

Witness Statement*(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)
and 5B, MC Rules 1981, r 70)***Statement of Andy Paul Dunks**

Age if under 18 Over 18 (If over 18 insert 'over 18')

This statement (consisting of –5– pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe true.

Dated the 21st day of April 2006

Signature

I have been employed by Fujitsu Services, Post Office Account, formally ICL Pathway Ltd., since the 11th March 2002 as an IT Security Analyst where I am involved in IT Security for the Post Office Account I am authorised by Fujitsu Services to undertake extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.

I have been asked to provide details and information on the reports of monitor faults, polling failures, equipment failures and calls for advice and guidance logged by the Horizon System Helpdesk recorded during the period 1st January 2002 to the 28th February 2003 for the **Rugeley Post Office – FAD (Financial Accounting Division) Code 264242**

I have reviewed the helpdesk calls pertaining to this office and during the period 1st January 2002 to the 28th February 2003 there were 28 calls from Rugeley Post Office – FAD Code 264242 to the Helpdesk. I am of the opinion that none of these calls relate to faults which would have had an effect on the integrity of the information held on the system.

Details and an overview of the calls are given in date order below:

Tue 22 January 2002 10:15, Call Reference E-0201220222 – Pm (Postmaster) rang to say that BCR (Bar Code Reader) on counter position 5 is not working. **Resolution:** Replaced BCR due to intermittent scanning.

Thu 07 February 2002 08:54, Call Reference E-0202070136 – pm reports, problem with keyboard, no lights on keyboard. **Resolution:** Engineer Reconnected keyboard and rebooted counter. Tested ok

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Continuation of statement of Andrew Paul Dunks

Fri 22 March 2002 11:31, Call Reference E-0203220332 – PM reports that they can not process Quantum Gas cards. The system keeps saying that "This smart card type can not be processed by Horizon please contact the Horizon helpdesk. **Resolution:** System accepted the cards after a short while.

Sat 23 March 2002 09:27, Call Reference E-0203230102 – Clerk reports that the orange light is on permanently on the keyboard.. **Resolution:** Reboot was successful.

Wed 01 May 2002 11:36, Call Reference E-0205010477– Fad has not polled (no connection with data centre) for 1 day, please investigate. **Resolution:** Gateway counter rebooted and site now communicating.

Thu 09 May 2002 11:41, Call Reference E-0205090550 – pm reports that there is a problem with the counter printer. **Resolution:** Engineer Replaced printer as unable to read print. Tested ok

Thu 09 May 2002 14:38, Call Reference E-0205090822 – pm says he is having trouble with the counter printer on counter 2. **Resolution:** Engineer replaced printer.

Thu 06 June 2002 10:53, Call Reference E-0206060479 – Pm reports that he had a power failure for about an 1hr & the power has just come on. PM cannot reboot 3 counters. **Resolution:** Engineer replaced base unit and tested OK.

Thu 06 June 2002 11:57, Call Reference E-0206060591 – Pm has reported that following a power cut and subsequent reboot that the counter is going into a loop when trying to start up. **Resolution:** SWAPPED BASE UNIT DUE TO IT BEING STUCK IN A BOOT- UP LOOP.

Thu 06 June 2002 12:05, Call Reference E-0206060604 – Pm has reported that following a power cut and subsequent reboot that the counter is going into a loop when trying to start up.. **Resolution:** SWAPPED BASE UNIT DUE TO IT STUCK IN A BOOT-UP LOOP.

Thu 06 June 2002 12:08, Call Reference E-0206060610 – Pm has reported that following a power cut and subsequent reboot that the counter is going into a loop when trying to start up. **Resolution:** Engineer swapped out base unit.

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Wed 19 June 2002 19:03, Call Reference E-0206191494 - Critical NT error @ 18.00pm 19/06/02 - Host h26424200104 - A fatal I/O error has occurred: Incorrect function (0x1). The message store will be shut down abnormally. **Resolution:** Engineer swapped out counter and tested ok.

This is a known error which is automatically generated and a description of the symptoms, problem and solution are kept on the KEL (Known Error Log) database ref: KEL PSteed1718Q, and points to a Hard Disk fault (Hardware)

Thu 27 June 2002 08:38, Call Reference E-02060270082 – Auditor Glynn Burrows requests a OSP (one shot password). **Resolution:** OSP given.

Thu 27 June 2002 15:14, Call Reference E-0206270829 – Auditor reports pm has rolled over stock unit and has a discrepancy in foreign currency, foreign sterling equivalent. **Resolution:** pm reports that he rolled over stock unit and needs to amend declared amount for foreign currency – advised NBSC (Network Business Support Centre).

Sun 18 August 2002 05:31, Call Reference E-0208180022 – Critical event received @ 04:06 on node H26424200108 - A fatal I/O error has occurred: Data error (cyclic redundancy check) (0x17). The message store will be shut down abnormally. **Resolution:** Counter rebooted and monitored, no more critical events received, since reboot, closing call

Tue 27 August 2002 07:07, Call Reference E-0208270019 – CRITICAL. Event Text on counter: 'The device, \Device\Harddisk0\Partition1, has a bad block'. **Resolution:** Closing call as no repeat event after Counter 8 successfully rebooted.

This is a known error which is automatically generated and a description of the symptoms, problem and solution are kept on the KEL (Known Error Log) database ref: KEL PCarroll2917J.

Thu 05 September 2002 04:26, Call Reference E-0209050010 Critical event received @03:33 on counter 8; The device/Device\Harddisk0\partition1, has a bad block. **Resolution:** No recurrence of event following reboot,

This is a known error which is automatically generated and a description of the symptoms,

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problem and solution are kept on the KEL (Known Error Log) database ref: KEL PCarroll2917J.

Thu 12 September 2002 12:03, Call Reference E-0209120642 – pm reports that counter printers 4 & 5 are not printing MLP (Mail Label Printing) or giro slips **Resolution:** Engineer replaced printer on counter 4.

Thu 12 September 2002 12:48, Call Reference E-0209120723 – pm is having problems with counter printer on node 5 as it will not take giros or mail labels. **Resolution:** Engineer swapped printer on counter 5.

Fri 13 September 2002 15:34, Call Reference E-0209130737 – pm reports that her system has frozen while doing an AP (Automated Payment) transaction. **Resolution:** Screen had been frozen for a few minutes adv pm to reboot pm happy to reboot unassisted.

Fri 18 October 2002 04:34, Call Reference E-0210150012 – CRITICAL NT_Error at 3:42 "The device, \Device\Harddisk0\Partition1, has a bad block. **Resolution:** Swapped base on node 8 as requested by SMC due to out of date firmware.

This is a known error which is automatically generated and a description of the symptoms, problem and solution are kept on the KEL (Known Error Log) database ref: KEL PCarroll2917J.

Fri 08 November 2002 10:44, Call Reference E-0211080301 – PM reported that BCR isn't working on node 2 **Resolution:** Advised to do a controlled reboot, and test after logged in after reboot advised to call back if problem persists, Call closed.

Mon 25 November 2002 10:35, Call Reference E-0211250242 – Pm reports that she is had all systems unplugged at the weekend and that she cannot plug in the printer and it seems broken. **Resolution:** Engineer reconnected cables to printer and tested ok.

Tue 17 December 2002 17:14, Call Reference E-0212170787 – PM reports that counter printer won't do the Giro slip **Resolution:** advised to clean the front feed slot, call closed.

Sat 04 January 2003 05:44, Call Reference E-0301040032 – Node 6 generated critical event error @ 03:51 stating: Error Message: PIN Pad not initialised. Reason: PIN Pad not accessible. **Resolution:** PIN PAD had lost connection with counter, no further events. Call closed.

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Tue 14 January 2003 08:38, Call Reference E-0301140059 – Auditor requires OSP asap with full access. **Resolution:** Provided osp access to auditor successfully.

Tue 14 January 2003 13:30, Call Reference E-0301140482 – requires osp. **Resolution:** User did not call for authorised osp.

Tue 18 February 2003 08:56, Call Reference E-0302180078 – PM states she was working on the Horizon kit and all the lights have gone off. **Resolution:** Advised PM that she would need to check the trip switch and if no joy then to get an electrician out to check the electrics. ref offered.

The calls **E-0208180022, E-0208270019, E-0209050010, E-0210150012 and E-0301040032** referrer to a “critical event”. The term critical is the comparative level of attention required to generate remedial action. It refers to the level of attention required on a grading system for example critical high level of attention or warning would be medium level of attention. These critical events occurred outside the Post Office opening times and a standard action of a reboot of the system, which would also highlight any further issues, was undertaken and repaired the problem and confirmed stability of the system. The term bad block refers to an area of the hard drive, which the operating system has identified as no longer useable for data storage. I should add that this area is not my particular area of expertise. I have a general knowledge of these procedures and have made the comments above to aid the court.

At various times on the 21st April 2006 hardcopy printouts of the 28 calls detailing the information recorded on the helpdesk database for the required date period were produced. I now produce the hardcopy printouts as Exhibit APD/01.

Any records to which I refer in my statement form part of the records relating to the business of Fujitsu Services. These were compiled during the ordinary course of business from information supplied by persons who have or may reasonably be supposed to have personal knowledge of the matter dealt with in the information supplied, but are unlikely to have any recollection of the information or cannot be traced. As part of my normal duties, I have access to these records.

Signature

Signature witnessed by