

Title:

Dr

Forename:

Robert

Surname:

Whittaker

Representing:

Self

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Having read the response made by the Open Data User Group at <http://data.gov.uk/library/odug-response-to-ofcom-paf-review-consultation>, I would say that this represents my views almost entirely, Please note my full support for the views expressed in their response. I also make a few additional personal remarks in answer to the specific questions.

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:

I have nothing to add to the ODUG's response here.

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 presence of the redacted figures is appalling, and should never have been allowed in a consultation of this nature. It means that a full verification of the costs involved cannot be undertaken, and hence a proper response to this question cannot really be provided.

However, I would disagree with your interpretation of what "cost causation" means here. The marginal cost of someone obtaining using the PAF for any purpose is virtually nil, given

modern computing equipment and infrastructure. The majority of the cost causation is from people who create or change the addresses, with a small amount down to Royal Mail's need to assign postcodes.

So I would suggest that under the principle of "cost causation" most of the maintenance costs should be borne by the property developers / owners need to register a new address or change an existing address. Potentially, the costs associated with assigning postcodes to addresses could be funded by the possessor of the universal postal service license as part of their license conditions.

Either way, end users of the data should not have to pay at the point of use to use it.

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:

No.

For the reasons provided by the Open Data User Group in their response and at <http://data.gov.uk/blog/dont-sell-our-postcodes-odug-on-why-we-should-have-open-addressing-in-the-uk> I strongly believe that the PAF should be maintained as part of a single National Address Dataset, and that the dataset should be made available free of charge to end users under the Open Government License.

Costs of maintaining the dataset should be recovered by charges for creating and amending address records, not by charges to end users.