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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

920260-TL

DOCKET NO. 910163-TL

FILED: June 11, 1993

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

CERTIFIED COPY
Williams & Hahn

Pompano Beach, Florida

June 22, 1993

3:35 o'clock p.m.

* * *

DEPOSITION

OF

WILLIAM FARBARIK

* * *

DOCUMENT NUMBER-DATE

09497 SEP-28

RECORDS/REPORTING

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Appearing on behalf of SOUTHERN BELL

I N D E X

WITNESS

WILLIAM FARBARIK

DIRECT

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1 Deposition of WILLIAM FARBARIK, a witness of
2 lawful age, taken by the OFFICE OF THE PUBLIC COUNSEL, for
3 the purpose of discovery and for use as evidence in the
4 above-entitled matter, In re: Petition on behalf of
5 CITIZENS OF THE STATE OF FLORIDA to initiate investigation
6 into integrity of SOUTHERN BELL TELEPHONE & TELEGRAPH
7 COMPANY'S repair service activities and reports, pending
8 before the FLORIDA PUBLIC SERVICE COMMISSION in and for
9 the State of Florida, pursuant to notice heretofore filed,
10 before CHRISTINE A. AMAN CANNON, a Notary Public in and
11 for the State of Florida at Large, Southern Bell Telephone
12 & Telegraph Company, 1230 North Federal Highway, in the
13 City of Pompano Beach, County of Broward, State of
14 Florida, on the 22nd day of June, 1993, commencing at 3:35
15 o'clock p.m.

16 * * *

17 Thereupon:

18 WILLIAM FARBARIK

19 a witness of lawful age, being called as a witness by the
20 Florida Public Service Commission, having been first duly
21 sworn, testified under oath as follows:

22 DIRECT EXAMINATION

23 BY MS. RICHARDSON:

24 Q. Would you state your name and spell it for the
25 court reporter.

1 A. My first name is William. My last name is
2 Farbarik, F-A-R-B-A-R-I-K.

3 Q. Your address please.

4 A. 6224 -- 6451 North Federal Highway, I'm sorry.
5 Room 1016.

6 Q. Is that Fort Lauderdale?

7 A. Yes.

8 Q. Do you have a zip code for that?

9 A. 33308.

10 Q. Is that a business address?

11 A. Yes.

12 Q. Do you have a phone number?

13 A. 492-2804.

14 Q. Is that your business phone?

15 A. Yes.

16 Q. Are you represented by an attorney here today?

17 A. No, I'm not.

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

20 A. No, I haven't.

21 Q. Has anyone advised you that you would not be
22 disciplined based upon anything that you tell us here
23 today?

24 A. Yes.

25 Q. Have you given a statement to the company in the

1 past?

2 A. Yes.

3 Q. Do you remember when that was?

4 A. No, I don't.

5 Q. Was it a year ago or less than or --

6 A. It was probably two years ago.

7 Q. Do you know where you gave it?

8 A. Yeah, at 6451 North Federal Highway.

9 Q. Who was present in the room when you made your
10 statement?

11 A. Security man, Larry Meeker.

12 Q. Was there an attorney present?

13 A. Yes, I think there was.

14 Q. Was your supervisor present?

15 A. No.

16 Q. Was there anyone else besides the security
17 person?

18 A. No.

19 Q. Did you discuss your statement with anybody?

20 A. No.

21 Q. Has anyone advised you of the possible criminal
22 penalties that could apply if you perjure your testimony
23 here today?

24 A. No.

25 Q. If at any point I ask you a question that you

1 don't understand or you're not quite clear on what I'm
2 asking, I'll be glad to rephrase it and try to work with
3 you on that. And if at any point you need to stop and ask
4 Mr. Beatty a question and go off the record, we can do
5 that too. Is that okay with you?

6 A. Sure.

7 Q. What is your position Mr. Farbarik?

8 A. I'm a staff manager.

9 Q. Is that a first level, second level?

10 A. Second level.

11 Q. Where -- I guess you're at the Fort Lauderdale
12 the business address you gave me?

13 A. Yes.

14 Q. How long have you held that position?

15 A. Going on six years, seven years.

16 Q. Has that entire time been at the Fort Lauderdale
17 address?

18 A. Yes.

19 Q. What did you do before you were a second level
20 with Fort Lauderdale?

21 A. I was a second level in the Hollywood maintenance
22 center.

23 Q. How many years were you in Hollywood?

24 A. I can't remember. I don't remember. It's been
25 probably -- I know five years there at least.

1 Q. Were you doing the same thing in Hollywood that
2 you're now doing in Fort Lauderdale?

3 A. No.

4 Q. Briefly tell me what your responsibilities are
5 right now.

6 A. I'm a data base manager. I deal in impute,
7 output which is service orders and trouble reports that
8 come in with errors on them. A group of people over in
9 the assignment center correct the errors and if cables are
10 moved, for example, cable thirty turns into cable one, I
11 generate the information that changes them automatically
12 through the computer.

13 Q. Would your responsibilities deal at all with
14 mismatch cable pairs?

15 A. What do you mean by mismatch cable pairs?

16 Q. Probably not what I'm thinking. Let me see if I
17 can make it more of a layman's term question. If a
18 customer's line got crossed with someone else's line,
19 would that be part of your duties?

20 A. No. I deal with bulk cable, bulk, entire cable
21 changing them for throws and things.

22 Q. Is any part of your responsibility in Fort
23 Lauderdale dealing with customer trouble records, repair
24 records?

25 A. I use repair records to verify things is all. I

1 don't -- Well, I don't change records. I can change
2 addresses but I don't change cable pairs. I basically
3 verify, for example -- Let me give you an example.

4 If a trouble comes -- If a trouble comes up or a
5 telephone number comes up on the 911 file, okay, then I
6 usually look at that telephone number to determine what is
7 wrong -- if there's something wrong with it.

8 And it could very well be that it shows it in
9 wire center 208 and it should be in or it shows the areal
10 site is in 208 and the underground site is in 930, then it
11 would come up as an error. And then myself or my people
12 can go in and change whichever is incorrect wire center to
13 the correct wire center to match so it flows through.

14 Q. When you say they can change, you mean in the
15 computer system?

16 A. Yes.

17 Q. When you were in Hollywood --

18 A. Uh-huh, seven years ago.

19 Q. -- What were your responsibilities?

20 A. I was in charge of the maintenance center.

21 Q. What did that involve?

22 A. Everything that has to do with the maintenance
23 center.

24 Q. Did you supervise maintenance administrators?

25 A. Yes. Clerks.

1 Q. Did you supervise service technicians?

2 A. No.

3 Q. In the supervision of maintenance administrators,
4 was part of your responsibility to oversee the closing of
5 customer trouble records?

6 A. Yes.

7 Q. Did you deal with residence and business records?

8 A. Yes.

9 Q. Did you also deal with service orders?

10 A. Yes.

11 Q. Were you a first level manager before you became
12 a second level manager?

13 A. Yes.

14 Q. Where were you a first level manager?

15 A. In the business office.

16 Q. What did you do there?

17 A. I supervised service reps.

18 Q. How long did you hold that position?

19 A. I don't remember. I've got thirty-six years with
20 the company.

21 Q. That's quite a record.

22 A. Yeah.

23 Q. In terms of your supervision of service
24 representatives, can you give me some idea of exactly what
25 your duties were with that?

1 A. Make sure they issued orders properly, make sure
2 they talk nice to the customers, make sure that the
3 customer got what they asked for, basically that was it.
4 Collections too, I had clerks making sure we collected the
5 money that was owed to us.

6 Q. Did you also have any responsibility for training
7 in sales?

8 A. No.

9 Q. Did your service reps do selling?

10 A. Yes.

11 Q. Did you have any quotas, monetary quotas placed
12 on you?

13 A. No, not at that time. That was way back.

14 Q. Was that before divestiture?

15 A. Yeah. Way, way, way back, yeah. My most first
16 level job was probably I had -- Let me think back a
17 minute. I had a crew in Fort Lauderdale.

18 Q. When was that?

19 A. It was fifteen years ago.

20 Q. Was that an outside crew?

21 A. Yes.

22 Q. Did they do residence and business?

23 A. Yes.

24 Q. I think what I would like to do is maybe just
25 focus in right now on your experience in the Hollywood

1 maintenance center when you were supervising the
2 processing of customer trouble records.

3 I think what I'm going to do is show you a
4 document. This one is -- Let me introduce it for the
5 record first. This is Southern Bell's response to
6 preliminary order number PSC-93-0263-PCO-TL entered on
7 February 19, 1993. And it was filed by the company with
8 the commission on their rate case docket on April 15, 1993.
9 And there's a William H. Farbarik at number one sixty.

10 A. That's me.

11 Q. Have you seen this document yet?

12 A. Uh-huh.

13 Q. And there's some numbers after your name.

14 A. Uh-huh.

15 Q. I'd like to ask you about some of those. One of
16 the numbers after your name I believe is number eight and
17 that has something to do -- that you may have some
18 information about instructions not to status
19 out-of-service or not statusing out-of-service or both.
20 Now, I'm wondering what you can tell me about that if
21 anything.

22 MR. BEATTY: If anything.

23 A. When I was on my staff job?

24 Q. Yes.

25 A. Or when I was in Hollywood?

1 Q. At any point.

2 A. Okay. When I -- I can't tell you anything about
3 it in Hollywood because we just statused the way we were
4 suppose to status. However, when we did a review in
5 --right here, this maintenance center.

6 Q. Pompano or Fort Lauderdale?

7 A. Right here.

8 Q. Okay, in Pompano.

9 A. North Broward. And I found little stickers on
10 the tube that says do not status OOS.

11 Q. When you say on the tube, is that the data screen
12 for the computer?

13 A. Yeah. The screen the girls work with.

14 Q. What did you do when you found that on the
15 screen?

16 A. Took it off and I gave it to my boss.

17 Q. Who's your boss?

18 A. At the time it was R.R. Rupe.

19 Q. What is Mr. Rupe's first name?

20 A. Robert R. Rupe.

21 Q. Do you know what Mr. Rupe did about it?

22 A. I haven't the slightest idea. Other than a
23 meeting in this room, he raised a lot of Cain about it.

24 Q. In your opinion based on your experience with the
25 company was that proper to have that sticker instruction?

1 A. I don't know.

2 Q. Do you know if Mr. Rupe felt that it was proper?

3 A. I don't know.

4 Q. Were you present at that meeting?

5 A. Yes, I was.

6 Q. Can you recall what he told the individuals?

7 A. No. I don't remember. I know he got excited.

8 And he mentioned it and then I don't know what happened to
9 it.

10 Q. Who was present at that meeting with Mr. Rupe?

11 A. Diana Allen, Joe James, Sattizahn, Beck, George
12 Mainer and the local foreman.

13 Q. Was that meeting called by Mr. Rupe?

14 A. It was a feedback for the review we were doing.
15 I don't know who it was called by.

16 Q. In that particular session do you recall if Mr.
17 Rupe when he was raising Cain indicated that he felt that
18 the little stickers were proper or improper?

19 A. I don't remember. I really don't. I really
20 don't.

21 Q. Do you recall any conversation or discussion
22 among the other people that were present?

23 A. No.

24 Q. When you did that review, did you come back and
25 do a re-review of Pompano at that time?

1 A. I didn't.

2 Q. Do you know if anyone else did?

3 A. I don't know.

4 Q. Do you recall any discussion as to why the
5 stickers were on the machine?

6 A. No.

7 Q. By your name is number eleven on this sheet also.
8 And number eleven indicates that you might have some
9 information about improper preparation of trouble reports
10 or improper activity generally.

11 A

12 Q. I'm wondering what you could tell me about that.

13 A.

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Q. Were any employee codes on these reports?

A. I don't know. Oh, employees?

Q. Employee codes on those reports.

A. Yeah but I don't know whose they were. It's too long ago.

Q. Did you ever find out why?

A. I never talked to the man. I'd probably kill him if I got my hands on him.

Q. Are you aware of the company's requirement that out-of-service reports be completed within twenty-four hours?

A. Yeah. They were, yeah.

Q. Are you aware that the Public Service Commission requires the company to repair at least ninety-five

1 percent of out-of-service within twenty-four hours?

2 A. Yeah.

3 Q. Do you know whether or not any special services,
4 those that were being excluded to help with the
5 out-of-service over twenty-four?

6 MR. BEATTY: I'm sorry. Can you repeat that
7 question.

8 Q. Do you know if in this instance of excluding the
9 special services reports that you talked about if that was
10 being done to help meet that out-of-service over
11 twenty-four index?

12 A. No. I don't think so. The special services had
13 its own index of by like five hours, and he was probably
14 trying to meet that. I don't know what he was doing. I
15 don't know, absolutely not.

16 Q. Did you say that these were no access -- before
17 you began excluding them that they would be no access?

18 A. I said that normally when you get them, okay, we
19 tracked them. For quite some time I tracked them. And
20 you would get them late in the day. And by the time you
21 get a man out there to fix the trouble, the business would
22 be closed. Okay. So then you would no access it and
23 you'd send it back out on the next day.

24 Q. So I want to make sure that I'm clear. A special
25 service report is a major business customer?

1 A. Uh-huh.

2 Q. So that's different than handling just a small
3 business with one or two lines?

4 A. Yes.

5 Q. And the major customers have a much shorter time
6 frame --

7 A. Absolutely.

8 Q. -- of about five hours?

9 A. Yeah.

10 Q. Do you know if the Public Service Commission
11 requires that short time frame?

12 A. I don't know but I know we did.

13 Q. Do you know of any other improper preparation of
14 trouble reports related to customer and small business?

15 A. Unh-unh.

16 Q. Number seventeen is by your name also. And that
17 says you might have some information about intimidation or
18 pressure.

19 A. Yes.

20 Q. And I'm wondering what you might be able to tell
21 me about that.

22 A. I was in my office one day in Hollywood. And it
23 had been raining for a couple of days. And the phone rang
24 and as on the phone talking directly
25 to me which he normally doesn't do.

1 However, he said to me, you have a lot of
2 out-of-services. And I said yes sir, I know it. He said,
3 is there anything you can do about it. I said no, sir.
4 He says well, you know -- He says sometimes people have to
5 do things that they may not want to do.

6 And I said to him, said, are you
7 asking me to cheat and he hung up. I reported it to Mr.
8 Christian my manager and I don't know whatever came of it.

9 Q.

10 A. Yes.

11 Q. And Mr. Christian, is that Mr. Rudy Christian?

12 A. Sure.

13 Q. Were you ever disciplined for having too many
14 out-of-services?

15 A. Absolutely not.

16 Q. Did Mr. Christian make any comments to you when
17 you reported it?

18 A. No.

19 Q. In terms of your discussion with about
20 this, did you get any impression as to why he was making
21 those suggestions?

22 A. I don't know. I don't know.

23 Q. By your name is also number twenty-two and that
24 says, wet and dry rules. What are wet and dry rules?

25 A. Well, the dry rules were the ones when the sun

1 was shining and the wet rules were the ones when it was
2 raining. We rarely ever used wet rules. In fact, I never
3 used them in Hollywood. I only used dry rules. And other
4 than that I can't tell you a thing about rules.

5 Q. Were these for the autoscreener?

6 A. Yes.

7 Q. Does autoscreener automatically status
8 out-of-service and not out-of-service on the reports?

9 A. Does it automatically --

10 Q. Status out-of-service or not out-of-service on
11 trouble reports?

12 A. Does now.

13 Q. Did it then?

14 A. No. Only if it was -- Only if it was told to do
15 so.

16 Q. On what occasions would it be -- would
17 autoscreener be given directions to status out-of-service?

18 A. It's been so long since I've been into this
19 business.

20 MR. BEATTY: As best you can recall.

21 A. Well, if a cable got cut, it would status them
22 all out-of-service. If a drop wire came down and was cut,
23 it would status it out-of-service. That's all I can think
24 of.

25 Q. Do you know of any instances where the

1 autoscreener rules were changed to avoid statusing
2 out-of-service?

3 A. No. Ours were set by the way the staff at the
4 time told us to set them and nobody touched them. And if
5 they ever came up with a new one or if they come up with a
6 change, it would go out in a letter and then we would do
7 accordingly and that's it.

8 Q. Have you heard of any other maintenance centers
9 using the autoscreener rules to manipulate their
10 out-of-service over twenty-four hour result?

11 A. No.

12 Q. By your name is number twenty-four. It says
13 special services or special circuits. Other than what
14 we've already discussed, is there anything about special
15 services or special circuits that you know of?

16 A. No.

17 Q. Who is your present manager?

18 A. Ken Szymczak.

19 Q. Can you spell that.

20 A. S-Z-Y-M-C-Z-A-K.

21 Q. Can you tell me who your manager was when you
22 were in Hollywood?

23 A. When I left Hollywood was Bob Rey.

24 Q. And that's R-A-Y?

25 A. R-E-Y, I think.

1 Q. Was Mr. Rey your manager the entire time in
2 Hollywood?

3 A. No.

4 Q. Who else did you have?

5 A. Jack Knight, he died. Rudy Christian. That's
6 it.

7 Q. Do you know of any instances where managers have
8 directed maintenance administrators to contact them and
9 get permission to close out out-of-service reports when
10 they're about to go out over twenty-four hours?

11 A. No.

12 Q. Do you know of any instances of any employees
13 backing up a clearing time on a trouble report?

14 A. Yes. Sure.

15 Q. Can you tell me about that.

16 A. If a guy was like working through his lunch hour.
17 For example, say he finished the trouble at 12:30. He
18 went to lunch from 12:30 to 1:30. He had maybe thirty
19 minutes more worth of routine work to do. He would call
20 in and he'd say I cleared the trouble at 12:30 or whenever
21 it was back and they would back the clock up. That's the
22 only way that I know of that they did it.

23 Q. So let me just ask it a different way. Do you
24 know of anyone who has reported a clearing time other than
25 the actual service restoral time?

1 A. I don't know of anyone.

2 Q. Are you familiar with the no access code?

3 A. Other than when you go out there and they're not
4 home, you no access it. That's all I know about it.

5 Q. Do you know if that no access code stops that
6 twenty-four hour clock on an out-of-service?

7 A. I don't think it did but I'm not sure. I don't
8 think it does though.

9 Q. Do you know of anybody who no accessed a report
10 without dispatching?

11 A. No.

12 Q. Do you know of anyone who no accessed a report
13 when the customer really was there?

14 A. No. I'd string them up.

15 Q. Are you familiar with the CON code?

16 A. Yeah. That was for futures way out.

17 Q. Do you know of anyone who has misused the CON
18 code?

19 A. I don't know personally of anybody, no.

20 Q. Do you know of anyone who has taken an
21 out-of-service report that's about to go out over
22 twenty-four hours, close it, and then reopen it as an
23 employee originated report to complete the repair?

24 A. (The witness nodding in the negative.)

25 Q. That's a no?

1 A. That's a no. Absolutely no.

2 Q. She has trouble with shaking your head.

3 A. I'm sorry.

4 Q. That's all right. Do you know what a test okay
5 is?

6 A. Uh-huh.

7 Q. Can you generally tell me what a test okay is.

8 A. If the service is clear, it's test okay. And you
9 pick it up and call the customer, and you talk to them and
10 they talk to you. It's test okay.

11 Q. Based on your training and experience, is it
12 proper to take a test okay and close it out as an
13 out-of-service?

14 A. Yeah. There could be occasions when they would
15 do that. I can't remember offhand what they are but there
16 are one or two of them. Probably if the customer reported
17 the trouble as out-of-service.

18 And maybe it was an ROH, receiver off the hook.
19 And in the meantime while it was processing and they found
20 it and they put it back on and you could call them, it
21 would come through as an out-of-service but it would be a
22 test okay because they put it back on the hook. That's
23 the only thing I can think of.

24 Q. But it was statused up front as an out-of-service
25 and then closed out as a tested okay?

1 A. Right.

2 Q. Would it be proper to take a report that was a
3 test okay report -- After you contacted a customer, it was
4 test okay -- take those reports and close them out as
5 out-of-service?

6 A. Absolutely not.

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

8 A. No.

9 Q. Do you know of anyone who has taken reports that
10 were not out-of-service and restated them on close out
11 as out-of-service?

12 A. No.

13 Q. Have you ever heard of "building the base"?

14 A. Yeah. I've heard of it. I've never done it but
15 I've heard of it.

16 Q. What does that mean to you?

17 A. That would probably mean if you take a bunch of
18 troubles because you're low on out-of-services and make
19 them out-of-service to build your base up so that some
20 other index looks good but I've never done it.

21 Q. Do you know of anyone that has?

22 A. I don't know.

23 Q. Are you familiar with disposition and cause
24 codes?

25 A. Not that familiar with them.

1 Q. Can you generally tell me what a disposition code
2 is?

3 A. No. I really can't.

4 Q. Do you know if there were ever at any point with
5 the company certain disposition and cause codes that would
6 keep an out-of-service from being counted against the
7 company if it went over twenty-four hours?

8 A. I don't know.

9 Q. Do you know of anyone who has put false
10 information on a customer trouble report?

11 A. No.

12 Q. Do you know of any improper activities generally
13 that you haven't already told me about?

14 A. No. Just what I've told you.

15 Q. Other than the discipline that you had mentioned
16 previously, have you received any other discipline related
17 to your handling or management of customer trouble
18 reports?

19 A. No, that was enough.

20 Q. Has anyone to your knowledge filed a grievance
21 against managers for instructions they've received in
22 handling trouble reports?

23 A. Say that again please.

24 Q. Do you know of anyone who has filed a grievance
25 against a manager because of the way that manager has

1 supervised them in processing customer trouble reports?

2 A. Do you mean that the manager was processing the
3 reports or--

4 Q. All right. Let's take that as an example.

5 A. Well, we used to always get grievances from craft
6 people saying that managers were doing craft work but that
7 wasn't necessarily true. That was in their eyes and their
8 interpretation of it.

9 Q. Do you know of any grievances craft has filed,
10 any craft has filed against a manager because of specific
11 instructions that manager gave them in processing a
12 trouble report that the craft felt was wrong?

13 A. No.

14 Q. Have you ever participated in any of the sales
15 campaigns that the company has ran?

16 A. No.

17 Q. Have you supervised any people who did
18 participate in the sales?

19 A. No. That was outside dealings. That had nothing
20 to do with inside whatsoever.

21 Q. Do you know of anyone who has recorded a sale of
22 a service or product to a customer that the customer did
23 not order?

24 A. No.

25 Q. Okay Mr. Farbarik, I think I'm through. There

1 maybe some questions from the end of the table but I want
2 to thank you for coming. I appreciate it.

3 MR. VINSON: Mr. Farbarik, I have one quick
4 question for you. In the discussion where
5 called you on the phone and there was a rainy period
6 with a lot of out-of-service troubles. Can you put a
7 approximate time frame on that?

8 THE WITNESS: Probably -- It was probably six
9 years ago. Well, no. It would be twelve years ago
10 now since I've been on staff six. Six years before we
11 went to staff probably about ten or twelve.

12 MR. VINSON: Thank you.

13 MR. GREER: I have a couple. You talked about in
14 Hollywood a foreman excluding special service
15 circuits. Who was that foreman?

16 THE WITNESS: Let me say this, I don't
17 know as a fact that he instructed this to be done. He
18 was on the weekend that it was done.

19 MR. GREER: And he is the person that asked you
20 about excluding those types of troubles?

21 THE WITNESS: Yes.

22 MR. GREER: Ms. Richardson asked you about wet
23 and dry rules. What was the company's policy on the
24 use of wet and dry rules if you know?

25 THE WITNESS: I really don't remember. I know

1 that we used the dry rules all the time and rarely
2 ever went to the wet rules simply because there's -- I
3 don't know really why we didn't. I guess I figured
4 one set of rules was enough. That's all we used. And
5 I had a foreman that administered the rules. So I
6 wasn't really that involved with that.

7 MR. GREER: So you don't know what the reason was
8 for the wet and dry rules or do you?

9 THE WITNESS: No. Well, yeah. The wet rules
10 were if it rained and troubles that had just a little
11 bit of battery on them would come up okay. And when
12 you put the wet rules in, it took a little more
13 battery before they would come up.

14 In other words, instead of having one hundred
15 thousand troubles, you would have fewer troubles
16 because a little bit of battery wouldn't effect the
17 use of the telephone but it would be a trouble anyhow.
18 And we would be chasing people on things that really
19 weren't solid troubles like out-of-service.

20 MR. GREER: So the wet rules made the criteria
21 for being an out-of-service trouble different?

22 THE WITNESS: No. I don't know anything about
23 it. Let me put it that way. I really don't.

24 MR. VINSON: Mr. Farbarik, I have a couple more
25 questions. Regarding the incident where you found the

1 stickers on the terminals and turned them over to Mr.
2 Rupe. Can you put a time frame on that?

3 THE WITNESS: About eight years ago.

4 MR. VINSON: You mentioned --

5 THE WITNESS: No. I'm sorry. That's about --
6 That's right when I first came up here. That's about
7 six years ago.

8 MR. VINSON: And you mentioned that there was a
9 feedback meeting for review. The meeting where Mr.
10 Rupe raised Cain so to speak, was that that feedback
11 meeting?

12 THE WITNESS: He was there, yes.

13 MR. VINSON: That was the feedback meeting?

14 THE WITNESS: Yes.

15 MR. VINSON: Who conducted that review? Who was
16 the reviewer?

17 THE WITNESS: Rupe. Well, there were a bunch
18 of us from the staff that did the review. Rupe was
19 in charge of it. He was my boss. Sattizahn was the
20 district level for the district that we reviewed.

21 MR. VINSON: So Mr. Rupe was on the network
22 support staff at that time?

23 THE WITNESS: Yes.

24 MR. VINSON: That's all the questions I have.

25 MR. GREER: I have one more. I believe you said

1 that you have not directly -- did not have direct
2 knowledge as to any misuse of CON status codes?

3 THE WITNESS: Right.

4 MR. GREER: Have you heard of any misuse of the
5 CON status code?

6 THE WITNESS: Yeah. I've heard rumor but I don't
7 know where it was or who said it. I heard that people
8 were using it in a way to -- I don't know what they
9 were trying -- I don't really know what they were
10 trying to do with it but I know that they said they
11 were using it in a bad way using -- because it puts
12 the date out. I guess it didn't track time. I don't
13 know. I never used it. I never got involved in that
14 kind of stuff.

15 MR. GREER: Okay. That's all I have.

16 MR. BEATTY: Thank you.

17 (Whereupon, the deposition was
18 concluded at 4:15 o'clock p.m.)

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STATE OF FLORIDA)
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COUNTY OF BROWARD)

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Witness

SWORN to and SUBSCRIBED before me this
_____ day of _____, 1993, in the
City of Fort Lauderdale, County of
Broward, State of Florida.

Notary Public,
State of Florida at Large

My Commission Expires:

