BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Docket No. 900960-TELECOLOU TE Filed: August 16, 1993

In Re: Show Cause proceeding against Southern Bell Telephone and Telegraph Company for misbilling customers

DEPOSITION OF:

MARTHA POWELL

DATE TAKEN:

Wednesday, September 1, 1993

TIME:

10:00 a.m.

PLACE:

900 North Nova Road Daytona Beach, Florida

REPORTED BY:

LISA L. TAYLOR, RPR-CP, Court Reporter and Notary Public

ALL PROFESSIONAL REPORTERS
444 SEABREEZE BOULEVARD, SUITE 470
DAYTONA BEACH, FLORIDA 32118
904-252-8443

DOCUMENT NUMBER-DATE

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APPEARANCES

REPRESENTING THE CITIZENS OF THE STATE OF FLORIDA:

CHARLES J. BECK, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399-1400

REPRESENTING SOUTHERN BELL TELEPHONE AND TELEGRAPH COMPANY:

ROBERT G. BEATTY, Esquire and NANCY WHITE, Esquire Museum Tower Building 150 West Flagler Street Suite 1910 Miami, Florida 33130

REPRESENTING FLORIDA PUBLIC SERVICE COMMISSION:

JEAN R. WILSON, Esquire Division of Legal Services 101 East Gaines Street Tallahassee, Florida 32399-0872

REPRESENTING MARTHA POWELL:

GREG JOHNSON, Esquire 1396 Dunlawton Avenue Suite C Port Orange, Florida 32127

ALSO PRESENT:

Carl S. Vinson, Jr.
Management Review Specialist
Bureau of Regulatory Review
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0872

Julia August Staff Manager BellSouth Telecommunications

Wilma Wilkins, Secretary/Treasurer Union Local 3102

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7		
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10		
11	STIPULATIONS	
12		
13	It is hereby agreed and so stipulated by	y and
14	between the parties hereto, through their respect	tive
L5	counsel, that the reading and signing of the tran	nscript are
L6	expressly reserved by the Deponent.	
L 7		
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1	<u>PROCEEDINGS</u>
2	MARTHA POWELL
3	having been first duly sworn, was examined and
4	testified upon her oath as follows:
5	DIRECT EXAMINATION
6	BY MR. BECK:
7	Q Ms. Powell, my name is Charlie Beck. I'm with the
8	Office of Public Counsel and I'll be starting out the
9	deposition this morning.
10	It will not be my intent this morning to ask you
11	the names of any other service representatives or members
12	of the union as far as trying to identify people who did
13	anything that's wrong. I'm not going to ask you the names
14	of any persons like that.
15	As we go through, if any of my questions are not
16	clear to you, would you please stop me and we'll clear it
L7	up before going forward. Is that agreeable to you?
18	A That's agreeable to me.
19	Q Could you please state your name?
20	A Martha Powell.
21	Q By whom are you employed?
22	A Southern Bell.
23	Q What position do you hold?
24	A Service rep.
25	Q Is that here in Daytona Beach?

1	A	In Daytona Beach.
2	Q	How long have you been a service rep here?
3	А	Since 1988.
4	Q	What did you do before that?
5	A	I worked in Miami as an engineering clerk and also
6	a servic	e rep. And before that, in Homestead as a service
7	rep.	
8	Q	How many years total do you have with the company?
9	A	I have 23 years.
10	Q	Are you familiar with the customer-centered sales
11	approach	?
12	A	Yes, I am.
13	Q	Could you describe briefly what that is?
14	A	Meeting the customer's needs with the products
15	that we	have, asking them questions and seeing if some of
16	our serv	ices could be of benefit to them.
17	Q	About how long have you been using that sales
18	approach	?
19	A	I don't remember.
20	Q	Do you recall a sales approach which preceded the
21	customer	-centered sales approach that's called the
22	assumpti	ve-sales technique?
23	A	I really have never heard of that phrase.
24	Q	Have you ever heard of a quick close?
25	A	Yes, I have.

Ţ	Q Could you describe that?
2	A It's been about ten years ago and it's hard for me
3	to remember.
4	Q You don't recall anything about it?
5	A Uh-uh (negative), no.
6	MR. JOHNSON: She can't take down uh-huh and I
7	won't say anything else. My wife's a court reporter so
8	I know better.
9	BY MR. BECK:
10	Q Do you receive evaluations or appraisals from the
11	company on a regular basis?
12	A Yes, we do.
13	Q About how often do you receive that?
14	A Once a year.
15	Q Do you know what the different criteria or grounds
16	are for your appraisal?
17	A Observation, your order accuracy, sales.
18	Q Do you know how those things are weighted?
19	A No, they the sales and the service used to be
20	weighted equally and now the service is weighted a little
21	higher.
22	Q
23	
24	A Yes, I have.
25	O Could you describe what happened?

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1
              Α
 2
              Q
 3
              Α
 4
              Q
 5
              Α
 6
              Q
 7
              Α
                    Yes.
                   Who was your supervisor at that time?
 8
              Q
                   Kathy Reagan (phonetic).
. 9
              A
10
                   And what happened after that, anything?
              Q
11
              Α
12
13
              Q
14
                    I don't understand.
              Α
15
              Q
16
                   I'm trying to think how to put it.
              Α
17
              Q
                   Okay.
18
                   They gave me a satisfactory appraisal.
              A
19
              Q
20
21
              Α
22
23
                   And you did so ---
              Q
24
                   Uh-huh (affirmative).
              Α
25
                    -- after that?
              Q
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1		Was the criteria a sales objective?
2	A	Uh-huh (affirmative).
3	Q	· -
4		
5	A	As far as I can remember.
6	Q	Do you recall whether the sales objectives were
7	being	raised at that time?
8	A	I don't really know.
9	Q	Did you think the sales objectives were fair at
10	that p	point in time?
11	A	Not really.
12	Q	Did you think it was difficult to meet those
13	object	ives?
14	A	I did, yes.
15	Q	Did any others in the any other service reps
16	you kn	ow of feel the same way?
17	A	I think some of them did, yes.
18	Q	Have you ever heard of anyone cheating in order to
19	meet a	sales objective?
20	A	Just rumors, I've heard, that's all.
21	Q	Now, without giving the names of any persons, what
22	kinds	of rumors did you hear about that?
23	A	Putting things on people's, you know, accounts
24	that t	hey didn't order.
2.5	0	Was that I don't know how to describe this

1	regular rumor or did you discuss it frequently?
2	A Oh, no; no.
3	Q Was there ever any talk that people cheating or
4	putting down sales was helping to raise the quota, thereby
5	making it more difficult to meet?
6	A No, I really didn't hear anything like that.
7	Q Have you ever had customers call in to the office
8	and tell you that they had services on their bill that they
9	had not ordered?
10	A Yes.
11	Q How would you handle that?
12	A First I would express regret that that happened
13	and then I would take it off and, you know, in effect,
14	bill date it back to the date that service went in.
15	Q Did you refer calls like that to any special
16	group?
17	A Yes, refer to my supervisor.
18	Q Would you make any special notations or reports
19	about those types of calls?
20	A No, I didn't personally.
21	Q Was there a time period when you received calls
22	like that more frequently than other time periods?
23	A I can't remember any one time was more than the
24	other.
25	Q Do you still receive those types of calls?

T	A	very, very serdom.
2	Q	How about, like, three years ago, were they more
3	prevalent	then?
4	A	I can't remember, it's been so long.
5	Q	Do you have any trouble meeting the present sales
6	objective	es?
7	A	Right now, I don't, no.
8	Q	Are you familiar with the term "bridging"?
9	A	Uh-huh (affirmative).
10	Q	Have you ever been counseled about doing more
11	bridging	than you used to?
12	A	Yes.
13	Q	Could you describe what bridging is?
14	A	Bridging is when a customer calls in to ask about
15	services	I mean, ask about a problem on their account or
16	whatever	. When we take care of that problem, then we're to
17	see if tl	here's any services that they could benefit from.
18	Q	Are there any types of calls where you do not
19	bridge?	
20	A	Yes.
21	Q	What types?
22	A	Calls that you transfer to other departments, such
23	as repai	r, because we want to take care of their problem
24	that the	y have right now first.
25	Q	Is that the only time?

1	A When we transfer calls to collections, you know,
2	when they need to make arrangements on their bills or
3	things like that or AT&T, if they need to go to AT&T.
4	Q Have you ever tried to bridge a customer on an
5	occasion when you didn't think it was appropriate to do so
6	A' No.
7	Q Have you ever tried to sell services to a custome:
8	who you felt really couldn't afford the extra services?
9	A No.
10	Q Have you ever told anybody in management, either
11	supervisor or manager, that you had heard that people were
12	cheating to make sales quotas?
13	A No.
14	MR. BECK: That's all I have. Thank you.
15	There may be others.
16	CROSS-EXAMINATION
17	BY MS. WILSON:
18	Q
19	
20	
21	A
22	
23	Q Did you feel that there was undue pressure being
24	placed on you to make sales at that time?
25	A No.

1	MS. WILSON: Carl, do you have anything?
2	MR. VINSON: No.
3	MR. BECK: I guess that's it.
4	MR. BEATTY: I do have one question.
5	CROSS-EXAMINATION
6	BY MR. BEATTY:
7	Q You indicated, I believe, in response to Mr.
8	Beck's questions that you currently are able to make your
9	sales objectives; is that correct?
10	A Uh-huh (affirmative), yes.
11	Q Do you feel that the current sales objective is a
12	fair one?
13	A Yes.
14	MR. BEATTY: I have nothing further.
15	(Whereupon, the taking of the deposition was
16	concluded at 10:05 a.m.)
17	
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1	CERTIFICATE OF OATH
2	
3	STATE OF FLORIDA)
4	COUNTY OF VOLUSIA)
5	
6	I, LISA L. TAYLOR, RPR-CP, Notary Public for the
7	State of Florida at Large, do hereby certify that I did, at
8	the time and place herein designated, place under oath the
9	deponent, MARTHA POWELL, who was thereupon examined.
10	I FURTHER CERTIFY that I am not of counsel for,
11	related to, or employed by any of the parties or attorneys
12	involved herein; nor am I financially interested in said
13	action.
14	WITNESS MY HAND AND SEAL this 8th day of October,
15	1993, in the City of Daytona Beach, County of Volusia,
16	State of Florida.
17	
18	
19	
20	Tion Voy
21	LISA L. TAYLOR, RPR-CP, Notary Public. State of Florida
22	LISA L. TAYLOR My commission expires:
23	Comm. No. CC 153009 November 1, 1995
24	

_	CERTIFICATE
2	STATE OF FLORIDA
3	COUNTY OF VOLUSIA)
4	I, LISA L. TAYLOR, RPR-CP, Court Reporter, do
5	hereby certify that I did, at the time and place herein
6	designated, record the testimony of MARTHA POWELL, who was
7	thereupon examined; that said testimony was recorded by me
8	in shorthand; that the foregoing 13 pages constitute a
9	complete and accurate transcript of said examination and
10	proceedings.
.1	I FURTHER CERTIFY that I am not of counsel for,
12	related to, or employed by any of the parties or attorneys
13	involved herein; nor am I financially interested in said
.4	action.
L 5	WITNESS MY HAND this 8th day of October, 1993, in
L6	the City of Daytona Beach, County of Volusia, State of
L 7	Florida.
Ł8	$\rightarrow \mathcal{D}$.
L9	LISA L. TAYLOR, RPR-CR,
20	Court Reporter
21	The foregoing instrument was acknowledged before me this Shh day of Criober 1993, by
22	Lisa L. Taylor, RPR-CP, who is personally known to me.
23	Liva Denoc Isinon
24	Notary Public, State of Florida
25	Notary Public, State of Florida LISA RENEE VINSON My Comm. Exp. May 19, 1996 Comm. No. CC 202334

1	SUBSCRIPTION OF DEPONENT	
2	STATE OF FLORIDA)	
3	COUNTY OF VOLUSIA)	
4	I, MARTHA POWELL, do hereby certify, having	
5	read the foregoing deposition taken on September 1, 1993 that said transcript is a true and accurate recording of the proceedings had at the time and place designated, wi	
6	the following exceptions, if any:	CII
7		
8	MARTHA POWELL	
9	Date	
10	Sworn to and subscribed before me this	
11	day of, 1993.	
12		
13	Notary Public My Commission expires:	
14	ry Commission expiles.	
15	ERRATA PAGE	
16	I, the Deponent, wish to make the following corrections:	
17	Page Line Correction	
18	rage Line Collection	
19		
20		
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