

## Your response

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<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>Confidential? – N</p> <p>In chapter 4 the consultation document clearly articulates the fundamental objective of the USO and the principles that lie behind it - promoting social cohesion, promoting economic growth and facilitating key interactions between the citizen and the state.</p> <p>The USO is clearly presented as a public good. The SAA is concerned with Electoral Registration which is the cornerstone of the effective conduct of elections delivering elections with results in which the voter can have full confidence. As such the argument for the USO in terms of “democratic engagement, for example the receipt and return of postal votes” and the dispatch of poll cards is well expressed in the document.</p> <p>One of the main criteria for Electoral Registration is residence or connection to an address and as such a reliable postal service which delivers communications to an elector at their registered address is an important part of the democratic process and a vital integrity check within the registration process.</p> <p>The poll card, which is the only piece of communication that by law goes to every elector is sent by post and needs reliably to arrive in time for the elector to be aware that the election is taking place and to understand where and when to vote. It also contains information that allows them to request alternative ways to vote – for example to request a postal vote or to appoint a proxy. Responses to the delivery or non- arrival of a poll card can also highlight that an elector is registered when they should no longer be or should be registered when they are not yet.</p> <p>Postal votes can only be dispatched once nominations close and it is clear who will be on the ballot paper. They then need to be returned to the Returning Officer in time to be counted.</p> <p>The current election legislation defines a timetable for electoral events which makes assumptions about the speed of delivery of letters -poll cards and postal votes.</p>

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	<p>This obviously has implications for any adjustment to the USO particularly if it were to impact delivery speeds.</p> <p>Sound and effective elections are currently built on reliable postal services to expected delivery schedules across the whole of the UK. If there are changes to these services then the current electoral timetables would no longer be sufficient and there may be an argument for lengthening the timetable. Without the USO electoral law would need to change.</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>Confidential? – N</p> <p>The assessment of the developing market conditions is accurate in general. However what is not clearly articulated is that electoral law currently requires the physical existence of paper poll cards – to every elector - and of paper postal votes. In addition the annual canvass for Electoral Registration still relies on the issuing of canvass forms to households and while email has a role to play within this a substantial number of canvass forms are issued and require a response from the household to help maintain the completeness and accuracy of the Electoral Register. These are major bulk mailings affecting the whole of the UK fundamental to democratic engagement which as explained in the document is a public good primarily for social cohesion. The market here can only change if electoral law changes.</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>Confidential? – N</p> <p>The assessment of the bulk mail market is sound. However as noted throughout this document current electoral legislation requires paper poll cards and postal votes which are dispatched to current schedules and delivery speeds.</p> <p>There is a general shift to digital communications channels, but these are not yet fully trusted with respect to their deployment nor are they yet permitted in law.</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>There are several circumstances that could precipitate a significant change in demand for bulk mail around elections. The recent pandemic saw a huge growth in postal votes across the country growing from under 20% to over 25% of the electorate.</p>

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	<p>There is a stated assumption that there will be increased digital engagement with citizens. However a major cyber security incident around electoral integrity, and these are high on many risk registers at present, may well erode confidence in digital solutions and force a return to paper based solutions delivered by post to which the current USO is a fundamental assumption.</p>
<p><b>Question 5: Do you agree with our proposed approach to estimating the financial burden of the USO?</b></p>	<p>Confidential? – N</p> <p>The approach taken to estimate the financial burden of the USO seems valid. However there are assumptions within this model which are based on how Royal Mail may react to hypothetical developments in the market. While the model is valid its conclusions do need to be treated with caution and a major decision with huge implications for social and economic conditions cannot be taken solely on the basis of such a model. There are public goods which a society may choose to fund.</p>
<p><b>Question 6: Do you agree with our considerations regarding the unfairness of the financial burden of the USO?</b></p>	<p>Confidential? – N</p> <p>Given the factors identified in the analysis there is a clear argument that the USO does represent an unfair financial burden to a commercial operator operating within a competitive and fluid market.</p> <p>This however is not an argument for the removal of the USO. If the USO is seen as a public good then the argument is for the financial burden to be addressed fairly not for the USO to be removed.</p>
<p><b>Question 7: Do you agree with our considerations regarding the impact of the financial burden of the USO?</b></p>	<p>Confidential? – N</p> <p>As noted above while the consideration of the financial burden of the USO is important conclusions are not necessarily arguments for the removal or modification of the USO. If the USO in its current form is an important public good – and it may be argued that it is particularly important to support democratic participation through postal voting and communications around electoral registration and elections – then a financial burden is not a reason to remove the USO or modify it in significant ways but a reason to address the financial element separately or for market intervention.</p>

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<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>The options identified for changes to the USO ((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) are analysed in terms of the impact on residential (including vulnerable) users, SMEs and bulk mail users.</p> <p>However there is a fundamental element that is missing in the analysis in that the current electoral processes as governed by current electoral legislation across the UK is predicated on the current delivery speed for letters.</p> <p>The poll card, which is the only piece of communication that by law goes to every elector is sent by post and needs reliably to arrive in time for the elector to be aware that the election is taking place and to understand where and when to vote. It also contains information that allows them to request alternative ways to vote – for example to request a postal vote or to appoint a proxy.</p> <p>Postal votes can only be dispatched once nominations close and it is clear who will be on the ballot paper. They then need to be returned to the Returning Officer in time to be counted.</p> <p>The current election legislation defines a timetable for electoral events which makes assumptions about the speed of delivery of letters -poll cards and postal votes. This obviously has implications for any adjustment to the USO particularly if it were to impact delivery speeds.</p> <p>Sound and effective elections are currently built on reliable postal services to expected delivery schedules across the whole of the UK. If there are changes to these services then the current electoral timetables would no longer be sufficient and there may be an argument for lengthening the timetable which would require legislative change.</p>

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<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>Confidential? – N</p> <p>As noted above, the pressures resulting from the USO from changing market conditions are not necessarily justification for removing or modifying the USO. Rather if the USO is seen as a fundamental public good especially around the support for social cohesion around democratic participation then the question should be how to address these pressures. That may be through funding changes or other market intervention.</p> <p>If there are changes to the USO that impact on delivery speed or schedule then the SAA would request that there is an analysis of how this would impact on electoral registration and the conduct of elections. Such changes might require revision to electoral legislation to lengthen timetables to ensure that they still include sufficient time for electors to be contacted and for postal votes to be sent and returned. It is understood that there may be an effort to prioritise reliability over speed but the electoral timetable as defined in statute relies on both speed and accuracy of delivery. The effect of any changes on the current electoral timetable cannot be overstated.</p>
<p><b>Question 10: Do you have any other views about how the USO should evolve to meet users' needs?</b></p>	<p>Confidential? – N</p> <p>The SAA leads on the delivery of electoral registration in Scotland and is always looking to keep the interests of the elector at the centre. For Scotland there are huge areas of the country which are rural and remote from cities, particularly in island communities. The arguments made throughout this paper with respect to the USO being a public good apply especially to citizens as voters in these communities. For them to participate in the democratic process on the same basis as urban voters they need to be served by the same schedule and speed of delivery. There must be no revision to postal services that would relatively disenfranchise voters in rural or island communities. Again, if the postal service is changed then there would need to be a change to the electoral timetable to recognise that the basis on which the election is to be operated has been fundamentally modified.</p>

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	<p>The Association of Electoral Administrators has submitted their own response to this consultation their conclusion is clear and explicit “The UK’s electoral system relies on Royal Mail. It relies on timely deliveries of vital information. It relies on postal voters trusting their vote to the universal postal service.” The SAA supports this statement.</p>

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