

Organisation (if applicable):

Regional Chairs Address Group

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

The Regional Chairs Address Group represent all Councils in England and Wales that have an address creation and maintenance responsibility under statute. This address data directly feeds and underpins Ordnance Survey AddressBase®.

The Group welcomes the Ofcom PAF consultation but is concerned that it is a review of PAF in isolation under the current arrangements which do not take into account the availability of other national address datasets or the wider national interest in a single national address gazetteer.

It is therefore disappointing that the only business model considered in the paper is that of 'business as usual' and that the consultation has been limited to 3 questions, none of which allow for responses questioning the status quo.

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:

In the introduction, the paper recognises that PAF does not contain details of every individual property nor individual address (such as flats with a single letter box, churches, parks etc.) yet proceeds to explain how it is used extensively for non-postal services. There is no acknowledgement that this is a quality issue with PAF. We would suggest that rather than maintaining an incomplete dataset, that PAF be maintained as part of a national address gazetteer. In this way, a definitive national address dataset would be available for both postal and non-postal use which would include the full official address currently provided by local authorities plus the postcode and post town. Since Local Authorities provide the official street names and property numbers through street naming and numbering statutes and actively use their gazetteers to support their business functions, the quality of addresses available for use by Royal Mail would increase.

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:

It is difficult to agree with an analysis of the cost recovery options when the costs themselves have been redacted. We do however see that the cost of maintaining PAF appears unreasonable when compared with the National Address Gazetteer. Royal Mail's AMU say that they deal with up to 1.2m changes per year and the charge for maintenance of PAF to

licensees is £24.5 million equating to approximately £20 per change. According to Royal Mail, this money is used to pay postal delivery officers for this address change intelligence. Local Authorities provide all new address to Royal Mail at a charge of £1 for each address (a figure proposed by Royal Mail) and provide approximately 250,000 new addresses per year which equates to £250,000 per year. It should be further noted that all local authority address changes and new addresses are provided to the National Address Gazetteer by local authorities for £0.

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 do not agree with Ofcom's proposed approach to the terms on which PAF is made available. It is our opinion that Royal Mail uses PAF to claim IPR and licence fees from all addresses in all address datasets when the majority of the address data originates from local authorities who freely give this data to Royal Mail and impose no such restrictions. We believe that the creation and maintenance of a national address dataset is essential to the economic future of the country and wish to work together with Royal Mail to provide a single definitive address gazetteer free from restrictive licensing and prohibitive costs.