Claim No: HQ16X01238, HQ17X02637 AND HQ17X04248

THE POST OFFICE GROUP LITIGATION

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

ROYAL COURTS OF JUSTICE

B E T W E E N:

ALAN BATES & OTHERS

<u>Claimant</u>

AND

POST OFFICE LIMITED

<u>Defendant</u>

POST OFFICE'S RESPONSE TO JASON COYNE'S "REQUESTS FOR INFORMATION" DOCUMENT SENT ON 12 JULY 2018 and DATED 26 JUNE 2018

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
1.1	Please describe how a Sub-Postmaster (" SPM") reports an issue (detailed from the moment that SPM picks up the phone), how this is recorded and how this is investigated (throughout the various 1st, 2nd and 3rd lines of support).	Post Office understands the word "issue" to mean a bug in Horizon. If this request intends the word "issue" to have a wider meaning then the scope of this request goes beyond the Horizon Issues and is not agreed. The means by which a SPM may report an issue	I do not believe this request is out of scope since Issue 1 concerns how bugs, ERRORS or defects have the potential to cause apparent or alleged shortfalls relating to Subpostmasters' branch accounts or transactions. For Post Office to	Post Office objects to the request to the extent that it requires Post Office to provide information about how SPMs report issues. Post Office accepts that Issue 1 concerns "bugs, errors or defects" that have the potential to cause apparent or alleged shortfalls relating to Subpostmasters' branch accounts or transactions. Fujitsu has supplied the following document references in relation to request 1.1, 1.1(a) and

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		to Post Office will be known to the Claimants and so Mr Coyne can obtain this information from his own clients. The processes for how Post Office and Fujitsu record issues and how they are investigated through the various lines of support should be located in documents and Post Office will ask Fujitsu to provide document references.	stipulate that ' issue' refers to bug alone is unreasonable as an SPM would not know if an error they encountered was in fact a bug.	1.1(b). To the extent that the Claimants are seeking more information beyond that provided in the documents below, then Post Office objects to the request on the basis that (i) the scope of the request is not understood and / or (ii) the requested information is not necessary. SVM/SDM/PRO/0875 END TO END APPLICATION SUPPORT STRATEGY POL-0122492 SVM/SDM/SD/0004 Horizon Online 3rd Line Application Support Service: Service Description POL-0129558 SVM/SDM/SD/0005 Application Support Service (4th line): Service Description POL-0148637 SVM/SDM/SD/0007 Service Management Service: Service Description POL-0148662 SVM/SDM/PRO/0018 Incident Management Procedure SVM/SDM/OLA/0017 Operational Level Agreement HNGx 4th line support POL-0128502, POL-0110230
	a. If a Peak/bug is determined, how is the impact considered and what is the process or scheduling into the development cycle and then ultimately the code versioning system? b. When and how are changes agreed through to release management, including the release notes for new versions and which persons these are shared amongst?	1.1(a) and 1.1(b) should be limited to bugs that could potentially create discrepancies in branch accounts. Subject to that point, the answers to 1.1(a) and 1.1(b) requests should be located in documents		

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				SVM/SDM/PRO/0025
				POST OFFICE ACCOUNT CUSTOMER SERVICE PROBLEM MANAGEMENT PROCEDURE
				POL-0146787, POL-0152874
				PA/PRO/001
				CHANGE MANAGEMENT PROCESS
				POL-0073950, POL-0122492
				SVM/SDM/PRO/1184
				MSC MANAGED SERVICE CHANGE PROCEDURE FOR POST OFFICE ACCOUNT
				POL-0136725
				SVM/SDM/OLA/3308
				FUJITSU - ATOS HORIZON SERVICE OPERATIONAL WORKING AGREEMENT
				POL-0148882
				CS/OLA/045
				OPERATIONAL LEVEL CHANGE AND RELEASE MANAGEMENT INTERFACE AGREEMENT BETWEEN POST OFFICE LTD AND FUJITSU SERVICES
				POL-0069985, POL-0070483
				SVM/SDM/PRO/1520
				RELEASE MANAGEMENT STRATEGY
				POL-0138750
				CS/MAN/011 PEAK USER GUIDE
				POL-0032934

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				DE/PRO/015 INCIDENT / DEFECT MANAGEMENT PROCESS POL-0075416 SVM/SDM/SD/0023 POA Call Enquiry Matrix and Incident Prioritisation POL-0148327 SVM/SDM/PRO/0019 BRANCH ISSUE MANAGEMENT PROCESS POL-0143705 CS/IFS/008 Fujitsu Services / Post Office Limited Interface Agreement for the Problem Management Interface POL-0146857
	c. Is there a consolidated complete release/version chronology available for Horizon/Horizon Online with accompanying Release Notes at final version?		Part 1.1c new request.	Fujitsu has provided a list of Release Notes. Although the list does not contain the accompanying Release Notes (of which there are 19,842) at final version, if there are any in particular that you would like to see Post Office will request these from Fujitsu.
1.2	Please describe how bugs/errors/defects identified by Fujitsu Services (" FJ the) Post Office (" PO "processed if it is the case that this is a different mechanism to those identified through an SPM issue.	Post Office's position is that the process is broadly the same regardless of whether an issue is identified by FJ, PO or an SPM. No further documents or information are required to comply with	" Broadly same" is not ' exactly same' , therefore the request stands. I do not believe the processes employed would be the same. For example, it is not envisaged that a Post	Post Office has provided document references supplied by Fujitsu in response to request 1.1 which detail how bugs/errors/defects identified by FJ or PO are processed. Fujitsu logs bugs/errors/defects that they identify in the Fujitsu TSD incident management system. When Atos log a call that is for Fujitsu (i.e. where a

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		this request by beyond that provided in response to request 1.1.	Office back office employee who might note an error would telephone the same helpline as an SPM would.	SPM or PO has identified an issue) it is automatically transferred across to the TSD. Once a call is logged into TSD the process for resolution is the same.
	a. What are " KELs" offline	?	Part 1.2a new request.	All of the KELs that have been provided by Fujitsu and disclosed to the Claimants are headed "SSC Offline KELs" in order to avoid any possible confusion with live KELs. The disclosed copies reflect a snapshot in time of the KEL database which is a live and changing environment. This is also the reason why every KEL has the same date in the right hand heading, being the date the copy was taken.
1.3	In relation to POL-0032853, is there further documentation that might detail any specific branches that were affected?	This is a factual question that would require Post Office to carry out a satellite disclosure exercise. It should also be noted that POL-0032853 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne. A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.

It also appears to be an attempt to obtain documents containing information that could | Request still valid. | Post Office objects to this request.

This is a request for disclosure not information. It cuts across categories 1 and 2 of Stage 3 Disclosure and is seeking to improperly expand the scope of disclosure.

Class 1 was for reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding the nature and extent of bugs, errors or defects (not limited to software) in Horizon that had the potential to cause branch accounts to be inaccurate.

Category 2 was for reports and briefings (excluding emails) produced by Post Office and submitted to Category 1, 2 or 3 Custodians regarding the nature and extent of bugs, errors or defects (not limited to software) in Horizon that had the potential to cause branch accounts to be inaccurate. |

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		potentially be tied to individual cases. That is not the purpose of the Horizon Issues trial.		
1.4	Regarding POL-0032932.doc, what is the purpose of setting an NB102 exception to F99 by FJ?	Post Office will ask Fujitsu to explain the purpose of setting an NB102 exception to F99.	Satisfied that Fujitsu will be asked to explain the cause, awaiting further information.	When there is an incident involving a reconciliation exception in Network Banking which has been fully processed, then the transaction needs to be set to F99 to indicate that processing is complete. Therefore, this is done for any transaction that appears in a reconciliation report, once the resolution is complete. The reconciliation process document is SVM/SDM/PRO/0012 RECONCILIATION AND INCIDENT MANAGEMENT PROCESS and describes how reconciliation is carried out. SVM/SDM/SD/0020 END TO END RECONCILIATION REPORTING is the specifications of the reports that are produced for the reconciliation service. The CCD that describes the contracted service: SVM/SDM/SD/0015 RECONCILIATION SERVICE: SERVICE DESCRIPTION. POL-0032909 POL-0151930 POL-0134458
	a. How often has [setting an NB102 exception to F99] occurred?	1.4(a) is a factual question and Post Office would need to interrogate the whole of its business to attempt to answer it because the information is very unlikely	With regard to " how often" this is a valid request. If it is answered for example *this is an isolated incident that impacted one transaction*	Fujitsu currently "F99" 10,000+ transactions per week across all NB102 associated reports (DCP and NBS).

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		to have been pooled or collated for this particular purpose. It should also be noted that POL-0032932 is a Fujitsu document (and one of the 100 technical documents provided to Mr Coyne). A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.	*in 2003,* a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	
	b. What is the cause of an 'Uncleared Transaction Corruptions' and how often do [Uncleared Transaction Corruptions] occur?	1.4(b) Post Office will ask Fujitsu to explain the cause of 'Uncleared Transaction Corruptions' However, "and how often do these occur" is a factual question and the response to 1.4(a) is repeated.		The DCP report NB102 section 3 (Uncleared Corruptions) usually contains 100s if not 1000s of transactions per week (Kiosk transactions only). This is where there is a discrepancy on banking and payment card transactions. To determine the exact cause of any individual Uncleared Transaction Corruption, that particular occurrence would have to be analysed. However, the most usual cause is for a banking request or authorisation failing to reach its destination, which is something that can have a variety of causes. An example may be that a bank may authorise a transaction, but that confirmation is not delivered to the counter so the SPM believes that the transaction in fact failed due to some issue.
1.5	Regarding POL-0032919.pdf, the GoldenGate replication between Oracle 10g and 11g being aborted and resulting in a number of branches reporting	The relevance of this request is not understood. Transaction Corrections are issued by Post Office to correct transient	This request is required to effectively answer part (b) of Issue 1 which is to understand whether Horizon did accurately	Post Office objects to this request. To the extent that this request goes to issue 1, which is not accepted, it cuts across categories 1 and 2 of

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	cash declaration and stock reporting discrepancies, were any transaction corrections sent to the 247 affected branches as a result of the discrepancies and which branches were affected by the incident?	discrepancies in branch accounts in order to restore the correct position. It also appears to be an attempt to obtain documents containing information that could potentially be tied to individual cases. That is not the purpose of the Horizon Issues trial.	process and record transactions. The response is required to understand full circle whether information was sufficiently collected in the event of an error, to fix it. Therefore, where branch accounts were affected, could and were they identified and was a correcting transaction issued to rectify the error.	Stage 3 Disclosure as explained above. Further, Post Office remains of the view that this appears to be an attempt to obtain documents containing information that could potentially be tied to individual cases, which is not the purpose of the Horizon Issues trial.
1.6	With regard to POL-0032901: a. Please provide how many times (and over what period) " Software faults affecting reconciliation and settlement" have been reported?	POL-0032901 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne. A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents. Further, these are factual questions and Post Office would need to interrogate the whole of its business to attempt to answer them because the information is very unlikely to have been pooled or collated for this	Request still valid. With regard to " how many times and over what period" If it is answered for example *this is an isolated incident that impacted one transaction in 2003*, a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	Post Office objects to this request. In response to request (a): Fujitsu does not record reconciliation incidents in such a way as to allow retrieval of incidents by such a category without retrospectively carrying out detailed analyses. This would require a disproportionate effort and cost.
	b. Please provide how many times (and over what period) " End-to-end APS reconciliations differences" have been reported?			In response to request (b): Fujitsu has advised Post Office that such a report does not exist.
	c. Please provide how many times (and over what period) " Reconciliation errors" have been reported and if these lead to " APS Business Incidents" ?			While POL-0032901.pdf relates to Horizon this report is still run in HNG-X and the numbers below are from the records Fujitsu now hold: 01/07/2017 - 30/06/2018: 162 APS Reconciliation Error BIMS

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		particular purpose.		01/07/2016 - 30/06/2017: 125 APS Reconciliation Error BIMS
				01/07/2015 - 30/06/2016: 104 APS Reconciliation Error BIMS
				01/07/2014 - 30/06/2015: 39 APS Reconciliation Error BIMS
				01/07/2013 - 30/06/2014: 37 APS Reconciliation Error BIMS
				01/07/2012 - 30/06/2013: 42 APS Reconciliation Error BIMS
				01/07/2011 - 30/06/2012: 33 APS Reconciliation Error BIMS
				01/07/2010 - 30/06/2011: 69 APS Reconciliation Error BIMS
				01/07/2009 - 30/06/2010: 76 APS Reconciliation Error BIMS
				01/01/2009 - 30/06/2009: 15 APS Reconciliation Error BIMS.
	d. Please provide how many times (and over what period) " reports" are produced? BIM			01/07/2017 - 30/06/2018: 2096 BIMS
				01/07/2016 - 30/06/2017: 1208 BIMS
				01/07/2015 - 30/06/2016: 1773 BIMS
				01/07/2014 - 30/06/2015: 1020 BIMS
				01/07/2013 - 30/06/2014: 1130 BIMS
				01/07/2012 - 30/06/2013: 875 BIMS
				01/07/2011 - 30/06/2012: 1013 BIMS
				01/07/2010 - 30/06/2011: 1413 BIMS

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				01/07/2009 - 30/06/2010: 3201 BIMS
				01/01/2009 - 30/06/2009: 335 BIMS
	e. Please provide how many times (and over what period) the " Problem Management Process" has recorded the potential for a system or software error?			Post Office objects to this request. Fujitsu believes that it does not record problems in such a way that would allow this to be determined without retrospectively carrying out detailed analyses. This would require a disproportionate effort and cost.
	f. Please provide how many times (and over what period) PO has been notified of a " widespread event" - as determined by this document?			Post Office objects to this request. Fujitsu believes that it does not hold collated information that would allow this to be determined without retrospectively carrying out detailed analyses of all its communications with Post Office. This would require a disproportionate effort and cost. Furthermore, this is, in substance, a request for documents and not information. Communication of problems of this nature from Fujitsu to Post Office are covered by categories 5, 6 and 7 of Stage 3 Disclosure.

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1.7	In relation to POL-0032864.doc " Data Errors / Not Data Errors" a. Please describe what "work-arounds" have previously been agreed between PO and FJ in accordance with page 6 where "…inaccuracy or error was not capable of being corrected by the User before irrevocable commitment of the cash account in question…"	Post Office understands that Fujitsu should be able to answer information request 1.7(a) and Post Office will ask Fujitsu to do so.	Awaiting further information in respect of Fujitsu providing a response to information request 1.7(a).	This request applies to the solution before the Impact Programme 2005. Fujitsu believe that "work-arounds" in this context refers to the ways in which individual errors are recorded and that such corrections would have been done with the authorisation of Post Office via the method in use at the time, e.g. OCPs. Fujitsu do not have a document that lists all of the agreed "work-arounds" and to retrospectively collate such information would be disproportionate.

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	b. How many (and over what period) were "Inaccurate Cash Account (Data Errors) recorded" and how many (and over what period) were "Manual Error Reports" issued?	Requests 1.7(b).-(f) are factual questions and Post Office would need to interrogate the whole of its business to attempt to answer them because the information is very unlikely to have been pooled or collated for any particular purpose. It should also be noted that POL-0032864 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne. A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.	1.7(b) – (f) still required. With regard to " how many times and over what period" If it is answered for example *this is an isolated incident that impacted one transaction in 2003,* a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	Fujitsu is only able to search for records in relation to the last three years and no such reports have been recorded nor issued in this time.
	c. How many (and over what period) were "Repaired Cash Accounts" or "Repaired Transaction Data" identified? For each, please provide the Classification type at para 3.6.2 of document POL-0032864.

d.   How many times has FJ notified PO of "Widespread errors" as defined at 3.6.4 of document POL-0032864?

e.   The document refers to "Preventative code" - How many times (and over what period) has such code been deployed? | | | Post Office objects to requests (c), (d) and (e).

Fujitsu has advised that while all incidents are recorded the relevant system was designed to manage individual operations not for statistical reporting for when a particular action has been taken by a Support Consultant. It would therefore require a manual review and collation of data to provide the requested information. This would be disproportionate.

Furthermore, request (d) is, in substance, a request for documents and not information. Communication of problems of this nature from Fujitsu to Post Office are covered by categories 5 and 6 and 7 of Stage 3 Disclosure. |
| | f.   How many times (and over what period) have FJ provided reports to PO in line with para 3.6.6.1, 3.6.5.3, 3.6.5.1, 3.6.5.2, 3.6.7? | | | Post Office objects to request (f). It is, in substance, a request for documents and not information. Communication of problems of this nature from Fujitsu to Post Office are covered by categories 5 and 6 of Stage 3 Disclosure.

Post Office and Fujitsu do not hold the collated information on the number of reports. It would |

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				therefore require a manual review and collation of data to provide the requested information. This would be disproportionate.
1.8	Please describe in reference to the above document at page 20 what the effects are if the data is not transmitted within five working days?	Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Awaiting further information pending Fujitsu' response.	Fujitsu assumes that this relates to the timings on the old Post Office accounting system CBDB and the timescale for getting changes into it before it passed data onto other backend systems. Due to the age of the document and nature of the question, Fujitsu have not been able to locate any relevant information.
1.9	Please provide access to the Peak system(s) for inspection with the capability to extract specific requested bugs/issues/peaks from the system(s) for later review.	This has been agreed and will be arranged pursuant to the terms of the draft Order.	One day agreed at present, second day to be arranged.	The first day of access has been provided. There is an open offer for Mr Coyne to attend for a second day.
1.10	In relation to the letter from Post Office dated 23 May 2016 to Mr C E Burke and the failure of a transaction to recover once the system was restored. Can Post Office please provide further information on: a. Why the transaction once found, was recorded as a Lloyds transaction and not TSB; b. What was the reason or cause (if it has been found) as to why the restore process in Horizon Online did not		New Request.	Post Office objects to this request. The letter to Mr Burke states that "the Transaction Correction [was] showing against Lloyds and not TSB", not the transaction. The request is therefore misconceived.

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	effectively recover the transaction(s); and			
	c. Have there been or are there any other known occurrences where the restore process has failed to recover transactions and/or attributed the wrong information (i.e., incorrect financial institution).			
1.11	How many times (and over what period) has the PO " Fraud Analysis Team" reported that a " technical" Integrity and/or " Horizon issue" has been identified?		New Request.	Post Office objects to this request. Post Office does not presently hold information on the number of "reports". It would therefore require a manual review and collation of this data to provide the requested information. This would be disproportionate. Furthermore, this request is, in substance, a request for documents and not information. Internal communications of issues of this nature are covered by category 2 of Stage 3 Disclosure.
1.12	POL-0118364 refers to reference data being modified as result of the " Peak fix" - how many times has a Live Peak fix to reference data been made?		New Request.	Post Office objects to this request. Fujitsu have advised that reference data, like all parts of the Horizon system, is subject to regular support incidents being raised which require some form of resolution. "Live Peak fixes" could therefore relate to a number of situations that have no connection to the Horizon Issues or the idea of bugs or errors in branch accounts. This request is therefore too wide to be properly understood and / or it is irrelevant to the Horizon Issues.

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				Even if the request were to be more narrowly defined such that it was relevant, it is unlikely that Fujitsu would already have collated the requested information. It would require a disproportionate effort to collate the relevant information in order to answer this request.
2.1	Please describe how SPMs receive reports of active bugs or errors regarding the Horizon system. For example, were SPMs notified about the " Local Suspense Account" problem, or " Receipts and Payments mismatch" issues (and any other known issue within Horizon)? If so, how?	The generic part of this request could be answered by Mr Coyne making enquiries of his own clients. Post Office will seek to answer the specific example (" Local Suspense Account" problem, or " Receipts and Payments mismatch" issues) by 4:00pm on 14 August 2018. The broader "any other known issue with Horizon" would require Post Office to carry out a satellite disclosure exercise and, in any event, it is clearly a fishing expedition.	The request is intended to inform the answer to Issue 2 and whether Subpostmasters were alerted to bugs, errors or defects within the Horizon system.	SPMs were notified about the "Local Suspense Account" issue. The " Receipts and Payments mismatch" issue arose in 2010 and Post Office has made enquiries to confirm how SPMs were notified of the issue but has not been able to find relevant records so far. Post Office objects to the remainder of the request for the reasons already stated.
2.2	Is there a list of error codes that Horizon has (or that FJ apply) to identify when an error/issue has occurred and the potential branch account impact?	Post Office understands from Fujitsu that there is no such list of error codes, but Fujitsu have agreed to endeavour to translate specific error codes upon request.	Jason Coyne – Please see document 180622ECR1935 00-03.doc	Post Office objects to this request. This request was made by the Claimants' Counsel to the Court at the CMC on 5 June when the Claimants asked for a list of all errors codes. The Court refused to order this. Mr Coyne's request is a reformulation of the same point.

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				Instead, the Court ordered Mr Coyne to produce a list of error codes that he wanted to understand. Post Office has provided the descriptions supplied by Fujitsu in relation to the error codes identified by Mr Coyne.
3.1	If it is the case that reports such as NB102 recorded reconciliation exceptions, what information within this report records the cause of such exceptions?	Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Response satisfactory, awaiting further information from Fujitsu.	SVM/SDM/SD/0020 END TO END RECONCILIATION REPORTING - defines the NB102 report. POL-0151930 SVM/SDM/PRO/0012 RECONCILIATION AND INCIDENT MANAGEMENT PROCESS POL-0128455 SVM/SDM/SD/0015 RECONCILIATION SERVICE: SERVICE DESCRIPTION POL-0134458 NB/HLD/003 NWB DATA RECONCILIATION SERVICE HIGH LEVEL DESIGN DES/GEN/SPE/0008 HNG-X BRANCH AND COUNTER REPORTS POL-0153186, POL-0153528 DEV/APP/LLD/0179 COUNTER REPORTS LOW LEVEL DESIGN POL-0153506 DES/GEN/SPE/0009

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				HNG-X RECEIPTS, SLIPS AND LABELS
				POL-0148790
				DES/GEN/SPE/0010
				HNG-X BANKING, CREDIT/DEBIT CARD AND ETOPUP RECEIPTS AND TEXTS
				POL-0147186
				SVM/SEC/PRO/0018
				AUDIT DATA EXTRACTION PROCESS
				POL-0215521
				SVM/SDM/SD/0017
				SECURITY MANAGEMENT SERVICE: SERVICE DESCRIPTION
3.2	With regard to POL-0032855: a. Para 1.0 - when was the "totally manual" "Error notice functionality" replaced by this process?	(a). Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Part (a) response satisfactory	As per the information shown on the front of this document (DE/LLD/014) it was functionality introduced as part of Release S80, also known as " Impulse Release 3 (Branch Trading Horizon Enhancements)", the rollout to branches being between July - September 2005. POL-0081094
	b. The document records that " central accounting function decides that it is	(b). This request is outside of the scope of the Horizon Issues as it relates	in relation to part (b), I do not consider this to be outside of the scope	Post Office objects to this request. The Horizon Issues were the subject of much negotiation between the parties and Post Office's

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	necessary to make some adjustment to the Branch Accounts" - how is this decision made?	to a reconciliation process that takes place outside of Horizon.	since adjusting the branch accounts, thereby impacts the Subpostmaster and the BRDB which is inside the boundary of Horizon. Response still required.	back-office reconciliation procedures/central accounting function were not included in the agreed Horizon Issues. This is because the Court directed that the Horizon Issues should be confined to issues that concern the Horizon system and which (a) arise on the parties' generic statements of case, (b) can be resolved by IT expert evidence, and (c) require limited, if any, evidence of fact. Request 3.2(b) does not satisfy these requirements: it cannot be resolved by IT expert evidence and it would require significant factual evidence. This request therefore relates to a subject matter that is outside of the Horizon Issues.
4.1	Regarding the acknowledgement that the Horizon system is not perfect and there has been deployment of technical controls to reduce errors, please describe:	As a general point, it should be noted that documents containing this information have been disclosed to Mr Coyne and Fujitsu have delivered an introductory briefing on the architecture of the Horizon system to Mr Coyne pursuant to paragraph 6(b) of the Third CMC Order.	Jason Coyne – (a) and (b) response satisfactory, part (c) response still required (wording amended).	This request relates to part of a sentence in the Defence which reads: " design and technical controls, when supplemented by the various accounting and cash controls applied in branches… " . Technical controls is not a defined terms and as such these two documents are provided as an example of the types of technical controls. To ask to provide all documents relating to " technical controls" as undefined would be effectively to ask to explain every technical control in place. Unless a more specific request is forthcoming (e.g. technical controls relating to X) these documents should suffice as an example. The example of data integrity has been selected in this case.
	a. What these technical controls are (referred to in Defence paragraph 16); b. For what reasons have these technical controls been triggered; and	(a) and-(b) Post Office understands that the answer to these requests should be located in document(s) and Post Office will ask Fujitsu to provide document references.		In relation to requests (a) and (b), please see the following documents. ARC/GEN/REP/0004 HORIZON DATA INTEGRITY POL-0107388 ARC/GEN/REP/1229 HORIZON ONLINE DATA

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				INTEGRITY
	c. How have the errors been dealt with?	(c) Is not understood.		Post Office objects to request (c). As to request (c), Horizon Issue 4 asks "to what extent has there been potential for errors in data recorded within Horizon to arise in (a) data entry, (b) transfer or (c) processing of data in Horizon." Request 4.1(c) goes beyond this by asking how (unspecified) errors have been dealt with. This request therefore relate to a subject matter that is not covered by the Horizon Issues. Furthermore, this question is too vague to answer. It is not understood what "errors" are under scrutiny and what is meant by them being "dealt with". Even if these points could be better defined, this question is disproportionately wide. It would require a review of all Post Office and Fujitsu operations over an 18 year period, significant disclosure and the interviewing of dozens of potential witnesses.
4.2	In relation to POL-0032913, can more information be provided on the " backlog discrepancies" held by FJ?	Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu has advised that the discrepancies described are related to banking and payments reconciliation. There were a lot of discrepancies identified in NB102 reports relating to kiosk transactions and there was an issue that because they were not being cleared down (ie set to state F99), then it was difficult to distinguish new discrepancies from old ones. These discrepancies would have had no impact on Branch Accounts as they are related to Post Office's reconciliation with Banks.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
4.3	Please describe what situation led to the process outlined in POL-0032939.doc (TPS – EPOSS Reconciliation TIP Transaction Repair) and how many transactions have been repaired?	Post Office understands that Fujitsu should be able to explain what situation led to the process outlined in POL-0032939 (TPS – EPOSS Reconciliation TIP Transaction Repair) and Post Office will ask Fujitsu to do so. The request for Post Office to describe how many transactions have been repaired is a factual question and Post Office would need to interrogate the whole of its business to attempt to answer them because the information is very unlikely to have been pooled or collated for this particular purpose. It should also be noted that POL-0032939 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne. A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.	I do not believe the reporting elements of how many transactions have been repaired have been disclosed or are likely to be found in a technical document therefore the request still stands. With regard to " how many" this is a valid request. If it is answered for example *this is an isolated incident that impacted one transaction in 2003,* a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	Fujitsu has advised that the transaction repairs were missing mandatory attributes (in the receiving systems) – particularly for Mails-based transactions, and there was a process for manually correcting these transactions before they were passed to Post Office. This would have no impact on the Branch accounts and no changes were made to Branch Transactions – it affected information needed by back end systems. POL-0032939.doc relates to fixes made in TPS and so have no impact on Branch accounts. The main situation that led to the process was transactions missing mandatory attributes and this sometimes occurred with Mails transactions on old Horizon. Such malformed transactions were permissible as far as the counter and branch accounting were concerned, but not complete enough for Post Office back end systems. Please also see: POL-0032939 POL-0149393 Post Office objects to that part of the question that requires it to quantify the number of repair. This information is not needed because this topic does not affect branch accounts. Furthermore, Fujitsu does not presently hold information on the number of repaired transactions. It would therefore require a manual review and collation of this data to provide the requested information. This would be disproportionate.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
5.1	Please provide a list of all data sources outside of Horizon that have led to discrepancies between the external data source and branch accounts of which a comparison with data inside Horizon is required.	This is not within scope of Issue 5, which is how Horizon itself compares transaction data recorded by Horizon against transaction data from sources outside of Horizon. In any event, to answer this question Post Office would need to identify every external data source that feeds data into Horizon and then review those data feeds to see if there has ever been a discrepancy between any of them and any transaction recorded in any of 10,000+ branches within the Post Office network (presumably over an 18 year period) in order to then identify the data sources that have encountered a discrepancy. To give this a sense of scale, it is noted that Horizon processes around 6,000,000 transactions per day. The scale of this exercise would be enormous.	Wording amended. Response still required. It is expected that this is a simple question to respond to as an up to date technical register should be available.	Post Office objects to this request for the reasons previously stated. However Fujitsu has advised that the following documents may be of assistance: " HorizonContext.jpg" illustrates the current direct connections and is cross-referenced to the Application Interface Specifications on the AIS sheet of the " GL Account Data Mapping.xlsx" file. " Client On Reports.zip" and " PODG Workbooks.zip" show indirect connections. Copies of these documents will be provided via Relativity.
5.2	Please describe what the process is following the discovery of a discrepancy	Post Office understands that the answer to this request should be located	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu have advised that the process depends on the discrepancy and what the sources are. If Mr Coyne has any specific requests to make following his

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	between the two sources?	in document(s) and Post Office will ask Fujitsu to provide document references.		review of the documents referred to in 5.1 above, Post Office will ask Fujitsu to provide document references.
				To the extent that this request expands into the reconciliation processes conducted by Post Office, then Post Office objects to this request for the reasons stated in 5.4 below.
5.3	If report NB102 does not identify all causes of discrepancies between Horizon and transaction data sources outside of it, then what other reports or sources exist to identify those?	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Response satisfactory, awaiting further information from Fujitsu.	The other reports are described in SVM/SDM/SD/0020, which is referred to in relation to RFI 3.1 above. POL-0151930
5.4	Once a discrepancy has been identified, what is the process for determining whether a TC or balancing transaction or should be raised?	This request relates to an accounting process that takes place outside of Horizon and it is therefore outside the scope of the Horizon Issues.	I do not agree this is outside of the scope since TCs and Balancing Transactions and/or adjustments would affect the Branch accounts which are inside the Horizon system.	Post Office objects to this request. The Horizon Issues were the subject of much negotiation between the parties and Post Office's back-office reconciliation procedures/central accounting function were not included in the agreed Horizon Issues. This is because the Court directed that the Horizon Issues should be confined to issues that concern the Horizon system and which (a) arise on the parties' generic statements of case, (b) can be resolved by IT expert evidence, and (c) require limited, if any, evidence of fact. Request 5.4 does not satisfy these requirements: it cannot be resolved by IT expert evidence and it would require significant factual evidence. This request therefore relates to a subject matter that is outside of the Horizon Issues.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
6.1	Please describe what system level logging and system events are considered when investigating shortfalls and Transaction Corrections in order to investigate cause.	Post Office understands that there will be documents which deal with system level logging and system events and Post Office will ask Fujitsu to provide document references. The phrase "when investigating shortfalls and Transaction Corrections in order to investigate cause" refers to the actions that Post Office might take to investigate a shortfall. This does not relate to Horizon and is outside the scope of the Horizon Issues.	This request is valid in respect of providing an answer to part (v) of Issue 5 and the data stored in the central data centre not being an accurate record of transactions entered on branch terminals.	Fujitsu has supplied the following references to documents that deal with system level logging and system events: DES/SYM/HLD/0001 SYSMAN4 PASSIVE/ACTIVE MONITORING SUPPORTING PLATFORMS (HNG-X) POL-0151777 SU/HLD/002 SYSMAN - NBX HLD (Horizon) POL-0076900; POL-0076988
6.2	Please describe how often JSN checks were performed in the investigation of a discrepancy/shortfall and what the results or records of differences are?	This does not relate to Horizon and is outside the scope of the Horizon Issues. Further, it is a factual question that would require Post Office to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this particular purpose.	This request is valid in respect of providing an answer to part (v) of Issue 5 and the data stored in the central data centre not being an accurate record of transactions entered on branch terminals.	Post Office assumes that Mr Coyne is referring to Issue 6(e). This request is outside the scope of the Horizon Issues for the reasons provided in relation to Request 5.4.
6.3	In relation to POL-0032915, are any technical bridge or service bridge meeting minutes (or	Post Office will undertake a reasonable and proportionate search for,	Response satisfactory, however should these upon review prompt	Post Office objects to this request. This is a request for disclosure not information. This

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	similar documentation) available (page 31)?	and then give disclosure of, any technical bridge or service bridge meeting minutes related to POL-0032915. It does not agree to disclose "other documents" as this request is too wide and imprecise.	further questions, I shall request those at a later date.	request cuts across categories 1 and 2 of Stage 3 Disclosure (which do not extend to meeting minutes). Without prejudice to that point, Fujitsu has advised that there are no separate minutes of technical bridges; the records are contained within incident reports.
6.4	Regarding Correcting Accounts for _lost_ Discrepancies - G Jenkins.pdf, how was it ultimately decided if/how FJ should be " correcting the data"	This does not relate to Horizon and is outside the scope of the Horizon Issues. ?	I disagree that this is outside of the scope. This request is valid in respect of providing an answer to part (v) of Issue 5 and the data stored in the central data centre not being an accurate record of transactions entered on branch terminals.	Post Office assumes that Mr Coyne is referring to Issue 6(e). It was agreed that the discrepancies would be fixed in POL SAP by FSC. Appendix 1 to the Claimants' Responsive Note in relation to the Third CMC is a merge of records from a conference call and a note by Gareth Jenkins. In the first part on page 3 there were 3 alternative solutions proposed. Solution 2 was actually adopted (but that was not noted in the minutes and was probably decided separately
	a. " Of the cases so far identified there is one for £30,611.16, one for £4,826.00 and the rest are all less than £350" - are these losses or gains?			The " Receipts and Payments mismatch" issue arose in 2010. Post Office has made enquiries to obtain this information but it has not been able to locate it.
	b. How many FJ users are able to adjust the Opening Figures and BTS data?			Post Office objects to this request. The request is not currently understood. Post Office is making further enquiries as to what is meant by "to adjust the Opening Figures and BTS data". Until that is understood Post Office cannot comment on this.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	c. Is there an audit trail of a decision being made by POL to 'write off' the "discrepancy' and adjusting of the Discrepancy account to align the decision in POL SAP?			Post Office objects to this request. This is a request for disclosure and not information. Request 6.4 and 6.4(c) cut across categories 6, 7, 8 and 9 of Stage 3 Disclosure. Category 5 - Reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding necessary or recommended measures for preventing/fixing bugs in Horizon that might cause branch accounts to be inaccurate. Category 6 - Reports and briefings (excluding emails) produced by Fujitsu and submitted to Category 1 or 2 Custodians regarding necessary or recommended measures for developing Horizon so to mitigate the risk that Horizon might cause branch accounts to be inaccurate. Category 7 - Reports and briefings (excluding emails) produced by Post Office and submitted to Category T, 2 or 3 Custodians regarding necessary or recommended measures. for preventing/fixing bugs in Horizon that might cause branch accounts to be inaccurate. Category 8 - Reports and briefings (excluding emails) produced by Post Office and submitted to Category 1, 2 or 3 Custodians regarding necessary or recommended measures for developing Horizon so to mitigate the risk that Horizon might cause branch accounts to be inaccurate.
6.5	With regards to POL-0032936.doc, what is the definition of a "red event" and what were the consequences of	Post Office understands that Fujitsu should be able to answer these information requests and Post Office	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu have advised that a red event is an event written to the event log which is regarded as critical. The event log is a standard Windows feature (Microsoft documentation have fully documented this

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	a red event being raised silently with no direct feedback to the operator?	will ask Fujitsu to do so.		feature). To summarise, it is just a log to which typically information events are written (just for information), warning events (worth looking at but not regarded as critical) and red events (which indicate something critical has happened). The meaning of red events does depend on context but the idea is that something has happened that must be looked at carefully.
	a. Further, how were these 'silent' events identified?			All unexpected red events are automatically monitored. Automatically monitored means that all of Fujitsu's platforms have software which looks at events and flags any red ones unless they have been specifically added to exclusion lists. Such automated monitoring is described in the document DES/SYM/HLD/0001 ' SYMPas Passive/Active Monitoring Supporting Platforms' POL-0151777
6.6	In respect of POL-0032912.docx, how many occurrences of a Peak initiator not being available or finding a suitable replacement nominee has led to a Peak not being discussed at the Business Impact Forum (BIF)/Peak Targeting Forum (PTF)?	The first part of this request ("how many occurrences of a Peak initiator not being available… is"") a factual question and Post Office would need to interrogate its business to attempt to answer them because the information is very unlikely to have been pooled or collated for any particular purpose.	Request still valid. Peaks are typically Errors/Bugs within Horizon and if they are not dealt with appropriately may lead to impact branch accounts. d) removed.	Post Office objects to this request. The request is disproportionate. To answer this question it would be necessary to read through the minutes of every BIF / PTF, and even then there may be no confirmation of the targeted events ever happening in the minutes.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	a. How often do the forums meet? The document states they are to be held weekly each Monday at 11:00am - was this true in practice?	Request 6.6(a) is unnecessary and is a request for evidence which is not appropriate.		There were 216 PTF meetings minuted between January 2013 and 19 July 2018. Prior to that the forum was referred to as RMF (Release Management Forum and there were 47 meetings minuted between January 2011 and August 2011, 87 meetings minuted between October 2009 and December 2010, 156 meetings minuted between January 2007 and April 2008 and 46 meetings minuted between April 2006 and December 2006.
	b. How many Emergency PTFs have occurred?	Request 6.6(b) factual question and Post Office would need to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for any particular purpose.		It is not possible to answer this request because the minutes of "emergency PTFs/RMFs" are not recorded differently from ordinary minutes.
	i. Further, what were the nature of these PTFs?			An "emergency" PTF would be held to discuss something before the next scheduled PTF.
	c. How are the Peaks to be discussed at the forum decided?	Requests 6.6(c) and (d) are factual questions which go beyond the scope of Issue 6 towards specific cases, which is not the purpose of the Horizon Issues trial. Without prejudice to that point, Post Office understands that the answers to these questions should be found in documents and Post Office		Fujitsu has supplied the following document references in relation to 6.6(c): SVM/SDM/STD/2593 POL-0032912; POL-0136927 SVM/SDM/PRO/1520 POL-0138750

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
		will ask Fujitsu to provide document references		
6.7	POL-0032859.doc page 6 states: " Due to the potential dynamic nature of the Reconciliation Service, where there is the potential for new exception types to be generated as a result of software errors within new releases or reference data, it has been agreed that these procedures will be documented outside of the formal Reconciliation & Incident Management CCD document set."	This is a factual question and Post Office would need to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this particular purpose.	Request modified. Request valid as it deals with potential exceptions which result from software errors.	
	a. How many " exception types" have been identified to present day?			Fujitsu have advised that no new "exception types" have ever been identified by reference to the two documents that list them: • Horizon: NB/PRO/002 Network Banking Reconciliation & Incident Management • HNG-X: SVM/SDM/PRO/0012 Reconciliation and Incident Management Joint Working Document The "exception types" listed in the first version of NB/PRO/002 (Dec 2001) are the same as those listed in the most recent version of SVM/SDM/PRO/0012 (Mar 2013). POL-0063136 POL-0032909

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
6.8	With regard to POL-0032909: a. Please provide how many times (and over what period) a " Reconciliation is the result of some system fault" that has been determined as a software or system fault. b. Please provide how many times (and over what period) there has been " Evidence of a system fault [that has needed] some corrective action" . c. Please provide how many times (and over what period) Business Incidents (as described at 3.3.1) are reported to " Fujitsu Third Line Support (SSC) for any system fault of database adjustment"	These are factual questions and Post Office would need to interrogate its whole business to attempt to answer them because the information is very unlikely to have been pooled or collated for this particular purpose.	Request still valid, this request is for information about the frequency/duration of accepted Horizon system faults/errors.	Post Office objects to this request. Fujitsu has advised that their systems were designed to manage individual operations not for statistical reporting for when a particular action has been taken by a Support Consultant. This request would therefore require a manual review and collation of this data to provide the requested information. This would be disproportionate.
	d. Please provide how many times (and over what period) DBTN Incidents (as described at 3.3.1.3) are reported.			Fujitsu has advised that it does not hold this information.
	e. Please provide how many times (and over what period) Type E03, E04, E05, E06, E07, E08, E09, E12, E13, E14, E21, E23, E25, E26, E29, E30 (as described at section) are reported.			Fujitsu has produced an excel table which will be provided via Relativity.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	f. Please provide how many times (and over what period) APS Reconciliation Errors are displayed within the APSS2133 report.			This request is the same as 1.6c above.
7.1	When FJ accessed branch accounts to modify or insert data, is the purpose recorded?	Issue 7 concerns whether Post Office and/or Fujitsu were able to access transaction data remotely.

Issue 10 concerns whether Post Office and/or Fujitsu were able to edit or delete transaction data and Issue 11 asks if they did, did Horizon have any permission controls upon the use of the facility/did it maintain a log of such actions and such permission controls. None of these issues involve factual investigations as to how many times these facilities were used, if any.

Mr Coyne's requests in relation to Issue 7 are therefore treated as if they had been made under Issue 10 and/or 11.

Post Office understands that the answer to this request should be located in document(s) and Post | Response satisfactory, awaiting further information from Fujitsu. | Fujitsu has supplied the following document references:

DEV/INF/ION/0001

Archive Server Configuration (includes reference to HNG-X BRDB Transaction Correction Tool audit data sub point)

POL-0141243

DEV/APP/LLD/0142

Host BRDB Transaction Correction Tool Low Level Design

POL-0032866

SVM/SEC/PRO/0012 Post Office Account User Access Procedure

ARC/SEC/ARC/0003 HNG-X TECHNICAL SECURITY ARCHITECTURE

DES/SEC/HLD/0004 HNG-X AUTHORISATION HIGH LEVEL DESIGN

DEV/APP/LLD/2952 Active Directory LLD design for Windows 2012

DEV/APP/LLD/0028 ACTIVE DIRECTORY LOW LEVEL DESIGN FOR HNG-X |

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
		Office will ask Fujitsu to provide document references.		
7.2	Please describe what privileges and capabilities Administrators had in relation to Branch remote access and the relevant processes and procedures?	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu has supplied the following document references: ARC/SYM/ARC/0004 HNG-X SYSTEM AND ESTATE MANAGEMENT REMOTE ACCESS AND DIAGNOSTICS DES/SYM/HLD/0017 REMOTE SUPPORT ACCESS HIGH LEVEL DESIGN SVM/SEC/PRO/0012 Post Office Account User Access Procedure ARC/SEC/ARC/0003 HNG-X TECHNICAL SECURITY ARCHITECTURE DES/SEC/HLD/0004 HNG-X AUTHORISATION HIGH LEVEL DESIGN DEV/APP/LLD/2952 Active Directory LLD design for Windows 2012 DEV/APP/LLD/0028 ACTIVE DIRECTORY LOW LEVEL DESIGN FOR HNG-X
7.3	Please describe how Transaction amendments (including reversals and balancing transactions) can be identified for those which were not carried out by the SPM in the audit/transaction data/logs (i.e,	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu has supplied the following document reference: DES/APP/HLD/0020 Branch Database High Level Design

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	is it flagged in some specific way)?	references.		
7.4	POL-0032939.doc references a tool that allows transaction data to be modified outside of branch. Please describe how such modification was audited, and how the audit files are updated? Further, how often such a tool was used?	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references, save that "how often such a tool was used" is a factual question that is outside the scope of Issues 7, 10 and 11.	Response satisfactory, awaiting further information from Fujitsu. With regard to " how often" this is a valid request. If it is answered for example *this is an isolated incident that impacted one transaction in 2003,* a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	Fujitsu has supplied the following document reference: DES/APP/HLD/0020 Branch Database High Level Design In relation to how such modification was audited and how the audit files are updated, Fujitsu has advised that: The tool can only be used on data that has failed to be delivered between the Branch Database (previously Horizon) and the TPS system. This data is quarantined within the TPS system until the Transaction Repair tool corrects it. The correction is made on the TPS database and cannot directly affect the branch accounts in the Branch Database (or previously, Horizon). Once corrected the transaction data flows to Credence and POLSAP. The corrected data is stored in TPS for 36 days and then archived on the TPS audit sub-point. Only the copy of the corrected record is kept but, if necessary, this can always be compared with the counter audit to see what has been modified. In relation to how often such a tool was used: There is a master MSC every 12 months, each time such a modification is carried out it is itemised as an MSC related to the master MSC; however master MSCs contain many various types of changes, to determine the number that relate to this particular modification type Fujitsu would have to carry out

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
				analysis of all individual tasks on all master MSCs.
				Whilst this type of action may have been taken by SSC it would have been in the context of an individual incident. All incidents are recorded but the system was designed to manage individual operations not for statistical reporting for when a particular action has been taken by a Support Consultant. Fujitsu will be able to answer questions on individual branch queries where the data is still available.
7.5	In relation to 'Operations Manual version 7 December 2006 - pages 9-13.pdf' and specifically "The introduction of the new Post Office Ltd Finance System (POLFS) in Product and Branch Accounting (PBA.) Chesterfield means that the finance teams can no longer adjust client accounts on site." a. Can it be described what "on site" means?		New Request.	In response to 7.5(a): "on site" refers to Post Office FSC.
	b. Can it be described how the process worked before this 'change' and what it entails now?			In response to 7.5(b): Prior to Transaction Corrections, branches were required to manually enter Error Notices into Horizon which were sent to them on paper. Error Notices would be accompanied by evidence (which would change depending on the type of transaction that required correcting). These were manually completed by the SPM (i.e. manually entered on to Horizon). However, once the change took place, then the Transaction Correction would be issued via Horizon and the branch would be required to accept then settle centrally.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
8.1	Please describe any reports received by PO management that display the level of shortfalls and discrepancies arising from Horizon bugs/defects. Please provide copies of such reports.	This question is not understood and requires clarification.	Wording amended, response still required.	Post Office objects to this request. This is a request for disclosure and not information.
8.2	Please describe what dictates when BIM and MER reports are produced and how often BIF and PTF meetings were held and whether meeting minutes (or similar documentation) are available for those.	This request is outside the scope of Issue 8, which asks "What transaction data and reporting functions were available through Horizon to Post Office for identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls in branches, including whether they were caused by bugs, errors and/or defects in the Horizon system".	I do not agree this is out of scope since both reports identify incidents and exceptions that had/have the potential to impact branch accounts which is within the scope of Horizon. Request still valid.	Post Office objects to this request. Post Office maintains that this request is outside the scope of Issue 8. Without prejudice to this point, the request relating to the frequency of BIF and PTF meetings is a duplicate (dealt with in 6.6 above). The request for meeting minutes is a request of disclosure and not information. It cuts across categories 1 and 2 of Stage 3 Disclosure (which do not extend to meeting minutes). The BIM and MER processes are described in detail in these two documents: SVM/SDM/SD/0015 Reconciliation Service: Service Description POL-0134458 SVM/SDM/PRO/0012 Reconciliation and Incident Management - Joint Working Document POL-0032909
8.3	In relation to POL-0032862.doc, what is the nature of the data error to be repaired as per section 3.4.3?	Post Office understands that the answer to request 8.3(a) should be located in document(s) and Post Office will ask Fujitsu to provide document	Request still valid. I understand that Business and System Incidents are the reporting functions that record occurrences and causes of shortfalls.	Fujitsu has advised that this concerns old Horizon TPS Reconciliation and Incident Management and is the same as described in response to request 4.3 above.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
		references.		
	a. What information is contained within in a " Business Incident" ?			A Business Incident relates to the ' Symptom' and not to the root cause of the exception.
	b. Is there a log of all " Business Incidents" and " System Incidents" ?	Request 8.3(b) is outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls. Without prejudice to that point, Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.		System Incidents are logged as Peaks and / or MSCs. Fujitsu has supplied the following document references in relation to request 8.3(b): PI/DES/008 TPS - EPOSS RECONCILIATION - TIP TRANSACTION REPAIR HIGH LEVEL DESIGN. POL-0032939 PI/MAN/001 TIP TRANSACTION REPAIR TOOL. POL-0149392
8.4	With regards to POL-0032841.doc Network Banking Reconciliation and Incident Management Processes: a. How many times (and over what period) are incomplete states transactions noted? b. How often were comms/harvesting/ISDN/counter issues the cause of Network Banking system States 1, 2, 4, 5, 6, 7, 12, 13, 14, 15, E01, E02,	These requests are outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls. In particular, request 8.4(b)(ii) asks for copies of reports that relate to "relevant branch accounts",	This response would directly inform the answer to Issue 8.	Post Office objects to this request. Post Office's original response is repeated.

RFI	Mr Coyne's Request	Post Office's Initial Response	Mr Coyne's Response to Post Office	Post Office's Response Pursuant to Paragraph 1 of the Fifth CMC Order
	E03, E04, E08, E09, E10,E11, E12 E13, E20, E21, E23, E26, E27, E28, E29, E30, E34, E35, E36, E37, E39: i. After investigation when had PO/FJ had to perform a financial adjustment to rectify system states? ii. Please provide copies of NB102 reports if they contain transactions that relate to relevant branch accounts.	which Post Office understands to mean the branch accounts of Claimants in this litigation. That is not within the scope of the Horizon Issues.		
8.5	With regards to POL-0032902.doc 'On line services Reconciliation & Incident Management' - please provide a list of how many "On Line Services Business Incidents" have been recorded (times & dates).	Request 8.5 is outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identify the occurrence of alleged shortfalls and the causes of alleged shortfalls.	I do not believe this is out of scope, the response would enable answer to Issue 8 and identifying whether these indicated shortfalls in branches.	Post Office objects to this request. Post Office's original response is repeated.
8.6	In respect of 'Horizon Data (status Draft) - the_Helen Rose Report_.pdf': a. Are there any other known incidents where it is suspected that a system crash occurred and subsequently " the clerk may not have been told exactly what to do." [Page 2-3]? b. What proportion of		New Request.	Post Office objects to this request. These requests are outside the scope of Issue 8 as they go beyond identifying the data and reporting functions available to identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls. In particular, request 8.6(f) asks for a statement to be explained which is a request for evidence.

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	" underlying" [Page 3] and indeed what logs are consulted to confirm whether disputed reversals are confirmed as part of Recovery?			
	c. To what does " Date" refer and how was this performed [Page 3]?			
	d. Why was there " no evidence one way or the other" [Page 3] to identify whether a system reboot did occur? Is this typical?			
	e. Is it suspected that utilising the " basic logs" for evidence in Court has previously resulted historically in " giving a true picture." Further, what are the " exports" that should be acquired by the operational team?			
	f. Can it be explained what is meant by the following statement " know you are aware of all the horizon integrity issues… [Page 3].			
	g. Was the existing ARQ report enhanced to make it clear whether a Reversal Basket was generated by Recovery or not [Page 4]? Further, if so, when			

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	did this take effect?			
	h. Is it suspected that events may have been " misinterpreted when giving evidence and using the same data for prosecutions." Has this been investigated?			
	i. Can the transaction data and logs consulted and referenced in this report be provided for review to assist in interpretation of the full issues referred to in the document?			
9.1	Please describe how often counter error logs were reviewed in the event of a reported issue and if they were available to the SPM for investigating issues?	Issue 9 asks "what transaction data and reporting functions (if any) were available through Horizon to [SPMs] for: a. identifying apparent or alleged discrepancies and shortfalls and/or the causes of the same; and b. accessing and identifying transactions recorded on Horizon Post Office understands that the answer to the question "were counter error logs available to the SPM for investigating issues" should be located in document(s) and Post	Response satisfactory, awaiting further information from Fujitsu.	Fujitsu have advised that while the term 'counter log' is ambiguous, none of the reports available to a Subpostmaster match the description 'counter log'. When investigating a reported issue a number of different logs on the counter may be uploaded from the counter to aid diagnosis – but these are not specifically error logs. These logs would be accessed as appropriate to the investigation in hand. In our letter to Freeths dated 28 September 2017 we explained that "The postofficecounterlog and messagelog (the Logs) are sometimes used by Fujitsu for, amongst other things, diagnostic purposes. For example, when a postmaster reports a technical issue to the Horizon Service Desk (HSD) it may be appropriate to use these logs to investigate the operation of Horizon in a particular branch. The Horizon system does not use the contents of the Logs for the purposes of branch accounting. The Logs are held on the terminal for a period of 30 days, following

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		Office will ask Fujitsu to provide document references. However, the remainder of this request is outside the scope of Issue 9 as it goes beyond identifying the data and reporting functions available to identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls.		which they are overwritten. Fujitsu can extract the Logs from a terminal through a manual process which takes approximately two hours. The Logs are only considered in limited situations where a postmaster alleges a technical issue which is related to the Horizon hardware and which would not otherwise have been resolved. If your clients had raised an issue of this nature in real time, then it would have been possible to investigate the Logs as necessary. This is however dependant on your clients raising issues promptly and, in this regard, we note that a number of your clients chose to conceal issues rather than escalate them."
9.2	Please describe if Discrepancy Reports have ever been provided to SPMs and if so, what was their purpose, what replaced them and when? Further, what receipts were SPMs advised NOT to be retained?	This request should be answered by Mr Coyne making enquiries of the Claimants, particularly the question "what receipts were SPMs advised NOT to be retained?" as this appears to be an allegation made by one of the Claimants (Mr Coyne does not refer to a document as the source of his question).	It is Post Office who are best aware of the agreed process and procedural documentation, this is a request simply asking for guidance on where it might be discovered. Request still valid. Second Sight reported that there are transaction types where receipts are not to be retained.	Post Office objects to this request. It is not clear what is meant by Discrepancy Reports. If Mr Coyne provides an example of the report he is referring to Post Office will make reasonable and proportionate enquiries of suitable individuals within its business to provide this information. Post Office's operations manuals have been disclosed to Mr Coyne. As Second Sight have been identified as the source of this issue, the request should be answered by Mr Coyne making enquiries Second Sight.
9.3	With regards to POL-0032836.doc ' EPOSS End-to-end Reconciliation Process For Release NR2 - Incident Management & Resolution' : a. Please provide how many (and over what period) " EPOSS	This request is outside the scope of Issue 9 (which asks what data and reporting functions were available, not how many times were they used). Further, this request would	This is not considered out of scope in respect that it is a request about reports and/or data events wholly relevant to Issue 9. Response still required.	Post Office objects to this request. This request is outside the scope of Issue 9 (which asks what data and reporting functions were available, not how many times were they used). Without prejudice to this point, these requests are for disclosure and not information. They cut across

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	reconciliation incidents" and "BCS Oxxxness incidents" have occurred. b. How many time (and over what period) were " Hardware, comm. and software incidents associated with the counter systems reported to post office" c. Also please provide a description of the class of documents (if any) which record that data has been modified (and/or transactions inserted) in Horizon in circumstances that may impact a branch' account or transactional information.	require Post Office to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this particular purpose. ?		categories 1 and 2 of Stage 3 Disclosure.
10.1	Please why branch account transactions rebuilds took place and if so, what is the process of informing the SPM or PO?	Post Office understands that the answer to request 10.1 should be located in document(s) and Post Office will ask Fujitsu to provide document references.	The current PO response to this question is not relevant to RFI 10.1, response still required.	Fujitsu has supplied the following document reference: SVM/SDM/STD/0810 RMGA ENGINEER`S MANUAL FOR BASE UNITS POL-0116724
10.2	With regard to POL-0032866.doc please set out how many times (and over what period) the "Host BRDB Transaction Correction Tool" has been used. Further, we understand that process BRDBC033 provides an audit for	This is a factual question that is outside the scope of Issue 10 (which asks whether Post Office and/or Fujitsu had certain abilities, not how many times they were used).	Request still valid. This goes directly to the modification of data. With regard to " how many times" this js a valid request. If it is answered for example *this is an isolated incident*	This tool exists in HNG-X only. This process has only been used once, in relation to PC0195561, on 11-Mar-2010. Regarding confirming that BRDBC033 provides the audit for this tool, as stated in DEV/APP/LLD/0142 section 5; one of Fujitsu's developers has checked the code and confirmed that the statement in the document is correct.

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	this tool - please confirm?		*that impacted one transaction in 2003,* a different inference can be gained than if the answer given is *10,000 transactions each day for the last ten years.*	POL-0032866
11.1	For the One Balancing Transaction that PO are aware of (Defence 57(3)) please describe how SPM were made aware?	This request is beyond the scope of Issue 11 (which asks what permission controls and logging systems were in place within Horizon in relation to any facility to edit, delete, etc. data from Horizon).	Request still valid. This request relates directly to what permission controls are in place prior to modification of data.	SPM was notified by telephone.
11.2	Please describe whether the Post Office or FJ have a log of issues/events that were reported where the discrepancy was known not to be caused by human error.	This question is not understood. It is not understood what is meant by "events". It is not understood who is said to have "reported" such and to whom.	Wording amended response still required.	Post Office objects to this request. This question is not understood. It is not understood who is said to have "reported" such and to whom.
11.3	Please describe what would determine whether a branch was informed or not of FJ carrying out a modification/addition to branch data.	This request is beyond the scope of Issue 11 (which asks what permission controls and logging systems were in place within Horizon in relation to any facility to edit, delete, etc. data from Horizon).	Request still valid. This point goes directly to whether permission was granted to remotely modify branch data.	Post Office objects to this request. The issue cited by Mr Coyne (whether permission was granted to remotely modify branch data) is outside the scope of Issue 11 (which is "*did the Horizon system have any permission controls upon the use of the above facility and did the system maintain a log of such actions and such permission controls*" emphasis added).
11.4	Please describe under what	This request is beyond the	Request still valid. The	Post Office objects to this request. The response

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	circumstances branches were told to pause usage of any equipment whilst remote actions occurred.	scope of Issue 11 (which asks what permission controls and logging systems were in place within Horizon in relation to any facility to edit, delete, etc. data from Horizon).	" pausage" is directly related to permission to control the branch.	above is repeated.
12.1	KEL cardc1655P states as a solution: "*f a counter is stuck in a ' recover loop' with the user not being able to use the counter due to not being able to complete recovery then it may be necessary to delete the affected recovery records from the brdb_rx_recovery_transactions table on the branch database. However, this can ONLY be carried out after being given express authority to do so by POL.*" Please describe how often such permissions were typically given. Please describe whether this solution was the remedy for any other KELs/issues?	This is a factual question and, in any event, Dr Worden's view is that the experts should delay questions about specific KELs until they have done a better review of KELs, and the questions can be grouped.	Request still valid. I do not agree with Dr Worden that this question should be delayed since Dr Worden has not specified when he is willing to review KELs.	Post Office objects to this request. Fujitsu have advised that the only record of these would be within the individual Peak/TfS records as each call is dealt with separately, so each would have to analysed to find similar cases. This would be disproportionate.
15.1	Please describe what evidence/reports are provided to a SPM with the Transaction Correction. Are they informed of what the specific transaction was, or combination of transactions in the event of there	Mr Coyne can obtain this information by making enquiries of his own clients.	It is not understood what is meant by my " own clients" Request still valid, response still required.	Mr Coyne's clients are the Claimants.

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	being multiple causes?			
15.2	Please provide year by year data showing a) Transaction Corrections issued and b) Transaction Correction resolution dates.	This request is outside the scope of Issue 15 (which asks how did Horizon process and / or record transaction corrections).	Request modified, response still required.	Post Office objects to this request. Post Office has already provided the information in its possession relating to the volume and value of TCs issued since 2015 and explained that this is the extent of the data available. Resolution dates are out of scope: Issue 15 simply asks "How did Horizon process and/or record Transaction Corrections?".