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15th March 2010

Dear Sir/Madam

This is a response to the Policy options for geographic information from Ordnance Survey Consultation (Product Code: 09VOED06189).

Stutchbury is an SME, established in 1996. We provide IT services to all sectors, from global enterprises to one person startups.

In recent years we have witnessed an increase in requirements for geographic driven applications – particularly on the web. We invested significantly in some geographic data sets, but unfortunately the highly restrictive licensing terms did not allow us to share that investment across our customer base. Individual customers simply could not pay these licence fees and we could not continue to risk the up front investment.

Fortunately, OpenStreetMap.org has allowed us to deliver a number of innovative products to our customers at a price they could afford. We contribute back to that community as much as possible.

This process has demonstrated our belief that free data enables both innovation and business to flourish. The restrictive and prohibitive licensing of geographic data by the big players stifles innovation in the sectors that cannot afford enterprise scale license fees.

We have answered the questions raised in the consultation starting on page 2, but have also summarised what we believe would provide the greatest benefit to the UK economy on page 5.

Yours faithfully,

Philip Fletcher

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Answers to direct consultation questions:

Question 1: What are your views or comments on the policy drivers for this consultation?

The historic practice of either not releasing (or releasing with charge) government funded data is unacceptable from a social and moral point of view. The current government's policy of releasing as much government funded data as possible should be applauded, despite reservations on the scope. It is most definitely a step in the right direction.

Question 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 availability of 'free' (gratis) geographic information, in the limited form of online maps by Google and others has awakened the social and business need for geographic applications. Prior to this, the cost of mapping was prohibitive for all but the largest companies, so the benefits failed to trickle down to SMEs and non-profit organizations.

However, the restrictive terms of so-called 'free' maps stifle innovation in the very areas of the economy that need it most: SMEs and startups. A growing number of these SMEs now actively contribute to openstreetmap.org, validating the notion that truly Free (libre) geographic information is needed to fulfil the needs of an information driven economy.

Applications based on Free geographic data, rather than free maps will provide an increasing value to the economy.

Question 3: What are your views on the appropriate pricing model for Ordnance Survey products and services?

All *data* collected by Ordnance Survey should be released under a fully free data licence. This would include the cleansed up raw node data, orthorectified aerial imagery and Code-Point.

All *products* and *services* created by Ordnance Survey should be priced according to the market value. Raster maps, consultancy services etc.

Question 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?

I believe it unhealthy for a taxpayer funded organization to try to compete in the open market as it is almost impossible to be perceived as competing fairly. Ordnance Survey enjoys a virtual monopoly on the collection of geographic data in the UK, together with a perceived 'preferred supplier' status to the public sector. This has, understandably, stifled any motivation for UK based competitors to invest in this market sector. It has also led to the absurdity of taxpayers and public bodies paying twice for the geographic information.

Question 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 English language unfortunately has only one word for 'free'. This deficiency makes it very easy to misunderstand (or misrepresent) the implications of the word. Any release of data should be free from all restrictions.

The products chosen for potential release do not always appear to provide the best value proposition.

The real requirement for the geographic data is to allow innovation in new areas – ones that are not well developed by Ordnance Survey, or ones that occupy a niche market that cannot be financially exploited at a national level.

It is the release of the underlying data that will promote growth in the sector, not just the release (or freeing of license terms) of the raster maps.

Question 6: How much do you think government should commit to funding the free product set.

The government already funds the vast majority of Ordnance Survey's activities, either directly or by payment of licence fees by the public sector. Any loss of revenue from the private sector would be offset by the reduction in cost in the public sector licensing and an increase in tax revenue from the companies able to create new markets from the released data.

How might this be achieved?

From *Figure 1: Structure of GI value chain*, the Data Provision represents 20% of the value of the GI chain. Even if Ordnance Survey incurred the entire cost of that 20%, the tax revenue from the remaining 80% would (in simplistic terms) fund the vast majority of Ordnance Survey's data provisioning role. In practice, the growth of the private sector GI industry, responding to the freeing of geographic data would more than compensate the Treasury's loss of income from Ordnance Survey's current pseudo business.

Ordnance Survey's ability to create excellent cartography from the raw data is recognized and respected throughout the world. This value added service should still be chargeable, even if the OpenSpace maps are free (they have to compete with Google *et al*).

Question 7: What are your views on how free data from Ordnance Survey should be delivered?

Following the fine example of Free software, the internet would be the most cost effective method, under a free data license (Creative Commons licenses are for copyright works, not data). Mirroring on public (university) and private servers would reduce the incurred overhead.

For all datasets, diff files should be made available to reduce bandwidth usage for both the producer and the consumer of the data.

Physical copies should be available at the cost of the media plus time to burn.

Question 8: What are your views on the impact Ordnance Survey Free will have on the market?

Provided the correct data is released, the geographic sector of the economy will be able to create innovative products and services based on that data. This will give the UK geographic market a much needed shake up, allowing SMEs and startups to compete with the entrenched players.

Question 9: What are your comments on the proposal for a single National Address Register and suggestions for mechanisms to deliver it?

The UK post code is another fine example of why publicly collected data should not be entrusted to a private sector organization. The value to the economy as a whole (and therefore income to the Treasury) far outweighs the value to the individual organization. I would suggest a one-off payment to the Post Office to resolve this.

Question 10: What are your views on the options outlined in this consultation?

I have reviewed many, many proposals in my professional life any this one appears to have changed little from the norm. We appear to be being steered toward Option Three, a compromise. As with all compromises, it leaves everyone feeling, well... compromised.

It would be far more productive to base the options on the needs of the market first, and the needs of Ordnance Survey second. After all, taxes are collected for the greater good, not simply to keep to keep HMRC employed. The same should be true of mapping. Ordnance Survey's role should be the collector (and collator) of cartographic data, but unlike HRMC, they could also retain a revenue stream from the consultancy and value added sector.

Question 11: For local authorities: What will be the balance of impact of these proposals on your costs and revenues?

N/A

Question 12: Will these proposals have any impact on race, gender or disability equalities?

The release of data has provided evidence of racial bias and will continue to be used by minorities and their champions to expose inequality.

Example: <http://bit.ly/cfJe5F> "GIS mapping technology is helping underprivileged communities get better services — from education and transportation to health care and law enforcement — by showing exactly what discrimination looks like."

Summary

What should be released:

Data. All cleansed and tagged vector data collected by Ordnance Survey in the Data Provision section of Figure 1: Structure of GI value chain.

Aerial Imagery. The release of orthorectified aerial imagery would result in an explosion of new innovation as individuals and SMEs create niche markets from the data that is not currently mapped by Ordnance Survey.

Post Codes. The digital economy relies on the ability to uniquely identify resources, as demonstrated by the Uniform Resource Locator (URL) at the top of every web browser. Post Codes are geographic URLs for the layman. Postzon/Code-Point is the equivalent of the Domain Name System (DNS), mapping post codes to longitude and latitude. As with the domain name to IP address lookup of the internet, this information should be freely available to all.

What should have less restrictive licensing:

OpenSpace. A map is to geography as a dictionary is to literature. The suggestion that a trace plotted on a map is derived data is as absurd as saying this document is owned by Collins, because they created a dictionary of the words used. OpenSpace is competing directly with other commercial 'free' web-based maps, but should be delivering more freedom for businesses requiring UK mapping data.

What should remain as commercial products:

Maps. Yes, really. With the exception of OpenSpace (because it already has direct 'free' competition), the cartographic value added to the base data by Ordnance Survey is second to none. However, with the release of the data and aerial imagery, equally exceptional maps can be created by SMEs for particular market sectors, creating real competition and an expansion of the sector.