

**From:** "Defence Legal (Chris Jay)" [GRO]  
**To:** Rodric Williams [GRO], "Parsons, Andrew"  
[GRO]  
**Cc:** Newsome Pete [GRO] Mark Underwood1  
[GRO]  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD  
**Date:** Fri, 30 Jun 2017 15:57:04 +0000  
**Attachments:** 170630\_POL\_Bramble\_\_Legally\_Privileged\_SVMSDMINR3404\_-\_v1.0.pdf  
**Embedded:** unnamed  
**Inline-Images:** image010.png; image011.png; image012.png; image013.png; image014.png;  
image008.png; image015.png; image016.png; image017.png

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Andrew and Rodric,

PSB our answers to your questions:-

*A. Your email of 29 June at 9:46:-*

Re Horizon - whether POL will have had access to line by line data since 1999

FJ : Technical documentation from the archives show that the Horizon system transferred line by line transactional data from the outset – so prior to 1999. The earliest soft copy document that we can find is dated March 1997.

How many days data is available to the branch

FJ :The detailed information (per transaction) is available to the branch for 4 days.

This is summarised into reporting tables and the data at this summarised level is available for 62 days.

A different cut of summarised data which is provided to allow Sub-Postmasters to understand their remuneration is available for 84 days.

FJ to confirm when the data was first extracted from Horizon and supplied to Post Office regardless of the system Post Office used (a) to interpret this data and (b) make it available to their employees to support branch accounting FJ: Horizon went live in 1996 and data was extracted and sent to Post Office from the outset.

Whether FJ could change data in the Audit store prior to the Eternus hardware protection being implemented

FJ: The previous hardware was provided by Centera. All access to the data held on the Centera was via APIs provided by hardware supplier. The APIs did not support updates (i.e. changing data) but deletion was supported. (note that it would theoretically have been possible to delete data and then insert some new data to fill the gap which has the same effect as changing data).

Re Pleading 21 - FJ to provide a Summary of what the HORIZON/HNG-X Contract "does". Also to confirm that BT/ other telecoms suppliers supplied lines prior to 2010? To follow

Pleading 23 "Known Error" log . Yes FJ kept one but this not material to the Branch Accounting. FJ to confirm. FJ - As of 25th June 2017 there were no Known Errors in the Knowledge database relating to either the Core Audit Process or issues with branch accounts. Examples are in the email attached.

Pleading 25 - FJ not agent of Post Office. Confirmed. FJ has acted at all times as a contractor supplying goods and services to Post Office on an arms - length basis under its contract dated 28 July 1999 and has never

assumed or purported to assume the role of an agent of Post Office

**B Your email of 29 June at 15:26:-**

whether FJ was responsible for the phone lines (rather than POL or the SPMR) and did this change over time?; FJ - Where the network connection is/was ISDN these are entirely provided by Fujitsu (and our suppliers). However upon migration of most branches to broadband (which occurred generally before HNG-X application rollout) then the Post Office (or individual Post Master) provided the PSTN lines and Fujitsu (and our suppliers) overlaid the ADSL service.

The only exception to this is the Kingston Telecoms broadband branches in Hull where Fujitsu (and our suppliers) provide both the PSTN lines and ADSL service.

in relation to the recent barcoding issue on parcels, how was this error detected and what fix(es) were implemented; and

FJ - the Fujitsu component is included in the document attached. Martin Godbold of Post Office is in the process of producing the Post Office components from FSC and NBSC to complete the case study.

the controls which are in place to ensure that the audit trail is secure. FJ - We have explained the controls at length to Deloitte.

I trust that above answers your questions satisfactorily. I will get back to you on the one outstanding issues early next week.

Kind regards,

Chris

Christopher Jay, Senior Counsel

FUJITSU

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**From:** Rodric Williams [mailto:**Sent:** 29 June 2017 15:26  
**To:** Defence Legal (Chris Jay)  
**Cc:** Newsome Pete ; Mark Underwood1 ; Parsons, Andrew  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Chris,



Thank you for your email below, and especially for attending the meeting last week, where the input from Fujitsu was much appreciated.

In addition to the below actions, please could you also provide some further information on:

whether FJ was responsible for the phone lines (rather than POL or the SPMR) and did this change over time?; FJ - Where the network connection is/was ISDN these are entirely provided by Fujitsu (and our suppliers). However upon migration of most branches to broadband (which occurred generally before HNG-X application rollout) then the Post Office (or individual Post Master) provided the PSTN lines and Fujitsu (and our suppliers) overlaid the ADSL service.

The only exception to this is the Kingston Telecoms broadband branches in Hull where Fujitsu (and our suppliers) provide both the PSTN lines and ADSL service.

in relation to the recent barcoding issue on parcels, how was this error detected and what fix(es) were implemented; and

the controls which are in place to ensure that the audit trail is secure.

It is likely that further discrete points will crop up as we finalise the Defence. Given the tight timelines we are now working to, are you happy for Andy Parsons (Partner, Bond Dickinson; cc'ed) whom you met last week to contact you directly if/when the need arises? That would speed things up while still keeping the exchanges between our companies at a solicitor-to-solicitor level for privilege purposes.

With thanks for your continued support,

Rodric

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**From:** Defence Legal (Chris Jay) [[mailto:](#) **GRO**]  
**Sent:** 29 June 2017 09:46  
**To:** Rodric Williams **GRO**  
**Cc:** Newsome Pete <**GRO**> Mark Underwood1  
**Subject:** RE: Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Rodric,

Good to meet up last Thursday with Tony Robinson and the Bond Dickinson team in 1 Essex Court, and apologies for the slight delay in getting back to you but I was at our annual Legal & Commercial Conference the first 2 days of this week.

We took away a few actions from our meeting, which I have listed below.

Re Horizon - whether POL will have had access to line by line data since 1999

How many days data is available to the branch

FJ to confirm when the data was first extracted from Horizon and supplied to Post Office regardless of the system Post Office used (a) to interpret this data and (b) make it available to their employees to support branch accounting

Whether FJ could change data in the Audit store prior to the Eternus hardware protection being implemented

Re Pleading 21 - FJ to provide a Summary of what the HORIZON/HNG-X Contract "does". Also to confirm that BT/ other telecoms suppliers supplied lines prior to 2010?

Pleading 23 "Known Error" log . Yes FJ kept one but this not material to the Branch Accounting. FJ to confirm

Pleading 25 - FJ not agent of Post Office

No doubt you will let us know if this list is inaccurate or incomplete from your perspective.

In the meantime we will crack on and get you our responses, which we will aim to get to you by mid next week.

Just a gentle reminder re Legal Privilege. Our colleague Torstein and your Mark have been exchanging emails direct instead of through you and me. I have raised this internally with Pete and Torstein and reminded them of the protocol.

Kind regards,

Chris

Christopher Jay, Senior Counsel

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**From:** Rodric Williams [[mailto:\[GRO\]](mailto:[GRO])]  
**Sent:** 12 June 2017 18:21  
**To:** Defence Legal (Chris Jay) <[GRO]>  
**Cc:** Newsome Pete [GRO]; Mark Underwood1 [GRO]  
**Subject:** Post Office/Horizon- SUBJECT TO PRIVILEGE - DO NOT FORWARD

Chris,

I hope this finds you well. I have now received the NDA executed by Post Office, and attach it for execution by Fujitsu.

I also attach for your information the Generic Particulars of Claim filed in the Group litigation (without Appendices, which are available on request). There are a number of sections of the GPoC which our leading counsel Tony Robinson QC would like to discuss with Fujitsu in order to plead Post Office's defence. These sections have been extracted into the Word document attached. For ease of reference, I also attach "Schedule 6" of our Letter of Response referred to in Section 24 of the GPoC (a draft of which was provided to Fujitsu for comment before sending to Freeths).

I would be grateful if you could please let me know if and when the appropriate people from Fujitsu would be available to discuss these sections with us. As ever, please feel free to give me a call if this is something easier to discuss over the telephone.



With thanks and kind regards,

Rodric



**Rodric Williams**  
Head of Legal - Dispute Resolution & Brand

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