16 the number of people who should be working at the LISC?

17 A. Yes.

18 Q. How did you go about communicating your input on

19 that subject?

20 A. Essentially, meeting with my team as well as the

21 management team of the LISC and Robert Hough.

22 Q. Did you make suggestions in the fourth quarter

23 1996 as to staffing levels for the LISC?

24 A. Yes.

25 Q. What was your recommendation?

0096

1 A. In terms of a number?

2 Q. Yeah.

3 A. Between 700, 700 -- I think the number at that

4 time was about 742.

5 Q. So that was your recommendation as to the number

6 of employees who should be devoted to performing various

7 functions at the LISC to handle resale orders?

8 A. Yes.

9 Q. And how did you come up with the number of 742?

10 A. Again, as I mentioned earlier, looking at task

11 times and functions, and the level of mechanization, into

12 all of those factors to, essentially, determine what the

13 resource requirements would be.

14 Q. And do you remember when you made that

15 recommendation?

16 A. It was probably about the October, November time

17 frame, right about the time the volume started to kick up

18 dramatically.

19 Q. Did you communicate that recommendation in

20 writing to anyone?

21 A. I probably did, but I don't remember offhand.

22 Q. Do you remember -- who did you communicate that

23 recommendation to?

24 A. I would have communicated it to my boss.

25 Q. And who was that again?

0097

1 A. I am trying to think. My boss at that time was

2 Carol Spain. She was on maternity leave, so it's, in all

3 likelihood, I would have communicated it across to the

4 LISC management team, including Jerry Sinn.

5 Q. Did you have any discussions with Mr. Sinn about

6 your recommendation?

7 A. Not that I can recall, nothing specific.

8 Q. And so that I can understand it, your

9 recommendation was that Pacific put in place 742

10 individuals to work at the LISC to perform various

11 functions on resale orders; is that right?

12 A. Yes.

13 Q. And it was your recommendation that that number

14 of employees be brought on so that the resale orders could

15 be timely processed, no backlog developed, FOC's

16 completion notices being timely issued?

17 A. Ideally, yes.

18 Q. Did you ever hear a response from anybody after

19 you submitted that recommendation?

20 A. No.

21 MR. KOLTO-WININGER: Objection. Vague. But go

22 ahead.

23 THE WITNESS: Nothing specific that I can

24 recall.

25 MR. McDONALD: Q. Had you set a time frame for

0098

1 when those numbers should be achieved -- when the 742

2 employees should be achieved?

3 A. No. I believe it was at year-end view, as to

4 what we expected we might need by year-end.

5 Q. Do you remember what number of orders in a day,

6 if the hiring was brought to that level -- the staffing

7 was brought to that level, that the LISC could then be

8 expected to process, 2,000 orders per day or 4,000 orders

9 per day, something like that?

10 A. No, I don't remember.

11 Q. Do you remember how you went about calculating

12 the number? Was it a matter of trying to reach a forecast

13 and then working back from, you know, if we want to

14 achieve this level of capacity, and given the amount of

15 time devoted to each of the various tasks, we will need

16 this number of people in order to reach that number?

17 A. No. It was largely based on the number -- the

18 forecast as we had it at that time for the different types

19 of resale services, and then looking at -- looking at,

20 again, task times and systems functionality, et cetera, to

21 determine what we thought it would take to manage that

22 level of work. So it was at a higher level, in my view,

23 than looking at per-day capacity, throughput time.

24 Q. I was going to ask you to take a look at two of

25 these exhibits, Exhibit 14, which is a revision of the

0099

1 forecast produced at Laura Scherer's deposition and it has

2 a date of August 30th, 1996, and then also, perhaps, take

3 a look at Exhibit 15, which was marked, "Revision E," has

4 a date of 11/06/96. Can you just take a quick look at

5 those two documents?

6 Do either Exhibit 14 or Exhibit 15 look familiar

7 to you, in connection with the testimony you just gave,

8 about working from forecasts to devise proposed staffing

9 figures?

10 A. No.

11 Q. So you worked from a different forecast?

12 A. I can't say for sure as to whether I did or not.

13 Q. Do you have a recollection as to whether the

14 aggregate number for the year-end was the number that you

15 used in order to come up with this 742 number?

16 A. It looks pretty much in line in terms of

17 year-end aggregate. It looks pretty much in line with

18 what we were looking at.

19 Q. So the record is clear, you are looking at

20 Exhibit 14, and I think what you pointed to was the total

21 resale access line, without getting into the number, total

22 resale access line, what's shown in the December '96

23 column; is that right?

24 A. Correct.

25 Q. And so you were working from that number, or

0100

1 something close to that number, as the total volume that

2 you used to develop the staffing figure of 742?

3 A. I mean, based on my recollection, it looks to be

4 close to the number that we were working with, but I can't

5 say with absolute certainty that it is.

6 Q. When you developed that number, did you work

7 from a spreadsheet or something like that?

8 What occurred to me is that maybe we can just

9 ask you to go back and take a look at a file that you

10 produced through counsel so we won't be guessing. We will

11 have, here is the X number that we were shooting for in

12 terms of value.

13 MR. KOLTO-WININGER: We will take that as a data

14 request and ask the witness to do that, but I will

15 represent, for the record, because these forecasts were

16 prepared at my direction, that that came from the same

17 existing database, deleting nonresale information, so it

18 would not look exactly the same.

19 THE WITNESS: Yeah.

20 MR. McDONALD: I am just curious to see how the

21 742 number was derived, and if it had extraneous stuff in

22 addition.

23 MR. KOLTO-WININGER: That's why I don't mind you

24 requesting for whatever document she may have in her file

25 that she relied upon.

0101

1 MR. McDONALD: Okay.

2 MR. KOLTO-WININGER: But I am just explaining

3 that that was a document produced at my direction.

4 MR. McDONALD: Okay.

5 MR. ETTINGER: So that I am clear, you have

6 agreed to provide that spreadsheet to the parties,

7 assuming it exists?

8 MR. KOLTO-WININGER: I will ask the witness to

9 see if she has a spreadsheet that she relied upon in

10 deriving that number, and if she does, I would request

11 just that a one sentence letter be made out for the

12 record, because with the multi-tasks that I am taking

13 on --

14 MR. ETTINGER: You want to remember it.

15 MR. KOLTO-WININGER: Exactly.

16 MR. McDONALD: It's not a spreadsheet, and if

17 it's some handwritten calculations, that's fine, too, I

18 will take that, too, but I will write a little letter and

19 we can go about it that way.

20 Q. So this recommendation, you believe, was made in

21 October, November '96?

22 A. Yeah.

23 Q. Since that time, have you made any subsequent

24 recommendations as to staffing levels for the LISC?

25 A. No.

0102

1 Q. Have you discussed staffing levels at the LISC

2 with anyone since you made that recommendation?

3 A. Only in casual conversation, not in terms of

4 planning or any of the activities that go into picking up

5 resources and, you know, staffing, that type of thing.

6 Q. Who have you had sort of casual conversations

7 with?

8 A. Members of my staff, members of the LISC

9 management team, Ann Long, Don Griffin, others.

10 Q. Have those discussions centered essentially on

11 efforts to augment the LISC staffing?

12 A. Yes.

13 Q. Now, after you made this recommendation, did you

14 follow up with anyone to whom you had forwarded the

15 recommendation?

16 A. No, I don't believe so.

17 Q. And what caused you to provide the

18 recommendation? Did a formal request come to you saying

19 we'd like your input on the number of individuals we

20 should have at the LISC?

21 A. Yes.

22 Q. Do you remember who made that request to you?

23 A. No, I don't.

24 Q. Did that come to you in a written -- did that

25 request come to you in a written format, do you know?

0103

1 A. I seriously doubt it, yeah. I honestly don't

2 remember, yeah.

3 Q. Generally, those types of requests wouldn't come

4 to you in memo form; it would be more likely it would be

5 an oral communication of some kind?

6 A. Generally, yes, it's likely to be an oral

7 communication.

8 Q. Was that the only time you made a recommendation

9 as to the number of people who should be at the LISC -- or

10 going back to, say, 1995, were you involved in providing

11 suggested staffing levels?

12 A. Yes.

13 Q. During the planning process?

14 A. Yes, I was.

15 Q. Do you recall what any earlier recommendations

16 you had made?

17 A. Earlier recommendations ranged from a little

18 over a hundred to up to 400 employees, again, depending on

19 what was going on relative to the reality within LISC,

20 regulatory environment, and the Commission's orders, and

21 the product set or product mix that came out as a result

22 of those orders. So there are a lot of different factors

23 that would influence what you thought your staffing

24 requirements are for the LISC.

25 Q. So for example, if you made one recommendation

0104

1 and then learned that the systems people had developed

2 some fabulous system that could reduce the number of

3 individuals required, you could revise your projection,

4 your representation as to the level, staffing level, and

5 still achieve the same level of capacity?

6 A. In theory, yes.

7 Q. Do you know if you have those earlier

8 recommendations in written form anywhere?

9 A. No, I don't know.

10 Q. Maybe that's something else I will put in a

11 little request, that that be looked for.

12 Now, another thing that you mentioned, I think

13 earlier, that you had been involved in discussions that

14 had to do with the level of training for LISC employees;

15 is that right?

16 A. Yes.

17 Q. Did you make recommendations on that point?

18 A. In terms of what type of training?

19 Q. Exactly.

20 A. Or level, or --

21 Q. Did they have Ph.D.'s or, you know?

22 A. I did not make recommendations in terms of

23 prerequisites, but certainly into the terms of the content

24 of the training, the layout as to whether it's initial

25 training, continuation training, those types of things,

0105

1 the length of time training might take.

2 Q. In setting up processes, don't you need to make

3 an assumption --

4 MR. KOLTO-WININGER: Can we take a quick break?

5 MR. McDONALD: Sure.

6 (Recess taken.)

7 MR. McDONALD: Q. Maybe just to backtrack a

8 little bit, I'd asked you whether the actual LISC

9 operations deviated from the planning, and you told us

10 that there were some problems that you had identified and

11 you attributed to, I think, the staffing level and the

12 training level and mechanization at the LISC; is that

13 right?

14 A. Yeah, as well as the product mix that came as a

15 result of the CPUC's order in March and then the FCC's

16 order in August.

17 Q. March of what year?

18 A. '96.

19 Q. And then August of?

20 A. '96.

21 Q. What is it about -- what changed in the product

22 mix between what you had planned and what actually

23 developed?

24 A. We added more products to the resale mix as a

25 result of the CPUC's order, and more of the complex

0106

1 services. And then, as a result of the FCC's order, we

2 got into the negotiations with the CLC's over contracts,

3 which brought us to total resale, for those CLC's with

4 which we'd negotiated agreements.

5 Q. Well, as to the FCC order, what about the

6 interconnection agreements changed the product mix from

7 what you had planned?

8 A. Well, my understanding is that, and, you know, I

9 can't quote you the FCC's order, but my understanding is

10 that we entered into -- we were ordered to enter into

11 interconnection agreements with the CLC's and those

12 interconnection agreements addressed resale.

13 Q. But can you identify any sort of mix of products

14 that, you know -- for example, when you did the planning

15 in 1995, you anticipated, you know, three products, three

16 products solely, and then with the issuance of this FCC

17 order in August of '96, all of a sudden it became 200

18 products. What changed?

19 A. Okay. In 1995, we were looking at largely basic

20 exchange service, POTS, Plain Old Telephone Service, both

21 business and residence. As we got closer to mid-year and

22 third quarter of '95, the Commission came out with a draft

23 or a preliminary type order that indicated basic services,

24 but there wasn't a lot of descripture or meat around what

25 that meant.

0107

1 And so we began planning around POTS type

2 services with certain features and functions, certain

3 types of usage, but were not looking yet at complex

4 services such as Centrex, ISDN, PBX, private lines, Fast

5 Packet, the rest of Pacific Bell's retail line,

6 essentially, and that didn't occur until March of '96 when

7 the final order on resale came out.

8 And it indicated basic services with custom

9 calling features, usage, listings of the complex services,

10 Centrex, ISDN. They were silent on PBX, and I don't

11 remember offhand about private line. I think private line

12 may have been ordered within that time frame, with Centrex

13 and ISDN as well. So that added, in March of '96, that

14 added a considerable number of products to the family of

15 resale services.

16 Q. Well, is it your testimony that some of the

17 problems that you have earlier testified to, in terms of

18 the loss of dial tone and the like, is attributable to the

19 expansion in the number of services that Pacific was

20 obligated to offer on a resale basis?

21 A. I don't know that I would make a direct

22 relationship between the mix of products and services and

23 the loss of dial tone. The loss of dial tone was,

24 specifically, a process related issue, associated with the

25 service order entries that we discussed earlier.

0108

1 Q. So in terms of identifying the sources of some

2 of these problems that you have testified to -- let me

3 make sure I understand.

4 You have identified one of the sources is just a

5 lack of people at the LISC; is that right?

6 A. Yes.

7 Q. Another one had to do with adequacy of training

8 for people at the LISC; is that right?

9 A. I don't remember saying specifically that, but

10 in terms of training --

11 Q. Let me interrupt you. Rather than training, how

12 about expertise? Is that a fair characterization of what

13 your testimony was?

14 A. Yes, that's a fair characterization, yes.

15 Q. Can you explain what you mean by expertise?

16 A. Essentially, what we have got, we've got a small

17 base of service representatives in the LISC, and then, the

18 larger group of service reps and order writers in the LISC

19 are largely direct hires, new people that have been hired

20 into Pacific to fulfill those functions.

21 Now, service rep training and order writer

22 training is approximately 12 weeks. There are some things

23 that LISC reps need to be trained on that you don't

24 generally find in the retail business, because the

25 differences in processes, that type of thing, from order

0109

1 confirmations, detail completions, that type of thing.

2 And there are other aspects of the training that

3 are applicable to retail but not applicable to LISC reps,

4 in terms of end user type interactions. But the

5 complexity is greater in the LISC side, in that they are

6 handling a much larger family of products and services

7 than our retail service reps, so that you got the issue of

8 bringing new people into the business who don't know

9 anything about telecommunications, let alone Pacific's

10 business processes, compounded by the fact that they are

11 having to learn about a lot of different types of

12 products.

13 They are not just resident reps and dealing with

14 resident products. They're universal, more universal, in

15 that they deal with residential products, business

16 products, simple, complex, the whole gambit, essentially,

17 private line services.

18 That then gets you into continuation training,

19 because you can only give someone so much training before

20 you got to get them out onto their job to up their

21 experience level. At which point, you then bring them

22 back into continuation training, what we call continuation

23 training, to give them additional background on additional

24 products, get them back out into the job again to up their

25 experience level, and then bring them back for more

0110

1 continuation training.

2 So it's a phase to reach, essentially, to bring

3 the LISC grads up to speed in this large family of

4 products that have been brought in in a very short time

5 frame. Because if you consider from March of 1996, when

6 we got the CPUC's order, and then again in August of '96

7 with the FCC's order, between that time frame and end of

8 year, a very short time frame, at which time -- at the

9 same time that we are bringing all these people in, the

10 volumes are ramping-up drastically, so -- a number of

11 different factors influence that.

12 Q. So when a new employee comes in, who is hired to

13 work at the LISC, do they receive service rep training

14 that's common to both the retail service rep as well as

15 the LISC service rep?

16 A. Yes, some aspect of the training has been

17 developed, specifically, for LISC service reps, but it was

18 taken from retail service rep training and modified for

19 the LISC environment.

20 Q. Okay. So going back, we've got the number of

21 staffing levels, number of people, we've got expertise,

22 you mentioned mechanization. Can you describe what you

23 meant by that?

24 A. Well, essentially, we had expected a certain

25 level of mechanization, perhaps naively, so that did not

0111
1 occur in the time frame that we had originally expected it
2 to occur, largely, as I mentioned earlier, due to the
3 complexity of that mechanization development effort.
4 Q. And then the fourth element was the augmentation
5 of the product mix beyond what you had planned for?
6 A. Correct.
7 Q. And does that describe, those four elements, and
8 I can run through them again if you want, describe what
9 you understand to be sort of the source of the problems
10 that you have talked about in your testimony?
11 A. For the most part, yes.
12 Q. Is there anything else that you are aware of
13 today?
14 A. No.
15 Q. Now, among the problems that we talked about
16 earlier -- I guess one thing that occurred to me in
17 looking at my notes is, we have had no testimony on, I
18 don't think, the end users being dropped from the 411
19 database. Is that an issue that you are aware of?
20 A. I am aware of it, yes.
21 Q. Did you have any involvement in that issue?
22 MR. KOLTO-WININGER: Did you say there has been
23 no testimony?
24 MR. McDONALD: In today's deposition. I think
25 there's been a lot of testimony.
0112
1 MR. KOLTO-WININGER: That's why I was trying to
2 recall if maybe you weren't here.

0111

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23 no testimony?

24 MR. McDONALD: In today's deposition. I think

25 there's been a lot of testimony.

0112

1 MR. KOLTO-WININGER: That's why I was trying to

2 recall if maybe you weren't here.

3 THE WITNESS: I'm sorry. Can you repeat the

4 question?

5 MR. McDONALD: Q. Were you involved in

6 addressing the problem of some end users losing their 411

7 database listing?

8 A. Yes.

9 Q. And in the sequence, these five stages that we

10 went through earlier, would that fall in the provisioning

11 stage, to your knowledge, or in the completion response

12 stage?

13 A. It falls within the provisioning, but it falls

14 post completion of the actual migration.

15 Q. And can you describe what you understood the

16 problem to be?

17 A. The problem, as I understood it, was largely one

18 of the processing time frames for the listings in

19 association with the migration. The migration, when it

20 completes the disconnect order, removes the listing in its

21 current state from the database, and the listing is then

22 re-input into the database, post completion of the

23 migration. And there's a gap, essentially, usually two to

24 three days between the time the migration is completed and

25 the time that the listing goes back into the database.

0113

1 Q. And you received, or Pacific received complaints

2 from CLC's that end users were complaining that they had

3 lost their listing for some period of time; is that right?

4 A. Yes.

5 Q. And did you undertake, or to your knowledge, did

6 someone at Pacific undertake an effort to resolve that

7 issue?

8 A. There is a team of people that have and continue

9 to look at the listings process.

10 Q. Do you know what's being done to try to

11 alleviate it?

12 A. Offhand, I don't know the specific activities

13 that are going on with that particular team.

14 Q. Is that a process issue or a systems issue, or

15 is it a staff issue?

16 A. It could be a combination of any of the three.

17 Q. You don't have direct responsibility for trying

18 to develop a remedy to that problem?

19 A. No.

20 Q. Who does?

21 A. That would be the listings team who have that

22 responsibility under Teresa Michael.

23 Q. But in developing the processes, one of the

24 processes that you developed was the determination that

25 the listing input would be done at or near the end of

0114

1 the -- of this entire process; is that right?

2 A. That came as a result of the listings team.

3 Q. So the listings team advised you that that is

4 when that process should occur?

5 A. Yes.

6 Q. Did they explain why?

7 A. My understanding is that the listings gateway

8 cannot hold the listing until completion of the migration.

9 And until the migration is completed, if you allowed the

10 directory listing to go in through the gateway, you'd have

11 a duplicate and it would bounce.

12 Q. Do you know if there is any effort to avoid

13 there being any listing change, where this is simply a

14 migration order that's being processed?

15 A. Yes.

16 Q. And do you know why that was or was not pursued?

17 A. It was pursued and implemented in January, I

18 believe. It's called the listings as-is process.

19 Q. Was that a process change or a systems change

20 that has been implemented?

21 A. Both.

22 Q. And that was done in an attempt to ameliorate

23 the problem, fix the problem with the 411 database drop?

24 A. Yes. That was one of the reasons that it was

25 put into place, yes.

0115

1 Q. Are you familiar with contentions that end users

2 have lost or been threatened with a loss of their listing

3 in Yellow Pages, as a result of a migration order?

4 A. No.

5 Q. And on the 411 database drop, you said there was

6 a fix implemented in January; is that right?

7 A. Yes.

8 Q. And there's still work ongoing on that problem?

9 A. Essentially, what we did is to institute

10 listings as-is in January to offer to the CLC's, to submit

11 a request for migration, either a migration as-is or

12 migration as specified, but to specify on the request that

13 the listing is to remain intact. And to my knowledge,

14 there are very few CLC's who are utilizing that

15 capability.

16 Q. So is there additional work, then, being done on

17 the 411 database issue?

18 A. There is a team that is looking at that, yes.

19 Q. And that's outside your area?

20 A. Yes.

21 Q. Were you involved in developing the listings

22 as-is order?

23 A. I was not involved at the detailed level. That

24 would be my business process staff, my first level staff,

25 that would be involved with that. I was involved in the

0116

1 initial decision to pursue a listings as-is solution.

2 Q. Do you have any involvement with the ISC?

3 A. No.

4 Q. When you were planning the processes for LISC

5 back in 1995, who made the determination that the

6 migration would require both a change and a disconnect

7 order?

8 A. That determination was made, based on the

9 decision to move to a CABS billing platform for resale

10 services, at the request of the CLC's. It was largely a

11 team decision, based on the capabilities and limitations

12 of the existing systems and processes to facilitate moving

13 a customer, an end-user customer from CRIS to CABS.

14 Q. Did you consider what other RBOC's were doing to

15 effectuate migration orders?

16 MR. KOLTO-WININGER: The witness personally?

17 MR. McDONALD: Yes.

18 THE WITNESS: Yes.

19 MR. McDONALD: Q. And are you aware of other

20 RBOC's that use the same process of having both a change

21 order and a disconnect order?

22 A. I am aware of other RBOC's that use a two-order

23 process. I am not aware of any other RBOC that agreed to

24 go with the CABS billing solution as Pacific did.

25 Q. Have you been involved in communicating with the

0117

1 CLC's regarding revisions to the LISC processes?

2 A. Yes.

3 Q. And you are aware, are you not, of some -- the

4 systems people working on new software, I think they have

5 been called various releases of a particular date, are

6 they not?

7 A. Yes.

8 Q. And there was a release of March 31; is that

9 right?

10 A. Yes.

11 Q. There is a planned release of May 31?

12 A. Yes.

13 Q. Are you involved in the development, in any way,

14 of those releases?

15 A. Yes.

16 Q. And what was your involvement with the March 31

17 release?

18 A. The March 31 release, we were primarily involved

19 with the implementation of that release within the LISC,

20 and prior to that, involved with some of the user

21 acceptance testing within LISC to ensure the capabilities

22 of the system. That's pretty much it.

23 Q. Were you involved in the implementation of the

24 March 31 release?

25 A. Yes.

0118

1 Q. And are you familiar with how that release

2 performed?

3 A. Yes.

4 Q. Can you describe your understanding of how it

5 performed?

6 A. For the most part, the release was successful in

7 terms of the functionality that it provided the LISC,

8 relative to tracking an assignment of incoming requests.

9 We had some problems with CLC's submitting requests

10 without all of the appropriate data fields or information

11 that resulted in rejects.

12 They couldn't get stuff in over the NDM. Those

13 were resolved, essentially, as a result of going back to

14 those CLC's to specify that they needed to provide certain

15 data elements.

16 Q. What enhancement was the March 31 release

17 intended to achieve?

18 A. It was largely an internal to the LISC

19 enhancement, to enhance their assignment and tracking

20 capabilities.

21 Q. Does it apply to all orders that come into the

22 LISC or is it limited to certain types of orders?

23 A. It applies to the requests that come into the

24 LISC over the resale mechanized interface, the NDM.

25 Q. So any NDM orders benefit by the March 31

0119

1 release?

2 A. Right.

3 Q. But not all orders can come in via NDM, right?

4 A. Correct.

5 Q. Can you describe, generally, those orders that

6 are capable of being received via NDM versus those that

7 are not?

8 A. Basic exchange services and their features and

9 functions, otherwise known as vertical features, and PBX

10 services can come in over the NDM. Centrex and ISDN

11 services can come in over Pacific Bell's service manager,

12 PBSM, which is an online application for those services.

13 Private line services and Special Access, both of which

14 are contained in the same tariff, the CPUC 175 T, can come

15 in over an access service request service through Cesar,

16 which is either a batch or an online application at the

17 customer's choice. That pretty much covers.

18 Q. With respect to the May 31 release, you have

19 worked on that, I think you said?

20 A. My staff did, yes.

21 Q. What aspect of that release has your staff

22 worked on?

23 A. They worked largely on training and

24 implementation within with LISC.

25 Q. And is that release also focused on orders that

0120

1 are capable of being submitted via NDM?

2 A. Correct.

3 Q. Do you know if there is an expectation that, at

4 this point, whether that release will be in place by May

5 31?

6 A. At this point, I believe, yes. The expectation

7 is that it will be in place by May 31st.

8 Q. Do you know if the LISC staffing has ever

9 reached the level of 742 employees that you represented

10 back in October or November?

11 A. I don't believe we are currently at that number

12 which, again, was an estimate -- I mean, it was around 740

13 something.

14 Q. Sure.

15 A. Yeah, mid-700's. I don't believe that currently

16 we are at that level in terms of staffing. I know that

17 there are -- that we have hired a large number of people,

18 and that we have concurrent training sessions going on

19 statewide to get the folks training, but I don't know what

20 the exact number is.

21 Q. Do you know if there are plans in place to hire

22 and to staff at that level, at some point in the future?

23 A. Yes.

24 Q. Do you know what those plans are?

25 A. Again, I don't know the precise numbers in terms

0121

1 of the phased approach, but I know that there are plans to

2 bring on additional resources upwards of 6-, 700, and to

3 bring them on over the next several months. I don't know

4 exactly what the timing is on all of that.

5 We are establishing for centers in Southern

6 California. We are going to be upping the numbers in the

7 San Francisco location. We have a center that's going to

8 be ramping-up in Sacramento, and I don't know precisely

9 what the plans are for Tustin, but we have offices in

10 Tustin as well.

11 Q. Were you involved in developing the processes

12 for those other locations that you mentioned, I guess

13 Sacramento and Tustin?

14 A. The basic business process for ordering and

15 providing resale services is the same, regardless of

16 location, so there are no differences, that I am aware of,

17 in terms of how they process their requests.

18 Q. Am I correct to understand that the current

19 process, say, for an order that comes in via NDM, calls

20 for the order to be -- it's received at the LISC and a

21 printout is made to show it's received; is that right?

22 A. That was the case until March 31st, and

23 effective with the RMI 1.5 release, the service rep can

24 view the request online.

25 Q. So there is no printout, then, made?