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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

020260-TL

DOCKET NO. 910163-TL

FILED: June 11, 1993

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

**CERTIFIED COPY**  
*Williams & Hahn*

Pompano Beach, Florida  
June 22, 1993  
2:45 o'clock p.m.

\* \* \*

DEPOSITION  
OF  
LINDA HENRY

\* \* \*

DOCUMENT NUMBER-DATE  
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LAWYER'S NOTES

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I N D E X

WITNESS  
LINDA HENRY

DIRECT  
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1                   Deposition of LINDA HENRY, a witness of  
2 lawful age, taken by the OFFICE OF THE PUBLIC COUNSEL, for  
3 the purpose of discovery and for use as evidence in the  
4 above-entitled matter, In re: Petition on behalf of  
5 CITIZENS OF THE STATE OF FLORIDA to initiate investigation  
6 into integrity of SOUTHERN BELL TELEPHONE & TELEGRAPH  
7 COMPANY'S repair service activities and reports, pending  
8 before the FLORIDA PUBLIC SERVICE COMMISSION in and for  
9 the State of Florida, pursuant to notice heretofore filed,  
10 before CHRISTINE A. AMAN CANNON, a Notary Public in and  
11 for the State of Florida at Large, Southern Bell Telephone  
12 & Telegraph Company, 1230 North Federal Highway, in the  
13 City of Pompano Beach, County of Broward, State of  
14 Florida, on the 22nd day of June, 1993, commencing at 2:45  
15 o'clock p.m.

16   \* \* \*

17 Thereupon:

18   LINDA HENRY

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

22   DIRECT EXAMINATION

23 BY MS. RICHARDSON:

24           Q.    Ms. Henry, will you please state your name and  
25 spell it for the court reporter.

1           A.    I'm Linda Darnell Henry, L-I-N-D-A   D-A-R-N-E-L-L  
2 H-E-N-R-Y.

3           Q.    Your address please.

4           A.    I'm here at 1230 North Federal Highway.

5           Q.    Pompano, Florida?

6           A.    Pompano.

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

8           A.    I don't know what it is.

9           Q.    That's a business address, right?

10          A.    Uh-huh.

11          Q.    Do you have a phone number?

12          A.    305-784-2175.

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

14          A.    Yes.

15          Q.    And I'll ask him to put his appearance on the  
16 record.

17                MR. CUNNINGHAM:  For the record it's Gerald  
18 Cunningham with Hitchcock and Cunningham.  I'm here  
19 for Ms. Henry.

20          Q.    Ms. Henry, have you discussed this deposition  
21 here today with anyone other than your attorney or the  
22 attorney for Southern Bell?

23          A.    I've talked to other people in the office and  
24 stuff that I was going to make one and with my family.

25          Q.    Did you talk about any possible questions or

1 answers?

2 A. We didn't go into details.

3 Q. Has anyone given you any assurances that you  
4 would not be disciplined based upon what you told us here  
5 today?

6 A. I was told to tell the truth.

7 Q. Did anyone talk to you about the possible  
8 criminal penalties for perjury if you perjured your  
9 testimony?

10 A. I know for perjury you could end up in jail.

11 Q. Did you ever give a statement to the company in  
12 the past?

13 A. About a year -- Yeah, I did.

14 Q. Just about one year ago?

15 A. Maybe give or take.

16 Q. '91, '92 somewhere.

17 A. Somewhere around that time.

18 Q. Do you know where you gave it?

19 A. I was down at the Southern Bell building down the  
20 street here.

21 Q. In Lauderdale?

22 A. Uh-huh.

23 Q. Do you know who was in the room with you when you  
24 gave that statement?

25 A. I think -- I'm not sure who the guys were now.

1 It's been a while ago.

2 Q. Was there an attorney there?

3 A. I think one of them was an attorney.

4 Q. Was there someone from the union there?

5 A. I'm not real sure at this time. I don't really  
6 remember who it was and what their positions were now.

7 Q. Do you know if they were with the company?

8 A. I guess. I'm not -- Like I said, I'm not really  
9 one hundred percent sure because I was nervous that day  
10 and I don't remember.

11 Q. Was your supervisor there?

12 A. No.

13 Q. Did you talk to anybody about that statement?

14 A. Not in detail. We just basically talked about,  
15 you know, we had told them --

16 MR. BEATTY: Just a minute. I'm sorry. As long  
17 as your comments are going to refer to matters other  
18 than what you actually talked about in the statement,  
19 please continue.

20 A. No.

21 Q. So all you talked about was that you did give a  
22 statement; is that what you are saying?

23 A. Uh-huh.

24 Q. What's your present position?

25 A. I'm a maintenance administrator.

1 Q. How long have you held that position?

2 A. Since the time they upgraded us from a dispatch  
3 clerk to an MA. I don't remember what year that was.

4 Q. Do you know about how many years that's been?

5 A. It's been a while. Somewhere in the 80s.

6 Q. Has all of that time been here in Pompano?

7 A. No.

8 Q. Where else have you been?

9 A. In Boca.

10 Q. Have you been an MA anywhere else between Pompano  
11 and Boca?

12 A. No.

13 Q. Can you tell me approximately when you were an MA  
14 in Boca?

15 A. Somewhere I guess early 80s.

16 Q. Who is your first level supervisor?

17 A. Dennis Marshall.

18 Q. How long has Mr. Marshall been your supervisor?

19 A. It's been a while. We get moved around from time  
20 to time. So I don't keep track.

21 Q. Has it been a year?

22 A. May have been.

23 Q. Can you recall any other first level supervisors  
24 you've had here in Pompano?

25 A. Jim Thomas, I think he was a first level. Sally

1 Blake. I can't -- I can't really remember all of them.

2 Lynn Newmaster.

3 Q. Do you remember any first levels in Boca?

4 A. Daryl Evenson.

5 Q. Can you spell his last name.

6 A. E-V-E-N-S-O-N.

7 Q. Okay.

8 A. Boca is a long ways. I don't remember who all  
9 was there now, you know. I don't remember all of them.  
10 He was my first one. That's why he stands out in my mind.

11 Q. Who's your present second level manager?

12 A. Dennis Slattery.

13 Q. Did you have another second level besides Mr.  
14 Slattery here in Pompano?

15 A. Jim, I think, is a second level too.

16 Q. Jim?

17 A. Thomas, I think.

18 Q. Do you remember any second levels from Boca?

19 A. Not at the moment. The names escape me right  
20 now.

21 Q. Do you know who your operations manager is right  
22 now?

23 A. Not sure, no.

24 Q. Are you a member of the union?

25 A. No.

1 Q. What do you do as a maintenance administrator?

2 A. Right now I screen troubles and I just -- every  
3 once in a while dispatch a guy on a trouble, and I assist  
4 the guy in whatever I can.

5 Q. Do you close out reports?

6 A. Some, not a whole lot.

7 Q. Do the STs close out their own reports now?

8 A. Most of them. They have BRICKS or CATS.

9 Q. How long have they been able to close out their  
10 own reports?

11 A. It's been a long time now some of them have been  
12 able to do it. I don't know exactly what year.

13 Q. Before they got the BRICKS or the CATS, were you  
14 closing out reports for outside repairmen?

15 A. For a short time.

16 Q. The kind of reports that you dealt with, were  
17 these customer trouble reports?

18 A. Uh-huh.

19 Q. Did you say you tested reports, screened reports?

20 A. Uh-huh.

21 Q. Was part of your testing and screening function  
22 to decide if a trouble was out-of-service or not  
23 out-of-service?

24 A. Yes.

25 Q. How did you make that distinction; how did you

1 tell?

2 A. Based on the tests and I would try to contact the  
3 customer.

4 Q. And this test, was it an automatic computer test?

5 A. Computer MLT, yes.

6 Q. Were there certain MLT tests that were suppose to  
7 automatically out-of-service?

8 A. I believe so some were, indicated harder  
9 troubles.

10 Q. Were there any instructions about if the customer  
11 decided he was out-of-service but the test didn't show it,  
12 how were you suppose to status those?

13 A. Based on what -- if I could reach the customer  
14 myself is what decided if it was out-of-service.

15 Q. What if the test showed it wasn't out-of-service  
16 but the customer said he was; how would you make that  
17 decision?

18 A. If I called the customer and they said they were  
19 out-of-service. And he said no, I don't have dial tone.  
20 Then I took their word.

21 Q. On statusing before the men got the CAT terminals  
22 if you can think back that far -- You said it was quite a  
23 while ago -- Were those decisions about statusing  
24 out-of-service or not out-of-service, were those made up  
25 front or at close out or at some other point in the

1 process?

2 A. It changed sometimes. Like I said, most times it  
3 was based on what I found in talking and testing.

4 Q. When might a decision have been made on close out  
5 whether or not to status an out-of-service?

6 A. Depending on -- I think there was a short while  
7 where you asked the guy at the close out, was it  
8 out-of-service but most of those were already statused  
9 out-of-service, I believe.

10 Q. Was this in Boca or Pompano?

11 A. I think Boca.

12 Q. In Boca Raton?

13 A. Yeah. And may have been the first part of here.  
14 I can't think -- remember clearly back that far.

15 Q. Do you know if any of those reports would have  
16 been statused out-of-service if they were cleared under  
17 twenty-four hours but not statused out-of-service if they  
18 would have gone over twenty-four hours?

19 A. I can't say. I don't know.

20 Q. Do you know if the company requires  
21 out-of-service reports to be repaired within twenty-four  
22 hours?

23 A. Well, I was always told to try to make the  
24 twenty-four hours, you know, try to get customers -- We  
25 didn't want them to be out-of-service over twenty-four

1 hours.

2 Q. Do you know if the Public Service Commission  
3 requires the company to complete repairs within  
4 twenty-four hours at least ninety-five percent of the  
5 time?

6 A. I know they had something to do with it but I'm  
7 not sure what exactly the PSC -- To me the PSC is like to  
8 make sure you're treating the customer properly. 3

9 Q. On this instance that you've referred to about  
10 waiting until close out to status out-of-service, do you  
11 know if that was ever done in order to help meet that PSC  
12 requirement to clear the out-of-services over twenty-four  
13 hours?

14 A. I don't know what the reason was.

15 Q. Do you know if a customer is due a rebate if  
16 they're out-of-service more than twenty-four hours?

17 A. Now I do.

18 Q. Now you do. When did you find that out?

19 A. Somewhere in the course of time. I don't know  
20 exactly the moment.

21 Q. Has it been several years?

22 A. May or may not. I honestly don't know.

23 Q. Can you recall any occasions when trouble reports  
24 may have been mishandled and the customers were denied the  
25 rebates because the reports had been mishandled?

1 A. No.

2 Q. Have you ever heard of the phrase "backing up the  
3 time"?

4 A. Yes, I have heard of it.

5 Q. What does that mean to you?

6 A. You ask the guy when did he restore service, and  
7 you close your report based on that.

8 Q. At the point the customer was given dial tone?

9 A. Uh-huh. Yes.

10 Q. Have you ever heard it used in any other way?

11 A. None that I can think of.

12 Q. Ms. Henry, I'm going to show you a document and  
13 it's entitled Citizens Third Set of Interrogatories. An  
14 interrogatory is a question that I've put down in writing  
15 and mailed to the company, and the company has mailed me  
16 an answer back. This is dated June 6, 1991.

17 And we asked the company to give us the names of  
18 the employees who knew about falsifying completion times  
19 on repair reports. And the company responded with the  
20 names of employees that might have some information about  
21 that.

22 What I'm going to do is let you take a look at  
23 this. And we'll go off the report, and you can talk to  
24 your attorney about it. And then when you're comfortable,  
25 we'll go back on the record.

1 A. Okay.

2 Q.

3 A. Yes.

4 Q. Other than what you've told me about the times  
5 being backed up to the time service was restored, is there  
6 any other information that you have about backing up  
7 clearing times?

8 A. No. Other than I have closed reports that were  
9 given to me. That's it. And I have no reason to state at  
10 this time that I doubted what was on the reports.

11 Q. Can you explain further about closing these  
12 reports that were given to you.

13 A. I worked in where say a manager or a person, an  
14 MA took calls a cable close out. And they were given  
15 information, when I was first learning cable, and they  
16 would give it to me to close it. And I would close it to  
17 whatever time was on the report.

18 Q. Did they give you a specific clearing time to  
19 impute on these reports?

20 A. Uh-huh because they asked the cable guy at what  
21 time did you restore service.

22 Q. Did you ever call a customer back; were you asked  
23 to call the customers?

24 A. Uh-huh. There were instances where I would call  
25 the customer.

1 Q. Do you know if the times that you were given for  
2 the clearing time on these reports were accurate?

3 A. I trusted them whoever gave me the report.

4 Q. Which managers followed this procedure with you?

5 A. Whoever was in the control pot, that's the way  
6 they did it.

7 Q. Are you familiar with a process where bulk  
8 closing cable reports?

9 A. Yeah.

10 Q. Can you briefly explain that process to me.

11 A. If there was a cable failure, troubles were all  
12 attached to that failure. And you would test the failure  
13 and try to contact most of the customers and close it to  
14 whatever time the guy gave you.

15 And if you found something wasn't cleared and  
16 you're calling the customer, you would pull it out of the  
17 failure and dispatch on it again if necessary.

18 Q. Were these reports that you had been given in  
19 this group with one set of closing time or clearing time,  
20 were they part of the cable failure built in and attached  
21 to the report?

22 MR. BEATTY: Objection to the form of the  
23 question. Counsel is testifying.

24 A. Uh-huh.

25 Q. Was that a yes or no ma'am? She can't take a

1 uh-huh.

2 A. Wait a minute. Ask the question again.

3 MR. CUNNINGHAM: Can you ask the question again  
4 please.

5 Q. Yes. We'll try to work this around. You said  
6 earlier, I think, that someone would give you a cable  
7 report and that you would put on -- They would give you  
8 the clearing time that you would load all the clearing  
9 times on. Is that what you were saying?

10 MR. BEATTY: I object to the form of the  
11 question. This testimony has already been gone  
12 through. There's no basis for counsel to restate  
13 what the testimony is. The record speaks for itself.

14 Q. On the reports that you were handed to post  
15 clearing times, why weren't these just bulk closed?

16 A. They would be. You type one line of status  
17 after -- Well, you would try to contact the customer  
18 first, and after you found -- If you found anything that  
19 wasn't closed, you pulled it out of that. And you closed  
20 them with one close out.

21 Q. The reports that you were handed to do  
22 individually, why were they pulled out instead of bulk  
23 closed?

24 A. There were -- Maybe something was still wrong  
25 with it or there was still trouble on the line. Maybe

1 after calling the customer, you realized it wasn't cleared  
2 or the customer said something else was wrong.

3 Q. Were you ever called upon to restatus any of  
4 these reports as out-of-service before you closed them?

5 A. I don't think so.

6 Q. Do you know if the reports that you were given to  
7 do a bunch of close outs on, were they out-of-service  
8 reports?

9 A. Some were, some weren't.

10 Q. Do you know of any ST who reported a service  
11 restoral time that was not correct?

12 A. No because I never challenged the guy. I  
13 accepted what he told me.

14 Q. Did you ever receive instructions to place a  
15 clearing time on a record that you personally know was not  
16 correct?

17 A. No because like I said, I didn't challenge what I  
18 was given.

19 Q. When you close out reports before the men had the  
20 CAT terminals -- I'm still working on that period of  
21 time -- were you called upon to impute disposition and  
22 cause codes?

23 A. I closed it to what the guy gave me.

24 Q. Can you briefly define for me what a disposition  
25 and cause code are.

1           A.    They're -- Basically, it tells you what he  
2 repaired the trouble to.

3           Q.    What's the difference between a disposition and  
4 cause code?

5           A.    The cause code basically tells you what caused  
6 it.

7           Q.    Can you give me an example.

8           A.    Three twenty stands out in my mind because that's  
9 a defective code.

10          Q.    Multiple cable failure?

11          A.    No.  That's just -- It could be equipment or a  
12 plant defective.  Six hundred, unknown.

13          Q.    Are there codes for weather?

14          A.    Yes.  I believe there was.

15          Q.    Do you know if any of these particular codes  
16 would take an out-of-service report that had gone over  
17 twenty-four hours and keep it from counting as a miss in  
18 the company; it wasn't the company's fault it went over  
19 twenty-four hours because it was caused by rain?

20          A.    May or may not have.  I'm not sure.

21          Q.    Do you know of any disposition codes that might  
22 keep a report from being counted as a miss if the company  
23 didn't get it cleared up within twenty-four hours?

24          A.    I don't think so.

25          Q.    Is there a disposition code for inside wire?

1           A.    I believe there is.

2           Q.    If the problem was found inside the house and the  
3 customer didn't want the company to fix it but it went out  
4 over twenty-four hours, do you know if that still counted  
5 against the company as an out-of-service over twenty-four?

6           A.    I'm not sure. I'll just leave it at that. I'm  
7 not sure.

8           Q.    Do you know what excluding a report is?

9           A.    Uh-huh.

10          Q.    When do you exclude reports?

11          A.    If it's referred to an outside carrier, long  
12 distance carrier or information only, most times I exclude  
13 it.

14          Q.    Is it proper to exclude an out-of-service report?

15          A.    If it's out-of-service, I would imagine there's  
16 trouble on the line. So why would you exclude it?

17          Q.    Have you ever heard of someone excluding  
18 out-of-service reports?

19          A.    Not that I'm aware of. I didn't. I'll put it  
20 that way.

21          Q.    Do you know of anybody who has used somebody  
22 else's employee code?

23          A.    I felt there were times a few things were closed  
24 that I didn't closed to because I know how I worded  
25 things. And I wasn't maybe there that day or something.

1 Q. Was your employee code on those reports?

2 A. Yes.

3 Q. Was this in Pompano or Boca?

4 A. I think it was happening both places but those  
5 times have been not that often.

6 Q. Do you know if there was anything wrong with the  
7 reports where your number was used?

8 A. At the time, no. It was just a case of may have  
9 seen it as a repeat or something. And I looked at it and  
10 I said it didn't look like something I closed. But I  
11 don't remember if it stands out as being something  
12 terribly wrong.

13 Q. Did a manager or anybody ever question you about  
14 why your number was on this report?

15 A. No. I questioned them.

16 Q. Oh, did you? What did they tell you?

17 A. Well, our numbers are close. Maybe somebody  
18 accidentally typed the wrong number.

19 Q. Did anybody go any further and do any  
20 investigation about your number being used by someone  
21 else?

22 MR. BEATTY: If you know.

23 A. I don't know.

24 Q. Do you know of anyone else beside yourself whose  
25 number was used?

1 A. I don't -- I can't say that.

2 Q. Do you know what a no access code is?

3 A. Yes.

4 Q. Basically, what's a no access?

5 A. Where the repairman goes out and the customer  
6 isn't home so he no accesses the trouble.

7 Q. Do you know of anyone who's no accessed a report  
8 before it was dispatched?

9 A. Not that I'm aware of.

10 Q. Do you know if that no access would stop a  
11 twenty-four hour clock on an out-of-service report?

12 A. I was told it would.

13 Q. Do you know of anyone who no accessed records in  
14 order to stop that twenty-four hour clock?

15 A. No. I always no accessed it if the guy told me  
16 it was no access.

17 Q. Do you know of any outside repairmen who reported  
18 a no access when the customer was actually home?

19 A. No.

20 Q. Do you know what the carried over no or the CON  
21 code is?

22 A. Vaguely. I think the CON code was if it was  
23 future due dated. I think that's what that was about.

24 Q. Do you know if the CON code stopped that  
25 twenty-four hour clock?

1           A.    I don't know if it stopped the clock or not but  
2 it was used on troubles that -- When I CON'd something, it  
3 was on troubles that weren't out-of-service because I was  
4 told if it was out-of-service, you should put it out for  
5 dispatch.

6           Q.    Do you know of anyone who did CON out-of-service  
7 reports?

8           A.    No.

9           Q.    Is a CON code still used?

10          A.    I'm not sure at this moment if we're using it or  
11 not.

12          Q.    Do you know of any other codes that would stop  
13 that twenty-four hour clock?

14          A.    No.  If I do, I can't think of any right now.

15          Q.    Have you ever heard the phrase "building the  
16 base" of out-of-service?

17          A.    I've heard rumors of it but I've never done it.

18          Q.    What rumors have you heard?

19          A.    Just in teasing people have said, you know, that  
20 but I haven't never known anyone to do it.

21          Q.    Have you ever heard of anyone creating fictitious  
22 out-of-service reports?

23          A.    No.

24          Q.    Do you know of anyone who has taken a group of  
25 effecting service reports and restated them as

1 out-of-service?

2 A. No. Not intentionally, no.

3 Q. What's a test okay report?

4 A. You test the line and you didn't find any  
5 trouble. And there's no one at home.

6 Q. Based on your training and experience from  
7 working as an MA, would you close out a test okay as  
8 out-of-service?

9 A. If it was testing okay and I couldn't reach the  
10 customer, I think we were told not to close it. I think.

11 Q. Would it go to a pack file?

12 A. Usually we held it and tried to reach the  
13 customer up until close to I think two or three hours  
14 before the committed time. I think that's the way it  
15 went.

16 Q. The committed time, is that the twenty-four hour  
17 time or --

18 A. The time on the commitment or on the report.

19 Q. The time the customer has been told that it would  
20 be repaired by?

21 A. Uh-huh.

22 Q. Do you know of anyone who has taken a group of  
23 test okays that were being held and closed all of them out  
24 as being out-of-service?

25 A. No.

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

2 A. No.

3 Q. Have you ever had a manager tell you not to close  
4 an out-of-service report that's about to go out over  
5 twenty-four hours without getting his permission?

6 A. No.

7 Q. Have you ever had a manager tell you, don't  
8 status any out-of-services today?

9 A. There were a few occasions where I was told they  
10 would close it out of status at their close out point.

11 Q. Do you know if they actually did close out  
12 out-of-service at close out?

13 A. I don't know because I was just screening  
14 troubles. I wasn't on the close out part of it.

15 Q. Do you know if the STs with their CATS can status  
16 a report as out-of-service?

17 A. They may have the ability. I haven't really seen  
18 what all the CATS and BRICKS can do.

19 Q. Have you had an ST call you since they've had the  
20 CATS to restatus a report as out-of-service?

21 A. They never call us about restating a trouble at  
22 least not me.

23 Q. Have you ever heard of a manager or excuse me --  
24 Let me rephrase. Do you know of any managers who have  
25 statused and coded trouble reports themselves personally?

1 A. If they did, I don't know of it.

2 Q. Have you ever heard of a grievance being filed by  
3 MAs because managers were statusing and coding trouble  
4 reports?

5 A. People file grievances on different bases. It  
6 may have happened. It may not have. I never filed one.

7 Q. That was my next question. You're doing good.  
8 You're anticipating me. Have you ever received an  
9 informal discipline?

10 A. No.

11 Q. Have you ever received a B-form or written  
12 discipline?

13 A. No.

14 Q. Do you know of anyone who has been disciplined  
15 for improper processing of trouble reports?

16 A. No.

17 Q. Do you know what an employee originated report  
18 is?

19 A. EO report?

20 Q. Yes. What is that or briefly describe it for me.

21 A. Maybe I'm doing -- Well, if a repairman called in  
22 and he noticed a problem on a customer's line, he would  
23 ask us to test it and then make an EO report. That's what  
24 we used to do.

25 Q. What do you do now?

1           A.    If he observes trouble on the line, he's suppose  
2 to get his foreman to call us.  And only certain people  
3 can make a -- Well EO reports, anybody can make one but  
4 anyway I think the foreman is suppose to give an okay on  
5 it.

6           Q.    Do you know why that change was made?

7           A.    I guess to insure that there was problems on the  
8 line.

9           Q.    If a customer were to ask an employee who's  
10 outside working to phone in a report for the customer --

11          A.    Customer direct.

12          Q.    -- That's a customer direct report.  Do you know  
13 of any instances where those type of customer direct  
14 reports relaid through an employee were really imputed as  
15 employee reports?

16          A.    No because the guy would just tell us the  
17 customer asked us to make a report on this, and it went  
18 down as a CD, customer direct.

19          Q.    Do you know of any instances where customers were  
20 given the IMC number to call on repeat reports and when  
21 the customer called the IMC instead of the CRASB, an  
22 employee report was opened instead of a customer direct?

23          A.    We were told any time the customer initiated it,  
24 it was a customer direct.

25          Q.    Other than what you were told, do you know of any

1 instances that those type of CD reports were opened as EO  
2 reports?

3 A. No, that was the rule.

4 Q. Do you know of anyone who closed an  
5 out-of-service report that's about to go out over  
6 twenty-four hours, a CD report and then reopened it as an  
7 EO report to actually finish the work?

8 A. I don't think so.

9 Q. Do you know of any occasions where false  
10 information has been put on customer records?

11 A. I can only answer for myself. I closed it to  
12 what the repairman gave me.

13 Q. Can you recall any occasion or any instances,  
14 excuse me, of improper processing of trouble reports?

15 A. No.

16 Q. Have you ever been asked to help sell services or  
17 products for the company?

18 A. There was a time in our office when they were  
19 encouraging us to sell to the customer.

20 Q. Did you participate?

21 A. There were one or two times when -- I never  
22 offered -- told the customer what we had. If in talking  
23 to the customer, they said -- I noticed they didn't have  
24 touch tone on the line and I would say -- ask them if  
25 they wanted it. Say they couldn't break the dial tone on

1 their phone. And I would say well, do you have a touch  
2 tone phone. We do offer touch tone and if you want it, I  
3 can connect you with the business office.

4           There were a few times, I think once or twice I  
5 may have sold something but most of the time I would refer  
6 them to the business office because I didn't like selling.

7           Q. Did you ever win any prizes or awards for your  
8 sales effort?

9           A. No. I didn't sell that much.

10          Q. At the time when you were asked to help sell did  
11 anybody give you any special sales training?

12          A. No.

13          Q. When you had been asked to help sale, did anybody  
14 ever ask you to keep track of the amount of time you spent  
15 doing sales verses the amount of time you spent helping  
16 the customer with the report?

17          A. I can't remember. Like I said, I didn't get into  
18 the selling that much.

19          Q. Have you ever heard of any customers who had  
20 services put on their line that they didn't order?

21          A. There were occasions when I would talk to  
22 customers. They would report a trouble and I would find  
23 out it was call waiting or some feature. And sometimes  
24 they would say well, I didn't ask for that. And so I  
25 would connect them to the business office to get it

1 removed.

2 Q. Do you know if it was removed?

3 A. I'm assuming the rep did because I would back off  
4 of the line once I, you know, connected them and told them  
5 the reason.

6 Q. So you're not aware of whatever happened with the  
7 business office or the follow-up?

8 A. No.

9 Q. Okay Ms. Henry, I think I'm finished with my  
10 questions. I want to thank you for being here. There may  
11 be one or two before you go from the other people.

12 MR. GREER: I've got a couple. I believe you  
13 said that you close out cable troubles; is that  
14 correct?

15 THE WITNESS: Uh-huh.

16 MR. GREER: I think you also said that there were  
17 instances where you would call the customer to check  
18 to see if their line was repaired or not.

19 THE WITNESS: Uh-huh.

20 MR. GREER: Were there instances where you didn't  
21 call the customer?

22 THE WITNESS: Where I didn't?

23 MR. GREER: Didn't or did not attempt to call the  
24 customer?

25 THE WITNESS: Say for instance, if there was a

1 major failure, we were told to call like maybe every  
2 third or fourth customer sometimes or if we looked at  
3 the overall test result and we saw there were hard  
4 troubles or something on there, we would try to  
5 contact those ones.

6 MR. GREER: That's all I have.

7 MR. BEATTY: That's it.

8 (Whereupon, the deposition was  
9 concluded at 3:20 o'clock p.m.)

10 AND FURTHER DEPONENT SAITH NOT.  
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