BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION IN RE: Petition on behalf of CITIZENS) OF THE STATE OF FLORIDA to Initiate

OF THE STATE OF FLORIDA to Initiate Investigation into Integrity of SOUTHERN BELL TELEPHONE & TELEGRAPH COMPANY'S Repair Service Activities and Reports.

DOCKET NO. 910163-TL

COPY

DEPOSITION OF: SANDRA TERRY

TAKEN AT THE INSTANCE OF:

Citizens of the State of Florida, by and through Jack Shreve, Office of

Public Counsel

13 DATE: Wednesday, July 29, 1992

14 TIME: Commenced at 10:35 a.m. Concluded at 11:10 a.m.

PLACE: 666 N.W. 79th Avenue Room 642

Miami, Florida

REPORTED BY: JANE FAUROT

Notary Public in and for the State of Florida at Large

State of Florida at Large

19

ACCURATE STENOTYPE REPORTERS, INC. 100 SALEM COURT TALLAHASSEE, FLORIDA 32301

(904) 878-2221

24

4

5

6

7

8

9

10

11

12

15

16

17

18

20

21

22

23

1	APPEARANCES:
2	REPRESENTING THE SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:
. 3	HARRIS R. ANTHONY, ESQUIRE
4	BellSouth Telecommunications, Inc. d/b/a Southern Bell Telephone &
5	Telegraph Company c/o Marshall M. Criser, III
6	150 South Monroe Street, Suite 400 Tallahassee, Florida 32301
7	REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:
8	SUE RICHARDSON, ESQUIRE
ا و	Office of Public Counsel
	c/o The Florida Legislature
10	111 West Madison Street Room 812
11	Tallahassee, Florida 32399-1400
12	REPRESENTING THE FLORIDA PUBLIC SERVICE COMMISSION:
13	
١, ١	JEAN WILSON, ESQUIRE and STAN GREER, Class B Practitioner
14	FPSC Division of Legal Services
15	Florida Public Service Commission
	101 East Gaines Street
16	Tallahassee, Florida 32399-0863
17	REPRESENTING SANDRA TERRY:
18	VICTOR P. DeBIANCHI, JR., ESQUIRE Center Court Building
19	Suite 300
20	2450 Hollywood Boulevard Hollywood, Florida 33020
21	ALSO PRESENT:
22	WALTER BAER, Office of Public Counsel.
23	CARL VINSON, FPSC Division of Communications.
24	* * * * *
25	

		3
1	INDEX	
2	WITNESS:	D1.07
3	SANDRA TERRY	PAGE NO.
4	Direct Examination by Ms. Richardson Cross Examination by Mr. Greer Cross Examination by Mr. Vinson	6 31
5	Cross Examination by Mr. Vinson	32
6	·	
7	CERTIFICATE OF REPORTER	33
8		•
9		
10		
11		
12		
13		
14	·	
15		•
16		
17		
18		
19		
]		
20		
21		
22	•	•
23		
24		
25		

STIPULATIONS

The following deposition of SANDRA TERRY was taken on oral examination, pursuant to notice, for purposes of discovery, for use in evidence, and for such other uses and purposes as may be permitted by the Florida Rules of Civil Procedure and other applicable law. Reading and signing of said deposition by the witness is not waived. All objections, except as to the form of the question, are reserved until final hearing in this cause; and notice of filing is waived.

* * * * * *

Thereupon,

SANDRA TERRY

was called as a witness, having been first duly sworn, was examined and testified as follows:

MR. ANTHONY: Okay. Ms. Terry, we'll use the same stipulations as before. I assume that's acceptable with everybody.

There is one other thing I want to add, Ms. Terry.

These depositions are being taken pursuant to an investigation being conducted by the Public Service

Commission into questions about Southern Bell's trouble reporting practices.

As you may be aware, Southern Bell did its own internal investigation of related matters. That

investigation, I should add, was done at the request and under the guidance of the Legal Department and is privileged, which means that things that happened in that investigation cannot be disclosed to third parties. As a consequence, to the extent that any of the guestions that you're asked today ask you for your knowledge about that investigation, your participation in it, or ask you what you've heard about the investigation, I may instruct you not to answer the question, because it is privileged, and it is not To the extent, though, that you subject to discovery. have any knowledge that's responsive to the questions that's derived from anything other than that investigation, then, of course, you're free to answer, and you should do so fully and honestly, unless there is some other objection that I or your attorney may interpose. Is that relatively understandable?

THE WITNESS: Yes.

MR. ANTHONY: Okay. Thanks.

MR. DeBIANCHI: And when you answer the questions make sure you say "yes" or "no" and don't nod or shake your head, because the court reporter won't be able to pick it up.

THE WITNESS: Okay.

MS. RICHARDSON: All right. I have just a few

25

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

little preliminaries also. And they deal with use of common -- a couple of common terms, so that if you use them we both are understanding what you're saying.

THE WITNESS: Okay.

MS. RICHARDSON: Okay. The first one is "I don't know," all right. If you tell me that you don't know, that means that you have no personal direct knowledge, nor have you heard anything by rumor, reading the newspaper or from any other source. Is that acceptable? Is that okay for you?

THE WITNESS: Okay.

MS. RICHARDSON: All right. Then the other one is "I can't remember" or "I can't recall," that means you drew an absolute blank. If there are any little fragments out here, then I would like for you to say, "Well, I can't remember, but there is something, okay, and I can't put my finger on it; but there is a little something out here that I may have heard." And that will give me an opportunity to ask maybe some further question and bring it clearer to your mind. Okay. Is that acceptable?

THE WITNESS: Yes.

DIRECT EXAMINATION

BY MS. RICHARDSON:

Q All right. Then we will start by asking you to

```
1
     state your full name and spell it for the record, please.
 2
               Sandra Terry, S-A-N-D-R-A, T-E-R-R-Y.
 3
          Q
               And your address, please?
 4
          Α
               Home?
               Uh-huh.
 5
          Q
 6
 7
          Q
               And you commute every day?
 8
          Α
               Yes, it is not that far.
 9
               What is your present position?
          Q
10
               With the Company, assistant administrator.
          Α
11
               In an IMC?
          Q
               No, in a major account center.
12
          Α
13
               Major account center.
          Q
14
          Α
               Right.
15
          Q
               And is there just one major account center for
     Miami?
16
17
               For South Florida.
          Α
18
               And does that includes Fort Lauderdale, as well?
          Q
19
          Α
                    There is one for southeast, also. I'm in the
               No.
20
     one for South Florida.
21
          Q
               All right. And that is for Miami and the Keys?
22
          A
               Yes.
23
          Q
               That is the extent from one end to the other?
          Α
               Yes.
24
               And who is your immediate supervisor?
25
          Q
```

1	A	Fred Stallworth.
2	Q	Two Ls?
3	A	Yes, S-T-A-L-L-W-O-R-T-H.
4	Q	And who is his immediate supervisor?
5	A	Linda Isenhour.
6	Q	Okay. And what is your present pay grade?
7	A	Four.
8	Q	You're a Pay Grade 4?
9	A	Uh-huh.
10	· Q	How long have you held this position?
11	A	Where I'm at now?
12	Q	Uh-huh, systems administrator, I believe you said.
13	A	Well, I have been one now since November.
14	Q	Of '91?
15	A	Of '91.
16	Q	'91. And what did you do before that?
17	A	Systems administrator.
18	Q	For the MAC?
19	A	No, for the IMC, local maintenance center.
20	Q	And which one was that?
21	A	Metro, Miami Metro.
22	Q	Why did you move from that particular position to
23	your pres	ent position?
24	A	They closed my office.
25	Q	Were your duties as a systems administrator in the

IMC the same duties that you're performing now for the MAC? 1 2 Α Basically. And what is the scope of those duties? 3 4 I maintain computer systems in the center and applications. 5 Okay. For a layperson -- I'm sure that says a lot 6 Q for you, but for a layperson that doesn't do much for me. 7 8 Can you clarify or explain a little bit more in detail? Well, how can I explain this one? Everybody has a 9 computer, and they have different applications that go into 10 11 the different computer boxes. If one of the applications go down, they call me. If something happens to their computer, 12 13 they call me. 14 So, is an application software? 15 Yes, basically. Α Is that what it amounts to? Would that be like 16 Q 17 LMOS? Yes, LMOS, CIMAP, SARTS, M-A-C-S. 18 Okay. CIMAP is C-I-M-A-P? 19 0 20 Yes. Α And SARTS is S-A-R-T-S. 21 Q 22 Α Yes. Would it include MTAS? 23 Q I don't remember the name. It's similar to 24 A 25 MTAS, but it's not MTAS.

1 0 TREAT? 2 No. 3 Would it include any of the billing, customer 4 billing type information? 5 Α No. Okay. Generically, then, in terms of the types of 6 7 software that you deal with, applications that you deal 8 with, do any of those, really your part of it, deal with customer trouble report handling? 9 10 Α No. So, then, if I'm understanding you, what your 11 12 position requires you to do is to make sure that the employees who are dealing with LMOS and these other systems, 13 14 their actual computer screen comes up and they actually are able to type into the program, that the software is 15 16 available? 17 Α Right. And that is what you do? 18 19 Yes. Α 20 Prior to that in your position in the IMC as a 21 systems administrator, what were what your duties there? 22 Α The same. You dealt with CIMAP and SARTS? 23 0 24 Α Not SARTS, but CIMAP.

And LMOS?

Q

	ļ	
1	. А	And LMOS.
2	Q	Did you deal with MTAS in that position?
3	A	It was no. It was there, but it wasn't a
4	system tha	at I would keep up, no.
5	Ω	Did you deal with the AUTOSCREENER rules?
6	A	Yes.
7	Q	Was one of your responsibilities maintaining the
8	AUTOSCREE	NER rules?
9	A	Yes.
10	Q	Is that also your present responsibility?
11	A	No.
12	Q	How long did you hold your position in the IMC as
13	a systems	administrator?
14	A	Maybe three years, approximately three years.
15	Q	So, you were there from what, '85 to '88, '88 to
16	191?	
17	A	I don't remember.
18	Q	You don't remember?
19	A	I don't remember.
20	Q	And what was your entry position with the Company?
21	A	Construction clerk.
22	Q	Construction clerk?
23	A	Construction clerk.
24	Q	And when was that?
25	A	1973.

1	Q So, you have been with the Company quite awhile?
2	A Yes.
3	Q All right. Did you hold any other positions with
4	the Company from 1973 up until these past two that dealt
5	with customer trouble report handling?
6	A I was an assistant manager in the maintenance
7	center.
8	Q Which maintenance center?
9	A Metro.
.0	Q The Metro Maintenance Center?
.1	A Uh-huh.
.2	Q Was that right before you became the systems
.3	administrator?
.4	A Yes.
.5	Q All right. So, how long were you in the Metro
.6	center?
.7	A Approximately five years.
18	Q About five years, okay. Okay. So, we are
.9	speaking of maybe '86, 1986 to 1991, roughly, time frame?
20	A Yes.
21	Q Okay. Are you familiar with customer trouble
22	report handling? How a customer trouble report comes into a
23	center, and the dispatch and cause codes, and the clearing
24	and closing of customer trouble reports?
25	A How many questions was that?

1	Q I'm sorry. That's fine. Are you familiar with
2	the customer trouble report process?
3	A Yes.
4	Q All right. Are you familiar with opening a
5	customer trouble report?
6	A No.
7	Q Are you familiar with statusing, the intermediate
8	statusing on a customer trouble report?
9	A No.
LO	Q Are you familiar with clearing procedures for a
1	customer trouble report?
.2	A No.
١3	Q Are you familiar with closing procedures for a
4	customer trouble report?
.5	A No.
L6	Q Okay. In your earlier position in the IMC, before
L7	you were systems administrator, what responsibilities or
18	duties did you have in the customer trouble report process?
19	A I was the cable control supervisor. I handled
20	I was in charge of detecting if the cable failure was coming
21	in on multiples, multiple group of troubles within the same
22	cable.
23	Q All right. And how did you go about detecting
24	that?
25	A We had a system. We did it through LMOS.

1 Q Okay. So, it came off on a report or something? 2 Α Uh-huh. 3 Were these individual customer trouble reports or 0 4 was there --5 I don't understand the question. 6 When you determined that there was some cable, you were looking at the cable reports, were these individual 7 customer trouble history reports that were coming up or was 8 9 there a separate report saying, "We have ten cable failures 10 here and they are all tied into whatever pair or whatever 11 number"? 12 Α No, they were individual reports and you had to . 13 look at them to see if they were related. And how could you determine if they were related? 14 0 15 By the test. Α 16 Are you familiar with bulk statusing of cable 17 failures, individual customer reports that are attached to cable failures? 18 19 Bulk statusing, no. 20 Q Are you familiar with TRACKER? 21 A TRACKER? 22 The TRACKER program, the software program? 23 A No. 24 Then the extent of your duties as cable repair 25 foreman was simply to look at a customer report, decide if

it was a cable failure, and then code it properly? 1 2 Α No. 3 Okay. Then I still don't quite have a handle on, Q 4 obviously, exactly what you did? 5 Α I had to detect if there was a failure. I had to 6 get somebody dispatched on it. 7 And that is the extent? 8 Α And then make sure that -- and then get it closed 9 out. 10 Q Okay. So, making sure that it was closed out. How did you make sure it was closed out? 11 12 Α Well, the cable repairman would call in and say 13 that it was to one of the girls, and have them test it. And they would test it, and they would call the customers. 14 15 they would -- then the cable repairman would tell them what 16 they did and give them the codes, and they close it out. Okay. And did you supervise that process? 17 Α 18 Kind of, yes. 19 How did the cable repairman know what codes to use 0 20 on closeout? 21 Α They had a ticket book or something they carried around that told them. 22 23 And were those codes just sort of standard codes, 24 or did they change from time to time? 25 Α No, they changed, depending on what they found and

1 what they did. 2 Okay. Was it possible at that time to take a 3 group of cable failures that were on the same cable or group of customer troubles that were linked to the same cable and 4 put them all together and have one repairman go out and work 5 on all of those at the same time? 6 That's usually what they did. Is that considered bulk processing of cable 8 repairs, bulk statusing and processing? 9 I don't know. 10 Α You don't know. When they were all fixed at one 11 time, do you know if they were all closed at one time? 12 We didn't close anything until every customer was 13 Α contacted and made sure that, yes, in fact, they were in 14 15 service. So, they might have been closed at different 16 0 17 times? It's possible. Α 18 19 20 21 22 23 24 25

1 2 Α Yes. 3 4 5 Do you know which code? Q 6 It was a CON code. 7 The CON code. Did you ever use the CON code Q yourself? 8 Α No. 10 Did you ever direct anyone else to use the CON 0 11 code? 12 No. 13 Do you know of anyone who directed employees to 14 use CON codes? 15 A No. Have you, or do you know of any other employees 16 Q 17 who misused the CON code? 18 No. Α 19 20 any other employees misusing the CON code? 21 Α No. 22 23 I don't understand the question. A 24 25

1		•
2	Q	Uh-huh.
3	A	My operations manager and Hilda Geer.
4	Q	And who was your operations manager at that point?
5	A	Fred Stallworth.
6	Q	There was no one else present?
7	A	No.
8		
9		
10		
11		
12		
13		·
14		
15		
16		?
17		
18		
19		
20		
21		
22		
23		
24		
25	A	No.

```
1
 2
3
               No.
          Α
               Why not?
 5
               I just don't.
          A
 6
7
8
9
10
11
12
               I don't know.
13
     then?
14
15
          Α
               No.
16
          Q
               Why not?
               I just -- I don't know. I just forgot about it.
17
          A
               Did anyone accuse you of falsifying customer
18
          Q
     trouble reports?
19
20
          Α
               No.
               Have you ever accused anyone else of falsifying
21
          Q
22
     trouble reports?
               No.
23
          Α
               Have you heard of anyone being accused of
24
     falsifying trouble reports?
25
```

1	A	No.
2	Q	Have you heard the terms, "backing up time" in
3	reference	to handling customer trouble reports?
4	A	No.
5	Q	You have never heard those terms used?
6	A	No.
7	Q	Have you ever heard of anyone backing up the time
8	on a custo	omer trouble report to meet the out-of-service
9	index base	e, keep an out-of-service report from going over 24
10	hours?	·
11	A	No.
12	Q	Do you know if anyone has ever done that?
13	A	No.
14	Q	And have you ever done it?
15	A	No.
16	Q	Do you know of any procedure in an IMC where
17	maintenand	ce administrators were directed to call a manager
18	to receive	e disposition and cause codes before closing out an
19	out-of-se	rvice report?
20	A	No.
21	Q	Have you ever heard of that being done?
22	A	No.
23	Q	Have you ever done that yourself?
24	A	No.
25	Q	As cable dispatcher, were your cable repairmen

1 permitted to close reports out themselves? 2 No. 3 0 Did they have to call into the center to have that 4 done? 5 Α Yes. 6 Q And did they ever have to call a manager to have that done? 7 8 Α No. 9 Q They talked to whom? 10 Α An MA. 11 Q An MA. Do you know of anyone who has miscoded a 12 cable failure or a cable report? 13 Α No. Are you aware of exclusion codes that would keep 14 15 an out-of-service report from being counted in that repair 16 index base, meeting the 95 percent repair within 24 hours base? 17 18 Α No. 19 You don't know any disposition codes that would 20 keep a report out of that? 21 Α No. 22 Are you familiar with the multiple cable failure Q 23 code? 24 I don't remember it. A 25 Are you familiar with a no access code? Q

```
1
          Α
                You mean the NAS code?
 2
                Uh-huh.
          Q
 3
          Α
                Yes.
 4
          Q
                You know that one?
 5
          A
                Uh-huh.
 б
                Okay. Do you know of anybody who has used the no
          Q
 7
     access code to stop the repair clock on a customer trouble
 8
     report?
 9
          Α
                No.
10
          Q
               Have you ever heard of that being done?
11
          Α
               No.
12
          Q
               Have you ever done that yourself?
13
          Α
               No.
14
               Do you know if it's possible to exclude an
          Q
15
     out-of-service report on the system?
          A
16
               No.
17
               You don't know whether it's possible to do that?
          0
18
          Α
               (Witness indicating no.)
19
               Do you know what an exclude is?
          Q
20
          A
               No.
21
22
     supervised her?
23
               She was station control.
24
          Q
               And was part of her duties handling customer
25
     trouble repair reports?
```

1 I don't know what you're talking about. Α You were her supervisor, correct? 2 Q 3 Α Yes. All right. In your supervision of her, was part 4 of your duties overseeing her work and making sure that she 5 did it properly? б 7 Α No. All right. In what respect, then, were you her 8 Q 9 supervisor? I was her supervisor because my supervisor was in 10 Α 11 the hospital. 12 Q So, this was a temporary supervision? Right. 13 Α For what period of time? 14 Q Maybe three months. 15 Α So, you filled in? 16 Q Right. 17 A Were you given any training for filling in in that 18 Q 19 position? 20 A No. Did you have an option to receive training if you 21 had requested it as taking on that position? 22 No. 23 Α Did you have an option of rejecting that 24 supervisory responsibility and just sticking with whatever 25

```
1
     else it was that you were doing?
 2
          Α
               I don't know.
 3
          Q
               You were just told to do it, and you just did it?
          Α
               Right.
 4
 5
               I don't remember exactly.
 6
          Α
               Was it this year?
 7
          Q
          Α
               Yes.
 8
 9
10
11
12
          Α
               Correct.
13
14
          Α
               No.
15
16
               No.
          Α
17
18
          Α
               I just don't want to.
19
20
21
               No:
          Α
               Do you know of anyone who has excluded an
22
23
     out-of-service report to keep it from going over 24 hours
     and then reopen the report in order to clear and close it?
24
          A
               No.
25
```

	1	
1	Q	Have you ever done that yourself?
2	A	No.
· 3	Q	Have you ever heard of it being done?
4	A	No.
5	Q	Do you know of anyone who has recorded an
6	extension	of time in order to keep from missing a commitment
7	on a repor	rt?
8	A	No.
9	Q	Have you ever done that yourself?
10	, A	No.
11	Q	Have you ever heard of that being done?
12	A	No.
13	Q	Are you familiar with the CON code?
14	A	No, not really.
15	Q	Do you know what it means?
16	A	I don't remember what it means.
17	Q	Is it carryover no?
18	A	I don't know if that is for sure or not.
19	Q	All right. Do you know what function it has on a
20	customer t	trouble report?
21	A	No.
22	Q	Do you know of anyone who has taken test okay
23	reports an	nd statused them as out-of-service?
24	A	No.
25	Q	Have you ever done that yourself?

1	А	No.
2	Q	Have you ever heard of anybody doing that?
3	А	No.
4	Q	Are you familiar with the operational review that
5	was conduc	cted in the summer of 1990 in this area, in the
6	Miami area	a?
7	A	I don't remember.
8	Q	Did you possibly know something about it at one
9	time, but	you just don't remember it right now?
10	A	It's possible.
11	Ω	Does it ring any faint bells or you're just saying
12	you're an	absolute blank?
13	A	No, blank.
14	Q	Okay. Do you know of anyone who has violated
15	Company pr	rocedures in terms of customer trouble repair
16	report pro	ocessing?
17	A	No.
18	Q	Have you ever, yourself, violated Company
19	procedure	for handling customer trouble reports?
20	A	No.
21	Q	For handling cable?
22	A	No.
23	Q	Have you ever heard of anybody doing that?
24	A	No.
25	Q	Have you ever heard of anyone using a dummy

1	employee code instead of their own employee code for
2	statusing?
3	A No.
4	Q Have you ever done that yourself?
5	A No.
6	Q Do you know of anyone who has done that?
7	A No.
8	Q Do you know of anybody who has ever used an
9	unassigned employee code to status a trouble report?
10	A No.
11	Q Have you ever done that yourself?
12	A No.
13	Q Have ever heard of that being done?
14	A No.
15	Q Do you know of anybody who has used someone else's
16	employee code to status a trouble report?
17	A No.
18	Q Have you ever done that yourself?
19	A No.
20	Q Have you ever heard of that being done?
21	A No.
22	Q Do you know what it means to build the base, the
23	out-of-service base to meet the 95 percent index?
24	A No.
25	Q All right. Do you know what the 95 percent index

1 is, to meet? 2 Α I don't remember. You don't remember. Are you aware that the 3 4 Company has a policy and the PSC has a rule that requires 5 the Company to clear out-of-service reports within 24 hours 6 and must clear at least 95 percent of those reports within 7 24 hours? 8 Α I knew there was a rule. 9 So, you knew that? You're aware of that? Q 10 Α Yes. 11 All right. Do you know of anyone who was in Q 12 danger of missing that 95 percent index who may have added some more out-of-service reports to the pool in order to 13 14 meet that 95 percent index? Α No. 15 Have you ever heard of that being done? 16 17 Α No. 18 Do you know of anyone who has taken affecting

21 A No.

the base?

19

20

- Q Have you ever heard of that being done?
- 23 A No.
- Q Have you ever done that yourself?
- 25 A No.

service reports and statused them as out-of-service to build

1 Q Do you know anyone who has improperly excluded a 2 customer trouble report? No. 3 Α Do you know what excluding a report is? 4 0 5 Α No. Do you know of anybody who has falsified a 6 Q customer repair record? 7 No. 8 Α 9 Have you ever done so yourself? Q 10 Α No. Have you ever heard of anybody doing so from any 11 source, newspaper, other employees, outside rumor, gossip 12 13 any source? I don't listen to rumor or gossip, no. Α 14 Do you know if a customer is due a refund or a 15 16 rebate if his phone is out-of-service over 24 hours? You mean should they get one? 17 Α 18 Q Yes. 19 Α Yes. Okay. Do you know of anyone who has taken any 20 action whatsoever with a customer trouble report that has 21 prevented a customer from getting a rebate that he or she 22 23 should have received? No. 24 Α Do you know of anyone who has left a cable report 25

1	as affecting service when it should have been closed out-
2	out-of-service?
3	A No.
4	Q Have you ever done that yourself?
5	A No.
6	Q Have you ever heard of that being done?
7	A No.
8	MS. RICHARDSON: Ms. Terry, I'm, finished with my
9	questions, and I want to thank you for coming today and
10	being with us. I appreciate your time. Now, perhaps
11	the PSC may have one or two questions before you go.
12	CROSS EXAMINATION
13	BY MR. GREER:
14	
15	
16	
17	A Uh-huh.
18	
19	A Yes.
2 Ó	
21	
22	
23	MR. GREER: That is all I have.
24	MR. VINSON: I have one question.
25	CROSS EXAMINATION

```
1
     BY MR. VINSON:
 2
3
 4
          Α
                I don't remember. I don't remember.
 5
               MR. VINSON: That's all.
 б
               MR. ANTHONY: I don't have any questions.
               MR. DeBIANCHI: No questions.
 7
               MS. RICHARDSON: Okay.
 8
 9
               (The deposition concluded at 11:10 a.m.)
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
```

1 CERTIFICATE OF ADMINISTERING OATH 2 STATE OF FLORIDA: COUNTY OF LEON: 3 I, JANE FAUROT, Notary Public in and for the State 4 of Florida at Large: DO HEREBY CERTIFY that on the date and place 5 indicated on the title page of this transcript, an oath was duly administered by me to the designated witness(s) before 6 testimony was taken. DATED THIS 27th day of September, 1993. 7 JANE FAUROT 8 MY COMMISSION # CC295576 EXPIRES JANE FAUROT July 16, 1997 9 BONDED THRU TROY FAIN INSURANCE, INC. 100 Salem Court Tallahassee, Florida 32301 10 (904) 878-2221 MY COMMISSION EXPIRES: 7/16/97 11 12 CERTIFICATE OF REPORTER STATE OF FLORIDA) COUNTY OF LEON 13 I, JANE FAUROT, Court Reporter, do hereby certify 14 that the foregoing proceedings was taken before me at the time and place therein designated; that my shorthand notes 15 were thereafter translated under my supervision; and the foregoing pages numbered 1 through 33 are a true and correct record of the proceedings. 16 I FURTHER CERTIFY that I am not a relative, employee, attorney or counsel of any of the parties, nor 17 relative or employee of such attorney or counsel, or financially interested in the foregoing action.

DATED THIS 2744 day of September, 1993. 18 19 20 21 100 Salem Court Tallahassee, Florida 32301 22 $(904) \cdot 878 - 2221$ SWORN TO AND SUBSCRIBED TO BEFORE ME THIS 28th day of 23 September, 1993, IN THE CITY OF TALLAHASSEE, COUNTY OF LEON, 24

STATE OF FLORIDA, BY THE ABOVE PERSON WHO IS PERSONALLY KNOWN BY ME.

STATE OF FLORIDA

MELANIE Y. BRADFORD MY COMMISSION # CC 203402 EXPIRES: May 25, 1996 of Thru Notary Poblic Underwit