

FUJITSU SERVICES POST OFFICE ACCOUNT**Response to J. Coyne email dated 3rd March 2004****Background**

Jason Coyne has responded to the letter we sent to Post Office dated 20th February 2004 in response to his Expert Report dated 20th January 2004. Essentially he has not accepted any of our explanations and has refused to change the original opinion expressed in his report.

The solicitors have advised Post Office that the matter will now be committed to trial and that Post Office witnesses may be called. Post Office have in turn notified Post Office Account that we may have to provide expert witness to testify against his opinions.

I have spoken to Jim Cruise (Post Office Case Manager) and we both feel that there is probably another opportunity to influence Jason Coyne's opinion by inviting him to Bracknell and providing him with access to data, records and people who can deal with his observations directly.

Detail Response

Using the headings as presented in his report :

Horizon System Helpdesk

I do not agree with his assertion since he has made claims about Fujitsu only dealing with symptoms and not causes. The objective of the HSH is to return the Outlet to normal business as rapidly as possible and as a consequence the advice to reboot is the most effective way of doing this. He cannot dismiss the explanation in this way as he has expressed a negative opinion on the modus operandi.

Transaction Handling on Reboot

What was offered in our reply was a statement of fact. We can, if allowed, demonstrate that this happens but it would be for another Outlet and not Cleveleys in 2000 since, as Jason Coyne correctly points out, the supporting audit data has been deleted through normal operating procedures.

Reasonableness of Calls

Data that is provided to Post Office in support of investigations and prosecutions is derived from a controlled audit archive. HSH data from this source would indicate the numbers of calls raised but not their content or final disposition. Under the contract this data would be deleted 18 months after it was originally written.

However, the original HSH call Powerhelp transcript is maintained in an uncontrolled (in the sense of evidentially admissible) archive and this is available for access by the Expert if he so wishes it. From this archive he can obtain details of calls made by similar profiled Outlets at the same time and draw his own conclusions as to whether Cleveleys was unusual or not.

Similarly, the raw data for the analysis provided in our reply was derived from an uncontrolled database. Again, the Expert can have access to this database, at our Bracknell office, and can draw his own analysis of the available data.

With regard to his specific comparisons of mean numbers I can only say that he has selectively identified those that show Cleveleys in a poor light. Taking all 12 call codes there are 6 where Cleveleys do display a higher number of calls than the mean. By the same token there are 6 where it does not.

Operator advice to Reboot

It will not be possible to provide the 'crashdumps' that the Expert refers to since these will have been destroyed. Again, we are more than happy to invite Jason to the Horizon System Helpdesk in Stevenage where he can talk to the relevant people and follow the support line from 1st to 4th line. Since we cannot provide the absolute evidence relating to Cleveleys in 2000 we can at least assure him of the support and problem resolution activity that goes on behind what could be construed as a simplistic 'reboot and continue' piece of advice.

Defective Equipment

We would need to understand the basis for the opinion but as stated in our original response the statement is subjective and not supported by evidence.

Worrying Discrepancies

Need to discuss further.