FUJ00121554

FUJITSU SERVICES POST OFFICE ACCOUNT

Response to The Expert's Reply to Fujitsu Services' Submission

Background

The Expert has responded to the letter we sent to Post Office dated 20th February 2004 in response to his Expert Report dated 20th January 2004. Essentially he has not accepted any of our explanations and has refused to change the original opinion expressed in his report.

The solicitors have advised Post Office that the matter will now be committed to trial and that Post Office witnesses may be called. Post Office has in turn notified Post Office Account that we may have to provide expert witness to testify against his opinions.

I have spoken to Jim Cruise (Post Office Case Manager) and we both feel that there is probably another opportunity to influence the Expert's opinion by inviting him to Post Office Account locations (FEL01, BRA01, STE04) and providing him with access to data, records and people who can deal with his observations directly.

Detail Response

Using the headings as presented in his report :

Horizon System Helpdesk

I do not agree with his assertion since he has made claims about Fujitsu only dealing with symptoms and not causes. The primary objective of the HSH, as explained in our original submission, is to provide such assistance as is possible in the short term and to return the Outlet to normal business as rapidly as possible. Advice to reboot is the most effective way of doing this. It is not the function of the HSH to analyse crashdumps while on the 'phone to Post Masters.

He cannot dismiss the explanation in this way as he has expressed a negative opinion on the modus operendi.

Transaction Handling on Reboot

What was offered in our reply was a statement of fact. We can, if allowed, demonstrate that this happens but it would be for another Outlet, not Cleveleys, and the system build status would not be as it was in 2000. Any supporting audit data has been deleted through normal operating procedures.

Reasonabless of Calls

It is unfortunate that his tone suggests that we have only found this data in order to respond to his report, since this is not true and suggests that we deliberately withheld information.

Data that is provided to Post Office in support of investigations and prosecutions is derived from a controlled audit archive. HSH data from this source would indicate the numbers of calls raised but not their content or final disposition. Under the contract this data would be deleted 18 months after it was originally written. It would be to this source that Fujitsu would turn to service requests from Post Office Investigations.

However, the original HSH call Powerhelp transcript is maintained in an uncontrolled (in the sense of evidentially admissible) archive and this can be made available to the Expert at our Bracknell office, if he so wishes. From this archive he can obtain details of calls made by similar profiled Outlets at the same time and draw his own conclusions as to whether Cleveleys was unusual or not.

Similarly, the raw data for the analysis provided in our reply was derived from an uncontrolled database. Again, the Expert can have access to this database, again at Bracknell, and can draw his own analysis of the available data.

With regard to his specific comparisons of mean numbers I can only say that he has selectively identified those that show Cleveleys in a poor light and ignored those other Outlets whose results exceed those for Cleveleys. For example Darwen made more calls about hardware and Colwyn Bay more about software.

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Finally, we dispute whether a comparison with a mean has any relevance. Only the total number of call made in the categories has value since all Outlets were running the same system and would have been transacting similar profiles of business. As such other factors including, but not limited to, PM training, basic capability and the attitude towards raising calls have a part to play.

Operator advice to Reboot

It will not be possible to provide the 'crashdumps' that the Expert refers to since these will have destroyed. Again, the Expert can have access to the Horizon System Helpdesk in Stevenage where he can talk to the relevant people and follow the support line from 1st to 4th line. Since we cannot provide the absolute evidence relating to Cleveleys in 2000 we can at least assure him of the support and problem resolution activity that goes on behind what could be construed as a simplistic 'reboot and continue' piece of advice and it would be wrong to assume that that was the end of Fujitsu's responsibilities in resolving problems.

Defective Equipment

We would need to understand the basis for the opinion but as stated in our original response the statement is subjective, not supported by evidence and we would reject it.

Worrying Discrepancies

We need to consider the specific calls that the Expert is referring to. It should be noted that in all cases the Post Master was happy to close the call before it was closed by the HSH.

Call 10253234

Referenced by the Expert in respect of 'large discrepancies'. A full review of the call shows that on 25/10/00 the PM reported the problem and was provided with guidance to resolve the problem within 45 minutes. The PM (male) agreed to call back when this advice had been followed. On 31/10/00 the PM (female) rang wanting to know what was happening to the call. On 01/11/00 the HSH called the PM who was too busy to talk but who later that day rang back to say that the problem had been resolved the previous week when the transaction was reversed through normal operational procedures.

Call 10311359

Referenced by the Expert in respect of 'minus figures'. Again, advice on resolving the call was given immediately and the call was closed after the PM had followed normal operational procedures to resolve the problem.

Call 11084045

Referenced by the Expert in respect of 'system freezing'. I suspect the Expert was pointing out the poor response provided by the HSH in this instance.

Call 11012223

Referenced by the Expert in respect of 'intermittent problem following system upgrade'. There are two issues here. One was the unfortunate statement to the effect that the problem occurred after the Counters were upgraded on 23/10/00 (Release CSR). The second was that the problem was already known about and closed using a Known Error Log that would challenge the Expert's opinion that POA does little to analyse and resolve problems other than to recommend a reboot.