

Consumer Futures

Michelle Koretz
Ofcom
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22 November 2013

Dear Michelle,

Ofcom consultations on the proposed directions relating to exceptions to the postal collections and deliveries Universal Service Obligation

Consumer Futures welcomes the opportunity to respond to Ofcom's consultation documents on the proposed directions relating to the:

- Exceptions to the postal collections universal service obligation and minor amendment to designated universal service provider condition 1
- Exceptions to the postal deliveries universal service obligation and approval of alternative delivery points.

Engagement in dialogue on these issues is important for individual consumers and businesses. Consumers, as both senders and recipients of mail, require good access to collection points, including post boxes and business boxes, to enable their mail to enter the postal network as well as assurances that delivery points will only be excepted in exceptional circumstances or in response to customer request. It is essential that for both collection and delivery exceptions appropriate and clear processes are in place to ensure customers are made fully aware of the reasons for the exception decisions and their right to appeal if they disagree with the decision made by Royal Mail.

Consumer Futures considers that the changes that Ofcom proposes are beneficial and in the consumer interest and will bolster the current arrangements in place especially:

- Consolidating the permanent and temporary delivery and collection exceptions processes
- Strengthening and improving the appeal and review process with the removal of time limits on bringing appeals
- Ensuring that Royal Mail has to review delivery exceptions on request
- Requiring concrete steps to be taken to protect users, particularly users whose circumstances may mean that they are vulnerable

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Collections Exceptions:

Consumer Futures supports Ofcom's clarification of density requirements and the revision of DUSP 1.8 to reflect this. It is important that post box access points that are subject to exceptional circumstances with suspended collections are not included for the purpose of assessing Royal Mail's compliance with the access points criteria. However, in order to ensure that the access criteria is effectively monitored it is also essential that there is accurate reporting by Royal Mail of any removals, relocations and installations of post boxes and confirmation of a clear consumer-oriented notification process for post box removals and/or relocation as set out in our response to Ofcom's March 2013 consultation on regulation of the provision of post boxes. We would therefore suggest that DUSP 1.8 should be further amended to reflect the reporting and notification requirements.

Deliveries Exceptions:

Consumer Futures believes that all consumer contacts on delivery exceptions issues should be managed centrally through the Royal Mail Customer Services team rather than through the local delivery office. This should assist in streamlining contacts on these issues and also assist in improving awareness by consumers of the correct process including their right to appeal. Addressing customer contacts on these issues through the Royal Mail Customer Services team and ensuring they are actively and appropriately dealt with by the local delivery office on the customer's behalf would ensure that accurate records of contacts and complaints are recorded, delivery offices actions and compliance with processes are properly monitored and could also incorporate generation of automatic reminder to the delivery office management team.

Ofcom also needs to take steps to ensure and verify that the correct procedures are followed by Royal Mail in designating a property as a delivery exception and notifying users of their right to a review and also in ensuring that Royal Mail provides re-notifications or reminders to addresses excepted for two years or more .

As you are aware Consumer Futures is the operating name for the National Consumer Council and, subject to Parliamentary approval, it will become part of the Citizens Advice Service on 1 April 2014 with our role transferring to the National Association of Citizens Advice Bureau, The Scottish Association of Citizens Advice Bureau and The General Consumer Council of Northern Ireland and this prospective change should be reflected in s.2 of the schedule to each direction.

Yours,



Michelle Goddard

Head of Postal Services