

THE HONOURABLE RICHARD CHESTERMAN AO RFD QC, Commissioner

MR P. FLANAGAN SC, Counsel Assisting
MR J. HORTON, Counsel Assisting
MS A. NICHOLAS, Counsel Assisting

IN THE MATTER OF THE COMMISSIONS INQUIRY ACT 1950

COMMISSIONS OF INQUIRY ORDER (No. 1) 2012

QUEENSLAND HEALTH PAYROLL SYSTEM COMMISSION OF INQUIRY

BRISBANE

..DATE 22/03/2013

Continued from 21/03/13

DAY 9

WARNING: The publication of information or details likely to lead to the identification of persons in some proceedings is a criminal offence. This is so particularly in relation to the identification of children who are involved in criminal proceedings or proceedings for their protection under the *Child Protection Act 1999*, and complaints in criminal sexual offences, but is not limited to those categories. You may wish to seek legal advice before giving others access to the details of any person named in these proceedings.

THE COMMISSION COMMENCED AT 10.02 AM

ATZENI, DAMON ANTHONY called:

MR DOYLE: Mr Atzeni, do you still have your statement with you?---Yes.

Would you turn to page 174 of the exhibits?---Yes.

You were taken to this yesterday.?---Yes.

An email sent from Mr Cameron to you asking if you'd seen something and giving you a link?---Yes.

I think we established yesterday that it might have been an announcement about some service delivery and performance committee's report having been produced or provided?---Yes.

Do you recall reading that committee's report, if not the premier's announcement about it?---I recall not necessarily reading it at the time, and I'm questioning now whether I've actually been through it completely, although I was aware of the detail within it. People had given me snapshots of the information that was contained within it.

Do you still have volume 1 there with you?---Yes.

Would you open it to page 37 - actually, sorry, 35. You should have there a front page of a report from that commission - I'm sorry, I called it a committee before - dated March 2007?---Yes.

The part I want to ask you about is at page 50.

COMMISSIONER: Five oh?

MR DOYLE: Five zero. Under the heading Systems and Processes, can you read paragraph 31 to yourself? You will see that it includes a recommendation that there be as soon as practical a review of certain things, including on the risks to government, including the need to expedite the payroll solution for Queensland Health and Education Queensland?---Yes.

Whether or not you can remember other aspects of this committee's report, do you remember that being one of the things which you'd heard was the subject of their recommendation?---At the time, I don't recall that being the subject of the recommendation. Most of all it was more around the spend and the lack of delivery that I recall.

That is the size of the spend and the lack of progress?
---That's correct.

22/3/13

ATZENI, D.A. XXN

22032013 01 /JB(BRIS) (Chesterman CMR)

Thank you. You can put that aside. You were asked by Mr Flanagan yesterday about a meeting that you attended at IBM - - -?---Yes.

- - - where you talked about something about awards?---Yes.

Was it with a Dougal Ferguson?---Dougal Ferguson, yes.

You attended at IBM's request, was it?---Yes.

Can you recall the request came from Mr Cameron, was it?---Yes.

There were some other IBM people present when you got there?---Yes.

What was the subject matter of the discussion?---Around the Queensland Health Award. The detail of it I don't recall in detail, but we were only there for an hour. So I assume it was reasonably high level. Going into Queensland Health Award is quite in-depth and would have taken several hours.

Was it to identify as best you can in an hour the scope and complexity of the award regimes that Queensland Health had?---Yes. I believe we talked about where the award might fit best within Workbrain or within SAP, depending on whether it was pay-related or whether it was roster and schedule-related.

Anything else that you can recall?---Not that I can recall.

Do you recall having had a similar discussion with representatives of Accenture at any time?---As a client rep, we certainly discussed whether rostering should have all the award entitlements contained within it or whether that should actually be done secondary in SAP once the time data is actually captured. So it certainly was discussed previously.

Do you recall when?---No, not specifically.

COMMISSIONER: Were those discussions in CorpTech or in Accenture's offices?---They were within CorpTech. As I mentioned previously, I would meet with the rostering team within CorpTech on a regular basis, almost daily, and there was a debate within CorpTech at one stage where the award information should actually sit, whether it should be within SAP or whether it should be within Workbrain. It was deemed at that time to be sitting in SAP, because no-one else was going onto Workbrain.

MR DOYLE: I'm more interested in the discussions with Accenture, but it may be you're telling me the same. When you talk about discussions in CorpTech, do the discussions include the discussions with representatives of Accenture?---Yes.

22/3/13

ATZENI, D.A. XXN

22032013 01 /JB(BRIS) (Chesterman CMR)

Would it be right to say that you had discussed with them the detail of the nature and complexity of the Queensland Health Award's regime previously?---Yes.

So you would be satisfied they would be fully informed about those kinds of things?---They were aware of our needs.

Do you recall if you had similar discussions with Logica? ---I had no discussions with Logica.

Very good. Had they asked you for that kind of information, would you have had any difficulty giving it to them?---No, absolutely not.

COMMISSIONER: Accenture, am I right, was involved as a contractor in the implementation and planning of the HR roll-out in Queensland Health?---At CorpTech?

Yes?---Yes.

What was IBM's role, contractual role?---At CorpTech?

Yes?---Was to do solution assurance I believe, and manage products and the product vendors.

The product being SAP and Saba in Workbrain?---The Workbrain Saba RecruitASP and whatever integration tools were there.

It was a much more limited role than Accenture's, wasn't it?---Yes.

MR DOYLE: Is it right to say that with respect to Workbrain? Were you aware whether IBM had been engaged to manage the roll-out of Workbrain - and the expression used is end to end - some time before this meeting?---I wasn't aware of that, no.

Thank you. I wanted to take you to some documents towards your movements towards a contract, that is Queensland Health movements towards a contract, with IBM for changed management services?---Yes.

That topic. Can we start with your exhibits. They're almost all in the attachments to your statement. The first page I want you to go to is page 45. Do you have that? ---Yes.

Am I reading it correctly, it's an email of 4 February 2007?---Yes.

You'd obviously had some discussions with Mr Cameron before that about him doing some work for Queensland Health? ---Yes.

22/3/13

ATZENI, D.A. XXN

22032013 01 /JB(BRIS) (Chesterman CMR)

And that's of the kind we talked about yesterday?---Yes.

Is this an email about the process by which that can be achieved?---Yes.

He tells you to detail the QH resource requirement in an email and send it to someone at Treasury?---Correct.

22/3/13

ATZENI, D.A. XXN

Okay. And resource requirement, is resource the IT word used to describe people, the number of people you want? ---That's correct, yes. 1

Thank you. If you turn then to page 51, this is an email - I'm not necessarily sure that I'm going to be able to show you all of the documents that are relevant to this, but this is an e mail dated 3 March where you identify you need - or Queensland Health requires three change and communication resources, a senior implementation resource and 10 systems analysts for four months?---That's correct. 10

So you had by then at least identified what you thought you needed?---Yes.

All right, thank you. If you turn then to page 53, this one relates not to IBM but to Accenture and it seeks to identify needing 10 systems analysts for a period of four months from Accenture?---Yes. 20

Can you explain why that is so?---My understanding at the time was that we were getting - that was part of the control that we could actually draw from with Accenture. My understanding from sourcing and strategy was that there were certain resources that we could draw from certain agencies based on the original contract that was put in place. 30

To help you with what, to do what?---To help us with our implementation planning. 30

So they too were to provide resource to help you with change management. Is that correct?---That's correct.

Okay. What that as a result of some discussion that you had had with Accenture representatives?---Yes.

Do you recall who?---I believe it was with Chris Hubbard and Mr Simon Porter. 40

Can we infer it was before 3 April?---That we had had that discussion?

Yes?---I believe so, yes.

You were shown an email yesterday by Mr MacSporran which was in sort of latish March, inviting the opportunity to help you with your implementation. Did you follow that up with some discussions with Mr Hubbard and someone else?---I didn't personally, no, but I believe that was followed on. 50

Okay. Is the result that Accenture was to provide people to help you with Queensland Health's agency-specific requirements and change management?---That was the plan.

All right, thank you. Would you go next to page 55 of your exhibits? You have here an email from someone at Treasury back to you, dated 18 April?---Yes. 1

Telling you - you will see in the first sentence, "As mentioned", so I gather you had some conversation which preceded this?---Yes.

You don't need CorpTech to be the middle man, so to speak, for engaging contractors via something, and then going on to tell you what is required?---Yes. 10

Okay. So that you then understood, did you, the processes you could in fact negotiate and contract directly with the resource - - -?---Yes.

- - - IBM or Accenture without having to go through Treasury?---That was my understanding from this.

Thank you. Could I show you, please, volume 3. Can you open, please, at 447? There is an email at the bottom, dated 27 June?---Sorry. It's the back of the file. 20

All right?---Yes.

From you to Dennis Brown. Is he a Queensland Health person?---Yes.

Saying you want to progress a contract as soon as possible, and then his response was at the top of the page, "As discussed, the advice from CorpTech is that any use of the CorpTech head agreement would need to be under Queensland Health terms and conditions." That is consistent with what we have just seen, isn't it?---Yes, that's correct. 30

Be direct between Queensland Health and the resource and suggesting the provision of some document?---Yes.

Would you turn, please, to 448? Is this you sending the draft service agreement between Queensland Health and IBM - - -? ---That's correct. 40

- - - consistent with that suggestion?---Yes.

All right. Would you turn back to your exhibit, your statement now, please? Page 104.

THE COMMISSIONER: One hundred - - -

MR DOYLE: One hundred and four. 50

We have behind that email a draft of the service agreement. Do you see that?---Yes.

Did you prepare that or did someone in your office prepare it?---That was provided to me by Dennis Brown.

22/3/13

ATZENI, D.A. XXN

Right. So someone in Queensland Health produced it for you?---Yes. 1

If you then turn to page 134, we see that - and Mr Cameron says IBM is unable to accept some of those terms?---Yes.

The next page if you go to 135, at the very bottom of the page, there's an email from you to some other people. I assume they are all within Queensland Health?---Yes, that's correct. 10

Where you say in light of that response, "Where to from here?"?---Yes.

And there is some exchanges which I won't trouble you with but if you go to the email at the top, Mr Brown to Neil Glentworth - is that how it is pronounced?---That's correct.

And you, saying, "Go to tender. If IBM wish to respond to the tender, they must agree to the terms and conditions in part E of the response," so essentially calling their bluff and telling them the decision is made to go to tender. Is that right? The decision is at least identified to go to tender?---To go to tender, possibly, yes. 20

All right. If you turn then to the next page, you see another draft agreement - - -?---Yes.

- - - to Mr Cameron?---That's correct. 30

This is one which I assume Mr Brown or someone else from Queensland Health provided to you?---Yes, that's correct.

To give to IBM as your terms?---Yes.

Thank you. Is it right to say that you don't believe that was ever signed?---That's correct.

It just went into the ether as far as you can recall? ---That information had been passed across to IBM, I believe the next stage was where IBM said that they accepted those conditions - - - 40

Yes?--- - - - and from there, I left it with Mr Glentworth and Mr Brown to actually progress. I didn't write up those contracts.

Okay. That's not your function?---No. 50

This is all to do with IBM's provision to your resources for change management and agency-specific functionality? ---That's correct. Yes, that's correct.

Thank you. Now, if you go next to page 182 of your exhibits, I think. Just excuse me, I must have it wrong. No - yes, 183. You will see that you have been provided with something called a DETA requirement path, which is department of what ?---Department of Education Training in the Arts.

1

Can you just tell me, please, why it was - the requirement path was relevant to you?---So the requirements path is actually where we actually held the DETA requirements on our G drive, on our home drive and it was providing that detail to Nigel Hey, it was the DETA scoping and generally what we were doing the Department of Education Training in the Arts was working with, if they needed that information then certainly we would use that information and more.

10

Is that also relevant to identifying what your agency-specific requirements are or what your change management decisions may be?---Absolutely.

20

THE COMMISSIONER: Why wouldn't you ask for it from DETA itself?---At the time, we had a lot of requests that would go to DETA and they would take several days, weeks to actually get that information because they would go up through - - -

Was it quicker to go through IBM?---Well, it was available there, yes.

And quicker, I gather?---Yes.

30

And they had it because of what their contract with DETA - or least to provide services for the DETA roll-out?---I'm not sure why they actually had it but they had it available.

Would you presume, from your knowledge of contracts with the state, that IBM would have signed some sort of confidentiality agreement with respect to that information? ---The information was generally available within government and we were sharing that information - - -

40

But IBM's use of it, was it agreed - or don't you know?---I don't know that, Commissioner, I'm sorry.

50

MR DOYLE: Okay. How is it generally available though? 1
Can you explain the process?---Requesting amongst - - -

Between these agencies that are ultimately going to be the 10
customers of the shared facilities?---So CorpTech generally
hold that information on behalf of the agencies, but as
agencies, we talk quite a lot. So when I was client
representative, we actually developed quite a good
relationship with all the agency representatives and would
ask for this relatively freely amongst ourselves. We'd
share information with DETA as well.

Because they were a bit slow. Is that that - - -?---Yes.

I want to ask you - sorry to jump around, but I want to ask
you about now the ITO process. You can put your statement
aside. Now, if we go outside something that you can help
me with, just tell me, but you understand that an ITO
document was prepared and presented to the tenderers on
about 12 September?---That's my understanding, yes. 20

Have you ever read it?---Yes.

Have you read all of its attachments?---Not all of them.
I've read some of them.

If I were to suggest to you that the attachments include in
a section called Part G many tens of thousands of pages of
scoping data, have you read all that?---No. 30

You have some understanding I suppose though of the process
which was to be followed. Can I suggest to you that it was
one in which a great deal of information was intended to be
provided to the tenderers to inform them as fully as was
possible of the detail of the shared services regime. Do
you follow me?---Yes.

Of the existing developed software and, as far as one can
tell, of what the goals were of the process?---Yes. 40

In addition there was established a regime that if the
tenderers wanted to get any more information, they should
ask for it?---That's my understanding.

And it would be provided?---Yes.

And it would be provided to all of the tenderers whomever
asked for it?---Yes.

So if tender A asked for it, the answer would be given to 50
A, B and C?---That's my understanding, yes.

So the object of the process as you understood is was to
have the tenderers as fully informed as the government
could possibly make them of the details of the shared

services initiative, the software, and the programs it wanted to have implemented?---That's correct. 1

Are you aware of any decision to withhold information from the tenderers in relation to the shared services initiative, the software developed and the programs to be developed?---Not to my knowledge.

Thank you. In the course of the - sorry, the ITO responses were provided by 8 October. I'll tell you, you can assume that?---Yes. 10

You know there was an evaluation process after that?---Yes.

It's right to say in the course of the evaluation process, the roles in a sense were reversed. The panel was able to ask for more information from the tenderers?---Yes.

There was a system in place for that to be done?---Yes. 20

And questions were sent out to them, and responses were forwarded by the tenderers?---Yes.

Very good. There was an IBM Workbrain presentation to which Mr Flanagan took you on the date of 17 October, and do I understand you correctly to say you don't recall being involved in that meeting?---I don't believe I was there.

You don't believe - - -?---I don't believe I was there. 30

Very good. Could I ask you to go to volume 20, please. Can you turn please to page 531? You were taken to these yesterday?---Yes.

This is a scoresheet at least of the functional and business subteam of the evaluation panel?---Yes.

I want you to go to the next page to some comments, and I think it's right to say you said yesterday these were not your words?---I don't believe they are, no. 40

Okay, but I'm going to ask you something about them. If you go down to the fourth line, it says, "IBM approach to awards configured in Workbrain appears to provide a suitable alternative that should generate savings in both implementation and support effect." Then it says, "This has been demonstrated via reference sites. However there is still some concern that these do not reflect our complexity and size." It's the reference to "demonstrated via reference sites" I want to ask you about. Were you personally involved in making contact with reference sites to have something demonstrated?---No, I was not. 50

You're aware, are you, that there were some reference site information provided by IBM to CorpTech?---Yes.

Both in the ITO response itself and in a later clarification?---Yes. 1

You know, don't you, that someone was going to follow them up?---Yes.

But should we understand that it wasn't you?---No, it was not me.

Do you recall there being reported back to you in your subteam capacity that something had been demonstrated via those reference sites?---I don't recall it being reported back. 10

Doing the best you can, if the responses were provided on 8 October - and I'll ask you to assume the final report is 23 October - when along that process did you stop being involved?---After the three-day evaluation that we actually did at I believe 62 Mary Street.

Do you recall a date?---I believe it was the Monday, Tuesday, Wednesday between - - - 20

We can work that out?--- - - - up to the 12th I believe.

You were asked - - -

COMMISSIONER: Was there some reason you weren't involved after that?---I don't know, commissioner. I was there for the three - - - 30

Was it your choice or someone else's or just force of circumstance?---I thought that was all I was required for; for those three days.

MR DOYLE: So no-one called you up and said, "Come on back. We've got some more information" or something like that - - -?---No.

- - - that you can recall?---That I can recall. 40

In the course of the exchange with Mr Flanagan yesterday, you were in effect asked whether you had a predisposition against Accenture?---Yes.

You said something to this effect, that if Accenture had shown Queensland Health's risk being mitigated, it would have won the tender. Do you recall saying that?---Yes.

Explain to me what you meant by that?---Queensland Health hadn't actually moved anywhere on the Accenture time lines. It seemed that nothing - the risk wasn't really being mitigated to my satisfaction I guess from their response. However, if they had have highlighted that we were their 50

first priority or we were going to have some relief to our issue with payroll, then I think that they would have actually had equal opportunity to actually win the tender, in my view.

1

I understand; you're giving your view. So you, wearing your Queensland Health hat, were focusing upon Queensland Health's interest. Yes?---Yes.

Events (indistinct)?---Sorry, yes.

10

One of those concerns was the need to do something urgently, to overcome what you perceived to be the problems of the failing LATTICE system?---Yes.

20

30

40

50

60

And to accelerate its replacement?---Yes.

1

IBM offered that?---Yes.

And Accenture didn't seem to you to be offering enough of that?---That's correct.

Also yesterday you were asked something about the topic of the ability of Workbrain to deal with awards and as I recall your response, you said that this had been raised way before the ITO, was the language you used. Can you explain what that was a reference to?---Could you just ask the question again?

10

The ability of Workbrain to deal with awards interpretation and implementation?---Yes.

And you had said that that had been raised way before the ITO?---Yes, so I mentioned before that we were arguing whether - within CorpTech, whether SAP or Workbrain should hold the award interpretation information. Workbrain was already holding a portion of the award interpretation. The question was - - -

20

THE COMMISSIONER: Was that rostering?---Sorry?

Was that rostering or more than rostering?---It was more than rostering, more than what our current rostering product had. There were award rules, not just rostering rules. The argument was whether leave entitlements, allowances and those items should actually be within Workbrain or within SAP. Because Workbrain wasn't first and foremost as part of the CorpTech delivery, SAP was going to be the focus but it was still open to debate where they would actually sit.

30

Was that a CorpTech decision, was it, that SAP should be the - of the awards interpretation?---Certainly it was a discussion that was had within CorpTech, who was making those decisions. There were numerous consultants involved to have that discussion.

40

Had a decision been made to use SAP as the awards interpreter?---At the point in time that I was at CorpTech, it was - SAP was going to hold the majority of pay rules.

Thank you.

MR DOYLE: That's what I wanted to ask you, in fact. I have at least been - sorry, I will withdraw that. It's not the case that there is a clear division between Workbrain being used for rostering and Workbrain being used for awards. Even Workbrain being used for rostering incorporates some of the award rules. Is that right? ---That's correct.

50

22/3/13

ATZENI, D.A. XXN

60

That had been the case before anything to do with the ITO
arose?---That's correct. 1

There had been consideration within CorpTech of the
capacity of Workbrain to do that - discussion of it?
---Discussion of, yes.

And its capacity to communicate - to integrate with SAP in
doing that?---Yes. 10

You were involved in that discussion?---Yes.

Could I ask you to go, please, now to volume 27. Could you
turn, please, to page 22?

THE COMMISSIONER: What page?

MR DOYLE: 22.

Now, I have shown you a document called Roster Management
Workbrain Application Development Requirement?---Yes. 20

Are you familiar with it?---It looks familiar.

Okay. Is this the document that was produced as part of
the discussion that you were just describing which was
taking place within CorpTech?---Around the Workbrain
application development, yes.

Yes. We know at least - I will ask you to assume that it
was available at least very early in April 2007. Do you
know when it was in fact produced?---No, I don't. 30

Okay. How long had this discussion about Workbrain within
CorpTech had been going on before April 2007?---It was very
early on in the piece because it was pertinent to how
Workbrain was actually going to be developed and what the
integration points would be with SAP, how much integration
would be required so it was very early on in the piece. 40

All right. Could you turn, please, to page 29 of the book?
You should have a diagram there?---Yes.

I'm interested really in the left-hand side of it but does
it identify Workbrain and SAP communicating information to
each other?---Yes, it does.

The information being communicated is work detail export
and lead balances?---Yes. 50

And teams job families employee cost centres, whatever that
is?---yes.

Can you describe what is involved in that?---On the
right-hand side, the teams job families employees and cost
centres was the org management - or the organizational

22/3/13

ATZENI, D.A. XXN

management detail from SAP so what organizational team within the Queensland Health organizational structure where they actually sat within that tree, so it would be Queensland Health, a district, a hospital and down to a team. Then the job families would be are they a nurse, a doctor, an admin officer, an operational staff member. The employees of course, all of the employees and their details and the costs centres associated with those employees and where they actually sat within the organisational structure. 10

And that information is being provided by SAP to Workbrain?
---That's correct.

For what purpose?---So that Workbrain could actually position those individuals within a roster that they were associated with, so if they were within an ward, that they would then go an ward roster that matched.

Right. So this is a - - - 20

THE COMMISSIONER: Not an award; a ward.

MR DOYLE: A rostering-type function, if I can put it that way?---That's correct.

Thank you. If you can turn to the next page, please. Then it's headed HRBS, Conceptual Application Integration Map?
---Yes. 30

On the left, there is a heading Workbrain. Do you see that?---Yes.

And beneath it, various things which are identified?---Yes.

As things to be dealt with within Workbrain. Is that the way we should read it?---That's correct.

It includes leave annual balances?--- Yes. 40

And time in attendance information?---Yes.

Is that some part of the awards function?---It is. Leave accruals and balances is part of the award as is time and attendance.

Thank you. If we turn - - -

THE COMMISSIONER: They were descriptions of rostering, are they?---They are descriptions of rostering but the time in attendance is not just start and stop times as in what time you start, what time you finish. There is then the amount of time that is actually spent outside of those ordinary hours that would also be transferred across but to 50

determine whether they were outside of ordinary hours, you would actually need an award interpretation to determine that. 1

MR DOYLE: So this diagram describes at least that some of the awards interpretation is to be conducted within Workbrain?---That's correct.

In this document?---Yes.

And it shows, doesn't it, its functioning by being able to communicate freely that information to the SAP system? ---Yes. 10

Very good. Could you turn to page 38, please? You have got a heading Pay Rules?---Yes.

And then it says, "Groups of employees with a unique set of business rules applied to them, conditions based on award, employee type" and so on, lots of variables?---Yes. 20

It describes, doesn't it, further down, "Workbrain uses pay rules to process the award interpretation for an employee's timesheet" and so on?---Yes.

And so this is in fact the thing that you were talking about?---Yes.

The discussion within CorpTech of the capacity of Workbrain to apply awards interpretation?---Yes. 30

And to communicate it with the balance of the software system?---That's correct.

40

50

And the only debate at the time was just how much of the awards interpretation would be down within Workbrain?
---Yes. 1

But it was clear some of it was to be done?---That was certainly Queensland Health's hope right from the start.

Your understanding of what was being discussed within CorpTech at this time was just how much this would be?
---That's correct. 10

In the course of that discussion, do you recall a question coming up as to the ability of SAP and Workbrain to exchange data between themselves?---Yes.

Was it a topic considered by the various CorpTech personnel involved in this discussion?---Yes.

Did that include IT experts, people with - - -?---Yes. 20
- - - IT expertise?---Certainly SAP expertise and Workbrain functional expertise, yes.

So people who were in a position to know or find out - - -?
---Yes.

- - - were considering this topic at least by April 2007?
---Yes.

Discussing it freely amongst themselves?---Yes. 30

Seeking your views and telling you what their views were?
---Yes.

And producing a document which proceeds in the way we've shown on the basis that there can be communication between those two systems?---That's correct.

I have nothing further, Commissioner. 40
COMMISSIONER: Mr Flanagan.

MR FLANAGAN: Mr Atzeni, can I just take you back to the evaluation process with the ITO?---Yes.

You've already been asked about that by a number of counsel. Your best recollection as I understand it is that you were involved in the evaluation process for approximately three days. Is that correct?---That's correct. 50

That three days was spent at perhaps the Mary Street offices of CorpTech?---That's correct.

22/3/13

ATZENI, D.A. XXN
ATZENI, D.A. REXN

You were in a room with your subteam that was dealing with functional and business aspects of the tender. Yes?---Yes. 1

Can you tell us, prior to attending at Mary Street, had you read the ITO and part of the appendices to the ITO?---Had I read the ITO - - -

Sorry, responses?---Yes. Not the responses, no.

No, but you'd read the ITO before attending at Mary Street or was it at Mary Street as part of the evaluation process that you read the ITO?---I'd certainly read it at both. I believe I read it beforehand outside of Mary Street. 10

You were given for the first time the responses to the ITO when you attended Mary Street for the evaluation?---That's correct.

Those responses were in the room with the evaluation panel. When I say "the evaluation panel", I mean your subteam? ---Yes. 20

As you sit there, what's your best recollection of the actual dates that you were attending the evaluation process?---The 11th, 12th and 13th perhaps.

We've discussed the presentation by IBM of the Workbrain application on 17 October 2007. You stated you have no recollection of that at all?---No. 30

Correct?---That's correct.

If you were to leave on the 13th, it would seem at that stage that some scoring had been done at least. Correct? ---Yes.

For the three days that you were there on the evaluation panel, do you recall how many times you scored the responses of Accenture, IBM and Logica?---As in individually we went back and reviewed them? 40

Yes?---Is that correct?

Yes?---Twice I think.

I think you responded this way to Mr Doyle, but it's the case that you had no personal participation in contacting references which IBM had supplied to the subteam for the purposes of identifying the Workbrain application, working in real situations?---Yes. 50

Correct? When you left the evaluation - and I'll show you the documents but I've shown you them already. When you left the evaluation process do you recall whether upon the scoring that was available at the time, Accenture or IBM were leading?---At the time I left?

22/3/13

ATZENI, D.A. REXN

Yes?---I believe IBM were leading.

1

Can you recall whether at the time you left that the subteam had removed the words from the comments for the subcategories that "the proposal of IBM was high risk"?---I can't recall specifically those words being removed or being in there at the time. No, I can't recall whether they were removed at the time, Mr Flanagan.

Because if those words hadn't been removed at the time, you might appreciate that those words are only associated with the scoring that had Accenture ahead rather than IBM, and on the documents we have for the commission, the only time the scoring changes is when the IBM proposal is reassessed, if you like, the words "high risk" are taken out, and there is a reference as Mr Doyle took you to to the checking of referees. Yes?---Yes.

10

Doing it as best you can - I know it's a long time ago - when you left the evaluation process, where did the documents lie? I'll show you the documents so we're not guessing, but you'll need to compare both the scoring and the comments, but if I take you to volume 19, page 328 and 329, and if you also - get that first, also volume 20, please?---Page?

20

At volume 19 it's page 328, and at volume 20 it's page 531. If we look at volume 19 page 329 first, please, Mr Atzeni, which is a document I've already taken you to - - -?---21, was it, Mr Flanagan?

30

Page 328?---Two eight. Yes.

The scoring at that stage of the evaluation process for this particular subteam for functional and business was 3.16 for Accenture and 2.63 for IBM, and the comments in relation to the IBM approach over at page 329 is that, "The IBM approach is potentially very high risk." Yes?---Yes.

What I'm asking you is if you compare that then to volume 20 page 531, the scoring has changed whereby Accenture now is scored at 3.05 and IBM at 3.15, and for present purposes, the comment that my learned friend took you to where it's referring to the IBM approach, it's changed from saying, "The IBM approach is potentially very high risk" to "IBM approach to awards config in Workbrain appears to provide a suitable alternative that should generate savings in both the implementation and support effort. This has been demonstrated via reference sites. However there is still some concern that these do not reflect our complexity and size." Doing as best you can, when you left the evaluation after the three days that you'd been there, do you know where the comments at least stood? I'll put the question this way which might be more helpful to you. At

40

50

the time you left the evaluation panel, did you personally
or through others have any knowledge of referee sites
having been identified and contacted for the purposes of
being able to demonstrate that the IBM approach to awards
configuration could work?---I'm not aware of them being
contacted. I believe we had asked for reference sites.
As for demonstrated, I can't say that it was demonstrated
other than if information was provided to say that
particular reference sites - - -

1

10

20

30

40

50

60

THE COMMISSIONER: In the three days that you were involved in the evaluation, can you recall anything being brought to your attention that changed your assessment of the IBM proposal being potentially risky to being acceptable?---On than the questions that we had been asked - that we had asked, I believe had been answered.

1

As you can see in the documents, at one stage the IBM proposal was thought to be very risky?---Yes.

10

Or potentially very high risk. Later, that risk appeared to have been addressed in some matter?---Yes.

In the three days that you were there taking part in the evaluation, can you recall something happening to change the assessment - very high risk potentially to being acceptable? ---Not anything specific.

Have you any recollection at all of the changing?---I recall that we actually reviewed the scores.

20

I don't doubt that. It's this critical point that Mr Flanagan is asking you about?---Yes.

In the three days that you were there, have you any recollection of something being said or discussed or happening that changed the assessment of the IBM proposal from being potentially very risky to being acceptable? ---Not specifically, no.

30

MR FLANAGAN: You might be able to assist us this way then, Mr Atzeni; why did your involvement in the evaluation panel cease after the three days?---I don't know. I believe that that was the end of the process. I had awaited, I guess, the signatures for the evaluation. I can't answer that, I don't know.

All right. Mr Mander who was on your team appears from his evidence to have attended the 17 October 2007 presentation by IBM of the Workbrain solution which you have described as a game changer. Did you have any telephone contact with your team members of the business - functional and business subteam to keep you informed as to what was happening with the evaluation?---I don't recall a phone call at all.

40

All right. Can I ask you whether you have got any knowledge of this: have you got any knowledge that when the first referees or at least one of the first referees that IBM had identified in its response to a clarification question was not forthcoming in terms of talking about the Workbrain solution that operated in the specific business. Did you have any knowledge of that?---No, I don't recall there being a problem with that, as in I don't recall there being any problem identified.

50

Do you have any knowledge of IBM through Maree Blakeney being asked to provide one or two more references in relation to the operation of the Workbrain solution?---No, I don't have a specific recollection of that. 1

All right. And you have no recollection at all of attending a presentation by IBM for Workbrain?---No, I don't believe I did.

THE COMMISSIONER: Nor being asked to attend and not going for some reason?---I would need to check my diary, Commissioner, but I don't believe - I would have - I certainly would have liked to have been there. 10

MR FLANAGAN: We don't have any evidence of this to date but you were from an agency in the sense that you were from Queensland Health, you're not from CorpTech although you had been the client representative for CorpTech between 2005 and 2007. Was it ever explained to you by any person that agency representatives on the subteam evaluation panels would play a more limited role than the other members of the subteam who were, for example, from CorpTech?---No, I don't believe that that was explained to me. 20

May Mr Atzeni be excused?

THE COMMISSIONER: Yes. Mr Atzeni, that you for your assistance; you are free to go. 30

WITNESS WITHDREW

MR FLANAGAN: I call Jason Cameron.

CAMERON, JASON ROBERT sworn:

THE COMMISSIONER: Sit down, please.

MR FLANAGAN: Would you give your full name to the inquiry, please?---Jason Robert Cameron. 40

Mr Cameron, have you sworn or provided a statement to the inquiry which is 18 pages long and dated 18 March 2013? ---Yes, I have.

And together with that statement, have you provided a folder of supporting documentation which has been indexed which shows the paragraph to which that document relates in your statement, a description of that document together with the page number in the folder as well as the tender bundle page reference?---Yes. 50

Yes. Would you look at this statement and this folder of documents, please? Is that the statement that you have

22/3/13

ATZENI, D.A. REXN
CAMERON, J.R. XN

signed in these proceedings, Mr Cameron?---Yes, Mr Flanagan. 1

Are the contents of your statement true and correct to the best of your knowledge and belief?---Yes, they are.

I tender the statement and the annexures that goes with it.

THE COMMISSIONER: Yes. Mr Cameron's statement and the attached documents will be exhibit 31. 10

ADMITTED AND MARKED: "EXHIBIT 31"

MR FLANAGAN: Mr Cameron, you're presently employed by PricewaterhouseCoopers?---That is correct.

And you have been employed by that firm since 10 May 2010? ---Correct.

You're in the present of director in the advisory consulting group?---Correct. 20

Now, you had previously worked at Coopers and Lybrand from 1998. Yes?---Yes.

Which became Pricewaterhouse?---Yes.

Or became PricewaterhouseCoopers Consulting?---That's correct. 30

And thereafter, PricewaterhouseCoopers was acquired by IBM in 2002?---Correct.

And you worked for IBM as a managing consultant and ultimately left as a senior managing consultant in 2010? ---Correct.

Thank you. Now, according to paragraph 7 of your statement which you have in front of you, you were seconded to work at CorpTech in or about December 2005. Is that correct? ---Correct. 40

You remained there until early 2007?---I can't remember the exact time that I left CorpTech so it may have been early to mid-2007 but I definitely did start there around 2005 in December.

All right. I will take you to some emails shortly that might assist you in terms of the actual date that you left CorpTech?---Sure. 50

But whilst at CorpTech, can you just describe to the commission what role you fulfilled at CorpTech?---Sure. I was a manager of the HR VS solution for CorpTech and I was managing a group of Accenture employees and contractors in

managing their tasks and activities to a schedule to build that solution. 1

Now, in your statement you have outlined in some detail some concerns you had in relation to your role at CorpTech. Is that correct?---That is correct.

And particularly some concerns that you had in supervising Accenture employees?---Yes, that is correct. 10

Can I take you then to paragraph 14 of your statement? You say, "From early 2007, I recall doing some work at Queensland Health"?---Yes.

Then you say those sales was not generally a part of my job?---Mm'hm.

Can you explain to the inquiry why you made in paragraph 14 of your statement a reference to the fact that sales is not part of your job?---Yes. So there is general a couple of roles you can perform and one is a sales role and the other is a delivery role. My role at IBM was always a delivery role. 20

30

40

50

60

Why did you think that your role as an IBM representative at Queensland Health was a sales role?---Only in that - I was at the time a single employee with QHEST at the time and I was asked to provide - or the possibility of providing additional resources into Queensland Health to assist them with the implementation roll-out activities.

1

Is it the case that when you first went to Queensland Health - and we will come to the circumstances of that shortly - that you were the only IBM representative at Queensland Health?---Yes, under QHEST, yes, I was.

10

You ultimately had two other employees from IBM working there, did you not?---Correct.

Who are they?---A lady called Kate Hillman and another girl called Sarah Simpson.

When did they join QHEST?---I can't remember the exact date but it probably would have been a couple of months after I joined.

20

Quite. Did they join QHEST along with you for IBM in anticipation of that relationship being formalized through a Queensland Health service agreement with IBM?---Correct.

We will come to some of those documents but in short, the service agreement was never executed?---That's my belief that nothing was ever executed.

30

All right. But without a formal agreement as such, you were there at QHEST for some months or two or three months as a sole IBM representative. Is that correct?---Correct.

Now, given that you weren't implementing anything, you have referred to the fact that you weren't - that sales wasn't generally part of your job. What role did you actually fulfill at QHEST?---Okay, so there were a couple of roles. At the time, Queensland Health was working with CorpTech and they were running workshops called Impact Assessment Workshops and I was effectively used in that process because I had an understanding of the functionality of SAP. Also the build or what was the SAP solution for whole of government and also some knowledge around the other best of (indistinct) products that were being delivered as part of the whole of government solution, so they saw that as an assistance in being able to help them during that impact assessment workshop, identify requirements that were specific to Queensland Health and also as part of that impact assessment workshop process is to help identify within Queensland Health what processes, people issues or change management issues needed to be addressed as part of receiving the whole of government solutions so that's the assistance that I was providing.

40

50

Now, when did you first meet Mr Bloomfield?---Probably the first day he arrived at IBM and I can't remember what that date was. 1

All right. Do you recall whether it was in or around February 2007?---That is possible.

You knew he had previously worked for Accenture?---Yes, I did. 10

And you knew that his particular position in IBM dealt with, in effect, gaining more business for IBM through government?---True.

You became aware of his role fairly immediately upon him being appointed by IBM. Yes?---True.

All right. So in that sense, can you explain to the commission what role you saw yourself as having in terms of growing IBM's government business?---For myself, it was trying to build a relationship with Queensland Health so that we could actually assist them in their implementation roll-out activities. 20

You knew having been at CorpTech that there was a view that IBM, at least held by IBM, that IBM was under-represented in the Shared Services Initiative roll-out?---Yes.

And IBM had been the leader of a consortium that led to a contract in November 2005 for the suite of programs and software that were available for the roll-out. Yes?---For the products, correct. 30

And IBM's involvement with CorpTech was very much in relation to the implementation and duties and licensing agreements under that particular 2005 agreement. Yes? ---Correct.

Whereas it was Accenture that had the primary responsibility with CorpTech for the Shared Services Initiative HR roll-out?---That is correct. 40

And Logica had the primary responsibility for the finance roll-out?---Correct.

Now, when did Mr Bloomfield first tell you or explain to you that the approach of IBM would be to grow its business by taking over a greater share of the implementation of the Shared Services Initiative?---Yes. So I don't recall a conversation per se. In having read the bundles over the last week, there was a document of the - I think it was 12 March, the proposed conceptual model. 50

Yes?---I recall Mr Bloomfield providing me that document on the Friday afternoon and asking me to provide input into

that around current issues being - issues being - current issues, I can't remember the term, in the document. He asked me to provide some input into that document over the weekend and I returned that to him on the - I think the Monday. I don't recall any conversation prior to him asking me to review that document to provide input into it because I remember on that weekend, I wasn't too - I wasn't really understanding or sure of what he wanted me to do to assist him with that document.

1

All right. We will come to that document shortly and we will come to what you say were your involvement in it was. It would seem clear from the document that putting it on a generality, that document having been requested from the executive director of CorpTech through that document, IBM and Mr Bloomfield were seeking to grow the presence of IBM in relation to Shared Services Initiative roll-out at least in respect of Queensland Health. Do you agree with that? ---In respect to Queensland Health, I would suggest certainly within CorpTech. I know it referenced Queensland Health and indicating I guess an idea to help them with their implementation roll-out.

10

20

Now, may I then take you to paragraphs 15 and 16 of your statement?---Yes.

You actually give us some detail of how it was that you transitioned from CorpTech through to Queensland Health. Whilst you were at CorpTech between 2005 and 2007, there was a client representative of Queensland Health called Damon Atzeni. Correct?---Correct.

30

You met him in the course of your duties at CorpTech? ---Yes, that's correct.

And you formed what you describe as a normal professional working relationship. Yes?---Yes.

All right. You had things in common like children the same age and whatever. Yes?---Not at that stage, no.

40

Not at that stage, all right. Now, in relation to Mr Atzeni, did he at CorpTech seek your advice in relation to the proposed roll-out of the Shared Services Initiative in Queensland Health?---Not when I was at CorpTech.

All right. What was the nature of your communications then while you were at CorpTech?---At CorpTech, the only times I would liaise with Mr Atzeni from my recollection is that we used to have weekly or fortnightly meetings where members of the HR development team - so they would be functional resources, technical resources and myself as build manager, would meet with the client representatives, basically giving them an opportunity to discuss issues around progress, issues around functionality or potential changes

50

22/3/13

CAMERON, J.R. XN

60

to the products, so it was basically a weekly or fortnight status update meeting and that's where I met Mr Atzeni. 1

Just before we go on, what are your tertiary qualifications? Are they in IT or business management? ---Both. I have an IT degree from QUT and also a bachelor of business in accounting from QUT.

All right, thank you.

THE COMMISSIONER: Mr Cameron, can you explain to me, please, by what you mean by "build" and your role as build manager?---Sure. So effectively I was a - basically a project manager so when - I had a number of resources working under me and obviously their tasks were to build certain components of that system so what I would do is I would schedule those activities in an order to obviously make sure that we meet the time frames of implementation to be able to then push that through to the subsequent phases of the program, so through system testing, training and then roll-out, so there was - when I say "build", within SAP, there's configuration items and there is develop items and it's basically when you build and configure the system, it's basically to configure it to meet the whole of government requirements so we had a list or a series of requirements that were define and then I had to schedule those activities to the development team and make sure that they were meeting the deadlines of those deliverables.

10

20

30

40

50

60

Thank you for that. Tell me, why were you as an IBM employee during that role when Accenture had the contract apparently to develop and implement the HR solutions? ---Look, it's my recollection - I had a previous working relationship with Darren Bond that went back as far - back in 1997 where I, at Queensland Treasury, built a number of HR systems for Queensland Treasury, and I think he basically brought me on board because he knew my skill and would also, you know, provide him information, you know, through the normal reporting channels on how that build was proceeding, and I think it was from an element of trust I suppose.

So is this the situation: IBM was given a contract to assist Accenture with its contract?---Essentially. I mean, I guess I was just there to make sure that that build was proceeding, that if I saw any issues, I could raise those to his attention, which I did.

So really a project manager for the Accenture contract? ---Correct.

MR FLANAGAN: And part of the tension was that Accenture didn't particularly like you fulfilling that role?---That's true.

As a result of which you found yourself at, is fair to say, a loose end at CorpTech?---That is correct.

At paragraph 16, you don't seem to have a specific recollection of whether it was Mr Atzeni who asked you to come to QHEST or whether it was your suggestion that you go to QHEST. Mr Bloomfield wasn't on the scene at this time? ---Correct.

It was Mr Dunstan. Is that correct?---Yes, Mr Richard Dunstan.

From your own observations, how would you describe his interaction with CorpTech?---Mr Dunstan's?

Yes?---I don't believe they were fantastic.

Can you just expand on that for us for present purposes? ---I didn't see very many interactions with Mr Dunstan or any managers within CorpTech, probably only on. So he didn't have a great presence at CorpTech I don't believe. So I can't comment on why that relationship wasn't fantastic, because I didn't have those conversations with Mr Dunstan, but I just got the impression that it wasn't a great relationship.

Would there have been anyone - he was your immediate supervisor at the time, wasn't he?---Mr Dunstan was, correct.

22/3/13

CAMERON, J.R. XN

Did you have any conversation with him about you going to QHEST so as to - well, did you have any conversation with him at all about you going to QHEST?---I don't remember the conversation, but I assume I would have had one.

1

He would have had to give permission as your immediate supervisor at IBM for you to move from CorpTech to QHEST? ---Correct, yes. He would have had to have done that.

As you sit there now, can you recall whether it was you who suggested to Mr Atzeni or Mr Atzeni who suggested to you that you come and work at QHEST for two or three days a week?---To be honest, I just do not recall that conversation.

10

In any event, you do go to QHEST?---Yes.

You were given a desk where you worked two or three days a week - - -?---Mm'hm.

20

- - - outside Mr Atzeni's office, yes?---At first I in an open plan area with members of the QHEST team, and that was for, from memory, quite some time, and then Mr Atzeni moved into an office, and they had a reorganisation of teams, and then I had a desk outside Mr Atzeni's office, but I don't recall being there for very long until I went back to IBM.

When you say you went back to IBM, you went back to IBM to work?---To effectively start preparing for presentations to CorpTech.

30

Those presentations to CorpTech, are you referring to presentations that were done in or about July-August 2007 or earlier?---Probably July and August.

But up until July - and I'll show you an email shortly, but for around February to July you were at QHEST. Yes?---Not all the time.

When I say "at QHEST", I mean two or three days a week? ---Yes.

40

IBM paid you of course?---Yes, they did.

Was IBM being paid by QHEST for your services being there at QHEST two or three days a week?---I don't believe so.

Obviously there was no service agreement ever entered into with IBM which we discussed?---Yes.

50

But what was, if anything, the contractual arrangement between Queensland Health and IBM for your presence being there two or three days a week at QHEST?---None that I'm aware of.

So as far as Queensland Health was concerned, you were there or free?---Yes. 1

Do you know why you were there for free?---Effectively to help them with their implementation roll-out in the hope that we may get assistance or we may get a role in helping them out doing the implementation roll-out activity.

But as things progressed from February through to July, you became aware, did you not, that ultimately there was going to be a prime contractor model for the roll-out of shared service initiative, and it wouldn't simply be through CorpTech and Accenture. That is, there was going to be a change. Yes?---I think there was - I don't think there was a lot of information in that time and I think there was uncertainty from all parties about what was actually going to happen, and I think that influenced Queensland Health's activities, IBM's activities. I think there was just total uncertainty of what was happening with CorpTech. 10

Quite, but uncertainty creates business opportunities. I just want you to tell us from your own recollection now what part of your role was seeking or assisting Mr Bloomfield in seeking a better business opportunity than what had already existed for IBM in relation to the roll-out of the shared service initiative. He must have talked about it?---I'm sorry, I'm not really sure of your question. 20

My question is what was your role at QHEST and what part of your role at QHEST had the purpose of gaining more business for IBM in relation to the shared service initiative?---Yeah. So it was always trying to assist or I guess the idea was always to assist Queensland Health with their implementation roll-out, and that role really didn't change. That was what we were really trying to do, is basically get to a point where we could be an implementation partner or them, assisting them in their whole-of-government roll-out activities within their organisation. That was our plan. 30

That sort of roll-out has different sorts of strategies and different sorts of stages, doesn't it? It has planning, it has transition, it has implementation itself. What ordinary stages from your own experience would that involve?---For what we were trying to do at Queensland Health? 40

Yes?---Okay. So obviously in the first instance, it really was trying to identify what specific requirements Queensland Health had and identifying those to have that go through normal processes at CorpTech to either be included in the whole-of-government standard template or not. So that was early in that March period. Then that would obviously then go through normal processes a CorpTech. But 50

then the next stages would obviously then be to identify what processes needed to change within Queensland Health to take on that new system, what communications needed to be drafted and communicated with employees within Queensland Health, what structures needed to be put in place. So organisationally what structures needed to be put in place to take on that new system, what training impacts there would be on staff, and then once those had been identified and obviously then planned - so there would have to be a plan then to execute against, so it would be building and executing against that plan, and then obviously once the whole-of-government solution was then available, it would be then to operationalise that plan and execute against it.

1

10

Whilst you were at QHEST for those two or three days a week, did you have any personal knowledge of Accenture representatives meeting with QHEST representatives for the purpose of Accenture seeking to do exactly what you from IBM were there doing?---Yes. I was aware that QHEST were also talking to Accenture about potentially offering the same services.

20

As pointed out by the Commissioner, Accenture had the contract with CorpTech, did it not, for the roll-out of the HR initiative for the whole of government?---I'm not sure whether they had - I know they had the contract to obviously build the solution

Actually I put that badly. I withdraw that and put it this way. You knew that Accenture were the contractor that was working with CorpTech in relation to the roll-out of the HR solutions for the whole of government?---No, not entirely.

30

40

50

60

What was your understanding?---My understanding is that - I think at the time, my understanding was that agencies could seek assistance in an implementation roll-out and make their own decisions was my - what I knew at the time, or that is what I recollect. 1

All right, thank you. Now, can I take you to paragraph 18 of your statement?---Mm'hm. Yes.

You're dealing there with concerns that Mr Atzeni had specifically expressed to you about the Shared Services Initiative roll-out. Is that correct?---Yes. 10

Did he speak to you about his own experience with the CorpTech Accenture roll-out in relation to the Department of Housing? ---Yes, he did indicate concern. Housing was a very - was quite a simple roll-out. It - you know, the awards were simple, the solutions itself was quite simple. It didn't take into consideration rostering. That solution didn't perform well when it was first implemented and I think his concern was that it wouldn't scale for Queensland Health's size and complexity. 20

When you had these conversations with Mr Atzeni, would this be at the offices of QHEST?---Yes, it would be.

Just to give us some idea, this topic, was it covered between you and Mr Atzeni on a number of occasions or on one occasion or where there numerous conversations concerning his concerns?---I can't recall, to be honest, but I think it was probably only a couple of times. 30

All right. But would it be fair to say that by - through these conversations, you had a fairly good appreciation of QHEST and in particular Mr Atzeni's concerns that were being expressed in terms of a CorpTech Accenture roll-out for Queensland Health, both in terms of cost and time? ---Certainly timing. I'm not so sure about cost but I know that they were concerned because their LATTICE system - they were saying was coming - well, they were concerned that it was going to collapse at any stage and that they had a time frame for which they believed it needed to be replaced. 40

Yes. Now, can you just tell us what his primary concern was in relation to the existing LATTICE system. Did you observe it yourself in action?---No, I didn't.

All right?---No, I didn't. On the team within QHEST, there were what they called QSSP, the Shared Services Providers, so they were representatives from the Shared Services Provider on the QHEST team and they also basically in these impact assessment workshops would indicate, "Well, listen, there is significant manual remediation required weekly to make sure that people are paid correctly," that the system 50

itself would at times basically just stop - for what reason, I can't recall, but they indicated that there was a lot of manual intervention of remediation required weekly and that was costing them a lot of money.

1

Just so I can understand your position at QHEST, I appreciate you were doing some sort of scoping work but was there any part of that scoping work that required you to make inquiries in relation to the existing LATTICE system and the difficulties that were being encountered by Queensland Health in relation to it?---No, I didn't make any particular inquiries from my recollection, no.

10

All right. So that I can understand then, that's sort of informal scoping work you were doing there, was it more to do with the proposed roll-out - because if one is looking at scoping work, doesn't one look at what is existing and was coming?---A lot of that activity had already happened long before I even got to, say, CorpTech and I don't recall the periods because I wasn't there but obviously for a considerable amount of time, all agencies were involved in building the business requirements for the whole of government solution, and so that scope of work would have taken into consideration what functionality and business requirements were needed to satisfy all agencies for their payroll solution, so that would have happened some years ago, which obviously then got input into the requirements of what was built for the whole of government and then the specific impact assessment workshop process was only to identify additional specific requirements that were needed for a particular agency.

20

30

Mr Cameron, as part of his concerns expressed to you, did Mr Atzeni tell you that he believed that the payroll roll-out for Queensland Health needed to be brought forward?---Yes, I got that impression, yes.

All right, thank you. Can I take you then to 12 March 2007 report - - -?---Yes.

40

- - - which we will find in volume 27, Mr Commissioner, page 5? There is a new colour copy of it that you can use, if you wish?---Thank you.

Now, before you come to the document, can we just see what you say about this document which is at paragraphs 58 to 59 of your statement. "To the best of my knowledge, this document was largely prepared by Lochlan Bloomfield. I provided input that outlined challenges that were being faced by CorpTech at the time and amended paragraphs. So you outlined challenges that were being faced by CorpTech. When we come to the document, you might be able to identify what challenges you're referring to. At the time, an amended paragraphs, it is the suggested improvement section in the document - in the suggested improvement section of the document. Now, you refer to the fact that you had been

50

22/3/13

CAMERON, J.R. XN

60

able to refresh your recollection of that work from email since my interview with the commission." Do you see that?---Yes, correct. 1

These are emails that haven't been provided to the commission because they don't fall within particular request. Is that correct?---I'm not sure about that.

Sorry, do you know whether the emails that you're referring to, are they emails between yourself and Mr Bloomfield in relation to the drafting and corrections to this particular report?---Yes, they are. 10

All right, I see. Anyway, you have those emails?---I'm assuming they are in here.

You think they're - - -?---I'm not sure.

You're sure they are in here, all right?---I'm not sure they are in here but I do recall the emails. 20

I see, you're not sure they are in there, all right. But you have those emails in your possession if they inquiry would like to look at them?---Yes, I have seen them in a bundle - or a bundle.

Now, when we talk about the emails, how many emails are we talking about in terms of the drafting of this report? ---Probably two. 30

Two, I see?---A couple.

THE COMMISSIONER: If you ask for them, Mr Flanagan, Mr Doyle might give them to you.

MR DOYLE: I'm anticipating it. I'm just finding out where they are.

MR FLANAGAN: Yes, thank you. May we take it then I have requested them? 40

THE COMMISSIONER: Thank you.

MR FLANAGAN: On the face of this report - when I say "report", it's actually more a presentation document? ---Mm'hm.

But on the face of it, it seems to be a document that Mr Bloomfield has been requested by Mr Waite, the executive director of CorpTech to provide?---Yes. 50

Are you able to help us at all as to the surrounding circumstances as to how Mr Waite came to request of Mr Bloomfield this type of presentation?---I'm not aware of the context of how this was either asked for or proposed.

All right, thank you. Now, before we come to the report, when you refer to you gave some input as to the challenges that were being faced by CorpTech, what were the challenges at the time that CorpTech were facing?---Particularly around development time frames and so things were taking a lot longer to develop than what had been previously scheduled so there was going to be significant delays to the schedule across the board.

1

Was that the primary concern in terms of delay?---I believe so.

10

Did you know anything about cost blow-out?---Not specifically. I wasn't aware of any, you know, numbers of how much it was costing - - -

Quite generally?---Generally, yes, I would know there would be a cost implication of those blow-outs.

20

30

40

50

60

Yes. Thank you. May I first take you to page 6 of this document?---Yes. 1

It's a document that's of course dated 12 March 2007. The first paragraph refers to recent changes in the SS program relating to in particular Queensland Health and the Department of Education, Training and the Arts. Can you shed any light on what your knowledge was of those recent changes?---No, I can't. 10

Did you have any conversations with Mr Bloomfield that there was a new opportunity, if you like, for IBM to increase its presence in relation to the shared service initiative roll-out?---No, I can't recall the conversation, and to be honest, this is my first time where I saw this as being a proposal. So I don't recall any conversations prior to this with Mr Bloomfield about that.

In your role at IBM prior to this proposal, had you ever participated in the editing or creation of a proposal? ---Which proposal, sorry? 20

Of any proposal?---Not - with regard to shared services.

Yes?---I did attend a meeting in the 2005 presentation to the government around the offering of the software proposal and also I think we also put in a proposal to take on the lead build role. I did attend a presentation back at that time. 30

Do you recall when that was?---No, not other than it was in about the 2005 period.

Thank you. If you look under item 1 where it says "release schedule"?---Yes.

It says, "The cessation of vendor support in mid-2008 for current HR business systems within QH and DETA necessitates an immediate reprioritisation and reschedule to the current CorpTech release plan"?---Mm'hm. 40

It would seem that you would have known at least from Mr Atzeni that vendor support was going to be withdrawn from Talent2 in or about June 2008. Yes?---That's correct.

Is this information in this part of it at least something that you had gleaned from Mr Atzeni or was it known to you and Mr Bloomfield otherwise?---I think this was pretty common knowledge throughout both Queensland Health and CorpTech. 50

Can I then move to page 7? If you look at item 3.2, it says, "Queensland government agencies are actively engaging IBM to assist in their planning for an SSS implementation"?---Mm'hm.

From your own knowledge, which Queensland governments were actively engaging IBM?---The only two that I'm aware of - and I don't know how the communication came about because it wasn't through me, but I am aware that we presented to DPW and also Department of Emergency Services. 1

When you say you presented to those two departments, you were presenting to do what for them?---With the Department of Emergency Services, it wasn't I don't think to assist them in their planning for a SSS implementation. I can't recall what product, but I think they were engaging or they were looking at implementing it was either a learning management system or they wanted to know more about rostering, and they were looking to find out information about those products. So I don't believe it was around planning to help them or assist them in SSS implementation. With DPW - and I think that this was later in the piece, I did attend a meeting with a number of other IBM personnel where they were talking about implementation, partnership, roll-out, and I don't believe anything else happened after that meeting. 10 20

Thank you. Is it at all a reference to Mr Atzeni inviting you to come and work two or three days a week free of charge to Queensland Health at QHEST?---I'm not sure.

Apart from the word "engaged", because that would suggest a commercial relationship, but IBM through you at least before the other two IBM people came on board, you at least were assisting Mr Atzeni and QHEST in Queensland Health's planning for an SSS implementation. Yes?---Yes. 30

So we should understand part of that sentence, apart from that word "engaged", as referring to you being engaged by QHEST. Yes?---Yes.

Then if I could take you to page 8. Having participated with Mr Bloomfield in editing and adding to this particular presentation, you must have known the purpose for which you wanted to present it to Mr Waite. What was he trying to achieve?---Trying to achieve I guess some broader representation in the shared service initiative of CorpTech. 40

At page 8, did you have input into any part of the information on this page?---On page 8?

Yes?---Yes, I have.

What parts?---Number 5, number 6, probably a part of 7, and probably not 8. 50

So the whole of 5, the whole of 7, part of 7 and not 8, yes?---Probably part of 5.

Part of 5?---Yep.

22/3/13

CAMERON, J.R. XN

We know that the presentations previously reported on the fact that vendor support or LATTICE was to be withdrawn in June 2008. What's being contemplated in paragraph 5 is what needs to happen to realise a mid-2008 go live date for QH and DETA, and "to also meet subsequent delivery schedules for the other agencies it is imperative that appropriate technical and integration leadership be applied across the application development team structures." So what's being looked for here is a significant involvement of IBM I that process. Yes?---I believe so, yes.

1

10

Part of that in item 6 was the delivery of a complete Workbrain solution by late 200y for Queensland Health? ---Yes.

From this presentation, that was to be achieved by IBM. Yes?---Yes.

20

30

40

50

60

Then from there, may I take you to page 9 item 1? What's being suggested here is a three-cornered relationship between CorpTech, Accenture and IBM. Is that correct?
---Yes. 1

You've read this presentation recently again, haven't you?
---Yes, I have.

Can you just explain to us what part of the three-cornered partnership was to involve Accenture and what part was not to? Sorry, when did it stop?---Sorry? 10

When was it to stop in terms of the three-cornered partnership?---I think it was planned to go all the way through.

I see. Can you explain how?---From brief recollection, I think it was where it was seen that Accenture provided value, they should continue on providing those services, and where IBM provided value, it would take on that role and also was looking toward I guess having some representation on program management and governance structures which they didn't have. 20

So where was Accenture - because you've read this document, you can tell us, and you were one of the editors at least or authors of this document. Where did Accenture add value in this process contemplated by this presentation?---I'd have to refresh from the document, if that's okay. 30

That's fine?---Obviously Accenture had the role in developing the HR payroll solution for SAP, and we didn't have that capability, and it would have slowed the project down more than what it was if we took on that role. We did have skills in the Saba, RecruitASP and Workbrain spaces, and we were providing a number of resources in that area and had the relationship with those vendors. At the time, we didn't have I guess a great - what's the word? We didn't control those work streams from my memory, but we did provide resources in that space. So we felt the vendors weren't being utilised enough to help get those products over the line. So that's where we thought that we would be able to provide value there. IBM didn't have any representation from what I recall in any of the integration or these roles on page 10, sorry; integration, technical coordination, testing or data migration areas, and certainly no representation in any project management group. So we felt that we could provide CorpTech with a better option of owning or building or taking control of the Saba, RecruitASP and Workbrain streams, but in being able to do that or being able to be successful in doing that, take a more integrated role across the program, and I guess representation in the project management group. 40

Then at page 10 since we're on it, you will see there's key features about proposed conceptual model, "As IBM has the 50

best relationship and working knowledge of the Saba, RecruitASP and Workbrain products, we propose that IBM takes responsibility for each of these application development teams. Accenture would continue in its role in the SAP team." Yes?---Correct.

1

This is in relation to what stage of the implementation? Is it at the planning stage, at the management stage or what stage is it at?---Sorry, do you mind if you repeat the question?

10

Yes. I'm just trying to work out, in terms of this relationship, is that for the final implementation stage, like all stages leading up to the go live date?---My understanding is that this point from a HR perspective, it would be around about the time that Housing just went live, and that the schedule was going to continue for however long; another year, two years. So I guess this proposal would be to change the current working structure of CorpTech to continue with the roll-out or the continued build and roll-out of this solution over the course of the remaining roll-out schedules.

20

Can I take you to page 11 then, Mr Cameron, which deals specifically with Queensland Health?---Mm'hm.

What input did you have in relation to that section on Queensland Health, and for present purposes, I'm only interested in what's on page 11?---Sure. I didn't write that section.

30

Thank you. Can I take you to it though?---Sure.

Because in the second paragraph it says, "Whilst IBM believes that a similar conceptual model outlined below for QH could be applied to DETA, we have focused on QH due to our knowledge of the agency requirement." That reference to IBM's knowledge of the agency requirement, what knowledge did IBM have of QH's requirements at that time? ---It could have only been the requirements that were gathered as part of the whole of government, which was for the whole of government template, and any work that I was doing in there around the impact assessment workshops.

40

So you had been sitting in on the impact assessment workshops at QHEST?---Some, but not all.

Shall we take it that that's a reference to in effect your knowledge of Queensland Health's requirements?---Yes.

50

"IBM have been liaising with QH, and we have a very good working knowledge of their implementation plans." Again is that based on what Mr Atzeni had told you? Sorry, when I say Mr Atzeni had told you - - -?---QHEST.

- - - what QHEST had told you, including Mr Nigel Hay, the director?---Nigel and also the QHEST team. Correct. 1

"In fact we have been actively contributing to them in recent times." That's again a reference, is it not, to your role at QHEST? Yes?---Yes.

It would just seem that your role at QHEST is being used as a fairly central sales point or sales pitch to Mr Waite. Would you agree with that?---Yes, based on those words. 10

Yes, and I know you didn't write them, but you would have read them at or about the time. Yes?---Yes.

Just a more general proposition, was part of your role having been placed at QHEST - whether it's at the request of Mr Atzeni or whether it's you deciding to go there through a direction from your superiors - wasn't part of you being there to bring about a presence of IBM at Queensland Health so that IBM at least had its foot in the door? I'm not suggesting there's anything wrong with this for a minute, because business is business, but IBM got their foot in the door to seek a greater share of the shared service initiative roll-out?---Certainly the way I saw it at the time was that we had minimal involvement at CorpTech, and I saw my role at the time at Queensland Health, certainly in my eyes, to be involved with their implementation roll-out. That was my, I guess, goal; personal goal. 20

That's your goal?---Sure. 30

But you knew that Mr Bloomfield was identifying your role there in a slightly different or characterising your role there slightly differently, wasn't he?---Reading this document, correct.

Then if I could take you to paragraph 3 there, it says, "IBM strongly believes that we are able to cover all relevant aspects of the implementation including payroll"? ---Mm'hm. 40

You had told us that payroll was, in terms of Accenture adding value, Accenture had the experience with SAP and the payroll roll-out at least for Queensland Health. Yes? ---Yes.

But what seems to be contemplated there is that, "IBM strongly believes that we are able to cover all relevant aspects of the implementation including payroll." Was that your belief at the time?---I think what he's saying here or what he's trying to imply is that from an implementation roll-out perspective, we understand what the payroll solution is providing, and would be able to assist them in being able to roll out that payroll solution, not in a build capacity. 50

He goes on to explain why this is; he says:

1

Including payroll as the work in the agency does not require a details knowledge of the SAP configuration and customisations. In fact, due to our detailed understanding of rostering and the Workbrain solution, we are best positioned to help Queensland Health to determine how SAP payroll will be implemented across the agency. We believe that Accenture knowledge is best leveraged with CorpTech and they should not be distracted by agency-specific implementation issues.

10

Now, what is meant by that?---I think what he is saying is that - okay, so we understand payroll, we understand Workbrain which would mean we are in the best position to be able to assist them in determining what the processes or certainly from a change management perspective on how to roll those products out within Queensland Health and basically to say, "Look, if Accenture should continue with the build within CorpTech of that product."

20

So if Accenture was to continue with the build of that product in CorpTech, what role would it give Accenture in that Queensland Health payroll LATTICE replacement and rostering?--Well, within CorpTech, they would still be building the HR payroll product within CorpTech and at that stage, they were still - my recollection is that they were still leading the Workbrain team in developing the Workbrain solution.

30

All right, thank you. Can I take you to page 13? The document identified that IBM would be the HR and finance implementation manager. Yes?---13, sorry?

Yes?---Yes.

But it refers there a conceptual model in item 1, our conceptual model proposes the appointment of a QH manager to be co-located with CorpTech application development team. Yes?---Yes.

40

Did you have any particular person in mind for that role?---I'm sorry, I didn't write this so I'm - - -

You didn't discuss with Mr Bloomfield who, from QH, would be an appropriate QH manager to be co-located with CorpTech application development team?---No, I don't believe I did.

All right, thank you. Just while we're on this; can I just ask you to go to volume 3, page 168? It's an email dated 30 April 2007 at 9.35 am from Mr Atzeni to yourself?---It just says, "FYI Damon".

50

Yes. FY CV?---Yes.

22/3/13

CAMERON, J.R. XN

60

Do you have any recollection of receiving a CV from Mr Atzeni in April 2007?---No, I don't. 1

Do you have any recollection of Mr Atzeni approaching you, saying his brother was looking for a job with IBM?---No, I don't.

You don't?---No.

And Mr Atzeni forwarding to you his brother's CV for the purpose of you seeing if you could get him a job at IBM? ---I don't recall that, no. 10

None at all?---No.

All right. Do you have any recollection of attempting to get a job for Mr Atzeni's brother at IBM?---No.

No, that's fine; thank you. You can put that aside. Madam Associate, could you fix up that folder, please - - -?---I'm sorry. 20

- - - because we will be using it?

MR DOYLE: Can I take this opportunity to respond to the request for some documents?

THE COMMISSIONER: Yes, thank you.

MR DOYLE: They are helpfully provided in the tender bundle at volume 33 at pages 11, 18 and 29, we think. 30

THE COMMISSIONER: Thank you.

MR DOYLE: And they were provided on 6 March.

MR FLANAGAN: Can I take you back to the 12 March 2007 report, and in particular, could I take you to paragraph 18 and item 4? 40

THE COMMISSIONER: Page 18?

MR FLANAGAN: Page 18, item 4?---Sorry, Mr Flanagan - sorry, I've found it. What page?

Page 18, item 4?---Yes.

Now, just dealing with this page, can you recall what parts of this you wrote?---I don't believe I wrote that. 50

All right. What has been suggested is that CorpTech and IBM must be sufficiently and appropriately engaged with the department to allow for roll-out activities to be identified, planned, resourced, executed and delivered as required. Then what is identified then at the second

dot point is that IBM take responsibility for the QH implementation. After approval from Darrin Bond, IBM has been liaising with QH in the recent

1

months. Now, that would suggest that Mr Bond had actually released you from CorpTech or had in some way approved you to leave CorpTech and go and liaise with QH. Was there any such formal arrangement between you and Mr Bond?---Not that I'm aware of, no.

10

No. Do you know where that information came from?---No, I don't.

Thank you.

Assisting then with the implementation planning activities, we believe we can add significant value to QH implementation if IBM is engaged before this implementation because we have a very good relationship with QH management within the implementation team, eg. Nigel Hey and Damon Atzeni.

20

That's again a reference to your relationship with them?---Correct.

We have a very good understanding of the product suite and the role of an implementation challenges across the suite are referenced to the November 2005 that an IBM led consortium had?

30

---Yes. That would be Workbrain, RecruitASP and Saba.

Yes, thank you.

THE COMMISSIONER: Sorry, I missed that answer?---Sorry. Yes, that would be the products Workbrain, RecruitASP and Saba.

Thank you.

40

MR FLANAGAN:

We have a very good understanding of how QH is structured and the unique challenges of this agency that can be more general knowledge rather than just your specific knowledge through Mr Atzeni and Mr Hey?

---I'm not sure what that's referring to. I mean, that could be referring to a number of things, I suppose.

50

All right, thank you.

We could take responsibility for this implementation, reducing CorpTech's risk.

Yes? What does that envisage in terms of IBM's role then if IBM was to take responsibility for the Queensland Health roll-out or implementation?---I'm sorry, I don't know what he would - what he would be referring to there. 1

It would seem though on its face that the proposal was for IBM to take primary responsibility for the implementation not just of Workbrain or the Workbrain solution of Queensland Health, but also for payroll and including the latter's replacement, and finance, with a go live date as at or about mid-2008. Yes?---I still read this as being helping them with the implementation roll-out within Queensland Health and not building a solution for them for that period. That's the way - I certainly didn't think we were contemplating anything greater. Certainly in my involvement with Queensland Health I still see this as being a - we could basically do the implementation roll-out for them and not the build. 10

20

30

40

50

60

Right. So should we understand that document as IBM seeking to fulfil that role rather than actually carry out what you call the build?---Correct.

1

The only difficulty I have with that proposition, though, is this: the specific reference to a go live date in mid-2008, which as a matter of commonsense is referable to the concern of Mr Atzeni or the concern of QHEST identified in the report, namely that vendor support would be withdrawn by June 2008. So it would seem that for a go live date - and the language of go live would suggest a build prior to mid-2008, does it not?---It does.

10

So how do we understand that document as being simply for implementation and not the build?---Because I think what he's referring to here is that there'd have to be significant change within CorpTech under the model that he proposes, so IBM to have a greater involvement in the RecruitASP (indistinct) and Workbrain products for Accenture to take on the SAP build or continue with the build. Finance was already - in my understanding was effectively built, but I'm not sure whether for Queensland Health's specific requirements.

20

Yes?---And I would take this as being we would basically partner with Health to perform the implementation within the organisation but CorpTech would have to - the proposal was for CorpTech to be restructured; the Queensland Health be brought forward in the implementation roll-out plan; focus would have to be on completing that build within CorpTech and this proposal would be then for IBM to roll it out within Queensland Health.

Right?---That's the way I read it.

I see. Thank you. May I take you then to volume 3, which has probably been fixed by this?---Thank you.

30

Pages 69 and 70. Now, I didn't show you specifically, but in the 12 March 2007 document - in fact, we've shown you this before?---Yes.

Indicative pricing is referred to as not being provided in that document, but might be provided if requested?---Mm'hm.

The indicative pricing referred to in the 12 March 2007 document is for Queensland Health and DETA, but it would seem that on 16 March, which is some four days after the report or the presentation, you provided certain indicative development estimates to Mr Hey and Mr Atzeni of QHEST. Is that correct?---Yes, it is.

40

All right. Now, can you just tell us from your own recollection the circumstances in which you came to be requested to provide those estimates?---Yes, my

recollection is that Mr Hey, I believe, asked me to provide an estimate of what it would cost from a budget perspective because they were considering removing themselves from CorpTech and deciding whether it was an option for them to go alone. 1

Yes. And in your statement you refer to that there was a general feeling that Queensland Health wanted to go alone. Yes?---I know they were considering it as an option, but I also thought that they would consider that quite risky.

Even if they thought it was risky, was part of your function at QHEST to assist in positioning IBM, that if Queensland Health decided to go it alone they'd be using you and not Accenture?---No, I had no conversations with them to that effect. They did ask me for this and then I don't remember what they chose to do with this information. 10

Did you had conversations with Mr Bloomfield to that effect?---All I know is I would have had to have run this past Mr Bloomfield, but I don't recall any other conversations with Mr Bloomfield around it.

But see, if someone wants to go it alone - and we've heard from Mr Atzeni that if one was going to go it alone you would have an IT department who would roll out and implement - - -?---Yes. 20

- - - the project because within Queensland Health itself you agree they didn't have that sort of expertise. Yes? ---True.

So if they were going to go it alone and there was a view that the shared service initiative was failing because of the experience with the Department of Housing; that it was over budget, that it was over time; wasn't part of your role to assist in positioning IBM that if they did go it alone, it would be with IBM? It's not a startling proposition, is it?---No, it is not a startling proposition but I don't think it was ever really discussed post - they wanted to understand what options were available to them. We obviously provide these figures and no further conversation was entered into, from my recollection, around them pursuing that as an option. 30

You knew what Mr Atzeni thought of Accenture, though, didn't you?---I know he was very disillusioned with CorpTech and Accenture. Certainly the way the model was working, yes. 40

And he had this real concern and there was a concern that we don't doubt for a minute he validly and honestly held. He had a concern that if the roll-out at Queensland Health happened according to the timetable and with the resources of CorpTech and Accenture, that there was a real risk

associated with that. Correct?---I can't remember where they were in the implementation schedule time frame but I know he held a concern that that wouldn't reach the time frame for Queensland Health, obviously, because of the concern around LATTICE. I know he wanted to bring that schedule forward. I don't know what happened there.

1

Yes?---Sorry, what was the rest of your question, I've forgotten.

You knew that if you were to go alone, Mr Atzeni's first choice and Mr Hey's first choice would not be Accenture? ---They didn't indicate that to me.

10

Now, is it fair to say if someone request you will this type of pricing schedule that they are looking at, at least at that stage, what it's going to cost for the roll-out onwards to a go live date. Yes?---I can't recall whether the specific request was around just what it would cost to develop or whether it was cost to develop and implement. I can't recall.

Now, who did this pricing? Because you must have had - did you do it by yourself or did you have others to assist you from IBM?---Others would have had to have assisted me because I wouldn't be able to - particularly the Workbrain components, I wouldn't be able to scope those at all.

20

No. When was the request made by Mr Hey?---I don't know because I don't have any access to my emails so I wouldn't be able to reflect when that particular request was made.

All right. Can you tell us this, at least: was the request made before or after the 12 March 2007 presentation?---I really don't know.

30

Right. This might assist you: how long did it take you to compile this indicative pricing?---I'm not sure how long it would have taken but it would have taken a while.

Are we talking days or weeks?---Certainly wouldn't have had to have been days, probably over a week, I would suggest.

Now, it's indicative pricing of what it would cost Queensland Health if IBM was to roll out the proposal, the shared services initiative of Queensland Health. Yes? ---Yes. So this was to basically take on still the whole of government solutions as they were provided at that time and to develop their specific requirements, particularly around SAP.

40

For Queensland Health?---Yes.

All right.

THE COMMISSIONER: That is just the payroll part, is it? 1
---I will just have a quick look. So it says the
first item says, "SAP custom development," and so that
estimate there included estimate for out of scope
developments required for Queensland Health as documented
in a list so I guess to provide example, this was still
then receiving the whole of government solution from
CorpTech and it was an estimate just to deliver the items
that weren't included in the whole of government solution 10
that they had identified as needing to be developed to meet
their specific requirements.

MR FLANAGAN: Now, I don't think I will bother with
exercise but I have asked for it to be brought to your
attention; the indicative pricing here was around
\$19.6 million. If we were to look at IBM's pricing
schedule in response to the ITO, we don't come across any
sort of figure such as that for the implementation of
Queensland Health but there are a number of fixed-priced 20
items on the pricing schedule for various stages. It's
the case, isn't it, that one cannot possibly reconcile or
indeed I will put that differently - do you agree that one
shouldn't try to reconcile this indicative price of
\$19.6 million with anything that is contained in IBM's
pricing schedule in response to the ITO?---Yes, I don't
believe that you would be able to do that.

Thank you. Did you determine the assumptions that this
indicative pricing was to be based on?---Yes, I believe 30
I would have had a hand in drafting those.

If you look at the second assumption, assume that SAP
finance solution would be implemented and supplied by
CorpTech, no additional QH specific requirements to be
developed for 31/3/08, does that simply mean that there is
no building that needs to be done by IBM, one would simply
take the finance solution as it had been rolled out in
several other government departments and was just simply
applied to Queensland Health?---Correct. 40

Similarly, that same assumption is made with RecruitASP.
Yes?---Yes, correct.

And Saba. Those three solutions would be implemented as
supplied by CorpTech?---Correct.

Then all estimates include functional and technical design
specification, application build unit test and quality
assurance activities. No estimates supplied for system
test resources or activities. What is the difference 50
between the fact that you have included estimates which -
sorry, which encompass unit test but then it says no
estimates supplied for system test resources for
activities?---Because generally system test resources -
there's functions called system test and user acceptance
test and it's generally the responsibility of the group

22/3/13

CAMERON, J.R. XN

receiving the system, so in this instance, Queensland Health or QHEST to provide those resources. 1

Finally, the last assumption; assume resource and associated cost estimates for data migration and decommissioning activities consumed within other QHEST budgets. Again, that would be a Queensland Health responsibility?---Correct.

All right, thank you. Now, once you have supplied these figures, was there a meeting?---Not that I recall, no. 10

Can you tell us what happened with these figures?---No, I don't.

Do you have any knowledge of whether having received these figures any meeting with Mr Bloomfield and Mr Hey was arranged?---I'm not aware of any meeting, no.

Thank you. May Mr Cameron be shown Mr Atzeni's annexures? 20

THE COMMISSIONER: Yes.

MR FLANAGAN: May I ask that we turn to page 61? Just so you can refresh your memory, if you look at page 60, 61 and 62, the reason I'm going to Mr Atzeni's annexures is because you don't have annexed to your document the strategic analysis of rostering transition report. If you look at page 60, it's Mr Atzeni sending this document to you with the words, "For eyes only" which I take is for your eyes only?---Yes. 30

But in relation to that, my first question to you is did you seek this document from Mr Atzeni?--- No, I did not.

All right. To the extent that you have been able to check your emails, have you actually found any emails that would suggest otherwise?---No, because I have had no access to my IBM emails at all. 40

So are we to take it that this is a document that was sent to you out of the blue?---Yes.

From your work at - you would still have been working two or three days at QHEST as at 30 April 2007?---Yes.

From your work at QHEST, did you have any knowledge that a report had been commissioned by Queensland Health or actually prepared for QHEST. If you look at page 62 - - -? ---Yes. 50

- - - it's a report that is prepared for QHEST, so let's assume that it is prepared at the request of QHEST. Did you have any knowledge that such a report had been requested by QHEST prior to receiving it?---I don't believe I did, no.

22/3/13

CAMERON, J.R. XN

No, thank you. Now, when you received the report, did you read it?---I don't recall reading it because the first time I saw this document was when I was looking through bundles and I didn't recognize any of the content.

1

Have you read it since?---Yes, I have.

All right. Can you tell us what you did with it?---No, I mean, I'm just saying I read it in the last week.

10

But you don't have any recollection of reading it at the time?---No, I don't.

And you can't tell us how you actioned it or what you did it with?---No.

Did you pass it onto IBM?---I don't believe I did.

Did you discuss it with Mr Bloomfield?---I don't believe so, certainly not that I can recollect.

20

All right. Was it a document that you thought at all handy in terms of assisting IBM to be positioned with QHEST for the purpose of obtaining the sort of role identified in the 12 March 2007 report?---No. This arrived - when - 30 April?

Yes. So it has arrived after you have presented as to what you were proposing IBM's role to be with Queensland Health, so that proposal and presentation has been made. I'm asking you, is this the type of document that would assist you in positioning yourself to fulfill that role?---Not with what I read in the document.

30

Did you have a conversation with Mr Atzeni after receiving the document?---I don't believe I did.

Did you say to him, "You shouldn't be sending me a document like this"?---I don't actually recall opening it or reading it so I don't think I read it because as I said, when I first read this document a week ago, I didn't recall it at all.

40

You see, it's an email that is sent to you, it contains a document, "For your eyes only". With those words, surely your curiosity was sparked?---I don't recall reading it.

Would you just excuse me for one minute, Mr Commissioner?

THE COMMISSIONER: Yes.

50

MR FLANAGAN: If one receives a document that is marked for your eyes only you open it and you read it, don't you? ---I just don't recall reading it, I'm afraid.

1

It's a report that had been prepared for QHEST. Yes? ---Yes.

Did you know the independent contractor who did it?---No, I don't.

10

You don't. You know that at least part of it concerned Queensland Health's Workbrain solution?---Since reading the document, yes, it talks about particular strengths and weaknesses of Workbrain and what impact it would have in particular areas on people and processes.

If we accept for the present moment that you don't recall opening this email and reading this document marked for your eyes only can you tell us, having read it now, is any of the detail in that report - would that have been of assistance to IBM at the time?---I don't believe so. I think what would have been of assistance was particularly around from an implementation partner perspective. It does indicate where - or depending on what parts of the product are implemented, what the potential impact is on the organisation of receiving those parts of the solution. So it would help in assisting in the implementation of roll-out activities by identifying what change would be required within the organisation.

20

Would you accept, having read the document, that it would be of assistance to IBM becoming QH's implementation partner?---The only thing - as I said, the only thing it provides is the identification of what change impacts would be - what potential change impacts there would be if Workbrain were to be rolled out and how you would potentially mitigate some of those change management items.

30

At least of some assistance, yes?---Yes, but I also think that during this period while I was working at QHEST that this information could be validly passed to me, because we were of - I was assisting in determining what the change impacts were within Queensland Health by implementing any solution.

40

Did you think at one moment when you received this email with this report attached to it, "This is not the sort of thing I should be receiving as an IBM representative"? ---Well, I can't say - and I still don't remember reading it or opening it.

50

No?---Again, it would depend. If I received a document that I thought was inappropriate I would raise it to somebody's attention and say, "I think this document is inappropriate. "

But you didn't raise it with Mr Atzeni at the time?---Yes, 1
only because I don't recall remembering it - remember
opening it or receiving it.

You see, there are a number of emails in your exhibits, in
your annexures and in the tender bundle whereby you pass
on - or you do what you call your homework and pass on a
document to Mr Bloomfield or you pass documents to
Mr Atzeni, but there are occasions where you do pass on to 10
Mr Bloomfield documents that you've obtained or found.
Yes?---There were a number of framework documents that I
received from CorpTech and sent to Mr Atzeni for a
Workbrain proposal which wasn't Queensland Health related,
it was in response to a request for documents for
assistance in developing a proposal for Workbrain.

That's one email, but there's other emails where you've
said to Mr Bloomfield, "I've done some homework and here's
this document," and he replies, "Nice"?---That was the only 20
one, I believe.

That's the only one?---Is those four framework documents.

Yes. As at April 2007, Mr Bloomfield is your immediate
superior, is he not?---Yes, he is.

You're answerable to him, are you not?---Yes, I am.

You know, having read the presentation of 12 April 2007
that he is wishing to position IBM so as to become the 30
partner of Queensland Health in relation to the
implementation of the Shared Services initiative. Yes?---I
know he's wanting to build a relationship with CorpTech and
become the implementation partner for Queensland Health,
correct.

Yes, so you knew that?---Yes.

So you get a document that was prepared for QHEST. Yes?
---Yes. 40

You know that, which dealt with various topics, including a
detailed examination of Workbrain. Yes?---Yes.

You don't pass that on to your superior at IBM?---I don't
believe I did because I don't believe I opened it and read
it.

Why wouldn't you open a document marked for your eyes
only?---Well, it says for eyes only, not necessarily mine, 50
but I - my recollection is that I didn't read it.

So you're saying to us that "eyes only" we should simply
not regard as your eyes only, we should see that as
something different. It's imparting to you and it imparted

to you at the time that this is a document Mr Atzeni was giving into your possession for you to read. Yes?---Yes.

1

For your own purposes. Yes?---Yes.

At the time he did that he knew you were an IBM representative. Yes?---Yes.

Albeit at QHEST for free. Yes?---Correct.

10

You would have opened this document, Mr Cameron, wouldn't you?---I don't recall opening the document.

You say you don't recall, but you would have opened the document, wouldn't you?---I can't say that.

You can't say that. So can I just understand your evidence? You're saying that you receive an email with a document attached to it with a notation "Eyes only", "For eyes only", and in the normal course of events you would not have opened that document?---I may have opened the document. I'm just saying I don't recall it.

20

You can't recall what you did with that document had you opened it?---Correct.

Your evidence to this commission is that you did not pass that document on to Mr Bloomfield?---I have no recollection of passing a document - - -

30

There's a difference between no recollection and actually saying whether you did or not. Are you saying to this commission that you did not pass that document on to Mr Bloomfield?---Not that I'm aware of. I don't remember passing a document on to Mr Bloomfield.

May I then go to volume 3, page 10, please. Actually, while we've got the volume in front of us we might go to some earlier pages on that. Could I take you to page 5? I said I was going to assist you in terms of when you actually went to QHEST?---Yes.

40

This might help you. It was an email, page 5, from Mr Hey to a number of persons, including Mr Atzeni, dated 14 February 2007 at 9.52 am:

You are invited to the first QHEST planning day scheduled to be held on Monday, 5 March at the training centre. The objectives of the day will be sharing of information across the senior team members, establishing a common understanding of the project's scope, identifying interdependencies across project deliverables, basic resource planning, setting some priorities, getting everyone

50

across the different consultancies that are running. Please feel free to comment on or add to the proposed agenda.

1

Then if you turn to page 6, Mr Atzeni replies to a Ms Guyer who was Mr Hey's personal assistant. Yes?---Yes.

On 16 February, saying, "I will be there but may have to leave earlier than the finishing time. Jason Cameron, IBM, will also be attending. Thanks"?---Yes.

10

So you would attend - you did attend the QHEST planning day, did you?---Yes, I did.

All right. In what capacity?---For information only, I believe.

Did you participate in the discussion?---No, I didn't.

20

30

40

50

60

All right. In any case, Mr Hay was there?---I don't recall 1
him being there, but assume he would be there.

Were there other QHEST planning days?---Not that I recall.
This was basically almost like a kick-off presentation,
from what I recall.

So when the kick-off presentation happened as at 5 March
2007, does that assist you in knowing whether you were 10
physically present at QHEST at that time?---What date,
sorry? 15 March.

5 March is when the presentation is on, but Mr Atzeni is
replying on 16 February that he's going to bring you
along?---No. I'm sorry, I can't recall my first day at
QHEST.

But you wouldn't have been invited to this presentation if
you were still at CorpTech, would you?---Yes, I believe 20
there was definitely a transition period where I was at
CorpTech and at Queensland Health.

So it doesn't assist you in determining when you started?
---No. I can't recall my last day at CorpTech, and I don't
know what my first day was at QHEST.

I was going to take you to page 10. If I may do that now,
please?---Sure.

It's from Mr Atzeni to yourself, Mark Foley at CorpTech. 30
Who was Mark Foley to your knowledge?---I think he was - I
can't remember the terms, but it was - there was a role for
each agency where CorpTech would provide an implementation
manager which was effectively the conduit between CorpTech
and the agency, and I believe for a period of time, Mark
Foley was that contact.

"Please see attached the list of requirements Health need
to ensure Workbrain meets our business needs and time 40
imperatives. This list has been provided to the Shared
Services Solution. Please keep this for your information
only as it is yet to be responded to."?---Mm'hm.

What is the annexure then that's attached?---So this is
trying to give obviously health requirements around
Workbrain and the build and what they would like their
involvement to be during the build of the Workbrain
product.

So you had knowledge, did you not, of when that 50
development was being sought to be implemented in Health?
---I certainly would have been involved in helping them
with what their Workbrain requirements were, and I think
this would be a request by Health to have that Workbrain
development completed in a time that would allow them to go
live for 2008.

Even though the email says, "Please keep this for your information only because it is yet to be responded on," did you share this information with Mr Bloomfield?---I don't think so.

1

You don't think so?---I don't know.

If we turn in the same volume then to page 360, you might have noticed in that previous email that you have an IBM email, but by this email which is 14 June 2007 at 4.24 pm, your email is shown as jasoncameron@health.qld.gov.au. Yes?---Yes.

10

It just says, "IM and data resourcing." The subject is, "IM and data resourcing," and the attachment says, "IM and data resourcing." We don't have the attachment to this except for what's contained at page 361. Is that the attachment as you recall?---That page doesn't actually mean much to me, Mr Flanagan.

20

No, nor to me in terms of the reference or the subject matter of, "IM and data resourcing"?---Yes.

But just looking at page 360 for present purposes, you'll see that it's, "For your information as discussed"?
---Mm'hm.

Can you tell us what was discussed between you and Mr Atzeni in relation to that subject prior to him sending to you a document, "IM and data resourcing"?---No, I'm sorry. I don't know what that would be about.

30

Just from your own experience, what's IM and data resourcing?---"IM" stands for information management, and obviously data. So around resources for IM and data I guess, but I don't recall a conversation with him about that.

Page 362 then?---Yep.

40

Again an email from Mr Atzeni to you. This is actually dated 18 June 2007 at 8.31 am, and it would seem it simply says, "Thanks, mate. Will be in meeting with Joanne Taylor from 10.00 to 11.00. Nothing happened here. Would like to explore our options with going it alone again resourcing and project plan"?---Mm'hm.

You've talked to us already about conversations you've had with Mr Atzeni and QHEST in relation to Queensland Health going it alone?---Yes.

50

And you understand what that means, don't you?---Yes.

This is now later in June 2007. Can you tell the commission what was said as between you and Mr Atzeni as in June 2007 about Queensland Health going it alone?---No, I

22/3/13

CAMERON, J.R. XN

60

can't. I can't recall a conversation "going it alone again". I'm not saying the conversation didn't happen. I just don't know what the contents of that conversation would have been.

1

But when he talks about "going it alone", in the conversations you had with Mr Atzeni, were they conversations that Queensland Health would go it alone with IBM?---At no stage did they say, "We would go it alone with IBM." They are always looking at options of going it alone, but there was never a conversation saying, "We'll go it alone with IBM."

10

IBM had certainly presented that they wanted to partner Queensland Health, hadn't they, in the 12 March 2007 presentation?---Still only from the purposes of helping them do the implementation roll-out, not building a solution for them.

But IBM had also given indicative pricing, had it not? ---For that 19 million, correct.

20

In your conversations with Mr Atzeni, he never discussed with you that he wished to go it alone with IBM? ---Specifically, no.

Volume 4 then, page 486. This is simply a service agreement, is it not, Mr Cameron, and one of the emails dated 2 July 2007 - - -?---Yes.

30

- - - concerning the negotiations that went on between IBM and Queensland Health in relation to the service agreement? ---Correct.

40

50

60

This is simply the service agreement, is it not, Mr Cameron, and one of the emails dated 2 July 2007 - - - ?
---Yes.

1

- - - concerning the negotiations that went on between IBM and Queensland Health in relation to the service agreement?
---Correct.

There was - without taking you to it in too much detail, there was toing and froing as to the terms and conditions and particular IP requirements that IBM would not accept?
---Correct.

10

And then there was a suggestion of a tender by Mr Brown instead of contracting?---Yes.

Thereafter those issues seem to have been resolved?
---Correct.

So there wouldn't have been any need for a tender, but in any event the near final version of the service agreement was never executed by IBM. Do you know whether it wasn't executed because events had overtaken matters and then the market knew that CorpTech were moving to a prime contractor model?---That's probably correct.

20

From there - excuse me, I'll just check - volume 3 again, please?---Thank you.

Could we start at page 176, please? I just want to clarify this fairly quickly if I may, Mr Cameron. When you sent this email to Mr Atzeni on 18 May 2007 and you attached QH resource appendix 2 doc Sarah Simpson, Lisa Foster and David Mimmo?---Mm'hm.

Was this all in relation to a proposed service agreement?
---Yes, for change of management resources, correct.

30

And only in relation to that?---Yes.

Yes, thank you. Can I then have - don't go to this yet presently - may I just have volume 28, please? When was it that you returned to IBM from QHEST?---Can't recall exact period because I was never at QHEST full-time so I wasn't there five days a week at any stage.

When you weren't there five days a week were you actually back at IBM?---I believe there was a period, yes, that I was.

40

Right?---Yes.

But when did you stop at QHEST completely to go back and work on the proposals?---It would have been somewhere around the end of June, beginning of July, I believe.

Right. And when you went back to IBM what would be tasked with?---Tasked with assisting with the presentations for CorpTech. 1

And that was in relation to the prime contractor?---Yes. There was, I recall, two sets of presentations and then the ITA.

Thank you. Now, can I take you back to volume 4 then, to page 557? This is an email from yourself to Mr Atzeni:

Mate, would you mind sending the implementation roll-out plan template, that is Microsoft project, provided by CorpTech so that we can do a reconciliation of their identified activities. 10

Now, this is at 25 July 2007?---Mm'hm.

You'll see there that you have your IBM email?---Correct.

And Mr Atzeni has his Health email. You were stationed back at IBM at this time?---Yes.

And you were working on the proposals that you've referred to?---Correct. 20

And this is a request for the implementation roll-out plan template. Now, can you tell us what that document was?---I can't specifically because I haven't been able to see it in an attachment. But generally it's a - from, like, from basic principles an implementation plan is effectively a list of activities that you would go through to execute the roll-out, I guess. It's like a project plan.

All right. But just to be frank, you actually asked for this document because you wanted to use it - or to assist you in using it to put together IBM's proposal. Yes? ---Yes, to do a reconciliation of activities, yes. 30

If we just look at the timing of this, may I quickly take you to volume 28, page 548. It's what people refer to as the request for proposal document. It's an email, Mr Cameron, from Terry Burns dated 25 July 2007, so it's actually the same day as this email of yours that was sent to Mr Atzeni?---Sorry, Mr Flanagan, what section?

Page 548?---Sure.

The Burns's email which sets out a request for proposal is dated 25 July 2007 at 10.58 am, and then your email requesting this document from Mr Atzeni is dated 25 July 2007, the same day, at 12.17 pm. Do you recall what circumstances brought about you requesting this document from Mr Atzeni?---I don't recall the exact purpose of the meeting. We were wanting to get information around awards because Mr Dougal Ferguson was requested to attend that 40

22/3/13

CAMERON, J.R. XN

meeting. So it was looking for, I guess, information to assist us in the proposal that we were going to present to CorpTech.

1

Yes, but can we take it that your contacting Mr Atzeni for the implementation roll-out plan template was as a result of the request for proposal being sent earlier that day? ---I wasn't aware of this email on the 25th of the 7th that's gone to Paul Surprenant and Mr Bloomfield. So I wasn't aware that there was a formal RFP process.

I'm not asking you that?---Sorry.

10

I'm asking you is your request to Mr Atzeni connected in any way with this email from Mr Burns? That is, did you have any conversations with Mr Bloomfield who said, "We need this document," or, "We need a meeting with them in relation to the awards. We need to be on top of this and understanding this quickly." Was there anything like that that you recall?---No.

20

30

40

50

No. You see, there's a coincidence of time and circumstance here that the request for a proposal goes out and then just less than an hour and a half later, you're requesting documents from Mr Atzeni and arranging a meeting with him and Dougal Ferguson for an hour tomorrow morning to discuss awards. Yes?---My understanding at the time was we were already in the process of putting a proposal together for CorpTech and this meeting was arranged to get an understanding of awards so I don't see - well, my recollection is I don't have any particular conversation with Mr Bloomfield that we were already in the process of developing a presentation.

1

10

All right. Who was at the meeting with Mr Ferguson and Mr Atzeni at IBM to discuss awards?---There was a team of us. From my recollection there was a lady called Maritza Richards, Chris Prebble, Sarah Simpson; there may have been a couple of others.

Was this a discussion of awards in the context of Workbrain?---It was probably getting an understanding of the complexity of awards, not necessarily how they would apply in Workbrain but what was the complexity of awards at Queensland Health and how were they structured.

20

Had you given Mr Atzeni any notice of this meeting?---Only looking through documents, it was like a day before, I believe.

"So can we meet with yourself and Dougal Ferguson for an hour tomorrow?" Yes? Was it the case that you could request of Mr Atzeni to have an hour meeting with him at IBM offices and he would come and do that. Yes?---That's the only meeting I ever recall having with Mr Atzeni at an IBM office.

30

All right. You had other coffee meetings with him?---While I was working at QHEST, yes.

No, I mean, after this event. After this meeting, did you have further meetings with Mr Atzeni?---Not that I recall.

40

You don't recall?---I don't believe - I don't recall.

Coffee at all?---Not after this meeting, I don't recall, I really don't.

So was it the case that after you had asked Mr Atzeni to bring Mr Ferguson down to discuss awards at IBM's offices, you had absolutely no other contact, you had no other contact with him from 26 July 2007 through to the conclusion of the ITO process?---No, I probably would have had other contact with him. I just - I couldn't tell you when or where or particular occasions but I had contact with him after that meeting, I know that.

50

This is a very focused time for IBM, isn't it, because with the prime contractor, they can become the prime contractor for the whole of government roll-out of the Shared Services Initiative?--Mm'hm. 1

Your services were called back from QHEST to assist in that process. Yes?---Yes.

And you had a perfect contact or good contact in Mr Atzeni at QHEST, didn't you?---Yes. 10

All right. You had soon after receiving the request for proposal from Mr Burns, you had actually be able to call on Mr Atzeni not only to provide you with a document, but to bring another member of QHEST - sorry, of Queensland Health to a meeting at IBM's offices for an hour. Yes?---Correct.

All for the purpose of assisting IBM in relation to its proposal in response to the RFP. Yes?---Yes, but I was - yes. I wasn't aware that that was a formal RFP. 20

No, I don't care about whether it was a formal RFP - - - ?---Okay.

- - - I really don't care about whether it's formal or informal, I'm just trying to find out your knowledge? ---Yes.

Who told you to ring Atzeni? Who told you to get the document from Atzeni?---Well, the people leading this proposal were Lochlan and a gentleman called Paul Suprenant so it would have been one of those two people. 30

So you were instructed to contact Atzeni. You didn't do it off your own back, did you?---No, I wouldn't have done it off my own back, no.

Such was your relationship with Atzeni that you could call on him to obtain a document and to come to an hour meeting with another representative from Queensland Health at IBM's offices, wasn't it?---Yes. 40

And he did in fact attend?---I believe he did.

And his purpose for attending - and you knew it to be his purpose - was to assist IBM in putting together its proposal in response to this RFP?---Yes, to get information around their award structures for Queensland Health.

Yes. May I take you to page 328 of your own annexures. 50

THE COMMISSIONER: Is there more than one volume?

MR FLANAGAN: They are numbered at the top, Mr Commissioner, so it's 328 of the top numbering.

THE COMMISSIONER: I see?---Yes, thank you. 1

I was reading the bottom right-hand corner.

MR FLANAGAN: That would be the tender bundle number.

THE COMMISSIONER: What page?

MR FLANAGAN: Page 328. 10

THE COMMISSIONER: Yes, thank you.

MR FLANAGAN: Now, we knew from that email from Mr Burns to IBM representatives, similar email being sent to Accenture, Logica and SAP, that an opportunity was given to present. Yes?---Yes.

So IBM actually gave a presentation to CorpTech in relation to it, did it not?---Yes. 20

Were you present for a dry-run presentation given by IBM simply to Mr Burns?---I can't recall that meeting but I have seen invites to that meeting.

Did you attend?---I can't recall the meeting.

You can't recall it at all?---No, I can't.

Did you attend the presentation - which you did - for the CorpTech personnel which included Ms Perrott and others. Yes?---Yes, I did. 30

All right. You knew Ms Perrott?---Yes, I did.

Yes. Do you recall that presentation? Approximately how many CorpTech people were present at that time?---I would be guessing but probably somewhere in the magnitude of eight to ten, perhaps.

You were there?---Yes. 40

And you recall that one. Yes?---Yes.

Do you have any recollection of a dry-run presentation with just Mr Burns there?---No, I don't.

Is that because you don't think you attended or you simply don't recollect?---I think it's simply that I don't recollect. 50

You knew it happened?---I'm not for certain that I know it happened, all I know is that I've seen invites to it.

Is that a convenient time, because I certainly won't finish Mr Cameron - - -

22032013 18 /SGL(BRIS) (Chesterman CMR)

THE COMMISSIONER: Yes, yes, it is. We will adjourn now
until 10 o'clock on 8 April. I hope that won't be too
inconvenient for you, Mr Cameron?---That will be fine.

1

All right, thank you. We will come back on 8 April at
10 o'clock.

THE COMMISSION ADJOURNED AT 1.05 PM UNTIL
MONDAY, 8 APRIL 2013

10

20

30

40

50

22/3/13

CAMERON, J.R. XN

9-67

60