

Federation of Business Information Services
Föderation für Wirtschaftsinformationsdienste E.V.
Federation des Services d'Information Economique



Please reply to
Prière de répondre à
Bitte Antwort an
Secretary General of FEBIS
c/o Verband der Vereine Creditreform e.V.
Hellersbergstr. 12, D-41460 Neuss
e-mail: Info@febis.org

September 24, 2008

Javier Hernández-Ros
Head of Unit

European Commission
Information Society and Media DG
Access to Information Unit
Rue de la Loi 200
B-1049 Brussels

Reference: On-line consultation for the review of the PSI Directive

Dear Madam or Sir,

Please find FEBIS (Federation of European Business Information services)' comments on the on-line consultation for the purposes of the review of the Directive on re-use of Public Sector Information (PSI). I would like to draw specific attention to the results of our study which we performed in 2006. Let me summarize the main relevant points regarding charges and prices which should be regarded at:

- The access to public information has to be paid in most cases: either as a flat fee, fixed costs or as a fee per inquiry.
- The access costs influence the competition among the credit reporting agencies and on the pricing because they influence substantially the final price of an information credit report.
- It should be noted that business information companies cannot charge all costs to the end-user in all cases.

founded 1973, registered amtsgericht frankfurt/m., germany
represented in all European countries

- Free access to public information is not a fast-selling item! Given the fact, that end of 2006 nearly 70% of the requested companies complain further bottlenecks for the development of their business through existing private and public legislations or those to be expected in the near future.
- FEBIS remarks a need for having simply and standardized access to public information on the international. Currently, each company needs to get public data by its own in order to fulfill the requirements of the national markets.

Let us state an example in Germany where business information companies have problems to get relevant information from the public sector regarding information about people who have moved. The governmental registration offices are obliged to give the information about for example the new address of person to anybody who is asking for this information. Lawyers are usually looking for debtors and will get the information about the debtor from the registration office. Business information companies do the same and did have the information until now. But since nearly two month business information companies do not get the information anymore. The access to this information is ruled by law. Nevertheless the registration offices deny the right of the business information companies to have access to the information of the office.

FEBIS will perform a survey on this topic among the FEBIS-members in order to analyse if a discrimination comparing the users of the registration offices information can be seen in other European countries and to in order to generate representative results on a European level in the development of the business information sector.

I propose providing you with a summary of the overall results of this Survey at the early beginning of 2009.

We are looking forward to hearing from you.

Yours faithfully
Secretary General of FEBIS



Prof Dr Helmut Rödl