

11<sup>th</sup> September 2013

**Royal Mail Group**

Mr John Gow

By Email: request-172932-a7d29af6@whatdotheyknow.com

Information Rights Team  
(Freedom of Information Act)  
2<sup>nd</sup> Floor  
Royal Mail Sheffield  
Pond Street  
SHEFFIELD  
S98 6HR

foi@royalmail.com  
www.royalmail.com

Dear Mr Gow

**Re: Freedom of Information Act Request (Our Reference: MTEE-9AKCN8)**

I am writing in response to your request for information dated 13<sup>th</sup> August 2013. You requested an up to date list of postbox locations from Royal Mail's Collections Management Database. Specifically, you requested an up to date version of the information provided in response to a previous FOI request in August 2012 including 'all boxes currently being cleared by RM on the CMD'.

Your request has been considered under the terms of the Freedom of Information Act 2000. Please find attached an up-to-date copy of the information from Royal Mail's Collections Management Database including box type and last collection times for all postboxes in the CMD.

Although information disclosed in the past did include Easting and Northing references, all current location reference or coordinates data held in the database is considered to be exempt from disclosure under section 43(2) of the Freedom of Information Act – *Commercial Interests*. This information has therefore been withheld on this occasion.

Information is exempt from disclosure under section 43(2) if it would; or would be likely to; prejudice the commercial interests of any person. Royal Mail has obtained its own postbox location data using its own business resources and continues to invest in maintaining and updating the information. This information could not be reproduced by others without significant time and resource. The up to date information has a commercial value to Royal Mail which would be undermined by its release. Releasing the information would be advantageous to other companies who could utilise the current data for creating or updating their own products, websites or phone applications with no benefit to Royal Mail. This would be likely to prejudice the commercial interests of Royal Mail.

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Royal Mail would be denied the potential for cross marketing and promotion of other Royal Mail products and Services if its customers chose to access this information from third parties. At least one third party company has sold a phone application which provided post box location information to users – no income from this application was received by Royal Mail. When considering your request, we took into account an earlier ruling by the Information Commissioner. In a previous request for information held in the collections management database, the Information Commissioner decided that section 43(2) was engaged with regard to information which concerns or reveals the location of postboxes<sup>1</sup>.

Section 43(2) of the Act is a qualified exemption, and therefore subject to the 'public interest test'. We acknowledge that there is a public interest in general transparency and accountability. However, we do not consider that the information in question would further public understanding in this respect. The location data in no way relates to the management of public mail services – it is purely geographic location information. We believe that there is public interest in enabling access to daily mail collections. However, we believe that this is met through the prominent location of post boxes and the fact that we have already disclosed the street/road location for post boxes. Whilst some people may have a specialist interest in this information, most of Royal Mail's personal customers would not need to pin-point the precise location of every post box in the UK on an electronic map.

Allowing third parties to utilise Royal Mail's own accurate and up-to-date data for the benefit of their own products and web-based tools would place Royal Mail at a commercial disadvantage. We believe that there is strong public interest in maintaining a level playing field for commercial activity which would be harmed if rival companies were given instant access to Royal Mail's information for their own use. Royal Mail like any business operating in an increasingly competitive and challenging environment needs to protect its commercial interests. We believe that the location reference data has a commercial value to Royal Mail which should be protected. We believe that there is strong public interest in the commercial viability of Royal Mail and that there is significant public interest in Royal Mail being commercially successful in order to maintain provision of the universal postal service. We therefore believe that the balance of public interest lies in maintaining this exemption and withholding this particular information.

I am sorry your request cannot be met in full but hope that the up to date information from Royal Mail's Collections Management Database is useful to you. 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 write to the Head of Information Rights at the address above. An internal panel will then review the request, and you will be advised of the outcome.

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<sup>1</sup> Information Commissioner's Office Case Reference: FS50319573

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If, having requested an internal review, you 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  
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