PAF(13)29 THE POSTCODE ADDRESS FILE ADVISORY BOARD

Consultation Reply Summary

	User name	ian.beesley@wotaco.com on behalf of PAB			
		Version 2.0 19/9/13			
Q	. Section	Description	Answer	Comment	
<u>-</u>	1 1 - Principles	Do you agree with the principles underpinning PAF® Licence simplification? (See Paragraph 21 of the PAF® Licensing Proposal) If not please provide further information in the text box below.	Yes	The return to RM should be based on ROI not just income. In addition, one of the principles governing PAF should be to support the UK economy. As the use of PAF is evolving and specific uses and business models cannot be predicted with accuracy customers should be given some choice of payment model - pay 'per click;' pay per user; unlimited usage. Further, the content of the PAF file should be optimised to support good addressing and to enable accurate delivery of goods and services.	
2	2 1 - Principles	Are there other principles that you believe should underpin PAF® licence simplification?	Yes	See 1.1 above	
3	3 1 - Uses and Needs	Do you agree that these are an accurate reflection of market needs? If not please provide further information in the text box below.	No	They are comprehensive but too superficial	
4	4 1 - Uses and Needs	As part of Royal Mail's Licence simplification programme, we are developing a separate Licence that will enable registered public sector organisations to access PAF® for free at the point of use. Do you support the development of the PAF® Public Sector Licence? If not please provide further information in the text box below.	Yes	If successful the underlying model could be applied to private sector groups	
Ę	5 1 - Models	Is the emergence of 'Licensee by Usage' as a preferred model reasonable when assessed against the principles, market needs and evaluation criteria? If not please provide further information in the text box below.	No	Customer choice should be the preferred model	
(6 1 - Models	Do you believe that a different model would better meet the principles that underpin licence simplification? If not please provide further information in the text box below.	Yes	The preferred model will depend on the market segment concerned	
-	7 1 - Models	Do you agree with a 'flat rate' payment model as set out within the PAF® Licensing Proposal? (See paragraph 28 and annex 2 of the PAF® Licensing Proposal) If not please provide further information in the text box below.	No	Unless finely tuned or set at a very low level a flat rate for VARs would act as a barrier to entry	
8	8 2 - Licence	Are the proposed Licence terms significantly easier to read and understand than the current Agreements? If not please provide further information in the text box below.	Yes		

9 2 - Licence	Are there any further simplification or changes that might be required? If not please provide further information in the text box below.	Yes	Split the file into postal PAF containing only data relevant to accurate postal delivery and a fuller PAF which also contains items that are not essential for postal dellivery such as business names. Delete out of date county titles from both files. Abolish the contractual distinction between internal and external use.
10 2 - Licence	Are the ways you use PAF® covered by the proposed terms? If not please provide further information in the text box below.	N/A	
11 2 - Licence	Do you understand and agree with the on-licensing restrictions outlined in Schedule 1 – End User Terms? If not please provide further information in the text box below.	Yes	
12 2 - Licence	Do you understand the proposed Transactional pricing approach? If not please provide further information in the text box below.	Yes	
13 2 - Licence	Do you think Transactional pricing is an appropriate way to price PAF®? If not please provide further information in the text box below.	No	Not exclusively - it has a part to play but should not be the only method
14 2 - Licence	Do you think 'by Transaction' is an appropriate way of measuring usage? If not please provide further information in the text box below.	No	It is too limited - some users would not be able measure transactions easily and some important users process so much data that their business model could not survive
15 2 - Implementation	Does your organisation have the capability to measure 'Usage by Transaction'?	N/A	
16 2 - Implementation	Are there situations or Types of Use that you don't think suit transactional measurement? If not please provide further information in the text box below.	Yes	Those who consult large volumes of PAF data such as data cleansers and mail operators. The result of implementing just this one option would be to seriously damage the business of many PAFusers
17 2 - Implementation	In moving towards a transactional model, are there Licence variations that could be considered to ensure a smooth transition? If not please provide further information in the text box below.	No	This based on the wrong premise that only transactional pricing will prevail sometime in the future - if that were so PAF would lose a significant number of users and the national economy would suffer
18 2 - Implementation	Could a transition period operate effectively in a period of less than 24 months? If not please provide further information in the text box below.	No	See 17.2 above
19 2 - About you?	Would you be willing for us to publish your responses?	Yes	This response is made on behalf of the PAF Advisory Board which aims to cover all PAF users.
20 2 - About you?	Would you like us to keep your response anonymous?	No	
21 2 - About you?	Are you a Solutions Provider?	N/A	
22 2 - About you?	Are you a Developer?	N/A	
23 2 - About you?	Are you an End-User customer?	N/A	
24 2 - About you?	Are you a Stakeholder, an Interested Party or a member of the Open Data community?	N/A	
25 2 - About you?	Other? (Please state within the free text box below)	Yes	
26 3 - Evidence	Your own response to the consultation.	No response	
27 3 - Evidence	Input or feedback into the principles underpinning Licence Simplification.	No response	
28 3 - Evidence	Input or feedback into the market & customer needs analysis.	No response	

29 3 - Evidence	Your feedback and evaluation regarding the available business models to provide PAF®.	No response	
30 3 - Evidence	Your impact assessment of the Licensee by Transaction model.	No response	
31 3 - Evidence	Your input or feedback on the 10-page draft Licence.	No response	
32 3 - Evidence	Your input on potential transition timescales and arrangements.	No response	
33 3 - Evidence		No response	The PAB welcomes the proposed move to a permissive licence expressed in plain English and the proposal to licence those who take PAF from Royal Mail, leaving re-sellers free to licence and charge their customers as they see appropriate subject only to a limited number of restrictions to protect PAF IPR. The Board supports the continued availability of a Developer licence free at the point of use and of a centrally funded Public Sector Licence to allow free use of PAF in accredited public sector organisations. But the Board is convinced that a 'one size fits all' approach to pricing will not work and would damage the businesses of several types of user. For the future the Board would like to see application of a 'click-through' licence and development of PAF quality standards as part of the licence agreement with customers.
			Further, the PAB does not understand the justification for the withdrawal of 'part PAF and postcode area PAF