

Your response

Question	Your response
<p>Question 2.1: Do you agree with Ofcom’s proposed regulatory approach for regulating postal services over the next 5-year period (2022-2027)? If not, please explain the changes you think should be made, with supporting evidence.</p>	<p>Confidential? N</p> <p>We believe that nobody should be disadvantaged unnecessarily by the rural location in which they live. We agree with the overall USO framework, however we believe the USO should be extended to cover tracked products, both first and second class.</p>
<p>Question 3.1: Do you agree with our proposed approach to sustainability of the universal service? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? N</p> <p>Royal Mail’s status as the only significant letter delivery company in the country is the basis upon which cross-subsidy can be generated to support the USO to the most rural places. Retail competition for bulk mail may have been generated in urban areas, but this is ‘cherrypicking’ more profitable parts of the mail market that undermines the business case of the USO. Instead, the USO should be wider, the stamp price cap retained for longer and income generated to sustain it by dropping the access regulation.</p>
<p>Question 4.1: Do you agree with our proposal to maintain the historic approach but with the additional requirement on Royal Mail to set and report against a five-year expectation? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? N</p> <p>Yes. However, Ofcom’s encouragement through regulation of greater automation of parcel handling services must avoid increasing centralisation that will make it harder for rural residents to collect parcels that fail to deliver.</p> <p>Alternatively, Ofcom could actively encourage collaboration between Royal Mail and the Post Office to ensure there are Pick Up and Drop Off points in every rural community.</p>
<p>Question 4.2: Do you agree with our proposals in relation to the monitoring and publication of the efficiency expectations prepared by Royal Mail? Please substantiate your response with reasons and evidence. Please</p>	<p>Confidential? N</p> <p>Yes</p>

<p>substantiate your response with reasons and evidence.</p>	
<p>Question 5.1: Do you agree with our proposed approach of maintaining the current regulatory safeguards of the safeguard cap, high quality of services standards, and requirements on access to universal services? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>Yes.</p>
<p>Question 5.2: Do you agree with our proposal to not impose further regulatory requirements on Royal Mail in relation to Redirection pricing, following implementation of its improved Concession Redirection scheme? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>Yes. However Royal Mail should be required as part of its performance monitoring to publicise effectively Concession Redirection</p>
<p>Question 5.3: Do you have any further evidence on other issues raised in this section?</p>	<p>Confidential? – N</p> <p>No</p>
<p>Question 6.1: Do you agree with our assessment of the parcels market, namely that it is generally working well for consumers, but improvements are needed in relation to complaints handling and meeting disabled consumers' needs? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>The USO is required because there is a risk of market failure in both mail and parcel services in rural areas. Overall, rural people would probably prefer more active investment and regulation by Government to ensure a seamless and efficient universal post office, PUDO and mail service. The market, averaged across all urban and rural areas, may appear healthy, but the result of multiple providers competing on price mainly for urban business creates, for rural people, a confusing and hard to access market in parcel collection and delivery.</p>
<p>Question 6.2: Do you agree with our assessment of the consumer issues in relation to complaints handling and our proposed guidance? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>Yes</p>

<p>Question 6.3: Do you agree with our assessment of the issues faced by disabled consumers in relation to parcel services and our proposed new condition to better meet disabled consumers' needs? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>Yes</p>
<p>Question 7.1: Do you agree with our proposal not to include tracking facilities within First and Second Class USO services? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>No. Inclusion in the USO would ensure that rural people are not unnecessarily disadvantaged by where they live.</p>
<p>Question 7.2 Do you have any further evidence or views on other issues relating to USO parcels regulation? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p>
<p>Question 8.1: Do you agree with our proposals on the scope of access regulation? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>No. Royal Mail's status as the only significant letter delivery company in the country is the basis upon which cross-subsidy can be generated to support the USO to the most rural places. Retail competition for bulk mail may have been generated in urban areas, but this is 'cherry-picking' more profitable parts of the mail market that undermines the business case of the USO. Instead, the USO should be wider, the stamp price cap retained for longer and income generated to sustain it by dropping the access regulation.</p>
<p>Question 8.2: Do you agree with our proposals on access price regulation? Please substantiate your response with reasons and evidence.</p>	<p>Confidential? – N</p> <p>No, for the reasons given above.</p>

Question 8.3: Do you agree with our approach and proposals for the non-price terms of access regulation? Please substantiate your response with reasons and evidence.

Confidential? – Y / N

No, for the reasons given above.

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