

Question		Reason for not providing an answer
4.1	Please provide full details of any instances in the last 3 years where Post Office, Bank of Ireland or Wincor Nixdorf detected an attack against a branch ATM using either malware or hardware devices. Please describe the technical measures in place to prevent or detect this type of attack.	<p>Disproportionately wide request for general information, without identification of a specific issue raised by Applicants.</p> <p>Note: suggestion that we use the above language throughout.</p> <p>The latter part of the question has already been addressed in Post Office's paper on ATMs.</p>
4.4	In circumstances where the Bank of Ireland generates incorrect ATM cash dispensed figures for both the branch's ATM and in the figures supplied directly to Post Office, please describe the controls and procedures in place to detect and investigate this type of error	This question has already been addressed through correspondence with Second Sight around Suspense Accounts
4.6a	Any investigation in the last 3 years in which a technical fault was discovered with the ATM which produced a shortage when balancing the ATM or a loss on the Horizon ATM stock unit. How was the associated loss dealt with by Horizon?	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
4.6b	Any escalated investigation in the last 3 years relating to unresolved cash discrepancies involving a branch ATM	<p>Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants</p> <p>There will have been hundreds if not thousands of queries raised with NBSC and FSC regarding ATM accounting. To collate this information would require a review of all calls to NBSC and FSC regarding ATMs – this would be a massively disproportionate exercise given that Second Sight has not identified the specific issue it wishes to review.</p>
4.6c	Any instance in the last 3 years in which Post Office, Bank of Ireland or Wincor discovered that any of their authorised engineers or representatives had stolen cash from any branch ATM	<p>Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants</p> <p>NOTE: Could we get POL and BOI to confirm that there have been no incidents involving branches? POL security should know the answer to this.</p>
4.6d	Any instance in the last 3 years in which Post Office initially determined that a cash loss was attributed to a Subpostmaster but where it was subsequently found that the Subpostmaster was not responsible for the loss	<p>Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants</p> <p>Note: I think we could fudge the answer to this as follows:</p>

		As explained to Second Sight previously, Subpostmasters can challenge any cash loss or transaction correction in their branch in relation to ATMs. In many circumstances the information needed to determine the cause of a discrepancy is only held by a Subpostmaster. There will therefore have been occasions when a transaction correction against a Subpostmaster has been challenged and reversed – this is however standard operating practice.
4.6f	Any instance in the last 3 years in which Post Office, Bank of Ireland or Wincor became aware of a customer receiving more cash than they were entitled to from an ATM. Please also provide full details of how the resultant cash shortfall was dealt with in the branch's ATM/Horizon balancing process and whether any Subpostmaster was held accountable for losses that were later found to be attributable mechanical problems with an ATM;	This question has already been largely answered in POL's paper to Second Sight on ATMs which explains the processes used to detect, and protect branch's from, third party fraud. The request for general information on the occurrence of certain events, without identification of a specific issue raised by Applicants is disproportionate. Post Office would be happy to provide more detailed information on any specific example put forward by Second Sight.
4.6h	Any instance in the last 3 years in which Post Office, Bank of Ireland or Wincor has become aware of any theft relating to an ATM, that was carried out (or suspected of having been carried out) by any person other than a Subpostmaster or a branch employee. Please also describe the accounting treatment of any associated loss	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants  Note: again Rob King may be able to answer this.
5.1	Please provide full details of any instance in the last 3 years in which any Post Office or Camelot employee or representative has been found to have stolen Scratchcards or any other Lottery products/prizes.	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants  Note: again Rob King may be able to answer this.
5.5	Prior to the changes made to Standard operating Procedures in February 2010, and the subsequent implementation of 'Ping' in February 2012, did Post Office find that many branches were making similar mistakes in regard to processing Scratchcards? Please provide full details of the types of mistakes that were routinely being made. Please also provide a schedule showing for each month, how many TCs were issued and of what aggregate value (separating TC Invoices from TC Credits) during the years 2005 - 2011 in respect of Lottery matters?	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
6.3	Allegations have been made about unauthorised access to transaction data by staff located at the Fujitsu office in Bracknell. As previously requested and agreed, please provide the email archives in PST or NSF format for Post Office staff working in Bracknell during 2008.	This matter has already been addressed in Spot Review 5 and also subsequently in the Post Office Investigation Report for the Applicant whose case Second Sight reviewed in Spot Review 5. Second Sight were also sent previously a draft witness statement from a Post Office employee which made it clear that there was no capability to access or alter live branch data

7.3	Please provide us with a schedule listing all TC's issued to branches in the last 12 months relating to this type of adjustment.	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
7.4	Please provide us with a schedule listing all amounts received back from any bank, in response to that reconciliation process in the last 12 months, clearly describing the accounting treatment of those amounts	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
7.5	We are aware that in some circumstances a customer may benefit from a duplicated transaction. Please provide full details for any such instances that have been occurred in the last 3 years and state whether any Subpostmaster was held accountable (during any period beyond the end of a Trading Period) and required to make good the resultant shortfall	This question has already been addressed through correspondence with regards to 'One Sided Transactions'
7.6 (second Sentence)	Please provide details of the anticipated cost savings associated with this process change together with the estimates of increased financial risk i.e. the cost benefit analysis carried out by Post Office.	Requesting general information, without reference to it being raised by Applicants
7.7	Please provide us with a schedule showing the monthly volumes (and the aggregate values) of EN/TC Invoices compared to Credits that were issued to branches, in regard to Giro payments and Girobank Deposits and Withdrawals, in the years 1999 – 2013	Requesting general information, without reference to it being raised by Applicants
7.11	We are aware that if the root cause of a lost cheque is unknown or attributed to some other cause outside the branch, Post Office will absorb this loss and not pass it on to the Subpostmaster. Please provide monthly totals showing the aggregate of all such losses in the years 1999 - 2013, describing how much of that loss was absorbed by Post Office and how much was passed on to Subpostmasters	Already answered – Post Office has already explained to Second Sight that lost cheques cannot be the cause of loss to a branch unless it can be shown that the branch is at fault. As Second Sight accepts this explanation, this request is disproportionate.
7.13	We are aware that processing or technical failures can occasionally give rise to 'one-sided' transactions. We are also aware that Post Office has stated that 'in any event a branch will never be liable for an error caused by a 'one-sided' transaction'	POL has already provided responses to the two examples Second Sight previously supplied
11.3a	Any surveys or other quality control procedures in order to measure user satisfaction with regard to the NBSC and HSD Helplines	Out of scope Note: we may be able to answer this one.
11.8	Please provide full details as to the consequences of introducing 'Monthly Trading' periods. For example, did Post Office notice an increase in the number of branches suffering discrepancies that led to contract termination?	Requesting general information, without reference to it being raised by Applicants Note: we would need to check but I think we could probably answer this by saying: "From our enquiries, we do not believe that POL holds this information."
11.9	We understand that when Post Office moved to Monthly Trading, Branch Suspense Accounts thereafter had to be closed out to zero at the end of each Trading Period. Please provide full details of options available to a Subpostmaster dealing with the investigation of a loss just before the end of a Trading Period.	This is answered in Section 9 of Second Sight's Part 1 Briefing

12.1a	Any insurance coverage Post Office has ever offered to arrange for its Subpostmasters	Out of scope
12.2	We understand that many Subpostmasters have only signed the one-page 'Acknowledgement of Appointment' Letter and not necessarily been provided with a copy of the Contract. Please describe the basis upon which Post Office considers the Contract enforceable in these circumstances?	Out of scope
12.3	We understand that Post Office considers the terms of the Contract to be broadly similar to those used in franchising arrangements across the UK. Please provide full details evidencing this proposition?	Out of scope
12.5	Several Applicants have reported their concerns that Post Office employees acted inappropriately in connection with the closure of transfer of their branches. The inference of the majority of the remarks made is that certain Post Office employees acted unprofessionally, either by leaking confidential information (that was damaging to the Applicants) to potential buyers and/or by thwarting their efforts to sell a viable branch until it was no longer viable (and consequently of lower value).	Out of scope
12.6	The further inference is that certain Post Office employees seemed to be in some way motivated or incentivised to find reasons to close branches, that were already destined to close under the various closure and re-invention programmes, without cost to Post Office	Out of scope
12.7	Please provide full details of the work performed to refute these 'bad faith' allegations	Out of scope
13.1	Please provide full details of any criticism of Post Office's (or Royal Mail's) investigative actions or of its employees in any Court judgement or ruling	<p>Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants</p> <p>Note: I think we can answer this because there are no judgments in criminal cases and there are only very few written judgments in civil cases. Paul – can you check with Rodric to see if he is aware of any criticism of this nature being levied at POL. If not, we could answer this as follows:</p> <p>"We are not aware of any such criticism".</p>
13.2	Please provide a schedule showing the number of requests from Subpostmasters for assistance in investigating discrepancies their branch's accounts for each of the years 1999 – 2013. Please also show for each year the number of requests when assistance was provided	<p>Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants</p> <p>Note: Possible alternative wording:</p> <p>Post Office does not hold this information. To undertake this exercise would require POL to review 14 years of calls to NBSC and HSD which would amount to millions of calls. This request is clearly disproportionate.</p>

13.3	Please provide a schedule showing the number of investigations into branch surpluses or shortfalls for each of the years 1999 – 2013 clearly setting out the number of investigations in each category	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants  See answer to question 13.2
13.4	In relation to requests for assistance, we understand that, where several instances of the same problem occurs, a 'problem record' is created and the root cause of the issue is identified and fixed (i.e. to avoid further instances). Please provide a schedule of all significant 'problem records' and all process and software modifications (excluding "minor amendments to processes") that have been implemented, in the years 1999 - 2013, that were designed to reduce the frequency and impact of "errors made at the counter	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
13.5	Please provide full details and results of any user satisfaction surveys Post Office has conducted into the Horizon system	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
13.6	We understand that many of the unexplained branch losses are attributed to "errors made at the counter". Please provide a schedule showing the number and value of unexplained branch losses or "errors made at the counter" for each month for the period 2008 to 2013. Please also provide similar information relating to Crown Branches including the amounts written off each month	Post Office does not hold this information.  Note: As far as I am aware, POL does not categorise losses in this manner.
13.7	Please provide a schedule showing the number and value of ENs and TCs issued to branches for each of the years 1999 to 2013 (we need to see separate volumes and values for Credits and Invoices).	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
13.8	Please provide full details of changes to the Horizon system and/or to its Standard Operating Procedures that were designed to reduce the risk, incidence and severity of errors and fraud, as a direct result of investigations carried out into unexplained branch shortfalls, or in response to problems, vulnerabilities and susceptibility to errors or fraud, for the years 1999 – 2013	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants.  This would require a complete review of every technical change to Horizon over a 14 year period of which there will have been thousands. Putting aside the fact that Second Sight does not have the technical expertise to analyse this data, this request is clearly disproportionate.
15.1	Please provide full details of all Suspense Accounts held by Post Office. Please also provide a schedule, for each year end between 2008 and 2013, showing the amounts transferred to Post Office's Profit and Loss Account (both debits and credits) for each Suspense Account held	Note: we have this information so should be able to answer this.
15.2	Please also provide a schedule, for each year end between 2008 and 2013, showing the balance held on each Suspense Account (both credits and debits).	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants

15.3a	Please provide an electronic report in CSV format or similar showing for the last 3 years the following information for every item posted to any Suspense Account: Full Transaction details	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
15.3b	Please provide an electronic report in CSV format or similar showing for the last 3 years the following information for every item posted to any Suspense Account: Originator's reference	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
15.3c	Please provide an electronic report in CSV format or similar showing for the last 3 years the following information for every item posted to any Suspense Account: Any comments or notes associated with the transaction	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants
15.3d	Please provide an electronic report in CSV format or similar showing for the last 3 years the following information for every item posted to any Suspense Account: d) Full account details of the account the transaction relates to or is being transferred to	Requesting general information on the occurrence of certain events, without reference to it being raised by Applicants