

Our ref RJT/3318/CM
Your ref —
Date 29 March 2018

The Chief Inspector
Navigation Safety Branch
Meridian Coastal Authority

BY RECORDED DELIVERY AND BY EMAIL

Dear Sir or Madam

KESTREL BANK — 15 MARCH 2018 —

1. We act for [REDACTED] formerly employed at the Corran Quay control facility, in connection with the occurrence of 15 March 2018 and the Branch's investigation into it. Our client has been informed that an isolation command recorded at 0200 UTC is attributed to his authorisation. He denies issuing that command and has denied it on every occasion he has been asked.
2. The purpose of this letter is not to make representations on the merits. It is to give you formal notice that the records listed in the Schedule to this letter are material to a matter in contemplation, and to ask that they be preserved.
3. We ask that no record described in the Schedule be deleted, overwritten, rotated out under a retention policy, returned to a vendor, reconfigured or destroyed until this matter is concluded. We are instructed that the ingest system at the facility operates a rolling ninety-day retention and that several of the items below will therefore be lost by ordinary operation on or about 13 June 2018 unless positive steps are taken.
4. We ask further that forensic images be taken of the items at paragraphs 1 to 4 of the Schedule by a competent person, and that a record of that process be kept. Our client does not ask for copies at this stage and does not ask to be present.
5. We should be grateful for your written acknowledgement within fourteen days, confirming that this letter has been placed before the investigation and that the Schedule has been actioned.

6. Nothing in this letter is to be taken as an admission, and our client reserves his position in full.

Yours faithfully

R. J. TAVENER & CO

SCHEDULE — RECORDS TO BE PRESERVED

- 1 The alarm and event journal for station CQ-03 for the period 0000Z to 0600Z on 15 March 2018, including all acknowledgements and the identity of the acknowledging operator.
- 2 The authentication and session records for terminals CQ03-T01 to CQ03-T06 for 14 and 15 March 2018, including sessions opened and not closed.
- 3 The register of inhibited, shelved and forced points in effect at 0000Z on 15 March 2018, together with the permit or authority under which each was placed.
- 4 The complete telemetry ingest archive for 14 and 15 March 2018 in its native format, unfiltered.
- 5 All records of remote or vendor access to the control system between 1 January and 31 March 2018, including support tickets, jump host logs and any shared or service account credentials in use.
- 6 The permit to work, isolation certificate and navigation warning relating to any planned or unplanned isolation of the Kestrel Bank node (KB-7), or written confirmation that no such document exists.
- 7 Door and card reader records for the control building for 14 and 15 March 2018.
- 8 Closed-circuit television covering the control room and the gate for 14 and 15 March 2018. We are instructed that retention on this system is approximately thirty days.
- 9 Shift handover records and the station log for the watches ending and beginning on the night of 14/15 March 2018.
- 10 The maintenance and defect history for KB-7 for the twenty-four months preceding the occurrence, including any outstanding defect raised and not closed.
- 11 Nightly backups of the control system server for the period 1 to 31 March 2018, and the archived programme for the node.

This letter is sent in duplicate. A copy is retained on our file.