
From: Parsons, Andrew [GRO]
Sent: Thur 13/03/2014 8:09:22 AM (UTC)
To: Rodric Williams [GRO]
Cc: Belinda Crowe [GRO]
Subject: RE: Strictly Private & Confidential - Subject to Legal Privilege

Rodric

I think we hold fire until we see the thematic report. At the WG meeting on Friday, SS hinted that their concern is not a comms failure between branch and data centre (and therefore a failure to record transactions to the audit log in the DC) but rather it was where a third party system received the transaction (eg. bank withdraws cash from a customer account) but there is then a comms failure that stops the transaction completing at the branch end (eg. customer doesn't get handed any cash). They call this the "one-sided" transaction issue. This point is not expressly drawn out in M014 but does come out more clearly in M001 – Castleton.

This variation on the comms theme is not directly covered in the FJ Data Integrity documents so we may need to commission further work from FJ once we know for certain how SS have characterised this in their thematic report. On that basis, I think that sending more info at SS at this stage risks them asking more questions. My preference is for a targeted attack on the SS' report when we understand the specifics of their position rather than be on the back foot in trying to defend the entire Horizon comms infrastructure.

Please say if you disagree.

Kind regards
Andy

Andrew Parsons
Senior Associate
for and on behalf of Bond Dickinson LLP

Bond Dickinson

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From: Rodric Williams [mailto:[GRO]]
Sent: 12 March 2014 14:05
To: Parsons, Andrew
Cc: Belinda Crowe
Subject: FW: Strictly Private & Confidential - Subject to Legal Privilege




Andy,



What are your thoughts on how we should feed to SS FJ's response below on SS's M014 report?



Kind regards, Rodric

Rodric Williams | Litigation Lawyer


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From: Rodric Williams
Sent: 06 March 2014 11:49
To: Parsons, Andrew
Subject: FW: Strictly Private & Confidential - Subject to Legal Privilege



Pls see below


Rodric Williams | Litigation Lawyer


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From: Kay Alastair [[mailto:!\[\]\(83bbbd261710c59db0214aa27b2edc0d_img.jpg\)](#)]
Sent: 06 March 2014 10:00
To: Rodric Williams
Cc: Andy Holt
Subject: Strictly Private & Confidential - Subject to Legal Privilege

Hi Rodric

The attached Horizon Integrity doc and details of findings on an email referencing Semilong 226226 branch are the specific docs referenced in Question 2

Regards
ALASTAIR

From: Rodric Williams [mailto:[GRO](#)]
Sent: 05 March 2014 18:04
To: Kay Alastair
Cc: Andy Holt
Subject: RE: Strictly Private & Confidential - Subject to Legal Privilege

Alastair,


Thank you again for your email below. So that I know we are looking at the same thing, could you please send me / cross refer me to the specific documents to which you refer in your answer to Question 2, i.e.:


- the "Horizon Integrity Witness Statement and accompanying papers"; and
- the "specific case evidence already submitted" which shows that operator error during the recovery process did not contribute in any significant way to losses at the office.


By all means give me a call if it's easier to discuss.


Kind regards, Rodric


Rodric Williams | Litigation Lawyer


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From: Kay Alastair [mailto:[GRO](#)]
Sent: 05 March 2014 14:29
To: Rodric Williams
Cc: Andy Holt
Subject: Strictly Private & Confidential - Subject to Legal Privilege

Hi Rodric

The following details the Fujitsu response to questions 1 to 4 (which have already been vetted by Michael Harvey and Pete Newsome):

1. Could communications line problems be responsible for: (a) transaction discrepancies; and/or (b) branch losses?

Communications line problems cannot be responsible for transaction discrepancies which lead to branch losses / gains. The answer to question 2 answers why this is the case. They can however be the catalyst for mis-operation by Post Office staff which can cause discrepancies (see the description of the recovery process in the answer to 2 below).

2. What safeguards exist within the Horizon system to protect against a communications line failure becoming responsible for a transaction discrepancy and/or branch loss?

The Horizon system stores a complete basket of a customer's transactions to the Data Centre in one communications interaction. This interaction will be either fully processed or entirely lost:

- There is a digital signature on the whole basket (included in the same interaction) to ensure that the data has not been corrupted en route.
- Every financial transaction has a sequence number. The system checks that there are no gaps in the sequence.

If the entire communications interaction is lost, then there are retries and if these fail the user is made aware of the problem and is logged out.

When the user logs back in the recovery process is invoked. This completes any reconciliation required between the counter and the data centre view of the transaction. Thus a communication fault can only be an indirect cause of a financial loss / gain. This would only be significant if there were a large number of recoveries due to forced Log Outs and the clerk has not settled with the customer (i.e. declared cash or product handed over / received) in line with what has been recorded on the system and notified to the clerk. This subject is also covered in the Horizon Integrity Witness Statement and accompanying papers.

It should be noted that in this specific case evidence already submitted does not indicate that possible mistakes made by the clerk as a result of recovery contribute in any significant way to losses at the office.

3. Specifically, could transaction discrepancies and/or branch losses be caused by: (a) the communications line being shared with a telephone; and/or (b) a “loop” or “noise on the line”?

As stated above, a communications line failure cannot cause transaction discrepancies. The reason for this failure, whether because the line is shared with a telephone or “noise on the line” is therefore not relevant. Clearly these factors may increase the risk of a communications line failure which increases the risk that the sub-postmaster will not be able to process transactions, not that it will causes a discrepancies or losses

4. What does Fujitsu say about the temporal connection between the resolution of problems with the communications lines and the cessation of transaction discrepancies and branch losses?

Fujitsu cannot comment on temporal connections. As stated above, the communication line problems do not, technically, cause transaction discrepancies or branch losses. The Horizon system provides an accurate representation of what was inputted into the system and what was and was not processed, due to communication line issues or otherwise.

The reader might also consider:

- Page 7 of the document M014_POL_Case_Review_Summary_KA[1].pdf does record another discrepancy on 03/04/13 (loss of £108.36) which might refute a statement of “no further allegations”
- Re-use of logins

- Incorrect processing of cheque payments

As contributory factors that could start and cease on any date

Regards
ALASTAIR

Alastair Kay

Project Manager
Post Office Account

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Web: <http://uk.fujitsu.com>



From: Rodric Williams [mailto:[redacted] GRO]
Sent: 03 March 2014 15:30
To: Harvey Michael
Cc: Newsome Pete; Kay Alastair; Andy Holt
Subject: Strictly Private & Confidential - Subject to Legal Privilege

Michael,

As discussed earlier today and with apologies for the delay (IT problems!), can Fujitsu please provide us with an answer to the following questions:

1. Could communications line problems be responsible for: (a) transaction discrepancies; and/or (b) branch losses?
2. What safeguards exist within the Horizon system to protect against a communications line failure becoming responsible for a transaction discrepancy and/or branch loss?
3. Specifically, could transaction discrepancies and/or branch losses be caused by: (a) the communications line being shared with a telephone; and/or (b) a "loop" or "noise on the line"?
4. What does Fujitsu say about the temporal connection between the resolution of problems with the communications lines and the cessation of transaction discrepancies and branch losses?

We require these answers so that we can properly consider the statements made by Second Sight in para's 4.2 ("*Whilst we have seen no technical evidence that links communications line problems to transactional discrepancies, we find the proximity of this solution to the resolution of the alleged problems to be quite compelling*") and 5.1 ("*Whilst we have not been able to establish a direct causal link between communication line problems and the losses reported, we believe that communication line problems did play some part in these losses*") in the attached Draft Report prepared by Second Sight. I also attach the Post Office Investigation Report to which Second Sight's Draft Report responds.

As discussed, we need the answers as a matter of urgency, and are happy to receive them piecemeal if that is going to be quicker. Can you please let me know when we can expect to receive them?

I also look forward to receiving from you the list of the issues which the Draft Report raised for you.

Please give me a call if we need to discuss further.

Kind regards, Rodric

Rodric Williams I Litigation Lawyer

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