

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL

**CERTIFIED
COPY**

In re: Petition on behalf of CITIZENS
OF THE STATE OF FLORIDA to initiate
investigation into integrity of SOUTHERN
BELL TELEPHONE & TELEGRAPH COMPANY'S
repair service activities and reports.

- - -
DEPOSITION OF ROBERT CORRIVEAU, TAKEN AT THE
INSTANCE OF THE OFFICE OF THE PUBLIC COUNSEL.
- - -

Lake Worth, Florida
June 15, 1993
3:09 p.m. - 4:51 p.m.

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I N D E X

WITNESS: ROBERT CORRIVEAU

	Direct	Cross	Redirect	Recross
BY: MS. RICHARDSON	5			
BY: MR. TYNAN		71		

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E X H I B I T S

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STIPULATION

It is hereby stipulated and agreed by and between counsel for the respective parties that:

MR. BEATTY: I am going to make one statement, and that is the company has represented to each and every employee in this city and in every city that with regard to the depositions in this proceeding that no employee will be disciplined based upon their testimony in this proceeding, provided they have testified truthfully.

* * * * *

The deposition of ROBERT CORRIVEAU was taken before me, KIMBERLY C. AYERS, Professional Reporter and Notary Public, State of Florida at Large, at 120 North K Street, City of Lake Worth, County of Palm Beach, State of Florida, beginning at the hour of 3:09 p.m. on June 15, 1993, pursuant to Notice filed herein, at the instance of the Office of the Public Counsel, in the above-titled cause.

- - -

THEREUPON,

ROBERT CORRIVEAU,

Being by me first duly sworn to testify the whole truth as hereinafter certified, testifies as follows:

DIRECT EXAMINATION

1
2 BY MS. RICHARDSON:

3 Q. Would you please state your name and spell it for
4 the court reporter?

5 A. Robert W. Corriveau, C-o-r-r-i-v-e-a-u.

6 Q. And your address?

7 A. 1201 Barnett Drive.

8 Q. And is that in Lake Worth?

9 A. Lake Worth.

10 Q. Do you know the zip code?

11 A. No. That's the address at work.

12 Q. Okay. And your phone number?

13 A. 586-8900.

14 Q. And are you represented by an attorney here
15 today?

16 A. Yes, I am.

17 Q. I'll ask him to put his appearance on record.

18 MR. TYNAN: John P. Tynan, T-y-n-a-n. I'm an
19 attorney admitted to practice law in the state of
20 Florida and I'm representing Mr. Corriveau. My
21 address is 212 South Old Dixie Highway, Jupiter,
22 Florida, 33458.

23 BY MS. RICHARDSON:

24 Q. Okay. Mr. Corriveau, were you advised that you
25 would not be disciplined for any answers that you might give

1 here today?

2 A. Uh-huh.

3 Q. And I need a yes or no.

4 A. Yes.

5 Q. And have you given a statement to a company
6 investigator in the past?

7 A. Yes, I have.

8 Q. And do you know when that was?

9 A. No, I don't know the exact date.

10 Q. Was it in '91, maybe?

11 A. I'm not sure.

12 Q. A year ago, two years ago maybe?

13 A. Yeah, probably right around that time.

14 Q. And do you know who was in the room with you when
15 you gave that statement?

16 A. There was an attorney, company attorney,
17 security, I'm trying to think of his name, George Nicholson.
18 I think it was just the three of us. I don't remember, but
19 I think there might have been a fourth person. I'm not
20 sure.

21 Q. Was your supervisor there?

22 A. No.

23 Q. Do you know if your operations manager was there?

24 A. No. It might have been another attorney, if
25 there was a fourth person. I don't think there was.

1 Q. Did you have an attorney there at that time?

2 A. No.

3 Q. Did you discuss this deposition with anybody,
4 the one that we're having today? Did you discuss this
5 deposition with anyone other than your attorney or the
6 attorneys for Southern Bell?

7 A. Not in any detail. Just people knew that I was
8 coming here and that I was giving one.

9 Q. Did you make more than one statement to the
10 company?

11 A. No, just one.

12 Q. Did you discuss that statement that you made to
13 the company with anybody?

14 A. No.

15 Q. What's your present position?

16 A. I'm a field control manager.

17 Q. Is that a first level?

18 A. First level job, uh-huh.

19 Q. Has anyone advised you of the possible criminal
20 penalties if you perjure your testimony here today?

21 A. Yeah, I think they covered that.

22 Q. How long have you been a field control manager?

23 A. Went out March, I think it's March. Two and a
24 half years ago. About two and a half years. I was -- I
25 think it was, yeah, two years ago March or three years ago

1 March. One or the other. Prior to that I was in the
2 maintenance center for a year and a half, and prior to that
3 I had a crew for about ten months outside -- an outside crew
4 up in Jupiter.

5 Q. And when you were working the outside crew, was
6 that residence and business?

7 A. Just residence. I'm sorry residence and
8 business, that's correct, yeah.

9 Q. Was it repair and installation?

10 A. Correct.

11 Q. Did you also supervise any cable repair?

12 A. No.

13 Q. And do you know -- how long did you hold that
14 position in Jupiter?

15 A. I'm not sure. Probably less than a year.

16 Q. How long have you been with the company all
17 together?

18 A. About twenty-four years.

19 Q. What did you begin -- what was your entry level
20 position?

21 A. Installation repairman.

22 Q. And was that in Florida?

23 A. Yes, it was.

24 Q. Was it right here in this area?

25 A. No, it was in Margate, Coral Springs area. South

1 area.

2 Q. Is that Broward or Dade, Margate?

3 A. Broward.

4 Q. I should know that. You said you were -- let me
5 get this correct now. Did you say you were an MA or a
6 manager for maintenance administrators?

7 A. Manager for a year and a half -- wait a minute.

8 Q. Field control manager for about two and a half
9 years ago March, and then you said something about
10 maintenance administrator for about year and a half.

11 A. I also had a maintenance crew outside.

12 Q. I misunderstood stood. And was that the Jupiter
13 area?

14 A. Jupiter.

15 Q. Okay. Then between Jupiter and your field
16 control manager position did you hold another position
17 between those two?

18 A. Yes.

19 Q. What was that one?

20 A. I was manager in the maintenance center.
21 Assistant manager in the maintenance center.

22 Q. Which center was it?

23 A. This one right here.

24 Q. And who was your manager above you while you were
25 here in Lake Worth as an assistant manager

- 1 A. Tom Crampton.
- 2 Q. Who was the operation manager at that time?
- 3 A. Jean Davis.
- 4 Q. Who is your present manager?
- 5 A. Richard Driggers.
- 6 Q. Can you spell that?
- 7 A. D-r-i-g-g-e-r-s.
- 8 Q. Just like it sounds. Who's your present
- 9 operations manager?
- 10 A. George Lewis.
- 11 Q. When you were in Jupiter, who was your manager
- 12 while you were handling the Jupiter installation?
- 13 A. Lee Carhart.
- 14 Q. And who was the operation manager during that
- 15 period of time?
- 16 A. I think it was Davis. There was a switch right
- 17 around that time somewhere, but I think Davis was operation
- 18 manager because he's the one that brought me in the
- 19 maintenance center from outside.
- 20 Q. Jean Davis?
- 21 A. Uh-huh.
- 22 Q. Was Mr. Carhart the only second level manager you
- 23 had in Jupiter, or did you have more than one?
- 24 A. No, just Lee Carhart.
- 25 Q. And in Lake Worth was Mr. Crampton your only

1 second level or was there another second level that you
2 reported to also?

3 A. What timeframe are you referring to?

4 Q. While you were an assistant manager in the Lake
5 Worth Center?

6 A. Right here?

7 Q. Yes.

8 A. Crampton, I think was. I don't think I worked
9 for Paul. I think it was just Crampton and then I went out
10 about the time they switched again. I know them very well,
11 we're good friends.

12 Q. But you definitely remember Mr. Crampton?

13 A. Oh, yeah.

14 Q. Did you ever work for Butch Olson?

15 A. No.

16 Q. Do you know a Mike Doudee (phonetic)?

17 A. I know Mike Doudee, yes.

18 Q. Did you ever work with Mike Doudee?

19 A. No. Not with Mike Doudee, no.

20 Q. Did either you or Mike ever have complimentary
21 work duties?

22 A. Mike was first line supervisor, I think, at the
23 time, and our paths crossed a lot. But we never shared any
24 responsibilities, no.

25 Q. Did either of you ever work with the same crew at

1 any time?

2 A. No.

3 Q. Did Mr. Doudee ever train any of your outside
4 crew?

5 A. Not to my knowledge.

6 Q. Okay, Mr. Corriveau, I'm going to show you a
7 document that's entitled citizen's third set of
8 interrogatories. An interrogatory is a question I put down
9 in writing and mail to the company and they send me their
10 answer back in writing. This is dated June 6th, 1991. And
11 we asked the company to give us the names of employees who
12 had knowledge about falsifying completion times on repair
13 reports, and the company gave us the name of some employees
14 that might have some information about that. Now, what I'm
15 going to do is allow you to take a look at this, and if you
16 have any questions for your attorney or whatever, we'll do
17 that off the record, okay. But this is paper clipped like
18 this because all of the names you don't see are
19 confidential, so we ask that you don't turn it over and look
20 at it because the company has a claim for confidentiality on
21 it.

22 A. Okay. I left my glasses downstairs. You want me
23 to read this whole thing? Do I need to read this whole
24 thing?

25 Q. That's up to you.

1 A. What am I basically looking at?

2 Q. First of all,

3

4 A.

5 Q. What I'd like to know is what you know about
6 backing up clearing times on trouble reports?

7 A. What do I know about backing up clearing times on
8 trouble reports. That it was -- that we were backing up a
9 time on a trouble report if the actual time that it was
10 cleared -- say a repairman in the field got dispatched out
11 on a trouble report and he cleared the job at say 8:00 and
12 say he called it in an hour later, he was to back up the
13 time to whenever the trouble was actually cleared.

14 Q. Are you aware of the company's requirement that
15 out of service reports be cleared within 24 hours at least
16 95% of the time?

17 A. Yes, I am.

18 Q. And have you known that -- how long have you
19 known that requirement?

20 A. Specifically I don't know how long I've known
21 it. I just --

22 MR. BEATTY: If you know.

23 THE WITNESS: I'm just trying to remember. I
24 was aware of it for a long time, so -- I mean, I
25 spent a long time in the maintenance center.

1 There were requirements that came down from the
2 PSC on the way we stasured.

3 BY MS. RICHARDSON:

4 Q. Do you know if that's a PSC requirement that out
5 of service reports be cleared within 24 hours?

6 A. I believe it is, but I'm not sure. I believe it
7 is.

8 Q. Do you know of any instances where individuals
9 have reported a clearing time on a report that was
10 inaccurate just to meet that 24 hour commitment?

11 A. No.

12 Q. Do you know of anyone who has backed up clearing
13 times in order to help them -- help the company meet that 24
14 hour requirement?

15 A. Absolutely not, no.

16 Q. I'm going to show you another section of this
17 document. This is again citizen's third set of
18 interrogatories, but this is item number eight. And we
19 asked the company to identify the names of employees who had
20 knowledge about subscriber repair reports recorded or
21 reported as employee repair reports, and the company
22 responded with some names of individuals who might have some
23 knowledge about the creation of employee originated reports
24 for customers who called or were called concerning repeat
25 problems. And we'll go off the record and give you a chance

1 to look at that.

2 (Whereupon a brief discussion was held off
3 the record.)

4 THE WITNESS: Okay.

5 BY MS. RICHARDSON:

6 Q.

7 A.

8 Q.

9 A. Yes, ma'am.

10 Q. And can you explain to me what an employee
11 originated report is?

12 A. An employee -- that would be a report that was
13 originated here in the maintenance center, okay.

14 Q. What's the customer direct report?

15 A. That would be where the customer calls into the
16 centralized repair to make a direct report to the people in
17 centralized repair. Or a customer that directly makes a
18 report to us for a troubled condition on their line, I
19 guess. Yeah, okay, yeah.

20 Q. If a customer saw a repairman working across the
21 street and went over and told the repairman that the
22 customer's phone was out of service, would he please report
23 it for the customer, and the repairman phoned it in, is that
24 going to be a customer direct or employee originated?

25 A. Customer direct.

1 Q. Do you know of any instances where managers told
2 the STs to give customers a special call in number to the
3 IMC to report problems if they had repeat troubles?

4 A. Yes.

5 Q. And when the customer called the IMC number
6 instead of the CRSAB to report the repeat trouble, were
7 those troubles customer direct or employee originated?

8 A. Both. Some of them were customer direct, some of
9 them were employee originated. I can remember them being
10 both ways.

11 Q. Which one's were employee originated?

12 A. If the customer was not out of service you would
13 generate a customer relayed report. The intent of that
14 being to -- these were only customers that were experiencing
15 a lot of trouble on their line. Two or three repeated
16 reports. I was involved in the program myself. The intent
17 was to give the best service that we could give. It would
18 be -- immediately a report would be made not knowing at that
19 time whether or not the trouble was going to be there.
20 These are troubles that are there, not there, we would
21 continue to dispatch on them.

22 If the problem -- the intent was to get out there
23 as quickly as we could. I would get repairmen to try to
24 capture the line to determine where the trouble was.
25 Sometimes if the customer was out of service it was made up

1 as a customer direct and we would dispatch. If it was a
2 noisy condition that we had been unable to isolate at
3 previous visits, then we would make an EO report.

4 The intent was to expedite getting that
5 customer's problem resolved. I handled a lot of repeats
6 that came through there as part of my job. And that was the
7 intent, of only giving good service.

8 Q. Giving that the intent was to give good service,
9 was it proper to take those customer reports and make them
10 EO reports?

11 A. I feel -- yeah, because I don't know --

12 MR. BEATTY: In your opinion.

13 THE WITNESS: In my opinion, yeah. I was
14 bending over backwards to do everything I could
15 to save that customer -- I didn't see a
16 difference it would make if it was an EO or not.
17 I don't know how it got to be an EO or direct,
18 I'm not sure. I'm sure I was trying to save the
19 company the repeat report and give service at the
20 same time. And, yes, I thought I was doing the
21 right thing.

22 BY MS. RICHARDSON:

23 Q. Okay. Looking at the response to citizen's
24 interrogatory number three where the company indicates
25 creation of employee originated reports for customers who

1 called or were called concerning repeat problems, is there
2 anything in regard to this response that you can tell me
3 about that you have not already spoken to?

4 A. Yes, it was the program -- when it was brought to
5 my attention that I was probably not doing it right, the
6 program was abandoned. It probably went on for a few
7 months. When it was brought to my attention by another
8 manager that I couldn't be doing that, I changed it
9 immediately.

10 Q. And why did he tell you that you couldn't be
11 doing that?

12 A. Well, because he thought that they should be
13 customer direct. Any time a customer calls or refers
14 anything to a Southern Bell employee it should be
15 customer direct. I beg to differ with him, but I did change
16 the policy. If I can remember -- yeah, I did change the
17 policy, but that's pretty much -- I had a discussion with
18 that particular employee. He brought it to my attention.

19 Q. Who was it that brought it to your attention?

20 A. Am I supposed to give you the name?

21 Q. Did you discuss this procedure with Mr. Crampton
22 before you put it in place?

23 A. I didn't initiate it. For some reason the cards
24 were already being handed out and my clerks were taking the
25 calls. And I was assigned the repeat job, so I took it on

1 my own to do. My clerks were the ones that were taking the
2 phone calls and I was assigned the repeat reports to do.
3 So, the cards were already being handed out, so I probably
4 initiated -- I was just trying to handle it the best I could
5 to get them out there, to get the customers service. I know
6 I had not discussed it with Crampton. I'm not sure whether
7 he's aware of it. I don't know.

8 Q. Who assigned you to repeat reports?

9 A. Mr. Davis.

10 Q. Was it Jean Davis?

11 A. Yes, sir. Yes, ma'am. I'm sorry.

12 Q. That's okay.

13 A. Yes.

14 Q. And then can you tell me who was handing the
15 cards out; who had the cards printed up to hand out?

16 A. I'm not sure how it started, the cards being
17 printed up, but I know all of the employees had cards with
18 their names on them.

19 Q. What else was on there besides the employee's
20 name?

21 A. I don't remember.

22 Q. Was there a phone number for the customer to
23 call?

24 A. Yeah, I think it was the clerks number in here.

25 Q. Okay, in other words, the number would be on the

1 card so that the customer would have a phone number at the
2 IMC to call rather than call through the published repair
3 service number?

4 A. These weren't given to everybody. We weren't --
5 these were just customers that we cannot resolve their
6 problem. We went out there and couldn't find a problem and
7 couldn't resolve that problem and it was a known chronic
8 complainer and those were the only ones. Because I would
9 venture to say that I wouldn't get more than four or five a
10 week. Well, I take that back. It depended upon whether it
11 was raining out or not. Sometimes we would get a few
12 during the week, sometimes we'd go a week or two without
13 any. But when it would rain or something we'd get more of
14 them. But it wasn't a lot. It wasn't a job where they just
15 had to do that. These were calls that came in sporadically.
16 Probably just a few a week.

17 Q. Did your repeat report rates go up after you
18 stopped the program?

19 A. Go up?

20 Q. Yes.

21 A. No. I made some customers happy but I was unable
22 to make a big difference in the repeat reports.

23 Q. I want to see if I can put my finger on -- the
24 only reason it stopped was that Mr. Bryant talked to you
25 about it; is that accurate?

1 A. No, the program didn't stop completely. We still
2 had it, but we just started making everything customer
3 direct reports. We still continued to -- I don't know if
4 they're doing it now. But, no, we changed our directive.
5 We started making them customer directs.

6 Q. Are you familiar with disposition and cause
7 codes?

8 A. Somewhat. I wouldn't want to quote any.

9 Q. Can you give me a general idea of what a
10 disposition code is?

11 A. Yeah, a disposition would be what the trouble was
12 attributed, and cause would be what was found. Like a 900
13 would be a found okay, a 600 unknown. Something similar to
14 that.

15 Q. Those are cause codes?

16 A. 900 would be the cause code, 600 would be the --

17 Q. Disposition?

18 A. Disposition, yeah.

19 Q. Are there cause codes for weather?

20 A. Yes.

21 Q. Are there disposition codes for inside wire?

22 A. Yes.

23 Q. Are there certain disposition and cause codes
24 that would keep an out of service over 24 report from being
25 counted as a miss against the company on that PSC index?

1 A. I'm sorry, would you repeat the question?

2 Q. I would be glad to. It's a long one. We've
3 talked about the out of service over 24 hour index. The
4 requirement that reports get completed in 24 hours.

5 A. Uh-huh.

6 Q. And that's -- there is a PSC requirement that the
7 out of service reports be repaired at least 95% of the time
8 within 24 hours?

9 A. Uh-huh.

10 Q. Both of those are yes's?

11 A. Yeah.

12 Q. Now, do you know if there are certain disposition
13 and cause codes that when they're put on an out of service
14 over 24 hour report it keeps that report from being counted
15 as a miss against that PSC index?

16 A. I'm sure there are, but I don't know what they
17 are.

18 Q. Let's see if I can give you an example. For
19 instance, a hurricane would be an act of God. If a
20 hurricane sweeps through and wipes out half of the city, the
21 company obviously can't get everybody back up and working in
22 24 hours. There are going to be some out of service over 24
23 hour reports. But if it was caused by the hurricane, would
24 that be a miss against the company on those reports?

25 MR. BEATTY: If you know.

1 THE WITNESS: I don't -- I really -- I would
2 be guessing. I would assume so, but I don't know
3 for sure.

4 BY MS. RICHARDSON:

5 Q. Let me try some other weather codes, like
6 lightening.

7 A. I'm not good on codes, but go ahead.

8 Q. What about lightening. Have you ever had anyone
9 stress with you that we need to start showing some of these
10 reports to lightening codes?

11 A. Not to me.

12 Q. What about moisture code? Have you ever had
13 anyone direct you to start using the moisture code more
14 often, that it should apply more often?

15 A. Absolutely not. I haven't personally.

16 Q. Have you ever had any experience with anyone
17 using disposition and cause codes in a manner that you felt
18 was improper?

19 A. No.

20 Q. Do you know of anyone who has placed an incorrect
21 disposition or cause code on a report?

22 MR. BEATTY: I object to the form of the
23 question because it is ambiguous. By incorrect
24 do you mean incorrect or improper, or both, or
25 either.

1 MR. TYNAN: Go ahead. There's an objection.

2 THE WITNESS: I don't know.

3 BY MS. RICHARDSON:

4 Q. Now that we've got all of that out of the way,
5 I'll try one more time. Do you know of anyone who has
6 deliberately miscoded a trouble report, miscoded a
7 disposition code or a cause code on a trouble report?

8 A. No. Deliberately, no.

9 Q. Do you know of any managers who have given
10 instructions on the use of certain disposition and cause
11 codes to their STs that you felt were improper?

12 A. Not -- no.

13 Q. Are customers due a rebate if they're out of
14 service more than 24 hours?

15 A. Yeah.

16 Q. Have you always known that?

17 A. Yeah, yes. I've known it for -- since I've known
18 it.

19 Q. Do you know what the CON or the carried over no
20 code is?

21 A. I know it exists, but what it does -- if you
22 refresh my memory I'd probably know.

23 Q. Okay. Do you know if there is a code for when a
24 customer calls and says, well, I know you're going to be out
25 here today, but I won't be here. Can we please push this

1 forward to tomorrow or the next day. Is there a code to
2 take care of those kind of circumstances?

3 A. I believe so.

4 Q. Do you know what that is?

5 A. No. I didn't get involved in any coding. I
6 stayed pretty much away.

7 Q. As the manager, the assistant manager in Lake
8 Worth, besides handling repeat reports what were your other
9 duties?

10 A. I scheduled all of the maintenance
11 administrators. I was the scheduling supervisor. I had the
12 clerks, the ones from ARC and I had what they call
13 input/output. We would correct cable repairs that drop out
14 that weren't -- didn't come through. We matched data bases
15 and updated data bases. So they were mainly all clerical
16 type individuals.

17 Q. ARC, is that an administrative records clerk?

18 A. Reports clerk.

19 Q. What does an administrative reports clerk do?

20 A. They answer the phones, make out the schedules,
21 do typing, just miscellaneous type work. There was only two
22 of them for the whole building, or three of them, I believe,
23 at the time.

24 Q. Do they also work with the daily reports?

25 A. They do a lot of faxing and stuff, but whether

1 they pole reports -- but whether they know how to read them
2 or not, I'm not sure.

3 Q. In your duties of supervising the ARCs, did you
4 also handle the daily reports that came across?

5 A. I would distribute them, get them distributed to
6 the managers that were -- whoever was involved with whatever
7 report was going anywhere.

8 Q. In your duties as assistant manager, were you
9 ever involved with analysis of --

10 A. Uh-huh.

11 Q. -- reports?

12 A. (Witness nodding head.)

13 Q. That's a yes?

14 A. Yes, I'm sorry.

15 Q. And can you tell me which report, other than the
16 repeat reports were you analyzing?

17 A. Repeats.

18 Q. That's it?

19 A. Mainly repeats.

20 Q. Did you ever deal with jeopardy reports?

21 A. Sometimes, yes, I pulled jeopardy reports.

22 Q. Did you ever deal with predatory reports?

23 A. Yes.

24 Q. Did you ever deal with reports that showed the
25 total number of out of services for each IMC, the percentage

1 that the IMC was lacking at that particular point in time,
2 and how many more out of services were needed to make 95%?

3 A. Yeah. The morning report had all of that
4 information and it went over everything. The morning report
5 usually went to Carhart's office. I didn't do much looking
6 at it. But yeah, I was aware of it.

7 Q. And do you know how that particular report was
8 used?

9 A. Would you be more specific, what report you're
10 referring to.

11 Q. The morning report we just referred to that
12 showed the number of out of services the IMC had and how
13 many more out of services were needed to make 95%?

14 A. That was one of about four hundred indices in
15 there. That was one of many indices. The morning report
16 had --

17 MR. BEATTY: Listen to her question. Do you
18 know how that report was used?

19 THE WITNESS: I don't know, no. Mr. Carhart
20 usually looked at it, or one of the other
21 managers just to see how we were doing.

22 BY MS. RICHARDSON:

23 Q. Do you know of anyone who has used that
24 particular report to establish a specific number of out of
25 service reports needed and then just created fictitious

1 reports to meet that number?

2 A. Absolutely not.

3 Q. What do you do with predatory reports?

4 A. Predictory the girls used to get them in the
5 morning. That was part of the repeat report program. We'd
6 get the predatory test and we'd make up an employee report
7 and we'd put it in for dispatch, try to get a proper
8 dispatch on it. It would be a report that comes over
9 that -- again that was a known trouble and we tested it.

10 Q. You said employee reports?

11 A. Yes, I did.

12 Q. I wanted to make sure I heard that.

13 A. That is correct.

14 Q. If the customer called in afterwards, you
15 wouldn't get them on the predatory report. What kind of
16 report would it be?

17 A. It was changed to a customer direct and I lost
18 it. That's why we were always in a hurry to give them to
19 dispatch.

20 Q. How did you use jeopardy reports?

21 A. Jeopardy reports, again, was just if I know how
22 many we had on screen, how many we had pending disposition,
23 what the load was like, trying to make up force against
24 load. Just that type of thing.

25 Q. Did you ever have trouble matching force to load?

1 A. Yes.

2 Q. And when you had trouble matching force to load,
3 how did you handle it?

4 A. Well, we handled it with a lot of overtime. We
5 would do a lot of retesting and calling of customers to see
6 if something had happened in the meantime.

7 Q. Did you ever feel -- let me rephrase. Did you
8 ever receive directions from one of your managers that on
9 the surface would appear to be proper but that you
10 understood as being a direction to do something that was
11 improper in order to meet the index?

12 A. If you'd repeat that question. I'm not --

13 Q. Did any of your managers ever tell you you have
14 to meet the index?

15 A. It wasn't -- it's hard to answer with a yes or
16 no. I wouldn't say that I have to make the index, no. It
17 was a goal. It was something that we all strived for in all
18 of our indexing. We all strived for the best. But, no, I
19 don't feel that -- I missed them all the time. So no, I'm
20 still here. No, I would never say that it was a necessity
21 to meet an index.

22 Q. Is part of your annual evaluation based on your
23 meeting the company indexing on trouble reports?

24 A. Yes.

25 Q. And has your annual evaluation ever had a

1 negative notation in terms of not meeting a company index?

2 MR. TYNAN: I'd like to confer with my client
3 just for a second.

4 (Whereupon a brief discussion was held off
5 the record.)

6 THE WITNESS: I'm not sure I understand the
7 question. There's several I did miss, but I was
8 always in good standing. I mean, it held the
9 balance. Some of them I thought I could never
10 achieve and I just did the best I could. There
11 wasn't a situation -- I don't mean --

12 MR. BEATTY: Relax.

13 THE WITNESS: We had standard objectives that
14 everybody was intended to make. We did the best
15 we could to make them, but they were always
16 balanced with other objectives that balanced out.
17 So, I didn't ever feel any real pressure to make
18 any objectives. I relied on my abilities to be a
19 good manager.

20 BY MS. RICHARDSON:

21 Q. Okay. Is part of your annual evaluation or part
22 of your annual salary -- does part of that come from a bonus
23 that you get based on your meeting your objectives?

24 MR. BEATTY: I'm going to object on the
25 grounds of relevance. You can respond.

1 THE WITNESS: I'm sorry, I didn't hear what
2 you said either.

3 BY MS. RICHARDSON:

4 Q. Is part of your annual salary a bonus based on
5 your meeting company objectives?

6 A. Yes, it's pretty standard. My actual input
7 doesn't have a whole lot to do with it. I mean, it's a
8 bonus that first line managers get if they're within a
9 certain range, and I've always been within that range.

10 Q. Is that bonus in part based upon your meeting the
11 out of service over 24 hour objective?

12 A. The bonus -- I can't even tell you for sure if
13 the out of service was on mine. But truthfully it seems
14 like it was the standard on everybody's. Everybody's goals
15 was to do the best we could.

16 Q. Did you tell me that there was times when you
17 didn't meet that out of service over 24 hour objective?

18 A. Yeah.

19 Q. Was there any time when your bonus was docked
20 because you didn't meet that objective?

21 A. No.

22 Q. Are you aware of -- let me ask it this way. Did
23 you ever work with missed appointment reports?

24 A. Missed appointments?

25 Q. Yes.

1 A. I'm sure I did, yes. But I don't know too much
2 about them.

3 Q. Let me do it this way. Put the glasses on, I'm
4 going to show you something. I'm going to introduce this.
5 This is Southern Bells response to preliminary order
6 PSC-93-0263-PCO-TL entered on February 19, 1993, in the
7 consolidated rate case docket. It was filed on April 1,
8 1993. There is a Robert W. Corriveau listed at number 114.
9 If you would look at that. Is that you?

10 A. Okay. Yeah, 114, that's me.

11 Q. And there's a bunch of numbers after your name?

12 A. Uh-huh.

13 Q. Have you seen this document?

14 A. Yes.

15 Q. And I believe one of those numbers after your
16 name is number five?

17 A. Yep.

18 Q. And number five indicates that you may have some
19 information about changing commitment times generally,
20 including a PSC 222.

21 A. Yeah.

22 MR. BEATTY: There's no question pending.

23 BY MS. RICHARDSON:

24 Q. Now, what is a commitment time?

25 A. It's a time that we tell the customer we'll have

1 service restored. Or not service restored necessarily, but
2 to have their phone repaired.

3 Q. Is an appointment time different from a
4 commitment time?

5 A. Well, the --

6 MR. BEATTY: If you know.

7 THE WITNESS: The appointment time -- we give
8 appointments. Well, I guess --

9 MR. BEATTY: Do you know?

10 THE WITNESS: I don't know. I imagine it's
11 the same. I would think it would be.

12 BY MS. RICHARDSON:

13 Q. Do you know what a PSC 222 code is?

14 A. I know about it, but it's not real clear right at
15 the moment.

16 MR. TYNAN: If you don't know say you don't
17 know and leave it at that. I think you'd be
18 better off.

19 BY MS. RICHARDSON:

20 Q. Are you familiar or are you aware of a commission
21 requirement that the company keep at least 95% of all
22 appointments made with each customer each month?

23 A. I believe that to be correct, yeah. The figure
24 I'm sure is right. It sounds about right.

25 Q. Okay. When the company can't keep an

1 appointment, do you know what it's supposed to do?

2 A. Try and notify the customer that we cannot make
3 the commitment, if it's possible.

4 Q. And if the company notifies the customer that
5 they're not going to be able to keep that appointment --

6 A. Yeah.

7 Q. -- then does that count as a missed appointment
8 for the company?

9 A. I'm not sure how -- what the particular rule is
10 on that.

11 Q. On that document also appears a number six. And
12 number six says that you might have some information about
13 building the base of out of service troubles. Have you ever
14 heard of the expression building the base?

15 A. Uh-huh.

16 Q. And what does that mean?

17 A. I've only heard it by hearsay and it's from other
18 areas. That it's making up -- I guess generating reports to
19 build the base, fictitious reports.

20 Q. In order to meet that out of service over 24 hour
21 index, is that what you mean?

22 A. No, you asked what building the base was.

23 Q. Well, you said --

24 A. What the reason for it -- I would never do it and
25 I don't know of anybody that did.

1 Q. You said you've heard hearsay?

2 A. Well, through the years that was one of the
3 things that was brought up. I couldn't believe it could be
4 done, because I couldn't keep up with the ones I had. So
5 I've heard about it, but only through rumor.

6 Q. And where have you heard of it being done,
7 creating fictitious reports?

8 A. Because it's only rumor. I'd rather not make any
9 accusation.

10 Q. You've stipulated it's rumor. You've only heard
11 it and to your knowledge it may or may not have been done.
12 That's on the record, so that clarifies your answer for me.
13 Where have you heard of this being done?

14 A. I don't really know where I heard it being done,
15 but if it's not true -- okay, I heard of it in Indian River,
16 I guess, possibly. But I don't know.

17 Q. That's fine. You can clarify as much as you want
18 to clarify. That's fine.

19 A. Because I don't want to make any accusation or
20 anything if it's not true.

21 Q. Okay. By your name also appears number eleven.
22 And number eleven indicates that you might have some
23 information about improper preparation of trouble reports or
24 improper activities generally. What do you know about
25 improper preparation of trouble reports?

1 A. Improper preparation of trouble reports?

2 MR. BEATTY: If anything at all.

3 THE WITNESS: I don't have any knowledge of
4 that.

5 BY MS. RICHARDSON:

6 Q. Okay. Do you know of any managers who have
7 directed employees to prepare trouble reports in a manner
8 that you felt was improper?

9 A. No.

10 Q. Do you know of any employees who have spoken to
11 you about being given instructions to prepare trouble
12 reports in a manner that they felt was improper?

13 MR. TYNAN: Excuse me a second. You're
14 repeating your question. The man answered the
15 question that he doesn't know anything about the
16 improper preparation of trouble reports. Now
17 you're asking very specifics. That's my
18 objection. You've asked the question, he's
19 answered it. Why don't you move onto something
20 else.

21 THE WITNESS: I really don't know.

22 MR. TYNAN: I mean, you have him guessing. I
23 suggest to you that if you don't know the answer
24 to something say you don't know. Don't guess at
25 something. If you know something, give them the

1 proper answer.

2 BY MS. RICHARDSON:

3 Q. Also included on the other half of that was
4 improper activities generally. Do you know anything about
5 improper activities?

6 A. No. That's awful general. I don't know what
7 you're referring to. I really don't.

8 Q. Okay. By your name is number twelve. And that
9 indicates something about statusing troubles generally,
10 including criteria for statusing out of service. Can you
11 tell me what the criteria is for determining -- how do you
12 decide if a report is out of service?

13 A. By the test and by what the customer reports.

14 Q. What does the customer have to report?

15 A. There's two other criteria.

16 Q. What does the customer have to report?

17 A. No dial tone, can't be called.

18 Q. When you say test, what do you mean by test?

19 A. The test results that would come over at the time
20 the customer reported the problem.

21 Q. Was this some kind of --

22 A. MLT, mechanized lube testing. Looks at the line
23 and snap pictures of that line at that specific time and
24 gives an indication of what the possible trouble might be.
25 Certain indications -- and I can't specify -- I wouldn't --

1 I'd be guessing.

2 Q. Do you know of any occasions where managers have
3 directed their employees to improperly status out of service
4 reports as out of service?

5 A. Would you repeat the question?

6 Q. Let me try a different way.

7 A. Please.

8 Q. Have you ever heard of a manager telling his
9 people just don't status any out of services today?

10 A. No.

11 Q. Have you ever heard of a manager telling
12 employees to take affecting service reports and status them
13 as out of service?

14 A. No.

15 Q. Have you ever heard a manager tell employees to
16 status out of service reports outside the boundaries of the
17 criteria that you gave me for the test and the customer
18 reporting?

19 A. Can I answer that with some kind of --

20 MR. TYNAN: If you can answer it fine, if you
21 can't --

22 THE WITNESS: It's not a yes or no.

23 BY MS. RICHARDSON:

24 Q. Just whatever you want to say to it. It doesn't
25 matter. There's no right or wrong answer necessarily. It's

1 whatever you know.

2 A. Just reword the question, because I don't -- you
3 know, I was in there a long time. A lot of things happened.
4 Things changed as they come through. I'm not saying we
5 never did anything wrong. If we found out we were doing
6 something wrong we'd always correct it. The only intent we
7 ever had is for the service of the company. And one of main
8 things was the customer. But the main idea of the out of
9 service -- because it helps us with our strategy and
10 dispatch. Those are the ones we try to take care of first.
11 So criteria, it changed in the nine years I was in the
12 maintenance center. It changed one hundred different ways.
13 It was always resolving and changing and getting better and
14 better and better.

15 Q. Okay. I want to --

16 A. I don't understand your question. I don't want
17 to lead you down the wrong path. I don't want to tell you
18 anything that's not clear in my own mind either. If you
19 restate the question one more time.

20 Q. Okay, let's see if we can separate some of this
21 out then. Apart from the intention that you're expressing
22 to give good customer service and the eagerness that you've
23 expressed in making sure that the customer gets the best
24 quality of service possible --

25 A. Uh-huh.

1 Q. -- and perhaps in that interest --

2 A. Go ahead.

3 Q. -- was there anything that was done that later
4 turned out to be improper in terms of statusing out of
5 service reports?

6 MR. BEATTY: Other than what he may have
7 already mentioned, if anything.

8 THE WITNESS: I'm sure we made mistakes. And
9 that is not a cop out. But I'd say, yeah, it's
10 very -- yeah, I'm sure we have.

11 BY MS. RICHARDSON:

12 Q. When does a trouble get statused out of service
13 or not out of service; when is that determination made?

14 A. At the present time?

15 Q. Okay.

16 A. I believe it's statused right up front whether
17 it's out of service or not.

18 Q. All right. And is that a decision that's made by
19 a maintenance administrator?

20 A. I'm not sure how it works right now. I really am
21 not. I think there are certain criteria. I don't know. I
22 don't know.

23 Q. When you were a manager, and you were working in
24 the maintenance center, do you know when a report was
25 statused -- at what point in the process it got statused out

1 of service?

2 A. Through the years it changed constantly the way
3 it was done.

4 Q. Do you know of any occasions where reports were
5 not statused until close out?

6 A. Yes.

7 Q. Was that done on a consistent basis for all
8 reports?

9 A. Now, you're going back a long time. But, I mean,
10 way back it was -- if I remember correctly that was the way
11 we did business at one time for a short time, and that's all
12 the information I can give you. How long and all of that
13 I'm not sure.

14 Q. Was this before Lake Worth, then, when you say we
15 go way back, or was this in Lake Worth?

16 A. I've been in the maintenance center for nine
17 year, ten years. It's back to when we were at Military
18 Trail and Hypoluxo. I've been with this maintenance center
19 a long time.

20 Q. Were you in Hypoluxo also?

21 A. Yeah.

22 Q. Did you deal with statusing when you were in
23 Jupiter working with the outside crew?

24 A. In what respect?

25 Q. Statusing out of service reports?

1 A. I still don't understand the question.

2 Q. When you were an outside crewman --

3 A. With my crew?

4 Q. When your crew was out there working on residents
5 and business, and you said they worked with installation and
6 repair, was part of your duties to supervise how your crew
7 statused trouble reports?

8 A. Yes.

9 Q. During that period of time do you recall whether
10 or not the reports were statused up front or at the end?

11 A. Up front.

12 Q. Were they statused before your crew got there?

13 A. Uh-huh.

14 Q. Did your crew ever have occasion to change the
15 status once they received reports?

16 A. They have, yeah.

17 Q. Would they ever change an out of service to an
18 affecting service report?

19 MR. BEATTY: If you know.

20 THE WITNESS: I don't know of any instance.

21 BY MS. RICHARDSON:

22 Q. Would they ever have occasion to take an
23 affecting service report and change it to out of service?

24 MR. BEATTY: If you know.

25 THE WITNESS: I don't know of any instances.

1 BY MS. RICHARDSON:

2 Q. Do you know of anyone who has had a procedure of
3 holding out of services in an affecting service status until
4 close out in order to determine the status based upon
5 whether they were cleared under 24 or cleared over 24?

6 A. No.

7 Q. By your name also appears number seventeen,
8 intimidation or pressure. What information can you tell me
9 about intimidation or pressure on the job from managers?

10 MR. BEATTY: I object to the form of the
11 question. It is truly ambiguous. If you
12 understand that question and you can formulate a
13 response, then please feel free to do so.

14 THE WITNESS: Can you rephrase just to make
15 sure I do understand what you're trying to tell
16 me. An intimidation by who; who's doing the --

17 BY MS. RICHARDSON:

18 Q. Intimidation?

19 A. Yeah, intimidation.

20 Q. Intimidation or pressure by other managers or
21 their employees that you may have witnessed?

22 A. Of their employees, no.

23 Q. What about intimidation or pressure from your
24 managers to you?

25 A. No.

1 Q. You never --

2 A. I put my own pressure on myself. I always want
3 to do the best. I respect everybody I work for and I
4 never -- I always give them a good day. I don't feel
5 intimidated.

6 Q. Do you know what a no access code is?

7 A. The codes itself?

8 Q. Not the number, but do you know what it's used
9 for?

10 A. (Witness nodding head.)

11 Q. What is the no access used for?

12 A. When we can't gain access to the customer's
13 premises, a meter room or some place where we need to do a
14 job function to get in to clear a trouble.

15 Q. Do you know of anyone who has no accessed a
16 report before it was dispatched?

17 A. No.

18 Q. Do you know of anyone who no accessed a report
19 when they actually had access?

20 A. No.

21 Q. Do you know whether or not that no access stops
22 that 24 hour repair clock?

23 A. No. I think it does, but --

24 Q. You think it does but you're not sure?

25 A. I don't pay attention to that stuff. I think it

1 does stop it, but I don't know for sure.

2 Q. Do you know of anything that does stop that 24
3 hour repair clock?

4 A. Right now I don't think anything does.

5 Q. In the past was there anything that could stop
6 that 24 hour repair clock?

7 A. Yeah. Repeat the question again. What stops the
8 out of service --

9 Q. Repair clock?

10 A. Repair clock. I believe the no access does.

11 MR. BEATTY: If you know.

12 THE WITNESS: I do know, but I can't bring it
13 to mind right now. I don't know if it's I'm
14 nervous or what. I'm going blank here.

15 BY MS. RICHARDSON:

16 Q. Do you know of any managers that have required
17 their MAs to call them or get permission from them to close
18 out reports, out of service reports that were about to go
19 out over 24?

20 A. I have no direct knowledge of it. I've heard
21 that.

22 Q. Heard that here in Lake Worth?

23 A. Yeah.

24 Q. About managers here in Lake Worth or --

25 A. Yeah, I believe so.

1 Q. Do you know why the managers were having their
2 MAs come to them for permission?

3 A. There were a few that weren't paying attention to
4 what they were doing and they were just trying to -- from
5 what I heard just trying to keep them aware of what they
6 were doing. It's a busy place to work and people get
7 carried away and do things. And it was just a safeguard, I
8 would imagine. It was not -- I don't think there was any
9 intent, but a safeguard to keep -- some people just didn't
10 pay attention to what they were doing.

11 Q. Do you know of anyone who has taken an out of
12 service report that's about to go out over 24 hours and
13 closed it out and then opened it as an EO report?

14 A. No.

15 Q. Do you know what a Test-OK report is?

16 A. Test-OK?

17 Q. Yes. What's a Test-OK okay report?

18 A. It's a report that tests okay. There's no
19 trouble condition on the line that warrants the report
20 really.

21 Q. Do you know of anyone who has taken a bunch of
22 Test-OK reports and closed them out as out of service?

23 A. No.

24 Q. Do you know of anyone who has taken a bunch of
25 affecting reports and closed them out as out of service?

1 A. No.

2 Q. Do you know anybody who's used someone else's
3 employee code?

4 A. Can I answer -- I don't know who, but there was a
5 number that would pop up that didn't exist to anybody on
6 occasion.

7 Q. Okay. And where would this number pop up?

8 A. I'd be reading reports and it would be closed
9 out. And there would be a number that didn't belong to
10 anybody. 999 or something that was not a -- they called
11 them the phantom. Every once in a while a report would come
12 up like that.

13 Q. And that's when you were --

14 A. I had no idea who was doing it.

15 Q. Was this when you were an assistant manager in
16 Lake Worth?

17 A. Uh-huh.

18 Q. During that period of time did you report this to
19 anybody that you had this phantom number?

20 A. We had discussions on it, I believe. I don't
21 remember exactly what happened. It seemed to me there was a
22 letter put out trying to get it resolved. Whoever was doing
23 it stop immediately. I don't remember the full impact, but
24 I do remember and I did discuss it -- I imagine it might
25 have been with Tom.

1 Q. Mr. Crampton?

2 A. Yeah.

3 Q. Did Mr. Crampton put the letter out?

4 A. I believe -- I don't remember exactly. Yeah,
5 there was a number, it was discussed, and it was rectified,
6 I'm sure, after a period.

7 Q. Was there any problem with these reports other
8 than the 999 code?

9 A. There was usually no information with it. It was
10 usually just an exclude 999, so it's hard to track.

11 Q. So these reports were excluded reports?

12 A. I would think most of them were an exclude
13 report.

14 Q. And what's an exclude report?

15 A. It's a report that is excluded from the data
16 base.

17 Q. How do you do that? How do you exclude a report?

18 A. I don't know what the exact procedure is. I
19 didn't use the terminal that much. There was a way you
20 could go in and you could exit out and it would just -- in a
21 certain spot and the report would just --

22 Q. Get excluded from the data base?

23 A. Get excluded from the data base.

24 Q. Do you know whether these were out of service
25 reports that had been excluded?

1 A. I don't know. See, if I remember correctly it
2 didn't leave a history. I don't know. That may be
3 corrected by now. I don't know.

4 Q. Did you discuss this with anyone other than
5 Mr. Crampton?

6 A. Yes. I probably discussed it with my MAs. Tell
7 them it was not to continue.

8 Q. So you did some investigation on your own?

9 A. I just seen it pop up is all.

10 Q. Do you know of anyone who has put false
11 information on a customer record?

12 A. No.

13 Q. Have you ever been formally disciplined for your
14 handling of customer trouble reports?

15 A. No.

16 Q. Have you ever been formally disciplined for your
17 managing of employees who handle customer repair and
18 service?

19 A. No.

20 Q. Have you ever been informally disciplined for
21 your working with customer repair and service?

22 A. No.

23 Q. Have you ever had occasion to discipline one of
24 your employees for mishandling customer reports?

25 MR. BEATTY: Intentionally mishandling or

1 mistakenly handling?

2 MS. RICHARDSON: I'd rather not add that to
3 it.

4 MR. BEATTY: I object to the question on the
5 grounds of relevance. You may respond, if you
6 can.

7 THE WITNESS: I would -- in clear conscious
8 right now I'd say no. But I don't know of any
9 situation where I have done that. I wouldn't say
10 absolutely.

11 BY MS. RICHARDSON:

12 Q. Do you know of any managers who have stated
13 trouble reports themselves; just gone to the computer screen
14 and stated or worked on trouble reports?

15 A. Sure.

16 Q. Is that a job that managers would normally do?

17 A. Sure. I didn't do it because I wasn't very good,
18 but, yeah, sure.

19 Q. Do you know of any managers who consistently
20 cleared and closed trouble reports?

21 MR. BEATTY: Object to the form of the
22 question. It's ambiguous. You can respond to
23 that, if you can.

24 THE WITNESS: I don't really know.

25 MR. TYNAN: If you know you can answer the

1 question, if you don't know --

2 THE WITNESS: Just restate the question,
3 because I do know -- well, restate the question
4 to make sure I'm right.

5 BY MS. RICHARDSON:

6 Q. That's fine. Do you know of any managers who on
7 a consistent basis through a period of time just went ahead
8 and cleared and closed trouble reports instead of letting
9 the MA do it; the managers just consistently cleared and
10 closed trouble report?

11 MR. BEATTY: Same objection. You have to
12 define consistently.

13 THE WITNESS: I know of managers who have,
14 because of work load or something of that nature,
15 sat down and done statusing to help catch up,
16 yes. But as a consistent -- you'd have to define
17 consistent for me. No, not to sit there and not
18 have anything else to do.

19 BY MS. RICHARDSON:

20 Q. Do you know of any managers who have cleared and
21 closed trouble reports from their own computers?

22 A. No.

23 Q. Do you know of any --

24 A. I don't think it can be done.

25 Q. Do you know of any grievances that have been

1 filed by craft against managers for doing MA type work?

2 A. Again, I recall one, but I couldn't give you any
3 specifics on it. I think there was one at one time, yeah.
4 But I can't give you any specifics on it. I wasn't involved
5 in any way.

6 Q. Can you give me a general time period?

7 A. Oh, gee.

8 Q. Early 80's, mid 80's?

9 A. I'm sorry, I couldn't do that. I know I
10 couldn't. I'm just no good at dates at all. To separate
11 what happened and when is very difficult. And I would hate
12 to even -- it would be strictly -- I can't even guess.

13 Q. Have you ever been asked to help sell products or
14 services for the company?

15 A. In my whole career or just --

16 Q. Yes?

17 A. We were all in marketing.

18 Q. Do you still help sell products and services for
19 the company?

20 A. No.

21 Q. When did you stop selling?

22 A. Well, I didn't really do any selling. It was --
23 we were all to make a sales effort. When we were on a job
24 with people out in the field, we would sell features. And
25 it was just part of just doing good business. If we were

1 there, would you like touch tone added to your phone. We
2 can put it on. We had little incentives for the customers.
3 Saying that we could get it put on maybe for no charge, or
4 something like that. They'd have certain timeframes that
5 you'd get certain features added or whatever to encourage --
6 it was always -- from day one I used to sell touch tone sets
7 when I was out. It was good business to sell your product.
8 So, yes, I would.

9 Q. Did you ever supervise maintenance administrators
10 in sales work?

11 A. No.

12 Q. Did any of the maintenance administrators that
13 you supervised volunteer to help with sales programs?

14 A. No, not under my direction.

15 Q. Have you ever heard of a boiler room?

16 A. Uh-huh.

17 Q. And do you know if a boiler room was set up here
18 in the Palm Beach area?

19 A. Uh-huh. I believe there was.

20 Q. And who set the boiler room up?

21 A. It was done by Mr. Olson's group.

22 Q. Did you have any of your employees go to the
23 boiler room to help sell?

24 A. No.

25 MR. GREER: Could you say that name again.

1 The door opened right about the time --

2 BY MS. RICHARDSON:

3 Q. Mr. Olson's group, is what you said. Is that
4 Butch Olson?

5 A. Yeah, Butch.

6 Q. Do you know of any employees who recorded sales
7 to a customer that the customer did not approve?

8 A. I know all you know about it is through
9 publicity. I didn't know it was happening at the time.

10 Q. Did you yourself ever win any prizes or awards
11 for your sales efforts?

12 A. No -- wait a minute. I didn't directly win any.
13 I had received a piece of luggage one time and the points
14 were put against my name. I didn't make the sales.

15 Q. Why were the points put against your name then?

16 A. I don't know.

17 Q. Was it because you were a manager?

18 A. I have no idea. I guess when I questioned it it
19 was because the people that were off the load doing the
20 sales, working the boiler room, making the contacts, it
21 wasn't fair for them because that was their job to sit there
22 and sell and receive prizes. So the points were distributed
23 among other employees so that not all one person -- because
24 we were carrying the load, the way it was explained to me.
25 I don't know even know who explained it to me. It might

1 have been it was only fair to split up the prizes, because
2 we were doing a job while they were off the load doing
3 sales.

4 Q. Okay. Do you know why they were off the load
5 doing sales how they recorded their time?

6 A. No, I believe most of them were accident light
7 duty people. I believe -- I wasn't involved in that at
8 all. I think most of them were light duty. People that
9 hurt themselves and couldn't use them on the load.

10 Q. Do you know if they were recording their work
11 time under maintenance responsibilities or under sales reps?

12 A. I have no idea how they were recording their
13 time.

14 Q. Have you ever been beformed?

15 A. No. Yeah, when I was a craft person I was sent
16 home for not shaving.

17 Q. Okay, I'm going to show you a document. I'd like
18 to know if you've ever seen this document.

19 A. I think this is the one that they -- first time I
20 seen it was when I was sent to the work center to find out
21 if anybody had these on their truck.

22 Q. And why were you sent to the work center to find
23 out if anybody had it on their truck?

24 A. Because this is piece of material that had come
25 up and they wanted to find out -- what was explained to me

1 is, they wanted to see how many of these were in the field.

2 Q. Okay. And what happened to these documents when
3 they were found?

4 A. They were turned over to a staff person. That
5 was the guys came in, if they were found on their trucks
6 they were turned over to a staff person that was there
7 waiting for them.

8 Q. And were these guys given any further
9 instructions about using or not using these particular
10 forms?

11 A. No. I hadn't seen them before and most of them
12 were just sitting on the trucks and filed in a bin
13 somewhere.

14 Q. Do you know how many there were?

15 A. No.

16 Q. Do you know who went out and picked these up? Do
17 you know who went up and actually picked these up from the
18 guys?

19 A. I'm trying to remember his name. The guy that
20 was --

21 MR. BEATTY: I'm going to object on the
22 grounds of relevance. You can respond to that,
23 if you can. If you know you can respond.

24 THE WITNESS: I think the guy that picked
25 them up --

1 MR. BEATTY: That's what she's asking.

2 MR. TYNAN: If you know.

3 THE WITNESS: I know his name, but again -- I
4 know him, but the name has escaped me for a
5 minute. But it was a staff person. I know him
6 real well.

7 BY MS. RICHARDSON:

8 Q. Bob Fecht?

9 A. No, but he works with Bob. God, I can't
10 remember. His name just dropped out of my mind. I know who
11 it is. I've had lunch with him, as a matter of be fact.

12 Q. I'm going to show you a another document.

13 MR. BEATTY: I'm going to object to this line
14 of questioning. This is a continuation of the
15 very same document that you've just shown. This
16 gentlemen has testified already with respect to
17 every aspect of this document that he knows
18 about. I object to any continuation of this line
19 of questioning. I think this is -- at this
20 point, this is harassing this witness. I think
21 it's improper. For the record, just to identify
22 this document, it's entitled closing repair jobs.
23 It's a two page document. Pages are numbered one
24 and two. Three numbered paragraphs on the first
25 page with CAT screen depiction thereafter.

1 MS. RICHARDSON: Okay. I have not
2 established that it was part of the first
3 document that he was shown.

4 MR. BEATTY: Well, you know it is and so
5 do I.

6 MR. TYNAN: I'd like to see the first
7 document you showed him again.

8 (Whereupon a brief discussion was held off
9 the record.)

10 MR. BEATTY: We're ready to go back on the
11 record.

12 MS. RICHARDSON: Are you ready? I'm sorry, I
13 was waiting for you. I wasn't watching you.

14 MR. TYNAN: Yes.

15 BY MS. RICHARDSON:

16 Q. We have an objection on the record that's been
17 placed on the record by Southern Bells counsel. I'd like to
18 know have you ever seen these two pages?

19 MR. BEATTY: I object on the grounds that
20 I've indicated. This is repetitious. It is
21 nothing more than harassing this witness on this
22 particular topic. He's testified fully to every
23 single one of your questions with respect to his
24 involvement or lack there of with respect to this
25 document collectively. To ask him more questions

1 on this is improper.

2 BY MS. RICHARDSON:

3 Q. Mr. Corriveau, we have the objection stated on
4 the record. Now, have you ever seen these two pages?

5 A. If this is part of the package that you just
6 showed me. I have not looked at it or read it, okay, but if
7 it's part of that package then I only know it as being part
8 of that package.

9 Q. Okay.

10 A. I want to clarify that, because -- wait a minute,
11 I think I did read it.

12 MR. BEATTY: Go ahead.

13 THE WITNESS: I think I did read it. If this
14 is the one that we discussed, then I did read it
15 and went over it, briefed it. So, if it's the
16 same one, I did look at it but I don't -- I did
17 read it.

18 BY MS. RICHARDSON:

19 Q. Okay. Can you tell me when you read it?

20 A. Oh, about a few days -- I can't give you a date.

21 Q. You mean a few days past from today?

22 A. No, it was prior to when we were looking for
23 these on the trucks.

24 Q. And who brought it to your attention?

25 A. They just paged me and told me to be in the

1 maintenance center. They wanted to see how many of these
2 they could find. And that was part of a pack.

3 Q. And what was the discussion about this book that
4 you had?

5 MR. BEATTY: Objection. The question has
6 been asked and answered. This gentlemen has
7 testified with respect to every aspect of this
8 and in reference to your prior series of
9 questions with regard to the previous document.
10 Again, you are harassing this witness on this
11 topic and I object.

12 MR. TYNAN: Off the record.

13 (Whereupon a brief discussion was held off
14 the record.)

15 THE WITNESS: I'm not sure, but yeah, I
16 believe I've seen this before.

17 BY MS. RICHARDSON:

18 Q. Okay. And when this was discussed, what was the
19 discussion?

20 A. We talked about the close outs and if there was
21 any -- let me look at it again. I'm trying to remember
22 exactly.

23 MR. BEATTY: Sir, she's not asking you to
24 read that.

25 MS. RICHARDSON: Let's go off the record.

1 (Whereupon a brief discussion was held off
2 the record.)

3 THE WITNESS: We discussed whether that would
4 be detrimental looking at that -- if it looked
5 like it was detrimental, that we were doing
6 something wrong.

7 BY MS. RICHARDSON:

8 Q. And what was your opinion?

9 A. My opinion from reading that by itself was it
10 could be misconstrued as yeah, maybe we were. But after
11 reanalyzing it, I decided that no, it's probably what we
12 were doing, just backing up. It could be -- an outsider
13 looking at it could misconstrue this as a problem.

14 Q. Back up what?

15 A. An out of service.

16 Q. You mean back up the time?

17 A. The time, right.

18 Q. This is going to be Exhibit 1 to this particular
19 deposition. And was it pulled for that reason that it might
20 be misconstrued by other people --

21 MR. BEATTY: I object --

22 THE WITNESS: I don't know the reason why it
23 was pulled.

24 MR. BEATTY: Listen to me when I object. I
25 object on the grounds that this line of

1 questioning violates the best evidence rule.
2 This document is the best evidence with respect
3 to what the document says. What this witness has
4 done is looked at that document, and this witness
5 also is, as you know, counselor, not the
6 originator of this document and only came into
7 contact with this document during a collection
8 process. For you to inquire of him as to what
9 this document means or what this documents says
10 is for to you do nothing more than to ask him at
11 this point to read it, to review it, and to offer
12 an opinion about it. It's improper. The
13 documents speaks for itself and I object.

14 MS. RICHARDSON: I asked him about the
15 discussion about the document, which he was
16 present.

17 MR. BEATTY: Now you're asking him about his
18 opinion.

19 MS. RICHARDSON: That he formed during the --

20 MR. BEATTY: No, you asked him about his
21 opinion with respect to after he had the
22 document. What was his interpretation of the
23 document, and why -- what was the purpose for his
24 checking the document. It is to that issue I
25 base my objection. I suggest that it is improper

1 because the document itself is the best evidence
2 of what that document stands for, not this
3 gentleman's interpretation of it to the extent
4 that he is not the originator of it or had no
5 participation at all in the creation of it.

6 BY MS. RICHARDSON:

7 Q. In terms of discussions that you were present,
8 where you were present, did you form an opinion during those
9 discussions as to why this document was being pulled off the
10 trucks?

11 MR. BEATTY: Objection, relevance. You can
12 respond to that, if you can. If you know.

13 THE WITNESS: It's just an opinion, so --

14 BY MS. RICHARDSON:

15 Q. That's fine. That's what I'd like to have is
16 just your opinion.

17 A. All I did is say that I thought that it could be
18 misconstrued, and I didn't feel that that was the way --
19 there was no intent there, but it could be -- somebody could
20 look at it and not know the business and feel that we were
21 doing something.

22 Q. Okay. When you say feel we were doing something,
23 you mean improperly backing up the time?

24 MR. BEATTY: Objection, you're leading the
25 witness, counselor.

1 BY MS. RICHARDSON:

2 Q. When you say not doing something properly, what
3 do you mean by something?

4 A. At the time it might have been backed up.

5 Q. On trouble reports?

6 A. Right.

7 Q. Do you know when this discussion occurred?

8 A. The date, no.

9 Q. Do you know an approximate month or year?

10 A. Probably a few months ago, I guess.

11 Q. '93 then, 1993?

12 A. I don't know the date. I can't put dates
13 together. I'm sorry. I just -- I have a hard time
14 putting -- dates are very poor in my mind. I know it was
15 fairly recent.

16 Q. When you worked outside doing trouble repair, did
17 you ever work with the CAT terminal?

18 A. No. I still have never worked with the CAT
19 terminal. I don't know much about them.

20 Q. Did you ever attended a training class on the use
21 of a CAT terminal?

22 A. I've seen scripts, but I don't believe -- when
23 they first came out. I wouldn't calling it training, but
24 for an introductory type thing. But I've never used a CAT
25 ever in my life, and I've only seen scripts come down. So

1 I'm not familiar at all with it.

2 Q. Do you know which crews had this Exhibit 1 on
3 their trucks?

4 A. Yeah. Well, I know mine did.

5 Q. Your crew did?

6 A. Uh-huh. Not -- before my time, though. I mean,
7 I didn't know they had them there.

8 Q. Did you know how they got them, your crew?

9 A. The crew that I had in Royal Palm Beach. I now
10 have a crew in Royal Palm Beach.

11 Q. Okay. I have that you have an outside screw in
12 Jupiter and that you worked inside.

13 A. Then I came inside, then I went back outside.

14 Q. Missed that all together. When were you outside
15 again?

16 A. I thought I said I went out in March about two
17 and a half years ago.

18 Q. Oh, field control manager. So, just presently --
19 the crew that you presently supervise these were on their
20 trucks?

21 A. Uh-huh.

22 Q. Okay. Then how did your crew get these on their
23 trucks without you knowing?

24 MR. BEATTY: If you know. Do you know?

25 THE WITNESS: No, I would just be guessing.

1 They weren't given to me, they were before my
2 time.

3 BY MS. RICHARDSON:

4 Q. So, your crew had them on their trucks before you
5 became their manager?

6 A. Yes. When I was transferred there were some that
7 had them on their trucks.

8 Q. Do you know of any other crews than yours that
9 had these on their trucks?

10 A. I stated I didn't know how many were found but
11 I'm sure -- because I didn't have all of them. I'm sure
12 there was -- this crew used to work under another
13 supervisor, another second level group.

14 Q. Who was their supervisor before you then?

15 A. Charlie Pagan.

16 Q. P-a-g-a-n?

17 A. Uh-huh.

18 Q. Did you ever ask any of your crew how they got
19 these books?

20 A. Yeah, after they got them they said they didn't
21 remember, they were handed out by Charlie one day.
22 Information book on how to -- a lot of good information on
23 how to shoot troubles. It was an information book that was
24 compiled and passed out, I believe, under -- I'm assuming
25 under another second level group that they reported to at

1 the time.

2 Q. Do you know --

3 A. They just hang onto their stuff. I don't even
4 think they used them. They all had to look for them. They
5 have a bin they carry books in.

6 Q. Do you know who wrote this book?

7 A. I heard after the fact that Mike Doudee wrote it.

8 Q. Do you know if Mike Doudee trained anybody in
9 using this book?

10 A. No, I don't.

11 Q. Do you know if any of the crews that Mike worked
12 with use this book?

13 A. No, I don't.

14 Q. Do you know if he trained any of the crews that
15 you assumed control of?

16 A. Trained? No, I don't.

17 Q. Let me put it this way, then. Do you know of any
18 crews in this area that didn't have that book?

19 A. That didn't have the book?

20 Q. Yes.

21 MR. TYNAN: I object to the question. It's
22 very broad. I don't know what you mean by this
23 area. Be a little more specific.

24 BY MS. RICHARDSON:

25 Q. Do you know of any crews in the Palm Beach area

1 that did not have this book?

2 MR. TYNAN: That's very definitive. I don't
3 know what you mean by the Palm beach area. I
4 think we have to know. There's a lot of places
5 around here called Palm Beach, North Palm Beach,
6 also Palm Beach Gardens.

7 BY MS. RICHARDSON:

8 Q. Define Palm Beach area for me, then, in terms of
9 what Southern Bell uses as an area, parameter?

10 A. Existing Palm Beach?

11 Q. Yes.

12 A. That would be from Boynton to -- up to just this
13 side of Jupiter. We used to have Jupiter.

14 Q. Do you know how many crews function in that
15 particular area?

16 A. Exact amounts I don't know.

17 Q. You don't know?

18 A. I believe we have five or six under Mr. Driggers
19 and five under Tom Crampton. So that would be approximately
20 eleven, give or take one, I guess.

21 Q. Okay. Do you know any of those crews that you're
22 aware of -- did any of those crews not have this book on
23 their truck?

24 MR. TYNAN: I think you're not laying a very
25 fair predicate for him. Ask him if he knows

1 everyone of those crews?

2 THE WITNESS: See, they --

3 MR. TYNAN: If he knows what they have on
4 their equipment. I think you're sandbagging my
5 client. I don't really think you intend to, but
6 that's the input of it. I would prefer that not
7 be done.

8 MS. RICHARDSON: Okay.

9 MR. TYNAN: Let me take this one step
10 further. I'm very pleasant and I've been very
11 pleasant here. But if you ask my client
12 questions that I feel are unfair, I will not do
13 what counsel for Public Service Commission does.
14 I don't work for Southern Bell. I'm one of these
15 independents. I'll instruct him not to answer
16 the question and you can drag us both in front of
17 the court. I want you to be fair to him.
18 That's all I ask in your questioning, please.

19 BY MS. RICHARDSON:

20 Q. Okay. All right, let's try it this way. Do you
21 know how many of the eleven crews that you know of -- how
22 many of them had the books?

23 A. I would be guessing. I don't know. I know it's
24 not all of them.

25 Q. So, to your knowledge --

1 A. To my knowledge they were distributed
2 under one second level group, and in the meantime all
3 people have changed positions, moved within and --
4 I've had a big turnover in my group alone. They move
5 around.

6 Q. And what one second level group were they
7 distributed in originally?

8 A. Under Mr. Olsons.

9 Q. Mr. Olson's group. Okay. And the only reason
10 then that you said they may have appeared in your group or
11 somebody else's was because those individual employees were
12 shifted from one group to another?

13 MR. BEATTY: I object to the form of the
14 question. This man has testified to that fact
15 for the past fifteen minutes. I object. And
16 again, I suggest to you that this is a harassing
17 process with respect to this witness. We've been
18 over this testimony over and over and over. And
19 I respectfully request that you move forward in
20 your questioning.

21 MS. RICHARDSON: Mr. Corriveau, I'm through.
22 I have no further questions. I appreciate your
23 being here today. Thank you very much. The
24 Public Service Commission staff might have one or
25 two.

1 MR. GREER: No.

2 CROSS EXAMINATION

3 BY MR. TYNAN:

4 Q. I'd like to ask you a question as a point of
5 clarification. In response to many of the questions that
6 were given -- that were asked of you by counsel, your
7 answers started out with I imagine. Specifically you had
8 been asked a question with respect to Mr. Crampton and you
9 said I imagine a letter was sent out. Do you know if in
10 fact a letter was sent out?

11 A. No.

12 Q. All right. So when you use the term I imagine,
13 you were guessing at answers, weren't you?

14 A. Yeah.

15 MR. TYNAN: That's all I have. Thank you.

16 (Whereupon the deposition was concluded at
17 4:51 p.m.)

1 CERTIFICATE

2

3 STATE OF FLORIDA)

4 COUNTY OF PALM BEACH)

5

6 I, Kimberly C. Ayers, Court Reporter and Notary

7 Public, State of Florida at Large, do hereby certify that I

8 reported the deposition of ROBERT CORRIVEAU

9 stenographically, and that the foregoing transcript is of a

10 true and correct transcript of my shorthand notes.

11 I further certify that the deposition was taken at

12 the time, place shown hereon, and that all counsel, persons

13 as hereinabove shown were present.

14 I further certify that I am not an attorney,

15 counsel, relative or employed by either party or attorney.

16 The foregoing certification of this transcript does

17 not apply to any reproduction of the same by any means

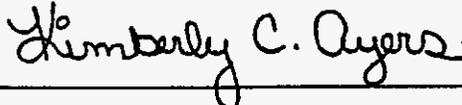
18 unless under the direct control and/or direction of the

19 certifying reporter.

20 WITNESS MY HAND AND SEAL THIS 29TH day of June,

21 1993, at West Palm Beach, County of Palm Beach, State of

22 Florida.

23 

24 KIMBERLY C. AYERS, Court Reporter

25

CLOSING REPAIR JOBS

CORRECT FORMAT FOR BACKING UP YOUR TIME ON REPAIR JOBS

1. WHEN YOU FIRST RECEIVE A TROUBLE REPORT IN YOUR CAT, THE DATE RECEIVED WILL APPEAR ON PAGE 6 OF THE CUSTOMER MENU. THE DATE RECEIVED WILL ALSO APPEAR ON YOUR CAT WHEN YOU CLOSE THE JOB ON THE CLOSED TTN SCREEN. THIS IS THE TIME YOU WANT TO WATCH FOR THE 24 HOUR COMMITMENT.
2. THE DUE DATE AND TIME WILL ONLY APPEAR WHEN YOU FIRST RECEIVE THE TROUBLE IN YOUR CAT ON PAGE 7 OF THE TROUBLE MENU. IT DOES NOT APPEAR WHEN YOU CLOSEOUT THE TROUBLE. YOU WILL NEED TO KEEP A MENTAL NOTE OF THE DUE DATE AND TIME SO THAT WHEN YOU CLOSEOUT YOUR TROUBLE YOU CAN BACKUP YOUR TIME TO MEET THE COMMITMENT.
3. IF YOU ARE CLOSING A REPAIR JOB AND YOU ARE AT OR HAVE EXCEEDED THE DUE DATE AND TIME OR THE 24 HOUR COMMITMENT TIME YOU MUST GO TO ANOTHER LINE, NOT THE ONE YOU WILL BE CLOSING IN ORDER TO CLOSEOUT THE JOB. IF YOU CLOSEOUT THE JOB FROM THE LINE YOU JUST REPAIRED, LMOS WILL NOT RECOGNIZE THE TIME YOU BACKED UP TO MEET THE 24 HOUR COMMITMENT. IN ORDER TO MEET THE 24 HOUR COMMITMENT, YOU WILL NEED TO CLOSEOUT FROM A DIFFERENT WORKING LINE. IF YOU ARE NOT IN JEOPARDY OF MISSING THE 24 HOUR COMMITMENT, YOU CAN CLOSEOUT FROM YOUR JOB.

receive new job
work on current job

- * CLOSE JOB
- other

- CLOSE JOB
- close job-off duty
- return but don't
- close the job

- * CLOSE OR RETURN JOB
- test ok
- return to cable
- return to co

- this trouble was:
- CLEARED
 - not cleared

request in progress

- cleared:
- CUSTOMER ADVISED
 - customer not
 - advised

close ttn is:
0328076
CUSTOMER REPT TIME:
06-07-88 1100A

READY TO TEST: MAKE
LINE NORMAL. DROP
OFF AFTER NEXT IF
YOU ARE ON THE LINE.

REMEMBER TO GO TO ANOTHER
LINE IF YOU ARE NEAR, AT,
OR HAVE EXCEEDED THE 24
HOUR COMMITMENT.

Deposition

Public Court Exhibit

No. 1 For I.D.

Depo of R. Carrison

request in progress

THE TIME SHOULD

BE: 1045

• AM

PM

4078443444 tested:
test ok

the date is:

month: 06

day: 08

year: 88

enter the dis-
position code:
0380

YOU CAN CHANGE THE MONTH
OR DAY TO MEET A COMMIT-
MENT IF YOU WERE INCOM-
PLETE AND CLEARED THE
TROUBLE THE DAY BEFORE.

ready to enter
cause information:
use menus

* INPUT CAUSE CODE

do you need special
studies codes?

yes

• NO

enter cause code:
210

do you want to
enter narrative?

• YES

no

FINISHED WORK ON
THIS JOB AT: 1120A
* TIME IS INCORRECT
time is correct

ABCDEFGHIJKLMNOPQRSTUVWXYZ

THIS IS WHERE YOU BACKUP YOUR
TIME TO MEET THE COMMITMENT
TIME AND THE 24 HOUR OUT OF
SERVICE COMMITMENT.

JOB CLOSED OUT.

NEXT for main menu