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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: SHOW CAUSE PROCEEDING  
AGAINST SOUTHERN BELL  
TELEPHONE AND TELEGRAPH  
COMPANY FOR MISBILLING  
CUSTOMERS.

Docket No. 900960-TL

~~920260 TL~~

DEPOSITION OF

MARLENE HUGHES

The Deposition of MARLENE HUGHES, a witness in  
the above-entitled cause, taken by the Office of Public  
Counsel herein, before Steven Entelis, a Notary Public in  
and for the State of Florida at Large, at 255 North Sykes  
Creek, Merritt Island, Florida, commencing at 1:30 p.m., on  
September 1, 1993, pursuant to Notice.

COPY

DOCUMENT NUMBER-DATE

1     **Appearances:**

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7                   Commission

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19                   CHARLES BECK, ESQUIRE  
20                   Office of Public Counsel  
21                   c/o The Florida Legislature  
22                   111 West Madison Street  
23                   Room 812  
24                   Tallahassee, Florida 32399-1400

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I N D E X

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| MARLENE HUGHES  | Direct by Mr. Beck  | 4           |
|                 | Cross by Mr. Vinson | 15          |

1 THEREUPON:

2 MARLENE HUGHES

3 a witness herein, having been first duly sworn, was  
4 examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MR. BECK:

7 Q My name is Charley Beck. I am with the Office  
8 of Public Counsel.

9 I will tell you now up front that I am not  
10 going to ask you about any other service reps or any member  
11 of the Union, as far as what they may have done right or  
12 wrong. It is not my intent here to try to put blame on  
13 anybody.

14 My questions will be focused primarily on the  
15 type of service the customer received and your working  
16 conditions as a service representative.

17 As we go through the deposition, if my questions  
18 are not clear to you, would you please stop me and we will  
19 clear it up before we go any further?

20 A Yes.

21 Q Would you please state your name?

22 A Marlene Hughes.

23 Q Are you employed by Southern Bell?

24 A BellSouth Telecommunications, Southern Bell,  
25 yes.

1 Q Okay. What office do you hold with the company?

2 A Currently, OPT, which is an outside plant  
3 technician.

4 Q Would you describe briefly what that is?

5 A You have heard the song "Lineman for the  
6 County"? I am a line person for the county.

7 Q Do you repair troubles when they are reported  
8 on lines?

9 A No. I install fiberoptic cable above ground,  
10 underground and just copper wire cables.

11 Q How long have you had that position?

12 A Three weeks.

13 Q How about before that?

14 A I was a service representative.

15 Q How long were you a service representative?

16 A In Brevard County, since 1985.

17 Q Okay. Were you a service rep somewhere else  
18 before that?

19 A Miami.

20 Q How long did you do that in Miami?

21 A Seven years.

22 Q Okay. What brought you to switch from being a  
23 service rep to an outside plant technician?

24 A I have always wanted to go outside.

25 Q Was it a voluntary move on your part?

1 A Yes.

2 Q My questions are going to focus on your service  
3 representative duties.

4 A Okay.

5 Q Have you ever had occasion to have a customer  
6 call and state they had service on their bill they had not  
7 ordered?

8 A Yes.

9 Q About how often did that happen?

10 A Oh, once every couple of months, three months,  
11 whatever.

12 Q How would you deal with that when a customer  
13 called in and said that?

14 A Asked him if there might have been anyone else  
15 in the household that might have ordered or requested it,  
16 you know, roommates or spouses. Discussed it a little bit  
17 and just take action upon whatever conclusion we came to  
18 talking to the customer.

19 Q Would you refer the calls to anyone else?

20 A No.

21 Q If the person says nobody in the household had  
22 ordered the service, what would you do?

23 A Remove the service, if that is what they wanted  
24 to do, and investigate, you know, send an investigator to  
25 adjust it, for whatever time period the customer wanted it

1 off or removed.

2 Q As a service representative, did you have sales  
3 quotas that you were supposed to meet?

4 A Yes.

5 Q Do you recall what it was when you left?

6 A Quotas in dollar figures, you mean?

7 Q Yes.

8 A I don't remember exactly. It was \$34 and some  
9 change, I believe.

10 Q Daily figure?

11 A Yeah. Well, actually, yeah. Yeah.

12 MR. BEATTY: If you know.

13 BY MR. BECK:

14 Q Go ahead and explain it. Would it be an hourly  
15 figure or based --

16 A I couldn't say exactly because there were  
17 certain ranges of dollar figures that would accumulate  
18 hourly to make a daily rate, but I don't know the exact  
19 amounts to whether it would be satisfactory, less or more  
20 than satisfactory.

21 Q Were these quotas or objectives that you had,  
22 were they changed over time?

23 A They changed, yes. I can't say how often.

24 Q Do you know if the change made it more difficult  
25 or less difficult to meet the objectives?

1 MR. BEATTY: I object to the -- well, I object  
2 to the form of the question. It presupposes facts not  
3 in evidence, that it was difficult in the first place.

4 BY MR. BECK:

5 Q Go ahead. Answer the question, whether the  
6 changes made it more difficult or less difficult to meet  
7 the objectives.

8 A It would vary either way because sometimes  
9 their objective would go down and sometimes they would go  
10 up.

11 Q

12

13 A

14 Q

15 A

16 Q

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25 Q

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9 Q

10 A

11 Q Is that part of the reason you switched to being  
12 an outside plant technician?

13 A No.

14 Q Okay. Did you receive periodic appraisals from  
15 the company?

16 A Yes.

17 Q About how often did that occur?

18 A Oh, every three months.

19 Q Do you recall what you were appraised on?

20 A Three different categories. We had quantity,  
21 quality and sales.

22 Q Do you know how those were weighted?

23 A No, not offhand. I don't recall.

24 Q Was there a recent change that made those three  
25 categories for evaluation?

1 A What do you mean?

2 Q Did there used to be different criteria for  
3 appraisals?

4 A Not that I remember.

5 Q Of those three, what was your impression about,  
6 if there is one, which was the most important to the  
7 company?

8 A To the company?

9 Q Yes, ma'am. If you know.

10 A I couldn't say which was most important to the  
11 company.

12 Q Have you ever heard of a service representative  
13 adding services to customers' bills in order to meet a  
14 sales objective?

15 A No.

16 Q Have you ever heard of it being done for any  
17 reason?

18 A No.

19 Q Have you ever heard of service representatives  
20 purposely falsifying any information with respect to  
21 customers?

22 A Any service representatives?

23 Q Yes.

24 A No.

25 Q Have you ever filed a grievance with the

1 company?

2 A With the Union, yes.

3 Q I'm sorry. What was the grievance about?

4 A My end-of-year appraisal.

5 Q Was that one of them with respect to the sales  
6 objective?

7 A Not meeting my objectives in sales, yes.

8 Q What was the outcome of the grievance?

9 A Well, the outcome was they would give me a little  
10 bit more training on selling and changed -- there was like  
11 the wording was different in the appraisal itself; was just  
12 saying that I was less than satisfactory.

13 It made it seem like in all categories. I just  
14 had the wording changed to say sales.

15 Q Do you believe the sales objectives were fair?

16 A My opinion, no.

17 Q Why do you feel that way?

18 A Well, just personally my opinion, I just felt  
19 they were too high because I was not a good seller.

20 Q Okay. Did you ever have occasion to try to sell  
21 services to a customer who you felt couldn't afford the  
22 services?

23 A I'm sorry. Could you repeat that?

24 Q Have you ever had occasion where you tried to  
25 sell services to a customer who you felt couldn't afford

1 the services?

2 A Yes.

3 Q Was there a company policy to try to sell  
4 services in those conditions?

5 A Well, I think --

6 MR. BEATTY: I object to the form of the  
7 question. It is ambiguous.

8 A I was just going to say that the company didn't  
9 specify those types of concerns in particular, who to sell  
10 to.

11 BY MR. BECK:

12 Q Are you familiar with the term bridging?

13 A Yes.

14 Q Could you briefly describe what that is?

15 A Bridging would be discussing and discovering  
16 what the customers' needs were for any additional products  
17 that we might have to offer to them.

18 Q Were there any types of calls where you would  
19 not bridge?

20 A Yes.

21 Q What types of calls would you not bridge on?

22 A People that would want their services  
23 disconnected or whose services were already disconnected.

24 Q Is that the only time?

25 A Yes.

1 Q Okay. Were you supposed to bridge on all other  
2 types of calls other than the ones you just mentioned?

3 A Supposed to bridge on them all.

4 Q Yes.

5 A Company would like for you to, yes.

6 Q Okay. Do you recall what instances there were  
7 where you tried to sell services to a customer who you felt  
8 couldn't afford the services?

9 A What instances there were?

10 Q Yes. I mean, do you recall those occasions?  
11 I am looking for a specific example, if you can think of  
12 one.

13 A I am not sure I know what you mean.

14 Q I mean, do you recall why you thought the  
15 person couldn't afford the services that you were trying to  
16 sell them?

17 A Well, because they might have been calling up  
18 to, you know, their phone might have been turned off for  
19 nonpayment of the bill and they couldn't pay the bill  
20 already, but in talking with them, maybe there was something  
21 that I might have discovered, that they might have had  
22 another use for that; we might tell them a little bit about  
23 it.

24 Q Okay. Prior to the customer-centered sales  
25 approach used by the company, do you recall a sales

1 technique called the quick closing?

2 A Yes.

3 Q Would you describe what that is?

4 A The quick close to me from years ago, a long  
5 time ago, what I remember is that you would discuss with a  
6 customer the type of product that we had available and what  
7 they would do for them, and, you know, like itemize it a  
8 little, you know, itemize for them, and then tell the  
9 customer about the service, you know, what this monthly  
10 service would be.

11 Q Would you just give them one figure for the  
12 entire package?

13 A At the end, yes.

14 Q Okay. Was that a permissible approach, more  
15 recently?

16 A No.

17 Q Okay. Do you know of or have you heard of any  
18 instances where any member of management, either supervisor  
19 or higher level, was told that there was cheating going on  
20 in order to meet sales objectives?

21 A No.

22 MR. BECK: That's all I have. There may be  
23 other questions.

24

25

## CROSS EXAMINATION

1  
2 BY MR. VINSON:

3 Q Mrs. Hughes, we have talked about the criteria  
4 for evaluation and you mentioned quantity, quality and  
5 sales.

6 Do you know how the various criteria were  
7 weighted in determining overall, the overall evaluation,  
8 maybe a percentage weighting?

9 A I don't remember exactly what it was.

10 Q Okay. Do you know if that has changed within  
11 the last year?

12 I know you just changed positions, but --

13 A Yes, it has.

14 Q Okay. Would you describe the changes as you  
15 understand them?

16 A Well, years ago when I first was starting to be  
17 a service representative, we were customer services and  
18 this was on customer services, and then sales, and so I  
19 think it is kind of going back to that where there's not  
20 such an emphasis put on a percentage of sales, but customer  
21 centered selling now; more discovering, just back to the  
22 general with -- that's what I think it is going to be.

23 Q Okay.

24 A I am not too familiar with it because it just  
25 came out recently.

1 Q Right. So, would it be fair to say the  
2 evaluation that changed puts more emphasis on customer  
3 service than the prior means of determining evaluation?

4 A I wouldn't say so, much more on it. It is just  
5 a different way of emphasizing it.

6 MR. VINSON: Okay. Thank you.

7 That is the only questions I have.

8 MR. BEATTY: That's it.

9 (Thereupon, the reading and signing of this  
10 deposition were waived, and this deposition concluded at  
11 2:00 p.m.)

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