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**EXPERTS REQUESTS FOR INFORMATION**

**PREPARED IN ACCORDANCE WITH PARAGRAPH 9 OF THE FIFTH CMC ORDER**

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This document follows communications between the two experts to establish agreement as to what information is needed by both experts.

**Comment from Mr Coyne**

Each of my requests is made in relation to the agreed 'Horizon Issues' and, where appropriate, with reference to material already disclosed using the agreed disclosure reference numbers.

**Comments from Dr Worden**

My general position is that I do not have any requests for information at this stage because my current requirements for information are being met by the 110,000 documents that have been provided to the experts.

My view is that many of Mr Coyne's requests can be satisfied, at least in the first instance, by asking Fujitsu to point him towards the appropriate documents within those 110,000.

My own preference is to develop my understanding by reading some documents which will enable me to ask the right focused questions, if necessary, after that.

It should also be noted that my focus and priorities are not necessarily aligned with Mr Coyne's at this stage and the requests made by Mr Coyne suggest that this is the case. Although I do not support requests that relate to lines of enquiry that I am not pursuing at this stage that does not mean that I oppose all of Mr Coyne's requests if he can show that they align with the Horizon Issues and his lines of enquiry.

**In relation to Issue 1:**

- 1.1 [RFI 1.1] Please describe how a Subpostmaster ("SPM") reports an issue (detailed from the moment that SPM picks up the phone), how this is recorded and how this is investigated (throughout the various 1st, 2nd and 3rd lines of support).
  - a. If a Peak/bug is ultimately determined, how is the impact considered and what is the process of scheduling this into the development cycle and then ultimately how is this recorded in the code versioning system?

- b. When and how are changes agreed through to release management, including the release notes for new versions and which persons these are shared amongst?
- c. Is there a consolidated complete release/version chronology available for Horizon/Horizon Online with accompanying Release Notes at final version?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>Post Office understands the word "issue" to mean a bug in Horizon. If this request intends the word "issue" to have a wider meaning then the scope of this request goes beyond the Horizon Issues and is not agreed.</p> <p>The means by which a SPM may report an issue to Post Office will be known to the Claimants and so Mr Coyne can obtain this information from his own clients.</p> <p>The processes for how Post Office and Fujitsu record issues and how they are investigated through the various lines of support should be located in documents and Post Office will ask Fujitsu to provide document references.</p> <p>1.1(a) and 1.1(b) should be limited to bugs that could potentially create discrepancies in branch accounts. Subject to that point, the answers to 1.1(a) and 1.1(b) requests should be located in documents.</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – I do not believe this request is out of scope since Issue 1 concerns how bugs, ERRORS or defects have the potential to cause apparent or alleged shortfalls relating to Subpostmasters' branch accounts or transactions.</p> <p>For Post Office to stipulate that 'issue' refers to bug alone is unreasonable as an SPM would not know if an error they encountered was in fact a bug.</p> <p>Part 1.1c new request.</p>

1.2 [RFI 1.2] Please describe how bugs/errors/defects identified by Fujitsu Services ("FJ") or the Post Office ("PO") are processed if it is the case that this is a different mechanism to those identified through an SPM issue.

## a. What are "offline KELs"?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	<p>Post Office's position is that the process is broadly the same regardless of whether an issue is identified by FJ, PO or an SPM.</p> <p>No further documents or information are required to comply with this request by beyond that provided in response to request 1.1.</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – "broadly the same" is not 'exactly the same', therefore the request stands. I do not believe the processes employed would be the same. For example, it is not envisaged that a Post Office back office employee who might note an error would telephone the same helpline as an SPM would.</p> <p>Part 1.2a new request.</p>

- 1.3 [RFI 1.3] In relation to POL-0032853, is there further documentation that might detail any specific branches that were affected?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>This is a factual question that would require Post Office to carry out a satellite disclosure exercise. It should also be noted that POL-0032853 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne.</p> <p>A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.</p> <p>It also appears to be an attempt to obtain documents containing information that could potentially be tied to individual cases. That is not the purpose of the Horizon Issues trial.</p>	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid.

- 1.4 [RFI 1.4] Regarding POL-0032932.doc, what is the purpose of setting an NB102 exception to F99 by FJ?
- How often has this occurred?
  - What is the cause of an 'Uncleared Transaction Corruptions' and how often do these occur?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>Post Office will ask Fujitsu to explain the purpose of setting an NB102 exception to F99. 1.4(a) is a factual question and Post Office would need to interrogate the whole of its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – Satisfied that Fujitsu will be asked to explain the cause, awaiting further information.</p> <p>With regard to "how often"; this is a valid request. If it is answered for example <i>this is an</i></p>

	<p>particular purpose. It should also be noted that POL-0032932 is a Fujitsu document (and one of the 100 technical documents provided to Mr Coyne). A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.</p> <p>1.4(b) Post Office will ask Fujitsu to explain the cause of 'Uncleared Transaction Corruptions'. However, "and how often do these occur" is a factual question and the response to 1.4(a) is repeated.</p>		<p><i>isolated incident that impacted one transaction in 2003, a different inference can be gained than if the answer given is 10,000 transactions each day for the last ten years.</i></p>
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1.5 [RFI 1.5] Regarding POL-0032919.pdf, the GoldenGate replication between Oracle 10g and 11g being aborted and resulting in a number of branches reporting cash declaration and stock reporting discrepancies, were any transaction corrections sent to the 247 affected branches as a result of the discrepancies and which branches were affected by the incident?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	<p>The relevance of this request is not understood.</p> <p>Transaction Corrections are issued by Post Office to correct transient discrepancies in branch accounts in order to restore the correct position.</p> <p>It also appears to be an attempt to obtain documents containing information that could potentially be tied to individual cases. That is not the purpose of the Horizon Issues trial.</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – This request is required to effectively answer part (b) of Issue 1 which is to understand whether Horizon did accurately process and record transactions.</p> <p>The response is required to understand full circle whether information was sufficiently collected in the event of an error, to fix it. Therefore, where branch accounts were affected, could and were they identified and was</p>

			a correcting transaction issued to rectify the error.
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1.6 [RFI 1.6] With regard to POL-0032901:

- a. Please provide how many times (and over what period) "Software faults affecting reconciliation and settlement" have been reported?
- b. Please provide how many times (and over what period) "End-to-End APS reconciliations differences" have been reported?
- c. Please provide how many times (and over what period) "Reconciliation Errors" have been reported and if these lead to "APS Business Incidents"?
- d. Please provide how many times (and over what period) "BIM reports" are produced?
- e. Please provide how many times (and over what period) the "Problem Management Process" has recorded the potential for a system or software error?
- f. Please provide how many times (and over what period) PO has been notified of a "widespread error" - as determined by this document?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>POL-0032901 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne.</p> <p>A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.</p> <p>Further, these are factual questions and Post Office would need to interrogate the whole of its business to</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – request still valid.</p> <p>With regard to "how many times and over what period"; If it is answered for example <i>this is an isolated incident that impacted one transaction in 2003</i>, a different inference can be gained than if the answer given is <i>10,000 transactions each day for the last ten years</i>.</p>



	attempt to answer them because the information is very unlikely to have been pooled or collated for this particular purpose.		
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1.7 [RFI 1.7] In relation to POL-0032864.doc "Data Errors / Not Data Errors":

- a. Please describe what "work-arounds" have previously been agreed between PO and FJ in accordance with page 6 where "...inaccuracy or error was not capable of being corrected by the User before irrevocable commitment of the cash account in question..."
- b. How many (and over what period) were "Inaccurate Cash Account (Data Errors) recorded" and how many (and over what period) were "Manual Error Reports" issued?
- c. How many (and over what period) were "Repaired Cash Accounts" or "Repaired Transaction Data" identified? For each, please provide the Classification type at para 3.6.2 of document POL-0032864.
- d. How many times has FJ notified PO of "Widespread errors" as defined at 3.6.4 of document POL-0032864?
- e. The document refers to "Preventative code" - How many times (and over what period) has such code been deployed?
- f. How many times (and over what period) have FJ provided reports to PO in line with para 3.6.6.1, 3.6.5.3, 3.6.5.1, 3.6.5.2, 3.6.7?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	Post Office understands that Fujitsu should be able to answer information request 1.7(a) and Post Office will ask Fujitsu to do so.  Requests 1.7(b). - (f) are factual questions and Post Office would need to interrogate the whole of its business to attempt to answer	Dr Worden declines this as a joint request.	Jason Coyne – Awaiting further information in respect of Fujitsu providing a response to information request 1.7(a).  1.7(b) – (f) still required.  With regard to "how many times and over what period"; If it is



	<p>them because the information is very unlikely to have been pooled or collated for any particular purpose. It should also be noted that POL-0032864 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne.</p> <p>A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.</p>		<p>answered for example <i>this is an isolated incident that impacted one transaction in 2003</i>, a different inference can be gained than if the answer given is <i>10,000 transactions each day for the last ten years</i>.</p>
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- 1.8 [RFI 1.8] Please describe in reference to the above document at page 20 what the effects are if the data is not transmitted within five working days?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Dr Worden declines this as a joint request.	Jason Coyne – Awaiting further information pending Fujitsu's response.

- 1.9 [RFI 1.9] Please provide access to the Peak system(s) for inspection with the capability to extract specific requested bugs/issues/peaks from the system(s) for later review.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Agreed pursuant to terms of the draft Order.	Dr Worden declines this as a joint request.	One day agreed at present, second day to be arranged.

- 1.10 [RFI 1.10] - In relation to the letter from Post Office dated 23 May 2016 to Mr C E Burke and the failure of a transaction to recover once the

system was restored. Can Post Office please provide further information on:

- a. Why the transaction once found, was recorded as a Lloyds transaction and not TSB;
- b. What was the reason or cause (if it has been found) as to why the restore process in Horizon Online did not effectively recover the transaction(s); and
- c. Have there been or are there any other known occurrences where the restore process has failed to recover transactions and/or attributed the wrong information (i.e., incorrect financial institution).

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	N/A	Dr Worden declines this as a joint request.	New Request.

1.11 [RFI 1.11] - How many times (and over what period) has the PO "Fraud Analysis Team" reported that a "technical" or "Integrity" and/or "Horizon issue" has been identified?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	N/A	Dr Worden declines this as a joint request.	New Request.

- 1.12 [RFI 1.12] POL-0118364 refers to reference data being modified as result of the "Live Peak fix" - how many times has a Live Peak fix to reference data been made?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.		Dr Worden declines this as a joint request.	New Request.

**In relation to Issue 2:**

- 1.13 [RFI 2.1] Please describe how SPMs receive reports of active bugs or errors regarding the Horizon system. For example, were SPMs notified about the "Local Suspense Account" problem, or "Receipts and Payments mismatch" issues (and any other known issue within Horizon)? If so, how?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>Post Office will seek to answer the specific example "Local Suspense Account" problem, or "Receipts and Payments mismatch" issues by 4:00pm on 14 August 2018.</p> <p>The broader "any other known issue with Horizon" would require Post Office to carry out a satellite disclosure exercise and, in any event, it is clearly a fishing expedition.</p>	Dr Worden declines this as a joint request.	Jason Coyne – The request is intended to inform the answer to Issue 2 and whether Subpostmasters were alerted to bugs, errors or defects within the Horizon system.

- 1.14 [RFI 2.2] Is there a list of error codes that Horizon has (or that FJ apply) to identify when an error/issue has occurred and the potential branch account impact?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands from Fujitsu that there is no such list of error codes but have agreed to endeavour to translate specific codes upon request.	Dr Worden declines this as a joint request.	Jason Coyne – Please see document 180622ECR1935 00-03.doc

**In relation to Issue 3:**

- 1.15 [RFI 3.1] If it is the case that reports such as NB102 recorded reconciliation exceptions, what information within this report records the cause of such exceptions?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office will ask Fujitsu to answer this question.	Dr Worden declines this as a joint request.	Jason Coyne – response satisfactory, awaiting further information from Fujitsu.

## 1.16 [RFI 3.2] With regard to POL-0032855:

- a. Para 1.0 - when was the "totally manual" "Error notice functionality" replaced by this process?
- b. The document records that "the central accounting function decides that it is necessary to make some adjustment to the Branch Accounts" - how is this decision made?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	<p>(a). Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.</p> <p>(b). This request is outside of the scope of the Horizon Issues as it relates to a reconciliation process that takes place outside of Horizon.</p>	Dr Worden declines this as a joint request.	Jason Coyne – part (a) response satisfactory, in relation to part (b), I do not consider this to be outside of the scope since adjusting the branch accounts, thereby impacts the Subpostmaster and the BRDB which is inside the boundary of Horizon. Response still required.

**In relation to Issue 4:**

## 1.17 [RFI 4.1] Regarding the acknowledgement that the Horizon system is not perfect and there has been deployment of technical controls to reduce errors, please describe:

- a. What these technical controls are (referred to in Defence paragraph 16);
- b. For what reasons have these technical controls been triggered; and
- c. How have the errors been dealt with?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	As a general point, it should be noted that documents containing this information have been disclosed to Mr Coyne and Fujitsu have delivered an introductory briefing on the architecture of	Dr Worden declines this as a joint request.	Jason Coyne – (a) and (b) response satisfactory, part (c) response still required (wording amended).

	<p>the Horizon system to Mr Coyne pursuant to paragraph 6(b) of the Third CMC Order.</p> <p>(a) and-(b) Post Office understands that the answer to these requests should be located in document(s) and Post Office will ask Fujitsu to provide document references.</p> <p>(c) Is not understood.</p>		
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1.18 [RFI 4.2] In relation to POL-0032913, can more information be provided on the "backlog of discrepancies" held by FJ?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

1.19 [RFI 4.3] Please describe what situation led to the process outlined in POL-0032939.doc (TPS – EPOSS Reconciliation TIP Transaction Repair) and how many transactions have been repaired?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	<p>Post Office understands that Fujitsu should be able to explain what situation led to the process outlined in POL-0032939 (TPS – EPOSS Reconciliation TIP Transaction Repair) and Post Office will ask Fujitsu to do so.</p> <p>The request for Post Office to describe how many transactions have been repaired is a factual question and Post Office would need to interrogate the whole of its business to attempt to answer them because the information is very unlikely to have been</p>	Dr Worden declines this as a joint request.	<p>Jason Coyne – I do not believe the reporting elements of how many transactions have been repaired have been disclosed or are likely to be found in a technical document therefore the request still stands.</p> <p>With regard to "how many"; this is a valid request. If it is answered for example <i>this is an isolated incident that impacted one transaction in 2003, a</i></p>



	<p>pooled or collated for this particular purpose.</p> <p>It should also be noted that POL-0032939 is a Fujitsu document and one of the 100 technical documents provided to Mr Coyne. A further 110,000 such documents have now been disclosed to Mr Coyne and Post Office is in no better position than Mr Coyne or his clients' instructing solicitors to search those documents.</p>		<p>different inference can be gained than if the answer given is <i>10,000 transactions each day for the last ten years.</i></p>
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**In relation to Issue 5:**

1.20 [RFI 5.1] Please provide a list of all data sources outside of Horizon of which a comparison with data inside Horizon is required.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
<p>Jason Coyne.</p>	<p>This is not within scope of Issue 5, which is how Horizon itself compares transaction data recorded by Horizon against transaction data from sources outside of Horizon.</p> <p>In any event, to answer this question Post Office would need to identify every external data source that feeds data into Horizon and then review those data feeds to see if there has ever been a discrepancy between any of them and any transaction recorded in any of 10,000+ branches within the Post Office network (presumably over an 18-year period) in order to then identify the data sources that have encountered a discrepancy.</p> <p>To give this a sense of scale, it is noted that Horizon processes around 6,000,000 transactions per day. The</p>	<p>Dr Worden declines this as a joint request.</p>	<p>Jason Coyne – Wording amended. Response still required. It is expected that this is a simple question to respond to as an up to date technical register should be available.</p>

	scale of this exercise would be enormous.		
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1.21 [RFI 5.2] Please describe what the process is following the discovery of a discrepancy between the two sources?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

1.22 [RFI 5.3] If report NB102 does not identify all causes of discrepancies between Horizon and transaction data sources outside of it, then what other reports or sources exist to identify those?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

1.23 [RFI 5.4] Once a discrepancy has been identified, what is the process for determining whether a TC or balancing transaction should be raised?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request relates to an accounting process that takes place outside of Horizon and it is therefore outside the scope of the Horizon Issues.	Dr Worden declines this as a joint request.	Jason Coyne – I do not agree this is outside of the scope since TCs and Balancing Transactions and/or adjustments would affect the Branch accounts which are

			inside the Horizon system.
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**In relation to Issue 6:**

1.24 [RFI 6.1] Please describe what system level logging and system events are considered when investigating shortfalls and Transaction Corrections in order to investigate cause.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	<p>Post Office understands that there will be documents which deal with system level logging and system events and Post Office will ask Fujitsu to provide document references.</p> <p>The phrase "when investigating shortfalls and Transaction Corrections in order to investigate cause" refers to the actions that Post Office might take to investigate a shortfall. This does not relate to Horizon and is outside the scope of the Horizon Issues.</p>	Dr Worden declines this as a joint request.	Jason Coyne – This request is valid in respect of providing an answer to part (v) of Issue 5 and the data stored in the central data centre not being an accurate record of transactions entered on branch terminals.

1.25 [RFI 6.2] Please describe how often JSN checks were performed in the investigation of a discrepancy/shortfall and what the results or records of differences are?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This does not relate to Horizon and is outside the scope of the Horizon Issues. Further, it is a factual question that would require Post Office to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or	Dr Worden declines this as a joint request.	Jason Coyne – This request is valid in respect of providing an answer to part (v) of Issue 5 and the data stored in the central data centre not being an accurate record of transactions entered on branch terminals.

	collated for this particular purpose.		
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1.26 [RFI 6.3] In relation to POL-0032915, are any technical bridge or service bridge meeting minutes (or similar documentation) available (page 31)?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office will undertake a reasonable and proportionate search for, and then give disclosure of, any technical bridge or service bridge meeting minutes related to POL-0032915. It does not agree to disclose "other documents" as this request is too wide and imprecise.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, however should these upon review prompt further questions, I shall request those at a later date.

1.27 [RFI 6.4] Regarding Correcting Accounts for \_lost\_ Discrepancies - G Jenkins.pdf, how was it ultimately decided if/how FJ should be "correcting the data"?

- a. "Of the cases so far identified there is one for £30,611.16, one for £4,826.00 and the rest are all less than £350" - are these losses or gains?
- b. How many FJ users are able to adjust the Opening Figures and BTS data?
- c. Is there an audit trail of a decision being made by POL to 'write off the "lost" discrepancy' and adjusting of the Discrepancy account to align the decision in POL SAP?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This does not relate to Horizon and is outside the scope of the Horizon Issues.	Dr Worden declines this as a joint request.	Jason Coyne – I disagree that this is outside of the scope. This request is valid in respect of providing an answer to part (v) of Issue 5 and the data

			stored in the central data centre not being an accurate record of transactions entered on branch terminals.
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1.28 [RFI 6.5] With regards to POL-0032936.doc, what is the definition of a "red event" and what were the consequences of a red event being raised silently with no direct feedback to the operator?

a. Further, how were these 'silent' red events identified?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	Post Office understands that Fujitsu should be able to answer these information requests and Post Office will ask Fujitsu to do so.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

1.29 [RFI 6.6] In respect of POL-0032912.docx, how many occurrences of a Peak initiator not being available *or* finding a suitable replacement nominee has led to a Peak not being discussed at the Business Impact Forum (BIF)/Peak Targeting Forum (PTF)?

a. How often do the forums meet? The document states they are to be held weekly each Monday at 11:00am - was this true in practice?

b. How many Emergency PTFs have occurred?

i. Further, what were the nature of these PTFs?

c. How are the Peaks to be discussed at the forum decided?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	The first part of this request ("how many occurrences of a Peak initiator not being available...") is a factual question and Post Office	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. Peaks are typically Errors/Bugs within Horizon and if

	<p>would need to interrogate its business to attempt to answer them because the information is very unlikely to have been pooled or collated for any particular purpose.</p> <p>Request 6.6(a) is unnecessary and is a request for evidence which is not appropriate.</p> <p>Request 6.6(b) factual question and Post Office would need to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for any particular purpose.</p> <p>Requests 6.6(c) and (d) are factual questions which go beyond the scope of Issue 6 towards specific cases, which is not the purpose of the Horizon Issues trial. Without prejudice to that point, Post Office understands that the answers to these questions should be found in documents and Post Office will ask Fujitsu to provide document references.</p>		<p>they are not dealt with appropriately may lead to impact branch accounts.</p> <p>d) removed.</p>
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- 1.30 [RFI 6.7] POL-0032859.doc page 6 states: *"Due to the potential dynamic nature of the Reconciliation Service, where there is the potential for new exception types to be generated as a result of software errors within new releases or reference data, it has been agreed that these procedures will be documented outside of the formal Reconciliation & Incident Management CCD document set."*
- a. How many "exception types" have been identified to present day.



<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This is a factual question and Post Office would need to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this particular purpose.	Dr Worden declines this as a joint request.	Jason Coyne – Request modified. Request valid as it deals with potential exceptions which result from software errors.

1.31 [RFI 6.8] With regard to POL-0032909:

- a. Please provide how many times (and over what period) a *"Reconciliation error is the result of some system fault"* that has been determined as a software or system fault.
- b. Please provide how many times (and over what period) there has been *"Evidence of a system fault [that has needed] some corrective action"*.
- c. Please provide how many times (and over what period) Business Incidents (as described at 3.3.1) are reported to *"Fujitsu Third Line Support (SSC) for any system fault of database adjustment"*
- d. Please provide how many times (and over what period) DBTN Incidents (as described at 3.3.1.3) are reported.
- e. Please provide how many times (and over what period) Type E03, E04, E05, E06, E07, E08, E09, E12, E13, E14, E21, E23, E25, E26, E29, E30 (as described at section) are reported.
- f. Please provide how many times (and over what period) APS Reconciliation Errors are displayed within the APSS2133 report.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	These are factual question and Post Office would need to interrogate its whole business to attempt to answer them because the information is very unlikely	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid, this request is for information about the frequency/duration of accepted Horizon system faults/errors.

	to have been pooled or collated for this particular purpose.		
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1.32—[RFI 6.9] In respect of acha2230K.html and surs913K.html, what are "B priority" and "P5 priority" calls?

a.—What is the difference between numerical and or alphabetical priority calls?

b.—Are there other incremental types such as P1, P2, P3... A priority, C priority etc?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	New Request.		New Request.

\*The above has been satisfied from the PEAK inspection observations.

**In relation to Issue 7:**

1.33 [RFI 7.1] When FJ access branch accounts to modify or insert data, is/was the purpose recorded?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	<p>Issue 7 concerns whether Post Office and/or Fujitsu were able to access transaction data remotely.</p> <p>Issue 10 concerns whether Post Office and/or Fujitsu were able to edit or delete transaction data and Issue 11 asks if they did, did Horizon have any permission controls upon the use of the facility/did it maintain a log of such actions and such permission controls.</p> <p>None of these issues involve factual investigations as to how</p>	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

	<p>many times these facilities were used, if any.</p> <p>Mr Coyne's requests in relation to Issue 7 are therefore treated as if they had been made under Issue 10 and/or 11.</p> <p>Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.</p>		
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1.34 [RFI 7.2] Please describe what privileges and capabilities Administrators had in relation to Branch remote access and the relevant processes and procedures?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

1.35 [RFI 7.3] Please describe how Transaction amendments (including reversals and balancing transactions) can be identified for those which were not carried out by the SPM in the audit/transaction data/logs (i.e., is it flagged in some specific way)?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

- 1.36 [RFI 7.4] POL-0032939.doc references a tool that allows transaction data to be modified outside of branch. Please describe how such modification was audited, and how the audit files are updated? Further, how often such a tool was used?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	Post Office understands that the answer to this request should be located in document(s) and Post Office will ask Fujitsu to provide document references, save that "how often such a tool was used" is a factual question that is outside the scope of Issues 7, 10 and 11.	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.  With regard to "how often"; this is a valid request. If it is answered for example <i>this is an isolated incident that impacted one transaction in 2003</i> , a different inference can be gained than if the answer given is <i>10,000 transactions each day for the last ten years</i> .

- 1.37 [RFI 7.5] In relation to 'Operations Manual version 7 December 2006 - pages 9-13.pdf' and specifically "*The introduction of the new Post Office Ltd Finance System (POLFS) in Product and Branch Accounting (PBA.) Chesterfield means that the finance teams can no longer adjust client accounts on site.*"

- a. Can it be described what "on site" means?
- b. Can it be described how the process worked before this 'change' and what it entails now?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	New Request.	Dr Worden declines this as a joint request.	

**In relation to Issue 8:**

- 1.38 [RFI 8.1] Please describe any reports received by PO management that displays the level of shortfalls or discrepancies arising from Horizon bugs/defects. Please provide copies of such reports.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This question is not understood and requires clarification.	Dr Worden declines this as a joint request.	Jason Coyne – wording amended, response still required.

- 1.39 [RFI 8.2] Please describe what dictates when BIM and MER reports are produced and how often BIF and PTF meetings were held and whether meeting minutes (or similar documentation) are available for those.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request is outside the scope of Issue 8, which asks "What transaction data and reporting functions were available through Horizon to Post Office for identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls in branches, including whether they were caused by bugs, errors and/or defects in the Horizon system".	Dr Worden declines this as a joint request.	Jason Coyne – I do not agree this is out of scope since both reports identify incidents and exceptions that had/have the potential to impact branch accounts which is within the scope of Horizon. Request still valid.

- 1.40 [RFI 8.3] In relation to POL-0032862.doc, what is the nature of the data error to be repaired as per section 3.4.3?
- What information is contained within in a "Business Incident"?
  - Is there a log of all "Business Incidents" and "System Incidents"?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
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<p>Jason Coyne.</p>	<p>Post Office understands that the answer to request 8.3(a) should be located in document(s) and Post Office will ask Fujitsu to provide document references.</p> <p>Request 8.3(b) is outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identifying the occurrence of alleged shortfalls and the causes of alleged shortfalls. Without prejudice to that point, Post Office understands that Fujitsu should be able to answer this information request and Post Office will ask Fujitsu to do so.</p>	<p>Dr Worden declines this as a joint request.</p>	<p>Jason Coyne – Request still valid. I understand that Business and System Incidents are the reporting functions that record occurrences and causes of shortfalls.</p>
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1.41 [RFI 8.4] With regards to POL-0032841.doc Network Banking Reconciliation and Incident Management Processes:

- a. How many times (and over what period) are incomplete state transactions noted?
- b. How often were comms/harvesting/ISDN/counter issues the cause of Network Banking system States 1, 2, 4, 5, 6, 7, 12, 13, 14, 15, E01, E02, E03, E04, E08, E09, E10, E11, E12 E13, E20, E21, E23, E26, E27, E28, E29, E30, E34, E35, E36, E37, E39:
  - i. After investigation when have PO/FJ had to perform a financial adjustment to rectify system states?
  - ii. Please provide copies of NB102 reports if they contain transactions that relate to relevant branch accounts.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
<p>Jason Coyne.</p>	<p>These requests are outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identifying the occurrence of alleged</p>	<p>Dr Worden declines this as a joint request.</p>	<p>Jason Coyne – This response would directly inform the answer to Issue 8.</p>



	<p>shortfalls and the causes of alleged shortfalls.</p> <p>In particular, request 8.4(b)(ii) asks for copies of reports that relate to "relevant branch accounts", which Post Office understands to mean the branch accounts of Claimants in this litigation. That is not within the scope of the Horizon Issues.</p>		
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1.42 [RFI 8.5] With regards to POL-0032902.doc 'On line services Reconciliation & Incident Management' - please provide a list of how many "On Line Services Business Incidents" have been recorded (times & dates).

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Request 8.5 is outside the scope of Issue 8 as it goes beyond identifying the data and reporting functions available to identify the occurrence of alleged shortfalls and the causes of alleged shortfalls.	Dr Worden declines this as a joint request.	Jason Coyne – I do not believe this is out of scope, the response would enable answer to Issue 8 and identifying whether these indicated shortfalls in branches.

1.43 [RFI 8.6] In respect of 'Horizon Data (status Draft) - the\_Helen Rose Report\_.pdf':

- a. Are there any other known incidents where it is suspected that a system crash occurred and subsequently "the clerk may not have been told exactly what to do." [Page 2-3]?
- b. What proportion of "underlying logs" [Page 3] and indeed what logs are consulted to confirm whether disputed reversals are confirmed as part of Recovery?
- c. To what does "Live Data" refer and how was this performed [Page 3]?

- d. Why was there "no evidence one way or the other" [Page 3] to identify whether a system reboot did occur? Is this typical?
- e. Is it suspected that utilising the "basic ARQ logs" for evidence in Court has previously resulted historically in "not giving a true picture." Further, what are the "extra reports" that should be acquired by the operational team?
- f. Can it be explained what is meant by the following statement "I know you are aware of all the horizon integrity issues..." [Page 3].
- g. Was the existing ARQ report enhanced to make it clear whether a Reversal Basket was generated by Recovery or not [Page 4]? Further, if so, when did this take effect?
- h. Is it suspected that events may have been "misinterpreted when giving evidence and using the same data for prosecutions." Has this been investigated?
- i. Can the transaction data and logs consulted and referenced in this report be provided for review to assist in interpretation of the full issues referred to in the document?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	New Request.	Dr Worden declines this as a joint request.	New Request.

### **In relation to Issue 9:**

- 1.44 [RFI 9.1] Please describe how often counter error logs were reviewed in the event of a reported issue and if they were available to the SPM for investigating issues?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Issue 9 asks "what transaction data and reporting functions (if any)	Dr Worden declines this as a joint request.	Jason Coyne – Response satisfactory, awaiting further information from Fujitsu.

	<p>were available through Horizon to [SPMs] for:</p> <p>a. identifying apparent or alleged discrepancies and shortfalls and/or the causes of the same; and b. accessing and identifying transactions recorded on Horizon. Post Office understands that the answer to the question "were counter error logs available to the SPM for investigating issues" should be located in document(s) and Post Office will ask Fujitsu to provide document references. However, the remainder of this request is outside the scope of Issue 9 as it goes beyond identifying the data and reporting functions available to identifying</p> <p>the occurrence of alleged shortfalls and the causes of alleged shortfalls.</p>		
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1.45 [RFI 9.2] Please describe if Discrepancy Reports have ever been provided to SPMs and if so, what was their purpose, what replaced them and when? Further, what receipts were SPMs advised NOT to be retained?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request should be answered by Mr Coyne making enquiries of the Claimants, particularly the question "what receipts were SPMs advised NOT to be retained?" as this appears to be an allegation made by one of the Claimants (Mr Coyne does not refer to a document as the source of his question).	Dr Worden declines this as a joint request.	Jason Coyne – It is Post Office who are best aware of the agreed process and procedural documentation, this is a request simply asking for guidance on where it might be discovered. Request still valid.  Second Sight reported that there are transaction types where receipts are not to be retained.

- 1.46 [RFI 9.3] With regards to POL-0032836.doc 'EPOSS End-to-end Reconciliation Process For Release NR2 - Incident Management & Resolution':
- Please provide how many (and over what period) "EPOSS reconciliation incidents" and "OBCS business incidents" have occurred.
  - How many times (and over what period) were "*Hardware, comm. and software incidents associated with the counter systems reported to post office*"?
  - Also, please provide a description of the class of documents (if any) which record that data has been modified (and/or transactions inserted) in Horizon in circumstances that may impact a branch's account or transactional information.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request is outside the scope of Issue 9 (which asks what data and reporting functions were available, not how many times were they used).  Further, this request would require Post Office to interrogate its business to attempt to answer it because the information is very unlikely to have been pooled or collated for this particular purpose.	Dr Worden declines this as a joint request.	Jason Coye – This is not considered out of scope in respect that it is a request about reports and/or data events wholly relevant to Issue 9. Response still required.

**In relation to Issue 10:**

- 1.47 [RFI 10.1] Please explain why branch account transaction rebuilds took place and if so, what is the process of informing the SPM or PO?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
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Jason Coyne.	Post Office understands that the answer to request 8.3(a) should be located in document(s) and Post Office will ask Fujitsu to provide document references.	Dr Worden declines this as a joint request.	Jason Coyne – The current PO response to this question is not relevant to RFI 10.1, response still required.
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1.48 [RFI 10.2] With regard to POL-0032866.doc please set out how many times (and over what period) the "Host BRDB Transaction Correction Tool" has been used. Further, we understand that process BRDBC033 provides an audit for this tool - please confirm?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	This is a factual question that is outside the scope of Issue 10 (which asks whether Post Office and/or Fujitsu had certain abilities, not how many times they were used).	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. This goes directly to the modification of data.  With regard to "how many times"; this is a valid request. If it is answered for example <i>this is an isolated incident that impacted one transaction in 2003</i> , a different inference can be gained than if the answer given is <i>10,000 transactions each day for the last ten years</i> .

#### In relation to Issue 11:

1.49 [RFI 11.1] For the One Balancing Transaction that PO are aware of (Defence 57(3)) please describe how the SPM was made aware?

Requested By	PO Response to Initial Request	Joint Request Position	Response to PO Response
Jason Coyne.	This request is beyond the scope of Issue 11 (which asks what permission controls and logging systems were in place within Horizon in relation to	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. This request relates directly to what permission controls are in place prior to modification of data.

	any facility to edit, delete, etc. data from Horizon).		
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1.50 [RFI 11.2] Please describe whether the Post Office or FJ have any record of any account discrepancy known to NOT be caused by a human operator.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This question is not understood. It is not understood what is meant by "events". It is not understood who is said to have "reported" such and to whom.	Dr Worden declines this as a joint request.	Jason Coyne – wording amended response still required.

1.51 [RFI 11.3] Please describe what would determine whether a branch was informed or not of FJ carrying out a modification/addition to branch data.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request is beyond the scope of Issue 11 (which asks what permission controls and logging systems were in place within Horizon in relation to any facility to edit, delete, etc. data from Horizon).	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. This point goes directly to whether permission was granted to remotely modify branch data.

1.52 [RFI 11.4] Please describe under what circumstances branches were told to pause usage of any equipment whilst remote actions occurred.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request is beyond the scope of Issue 11 (which asks what permission controls and logging systems were in place	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. The "pause usage" is directly related to permission to control the branch.



	within Horizon in relation to any facility to edit, delete, etc. data from Horizon).		
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**In relation to Issue 12:**

1.53 [RFI 12.1] KEL cardc1655P states as a solution: *"If a counter is stuck in a 'recovery loop' with the user not being able to use the counter due to not being able to complete recovery then it may be necessary to delete the affected recovery records from the brdb\_rx\_recovery\_transactions table on the branch database. However, this can ONLY be carried out after being given express authority to do so by POL."* Please describe how often such permissions were typically given? Please describe whether this solution was the remedy for any other KELs/issues?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This is a factual question and, in any event, Dr Worden's view is that the experts should delay questions about specific KELs until they have done a better review of KELs, and the questions can be grouped.	Dr Worden declines this as a joint request.	Jason Coyne – Request still valid. I do not agree with Dr Worden that this question should be delayed since Dr Worden has not specified when he is willing to review KELs.

**In relation to Issue 15:**

1.54 [RFI 15.1] Please describe what evidence/reports are provided to a SPM with the Transaction Correction. Are they informed of what the specific transaction was, or combination of transactions in the event of there being multiple causes?

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	Mr Coyne can obtain this information by making enquiries of his own clients.	Dr Worden declines this as a joint request.	Jason Coyne – It is not understood what is meant by my "own clients". Request still

			valid, response still required.
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1.55 [RFI 15.2] Please provide year by year data showing a) Transaction Corrections issued and b) Transaction Correction resolution dates.

<b>Requested By</b>	<b>PO Response to Initial Request</b>	<b>Joint Request Position</b>	<b>Response to PO Response</b>
Jason Coyne.	This request is outside the scope of Issue 15 (which asks how did Horizon process and / or record transaction corrections).	Dr Worden declines this as a joint request.	Jason Coyne – Request modified, response still required.