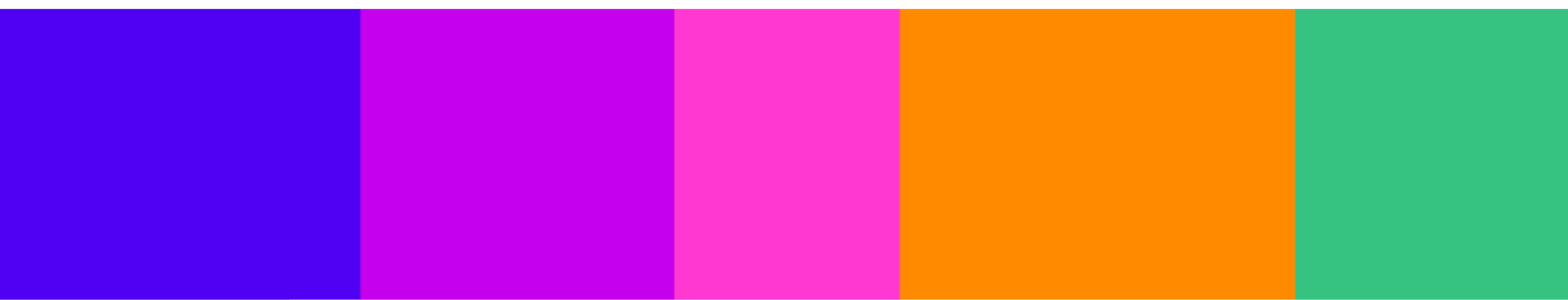


## Your response

Question	Your response
<p><b>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?</b></p>	<p>My Labour frontbench colleagues will be responding on the wider issues concerning the USO.</p> <p>My response to this consultation, on behalf of my constituents, is focused on two issues: accountability and reporting of performance data, and the need for proper consultation on any proposed closure of the delivery office.</p>
<p><b>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?</b></p>	<p>I would like to highlight that the consultation document does not address the reliability of postal delivery services, either under the current USO or under a revised obligation. My constituents have experienced poor and unreliable Royal Mail services for many years. Neither the USO nor the Ofcom accountability framework have been effective in ensuring a reliable service. An effective accountability framework is as important as a statutory obligation in guaranteeing the reliability of Royal Mail services for those who rely on them.</p>
<p><b>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?</b></p>	
<p><b>Question 4: Are there specific events/changes that could trigger a significant change in demand for large mail users, including public services?</b></p>	
<p><b>Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?</b></p>	



Question	Your response
<p><b>Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?</b></p>	
<p><b>Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?</b></p>	
<p><b>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.</b></p>	<p>As mentioned above, the accountability framework for Royal Mail is of vital importance, and there is not currently a functioning accountability framework which can remedy poor performance. My constituents have found it to be particularly problematic that there is currently no requirement on Royal Mail to publish data at the level of individual postcode areas, such as, for example, SE24. The data is only published at sub-regional level, for example SE. This means that poor performance at the SE24 or SE21 delivery areas can be masked by acceptable performance in other areas of the sub-regional area. In several postcode areas in Dulwich and West Norwood, my constituents have experienced the failure of Royal Mail to comply with the USO, sometimes for weeks or months at a time. We have found that there is effectively no consequence for Royal Mail from doing this, and no remedy that Ofcom is able to deliver. It is vital that under any new arrangements arising from this review, there is a data reporting requirement on Royal Mail at the level of individual postcode areas, for example, SE24, not only the sub-regional postcode area, for example SE.</p> <p>Alongside better reporting requirements, it is also important that there is an effective sanctions regime for Royal Mail which is responsive enough to deliver a change in performance when there are failures. For example, if Royal Mail fails to meet its statutory obligations in SE24 over a period of six months, it should face a financial penalty which is proportionate and sufficient to provide an incentive to deliver meaningful improvements.</p>

Question	Your response
<p><b>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?</b></p>	
<p><b>Question 10: Do you have any other views about how the USO should evolve to meet users' needs?</b></p>	<p>I would like to raise the need for proper consultation with local residents to take place before any decision is made on the potential closure of a delivery office. This is based on the experience of my constituents in the SE22 postcode area, following the closure of the SE22 delivery office in 2018.</p> <p>This closure took place without any consultation with customers in SE22, because there is currently no requirement to consult. My constituents raised many concerns, including that the SE15 delivery office, into which SE22 was to be merged, was inaccessible and too small to accommodate the volume of work; that the further reaches of SE22 were too far from the SE15 office to enable postal workers to complete their rounds within a reasonable timescale. All of these concerns proved well founded, and services in SE22 have rarely been completely reliable ever since. Any new regulatory framework for Royal Mail should include a requirement to consult members of the public as part of the decision making process on any proposed closure of a delivery office, and to take account of the views that are expressed during that consultation in making the final decision.</p>

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