

1 from the State of Vermont to the secretary of the
2 FCC. And that's dated January 3rd and has a Bate
3 Stamp 08172. Do you recognize this letter?

4 A. Vaguely, yes.

5 Q. If you look to page three of the
6 letter, you are cc'd on it, are you not?

7 A. Correct.

8 Q. When do you remember receiving this
9 letter?

10 A. I don't remember exactly.

11 Q. Do you remember if you received this
12 letter after you received the December 31st
13 letter from the State of Vermont?

14 A. I don't remember. Once this letter
15 came in, Shannon handled the responses. So if I
16 got anything, I would probably put it in her box
17 or on her desk.

18 Q. But you received both the December
19 31st letter and the January 3rd letter from the
20 State of Vermont; is that correct?

21 A. Yes.

1 Q. Maybe it would trigger your memory if
2 you saw both of them. Yet you received maybe the
3 January 3rd before the December 31st, does that
4 trigger anything in your mind about when you
5 received both the letters?

6 A. Actually, it doesn't. Like I said,
7 the week before and the week after were optional.
8 A lot of people were not at work. And that also
9 depends on when it could have gotten in my box,
10 also.

11 Q. Did Ms. Dennie receive this letter?
12 I'm sorry, the January 3rd letter.

13 A. Yes, she did.

14 Q. Did you have any discussions with her
15 about the January 3rd letter?

16 A. I don't remember. Like I said, she
17 responded to the letters.

18 Q. She responded to both letters?

19 A. Correct.

20 Q. So you didn't have anything to do with
21 responding to either the December 31st letter or

1 the January 3rd letter?

2 A. No.

3 Q. And you didn't have any discussions
4 with anybody about either letter in terms of how
5 the company was going to respond?

6 A. It would have just been with Shannon
7 Dennie.

8 Q. Do you know when Ms. Dennie responded
9 to either or both of these letters?

10 A. No, I don't.

11 Q. Do you remember seeing Ms. Dennie's
12 response to either or both of these letters?

13 A. No, I don't.

14 Q. I'm going to show you the January 8
15 letter from Ms. Dennie to Ms. Hoffman. What I've
16 shown you is a January 8th letter on Business
17 Options, Inc. letterhead signed by Shannon Dennie
18 to Sarah Hoffman of the Vermont commission. Have
19 you ever seen that letter before today?

20 A. I don't believe so.

21 Q. And you did not assist in the

1 preparation of that letter in any way?

2 A. No.

3 Q. Thank you. Did there come a time when
4 you found out that the FCC had issued a Show
5 Cause Order against Business Options?

6 A. Yes.

7 Q. When was that?

8 A. I looked at it the day we got it.

9 Q. Do you remember about when that was?

10 A. Sometime in April.

11 Q. How did you find out this order?

12 A. Shannon Dennie showed it to me.

13 Q. Did she say anything to you?

14 A. No.

15 Q. She just handed it to you?

16 A. She said -- yes. And told me to read
17 it.

18 Q. Did you read it right then?

19 A. Yes, I did.

20 Q. What is your reaction to this?

21 A. My mouth probably dropped to the

1 floor.

2 Q. Why is that?

3 A. It just seemed scary to me.

4 Q. What about it seemed scary?

5 A. Just that it was -- it seemed like, in
6 my opinion, that it was going to be just a big
7 investigation.

8 MR. HAWA: It was scary to me, too.

9 Q. Did you talk to anyone at Business
10 Options after you read it?

11 A. Just Shannon Dennie.

12 Q. When did you speak with her?

13 A. After I read it.

14 Q. That same day?

15 A. Yes.

16 Q. And what was that conversation like?

17 A. I just asked her what it was all
18 about. And I don't think that she was completely
19 sure how it was going to go. Kurtis hadn't been
20 in yet.

21 Q. Did you ever talk to Kurtis about the

1 Show Cause Order?

2 A. No.

3 Q. Even to this day, you haven't?

4 A. No.

5 MR. HAWA: We should clarify on behalf
6 of previous depositions. When you're asking,
7 discussed the show cause, you're talking about
8 the substance of the document itself, not the
9 proceeding generally.

10 MR. HARKRADER: Correct. I am. Thank
11 you. And that's the Order to Show Cause and
12 Notice of Opportunity for a Hearing.

13 BY MR. HARKRADER:

14 Q. Did the order surprise you when it
15 came out?

16 A. Maybe a little.

17 Q. Why is that?

18 A. I don't know, it just did.

19 Q. Did it surprise you that the
20 Commission had apparently some problems with your
21 Discontinuance Application?

1 A. No.

2 Q. It did not surprise you?

3 A. No.

4 Q. Why is that?

5 A. Because when I came in -- like I said,
6 everything was so fast. And that I thought that
7 it should have been done already. That it was
8 neglected by Bill. That it should have been
9 already -- that the Discontinuance Letter should
10 have been already out. The Discontinuance
11 Application should have already been out.
12 Everything was rushed.

13 Q. Because it was rushed, you were not
14 surprised?

15 A. Because it was rushed and because I
16 did it, yes.

17 Q. Because it was rushed and because you
18 did it, you were not surprised that the FCC had a
19 problem with the Discontinuance Application?

20 A. Yes.

21 Q. I know that you have covered this

1 before, but I think it was a while ago. Do you
2 remember when we discussed the inquiry letter
3 that the Commission sent to Business Options at
4 the very beginning of November?

5 A. November 19th?

6 Q. No. November 1st. Do you remember
7 when we looked at that earlier today?

8 A. Yes.

9 Q. And I believe you told me that you had
10 nothing to do with the response to this letter?

11 A. No, I did not.

12 Q. Thank you for clarifying that. Thank
13 you for putting up with that question.

14 (A short break was taken.)

15 Q. I have three or four, maybe five quick
16 follow-up questions. One goes back to paragraph
17 eight of the 63.71 application. If you have that
18 in front of you. In the sentence that we
19 discussed, the part of the sentence where it
20 says, "Our letter has all the information
21 requested by the State of Vermont." I just want

1 to clarify that by "Our letter," you meant the
2 letter that BOI sent out to as opposed to the
3 letter you initially drafted?

4 A. Correct.

5 Q. And did you believe that when you
6 wrote that that the letter that was eventually
7 sent out, seeing how it had -- it had less
8 information than the letter you drafted, did you
9 believe that that letter had all the information
10 that was requested by the State of Vermont?

11 MR. HAWA: I have to object. I'll
12 have her answer, but we need some relevance.
13 Given that Vermont proposed letter failed to
14 comply with the FCC's rules, it would be
15 irrelevant that still even less information -- we
16 still wouldn't have complied with the FCC's
17 rules. I just want to make that clear. Go ahead
18 and answer. Did you think that that letter
19 complied with what Vermont wanted, not the FCC?

20 THE WITNESS: I believe that my letter
21 that I drafted that did not go out reflected more

1 of what they wanted to see than the letter that
2 was sent out.

3 BY MR. HARKRADER:

4 Q. Reflected -- I'm sorry to do this, but
5 reflected more than who wanted to see?

6 A. The Vermont.

7 Q. Did you ask anyone at Business Options
8 when you received that November 19 letter from
9 Ms. Dennie, did you ask anybody what 63.71 meant
10 or 63.71 said?

11 A. I asked Shannon. And she said it was
12 a regulation according to the FCC.

13 Q. Did she give you any more detail?

14 A. No. She had not read it, either.

15 Q. Did she tell you that in order to
16 direct you to finding -- where you might find
17 63.71?

18 A. She said that I could probably find it
19 on-line.

20 Q. Okay. You testified earlier that you
21 were -- part of your job was reviewing

1 verification tapes?

2 A. Correct.

3 Q. When you compare or when you listen to
4 those tapes, do you also look at a script or do
5 you just listen to the tapes?

6 A. I just listen to the tapes.

7 Q. And when you do that, do you check the
8 tapes with what the FCC rules require?

9 A. No, I don't. But I submit it -- a
10 verification script that I felt was in regulation
11 of the FCC rules a couple months ago.

12 Q. Who did you submit it to?

13 A. I submitted it over to Buzz Telecom.

14 Q. And this is a third party verification
15 script as opposed to a telemarketing script?

16 A. Correct.

17 Q. And who did you submit it to?

18 A. I believe I showed it to Keanan. And
19 I submitted it to USBI sprint's review.

20 Q. I'm sorry. For Sprint's review?

21 A. Yes. USB had their bill and Sprint

1 needed verification scripts and sales and a lot
2 of information in order to approve.

3 Q. The "it" is the script that you
4 submitted to Keanan and everyone else?

5 A. Correct.

6 Q. How did you know that that script that
7 you submitted was in compliance with the FCC's
8 rules regarding verification?

9 A. Because I talked to somebody from USBI
10 and she told me what the scripts needed to have
11 in them.

12 Q. And what is USBI's relationship --

13 A. Billing company.

14 Q. -- for Buzz Telecom?

15 A. Correct.

16 Q. Do you know where they are located?

17 A. No, I don't.

18 Q. Are they located here in Indiana?

19 A. No, they're not. Their area code is
20 210, if that helps you.

21 Q. 210, it does help me. San Antonio.

1 In the very beginning, you said that nine states
2 had been revoked?

3 A. Correct.

4 Q. Do you know which ones?

5 A. Exactly, no.

6 Q. And this was around the time of
7 November, December when you first came to Buzz,
8 correct?

9 A. Correct. It was in December.

10 Q. Do you know why those states were
11 revoked?

12 A. Most of them were for noncompliance to
13 the annual reports.

14 Q. Do you remember any of those specific
15 states?

16 A. I have a report.

17 Q. But sitting here today, you can't
18 remember?

19 A. Not specifically.

20 (Discussion held off the record.)

21 Q. Are you familiar with a man by the

1 name of Gene Chill?

2 A. Yes.

3 Q. Did you have any relationship with him
4 when he was working at Buzz Telecom?

5 A. What do you mean by "relationship"?

6 Q. Did you work with him?

7 A. Yes. Not side by side. He wasn't my
8 senior or anything.

9 Q. Did you work on the same projects?

10 A. No.

11 Q. What was his area of responsibility?

12 A. I believe he was in charge of
13 personnel and ethics.

14 Q. And nothing that he did overlapped
15 with anything that you were responsible for; is
16 that correct?

17 A. Correct.

18 Q. The same with Shalanda Robinson?

19 A. No.

20 MR. HARKRADER: That's all I have. Do
21 you have anything?

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MR. HAWA: Not now.

(Reading and signing requested.)

(Deposition concluded 5:45 p.m.)

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CERTIFICATE OF REPORTER/NOTARY PUBLIC

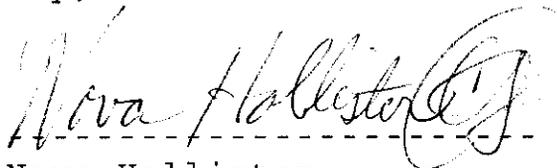
STATE OF INDIANA, to wit:

I, NOVA HOLLISTER, a Notary Public of the State of Indiana, do hereby certify that the within-named witness personally appeared before me at the time and place herein set out, and after having been duly sworn by me, according to law, was examined by counsel.

I further certify that the examination was recorded stenographically by me and this transcript is a true record of the proceedings.

I further certify that I am not of counsel to any of the parties, nor in any way interested in the outcome of this action.

As witness my hand and notarial seal
this 28th day of July, 2003.



Nova Hollister
Notary Public

My Commission Expires: 07-06-09

1 DATE SENT: July 28, 2003

2 ERRATA SHEET

3 DEPOSITION OF: Lisa Green

4 DATE: July 16, 2003

5 IN THE MATTER OF: Business Options, Inc.

6 INSTRUCTIONS:

- 7 1. Please read the transcript of your deposition
- 8 and make note of any corrections or changes
- 9 on this Errata Sheet. DO NOT mark on the
- 10 transcript itself.
- 11 2. Indicate below general reason for change,
- 12 such as:
 - 13 A. To correct stenographic error.
 - 14 B. To clarify record.
 - 15 C. To conform to the facts.
- 16 3. Sign the Certificate of Deponent page.
- 17 4. Return this Errata Sheet, along with the
- 18 signed Certificate of Deponent page, within
- 19 30 days of the Date Sent, to the office
- 20 listed below for immediate forwarding to
- 21 other counsel in the case.

17 PAGE NO.	LINE NO.	CORRECTION	REASON

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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me.

Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

LISA GREEN

DOCKET FILE COPY ORIGINAL

IN THE MATTER OF: BUSINESS OPTIONS, INC.

Deposition of Lisa Green

July 16, 2003

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1 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
2 WASHINGTON, D.C. 20554
3 IN THE MATTER OF: * EB DOCKET NO. 08-85
4 BUSINESS OPTIONS, INC., * FILE NO. EB-02-TC-151
5 ORDER TO SHOW CAUSE AND * NAL ACCOUNT NUMBER:
6 NOTICE OF OPPORTUNITY * 30033217002
7 FOR HEARING * FRN: 0007179054
8 * * * * *
9 DEPOSITION OF:
10 LISA GREEN,
11 was taken Wednesday, July 16, 2003, commencing at
12 2:00 p.m., at the LaQuinta Inn, 8210 Louisiana
13 Street, Merrillville, Indiana, before Nova
14 Hollister, Notary Public.
15 * * * * *
16
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Page 3

1 I-N-D-E-X
2
3 EXAMINATION BY: PAGE:
4 Mr. Harkrader 4
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6 (NO EXHIBITS MARKED.)
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Page 2

1 APPEARANCES:
2
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13 FEDERAL COMMUNICATIONS COMMISSION
14 445 12th Street, S.W.
15 Washington, D.C. 20554
16 202-418-2955
17
18
19
20
21

Page 4

1 P-R-O-C-E-E-D-I-N-G-S
2 WHEREUPON --
3 LISA GREEN,
4 a Witness called for examination, having been
5 first duly sworn, was examined and testified as
6 follows:
7 DIRECT EXAMINATION
8 BY MR. HARKRADER:
9 Q. Will you state your name for the
10 record.
11 A. Lisa Marie Green.
12 Q. What's your work address?
13 A. 1443 East 84th Place.
14 Q. And what is the business that is
15 located at that address?
16 A. Avatar.
17 Q. What's your date of birth?
18 A. 3-14-71.
19 Q. You're employed by Avatar currently?
20 A. Correct.
21 Q. Was there a time when you were

Page 5

1 employed by Business Options, Inc. or Buzz
2 Telecom?
3 A. **Buzz Telecom.**
4 Q. When was that?
5 A. **In November.**
6 Q. And for how long were you employed as
7 a Buzz Telecom employee?
8 A. **Until January.**
9 Q. And in January, you became an Avatar
10 employee?
11 A. **Correct.**
12 Q. Did you change your place of business
13 at that time as well?
14 A. **Yes.**
15 Q. From the Buzz Telecom offices to the
16 Avatar offices?
17 A. **Uh-huh.**
18 Q. Where the Buzz Telecom offices
19 located?
20 A. **8380 Louisiana Street.**
21 Q. What is your position with Avatar?

Page 6

1 A. **Regulatory information officer and**
2 **consumer and employment affairs officer.**
3 Q. What are the responsibilities that go
4 along with that?
5 A. **With consumer and employment affairs,**
6 **I deal with consumer complaints that I get from**
7 **the Commission, the FCC lawyers. And I**
8 **investigate. And I would send the third party a**
9 **revocation along with any account information**
10 **that they request. I usually give them an**
11 **account summary, an invoice summary and I send**
12 **that to the Commission. And I carbon copy the**
13 **customer so they know that. And I'll get**
14 **requests from unemployment for employees. And I**
15 **just fill out whatever they need to know and pass**
16 **it back to them.**
17 Q. Okay. And has that been your policy
18 since January when you started with Avatar?
19 A. **Yes.**
20 Q. Do you have any other responsibilities
21 at Avatar?

Page 7

1 A. **The regulatory information officer.**
2 Q. What does that entail?
3 A. **That would be getting all states**
4 **legally licensed to operate under Buzz Telecom.**
5 **Doing annual reports, tariff revisions.**
6 Q. Uh-huh.
7 A. **Stuff like that.**
8 Q. What is the relationship between
9 Avatar and Buzz Telecom currently?
10 A. **Avatar is the legal department of Buzz**
11 **Telecom.**
12 Q. Are you an attorney?
13 A. **No.**
14 Q. What were your responsibilities when
15 you were first hired?
16 A. **When I was first hired, I was**
17 **regulatory information officer.**
18 Q. Did that entail the same
19 responsibilities that you just described that you
20 now have at Avatar?
21 A. **Uh-huh.**

Page 8

1 Q. You were responsible for annual
2 reports, tariff filings?
3 A. **Uh-huh.**
4 Q. When you first joined on at Buzz
5 Telecom, in how many states was Buzz Telecom
6 authorized to provide service?
7 A. **Probably -- I'm taking a guess -- 14**
8 **to 16.**
9 Q. Also at that same time, was Business
10 Options authorized to provide service in a number
11 of states?
12 A. **Yes.**
13 Q. How many states?
14 A. **We thought all, but it ended up there**
15 **was about nine states that had been revoked.**
16 Q. So would it be fair to say roughly 40
17 states?
18 A. **I would go with probably 38.**
19 Q. Thirty-eight. How did you hear about
20 the opening?
21 A. **The newspaper.**

Page 9

1 Q. Which one was that?
2 A. **The Times.**
3 Q. Is that the local paper?
4 A. **Uh-huh.**
5 Q. What areas does it cover?
6 A. **I'm not exactly sure. I think it's**
7 **pretty much northwest Indiana.**
8 MR. SHOOK: I'm going to interject
9 here. When you respond, I know when you say
10 "Uh-huh" or something like that, you mean yes or
11 no. Just to make sure that the record is clear,
12 try to respond either yes or no to a question
13 like that.
14 THE WITNESS: Okay.
15 BY MR. HARKRADER:
16 Q. Along the same line, there could very
17 well be some questions that I ask that you have
18 no idea what I'm asking. It's okay to say,
19 "Could you rephrase it?" Or "I don't
20 understand." If you don't know the answer to
21 some questions, it's okay to say "I don't know."

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1 A. **Okay.**
2 Q. When you first started with Buzz
3 Telecom, could you tell me what the relationship
4 was between Buzz Telecom and Business Options
5 when you first started working as an employee for
6 Buzz?
7 A. **When I first started working, I wasn't**
8 **clear about that.**
9 Q. Did you come to learn of the
10 relationship between those two companies?
11 A. **I was under the understanding that**
12 **they were beginning -- trying to start another**
13 **company, another long distance company aside of**
14 **Business Options.**
15 Q. Separate and apart from what Business
16 Options did?
17 A. **Correct.**
18 Q. Did you do any work on behalf of
19 Business Options when you first started working?
20 A. **No.**
21 Q. How did you apply for the opening of

Page 11

1 Buzz Telecom?
2 A. **I just went in with my resume and I**
3 **got interviewed.**
4 Q. Did you have to fill out an
5 application?
6 A. **Yes.**
7 Q. Who interviewed you?
8 A. **Gene Chill.**
9 Q. Anyone else?
10 A. **No. Well, Shannon Dennie did.**
11 Q. That same day?
12 A. **Yes. I came back that same day.**
13 Q. So you went in the morning and --
14 A. **Yes. I went in and before I got home,**
15 **Gene called and he told me he wanted me to come**
16 **back, that he wanted me to meet Shannon. So I**
17 **turned around and I went back and I met her.**
18 Q. Did they offer you the job that day?
19 A. **Yes.**
20 Q. And when did you start?
21 A. **I believe either the next day or that**

Page 12

1 **following Monday.**
2 Q. That's marvelously efficient. Did you
3 have any experience in the telecommunications
4 industry before you signed on at Buzz Telecom?
5 A. **No.**
6 Q. Did you have any experience with
7 interacting with regulatory agencies before you
8 signed on at Buzz Telecom?
9 A. **No.**
10 Q. Did you have any legal experience
11 before you signed on at Buzz Telecom?
12 A. **No. I was going to college.**
13 Q. What sort of training did you receive
14 with respect to the telecomm industry when you
15 started at Buzz?
16 A. **Not much. I read telecomm**
17 **terminology. And Shannon just trained me. And I**
18 **looked at other applications that were done. And**
19 **that's pretty much it.**
20 Q. Did you receive any training -- and it
21 may be the same thing. Did you receive any

Page 13

1 training with respect to dealing with regulatory
2 agencies?
3 A. No.
4 Q. Did you receive any training at all?
5 A. I trained with Shannon and that's
6 about it.
7 Q. Shannon is Ms. Dennie?
8 A. Right.
9 Q. It just needs to be clear for the
10 record.
11 A. Okay.
12 Q. Do you have any idea, when you first
13 started working at Buzz, how long Ms. Dennie had
14 been working there?
15 A. Yes.
16 Q. How long was that?
17 A. I believe it was approximately two to
18 three weeks.
19 Q. Before the time when you started?
20 A. When I started, uh-huh.
21 Q. Did Ms. Dennie train you or instruct

Page 14

1 you about tariff filings?
2 A. Yes.
3 Q. How did she do that?
4 A. She just had me -- she was showing me
5 the different tariffs. And she explained to me
6 that different states have different rules and
7 regulations in that they would have to be revised
8 to the state's rules and regulations. And I
9 looked through the state files, at the tariffs
10 that had already been filed for Buzz.
11 Q. Did you see any state filings on
12 behalf of Business Options?
13 A. I didn't work with Business Options at
14 all in the beginning.
15 Q. All your work was for Buzz Telecom?
16 A. Uh-huh. Yes.
17 Q. Did Ms. Dennie train you or instruct
18 you on how to communicate with Government
19 agencies?
20 A. No.
21 Q. Did you eventually learn or get

Page 15

1 experience in that area?
2 A. Yes. Just by talking to them.
3 Q. Talking to who?
4 A. To the commissions and regulatory
5 agencies.
6 Q. And just to be clear: We're talking
7 about state Public Utilities Commissions?
8 A. Right.
9 Q. And that would include the FCC as
10 well, the Federal Communications Commission?
11 A. Yes.
12 Q. When did you first speak with anyone
13 the Federal Communications Commission?
14 A. A week or two after I started.
15 Q. And when was that?
16 A. When exactly?
17 Q. A rough date. Was it November,
18 December?
19 A. It was in November, I believe.
20 Q. And who did you speak with?
21 A. John Mincoff.

Page 16

1 Q. Do you know a gentleman by the name of
2 Bill Brzycki?
3 A. No, I don't.
4 Q. Did you ever hear Ms. Dennie speak
5 about a gentleman by the name of Bill Brzycki?
6 A. Yes, I did.
7 Q. When was that?
8 A. When I first -- around the time I
9 first started.
10 Q. And what did she say about him?
11 A. She said that he was there no more
12 than three days before she started. So she had
13 to learn a lot of things on her own because there
14 wasn't enough time for him to explain or train
15 her to do anything.
16 Q. Did she tell you anything else about
17 him?
18 A. She told me that he told her that
19 there was a lot of things he forgot to do.
20 Q. Was he specific about that?
21 A. I remember her saying that he said

Page 17

1 he'd go home at night and say "I forgot to file
2 this or I forgot to do that." She wasn't
3 specific on exactly what documents he was talking
4 about. I know it's a lot.
5 Q. Did she tell you what his
6 responsibilities were generally?
7 A. **She told me that he was the head of**
8 **the regulatory department.**
9 Q. Which is the department that you were
10 working in at that time?
11 A. **Correct.**
12 Q. So did you understand from that, that
13 the filings that he was talking about -- did you
14 understand that the filings he was talking about
15 were state filings or Federal filings?
16 A. **No.**
17 Q. Did she talk about any specific
18 filings that he had mentioned forgetting?
19 A. **No. I don't think he did mention it.**
20 **And she didn't mention it to me.**
21 **(A short break was taken.)**

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1 Q. In November and December when you
2 started with Buzz Telecom, you had a
3 responsibility, did you not, for responding to
4 consumer complaints?
5 A. **No.**
6 Q. Did you ever obtain that
7 responsibility?
8 A. **Consumer complaints?**
9 Q. Yes.
10 A. **I took on that responsibility in**
11 **January, I believe, for about two months. And**
12 **then they hired somebody. And now I have that**
13 **responsibility again.**
14 Q. You do have it again?
15 A. **I have for the past month.**
16 Q. And when you took that responsibility
17 on in January, you were at Avatar; is that
18 correct?
19 A. **Correct.**
20 Q. So from January to March, and then you
21 got a couple months off and then --

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1 A. **I've been doing them for the past**
2 **month, month and a half now.**
3 Q. Why the time off?
4 A. **They hired somebody.**
5 Q. And what happened to that individual?
6 A. **She was laid off.**
7 Q. When you first started with Buzz
8 Telecom in November, were you responsible for
9 responding to state complaints?
10 A. **No.**
11 Q. Is it fair to say that you picked up
12 that responsibility in January, as well, when you
13 moved to Avatar?
14 A. **I'm sorry, I don't know what you mean**
15 **by "state complaints."**
16 Q. For example, when the state contacts
17 Buzz or Business Options -- or when the state
18 contacts Buzz and says that they may have slammed
19 a customer.
20 A. **No. I wasn't doing that.**
21 Q. Did you do that at any time?

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1 A. **Yes. From the times that I mentioned.**
2 Q. January to March?
3 A. **Yes.**
4 Q. For Avatar?
5 A. **I'm sorry, no. It's all been for**
6 **Business Options, the complaints. I**
7 **misunderstood. I thought you meant at Avatar.**
8 Q. When did you first start responding to
9 those types of state complaints? When were your
10 responsibilities to respond to state complaints?
11 A. **Toward the end of January.**
12 Q. So not in November or December?
13 A. **No.**
14 Q. And while you were -- when you
15 obtained those responsibilities, you were
16 employed by Avatar?
17 A. **Correct.**
18 Q. But it was for?
19 A. **Business Options.**
20 Q. Meaning, it was for complaints filed
21 by consumers with their state commissions?