WITN04760100

Witness Name: Mark Andrew Ascott

Statement No.: WITN0476_01

Exhibits: WITN0476_01/1 - WITN0476_01/10

Dated: 4 August 2022

POST OFFICE HORIZON IT INQUIRY

FIRST WITNESS STATEMENT OF *MARK ANDREW ASCOTT*

I, *MR. MARK ANDREW ASCOTT*, will say as follows:

INTRODUCTION

1. I am currently a Lead Test Practitioner at Fujitsu Services Limited ("**Fujitsu**"), a position I have held since July 2008.
2. This witness statement is made on behalf of Fujitsu to assist the Post Office Horizon IT Inquiry with the matters set out in the Rule 9 Request provided to Fujitsu on 11 March 2022 and a series of follow-up questions provided to me by the Inquiry on 1 July 2022 (the "**Request**"), to the extent I have direct knowledge of such matters.
3. The topics from in the Inquiry's Request of which I have knowledge of relate to events that took place many years ago. Such topics include the design and development of the Horizon system, acceptance criteria and testing. I have tried to remember these as best as I can. However, given the length of time, there may be certain matters where my recollection is more limited.
4. Where I have included information from documents relevant to the Inquiry's Request, these documents are referred to using references WITN0476_01/1 to

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WITN0476_01/10 and are listed in the index accompanying this statement. To the extent that these documents have not already been provided to the Inquiry, they are exhibited to this statement.

BACKGROUND

5. In August 1998 I worked for a Fujitsu business unit known as the "The Solution Centre". I had completed a three year assignment working at Canary Wharf, London. On my return to "The Solution Centre" I accepted an assignment with the ICL Pathway programme. My assignment to ICL Pathway Limited started in September 1998. Between September 1998 and December 1998, I worked for a Pathway testing team. I reported into John Lyon, a technical manager. There were around twelve members in this team at the time. The team comprised of Fujitsu employees and freelance contractors. In the team, I also worked with Garrett Simpson and Deborah Richardson.
6. In January 1999, I was transferred into the Pathway organisation reporting into Alan D'Alvarez. My role changed from test to development and I was assigned to work in the Secure Builds Development ("**Secure Builds-Dev**") team. Initially, I was the only member of the Secure Builds-Dev team. In this period, I worked with Belinda Fairthorne to set up the Windows NT4 Domain structure for the Bootle and Wigan data centres.
7. In 2000, after a re-organisation of the Development teams, I worked for a team known as the Infrastructure Products Development Unit ("**IPDU**"). In this role, I reported to Pete Dreweatt who, in turn, reported to Ian Morrison. Alongside IPDU was a development team known as the Applications Products Development Unit ("**APDU**").

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My recollection is that Alan D'Alvarez headed up APDU. From 2000 – 2001 my responsibilities increased and I started leading other teams within IPDU. I was responsible for the FTMS-Dev, Audit-Dev, OCMS-Dev, Auto-Config-Dev and Maestro-Dev teams. These development teams consisted of two or three developers. The Maestro-Dev and Secure Builds-Dev consisted of one developer.

8. My recollection is that in 2002, a further reorganisation of the Development teams took place and IPDU and APDU merged into a single Development team. This new Development team was led by Alan D'Alvarez. After the merger, I reported into Mark Taylor and Mark Taylor reported to Alan D'Alvarez. Alan D'Alvarez reported into Peter Jeram, who led the Systems Integration (SI) unit.
9. I spent my working week split between Feltham and Bracknell. The Auto-Config-Dev team were located in Manchester. Circa 2004, this Manchester team relocated to Crewe.

"Morning Prayer" Meetings

10. At Pathway, we held "Morning Prayer" meetings which took place early each work day morning. I recall these meetings starting at 8:30am. I started to attend the Morning Prayer meetings when I was part of the IPDU development team. Morning Prayer meetings were hosted by senior managers and it was common for individuals such as Peter Jeram, Alan D'Alvarez and Gill Jackson to chair these meetings. Development Managers, Test Managers, PIT and SPTS Managers, Network Managers and the core architect leads such as James Stinchcombe, Simon Fawkes, Dave Johns and Alex Robinson would attend the "Morning Prayer" meetings.

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11. The focus of Morning Prayer meetings was to identify priority actions for the team to complete that day based on progress updates from the previous day. The priority PinICLs/Peaks that were impacting progress in the test phases were frequently reviewed at these meetings. Delays from third-party suppliers (such as delays in purchasing licenses for software tools) were also reviewed at Morning Prayer meetings. Through the Morning Prayer meetings, the delivery teams developed a close working relationship.
12. Under the leadership of Peter Jeram, the Systems Integration (SI) unit created an end-to-end process document which described the inputs, processes and outputs of each delivery team. This document defined the interface points between the teams. All the team members in SI contributed to this process document, and the whole team reviewed and agreed the document. Through the process of creating this process document, all the teams knew the interaction points between the teams.
13. The development teams also hosted another weekly review meeting which considered Change Proposals. This review was known as the Engineering Change Control Board (ECCB). This meeting had the purpose of coordinating change impacts from the Development, PIT, SPTS and Test teams. Change Proposals were reviewed and a technical sponsor (someone from the team) for a given Change Proposal would provide a summary of the solution change or potential options for the change. These discussions would result in technical details being understood by all teams.
14. The main output from the ECCB meetings was that teams were able to provide impact statements and list dependencies that could then be fed back into the Fujitsu POA Change Manager (Ken Westfield/Graham Chatten). The senior delivery team

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managers would also participate in Provisional Change Control Board (PCCB) with the aim of authorising Change Proposals for review with Post Office.

15. By the end of August 2005, I left the Post Office Account ("**POA**") to work on a different account but returned in July 2008.

DESIGN AND DEVELOPMENT

16. I had limited involvement in the design and development of Horizon. I was aware that Horizon involved the use of an Escher counter but I cannot comment on the design and development of the general Horizon IT project in detail. Rather, I will comment on the design and development that I was responsible for in this period.

17. In my role as the File Transfer Managed Service ("**FTMS**") Solution Design Authority, I was involved in updating a number of the relevant high-level designs and reviewing the low-level designs for the FTMS components.

18. The design aspects that I was responsible for were based on the set of policy security documents that were in place at the time. These documents defined the parameters within which we had to work. For example, they contained policies in relation to access control that we implemented in the designs for our components. The versions of these documents that were in place during the period 1996 – 2000 are exhibited with the following references: WITN0476_01/1- WITN0476_01/5.

19. My recollection is that Belinda Fairthorne was a key author/contributor to the production of these security policy documents. I used these security documents to develop Secure Build Windows scripts that the Secure Builds-Dev team provided to the Product Integration Team (PIT).

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20. I regarded the security architects I worked with as subject matter experts and deferred to their knowledge and design thinking. If I did not understand part of their designs I would discuss my concerns with them so that I could gain a complete understanding of their designs. Once the NT domain designs were approved by the senior design team in Fujitsu and were due to be taken forward, I developed tooling and scripts that were used to implement the secure builds on the various Windows platforms. I also worked with the Product Integration Team ("**PIT**") that was based in Feltham. This team incorporated the scripts into the work they were doing, which resulted in platforms being built and deployable.

21. The wider design team was also based in Feltham. The senior designers that I worked with at the time of the early Horizon period included James Stinchcombe, Simon Fawkes, Nial Finnegan and Glenn Stephens. When a team was modifying designs, senior designers would guide such changes. Any design document would also have been reviewed, assessed and authorised by one of these senior designers.

22. Design documents were produced in accordance with the Document Management processes in effect at the time. My recollection is that Iqbal Rahman was the Software and Document Change manager when I worked at the Feltham office (1999 – 2005). The software and documentation repository used in that period was PVCS (now called Dimensions). A document had to have a PVCS allocated document reference before it could be stored in PVCS.

23. The design documents that I and my development team worked on were sent for a minimum of one review cycle amongst the team. Some documents completed two review cycles before entering the approval process.

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24. A reviewer matrix provided guidance on which teams were required as mandatory reviewers and which were required as optional reviewers. The document reference type provided guidance on who would provide approval for a high level design document. For most design documents, senior architects, subject matter expert designers and one or more senior development manager(s) were the approval authority. The reviewer matrix also provided guidance to document authors with respect to external recipients such as Post Office staff or other Third-Party Supplier recipients.

25. Review cycles required document reviewers to submit comments using an excel spreadsheet which captured information metrics. A review cycle end date was indicated in the excel spreadsheet too. Once the review cycle end date had passed, the document author would update the document to address the comments received and update the excel spreadsheet so that the reviewer could see how their feedback had been addressed.

26. Once the document author had addressed all the comments, document leads would prepare for a second review cycle, if needed, or prepare for the approval process. The version control and history sections and the footers would be updated to show a full integer number for the approved version. For example, a draft document at version 0.6 would become version 1.0 the first time that it went out on the approval process. Once a design document reached an approved status, the design could be used by development teams to begin the code writing cycle.

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ACCEPTANCE CRITERIA AND TESTING

27. I cannot comment on the complete testing process but I have set out below my knowledge of this area. I worked on unit testing from January 1999 to around October 2001, which was part of the development team. In doing so, I devised a set of tests to demonstrate that coded changes were successfully made. Once components were declared ready to go, they would be registered in PVCS. The PIT would then produce scripts to enable the baselines or design parts to be deployed. Once deployable, the Service Provision of Test Services ("**SPTS**") team would then build the test rigs.

28. From 1999 to 2005, there were seven test rigs located in Feltham. Five of these rigs were operated by Fujitsu and two were operated by Post Office. Chris Young was the Post Office test manager who was responsible for the two Post Office controlled rigs. One of the two Post Office rigs was known as the Release Rig. I believe that the Release Rig provided Post Office with the ability to examine a release change before it was authorised for release into the Live service.

29. At this time, the senior Fujitsu test managers would have been Kevin Barrett, Dave Royale, Gill Jackson, Deborah Richardson. The Fujitsu Provision of Test Service manager was Mike Anderson. Some of these Fujitsu managers would have worked closely with Chris Young to help complete his tasks. My recollection is that the relationship between Fujitsu and Chris Young and his Post Office colleagues that worked in Feltham was conducted in a professional manner based on mutual respect.

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I worked with this test team and helped them diagnose unexpected incidents and confirm issues for resolution.

30. One of the Fujitsu test rigs was known as the Performance test rig. The Performance test rig was managed by a Performance test lead or a performance test manager. The test rig manager and an individual known as the "rig runner" worked with the SPTS manager/team members to co-ordinate release updates onto their rig. Each test rig had a rig runner. The rig runner role was key to making sure the test rigs were updated and ready for a release test phase to start.

31. During a release test phase, the rig runner was responsible for making sure that the Maestro 24x7 batch scheduler was running and executing as designed for the release under test. The other test team members involved would check daily with the rig runner at the start of the day to confirm the rig was useable and in a valid state to conduct testing. When testers had a need for specific data to be loaded and installed they would make their requirements known to the rig runner and the rig runner would deploy the data requested.

32. My recollection is that High Level Test Plans and Test Reports included Post Office staff as recipients and reviewers of draft and approved documents. The internal and external distribution list was determined/mandated in the document reviewers matrix. My recollection is that Post Office shared outputs for the test phases which they managed/owned with their Fujitsu counter parts.

33. Functional testing conducted by POA required test cases that could be executed from Horizon counters that mimicked customer transactions and functional activities that Post Masters, Clerks and Crown Office staff would perform. For example, tests would

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be conducted that exercised purchasing stamps, postal orders, vehicle road tax, foreign currency, insurance policies. Test cases would have been performed to exercise purchasing stamps as a single item. But there were also test cases for purchasing stamps combined with other transaction types which would make up a "mixed basket". These mixed baskets would lead to tests which exercise the "transaction settlement processes". Tests would have been conducted to exercise Post Master/Crown Office tasks such as reporting and stock management. Tests would also have been conducted to confirm Horizon counters could be updated with reference data and the changes that new reference data would deliver.

34. In the period 2008 – 2010 when HNG-X Release 1 was being developed, the SV&I test phase was the main phase where the new HNG-X Counter was tested in combination with the data centre systems. SV&I test cases for the HNG-X counter continued to include "use cases/user cases" as they had become known. These use cases/test scripts mimicked real transactions as they would occur in the Live Production service.

35. The V&I "test pack" included test cases for the most popular reporting types and these tests were executed on Wednesday afternoons/evenings to mimic Post Master behaviour.

DELT TESTING AND THE INDEPENDENT TESTING TEAM

36. Fujitsu also used a DELT rig as part of the final testing cycle that we had in development. This was a test rig which had a number of various server / platform components produced by the development teams. The DELT rig was used to provide the development unit with a view that solution components being produced or

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modified were ready to be passed from development ("**DEV**") into the independent test unit ("**ITU**"). The DELT rig was owned and managed by the development team.

37. The DELT test phase was the final test phase of the development delivery plan. Before DELT testing took place, individual development teams contributing changes to a release would conduct unit/module testing. Some development teams would conduct component testing as well. Some development teams, such as the Database Host team, would have used the DELT test rig to examine their release deliverables.

38. The DELT rig was maintained and operated by two members of the development team. My recollection is that they reported into the Database Host development manager.

39. Prior to reaching the ITU test team, release changes/deliverables were processed/packaged by the Product Integration Team ("**PIT**"). Output from the PIT team was made available to the Service Provision of Test Services ("**SPTS**") team. The SPTS team would build/update the test rigs so that ITU test teams could test the release deliverables. During the ITU test phases, the test plan would indicate when the Post Office test teams would have their two test rigs updated with the release under test. When that activity on the plan was reached, the SPTS team would build/upgrade the Post Office test rigs with the latest version of the release which would include defect fixes identified by the Fujitsu ITU testing phases.

40. With respect to the final testing cycle, my recollection is that releases approved and signed-off ready for Live service by the ITU test team were prepared and handed to

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the POA/Pathway Customer Service Division for this organisation to conduct final testing before releasing into the Live Production service.

41. On completion of DELT testing, an independent testing team at Feltham would then test the solution. The SPTS team would apply the release components to the test rigs that required those components. Once the SPTS team finished rolling out the code, the test team leader of a rig would take ownership of that rig and they would carry on their testing activities. In the 1999-2005 Horizon period, the Independent Test Unit comprised of Fujitsu employees and freelance staff contracted to work in the ITU test teams. I believe the senior ITU test manager would have reported to Terry Austin and then into Pete Jeram's Systems Integration unit. The senior members of the ITU test team that I remember are Kevin Barrett, Dave Royale, Gill Jackson, Deborah Richardson, Harji Hothi, Hermia Figuieredo. Pete Dreweatt was also a member of this team managing the level 4 test plan.

42. In order to provide testing against Post Office requirements, the ITU test team organised its team members to achieve the required planned release deliverables.

TESTING AND DELAY: NATIONAL ROLLOUT

43. A key function of testing is to identify defects in system solution components, such as with the software code or infrastructure components. These all result in additional time being required to understand the defect/issue and identify a solution. Time is required to create the fix resolution and plan how the fix resolution is delivered. Time is also required to deliver the fix into the appropriate test environments and to retest the fix resolution and determine that the fix resolution has resolved the defect/issue. A defect found in the System Test environment could cause delays to testing a

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solution component in the SV&I test phase which in turn may cause delay to later test phases in the planned sequence.

44. My recollection of the 1999 – 2005 Horizon period is that delays to release deliveries were mostly of a short duration, for example, 3 to 8 weeks. The use of a planning / time recording tool known as AMS Realtime planning helped track progress through the delivery of the entire Level 4 plan. POA stopped using the AMS Realtime planning tool in accordance with Corporate Fujitsu instructions for all Fujitsu organisations to move a single time recording system. In July 2008 when I re-joined POA, AMS Realtime was not in use.

DEFECTS RAISED IN TESTING

45. If teams reported defects during testing, these would be logged in the PinICL database and relevant ones would get assigned back to my team. We would then deal with them on a priority basis.

46. There was also a quality filtering process ("**QFP**") that sat within the development function. The QFP was introduced by Alan D'Alvarez when Alan was Head of Business Application Development. My recollection is that this process was introduced circa 2001-2002. The aim of the process was to identify Peaks/PinICLs that were causing blockages/stoppages to test phases and thus causing delays to release delivery plans. My team and I would then go through the QFP list of defects and state when the team could implement the fix. If a defect could not be fixed within a certain release window, we would look to deferring it to a future release, based on Post Office's requirements.

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47. The QFPwas chaired by Lionel Higman. Lionel would create a spreadsheet listing all open Peaks / PinICLs raised by the ITU Test team or by the Post Office test team that were reported against the release being developed.

48. The teams represented at the QFP meetings included: ITU test rig managers, the senior Development team manager and the Development team leaders/managers. Lionel would present the list of open peaks ordered by priority (A, B, C etc.). The senior Development manager would then ask the appropriate Development team manager to comment on current progress of the defect resolution. The ITU test rig managers would identify the negative impact that the peak was causing the test phase. Each PEAK on the list would be reviewed in turn with the output being an agreed date for the fix availability to the PIT team. This agreement was made between the Test and Development team. Peak priorities were reviewed and upgraded or downgraded as a result of the discussion held at QFP.

49. The QFP assisted the ITU Test team by keeping the focus on fixing the high priority defects. To determine if a test phase had completed, an assessment against a set of exit criteria would be made. The criteria used would include an assessment against defect priorities. An assessment of the exit criteria would determine whether a test phase had completed. Such exit criteria would typically include how open defects would be handled. For example, typical defect exit criteria used by ITU test stated there could be zero priority A or B defects and no more than 5 priority C, D, E or Z defects open at the end of the test phase. If such criteria was not met, the test phase would not be completed. After the QFP meeting concluded, Lionel chased the Peak fix deliveries and confirmed to the Test team when they had arrived with the PIT team.

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The Test team would liaise with the PIT and SPTS teams to confirm the availability of the fixes to the test team via the SPTS team. I do not recall any Post Office test representatives attending QFP meetings.

50. In July 2008 when I returned to POA, the HNG-X Release 1 Programme was no longer operating the QFP. About two months after I rejoined, Alan D'Alvarez and John Woods from Fujitsu Business Assurance were tasked with reviewing the HNG-X Release 1 Programme. Soon after this review completed, Alan D'Alvarez was reappointed to assist the HNG-X Release 1 Programme team. Shortly after rejoining, Alan re-instated the essence of the former QFP.

JOINT TEST TEAM

51. When I returned to POA in 2008, I joined what was known and referred to as the Joint Test Team. This team was based in Bracknell and consisted of around 75 people, around 25 of whom were Post Office employees. Fujitsu and Post Office worked together as a team to test the elements of the solution across the HNG-X test rigs. During the testing phases for HNG-X, there were regular governance meetings between Fujitsu and Post Office to discuss and resolve any issues.

52. The senior Fujitsu ITU test manager was Pete Dreweatt. Initially, I reported into John Rogers, the SV&I test manager. Peter Rickson was the V&I test manager. Pete was supported by two senior test architects, George Zolkiewka and Peter Robinson. George and Peter had been instrumental in identifying the HNG-X release test approach/test strategy and designing the HNG-X test rigs, how many rigs would be required, how the rigs would be equipped, and what test tools would be required.

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53. On the Post Office side, the senior Post Office test manager was Andrew W Thompson. Andrew Thompson was supported by Lee Farman who fulfilled a role similar to George Zolkiewka and Peter Robinson. Changes to the test strategy had to be reviewed by George, Peter and Lee. All three had to agree how to approach changes, but Lee had the casting vote as the customer's representative.

54. The Post Office team were responsible for the Quality Centre system. Fujitsu provided the platform and the network connectivity. Fujitsu provided the technical support in keeping the platform running. The Quality Centre application was administered by a Post Office team led by Gurjit Dhillion. Gurjit's team produced regular reports on test progress from the data that was accumulating in QC. These reports were shared by Gurjit with Andrew Thompson. After Andrew had reviewed the reports they were shared with Pete Dreweatt.

55. Chris Young and James Brett were Post Office-supplied test managers but Chris Young moved off the Programme. James was responsible for the Release Migration test phase known as Release Migration which used the RVMig test rig. As the HNG-X Release 1 programme made progress, James Brett took on responsibility for the Accreditation test phase known as RVACC. James also managed the Post Office team responsible for Counter Performance Testing which was a part of the overall Volume and Integrity test phase.

56. Both Pete Dreweatt and Andrew Thompson reported into Mark Burley who was the Post Office Executive Programme Manager for HNG-X Release 1. Pete was responsible for managing and maintaining the Joint test plan.

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57. The System Test team was staffed by Fujitsu-only staff. The Security test team comprised of one Fujitsu-provided tester and one Post Office-provided tester. Both these team members reported into a Post Office lead manager who was John Halfacre. The Security testers conducted their testing mainly using the SV&I test rig. Some of their testing needed to be performed on the RVMIG, RVACC and V&I rigs. Liaison with the test rig owners was required and planning needed to be co-ordinated to avoid disruption and ensure the rig was updated with code releases so that valid security tests could be conducted.

58. The Counter Performance Test team consisted of two Post Office supplied testers who reported into James Brett with a dotted line into me as test manager for the Volume & Integrity test phase.

59. For the duration of the HNG-X Release 1 Programme I observed the staff from Post Office and Fujitsu working together as one team in an amicable and friendly atmosphere of mutual respect. Both Post Office and Fujitsu had objectives to achieve for themselves and joint shared objectives to achieve. There were times when the Post Office staff met to be briefed on Post Office business and Fujitsu was not involved in these meetings. Likewise for Fujitsu, there were times when Fujitsu test managers met to be briefed on situations and scenarios which Post Office did not need to know or did not need to know until a trigger point had passed.

V&I TESTING

60. Within two months of joining the Joint Test Team, I became the test manager for the V&I test phase (around August/September 2008).

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61. In V&I testing, we identified a number of issues with the HNG-X solution design that needed re-working between the branch access layer servers and the Oracle databases.

62. It took the design team a while to work out how to resolve these issues. As a result, the original timespans for the pilots were extended. I recall that the pilot stayed in 'medium pilot' for a considerable while, involving 500 branches. The next step was to roll out HNG-X to a further 500 branches (1000 in total) but a decision was made to introduce branches more gradually, and the rollout was increased by 250 branches instead.

63. The V&I test team produced a number of test reports detailing the results obtained and the behaviour observed during the three separate volume testing cycles. The test reports detail the tests performed, the results observed, deviations from the test plan and the defects raised and how they were resolved and addressed. The document references and titles are:

    a. TST/SOT/REP/0008 – VOLUME AND PERFORMANCE TEST REPORT – PHASE 1 (WITN0476_01/6);

    b. TST/SOT/REP/0866 – VOLUME AND PERFORMANCE TEST REPORT – PHASE 2 (WITN0476_01/7); and

    c. TST/SOT/REP/0926 – VOLUME AND PERFORMANCE TEST REPORT – PHASE 3 (WITN0476_01/8).

64. The first two test reports above corresponded to the HNG-X Performance/Stress High Level Test Plan (TST/SOT/HTP/0003) (WITN0476_01/9). The third report above

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corresponds to the Counter Performance High Level Test Plan (TST/SOT/HTP/0008) (WITN0476_01/10).

65. Throughout the V&I test phases I worked closely with the Belfast UNIX, Wintel/NT and Database Administrators teams to ensure that incidents and operational issues that were impeding the test phases were resolved quickly. For example, DNS name changes / IP address changes could be resolved at agreed times or database partition table space could be extended so that we could reset a test and prepare another test run.

66. As we approached the final tasks for the V&I team, and these were being completed and ticked off, I had regular telephone calls with the Belfast operations team lead to keep him appraised of when the V&I test rig was expected to be handed over to their control. My recollection is that the final defect fix testing was performed against Release INT14.25 (Pre-release HNG-X Release 1).

67. The decision to relinquish control of the V&I rig was taken by the HNG-X programme managers. I provided confirmation that the V&I team had completed all of its required tasks. The HNG-X programme managers assessed and confirmed that the milestone of no further activities were required from the V&I test team / test rig. The achievement of this milestone confirmed the instruction to hand the V&I rig over to the Belfast Operations team.

68. I did not attend any of the meetings held by the Belfast Operations team and the Project Manager responsible for the transformation as they worked up the list of activities / tasks that were required to transform the V&I rig from a test environment into the Live Production environment.

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69. I was aware that the Belfast Operations team would perform the following tasks as a result of conversations with the Belfast Operations team:

a. The test only platforms that were part of the V&I rig would be disconnected from the network by network change to prevent them from accessing the Live Production environment or being used by members of the Joint test team to connect to any Live Production platform. V&I platforms were built with either a platform name prefix of "lprp" indicating a Live Production platform or "lvip" indicating a test only platform. Network changes were made to disconnect all platforms that had a prefix name of "lvip".

b. All V&I test team member MicroSoft Active Directory login accounts were to be deleted.

c. All test data created and entered into the BDB, BDS, BRSS, NPS, DAT data base platforms by the test phase was to be deleted/purged.

d. All test data created on the SSN and SSC platforms to be deleted/purged. These platforms were used by the testers to collect defect/incident evidence and transfer that evidence back into the POA corporate network for input to tools such as Peak / PinICL and QC.

e. Network configuration changes to disconnect the V&I counter estate.

f. Network configuration changes to enable the Live production counter estate to make connection with the VPX layer.

g. Cryptography/Key Management changes to enable the Live production counter estate to make connection with the Branch Access Layer (BAL platforms).

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70. The bullet points above are a sub-set of tasks that the Belfast Operations teams would have performed to create / enable the platforms in IRE11 and the standby platforms in IRE19 to be declared as ready for Live Productions operations. My recollection is that once HNG-X Live Operations commenced, the HNG-X release names changed from INT14.nn to HNG-X Release 1.0n and from that point defect fixes were tested using the SV&I test rig until the build of the LST test rig and the migration of the LST rig from the old Horizon to the HNG-X Release 1 solution had completed.

71. I remained the V&I test manager after the rig was passed to Belfast Operations. Initially there were only admin / tidy up tasks for me to do before the HNG-X Programme management team confirmed that the old Horizon test rigs could be decommissioned. With my SPTS manager responsibilities I was tasked with managing the dismantling of the Horizon rigs.

ISSUES WITH HNG-X

72. The V&I Performance Test Reports I identified earlier describe: tests that were executed; results obtained; Peaks raised; and performance data. The results are presented as graphic data.

73. The peaks raised against failed performance tests were assigned to the Systems Qualities Architects. Dave Chapman and Mital Unalkat were the architects that oversaw these performance tests. They assessed the results data and identified the fix resolution activities required with the help of other Architects/SMEs. Once fix resolutions were delivered and deployed onto the V&I rig, Dave and Mital would provide the test team with guidance on how to reset the rig for the failed tests to be repeated. After a rerun, the architects would analyse the results. Once they had

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completed their analysis, Dave and Mital would confirm the success or failure of a performance test. The same process was used for successful performance tests.

74. For the Integrity and Resilience non-functional testing, reports with the naming convention 'TST/SOT/REP/nnnn' were produced to detail the results of this test activity. My recollection is that failures were occurring in the systems monitoring alerting and eventing solution.

75. These defects resulted in a review that Alan D'Alvarez participated in that led to Fujitsu POA proposing that HNG-X Release 1 proceed into Live service and pass through a Post Office Acceptance Gateway with the risk posed by these monitoring/alerting defects being mitigated by Fujitsu POA providing additional man power to watch, monitor and alert if required any unexpected behaviour of the Live Production service. The Belfast Operations team then included additional people to provide manual monitoring of the Live Production service.

76. The decision to introduce HNG-X Counter branches in smaller numbers was to mitigate risk(s) identified during a previous pilot phase. The final decision on resizing the number of HNG-X Counter branches was taken by Post Office. My recollection is that Mark Burley and Will Russell were the main decision makers. I believe Will Russell represented the Post Office Service Delivery/Service Introduction team within Post Office.

77. I don't recall the start and end dates of each of the three pilot phases, nor the specific issue which arose from the pilot phases. I recall that the V&I test team conducted 25 consecutive days of volume/performance testing in January/February 2010. This testing was supported by Andy Thomas and Martin Tongue. After completing the 25

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days of testing the Peaks under test would have been confirmed as resolved/fixed. The details of relevant Peaks are included in the V&I Test Reports mentioned above.

78. I also recall that there were six Acceptance gateway reviews which were held jointly between Fujitsu POA and Post Office. My recollection is that the output/results from the V&I test phase contributed to the decision-making at Acceptance gateway 4, 5 and 6. I believe that the outputs/results from the SV&I, RVACC and RVMig test phases contributed to the decision-making at Acceptance gateways 1, 2 and 3. My recollection is that senior architects such as Dave Johns and senior Fujitsu Programme Managers such as Alan D'Alvarez and Vince Cochrane represented Fujitsu POA at the Acceptance gateway reviews.

79. I believe that each Branch migration pilot phase resulted in the results observed during the pilot phase to be assessed by Post Office and findings discussed with Fujitsu POA. I believe that each pilot phase review resulted in decision-making for the next action step. I believe that decision-making to proceed would have assessed issues, defects reported and still open, and risks that could be encountered by moving to the next pilot phase.

80. My recollection is that the relationship between Fujitsu POA and Post Office was pragmatic. To me, it felt like the Programme delivery finish line was approaching, there were issues to be resolved to make forward progress. I remember both organisations at the Joint Test Team level continued to co-operate with each other to overcome the difficulties. I believe we worked pragmatically together to complete the tasks assigned to the Joint Test team. In my experience, when compared with other programme delays, the delays encountered during the HNG-X Release 1 Counter

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rollout pilots were relatively short in duration. The delays were weeks/months compared against years.

Statement of Truth

I believe the content of this statement to be true.

Signed: GRO

Dated: 4th August 2022

Index to the First Witness Statement of Mark Andrew Ascott

	Description	Date	Control Number	URN
WITN0476_01/1	RS/POL/0003 (Version 1)	17 April 1997	POINQ0123668F	FUJ00117497
WITN0476_01/2	RS/POL/0003 (Version 2)	24 February 1998	POINQ0094160F	FUJ00087989
WITN0476_01/3	RS/POL/0003 (Version 3)	18 December 1998	POINQ0094164F	FUJ00087993
WITN0476_01/4	RS/REQ/012 (Version 3)	21 October 1998	POINQ0094162F	FUJ00087991
WITN0476_01/5	RS/REQ/012 (Version 4)	22 December 1998	POINQ0094165F	FUJ00087994
WITN0476_01/6	TST/SOT/REP/0008	16 November 2009	POINQ0123675F	FUJ00117504
WITN0476_01/7	TST/SOT/REP/0866	17 September 2010	POINQ0104133F	FUJ00097962

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WITN0476_01/8	TST/SOT/REP/0926	6 October 2010	POINQ0123676F	FUJ00117505
WITN0476_01/9	TST/SOT/HTP/0003	12 September 2008	POINQ0123669F	FUJ00117498
WITN0476_01/10	TST/SOT/HTP/0008	27 March 2009	POINQ0123674F	FUJ00117503