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2	DECORE MUE DURITO CERUTOR COMMISCION
3	BEFORE THE PUBLIC SERVICE COMMISSION
4	In re: Show Cause proceeding) Docket No. 900960-TL
5	against Southern Bell Telephone) and Telegraph Company for) Filed: August 16, 1993 misbilling customers)
6	
7	STATE OF FLORIDA)
8	
9	COUNTY OF DUVAL)
10	Develorities of GTVDT DOOMY telegraphy to Metica of
11	Deposition of CINDI BOOTH, taken pursuant to Notice of
12	Taking Deposition, on Monday, August 30, 1993, at 301 West
13	Bay Street, Southern Bell Tower, 20th Floor, Conference Room C, commencing at 2:10 p.m., as recorded by Patricia H.
14	
15	Vierengel, CSR, RPR and Notary Public in and for the State
16	of Florida at Large.
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1	APPEARANCES
2	
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5	Office of the Public Counsel The Florida Legislature
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13	CARL S. VINSON, JR.
14	Sr. Management Analyst
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19	ROBERT G. BEATTY, ESQUIRE General Attorney BellSouth Telecommunications, Inc.
20	Museum Tower Building Suite 1910
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23	(Continued)
24	·
25	

1	APPEARANCES (Continued)
2	
3	ROBERT ESHELMAN, ESQUIRE
4	of the law firm of Kattman & Eshelman, P.A.
5	1920 San Marco Boulevard Jacksonville, Florida 32207
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7	ALSO PRESENT: Raymond E. Poucher
8	Nancy Harrison Julia August
9	Wayne Tubaugh Nancy B. White, Esquire
1Ø	Railey D. Willey Baquire
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2	WITNESS:															
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4	CINDI BOOTH														•	
5																
6	DIRECT	EXA	MINA	TION	1 B	Ÿ:										
7		MR.	BEC	к	• •	• •	• • •	• •	• • •	• •	• • •			 	Pg.	7
8		MR.	VIN	son.		• •	• • •	••	••	• •	••	• • •	• • •	 	Pg.	19
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1	ERRATA SHEET
2	DOCKET NO.: 900960-TL
3	NAME: CINDI BOOTH
4	DATE: August 30, 1993
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7	STIPULATION
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11	IT IS STIPULATED that this deposition was taken
12	pursuant to notice in accordance with the applicable Florida
13	Rules of Civil Procedure; that objections, except as to the
14	form of the question, are reserved until hearing in this
15	cause; and that the reading and signing was not waived.
16	IT IS ALSO STIPULATED that any off-the-record
17	conversations are with the consent of the deponent.
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T	CINDI BOOTH,
2	having been produced and first duly sworn as a witness
3	herein, testified as follows:
4	DIRECT EXAMINATION
5	BY MR. BECK:
6	Q Mrs. Booth, my name is Charlie Beck with the
7	Office of Public Counsel and I'm going to start off with the
8	questioning. There may be some other questions from some
9	others here, or none.
lø	It's not my intent during this deposition to ask you to
11	name any other service representatives or members of the
12	union as far as what they may or may not have done. We are
13	not taking this for disciplinary purposes. We merely want
14	to ask you questions about your job, about the environment
15	that you service the customers under. If you don't
16	understand any of the questions as I ask them, or if the
17	questions aren't clear, would you please stop me and let's
18	make it clear before we go forward. Is that agreeable?
19	A Okay.
20	Q Could you please state your name?
21	A Cindi Booth.
22	Q Are you employed by Southern Bell?
23	A No.
24	Q By whom are you employed?

A

BCI.

Which is BellSouth Communications, Inc.? 1 Q 2 Α Bell -- yeah. How long have you been employed by BCI? 3 Q About six months. A What position do you hold? 0 5 Service consultant. 6 Α Could you describe what that job entails? 7 Q Implementation of major accounts. 8 Α What does that mean, "implementation of major 9 0 10 accounts"? 11 Writing up service orders, services order requests 12 for services. 13 Are you -- Are these just certain customers that Q 14 you service? 15 Α Yes. 16 Mainly large customers? Q 17 Α Yes. 18 Q What job did you hold before that? 19 Α Service rep. 20 0 Was that with Southern Bell? 21 Α Yes. 22 Q Okay. And where were you a service rep. 23 Α Gainesville. 24 Q How long did you hold that position there?

25

Α

About six years.

Did you have any other jobs with Southern Bell or 1 Q an affiliate company before that? 2 3 A Yes. Would you describe that? 4 Q It was a service rep, but in another state. 5 Α What state was it? 6 0 North Carolina. 7 Α And for how long were you there, just very 8 0 9 roughly? As a service rep. in --10 Α 11 Yes. Q 12 Α Ten years. Do you recall what type of sales approach was used 13 Q first of all in Gainesville? Was it customer centered 14 15 sales? Yeah. Yeah. (Affirmative Response). We just 16 started that. Before it was just sales. 17 Q Do you recall the type of sales approach that was 18 19 used in North Carolina? 20 Huh-ha. (Negative Response). Α Does the term "assumptive sales technique" mean 21 22 anything to you? 23 I have heard it. Α 24 Q Do you know what it means?

Huh-ha. (Negative Response).

25

Α

- 1 That's a "No"? 0 2 A Right. 3 You'll have to do that for the --Q 4 A I'm sorry. 5 Was the customer centered sales approach just being implemented when you got to Gainesville? 6 7 Just the last three years. Approximately. Α I'm not sure. 8 9 What brought you to change positions to work for 10 BCI? 11 A I have always wanted to be a service consultant, 12 and I finally got it. It was voluntary on your part? 13 Q 14 Oh, yeah. Α Okay. Let me focus the questions, if I could, on 15 the time in Gainesville when you were a service rep there. 16 Did you get appraised in your position in Gainesville? 17 18 Α Yes. 19 Do you recall what the things were that you were Q 20 appraised on? 21 Α Sales and services. 22 In your opinion did the company emphasize one of Q
- 24 A Yes.

Q Which one?

those two more than the other?

```
1
             Α
                  Sales.
                  What were the criteria used to judge sales?
2
                                                                 I
        want to do this with each one; first sales, and then
3
        services, the things that they looked at in the appraisal
4
5
        system.
                  I have forgotten just about -- Well, just what you
6
             Α
        sold.
7
8
                  Was it dollar figures?
             Q
9
                  Yeah.
             Α
10
                  Were there certain objectives that you were
             Q
11
        supposed to meet?
12
             Α
                  Yes.
13
             Q
                  How about in the service area?
14
                  Accuracy. Quoting the right rates, giving the
             Α
        right information, and doing the paperwork correctly.
15
                  And how did they go about evaluating that?
16
             0
17
                  They listened to you.
             Α
                  Do you recall how often you'd get appraised?
18
             0
19
             Α
                  About twice a year.
20
                  Why do you think the company put more emphasis on
             Q
21
        sales?
22
             Α
                   I don't know.
23
                   No, I don't mean the purpose. You know, why did
             Q
24
        they --
```

Oh, I don't know.

25

Α

- 1 Q I don't mean the purpose of the company behind
- 2 that. What is the basis for your feeling that the company
- 3 emphasized sales more than service? --
- 4 A Will you rephrase that again?
- 5 Q Earlier you told me that you felt that the company
- 6 put more emphasis on sales than service. Do you recall
- 7 that?
- 8 A Um-ha. (Affirmative Response).
- 9 Q Why do you think that?
- 10 A Oh, because it was a higher percentage.
- 11 Q Do you recall what the percentages were?
- 12 A No, I don't.
- 13 Q Have you ever heard of people selling or putting
- down as sales to customers, or putting services on their
- bills when the customer never consented to it or agreed to
- 16 it?
- 17 A Have I ever heard of it?
- 18 Q Yes. Have you ever heard of that happening while
- 19 you were in Gainesville?
- 20 A No.
- 21 Q Do you know or -- whether anybody ever told
- 22 management that there's cheating going on?
- 23 A I have heard people say they thought so, but that
- 24 doesn't mean it was.
- 25 Q Do you know --

A I don't know of any instances. 2 Okay. Do you know of any occasions when that was Q 3 communicated to management? 4 Α No. 5 Q Are you familiar with bridging? Yep. 6 Α 7 Q Could you describe what that entails? 8 It entails the same thing as customer centered Α sales: getting information from the customer and telling 9 10 them about the services that are available that they might 11 could use from what you found out. 12 Were you required to bridge on calls people would 13 make to the -- to you as a service rep.? 14 Α Right. Were there any types of calls that you would not 15 Q 16 bridge on? Um-ha. (Affirmative Response). 17 Α 18 What types of calls? Q

1

19

20

21

22

wouldn't do that.

If somebody called in with a question about their 23 Q bill would that be the type of call where you would be 24 25 expected to bridge?

There was three, basically, but I can only

remember two of them, and they were ones that I felt strong

about: if somebody was cut off, or was irate, you normally

```
1
             Α
                  Yes.
2
             Q
                  Do you know of anyone ever being criticized by the
3
        company for not bridging when they had an opportunity to
 4
        bridge?
5
             Α
                  Yes.
 6
             Q
                  Could you generally describe those occasions?
 7
             A
                  I would say it would be a situation where it was
 8
        like a billing and the person didn't do it.
 9
                  Have you ever been either disciplined or
10
        criticized for not bridging when a bridging occasion was
11
        presented?
12
             Α
                  Yes.
13
             Q
                  Was that a frequent occurrence, do you know,
14
        within the group of service representatives?
15
             A
                   I can only speak for myself.
16
                  What was the occasion for yourself?
             Q
                   I usually did it, so it was rare.
17
             Α
                  Okay. Were you -- I asked you whether you were
18
             Q
        ever criticized or disciplined, and you said yes. Which one
19
20
        was it?
21
                   Oh. Criticized.
             Α
22
             Q
                   By whom?
23
             Α
                   My supervisor.
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Okay. Did you feel under pressure to meet sales

24

25

Q

quotas as a services rep.?

_	· · · · · · · · · · · · · · · · · · ·
2	Q And what things would make you feel like there was
3	pressure on you to achieve the sales quotas?
4	A The objective.
5	
6	
7	A Yes.
8	Q Could you describe what happened and what
9	responses you took?
LØ	
ll	
L2	
13	
14	
15	
16	
17	•
18	Q Do you think the company's emphasis on sales
19	hinders the ability of service reps. to provide good service
2 Ø	to customers?
21	A I think that would probably depend on the person.
22	Q You mean which service rep.?
23	A Right.
24	Q Can you think of any ways that it wouldn't hinder
25	the shility to provide good service?

- A Can I think of any ways that it would -
 Or do you know any ways that it did, either by
- 3 talking to the other service reps. or by your own
- 4 experience?
- 5 A Well, I would say it was rare that that would be
- the case. Like I said, it's an individual thing, you know,
- 7 where some person might, you know, not be meeting the
- 8 objective, might cut corners, you know, that might be more
- friendly to the customer or something. But I don't see how
- 10 that could be generalized because it would be an individual
- ll thing.
- 12 Q Have you ever had complaints from customers about
- trying to sell them services when they -- when they didn't
- 14 want you to try and sell them services?
- 15 A No.
- 16 Q As a service rep. you would take new orders, would
- 17 you not, from customers?
- 18 A Right.
- 19 Q And billing inquiries?
- 20 A Right.
- 21 Q Complaints?
- 22 A Right.
- Q Did you ever have occasion where a customer called
- in about a service that they didn't want?
- 25 A Yeah.

- 1 Q What would you do when that happened?
- 2 A Take it off.
- Q Okay. Did you ever have occasion when a customer said that they hadn't ordered the service and asked you to
- 5 take it off?
- 6 A Yeah.
- Q Were there any special reports made by you when a customer called in and said that they hadn't ordered the services?
- A No. And the reason being that sometimes people
 forgot and they said they didn't place the order, or their
 husband did or something, so it was hard to tell a lot of
 times if there was anything shady about it. I usually gave
 them credit.
- 15 Q You would handle it just like any other call by a 16 customer?
- 17 A Unless I thought it was something really bad,
 18 which I have never handled anything like that, but I think
 19 I probably would have.
- 20 Q How frequently do you think that happened?
- 21 A Rarely.
- Q Okay. Do you think there's been any change in the last year or two with respect to the emphasis of the company on sales?
- 25 A Yes.

What change do you think -- has there been? 1 Q Well, it's so hard to say. I feel they have 2 3 relaxed a little bit, actually. The amount of pressure isn't there anymore? 4 0 MR. BEATTY: I object to the question. That's not 5 her testimony, the witness's testimony. 6 7 You can answer the question. 8 Α What was it again? As I understand it, you said that you thought it's 9 Q been relaxed some with respect to sales pressure; is that 10 11 correct? 12 Α Right. That's correct. Would you elaborate on that? 13 Q Well, I think customer centered sales helped a lot 14 15 because it's basically tailoring the sales to the customer, 16 and that's been emphasized real strongly. Is there anything else besides that that makes you 17 Q 18 think it's been relaxed? 19 Α Huh-ha. (Negative response). 20 Q Have you ever heard of any service rep. ever 21 failing to tell the customer that a service was optional? 22 Α Have I heard it or have I heard of it? 23 Q Have you heard of it?

Okay. Do you know personally whether that's ever

24

25

A

Q

Yeah.

- 1 occurred? 2 I think as long as you have human beings there's 3 going to be people who will forget something like that. Yeah. 4 Did you ever feel that you were -- had to try to 5 sell a service to a customer when they couldnt afford it? 6 I don't feel that I would be a person that would 7 Α 8 judge that situation. I mean, how do I know if they can afford it or not? 9 10 Thank you. That's all I have. There MR. BECK: 11 may be some other questions. BY MR. VINSON: 12 Mrs. Booth, are you familiar with any recent 13 Q 14 changes in the evaluation of customer service reps.? I have been gone for six months, so --15 Α Let me back up and reask that question. 16 Q mentioned that you felt that sales had been emphasized more 17 strongly than services when we were talking about the two 18 19 parts of the job? 20 (Affirmative response). Α Um-ha. 21 And you said something about the percentage being Q
- 23 A Um-ha. (Affirmative Response).

higher?

Q During the time that you were a customer service rep. did that percentage change, or was there just one that

1	you one weighting that you worked under that you can
2	recall?
3	A I just know the last time I had one it was higher
4	Q The sales was weighted higher?
5	A Yeah.
6	MR. VINSON: Those are the only questions I have.
7	MR. BEATTY: That's it.
8	MR. BECK: Okay. Thank you very much.
9	(Witness excused).
10	(Whereupon, the deposition was concluded at 2:20 p.m.)
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2	AFFIDAVIT OF DEPONENT
3	· • • • • • • • • • • • • • • • • • • •
4	This is to certify that I, CINDI BOOTH, have read
5	the foregoing transcript of my testimony, Pages 1 through
6	20, given on August 30, 1993, in Docket No. 900960-TL, and
7	find the same to be true and correct, with the exceptions,
8	and/or corrections, if any, as shown on the errata sheet
9	attached hereto.
10	
11	
12	
13	
14	CINDI BOOTH
15	
16	SWORN to and subscribed before me this .
17	day of, 1993.
18	
19	Print name here: Notary Public - State of Florida
20	My Commission No.: My Commission expires:
21	Journal of Caption
22	
23	
24	
25	

1	
2	FLORIDA)
3	: CERTIFICATE OF OATH
4	COUNTY OF DUVAL)
5	
6	I, the undersigned authority, certify that CINDI
7	BOOTH personally appeared before me and was duly sworn.
8	WITNESS my hand and official seal this 20th day
9	of October, 1993.
1Ø	
11	
12	
13	
14	
15	Datricia H. Teeringel
16	PATRICIA H. VIERENGEL
17	Notary Public - State of Florida
18	My Commission No.: CC296027
19	My Commission expires: 6/21/97
2Ø	T DARWALL WERFNOEL
21	PATRICIA H. VIERENGEL NOTARY PUBLIC STATE OF FLORIDA MY COMMISSION EXPIRES 6/21/97 COMM. # CC 296027
22	
23	
24	

1	
2	STATE OF FLORIDA)
3	: CERTIFICATE_OF REPORTER
4	COUNTY OF DUVAL)
5	
6	I, PATRICIA H. VIERENGEL, Court Reporter, DO HEREBY
7	CERTIFY that I was authorized to and did stenographically
8	report the foregoing deposition of CINDI BOOTH;
9	I FURTHER CERTIFY that I am not a relative, employee,
10	attorney or counsel of any of the parties, nor am I a
11	relative or employee of any of the parties' attorney or
12	counsel connected with the action, nor am I financially
13	interested in the action.
14	Patricia H. Theremosel
15	PATRICIA H. VIERENGEL, Court Reporter Telephone No.: (904) 725-8657
16	STATE OF FLORIDA)
17	COUNTY OF DUVAL)
18	
19	The foregoing certificate was acknowledged before me this 36 day of October 1993, by PATRICIA H. VIERENGEL, who is personally known to me.
20	Godson n. Svon
21	Print name: Notary Public - State of Florida
22	My Commission No.:
23	My Commission expires:
24	DODSON N GROSS NOTARY PUBLIC STATE OF FLORIDA COMMISSION NO. CC186637
25	MY COMMISSION EXP. MAR. 29,1996