

Witness Name: Sudip Sur
Statement No.: WITN08100100
Dated: 21 March 2023

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF *SUDIP SUR*

I, *MR SUDIP SUR*, will say as follows:

INTRODUCTION

1. I am a former employee of Fujitsu Services Limited ("**Fujitsu**"). I left Fujitsu in 2017 and I am currently retired.
2. This witness statement is made to assist the Post Office Horizon IT Inquiry (the "**Inquiry**") with the matters set out in the Rule 9 Request provided to me on 23 January 2023 (the "**Request**"). I was assisted in preparing this statement by Morrison Foerster, who represent Fujitsu in the Inquiry.
3. The topics set out in the Request concern events that occurred between 5 and 23 years ago. I have set out my best recollection of these events in this statement, which relate to (i) the Known Error Log ("**KEL**") system, (ii) PinICL and Peak systems, (iii) Fujitsu's System Support Centre ("**SSC**") (also called the Software Support Centre), (iv) the identification and rectification of bugs, errors or defects ("**bugs**") in the Horizon IT system ("**Horizon**"), and (v) remote access

to Horizon. I have tried my best to remember these events, but it has been many years since I worked at Fujitsu and on Horizon, and my memory is vague on many specific issues.

BACKGROUND

4. I completed my high school education in India, as well as my first undergraduate degree, which was from Calcutta University, Kolkata. Following this, I completed a second undergraduate degree in Electronic and Electrical Engineering at the University of Manchester, England. I then completed a Masters Degree in Power Electronics at Loughborough University, England.
5. Following university, I worked with a few different companies before joining ICL Limited (“**ICL**”) many years ago. My initial professional life was in computer hardware engineering and after completing my Masters Degree, I worked professionally to design and develop communications equipment and other electronic hardware. I recall I first joined ICL in 1982 as a professional computer hardware engineer. After a few years I left ICL to work for Racal Milgo as Principal Hardware designer before rejoining ICL 1987. During my second stint at ICL, I started working in software engineering, and rapidly trained up to become a software engineer.
6. I joined the SSC during the year 2000 as a third line technical software support engineer. When I joined the SSC, it was called the European Development Support Centre (“**EDSC**”) and I served under its manager Mik Peach. I later reported to Steve Parker, who became SSC manager soon after Mik Peach left Fujitsu. When I joined the SSC, Horizon was already live in numerous Post Office branches. I worked in the SSC until I retired during the year 2017.

KEL SYSTEM

7. The KEL system was written primarily by SSC. We would call a known error logged on the KEL system as a KEL.
8. The KEL system was used by the SSC to log all known and reported errors, and to provide instructions on how postmasters should avoid such errors or what to do if such errors occurred. As far as I remember, the frontline support team (known as the Horizon Support Desk or "**HSD**") and the second line support team (known as the Systems Management Centre or "**SMC**"), had read-only access to KELs. The Management Support Unit ("**MSU**") had read access as well as KEL template creation for the SSC team to investigate problems.
9. As far as I recall, MSU team members had regular contact with the Network Business Support Centre ("**NBSC**") to report responses sent by SSC after an investigation or other error-related issues. The MSU team had the responsibility to monitor events or errors reported from the data centre in the form of different "event reports", but I cannot remember the exact names of these reports. MSU would raise Peak calls and pass them to SSC for investigation. After an investigation, SSC would provide responses to MSU via the Peak system regarding why the event was raised, and if there was any reconciliation needed for postmasters (at paragraph 23(b) below, I provide an example of this process). MSU's responsibility was to communicate responses provided by SSC to NBSC if needed, and NBSC would do the reconciliation. The MSU also received exception reports generated from the data centre due to abnormal/failed transactions. Following such failure/s MSU would raise Peaks as well as a new template KEL/s if necessary.

10. KELs were written mainly for members of HSD and SMC. At Fujitsu, HSD were the main point of contact for postmasters. The KEL database had a facility for reported problems, and my recollection tells me that HSD and SMC had access to search the KEL database for reported problems. If no KEL was found then it was their duty to raise an incident explaining the problem and highlight that no KEL existed.
11. In my view, the KEL system served its purpose if used correctly, wisely and with patience. During my time with SSC, I experienced some HSD staff acting a little impatiently or not reading the KEL at all, or reading the KEL and not taking appropriate action to pass the call to SSC for action. My recollection tells me that this problem was mainly with the HSD where staff turnover was high, which I understood through my telephone conversations with HSD colleagues, and not all staff were fully trained on how to access or search the KEL system. If HSD staff did not find a KEL they would raise an incident call suggesting no KEL existed. When the call was investigated by SSC and a KEL was found the incident would be sent back with the KEL details to help postmasters.

PINICL AND PEAK SYSTEMS

12. The Peak system is a call logging system. We would call an incident logged on the Peak system as a Peak or call.
13. Peak calls were used to report various errors, for example, Horizon counter error, potential software error, data centre error, postmaster reported errors. The Peak system was developed within SSC and was widely used by the SSC and the fourth line software development team. In my view, the Peak system served its purpose for logging software errors, usability issues, and to help postmasters via

HSD and MSU team members. I cannot remember much about the PinICL system as it has been many years since I used it.

14. As far as I remember, the calls logged on the Peak system were prioritised as follows:

- a. Priority A: Business stopped, postmaster unable to run business.
- b. Priority B: Business not stopped but Horizon functionality failing.
- c. Priority C: Business not stopped but postmaster needs help or advice.

15. There were other lower priorities for calls but I cannot remember the details. HSD initially assigned the call priority based on their experience and the reported problem. SSC were able to upgrade or downgrade priorities if necessary.

16. Peak calls would be considered closed:

- a. When an error was resolved by delivering a software fix.
- b. After providing a workaround. If the reported problem had a higher priority ("A" or "B"), the SSC would call the postmaster as a matter of courtesy and pass on information about the known issue and workaround.
- c. Providing a KEL number that described the known issue reported in the past. SSC would pass the KEL number to HSD to convey the known issue and workaround to postmasters or the call logger.
- d. If the Peak call was an enhancement request and not a design fault. As far as I remember, enhancement requests would be made if a reported

problem was found to be “no error” and the system was working as per design specifications agreed with Post Office Limited (“POL”). For enhancement requests, the Peak would be sent to the development team to register the request. Once the request has been registered, the call was returned to the call logger to convey the message to the postmaster. The error condition was also included in the enhancement request list, if I recall correctly, for management meetings with POL, which was not involved in.

SOFTWARE SUPPORT CENTRE

17. SSC team members were highly technical and highly motivated to help POL and postmasters. Within SSC, the team was split to provide different levels and types of support. Different members within the SSC specialised in different technical areas, for example, Horizon counter issues, data centre and transaction harvesting, and transaction reconciliation issues. My primary role was to deal with Horizon counter issues, printer issues, Pinpad issues, and many other problems that I am unable to recall.
18. I do not know what qualifications or experience were required to be a member of the SSC, this would be better answered by the SSC manager. One thing that was common was that all SSC members had a software engineering background.
19. When I joined the SSC, the team had a flat structure under manager Mik Peach. Everyone under the manager, as far as I remember, was a “Systems Support Specialist”. The team structure changed after Mik Peach left Fujitsu and Steve Parker became the SSC manager. Under Steve Parker there were several

smaller teams and each team had a team leader and I was under the leadership of John Simpkins. As I mention above, I worked in the SSC from 2000 to 2017. When I left the SSC, I believe there were 25 or less team members.

20. After I joined the SSC, I received Horizon product training and was given a mentor. No new joiners were thrown into the deep end after joining. My mentor guided and helped me learn the security aspects of Horizon and the strict security procedure on how to access live Horizon counters and data centres to support Post Office business. Accessing live counters on a read-only basis was an essential part of SSC's support role, we needed the read-only access to live counters in order to investigate problem/s reported by postmasters. Most of my work at the SSC using remote access was performed using read-only access. For example, when a postmaster reported a network banking transaction failure, I needed read-only access to live counter log files from the counter to analyse what "key presses" the postmaster had done and why the transaction failed. SSC also had write access, which I explain below at paragraphs 33 to 38.
21. Peak calls were monitored every day during working hours. One of SSC members referred to as the 'Pre-Scanner' had the duty to check each incoming Peak call and assign the call to an SSC member according to the priority of the call or nature of the reported fault. Higher priority Peak calls, where a postmaster's business had stopped or there was a major incident at the data centre, were sometimes dealt with more than one SSC member, involved the fourth line development team, or both.
22. The SSC team were the "Third Line Support" in the overall support services structure, and SSC worked closely with the HSD (first line support) and SMC

(second line support) whenever possible to action Peak calls. Any calls registered with an "A" priority raised by a postmaster were actioned swiftly.

23. My recollection of the working relationship between the SSC and MSU has faded to some extent, but I can recall that:

- a. MSU had close dealings with the NBSC.
- b. MSU was responsible for monitoring major incidents reported from data centres or POL, and the SSC worked closely with MSU to resolve and respond to any major incidents raised and provide help and advice to NBSC. I cannot remember any specific Peak calls for major incidents raised by MSU. However, I do remember that, for example, MSU raised "A" priority "State 4 exception" banking transaction incidents. These "State 4 exceptions" were raised automatically from the data centre after a banking transaction although authorised by the bank was not successfully completed by the postmaster. Such Peak calls were passed to SSC for investigation. SSC then investigated the calls and provided a response back to MSU to report back to NBSC for any financial reconciliation if necessary. As far as I remember, most of such incidents were caused as a result of "poor networking". The authorisation message from the bank sometimes did not reach the Post Office branch on time due to delayed communications. When this happened, the transaction at the counter would fail (time out) and the postmaster would not honour the transaction request from customer.

24. I am aware that some SSC members and management had contact with the NBSC, but I personally did not have any direct dealings with the NBSC.

25. I cannot comment on whether the SMC referred an appropriate number proportion of calls to the SSC, as my recollection of such matters has faded significantly.

IDENTIFICATION AND RECTIFICATION OF BUGS, ERRORS OR DEFECTS

26. In the Request, the Inquiry has asked me to set out my recollection of the identification and rectification of:

- a. The bugs identified in Appendix 2 ("**Appendix 2**") of *Bates and others v. Post Office Limited (No. 6) "Horizon Issues"* [2019] EWHC 3408 (QB) with the findings made at Appendix 1 ("**Appendix 1**"), except for bugs 16, 17, 21, 22 and 29.
- b. Any other bugs that had the potential to cause apparent discrepancies or shortfalls in branch accounts, or undermine the reliability of Horizon to accurately process and record transactions.

27. As well as looking at Appendix 1 and Appendix 2, I have been shown Peaks and KELs where my name is mentioned, which are said to relate to the bugs identified in Appendix 2 (except for bugs 16, 17, 21, 22 and 29). My recollection of the software bugs SSC had to deal with, and the process Fujitsu would follow when a software bug was identified, has faded significantly. I cannot remember dealing with or being aware of any of the bugs referred to in paragraph 26 above, but my understanding of the process that Fujitsu would follow when a software bug was identified is as follows:

- a. The SSC member would be assigned the Peak call as I mention in paragraph 21 above. As far as I recall, the SSC member would

investigate the problem by attempting to recreate the fault on the SSC's test rig and the Live System Test ("LST") rig, and this process could involve more than one SSC member. Any Peaks registered with an "A" priority that involved a Post Office's business being stopped or severely affected were investigated urgently. The LST rig represented the latest level of Horizon counter software and it was normally used by the test team to carry out a set of tests prior to releasing software to the live estate.

- b. If the root cause could not be identified by SSC, the Peak would be transferred to the fourth line development team for help and further investigation. The development team had, as far as I recall, full access to Peak calls for response.
- c. If the root cause was due to a software bug and there was no workaround, I understand that the Peak would be added to a list and wait for authorisation for the software fix to go ahead. This part of the process was outside my remit, and a different team would be responsible for obtaining authorisation, which I believe was from Fujitsu and POL.
- d. Once the software fix had been produced by the fourth line development team, it would go through a LST rig to ensure the bug had been fixed without affecting other parts of Horizon.
- e. Once the software fix received approval, it would go out to the live system and the Peak would be closed. As far as I remember it was the responsibility of MSU to communicate with NBSC and HSD to communicate with affected end users.

28. If the fault was recreated and there was a workaround which was easy and acceptable to the postmaster who reported the issue, the SSC member who was dealing with the Peak would contact the postmaster who reported the problem to discuss the workaround. As I mention above at paragraph 16(b), SSC used to discuss such issues with postmasters as a matter of courtesy and depending on priority. If the postmaster was happy with the workaround suggested by the SSC member, the Peak call would be closed and a KEL would be recorded recommending the workaround if the problem was reported again by another postmaster. I cannot remember if workarounds could be rejected by postmasters.
29. The SSC had policies and procedures in place to deal with different business issues within Horizon. I cannot recall any policies as to what information may or may not be passed to postmasters. I am unaware and cannot recall there being any practice, policies or procedures regarding what information could be provided to postmasters in relation to potential bugs.
30. Where I did not have sufficient time and resources to deal with a particular Peak, I would have asked for the Peak to be assigned to someone else, who would be able to deal with the problem better. As far as I remember, SSC found resources from within or from other teams when needed. If I was dealing with a problem and then realised I was not the right person to deal with that problem, or I was busy dealing with another Peak which had higher priority, the Peak would be reassigned to someone else who had the time or was better equipped to deal with it.
31. I am unable to explain how the SSC investigated problems suspected to relate to third-party software as my specialist area did not involve such issues. It was

outside my remit. For example, underlying Escher software was outside my speciality. When dealing with a problem, if I suspected there was a bug that might be due to Escher software, I would pass the Peak to someone else who had dealings with Escher software.

32. SSC team members always investigated Peak calls to identify whether the reported problems were caused by underlying software. There was a clear process when a potential software bug was identified, and I was never put under any pressure to hide a potential bug in Horizon from anyone, including postmasters and POL. During my time at the SSC, I spoke with postmasters many times but I cannot recall specific discussions.

REMOTE ACCESS

33. During my time at the SSC, all SSC team members had remote access to Horizon counters as well as data centres except the new joiners.
34. SSC team members used remote access on read-only basis for investigations into problems, and write access was only used when POL authorised the SSC to make necessary changes. I can recall using remote access personally on a read-only basis, but not a write basis, in Legacy Horizon.
35. I can recall using remote access personally on a read-only and write basis using HNGX. Any write access went through a very strict protocol and required approval from POL. I cannot remember the details after so many years leaving Fujitsu. I can remember one scenario, where there were many postmasters who were for some reason unable to rollover their Post Office branch accounts regularly. Once a financial accounting year had passed, and the Post Office branch was still experiencing the same issue, further intervention would be

required from POL. In this situation, it was POL's responsibility, as far as I remember, to investigate the problem and ask Fujitsu to make any data amendments in the data centre to put the Post Office branch in the "current financial year", so that the Post Office branch could run normally.

36. As far as I recall, Fujitsu and POL had a contractual arrangement to manage the live Horizon estate. The contractual agreement is totally outside my area, but I believe this involved accessing the live estate on a read-only basis for investigation into problems. Any write access to the live estate required POL involvement and prior written authorisation, and all access was recorded and witnessed normally by another SSC who would be familiar with what was being done.

37. As a member of the SSC, I used remote access to Horizon counters on a read-only basis to collect relevant counter log files to investigate what a postmaster had or had not done which may have caused a reported error. For example, when a postmaster reported a banking transaction failure, the relevant log files would highlight what may have happened. Other examples of issues that I would investigate included reported counter printer or Pinpad installation errors. I am unable to recall any specific times where I used write access.

38. Remote access was done via correspondence servers to counter workstations, and the SSC only used secure workstations and servers to gain remote access. I cannot remember the names of the tools I used to access workstations and servers remotely. As far as I remember, remote access was always recorded with the name of the SSC team member and a date/time stamp of when the SSC team member had logged in and out of an SSC secure workstation.

GENERAL

39. In the Request, the Inquiry has asked me if I believe postmasters had access to adequate advice and assistance in how to use Horizon. As I mentioned in paragraph 3 above, it has been many years since I worked at Fujitsu and on Horizon, and my memory is vague on specific issues.
40. I can recall that during my work with Horizon, and sometimes personally dealing with postmasters, I felt that not all postmasters had the training they needed to run a banking and financial business. I came across some postmasters not following Post Office's business procedures for Horizon. For example, many postmasters had a local grocery shop and Horizon tills were used for combined grocery sales as well as Horizon business, and this type of work practice affected regular Horizon cash declarations. Horizon needed cash declarations to be completed every day, and during my time at the SSC responding to Peaks, another example I can recall were postmasters experiencing problems with Horizon because they did not count and declare the cash stored in the till, which would cause a discrepancy. These problems may have been due to a lack of training and assistance.
41. The Inquiry has asked me what, if any, changes to the support services provided by Fujitsu would have improved the advice and assistance received by postmasters. With hindsight, I believe the support desks (first line, second line, SSC and fourth line) could have been better structured. I felt that the support desks were run as separate business centres, and there should have been a more coordinated effort. Perhaps the SSC should also have been more involved in dealing with postmasters.

Statement of Truth

I believe the content of this statement to be true.

Signed: **GRO**

Dated: 21/3/2023