

15<sup>th</sup> March 2013

**Royal Mail Group**

Owen Boswarva

By Email: owen.boswarva@gmail.com

Information Rights Team  
(Freedom of Information Act)  
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Dear Owen,

**Re: Freedom of Information Act Request (Our Reference: DTUP-952HHC)**

I am writing in response to your recent request for information to our Digital Communications team on 15<sup>th</sup> February 2013. Your request has been considered under the terms of the Freedom of Information Act 2000. You requested the following information:

*"...@RoyalMail pls provide figures redacted from this doc <http://t.co/2uWcuqaB>"*

The document referred to in your message was an Ofcom review of the Royal Mail's Postcode Address File published on the 7<sup>th</sup> February 2013.

Much of the data in this document has been compiled by Ofcom from information provided to them by Royal Mail. When a request is made by Ofcom for information we provide it and issue guidance on parts that we feel should remain confidential and the reasons for this. The redactions in the document issued by Ofcom mainly relate to the costs to Royal Mail in relation to our Address Management Unit maintaining the Postcode Address File (PAF). We continue to consider that the redacted information should remain confidential.

The PAF is the central database owned and managed by Royal Mail that holds all the postcodes and postal addresses in the UK. Under the conditions of its licence, Royal Mail is obliged to maintain PAF and make it available to any person who wishes to use it on terms that are reasonable.

The Address Management Unit (AMU) is the team responsible for all matters relating to PAF. We consider that information that relates to the costs of this team, and specifically those costs which relate to the PAF, is commercially sensitive and exempt from disclosure

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under Section 43(2) of the Freedom of Information Act – Commercial Interests. Royal Mails address products are well respected and there is competition for the products and services offered by the AMU. We believe that information relating to the costs of the AMU and the PAF would be likely to be utilised by our competitors in order to understand how to replicate our products. Any disclosure may in turn reduce any potential income from selling our address related products and impact on our provision of the Universal Service.

Section 43(2) is a qualified exemption, and is therefore subject to the ‘public interest test’. We acknowledge that there is public interest generally in transparency and accountability. However, we do not believe that the requested information would significantly serve the interests of the wider public in this respect. Revenue streams, such as selling licences for use of the information contained on the PAF database is one way in which Royal Mail supports the six days a week universal service. We believe that the public interest in protecting the commercial interests of Royal Mail Group outweighs that of disclosure.

If for any reason you are not satisfied with this response, you do have the right to request a review. If you wish to do so please set out in writing your grounds of appeal and send to the Head of Information Governance, Royal Mail Group, Company Secretary's Office, 100 Victoria Embankment, LONDON, EC4Y 0HQ. An internal panel will then review the request, and you will be advised of the outcome.

If you decide to appeal and are still not satisfied with our response you also have a right to appeal to the Information Commissioner at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Telephone: 01625 545 700  
[www.informationcommissioner.gov.uk](http://www.informationcommissioner.gov.uk)

Yours sincerely

Daniel Tulp  
Information Rights Officer  
Company Secretary's Office