

Organisation (if applicable):

Postcode Anywhere Ltd

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:

Whilst data quality is important, we only get questioned by our customers when they believe that their address details are incorrect. This is typically when they don't agree with the county option in a residential address or if the business name has not been updated.

We don't feel that setting targets or publishing further details about the quality of addresses in PAF, will result in further sales.

There are potential opportunities that Royal Mail is missing by ignoring information such as the business name. It would make sense over time to link major national datasets such as HMRC's list of VAT registered businesses with PAF to ensure consistency and enhance the quality of the information provided.

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:

We don't disagree with any of your assertions on cost recovery albeit they do seem overly complicated.

However, we would reply to the statement made in 6.25 that from our experience as a PAF solution provider in the last 12 years, the reduction in pricing and simplification of licensing has definitely had a major impact on the usage of the data.

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 would agree with the Ofcom proposal to further simplify the license as it is still overly complicated and a major distraction to what should be a relatively straightforward sales message.

We fully understand why the license has evolved in this way which is because Royal Mail has tried to satisfy different solution providers some of whom have vested interests in maintaining historic licensing models.

However, as one of the main proponents of transactional pricing, we are keen to see the removal of the distinction between internal and external usage and to encourage other major postal service providers to adopt similar licensing frameworks on the basis that it is necessary for international addressing solutions.

One shouldn't forget that Royal Mail's decision to license PAF and their early adoption of transactional web licenses, was very far sighted. It has helped to create a world leading UK address management software sector which is worth over £100 million to the economy and to contribute over £1 billion of Economic Value Add based on the PAB report.