

Title:

Mr

Forename:

Marcus

Surname:

Deglos

Representing:

Self

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I fully support and second the comments from the Open Data User Group on this consultation and the future of the PAF: <http://data.gov.uk/library/odug-response-to-ofcom-paf-review-consultation>

An Open National Address Dataset would be a viable and cost-effective PAF replacement, and should be treated as Public Sector Information, not an information-monopoly in the hands of a private company.

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:

Yes. Transparency is essential for enforcing the accountability of the PAF management (no matter who this is delegated to), and to enable open cross-stakeholder discussion of the impact of failing to meet quality targets.

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:

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:

I do not believe the Royal Mail can effectively manage the conflicting demands of their commercial imperative to profit and the regulatory requirements of reasonable access. This conflict will not provide an environment in which the use and management of the PAF can be nurtured.

The PAF should be a Public Sector Information asset, where take-up will not be hamstrung by a culture of product and profitability. The Ordnance Survey serves as a good example of PSI asset management, with open access on a variety of free non-commercial and fund-raising commercial terms.