

## Witness Statement

(CJ Act 1967, s9; MC Act 1980, ss 5A(3)(a)  
and 5B, MC Rules 1981, r 70)



**Statement of** Andrew Paul Dunks

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

This statement (consisting of 13 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 5th day of June 2008

Signature

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 have a working knowledge of the computer system known as Horizon, which is a computerised accounting system used by Post Office Ltd. 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.

I make this Witness Statement from facts within my own knowledge unless otherwise stated. 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.

An important element of the support provided to sub-postmasters and Counter Clerks is the

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## Witness Statement

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Continuation of statement of

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 **01/09/05** to **29/11/06** for the **Porters Ave** Post Office – Branch Code 0107026. A report outlining each call was created and I produce the resultant CD as Exhibit APD/01. This CD, Exhibit APD/01, was sent to the Post Office Investigation section by Special Delivery on 19<sup>th</sup> February 2007.

I have reviewed the HSH calls pertaining to the **Porters Ave** branch during the period **01/09/05** to **29/11/06** there were 33 calls from the branch to HSH and all the calls are of a routine nature and do not fall outside the normal working parameters of the system. And in my opinion would have had no affect on any counter discrepancies.

A breakdown of the reason for the calls is given below:

1. Past to NBSC (Network Business Support Centre) = 3
2. Power Cut = 1
3. PinPad = 1
4. Error Events Monitored = 2
5. PIN (Personal Identification Number) = 2
6. System Freeze = 3
7. Duplicate Call = 1
8. Keyboard (KB) = 1
9. Flood Damage = 1
11. Information Request = 1

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## Witness Statement

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Continuation of statement of

12. Loss of Network Connectivity = 5
13. Encryption Key Renewal = 3
14. Credit Card = 1
15. Bar Code Reader (BCR) = 1
16. One Shot Password (OSP) = 1
17. Office Closure = 1

Call reference details and an overview of each call are given in date order below:

### 1. **Thu 08 September 2005 13:40** Call Reference E- 0509080545

New call taken by Anthony Vasse: pm (post master) wants to check foreign currency rates.

#### **Resolution:**

Call Closed by Anthony Vasse - Thu 08 September 2005 13:41: referred pm to nbsc (Network Business Support Centre) for currency rate issue.

#### **Outcome**

PM enquiry past to the NBSC for resolution.

### 2. **Thu 10 November 2005 08:42** Call Reference E- 0511100151

New call taken by Denise Miller: BRANCH TRADING > FAILING TO ROLLOVER 09/11 @ 03:15

#### **Resolution:**

Call Closed by Denise Miller - Fri 05 May 2006 12:26: @@BIM - matter resolved last year.

#### **Outcome**

This call was logged at the same time as E-0511100152 about the same problem of failing to rollover, which was passed to the NBSC(Network Business Support Centre) for resolution.

### 3. **Thu 10 November 2005 08:42** Call Reference E- 0511100152

New call taken by Anthony Vasse: pm (post master) is not in the right ca (Cash Account) period and has not rolled over this morning.

#### **Resolution:**

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## Witness Statement

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Continuation of statement of

Call Close by Anthony Vasse - Thu 10 November 2005 08:44: referred pm to the nbsc for trading balance issue.

### **Outcome**

PM enquiry past to the NBSC for resolution.

#### **4. Sat 10 December 2005 09:53 Call Reference E- 0512100110**

New call taken by Erica Tidman: caller has a power failure, contacting horizon to inform helpdesk

### **Resolution:**

Call Close by Erica Tidman - Sat 10 December 2005 09:55: power failure, power failure recorded, ref given

### **Outcome**

The PM was logging this call to inform the helpdesk that the PO (Post Office) had just had a power cut.

#### **5. Wed 04 January 2006 16:34 Call Reference E- 0601040801**

New call taken by Simon Hopperton: pm states that the pinpad is not working as it keeps coming up with the error message that the customer has made an unsuccessful attempt.

### **Resolution:**

Call Close by Simon Hopperton - Wed 04 January 2006 16:41: pm states that the pinpad is not working as it keeps coming up with the error message that the customer has made an unsuccessful attempt. pm hung up. pm is happy to close call.

### **Outcome**

PM advised to check cables and also walked through reinstallation of the Pinpad.

#### **6. Wed 04 January 2006 17:26 Call Reference E- 0601040831**

New call taken by Ricky Law - Wed 04 January 2006 17:33: PM need walkthrough pinpad installation

### **Resolution:**

Call Closed by Ricky Law: PM needed pinpad install walkthrough . PM given instructions on how to do a pinpad installation. Said to call back if any problems occur.

### **Outcome**

PM given help on how to re-install a pinpad to see if it fixes the fault.

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Continuation of statement of

### **7. Wed 04 January 2006 17:35 Call Reference E- 0601040835**

New call taken by Nicola Whitehead: pm states that she is having problems after speaking to Ricki Law regarding the pinpad

#### **Resolution:**

Call Close by Sam Roullier - Thu 05 January 2006 15:09: \*\* [No Remark entered.] Call closure code of FAILURE and repair code 827

#### **Outcome**

An engineer was dispatched to replace faulty pinpad as previous attempts to fix fault did not work.

### **8. Thu 05 January 2006 02:23 Call Reference E- 0601050008**

New call taken by David Hunter: Critical Event received @ 01:15:43; 'An unexpected error occurred while attempting to insert a message. Timeout occurred waiting for lock (0xC1090003

**Resolution:** Call Close by David Hunter - Thu 05 January 2006 03:57: closing call

#### **Outcome**

An automatic error event was picked up by the SMC (System Management Centre) [2nd line support] and a call was logged. The SMC referred to KEL (*Known Error Log*) database ref: JSimpkins338Q. The KEL recommends a remote counter reboot which fixed the problem and no further events were seen.

### **9. Fri 13 January 2006 15:58 Call Reference E- 0601130555**

New call taken by Keely Fitzgerald: pm states that her pinpad won't accept cards.

#### **Resolution:**

Call Close by Akram Ali - Mon 16 January 2006 15:31: \*\* [No Remark entered.] Call closure code of FAILURE and repair code 821

#### **Outcome**

After pm checked the pinpad an engineer was dispatched to replace it.

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## Witness Statement

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Continuation of statement of

### 10. **Wed 18 January 2006 09:15** Call Reference E- 0601180136

New call taken by Darryl Johnson: PM states that he has had to reboot and got new PIN (Personal Identification Number) printed but PIN is not going through on the system.

#### **Resolution:**

Call Closed by Darryl Johnson - Wed 18 January 2006 09:20: PM states that PIN (Personal Identification Number) is not going through on the system - reboot -ref offered

#### **Outcome**

A new PIN was allocated to the PM.

### 11. **Wed 18 January 2006 17:45** Call Reference E- 0601180817

New call taken by Hamid Abdul: pm states screen froze during transaction

#### **Resolution:**

Call Close by Hamid Abdul - Wed 18 January 2006 17:47 m states screen froze during transaction. reboot required.

#### **Outcome**

PM contacted the helpdesk as the screen had frozen on counter 2. The pm was advised to re-boot the counter which then continued to operate as normal.

### 12. **Mon 23 January 2006 08:58** Call Reference E- 0601230120

New call taken by Sam Roullier: PM states that they cleaned the other day and they have disconnected cable now he has gone to enter his PMMC card (Postmaster Memory Card) but doesn't know where his pin is.

#### **Resolution:**

Call Close by Katrina Brooks - Mon 23 January 2006 13:49: have been able to contact site and speak to pm, pm reports that he has found his pin and has been able to complete the reboot of counter

#### **Outcome**

The pm contacted the helpdesk to say that they had lost their PIN which is input when using the PMMC card, which is used by sub-postmasters to log onto their terminal. PM stated that they had found their PIN and logged in ok.

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## Witness Statement

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Continuation of statement of

### 13. **Mon 23 January 2006 13:10** Call Reference E- 0601230734

New call taken by Stephen Ashby: pm states bcr (Bar Code Reader) is not working

#### **Resolution:**

Call Close by Joseph Mould - Mon 23 January 2006 15:06: engineer adjusted cable tested ok Call closure code of and repair code 824

#### **Outcome**

Engineer went to site and adjusted BCR cable on counter 2 and tested OK.

### 14. **Mon 23 January 2006 13:15** Call Reference E- 0601230737

New call taken by Stephen Ashby: pm states bcr not working

#### **Resolution:**

Call Close by Stephen Ashby - Mon 23 January 2006 13:17: pm states bcr not working. reboot required. ref no offered.

#### **Outcome**

This appears to be a duplicate call for the BCR on counter 2 which was resolved as per previous call E- 0601230734.

### 15. **Thu 16 February 2006 15:30** Call Reference E- 0602160746

New call taken by Louise Peplow: Pm states that the KB (Keyboard) is not accepting swipe cards.

#### **Resolution:**

Call Close by Catherine Jeanes - Fri 17 February 2006 16:23: \*\* [No Remark entered.]  
Call closure code of FAILURE and repair code 821

#### **Outcome**

An engineer was dispatched and the KB (Keyboard) was replaced and tested.

### 16. **Mon 13 March 2006 16:25** Call Reference E- 0603131056

New call taken by James Butterworth: Pm states that the pinpad is not working.

#### **Resolution:**

Call Close by Stephen Ashby - Tue 14 March 2006 16:01: engineer swapped pinpad. tested ok. Call closure code of and repair code 821

#### **Outcome**

An engineer was dispatched and the KB was replaced and tested.

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Continuation of statement of

### 17. **Fri 05 May 2006 08:45** Call Reference E- 0605050099

New call taken by Jennifer Dear: Cath from NBSC states that site will be closed until further notice due to flooding and site needing to be re-wired

#### **Resolution:**

Call Close by Denise Miller - Wed 10 May 2006 15:20: @@BIM as per progress branch reopened.

#### **Outcome**

The NBSC logged this call to highlight that this PO was closed due to flood damage, it was re-opened 3 days later on the 8<sup>th</sup> May.

### 18. **Fri 05 May 2006 12:50** Call Reference E- 0605050676

New call taken by Denise Miller: Branch has closed today owing to flood /no power. Can SSC (System Support Centre) advise date last branch trading harvested etc., branch may require rewire so need latest date PO should reopen by to avoid archiving. thanks.

#### **Resolution:**

Call Close by Denise Miller - Wed 10 May 2006 15:21: @@BIM - above comments duly noted. Branch reopened successfully.,

#### **Outcome**

This call was logged to find out how long the PO could be closed before it affected its data retrieval. The PO was re-opened 3 days latter so no action necessary.

### 19. **Tue 09 May 2006 14:28** Call Reference E- 0605090919

New call taken by Sukhdeep Thind: Pm reports that she has online services unavailable - 0111.

#### **Resolution:**

Call Close by Sukhdeep Thind - Tue 09 May 2006 14:30: online services unavailable. NFF (no fault found).

#### **Outcome**

It appears that the PO may have briefly lost network connectivity, the helpdesk could not find any fault and the call was closed.

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Continuation of statement of

### **20. Fri 12 May 2006 23:31 Call Reference E- 0605120970**

New call taken by Richard Postance: Critical NT\_Error occurred at 23:17:25, 12/05/06 on H10702600101. KMRX: Riposte Error 1726. The remote procedure call failed. (0x6BE) RiposteReadMessagePort.

#### **Resolution:**

Call Close by Richard Postance - Sat 13 May 2006 07:15: Counter successfully rebooted, no further errors. closing call.

#### **Outcome**

*("NT" referring to the Microsoft operating software used on the counters)*

An automatic error event was picked up by the SMC (System Management Centre) [2nd line support] and a call was logged. The SMC referred to KEL (*Known Error Log*) database ref: MWright1245K. The KEL recommends a remote counter reboot which fixed the problem and no further events were seen. This error was due to the KMRX service (which is the Key Management Distribution Receiver Service that runs on counters) failing to respond.

### **21. Fri 19 May 2006 12:43 Call Reference E- 0605190435**

New call taken by Anthony Vasse: pm needs to update the security on the system.

#### **Resolution:**

Call Close by Anthony Vasse - Fri 19 May 2006 12:45: pm needed help with a kma (Key Management Application) refresh. Issue resolved.

#### **Outcome**

The data encryption keys on all counters are renewed/refreshed every 2 years via rebooting the counters and by following some on screen instructions. The PM needed assistance in doing this.

### **22. Sat 20 May 2006 09:20 Call Reference E- 0605200118**

New call taken by Darryl Johnson: PM states that he is trying to update PMMC (Postmaster Memory Card) but now has communication with the centre has failed.

#### **Resolution:**

Call Close by Darryl Johnson - Sat 20 May 2006 09:25: pm states that he has communication with the centre failed- kma door opened - re offered

#### **Outcome**

The network communication failed when trying to update the data encryption keys on the PMMC, as the comms have to be set/open ("door") for specific updates, this was then set by the helpdesk and the update re-tried successfully.

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Continuation of statement of

### 23. **Thu 25 May 2006 16:04** Call Reference E- 0605250980

New call taken by Matthew Fry: FAD requires Security keys updated - Contact the PM to request controlled restarts and acceptance of new security data on all slave counters.

#### **Resolution:**

Call Close by Lee Shambrook - Mon 19 June 2006 15:46: KMA complete

#### **Outcome**

The helpdesk contacted the pm to advise him to re-boot counter 2 so that the encryption key update can complete.

### 24. **Fri 01 September 2006 10:19** Call Reference E- 0609010268

New call taken by Elspeth Neilson: PM (post master) states all London Borough and Dagenham swipe cards are being declined on both counters. All other swipe cards are being accepted.

#### **Resolution:**

Call Close by Elspeth Neilson - 01/09/2006 10:22: PM reported London Borough cards not going through. Advised that the problem is with the cards. Referred to NBSC (Network Business Support Centre).

#### **Outcome**

This was a problem with a customer credit card and passed to the NBSC.

### 25. **Mon 04 September 2006 10:01** Call Reference E- 609040287

New call taken by Stephen Ashby: pm states online services unavailable.

#### **Resolution:**

Call Close by Stephen Ashby - 04/09/2006 10:05: online services unavailable, The network connection was successfully pinged (tested) and now fine.

#### **Outcome**

Network communication was lost briefly.

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Continuation of statement of

26. **Mon 04 September 2006 14:52** Call Reference E-0609040840

New call taken by Akram Ali: pm states that he has message on screen telling him to contact Horizon and quote error code 00000111.

**Resolution:**

Call Close by Akram Ali - 04/09/2006 14:56: pm advised to carry out a network test, advised test was fine pm will call back if still not working.

**Outcome**

The error code quoted was informing that there had been a brief loss in network communication.

27. **Tue 05 September 2006 15:14** Call Reference E- 0609050731

New call taken by Stephen Ashby: pm states online services unavailable.

**Resolution:**

Call Close by Stephen Ashby - 05/09/2006 15:16: online services unavailable, The network connection was successfully pinged (tested) and now fine.

**Outcome**

Network communication was lost briefly

28. **Tue 05 September 2006 15:35** Call Reference E- 0609050766

New call taken by Elspeth Neilson: PM states online services are unavailable. Online services have been intermittent since yesterday morning.

**Resolution:**

Call Close by Jordan Edgar - 12/09/2006 10:03: Pm was advised to perform a counter re-boot and it was also arranged for BT to check the phone lines for any problems (no fault was found). It was then decided to replace the Base Unit (counter) to see if this cured the intermittent fault. The base unit was swapped and the site was monitored for any recurrence of the problem. The PM was contacted and was happy for call to be closed.

**Outcome**

This was a problem with network communication with the counter, An engineer was dispatched and the counter was swapped out.

29. **Wed 13 September 2006 14:36** Call Reference E-0609130558

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## Witness Statement

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Continuation of statement of

New call taken by Ricki Law: Please wait while receipt is printed message has frozen on screen.

### **Resolution:**

Call Close by Ricki Law - 13/09/2006 14:39: Please wait while receipt is printed message has frozen on screen. PM advised to carry out a reboot of the counter.

### **Outcome**

This was a counter freeze which was resolved with a reboot.

### 30. **Thu 21 September 2006 17:12** Call Reference E- 0609210861

New call taken by Ricki Law: PM states system has frozen on riposte screen,

### **Resolution:**

Call Close by Ricki Law - 21/09/2006 17:16: PM states system has frozen on riposte screen.(screen had frozen during reboot) advised reboot.

### **Outcome**

This was a counter freeze which was resolved with a reboot.

### 31. **Wed 29 November 2006 14:25** Call Reference E- 0611290626

New call taken by Joanne Rowland: nbcs requests osp (One Shot Password) for auditor.

### **Resolution:**

Advised Call Close by Joanne Rowland - 29/11/2006 14:34: osp provided for auditor.

### **Outcome**

A OSP was required by the auditor to enable him to log in to the counter, this was authorised by the NBSC.

### 32. **Wed 29 November 2006 15:39** Call Reference E- 0611290757

New call taken by Daley Bilton: requests OSP contact on GRO

### **Resolution:**

Call Close by Daley Bilton 29/11/2006 16:05: osp given

### **Outcome**

A OSP was required by the auditor to enable him to log in to the counter, this was authorised by the NBSC.

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## Witness Statement

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Continuation of statement of

### 33. **Wed 29 November 2006 16:26** Call Reference E- 0611290794

New call taken by Stephanie Byrne: Closure @ 1600 today due to an Audit. Closed until further notice

#### **Resolution:**

This call is still open.

#### **Outcome**

This call was raised to highlight the fact that the Office will be closed until further notice.

The calls **E- 0605120970**, **E- 0601050008**, refer to a "critical event" "Critical NT\_Error". 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 systems, which would also highlight any further issues, was undertaken and repaired the problem and confirmed stability of the system. 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.

Signature

Signature witnessed by