

From: "Matthew.Lenton" (GRO)
To: Jonathan Gribben (GRO), "ParkerSP" (GRO)
Cc: "pete.newsome" (GRO), Lucy Bremner (GRO), Andrew Parsons (GRO), "Dave.Ibbett" (GRO), "Legal.Defence" (GRO)
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]
Date: Mon, 11 Mar 2019 17:04:19 +0000
Importance: Normal
Inline-Images: image001.png; image004.png; image005.png; image006.png; image007.png

Jonny,

As per my text, it would be helpful to have a call to clarify what you are looking for in relation to Steve's statement, paras 29 and 30.

He and his team have confirmed what I said in emails below, that using revised search criteria has resulted in more than 14 instances now being identified.

The interim results of that revised search were included further down this chain, including the note that to complete the search will take further work:

0.5 Day to identify KELs which refer to Riposte insert functions that were used by the SSC to correct issues.

2.5 Days to search each matching KEL against Peak and then check each Peak to see if the KEL solution was applied.

Please would you confirm if you want that work to proceed so that a revised figure might be established with as much accuracy as the circumstances might allow.

Steve has also confirmed to me this afternoon that the statement at paragraph 30 wasn't intended to convey that the 14 occasions referred to were all during the period of Roll's employment, as some are clearly after he left.

We confirm that one of the Peaks was returned twice in the original search, so that the figure should in any case have been 13.

We confirm that the Peaks listed in the footnote do not between them provide examples of all of the six circumstances noted in 29.1 to 29.6, and additional Peaks were then cited to provide some of the examples.

Thanks

Matthew Lenton
Post Office Account Document Manager

Business & Application Services

Fujitsu

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From: Jonathan Gribben **GRO**
Sent: Monday, March 11, 2019 2:11 PM
To: Lenton, Matthew **GRO**
Cc: Newsome, Pete **GRO**; Lucy Bremner **GRO**
Andrew Parsons **GRO**; Ibbett, Dave **GRO**; Parker,
Steve **GRO**; Defence Legal (Chris Jay) **GRO**
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Hi Steve,

Will you be able to get back to me on this today please?

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

d: **GRO**
m:
t:
e:

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From: Jonathan Gribben
Sent: 09 March 2019 20:39
To: 'Matthew.Lenton' (GRO)
Cc: [pete.newsome](#) (GRO); Lucy Bremner; Andrew Parsons; [Dave.Ibbett](#) (GRO)
[ParkerSP](#) (GRO); [Legal.Defence](#) (GRO)
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Thanks Matthew.

Steve – please would you look at this ASAP?

Also, there is a duplicate in the 14 Peaks referred to in your statement – presumably that means we are talking about 13 occasions on which data was injected into the counter and not 13.

Kind regards

Jonny

From: [Matthew.Lenton](#) (GRO) (GRO)
Sent: 09 March 2019 17:37
To: Jonathan Gribben
Cc: [pete.newsome](#) (GRO); Lucy Bremner; Andrew Parsons; [Dave.Ibbett](#) (GRO)
[ParkerSP](#) (GRO); [Legal.Defence](#) (GRO)
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Jonny,

Steve and his team would have to provide the answer to your question, I don't think I can do so, but the evidence behind this part of the statement doesn't seem clear.

I think that in following up your request of 01-Mar-2019 for a similar search to be carried out “to establish (1) how many times data was injected into the computer server/data centre while Roll was employed by Fujitsu; and (2) how many of those incidents involved transaction data?” the results have suggested that the number of times data may have been injected at the counter is greater than 14, and that is as a result of different search criteria being used. Steve and his colleagues would need to comment on that.

Perhaps paragraph 30 was not intended to state that data was injected on 14 occasions *during the time that Roll was employed*, given that some of the Peaks listed in the footnote are recognisably not from the time of Roll just by their numbers (e.g. those above PC02... cannot be before 2010), but the context given by following on from para 29 appears to suggest it.

However, it has already been stated in the email below that the 14 Peaks listed in the statement do not between them provide examples of each of the six circumstances noted in 29.1 to 29.6, and additional Peaks were then cited to provide some of the examples.

Matthew Lenton
Post Office Account Document Manager

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From: Jonathan Gribben [REDACTED]
Sent: Saturday, March 9, 2019 9:42 AM
To: Lenton, Matthew [REDACTED]
Cc: Newsome, Pete [REDACTED]; Lucy Bremner [REDACTED],
Andrew Parsons [REDACTED]; Ibbett, Dave [REDACTED]; Parker,
Steve [REDACTED]; Defence Legal (Chris Jay,) [REDACTED]
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Matthew,

We need to get to the bottom of this ASAP, before the trial begins on Monday morning.

Steve's second statement explains that:

"At my request, my colleague John Simpkins (Senior Consultant), carried out a search of the incident management system for incidents which required injecting data into the counter, using any one of the following search terms: "RiposteMessageFile", "RiposteMessage", "LPO Delete", "Marooned", "RiposteObject put". From the results I can determine that this was only carried out in the following circumstances..."

Does this explain why Steve only refers to 14 Peaks? Were the others not caught by the search?

Kind regards

Jonny

Jonathan Gribben
Managing Associate

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d: **GRO**
m:
t:
e:

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From: [Matthew.Lenton](#) **GRO** [mailto:](#) **GRO**
Sent: 08 March 2019 13:41
To: Jonathan Gribben
Cc: [pete.newsome](#) **GRO** Lucy Bremner; Andrew Parsons; [Dave.Ibbett](#) **GRO**
[ParkerSP](#) **GRO**
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Jonny,

From talking to SSC, it seems that this section of Steve's WS may not be correct, in terms of there being many more than 14 instances. As examples of the six types, I have added in Peak references in your email below, those in red are not included in the list of 14 Peaks and so are examples of further instances. It is estimated that some days more work may be required to establish a more detailed account. I believe this has come to light from the analysis carried out in response to the question you were chasing this morning, from your email of the 1st March at 13:37.

I have pasted in the response from SSC below:

I believe that there are MANY more Peaks that updated objects which only mention the associated KEL.

This will require further investigation of all KELs that may have required such actions then inspect each Peak that mentions that KEL to see if it was used.

how many times data was injected into the counter while Roll was employed by Fujitsu;

| Row Labels | Count of Incident |
|--------------------|-------------------|
| CorrS | 30 |
| CorrS & Counter | 2 |
| Counter | 46 |
| Grand Total | 78 |

This totals 48

how many of those incidents involved transaction data (see paragraphs 29 – 30).

| Row Labels | Count of Incident |
|--------------------|-------------------|
| Y | 11 |
| CorrS | 5 |
| CorrS & Counter | 1 |
| Counter | 5 |
| N | 67 |
| CorrS | 25 |
| CorrS & Counter | 1 |
| Counter | 41 |
| Grand Total | 78 |

This totals 6

how many times data was injected into the computer server/data centre while Roll was employed by Fujitsu;

| Row Labels | Count of Incident |
|--------------------|-------------------|
| CorrS | 30 |
| CorrS & Counter | 2 |
| Counter | 46 |
| Grand Total | 78 |

This totals 32 (way too small)

how many of those incidents involved transaction data?

| Row Labels | Count of Incident |
|--------------------|-------------------|
| Y | 11 |
| CorrS | 5 |
| CorrS & Counter | 1 |
| Counter | 5 |
| N | 67 |
| CorrS | 25 |
| CorrS & Counter | 1 |
| Counter | 41 |
| Grand Total | 78 |

This totals 6

Expected further work, subject to being confirmed as necessary:

0.5 Day to identify KELs which refer to Riposte insert functions that were used by the SSC to correct issues.

2.5 Days to search each matching KEL against Peak and then check each Peak to see if the KEL solution was applied.

Matthew Lenton
Post Office Account Document Manager

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From: Jonathan Gribben <[GRO]>
Sent: Thursday, March 7, 2019 9:06 PM
To: Lenton, Matthew <[GRO]>
Cc: Newsome, Pete <[GRO]>; Lucy Bremner <[GRO]>;
Andrew Parsons <[GRO]>; Ibbett, Dave <[GRO]>; Parker,
Steve <[GRO]>
Subject: ****FRIDAY**** RE: Roll 2 [WBDUK-AC.FID123822914]

Thanks Matthew. I don't quite follow the response to the third bullet. In Steve's second statement he states that data was only injected into the counter in the following circumstances:-

fixing a Riposte Index at the counter; [Lenton, Matthew] **PC0060114**

removing a historic message that was influencing the balancing process on a replaced counter; [Lenton, Matthew] **PC0205753**

correcting configuration data after a PinPad change; [Lenton, Matthew] **PC0112293**

removing redundant configuration items; [Lenton, Matthew] **PC0085701**

the example given above involving five corrupted bureau transactions; and [Lenton, Matthew] **PC0175821**

removing historic recovery information. [Lenton, Matthew] **PC0249513**

The 14 Peaks are said to evidence this, i.e. there should be at least one Peak for each one of the above circumstances. Is that not the case?

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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m: [GRO]
t: [GRO]
e: [GRO]

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From: [Matthew Lenton](#) [GRO] [mailto: [GRO]]
Sent: 07 March 2019 15:34
To: Jonathan Gribben
Cc: [pete.newsome](#) [GRO]; Lucy Bremner; Andrew Parsons; [Dave Ibbett](#) [GRO]
[ParkerSP](#) [GRO]
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Jonny,

Please see responses below.

Matthew Lenton
Post Office Account Document Manager

Business & Application Services

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From: Jonathan Gribben [GRO]
Sent: Thursday, March 7, 2019 12:23 PM
To: Lenton, Matthew [GRO]
Cc: Newsome, Pete [GRO]; Lucy Bremner [GRO]
Andrew Parsons [GRO]; Ibbett, Dave [GRO]; Parker,
Steve [GRO]
Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Matthew,

Just a few further questions:-

we understand that OCRs were used minor support changes that did not required the full approval process that was needed for OCPs – did OCRs still require Post Office consent?**[Lenton, Matthew] No**

if a Peak does not refer to an OCP/OCR, does this mean that there was not an OCP/OCR in relation to an incident?
[Lenton, Matthew] Ideally yes, however we cannot be certain as it is a manual action to add or type the reference, so an OCR/OCP could still have been raised but the reference not added to the Peak.

of the 14 Peaks referred to below, can you tell me which relate to:-

- o fixing a Riposte Index at the counter;**[Lenton, Matthew] 1 with supplemental fix as below (PC0060114)**
- o removing a historic message that was influencing the balancing process on a replaced counter; and**[Lenton, Matthew] None**
- o removing redundant configuration items.**[Lenton, Matthew] 11**

(I think one of PC 0060114, 01760799 and 0203896 relates to each of the above).

[Lenton, Matthew] The other type is:

PC0060114: Correction Message insertion. PM aware. No OCR/OCP mentioned

PC0175821: Correction Message insertion. PM aware. OCP21918 & OCR 21847

Thank you in advance.

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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From: Jonathan Gribben

Sent: 07 March 2019 11:55

To: 'Matthew.Lenton'; **GRO**

Cc: [pete.newsome](#); **GRO**; Lucy Bremner; Andrew Parsons; [Dave.Ibbett](#); **GRO**

[ParkerSP6](#); **GRO**

Subject: RE: Roll 2 [WBDUK-AC.FID123822914]

Matthew,

That's great, thank you. Given that some of the end dates are 2010, are we happy that they all relate to Legacy Horizon?

Also, in para 28.4 Steve says that he can see from PC0175281 that the transaction insertion had the additional property "Comment:PC0175821" inserted, but we can't see that anywhere in the peak. Is it in one of the hyperlinks and, if so, can you send me the document please?

Kind regards

Jonny

From: [Matthew.Lenton](#) [GRO]
Sent: 07 March 2019 11:42
To: Jonathan Gribben
Cc: [pete.newsome](#) [GRO]; Lucy Bremner; Andrew Parsons; [Dave.Ibbett](#) [GRO]
[ParkerSP](#) [GRO]
Subject: FW: Roll 2 [WBDUK-AC.FID123822914]

Jonny,

I've added in the open and close dates of each of the Peaks in the email below; R Roll was employed 05-Mar-2001 to 17-Sep-2004, therefore only the first Peak (highlighted) has any overlap with his period of employment. From what I can understand of that Peak however, it looks like the actual change being referred to was done on 11-Jan-2001, the rest of the call is about trying to obtain an events report, but in the end it appears that they give up as the issue has been fixed.

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Post Office Account Document Manager

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From: Jonathan Gribben [GRO]
Sent: Thursday, March 7, 2019 11:08 AM
To: Lenton, Matthew [GRO]

Cc: Newsome, Pete <[REDACTED]>; Ibbett, Dave <[REDACTED]>; Andrew
Parsons <[REDACTED]>; Lucy Bremner <[REDACTED]>
Subject: FW: Roll 2 [WBODUK-AC.FID123822914]

Matthew,

An urgent question has arisen in relation to paragraph 30 of Steve's second statement. In that paragraph Steve states that transactions were only injected into the counter "in the following circumstances while Mr Roll was employed by Fujitsu (emphasis added):-

- 29.1 fixing a Riposte Index at the counter;
- 29.2 removing a historic message that was influencing the balancing process on a replaced counter;
- 29.3 correcting configuration data after a PinPad change;
- 29.4 removing redundant configuration items;
- 29.5 the example given above involving five corrupted bureau transactions; and
- 29.6 removing historic recovery information."

This is based on the content of row 6 in the table below. Steve's statement goes on to say that this only happened on 14 occasions and only one of those involved transaction data. The 14 occasions were:

PC0060114 {POL-0234909}, [Lenton, Matthew] 20-Dec-2000 - 28-Mar-2001

PC0112293 {POL-0283845}, [Lenton, Matthew] 09-Dec-2004 - 14-Dec-2004

PC0112293 {POL-0283845}, [Lenton, Matthew] Duplicate of above

PC0112397 {POL-0283948}, [Lenton, Matthew] 13-Dec-2004 - 13-Dec-2004

PC0112650 {POL-0284204}, [Lenton, Matthew] 17-Dec-2004 - 20-Dec-2004

PC0112659 {POL-0284213}, [Lenton, Matthew] 17-Dec-2004 - 20-Dec-2004

PC0118037 {POL-0289559}, [Lenton, Matthew] 24-Mar-2005 - 24-Mar-2005

PC0122806 {POL-0293307}, [Lenton, Matthew] 05-Jul-2005 - 05-Jul-2005

PC0170799 {POL-0341013}, [Lenton, Matthew] 03-Dec-2008 - 05-Dec-2008

PC0175821 {POL-0345994}, [Lenton, Matthew] 19-Feb-2009 - 20-Mar-2009

PC0182141 {POL-0352240}, [Lenton, Matthew] 02-Jun-2009 - 04-Jun-2009

PC0198266 {POL-0368128}, [Lenton, Matthew] 28-Apr-2010 - 16-Jul-2010

PC0201613 {POL-0371420}, [Lenton, Matthew] 15-Jul-2010 - 29-Jul-2010

PC0203896 {POL-0373686}, [Lenton, Matthew] 03-Sep-2010 - 07-Sep-2010

It appears that the 14 occasions actually span the life of Legacy Horizon, rather than the period during which Roll was employed. Is that right?

Please would you get back to me ASAP?

Kind regards

Jonny

Jonathan Gribben

Managing Associate
Womble Bond Dickinson (UK) LLP

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t:
e:

GRO

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From: [Matthew.Lenton@GRO](#) [mailto:[GRO](#)]
Sent: 25 January 2019 13:02
To: Jonathan Gribben
Cc: [SHenderson@GRO](#); Lucy Bremner; [ParkerSP@GRO](#); [Dave.Ibbett@GRO](#)
[pete.newsome@GRO](#); Gareth Jenkins <[GRO](#)>; Andrew
Parsons
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

Please see below an update which we believe completes the response to action 3 as the remaining 16 incidents referred to yesterday have now been analysed.

Additions in red are additional events not present in the data sent to you on 24-Jan-2019. Changes in text are shown with strikethrough.

Matthew Lenton
Post Office Account Document Manager

P&PS, Digital Technology Services

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From: Lenton, Matthew
Sent: 24 January 2019 17:58
To: 'Jonathan Gribben' <[GRO](#)>
Cc: 'SHenderson@GRO'; [GRO](#); 'Lucy Bremner' <[GRO](#)>; Parker, Steve <[GRO](#)>; Ibbett, Dave

GRO >; Newsome, Pete GRO >; 'Gareth Jenkins
GRO >; 'Andrew Parsons'
GRO
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

Please see below, a response is now added for action 3, which we think is mostly complete but will update further. No other changes to the table.

Matthew Lenton
Post Office Account Document Manager

P&PS, Digital Technology Services

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Lovelace Road, Bracknell, Berkshire, RG12 8SN

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From: Lenton, Matthew
Sent: 24 January 2019 13:31
To: 'Jonathan Gribben' GRO
Cc: SHenderson GRO; Lucy Bremner GRO; Parker, Steve
GRO; Ibbett, Dave GRO; Newsome, Pete
GRO; Gareth Jenkins GRO
GRO; Andrew Parsons GRO
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

Please see below revised table with responses added for actions 6 and 8.

Actions 3 and 9 are still being worked on, but an update is included in those rows.

| Action | Paragraph of Roll 2 | Action | Assigned to | Fujitsu |
|--------|---------------------|---|-------------|--|
| 1 | 8 | Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc. <i>[Matthew Lenton] Peak references provided 22-Jan-2019</i> | Fujitsu | Steve / SSC <i>[Matthew Lenton] Completed</i> |
| 2 | 8 | Check what the experts and witnesses say about KEL psted2847n. | WBD | |
| 3 | 9 | Provide a list of events that give rise to a receipts and payments mismatch | Fujitsu | Steve / |

SSC

*[Matthew Lenton]
Response
provided
at left.**Updated
25-Jan-
2019*

Because of the volume of data here (735 incidents) and the need to eyeball each one we're restricted the initial analysis to the 390 calls opened between 1999 and Jan 2002 (inc.). After this the beat rate significantly decreased (only 345 in the subsequent 8 years). This is believed to be due to the version M1 rollout (summer 2001) which appears to have significantly increased the reliability in this area.

Analysis

| Category | Calls | Residue | Comment | Event |
|---|-------|---------|--|----------------|
| Orange Prepay Issue | 99 | 291 | Jan 2002. Reference data / software issue. Urgent software fix applied within a week. | Software error |
| Newly migrated offices (paper to PC) | 61 | 230 | Oct 1999 – Nov 2001. Hot spots July – Sep 2000, March 2001. Migration figures accepted inevitably lead to R&P issue. No software fault. | Migration |
| Erroneous settlement of Transfer Out and Transfer In transactions to Cash (KEL DRowe50K) | 39 | 191 | April 2001 - June 2001. Corrected cash accounts provided to Post Office Networks (PON). Counter software fix @ release M1, which rolled out from May 2001. | Software error |
| 'Balancing Error: Receipts and payments do not match, please | 14 | 177 | March 2001 – July 2001. Reconciliation data has been | Software error |

| | | | | | | |
|--|--|----|--|---|---|----------------|
| | | | investigate. The error may be corrected using Reversal Function. WARNING: Continuing may lead to an unbalanced Cash Account" (KEL DRowe1625K) | | provided to PON (suspect this was corrected cash accounts). Counter software fix @ release M1, which rolled out from May 2001. | |
| | | 8 | 169 | Stock unit being rolled over twice before the Cash Account is rolled. (KEL LKiang1222L, GMaxwell159r) | March 2001 – May 2001. Corrected cash accounts provided to PON. Counter software fix @ release M1, which rolled out from May 2001. | Software error |
| | | 17 | 152 | Single Counter Outlet (SCO) was replaced, without synchronising the messagestore. (KEL JBallantyne5328R) | November 2000 – November 2001. Reconciliation Data provided to PON. Mismatch between receipts and payments is due to a self originated message which overwrote a transaction on the counter messagestore. MSU noted in Nov 2001: This type of R & P incident is the only one we still get regularly. Is there anything that can be/is being done to fix it? | Software error |

| | | | | |
|---|---------------------|-----------------------|--|-------------------------|
| | | | Software fix @ release BI2. | |
| Software fixes. May be related to above KELs, or other issues. | 27 29 | 125 123 | April 2000 – December 2001. 12 @ CI4. 10 @ M1. 5 @ other. 7 @ other. | Software error |
| Reference data. Either rollout timetable not followed, resulting in unavailable local products such as OBCS, or products ending and stock remaining. | 13 | 112 110 | July 2000 – December 2001. OBCS products will have become available, later than expected. | Reference Data Error |
| Duplicate incidents within the set being analysed e.g. branch reports the same issue flagged on Fujitsu's host cash account report, or vice versa | 34 | 78 76 | September 2000 – December 2001. | Admin Ignore |
| Reconciliation resolved. May be related to above KELs, or other issues. | 41 | 37 35 | August 2000 – December 2001. Identified by data centre reporting. Root cause cannot be determined from Peak Information provided to POL to give correct view of accounts | Unknown |
| No fault, not R&P Peaks, etc | 11 | 26 24 | September 2000 – January 2002 | Admin Ignore |
| Temp Closed offices | 5 | 21 19 | May 2001 – January 2002 | POL Process |

| | | | | |
|----------------|-------------------|---------------------|---|---------------------------|
| | | | Correct outlet close process not followed. Information archived (e.g. Balance brought forward) by system. | Error |
| Hardware swaps | 5 9 | 16 10 | July 2000 – October 2001 May 2000 – November 2001 | Engineering process error |
| User | 4 | 6 | August 2000 – July 2001 A&G for PM or Trainers, which sometimes wasn't followed (PC0065358). PM ignoring on screen messages (PC0053164). One call where PM accepted shortage, then a call was raised (PC0067250), possibly indicating lack of understanding. Another call (PC0068191) reads like lack of PM understanding of the Cash Account. | Training |
| Unclear | 6 | 0 | July 2000 – June 2001 Insufficient evidence to comment. | Unclear |

For 2002, 101 of the 124 calls raised that year were opened in January. 99 of those were for the Orange Prepay issue. Only 1 call was opened in February.

| | | | | | | | | | | | | | | | | | | |
|---|---|---|-------------------------------------|---|---|---|--|---------------------|--|---------------------|-------------|--|---|---|---|--|---------|--|
| 4 | 12 | Did Post Office review TC volumes in order to identify potential software issues. | WBD to pick up with POL | | | | | | | | | | | | | | | |
| 5 | 16 | Review the contract between POL and Fujitsu and summarise SLAs/penalties. | WBD | | | | | | | | | | | | | | | |
| 6 | 20 | <div>Provide a list of reasons for which transaction data would need to be injected at the counter.</div> <table><tr><td>Issue with Riposte index at counter</td><td>Potential financial impact because the wrong value or quantity was being used for a product</td></tr><tr><td>Last historic message stored at counter was incorrectly being considered as part of a balancing process</td><td>No financial impact. PM recognised that data presented was too old.</td></tr><tr><td>Config data relating to PinPad needs to be deleted if PinPad is removed from counter. AKA PinPad LPO delete.</td><td>No financial impact</td></tr><tr><td>Old configuration objects local to counter needed to be removed.</td><td>No Financial impact</td></tr><tr><td>LPO Delete.</td><td></td></tr><tr><td>Five corrupted bureau transactions on counter</td><td>Financial impact (PC0175821) Changes approved by POL Documented on BIMS</td></tr><tr><td>PM left AP recovery for too long. Usually same / next day not months. Ref data for product referenced in AP recovery removed. Impossible for PM to complete recovery. Objects deleted. LPO delete</td><td>Possible but unlikely financial impact due to age of recovery information.</td></tr></table> <div>* LPO=Local Persistent object. Configuration object used by the Riposte system. By its nature, requires intervention at counter.</div> <div>Note: Last case (RiposteObject command) still being worked on. This relates to configuration information (similar to LPO above) and will not have any financial impact so is for completeness only.</div> <div>Method</div> <div>We searched the following databases to try and identify the incidents for which transaction data has been inserted at the counter:</div> <div>KEL: Known Error Log</div> | Issue with Riposte index at counter | Potential financial impact because the wrong value or quantity was being used for a product | Last historic message stored at counter was incorrectly being considered as part of a balancing process | No financial impact. PM recognised that data presented was too old. | Config data relating to PinPad needs to be deleted if PinPad is removed from counter. AKA PinPad LPO delete. | No financial impact | Old configuration objects local to counter needed to be removed. | No Financial impact | LPO Delete. | | Five corrupted bureau transactions on counter | Financial impact (PC0175821) Changes approved by POL Documented on BIMS | PM left AP recovery for too long. Usually same / next day not months. Ref data for product referenced in AP recovery removed. Impossible for PM to complete recovery. Objects deleted. LPO delete | Possible but unlikely financial impact due to age of recovery information. | Fujitsu | Steve / SSC Can this be ascertained from the sampling referred to below at 9? [Matthew Lenton] Response provided at left, 24-Jan-2019. |
| Issue with Riposte index at counter | Potential financial impact because the wrong value or quantity was being used for a product | | | | | | | | | | | | | | | | | |
| Last historic message stored at counter was incorrectly being considered as part of a balancing process | No financial impact. PM recognised that data presented was too old. | | | | | | | | | | | | | | | | | |
| Config data relating to PinPad needs to be deleted if PinPad is removed from counter. AKA PinPad LPO delete. | No financial impact | | | | | | | | | | | | | | | | | |
| Old configuration objects local to counter needed to be removed. | No Financial impact | | | | | | | | | | | | | | | | | |
| LPO Delete. | | | | | | | | | | | | | | | | | | |
| Five corrupted bureau transactions on counter | Financial impact (PC0175821) Changes approved by POL Documented on BIMS | | | | | | | | | | | | | | | | | |
| PM left AP recovery for too long. Usually same / next day not months. Ref data for product referenced in AP recovery removed. Impossible for PM to complete recovery. Objects deleted. LPO delete | Possible but unlikely financial impact due to age of recovery information. | | | | | | | | | | | | | | | | | |

| | | <p>OCP: Operational Change Processes OCR / OCP</p> <p>Peak: Incident management system</p> <table><tr><th>System</th><th>Search Keywords</th></tr><tr><td>KEL</td><td>RiposteMessageFile</td></tr><tr><td>KEL</td><td>LPO Delete</td></tr><tr><td>KEL</td><td>Marooned</td></tr><tr><td>OCP</td><td>RiposteMessageFile</td></tr><tr><td>OCP</td><td>LPO Delete</td></tr><tr><td>OCP</td><td>Marooned</td></tr><tr><td>OCP</td><td>RiposteObject put</td></tr><tr><td>Peak</td><td>RiposteMessageFileRiposteMessage</td></tr><tr><td>Peak</td><td>LPO Delete</td></tr><tr><td>Peak</td><td>JBallant498J</td></tr><tr><td>Peak</td><td>MYoung5043M</td></tr><tr><td>Peak</td><td>Marooned</td></tr><tr><td>Peak</td><td>RiposteObject put</td></tr></table> | System | Search Keywords | KEL | RiposteMessageFile | KEL | LPO Delete | KEL | Marooned | OCP | RiposteMessageFile | OCP | LPO Delete | OCP | Marooned | OCP | RiposteObject put | Peak | RiposteMessageFileRiposteMessage | Peak | LPO Delete | Peak | JBallant498J | Peak | MYoung5043M | Peak | Marooned | Peak | RiposteObject put | | |
|--------|----------------------------------|--|---------|---|-----|--------------------|-----|------------|-----|----------|-----|--------------------|-----|------------|-----|----------|-----|-------------------|------|----------------------------------|------|------------|------|--------------|------|-------------|------|----------|------|-------------------|--|--|
| System | Search Keywords | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KEL | RiposteMessageFile | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KEL | LPO Delete | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| KEL | Marooned | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OCP | RiposteMessageFile | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OCP | LPO Delete | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OCP | Marooned | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| OCP | RiposteObject put | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | RiposteMessageFileRiposteMessage | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | LPO Delete | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | JBallant498J | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | MYoung5043M | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | Marooned | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Peak | RiposteObject put | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 7 | 20 | Review Peak reference 107043 (example of transaction being injected into counter). | WBD | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 8 | 21 | <p>Did: (1) Belfast team; and (2) privileged users have the ability to inject transaction data between 2001 and 2004? Do they have that ability now?</p> <p><u>Gareth Jenkins:</u> <i>With Horizon Online, there is the Transaction Correction Tool which can inject transactions and this is controlled by SSC. It is audited when it runs and we have only used it once in March 2010. The DBAs in Belfast can in theory do anything to the BRDB. In practice they will run scripts tested by dev as part of a systems upgrade if DB changes are required. Any such access is audited and since 2015 the actual commands run are also audited.</i></p> <p><i>With old Horizon, control was weaker. SSC could inject into Correspondence Servers and also at the counter.</i></p> <p><u>Belfast team:</u> <i>Belfast had administrative access to the correspondence servers and had a <u>theoretical</u> ability to inject data into the messagestores, but don't believe that they had the technical understanding to do so.</i></p> <p><i>Belfast had no access to counters, UNIX/NT team having no users and no knowledge of administrative user accounts/passwords.</i></p> <p><i>They would not have injected any data unless it happened to be done by scripts that they were asked to run and which were provided under</i></p> | Fujitsu | <i>[Matthew Lenton] Response provided at left, 24-Jan-2019.</i> | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | |
|----|---------|--|---------|---|
| | | <i>change control. Direct manipulation of the messagestore wasn't something that they knew how to do and would not have attempted to do lest it break the running applications which harvested/inserted data. Their understanding of the actual messages was very low/non-existent so would have had no confidence in making any insertion.</i> | | |
| 9 | 21 | <p>Review a sample of OCPs to give an indication as to how frequently transaction data was injected.</p> <p><i>[Matthew Lenton] This is proving difficult to provide. The original plan was to examine sample months of change control data and produce rough figures. As Pete Newsome already discussed with you, this lead to it becoming apparent that support did not use formal change control in the earlier years for BAU support actions. We relied on the audit trail within the incidents (Peaks) to document support actions. We had auditability of the work done but no change control entries. We assume that the reasoning behind this was to allow implementation of support actions ASAP, and the audit trail being good enough where there was no financial impact.</i></p> <p><i>Therefore we are still looking at how / if we can provide an accurate answer to this question for the earlier years.</i></p> | Fujitsu | <p>Steve / SSC – relates to 6 above?</p> <p><i>[Matthew Lenton] Update at left.</i></p> |
| 10 | 22 | Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example). | WBD | |
| 11 | General | <p>Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available?</p> <p><i>[Matthew Lenton] Answered 22-Jan-2019</i></p> | Fujitsu | <p>Matthew</p> <p><i>[Matthew Lenton] Completed</i></p> |

Matthew Lenton
Post Office Account Document Manager

P&PS, Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN

Phone: GRO

Email: GRO

Web: <https://www.fujitsu.com/global/>

From: Jonathan Gribben [<mailto:jon.gribben@fujitsu.com>] GRO
Sent: 24 January 2019 09:56
To: Lenton, Matthew GRO >
Cc: [SHenderson](#) GRO; Lucy Bremner GRO >; Parker, Steve GRO; Ibbett, Dave GRO >; Newsome, Pete GRO; Gareth Jenkins GRO <>; Andrew Parsons GRO >
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]
Importance: High

Matthew,

Please would you provide an update in relation to the below this morning?

Kind regards

Jonny

Jonathan Gribben

Managing Associate
Womble Bond Dickinson (UK) LLP

d: 
m:
t:
e:

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From: [Matthew.Lenton@GRO](#) [mailto:[GRO](#)]
Sent: 22 January 2019 15:46
To: Jonathan Gribben
Cc: [SHenderson@GRO](#); Lucy Bremner; [ParkerSP@GRO](#); [Dave.Ibbett@GRO](#)
[pete.newsome@GRO](#); Gareth Jenkins; [GRO](#)
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Jonny,

I've numbered the actions 1 – 11 below, and added the responses so far to actions 1 and 11 in the Actions column, and some notes on progress etc. to the Fujitsu column.


Matthew Lenton
Post Office Account Document Manager

P&PS, Digital Technology Services

Fujitsu

Lovelace Road, Bracknell, Berkshire, RG12 8SN

Phone: 

Email: 

Web: <https://www.fujitsu.com/global/>

From: Jonathan Gribben [mailto:[GRO](#)]
Sent: 21 January 2019 17:39
To: Parker, Steve [mailto:[GRO](#)]; Ibbett, Dave [mailto:[GRO](#)]; Newsome, Pete [mailto:[GRO](#)]; Lenton, Matthew [mailto:[GRO](#)]; Gareth Jenkins [mailto:[GRO](#)]
Cc: Simon Henderson [mailto:[GRO](#)]; Lucy Bremner [mailto:[GRO](#)]
Subject: RE: Roll 2 [WBDUK-AC.FID27032497]

Dear all,

Privileged & Confidential

Thank you for your time earlier. Here's a list of the actions that I captured from today's calls. Please let me know if there's anything you'd like to add or change:-

| Action | Paragraph of Roll 2 | Action | Assigned to | Fujitsu |
|--------|---------------------|---|-------------|---|
| 1 | 8 | <p>Keyword search for incidents containing the words "laptop" and/or "luggable" and/or "outreach" etc.</p> <p><i>The Peaks referenced below</i></p> <p><u>PC0100174 March 1st 2004 to 5th March 2004</u></p> <p><i>FAD317309 reporting: Horizon Kit rebooting itself for no apparent reason.</i></p> <p><i>Helpdesk user: "Over the past 2-3 weeks engineers have been to site and have replaced 2xBU's and 2xPSU's but the problem persists."</i></p> <p><i>BU = base units = PC itself. PSU = Power supply units within the base units</i></p> <p><i>RR "Evidence (from event logs) shows that the power is being switched off every morning shortly (ie 5 or 6 minutes) before the PM logs on"</i></p> <p><i>RR: "After carrying out tests on our rigs, I have been able to duplicate the problem here on ONE of our rigs but not on others. It seems that the Screen Power Button is incorrectly connected to the motherboard."</i></p> <p><i>RR: "We have now identified two instances of this, one in live. This is a hardware build quality issue."</i></p> | Fujitsu | <p>Steve / SSC</p> <p><i>[Matthew Lenton] Details of Peaks provided at left.</i></p> |

This was followed by:

PC0100899 18th March 2004 to 24th March 2004.

Hardware returned from site to Bracknell for examination.

RR: "Tests carried out on screen power switch - working correctly, no further action required."

Your questions 2d,e,f,g

d) Is his example true, or could it have been true: Yes. Can find no data on the origin for the statement: "This is a hardware build quality issue". Could be a discussion with engineering which was not recorded on the incident progress. Information we have only describes the hardware issue being seen internally to FJ on one instance of test rig hardware. No hardware error proved on the site.

If so, how often did that sort of problem occur: Very rare. Only one other found using keywords "standby", "laptop", "luggable". PC0055550 which was a problem on prototype hardware going into standby mode.

What would have caused it: Inconclusive. No information on root cause of issue reported by the Post Master onsite. Could be a hardware problem, could be user miss-operation of hardware.

Could it have affected/did it affect branch accounts: No. Once powered on the unit would function as normal.

If so, might its effect on branch accounts never have been detected with the result that some SPMs might have been wrongly held liable for false deficits: No

e) Would Rolls have disassembled laptops and done the other things he describes in para 8:

Have to assume he did as per the incident updates. I expect he had some assistance (especially with kit on test rigs - different team totally) but unable to substantiate.

Would he have had/did he have the conversation with his manager he describes in para 8: Just can't answer this. My analysis of the issue would suggest that it turned out to be unimportant because there was no proof that this ever happened in the live estate and that his comment of "This is a hardware build quality issue" is simply conjecture. However, he may have discussed with engineering and truly discovered a batch of faulty hardware. I would

| | | | | |
|----|----|---|-------------------------|---|
| | | <p>have expected an update in the incident reading "Discussed with xxxxxxxx in engineering and we determined that..... Bad batch..... etc" No such updates are present.</p> <p>f) Was the problem referred to in para kept secret, as claimed at the end of para 8: No evidence either way. I would not expect that to be the case. It is not in Fujitsu's interest to have faulty equipment that is not corrected damaging reputation.</p> <p>g) Would Fujitsu management have known/did it know about this problem? Would/did Post Office? If not, why not: No way of knowing. Information no longer exists</p> | | |
| 2 | 8 | Check what the experts and witnesses say about KEL psted2847n. | WBD | |
| 3 | 9 | Provide a list of events that give rise to a receipts and payments mismatch. | Fujitsu | <p>Steve / SSC</p> <p>Examples only, or all scenarios that caused them in reality?</p> <p><i>[Matthew Lenton] May take rest of this week or more. Requires eyeball searching.</i></p> |
| 4 | 12 | Did Post Office review TC volumes in order to identify potential software issues. | WBD to pick up with POL | |
| 5 | 16 | Review the contract between POL and Fujitsu and summarise SLAs/penalties. | WBD | |
| 6 | 20 | Provide a list of reasons for which transaction data would need to be injected at the counter. | Fujitsu | <p>Steve / SSC</p> <p>Can this be ascertained from the sampling referred to below at 21?</p> <p><i>[Matthew Lenton] SSC forming a query to find this from OCP data, also determining when transaction would be injected at the counter.</i></p> |
| 7 | 20 | Review Peak reference 107043 (example of transaction being injected into counter). | WBD | |
| 8 | 21 | Did: (1) Belfast team; and (2) privileged users have the ability to inject transaction data between 2001 and 2004? Do they have that ability now? | Fujitsu | Gareth: answer 1 and 2 and perhaps explain again difference between old and new? |
| 9 | 21 | Review a sample of OCPs to give an indication as to how frequently transaction data was injected. | Fujitsu | <p>Steve / SSC – relates to 20 above?</p> <p><i>[Matthew Lenton] See action 6 above</i></p> |
| 10 | 22 | Search for documents relating to the controls around transaction data being injected (DE/HLD/002 is an example). | WBD | |

| | | | | |
|----|---------|--|---------|--|
| 11 | General | <p>Provide details of Fujitsu's document storage practices and retention policies. Are emails, word documents etc. from 2001 – 2004 available?</p> <p><i>[Matthew Lenton] Emails cannot be retrieved from the accounts of former Fujitsu employees from that period, and back ups are not held for that period of time. The only records of such a person's emails would be if they are part of a current employee's email account or pst archive, in which case it would be only the subset of their emails that were to or from the other user. Similarly, for other documentation that was held locally be individual employees on their laptops, that would have been deleted when the user left.</i></p> <p><i>As we have already seen, some limited information from this period does exist, stored in Dimensions and other networked repositories, some of which we have already provided in connection with this case.</i></p> | Fujitsu | <p>Matthew</p> <p><i>[Matthew Lenton] See answer at left</i></p> |
|----|---------|--|---------|--|

We are aiming to get a draft response to Roll 2 into circulation by early tomorrow afternoon.

Kind regards

Jonny

Jonathan Gribben

Managing Associate
Womble Bond Dickinson (UK) LLP



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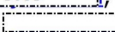
womblebond dickinson.com



From: Jonathan Gribben

Sent: 21 January 2019 11:05

To: 'ParkerSP'  [Dave.Ibbett](#)  [pete.newsome](#) 
[Matthew.Lenton](#)  Gareth Jenkins <

Cc: Simon Henderson  Lucy Bremner

Subject: Roll 2 [WBDUK-AC.FID27032497]

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To discuss

Jonny

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