

BEFORE THE
 FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
 FILE COPY

920260
 DOCKET NO. 910163-TL
 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: KATHLEEN MINUS

DATE: June 29, 1993

TIME: Commenced at: 10:54 a.m.
 Concluded at: 11:32 a.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)

DOCUMENT NUMBER - DATE

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FPSC-RECORDS/REPORTING

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Coral Gables, Florida 33134
Attorney for Kathleen MinuBrooks
(305) 461-5100

ALSO PRESENT: Robert Freeman, Union Representative

I-N-D-E-X**WITNESS****DIRECT CROSS**

Kathleen Minus

(Ms. Richardson)

4 --

EXHIBITS

(None)

1 THEREUPON:

2 KATHLEEN MINUS,

3 having first duly affirmed to tell the whole truth,
4 was examined and testified as follows:

5 DIRECT EXAMINATION

6 BY MS. RICHARDSON:

7 Q. Miss Minus, would you please state your name and spell
8 it for the Court Reporter?

9 A. Kathleen Minus. K-a-t-h-l-double e-n. M-i-n-u-s.

10 Q. Thank you. And your address, please?

11 A. 115 Alhambra Circle.

12 Q. Is that Miami?

13 A. Coral Gables, Florida.

14 Q. And the Zip Code for that, please?

15 A. I don't remember that one.

16 Q. Is that a business address?

17 A. Yes, it is.

18 Q. And your phone number, please?

19 A. 441-5137.

20 Q. Thank you. And are you represented here today by an
21 attorney?

22 A. Yes, I am.

23 MS. RICHARDSON: I'll ask him to place his appearance
24 on the record.

25 MR. ALVAREZ: Arturo, A-r-t-u-r-o, Alvarez,

1 A-l-v-a-r-e-z. Alvarez, Armas and Borron. B-o-r-r-o-n.
2 2151 Southwest LeJeune Road, Suite 202.

3 Q. (BY MS. RICHARDSON): And Miss Minus, are you
4 represented here today by a Union representative?

5 A. Yes, I am.

6 MS. RICHARDSON: I'll ask him to place his appearance
7 on the record.

8 MR. FREEMAN: Robert Freeman, R-o-b-e-r-t
9 F-r-e-e-m-a-n. Address is 3080 Southwest 30th Ave (sic),
10 Miami, Florida; phone number is 441-6730.

11 MS. RICHARDSON: Do you have the Zip code for that
12 address?

13 MR. FREEMAN: No, I don't.

14 MS. RICHARDSON: Okay. Thank you, Mr. Freeman.

15 Q. (BY MS. RICHARDSON): Miss Minus, have you discussed
16 this deposition here today with anyone other than your attorney
17 or the attorney for Southern Bell?

18 A. No.

19 Q. Have you been advised that you would not be
20 disciplined based upon whatever you told us here today?

21 A. Yes.

22 Q. Has anyone advised you of the possible criminal
23 penalties that could apply if you perjure your testimony here
24 today?

25 A. No.

1 Q. In the questions that we ask you will you agree to
2 tell us the truth?

3 A. Yes.

4 MR. BEATTY: I would object to that. . That question is
5 wholly inappropriate. This witness is here, she
6 understands the obligation when one raises his or her hand
7 and swears to tell the truth, the whole truth, and nothing
8 but the truth. She's done that; and it is inappropriate
9 for Counsel to inquire, because it seeks to intimidate the
10 witness, and I suggest to you that that's improper.

11 Q. (BY MS. RICHARDSON): Miss Minus, if you felt
12 intimidated by that question I apologize. It was not intended
13 to intimidate you at all.

14 Would you please tell me what your position is with
15 the company?

16 A. Maintenance Clerk.

17 Q. Maintenance Clerk. How long have you held that
18 position?

19 A. I don't know.

20 Q. Do you remember when you started with the company?

21 A. Yes.

22 Q. What year did you start?

23 A. 1968.

24 Q. '68. And what was your entry position with the
25 company?

1 A. An operator.

2 Q. Was that long distance?

3 A. Just regular.

4 Q. Regular. And do you remember about how many years you
5 were an operator?

6 A. No.

7 Q. Do you remember giving a statement to the company in
8 the past?

9 A. A statement--

10 MR. ALVAREZ: I'll ask you to specify in relation to
11 what or a time period.

12 Q. (BY MS. RICHARDSON): Do you remember in the last
13 three to four years whether you gave a statement to a company
14 investigator regarding the repair reports?

15 A. Yes.

16 Q. Do you remember when you gave that statement?

17 A. No.

18 Q. Do you remember who was in the room with you when you
19 made that statement?

20 A. No.

21 Q. Do you know if there was an attorney present when you
22 made that statement?

23 A. No.

24 Q. Do you know if there was someone from Security present
25 when you made the statement?

1 A. Yes.

2 Q. Did you have someone from the Union with you when you
3 made your statement?

4 A. No.

5 Q. Did you give more than one statement to the company?

6 A. No.

7 Q. Did you discuss that statement with anyone?

8 A. No.

9 Q. Have you held any other positions with the company
10 besides being an operator and a maintenance clerk?

11 A. No.

12 Q. If you could estimate for me an approximate time point
13 for your beginning your position as a maintenance clerk, either
14 mid-'80s, late '80s, '90s; some kind of time frame that we can
15 go by?

16 A. No.

17 Q. Have you been a M.A. for at least one year?

18 A. Yes.

19 Q. Have you been a M.A. for at least three years?

20 A. No.

21 Q. Can you tell me what position you held before you were
22 an M.A.?

23 A. It was just a clerk.

24 Q. Just a clerk, I'm sorry. Have you ever been a
25 Maintenance Administrator?

1 A. Yes.

2 Q. All right. And can you tell me what center you worked
3 in as a Maintenance Administrator?

4 A. Metro.

5 Q. That's Miami Metro?

6 A. Yes.

7 Q. Can you tell me approximately when you were in the
8 Miami Metro center?

9 A. No.

10 Q. Can you put it early '80s, late '80s, '90s?

11 A. Early '80s.

12 Q. Do you know who your first level manager is right now,
13 this time period?

14 A. Yes.

15 Q. Would you please tell me who that is?

16 A. Mrs. Kearse.

17 Q. Can you spell her last name?

18 A. K-E-A-R-S-E.

19 Q. And do you know her first name?

20 A. Margaret.

21 Q. Can you tell me how long Miss Kearse has been your
22 first level manager?

23 A. Two years.

24 Q. Who was your first level manager before Miss Kearse?

25 A. I don't remember.

1 Q. Do you remember any of your first level managers when
2 you were Maintenance Administrator in Metro?

3 A. Yes.

4 Q. Would you please tell me who you remember?

5 A. Richard Bird.

6 Q. Is he the only one that you remember?

7 A. Yes.

8 Q. Who is your present second level manager?

9 A. Rick Hagen.

10 Q. How long has Mr. Hagen been your second level manager?

11 A. A year.

12 Q. About a year? Do you recall who it was before
13 Mr. Hagen?

14 A. Yes.

15 Q. And who was it before Mr. Hagen?

16 A. Can't recall his name. But the face.

17 Q. All right. Do you remember any second level managers
18 that you had in Metro?

19 A. One. But he's deceased.

20 Q. Do you recall who it was?

21 A. No, I can't think of his name.

22 Q. Who is your present Operations Manager?

23 A. Gary Dennis.

24 Q. Dennis?

25 A. Yes.

1 Q. Do you remember who your Operations Manager was when
2 you were in Metro?

3 A. No.

4 Q. Who is your present Shop Steward in the Union?

5 A. Don't know.

6 Q. Are you a member of the Union?

7 A. Yes, I am.

8 Q. Would you please tell me what your duties were as a
9 Maintenance Administrator in the Miami Metro center?

10 A. Analyzing troubles, separating.

11 Q. Is that all, just analyzing and separating?

12 A. Yes.

13 Q. Would you please tell me what you do when you analyze
14 a trouble?

15 A. We just separated them between residence, business,
16 coins.

17 Q. Did you ever work with out of service reports for
18 residence and business?

19 A. No.

20 Q. Can you tell me what an out of service report is?

21 A. Basically what it says, out of service.

22 Q. Can you tell me the criteria for determining when a
23 report is out of service?

24 A. No.

25 Q. When you analyze a trouble, do you analyze specific

1 individuals' troubles?

2 A. Yes.

3 Q. And what do you do when you analyze a trouble?

4 A. Determine what the customer is trying to tell me.

5 Q. Can you give me an example of that?

6 A. If a customer reports a trouble, determine if they are
7 having a complete problem on the line or if it's an individual
8 station trouble.

9 Q. And if it's a station trouble, is that a central
10 office type problem?

11 A. No.

12 Q. If it's a station trouble, is it an inside wire type
13 problem?

14 A. Can or can be (sic).

15 Q. And when you talk to the customer, do they indicate to
16 you whether their phone is completely out of service or if they
17 just have noise on the line, they can use it sometimes; or
18 is that part of the process?

19 A. Yes.

20 Q. When you've talked to the customer do you also do a
21 test on the line?

22 A. Yes.

23 Q. Does the test give you any indication as to whether
24 the person's line is out of service or not?

25 A. Not always.

1 Q. And if it doesn't give you an indication, what do you
2 do to finish your analyzation of the trouble?

3 A. Try to communicate with the customer.

4 Q. When you have finished your analyzation, are you
5 responsible for statusing that trouble as to whether or not it
6 was out of service, based on what the customer told you or the
7 test?

8 A. Based on the customer, yes.

9 Q. And do you place then a result code on the trouble
10 report itself to indicate what you found in your anylization?

11 A. Would you repeat it?

12 Q. Certainly. When you are working with a trouble report
13 are you working on a computer screen when you were in Miami
14 Metro?

15 A. No.

16 Q. Were you working on paper?

17 A. Yes.

18 Q. And when you were writing information on paper were
19 you required to write certain codes on that paper to indicate
20 what you'd found?

21 A. Well, I didn't write on the paper. Just separate.

22 Q. Okay. Can you explain to me a little further then how
23 you physically separated the troubles?

24 A. It's according to, like I said, business or residence.

25 Q. Were you given a stack of trouble reports on paper and

1 you would go through the stack and decide this was business and
2 then separate it to one side and this was residence and
3 separate it to the other; is that what you're telling me?

4 A. No. I would take it off the printer. It would
5 specify if it's business or residence.

6 Q. Were you given a stack of reports off a printer and
7 told to separate the business reports from the residence
8 reports?

9 A. No.

10 Q. Then I'm still not clear. Can you explain in further
11 detail what you mean by "separate"?

12 A. I would take it off the printer and separate it or go
13 through, and according to the code of "RES" or "BUS" it would
14 differentiate whether it's business or residence.

15 Q. And why would you separate, why would that function be
16 done?

17 A. Why would I separate them?

18 Q. Yes.

19 A. For testing, further investigation.

20 Q. And would you do the testing?

21 A. No.

22 Q. Who would do the testing?

23 A. Testers.

24 Q. Was that a position known as a Test Desk Man position?

25 A. Yes.

1 Q. Would you be responsible at all for closing those
2 reports out?

3 A. No.

4 Q. Would you be responsible at all for putting any
5 information on the paper of the report itself?

6 A. No.

7 Q. Have you ever worked as a Maintenance Administrator
8 working with a computer screen for trouble reports?

9 A. Yes.

10 Q. Was that also in Miami Metro?

11 A. No.

12 Q. Where was this?

13 A. Coral Gables.

14 Q. Can you give me an idea of approximately when you were
15 in Coral Gables?

16 A. No.

17 Q. Was it after Miami Metro?

18 A. No.

19 Q. It was before Miami Metro?

20 A. No. (Laughter). No.

21 Q. I'm sorry. I'm having a little trouble trying to pin
22 this down. Then let's see.

23 I think you indicated to me that you were in the Metro
24 doing paper tickets in the early '80s.

25 A. Yes.

1 Q. And then you switched to computer troubles when you
2 went to Coral Gables. Would Coral Gables be late '80s that you
3 were there?

4 A. Yes, yes.

5 Q. Do you remember any first level managers that you had
6 when you were in Coral Gables?

7 A. That's the one I have, Margaret.

8 Q. Oh, Kearse, she was also Coral Gables; okay.

9 Do you remember any second level managers while you
10 were in Coral Gables?

11 A. Are you talking about late?

12 Q. At any point in time while you were a Maintenance
13 Administrator in Coral Gables, do you recall any of the second
14 level managers that you had at that time?

15 A. Rick Hagen.

16 Q. Rick Hagen? Do you recall any others?

17 A. Yes.

18 Q. Do you remember their names?

19 A. No.

20 Q. Do you know who your Operations Manager was when you
21 were in Coral Gables?

22 A. Linda Eisenhower.

23 Q. What were your duties as an M.A. while you were in
24 Coral Gables?

25 A. Working with cable guys.

1 Q. Did you deal with trouble reports for cable?

2 A. Occasionally.

3 Q. Did you handle any trouble reports for single line
4 residence?

5 A. Occasionally, yes.

6 Q. Did you handle any trouble reports for single line
7 business?

8 A. Yes.

9 Q. During the time that you were in Coral Gables, did the
10 outside repairmen have craft access terminals, CATs?

11 A. What time are you speaking of?

12 Q. While you were an M.A. in Coral Gables.

13 A. Yes.

14 Q. While you were an M.A. in Coral Gables, did you status
15 reports at that point --

16 A. Yes.

17 Q. -- as to out of service or affecting service?

18 A. Yes.

19 Q. Did you also clear and close trouble reports when you
20 were in Coral Gables?

21 A. Yes.

22 Q. When you were statusing trouble reports as out of
23 service in Coral Gables, what criteria did you use to determine
24 if a report was out of service then?

25 A. The same as I told you earlier.

1 Q. At any point that you were statusing reports in Coral
2 Gables did any manager ever come to you and say "don't status
3 any out of services today"?

4 A. No.

5 Q. Did you ever receive any written instructions, instead
6 of verbal--

7 A. No.

8 Q. -- not to status any out of services?

9 A. No.

10 Q. Miss Minus, I'm going to show you a document now; and
11 this is titled Citizens Third Set of Interrogatories. An
12 interrogatory is a written question that I mailed to the
13 company, and the company mailed me a written answer.

14 And I asked the company to tell me the names of
15 employees who had knowledge about recording out of service
16 reports as affecting service on trouble report forms.

17
18
19
20 I'm going to show you this paper and give you a chance
21 to read it and discuss it with Mr. Alvarez, and then when
22 you're ready we'll go back on the record. Okay.

23 MS. RICHARDSON: Mr. Alvarez, I think I've told you
24 before about the confidentiality. That's why it's all
25 paperclipped.

1 (Thereupon the deposition was recessed briefly
2 and was thereafter resumed, with the agreement of the
3 witness and all parties present)
4
5
6

7 Q. What information can you give me about instructions
8 not to status out of service reports?

9 A. What--

10 MR. BEATTY: Is that question other than what she has
11 already testified to?

12 Q. (BY MS. RICHARDSON): Other than what you've already
13 testified to, what other information do you have about not
14 statusing out of service reports?

15 A. No additional.

16 Q. All right. I'm going to show you another document.
17 And this one is Southern Bell's Response To Preliminary Order
18 number PSC 93-0263 PCO-TL entered on February 19, 1993. This
19 was filed by Southern Bell in the consolidated rate case docket
20 in front of the Public Service Commission on April 1st, 1993.
21 And there's a Kathleen Minus, number 407.

22 Have you seen this document, Miss Minus?

23 A. Yes.

24 Q. Do you need any time off the record before we
25 continue?

1 A. No.

2 Q. By your name appears a couple of numbers. One of them
3 we've already talked about. The other one is number eleven.
4 And number eleven indicates that you may have some information
5 about improper preparation of trouble reports.

6 What information do you have about that?

7 MR. ALVAREZ: If any?

8 THE WITNESS: When you're saying "improper," what are
9 you referring to?

10 Q. (BY MS. RICHARDSON): Let me digress for a minute then
11 and discuss some other things.

12 A. All right.

13 Q. Are you familiar with the no access code?

14 A. Yes.

15 Q. Can you briefly tell me what a no access code is?

16 A. States that the customer was not present or not
17 available for service to be rendered.

18 Q. Are you aware of the company requirement that out of
19 service reports be cleared within 24 hours?

20 A. Am I aware?

21 Q. Yes, ma'am.

22 A. Yes.

23 Q. Have you always known that?

24 A. No.

25 Q. When did you find out about that?

1 A. I don't know a date or time, but when I got involved,
2 as a screener.

3 Q. As a Maintenance Administrator?

4 A. Screener, yes.

5 Q. Screener. All right.

6 Are you aware that the Public Service Commission
7 requires the company to complete at least 95 percent of its out
8 of service reports within 24 hours?

9 A. Am I? No, I wasn't.

10 Q. Do you know if the Public Service Commission requires
11 the company to repair at least 95 percent of the out of service
12 reports it receives within 24 hours?

13 A. Yes.

14 Q. Do you know if the customer is due a rebate if they're
15 out of service more than 24 hours?

16 A. Yes.

17 Q. Do you know of anyone who has no accessed a trouble
18 report before it was dispatched?

19 A. No.

20 Q. Do you know of anyone who has no accessed a trouble
21 report when access was available?

22 A. No.

23 Q. Do you know whether that no access code stops that
24 24-hour repair clock?

25 A. Yes.

1 Q. Do you know of anyone who has no accessed out of
2 service reports just to stop the 24-hour repair clock?

3 A. No.

4 Q. Do you know what the CON Code is, a C. O N, Carried
5 Over No Code?

6 A. Can you explain?

7 Q. Have you ever used that code?

8 A. No.

9 Q. Do you know what a future date request is?

10 A. Yes.

11 Q. Does it have a certain code that you use when you are
12 coding reports on a future date request?

13 A. Yes.

14 Q. And can you tell me what that code is?

15 A. Well, it's not a -- we just used "NAO."

16 Q. "NAO"?

17 A. (Nods yes)

18 Q. Have you always used the NAO for the future date
19 request?

20 A. Yes.

21 Q. Do you know if the NAO code stops the 24-hour repair
22 clock on the report?

23 A. Yes.

24 Q. Do you know of anyone who has used that NAO code on an
25 out of service report to stop the repair clock?

1 A. No.

2 Q. Do you know of anyone who has used the NAO code on
3 anything other than a future date request?

4 A. No.

5 Q. When you clear and close reports do you input certain
6 disposition and cause codes on those reports?

7 A. Yes.

8 Q. When you were working in Coral Gables, can you tell me
9 essentially what the disposition code stood for?

10 A. It gives you the information of exactly what was
11 either done or what was the problem.

12 Q. And can you give me an example of a disposition code?

13 A. For an instance?

14 Q. Yes. Would inside wire be a disposition code?

15 A. Well, I'm not familiar with the codes for outside.

16 Q. What is a disposition code that you have used?

17 A. Test Okay.

18 Q. All right. And when you have a test okay report, does
19 that mean that there's not trouble on the line at the point
20 it's testing okay?

21 A. Customer calls back and advises that everything is
22 clear.

23 Q. On test okay reports where you've talked to the
24 customer and the line is clear, is it proper to status that
25 report and close out as out of service?

1 A. No.

2 Q. Have you ever heard of that being done?

3 A. No.

4 Q. Has anyone ever asked you to take test okay reports
5 and close them out as out of service?

6 A. No.

7 Q. Has anyone ever asked you to take affecting service
8 reports and close them out as out of service?

9 A. No.

10 Q. Have you ever heard of that being done?

11 A. No.

12 Q. Can you briefly tell me what a cause code is?

13 A. It's a code that's used or signifying what the problem
14 or what the cause affecting service or what was the reason the
15 problem was there.

16 Q. Can you give me an example of a cause code?

17 A. Unknown.

18 Q. All right. Are there certain cause codes for weather
19 problems?

20 A. Yes.

21 Q. Are there cause codes when the damage was caused by
22 the customer himself?

23 A. Yes.

24 Q. Are there cause codes when the damage was caused by
25 another telephone employee?

1 A. Yes.

2 Q. Do you know if there are any disposition and cause
3 codes that can be placed on a report that would keep that
4 report from being counted against the company as a miss if the
5 out of service went over 24 hours?

6 A. No.

7 Q. Do you know of anyone who has directed you to use
8 disposition or cause codes that you felt did not apply to the
9 condition?

10 A. No.

11 Q. Have you ever heard of that being done?

12 A. No.

13 Q. Do you know of anyone who has used the tornado code
14 for all reports in a given area, whether the out of service was
15 caused by the tornado damage or not?

16 A. No.

17 Q. Do you know how to exclude a trouble report?

18 A. Yes.

19 Q. And how is that done?

20 A. If a customer reports a trouble, it was cleared, and
21 someone else within the office reports it a second time, not
22 knowledge of it being cleared.

23 Q. Is it proper to exclude an out of service report other
24 than under the condition you've just told me?

25 A. No.

1 Q. Have you ever heard of anyone excluding out of service
2 reports?

3 A. No.

4 Q. Has anyone ever asked you to do that?

5 A. No.

6 Q. Do you know of any managers who have cleared and
7 closed troubles on their own?

8 A. No.

9 Q. Do you know of any manager that has required you to
10 contact them before closing out an out of service over 24-hour
11 report?

12 A. No.

13 Q. Do you know of anyone who has asked you to back up the
14 clearing time on the trouble report?

15 A. No.

16 Q. Have you ever heard of that being done?

17 A. Perhaps. No.

18 Q. Do you know of anyone who has backed up a clearing
19 time --

20 A. No.

21 Q. -- on a trouble report?

22 Do you know what an employee-originated report is?

23 A. Yes.

24 Q. Would you please explain what that is?

25 A. I make up a report-- Well, I can only speak for

1 myself.

2 I make them up. If I'm not able to give service to a
3 customer or new service, then I make up an employee report.
4 Not a trouble, but to clear facilities so they can have
5 service.

6 Q. Okay. Let me ask you an example then.

7 If there is a service technician working outside on a
8 particular trouble, and another customer sees that ST outside
9 and comes up and says "My phone is dead, would you please call
10 in a report," and the employee does, is that an employee
11 report?

12 A. If who calls it in?

13 Q. If the employee calls it in for the customer.

14 A. I haven't seen them come up as an employee report.

15 Q. Do you know of any situations where out of service
16 reports that have been about to go out over 24 were closed,
17 reopened as a employee reports-- Let me start over.

18 Do you know of any instances where an out of service
19 report that was about to go over 24 hours was closed and then
20 reopened as an employee report in order to clear the problem
21 and close it?

22 A. No, I don't.

23 Q. Have you heard of that being done?

24 A. No.

25 Q. Do you know of anyone using someone else's employee

1 code on trouble reports?

2 A. No.

3 Q. Has anyone ever used your code?

4 A. No.

5 Q. Do you know of anyone who has put false information on
6 an employee report?

7 A. No.

8 Q. Now I want to go back to the document number eleven,
9 improper preparation of trouble reports.

10 Do you know of any instances where trouble reports
11 were improperly stated?

12 A. No.

13 Q. Do you know of any instances where the times on
14 trouble reports were improperly reported?

15 A. No.

16 Q. Do you know of any instances where the codes on a
17 trouble report were improperly coded?

18 A. No.

19 Q. Do you know of any other improper activities in
20 handling trouble reports?

21 A. No.

22 Q. Have you ever been disciplined, Miss Minus, for your
23 handling of customer trouble records?

24 A. No.

25 Q. Have you ever had occasion to file a grievance?

1 A. Never.

2 Q. Have you ever felt pressured by any of your managers
3 to handle reports in a manner that you felt might be
4 questionable?

5 A. No.

6 Q. Has anyone ever asked you to help sell products or
7 services for the company?

8 A. Yes.

9 Q. Would you please tell me about that?

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

11 It's ambiguous.

12 MS. RICHARDSON: You can still answer.

13 A. Something I did on my own.

14 Q. (BY MS. RICHARDSON): All right. Did anyone ask you
15 to do this on your own?

16 A. In between times.

17 Q. In between which times?

18 A. If I'm dealing with a customer.

19 Q. On a trouble report, you mean?

20 A. Yes.

21 Q. All right. And then how would you help with the sale?

22 A. Contact the business office and bridge the customer.

23 Q. Would you have a set of questions that you would ask
24 the customer about whether or not they would want a specific
25 feature or service?

1 A. No. I let the Service Rep ask the customer.

2 Q. Did you ever initiate questions of the customer that
3 might indicate you could help them with obtaining a particular
4 feature or service?

5 A. Only if they allow me to get the Service Rep.

6 Q. All right. Did you ever actually help with a sale
7 then to a customer of a product or service?

8 A. Yes.

9 Q. Were you eligible for any prizes or awards?

10 A. Yes.

11 Q. Did you win anything?

12 A. Yes.

13 Q. What did you get?

14 A. A small TV.

15 Q. A TV?

16 A. Yes.

17 Q. Is that the only thing you won?

18 A. Yes.

19 Q. Did you get any training for the specific sales part
20 of these contacts?

21 A. No.

22 Q. Did anyone ever ask you to keep track of the amount of
23 time you spent on sales as opposed to the amount of time you
24 were working with customer trouble?

25 A. No.

1 Q. Were you ever given a list of customers to call to
2 find out if they wanted to add say wire maintenance or some
3 other feature?

4 A. No.

5 Q. Were you given a list of products and services with
6 prices so that you could discuss those?

7 A. No.

8 Q. Do you know if any of the customers to whom you helped
9 or assisted with sales, do you know if any of those customers
10 complained later that they were being billed for services that
11 they had not ordered?

12 A. No.

13 Q. Did you ever give a statement to the company regarding
14 the sales that you made?

15 A. No.

16 Q. Do you know of anyone who recorded a sale of a service
17 to a customer that the customer did not order?

18 A. No.

19 Q. Were you ever asked to sit in a separate room to
20 conduct nothing but sales on any particular day?

21 A. No.

22 MS. RICHARDSON: Miss Minus, I want to thank you for
23 your time. I appreciate your being here. I think that's
24 all the questions I have, but-- No?

25 MR. PIERSON: No questions.

1 MR. BEATTY: That's it.

2 (Thereupon the deposition was concluded at 11:32 a.m.)

3
4
5
6 _____
7 (Date)

_____ Kathleen Minus

8 Sworn to and subscribed before me this _____ day of

9 _____, 1993.

10
11 _____
12 Notary Public
13 State of Florida At Large

14 My Notary Commission Expires:

15 December 21, 1993

1 STATE OF FLORIDA)
 : ss. CERTIFICATE OF REPORTER
 2 COUNTY OF DADE)

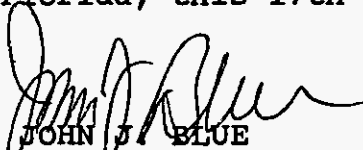
3 I, JOHN J. BLUE, Registered Professional
 Reporter, Certified Shorthand Reporter and Notary Public
 4 in and for the State of Florida at Large,

5 DO HEREBY CERTIFY that the deposition of
 KATHLEEN MINUS, a witness called by the Citizens of the
 6 State of Florida in the above-captioned matter, Docket
 No. 910163-TL, was heard at the time and place herein
 7 stated; that the witness was by me first sworn to tell
 the truth; it is further

8 CERTIFIED I reported in shorthand the said
 9 deposition; that the same has been transcribed under my
 direct supervision, and that this transcript, consisting
 10 of 32 pages, constitutes a true and accurate
 transcription of my notes of said deposition; it is
 11 further

12 CERTIFIED that I am neither of counsel nor
 related to the parties in said cause and have no
 13 interest, financial or otherwise, in the outcome of this
 docket.

14 IN WITNESS WHEREOF, I have hereunto set my hand
 15 at Miami, Dade County, Florida, this 17th day of August,
 1993.

16 
 JOHN J. BLUE

17 Registered Professional Reporter
 18 Certified Shorthand Reporter and
 Notary Public

19 In and for the State of Florida At Large
 Suite 1014, Ingraham Building
 20 25 Southeast 2nd Avenue
 Miami, Florida 33131
 21 (305) 371-6228

22
 23 My Notary Commission Expires:

24 December 21, 1993
 25

REPORTERS DEPOSITION CERTIFICATE WITH ACKNOWLEDGMENT

STATE OF FLORIDA)
: ss.
COUNTY OF DADE)

I, JOHN J. BLUE, Registered Professional Reporter, certify that I was authorized to and did stenographically report the foregoing deposition and that the transcript is a true record of the testimony given by the witness.

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

Dated this 17th day of August, 1993.

John J. Blue
JOHN J. BLUE

Registered Professional Reporter

STATE OF FLORIDA
COUNTY OF DADE

The foregoing certificate was acknowledged before me this 17th day of August, 1993 by JOHN J. BLUE, who is personally known to me.

Amar Kredi

Amar Kredi
Notary Public - State of Florida
My Commission No. CC194782
Expires: May 16, 1996

