

**Title:**

Mr

**Forename:**

Owen

**Surname:**

Boswarva

**Representing:**

Self

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Additional comments:**

I'm a geographic data analyst and modeller with experience of commercial data licensing (including the PAF licence). I am also an open data activist. In general I endorse the views expressed in the consultation submission from the Open Data User Group.

I would like to express my extreme dismay at the redaction of the PAF cost stack figures from the consultation document. These redactions make it impossible for anyone without insider knowledge to comment with confidence on those parts of the consultation that deal with the PAF cost base and the basis for recovery of PAF-related costs, or to effectively scrutinise the regulatory changes Ofcom has proposed. These redactions clearly undermine the credibility of Ofcom's public consultation process as it applies to this review.

**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:**

While I don't believe the setting of targets and benchmarks will particularly increase the take-up or use of PAF, Ofcom should encourage Royal Mail to publish full documentation on the completeness and accuracy of PAF. In my view most technical criticisms of PAF are based on misunderstand of its primary functions, i.e. internal support for RM postal deliveries, so better documentation would be in RM's interests.

**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:**

On the face of it the total costs attributable to PAF seem disproportionate for a dataset of this size and type. The transfer of all PAF costs to licensees is manifestly unreasonable, given the reliance that Royal Mail operations place on the dataset. I concur with the ODUG that Royal Mail could substantially reduce the cost of maintaining PAF by abandoning sales, licensing and compliance activities and releasing the dataset for re-use as open data. This would also benefit the wider economy.

**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:**

No. As stated my view is that Royal Mail should dispense with commercial licensing of PAF and release the dataset under an open licence.