

SCANNED

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition on behalf of	:	DOCKET NO.: 910163-TL
CITIZENS OF THE STATE OF FLORIDA	:	
to initiate investigation into	:	FILED: July 21, 1992
integrity of SOUTHERN BELL	:	
TELEPHONE & TELEGRAPH COMPANY'S	:	
repair service activities and	:	
reports.	:	

DEPOSITION OF: T. C. TAYLOR

TAKEN AT THE INSTANCE OF: The Staff of the Florida
Public Service Commission

PLACE: Southern Bell Tower
301 East Bay Street
Jacksonville, Florida
20th Floor Conference Room

TIME: Commenced at 11:00 a.m.
Concluded at 11:40 a.m.

DATE: July 31, 1992

REPORTED BY: Patricia H. Vierengel, RPR
Court Reporter

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A P P E A R A N C E S (Continued)

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I N D E X

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WITNESS:

T. C. TAYLOR

DIRECT EXAMINATION BY:

MR. BECK.....7

E X H I B I T S

Deposition Exhibit 1 for identification.....13

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S T I P U L A T I O N

IT IS STIPULATED that this deposition was taken pursuant to notice in accordance with the applicable Florida Rules of Civil Procedure; that objections, except as to the form of the question, are reserved until hearing in this cause; and that the reading and signing was not waived.

IT IS ALSO STIPULATED that any off-the-record conversations are with the consent of the deponent.

---oOo---

1 T. C. TAYLOR,
2 having been produced and first duly sworn as a witness, then
3 testified as follows:

4 MR. LACKEY: Mr. Taylor, my name is Douglas
5 Lackey, and I am representing Bellsouth
6 Telecommunications Inc., Southern Bell, in this
7 deposition. There's a couple of preliminary matters
8 we need to talk about before we start. First, this
9 lady is a court reporter and she's taking down
10 everything I'm saying, and she's going to take down
11 the questions that are asked of you and your answers.

12 What she is doing may ultimately be transcribed;
13 that is, reduced to written form, and at that time you
14 have the right to review the transcript and make any
15 corrections that are necessary, and to sign the
16 document before it can be used. Now, it's my
17 understanding that you wish to exercise that right; is
18 that correct?

19 MR. HERNANDEZ: Yes.

20 MR. TAYLOR: Yes, that's correct.

21 MR. LACKEY: Second, I have an instruction I need
22 to give you which has become more complex after our
23 trip to Gainesville. If it's not clear to you, or if
24 you would like me to explain it to you, or go into any
25 more detail, I'll be happy to do it.

1 It may well be that some of the questions Mr. Beck
2 and Mr. Hatch ask you may require you to divulge
3 information which you learned as a result of an
4 investigation conducted by Southern Bell at the
5 direction of the Legal Department. If I determine
6 that such a question has been asked, I'm going to
7 object to the question on the grounds that it would
8 require the revealing of privileged information, and
9 I'm going to instruct you not to answer the question.

10 It may be, however, that they ask such a question
11 and you have personal knowledge, that is, knowledge
12 not obtained as a result of the investigation, which
13 would be responsive to the question. If that occurs,
14 then subject to your own attorney's instructions, I
15 would ask you to respond to the question.

16 It may be that they ask a question and I do not
17 object and you realize that in order to respond to the
18 question you're going to have to reveal information
19 that you learned during the course of the investigation
20 that I made reference to. If that occurs, if you would
21 just stop and tell me or your attorney that you have a
22 problem, we will step outside and we will discuss
23 it, and we will resolve it, and I'll handle it from
24 there. What I don't want you to do is reveal
25 privileged information because I inadvertently failed

1 to object to an appropriate question.

2 Now, all of this is complicated by the fact that
3 apparently there has been more than one
4 investigation, specifically there was apparently an
5 investigation conducted in Gainesville in late 1990
6 and early 1991, perhaps November or December of '90
7 and January of '91, involving out-of-service reports
8 in the Gainesville office. That investigation was
9 conducted by the Security Department, and we have not
10 asserted a privilege over the information contained in
11 that investigation. So if you're asked questions that
12 relate to that, or if you have information regarding
13 that that would be responsive to a question, we have
14 not asserted a privilege.

15 The investigation for which we are asserting the
16 privilege is the one that has taken place more
17 recently. If you were involved in it in any manner or
18 fashion, it would most likely have been through an
19 interview process where an attorney from Southern Bell
20 was involved in the interview process. I don't know
21 how to more accurately describe that investigative
22 process than that.

23 If there's any question in your mind, if a
24 question is asked of you about whether the information
25 has come from the investigation, then you should

1 simply say so and we will resolve the problem before
2 you answer the question.

3 Now, what Mr. Beck has been doing, he's been
4 principally -- the principle architect of the
5 questions asked in these depositions. What he has
6 been doing is he's been saying or been prefacing his
7 remarks with, "Do you have any information other than
8 information you may have learned during the course of
9 the investigation, which," and then he posed the
10 question, and that would allow you to answer in that
11 regard with any information you may have learned
12 during the investigation. I assume he may do that at
13 this time as well. Do you understand my instruction?

14 MR. TAYLOR: I have one question.

15 MR. LACKEY: Yes, sir

16 MR. TAYLOR: On the Gainesville situation you're
17 saying I can respond to questions, any questions on
18 Gainesville?

19 MR. LACKEY: Yes.

20 MR. TAYLOR: That I have knowledge of?

21 MR. LACKEY: That you have knowledge of. And the
22 fact that perhaps that issue came up again in the
23 second investigation, I assume the Gainesville
24 investigation preceded the privileged investigation,
25 the fact that it may have been mentioned in passing --

1 MR. TAYLOR: It was revealed --

2 MR. LACKEY: -- would not make --

3 MR. TAYLOR: -- before.

4 MR. LACKEY: It would not make -- The fact it was
5 revealed in the second investigation would not make the
6 first investigation privileged. That's the issue I am
7 trying to get.

8 MR. TAYLOR: Okay. Very good.

9 MR. LACKEY: Now, you may have -- Let me expand
10 that. You may have learned during the second
11 investigation something relevant to the topic of the
12 first investigation. That poses a different question
13 in that if that comes up we will just have to stop and
14 talk about it.

15 MR. TAYLOR: Okay.

16 MR. LACKEY: I want you to give them as much
17 information as you and your attorney can allow without
18 violating that privilege. And if there's any question,
19 let's just stop and discuss it and we will handle it on
20 a question-by-question basis.

21 MR. TAYLOR: All right.

22 MR. HERNANDEZ: I just want to make one statement.
23 Mr. Taylor, as you probably know, is a staff manager,
24 or a manager of staff here at Southern Bell, and in
25 his position he was -- he and his staff were the ones

1 that kind of started the whole investigation going.
2 A lot of knowledge he has is through that type of
3 process, people sending him reports. I'm assuming 95%
4 of that knowledge you already have through previous
5 requests.

6 I'll just let you know that, and knowing the
7 series of questions you have been asking, a lot of
8 them are going to be, yeah, you know, in Gainesville,
9 you know, they were building the base and we
10 discovered that. We assume you know that already.
11 But by basis of his position he was not out in any
12 centers or, you know, supervising MAs or anything like
13 that. He's a Network staff person, managerial.

14 MR. BECK: Okay. I appreciate that.

15 DIRECT EXAMINATION

16 BY MR. BECK:

17 Q Mr. Taylor, my name is Charlie Beck. I'm with the
18 Office of Public Counsel and I'll be starting with the
19 questions, but others may have other questions as well.

20 Could you please state your name?

21 A T. C. Taylor.

22 Q And are you employed by Southern Bell?

23 A Yes, I am.

24 Q Let me ask you a few questions about the
25 Gainesville investigation. You were intimately involved in

1 the actual investigation in Gainesville, were you not?

2 A I was involved in the discovery of the problem;
3 not the investigation that took place after that.

4 Q You were not involved in the security
5 investigation itself?

6 A No, I was not.

7 Q Okay. Let me show you a letter dated November
8 23rd, 1990. If you would just take a second and look
9 through that letter I would appreciate it.

10 MR. HERNANDEZ: Can we mark it for the deposition,
11 make a copy and have her mark it?

12 MR. BECK: Sure. Just rip it out of there.

13 MR. HERNANDEZ: We don't have to rip it out. Can
14 we get a copy?

15 MR. LACKEY: I don't know. Can I see what you're
16 talking about?

17 MR. BECK: It's not a big deal.

18 MR. HERNANDEZ: Go ahead and look at it.

19 MR. LACKEY: Yes, that's all right.

20 (Whereupon, the instrument last above-referred to was marked
21 as deposition Exhibit 1 for identification).

22 BY MR. BECK:

23 Q Mr. Taylor, do you recall this letter? It's dated
24 November 23rd, 1990, signed by Mr. Preau, I believe

25 A I saw the letter.

1 Q Didn't this assign you to work with the security
2 investigation?

3 A No, it did not.

4 Q Okay. What do you interpret the letter as doing?

5 A The letter was informing the Security Department
6 that a problem had been found in Gainesville and it was
7 turned over to them for their investigation.

8 Q Okay.

9 A My staff and I did not participate in that
10 investigation.

11 Q Your staff then discovered the problem that
12 Security then subsequently pursued?

13 A That's correct.

14 Q What brought about your staff discovering the
15 problem in Gainesville?

16 A We were looking for improprieties in reporting of
17 out-of-service trouble.

18 Q Was this a routine inspection, if you would?

19 A No. It was a special inspection.

20 Q Okay. Why or what brought about this particular
21 inspection in Gainesville?

22 A There had been a problem in Miami.

23 Q What was the problem in Miami, briefly, if you
24 could?

25 A The problem in Miami had to do with marking

1 service-affecting troubles as out-of-services and closing
2 them. As a result of that we were asked to look at all of
3 the maintenance centers, and we did that and we found this
4 problem in Gainesville.

5 Q Okay. So when you say it was a special
6 investigation, it was one that you were doing of all of the
7 maintenance centers in Florida as a result of what happened
8 in Miami?

9 A That's correct.

10 Q Did you -- And you found a problem in Gainesville
11 that you gave over to Security?

12 A That's right.

13 Q Did you find any others in your centers?

14 A We did not.

15 Q And what specifically were you looking for in your
16 inspections?

17 A We were looking for any trouble reports that were
18 being handled improperly as far as out-of-services were
19 concerned, anything that would alter a PSC report on
20 out-of-service report over 24 hours.

21 Q Did you inspect all of the centers in the state?

22 A All of them, yes.

23 Q Did your investigations that you did turn up
24 anything, or any problems other than problems with
25 out-of-service reports?

1 A No.

2 Q Were they completely clean bills of health as far
3 as any deliberate falsifications go?

4 A We could not determine that there was any
5 deliberate falsification in any other center other than
6 Gainesville.

7 Q Okay. Did your investigations reveal any
8 suspicions that there had been some in other locations?

9 A No.

10 Q Let me go through a little background with you, if
11 I might.

12 A Okay.

13 Q What is your present position with Southern Bell?

14 A I'm Operations Manager for the IMC Staff, Support,
15 which is training and implementation of different programs
16 in the IMCs.

17 Q Does it cover the entire State of Florida?

18 A Yes, it does.

19 Q Does it cover only Florida, or is it other states
20 as well?

21 A It also includes Alabama.

22 Q How long have you held that position?

23 A Roughly two years.

24 Q What position did you hold before that?

25 A I held the same position for Florida only.

1 Q And how long did you have that position?

2 A I think about 1987 to 1988. In that time frame.

3 Q Okay. And that's the position that immediately
4 preceeded your present position?

5 A That's correct.

6 Q Okay. Have you held any other positions that
7 relate to installation of maintenance centers?

8 A Nothing other than field operations.

9 Q What types of field operations?

10 A Well, I was a district plant manager for the
11 second level maintenance person.

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15 A Yes, I did.

16 Q Who did you have discussion with?

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it said. That's the rough gist of it.

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Q Now, to the best you can recall, what more

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specifically did they tell you? Did they tell you what

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A I have no idea. That was just a statement they

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made.

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Q Okay. Are there -- You mentioned earlier what occurred in Miami, and we know about Gainesville. Are there any other centers that you know of that there were any problems?

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A No. Not right now I don't. I can't think of any right now.

11

12

Q How would your job put you in a position to know about problems?

13

A Through making reviews.

14

15

Q Was making reviews one of the things you were responsible for?

16

A Yes. Um-ha. (Affirmative Response).

17

Q Could you describe what a review is?

18

19

20

A A review is where the staff reviews the operating procedures being used, in this particular case a maintenance center.

21

Q Okay.

22

23

A Basically it's to see if they are following the established practices, methods and procedures.

24

25

Q Do you have a regular schedule for making such reviews of maintenance centers?

1 A No, we don't.

2 Q About how often, if you can say, how often would
3 you do reviews of centers?

4 A All the centers or just do reviews?

5 Q Well -- how often --

6 A We do reviews about every quarter.

7 Q One review per quarter?

8 A Well, that will vary. We may do as many as three
9 or four a quarter. We may go quarters where we don't do
10 any.

11 Q How do you determine that schedule?

12 A It's basically determined by the workload and
13 having time to do it.

14 Q Okay. If it's possible, is there a certain amount
15 of time frame that would elapse between one review and the
16 next at any particular maintenance center?

17 A Say that again.

18 Q I was wondering for each -- for any particular
19 maintenance center is there a general guideline as to the
20 amount of, period of time between reviews?

21 A No, there's not.

22 Q What would you say would be typical?

23 A Right now I would say maybe six months.

24 Q How about two or three years ago?

25 A It could be a year or better.

1 Q How many installations and maintenance centers are
2 there that get reviewed in the State of Florida, or actually
3 if you could, could you try to name them?

4 A I think there's 12.

5 Q Could you tell what they are, to the best you can?

6 A Okay. Central Dade, South Dade, North Dade, South
7 Broward, North Broward, Palm Beach, Indian River, Crystal,
8 Jacksonville, Orlando, Pensacola --

9 Q Shouldn't there be one in Gainesville, also?

10 A And one in Gainesville. That should add up to 12.

11

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18 A Not that I recall.

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20 A No.

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25 A No.

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A Huh-ha. (Negative Response).

8

Q If you know, how did the Miami incident come -- or

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come to your attention regarding out of services there?

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A Through a standardization review conducted by my

11

staff.

12

Q What is a standardization review?

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A It's a review where we check the validity of the

14

closing of trouble reports, the coding of trouble reports.

15

Q Is that one of the standard reviews that you do

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with the centers?

17

A Yes, it is.

18

Q And it was your staff's inspection that discovered

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that in Miami?

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A Yes, it was.

21

Q And then there was that being uncovered that led

22

to the special inspections across the state?

23

A That's correct.

24

Q Before the Miami inspection, had any of your other

25

inspections uncovered any incidences of miscoding on

1 out-of-service reports?

2 A No, they had not. Not that -- Not that took place
3 while I and the staff. I don't know about before I had the
4 staff.

5 Q I would like to try to get an understanding of
6 what types of incidents you're familiar with. You have
7 mentioned Miami.

8 A Yes.

9 Q And that was loading up the base in Miami?

10 A Building the base.

11 Q Okay. And could you describe with a little more
12 detail what occurred in Miami, to your knowledge?

13 A There was some small number of test-okay trouble
14 reports that were scored out of service and then closed.

15 Q The purpose of that would be to build up a bigger
16 base of out-of-services so that the ones that missed
17 wouldn't count so heavily against the base?

18 A Well, that was our assumption. We reported that
19 in the feedback, and that was turned over to Security and
20 they investigated it, and I do not know the outcome of the
21 investigation.

22 Q Okay. Is there anything else that was discovered
23 in your review at Miami?

24 A No. Not from the review that I did. No.

25 Q Okay. How about through any other means?

1 A Yeah. There was an incident on CON, the
2 carry-over no, that came up in another review that was being
3 conducted by another operations manager, and he called that
4 to my attention and I told him I would look into it.

5 Q Was that after --

6 A And we did.

7 Q Was that after the investigation that your staff
8 had performed?

9 A Yes. Um-ha. (Affirmative Response).

10 Q And who was the other person who conducted --

11 A Wait a minute.

12 Q Okay.

13 A I believe that was before the incident that my
14 staff found. They were right close together.

15 Q Okay. And what is your understanding of what was
16 found on the -- about CON codes in Miami?

17 A My understanding of it was they had a couple NAs
18 that were coding those incorrectly, and it was a training
19 matter and it had been corrected.

20 Q And did they conclude, if you know, whether it was
21 being done accidentally or deliberately?

22 A I do not know.

23 Q But they were coding -- I'm not quite sure I
24 understand what you mean by, "coding the CON incorrectly."

25 A Well, CON stands for "carry-over no," and if you

1 were going to -- if you had permission from a customer to
2 extend a repair appointment, or to come out on Saturday
3 rather than on Wednesday, then you would mark it as "care-
4 over no," and it would not count as a carried-over trouble
5 report on the internal results.

6 Q So were the MAs coding in the CON code in
7 instances where there was no request by the customer for a
8 later date?

9 A Well, we don't really know that. What we know was
10 there was a large number of CONs compared to the other
11 centers, and it looked unusual, so we checked with the
12 maintenance center folks and asked them, "Why do you have
13 this problem?" And they looked into it and called my staff
14 manager back and told her that, yeah, that was a problem,
15 that it was two MAs that needed to be trained on proper use
16 of CON, and they can handle the problem.

17 Q Who were the managers involved there, if you know?

18 A I do not know who was there.

19 Q Okay. Do you know whether any discipline was
20 taken as a result of that?

21 A No, I don't.

22 Q Okay. And then you're also familiar with the
23 Gainesville investigation, is that right?

24 A Yes, I am.

25 Q And that's one where you found that tests were

1 being put into the base that -- where there hadn't been any
2 before?

3 A Trouble reports were being generated and put into
4 the base and marked out-of-service includes.

5 Q Was there anything else discovered in Gainesville?

6 A No. Not to my knowledge.

7 Q Now, do you have any knowledge of any kind of
8 improprieties with trouble reports occurring in any other
9 centers in the state?

10 A Not for the purpose of altering any reports. We
11 find errors any time we do a review.

12 Q You found nothing else that would lead you to have
13 a suspicion that there were --

14 A No.

15 Q -- things going on?

16 A No. Definitely not. And I asked that in every
17 review specifically, "Was there any intentional integrity
18 problem," and they said, "No."

19 Q In your reviews do you ever check for whether the
20 times have been backed up on the out-of-service reports to a
21 time other than the cleared time?

22 A If times were backed up?

23 A There's a lot of modules to review. I'm trying to
24 remember if there's a particular module for that. I don't
25 know.

1 Q Okay.

2 A I really don't know. I would have to look.

3 Q Do you recall ever discovering whether there was
4 any problem with the times being backed up to a time other
5 than the cleared time?

6 A I don't know how to respond to that. We back up
7 cleared times to the time that the service was restored to
8 the line. Okay. In -- They are instructed to do that, and
9 that's part of the practice. I don't know of any cases
10 where times were backed up for the purpose of altering a PSC
11 report.

12 Q Would there be any way through your -- If you
13 know, would there be any way to tell whether somebody had
14 put down a time other than the time the trouble was actually
15 repaired, you know, for the cleared time?

16 A The only way I would know to do that would be if
17 it was backed up past the time it was received.

18 Q That would be a very clear indication?

19 A And obviously there was something wrong there.

20 Q Okay.

21 A But other than that I know of no way you could
22 look at that and make that determination.

23 Q Okay. Do you know whether any centers had
24 practices where maintenance administrators would be required
25 to contact a manager in order to get the close-out code for

1 reports?

2 A Not in the past 10 years, no.

3 Q Did that used to be a practice more than 10 years
4 ago?

5 A There was a -- I don't want to say a practice.
6 There was procedure when we first went to LMOS, we changed
7 the title of the people doing the job and we had an influx
8 of operators and clerical people that did not understand the
9 maintenance job, let alone the coding, and we trained those
10 folks.

11 And then we had a management person setup as a screener
12 in the center to look at disposition, and cause code and
13 clearing time, and out-of-services, and everything on the
14 ticket before they were finally closed, and that was done as
15 a quality control to be sure that we were closing the
16 trouble reports properly.

17 In that process there was times that the MAs would ask
18 the screening person, or maybe their foreman, "Should I show
19 this as a cable trouble or a drop trouble, or is it out of
20 service, or not out of service? What time do I put down for
21 clearing it?" And just all those questions that people that
22 are inexperienced would ask.

23 Q Did that practice stop once the changeover was
24 complete and people were trained?

25 A I think it just faded away with time.

1 Q Okay.

2 A We did not -- We had that -- We had those
3 procedures when we had what we call a BOR, which is a "basic
4 output report." And when we went into automatic dispatch
5 and were stopping the paper flow in the center, then that
6 sort of phased away. There wasn't anything for them to look
7 at anymore.

8 Q Do you know whether Gainesville had a practice
9 that required MAs to contact a manager when out-of-service
10 reports went over 24 hours?

11 A No, I do not.

12 Q Do you have any knowledge about the use of no
13 access codes to stop the clock on reports when, in fact,
14 there was not a problem with access?

15 A No, I do not.

16 Q Have you --

17 A Well, I don't have any -- I don't recall anything
18 on that that -- that I have any knowledge of it.

19 Q Have you --

20 A I heard that someplace.

21 Q Okay. Have you -- If you can recall, have you
22 talked with other Southern Bell employees about that being a
23 problem?

24 A No. I think I have just heard that somehow, some
25 way. It may have been in one of the interrogatories, or the

1 production of documents or something.

2 Q Do you have any knowledge of persons excluding
3 reports that were about to miss the commitment time and then
4 being reopened as employee generated reports?

5 A No, I do not.

6 Q Okay. Have you heard of that being done? And
7 when I say, "heard of it," let me clear it for the rest of
8 my question --

9 A Excluding?

10 Q Yes. Closing out, excluding a report that's about
11 to be missed and then reopening it as a new employee
12 generated report?

13 A I don't have any knowledge of that.

14 MR. LACKEY: Let him tell you how he's going to
15 qualify his question.

16 Q If you know the answer to it solely as a result of
17 what Southern Bell attorneys or persons working with them in
18 an investigation have asked you, you can answer "No" to
19 that, if that's your only source of information. Likewise,
20 I'm not looking for stuff you have just seen in the
21 newspapers or anything like that.

22 A No. I understand.

23 MR. LACKEY: With one more qualification. TV,
24 also, and Discovery and what have you for this area, so
25 we might have sent him interrogatories that you sent us

1 in gathering answers, or PODs and that sort of thing.
2 So he can pick up information that way about what's
3 going on in this docket.

4 Q But this is something new, you know, with those
5 qualifications? You have not heard of that being done?

6 A I don't have any knowledge of trouble reports
7 being excluded and then reopened as another trouble report
8 for any reason.

9 Q Let me ask this: Do you have any knowledge about
10 employee reports being used as a means of taking what should
11 be a customer generated report out and reclassifying it as
12 an employee generated report?

13 A Let me answer that this way: And this may not be
14 exactly what you asked. Okay? There are times that trouble
15 reports are cleared and the customer's line has been
16 restored to full service, but there's additional work to do.
17 They close the report and issue a routine ticket as an
18 employee report to do whatever else needs to be done,
19 whether it's trim the trees, replace the cable, just
20 whatever else needs to be done.

21 Q That would be a proper procedure to follow?

22 A Yes, it is.

23 Q Okay. Do you know of any instances where the use
24 of employee reports has been used improperly?

25 A No, I do not. I have no personal knowledge of

1 that.

2 Q Okay. Do you have any knowledge of the statusing
3 of affecting-service reports as out-of-service reports?

4 A Yes, I do.

5 Q Okay. What do you know about that?

6 A It was the test okays that were stasured out of
7 service and closed.

8 Q Any others other than what we have already
9 discussed today?

10 A No. Not taking existing reports and closing them.
11 No, I do not.

12 Q Do you have any knowledge of the use of fictitious
13 employee codes on repair reports?

14 A Yes, I do.

15 Q Is that from Gainesville?

16 A Yes, it is.

17 Q And that's the same Gainesville incident we
18 discussed earlier?

19 A Right.

20 Q Do you have any other information about the use of
21 fictitious employee codes?

22 A No, I don't.

23 Q Certain types of codes will take a report out of
24 the PSC requirement for out-of-service reports, will they
25 not?

1 A Yes, they will.

2 Q Such as lightening, for an example?

3 A Um-ha. (Affirmative Response).

4 Q Do you have any knowledge of those codes being
5 used in instances where the code shouldn't properly apply to
6 the report?

7 A No, I do not.

8 Q Have you ever talked to anybody about that with
9 some specific information?

10 A We have had a lot of discussions about that.

11 Q Could you elaborate on that?

12 A You mean about the cause codes, the proper use of
13 cause codes?

14 Q (Nods Head).

15 A Yeah. We have run studies that would indicate
16 that they were using codes that would reflect on PSC reports
17 when they legitimately should have been excluded, and I have
18 talked to people about that and said, "You need to be sure
19 that you do your cause coding correctly so that it will fall
20 correctly." And I used examples, like burned carbons that
21 was charged to unknown, or plant equipment failure, which is
22 reported on the PSC report, which the only way you can burn
23 a carbon is with lightening, so it is obvious that that is
24 misdone.

25 We have cut cables where we actually billed people for

1 cutting the cable and they were closed out to plant or
2 equipment, or unknown, or something that would count on the
3 PSC report, and that really was a major cable failure and
4 that's excludable by the rule.

5 Now, I use those as examples to prove to the people in
6 the field that you have a problem with your people using
7 cause codes, and so we've had a lot of discussions like
8 that.

9 Q The examples you gave, those are instances where
10 an exclude code should have been used but it wasn't; is that
11 right?

12 A Um-ha. (Affirmative Response).

13 Q Now, do you have any knowlege of instances where
14 an exclude code was used when it shouldn't have been?

15 A We need to --

16 MR. LACKEY: Other than what you may have learned
17 as a part of the investigation is the way the question
18 is framed, I'm sure.

19 MR. BECK: We have been through that twice at
20 least.

21 MR. LACKEY: I know.

22 A Other than the investigation, I don't know of any.

23 Q Do you have any other knowledge of ways to build
24 the out-of-service base other than what we have talked about
25 already today?

1 A I sure don't.

2 Q Do you know of any another ways that customer
3 reports may have been falsified in any manner that we
4 haven't discussed today?

5 A No. Only the three cases, the only three cases
6 that I personally know about.

7 Q I take it that you were interviewed by Southern
8 Bell investigators in the investigation that Mr. Lackey has
9 claimed as privileged; is that correct?

10 A That's correct.

11 Q Have you assisted in the investigation in other
12 ways?

13 A No.

14 MR. BECK: Mr. Taylor, that's all I have. Thank
15 you.

16 MR. HATCH: I don't have any questions
17 (Witness excused).

18 (Whereupon, the deposition was concluded at 11:45 a.m.)

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AFFIDAVIT OF DEPONENT

This is to certify that I, T. C. TAYLOR, have read the foregoing transcript of my testimony, Pages 1 through 35, given on July 31, 1992, in Docket No. 910163-TL, and find the same to be true and correct, with the exceptions, and/or corrections, if any, as shown on the errata sheet attached hereto.

T. C. TAYLOR

Sworn to and subscribed before me this _____ day of _____, 1993.

Print name here:

Notary Public - State of Florida

My Commission Expires:

My Commission No.:

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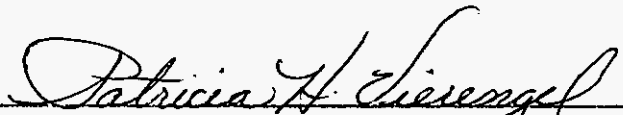
F L O R I D A)

CERTIFICATE OF OATH

COUNTY OF DUVAL)

I, the undersigned authority, certify that T. C. TAYLOR personally appeared before me and was duly sworn.

WITNESS my hand and official seal this 25th day of September, 1993.


PATRICIA H. VIERENGEL, Court Reporter
Phone (904) 725-8657
Notary Public - State of Florida
My Commission expires:
My Commission No.:

**PATRICIA H. VIERENGEL
NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXPIRES 6/21/97
COMM. # CC 296027**

1 STATE OF FLORIDA)
2 COUNTY OF DUVAL)

CERTIFICATE OF REPORTER

3

4 I, PATRICIA H. VIERENGEL, Court Reporter, DO HEREBY
5 CERTIFY that I was authorized to and did stenographically
6 report the foregoing deposition of T. C. TAYLORE;

7 I FURTHER CERTIFY that I am not a relative, employee,
8 attorney or counsel of any of the parties, nor am I a
9 relative or employee of any of the parties' attorney or
10 counsel connected with the action, nor am I financially
11 interested in the action.

DATED THIS 25th day of September, 1993.

8

9 Patricia H. Vierengel
10 PATRICIA H. VIERENGEL, Court Reporter
11 Telephone No.: (904) 725-8657

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12 STATE OF FLORIDA)
13 COUNTY OF DUVAL)

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The foregoing certificate was acknowledged before
16 me this 25th day of Sept., 1993, by PATRICIA H.
17 VIERENGEL, who is personally known to me.

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Marie C. Gentry

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Print Name:

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Notary Public - State of Florida

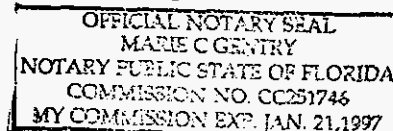
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My Commission No.:

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My Commission expires:

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November 23, 1990



PRIVATE

Mr. J. L. Preau
General Security Manager-NF
26JJ1 Southern Bell Tower
Jacksonville, Florida

Dear Jim:

Several weeks ago a routine Network review disclosed that subscriber trouble reports were being miscoded (by design) to enhance P.S.C. service results in one of the divisions in the South Florida Area.

A follow-up to this finding indicates similar actions have been taken in the Gainesville Division. T. C. Taylor's organization has the information relating to the Gainesville situation.

Please secure the necessary assistance from Mr. T. C. Taylor and conduct a full investigation of the improper coding that has occurred in the Gainesville Division.

Yours truly,

General Manager-Network/NF

CC: L. E. Crittenden
T. C. Taylor

