

## Stephen Dilley

**From:** Bob Heckford  
**Sent:** 28 November 2005 09:43  
**To:** Stephen Dilley; Tom Beezer  
**Cc:** Julian Summerhayes  
**Subject:** RE: Castleton - Disclosure

Is this request for 'similar fact evidence' something that is allowed in civil matters?

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**From:** Stephen Dilley  
**Sent:** 24 November 2005 17:47  
**To:** Tom Beezer  
**Cc:** Bob Heckford; Julian Summerhayes  
**Subject:** Castleton - Disclosure

Dear Tom,

You will recall that one of the questions Mr Castleton's solicitors have raised is that we should give them wider disclosure of all Horizon related problems at the P.O, details of the claims made involving shortfalls and the Horizon system and the outcome of those claims. This is because they state that there are endemic problems with Horizon.

This seems like an onerous request. At Mandy's suggestion I have spoken with David Hulbert of the P.O GRO to ascertain how easy it would be to get this sort of info. He confirmed that there are 2 Horizon helplines:

1. Horizon Service Helpline (I.e Fujitsu services) which receives 12,000 to 15,000 calls per month. This is for technical problems with Horizon.
2. Network Business Support Centre (part of the P.O) which receives 20,000 calls per week. This is for matters such as accounts discrepancies.

Call are not logged by category, so someone would manually have to go through the records of every single call logged to tell whether it concerned a Horizon based problem. Dave Hulbert estimated a junior manager would have to do this and it would take them 3 to 4 weeks to go through 3 to 4 months worth of call logs and this would cost the P.O approximately £2,000 to £3,000. Obviously the time and cost are increased if more than 3 to 4 months worth of information is needed.

This is useful information and something I think you could share with Mandy tomorrow. I would prefer not to share this with Mr Castleton's solicitors now because there are more relevant issues that I want the parties to focus on. However, if Mr Castleton's solicitors press for the disclosure of this broad category of information, the above figures may help us to show that it would be unreasonable to produce search for it and therefore it need not be disclosed.

Kind regards,

Stephen Dilley  
Solicitor  
for and on behalf of Bond Pearce LLP

**GRO**

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