

**AN OPEN NATIONAL ADDRESS
GAZETTEER**

Responses received

APRIL 2014

Contents

Introduction.....	3
Responses on behalf of organisations.....	4
Advisory Panel on Public Sector Information (APPSI)	4
Association of Census Distributors (ACD)	6
Demographics User Group (DUG)	7
Health and Social Care Information Centre	8
LandInform	9
Market Research Society	10
Office of National Statistics (ONS)	11
Open Data User Group	12
PAF Advisory Board.....	15
Royal Mail	17
Royal Statistical Society.....	18
Responses from individuals.....	20
Individual Respondent 1.....	20
Individual Respondent 2.....	21
Individual Respondent 3.....	22
Individual Respondent 4.....	23
Individual Respondent 5.....	24
Individual Respondent 6.....	25

Introduction

An independent report for government on how feasible an open address gazetteer would be, written by Katalysis, was published on the 13 February 2014. Following the publication the Department for Business, Innovation, and Skills provided a period for interested parties to comment on the report. The period for comment closed on the 14 March to which 17 representations were received.

This document contains each of the responses in full with the agreement of their respective authors. All contact details have been removed to protect the identities of individuals. The responses have been separated into two; those representing the views of an organisation or group; and those provided by individuals. The responses have been ordered alphabetically.

The views expressed are those of the organisation, or individual to whom they are credited, and do not necessarily reflect those of the Department for Business, Innovation, and Skills.

Responses on behalf of organisations

Advisory Panel on Public Sector Information (APPSI)

Dear Sir,

APPSI response to Department of Business, Innovation and Skills (BIS)' Request for Comments on 'An open national address gazetteer'

This letter is written on behalf of the Government's Advisory Panel on Public Sector Information (APPSI)¹. It has been assembled following email discussions within the Panel. These discussions have not included two individual APPSI members – the author of the independent report to BIS or the Trading Fund representative on APPSI, both of whom are conflicted.

APPSI welcomes the report² as a constructive contribution to enhancing use of highly important digital data in the UK economy and public services. We note that discussions over address-related topics have dragged on for at least 15 years. As a result, the situation has become ever more difficult to resolve since it now involves revenues harvested by public sector bodies and by those which were such when the data were first assembled. We believe therefore that determined pragmatism is required to get to a solution which provides overall benefits to the public.

Assessing who benefits and who loses from making government data Open – and by how much – is fraught with difficulty. This question was addressed in a major APPSI seminar held in McKinsey and Co's offices on 28 January; the report of that meeting will be published in the near future. What follows takes account of the presentations and ensuing discussions, notably the conclusion that substantial benefits accrued from the release of Open Data, especially in the form of increased business efficiency and consumer surplus, although it was often hard to identify monetised benefits (or future revenues) with great accuracy. That conclusion applies particularly to addressing information, which is already used by a wide range of businesses, government bodies and the general public and which, if made more openly available, is very likely to generate public benefit greater than the cost to the public purse.

The Report sets out a range of options to address the problem of wider access to an Open Data Gazetteer. Of the seven alternatives listed, APPSI members believe that the approach widely used in the private sector to differentiate products by operating a Freemium model has many attractions. As proposed in the Report, the data set made available under this model would include individual addresses and their locational (grid) references plus postcode; the six week frequency of the existing commercial products would be down-graded to a year or perhaps even more and the resolution of the grid

¹ <https://www.nationalarchives.gov.uk/appsi/default.htm>

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274979/bis-14-513-open-national-address-gazetteer.pdf

references might be degraded e.g. to 10m. It seems likely that this approach will be opposed by the Royal Mail and by Ordnance Survey who will argue that it will lose them revenue. On the basis of past experience, we believe that these losses may be exaggerated. We suggest that any such response should be forensically and independently analysed by the regulator (OPSI) and the expert evaluation and conclusions published. If subsequently a public complaint is made then APPSI under its statutory role³ should review this evaluation and publish its conclusions. If the analysis shows that there is a real prospect of significant loss of revenue to the Royal Mail and Ordnance Survey, then (because of the particular importance of the dataset to a wide range of users) we strongly advocate that the Public Sector Transparency Board should consider *some* amelioration of the projected losses by subsidy from the funding available to it for facilitating expansion of Open Data. We believe this should be for a fixed period given that the likelihood is of increased usage of address data as a whole and of migration of some new users from such a 'Lite' version to more frequent and detailed, paid-for versions.

A technically similar approach is for government to commission (Option 7) an Open Data product. The Report favours this approach. Whilst there is an attraction to having a data set unambiguously owned by Government and distributed as Open Data, APPSI members are not clear on the practical advantages of this approach unless at least some of the data components are sourced from outside the existing Royal Mail and Ordnance Survey products. In the longer term this seems quite likely to be possible as addresses become commoditised and location references are collected on the Global Positioning System datum (readily usable with Google Earth). It may however also have some attraction in the short term as a tactical device and could be explored further.

In conclusion, the addressing data situation has festered for far too long. Address data and specific locations attached to them are part of Core Reference data sets recognised by government as a key component of our National Information Infrastructure (as long argued by APPSI). The report published by BIS gives us a chance to democratise access to addressing data and meet many of the Government's avowed intentions⁴. We urge acceptance of Option 6 or 7.

As ever, APPSI stands ready to engage constructively in bringing about a solution to the unhappy history of addressing in Britain.

Yours faithfully
David Rhind
Chairman of APPSI on behalf of the Panel

³ <http://www.nationalarchives.gov.uk/information-management/ifts/complaints-procedure.htm>.

⁴ "...a decision to treat addresses as Open Data will resonate with a series of government policy directions such as Open Data, Less Red Tape, Digital by Default, Innovation and Transparency. Similarly, it would be consistent with a general government drive to encourage re-use and a presumption that public sector data should be Open (free or at marginal cost), as reflected in the Open Data White Paper, Information Fair Trader Scheme, Exceptions to Marginal Cost Pricing, a National Information Infrastructure and the EU Directive on the Re-use of PSI. It would support the recent signature of the G8 leaders' Charter on Open Data.", Page 6 of the Report.

Association of Census Distributors (ACD)

BIS Policy Paper: An Open National Address Gazetteer Submission from the Association of Census Distributors

1. The Association of Census Distributors (ACD) was formed in 1993 as the Association of Census Agencies. The name was changed after the 2001 Census, when the term Census Agency was dropped by ONS.
2. The original purpose of setting up the ACD was to provide a forum for its members to meet for the purpose of negotiating with OPCS, the forerunner of ONS as the collector of the national Census of Population. Subsequently the ACD also represented its members in discussions with other data providers, such as Ordnance Survey and Royal Mail.
3. Current members of the ACD are:

Association of Census Distributors - Member Companies

Acxiom
Beacon Dodsworth
CACI Information Solutions
CallCredit Information Group
Experian
PitneyBowes Software (MapInfo)

4. The ACD has supported the concept of a National Address Gazetteer (NAG) since it was first mooted in late-2010. We have participated in various consultations regarding NAG, including the OFT consultation in January 2011 and the Public Data Corporation consultation in October 2011. We have also joined with the MRS Census & Geodemographics Group in its lobbying regarding NAG.
5. ACD members are heavy users of address data in their targeting and market analysis activities. While the majority of their clients are in the private sector, a growing proportion are public sector organisations. As you would expect, given the name of the group, we are heavy users of Census of Population data. We were keenly aware of the efforts of ONS to create an address database for the 2011 Census, and regretted that the combined address database that resulted could not be carried forward and form the basis for NAG. Clearly, the work that is being carried out by the ONS 'Beyond 2011' team will depend on an excellent future NAG, whichever option is favoured.
6. The ACD welcomes this report, which we consider to be very well researched and sensible in its conclusions. We agree with its recommendations in general, and believe that the Freemium approach in particular would be an elegant solution – and probably capable of speedy implementation. Clearly, excellent data quality is a sine qua non for this approach.

Peter Sleight, chair, ACD
Copies: ACD members

Demographics User Group (DUG)

To: BIS

BIS Policy Paper: An open national address gazetteer Views of the Demographics User Group

The Demographics User Group (DUG) represents 16 commercial companies – Barclays, Boots, Camelot, Centrica, Co-operative Group, E.ON, EE, GSK, John Lewis, Just Eat, Marks & Spencer, Sainsbury's, Serco, Swinton, Tesco, and Whitbread – which make extensive use of government statistics and geographical data to understand local markets and consumers, and take decisions about large investments in delivering better services. These are the tip of the iceberg of 2.3 million businesses in the UK, many of which can increase their efficiency, and grow, by using data gathered by government, which has the great advantage of consistent collection across the whole of the country.

We welcome the policy paper, which is valuable in summarising user needs and benefits, the current state of play regarding address files and their ownership, and in setting out future options.

It also reminds us of the sorry saga of the last 15 years, with data owners successfully resisting pressure by potential users, and observers such as the Public Administration Select Committee, and the Chair of the UK Statistics Authority, to behave in the public interest.

DUG has long advocated the creation of a definitive National Address Gazetteer database, particular benefits for commercial companies being fewer failed home deliveries, and better matching of product files in order to obtain a reliable single view of each customer. We were delighted when in 2010 NAG was announced, and its being made available free at the point of use for all public sector bodies under the centrally-funded Public Sector Mapping Agreement. However, we expressed concern that, for almost all other potential customers, the prices are prohibitive, and appear designed to protect OS's existing policy of setting high prices for a small captive market, extracting monopoly rent. We also expressed the view that the current pricing policy should at least be changed to one designed to greatly increase sales and use of this national asset by charging much lower prices.

Turning to the options outlined in the policy paper, we are not convinced that the Totally Open option would be accompanied by "many complexities and risks": rather, it needs a simple political decision to fund open usage, as has already been wisely done for the public sector. There is also a need to challenge and reduce the current cost base.

However, presuming that government will continue to allow the data owners' interests to trump those of the very many potential users (commercial, charities, academic, and the general public), we reluctantly see the Freemium model as a step towards the ultimate goal of an Open NAG.

Yours faithfully,

Keith Dugmore, Director

Health and Social Care Information Centre

Dear BIS,

Some quick comments. I was contacted to provide input to this document as the HSCIC.

Page 35

UPRN Availability – As the primary national reference for data linkage, it is important that the UPRN is in the public domain with no ownership constraints.

In all of the press and marketing speak from GeoPlace and Ordnance Survey, there is much talk that the UPRN should be the primary linkage mechanism across government. Well. This is all well and good but is not currently achievable without a massive, and long drawn out data exemption process. I, on behalf of the Health and Social Care Information Centre set about exempting the UPRN to be released as an additional field in our organisational Open Data products. This took a phenomenal amount of time to achieve a decision, which I attach. This is also referenced on page 48/49 of the report. Now, if everyone in Government has to go through this process, as it clearly states this particular exemption does not set a precedence, how can this be a good use of public money or a common sense decision? The UPRN should be Open Data. Absolutely. What is the point of it if not? There can be no loss of IP as the UPRN is useless without Addressbase to link to to reveal the address. Madness. There are another 60 or so data files that the HSCIC release on a monthly basis and I for one see no benefit in 60 separate exemption processes.

I would wholeheartedly support the proposal to move the UPRN into the public domain.

Page 38

5.1

Would Free Addresses Increase Usage?

Simple answer is yes. As an example, the NHS is redeveloping some key national systems, Choose and Book and the Spine to name just 2. Underpinning these national systems are patients and organisations' addresses. Paying for PAF, multiple times is nonsense. One single National Address Database with no additional royalties payable would ensure that the NAG is used in these national systems

Central Government PAF Licence

This has taken far too long to sort out. I consider it to be a disgrace. There is no reason why this couldn't have been sorted years ago. Nothing else to say on this point. Royal Mail have continually said in public that they are committed to this deal yet have done nothing about it.

LandInform

As someone who has worked in the national addressing field for some time I am pleased to be able to offer my views on the options presented in this report.

As a geographer and information management specialist I have been involved in a variety of projects over the past 16 years that have used address data in the assembly of national databases of land use, planning, environmental and property data. I conducted earlier independent reviews of address data and standards on behalf of central and local government in 2002 and 2006. Since 2003 I have worked on the development of the Scottish Assessors Portal and more recently on the 2011 Census address register and the DECC National Energy Efficiency Data Framework – all of which are underpinned by national address data. I am secretary to the AGI Address Geography Special Interest Group.

This is an excellent report with which I find very little to take issue. It offers a compelling argument for why government should now commission an open addresses product and presents a blueprint in outline for how this should be done.

Although the formation of GeoPlace and the creation of the National Address Gazetteer (NAG) in 2011 resolved many of the problems that had up until then plagued the development of a definitive national address database there remain significant obstacles. The duplication and inefficiencies in the way address data continue to be managed by and between the two main data suppliers largely stems from a desire to maintain the status quo and so maintain their existing revenue streams. While this is understandable given the current economic climate and the prevailing business models that OS and Royal Mail operate under it means that without some external pressure they are unlikely to abandon their inherently conservative stances and try something new. The development of open addresses may well be the catalyst that is required for OS and Royal Mail to innovate and in doing so widen the user base for address data.

A commissioned open address product that would evolve to become part of a NAG maintenance and distribution hub builds on the investment by local government and Ordnance Survey in GeoPlace and on the definitive national address register. It is crucial that the open address product is designed as an integral component of the NAG data model and utilises the UPRN for unique identification and cross-referencing. This will allow the open address data to be an integrated subset of the national address infrastructure and enable validated user feedback to be incorporated into the NAG maintenance model. It will prevent the open data product diverging from the definitive NAG.

The commissioned open address product is the most ambitious of the options presented by the report but it also offers the most and so has the greatest potential to realise significant benefit. It will require a managed and staged approach to reach its objectives. As the report notes it will require a dedicated governance structure and a quality plan for ongoing user engagement and representation. I fully endorse this option and the steps identified in the report to bring it about.

Andrew Harrison
Director, LandInform

Market Research Society

Dear Sirs

Re: BIS Policy Paper - An Open National Address Gazetteer: Views of the Market Research Society

The Market Research Society (MRS) welcomes the review of an Open National Address Gazetteer (NAG) and the opportunity to submit views. MRS supports the recommendation that there should be a freemium version of a NAG, speedily implemented for the economic benefits demonstrated in the review. MRS is the world's leading authority on research and business intelligence. MRS is for all those involved in generating creative and intellectual capital from marketing sciences, insight, research and analytics. With members in more than 60 countries, MRS represents, regulates and promotes those sectors providing world leading training, qualifications, content and skills.

The UK is the second largest market in the world for these research services. Full details about the MRS and its activities are available at: <http://www.mrs.org.uk> The MRS for a number of years has made the case for open data, and an open NAG in particular, as a key input to growth in the sector, illustrated by a submission by MRS in 2011 to the Public Data Corporation:

https://www.mrs.org.uk/pdf/MRS_CGG_response_PDC_consultation.pdf. MRS was consulted for the review through its Census and Geodemographic Group, an advisory body of MRS that has specialists in the full range of research and marketing activities, including geography and address databases, with an extensive network of contacts in government, universities and commerce. The policy paper is a thorough and balanced review, and MRS has no hesitation in agreeing with the overall message of a heavy reliance on address data and that open usage would result in substantial and valuable growth in use, and that a basic address product should be free to all users at the point of use while premium versions should still be sold. Within market research and market communications there would be new use of a freemium product, while established businesses with extensive use of address data would continue under present arrangements knowing that product quality - importantly including a freemium version - would be maintained; although MRS supports the recommendation that the current complexity of responsibilities for addressing information should be brought together in a single dedicated hub. The freemium option, apart from the status quo, offers least disruption to the production,

funding, PAF licensing, and current business use of addressing information, while making a significant contribution to the government's open data agenda with a very good prospect of stimulating economic growth. Not least for the interests of MRS members and commerce more widely is the prospect that the option could and should be speedily implemented, and we urge BIS to take all necessary steps to that end.

Yours sincerely,

Debrah Harding
The MRS Policy Unit

Barry Leventhal
Chairman

Office of National Statistics (ONS)

ONS strongly supports the view that addresses play a critical role in the way the nation runs - and that addresses should have a central role in the national digital infrastructure.

For the 2011 Census the lack of a single definitive national source of sufficient quality meant that we were forced to develop our own address list, drawing upon the best parts of the existing national address lists. We have been strongly supportive of more recent developments to establish Geoplace and use a similar approach to develop and maintain the national register going forward.

Whatever the approach taken to running the census or large scale surveys in future, a definitive national address register is certain to be a central requirement and we have been working closely with Geoplace and Ordnance Survey to ensure that this work will deliver our requirements. Addresses will play an increasingly important role going forward in helping to join up data sources and surveys and we support any step that can be taken to encourage and embed the wider use of such a definitive source of address referencing.

ONS has an established history in delivering definitive 'open' data - such as statistical data sets from the decennial Census, from Neighbourhood Statistics or more recently from our Open Geography Portal. Within the first year of its launch the Portal has led to a significantly increase in the uptake of referencing products - including its postcode data. These products are free at the point of use, up to date, definitive, and accessible in a variety of open formats.

We believe that the benefits and efficiencies that would arise from freely available national address gazetteer would far outweigh any costs. Freely available data are much more likely to be adopted by users and embedded in operational systems. A national register, free at the point of delivery will undoubtedly help in joining up services, increasing efficiency and reducing duplication.

We would recommend, however, that the scope of work to establish 'open data' in this area should be extended to include the identification (via attribution of the national address list) of particular types of 'communal' addresses such as hospitals, care homes or student accommodation. The identification and maintenance of definitive national lists (by those departments or agencies responsible for these topics) would increase efficiency, aid emergency services and reduce duplication of effort.

ONS strongly supports the principle of the national address gazetteer as 'open data' and the suggestion of further work to look at the exact requirement and options for funding. Further, we believe there is value in extending the scope of this work to consider how communal addresses are managed in the national list. We have strong interests and some experience in this area and would welcome an opportunity to contribute to discussion on the requirements, options and opportunities here.

Open Data User Group

1. Introduction

ODUG welcomes the report written for BIS by Katalysis Ltd (which we will refer to as ‘the Report’), on options for an Open National Address Gazetteer, as a positive step towards the Government’s aspiration, expressed in the Open Data White Paper⁵ to ensure that a single definitive National Address Register, the National Address Gazetteer (NAG) should be maintained.

The Report has been written at a time when data policy has been evolving. Most importantly the status of the Postcode Address File (PAF) has changed due to its sale as part of the Royal Mail privatisation. ODUG strongly objected to the Government allowing the PAF to be taken into private ownership and continues to believe that this was not in the national interest. This view has been vindicated by the findings of the Commons Public Administration Select Committee (PASC) whose report⁶ describes the sale of PAF by the Government as a mistake.

2. Terms of Reference

The Report had limited terms of reference so critical issues such as the full economic argument for maintaining a NAG and the cost of address maintenance were outside its scope, as was the issue of the ownership and associated Intellectual Property Rights (IPR) in address data.

The issue of what might constitute “a reasonable price” for the NAG or how it might be arrived was also outside the scope of the Report. The Government needs to reconsider whether it is reasonable to impose secondary costs for the wider economic use of core national data, already publicly funded to deliver essential public tasks.

It is also difficult to see how a sensible decision about how a single definitive NAG can be created, maintained and financed can be taken without a definition of the purpose(s) for which the NAG should be maintained and in the absence of realistic estimates of what would constitute reasonable costs for such an undertaking. The cost of addressing is crucial in the advice to Ministers. ODUG strongly advises that the Government should carry out an evaluation of the costs (including alternate funding models) and benefits which are derived from a NAG.

The Report therefore concentrates on the recent, often unfortunate and wasteful, history of different government agencies compiling competing address registers in the UK and on the muddled and complex maintenance procedures.

3. Options and recommendations

The Report offers seven options for the NAG, with the overall recommendation that government should make “some level of address data free at the point of use” (through Option 5) and sponsor “the specification and provision of an Open Addresses product which is a periodic snapshot of the current existing products” (Option 7).

ODUG’s feedback on each option is set out below:

⁵ www.gov.uk/government/uploads/system/uploads/attachment_data/file/78946/CM8353_acc.pdf

⁶ www.publications.parliament.uk/pa/cm201314/cmselect/cmpublicadm/564/56402.htm

Option 1. Totally Open – ***supported medium/long term***

Option 2. Evolving status quo – Not supported - does not meet the needs of the wider economy, restricts potential public sector efficiencies and growth and innovation opportunities, especially for SMEs.

Option 3. Extended bulk purchases – Not supported - does not meet the needs of the wider economy, restricts potential public sector efficiencies and growth and innovation opportunities, especially for SMEs.

Option 4. New charging models – Not supported - does not meet the needs of the wider economy, restricts potential public sector efficiencies and growth and innovation opportunities, especially for SMEs.

Option 5. Address as an Open Service – Not supported – does not meet the needs of the wider market for addressing data, particularly the innovation of integrated data products and services.

Option 6. Freemium – Not supported - the revenue stream from the ‘premium’ versions is unlikely to be substantial enough to support a useful free release of data.

Option 7. A commissioned Open product – ***Supported short/medium term*** and as a stepping stone to Option 1.

4. Further Comments

4.1. Data Quality

The report does not consider, in any detail, the issue of data quality and fitness for purpose. As one of the options offered is a Freemium model, providing a lower quality data set as a free product and a higher quality alternative for sale, it is unfortunate that neither data quality nor fitness for purpose have received more attention.

For example, PAF, the most widely used address data set, is not complete or reliable enough for any purpose other than the delivery of correctly addressed mail. Limitations of PAF undermined the 2001 Census. PAF is only adequate for domestic non-critical in-car navigation use and is unsuitable for mission critical despatching such as that required by the emergency services. PAF has serious limitations for addressing new properties and providing first residents with a definitive address to secure banking, utility or credit services. In short PAF, through first mover advantage, the robust protection and assertion of IPR, and the development of a network of value added resellers has dominated the address gazetteer market despite its significant limitations. This issue is not highlighted in the Report.

4.2. Definitive Data

The report uses the word “definitive”, quoting the Government’s aspiration, more than fifty times. Another term used more sparingly, but clearly equally important, is “authoritative”. Neither term is clearly defined in the Report, but ODUG’s view is that a NAG is *definitive* when it is the sole source of correct and officially acceptable versions of identifiers, or addresses that will be used for a particular purpose/s and *authoritative* because those who compile and maintain it have the sole statutory or regulatory authority to maintain it. In order to select an appropriate way of creating, maintaining, disseminating and financing a definitive NAG the Government must decide what public tasks the NAG will support, who defines what goes in it and who checks its quality. It is ODUG’s view that the process should be formally and independently regulated.

4.3. Pricing and monopoly supply

ODUG believes that if sufficiently strong regulatory steps are not taken to minimise the impact of the mistake of selling the PAF this has the potential to undermine the government's aspiration for there to be a single, widely used definitive NAG.

A definitive register is a natural monopoly. For that reason, because competitive pressure cannot determine the price, an independent regulatory mechanism is required to set the "reasonable price" that an "authority" can charge for its "definitive" register. The issue of what constitutes "a reasonable price" or how it may be arrived at appears to have been outside the scope of the report.

This is unfortunate as current legislation (Postal Services Acts 2001, 2011) put an onus on the Royal Mail to provide PAF to others at a "reasonable price". ODUG disagrees with Ofcom's view that it is acceptable for PAF to generate a revenue stream to recover its costs. ODUG believes, on the basis of professional evidence from a range of address data resellers and others, that Royal Mail's PAF operation is either seriously inefficient, or has non-PAF maintenance costs added to generate the current annual maintenance cost of £24m. ODUG further argues that these costs are integral to Royal Mail's core delivery business regardless of whether they supply PAF data to third parties or not. Therefore, the "reasonable cost" of providing the PAF data to others should be the marginal cost of distribution.

Also, Royal Mail recently⁷ committed to government, and publicly, that it would make changes to its PAF licensing regime to widen the potential use of the PAF. But their PAF consultation, which has been allowed to proceed unchallenged by Ofcom, is highly focussed on the use of PAF for deliveries and address list management purposes. It does not consider the potential underpinning nature of the PAF for all integrated digital products and services requiring an address component. Therefore, because no analysis of the total potential market for PAF data has been undertaken, the consultation is limited in its scope, and fundamentally flawed.

4.4. PAF alternatives

The importance of PAF as the backbone to a definitive NAG is overstated, and by implication overestimated, in the Report.

Royal Mail's business model allows current PAF licensees to use PAF to 'cleanse' their own (third party) address databases against the PAF. Royal Mail therefore accepts that alternate collections of address data, including postcodes exist and are widely used in their own right.

Although Royal Mail's current ownership of PAF as a database can no longer be challenged, postcodes form a core component of any definitive address gazetteer. ODUG believes that in any negotiation of a Public Sector PAF licence, or for the use of postcodes in a NAG which is built and maintained by Local Government and Ordnance Survey through GeoPlace, the Government should challenge the primacy of PAF, and GeoPlace and Ordnance Survey's position as value added resellers of PAF.

⁷ www.royalmailgroup.com/royal-mail-launches-consultation-simpler-postcode-address-file-licensing

ODUG urges the government to give consideration to the delivery of a definitive NAG based on a third-party postcode file, rather than assuming that PAF is the only option. The single limitation of such a file would be the inclusion of new postcodes as and when they are allocated for delivery purposes, by the Royal Mail. An issue which could be overcome easily by individual citizens and businesses, through the planning and land registration processes.

4.5. Products versus infrastructure

There is confusion, which emerges clearly from the Report, as to whether Government, and former government agencies, are creating address ‘products’ which can be packaged and sold or support paid for services; or whether they are maintaining a National Address Infrastructure as a core reference register and, if they are, whether that infrastructure is considered a public good.

The Report sticks largely to acceptance of the status quo where the two principal sources of addressing, PAF and OS AddressBase are considered to jointly make up the definitive NAG and appears to accept that these ‘products’ should underpin addressing in England and Wales. The report does not deal in any detail with the possibility of replacing the existing products with an open national address hub, which would expose and make available for use and re-use definitive and current address information for all government and public purposes. Such a hub would have the additional advantage, as a “one-stop-shop” for all address information, would allow errors to be identified reported and corrected quickly and easily and would significantly raise the quality of national address information. Such a hub, by minimising duplication of effort, could significantly reduce the cost of maintaining a National Address Infrastructure.

Open Data User Group

PAF Advisory Board

Independent advice on the Postcode Address File

OPEN ADDRESS GAZETTEER

This response is made on behalf of the Postcode Address File Advisory Board (PAB). We welcome the release of the report prepared by Kataysis and our earlier opportunity to comment during the fieldwork conducted by the study team (which is not acknowledged in the report, however).

The report makes an intuitive argument for a definitive address gazetteer for the United Kingdom; the appeal of being able to locate all property and immobile physical assets is appealing and the report makes the case that the compilation of a listing is possible using existing information, including the Postcode Address File (PAF). Nevertheless, there would be a tension between comprehensive coverage and definitive data – PAB members’ experience suggests that many commercial organisations would prefer smaller coverage that removed locations for which data was doubtful. It is unclear to the PAB why one perspective on how to resolve this tension should be subsidised by the tax payer

over another. In addition, governance arrangements would be particularly challenging if value for money in the cost of a 'free' product is to be achieved.

The most important point the PAB wishes to make is that the efficient delivery of mail and goods is crucial to the economic well-being of the country. An independent report the PAB commissioned in 2012 estimated the value of the PAF to the UK economy to be of the order of £1,000 million a year. Hence, it is important to keep in mind that a definitive postal delivery point file is not the same as a national address gazetteer (though it may contribute to the compilation of a gazetteer). Efficient postal delivery requires frequently updated and accurate granular information about the characteristics of the addresses citizens use for delivery of their post. In our view the continued separate existence of such a file is vital and PAF is best maintained close to an operational mail organisation, all of which are private firms in the UK that would not be covered by any presumption that public sector data should be Open Data. The PAB is currently engaged with Royal Mail to assign quality indicators to the postal addresses PAF contains. We consider such a development indispensable for better addressing and reduction in the costs of misdelivered mail.

Royal Mail earns around £27 million a year from licencing PAF users, on which its profit is about £2½-3 million. The PAB is currently pressing Royal Mail to identify options for reducing maintenance costs which account for about £24½ million a year. We wish to see this cost reduced and would look to Royal Mail to share the benefit realised with its PAF licence customers. We believe that this area offers good scope for reducing the cost of using high quality PAF data.

We are unsure about the projected benefits of an open national address gazetteer. Over the past year or so Royal Mail has experimented with the provision of the PAF file free of charge to certain specific groups (applications developers during the R&D phase, small charities and micro businesses). Take up of the free developer licence in 2013 was good. There were 637 registrations to take the data of which 54 had proceeded to some form of commercial status (split roughly 50:50 between direct end use and use via an existing Solutions Provider). It is still early days to assess the take up of the PAF file by small charities and micro businesses but our gut feel is that there is probably much more to be done to advertise these and the developer opportunities. However, we know of no example from the developer licence experience that might be termed a 'killer app' with vast economic potential. We note that the gains projected in the report are speculative; the fact that the McKinsey estimates are expressed in dollars leads us to wonder if they refer to the UK or to some other country. Further, as the authors correctly say, the report does not attempt to build a business case for a national address gazetteer, but to examine its feasibility.

Independent research the PAB commissioned in 2012 to examine the take up of PAF related products in SMEs pointed to lack of knowledge about what was available rather than complexity or price as the main reason where firms did not use accurate addressing data. Hence, the PAB believes that the case for a freemium model's benefit for the economy is as yet unproven. On the one hand some PAB members think a freemium model might drive up the quality of a paid for product. On the other hand others point to both the inherent risk of confusion over definitive addresses if there is more than one version of an address gazetteer, and the temptation for organisations competing on price to use data which are at best partially inaccurate. Indeed, our

experience of the use of older PAF data in some navigation devices and in the addressing of mail does not bode well in this area. The impact on mail delivery and other efficiency could be significant.

However, as far as the public sector is concerned we note that negotiations for a Public Sector PAF Licence, paid for centrally by Government, are at an advanced stage and that this arrangement would be game changing for the use of PAF in support of core public sector tasks, weakening the case for a national address gazetteer.

Yours sincerely,

Ian Beesley

Chairman, PAF Advisory Board

Royal Mail

Dear Sirs,

Royal Mail thanks BIS for the opportunity to comment on this report. We agree that the availability and provision of high quality addressing data is essential for the UK economy and we agree that the Postcode Address File (PAF) is key dataset in the provision of such data.

We feel that this Report does not adequately assess the feasibility of an Open National Address Gazetteer. The report, instead of considering how an Address Gazetteer could be developed and used, focuses on PAF and the provision of PAF to the market.

Royal Mail takes its responsibilities and obligations in relation to the Postcode Address File (PAF) very seriously. Without positive and progressive management of PAF, our operational ability to deliver the USO would be severely undermined.

Royal Mail recognises the importance that PAF plays as a vital dataset supporting and sustaining key parts of the UK economy and we are committed to its widespread availability at a fair price. On 13 February 2014 we published our revised proposals to simplify the PAF licence following our initial consultation last summer. The proposal aims to widen take up, encourage greater use of PAF, and meet the current and future needs of users, solutions providers and developers of PAF based products in today's marketplace.

To increase the use of PAF within the economy Royal Mail has, in the last year, extended free access to full PAF to eligible charities and micro-businesses. We have also given free access for over 700 people wishing to use PAF for development purposes. We have also only recently completed a comprehensive consultation with the specific aim of simplifying the licencing and pricing frameworks for PAF. Our changes make access to the highest quality, full PAF file easier for everyone. In completing the new licencing framework we have worked very closely with the Government to agree, for the first time, simpler access to PAF for public sector organisations for a centrally paid fee. Unfortunately, this report does not recognise all the changes we have put in place.

The key recommendation in the report is for “...data owners to elect to release a relatively basic product as Open Data that would satisfy a majority of the target users while leaving higher value products for sale to existing and future premium customers.” Backed by our own internal analysis and in our discussions with Government, we believe that this sort of “freemium-type” PAF product as described in the report will struggle to succeed as it would release poor quality data onto the open market. We note that this Report says that this would be an undesirable outcome.

PAF was designed initially to help Royal Mail identify the 29 million addresses that we deliver mail to daily. Today, in addition to that essential role, PAF has a value to the UK as a high quality dataset used by entrepreneurs to create new businesses and jobs in the UK. Our simple and inexpensive licensing ensures we can continue to provide PAF for those uses and our arrangements to allow free access to developers, micro businesses and eligible charities will widen PAF use across the UK. We look forward to working with BIS to sustain and develop PAF in the years to come.

Yours sincerely

Royal Mail

Royal Statistical Society

Royal Statistical Society response to the Independent Report on an Open National Address Gazetteer

1. The Royal Statistical Society (RSS) is both a learned society for statistics and a professional body for statisticians. It was founded in 1834 as the Statistical Society of London and became the Royal Statistical Society by Royal Charter in 1887. Today, the Society has more than 6000 members around the world. The RSS is active in a wide range of areas both directly and indirectly relevant to the study and application of statistics.
2. A national address register is one of the key components in an effective national statistical infrastructure. Statistical units, whether it be people, businesses or housing stock, are essentially linked to their geographical location.
3. For a considerable time now the Society has expressed concern about the non-availability of a single, well maintained and publicly available national address register. Repeatedly we have made our views clear regarding the inefficiency of the substantial work which has been undertaken to make ad hoc versions of such a register available as an enabler to deliver critical outputs. The best example of such effort is the work by the Office for National Statistics, which had to create a national address register for the 2011 Census, at a substantial cost and effort. This work is complex in terms of organisational boundaries and in terms of commercial charging mechanisms by organisations such as the Ordnance Survey or Royal Mail.
4. We fully agree with the case, made by the Open Data User Group (ODUG), to produce and release a free national address database. Whilst we recognise substantial work would be involved to manage the open availability of such a

database, it is clear the effort to make this data available would benefit a wide a number of agencies and deliver significant economic value.

5. Finally, we fully support the Conclusions and Proposed Actions set out in the Independent Report on an Open National Address Gazetteer, calling for a number of immediate and medium term actions. In particular, we are supportive of the recommendation to ensure an open address policy is created under a public sector Senior Responsible Owner, and extensive user consultation arrangements are in place to ensure the fitness for purpose of such a policy and the implementation of it.

John Pullinger President of the Royal Statistical Society

Responses from individuals

The following representations were received from individuals in response to the report. Contact details have been redacted under Section 40 – Personal Information of the Freedom of Information Act.

Individual Respondent 1

The report doesn't identify the 5 different sets of legislation that enable the numbering of property and the naming of streets, one each for Northern Ireland, Scotland and London plus two different sets of Legislation for England and Wales. Some features of this legislation are :

It doesn't allow the naming of property by local Authorities outside of London.

The legislation is permissive allowing Local authorities to name street and number (or name in the case of London) properties but does not require them to do so, for this reason large areas of Rural have unnamed streets that have properties on them.

None of the legislation enables Local authorities to enforce the numbering of sub buildings, this has lead for example to different bodies in Scotland to refer to the same property in multiple ways for example the Rear left hand flat at number 10 Rossie Place EH7 is referred to in the following ways:

GF2, 10 Rossie Place
2/10 Rossie Place
10/2 Rossie Place
2/0, 10 Rossie Place

amongst others.

Not having control of property names, failure to name streets and an inability to number sub properties leads to mis-delivery and failure to deliver

A Scottish Postwatch report from 2006 Identified the failure to number tenements as a significant issue, and the matter has been raised by Edinburgh Council on a number of occasions, but without enabling legislation nobody can act to fix this, the Post office blames local Government and vica verca.

This is not just a Scottish Problem but given the quantity of tenement style properties it is a greater problem there than in the rest of the UK. As well as issues with flat/tenement type properties there is a whole raft of what could be called Campus entities, such as universities, airports, large train stations, and shopping malls etc where the Local Authority has no right to name and number inside their boundaries.

A further problem is that there is no legislation that enables any UK body to name places other than streets, it seems to be assumed that place is fixed and whilst it is true that

places rarely disappear, most of the losses post Domesday being plague villages in the middle ages, it is not the case that boundaries are fixed or that there is no creation of new places. It is not uncommon for sub-districts in some cities to be referenced to landmark buildings often Public Houses.

Whilst it is understandable that Local and National Government would shy away from fixing boundaries and names to non administrative districts, since this will always cause a fair amount of disagreement, It is not reasonable that we do not have such names and boundaries even if individual properties might be in different "places" for different purposes. I for example live in Bassetlaw but my postal town is Newark in a different Local Authority area, and although my Mail comes from Newark I am nearer to two other Posttowns , Lincoln and Retford. So for mail I refer to Newark but when describing where I live to an acquaintance I will use Retford, or on some occasions Lincoln.

My argument is that without an underpinning of sensible legislation and a mechanism to enforce it we can not have truly definitive addresses, the text of the current legislation which includes parts of the 1847 town Improvement Clauses act, is substantially the same as the first legislation of this kind enacted in 1796 for use in Westminster. Nowhere in this or any supporting legislation is there a definition of any of the terms used, in particular road or street, and building or property.

If we recognise that place names, including individual addresses are essentially a human artefact and that they are confirmed in their existence by use, we need not only strong and modern rules for their creation and maintenance to ensure that usage is consistent but we also need that the definitive addresses so created are freely available to all. Not the 50 a day that the post Office will allow us to access, whilst this might help with my Christmas list it will not help in creating a framework for socioeconomic research nor will it allow me to properly question and analyse Open Data.

Regards

Individual Respondent 2

Dear Sir/Madam,

1. As the national lead for local government on information management and statistics between 1989 and 2009*, I was instrumental in the creation of BS766 defining addresses, the establishment of the Local and National Land & Property Gazetteers, and the first Service Level Agreement on mapping, and the creation of a company to market this, preferably in concert with Royal Mail and Ordnance Survey.
2. As recorded in the report, local government was very disappointed that attempts to put this vital and valuable addressing resource to wider economic and social benefit were frustrated over many years. Local Government therefore welcomed the Government's intervention that led to the creation of Geoplace, and the funding of the Public Service Mapping Agreement.
3. However as the request from the Open Data User Group and the Department of Business, Innovation and Skills' commissioning of the report on *An Open National*

Address Gazetteer from Katalysis Limited demonstrate, the present arrangement represents unfinished business.

4. It is widely recognised that Addressing is the most important Core Reference Set the country has, and not only should it be the basis of any National Information Infrastructure, but there is strong argument it should be part of Open Data to maximise its economic and social impact.
5. The Local Government Association (LGA) has long expressed its support for Open Addresses, as long as the costs of collecting, processing and managing the data as covered. As noted in the Katalysis report, the LGA believes that the costs could be reduced if Royal Mail - and Ordnance Survey - adopted different approaches. Similarly the response by the Advisory Panel on Public Sector Information (APPSI) suggests that Royal Mail and Ordnance Surveys costs (which seem to follow their income) may be exaggerated and include costs relating addressing to their other activities.
6. Based on the costs for local government, the actual net loss of revenue *might* be nearer £10m. rather than £35-40m. which has been suggested by other parties. As APPSI proposes, the costs could be forensically investigated by the regulator (the Office for Public Sector Information [OPSI]), to ensure that the Government and all parties to the issue had access to an independent analysis of the financial dimensions to the proposal
7. Whilst it is acknowledged that the Government is not looking to fresh expenditure at a time of austerity, the likely cost of moving to Open Data, or a Freemium approach (perhaps as an interim step) will be relatively small compared with the funding already committed to support the availability of the wider product set in the Public Service Mapping Agreement. For a relatively small amount, Addressing would not only be available to those organisations providing public services but outside the Agreement (e.g. housing associations), but to the wider business community, and indeed the wider public. A revamped Geoplace could be used as a vehicle to achieve this, protecting the Government and the taxpayer going forward. The frustrations, legal complications, delays and costs - leading to the inefficient use of imprecise locational information (e.g. postcodes) - would disappear, and the opportunities for business and economic growth and public engagement and satisfaction would grow.
8. Now is an opportunity, not to preserve the past, but exploit the future.

Individual Respondent 3

You have invited comments on the recently published Open Addressing Report. I was the Managing Director of Intelligent Addressing, Local Government's partner in developing the National Land & Property Gazetteer (NLPG).

My comments are as follows:

1. The essential problem for both Royal Mail and Geoplace are the commercial imperatives of protecting revenue. Neither organisation is responsible for the

benefits that can accrue to users from open addressing. This has been the bottleneck for the last 15 years.

2. It was hoped by some that the acquisition of the NLPG by Geoplace would go a long way to softening the commercial terms but it does not appear to have done so.
3. The commercial problems are compounded by the economics of address maintenance and the very attractive margins available on what is regarded by most as a monopoly activity. For example, the report correctly states that local authorities are the primary source of address change intelligence but receive only £1.00 per address from Royal Mail (there used to be about 500,000 address changes in a year). Since, broadly speaking, the PAF database only needs to vary when addresses change it is difficult for an outsider to comprehend how a revenue of £27 million per annum can be justified. The economics of Geoplace are better but can likewise be criticised.
4. There are clearly benefits that could be obtained from further rationalisation of the production processes and it may be that some legacy products could usefully be discontinued with resultant cost-savings.
5. The opportunity of data linkage is underplayed in the report and is a key area of benefit, especially for government and other large organisations.
6. The problem of out-of-date addresses is a very significant commercial cost for the whole of the UK and is also arguably underplayed in the report. The ability to update addresses instantly - or overnight - from a central hub (as was already technically available and in use in 2011 but at a prohibitively expensive cost for those outside local government) would be of very significant financial benefit to all commercial organisations.

Individual Respondent 4

Dear Sir/Madam

I have read with interest the report of making address data open. Working for a local authority in the team that maintains the gazetteer on a daily basis, I thought I would send you my thoughts on this proposal.

I welcome the freeing up of local government and Government data, for too long the tax payer has been paying for this data often more than once with through local government Council tax initially and then again as local government have been charged for the use of Postcodes, thankfully this now seems to have stopped.

I do have some cautious comments to add though, in the report it was mentioned that crowd sourcing of address mistakes would need to be considered, I feel that there would need to be a mechanism to ensure that any mistakes found would be forwarded to the local authority Street naming and Numbering team as this is the source for all address creation and maintenance.

As a Street naming authority, my colleague who is the Street Naming and Numbering Officer has found on many occasions that Royal Mail simply add and address to PAF, this practice must not continue and legislation would need to ensure this, all address creation should come from the Local Authority thorough it's Street naming and Numbering function, this will ensure there is only one point of entry for addresses. We have no issue with Royal Mail continuing to issue postcodes, we do have a fairly good relationship with the team that deal with the issuing in our area but, postcodes should be the only additions they make.

On the subject of Street Naming and Numbering, there is a definite need for the legislation that governs this process to be reviewed, there appear to be at least three Planning acts that cover this function and each authority is meant to use one only. This leads to not every authority following the same legislation, the rules need simplifying into one legislative document and surely if new legislation is to be drafted to open up the data, it seems the perfect time to approach this element of address creation. Many authorities charge admin costs for carrying out the Street Naming and Numbering function, we as an authority choose not to and I believe that in doing so we encourage householders to inform us of address changes, if authorities where made to charge for this function I feel there would be an increase in address changes not being notified to us, this element of any legislation would need careful consideration.

At present the way addresses are created and maintained by local government and then are fed to a national address gazetteer works really well and has taken many years to get to the current point of accuracy. Local authorities are the best source of addresses and this should continue, I do not believe that making the data free through open data initiatives would have any financial impact on local authorities, we already have the people in place and no additional resource should be required, what it may do is help to ensure that these roles are maintained within the local authority, which thankfully the PSMA seems to helping with.

I hope my comments above are understandable, the opinions I have expressed are my own personal opinions as an officer who works closely with the LLPG custodian in our authority.

Regards

Individual Respondent 5

Dear Sir

Just a few comments relating to the report.

One of the major problems even within organisations has been the multitude of address databases used which then means that it is difficult to then link different departments together based on the address.

If a simple address database including X, Y was made available and easily consumable (webservice would be ideal) then there would be a greater uptake in preference to manually typing in addresses, or one dept uses PAF, one uses another whilst another uses manual method.

Whilst hard to quantify cost savings now, I suspect the knock would be great. For example, in NI, with pointer used as the basis of valuation, then rating, when it comes to non payment of rates, it would be easier to check other organisation address databases e.g. utilities to see if there is any useage and therefore who the bill payer may be.

Investigating planning enforcement can involve enquiries with utilities which might be made more successful with a common address base.

Until there is a good, cheap or free data source, then too many organisations will do their own thing, making the ability to connect between or even with an organisation very difficult.

Regards

Individual Respondent 6

I'm I writing in response to the the report "An open national address gazetteer" as published at <https://www.gov.uk/government/publications/an-open-national-address-gazetteer>

I have the following comments and observations that I would like to make:

1/ I am strongly in favour of any moves towards opening up definitive addressing data in a way that makes it (a) free at the point of use, and (b) available for re-use at no charge under an open licence. The case for such a move is already outlined very well in the report, so I will not discuss that further here.

2/ Whatever licence the data is available under, it must permit the data to be combined with other open data and then re-published. To that end, the licence must permit re-use under at least the two most widely used open-data licences: CC-By [1] and ODC-By [2]. (Use under these licences will also cover use under CC-By-SA [3] and ODbL [4].) The Open Government Licence [5] fulfils this criteria, but it should be noted that the OS OpenData Licence [6] (enforced by OS on it's OS OpenData products, and via the PSMA) does not. The use of the latter would represent a significant restriction on downstream data use, and so should be avoided.

3/ The report's authors seem a little confused when comparing "free" with "open". On several occasions they state that "open does not necessarily mean free". This is technically correct, as you can charge someone a fee for providing them with data that they can then use under an open licence. However, doing so is rather counter-productive, as if the licence is truly open, the first buyer would then be able to give away the data to as many people as they liked for free. So in an efficient market you would only ever be able to sell one copy of the data. Perhaps the authors meant to say instead that "free does not necessarily mean open" -- meaning that you can give data away for free, but under a restrictive licence that prevents reuse. This is true, and has much more significant consequences for a National Address Register. It is vital that the data is "open" in the sense that it can be re-used without restriction.

4/ I was surprised to see that OpenStreetMap -- possibly the largest user and distributor of open geographic data in the UK -- was not on the list of organisations consulted during the investigation that lead to the report. It is a shame that their input was not sought.

5/ The revenue currently generated by selling address information is artificially high because of the monopoly created by LAs and Royal Mail only passing on the source address information to limited processors. The actual cost of the source information is relatively low -- I believe that LAs are paid 1 pound per address supplied, and it can't cost Royal Mail much to assign a postcode to each one.

Rather than coming at the transition problem by thinking about purchasing an open data product, or compensating an existing body for loss of income, the Government should instead think about simply contracting out the maintenance of a definitive national address register. The key data suppliers (LAs and Royal Mail) could be given a legal obligation to provide the required data on a cost-recovery rate, and the Register maintainer would be paid their economic running costs to maintain it and supply the basic data as Open Data. There would then be an open market, with anyone (the Register operator included) being free to enhance the data using other sources to produce value-added products.

Under such a scheme, I would envisage the costs to central Government being much less than under either of the Open Data options contained in the report -- which would involve purchasing the data at an artificially inflated price. Geoplace would of course be an ideal body to run the national address register on behalf of the Government. Maybe the threat of such a scheme (and the possibility they would not gain the contract) would be enough to lower the cost of the proposed open data product to a suitable level.

Commercial businesses are not normally compensated when legislative changes impact upon their business models. So I do not see why existing monopoly providers of address data should be compensated by a OpenData National Register removing the market for some of their products.

Yours faithfully,

[1] <http://creativecommons.org/licenses/by/4.0/>

[2] <http://opendatacommons.org/licenses/by/>

[3] <http://creativecommons.org/licenses/by-sa/4.0/>

[4] <http://opendatacommons.org/licenses/odbl/>

[5] <http://www.nationalarchives.gov.uk/doc/open-government-licence/version/2/>

[6] <http://www.ordnancesurvey.co.uk/docs/licences/os-opendata-licence.pdf>

© Crown copyright 2014

You may re-use this information (not including logos) free of charge in any format or medium, under the terms of the Open Government Licence. Visit www.nationalarchives.gov.uk/doc/open-government-licence, write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email psi@nationalarchives.gsi.gov.uk.

This publication is available from www.gov.uk/bis