



Consultation response form

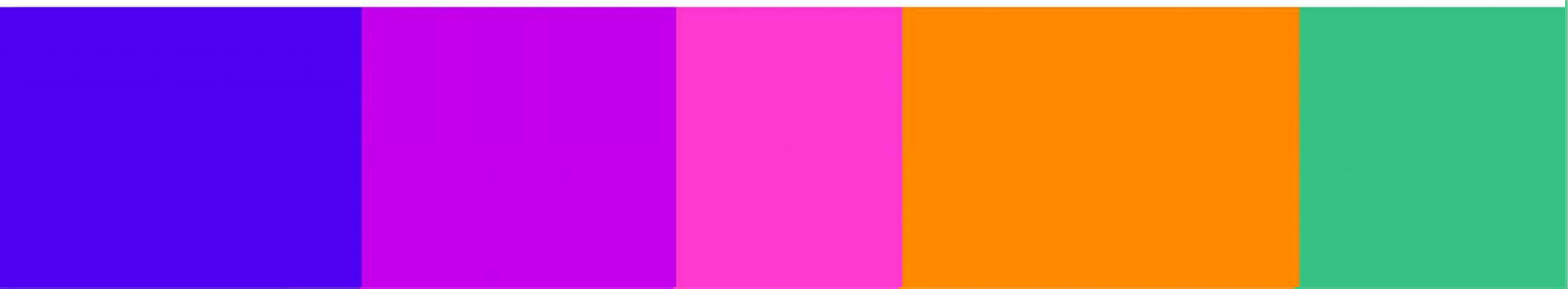
Please complete this form in full and return to futurepostalUSO@ofcom.org.uk

Consultation title	The future of the universal postal service
Full name	[REDACTED]
Contact phone number	[REDACTED]
Representing (delete as appropriate)	Self
Organisation name	
Email address	[REDACTED]

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.	Nothing
Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.	None
For confidential responses, can Ofcom publish a reference to the contents of your response?	



Your response

Question	Your response
<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? – No</p> <p>Figure 3.2 only covers part of the time period in Figure 3.1 and it includes international mail, which is excluded from Figure 3.1. These differences do not allow readers to form a proper picture of market developments.</p> <p>The reference to Denmark in 3.14 is irrelevant because the UK has not similarly mandated the use of digital services.</p> <p>The points about USO services in 3.17 and 3.18 are seriously misleading. It lies within Ofcom’s powers to determine which of Royal Mail’s services should be provided within the universal service and it is wholly possible for Ofcom to specify that 100% of the services provided by the Reported Business are USO services. The declining proportion of USO services only indicates that Ofcom has only specified that a proportion of Royal Mail’s services should be USO services. This is a fundamental issue because all services carried by the universal service network contribute to its sustainability.</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? – No</p> <p>You highlight anecdotal comments from survey respondents in order to support your argument for a reduction in the USO.</p> <p>You shouldn’t be relying on market research interviews to determine what people are sending in the mail: instead, you should be using methods that actually determine the content of the mail. Royal Mail used to commission a Mail Content Survey that was an important input for its econometric modelling.</p> <p>You point out that people are increasingly using Second Class instead of First Class but fail to indicate that a reason for this is likely to be the increase in price of the First Class service. (Although you do cite cost as a reason for e-substitution.)</p> <p>You really must provide considerably more information about user needs, most specifically the needs of vulnerable users.</p> <p>A substantial omission from your analysis are the needs of the blind and partially sighted, who currently benefit from a free First Class service, and who might reasonably be expected to be directly affected from changes in the specification of the USO.</p>

Question	Your response
<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? – No</p> <p>In view of the importance of bulk mail to the sustainability of the universal service it is a substantial weakness of the current regulatory regime that bulk mail is not a USO service. There is no inconsistency between Royal Mail being obliged to collect and deliver mail and competition in parts of the value chain. Royal Mail already offered discounted prices for pre-sorted bulk mail many years before the postal market was liberalised. In essence, Royal Mail outsourced part of its sortation process to mail houses and printers who were able to do the sortation more efficiently. Downstream access was a feature of mail markets in other countries such as the USA and provided lower prices to businesses that were able to both pre-sort mail and transport it to mail centres across the country, thereby reducing the need for the postal operator to incur some transportation costs as well. Neither presortation nor downstream access dilutes the need for Royal Mail to provide the final delivery of bulk mail and a collection network for single piece mail. The extension of the USO to bulk mail and certain other products carried on the universal service network would reduce the misleading impression in 3.17 and 3.18 about the declining proportion of USO mail. If all the mail was USO mail then the proportion couldn't fall. Additionally, the extension of the USO to these products would stop Royal Mail's specious claims that only the USO products should carry the cost of the USO network. If all the mail was USO mail then it would all have to carry the cost of the USO network.</p> <p>Stronger regulation of the bulk mail market is necessary because it does not operate in the normal commercial manner implied by 6.9. Royal Mail effectively has a monopoly on the delivery of bulk mail and access operators are not really able to negotiate commercial agreements. Bulk mailers occupy a stronger commercial position because they are able to choose between access operators and Royal Mail's end-to-end services but in many respects there is little product differentiation and little variation in terms and conditions because the key features are determined by the nature of Royal Mail's access products.</p> <p>Ofcom states (6.14) that competition in the bulk mail market remains strong. It would be more accurate to say that competition in the upstream part of the mail market is strong. Ofcom failed to prevent Royal Mail excluding competition in the delivery part of the value chain, making observers sceptical about the regulator's interests, motivations and abilities.</p> <p>The observations in 6.21 about government-led digital transition initiatives in Denmark, Norway and Belgium are not really relevant to the discussion of the USO in the UK, a country that has not implemented such initiatives. Yes, such an initiative is possible, although currently extremely unlikely, and Ofcom needs to have considerably more certainty about the</p>

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	<p>likelihood and extent of such an initiative before considering it as a major factor in the development of its mail forecasts and assessment of risks for the universal service.</p> <p>Ofcom's Call for Inputs proceeds in Section 7 to discuss international experience but this response form does not provide a field to comment on this information. I shall therefore address issues arising from Section 7 here.</p> <p>The trend line in Figure 7.1 is nonsensical. Denmark is clearly an outlier and its omission from the chart would result in a dataset with no clearly discernible trend.</p> <p>In contrast, the omission of Belgium, Sweden and Denmark (countries with high levels of e-substitution) from Figure 7.2 would result in a dataset that implies that countries with high per capita domestic mail volumes have high delivery frequencies.</p> <p>Several of Ofcom's observations about measures taken in other countries appear to fall short of providing a fully information picture of the state of the postal markets in those countries. For instance, regarding the removal of priority letters from the USO (7.9) and changes in the required speed of delivery for USO letter products (7.11) it is necessary to describe what has happened since these changes. It is possible for a product to be outside the USO but for an operator to continue to provide it across a widespread area voluntarily. Similarly, decreasing the specified speed of delivery might affect a proportion of mail whilst most of it continues to be delivered more quickly. A further example are changes in the delivery frequency. Ofcom clearly implies in 7.13 that mail in Denmark is only delivered on one day a week. And yet Copenhagen Economics (<i>A New Stage for Postal Sector Regulation?</i> 25 September 2023) states that "services currently covered under the USO are expected to be provided by the market at the desired quality without any regulatory intervention". Copenhagen Economics also says that "a few targeted measures will still be applied where and when needed. This includes the safeguarding of postal services to island communities, free shipments for the blind, and international mail". This is a very different depiction of postal services in Denmark to the one presented by Ofcom. One must wonder where else Ofcom has misrepresented the reality of postal markets in other countries and what reasons Ofcom has for doing so. (I can see that Ofcom provides a fuller depiction of the situation in Denmark in 7.27ff but this does not mitigate the misleading impression given in earlier paragraphs.)</p> <p>There is a difference between what USPs are obliged to do and what they do in practice. USOs should be regarded as baseline services that ensure minimum standards across a postal territory. The expectation is that USPs provide services that actually exceed these minimum standards.</p>

Question	Your response
	<p>The description of alternate day delivery (ADD) of non-priority mail in Belgium also appears to be misleading. The change to ADD of non-priority mail does not seem to be a change to the USO. Taking the UK as a model, DUSP 1.6.1(b) specifies that 98.5% (virtually all) of Second Class letters have to be delivered by D+3. The condition can be fulfilled by delivering mail on any one of D+1, D+2 or D+3 or a proportion on each day. Assuming that Royal Mail is unwilling to dilute the value of its First Class product by delivering Second Class letters on D+1, Second Class mail is effectively delivered on D+2 and D+3. If we assume that a number of Second Class letters are posted on a Monday then D+1 is Tuesday etc. Some letters could be delivered on Wednesday and some on Thursday. If Royal Mail introduced ADD for Second Class mail then all of the letters would be delivered on Wednesday or all of them on Thursday, depending on the delivery day cycle. From the viewpoint of DUSP 1.6.1(b) the delivery specification would be fulfilled. It therefore appears to be within Royal Mail's power to adopt ADD for non-priority mail without any change in the USO. (It's worth pointing out that the adoption of ADD can possibly lead to an increase in quality from the standpoint of mailers and recipients. If, in the daily delivery scenario, all the mail is currently delivered on D+3, the introduction of ADD means that half of it needs to be delivered on D+2: this effectively changes an average three day service into an average 2.5 day service.)</p> <p>The observation in 7.16 that the UK, France, Germany and Malta are the only countries in Europe in which the USP is required to deliver letters six days a week might be factually correct but these are not the only countries where letters are delivered at this frequency. For instance, the situation in Switzerland is that the USP is required to deliver subscription newspapers six days a week and this leads to letters also being delivered six days a week, even though the obligation for letter delivery is a five day service. Furthermore, Switzerland also has a conventional First Class letters product (A-Post) alongside an economy product (B-Post).</p> <p>It is true that Germany (7.20ff) is considering changes to its regulatory environment but these do not extend to reduction in the delivery frequency. This continues to be specified in Paragraph 19 of the draft postal law as happening every working day, a working day in Germany including Saturdays. In fact, it looks as if Germany might be a model of a well-regulated postal market and a well-managed postal operator as it continues to have the highest level of delivery frequency and the highest levels of mail per capita.</p> <p>The relevance of the observations about Australia (7.24ff) and Denmark (7.27ff) to the UK postal market is doubtful given the profound differences in geography and postal market development between these countries and the UK.</p>

Question	Your response
	<p>The observation in 7.30 that “The trends we continue to experience in the UK (decline of letter volumes and the increase in parcels) are common across the world” is true but it is also important to consider why these trends differ across the world and why the UK experience appears to be worse than in, for instance, Germany. Is it due to poor regulation, poor management or some other factor?</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? – No</p> <p>I am not aware of any.</p>
<p>Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?</p>	<p>Confidential? – No</p> <p>The net avoidable cost methodology appears to be a reasonable method of estimating the financial burden of the USO although the way it has been applied by Ofcom does not inform understanding of the true position currently experienced by Royal Mail. The estimates are incomplete (lacking consideration of intangible benefits) and their ranges are too large to be helpful. It’s as if Ofcom has prejudiced any discussion by publishing estimates that support its desired outcome, a substantial reduction in the universal service.</p> <p>The estimates appear to conflict with Royal Mail’s Regulatory Financial Statements, which in 2023 reported a £170m profit for USO Mail. It would appear that the USO is not the cause of Royal Mail’s problems.</p> <p>Furthermore, Ofcom’s estimates are questionable because they do not identify an optimum number of delivery days. One would normally expect the net cost to level off at some point and then start reducing as cost savings lessened and revenue losses increased. It seems as if Ofcom has severely underestimated the revenue losses inherent in moving to 1 day letter delivery: it seems likely that at some point the revenue would experience a cliff-edge decline as mailers gave up on a mail service that was no longer fit for purpose.</p> <p>The estimates also appear to underestimate the costs of operating 1 day delivery. Do they allow for the fact that six days mail would have to be consolidated into a single delivery? Delivery offices would need to be able to store the mail and delivery staff would be carrying heavier loads and spending more time pushing mail through letterboxes.</p>

Question	Your response
<p>Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?</p>	<p>Confidential? – No</p> <p>It is inconvenient for Ofcom that the Postal Services Act 2011 specifies that Ofcom must determine whether it is unfair for Royal Mail to bear any burden resulting from complying with its universal service obligations but the Act does not provide any guidance about the meaning of “unfair”. It is therefore difficult to avoid the conclusion that any material financial burden is unfair, provided that the estimate of this burden includes all of the benefits of providing the USO, including intangible benefits.</p>
<p>Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?</p>	<p>Confidential? – No</p> <p>Ofcom is much too forgiving of Royal Mail’s failure to manage its business in a way that sustains the universal service. Royal Mail stands in stark contrast to other operators such as Deutsche Post that have managed their businesses much more successfully. Royal Mail’s failure is not a recent phenomenon: it was unable to perform satisfactorily when Postcomm was the regulator and it has, if anything, further deteriorated since Ofcom took over. Perhaps Ofcom’s unwillingness to regulate Royal Mail firmly has contributed to the deterioration.</p> <p>The observation in 8.45 that “it is likely that the net costs of that obligation (or at least part of them) would have to be recovered from users via excess pricing” seems facile and prejudicial. Pricing is almost certainly contributing to declining mail volumes and further increasing prices in order to sustain the USO will only act to accelerating that decline, the so-called “death spiral” of postal services.</p>
<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? – No</p> <p>Ofcom’s failure to assess the effects of options that would allow non-uniform pricing, geographical variation in service levels or alternative delivery points is a serious weakness of this consultation. It is another example of Ofcom prejudicing the outcome.</p> <p>The failure to consider changes to the USO specification for parcels is a further weakness, given that some of these parcels are carried on the same network as letter mail.</p> <p>In contrast to Ofcom’s frequently repeated implication in 9.19 that Denmark has reduced the mail delivery frequency to one day a week it is necessary to point out that other countries, Germany in particular, have not seen it necessary to reduce the frequency below six days a week.</p> <p>In respect to the cessation of Saturday deliveries (9.22) there is merit in investigating a differentiated USO specification which suspends deliveries to SMEs on Saturdays whilst maintaining them to domestic addresses. Royal Mail is keen to continue delivering packets on Saturdays and will therefore</p>

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	<p>be operating a network that can carry mail. Ofcom should consider the merits of making Saturday parcel deliveries mandatory instead of relying on weak commercial forces. Doing so would provide a channel for the continuation of Saturday letter delivery and another day, such as Monday, could be removed from the USO.</p> <p>One would suspect that any substantial reduction in delivery frequency would have a major negative effect on mail volumes as businesses sought alternative ways to communicate with their customers.</p> <p>If delivery frequency were to be reduced it is unlikely that all of the cost savings would be realised. To do so it would be necessary for the workforce to accept root and branch restructuring and job losses without compensation in the form of higher wages.</p> <p>Ofcom's observation in 9.38 that "the purpose of the USO is to act as a safety net to provide a good quality, basic postal service to those whose needs might not be met by the wider competitive market" is misleading in that it suggests that there is a wider competitive postal market. There self-evidently isn't one because Royal Mail has an effective monopoly on the delivery of letters. The safety net therefore needs to be very broad and very strong.</p> <p>Regarding 9.41 I wonder if there is any residual legislation that specifies that certain types of mail must be delivered using priority mail services?</p> <p>The postal sector has had the potential for innovation (9.44) in many areas. Perhaps operators in other countries have been able to exploit these but Royal Mail's recent history does not suggest that it would be equally successful.</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? – No</p> <p>Realistically speaking, any changes to the USO should be gradual in order to avoid any shocks to the postal market. This aim would be best achieved by smaller changes to all specifications rather than a large change to just one. For instance, rather than reduce the delivery frequency to 2.5 days a week it would be better to reduce it to 5 days a week while modifying the product profile and relaxing quality of service targets.</p>

Question	Your response
<p>Question 10: Do you have any other views about how the USO should evolve to meet users' needs?</p>	<p>Confidential? – No</p> <p>There are many aspects of this call for input that are irritating. It comes across much more as an initial consultation about a prospective set of changes to the USO than as a genuine attempt to stimulate discussion. Ofcom has prejudiced this discussion by suggesting changes to the USO such as reducing the delivery frequency to three days a week. The discussion thereby tends towards an evaluation of the merits of these suggested changes rather than taking a wider view of the relevant factors and available options.</p> <p>A fundamental point that Ofcom has avoided in its paper is the effect of Royal Mail's performance on the sustainability of the universal service. An efficient USP would be in a much better position to provide the existing universal service than Royal Mail. Royal Mail's inability to fulfil its universal service obligations, particularly in respect to quality of service, is due to a failure to manage its business properly. The result is a USP that comes to its regulator with the request to reduce those obligations. But unless there is internal reform of Royal Mail there is no reason to believe that the failure will not continue and that Royal Mail won't return to Ofcom soon with yet further requests to relax the USO.</p> <p>It is certainly true that the postal market has undergone substantial change in the last two decades as e-substitution and a growth in the parcels market have had their effects. But it is the responsibility of businesses to respond to such challenges and not, in the case of the resultant decline in mail volumes, simply accept it is an external factor over which they have no influence.</p> <p>Any reform of the USO must therefore be preceded by Royal Mail's acceptance of its responsibility for maintenance of whatever universal service is decided upon and its commitment to undertake the actions needed to avoid its continued decline.</p> <p>It is hard to imagine Royal Mail doing this without an enforcement regime that involves detailed monitoring of its business, the setting of rigorous performance standards, and the imposition of substantial penalties in the event of its failure to fulfil its obligations.</p> <p>Rather than fining Royal Mail for any failures it would be preferable for Ofcom to impose penalties by means of price control mechanisms, possibly linked to legally binding financial bonds, so that the penalties can be channelled back to the users of its mail services.</p> <p>There are several sections of Ofcom's paper that are clearly misleading, particularly when read outside the context of the entire document. This creates the impression that Ofcom is trying to influence readers' thought processes in an incorrect manner. It should not be necessary for a reader</p>

Question	Your response
	<p>to absorb the whole document in order to gain a proper understanding of individual points. Perhaps the problem is due to defective editing of the document but it is difficult to cast aside the impression that the misrepresentation of important information is deliberate.</p> <p>Ofcom has failed to consider a wide range of measures that could be undertaken to modify the current universal service and reduce pressure on it in the future.</p> <p>First and foremost is the provision of services for vulnerable users. Ofcom's omission of any detailed information about the use of postal services by the blind and partially sighted is particularly striking because the Articles for the Blind service is explicitly mentioned in the primary legislation. However, discussion of services for vulnerable users demonstrates that there are aspects of postal services that are really part of social provision and have no direct commercial relevance. The imposition of an obligation to provide something like a free Articles for the Blind service was possible whilst Royal Mail was in state ownership and profitability was a lower priority and when stamp prices were lower and better able to carry the cost of the service and when volumes were high or even growing instead of declining. But privatisation has created a business with commercial priorities and e-substitution makes it unfair to expect mail users to pay for social provision. It is therefore right and proper for services for vulnerable users to be paid for directly by government by means of a universal service support mechanism. Ofcom's paper shies away from a discussion of government subsidy but this is an important tool in sustaining the universal service and has been used in other countries. Ofcom might also consider the application of a universal service compensation fund that raises funds from the providers of broadband services. These are instrumental in the decline of mail volumes and the resultant problems with the viability of universal postal services.</p> <p>Related to the provision of services for vulnerable users is the assessment of the needs of all users. Ofcom's research involves asking users for their opinions about their likely use of postal services. Whilst such a methodology might provide an indication of their perceived needs it falls short of the predictive reliability of methods such as trade-off analysis that require greater involvement in the decision-making process. Before proceeding with any changes to the universal service Ofcom must undertake considerably more research into user needs, with particular emphasis on the needs of vulnerable users and those in remote rural areas, who would be expected to be most seriously affected by those changes.</p> <p>Any relaxation of the current USO must be preceded by a detailed assessment of Royal Mail's current business, with particular attention to its efficiency relative to a baseline that might be reasonably expected. The assessment also needs to model Royal Mail's expected performance in the</p>

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	<p>future in order to determine its ability to provide a universal service. This needs to be followed by the creation of a regulatory regime that provides a high level of confidence that Royal Mail will perform in line with expectations.</p> <p>Ofcom has modelled three scenarios for changing the universal service: (i) a reduction in frequency of delivery for letters, (ii) changes to speed of delivery for most mail and (iii) amending the current QoS targets for existing services.</p> <p>These scenarios need be extended by modelling the effects of changes in universality and uniform pricing.</p> <p>Ofcom appears to have a very narrow interpretation of the meaning of universality, implying that all addresses have the same delivery frequency. But even the current legislation allows the removable of certain addresses from the USO, accepting that the economics of mail delivery dictate that some users need to live with lower service levels. It also seems likely that without a USO an economically and commercially rational postal operator would provide different service levels in different areas, with high delivery frequencies in low cost delivery areas and lower frequencies where costs are higher. The principle of universality can be maintained by recognising that its fundamental element is delivery to all addresses whilst relaxing the requirement that all addresses must have the same delivery frequency. It should be possible to specify a universal service with several delivery frequencies, ranging from high frequencies in low cost areas to low frequencies in high cost areas.</p> <p>Collection frequencies are almost certainly a further driver of costs in Royal Mail's network and it is surprising that Ofcom has not mentioned these in its discussion. However, the maintenance of a high collection frequency from all access points in almost certainly of greater importance to the provision of the universal service than an equally high delivery frequency. It is hard to imagine how Royal Mail could fulfil any quality of service requirements without maintaining a high collection frequency.</p> <p>Pricing uniformity is another factor that needs further consideration. Royal Mail already operates a form of geographic pricing called zonal pricing for its bulk mail services. This system has higher prices where Royal Mail's delivery costs are higher and lower prices where they are lower. The system was introduced to deter market entry by competitors making their own deliveries. There would appear to be no need for it in a market without delivery competition. Ofcom should review the use of zonal pricing in order to determine whether it is deterring the posting of mail to higher cost areas, thereby negatively affecting the universal service. Ofcom refers to distance-based pricing but has not modelled any scenarios which include it. This is probably the right approach because postal</p>

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	<p>costs tend to be driven by delivery operations and considerably less so by transport.</p> <p>There are clearly approaches to postal sector regulation that are effective in other countries. One example is Germany where Deutsche Post provides the universal service voluntarily. It is a pity that it is almost inconceivable that Royal Mail, despite its claim to be proud to be the universal service provider, could be trusted to take a similarly ownership of its responsibilities. Likewise, the reduction of the Danish USO to one delivery a week appears to assume that the national postal operator will actually provide a higher level of service in most places. Once again, it seems unlikely that Royal Mail could be trusted to act in a similar manner. For Royal Mail a USO would be targeted to be hit rather than a threshold to be exceeded. Any proposed changes to the USO therefore need to be made within the context of a rigorously enforced regulatory regime. Ofcom needs to err on the side of caution and specify the service that Royal Mail needs to provide rather than mandate a safety net level of service in the expectation that commercial forces (largely non-existent in the relevant sectors of the postal market) will ensure a higher actual level of service. Serious consideration needs to be given to the reintroduction of comprehensive price control mechanisms that exert sufficient pressure on Royal Mail to improve its efficiency.</p> <p>Having undertaken the detailed assessment of Royal Mail's capabilities, efficiencies and prospect and having also better assessed the needs of mail users, including vulnerable users such as the blind and partially sighted, Ofcom will be in better informed position to investigate possible scenarios for a reformed universal service and associated universal service obligation.</p> <p>An important consideration is the scope of the USO. Royal Mail uses its universal service network for the carriage and delivery of a wide range of services, only a fraction of which are currently designated universal service products. Ofcom would be better able to regulate the market were more of Royal Mail's products designated as universal service products. In the absence of meaningful delivery competition in the letter and small parcels market there appears to be no justification for their exclusion. Their inclusion would improve certainty for mail users. This includes bulk mail and access products which account for the highest volumes of mail delivered using the universal service network.</p> <p>It is helpful to think of the universal service as being defined by several factors which, considered together, demarcate an operating envelope for the USP. These include:</p> <ul style="list-style-type: none"> • Universality • Affordability

Question	Your response
	<ul style="list-style-type: none">• Uniform Pricing• Specific Needs of Vulnerable Users• Delivery Frequency• Delivery Speeds• Quality of Service measures <p>When designing the future universal service Ofcom needs to consider all of these factors. None of them are fixed in stone and some imagination and innovative thinking would lead to their redefinition and modification in ways that will enable Royal Mail to operate within a less constrained envelope whilst providing a service that meets the changed needs of users.</p> <p>All views expressed in this submission are completely my own. I am not representing any organisation, business, trade association, regulatory body, representative body or governmental body whether in the UK or other countries.</p>

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