

Additional comments:

As stated in previous submissions I object to this being an opt out rather than opt in scheme and object to having to deface my front door with a Royal Mail sticker. However, much more serious would be the inclusion of Recorded Signed for items in the scheme as there are currently many defects in the system that should be rectified before any relaxation is even considered.

Question 1: Do you agree that Ofcom should grant approval to Royal Mail for the Delivery to Neighbour service? If not please explain your answer. :

No.

I view with very great concern that you are in favour of allowing inclusion of the Recorded Signed for service for the following reasons.

- Security, Confidentiality and Data Protection
- unreliability of the service and lack of robustness of the system
- Delivery failures and failures with the Track and Trace system
- Royal Mail assumed loss policy
- Insistence on the use of the Royal Mail Form P58 to situations that it was not designed for

I have had considerable experience of this service both as a sender and addressee and have experienced multiple failures with items sent and received. I have had multiple contacts with the Chairman and Chief Executives Office about these very many failures. I have never been satisfied with the outcome and believe that what you propose to accept will exacerbate the many systems failures that continue to occur.

Items that are sent to customers by Recorded Signed For are very often confidential and may also contain information that would be useful in fraud and identity theft. The identity and status of the sender is usually clear from the information on the envelope and this can both directly and indirectly indicate what the envelope may contain. Apart from the security risks I believe that this will be in breach of data protection since it would reveal confidential information about the addressee to a third party neighbour.

The Royal Mail website states 'If you have an important item to deliver, our Recorded Signed For™ service gives you complete peace of mind with proof of posting and an electronic copy of the signature available online.' It says you get Proof of posting, Signature on delivery and Online confirmation of delivery. In my experience these are incorrect statements. See above and later.

It also says 'You can confirm delivery of your item online and obtain a copy of the signature of the person who signed for the item. Please note that is not a fully tracked service. Recorded Signed For™ provides you with confirmation of delivery only.' In my experience this is also incorrect. See above and later.

The website FAQ's include the following:

Can I confirm the delivery of my item?

If you would like to confirm delivery of your item online, use our online Track & Trace service.

Will I always get a signature and does the person named on the address label sign for the item?

We make sure we get a signature from whoever receives the item, but bear in mind that this may not be the person named on the address label. If there's nobody available to sign for the item and the item is not collected or redelivery rearranged within 18 calendar days, we return your mail free, with a note saying why we can't deliver it. On the rare occasions that we don't get a signature for any other reason, we'll refund your money.

In my view these also contain incorrect statements. See above and later.

As an addressee I have had confidential and important Recorded Signed for items put through my letterbox as normal mail when I was at home with no attempt being made to obtain a signature. The track and trace system then cannot record delivery and signature.

As a sender the failures fall into four categories where it follows that there is also a failure of the Track and Trace system.

- where it is impossible to determine if an item was delivered.
- where it has eventually transpires that an item has been delivered but it has not been recorded and/or signed for.
- where an item has been delivered but no signature obtained.
- where an item has been delivered and probably signed for but not then entered into the system

In my view the whole system is defective in that it records and shows that an item has been posted but does not alert Royal Mail to the fact that there has been a system failure. An item scanned in but no item scanned out should ring alarm bells without the need for customer involvement. It relies entirely on the sender or recipient to alert Royal Mail to the failure.

The addressee often does not know that an item has been sent or is expecting an item but at some unknown future date. It follows that addressees cannot know that an item has gone astray when they are unaware that it has been sent.

What makes this worse is that you have to wait up to 5 days to see if an item appears on the Track and Trace system. By then the trail may have gone cold and this is despite the fact that the website says 'With Recorded Signed ForTM, you get next day delivery with most First Class items.' However, it also says:

'Can you guarantee next day delivery with Recorded Signed ForTM?

We can't guarantee next working day delivery, so if you need that confirmation, use our Special DeliveryTM 9.00am service or Special DeliveryTM Next Day service.'

Royal Mail will not make any enquiries about an item and has an assumed loss policy. This policy operates even though an item may have actually been delivered by them. I have experienced this a number of times where they have assumed loss and then a response from the addressee shows that the item was delivered but has not been recorded as delivered.

The next problem is that loss is only assumed after 15 working days from the due date of delivery - that in itself is difficult to determine. This then could be up to 21 calendar days

from the due date of delivery - whatever Royal Mail may deem this to be. By then the trail has gone very cold indeed.

Remember that the Royal Mail website states 'If you have an important item to deliver, our Recorded Signed For™ service gives you complete peace of mind with proof of posting and an electronic copy of the signature available online.'

The Royal mail website also says 'You can ask for a Recorded Signed For™ fee refund if we are unable to provide proof of delivery.' and 'On the rare occasions that we don't get a signature for any other reason, we'll refund your money.'

Unfortunately it is not that simple because they insist that you complete their Form P58 that is designed for lost, damaged or delayed items. This may be due to their assumed loss policy - that operates even when there has been no loss and the problem has been a failure to operate the system. The form P58 is totally inappropriate when it is known that delivery did in fact take place but it appears that there is no form for that situation.

I have recently been refused a refund in these very circumstances unless I complete an inappropriate form P58. I have had to completely amend and endorse the form to make it appropriate for the purpose.

In addition Royal Mail insists that you send them the original postal receipt. They apparently cannot see the irony of insisting that you send an original proof of posting by post to prove that you have sent an item that has been lost in the post! Presumably they would still require the original if that also went astray?

With Track and Trace items they should not need this anyway since proof of posting is already shown on their track and trace system.

It is my view, based on my experiences, that the system is currently not fit for purpose and that, until it is improved, you should not allow any relaxation that could act against the interest of customers and cause them more problems by adding another layer of uncertainty when things go wrong.

Question 2: Are there other consequences following the roll out of the service across the UK that we have not included in our assessment? If so, please explain.:

Yes.

I think that Ofcom has failed to consider the many and varied uses of the Recorded Signed For system and have made their assessment based only on its use for the sending of parcels and items ordered online and by mail order.

Question 3: Do you have any comments on the scope and wording of the proposed Notification and approval:

Yes. As above.

Please do not respond to this email, it is an automated record of your submission.