

Susanne Helliwell
Weightman Vizards
41 String Gardens
Manchester
M2 2BG

21 January 2004

CC: Mrs Wolstenholme

Dear Madam,

Re: Post Office Counters Ltd. -v- Mrs Julie Wolstenholme: Claim Number CR101947

Please find enclosed my brief note after reviewing the papers in the above matter.

Best regards,

Jason Coyne

Opinion

Re: Post Office Counters Ltd. -v- Mrs Julie Wolstenholme: Claim Number CR101947

I have been contacted by Weightman Vizards a law firm representing 'Post Office Counters LTD' and Mrs Julie Wolstenholme, an individual, and requested to make initial observations that would be of value to the court in the matter of "Post Office Counters Ltd -v- Mrs Julie Wolstenholme" in the Blackpool County Court, Claim number CR101947.

My initial opinion, prior to examination of call logs provided, was that it would be difficult to establish if the level and type of support calls made by Mrs Wolstenholme were 'reasonable' or otherwise without having access to levels and type of support calls made by a comparable post office branch. It was explained to me that this direct comparison was not possible, due to such logs not being available and as a consequence I have been instructed to conduct a more detailed review of the material already available.

In light of the above I do not consider that I am required at this stage to produce a full expert witness report as such, and have therefore set out my initial opinions in the format below.

This more detailed examination focused on the following documents provided to me :-

- Claim form dated 19 April 2001 and amended Particulars of Claim dated 17 February 2003.
- Amended Defence and Counterclaim dated 14 April 2003
- Reply and Defence to Counterclaim
- Order dated 6 October 2003
- Claimant's List of Documents
- Defendant's List of Documents
- Claimant's witness statement
- Defendant's witness statement
- Additional set of call logs disclosed by the Claimant to the Defendant.

My observations considering the documents are as follows:

The statement from Ms Elaine Tagg, the retail network manager of the Post Office Ltd, at para 11 stated that:

"Mrs Wolstenholme persisted in telephoning the Horizon System Help Desk in relation to any problems which she had with the system generally, these problems related to the use and general operation of the system and were not technical problems relating to the system."

This, in my opinion is not a true representation on the evidence that I have had access to. Of the 90 or so fault logs that I have reviewed, 63 of these are without doubt system related failures. Only 13 could be considered as Mrs Wolstenholme calling the wrong support help desk requesting answers to "How do I ..?" type training questions.

The majority of the system issues were screen locks, freezes, and blue screen errors which are clearly not a fault of Mrs Wolstenholme's making, but most probably due to faulty computer hardware software, interfaces or power. In fact, on a detailed view of call 11021413, dated 2 November 2000, Ms Tagg may have witnessed first hand the style of system problems that Mrs Wolstenholme experienced in her operation of the system. This fault log notes that: "Elaine reports that one of the counters has a blue screen with the message STOP 0x000000a" and was advised by the operator to "reboot".

Although not uncommon in my experience of support helpdesk's, I find it disconcerting that the helpdesk's first line support consistently advised Mrs Wolstenholme to "reboot" the system (ie. switch the equipment off and back on again), without trying to understand the cause of the error. It can be noted that a re-boot was advised in 47 out of the 63 occasions where system errors were logged. This instruction treats the effect and not the cause, leaving the actual fault which caused the error intact, and with it a recurrence seems inevitable.

Opinion

The types of faults, as reported in the faults logs were:-

"System Freezing" which is most probably due to either the hardware or interfaces crashing; or alternatively fully saturated communication lines.

"System Halts displaying..." or "Blue Screen" which are almost certainly hardware faults.

It seems that each time that the system halted, the screen would display an error code. From this error code, it would have been possible for the helpdesk operatives to establish the detail of these hardware faults. However, it seems that this type of analysis was not undertaken by the helpdesk with a simple re-boot being the preferred method of dealing with the issue.

That said, on a number of occasions, certain elements of counter equipment were indeed exchanged but without any real improvement in the situation until around the end of June 2000.

The number of fault logs reduces after the end of June 2000, this could be due to the system faults reducing in frequency i.e. being fixed, or simply that Mrs Wolstenholme tired of the support department telling her to reboot the system (an activity which she could do herself). I have no information to form an opinion either way.

It is interesting and certainly warrants further examination that in November 2000 the 'system freezing' is reported again with the support operator stating: "They all freeze, but if it gets bad give us a call and we will investigate" [11084054 dated 8 November 2000]

From the 31st of October (starting at call log number 10253234) there seems to be a number of logs which talk of 'large discrepancies' in stock figures, trial balances with "all sorts of figures showing minus figures" [Call Log 10311359].

Referenced in call log 11012223 there is a comment noted by the support operative that the "*pm advised that this is an intermittent problem occurring since the counters were upgraded on 23.10*". Although the documents do not list an upgrade taking place, it does seem that these "large" reported discrepancies occur very frequently and shortly after this noted upgrade. Again this should be investigated further as another six system errors were noted in November which seem to be a resurgence of the earlier, pre-July type errors.

Opinion

In Summary:-

From a computer system installation perspective it is my opinion that the technology installed at the Cleveleys sub-post office was clearly defective in elements of its hardware, software or interfaces. The majority of the errors as noted in the fault logs could not be attributed to being of Mrs Wolstenholme's making or operation of the system.

The helpdesk operated by the Post Office would seem to be more focused on 'closing calls' than attempting to get to the bottom of the continual recurrence. The instruction to 're-boot' would allow a call to be closed as the postmaster could continue to work once the system had powered back up.

Without further examination, it is unclear whether the reduction of calls logged between July and late October 2000 is attributable to a period of comparative system stability or merely user disillusionment with the helpdesk. What is more clear is that from late October recurrences of faults, which had been the subject of earlier logged calls, are reported once again along with worrying 'discrepancies' in audits. This may, or may not be to do with an 'upgrade' of the counters which seems to have occurred on or around the 23 November 2000, or may simply be an unconnected recurrence of the earlier faults.

Jason Coyne

20 January 2004

CPR35 Statement and CV

I confirm that I have made clear in my report those facts that are within my own knowledge and which I believe to be true, and that the opinions I have expressed represent my true and complete professional opinion.

I have no known connection with any of the parties, witnesses or advisers involved in this case.

Under the requirements of the Civil Procedure Rules 1999, as amended in January 2002 I confirm that I fully understand my duty to the court and I have complied and will continue to comply with that duty.

My business address is:

Best Practice Group PLC
106 Baker St
London
W1U 6TW

Law Society 2003 Accredited Expert Witness No. 229.

I am a troubleshooting specialist in computer system procurement, implementation, design, infrastructure, hardware configuration and software development. My experience over the last 15 years is as follows: -

Hardware/infrastructure/operating systems:

Novell;

Windows NT, 3x, 95, 98, 2000,2003, ME, XP;

Unix (most variants), Solaris, Xenix, AIX, VMS;

IBM AS400, RS6000, Sun, Amdahl, DEC (now Compaq), Hewlett Packard and most PC based equipment;

3COM, Cisco, Aircom;

Ethernet, Token Ring, SNA, CAT5 and various Fibre Optic configurations.

Server Centric Computing

Internet communications, MPLS, VoIP and VPN

Software development:

Languages – Dataflex, Powerflex, Oracle Forms, Delphi (Pascal), Visual Basic, Foxpro, Dbase, Access, Informix and Progress;

Databases – Oracle, Informix, Sybase, Sequel, Dbase, Powerflex and Dataflex.

Application Systems design in Manufacturing, Distribution, Mail Order, CRM and Point of sale.

My experience spans the management of around 400 core business installations, of which approximately 170 were described as failing prior to my engagement. My instructions are often to provide advice to steer projects to completion

