

Organisation (if applicable):

Gavurin Ltd

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

1. It would be unfortunate if decision making surrounding PAF was wholly divorced from the issue of postcode boundaries. For some companies - and we are one of them - postcodes become more useful when they are mapped.

2. It is suggested that there is no evidence that lower prices would increase demand for PAF. There is considerable evidence from the US that where data is considered a public good, innovation with data results. This surely is the nature of innovation today?

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. Providers of data have a responsibility to maintain quality and evidence that. Reasons are:

1. Users should not have to maintain systems to test quality of an input - but they may suffer business loss if that quality is poor.
2. Monopoly provision must necessitate transparency of quality.

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:

If reports are true that Royal Mail alleges that it costs more than £24M pa to maintain PAF, then the answer to this is 'no'.

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:

It is important that terms capture the increasing need to make data / information available online. Questions that arise are:

1. How can intermittent online access be licensed fairly?

2. How would license terms accommodate the blending of PAF data with other data to produce a 'third' dataset?