



# **Ofcom ‘Call for input: The future of the universal postal service’**

**A response from the  
Consumer Council for Northern Ireland  
3 April 2024**

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## 1. Executive summary

The Consumer Council welcomes the opportunity to respond to the Ofcom 'Call for input: The future of the universal postal service' (Call for Input).

Postal services remain an important method of communication for consumers. Throughout our response we highlight key points, based on research we have conducted with Northern Ireland consumers on how the postal services Universal Service Obligation (USO) can evolve to meet changing consumer needs.

Northern Ireland has unique challenges compared to the other United Kingdom (UK) nations with higher levels of rurality, a higher proportion of non-internet users, a micro-business economy, and sharing a land border with the Republic of Ireland.

Within our response there are a number of key points we raise:

- We encourage Ofcom to consider Northern Ireland's unique position, and subsequently the Northern Ireland consumers' unique experience, in any potential USO changes.
- It is important that any changes to the USO, particularly regarding frequency and speed, considers the practical impacts that may impact on consumers and how these can be mitigated through engagement with bulk mail providers.
- We encourage Ofcom to consider the financial implications on consumers in any changes to the USO and ensure appropriate safeguards remain in place, particularly to protect consumers in the most vulnerable circumstances.
- We would welcome Ofcom undertaking further research to identify how potential changes to the USO will impact consumers, small and medium-sized enterprises (SMEs) and bulk mail users, and how these impacts may be mitigated.
- We urge Ofcom to evolve existing services within the USO, such as post restante, to meet the needs of vulnerable consumers such as those who are homeless or fleeing domestic abuse, to have safe access to post.
- We encourage Ofcom and Royal Mail to continue to horizon scan and monitor external and environmental triggers that could result in a significant change in demand of postal services.
- We encourage Ofcom to consider how consumer protection can be enhanced in an evolution of the USO.

We would welcome further engagement and collaboration with Ofcom to provide the Northern Ireland consumer perspective in the evolution of the USO.

## 2. About us

The Consumer Council for Northern Ireland (Consumer Council) was established in April 1985 as a non-departmental public body (NDPB) under the General Consumer Council (Northern Ireland) Order 1984<sup>1</sup> (The Order).

We are Northern Ireland's statutory consumer representative body and our principal statutory duty is to safeguard their interests. We operate under our sponsor department, the Department for the Economy (DfE), on behalf of the Northern Ireland Executive.

We are an insight-led evidence-based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

Our statutory powers cover consumer affairs, energy, transport, water and sewerage, postal services and food affordability and accessibility.

These legal responsibilities are drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding. The work we carry out also aligns with a number of the Articles in the Protocol on Ireland and Northern Ireland<sup>2</sup> (NI Protocol).

Our non-statutory functions educate, empower and support consumers against discriminatory practices in any market through advocacy work, as well as education and outreach programmes covering a broad range of topics including consumer rights, safer finances and a more sustainable energy future.

In everything we do, we prioritise consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

We have responsibilities under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998, ensuring government policies recognise consumer needs in rural areas, and promote equality of opportunity and good relations across equality categories.

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<sup>1</sup> [General Consumer Council \(Northern Ireland\) Order 1984](#), UK Parliament

<sup>2</sup> [Protocol on Ireland and Northern Ireland](#), House of Commons Library

## 2.1 Postal Services

Alongside our statutory obligations under The Order, the Consumer Council has certain functions in relation to postal services with the Department for Business and Trade as the partner Department, who fund our consumer advocacy work in Northern Ireland.

The Public Bodies (Abolition of the National Consumer Council and Transfer of the Office of Fair Trading's Functions in relation to Estate Agents etc) Order 2014 transferred National Consumer Council functions for consumer matters in relation to post in Northern Ireland to the Consumer Council.

The Order transfers to the Consumer Council certain functions of the National Consumer Council under the Postal Services Act 2000, the Consumer Estate Agents and Redress Act 2007 and the Postal Services Act 2011, which are all UK acts.

The Consumer Council therefore took on the functions of the National Consumer Council (which was abolished) relating to consumer matters in Northern Ireland for postal services.

Our work in postal services focuses on carrying out research, influencing policy, providing advice and information, and investigating complaints made by consumers in vulnerable circumstances, and gives us information gathering and investigation powers to help fulfil this statutory function.

## 2.2 Consumer Protection Principles

The Consumer Council uses eight guiding principles to assess where the consumer interest lies, and to develop and communicate our policies, interventions and support.

**Figure 1: Consumer protection principles**



They serve to protect consumers, setting out minimum standards expected from markets when delivering products or services in Northern Ireland.

They frame our policy position and approach to addressing emerging detriment and resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.

## 2.3 Super complaints

We are a designated super-complaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013.

Under both Acts, the Consumer Council can, if we believe any feature or combination of features of a market in the United Kingdom is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to the following regulators:

- Civil Aviation Authority
- Competition and Markets Authority
- Financial Conduct Authority
- Office of Communications
- Office of Gas and Electricity Markets
- Office of Rail and Road
- Payment Systems Regulator
- Northern Ireland Utility Regulator
- Water Services Regulation Authority

Under the Gas and Electricity Licence Modification and Appeals Regulations (Northern Ireland) 2015, we can appeal to the Competition and Markets Authority if we believe a modification by the Utility Regulator to the licence of a gas or electricity provider is detrimental to the interests of consumers.

## 3. Consumer context

Before beginning our response to Ofcom's 'Call for Input, we feel it is important to highlight key considerations of the USO and the Northern Ireland consumer position. We have responded directly to the questions posed in the next section.

### 3.1 Universal Service Obligation

The USO is a 'one price goes anywhere' principle of affordable postal services to all UK addresses, including postal consumers in Northern Ireland. This requires Royal Mail to deliver letters to every address in the UK, six days a week, at a uniform price, and parcels five days a week.

The USO in its current form comprises of minimum requirements set out by Parliament in the Postal Services Act 2011<sup>3</sup> (the Act) with the scope of services and other details being set by Ofcom in both secondary legislation and regulatory conditions.

The USO sets out the standards and principles for secure access to postal services at an affordable price. The key features are as follows:

- At least one delivery of letters every Monday to Saturday to every address in the UK and at least one delivery of other postal packets every Monday to Friday.
- At least one collection of letters every Monday to Saturday and at least one collection of other postal packets every Monday to Friday.
- A service of conveying postal packets from one place to another by post at affordable, geographically uniform prices throughout the UK.
- A registered items service at affordable, geographically uniform prices throughout the UK.
- An insured items service at affordable prices.
- Free end-to-end services for legislative petitions and certain services for blind and partially sighted people.

The Act requires Ofcom to provide a description of services to be provided as part of the USO. Ofcom details the scope of the USO through the Postal Services (Universal Postal Service) Order 2012<sup>4</sup>. This order sets out the requirement for the USO to include:

- Two delivery speeds of the largest volume, main USO products: First and Second Class.
- Quality of service targets.

Royal Mail Group (Royal Mail) are the largest postal operator in the UK and the only one which currently provides UK wide end-to-end letter delivery services. Royal Mail are the designated universal service provider and are required to deliver a range of postal products across the UK to homes and businesses at an affordable price.

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<sup>3</sup> [Postal Services Act 2011 \(legislation.gov.uk\)](#)

<sup>4</sup> [The Postal Services \(Universal Postal Service\) Order 2012 \(legislation.gov.uk\)](#)

## 3.2 Northern Ireland context

Before we set out our response to the questions posed, we would like to highlight the unique consumer landscape in Northern Ireland by way of providing useful context to our response.

Northern Ireland holds a unique position in the UK and represents:

- 3% of the total UK population (c1.9 million vs c67 million)<sup>5</sup>.
- It has double the number of citizens living in rural areas (36%) compared to England (17.1%) and Scotland (17%)<sup>6</sup>. We know rurality can heighten vulnerability in some markets, including postal services.

The geographic and demographic differences of Northern Ireland consumers compared to their counterparts in Great Britain (GB), outlines the importance of parity and protection of the postal service for consumers in this part of the UK.

Its geographic location means that whilst being part of the UK, Northern Ireland does not share a land border with the other UK nations. Yet, it is the only part of the UK to share a land border with a European country, namely the Republic of Ireland. This outlying location has shown to create logistical challenges for postal services and reinforces the importance of having USO protection such as uniform pricing.

In February 2023, the UK government published the Windsor Framework Agreement<sup>7</sup> which includes changes to the current arrangements for sending parcels from GB to Northern Ireland. The new arrangements will take effect in September 2024 and the implementation of any new arrangements should be considered as part of the USO review.

Since January 2021, the Consumer Council has monitored as accurately as it can, the number of GB retailers that have ceased to deliver to Northern Ireland citing EU Exit as the reason<sup>8</sup>. As of January 2024, we are aware of approximately 81 to 92 GB businesses that do not deliver to Northern Ireland, citing EU Exit as the reason for non-delivery.

## 3.3 Micro business economy

Northern Ireland is a micro business economy.

The Northern Ireland Inter Departmental Business Register (IDBR)<sup>9</sup> states:

- 89% of Northern Ireland have less than 10 employees.
- Just over 2% of businesses having 50 or more employees.

Micro businesses and many SMEs can often act like consumers and their experiences mirror those of many consumers in multiple markets. They share similar problems and concerns, and operate at similar levels of market engagement and understanding, and redress.

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<sup>5</sup> National Online Manpower Information System (NOMIS), Total Population, 2021

<sup>6</sup> NI: Northern Ireland Statistics and Research Agency (NISRA), NI: In Profile, November 2022. England: Department for Environment, Food and Rural Affairs, Rural population and migration, October 2021. Scotland: Scottish Government, Rural Scotland Key Facts 2021, February 2021.

<sup>7</sup> [The Windsor Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/the-windsor-framework)

<sup>8</sup> [Overview note: GB retailers not delivering to Northern Ireland -January 2024 | Consumer Council](#)

<sup>9</sup> [IDBR\\_PUBLICATION23.knit \(nisra.gov.uk\)](#)



### 3.4 Household income and expenditure

Northern Ireland has the lowest levels of discretionary income<sup>10</sup> in the UK, with disposable income for the average household at £103 per week compared to a UK average of £220.

The Consumer Council has monitored household discretionary income, particularly for the lowest earning households, since 2021. Our most recent bulletin of the Northern Ireland Household Expenditure Tracker<sup>11</sup>, covering July to September 2023, found:

- 50% of Northern Ireland households have less than £90 per week after taxes and essential spending.
- Our lowest earners, Quartile 1, have an average gross household income of £14,087.66.
  - Their income after tax is 7.3% lower (257.84) compared to the UK (£278.02).
  - They have less than £32 per week after paying taxes and paying for essentials.
  - They spend 53% of their total basic spending on food, rent, utilities and transport.
  - Their discretionary income has halved since our first report in Q1 2021 (£64.02).

We also conduct quarterly Consumer Pulse surveys a demographically representative sample of 1,000 consumers. Our latest report, published in December 2023<sup>12</sup>, found:

- Over half (53%) felt their household was worse off compared to 12 months' ago.
- Over a quarter (36%) felt their household would be worse off in 12 months' time.
- 19% said they had £50 or less each month after paying for housing and essential bills.
- 36% said they had £150 or less each month after paying for housing and essential bills.
- 37% said their mental health had been negatively affected by their financial situation.
- Three quarters (75%) agreed they try to stick to a budget.
- However, nearly half (48%) found dealing with financial matters a burden.
- 59% said they had to cut back on essentials after paying rent/mortgage/overdraft/loans.

This highlights the continued pressures that households across Northern Ireland are facing.

### 3.5 Digital exclusion

On a UK level digital exclusion remains an issue with around one in twenty households having no access to internet<sup>13</sup>.

Research from the Northern Ireland Assembly Research and Information Service<sup>14</sup> shows how the region continues to have the highest proportion of internet non-users in the UK, at 14.2%.

This sets out the uniqueness of Northern Ireland consumers compared to the rest of the UK, and the challenges faced from future migration to digital services and delivery models.

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<sup>10</sup> [Asda Income Tracker: September 2023](#), Asda, October 2023

<sup>11</sup> [Q3 2023 - Northern Ireland Household Expenditure Tracker | Consumer Council](#)

<sup>12</sup> [Consumer Pulse Survey Q3 2023 | Consumer Council](#)

<sup>13</sup> Ofcom, Review of Second-Class safeguard caps 2024: Proposed price caps for Second Class universal services, 2023

<sup>14</sup> [An overview of the Digital Divide in Northern Ireland - Research Matters \(assemblyresearchmatters.org\)](#)

### 3.6 Consumer Council research on postal services

The Consumer Council has undertaken a number of key research projects in recent years on postal services. The consumer insights from this research are outlined below and form the basis for our response to the questions posed in Ofcom's 'Call for input: The future of the universal postal service'.

We acknowledge the changing landscape of how people communicate, with digital spaces altering how we interact with each other. Post, and the physical delivery of this service, remains a vital part of the UK's national communications infrastructure and a key form of communication for certain groups of consumers.

The Consumer Council commissioned quantitative research in 2020<sup>15</sup> titled: 'The Universal Postal Service and Northern Ireland consumers'. This gathered consumer perspectives of the importance of the minimum requirements of the universal postal service in Northern Ireland. The research methodology consisted of:

- An online survey with 1,014 adults aged 16+ living in Northern Ireland participating.
- The demographically representative of the Northern Ireland population by age, gender, social grade and local councils.
- The sample included representation from vulnerable consumer groups such as lower earning households, those aged 65 and over, living in rural areas, or living with a disability or long-term illness.

The research found that:

- Outside of the safeguards provided by the universal postal service in the unregulated parcel market, Northern Ireland consumers are susceptible to detriment in terms of higher prices and lack of choice.
- In Northern Ireland, the universal postal service was of significant importance to consumers in vulnerable circumstances.
- Many consumers believed a 'track and trace' option should be included as a feature of letters and parcel services.

A recommendation from this report encouraged Ofcom to revisit its 2017 decision to consider a track and trace feature on USO parcel products.

The Consumer Council also commissioned research in 2023 into the views of consumers on how potential changes to the USO may impact on them. This was qualitative research titled: 'Qualitative study on the impact on consumers of changes to Royal Mail's universal service obligation'<sup>16</sup>. This research is due to be published in Quarter 2 2024.

The research methodology consisted of:

- 11 focus groups with 78 consumers from across Northern Ireland.

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<sup>15</sup> [The Universal Postal Service and Northern Ireland Consumers | Consumer Council](#)

<sup>16</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

- Each group focus group represented one of Northern Ireland's eleven local government districts (LGD).
- Two of the groups (Fermanagh & Omagh, Newry, Mourne & Down) focused solely on rural residents, with all other groups contained a mix of rural and urban residents.
- Four groups were made up of vulnerable people (a vulnerable person was defined as someone who met at least one of the following criteria: disabled or chronically sick; of pensionable age; on a low income).
- With a further two groups including at least two vulnerable people.

Targeting these groups of consumers across all the LGDs in Northern Ireland enabled us to get a comprehensive representation of all six socio-economic groups (SEG): A, B, C1, C2, D and E. SEG is a means of classifying respondents based on the employment status, occupation and working pattern (full-time/part-time) of the head of household.

The research highlighted a number of key findings:

- How the postal service remains an important method of communication for consumers.
- It is particularly important for consumers in rural and remote areas, and for vulnerable users who might otherwise be at risk of social and/or economic exclusion.
- For some more vulnerable participants, there was an emotional connection with their postal delivery person, who may be the only person they see on a particular day, an interaction to which they looked forward to.

The postal service is an important channel for SMEs and market-place sellers to conduct their business activities. As previously mentioned, Northern Ireland is a micro-business economy, with 89% of its businesses classified as micro businesses<sup>17</sup>. The research also highlighted key points from consumers who earned an income by selling products on various marketplaces. This feedback highlighted:

- The reliability and affordability of Royal Mail was important to them.
- They commented on having to pay for postage upfront and being out of pocket until the package was delivered to the recipient.
- Given the current cost-of-living crisis, being out of pocket for extended periods of time was not sustainable for them.

While public bodies are increasingly taking steps to encourage citizens to interact with their services online, it is likely that post will remain an important method of communication for the foreseeable future. Ofcom state in this Call for Input that:

*“More than eight out of ten addressed letters are sent by large organisations such as the NHS and banks”.*

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<sup>17</sup> [IDBR\\_PUBLICATION23.knit \(nirsra.gov.uk\)](#)

The qualitative research which we commissioned in 2023<sup>18</sup> found that, in relation to older participants that participated in the research, there were a number of specific concerns this group of consumers shared regarding potential changes to the USO.

Key points included:

- They were nervous about being forced to adopt online paperless alternatives to letters.
- They were worried about missing bill payments, not being able to keep on top of their banking.
- They were worried about missing medical appointments as a result of not being able to get to grips with such systems.
- They were not confident in their ability to access letters online, with some not having any online access at all.

The Consumer Council published a report on 'Consumer Access to Postal Services at the Post Office Network in Northern Ireland'<sup>19</sup> which looked at the opportunities and challenges to consumer access to the postal network.

The research presented how the Post Office network provides consumers across the UK with vital access to a range of highly valued essential services. These include:

- Access to the postal service.
- Access to basic and personal banking facilities.
- Access to various government services.

Key findings from the research include:

- Rural post offices make up most of the network in Northern Ireland.
- Nearly two thirds (65%) of the network consists of rural branches which is significantly greater compared with the proportion of the rural UK network (54%).

Additionally, our research shows the importance of post offices to those living in rural areas to provide access to postal services. For instance:

- 81% of rural consumers say access to a post office is important when deciding to use Royal Mail.
- 77% of rural consumers said they used a post office to send letters and buy stamps.
- 75% of rural consumers said they used a post office to send parcels.

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<sup>18</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

<sup>19</sup> [Consumer Access to Postal Services at the Post Office Network in Northern Ireland | Consumer Council](#)

## 4. Our response

The Consumer Council welcomes the opportunity to respond to the Ofcom Call for Input. In particular we are grateful to Ofcom for facilitating meetings with partner organisations to better inform understanding of this process.

We ask our response is considered alongside the insights we have provided in Section 3, and have highlighted in each response, the corresponding consumer protection principles set out in Section 2.2.

### 4.1 Response to Call for Input questions

**Question 1: Do you agree that we have identified the correct aims, supporting principles and features of the USO? Do you consider that these should continue to be respected as far as possible when assessing potential changes to the USO?**

The Consumer Council agree with the aims of the USO that Ofcom have listed in the Call for Input. These aims are listed as:

- To promote social cohesion.
- To promote economic growth and facilitate key interactions between citizens and state.

We agree with the supporting principles which are listed as:

- Universality.
- Affordability.
- Uniform pricing.

Universality, affordability, and uniform pricing are key principles of the USO. These principles set out to ensure:

- That everyone has access to a national network regardless of where they live and work.
- That access is not prevented by the pricing of postal products and ensuring that consumers and businesses are not disadvantaged by their location are critical elements in making the USO work for everyone.

The Consumer Council commissioned research in 2023<sup>20</sup> with Northern Ireland consumers, titled: 'Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation'. Key findings from the research showed how:

- The rising cost of stamps was preventing some older participants from using the universal postal service.
- However, many participants were reassured that Royal Mail would never differentiate between different parts of the UK when it came to pricing and uniform pricing across the UK was considered very important by participants.

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<sup>20</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

We also agree with the features of the USO that Ofcom have listed in the Call for Input. These features are listed as accessibility, reliability, timeliness and security, and are identified by Ofcom as being crucial in ensuring the USO meets its intended aims.

Our previously referenced research found, across the focus groups, participants felt that the main benefits of the universal postal service were:

- Frequency.
- Convenience.
- General reliability.

The research found that the frequency of the service essential for those who received a significant number of medical appointments through the post.

The Consumer Council conducted quantitative research in January 2024 using an Omnibus Survey<sup>21</sup>. The survey focused on consumers in Northern Ireland experiences of parcel delivery services. Key findings from this research highlighted:

- 89% of consumers had experienced an issue with parcel delivery in the last 12 months.
- 63% stated that a parcel was left at an insecure location around their property in full view of others, e.g. at their front door.
- 39% of respondents stated they have experienced parcels being left at insecure locations by Royal Mail over the past 12 months.

The research findings highlight consumers experiences which relate to the feature of safety. We plan to commission research in the 2024/25 postal services forward work programme to further our understanding of Northern Ireland consumers experiences of final mile delivery issues.

Based on evidence from our research we believe the aims, principles and features of the USO must continue to be upheld, when assessing potential changes to the USO.

**This position supports our guiding consumer protection principles of access, choice, safety, fairness and representation.**

**Question 2: Do you agree with our assessment of the direction of change in postal needs of residential (including vulnerable) users and SMEs? Are there other factors relevant to their future demand which we have not considered?**

The Consumer Council acknowledges the decline in letter volumes as presented in the Call for Input, which highlight letter volumes have declined by nearly 50% since 2011-2012 to 7.28 billion items in 2022-2023, with a consistent downward trend.

We also acknowledge that, as presented in the Ofcom Call for Input, a contributing factor to this decline is being driven by digitalisation and e-substitutions. We understand that this is not a UK specific issue as research conducted by Copenhagen Economics shows this is in line with international trends<sup>22</sup>.

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<sup>21</sup> The Consumer Council Parcel Delivery Services February 2024 (not yet published)

<sup>22</sup> [Main Developments in the Postal Sector 2017-2021 - Copenhagen Economics](#)

Alongside the decline of letter volumes is the growth of the parcel market with a contributing factor being the change in consumer behaviour, particularly during the Covid-19 pandemic, with an upwards trend in the parcel market.

In considering the decline in letter volumes we would like to highlight that Ofcom's 2023 quantitative research<sup>23</sup> titled: 'Consumer survey research on post'. This highlighted:

- The importance for consumers to have letters delivered to their home 6 days a week has reduced since 2020 (63% vs 68%).
- The importance of letters being delivered to their home on Saturdays had also declined (58% vs 63%).

Although this highlights a reduction from previous research, it shows that:

- Almost two-thirds of those who participated in the research thought it was important to have letters delivered to their home six days a week (63%).
- Roughly six in ten (58%) think delivery of letters on a Saturday is important.

These figures represent a majority share of consumers and highlights the importance consumers still place on postal services, alongside delivery frequency and days of delivery.

As previously outlined, the Consumer Council commissioned research in 2023, titled: 'Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation'<sup>24</sup>. This gathered views of Northern Ireland consumers on how potential changes to the USO may impact them, and found:

- For many participants from rural areas the convenience of being able to leave packages out for their Royal Mail postal delivery person to collect.
- This was of particular benefit for those who found it difficult to make it to the Post Office to drop packages off.
- Those from rural areas believe there is a sense of community surrounding the Post Office.
- Post Office staff were considered knowledgeable about the products and services and were believed to be able to offer advice on the most appropriate and cost-effective means of utilising these products and services.

This shows the strong correlation and connection between the rural post office network and access to the universal postal service for Northern Ireland consumers.

As previously mentioned, Northern Ireland is a micro business economy and the experiences of these businesses mirror those of many consumers. Within Section 5.14 of the Ofcom Call for Input, it is stated:

- SMEs are less reliant on letters, with nearly half (47%) reporting that they have moved some communications from letters to other communication methods within the past year.

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<sup>23</sup> [Consumer survey research on post \(ofcom.org.uk\)](https://www.ofcom.gov.uk/consult/condocs/consumerresearch/consumerresearchonpost/consumerresearchonpost.pdf)

<sup>24</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

- However, some SMEs still contact some of their customers by letter, particularly those who are not online.
- Letters are used for direct marketing and invoices, contracts, and reminders for items that require a signature on receipt.

Given the unique micro-business economy in Northern Ireland we would encourage Ofcom to consider impacts on the micro business population when it comes to changes to the USO.

As previously mentioned, Northern Ireland holds a unique position in the UK. The geographic and demographic differences of Northern Ireland consumers compared to their GB counterparts, outlines the importance of parity and protection of the postal service for consumers in this part of the UK.

We would also encourage Ofcom to consider Northern Ireland's unique location and consumer context, and subsequently the unique experiences of Northern Ireland consumers resulting from changes to the USO.

**This position supports our guiding consumer protection principles of access, choice, fairness and representation.**

**Question 3: Do you agree with our assessment of the bulk mail market? Are there other factors relevant to its future evolution which we have not considered?**

The Consumer Council would like to highlight the importance of the bulk mail market to Northern Ireland consumers, and especially those who are in vulnerable circumstances. The bulk mail letters service is essential, especially those letters sent by the following:

- Government and public services
- His Majesty's Revenue and Customs (HMRC)
- The Department for Work and Pensions (DWP)
- Local councils
- The courts
- The NHS

In the Ofcom Call for Input, it states how the requirements of the USO largely align with how Royal Mail manages and delivers bulk mail and any changes to the USO would have an impact on how bulk mail is delivered.

We would like to understand what, if any, specific research Ofcom has conducted to assess the impact of changes to the bulk mail market as a result of USO changes, and how this may impact upon consumers engagement with the public services listed above.

Our 2023 research<sup>25</sup> found the perception of Northern Ireland consumers on the current reliability of postal services and the impact this had on them:

- A significant proportion of participants noted a decline in reliability since the onset of the COVID-19 pandemic.

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<sup>25</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)



- The negative impact of reduced reliability had on hospital appointments was highlighted by participants.

The research also highlighted the practical impacts that a future reduction in the frequency of letter deliveries may have on them with examples presented including:

- Those who received a significant number of letters for medical appointments were concerned that a reduction in letter delivery and collection could lead to a delay in receiving appointment notifications and could cause appointments to be missed.
- Having less time to plan the logistics of appointments would make attendance more difficult and stressful.
- Missing appointments could also lead to patient discharges despite still requiring medical help.
- There was concern that a reduction in the frequency of delivery and collection of letters may result in bills not being paid on time and banking not being managed effectively.
- These individuals also tended to be less technologically savvy and were unlikely to have ticked the 'paperless' options offered to them by utility companies and banks.

It was clear these individuals rely on the postal service for important documents. It is important that any changes to the USO, particularly regarding frequency and speed, considers the impact on consumers and thought is given is given on how to mitigate these impacts.

**This position supports our guiding consumer protection principles of access, choice, fairness and representation.**

**Question 4: Are there specific events/changes that could trigger a significant change in demand for large mail users, including public services?**

There may be several events/changes that could trigger a significant change in demand for large mail users, including public services.

We have not conducted specific research to assess potential significant changes in demand for large mail users, however other research we have commissioned highlights some potential considerations for consumers.

Section 6.13 of the Ofcom Call for Input states:

- The volume of bulk mail is in decline.
- Much of this is due to an increase in e-substitution.

However, Section 6.18 of the Ofcom Call for Input states that there remain consumers:

- Who do not have access to the internet and those that are not interested in being online.
- Or who may lack the digital skills and/or confidence to navigate the internet confidently and safely.

In our 2023 research<sup>26</sup>, we found older participants were nervous about being forced to adopt online paperless alternatives to letters with the following examples given highlighting how they were:

- Worried about missing bill payments.
- Not being able to keep on top of their banking.
- Missing medical appointments as a result of not being able to get to grips with such systems.
- They were not confident in their ability to access letters online, with some not having any access at all.

The Consumer Council also commissioned research titled 'Impact of scams on Northern Ireland consumers' in 2022<sup>27</sup>. Key findings from this research include how:

- Consumers are most worried about being scammed online.
- Of those who have been targeted by a scam the net figure for online is 77% (email being the highest).
- The research findings presented highlight concerns of consumers in transitioning from letters to e-substitutes and concerns regarding being scammed online.

We would encourage Ofcom and Royal Mail to proactively horizon scan and monitor external and environmental triggers that could result in a significant change in demand.

**This position supports our guiding consumer protection principles of access, choice, safety, fairness and representation.**

**Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?**

**Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?**

**Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?**

Our response addresses these three questions together.

We understand the restrictions the USO has on Royal Mail's freedom to operate commercially. We welcome Ofcom's decision to review of the USO and how this can evolve to meet changing consumer needs.

While we understand the need for financial sustainability, we would encourage Ofcom to consider how changes to the USO impacts on consumers that rely on post the most.

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<sup>26</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

<sup>27</sup> [Impact of scams on Northern Ireland consumers | Consumer Council](#)

Again, our 2023 research<sup>28</sup> found:

- Consumers perceived potential changes to the USO as being focused on cost saving rather than meeting consumer needs.
- The cost-of-living crisis was a common concern.
- There was concern that Royal Mail prices had increased significantly, in particular the cost of stamps.
- There was a sense of frustration at the idea of prices increasing and delivery frequency decreasing.

As households faced sustained cost of living pressures, Royal Mail increased the price of stamps for its USO products. In April 2022, a first class stamp cost 95p and a second class stamp cost 68p. As of April 2024, a first class stamp costs £1.35 and a second class stamp costs 85p.

The Consumer Council regularly conducts research to understand the household income and expenditure of consumers in Northern Ireland, with comparatives to the UK average.

Our latest Northern Ireland Household Expenditure Tracker, covering July to September 2023, found:

- 50% of Northern Ireland households have less than £90 per week after taxes and essential spending.
- Our lowest earners, Quartile 1, have an average gross household income of £14,087.66.
  - Their income after tax is 7.3% lower (£257.84) compared to the UK (£278.02).
  - They have less than £32 per week after paying taxes and paying for essentials.
  - They spend 53% of their total basic spending on food, rent, utilities and transport.
  - Their discretionary income has halved since our first report in Q1 2021 (£64.02).

We also conduct quarterly Consumer Pulse surveys with a demographically representative sample of 1,000 consumers. Our latest report, published in December 2023<sup>29</sup>, found:

- Over half (53%) felt their household was worse off compared to 12 months' ago.
- Over a quarter (36%) felt their household would be worse off in 12 months' time.
- 19% said they had £50 or less each month after paying for housing and essential bills.
- 36% said they had £150 or less each month after paying for housing and essential bills.
- 37% said their mental health had been negatively affected by their financial situation.
- Three quarters (75%) agreed they try to stick to a budget.
- However, nearly half (48%) found dealing with financial matters a burden.
- 59% said they had to cut back on essentials after paying rent/mortgage/overdraft/loans.

We would encourage Ofcom to consider the financial implications on consumers in any changes to the USO and ensure appropriate safeguards remain in place, particularly to protect consumers in the most vulnerable circumstances.

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<sup>28</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

<sup>29</sup> [Consumer Pulse Survey Q3 2023 | Consumer Council](#)

**This position supports our guiding consumer protection principles of access, choice, safety, fairness and representation.**

**Question 8: Do you agree with our analysis of the different options available to change the USO and the impact of those changes on residential (including vulnerable) users, SMEs and bulk mail users? If not, please explain why and set out any option(s) which we have not considered.**

While we understand the analysis Ofcom has presented on the different options for changing the USO, we believe the evidence presented does not go far enough to identify the practical impacts of potential changes on consumers, SMEs and bulk mail providers.

The options set out in the Call for Input are:

- Making changes to the existing First and Second Class and business products so most letters are delivered through a slower service taking up to three days or longer, with a next-day service still available for any urgent letters; and
- Reducing the number of delivery days offered from the existing six-day-a-week obligation down to five or three days.

Ofcom could implement option one with its regulatory powers, meaning longer delivery time for letters. Option two would need parliamentary approval before any change is made.

Throughout this response we have provided evidence of consumer feedback collated from our research to highlight concerns they have raised with the current provision of the USO, and impacts from potential future changes.

We would encourage Ofcom to undertake further research to clearly identify how potential changes to the USO will impact consumers, SME's and bulk mail users, and how these impacts can be mitigated.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

**Question 9: Which option(s) do you consider would be most appropriate to address the challenges we have identified, while also ensuring that users' needs are adequately met?**

The Consumer Council has not selected either of the options presented.

As the representative consumer body in Northern Ireland, our aim is to ensure the voice of consumers is heard, and we have highlighted this throughout our response using key research that presents their experiences, expectations, and concerns. The Consumer Council's 2020 research<sup>30</sup> gathered an understanding of the importance of the universal postal service to consumers in Northern Ireland, and found:

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<sup>30</sup> [The Universal Postal Service and Northern Ireland Consumers | Consumer Council](#)

- Outside of the safeguards provided by the universal postal service in the unregulated parcel market, Northern Ireland consumers are susceptible to detriment in terms of higher prices and lack of choice.
- In Northern Ireland, the universal postal service is of significant importance to consumers in vulnerable circumstances.

Before Ofcom decides on which option is most appropriate to evolve the USO to meet changing consumer needs, it is important that consumers are engaged and involved in the co-design of the most appropriate solution to meet their needs.

The USO must be a solution to ensure that social needs, which would not be covered by market forces, are provided for those who need it. We look forward to working with Ofcom and Royal Mail to achieve this outcome.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

**Question 10: Do you have any other views about how the USO should evolve to meet users' needs?**

As previously mentioned in this response, the Consumer Council use eight guiding principles to assess where the consumer interest lies, and to develop and communicate our policies, interventions and support.

**Figure 2: Consumer protection principles**



They provide an agreed framework through which we approach regulatory and policy work and ensure we apply a consistent approach across statutory and non-statutory functions, and in our engagement with consumers and stakeholders.

They serve to protect consumers, setting out the minimum standards expected from markets when delivering products or services in Northern Ireland.

They frame our policy position and approach to addressing emerging detriment and resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular amongst vulnerable groups.

It is through this lens that we would encourage Ofcom to test the feasibility of the options presented in the Call for Input, so all consumer groups, including those in vulnerable circumstances, are protected and have access to a reliable, affordable, accessible, and universal postal service.

The Ofcom Call for Input focuses on changes to the USO to meet changing user needs on the basis of ensuring greater financial sustainability for Royal Mail. The Consumer Council would encourage Ofcom to:

- Place the consumer and their needs at the heart of any future reform.
- Evolve the USO to support the needs of all consumers, including vulnerable groups, and proactively mitigate against emerging risks.

**Important for the principles of the USO to align with our principles of access, choice, safety, information, fairness, representation, redress and education.**

### Consumer Protections

One consideration in potential changes to the USO could be how consumer protections can be strengthened.

Sector regulators across multiple markets have re-considered their approach to consumer protection in recent years, with the Financial Conduct Authority (FCA) launching its Consumer Duty<sup>31</sup> in July 2023. We would encourage Ofcom to consider how the current consumer protections within the USO could be enhanced.

Another consideration could be a requirement for the designated universal service provider, who at this time is Royal Mail, to obtain and retain the ISO 22458:2022 for Consumer Vulnerability<sup>32</sup> with British Standard Institution (BSI) Kitemark for Inclusive Service<sup>33</sup>.

In the financial year ending March 2022, Royal Mail delivered just below eight billion letters without including election letters with parcel deliveries reaching 1.5 billion packages<sup>34</sup>. The introduction of independent best practice accreditations will:

- Strengthen accountability and transparency, raise standards of service and enhance consumer protections.

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<sup>31</sup> [Consumer Duty | FCA](#)

<sup>32</sup> [ISO 22458:2022 - Consumer vulnerability — Requirements and guidelines for the design and delivery of inclusive service](#)

<sup>33</sup> [Committed to supporting vulnerable customers | BSI \(bsigroup.com\)](#)

<sup>34</sup> [Volume of letters and parcels delivered through the UKPIL \(UK parcels, international & letters\) segment of the Royal Mail Group from financial year 2017 to 2022](#)

- Provide the government, stakeholders and the citizens Royal Mail are there to serve, with the assurance and commitment that a future USO will be fair, flexible and inclusive.

The Consumer Council was the first organisation in Northern Ireland to achieve the BSI for Inclusive Service Provision, and is now one of two organisations to hold ISO 22458:2022 for Consumer Vulnerability with the BSI Kitemark for Inclusive Service.

We also have extensive statutory responsibilities in energy, water and sewerage and transport, drawn from legislation, licences given to companies working in Northern Ireland, and cooperation agreements set in memorandums of understanding.

Our work with regulated companies in these sectors includes conducting independent audits complaints handling and standards of service, carrying out reviews regulatory policies and developing evaluative performance frameworks with Northern Ireland's Department for Infrastructure and Utility Regulator.

We would be happy to brief Ofcom and Royal Mail on our extensive experience of improving standards and consumer protections in the energy, water and sewerage and transport sectors, and advise how this work can be carried across and embedded in postal services.

A further consideration, which relates to the quality of service, is the inclusion of a compensatory scheme across USO products. A compensation scheme could enhance the incentivisation for Royal Mail to meet quality of service standards and subsequently improve consumers experiences of postal services.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

### Cost

As previously outlined, the Consumer Council's 2023 research<sup>35</sup> found concerns and frustration amongst consumers related to postal services:

- The cost-of-living crisis was a common concern.
- There was concern that Royal Mail prices had increased significantly, in particular the cost of stamps.
- There was a sense of frustration at the idea of prices increasing, but the frequency of delivery and collection decreasing.
- Despite the current price cap on second class letters and small parcels, some of those who depended heavily on the services provided by Royal Mail were worried that if prices continued to increase, they would not be able to afford to use the services.
- The rising cost of stamps was preventing some participants from using the universal postal service.
- Some older participants were prevented from sending as many Christmas cards as they once had, in some cases they only sent cards to people who they did not see regularly.

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<sup>35</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

Below is a direct quote from a participant in the research:

***“I can’t bring myself to post cards. It’s just too expensive.”***

Empty nester, 65+, DE, Derry City and Strabane

Some participants noted it costs more to send a card than it does to buy one and they could not justify the expenditure amidst the cost-of-living crisis. Some of these individuals resorted to delivering cards by hand to those who lived locally.

Keeping price protection in the form of safeguard caps is important to meet the needs of the most vulnerable consumer groups.

As previously mentioned, on a UK level, digital exclusion remains an issue with around one in twenty households having no access to the internet<sup>36</sup> with Northern Ireland continuing to have the highest proportion of internet non-users in the UK, at 14.2%.

Royal Mail currently charge less for certain products online compared to when purchased in-person. For example, to purchase postage for a large letter weighing between 101 grams and 250 grams it currently costs £1.90 online compared to £2.10 in-person<sup>37</sup>.

It is on this basis that we encourage Ofcom to ensure:

- Consumers are treated equally whether they engage with postal service products online or in-person, including those who are digitally excluded.
- An evolution of the USO must include the requirement for equal pricing of products, both online and in-person, in order to mitigate the risk of the digital divide.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

#### Access to post for vulnerable consumers

Section 9.92 of the Ofcom Call for Input states:

*“The consumer advocacy bodies have also identified other areas of potential consumer concerns such as support for people during periods when they do not have safe access to a fixed address (e.g. due to homelessness or because they are a victim of domestic abuse).”*

All consumer groups must have access to post. We have been working with Consumer Scotland and Citizens Advice England and Wales, exploring options to ensure the USO is truly universal across the UK and for all consumers.

Section 2.4 of the Ofcom Call for Input states:

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<sup>36</sup> Ofcom, Review of Second-Class safeguard caps 2024: Proposed price caps for Second Class universal services, 2023

<sup>37</sup> [Prices 2024 | Royal Mail Group Ltd](#)



*“The designated universal service provider conditions set out in greater detail the products and services that must be provided as part of the universal postal service”.*

One of these services that must be provided is post restante, a free service allowing users to have mail delivered to a post office, from where they can collect it for a fixed period of time.

An Post, the designated postal universal service provider for the Republic of Ireland has launched its Address Point Service<sup>38</sup> to meet the needs of these vulnerable consumer groups, and operates a model similar to what the Consumer Council is proposing.

We urge Ofcom to consider the evolution of the post restante service within any future USO to meet the needs of consumers in vulnerable circumstances during periods when they do not have safe access to a fixed address (e.g. due to homelessness or because they are a victim of domestic abuse).

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

### Track and trace

We note Ofcom declined a request from Royal Mail in 2017 to include track and trace on their standard USO products.

Research commissioned by the Consumer Council in 2020 titled: ‘The universal postal service and Northern Ireland consumers’<sup>39</sup> included a recommendation for Ofcom to include track and trace services across all USO products. We note that International Distributions Services plc have announced that Royal Mail have submitted their response to the Ofcom Call for Input and included in the response Royal Mail have called for Ofcom to introduce the new feature of “Tracking added Universal Service parcels to reflect customer demand”<sup>40</sup>.

Given the continued growth in the parcel market, scams are becoming more sophisticated. Our 2022 research into the impact of scams on Northern Ireland<sup>41</sup> found that:

- Parcel delivery scams were the most common for those who have been scammed.
- With 59% of those who have experienced a scam saying they were targeted by a parcel delivery scam.

Emerging from the COVID-19 pandemic and the increase in the parcel market research and reports suggest that porch piracy, the practice of parcels being left at consumers doors or designated safe places being stolen, is becoming more prevalent. Research carried out by Quadient<sup>42</sup> highlighted:

- There has been a 57% increase in parcel theft in the last year.
- With 11% of UK households reporting a parcel theft in the last year.

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<sup>38</sup> [Address Point \(anpost.com\)](https://www.anpost.com)

<sup>39</sup> [The Universal Postal Service and Northern Ireland Consumers | Consumer Council](#)

<sup>40</sup> [Royal Mail presents proposal for the future universal service and calls for urgent action](#), International Distributions Services, April 2024

<sup>41</sup> [Impact of scams on Northern Ireland consumers | Consumer Council](#)

<sup>42</sup> [UK's plague of 'porch pirates' getting worse, with more than £200 million-worth of parcels stolen in the last year | Quadient](#)

As previously mentioned, research conducted by the Consumer Council in 2024<sup>43</sup> on parcel delivery services found that:

- 63% of consumers stated that a parcel was left at an insecure location around their property in full view of others.

We would encourage Ofcom to revisit its decision to not include track and trace on standard USO products and consider this as a potential addition to any future USO in order to meet changing consumer needs and purchasing behaviours.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

#### Quality of service

The Consumer Council commissioned research titled 'Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation'<sup>44</sup> in 2023 which highlighted how Royal Mail missing the quality of service targets has impacted consumers in Northern Ireland. Examples include:

- Many participants had noted a decline in reliability regarding the length of time it took for letters to be delivered.
- They tended to use first class services, despite them being more expensive than second class (there was a strong perception that first class no longer meant delivery the following day as it had in the past).
- With many feeling that first class was more likely to be delivered within the timeframe of what second class used to be (2-3 days), if not longer.
- There was a sense that trying to get a letter delivered within a working week was a risk with second class.

We would encourage Ofcom to review the quality of service conditions and ensure these meet the needs of consumers, and our recommendations under 'Consumer Protections' in this section.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

#### International changes to USO

Section 7 of the Ofcom Call for Input presents how other countries have already adapted, or are in the process of adapting, their USO specifications in response to changing user needs.

Given the changes that have already occurred to universal postal services elsewhere in the world, we would encourage Ofcom to use this as an opportunity to conduct research to gather key learnings and best practice from these countries.

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<sup>43</sup> The Consumer Council Parcel Delivery Services February 2024 (not yet published)

<sup>44</sup> Qualitative Study on the Impact on Consumers of Changes to Royal Mail's Universal Service Obligation November 2023 (not yet published)

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

### Role and impact of changes on the Post Office network

The Consumer Council would like to better understand the potential impact of any changes to the USO on the Post Office network.

As previously outlined, our research into consumer access to the Post Office network<sup>45</sup> looked at the opportunities and challenges facing consumers.

The Post Office network provides consumers across the UK with vital access to a range of highly valued essential services. These include:

- Access to the postal service.
- Access to basic and personal banking facilities.
- Access to various government services.

From this research we found:

- Rural post offices make up most of the network in Northern Ireland.
- Nearly two thirds (65%) of the network consists of rural branches which is significantly greater compared with the proportion of the rural UK network (54%).

Additionally, our research shows the importance of post offices to those living in rural areas to provide access to postal services. For instance:

- 81% of rural consumers say access to a post office is important when deciding to use Royal Mail.
- 77% of rural consumers said they used a post office to send letters and buy stamps.
- 75% of rural consumers said they used a post office to send parcels.

The Consumer Council's 2023 research found:

- Consumers appreciated the convenience of being able to drop packages at a Post Office and know they would be collected promptly.
- Many of those working full-time acknowledged the convenience of some Post Office locations and the opening hours, which enabled them to use the service after work and on a Saturday.
- Consumers appreciated the convenience of being able to drop packages at a Post Office and know they would be collected promptly, although many have noted a decline in reliability regarding the length of time it takes for letters and packages to be delivered.

We acknowledge Ofcom does not regulate Post Office Ltd but would encourage Ofcom to consider how the proposed options for USO reform may impact on the post office network

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<sup>45</sup> [Consumer Access to Postal Services at the Post Office Network in Northern Ireland | Consumer Council](#)

and how this then may impact on consumers, particularly those most reliant on the post office to access postal services.

**This position supports our guiding consumer protection principles of access, choice, safety, information, fairness, representation, redress and education.**

## 5. Conclusion

The Consumer Council supports the need for a more sustainable model for the USO, and welcomes Ofcom's Call for Input as the start of this conversation.

However, we believe the consumers and their needs must be placed at the heart of this reform and given equal priority to the financial sustainability of Royal Mail and its operation, with any evolution of the USO held to the highest standards of consumer protection.

Throughout our response, we have provided a robust evidence base of consumer research, and highlighted the unique considerations for Northern Ireland and challenges for our citizens and consumers, when compared to England, Scotland and Wales. We have also highlighted how the evolution of the USO presents Ofcom and Royal Mail with an opportunity to enhance the service it offers to consumers.

We understand Ofcom intends to publish its findings from the Call for Input later in 2024, when it will also set out the next steps. We look forward to continuing the discussion with Ofcom, Royal Mail and partners, including consumer representative organisations, to represent the needs of Northern Ireland consumers.

## 6. Contact information

If you have any questions, require further information or wish to discuss any aspect of our response, please contact:

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