

Dear Consultation,

This is a response to the Consultation at <http://data.gov.uk/pendataconsultation> by Placr Ltd, an open data aggregator and data-as-a-service provider. Please find our responses to selected questions.

Placr has made a 4000 word submission to the Public Data Corporation consultation as in our view the question of whether the government creates a state monopoly to trade in the market and charge cost recovery pricing is the most important question in open data at this time. However, we also wish to submit some views on the following questions in the 'Making open data real' consultation:

Do the definitions of the key terms go far enough or too far?

These definitions do not give adequate consideration to the need to release 'operational data' from government services that is being collected in real time. This type of data is often of greater interest to consumers.

Where a decision is being taken about whether to make a dataset open, what tests should be applied?

Placr has presented the Open Transport Data Manifesto (<http://www.slideshare.net/.../open-transport-data-manifesto>) to address these points. The essence of this presentation is that if public money is used to fulfil public task and this generates data without personal identification, then there should be a presumption of early, raw data releases.

If the costs to publish or release data are not judged to represent value for money, to what extent should the requestor be required to pay for public services data, and under what circumstances?

Under no circumstances should any charges be levied for data release. Placr has outlined in the 'Growth case for open data' at <http://placr.co.uk/blog/2011/07/the-growth-case-for-open-data/> how static and dynamic data releases can be made freely by releasing the operational data without 'tidying up' to data aggregators who will bear the costs of the distribution in return for the opportunity to offer value-added services around the redistributed content. To create growth, SMEs should be given opportunities to add this value rather than a state monopoly whose managements have no capital at risk.

How would we establish a stronger presumption in favour of publication than that which currently exists?

Placr wish to support the creation of a Right to Data, which would force bodies to become efficient at data release to keep compliance costs down. This could be achieved by establishing data portals in each organisation and distribution partners where real time data needed to be re-distributed.

Is providing an independent body, such as the Information Commissioner, with enhanced powers and scope the most effective option for safeguarding a right to access and a right to data?

Placr believe that it would be effective to construct the PDC to be the regulatory body rather than ICO who are more concerned with privacy. The PDC will not be able to fulfill this role if it is trading in the market either within or outside the public task.

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