

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION **SCANNED**

In re: Show Cause proceeding) Docket No. 900960-TL
against Southern Bell Telephone)
and Telegraph Company for) *920260*
misbilling customers)

CERTIFIED COPY

DEPOSITION OF LINDA HUNT

DATE: September 2nd, 1993
TIME: 9:00 o'clock a.m.
PLACE: 3300 Okeechobee Road
Fort Pierce, Florida
REPORTER: Rise J. Holmes
Notary Public
State of Florida at Large
TAKEN BY: Office of Public Counsel

APPEARANCES:

FOR CITIZENS OF OFFICE of PUBLIC COUNSEL
STATE OF FLORIDA c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Fl 32399-1400
BY: CHARLES J. BECK, ESQ.

FOR PUBLIC JEAN R. WILSON, ESQ.
SERVICE Counsel for Commission Staff
COMMISSION Public Service Commission
101 East Gaines Street
Tallahassee, Fl 32399-0872

CARL S. VINSON, JR.
Bureau of Regulatory Review
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Fl 32399-0872

DOCUMENT NUMBER-DATE

11006 OCT 13 88

1 FOR SOUTHERN BELL ROBERT G. BEATTY, ESQ.
2 General Attorney
3 BellSouth Telecommunications, Inc.
4 Museum Tower Building
5 Suite 1910, 150 West Flagler Street
6 Miami, Florida 33130

7 FOR THE WITNESS MESSER & RAY
8 8000 U.S. 1, Suite 400
9 Riverside Bank Bldg.
10 Port St. Lucie Fl 34952
11 BY: CHARLES EDWIN RAY, ESQ.

12 Also Present: Michael Tartaglio, Pres.
13 C.W.A. Local 3111
14 and
15 Peggy Ward, area Rep.
16 C.W.A. Local 3111

17 I-N-D-E-X

18 Direct Cross Redirect Recross

19 By Mr. Beck

20 3

1 And thereupon,

2 LINDA HUNT,

3 having been first duly sworn, testified on her oath as
4 follows:

5 DIRECT EXAMINATION

6 BY MR. BECK:

7 Q. Mrs. Hunt, my name is Charlie Beck. I am
8 with the Office of Public Counsel, and I will be starting
9 off with the questions. There are members of the Florida
10 Public Service Commission here who may have some
11 questions also.

12 Would you please state your name?

13 A. Linda H hunt.

14 MR. RAY: At this point in time -- my name
15 is Charles Ray. My client is agreeing to appear
16 today under a promise by the Southern Bell
17 Telephone Company, by and through their counsel,
18 that no disciplinary action will be taken against
19 my client for voluntarily appearing, telling the
20 truth, and being subject to questioning about
21 certain activities. I note counsel for the
22 corporation is present in this room today.

23 Go ahead, Mr. Beck.

24 BY MR. BECK:

25 Q. Mrs. Hunt, are you employed by Southern

1 Bell?

2 A. I respectfully refuse to answer on the
3 grounds it may tend to incriminate me under my right
4 pursuant to the Fifth and Fourteenth Amendment of the
5 Unites States Constitution.

6 Q. Have you added services to customers' bills
7 without getting consent?

8 A. I respectfully refuse to answer on the
9 grounds it may tend to incriminate me. This refusal is
10 pursuant to my right under the Fifth and Fourteenth
11 Amendments to the United States Constitution.

12 MR. BEATTY: Can we agree to the
13 abbreviated --

14 Q. Do you know if any other people who work for
15 Southern Bell have added services to customers' bills
16 without getting the consent of the customer?

17 MR. RAY: I believe we're agreeing that
18 saying "I take the Fifth," will be sufficient.

19 A. I take the Fifth.

20 Q. Do you know whether any customers' bills
21 have been falsified in any manner by anybody working for
22 Southern Bell?

23 A. I take the Fifth.

24 MR. BECK: That is all I have.

25 MS. WILSON: I have no questions.

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MR. RAY: With my consent you can call her
back.

BY MR. BECK

Q. Mrs. Hunt, could you please tell me your
home address?

A.

MR. BECK: Thank you very much.

(Whereupon, the deposition concluded at 9:10
a.m.)

1 STATE OF FLORIDA)

2 ss.

3 COUNTY OF MARTIN)

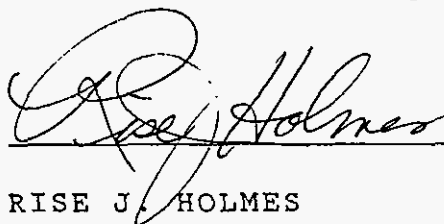
4 CERTIFICATE

5

6 I, RISE J. HOLMES, a Notary Public of the
7 State of Florida at Large, authorized to administer
8 oaths, certify that LINDA HUNT, was by me first duly
9 sworn to tell the truth this 2nd of September, 1993.

10

11



12

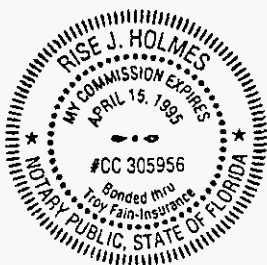
RISE J. HOLMES

13

My Commission Expires:

14

April 15, 1995



15

16

17 STATE OF FLORIDA)

18 ss.

19 COUNTY OF MARTIN)

20 CERTIFICATE

21 I RISE J. HOLMES, a shorthand reporter and
22 Notary Public of the State of Florida at Large certify
23 that the foregoing deposition of LINDA HUNT,
24 stenographically reported by me and is a true and
25 accurate transcription of said deposition of LINDA HUNT.

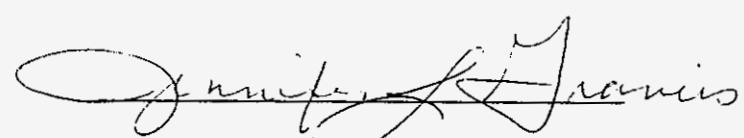
I CERTIFY FURTHER that I am neither attorney

1 nor counsel for, nor related to, nor employed by any of
 2 the parties to the action in which the deposition was
 3 taken and, further, I am not a relative or an employee of
 4 any attorney or counsel employed in this case, nor am I
 5 financially interested in the outcome of this action.

6
 7
 8 

9 RISE J. HOLMES

10
 11
 12 The foregoing was acknowledged before me by
 13 RISE J. HOLMES and who _____ did or ~~did not~~ take an oath
 14 this 17 day of September.

15
 16
 17 

18 NOTARY PUBLIC

19 My Commission Expires:

20 _____



JENNIFER L. GRANIS
 MY COMMISSION # CC310225 EXPIRES
 August 23, 1997
 BONDED THRU TROY FAIR INSURANCE, INC.