

[Respondent provided this non-confidential summary of its response and asked for its company name not to be published]

*Overall I believe that an open data approach at this stage would be undesirable, because I believe the overriding effect of such an approach would be to flood the market with free apps. Removing the need for a commercial license would lower the bar too much. This would have a negative effect on the average rail traveller's experience as the proliferation of free apps would result in the dilution of the offerings available and make it difficult to quickly and easily find the few high quality, reliable and effective apps, which would be lost amongst the chaff.*

*I would also have concerns about the subsequent impact on levels of service of the RTTI feed due to so many free apps. I am already receiving complaints from my users about the service not responding at peak times, and I'd imagine such issues would be seriously exacerbated if access to the feeds was unfettered. There would also be no automatic monetary input on NRE's side for investment in infrastructure to support the increased load.*

*Finally of course there are the negative impacts on existing app sales and developers' income. The combination of effort in obtaining a license and the significant work involved in designing, developing, marketing and supporting an app constitutes a substantial investment of time and money which takes a long time to recoup from the limited revenues of the App Store, especially once license fees have been paid. When National Rail Enquiries own free app was released - the only free RTTI app on the App Store to date - the effects were notable, with app revenues reduced by almost 50%. Free access, and the inevitable proliferation of free apps, would serve only to reduce revenues and return on investment even further. The developers who invested their time and money and entered the market chose to do so according to the rules as they stood at the time. If an open data approach was going to be used it should have been used from the beginning; I think it would be most unfair to move the goalposts in such a way now.*