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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

920280-TL

DOCKET NO. 910163-TL

FILED: June 11, 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.)

CERTIFIED COPY
Williams & Hahn

Pompano Beach, Florida

June 23, 1993

1:35 o'clock p.m.

* * *

DEPOSITION

OF

ROBERT FECHT

* * *

DOCUMENT NUMBER-DATE

09503 SEP-28

RECORDED/INDEXED

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LAWYER'S NOTES

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I N D E X

<u>WITNESS</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>
ROBERT FECHT	5	63	65

E-X-H-I-B-I-T-S

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Deposition of ROBERT FECHT, a witness of
lawful age, taken by the OFFICE OF THE PUBLIC COUNSEL, for
the purpose of discovery and for use as evidence in the
above-entitled matter, 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, pending
before the FLORIDA PUBLIC SERVICE COMMISSION in and for
the State of Florida, pursuant to notice heretofore filed,
before CHRISTINE A. AMAN CANNON, a Notary Public in and
for the State of Florida at Large, Southern Bell Telephone
& Telegraph Company, 1230 North Federal Highway, in the
City of Pompano Beach, County of Broward, State of
Florida, on the 23nd day of June, 1993, commencing at 1:35
o'clock p.m.

* * *

Thereupon:

ROBERT FECHT

a witness of lawful age, being called as a witness by the
Florida Public Service Commission, having been first duly
sworn, testified under oath as follows:

DIRECT EXAMINATION

BY MS. RICHARDSON:

Q. Mr. Fecht, would you please state your name and
spell it for the court reporter.

1 A. Robert M. Fecht Sr, R-O-B-E-R-T M. as in Martin
2 F-E-C-H-T.

3 Q. Your address please.

4 A. 6451 North Federal Highway, room 1016, Fort
5 Lauderdale, Florida.

6 Q. Do you have a zip code for that?

7 A. 33331.

8 Q. Is that a business address?

9 A. Yes.

10 Q. And your phone number.

11 A. 492-3008.

12 Q. That's your business?

13 A. Uh-huh.

14 Q. Are you represented by an attorney here today?

15 A. No.

16 Q. What is your present position with the company?

17 A. Associate staff manager.

18 Q. Is that a first level position?

19 A. It's pay rate four. It's kind of like a step and
20 a half.

21 Q. Have you discussed this deposition here today
22 with anyone other than counsel for the company?

23 A. What deposition?

24 Q. The one that we're taking here today.

25 A. No.

1 Q. Has anyone advised you that you would not be
2 disciplined based upon your answers given today?

3 A. Yes.

4 Q. Has anyone advised you of the possible criminal
5 penalties that could apply if you perjure your testimony
6 here today?

7 A. No. I've been told to tell the truth and not
8 worry about that. And I wouldn't be disciplined as long
9 as I told the truth.

10 Q. Have you given a statement to the company in
11 terms of their repair investigation?

12 A. Yes.

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

14 A. Not specifically. I think I talked to our
15 security department two or three different times and the
16 legal department once something like two or three years
17 ago.

18 Q. Who was present when you talked to the security
19 department?

20 A. I'm really not sure. We had -- I had an attorney
21 and the internal security company attorney. I guess it
22 was a representative and our security people in both
23 instances. I think -- Were you in the first one Robert?
24 I don't remember but I know we did have an attorney and
25 security people on the review.

1 Q. Was anyone else present beside the attorneys and
2 the security?

3 A. No.

4 Q. Did you discuss that statement with anybody?

5 A. No.

6 Q. Were you asked to assist the company in
7 performing their internal audits that they conducted on
8 the operations systems in 1991?

9 MR. BEATTY: The internal audits?

10 MS. RICHARDSON: The internal audits.

11 A. Yes. I assisted in the internal audits.

12 Q. Which auditor did you work with?

13 A. It was the auditing department down in Miami.
14 And there were about four or five of them involved in it.
15 All of them reported to Maria Gonzalez I believe her name
16 was who's a pay rate five at that time.

17 Q. Did you work on the LMOS audits?

18 A. What's an LMOS audit?

19 Q. Are you familiar at all with the term LMOS?

20 A. Oh, yes.

21 Q. Do you know what it is?

22 A. Yeah. I know what LMOS is.

23 Q. Were you aware that the company had audited the
24 LMOS system in 1991?

25 A. I guess I don't understand. LMOS is a base for

1 customer line records.

2 Q. Were you aware that the company audited that
3 system in 1991?

4 A. I know they were looking at trouble reports.

5 Q. Do you know the titles of any of the audits that
6 you assisted on?

7 A. Most of the audits -- I really didn't assist on
8 the audits per say. I more or less trained the auditors
9 in the procedures that were used or what the practice
10 stated that was suppose to be done. We did some
11 out-of-service look, some CON.

12 MR. BEATTY: Just a minute. If you would at this
13 point keep your comments general as opposed to
14 discussing the subject matter of the specific question
15 because I may have an objection at that point.

16 Q. What training did you give the auditing
17 department?

18 MR. BEATTY: Are you asking a question that
19 would -- what training was provided with respect to
20 subject matter?

21 MS. RICHARDSON: Let's just get real specific and
22 then you can place the objection on the record.

23 Q. What specific items did you train the auditing
24 department to look at?

25 MR. BEATTY: I'm going to object. The audits are

1 privileged and confidential subject to the attorney
2 client privilege and attorney work product. Therefore,
3 Mr. Fecht's work with respect to the audit would fall
4 within the purview of those privileges as well.

5 Accordingly, I would request the witness not to
6 respond to that. And Bob, you need to tell her that
7 you will not respond to that because of the
8 application of the privilege.

9 A. Because of the application of the privilege, I
10 would not respond to that question.

11 Q. Who determined what aspects of the operation
12 system you would train the auditors on?

13 A. I don't know.

14 Q. Did the auditors come to you with specific
15 questions in terms of, how do I look at out-of-service
16 statusing, for instance, that they needed training on from
17 you?

18 MR. BEATTY: I'm going to object. Are you asking
19 him did they come to him with specific questions
20 generically or did they come to him with specific
21 questions and one of those questions was
22 out-of-service statusing?

23 Q. Let me see if I can do it this way. Mr. Fecht,
24 since we're treading on supposedly privileged grounds
25 here. Did the auditors that you worked with come to you

1 with a specific request for training already in mind when
2 they talked to you?

3 MR. BEATTY: If you can.

4 A. No.

5 Q. When the auditors came to you, did they describe
6 in general the kind of activities that they wanted to look
7 at in their audit?

8 MR. BEATTY: Yes or no if you can.

9 A. Give it to me one more time.

10 Q. For example, did the auditors come to you and say
11 we need to find out how to check on whether or not anyone
12 has backed up clearing times improperly on customer
13 records?

14 MR. BEATTY: I'm going to object to that question
15 because the answer would actually disclose the
16 substance of attorney client privilege and work
17 product information unless that was merely an example
18 of instructions generally such that the auditors came
19 to him with specific requests as opposed to someone
20 else determining what the auditors were going to look
21 at.

22 Q. In this process if you're assisting with the
23 auditing, how much was left to your discretion in terms of
24 the training of the auditors?

25 A. None of it was at my discretion. Mainly what

1 came up was, what is the interpretation of the practice
2 and how should it be handled on a trouble report and the
3 proper way to do it. That was basically what their
4 questioning was and my training to them.

5 Q. Do you do operational reviews for the company?

6 A. Yes.

7 Q. And in terms of operation review, is part of your
8 duties to look for how the procedures have not been
9 followed?

10 A. As far as the practice goes now, right, trouble
11 reports verses the practice.

12 Q. In terms of the training that you did with the
13 auditors, did you also instruct them things to look for
14 that would raise questions about whether or not that any
15 particular report had been stated properly or
16 improperly?

17 MR. BEATTY: Objection on the grounds that it
18 causes there to be revealed attorney client work
19 product information. And I would instruct the
20 witness, therefor -- I would request the witness,
21 therefor, not to respond.

22 Q. You need to tell me you either are going to give
23 me an answer or you're not giving me an answer because of
24 counsel's advise.

25 A. Can I talk to you a minute.

1 (Thereupon, an off the record discussion was
2 held.)

3 A. I'd rather not respond due to the privileged
4 information.

5 Q. Mr. Fecht, how long have you been an associate
6 staff manager?

7 A. I think it's approximately fourteen years.

8 Q. During that entire fourteen years, have you been
9 in the South Florida area?

10 A. South, southeast areas, yes.

11 Q. During your fourteen years as an associate staff
12 manager, have you been conducting operation reviews that
13 entire time?

14 A. No.

15 Q. How long have you been doing operation review?

16 A. Probably for the last seven or eight years.

17 Q. During that seven or eight years, how many times
18 have you been called upon to assist auditing in audits
19 that they have performed?

20 A. Only twice.

21 Q. One time we've been discussing was with the 1991
22 internal audit. When was the other time?

23 A. It was just prior to that the year before -- No,
24 wait. '91 was the first one they did; is that correct?

25 Q. Yes.

1 A. I was asked to help them with another one in '92.

2 Q. When you did the '92 audit, what was your
3 function?

4 MR. BEATTY: Just please respond in a generic
5 way that does not cause there to be a disclosure of
6 the substance.

7 A. At that time we were looking at trouble reports
8 specifically. When I say we, that's staff people that
9 belong to internal audits.

10 MR. BEATTY: Excuse me.

11 (Thereupon, an off the record discussion was
12 held.)

13 Q. Did you perform the analysis on the trouble
14 reports for the auditing department?

15 A. What do you mean by analysis?

16 Q. All right. If they were looking specifically for
17 whether or not clearing times have been backed up if that
18 would have been one of the questions, would you have been
19 the one to look at the trouble reports to make that
20 determination?

21 A. If that was one of the items, yes.

22 Q. Having assisted with the 1991 audit, operational
23 audits, what conclusions did you draw about Southern
24 Bell's handling of trouble reports?

25 MR. BEATTY: At this point I object on the

1 grounds that the information would call there to be
2 a disclosure of the attorney client work product
3 privileged information and therefor, Mr. Fecht, I
4 would request that you don't respond.

5 A. I'll go along with that.

6 Q. Mr. Fecht, what conclusions did you draw from
7 your participation with the 1992 audit?

8 MR. BEATTY: Same objection. Mr. Fecht, I
9 request that you not respond based upon the fact that
10 these are privileges of the attorney client work
11 product and to the substance of that information.

12 A. Same.

13 Q. Were the results from the '92 audit different
14 from the results of the '91 audit?

15 MR. BEATTY: On the basis of the attorney
16 client privilege and the attorney work product
17 doctrine in that the disclosure of that information
18 would be a violation of those privileges. I request
19 Mr. Fecht, you do not respond.

20 A. Same.

21 Q. Mr. Fecht, have you given a statement to the
22 Attorney General?

23 A. Yes.

24 Q. Do you recall that statement?

25 A. Yes.

1 Q. Did you discuss with the Attorney General at any
2 point the use of inside wire codes, twelve hundred codes?

3 A. Yes.

4 Q. And can you briefly explain to me what you
5 discussed with the Attorney General on that.

6 A. There was several different items that were
7 brought up. Can you be more specific.

8 Q. I'm asking on the twelve hundred codes, the CPE
9 codes specifically.

10 A. Again, there were several different subjects that
11 the twelve hundred code came up under.

12 Q. Do you recall a particular report that indicated
13 an overuse, statistical overuse of the twelve hundred
14 codes in South Florida?

15 A. Yes.

16 Q. That's the one I'm interested in finding out. If
17 you would just give me a brief resume of what you recall
18 from your statement to the Attorney General on that.

19 A. This was found during everyday analysis in
20 looking at repeated reports. I had found that in a
21 particular division two second level groups were very low
22 in repeated reports. When I say very maybe a half a point
23 to a point different from what the norm was.

24 And in investigating I found that the CPE code at
25 that time the twelve hundred nonregulated codes were

1 proportionately higher in those two particular second
2 level groups.

3 At that time we were not scoring repeated reports
4 on deregulated codes only on the network codes. And I
5 found some problems with the use of the twelve hundred
6 codes at that time.

7 Q. Did you determine whether or not any customer
8 might have been denied a rebate based upon the use of
9 those twelve hundred codes?

10 A. At the time that never even entered my mind.

11 Q. Have you gone back since you did that report to
12 look and see if any customers had in fact been denied a
13 rebate because of the overuse of those codes?

14 A. No.

15 Q. Did you do any particular follow-up after you
16 found the overuse of those codes, the twelve hundred
17 codes?

18 A. A couple of months later, yes.

19 Q. What did you find on the follow-up?

20 A. That they were returning to normal.

21 Q. Did you draw any conclusions as to why they were
22 returning to normal?

23 MR. BEATTY: Objection. It calls for
24 speculation. You can respond to that if you can.

25 A. We had presented this information to the managers

1 in that division that we had found a problem and expected
2 it to be taken care of.

3 Q. Did you draw any conclusions as to whether or not
4 this had been deliberately -- The overuse of the codes had
5 been deliberate by these managers?

6 A. No.

7 Q. Did you draw any conclusions as to whether or not
8 the overuse of the twelve hundred codes was just a
9 mistake?

10 A. No.

11 Q. Was that a question that you considered at all
12 when you looked at this twelve hundred code overuse?

13 MR. BEATTY: Object to the form of the question.

14 Was what a question?

15 Q. Was whether or not the overuse was deliberate or
16 by mistake or accidentally.

17 A. Start all over again.

18 Q. That's the kind of question. When you saw the
19 overuse, did you question why it was being done?

20 A. Again, I picked it up on a reduction of repeated
21 reports in those two managers' groups over the rest of the
22 managers' groups within the area. That's what keyed me
23 into it.

24 I mean, we want to reduce repeats okay but again,
25 you don't look at everything when you do analysis. You

1 don't just key in on one thing.

2 Q. Did you perform that same kind of analysis on the
3 twelve hundred codes when you found the problem in that
4 area and any other areas in Florida?

5 A. I only looked at the southeast area.

6 Q. Did you check that particular problem the overuse
7 of twelve hundred codes in any other IMC district,
8 division, unit, whatever you break them down to? 3

9 A. Not at that time.

10 Q. Have you done it since then?

11 A. We do reviews that cover that.

12 Q. Have you found any problems or have you found any
13 other instances of overuse in the reviews that you have
14 done?

15 MR. BEATTY: Overuse?

16 Q. Overuse of the twelve hundred codes.

17 A. Not in the reviews I've done, no.

18 Q. You said by a point or two might be considered
19 overuse. Can you explain how much is overuse?

20 MR. BEATTY: I object to the form of the
21 question. Counsel is testifying and seeking to
22 recharacterize the testimony that has come up on this
23 record previously.

24 A. Say what?

25 Q. How do you decide that the twelve hundred code

1 has been overused; what jumped out at you?

2 A. Everything is percentages and you look for norms.
3 You look for highest and lowest. And you usually
4 investigate the highest and lowest. The percent of twelve
5 hundred codes was a high usage compared to the rest of the
6 area. And in that particular type of entity, I further
7 investigated.

8 Q. How many points over the average would a use of a
9 particular code have to be to indicate that you might need
10 to look at it further?

11 A. Again, you got to know the business. There's a
12 lot of things that drive particular codes. Demographics
13 will drive the code.

14 MR. BEATTY: Are you able to give her a
15 percentage?

16 A. No. Not to give you a flat number, no.

17 Q. I'm going to make this Exhibit 1. It is Public
18 Counsel's graph and it's got a base stamp number two on
19 the bottom right-hand corner. And it's titled Yearly
20 Average over Twenty-four Hours Out-of-Service Reports.
21 And the source for that would be PSC schedule 11A file by
22 the company.

23 (Thereupon, the graph referred to was marked as
24 Public Service Commission's Exhibit No. 1 for
25 identification.)

1 MR. BEATTY: Excuse me. Is this a
2 document supplied to you by Southern Bell?

3 MS. RICHARDSON: No. This is a document that was
4 created by our staff based upon the schedule 11A
5 reports filed by Southern Bell with the Public Service
6 Commission.

7 It was introduced for the first time at the panel
8 deposition held in May of 1991. Southern Bell had
9 five panel individuals there at that time. At that
10 time I stipulated with Mr. Anthony that since we had
11 taken this information directly from the 11A that it
12 was certainly, you know, no problem for me if the
13 company wanted to verify this craft based upon the 11A
14 that they had in their own files.

15 Since then I have not heard anything contrary to
16 what we have here but that a proffer was made for the
17 company that there may have been some key strokes in
18 imputing data but the data was taken directly from
19 the schedule 11A report.

20 MR. BEATTY: Well, you know, feel free to ask the
21 questions. I do object to its use here. I do. This
22 document has not been authenticated, cannot at this
23 point be authenticated.

24 This witness -- This particular witness
25 has not I assume and Mr. Fecht, correct me if I'm

1 wrong -- has not had any impute in the creation of
2 this document and has no way to insure the accuracy of
3 this document or the information from which it was
4 extracted.

5 I do understand where the information was
6 obtained from but to ask this witness an opinion
7 based on what this document appears to reveal is
8 objectionable, you know, certainly without
9 the backup documentation.

10 For example, if you have the Schedule 11A
11 supplied to the PSC from which this document, Exhibit
12 No. 1 has been created then that would give this
13 witness an opportunity to review the source documents
14 as well as this document for accuracy.

15 And he would then be in certainly a more tenable
16 position not even saying that that position is one
17 that could justify his answer but certainly more of a
18 tenable position to provide a response. Without that,
19 to ask this witness questions regarding this document
20 would be unfounded.

21 Q. Mr. Fecht, subject to any further checking that
22 you may want to do in terms of the accuracy of the data
23 that comprises this document, I have some general
24 questions that I would like to ask in terms of when you
25 look for highest and lowest to see if something maybe a

1 little off kilter.

2 Looking at this Schedule 11A data that's been
3 plotted '87, '88, '89, '90 and so on in terms of the way
4 this is graphed and the numbers of the reports going from
5 a little over 1.8 in 1987 and then dropping to 1.4 in 1988
6 through '90 and then escalating to roughly 2.3 thousand in
7 1991, would you consider this the kind of information that
8 might trigger questions in terms of highest and lowest?

9 MR. BEATTY: Again, I object to this document
10 serving for the basis of any questions posed to this
11 witness. This witness is not the author or
12 contributor to or of this document and therefor,
13 cannot be expected to reach any conclusion based upon
14 the normal way that he conducts business in terms of
15 percents and percentages. He can't be expected to
16 reach a conclusion on this. And I would object. Now
17 having said that, are you able to respond to her?

18 A. No.

19 Q. Mr. Fecht, when you do -- Do you do statistical
20 analysis?

21 A. Most of mine is tracking.

22 Q. When you track, do you track the total numbers of
23 reports by categories?

24 A. In some cases.

25 Q. For instance, was your review of the twelve

1 hundred codes a tracking process?

2 A. It's a -- You're talking about --

3 Q. During the review that you discussed with the
4 Attorney General and this today.

5 A. That was not a review.

6 Q. That was not a review?

7 A. That was a daily activity.

8 Q. What did you say, daily --

9 A. That was found through day-to-day activity.

10 Q. Give me an example of a report that you would
11 track.

12 A. Customer report rate.

13 Q. How would you track a customer report rate?

14 A. Year to year, month to month.

15 Q. When you say year to year and month to month, are
16 you looking at specific numbers of trouble reports?

17 A. No. Normally, you're looking on a percentage.

18 Q. You're looking at a percentage. If you were to
19 make a conclusion about whether or not the report rate was
20 excessive, what kind of things would you look at in terms
21 of the percentages?

22 A. You got to realize reports are driven up by
23 customer direct reports. What's changed from the
24 previously -- Look, there's so many things that come into
25 it. That's a very vague question really.

1 Q. Do you look at the differences between the number
2 of out-of-service reports and the number of effecting
3 service rates.

4 A. Not for report rate.

5 Q. Does report rate include both of them?

6 A. Yes, ma'am.

7 Q. Do you have any reports that you follow that
8 track the number of out-of-services verses the effecting
9 service reports?

10 A. Yes.

11 Q. Do you have any reports that you follow that
12 track the number of out-of-service over twenty-four hour
13 reports?

14 A. Yes.

15 Q. Do you have reports that track the number of
16 out-of-service over forty-eight hour reports?

17 A. Yes.

18 Q. On those particular reports, is there a month to
19 month tracking on out-of-service over twenty-four hours?

20 A. That report is available. I very seldom look at
21 it.

22 Q. In terms of the graph I have in front of you
23 labeled Yearly Average over Twenty-four Hours
24 Out-of-Service Reports, have you in your experience in
25 dealing with out-of-service reports, tracking those

1 reports, have you ever done that? Have you ever tracked
2 an out-of-service over twenty-four hour report?

3 A. No.

4 Q. Have you ever tracked the total number of
5 out-of-service reports?

6 A. No.

7 Q. When you do operation reviews, do you look at the
8 numbers of out-of-service reports over twenty-four hours?

9 A. No.

10 Q. Have you experienced any differences in the way
11 maintenance centers have handled the processing of
12 out-of-service reports before 1990 and after 1991?

13 MR. BEATTY: I'm going to object to the form
14 of the question. It's ambiguous. You can respond
15 to that if you can.

16 A. Give it to me again.

17 Q. Were you responsible for being aware of the
18 company's practices for statusing and coding trouble
19 reports?

20 A. Yes.

21 Q. Have you experienced any differences in the way
22 the company has handled out-of-service reports before 1990
23 and after 1991?

24 MR. BEATTY: I'm going to object to the form of
25 the question. It's ambiguous.

1 Q. Let me try one more time. Let's make it specific
2 in terms of statusing out-of-service, determining when a
3 report is out-of-service. Was that the same in 1991 as it
4 was in '90.

5 A. Yes.

6 Q. Was the procedure for recording clearing times on
7 trouble reports the same in 1991 as it was in '90?

8 A. Yes.

9 Q. In doing your operation reviews -- Did you do any
10 operation reviews in 1990?

11 A. Yes.

12 Q. In doing those reviews, did you look at statusing
13 for out-of-service in 1990?

14 A. Yes.

15 Q. Did you do any operation reviews in 1991?

16 A. Yes.

17 Q. Did you look at statusing of out-of-service in
18 1991?

19 A. Yes.

20 Q. In 1990 did you look at determinations of
21 clearing times on reports?

22 A. No.

23 Q. Your operation reviews in 1990, did you at all
24 look at receipt of clearing time?

25 A. No.

1 Q. Did do you that in 1991?

2 A. No.

3 Q. Mr. Fecht, when you did this track, this report
4 on the twelve hundred codes, did you do any similar
5 reports with cause codes?

6 A. At that time?

7 Q. Yes.

8 A. No.

9 Q. Have you done any since?

10 A. You're talking outside reviews or inside reviews?

11 Q. Can you explain the difference to me.

12 A. Well, a review will look at cause codes.

13 Q. Yes.

14 A. On a normal day-to-day basis I may do analysis on
15 cause codes. Which are you talking about?

16 Q. I'd like to talk about both. So let's take the
17 day-to-day basis on cause codes. Have you done reviews
18 between 1990 and 1992 on cause codes?

19 A. Yes.

20 Q. And have you done the same --

21 A. Wait a minute. Wait a minute. Between '90 and
22 '92?

23 Q. Yes.

24 A. Cause codes, I don't believe that was part of the
25 reviews in 1991.

1 Q. Was it part of them in '92?

2 A. I believe that's when we implemented them in in
3 '92. I can't swear to it.

4 Q. When you say implemented, do you mean in the
5 standardization of compliance reviews?

6 A. Right.

7 Q. Let's take a look at -- I'm going to introduce
8 Exhibit 2 titled Standardization and Compliance Review and
9 S & C Review 1992 at the bottom. And we'll take this
10 Exhibit 2 and as soon as we get copies out here, we'll
11 pass them out.

12 (Thereupon, the twenty-seven page document
13 referred to was marked Public Service Commission's
14 Exhibit No. 2 for identification.)

15 Q. Are you familiar with this document?

16 A. Yes.

17 Q. Do you use this document in your review work?

18 A. We did.

19 Q. Did you contribute to this document in terms of
20 the development of the document itself?

21 A. Yes.

22 Q. I'd like to go through and look at Section A
23 which is labeled "Employee Reports." What is an employee
24 report?

25 A. We call it an EO. It's a report that's been

1 picked up by an employee without conversation with the
2 customers.

3 Q. Where it says reviewers hints, who uses these
4 hints?

5 A. Reviewers themselves and the maintenance centers
6 are suppose to do their own reviews using this document.

7 Q. So this document is used outside of the staff
8 reviewers?

9 A. Yes.

10 Q. Has that always been the case?

11 MR. BEATTY: I'm going to object to the form of
12 the question.

13 Q. Is this a rewrite of an earlier document?

14 A. Yes.

15 Q. On the earlier version of this document -- Was
16 the earlier version used in the IMCs also?

17 A. Yes.

18 Q. Did they also have the reviewers hints?

19 A. Yes.

20 Q. Can you tell me what changes were made under the
21 reviewers hints in the 1992 version?

22 MR. BEATTY: If you know.

23 A. I don't believe there was any employee reports
24 but I don't know.

25 Q. Under the examples it says, "Employee reports

1 issued to complete repairs on an existing trouble report."

2 Is that a proper or improper activity?

3 A. Improper.

4 Q. Can you explain to me whether or not you have
5 found in your reviews between '90 and '91 and '92 any
6 examples of that?

7 A. A few.

8 Q. Did you find any examples of that that you
9 concluded were other than just mistakes?

10 A. Can you rephrase that question.

11 Q. Other than say the employee needed to be
12 retrained for errors?

13 A. No.

14 Q. Under number two, "Employee reports issue to
15 clear a customer trouble report and the original report
16 was excluded." Is that proper or improper?

17 A. Improper.

18 Q. In your reviews did you find any instances of
19 this activity occurring to a degree that could connote
20 intentional activity?

21 A. Not in my reviews.

22 Q. Did you come upon this process anywhere else?

23 A. No.

24 Q. In terms of the staffs doing their own reviews,
25 do you know of any staff who have uncovered problems in

1 that particular area on their own?

2 A. No.

3 Q. The third one indicates, "Employee reports issued
4 to clear multiple troubles on a customer report." Is that
5 proper or improper?

6 A. Improper.

7 Q. And can you explain to me why it's improper.

8 A. This was mainly done for tasks crafts. It had
9 nothing to do with the actual trouble report.

10 Q. These reports under number three, should those
11 reports have been coded as customer direct reports?

12 A. No.

13 Q. So they were properly coded as employee reports?

14 A. They should not. What we're looking for here in
15 this particular instance is an employee will go out and
16 replace a drop, okay bad drop. Customers has service.
17 Everything is back together.

18 Again, he might have to replace something as a
19 precautionary measure. That should all be done under the
20 trouble report. It has nothing to do with the customer
21 report or how long they're out-of-service or anything like
22 that.

23 Q. If it's a drop problem and the trouble is
24 reported, should it be a customer direct report?

25 A. If the customer reported it, yes.

1 Q. And if it was filed an employee originated
2 report, would the customer receive a rebate if that
3 customer was out-of-service more than twenty-four hours?

4 A. No.

5 Q. Have you found any instances of that occurring
6 when you reviewed item number three under hints?

7 A. No.

8 Q. Fourth example, "Employee reports issued when a
9 trouble report is received on a special call-back number
10 located in the district/turf given to the customer on a
11 repair or installation visit, previous no-access, or on a
12 repeat report reduction plan. Do you have any knowledge
13 of that occurring in your area?

14 A. No.

15 Q. Have you heard of that occurring in West Palm
16 Beach?

17 A. No.

18 Q. Is West Palm Beach in your area?

19 A. Yeah.

20 Q. Has that occurred on any reviews that you have
21 conducted personally?

22 A. What time frame are you talking about here?

23 Q. Let's take it back as far as 1986.

24 A. To?

25 Q. To present day.

1 A. Indian River, I just finished a review up there
2 the first part of the year. And they had a call-back
3 number that was only used when they were calling back
4 customers to find out if their service was okay which is
5 perfectly legal to generate an employee report on.

6 If they were running into trouble, they were
7 leaving a telephone number or if they reached a recorder,
8 they would leave a telephone number to call back into the
9 maintenance center. And at the time they received that
10 call, it was generated as an employee report. I couldn't
11 determine the number that were involved but it was stopped
12 immediately as soon as we found the problem.

13 Q. You mean the number of customers that reported
14 the problem?

15 A. Number of customer trouble reports.

16 Q. Do you know how many employees in Indian River
17 were involved in that procedure?

18 A. No.

19 Q. Do you know who instituted that procedure?

20 A. No.

21 Q. Who did you report this finding to?

22 A. It was reported through the review process.

23 Q. And when saw say through the review process, who
24 does that go to?

25 A. As high as Mr. Sanders.

1 Q. Can you give me Mr. Sanders title?

2 A. Vice president of Florida, president of Florida.

3 Q. Were the reporting procedures for operation
4 reviews changed in 1992?

5 A. Yes.

6 Q. What were they before 1992.

7 A. That's -- You're talking about this page?

8 Q. No. Just in general, the reporting procedures
9 for operation reviews before 1992. Who got the reviews;
10 who heard about that?

11 A. Just the division manager down in that particular
12 division.

13 Q. The manager who was supervising the other people
14 that were doing whatever the improper activity was?

15 A. Usually the division manager who is the turf
16 manager who has that particular division.

17 Q. Was a change made in '92?

18 A. I believe it was, yes.

19 Q. Now who do those reviews go to?

20 A. They go to the attorneys. They go to the general
21 managers. They go to the legal department. They go to
22 internal audits.

23 Q. Is there any procedure for getting security
24 involved if you find actual evidence of fraud?

25 A. Yes.

1 Q. When you do a review -- If you would, I would
2 like to go to Section B which is "Excluded Reports".

3 A. Uh-huh.

4 Q. Can you briefly tell me what an excluded report
5 is.

6 A. An excluded report is normally one that would not
7 be counted in the trouble report because it didn't pertain
8 to our equipment. It could also be because there is a
9 service order involved and the service order is pending,
10 instructions given to the customer on how to operate a
11 feature that they didn't understand. There's several
12 reasons to exclude a report.

13 Q. Are any of those reasons -- Excuse me. Let me
14 put it this way. Is it proper under company procedures to
15 exclude out-of-service reports?

16 A. No. You're talking about a report --

17 Q. That has been statused out-of-service.

18 A. It can be done. There's reasons to exclude
19 reports whether they're marked out-of-service or not. It
20 depends on the nature of the trouble report.

21 Q. Do you know whether or not in this '92 version
22 there are any changes that were made in the way you looked
23 at excluded reports from the prior practice?

24 A. No.

25 Q. I'd like to look at the reviewers hints on this

1 section. Number one. It says "Closed narratives must
2 substantiate the exclude." Has that always been part of
3 this practice?

4 A. Yes.

5 Q. What's the purpose of having a closed narrative
6 that explains the exclude?

7 A. So we can verify that it corresponds to the item
8 in the practice that it's excluded.

9 Q. Under number two, "As per 660-169-012BT, par.
10 3.1, A change of appointment for Company reasons to a
11 later time than originally given the customer shall be
12 considered a Missed Appointment. If the appointment is
13 changed, a Customer Direct report will be used. DO NOT
14 use a CX subsequent to change appointment."

15 Can you tell me what the effect would be of using
16 a CX subsequent to change appointment instead of a
17 customer direct?

18 A. If a CX subsequent to change appointment is used
19 prior to missing the appointment and the appointment is
20 moved out, that new appointment becomes the appointment
21 for result purposes.

22 Q. When you say result purposes, do you mean
23 counting the number of out-of-service over twenty-four?

24 A. It has not nothing to do with out-of-services.
25 It has to do with appointments.

1 Q. I'm doing a little tracking in my mind. I want
2 to think about what you said. I'm sorry for the pause.
3 Then if the appointments had been CX'd, would that be
4 proper or improper?

5 A. That would be improper.

6 Q. If an appointment had been CX'd, would that
7 assist the company in their missed appointment rate?

8 A. Yes.

9 Q. In your reviews from '86 to the present time,
10 have you found any instances of misuse as described in
11 number two?

12 A. No, not on reviews.

13 Q. Number three, "A trouble report associated with
14 service order activity cannot be excluded if the service
15 order has been completed." Have you found any instances
16 between '86 and '92 or presently, excuse me, of that
17 occurring?

18 A. There has been a change in this practice on this
19 item. The practice originally stated that we could
20 exclude a trouble report if it was received prior to
21 midnight of the due date of the service order.

22 That caused a problem in that if we screened the
23 report the next day, we didn't have anything to fix the
24 customer's trouble with. The trouble report was gone even
25 though the trouble hadn't been fixed.

1 We've since changed the practice to read if the
2 service order is still active in the system, we will
3 exclude the trouble report and work the trouble from the
4 service order.

5 Q. Is there anyway to attach that report to the
6 service order request?

7 A. No.

8 Q. How does the ST going out to install that service
9 know there was a trouble reported on that line?

10 A. The service order is what generated the trouble
11 report. Billing has not started on that customer's line
12 yet. See, we cannot issue a trouble report because the
13 customer might be getting rebated and they don't even have
14 service yet.

15 Q. Do you know of any instances of individuals
16 improperly excluding out-of-service reports to effect the
17 PSC index?

18 A. No.

19 Q. Look at Section C if you would please. Section C
20 says "CPE Codes." Are those the inside wire codes?

21 A. Yes.

22 Q. Are those generally the twelve hundred and
23 thirteen hundred disposition codes?

24 A. At that time, yes.

25 Q. Are they still twelve and thirteen hundred codes?

1 A. We only have twelve hundred's now.

2 Q. Under reviewers hints. It says, "All CPE codes,
3 must have a close narrative explicitly isolating the
4 trouble causing condition to the customer's equipment or
5 wiring." In the reviews that you have done between 1986
6 and present, have you found any problems with number one?

7 A. No. No.

8 Q. In the reviews other than the one you spoke of to
9 the Attorney General --

10 A. Again, that was not a review.

11 Q. Okay. In any of the reviews that you have done,
12 have you found any instances of twelve hundred codes being
13 closed or reports being closed to twelve hundred codes
14 where the other information on the report clearly
15 indicated that the problem was an outside problem?

16 A. No.

17 Q. In any of the work that you have done daily
18 reviews or any other work that you have done looking at
19 trouble reports processed by maintenance centers, have you
20 found any instances of twelve hundred codes being used
21 when they did not apply?

22 A. Any is a big term. You're talking one?

23 Q. Let's make it more specific. Have you found
24 significant numbers or a number that would raise a
25 question in your mind as to why the IMC is following that

1 particular practice?

2 MR. BEATTY: Is that a question of integrity or
3 just a question?

4 MS. RICHARDSON: Basically what I'm trying to get
5 at, I guess, is improper activity. I'm really trying
6 to reach for improper activity, accidental, misuse,
7 general mistakes, retraining that the company may
8 consider.

9 When they see five out of ten of those employees
10 doing it this way, the company might consider that a
11 retraining problem where someone else looking at it
12 may look at it as an initial training problem or bad
13 instruction other than just isolated retraining
14 for a particular MA. They didn't get it right. They
15 still don't understand or accidental miscoding.

16 A. No.

17 Q. You've never found an incident of the twelve
18 hundred code being misused other than the isolated
19 instances?

20 A. Well, during a review?

21 Q. Can we come up with a name I can use for your
22 other review type work so I can continue to ask you
23 questions based on the formal reviews. Plus can you
24 qualify or give me a noun or an adjective so you and I are
25 talking about the same thing.

1 A. Review is one of my responsibilities.

2 Q. Yes.

3 A. The rest of my job is basically the other
4 responsibilities where I look for particular procedural
5 problems that might even have to do with how a trouble is
6 handled, where we're not doing a good job with a customer
7 and that needs to be corrected.

8 I'm always looking for stuff like that in order
9 to handle a trouble report better and how to handle a
10 service report better and so on.

11 Q. Can we call it daily work?

12 A. That would be good.

13 Q. Have you found any instances in your daily work
14 where inside wire codes were used when the problem was not
15 inside wire?

16 A. Only in the West Palm Beach instance.

17 Q. And that was the one you spoke of to the Attorney
18 General?

19 A. Correct.

20 Q. If you could look at Section D for me. Section D
21 "Out-of-Service Statusing." When is it determined that a
22 report is out-of-service?

23 A. We have two best ways of doing it. The initial
24 VER type code if they match a certain criteria will be
25 scored out-of-service. Those troubles that are sent to an

1 MA for screening, that person decides whether the customer
2 has lost the ability to make or receive a call. That's
3 the two.

4 Q. When you say VER code, V-E-R stands for
5 verification?

6 A. It's an initial test that comes from the multiple
7 line test system.

8 Q. Has that procedure been changed by the company
9 recently?

10 A. Yes.

11 Q. And what is the procedure today?

12 A. We ask the customer whether they perceive
13 themselves to be out-of-service or not.

14 Q. And in terms of autoscreening or automatically
15 statusing using the VER codes, has that changed?

16 A. That's gone.

17 Q. Autoscreener is no longer in use?

18 A. Autoscreener is in use but autoscreening is gone.

19 Q. Are there any reports that flow -- any
20 out-of-service reports that flow directly from
21 autoscreener to dispatch today?

22 A. Oh, yes.

23 Q. Then in what manner do those reports get statused
24 out as out-of-service?

25 A. By the CRSAB and the customer's request.

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1 Q. In terms of the reviewers hints under this
2 document it say number one, "Test narratives should be on
3 all reports manually tested by the maintenance center.
4 Test narratives which state an out of service condition
5 existed at the time of the test must have an out of
6 service RSLT code." Is that a result code?

7 A. Yes.

8 Q. Have you found any instances in the past in your
9 reviews where out-of-service reports were not statused up
10 front but held to be statused until close out?

11 A. At times, yes. Years ago.

12 Q. I'd like you to tell me about that.

13 A. It's been a long time and I can't be real
14 specific on where it was found. It was just a thing we
15 found and we stopped people from doing it.

16 Q. When you say you stopped them, does that -- I
17 infer from that that it was an improper activity.

18 A. It inferred we were doing an improper job of
19 testing.

20 Q. Did you draw any conclusions as to whether or not
21 the statusing of out-of-service was being done at the end
22 of the report, was being done to effect the PSC index?

23 A. In one occasion, yes.

24 Q. Again, in that particular case do you know who
25 was involved?

1 A. It was in the North Dade maintenance center and I
2 know that the second level manager's name was
3 (phonetic) but I don't know how much of his involvement
4 was in the statusing of trouble reports.

5 Q. In your daily work have you found any instances
6 of this number one occurring?

7 A. No.

8 Q. On the customer reports that were produced prior
9 to 1990, was there an indication on the report other than
10 the result code that indicated that that report was
11 out-of-service?

12 A. No. Oh, wait a minute. No. That was the result
13 code. No. You have the result code.

14 Q. If the result code did not indicate an
15 out-of-service condition, was it still possible for that
16 report to have been out-of-serviced or statused
17 out-of-service on close out?

18 A. Yes.

19 Q. Did you find any or did you in your daily work --
20 Let me ask it a different way. How could you tell on
21 looking at a delay then whether or not that report had
22 been out-of-service or statused out-of-service on close
23 out?

24 A. You would have the three zeros on the result
25 code.

1 Q. Could that not be a S-A-B report?

2 A. The SAB does carry three zeros but that's not the
3 final line of status.

4 Q. Number two, "Reports manually or scored as out of
5 service should qualify as per the definition in the
6 practice. Reports concerning custom calling features,
7 test OK's where the VER code does not indicate an out of
8 service condition existed at the time of test, etc." should
9 not be scored out of service unless test or close
10 narratives indicate otherwise. An examine of this would
11 be a central office failure." In your reviews have you
12 found any instances of this occurring?

13 A. No, only in the North Dade review.

14 Q. Is that the same review that you told me about
15 earlier?

16 A. Did we talk about that one just a few minutes
17 ago, yes.

18 Q. Was that the review where they were taking test
19 okays and closing them out-of-service?

20 A. Yes.

21 Q. Have you found any instances of that occurring in
22 your daily work?

23 A. You're talking about one trouble or --

24 Q. Instances that would indicated improper activity
25 occurring in that particular division.

1 A. No.

2 Q. Did you participate in the statewide review on
3 the particular problem of test okays being closed out as
4 out-of-service?

5 A. Was this by internal audits?

6 Q. No. Well, I shouldn't say that. This occurred
7 after the North Dade I think.

8 A. Yes.

9 Q. Did you participate in that one?

10 A. Yes.

11 Q. This was a staff review?

12 A. Yes.

13 Q. What were the conclusions drawn from that review?

14 A. I don't remember. I can't tell you what the
15 results were on it to be honest.

16 Q. Do you recall whether or not other divisions were
17 following the same procedure as (phonetic) and
18 closing them out as out-of-service?

19 A. I remember we found discrepancies. I don't
20 remember. Some of them were very high percent. I don't
21 remember if that was the same problem that was encountered
22 or not.

23 Q. From that review did you draw any conclusions as
24 to whether or not this was an improper activity done
25 deliberately or just merely something that needed

1 retraining?

2 A. No.

3 Q. Section D, "Not Out-of-Service Statusing" part
4 three. "RSLT Indicates OOS - Stat not OOS. What is that;
5 is that different?

6 A. No.

7 Q. Can you explain that to me.

8 A. The result code has the first two characters. If
9 it's a one, it's out-of-service. If it's a nine, it's not
10 out-of-service. The second digit indicates an opening in
11 the ground a short or whatever.

12 What we did is take any result code that had a
13 nine as a first digit and the second digit was a one two
14 or three, I believe which indicates a possible over short
15 or ground pull.

16 These reports look at narratives, the test
17 narratives to see if they should have been scored
18 out-of-service.

19 Q. Did you find any evidence of improper activity in
20 this area in the reviews that you did between 1986 and
21 present?

22 A. No.

23 Q. Did you find any evidence of improper activities
24 in your daily work between that period of time?

25 A. No.

1 Q. Section E is "No-Access Statusing."

2 A. Yes.

3 Q. We discussed no access, didn't we?

4 A. I think we did.

5 Q. Do you know if any changes have been made in this
6 section under reviewers hints in the 1992 version?

7 A. Verses?

8 Q. The earlier version.

9 A. The earlier versions, I can't say for sure.

10 Q. Under number one, "Was the trouble report
11 dispatched on the appointment date and time?" Why would
12 that matter; why would you look at that?

13 A. It's just for administration of the bureau.

14 Q. How does that effect administration of the
15 bureau?

16 A. We set up our appointments by the location and
17 manpower that we have.

18 Q. Yes.

19 A. And we're putting appointments way out just to be
20 safe. Of course, we want to give the customers the best
21 appointment possible. If we give them three days, we're
22 going two days ahead of time. We should have our
23 appointments in that two days and tell the customer we'll
24 be out there in a day.

25 And it's just administration of bureau. It has

1 nothing to do with any regulatory results or anything
2 else. This review looks at a lot more than just
3 regulatory items.

4 Q. Under number -- Let me see. Number three, it
5 indicates that there are two no access codes, an NOA vs
6 NAS code and it indicates that the NAS will stop a report
7 from scoring as a missed appointment. Will it also stop
8 the clock on the twenty-four hour index?

9 A. No.

10 Q. Has that always been the case?

11 A. No.

12 Q. Prior to 1992 would an NAS stop the clock, the
13 twenty-four hour clock on an out-of-service report?

14 A. You're talking the Public Service Commission
15 report, it will exclude it from the Public Service
16 Commission report.

17 Q. Do you know of any instances of no access reports
18 being no accessed before dispatch?

19 A. Through my reviews, no.

20 Q. What about through your daily work?

21 A. No.

22 Q. Have you ever seen any instances of
23 out-of-service reports being no accessed in your opinion
24 to effect the PSC index?

25 A. I have seen them in another review in another

1 area.

2 Q. Would you tell me about that please.

3 A. In south area I worked with Hampton Booker was my
4 counterpart down there doing the reviews. And he found a
5 case a few years back where the maintenance center had a
6 fictitious crew in their system. And they would dispatch
7 a trouble report to that crew, show it no access, and then
8 put it back out for PDO. And in that way you didn't take
9 a missed appointment on it.

10 Q. When you stay PDO, pending dispatch out?

11 A. They would take it and PDO it, yes.

12 Q. How could you tell -- How did he pick it up that
13 it was a fictitious crew?

14 A. I believe he got the numbers and again, this is
15 hearsay. I believe he got the numbers of the crews that
16 were assigned people and found that this one was not on
17 the list with names.

18 Q. So he was checking names with employee codes?

19 A. Well, every employee code should have a name.

20 Q. So did he find employee codes that didn't have
21 names attached?

22 A. Yes.

23 Q. Can you tell me where this was occurring?

24 A. I believe it was in central Dade. I'm not sure.

25 Q. Can you tell me when approximately this occurred?

1 A. Back in the 80s, late 80s.

2 Q. Late 80s?

3 A. Yeah.

4 Q. Can you tell me or do you know which managers
5 were involved in this?

6 A. No.

7 Q. In your opinion was this to effect the PSC
8 results?

9 A. It would have an effect. I don't know if it was
10 done for that.

11 Q. Do you know if any investigation followed Mr.
12 Booker's findings?

13 A. I didn't investigate. It was in discussion with
14 Mr. Booker.

15 Q. Do you know if any investigation followed his
16 review of that?

17 A. No.

18 Q. Was that a formal review?

19 A. It wasn't their review.

20 Q. Was it a formal investigation of this review?

21 A. Yes.

22 Q. Number -- Let me see. Number five indicates that
23 there is a practice that documents the use of the
24 disposition codes 1207 for closing no access reports and
25 then, "All other no access procedures are valid." I'm not

1 sure, is it suppose to be all other no access procedures
2 are not valid?

3 A. Should be invalid.

4 Q. So it should be not valid?

5 A. Wait a minute. I'm sorry.

6 Q. Is it correct the way it is?

7 A. What we're saying there is the use of 1207 has
8 been superseded. We limited the 1207.

9 Q. What is the 1207 used for?

10 A. If we no accessed a report and sat in the bureau
11 for 'X' amount of time and we didn't hear from the
12 customer, we closed it out to a 1207.

13 Q. Was that the twelve hundred disposition codes
14 that were inside wire codes?

15 A. Yes.

16 Q. Do you know of any instances of the misuse of the
17 1207 code in any of your reviews?

18 A. No.

19 Q. How about in any of your daily work?

20 A. No.

21 Q. Section F indicates on this "Non-Network codes."

22 A. Uh-huh.

23 Q. Essentially is a non-network regulated or
24 deregulated?

25 A. Deregulated.

1 Q. And number two indicates, "The use of disposition
2 codes 01XX is reserved for use on service orders and will
3 be scored as an error if used on a trouble report." In
4 your reviews between '86 and present, have you found any
5 misuse, improper use of the 01XX code?

6 A. No.

7 Q. In your daily work have you found any misuse of
8 that code?

9 A. No.

10 Q. Prior to this document coming out, was the 01XX
11 code used for customer trouble reports?

12 A. It's used on customer trouble reports for
13 corporate troubles. It's not used in the network in the
14 IMC for trouble reports.

15 Q. Under Section F, would any of the reports that
16 you look at under this section have any impact on any of
17 the PSC indexes?

18 A. What was that again?

19 Q. If you were to find or check into network codes,
20 could those codes be used or misused to impact PSC
21 reports?

22 A. Yes.

23 Q. Have you found any instances of these codes being
24 used or misused to impact PSC reports?

25 A. No.

1 Q. In your daily work have you found that?

2 A. No.

3 Q. And then in your review have you found that?

4 A. No.

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

6 A. No.

7 Q. I'd like you to look at "Cause Codes" Section H.

8 A. Okay.

9 Q. Under the example number two they mention, "320
10 multiple cable failure, is used with cable failures cause
11 by sheath problem, cable support hardware, etc. Use of
12 this code on DLC failures or other problems not associated
13 with cable failures should be scored as an error."

14 In any of your review work between '86 and present, have
15 you found any use of the 320 code?

16 A. Not misuse. I have found it used in error. The
17 multiple cable failure to me was an misnomer on the
18 particular title of it. We've since retitled it to
19 something else. I don't remember what. A craft person
20 can get very confused on this.

21 Q. Do you know if the use of the 320 code exempted
22 out-of-service reports in being counted as a miss in the
23 out-of-service over twenty-four hour index?

24 A. Yes, they did.

25 Q. In your daily work did you ever find reports

1 being closed to the 320 code that lead you to believe that
2 it may have been used to impact the PSC results?

3 A. No.

4 Q. Did you find any instances of the 320 code being
5 used to impact results?

6 A. No.

7 Q. Have you heard of that being done?

8 A. No.

9 Q. Under that also it indicates "Cause Code 420
10 Moisture" and it defines specifically when it applies,
11 "rain, dew, humidity, condensation, etc. If a cable gets
12 wet because of a taped opening, splice case failure,
13 gaffed cable, etc., the report should not be closed to
14 moisture." Is that a new change?

15 A. I think we made that change a couple of years ago
16 around '92. I believe that was added.

17 Q. Do you know why that was added?

18 A. Just to clarify the cause code itself and the use
19 of.

20 Q. Do you know if there was any confusion in the use
21 of the code?

22 A. Yes, there was.

23 Q. Do you know if there was any abuse of the use of
24 that 420 code?

25 A. Not with all the confusion we had. I can't tell

1 you abuse from confusion.

2 Q. Do you know if it impacted PSC result?

3 A. Yes, it did.

4 Q. Prior to 1992 were individuals closing reports
5 that had been caused by spliced cables, etc. to the 420
6 code?

7 A. I don't know.

8 Q. Did you do any reviews of that in your daily
9 work?

10 A. No.

11 Q. Have you done any reviews of that since 1986 in
12 your formal review?

13 A. Since '86?

14 Q. Yes.

15 A. We've done this review.

16 Q. Since 1992 with the brand new reviews, have you
17 done any reviews of this particular item of the 420 codes
18 on your formal review?

19 A. No. I don't believe it was on the formal review.
20 I don't remember.

21 Q. Have you done any since 1992?

22 A. Yes.

23 Q. Have you found any problems with the use of the
24 420 code since this change?

25 A. No.

1 Q. In terms of cause codes, did you find any
2 problems with the use of any other cause code that may
3 have impacted PSC in any of the formal reviews you have
4 done since 1986?

5 A. No.

6 Q. How about your daily work?

7 A. No.

8 (Thereupon, after a recess was taken the
9 following proceeds were had.)

10 Q. Mr. Fecht, I'm going to show you Citizens third
11 set of Interrogatories dated June 6, 1991. We basically
12 asked the company to give us the names of employees who
13 had information about certain items.

14 This item that I'm going to show you asks for
15 information about employees who knew about customer
16 reports being designated employee reports, improperly
17 designated as employee reports.

18 The company responded with the names of employees
19 who might have some information about the creation of
20 employee originated reports for customers who called or
21 were called concerning repeat problems.

22 We'll go off the record and you will have a
23 change to look at that.

24 (Thereupon, an off the record discussion was
25 held.)

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Q.

A.

Q. Do you have any knowledge other than what you've testified to regarding I believe it was Indian River about the creation of employee originated reports, improper creation of employee originated reports?

A. In lieu of customer direct reports?

Q. Well, in terms of what the company has identified here for customers who called or were called concerning repeat problems?

A. No.

Q. The Indian River incident occurred in 19 --

A. '93.

Q. -- '93.

Do you know of any instances of improper creation of employee originated reports instead of customer direct reports?

MS. WHITE: The company responded in February of '93.

MS. RICHARDSON: The company responded in February of '93. Thank you, Ms. White. We asked the question in '91.

1 Q. Do you have any other information?

2 A. No.

3 Q. Your statement was given to the company before
4 1993; is that correct?

5 A. Yes.

6 Q. Did you give any statement to the company in
7 1993?

8 A. When you say company, what do you mean company?

9 Q. In terms of being interviewed in relation to your
10 knowledge of the investigation in the handling of repair
11 reports.

12 A. You're talking about the Indian River incident?

13 MR. BEATTY: Just a minute.

14 Q. That's all right. Let me move on. From the same
15 document there's a listed under another
16 question. We basically asked for any employee that had
17 information or knowledge about records of extending time
18 for repairs that were granted by a customer when the
19 customer was not contacted.

20

21

22 We'll go off the record and let you look at
23 this document and then I'll have some questions about it.

24 Q.

25 A.

1 Q. Other than what we may have already talked about,
2 do you have any information about the misuse of CON code?

3 A. No.

4 Q. In terms of your review work from 1986 through
5 the present time and other than any information you have
6 already given me, do you know of any instances of
7 falsification of customer trouble reports?

8 A. That's kind of vague.

9 Q. It's very broad and it's deliberately broad in
10 general.

11 A. No.

12 Q. Mr. Fecht, at this time I don't think I've got
13 anymore. We have one more. Excuse me. Do you recall
14 being present at a meeting, I think, in this room with Mr.
15 Rupe regarding a review that was done -- Let me take a
16 minute.

17 Do you recall a meeting in this room with Mr.
18 Rupe at any time conducting or going over a feedback of a
19 review on notes that were posted on maintenance
20 administrators' terminals instructing them not to status
21 out-of-service trouble reports?

22 A. God. That was years ago. I remember that coming
23 up in conversation. I did not find the notes. And I
24 don't remember who even brought it up to be honest with
25 you but I understand that was found.

1 Q. Did you know what happened as a result of that
2 finding?

3 A. No, I don't. I know that the notes were taken
4 down immediately but that's all I know.

5 Q. Do you know if any conclusions were drawn as to
6 whether or not that was a proper or improper activity?

7 A. No.

8 Q. I have no further questions. Thank you. 3

9 MR. VINSON: Mr. Fecht, I'd like to ask you a
10 general question if you could describe after the
11 reviews were conducted, the reviews we've been talking
12 about, what the process was in submitting the
13 findings of the reviews to the IMC management and
14 their response. If you could just describe that in
15 general please.

16 THE WITNESS: Which time frame?

17 MR. VINSON: Let's talk about the 1990 time frame
18 and before.

19 THE WITNESS: Okay. I pull the reports, go
20 through them for errors, go through those
21 errors with usually the maintenance center
22 manager and a couple of outside managers to verify
23 that we were all on board with the errors, write up
24 the reviews, feed it back to the operations manager
25 -- I'm sorry, the operations manager and the managers

1 in the maintenance center in the filed. And that was
2 basically the end of it.

3 MR. VINSON: Was there any follow-up to see if
4 any corrective action was taken in problems that had
5 been found in the review?

6 THE WITNESS: No. Just a re-review whenever they
7 came around.

8 MR. VINSON: You mean the next regularly
9 scheduled or the next review that would come up for
10 that maintenance center?

11 THE WITNESS: Correct.

12 MR. VINSON: Was there any process where a review
13 was found to have shown some problems at a maintenance
14 center to come back within a certain period of time
15 for another review?

16 THE WITNESS: No.

17 MR. VINSON: It would just be on the same
18 scheduling basis as they normally were?

19 THE WITNESS: Yes.

20 MR. VINSON: Thank you. That's the only question
21 I have.

22 CROSS EXAMINATION

23 BY MR. BEATTY:

24 Q. When during the course of a review you detect a
25 problem in the maintenance center is there ever an

1 occasion, and this is a follow-up on Mr. Vinson's
2 question, when you will go back into that particular
3 maintenance center to do a follow-up analysis of that
4 problem area?

5 A. Are you talking prior to '92?

6 Q. Prior to '92.

7 A. No.

8 Q. Today is there such a procedure?

9 A. We are right now directed to do two reviews per
10 maintenance center per year. In the current package there
11 is not a stipulation to go back and look at a specific
12 item within a specific time.

13 Q. Are you talking about reviews or going back in to
14 do a subsequent review of the problem area?

15 A. Correct.

16 Q. Let's set aside reviews for a second and let's
17 talk about doing a follow-up on a problem area. Has there
18 ever been a time after having discovering a problem in an
19 operation review or any kind of review that you would go
20 back into the maintenance center to take another look
21 whether it was called a review or analysis or regardless
22 of the terminology used?

23 A. Yes.

24 Q. Before 1992 was that the procedure?

25 A. No.

1 Q. When did that procedure first come into
2 existence?

3 A. In the '92 time frame.

4 REDIRECT EXAMINATION

5 BY MS. RICHARDSON:

6 Q. Do you know why that procedure was instituted in
7 '92?

8 A. They felt that there wasn't enough importance
9 being put on the reviews prior to '92.

10 Q. Do you know if that was at all a result of the
11 Attorney General's investigation?

12 A. I'm sure that had an effect on it. Can I say
13 something?

14 Q. Yes.

15 A. The Attorney General's investigation was started
16 because of corrective action that we had taken against
17 people we found cheating within the company.

18 Q. Are you referring to an earlier incident that you
19 have already spoken of today?

20 A. Yes. The repair portion of this investigation.

21 Q. Was that 1991?

22 A. North Dade.

23 Q. North Dade incident. That was before '91, wasn't
24 it?

25 A. Yeah.

1 Q. Do you know why the company did their own
2 internal investigation in 1991?

3 MR. BEATTY: Objection to the form of the
4 question. The questions calls for information within
5 the scope of attorney client privilege and possibly
6 the attorney product doctrine. Accordingly, I would
7 request the witness not to respond unless you have an
8 independent knowledge of why that investigation was
9 conducted.

10 A. No, I don't.

11 Q. So you're not answering based on counsel's
12 instruction?

13 A. Yes.

14 MR. BEATTY: Counsel did not instruct. I
15 requested.

16 A. I don't have any knowledge.

17 Q. All right Mr. Fecht. Thank you very much. And
18 we'll move on to the next person.

19 (Whereupon, the deposition was
20 concluded at 3:10 o'clock p.m.)

21 AND FURTHER DEPONENT SAITH NOT.
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STATE OF FLORIDA)
) SS
COUNTY OF BROWARD)

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Witness

SWORN to and SUBSCRIBED before me this
_____ day of _____, 1993, in the
City of Fort Lauderdale, County of
Broward, State of Florida.

Notary Public,
State of Florida at Large

My Commission Expires:

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CERTIFICATE

STATE OF FLORIDA)
) SS
COUNTY OF BROWARD)

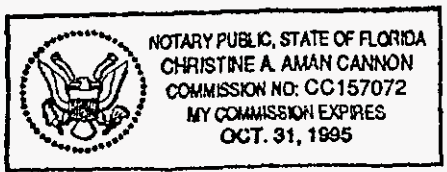
I, CHRISTINE A. AMAN CANNON, a Notary Public in and for the State of Florida at Large:

DO HEREBY CERTIFY that the foregoing deposition was taken before me at the time and place therein designated; that the deponent was by me duly sworn; that my shorthand notes were thereafter reduced to typewriting under my supervision; and the foregoing pages 1 through 68 inclusive, are a true and correct record of the testimony given by the witness.

I FURTHER CERTIFY that I am not a relative or employee of any of the parties, nor relative or employee of such attorney or counsel, or financially interested in the foregoing action.

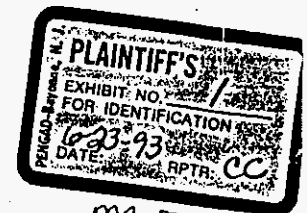
WITNESS MY HAND AND SEAL this 5th day of August, 1993, in the City of Fort Lauderdale, County of Broward, State of Florida.

Christine A. Aman Cannon
CHRISTINE A. AMAN CANNON,
Notary Public,
State of Florida at Large

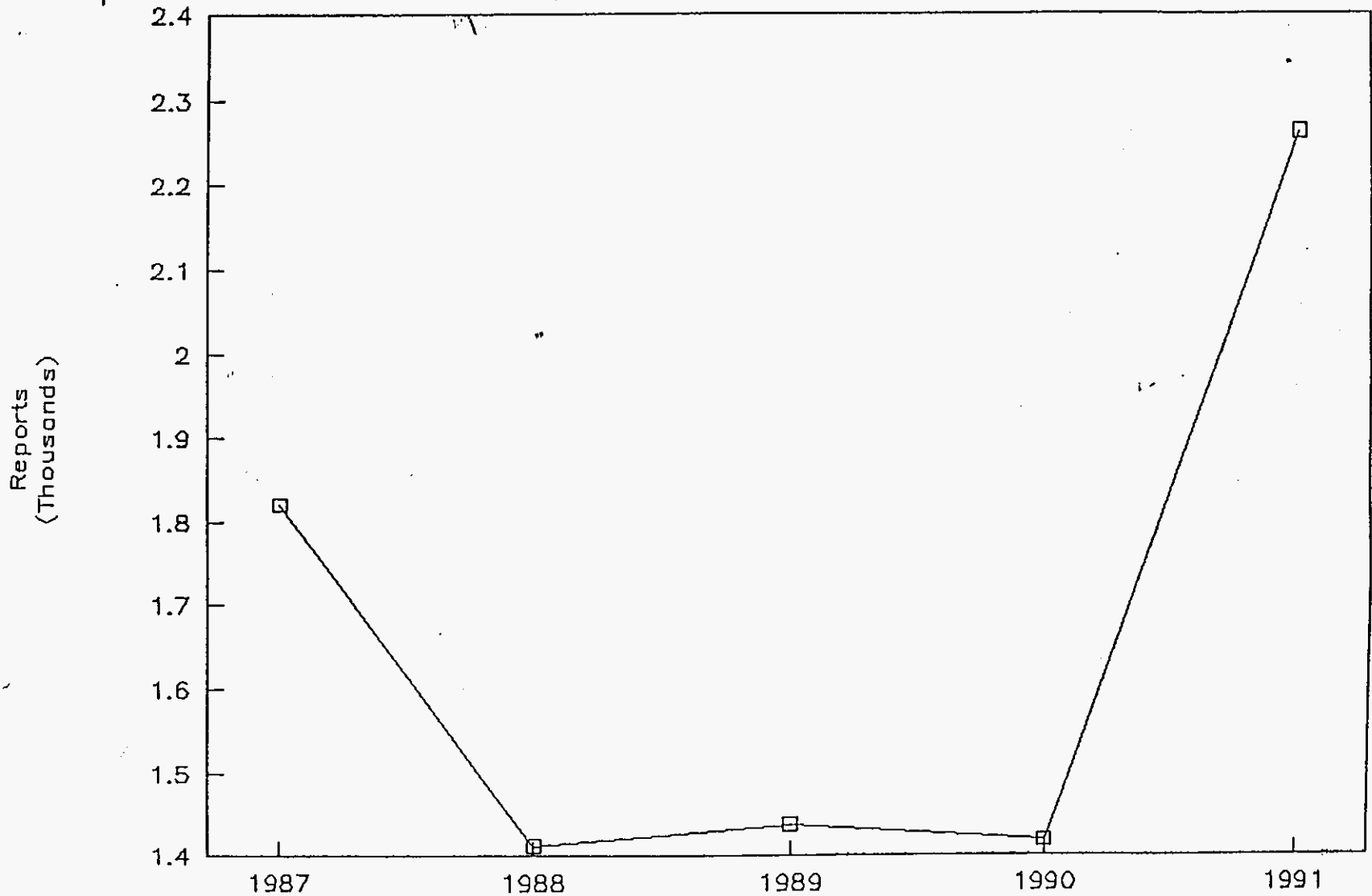


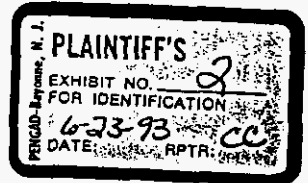
YEARLY AVERAGE >24 HOURS OOS REPORTS

Source: Schedule 11a



MR Fecht





MR Fecht's depo

STANDARDIZATION

AND

COMPLIANCE REVIEW

DIVISION NAME: _____

PERIOD COVERED: FROM: _____
TO: _____

PRIMARY REVIEWERS NAME: _____

PHONE NUMBER: (____) _____ - _____

FEED BACK DATE: _____

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SECTION A

EMPLOYEE REPORTS

This section looks at employee reports. Excluded are ITE generated service orders, Official Services, and all Coin classes of service.

Source documentation:

660-169-011BT Issue D, January, 1992

660-169-013BT Issue H, January, 1992

REVIEWERS HINTS:

1. Proper documentation is required in the trouble narrative to substantiate the employee report. This must include the department and the initials of the employee reporting the trouble if different than the employee entering the report. Reports not having the required information will be scored as errors.

2. Employee reports issued for reasons other than those described in the practice will be scored as errors.

EXAMPLES:

Employee reports issued to complete repairs on an existing trouble report.

Employee reports issued to clear a customer trouble report and the original report was excluded. This includes employee reports issued to complete/repair installation orders. These type of troubles should be cleared on the service order.

Employee reports issued to clear multiple troubles on a customer report. This includes reports issued to install network interfaces while on repair visits.

Employee reports issued when a trouble report is received on a special call-back number located in the district/turf given to the customer on a repair or installation visit, previous no-access, or on a repeat report reduction plan.

SECTION A
EMPLOYEE REPORTS

USE MTAS 686-30

CRITERIA: CAT=4&CS*=08;09;11;14;18;19&TLCP=N&FTYP*=897;898;899&RSA*=007

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____
NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION B
EXCLUDED REPORTS

This section looks at excluded reports. Excluded are ITE generated service orders, Official Services, and all Coin classes of service.

Source documentation:

660-169-011BT Issue D, January, 1992

660-169-012BT Issue F, January, 1992

REVIEWERS HINTS:

1. Close narratives must substantiate the exclude. Only those reasons given in the practice are valid excludes and close narratives must include at least the information given in the examples.

 2. As per 660-169-012BT, par. 3.1, A change of appointment for Company reasons to a later time than originally given the customer shall be considered a Missed Appointment. If the appointment is changed, a Customer Direct report will be used. DO NOT use a CX subsequent to change appointment. Any change of appointment by other than the customer through the CRSAB, must be documented.

 3. A trouble report associated with service order activity cannot be excluded if the service order has been completed. A report excluded for service order activity will require verification of the date and time the order was completed.
- "O" routed service orders will have an ITE employee report associated with the trouble report. This should be sufficient documentation to justify the exclusion. If further verification is required, the SHAK number and completion date can be obtained by requesting the '/FOR IFSTQT' mask and inputting the NPA and TN. When the SHAK number and date are known, request the '/FOR IFSTQU' mask. Input the Completion Date, NPA, Telephone Number, and SHAK number. This additional information should help in determining the validity of the exclude.
- "M" route or automatic completion orders without errors complete at 5:00 PM on the due date.

SECTION B

PART 1

EXCLUDED REPORTS - LEAD TICKET ONLY

USE MTAS 686-31

CRITERIA: CAT=6&CS*=08;09;11;14;18;19&TLCP=N<=0&FTYP*=897;
898;899&RSA*=007

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION B

PART 2

EXCLUDED REPORTS

NOT LEAD TICKET - NOT ISSUED BY CRSAB

USE MTAS 686-32

CRITERIA: CAT=6&CS*=08;09;11;14;18;19&TLCP=N<=1&RSA>=580

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION C

CPE CODES

This section looks at all CPE disposition codes. It excludes No-Accessed reports, Official Services, and all Coin classes of service.

Source documentation:

660-169-013BT Issue H, January, 1992

REVIEWERS HINTS

1. All CPE codes must have a close narrative explicitly isolating the trouble causing condition to the customer's equipment/wiring. Isolation of the trouble will include CUSTOMER NOTIFICATION for close out purposes.

SECTION C

CPE CODES

USE MTAS 686-33

CRITERIA: CAT=1&SUB=0&AR=0&CS*-08;09;11;14;18;19&TLCP=M&DISP
=12&NA=0

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION D
OUT OF SERVICE STATUSING

This section looks at out of service statusing. It excludes Official Services, Disposition code 07XX, all Coin classes of service, and those reports statused out of service by auto screen.

Source documentation:

660-169-012BT Issue F, January, 1992

REVIEWERS HINTS

1. Test narratives should be on all reports manually tested by the maintenance center. Test narratives which state an out of service condition existed at the time of the test must have an out of service RSLT code.

2. Reports manually scored as out of service should qualify as per the definition in the practice. Reports concerning custom calling features, test OK's where the VER code does not indicate an out of service condition existed at the time of test, etc., should not be scored out of service unless test or close narratives indicate otherwise. An example of this would be a central office failure. These reports will probably test OK per MLT but should be scored out of service if the customer has lost the ability to receive or originate calls.

SECTION D

PART 1

MANUAL OUT OF SERVICE STATUSING

USE MTAS 686-34

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N&SP*=
299&OOS=1&DISP*=07

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION D

PART 2

OUT OF SERVICE STATUSING

TEST OK

USE MTAS 686-35

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N&OOS=1&DISP=07&SP*=299

TOTAL IN CATEGORY: _____

NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____

% DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION D

PART 3

NOT OUT OF SERVICE STATUSING

RSLT INDICATES OOS - STAT NOT OOS

USE MTAS 686-36

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&'440,1'=1;2
;3&'439,1'*=1&SP*-299&OOS=0

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION E

NO-ACCESS STATUSING

This section looks at no-access statusing by maintenance center personnel. It excluded Official Services, and all Coin classes of service.

Source documentation:

660-169-012BT Issue H, January 1992

660-169-314SV Issue B, March, 1989

REVIEWERS HINTS

1. Was the trouble report dispatched on the appointment date and time? Be sure to check the before and after fields in the trouble narrative. These will be filled if the customer has requested a specific time for access.

2. In some cases it may be beneficial to dispatch a report of trouble before the appointment date. This may be due to extended appointments on out of service reports, bulk type reports, etc. Where possible, the customer should be contacted and advised of the earlier appointment to reduce the possibility of additional no accesses.

3. Be sure the proper no-access code is used. (NAO vs NAS)

The NAS status will stop a report from scoring as a missed appointment. Be sure this status code is being used properly by the IMC. A more detailed look may be necessary if problems are suspected.

4. The vehicle for new appointments on no-accessed reports is the subsequent report. If a report is closed by the IMC and a subsequent report was received indicating a new appointment and existing trouble, be sure the close narrative states the customer was contacted and agrees with the final disposition. If the close narrative indicates the report was closed without regard to the subsequent report, score an error.

5. 660-169-314SV documents the use of Disposition Coded 1207 for closing no access reports in the IMC. 660-169-013BT supersedes this Disposition Code. All other no access procedures are valid.

6. Be sure 3rd party reports are being handled properly. This can become a problem if billing is involved.

7. Be sure reports are being held the proper amount of time before closing. Failure to do so will result in an error. You may want to look at the day reports are closed vs how many repeat. Reports closed on Friday, Saturday, Sunday and Monday, usually repeat at a higher rate than those closed out during the week.

SECTION E
NO-ACCESS STATUSING

USE MTAS 686-37

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N&NA=1

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION F
NON-NETWORK CODES

This section looks at all customer direct reports closed to non-network disposition codes. Disposition Codes other than 03XX, 04XX, 05XX, 07XX, 08XX, 09XX. It excludes all Coin classes of service, Disposition Codes 12XX, and No access reports.

Source documentation:

660-169-013BT Issue H, January, 1992

REVIEWERS HINTS

1. Non-network codes, just like any other disposition require proper documentation in the close narrative for use.
2. The use of disposition 01XX is reserved for use on service orders and will be scored as an error if used on a trouble report.

SECTION F
NON-NETWORK CODES
USE MTAS 686-38

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N&N=1&
DISP*=12&NA=0

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION G
SSMMP CLASSES OF SERVICE

This section looks at all SSMMP classes of service. It excludes coin classes of service.

Source documentation:

660-169-011BT Issue D, January, 1992

660-169-012BT Issue F, January, 1992

660-169-013BT Issue H, January, 1992

REVIEWERS HINTS

1. These trouble reports should be handled the same as any other type of trouble report in regard to coding. The only difference is the objective established for average clearing times. For this reason, particular care must be used when evaluating these reports. The clear date and time should be compared to the final status day and time for abnormally large intervals. These large intervals may happen occasionally, but should be documented as to why. If an excessive number of reports with abnormally large clear to FST intervals are found, the backing up of clearing times should be investigated. Subsequent reports issued by the CRSAB are issued in real time. Any status or clearing times prior to the subsequent but appearing after the receipt of the subsequent report on the DLETH is documented proof that times are being backed up.

2. Look for improperly excluded or closed reports. In some cases a new report may have been generated to complete repairs (particularly on weekends).

3. Dummy Line Records (Issued to clear trouble reports not tracked in IMOS) should not be issued as Customer Direct reports. Any Dummy reports that should have been issued as Category 1 reports should be scored as errors.

SECTION G

SSMMP CLASSES OF SERVICE

USE MTAS 686-39

CRITERIA: CAT=1&SUB=0&AR=0&TLCP=N&((CS=02;12;15;16;17)/(CS=2
1&'96,3'*=X2W;X4W))

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

SECTION H
CAUSE CODES

This section looks at Cause coding. It Excludes coin classes of service and no-access reports.

Source documentation:

660-169-013BT Issue, H, January, 1992

REVIEWERS HINTS

1. Cause coding relies for the most part on the information in the close narrative supplied by the person closing the report. If this information is not complete enough to determine the proper cause code, score the report as an error.
2. Some Cause Codes do not apply to certain Disposition codes.

Example:

Cause code 320 MULTIPLE CABLE FAILURE, is used with cable failures cause by sheath problem, cable support hardware, etc. Use of this code on DLC failures or other problems not associated with cable failures should be scored as an error.

Cause Code 420 MOISTURE, applies to trouble conditions caused by rain, dew, humidity, condensation, etc. If a cable gets wet because of a taped opening, splice case failure, gaffed cable, etc., the report should not be closed to moisture. The Cause Code should relate to what allowed the moisture to enter the cable.

SECTION H

PART 1-H

CAUSE CODES - PSC EXEMPT

FLORIDA USE ONLY

USE MTAS 686-40

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N& (('1
67,1'*=4)/('167,2'*=31;32;35;50)/(FCAS*=200;210;22
2;280;303;304))

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

S&C REVIEW 1992

F026327

0000110

SECTION H

PART 2-H

CAUSE CODES - NON-PSC EXEMPT

FLORIDA USE ONLY

USE MTAS 686-41

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N&'167
,1'*=4&'167,2'*=31;32;35;50&FCAS*=200;210;222;280;
303;304

TOTAL IN CATEGORY: _____

NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____

% DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

S&C REVIEW 1992

F035227

SECTION H
PART 3-H
CAUSE CODES
OTHER THAN FLORIDA

USE MTAS 686-42

CRITERIA: CAT=1&SUB=0&AR=0&CS*=08;09;11;14;18;19&TLCP=N

TOTAL IN CATEGORY: _____ NUMBER SAMPLED: _____

NUMBER DEVIATIONS: _____ % DEVIATIONS: _____

FINDINGS:

RECOMMENDATIONS:

S&C REVIEW 1992

5000007

DEFINITIONS FOR RESULT SHEET

1. TOTAL IN CATEGORY

The number of reports derived using the "00" MTAS report for the section being reviewed.

2. TOTAL SAMPLED

The number of "DLETH" pulled for analization for the section being reviewed.

3. NUMBER DEVIATIONS

The number of deviations found from the "DLETH" pulled for analization for the section being reviewed.

4. PERCENT DEVIATIONS

The percent of deviations found as compared to the number of "DLETH" pulled for analization for the section being reviewed.

DIVISION _____

PERIOD COVERED: _____ TO _____

	TOTAL IN CATAGORY	TOTAL SAMPLED	NUMBER DEVIATIONS	PERCENT DEVIATIONS
SECTION A EMP REPORTS	_____	_____	_____	_____
SECTION B EXCLUDED REPORTS				
PART 1	_____	_____	_____	_____
PART 2	_____	_____	_____	_____
TOTAL SECTION B	_____	_____	_____	_____
SECTION C CPE CODES	_____	_____	_____	_____
SECTION D OUT OF SERVICE				
PART 1	_____	_____	_____	_____
PART 2	_____	_____	_____	_____
PART 3	_____	_____	_____	_____
TOTAL SECTION D	_____	_____	_____	_____
SECTION E NO ACCESS	_____	_____	_____	_____
SECTION 7 NON-NETWORK CODES	_____	_____	_____	_____
SECTION G SSMMP	_____	_____	_____	_____
SECTION H CAUSE CODES				
PART 1	_____	_____	_____	_____
PART 2	_____	_____	_____	_____
PART 3	_____	_____	_____	_____
TOTAL SECTION H	_____	_____	_____	_____
OVERALL RESULT		_____	_____	_____

MTAS REPORTS
SCRATCH PAD 685

- 30. _____ EMPLOYEE REPORTS
- 31. _____ EXCLUDED REPORTS - LEAD TICKET ONLY
- 32. _____ EXCLUDED REPORTS - NOT LEAD TICKET - NOT
ISSUED BY CRSAB
- 33. _____ CPE CODES
- 34. _____ MANUAL OUT OF SERVICE STATUSING
- 35. _____ OUT OF SERVICE STATUSING - TEST OK
- 36. _____ NOT OUT OF SERVICE STATUSING
- 37. _____ NO-ACCESS STATUSING
- 38. _____ NON-NETWORK CODES
- 39. _____ SSMMP CLASSES OFSERVICE
- 40. _____ CAUSE CODES - PSC EXEMPT - FLORIDA ONLY
- 41. _____ CAUSE CODES - NON-PSC EXEMPT - FLORIDA ONLY
- 42. _____ CAUSE CODES - ALL OTHERS

STANDARDIZATION AND COMPLIANCE

REVIEW FEED BACK

DATE: _____

PLEASE PRINT

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

NAME: _____

TITLE: _____ DEPT: _____

PHONE: (_____) _____ - _____

S&C REVIEW 1992