

ORIGINAL

DOCKET NO. 951232-TI [Telecommunications Services, Inc.]

**WITNESS: Direct Testimony of Mary Jo Daurio, Appearing on Behalf of Respondent,
Telecommunications Services, Inc., as an adverse witness.**

DATE FILED: June 15, 1998

DOCUMENT NUMBER-DATE

06707 JUN 25 88

FPSC-RECORDS/REPORTING

IN THE CIRCUIT COURT OF THE ELEVENTH
JUDICIAL CIRCUIT IN AND FOR
DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 92-11654 CA 11

TRANSCALL AMERICA, INC., A GEORGIA
CORPORATION D/B/A ATC,

PLAINTIFF/COUNTER DEFENDANT,

VS.

TELECOMMUNICATIONS SERVICES, INC.,
A FLORIDA CORPORATION,

DEFENDANT/COUNTER PLAINTIFF/
THIRD PARTY PLAINTIFF.

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TELECOMMUNICATIONS SERVICES, INC.,
A FLORIDA CORPORATION,

COUNTER PLAINTIFF/THIRD
PARTY PLAINTIFF,

VS.

TRANSCALL AMERICA, INC., A GEORGIA
CORPORATION, AND ADVANCED
TELECOMMUNICATIONS CORP., A DELAWARE
CORPORATION,

COUNTER DEFENDANT/THIRD
PARTY DEFENDANT.

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200 MIAMI CENTER
201 SOUTH BISCAYNE BOULEVARD
MIAMI, FLORIDA
WEDNESDAY, AUGUST 24, 1994
9:44 A.M.

DEPOSITION OF MARY JO DAURIO

TAKEN BEFORE MARSHALL GARBETT, SHORTHAND
REPORTER AND NOTARY PUBLIC IN AND FOR THE STATE OF
FLORIDA AT LARGE, PURSUANT TO NOTICE OF TAKING
DEPOSITION IN THE ABOVE CAUSE.

ORIGINAL

- A P P E A R A N C E S -

ON BEHALF OF THE PLAINTIFF

MESSER, VICKERS, CAPARELLO, MADSEN & GOLDMAN, P.A.
215 SOUTH MONROE STREET, SUITE 701
TALLAHASSEE, FLORIDA 32302
BY: JAMES ELLIOTT MESSER, ESQ.
AND FLOYD R. SELF, ESQ.

ON BEHALF OF THE DEFENDANT

KIRKPATRICK & LOCKHART
2000 MIAMI CENTER
201 SOUTH BISCAYNE BOULEVARD
MIAMI, FLORIDA 33131
BY: DENNIS A. NOWAK, ESQ.
AND PATRICIA MARIBONA, ESQ.

ALSO PRESENT: JOEL ESQUENAZI

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- I N D E X -

<u>WITNESS</u>	<u>DIRECT</u>	<u>VOIR DIRE</u>	<u>REDIRECT</u>	<u>CROSS</u>
MARY JO DAURIO				
BY MR. NOWAK	4, 47		143	
BY MR. MESSER		46		138

- E X H I B I T S -

<u>DEFENDANT'S</u>	<u>FOR IDENTIFICATION</u>
1.....	7
2.....	41
3.....	42
4.....	43
5.....	46
6.....	48
7.....	48

- E X H I B I T S -

DEFENDANT'S

FOR IDENTIFICATION

8.....	50
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42.....	128
43.....	130

1 THEREUPON--

2 MARY JO DAURIO
3 WAS CALLED AS A WITNESS BY THE DEFENDANT, AND, AFTER
4 HAVING BEEN FIRST DULY SWORN, WAS EXAMINED AND
5 TESTIFIED AS FOLLOWS:

6 DIRECT EXAMINATION

7 BY MR. NOWAK:

8 Q. WOULD YOU PLEASE STATE YOUR NAME.

9 A. MARY JO DAURIO.

10 Q. SPELL YOUR LAST NAME.

11 A. D-A-U-R-I-O.

12 Q. AND WHERE DO YOU RESIDE?

13 A. 4600 SEAGRAPE DRIVE,

14 LAUDERDALE-BY-THE-SEA.

15 Q. THAT'S IN BROWARD COUNTY?

16 A. YES, IT IS.

17 Q. HAVE YOU EVER HAD YOUR DEPOSITION TAKEN
18 BEFORE?

19 A. NO, I HAVE NOT.

20 Q. LET ME GO OVER SOME GROUND RULES WITH
21 YOU. I AM A LAWYER REPRESENTING TSI,
22 TELECOMMUNICATIONS SERVICES, INC., WHICH IS A PARTY
23 TO A LAWSUIT BROUGHT BY TRANSCALL AMERICA, INC.,
24 ANOTHER COMPANY, AND I WILL BE ASKING YOU QUESTIONS
25 ABOUT ISSUES THAT HAVE ARISEN IN THAT LAWSUIT.

1 IF YOU DON'T UNDERSTAND A QUESTION THAT I
2 HAVE ASKED YOU, PLEASE FEEL FREE TO ASK ME TO CLARIFY
3 IT IN ANY WAY THAT YOU FEEL APPROPRIATE. BECAUSE IF
4 I ASK YOU A QUESTION AND YOU GIVE AN ANSWER, THEN
5 WHEN THIS IS TYPED UP, THE PERSON READING IT WILL
6 ASSUME THAT THE ANSWER YOU GAVE IS TO THE QUESTION I
7 ASKED. DO YOU UNDERSTAND?

8 A. YES. I DO.

9 Q. ANOTHER IMPORTANT RULE, YOU HAVE TO GIVE
10 VERBAL ANSWERS TO QUESTIONS. AND BY VERBAL ANSWERS I
11 MEAN SPECIFIC VERBAL ANSWERS. NOT JUST SOUNDS. SO,
12 FOR EXAMPLE, IF I ASK YOU A QUESTION AND AN ANSWER IS
13 YES, YOU SHOULD SAY YES, NOT UH-HUH. IF YOU SAY
14 UH-HUH IT MY BE UNDERSTOOD AS HUH-UH, AND IN THE
15 INTEREST OF CLARITY, EVERYBODY WANTS WHAT YOUR ANSWER
16 IS TO BE TRANSCRIBED. YOU UNDERSTAND?

17 A. YES, I UNDERSTAND.

18 Q. IF YOU DON'T KNOW THE ANSWER TO A
19 QUESTION, "I DON'T KNOW" IS A GOOD ANSWER. BECAUSE A
20 LOT OF PEOPLE THINK THEY KNOW WHAT THE ANSWER IS BUT
21 THEY ARE NOT SURE, AND IT'S KIND OF HUMAN NATURE TO
22 FILL IN THE BLANKS. RESIST THE IMPULSE TO DO THAT.
23 IF YOU DON'T KNOW, THAT'S FINE.

24 ANOTHER RULE IS THAT YOU ARE TESTIFYING
25 AS A DESIGNEE OF A CORPORATE ENTITY. MR. MESSER AND

1 MR. SELF REPRESENT THE CORPORATE ENTITY, AND IF THEY
2 DON'T LIKE A QUESTION I ASK, THEY'LL MAKE AN
3 APPROPRIATE OBJECTION. WAIT -- BEFORE YOU ANSWER,
4 WAIT FOR THEIR OBJECTION TO BE CONCLUDED, AND UNLESS
5 THEY INSTRUCT YOU NOT TO ANSWER THE QUESTION, THEN
6 YOU SHOULD ANSWER IT. OKAY?

7 A. OKAY.

8 MR. NOWAK: FIRST, YOU INDICATED
9 YESTERDAY, MR. MESSER, THAT MISS DAURIO WAS
10 GOING TO BE THE DESIGNEE TO THE NOTICE OF
11 TAKING DEPOSITION ON ALL TOPICS BUT FOR A
12 LIMITED PERIOD OF TIME, IS THAT CORRECT?

13 MR. MESSER: I CAN'T TELL YOU SHE HAS ALL
14 INFORMATION ON ALL TOPICS. I'M TELLING YOU
15 THAT WE HAVE PRESENTED THE PERSON WITH THE
16 MOST KNOWLEDGE BUT COVERING THE PERIOD OF TIME
17 IN WHICH SHE WAS IN CHARGE OF THE TSI ACCOUNT.

18 MR. NOWAK: CAN WE REACH AN UNDERSTANDING
19 AS TO WHAT THE PERIOD OF TIME SHE WILL BE
20 COVERING?

21 MR. MESSER: CERTAINLY. I SUGGEST YOU
22 ASK HER.

23 MR. NOWAK: OKAY, FINE.

24 BY MR. NOWAK:

25 Q. WE'LL BE COVERING THE PERIOD OF TIME FOR

1 WHICH SHE WAS EMPLOYED BY -- I GUESS I'M A LITTLE
2 UNCLEAR ON WHAT THE ENTITY SITUATION IS.

3 DO YOU KNOW WHAT PERIOD OF TIME THAT YOU
4 ARE COMFORTABLE TESTIFYING ABOUT?

5 A. YES, I DO.

6 Q. CAN YOU TELL ME WHAT THE PERIOD OF TIME
7 IS?

8 A. SPRING OF 1991. APRIL/MAY TIME FRAME.

9 Q. JUST THAT --

10 A. FROM 1989 UP UNTIL THAT POINT.

11 Q. FROM THE BEGINNING OF THE RELATIONSHIP
12 BETWEEN TSI AND TELUS?

13 A. SHORTLY THEREAFTER, BUT THEREAFTER.

14 Q. SHORTLY AFTER THE BEGINNING OF THE
15 RELATIONSHIP BETWEEN TSI AND TELUS UP UNTIL THE
16 SPRING OF 1991?

17 A. THAT'S CORRECT.

18 MR. NOWAK: THE FIRST ORDER OF
19 BUSINESS --

20 (THEREUPON, THE DOCUMENT REFERRED TO WAS
21 MARKED AS DEFENDANT'S EXHIBIT 1 FOR
22 IDENTIFICATION.)

23 MR. NOWAK: WHICH I'LL NOW SHOW TO
24 COUNSEL.

25 (PAUSE.)

1 MR. NOWAK: CAN WE STIPULATE WHAT'S BEEN
2 MARKED AS TSI DEPOSITION EXHIBIT NUMBER 1 IS
3 THE NOTICE OF TAKING OF DEPOSITION FOR WHICH
4 THIS WITNESS IS GOING TO BE RESPONDING?

5 MR. MESSER: YES.

6 BY MR. NOWAK:

7 Q. CAN YOU TELL ME WITH WHOM YOU ARE NOW
8 EMPLOYED?

9 A. LDDS COMMUNICATIONS.

10 Q. AND WHEN DID THAT EMPLOYMENT BEGIN?

11 A. I STARTED WORKING IN SEPTEMBER OF 1985
12 FOR A COMPANY CALLED LONG DISTANCE AMERICA, AND
13 THROUGH MERGERS AND ACQUISITIONS, IT'S NOW THE SAME
14 COMPANY KNOWN AS LDDS COMMUNICATIONS.

15 Q. WHAT WAS THE LAST MERGER AND ACQUISITION
16 THAT OCCURRED IN THE CHAIN?

17 A. ATC AND LDDS COMMUNICATIONS.

18 Q. AND BY ATC, YOU MEAN ADVANCED
19 TELECOMMUNICATIONS CORPORATION?

20 A. THAT'S CORRECT.

21 Q. AND APPROXIMATELY WHEN DID THAT OCCUR?
22 DO YOU REMEMBER?

23 A. IT WILL BE TWO YEARS THIS DECEMBER.

24 Q. SO THAT WOULD BE DECEMBER OF 1992,
25 CORRECT?

1 A. YES.

2 Q. AND WHAT ARE YOUR RESPONSIBILITIES AT
3 LDDS NOW?

4 A. I'M MANAGER OF THE ORDER PROCESSING
5 CENTER.

6 Q. AND WHAT DO YOU DO AS MANAGER OF THE
7 ORDER PROCESSING CENTER?

8 A. I SUPERVISE AND MANAGE SEVERAL DIFFERENT
9 WORK FUNCTIONS, INCLUDING THE PROCESSING OF NEW SALES
10 ORDERS FOR NEW CUSTOMERS TO THE FLORIDA AND GEORGIA
11 REGION. A GROUP CALLED SWITCH INPUT THAT TAKES
12 TELEPHONE NUMBERS OFF CODES, ON LINES AND ACTIVATES
13 THEM IN OUR SWITCHES. THE EQUAL ACCESS FUNCTION
14 WHICH IS THE PICKING OF A&I'S TO THE LDDS PIC CODE.

15 Q. WHAT WAS THE LAST BIT, WHAT WAS THAT
16 CALLED?

17 A. PIC.

18 Q. EQUAL ACCESS?

19 A. EQUAL ACCESS.

20 Q. AND YOU HAVE TO SLOW DOWN A LITTLE BIT ON
21 THAT ONE BECAUSE I DON'T UNDERSTAND WHAT THAT IS.

22 A. EQUAL ACCESS PROCESSING IS WHERE A
23 CUSTOMER PICKS UP A PHONE AND DIALS ONE PLUS THE
24 NUMBER. EQUAL ACCESS IS WHERE WE TRANSMIT THOSE
25 TELEPHONE NUMBERS TO THE LOCAL TELCO AND TELL THEM WE

1 HAVE AUTHORIZATION TO CHANGE THEIR PIC CODE --
2 CHOOSE US AS THEIR LONG DISTANCE CARRIER.

3 Q. AND THAT'S AN ACRONYM FOR SOMETHING?

4 A. YES.

5 Q. I'M NOT PARTICULARLY INTERESTED IN WHAT
6 IT'S AN ACRONYM FOR.

7 ANY OTHER FUNCTIONS AS MANAGER OF THE
8 ORDERING PROCESSING CENTER?

9 A. I'M ALSO SITE COORDINATOR FOR THE FLORIDA
10 AND GEORGIA REGION, AND MY RESPONSIBILITIES INCLUDE
11 THE INTERFACE OF THE OPERATIONS DEPARTMENT FOR THE
12 EDZ DEPARTMENT FOR THE ENHANCEMENT OF THE COMPUTER
13 BILLING DEPARTMENT AND CONVERSION.

14 Q. AND WHAT DO YOU DO IN THAT FUNCTION?

15 A. I WORK ON CONVERSION OF SWITCHES. I
16 MAINTAIN THE COMPUTER SIGN-ONS FOR ALL THE PEOPLE
17 THAT NEED TO HAVE COMPUTER ACCESS. I WORK ON A
18 VARIETY OF THE COMMITTEES TO CONSOLIDATE SWITCHES.
19 ANYTHING THAT INTERFACES WITH EDZ SWITCHING COMPANY.

20 Q. WHAT DID EDZ DO? DOES IT DO ALL COMPUTER
21 FUNCTIONS?

22 A. YES, IT DOES.

23 Q. NOW, YOU SAID THAT THE MERGER OCCURRED IN
24 DECEMBER OF 1992?

25 A. THAT'S CORRECT.

1 Q. AND YOUR LAST INVOLVEMENT WITH TSI AS AN
2 ACCOUNT WAS SPRING OF '91?

3 A. THAT'S CORRECT.

4 Q. WHAT DID YOU DO BETWEEN THE SPRING OF '91
5 AND DECEMBER OF '92? AND THAT WOULD BE AT ATC.

6 A. CORRECT. I WAS STILL MANAGER OF ORDER
7 ENTRY FOR A TIME, AND THEN WE CENTRALIZED FUNCTIONS
8 WITH OUR OFFICE IN SAN ANTONIO, TEXAS, SO THE ORDER
9 ENTRY FUNCTION MOVED TO SAN ANTONIO, TEXAS, AND I
10 TOOK OVER THE BACK END RESEARCH DEPARTMENT OF THAT
11 CUSTOMER SERVICE, AND THAT WAS TO RESOLVE CUSTOMERS'
12 WRITTEN COMPLAINTS FOR CREDITS, ADJUSTMENTS,
13 DISPUTES, TO MAINTAIN SUPPORT FOR THE CUSTOMER
14 SERVICE DEPARTMENT THAT WAS ON THE PHONES. ANYTHING
15 THEY COULDN'T HANDLE FOR A CUSTOMER WHILE ON THE
16 PHONE WAS PASSED TO THE RESEARCH GROUP.

17 Q. AND WHEN DID YOU START PERFORMING THAT
18 FUNCTION?

19 A. OCTOBER OF 1991 TO THE BEST OF MY
20 RECOLLECTION.

21 Q. AT THE TIME THAT YOU NO LONGER WERE
22 INVOLVED WITH THE TSI ACCOUNT AT ATC, WHAT WERE YOU
23 DOING AT THAT POINT IN TIME? WHAT WERE YOUR JOB
24 FUNCTIONS?

25 A. ORDER ENTRY MANAGER. VERY SIMILAR

1 FUNCTIONS TO WHAT I'M DOING NOW WITH THE EXCEPTION OF
2 THE EDZ INTERFACE.

3 Q. SO AT THE TIME YOU LEFT YOU WERE THE
4 MANAGER OF ORDER ENTRY AT ATC?

5 A. CORRECT.

6 Q. DID YOU HOLD THAT POSITION THE WHOLE TIME
7 WHEN YOU HAD THE TSI ACCOUNT?

8 A. YES, I DID.

9 Q. SO FROM SHORTLY AFTER THE BEGINNING OF
10 THE RELATIONSHIP BETWEEN TSI AND ATC IN 1989 THROUGH
11 THE SPRING OF 1991, YOU WERE THE ORDER ENTRY MANAGER
12 AT ATC?

13 A. THE JOB TITLE MAY HAVE CHANGED BUT THE
14 FUNCTIONS WERE REALLY THE SAME.

15 Q. IF YOU NEED TO TAKE A BREAK AT ANY TIME,
16 JUST LET US KNOW AND WE'LL DO THAT.

17 A. OKAY.

18 Q. WERE YOU EVER AN EMPLOYEE OF A COMPANY
19 CALLED TRANSCALL AMERICA, INC.?

20 A. I HAVE ALWAYS KNOWN THE COMPANY AS ATC.

21 Q. WERE YOU A COMPANY OF TELUS?

22 A. YES, I WAS.

23 Q. AND THAT WAS A COMPANY THAT WAS ACQUIRED
24 BY ATC?

25 A. YES, IT WAS. THERE ARE AN AWFUL LOT OF

1 NAMES OF COMPANIES IN HERE.

2 Q. RIGHT. DO YOU HAPPEN TO REMEMBER
3 APPROXIMATELY WHEN TELUS WAS ACQUIRED BY ATC?

4 A. NO, I CAN'T.

5 Q. THAT'S FINE. SEE, YOU DID IT. "I DON'T
6 KNOW," THAT'S A GOOD ANSWER. IF THAT'S THE CASE.

7 SO, I TAKE IT THAT YOUR ANSWER TO THE
8 QUESTION OF HAVE YOU EVER BEEN AN EMPLOYEE OF
9 TRANSCALL AMERICA, INC. WOULD BE "NO" TO YOUR
10 KNOWLEDGE, OR "I DON'T KNOW"?

11 A. MY ANSWER IS THAT AFTER THE MERGER WITH
12 TELUS, I KNEW THE COMPANY AS ATC. IF IT HAD ANOTHER
13 CORPORATE NAME, I DON'T KNOW THAT.

14 Q. IS IT OKAY IF WE REFER TO THE PERIOD OF
15 TIME THAT'S BEING COVERED BY THIS DEPOSITION AS --
16 WELL, LET ME ASK YOU: HOW WOULD YOU FEEL COMFORTABLE
17 REFERRING TO THE PERIOD OF TIME WE ARE DISCUSSING?
18 SHORTHAND, SO WE ALL THE KNOW WHAT WE MEAN WHEN WE
19 SAY IT.

20 A. I DON'T UNDERSTAND YOUR QUESTION.

21 Q. FOR EXAMPLE, INSTEAD OF SAYING THE PERIOD
22 SHORTLY AFTER THE BEGINNING OF THE RELATIONSHIP
23 BETWEEN TSI AND TELUS THROUGH THE SPRING OF 1991, CAN
24 WE CALL THAT SOMETHING SHORTHAND?

25 A. THE PERIOD THAT I SERVICED THE ACCOUNT?

1 Q. THE PERIOD THAT YOU SERVICED TSI'S
2 ACCOUNT?

3 A. YES.

4 Q. DURING THE PERIOD OF TIME THAT YOU
5 SERVICED TSI'S ACCOUNT -- SEE, I'M USING IT RIGHT
6 AWAY -- WHAT WAS YOUR KNOWLEDGE AND EXPERIENCE WITH
7 THE RECORD KEEPING SYSTEM AT ATC?

8 A. WHICH RECORD KEEPING SYSTEM?

9 Q. WHICH RECORD KEEPING SYSTEM DID YOU HAVE
10 EXPERIENCE WITH?

11 A. I WAS INVOLVED IN THE PREPARATION OF THE
12 MONTHLY BILLING STATEMENT TO TSI.

13 Q. WHAT WAS YOUR INVOLVEMENT IN THAT
14 PROCESS?

15 A. EACH MONTH I WAS GIVEN A SUMMARY OF THE
16 BILLS THAT TSI RECEIVED FOR THEIR CUSTOMERS AND I
17 WOULD TAKE THE SUMMARY PAGE AND CALCULATE THE MINUTES
18 BY THE RATES I WAS INSTRUCTED TO USE AND TYPE UP A
19 SEPARATE INVOICE TO TSI.

20 Q. YOU WERE DELIVERED SOME RECORD?

21 A. THAT'S CORRECT.

22 Q. AND THEN YOU PERFORMED SOME OPERATION ON
23 THAT RECORD TO CREATE ANOTHER RECORD?

24 A. THAT'S CORRECT.

25 Q. WHAT WOULD YOU CALL THE RECORD THAT WAS

1 DELIVERED TO YOU? DID YOU HAVE A NAME FOR IT?

2 A. IT WAS THE GREEN BAR SUMMARY PAGES.

3 Q. THE GREEN BAR SUMMARY PAGE?

4 A. CORRECT.

5 Q. HOW MANY PAGES WOULD THAT DOCUMENT
6 TYPICALLY BE?

7 A. I RECALL IN SOME INSTANCES I RECEIVED
8 JUST A SUMMARY PAGE. AND I ALSO RECALL THAT I SAW A
9 SUMMARY PER CUSTOMER OF TSI BY WHICH THE TOTALS AT
10 THE END WERE ACCUMULATED.

11 Q. SO IS IT FAIR TO SAY ON SOME OCCASIONS
12 YOU WOULD RECEIVE JUST THE SUMMARY PAGE WHICH WOULD
13 CONTAIN ALL THE TOTALS AND ON SOME OCCASIONS THAT
14 SUMMARY PAGE WOULD BE ATTACHED TO A LONGER DOCUMENT
15 WHICH WOULD HAVE ALL THE ACTIVITY FOR ALL THE TSI
16 CUSTOMERS WHEN ADDED TOGETHER WOULD COME UP TO THE
17 TOTALS ON THE SUMMARY PAGE?

18 A. THAT'S CORRECT.

19 Q. NOW, THE GREEN BAR -- LET'S CALL IT THE
20 GREEN BAR SUMMARY --

21 A. OKAY.

22 Q. -- AND IF I'M GOING TO REFER TO THAT
23 PARTICULAR PAGE, WHICH IS AT THE END OF IT, WHICH IS
24 THE TOTALS, I'LL CALL IT THE GREEN BAR PAGE --

25 A. OKAY.

1 Q. -- WHAT -- WHERE DID THE GREEN BAR
2 SUMMARY COME FROM?

3 A. THE IS DEPARTMENT.

4 Q. IS BEING INFORMATION SERVICES?

5 A. THAT'S CORRECT.

6 Q. AND WHOSE DEPARTMENT WAS THAT? WHO'S IN
7 CHARGE OF THAT DEPARTMENT? IF YOU RECALL.

8 A. THERE WERE MANY PEOPLE IN CHARGE OF THAT
9 DEPARTMENT DURING THE TIME SPAN -- RAY YEAGER WOULD
10 BE THE LAST VICE-PRESIDENT THAT I RECALL AT THAT
11 TIME.

12 Q. AND WHAT WAS HIS TENURE, IF YOU CAN
13 ESTIMATE FOR ME? I WON'T HOLD YOU TO SPECIFIC
14 DATES.

15 A. I DON'T KNOW.

16 Q. THAT'S Y-E-A-G-E-R, LIKE THE FIGHTER
17 PILOT?

18 A. YES.

19 Q. AND HE WOULD BE THE VICE-PRESIDENT AT ATC
20 THAT WOULD BE IN CHARGE, OF WHICH BILLING WAS PART?

21 A. YES, SIR.

22 Q. WITH REGARD TO THE TSI ACCOUNT, WAS THAT
23 GREEN BAR SUMMARY THE ONLY DOCUMENT THAT YOU EVER SAW
24 IN ORDER TO PREPARE THE BILL THAT YOU WERE
25 PREPARING?

1 A. YES, IT WAS.

2 Q. ARE YOU AWARE THAT THE IS DEPARTMENT
3 GENERATED ANY OTHER KINDS OF DOCUMENTATION FOR TSI
4 WITH REGARD TO BILLING FUNCTIONS?

5 A. I KNOW THAT THEY PREPARED 8 AND A HALF BY
6 11 INVOICES FOR EACH INDIVIDUAL CUSTOMER. AND A BIG
7 BOX OF GREEN BAR, WHICH I ASSUME WAS A COPY OF
8 REINVOICES BUT ON GREEN BAR PAPER.

9 Q. LET ME BACK UP A SECOND HERE. SO -- LET
10 ME SEE IF I UNDERSTAND THIS.

11 THERE WAS A SOURCE DOCUMENT THAT YOU
12 RECEIVED WHICH WAS A GREEN BAR SUMMARY --

13 A. YES.

14 Q. -- AND YOU USED THAT TO CREATE THE
15 INVOICE THAT WENT TO TSI?

16 A. CORRECT.

17 Q. AND IN ADDITION TO THAT, THERE WAS ALSO
18 CREATED INDIVIDUAL DETAILED BILLS THAT WERE TO GO TO
19 CUSTOMERS?

20 A. THAT'S CORRECT.

21 Q. AND IN ADDITION TO THAT, THERE WAS ALSO
22 THE SAME INFORMATION THAT WAS CONTAINED ON THE
23 CUSTOMERS' INVOICES TOGETHER IN ONE GREEN BAR
24 SUMMARY?

25 A. THAT'S CORRECT.

1 Q. SO, CAN WE CALL THE CUSTOMER INVOICES
2 CUSTOMER INVOICES AND THAT GREEN BAR THAT CONTAINED
3 ALL THE CUSTOMER INVOICES INFORMATION THE CUSTOMER
4 GREEN BARS --

5 A. OKAY.

6 MR. MESSER: I WOULD SUGGEST YOU CALL
7 THEM TSI CUSTOMER INVOICES.

8 BY MR. NOWAK:

9 Q. OKAY, TSI CUSTOMER INVOICES AND TSI GREEN
10 BARS?

11 A. OKAY.

12 Q. NOW, THOSE TWO DOCUMENTS WHEN TAKEN
13 TOGETHER SHOULD HAVE THE SAME INFORMATION ON THEM?

14 A. YES.

15 Q. SO THE TOTAL OF ALL OF THE USAGE FOR ALL
16 THE TSI CUSTOMERS -- THIS WAS A MONTHLY BASIS,
17 CORRECT?

18 A. YES.

19 Q. -- FOR ANY MONTH, THE SUMMARY OF THE
20 USAGE OF ALL THE TSI CUSTOMERS WOULD BE CONTAINED ON
21 THE TSI CUSTOMER GREEN BAR SUMMARY?

22 A. YES.

23 Q. THAT'S FOUR SEPARATE DOCUMENTS, CORRECT?
24 THE GREEN BAR SUMMARY THAT YOU RECEIVED, THE INVOICE
25 THAT YOU CREATED FROM IT, THE INDIVIDUAL TSI CUSTOMER

1 INVOICES AND THE MONTHLY CUSTOMER GREEN BAR INVOICES?

2 A. THAT'S CORRECT.

3 Q. ARE THERE ANY OTHER DOCUMENTS THAT YOU
4 ARE AWARE OF CREATED BY ATC'S INFORMATION SERVICE
5 DEPARTMENT?

6 A. NONE THAT I'M AWARE OF.

7 Q. DID YOU EVER DO ANYTHING WITH THE TSI
8 CUSTOMER INVOICES OR THE TSI CUSTOMER GREEN BAR
9 SUMMARIES?

10 A. NO, I DID NOT.

11 Q. YOU HAD NO INVOLVEMENT WITH THAT END OF
12 IT AT ALL?

13 A. NOTHING MORE THAN TO OCCASIONALLY MAKE A
14 PHONE CALL TO TSI TO SAY IT WAS READY TO BE PICKED
15 UP.

16 Q. AM I CORRECT IN ASSUMING THAT THE GREEN
17 BAR SUMMARY THAT YOU RECEIVED FROM INFORMATION
18 SERVICES CONTAINED THE RAW INFORMATION WHICH WAS
19 GOING TO BE USED IN COMPILING THE BILL -- THE
20 MONTHLY INVOICE -- TO TSI FOR THE SERVICES THAT IT
21 WAS RESPONSIBLE TO PAY ATC FOR?

22 A. YES.

23 Q. TELL ME EACH MONTH HOW YOU WOULD GO ABOUT
24 THE PROCESS OF CREATING THE INVOICE.

25 A. I WOULD TAKE THE LAST PAGE OF THE SUMMARY

1 DETAIL, WHICH WAS BROKEN OUT BY TYPES OF CALLS AND
2 DAY, EVENING AND NIGHT RATES, AND IT SHOWED THE
3 NUMBER OF CALLS AND THE NUMBER OF MINUTES FOR EACH OF
4 THOSE CATEGORIES. AND I WOULD TAKE THE MINUTES OF
5 USAGE AND MULTIPLY IT BY THE RATE AS I WAS
6 INSTRUCTED.

7 Q. SO YOU TOOK THE TOTAL NUMBER OF MINUTES
8 FOR EACH CATEGORY REFLECTED ON THE GREEN BAR SUMMARY
9 PAGE AND MULTIPLIED IT BY A RATE FOR THAT KIND OF
10 USAGE?

11 A. CORRECT.

12 Q. AND THAT CAME OUT TO A TOTAL DOLLAR
13 NUMBER?

14 A. YES, IT DID.

15 Q. AND THEY WERE ENTERED AS LINE ITEMS ON
16 THE INVOICE?

17 A. YES, SIR.

18 Q. FOR EXAMPLE, AN INVOICE WOULD HAVE A LINE
19 ITEM FOR INTERNATIONAL CALLS?

20 A. YES.

21 Q. AND A TOTAL OF MINUTES?

22 A. YES.

23 Q. AND A RATE?

24 A. INTERNATIONAL WAS DONE DIFFERENTLY.

25 INTERNATIONAL WAS THAT I TOOK THE TOTAL AMOUNT OF

1 MONEY BILLED TO TSI CUSTOMERS AND TOOK OFF 40 PERCENT
2 AND BILLED TSI THE REMAINING 60 PERCENT OF THAT TOTAL
3 MONEY AMOUNT.

4 Q. WHY WAS THAT DONE DIFFERENTLY THAT WAY?

5 A. WHEN I FIRST BEGAN PREPARING THE INVOICE
6 FOR TSI, IT WAS DECIDED THAT I COULD NOT GO THROUGH
7 CALL BY CALL BECAUSE INTERNATIONAL RATES DIFFERED BY
8 COUNTRY -- COUNTRY TO COUNTRY -- AND SO IT WAS
9 DETERMINED THAT THE OVERALL AVERAGE TO BILL TSI WAS
10 TO BILL IT AT 60 PERCENT OF THE CHARGE THEY WERE
11 BILLING THE CUSTOMERS AT.

12 Q. WAS THIS AN AGREEMENT WITH TSI AND ATC OR
13 WAS THIS JUST SOMETHING THAT ATC DECIDED TO DO? IF
14 YOU KNOW.

15 A. I DON'T RECALL.

16 Q. DO YOU KNOW IF THERE WAS AN AGREEMENT
17 BETWEEN TSI AND ATC ON HOW INTERNATIONAL CALLS WERE
18 TO BE BILLED?

19 A. I HAVE SEEN THE ORIGINAL CONTRACT WHICH
20 INCLUDES A SECTION ON INTERNATIONAL CALLS.

21 Q. IS THAT THE DOCUMENT WHICH YOU WERE
22 OPERATING UNDER?

23 A. I HAD -- I HAD IT IN MY POSSESSION,
24 YES. I DO NOT RECALL AT THE TIME IF I -- HOW I WAS
25 INSTRUCTED TO DO THE INVOICES.

1 Q. DID YOU CONSIDER THE ORIGINAL AGREEMENT
2 BETWEEN TSI AND TELUS TO BE THE DOCUMENT WHICH
3 GOVERNED THE BILLING PROCESS?

4 A. YES.

5 Q. AND YOU ACTED ACCORDINGLY?

6 A. I ACTED ACCORDING TO MY SUPERIOR'S
7 INSTRUCTIONS.

8 Q. AND WHO WAS YOUR SUPERIOR?

9 A. DENNIS SICKLE.

10 Q. AND DENNIS SICKLE IS THE ONE WHO WOULD
11 HAVE INSTRUCTED YOU TO BILL THE INTERNATIONAL CALLS
12 IN THIS MANNER?

13 A. TO THE BEST OF MY RECOLLECTION.

14 Q. DO YOU KNOW IF HE'S STILL EMPLOYED BY
15 LDDS COMMUNICATIONS?

16 A. YES, HE IS.

17 Q. SO IF I UNDERSTAND YOU CORRECTLY,
18 REGARDLESS OF WHAT THE ACTUAL RATE WAS TO BE APPLIED
19 TO INTERNATIONAL CALLS FOR THE TIME ELAPSED FOR THE
20 CALL, WHAT YOU WOULD BILL TSI FOR WAS 60 PERCENT OF
21 THE CUSTOMER TOTAL FOR ALL INTERNATIONAL CALLS FOR
22 THAT MONTH?

23 A. THAT'S CORRECT.

24 Q. WHAT ABOUT THE OTHER CATEGORIES OF
25 SERVICE?

1 A. THERE WAS A RATE PER MINUTE THAT I
2 MULTIPLIED THE TOTAL OF MINUTES BY.

3 Q. AND THAT RATE WOULD BE REFLECTED ON THE
4 INVOICE?

5 A. YES, IT DID.

6 Q. SO IF WE WENT TO THE NUMBER OF MINUTES
7 REFLECTED AND MULTIPLIED IT, IT WOULD COME OUT TO THE
8 DOLLAR ON THE COST COLUMN?

9 A. THAT'S CORRECT.

10 Q. AND WHERE DID YOU GET THE RATE TO APPLY
11 TO THE TOTAL NUMBER OF MINUTES?

12 A. FROM MY INSTRUCTIONS.

13 Q. DO YOU KNOW IF THE RATE EVER CHANGES?

14 A. NOT THAT I RECALL.

15 Q. DID YOU EVER COMPARE THE RATE THAT YOU
16 CHARGED TO THE RATE THAT WAS SPECIFIED IN THE
17 CONTRACT FOR THAT CLASS OF SERVICE?

18 A. I DON'T RECALL EVER DOING THAT.

19 Q. DURING THE COURSE OF THE TIME WHEN YOU
20 SERVICED THE TSI ACCOUNT, DO YOU RECALL EVER HAVING
21 OCCASION TO REFER TO THE ORIGINAL CONTRACT BETWEEN
22 TSI AND TELUS?

23 A. YES, I DID.

24 Q. AND DO YOU RECALL THE REASONS WHY YOU
25 MADE THAT REFERENCE?

1 A. TO -- I RECALL ONE INSTANCE WHERE I
2 REFERRED TO IT TO DETERMINE WHEN PAYMENT OF THE BILL
3 WAS TO BE MADE.

4 Q. SO THAT PAYMENT TERMS --

5 A. PAYMENT TERMS.

6 Q. DO YOU RECALL WHAT THE PAYMENT TERMS
7 WERE?

8 A. 50 PERCENT ON THE 15TH OF THE MONTH AND
9 THE BALANCE BY THE END OF THE MONTH.

10 Q. 50 PERCENT OF THE TOTAL INVOICE ON THE
11 15TH DAY OF THE MONTH AND 50 PERCENT AT THE END OF
12 THE MONTH -- THE OTHER 50 PERCENT?

13 A. CORRECT.

14 Q. 15TH DAY OF WHAT MONTH WAS THE 50 PERCENT
15 DUE?

16 MR. MESSER: DO YOU UNDERSTAND THE
17 QUESTION?

18 THE WITNESS: YES, I DO.

19 THE 15TH OF THE MONTH AFTER THE INVOICE
20 WAS GENERATED. AS I RECALL, INVOICES WERE
21 GENERATED AT THE BEGINNING OF THE MONTH, SO IT
22 WOULD BE THE 15TH OF THAT SAME MONTH.

23 BY MR. NOWAK:

24 Q. YOUR RECOLLECTION IS THE INVOICES WERE
25 GENERATED AT THE BEGINNING OF THE MONTH?

1 A. FOR THE PREVIOUS MONTH.

2 Q. SO IF THERE WERE INVOICES FOR JANUARY
3 1991, THE USAGE FOR THAT MONTH WOULD BE REFLECTED ON
4 AN INVOICE THAT WAS GENERATED IN FEBRUARY 1991?

5 A. THAT'S CORRECT.

6 Q. WERE THE INVOICES ALWAYS GENERATED IN THE
7 BEGINNING OF THE MONTH FOLLOWING USAGE? LET ME ASK A
8 BETTER QUESTION. I DON'T WANT TO MAKE MR. MESSER
9 HAVE TO OBJECT.

10 DO YOU RECALL ANY INSTANCES WHERE THE
11 INVOICE WAS GENERATED MORE THAN A MONTH AFTER THE
12 MONTH IN WHICH USAGE WAS CONSUMED?

13 A. I DO NOT REMEMBER ANY INCIDENTS DURING
14 THE TIME I SERVICED THE ACCOUNT.

15 Q. DID YOU EVER WORK IN THE INFORMATION
16 SERVICES DEPARTMENT?

17 A. NO, I DID NOT.

18 Q. OTHER THAN GENERATING THE MONTHLY
19 INVOICES TO BE SENT TO TSI FOR PAYMENT OF -- FOR
20 PAYMENT FOR USAGE, WHAT OTHER FUNCTIONS DID YOU
21 PERFORM IN SERVICING THE TSI ACCOUNT DURING THE
22 PERIOD OF TIME WHEN YOU SERVICED IT?

23 A. I SUPERVISED THE STAFF THAT WOULD
24 ACTUALLY ENTER HIS SALES ORDER INTO THE BILLING
25 SYSTEM AND ALSO THE GROUP THAT PUT THE TELEPHONE

1 NUMBERS, 800 NUMBERS, AUTH CODES INTO THE SWITCH.

2 Q. YOU BLEW BY ME ON THAT ONE, TOO.

3 OKAY. THE FIRST THING YOU SAID WAS YOU
4 SUPERVISED THE PEOPLE WHO DID THE INPUTTING OF NEW
5 ORDERS?

6 A. CORRECT.

7 Q. AND THAT WOULD BE -- IF I UNDERSTAND
8 CORRECTLY, AND STOP ME IF I'M MISSING SOMETHING
9 HERE -- IF TSI SIGNED UP A NEW CUSTOMER, THEY WOULD
10 SUBMIT AN ORDER TO SOMEONE AT ATC AND THAT ORDER
11 WOULD BE PROCESSED?

12 A. CORRECT.

13 Q. AND THAT CUSTOMER WOULD BE HOOKED UP TO
14 THE ATC SYSTEM?

15 A. CORRECT.

16 Q. SO WHAT WOULD YOU DO TO SUPERVISE THAT?

17 A. I WOULD BE THERE TO MAKE SURE THAT THERE
18 WASN'T ANY BACKLOG IN WORK, THAT THERE WAS ALWAYS
19 SOMEBODY CROSS-TRAINED TO HANDLE -- TO DO THE
20 INFORMATION INTO THE COMPUTER.

21 Q. SO ONE OF YOUR FUNCTIONS WAS TO MAKE SURE
22 THIS WAS DONE PROMPTLY?

23 A. CORRECT.

24 Q. NEW ORDERS WERE EXECUTED PROMPTLY?

25 A. YES.

1 Q. AND ANOTHER THING THAT YOU SAID WAS --
2 AND I MISSED SOMETHING ABOUT THE AUTH CODES -- I
3 JUST MISSED IT.

4 A. WE ALSO ENTERED THE AUTH CODES AND THE
5 A&I'S INTO THE SWITCH.

6 Q. WHAT DOES THAT MEAN?

7 A. THAT'S HOW THEY ARE GOING TO BE ABLE TO
8 MAKE LONG DISTANCE CALLS.

9 Q. AND WHAT PROCESS WOULD YOU FOLLOW IN
10 ORDER TO ACCOMPLISH THAT?

11 A. WE WOULD TAKE THE SERVICE ORDER FORM --
12 THE APPLICATION FROM TSI, AND AFTER ENTERING IT INTO
13 THE BILLING SYSTEM, WOULD PASS IT TO WHAT WAS CALLED
14 THE SWITCH GROUP, AND THEY WOULD TAKE THE A&I'S AND
15 THE AUTH CODE ASSIGNED BY THE ORDER ENTRY PERSON AND
16 ACTIVATE THEM INTO OUR SWITCH.

17 Q. AND ONE OF YOUR FUNCTIONS WAS TO MAKE
18 SURE THAT THAT WAS DONE PROMPTLY AS WELL?

19 A. CORRECT.

20 Q. ANY OTHER FUNCTIONS THAT YOU PERFORMED IN
21 SUPERVISING THE TSI ACCOUNT BESIDES SUPERVISING THE
22 MONTHLY ACCOUNTS, SUPERVISING THE AUTH CODES AND
23 A&I'S?

24 A. I WORKED WITH TSI TO ISSUE CREDITS ON THE
25 ACCOUNT AND TO SECURE PAYMENT.

1 Q. AND I ASSUME THAT YOU HAD DIRECT CONTACT
2 WITH TSI EMPLOYEES FOR THAT FUNCTION?

3 A. YES.

4 Q. WHO DID YOU HAVE CONTACT WITH?

5 A. JOEL.

6 Q. JOEL ESQUEHAZI?

7 A. CORRECT.

8 Q. ANYBODY ELSE THAT YOU SPOKE TO ABOUT ANY
9 OF THAT?

10 A. I RECALL SPEAKING TO CARLOS RODRIGUEZ,
11 BUT I DON'T KNOW IF IT WAS FOR THE CREDITS?

12 Q. SO IS IT FAIR TO SAY THAT YOUR
13 RECOLLECTION RIGHT NOW IS IF YOU SPOKE TO ANYBODY AT
14 TSI REGARDING CREDITS, IT WAS JOEL?

15 A. CORRECT.

16 Q. WHO DID YOU SPEAK TO ABOUT PAYMENT?

17 A. JOEL.

18 Q. OTHER THAN TALKING ABOUT, OR
19 COMMUNICATING, I SHOULD SAY, ABOUT NEW ORDERS,
20 CREDITS AND PAYMENT, WAS THERE ANY OTHER
21 COMMUNICATION THAT YOU HAD WITH ANYBODY AT TSI DURING
22 THE PERIOD OF TIME THAT YOU SERVICED THE ACCOUNT?

23 A. NOT THAT I RECALL.

24 Q. DID YOU HAVE ANY OTHER INVOLVEMENT WITH
25 THE BILLING SYSTEM AT ATC OTHER THAN TO RECEIVE GREEN

1 BAR SUMMARIES AND GENERATE INVOICES?

2 A. NO, I DID NOT.

3 Q. DID YOU HAVE OTHER ACCOUNTS THAT YOU
4 SUPERVISED BESIDES TSI?

5 A. YES, I DID.

6 Q. APPROXIMATELY HOW MANY?

7 A. THERE WAS ONE OTHER.

8 Q. SO WAS THIS A SPECIAL EVENT TO SUPERVISE
9 AN ACCOUNT?

10 A. THE TWO -- THE TSI AND THE OTHER
11 CORPORATION WERE UNIQUE AND SEPARATE FROM THE REST OF
12 ATC'S CUSTOMER BASE. I DID THE SAME FUNCTIONS FOR
13 ALL TELUS CUSTOMERS BUT NEVER IN PREPARATION OF BILLS
14 OR ANYTHING ELSE.

15 Q. WHAT WAS UNIQUE ABOUT TSI AND THE OTHER
16 COMPANY?

17 A. THE WAY THEY DID BUSINESS, THE WAY THEY
18 RECEIVED -- WE PREPARED INVOICES FOR THEM TO BILL
19 THEIR CUSTOMERS AND THE WAY I PREPARED A SEPARATE
20 INVOICE TO THE COMPANY.

21 Q. THAT WAS NOT THE NORMAL COURSE FOR OTHER
22 CUSTOMERS?

23 A. NO, IT WAS.

24 Q. WHAT WAS THE NORMAL COURSE FOR ISSUING
25 INVOICES FROM ATC TO OTHER CUSTOMERS?

1 A. ONCE THE ACCOUNT WAS ESTABLISHED IN THE
2 BILLING SYSTEM, WE DID THE SAME FUNCTIONS TO PUT THEM
3 INTO THE SWITCH AND THEN THE BILLING SYSTEM
4 AUTOMATICALLY GENERATED AND MAILED THE BILL OUT TO
5 THE CUSTOMER.

6 Q. SO, IF I UNDERSTAND YOU CORRECTLY, FOR
7 ALL OF THE OTHER CUSTOMERS THAT YOU ARE AWARE OF
8 BESIDES TSI AND THIS OTHER COMPANY THAT YOU
9 SUPERVISED THE ACCOUNT FOR, THE BILLING FROM THE
10 INFORMATION SERVICES DEPARTMENT WAS AUTOMATIC?

11 A. CORRECT.

12 Q. THE COMPUTER DID WHATEVER FUNCTION NEEDED
13 TO BE DONE AT THE END OF THE MONTH AND ISSUED A BILL?

14 A. CORRECT.

15 Q. WHICH WAS THEN SENT TO THE CUSTOMER?

16 A. CORRECT.

17 Q. DO YOU KNOW WHY TSI AND THIS OTHER
18 COMPANY WERE TREATED DIFFERENTLY?

19 A. NO, I DO NOT.

20 Q. DO YOU KNOW IF THERE WERE ANY OTHER
21 COMPANIES BESIDES TSI AND THIS ONE OTHER COMPANY
22 WHOSE BILLS WERE GENERATED OTHER THAN IN THE ORDINARY
23 COURSE?

24 A. THOSE ARE THE ONLY TWO COMPANIES THAT I'M
25 AWARE OF.

1 Q. DID YOU, IN PREPARATION OF THE BILL FOR
2 THE OTHER COMPANY, APPLY THE SAME DISCOUNT FOR A LONG
3 DISTANCE CALL?

4 A. I DO NOT RECALL IF THE OTHER COMPANY HAD
5 THE SAME RATES PER MINUTE. I DON'T RECALL. THE
6 PREPARATION -- THE SAME TYPE OF FUNCTION WAS
7 PERFORMED, TAKING THE SUMMARY SHEETS AND APPLYING A
8 RATE PER MINUTE.

9 Q. DID YOU EVER SEE ANY OTHER DOCUMENT THAT
10 REGULATED THE BUSINESS RELATIONSHIP BETWEEN ATC AND
11 TSI OTHER THAN THE ORIGINAL CONTRACT WITH TELUS?

12 A. NO, I NEVER DID.

13 Q. DO YOU HAVE ANY KNOWLEDGE ABOUT THE --
14 HOW LONG BILLING INFORMATION WAS RETAINED BY ATC IN
15 THE ORDINARY COURSE?

16 A. NO, I DON'T.

17 Q. DO YOU HAVE ANY KNOWLEDGE ABOUT THE
18 LENGTH OF TIME IN WHICH BILLING INFORMATION WAS
19 RETAINED ON THE TSI ACCOUNT BY ATC?

20 A. NO, I DON'T.

21 Q. WHO WOULD HAVE BEEN INVOLVED AT ATC IN
22 THE RETENTION OF THAT INFORMATION, IF YOU KNOW?

23 A. THE IS DEPARTMENT.

24 Q. DO YOU HAPPEN TO KNOW HOW BILLING
25 INFORMATION WAS STORED AT ATC?

1 A. NO, I DON'T.

2 Q. DO YOU KNOW WHAT EQUIPMENT WAS USED TO
3 GENERATE THE INFORMATION THAT WAS USED IN THE BILLING
4 PROCESS AT ATC?

5 A. NO, I DON'T.

6 Q. DO YOU KNOW IF THERE WAS ANY PROGRAM OR
7 PROTOCOL IN PLACE AT ATC TO DETECT ERRORS IN
8 BILLING?

9 A. AT THAT TIME? DURING THAT TIME PERIOD?

10 Q. DURING THE TIME YOU WERE A SUPERVISOR FOR
11 THE TSI ACCOUNT.

12 A. NO, I DON'T.

13 Q. DID YOU EVER BECOME AWARE OF A BILLING
14 ERROR IN THE TSI ACCOUNT?

15 A. THROUGH JOEL. THROUGH CONVERSATIONS WITH
16 JOEL.

17 Q. IS IT FAIR TO SAY THAT IN EVERY INSTANCE
18 WHERE YOU BECAME AWARE OF A BILLING ERROR, THAT
19 BILLING ERROR WAS BROUGHT TO YOUR ATTENTION BY JOEL
20 ESQUENAZI?

21 A. YES.

22 Q. AND WHAT WAS YOUR RESPONSE TO THOSE
23 COMPLAINTS?

24 A. I ISSUED HIM CREDITS FOR THE CALLS IN
25 QUESTION.

1 Q. DID YOU INVESTIGATE THE COMPLAINT?

2 A. I DO NOT RECALL.

3 Q. DO YOU EVER RECALL GETTING A COMPLAINT
4 ABOUT A BILLING ERROR FROM JOEL ESQUENAZI ABOUT THE
5 TSI ACCOUNT IN WHICH YOU DID NOT ISSUE A CREDIT?

6 A. NO. I RECALL GIVING HIM MOST CREDITS
7 THAT HE REQUESTED.

8 Q. I'M NOT BEING -- YOUR ANSWER OF MOST
9 CREDITS BEING ISSUED INDICATES TO ME THAT THERE MAY
10 HAVE BEEN SITUATIONS WHERE THERE WERE NOT. DO YOU
11 RECALL ANY SUCH SITUATIONS?

12 A. WHAT I RECALL IS THAT WE SOMETIMES
13 DISAGREED ON THE AMOUNT OF THE CREDIT. BUT A CREDIT
14 WAS ALWAYS GIVEN.

15 Q. CREDIT WAS ALWAYS GIVEN, BUT SOMETIMES
16 NOT IN THE AMOUNT REQUESTED?

17 A. RIGHT. AND THOSE WERE -- IN MOST
18 INSTANCES IT WAS THE TOTAL AMOUNT REQUESTED.

19 Q. DURING THE TIME THAT YOU WERE SUPERVISING
20 THE TSI ACCOUNT, WAS ANYBODY ELSE INVOLVED IN THE
21 PROCESS OF ISSUING CREDITS BESIDES YOURSELF TO TSI?

22 A. I DID NOT PHYSICALLY DO THE CREDITS --
23 ALL OF THE CREDITS -- BUT I GAVE AUTHORIZATION TO
24 OTHER DEPARTMENTS TO GIVE THE CREDITS.

25 Q. DID YOU, YOURSELF, HAVE TO OBTAIN

1 AUTHORIZATION FROM SOMEBODY ELSE BEFORE THE CREDIT
2 WAS ISSUED?

3 A. OVER A CERTAIN DOLLAR AMOUNT I WOULD HAVE
4 HAD TO.

5 Q. DO YOU RECALL THE DOLLAR AMOUNT?

6 A. NO.

7 Q. WOULD ALL OF THE CREDITS THAT WERE ISSUED
8 HAVE BEEN DOCUMENTED?

9 A. MY DOCUMENTATION WOULD HAVE CONSISTED OF
10 MY BALANCE SHEET THAT SHOWED HOW MUCH WAS BILLED, HOW
11 MUCH PAID AND HOW MUCH I GAVE IN CREDIT AND THE
12 BALANCE DUE.

13 Q. SO THAT WOULD BE AN INTERNAL DOCUMENT
14 THAT YOU KEPT FOR YOUR OWN PURPOSES?

15 A. CORRECT.

16 Q. AND SINCE YOU WERE GENERATING THE
17 INVOICES EVERY MONTH, WOULD YOU REFLECT THE CREDITS
18 ON THE INVOICE?

19 A. I DON'T REMEMBER HOW I DID THAT.

20 Q. WOULD YOU ISSUE A CREDIT MEMO TO TSI TO
21 LET THEM KNOW THAT THE CREDIT HAD BEEN ISSUED?

22 A. NO. MOST OF IT, AS I RECALL, WAS VERBAL.

23 Q. SO YOU WOULD CALL HIM UP AND TELL HIM YOU
24 WERE ISSUING THE CREDIT?

25 A. YES.

1 Q. DO YOU KNOW WHAT INFORMATION THE
2 INFORMATION SERVICES DEPARTMENT USED TO CREATE THE
3 GREEN BAR SUMMARY THAT YOU USED IN PREPARING THE BILL
4 FOR TSI?

5 A. COULD YOU REPEAT THE QUESTION, PLEASE.

6 Q. LET ME TAKE A RUNNING LEAP AT IT.

7 A. OKAY.

8 Q. EVERY MONTH, AS I UNDERSTAND, YOU WERE
9 DELIVERED A GREEN BAR SUMMARY FROM INFORMATION
10 SERVICES WHICH YOU USED TO PREPARE THE BILL TO TSI?

11 A. CORRECT.

12 Q. DO YOU KNOW WHAT INFORMATION INFORMATION
13 SERVICES USED TO CREATE THE GREEN BAR SUMMARY?

14 A. INFORMATION OFF OF OUR SWITCH.

15 Q. DO YOU KNOW HOW THAT WAS DONE?

16 A. NO, I DON'T.

17 Q. DO YOU KNOW WHAT -- THIS IS GOING TO BE
18 AN AWKWARD QUESTION, SO IF YOU DON'T UNDERSTAND IT,
19 PLEASE FEEL FREE TO CLARIFY IT.

20 DO YOU KNOW WHAT STANDARD WAS USED FOR
21 PURPOSES OF RECORDING TIME TO GENERATE A RECORD OF
22 USAGE BY TSI?

23 A. NO, I DO NOT.

24 Q. FOR EXAMPLE, DO YOU KNOW IF IT WAS ON A
25 COMPLETED CALL BASIS OR ON AN ACCESS TIME BASIS?

1 A. I DO NOT KNOW.

2 Q. YOU KNOW WHAT A COMPLETED CALL BASIS IS?

3 A. YES, I DO.

4 Q. DO YOU KNOW IF THE BILL WAS GENERATED
5 BASED UPON CONVERSATION TIME OR ON SOME OTHER BASIS?

6 A. I DO NOT KNOW.

7 Q. DO YOU KNOW IF ANY OF THE RAW CALL DATA
8 WHICH WAS GENERATED BY THE SWITCH HAS BEEN RETAINED
9 BY ATC?

10 A. I DO NOT KNOW.

11 Q. DO YOU RECALL EVER GETTING A COMPLAINT
12 FROM SOMEONE AT TSI ABOUT MISSING CUSTOMER INVOICES?
13 IN OTHER WORDS, THEY WERE DELIVERED A STACK OF
14 INVOICES TO SEND TO THEIR CUSTOMER BUT THEY DIDN'T
15 HAVE ALL OF THEM.

16 A. I DON'T REMEMBER.

17 Q. IF SOMEBODY AT TSI WAS GOING TO LODGE A
18 COMPLAINT ABOUT SOMETHING HAVING TO DO WITH THEIR
19 SERVICE FROM ATC, ARE YOU THE PERSON THEY WOULD CALL
20 DURING THE TIME THAT YOU SUPERVISED THEIR ACCOUNT?

21 A. I COULD HAVE BEEN ONE OF THE PEOPLE THEY
22 CALLED.

23 Q. DO YOU RECALL CONVERSATIONS ALONG THAT
24 LINE DURING THE TIME THAT YOU SERVICED THE ACCOUNT,
25 COMPLAINT CALLS?

1 A. REGARDING CREDITS, YES.

2 Q. ANY OTHER COMPLAINT CALLS? FOR EXAMPLE,
3 SOMETHING WOULDN'T NECESSARILY RESULT IN ISSUING A
4 CREDIT BUT IN SOME OTHER PROCESS BEING DONE?

5 MR. MESSER: NO, I HAVE A REQUEST THAT
6 YOU CLARIFY FROM WHOM THE COMPLAINTS ARE
7 COMING.

8 BY MR. NOWAK:

9 Q. ANYBODY AT TSI?

10 A. I DON'T RECALL ANY.

11 Q. DO THE CREDITS THAT YOU RECALL ISSUING TO
12 TSI DURING THE PERIOD OF TIME THAT YOU SUPERVISED THE
13 ACCOUNT, WERE THEY THE RESULT OF SOME BILLING
14 INACCURACY?

15 A. WHAT COULD BE PERCEIVED AS A BILLING
16 INACCURACY? PROBLEMS THAT COULD BE PERCEIVED AS --

17 Q. LET ME ASK A BETTER QUESTION.

18 A. OKAY.

19 Q. DO YOU RECALL WHAT KINDS OF COMPLAINTS
20 YOU RECEIVED FROM TSI WHICH MIGHT BE PERCEIVED BY
21 THEM AS BEING A BILLING INACCURACY?

22 A. ONE-MINUTE CALLS, INCOMPLETE
23 INTERNATIONAL CALLS, AND DUPLICATE CALLS IN THE SAME
24 TIME PERIOD.

25 Q. WHAT DO YOU MEAN BY ONE-MINUTE CALLS AS A

1 PERCEIVED BILLING INACCURACY.

2 A. THAT A CUSTOMER DOESN'T THINK THAT THEY
3 HAD A CONVERSATION THAT LASTED JUST ONE MINUTE.

4 Q. LET ME SEE IF I UNDERSTAND THIS.
5 CUSTOMERS WOULD COMPLAIN TO TSI AFTER RECEIVING THEIR
6 INVOICE THAT THEY DIDN'T HAVE A TELEPHONE
7 CONVERSATION FOR JUST ONE MINUTE AND THEY WOULD
8 COMPLAIN TO TSI ABOUT THAT?

9 A. I DON'T KNOW HOW THE CUSTOMER COMPLAINED
10 TO TSI ON THIS.

11 Q. LET ME ASK YOU ANOTHER QUESTION. WHY
12 WOULD YOU ISSUE A CREDIT FOR ONE-MINUTE CALLS?

13 A. TO APPEASE CUSTOMERS.

14 Q. DID YOU EVER EXPLAIN TO TSI THAT THIS WAS
15 NOT A BILLING INACCURACY?

16 A. I DON'T RECALL.

17 Q. DID ANYBODY AT TSI EXPRESS TO YOU THEIR
18 REASON FOR BELIEVING IT WAS A BILLING INACCURACY?

19 A. I DON'T RECALL.

20 Q. WHAT ABOUT INCOMPLETE INTERNATIONAL
21 CALLS? WHY WOULD THAT BE A SUBJECT OF DISPUTE?

22 A. AGAIN, IT'S LIKE A ONE-MINUTE CALL BUT
23 IT'S INTERNATIONAL. THAT'S JUST THE PHRASE I'M USED
24 TO USING, IS INCOMPLETE INTERNATIONAL CALLS.

25 Q. SO IT WOULDN'T NECESSARILY BE A CALL THAT

1 WASN'T COMPLETED, IT MIGHT BE A CALL THAT WAS
2 COMPLETED AND LASTED ONLY ONE MINUTE?

3 A. YES.

4 Q. DO YOU KNOW WHY THAT WOULD BE PERCEIVED
5 AS BEING A BILLING INACCURACY?

6 A. I DON'T RECALL -- I DON'T KNOW HOW TO
7 ANSWER THAT QUESTION.

8 Q. THE REASON FOR MY QUESTION IS BECAUSE THE
9 DESCRIPTION OF INCOMPLETE INTERNATIONAL CALLS SOUNDS
10 LIKE ANOTHER KIND OF PROBLEM.

11 A. IT MIGHT HAVE BEEN A POOR CHOICE OF
12 WORDS.

13 Q. FAIR ENOUGH.

14 WHAT ABOUT DUPLICATE CALLS IN THE SAME
15 TIME PERIOD?

16 A. OKAY. THAT IS WHEN -- BECAUSE CUSTOMERS
17 ARE BILLED AT ONE MINUTE INCREMENTS, YOU COULD MAKE A
18 PHONE CALL -- HANG UP THE PHONE, CALL AND DIAL
19 ANOTHER PHONE CALL AND COMPLETE TWO CALLS -- TWO
20 SHORT CALLS IN THE SAME ONE MINUTE TIME FRAME -- THE
21 COMPUTER -- THE BILLING WOULD SHOW THE SAME TIME
22 PERIOD. SO IT WOULD -- IT COULD APPEAR TO BE A
23 DUPLICATE CALL IN THE SAME TIME PERIOD.

24 Q. I SEE.

25 YOU SAID THAT THE CUSTOMERS WERE BILLED

1 IN ONE-MINUTE TIME INCREMENTS. DO YOU MEAN TSI
2 CUSTOMERS?

3 A. YES.

4 Q. DO YOU KNOW WHAT THE BASIS OF BILLING TSI
5 FOR THAT TIME WAS? THE SAME TIME?

6 A. MY RECOLLECTION IS IT WAS IN SIX-SECOND
7 INCREMENTS.

8 Q. AND HOW DO YOU KNOW THAT?

9 A. FROM THE CONTRACT, AND AS I RECALL
10 WORKING FROM THE GREEN BAR, IT ALWAYS HAD TENTHS OF
11 SECONDS ON IT. IT WAS NEVER JUST POINT ZERO FOR THE
12 SUMMARY PAGES.

13 Q. SO YOUR RECOLLECTION IS THAT THAT
14 TSI/TELUS CONTRACT WHICH YOU OPERATED UNDER SPECIFIED
15 THAT TSI WAS TO BE BILLED IN SIX-SECOND INCREMENTS?

16 A. YES.

17 Q. AND YOUR RECOLLECTION IS, ALSO, FROM
18 PREPARING THE BILLS, THAT WHEN YOU LOOKED AT THE
19 GREEN BAR SUMMARY PAGES, THEY ALWAYS CONTAINED
20 FRACTIONAL MINUTES?

21 A. CORRECT.

22 Q. DID YOU EVER HAVE OCCASION TO COMPARE THE
23 TOTAL NUMBER OF MINUTES USED BY TSI CUSTOMERS UNDER
24 ONE-MINUTE BILLING AND THE TOTAL NUMBER OF MINUTES
25 USED BY TSI ON SIX-SECOND INCREMENTAL BILLING?

1 A. NO, I DID NOT.

2 Q. WHICH WOULD YOU EXPECT TO HAVE BEEN THE
3 HIGHER NUMBER IN TERMS OF MINUTES?

4 MR. MESSER: I'M GOING TO OBJECT TO THE
5 QUESTION BECAUSE SHE HASN'T INDICATED THAT
6 SHE'S PERFORMED ANY REASONABLE ANALYSIS OR
7 STUDY OF THE SITUATION. YOU ARE ASKING THE
8 WITNESS FOR A WILD GUESS.

9 MR. NOWAK: OKAY. YOU CAN ANSWER.

10 THE WITNESS: COMMON SENSE LEADS ME TO
11 BELIEVE THAT THE CUSTOMER'S BILLS WOULD BE
12 HIGHER.

13 MR. NOWAK: OKAY. CAN WE TAKE A
14 FIVE-MINUTE BREAK AND THEN I'LL START WITH THE
15 DOCUMENTS, OKAY?

16 (THEREUPON, A SHORT RECESS WAS OBSERVED
17 BY ALL PARTIES PRESENT.)

18 (THEREUPON, A DOCUMENT WAS MARKED AS
19 DEFENDANT'S EXHIBIT 2 FOR
20 IDENTIFICATION.)

21 BY MR. NOWAK:

22 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
23 BEEN MARKED TSI 2 FOR IDENTIFICATION AND TELL ME IF
24 YOU RECOGNIZE THE FORM OF THAT.

25 A. IT'S A COPY OF THE CUSTOMER'S BILL.

1 Q. FROM TELUS COMMUNICATIONS?

2 A. YES.

3 Q. AND YOU WERE AN EMPLOYEE OF TELUS
4 COMMUNICATIONS AT ONE POINT?

5 A. YES.

6 Q. AND THE ADDRESS IS 10230 NORTHWEST 163RD
7 DRIVE, MIAMI?

8 A. YES.

9 Q. IS THAT THE OFFICE THAT YOU WORKED OUT
10 OF?

11 A. YES.

12 Q. AND THE TELEPHONE NUMBER THERE IS (305)
13 624-0164?

14 A. CORRECT.

15 (THEREUPON, A DOCUMENT WAS
16 MARKED AS DEFENDANT'S EXHIBIT 3 FOR
17 IDENTIFICATION.)

18 BY MR. NOWAK:

19 Q. WOULD YOU TAKE A LOOK WHAT'S BEEN MARKED
20 TSI EXHIBIT NO. 3 FOR YOUR DEPOSITION AND TELL ME IF
21 YOU RECOGNIZE THE FORM OF THAT DOCUMENT.

22 A. IT'S A COPY OF A CUSTOMER'S BILL FROM
23 ATC.

24 Q. AND IF YOU WOULD LOOK AT THE LAST
25 PAGE -- THE BOTTOM THIRD OF THE PAGE THERE -- IT

1 SAYS, "ADVANCED TELECOMMUNICATIONS CORPORATION, 1020
2 NORTHWEST 163RD DRIVE, MIAMI," AND THE PHONE NUMBER
3 IS (305) 624-0164, CORRECT?

4 A. THAT'S CORRECT.

5 Q. AND THAT'S THE SAME ADDRESS AND TELEPHONE
6 NUMBER AS THE OLD TELUS OFFICE?

7 A. THAT'S CORRECT.

8 Q. AND YOU CONTINUED TO WORK IN THE SAME
9 OFFICE?

10 A. YES, I DID.

11 Q. IN THE MIDDLE OF THE PAGE THERE'S A
12 BACKGROUND THERE THAT SAYS ATC LONG DISTANCE, DO YOU
13 SEE THAT?

14 A. YES, I DO.

15 Q. DO YOU RECALL WHEN ATC STARTED OPERATING
16 UNDER THE NAME ATC LONG DISTANCE?

17 A. NO, I DON'T RECALL.

18 Q. AT THIS TIME, WHICH IS, AGAIN, THE END OF
19 FEBRUARY 1992, WERE YOU STILL WORKING IN MIAMI?

20 A. BY THAT TIME I WAS WORKING IN BOCA.

21 (THEREUPON, A DOCUMENT WAS
22 MARKED AS DEFENDANT'S EXHIBIT 4 FOR
23 IDENTIFICATION.)

24 BY MR. NOWAK:

25 Q. WOULD YOU PLEASE LOOK AT TSI EXHIBIT NO.

1 4 FOR IDENTIFICATION AND TELL ME IF YOU RECOGNIZE
2 THAT FORM.

3 A. IT'S A CUSTOMER BILL FROM ATC
4 COMMUNICATIONS.

5 Q. AND THIS IS A CUSTOMER BILL TO -- TSI IS
6 THE CUSTOMER?

7 A. YES.

8 Q. SO THIS WOULD HAVE BEEN ONE OF THE STACK
9 OF INDIVIDUAL CUSTOMER'S INVOICES THAT WERE CREATED
10 BY INFORMATION SERVICES?

11 A. COULD YOU REPEAT THE QUESTION?

12 Q. WOULD THIS BE ONE OF THE DOCUMENTS THAT
13 YOU REFERRED TO AS ONE OF THE TSI CUSTOMER INVOICES
14 THAT WERE GENERATED BY INFORMATION SERVICES TO BE
15 SENT TO INDIVIDUAL CUSTOMERS?

16 A. FOR TSI TO SEND TO THEIR CUSTOMERS?

17 Q. YES.

18 A. I DON'T BELIEVE IT LOOKS LIKE THIS.

19 Q. DO YOU RECALL THE FORM OF THIS BILL?

20 A. THIS IS A -- A COPY OF A BILL THAT WE
21 WOULD SEND TO ANY CUSTOMERS BILLED OUT OF THE MIAMI
22 BILLING SYSTEM UNDER EITHER THE NAME TELUS OR ATC.

23 Q. SO DO YOU KNOW WHY TSI WAS BILLED OUT OF
24 ATC'S BILLING SYSTEM?

25 A. I DO NOT KNOW.

1 Q. AND THIS IS A BILL DATED FEBRUARY 27,
2 1991?

3 A. THAT'S CORRECT.

4 Q. AND IT ALSO IS FROM ADVANCED
5 TELECOMMUNICATIONS CORPORATION, 10203 NORTHWEST 163RD
6 DRIVE, MIAMI, AND THE TELEPHONE NUMBER IS 624-0164,
7 CORRECT?

8 A. CORRECT.

9 Q. AND THAT'S THE SAME ADDRESS AND TELEPHONE
10 NUMBER THAT YOU WORKED AT THE WHOLE TIME YOU WORKED
11 IN MIAMI?

12 A. CORRECT.

13 Q. DID YOU HAVE AN UNDERSTANDING AS TO THE
14 PROTOCOL REGARDING THE BILLING OF TSI CUSTOMERS?

15 A. I DON'T UNDERSTAND THE QUESTION.

16 Q. WHO WAS TO SEND THE BILLS TO TSI
17 CUSTOMERS?

18 A. TSI.

19 Q. FROM THAT BILLING INFORMATION THAT WAS
20 PREPARED FROM ATC'S BILLING INFORMATION DEPARTMENT?

21 A. CORRECT.

22 Q. WHO WOULD RECEIVE A BILL DIRECTLY FROM
23 ATC OF THE KIND THAT YOU HAVE JUST LOOKED AT IN TSI
24 EXHIBIT NO. 4?

25 A. ATC CUSTOMERS BILLED ON THE MIAMI

1 PLATFORM -- THE MIAMI TANDEM COMPUTER.

2 Q. WAS THERE ANY CIRCUMSTANCE THAT YOU WERE
3 AWARE OF DURING THE TIME THAT YOU SERVICED THE TSI
4 ACCOUNT WHEN A TSI CUSTOMER WAS TO BE BILLED DIRECTLY
5 BY ATC'S BILLING SYSTEM PLATFORM?

6 A. NO.

7 (THEREUPON, A DOCUMENT WAS
8 MARKED AS DEFENDANT'S EXHIBIT 5 FOR
9 IDENTIFICATION.)

10 BY MR. NOWAK:

11 Q. WOULD YOU PLEASE TAKE --

12 MR. MESSER: BEFORE YOU MOVE TO THE NEXT
13 EXHIBIT, I WOULD LIKE TO HAVE THE PRIVILEGE OF
14 VOIR DIRING THE WITNESS PURELY ON THE
15 DOCUMENTS THAT YOU MARKED FOR IDENTIFICATION.

16 MR. NOWAK: I PASS THE WITNESS.

17 VOIR DIRE EXAMINATION

18 BY MR. MESSER:

19 Q. MAY I ASK YOU IF PLAINTIFF'S EXHIBITS FOR
20 IDENTIFICATION 2, 3, AND 4 WERE PREPARED BY YOU OR
21 PREPARED UNDER YOUR SUPERVISION OR CONTROL?

22 A. NO, SIR.

23 Q. ARE THOSE DOCUMENTS MAINTAINED IN YOUR
24 CUSTODY OR IN YOUR -- OR UNDER YOUR POSSESSION AND
25 CONTROL AS AN EMPLOYEE OF THE COMPANY?

1 A. NO, SIR.

2 MR. MESSER: NOTHING FURTHER.

3 CONTINUED DIRECT EXAMINATION

4 BY MR. NOWAK:

5 Q. PLEASE TAKE A LOOK AT WHAT'S BEEN MARKED
6 TSI EXHIBIT NO. 5 FOR YOUR DEPOSITION AND TELL ME IF
7 YOU RECOGNIZE THE FORM OF THAT LETTER.

8 A. YES, I DO.

9 Q. WHAT IS IT?

10 A. IT'S A COLLECTION LETTER SENT FROM ATC'S
11 COLLECTION DEPARTMENT TO THE DELINQUENT CUSTOMER.

12 Q. THAT WOULD HAVE BEEN AN ATC CUSTOMER?

13 A. CORRECT.

14 Q. AND IT WOULD HAVE BEEN SENT BY THE
15 ADVANCED TELECOMMUNICATIONS CORP. COLLECTION
16 DEPARTMENT?

17 A. CORRECT.

18 Q. WHICH IS LOCATED AT THE SAME PLACE AT THE
19 OFFICE AT 10203 NORTHWEST 163RD DRIVE IN MIAMI?

20 A. CORRECT.

21 Q. WHEN WOULD SUCH A COLLECTION NOTICE BE
22 SENT?

23 A. WHEN AN ACCOUNT WAS DELINQUENT.

24 Q. WOULD A -- I THINK OF THIS AS A DUNNING
25 LETTER --

1 A. OKAY.

2 Q. -- WOULD IT EVER BEEN SENT TO A TSI
3 CUSTOMER?

4 A. NO.

5 (THEREUPON, A DOCUMENT WAS
6 MARKED AS DEFENDANT'S EXHIBIT 6 FOR
7 IDENTIFICATION.)

8 BY MR. NOWAK:

9 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
10 BEEN MARKED TSI EXHIBIT NO. 6 FOR YOUR DEPOSITION AND
11 TELL ME IF YOU RECOGNIZE THAT FORM.

12 A. YES, I DO.

13 Q. THIS IS ANOTHER ATC DUNNING LETTER?

14 A. CORRECT.

15 Q. AND THIS WOULD HAVE BEEN SENT TO AN ATC
16 CUSTOMER?

17 A. YES.

18 Q. IN THIS TIME PERIOD THAT'S REFLECTED ON
19 THE LAST TWO EXHIBITS, NUMBER 5 AND NUMBER 6, ARE
20 PERIODS OF TIME WHEN YOU WOULD HAVE BEEN SUPERVISING
21 THE TSI ACCOUNT AT ATC?

22 A. YES, SIR.

23 (THEREUPON, A DOCUMENT WAS
24 MARKED AS DEFENDANT'S COMPOSITE EXHIBIT 7
25 FOR IDENTIFICATION.)

1 BY MR. NOWAK:

2 Q. LET ME ASK YOU TO TAKE A LOOK AT A
3 FIVE-PAGE EXHIBIT WHICH HAS BEEN MARKED AS TSI
4 COMPOSITE EXHIBIT NUMBER 7 TO YOUR DEPOSITION AND ASK
5 YOU IF YOU RECOGNIZE THE FORM OF THOSE FIVE LETTERS.

6 A. YES, I RECOGNIZE THEM.

7 Q. AND THESE ARE DUNNING LETTERS SIMILAR TO
8 THE ONES THAT WE HAVE IDENTIFIED AS TSI EXHIBIT NO. 5
9 AND NO. 6, CORRECT?

10 A. CORRECT.

11 Q. AND THESE WOULD HAVE BEEN ISSUED AT THE
12 TIME THAT YOU WERE EMPLOYED AT THE MIAMI OFFICE OF
13 ATC?

14 A. I BELIEVE BY THIS TIME IN 1991 I WAS
15 WORKING IN BOCA.

16 Q. SO THIS WOULD HAVE BEEN FROM FEBRUARY --
17 THE END OF FEBRUARY 1991 THROUGH APRIL OF 1991?

18 A. THAT'S CORRECT.

19 Q. DO YOU HAPPEN TO KNOW IF ANY OF THE
20 CUSTOMERS THAT ARE REFLECTED ON TSI EXHIBIT NO. 5, 6
21 AND COMPOSITE NO. 7 WERE ATC CUSTOMERS OR TSI
22 CUSTOMERS?

23 A. I DON'T RECOGNIZE ANY CUSTOMER NAMES.

24 MR. NESSER: FOR THE CLARIFICATION OF THE
25 RECORD, I WOULD LIKE TO ASK THE SAME QUESTION

1 OF THE WITNESS AS TO THE DEFENDANT'S EXHIBITS
2 5, 6 AND COMPOSITE 7 FOR IDENTIFICATION: WERE
3 THESE DOCUMENTS PREPARED BY YOU OR PREPARED
4 UNDER YOUR SUPERVISION AND CONTROL?

5 THE WITNESS: NO, THEY WERE NOT.

6 MR. MESSER: ARE THESE DOCUMENTS
7 MAINTAINED BY YOU IN YOUR PHYSICAL CUSTODY OR
8 CONTROL?

9 THE WITNESS: NO, THEY WERE NOT.

10 MR. MESSER: AND ONE FURTHER QUESTION:
11 CAN YOU, AS A MATTER OF FACT, RECOGNIZE
12 WHETHER ANY OF THESE STATEMENTS AND/OR DUNNING
13 LETTERS WERE ADDRESSED TO AN ATC OR TELUS
14 CUSTOMER OR TSI CUSTOMER?

15 THE WITNESS: NO, I CANNOT.

16 MR. MESSER: SO YOUR ANSWER WOULD BE YOU
17 DO NOT KNOW?

18 THE WITNESS: I DO NOT KNOW.

19 (THEREUPON, A DOCUMENT WAS
20 MARKED AS DEFENDANT'S EXHIBIT 8 FOR
21 IDENTIFICATION.)

22 MR. NOWAK: FOR YOUR INFORMATION, FLOYD,
23 THAT WAS THE DOCUMENT THAT YOU MARKED AS
24 PLAINTIFF'S EXHIBIT NO. 2 IN JOEL'S
25 DEPOSITION.

1 MR. SELF: THAT'S RIGHT.

2 BY MR. NOWAK:

3 Q. LET ME ASK YOU TO LOOK AT TSI EXHIBIT
4 NUMBER 8 FOR YOUR DEPOSITION AND ASK YOU IF YOU
5 RECOGNIZE THAT DOCUMENT.

6 A. YES, I DO.

7 Q. WHAT DO YOU RECOGNIZE IT TO BE?

8 A. CONTRACT BETWEEN TELUS AND TSI.

9 Q. AND THIS IS THE CONTRACT THAT YOU
10 REFERRED TO FROM TIME TO TIME?

11 A. YES, IT IS.

12 (THEREUPON, A DOCUMENT WAS
13 MARKED AS DEFENDANT'S EXHIBIT 9 FOR
14 IDENTIFICATION.)

15 MR. MESSER: GIVE HER A CHANCE TO LOOK AT
16 ALL THE PAGES OF THE DOCUMENT.

17 MR. SELF: LOOK AND SEE IF THEY ARE ALL
18 THE PAGES OF THE CONTRACT.

19 (PAUSE.)

20 THE WITNESS: I DON'T RECALL EVER SEEING
21 THE BACK HALF OF THESE PAGES.

22 BY MR. NOWAK:

23 Q. BACK HALF OF THE PAGES --

24 A. FROM PAGE 12 ON THROUGH 21.

25 Q. SO, YOU RECOGNIZE PAGES 1 THROUGH 12 AS

1 BEING -- WHAT WE HAVE BEEN REFERRING TO AS THE TELUS
2 CONTRACT?

3 A. CORRECT.

4 MR. SELF: 1 THROUGH 11.

5 THE WITNESS: 1 THROUGH 11.

6 BY MR. NOWAK:

7 Q. OKAY, 1 THROUGH 11 BUT NOT PAGES 12
8 ONWARD?

9 A. I DON'T RECALL SEEING THESE PAGES EVER
10 BEFORE.

11 Q. FAIR ENOUGH.

12 SO, IF WE REFER TO TSI EXHIBIT NUMBER 8
13 AS THE TELUS CONTRACT, WE'LL KNOW WHAT WE ARE TALKING
14 ABOUT.

15 A. ALL RIGHT.

16 Q. THAT'S WHAT YOU RECOGNIZE AS BEING PAGES
17 1 THROUGH 11 OF EXHIBIT NUMBER EIGHT.

18 A. YES.

19 Q. WOULD YOU TAKE A LOOK -- I'M SORRY, I
20 HAVEN'T SHOWED THIS TO YOU.

21 MR. SELF: OKAY.

22 BY MR. NOWAK:

23 Q. PLEASE TAKE A LOOK AT WHAT'S BEEN MARKED
24 AS TSI EXHIBIT NO. 9 FOR IDENTIFICATION AND TELL ME
25 IF YOU RECOGNIZE THAT FORM.

1 A. YES, I RECOGNIZE IT.

2 Q. WHAT DO YOU RECOGNIZE IT TO BE?

3 A. THE VEHICLE BY WHICH TSI NOTIFIED US OF
4 THEIR NEW CUSTOMERS AND WHAT SERVICES TO ENTER IN.
5 THIS WAS A SERVICE ORDER AS FAR AS I WAS CONCERNED.

6 Q. SO THIS WOULD HAVE BEEN SOMETHING THAT
7 WOULD HAVE BEEN SENT TO YOUR NEW ORDER DEPARTMENT?

8 A. CORRECT.

9 Q. WHICH YOU WERE A SUPERVISOR?

10 A. CORRECT.

11 Q. WHAT ABOUT THE SECOND PAGE?

12 A. SECOND PAGE IS AN AUTHORIZATION TO THE
13 TELCO -- IT'S AN AUTHORIZATION SIGNED BY THE
14 CUSTOMER THAT GAVE US AUTHORIZATION TO CHANGE HIS PIC
15 TO TELUS.

16 Q. DID ANYTHING THAT WAS DONE BY THE
17 CUSTOMER ON EITHER THE FIRST OR SECOND PAGE OF TSI
18 EXHIBIT NO. 9 TRANSFORM THEM FROM A TSI CUSTOMER TO
19 AN ATC CUSTOMER?

20 MR. SELF: EXCUSE ME. ARE YOU USING ATC
21 AND TELUS SYNONYMOUSLY?

22 MR. NOWAK: WE HAVE BEEN.

23 MR. SELF: YES, OKAY.

24 THE WITNESS: CAN YOU REPEAT THE
25 QUESTION.

1 BY MR. NOWAK:

2 Q. IS THERE ANYTHING THAT WAS DONE ON EITHER
3 THE FIRST OR SECOND PAGE OF WHAT'S BEEN MARKED AS TSI
4 EXHIBIT NO. 9 WHICH TRANSFORMED A TSI CUSTOMER INTO A
5 TELUS OR ATC CUSTOMER?

6 A. TECHNICALLY, YES.

7 Q. WHO WOULD -- OKAY --

8 A. BECAUSE TSI USED THE SAME PIC CODE THAT
9 TELUS DID TO THE TELCOS, THE SOUTHERN BELLS -- THEY
10 DIDN'T KNOW TSI, THEY ONLY KNOW PIC 031 WAS TELUS.
11 SO AS FAR AS THE TELEPHONE COMPANIES WAS CONCERNED,
12 IT WAS A TELUS CUSTOMER.

13 Q. AS FAR AS BETWEEN TELUS OR ATC AND TSI
14 WAS CONCERNED, WHOSE CUSTOMER WAS THIS?

15 A. TSI.

16 Q. AND TSI WOULD BE THE ONE THAT WOULD BILL
17 THIS CUSTOMER?

18 A. CORRECT.

19 Q. AND TSI WOULD BE THE ONE THAT WOULD
20 COLLECT PAYMENTS FROM THE CUSTOMER?

21 A. CORRECT.

22 Q. DURING THE ENTIRE TIME AT WHICH YOU
23 SERVICED THE TSI ACCOUNT, WERE YOU EVER AWARE THAT
24 SERVICE TO TSI WAS INTERRUPTED BY ATC OR TELUS AS A
25 RESULT OF NONPAYMENT BY TSI OF A TELUS OR ATC BILL?

1 A. NOT THAT I RECALL.

2 Q. IS THAT SOMETHING THAT YOU WOULD HAVE
3 BEEN AWARE OF IF IT HAD BEEN DONE?

4 MR. MESSER: DURING WHAT PERIOD OF TIME,
5 COUNSEL?

6 MR. NOWAK: DURING THE PERIOD OF TIME
7 THAT YOU SERVICED THE TSI ACCOUNT.

8 THE WITNESS: AND THE QUESTION IS: DID I
9 KNOW IF ANY OF THESE CUSTOMERS WERE TURNED OFF
10 FOR NONPAYMENT?

11 BY MR. NOWAK:

12 Q. NO, WHETHER TSI SERVICE WAS DISCONTINUED
13 DURING ANY PERIOD OF TIME BY ATC OR TELUS DURING THE
14 PERIOD OF TIME THAT YOU SERVICED THE TSI ACCOUNT.

15 A. YOU WILL HAVE TO REPEAT IT AGAIN. I'M
16 GETTING CONFUSED.

17 Q. IT'S MY UNDERSTANDING -- LET ME TAKE
18 ANOTHER RUNNING LEAP AT THIS ONE -- IT'S MY
19 UNDERSTANDING THAT AS A RESULT OF USAGE BY TSI
20 CUSTOMERS EVERY MONTH TSI BECAME OBLIGATED TO PAY
21 CERTAIN AMOUNTS TO TELUS AND THEN ATC. IS THAT
22 CORRECT?

23 A. YES.

24 Q. WAS THERE EVER AN OCCASION THAT SERVICE
25 WAS DISCONTINUED AS A RESULT OF TSI FAILING TO PAY A

1 BILL TO ATC OR TELUS DURING THE PERIOD OF TIME THAT
2 YOU SUPERVISED THE ACCOUNT?

3 A. NO.

4 Q. AND IF I UNDERSTOOD YOUR PRIOR TESTIMONY
5 CORRECTLY, YOU WERE THE ONE THAT WAS THE CONTACT
6 BETWEEN ATC AND TSI FOR PURPOSES OF TSI'S PAYMENT OF
7 ATC'S BILLS?

8 A. FOR A GOOD PORTION OF THE TIME I WAS.
9 (THEREUPON, A DOCUMENT WAS
10 MARKED AS DEFENDANT'S EXHIBIT 10 FOR
11 IDENTIFICATION.)

12 THE WITNESS: OKAY.

13 BY MR. NOWAK:

14 Q. WOULD YOU TELL ME IF YOU RECOGNIZE THE
15 DOCUMENT THAT'S BEEN MARKED AS TSI EXHIBIT NUMBER 10
16 TO YOUR DEPOSITION?

17 A. YES, I DO.

18 Q. WHAT DO YOU RECOGNIZE IT TO BE?

19 A. A LETTER FROM MYSELF TO TSI THAT WAS
20 FAXED TO HIM.

21 Q. AND THE DATE ON THE FAX COVER PAGE IS
22 JANUARY 12TH, 1990, CORRECT?

23 A. YES.

24 Q. WOULD THAT HAVE BEEN THE TIME WHEN THIS
25 WAS FAXED?

1 A. YES.

2 Q. AND WHAT WAS THE PURPOSE OF YOUR SENDING
3 THIS LETTER TO TSI?

4 A. TO CONFIRM A CONVERSATION FROM THE
5 PREVIOUS DAY.

6 Q. WITH --

7 A. JOEL.

8 Q. ESQUENAZI?

9 A. YES.

10 Q. AND THAT CONVERSATION WAS WHAT?

11 A. THAT TSI WOULD MAIL \$11,017.98 ON JANUARY
12 11TH TO PAY IN FULL THE FIRST INVOICE COVERING THE
13 PERIOD OF JULY TO OCTOBER.

14 "THIS PAYMENT IS DUE IN FULL ON JANUARY
15 12TH, 1990, ACCORDING TO TERMS AND AGREEMENTS IN THE
16 CONTRACT."

17 Q. WHAT CONTRACT IS THAT?

18 A. CONTRACT BETWEEN TELUS AND TSI.

19 Q. THE TELUS CONTRACT?

20 A. YES.

21 Q. WHICH IS PAGE 1 THROUGH 11 OF TSI EXHIBIT
22 NUMBER 8?

23 A. CORRECT.

24 Q. IN THE SECOND PARAGRAPH IT SAYS, "FAILURE
25 TO MEET THESE ARRANGEMENTS WILL RESULT IN SUSPENSION

1 OF SERVICES DESCRIBED IN THE CONTRACT."

2 AND AGAIN YOU ARE REFERRING TO THE TELUS
3 CONTRACT THERE?

4 A. CORRECT.

5 Q. WHAT WAS YOUR UNDERSTANDING AS TO THE
6 DESCRIPTION IN THE CONTRACT ON SUSPENSION OF
7 SERVICE?

8 A. IF THE TERMS OF PAYMENT WERE NOT MADE,
9 THAT EITHER SEVEN OR TEN DAYS AFTER FINAL WRITTEN
10 NOTICE, SERVICE COULD BE TERMINATED.

11 Q. DO YOU KNOW IF SERVICE TERMINATED ON THIS
12 OCCASION?

13 A. I NEVER TERMINATED THE SERVICE.

14 Q. DO YOU KNOW IF THE PAYMENT WAS MADE?

15 A. I DON'T RECALL.

16 Q. WOULD THERE BE SOME RECORD OF WHETHER THE
17 PAYMENT WAS MADE OR NOT?

18 A. IN THE COPIES OF THE DOCUMENTS WE GAVE
19 YOU I HAVE MY SPREADSHEET.

20 Q. THEY ARE BEING COPIED, SO -- THAT'S
21 NUMBER 10, RIGHT?

22 A. YES.

23 MR. NOWAK: WHAT DO YOU WANT TO DO ABOUT
24 LUNCH -- OFF THE RECORD.

25 (INFORMAL DISCUSSION OFF THE RECORD.)

1 ((THEREUPON, A LUNCH RECESS WAS OBSERVED
2 FROM 11:56 A.M. TO 12:53 P.M. BY ALL
3 PARTIES PRESENT.)

4 (INFORMAL DISCUSSION OFF THE RECORD.)

5 BY MR. NOWAK:

6 Q. CAN YOU TELL FROM LOOKING AT YOUR FILE
7 WHETHER THE AMOUNTS THAT ARE SPECIFIED IN YOUR LETTER
8 DATED JANUARY 12TH, 1990, WHICH HAS BEEN MARKED FOR
9 IDENTIFICATION TO YOUR DEPOSITION AS TSI EXHIBIT
10 NUMBER 10, WERE PAID?

11 A. YES, I SHOW IT WAS PAID WITH CHECK NUMBER
12 10080, 1-11 OF 1990.

13 Q. IT WASN'T TIMELY PAID, BUT IT WAS PAID?

14 A. CORRECT. IT WAS PAID ON THE DAY THIS
15 LETTER SAYS TO BE PAID BY JANUARY 11TH.

16 Q. GREAT. SO IT WAS TIMELY PAID?

17 A. YES.

18 (THEREUPON, A DOCUMENT WAS
19 MARKED AS DEFENDANT'S EXHIBIT 11 FOR
20 IDENTIFICATION.)

21 BY MR. NOWAK:

22 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
23 BEEN MARKED TSI EXHIBIT NUMBER 11 AND TELL ME IF YOU
24 RECOGNIZE THAT LETTER.

25 A. YES, I DO.

1 Q. IS THAT YOUR SIGNATURE AT THE BOTTOM?

2 A. YES, IT IS.

3 Q. AND WHAT WAS THE PURPOSE OF SENDING THIS
4 LETTER?

5 A. TO SEEK PAYMENT FOR INVOICES. FEBRUARY
6 INVOICE IN THE AMOUNT OF \$24,559.38 IS DUE TODAY, AND
7 THE DATE AT THE TOP OF THE LETTER IS MAY 2ND, 1990.
8 AND IT CONTINUES TO SAY THAT 50 PERCENT OF THE MARCH
9 INVOICE IN THE AMOUNT OF \$15,350.37 WAS DUE ON APRIL
10 27TH, 1990.

11 Q. AND THE FIRST SENTENCE OF THE LETTER
12 SAYS, "PER THE CONTRACT SIGNED BETWEEN OUR COMPANIES,
13 PAYMENT FOR THE BILL IS DUE AT 50 PERCENT WITHIN 15
14 DAYS AND THE BALANCE IN 30 DAYS," AND THE CONTRACT
15 THAT YOU ARE REFERRING TO IS THE TELUS CONTRACT?

16 A. THAT'S CORRECT.

17 Q. DO YOU KNOW IF THIS PAYMENT WAS TIMELY
18 MADE?

19 A. ACCORDING TO MY RECORDS, WE RECEIVED
20 CHECK NUMBER 1056 IN THE AMOUNT OF \$20,875.47 ON MAY
21 3RD, 1990.

22 Q. AND THAT WAS LESS THAN THE AMOUNT OF
23 \$39,990.75 THAT YOU INDICATED WAS DUE?

24 A. 24,559.38, YES.

25 Q. WAS SERVICE DISCONTINUED AS A RESULT OF

1 THAT?

2 A. NO, IT WAS NOT.

3 Q. DO YOU KNOW WHEN THE BALANCE WAS PAID?

4 A. THE BALANCE, ACCORDING TO MY LEDGER HERE,
5 SHOWS THAT A CREDIT WAS ISSUED IN THE AMOUNT OF
6 \$3,683.91 TO BRING THE BALANCE TO ZERO.

7 Q. AND WHY WAS THAT CREDIT ISSUED?

8 A. I DON'T HAVE ANY NOTES -- JUST THE
9 CREDIT AMOUNT.

10 Q. WAS THAT CREDIT NOTED ON A BILL, A
11 SUBSEQUENT INVOICE?

12 A. I DON'T RECALL HOW I POSTED THE CREDITS
13 DURING THE TIME I WAS DOING THE INVOICES.

14 Q. ON TSI EXHIBIT NUMBER 10 AND NUMBER 11 IT
15 INDICATES THAT THE PLACE OF ORIGIN IS 1550 SOUTH
16 FEDERAL HIGHWAY, BOCA RATON.

17 DOES THAT MEAN THESE LETTERS WERE WRITTEN
18 BY YOU FROM THE BOCA OFFICE?

19 A. YES, IT DOES.

20 Q. WHY WOULD YOU HAVE WRITTEN THESE LETTERS
21 AND SENT THEM FROM THE BOCA OFFICE?

22 A. BECAUSE THAT'S WHERE I WAS WORKING AT THE
23 TIME.

24 Q. AS EARLY AS JANUARY 12TH, 1990?

25 A. I DIDN'T RECALL THE YEAR OR WHEN I MOVED,

1 BUT EVIDENTLY THIS IS WHEN I WAS THERE.

2 Q. AND DO YOU RECALL WHEN THE RELATIONSHIP
3 BETWEEN TSI AND ATC BEGAN?

4 A. FROM REVIEWING THE CONTRACT THIS MORNING,
5 IT WAS IN THE SUMMER OF '89.

6 Q. SO YOU WOULD HAVE BEEN IN THE BOCA OFFICE
7 MONTHS AFTER THAT?

8 A. YES.

9 Q. SO WHEN WE PREVIOUSLY DISCUSSED THIS
10 PERIOD OF TIME WHEN YOU SERVICED THE TSI ACCOUNT AS
11 BEING SHORTLY AFTER THE BEGINNING OF THE RELATIONSHIP
12 BETWEEN ATC -- OR ACTUALLY TELUS -- AND TSI THROUGH
13 THE SPRING OF 1991, THAT IS NOT CORRECT?

14 A. WHEN I FIRST BEGAN SERVICING THE ACCOUNT
15 I WAS WORKING IN MIAMI. AND IT WAS IN -- SHORTLY
16 AFTER THE START-UP OF IT, AND I WORKED WITH THE
17 ACCOUNT UNTIL SPRING OF 1991.

18 Q. PHYSICALLY YOU WERE LOCATED IN THE BOCA
19 OFFICE?

20 A. RIGHT.

21 Q. AT LEAST AS EARLY AS JANUARY 12TH, 1990?

22 A. YES.

23 Q. PHYSICALLY WHERE WAS THE INFORMATION
24 SERVICE DEPARTMENT LOCATED?

25 A. IN THE MIAMI OFFICE.

1 Q. SO THESE GREEN BAR SUMMARIES THAT WERE
2 DELIVERED TO YOU FOR PURPOSES OF GENERATING THE
3 MONTHLY INVOICES TO TSI WOULD HAVE BEEN DELIVERED TO
4 YOU FROM THE MIAMI OFFICE TO THE BOCA OFFICE?

5 A. CORRECT.

6 Q. DO YOU RECALL WHO IT WAS THAT HAD TO
7 AUTHORIZE CREDITS ABOVE A CERTAIN AMOUNT?

8 A. DENNIS SICKLE.

9 Q. YOUR SUPERVISOR?

10 A. MY VICE-PRESIDENT, YES, SIR.

11 (THEREUPON, A DOCUMENT WAS
12 MARKED AS DEFENDANT'S EXHIBIT 12 FOR
13 IDENTIFICATION.)

14 BY MR. NOWAK:

15 Q. PLEASE TAKE A LOOK AT WHAT'S BEEN MARKED
16 TSI NUMBER 12 FOR PURPOSES OF YOUR DEPOSITION AND
17 TELL ME IF YOU RECOGNIZE THAT DOCUMENT.

18 (PAUSE.)

19 A. YES, I RECOGNIZE IT.

20 Q. IS THAT YOUR SIGNATURE AT THE BOTTOM?

21 A. YES, IT IS.

22 Q. WHAT WAS THE PURPOSE OF SENDING THIS
23 LETTER?

24 A. TO RECEIVE PAYMENT ON THE APRIL INVOICE
25 IN THE AMOUNT OF \$31,055.60 WHICH WAS DUE ON JULY

1 6TH. THE LETTER IS DATED JULY 12TH.

2 Q. SO THIS IS ASKING FOR AN OVERDUE
3 PAYMENT?

4 A. CORRECT.

5 Q. DO YOU KNOW IF THE PAYMENT WAS MADE?

6 A. ACCORDING TO MY RECORDS, THE PAYMENT OF
7 THIS INVOICE WAS INCLUDED WITH ANOTHER INVOICE,
8 BECAUSE I SHOW NO DIRECT PAYMENT FOR THE \$31,055.60.
9 AND AFTER THAT, A MAY INVOICE WAS
10 GENERATED IN THE AMOUNT OF \$33,228.03 AND WE RECEIVED
11 A PAYMENT, CHECK NUMBER 1106, FOR 48,805.37.

12 Q. SO YOUR RECORDS DON'T REFLECT A SPECIFIC
13 CHECK BEING RECEIVED FOR THAT AMOUNT, BUT THE --
14 YOUR RECORDS INDICATE THAT THAT INVOICE WAS PAID?

15 A. YES.

16 Q. WHEN WAS IT PAID?

17 A. JULY 16TH.

18 Q. DID THE LATE PAYMENT RESULT IN AN
19 INTERRUPTION OF SERVICE TO TSI?

20 A. NO, SIR.

21 Q. IS THIS A COPY OF THE RECORD THAT YOU ARE
22 REFERRING TO IN ORDER TO CHECK AS TO WHETHER OR NOT
23 PAYMENTS WERE BEING MADE?

24 A. YES, IT IS.

25 MR. NOWAK: CAN WE HAVE THIS MARKED AS

1 TSI EXHIBIT NUMBER 13.

2 (THEREUPON, A DOCUMENT WAS
3 MARKED AS DEFENDANT'S EXHIBIT 13 FOR
4 IDENTIFICATION.)

5 BY MR. NOWAK:

6 Q. AND, AGAIN, FOR PURPOSES OF
7 CLARIFICATION, YOU HAVE BEEN REFERRING TO WHAT HAS
8 BEEN MARKED AS TSI EXHIBIT NUMBER 13 FOR PURPOSES OF
9 DETERMINING WHETHER OR NOT THESE PAYMENTS WE HAVE
10 BEEN DISCUSSING WERE MADE?

11 A. CORRECT.

12 Q. ON TSI EXHIBIT NUMBER 12, THE SECOND
13 PARAGRAPH, THERE IS A REFERENCE TO "IT'S NECESSARY
14 FOR YOU TO ABIDE BY THE TERMS OF THE CONTRACT."

15 IS THAT THE TELUS CONTRACT?

16 A. YES, IT IS.

17 (THEREUPON, A DOCUMENT WAS
18 MARKED AS DEFENDANT'S EXHIBIT 14 FOR
19 IDENTIFICATION.)

20 BY MR. NOWAK:

21 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
22 BEEN MARKED TSI EXHIBIT NUMBER 14 AND TELL ME IF YOU
23 RECOGNIZE THAT DOCUMENT.

24 A. YES, I DO.

25 Q. IS THAT YOUR SIGNATURE AT THE BOTTOM?

1 A. YES, IT IS.

2 Q. WHAT WAS THE PURPOSE OF WRITING THIS
3 LETTER WHICH IS DATED JUNE 17TH, 1991?

4 A. TO ADVISE TSI THAT THE ACCOUNT IS PAST
5 DUE. THE PREVIOUS PAYMENT SCHEDULE AGREED UPON BY US
6 HAS NOT BEEN COMPLETED. AS OF TODAY, THE BACK
7 BALANCE IS \$20,166.36, WHICH WAS DUE ON MAY 20TH,
8 1991. WITH THE APRIL INVOICE OF \$62,157.08, THE
9 TOTAL NOW DUE IS \$82,323.44, AND THIS AMOUNT MUST BE
10 RECEIVED BY JUNE 21 TO AVOID INTERRUPTION OF THE
11 SERVICE.

12 Q. NOW, BY "THIS AMOUNT WHICH MUST BE
13 RECEIVED IN ORDER TO AVOID INTERRUPTION OF SERVICE,"
14 THE AMOUNT IS \$82,323.44?

15 A. THAT'S CORRECT.

16 Q. WAS THAT AMOUNT RECEIVED BY JUNE 21ST?

17 A. MY RECORDS DO NOT GO UP TO JUNE OF 1991.

18 Q. SO YOUR ANSWER WOULD BE --

19 A. I DO NOT KNOW.

20 Q. WHY WERE YOU WRITING THIS LETTER ON JUNE
21 17TH, 1991, AND MORE SPECIFICALLY, DOES THIS INDICATE
22 TO YOU THAT YOU WERE STILL SUPERVISING THE TSI
23 ACCOUNT AT THAT TIME?

24 A. IT INDICATES THAT TO ME, YES.

25 Q. DO YOU KNOW WHY YOUR RECORDS DON'T GO UP

1 THAT FAR?

2 A. THIS IS, AS I RECALL, THE TIME PERIOD
3 THAT I PASSED THE ACCOUNT OVER.

4 Q. DO YOU KNOW IF INTERRUPTION OF SERVICE
5 OCCURRED TO TSI AS A RESULT OF NONPAYMENT OF THIS
6 AMOUNT?

7 A. NO, I DO NOT KNOW.

8 (THEREUPON, A DOCUMENT WAS
9 MARKED AS DEFENDANT'S EXHIBIT 15 FOR
10 IDENTIFICATION.)

11 BY MR. NOWAK:

12 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
13 BEEN MARKED TSI EXHIBIT NUMBER 15 TO YOUR DEPOSITION
14 AND TELL ME IF YOU RECOGNIZE THAT DOCUMENT.

15 A. YES, I DO.

16 Q. IS THAT YOUR SIGNATURE AT THE BOTTOM?

17 A. YES, IT IS.

18 Q. THIS DOCUMENT IS DATED JULY 29TH, 1991,
19 CORRECT?

20 A. CORRECT.

21 Q. DOES THIS INDICATE TO YOU THAT YOU WERE
22 STILL SUPERVISING THE TSI ACCOUNT UP TO THAT DATE?

23 A. I MUST HAVE HAD SOME INVOLVEMENT IF I
24 SENT THIS LETTER.

25 Q. WHAT WAS THE PURPOSE OF SENDING THIS

1 LETTER?

2 A. THE FIRST PARAGRAPH STATES, "THANK YOU
3 FOR YOUR PAYMENT OF \$32,593.66 WHICH REPRESENTS 50
4 PERCENT OF MAY'S USAGE. ACCORDING TO THE TERMS OF
5 THE CONTRACT, \$32,264.45, THE BALANCE OF THE MAY
6 INVOICE, IS DUE ON AUGUST 1ST".

7 Q. AND, AGAIN, THE CONTRACT IS THE TELUS
8 CONTRACT?

9 A. THAT'S CORRECT. IT GOES ON TO SAY, "ON
10 AUGUST 2ND, \$32,933.66, 50 PERCENT OF JUNE'S INVOICE,
11 IS DUE AND THE BALANCE ON AUGUST 17TH. AND PLEASE
12 HAVE THESE PAYMENTS MAILED TO ME AT BOCA OR DROP THEM
13 OFF AT THE MIAMI LOCATION. PAYMENTS ON THE DUE DATE
14 WILL AVOID ANY INTERRUPTION OF SERVICE."

15 Q. DO YOU HAPPEN TO KNOW WHETHER THESE
16 PAYMENTS WERE MADE ON THE DATES SPECIFIED?

17 A. MY RECORDS DON'T GO UP THAT HIGH.

18 Q. SO YOUR ANSWER WOULD BE, NO --

19 A. NO, I DON'T KNOW.

20 Q. DO YOU KNOW IF ANY INTERRUPTION OF
21 SERVICE TO TSI RESULTED AS A RESULT OF NONPAYMENT OF
22 ANY OF THESE AMOUNTS?

23 A. NO, I DO NOT.

24 Q. FAIR ENOUGH.

25 MR. NOWAK: I'M GOING TO MARK THESE AS A

1 COMPOSITE, NUMBER 16.

2 (THEREUPON, A DOCUMENT WAS
3 MARKED AS DEFENDANT'S COMPOSITE EXHIBIT
4 16 FOR IDENTIFICATION.)

5 BY MR. NOWAK:

6 Q. LET ME ASK YOU TO TAKE A LOOK AT WHAT'S
7 BEEN MARKED TSI COMPOSITE EXHIBIT NUMBER 16 TO YOUR
8 DEPOSITION AND TELL ME IF YOU RECOGNIZE THOSE
9 DOCUMENTS. ACTUALLY -- LET ME ASK YOU A DIFFERENT
10 QUESTION.

11 WHY DON'T YOU TAKE A LOOK, GENERALLY,
12 WHAT'S IN THE PACKET, AND I'LL ASK YOU GENERAL
13 QUESTIONS AND THEN WE CAN GET MORE SPECIFIC.

14 (INFORMAL DISCUSSION OFF THE RECORD.)

15 BY MR. NOWAK:

16 Q. ARE YOU GENERALLY FAMILIAR WITH THE
17 CONTENTS OF TSI COMPOSITE EXHIBIT NUMBER 16?

18 A. YES, I AM.

19 Q. DO YOU KNOW WHICH OF THESE INVOICES WAS
20 THE LAST INVOICE IN WHICH YOU WERE INVOLVED IN TERMS
21 OF PREPARING IT FROM THE GREEN BAR SUMMARIES TO SEND
22 TO TSI?

23 A. THE BILL COVERING THE PERIOD OF AUGUST
24 1ST, 1990 TO AUGUST 31, 1990 WOULD BE THE LAST
25 INVOICE I PREPARED FROM THE GREEN BAR.

1 Q. AND THIS IS THE LAST INVOICE WHICH HAS A
2 COVER LETTER WITH YOUR SIGNATURE AT THE BOTTOM?

3 A. THAT'S CORRECT.

4 Q. SO, AM I CORRECT IN ASSUMING THAT ALL OF
5 THE INVOICES DATED OCTOBER 7, 1990 AND AFTERWARDS ARE
6 NOT INVOICES THAT YOU HAD ANY INVOLVEMENT WITH?

7 A. THAT'S CORRECT.

8 Q. DO YOU KNOW HOW ANY OF THE INVOICES DATED
9 OCTOBER 7, 1990 AND AFTERWARDS WERE PREPARED?

10 A. THEY WERE PREPARED BY SOMEBODY IN THE
11 FINANCE DEPARTMENT OF ATC.

12 Q. HOW DO YOU KNOW THAT?

13 A. BECAUSE I PASSED THIS DUTY ON TO THE
14 FINANCE BILLING DEPARTMENT.

15 Q. AND IS THIS SOMETHING THAT WOULD NORMALLY
16 BE DONE IN THE FINANCE DEPARTMENT? MEANING
17 PREPARATION OF BILLS TO CUSTOMERS.

18 A. I WOULD SAY IT WASN'T THE ONLY ONE THEY
19 DID, YES.

20 Q. SO CORRECT ME IF I'M WRONG, BUT ANY OF
21 THE INVOICES DATED OCTOBER 7, 1990 AND AFTERWARDS,
22 YOU WOULD HAVE NO KNOWLEDGE ABOUT WHATSOEVER?

23 A. I DID NOT PREPARE THEM. I DON'T RECALL
24 IF I EVER SAW THEM BEFORE, BUT I HAD NO INVOLVEMENT
25 IN THE PREPARATION OF THEM.

1 Q. DO YOU RECALL HAVING ANY AFTER-THE-FACT
2 INVOLVEMENT WITH ANY OF THESE INVOICES THAT ARE
3 FORMATTED IN THIS WAY?

4 A. IT APPEARS FROM MY BALANCE SHEET THAT I
5 WAS STILL INVOLVED IN THE COLLECTION OF THE ACCOUNT,
6 BUT NOT IN THE PREPARATION OF THE BILL.

7 Q. DO YOU KNOW WHY YOU PASSED THE
8 RESPONSIBILITY FROM YOURSELF TO THE FINANCE
9 DEPARTMENT AFTER AUGUST OF 1990 FOR THE PREPARATION
10 OF THE TSI BILLS?

11 A. IT WAS A DIRECTION FROM MY
12 VICE-PRESIDENT, DENNIS SICKLE.

13 Q. DO YOU HAVE ANY KNOWLEDGE ABOUT THE
14 PROCESS WHICH WAS UTILIZED IN ORDER TO GENERATE THE
15 BILLS AFTER OCTOBER 7, 1990?

16 A. I KNOW THAT I GAVE THE PERSON IN THE
17 FINANCE DEPARTMENT INSTRUCTIONS ON HOW I HAD BEEN
18 PREVIOUSLY DOING IT AND --

19 Q. DO YOU KNOW IF THAT PERSON FOLLOWED THE
20 SAME INSTRUCTIONS IN THE SAME WAY?

21 A. I CANNOT BE SURE OF THAT.

22 Q. SO, YOU DON'T REALLY KNOW HOW THE BILLS
23 DATED OCTOBER 7, 1990 AND AFTERWARDS WERE PREPARED?

24 A. I DON'T KNOW HOW, CORRECT.

25 Q. THE FIRST BILL IN THIS PACKAGE, TSI

1 COMPOSITE NUMBER 16, IS DATED DECEMBER 12TH, 1989,
2 CORRECT?

3 A. CORRECT.

4 Q. AT LEAST THE COVER PAGE IS DATED THAT?

5 A. CORRECT.

6 Q. AND IS THAT YOUR SIGNATURE AT THE
7 BOTTOM?

8 A. YES, IT IS.

9 Q. AS A MATTER OF FACT, IS THAT YOUR
10 SIGNATURE AT THE BOTTOM OF EACH OF THE COVER PAGES
11 FOR ALL THE BILLS THAT YOU WERE INVOLVED IN
12 PREPARING?

13 A. YES, IT IS.

14 Q. DOES THE DATE OF THIS COVER LETTER
15 REFRESH YOUR RECOLLECTION AS TO THE DATE WHICH YOU
16 BEGAN WORKING AT THE BOCA OFFICE OF ATC?

17 A. NOT REALLY.

18 Q. IS IT FAIR TO SAY IT WAS AT LEAST AS
19 EARLY AS DECEMBER 12TH, 1989?

20 A. YES, IT IS.

21 Q. I NOTICE IN THE COVER LETTER IT STATES
22 THAT THE BILL IS FOR THE PERIOD DATED JULY 12TH --
23 JULY 10TH, 1989 THROUGH OCTOBER 31ST, 1989. DO YOU
24 SEE THAT?

25 A. THAT'S CORRECT.

1 Q. WHY WAS THE BILL FOR THAT PERIOD OF TIME
2 GENERATED IN MID-DECEMBER 1989?

3 A. I HAVE NO RECOLLECTION OF THAT.

4 Q. DOES THE DATE, DECEMBER 12TH, 1989,
5 INDICATE TO YOU ON WHAT DAY THIS BILL WAS TRANSMITTED
6 TO TSI?

7 A. THE DATE WOULD LEAD ME TO BELIEVE THAT IT
8 LEFT MY OFFICE ON OR ABOUT THAT SAME DAY.

9 Q. DECEMBER 12TH, 1989?

10 A. THAT'S CORRECT.

11 Q. SO IF MY MATH IS NOT INCORRECT, THE BILL
12 FOR THE PERIOD JULY 10TH, 1989 THROUGH OCTOBER 31ST,
13 1989 WASN'T GENERATED UNTIL APPROXIMATELY A MONTH AND
14 A HALF AFTER THE END OF THAT PERIOD?

15 A. THAT'S CORRECT.

16 Q. THE NEXT BILL, THE COVER PAGE APPEARS TO
17 BE DATED DECEMBER 27TH, 1989, CORRECT?

18 A. THAT'S CORRECT.

19 Q. AND THAT'S FOR THE PERIOD OF NOVEMBER,
20 1989?

21 A. CORRECT.

22 Q. DO YOU KNOW WHY THE NOVEMBER BILL WASN'T
23 PREPARED UNTIL THE END OF DECEMBER?

24 A. I HAVE NO RECOLLECTION OF THAT.

25 Q. WAS THAT TYPICAL IN YOUR EXPERIENCE THAT

1 THE BILLS WERE APPROXIMATELY A MONTH AFTER THE END OF
2 THE SERVICE?

3 A. I REMEMBER IT BEING CLOSER TO THE END OF
4 THE MONTH. THIS MAY HAVE BEEN START-UP TIME.

5 Q. LET ME ASK YOU TO TAKE A LOOK AT THE
6 BILL, AND I'M SORRY THESE PAGES ARE NOT NUMBERED --
7 BUT IT'S THE -- THE COVER LETTER IS DATED JUNE 6TH,
8 1990, AND IT'S THE BILL FOR THE PERIOD OF APRIL,
9 1990.

10 A. OKAY.

11 Q. AND BY THE WAY, ALL OF THESE COVER
12 LETTERS REFER TO THE AGREEMENT WITH TELUS. IS THAT
13 THE TELUS AGREEMENT THAT WE HAVE BEEN REFERRING TO?

14 A. THAT'S CORRECT.

15 Q. PAGES 1 THROUGH 11 OF TSI EXHIBIT NUMBER
16 8?

17 A. CORRECT.

18 Q. THE AMOUNT OF THIS BILL IS \$31,055.60,
19 CORRECT?

20 A. YES, SIR.

21 Q. AND THIS BILL WAS PREPARED BY YOU FROM
22 THE SUMMARY PAGE OF THE GREEN BAR SUMMARY THAT WAS
23 SENT TO YOU?

24 A. CORRECT.

25 Q. AND THE NEXT BILL, THE NEXT MONTH, THE

1 AMOUNT OF THE BILL -- I DON'T UNDERSTAND, BECAUSE IT
2 LOOKS LIKE ON THE BILL FOR APRIL -- MAY, IT SAYS
3 AMOUNT DUE, \$31,055.60.

4 A. ALL RIGHT. YES.

5 Q. IS THAT THE AMOUNT DUE?

6 A. FROM APRIL 1ST THROUGH THE 30TH, YES.

7 Q. MAY 1ST?

8 A. FOR THE CALLS FROM MAY 1ST TO MAY 31ST,
9 THE AMOUNT DUE IS \$33,228.03.

10 Q. AND SO THIS \$31,055.60 IS -- WHAT?

11 A. LOOKS LIKE A TYPO.

12 Q. WHAT ABOUT THE FOLLOWING MONTH, WHICH IS
13 THE JUNE BILL?

14 (PAUSE.)

15 Q. THE OVERALL QUESTION IS: THE AMOUNT DUE
16 ON THE APRIL, MAY AND JUNE BILL, ALL APPEARS TO BE
17 \$31,055.60.

18 AND MY QUESTION TO YOU IS: HOW IS THAT
19 POSSIBLE.

20 A. OKAY. IT APPEARS THAT IT'S A TYPO ERROR
21 ON MY PART WHERE THE COVER SHEET HAS THE CORRECT
22 AMOUNT DUE ACCORDING TO MY WORKSHEET WHERE I HAVE
23 TOTALS, BUT THEN I NEVER CAME DOWN TO THE BOTTOM, THE
24 LINE UNDERNEATH AND RETYPED THE AMOUNT DUE FROM THE
25 PREVIOUS INVOICES.

1 (INFORMAL DISCUSSION OFF THE RECORD.)

2 BY MR. NOWAK:

3 Q. JUST TO CLARIFY SOMETHING -- AND YOU CAN
4 GET OFF THAT -- JUST TO CLARIFY SOMETHING ABOUT YOUR
5 PRIOR TESTIMONY WHICH MR. MESSER BROUGHT TO MY
6 ATTENTION WAS THAT IN TERMS OF THE LENGTH OF TIME IN
7 WHICH YOU SERVICED THE TSI ACCOUNT --

8 A. OKAY.

9 Q. -- THAT WAS NOT A CONTINUOUS PERIOD OF
10 TIME, CORRECT?

11 A. IN SOME ASPECTS IT WAS CONTINUOUS. I WAS
12 ALWAYS MANAGER OF THE DEPARTMENT THAT ACTUALLY ORDER
13 ENTERED HIS ACCOUNTS AND HAD TO INTERFACE WITH THE
14 SWITCH. THE PIECE OF THE PUZZLE THAT I WAS NOT
15 ALWAYS INVOLVED WITH WAS THE COLLECTION OF THE BILL.
16 THAT FUNCTION WENT AWAY AND CAME BACK TO ME AGAIN.

17 Q. AND, APPARENTLY, ALSO PREPARATION OF THE
18 BILL AFTER OCTOBER 7, 1990?

19 A. CORRECT.

20 (THEREUPON, A DOCUMENT WAS
21 MARKED AS DEFENDANT'S EXHIBIT 17 FOR
22 IDENTIFICATION.)

23 BY MR. NOWAK:

24 Q. PLEASE TAKE A LOOK AT WHAT'S BEEN MARKED
25 TSI EXHIBIT 17 TO YOUR DEPO. AND TELL ME IF YOU

1 RECOGNIZE THAT DOCUMENT OR ITS CONTENTS.

2 A. THE DOCUMENT APPEARS TO BE A LETTER FROM
3 JOEL ESQUENAZI TO ME, AND I HAVE NO RECOLLECTION OF
4 THE LETTER.

5 Q. IN THE THIRD FULL PARAGRAPH DOWN FROM THE
6 TOP ON THE LETTER WHICH IS DATED FEBRUARY 13TH, 1990,
7 IT SAYS, "AS WE DISCUSSED, I'M CURRENTLY BEING BILLED
8 MINUTES ON THE TRAVEL SERVICE USAGE AS WELL AS 1-800
9 SERVICE. PLEASE CORRECT THIS MISTAKE TO FUTURE
10 BILLS."

11 DO YOU RECALL DISCUSSING THAT WITH JOEL
12 ESQUENAZI?

13 A. I DO NOT REMEMBER THIS.

14 Q. "ON ALL DOMESTIC ONE-PLUS CALLS I'M
15 BILLED FOR TIME AS THE CUSTOMER; THEREFORE NOT
16 PROFITING FOR THE 30-SECOND MINIMUM."

17 DO YOU RECALL THAT DISCUSSION WITH JOEL
18 ESQUENAZI?

19 A. I DON'T RECALL THE DISCUSSION.

20 Q. THE NEXT PARAGRAPH ON TRAVEL SERVICE, "MY
21 RATES FOR EVENING -- NIGHT AND WEEKEND -- WERE
22 REDUCED TO 16 CENTS A MINUTE. SEE ATTACHED
23 DOCUMENT. PLEASE CORRECT THIS INCORRECT RATE."

24 DO YOU RECALL TAKING ANY ACTION ALONG
25 THOSE LINES?

1 A. I DO NOT REMEMBER.

2 MR. SELF: EXCUSE ME. SHE DOESN'T
3 REMEMBER THE PROBLEM OR TAKING ANY ACTION?

4 BY MR. NOWAK:

5 Q. DO YOU REMEMBER THE TOPIC AT ALL?

6 A. NO, I DO NOT.

7 Q. IN THE LAST PARAGRAPH ON THAT
8 PAGE, "PLEASE NOTE THERE HAS BEEN A NUMBER OF
9 DEDUCTIONS DUE TO THE INCORRECT BILLING AS WELL AS
10 INCOMPLETED CALLS BILLED. THESE CALLS WERE ALL MADE
11 BY FAX MACHINE LINES."

12 DO YOU RECALL ANYTHING ABOUT THAT?

13 A. I REMEMBER THAT I GAVE CREDITS FOR
14 INCOMPLETE CALLS TO THE TSI ACCOUNT.

15 Q. BUT NOT NECESSARILY AS A RESULT OF THIS
16 LETTER?

17 A. CORRECT.

18 MR. MESSER: FOR THE RECORD, WE WANT TO
19 OBJECT TO THE USE OF THIS EXHIBIT WITHOUT THE
20 WITNESS' ACKNOWLEDGMENT OF HAVING RECEIVED IT
21 OR RECALLING ANY PORTION OF IT.

22 SO TO THE EXTENT IT'S READ INTO THE
23 RECORD BY YOU, WE WOULD HAVE THE SAME
24 OBJECTION TO IT AND WE ALSO NOTE THAT THE
25 EXHIBIT FOR IDENTIFICATION NUMBER 17 DOES NOT

1 BEAR THE SIGNATURE OF MR. ESQUENAZI OR ANY
2 OTHER PERSON.

3 (THEREUPON, A DOCUMENT WAS
4 MARKED AS DEFENDANT'S EXHIBIT 18 FOR
5 IDENTIFICATION.)

6 MR. NESSER: WE WOULD ALSO POINT OUT THAT
7 LETTER CARRIES NO ATTACHMENTS TO SUPPORT ANY
8 OF THE STATEMENTS MAINTAINED IN IT.

9 BY MR. NOWAK:

10 Q. DO YOU RECOGNIZE TSI EXHIBIT NUMBER 18?

11 A. I HAVE NO MEMORY OF EVER SEEING THIS
12 BEFORE. IT'S A -- ADDRESSED TO ME, BUT I DON'T
13 RECALL IT.

14 Q. IT'S DATED APRIL 20TH, 1990?

15 A. THAT'S CORRECT.

16 Q. AND THE FIRST SENTENCE SAYS, "WE HAVE
17 DISCUSSED A NUMBER OF TIMES" --

18 MR. NESSER: SAME OBJECTION.

19 MR. NOWAK: GREAT.

20 MR. NESSER: -- AS TO ADMISSIBILITY.
21 INCLUDING YOUR COMMENTS; READING FROM A
22 DOCUMENT THAT THE WITNESS CANNOT IDENTIFY OR
23 AUTHENTICATE.

24 MR. NOWAK: OKAY.

25 BY MR. NOWAK:

1 Q. "WE HAVE DISCUSSED A NUMBER OF TIMES THE
2 INACCURATE BILLING."

3 DO YOU RECALL HAVING SUCH A DISCUSSION
4 WITH JOEL ESQUENAZI?

5 A. I RECALL DISCUSSIONS CONCERNING THE
6 CREDITS THAT I WAS GIVING TO HIM FOR HIS CUSTOMERS.

7 Q. AND THE CREDITS WERE BEING GIVEN TO YOU
8 FOR HIS COMPLAINTS OF INACCURATE BILLING?

9 A. CORRECT.

10 Q. AND THE SECOND SENTENCE SAYS, "I HAVE
11 NOTICED ACCOUNTS UTILIZING MY SERVICES AT ONE MINUTE
12 BILLING, YOU ARE ALSO BILLING ME AT ONE FULL
13 MINUTE."

14 DO YOU RECALL DISCUSSING THAT TOPIC WITH
15 JOEL?

16 A. I DO NOT REMEMBER.

17 Q. AND, AGAIN, THE NEXT SENTENCE DOWN
18 SAYS, "ALSO TRAVEL SERVICES AND 1-800 SERVICES ARE
19 STILL BEING BILLED AT ONE FULL MINUTE. ALL OF THESE
20 SERVICES SHOULD BE BILLED AT SIX-SECOND INCREMENTS;
21 THEREFORE, I'M LOSING MONEY DUE TO THIS ERROR."

22 DO YOU RECALL DISCUSSING THIS TOPIC WITH
23 JOEL ESQUENAZI?

24 A. I DO NOT REMEMBER.

25 Q. THE NEXT PARAGRAPH SAYS, "I HAVE DEDUCTED

1 THE DIFFERENCE OF WHAT I ESTIMATE WHAT THE
2 OVERCHARGES ARE DUE TO THE INCORRECT BILLING."

3 DO YOU RECALL HIM EVER DOING THAT,
4 DEDUCTING AMOUNTS FROM THE BILL AND SENDING YOU THE
5 DIFFERENCE?

6 A. YES, I DO.

7 Q. HOW WOULD YOU RESPOND TO THAT PRACTICE?

8 A. IN MOST SITUATIONS I WOULD CREDIT THE
9 DIFFERENCE OF WHAT HE HAD DEDUCTED AND GIVE HIM THE
10 CREDIT FOR THE AMOUNT HE DEDUCTED.

11 Q. WHY WOULD YOU DO THAT?

12 A. TO KEEP THE CUSTOMER -- TO KEEP TSI
13 SATISFIED.

14 Q. DID ANYBODY HAVE TO APPROVE THAT BESIDES
15 YOU?

16 A. DEPENDING ON THE AMOUNT OF THE CREDIT, IT
17 WOULD HAVE TO BE APPROVED.

18 (THEREUPON, A DOCUMENT WAS
19 MARKED AS DEFENDANT'S EXHIBIT 19 FOR
20 IDENTIFICATION.)

21 BY MR. NOWAK:

22 Q. WOULD YOU TAKE A LOOK AT TSI EXHIBIT
23 NUMBER 19 AND TELL ME IF YOU RECOGNIZE THIS
24 DOCUMENT.

25 A. ARE YOU ASKING ME IF I REMEMBER RECEIVING

1 IT OR -- CAN I IDENTIFY IT?

2 Q. SURE. IDENTIFY IT.

3 A. IT APPEARS TO BE A MEMO OR A LETTER FROM
4 JOEL TO MYSELF --

5 Q. DO YOU REMEMBER --

6 A. -- DATED JUNE 17TH.

7 Q. -- RECEIVING IT?

8 A. NO, I DO NOT REMEMBER RECEIVING IT.

9 Q. CAN I TAKE A LOOK AT YOUR FILE? I
10 THOUGHT I SAW IT IN THERE. I DON'T THINK I MARKED IT
11 BECAUSE I HAVE A COPY.

12 MR. SELF: THERE'S THE ORIGINAL
13 (INDICATING).

14 THE WITNESS: OKAY. I MUST HAVE GOTTEN
15 IT.

16 BY MR. NOWAK:

17 Q. NOW THAT YOU HAVE HAD AN OPPORTUNITY TO
18 REVIEW YOUR FILE, CAN YOU TELL ME IF YOU RECEIVED TSI
19 EXHIBIT NUMBER 19?

20 A. YES, I HAVE THE ORIGINAL IN MY FILE.

21 Q. IN THE SECOND PARAGRAPH IT SAYS, "AS I --
22 AS PREVIOUSLY I HAVE DEDUCTED THE INCORRECT BILLING
23 ON THE AMOUNT OF \$4,912.12."

24 DO YOU KNOW WHAT THAT WAS A REFERENCE TO?

25 A. NO, I DO NOT RECALL.

1 Q. DO YOU KNOW IF YOU ISSUED A CREDIT IN
2 THAT AMOUNT?

3 A. I DO NOT HAVE ANY SINGLE CREDIT ISSUED IN
4 THAT AMOUNT FOR \$4,912.12.

5 Q. THE NEXT SENTENCE SAYS, "I HAVE ALSO
6 DEDUCTED AN ADDITIONAL \$1,454.35 FOR CALLS THAT, AS
7 YOU CAN SEE, ARE DOUBLE BILLED OR INCORRECTLY
8 BILLED."

9 DO YOU RECALL ISSUING A CREDIT FOR THAT
10 AMOUNT?

11 A. I DON'T HAVE A CREDIT LISTED IN THAT
12 AMOUNT ON MY WORKSHEET.

13 Q. DO YOU KNOW WHAT JOEL WAS REFERRING TO
14 ABOUT DOUBLE BILLING AND INCORRECTLY BILLED?

15 A. THE SUBJECT HAD COME UP BEFORE ON
16 PREVIOUS CREDITS.

17 Q. AND IN THE INSTANCES WHERE IT CAME UP
18 BEFORE, WHAT WAS IT REFERRING TO?

19 A. CALLS WERE -- IT WOULD APPEAR THAT TWO
20 CALLS WERE MADE DURING THE SAME TIME PERIOD.

21 Q. I'LL ASK THE QUESTION: DOES THERE APPEAR
22 TO BE A CORRESPONDING CREDIT THAT WAS ISSUED WHICH IS
23 A COMBINATION OF THESE TWO AMOUNTS?

24 A. WELL, LET'S SEE -- YES, THERE IS.

25 Q. SON-OF-A-GUN.

1 WHEN WAS THAT CREDIT ISSUED?

2 A. I DON'T HAVE ANY DATES NEXT TO MY CREDITS
3 BUT I HAVE A TOTAL AMOUNT OF \$6,366.47 POSTED TO --
4 I HAVE IT POSTED TO THE MARCH 1990 INVOICE. ZEROING
5 OUT THE BALANCE AFTER HIS PAYMENT.

6 Q. IN THE NEXT PARAGRAPH IT SAYS, "AS YOU
7 KNOW, I DON'T HAVE ANY CREDIT TO MY CUSTOMERS FOR
8 WRONG NUMBERS, UNANSWERED CALLS, BUT AS YOU CAN SEE,
9 ALL THESE CALLS ARE JUSTIFIED AND INCORRECTLY
10 BILLED. THIS IS A PROBLEM IN WHICH I HAVE BROUGHT IT
11 TO THE ATTENTION OF YVETTE CASTRO, BUT IT SEEMS TO BE
12 AN UNCONTROLLABLE SITUATION."

13 DO YOU KNOW WHAT HE'S TALKING ABOUT
14 THERE?

15 A. IT APPEARS HE'S REFERRING TO HIS
16 REASONINGS FOR HAVING TO GIVE -- FOR REQUESTING
17 CREDITS ON HIS INVOICES.

18 Q. DID YOU TAKE ANY ACTION TO ALLEVIATE THIS
19 PROBLEM SO IT WOULDN'T REOCCUR?

20 A. I DO NOT RECALL TAKING ANY ACTION MYSELF
21 TO ALLEVIATE IT.

22 Q. DO YOU RECALL DISCUSSING THIS ON THE
23 PHONE WITH JOEL?

24 A. AGAIN, WE TALKED ABOUT CREDITS, AND THESE
25 WERE THE SAME KIND OF GENERAL CREDITS THAT CAME UP

1 WITH JOEL ON HIS INVOICES.

2 Q. SO YOU DON'T HAVE ANY SPECIFIC
3 RECOLLECTION ABOUT DISCUSSING THIS PARTICULAR
4 PROBLEM, JUST A GENERAL RECOLLECTION DISCUSSING
5 CREDITS?

6 A. CORRECT.

7 (THEREUPON, A DOCUMENT WAS
8 MARKED AS DEFENDANT'S EXHIBIT 20 FOR
9 IDENTIFICATION.)

10 MR. MESSER: DOES YOUR EXHIBIT 20 FOR
11 IDENTIFICATION HAVE A SECOND PAGE TO IT?

12 MR. NOWAK: NO.

13 BY MR. NOWAK:

14 Q. LET ME ASK YOU TO TAKE A LOOK AT WHAT'S
15 BEEN MARKED TSI EXHIBIT NUMBER 20, AND TELL ME IF YOU
16 RECOGNIZE THAT DOCUMENT OR ITS CONTENTS.

17 A. I DO NOT RECALL THIS LETTER AT ALL.

18 Q. THE FIRST PARAGRAPH OF THE LETTER REFERS
19 TO DEDUCTIONS FOR APRIL USAGE DUE TO INCORRECT
20 BILLING AND DOUBLE BILLING.

21 MR. MESSER: CAN I HAVE A STANDING
22 OBJECTION TO YOUR READING FROM THE DOCUMENT
23 WHICH IS INCOMPLETE, APPARENTLY, HAVING NO
24 SECOND PAGE, NO SIGNATURE AND WHICH THE
25 WITNESS CANNOT AUTHENTICATE OR IDENTIFY.

1 BY MR. NOWAK:

2 Q. MY QUESTION IS: DO YOUR RECORDS REFLECT
3 A CREDIT BEING GIVEN TO TSI ACCOUNT FOR APRIL'S
4 USAGE?

5 A. ACCORDING TO MY RECORDS, THE INVOICE
6 DATED MAY 1990 WOULD BE FOR APRIL USAGE, AND I HAVE
7 POSTED HERE A PAYMENT -- A CREDIT, I'M SORRY, FOR
8 \$6,000.

9 Q. AND WHAT WAS THAT CREDIT FOR?

10 A. I DO NOT HAVE IT INDICATED ON MY
11 RECORDS.

12 Q. DO YOU RECALL WHAT IT WAS FOR?

13 A. NO, I DO NOT.

14 Q. THERE'S ALSO DISCUSSION LATER ON IN THIS
15 DOCUMENT ABOUT -- A COMPLAINT ABOUT LATE SENDING OF
16 INVOICES.

17 DO YOU RECALL EVER DISCUSSING THAT WITH
18 JOEL ESQUENAZI?

19 A. NO, I DO NOT REMEMBER.

20 Q. THERE'S ALSO A REFERENCE TO ACCOUNTS
21 WHICH WERE BILLED DIRECTLY BY TELUS AND WERE PAID TO
22 TELUS AND FOR WHICH HE NEVER GOT CREDIT.

23 DO YOU EVER RECALL DISCUSSING THAT TOPIC
24 WITH JOEL ESQUENAZI?

25 A. YES, I DO.

1 Q. AND WHAT DO YOU RECALL ABOUT THAT
2 CONVERSATION?

3 A. THERE WERE SITUATIONS WHERE CUSTOMERS
4 THAT HAD ORIGINALLY BEEN SOLD AND SIGNED BY TSI WERE
5 BILLED BY ATC DIRECTLY AS IF THEY WERE ATC CUSTOMERS.

6 Q. AND WHY WAS THAT?

7 A. TO THE BEST OF MY RECOLLECTION, IT IS
8 BECAUSE -- BECAUSE TSI USED THE SAME PIC CODE THAT
9 TELUS DID. WHEN WE GOT THE RESPONSE BACK FROM
10 SOUTHERN BELL OR FROM THE TELCO, IF THE PERSON IN
11 THAT DEPARTMENT DID NOT SEE AN ACCOUNT THAT IT COULD
12 SAY THAT THIS TELEPHONE NUMBER IS THIS ACCOUNT, IT
13 WOULD SET UP AN ACCOUNT WHERE THE TSI ACCOUNTS WERE
14 SET UP AND MAINTAINED ON A SEPARATE DATABASE OF THE
15 SAME COMPUTER. AND, SO, THE RESPONDENT PROCESS FROM
16 THE TELCO COULD HAVE LED SOMEBODY TO THINK THAT THIS
17 CUSTOMER JUST CHOSE PIC 031 TELUS AND WANTED TO BE A
18 NEW CUSTOMER.

19 Q. AND HOW WOULD THAT RESULT IN THE ISSUING
20 OF A BILL DIRECTLY TO A TSI CUSTOMER?

21 A. THAT CUSTOMER THEN, ACCORDING TO THE
22 COMPUTER, WOULD THINK IT WAS AN ATC TELUS CUSTOMER
23 AND THE TRAFFIC WOULD BE BILLED.

24 Q. DID YOU TAKE ANY ACTION TO CORRECT THAT
25 PROBLEM?

1 A. YES.

2 Q. WHAT ACTION DID YOU TAKE?

3 A. WE WOULD CANCEL OUT -- WE WOULD VERIFY
4 THAT THE TSI CONTRACT SAT IN OUR OFFICE THAT WAS ON
5 THEIR PORTION OF THE BILLING SYSTEM AND WE WOULD
6 EITHER CREDIT IN FULL THE ATC TELUS BILL OR CREDIT A
7 PORTION OF IT BACK TO JOEL -- TO TSI.

8 Q. DO YOU HAVE ANY DOCUMENTATION REFLECTING
9 THOSE CREDITS?

10 A. YES, I DO.

11 Q. BEFORE WE GET TO THAT -- BECAUSE I
12 BELIEVE WHAT YOU ARE GOING TO SHOW ME IS THIS --
13 THIS GROUP OF DOCUMENTS?

14 A. YES.

15 Q. WE'LL GET TO THAT IN A MINUTE.

16 A. OKAY.

17 Q. WAS THIS PROBLEM BEING BROUGHT TO YOUR
18 ATTENTION DEPENDENT UPON SOMEBODY AT TSI RAISING IT
19 WITH YOU?

20 A. IT WOULD HAVE TO BE, YES.

21 Q. WAS THERE ANYTHING DONE TO CORRECT THE
22 COMPUTER PROGRAM WHICH GENERATED THIS PROBLEM?

23 A. WE PUT IN WHAT WE THOUGHT WERE TWO FIXES
24 AND THAT WAS TO HAVE THE SYSTEMS -- THE TWO COMPUTER
25 SYSTEMS BUMP UP AGAINST EACH OTHER SO THAT THE SAME

1 TELEPHONE NUMBER COULDN'T BE ENTERED ON ONE SIDE IF
2 IT RESIDED ON THE OTHER SIDE TO AVOID DUPLICATE
3 SETTINGS ON BOTH CUSTOMERS.

4 THERE IS ALSO --

5 Q. BEFORE YOU GO ON -- DID EITHER OF THOSE
6 FIXES CORRECT THE PROBLEM?

7 A. I WOULD SEEM TO RECALL THAT IT REDUCED
8 THE NUMBER OF PROBLEMS. I DON'T RECALL WHETHER IT
9 ELIMINATED IT COMPLETELY.

10 Q. WHO WAS THE PERSON AT ATC RESPONSIBLE FOR
11 MAKING THOSE FIXES?

12 A. SOMEBODY IN THE IS DEPARTMENT.

13 Q. WHAT WAS THE BASIS OF YOUR BELIEF THAT
14 THESE FIXES RESULTED IN A REDUCTION OF THIS PROBLEM
15 OCCURRING?

16 A. I GUESS JUST BECAUSE IT SOUNDS LIKE
17 IT -- AS I REMEMBER BACK ON THE SITUATION THAT THAT
18 WOULD HAVE ELIMINATED OR REDUCED THE NUMBER OF
19 PROBLEMS.

20 Q. I DON'T UNDERSTAND YOUR ANSWER.

21 A. KNOWING THE FIX THAT WAS PUT IN WHERE THE
22 COMPUTER WOULDN'T LET A TELEPHONE NUMBER SIT ON BOTH
23 SIDES OF THE COMPUTER WOULD TELL ME THAT IF WE GOT
24 THE CONFIRMATION BACK FROM THE TELEPHONE COMPANY AND
25 WE TRIED TO PUT IT ON ONE SIDE OF THE BILLING, ON THE

1 ATC TELUS SIDE OF THE BILLING, IT WOULDN'T LET US IF
2 IT RESIDED ON THE OTHER SIDE OF THE BILLING. I CAN'T
3 THINK OF ANY OTHER REASON HOW -- WHY THAT WOULD
4 HAPPEN AGAIN.

5 Q. SO YOUR BELIEF THAT THE FIXES WERE
6 ACTUALLY CORRECTIVE IS BASED UPON LOGIC?

7 A. CORRECT.

8 Q. BUT NOT UPON ANY EXPERIENCE WITH THE
9 COMPUTER SYSTEM THAT THOSE FIXES WERE ACTUALLY
10 CORRECTED?

11 A. CORRECT.

12 MR. MESSER: COUNSEL, IF YOU MAY RECALL,
13 THE WITNESS TESTIFIED TO TWO FIXES. BEFORE
14 YOU GO ON, YOU MAY WANT TO --
15 BY MR. NOWAK:

16 Q. I ASSUME WE ARE TALKING ABOUT THE
17 CUMULATIVE EFFECT OF BOTH FIXES.

18 A. YES. WELL, THERE ARE -- ACTUALLY THERE
19 WERE THREE, SORT OF, FIXES THAT WE PUT INTO PLACE TO
20 TRY TO ELIMINATE THIS SITUATION.

21 ONE WAS THE READING, THE BOUNCING OFF
22 BETWEEN THE TWO SYSTEMS.

23 THE OTHER WAS THE PEOPLE THAT WERE IN
24 THIS GROUP THAT TOOK THE INFORMATION FROM THE TELCO
25 WERE NOW INSTRUCTED TO LOOK AT THE OTHER SIDE OF THE

1 COMPUTER TO SEE IF IT WAS OVER THERE BEFORE THEY SET
2 UP THE ACCOUNT.

3 AND THE THIRD FIX WAS BECAUSE -- AND I
4 BELIEVE THIS HAPPENED EARLY ON IN THE RELATIONSHIP,
5 BECAUSE I SEEM TO RECALL THIS FIX BEING PUT IN VERY
6 EARLY -- BECAUSE TSI SOLD CUSTOMERS THAT WERE
7 PREVIOUSLY TELUS CUSTOMERS, THE TELEPHONE NUMBER WAS
8 NEVER REMOVED FROM THE TELUS BILLING SYSTEM, IT
9 STAYED THERE, IT NEVER WAS REMOVED.

10 SO WHEN TRAFFIC BEGAN, IT FIRST WENT TO
11 OUR BILLING SYSTEM AND LOOKED AND THEN TSI ACTIVE
12 CUSTOMERS WOULD BE BILLED THROUGH ATC, AND THE FIX
13 FOR THAT WAS THAT THE TRAFFIC FOR TSI AND THIS OTHER
14 RESELLER WERE ALWAYS PULLED OFF THE SWITCHES FIRST,
15 THEIR CALLS WERE PULLED AND THEN THE REMAINING CALLS
16 WERE PASSED OVER TO THE TELUS BILLING SYSTEM.

17 Q. HOW DO YOU KNOW ABOUT THESE FIXES?

18 A. I WAS TOLD THEY HAPPENED.

19 Q. YOU WERE TOLD BY SOMEBODY IN IS?

20 A. YES.

21 Q. DO YOU RECALL WHO?

22 A. NO, I DO NOT.

23 Q. SO, YOU DON'T HAVE ANY DIRECT PERSONAL
24 KNOWLEDGE ABOUT THIS; THIS IS JUST WHAT PEOPLE TOLD
25 YOU?

1 A. CORRECT.

2 Q. GOING BACK TO TSI EXHIBIT NUMBER 13 TO
3 YOUR DEPOSITION, WAS THIS A DOCUMENT THAT WAS CREATED
4 BY YOU?

5 A. YES, IT WAS.

6 Q. AND THIS IS YOUR WORKSHEET TO KEEP TRACK
7 OF PAYMENTS, CREDITS AND BALANCES?

8 A. THAT'S CORRECT.

9 Q. ON THE TSI ACCOUNT?

10 A. THAT'S CORRECT.

11 Q. AND THE DATE OF THIS IS MARCH 13TH?

12 A. YES, IT IS.

13 Q. CAN YOU EXPLAIN THE COVER PAGE TO ME?

14 A. THIS WAS AT THE POINT IN MY HANDLING OF
15 THE ACCOUNT WHERE IT WAS -- OKAY, LET'S AGREE UPON
16 THE BALANCE AND SET UP A PAYMENT ARRANGEMENT FOR IT.
17 AND IF WE -- AND I WAS ASKING HIM TO SIGN IF HE
18 CONCURRED WITH THE PAYMENT ARRANGEMENTS AND THE
19 AMOUNT DUE, AND SIGN IT AND FAX IT BACK SO WE WOULD
20 HAVE A PAYMENT SCHEDULE.

21 Q. AND THE AMOUNT DUE, ACCORDING TO THIS
22 WORKSHEET ON -- AS A RESULT OF THE USAGE THROUGH
23 FEBRUARY '91 WAS \$164,432 AND SOME CHANGE, CORRECT?

24 A. THAT WAS THE AMOUNT DUE OF THAT
25 INDIVIDUAL INVOICE FOR A TOTAL AMOUNT DUE OF

1 \$165,164.35.

2 Q. WHERE IS THAT?

3 A. READING ACROSS. THAT WAS THE INDIVIDUAL
4 INVOICE LESS PAYMENTS LESS CREDITS FOR A TOTAL AMOUNT
5 DUE OF 165,000.

6 Q. I DON'T HAVE THE HANDWRITTEN PART, I
7 GUESS.

8 A. IT'S NOT HANDWRITTEN (INDICATING). IT'S
9 FOLLOWING THIS TYPED LINE ACROSS TO SHOW THAT THE
10 BALANCE DUE AT THAT POINT --

11 Q. LET ME MARK THIS AS ANOTHER EXHIBIT.
12 (THEREUPON, A DOCUMENT WAS
13 MARKED AS DEFENDANT'S EXHIBIT 21 FOR
14 IDENTIFICATION.)

15 BY MR. NOWAK:

16 Q. THIS IS A VERSION OF THAT DOCUMENT WHICH
17 WAS MARKED AS PLAINTIFF'S EXHIBIT NO. 9 IN JOEL
18 ESQUENAZI'S DEPOSITION. CAN YOU TELL ME FROM LOOKING
19 AT THESE TWO VERSIONS WHICH ONE WAS ACTUALLY FAXED TO
20 JOEL ESQUENAZI?

21 A. NO, I CANNOT TELL YOU.

22 Q. CAN YOU TELL ME WHEN THE CORRECTION FROM
23 164 AND CHANGE TO 165,000 AND CHANGE WAS MADE?

24 A. NO, I DO NOT RECALL.

25 Q. DID JOEL ESQUENAZI SIGN THIS AND FAX IT

1 BACK TO YOU?

2 A. I DO NOT RECALL WHAT HE SIGNED AND FAXED
3 BACK TO ME, BUT HE DID SIGN SOMETHING, BECAUSE
4 LOOKING THROUGH MY FILES THERE WAS A BREAKDOWN OF THE
5 WHOLE AMOUNT AND WHEN PAYMENTS WERE GOING TO BE MADE,
6 SO I ASSUME SOMETHING WAS FAXED BACK TO ME.

7 (THEREUPON, A DOCUMENT WAS
8 MARKED AS DEFENDANT'S EXHIBIT 22 FOR
9 IDENTIFICATION.)

10 BY MR. NOWAK:

11 Q. DO YOU RECOGNIZE TSI EXHIBIT NUMBER 22?

12 A. RECOGNIZE IT, NO, BUT I REMEMBER SEEING
13 IT IN MY TIME WHEN I WENT THROUGH IT YESTERDAY.

14 Q. SO YOU HAVE A COPY OF THIS IN YOUR FILE?

15 A. YES.

16 Q. SO YOU DID RECEIVE IT?

17 A. YES.

18 Q. ON OR ABOUT MARCH 13TH, 1991?

19 A. I WOULD ASSUME SO.

20 Q. AND THE FIRST SENTENCE IN THE LETTER IS
21 JOEL SAYING THAT THERE IS A BIG DISCREPANCY BETWEEN
22 YOUR ACCOUNTING AND THE AMOUNT HE THINKS HE OWES
23 YOU?

24 A. THAT'S CORRECT.

25 Q. AND THE AMOUNT HE THINKS HE OWES YOU IS

1 \$155,008.87?

2 A. THAT'S CORRECT.

3 Q. DID YOU AGREE WITH THAT AMOUNT?

4 A. I NEVER -- DID I AGREE? I DID NOT AGREE
5 WITH THAT AMOUNT, BUT I AGREED TO PUT \$10,000 INTO AN
6 UNSETTLED DISPUTE WHERE I WOULD LEAVE A BALANCE OF
7 \$154,532.65.

8 Q. EXPLAIN THAT TO ME.

9 A. WE HAD, AS I RECALL, REACHED A STANDOFF
10 AS TO WHAT THE AMOUNT WAS, AND I AGREED TO PUT
11 \$10,000 AS AN UNSETTLED DISPUTE AND MAKE PAYMENT
12 ARRANGEMENTS ON THE UNDISPUTED PORTION OF THE
13 INVOICES OF THE BALANCE DUE.

14 Q. AND WHERE WAS THIS \$10,000 GOING TO BE
15 RESIDING?

16 A. I DON'T RECALL, BUT I WOULD PROBABLY
17 CREDIT IT OUT AT THE END OF FULL PAYMENT. I WASN'T
18 LOOKING TO GET PAYMENT ARRANGEMENTS ON THAT DISPUTED
19 AMOUNT OF THE BILL.

20 Q. WHERE DID THE -- SO THIS WAS A \$10,000
21 DISCOUNT, IN EFFECT?

22 A. IT WAS WHERE --

23 Q. -- IS THAT IT?

24 A. -- I NEVER SOUGHT PAYMENT FOR THAT
25 \$10,000.

1 Q. SO, IT WAS A DE FACTO CREDIT?

2 A. GOOD WILL CREDIT.

3 Q. AND THAT WAS A CREDIT OF \$10,000 OFF THE
4 \$164,000 AMOUNT?

5 A. CORRECT.

6 Q. WHERE DID YOU GET THE \$164,000 AMOUNT?

7 A. EVIDENTLY FROM MY SHEETS.

8 Q. WHERE DID THESE NUMBERS COME FROM,
9 THOUGH?

10 A. THEY WERE THE AMOUNTS OF THE INVOICES
11 BILLED LESS THE PAYMENTS AND CREDITS PREVIOUSLY
12 GIVEN.

13 Q. SO TELL ME IF I'M READINGS THIS
14 CORRECTLY. AND THIS IS -- PLAINTIFF'S EXHIBIT
15 NUMBER 21 OR NUMBER 13, WHICHEVER YOU CHOOSE. THE
16 BOTTOM LINE OF THAT WORKSHEET OF YOURS --

17 A. UH-HUH.

18 Q. -- IS DATED FEBRUARY '91?

19 A. CORRECT.

20 Q. AND WHAT DOES THE AMOUNT DUE COLUMN
21 SIGNIFY?

22 A. 164,432.64.

23 Q. NO, THE FIRST COLUMN RIGHT AFTER THE
24 DATE.

25 A. THE AMOUNT DUE WOULD BE THE CURRENT USAGE

1 ON THE INVOICES.

2 Q. SO THAT WOULD BE FOR FEBRUARY USAGE?

3 A. FEBRUARY 1991 WOULD BE JANUARY'S USAGE.

4 WHAT HE WAS INVOICED FOR IN FEBRUARY WOULD HAVE BEEN
5 JANUARY'S USAGE.

6 Q. SO -- YOU ARE LOSING ME HERE.

7 THIS MEMO IS DATED MARCH 13, 1991.

8 A. RIGHT.

9 Q. SO WHAT YOU ARE SAYING IS THE LINE ITEM
10 FOR FEBRUARY '91 WOULD HAVE BEEN FOR \$42,890.44,
11 REPRESENTING JANUARY USAGE?

12 A. CORRECT.

13 Q. AND THEN IT SHOWS A PAYMENT AND A CREDIT
14 RESULTING IN A BALANCE OF \$164,432.64?

15 A. CORRECT.

16 MR. SELF: CAN WE GO OFF THE RECORD A
17 MINUTE?

18 MR. NOWAK: SURE.

19 (INFORMAL DISCUSSION OFF THE RECORD.)

20 THE WITNESS: OKAY. IT WAS THE USAGE --
21 THE DATE COLUMN ON HERE WAS THE ACTUAL USAGE
22 MONTH, NOT THE INVOICE MONTH. SO, IF IT SAYS
23 FEBRUARY '91 USAGE, IT WAS USAGE FOR THAT
24 FEBRUARY TIME FRAME.

25 BY MR. NOWAK:

1 Q. SO IT WOULD BE FOR THE MONTH OF FEBRUARY
2 1991?

3 A. CORRECT.

4 Q. NOW, WHAT DO YOU HAVE IN YOUR HAND
5 THERE?

6 A. COPIES OF THE INVOICES.

7 Q. WHICH IS TSI EXHIBIT NUMBER --

8 A. 16.

9 Q. WOULD YOU PLEASE TURN TO FEBRUARY USAGE.
10 FEBRUARY 1991 IN TSI COMPOSITE NUMBER 16.

11 A. USAGE PERIOD FEBRUARY OR INVOICE
12 FEBRUARY?

13 Q. WELL, THE INVOICE WAS DATED MARCH 7,
14 1991, CORRECT?

15 A. YES.

16 Q. SO YOU WOULD HAVE HAD THAT INFORMATION ON
17 MARCH 13, 1991, CORRECT?

18 A. YES.

19 Q. AND WHAT DOES THE MARCH 7, 1991 INVOICE
20 REFLECTING USAGE FOR THE MONTH OF FEBRUARY INDICATE
21 WHAT THE AMOUNT DUE WAS ON THAT INVOICE?

22 A. THE TOTAL AMOUNT DUE IS 252,519.73.

23 Q. AND THE CURRENT BALANCE?

24 A. CURRENT BALANCE, \$43,222.15.

25 Q. SO DO YOU RECALL WHERE YOU GOT THE NUMBER

1 \$42,890.44 FROM?

2 A. NO, I DO NOT RECALL. I RECALL MY METHOD
3 WAS TO EITHER RECEIVE A PHONE CALL OR MAKE A PHONE
4 CALL TO THE PERSON IN THE BILLING DEPARTMENT TO ASK
5 WHAT THE CURRENT BILL WAS.

6 Q. WOULD THAT BE WHERE YOU WOULD HAVE GOTTEN
7 THE \$164,000 AMOUNT FROM?

8 A. I BELIEVE I KEPT THIS RECORD ALL ALONG ON
9 MY OWN AND JUST WORKED MY OWN NUMBERS.

10 Q. THE PREVIOUS MONTH'S BALANCE FOR JANUARY
11 OF 1991 REFLECTS A BALANCE DUE OF \$233,123.93,
12 CORRECT --

13 A. I'M SORRY --

14 Q. -- ON YOUR WORKSHEET?

15 A. RIGHT.

16 Q. AND THE INVOICE DATED FEBRUARY 11, 1991,
17 FOR JANUARY '91 USAGE INDICATES THE TOTAL AMOUNT DUE
18 OF -- WHAT?

19 A. \$208,897.58.

20 Q. DO YOU KNOW WHERE YOU GOT THE NUMBER
21 \$233,123.93 CENTS FROM?

22 A. WORKING MY SPREADSHEET WITH THE
23 INFORMATION.

24 Q. NOT FROM THE INVOICE?

25 A. NO.

1 ((THEREUPON, A DOCUMENT WAS
2 MARKED AS DEFENDANT'S EXHIBIT 23 FOR
3 IDENTIFICATION.)

4 BY MR. NOWAK:

5 Q. WHAT HAVE YOU DISCOVERED THERE?

6 A. WE CATCH UP AND OUR AMOUNTS MATCH. BY
7 APRIL WE ARE TO THE PENNY TO THE INVOICE AND MY
8 WORKSHEET.

9 Q. BUT THERE WAS A LITTLE GLITCH THERE?

10 A. YES, THERE WAS.

11 Q. HERE'S THE NEXT ONE AND THIS IS SOMETHING
12 ELSE I PULLED OUT OF YOUR FILE, AND I BELIEVE YOU
13 HAVE YOUR COPY IN FRONT OF YOU, TSI EXHIBIT NUMBER
14 23. CAN YOU TELL ME WHAT THAT IS?

15 MR. MESSER: BEFORE WE GET TO 23, CAN WE
16 TAKE A FIVE-MINUTE BREAK.

17 MR. NOWAK: ABSOLUTELY.

18 (THEREUPON, A SHORT RECESS WAS OBSERVED
19 BY ALL PARTIES PRESENT.)

20 (THEREUPON, A DOCUMENT WAS
21 MARKED AS DEFENDANT'S EXHIBIT 24 FOR
22 IDENTIFICATION.)

23 BY MR. NOWAK:

24 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT'S
25 BEEN MARKED TSI EXHIBIT NUMBER 24 TO YOUR DEPOSITION

1 LOOK. AND IT APPEARS TO BE DIFFERENT THAN THE NUMBER
2 THAT YOU ASKED HIM TO AGREE TO ON THE SAME DAY OF
3 \$164,432.

4 A. IT COULD HAVE BEEN EARLIER IN THE DAY. I
5 DON'T KNOW. I REMEMBER GOING THROUGH SOME
6 PAINSTAKING PROCESSES TO GET TO AN AGREED-UPON
7 BALANCE, AND THAT WOULD HAVE BEEN THIS SHEET HERE
8 (INDICATING) --

9 MR. MESSER: WAIT A MINUTE. IDENTIFY
10 WHEN YOU SAY "THIS SHEET."

11 THE WITNESS: OKAY, EXHIBIT NUMBER 23,
12 WHERE I HAVE \$164,432.65 AS THE BALANCE OF THE
13 FEBRUARY INVOICE, LESS THE \$10,000 UNSETTLED
14 DISPUTE, FOR A TOTAL AMOUNT OF 154,432.65, AND
15 I RECALL THIS BEING THE AGREED-UPON AMOUNT DUE
16 AND THE PAYMENT ARRANGEMENTS THAT WERE MADE TO
17 SATISFY THE DEBT.

18 BY MR. NOWAK:

19 Q. BUT YOU DON'T RECALL WHERE YOU GOT THAT
20 \$164,000 FIGURE FROM?

21 A. NO. NO, I DO NOT RECALL.

22 Q. IN THE SECOND PARAGRAPH IT SAYS, "UNTIL A
23 SATISFACTORY PAYMENT SCHEDULE IS RECEIVED, ATC WILL
24 DISCONTINUE PROCESSING ORDERS FOR TSI."

25 MY QUESTION IS: WAS A SATISFACTORY

1 PAYMENT SCHEDULE RECEIVED?

2 A. YES, IT WAS.

3 Q. THE NEXT SENTENCE SAYS, "I AM SETTING UP
4 A MEETING FOR NEXT WEEK TO GATHER THE INFORMATION YOU
5 ARE REQUESTING REGARDING THE BILLING TAPE."

6 A. I'M SORRY, I LOST IT. OH, OKAY.

7 Q. DO YOU KNOW WHAT THAT'S A REFERENCE TO?

8 A. YES, I DO RECALL THIS.

9 THIS WAS WHEN WE HAD BEEN TALKING ABOUT
10 THE CONVERSION TO THE NEW BILLING PLATFORM WHERE THE
11 INITIAL TALKS WERE THAT TSI WAS GOING TO RECEIVE A
12 BILLING TAPE AND THEY WERE GOING TO BE BILLING THEIR
13 OWN CUSTOMERS AND I WAS GOING TO GIVE THEM THE
14 SPECIFICATIONS ON THE TAPE AND A TEST TAPE ON IT.

15 Q. AND WAS THAT ACCOMPLISHED?

16 A. I DO NOT REMEMBER. I REMEMBER SEEING IN
17 MY FILES YESTERDAY THE FORMAT OF WHAT WOULD BE ON THE
18 TAPE, SO -- I ASSUME IT WAS ACCOMPLISHED.

19 Q. (INDICATING).

20 A. YES.

21 (THEREUPON, A DOCUMENT WAS
22 MARKED AS DEFENDANT'S EXHIBIT 25 FOR
23 IDENTIFICATION.)

24 BY MR. NOWAK:

25 Q. TSI EXHIBIT NUMBER 25, DO YOU RECOGNIZE

1 THAT DOCUMENT?

2 A. YES, I DO.

3 Q. AND WHAT IS IT?

4 A. THIS IS A STANDARD TAPE FORMAT GIVING
5 INFORMATION AS TO WHAT LENGTH -- WHAT INFORMATION
6 WOULD BE ON A BILLING TAPE, THE ACCOUNT NUMBER, THE
7 A&I, THE AUTH CODE AND THE CHARACTER FIELDS THAT
8 WOULD BE INCLUDED IN EACH RECORD.

9 Q. AND THIS WAS A -- IN LIEU OF A HARD COPY
10 OF BILLING INFORMATION GENERATED FROM ATC'S SYSTEM?

11 A. TO THE BEST OF MY RECOLLECTION, THIS WAS
12 THE FIRST STEP BY WHICH WE WERE GOING TO THE
13 TRANSITION FROM ATC BILLING TSI CUSTOMERS TO TSI
14 BILLING THEIR OWN CUSTOMERS.

15 Q. I THOUGHT TSI WAS ALREADY BILLING THEIR
16 OWN CUSTOMERS?

17 A. WE PREPARED THE INVOICES FOR THEM,
18 THOUGH.

19 Q. SO THIS WAS A STEP TOWARDS HAVING TSI
20 ASSUME THE RESPONSIBILITY OF GENERATING THEIR OWN
21 INVOICES FOR THEIR OWN CUSTOMERS?

22 A. CORRECT.

23 Q. DO YOU KNOW IF THAT WAS EVER
24 ACCOMPLISHED?

25 A. TSI BILLING THEIR OWN CUSTOMERS?

1 Q. YES.

2 A. NO, I DO NOT BELIEVE IT WAS ACCOMPLISHED.

3 Q. NOT ON YOUR WATCH, ANYWAY?

4 A. NOT ON MY WATCH.

5 (THEREUPON, A DOCUMENT WAS
6 MARKED AS DEFENDANT'S EXHIBIT 26 FOR
7 IDENTIFICATION.)

8 BY MR. NOWAK:

9 Q. PLEASE TAKE A LOOK -- THIS IS FROM YOUR
10 FILE, A HANDWRITTEN NOTE FROM YOUR FILE, TSI EXHIBIT
11 NUMBER 26, AND SOME OF THE FIGURES ON THERE ARE
12 FAMILIAR TO ME AND I WAS WONDERING IF THEY WERE
13 FAMILIAR TO YOU.

14 A. 154,432.62 IS FAMILIAR.

15 Q. AND THAT NUMBER IS --

16 A. THE BOTTOM LINE THAT WE SETTLED ON FOR
17 THE AMOUNT DUE. THAT'S REFERRED TO IN EXHIBIT 23.

18 Q. NOW, IN THE UPPER RIGHT-HAND CORNER THERE
19 IS A HANDWRITTEN NOTATION ABOUT SOMETHING. CAN YOU
20 READ THAT FOR ME? IS THAT YOUR HANDWRITING?

21 A. YES, IT IS. THERE IS A DOLLAR AMOUNT AND
22 LOST CUSTOMER.

23 Q. WHAT DOES THAT REFER TO?

24 A. I DON'T RECALL. AND THEN \$11,591.11
25 UNANSWERED CALLS, DOUBLE BILLED.

- 1 Q. AND THE FIRST NUMBER IS --
- 2 A. \$9,990.62.
- 3 Q. AND HAS A NOTATION TO LOST CUSTOMER?
- 4 A. CORRECT.
- 5 Q. DO YOU RECALL WHAT THESE ITEMS AND
- 6 NOTATIONS ARE ABOUT?
- 7 A. LOOKING AT IT, IT APPEARS TO BE CREDITS I
- 8 WAS GOING TO ISSUE TO THE INITIAL AMOUNT OF
- 9 \$186,014.37. YES, THAT'S WHAT IT WAS.
- 10 Q. FOR THOSE ITEMS?
- 11 A. CORRECT.
- 12 Q. DO YOU RECALL ANY DETAILS ABOUT THOSE
- 13 CREDITS?
- 14 A. NO, I DON'T.
- 15 Q. DO YOU RECALL IF THEY WERE ISSUED? OR DO
- 16 YOU HAVE ANY RECORD THAT INDICATES THAT THEY WERE
- 17 ISSUED?
- 18 A. I HAVE A CREDIT ON MY BALANCE SHEET IN
- 19 THE AMOUNT OF \$21,581.73.
- 20 Q. WHICH IS THE COMBINATION OF THOSE TWO
- 21 AMOUNTS?
- 22 A. YES, IT IS.
- 23 Q. YOU DID ISSUE A CREDIT FOR THAT?
- 24 A. YES, I DID.
- 25 Q. AGAINST WHAT INVOICE?

1 A. I HAVE IT POSTED AGAINST THE USAGE FOR
2 FEBRUARY 1991.

3 Q. DO YOU KNOW IF THAT CREDIT APPEARED
4 ANYWHERE ON AN INVOICE OR STATEMENT, CREDIT MEMO,
5 SOMETHING LIKE THAT?

6 A. CAN I LOOK AT THE OTHER EXHIBIT?

7 Q. ABSOLUTELY.

8 A. YES, IT WAS POSTED AGAINST THE INVOICE
9 DATED MAY 15TH, 1991 FOR THE SERVICE PERIOD OF APRIL
10 1 THROUGH APRIL 30, 1991. AND IT'S LISTED UNDER
11 CREDIT ONE MINUTE -- NO ANSWER CALLS FOR SEVEN MONTHS
12 IN PARENTHESES.

13 (THEREUPON, A DOCUMENT WAS
14 MARKED AS DEFENDANT'S EXHIBIT 27 FOR
15 IDENTIFICATION.)

16 BY MR. NOWAK:

17 Q. PLEASE TAKE A LOOK AT WHAT'S BEEN MARKED
18 TSI EXHIBIT NUMBER 27 FOR YOUR DEPOSITION AND TELL ME
19 IF YOU RECOGNIZE THESE DOCUMENTS. THIS IS A
20 THREE-PAGE COMPOSITE.

21 A. YES, I RECOGNIZE THESE DOCUMENTS.

22 Q. THE FIRST PAGE OF TSI EXHIBIT NUMBER 27
23 COMPOSITE IS DATED APRIL 11, 1991. IS THAT YOUR
24 INITIAL SIGNATURE NEXT TO YOUR NAME THERE?

25 A. YES, IT IS.

1 Q. AND THIS CONCERNS THE \$21,581.73 CREDIT
2 WE JUST DISCUSSED?

3 A. CORRECT.

4 Q. AND IT SAYS IT'S A -- FOR SEVEN MONTHS
5 OF ONE-MINUTE CALLS AND NO ANSWER CALLS.

6 A. CORRECT.

7 Q. AND THAT WOULD BE SEVEN MONTHS PRIOR TO
8 MARCH?

9 A. PRIOR TO JANUARY OF 1991.

10 Q. PRIOR TO JANUARY? OKAY, SO THAT WOULD BE
11 BACK TO --

12 A. JULY 1990.

13 Q. JULY 1990.

14 HOW IS IT THAT THE SEVEN MONTHS OF
15 ONE-MINUTE CALLS AND NO ANSWER CALLS CAME TO YOUR
16 ATTENTION IN JANUARY?

17 A. THIS WAS DURING THE PERIOD WHERE I WASN'T
18 SERVICING THIS END OF THE ACCOUNT AGAIN, AND FROM MY
19 SPREADSHEET IT INDICATES THAT I WAS GIVING CREDITS ON
20 A PRETTY -- MONTHLY -- REGULAR BASIS, AND WE GO SEVEN
21 MONTHS WHERE NO ONE EVER ISSUED ANY CREDITS ON THE
22 ACCOUNT, AND IT APPEARS I WENT BACK AND ISSUED THE
23 CREDIT FOR THAT WHOLE PERIOD OF TIME.

24 Q. DO YOU KNOW WHAT HAPPENED DURING THAT
25 SEVEN MONTHS?

1 A. SOMEBODY ELSE WAS SUPPOSED TO BE HANDLING
2 THE ACCOUNT.

3 Q. THE SECOND PAGE IS DATED MAY 10TH, 1991,
4 AND IT REFERS TO A \$21,375.85 CREDIT TO THE APRIL
5 INVOICE DUE TO A MISCALCULATION OF INTERNATIONAL
6 CALLS FROM HIS FIRST BILL IN 1989 THROUGH JUNE OF
7 1990.

8 DO YOU KNOW WHAT THAT REFERS TO?

9 A. I DO NOT REMEMBER THE DETAILS OF ISSUING
10 THIS, BUT THIS WAS THE POINT IN TIME WHERE I WAS
11 TRYING TO RECONCILE THE ACCOUNT AND GET IT TO THE
12 AGREED-UPON FIGURE.

13 Q. DO YOU KNOW WHAT THE MISCALCULATION OF
14 INTERNATIONAL CALLS WAS?

15 A. I DO NOT RECALL THAT.

16 Q. AND THE FIRST BILL IN 1989, IS THAT A
17 REFERENCE TO THE FIRST PAGE OF TSI COMPOSITE EXHIBIT
18 18?

19 A. I WOULD BELIEVE SO, YES, SIR.

20 Q. SO THAT WOULD BE FROM THE PERIOD JULY
21 1989 THROUGH JUNE 1990?

22 A. CORRECT.

23 Q. WHICH IS -- IF I'M NOT MISTAKEN -- A
24 YEAR?

25 A. YES.

1 Q. HOW DID THIS MISCALCULATION COME TO YOUR
2 ATTENTION?

3 A. I HAVE NO RECOLLECTION OF THIS.

4 Q. DID THIS CREDIT SHOW UP ON AN INVOICE?

5 A. YES, IT DID.

6 Q. SO IT WAS ISSUED?

7 A. YES, IT WAS. IT WAS POSTED AGAINST THE
8 INVOICE DATED MAY 15TH, 1991 FOR THE SERVICE PERIOD
9 APRIL 1 THROUGH APRIL 30TH OF 1990, AND IT'S A LINE
10 ITEM THAT SAYS CREDIT INTERNATIONAL 10 OF 1989.

11 Q. AND THE LAST PAGE OF COMPOSITE EXHIBIT
12 NUMBER 27 IS ANOTHER CREDIT MEMO INITIALED BY YOU,
13 CORRECT?

14 A. CORRECT.

15 Q. AND DATED JULY 11TH, 1991?

16 A. CORRECT.

17 Q. FOR \$22,492.77.

18 A. THAT'S CORRECT.

19 Q. DUE TO DOUBLE BILLING ON THE MARCH AND
20 APRIL STATEMENTS AND AN INVOICING ERROR WHERE THE
21 TRAFFIC SUMMARY SHOWED MORE USAGE THAN --

22 A. THAT'S WHAT IT SAYS.

23 Q. WHAT IS THE REFERENCE FROM THE MARCH AND
24 APRIL STATEMENTS?

25 A. I DON'T RECALL.

1 Q. WHAT IS THE ERROR WHERE THE TRAFFIC
2 SUMMARY SHOWED MORE USAGE THAN THE INVOICE?

3 A. I DO NOT REMEMBER.

4 Q. WHAT IS THE TRAFFIC SUMMARY?

5 A. GREEN BAR SUMMARY, I ASSUME.

6 Q. YOU ASSUME, BUT YOU DON'T KNOW?

7 A. CORRECT.

8 Q. IF THE TRAFFIC SUMMARY WERE THE GREEN BAR
9 SUMMARY PAGE, WHY WOULD IT BE AN ERROR FOR THAT
10 SUMMARY TO SHOW MORE USAGE THAN THE CUSTOMER'S
11 INVOICE?

12 A. I DON'T KNOW.

13 MR. SELF: STILL LOOKING AT EXHIBIT 27?

14 MR. NOWAK: YES.

15 BY MR. NOWAK:

16 Q. ALL THREE OF THESE CREDIT MEMOS ARE
17 CO-SIGNED BY SOMEBODY AT THE BOTTOM. CAN YOU TELL ME
18 WHO THAT SIGNATURE --

19 A. DENNIS SICKLE.

20 Q. THE VICE-PRESIDENT --

21 A. OF CUSTOMER SERVICE AT THE TIME.

22 Q. AND HE'S THE ONE THAT WOULD BE REQUIRED
23 TO AUTHORIZE A CREDIT OVER CERTAIN AMOUNTS?

24 A. THAT'S CORRECT.

25 Q. WERE THESE CREDITS OVER THAT AMOUNT?

1 A. OBVIOUSLY SO.

2 Q. DO THE AMOUNTS THAT ARE REFLECTED ON
3 THESE CREDIT MEMOS INDICATE TO YOU WHAT THE AMOUNT
4 WAS?

5 A. OVER \$20,000.

6 MR. SELF: IS THAT A GUESS?

7 THE WITNESS: THAT'S A GUESS.

8 BY MR. NOWAK:

9 Q. DO YOU RECALL THESE ARE THE ONLY THREE
10 WRITTEN CREDIT MEMOS THAT WERE AUTHORIZED BY DENNIS
11 SICKLE?

12 A. I DO NOT RECALL IF THERE WERE ANY OTHERS.

13 Q. WAS THE LAST CREDIT OF \$22,492.77
14 REFLECTED ON AN INVOICE?

15 A. YES, IT WAS. IT WAS ON THE INVOICE DATED
16 JULY 12TH, 1991 FOR SERVICE FROM JUNE 1 THROUGH JUNE
17 30. IT SAYS A LINE ITEM CREDIT, DOUBLE BILLING,
18 22,492.77.

19 Q. HOW WERE THESE CREDITS COMMUNICATED TO
20 THE INFORMATION SERVICES DEPARTMENT SO THEY COULD BE
21 REFLECTED ON THE INVOICE, DO YOU KNOW?

22 A. THESE WERE REFLECTED -- THE FIRST TWO
23 ARE ADDRESSED TO LAURIE WAITE, WHO WAS THE MANAGER IN
24 FINANCE. THE LAST ONE IS DIRECTED TO SHARON
25 COPELAND, WHO IS THE ACTUAL PERSON IN THE FINANCE

1 DEPARTMENT THAT MADE UP THIS MANUAL BILL. THIS IS A
2 MANUAL BILL.

3 Q. THIS MANUAL BILL -- MEANING THE POST
4 OCTOBER 7, 1990 INVOICES WHICH ARE IN THE LATTER PART
5 OF TSI COMPOSITE EXHIBIT 16?

6 A. CORRECT.

7 Q. EARLIER YOU INDICATED TO ME THAT YOU WERE
8 ISSUING PRETTY REGULAR CREDITS IN THE TSI ACCOUNT.

9 A. ACCORDING TO MY WORKSHEET, YES.

10 Q. UNTIL THERE WAS A GAP WHERE YOU WERE NOT
11 INVOLVED SO MUCH ANYMORE.

12 A. THAT'S CORRECT.

13 Q. RATHER THAN ISSUE CREDITS EVERY MONTH,
14 DID YOU TAKE ANY STEPS TO ALLEVIATE THE PROBLEM WHICH
15 NECESSITATED GIVING THE CREDIT?

16 A. I WAS NOT INVOLVED WITH THE ACCOUNT IN
17 ANY PHASE OTHER THAN THE SERVICE ORDERING, ENTERING
18 THEM INTO THE SWITCH PART OF IT.

19 Q. SO THE ANSWER WOULD BE NO?

20 A. THE ANSWER IS NO.

21 (THEREUPON, A DOCUMENT WAS
22 MARKED AS DEFENDANT'S EXHIBIT 28 FOR
23 IDENTIFICATION.)

24 BY MR. NOWAK:

25 Q. PLEASE TAKE A LOOK AT TSI EXHIBIT NUMBER

1 28, AND ALTHOUGH IT IS NOT ADDRESSED TO YOU AND IS
2 DATED SEPTEMBER 5TH, 1991, CAN YOU TELL ME IF YOU
3 HAVE EVER SEEN THAT DOCUMENT.

4 A. I'VE NEVER SEEN THIS DOCUMENT BEFORE,
5 THAT I RECALL.

6 Q. AND THIS WOULD HAVE BEEN, IN ANY EVENT,
7 BEYOND THE TIME WHEN YOU WERE --

8 A. YES, IT WOULD HAVE BEEN.

9 Q. -- INVOLVED IN ANY WAY WITH TSI?

10 A. CORRECT. I'M SORRY, I HAVE TO REPHRASE
11 THAT.

12 SOMEWHERE IN THIS SUMMER TIME FRAME WAS
13 WHEN I WAS INVOLVED ONLY TO -- BECAUSE THIS MIAMI
14 COMPUTER WAS GOING TO CONVERT AND GO AWAY AND I WAS
15 INVOLVED WITH HOW ARE WE GOING TO TRANSITION THESE
16 ACCOUNTS, WHAT ARE THESE TWO RESELLERS GOING TO DO TO
17 GET THEIR BILLING OR BILL THEIR OWN CUSTOMERS? BUT
18 IT WAS JUST BECAUSE I WAS THE ONLY ONE AROUND THAT
19 UNDERSTOOD THE WORKINGS OF THEIR SYSTEM. BUT I HAD
20 NO OTHER -- NO DAY-TO-DAY INVOLVEMENT WITH THEM.

21 (THEREUPON, A DOCUMENT WAS
22 MARKED AS DEFENDANT'S EXHIBIT 29 FOR
23 IDENTIFICATION.)

24 BY MR. NOWAK:

25 Q. WOULD YOU TAKE A LOOK AT TSI EXHIBIT

1 NUMBER 29, IF YOU WOULD, AND TELL ME IF YOU RECOGNIZE
2 THAT DOCUMENT.

3 A. YES, I RECOGNIZE THIS DOCUMENT.

4 Q. AND WHAT IS IT?

5 A. THIS WAS A MEMO FROM MYSELF TO LORI RICE
6 WHO AT THE TIME WAS A COLLECTION SUPERVISOR AT THE
7 MIAMI OFFICE; AND SHE IS GIVING ME A LIST OF ACCOUNTS
8 BEING BILLED ON THE ATC BILLING SYSTEM THAT HAVE BEEN
9 IDENTIFIED AS TSI ACCOUNTS.

10 Q. AND THIS IS THE PROBLEM THAT WE
11 PREVIOUSLY DISCUSSED ABOUT SOME TSI CUSTOMERS GETTING
12 BILLS DIRECTLY FROM ATC?

13 A. CORRECT.

14 Q. AND THE DATE OF THIS --

15 A. JUNE 28TH, 1990.

16 Q. AND DID YOU TAKE ANY ACTION --
17 CORRECTIVE ACTION -- AS A RESULT OF THIS MEMO?

18 A. I DO NOT RECALL.

19 Q. OKAY.

20 A. THIS IS MY HANDWRITING ALL OVER IT, BUT I
21 DON'T RECALL.

22 (THEREUPON, A DOCUMENT WAS
23 MARKED AS DEFENDANT'S EXHIBIT 30 FOR
24 IDENTIFICATION.)

25 BY MR. NOWAK:

1 Q. COULD YOU TAKE A LOOK AT WHAT'S MARKED
2 TSI EXHIBIT 30 TO YOUR DEPOSITION AND TELL ME IF YOU
3 RECOGNIZE THAT DOCUMENT.

4 A. I RECOGNIZE IT AS A BILL TO A CUSTOMER
5 FROM ATC LONG DISTANCE.

6 Q. DO YOU KNOW WHY IT'S IN YOUR FILE?

7 A. NO, I DO NOT.

8 Q. DO YOU KNOW IF ANY ACTION WAS TAKEN ON
9 THAT ACCOUNT?

10 A. NO, I DO NOT RECALL.

11 Q. THE HANDWRITTEN NOTATIONS AT THE BOTTOM
12 OF THE PAGE, DO YOU RECOGNIZE THE HANDWRITING?

13 A. NO, IT IS NOT MY HANDWRITING.

14 (THEREUPON, A DOCUMENT WAS
15 MARKED AS DEFENDANT'S EXHIBIT 31 FOR
16 IDENTIFICATION.)

17 BY MR. NOWAK:

18 Q. TAKE A LOOK AT WHAT HAS BEEN MARKED TSI
19 EXHIBIT NUMBER --

20 A. 31.

21 Q. -- 31 FROM YOUR FILE, AND TELL ME IF YOU
22 RECOGNIZE THAT DOCUMENT.

23 A. YES, I DO. THIS IS A COPY OF MY
24 SPREADSHEET FOR PAYMENTS AND THE STATUS OF THE
25 ACCOUNT THROUGH APRIL -- USAGE THROUGH APRIL OF

1 1991. AND THIS IS THE ONE WHERE SOMEONE MADE A
2 CORRECTION TO MINE WHERE I HAD POSTED THE CREDIT OF
3 21,375.85 AS A CREDIT. I POSTED IT AS A PAYMENT AND
4 THEY WROTE IT IN AND MOVED IT UNDER THE CREDIT
5 COLUMN.

6 Q. AND WHY WAS THAT?

7 A. BECAUSE I HAD IT UNDER THE WRONG COLUMN,
8 AND THIS IS ONE OF THOSE BIG CREDITS.

9 Q. I SEE.

10 (THEREUPON, A DOCUMENT WAS
11 MARKED AS DEFENDANT'S EXHIBIT 32 FOR
12 IDENTIFICATION.)

13 BY MR. NOWAK:

14 Q. LET ME ASK YOU TO TAKE A LOOK AT WHAT HAS
15 BEEN MARKED TSI EXHIBIT 32, WHICH IS A TWO-PAGE
16 EXHIBIT -- I BELIEVE IT'S TWO PAGES --

17 A. YES.

18 Q. -- THAT CAME FROM YOUR FILE THAT BELONG
19 TOGETHER.

20 CAN YOU TELL ME WHAT THOSE PAGES
21 REPRESENT?

22 A. THERE WAS SOME COMMUNICATIONS FROM TSI TO
23 MYSELF REGARDING DEDUCTIONS AND TSI ACCOUNTS THAT
24 WER BEING BILLED AS ATC.

25 Q. DO YOU KNOW IF A CREDIT WAS EVER ISSUED

1 PURSUANT TO THAT MEMORANDUM, TSI NUMBER 32?

2 A. I DO NOT KNOW AND IT WOULD BE DIFFICULT
3 FOR ME TO SAY BECAUSE THIS ISN'T DATED AND I DON'T
4 KNOW WHAT TIME FRAME TO LOOK FOR IT AT.

5 Q. DO YOU RECALL IF ANY ACTION WAS TAKEN
6 REGARDING THE BILLING OF TSI CUSTOMERS BY ATC?

7 A. NO, I DO NOT RECALL.

8 (THEREUPON, A DOCUMENT WAS
9 MARKED AS DEFENDANT'S EXHIBIT 33 FOR
10 IDENTIFICATION.)

11 BY MR. NOWAK:

12 Q. PLEASE TAKE A LOOK AT TSI EXHIBIT NO. 33,
13 WHICH IS A PAGE OF HANDWRITTEN -- HALF A PAGE OF
14 HANDWRITTEN NOTES FROM YOUR FILE.

15 CAN YOU IDENTIFY THAT DOCUMENT?

16 A. IT APPEARS TO BE A LIST OF ACCOUNTS AND
17 THE CUSTOMER NAMES FROM THE MIAMI TELUS BILLING
18 SYSTEM.

19 Q. AND WHY IS THAT DOCUMENT IN YOUR FILE, DO
20 YOU KNOW?

21 A. I CAN GUESS WHY IT'S THERE.

22 Q. WHAT'S YOUR BEST GUESS?

23 A. THAT SOMEONE FROM COLLECTIONS OR CUSTOMER
24 SERVICE IDENTIFIED THESE AS TSI CUSTOMERS AND THE
25 WRITING ON THE SIDE, THE BILL COLUMN AND THE

1 ADJUSTMENT COLUMN, IS MY HANDWRITING; SO I MUST HAVE
2 DONE SOME CREDITS ON THOSE ACCOUNTS.

3 Q. DO YOU KNOW IF THOSE CREDITS ARE
4 REFLECTED ON ANY INVOICE?

5 A. TO THE BEST OF MY RECOLLECTION, SOME OF
6 THESE SITUATIONS -- THESE CREDITS WERE HANDLED BY
7 JUST WIPING OUT THE BALANCE DUE ON THE ATC BILLING
8 SYSTEM, NOT NECESSARILY GIVING THE TSI INVOICE ANY
9 CREDITS.

10 Q. SO WOULD THERE BE ANY DOCUMENTATION OF
11 THAT OTHER THAN WHAT YOU ARE HOLDING IN YOUR HAND?

12 A. I WOULD HAVE HAD TO HAVE PASSED SOME
13 INFORMATION ON TO THE CUSTOMER SERVICE DEPARTMENT TO
14 ISSUE ADJUSTMENTS OR CREDITS AGAINST ATC CUSTOMERS.
15 I DON'T RECALL IF I SAVED COPIES OF THESE AND --
16 BECAUSE OF THE TIME FRAME -- I DON'T KNOW THAT THERE
17 WOULD BE ANY OF THIS DOCUMENTATION STILL DOWN IN
18 MIAMI.

19 (THEREUPON, A DOCUMENT WAS
20 MARKED AS DEFENDANT'S EXHIBIT 34 FOR
21 IDENTIFICATION.)

22 BY MR. NOWAK:

23 Q. PLEASE TAKE A LOOK AT A DOCUMENT WHICH
24 HAS BEEN MARKED TSI EXHIBIT NUMBER 34 FROM YOUR FILE
25 WHICH IS DATED JULY 2ND, 1990.

1 A. OKAY.

2 Q. CAN YOU TELL ME IF YOU RECOGNIZE THAT
3 DOCUMENT?

4 A. YES, I DO. THIS IS A MEMO FROM MYSELF TO
5 SANDY REEF, WHO AT THE TIME WAS A CUSTOMER SERVICE
6 SUPERVISOR IN THE MIAMI SYSTEM -- IN THE MIAMI
7 OFFICE. AND I AM AUTHORIZING HER TO MAKE THE
8 FOLLOWING ADJUSTMENTS TO ATC BILLED ACCOUNTS. AND I
9 PROBABLY HAD A STICKY OR SOMETHING AT THE BOTTOM OF
10 IT THAT SAID, "DENNIS, OKAY THESE CREDITS."

11 Q. ARE THOSE DIFFERENT ACCOUNTS THAN THE
12 ONES REFLECTED ON TSI EXHIBIT 33 OR ARE THEY THE
13 SAME?

14 A. THERE'S MORE -- SOME ARE THE SAME AND
15 THERE ARE NEW ONES.

16 Q. ANY OF THE AMOUNTS THE SAME?

17 A. LET'S SEE -- THE ONE FOR MICRONET IS THE
18 SAME AMOUNT, 191.14. INGERSOLL AND RAND IS THE SAME
19 CUSTOMER BUT THE AMOUNTS DO NOT AGREE.

20 Q. DO YOU KNOW IF TSI EXHIBIT NO. 33 OR TSI
21 EXHIBIT NUMBER 34 CAME FIRST?

22 A. I HAVE NO RECOLLECTION.

23 Q. AND, AGAIN, OTHER THAN TSI EXHIBIT NUMBER
24 34, WOULD THERE BE ANY COLLATERAL DOCUMENTATION OF
25 THOSE CREDITS BEING ISSUED?

1 A. I WOULD NOT BELIEVE SO.

2 (THEREUPON, A DOCUMENT WAS
3 MARKED AS DEFENDANT'S EXHIBIT 35 FOR
4 IDENTIFICATION.)

5 BY MR. NOWAK:

6 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
7 MARKED TSI EXHIBIT 35 AND TELL ME IF YOU RECOGNIZE
8 THAT DOCUMENT.

9 A. I RECOGNIZE IT AS BEING IN MY FILE.

10 Q. DO YOU RECOGNIZE THE HANDWRITING?

11 A. THE HANDWRITING IS MINE.

12 Q. AND DO YOU RECOGNIZE THE TOPIC THAT IS
13 RECORDED ON THAT DOCUMENT, OR TOPICS?

14 A. YES, I RECOGNIZE THEM AS WHAT HAS BEEN
15 IDENTIFIED AS ISSUES BROUGHT UP BY TSI PREVIOUSLY
16 TODAY.

17 Q. WHAT WAS THE PURPOSE OF YOUR CREATING
18 THIS DOCUMENT, TSI NUMBER 35?

19 A. I HAVE NO IDEA. I HAVE NO RECOLLECTION
20 OF WHY I WROTE THESE THINGS ON THIS PIECE OF PAPER
21 AND STUCK IT IN A FILE.

22 Q. FAIR ENOUGH.

23 DO YOU KNOW APPROXIMATELY WHAT DATE THAT
24 WAS DONE?

25 A. I DON'T HAVE A CLUE. THE ANSWER IS NO.

1 Q. I'M GOING TO MARK THIS AS A COMPOSITE,
2 UNLESS SOMEBODY HAS AN OBJECTION. IT IS FOUR
3 SEPARATE ACCOUNTS CONSISTING OF EIGHT PAGES WHICH ARE
4 TOGETHER IN YOUR FILE -- I HAVEN'T MARKED THEM
5 YET -- UNLESS ANYBODY WANTS TO SUGGEST -- JUST FOR
6 PURPOSES OF SPEED HERE.

7 DO YOU MIND IF I MARK THIS AS A
8 COMPOSITE?

9 MR. SELF: NO, NO, I'M SORRY. NO
10 OBJECTION.

11 MR. NOWAK: TSI EXHIBIT NUMBER 36,
12 COMPOSITE.

13 (THEREUPON, THE DOCUMENT REFERRED TO WAS
14 MARKED AS DEFENDANT'S COMPOSITE EXHIBIT
15 36 FOR IDENTIFICATION.)

16 BY MR. NOWAK:

17 Q. WOULD YOU PLEASE TAKE A LOOK AT WHAT HAS
18 BEEN MARKED TSI EXHIBIT NUMBER 36, COMPOSITE, WHICH
19 ARE FOUR ACCOUNTS FROM YOUR FILE, AND TELL ME WHY
20 THOSE DOCUMENTS ARE IN THERE.

21 A. I HAVE NO RECOLLECTION WHY THEY ARE IN
22 HERE.

23 Q. ON THE FIRST PAGE OF THE FIRST ACCOUNT
24 THERE IS SOME HANDWRITING IN THE RIGHT-HAND MARGIN.
25 DO YOU RECOGNIZE THE HANDWRITING?

1 A. THAT'S MY HANDWRITING.

2 Q. CAN YOU TELL ME WHAT THAT'S ABOUT; WHY
3 YOU MADE THOSE NOTATIONS?

4 A. NO, I DON'T RECALL KNOW WHY I MADE THOSE
5 NOTATIONS.

6 Q. DO YOU KNOW IF THEY WERE TSI CUSTOMERS
7 BEING BILLED BY ATC?

8 A. I CAN'T ANSWER THAT FOR SURE, BUT I WOULD
9 ASSUME SO BECAUSE SOME OF THE CUSTOMERS ARE THE SAME
10 NAMES THAT ARE ON THIS OTHER PIECE OF PAPER.

11 Q. THAT BEING TSI EXHIBIT NO. 33?

12 A. CORRECT.

13 (THEREUPON, A DOCUMENT WAS
14 MARKED AS DEFENDANT'S COMPOSITE EXHIBIT
15 37 FOR IDENTIFICATION.)

16 BY MR. NOWAK:

17 Q. PLEASE TAKE A LOOK AT TSI COMPOSITE
18 EXHIBIT NUMBER 37, A LOT OF PAGES -- LET ME COUNT
19 THEM UP JUST TO BE PRECISE --

20 MR. SELF: WHAT YOU GOT?

21 MR. NOWAK: 93.

22 MR. SELF: BINGO.

23 BY MR. NOWAK:

24 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
25 MARKED TSI COMPOSITE EXHIBIT NUMBER 37 FROM YOUR FILE

1 AND TELL ME IF YOU RECOGNIZE THAT DOCUMENT AND THE
2 DATE ON THE TOP OF THE FAX COVER PAGE -- ALTHOUGH
3 THE FIRST PAGE IS OBLITERATED -- THE SECOND PAGE
4 SAYS --

5 A. APRIL 15TH, 1991.

6 Q. CAN YOU TELL ME IF YOU RECOGNIZE THAT
7 PACKAGE?

8 A. I SAW IT YESTERDAY.

9 Q. DO YOU KNOW WHAT IT'S FOR, WHAT IT
10 REPRESENTS?

11 A. IF WHAT THE TITLE PAGE SAYS IS TRUE, IT'S
12 CUSTOMERS BEING BILLED BY ATC.

13 Q. DO YOU KNOW WHY ALL THAT BACK-UP
14 DOCUMENTATION IS THERE?

15 A. NO, I DON'T RECALL.

16 Q. DO YOU KNOW WHY THE CHECK MARKS ARE MADE
17 NEXT TO CERTAIN OF THE CUSTOMERS' NAMES?

18 A. NO, I DO NOT.

19 Q. DO YOU KNOW WHAT WAS DONE WITH THIS
20 INFORMATION, WHY IT WAS COMPILED?

21 A. NO, I DON'T RECALL.

22 Q. DO YOU KNOW IF ANY CREDITS WERE ISSUED AS
23 A RESULT OF THIS ACCUMULATION OF DOCUMENTATION?

24 A. NO, I DO NOT.

25 Q. DO YOU KNOW WHO BETTY DESIMONE IS?

1 A. YES, SHE'S AN EMPLOYEE OF MINE.
2 (THEREUPON, A DOCUMENT WAS
3 MARKED AS DEFENDANT'S EXHIBIT 38 FOR
4 IDENTIFICATION.)

5 BY MR. NOWAK:

6 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
7 MARKED TSI EXHIBIT NUMBER 38 AND TELL ME WHETHER YOU
8 HAVE EVER SEEN THIS DOCUMENT, EVEN THOUGH IT IS
9 ADDRESSED TO BETTY DESIMONE?

10 A. I SAW IT YESTERDAY IN THE REVIEW OF MY
11 FILE.

12 Q. THE SECOND HALF OF THE FIRST PAGE RELATES
13 TO A COMPLAINT ABOUT TSI CUSTOMERS GETTING BILLS FROM
14 TELUS.

15 A. THAT'S CORRECT.

16 Q. DO YOU KNOW IF ANYTHING WAS DONE IN
17 RESPONSE TO THIS COMMUNICATION?

18 A. I DO NOT RECALL. YOU MEAN AT THIS TIME?

19 Q. YES.

20 A. NOVEMBER 1989?

21 Q. CORRECT.

22 A. I DO NOT RECALL.

23 (THEREUPON, A DOCUMENT WAS
24 MARKED AS DEFENDANT'S EXHIBIT 39 FOR
25 IDENTIFICATION.)

1 BY MR. NOWAK:

2 Q. COULD YOU PLEASE TAKE A LOOK AT TSI
3 EXHIBIT NUMBER 39, WHICH APPEARS TO BE A FAX COVER
4 SHEET DATED 6-25-90 ADDRESSED TO BETTY DESIMONE, AND
5 TELL ME IF YOU HAVE EVER SEEN IT.

6 A. I SAW IT YESTERDAY REVIEWING MY FILE.

7 Q. ON THE SECOND PAGE, THE LAST PART OF THE
8 LETTER REFERS TO ANOTHER COMPLAINT ABOUT TSI
9 CUSTOMERS BEING BILLED BY ATC.

10 DO YOU KNOW IF ANY ACTION WAS TAKEN AS A
11 RESULT OF THIS COMMUNICATION?

12 A. I DO NOT KNOW IF ANYTHING WAS DONE ON
13 THESE.

14 (THEREUPON, A DOCUMENT WAS
15 MARKED AS DEFENDANT'S EXHIBIT 40 FOR
16 IDENTIFICATION.)

17 BY MR. NOWAK:

18 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
19 MARKED TSI EXHIBIT NUMBER 40 AND TELL ME IF YOU HAVE
20 EVER SEEN THAT DOCUMENT.

21 A. I REVIEWED IT YESTERDAY FROM MY FILES.

22 Q. AND THE ATTACHMENT TO THAT DOCUMENT
23 APPEARS TO BE DOCUMENTS WHICH WERE PREVIOUSLY MARKED
24 AS TSI EXHIBIT NO. 32?

25 A. YES, IT'S THE SAME.

1 Q. AND THE FIRST SENTENCE OF THIS MEMORANDUM
2 SAYS, "WE HAVE DISCUSSED NUMEROUS TIMES THE PROLEM
3 WITH MY ACCOUNTS BEING BILLED BY ATC ERRONEOUSLY."

4 DO YOU RECALL TAKING ANY ACTION AS A
5 RESULT OF THIS COMMUNICATION?

6 A. I DO NOT RECALL.

7 Q. ON THE ACCOMPANYING PAGES, THE
8 ATTACHMENT, THERE IS A REFLECTION OF DEDUCTIONS
9 TOTTALLING \$150,114.99, DO YOU SEE THAT?

10 A. YES, I DO.

11 Q. DO YOU KNOW IF THAT WAS EVER ISSUED AS A
12 CREDIT? THAT AMOUNT, I MEAN.

13 A. I DO NOT KNOW FOR SURE BECAUSE THIS IS A
14 SITUATION WHERE PART OF THE ADJUSTMENT COULD HAVE
15 BEEN DONE ON THE ATC BILLING SIDE OF IT.

16 Q. THE LAST FULL PARAGRAPH ON THE FIRST PAGE
17 OF TSI EXHIBIT NUMBER 40 DISCUSSES A DIFFERENCE
18 BETWEEN BILLING AT SIX-SECOND INCREMENTS AND ANOTHER
19 INCREMENTAL BASIS, ONE-MINUTE INCREMENTS.

20 DO YOU RECALL DISCUSSING THAT TOPIC WITH
21 JOEL ESQUENAZI?

22 A. I DO NOT RECALL DISCUSSING THAT.

23 Q. DO YOU RECALL TAKING ANY ACTION AS A
24 RESULT OF THIS MEMORANDUM --

25 A. NO, I DON'T.

1 Q. -- REGARDING THAT TOPIC?

2 A. NO, I DO NOT RECALL.

3 (THEREUPON, A DOCUMENT WAS
4 MARKED AS DEFENDANT'S EXHIBIT 41 FOR
5 IDENTIFICATION.)

6 BY MR. NOWAK:

7 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
8 MARKED TSI EXHIBIT 41 AND TELL ME IF YOU RECOGNIZE
9 THAT DOCUMENT.

10 A. I SAW IT IN MY FILE YESTERDAY.

11 Q. IT, APPARENTLY, ALSO DISCUSSES THE --
12 CONCERNS THE TOPIC OF TSI CUSTOMERS BEING BILLED BY
13 ATC.

14 DO YOU RECALL TAKING ANY ACTION AS A
15 RESULT OF THIS COMMUNICATION?

16 A. NO, I DO NOT RECALL.

17 (THEREUPON, A DOCUMENT WAS
18 MARKED AS DEFENDANT'S EXHIBIT 42 FOR
19 IDENTIFICATION.)

20 BY MR. NOWAK:

21 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
22 MARKED TSI EXHIBIT 42, A LETTER DATED JULY 19, 1991
23 ADDRESSED TO YOU, AND LET ME ASK YOU IF YOU RECOGNIZE
24 THAT DOCUMENT.

25 A. I BELIEVE I SAW IT YESTERDAY IN THE

1 REVIEW OF MY FILE.

2 Q. THE SECOND PARAGRAPH IN THE LETTER
3 SAYS, "THE FIRST ITEM IS ONE WE HAVE DISCUSSED ON
4 PRIOR OCCASIONS BUT CONTINUES TO OCCUR. THIS REGARDS
5 TSI CUSTOMERS CONTINUING TO RECIVE BILLS, CALLING
6 CARDS, ADVERTISING, OTHER CORRESPONDENCE FROM ATC."

7 DO YOU RECALL DISCUSSING THIS TOPIC WITH
8 JOEL ESQUENAZI AT THIS TIME?

9 A. AT THE TIME OF THIS LETTER, NO, I DO NOT
10 REMEMBER THIS.

11 Q. THE THIRD PARAGRAPH DOWN REFERS
12 TO "TRANSFERRING OF A&I'S OF NEWLY ACQUIRED ATC
13 CUSTOMERS VIA MAGNETIC TAPE."

14 DO YOU RECALL THAT EVENT?

15 A. NO, I DO NOT.

16 Q. DO YOU RECALL ANYTHING ABOUT ANY OF THE
17 TOPICS WHICH ARE DISCUSSED IN THIS LETTER?

18 A. WELL, THEY ARE OLD, RECURRING PROBLEMS.
19 YOU KNOW, TSI CUSTOMERS BEING BILLED FROM ATC
20 WOULD -- IF THEY WERE BEING BILLED FROM ATC, THEY
21 WOULD BE RECEIVING BILLS, CALLING CARDS,
22 ADVERTISEMENTS AND SO ON -- AND THE NEXT PARAGRAPH
23 YOU REFER TO IS SAYING THAT THERE IS A DELAY IN
24 CHANGING THE PICS ON THESE A&I'S ON A TIMELY BASIS.
25 I DO NOT RECALL AT THIS TIME WHAT WOULD HAVE PROMPTED

1 THIS.

2 (THEREUPON, A DOCUMENT WAS
3 MARKED AS DEFENDANT'S EXHIBIT 43 FOR
4 IDENTIFICATION.)

5 BY MR. NOWAK:

6 Q. PLEASE TAKE A LOOK AT WHAT HAS BEEN
7 MARKED TSI EXHIBIT NUMBER 43 AND TELL ME IF YOU
8 RECOGNIZE THAT DOCUMENT CONSISTING OF A FAX COVER
9 SHEET, DATED AUGUST 23RD, 1991, AND ACCOMPANYING
10 HANDWRITTEN LETTER TO BETTY DESIMONE ALSO DATED
11 AUGUST 23RD, 1991, AND TELL ME IF YOU RECOGNIZE IT.

12 A. I SAW IT YESTERDAY.

13 Q. THE HANDWRITTEN LETTER REFERS TO PROBLEMS
14 OF TSI ACCOUNTS GETTING BILLED BY ATC.

15 A. THAT'S CORRECT.

16 Q. DO YOU KNOW IF ANY ACTION WAS TAKEN IN
17 RESPONSE TO THIS COMMUNICATION?

18 A. I DON'T RECALL.

19 Q. AM I CORRECT IN ASSUMING WHAT YOU HAVE
20 TOLD ME SO FAR THAT YOU WOULD NOT HAVE ANY KNOWLEDGE
21 ABOUT THE EVENTS LEADING UP TO THE SUSPENSION OF
22 SERVICE BY ATC TO TSI AND THE EVENTS THAT HAPPENED
23 IMMEDIATELY THEREAFTER?

24 MR. MESSER: OBJECT TO THE QUESTION.
25 THERE IS NO DATE TIME FRAME AROUND IT AND,

1 NUMBER TWO, IT PRESUPPOSES THE FACT.

2 BY MR. NOWAK:

3 Q. DO YOU HAVE ANY KNOWLEDGE CONCERNING THE
4 TERMINATION OF ATC TO TSI?

5 A. IS YOUR QUESTION DID I KNOW WHAT
6 HAPPENED? OR DID I HAVE ANYTHING TO DO WITH IT?

7 Q. DO YOU HAVE ANY PERSONAL KNOWLEDGE
8 CONCERNING THAT EVENT?

9 A. I KNOW IT OCCURRED.

10 Q. BASED UPON --

11 A. OFFICE TALK.

12 Q. NO PERSONAL INVOLVEMENT THEN AT ALL?

13 A. NOT IN THE CONTEXT OF SERVICE, NO, SIR.

14 Q. OR THE EVENTS LEADING UP TO IT?

15 A. NO, SIR.

16 Q. OR THE EVENTS FOLLOWING IT?

17 A. I DON'T RECALL ANY.

18 Q. DO YOU HAVE ANY KNOWLEDGE CONCERNING THE
19 SOLICITATION OF FORMER TSI CUSTOMERS BY ATC AFTER THE
20 TERMINATION OF SERVICE BY ATC TO TSI?

21 MR. MESSER: AGAIN, WE OBJECT TO THE
22 QUESTION ON THE GROUNDS THAT IT ASSUMES A FACT
23 WHICH IS NOT IN EVIDENCE.

24 MR. NOWAK: OKAY.

25 BY MR. NOWAK:

1 Q. DO YOU HAVE ANY KNOWLEDGE OF SUCH A THING
2 OCCURRING?

3 A. I RECALL BEING ASKED BY A VICE-PRESIDENT
4 OF THE COMPANY FOR 800 RECORDS.

5 Q. RECORDS OF 800 NUMBERS?

6 A. TSI CUSTOMERS THAT HAD 800 NUMBERS.

7 Q. DO YOU KNOW WHY THAT REQUEST WAS MADE?

8 A. I DO NOT RECALL THE REASON FOR IT.

9 Q. DO YOU RECALL WHEN IT OCCURRED?

10 A. I COULDN'T GIVE YOU A DATE, NO.

11 Q. CAN YOU GIVE ME A BALLPARK?

12 A. IT WAS AFTER THE TIME WHICH I HAD HEARD
13 THAT THE SERVICE HAD BEEN TERMINATED.

14 Q. DO YOU KNOW WHAT WAS DONE WITH THAT
15 INFORMATION?

16 A. ONLY OFFICE TALK.

17 Q. WHAT WAS THE OFFICE TALK?

18 MR. MESSER: AGAIN, WE OBJECT ON THE
19 GROUNDS YOU ARE CALLING FOR HEARSAY.

20 THE WITNESS: OFFICE TALK WAS THAT
21 CUSTOMERS -- I DON'T REMEMBER THIS PART OF
22 IT -- GIST OF IT WAS THAT CUSTOMERS WHO HAD
23 800 SERVICE WERE NOW OUT OF SERVICE AND WE
24 WERE TRYING TO ASSIST THESE CUSTOMERS IN
25 KEEPING THEIR 800 NUMBERS AND THEIR 800

1 SERVICE WORKING.

2 BY MR. NOWAK:

3 Q. AS ATC CUSTOMERS?

4 A. AS ATC CUSTOMERS.

5 Q. DO YOU RECALL WHO PARTICIPATED IN THOSE
6 CONVERSATIONS?

7 A. RUDY MCGLASHIN, M-C-G-L-A-S-H-I-N, AND
8 CLARE REYNARDUS, FROM THE CARRIER SALES DIVISION.

9 Q. ANYBODY ELSE THAT YOU CAN THINK OF?

10 A. THOSE ARE THE ONLY TWO PEOPLE I CAN
11 RECALL.

12 Q. ARE THOSE TWO INDIVIDUALS STILL EMPLOYED
13 AT ATC, WHICH IS NOW LDDS?

14 A. CLARE HAS A NEW NAME BUT STILL EMPLOYED,
15 YES.

16 Q. WHAT'S HER NEW NAME?

17 A. CLARA THOMPSON.

18 Q. WAS THE 800 SERVICE SOMETHING WITHIN
19 CLARA REYNARDUS' RESPONSIBILITY?

20 A. SHE WAS NOW PART OF THE DEPARTMENT THAT
21 WAS SERVICING THE ACCOUNT.

22 Q. SERVICING --

23 A. THE TSI ACCOUNT. THAT'S THE -- SHE
24 WORKED FOR THE DEPARTMENT I PASSED SERVICING OF THE
25 ACCOUNT OVER TO.

1 Q. SO THIS WOULD BE SOMETHING THAT SHE WOULD
2 BE INVOLVED IN?

3 A. YES, SIR.

4 Q. DO YOU HAVE ANY KNOWLEDGE OF ANY OTHER
5 CLAIMS THAT HAVE EVER BEEN ASSERTED AGAINST
6 TRANSCALL, AMERICA, INC. OR ATC REGARDING OVER
7 BILLING, DOUBLE BILLING, DUPLICATE BILLING, THINGS OF
8 THAT NATURE?

9 MR. MESSER: WE'LL OBJECT AS TO THE
10 RELEVANCY.

11 THE WITNESS: STILL HAVE TO ANSWER IT,
12 RIGHT?

13 MR. MESSER: YES, YOU HAVE TO ANSWER IT.

14 THE WITNESS: THERE WAS RECENTLY THE PSC
15 RULING AGAINST ATC, AND I'VE JUST GONE BLANK
16 AS TO WHAT THAT WAS, BUT IT HAD SOMETHING TO
17 DO WITH INCOMPLETE CALLS

18 BY MR. NOWAK:

19 Q. OTHER THAN THE FLORIDA PUBLIC SERVICE
20 COMMISSION RULING, ANY OTHER CLAIMS THAT YOU ARE
21 AWARE OF?

22 A. NO.

23 Q. DO YOU KNOW WHAT THE CLAIMS OF TRANSCALL
24 AMERICA, INC. OR ATC ARE AGAINST TSI IN THIS CASE?

25 A. NO, I DO NOT.

1 Q. DO YOU KNOW WHAT THE CLAIMS ASSERTED BY
2 TSI AGAINST TRANSCALL AMERICA AND ATC ARE IN THIS
3 CASE?

4 A. NO, I DO NOT.

5 Q. DO YOU KNOW IF ANY OF THE TSI CUSTOMERS
6 BECAME ATC CUSTOMERS AFTER TERMINATION OF SERVICE TO
7 TSI BY ATC?

8 A. I DON'T KNOW THE ANSWER TO THAT.

9 MR. NOWAK: CAN I HAVE FIVE MINUTES?

10 MR. MESSER: SURE. WE'LL GIVE YOU EVERY
11 BIT OF THAT. ARE YOU THROUGH, YOU THINK?

12 MR. NOWAK: I THINK SO.

13 (THEREUPON, A SHORT RECESS WAS OBSERVED
14 BY ALL PARTIES PRESENT.)

15 MR. NOWAK: I ONLY HAVE TWO MORE
16 QUESTIONS.

17 MR. SELF: GO AHEAD.

18 BY MR. NOWAK:

19 Q. ARE YOU AWARE OF THE EXISTENCE OF ANY
20 OTHER RECORDS RELATING TO THE BUSINESS RELATIONSHIP
21 BETWEEN TSI AND EITHER ATC TELUS OR TRANSCALL OTHER
22 THAN THE ONES YOU BROUGHT WITH YOU TODAY?

23 A. THESE ARE MY ONLY RECORDS AND MY
24 INVOLVEMENT WITH TSI.

25 Q. ARE YOU AWARE OF THE EXISTENCE OF ANY

1 OTHER RECORDS?

2 A. I SAW SOME RECORDS YESTERDAY FROM OTHER
3 PEOPLE THAT FLOYD SELF HAD.

4 MR. MESSER: LET THE RECORD SHOW THAT WE
5 HAVE ALREADY ADVISED YOU THAT WE HAVE OTHER
6 FILES --

7 MR. NOWAK: OKAY.

8 MR. MESSER: -- FROM OTHER PEOPLE THAT
9 YOU HAVE TOLD US YOU WISH TO DEPOSE. AND WE
10 WILL HAVE THOSE AVAILABLE EITHER IN ADVANCE OR
11 WHEN THOSE PERSONS ARE AVAILABLE TO IDENTIFY
12 THEM.

13 MR. NOWAK: OKAY.

14 BY MR. NOWAK:

15 Q. DO YOU RECALL WHETHER ANY OF THE RECORDS
16 THAT YOU REVIEWED IN PREPARATION FOR YOUR DEPOSITION
17 TODAY HAD ANY IMPACT ON YOUR RECOLLECTION OF ANY OF
18 THE EVENTS?

19 A. I DON'T UNDERSTAND YOUR QUESTION.

20 Q. OTHER THAN THE RECORDS THAT WE HAVE
21 DISCUSSED TODAY FROM YOUR FILE, YOU SAW OTHER RECORDS
22 YESTERDAY --

23 A. UH-HUH.

24 Q. MY QUESTION IS: DO YOU RECALL ANY OF
25 THOSE OTHER RECORDS IMPACTING YOUR MEMORY REGARDING

1 THE EVENTS RELATING TO THE BUSINESS RELATIONSHIP
2 BETWEEN TSI AND ATC?

3 A. THE ONLY RECORDS I SAW YESTERDAY WERE THE
4 BILLS PREPARED BY THE FINANCE DEPARTMENT THAT KIND OF
5 SAID, OH, I MUST HAVE STOPPED DOING MY BILLING THIS
6 DAY AND THEY PICKED IT UP ON THIS DAY.

7 Q. DID YOU HAVE ANY OTHER CONVERSATIONS WITH
8 ANY OTHER ATC OR LDDS EMPLOYEES CONCERNING THE TSI
9 ACCOUNT OTHER THAN THE ONES THAT YOU HAVE ALREADY
10 TESTIFIED ABOUT?

11 A. YESTERDAY, YOU MEAN?

12 Q. NO, I MEAN --

13 A. OH.

14 Q. -- AT ALL. THAT YOU REMEMBER.

15 A. THE ONLY PEOPLE THAT I WOULD HAVE ANY
16 DISCUSSION ON THIS WOULD HAVE BEEN BETTY DESIMONE,
17 WHO WORKED FOR ME, AND CLARE REYNARDUS-THOMPSON AND
18 RUDY MCGLASHIN AND -- BACK THEN -- THAT'S ABOUT AS
19 MUCH AS I CAN RECALL.

20 Q. HOW ABOUT AFTER THE TERMINATION OF
21 SERVICE TO TSI?

22 A. I CAN'T THINK OF ANYBODY DIFFERENTLY.

23 Q. ANY OTHER CONVERSATIONS THAT YOU RECALL?

24 A. NO.

25 MR. NOWAK: THANK YOU VERY MUCH FOR

1 COMING AND THAT'S ALL I HAVE.

2 MR. MESSER: I HAVE A FEW QUESTIONS.

3 CROSS-EXAMINATION

4 BY MR. MESSER:

5 Q. DURING THE COURSE OF THIS DEPOSITION YOU
6 HAVE BEEN SHOWN A NUMBER OF MEMORANDA WHICH PURPORTS
7 TO HAVE INFORMATION REGARDING ATC'S BILLING OF TSI
8 CUSTOMERS.

9 DO YOU ACKNOWLEDGE THAT?

10 A. YES, I DO.

11 Q. NOW, DID YOU, UPON RECEIPT OF ANY OF THE
12 COMMUNICATIONS FROM TSI, PASS THIS INFORMATION ON TO
13 OTHER EMPLOYEES AT ATC?

14 A. I RECALL PASSING INFORMATION TO THE IS
15 DEPARTMENT CONCERNING THE PROBLEM WITH ATC BILLING
16 THE CUSTOMERS THAT SHOULD HAVE BEEN TSI'S.

17 Q. NOW, YOU DESCRIBED A SITUATION DELINEATED
18 OR CHARACTERIZED AS A COMPUTER FIX. BEFORE YOU
19 DESCRIBE THAT FIX FOR ME AGAIN, I WOULD LIKE FOR YOU
20 TO EXPLAIN HOW A TSI CUSTOMER COULD GET INTO AN ATC
21 ACCOUNT. IF YOU KNOW.

22 A. TO THE BEST OF MY RECOLLECTION, IT COULD
23 HAPPEN ONE OF TWO WAYS. AS I PREVIOUSLY DESCRIBED ON
24 THE RESPONDENT PROCESS BACK FROM THE TELCO --

25 Q. LET'S STOP RIGHT THERE. THE TELCO IS THE

1 LOCAL TELEPHONE COMPANY?

2 A. THAT'S CORRECT.

3 Q. OKAY.

4 A. ON THEIR RESPONDENT BACK FROM A PIC
5 CHANGE REQUEST, IF THE COMPUTER DID NOT FIND A MATCH
6 FOR THAT A&I THAT WAS BEING SENT, A NEW ACCOUNT COULD
7 BE SET UP FOR THAT INFORMATION.

8 AND THE SECOND REASON THAT A TSI CUSTOMER
9 COULD BE BILLED FOR TELUS IS THAT THERE ARE NO
10 DISCONNECTION -- THE A&I'S ON A CUSTOMER'S ACCOUNT
11 ARE NEVER REMOVED FROM A BILLING SYSTEM EVEN AFTER
12 THE CUSTOMER STOPS USING US OR IS CANCELED.

13 AND, SO, A RESPONDENT PROCESS FROM THE
14 TELCO THAT SAID THAT THEY WANT PIC 031 ON A CERTAIN
15 TELEPHONE NUMBER WOULD FIND A MATCH FROM AN OLD
16 TELUS-ATC CUSTOMER.

17 Q. NOW, JUST TO BE BLUNT ABOUT IT, DO YOU
18 KNOW OF ANY OCCASION IN WHICH ATC OR TELUS
19 DELIBERATELY ATTEMPTED TO STEAL A CUSTOMER FROM TSI
20 AND PUT IT ON ITS OWN NETWORK?

21 A. ABSOLUTELY NOT.

22 Q. WHEN THESE MATTERS WERE CALLED TO YOUR
23 ATTENTION AND YOU PASSED THE INFORMATION ON TO IS,
24 WHICH I PRESUME IS INFORMATION SERVICES --

25 A. YES, SIR.

1 Q. -- ARE YOU AWARE OF ANY COMPANY EFFORTS
2 TO SOLVE THE PROBLEM; THAT IS, TSI CUSTOMERS BEING
3 BILLED BY TELUS OR ATC DIRECT?

4 A. YES, BECAUSE OF THE FIXES THAT WERE PUT
5 INTO PLACE WHERE THE COMPUTER CROSS-CHECKED A&I'S TO
6 MAKE SURE THEY WEREN'T IN THE OPPOSITE SIDE OF THE
7 BILLING SYSTEM --

8 Q. LET ME STOP YOU RIGHT THERE. YOU KEEP
9 TALKING ABOUT THE OPPOSITE SIDE OF THE BILLING
10 SYSTEM.

11 WOULD YOU EXPLAIN WHAT YOU MEAN BY THE
12 TWO SIDES OF THE BILLING SYSTEM?

13 A. OKAY. NORMAL ATC-TELUS CUSTOMERS WERE
14 PUT ON THE MAIN BILLING SYSTEM WHERE THE ACCOUNTS
15 WERE SET UP FOR BILLING AND EVERYTHING WAS DONE TO
16 SERVICE THE ACCOUNT AND ATC SENT OUT THE BILLS. FOR
17 THE TWO RESELLERS, TSI AND THE OTHER COMPANY THAT WAS
18 SERVICED, WHERE WE WERE PRODUCING THE INVOICES FOR
19 THOSE CUSTOMERS TO BILL, THEY WERE ON A SEPARATE --
20 IN A SEPARATE SUBDIVISION OF THE COMPUTER.

21 Q. SO WHEN YOU MEAN THE OTHER SIDE OF THE
22 COMPUTER, ARE YOU REFERRING TO THE TSI --

23 A. YES.

24 Q. -- DATA BANK?

25 A. YES, SIR.

1 Q. NOW, DID YOU COMPLETE YOUR ANSWER?

2 A. I BELIEVE THAT ACTION WAS TAKEN FROM THE
3 IS DEPARTMENT BECAUSE OF THE TWO FIXES THAT WERE PUT
4 INTO PLACE WHICH WE CROSS-REFERENCED THE A&I'S AND
5 THE FACT THAT TRAFFIC WAS PULLED FOR THE TWO
6 RESELLERS PRIOR TO IT BEING BUMPED UP AGAINST THE
7 MAIN TELUS COMPUTER BASE.

8 Q. SO IF I UNDERSTAND IT CORRECTLY, AT SOME
9 POINT IN TIME THE POLICY OF ATC TELUS WAS TO GIVE
10 PRIORITY TO TSI IN TERMS OF PULLING INFORMATION OUT
11 OF THE COMPUTER SO THAT ITS CUSTOMER BASE WOULD
12 REMAIN INTACT? IS THAT WHAT YOU ARE SAYING?

13 A. YES, SIR.

14 Q. LET ME ASK YOU ONE MORE QUESTION. I
15 BELIEVE IT'S ONLY ONE MORE -- NO -- PROBABLY TWO
16 MORE.

17 YOU HAD SOME DISPUTES FROM TIME TO TIME
18 WITH TSI AS TO THE BALANCE YOU DEEMED WAS DUE YOUR
19 COMPANY?

20 A. CORRECT.

21 Q. IS THAT CORRECT?

22 A. THAT'S CORRECT.

23 Q. DID YOU EVER REACH A POINT IN TIME IN
24 WHICH, TO YOUR OWN PERSONAL KNOWLEDGE, YOU REACHED AN
25 AGREEMENT WITH MR. ESQUENAZI AND TSI AS TO AN AMOUNT

1 DUE FROM TSI TO ATC?

2 A. ABSOLUTELY.

3 Q. NOW, CAN YOU TELL ME WHEN THAT WAS AND
4 SHOW ME WHAT DOCUMENT THE NUMBER IS REFLECTED UPON.

5 LET ME CALL YOUR ATTENTION TO THE EXHIBIT
6 31 FOR IDENTIFICATION, IF YOU CAN FIND IT.

7 A. OKAY.

8 Q. HAVE YOU FOUND IT?

9 A. YES.

10 TO THE BEST OF MY RECOLLECTION, EXHIBIT
11 NUMBER 23 WOULD BE THE -- WHAT MAKES ME FEEL SO
12 COMFORTABLE THAT WE CAME TO AN AGREEMENT ON THE
13 AMOUNT DUE, BECAUSE THIS IS WHAT I HAD AS MY PAYMENT
14 SCHEDULE FOR PAYMENT ARRANGEMENTS FOR THE BALANCE OF
15 154,432.65.

16 Q. WAS THE PAYMENT SCHEDULE ACTUALLY
17 IMPLEMENTED DURING THE TIME THAT YOU REMAINED IN
18 CHARGE OF THE ACCOUNT?

19 A. YES, SIR.

20 Q. AND CAN YOU TELL ME THE HISTORY OF THAT
21 ACCOUNT FROM THE TIME YOU REACHED AN AGREEMENT AND
22 THE PAYMENT ARRANGEMENTS WERE MADE UNTIL YOU TURNED
23 THE ACCOUNT OVER?

24 A. PAYMENT ARRANGEMENTS HAD BEEN KEPT, AND
25 AT THE TIME I TURNED OVER THE ACCOUNT TO THE CARRIER

1 SALES DIVISION, MY RECORDS INDICATED THAT THE AMOUNT
2 DUE WAS \$93,055.14.

3 Q. AND TO YOUR KNOWLEDGE, DID ANYONE AT TSI
4 DISPUTE THAT FACT?

5 A. NO, SIR. TO MY RECOLLECTION, JOEL AND I
6 AGREED ON THE 154 AMOUNT AND IT WORKED ITS WAY DOWN
7 TO THIS AND THERE WERE NO OTHER ISSUES THAT I
8 RECALL.

9 Q. AND, AGAIN, THE BALANCE OF THE ACCOUNT
10 WHEN IT WAS TURNED OVER TO OTHER PERSONS?

11 A. \$93,055.14.

12 Q. AND CAN YOU TELL ME THE PERSON OR PERSONS
13 TO WHOM YOU TURNED THE ACCOUNT OVER?

14 A. THE CARRIER SALES DIVISION OF ATC. I
15 REMEMBER THE VICE-PRESIDENT'S NAME WAS JOE AMMERSLEY,
16 AND I DON'T RECALL IF CLARA REYNARDUS WAS IN HER
17 POSITION AT THAT TIME OR IF IT WAS A WOMAN NAMED
18 MAGGIE TUMOR.

19 MR. MESSER: AND WE HAVE NO FURTHER
20 QUESTIONS.

21 MR. NOWAK: I HAVE A COUPLE OF
22 FOLLOW-UP.

23 REDIRECT EXAMINATION

24 BY MR. NOWAK:

25 Q. AGAIN, YOU HAVE NO PERSONAL KNOWLEDGE

1 REGARDING THE COMPUTER FIX OF THE ATC BILLING SYSTEM
2 TO CORRECT THE PROBLEM WHICH RESULTED IN THE DIRECT
3 BILLING OF TSI CUSTOMERS, CORRECT?

4 A. THAT'S CORRECT.

5 Q. YOU DIDN'T WORK IN THAT DIVISION?

6 A. NO, SIR.

7 Q. YOU WERE NOT AN EMPLOYEE IN THAT PART OF
8 THE COMPANY?

9 A. NO, SIR.

10 Q. YOU HAD NO PERSONAL INVOLVEMENT IN THE
11 COMPUTER FIX?

12 A. NO, SIR.

13 Q. THIS WAS JUST INFORMATION YOU WERE TOLD
14 BY OTHER PEOPLE?

15 A. YES, SIR.

16 Q. AND YOU, IN FACT, HAVE NO PERSONAL --

17 A. WELL, I KNOW IT HAPPENED BECAUSE WHEN YOU
18 TRY TO PUT AN A&I IN ON ONE SIDE OF THE HOUSE, IF IT
19 EXISTED ON THE OTHER WE WOULD GET AN ERROR MESSAGE.
20 SO I KNOW SOMETHING EXISTED.

21 Q. BUT YOU HAD TO KNOW SOMETHING WAS PUT
22 IT?

23 A. CORRECT.

24 Q. BUT YOU HAVE NO PERSONAL KNOWLEDGE
25 WHETHER THAT ACTUALLY CORRECTED THE PROBLEM?

1 A. NO, SIR.

2 Q. AND THIS WASN'T, IN FACT, AN EFFORT TO
3 GIVE PRIORITY TO TSI CUSTOMERS, IT WAS AN EFFORT TO
4 CORRECT THE ATC BILLING SYSTEM WHICH RESULTED IN ATC
5 DIRECT BILLING TSI CUSTOMERS?

6 A. CORRECT.

7 MR. NOWAK: THAT'S IT.

8 MR. MESSER: THAT'S FINE.

9 (THEREUPON, THE DEPOSITION CONCLUDED
10 AT 4:05 P.M., AND EXHIBITS WERE RETAINED
11 BY COUNSEL.)
12

13

DEPONENT

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____

15 DAY OF _____, 19____.

16 MY COMMISSION EXPIRES: _____
17
18
19
20
21
22
23
24
25

EXHIBIT _____
(MJD - 1)

EXHIBIT _____
(MJD - 1)

17

IN THE CIRCUIT COURT OF THE
ELEVENTH JUDICIAL CIRCUIT IN
AND FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 92-11654 CA 11

TRANSCALL AMERICA, INC., a
Georgia corporation d/b/a ATC,

Plaintiff/Counter Defendant,

v.

TELECOMMUNICATION SERVICES, INC.,
a Florida corporation,

Defendant/Counter Plaintiff/
Third Party Plaintiff,

EXHIBIT

TSL + 1 8/24/94
LWJ/MG

TELECOMMUNICATION SERVICES, INC.,
a Florida corporation,

Counter Plaintiff/Third Party
Plaintiff,

v.

TRANSCALL AMERICA, INC., a
Georgia corporation and ADVANCED
TELECOMMUNICATIONS CORP., a
Delaware corporation,

CounterDefendant/Third Party
Defendant.

RE-NOTICE OF TAKING DEPOSITION

TO: A. EDWARD QUINTON, III, ESQUIRE, Adams, Quinton & Fuller, P.A., 186 S.W. 13
Street (Coral Way), Miami, Florida 33130 and ELLIOT MESSER, ESQUIRE, 215
S. Monroe Street, Suite 701, Tallahassee, Florida 32302-1876

PLEASE TAKE NOTICE that the undersigned attorneys will take the
deposition(s) of:

Name and Address: Transcall America, Inc. by and
through person or persons having
the most knowledge concerning those
matters stated in the attached addendum
to Notice Duces Tecum for Deposition

Date and Time : August 23, 1994 at 9:30 a.m.
Location : Kirkpatrick & Lockhart
Miami Center - Suite 2000
201 South Biscayne Blvd.
Miami, Florida 33131

upon oral examination before a court reporter, Notary Public, or any other officer authorized by law to take depositions. The oral examinations will continue from day to day until completed. The depositions are being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Florida Rules of Civil Procedure.

The deponent is to bring with him/her at said time and place those documents listed in the attached Addendum to Notice Duces Tecum for Deposition.

I HEREBY CERTIFY that a true and correct copy of the foregoing document was mailed this 13th day of August, 1994 to the above-named addressees.

KIRKPATRICK & LOCKHART
Attorneys for Defendant
Miami Center - Suite 2000
201 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 539-3300

By: 
Dennis A. Nowak
Florida Bar No. 328979

cc: Worldwide Reporting Service

**ADDENDUM TO
NOTICE DUCES TECUM FOR DEPOSITION**

1. The document retention and/or destruction policies of Transcall America, Inc., its predecessors and successors ("Transcall") and any documents reflecting that policy.
2. Transcall's business relationship with Telecommunication Services, Inc. ("TSI") and any documents evidencing the terms and conditions thereof.
3. Transcall's policies, practices and procedures relating to Transcall's rendering of billing and/or billing summaries or reports to TSI for:
 - a. amounts allegedly owed by TSI to Transcall;
 - b. amounts allegedly owed by end use customers to TSI; and/or
 - c. any documents evidencing those policies, practices and procedures.
4. Transcall's rendering of bills directly to end use customers serviced by TSI for amounts allegedly owed directly to Transcall and copies of any such bills.
5. The terms and conditions of the contractual and/or other business relationships between Transcall and TSI and any documents evidencing the terms and conditions thereof.
6. Communications between Transcall and TSI regarding:
 - a. Transcall's bill to TSI;
 - b. Transcall's preparation of billing and/or billing summaries or reports for TSI's use in billing end use customers;
 - c. Transcall's rendering of billing directly to end use customers serviced by TSI; and/or
 - d. copies of any such written communications.
7. Any claims asserted against Transcall, other than by TSI, alleging a practice, policy or procedure of overbilling, duplicate billing, false billing and/or any other conduct by Transcall which is substantially similar to the claims asserted by TSI against Transcall in the Counterclaims in this case and copies of any documents asserting such claims.
8. The claims asserted by Transcall against TSI in this case.
9. The claims asserted by TSI against Transcall in this case.
10. Transcall's termination of its contract and/or other business relationships with TSI and any documents relating thereto.
11. The continuation of service by Transcall to end use customers formerly service by TSI after Transcall's termination of its contract with TSI and

any documents evidencing such continuation of service.

12. Transcall's defenses to claims asserted by TSI in its Counterclaims.

EXHIBIT _____
(MJD - 2)

EXHIBIT

TSI #2 8/24/94
MG

TELECOMMUNICATIONS, INC. / 1020 N.W. 163rd DR. / MIAMI, FL 33169 / FOR BILLING INQUIRIES: (305) 624-0164
 1/24/84 REG 113 TYPE 270 CUST# (5285 INVO 5827 CYCLE 1 PAGE 4 OF 45

NO. 1) 305-358-7748

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
0/23	8:45 AM	MIAMI	(011)449-9024	UNTD KNCBN	2.0	2.22		
0/23	12:51 PM	MIAMI	(011)449-9024	UNTD KNCBN	5.0	4.71		
0/24	10:41 AM	MIAMI	(011)441-8707	LONDON. UK	2.0 ^v	2.22		-
0/24	10:42 AM	MIAMI	(011)441-8488	LONDON. UK	7.0 ⁵⁹	6.37		-
0/24	10:53 AM	MIAMI	(011)449-9024	UNTD KNCBN	2.0	2.22		
0/24	1:12 PM	MIAMI	(011)442-7679	UNTD KNCBN	1.0	1.04		
0/24	3:06 PM	MIAMI	(011)449-9024	UNTD KNCBN	3.0	2.30		
TOTALS FOR AREA CODE			011	(0 CALLS	7)	22.0	21.08	
305-358-7748				(0 CALLS	7)	22.0	21.08	

EXHIBIT _____
(MJD - 3)

EXHIBIT

BI #3 8/24/94 MG

PLEASE ENTER THE AMOUNT REMITTED AND	*****	*****
THE BALANCE WITH YOUR PAYMENT	+	+ 49.39 +
	*****	*****

221 COUNSELLING
 CONTACT: DR. SAPEK
 7842 S.W. 43 RD AVE. STE. 311
 SOUTH MIAMI, FL 33143

ATC
 P.O. BOX 673947
 MIAMI, FL 33267-0947

11782103001 887673737201 11038937

FOR RESIDENTIAL CUSTOMERS CALL 624-2164 OR 1-800-333-2164
 COMMERCIAL CUSTOMERS CALL 624-5549 OR 1-800-333-2164

BEGINNING NEXT MONTH, YOU'LL NOTICE A NEW LOOK IN YOUR
 ATC BILL. WE'VE COMPLETED A MAJOR UPGRADE OF OUR BILLING SYSTEM
 AND WE HOPE YOU'LL FIND YOUR NEW INVOICE SIMPLER, MORE USEFUL AND
 EASIER TO READ. LOOK FOR DETAILS WITH NEXT MONTH'S BILL!

OUR RECORDS INDICATE YOUR ACCOUNT IS DELINQUENT.
 TO AVOID AN INTERRUPTION IN SERVICE, PLEASE MAIL YOUR PAYMENT TODAY.
 IF YOUR PAYMENT HAS BEEN MAILED, PLEASE ACCEPT OUR THANKS
 AND DISREGARD THE ABOVE NOTICE.

PREVIOUS BALANCE DUE		49.39	
PAYMENTS RECEIVED		0.00	
ADJUSTMENTS TO PREVIOUS INVOICE		0.00	
PAST DUE BALANCE DUE IMMEDIATELY	*****>		49.39
MONTHLY SERVICE CHARGE		0.00	
USAGE CHARGES		21.22	
ADJUSTMENTS TO CURRENT INVOICE		35.00	
FEDERAL TAX		0.64	
STATE TAX		1.60	
FLORIDA GROSS RECEIPTS TAX		0.59	
MUNICIPALITY TAX		0.54	
CURRENT CHARGES DUE UPON RECEIPT	*****>		39.59

AMOUNT

ADJUSTMENTS TO CURRENT INVOICE
 FROM CONTACT ACQUIRING CHG.
 FROM ACCOUNT CODE CHARGE

10.65
 3.21

 13.86

NO. 2) 305662240

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DUFAT.	AMOUNT	CD	FAC
1/25	2:56 PM	MIA	(203)347-2320	FASSAIC	2.3	0.50		
TOTALS FOR AREA CODE 203 (0 CALLS 3)						2.3		0.50
1/23	12:22 AM	MIA	(404)590-0329	MARIETTA	7.0	1.54		
1/23	12:23 AM	MIA	(404)590-0329	MARIETTA	2.9	1.93		
2/04	2:41 PM	MIA	(404)590-0329	MARIETTA	5.5	1.29		
2/05	11:06 AM	MIA	(404)590-0329	MARIETTA	20.4	2.25		
2/06	11:42 AM	MIA	(404)590-0329	MARIETTA	1.0	0.55		
TOTALS FOR AREA CODE 404 (0 CALLS 5)						32.9		7.23

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DUFAT.	AMOUNT	CD	FAC
			(0 CALLS 6)		35.2	7.63		
		PAC	(0 CALLS 6)		35.2	7.63		

NO. 1) 33262240

DATE	TIME	ORIG. CITY	NUMBER	CALLED CITY	CALLED	DURAT.	AMOUNT	CD	PAC
2/28	2:03 PM	MIAMI	(305) 971-4300	TAMPA		3.0	3.00		
		TOTALS FOR AREA CODE 305 (0 CALLS		3)		3.0	3.00		
		3054300000		(0 CALLS	3)	3.0	3.00		
		PAC		3 (0 CALLS	3)	3.0	3.00		

ADVANCED TELECOMMUNICATIONS CORPORATION / 1020 N.W. 103rd DR. / MIAMI, FL 33169 / FOR BILLING INQUIRIES: (305) 624-0164
 2/28/92 REC 113 TYPE 233 CUST# 337303 INVO 34378 CYCLE 33 PAGE 2 OF 35

NO. 1) 3056622400

DATE	TIME	ORIG. CITY	NUMBER	CALLED CITY	CALLED	DURAT.	AMOUNT	CD	PAC
2/28	12:22 AM	MIAMI	(215) 472-4374	PASSAIC		1.0	1.00		EC
		TOTALS FOR AREA CODE 215 (0 CALLS		3)		1.0	1.00		
1/29	12:24 PM	MIAMI	(404) 590-0329	MARIETTA		10.7	2.00		EC
2/24	2:55 PM	MIAMI	(404) 449-6183	MORCROSS		7.3	2.00		EC
2/25	2:12 PM	MIAMI	(404) 590-0329	MARIETTA		20.5	4.40		EC
2/26	2:22 PM	MIAMI	(404) 590-0329	MARIETTA		1.7	1.00		EC
		TOTALS FOR AREA CODE 404 (0 CALLS		4)		39.2	8.40		
2/24	2:06 PM	MIAMI	(515) 342-3724	DES MOINES		1.0	1.47		EC

ADVANCED TELECOMMUNICATIONS CORPORATION / 1020 N.W. 103rd DR. / MIAMI, FL 33169 / FOR BILLING INQUIRIES: (305) 624-0164
 2/25/92 REC 113 TYPE 233 CUST# 337303 INVO 34378 CYCLE 33 PAGE 7 OF 35

DATE	TIME	ORIG. CITY	NUMBER	CALLED CITY	CALLED	DURAT.	AMOUNT	CD	PAC
		TOTALS FOR AREA CODE 515 (0 CALLS		3)		6.8	2.47		
		3056622400		(0 CALLS	6)	47.2	10.22		
		PAC		20 (0 CALLS	6)	47.2	10.22		

NO. 2) TRAVEL

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/25	2:03 PM	MIAMI	(304) 970-3729	DALLAS	2.3	0.22		33
TOTALS FOR AREA CODE 304 (1 CALLS)						2.3		
2/25	2:08 PM	MIAMI	(407) 333-3232	DIA ASST	2.0	0.20		33
2/25	4:03 PM	MIAMI	(407) 290-3276	ORLANDO	2.7	0.24		33
TOTALS FOR AREA CODE 407 (2 CALLS)						2.7		
2/25	2:03 PM	MIAMI	(305) 335-3212	DIA ASST	1.0	0.20		33
2/25	2:03 PM	MIAMI	(305) 774-3221	TIPPA	2.3	0.22		33
TOTALS FOR AREA CODE 305 (2 CALLS)						2.3		

ADVANCED TELECOMMUNICATIONS CORPORATION / 1030 N.W. 103rd DR. / MIAMI, FL 33168 / FOR BILLING INQUIRIES: (305) 624-0164
 2/25/92 REG 113 TYPE 233 CUST# 117311 INVO 14372 CYCLE 27 PAGE 22 OF 35

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/25	2:33 PM	MIAMI	(912) 737-7472	DACON	2.6	0.27		33
TOTALS FOR AREA CODE 912 (1 CALLS)						2.6		
3036622403 (1 CALLS)						7.7		
PAC 33 (1 CALLS)						7.7		

ADVANCED TELECOMMUNICATIONS CORPORATION / 1030 N.W. 103rd DR. / MIAMI, FL 33168 / FOR BILLING INQUIRIES: (305) 624-0164
 2/23/92 REG 113 TYPE 233 CUST# 117311 INVO 14372 CYCLE 27 PAGE 23 OF 35

NO. 2) TRAVEL

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
1/31	12:03 PM	NORTH DADE	(305) 432-6059	HOLLYWOOD	1.5	0.20		93
1/31	12:12 PM	NORTH DADE	(305) 781-3889	HOLLYWOOD	1.3	0.22		93
TOTALS FOR AREA CODE 305 (2 CALLS)						2.6		
TRAVEL (2 CALLS)						2.6		
PAC 93 (2 CALLS)						2.6		

-----TOTAL-----	#CALLS	DURAT.	AMOUNT
0000	6	35.2	7.63
0001	3	3.3	0.65
0002	6	47.2	20.22
0003	6	7.7	2.20
0091	2	2.6	1.52
TOTAL	23	76.0	22.22

-----TOTAL-----	#CALLS	DURAT.	AMOUNT
3556622400	19	93.4	20.70
TRAVEL	2	2.6	0.52
TOTAL		96.0	21.22



AREA CODE SUMMARY

AREA CODE	#CALLS	MINUTES	AMOUNT	AREA CODE	#CALLS	MINUTES	AMOUNT
203	2	3.5	0.76	214	1	0.5	0.11
305	2	2.6	0.52	404	1	72.1	15.62
407	2	3.7	0.64			6.8	1.47
813	3	6.2	1.53			2.6	0.57



EXHIBIT _____
(MJD - 4)

EXHIBIT

TSE 4 8/24/77 MO

PLEASE ENTER THE AMOUNT REMITTED AND
 RETURN THIS PAGE WITH YOUR PAYMENT =====>

*****	AMOUNT DUE
*****	*****
*****	111.44
*****	*****

T.S.I.
 12221 S.W. 129TH COURT STE 230
 MIAMI, FL 33186

ATC
 P.O. BOX 693940
 MIAMI, FL 33269-0940

3577440000111443577440000111444

FOR INQUIRIES. RESIDENTIAL CUSTOMERS CALL 1-800-330-0700
 COMMERCIAL CUSTOMERS CALL 1-800-320-1111.

ATC IS A PROUD PROVIDER OF LONG DISTANCE SERVICES
 TO OUR MEN AND WOMEN SERVING IN THE PERSIAN GULF WAR. WE
 EXTEND OUR BEST WISHES FOR THEIR SPEEDY AND SAFE RETURN.

OUR RECORDS INDICATE YOUR ACCOUNT IS DELINQUENT.
 TO AVOID AN INTERRUPTION IN SERVICE, PLEASE MAIL YOUR PAYMENT TODAY.
 IF YOUR PAYMENT HAS BEEN MAILED, PLEASE ACCEPT OUR THANKS
 AND DISREGARD THE ABOVE NOTICE.

PREVIOUS BALANCE DUE	66.34	
PAYMENTS RECEIVED	0.00	
ADJUSTMENTS TO PREVIOUS INVOICE	0.00	
PAST DUE BALANCE DUE IMMEDIATELY		66.34
RING AMERICA PLAN FEE	7.50	
USAGE CHARGES	30.63	
ADJUSTMENTS TO CURRENT INVOICE	0.00	
FEDERAL TAX	1.15	
STATE TAX	2.34	
FLORIDA GROSS RECEIPTS TAX	0.77	
MUNICIPALITY TAX	2.51	
CURRENT CHARGES DUE UPON RECEIPT		45.10
TOTAL AMOUNT DUE		111.44

NO. 1) 305-251-3565

DATE	TIME	ORIG.	CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/13	3:50 PM	PERRINE		(404)434-4487	SMYRNA	2.0	0.43		
2/13	4:45 PM	PERRINE		(404)434-4487	SMYRNA	2.0	0.43		
2/13	4:48 PM	PERRINE		(404)434-4487	SMYRNA	2.0	0.43		
2/22	2:26 PM	PERRINE		(404)508-8316	ATLANTA	2.0	0.43		

TOTALS FOR AREA CODE 404 (0 CALLS 4) 6.0 1.64

1/29	11:34 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
1/29	11:37 AM	PERRINE		(407)750-2733	BOCA RATON	3.0	0.65		
1/29	11:43 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
1/29	2:54 PM	PERRINE		(407)750-2733	BOCA RATON	2.0	0.45		
1/29	2:58 PM	PERRINE		(407)750-2733	BOCA RATON	2.0	0.45		
1/29	4:39 PM	PERRINE		(407)362-3115	BOCA RATON	1.0	0.25		

DATE	TIME	ORIG.	CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
1/30	3:02 PM	PERRINE		(407)750-2733	BOCA RATON	3.0	0.65		
1/30	3:49 PM	PERRINE		(407)750-2733	BOCA RATON	3.0	0.65		
1/30	4:35 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
1/31	10:31 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
1/31	11:11 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
1/31	4:59 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.45		
2/04	10:01 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/04	2:55 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/05	5:28 PM	PERRINE		(407)241-8219	BOCA RATON	3.0	0.00		
2/07	2:44 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/07	2:48 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/07	2:51 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/07	3:08 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/07	3:11 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/07	3:14 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		

DATE	TIME	ORIG.	CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/07	4:44 PM	PERRINE		(407)362-3115	BOCA RATON	3.0	0.64		
2/11	12:12 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:17 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:20 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:24 AM	PERRINE		(407)750-2733	BOCA RATON	2.0	0.44		
2/12	11:28 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:32 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:35 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/12	11:36 AM	PERRINE		(407)750-2733	BOCA RATON	2.0	0.44		
2/12	4:43 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/13	2:03 PM	PERRINE		(407)362-3115	BOCA RATON	1.0	0.25		
2/13	2:04 PM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/14	10:01 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		
2/15	11:06 AM	PERRINE		(407)362-3115	BOCA RATON	2.0	0.44		

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/15	3:42 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/18	2:07 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.00		
2/19	1:43 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/20	1:55 PM	PERRINE	(407)362-3115	BOCA RATON	3.0	0.64		
2/20	4:49 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/20	4:52 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/20	4:56 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/20	5:42 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.00		
2/20	5:44 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.00		
2/20	5:44 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.00		
2/20	5:51 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.00		
2/20	5:55 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.00		
2/20	5:58 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.00		
2/21	9:04 AM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.44		
2/21	9:07 AM	PERRINE	(407)750-2733	BOCA RATON	3.0	0.64		

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/21	11:12 AM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	11:15 AM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	11:19 AM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	4:03 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	4:06 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	4:09 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/21	4:12 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.44		
2/21	4:15 PM	PERRINE	(407)750-2733	BOCA RATON	3.0	0.64		
2/21	4:50 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.44		
2/21	4:53 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.44		
2/21	5:00 PM	PERRINE	(407)750-2733	BOCA RATON	2.0	0.00		
2/22	1:52 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/25	12:13 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/25	1:24 PM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		
2/25	4:56 PM	PERRINE	(407)362-3079	BOCA RATON	2.0	0.44		

DATE	TIME	ORIG. CITY	NUMBER CALLED	CITY CALLED	DURAT.	AMOUNT	CD	PAC
2/25	5:04 PM	PERRINE	(407)362-3079	BOCA RATON	1.0	0.00		
2/25	5:09 PM	PERRINE	(407)362-3079	BOCA RATON	2.0	0.00		
2/26	10:37 AM	PERRINE	(407)362-3115	BOCA RATON	2.0	0.44		

TOTALS FOR AREA CODE 407 (9 CALLS 69) 144.0 26.45

2/19	2:20 PM	PERRINE	(801)765-5310	KEARNS	2.0	0.43		
2/19	2:23 PM	PERRINE	(801)765-5310	KEARNS	2.0	0.43		

TOTALS FOR AREA CODE 801 (2 CALLS 2) 4.0 0.86

1/30	10:51 AM	PERRINE	(813)881-1044	TAMPA	1.0	0.27		
1/30	10:52 AM	PERRINE	(813)881-1044	TAMPA	1.0	0.27		
2/04	1:49 PM	PERRINE	(813)281-0067	TAMPA	2.0	0.47		

EXHIBIT _____
(MJD - 5)



EXHIBIT
PSI#5 8/21/74
MS

IMPORTANT NOTICE

GERVASI ALBERTO
10440 SW 158TH CT.
APT #7211
MIAMI

FL 33186-0000

ACCOUNT NUMBER: 101-180471
DATE OF NOTICE: 11/30/80

Dear Customer,

Our records indicate that your payment of \$ 20.73 has not been received.

Please check your records. If your payment has been mailed, please advise us this notice. Your account is important to us. Should you have any questions, contact us at the numbers listed below.

Thank you for your co-operation.

ADVANCE TELECOMMUNICATIONS CORP.
COLLECTION DEPARTMENT
1010 N.W. 103RD DRIVE
MIAMI, FL 33186

Florida : 407-1188
Miami : 824-8381
Outside Florida : 1-800-298-8000
Outside Florida: 1-800-700-2100

EXHIBIT _____
(MJD - 6)



1020 N.W. 163rd Drive
Miami, FL 33169
(305) 624-9351
(800) 330-5050

EXHIBIT

TSI#6 8/24/99
MG

CASTRO, AMALIA
9701 NW 5TH LN
MIAMI FL 33172

12/06/90

Account Number: 0354745
Amount Due: \$21.85

Handwritten: P. 52

Dear Customer:

WE ARE DISAPPOINTED!!!

Your account is still past due despite our request for payment.

You have seven days to make satisfactory arrangements before we begin additional collection procedures.

Send your payment...now! And make all future payments on time. If there are any problems, please call us today.

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Dade: 624-9351
In Florida 1-800-330-5050
Out of State 1-800-780-2100
MRI

EXHIBIT _____
(MJD - 7)



1020 N.W. 163rd Drive
Miami, FL 33169
(305) 624-9351
(800) 330-5050

To: Noel

EXHIBIT
CONV 18/24/94
TSI#7 MG

LA ROSA DEL MONTE EXPRESS INC.
7675 NW 66TH STREET

02/26/91

MIAMI, FL 331650000

ACCOUNT NUMBER: 000211594001
AMOUNT DUE: \$94.10

Dear Customer:

Your account is important to us. Our records indicate that payment has not been received on the amount listed above.

Kindly check your records to be sure payment has been made to the address shown below. If your payment has been mailed, we thank you. If you should have any questions please call me.

ADVANCED TELECOMMUNICATIONS CORP.
ATTN: (Theresa Olivella)
1020 NW 163RD DRIVE
MIAMI, FLORIDA 33169

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Date: 624-9351
In Florida 1-800-330-5050
Out of State 1-800-780-2100

BFR



1020 N.W. 163rd Drive
Miami, FL 33169
(305) 624-9351
(800) 330-5050

LA ROSA DEL MONTE EXPRESS INC.
7675 NW 66TH STREET

03/07/91

MIAMI, FL 331660000

Account Number: 000211594001
Amount Due: \$94.10

Dear Customer,

WE HAVE CALLED YOU...

Regarding your overdue payment, but you were not available. As you know payments are due upon receipt.

Please send the total amount due of \$94.10 and all future payments on time.

Call us right away if there are any problems.

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Date: 624-9351
In Florida 1-800-330-5050
Out of State 1-800-780-2100

BYEL



1020 N.W. 163rd Drive
Miami, FL 33169
(305) 624-9351
(800) 330-5050

LA ROSA DEL MONTE EXPRESS INC.
7675 NW 66TH STREET

03/14/91

MIAMI, FL 331660000

ACCOUNT NUMBER: 000211594001
AMOUNT DUE: \$261.95

DEAR CUSTOMER,

F I N A L N O T I C E !!!

This is a formal notice for interruption of service.

Due to the past due amount, which is extremely outstanding, your service will be interrupted unless payment is received within seven (7) days.

If payment has been made please disregard this notice.

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Broward: 467-1155
In Florida 1-800-330-5050
Out of State 1-800-780-2100

BFN



1020 N.W. 163rd Drive
Miami, FL 33169
(305) 624-9351
(800) 330-5050

LA ROSA DEL MONTE EXPRESS INC.
7675 NW 66TH STREET

03/21/91

MIAMI, FL 331660000

ACCOUNT NUMBER: 000211594001
AMOUNT DUE: \$167.85

Dear Customer:

Your account is important to us. Our records indicate that payment has not been received on the amount listed above.

Kindly check your records to be sure payment has been made to the address shown below. If your payment has been mailed, we thank you. If you should have any questions please call me.

ADVANCED TELECOMMUNICATIONS CORP.
ATTN: (Theresa Olivella)
1020 NW 163RD DRIVE
MIAMI, FLORIDA 33169

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Date: 624-9351
In Florida 1-800-330-5050
Out of State 1-800-780-2100

BFR



102. 163rd Drive
M 33169
FL 331
30

To: Noel

307-3565
Cindy

LA ROSA DEL MONTE EXPRESS INC.
7675 NW 66TH STREET

04/11/91

MIAMI, FL 331660000

ACCOUNT NUMBER: 000211594001
AMOUNT DUE: \$306.88

DEAR CUSTOMER,

F I N A L N O T I C E !!!

This is a formal notice for interruption of service.

Due to the past due amount, which is extremely outstanding, your service will be interrupted unless payment is received within seven (7) days.

If payment has been made please disregard this notice.

Sincerely,

Theresa Olivella

ADVANCED TELECOMMUNICATIONS CORP.
Collection Department

Broward: 467-1155
In Florida 1-800-330-9050
Out of State 1-800-780-2100

BFN

Fush
[Signature]

EXHIBIT _____
(MJD - 8)

EXHIBIT

BI#8 8/24/94
MG

**AGREEMENT
BY AND BETWEEN
TELUS COMMUNICATIONS, INC.
AND
TELECOMM SERVICES INC.**

JULY 1989

PLAINTIFFS

EXHIBIT A

ON-NET INTERSTATE

<u>LATA</u>	<u>CITY</u>
128	Boston
132	New York
222	Delaware Valley
224	North Jersey
228	Philadelphia
234	Pittsburgh
236	Washington, D.C.
238	Baltimore
320	Cleveland
322	Youngstown
324	Columbus
325	Acron
328	Dayton
336	Indianapolis
340	Detroit
348	Grand Rapids
358	Chicago
422	Charlotte
424	Raleigh
438	Atlanta
470	Nashville
490	New Orleans
520	St. Louis
552	Dallas
560	Houston
628	Minneapolis
656	Denver
722	San Francisco
730	Los Angeles
920	Connecticut

AGREEMENT

This Agreement is entered into on July 7th, 1989, by and between Telus Communications, Inc., a Florida corporation with an office at 1020 N.W. 163 Drive, Miami, Florida 33169, (hereinafter "Telus"), and Telecom Services Inc. a Florida corporation with an office at _____ (hereinafter "T.S.I.").

Whereas, T.S.I. desires to receive the services described in the Service Descriptions and related Exhibit A attached hereto and incorporated herein (hereinafter the "Service") from Telus, and Telus is willing to provide the Service pursuant to the terms and conditions set forth herein:

Now, therefore, T.S.I. and Telus hereby mutually agree as follows:

GENERAL SCOPE OF SERVICE

Telus and T.S.I. agree that Telus will perform the following services listed below under the following terms and conditions contained in this document.

1. Act as agent for all T.S.I. customers in inter-connection with Local Exchange Carriers (LEC) and other

- carriers (IXC) for processing of service orders related to switched access for installation of new or additional service and or disconnection of said service and/or cancellation of said service per T.S.I. request.
2. Switch traffic from all Telus' Fg-A originating groups from Telus' switching sites.
 3. To bill and receive revenue at our P. O. Box from billable records as reported by the DSC 400 switching system generated from completed calls for T.S.I. customers identified by auth codes. Billing would extend to actual mailing of each invoice by Telus to all T.S.I. customers.
 4. To generate end of month reports relevant to traffic distribution and tape output of relevant T.S.I. CDR, call distribution reports.

TERMS AND AGREEMENT

The minimum term of this agreement will be 1 year which will commence at the signing of this contract.

PAYMENT & DEPOSITS DISPUTES

Telus reserves the right to require a deposit in the event it is determined that T.S.I. has been delinquent in its payment to Telus for services rendered.

METHOD OF SERVICE

All T.S.I. customers will be turned up through FG-A facilities with the use of Dialers. The Dialers Purchase, Installation and Maintenance will be the sole responsibility of T.S.I. Each T.S.I. customer will be assigned with an auth code to access Telus' network on a customer by customer basis to a designated point of contact at T.S.I.

DOMESTIC TRAFFIC

The Rate Structure will be as outlined below for Domestic and International traffic. Traffic is divided into four areas.

IntraLATA Traffic or (South East traffic LATA 460)

InterLATA Traffic (Originating South East
Terminating outside of LATA 460)

Interstate Private Lines (Originating South East
Terminating Interstate on Net*)

Interstate all other areas.

The rates quoted will be for all periods i.e. Day/Evening/Night-Weekend. All calls will be billed in 6 second increments.

COST PER MINUTE

	Day	Evening	N/Weekend
IntraLATA	.12	.12	.12
InterLATA	.125	.125	.125
Interstate on NET	.14	.14	.14
Interstate All Other	.15	.15	.15

*All interstate on NET will be defined in Exhibit A.

INTERNATIONAL RATES

International traffic will be at rates currently filed in Telus' Tariff but will be billed to T.S.I. full minute rounding for the first minute and 6 second increments for each additional minute.

1-800 TRAVEL

In the event T.S.I. customers require a 1-800 travel number, Telus will provide a specific 1-800-780-XXXX for this purpose. This number will be accessed through an auth code which will be assigned per customer. The rates will be as follows:

	DAY	EVENING	NIGHT
1-800	.195		

1-800 NXX-XXXX ASSIGNED

In the event each T.S.I. customer requires a full 1-800-780-XXXX to be assigned exclusively for their purpose, Telus will do the necessary translation to achieve this at the rates listed below:

	<u>COST PER MINUTE</u>		
	DAY	EVENING	NIGHT
1-800	.21		

Fixed charge of \$5 per 800 number per month.

FRAUD

Due to the nature of access, Telus will hold T.S.I. liable and responsible for all fraud which might occur on the auth codes assigned. Telus will offer the full capability of its resources to monitor those auth codes for fraud but will not assume or be responsible for any determined fraud as a result of its monitoring.

CANCELLATION

If T.S.I. cancels this agreement within the initial term agreed for any reason or reasons other than a material breach of the terms and conditions contained herein, T.S.I. will be liable for the minimum charge per month as contained in this agreement for that period of time from the date of

receipt of cancellation to the end of the agreed upon term. T.S.I.'s failure to obtain or maintain any necessary certificates, permits, licenses or other authority required to receive Services or to maintain Equipment on the premises at each of T.S.I.'s sites.

MINIMUM CHARGE

Telus will require T.S.I. to pay a minimum charge per month equating to the total monthly billing or a fixed charge of \$5,000 per month if T.S.I. proposes to cancel this agreement outside the terms of this agreement under the cancellation clause.

SUSPENSION AND OR TERMINATION OF SERVICE

In the event payment in full is not received from T.S.I. by Telus or on before the due date as described in this agreement, Telus shall have the right, on or after the tenth calendar day after Telus has given T.S.I. written notice of non-payment in accordance with this agreement temporarily suspend all Service to T.S.I. (either completely or only with respect to any affected segments, as Telus may at its option elect) until such time as T.S.I. has paid in full all arrearages, including any late fees of 1 1/2% specified herein, or to terminate Service (either completely or only with respect to any affected segments, as Telus may at its option elect), at Telus' option. Further, the Service provided by Telus to T.S.I. is subject to the condition that

it will not be used by T.S.I. for any unlawful purpose or in any unlawful manner, and may be terminated or suspended by Telus, at Telus' option, if any such prohibited use occurs.

INDEMNIFICATION

In no event shall Telus or T.S.I. be liable to the other for any incidental, indirect consequential or special damages, or loss of revenues or profits, whether or not either party has been notified of the possibility of such damages.

FORCE MAJEURE

Any other term or provision in this Agreement to the contrary notwithstanding, Telus shall not be liable to T.S.I. or any other person, firm or entity for any failure of performance hereunder if such failure is due to any causes or causes beyond the reasonable control of Telus, which causes shall include, without limitation, acts of God, fire, flood, power failures, explosion, vandalism, cable cut, storm or other similar occurrences; any law, order, regulation, direction, action or request of the United States government, or of any other government, including state and local governments, or of any civil or military authority; national emergencies; insurrections; riots; wars; or strikes, lock-outs, work stoppages or other labor difficulties; or shortages of equipment or supplies, breaches, unavailability of transportation, acts or omissions or anyone (other than the intentional or negligent

actions of Telus or its agents). If Telus' failure of performance by reason of force majeure specified above shall be for (i) thirty (30) days or less, then this Agreement shall remain in effect, but an appropriate percentage of charges shall be abated in the discretion and determination of Telus; and (ii) more than thirty (30) days, then this Agreement may be cancelled by either party without liability whatsoever on the part of any party.

This Agreement shall be binding on Customer and its respective successors and assigns. Customer may not assign this Agreement, whether by operation of law or otherwise, without the prior written consent of T.S.I., which agreement shall not be unreasonably withheld. T.S.I. may terminate this Agreement in the event of a change in control of Customer without T.S.I.'s prior written consent.

This offer shall remain open and be capable of being accepted by Customer until July, 1989. Any and all prior offers made to Customer, whether written or oral, shall be superseded by this offer. Exclusive of any Tariff modifications initiated by T.S.I., once this Agreement has been executed, any amendments hereto must be made in writing and signed by both parties.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement.

TELECOMM SERVICES INC.
A Florida Corporation

By: _____

Title: _____

Date: _____

[Signature]
President.
7/7/89

) Notary Public in the
) State of FLORIDA

Neil Beckman
7/7/89

My Commission expires: _____

DATE
NOTARY PUBLIC, STATE OF FLORIDA,
MY COMMISSION EXPIRES JAN. 24, 1992.
SEEDED FROM NOTARY PUBLIC UNDERWRITER

TELUS COMMUNICATIONS, INC.
A Florida Corporation

By: _____

Title: _____

Date: _____

[Signature]
Vice President
July 7 1989

) Notary Public in the
) State of FLORIDA

Neil Beckman
7/7/89

My Commission expires: _____

DATE
NOTARY PUBLIC, STATE OF FLORIDA,
MY COMMISSION EXPIRES JAN. 24, 1992.
SEEDED FROM NOTARY PUBLIC UNDERWRITER

ADDENDUM TO CONTRACT BETWEEN
TELUS COMMUNICATIONS, INC. AND
TELECOM SERVICES, INC.

Telus will provide installation of dialers for TSI
at a rate of \$10.00 per line.

Maintenance of these dialers will be done by TSI.

The \$10.00 charge covers installation only.


TELUS COMMUNICATIONS, INC.


TELECOM SERVICES, INC.

Canada

3-6

RATE	
1st MIN	ADD'L MIN
0.5500	0.5200
0.6100	0.6000
0.6400	0.6300
0.6700	0.6600
0.7000	0.6900

6-11

RATE	
1st MIN	ADD'L MIN
0.3500	0.3300
0.3900	0.3900
0.4100	0.4000
0.4300	0.4200
0.4500	0.4400

KIND 11-3

RATE	
1st MIN	ADD'L MIN
0.2200	0.2000
0.2400	0.2400
0.2500	0.2500
0.2600	0.2600
0.2800	0.2700

*Diagonal
 a (Chassis)
 are (Chassis)
 (Diagonal) rates
 to Domestic
 Area (Continental)*

Mexico

22	Mexico	700-799	Mon-Fri	01.01	01.20
		800-899	Sat, Sun	01.01	01.20

700-799	Mon-Fri	01.25	01.02
800-899	Sat, Sun	01.25	01.02

TELUS

TELUS COMMUNICATIONS INC

August 22, 1989

Mr. Joel Esquenazi
Telecom Services
14869 S.W. 104th Street #1400
Miami, Florida 33196

Dear Joel:

This letter shall serve to confirm your DAL/Carrier rates as per the contract initiated with Dennis on July 7, 1989.

*** For one dedicated circuit, or a T-1, the rates are as follows:

.09 Intrastate (daytime)
.12 Interstate (daytime)
\$5.00 per port, per month recurring charge

In addition, you are now offered a evening/night/weekend calling card rate. It is .15 per minute, and will apply to all Telecom users.

Please advise me if you have any questions.

Sincerely,



Stacy Anapora
Assistant to Vice President
Administration

isa

cc: File

NATIONAL HEADQUARTERS
1000 W. 10th St
Miami, FL 33139
Phone (305) 324-2400
Toll Free (800) 324-2400

REGIONAL OFFICES
1000 W. 10th St
Miami, FL 33139
Phone (305) 324-2400

REGIONAL OFFICES
1000 W. 10th St
Miami, FL 33139
Phone (305) 324-2400

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REGIONAL OFFICES
1000 W. 10th St
Miami, FL 33139
Phone (305) 324-2400

CONTROL BY
FEDERAL
COMMUNICATIONS
COMMISSION
FLORIDA PUBLIC
SERVICE COMMISSION

TELUS

TELUS COMMUNICATIONS INC

June 21, 1989

Mr. Joel Esquenazi
Telecommunications Services Inc.

Dear Mr. Esquenazi,

We have reviewed the scenarios you described to us regarding the processing of your traffic. We have four (4) methods of originating your traffic. vis-a-vis:

Feature Group A With Dialers
Feature Group D Equal Access
Direct Access Line
WATS Access Line

The method of processing we are exploring specifically is Feature Group A with Dialers.

All "Telecommunications Services Inc." customers will be turned up on Feature Group A with an option for international calling. If access is required through any other of the four (4) methods listed above, a different rate schedule will apply.

We can accommodate 800 service from a travel point of view and from an 800 NYX XXXX assignment method. We would need more time to develop a rate.

The issues discussed in detail are rates for domestic traffic and managing your dialer program exclusive of dialer purchase.

NATIONAL HEADQUARTERS
1000 W. 12th St
Winnipeg, MB
R2S 2K6
PHONE (204) 581-2400
TELETYPE (204) 581-2400
FAX (204) 581-4320

JACKSONVILLE
1000 W. 12th St
Suite 101
Jacksonville, FL 32202
PHONE (904) 731-1111

PALM BEACH
1000 W. 12th St
Suite 101
Palm Beach, FL 33480
PHONE (407) 833-1111

MIAMI
1000 W. 12th St
Suite 101
Miami, FL 33136
PHONE (305) 575-1111

MIAMI
1000 W. 12th St
Suite 101
Miami, FL 33136
PHONE (305) 575-1111

TAMPA
1000 W. 12th St
Suite 101
Tampa, FL 33606
PHONE (813) 288-1111

TELUS
COMMUNICATIONS
INCORPORATED
2000 W. 12th St
Winnipeg, MB
R2S 2K6

TELUS

TELECOMMUNICATIONS INC

NATIONAL HEADQUARTERS
1020 NW 16th DR.
MIAMI, FL 33169
DACE (305) 624-2400
BROWARD (305) 794-7008
SALES (305) 524-8229

JACKSONVILLE
8021 PHILIPS HWY.
SUITE 206
JACKSONVILLE, FL 32256
(904) 737-1100

PALM BEACH
200 WYNDHURST RD.
SUITE 206
WYNDHURST, FL 33411
(407) 582-1118

ORLANDO
3165 VICTORY BLVD.
SUITE 206
ORLANDO, FL 32810
(407) 898-1611

WEST PALM BEACH
4585 PALM BEACH BLVD.
SUITE 206
WEST PALM BEACH, FL 33411
(407) 993-2100

TAMPA
5121 SEALBOND CENTER BLVD.
SUITE 206
TAMPA, FL 33634
(813) 886-2500

LICENSED BY
FEDERAL
COMMUNICATIONS
COMMISSION
FLORIDA PUBLIC
SERVICE COMMISSION

August 4, 1989

Mr. Joel Esquenazi
Telecomm Services
14869 S.W. 104th Street Suite 1400
Miami, Florida 33196

Dennis has arranged for a P.O. Box for your clients to remit payment. It is listed under Telecomm Services, and is currently functional.

P.O. Box 693661

Please advise your customer's accordingly.

Feel free contact me if you should have any questions.

Sincerely,



Stacy Scampora
Assistant to Vice President
Administration

:saa

cc: File

RATES:

IntraLATA Rates	= 11.2 cents/minute
Intrastate	= 11.7 cents/minute
N E Inter Private Line	= 12.8 cents/minute
All Other Inter (Excluding Hawaii, Alaska, Puerto Rico)	= 15 cents/minute

All billing will be done in 6 second increments.

Dialers


We would manage all installations and maintenance aspects of your dialer program. As discussed without the purchase of dialers and ancillary equipment such as connecting block, power supplies, etc. The cost would be \$30 per line for installation and one cent per minute for upkeep and maintenance.

Joel, these are the two main areas we discussed. We would be pleased to provide offers for other services, however, I think we need to discuss them in more detail.

This letter represents a Proposal not a formal agreement which will follow.

Sincerely,

TELUS COMMUNICATIONS, INC.



Rudolph A. McGlashan
Vice President-Operations

/jaa

INTERNATIONAL LOCATIONS
AND SERVICE RATES

TELUS COMMUNICATIONS, INC

	STANDARD	STANDARD TIME--		DISCOUNT	DISCOUNT TIME--		ECONOMY	ECONOMY TIME---	
	TIME	1ST MIN	ADD'L MIN		TIME	1ST MIN		ADD'L MIN	TIME
Algeria	6AM-12MIDN	\$3.70	\$1.30	12MIDN-5PM	\$7.03	\$1.03	5PM-6AM	\$1.61	\$0.03
American Samoa	5PM-11PM	\$3.07	\$1.44	10AM-5PM	\$7.91	\$1.09	11PM-10AM	\$2.32	\$0.06
Andorra	7AM-1PM	\$1.63	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Anguilla	4PM-10PM	\$1.47	\$0.90	7AM-4PM	\$1.09	\$0.74	10PM-7AM	\$0.00	\$0.39
Antigua	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Argentina	6AM-6PM	\$2.30	\$0.94	6PM-12AM	\$1.63	\$0.71	12MIDN-6AM	\$1.33	\$0.66
Aruba	4PM-10PM	\$1.67	\$0.90	7AM-4PM	\$1.09	\$0.74	10PM-7AM	\$0.00	\$0.39
Assoneton Island	6AM-12MIDN	\$2.70	\$1.30	12MIDN-5PM	\$7.03	\$1.03	5PM-6AM	\$1.61	\$0.03
Australia	7PM-6PM	\$2.00	\$1.14	6PM-3AM	\$2.30	\$0.07	3AM-7PM	\$2.16	\$0.00
Austria	7AM-1PM	\$1.64	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Bahamas	6AM-3PM	\$1.07	\$0.72	3PM-11PM	\$0.79	\$0.34	11PM-6AM	\$0.75	\$0.31
Bahrain	6AM-3PM	\$1.43	\$1.24	3PM-6AM	\$3.30	\$0.93	6PM-9PM	\$2.07	\$0.74
Bangladesh	4PM-1AM	\$4.09	\$2.03	1AM-11AM	\$3.47	\$1.32	11AM-6PM	\$2.99	\$1.21
Barbados	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Belgium	7AM-1PM	\$1.63	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Belize	5PM-11PM	\$2.45	\$1.05	6AM-3PM	\$1.04	\$0.79	11PM-6AM	\$1.46	\$0.63
Benin	6AM-12MIDN	\$2.70	\$1.30	12MIDN-5PM	\$2.03	\$1.03	5PM-6AM	\$1.61	\$0.03
Bermuda	6AM-3PM	\$1.36	\$0.64	3PM-11PM	\$0.93	\$0.63	11PM-6AM	\$0.75	\$0.30
Bhiva	4PM-12AM	\$2.59	\$1.10	7AM-4PM	\$1.94	\$0.83	12AM-7AM	\$1.35	\$0.66
Brazil	6AM-6PM	\$2.16	\$0.93	6PM-12AM	\$1.65	\$0.71	12MIDN-6AM	\$1.35	\$0.66
British Virgin Isle	6AM-3PM	\$1.47	\$0.90	3PM-11PM	\$1.09	\$0.74	11PM-6AM	\$0.00	\$0.39
Brunei	5PM-11PM	\$3.93	\$1.47	10AM-5PM	\$2.97	\$1.11	11PM-10AM	\$2.37	\$0.00
Bulgaria	1PM-3AM	\$2.22	\$1.24	7AM-1PM	\$1.64	\$0.93	2AM-7AM	\$1.32	\$0.74
Burkina Faso	6AM-12MIDN	\$2.30	\$1.32	12MIDN-5PM	\$1.04	\$0.90	5PM-6AM	\$1.34	\$0.79
Cayman Islands	6AM-3PM	\$1.57	\$1.05	3PM-11PM	\$1.17	\$0.79	11PM-6AM	\$0.94	\$0.63
Chile	6AM-6PM	\$2.59	\$1.10	6PM-12AM	\$1.94	\$0.83	12MIDN-6AM	\$1.35	\$0.66
China	5PM-3AM	\$5.57	\$1.47	3AM-11AM	\$4.17	\$1.11	11AM-5PM	\$3.34	\$0.00
Colombia	4PM-12AM	\$2.59	\$1.10	7AM-4PM	\$1.94	\$0.83	12AM-7AM	\$1.35	\$0.66
Costa Rica	5PM-11PM	\$2.45	\$1.05	6AM-3PM	\$1.04	\$0.79	11PM-6AM	\$1.46	\$0.63
Cyprus	7AM-1PM	\$2.22	\$1.24	1PM-6PM	\$1.64	\$0.93	6PM-7AM	\$1.32	\$0.74
Czechoslovakia	7AM-1PM	\$2.22	\$1.24	1PM-7AM	\$1.59	\$0.90	12AM-7AM	\$1.44	\$0.81
Denmark	7AM-1PM	\$1.64	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Dominica	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
East Germany	7AM-1PM	\$2.22	\$1.24	1PM-6PM	\$1.64	\$0.93	6PM-7AM	\$1.32	\$0.74
Ecuador	4PM-12AM	\$2.59	\$1.10	7AM-4PM	\$1.94	\$0.83	12AM-7AM	\$1.35	\$0.66
Egypt	1PM-2AM	\$2.70	\$1.30	7AM-1PM	\$2.03	\$1.03	2AM-7AM	\$1.61	\$0.03
El Salvador	5PM-11PM	\$2.45	\$1.05	6AM-3PM	\$1.04	\$0.79	11PM-6AM	\$1.46	\$0.63
Ethiopia	1PM-2AM	\$2.70	\$1.30	7AM-1PM	\$2.03	\$1.03	2AM-7AM	\$1.61	\$0.03

INTERNATIONAL LOCATIONS
AND SERVICE RATES

TI'S COMMUNICATIONS, INC.

	STANDARD	-- STANDARD TIME --		DISCOUNT	-- DISCOUNT TIME --		ECONOMY	-- ECONOMY TIME --	
	TIME	1ST MIN	ADD'L MIN		TIME	1ST MIN		ADD'L MIN	TIME
Fiji Islands	3PM-2AM	\$3.95	\$1.47	9AM-1PM	\$7.97	\$1.11	2AM-9AM	\$2.37	\$0.00
Finland	7AM-1PM	\$2.16	\$1.21	1PM-6PM	\$1.62	\$0.91	6PM-7AM	\$1.29	\$0.72
France	7AM-1PM	\$1.63	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.44
French Antilles	6AM-3PM	\$1.57	\$1.05	3PM-11PM	\$1.37	\$0.79	11PM-6AM	\$0.94	\$0.43
French Guiana	6AM-6PM	\$2.90	\$1.10	6PM-12AM	\$1.94	\$0.93	12AM-6AM	\$1.35	\$0.64
French Polynesia	5PM-11PM	\$3.07	\$1.44	10AM-3PM	\$2.94	\$1.09	11PM-10AM	\$2.32	\$0.64
Gabon Republic	6AM-12AM	\$2.90	\$1.32	12AM-3PM	\$1.94	\$0.90	3PM-6AM	\$1.34	\$0.70
Gambia	6AM-12AM	\$2.90	\$1.30	12AM-3PM	\$2.93	\$1.03	3PM-6AM	\$1.61	\$0.93
Gibraltar	7AM-1PM	\$2.16	\$1.21	1PM-6PM	\$1.62	\$0.91	6PM-7AM	\$1.29	\$0.72
Greece	7AM-1PM	\$1.63	\$1.03	1PM-6PM	\$1.20	\$0.77	6PM-7AM	\$1.29	\$0.72
Guadeloupe	6AM-3PM	\$1.57	\$1.05	3PM-11PM	\$1.37	\$0.79	11PM-6AM	\$0.94	\$0.43
Guam	5PM-11PM	\$3.29	\$1.22	10AM-3PM	\$2.47	\$0.93	11PM-10AM	\$2.32	\$0.64
Guantanamo Bay	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.43
Guatemala	5PM-11PM	\$2.43	\$1.05	6AM-3PM	\$1.94	\$0.79	11PM-6AM	\$1.46	\$0.63
Guyana	6AM-6PM	\$2.90	\$1.20	6PM-12AM	\$2.23	\$0.97	12AM-6AM	\$1.90	\$0.77
Honduras	5PM-11PM	\$2.43	\$1.04	6AM-3PM	\$1.93	\$0.70	11PM-6AM	\$1.45	\$0.63
Hong Kong	5PM-11PM	\$2.90	\$1.14	10AM-3PM	\$2.30	\$0.97	11PM-10AM	\$2.16	\$0.90
Hungary	7AM-1PM	\$2.22	\$1.24	1PM-6PM	\$1.66	\$0.93	6PM-7AM	\$1.32	\$0.74
Iceland	1PM-6PM	\$2.22	\$1.24	7AM-1PM	\$1.66	\$0.93	6PM-7AM	\$1.32	\$0.74
India	6PM-1AM	\$4.22	\$2.42	1AM-11AM	\$3.17	\$1.93	11AM-6PM	\$2.93	\$1.66
Indonesia	3PM-2AM	\$3.95	\$1.47	2AM-11AM	\$2.97	\$1.11	11AM-3PM	\$2.17	\$0.90
Ireland	7AM-1PM	\$1.30	\$0.90	1PM-6PM	\$1.10	\$0.72	6PM-7AM	\$1.12	\$0.60
Iceland	6AM-3PM	\$2.93	\$1.05	12AM-6AM	\$2.10	\$0.79	3PM-12AM	\$2.07	\$0.74
Italy	7AM-1PM	\$1.64	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Ivory Coast, Rep	6AM-12AM	\$2.70	\$1.30	12AM-3PM	\$2.93	\$1.03	3PM-6AM	\$1.61	\$0.93
Jamaica	4PM-10PM	\$1.47	\$0.90	7AM-4PM	\$1.09	\$0.74	10PM-7AM	\$0.90	\$0.39
Japan	2PM-6PM	\$2.90	\$1.14		\$2.30	\$0.97	3AM-3PM	\$2.16	\$0.90
Jordan	6AM-3PM	\$3.43	\$1.24	12AM-6AM	\$2.30	\$0.93	3PM-12AM	\$2.07	\$0.74
Korea	7AM-3PM	\$2.70	\$1.30	3PM-1AM	\$2.93	\$1.03	1AM-7AM	\$1.61	\$0.93
Korea	3PM-6PM	\$3.95	\$1.47	6PM-3AM	\$2.97	\$1.11	3AM-3PM	\$2.37	\$0.90
Kuwait	7AM-3PM	\$2.70	\$0.97	3PM-1AM	\$2.93	\$0.72	1AM-7AM	\$1.91	\$0.60
Lebanon	7AM-3PM	\$2.30	\$1.32	3PM-1AM	\$1.94	\$0.90	1AM-7AM	\$1.34	\$0.79
Liberia	6AM-12AM	\$2.30	\$1.32	12AM-3PM	\$1.94	\$0.90	3PM-6AM	\$1.34	\$0.79
Libya	6AM-12AM	\$2.30	\$1.32	12AM-3PM	\$1.94	\$0.90	3PM-6AM	\$1.34	\$0.79
Liechtenstein	7AM-1PM	\$1.63	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.15	\$0.64
Luxembourg	7AM-1PM	\$2.16	\$1.21	1PM-6PM	\$1.62	\$0.91	6PM-7AM	\$1.29	\$0.72
Macao	5PM-7AM	\$3.95	\$1.47	2AM-11AM	\$2.97	\$1.11	11AM-5PM	\$2.37	\$0.90
Malawi	6AM-12AM	\$2.70	\$1.30	12AM-3PM	\$2.93	\$1.03	3PM-6AM	\$1.61	\$0.93

INTERNATIONAL LOCATIONS
AND SERVICE RATES

TELUS COMMUNICATIONS, INC

	STANDARD TIME	STANDARD TIME--		DISCOUNT TIME	DISCOUNT TIME--		ECONOMY TIME	ECONOMY TIME--	
		1ST MIN	ADD'L MIN		1ST MIN	ADD'L MIN		1ST MIN	ADD'L MIN
Malaysia	7PM-2AM	\$3.05	\$1.47	2AM-11AM	\$2.97	\$1.11	11AM-5PM	\$2.37	\$0.00
Malawi	7AM-1PM	\$3.05	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Maldives	4PM-12AM	\$3.37	\$1.05	7AM-6PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Morocco	4AM-12AM	\$2.30	\$1.32	12MIDN-3PM	\$1.04	\$0.90	3PM-6AM	\$1.34	\$0.79
Norfolk	4AM-12AM	\$2.11	\$1.00	12MIDN-3PM	\$1.50	\$0.00	3PM-6AM	\$1.26	\$0.63
Netherlands	7AM-5PM	\$1.63	\$0.94	1PM-6PM	\$1.20	\$0.75	6PM-7AM	\$1.13	\$0.64
Netherlands Antilles	6AM-3PM	\$1.47	\$0.90	3PM-11PM	\$1.09	\$0.74	11PM-6AM	\$0.00	\$0.59
Nova Scotia	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
New Caledonia	3PM-11PM	\$3.05	\$0.47	10AM-3PM	\$2.97	\$1.11	11PM-10AM	\$2.37	\$0.00
New Zealand	3PM-11PM	\$3.39	\$1.22		\$2.47	\$0.93	11PM-10AM	\$2.32	\$0.64
Nicaragua	3PM-11PM	\$2.45	\$1.05	6AM-3PM	\$1.04	\$0.79	11PM-6AM	\$1.44	\$0.63
Nigeria	7AM-3PM	\$2.11	\$1.00	3PM-1AM	\$1.59	\$0.00	1AM-7AM	\$1.26	\$0.63
Norway	7AM-1PM	\$1.64	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Oman	6AM-3PM	\$3.45	\$1.04	9PM-6AM	\$2.30	\$0.93	3PM-9PM	\$2.07	\$0.74
Pakistan	6PM-1AM	\$4.16	\$1.72	1AM-11AM	\$3.12	\$1.31	11AM-6PM	\$2.93	\$1.21
Panama	3PM-11PM	\$2.06	\$0.89	6AM-3PM	\$1.55	\$0.67	11PM-6AM	\$1.45	\$0.64
Papua New Guinea	3PM-11PM	\$3.07	\$1.44	10AM-3PM	\$2.93	\$1.09	11PM-10AM	\$2.32	\$0.00
Paraguay	6AM-6PM	\$2.39	\$1.10	6PM-12AM	\$1.94	\$0.83	12MID-6AM	\$1.55	\$0.66
Peru	4PM-12AM	\$2.39	\$1.10	7AM-6PM	\$1.94	\$0.83	12AM-7AM	\$1.55	\$0.66
Philippines	3PM-2AM	\$3.36	\$1.20	2AM-11AM	\$2.52	\$0.94	11AM-3PM	\$2.37	\$0.09
Poland	7AM-5PM	\$2.32	\$1.24	1PM-12AM	\$1.59	\$0.90	12AM-7AM	\$1.44	\$0.81
Portugal	1PM-6PM	\$1.00	\$1.00	7AM-5PM	\$1.41	\$0.79	6PM-7AM	\$1.32	\$0.74
Qatar	7AM-3PM	\$3.45	\$1.04	3PM-1AM	\$2.30	\$0.93	1AM-7AM	\$2.07	\$0.74
Romania	1PM-3PM	\$2.32	\$1.24	7AM-1PM	\$1.66	\$0.97	2AM-7AM	\$1.32	\$0.74
Saint Kitts	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Saint Lucia	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Saint Pierre/Miquelon	4PM-10PM	\$1.47	\$0.90	7AM-4PM	\$1.09	\$0.74	10PM-7AM	\$0.00	\$0.59
Saint Vincent	4PM-10PM	\$1.57	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.63
Saipan	3PM-11PM	\$2.07	\$1.44	10AM-3PM	\$2.04	\$1.09	11PM-10AM	\$2.32	\$0.00
San Marino	7AM-1PM	\$1.63	\$0.90	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Saudi Arabia	7AM-5PM	\$0.64	\$0.97	3PM-1AM	\$2.02	\$0.72	1AM-7AM	\$1.91	\$0.60
Senegal	6AM-12MIDN	\$2.70	\$1.30	12MIDN-3PM	\$2.03	\$1.03	3PM-6AM	\$1.61	\$0.83
Singapore	3PM-11PM	\$2.90	\$1.14	10AM-3PM	\$2.30	\$0.67	11PM-10AM	\$2.16	\$0.00
South Africa	6AM-12MIDN	\$3.11	\$1.00	12MIDN-3PM	\$1.59	\$0.00	3PM-6AM	\$1.26	\$0.63
Spain	7AM-1PM	\$1.63	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Sri Lanka	6PM-1AM	\$4.09	\$2.03	1AM-11AM	\$3.07	\$1.32	11AM-6PM	\$2.93	\$1.21
Suriname	6AM-6PM	\$2.39	\$1.10	6PM-12AM	\$1.94	\$0.83	12MID-6AM	\$1.55	\$0.66
Switzerland	6AM-12MIDN	\$2.30	\$1.32	12MIDN-3PM	\$1.04	\$0.90	3PM-6AM	\$1.34	\$0.79

INTERNATIONAL LOCATIONS
AND SERVICE RATES

TILUS COMMUNICATIONS, INC.

	STANDARD	-STANDARD TIME--		DISCOUNT	-DISCOUNT TIME -		ECONOMY	-ECONOMY TIME---	
	TIME	1ST MIN	ADD'L MIN		TIME	1ST MIN		ADD'L MIN	TIME
Sweden	7AM-1PM	\$1.03	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Switzerland	7AM-1PM	\$1.03	\$0.92	1PM-6PM	\$1.23	\$0.69	6PM-7AM	\$1.13	\$0.64
Taiwan	7PM-11PM	\$3.34	\$1.25	10AM-3PM	\$2.32	\$0.94	11PM-10AM	\$2.37	\$0.88
Tanzania	1PM-2AM	\$2.30	\$1.32	7AM-1PM	\$1.94	\$0.90	7AM-7AM	\$1.94	\$0.79
Thailand	7PM-2AM	\$3.05	\$1.47	2AM-11AM	\$2.09	\$1.11	11AM-3PM	\$2.37	\$0.88
Togo	6AM-12PM	\$2.70	\$1.30	12PM-11PM	\$2.03	\$1.03	3PM-6AM	\$1.61	\$0.83
Turkoid & Turkgo	4PM-5PM	\$1.37	\$1.05	7AM-4PM	\$1.17	\$0.79	10PM-7AM	\$0.94	\$0.83
Turkole	6AM-12PM	\$2.70	\$1.30	12PM-11PM	\$2.03	\$1.03	3PM-6AM	\$1.61	\$0.83
Turk & Entone Isls	6AM-5PM	\$1.47	\$0.90	3PM-11PM	\$1.09	\$0.74	11PM-6AM	\$0.88	\$0.39
Turkey	7AM-1PM	\$2.22	\$1.24	1PM-6PM	\$1.66	\$0.93	6PM-7AM	\$1.22	\$0.74
Uganda	1PM-2AM	\$2.30	\$1.32	7AM-1PM	\$1.94	\$0.90	3AM-7AM	\$1.94	\$0.79
United Arab Emirates	6AM-3PM	\$2.70	\$0.97	9PM-6AM	\$2.02	\$0.72	3PM-9PM	\$1.94	\$0.88
United Kingdom	7AM-1PM	\$1.99	\$0.83	1PM-6PM	\$1.64	\$0.63	6PM-7AM	\$0.90	\$0.39
Uruguay	4PM-12AM	\$2.30	\$1.30	7AM-4PM	\$1.94	\$0.83	12AM-7AM	\$1.35	\$0.64
Vatican City	7AM-1PM	\$1.63	\$0.98	1PM-6PM	\$1.23	\$0.60	6PM-7AM	\$0.83	\$0.64
Venezuela	6AM-6PM	\$1.03	\$0.77	6PM-12AM	\$1.20	\$0.59	12AM-6PM	\$1.29	\$0.35
West Germany	7AM-1PM	\$1.63	\$0.98	1PM-6PM	\$1.23	\$0.60	6PM-7AM	\$1.13	\$0.64
Yemen Arab Republic	6AM-3PM	\$1.43	\$1.24	9PM-6AM	\$2.30	\$0.93	3PM-9PM	\$2.07	\$0.74
Yugoslavia	1PM-2AM	\$2.22	\$1.24	7AM-1PM	\$1.66	\$0.93	3AM-7AM	\$1.22	\$0.74
Zaire	6AM-12PM	\$2.70	\$1.30	12PM-11PM	\$2.03	\$1.03	3PM-6AM	\$1.61	\$0.83
Zambia	6AM-12PM	\$2.30	\$1.32	12PM-11PM	\$1.94	\$0.90	3PM-6AM	\$1.34	\$0.79
Zimbabwe	6AM-12PM	\$2.30	\$1.32	12PM-11PM	\$1.94	\$0.90	3PM-6AM	\$1.34	\$0.79
Malta	7AM-7PM	Mon-Fri	\$1.01	\$1.30	7PM-7AM		Mon-Fri	\$1.23	\$1.02
	3PM-12PM	Sat, Sun	\$1.01	\$1.30	12PM-3PM		Sat, Sun	\$1.25	\$1.02

EXHIBIT _____
(MJD - 9)

DISCOUNT LONG DISTANCE SERVICE DESIGNATION CARD

TELUS

Yes, I want to designate Telus Communications, Inc. as my "Main Long Distance Carrier" and authorize them to act as my agent and make arrangements with my local phone company to make the connections necessary so that long distance calls will be automatically routed to Telus. I understand that when service begins, I will not have to dial any extra digits to use my Telus service.

Signature [Signature] Date 8/14

Customer # TELECOM SVCS

Conversion Date _____

Index Number _____

Rep. [Signature]

MSO 1974M 5/89 rev.

Please fill out information below

Name/Title MR ELENA MARIA

Company _____

Address 1925 BRICKELL AVE

City APT N D-408 MIAMI

State FL Zip 33129

Telephone 305-756-5221

Please list telephone numbers to be connected to Telus 'One Plus' Dialing Service.

856-5221.

EXHIBIT _____
(MJD - 10)

ATC

Advanced Telecommunications Corporation

EXHIBIT

TO: JOEL TSI

TSI # 10 8/24/90
MG

FROM: Circuit Provisioning

PHONE: 407-750-2700

FAX: 407-750-2733

DATE: 1/12/90

THIS FAX INCLUDES COVER + 1 PAGES

COMMENTS:



Jan. 12, 1990

Telecommunication Services Inc.
14003 S.W. 104th St
Suite 1400
Miami, FL 33196

Dear Joel,

This is to confirm our conversation of Jan. 11, 1990. T.S.I. will mail \$11,017.98 on Jan. 11, 1990 to pay in full the first invoice covering the period from July to Oct. This payment is due in full on Jan. 12, 1990 according to the terms and agreements in the contract. The payment of 50% for the invoice covering the period of Nov. 1989 was due Jan 11. In the amount of \$7,771.00 and the balance of \$7,771.02 is due on Jan 29, 1990. Arrangements made during our conversation on Jan 11th indicate that you will mail the first payment on Jan 19, 1990 and the balance on Jan 26, 1990.

Failure to meet these arrangement will result in the suspension of service as described in the contract. In accordance to the contract if the payment of \$11,017.98 is not received by Jan. 22, 1990 the services will be suspended.

As discussed yesterday, please drop off the copies of the bills for your customers billed through TELUS so that I can make the necessary adjustments and you can make the necessary payment on these accounts.

If I can be of any assistance please call me at 407-750-2720.

Sincerely,

Mary Jo Daurio

Mary Jo Daurio

EXHIBIT _____
(MJD - 11)



**ADVANCED TELECOMMUNICATIONS
CORPORATION**

May 2, 1990

EXHIBIT

TSI 411

3/24/90
MC

T.S.I., Inc.
14869 SW 104th Street
Suite 1400
Miami, FL 33196

Dear Joel,

Per the contract signed between our companies payment for the bill is due at 50% within 15 days and the balance in 30 days. For the past several months this agreement has not been kept. Currently the entire February invoice in the amount of 24,559.38 is due today and 50% of the March invoice in the amount of \$15,350.37 was due on April 27, 1990.

Per Dennis Sickle these payment arrangements must be kept in order to continue service. Please remit immediately a check in the amount of \$39,909.75 if payment is not received by May 18, 1990 service could be discontinued. The remaining balance of \$13,350.37 is due by May 12, 1990.

If you require any additional information please call me at 407-750 2720.

Sincerely,

Mary Jo Daurio

EXHIBIT _____
(MJD - 12)



1515 South Federal Highway
 Suite 400
 Boca Raton, FL 33432-7404
 (407) 392-2244

*paid 7/16/90
 Check # 1104*

July 12, 1990

EXHIBIT

T.S.I.
 14869 S.W. 104th Street
 Suite 1400
 Miami, Florida 33196

TSI # 12 ^{8/24/94} _{MC}

Dear Joel:

Please contact me immediately regarding payment of the April invoice in the amount of \$31,055.60, which was due on July 6, 1990. Also, payment of \$1,889.16 for the accounts billed by TELUS is seriously overdue. In addition to the April invoice, the May invoice is due on July 14, 1990.

It is necessary for you to abide by the terms of the contract, which state that 50% of the invoice is due 15 days after it is rendered and the balance in another 15 days. Since December, you have not adhered to the contract. Failure to adhere to the contract could result in loss of service.

On the matter of the \$1,889.96, this issue has been open since February and you have continually promised to send this payment. Since our first discussion on this problem, I have arranged for a total of \$3,746.10 in adjustments to these accounts, and you have failed to remit your portion.

Please remit the April invoice immediately, and see that payment for the May invoice is remitted by July 14. If you disagree with these amounts, please contact me immediately to avoid any interruption in your service.

Sincerely,

Mary Jo Daurio

Mary Jo Daurio
 Manager of Order Administration

MJD/pr

paid 1108.62

(\$ 50713.19)

EXHIBIT _____
(MJD - 13)

EXHIBIT

TSI • 13 ^{8/24/94} MO

MARCH 13, 1991

JOEL ESQUENAZI

MARY JO DAVOLO ATC 407-750-2720, 407-750-2733 (FAX)

JOEL,

Please sign if you concur and
fax back asap

Thanks

Mary Jo

/

USAGE	AMOUNT DUE	PAYMENT	CREDIT	BAL
10/89	11,017.98	11,017.98 #1008 7/1/90	—	∅
11/89	15,542.02	7,771.00 #1011 7/1/91	—	7,771.02
12/89	16,778.95	23,750.20 #1020 7/1/90	799.77	∅
1/90	22,607.86	19,865.92 #1050 7/20/90	2741.94	∅
2/90	24,559.38	20,875.47 #1056 5/1/90	3,683.91	∅
3/90	30,700.74	24,334.27 #1077 4/17	6,366.47	∅
4/90	31,055.60		6,665.33	24,391.27
5/90	33,228.03	48,805.37 #1106 7/1	6,000.00	2812.93
6/90	35,878.00	35,532.85 #1206 7/11/95 7/1	3158.08	∅
7/90	35,773.63	71,547.30 #1240 1/2/91 7/15	—	(35,773.65)
8/90	41,672.90		—	5897.25
9/90	40,443.71		—	46,340.96
10/90	53,974.35		—	100,315.31
11/90	41,738.40		—	142,053.71
12/90	43,037.86		—	185,091.57
1/91	48,032.36		—	233,123.93
2/91	42,890.44	90000.00 1/8	21,581.73	164,432.64

~~56,730.34 25,500.00 50,999.33 = 162,482.64~~

<u>USAGE</u>	<u>AMOUNT DUE</u>	<u>PAYMENT</u>	<u>CREDIT</u>	<u>BALANCE</u>
10/89	\$11,017.98	\$11,017.98	-	0
11/89	\$15,542.02	\$ 7,771.00	-	\$ 7,771.02
12/89	\$16,778.95	\$23,750.20	\$ 799.77	0
1/90	\$22,607.86	\$19,865.92	\$ 2,741.94	0
2/90	\$24,559.38	\$20,875.47	\$ 3,683.91	0
3/90	\$30,700.74	\$24,334.27	\$ 6,366.47	0
4/90	\$31,055.60	-	\$ 6,665.33	\$ 24,390.27
5/90	\$33,228.03	\$48,805.37	\$ 6,000.00	\$ 2,812.93
6/90	\$35,878.00	\$35,532.85	\$ 3,158.08	0
7/90	\$38,773.65	\$71,547.30	-	(35,773.65)
8/90	\$41,670.90	-	-	\$ 5,897.25
9/90	\$40,443.71	-	-	\$ 46,340.96
10/90	\$53,974.35	-	-	\$100,315.31
11/90	\$41,738.40	-	-	\$142,053.71
12/90	\$43,037.86	-	-	\$185,091.57
1/91	\$48,032.36	-	-	\$233,123.93
2/91	\$43,622.15	\$90,000.00	\$21,581.73	\$165,164.35
2/91	\$47,321.15	\$90,000.00		\$171,485.50

ATC
 RECONCILIATION OF TSI AND NETWORK SOLUTIONS
 FEBRUARY 11, 1991

TSI

USAGE BILLED	AMOUNT DUE	AMOUNT PAID	CHECK NO.	DATE PAID	diff
10/89	11,017.98	11,071.98	1008 ✓	01/11/90	
11/89	15,542.02	7,771.00	1011 ✓	01/19/90	
12/89	16,778.95	23,750.20	1020 ✓	02/13/90	
01/90	22,607.86	19,865.92	1050 ✓	04/20/90	2741.94
02/90	24,559.38	20,875.47	1056 ✓	05/03/90	3683.91
03/90	30,700.74	24,334.27	1077 ✓	06/17/90	6366.47
04/90	31,055.60				
05/90	33,228.03	48,805.37	1106 ✓	07/16/90	2709.41
06/90	35,878.00	35,532.85	1206/1195 ✓	10/01/90	4155.49
07/90	35,773.65	71,547.30	1240/1214 ✓	10/05/90	
08/90	41,670.90	50,000.00	1023 ✓	01-18-91	
09/90	40,443.71	10,000.00	1044 ✓	01-29-91	
10/90	53,974.35				
11/90	41,738.40				
12/90	43,037.86				
01/91	48,032.36				
2/91	42,890.44				

208
 33
 178

208,897.58

w/ mail 30K by 3/8 + 30K in 2 weeks & every 2 weeks

Send check for 30K 3/7 will fix pymt schedule for 178K but 3/8

4 format for tape layout on call needs 8 48

EXHIBIT _____
(MJD - 14)



1515 South Federal Highway
Suite 200
Boca Raton, FL 33432-7404
(407) 392-2244

EXHIBIT

TSI # 14 8/24/94 MO

June 17, 1991

Telecommunications Services, Inc.
12221 S.W. 129th Ct.
Suite 200
Miami, Florida 33186

Dear Mr. Esquenazi:

Currently your account is past due. The previous payment schedule agreed upon by us has not be completed. As of today, the back balance is \$20,166.36 which was due May 20, 1991. With the April invoice of \$62,157.08, the total now due is \$82,323.44. This amount must be received by June 21st to avoid interruption of service.

If you have any questions, please call me at 407-750-2720.

Sincerely,

MARY JO DAURIO
MANAGER
ORDER ADMINISTRATION

EXHIBIT _____
(MJD - 15)



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

EXHIBIT

8/21/94
FSL # 15 Mo

July 29, 1991

Mr. Joel Esquenazi
Telecommunication Services, Inc.
12221 S.W. 129 Court, Suite 200
Miami, Florida 33186

Dear Mr. Esquenazi:

Thank you for your payment of \$32,593.66 which represents 50% of May's usage.

According to the terms of the contract, \$32,264.45, the balance of May is due on August 1. On August 2, \$32,593.66, 50% of June's invoice is due, and the balance on August 17.

Please have these payments mailed to me in Boca, or drop them off at our Miami location. Payments on the due date will avoid any interruption of service.

If you have any questions regarding this, please contact me at (407) 750-2720.

Sincerely,

Mary Jo Daurio

MJD/pr



**ADVANCED TELECOMMUNICATIONS
CORPORATION**

Dec. 27, 1989

Telecommunication Services Inc.
14869 S. W. 104th St
Suite 1400
Miami, FL 33196

Dear Joel,

Attached you will find the statement for services for the period Nov 1, 1989 thru Nov. 30, 1989. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

Payment should be made to Telus Communications, Inc and mailed to my attention to: 1515 S Federal Hwy
4th Floor-Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at 407-750-2720

Sincerely,

Mary Jo Daurio

TELECOM SERVICES
PERIOD 11/01/89 THRU 11/30/89

CATEGORY	DAY		EVENING		NIGHT WEEKEND		COST	AMT DUE
	CALLS	MINUTES	CALLS	MINUTES	CALLS	MINUTES		
INTERN'L	1,462	4,740.1	1,330	4,140.0	50	331.7		7,673.60
TRVL SVC	0	.0	1	1.0	0	.0	.195	.19
INB 800	526	1,683.0	53	133.0	22	50.0	.21	391.86
INTRALATA	1,726	5,014.5	159	606.1	103	243.5	.12	703.69
INTRASTATE	1,697	5,083.2	79	376.5	44	205.8	.125	708.18
DN NET	8,628	25,833.3	530	2,381.7	300	1,639.3	.14	4,179.60
OFF NET	3,627	11,144.3	308	1,071.0	150	350.7	.15	1,884.90
TOTALS	17,666	53,498.4	2,460	8,709.3	669	2,821.0		15,542.02

AMOUNT DUE

\$ 15,542.02

- 3%⁰⁴

466.26

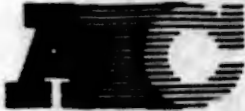
1000 - 12% Gsec Billing - 47.02

\$ 15,028.74
 330.53

OCT INVOICE ADJUSTMENT

\$ 14,698.21

EXHIBIT _____
(MJD - 16)



ADVANCED TELECOMMUNICATIONS
CORPORATION

EXHIBIT

COMPOS 8/24/94
TSI # 16 MG

December 12, 1989

Telecommunication Services, Inc.
14869 S. W. 104th Street
Suite 1400
Miami, FL 33196

Dear Joel:

Attached you will find the statement for services for the period July 10, 1989, through October 31, 1989. According to your agreement with TELUS, 50% is due in fifteen days and the balance in thirty days.

Payment should be made to Advanced Telecommunications Corp. and mailed to my attention at : 1515 S. Federal Hwy.
4th Floor, Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at 407-750-2720.

Sincerely,

Mary Jo Daurio

TELECOM SERVICES
PERIOD 07/10/89 THRU 10/31/89

CATEGORY	DAY		EVENING		NIGHT/WEEKEND		COST	AMT DUE
	CALLS	MINUTES	CALLS	MINUTES	CALLS	MINUTES		
INTERN'L	1,223	4,144.7	911	3,054.8	34	438.8		6,723.53
TRVL SVC	0	.0	0	.0	0	.0	.195	
INB 800	0	.0	0	.0	0	.0	.21	
INTRALATA	1,906	5,037.1	189	351.9	108	437.4	.12	699.17
INTRASTATE	1,019	3,214.2	39	153.0	26	118.5	.125	441.72
DN NET	5,787	18,089.3	0	.0	0	.0	.14	2,532.50
OFF NET	0	.0	720	1,790.9	31	82.8	.15	281.06
TOTALS	12,206	37,224.2	2,876	8,182.9	302	1,708.8		10,677.98

DIALER INSTALLATION \$10.00 PER LINE:

14 DIALERS/34 LINES

340.00

AMOUNT DUE

\$ 11,017.98

Paid 11/11/90
Check # 1008
 $11,017.98 \times 3\% = 330.54$
 $11,017.98 - 330.54 = 10,687.44$



ADVANCED TELECOMMUNICATIONS
CORPORATION

January 17, 1990

Telecommunication Services Inc.
14869 S.W. 104th Street
Suite 1400
Miami, FL 33196

Dear Joel,

Attached you will find the statement for services for the period December 1, 1989 thru December 31, 1989. According to your agreement with TELUS 50% is due in fifteen days and the balance is thirty days.

Your account is currently past due. According to our records \$18,789.03 is now past due. In addition \$7,771.00 is due January 27, 1990. This new invoice is due February 1, 1990 (\$8,389.47) and February 17, 1990 (\$8,389.48).

Payment should be made to ATC and mailed to my attention to:

1515 S. Federal Highway
4th floor, Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at

407-750-2720.

Sincerely,

A handwritten signature in cursive script that reads "Mary Jo Daurio".

Mary Jo Daurio

TELECOM SERVICES INC.
 PERIOD 12/01/89 THRU 12/31/89

CATEGORY	DAY		EVENING		NIGHT/WEEKEND		COST	AMT DUE
	CALLS	MINUTES	CALLS	MINUTES	CALLS	MINUTES		
INTERN'L	1,527	4,678.4	1,058	3,615.9	96	305.3	.	62697.57
TRVL SVC	46	211.0	21	147.0	20	109.0	.195	91.07
INS 300	611	1,612.0	60	128.0	51	98.0	.21	385.98
INTRALATA	1,827	5,004.1	231	684.2	177	621.3	.12	781.22
INTRASTATE	2,096	6,052.8	207	954.8	145	923.7	.125	991.41
ON NET	9,870	30,312.5	777	4,153.0	688	3,563.7	.14	5,324.08
OFF NET	4,993	14,453.4	282	1,087.3	383	1,176.8	.15	2,507.62
TOTALS	20,970	62,324.2	2,636	10,770.8	1,540	6,997.8		16,778.95

AMOUNT DUE

\$ 16,778.95



ADVANCED TELECOMMUNICATIONS CORPORATION

February 13, 1990

Telecommunication Services, Inc.
14869 S.W. 104th Street
Suite 1400
Miami, FL 33196

paid
4/20/90
check # 1050
paid \$ 1,865.92
2741.30

Dear Joel,

Attached you will find the statement for services for the period Jan. 1, 1990 thru Jan. 31, 1990. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

Your account is currently past due. According to our records \$24,549.95 is now past due. Per our conversation today you will be mailing that full amount on Feb. 14th.

Payment should be made to ATC and mailed to my attention to:

1515 S. Federal Highway
4th Floor Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at 407-750-2720.

Sincerely,

Mary Jo Daurio

Mary Jo Daurio

TELECOM SERVICES
PERIOD 01/01/90 THRU 01/31/90

CATEGORY	DAY		EVENING		NIGHT/WEEKEND		COST	AMT DUE
	CALLS	MINUTES	CALLS	MINUTES	CALLS	MINUTES		
INTERN'L	1,868	8,094.2	1,228	4,189.5	128	426.5		8,674.14
TRVL SVC	41	180.0	23	211.0	34	510.0	.195	175.70
INB 800	955	2,552.0	68	190.0	117	260.0	.21	830.42
INTRALATA	2,126	5,726.1	332	965.4	366	1,266.3	.12	954.93
INTRASTATE	3,039	9,216.0	495	2,035.5	352	1,895.6	.125	1,643.39
ON NET	12,510	38,009.4	1,078	4,951.1	1,007	4,359.5	.14	8,624.80
OFF NET	7,379	21,191.8	612	2,378.8	730	2,459.3	.15	3,904.48
TOTALS	27,918	82,969.5	3,832	14,921.3	2,734	11,177.2		22,607.36

AMOUNT DUE

\$ 22,607.96

*payment → \$ 19,865.92
for this month. (6)*



**ADVANCED TELECOMMUNICATIONS
CORPORATION**

April 2, 1990

Telecommunication Services, Inc.
14869 S.W. 104th Street
Suite 1400
Miami, FL 33196

Dear Joel,

Attached you will find the statement for services for the period February 1, 1990 thru February 28, 1990. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

Your account is currently past due. According to our records \$22,607.86 is now past due. Per our conversation today you will be mailing one half of the amount today, April 2nd and the balance on April 9th.

Payment should be made to ATC and mailed to my attention to:

1515 S. Federal Highway
4th Floor, Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at 407-750-2720.

Sincerely,

Mary Jo Daurio

Mary Jo Daurio

TELECOM SERVICES
PERIOD 02/01/90 THRU 02/29/90

CATEGORY	DAY		EVENING		NIGHT/WEEKEND		COST	AMT DUE
	CALLS	MINUTES	CALLS	MINUTES	CALLS	MINUTES		
INTERN'L	1,986	5,749.0	1,197	3,935.7	94	363.0		9,295.27
TRVL SVC	49	294.0	35	319.0	34	683.0	.195	250377
INB 900	909	2,374.0	91	213.0	101	286.0	.21	603.33
INTRALATA	2,208	6,312.5	225	1,100.2	246	826.3	.12	989.68
INTRASTATE	3,902	10,996.3	375	1,772.7	225	1,330.5	.125	1,762.44
ON NET	14,774	45,289.0	1,117	5,428.2	490	2,818.8	.14	7,492.23
OFF NET	8,127	23,499.7	710	2,543.7	385	1,744.3	.15	4,166.56
TOTALS	31,833	95,474.5	3,931	15,312.6	1,575	8,051.9		24,559.38

AMOUNT DUE

* 24,559.38

- 3,123.91

20,975.47

*Paid
5/15/90
check # 1056.*

(OK)



ADVANCED TELECOMMUNICATIONS
CORPORATION

April 13, 1990

Telecommunication Services, Inc.
14869 SW 104th Street
Suite 1400
Miami, FL 33196

Dear Joel,

Attached you will find the statement for services for the period March 1, 1990 thru March 31, 1990 in the amount of \$30,700.74. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

Payment should be made to ATC and mailed to my attention to:

1515 S. Federal Highway
4th Floor, Room 4022
Boca Raton, FL 33432

If you have any questions, please feel free to call me at 407-750 2720.

Sincerely,

Mary Jo Daurio
Mary Jo Daurio

TELECOM SERVICES
 PERIOD 03/01/90 THRU 03/31/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	4,537	17,508.1		13,869.35
TRAVEL SVC	228	1,495.0	.195	291.53
INBOUND 800	367	910.0	.21	191.10
INTRALATA	3,834	10,533.4	.12	1,264.00
INTRASTATE	4,800	13,564.9	.125	1,695.61
ON NET	20,049	64,392.3	.14	9,014.92
OFF NET	10,258	29,181.5	.15	4,374.23
TOTALS	44,073	137,563.2		30,700.74

AMOUNT DUE \$ 30,700.74

*paid
 6/17/90
 check # 1077*

- 16% 4912.12

- 379.59

*EDUARDO -
 ORIZCO.*

- 880.69

*AMERICAN
 TRADING
 UNLIMITED*

*AMIGAMA
 TRADING.*

5.49

*MERCEDES
 ORIZCO*

188.18

(6)

TOTAL \$6,366.47
Deductions due 24,334.27



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

June 6, 1990

Telecommunication Services Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Joel,

Attached you will find the statement for services for the period April 1, 1990 thru April 30, 1990 in the amount of \$31,055.60. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

In addition our records indicate that we have not yet received payment on the March invoice in the amount of \$30,700.74. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention to:

1515 South Federal Hwy
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions please feel free to call me at (407) 750-2720.

Sincerely,

A handwritten signature in cursive script that reads 'Mary Jo Daurio'. The signature is written in dark ink and is positioned above the typed name.

Mary Jo Daurio

TELECOM SERVICES
PERIOD 04/01/90 THRU 04/30/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	4,702	17,443.9		14,262.37
TRAVEL SVC	201	1,429.0	.195	276.66
INBOUND 800	16	122.0	.21	25.62
INTRALATA	4,129	11,156.0	.12	1,338.72
INTRASTATE	4,040	12,089.7	.125	1,511.21
CN NET	19,312	59,818.8	.14	8,374.60
OFF NET	19,682	35,096.1	.15	5,264.42
				16,793.27
TOTALS	46,082	137,155.3		31,055.60

AMOUNT DUE

\$ 31,055.60

~~orig 21,920.60~~

5590.
 3545.

 9135.
 207.

4658.34 (15%)

 \$ 26,397.26 due
 2352.10 - COMD

 \$ 24,035.16



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

June 15, 1990

Telecommunications Services Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Joel,

Attached you will find the statement for services for the period May 1, 1990 thru May 31, 1990 in the amount of \$33,228.03. According to your agreement with TELUS 50% is due in fifteen days and the balance in thirty days.

In addition our records indicate that we have not yet received payment on the March invoice in the amount of \$30,700.74. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention to:

1515 South Federal Hwy
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions please feel free to call me at (407) 750-2720.

Sincerely,

A handwritten signature in cursive script that reads 'Mary Jo Daurio'.

Mary Jo Daurio

TELECOM SERVICES
PERIOD 05/01/90 THRU 05/31/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	6,042	22,128.9		17,131.30
TRAVEL SVC	185	1,295.0	.195	252.53
INBOUND 800	3,275	9,508.0	.21	1,996.68
INTRALATA	3,483	10,254.3	.12	1,230.52
INTRASTATE	3,841	12,082.8	.125	1,510.35
ON NET	15,704	55,417.1	.14	7,758.39
OFF NET	6,861	22,321.7	.15	3,348.26
TOTALS	39,371	133,005.8		33,228.03

AMOUNT DUE

• 31,055.60

~~5279.45~~
7451.48

paid 25,776.15

41,574.22

4984.20 -
 28243.83 due
 1565.80 -
 26678.03



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

Handwritten:
Paid Check
1195
10/1/90.

July 9, 1990

Telecommunications Services, Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Joel:

Attached you will find the statement for services for the period June 1, 1990 thru June 30, 1990 in the amount of \$33,228.03.

According to your agreement with TELUS, 50% is due in fifteen days and the balance in thirty days.

In addition, our records indicate that we have not yet received payment on the April invoice in the amount of \$31,055.64. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention at:

1515 South Federal Highway
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions, please feel free to call me at (407) 750-2720.

Sincerely,

Handwritten signature: Mary Jo Daurio

Mary Jo Daurio

MJD/pr

Attachment

TELEPHONE SERVICE
 MONTHLY STATEMENT

CATEGORY	CALLS	MINUTES	RATE	AMOUNT
INTERNATIONAL	1,234	18,234.5		21,098.50
TRAVEL SVC	123	1,234.0	.125	154.25
INBOUND SVC	1,234	1,234.0	.125	154.25
INTRA-LATA	1,234	1,234.0	.125	154.25
INTERSTATE	1,234	1,234.0	.125	154.25
EX NET	1,234	1,234.0	.125	154.25
OFF NET	1,234	1,234.0	.125	154.25

TOTALS 49,234 117,340.0 35,497.17 = 34,722.5

AMOUNT DUE \$ 31,055.80

35,878. ← due
 2,000. Separate.

5774.56

OK



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

August 17, 1990

Telecommunications Services, Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Jeal:

Attached you will find the statement for services for the period July 1, 1990 thru July 31, 1990 in the amount of \$38,773.68.

According to your agreement with TELUS, 50% is due in fifteen days and the balance in thirty days.

In addition, our records indicate that we have not yet received payment on the June invoice in the amount of \$38,878.07. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention at:

1515 South Federal Highway
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions, please feel free to call me at (407) 750-2720.

Sincerely,

Mary Jo Daurio
Mary Jo Daurio

MJD/pr

Attachment

*PAID.
Check # 1214
TOTAL
Amount.*

TELECOM SERVICES
PERIOD 07/01/90 THRU 07/31/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	6,923	26,072.3		20,486.02
TRAVEL SVC	72	359.0	.19	68.21
	147	2,117.0	.16	336.72
INBOUND 800	2,145	5,036.0	.21	1,057.96
INTRALATA	4,240	11,493.2	.12	1,379.18
INTRASTATE	5,364	14,909.3	.125	1,863.66
ON NET	18,536	71,822.3	.14	10,055.12
OFF NET	6,658	21,483.8	.15	3,222.57

TOTAL DOMESTIC CALLS	17,965.44
-15%	- 2,697.61

TOTAL DOMESTIC	15,267.83
TOTAL INTERNATIONAL	20,486.02

TOTAL AMOUNT DUE	35,773.65
------------------	-----------

60



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

September 26, 1990

Telecommunications Services, Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Joel:

Attached you will find the statement for services for the period August 1, 1990 thru August 31, 1990 in the amount of \$41,670.90.

According to your agreement with TELUS, 50% is due in fifteen days and the balance in thirty days.

In addition, our records indicate that we have not yet received payment on the June and July invoices in the amount of \$75,651.65. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention at:

1515 South Federal Highway
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions, please feel free to call me at (407) 750-2720.

Sincerely,

Mary Jo Daurio

Mary Jo Daurio

MJD/pr

Attachment

*Paid
check # 1240
\$35,773.65*

TELECOM SERVICES
PERIOD 07/01/90 THRU 07/31/90

8/1/90 8/31/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	8,075	31,805.8		23,942.73
TRAVEL SVC	63	289.0	.18	51.11
	107	1,459.0	.18	233.44
INBOUND 800	4,595	18,495.0	.21	3,853.95
INTRALATA	4,934	13,270.7	.12	1,592.48
INTRASTATE	8,981	17,979.8	.125	2,247.47
ON NET	17,288	70,050.7	.14	9,807.09
OFF NET	12,104	20,274.8	.15	3,041.10

TOTAL DOMESTIC CALLS 20,858.64
-155 - 3,128.50

TOTAL DOMESTIC 17,728.14
TOTAL INTERNATIONAL 23,942.78

TOTAL AMOUNT DUE 41,670.90

CK

CK



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-8043 (customers within FL & GA)
 1-800-432-8043 Ext. 9 (customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100090102
 INVOICE DATE: 10/07/90
 SERVICE PERIOD:
 09/01/90 - 09/30/90

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS. TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	8,086	33,824.1		25,137.40
TRAVEL SERVICE	24	97.0	.1900	18.43
INBOUND 800	3,017	12,941.0	.2100	2,717.61
INTRALATA	3,612	9,196.2	.1200	1,103.54
INTRASTATE	4,075	11,484.7	.1250	1,435.59
INTERSTATE ON NET	12,446	47,401.4	.1400	6,636.20
INTERSTATE OFF NET	4,728	14,122.5	.1500	2,118.78
SUBTOTAL	35,988	129,066.9		39,167.15
EVENING USAGE:				
TRAVEL SERVICE	21	161.0	.1600	25.76
INBOUND 800	378	1,171.0	.2100	245.91
INTRALATA	428	1,352.2	.1200	162.26
INTRASTATE	507	2,333.9	.1250	291.74
INTERSTATE ON NET	2026	10,361.9	.1400	1,450.67
INTERSTATE OFF NET	413	2,453.8	.1500	368.07
SUBTOTAL	3,773	17,833.8		2,544.41
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	26	201.0	.1600	32.16
INBOUND 800	231	428.0	.2100	89.88
INTRALATA	376	1,197.4	.1200	143.69
INTRASTATE	174	850.1	.1250	106.26
INTERSTATE ON NET	1139	7,854.5	.1400	344.61
INTERSTATE OFF NET	386	1,669.2	.1500	716.63
SUBTOTAL	2,332	12,200.2		1,433.26
CURRENT BALANCE				43,144.82
CREDIT 15% DOMESTIC USAGE				(2,701.11)
PREVIOUS BALANCE				90,213.40
PAYMENT - THANK YOU				(12,768.85)
TOTAL AMOUNT DUE				117,888.26

(d)

CURRENT TOTAL DUE →



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100111702
 INVOICE DATE: 11/17/90
 SERVICE PERIOD:
 10/01/90 - 10/31/90

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS. TOTAL AMOUNT

CATEGORY:

DAY USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
INTERNATIONAL	10.468	42.943.6		32.494.70
TRAVEL SERVICE	111	550.0	.1900 - <i>ef</i>	104.50
INBOUND 800	3.639	15.831.0	.2100	3.324.51
INTRALATA	5.183	13.096.9	.1200	1.571.63
INTRASTATE	5.176	14.364.6	.1250	1.795.58
INTERSTATE ON NET	19.312	68.701.1	.1400	9.618.15
INTERSTATE OFF NET	8.548	25.762.2	.1500	3.864.33
SUBTOTAL	52.437	181.249.4		52.773.40
EVENING USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
TRAVEL SERVICE	82	659.0	.1600	105.44
INBOUND 800	434	1.434.0	.2100	301.14
INTRALATA	759	2.245.2	.1200 -	269.42
INTRASTATE	613	2.523.5	.1250 -	315.44
INTERSTATE ON NET	2761	15.110.5	.1400	2.115.47
INTERSTATE OFF NET	621	3.692.8	.1500	553.92
SUBTOTAL	5.270	25.665.0		3.660.83
NIGHT/WEEKEND USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
TRAVEL SERVICE	49	353.0	.1600	56.48
INBOUND 800	182	282.0	.2100	59.22
INTRALATA	275	754.4	.1200	90.53
INTRASTATE	220	915.6	.1250	114.45
INTERSTATE ON NET	1219	9.304.2	.1400	344.64
INTERSTATE OFF NET	443	2.670.8	.1500	665.32
SUBTOTAL	2.388	14.280.0		1.330.64
CURRENT BALANCE				57.764.87
CREDIT 15% DOMESTIC USAGE				(3.790.52)
PREVIOUS BALANCE				57,974.35
PAYMENT - THANK YOU				117,888.26
TOTAL AMOUNT DUE ----->				(35,773.65)
				136,088.96



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-228-5040

ATC
 REMIT TO:
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100011902
 INVOICE DATE: 01/10/91
 SERVICE PERIOD:
 11/01/90 - 11/30/90

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS. TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	8,643	35,206.9		26,305.67
TRAVEL SERVICE	190	608.0	.1900	115.52
INBOUND 800	1,472	5,513.0	.2100	1,157.72
INTRALATA	3,798	10,160.0	.1200	1,219.20
INTRASTATE	3,732	10,962.5	.1250	1,370.31
INTERSTATE ON NET	15,070	50,366.0	.1400	7,051.24
INTERSTATE OFF NET	5,293	16,485.7	.1500	2,472.86
SUBTOTAL	38,198	129,302.1		39,692.53
EVENING USAGE:				
TRAVEL SERVICE	119	714.0	.1600	114.24
INBOUND 800	96	265.0	.2100	55.65
INTRALATA	611	1,795.8	.1200	215.50
INTRASTATE	505	1,694.3	.1250	211.79
INTERSTATE ON NET	2785	14,906.2	.1400	2,086.87
INTERSTATE OFF NET	494	2,913.2	.1500	436.98
SUBTOTAL	4,610	22,288.5		3,121.03
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	85	516.0	.1600	82.56
INBOUND 800	55	135.0	.2100	28.35
INTRALATA	254	649.8	.1200	77.98
INTRASTATE	101	514.8	.1250	64.35
INTERSTATE ON NET	1,085	8,114.7	.1400	1,136.06
INTERSTATE OFF NET	234	1,726.4	.1500	258.96
SUBTOTAL	1,814	11,656.7		1,648.26
CREDIT 15% DOMESTIC USAGE				(2,723.42)
CURRENT BALANCE				41,738.40
PREVIOUS BALANCE				136,088.96
TOTAL AMOUNT DUE				177,827.36



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

ATC REMIT TO:
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100011902
 INVOICE DATE: 01/17/91
 SERVICE PERIOD:
 12/01/90 - 12/31/90

TELECOMMUNICATION SERVICES INC.
 10221 S.W. 129TH COURT
 SUITE 200
 MIAMI FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS.

TOTAL AMOUNT

DAY USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
INTERNATIONAL	7,657	30,551.8		28,305.67
TRAVEL SERVICE	302	1,208.0	.1900	229.52
INBOUND 800	1,571	5,695.0	.2100	1,195.95
INTRALATA	4,357	11,609.7	.1200	1,393.16
INTRASTATE	4,180	11,432.9	.1250	1,429.11
INTERSTATE ON NET	16,759	53,940.2	.1400	7,551.03
INTERSTATE OFF NET	5,986	19,482.6	.1500	2,922.39
SUBTOTAL	40,812	133,920.2		41,027.43

EVENING USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
TRAVEL SERVICE	128	729.0	.1600	116.64
INBOUND 800	82	278.0	.2100	58.38
INTRALATA	674	2,126.2	.1200	255.14
INTRASTATE	393	1,721.1	.1250	215.14
INTERSTATE ON NET	2922	15,136.7	.1400	2,119.14
INTERSTATE OFF NET	559	3,146.2	.1500	471.93
SUBTOTAL	4,758	23,137.2		3,236.37

NIGHT/WEEKEND USAGE:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
TRAVEL SERVICE	164	748.0	.1600	119.68
INBOUND 800	46	92.0	.2100	19.32
INTRALATA	300	833.9	.1200	100.07
INTRASTATE	143	588.5	.1250	73.56
INTERSTATE ON NET	1,185	7,387.1	.1400	1,034.19
INTERSTATE OFF NET	306	2,533.2	.1500	379.98
SUBTOTAL	2,144	12,182.7		1,726.80

CREDIT 15% DOMESTIC USAGE (2,952.74)

CURRENT BALANCE 43,037.86

PREVIOUS BALANCE 177,827.36

TOTAL AMOUNT DUE -----> 220,865.22



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 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100011902
 INVOICE DATE: 02/11/91
 SERVICE PERIOD:
 01/15/91 - 01/31/91

TELECOMMUNICATIONS SERVICES INC.
 1501 S.W. 109TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS. **TOTAL AMOUNT**

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	8,435	33,563.4		23,009.39
TRAVEL SERVICE	278	1,157.0	.1900	219.25
INBOUND 800	1,387	3,401.0	.2100	1,134.21
INTRALATA	3,387	14,438.4	.1200	1,772.61
INTRASTATE	6,089	18,179.2	.1250	2,272.40
INTERSTATE ON NET	21,193	70,058.4	.1400	9,808.18
INTERSTATE OFF NET	8,956	28,384.1	.1500	4,257.62
SUBTOTAL	31,745	171,181.5		44,474.24
EVENING USAGE:				
TRAVEL SERVICE	184	903.0	.1600	144.48
INBOUND 800	69	275.0	.2100	57.75
INTRALATA	632	1,985.5	.1200	238.26
INTRASTATE	536	2,111.8	.1250	263.98
INTERSTATE ON NET	3658	21,748.4	.1400	3,044.78
INTERSTATE OFF NET	720	4,304.2	.1500	645.63
SUBTOTAL	5,799	31,327.9		4,394.88
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	196	1,216.0	.1600	194.56
INBOUND 800	71	215.0	.2100	45.15
INTRALATA	527	1,604.6	.1200	192.55
INTRASTATE	429	1,412.7	.1250	176.59
INTERSTATE ON NET	2,520	13,877.5	.1400	1,942.85
INTERSTATE OFF NET	937	4,762.8	.1500	714.42
SUBTOTAL	4,680	23,088.6		3,266.12
CREDIT 15% DOMESTIC USAGE				(4,062.88)
CURRENT BALANCE				18,038.55
PREVIOUS BALANCE				220,865.22
PAYMENT - THANK YOU				(60,000.00)
TOTAL AMOUNT DUE				208,897.58



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 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100011902
 INVOICE DATE: 07/27/91
 SERVICE PERIOD:
 02/01/91 - 02/28/91

TELECOMMUNICATION SERVICES INC.
 1515 S.W. 109TH COURT
 SUITE 400
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS. TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	7,893	30,016.7		22,616.81
TRAVEL SERVICE	287	1,172.0	.1900	222.68
INBOUND 800	1,281	5,071.0	.2100	1,064.91
INTRALATA	5,271	14,377.6	.1200	1,725.31
INTRASTATE	5,166	15,362.7	.1250	1,920.34
INTERSTATE ON NET	17,023	61,891.0	.1400	8,664.74
INTERSTATE OFF NET	7,598	24,203.2	.1500	3,630.48
SUBTOTAL	46,519	152,094.2		39,845.27
EVENING USAGE:				
TRAVEL SERVICE	228	1,229.0	.1600	196.64
INBOUND 800	79	369.0	.2100	77.49
INTRALATA	977	2,924.6	.1200	350.95
INTRASTATE	630	2,611.1	.1250	326.39
INTERSTATE ON NET	3,512	19,184.3	.1400	2,685.80
INTERSTATE OFF NET	753	4,351.7	.1500	652.76
SUBTOTAL	6,179	30,669.7		4,290.03
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	199	1,124.0	.1600	179.84
INBOUND 800	76	162.0	.2100	34.02
INTRALATA	643	1,696.6	.1200	203.59
INTRASTATE	465	1,680.1	.1250	210.01
INTERSTATE ON NET	2,785	14,081.5	.1400	1,971.41
INTERSTATE OFF NET	849	3,965.3	.1500	594.80
SUBTOTAL	5,017	22,709.5		3,193.67
CREDIT 15% DOMESTIC USAGE				(3,706.82)
CURRENT BALANCE				43,622.15
PREVIOUS BALANCE				208,897.58
TOTAL AMOUNT DUE ----->				252,519.73



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REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100910301
 INVOICE DATE: 04/05/91
 SERVICE PERIOD:
 03/01/91 - 03/31/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:

	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	8,506	30,815.1		<i>DR</i> 23,595.40
TRAVEL SERVICE	434	1,526.0	.1900	289.94
INBOUND 800	1,245	4,960.0	.2100	1,041.60
INTRALATA	7,202	18,449.5	.1200	2,213.94
INTRASTATE	6,663	19,418.7	.1250	2,427.34
INTERSTATE ON NET	23,342	73,770.3	.1400	10,327.84
INTERSTATE OFF NET	9,714	29,074.9	.1500	4,361.24
SUBTOTAL	57,106	178,014.5		44,257.30
EVENING USAGE:				
TRAVEL SERVICE	383	1,733.0	.1600	277.28
INBOUND 800	65	213.0	.2100	44.73
INTRALATA	1,373	3,984.1	.1200	478.09
INTRASTATE	632	2,442.3	.1250	305.29
INTERSTATE ON NET	4,604	22,177.2	.1400	3,104.81
INTERSTATE OFF NET	808	3,892.7	.1500	583.91
SUBTOTAL	7,865	34,442.3		4,794.11
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	356	1,760.0	.1600	281.60
INBOUND 800	31	62.0	.2100	13.02
INTRALATA	629	1,851.9	.1200	222.23
INTRASTATE	210	586.2	.1250	73.28
INTERSTATE ON NET	1,919	10,716.5	.1400	1,500.31
INTERSTATE OFF NET	363	2,441.3	.1500	366.20
SUBTOTAL	3,508	17,417.9		2,456.64
CREDIT 15% DOMESTIC USAGE				(4,186.90)
CURRENT BALANCE				47,321.15
PREVIOUS BALANCE				252,519.73
PAYMENT - THANK YOU				(30,000.00)
PAYMENT - THANK YOU				(35,000.00)
TOTAL AMOUNT DUE ----->				234,840.88



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 To Report Technical Difficulties 1-800-228-5040

ATC REMIT TO:
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 100910301
 INVOICE DATE: 05/15/91
 SERVICE PERIOD:
 04/01/91 - 04/30/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

paid

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS **TOTAL AMOUNT**

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	10,544	39,072.6		30,839.48
TRAVEL SERVICE	295	1,352.0	.1900	256.88
INBOUND 800	3,277	12,867.0	.2100	2,702.07
INTRALATA	7,384	19,185.0	.1200	2,302.20
INTRASTATE	9,573	24,810.0	.1250	3,101.25
INTERSTATE ON NET	27,431	86,450.4	.1400	12,103.06
INTERSTATE OFF NET	17,043	48,531.5	.1500	7,279.73
SUBTOTAL	75,547	232,268.5		58,584.67
EVENING USAGE:				
TRAVEL SERVICE	208	1,192.0	.1600	190.72
INBOUND 800	476	1,619.0	.2100	339.99
INTRALATA	1,276	3,711.7	.1200	445.40
INTRASTATE	884	3,453.6	.1250	431.70
INTERSTATE ON NET	5,105	26,839.3	.1400	3,757.50
INTERSTATE OFF NET	1,931	7,668.0	.1500	1,150.20
SUBTOTAL	9,880	44,483.6		6,315.51
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	202	978.0	.1600	156.48
INBOUND 800	261	626.0	.2100	131.46
INTRALATA	424	1,206.2	.1200	144.74
INTRASTATE	291	962.8	.1250	120.35
INTERSTATE ON NET	1,664	10,325.0	.1400	1,445.50
INTERSTATE OFF NET	2360	5,233.3	.1500	785.00
SUBTOTAL	5,202	19,331.3		2,783.53
CREDIT 15% DOMESTIC USAGE				(5,526.63)
CURRENT BALANCE				82,157.08
PREVIOUS BALANCE				234,840.88
PAYMENT - THANK YOU				(87,321.15)
PAYMENT - THANK YOU				(37,890.44)
CREDIT 1 MINUTE - NO ANSWER CALLS (7 MONTHS)				(21,581.73)
CREDIT INTERNATIONAL (10/89 - 6/90)				(21,375.85)
CREDIT ADJUSTMENT TO BALANCE				(35,773.65)
TOTAL AMOUNT DUE ----->				93,055.14



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

PAID TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910701002
 INVOICE DATE: 07/01/91
 SERVICE PERIOD:
 05/01/91 - 05/31/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

paid in full

34,264.42

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	11,450	42,825.9		32,749.02
TRAVEL SERVICE	386	1,546.0	.1900	293.74
INBOUND 800	1,664	6,051.0	.2100	1,270.71
INTRALATA	6,169	16,504.3	.1200	1,980.52
INTRASTATE	7,706	21,360.4	.1250	2,670.05
INTERSTATE ON NET	28,868	93,980.5	.1400	13,157.27
INTERSTATE OFF NET	17,041	51,218.5	.1500	7,682.78
SUBTOTAL	73,284	233,486.6		59,804.09
EVENING USAGE:				
TRAVEL SERVICE	231	1,869.0	.1600	299.04
INBOUND 800	249	618.0	.2100	129.78
INTRALATA	1,195	3,586.7	.1200	430.40
INTRASTATE	853	3,402.9	.1250	425.36
INTERSTATE ON NET	7,120	34,571.4	.1400	4,840.00
INTERSTATE OFF NET	3,194	10,408.0	.1500	1,561.20
SUBTOTAL	12,842	54,456.0		7,685.78
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	159	905.0	.1600	144.80
INBOUND 800	112	187.0	.2100	39.27
INTRALATA	399	1,355.6	.1200	162.67
INTRASTATE	263	986.7	.1250	123.34
INTERSTATE ON NET	1,730	9,834.3	.1400	1,376.80
INTERSTATE OFF NET	2,517	5,335.8	.1500	800.37
SUBTOTAL	5,180	18,604.4		2,647.25
CREDIT 15% DOMESTIC USAGE				(5,608.22)
CURRENT BALANCE				64,528.90
PREVIOUS BALANCE				93,055.14
PAYMENT - THANK YOU				(40,000.00)
TOTAL AMOUNT DUE ----->				117,584.04



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 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
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 To Report Technical Difficulties 1-800-228-5040

REMIT TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910712001
 INVOICE DATE: 07/12/91
 SERVICE PERIOD:
 06/01/91 - 06/30/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

10928.31

5455266

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	11,146	44,661.0		33,247.91
TRAVEL SERVICE	407	1,997.0	.1900	379.43
INBOUND 800	2,171	6,589.0	.2100	1,383.69
INTRALATA	6,808	17,964.3	.1200	2,155.74
INTRASTATE	8,041	22,721.9	.1250	2,840.24
INTERSTATE ON NET	30,586	96,311.3	.1400	13,483.61
INTERSTATE OFF NET	13,349	41,705.6	.1500	6,255.84
SUBTOTAL	72,508	231,950.5		59,746.46
EVENING USAGE:				
TRAVEL SERVICE	264	2,091.0	.1600	334.56
INBOUND 800	285	807.0	.2100	169.47
INTRALATA	1,249	3,813.8	.1200	457.66
INTRASTATE	1,052	4,614.9	.1250	576.86
INTERSTATE ON NET	7,955	35,690.4	.1400	4,996.66
INTERSTATE OFF NET	1,433	6,554.9	.1500	983.24
SUBTOTAL	12,238	53,572.0		7,518.45
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	148	819.0	.1600	131.04
INBOUND 800	229	495.0	.2100	103.95
INTRALATA	581	1,883.5	.1200	226.02
INTRASTATE	288	1,359.7	.1250	169.96
INTERSTATE ON NET	3,134	17,010.6	.1400	2,381.48
INTERSTATE OFF NET	802	3,642.1	.1500	546.32
SUBTOTAL	5,182	25,209.9		3,558.77
CREDIT 15% DOMESTIC USAGE				(5,636.37)
CURRENT BALANCE				65,187.31
PREVIOUS BALANCE				117,584.04
PAYMENT - THANK YOU				(19,830.67)
CREDIT DOUBLE BILLING				(22,492.77)
TOTAL AMOUNT DUE ----->				140,447.91



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 To Report Technical Difficulties 1-800-226-5040

ADDRESSEE:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910809001
 INVOICE DATE: 08/09/91
 SERVICE PERIOD:
 07/01/91 - 07/31/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS **TOTAL AMOUNT**

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	12,284	48,998.9		36,197.44
TRAVEL SERVICE	676	3,624.0	.1900	688.56
INBOUND 800	7,154	34,184.0	.2100	7,178.64
INTRALATA	10,075	26,572.1	.1200	3,188.65
INTRASTATE	10,610	30,202.6	.1250	3,775.33
INTERSTATE ON NET	32,367	107,337.7	.1400	15,027.28
INTERSTATE OFF NET	12,467	40,378.9	.1500	6,056.84
SUBTOTAL	85,633	291,298.2		72,112.74
EVENING USAGE:				
TRAVEL SERVICE	426	3,312.0	.1600	529.92
INBOUND 800	801	3,083.0	.2100	647.43
INTRALATA	1,657	5,231.1	.1200	627.73
INTRASTATE	1,427	6,765.0	.1250	845.63
INTERSTATE ON NET	5,914	33,529.4	.1400	4,694.12
INTERSTATE OFF NET	1,453	7,049.0	.1500	1,057.35
SUBTOTAL	11,678	58,969.5		8,402.18
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	256	2,617.0	.1600	418.72
INBOUND 800	472	951.0	.2100	199.71
INTRALATA	662	2,274.0	.1200	272.88
INTRASTATE	401	2,088.4	.1250	261.05
INTERSTATE ON NET	2,267	15,734.4	.1400	2,202.82
INTERSTATE OFF NET	411	2,760.9	.1500	414.14
SUBTOTAL	4,469	26,425.7		3,769.32
CREDIT 15% DOMESTIC USAGE				(7,213.02)
CURRENT BALANCE				77,071.22
PREVIOUS BALANCE				140,447.91
PAYMENT - THANK YOU				(32,264.45)
TOTAL AMOUNT DUE →				185,254.68



1515 S. Federal Hwy., Suite 400
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 1-800-226-5043 (Customers within FL & GA)
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 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910809001
 INVOICE DATE: 010/02/91
 SERVICE PERIOD:
 08/01/91 - 08/31/91

TELECOMMUNICATION SERVICES INC.
 12224 N.W. 129TH COURT
 SUITE 100
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS **TOTAL AMOUNT**

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	15,404	63,639.5		47,103.43
TRAVEL SERVICE	579	2,764.0	.1900	525.16
INBOUND 800	10,522	39,283.0	.2100	8,249.43
INTRALATA	13,387	33,348.5	.1200	4,001.32
INTRASTATE	12,594	37,084.8	.1250	4,635.60
INTERSTATE ON NET	34,581	113,888.3	.1400	15,944.36
INTERSTATE OFF NET	16,100	46,387.2	.1500	6,958.38
SUBTOTAL	103,167	336,395.3		67,419.90
EVENING USAGE:				
TRAVEL SERVICE	287	1,699.0	.1600	271.84
INBOUND 800	1,176	3,952.0	.2100	829.92
INTRALATA	2,757	8,200.4	.1200	984.35
INTRASTATE	1,754	8,572.0	.1250	1,071.50
INTERSTATE ON NET	6,119	33,977.1	.1400	4,756.79
INTERSTATE OFF NET	1,661	7,667.7	.1500	1,150.16
SUBTOTAL	13,754	64,068.2		9,064.26
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	182	1,357.0	.1600	217.12
INBOUND 800	794	1,790.0	.2100	375.90
INTRALATA	1067	3,114.7	.1200	373.76
INTRASTATE	586	3,310.9	.1250	413.86
INTERSTATE ON NET	2,768	22,272.7	.1400	3,116.18
INTERSTATE OFF NET	579	4,933.7	.1500	740.06
SUBTOTAL	5,976	36,779.0		5,238.88
CREDIT 15% DOMESTIC USAGE				(8,192.64)
CURRENT BALANCE				93,530.40
PREVIOUS BALANCE				185,254.68
PAYMENT - THANK YOU				(64,657.56)
PAYMENT - THANK YOU				(58,186.85)
TOTAL AMOUNT DUE ----->				155,740.67



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 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910930001
 INVOICE DATE: 04/08/92
 SERVICE PERIOD:
 09/01/91 - 09/30/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	13,860	60,478.5		43,878.19
TRAVEL SERVICE	521	2,348.0	.1900	446.12
INBOUND 800	8,757	30,464.0	.2100	6,439.44
INTRALATA	10,369	27,986.8	.1200	3,558.42
INTRASTATE	11,910	35,613.9	.1250	4,451.74
INTERSTATE ON NET	34,477	111,528.9	.1400	15,614.05
INTERSTATE OFF NET	13,837	42,687.5	.1500	6,403.13
SUBTOTAL	93,731	311,307.6		80,591.09
EVENING USAGE:				
TRAVEL SERVICE	330	2,180.0	.1600	348.80
INBOUND 800	1,285	4,126.0	.2100	866.46
INTRALATA	3,997	9,249.4	.1200	1,109.93
INTRASTATE	1,712	7,923.9	.1250	990.49
INTERSTATE ON NET	6,114	31,263.9	.1400	4,376.95
INTERSTATE OFF NET	1,513	7,835.2	.1500	1,175.28
SUBTOTAL	14,951	62,578.4		8,867.91
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	247	1,549.0	.1600	247.84
INBOUND 800	1,361	3,272.0	.2100	687.12
INTRALATA	1,518	4,269.0	.1200	512.28
INTRASTATE	588	3,942.0	.1250	492.75
INTERSTATE ON NET	3,200	27,027.0	.1400	3,783.78
INTERSTATE OFF NET	599	4,617.0	.1500	692.55
SUBTOTAL	7,513	44,676.0		6,416.32
CREDIT 15% DOMESTIC USAGE				(7,799.57)
CURRENT BALANCE				88,075.75
PREVIOUS BALANCE				548,428.17
TOTAL AMOUNT DUE ----->				636,503.92

418561.6



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-228-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910809001
 INVOICE DATE: 12/06/91
 SERVICE PERIOD:
 10/01/91 - 10/31/91

TELECOMMUNICATION SERVICES INC.
 11001 S.W. 17TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	14,820	64,495.3		47,094.31
TRAVEL SERVICE	582	3,142.0	.1900	596.69
INBOUND 800	4,769	15,612.0	.2100	3,278.52
INTRALATA	14,192	36,047.3	.1200	4,325.68
INTRASTATE	16,025	45,456.5	.1250	5,682.06
INTERSTATE ON NET	44,740	144,549.6	.1400	20,236.94
INTERSTATE OFF NET	19,555	58,009.8	.1500	8,701.47
SUBTOTAL	114,783	367,312.5		89,915.96
EVENING USAGE:				
TRAVEL SERVICE	370	2,600.0	.1600	416.00
INBOUND 800	831	2,459.0	.2100	516.39
INTRALATA	5,183	11,562.4	.1200	1,387.49
INTRASTATE	2,200	10,629.8	.1250	1,328.73
INTERSTATE ON NET	8,118	45,425.4	.1400	6,359.56
INTERSTATE OFF NET	2,114	10,958.1	.1500	1,643.72
SUBTOTAL	18,816	83,634.7		11,651.89
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	327	2,117.0	.1600	338.72
INBOUND 800	752	2,144.0	.2100	450.24
INTRALATA	2237	5,975.5	.1200	717.06
INTRASTATE	1606	7,349.6	.1250	918.70
INTERSTATE ON NET	5,716	36,583.9	.1400	5,121.75
INTERSTATE OFF NET	1,584	7,960.9	.1500	1,194.14
SUBTOTAL	12,222	62,130.9		8,740.61
CREDIT 15% DOMESTIC USAGE				(9,482.12)
CURRENT BALANCE				100,826.34
PREVIOUS BALANCE				155,740.67
PAYMENT - THANK YOU				
PAYMENT - THANK YOU				
TOTAL AMOUNT DUE				256,567.01



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 910809001
 INVOICE DATE: 12/10/91
 SERVICE PERIOD:
 11/01/91 - 11/30/91

TELECOMMUNICATION SERVICES INC.
 10021 S.W. 134TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	13,635	59,275.8		43,158.12
TRAVEL SERVICE	818	3,480.0	.1900	661.20
INBOUND 800	5,651	17,728.0	.2100	3,722.88
INTRALATA	11,485	29,783.8	.1200	3,574.06
INTRASTATE	10,152	30,570.5	.1250	3,821.31
INTERSTATE ON NET	34,963	117,144.6	.1400	16,400.74
INTERSTATE OFF NET	16,711	48,355.6	.1500	7,255.74
SUBTOTAL	93,415	306,338.3		78,591.15
EVENING USAGE:				
TRAVEL SERVICE	459	2,687.0	.1600	429.92
INBOUND 800	1,131	3,331.0	.2100	699.51
INTRALATA	3,740	9,941.0	.1200	1,192.92
INTRASTATE	1,532	7,790.5	.1250	973.81
INTERSTATE ON NET	7,655	42,141.6	.1400	5,899.62
INTERSTATE OFF NET	2,006	9,714.2	.1500	1,457.13
SUBTOTAL	16,523	75,605.3		10,653.11
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	457	2,846.0	.1600	455.36
INBOUND 800	1475	4,151.0	.2100	871.71
INTRALATA	2536	7,087.7	.1200	850.52
INTRASTATE	1256	6,424.7	.1250	803.09
INTERSTATE ON NET	7,144	44,508.1	.1400	6,231.13
INTERSTATE OFF NET	1,826	8,056.6	.1500	1,208.49
SUBTOTAL	14,694	73,074.1		10,420.30
CREDIT 15% DOMESTIC USAGE				(8,475.97)
CURRENT BALANCE				91,188.59
PREVIOUS BALANCE				256,567.01
TOTAL AMOUNT DUE ----->				347,755.60



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-228-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

INVOICE NO: 911231001
 INVOICE DATE: 04/08/92
 SERVICE PERIOD:
 12/01/91 - 12/31/91

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	12,619	56,752.4		41,038.65
TRAVEL SERVICE	716	3,299.0	.1900	626.81
INBOUND 800	5,393	17,027.0	.2100	3,575.67
INTRALATA	11,029	28,456.9	.1200	3,414.83
INTRASTATE	9,696	29,078.5	.1250	3,634.81
INTERSTATE ON NET	33,706	109,685.9	.1400	15,356.03
INTERSTATE OFF NET	18,611	52,178.7	.1500	7,826.81
SUBTOTAL	91,770	296,478.4		75,473.61
EVENING USAGE:				
TRAVEL SERVICE	565	3,549.5	.1600	567.92
INBOUND 800	1,290	3,778.5	.2100	793.49
INTRALATA	3,406	9,548.6	.1200	1,145.83
INTRASTATE	1,633	8,673.4	.1250	1,084.18
INTERSTATE ON NET	8,034	45,321.9	.1400	6,345.07
INTERSTATE OFF NET	2,370	11,456.1	.1500	1,718.42
SUBTOTAL	17,300	82,328.0		11,654.91
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	483	3,407.0	.1600	545.12
INBOUND 800	1,419	4,018.0	.2100	843.78
INTRALATA	1,874	5,464.4	.1200	653.73
INTRASTATE	947	5,676.7	.1250	709.59
INTERSTATE ON NET	5,736	39,116.7	.1400	5,476.34
INTERSTATE OFF NET	1,603	8,239.6	.1500	1,233.94
SUBTOTAL	12,062	65,922.4		9,466.50
CREDIT 15% DOMESTIC USAGE				(8,333.46)
CURRENT BALANCE				88,261.56
PREVIOUS BALANCE				636,503.92
TOTAL AMOUNT DUE <----->				724,765.48



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-226-5043 (Customers within FL & GA)
 1-800-432-6043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-226-5040

REMIT TO:
 ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

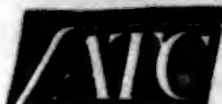
INVOICE NO: 910809001
 INVOICE DATE: 03/10/92
 SERVICE PERIOD:
 02/01/92 - 02/29/92

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CATEGORY:	CALLS:	MINUTES:	RATES:	AMOUNT DUE:
DAY USAGE:				
INTERNATIONAL	14,268	73,943.1		49,597.55
TRAVEL SERVICE	881	4,804.0	.1900	912.76
INBOUND 800	6,939	22,784.0	.2100	4,784.64
INTRALATA	12,117	32,100.8	.1200	3,852.10
INTRASTATE	10,175	31,179.0	.1250	3,897.38
INTERSTATE ON NET	37,693	129,302.7	.1400	18,102.38
INTERSTATE OFF NET	17,542	48,242.5	.1500	7,236.38
SUBTOTAL	99,615	342,336.1		88,383.19
EVENING USAGE:				
TRAVEL SERVICE	578	4,286.0	.1600	685.76
INBOUND 800	1,443	4,519.0	.2100	948.99
INTRALATA	2,409	8,259.1	.1200	991.09
INTRASTATE	1,680	9,402.6	.1250	1,175.33
INTERSTATE ON NET	8,150	49,663.5	.1400	6,952.89
INTERSTATE OFF NET	1,844	9,691.1	.1500	1,453.67
SUBTOTAL	16,104	85,821.3		12,207.73
NIGHT/WEEKEND USAGE:				
TRAVEL SERVICE	454	5,087.0	.1600	813.92
INBOUND 800	1,371	3,947.0	.2100	828.87
INTRALATA	1,225	4,391.3	.1200	526.96
INTRASTATE	963	5,819.6	.1250	727.45
INTERSTATE ON NET	6,131	46,330.5	.1400	6,486.27
INTERSTATE OFF NET	1,443	6,978.9	.1500	1,046.84
SUBTOTAL	11,587	72,554.3		10,430.31
CREDIT 15% DOMESTIC USAGE				(9,213.55)
CURRENT BALANCE				101,807.68
PREVIOUS BALANCE				446,620.49
TOTAL AMOUNT DUE				548,428.17



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-228-5040

REMIT TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

CUSTOMER NO: 220002
 INVOICE NO: 22000227
 INVOICE DATE: 04/04/92
 SERVICE PERIOD:
 02/28/92 - 03/27/92

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS TOTAL AMOUNT

CURRENT ACCOUNT ACTIVITY

USAGE CHARGES:

PRODUCT TYPE: 362 - ONLINE CALLING CARD	
INTRASTATE	2,431.86
INTERSTATE	574.52
INTRASTATE DIR ASST	.50
INTERSTATE DIR ASST	.64
INTERNATIONAL	1,387.66
PRODUCT TYPE: 816 - ACCLAIM! 800 SW	
INTRASTATE	5,182.88
INTERSTATE	4,371.17
PRODUCT TYPE: 548 - SWITCHLESS RESELLER	
INTRASTATE	8,196.59
INTERSTATE	19,448.24
INTRASTATE DIR ASST	171.00
INTERSTATE DIR ASST	415.36
INTERNATIONAL	17,726.76

SUBTOTAL

59,907.18

MAGNETIC TAPE MONTHLY FEE

75.00

VOLUME DISCOUNT

(1,281.00)

TOTAL CURRENT CHARGES

58,701.18

PREVIOUS BALANCE

724,765.48

PAYMENT - THANK YOU

(100,000.00)

PAYMENT - THANK YOU

(20,000.00)

TOTAL AMOUNT DUE ----->

663,466.66



1515 S. Federal Hwy., Suite 400
 Boca Raton, Florida 33432-7404
 1-800-228-5043 (Customers within FL & GA)
 1-800-432-5043 Ext. 3 (Customers outside FL & GA)
 To Report Technical Difficulties 1-800-228-5040

REMIT TO:

ATC
 1515 SOUTH FEDERAL HIGHWAY
 SUITE 400
 BOCA RATON, FL 33432-7404

CUSTOMER NO: 220002
 INVOICE NO: 22000227
 INVOICE DATE: 06/06/92
 SERVICE PERIOD:
 04/28/92 - 05/27/92

TELECOMMUNICATION SERVICES INC.
 12221 S.W. 129TH COURT
 SUITE 200
 MIAMI, FL 33186

PAGE 1 TOTAL AMOUNT

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS.

USAGE CHARGES:

PRODUCT TYPE: 362 - ONLINE CALLING CARD	
INTRASTATE	801.30
INTERSTATE	907.94
INTRASTATE DIR ASST	2.00
INTERSTATE DIR ASST	1.92
INTERNATIONAL	1,359.02
PRODUCT TYPE: 800 - HOMEBOUND 800	
INTRASTATE	191.96
INTERSTATE	798.33
PRODUCT TYPE: 816 - ACCLAIM! III 800 SW	
INTRASTATE	7,990.95
INTERSTATE	4,456.35
PRODUCT TYPE: 548 - SWITCHLESS RESELLER	
INTRASTATE	3,276.93
INTERSTATE	3,965.34
INTRASTATE DIR ASST	83.00
INTERSTATE DIR ASST	165.76
INTERNATIONAL	6,433.06

SUB-TOTAL 30,434.18

RECURRING CHARGES:

MAGNETIC TAPE MONTHLY FEE	75.00
SUB-TOTAL	75.00

CREDIT 15% DOMESTIC USAGE (3,358.41)

CURRENT BALANCE 27,150.77

PREVIOUS BALANCE 640,323.39

TOTAL AMOUNT DUE -----> 667,474.16



REMIT TO:

1515 S. Federal Hwy., Suite 400
Boca Raton, Florida 33432-7404
1-800-226-5043 (Customers within FL & GA)
1-800-432-5043 Ext. 3 (Customers outside FL & GA)
To Report Technical Difficulties 1-800-226-5040

ATC
1515 SOUTH FEDERAL HIGHWAY
SUITE 400
BOCA RATON, FL 33432-7404

CUSTOMER NO: 220002
INVOICE NO: 22000227
INVOICE DATE: 07/01/92
SERVICE PERIOD:
05/28/92 - 06/27/92

TELECOMMUNICATION SERVICES INC.
12221 S.W. 129TH COURT
SUITE 200
MIAMI, FL 33186

PAGE 1 TOTAL AMOUNT

PER CONTRACT 50% OF BAL. IS DUE WITHIN 15 DAYS/50% NEXT 15 DAYS.

USAGE CHARGES:

PRODUCT TYPE: 362 - ONLINE CALLING CARD	
INTRASTATE	11.45
INTERSTATE	48.14
PRODUCT TYPE: 816 - ACCLAIM! III 800 SW	
INTRASTATE	157.06
INTERSTATE	30.93
PRODUCT TYPE: 548 - SWITCHLESS RESELLER	
INTRASTATE	23.78
INTERSTATE	57.43
INTERSTATE DIR ASST	3.20

SUB-TOTAL

332.00

CREDIT 15% DOMESTIC USAGE

(49.32)

CURRENT BALANCE

282.68

PREVIOUS BALANCE

667,474.16

GOODWILL

(299.05)

TOTAL AMOUNT DUE ----->

667,457.79

EXHIBIT _____
(MJD - 17)

EXHIBIT

TSL#17 8/24/94 MG

February 13, 1990

Ms. Mary Jo Daniels
Advanced Telecommunications Corp.
1511 S. Federal Hwy., P.O. Box 1000
Boca Raton, Fla. 33432-7404

Dear Ms. Daniels:

Please assist me in the following request: as you know I am currently receiving a report along with the bills that provides the same information as the information provided on the invoice you bill me, but I get it by account.

On this report all calls duration are listed on this report the same as the customer's bill except international calls are listed at 5 second billing.

Can we modify this report to have the same information, to match the customer's actual bill with totals to each category by day, eve, and n/w.

As we discussed I am currently been billed at full minutes on the travel service usage as well as 1-800 service, please correct this mistake for future bills.

I have also noticed on all domestic 1+ calls I'm billed for the time as the customer, therefore not profiting from the 30 second minimum.

It would be essential if a 1-800 number such as networks solutions for all my travel service customers.

On travel service my rates for eve, n/w were reduced to \$.16 a minute, see attached document. Please correct this incorrect rate.

I have noticed in your regular tariffed services that your n/w rates are lower than my rates.

I would like to request a reduction on interstate n/w rates to \$.12 a minute. Should this request be granted you will note an immediate increase on traffic.

Please note there has been a number of deduction due to these incorrect billing as well as incompleated calls billed. These calls were all made by fax machines lines.

As you know, the company is still in the process of reorganizing.
Please feel free to call me.

Sincerely,

Jonl. Fournier,
President

JF/dge

EXHIBIT _____
(MJD - 18)

EXHIBIT

TSI #18 MO 3/24/94

TO: MARY JO DAURIC
FROM: JOEL ESQUENAZI
RE: INACCURATE BILLING TO TSI
4/20/90

DEAR MARY JO:
WE HAVE DISCUSSED A NUMBER OF TIMES THE INACCURATE BILLING.

I HAVE NOTICE THAT ACCOUNTS UTILIZING MY SERVICES THAT ARE BILLED AT ONE MINUTE BILLING; YOU'RE ALSO BILLING ME AT ONE FULL MINUTE.

ALSO TRAVEL SERVICES, AND 1-800 SERVICES ARE STILL SEEN BILLED AT ONE FULL MINUTE. ALL OF THESE SERVICES SHOULD BE BILLED AT SIX SECOND INCRUMENTS; THEREFORE I'M LOSING MONEY DUE TO THIS ERPOP.

I HAVE DEDUCTED THE DIFFERENCE OF WHAT I ESTIMATE THE OVER CHARGES ARE DUE TO THE INCORRECT BILLING..

ENCLOSED IS THE FULL PAYMENT OF \$19,863.92 FOR THE MONTH OF JANUARY, 1990.

PLEASE ASSIST ME IN CORRECTING THIS PROBLEM TO AVOID DISPUTES.

THANK YOU

EXHIBIT _____
(MJD - 19)

June 17, 1990

EXHIBIT

TSE #19 8/24/94
MS

ATC
Ms. Mary Jo Daurio
1515 S. Federal Hwy.
Suite 400, Rm 4022
Boca Raton, Florida 33432-7404

Dear Ms. Daurio;

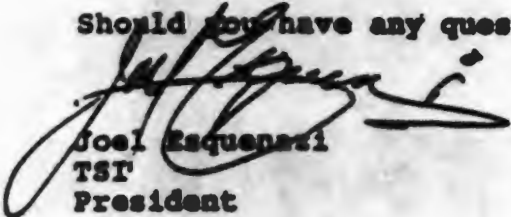
Attached is the full payment for the usage of the month of March 1990.

As previously, I have deducted the incorrect billing on the amount of \$4,912.12. I have also deducted an additional \$1,454.35 for calls that as you can see are double billed are incorrectly billed.

As you know I dont give any credit to my customer for wrong numbers, unanswered calls, but as you can see all these calls are justified and incorrectly billed. This is a problem in which I have brought it to the attention of Ivette Castro, but it seems to be an uncontrollable situation.

I am not going to advise all my customers that they have a billing problems, if they bring it to my attention and request credit our tariffs specify that we must and obviously, I must deduct from ATC since it is clear that there is a problem. I will be sending the check for accounts billed by Telus by next week.

Should you have any questions, please call me.


Joel Esquenazi
TSE
President

JE/dga
encs.

EXHIBIT _____
(MJD - 20)

EXHIBIT

TSI #20 5/24/94
Mo

July 16, 1990

To: Mary Jo Daurio

From: Joel Escuenazi

Dear Ms. Daurio:

Enclosed please find payments for April and May 1990 usage as well as the payment for those accounts that were billed by Tel-Us totaling \$1,989.16. I have deducted for the month of April's usage the usual incorrect billing and in addition an extra \$3,500.00 this additional deduction was due to the fact customer account # 207 on my case was billed double for calls going back to February and March totaling the amount specified above. This incorrect billing was for the month of April in which it had its billing errors.

On the customers that have been billed by Tel-Us, TSI owes you a total \$1,383.96 for accounts that have paid me.

Attached please find invoices of accounts that were billed by Tel-Us incorrectly and they paid Tel-Us directly and I never got credit for it. Therefore I am deducting my credit owe me and sending you the difference.

In reference to your letter dated July 12, 1990 I'm sure you're aware that each and every month since we started doing business I have not yet received my bills earlier than the twelve day of the next month, and as you know April's bill was 50 days late.

I am sure you understand that this delay discordinates and delays the normal process of operation not only for my company but it creates an accounting nightmare for my customers.

Should I receive the bills each month and later than five days after the end of the month you will receive your money on time.

I hope these payments clears any and all outstanding balances between your company and TSI excluding usage payment for the month of June and thereof.

EXHIBIT _____
(MJD - 21)

EXHIBIT

TSL # 21 ^{5/24/94} MG

MARCH 9, 1991

JOE ESCUENAZI

MARY JO DAIRLO

ATC

407-750-2720, 407-750-2733 (FAX)

Please sign if you concur and
fax back asap

Thanks

Mary Jo

TOTAL Due
60,166.80.



<u>USAGE</u>	<u>AMOUNT DUE</u>	<u>PAYMENT</u>	<u>CREDIT</u>	<u>BALANCE</u>
10/8	\$11,017.98	\$11,017.98	-	0
11/8	\$15,542.02	\$ 7,771.00	-	\$ 7,771.02
	\$16,778.95	\$21,750.20	\$ 799.77	0
	\$22,407.86	\$19,869.92	\$ 2,741.94	0
2/90	\$24,559.38	\$20,875.47	\$ 3,683.91	0
	\$30,700.74	\$24,334.27	\$ 6,366.47	0
4/90	\$31,055.60	-	\$ 6,665.33	\$ 24,390.27
5/90	\$33,228.03	\$28,805.37	\$ 6,000.00	\$ 2,812.93
6/90	\$35,878.00	\$35,532.85	\$ 3,158.08	0
7/90	\$35,773.65	\$71,547.30	-	(35,773.65)
8/90	\$41,670.90	-	-	\$ 3,100.25
9/90	\$40,443.71	-	-	\$ 46,340.36
10/90	\$53,974.35	-	-	\$100,315.31
11/90	\$41,738.40	-	-	\$142,053.71
12/90	\$43,037.86	-	-	\$185,091.57
1/91	\$48,032.36	-	-	\$233,123.93
2/91	\$42,890.44	\$90,000.00	\$21,581.73	\$164,432.20

<u>USAGE</u>	<u>AMOUNT DUE</u>	<u>PAYMENT</u>	<u>CREDIT</u>	<u>BALANCE</u>
10/89	\$11,017.98	\$11,017.98	-	0
11/89	\$15,542.02	\$ 7,771.00	-	\$ 7,771.02
12/89	\$16,778.95	\$23,750.20	\$ 799.77	0
1/90	\$22,607.86	\$19,865.92	\$ 2,741.94	0
2/90	\$24,559.38	\$20,875.47	\$ 3,683.91	0
3/90	\$30,700.74	\$24,334.27	\$ 6,366.47	0
4/90	\$31,055.60	-	\$ 6,665.33	\$ 24,390.27
5/90	\$33,228.03	\$48,805.37	\$ 6,000.00	\$ 2,812.93
6/90	\$35,878.00	\$35,532.85	\$ 3,158.08	0
7/90	\$38,773.65	\$71,547.30	-	(35,773.65)
8/90	\$41,670.90			\$ 3,897.25
9/90	\$40,443.71	-	-	\$ 44,340.96
10/90	\$53,974.35	-	-	\$100,315.11
11/90	\$41,734.40	-	-	\$142,053.71
12/90	\$43,037.86	-	-	\$185,091.57
1/91	\$48,032.36	-	-	\$233,123.93
2/91	\$42,890.44	\$90,000.00	\$21,581.73	\$164,432.64

PAID IN FULL w/acceptance of D. Ferenc

EXHIBIT _____
(MJD - 22)

EXHIBIT

8/24/74
TSI #22 MG

ESSE-E 00 0710

MR-12-91 REC 1474

TEPH ID: TSI LONG DISTANCE CC P-0586
TEL NO: 302-251-7717

NO.	DATE	ST. TIME	TYPE	RE	ID	DEPT	CODE	G	IG
450	08-22	14:00	30	0000	470	0000TE	01	800A	02 00

PLANTING
6-5-91 KE



Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

To: Mary Jo David

FAX #: () _____

From: Joel

Number of pages to follow 2

Comments _____



TO: Mary Jo Daurio
FROM: Joel Esquenazi *ME*
DATE: March 13, 1991

Dear Ms. Daurio;

Apparently there is a big discrepancy in your accounting and the actual amount owed to your company.

I have done a complete accounting of my accounts up to 2/91 usage.

My records indicate a completely different total to yours. After all deductions I made on your bills the total owed to ATC is \$155,008.87

I have sent you all records and deductions through the mail, due to the quantity of documents for your reviewal.

This balance will be paid in the following way:

I will send 50% of the Feb. 1991 charges on March 25, 1991 and the remainder of the balance on April 8, 1991 with an additional check of \$20,000.00

This will leave a balance of \$92,118.43.

When the March usage payment is due for the first 50% I will include an additional \$20,000.00 and on the second half of the payment, I will include the due payment and an additional \$20,000.00

On every due payment I will include the payment due and an additional \$20,000.00

This payment schedule will have the complete past due balance up to date by the end of May.

Should you have any questions concerning this payment schedule; please call me as soon as possible.

A FULL SERVICE COMMUNICATIONS COMPANY

12221 S.W. 128th Court • Suite 200 • Miami, Florida 33186 • Phone: (305) 251-2700 • Fax: (305) 251-3565

EXHIBIT _____
(MJD - 23)

EXHIBIT

3/24/94
TSI #23 Ms

PAYMENT ARRANGEMENTS

\$164,432.65	-	Balance as of February Invoice
<u>-10,000.00</u>	-	Unsettled Dispute
\$154,432.65		
<u>-15,000.00</u>	-	3/25 Ms 3/25
\$119,432.65		
<u>-17,890.44</u>	-	4/8
\$ 81,542.21		
<u>-20,000.00</u>	-	4/20 + 50% of March (20,000.00)
\$ 61,542.21		
<u>-20,000.00</u>	-	5/6 + Balance of March (20,000.00)
\$ 41,542.21		
<u>-20,000.00</u>	-	5/20 + 50% of April
\$ 21,542.21		
\$ 21,542.21	-	6/4 + Balance of April

EXHIBIT _____
(MJD - 24)

EXHIBIT

MARCH 8, 1991

3/24/94
TSI #24 AG

JOEL ESAMENAZI

MARY JO DAVLO

ATC

407-750-2720, 407-750-273

(FAX)



1515 South Federal Highway
 Suite 400
 Boca Raton, FL 33432-7404
 (407) 392-2244

Mar. 13, 1991

Telecommunication Services Inc.
 12221 SW 129th Ct
 Suite 200
 Miami, FL 33186

Dear Mr. Esquenazi,

I have just received your fax regarding the payment arrangements I requested. The information provided is not acceptable. What I require is a detailed payment schedule with firm dates and amounts to clear the balance of \$178,897.00. I would also like to advise you that this schedule is only to clear the past balance and the current invoice and all future invoices must be paid in full within 30 days of invoicing. Currently this means that the February invoice in the amount of \$48,032.36 must be paid in full by April 8, 1991.

Until a satisfactory payment schedule is received ATC will discontinue processing orders for T.S.I.

I am setting up a meeting for next week to gather the information you are requesting regarding the billing tape. I will advise you of these results and when you can expect a test tape.

I have also check into your request to purchase dialers and I will call you as soon as I receive a reply.

If you have any questions please call me at 407-750-2720

Sincerely,

Mary Jo Daurio

Mary Jo Daurio

EXHIBIT _____
(MJD - 25)

EXHIBIT - B

STANDARD TAPE FORMAT

EXHIBIT

8/24/94
TSI #25 MG

<u>Field Description</u>	<u>Length</u>
ACCOUNT NUMBER	10 N
ANI	10 N
AUTH CODE	14 N
SERVICE TYPE	3 N
USAGE TYPE	1 N
LATA	4 N
CALLED DEST NUMBER	16 N
(CALLED NPA/NXX/LINE COMBINED IN DESTINATION NUMBER)	
PROJECT CODE	16 N
CALL YMD	6 N
CALL TIME	6 N
CALL DURATION	6 N (4.2)
CALL COST	8 N (6.2)
STATE CODE	2 A/W
CALLED CITY	10 A/W
CALL START PERIOD CODE	1 N
CALL DURATION DAY	6 N (4.2)
CALL COST DAY	8 N (6.2)
CALL DURATION EVE	6 N (4.2)
CALL COST EVE	8 N (6.2)
CALL DURATION NIGHT	6 N (4.2)
CALL COST NIGHT	8 N (6.2)
MILEAGE OF CALL	5 N
SEQUENCE NUMBER	5 N
BAND / TIER	2 N
ORIG SWITCH	2 N
ORIG TRUNK GROUP	4 N
TERM TRUNK GROUP	4 N
BILL DATE	3 N
INCREMENT	2 N

Filler 38 A/W
 Record Length: 220
 Block Size: 22,000

EXHIBIT _____
(MJD - 26)

EXHIBIT

5/21/94
TSI #26 MG

$$\begin{array}{r}
 186,014.37 \\
 - 9,990.62 \\
 - 1,591.11 \quad \rangle
 \end{array}$$

lost cust
unrelated with distribution

21,581.73

$$\begin{array}{r}
 186,014.37 \\
 21,581.73 \\
 \hline
 164,432.64
 \end{array}$$

(9400 < TSI
Req)

10,000 00 dispute

154,432.64

$$\begin{array}{r}
 154,432.64 \\
 42,890.44 \\
 \hline
 111,542.20
 \end{array}$$

30

$$\begin{array}{r}
 81 \\
 \hline
 75 \\
 66 \\
 30 \\
 \hline
 36
 \end{array}$$

$$\begin{array}{r}
 81 \\
 \hline
 20 \\
 61 \\
 40 \\
 \hline
 21 \\
 21
 \end{array}$$

EXHIBIT _____
(MJD - 27)

ATC INTEROFFICE MEMORANDUM

EXHIBIT

Dist. 3/25/94
TSI#27 MG

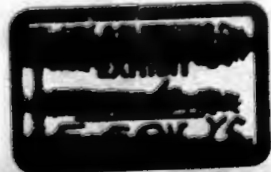
TO: LORI WAITE
FROM: MARY JO DAURIO *MJD*
DATE: APRIL 11, 1991
RE: TSI

This memo will confirm credit issued to TSI in the amount of \$21,581.73, for seven (7) months of one minute calls and no answer calls.

If you have any questions, please contact me at extension 2720.

MJD/pr

JK
[Signature]



ATC INTEROFFICE MEMORANDUM

TO: LORI WAITE
FROM: MARY JO DAURIO
DATE: MAY 10, 1991
SUBJECT: T.S.I.

Please post a credit of \$21,375.85 to Joel's April invoice.

We are crediting this amount, due to a miscalculation of International calls from his first bill in 1989 through June, 1990.

This credit is in addition to the one submitted last month in the amount of \$21,581.73.

MJD/pr



ATC INTEROFFICE MEMORANDUM

DATE: JULY 11, 1991

TO: SHARON COPLIN
FROM: MARY JO DAURIG *MDJ*
SUBJECT: T.S.I. CREDIT

.....
PLEASE SHOW A CREDIT OF \$22,492.77 ON THE NEXT INVOICE FOR
T.S.I. . . THE CREDIT IS DUE TO DOUBLE BILLING ON THE MARCH
AND APRIL STATEMENTS AND AN INVOICING ERROR WHERE THE TRAFFIC
SUMMARY SHOWED MORE USAGE THAN THE CUSTOMER'S INVOICE. I
HAVE VERIFIED THE ACCURACY OF THIS CREDIT BY VERIFYING THE
INVOICES AND TRAFFIC SUMMARIES FOR THE 2 MONTHS.

IF YOU REQUIRE ANY FURTHER INFORMATION PLEASE CALL ME AT
EXT. 2720.

Bill

EXHIBIT _____
(MJD - 28)

EXHIBIT

8/24/94

TSI #23 MB

September 5, 1991

ATC
1515 S. Federal Hwy.
Boca Raton, Fla. 33432

The following items are issues that have caused our company, TSI, immense problems/concerns:

- 1) TSI accounts continually being billed by ATC.
- 2) TSI accounts receiving sales literature, calling cards, etc. in the mail.
- 3) Our bills are sent each month at varying dates, sometimes as late as one month.
- 4) "Double-billing" by ATC.
- 5) "Over-billing" by ATC.
- 6) ATC has never provided us with a dedicated wats program as originally promised.
- 7) The conversion to the new billing system that was discussed originally 5/20/91 causing major financial impact to TSI and has moved very slowly.
- 8) Poor handling of our account, especially considering we'll do approximately \$1.5 million of sales in 1991.
- 9) Too many individuals contacting us and no consistency of communications.
- 10) Lack of program to effectively switch all new ans via Southern Bell.
- 11) Lack of contract.
- 12) Future of ATC (i.e. will it be bought out?, and if so insure our contract being "Grandfathered"?)

EXHIBIT _____
(MJD - 29)



EXHIBIT

8/24/94
TSI # 29 MG

TELEFAX MESSAGE

DATE: 6/28/90 TIME: 4:30

TO: Mary Jo Davis

TELEPHONE: 2733

FROM: Loi Ricci

TELEPHONE: 6755

NUMBER OF PAGES EXCLUDING COVER SHEET: 1

COMMENTS: _____





INTEROFFICE MEMORANDUM

TO: Mary Jo Maurio
 FROM: Lori Rice - Miami Collection Dept.
 DATE: June 28, 1990
 SUBJECT: T S I Accounts

Below is a list of T S I accounts:

<u>Acct #</u>	<u>Name</u>	<u>Total Due</u>
341753	L & M Mfg. Corp.	1,834.24 * (Unapproved Credit)
348734	Hawkeye Radio Alarm, Inc.	197.61 *
347228	Miami Explosion, Inc.	62.72 CHECK
344731	Amalgated Trge. Corp.	81.35
344721	Micronet Telecom, Inc.	191.14 *
342339	Roca Tile & Marble, Inc.	245.41 *
344724	Ingersoll Rand, Inc.	63.92 *
161103	International Flower Exc.	2,482.13 *

\$190.06

5158.52

- 1898.16

3260.36

new
new

573-392
573-8238
573-9061
573-0320

EXHIBIT _____
(MJD - 30)



1515 South Federal Highway
Boca Raton, FL 33432-7404

EXHIBIT

8/24/94
TSI # 30 MS

PAGE: 1

ADVANCE MARINE SUPPLY CORP.
8388 N.W. 15TH ST.
MIAMI FL 33178

CUSTOMER NUMBER: 208878
INVOICE NUMBER: 100112828
INVOICE DATE: 08/01/90
SERVICE PERIOD: 07/01/90 - 07/31/90
PRIOR ACCOUNT: 018798

TOTAL AMOUNT DUE: \$187.00

.....

BILLING INQUIRIES AND GENERAL INFORMATION (8AM-5PM, M-F)

IN FLORIDA AND GEORGIA: 1-800-228-8043
OUTSIDE FLORIDA AND GEORGIA: 1-800-432-8043 EXT 8

TECHNICAL INQUIRIES (24 HOURS/DAY 7 DAYS/WEEK)

IN FLORIDA AND GEORGIA: 1-800-228-8040
OUTSIDE FLORIDA AND GEORGIA: 1-800-432-8044

.....

WHO'S CALLING YOU? 800 SERVICE CUSTOMERS WILL SOON RECEIVE ENHANCED CALL DETAIL INFORMATION FOR CALLS PLACED FROM ATC ORIGINATING CITIES.

Pay \$187.00

PLEASE DETACH AND RETURN LOWER PORTION WITH PAYMENT

85.65

CUSTOMER NUMBER: 208878
INVOICE NUMBER: 100112828
INVOICE DATE: 08/01/90
INVOICE DUE DATE: 08/01/90

TOTAL AMOUNT DUE:	\$187.00
AMOUNT ENCLOSED:	

PAID
9/2/90
11/68

*PLEASE CHECK BOX TO INDICATE ADDRESS CHANGE AND ENTER CORRECTION ON REVERSE.

PLEASE ADDRESS PAYMENT TO:

ADVANCE MARINE SUPPLY CORP.
8388 N.W. 15TH ST.
MIAMI FL 33178

ATC
P.O. BOX 208878
ORLANDO, FLORIDA 32822-8878

\$ 119.20
Debit



1515 S. Federal Highway
Boca Raton, FL 33432-7404

PAGE: 1

ADVANCE MARINE SUPPLY CORP.
8388 N.W. 13TH ST.
MIAMI FL 33172

CUSTOMER NUMBER: 208878
INVOICE NUMBER: 100101742
INVOICE DATE: 07/01/80
SERVICE PERIOD: 06/01/80 - 08/30/80
PRIOR ACCOUNT: 018788

TOTAL AMOUNT DUE: \$36.74

.....

BILLING INQUIRIES AND GENERAL INFORMATION (8AM-5PM, M-F)

IN FLORIDA AND GEORGIA: 1-800-228-8043
OUTSIDE FLORIDA AND GEORGIA: 1-800-432-8043 EXT 3

TECHNICAL INQUIRIES (24 HOURS/DAY 7 DAYS/WEEK)

IN FLORIDA AND GEORGIA: 1-800-228-8040
OUTSIDE FLORIDA AND GEORGIA: 1-800-432-8044

.....

TO HONOR INDUSTRY STANDARDS, ATC HAS ADJUSTED THE
BANDING FOR CERTAIN PRODUCTS BEGINNING WITH YOUR
JULY 1, 1980 BILLING.

PLEASE DETACH AND RETURN LOWER PORTION WITH PAYMENT

17.43

CUSTOMER NUMBER: 208878
INVOICE NUMBER: 100101742
INVOICE DATE: 07/01/80
INVOICE DUE DATE: 08/07/80

TOTAL AMOUNT DUE:	\$36.74
AMOUNT ENCLOSED:	

*PLEASE CHECK BOX TO INDICATE ADDRESS
CHANGE AND ENTER CORRECTION IN REVERSE.

PLEASE ADDRESS PAYMENT TO:

ADVANCE MARINE SUPPLY CORP.
8388 N.W. 13TH ST.
MIAMI FL 33172

ATC
P.O. BOX 838878
ORLANDO, FLORIDA 32882-8878

\$ 23.24
Debit

002055790016 900701 000003674

EXHIBIT _____
(MJD - 31)

EXHIBIT8/24/94
TSI #31 MG

<u>USAGE</u>	<u>AMOUNT DUE</u>	<u>PAYMENT</u>	<u>CREDIT</u>	<u>BALANCE</u>
10/89	\$11,017.98	\$11,017.98	-	0
11/89	\$15,542.02	\$ 7,771.00	-	\$ 7,771.02
12/89	\$16,778.95	\$23,750.20	\$ 799.77	0
1/90	\$22,607.86	\$19,865.92	\$ 2,741.94	0
2/90	\$24,559.38	\$20,875.47	\$ 3,683.91	0
3/90	\$30,700.74	\$24,334.27	\$ 6,366.47	0
4/90	\$31,055.60	-	\$ 6,665.33	\$ 24,390.27
5/90	\$33,228.03	\$48,805.37	\$ 6,000.00	\$ 2,812.93
6/90	\$35,878.00	\$35,532.85	\$ 3,158.08	0
7/90	\$35,773.65	\$71,547.30	-	(35,773.65)
8/90	\$41,670.90	-	-	\$ 5,897.25
9/90	\$40,443.71	-	-	\$ 46,340.96
10/90	\$53,974.35	-	-	\$100,315.31
11/90	\$41,738.40	-	-	\$142,053.71
12/90	\$43,037.86	-	-	\$185,091.57
1/91	\$48,032.36	-	-	\$233,123.93
2/91	\$43,622.15	\$90,000.00	\$21,581.73	\$165,164.35
3/91	\$47,321.15	\$35,000.00	-	\$177,485.55
4/91	\$62,157.08	\$37,890.44	-	
		\$87,321.15		
		\$21,375.85	21,375.85	\$ 93,055.14

EXHIBIT _____
(MJD - 32)

EXHIBIT

8/24 P4
TSI #32 MO

DEDUCTIONS

TSI

ACCT. NAME

DEDUCTIONS

Forms, Etc

\$ 38.06 ✓

Amalgama Trading

\$ 93.88 ✓

Bridgette Lobban

\$ 92.19 ✓

Pilar Tours

\$ 49.58 ✓

El Dorado Furniture

\$ 52.88 ✓

Elite Sales, Inc.

\$ 19.55 ✓

Internt'l Monitary Corp

\$ 5,430.22 Ø 0116 FAX 4/5

} 346.14

ATC ACCOUNTS BILLS INCORRECT

ACCT. NAME

ACCT. #

DEDUCTION

Internt'l Flower Exchange

161103

\$ 1,144.90 DUP

Internt'l Flower Exchange

161103

\$ 2,911.05

D. R. Export

354237

\$ 94.21

Gourmet Bouque

009949

\$ 176.93

Orgin Technologies

343215

\$ 20.95

Advance Marine

205579

\$ 118.20

352850

\$ 1,060.85

First Paragon

210181

\$ 239.75

Jose Alfaro

01-101-159270

\$ 24.62

347228

\$ 24.83

354073

\$ 58.45

01-101-113194

\$ 462.31

network Security

01-101-113194

\$ 1,574.39



<u>ACCT. NAME</u>	<u>ACCT. #</u>	<u>DEDUCTION</u>
First Equity Corp	345285	\$ 258.65
First Equity Corp	345285	\$ 8.59 DUP
InLatin Produce, Inc.	352850	\$ 774.03
Advance Marine	205578	\$ 23.24
Fundamental Management	108212	\$ 81.64
Orgin Technologies	343215	\$ 1.56
	335158	\$ 95.24
	335150	\$ 184.24
TOTAL DEDUCTIONS		\$15,114.99

TOTAL DUES	\$35,878.00
	2,000.00
TOAL DUE	\$37,878.00
DEDUCTIONS	- \$15,114.99
TOTAL DUE AFTER DEDUCTIONS	\$22,763.01

EXHIBIT _____
(MJD - 33)

EXHIBIT

8/24/74
TSI #33 MG

63.92

ADJ			
817.40	344.742	- INGERSOLLI RAD INTL	Bill 817.40
805.19	✓ 340470	- INTER American Press Assoc	805.19
190.06	✓ 341753	- L & M MFR Co-p.	1,734.24
	344721	- Microdot Telcon INC	191.14
507.33	✓ 340460	- Micro Net Communications INC	507.33

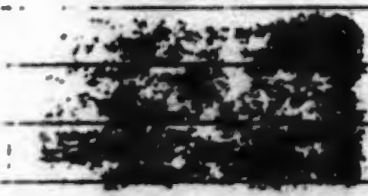


EXHIBIT _____
(MJD - 34)

EXHIBIT

8/24/94
TSI # 34 MS

ATC INTEROFFICE MEMORANDUM

Date: JULY 2, 1990

To: SANDY REEVE
From: MARY JO DAURIO *MD*
Subject: ADJUSTMENTS

.....
PLEASE ISSUE THE FOLLOWING ADJUSTMENTS . THEY ARE THE CLEAN UP OF THE PROBLEM WE HAD WITH T.S.I. BILLING THROUGH OUR SYSTEM INSTEAD OF THE RESELLERS.

ACCOUNT NUMBER	NAME	AMOUNT TO ADJUST
348734	HAWKEYE RADIO	197.61
347228	MIAMI EXPLOSION	62.72
344731	AMALGAMATED TRGE	81.35
344721	MICRONET TELCOM	191.14
342339	ROCA TILE	245.41
344724	INGERSOLL RAND	63.92
161103	INT'L FLOWER	563.97

PLEASE NOTIFY ME WHEN THESE ADJUSTMENTS ARE COMPLETED.

*Sandy did
Dennis did
these adjustments
back in Feb
I would just memo
Mary Jo*

EXHIBIT _____
(MJD - 35)

EXHIBIT

3/24/94
TSI #35 MG

- Domestic Traffic bills customers @ 1 min increments
- Joel should be billed for same calls @ 6 second increments.

8
DIX CONVERSION

#Calls & call min

EXHIBIT _____
(MJD - 36)

DATE	TIME	AREA	CITY	NUMBER	CITY CALLED	AMOUNT	MINUTES	CD	PAGE
0-10	11:13	2	AREA CODE	131	131-572	0.00	0:00		1

DATE	TIME	AREA	CITY	NUMBER	CITY CALLED	AMOUNT	MINUTES	CD	PAGE
0-10	11:13	2	AREA CODE	131	131-572	0.00	0:00		1

DATE	TIME	AREA	CITY	NUMBER	CITY CALLED	AMOUNT	MINUTES	CD	PAGE
0-10	11:13	2	AREA CODE	131	131-572	0.00	0:00		1

0-10/00 RES 113 TYPE 070 CUSTS 332775 1000 7000 CYCLE 10 PAGE 11 OF 12
 TOTAL AMOUNT 107.00 TOTAL MINUTES 24.00

0-10/00 RES 113 TYPE 070 CUSTS 332775 1000 7000 CYCLE 10 PAGE 12 OF 12
 AMOUNT 107.00 MINUTES 24.00

TOTAL NUMBER OF CALLS 49 NUMBER OF MINUTES 107.0 TOTAL AMOUNT 24.00

0-10/00 RES 113 TYPE 001 CUSTS 332775 1000 7000 CYCLE 10 PAGE 1 OF 3

PLEASE PRINT THE NAME OF THE PARTY TO WHOM THE CALL WAS MADE
 NAME OF THE PARTY TO WHOM THE CALL WAS MADE
 ADDRESS OF THE PARTY TO WHOM THE CALL WAS MADE
 CITY AND STATE OF THE PARTY TO WHOM THE CALL WAS MADE

0-10/00 RES 113 TYPE 001 CUSTS 332775 1000 7000 CYCLE 10 PAGE 2 OF 3
 FOR INFORMATION, TELEPHONE COMPANY, P.O. BOX 131-1000
 TAMPA, FLORIDA 33601-1000

2-27-68 RES 104 TYPE 270 CUSTO 270222 1000 0304 CYCLE 17 PAGE 06 OF 20
 201-200-1100

2-27-68 RES 104 TYPE 270 CUSTO 270222 1000 0304 CYCLE 17 PAGE 06 OF 20
 201-200-1100

2-27-68 RES 104 TYPE 270 CUSTO 270222 1000 0304 CYCLE 17 PAGE 07 OF 20
 -----TOTAL-----
 201-200-1100

2-27-68 RES 104 TYPE 270 CUSTO 270222 1000 0304 CYCLE 17 PAGE 08 OF 20
 201-200-1100

TOTAL NUMBER OF CALLS 234 NUMBER OF MINUTES 000.0 TOTAL AMOUNT \$11.00

2-27-68 RES 113 TYPE 231 CUSTO 270222 1000 0307 CYCLE 17 PAGE 1 OF 3

2-27-68 RES 113 TYPE 231 CUSTO 270222 1000 0307 CYCLE 17 PAGE 1 OF 3
 201-200-1100

2-27-68 RES 113 TYPE 231 CUSTO 270222 1000 0307 CYCLE 17 PAGE 2 OF 3
 201-200-1100

2-27-68 RES 113 TYPE 231 CUSTO 270222 1000 0307 CYCLE 17 PAGE 3 OF 3
 201-200-1100

EXHIBIT _____
(MJD - 37)

EXHIBIT

3/24/94
TSI #37 MG

CUSTOMERS BEING BILLED BY ATC

Account Number

Account Name

594 ✓	Florida Minority Regional
158 ✓	Miami Explosion
736 ✓	The Learning Party
593 ✓	Sam L. Hamilton
781 ✓	Bayport Restaurant
526 ✓	Continental Services Inc.
663 ✓	Pan American Hospital
698 ✓	Annevan
537 ✓	The Lead Source
623 ✓	Caritas Lindas
748 ✓	Aqualine
777 ✓	Fred Stolar / Haddon House
557 ✓	Universal Athletics
400 ✓	Lewis Meltzer
331 ✓	Alfaro & Associates
111 ✓	International Flower Exchange
102 ✓	Network Security
721 ✓	Suzy Brewer & Associates
160 ✓	French Explosion
906 ✓	Hammers & Associates
350 ✓	Spacios-
873 ✓	Murray Realities
688 ✓	Life Marketing/ CG Agencies
899 ✓	AFTCO Associates

TELEPHONE SERVICES INC.

594

BUSINESS/ RESIDENT

NEW/ EXISTING/ ACC

DATE OF ORDER: 4/11

COMPANY NAME: by Purchasing Council

ADDRESS: 7900 NE 2nd Ave Suite 202

CITY: MIAMI STATE: FLA ZIP CODE: 33138

CONTACT PERSON: AMILENE LICHTENSTEIN PHONE: (305) 757-6000

SERVICE TYPE: MAX STUXX EST. MONTHLY USAGE: \$200-

HOW MANY LINES: 3

LINES TO BE EQUAL ACCESS WITH:

<u>(305) 757-9690</u>	()
<u>(305) 757-6853</u>	()
<u>(305) 776 (FAX)</u>	()
()	()
()	()

... 455 ...

SERVICE REQUEST: YES NO

... YES NO

2 DIGITS _____ 3 DIGITS _____ 4 DIGITS _____

DOMESTIC DISCOUNT: _____ % TRIP/INT'L FEE: YES NO

... SSN: _____

DATE: 4/11

SALES REP: CARLOS RODRIGUEZ

FOR OFFICE USE ONLY
 Verification of Suit _____
 Spoke to: _____
 Date: _____
 Agreed: YES _____ or NO _____
 Contacted By: _____

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 8-29-91.

Account Name: + Original Regional Purchasing Existing Acct. # 594
Council

Billing Address Change: N/A

Service Address Change: N/A

Phone No. (s) (800) 730-7469 (Add) or (Delete)
() _____ Circle one of the
() _____ the above.
() _____
() _____
() _____
() _____

8/29/91

305-757
9690
4676455
8376

Contact Name (On Original Invoices) (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.



Please circle only "800" number
listed above a.s.a.p for acct.
594.
Thanks.

Order Date: 8-29-91.



12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET


Company: ATC

To: Betty De Simone

FAX #: () _____

From: Cyril

s to follow 2

ase disconnect "800"

number for acct # 594

Thanks

#599

780-7469

ring into

305-757-

522 58690

Cindy 4:30
7/8

T.S.I. SERVICES

BUSINESS / RESIDENTIAL

NEW ORDER / EXISTING

DATE OF ORDER: 10/4/89 ACCT NO. _____

COMPANY NAME: MIAMI EXPLOSION INC.

ADDRESS: 589 NW 28 ST. CITY MIAMI, FL

ZIP CODE: 33127

CONTACT PERSON: Raul MEUDEZ

.....

SERVICE TYPE: MAXIMUM SAVER
ADVANTAGE SERVICE X
CALL AMERICA SERVICE _____
PREMIERE WATS _____

INSTALLATION INFORMATION:

DIALER: YES _____ NO _____ HOW MANY LINES 2
**ATTACH DIALER INSTALL ORDER WITH THIS FORM

EQUAL ACCESS PRESUBSCRIPTION (ATTACH DESIGNATION CARD)

305-576-0220 _____
573-9238 _____

ADDITIONAL SERVICES: PAC CODES: YES X NO _____
3 X 3 _____

.....

TRAVEL SERVICE: YES _____ NO X

AUTH CODE INFORMATION: _____

COMMENTS:

[Handwritten signature and number 158]

1750

TSI Telecommunications Services, Inc.
1221 S.W. 12th Court - Suite 202 - Miami, FL 33136 - (305) 261-2700

MONTHLY SERVICE AGREEMENT

Residing Party **Residence**
NE 9th Ave.
E/A 2211

George Dizon
Primary Service Contact

Access Service
Telephone Number: 947 2090

[Redacted]

Street or P.O. Box Address: *SEMI*

[Redacted]

Business Office
Telephone Number

RELEASE: I am the only person who can be your authority and my request to you is please try to resolve the problem concerning credit standing with your company. Do not write me a copy of your credit report.

List two additional references:
1. Company: *AT&T*
Contact Person: *AT&T*

2. Company: _____
Contact: _____
Telephone: _____

[Redacted]

Service Type: *Premier*

[Redacted]

- The Customer agrees to pay the following amounts:
1. Rates as listed in applicable TSI rate schedules.
 2. Monthly Service Fee \$ *0*
 3. Order Charges \$/Line \$ *0*

[Redacted]

Eq. & Access N V N
Only list the numbers to be utilizing TSI Private Lines or Special Access.
Main Telephone Number: *305 947 2090*

Area Code	Telephone Number	Area Code	Telephone Number
305	945 2434	305	945 2090 ✓
305	945 2434 FAX		
305	945 1352 ✓		

[Redacted]

Yes No
20.00 3 Digits 4 Digits
Codes 1 200 have a monthly fee of \$5.00 per month.

[Redacted]

Choices: 1. _____

OTHER SERVICE REQUESTS

Date of Request: 6/26/91

Account Name: The Learning Party

Account No.: _____

#726

REQUEST:

TO RING AT (605) 947-2090
780-2917

OTHER CODES: _____

HOM
[Redacted area with horizontal lines]

Requested by: _____



TELECOMMUNICATION SERVICES INC.

Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

Betty De Simone

FAX #: () _____

From: Cyndie

Number of pages to follow 2

Please inform _____

following: 1-800-780-2917 ext

Ring to (305) 947-2090 A.S.A.P.

Thanks

re: Learning Party

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 11-14-91.

Account Name: The Learning Party

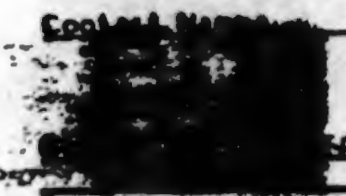
Existing Acct. # 736

Billing Address Changes: CIA

Service Address Changes: N/A

Phone No(s) (Add)	()	<u>780-2917</u>
Telex No(s) (Add)	()	<u>947-2010</u>
	()	_____
	()	_____
	()	_____
	()	_____

11.15.91
 (Add) or (Delete)
 Circle one of the
 the above.



(NEW CONTACT) OR (SAME CONTACT)
 Circle one of the above.

Please cancel this 800 * ASAP.

Thanks.

Order Date:

Order Date: 11-14-91.

MONTH: _____

393

BUSINESS RESIDENTIAL

EXISTING: ACCOUNT: 0

DATE OF ORDER: 4 1 91

COMPANY NAME: Sam L Hamilton

ADDRESS: 3800 NW 23rd Ave

CITY: Miami STATE FL ZIP CODE: 33142

CONTACT PERSON: Margaret Moore PHONE: 305 635 6311

SERVICE TYPE: PREMIERE WATS EST. MONTHLY USAGE: 0

HOW MANY LINES: 8

LINES TO BE EQUAL ACCESS WITH TOLL

305, 633-5211
305, 633-5212
305, 633-5213
305, 633-5214
305, 633-5215

305, 633-5214
305, 634-4402 (FAX)
305, 364-5071

CALLING CARDS: YES NO. OF CARDS _____

800 SERVICE REQUEST: YES NO

2AC. CODES: YES NO

2 DIGITS 3 DIGITS 4 DIGITS

DOMESTIC DISCOUNT: % MONTHLY FEE: YES OR NO

INTANT'L DISCOUNT: %

AUTHORIZED BY: Margaret Moore SSN: 351-4-1012

TITLE: _____

DATE: _____

SAL: _____ Williams

FOR OFFICE USE ONLY

Verification of Switchover

Spoke to: _____

Date: _____

Agreed YES or NO _____

Contacted By: _____

ACCOUNT SUPPLEMENT AND CHANGE

Date of Change: 11-20-91.

Account Name: Sam L Hamilton

Existing Acct. # 593

2. Line Address Number: N/A

Service Address Number: N/A

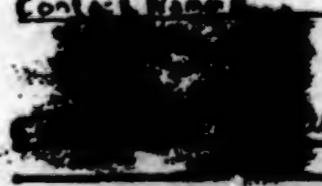
Phone No(s) (x) (35) 633-5218

()	_____
()	_____
()	_____
()	_____
()	_____

(Add) or (Delete)
Circle one of the
the above.

Contact Name: _____

(NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.



add this amt to acct #593

Date Due: _____

Enter Date: 11-20-91.

#593

Add

305

633-5215-
5217

per Riddy

9591

#593

305-633-5218

no Pes

Add

per Cindy

10/10

11-20-91

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 9-5-91

Account Name: Simon & Schuster Existing Acct. # 593

Billing Address Change: n/a

Service Address Change: n/a

9/5/91

No. (s) (s)	Phone #s	
()	<u>633-5215</u>	<input checked="" type="radio"/> (Add) or (Delete) Circle one of the the above.
()	<u>633-5217</u>	
()	_____	
()	_____	
()	_____	

Contact Name: _____ (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

be add these and a.s. i.p.
Thanks.

365-633-511

Sales Dept: _____
Invoice Date: 9-5-91



12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

To: Betty De Simoni

FAX #: () _____

From: Cyndi

Number of pages to follow 2

Please add the 3rd

to meet. # 393 a.s.a.p.

Thanks

re: Sam L. Hamilton

Telephone Service Agreement
 TSPS W 1288 Court - Suite 202 - Lake Park, GA 31506 - 1995 221-2700

MONTHLY SERVICE AGREEMENT

Support Restriction 1 ants

Account Name: 0801 31107500

Street Address: Miami FLA 33161

City: Pine RINCIC

Service Contract: 895-105

Equal Access N Dialer N

Only for the numbers to be utilizing TSI through Dialer or Equal Access

Main Telephone Number: 895-59505

Bank Name: _____

Account Number: _____

We warrant as May Concern This will be your authority and we request you to review any information requested concerning credit status with your company. I hereby further authorize any financial agency of the United States to obtain any information requested concerning credit status with your company.

List two active trade references:

1. Name: _____

Address: _____

Phone Number: _____

2. Name: _____

Address: _____

Phone Number: _____

Name: Don J. Kiriakou Controller 895

2. Name: _____

Sole Proprietor: Partnership:

Internal Use Only

Acct: _____

Sold by: _____

Installation Date: _____

COO: _____

Sales CR: _____

New Acct: Existing Account: If So Acct. # _____

Service Contract: 895-105

Contract: _____

The Customer agrees to pay the following amounts:

- Rates as listed in applicable TSI rate schedule
- Monthly Service Fee \$ 25.00
- Dialer Charges \$/line no \$ 0

Equal Access N Dialer N

Only for the numbers to be utilizing TSI through Dialer or Equal Access

Main Telephone Number: 895-59505

Area Code	Telephone Number	Area Code	Telephone Number
305	895 9505	205	895 4802
305	895 9506	305	895 4820
305	895 9507	305	895 5668
305	895 9508	305	895 5677
305	895 9509	305	895 6208
305	895 2319	305	895 2319

Yes No

2 Digits / 3 Digits / 4 Digits

Circle 1-800 have a restriction fee of \$1.00 per month.

Yes No

Choices: 1. _____

2. _____

3. _____

Phone Number where 800# will ring to: () _____

800 SERVICE 800 / MAJOR INSTALLATION FEE / \$6.00 MONTH

Special Instructions: _____

16-14 Rate

*NO PROTECT CODES ON FAULT

Authorized by: Don J. Kiriakou

Title: Controller

Authorized Signature: _____

Date: 06-26-91

Account Executive: 895

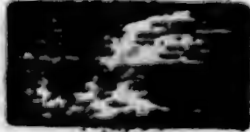
781

Add
305-987-6919
NO PCS

Carlos
8/13

9/1. 9201

61-8778



DATE: 07/11/91
TIME: 10:30:04

SUBSCRIBER ORDER LIST
FROM BELL MIAMI

PAGE: 0021
SEQUENCE NUMBER: 3030

781

031 005 895 9505 200 305 896 9509
BILLING NAME1 : BLUE CRAB CORP
BILLING NAME2 :
BILLING NAME3 :

20 03 031 005 895 9505 200 305 896 9509

ORIG TRANS CODE : 01
ORIG STATUS CODE : 00

BILLING NAME1 : BLUE CRAB CORP
BILLING NAME2 :
BILLING NAME3 :

010712 B 0000000000

910712 B 0000000000

CORSM197

BILLING ADDRESS1 : 10800 BISC BLVD
BILLING ADDRESS2 :
BILLING ADDRESS3 : SUITE 500
BILLING CITY : MIAMI

BILLING ADDRESS1 : 10800 BISC BLVD
BILLING ADDRESS2 :
BILLING ADDRESS3 : SUITE 500
BILLING CITY : MIAMI

Crypt Restaurant

LC ORDER
NUMBER
CORSM197

LC
REF NUM

TERM
NUM-OLD

0000000000

07/12/91

07/12/91

07/12/91

07/12/91

07/12/91

07/12/91

07/12/91

07/12/91

07/12/91

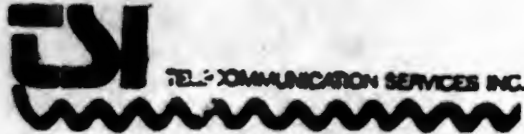
07/12/91

07/12/91

07/12/91

07/12/91

07/12/91



TELECOMMUNICATION SERVICES INC.

Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3585

FAX COVER SHEET

Company: ATC

To: Bobby De Simone

FAX #: () _____

From: Cyndi

Number of pages to follow 2

~~Comments~~ please add and delete

the following axis a.s.a.p. -

Thanks

acct # 781

6/8/91

ACCOUNT SUPPLEMENT AND CHANGE

Date of Change: 8/9/91

ACCOUNT NAME: Bayport Restaurant Group Existing Acct. # 781

BILLING ADDRESS CHANGE: 4600 Hollywood Blvd. #695
Hollywood, Fla. 33021

SERVICE ADDRESS CHANGE: _____

Phone No. (Area) 305 981-9701 (Add) or (Delete)
() _____ Circle one of the
() _____ the above.
(305) 981-9707 None
() _____
() _____

Contact Name: Dave J. Kinncie (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above
[Redacted] _____

Bill Date: 8/9/91
Invoice Date: 8/9/91

7/9
8/1

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 7/9/91

Account Name: LYFORD RESTAURANT GROUP Existing Acct. # _____

Billing Address Changes: N/A

Address Changes: N/A

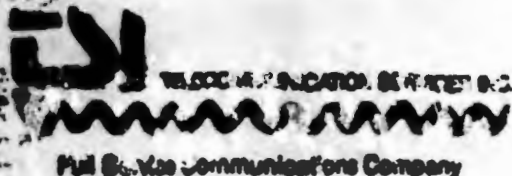
Not ()	205	593-5171	Delete
()	205	875-2166	by use of the
()	205	875-2222	above.
()			
()			
()			

JR

CONTACT NAME: _____ (NEW CONTACT) OR _____
 Circle or _____

Sales Rep: None

Invoice Date: 7/9/91



12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565


FAX COVER SHEET


Company: ATC

To: Betty (aid)

From: 1

From: Cyrdi

 pages to follow 2

 please add the following

aria to this account: Bayport

Restaurant (which was not on

account)

Thank you

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 8-01-91.

Account Name: Bayport Restaurants Extension Acct. # 781

*829/181
7/11/92*

Billing Address Change: N/A

Service Address Change: N/A

	<u>WITH PAC'S</u>	<u>3ACT</u>	<u>NO PE</u>
Phone No. (s):	() <u>967-6700 ✓</u>	(Add) or (Delete)	<u>981-</u>
	() <u>967-6701 ✓</u>	Circle one of the	<u>961-</u>
	() <u>967-6702 ✓</u>	the above.	<u>981-7776</u>
	() <u>6703 ✓</u>		<u>981-9115</u>
	() <u>6704 ✓</u>		<u>981-9117</u>
	() <u>6705 ✓</u>		<u>981-9207</u>
	() <u>6706 ✓</u>	(NEW CONTACT) OR (SAME CONTACT)	
	() <u>6707 ✓</u>	Circle one of the above.	
	() <u>6708 ✓</u>		



use add all units listed on
station with PAC'S or other no PAC'S

8-01-91.

TSI

FAX COVER SHEET

12221 SW 129TH CT.
SUITE 4200
MIAMI, FLORIDA 33186
(305) 251-2700

AK

by R Simone

OF PAGES INCLUDING COVER SHEET 2

6

add all of these ones

500

Thanks



526
913

get 2/13

TELECOMMUNICATION SERVICES INC.
MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING ACCOUNT: 8

DATE OF ORDER: 2/13/91
COMPANY NAME: COMMUNITE SERVICES GROUP INC.
ADDRESS: 1726 L.W. SM ST.
CITY: MIRAL STATE: FLA ZIP CODE: 33122
CONTACT PERSON: LARRY FERRIS PHONE: (407) 409-435
SERVICE TYPE: FACSIMILE 4-PTS. EST. MONTHLY USAGE: 200
HOW MANY LINES: 1

LINES TO BE EQUAL ACCESS WITH TOLL

<u>(30)</u>	<u>633-2770</u>	<u>()</u>
<u>()</u>	<u>()</u>	<u>()</u>
<u>()</u>	<u>()</u>	<u>()</u>
<u>()</u>	<u>()</u>	<u>()</u>
<u>()</u>	<u>()</u>	<u>()</u>

CALLING CARDS: YES NO. OF CARDS: 1 - office

800 SERVICE NUMBER: YES OR NO (NO)

110 409-435

PAC CODES: YES (NO)

2 DIGITS 3 DIGITS 4 DIGITS

DOMESTIC DISCOUNT: X MONTHLY FEE: YES OR NO (NO)
INTERNATIONAL DISCOUNT: X

AUTHORIZED BY: Larry Ferris SIGN: _____

TITLE: ADM ASST.

DATE: 2/13/91

SALES REP: Orlando Rodriguez

FOR OFFICE USE ONLY
Verification of Switchover
Spoke to: _____
Date: _____
Agreed: YES OR NO _____
Contacted By: _____

*ok 2/28
ok 5/14
ok 8/14
ok 11/14
only*

(AIR COVER SHEET)

121
12271 B-129111 S1.
SUITE 2200
21071, FLD: 180 2418.
1201 231-2700

To: Betty Desjardis

Company: ATC

Fo. No.: 362-8115

Number of Pages including cover sheet 3

From: DU

Date: 2/13/71

Comments: Implement new order.

Continental

526

MEMBER BIRTH DEATH AND MARRIAGES

Date of Change: 2/15/01

Account Name: Contractor Services Group Existing Acct. # _____

Building Address Change: N/A

Phone and fax Change: N/A

2 Discs

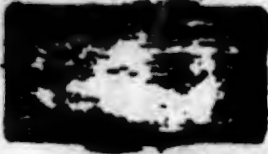
- Mr. [Name], Tel. 631-7700 ✓
- Mr. [Name], Tel. [Number] ✓
- Mr. [Name], Tel. [Number] ✓
- Mr. [Name], Tel. [Number] ✓
- Mr. [Name], Tel. [Number] ✓
- Mr. [Name], Tel. [Number] ✓

(Add) or (Delete) circle one of the above.

Members: Union fees ... (Add) or (Delete) circle one of the above.

Comments: Please call all these cards to
the office.

By: [Signature]
Date: 2/15/01



MTB

jel
5/13/91
5:25
jel
solin

305-633-
7707

no PC's (AA+)
no PC's

acoh #
#526



OTHER SERVICE REQUESTS

Date of Request: 12-14-91

A. Court Name: Criminal Services Group

A. C. J. S. No.: 520

REQUEST:

TO RING AT ()

OFF CODES: Yes

Tut
[Redacted] 55863 133
[Redacted] 92333 784
[Redacted] 93872 288
[Redacted] 77236 916
[Redacted] 226124 916
[Redacted] 213527 916
[Redacted] 22722 359
TRAIL
TRAP
9 tubes
Requested by: Cindi (Lauer)

663

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/RESIDENTIAL

NEW SERVICE ACCOUNT

DATE OF ORDER: 5/14/91

COMPANY NAME: PAN AMERICAN HOSPITAL

ADDRESS: 5969 N.W. 7 ST

CITY: MIAMI STATE: FL

CONTACT PERSON: MAICELINE TERRY

SERVICE TYPE: PHONE LINES

NUMBER OF LINES: 55

LIST TO BE ORDERED SEPARATELY WITH THIS

<input type="checkbox"/>	<u>SEE ATTACHED LISTS</u>
<input type="checkbox"/>	<u>ALL THE 'S' AND (S) ARE</u>
<input type="checkbox"/>	
<input type="checkbox"/>	

PAC SERVICE: YES NO

NOT ONE PAY LINE

2 DIGITS 3 DIGITS 4 DIGITS

AUTHORIZED BY: [Signature]

TITLE: Purchasing Manager

PRINT NAME: MAICELINE TERRY

DATE: 5/14/91

PANAMERICAN HOSPITAL

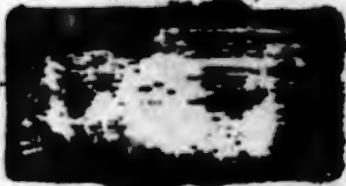
PHONE NO.	RESPONSIBLE PARTY	LOCATION
264-4822 ✓	PANA	PAN
264-9546 ✓	FAX LINE (EMERGENCY ROOM)	PAN
264-8888	HOSTESS RECORDS DEPT	PAN
264-1688	HOSTESS RECORDS DEPT	PAN
264-4588 ✓	BUS.OFFICE	PAN
266-2212 ✓	I.C.U.	PAN
266-8615 ✓	EMERGENCY ROOM	PAN
266-4628 ✓	PURCHASING DEPT	PAN
266-4897 ✓	ADMINISTRATION	PAN
266-2212
266-2212
267-5267 ✓	MARKETING (ENROLLMENTS)	NETWORK
267-5268 ✓	MARKETING (ENROLLMENTS)	NETWORK
267-5269 ✓	MARKETING (ENROLLMENTS)	NETWORK
267-5269	CASE MANAGEMENT (WITH CASE)	PAN
267-5269	CASE MANAGEMENT (FAX LINE)	PAN
267-9246 ✓	701 W. 5TH AVE	
442-3637 ✓	HOME HEALTH 3040 N.W. 7 ST	
442-4978 ✓		
442-4979 ✓		
442-4149 ✓		
442-2088 ✓	HEALTH 3040 N.W. 7 ST	
442-2088		

ATT: *Amelia Padua*



PAN AMERICAN HOSPITAL

PHONE NO.	RESPONSIBLE PARTY	LOCATION
261-0700	EMERGENCY ROOM	PAN
261-2442	P.B.X	PAN
261-8843	C. CALDERIN	PAN
261-8180	BUS. OFF - TELETYPE JACKSONVILLE	PAN
261-2662	ADMINISTRATION	PAN
261-5416	X-RAYS (PAMA)	PAN
261-3693	X-RAYS (PAMA)	PAN
261-7980	LABORATORY	PAN
261-7409	LABORATORY	PAN
261-6623	MARKETING (701 N.W. 57 AVE)	NETWORK
261-9193	ROBEY SCHEDULING	PAN
261-9293	LAZARUS (ONCOLOGY CTR)	PAN
261-6218	EMERGENCY ROOM	PAN
261-9896	PHARMACY FAX LINE	PAN
261-9386	OUT PAT FAX LINE	PAN
261-9412	LABORATORY FAX LINE	PAN
261-1908	PHARMACY FAX	PAN
261-2273	EMERGENCY ROOM	PAN
262-2169	E.R.G DOCTORS	PAN
262-2169	BUS. OFFICE	PAN
262-4293	PHARMACOLOGICAL RESEARCH 701/57 AVE	NETWORK
262-5677	PHARMACOLOGICAL RESEARCH	NETWORK
264-9070	LANE	PAN
264-9070	CARRIERS OFFICE	PAN
264-9513	DATA PROCESSING	PAN
264-9546	FAX LINE LAB TO E.R.	PAN
264-1080	DR. VILLY (LABORATORY)	PAN
264-8073	S. PEREA (BUS. OFFICE)	PAN
264-4603	PAN	PAN
264-4791	PAN	PAN
264-4822	PAN	PAN
264-5033	PAN	PAN
264-4603	PAN	PAN
264-4791	PAN	PAN



#663

Dele 305-261-5416
Dele 261 5693

PER Cindy

7.30.91

9:30 A.M.



DATE : 07/24/71
TIME : 09:00:55 AM

FRONT END COSTS
** ERROR REPORT **

REPORT : TOSR702
PAGE : 011

UNION CUSTOM BINDER

0 LIC. TAPE TEN YCALL YALL
0 DATE SER SEQUENCE DATE TIME

91/05/71 2 9221 91/05/71 16730

30 NO AUTH CODE FILE MATCH

91/07/71 2 9799 91/07/71 17150

30 NO AUTH CODE FILE MATCH

91/07/71 2 3209 91/07/71 09130

30 NO AUTH CODE FILE MATCH

91/07/71 2 4609 91/07/71 14010

30 NO AUTH CODE FILE MATCH

91/07/71 2 5033 91/07/71 11300

30 NO AUTH CODE FILE MATCH

91/07/71 2 5277 91/07/71 11795

30 NO AUTH CODE FILE MATCH

91/07/71 2 8087 91/07/71 15012

30 NO AUTH CODE FILE MATCH

91/07/71 2 8159 91/07/71 15120

30 NO AUTH CODE FILE MATCH

91/07/71 2 8275 91/07/71 15230

30 NO AUTH CODE FILE MATCH

91/07/71 2 9170 91/07/71 16120

30 NO AUTH CODE FILE MATCH

ACCOUNT SUPPLEMENT AND NUMBER

Ref. of Change: W-12-91

Client Name: Am. American

Relation Acc. L. 003

Address Change

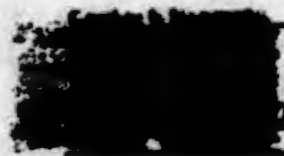
Service Address Change

- 267-2182
- 267-2183
- 267-2184
- _____
- _____
- _____

(Add) (Delete)
Circle one of the
the above.

Telus

12.12.91



NEW CONTACTS OR ISNT CONTACT:
Circle one of the above.

we add these as AP

12-12-91

ACCOUNT SUPPLEMENT AND CHANGE

Date of Change: 12-11-71

Account Name: Pro American Hospital Reliance Acct. # 123

Billing Address Name: _____

Service Address Name: _____

by Mail 267-2181

(Add) or (Delete)
Circle one of the
the above.

12-11-71

*In
Telus*



(NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Please add this one ASAP

_____ 12-11-71

#663

305-261-2662 FAX

take out P.C.'s

OK
P.C. only
6.13.91



TELEPHONE SERVICE

MONTHLY SERVICE AGREEMENT

Service #

ANNEVAN CO
7228 NW 5
MIAMI FL 33142
253 2332

Billing Address

Same

PO Box Address

Area Code 305
Number 803 7332

Area Code 305
Number 803 6168

Area Code 305
Number 803 2971

Area Code 305
Number 803 2971

Area Code 305
Number 803 2971

Area Code 305
Number 803 2971

Area Code 305
Number 803 2971

Service #

UM SAVE

SAVE \$600

Country Service Fee \$

Local Charges \$

Equal Access N Clear Y E

Only list the number to be using TSI through Co. 17 Spal Area
Main Telephone Number: **803 7332**

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
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Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

Area Code 305
Number 803 7332

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 7-24-91

Account Name: [REDACTED] Existing Acc: 8

Bill To: SA. Spencer

Service Address Street: 116

Circle one (Add) or (Delete) (Add)
Circle one of the above.
9/9/91
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Contact Name: [REDACTED] (NEW CONTACT) OR (SALE)
Circle one of the above.

Will be 2. 2. right SAC
THANKS
THANKS

Sales Date: _____

Sales Date: 9-18-91

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 7-2-71

Account Names W. H. ...

Existing Acc' 8

Phone No. Changes 1 14

Service Address Changes 712

<u>9/9/91</u>	()	<u>5-12-75</u>	(Add) or (Delete)
	()	_____	Circle one of the
	()	_____	the above.
	()	_____	
	()	_____	
	()	_____	

Contact Name: [Redacted] (NEW CONTACT) OR (SAME) Circle one of the above

the date the 2-digit SAC
10-0445 A SAP
Thanks

Sales Date: _____
Index Date: 9-18-91

TELECOMMUNICATIONS INC. # 623
NO. 1011 224 AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING/ ACCOUNT:

DATE OF ORDER: _____

COMPANY NAME: _____

ADDRESS: _____

CITY: _____ STA _____ ZIP CODE: _____

CONTACT PERSON: _____ PHONE # (____) _____

SERVICE TYPE: _____ EST. MONTHLY USAGE: 0.30

HOW MANY LINES: 4

LINES TO BE EQUAL ACCESS WITH TOLL

() _____	() _____
() <u>356-3879</u>	() _____
() <u>356-9865</u>	() _____
() <u>356-0495</u>	() _____
() _____	() _____

CALLING CARDS: YES NO NO. OF CARDS 3

SERVICE RESULTS: RI _____ OR NO _____

C. CODES: YES NO

2 DIGITS 3 DIGITS _____ 4 DIGITS _____

DOMESTIC DISCOUNT: _____ % MINIM. FEE: YES OR NO
INTERN'L DISCOUNT: 15 %

AUTHORIZED BY: Mycas. Wres SSN: 267-11-??

TITLE: _____

DATE: _____

SALES REP: W.C.A. Wres

FOR OFFICE USE ONLY
Verification of Suitenc
Spoke to: _____
Date: _____
Agreed: YES or NO
Contacted By: _____

CS

Service Address

ME Inc.
SW 126 Av

FL

31-1101

Service Type

None

Location
Bank

Product

SSB

Type of Company

Fed ID # 23-35375

Sole Proprietorship Partnership

Internal Use Only

Account

Sold by

Installation Date

COD

Sales ON

New Account Existing Account No Ass 0

TELEPHONE SERVICE AGREEMENT

Service Type

Product Summary

PROVISION

Telephone Number (Area Code) 31-1101

Area Code	Telephone Number	Area Code	Telephone Number
31	1278 TA		
31	0142		
31	1121		

Product Features

Yes No
3 Digit 3 Digit

300 Service

Yes No

Product 1
2
3

Usage 12

read by

Authorized Signature

Date 12-97
Account Executive [Signature]

Small print text at the bottom of the agreement page.

Handwritten: 1-12-92

ACCOUNT SUPPLEMENT AND CHANGE

Date of Change: 1-27-92

Account Name: Fred Solar / Hacienda House

Relating Acct. # 777

Billing Address Change: N/A

Service Address Change: N/A

<u>Phone No(s) (07)</u>	<u>851-1532</u>
(4)	<u>851-2164</u>
()	_____
()	_____
()	_____
()	_____

(Add) or (Delete)
Circle one of the
the above.

Handwritten: 366733-457
503414-07/A

Handwritten: 1/27/92

Contact Name: _____ (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Handwritten: Please disconnect account by wed 29th
and disconnect outcalls ASAP.
Thanks

Handwritten: (per customer's request)

1-27-92

RED SOLAR / INDOOR ...
 7000 LAKE ELLERRE #12
 ORLANDO FL 32812
 Building

[Signature]

Account Name: **Sun Bank ...**
 Telephone: ...

... to whom the ...

1. Call Name: ...
 Contact Person: ...
 Telephone Number: ...

2. Call Name: ...
 Contact Person: ...
 Telephone Number: ...

Name: **Excel ...** 888

Type of Company: Corporation
 Fed. ID #: ...
 Sole Proprietorship:

Internal Use Only
 Sold by: ...
 COO: ...
 Sales: ...

Primer WPIS

1. ...
 2. ...
 3. ...

Area Code: 407
 Telephone Number: 8512164
 Main Telephone Number: 407 8512164

Area Code	Telephone Number	Area Code	Telephone Number
407	8512164		
407	8512164		

Yes No
 2 Cops 3 Cops

Checked: 1 **2000 ...**

Special Instructions: **SOLD UNDER ...**
2 TRUCK PARTS

Authorized by: *[Signature]*
 Title: ...
 Date: ...



1515 South Federal Highway
Suite 400
Boca Raton, FL 33432-7404
(407) 392-2244

June 6, 1990

Telecommunication Services Inc.
14869 S.W. 104th Street
Suite 1400
Miami, Florida 33196

Dear Joel,

Attached you will find the statement for services for the period April 1, 1990 thru April 30, 1990 in the amount of \$31,055.60. According to your agreement with TELUS 500 is due in fifteen days and the balance in thirty days.

In addition our records indicate that we have not yet received payment on the March invoice in the amount of \$30,700.74. Please contact me immediately regarding this matter.

Payment should be made to ATC and mailed to my attention to:

1515 South Federal Hwy
4th Floor, Room 4022
Boca Raton, Florida 33432

If you have any questions please feel free to call me at (407) 750-2720.

Sincerely,

Mary Jo Daurio

TELECOM SERVICES
PERIOD 04/01/90 THRU 04/30/90

CATEGORY	CALLS	MINUTES	COST	AMT DUE
INTERNATIONAL	4,702	17,443.9		14,262.37
TRAVEL SVC	201	1,429.0	.198	279.00
INBOUND 800	18	122.0	.21	25.62
INTRALATA	4,129	11,156.0	.12	1,338.72
INTRASTATE	4,040	12,089.7	.125	1,511.21
ON NET	19,312	59,818.8	.14	8,374.63
OFF NET	13,882	35,096.1	.18	5,284.42
TOTALS	48,082	137,156.3		31,055.60

AMOUNT DUE

\$ 31,055.60

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING ACCOUNT:

DATE OF ORDER: 3/11/91

NAME: WILLIAMS AKA: _____

ADDRESS: 14 NW 25th St

CITY: Miami STATE: FLA ZIP CODE: 33127

CONTACT PERSON: JOSE UGARTE PHONE #. (305) 872-514

SERVICE TYPE: PREMIER LATS EST. MONTHLY USAGE: 0

HOW MANY LINES: 5

LINES TO BE EQUAL ACCESS WITH TOLL

- (305) 573-5142 / ()
- (305) 573-2149 / ()
- (305) 573-6243 / ()
- (305) 573-8302 / (FAX) ()
- (305) 576-3723 / ()

CALLING CARDS: YES NO. OF CARDS 3-3 - OFFICE WITH TOLL

800 SERVICE REQUEST: YES OR NO NO ACCESS 857842-478

TAC CODES: YES NO 246312-431

2 DIGIT: 2 DIGITS 1 DIGIT: _____ 0700756-474

DOMESTIC DISCOUNT: 2 MONTHLY FEE: YES OR NO NO

AUTHORIZED BY: [Signature] FEB 10: 55-1790484

TITLE: Sales Man

DATE: 3/11/91

SALES REP: CARLOS A. RODRIGUEZ

FOR OFFICE USE ONLY
 Verification of Switchover
 Spoke Tel: De Ugar
 Date: 3/11/91
 Agreement YES or NO
 Center: Code 1310

CH 2-3-12-41
 COD: 3-15-91

Willie Ekt 2106

Added to 582

305-576-3723

PER Joel

4.10.91

Ad

305-576-5082
5085



all the
Acct
Per Daisy
~~#331~~
el #13



9/9
355216-282

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS / RESIDENTIAL

NEW / EXISTING ACCOUNT

DATE OF ORDER: 7/10/90

COMPANY NAME: Alfano Associates

ADDRESS: 1112 5th St

CITY: Miami STATE: FL ZIP CODE: 33174

CONTACT PERSON: Isabel Alfano PHONE: (305) 553-6991

SERVICE TYPE: Residential with EXT. MONTHLY USAGE: 0.50

HOW MANY LINES: 1

#331

LINES TO BE SERIAL ORDERED WITH THIS

(305) 553-6991	()
(305) 223-3292	()
()	()
()	()
()	()

SPECIAL INSTRUCTIONS:

PAC CODES: YES NO

2 DIGITS _____ 3 DIGITS _____ 4 DIGITS _____

AUTHORIZED BY: X

TITLE: Owner

PRINT NAME: ISABEL ALFANO

DATE: 7/10/90

SALES REP: Isabel Alfano

ACCOUNTS SETTLEMENT AND LIABILITIES

Date of Change 1/1/51

Account Number 1111111111

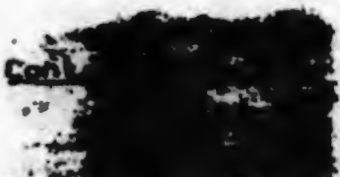
Existing Acct. # 1111

Bill to Address Change _____

Invoice Address Change _____

Product No. () SS3
() _____
() _____
() _____
() _____
() _____

(Add) or (Delete)
Circle one of the
the above.



(NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Comments discuss the
addition of

Sales Rep Pedro

Today's Date 12/1/50

T.S.I. SERVICES

BUSINESS / RESIDENTIAL

NEW ORDER / EXISTING

ORDER: 11/8/82

ACCT NO. _____

BY: INTERNATIONAL TOWER EXCHANGE, INC.

470 NW 79 AVE CITY MIAMI, FL 33126

AREA: 33126

CONTACT PERSON: RICK TAUREGUI

PLAN TYPE:

MAXIMUM SAVER _____

ADVANTAGE SERVICE _____

CALL AMERICA SERVICE _____

PREMIERE WATS X

INSTALLATION INFORMATION:

WALKER: ES

NO X

HOW MANY LINES (18)

ATTACH WALKER INSTALL ORDER WITH THIS FORM

EQUAL ACCESS PRESUBSCRIPTION (ATTACH DESIGNATION CARD)

594-4954 ✓ 591-8664 ✓ 74-0337 ✓ 594-5654 ✓
361-127 ✓ 591-8832 ✓ 594-0378 ✓ 594-5913 ✓
477-405 ✓ 591-4293 ✓ 594-4907 ✓ 594-5966 ✓
477-9131 ✓ 592-3265 ✓ 594-1981 ✓ 594-7584 ✓
591-4366 ✓ 591-975 ✓ (477-9663) ✓
591-4373 ✓

ADDRESS

PAC CODES: YES X NO _____

TRIP

YES _____ NO X

AUTH CODE

#100

TO: Betty Desimone
FROM: Esquerqui (TS) (Fax 1/3/72)

Dear Betty

Best and Happy New Year.

Will assist me in making some
arrangements to International Finance & Ex-
isting account #111.

Have requested to delete
feature off from the

305-477-7663-537

Also claim that people not getting
the feature on all over ANIS
account.

- Also check and see the following
- 305-590-591-0759
 - 361-592-3265
 - 477-591-4293
 - 477-594-0333
 - 477-594-0338
 - 591-4366
 - 594-4991
 - 591-4344
 - 594-5692
 - 591-5777
 - 594-5936

All of the
or the
Thank you
LMA

TO: Betty De Simone
FROM: Joel Esquivel

Hi Betty;

NATIONAL FLOWER EXCHANGE, ANGELES
RECENTLY TURNED IN TO YOU, HAS
A FEW REQUEST.

They would like to add 2 DIGIT
PAC TO ONE OF THEIR FAX
LINE. THIS FAX LINE TO HAVE PAC
IS 305-477-9131 ✓

ALSO THE LINE 305-592-3265 ✓ WAS
SUBMITTED TO YOU AS A REGULAR LINE, AND
IT'S A FAX LINE. PLEASE ASSIST ME
IN THIS CASE. THESE MISTAKES. PLEASE
PROPER PORTION FOR FAX LINE

THANKING YOU IN ADVANCE

Respectfully
Joel

EQUAL ACCESS

Phone numbers added to Equal Access:

- | | | | |
|---------------------|---------------------|----------------------|----------------------|
| 1. [305-594-4954] ✓ | 5. [305-591-4297] ✓ | 9. [305-591-8694] ✓ | 13. [305-594-0337] ✓ |
| 2. [305-361-1272] ✓ | 6. [305-591-4366] ✓ | 10. [305-591-8832] ✓ | 14. [305-594-0338] ✓ |
| 3. [305-477-4052] ✓ | 7. [305-591-4373] ✓ | 11. [305-591-9560] ✓ | 15. [305-594-4955] ✓ |
| 4. [305-477-9131] ✓ | 8. [305-591-8664] ✓ | 12. [305-591-9759] ✓ | 16. [305-594-4961] ✓ |
- ✓ 17. [305-594-5624] ✓
 18. [305-594-5913] ✓
 19. [305-594-5966] ✓
 20. [305-594-7585] ✓

no dialer

RICK

*INTERNATIONAL FLOWER EXCHANGE
Inc.*

*1470 NW 79 AVE.
MIAMI, FL 33126*

E/A.

None ordered []
 Casual Usage Yes [] No [x]
 International Yes [x] No []

*599-4100 ✓ PMS
599-2828 ✓ PMS*

Maximum Sales

*All right
2/1/85*

*Cancel
out
10/11*

///

988

DATE FOR SHIP

ACCOUNT NO: TELECOM SVC NAME OF CO: International Flower CONTACT: Man

This account is strictly P.A. ANI's are listed below

#111

305- 594-4934 ✓ 361-1272 ✓ 477-4052 ✓ 477-9131 ✓ 591-4297 ✓ 591-4366 ✓ 591-4373 ✓

591-8664 ✓ 591-8694 ✓ 591-8832 ✓ 591-9560 ✓ 591-9759 ✓ 594-0337 ✓ 594-0338 ✓

594-4955 ✓ 594-4981 ✓ 594-5654 ✓ 594-5913 ✓ 594-5966 ✓ 594-7585 ✓

Computer: 477-7542 ✓ 477-7685 ✓

Lined area for additional entries, mostly blank with some ink smudges at the bottom.

THIS LONG DISTANCE DESIGNATION CARD

Yes, I want to designate Telus Communications, Inc. as my "Main Long Distance Carrier" and authorize them to switch all the numbers I have listed to Telus through my local phone company.

Customer # 2111
Sales/Rep _____
Conversion Date _____ Index _____
CCL _____

Pri. _____ Sec. _____

Fact Yes _____ No _____

MSD-19-10M/7/89 Rev.

Please fill out information below:

Name/Title BERNARD STAREBU
Company INTER. FLOWER EXCHANGE
Address 1470 N.W. 79th AVE
City MIAMI
State FL Zip 33126
Main billing phone # 305 594-4954
Additional phone # SEE ATTACHED

Signature [Signature] Date 11/1/89



I.F.E. TELEPHONE LINES



- | | |
|-----------------------|-------------------------------|
| 1. 305-594-4954 | 12. 305-591-9759 |
| 2. 305-361-1272 - ROL | 13. 305-594-8337 |
| 3. 305-477-4852 - FAX | 14. 305-594-8338 |
| 4. 305-477-9131 - FAX | 15. 305-594-4955 |
| 5. 305-591-4297 | 16. 305-594-4981 |
| 6. 305-591-4386 | 17. X 305-477-7542 - COMPUTER |
| 7. 305-591-4373 | 18. 305-477-7663 - COMPUTER |
| 8. 305-591-8664 | 19. 305-594-5654 |
| ca 9. X 305-591-8694 | 20. 305-594-5913 |
| 10. 305-591-8832 | 21. 305-594-5966 |
| ca 11. X 305-591-9568 | ca 22. X 305-594-7585 |

23. 305-599-4188 - POC
24. 305-599-2828 - POC

INTL FORERY EXCHANGE.

2 DIGIT ACCOUNTING CODE

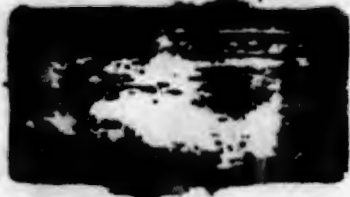


Betty, I forgot; on this same
account, they should be billed under
TSI's Premier WATS Service, but are
being billed under the maximum service
choice. # 913 from 910.

Can you assist me in correcting this?

ONCE AGAIN

Thank you
Luf



W

INT'L Flower

780-⁶⁰⁰⁰~~7673~~ Ched May '90

305-594-4981



DISCOUNT LONG DISTANCE SERVICE DESIGNATION CARD

TELUS

Yes, I want to designate Telus Communications, Inc. as my "Main Long Distance Carrier" and authorize them to act as my agent and make arrangements with my local phone company to make the connections necessary so that long distance calls will be automatically routed to Telus. I understand that when service begins, I will not have to dial any extra digits to use my Telus service.

Signature [Signature] Date 8/14

Customer # TELUSAM SVCS

Conversion Date _____

Index Number _____

Rep. Stacy

MSO-16-04W 5/89 rev.

Please fill out information below:

Name/Title: HEARLY LOKIE

Company: NETWORK SECURITY

Address: 1045 NW 36 ST SUITE 50

City: Miami

State: FL Zip: 33166

Telephone: 305-594-2121

Please list telephone numbers to be connected to Telus 'One Plus' Dialing Service. NO PAC

✓ 594-2121, 594-2867

594-3836, 594-6614

594-6058, -FAX

CALL 477-4831
8/22



ed
2/25/91

305

4
94

308

Current Market
Co.

F.B.I. SERVICE

RESIDENTIAL NEW ORDER EXISTING

DATE 11/24/89 ACCT NO. 102

SERVICE NETWORK SECURITY

ADDRESS 2045 NW 36 ST. SUITE 2532 CITY MIAMI

PHONE NUMBER 3366

CONTACT PERSON: HENRY LOUIS

SERVICE TYPE

MAXIMUM SAVER
ADVANTAGE SERVICE
CALL AMERICA SERVICE
PREMIERE WATS

X

#102

INSTALLATION INFORMATION

DI YES X NO _____ HOW MANY LINES 7
EACH DEALER INSTALL ORDER WITH THIS FORM

PRESUBSCRIPTION (ATTACH DESIGNATION CARD)

594-2867 593-6087-FA

594 4
47 477-4631

CALL SERVICE

YES: X Y

TELEPHONE SERVICE

NO X

TELEPHONE CODE INFO

70
IS AN
595
6, 456
1987
11/24
11/24
11/24
11/24

T.S.I. SERVICES

BUSINESS / RESIDENTIAL

NEW ORDER / EXISTING

DATE OF ORDER: 3/29/90.

ACCT NO. 102

COMPANY NAME: NETWORK SECURITY.

ADDRESS: 8045 NW 365. # 532 CITY MIAMI, FL.

ZIP CODE: _____

CONTACT PERSON: HENRY LOUIS.

SERVICE TYPE:

- MAXIMUM SAVER
- ADVANTAGE SERVICE
- CALL AMERICA SERVICE
- PREMIERE WATS

X

INSTALLATION INFORMATION:

DIALER: YES _____

NO X

HOW MANY LINES

(1)

**ATTACH DIALER INSTALL. ORDER WITH THIS FORM

EQUAL ACCESS PRESUBSCRIPTION (ATTACH DESIGNATION CARD)

(305) 594-0714 Computer Line.

ADDITIONAL SERVICES:

PAC CODES:

YES _____

NO X

2 _____ 3 _____ 4 _____

TRAVEL SERVICE:

YES _____

NO X

AUTH CODE INFORMATION:

COMMERCIAL

PLEASE ADD THIS NEW ADD TO HIS EXISTING ACCOUNT. PLEASE NOTE THAT'S A COMPUTER LINE, NOT TO BE IMPLEMENTED IN ITS PROPER.

Handwritten: 12/11/89, 12-11-89, #102

DISPATCH - CALLS GOING THRU WITHOUT CODES

T.S.I. SERVICES

BUSINESS / RESIDENTIAL NEW ORDER EXISTING

DATE OF ORDER: 11/22/89 ACCT NO. 102

COMPANY NAME: NETWORK SECURITY.

ADDRESS: 8045 NW 36 ST. SUITE #532 MIAMI, FL

ZIP CODE: 33166

CONTACT PERSON: HENRY LORIE. NANCY

SERVICE TYPE: MAXIMUM SAVER (X), ADVANTAGE SERVICE, CALL AMERICA SERVICE, PREMIERE WATS

INSTALLATION INFORMATION:

DIALER: YES (X) NO HOW MANY LINES 7

EQUAL ACCESS PRESUBSCRIPTION (ATTACH DESIGNATION CARD) FAX 2 Digit

- Handwritten list of phone numbers: 305-594-2121, 594-2867, 594-3836, 594-664, 477-4631, 470-2396

Handwritten notes: 601816, 57889

ADDITIONAL SERVICES: YES (X) NO

Reported Trouble to phone no. 1-214-484-8767 has access TRAVEL SERVICE: YES NO

AUTH CODE INFORMATION:

The K73 2754 1149 was captured at location... Line 5 was captured from the line...

COMMENTS: This is an existing account that has... DIALERS DUE TO THE HEAVY INTRATA CHARGES. PLEASE INSTANT DIALER ON ALL THE LINES EXCEPT THE FAX LINE. PLEASE PROVIDE...

102

NAME: W. J. ...
ADDRESS: ...

Joe ¹⁰ *ACK*

SEX: ...

TYPE:

MAXIMUM SAVER
ADVANTAGE SERVICE
CALL AMERICA SERVICE
PREMIERE WATS

ADDITIONAL INFORMATION:

DO YOU WANT TO ORDER WITH THIS FORM? YES NO HOW MANY LINES 1

ATTACH DESIGNATION: _____

TELEPHONE SERVICE:

YES X NO _____

TELETYPE SERVICE:

YES _____ NO _____

ADDITIONAL INFORMATION:

ADD THE NEW ... SPE ...
THIS EXISTING ...



ACCOUNT SUPPLEMENT AND CHANGE

Date of Change: -24-72

Account Name: International Flower Exchange Int'l. Acct. 011

Billing Address Change:

Service Address Change:

<u>Phone No(s):</u>)	<u>301-1272</u>
)	_____
)	_____
)	_____
)	_____
)	_____
)	_____

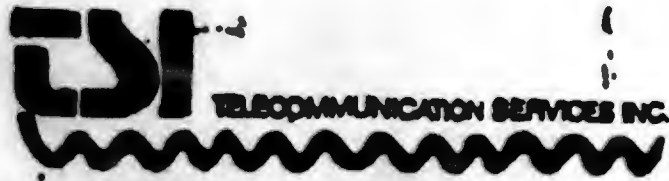
PAC'S
(Add) or (Delete)
Circle one of the
the above.

*1-24-72
PAC'S*

Contact Name: (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Comments: Please delete PAC's from this number
Tracks

Date:
1-24-72



Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

To: Betty D. Simon

FAX #: ()

From: Cynda

Number of pages to follow 2

Comments Please write ATC's from

this line which is a residence

ASAP

Thanks

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 1-24-73

Account Name: International Flower Exemption Acct. # 11

Billing Address Change: _____

Service Address Change: _____

Phone No(s):
 361-1272

PAC'S
(Add) or Delete
Circle one of the
the above.

(Handwritten signature/initials)

Contact Name: _____ (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Comments: Please delete PAC's from this number

_____ Trucks

Other Name: _____
Other Date: 1-24-73



Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

To: Betty D. Simone

FAX #: ()

From: Cyrai

Number of pages to follow 2

Comments Please delete ATC's from
this line which is a residence
ASAP

Thanks

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING ACCOUNT: 0/11

DATE OF ORDER: 8/6/90

COMPANY NAME: INTERNATIONAL FLOWERS EXCHANGE

ADDRESS: _____

CITY: _____ STATE _____ ZIP CODE: _____

CONTACT PERSON: _____ PHONE NO. () _____

SERVICE TYPE: _____

HOW MANY LINES: _____

LINES TO BE EQUAL ACCESS WITH TRS:

Area Code	Prefix	Line No.	Number	Area Code	Prefix	Line No.	Number
(30)	471	-	7900	(70)	471	-	7908
()	"	"	7901	()	"	"	7909
()	"	"	7902	()	"	"	7910
()	"	"	7903	()	"	"	7911
()	"	"	7904	()	"	"	7912
"	"	"	7905	"	"	"	7913
"	"	"	7906	"	"	"	7914
"	"	"	7907	"	"	"	7915
"	"	"	7908	"	"	"	7916
"	"	"	7909	"	"	"	7917
"	"	"	7910	"	"	"	7918
"	"	"	7911	"	"	"	7919
"	"	"	7912	"	"	"	7920
"	"	"	7913	"	"	"	7921
"	"	"	7914	"	"	"	7922
"	"	"	7915	"	"	"	7923
"	"	"	7916	"	"	"	7924
"	"	"	7917	"	"	"	7925
"	"	"	7918	"	"	"	7926
"	"	"	7919	"	"	"	7927

PAC CODES: 2 DIGITS 3 DIGITS 4 DIGITS

AUTHORIZATION CODE (S) YES _____ NO _____

SPECIAL INSTRUCTION (S):

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING: ACCOUNT: 0

DATE OF ORDER: 8/21/90

COMPANY NAME: International Flower Exchange Inc.

ADDRESS:

CITY: STATE ZIP CODE:

CONTACT PERSON: .. PHONE # ()

SERVICE TYPE:

HOW MANY LINES:

LINES TO BE EQUAL ACCESS WITH TOLL

()	_____	()	_____
()	_____	()	_____
()	_____	()	_____
()	_____	()	_____
()	_____	()	_____

PAC CODE: YES NO _____

2 DIGITS 3 DIGITS 4 DIGITS

AUTHORIZATION CODE (S) YES..... NO _____

SPECIAL INSTRUCTION (S):

* Please delete 2 digit page from
all existing Anis on this account. (111)
ASAP!

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING: ACCOUNT: 01

DATE OF ORDER: 8/6/90

COMPANY NAME:

INTERNATIONAL FLOWERS EXCHANGE

ADDRESS:

CITY:

STATE:

ZIP CODE:

CONTACT PERSON:

PHONE # ()

SERVICE TYPE:

HOW MANY LINES:

LINES TO BE EQUAL ACCESS WITH TOLL

(1529)

(30)	471-7900
()	7901
()	7902
()	7903
()	7904
..	7905
..	7906
..	7907

(70)	471-7908
()	7909
()	7910
()	7911
()	7912
..	7913
..	7914
..	7915
..	7916

471-7917
7918
7919
7920
7921
7922
7923
7924
7925
7926
7927

PAC CODES:

2 DIGITS

2 DIGITS

4 DIGITS

AUTHORIZATION CODE (S) YES _____ NO _____

SPECIAL INSTRUCTION (S):

8/8/90.

PLEASE DELETE PAC FROM ALL THE ABOVE
ANIS

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW EXISTING ACCOUNT: 0/1/1

DATE OF ORDER: 8/6/90

COMPANY NAME: INTERNATIONAL FLOWERS EXCHANGE

ADDRESS: _____

CITY: _____

STATE: _____

ZIP CODE: _____

CONTACT PERSON: _____

PHONE # () _____

SERVICE TYPE: _____

HOW MANY LINES: _____

LINES TO BE REMOVED ACCESS WITH TOLL

(30) 471-7900	1509
() 1 7901	
() 1 7902	
() 1 7903	
() 1 7904	
" 7905	
" 7906	
" 7907	

(20) 471-7908	
() 1 7909	
() 1 7910	
() 1 7911	
() 1 7912	
" 7913	
" 7914	
" 7915	
" 7916	

471-7917
7918
7919
7920
7921
7922
7923
7924
7925
7926
7927

PAC CODE: YES NO

2 DIGITS

3 DIGITS

4 DIGITS

AUTHORIZATION CODE (S) YES _____ NO _____

SPECIAL INSTRUCTION (S):

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING ACCOUNT: 0

DATE OF ORDER: 3/21/90

COMPANY NAME: International Flower Exchange Inc.

ADDRESS:

CITY: STATE ZIP CODE:

CONTACT PERSON: PHONE # ()

SERVICE TYPE:

HOW MANY LINES:

LINES TO BE EQUAL ACCESS WITH TOLL

()	()
()	()
()	()
()	()
()	()

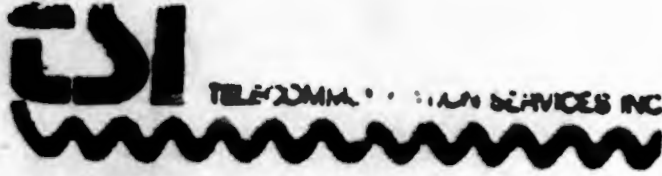
PAC SERVICE: NO

2 DIGITS 3 DIGITS 4 DIGITS

AUTHORIZATION CODE (S) YES..... NO.....

SPECIAL INSTRUCTION (S):

* Please delete 2 digit pac from
all existing Anis on this account. (-111)
ASAP!



Full Service Communications Company

12221 SW 129 Ct.
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: ATC

To: J. D. Garcia

FAX #: () _____

From: Myrtle

Number of pages to follow 3

Comments: see all the

and u.s.a.p.

MISS SR-60E
AIR MAIL - E1

Watts

The Postmaster agrees to pay the following amounts

Monthly Service Fee \$ 8
Drop Charges \$ 1

Street Address Y...
City ...
Main Telephone Number: 813-3473

Area Code	Telephone Number	Area Code	Telephone Number
813	681-3359		
813	681-3473		
813	681-4110		
	4-4564		

Yes No

Yes No

Choice: 1 _____
2 _____

Pureit
Watts

Authorized by Suey Brown
Title _____
Authorized Signature _____
Date _____

Account Number _____
100

[Large redacted area containing illegible text and markings]

Internal Use Only

Asst _____
 Sold by _____
 Installation Date _____
 COD _____
 Sales CR _____
 Meter Account Battery Account If No Acc. 0

ACCOUNT SUPPLEMENT AND CHANGES

Date of Change: 6-11-91

Account Name: Suzy Brewer & Assoc. Existing Acct. #

Billing Address Changes: N/A

Service Address Changes: N/A

Phone No. (A) 881-4370
6.12.91 (B) 681-3473
(C) 684-4564
() _____
() _____
() _____

(Add) or (Delete)
Circle one of the
the above.



(NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

add 3-digit DACS on all above

THANKS

Enter Date: 6-11-91

TSI

FAX COVER SHEET

**12221 SW 129TH CT.
SUITE 8200
MIAMI, FLORIDA 33186
(305) 251-2700**

TSI

TSI

PAGES INCLUDING COVER SHEET

2

COVER



simplex 3-digit pin
on acct. Susy Brewster
except (813) 30-4110

THANKS

1/16/45

1. Name of Contact

2. Address

3. Telephone Number

4. Business Title

5. Date of Last Contact

6. Remarks

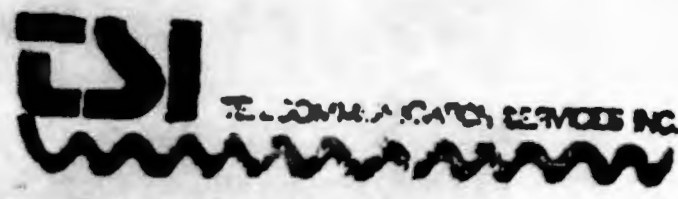
(Add) or (Delete)
Circle one of the above.

Contact Name _____ (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above

Contact: Please print 3-digit area code

Sales Rep: Mark

Index Date: 1-16-45



TELECOMMUNICATIONS SERVICES INC.

Full Service Communications Company

12221 SW 129 Ct
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: LT

To: [illegible]

FAX #. () [illegible]

From: [illegible]

Number of pages to follow 2

Comments: Please write FAX's

for this one - 121

Thanks.

23

T.S.I. SERVICES

BUSINESS / RESIDENTIAL

NEW ORDER / EXISTING

DATE OF ORDER: 11/4/89 ACCT NO. _____

COMPANY NAME: FRENCA EXPLOSION, INC.

ADDRESS: 571 NW 28 ST. CITY MIAMI, FL

ZIP CODE: 33127

CONTACT PERSON: RAM MENDEL

.....

SERVICE TYPE:

MAXIMUM SAVER	_____
ADVANTAGE SERVICE	<u>X</u>
CALL AMERICA SERVICE	_____
PREMIERE WATS	_____

INSTALLATION INFORMATION:

DIALER: YES _____ NO _____ HOW MANY LINES 2
**ATTACH DIALER INSTALL ORDER WITH THIS FORM

EQUAL ACCESS PRESUBSCRIPTION (ATTACH DESIGNATION CARD)

305-573-9064 _____

573-6392 _____

ADDITIONAL SERVICES: PAC CODES: YES X NO _____
2 X 3 _____ 4 _____

.....

TRAVEL SERVICE: YES _____ NO X

AUTH CODE INFORMATION: _____

COMMENTS:

Southern Bell Listing for this Account
is Miami Explosions Inc

cust #160



Hansy @SPM 3/5
act #160

French
Explosion

305-573-8238
2 Dug
y



SERVICE AGREEMENT

Service Type

Ser. #

3.0 00 9

CO

7210

Rec.

Model

Model

10

100 2000

100

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000

100 2000



100 2000 1542A
100 2000
100 2000
100 2000
100 2000

100 2000
100 2000
100 2000
100 2000
100 2000

RECEIVED

DATE

NAME

ADDRESS

PHONE

CITY

STATE

Circle one of the above

Tel. Sec. 416-71

Circle

334739-0VL
ACR 10/23
JMT

1956. 10. 21

John Doe
John Doe



Full Service ... Company

12th Ct
Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Pages to follow

Comments

Ed
9/25

ACCOUNT INFORMATION AND CHANGES

Date of Change: 1/25/11

Account Name: SPICIDS

Existing Acct. # 350

Billing Address Change: _____

Home Address Change: _____

Number of Units: 288 @ 516.5

(ADD) or (DEL) Circle one of the above.

68

Contact Name: 888-0363

NEW CONTACT OR 4-1-1 CONTACT Circle one of the above.

Comments: Party, please call this party in to this existing account.

Sales Rep: _____

System Date: 1/25/11

TELECOMMUNICATION SERVICES INC.

MONTHLY SERVICE AGREEMENT

BUSINESS/ RESIDENTIAL

NEW/ EXISTING/ ACCOUNT: 0

DATE OF ORDER: 7/2/80

COMPANY NAME: S. J. ...

ADDRESS: ...

CITY: ... STATE: ... ZIP CODE: ...

CONTACT PERSON: ... PHONE #: (1-5) 258-5252

SERVICE TYPE: ...

#350
910

HOW MANY LINES: ...

LINES TO BE EQUAL ACCESS WITH TOLL

(1-5) 258 - 5652 168	()
(1-5) 258 - 2139 ↓	()
()	()
()	()
()	()

PAC CODES: YES NO

2 DIGITS 3 DIGITS 4 DIGITS

AUTHORIZATION CODE (S) YES NO

SPECIAL INSTRUCTION (S):

Handwritten signature

ACCOUNT SUPPLEMENT AND CHANGE

Date of Change 11/11/91

Account Name ... **EXISTING ACCT. #** ...

Bill Line Address Change _____

Service Address Change _____

734600-915
382272-340

Phone Number(s) () _____ (Add) or (Delete)
() _____ Circle one of the
() _____ the above.
() _____
() _____
() _____

Contact Name _____ (NEW CONTACT) OR (SAME CONTACT)
Circle one of the above.

Comments *Please*
existing acct
...
...
...

Sales Rep ...
Today's Date 11/11/91

178

899

384V

RECORDS AND COMMUNICATIONS SECTION

SEARCHED INDEXED SERIALIZED FILED

[REDACTED]

[REDACTED]

Equal Access YES NO Don't Know

DATE OF LAST REVIEW

DATE OF NEXT REVIEW

DATE OF PREVIOUS REVIEW

15 9347

[REDACTED]

Yes

DATE OF LAST REVIEW

[REDACTED]

Yes

THE S+NON/HA20

550

386553-325

37296-680

943666-275

SEARCHED INDEXED SERIALIZED FILED

401544-415

Total
words

il

EXHIBIT _____
(MJD - 38)

11/29/89

TO: BETTY DESIMONE
FROM: JOEL ESQUENAZ (TSI)

TOTAL PAGES
17

DEAR BETTY;

PLEASE IMPLEMENT THE FOLLOWING NEW ORDER
AT YOUR EARLIEST CONVENIENCE.

TO REITERATE OUR PHONE CONVERSATION TODAY
CONCERNING PAC NOT WORKING.

MILWAUKEE AIR (PAC) 3 DIGIT.

MIAMI EXPLOSION 2 DIGIT - PAC

FRENCH EXPLOSION 2 DIGIT - PAC

EL DORADO - LOCATION # 1 2 DIGIT - PAC.

EXHIBIT

5121144
TSI 38 MG

PLEASE ALSO CONFIRM THAT THE FOLLOWING ACCOUNTS
LISTED BELOW ARE CURRENTLY UNDER MY COMPANY
IN MY BILLING SYSTEM. THEY HAVE GOTTEN A BILL
FROM TEL-US.

EL DORADO - LOCATION # 4; PLEASE REVIEW THE COPY
OF THE TEL-US BILL I PICKED UP FROM THEM
TODAY. I ALSO CALL THE 1-700 # TO CONFIRM THAT
THEY ARE CURRENTLY WITH TEL-US AND I GOT A
RECORDING FROM ATE, IN WHICH THE ANSWER IS ALL ONE, BUT
I WAS NOT AWARE OF NUMBER OF NUMBER WAS ALREADY
COMPLETED.

1) MIAMI EXPLOSION - MAIN PHONE # 576-0230; CUSTOMER CALL
ME AND TOLD ME HE HAD RECEIVED A BILL FROM TEL-US.

2) FRENCH EXPLOSION - MAIN PHONE # 573-9041; SAME OWNER

PLEASE REVIEW THOSE SITUATION AND
ASSIST ME IN COLLECTING THEM.

THANKING YOU IN ADVANCE.

Regards
Jare.

EXHIBIT _____
(MJD - 39)

EXHIBIT

8/24/94
TSI #39 MB

FAX COVER SHEET

TSI
14069 S.W. 104th St.
Suite No. 1400
Miami, Florida 33196

To: Berry G. Simone

Company: _____

Fax No.: (____) _____

Number of Pages Including Cover Sheet 3

From: Joel Esquivari

Date: 6/25/90.

Comments: Dear Berry. please implement
TRAP.

Thank you.
Joel

1/27,

I hope you're doing fine AFTER A
NICE RAINY WEEK END.

Anyways PLEASE cancel and DISCONNECT
ASAP ACCOUNT # 230. They're MEDICAL
SERVICES OF Dade County.

ALSO PLEASE CHECK ACCOUNT # 102

NOVIX SECURITY, ACCOUNT # 231 TROPICAL-
TILES, ACCOUNT # 213 CBR Inc, ACCOUNT
242. EVERGLADES STEEL.

All of these accounts that I mentioned
in the above PARAGRAPH ARE BEEN BILLED
by ATC AND TSI. The TSI REVENUE
PORTION IS ABOUT 15% ONLY. PLEASE CHECK ALL
OF THEIR ANIS AND DELETE THEM FROM
THE ATC SCREEN AND CANCEL THEIR ACCO-
UNT # FROM THE ATC SCREEN SO THEY
WON'T GET BILLED BY ATC ANYMORE AND I
CAN GET MY REVENUE.

Thanking you in ADVANCE.

Jeff.

EXHIBIT _____
(MJD - 40)

EXHIBIT

8/24/90
TSI 144C MG

TO: Mary Jo Daurio
FROM: Joel Esquenazi
DATE: September 26, 1990

Dear Mary Jo:

We have discussed numerous times the problem with my accounts been billed by ATC erroneously.

This problem is derived when I switch the customer to PIC 031 and Southern Bell submits a mag tape to ATC as an allocated account, this account is then taken out of my base and billed by ATC, and it also affects any feature such as PACS.

When a customer is billed by ATC this not only confuses my customers but in many cases I have lost customers due to the confusion, and it also takes valuable time from me.

Please assist me in correcting this problem by implementing something that will not allow the ans to be duplicated or that my base data has preference over the new information being entered.

On this payment I have also deducted credits due me for accounts billed by ATC.

Please note that I am deducting the total usage for International Monetary for April 1990. Attached please find a request to disconnect all ans from this account and it was not done until the middle of May, this company is now out of business.

Starting on the payment of 7/90 I will be deducting 25% off of domestic usage. The reason behind it, is because 90% of my customer base is with a service that bills at one minute increment. If I was billed at 6 second for all calls made by customers base I would make an additional 40% profit due to the 30 seconds minimum and 1 minute billing.

Should you have any questions, please call me.

Thank you.

DEDUCTIONS

TSI

<u>ACCT. NAME</u>	<u>DEDUCTIONS</u>
Forms, Etc	\$ 38.06
Amalgama Trading	\$ 93.88
Bridgette Lobban	\$ 92.19
Pilar Tours	\$ 49.58
El Dorado Furniture	\$ 52.88
Elite Sales, Inc.	\$ 19.55
Internt'l Monitary Corp	\$ 5,430.22

ATC ACCOUNTS BILLS INCORRECT

<u>ACCT. NAME</u>	<u>ACCT. #</u>	<u>DEDUCTION</u>
Internt'l Flower Exchange	161103	\$ 1,144.90
Internt'l Flower Exchange	161103	\$ 2,911.05
D. R. Export	354237	\$ 94.21
Gourmet Bouque	009949	\$ 176.93
Orgin Technologies	343215	\$ 20.95
Advance Marine	205579	\$ 118.20
	352850	\$ 1,060.85
First Paragon	210181	\$ 239.75
Jose Alfaro	01-101-159270	\$ 24.62
	347228	\$ 24.83
	354073	\$ 58.45
	01-101-113194	\$ 462.31
Network Security	01-101-113194	\$ 1,574.39

<u>ACCT. NAME</u>	<u>ACCT. #</u>	<u>DEDUCTION</u>
First Equity Corp	345285	\$ 258.65
First Equity Corp	345285	\$ 8.59
InLatin Produce, Inc.	352850	\$ 774.03
Advance Marine	205578	\$ 23.24
Fundamental Management	108212	\$ 81.64
Orgin Technologies	343215	\$ 1.56
	335158	\$ 95.24
	335150	\$ 184.24
TOTAL DEDUCTIONS		\$15,114.99

TOTAL DUE 35,878.
 2,110

 \$ 37,988 TOTAL DUE
 - 15,114 DEDUCTIONS

 DEDUCTIONS
 TOTAL DUE AFTER $\$ 22,764$

EXHIBIT _____
(MJD - 41)

EXHIBIT _____
(MJD - 42)

July 19, 1991

EXHIBIT

5/24/94
TSJ #42 Mo

Ms. Mary Jo Daurio
ATC
1515 S. Federal Hwy.
4th Floor
Boca Raton, FL 33432

Dear Ms. Daurio:

Thank you for your continued support and assistance to our company. We wish to advise you of several items that are of the utmost importance to us.

The first item is one that we have discussed on prior occasions but continues to occur. This regards TSI customers continuing to receive bills, calling cards, advertising and other correspondence from ATC.

This problem obviously has grave implications, along with the fact that it confuses the customer it takes away from our revenue.

The second item regards the transferring of ani's of newly acquired TSI customer via magnetic tape. As I mentioned to you on our phone conversation the two attempts that were made by yourself to transfer approximately forty accounts was not successful. We would appreciate anything you could do to make that something we can use and rely on.

Again with our increase in sales and the new policy put in place by Southern Bell has become quite difficult for us to transfer new customers to our PIC. Again this has several negative implications to our doing business successfully.

Thank you once again in advance for your cooperation and consideration of this matter.

Sincerely,

Joel Esquenazi
President

EXHIBIT _____
(MJD - 43)

MESSAGE CONFIRMATION

AUG-22-93 751 15:12

TERM ID: 751 LONG DISTANCE CO F-0222
TEL NO: 305-251-2965
ID DEPT CODE 02 30

NO. DATE ST. TIME TOTAL TIME
209 08-22 15:12 00:01:12

EXHIBIT

8/24/94
751#43 MG

Suite # 200
Miami, FL 33186
(305) 251-2700
FAX (305) 251-3565

FAX COVER SHEET

Company: AK

To: Betty De Simone

FAX #: () _____

From: Cyndi

Number of pages to follow 2

Comments Betty, I know I've told you
about that account before, but
I also want it in writing.

Thanks.

8-23-21

Betty:

All of these accounts are getting billed by ATC,
please check this as soon as you can and
take them out of the billing. This is happening
too often. I am sending it to you in writing
in order to have records for myself.

Thank you.

Cyndi

- Pan American Hospital (#663)
- Universal Athletics #557
- Aqualine # 748
- Continental Services #526 (even being called by collection)
- The Lead Source #537 (also being harassed by ATC)
- Caritas Lindas #623