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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

~~900960-TL~~

DEPOSITION OF

GLORIA HEALEY

The Deposition of GLORIA HEALEY, 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 2:30 p.m., on
September 1, 1993, pursuant to Notice.

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1 **Appearances:**

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7 Commission

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14 Inc.

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17 Melbourne, Florida 32937
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19 CHARLES BECK, ESQUIRE
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22 111 West Madison Street
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25

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I N D E X

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THEREUPON:

GLORIA HEALEY

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

DIRECT EXAMINATION

BY MR. BECK:

Q Ms. Healey, my name is Charley Beck and I am with the Office of Public Counsel, and I will be starting off your deposition.

A Okay.

Q I want to let you know right off that I am not going to ask you the name of any service representatives or members of the Union as far as what they may or may not have done right along. That is not the intent of the deposition.

I will be asking about the type of services provided to customers, the conditions in which you worked.

If as we go through this my questions aren't clear, let me know. If you want to take a break, let me know. There is nothing to be afraid of here, although I am sure this is a threatening thing. It need not be.

So, if you want to take a break, let us know. If anybody's questions aren't clear, stop them and make sure it is clear before going forward.

A Right.

Q Could you please state your name?

1 A I know that. It is Glorida Healey.

2 Q Okay. Are you employed by Southern Bell?

3 A Yes, I am.

4 Q What position do you have with the company?

5 A I am a service representative here.

6 Q How long have you been working here in Merritt
7 Island?

8 A Merritt Island, since '85, August of '85.

9 Q Has that been as a service representative the
10 entire time?

11 A Yes.

12 Q Have you worked elsewhere for Southern Bell?

13 A Yes. In South Florida.

14 Q Okay. How long were you a service representative
15 there?

16 A Since '79.

17 Q As a service representative, have you ever had
18 an occasion where a customer calls in and tells you that
19 there were services on their bill that they had not ordered?

20 A Yes.

21 Q Could you make an estimate of about how often
22 that has occurred to you?

23 A No. I'm sorry.

24 Q Okay. What do you do when a customer calls in
25 and says that?

1 A We find out what happened.

2 Q Okay. What do they do, just tell you that the
3 services on their bill was never ordered? What do you do
4 then?

5 A I adjust it.

6 Q Is there any place that you would refer those
7 calls to?

8 A No.

9 Q Adjust it yourself and that would be the end of
10 it?

11 A I'm not sure. We have quality control and we
12 write it down on a sheet and we send it off to them.

13 If it is, somebody that says they haven't had
14 it, you know, if it has been a year or so, you know, that's
15 what they do.

16 Q Okay. Do you know how long the procedures have
17 been in effect for referring that over to quality control?

18 A Quality group.

19 Q Yes.

20 A Maybe a year or more. I don't know exactly.

21 Q Are you familiar with the term customer
22 centered sales?

23 A Yes.

24 Q Could you just very generally describe what that
25 is?

1 A That is for us to go in and try to find a need,
2 that the customer would need something, a service, and then
3 sell to that need.

4 Q Okay. Are you familiar with the term bridging?

5 A Yes.

6 Q What is that?

7 A That is if a customer called in for any reason
8 to see if they want one of our services, one of our option
9 services.

10 Q Are there any calls during which you would not
11 bridge the customer to a sales?

12 A If they call when to repair, if the customer
13 was very angry, if I didn't feel like the customer, you
14 know, had time, they were on their lunch break or something,
15 don't have time.

16 Q Do you recall what type of sales technique was
17 used by the company before customer centered sales was
18 used?

19 A No. Not offhand, no.

20 Q Have you ever heard the term quick close?

21 A Yes.

22 Q Could you describe what that is?

23 A That is packaging, we had a package with a call,
24 customer call-in service where the customer would get four
25 services, there would be a discount in it, and also offering

1 the local services as a package, and then going over it with
2 them.

3 Q Okay. Would you just give them one price for
4 the whole group of services?

5 A One price and then you go over it, yes.

6 Q Would you tell the customer which, you know,
7 separate the optional services from the required local
8 service charges?

9 A I don't remember. It has been a long time.

10 I can't remember how I did it. I don't remember
11 separating charges.

12 I remember going over all the charges. That is
13 all I can tell you.

14 Q Is that a permissible sales technique at the
15 present time?

16 A Mandatory sales technique.

17 Q I mean, the quick close?

18 A Oh, the quick close, no.

19 Q Okay. Do you know when that --

20 A I'm sorry. I thought you meant going over the
21 services.

22 Q Would you know when the use of the quick close
23 ended, the approximate time frame?

24 A That has been about three years ago, at least.

25 Q Have there ever been instances when you

1 bridged a customer to a sales presentation where you didn't
2 think the customer could afford the services?

3 A I don't understand that.

4 Q Well, let me give you an example. Suppose an
5 elderly person on a limited, fixed income called up with
6 a billing problem.

7 A Yes. Okay.

8 Q A long-distance charge that they didn't make,
9 would you normally bridge to, after taking care of their
10 billing question?

11 A I would try to bridge, yes.

12 Q Now, would you try to sell them some services
13 if you knew they were on a limited income and could just
14 barely make ends meet as it was?

15 A Where they tell me this?

16 Q Yes.

17 A Or do I know this?

18 Q Either way.

19 A I assume this -- well, I would try to bridge and
20 leave it to the customer, tell you the truth.

21 Q Would you be required to bridge on calls like
22 that?

23 A Oh, I am required to bridge on every call that
24 I feel is appropriate.

25 Q All right. It is left solely up to your

1 judgment on whether it is appropriate or not?

2 A Well, it is a judgment call, okay. The thing
3 is, I am supposed to bridge on the calls that come in.

4 Q All right.

5 A Okay? And I make that judgment, usually.

6 Q Okay. Do you receive regular appraisals as
7 part of your job here?

8 A Yes.

9 Q How often does that occur?

10 A Every six months.

11 Q Okay. Do you know what the things are that you
12 are appraised on, what kind of groups of things you are
13 appraised on?

14 A Yes.

15 Q What are they?

16 A Okay. Customer satisfaction, you know, how do
17 you handle the customer, sales.

18 Q How important is sales in your evaluation?

19 A It's important, you know. It's important as,
20 I guess, customer satisfaction, keeping my commitments. I
21 am trying to be relaxed, okay?

22 MR. REINMAN: You are doing okay. Once you
23 get started, it is easy.

24 THE WITNESS: Yes.

25

1 BY MR. BECK:

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14 A Yes.

15 Q Did somebody talk to you about that, I mean --

16 A Did my supervisor talk to me about that? Yes.

17 Q Can you recall generally what they told you
18 about that?

19 A Well, the second time, yeah. Bridging --

20 Q They told you to bridge more?

21 A Yes.

22 Q Is there anything else that you recall?

23 A I don't. All I recall on that is they had put
24 that immediate action could be taken and then we changed --
25 they got it changed to immediate action may be taken at a

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Q Okay. Without naming any names, have you ever heard of anyone ever cheating in order to meet their sales objective? Have you ever discussed that with other service representatives, for example, people have cheated on their sales in order to meet the objective?

A Yeah. There's gossip around.

Q Could you describe in a little more detail what kind of gossip there is about that?

A No. Just general statements made, you know, probably doing so hot because they cheat, this type of stuff. There is nothing specific. I don't really sit around anybody that talks about that.

Q Okay. Do you have any knowledge yourself of anybody ever cheating in order to meet the sales objectives?

1 A No.

2 Q Does this gossip go towards people whose sales
3 are higher than others?

4 A Yes.

5 Q Okay.

6 A Don't you know, anybody does good, you know,
7 like people with a lot of money, can't be happy and they
8 are probably right. Guess who is saying that?

9 Q You are not aware of any specific instances,
10 somebody cheating?

11 A Oh, no. Thank god.

12 Q Do you know whether anybody in management or any
13 supervisors have been told that people have been cheating?

14 A I imagine.

15 I don't know. You know, I don't know that. I
16 can't say that. I don't -- I'm imagining --

17 Q I just want to know your firsthand --

18 A I'm sorry. I don't know.

19 MR. REINMAN: Right.

20 BY MR. BECK:

21 Q Okay. Do you know or have you ever heard any
22 instances where service has been added to a customer's bill
23 without the customer giving an okay?

24 A Can you ask that again?

25 Q Okay. Do you either know of your own personal

1 knowledge or have you ever heard of services being added to
2 customers' bills without the customer's consent?

3 A When they call me up and tell me that, a
4 customer.

5 Q Okay. Other than that, do you have any
6 knowledge?

7 A No.

8 MR. BECK: That is all I have.

9 MR. BEATTY: Carl, I am assuming you have a
10 question?

11 CROSS EXAMINATION

12 BY MR. VINSON:

13 Q Ms. Healey, first of all, I would like to say
14 that I like you, too.

15 Let me ask you, in making bridging attempts
16 with customers, if you have ever had complaints made to you
17 about having sales bridging made to them?

18 A Has a customer ever complained to me because a
19 sales bridge was made to them?

20 Q Right. Complained that they didn't want to hear
21 a sales pitch?

22 A Yeah.

23 Q Does that happen frequently?

24 A No, it doesn't. Maybe we get them off guard.
25 They are like, we don't know they are on their way to a

1 plane or, you know, babysitting or something like that.

2 Q How do you handle those?

3 A I say okay, it was nice talking to you, goodbye.
4 I'm off the hook.

5 Q Let me ask you about the dollar amount of the
6 sales objective. If you could think back, maybe in the
7 last, say, three years, just over, you know, can you
8 picture that as the annual sales objectives -- have they
9 increased over the last three years or decreased or stayed
10 the same?

11 A I have absolutely no idea.

12 Q Okay. Are you aware of like a weekly sales
13 objective or daily sales objective?

14 A Okay. Yeah. Per hour.

15 Q Okay. Hourly?

16 A Yes.

17 Q Okay. And does that change from time to time?

18 A It has been that way for awhile, sir.

19 I don't know about the other years. I can't
20 tell you that.

21 Q So, the dollar amount is per hour? The specific
22 dollar amount may have changed from year to year?

23 A Well, I think maybe in the last one or two years
24 it has been the same, but I don't remember.

25 MR. VINSON: Okay. Those are all the questions

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I have.

Thank you.

MR. BEATTY: That's it.

(Thereupon, the reading and signing of this deposition were waived, and this deposition was concluded at 3:00 p.m.)

