

From: Jonathan Gribben [GRO]
To: robert worden [GRO]; Andrew Parsons [GRO]
Cc: Lucy Bremner [GRO]; 'Chris Emery' [GRO]

Subject: RE: Paper on claimant data [WBDUK-AC.FID27032497]

Date: Wed, 1 Aug 2018 09:09:20 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.png; image004.png; imagee254a0.PNG; image6b9a02.PNG; image27ad6c.PNG; imagec61383.PNG

Hi Robert,

Thank you for this. I'll find out what the art of the possible is from Fujitsu in terms of giving Coyne all of the underlying documents.

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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

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From: robert worden [GRO]
Sent: 01 August 2018 09:17
To: Jonathan Gribben; Andrew Parsons
Cc: Lucy Bremner; 'Chris Emery'
Subject: RE: Paper on claimant data [WBDUK-AC.FID27032497]

Hi Jonny:

Our comments on Mr C's requests are as follows:

v) PEAK and/or TfS records where the error or issue resulted in financial impact to either Post Office or a Subpostmaster.

Request (v) - Coyne is basically asking WBD to do his job for him. There are a large number of PEAK and TfS records, and the job of filtering them all to see which ones have financial impact is what the experts need to do - it would be disproportionate to ask FJ to do such a large complex manual job.

I am tempted to suggest - ship Coyne a dump of the entire PEAK database, which he can run up on SQL server or the appropriate DBMS. Or grant him read-only access to the PEAK system, if that is possible. Then he can search it himself. A database dump can't be that big - I bet it fits on a disc of a few TB. (If WBD did that, we might be given the same thing but I don't know that we'd do much with it. Rather than set up a database, we'd prefer to access the PEAK system remotely)

vi) PEAK and/or TfS records for any Claimant who has a record including any audit data for the period (at least a month) of the PEAK/TfS record.

Request (vi). This does not make sense - or more politely, the request is not clear. PEAK and TfS records are not 'for claimants' or 'for individual subpostmasters'. He apparently wants all PEAKs and TfS which span certain periods. If Coyne sends a list of months of interest to him, it might then be possible to do an automatic filter of PEAK and TfS records covering those months. But given there are 250,000 PEAK records for 216 months, if Coyne selects even 20 months this will give him about 20,000 PEAKs to look at. You might as well send him the lot, as suggested above.

viii) A copy of any Master Service Change ("MSC") OR Operational Corrective Requests ("OCR") OR Operation Control Procedures ("OCP") [as outlined in POL-0074909] where the data to be changed has had a financial impact on Post Office or where they relate to fixing a peak.

Request (vii) is in the same category as (v) - asking FJ to do his job for him. Looking for any financial impact is a complex manual filtering task which cannot be imposed on FJ. It would be good to know how many MSC, OCR, and OCP there are - we should be able to get a figure from FJ. If there are not too many, we might want to scan a few of them. If there are a lot, it is another needle in a haystack job.

Best Regards

Robert

From: Jonathan Gribben [mailto:[REDACTED]] [GRO]
Sent: 31 July 2018 16:32
To: robert worden; Andrew Parsons
Cc: Lucy Bremner; 'Chris Emery'
Subject: RE: Paper on claimant data [WBDUK-AC.FID27032497]

Hi Robert,

No crisis, just the Stage 3 Disclosure deadline.

How are you fixed for a call tomorrow? It looks like Andy and I are both available from 3:30pm to 4:30pm if that suits?

In the meantime, I'd be grateful for your thoughts as to what Coyne is driving at with requests v), vi) and viii) in his 20 July email (attached for ease of reference). Leaving to one side the fact that they are requests for documents rather than information, we don't really understand what they mean or what he is hoping to gain from them.

Kind regards

Jonny

Jonathan Gribben
Managing Associate
Womble Bond Dickinson (UK) LLP

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From: robert worden [mailto:[REDACTED]] [GRO]
Sent: 31 July 2018 11:39
To: Andrew Parsons; Jonathan Gribben
Cc: Lucy Bremner; 'Chris Emery'
Subject: Paper on claimant data
Importance: High

Andy, Jonny -

Maybe there is some crisis on? We'd really like to discuss the paper on claimant data that I sent on Friday, when you have a moment. Attached again.

Best wishes

Robert

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