

FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 910163-TL ⁹²⁰²⁶⁰⁻⁷

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

4:00 o'clock p.m.

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DEPOSITION

OF

LINDA MOSS

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DOCUMENT NUMBER-DATE

09505 SEP-28

RECORDER'S OFFICE

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Appearing on behalf of LINDA MOSS.

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305-970-3104

I N D E X

WITNESS
LINDA MOSS

DIRECT
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Deposition of LINDA MOSS, 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 23rd day of June, 1993, commencing at 4:00 o'clock p.m.

* * *

Thereupon:

LINDA MOSS

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. Would you please state your name and then spell it for the court reporter.

1 A. Linda C. Moss, M-O-S-S.

2 Q. Your address please.

3 A.

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

5 A.

6 Q. Is that a business address?

7 A. No, that's my residence.

8 Q. Do you have a phone number?

9 A. Yes. My work number is 786-0917.

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

11 A. Yes, I am.

12 Q. I'll ask her to put her appearance on the record.

13 MS. PIKE: Teresa Pike, appearing on behalf of
14 Linda Moss.

15 Q. Did you bring anyone else with you to this
16 deposition?

17 A. I brought the union representative, Mack Gorden.

18 Q. I'll ask Mr. Gorden to put his appearance on the
19 record.

20 MS. PIKE: State your name for the record, Mr.
21 Gorden.

22 MR. GORDEN: Mack Gorden, here on behalf of CWA
23 local 3104.

24 MS. RICHARDSON: Thank you Mr. Gorden. Mr.
25 Gorden, I guess in the interest of the fact that there

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are other parties in this case, would you please give a business address and a phone number for the record.

MR. GORDEN: 2131 Southwest 15th Street, Pompano, Florida, phone number 305-970-3104.

MS. RICHARDSON: Do you happen to know the zip code there. If you don't that's okay.

MR. GORDEN: No.

Q. Ms. Moss, have you discussed this deposition here today with anyone other than your attorney or counsel for Southern Bell?

A. Yeah.

Q. Who have you talked to?

A. Well, Wayne Tubaugh came in and briefed us that we would be coming before the whatever committee whatever this is that we would be giving our deposition. So we talked with him.

Q. Anyone else besides Mr. Tubaugh?

A. Well, the employees, you know, we've spoken among ourselves.

Q. Have you all talked about the questions and answers?

A. No, I haven't. I really haven't had time -- What my employees or my co-workers, no.

Q. Have you given a statement to the company in the past?

1 A. Uh-huh.

2 Q. Do you remember when you gave that?

3 A. No.

4 MS. PIKE: If I can interject, you need to
5 answer either yes or no for the benefit of the court
6 reporter because she doesn't know how to spell uh-huh.

7 Q. Was it a year ago, two years ago approximately.

8 A. I really don't know. I'm really bad when it
9 comes to time. I mean, you know, we've worked so much
10 since the hurricane that the days just -- I don't even
11 know what day it is half the time. We're in a seven day
12 office anyway and I kind of get confused.

13 MS. PIKE: If you don't know, tell her you don't
14 know.

15 A. Okay. I'm sorry. I really don't know.

16 Q. Do you know who was present at the time you gave
17 that statement?

18 A. No. I can't remember the names.

19 Q. Do you remember their positions?

20 A. I think they were attorneys for the company.

21 Q. Was someone from the union there?

22 A. I don't believe so. I mean, I don't know.

23 Q. Did you have an attorney present?

24 A. No.

25 Q. Has anyone advised you that you would not be

1 disciplined based upon whatever answers you give us here
2 today?

3 A. Yes.

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

7 A. Has anyone discussed with me the penalties that
8 would apply?

9 Q. If you perjured your testimony here today.

10 A. No. I haven't been advised. I know what perjury
11 is but I haven't been advised as to what consequences I
12 would face if I perjured myself.

13 Q. If at any time I ask you a question that you
14 don't understand and you want me to clarify, feel free to
15 ask me to do so. If at any time you want to ask your
16 attorney questions off the record, just tell me and we'll
17 stop the court reporter and you can have whatever
18 discussions you need to on that; is that okay?

19 A. Uh-huh.

20 Q. That's a yes?

21 A. Yes.

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

23 A. I'm a maintenance administrator.

24 Q. How long have you held that position?

25 A. Since February of '90.

1 Q. What were you before you became a maintenance
2 administrator?

3 A. A service representative in the business office.

4 Q. How long were you a service rep?

5 A. Thirteen years give or take a few.

6 Q. Why did you decide to become or did you decide to
7 become a maintenance administrator; was the move voluntary
8 on your part?

9 A. Yes.

10 Q. Why did you leave the business office?

11 A. I hated it there. No, I wanted to get out. I
12 mean, I wanted to be closer to home and I didn't like
13 sales.

14 Q. Did you like sales when you first started?

15 A. Yes. I would say -- I mean, thirteen -- Yeah, I
16 would say I enjoyed sales, yes.

17 Q. Did the nature of your work change while you were
18 a service representative in the business office in terms
19 of atmosphere or work environment?

20 MR. BEATTY: Objection, relevancy.

21 Q. Can you not answer or do you need further
22 clarification?

23 A. Clarify that for me, will you?

24 Q. What kind of sales did you conduct for the
25 business office while you were there?

1 A. When I started?

2 Q. Yes.

3 A. In January of '77 we were still in the phone
4 business so we sold phones.

5 Q. Did that --

6 A. And we sold features too, I suppose.

7 Q. Did that change in 1984 with the break up of
8 AT&T?

9 A. Yeah. It certainly did. Yeah, we no longer
10 handled sets.

11 Q. Did you receive any further sales training after
12 the break up of AT&T?

13 A. Yeah. Sales training has been an -- was an
14 ongoing thing.

15 Q. In your opinion is the sales training that you
16 received customer oriented?

17 A. Definitely.

18 MR. BEATTY: Objection, relevance.

19 Q. Do you feel that in any of the training that you
20 have received that any of it was directed as high pressure
21 sales?

22 MR. BEATTY: Objection, relevance. We have gone
23 far a stray outside the bounds of this docket and I
24 suggest that we move onto a more relevant subject
25 matter.

1 MS. PIKE: I join in that objection.

2 Q. You can still answer the question.

3 A. I forget the question.

4 Q. Has the sales become high pressure sales in the
5 last -- or since the break up of AT&T?

6 A. I think sales has always been a pressure. Sales
7 by nature is a pressure.

8 Q. Did you have quotas?

9 MR. BEATTY: Objection, relevance. Again, we're
10 going for outside the bounds of this docket and what
11 is relevant in this procedure. I would object to
12 this.

13 A. We've always had quotas.

14 Q. When you moved to become an administrator, did
15 you continue selling services and features for the
16 company?

17 A. No. No. I actually -- It was a referral
18 process. If we saw -- If I saw the need I would make
19 recommendations and refer them to the business office. We
20 were not involved. I can't say that I was involved in
21 sales per say. I did not perceive myself as a
22 salesperson, no.

23 Q. Did you participate in any of the sales
24 promotions or campaigns that the company had for
25 maintenance administrators?

1 A. I never won any prizes. I never cared about it.
2 I didn't care about sales at all.

3 Q. But did you participate at all?

4 A. The referrals program probably can be
5 considered --

6 Q. Part of the sales campaign?

7 A. Yeah. So yes, I guess I did.

8 Q. Do you know whether or not you received any
9 instructions to keep track of your time that you spent
10 selling with the customer as opposed to time you spent
11 helping them with a repair problem?

12 MR. BEATTY: This is in the network department
13 obviously.

14 A. No. I'm sure that there were people who did keep
15 track but I myself never did. And I can't recall ever
16 being instructed to keep track of such things, you know.

17 Q. When you were a maintenance administrator where
18 were you located? Which IMC were you working at?

19 A. I have always been at this one 1230 North
20 Federal.

21 Q. Who is your present first level supervisor?

22 A. Dennis Marshall.

23 Q. How long has he been your first level supervisor?

24 A. Gosh, I don't know. Again, I have a hard time
25 with times.

1 Q. About a year, do you have any idea?

2 A. Seems like longer than that. Maybe a year and a
3 half. I don't know.

4 Q. Do you know who it was before Mr. Marshall?

5 A. Don Schena. Again, I can't remember how long I
6 was with him either.

7 Q. Can you name any other first level supervisors
8 that you've had since you moved to Pompano as a
9 maintenance administrator in 1990?

10 A. I had Carla Lockerd. She was my first one.

11 Q. Can you name your second level supervisors in
12 Pompano as an MA?

13 A. Dennis Slattery.

14 Q. Is he the only one?

15 A. Yes.

16 Q. Who is your operations manager?

17 A. Bob Sattizahn.

18 Q. Has he been your operations manager the entire
19 time you've been an MA?

20 A. Yes.

21 Q. What kind of training did you receive for your
22 maintenance administrator position?

23 A. Well, I received on the job training. And I
24 went to classes, testing classes, different classes.

25 Q. What kinds of things or duties do you do as a

1 maintenance administrator?

2 A. I test customers' lines. I determine if the
3 problem is inside or outside, whether to dispatch out or
4 to refer it in.

5 Q. When you say refer it in, does that mean to the
6 central office?

7 A. Well, yes or to the translations people or the
8 switching people.

9 Q. Do you also close out trouble reports?

10 A. Yes, I do.

11 Q. Have you ever heard of the phrase "backing up the
12 time"?

13 A. Yes.

14 Q. What does that mean to you?

15 A. Well, that means that you close the time to the
16 time that it was actually cleared, when the problem was
17 actually fixed.

18 Q. Ms. Moss, I'm going to show you a document and
19 this is Citizens Third Set of Interrogatories. An
20 interrogatory is a question that I've put down in writing
21 and mailed to the company. And they've given me a written
22 response. This is dated June 6, 1991.

23 And I've asked the company to identify employees
24 who have knowledge about falsifying completion times on
25 repair reports. And the company has given me some names

1 of employees who might have some information about backing
2 up clearing time. What I'll do is, I'll go off the record
3 and let you read this and discuss it with your attorney
4 if you would like to. When you're ready we'll go back on
5 the record and I'll ask you some questions.

6 (Thereupon, an off the record discussion was
7 held.)

8 Q. Are you ready?

9 A. Uh-huh.

10 Q.

11
12 A.

13 Q. Other than backing up the clearing time to the
14 service restoral time, what other information do you have
15 about backing up clearing times?

16 A. That's the only information I have.

17 Q. Do you know of anyone who has been instructed to
18 back up a clearing time to a point before service was
19 restored?

20 MR. BEATTY: I'll object. It's been asked and
21 answered.

22 A. I'm sorry. Reword that for me.

23 MS. PIKE: I join in the objection. Go ahead.

24 Q. Have you heard of any managers giving maintenance
25 administrators instructions to back up clearing times to a

1 point before service was restored?

2 A. No, I never have.

3 Q. Have you heard of any employee in the company in
4 any location deliberately placing incorrect clearing times
5 on reports in order to meet the out-of-service over
6 twenty-four hour commitment time?

7 MR. BEATTY: Objection, asked and answered.

8 A. No, I don't know of any.

9 Q. Are you aware of the company's requirement that
10 out-of-service reports be repaired within twenty-four
11 hours?

12 A. Yes.

13 Q. Are you aware of the commission, PSC requirement
14 that at least ninety-five percent of out-of-service
15 reports be cleared within twenty-four hours?

16 A. No, I'm not aware of that.

17 Q. Do you know if a customer is due a rebate if
18 they're out-of-service more than twenty-four hours?

19 A. Yes.

20 Q. Do you know of any customer who has been denied a
21 rebate because any time on the report has been falsified?

22 A. I don't know of any customer who has been denied
23 any rebate at all, any kind of credit from this company at
24 all. When I worked in the business office, I mean,
25 whatever the customer wanted the customer got. You know,

1 they never ever argued a point. They just went according
2 to what the customer said and that was it.

3 Q. As a maintenance administrator does that also
4 apply?

5 A. Oh, yes.

6 Q. I'd like to show you another document. This one
7 is titled Southern Bell's response to Preliminary Order
8 No. PSC-93-0263-PCO-TL entered on February 19, 1993. And
9 this was filed by Southern Bell with the commission in the
10 rate case and it was filed on April 1, 1993.

11 On page twelve there's a Linda Moss listed. By
12 your name appears a series of numbers one, eleven and
13 seventeen, I believe; is that correct?

14 A. No. It's one, two, three, eight, and eleven.

15 Q. Okay. Thank you.

16 A. Uh-huh.

17 Q. We've already discussed number one. Number two
18 indicates that you may have some information about the use
19 of cause codes. Can you tell me what a cause code is?

20 A. Well, I guess it just means basically what caused
21 the problem, you know, what the problem was caused by.

22 Q. Can you give me some examples?

23 A. Well, 1210 is a customer, you know, problem like
24 a CPE problem. 0700 is like a test okay.

25 Q. Are there cause codes for weather?

1 A. O900. Yes, there are. That's an O420 I believe
2 or --

3 Q. Do you know if any of these codes would stop that
4 twenty-four hour repair clock on a report?

5 A. I don't know. I don't know how that would effect
6 it.

7 Q. Do you know if any of these codes would keep an
8 out-of-service report from being counted as a miss if the
9 company didn't complete that repair within twenty-four
10 hours?

11 A. I don't know that.

12 Q. Do you know of any improper use by anyone in the
13 maintenance center or outside STs of cause codes?

14 A. I don't know of any, no.

15 Q. You indicated that three was also by your name.

16 A. Yes.

17 Q. Number three is rebates. We've discussed that.

18 Let's move on. Number eight I think you said was by your
19 name.

20 A. Yes.

21 Q. Number eight indicates that you may have some
22 information about instructions not to status
23 out-of-service. Did you ever receive instructions not to
24 status reports as out-of-service?

25 A. Yes.

1 Q. And when did you receive those?

2 A. I don't remember specifically the dates but it
3 was on a holiday. It was a major holiday. And there were
4 only four of us working. And I don't know if they even
5 had a crew working outside. I'm not really sure about
6 that. I don't remember.

7 But we were told to -- There was like a hundred
8 and fifty troubles in the pool. This was to be screened
9 and we were told to status everything service effecting.

10 Q. Who gave you those instructions?

11 A. I'm not really sure. It would be the person who
12 was in charge which was a -- I would assume it was a
13 relieving supervisor because on a major holiday they don't
14 have an actual manager working.

15 I don't know. I don't remember. It may have
16 been my very first -- It was probably my first major
17 holiday. I don't even celebrate holidays so I can't
18 remember.

19 Q. That's fine. Do you know if that was a proper
20 instruction to be given?

21 MS. PIKE: I'm going to object to the form. Go
22 ahead.

23 A. Could you repeat that question.

24 Q. Let me ask you this. Based on your training that
25 you received when is it proper to status a report as

1 out-of-service?

2 A. When it's out-of-service.

3 Q. Were any of these one hundred and fifty reports
4 out-of-service based on the screening that was done?

5 A. I'm sure that they were. I'm sure there must
6 have been.

7 Q. And the instruction not to status them
8 out-of-service, was that proper based upon your training
9 and experience?

10 MS. PIKE: Same objection.

11 A. At the time I questioned, why would we status it
12 out-of-service or service effecting if it is
13 out-of-service. I questioned it. I was not given an
14 answer. I was just told to do it. And I still don't know
15 understand why.

16 And I thought -- I just assumed that it had
17 something to do with being a major holiday and having a
18 skeleton crew. I was never given an explanation. And to
19 this day I don't understand how they work that. I don't
20 work that end of it.

21 Q. Do you know if any of these reports were
22 eventually restated as out-of-service?

23 A. I have no way of knowing that. I don't know.

24 Q. Did you process the closing of any of these
25 reports?

1 A. Possible. I mean, I was working that day.

2 Q. So you're unaware; you may have or may not have
3 is your answer?

4 A. Right.

5 Q. Number eleven is by your name also. And that
6 indicates something that you may have some information
7 about improper preparation of trouble reports. Other than
8 what you may have already told me, do you have any
9 information about the improper preparation of trouble
10 reports?

11 A. What do you mean by preparation?

12 Q. Handling, coding, statusing, creation.

13 A. Could you reword the question again. Tell me
14 what it was again.

15 Q. Be glad to try. Do you have any information
16 about any employees who have improperly coded a trouble
17 report?

18 A. Specifically, no.

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

20 A. Yes.

21 Q. Can you briefly tell me what no access does.

22 A. Well, it means that they're not home obviously.

23 And the technician has made his -- Whatever he can check
24 outside, he has checked. And without getting access into
25 the home, he can't go any further. So if there's no one

1 home, he no accesses it which throws it into another
2 category. I think they're given two days. Like it goes
3 into --

4 Q. A hold status or something?

5 A. Something like that. I don't know. I mean, I'm
6 not up on how it works but I know that, you know, the
7 customers -- They leave a note on the door. And the
8 customer calls back and leaves a number for them to call
9 back and make arrangements, access arrangements.

10 Q. Do you know if that no access status on a report
11 stops that twenty-four hour repair clock?

12 A. I don't know.

13 Q. Do you know of anyone who has no accessed an
14 out-of-service report before dispatch?

15 A. No.

16 Q. Would you consider that to be improper?

17 A. Of course.

18 Q. Do you know of anyone who has no accessed a
19 report when the customer was there and they did have
20 access to the premises?

21 A. No.

22 Q. Do you know what a CON code is, carried over no
23 code?

24 A. I've heard of it but I know we don't use it
25 anymore. When I first came, there used to be something, a

1 CON code. I don't know what it was. Other than just
2 having heard of it, I don't know. I think it had
3 something to do with future due dates.

4 Q. Do you know of anyone who used a CON code -- Let
5 me ask you this first. Do you know if the CON code stops
6 the twenty-four hour clock on the report?

7 A. I don't know that, no but it seems logical to me
8 that it would because I think it had to do with a future
9 date. So it seems logical that it would somehow.

10 Those type of reports, however, are like service
11 effecting. If a person's out-of-service, they're not
12 going to want to delay it for a few days to get service.
13 I mean, it would be like a jack trouble or something like
14 that because the customer himself would have to request a
15 future due date.

16 Q. Do you know if reports for outside problems would
17 be CON'd?

18 A. No. I see no reason for that, no.

19 Q. Do you know of anyone who has used the CON code
20 without getting a future due date request from a customer?

21 A. No.

22 Q. Do you know what excluded reports are?

23 A. Yes.

24 Q. Can you briefly tell me what an excluded report
25 is.

1 A. It's a report that really, I guess, doesn't have
2 anything to do with Southern Bell. Like if it's -- Well,
3 or if you're referring them somewhere else like for
4 instance, they reported a trouble that may not even have
5 to do with Southern Bell, you would exclude it. Referred
6 to.

7 If it's for information like if a customer
8 reports that something's not working and they don't even
9 have that something, you'll call them and say well, gee,
10 you don't even have it. And then refer them to the
11 business office to get it if they want it if they so
12 choose. So that would be referred to business office to
13 add, you know, if they want it.

14 Q. Can you exclude out-of-service reports?

15 A. Oh, no.

16 Q. Do you know of anyone who has excluded
17 out-of-service reports?

18 A. No, I don't know of anyone who has ever.

19 Q. Have you ever had a manager direct you to come to
20 him or her and get permission to close out an
21 out-of-service report that was about to go over
22 twenty-four hours?

23 A. No.

24 Q. Can you briefly tell me what an employee
25 originated report is.

1 Q. Can you briefly explain to me what a test okay
2 report is.

3 A. That means if their line is testing okay and
4 there's no trouble found.

5 Q. If you have a line that's testing okay and you've
6 talked to the customer and they say they are in service,
7 is it proper under the company's procedures to close that
8 report out as out-of-service?

9 A. I'm sorry. Could you repeat that.

10 Q. That's fine. No problem.

11 A. I was thinking of something else.

12 Q. I do that all the time. It's getting late in the
13 day for me too. If you have a test okay report and you've
14 tested it and it's testing okay and you call the customer
15 and the customer says my line is working fine, is it
16 proper to take that report then and close it out as
17 out-of-service?

18 A. Oh, of course not.

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

20 A. No.

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

22 A. No.

23 Q. Do you know of anybody who has used somebody
24 else's employee code?

25 A. No.

1 Q. Do you know of anyone who has put false
2 information on a customer report?

3 A. No. I mean, I don't see how I would know
4 something like that. If somebody did something like that,
5 I'm sure they wouldn't tell me about it. No, I don't know
6 of anything.

7 Q. Have you ever been disciplined by the company for
8 your handling of customer reports?

9 A. No.

10 Q. Have you ever been given any kind of informal
11 talking to by a manager for your handling of customer
12 reports?

13 A. No. I mean, other than guidance and training, I
14 would say no.

15 Q. Have you ever filed a grievance related to your
16 work as an MA?

17 A. No.

18 Q. Do you know of anyone who has?

19 A. I can't think of any individual. I'm sure people
20 have but I can't think of anybody.

21 Q. Have you heard of any managers statusing and
22 closing customer trouble reports on their own?

23 A. No.

24 Q. I'd like to ask you about disposition codes. Can
25 you tell me what a disposition code is.

1 A. Disposition code. Oh, I thought we were talking
2 about that before when you asked me -- You were talking
3 about cause codes.

4 Q. Yes.

5 A. Oh, I confused that then last time I spoke about
6 that because the 0420 is a disposition code not a cause
7 code.

8 Q. Then let's go back and pick up then since we got
9 things kind of turned around. Do you know of any cause
10 codes then like a weather code or a customer action code
11 that would exempt a report or keep it from being counted
12 as a miss against the company?

13 A. I don't know of any, no.

14 Q. Do you know of any misuse of cause codes?

15 A. No, I don't know of any.

16 Q. Then if you were thinking about disposition codes
17 just to make sure we are clear, do you know of anyone who
18 has miscoded, deliberately miscoded disposition codes?

19 A. Not that I know of, no.

20 Q. I'd like to ask you specifically then about the
21 inside wire code. Is it a disposition code?

22 A. Inside wire code?

23 Q. Or codes. There maybe more than one. I'm not
24 sure. I think they're twelve hundred codes, CPE codes.

25 A. Well, that would be twelve hundred, yeah. When

1 the guy goes out and they don't have or they do have,
2 yeah. Okay.

3 Q. Do you ever deal with closing reports to inside
4 wire codes?

5 A. When the technicians ever call us to close out
6 live, we ask them what codes and we put down whatever
7 codes they tell us. So we -- You know, we don't question
8 them about the details of the situation or the trouble
9 that they found.

10 That's the only time that we would be dealing
11 with a code like that or any codes for outdoor people.
12 Myself as an MA, I would close a 1210, 210 if the trouble
13 was specifically in the customer's equipment.

14 Q. When the ST calls in and gives you the
15 disposition code, does he also give you information for a
16 narrative?

17 A. Yes, he gives me a narrative.

18 Q. On any of these conversations that you have had
19 with STs closing out to the twelve hundred inside wire
20 codes, did an ST ever give you a narrative that indicated
21 the problem was in the outside plant and not inside the
22 residence?

23 A. Not to my knowledge, no.

24 Q. Ms. Moss, I want to thank you. I appreciate you
25 being here. That's all the questions I have for you.

1 A. I want to say one thing because it's working on
2 my mind. You asked me if anyone has ever given numbers
3 inside here to a customer to call back. And I myself give
4 my phone number often times to customers to call me back.

5 But if there is no trouble built, I ask them to
6 call 611 and report it. And then whenever I'm able to, I
7 go and pick up the trouble but that's only out of my
8 concern for the customer whom I've already worked with.
9 But in that instance, I would -- You know, I give my
10 number out all the time to customers so that I can be
11 accessible to them.

12 Q. If the customer doesn't want to call the CRSAB to
13 report the second trouble, do you do that for them?

14 A. I am one of the persons who can, who is allowed
15 to build a trouble.

16 Q. Okay. I'm sorry. I wasn't aware of that.

17 A. But I mean, most customers wouldn't object to
18 calling 611 if I just simply explained to them that, you
19 know, thank for calling. I appreciate you calling. And
20 you know, I'd like to help you with this but I don't have
21 a trouble report.

22 If you could just please do me the favor of
23 calling 611 and reporting it. And then when the trouble
24 comes in, I'll pick it up and, you know, get right on it.
25 Most people never object to that.

1 Q. Can you build a trouble by the trouble entry
2 mask?

3 A. Yes.

4 Q. You still have that capability?

5 A. Yes, I do.

6 Q. And if -- Let me ask it this way then. Have you
7 in this process of giving out your number for customer
8 service reasons built troubles for customers then who have
9 talked to you about repeat problems?

10 A. I probably have but I can't say that I remember
11 specifically. Like I said, my routine is always to tell
12 them to call 611 and I rarely come across someone who
13 objects. Again, these are customers that I have dealt
14 with already previously so we have a rapport.

15 Q. And on the few or on the ones -- Let me say this,
16 the troubles that you have built, are those customer
17 direct or employee or --

18 A. Customer direct.

19 Q. Are you then responsible for dispatching the ones
20 that you've built?

21 A. No. No but, you know, if I built one, I would
22 take the responsibility of screening it, you know, because
23 I feel that I have committed myself to that customer so --

24 Q. Is there anything else that you wanted to add?

25 A. No.

1 Q. I think I'm through. There maybe one or two from
2 around the table. Thank you.

3 MR. GREER: I've got a couple. Ms. Moss, I
4 believe you said that you no longer use CON codes; is
5 that correct?

6 THE WITNESS: Right.

7 MR. GREER: I believe you also said that the
8 CON code dealt with future due date requests?

9 THE WITNESS: Yes, I believe that it did.

10 MR. GREER: How do you status future due
11 date requests today?

12 THE WITNESS: Well, it goes to a -- I would
13 status it one. I'm dealing with a computer. I go
14 1050 and 106. So that's on hold to
15 106 which is a future due date, I think --

16 MR. GREER: What was that?

17 THE WITNESS: Do you see 106 on there? It's
18 under I-S-T, I believe. Did you see it? Let me show
19 you. This is not the current one that we
20 use either. No, this is not current.

21 MS. RICHARDSON: Does that have a date on it?

22 THE WITNESS: January 1992. This is not
23 current. We don't use this one.

24 MR. GREER: Thank you. That's all I have.

25



