

Document comparison done by Workshare on 04 October 2006 14:51:21

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Document 2	iManageDeskSite://DMSPLY1/1A-PLYMOUTH/1209986/3
Rendering set	bp2 - basic - colour

Legend:	
<b>Insertion</b>	
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Statistics:		
	Count	
Insertions		10
Deletions		10
Moved from		0
Moved to		0
Style change		0
Format changed		0
Total changes		20

Filed on behalf of the: Claimant  
Witness: Andrew Paul  
Dunks  
Statement: 1  
Exhibits: "APD1"  
Date made: ~~27/9~~10/06

**IN THE HIGH COURT OF JUSTICE  
QUEENS BENCH DIVISION**

**Claim No. HQ05X02706**

**BETWEEN:**

**POST OFFICE LIMITED**

**Claimant/Part 20  
Defendant**

**- and -**

**LEE CASTLETON**

**Defendant/Part  
20 Claimant**

**WITNESS STATEMENT OF ANDREW PAUL DUNKS**

**I, ANDREW PAUL DUNKS** of Fujitsu Services, Lovelace Road, Bracknell, Berkshire, RG12 8SN **WILL SAY AS FOLLOWS:**

1. I have been employed by Fujitsu Services (**Fujitsu**), Post Office Account, since 11 March 2002 as an IT Security Analyst where I am involved in IT Security for the Post Office Account. I am authorised by Fujitsu to undertake extractions of audit data held on the Horizon system and to obtain information regarding system transaction information processed on the Horizon system.
2. I make this Witness Statement from facts within my own knowledge unless otherwise stated. References to page numbers in this Witness Statement are to page numbers of Exhibit "AD1" to this Witness Statement. Any records to which I refer in my statement form part of the records relating to the business of Fujitsu. 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, since the nature of the helpdesk involves many engineers all at differing levels and any number could be involved in a particular call. As part of my duties, I have access to these records, but I was not involved with any of the technical aspects of these calls. This area is not my particular area of expertise and I make this witness statement simply to help clarify the call logs for the benefit of the Court.

3. An important element of the support provided to subpostmasters and Counter Clerks is the Horizon System Helpdesk (**HSH**). The HSH is the Horizon user's first 'port of call' in the event of their experiencing a problem with the Horizon system or requiring advice and guidance. If the system were to malfunction, upon discovery the Horizon users (i.e. the sub-postmaster or counter clerk) would raise a call to the HSH seeking clarification or advice. HSH is a service run by Fujitsu Services for the Post Office. I have been asked to provide details and information on the calls for advice and guidance logged by HSH recorded during the period 1 December 2003 to 23 April 2004 for the 14 Marine Drive South, Bridlington Post Office – FAD (Financial Accounting Division) Code 213337 (**the Marine Drive branch**)
4. I have reviewed the HSH calls pertaining to the Marine Drive branch and during the period 1 December 2003 to 23 April 2004 there were 23 calls from the Marine Drive branch to HSH (5 of which occurred after 23 March 2004 when I am informed that Mr Castleton was suspended). Details and an overview of the calls are given in date order below:

#### **HSH Call Logs**

5. **9 December 2003, 9.54am, call reference e-0312090261** (page 1) The sub-postmaster had a power blip following which, the keyboard was not accepting the PMMC card, which is used by sub-postmasters to log onto their terminal. The Post Master was advised to reboot his terminal. He rebooted, inserted his PMMC/pin and was happy to continue. The call was then closed.
6. **20 January 2004, 2.05pm, call reference e-0401200574** (pages 2 to 3) - this is a log simply to record that there was an upgrade to the network line connection from dialup (Integrated Services Digital Network (**ISDN**)) to a broadband connection (Asymmetric Digital Subscriber Line (**ADSL**)). This was a

scheduled visit to the Marine Drive branch to install broadband. The upgrade was completed, but the broadband was not turned on at that time.

7. **28 January 2004, 11.13am, call reference e-0401280325** (page 4) - the call was taken by Dane Meah at HSH from the caller who stated that there were discrepancies going through the system for three weeks in a row. The caller was advised that the problem would need to be thoroughly investigated by the National Business Support Centre (**NBSC**) before the issue could be investigated as a software problem and the caller was transferred to the NBSC and the call closed.
8. **29 January 2004, 10.26am, call reference e-0401290358** (page 5) - a call was taken by Mary Rainbow at HSH. The sub-postmaster reported that he was having problems on his system connected to remittances (**REMs**). The Sub-postmaster has to enter a remittance when he receives a delivery of new stock. He stated that every time he entered in the new stock, it left him with a discrepancy. The Sub Post master was transferred to the NBSC, since this was a business issue and the call was closed.
9. **2 February 2004, 8.49am, call reference e-0402020111** (pages 6 to 7) - Ben Horseman at HSH took a call from Cath at NBSC ~~who stated that.~~ It appears from the call log that the sub-postmaster reported terminal (node) 2 had failed to initialise and that ~~he also has~~ there were messages on his computer screen stating "operational integrity violation has been detected" and "unable to connect to the repost service". The sub-postmaster was advised that he would be called back whilst the counter ~~is~~was reviewed. Both counters had been upgraded with ADSL (Broadband). During the night it is sometimes required that some of the services on the counters are stopped and restarted, in this case it was unable to reconnect to the Repost service after it was stopped. The Sub-postmaster called back at 9.18am and was advised to reboot, which did not fix the problem. It was recommended that an engineer swap or adjust the base unit on terminal 2. An engineer was sent out to sort out the base unit. The engineer arrived on site at 1.30pm, replaced the ~~node~~base unit (this is the box in which a computer's hard drive is contained) and the call was closed.

10. **13 February 2004, 10.41am, call reference e-0402130261** (page 8) – call was taken by John Lockyear at HSH. The sub-postmaster had stated that he had a rem issue and this was referred to NBSC. The call was then closed.
11. **13 February 2004, 10.46am, call reference e-0402130267** (pages 9 to 10) – this call was taken by Tony Law at HSH, referred from Marie at NBSC. The sub-postmaster had stated that his system was doubling up cash declarations and cutting off cheques, yet they still apparently appeared the next day. NBSC advised that they had checked that he was cutting everything off properly and that the ~~cash~~ cash figures were being done correctly. The sub-postmaster had insisted on a system check being carried out. He said that the problem had been happening for five weeks and that every time stock had been remmed in, they had a loss that night. The sub-postmaster also stated that the cheques he had recorded on the 10<sup>th</sup> were showing on the 11<sup>th</sup> February as well.
12. The call was escalated to Heather Dryden at HSH. As a sub-postmaster is supposed to send cheques to the EDS Processing Centre each evening, the next day you would expect to see the cheque figures cleared to zero on the Horizon system. The sub-postmaster, initially stated that this had happened more than once, but when Heather went through his cheques, it had happened just the once. It appears that the sub-postmaster forgot to cut off and the cheque listing had two days worth of cheques in it. There is no option to cut off retrospectively ie if the sub-postmaster reveals that he has not cut off the previous days cheques, they will show up the next day and a failure to cut off previously cannot be corrected later. However, the point is that the system will not put the cheques in the balance and process them twice. It will reconcile each cheque against the transaction.
13. **16 February 2004, 8.32am, call reference e-0402160081** (page 11) – David Lawrence at HSH took a call from Marie at NBSC. The sub-postmaster had called NBSC to state that both his terminals were at Post Office Log On (**POLO**), but were rebooting ok subsequently. The call was therefore closed.
14. **16 February 2004, 11.12am, call reference e-0402160628** (page 12) – Tony Law took a call from Pat at NBSC. The sub-postmaster had stated that he needed an OBCS check. This is the bar code reader that each sub-postmaster has at their

terminal and was used for pension books. If the Pension book is not local to that Post Office branch then a check is requested to ascertain if the book has been stopped i.e whether they can pay out on that pension book. The OBCS was checked and the results given. The call was then closed.

15. **25 February 2004, 11.03am, call reference e-0402250454** (pages 13 and 14) – A call was taken by Mary Rainbow. The clerk reported that they had been having problems on the system with balancing that week, which seemed to be related to stock being remmed in through the week. The clerk reported that over the past 7 weeks, they ~~have~~ had losses every week and at one point they had a problem with cash on hand, but they found that this was an issue with ID numbers that had been resolved. The clerk also reported that last week when they rolled over they put a loss into the suspense account and then took the computer terminal back to the trial balance which came out with a zero net discrepancy to start the new week with. The clerk reported that she had printed out a balance snapshot on Monday and that looked OK, but since then they had remmed in some stock which appears to have given them a loss.
16. The clerk was advised that she would need to check her stock position for last week and then check her remms in summary. This would show the stock that she should be holding and that figure could be compared with the stock showing in the adjust stock (Stock Check) and this would highlight any problems with the stock on hand. The clerk was advised that we would need her to take her computer terminal to trial balance this evening and come back to us before she rolls over so that we can take down any details she can give us. The clerk confirmed that they are working on a shared stock unit and would call back if further assistance was required. The balance sheet would show the old discrepancy until they can do a trial balance. The call was then closed.
17. **25 February 2004, 12.03pm, call reference e-0402250553** (page 15) – the call log states that the call was taken by Robert Congerton. The clerk had told the NBSC she had problems regarding the balance. The NBSC were advised that HSH had told the PM to call back tonight when they had a net discrepancy on the cash account. The call was then closed.



18. **25 February 2004, 12.12pm, call reference e-0402250565** (page 16) – Call was taken by Nicola Goodson at HSH. Jane at the NBSC had a call in relation to a call that had been closed.
19. **25 February 2004, 4.56pm, call reference e-0402251011** (pages 17 to 18) – Call was taken by Niall Vincent, because a critical event was seen stating “error message. An error has occurred = see the audit log”. This call was not generated by the sub-postmaster calling the help desk, but by the System Management Centre (**SMC**) which automatically triggers a call when there is an unusual event. The call was referred to the System Support Centre (**SSC**), so the SMC closed their call. 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.
20. **25 February 2004, 5.33pm, call reference e-0402251077** (pages 19 to 20) – Call was taken by Kuljinder Bhachu at HSH. The sub-postmaster reported that the branch was getting large discrepancies for the past few weeks. The closed calls were reviewed and it was noted that a number of calls had been logged regarding discrepancies and that the NBSC had been in contact with the sub-postmaster could not find any user error. Kuljinder spoke to Sandra at NBSC. They checked the Tivoli events log and the system appeared to be OK. (An “event” is any occurrence in the system or in an application which the operating system records to an event-log file called the Tivoli events-log. This event logging service starts automatically each time a computer running Windows NT is started). Given that a critical event had been noted earlier that day, the event logs were downloaded for review. The sub-postmaster advised that the problem had started ever since the BT engineer came to move the BT box for preparation for the installation of the ADSL. Kuljinder recommended that SSC investigate why the sub-postmaster is experiencing large discrepancies. A known error log (**KEL**) reference was given and the problem was re-assigned within HSH to group EDSC1 (European Development and Support Centre) which is the helpdesk group name for the SSC and call PC0099954 was logged to enable them to look at the call. At this point Anne Chambers of SSC investigated the matter. She found that there was no evidence ~~whatsoever~~ of any system problem.

21. **4 March 2004, 8.42am, call reference e-0403040165** (page 21) – A call was taken by Hayley Minnis, a HSH retail line manager. The caller reported discrepancies in the office and was advised to speak to NBSC about this, since it was not a HSH issue. The call was then closed.
22. **4 March 2004, 11.28am, call reference e-0403040524** (page 22) - A call was taken by Elspeth Neilson. The sub-postmaster's line manager stated that the sub-postmaster was getting large discrepancies. They were advised that the discrepancies are caused by the difference between the transactions they have recorded on the system and the cash they have declared and are not being caused by the software or hardware. The call was then closed.
23. **23 March 2004, 11.44pm, call reference e-0403230583** (page 23) – Call was taken by Jacqueline Wilcock at HSH. The auditor wanted to know when the base unit had been exchanged at the Marine Drive branch. They were advised that it was exchanged on 2 February 2004. The call was then closed.
24. **23 March 2004, 2.20pm, call reference e-0403230628** (page 24) – Call was taken by David Dawe at HSH. Brett from the NBSC asked for a One Shot Password (**OSP**) for the auditor. An OSP is issued so that the auditor can log on to the sub-postmaster's system. An OSP was given and the call was closed.
25. **1 April 2004, 12.45pm, call reference e-0404010718** (page 25) – A call was taken by Adam Goldstein at HSH. The new sub-postmaster stated that the screen had frozen. A check of the events log for this counter was carried out which showed there to be no faults and the sub-postmaster was advised to reboot. The call was then closed.
26. **19 April 2004, 9.57am, call reference e-0404190387** (page 26) – A call was taken by Elspeth Neilson at HSH. The Retail Line Manager (**RLM**) stated that there had been discrepancies on the system since the base unit was swapped in February and wanted to know why. The RLM was advised that events appeared to be normal and that a health check had been passed. The sub-postmaster was happy to continue unassisted. The RLM stated that the new sub-postmaster had



been in the office and there had not been any discrepancies in the balance. The RLM was advised to contact NBSC for advice on balancing. The call was closed.

27. **21 April 2004, 9.10am, call reference e-0404210187** (page 27) – A call was taken by David Dawe. The sub-postmaster stated that the gateway was saying to enter the PMMC and that the screen had been blue for 10 minutes. The sub-postmaster had to wait for the screen to clear. The sub-postmaster was told to wait for 20 minutes as that screen was normal and the sub-postmaster was told to call back if this had not changed within the next 20 minutes. The call was then closed.
28. **21 April 2004, 1.32pm, call reference e-0404210701** (pages 28 to 29) – A call was taken from Bernard Michael at SMC. This was an SMC call and related to a software upgrade. It was when ADSL (broadband), that had been installed in 20 January 2004, was actually switched on. The call was then closed once the switch over to ADSL had been successful.
29. **23 April 2004, 3pm, call reference e-0404230660** (page 30) – A call was taken by Jason Lockyear. The sub-postmaster wanted to know if he could get a list of his calls and of software. The sub-postmaster was advised to contact NBSC for a full list and the call was then closed.

I believe that the facts stated in this witness statement are true.

Signed .....

ANDREW PAUL DUNKS

Date .....

**Claim No. HQ05X02706**

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**BETWEEN:**

**POST OFFICE LIMITED**

**Claimant/Part 20  
Defendant**

**- and -**

**LEE CASTLETON**

**Defendant/Part 20  
Claimant**

**WITNESS STATEMENT OF ANDREW  
PAUL DUNKS**

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Filed on behalf of the:	Claimant
Witness:	A P Dunks
Statement:	1
Exhibits:	"AD1"
Date made:	4/10/06

**IN THE HIGH COURT OF JUSTICE  
QUEENS BENCH DIVISION**

**Claim No.**

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**Claimant/Part 20  
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**- and -**

**LEE CASTLETON**

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Claimant**

**EXHIBIT "APD1"**

This is the Exhibit marked "AD1" referred to in the Witness Statement of Andrew Paul Dunks dated September 2006.