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Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
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By e-mail: casework@ico.org.uk

28 May 2013

Freedom of Information Act Complaint

Dear Sirs,

I would like to submit a complaint in respect of the response I have received to a Freedom of Information request made to the Royal Mail Group in February 2013. Royal Mail has refused to provide the requested information and has confirmed that decision following an internal review.

I have enclosed a copy of all of my correspondence with Royal Mail. This includes e-mails and attachments, along with a screen capture of my original [request](#) which was submitted via the microblogging service Twitter.

My FOI request relates to information on the costs of maintaining the Royal Mail's Postcode Address File (PAF) that was redacted from an Ofcom [public consultation](#) published in February. These redactions were made at the request of Royal Mail. The consultation document is online here:

<http://stakeholders.ofcom.org.uk/binaries/consultations/postcode-address-file/summary/PAF.pdf>

I have also enclosed a copy.

Royal Mail has confirmed that it holds the requested information (with the exception of one figure on page 24 of the consultation document). However it has taken the position that the information is exempt from disclosure under Section 43(2) of the Freedom of Information Act - Commercial Interests, after application of the public interest test.

The basis of my complaint to ICO is essentially as set out in my internal review request letter dated 18 March 2013. It is my view that a correct application of the public interest test favours disclosure of the information.

I have considered Royal Mail's internal review response dated 16 May 2013. However in my view that response simply elaborates on the original refusal letter, and does not provide any additional information to strengthen Royal Mail's argument against disclosure.

In addition to the correspondence with Royal Mail, I have enclosed some background material on policy issues around the Postcode Address File and Ofcom's PAF Review. These issues are known to Royal Mail and alluded to in the correspondence.

My own view is that there is a paramount public interest in judging whether current pricing arrangements for PAF are "reasonable" as required in the Postal Services Acts, whether public funds (including Royal Mail's "own" funds) are being misused, and whether by implication Ofcom is failing in its duty as a regulator.

Please do not hesitate to contact me if you require any clarification of this complaint or if you think it would be useful for me to submit any additional arguments or material.

Thank you for your attention to this complaint.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Owen Boswarva', with a long horizontal flourish extending to the right.

Owen Boswarva