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Sent by email to: carina.tillson@ofcom.org.uk

21st March 2013

Dear Ms Tillson

Re: OFCOM consultation on the Postcode Address File

I am writing on behalf of The Market Research Society (MRS) in response to Ofcom's consultation on the Postcode Address File (PAF). MRS welcomes the opportunity to respond to Ofcom's review of PAF.

With members in more than 70 countries, MRS is the world's largest association representing providers and users of market, social, and opinion research, and business intelligence. All individual MRS members and MRS Company Partners agree to self-regulatory compliance with the MRS *Code of Conduct*. Full details regarding MRS and its activities can be found via: www.mrs.org.uk

PAF is a key component of customer databases widely used in market and social research and operations by many members of MRS. However, the full potential of addressing information for business growth is limited by the lack of a single authoritative national address base with freedom of access and use. Thus, PAF's importance is more due to the lack of robust alternatives rather than to PAF's intrinsic advantages.

MRS Response to the three OFCOM questions

Question 3.1: We welcome views from stakeholders on whether the setting of quality targets for PAF would be constructive. If so, would stakeholders find the publication of achievement against those targets helpful? Please state why.

MRS would welcome the setting of quality targets and publication of achievements.

In brief, improved quality would contribute significantly to the cost effectiveness of the direct use of PAF (including postal operations) under any licensing regime. It would also add to the quality of data, research, operations, and decisions based on addressing information incorporating PAF.

Question 6.1: Do stakeholders agree with our analysis of the options for cost recovery against the principles of cost causation, and our proposal on cost recovery? Please give reasons for your response.

An informed response on the key issue of cost recovery cannot be given in the absence of the financial data redacted in the Review. It is not possible to tell what is being allocated to postal operations and what is being allocated to further costs recovered in the supply of PAF, although evidence from comparable data processing operations indicates that costs of production and supply of PAF are high. These data should be published, and a further period allowed for response.

Question 7.1: Do stakeholders agree with our proposed approach to the terms on which PAF is made available, and our guidance on those terms? Please give reasons for your response.

The proposed terms are likely to help those who wish to continue the current uses of PAF on a royalty basis, mainly through improved clarity and guidance where previously there has been some uncertainty about terms.

However, the terms recommended in the Review would not seem appropriate for the supply of PAF as open data - an issue which is covered in our further comments.

Further MRS comments

1. PAF already has a unique and beneficial place in the processing of information across the public and private sectors, acknowledged by the Review, often working in partnership. However, the benefit from PAF would be greatly increased if it was part of a single authoritative national address base, and consideration of the future of PAF must be in this wider context.
2. A compelling case exists for a national address base to be created and made available to all user sectors on a free and open basis. PAF alone does not provide this base, but is currently an essential component, and it would need to be combined with information from the GeoPlace National Address Gazetteer and from Ordnance Survey AddressBase, with arrangements to drive innovation and improve quality in each source, to provide a comprehensive coverage of addresses with geographic references.
3. The recommendations of the Review could assist the current commercial users of PAF, and our understanding is that a wider review would have been beyond the Ofcom remit. But the pressing need is for government to move towards a national address base by bringing all producer and user interests together with the aim of maximising benefits to the economy as a whole.
4. The essence of the case for a national address base being open data is that benefits through saving the cost of administering complex licences and from the use of a single, higher quality source combined with stimulation of increased business use would exceed centrally funded additional costs of supplying the data. However, the financial information about PAF which could help substantiate this case is redacted in the Review, and their publication in full is essential for informed input from stakeholders and for developing data policy.
5. MRS sees the recent announcement by BIS and Royal Mail of a new public sector licence for PAF as a prospective step towards an open national address base. MRS would urge

that this response to the Review should extend to the private sector. This would avoid the cost of administering a licensing regime to divide public from private sector use, would probably incur only a marginal additional cost, whilst stimulating parallel benefit in the private sector.

6. In these circumstances any implementation of the recommendations of the Review should be put on hold until the government goes further in the development of open data policy. Consequential loss to stakeholders in either the current commercial use of PAF or in the potential wider use of open addressing information would be likely to be relatively limited, and costs of further change in the short term, would be avoided.

We would be very happy to meet with Ofcom to discuss this issue if that would be beneficial to the review. We would be grateful if you could confirm receipt of this letter and please do not hesitate to contact us if you require clarification regarding this submission.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Debrah Harding'.

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