

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

**Re: Seema Misra**

**Addendum to Technical expert's report to the Court prepared by  
Charles Alastair McLachlan, a Director of Amsphere Consulting  
Ltd.**

90 Fenchurch Street  
London EC3M 4BY  
England

*This report contains 8 pages*

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

## **1 Table of Contents**

<b>1</b>	<b>TABLE OF CONTENTS.....</b>	<b>1</b>
<b>2</b>	<b>INTRODUCTION.....</b>	<b>2</b>
<b>3</b>	<b>Detailed Comments.....</b>	<b>3</b>

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

## **2 Introduction**

On 3:30pm on Sunday 10<sup>th</sup> October 2010, I had the first opportunity to consider the witness statement of Gareth Jenkins dated 8<sup>th</sup> October served by e-mail on Friday 8<sup>th</sup> October to defence counsel after 4pm.

Much of the document reflects the points of difference recorded in my final report v1.0 at Section 4. However, there are new points that are introduced and some points which are worthy of particular comment and this brief addendum seeks to address these. For easy of reference I have referred to the page numbers in Jenkins' witness statement and the section numbers in my Final Report v1.0.

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

### 3 Detailed Comments

- 3.1 Page 4: Jenkins refers to the fact that he would not expect the state of the system to change between postmasters. It should be noted that we asked for data for periods extending from both before and after Misra's tenure as well as during her tenure. Post Office Limited have not made this data available to us.
- 3.2 On Page 5 Jenkins seeks to address my hypotheses at 1.2. He correctly identifies them as hypotheses rather than proven facts. However, he misunderstands the logical flow of identifying relevant hypotheses, gathering information that will inform these hypotheses, testing the hypotheses and then drawing conclusions. Thus he conflates the relevance of the hypotheses with his view that there is a lack of evidence to support them. In my opinion, these hypotheses are relevant because should they be true then they provide an alternative explanation to theft at West Byfleet. The lack of evidence that Jenkins refers to is addressed in my report.
- 3.3 On page 6 Jenkins seeks to address concerns about the User Interface (the Human Computer Interface or HCI). Two points:
- 3.3.1 The fact that there are documents that demonstrate an **intention** to use certain HCI design principles is not proof that these HCI design principles were **relevant**, properly **implemented** or when **tested** found to be **effective**. We would wish to engage an HCI design expert to comment on the relevance of the design principles to the context of the application and quality of implementation.

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

- 3.3.2 This is the first time we have had sight of these documents despite requests for the user manual, operations manual and training manuals more than 12 months ago. I have been shown the witness statement of Mrs Nixon from Highcliffe in which she discusses her concerns as to the errors that can be introduced by the user interface design. We have asked for access to test environments to conduct a user interface audit. We have asked for access to an operational system experiencing problems to establish whether the user interface is a cause of these problems. The Post Office has not permitted either of these two activities.
- 3.4 On page 13 Jenkins asks copmplaints of lack of evidence and asks for an example of how the failure of screen calibration could give rise to a discrepancy. The nature of the problem means that the system would not show it. If I press £100 and only collect £10 then I am £90 down but the system doesn't know. If this is a bill payment (e.g. rent, utility bill) then the balancing transaction may or may not be reconciled in a manner that will reveal the error – it has not been possible to explore the full set of products to understand which case applies.
- 3.5 On page 13 Jenkins quotes and agrees with my statement “Poor user interface design can contribute to poor data entry quality and user errors.” He then continues “However Professor McLachlan makes no attempt to explain in what way the Horizon User Interface design is ‘Poor’.” As explained above, we have had no opportunity to test or observe the operation of the user interface in the manner we have requested and this has limited our abiity to identify specific examples. However, my report does continue by citing two specific user interface problems – screen calibration and the ‘Fast Cash’ button as examples.

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

- 3.6 On page 17 Jenkins confirms that the Post Office choose not to report on the variance check discrepancies which he believes would have led the sub post master to investigate what is going on.
- 3.7 On page 18 Jenkins states that he has examined the data for West Byfleet for the whole of Misra's tenure to include the period in which he says the Calendar Square issue had not been fixed. Lee Castleton, a claimant against the Post Office in another matter, has provided me with evidence suggesting an alternative explanation to that provided by Jenkins. In order to offer an opinion as to the merits of Jenkins' explanation it would be necessary to have disclosure of the archive materials to which he refers and the data for the relevant period.
- 3.8 On Page 21 Jenkins does not recall the discussion we had re: travellers cheques when I attended his office. My handwritten notes made at the time do include reference to travellers cheques. I have not had access to a system to explicitly check out the scenario in the manner that Jenkins has. Indeed, Jenkins does not contest my record of his statement in my report at 4.14 where he explains that all the test environments have been de-commissioned. I am therefore puzzled as to how he was able to conduct his investigation on a version of the system relevant to the Misra case.
- 3.9 On Page 24 Jenkins narrows the consideration of the Transaction Corrections to those he believes are relevant. Whatever the merits of our different approaches Jenkins is unable to deal with the problem that there may have been Transaction Corrections that should have been made but which were not offered. I would not expect to find evidence of missing transactions: we can't find them if they are missing.

Amsphere

*Confidential and Privileged*  
*On instruction of Coomber Rich Solicitors*  
*Yard House, Basingstoke, RG21 7NX*

3.10 On page 27 Jenkins claims there is no explanation for the basis on which the appendices were prepared. In fact, I sent him the full working set of working papers including spreadsheets and an Access database and invited him to raise any questions he might have as to methodology immediately after our discussions on 1st October. He acknowledge receipt of these files but did not raise any questions.

3.11 On page 29 Jenkins provides an Analysis of the Cash at branch. This is the first time I have had sight of this investigation. Jenkins has not provided me with the working papers or summary data by which I might test his findings. I am therefore unable to offer an opinion as to the accuracy of his findings

Charles McLachlan

Monday 11<sup>th</sup> October 2010