

Title:

Mr

Forename:

Michael

Surname:

Peterson

Representing:

Self

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Additional comments:

I am responding from the Shetland Islands, where Royal Mail is still regarded as one of the essential linkages with the rest of the UK. If the requirement that it maintain a UPS is compromised in any way, then shame on Ofcom.

Question 5.1: Do you agree with the assumptions set out in paragraph 5.86 above? If not, please set out your reasons.:

Essentially no. Royal Mail is one of the few great institutions (and I underline the word 'institution', rather than use the epithet 'company') which unifies this increasingly disunited United Kingdom.

The UPS must remain sacrosanct.

Question 6.1: Do you agree with our proposal to impose a regulatory condition on Royal Mail to require it to provide the universal service as set out above? If not, what alternative approach would you suggest?:

Royal Mail must continue to provide a UPS. Whether it needs to do so on six days a week is quite another matter.

Question 6.2: Do you agree that a price control is not an appropriate option at present for regulating Royal Mail's prices? If not, please explain why and how a price control could be implemented effectively.:

No. Price control set by reference to the RPI is entirely viable.

Question 6.3: Do you agree with Ofcom's proposals to put in place regulatory safeguards as described above? If not, please provide reasons.:

Ofcom's proposal to grant Royal Mail commercial freedom is shown to be entirely false when it is forced to deliver mail from commercial mail companies.

Question 6.4: Do you agree with Ofcom's proposals to put in place a monitoring regime? If not, please provide reasons.:

Yes - providing effective parameters are set, although I see little evidence of this in the consultative paper.

Question 6.5: Do you agree with Ofcom's proposals for an index-linked safeguard cap on standard letters from 45p to 55p? If not, please provide reasons.:

No. It has been my view for a long time that 1st and 2nd class mail should be scrapped, and that all mail (including Mailsort) is treated as one class. By all means index-link new postage rates though, once the classes have been amalgamated.

Question 6.6: Do you agree with Ofcom's proposal that the approach outlined above remains in place for seven years? If not, please provide reasons.:

No comment.

Question 7.1: Do you agree with our approach to assessing end-to-end competition? If not, please give your reasons.:

Royal Mail's competitors should stand on their own feet or leave the business to Royal Mail. Legislation which forces Royal Mail to deliver mail from commercial companies should be annulled.

Question 7.2: Do you agree with Ofcom's proposals to impose an obligation on Royal Mail to provide access at the Inward Mail Centre? If not, please give reasons.:

No - for the reasons outlined in 7.1.

Question 7.3: Do you agree with Ofcom's proposals in respect of regulating margin squeeze? If not, please give reasons.:

No comment.

Question 7.4: Do you agree with our approach concerning the Terms and Conditions for access, including the role of equivalence and the regulation of zonal pricing? If not, please give your reasons.:

No. Paragraph 7.102 refers to 'no undue discrimination'. In my view the word 'undue' should have been removed to ensure there is no discrimination.

Question 8.1: Do you agree with the objectives for regulatory financial reporting that we have set out above? Please provide details to support your response. :

I have no comment.

Question 8.2: Do you agree that our regulatory financial reporting proposals, set out in this section and the supporting Annex, are appropriate and proportionate? Please provide reasons and evidence to support your views.:

No comment.

Question 8.3: Do you agree with our proposals on the rules and requirements contained in the draft Regulatory Accounting Guidelines and do you consider that they are likely to provide an appropriate and proportionate level of cost transparency and accounting separation?:

No comment.

Question 8.4: Do you agree with our proposals set out above in relation to accounting separation? Are there any further risks that you think Ofcom needs also to consider in making decisions in this area? To the extent that you consider there to be risks associated with our proposals, how do you consider they might best be addressed?:

No comment.