



Commission for  
**Communications Regulation**

## Consultation Paper

### Follow Up on Postcode Symposium

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All responses to this consultation should be clearly marked:-  
“Reference: Submission re ComReg 03/138” as indicated above,  
and sent by post, facsimile or e-mail, to arrive on or before,  
**6<sup>th</sup> January 2004**, to:

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## 1 Foreword

Throughout the world, as Post Offices began to automate their sorting offices from the 1960s onwards, the need for a postal code that enabled each postal item to be sorted to its destination became an imperative. The spin off benefits came later, both for the postal sector in terms of stimulating the direct mail market, and its use by other operators and by other services such as the emergency services, economic analysts, health and local government and many other private sector businesses.

By the time An Post came to implement its automation programme in the early 1990's, optical machine reading technology (OCR) had advanced to such an extent that it was considered feasible by An Post to dispense with a public postcode. Nevertheless to transfer the knowledge of each postperson into a machine code based on an OCR reading of the address on an envelope proved a formidable challenge for An Post. The initial Irish automation was confined to Dublin, where a majority of mail is prepared by businesses and it sought to sort the mail only to the post-town. This programme has now been extended to the whole country and will involve OCR sorting of most mail to the level of the delivery postperson's route.

In all countries, a key issue for postage service providers and other service companies is the establishment of the exact correct address. Ireland provides a larger challenge than many countries in that some 40% of addresses are not unique. For example, the Ordnance Survey Road Atlas of Ireland lists 285 places in Ireland beginning with Bally, including 5 Ballyduff, 4 Ballyglass, 3 each of Ballybrack, Ballydavid, Ballynamone, Ballynakill (and one Ballynakilla) and Ballynahown (and one Ballnahow). Many people living in an Irish townland have the same family name which can cause confusion in terms of delivery of services. Several townlands in the same county may have the same name.

In more recent times, businesses and residents of Dublin are asked to use a District number. But district numbers may not be enough even in urban areas. In some cases it is still necessary to use a locality name, eg if you live in Pembroke Cottages in Dublin 4, the postman still needs to know whether it is the Pembroke Cottages in Ringsend or the one in Donnybrook.

A key difference between the code that An Post applies to mail sorted by the OCR machines, and that used by many countries, is that the random number assigned to each delivery point is not known by the consumer. This random number doesn't automatically tell you where the address to which it relates is located. It is not intuitive and even those businesses who buy it from An Post do not find it meets their purposes to the same extent as a publicly available code. Whether this current geo-directory system is adequate to provide for the level of liberalisation in the Irish postal market needs to be considered and a question is posed below on this.

Given the development of technology, it no longer appears necessary to rename every road and number every building, so that the concern that publicly available post codes would threaten traditional names is no longer valid. They could include a townland or alternative cultural distinction if need be.

If everyone were aware of their unique exact address what benefits would accrue? What would be the impact in relation to the following:-

The speed at which the emergency services can get to an emergency depends, inter alia, on how quickly they pin-point where they are needed.

As database technology advances, economies of scale mean that mail processing is being increasingly concentrated into major centres - for example, by An Post. In many cases ordinary citizens are increasingly seeking services over the internet, for example from outside the country. It is important that the addresses given by people who are seeking to purchase goods on the internet or over the phone for example can give an address that is immediately verifiable by the seller. Rapid address systems can identify exact addresses from postcodes immediately and should increase the user friendliness of these services. Is this benefit significant? If there were a postcode to what extent would the current extra costs incurred by Irish companies providing such services be reduced?

Unique exact addressing on the basis of public post-codes reduces the potential for error in using personally given addresses. For example a woman from Co Limerick having a breast check might give an address in Ballylanders at her local clinic. She does not want to find out later that the results have gone to Ballylanders in Co Cork.

Epidemiological and other social and economic research can be conducted on a regional or sub-regional basis, enabling better information to be gathered on potential problems and their evolution and response to interventions designed to eliminate them. This helps in devising better health care and other economic and social programmes.

In other countries, it has assisted the development of direct mail which is a growing element in overall mail, which helps in supporting the universal postal service. The direct mail service in Ireland is underdeveloped.

Finally, simple, intuitive postcodes for example those with a code similar to that used for car number plates might be useful and easier for the general public to remember. However, the simpler they are, the less useful information they may contain in identifying exactly a specific address.

Should these issues be addressed now and what is the appropriate solution? What are the costs involved and how would they be carried? We would be very pleased to receive any comments you may have on the issues raised in this paper or on other aspects of the matter. We will publish a report in early 2004.

**Etain Doyle,  
Chairperson.**

## 2 Background

On Monday 24 November 2003, ComReg held a Symposium on Postcodes which has stimulated an interesting debate. ComReg has published the presentations given at the symposium on its website as ComReg 03/136 and CP 17 to CP 24. ComReg would like to follow on from the symposium by issuing a report on the matter in the New Year. To help us in this task ComReg would greatly appreciate it if interested parties could forward to us their views on the issue. Although all comments are welcome, in order to provide some focus for the debate we have provided a list of questions below to facilitate the discussion.

There are already a number of substantial databases in existence which include locational and personal data: for example An Post's geo directory database as well as those databases being used by major utilities such as ESB, in addition to data sources such as the electoral register or the census. While all must have at least a fair degree of overlap in terms of their data sets, all are intended to serve different purposes. It was notable at the symposium that the various attendees had different ideas as to what a postcode system could achieve. It is also notable that traditionally the postcode systems in other countries were designed with the needs of postal operators in mind and not to meet broader needs.

Some of the possible applications of postcodes which were identified included the following:

- Sorting and delivery processes of the postal operator.
- Develop some segments which hitherto have remained underdeveloped e.g. direct marketing.
- Assist in pinpointing exact locations which benefits emergency and other utility services.
- Enable accurate addresses via automated rapid lookup systems which are increasingly used for ordering over the phone and internet.
- Provide a valuable basis for social and economic statistics for regional and sub-regional analysis vital to the identification of specific health and environmental problems for example and to their tracking over time.

The term postcode is used in this paper to cover a national publicly available coding system for addresses. The original postcodes in other countries were short alpha/numeric codes, but now technology may facilitate alternative systems. The current An Post system is a non-public code used for internal An Post operations and is available for sale to others.

Against this background ComReg suggests the following questions are of relevance:

### 3 Consultation Questions

In answering the following please provide reasons and justifications for your answers.

Q1 What do you see as the advantages and disadvantages of introducing public postcodes in Ireland?  
Please include any economic or other relevant information with the reply.

Q2 Do you think that the implementation of a postcode system will benefit the consumer and the emergency services in terms of the elimination of error by pin pointing exact locations?

Q3  
(a) Have you ever experienced difficulty in ordering goods/services on the internet because it was essential to provide a postcode? How did you resolve this?  
(b) Have you ever received a letter/package addressed to someone else with a very similar address to your own? Do you believe that the existence of a postcode will help overcome this?

Q4 If there was a postcode used by An Post and other institutions would you use it?

Q5  
(a) To what extent does the An Post geo-directory contribute to quality of service in sortation and distribution?  
(b) To what extent will a public postcode enhance or diminish this?  
(c) To what extent will the An Post geo-directory code meet the needs of the liberalised market in respect of sortation and other services?

Q6 While the level of detail of any postcode will depend on costs, there will be trade-offs between the ability of the system to be stable over many years and its complexity, between the inclusion of town lands and the length of the code etc. it would nevertheless be useful to gain some understanding as to what level of detail do you consider is required in respect of the different purposes you have referred to under question 5 - to each building in all parts of the country: by DED or whatever.

Q7 If a postcode system were to be implemented, how should this be done and by whom? Who should manage it on an ongoing basis?

Q8 Are there any other comprehensive or near comprehensive national address databases using identification codes in addition to An Post and the ESB?

Q 9 Do you agree with the above outline identification of the uses to which a public post-code system should or could be put? Would you add to this list? If so, what?

Q 10 To what extent do you think that any of the problems outlined could be resolved by other systems - including those of An Post/ESB or possible Revenue/Social Welfare codes?

Q 11 If a public postcode system were to be introduced, who do you consider should pay for it? Should it be paid for having regard to likely users? Beneficiaries? Other?