

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of :  
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Investigation into the :  
integrity of SOUTHERN BELL :  
TELEPHONE AND TELEGRAPH :  
COMPANY'S repair service :  
activities and reports. :  
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DOCKET NO. 910163-TL

920260 -TL

DEPOSITION OF: SHIRLEY V. PARKER

TAKEN AT THE INSTANCE OF: Florida Public Service Commission

PLACE: 666 N.W. 79th Avenue  
Room 640  
Miami, Florida

TIME: Commenced at 11:20 a.m.  
Concluded at 12:22 p.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: PAMELA A. CANELL  
Official Commission Reporter

(X-ref 6002-93)

DOCUMENT NUMBER-DATE  
06003 JUN-38

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14 Commission Staff.

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18 (305) 379-6700, appearing on behalf of the deponent  
19 Shirley V. Parker.

20

## 21 ALSO PRESENT:

22 STAN GREER, FPSC Division of Communications

23 CARL VINSON, FPSC Division of Research &  
24 Regulatory Review

25

1 APPEARANCE (Continued)

2 TERRILL BOOKER, FPSC Division of  
3 Communications

4 WALTER BAER, Office of Public Counsel

5 WAYNE TUBAUGH, Southern Bell

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S T I P U L A T I O N

IT IS STIPULATED that this deposition was taken pursuant to notice in accordance with the applicable Florida Rules of Civil Procedure; that objections, except as to the form of the question, are reserved until hearing in this cause; and that reading and signing was not waived.

IT IS ALSO STIPULATED that any off-the-record conversations are with the consent of the deponent.

## SHIRLEY V. PARKER

1  
2 appeared as a witness and, after being first duly sworn  
3 by the court reporter, testified as follows:

## EXAMINATION

BY MS. RICHARDSON:

6 Q What I would ask you to do first of all is to  
7 state your name and to spell it for the court reporter  
8 to make sure that we have it correct.

9 A Shirley V. Parker. S-H-I-R-L-E-Y, V as in  
10 Victor, middle initial, Parker, P-A-R-K-E-R.

11 Q Okay. And your address, Ms. Parker?

12 A Work or home?

13 Q Home.

14 A

15 Q And the zip code?

16 A

17 Q And your phone number?

18 A Area code

19 Q And what is your present position with the  
20 Company?

21 A Administrative reports clerk.

22 Q Is that inside an IMC?

23 A The maintenance center, yes, ma'am.

24 Q In a maintenance center. And which  
25 maintenance do you work at?

- 1 A South Dade.
- 2 Q How long have you been there?
- 3 A Approximately eight years.
- 4 Q And during that entire period of eight years,  
5 have you always been an administrative report clerk?
- 6 A Yes, ma'am.
- 7 Q And who your present supervisor?
- 8 A Tina Haney.
- 9 Q T-I-N-A, H-A-N-E-Y?
- 10 A Yes, ma'am.
- 11 Q And is she a first level?
- 12 A Yes, ma'am.
- 13 Q And has she been your supervisor the entire  
14 eight years?
- 15 A No, ma'am.
- 16 Q Who is before Tina?
- 17 A Before her, Maria Smoak.
- 18 Q About what period of time was Ms. Smoak your  
19 supervisor?
- 20 A Approximately a year.
- 21 Q So that would be '92 to '93 or '91, '92?
- 22 A '90 to '91.
- 23 Q '90 to '91. And do you remember who your  
24 supervisor was before Ms. Smoak?
- 25 A Not really.



1 Q Do you remember any other first level  
2 supervisors that you've had?

3 A Yeah, Ralph Mancusi.

4 Q And do you remember anyone else?

5 A There's so many, you know.

6 Q First level right now?

7 A Yeah, but not off hand, no.

8 Q Okay. What about your present second level  
9 supervisor?

10 A April Ivy.

11 Q And how long has Ms. Ivy been your  
12 supervisor?

13 A Two years, I believe.

14 Q So from 1991 about to the present?

15 A Yes.

16 Q And do you know who the second level  
17 supervisor was before Ms. Ivy?

18 A Shirley Perring, I believe.

19 Q And can you go back further then Ms. Perring  
20 on second level? Do you remember anyone else?

21 A Larry Rorrer.

22 Q And does that take us back to the full eight  
23 years?

24 A Yeah -- no, Hampton Booker.

25 Q Hampton Booker. And do you know who the

- 1 operation manager is over at South Dade right now?
- 2 A Tad Rubin.
- 3 Q And about how long has Mr. Rubin been there?
- 4 A Two years, maybe two and a half.
- 5 Q Around 1990 or '91?
- 6 A Yes.
- 7 Q And do you know who it was before Mr. Rubin?
- 8 A George Lewis.
- 9 Q And about what period of time was Mr. Lewis
- 10 the operation manager?
- 11 A I believe approximately two years.
- 12 Q So '88 to '90?
- 13 A Yeah.
- 14 Q Somewhere in that time frame. And do you
- 15 know who it was before Mr. Lewis?
- 16 A Issy Ferrara.
- 17 Q And that's I --
- 18 A -S-S-Y.
- 19 Q P-E-R-R-E-R-A? (sic)
- 20 A Yes, I believe.
- 21 Q Okay. And do you know how long Mr. Perera
- 22 was --
- 23 A About three years maybe. I'm not sure.
- 24 Q So we're somewhere in mid '80s?
- 25 A Yeah.

1 Q Okay. And who is the general manager?

2 A Linda Isenhour.

3 Q And do you have any idea how long she's been  
4 general manager?

5 A No.

6 Q Has it been for a number of years?

7 A For a while, yeah. A couple of years, I  
8 don't know.

9 Q Don't know. That's fine.

10 A I don't have much dealings with her, you  
11 know.

12 Q Okay. That's fine. What are your duties --  
13 before I start on that, let me ask you this.

14 Have you discussed your deposition with  
15 anyone else besides your attorney and the attorneys for  
16 Southern Bell today?

17 A No, ma'am.

18 Q Has anyone given you any assurances that you  
19 would not be disciplined based upon what you told us  
20 here today?

21 A Yes.

22 Q Has anyone discussed with you any possible  
23 penalties for not telling the truth here today?

24 A Yes.

25 Q Have you given a statement to anyone in the

1 Company prior to today?

2 A A statement?

3 Q Did anyone come and ask you questions from  
4 the Company as part of the Company's investigation?

5 A Yes.

6 Q Can you tell me who was present in the room  
7 when your statement was taken?

8 A My attorney.

9 MS. BAKER: You better rephrase and ask her  
10 again because I think she's thinking about her talking  
11 to me earlier today is what I think she's thinking  
12 about.

13 A Yeah.

14 Q (By Ms. Richardson) Prior to today's  
15 deposition?

16 A Anybody in the Company? No. They told us to  
17 tell the truth period.

18 Q Okay. Let me back up. I want to switch off  
19 to a different time. Let's go back to 1991 maybe or  
20 even '92.

21 Back in that period of time, did any attorney  
22 from the Company interview you in connection with the  
23 Company's internal investigations into the repair  
24 problems?

25 A No.

1 Q No. Okay.

2 MR. ANTHONY: Alleged repair problems.

3 MS. RICHARDSON: Alleged repair problems.

4 MS. BAKER: Can I have a moment with my  
5 client?

6 MS. RICHARDSON: Yes.

7 (Discussion off the record.)

8 MS. BAKER: Could you read back the question  
9 that you asked Ms. Parker, with respect to statements  
10 to the Company so that I can hear how it was worded.

11 (Last question read back by the reporter.)

12 A I'm sorry, I misunderstood.

13 Q (By Ms. Richardson) That's fine. I mean, if  
14 you do, please ask questions at the time.

15 A Okay.

16 Q Now, go ahead and answer.

17 A I spoke to security and there was an attorney  
18 present, but never spoke directly to the attorney to  
19 the security.

20 Q And who was the security person?

21 A Hampton Booker.

22 Q Was there anyone else in the room besides the  
23 attorney and Mr. Booker?

24 A Not that I remember, no.

25 Q Now, what are your responsibilities as an

1 administrative reports clerk?

2 A To answer telephones, to do reports, to clean  
3 the printers, take the paper off the printers and  
4 distribute whatever is printed on printers to go  
5 whoever printed information, pull trouble histories,  
6 let people in when they want to come in the building  
7 and just basically clerical work.

8 Q Okay. Answer phones is the one I want to  
9 start with. Which phones do you answer?

10 A The supervisors' lines.

11 Q The supervisors' lines. Is this sort of like  
12 a receptionist duty?

13 A Right.

14 Q Whoever calls in to the supervisors you just  
15 pass it off to whoever they want to talk to?

16 A Correct.

17 Q Is this ever answering a customer with a  
18 trouble report?

19 A Yes, customers do call in that have troubles.

20 Q And how are you directed to handle those  
21 calls?

22 A Give them to a supervisor because that's --  
23 usual they have the supervisor's phone number, and it  
24 will route it over to a main line that I will answer,  
25 and then whoever they ask for, I direct them to them

1 and if that supervisor is not there, I give them to a  
2 supervisor that can help them.

3 Q Okay. And how do they get the supervisor's  
4 phone number?

5 A I'm not sure exactly except maybe supervisor  
6 calls them, leaves their number or maybe a service tech  
7 out in the field will leave the main line number and  
8 tell them to call if they have any problems.

9 Q Okay. Is that a standard procedure, the way  
10 things operate?

11 A Yes.

12 Q I'm kind of wondering why they would call the  
13 supervisors instead of repair line?

14 MS. BAKER: Object.

15 A I wouldn't know why. I don't work outside  
16 and it's just that they call in and I direct wherever  
17 they need to go.

18 Q (By Ms. Richardson) Have you ever heard of  
19 supervisors giving instructions to repair people to  
20 tell customers to call the supervisor directly and  
21 bypass the repair lines?

22 MS. BAKER: Object to the form.

23 A Yeah.

24 MS. BAKER: You can answer. If I say object  
25 or something else, you can just listen to me and then

1 when I finish speaking, you can answer.

2 A Can you repeat that again? I'm sorry.

3 Q (By Ms. Richardson) Have you ever heard of a  
4 manager giving repair people instructions to give the  
5 manager's phone number to the customer to call the  
6 manager directly instead of calling a trouble in to the  
7 repair office?

8 MS. BAKER: Object. Go ahead and answer.

9 A Yes. Meaning that the customer may have had  
10 repeated troubles. And then the supervisor will  
11 overlook that and make sure they get the service that  
12 they need.

13 Q (By Ms. Richardson) Okay. Do you know which  
14 supervisor gave that particular instruction?

15 MS. BAKER: Object. No foundation.

16 A No, I don't.

17 Q (By Ms. Richardson) Okay. Can you give me  
18 an proximate year or time when you've heard of this  
19 being done?

20 A What we do -- no.

21 Q Is this sort of generally done?

22 A Yeah. If somebody is having problems, you  
23 know, if they need help and we try to help them as much  
24 as we can.

25 Q Do you know if when the customer calls the



1 supervisor on a trouble, if that trouble is recorded in  
2 the trouble data base?

3 A Probably more -- yeah. Usually the trouble's  
4 in there and they're calling, you know, say -- yeah,  
5 the trouble is in the data base that I know of, but I  
6 don't oversee the supervisors.

7 Q No.

8 A I don't question what they do.

9 Q Okay. Let's go on to when you told me you do  
10 reports?

11 A Yeah.

12 Q Okay. Can you explain what kind of reports  
13 you do for me?

14 A Yeah, I do reports as far as giving them  
15 figures that come on a computer, on a printer. I give  
16 them the figures, you know, make it easier for them to  
17 look and see how we're doing daily as far as missed  
18 appointment, you know, they track it and make sure what  
19 our indexes are.

20 Q Are you responsible for actually putting in  
21 the information that pulls out the reports?

22 A No.

23 Q Who is responsible for deciding what the  
24 reports --

25 A It's a data base that -- I don't know where

1 it comes from but it comes on my printer, and I take it  
2 off and take the information off the printout.

3 Q Okay. Do you work with these reports in  
4 terms of analyzing these reports?

5 A No, ma'am.

6 Q I want to make sure I'm real clear because I  
7 don't want to get wrong what you do.

8 So the report automatically shows up on your  
9 printer? It just starts spitting all of this paper out  
10 at you?

11 A Not at me.

12 Q Well, it starts coming off the printer. And  
13 your job then is to take that particular paper report  
14 off and carry it to someone else; is that correct?

15 A No. I take the paper to my desk, take the  
16 figures -- take numbers off and put it into a Fortune  
17 computer which is, you know, a word processing  
18 computer.

19 Q Okay.

20 A All right. And I put that information in,  
21 print it and then give them the information that they  
22 like to look at, you know, to see how we're doing.

23 Q So these reports then are just a bunch of  
24 numbers?

25 A Uh-huh.

1 Q And when you get to your Fortune program, is  
2 it formatted so that your answering specific lines?

3 A No, no.

4 Q Okay. Then how you data --

5 A Just like you put numbers, you know, the day  
6 of the month and then missed appointments, I Reports,  
7 you know, that -- as far as repeat reports, you know,  
8 trouble comes in repeatedly, you know, it gives us the  
9 number of the hours or the minutes that it takes for us  
10 to clear these troubles and stuff.

11 Q Okay. I think I'm clearer on this. You're  
12 doing great.

13 On your report that you put together, is this  
14 daily?

15 A Yes, ma'am.

16 Q And does the report that you put together  
17 track various requirements, objectives that the Company  
18 has?

19 MS. BAKER: Object.

20 A Yes.

21 Q (By Ms. Richardson) And you mentioned missed  
22 appointments?

23 A Uh-huh.

24 Q What's the Company objective for missed  
25 appointments?

1 MS. BAKER: If she knows.

2 A I don't know.

3 Q (By Ms. Richardson) What is an I -- and I  
4 assume that's the letter "I" not e-y-e?

5 A Right.

6 Q The letter "I", I Report? What's an I  
7 Report?

8 A Installation.

9 Q So that tracks new service being given to  
10 customers?

11 A Yes.

12 Q And does the Company have an objective for  
13 installation?

14 MS. BAKER: Object on the same grounds.

15 Q (By Ms. Richardson) But you can answer.

16 MR. ANTHONY: If she knows, she can answer.

17 A I am not sure.

18 Q (By Ms. Richardson) You're not sure?

19 A No.

20 Q Okay. You said something about R Reports.  
21 What are R Reports?

22 A No, I said repeat reports.

23 Q I'm sorry. Repeat reports. What are repeat  
24 reports?

25 A It's where a customer calls in -- I don't

1 know -- over a time frame of three months, you know, if  
2 they continue on having problems with their phone.  
3 It's a repeat report and it's repeated.

4 Q What do you count? Just the number of times  
5 a trouble repeats?

6 A No, it gives you a figure. And I don't know  
7 what these figures mean.

8 Q Okay. Do you also count out-of-service  
9 reports?

10 A Yes.

11 Q On your Fortune 500 and you also keep track --  
12 MR. ANTHONY: I don't think it's a Fortune  
13 500.

14 A It's a Fortune. It's the name of the  
15 computer.

16 Q (By Ms. Richardson) Thank you. Fortune  
17 system. Not enough sleep last night, Ms. Parker.

18 A Me neither.

19 Q Out-of-service reports. Do you just count  
20 the number of out-of-service reports?

21 A Out-of-service and out-of-service-over-24.

22 Q So we have two separate counts. Do you do  
23 anything with those two separate numbers like subtract  
24 one from the other or create a percentage or --

25 MS. BAKER: Object to the compound question.

1           A     I get figures and the computer computes them  
2 as far as whatever they need to know, the supervisors  
3 or the manager and the division level.

4           Q     (By Ms. Richardson) Is one of the numbers  
5 that is computed a number of additional out-of-service  
6 reports required to meet a 95% index?

7           MS. BAKER: Object.

8           A     You will have to rephrase that. I'm sorry.

9           Q     (By Ms. Richardson) Are you familiar with a  
10 company requirement that out-of-service reports be  
11 repaired within 24 hours?

12          A     Yes.

13          Q     Are you familiar that it be done with 95%  
14 accuracy?

15          MS. BAKER: Object to the form.

16          MR. ANTHONY: I don't think that actually  
17 states what the rule says.

18          Q     (By Ms. Richardson) Let's rephrase that  
19 because we're having problems with the questions, so  
20 wait a second.

21                   Are you aware that the Company must -- that  
22 the Company objective is to repair out-of-service  
23 reports at least 95% of the time?

24          MS. BAKER: Object.

25          Q     (By Ms. Richardson) Within 24 hours?

1           A     As far as me, personally, if a person is out  
2 of service, then we should clear that trouble as  
3 quickly as possible. For 24 hours is a long time to be  
4 without a phone.

5           Q     Okay.

6           A     As far as I know, we try to meet -- whether  
7 it's 95% or a 100%, I think we should make a 100% as  
8 far as I'm concerned.

9           Q     When you start calculating the total out of  
10 service and the out of service over 24 --

11           MR. ANTHONY: I'm going to object. I don't  
12 think that's what she said.

13           Q     (By Ms. Richardson) I'm sorry. When you  
14 work with the numbers of total out-of-service and the  
15 numbers of out-of-service-over-24, is there also a  
16 number on your report that indicates the additional  
17 out-of-service reports required?

18           MS. BAKER: Object to the form.

19           A     No.

20           Q     (By Ms. Richardson) Have you heard the terms  
21 "building the base"?

22           A     No. (Pause)

23           Q     Ms. Parker, I would like you to look at --  
24 we're not going to make it an exhibit -- a filing by  
25 Southern Bell dated April 1st, 1993, which gives a

1 listing of approximately 650 employees who may or may  
2 not have knowledge of certain things within the  
3 Company?

4 A Uh-huh.

5 Q All right. And I would you to read it and  
6 your attorney to read it, and indicate to me if you are  
7 the individual listed on Page 13, No. 455?

8 If you want to, read the initial Southern  
9 Bell statement as to what they're furnishing and the  
10 numbers and what they correspond to at the beginning.

11 (Discussion off the record.)

12 MS. BAKER: I would appreciate an opportunity  
13 for Shirley Parker to reanswer the question as to  
14 whether or not she had heard the term "building the  
15 base" before?

16 A I have heard the term, but I don't know what  
17 it is. I don't know.

18 Q (By Ms. Richardson) Can you tell me in what  
19 context you have heard the term?

20 A Somebody -- context? I don't really  
21 remember.

22 Q Has it been just recently in the last three  
23 months?

24 A Yeah, during the interview two years ago.

25 MR. ANTHONY: Can I instruct you not to



1 discuss what was discussed during the interview?

2 WITNESS PARKER: Yeah.

3 MS. RICHARDSON: On the basis of?

4 MR. ANTHONY: You know the basis. On the  
5 basis of privilege. We don't have to waste the time.

6 Q (By Ms. Richardson) And, Ms. Parker, you are  
7 not going to answer based upon counsel's claim of  
8 privilege; is that correct?

9 A Right.

10 Q All right. Ms. Parker, do you know how  
11 troubles get statused out-of-service?

12 A I believe the computer automatically does it.

13 Q Is it possible to do it by hand in the  
14 computer? Someone to --

15 A Sure.

16 MR. ANTHONY: If you know the answer.

17 A I know it can be done, but I don't know  
18 nothing about it.

19 Q (By Ms. Richardson) Okay. Do you have you  
20 any knowledge of anyone improperly statusing reports  
21 out-of-service?

22 A Not intentionally, no.

23 Q Do you have any knowledge of anyone creating  
24 fictitious trouble reports?

25 A No.

1 Q You also indicated to me that part of your  
2 job was to pull trouble histories. Can you explain how  
3 you do that?

4 A There is a mask you pull up.

5 Q M-A-S-K, mask?

6 A A mask. A mask that's in the computer that  
7 you pull up.

8 Q So it's a screen that comes up? I'm sorry.  
9 I'm slowing you down. It's a screen that comes up that  
10 you look at. That's what a mask is?

11 A Right. Okay. You put the phone number in,  
12 the history -- the time frame of that report and you  
13 pull it up and you look at it or print it or --

14 Q All right. On what occasions would you pull  
15 up my trouble history?

16 A To print it for a supervisor's information.

17 Q Okay. So a supervisor would direct you then  
18 to pull up a specific trouble number history?

19 A Right.

20 Q Would you ever do this just on your own?

21 A No. Well, there might be, you know, to look  
22 up at phone number to see.

23 Q But it would be a personal request of yours,  
24 if you did it?

25 A Right.

1 Q Do you know why a supervisor would direct you  
2 to pull up trouble histories?

3 A To analyze the trouble.

4 Q For you to analyze the trouble?

5 A No, for her.

6 Q For her to analyze the trouble.

7 A Or whoever asked me to do it for them to  
8 analyze it.

9 Q Are you familiar with operational reviews  
10 that are done on the installation maintenance centers?

11 A I know of them but I'm not familiar with  
12 them, no.

13 Q But you know they're done?

14 A Yes.

15 Q All right. And when the operational review  
16 staff comes in, do they ever ask you to pull up trouble  
17 histories for them?

18 A Yes.

19 Q Again, would they be the ones determining  
20 which trouble histories would be pulled?

21 A Yes.

22 Q You would not determine that yourself?

23 A No, ma'am.

24 Q So once the trouble histories are pulled,  
25 would you do anything with them yourself?

1 A No. (Pause)

2 Q I think I have confidential information  
3 covered.

4 MR. ANTHONY: Actually it's all confidential,  
5 including Ms. Parker's name, and then we'll deal with  
6 it later.

7 MS. RICHARDSON: Then we'll deal with it  
8 later.

9 Q (By Ms. Richardson) Okay. Ms. Parker, I'm  
10 going to show you a portion of a document produced by  
11 the Company in response to Public Counsel's Third Set  
12 of Interrogatories. And interrogatories are legal  
13 questions, written questions. And it's dated June 6th,  
14 1991, and what we asked the Company, the question we  
15 asked was for the Company to tell us the exact names,  
16 home addresses and phone numbers and business addresses  
17 and phone numbers of all persons known by the Company  
18 who have any knowledge about fictitious repair service  
19 forms, reports or records.

20 And I'm going to let you read that for  
21 yourself. I'm going to let you read the response by  
22 the Company.

23 MR. ANTHONY: Why don't you put the response  
24 in the record, too, since you read the request.

25 Q (By Ms. Richardson) All right. The response

1 is "The following the individuals may have information  
2 responsive to this interrogatory. The information  
3 contained in the enclosed response is being provided  
4 pursuant to order of the Florida Supreme Court dated  
5 February 4th, 1993. By providing the information  
6 pursuant to the Supreme Court's order, Southern Bell  
7 does not intend to waive the attorney-client privilege  
8 or work-product doctrine and reserves the right to  
9 assert the attorney-client privilege and work-product  
10 protection if this information is requested by any  
11 other person, including, but not limited to, requests  
12 that may be made in pending or future litigation,  
13 administrative proceedings or any other action or  
14 proceeding.

15 Southern Bell reserves the right to refute or  
16 contest certain of the information, beliefs, claims and  
17 conclusions that previously have been offered by the  
18 persons identified in this response or which they may  
19 offer in the future."

20 And then they have identified the subject  
21 matter about which persons identified below may have  
22 responsive information of alleged creation of  
23 fictitious trouble reports.

24  
25

1 A Yes.

2 Q I'm sorry.

3 A Yes.

4 MR. ANTHONY: I'm sorry. Excuse me, just one  
5 second.

6 MS. RICHARDSON: Are you comfortable with it  
7 as it is or do you want to go off the record a minute?

8 MS. BAKER: I would like to look at this  
9 document. Obviously, I've never seen it before.

10 (Discussion off the record.)

11 MS. BAKER: I would like to go on the record  
12 and explain something that, as Shirley's attorney, I've  
13 been able to determine, while we were off the record,  
14 which is that Shirley has no memory whatsoever of what  
15 she told the Company when she did have some  
16 communication with them about this matter two years  
17 ago. And, in fact, as she sits here today, she is  
18 having a very, very hard time remembering anything  
19 about the events that are of interest to Public  
20 Counsel.

21 This last year she suffered terribly during  
22 Hurricane Andrew, which has set her whole mental state  
23 back, so that, in fact, she has shared with us that she  
24 has, in general, an awfully hard time remembering  
25 anything really clearly that happened before the

1 hurricane. And this may or may not have been elicited  
2 or heard from other of the Southern Bell employees, but  
3 certainly among those that my office represents, this  
4 has been a --

5 MS. RICHARDSON: Traumatic?

6 MS. BAKER: Well, it's been a definite factor  
7 in the mental state of quite a number of the employees,  
8 that they feel their lives still completely  
9 discombobulated because of that storm. And with lives  
10 that become fractured and disorganized, they feel that  
11 their ability to remember back and clearly recollect  
12 facts has really been impaired.

13 And if you were to study this at all, I think  
14 that you would find that psychologists bear this out,  
15 that people who undergo traumatic stress, as many of  
16 these employees have, and I think this applies to  
17 Shirley, do have impacts afterwards which affect their  
18 memory.

19 Now, whether that's -- how much of a factor  
20 that is in Shirley's case, it's certainly hard for us  
21 to tell. But as she sits here today, she really does  
22 not have specific memory of what she told the Company  
23 two years ago, if she told them anything. And I wasn't  
24 there and I've had no access to any reports that the  
25 Company may have prepared, so I have no idea whether

1 she told them anything. But she doesn't remember what  
2 she told them.

3 And when she answered certain questions  
4 earlier before the break that she didn't know certain  
5 information, that's as she sits here today but for her  
6 to answer "I don't know certain information" is -- she  
7 would give that same answer to information that she  
8 once knew and now can't remember that she ever knew it  
9 or that she never knew and now still doesn't know.

10 In her mind, if she doesn't have a memory of  
11 it today, her answer has been "I don't know." And she  
12 hasn't made the distinction that lawyers like to make  
13 about, "Well, I once knew it at an early time, but I  
14 don't recall it today," or "I don't know it at all."  
15 It's a distinction lawyers might make, but that's not a  
16 distinction that Shirley is able to make or has made.

17 MS. RICHARDSON: Okay. Do we have a question  
18 on the record?

19 THE REPORTER: No.

20 Q (By Ms. Richardson) Mr. Parker, have you  
21 ever heard of anyone creating fictitious trouble  
22 reports?

23 A Heard of?

24 Q Yes.

25 A I'm not sure how to answer that question.



1 Q Okay. Let's say that you didn't have any  
2 personal direct knowledge of watching someone create  
3 fictitious trouble reports, but maybe you've heard  
4 about it talking to other employees or you've heard  
5 other employees talking -- overheard other employees  
6 talking about creating fictitious trouble reports in  
7 that kind of sense?

8 MS. BAKER: I'm just going to object to the  
9 form for the record.

10 A I don't -- I can't answer that. I really  
11 can't.

12 Q (By Ms. Richardson) Do you know what a  
13 trouble report is?

14 A Yes.

15 Q And is a trouble report a record of a  
16 customer calling in with a problem on the line and  
17 asking the Company to fix it?

18 A Correct.

19 Q Do you know if it's possible for an employee  
20 to create a report when no customer has called in a  
21 trouble?

22 A Yes.

23 Q You know that's possible?

24 A Yes.

25 Q Have you ever --

1 MS. BAKER: I don't know that the witness  
2 answered that last question.

3 MS. RICHARDSON: I thought I heard a yes.

4 MS. BAKER: Did the reporter get a yes?

5 THE REPORTER: Yes.

6 MS. BAKER: I didn't hear you.

7 A Well, let me talk to you. I don't want to do  
8 anything wrong here at all.

9 MS. RICHARDSON: That's fine. She just  
10 didn't hear.

11 MS. BAKER: I just didn't hear your answer.  
12 You're doing fine.

13 Q (By Ms. Richardson) You're speaking so  
14 softly that sometimes we don't hear you, that's all.

15 Do you know of anyone who has created a  
16 trouble report without a customer calling in?

17 A Yes.

18 Q Under what conditions have they done that?

19 A For cable locations.

20 Q Can you explain a little bit more about that?

21 I don't quite understand what you mean "for cable  
22 locations"?

23 A When a customer is going to dig, you know,  
24 trench or whatever, they call for a cable location.  
25 And we put in a trouble report for a cable repairman to

1 go and mark the lines so they get credit for their  
2 work, but that's not really fictitious.

3 Q Right.

4 A It's not a trouble, but they have to get  
5 credit for what they do.

6 Q Would that be called a message report?

7 A I wouldn't know.

8 Q You wouldn't know.

9 A For certain, it might be. I don't know for  
10 sure.

11 Q Do you know of any other circumstances when  
12 an employee would create a trouble report?

13 A Not personally, no.

14 Q Have you ever heard of an employee creating a  
15 trouble report when a customer has not called in?

16 A I'm not sure.

17 Q You don't recall? You may have but you don't  
18 remember?

19 A No.

20 Q All right. Ms. Parker, I want to thank you  
21 for coming, and I appreciate the trauma you've been  
22 under and the stress that you've been under here today.  
23 And I want to thank you and I don't think I've got any  
24 more questions. If somebody jogs my memory, I may have  
25 one or two before you go. The Commission may have a

1 few for you.

2 MS. WILSON: We have no questions.

3 MR. ANTHONY: I don't have any questions, Ms.

4 Parker. Thank you.

5 MS. BAKER: No questions.

6 MS. RICHARDSON: No questions. No redirect.

7 Thank you, Ms. Parker.

8 (Thereupon, the deposition concluded at 12:22

9 p.m.)

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This is to certify that I, SHIRLEY V. PARKER, have read the foregoing transcription of my testimony, Page 1 through 36, given on April 20, 1993 in Docket No. 910163-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

\_\_\_\_\_  
SHIRLEY V. PARKER

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_

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NOTARY PUBLIC

State of \_\_\_\_\_

My Commission Expires:

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F L O R I D A )  
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C O U N T Y O F L E O N )

CERTIFICATE OF OATH

I, the undersigned authority, certify that  
SHIRLEY V. PARKER personally appeared before me and was  
duly sworn.

WITNESS my hand and official seal this  
12<sup>th</sup> day of May, 1993.

*Pamela A. Canell*

PAMELA A. CANELL  
Notary Public - State of Florida



PAMELA A. CANELL  
MY COMMISSION # CC 246413 EXPIRES  
December 16, 1996  
BONDED THRU TROY FARM INSURANCE, INC.

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STATE OF FLORIDA)  
: CERTIFICATE OF REPORTER  
COUNTY OF LEON )

I, PAMELA A. CANELL Official Commission Reporter,  
DO HEREBY CERTIFY that I was authorized to and did stenographically report the foregoing deposition of SHIRLEY V. PARKER

I FURTHER CERTIFY that this transcript, consisting of 36 pages, constitutes a true record of the testimony given by the witness.

I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

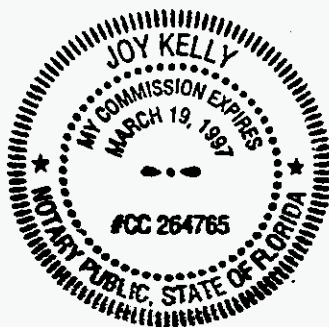
DATED this 12<sup>th</sup> day of May, 1993.

Pamela A. Canell  
PAMELA A. CANELL  
Official Commission Reporter  
Telephone No. (904) 488-5981

STATE OF FLORIDA)  
:  
COUNTY OF LEON )

The foregoing certificate was acknowledged before me this 12 day of May, 1993, by PAMELA A. CANELL, who is personally known to me.

Joy Kelly  
Joy Kelly  
Notary Public - State of Florida







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BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

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In the Matter of :  
:  
Investigation into the :  
integrity of SOUTHERN BELL :  
TELEPHONE AND TELEGRAPH :  
COMPANY'S repair service :  
activities and reports. :  
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DOCKET NO. 910163-TL

DEPOSITION OF: SHIRLEY V. PARKER

TAKEN AT THE INSTANCE OF: Florida Public Service  
Commission

PLACE: 666 N.W. 79th Avenue  
Room 640  
Miami, Florida

TIME: Commenced at 11:20 a.m.  
Concluded at 12:22 p.m.

DATE: Tuesday, April 20, 1993

REPORTED BY: PAMELA A. CANELL  
Official Commission Reporter

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AFFIDAVIT OF DEPONENT

This is to certify that I, SHIRLEY V. PARKER, have read the foregoing transcription of my testimony, Page 1 through 36, given on April 20, 1993 in Docket No. 910163-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

*Shirley V. Parker*  
SHIRLEY V. PARKER

Sworn to and subscribed before me this 17<sup>th</sup> day of Aug, 1993

*Gladys A. Guadalupe*  
NOTARY PUBLIC

State of Florida

My Commission Expires:

