

1 **Q. In reference to the evidence of Earl Ludlow, page 36, line 20, please advise if there is**
2 **a difference in response time during the period of regular shifts as opposed to the**
3 **time there is no regular shift on duty.**
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5 A. The Company's System Control Centre is staffed 7 days a week, 24 hours a day, to
6 monitor the system and to receive and dispatch trouble calls. In order to respond to calls
7 during periods outside of regular shifts, the Company utilizes an employee on-call
8 system. At any one time the Company will have a total of approximately 30 staff on-call
9 at its 8 area and 14 district locations to respond to customer calls as required. As well the
10 Company has staff on-call in St. John's to respond to system problems.
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12 During time periods when there is no regular crew shift on duty, the Company's on-call
13 staff will respond to customer calls as they would during regular shifts. There is no
14 significant difference in response time between these two periods.