

Witness Statement

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

Statement of **William Leslie Mitchell**

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

This statement (consisting of --9-- 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 15th day of April 2005

Signature

I have been employed by Fujitsu Services, Post Office Account, formally ICL Pathway Ltd., since the 22nd September 2003 as Security Manager where I am responsible for audit data extractions and IT Security. I have 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 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 that monitor faults, polling failures, equipment failures and calls for advice and guidance logged by the Horizon System Helpdesk recorded during the period from the 1st April 2002 to the 30th April 2003 for the **Shobnall Road Post Office – FAD Code 395207**.

I have reviewed the helpdesk calls pertaining to this office and during the period 1st April 2002 to the 30th April 2003 there were 32 calls from Shobnall Road Post Office – FAD Code 395207 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. A breakdown of the calls is given below:

1. Postmaster requesting help and advice on using Horizon System functions = 3.
2. Flood = 3.
3. No Electrical Power = 2
3. Hardware problems = 6
4. Log On failure = 2.

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

5. Non Polling Issues = 3
6. User Error = 5
7. OBC requests = 6.
8. OSP Requests = 1
9. Wrong Number = 1

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

1st July 2002, 1554hrs, Call Reference E-0207011009 – Postmaster (PM) they have had a power cut and it has been off for some time, PM hung up before being transferred.

Resolution: Call Abandoned - Call Closed.

3rd July 2002, 1200hrs, Call Reference E-0207030539 – Claire @ National Business Support Centre (NBSC) reports that the PM is having electrical work done. **Resolution:** PM contacted and advised that it will be Ok to power down the kit – Call Closed.

4th July 2002, 1017hrs, Call Reference E-0207040605 – Sue @ NBSC, PM advised that she has not balanced yet, she has done the stock revaluation and the adjusted stock figures are not correct. PM has not been able to rollover due to the end of day marker being sent down and revaluation not been done correctly. PM has revalued incorrectly several times. **Resolution:** PM had not been able to rollover due to end of day marker being sent down and repeated revaluations had not being done correctly. Reversed all incorrect revaluations, this is now correct and PM has rolled over. Call information modified from EPOSS to 'EPOSS-Cash Account Problem - Call Closed.

18th July 2002, 1707hrs, Call Reference E-0207181192 – Tracey @ NBSC transferred call H11714170 PM reports that she has no access to logout and administration functions and wants to know what to do. **Resolution:** Advised the PM the system was in 'suspense' mode and the correct process to resolve the problem. PM reports that she has now logged out successfully after printing the balance snapshot – Call Closed.

10th September 2002, 1400hrs, Call Reference E-0209100810 – Trish @ NBSC is calling to say that this office will be closed today due to flood damage. **Resolution:** Call reassigned as

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

Administration, Management Support Unit (MSU) is aware – Call Closed.

11th September 2002, 1536hrs, Call Reference E-0209111168 – Trish @ NBSC This office is going to be closed until tomorrow due to flood damage. **Resolution:** Call reassigned as Administration, MSU is aware – Call Closed.

12th September 2002, 0930hrs, Call Reference E-0209120238 – Debbie @ NBSC H20766441 Office re-opened this morning. **Resolution:** MSU is aware – Call Closed.

4th December 2002, 1127hrs, Call Reference E-0212040322 – Adele @ NBSC Office closed from 1 pm today, re-open tomorrow due to balance problems. **Resolution:** MSU made aware - Call Closed.

4th December 2002, 1843hrs, Call Reference E-0212040890 – Lesley @ NBSC Office re-opening tomorrow at 9 am. **Resolution:** MSU made aware - Call Closed.

6th December 2002, 1216hrs, Call Reference E-0212060410 – Debbie @ NBSC. PM reports that her keyboard and touch screen will not respond. PM reports that she says it freezes then unfreezes all on its own, and it is doing this quite regularly. **Resolution:** Engineer dispatched to site, arrived at 13:14 on 06-12-2002 and replaced touch screen due to phantom transaction /calibration problems – Call Closed.

10th December 2002, 1149hrs, Call Reference E-0212100346 – PM states that the monitor is still faulty. The power switch does not work and the PM is experiencing phantom transactions, she has cleaned the screen and checked all the cables and they all look secure. PM will allow access at the following times; today until 1800 hours and tomorrow between 0800-1800 hours – **Resolution:** Engineer dispatched to site arrived at 14:03 hours on 10-12-2002 replaced touch screen due to faulty on/off switch and tested Ok. – Call Closed.

12th December 2002, 1516hrs, Call Reference E-0212120663 - PM had a new touch screen and data cable on Friday and again on Tuesday, both engineers say this is not a monitor problem, it is doing phantom transactions and not registering real transactions. PM has one shared stock unit and one user and states she had a witness when she was counting the 1st class stamps and that the total was different from the system balance. The PM also said the 'manager' was with her when they were trying to do special deliveries, home shopping and

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

parcel traffic, she entered the nominated amount and the system said there were no transactions. Monitor and cables have been swapped but figures are still changing.

Resolution: Engineer dispatched and arrived on site at 16:48 hours on 16-12-2002, replaced base unit and keyboard, however, an ISDN problem was also identified and notified to Horizon System Helpdesk (HSH) – Call Closed.

13th December 2002, 1224hrs, Call Reference E-0212130390 – Clair Dowsett @ Service Management Centre (SMC) – This FAD is non-polling, a problem with the ISDN line was outlined in call E-0212120663, with engineer attempting a base unit swap which failed at 3% of system download – **Resolution:** ISDN connectivity was restored, site is communicating and an end of day marker has been received - Call Closed.

16th December 2002, 1257hrs, Call Reference E-0212160616 - PM called as she is waiting for a British Telecom (BT) engineer to call to fix the ISDN line and wants to know when he will be there – **Resolution:** Call reassigned to HSH5, but was unable to contact the PM - Call Closed.

3rd January 2003, 1531hrs, Call Reference E-0301030710 – PM has problems with the touch screen and colour. **Resolution:** Talked caller through factory reset and adjusting screen in engineer screen. Display is Ok, but screen failed again even though calibration was Ok, Advised caller to reboot and call back if the problem was the same – Call Closed.

3rd January 2003, 1600hrs, Call Reference E-0301030748 – PM had problem with touch screen earlier she was advised a reboot which has not resolved the problem. **Resolution:** Advised PM to recalibrate screen again the cross did not move when she tried this, earlier call ref E-0301030710. Call was to be passed across for an engineer to call as the recalibration failed, however, on contacting PM she reports that the touch facility is now functioning as it should – PM had rebooted and now the monitor is responding to touch – Call Closed.

6th January 2003, 1236hrs, Call Reference E-0301060557 - PM having problem with system: has been failing to register transactions; freezing when scanning and when unfreezes there are sometimes phantom transactions in stack, pm upset at having to reboot so often, presently frozen on print screen. **Resolution:** System shows symptoms of freezing. Don Banham, the Field Service Manager (FSM) is going out to the site next week. Call suspended pending FSM

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

visit on 13th Jan 2003 – Following FSM visit the call was closed on Tue 14 January 2003 and new call raised as potential environmental issue, so that we can monitor and investigate without SLA – Call Closed.

8th January 2003, 1340hrs, Call Reference E-0301080539 - This site has been experiencing screen freezes. PM not happy because she has already had 3 monitor swaps, 1 base unit swap and 1 keyboard swap. **Resolution:** Voiced Don Banham FSM to inform him of the situation. He is due to visit the site on 13th January 2003 – Call Closed.

14th January 2003, 1728hrs, Call Reference E-0301140688 - PM has been having numerous issues, call originally logged as software but no software issue has been found. PM would like further investigation into these problems. **Resolution:** Call forwarded to Senior Technician within Horizon Incident Team (HIT) for further investigation. The Service Control Team (SCT) is to monitor the site for 4 weeks. However, on the 27th Jan 2003 the HIT informed the SCT that they can not find anything that may lead to software problems by checking the daily events. The PM has not called the helpdesk with any abnormal transactions during this period. Advised that the call should be closed as there had been no further calls from the PM – Call Closed.

15th January 2003, 1552hrs, Call Reference E-0301150781 - FSM would like an engineer to go the site to swap the monitor and change the cables. FSM would also like the engineer to install Shielded Lan and Chromeric Collars. **Resolution:** Call escalated to Bill Burrows for further investigation. Engineer advised not to attend pending more information. The call was also escalated to Karen Harrod, SCT Manager to escalate to Dave Law for progression – Call Closed.

16th January 2003, 1138hrs, Call Reference E-0301160426 – Please see call ref no E-0301140688 for further information. Please check the message stores for any anomalies as requested by Don Banham. The PM is having issues balancing cheques and the system is asking the PM to declare cash when initially logging onto the system at the start of business. The message is 'Declaration outstanding, the overnight cash holding declaration for this stock unit was not entered. Please enter it now'. The PM is carrying out the correct procedure for EOD reports as observed on Weds 15/1/03, however, at the time of FSM visit at 0900 on

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

20/01/03 the PM had a message asking her to declare cash on screen. Apart from this no other issues were observed during the 2.5 hours the system was monitored by the FSM.

Resolution: SSC have not been able to find any indication of problems that might be caused by software errors, however, the PM does not seem to be following the correct procedures for balancing and ONCH declaration. Claims of transactions entered and then 'lost' from system are not borne out by examination of message store and log files. PM advised, but is not happy with the response.

Nick Crow has spoken to the PM who is still progressing the electrical issues, e.g. the removal of a baby monitor, fax phone and other non-approved equipment from the counter, things are now stable. The SCT were requested to monitor the site until Nick Crow has been to the site. Fri 07 March 2003 09:55 contacted Nick Crow. Nick has been to the site, there are no further issues with the site. Nick has agreed to call closure – Call Closed.

17th January 2003, 1047hrs, Call Reference E-0301170233 – Sheila @ NBSC transferred the call H20884663, the PM wants to page their FSM Don Banham. **Resolution:** Advised the PM that we will speak to service control, spoke to Reshma who advised that this request has been escalated and the message has gone through – Advised the PM that the call has been escalated and the msg has gone out for Don Banham – Call Closed.

17th January 2003, 1415hrs, Call Reference E-0301170456 – Don Banham: Please can you investigate an issue concerning the PM's assistant being unable to log onto the system, as discussed between Don Banham and Mik Peach. Agreed by Mik Peach and for Mik Peach's attention. **Resolution:** Advice and guidance given, there are no failed logons on Saturday 18th Jan, user DWH001 started to log on, but didn't complete the process and users ABILL01 and 0000 attempted to log on the 15th Jan, but neither of these are valid usernames. Regarding the issue with the PM's father, no information was provided, but it is assume that this is PWH001, this user was moved from the MANAGERS Group to the SUPERVISORS group 1st Oct 2002. The user hasn't been deleted. Voiced Don Banham who has spoken to the PM who is unhappy with the response. Refer to call E-0301160426 for update of the investigation - Call Closed.

24th January 2003, 1458hrs, Call Reference E-0301240569 - BI3_ONC 16_10 Failed to

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

Distribute to this Node with an "Unable to Ping" error. **Resolution:** Health checks now successful and awaiting result of the re-distribute to this Node – 30th January 2003 12:42 product now successfully distributed – Call Closed.

19th February 2003, 0838hrs, Call Reference E-0302190055 – PM rang wrong number – PM realized she'd rang the wrong number and hung up. **Resolution:** Call Closed.

19th February 2003, 1256hrs, Call Reference E-0302190624 – Teresa @ NBSC called to advised that the office closed at 1030 hrs and will re-open tomorrow H12169624. **Resolution:** Office re-opened on 22nd February 2003 at 1148hrs, reference E-030220499, Last EOD received 1830hrs on 21st Feb 2003 – Call Closed.

20th February 2003, 1207hrs, Call Reference E-0302200499 – Amanda @ NBSC Post Office is re-opening at 0900hrs today. **Resolution:** Office has re-opened reference E-0302190624, Last EOD received on 21st Feb 2003 at 1830hrs – Call Closed.

24th March, 1622hrs, Call Reference E-0303240797 – Adele @ NBSC office closed @ 1620 24th Mar 2003, re-opens as normal tomorrow morning. **Resolution:** OBC call raised for re-open, closing call EOD received and site communicating – Call Closed.

25th March 2003, 1129hrs, Call Reference E-0303250333 – Kat @ NBSC, Post Office re-opening, re-opened as of 9am this morning. **Resolution:** OBC call raised for re-opening, EOD received and site communicating – Call Closed.

8th April 2003, 1250hrs, Call Reference E-0304080470 – Ann @ NBSC, office closed at 1230hrs today. **Resolution:** OBC, site re-opened as per NBSC and E-0304140559 – Call Closed.

14th April 2003, 1331hrs, Call Reference E-0304140559 – Malcolm @ NBSC, office re-opened on Saturday 12th. **Resolution:** OBC – site re-opened as per NBSC – Call Closed

16th April 2003, 1408hrs, Call Reference E-0304160505 – Liz @ NBSC, Requires OSP for auditor (Paul Humber) all access – Auditor needed One Shot Password (OSP) to gain access to system. **Resolution:** OSP was generated and given to auditor – Call Closed.

I have been asked in my capacity of Security Manager on the Post Office Account, to review and comment regarding the root cause of a number of helpdesk calls logged by the Shobnall

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

Road Post Office, FAD Code 395207 and the possibility that phantom transactions had taken place.

The term phantom transactions has been used in this instance to describe an occurrence where there is physical interference with input devices such as screens and keyboards; these have been reported and diagnosed with root causes such as, cats or dogs jumping up and putting paws on keyboards, people leaning over their keyboards and inadvertently pressing keys, cables being drawn across keyboards, keys becoming stuck down & other items being left on keyboards and in instances where system freezes have occurred the repeated pressing of touch screen icon or keys on the keyboard which may be stored in the memory buffer and when the system unfreezes entered into the system. There have been incidents where electromagnetic interference has caused malfunction of computer touch-screens but this has not produced substantive evidence that phantom transactions have been a consequence of such interference.

Where alleged phantom transactions resulting from interference to input devices as described above have occurred, they have generally resulted in multiple sales of one item and were consistent with one key being held down, or the touch screen icons being pressed more than once; in these cases the items were always sale items such as mobile phone cards or stamps, etc. However, this would always be reflected in the weekly cash account as an imbalance of either stock or cash. There is no evidence available to me to suggest this was the case with Shobnall Road.

Where phantom transactions were reported on a regular basis Fujitsu/ICL field personnel would recommend procedural measures to identify and contain the source of the transactions; these measures would include the following:

- 1) Advising the Post Master that a manual balance of the office should take place every day. This would act as a check when compared with the system derived report.
- 2) Where there were multiple counters and serving staff, advise the Post Master to adopt individual Stock units, this is a method of compartmentalising losses arising from unexplained transactions by ensuring that individual staff are tied to one accounting entity, the stock unit.
- 3) Where there was a suspicion that there may be electromagnetic interference suspect items

Signature

Signature witnessed by

Witness Statement

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

Continuation of statement of William Leslie Mitchell

such as florescent tubes and alarm system components were replaced; chromeric collars, small collars made from metal, that can commonly be found on many items of electrical wiring such as computer monitor leads, were attached to the Horizon equipment.

This type of action was recommended at Shobnall Road, but according to record the replacement of florescent tubes, replacement of alarm system components and installation of chromeric collars was never implemented. In other cases when the above measures were exercised all instances of interference were resolved. However, in the majority of cases 'user error' was eventually attributed to be the cause, in some cases a staff member left and the phantom transactions stopped and in some other cases the PM did not pursue the complaint.

There are no recorded cases where losses could be attributed to either physical or electromagnetic interference to the Horizon equipment and I am of the opinion that the incidents reported as phantom transactions were at best 'user errors'.

At various times between the 18th and the 23rd March 2005 hardcopy printouts of the 32 calls detailing the information recorded on the helpdesk database for the required date period were produced. I now produce the hardcopy printouts as Exhibit WLM/14.

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