

17 MR. LACKEY: Thank you, sir.

18 (Witness excused)

19 (Whereupon, at 11:10 o'clock a.m., the deposition  
20 was concluded.)  
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AFFIDAVIT OF DEPONENT

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This is to certify that I, RICHARD PHILLIP COLLAMATI, have read the foregoing transcription of my testimony, Page 6 through 32, given on July 30, 1992, in Docket No. 910163-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

\_\_\_\_\_  
RICHARD PHILLIP COLLAMATI

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

\_\_\_\_\_  
NOTARY PUBLIC  
State of \_\_\_\_\_  
My Commission Expires:



1  
2  
3  
4 F L O R I D A )  
5 COUNTY OF CLAY)

6  
7 I, the undersigned authority, certify that  
8 Richard Phillip Collamati personally appeared before me and  
9 was duly sworn.

10  
11 WITNESS my hand and official seal this 15<sup>th</sup> day  
12 of October, 1993.

13  
14 Marie C. Gentry  
15 MARIE C. GENTRY  
16 Notary Public - State of Florida  
17 My Commission No. CC251746  
18 Expires: January 21, 1997

19 OFFICIAL NOTARY SEAL  
20 MARIE C GENTRY  
21 NOTARY PUBLIC STATE OF FLORIDA  
22 COMMISSION NO. CC251746  
23 MY COMMISSION EXP. JAN. 21, 1997  
24  
25

1 STATE OF FLORIDA)  
2 COUNTY OF CLAY )

CERTIFICATE OF REPORTER

3 I, Marie C. Gentry, Court Reporter,  
4 DO HEREBY CERTIFY that I was authorized to and did  
5 stenographically report the foregoing deposition of RICHARD  
6 PHILLIP COLLAMATI;

7 I FURTHER CERTIFY that this transcript, consisting  
8 of 35 pages, constitutes a true record of the testimony given  
9 by the witness.

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

15 DATED this 1st day of October, 1993.

16 Marie C. Gentry  
17 Marie C. Gentry  
18 Court Reporter  
19 Telephone No. (904) 264-2943

20 STATE OF FLORIDA)  
21 COUNTY OF CLAY )

22 The foregoing certificate was acknowledged before  
23 me this 1st day of October, 1993,  
24 by Marie C. Gentry, who is personally known to me.

25 Patricia H. Versiegel  
Notary Public, State of Florida at Large.

PATRICIA H. VERSIEGEL  
NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXPIRES 6/31/97  
COMM. # CC 236027



## Southern Bell

903 West University Avenue  
Gainesville, Florida 32601  
(904) 371-5920

Richard P. Collamati  
Manager - Distribution

November 18, 1988

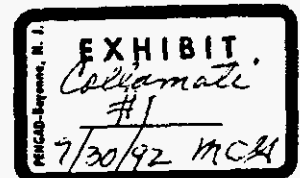
T. E. Jones  
Operations Manager-Network  
6026 N. W. 1st Place  
Gainesville, FL 32606

Dear Tom,

Per our conversation, listed below are the procedures we use to help meet our PSC objectives:

### Maintenance-Schedule 11 (OOS > 24 Hrs.)

- 1- Every attempt is made to keep OOS commitments under 24 hrs.
- 2- The ROSL (Review Out of Service List) is reviewed hourly and all those in jeopardy of being missed (1 hr.) are called to the attention of the work group involved. This helps insure that person is aware of the out of service commitment.
- 3- The appointment of all troubles reflected on the ROSL which are more than 24 hrs. out (originally service affecting commitment given and trouble found to be OOS by screening) are changed to under 24 hrs. This is accomplished using the TE (Trouble Entry) mask and making the trouble category CD (Customer Direct). This changes the commitment time in LMOS but not in MTAS. Therefore if we make the commitment we make the OOS > 24.
- 4- All employee reports are given a commitment time ending in a 9 (e.g. 11:59A, 4:59P, etc.). This helps us easily identify should a choice have to be made what trouble to dispatch on first.



- 5- The Load Control Supervisors constantly monitor task which affect the PSC reports via the DPVAL report (Display Value) and the DJI report (Display Job Information). This insures that the proper reports are next to go. They are backed up by the foreman responsible for service orders and one of the floor foremen.
- 6- Every MA has been informed prior to closing a trouble which will be OOS > 24. They are to get the approval of a foreman. This is to insure that until it becomes second nature the MA's are asking what time was the trouble cleared rather than using computer time.
- 7- Every OOS > 24 report which is received is investigated and all parties concerned are covered as to the reason.

#### Maintenance-Schedule 17 (Missed Appointments)

- 1- A clerk is assigned the duty of monitoring hourly, via the DPJ (Display Pending Job) report, all commitments. Those which are in jeopardy of going over, a valid attempt is made to contact the customer to notify them of the miss and to renegotiate the appointment. She then places the proper narrative on the trouble and places 222 in the special information field which excludes this from the PSC reports.

#### Installation-Schedule 2 (Service within 30 days)

- 1- Except during abnormal conditions (weather, school rush, etc.) all exchanges are kept on 2-day lights. This gives us the ability to have a third day should problems arise on a service order to still get it within the proper time frame.
- 2- As with maintenance the load is monitored to insure W (Firm Appointment) orders are dispatched prior to X and A appointed. This is done via the DPVAL and DJI transactions.
- 3- Care is being exercised in the miss code being placed to insure it is in fact a company miss and is coded properly.
- 4- All orders not properly appointed are referred to the business office for proper issuance (X appointed as opposed to W appointed). This is done by monitoring the daily S&R service order list.

Installation-Schedule 18 (Missed Appointments)

- 1- As with maintenance the load is monitored to insure proper dispatching is being done. (AM service orders prior to PM service orders.) This is tracked via the DPJ and DPVAL reports by the Load Control Foreman backed up by the ICC Foreman.

The above mentioned procedures are not new to us and we are doing all in our ability to meet all PSC requirements.

Mr. Tubaugh and Mr. Jenkins have been very helpful in making sure the outside personnel are committed to the PSC results. I would like to commend their effort and we all realize we can not relax our vigilance for one moment.

Should you require more information please let me know.



R. P. Collamati  
Manager-CSCC

