

Ofcom Advisory Committee for Scotland (ACS) Response to Consultation on Review of Regulatory Conditions - Postal Regulation

ACS welcomes the opportunity to respond to the consultation document on Postal Regulation. We are broadly in agreement with the proposals, particularly the retention of uniform and affordable pricing across the UK. This is a key issue in many rural (and indeed non-rural) areas in Scotland. Most alternative carriers add large surcharges for the delivery of packets and parcels to certain postcodes, regardless of their actual remoteness, including for example, the whole of the city of Inverness.

ACS has focused its detailed response on two areas which are particularly relevant to Scotland at present.

Q5.1 Do you agree with a proposed condition to require Royal Mail to provide a universal postal service in line with specified characteristics, which requires them to meet specified standards; requires the provision of access points to particular criteria and which will now also require them to publish a list of universal service products, and to notify us and customers of any changes to that list? If not, please explain why.

Density of letter boxes and access points in urban areas

In response to the proposals in sections 5.21-5.31, regarding provision of access points and particularly density of postal office letter boxes in non-rural areas, ACS strongly supports a review of the density criteria imposed by DUSP 3.2 (currently DUSP 1.6.2 in Annex 10 of the Condoc).

The current requirement is that:

(a) in each postcode area where the delivery point density is not less than 200 delivery points per square kilometre not less than 99% of users of postal services are within 500 metres of a letter box, and
(b) the distribution of access points capable of receiving the largest relevant postal packets and registered items is such that –
i. in the UK as a whole the premises of not less than 95% of users of postal services are within 5 kilometres of such an access point, and
ii. in all postcode areas the premises of not less than 95% of users of postal services are within 10 kilometres of such an access point, and such access points are available to the public in accordance with conveniently published schedules

A *postcode area* is the area covered by the letters before the first number of a postcode. For a more rural postcode, this can cover an enormous area; e.g. IV, Inverness, stretches all the way from Forres in the East to the Isle of Skye in the West, and up to Durness and the North coast of Scotland. It also includes a city and several large towns. It is hard to see why those living in these urban areas should not have the same safeguards as those living in smaller settlements in other postcodes. It would be reasonable to give some kind of intermediate target like that under a) above, at least for each postcode district: i.e. the area covered by the alphanumeric before the space, e.g. IV12, Nairn) as well.

Despite the claim in section 5.27 that there has been no ‘significant level of complaints about the density of post boxes in urban areas in the past’, ACS considers that the positioning of post boxes in urban areas is an important issue. For example, local councillors in Scotland still receive a lot of correspondence concerning the delay in putting up post boxes on new estates. A particular irritant is how long it takes to get Royal Mail to accept that there is a reasonable need for a post box on a new estate, and then the further 6 -12 months it actually takes before they install it. Any

way of encouraging Royal Mail to speed up this process and reduce the bureaucracy involved would be welcomed.

Variable delivery times

Another issue which is not explicitly mentioned in the consultation document, but which ACS considers important, concerns the timing of deliveries. Clearly a requirement to deliver at a given time would be unreasonable, and there will be occasions when there are delays due to bad weather, etc. However, particularly for SMEs, knowing roughly when your post is likely to arrive each day is extremely important. ACS considers there should be an attempt to make the delivery time similar each day. Currently in more rural areas it appears to depend on who is doing the round as to the order they do it in, and rotating shifts make this unpredictable. Two members of ACS have had personal experience of post arriving at 10 am some days, and 4 pm other days, with no predictable pattern to this; other anecdotal evidence suggests this is fairly common. It is clearly important for a business to know if its post is likely to arrive in the morning or in the afternoon. Businesses do not want to pay staff to arrive at 9 am to process mail or sign for registered letters if the post does not arrive until 4 pm that day. People can learn to accept later delivery times, but there does need to be a consistent pattern. We would urge Ofcom to consider ways this can be encouraged without excessive regulation. Perhaps a requirement to notify customers if delivery times are likely to differ by over 3 hours more than 3 times over a 14 day period might be adopted as a general rule.

Ofcom Advisory Committee for Scotland

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