

*Independent advice on the Postcode Address File*

Open Data Consultation

Transparency Team

Efficiency and Reform Group

Cabinet Office

1 Horse Guards Road

SW1A 2HQ

18 October 2011

## **OPEN DATA CONSULTATION**

Dear Sirs,

This response to the Open Data Consultation is from the Postcode Address File Advisory Board (PAB). The response may be made public and attributed to the Postcode Address File Advisory Board.

The PAB was established in 2007 by a Postcomm decision following its review of Royal Mail's management of the Postcode Address File (PAF). It is independent of both Royal Mail and the successor regulatory body to Postcomm (Ofcom), providing a vehicle for light-touch regulation of PAF by the provision of independent advice to the Address Management Unit of Royal Mail on behalf of PAF users. PAB members cover independent postal operators, value added resellers of PAF, web based companies, mail users and public sector PAF users. Royal Mail's current income from PAF is of the order of £25 million p.a. contributing around £3 million p.a. of profit. Through involvement with users of PAF at a senior level (usually managing director or the equivalent) and encouragement to potential users, PAB aims to tender reliable and relevant advice to promote a wide use of the PAF, on a fair basis, to the overall well-being of the UK. Subject to the protection of privacy and of commercially sensitive information, the PAB seeks to be as transparent in its discussions as is practicable, and releases its minutes and papers on a dedicated web site – [www.pafboard.org.uk](http://www.pafboard.org.uk).

The PAB has considered the extent to which PAF falls within the criteria for Public Services included in the consultation document: “public bodies and those funded, Commissioned or entrusted by Parliament to provide a service.”

Our conclusion is that it does not. Nevertheless, the PAB is committed to aims which are consistent with those behind the Open Data concept and will continue to press Royal Mail to develop the postcode data as an aid to personal identification and geo-spatial referencing in parallel with Open Data.

In that context we have been dismayed by the inability of Government to conclude an agreement with Royal Mail for a PAF Public Sector Licence under which the data would be free to public sector users at the point of use, provided that it was for non-commercial purposes. The negotiations have been going on now for the best part of 10 months and the recent transfer of responsibility from DCLG to BIS risks sending them back to square one

As PAF is an important underpinning for Geospace the absence of this licence must threaten to damage the viability of the venture. Hence, our conclusion is that, in relation to the postcode, the single most important action to improve open data is to bring those negotiations to a rapid conclusion. The sums of money required of Government are small but the benefit to the public sector and the citizens’ monitoring of what is being done in their name will be great.

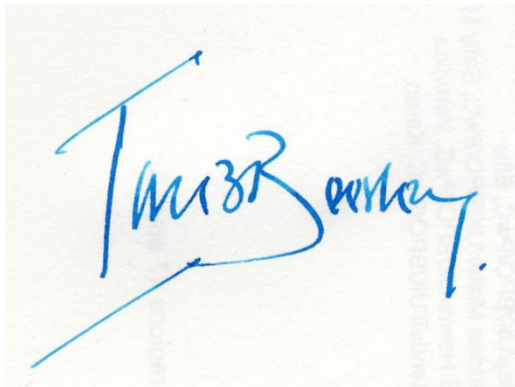
Board Members have significant experience of data use in the public and private sectors. It seems to us that the consultation questions are at the same time both detailed and general. They are hard to answer in the abstract. Our experience would suggest that establishing a general political enabling presumption that public data will be made available and eschewing licensing and charging other than marginal cost would provide a suitable framework under which Departments, their subsidiaries and other Public Services would not be held back. The risk is that too elaborate a system will end up as an industry in itself and that significant numbers of people would be consumed in its operation.

The PAB has been successful because its members are drawn exclusively from data users and are knowledgeable about the postcode and its wide applications; the majority of them earn their living from data use and data mashing. The owner of the intellectual property (in this case Royal Mail) has determined that the small profitable activity of managing postcodes depends on meeting the regulators general instruction that the data should be made available on a fair basis to all potential users. The PAB bridges the gap between management of the asset and regulation by a focus on the market for the asset and detailed knowledge of market use of the data. A similar light regulatory touch could

provide the basis for an economical approach to achieving a step change in open data.

The PAB trusts that this brief response, which is based on its experience over the past 4 years and reflect one major PAF licence revision, will be helpful. The postcode is a splendid example of data created 50 years ago for one specific purpose which now underpins a wide range of commercial and civil activities. This has been achieved without a massive bureaucratic infrastructure. If deemed appropriate, the Board would be quite willing to share further details of its knowledge and experience.

Yours sincerely,

A handwritten signature in blue ink, reading "Ian Beesley". The signature is written in a cursive style with a large initial "I" and a long horizontal stroke extending to the right.

Ian Beesley

Chairman,

PAF Advisory Board