

I see from your website that consultation is still open until 11th September, but the online form still says that the deadline was 24th August. As the points I wish to make are few and brief, I hope that this email is acceptable.

Given the “success” of the pilot schemes (as described), it is understandable that the Post Office would wish to roll this out nationally, and derive operational efficiencies from so doing. It can then be seen that this is justified as a means of defending the universal service. However, there are points in the consultation document where the logic, and the evidence, appears to me to have been strained:

P739 Cards

There is some discussion of a beneficial impact through fewer P739 cards being issued, and fewer items returned to Delivery Offices. The tendency is to accept that this is a benefit. However, at 5.7 it is acknowledged that there is an ongoing problem with postmen leaving P739 cards when they have made no attempt to deliver the item. Personal experience is that this happens not infrequently, even at times when there was a person in the house to accept delivery. If the underlying fact pattern is that these items were never on the delivery cart, and did not leave the Delivery Office, the issue of these cards becomes less mysterious.

One can see that the introduction of Delivery to Neighbour would help with the statistics, and make it harder for the particular abuse to be perpetrated. But this does not deal with the underlying issue, namely that abuse of the P739 card system evidences a belief by the issuers of these cards that it is alright to shift responsibility for final delivery to the customer. *The Delivery to Neighbour system embodies that belief, and (to that extent) dilutes the ethics of a universal postal service.*

Competitive position

There is a statement that Royal Mail is disadvantaged, relative to other parcel deliverers, in that the latter (including Parcel Force) are already permitted to discharge their delivery obligations by delivering to some other location (eg a neighbour).

However, the example quoted at 5.17 shows that the terms of business of TNT permit a customer (either the sender or the receiver) to give specific instructions to deliver to alternate addresses. It does not say that TNT reserves the right to deliver to an alternative address chosen by itself, without reference to the express wishes of the customer.

It may be that this is the case, but 5.18 references 5.17 to establish the competitive disadvantage, and plainly fails to do so.

Consumer Choice

The discussion at 5.24 of the benefits to consumers makes the astonishing statement that consumers will have “*greater choice*” in the way they receive deliveries. *This is a misrepresentation of the position.*

What is proposed is that consumers have a single global choice whether to allow Delivery to Neighbour (in which case they cease to have the options to require redelivery, or to pay for delivery to a Post Office, which now arise after the receipt of a P739) or to opt out, in which case their choices presumably remain exactly the same as now.

Erosion of service

Generally, it seems not wholly improbable that the effects of opting out (and displaying a “prominent sticker” on the door, thus incidentally being invited to demonstrate to all and sundry that one is not a “good neighbour”) may include a negative impact on service.

For instance, if a customer opts out, postmen may conclude the chances of delivering are reduced, leading to a greater tendency to leave parcels in the Delivery Office with the intention of issuing a P739 card. *These are issues that do not seem to be addressed in the consultation document.*

London

At 5.30 it is noted that there were no trials in London, but that Postcomm considered at the time of approval of the initial trial that other areas where trials were to be conducted “contained urban environments”. It is not stated what analysis, if any, was conducted to extrapolate from Swansea East to Central London. There are many and obvious differences between these environments, not least the fact that in many parts of London nearly everybody goes out to work, so they are simply not available to take in each others’ mail.

I hope that these points can be taken into consideration, although as the Royal Mail has already embarked on the roll-out of the scheme, the outcome of the consultation process seems to have been assumed.