



APPSI Secretariat

The National Archives • Kew • Richmond • Surrey TW9 4DU
Tel: 020 8392 5330 ext: 2252 • Email: secretariat@appsi.gsi.gov.uk

26 March 2009

Mr Ian Evans
Head of Commercial Licensing
Royal Mail Address Management Unit
4th Floor, Royal Mail
Slindon Street
Portsmouth
PO1 1AF

Dear Mr Evans

Royal Mail PAF Licence – recent consultation

I am writing to you as Chair of the Advisory Panel on Public Sector Information (APPSI), which is a Non-Departmental Public Body that operates from within the Ministry of Justice. Our role includes advising Ministers on how to encourage and create opportunities in the information industry for the greater re-use of public sector information; and also advising the Director of the Office of Public Sector Information and Controller of Her Majesty's Stationery Office about changes and opportunities in the information industry, so that the licensing of Crown copyright and public sector information is aligned with current and emerging developments.

We have recently become aware that Royal Mail has been consulting on new licenses for the Postcode Address File (PAF), and that several organisations have highlighted various possible consequences (some of which might be unintended) not only for the use of addresses, but also postcodes.

Market research companies are concerned that the proposed new licenses will restrict the use of PAF as a sample frame for surveys. This would also appear to apply to government social surveys. If this is the case it would have severe consequences for high quality research: we are told that there is no ready alternative. There are also fears that the correcting ("cleaning") of files, and other uses of PAF addresses, will be curtailed by the Royal Mail.

Representations have been made to us that the non-mail use of postcodes is under threat. These have become an essential method of linking and presenting (e.g. through adding

geodemographic neighbourhood codes to customer records and presenting results in map form) geographical datasets over the last 20 years. We were told by a major retailer that the terms of supplying the National Statistics Postcode Directory were having to be changed by the Office for National Statistics due to Royal Mail's new PAF licensing. As a consequence, it is claimed that a wide variety of established uses and services to the public are now in question, causing great confusion.

We understand that, at the meeting of the PAF Advisory Board on 26th February 2009, verbal reassurances were given that end-users will be able to continue to use PAF in established ways as long it is not used to create a new competitive file. Whilst this sounds encouraging, we note that ONS is now having to pay a substantial sum in royalties for the use of postcodes in its National Statistics Postcode Directory. We question whether this sits easily with the ring fencing of the operation of PAF within Royal Mail, ensuring that it can not be used as a revenue maximising device.

The representations made to us seem to have considerable substance. As a result, we are fearful that newly complex and ambiguous licensing will interfere with long-established use of a dataset which has become part of the national data infrastructure. I would be most grateful for a demonstration that this danger is recognised and will be avoided

Yours sincerely.

A handwritten signature in black ink that reads "David Rhind". The signature is written in a cursive, slightly slanted style.

Professor David Rhind
Chair, APPSI