

Organisation (if applicable):

Callcredit Information Group

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Callcredit's primary concern in responding to this consultation is that the high integrity of PAF data should continue to be maintained at a reasonable market cost. We also urge the simplification of non-price terms, which the consultation correctly identifies as a significant issue for stakeholders.

In reference to paragraph 6.28 and the ODUG case for PAF to be an open data set, our concern is that an extension of free access would result in additional downward pressure on costs, affecting quality. Maintaining a dataset of the completeness and accuracy of PAF requires investment. We would not wish to see any 'watering down' of the current quality. Regardless of the obvious financial benefit of free access, that trade-off would not be acceptable to our business.

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:

We suggest that before targets can be considered, it is necessary to first set effective measures in place. These are required to provide a full understanding of how PAF data is currently being maintained and how it changes over time.

At present, there is no transparency of data trends within PAF. The volumes of changes which appear to be processed on an annual basis appear unexpectedly high. This is concerning - in the absence of any breakdown of change drivers, it suggests that a proportion could be due to incorrect initial recording. We are surprised at the present lack of measurement around the data, and believe if this continues, it could threaten PAF's success in the future. Speed of delivery, for example, cannot be seen as more important than lack of validation. Measurement considerations should be addressed before any thought is given to targets, and results and explanations shared.

In addition to explaining changes to the dataset, measurement could offer benefit through reporting on proportions of items validated within set timeframes ('data recency'). Monitoring these statistics on a local and regional basis would support consistency in quality, and hence user confidence.

Callcredit generally supports quality targets for data, and we find these to be vital in our own

business. We are doubtful that imposing quality targets for PAF would increase take-up and use of PAF, or grow the user base. Target-setting may however offer benefits as a secondary step once measures have been evaluated.

Targets imposed without first understanding the underlying data might incorrectly appear to justify cost reduction actions such as streamlining the data collation process. Such steps could then risk impairment of the integrity of the dataset over time. A comprehensive view of the data metrics must come first. Making this available could also raise users' confidence, and hence their readiness to invest in systems built with the intention of drawing on PAF for many years to come.

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:

Our primary concern about cost recovery is that it should be carefully structured not to result in any unintended effects on the quality of the data. The quality of PAF is what makes it valuable. Removing the profit cap to promote cost minimisation could threaten the value in the data, if it means that corners are cut. Safeguarding measures need to be adopted alongside any such change, to ensure this will never occur.

PAF is currently supplied with the 'just built' and 'multiple residence' files provided separately to the main file. This can lead to inefficiencies, and inconsistencies between different users' databases, resulting in mismatched addressing. Supply should be harmonised through a single, universal product for all users in order to prevent ambiguity.

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:

We agree unreservedly with Paragraphs 5.22 and 7.27 on non-price terms. The licence terms are extremely lengthy and complicated. The wording is opaque and some definitions are far from intuitive. Clear descriptions of permitted usage should be provided instead.

The length and detail of the license terms imposed means they can be, in our opinion, unnecessarily restrictive. There is no scope to negotiate or amend any terms of the licence. This should be brought into consideration as the provision of PAF continues to evolve towards a more commercial footing.

The pricing itself already works effectively. Charging is clear and the ability to purchase in 'blocks' supports flexibility. While recognising that the licensing structure has developed incrementally over time, this does not necessarily mean it should be revised. Changes to the framework could actually result in an increased burden on business - a simplified framework may fail to offer the options required to accommodate the very wide nature of the PAF user base. We do not believe change here to be justified unless compelling, quantified benefits are identified.