BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL 400060-T-FILED: June 16, 1993

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: WANDA S. BRENT

DATE:

June 29, 1993

TIME:

Commenced at: 3:40 p.m. Concluded at: 4:45 p.m.

PLACE:

Southern Bell Telephone and Telegraph Co. 666 Northwest 79th Avenue, Room 674

Miami, Florida 33126

REPORTED BY: JOHN J. BLUE,

Registered Professional Reporter,

Notary Public, State of Florida At Large

Suite 1014, Ingraham Building

25 Southeast 2nd Avenue Miami, Florida 33131

TAKEN BY:

The Citizens of Florida, by and through

Janis Sue Richardson, Associate Public Counsel

PURSUANT TO: Florida Rule of Civil Procedure

1.310 (b) (6)

APPEARANCES:

OFFICE OF PUBLIC COUNSEL

(BY: JANIS SUE RICHARDSON, ESQ.
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c/o The Florida Legislature
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THE FLORIDA LEGISLATURE
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SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY (BY: ROBERT G. BEATTY, ESQ.)
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ROBERT N. SCOLA, JR, ESQ. Suite 200 2400 South Dixie Highway Miami, Florida 33133 Attorney for Wanda Brent (305) 285-9600

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    WITNESS DIRECT CROSS
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    Wanda S. Brent
      (Ms. Richardson)
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      (Mr. Beatty)
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      (Mr. Greer)
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                             EXHIBITS
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17
                                     Identification
18
    Exhibit No. 1
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    Exhibit No. 2
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1	THEREUPON:	
2	WANDA S. BRENT,	
3	having been first duly sworn, was	
4	examined and testified as follows:	
5	DIRECT EXAMINATION	
6	BY MS. RICHARDSON:	
7	Q. Miss Brent, would you please state your name and spell	
8	it for the Court Reporter?	
9	A. Yes. It's Wanda S. Brent. W-A-N-D-A S. B-R-E-N-T.	
10	Q. And your address, please?	
11	A. 18560 Northwest 27th Avenue, Miami, Florida, 33056.	
12	Q. And your phone number?	
13	A. 305, 628-9276.	
14	Q. Are you represented here today by an attorney?	
15	A. Yes, I am.	
16	MS. RICHARDSON: I'll ask him to place his appearance	
17	on the record.	
18	MR. SCOLA: Robert Scola, on behalf of Wanda Brent.	
19	Q. (BY MS. RICHARDSON): Miss Brent, have you discussed	
20	this deposition here today with anyone other than your attorney	
21	or the attorneys for Southern Bell?	
22	A. No.	
23	Q. Has anyone advised you that you would not be	
24	disciplined based upon whatever answers you gave here today?	
25	A. Yes.	

Has anyone discussed with you the possible criminal Q. 1 penalties that could apply if you perjure your testimony? 2 A. Yes. 3 Have you given a statement to the company in the past? Q. 4 Yes, I have. A. 5 Do you remember when this was? Q. 6 I believe it was in October of '90. 7 A. Did you give just one statement? 8 Q. 9 A. I think I had -- I think I gave two statements. Do you remember when the second statement was made? 10 Q. I'm not sure. I believe it was after that. Α. 11 Was it within a few months? 12 Q. 13 A. Yes. Do you remember who was in the room with you when you 14 Q. 15 made your first statement? 16 Α. By name? We had Security, and it was Mr. Hampton. 17 And I don't remember the attorney, but we had Legal 18 also. Do you remember who was in the room with you when you 19 Q. made your second statement? 20 It was Legal, and also Security, but I'm not sure the 21 name of the Security Manager. It wasn't Mr. Hampton. 22 Did you discuss that statement with anyone? 23 Q. No, I haven't. 24 Α.

Did you discuss your first statement with anyone?

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Q.

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1	Α.	No.
2	Q.	What's your present position with the company?
3	А.	I'm Assistant Manager, North Dade IMC.
4	Q.	How long have you held that position?
5	A.	I have been an Assistant Manager, I believe it's 1979,
6	maybe, 1	979.
7	Q.	Is that a first level position?
8	A.	Yes, it is.
9	Q.	And when you work in the North Dade do you supervise
10	Maintena	nce Administrators?
11	Α.	Not now I don't.
12	Q.	Who do you supervise now?
13	A.	Dispatch clerks.
14	Q.	And how long have you been supervising dispatch
15	clerks?	
16	Α.	Since April of '91.
17	Q.	And prior to April of '91 were you supervising
18	Maintena	nce Administrators in North Dade?
19	A.	I supervised them from November of '90 until April of
20	'91.	
21	Q.	Before November of '90 what did your managerial
22	responsi	bilities involve?
23	Α.	I was a facilitator of training and a backup system
24	administ	rator; and that was in 1989 up until that time, I

believe around January 9th of '89 up until November of 1990.

- Q. And what does a facilitator of training do?
- A. We were introducing a lot of new features, touch star features, Caller ID, the call return and all that; and I would receive the information on the new technology and devise training and then train the maintenance administrators on the new technology.
- Q. And you said you were a backup system administrator. What were your duties with that?
- A. That whenever the assistant administrator was out of the office I would do his work, which was maintaining the computer systems. If the computers went down I would bring them up, that type of thing.
 - Q. Did that involve working with the MTAS reports at all?
 - A. No.
 - Q. Was it strictly a hardware?
- A. Yes.

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- Q. Before 1989, what were your managerial duties?
- A. I was assistant manager in the installation group of dispatch clerks.
 - Q. Was that also North Dade?
- 21 A. Yes, ma'am.
 - Q. And how long did you have that position?
- 23 A. I had that from 1982 until then.
 - Q. Can you tell me who your immediate I guess it was a second level supervisor was from that period of time when you

were supervising dispatch clerks in North Dade that first time, 1 you said '82 to '89? 2 I believe it was Charles Finney. Α. 3 Was he the only second level that you remember having Q. 4 from '82 to '89? 5 I believe -- I'm not sure. I'm thinking of Charles 6 Cunningham; I think he was during that time period. And also 7 Jonah Bradley. Between '89 and '90 when you were doing the 9 facilitating of training in the backup system administrative 10 position, who was your second level supervisor then? 11 12 Α. Joseph Lesko. 13 Q. Was he the only second level you had during that 14 period? 15 Α. Yes. 16 And then for your position supervising M.A.s from Q. 17 November of '90 to April of '91 who was your second level then? 18 Α. Ray Kummer. That's K-u--? 19 0. 20 A. -- m-m-e-r. 21 Q. Was there anyone else who was a second level for you at that point? 22

25 A. Carlos Quintero.

No.

Α.

Q.

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Who is your present second level supervisor?

Who is your present Operations Manager? 1 Q. A. Ralph De La Vega. 2 And when Mr. Kummer was your second lever, who was 3 Q. your Operations Manager then? 4 Jack Sellers. A. 5 And when Mr. Lesko was your second level manager who 0. 6 was your Operations Manager then? 7 8 A. Jack Sellers. And when you mentioned say the '88-'89 time frame when 9 Q. 10 you were again supervising dispatch clerks, who was the 11 Operations Manager at that time? 12 Α. We had two that I recall. Steve Calcavecchia. 13 Q. Can you spell that? 14 A. C-A-L-C-A-V-E-C-C-H-I-A. 15 0. That's wonderful. 16 Α. That's right. And also Jim Roach. 17 Q. Jim Roach. Okay. In supervising dispatch clerks, 18 what kind of work do the dispatch clerks do? 19 We receive orders for installation, for new 20 installations, and changes of customer service. That is when 21 they move from home to home, or they move into our area new, or 22 if they added jacks or premises work. 23 We receive the order, we prepare it for dispatch; and 24 over the years the technology has changed a little bit. We

used to live-dispatch someone and live-close them. Now it's

all done mechanically through the technician's CAT terminal. 1 We just prepare it and set it up into this system, and they 2 pick up the orders and close them out automatically now. 3 Okay. And you indicate installation. Did you also Q. 4 indicate repair? 5 No, not when I worked in installation, no. 6 Okay. 7 Q. That is from '89 until-- that was from '82 until '89. Α. 8 That was when I was in the installation type work; and now as 9 well, that's what I do now as well. 10 So at this point today in your present position you do 11 not supervise anyone who does repair work? 12 No, ma'am. 13 Α. 14 Q. When you were supervising M.A.s in '90 and early part of '91 did your M.A.s do repair trouble reports at that time? 15 16 A. Yes. 17 Q. When you were dealing with facility training and 18 backup system administration under Mr. Lesko, were you at all involved in the trouble repair process? 19 20 A. No. 21 I'd like to focus my questions and your responses, what we discuss here, on the period of time that you were 22

supervising individuals in the customer trouble repair process.

Are you aware of the company requirement that out of service reports be repaired within 24 hours?

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We have an objective to do that, yes. Α. Are you aware of the Commission, Public Service Q. 2 Commission, requirement that the company complete at least 95 3 percent of its out of service report repairs within 24 hours? 4 A. Yes, I am. 5 Do you know if a customer is due a rebate if they're 6 Q. out of service more than 24 hours? 7 8 A. Yes. Did you know that when you were supervising M.A.s in 9 Q. the North Dade Center? 10 11 Α. Uh-huh (Nods yes). I'm sorry; is that a "yes"? 12 Q. 13 Α. Yes, I did. 14 Q. Okay. 15 Α. I'm sorry. 16 Q. That's all right. He can't take head nods or uh-huhs. 17 I'd like to show you a document--18 Α. Okay. 19 -- Miss Brent. I'm going to introduce it for the Q. 20 record here. 21 This is Southern Bell's Response to Preliminary Order number PSC 93-0263 PCO-TL entered on February 19, 1993; and it 22 was filed by Southern Bell in the rate case docket on April 23 24 1st, 1993.

Is that a copy that you have in front of you?

1	A. It looks like it.
2	Q. Have you seen this document?
3	A. No.
4	Q. Then I want to go off the record for a moment and give
5	you a chance to look at it
6	A. Okay.
7	Q and discuss it with Mr. Scola.
8	(Discussion off the record, with the agreement
9	of the witness and all parties present)
10	Q. (BY MS. RICHARDSON): Okay. There are a series of
11	numbers by your name, and your name appears at number 52. I
12	believe there's a three, nine and 28 after your name?
13	A. Right.
14	Q. I'd like to ask you about number nine.
15	A. Okay.
16	Q. Number nine indicates that you may have some
17	information about test okays generally.
18	Can you tell me what a test okay report is?
19	A. If a customer's line tests okay, that means that they
20	do have service then; that's what that means, that their line
21	tests okay.
22	Q. Do you know if it's proper to take a test okay report
23	that's testing okay, the customer says they do have service,
24	and close it out as out of service?

Today the rules are if the customer reports that they

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A.

can't call out, no dial tone, can't be called, then they are stroked out of service; and if they test okay, then that is how it's stroked.

Q. All right. Prior to today, was it proper to take a test okay report where the customer, when contacted, said they

had service, and close it as an out of service report?

- A. Would you repeat that?
- Q. Certainly. At any time if you don't understand what I'm asking or you need me to rephrase it, I'd be more than happy to do that.
 - A. Thank you.

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- Q. And again at any time if you need to ask Mr. Scola something off the record, then we'll just go off the record and you'll have whatever time you need.
 - A. Thank you.
- Q. Okay. Prior to the present requirement on statusing test okay reports that you've just indicated--
 - A. Right.
 - Q. -- I want to go back to November of '91.

Was it proper at that time if a report was received tested okay, and the customer indicated that they were in service, to take that report and close it as out of service?

- A. That they were in service? Did they report themself out of service?
 - Q. No.

- A. No, that would not be.
- Q. Let me rephrase it just a little bit differently.

A report comes across, and it is statused as affecting service, and when tested by the M.A. it tests okay.

- A. Uh-huh.
- Q. Would it be proper to take that report and status it as out of service?
 - A. No.
 - Q. Have you ever heard of that being done?
- A. No.

- Q. Do you know of anyone who has taken a set of test okay reports and closed them as out of service?
 - A. Yes. I did that myself.
 - Q. Can you tell me when that occurred?
 - A. Yes, yes. It happened in July of 1990.

And what had happened, my mother passed away on July 24th of 1990. And when I came back to work on the Monday following her death I felt like I could not do my normal job, which was to develop training and so forth, I couldn't concentrate; and so I asked someone if I could-- I don't even know who I asked-- I just asked if I could help to do anything in the maintenance center to help them.

And they said yes, you can close out the test okay D.A. files.

So I took the file, and I-- which is a long printout

of trouble ticket numbers for all the customers, and I just one by one closed out each one of the reports in typing; and by mistake I stroked every one of the numbers on that list out of service.

And I didn't even realize that I was making a mistake until one of my-- another manager in the office just came by to visit me, you know, just to see how I was doing, my first day back and everything.

And he said "What are you doing?" Because I don't normally do that type of thing.

And I said that "I'm closing out," you know, "the test okay file."

And he looked; and he said "Well, you're not doing it right."

And I said "Oh." And I stopped immediately doing it.

And by that time I was almost finished with the entire list.

It was, you know, too late; I had already made the mistake.

- Q. Do you know about how many reports did you status?
- A. It was a lot, it was a long printout.
- Q. Would it have been--
- A. It might have been maybe 75, a hundred on the list.
- Q. Do you know if that had any effect at all on the company's out of service over 24 index?
 - A. No, I don't.

Q. Were you disciplined for that particular instance?

A. Well, we did look to see what was on the list as far as out of service and not out of service. And of course there were some customers on there that were out of service over 24 hours and some that were less than 24 hours; so we had customers that were rebated for over 24 hours and some that were rebated for less than 24 hours, not really rebated but they were stroked out of service.

so, you know, just -- I don't think it affected the index, because there was some of both on the list. You know. I just haphazardly just made every single one out of service without any thought to what I was doing, really.

- Q. Do you remember which manager came to you and told you?
 - A. Yes; it was Mr. Bourne, Claude Bourne.
 - Q. B-o-r-e-n?

- A. B-O-U-R-N-E.
- Q. B-O-U-R-N-E; okay. Do you know or have you heard of any other instances where test okay reports were stroked out of service to assist the company in meeting the Public Service Commission out of service index?
- A. I don't know if it was done for that reason. I know there was a test okay list that was statused out of service. I was on a feedback for one of our -- of our reviews, one of our reviews, and during the review brought out that there was some out of service statusing that was improper, there was some

troubles were statused out of service that shouldn't have been. 1 Was that in North Dade? Q. 2 A. Yes, it was. 3 Do you remember who that involved? Q. Well, it's just after the fact, you know. 5 A. 6 7 transpired with that occurrence with the exception of the fact 8 that it was brought out in the feedback I knew they were fired 9 for mis-statusing. 10 Do you know of any other instances other than the two 11 that you've indicated to me? 12 No, I don't. 13 A. When on your own instance that you referred to as 14 15 closing out the test okay file, did you ask anyone, since you 16 were unfamiliar with the system, how to process those on close 17 out? 18 No, I didn't. A. I believe by your name appears -- let's see -- is it 19 Q. number 27? 20 21 MR. SCOLA: Three, nine and 28, I think. 22 MS. RICHARDSON: 28? Okay. Yes. 28 indicates Mr. Falsetti, Miss D'Alessio, or Mr. Lesko. 23 24 Q. (BY MS. RICHARDSON): Do you know Frank Falsetti? 25 No, I don't. Α.

1	Q. Do you know of any occasion where a supervisor has
2	directed Maintenance Administrators to contact the supervisor
3	before closing out an out of service over 24-hour report?
4	A. No.
5	Q. Miss Brent, I'm going to place an exhibit on the
6	record here, and we'll mark this as Exhibit One. It is a memo
7	from a Wanda S. Brent to all Maintenance Administrators dated
8	February 14, 1991. And we'll mark that as Exhibit One.
9	We'll give you a copy. And one for Mr. Scola, and
10	Robert, one for each you and Nancy.
11	We'll go off the record until you've had time to look
12	at it.
13	(Thereupon the foregoing instrument was marked
14	OPC Exhibit No. 1 (Brent) for Identification, this date)
15	(Thereupon the deposition was recessed briefly,
16	with agreement by the witness and all parties present,
17	and was thereafter resumed)
18	Q. (BY MS. RICHARDSON): Miss Brent, did you write this
19	memorandum?
20	A. Uh-huh.
21	Q. And on this memo, what is the purpose of your
22	direction on the first paragraph:
23	"Prior to closeout, bring to the attention of cable
24	control out of service troubles that go over 24 hours"?
25	MR. BEATTY: I think it's appropriate that you read

into the record, as the rules of evidence enable and 1 actually require, the balance of that sentence, which is: 2 "This is to ensure proper disposition and cause code 3 usage by the technician." 4 MS. RICHARDSON: That's fine. 5 (BY MS. RICHARDSON): What was your purpose in Q. 6 directing this? 7 We wanted to ensure that troubles were basically A. 8 closed out when service was restored, and to the proper 9 disposition and cause codes. 10 Was this a direction to Maintenance Administrators 11 12 then? Yes, it was. 13 Α. All right. And are Maintenance Administrators trained 14 Q. on the use of disposition and cause codes? 15 No, ump-um. No, they -- they know a lot of the 16 A. codes; but basically the codes by the field are the field 17 codes, and the field technicians know those codes. 18 19 All right. And are Maintenance Administrators authorized to change the codes that are given to them by field 20 technicians? 21 No, they are not; but they-- No, they're not. 22 Α. 23 Then what further directions would a Maintenance Q. Administrator need to have in terms of ensuring that proper 24

disposition and cause code usage was done, if they couldn't

change the codes?

MR. BEATTY: Objection to the form of the question.

It's argumentative.

You can respond.

- A. I think what was happening— I'm trying to remember what was happening— I think that the cable control supervisor would speak with the facility technician and ask him how the trouble was cleared and what trouble was found, so as to ensure the proper disposition and cause code was given on the trouble, because the cable control supervisor knew the correct code, and just to ensure that the cable technician was using the proper code.
- Q. (BY MS. RICHARDSON): Do you know whether the cable technicians were trained on the use of disposition and cause codes?
 - A. Yes; yes, they were.
- Q. Do you know if they were covered on out of service reports that were cleared well within 24 hours on the proper use of cause and disposition codes?
- A. It doesn't really matter. The disposition and cause code had nothing to do with the time increment between 24 and over 24. It's the same code. It's based on the trouble cleared and where the trouble was found; the trouble found, and what caused the trouble.
 - Q. Do you know if there are certain disposition and cause

codes that would keep a report, an out of service report, from being counted as a miss against the company--

A. Yes, I do.

- Q. -- that went over 24 hours?
- A. Yes, I do.
- Q. Do you know if this instruction was interpreted by anyone to be a direction to use those particular disposition and cause codes to exempt out of service reports?
 - A. No.

MR. BEATTY: Objection

MR. SCOLA: Objection. I'm sorry about that.

MR. BEATTY: That's okay.

MR. SCOLA: This one calls for speculation as to what somebody else interpreted it to mean.

- Q. (BY MS. RICHARDSON): Do you know if placing the cable control on notice that they had a report that was over 24 hours, if that notice was used by cable control to place the exempt disposition and cause codes on reports?
- A. Not to my knowledge. I would say no, they would not do that.
- Q. Now, discussing the 24-hour time. Is there a certain time indication on a trouble report where the company counts whether or not that report was out over 24 hours?
 - A. From receipt to restoral.
 - Q. Do you know of anyone who backed up the restoral time

on a report that had gone over 24 hours to show that it had been repaired within 24 hours?

- A. Restored, no.
- Q. Do you know of anyone who backed up a commitment time on a trouble report?
 - A. No.

- Q. Paragraph two. Can you explain what your direction in paragraph two was intended to do?
- A. Yes. We wanted to make sure that we were getting the proper restoral time reported.
- Q. And why would there be a problem with getting the proper restoral time?
- A. Well, the technicians had a habit of giving us the close time versus the restoral time. They would restore service and then do other work, like maybe to clean up around the yard, do routines and things like that that had nothing to do with restoring service but before they proceeded to the next job; and that wasn't when they provided service. We wanted to know when they restored service.
- Q. This question or these instructions, were they followed for all out of service reports?
 - A. They should have been followed for all reports.
- Q. You indicate to bring to the attention of the assistant manager on the floor any trouble with an appointment missed by only 30 minutes or less.

A. That's what we found, that the interim was that they were showing their routine time, their clean up time too.

When the manager would look back, Mr. Lesko would say that there was a clearing time that might have been five minutes, ten minutes, whatever, over the time.

Then we thought, well, maybe these guys aren't showing the restoral time, they are showing the close time. And so we said well, you know, let's make sure that if they go over, we ask them when did they give service and then we will know that's the proper restore time.

- Q. Do you know of anyone who understood those directions as requesting them to back up the restoral time--
 - A. No--

- Q. -- to just reform--
- A. -- I don't know anybody that understood them that way.
- Q. Did you ever indicate to any M.A.s that they could assume that it would take an outside technician 30 minutes to do routine, so that if they received a clearing time or a closing time on the report that was just 15 minutes over the 24-hour hours that they could back it up?
 - A. No.
 - MR. BEATTY: Objection. Leading.
 - A. No.
- Q. (BY MS. RICHARDSON): Did this memo, after you sent it, correct the problems that you perceived?

Not all of them. We still had-- we still had--A. Well, 1 we had the employees that we had to-- they said "oh, you know, 2 I finished at noon but I went to lunch," or that type of thing. 3 Do you know what a no access is? 0. Yes. 5 A. What is a no access? 6 Q. When a technician is going to clear trouble, he's 7 Α. unable to because the customer needs to give him access either 8 to the yard or the inside of the house, and they're not home, 9 it's no access. 10 Do you know if the no access code stops the 24-hour 11 12 repair clock? 13 A. I don't know. 14 Do you know of anyone who no accessed a report before Q. 15 it was dispatched? 16 A. No. 17 Do you know of anyone who no accessed a report when Q. 18 they did have access to the premises? 19 Α. No. 20 Do you know what the CON Code is, carried over no? 0. 21 A. No. 22 The C O N code? Q. 23 Α. No. 24 Q. Do you know how to exclude reports? 25 Α. Yes.

- Q. And how is that done?
- A. Well, I just know physically that you go into the data base and you show it excluded and you show proper narrative based on why it's excludable. Is that what you mean?
- Q. Right. And do you know if it's proper to exclude out of service report?
 - A. No.

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- Q. So it is not proper, is your answer? Or you don't know?
- A. That's not a -- out of service report. Depends. I couldn't think of any reason.

Well, the only thing I can think of is a service order due the same day. But those reports are excluded and the service orders are worked.

- Q. Okay.
- A. That's the only one I can think of where a customer might be out of service.
 - Q. All right. Other than that instance--
 - A. I can't think of anyone.
- Q. -- do you know of anyone who has excluded an out of service report?
- A. No.
- Q. Do you know what an employee report is?
- 24 A. Yes.
 - Q. Can you briefly explain an employee report?

- If an employee discovers a service condition affecting Α. 1 service or an out of service condition and he discovers it on 2 his own and reports it to the company, that's an employee 3 report. Do you know of anyone who has originated a customer 0. 5 direct report as an employee report? 6 No. Α. 7 Do you know of anyone who has taken an out of service Q. 8 report that was about to go over 24 hours and closed it out, 9 then reopened it as an employee report--10 11 Α. No, I don't. -- to clear and close? 12 Q. 13 No. Α. Do you know anyone who has taken a batch of service 14 Q. affecting reports, other than what we may have already talked 15 16 about with the Test Okays, and closed them out as out of service? 17 18 A. No. 19 Q. Do you know of anyone who has used someone else's 20 employee code? 21 Α. No. 22 Has anyone ever used yours? Q. 23 Α. Not to my knowledge.
 - a customer record?

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Do you know of anyone who has put false information on

A. No.

- Q. I guess I should clarify. Other than what we may have already talked about today?
- A. Yes, that was inadvertently done, in my case. No, I don't.
- Q. On your particular case with test okay and out of service, do you know if any corrections were made to the reports the company made to the Public Service Commission regarding their out of service over 24-hour status?
 - A. I don't know.
 - Q. Have you ever heard the phrase "building the base"?
 - A. Just since the investigations.
 - Q. What does that mean to you?
- A. I really don't-- I really don't know. I think it's -- I really don't know what it means.
- Q. Miss Brent, I'm going to show you a couple more documents, but we are not going to make them part of the record.
 - A. Okay.
- Q. And unfortunately I only have one copy, so after each one I'll go off the record and anybody that would like to see it, we'll take time to pass it around so everyone can see it, and then when we're ready we'll go back on the record.
 - A. Okay.
 - Q. This is a series of management performance rating

reports, that have-- the first one has the name "Wanda s. 1 Yoder, " "Y-o-d-e-r." Is that you? 2 That's me. 3 Α. Then I can show it to you, because it's yours. Q. Uh-huh. Α. 5 The bottom date has a signature of Wanda S. Yoder as 6 Q. Assistant Manager dated March 30, 1988. 7 Okay. At this point I'll go off the record and we 8 will let everybody look at it, and then I'll ask you one or two 9 questions about that. 10 THE WITNESS: Okay. 11 MR. BEATTY: Did you say that you are not going to 12 make this a part of the record? 13 MS. RICHARDSON: Yes. I just want to ask one question 14 on it, basically. 15 MR. BEATTY: Well, then I'd like to know what question 16 you're going to ask, if you're not going to put it on the 17 record. 18 MS. RICHARDSON: Well, I can. I only have one copy; I 19 can't distribute copies to you. I can make the one copy 20 the Exhibit copy for the record, but since it's a 21 personnel file form I thought it would be better-- we've 22 done this in the past with others-- we've not made them 23

part of the record but I've asked questions on them; so,

because of the personal nature of the form I decided that

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we wouldn't make part of one, but if you're uncomfortable 1 with that I can introduce it. 2 MR. BEATTY: Well, let's see. 3 (Discussion off the record, with the agreement 4 of the witness and all parties present) 5 MS. RICHARDSON: As further identification of this 6 document, the cover page has the form number RF5093-A and 7 there's a 5100 identification number on the document 8 attached to it. 9 (BY MS. RICHARDSON): Miss Brent, I really only have I 10 0. think one or two questions on this. 11 12 As part of your evaluation, are you evaluated on whether or not you assisted the company in meeting the out of 13 14 service over 24-hour index? MR. BEATTY: Object on the grounds of relevancy. 15 16 Unless there's some time frame to tie this up. 17 THE WITNESS: Is this the QR-12 data that you're talking about? 18 19 MS. RICHARDSON: 20 It was part of our 5100. 21 (BY MS. RICHARDSON): Evaluation. And which year are Q. we discussing here on this particular 5100? 22 23 This is 1987. Α. 24 1987. And during that year were you successful in 25 assisting the company in meeting its out of service over

30 24-hour index throughout the year? 1 Actually I didn't have any part in helping it or 2 hindering it. It was on my appraisal because it was part of my 3 boss's appraisal. And who was your boss at this time? 5 0. At this time it was Manny Carreno, M. Carreno. 6 Α. C-a--? 7 Q. 8 Α. -- r-r-e-n-o. Thank you. What were your particular job duties at 9 Q.

- that particular time?
 - A. I had the dispatch clerks on installation.
 - Q. That's all on that document.

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Okay. The next one-- I'm trying to do these in order -- is again a management performance rating for a Wanda Brent, and the form number is RF5093-A, and it is signed by Wanda S. Yoder on February 14, 1989; and there is attached a 5100 form.

And we'll go off the record again and give you time to look at this one.

(Discussion off the record, with the agreement of the witness and all parties present)

- Q. (BY MS. RICHARDSON): Miss Brent, is this your personal evaluation form?
 - A. Yes, it is.
 - Q. And was part of your evaluation in that year the

company's performance on the PSC out of service index? 1 2 It is on this form. And was the company successful in every month in 3 Q. meeting the index in that year? 4 No, no. 5 Α. Which one did they miss? 6 Q. December. 7 Α. And how much did they miss it by? 8 Q. It's 94 dot zero. 9 Α. And again which year was this particular evaluation? 10 Q. 1988. 11 Α. Were you personally involved in assisting with meeting 12 Q. of that requirement? 13 14 A. No. And why does it show up on your evaluation form? 15 0. The second level's evaluation was like this and all 16 Α. the assistance managers had the same evaluation form. 17 18 Q. All right. MR. BEATTY: I think the record needs to reflect that 19 20 the witness was reading from the document when she quoted 21 the 94 point zero, I believe--22 THE WITNESS: Yes. 23 MR. BEATTY: -- amount. 24 MS. RICHARDSON: Okay. 25 Q. (BY MS. RICHARDSON): Miss Brent, I'm going to show

you another evaluation form with Wanda Brent at the top, and this again is a management performance rating RF5093-A. It is signed by Wanda S. Brent on February 27th, 1990; and there is attached to it a 5100 form also. And attached to that is another form that is a 5093 dash B, and another one which is a dash C.

- A. (Examining instruments)
- Q. Miss Brent, was part of your evaluation the performance of the company on the out of service over 24-hour index during this year, 1990?
 - A. Yes. 1989.
 - Q. 1989?
 - A. (Nods yes)
- Q. And was the company successful in meeting that index on your evaluation form?
 - A. Yes.
 - Q. Did they miss any month?
- 18 A. No.

- Q. Were you at all involved in assisting the company to meet this index during this year?
 - A. No.
 - MR. BEATTY: Again the record should reflect that the witness's responses are predicated upon her review, her reading from the document in question.
 - Q. (BY MS. RICHARDSON): All right. The next management

performance rating RF5093-A is for Wanda S. Brent; it was signed by Wanda S. Brent on January 22, 1991; and it has attached to it a 5100 form and a form MJE Form 11-C, a management job evaluation composite job description form.

(Discussion off the record, with the agreement of the witness and all parties present)

- Q. (BY MS. RICHARDSON): Miss Brent, is this for the year 1990?
 - A. Yes.

- Q. During that year, as part of your performance evaluation did it include whether or not your division met the PSC out of service over 24-hour index?
 - A. No.
- Q. Did it include a description of your work with certain analytical reports, in the job description attached? Not on your 5100 form but on your job description attached?
 - A. Would you repeat the question?
- Q. Yes. On your job description does it indicate that you worked with analytical reports for the company, that you monitored certain trouble reports?
 - A. It says I could. But I didn't.
 - Q. You did not actually do that?
 - A. No.
- Q. Okay. And then the last one that I have for you is again a management performance rating, the form number is not

on this particular copy but I assume it's the same. 1 Brent; and it is signed by Wanda Brent on March 10th, 1992. 2 And it also has a 5100 form attached to it. 3 (Discussion off the record, with the agreement 4 of the witness and all parties present) 5 (BY MS. RICHARDSON): For this 1991 evaluation, Q. 6 Miss Brent, was your area's meeting the out of service over 7 24-hour index part of your performance appraisal? 8 9 A. Yes. Were you involved during that year with trouble 10 Q. 11 reports? Α. 12 Yes. 13 Was your actual work then part of this meeting of this Q. criteria of out of service over 24? 14 15 Α. Yes. 16 And was the company successful in meeting the 95 Q. 17 percent index in that year? 18 No, not in all months. A. 19 In which months did the company miss? Q. 20 A. In I'm reading June, July, August, October, November, 21 December. 22 MR. BEATTY: The record should reflect the witness is 23 reading from the document. 24 (BY MS. RICHARDSON): Okay. And would you tell me, 25 for each of the six months that you've indicated the company

did not meet the 95 percent index, would you indicate what this 1 document states as to each month--2 I object. MR. BEATTY: 3 MS. RICHARDSON: -- what is the actual report? MR. BEATTY: I object to the form of the question. 5 The document is the best evidence of what the document 6 7 says. This witness, at least there's been no predicate in 8 this record that this witness had any independent 9 recollection of the subject matter of Counsel's question, 10 and therefore I would object. I would suggest that if, in 11 fact, the counsel needs that kind of specificity, that 12 counsel take appropriate action to make this document of 13 record. 14 Okay. Miss Brent, we'll make this 15 MS. RICHARDSON: particular document Exhibit Two for the record. 16 17 (Thereupon the foregoing instrument was marked OPC Exhibit No. 2 (Brent) for Identification, this date) 18 19 (BY MS. RICHARDSON): Then for the purposes of our 20 discussion, would you please tell me what Exhibit Two indicates 21 as to the index met on June of that year? 22 MR. BEATTY: Again I object. Now that the document is 23 of record, there's absolutely no basis to have this 24 witness read from this document on matters for which

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there's no predicate that she has independent knowledge.

1	Q. (BY MS. RICHARDSON): MISS Blenc, and you sign this
2	document?
3	A. Yes, I did.
4	Q. And when did you sign this document?
5	A. I signed it on January 15, '91, July 26, '91, and
6	January 30, '92.
7	Q. And when you signed this document did you read this
8	document?
9	A. Yes.
10	Q. Did you read all this information that was in the
11	document?
12	A. Yes.
13	Q. And would you please indicate to me what the company
14	has on your document as indicating the repair index having been
15	met on June of that year?
16	MR. BEATTY: In light of Counsel's voir dire on the
17	issue of the independent recollection of this witness,
18	allow me then to voir dire.
19	VOIR DIRE
20	BY MR. BEATTY:
21	Q. Miss Brent, do you have an independent recollection as
22	you sit here today as to the information contained in this
23	document, with respect to the question that Counsel has just
24	asked?
25	A. No. Not without looking at it.

Again I renew my objection. This witness MR. BEATTY: has no independent recollection of the information contained in this document, with respect to Counsel's question, and I don't think it's appropriate for you to ask. DIRECT EXAMINATION (Continued)

BY MS. RICHARDSON:

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- Okay. Miss Brent, you indicated that there were six Q. months where the company did not meet the PSC repair index. October I believe it indicates on Exhibit Two that the company missed it by a fairly wide margin, down around 70 percent or so. Do you recall that occurrence?
 - Α. No, I don't.
- Do you recall any reason for this particular year Q. where six months were missed on the index as opposed to the other years that we've already discussed where the company was more successful in meeting the index?

MR. BEATTY: If you recall.

- No, I don't. Α.
- Q. (BY MS. RICHARDSON): Do you recall any discussion among other managers as to why the company was having so much trouble meeting the PSC repair index in this particular year as opposed to prior years?
 - Α. No.

MR. BEATTY: If you recall.

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1	A. NO.
2	Q. (BY MS. RICHARDSON): Did the missing of index in the
3	six months of '91 have any impact on your overall rating on
4	your performance of this particular year?
5	MR. BEATTY: If you recall.
6	A. No, I don't think so. I think I had the same rating.
7	Q. (BY MS. RICHARDSON): In your supervision of
8	Maintenance Administrators in the period that that year covers,
9	were any procedures changed that might explain in your mind the
10	lowering of the results in meeting the PSC index?
11	MR. BEATTY: Objection to the form of the question.
12	The question calls for this witness to speculate as to
13	the cause and effect; and there's no predicate in this
14	record that she has the ability or knowledge to do so.
15	MS. RICHARDSON: You can still answer.
16	MR. BEATTY: If you can.
17	A. No.
18	MR. BEATTY: Are you say "no," or that you don't know?
19	A. I don't know, I don't know of anything that was
20	different.
21	Q. (BY MS. RICHARDSON): Miss Brent, are you or have you
22	ever participated in an operational review by network staff?
23	A. On the receiving end. They just reviewed us. I
24	never I never did a review.
25	Q. All right. Did you ever assist with a review in

any way? 1 No. 2 Α. Did you ever receive feedback from an operational Q. 3 review? 4 Yes. 5 A. When did that occur? 6 0. They occur from time to time, yearly. 7 Α. Okay. 8 Q. A. Sometimes more often, sometimes six months. 9 10 No, I'm sorry. Operational I believe is one month--I'm sorry-- one year; excuse me. 11 12 One a year? Q. Yes, I think so. 13 Has there ever been an occasion where you have 14 Q. participated in a feedback where there was an indication that 15 16 there was a major problem in your center? 17 Α. Yes. 18 And can you tell me what the major problem was? 0. 19 Well, the only thing that I'm aware of is that the 20 review brought out mis-statusing of test okays to out of 21 service. 22 Q. Was that the incident that you reported to me earlier? 23 Yes. Α. 24 In any of the other feedbacks that you participated Q.

in, were you given any other type of problems of that nature--

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or of that magnitude, I guess? 1 No. Α. 2 Was there a rereview done after that particular 0. 3 operational review? 4 A. Yes. 5 Do you remember what the results of that rereview 6 Q. were? 7 No. Α. 8 Have you participated in any or received feedback from Q. 9 any other operational reviews where followup reviews were done? 10 I'm sure we got feedback. 11 I guess "rereviews" instead of "followup reviews" is 12 Q. what I meant. When the staff came back to review that same 13 14 problem again--15 A. Oh. -- to see if it had been corrected? 16 Q. I don't know, I don't know. 17 Α. Have you ever been disciplined for your handling of 18 Q. 19 trouble reports? A. 20 No. 21 Has anyone ever filed a grievance against you? Q. 22 No. A. 23 Have you ever been asked to participate in sales for Q. 24 the company? Yes. 25 A.

Will you tell me when this occurred? Q. 1 I believe in the late 1980s we had a gold line 2 campaign per se for sales. And if we had any sales for 3 ourselves or our family or our friends, then we would turn them 4 in, and that type of thing. 5 And about-- do you remember what years or year this 6 Q. 7 occurred? I'm thinking that also in 1989, I think that was in 8 the year '88, '89, right around in there, that we won the gold 9 line program. 10 Do you recall which supervisor spoke to you about 11 12 participating in the sales program? I don't know. I think maybe Manny Carreno when-- I 13 Α. think maybe he was the second level at the time. 14 15 Q. Okay. 16 And probably into Joe Lesko during that time period. Α. 17 Did you yourself ever sell a product or a service to a Q. customer? 18 19 I don't think so. Α. 20 Q. Did any of the employees that you supervised ever sell 21 an actual product or a service to a customer? 22 A. Themselves, no.

Were you ever eligible for any prizes or points based

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Q.

A.

upon sales --

Yes.

-- from the people you supervised? Q. 1 Yes, I was. Α. And did you actually receive any prizes? 3 Q. Yes, I did. 4 A. What did you get? Q. 5 I got a toaster. A. 6 When you supervised these individuals who were 7 Q. assisting with sales, did you give them any additional sales 8 training for this? 9 No, they didn't. 10 Α. Were you ever asked to have the people that you 11 Q. supervised keep track of the amount of time they spent selling 12 13 as opposed to the amount of time they spent helping customers 14 with repair reports? 15 Α. At this time I was in installation, not repair. 16 Q. Okay. 17 Α. And it was not separated, the time was not separated. 18 Q. When you were supervising individuals in installation, did those individuals keep track of their time by regulated and 19 20 deregulated codes? 21 A. No. 22 Q. Did they keep track of the sales time by regulated or 23 deregulated codes? 24 A. We didn't have deregulated or regulated codes. 25 MS. RICHARDSON: All right. Miss Brent, I believe

that's all the questions I have for you today. I thank 1 you for appearing. 2 I don't know if there may be some questions from 3 someone else. 4 MR. GREER: Yes. 5 BY MR. GREER: 6 Miss Brent, I believe you said that you had statused 7 some Test Okays as out of service; is that correct? 8 That's correct. 9 And I think you also said that there was a feedback 10 review that identified a problem with test okays being statused 11 out of service? 12 13 A. Right. Do you know if those were the same or if--14 15 No, there was-- No. The test okays I closed out were A. 16 in July. 17 Q. Okay. And do you know what time frame the feedback review covered? 18 19 Α. No, I'm sorry. 20 Q. But it's your understanding that they were not the 21 same? 22 A. No. 23 MR. GREER: Okay. That's all I have. 24 MR. PIERSON: No questions. 25 MR. BEATTY: That's it.

1	MS. RICHARDSON: Thank you, Miss Brent.
2	(Thereupon the deposition was concluded at 4:45 p.m.)
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6	(Date) Wanda S. Brent
7	(bace)
8	
9	
10	Sworn to and subscribed before me this day
11	of, 1993.
12	
13	Notary Public, State of Florida At Large
14	
15	My Notary Commission Expires:
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JOHN J. BLUE & ASSOCIATES - MIAMI, FLORIDA

1 STATE OF FLORIDA) 2 CERTIFICATE OF REPORTER : ss. COUNTY OF DADE) 3 I, JOHN J. BLUE, Registered Professional 4 Reporter, Certified Shorthand Reporter and Notary Public in and for the State of Florida at Large, 5 DO HEREBY CERTIFY that the deposition of WANDA 6 S. BRENT, a witness called by the Citizens of the State of Florida in the above-captioned matter, Docket No. 7 910163-TL, was heard at the time and place herein stated; that the witness was by me first sworn to tell the truth; 8 it is further 9 CERTIFIED I reported in shorthand the said deposition; that the same has been transcribed under my 10 direct supervision, and that this transcript, consisting of 44 pages, constitutes a true and accurate 11 transcription of my notes of said deposition; it is further .12 13 CERTIFIED that I am neither of counsel nor related to the parties in said cause and have no 14 interest, financial or otherwise, in the outcome of this docket. 15 16 IN WITNESS WHEREOF, I have herunto set my hand at Miami, Dade County, Florida, this 19th day of July, 17 1993. 18 19 20 Registered Professional Reporter Certified Shorthand Reporter and 21 Notary Public In and for the State of Florida At Large 22 1014 Ingraham Building 25 Southeast 2nd Avenue 23 Miami, Florida 33131 (305) 371-6228 24 My Notary Commission Expires: 25 December 21, 1993

1	REPORTERS DEPOSITION CERTIFICATE WITH ACKNOWLEDGMENT
3	STATE OF FLORIDA)
4	COUNTY OF DADE)
5	I, JOHN J. BLUE, Registered Professional Reporter, certify that I was authorized to and did
6 7	stenographically report the foregoing deposition and that the transcript is a true record of the testimony given by the witness.
8 9 10	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.
11	Dated this 19th day of July, 1993.
12	M. A. S.
13 14	JOHN JU BLUE Registered Professional Reporter
15	STATE OF FLORIDA
16	COUNTY OF DADE
17	The foregoing certificate was acknowledged
18	before me this 19th day of July, 1993
19	by JOHN J. BLUE, who is personally known to me.
20	(Imas Kul)
21	Amar Kredi
22	Notary Public - State of Florida My Commission No. CC194782
23	Expires: May 16, 1996
24	
25	

FEBRUARY 14, 1991

MEMORANDUM TO: ALL MAINTENANCE ADMINISTRATORS

SUBJECT:

CLOSEOUT WITH FIELD TECHNICIANS

008 >24 HOURS / MISSED APPOINTMENTS 2

UPON CLOSEOUT WITH A FIELD TECHNICIAN, PLEASE CONTINUE TO BE COGNIZANT OF THE RECEIPT TIME ON OUT OF SERVICE TROUBLES. PRIDE TO CLOSEOUT, BRING TO THE ATTENTION OF CABLE CONTROL OUT OF SERVICE TROUBLES THAT GO OVER 24 HOURS. THIS IS TO ENSURE PROPER DISPOSITION AND CAUSE CODE USAGE BY THE TECHNICIAN.

IN ADDITION, EFFECTIVE IMMEDIATELY, PRIOR TO CLOSEOUT, PLEASE BRING TO THE ATTENTION OF THE ASSISTANT MANAGER ON THE FLOOR ANY TROUBLE WITH AN APPOINTMENT MISSED BY ONLY 30 MINUTES OR LESS. BE SURE TO PROMPT THE TECHNICIAN TO DETERMINE EXACTLY WHEN SERVICE WAS PROVIDED. THE TIME SERVICE WAS PROVIDED IS THE CLEARED TIME WHICH, MOST OF THE TIME, IS BEFORE THE CLOSED TIME.

IF YOU HAVE ANY QUESTIONS, PLEASE ADVISE.

YOURS TRULY,

ASSISTANT MANAGER

O/ J. W. SELLERS, OPERS. MGR.

R. J. KUMMER, MANAGER, IMC

C. B. FINNEY, MANAGER, I&M

C. W. LITTLE, MANAGER, OPCC

C. E. MOBERG, MANAGER, SSIM

ALL ASSISTANT MANAGERS, IMC

Brew EXHIBIT

OPC#1

56-2993

Management Performance Rating

Name Wanda Brent		Assistant Manager	Pa, Graze
Department		Location Hanager	
Network		18560 NW 27 AVENUE, ROOM 330	
	-01-91 _{To} 12-31-91		
Performance Rating:	Major Contribution (MC)	
	Contribution (C)		
	Unsatisfactory Contribu	ution (UC)	
	Not Rated (NR)		
Supervisor's Comments:			
	Guitero	Tille Manager	Date 3/10/97
Approval	4-	Operations Manager	3/10/82
mployee Comments			
This Space is Provided Fo	or Employee To Write Comme	nts. If Desired.)	
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Have Received Feedback C	On My Performance Rating	Tin	
Han	de & Brent	Title asst Mgr	03-10-93
	7 /	Reproduce For Local Hea	- FXHIBIT



PERFORMANCE COMMITMENT

S. BRENT	: Position : CE766	n Descript	tion No.		Pay Grade 3	Supe C.	EVISOR DUINIEXO		Review Pe 01-01-91	to 12-31	-91		- 			
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Report Rate Maintain a network report rate of 2.95%	; ; ; 3.05	2.60	3.03	2.83	3.05	3.19	3.69	3.12	3.68	3.38	3.28	3.21	5.22	3.07	2.97	3.37
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DESTINATION PROPERTY.	: : : : : : : : : : : : : : : : : : : :				:				:							

PERFORMANCE COMMITMENT

NAYE NANDA S. BRENT	: Positio : CE166	n Descrip	otion No.		Pay Gra	ide (Si	pervisor DUNIERO		Review 6		1-91					
, Comitments	First Quarter			Second Quarter			Third Guarter				Fourth Duarter					
	JAN	FEB	MR	OTY	APR	НАУ	JJÆ	OIY	July	AUG	इश	YTO	oct -	VOV	ŒĽ	YID
9. FPSC 00S within 24 hours 95% or better	96.38	91.23	95.99	%,53	97.42	95.49	91.46	94.79	94.35	93.02	95.03	95.20	76.94	85.8 2	90.49	92.50
95% of orders within 30 days	; ; 91.70 ; 99.40 ;100.00	94.90 99.80 100.00	91.60 99.50 100.00	-	; ; 91.90 ; 99.50 ;100.00	95.06 99.84 100.00	99.77		90.5 99.9 100.0	90.8 99.5 99.9	94.3 99.9 100.0	-	. 86.2 . 99.8 . 100.0	72.3 99.8 100.0	91.0 99.7 100.0	-
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	PERFURIYME	The state of the s	Review Period 01-01-91 to 12-31-91	
	Position Description No.	Pay Grade Supervisor C. DIINIERO	01-01-91 to 12-31-71	
re NDA S. BRENT		Second Quarter	Third Duarter	Fourth Querter
Consitants	First Quarter	38.CM 32.		
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upport BellSouth's commitment to Equal aployment Opportunity (EED) by:	act			
Understanding the Corporate EEU and Affirmative Action policies, programs and procedures				
Helping ensura that the work environment is free of haracement or unlawful discrimination				
-Considering qualified females and minorities for sanagement vacancies, particularly when a departmental imbalance exists.				
-Making all non-management employees mears of opportunities for self-development, career enhancement, and future growth in a non-discriminatory memory.				
Employee Devalopment				
Encourage and support career developmental programs for self and where applicable) subord to include activities aimed at achieving busin goals through individual growth.	mates ess	act act	gaet paet	act act
-Self -Subordinate	net net	**		
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Safety Administer the B.S.A.P.P.	pel	<u>act</u>		
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PERFORMANCE COMMITMENT

		Position Description No.	R-1-KIMME	: Review Period : 01-01-91 to 12-31-91	
AGNAW	S. BRENT	CE766	3 C GU.NTER	¢	
Comi	itaents	First Quarter	Second Quarter	Third Quarter	Fourth Quarter
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			i to the order to which w	b responsibilities not	
enecifically cove	eced by commitments were inti-	nd 2.05, some consideration sh illed. The ⊬may m subordinate ac	ould be given to the extent to which so complishes his/her commitments should a	also be reflected in the	
assignment of the	e Performance Kating.			0 1	
ese comitments have Naudu	been agreed upon by the super	1-15-91	·	Supervisor's Signature	11111111 1-15-7
Employee's Signat				(iu :
iarterly eniannial eview	Results	· :		ic i	:c :
epletedi	ļ				1/30/92
	:Dates	;	1/26/91		:
	: Employee's Instrals:		WSB		ws8
	¡Date:	1	7/20/91		1/30/92
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