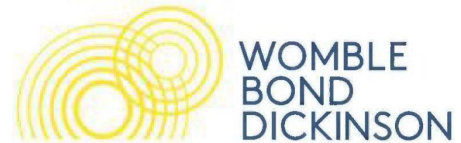


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3 October 2018

Second Letter

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By email only

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Dear Sirs

**Post Office Group Action  
Horizon Issues Trial – Defendant's Stage 3 Disclosure**

We refer to your letter of 19 September 2018.

As an overarching response to your letter, Post Office has undertaken its disclosure exercise in a transparent manner and sought to assist the Claimants by providing additional information and assistance where possible.

In contrast, the Claimants have failed to engage with the concerns that Post Office has raised about the methods by which the Claimants' have undertaken their disclosure, which have included the application of redactions, the multiples rounds of delayed disclosure and the scope of Stage 3 Disclosure. Those concerns have now been raised on numerous occasions, and most recently in our second and third letters of 12 September 2018 to which we are yet to receive a response.

We note that the majority of the queries in your letter of 19 September 2018 could have been answered without assistance from Post Office, simply by using the facilities available through your e-disclosure platform to search the documents and metadata we have disclosed. We have been able to respond to your queries on that basis. Before raising concerns and queries about the disclosure provided by Post Office, please analyse the information, data and documents which have already been provided. The time and effort required to respond to your queries is a matter which will be raised when the costs of disclosure fall to be considered.

**1. DATE RANGES FOR STAGE 3 DISCLOSURE**

- 1.1 Your letter raises concerns that a limited number of documents have been disclosed by Post Office within the relevant date periods and sets out, by reference to the various tranches of disclosure, the date periods in which you believe limited disclosure has been provided. We have addressed below each of the document sets with which you raise concern.

**Known Error Log ("KEL") (disclosed on 10 May 2018)**

- 1.2 As explained in our letter of 9 May 2018, the KEL entries are stored in Fujitsu's proprietary database. Fujitsu extracted the documents from this database, which were then uploaded to our

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e-disclosure platform. None of the KEL entries which were extracted by Fujitsu and provided to us were withheld from disclosure on the basis of privilege or relevancy.

- 1.3 Your letter states that fewer than 30 documents in this category have been disclosed in each year from 2000 – 2003. Using the document dates of the KEL entries, the data below has been extracted from our e-disclosure platform, which shows that a far greater number of documents between these date ranges have in fact been disclosed. For completeness, we have included a full list of date ranges. The metadata containing the document date was provided to you during disclosure and is readily available for you to analyse in your e-disclosure platform.

Document Date	Total
2018	208
2017	562
2016	329
2015	333
2014	324
2013	425
2012	439
2011	608
2010	1,002
2009	917
2008	541
2007	320
2006	412
2005	542
2004	634
2003	479
2002	104
2001	89
2000	128
1999	23

- 1.4 As brought to your attention in our letter of 9 May 2018, due to the nature in which the documents are stored, it was not possible to extract the creation and revision dates. However, to ensure that the dates of the KEL entries were available for analysis, Post Office incurred additional expense in extracting the document dates contained within the KEL entries and

overlaying this information onto each of the documents metadata in the data room. Post Office took steps to ensure that the Claimants were able to undertake their own analysis of the date ranges and we expected such analysis would be undertaken before issues are raised with us.

**Claimants' request for Horizon Technical Documents (disclosed on 10 April 2018)**

- 1.5 The documents disclosed within this batch were the 100 documents selected by the Claimants pursuant to paragraph 7 of the Third CMC Order. Post Office provided disclosure of the specific documents sought by the Claimants and did not therefore control the date ranges which these fell within. Having disclosed to you the documents you requested, we do not understand what legitimate criticism you can make. Nevertheless, if the Claimants wished to be provided with documents within the 1996-2003 date range, they could have requested them six months ago.

**Horizon Technical Disclosure (disclosed on 18 July 2018)**

- 1.6 Your letter confirms that 47 documents were disclosed on 18 July 2018 which were part of the Horizon Technical Disclosure. As explained below, the Horizon Technical Disclosure Post Office provided on this date was formed of documents sourced from Dimensions that had previously been withheld from inspection on the concern that they contained privileged material.
- 1.7 As explained in our letter of 17 May 2018, through keyword searching it was identified that 10,758 (32,702 when families are included) of the documents stored within Dimensions (which was the source of the Horizon Technical Disclosure) may contain privileged material and inspection of these documents was not provided. However, a list of the documents withheld was provided to you at that time. By way of our letters of 17 May, 17 July and 23 July 2018 an invitation was given that if there were a small number of non-disclosed Dimensions documents which the Claimants' Expert wished to review, then we would be open to reviewing these on an individual basis. This same opportunity was also open to Dr Worden.
- 1.8 In relation to the 47 documents disclosed on 18 July 2018, Dr Worden had identified a small number of the Dimensions documents which fell within the above pool and which were of interest to him. As per the open invitation to the Claimants' Expert, following Dr Worden's request for these documents, they were reviewed for privilege and provided to Dr Worden. To ensure equality of information between the parties' experts these documents were then provided to you by way of further disclosure.
- 1.9 Whilst the disclosure provided on 18 July 2018 was a small number of documents from a limited date range, this disclosure cannot be taken in isolation from the wider class of Horizon Technical Disclosure of which it was part (being technical documents regarding Horizon stored by Fujitsu in its Dimensions system). Post Office has provided disclosure of approximately 112,000 documents within this class spanning from 1995 to 2018, as follows:

Document Date	Total
2018	665
2017	2,887
2016	4,172
2015	3,775
2014	3,613
2013	5,742
2012	3,296



Document Date	Total
2011	3,422
2010	5,981
2009	14,147
2008	7,900
2007	9,152
2006	4,163
2005	5,290
2004	6,268
2003	4,423
2002	5,787
2001	5,245
2000	5,775
1999	4,696
1998	2,936
1997	2,619
1996	151
1995	18

**Stage 3 Disclosure (disclosed on 3 July, 18 July, 2 August and 28 August 2018)**

- 1.10 The remaining document sets which you raise concerns with form part of Stage 3 Disclosure. Your letter seeks to consider each disclosure list in isolation from the other disclosure lists by raising concerns that limited documents from particular years were provided in each list. These stages of disclosure cannot be considered in isolation from each other. For example, whilst one Stage 3 Disclosure list may contain no, or limited, documents from 2003, these documents may be included within another Stage 3 Disclosure list.
- 1.11 Your letter asks for us to set out the process of identifying, reviewing and disclosing relevant documents for Stage 3 Disclosure and confirm why there appears to be such a limited number of documents disclosed in each stage during relevant periods. In our letters of 22 June, 1 August and 10 August 2018 we have already provided detailed explanations of the steps taken in relation to each class of document. We will not repeat in this letter information already been provided to you.

**2. THIRD PARTY REPORTS**

- 2.1 Since the requests in your letter for disclosure of third party reports refer to particular documents within an identified date range, Post Office will take steps to locate these documents and provide disclosure of them. It should be noted that the scope of this disclosure will be to the reports



which you have specifically referred to in your requests and not a broader search for all third party reports which have been produced. We anticipate that locating and reviewing these documents will take a couple of weeks and we will provide an update shortly.

### 3. FURTHER DISCLOSURE

- 3.1 Your letter requests disclosure of documents which relate to the incidents and issues referred to in POL-0171024 and POL-0217341. As currently drafted, your requests for disclosure do not enable Post Office to make targeted searches for documents that would relate to these matters. So that Post Office can understand and consider the further disclosure which you now seek, please provide your requests in the form of a Model C request, specifying either a particular or narrow class of document relating to a particular Issue for Disclosure, as required under the Disclosure Pilot for the Business and Property Courts.
- 3.2 We note your comments on the redaction of POL-0171022. As explained in section 3 of our letter of 5 September 2018, some of the documents disclosed in Stage 3 Disclosure were reports to Post Office's Board of Directors and Group Executive and the minutes arising from their meetings. POL-0171022 was one of these documents. The documents submitted to these groups and committees (and the minutes and actions arising therefrom) cover a multitude of matters which are being brought to their attention, only one of which is Horizon. The non-relevant information contained within such documents was therefore redacted on the basis that it was irrelevant to any issue in these proceedings and was confidential. Further, some of the contents of these documents would also be covered by legal privilege.

### 4. FUJITSU ADVICE

- 4.1 We note that your request for disclosure relates to the operation of POLSAP. We shall be writing separately on this topic shortly.

### 5. DOCUMENT VERSIONS

- 5.1 As previously expressed in our letter of 28 June 2018, the claim being brought against Post Office spans a period of 20 years and touches upon the majority of Post Office network operations. It would neither be reasonable nor proportionate for Post Office to undertake a disclosure exercise which would necessarily locate every document (and versions of that document) which has ever been created over that 20 year period.
- 5.2 The Disclosure Pilot was in large part adopted for that reason, which required Post Office to undertake a reasonable and proportionate search for specified classes of documents. Post Office has done so. For Post Office to locate all versions of every document would require it to search an enormous number of sources where drafts / previous versions of documents could be stored (for example, it would require the extraction of email accounts for numerous individuals who may have circulated for comment draft documents which may have not been saved to a shared location).
- 5.3 Nevertheless, in relation to your 37 requests for disclosure of all versions of a document, 33 of your requests relate to documents which were sourced from Dimensions (Fujitsu's technical document repository). For these documents there are a number of methods by which the Claimants' could have undertaken their own analysis and confirmed that disclosure of all versions had been provided.
  - 5.3.1 An index of the documents within Dimensions was provided to you on 21 November 2017 (**Dimensions Index**). The Dimensions Index contained a list of the documents stored in Dimensions, but importantly also confirmed the different versions of each document that were stored in Dimensions. The Claimants have therefore been made aware of the versions of these documents that exist.
  - 5.3.2 Each document sourced from Dimensions has a unique reference code (ie. CS/PRO/144) which is also part of the file name metadata (ie. CSPRO144\_0.1.doc). A search in your e-disclosure platform for documents which have a name similar to

"CSPRO144" would have brought to your attention all versions of this document that had been disclosed.

- 5.3.3 Each document sourced from Dimensions contains a version number. This can be located in either the file name (ie. "CSPRO144\_0.1.doc" – this is version 0.1 of the document), or within the contents of the documents. Each of the documents contains a document control / document history section which lists the versions which have been produced. A brief review of this section would have allowed you to confirm whether there were any versions which have not been disclosed.
- 5.3.4 As explained in paragraph 1.7 above, a number of the documents sourced from Dimensions were not provided for inspection. A list of these documents was however provided and there remains an open invitation to request inspection of these documents if required by the Claimants' Expert. If there were particular versions of a document which were not provided for inspection, then it was open to you to review the list and request inspection. 6 of your 37 requests fall within this category and it was known to you why inspection of these documents had not been provided.
- 5.4 As shown from the above, the knowledge of the versions in existence and the versions which have been disclosed / provided for inspection was openly provided to you. Post Office and the Claimants have access to the same information and are able to undertake the same analysis. From an analysis of the documents disclosed and the Dimensions Index you could have easily confirmed whether any versions which were stored within Dimensions had not been disclosed.
- 5.5 In responding to your requests, we have been required to undertake this analysis on your behalf. For 26 of your requests, Post Office has already provided disclosure of all versions listed within the Dimensions Index and there was no basis on which to make requests for further disclosure.
- 5.6 It should be kept in mind that Post Office was required to provide disclosure of *"technical documents regarding Horizon stored by Fujitsu in Dimensions systems"*. If a version of a document sourced from Dimensions systems is held in an alternative source (ie. attached to an email), then Post Office was not ordered to search and give disclosure of such documents.
- 5.7 Before making further requests of this nature, please confirm that you have conducted appropriate searches and checks of the documents and metadata which has already been disclosed (and describe such searches and checks), and taken into account the requirement for Post Office to have undertaken a reasonable and proportionate search for documents. Post Office is willing to assist in the event that your queries cannot be answered on the basis of the information already provided. However, if it later transpires that adequate documents / metadata were available then Post Office reserves its rights to recover the costs incurred in responding to your queries.
- 5.8 In this instance, we have considered each of your requests and our responses are contained at Schedule 1 to this letter.

Yours faithfully

Womble Bond Dickinson (UK) LLP

Womble Bond Dickinson (UK) LLP

## SCHEDULE 1

Request No	Document Title	Versions disclosed	WBD Comments
1	Recovery - Horizon Online Quick Reference Guide	POL-0156359 (Version 1) POL-0172112 (Version 4) POL-0001727 (Version 5)	Please see our comments at paragraph 5.1 above in relation to the requirement for Post Office to provide disclosure of all versions of this document.
2	Helpline Call Logs	The documents referred to are logs of a call with the Horizon Service Desk. These documents seem to be duplicates of each other rather than being different versions. Given that the documents are logs to which entries are added, and the logs run from the query being opened to closed, we do not understand how a different version of this document would exist.	We would welcome clarification on your concerns.
3	Horizon Online Data Integrity for Post Office Ltd	The document identified was sourced from Dimensions, with reference number ARC/GEN/REP/1229.  Versions 0 and 4.1 of this document have been disclosed (see POL-0219298 and POL-0119414).	As explained at paragraph 5.3.4 above, some versions of ARC/GEN/REP/1229 were not provided for inspection since they were responsive to a privileged keyword. These documents were brought to your attention in the document list provided alongside disclosure.  On the basis of your request for inspection, we shall review the withheld versions of this document for privilege and provide inspection as necessary.
4	Initial Complaint Review and Mediation Scheme: Factfile	POL-0022841 and POL-0022845 (13 March 2014) POL-0022854 (17 March 2014) POL-0022996 and POL-0023002 (16 April 2014)	This document was contained within the Second Sight Disclosure. Keyword searching of the Second Sight documents has identified that one version of this document has not been disclosed since it is a duplicate of POL-0022996.  Please see our comments at paragraph 5.1 above in relation to the requirement for Post Office to provide disclosure of all versions of this document.
5	Network Banking Reconciliation and Incident Management	The document identified was sourced from Dimensions, with reference number CS/PRO/144.	All versions listed in the Dimensions Index have been disclosed and provided for



Request No	Document Title	Versions disclosed	WBD Comments
	Processes	Versions 0, 0.1, 0.2, 0.3 and 0.4 of this document have been disclosed (see POL-0066399, POL-0066428, POL-0068677, POL-0069252, POL-0069686 & POL-0032841).	inspection.
6	POLSAP High Level Design	The document identified was sourced from Dimensions, with reference number POLSAP/DES/INF/HLD/0003.  Versions 0, 0.1, 0.2, 0.3, 0.4, 0.5, 0.6, 0.7 and 2 of this document have been disclosed (see POL-0104381, POL-0104384, POL-0104780, POL-0105557, POL-0105760, POL-0105799, POL-0106282, POL-0108332 & POL-0112589).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
7	Reconciliation and Incident Management Joint Working Document	The document identified was sourced from Dimensions, with reference number SVM/SDM/PRO/0012.  Versions 0, 0.1, 1.0, 1.1, 1.2, 2.0, 2.1, 3.0 and 3.1 of this document have been disclosed (see POL-0085859, POL-0089723, POL-0090031, POL-0122123, POL-0122640, POL-0123255, POL-0124274, POL-012513 & POL-0128455).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
8	Terms of Reference for POA BIF and PTF	The document identified was sourced from Dimensions, with reference number SVM/SDM/STD/2593.  Versions 0, 0.3 and 1.0 of this document have been disclosed (see POL-0136729, POL-0136730, POL-0136927).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
9	TPS - EPOSS Reconciliation - TIP Transaction Repair	The document identified was sourced from Dimensions, with reference number PI/DES/008.  Versions 0 and 3.0 of this document have been disclosed (see POL-0032939 and POL-0054975).	As explained at paragraph 5.3.4 above, some versions of PI/DES/008 were not provided for inspection since they were responsive to a privileged keyword. These documents were brought to your attention in the document list provided alongside disclosure.  On the basis of your request for inspection, we shall review the withheld versions of this document for privilege and provide inspection as necessary.

Request No	Document Title	Versions disclosed	WBD Comments
10	Data Reconciliation Service High Level Design Delta for HNG-X	The document identified was sourced from Dimensions, with reference number DES/APP/HLD/0033.  Versions 0, 0.1, 0.2, 0.3, 0.4, 0.5, 1 and withdrawn of this document have been disclosed (see POL-0088757, POL-0088767, POL-0088821, POL-0090506, POL-0090520, POL-0090866, POL-0107129 & POL-0150431).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
11	End to End Reconciliation Reporting	The document identified was sourced from Dimensions, with reference number SVM/SDM/SD/0020.  Versions 0, 0.1 1.0, 1.1, 1.2, 1.3, 2.0, 2.1, 2.2, 3.0, 3.1, 3.2 and 4.0 have been disclosed (see POL-0086661, POL-0088261, POL-0089703, POL-0101896, POL-0121412, POL-0121986, POL-0123253, POL-0123908, POL-0124572, POL-0125222, POL-0128357, POL-0147778 & POL-0151930).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
12	NR2 Electronic Point of Sale Service: Processes and Procedures Description	The document identified was sourced from Dimensions, with reference number CS/PRO/021.  Versions 0.2, 0.3, 0.5, 1, 1.1, 2, 2.1, 3, 3.1 & 4 have been disclosed (see POL-0045569, POL-0045627, POL-0047537, POL-0049632, POL-0049587, POL-0050412, POL-0049668, POL-0051949, POL-0050590 and POL-0058732)	With the exception of version 0.1, all versions listed in the Dimensions Index have been disclosed and provided for inspection.  Version 0.1 was withheld on the basis that it may contain privileged material and shall be reviewed for disclosure.
13	CS Support Services Operations Manual	The document identified was sourced from Dimensions, with reference number CS/QMS/004.  Versions 0, 0.1, 1.0 and 2.0 have been disclosed (see POL-0056527, POL-0056428, POL-0057174 and POL-0061572).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
14	EFTPoS System Requirements Specification	The document identified was sourced from Dimensions, with reference number NB/SRS/002.  Versions 0, 0.1, 0.2, 0.3, 0.4, 0.5, 0.6, 1.0 have been disclosed (see POL-0063168, POL-0061135, POL-0063023, POL-0062681, POL-0062288, POL-0061934, POL-0061799 and POL-0061605).	With the exception of version 1.1, all versions listed in the Dimensions Index have been disclosed and provided for inspection..  Version 1.1 was withheld on the basis that it may contain privileged material and shall be reviewed for disclosure.

Request No	Document Title	Versions disclosed	WBD Comments
15	Customer Service Operational Change Procedure	The document identified was sourced from Dimensions, with reference number CS/PRD/019.  Versions 0, 0.1, 0.4, 0.5, 1 and withdrawn have been disclosed (see POL-0122699, POL-0074909, POL-0067439, POL-0074471, POL-0072842 and POL-0068342).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
16	TPS HR SAP Summarisation & Transaction Corrections HLD	The document identified was sourced from Dimensions, with reference number EA/HLD/009.  Versions 0, 0.1, 0.2, 1 and withdrawn have been disclosed (see POL-0032924, POL-0076077, POL-0076419, POL-0076747 and POL-0077336).	As explained at paragraph 5.3.4 above, some versions of EA/HLD/009 were not provided for inspection since they were responsive to a privileged keyword. These documents were brought to your attention in the document list provided alongside disclosure.  On the basis of your request for inspection, we shall review the withheld versions of this document for privilege and provide inspection as necessary.
17	TES Reconciliation File Delivery Reporting Low Level Design	The document identified was sourced from Dimensions, with reference number NB/LLD/079.  Version 0, 0.1 and 1.0 of this document have been disclosed (see POL-0076003, POL-0077442 and POL-0077734).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
18	S80 Impact Release 3 EPOSS Counter Operational Support Guide	The document identified was sourced from Dimensions, with reference number EP/SPG/001.  Versions 0, 0.1, 0.2 and 1.0 have been disclosed (see POL-0081468, POL-0081475, POL-0081677 and POL-0081931).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
19	TPS Reconciliation & Incident Management	The document identified was sourced from Dimensions, with reference number CS/PRO/111.  Versions 0, 0.2, 0.3, 0.7, 0.8, 1.0, 1.1, 1.2, 1.3, 2.0, 4.0, 4.1, 4.2, 5.0, 5.1 and withdrawn have been disclosed (see POL-0032862, POL-0050665, POL-0051981, POL-0052032, POL-0055555, POL-0056280, POL-0056673, POL-0060096, POL-0061068, POL-0062722, POL-0065590, POL-0069169, POL-0082393, POL-0082789, POL-	All versions listed in the Dimensions Index have been disclosed and provided for inspection.



Request No	Document Title	Versions disclosed	WBD Comments
		0083720, POL-0084137, POL-0106060 and POL-0122636)	
20	S80 Release Note - Deferred PEAKS List - Counter	The document identified was sourced from Dimensions, with reference number CS/REN/032.  Versions 0.1, 0.2 and 1.0 have been disclosed (see POL-0032858, POL-0082654, POL-0083918 and POL-0083919).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
21	HNG-X Integration Architecture	The document identified was sourced from Dimensions, with reference number ARC/APP/ARC/0002.  Versions 0, 0.1, 0.2, 0.3, 0.4, 1.0 and withdrawn have been disclosed (see POL-0086691, POL-0087822, POL-0087918, POL-0088572, POL-0089294, POL-0089295, POL-0122124 and POL-0215821).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
22	S80 Release Closure Report	The document identified was sourced from Dimensions, with reference number PM/REP/013.  Versions 0.1 and 1 have been disclosed. Version 0 has not been disclosed since it is a blank, irrelevant document (see POL-0087402 and POL-0089062).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
23	Customer Services Architecture for HNG-X	The document identified was sourced from Dimensions, with reference number ARC/SVS/ARC/0002.  Versions 0, 0.1, 0.2, 1.0, 1.1, 1.2, 1.3, 1.4, 1.5, 2.0 and withdrawn have been disclosed (see POL-0087780, POL-0088363, POL-0089410, POL-0092380, POL-0096156, POL-0102501, POL-0102505, POL-0102663, POL-0118411, POL-0118696 and POL-0144846).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
24	Counter Type X Reference Data Definitions	The document identified was sourced from Dimensions, with reference number DES/GEN/SPE/0003.  50 versions of this document have been disclosed (see POL-0091530, POL-0093019, POL-0095270, POL-0108345, POL-0109841, POL-0109904, POL-0116292, POL-0118363, POL-0118364, POL-0118514, POL-0118779, POL-0118780, POL-0119386, POL-0119389, POL-0119391, POL-	All versions listed in the Dimensions Index have been disclosed and provided for inspection.

Request No	Document Title	Versions disclosed	WBD Comments
		0119841, POL-0120863, POL-0121200, POL-0121435, POL-0122046, POL-0122254, POL-0122751, POL-0123552, POL-0123676, POL-0123828, POL-0123887, POL-0124001, POL-0124114, POL-0124375, POL-0124376, POL-0124438, POL-0124476, POL-0124920, POL-0126521, POL-0127475, POL-0129358, POL-0132294, POL-0134665, POL-0134703, POL-0135089, POL-0135492, POL-0135793, POL-0137565, POL-0138000, POL-0138676, POL-0138813, POL-0152997, POL-0153125, POL-0153126 and POL-0153156).	
25	End to End Reconciliation Reporting	The document identified was sourced from Dimensions, with reference number SVM/SDM/SD/0020.  Versions 0, 0.1, 1.0, 1.1, 1.2, 1.3, 2.0, 2.1, 2.2, 3.0, 3.1, 3.2 and 4.0 have been disclosed (see POL-0032990, POL-0086661, POL-0088261, POL-0089703, POL-0101896, POL-0121412, POL-0121986, POL-0123253, POL-0123908, POL-0124572, POL-0125222, POL-0128357, POL-0147778 and POL-0151930).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
26	Reconciliation and Incident Management Joint Working Document	The document identified was sourced from Dimensions, with reference number SVM/SDM/PRO/0012.  Versions 0, 0.1, 1.0, 1.1, 1.2, 2.0, 2.1, 3.0 and 3.1 have been disclosed (see POL-0032909, POL-0085859, POL-0089723, POL-0090031, POL-0122123, POL-0122640, POL-0123255, POL-0124274, POL-0125134, POL-0128455 and POL-0219191)	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
27	Post Office Account User Access Procedure	The document identified was sourced from Dimensions, with reference number SVM/SEC/PRO/0012.  Versions 0, 1.0, 1.1, 2.0, 2.1, 2.2, 2.3, 3.0, 3.1, 3.2, 3.3, 3.4, 4.0, 4.2, 4.3, 5.0, 6.0, 6.1, 7.2 and 11.0 have been disclosed.  (See POL-0102632, POL-0105750, POL-0111809, POL-0112029, POL-0116878, POL-0117484, POL-	As explained at paragraph 5.3.4 above, some versions of SVM/SEC/PRO/0012 were not provided for inspection since they were responsive to a privileged keyword. These documents were brought to your attention in the document list provided alongside disclosure.

Request No	Document Title	Versions disclosed	WBD Comments
		0118350, POL-0118402, POL-0122741, POL-0123087, POL-0123273, POL-0123669, POL-0123670, POL-0127970, POL-0128317, POL-0130267, POL-0135036 and POL-0219307).	On the basis of your request for inspection, we shall review the withheld versions of this document for privilege and provide inspection as necessary.
28	Reconciliation Service: Service Description	The document identified was sourced from Dimensions, with reference number SVM/SDM/SD/0015.  Versions 0, 1.0, 1.1, 2.0, 2.1, 2.2, 3.0, 3.1, 3.2, 3.3 and 4.0 have been disclosed (see POL-0085843, POL-0087427, POL-0101897, POL-0105583, POL-0117557, POL-0118624, POL-0118793, POL-0124479, POL-0129268, POL-0134061 and POL-0134458).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
29	HNG-X Counter Business Application Support Guide	The document identified was sourced from Dimensions, with reference number DEV/APP/SPG/0017.  60 versions of this document have been disclosed (see POL-0102551, POL-0104021, POL-0104453, POL-0104515, POL-0104647, POL-0104738, POL-0104948, POL-0105244, POL-0105262, POL-0105614, POL-0105628, POL-0105662, POL-0105699, POL-0105956, POL-0106266, POL-0106471, POL-0106583, POL-0106724, POL-0106761, POL-0106828, POL-0106964, POL-0106994, POL-0107391, POL-0108164, POL-0108180, POL-0109862, POL-0109885, POL-0115808, POL-0118425, POL-0118543, POL-0118795, POL-0119444, POL-0119852, POL-0122062, POL-0122838, POL-0124328, POL-0124921, POL-0125163, POL-0131339, POL-0131730, POL-0134853, POL-0136565, POL-0138832, POL-0139298, POL-0140717, POL-0142015, POL-0142202, POL-0142562, POL-0142771, POL-0144371, POL-0144583, POL-0147353, POL-0147568, POL-0147577, POL-0148737, POL-0149381, POL-0150898, POL-0150961, POL-0152081 and POL-0152243)	All versions listed in the Dimensions Index have been disclosed and provided for inspection.



Request No	Document Title	Versions disclosed	WBD Comments
30	Post Incident Report: POLSAP Filesystem Incident 5th January 2015	The document identified was sourced from Dimensions, with reference number SVM/SDM/INR/2690.  Versions 0, 0.1 and 1.0 have been disclosed (see POL-0032930, POL-0138618, POL-0138619 and POL-0143426).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
31	Post Office Account Customer Service Problem Management Procedure	The document identified was sourced from Dimensions, with reference number SVM/SDM/PRO/0025.  21 versions of this document have been disclosed (see POL-0095344, POL-0095738, POL-0096375, POL-0096377, POL-0096378, POL-0098438, POL-0098579, POL-0122602, POL-0122603, POL-0133552, POL-0134358, POL-0134722, POL-0136582, POL-0136903, POL-0142011, POL-0142012, POL-0143789, POL-0146393, POL-0146787, POL-0149801 and POL-0152874).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
32	Schema Definition for Branch Database, Standby Branch Database And Branch Support System	The document identified was sourced from Dimensions, with reference number DEV/APP/LLD/0199.  33 versions of this document have been disclosed (see POL-0109815, POL-0112914, POL-0120342, POL-0121273, POL-0121276, POL-0121441, POL-0122430, POL-0122567, POL-0122818, POL-0125046, POL-0127111, POL-0127138, POL-0128152, POL-0128346, POL-0128999, POL-0130525, POL-0135617, POL-0136902, POL-0137398, POL-0137698, POL-0138053, POL-0138171, POL-0142654, POL-0143381, POL-0148901, POL-0149425, POL-0150916, POL-0151019, POL-0151020, POL-0151369, POL-0151693, POL-0151776 and POL-0153576).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
33	Post Incident Report: Banking, Card Payment, E Top Up and APOP outage	The document identified was sourced from Dimensions, with reference number SVM/SDM/INR/3299.  Versions 0, 0.1, 0.2, 0.3, and 1.0 have been disclosed (see POL-0032995, POL-0148678, POL-0148705, POL-0148706, POL-0151924 and POL-0151983).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.

Request No	Document Title	Versions disclosed	WBD Comments
34	Post Incident Report: Batch processing outage	The document identified was sourced from Dimensions, with reference number SVM/SDM/INR/3343.  Versions 0, 0.1, 0.2 and 1.0 have been disclosed, being all versions listed in the Dimensions Index (see POL-0032997, POL-0149729, POL-0150430, POL-0151603 and POL-0152261).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
35	Post Office Account Customer Service Problem Management Procedure	Duplicate of Request 31.	See Request 31.
36	Post Office Account Operations Duty Manager Handbook	The document identified was sourced from Dimensions, with reference number SVM/SDM/MAN/2378.  14 versions of this documents have been disclosed (see POL-0134245, POL-0134919, POL-0135148, POL-0136607, POL-0137242, POL-0138744, POL-0139242, POL-0142013, POL-0143412, POL-0143675, POL-0152235, POL-0152895, POL-0152897 and POL-0153426).	All versions listed in the Dimensions Index have been disclosed and provided for inspection.
37	Management Letter for the year ended 27 March 2011	POL-0219214 (July 2011) POL-0219218 (August 2011)	Please see our comments above at paragraph 5.1 in relation to the requirement for Post Office to provide disclosure of all versions of this document.