GI Consultation
Communities and Local Government
2/G9 Eland House
Bressenden Place
London
SW1E 5DU

11 March 2010

Dear Sir/Madam

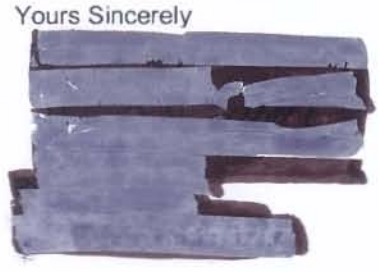
There follows a response to the public consultation document relating to the ***"Policy options for geographic information from Ordnance Survey"*** from TM Group (UK) Limited.

TM Group, which includes TM Property Searches and TM Search Choice, is an established search technology company committed to providing a cost effective online report service for everyone involved in buying and selling property.

TM Group utilises a variety of Ordnance Survey Map, Address and Gazetteer data in its report services and is an Ordnance Survey Certified Advanced Partner.

Initial review of the consultation document was undertaken by the custodian of the Ordnance Survey relationship within TM Group (UK) Limited and then circulated to the Commercial Director and a Senior Geographical Information Programmer for review and comment.

Yours Sincerely



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1.	**What are your views or comments on the policy drivers for this consultation?**
	It provides a succinct and balanced view on the main policy drivers behind the consultation; The importance of "Location Information" to both Public and Private Sector organisations in the delivery of products and services to the citizen in the UK and Europe is clearly outlined. The establishment of the Location Council is essential moving forward to supervise nationally the processes for efficient and consistent collection and management of Core Reference Geographies utilised in Location based services in Public and Private bodies, these core reference geographies take in more than just Ordnance Survey data. Therefore to meet the principle of 'collect once, use many times' there is a requirement to have a single "unrefined" data stakeholder of large scale topographic data from which other "refined" data services can be engendered. The conveyancing sector of the Land and Property Market has struggled for a decade, since the formation of the "National Land Information Service" and government licensed "e-conveyancing", with the challenge of how to cover the cost of topographic data usage when many or all end-users expect not to pay for what they consume, or if they do, pay once and then be allowed legally to use the "data" many times. The use or "misuse" of Land Registry plans has been evident in various business processes for many years where once the end-user has purchased the plan, containing Ordnance Survey topographic data, a perception remains that this is a multipurpose document that can be utilised many times in their business workflows and transactions. In relation to Innovation - Innovation may increase by the release of "free use" mid to small scale data for citizen centric applications, but where is the value to the citizen if the revenue source to cover the fixed and common costs is borne by those organisations providing services through the "unrefined" source topographic data? These costs cannot be borne by the service providers alone and will inevitably be passed on the citizen/consumer. It is put forward that encircling the map data with advertising may help offset some of the costs to information businesses in supplying Ordnance Survey data. Many information businesses provide application software, for "professional" use, which would not be usable if surrounded by advertising. For example, imagine creating this response document in Microsoft Word surrounded by advertising, it would not be conducive to work if Microsoft Word in day to day business was surrounded by advertising!
2.	**What are your views on how the market for geographic information has evolved recently and is likely to develop over the next 5-10 years?**
	The requirement for access to information with a location identifier has increased significantly and will continue to increase over the next 5-10 years. What has not necessarily increased is the general awareness as to whether the location information supplied and then used in services for identification, direction or display is "fit for purpose". Google and Microsoft are constantly pushing the boundaries for use of spatial information, on the web and in applications which is of benefit to us all. The end-user in using these services may be unaware that Google or Microsoft's underlying data is of varying quality, quite often

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	these organisations focus on quality in areas of Urban density. Providing location data to the UK citizen as a national geographic resource requires the information to be of a consistent standard and quality for the whole UK not where it is of greatest commercial benefit to the software/service vendor. The market will continue to evolve but the role of the Location Council must ensure the Core Reference Geographies and OS Large Scale Data are supplied to a known and consistent specification and standard. This ensures that all information services to the citizen receive the same recognised input data and therefore the citizen will have a choice of Third Party services whether these are Public or Private, or represent Urban, Rural or Moorland areas to the same consistent underlying data. This does not prevent the development of poorly implemented solutions, the old adage ***"you pays your money and takes your choice"*** holds true irrespective of the quality of the underlying data, it will however facilitate the market in determining "good" and "bad" solutions as the base data provided is of the same quality. Government has a duty of care in relation to the geographic information supplied and its quality for all citizens wherever they located or choose to reside in the UK.
3.	**What are your views on the appropriate pricing model for Ordnance Survey products and services?**
	In relation to the Land and Property sector in which TMG operates the SUC approach has operated well, knowing that information usage is charged at a consistent price and competitors in the same market sector are known to have the same operational costs in relation to the use of Ordnance Survey data. It provides a fixed price basis per transaction on which consistent business models can be built for the end-user charges based on known underlying data usage overheads. Primarily there are three uses of Ordnance Survey data View, Plot and Export and it is these uses that the appropriate pricing model should be based around. TMG has spent many years discussing with Ordnance Survey the "market" value of its data in the Land and Property sector and how the "view" value in the conveyancing (contextual) process differs from the same "view" value of data in a housing development (engineering/positional) project. It is not always the initial "view" of data and related initial transaction cost which is the issue, it is the ongoing use of the information in the business processes and workflows and the restrictions of use placed on it that need addressing. Many conveyancing transactions may be active for six to twelve months or more and it is hard to explain to and end-user that a further charge for "viewing" the information may be required after one, six or twelve months since the transaction creation and before completion of the end-user process. If the transaction pricing models are to change and the "view" price point increased significantly then TMG would have to review very carefully its use of Ordnance Survey data in its business activities and what value it may hold in the process.
4.	**What are your views and comments on public sector information regulation and policy, and the concepts of public task and good governance as they apply to Ordnance Survey?**

	This is introvert with a central government bias, not sure how objective the definition of "public task and system of good governance" can be based on the present Ordnance Survey board structure and use of the HM Treasury Shareholder Executive. Although bodies such as the Association for Geographic Information (AGI) have the ability to "lobby" Ordnance Survey and the Shareholder Executive there appears to be no "external" representation on the board enabling representation of the views of organisations such as AGI for example whom encompass a wide range of location based service sectors to the access and use of Ordnance Survey data.
5.	**What are your views and comments on the products under consideration for release for free re-use and the rationale for their inclusion?**
	The rationale for their inclusion is good and there is a balance in the data sets proposed. In relation to specific products, such as Code Point, it may enable smaller organisations the ability to interface more readily with other organisations using a common linked dataset. It may affect the volume of transactions of TMGs Mapping Service in certain market sectors. Larger clients may be more inclined to create their own "in-house" mapping tools before submitting requests through TMG to facilitate the rest of the business process which means a drop in revenue for the Ordnance Survey from TMG but potentially greater commercial benefit from increases in productivity. There is a general lack of knowledge in the B2C application end-user on the underlying data integrity and suitability for the application function. This is not just limited to the end-user, some software vendors create/derive commercial products from data that is not attributed sufficiently for the target market, best demonstrated by navigation systems directing heavy goods vehicles down country lanes. There are other "free" sources of boundary information for the UK but a general ignorance exists as to its probable inaccuracies as boundary data is temporal and many end-users are unaware of this and therefore misrepresentation becomes possible unless the information is obtained from a known creditable source.
6.	**How much do you think government should commit to funding the free product set? How might this be achieved?**
	To meet its objective of an April 2010 release of information the government should provide Ordnance Survey with guaranteed maintenance costs for at least three years. This would provide Ordnance Survey the opportunity to review and potentially overhaul its pricing and licensing models, with all its Commercial Partners, to better reflect these changes if sanctioned and remove any need for further government funding moving forward. Reserving the "perceived" higher accuracy products for commercial exploitation and revenue generation to cover the maintenance and associated costs for the products encompassed by Ordnance Survey Free is potentially one way to increase funding for these "free" products. Though it is felt that the transaction prices carried by the large scale products are already prohibitive and restrictive in relation to the amount of usage and onward transmission of data.
7.	**What are your views on how free data from Ordnance Survey should be**

	delivered?
	Wherever possible the delivery of free data should be through an online mechanism. Depending on the spatial extent of the free data required the initial supply may be on DVD. After initial supply all change only updates should be Online, if the User cannot obtain the information via the Online mechanism then a small charge should be made. Ordnance Survey or the data stakeholder must provide a notification service when updates become available. Ordnance Survey should either recommend or deliver a free "download manager" to make it as easy as possible for the citizen or community to obtain updates to the various datasets, managing the delivery of individual files and automatically recovering the process if the download is interrupted.
8.	**What are your views on the impact Ordnance Survey Free will have on the market?**
	It will reduce some marginal operating costs which are positive and the provenance of the "Free" geographic information is maintained under the Ordnance Survey "brand". In the Land and Property sector it should lead to better initial identification of specific land and property information, such as Local Authority. This potentially will lead to less ambiguity in the exchange of information in B2B services and provide improved services to the citizen by increased productivity. The improvements to service will only be maintained though if the maintenance levels for each of the stated products is sustained. The unknown is the impact this will have on existing Partner's long term due to no indication of how Government and Ordnance Survey recoup the lost revenue of ~£24M per annum which we assume from the positioning in the consultation document is not intended to be borne by the citizen/tax payer.
9.	**What are your comments on the proposal for a single National Address Register and suggestions for mechanisms to deliver it?**
	A single, definitive, national address register is required by commercial application and service providers in the Land and Property sector in the UK. TMG has been involved in address and associated location by spatial referencing for over ten years. TMG has worked on initiatives for the standard interchange and linking of information between Royal Mail, Ordnance Survey and National Land and Property Gazetteer to name but three address registers. These initiatives have always highlighted the entrenched positions of the various parties in relation to the components of an "address" (e.g. Postcode, TOID, and UPRN) and highlighted the unwillingness to concentrate on the goal of achieving a single address register. Section 7.41 makes interesting reading as Project Acacia was a similar attempt to unify various registers, which failed. All initiatives in the last decade have failed to reach a concord on how a single address register can be delivered so the statement here is treated with some scepticism. TMG is willing to participate in any initiative to obtain a single consistent Address Register. TMG

	has been involved in similar address harmonisation initiatives through organisations such as OSCRE (**http://www.oscre.org/** - formerly PISCES in the UK) for the benefit of the Conveyancing market. A mechanism for the initial delivery of this may already be taking place with the work undertaken by the Office of National Statistics (ONS) for the 2011 Census. ONS have tried to harmonise Royal Mail PAF and IDEA National Land and Property Gazetteer into a single address source to enable as many citizens as possible to be represented in the Census. It is said that this harmonised data will be "destroyed" after the completion of the Census which seems to be a gross waste of taxpayers' money in light of the fact that this could become a draft single address register. These two datasets are not without their shortcomings, especially in relation to business related address data but this must be seen as an opportunity through a defined central government role to establish the first draft of a single address register as one of the core reference geography managed by the location council.
10.	**What are your views on the options outlined in this consultation?**
	Option1: TMG believes that maintaining the current strategy does not meet the needs of the emerging spatially aware UK GI Market. The ongoing imbalance on the Tariffs between the Public and Private Sectors requires addressing. The limited ability to change licence terms and conditions is stifling creativity and the creation of new applications incorporating Ordnance Survey data. The lead-time in many commercial projects is three months from internal sponsorship to public release. Once the application has gone to market the potential advantage gain over a competitor is 3 – 9 months. Historically the contractual negotiations with Ordnance Survey have taken up to nine months to complete due to the complexity of the terms and conditions, coupled with the inability to creatively mix and match Ordnance Survey spatial products within a specific SUC. This lack of ability to mix and match is prohibitive, often resulting in the introduction of a new SUC/DDA just to include a specific product in an existing or new business process. **Option2:** TMG believes that due to irreversible nature of this option and uncertainty on the fiscal returns that Option 2 should not be hastily undertaken. There is considerable pressure from certain sectors to "free" access to all OS data but the large scale data is a core part of the digital framework for the UK, on which many public services and private businesses rely. The consultation surmises that innovation will increase under this option but TMG would contend that the one off charge may be prohibitive to smaller and medium sized organisations therefore reducing the number of innovators to a handful of large organisations, potentially only driven by financial gain and not serving the citizen wherever they are locate in the UK. TMG currently does not want to rely on a Third Party for its mapping requirements which are an integral part of its business processes. If the "significant one-off" charge is prohibitive then TMG would be forced to find an alternative mapping supplier, with associated integration costs and Service Level Agreement requirements. There also comes the uncertainty of management and frequency of updates to the underlying data in this scenario which is important in Land and

	property sector. The returns from this proposal are uncertain. Revisit - Section 8.17 is an area of concern, one of the fundamental constituents in the existing large-scale database is the data quality. This needs to be maintained to safeguard the quality of all "refined" and derived location products and services from the "unrefined" topographic data. Returning to a position where DataCo requires government funds to be available is a retrograde step for both Ordnance Survey and Government. **Option3:** This is the most balanced approach and allows the existing GI market to develop further allowing Government and Ordnance Survey to determine a long term plan for "access" to its data holdings. This option provides OS a period in which to complete the to revamp its Licensing arrangements with existing Partners and through these new terms open up new areas of innovation with Ordnance Survey data. Ordnance Survey Free – meets the initial clamour for free access to Ordnance Survey data and meets the MDPD requirements. Tariff rebalancing is required to allow private sector innovation as the current tariffs (along with licence restrictions) stifle new product and application development. It should be noted that whatever mechanism is employed the citizen could be required to pay more access fees either when sourcing information from Public or Private Sectors depending on where the potential increased costs are to be recouped from. Option 3 maintains the revenue stream releasing Government from any long term commitments to funding to maintain the large scale data holding. Option 3 has implications on government for additional funds to increase the speed of change at Ordnance Survey, a government commitment to provide the required additional funds must form part of any announcement that Option 3 will be the strategy applied moving forward. From a TMG perspective accurate geographic location information is imperative in the Land and Property market for the delivery of efficient services to the citizen when undertaking activities in both the Residential and Commercial Market sectors for the buying and selling of land and property. TMG believe that this can only be maintained by having a central body, like Ordnance Survey, in existence and responsible for the data capture and management of topographic and related spatial datasets. Provenance of the geographic information supplied and utilised in services to the citizen is essential in establishing a level of "trust" in the services provided by Public and Private Sector organisations and enables brand reputation to be established. The Ordnance Survey has an established brand and associated provenance for its location products and as such this should be maintained moving forward.
11.	**For local authorities: What will be the balance of impact of these proposals on your costs and revenues?**
	N/A

12.	**Will these proposals have any impact on race, gender or disability equalities?**
	No Comment

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