

**Title:**

Mr

**Forename:**

Denis

**Surname:**

Payne

**Representing:**

Self

**Ofcom may publish a response summary:**

Yes

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

Yes

**Additional comments:**

**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:**

The arguments presented for quality are weak - deliveries would not be adversely affected should a property or two be omitted from a postcode area/street - the mail would still arrive on time and with no problems.

**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:**

The problem with the cost recovery is that the basic costs are so unreasonably high that the options that are seeking to recover those costs are unacceptable.

ODUGs argument is strong. Royal Mail need the information whatever - and the costs of capture/maintenance alone would be low (assuming staffing at level of ~ 80 as reported elsewhere). Publish the data on a website for everyone to access/download and there are no other costs to cover anyway.

**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:**

IF (and I do not accept that charging for PAF is the right way forward) it does become essential to charge for PAF then the UKGLF approach should be adopted.

There is no evidence presented which supports 7.21 - and counter evidence in the market (eg OS' costs) which suggests that they are unreasonable.