

Your response

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<p>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?</p>	<p>Confidential? –N</p> <p>Whilst Germinal GB agree that social cohesion, economic growth and citizen-state interactions are key roles of the USO we believe a more critical role (incorporated into economic growth parameters) is to enable next day, traceable transport of perishable business items where delivery is time critical both to the growth of the business and functioning of the product.</p> <p>We agree that the fundamental principles of universality, affordability and uniform pricing should continue to be maintained as far as reasonably practicable.</p> <p>We believe that the accessibility, reliability, timeliness and security of the USO service are vital core features that should be prioritised above the fundamental principles.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>Whilst we agree that reliability of letters is becoming of increasing importance in comparison to speed of delivery we believe that the assessment fails to acknowledge the importance of delivery frequency to enable the transportation of perishable items. Germinal GB is a seed merchant which relies heavily on the Royal Mail postal service to transport post harvest seed samples to the laboratory for germination testing. Extended periods in transit (particularly during warmer months) compromise the standard of the sample and can lead to incorrectly failing laboratory testing. This potentially compromises the livelihoods of our farmers who will have seed rejected incorrectly due to degradation in transport. For many SMEs that deal in similar goods therefore it is vital that next day delivery services remain a priority within the aims of the postal service – particularly when considering limited rural access to alternative delivery providers. We therefore agree with the conclusion that it is vital ‘special delivery’ services remain.</p> <p>As a business we increasingly utilise email for the majority of communications as the report suggests is the gen-</p>

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	<p>eral trend for SMEs. This means that any postal documents sent are often of very high importance and security and reliability of delivery is paramount.</p> <p>Ultimately, whilst Germinal GB do more commonly utilise alternative providers for parcel deliveries the deliveries that are sent via Royal Mail are often of upmost importance for internal functioning of the enterprise.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>Yes. It is not a process of the service that Germinal GB engages with commonly. We foresee increased e-substitution in this market. We do however, acknowledge that remaining bulk letters are of high importance and therefore security and reliability of delivery is paramount.</p>
<p>Question 4: Are there specific events/changes that could trigger a significant change in demand for large mail users, including public services?</p>	<p>Confidential? – N</p> <p>Implementing specific unified governmental mailbox systems are likely to rapidly reduce demand for bulk mail services.</p> <p>Further change to GDPR rules could lead to rapid variations in preferred contact method.</p>
<p>Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?</p>	<p>Confidential? – N</p> <p>Yes. However, it is important that latterly intangible benefits are presented for stakeholder opinion in addition to currently presented data.</p>
<p>Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?</p>	<p>Confidential? – N</p> <p>Yes.</p>
<p>Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?</p>	<p>Confidential? – N</p> <p>Yes. However, transparency of USO internal financial is key to ensure efficient budgeting and management.</p>

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<p>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.</p>	<p>Confidential? – N</p> <p>We agree that there should be no proposed change to the parcel delivery system as efficiency of parcel delivery is of high importance to both residential and SME users.</p> <p>As highlighted in the report it is important that resultant changes do not unfairly impact rural locations. Any proposed change to number of delivery days should be universally applied regardless of geographical location. In the case of Germinal GB seed certification timing requirements are applied unilaterally across the country and a geographically varied approach would unfairly impact rural and isolated communities.</p> <p>We agree that it is vital the special delivery services are maintained.</p> <p>Taking an extreme approach and reducing delivery days to 1 day per week would not be beneficial to the UK demand without evidence of more rapid demand decline. 3 days per week delivery slots would be acceptable for most post however it must be made clear whether the 5 day delivery targets reflect 5 working days or not as an increase above the 5 day target is not acceptable within business communications and it should not be essential to pay for one day delivery to ensure communications are received within 1 week.</p> <p>Germinal GB are generally closed on a Saturday so there would be no likely impact from the cease of Saturday delivery however Saturday collections should remain available.</p> <p>Specific reforms to remove the ‘first class’ delivery time period should consider pricing of next day delivery alternatives to ensure that post of a higher importance is still affordable to access.</p> <p>Access to requests to deliver all bulk post on the same day should be affordable to SMEs where confidential information must often be received by recipients within a timely manner of each other.</p> <p>Although review of emissions reduction from less delivery days is important to achieve net zero this should only be reviewed in association with the social impact of job losses.</p>

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	<p>E-letter upload options for paper delivery should be continually monitored with potential major benefits for commercial utilisation but confidentiality of contents should be considered.</p> <p>Although it is understood that a reduction in delivery days may be necessary it is not justifiable to reduce the current QoS parameters. Reliability and security of postage items remains vital to secure operation of SMEs and should not be compromised as part of a cost saving exercise.</p> <p>We support a higher QoS standard for on time delivery but acknowledge that there will be extenuating circumstances where delivery within the timeframe can be guaranteed. We would support a 95% target.</p> <p>Germinal GB are in support of any subsidies to help negate additional costs of requirement for same day delivery of time critical universal deliveries.</p> <p>Rural services such as ‘hand collection’ from a postal officer and ‘Parcel collect’ fee paid services should remain supported by the USO.</p> <p>Transparency during transfer will be vital to ensure SMEs are made aware of changes in service well in advance of implementation. This will allow companies such as Germinal GB to work on procedures to accommodate adjustments in advance.</p> <p>Special consideration should be given to the impact of bank holidays on reduced delivery schedules ensuring that areas are not unfairly impacted by cease of delivery on bank holidays.</p>
<p>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?</p>	<p>Confidential? – N</p> <p>Most appropriate:</p> <ul style="list-style-type: none"> • Removal of the ‘first class’ option so long as ‘next day’ special deliveries are affordable • Removal of Saturday delivery so long as Saturday collections remain • No change or higher QoS standards applied • E-letter upload options for bulk letter deliveries so long as security and confidentiality is maintained

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	<ul style="list-style-type: none"> Subsidisation to help negate additional costs of premium services that would offer all bulk letters to be delivered on the same day
<p>Question 10: Do you have any other views about how the USO should evolve to meet users' needs?</p>	<p>Confidential? – N</p> <p>Better access to 'on the road' online labelling services to reduce time taken in post office services.</p> <p>Optional 'preferred' delivery day options for SMEs if service days are reduced</p>

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