

**Title:**

Mr

**Forename:**

Andrew R

**Surname:**

Young

**Representing:**

Organisation

**Organisation (if applicable):**

The Letter Box Study Group

**Email:****What additional details do you want to keep confidential?:**

No

**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

**Additional comments:**

We will e-mail our response separately as a MS Word document **(included below)**

**Question 4.1: Do you agree with Ofcom's analysis that the current regulatory requirements for the provision of post boxes should be modified?:**

The Letter Box Study Group agrees

**Question 5.1: Do you agree with Ofcom's proposed new criteria? Please provide evidence to support your view. :**

The LBSG welcomes the new criteria but has reservations.

**Question 5.2: Do you think other criteria than those discussed in our consultation should be adopted? If so, please give your reasons and evidence.:**

Yes - please see the detailed LBSG response e-mailed separately

**Question 5.3: Do you have any other comments on the issues raised by this consultation?:**

Yes - please see the detailed LBSG response e-mailed separately

**Submission of the Letter Box Study Group to Ofcom consultation on the regulation of UK post box provision**

30 April 2013

By Andrew R Young

Chairman

For and on behalf of the Letter Box Study Group

**Submission Summary**

The Letter Box Study Group (LBSG) welcomes the [proposals](#) published by Ofcom on 23 March 2013 regarding the regulation of the provision of post boxes in Britain. In this submission, the LBSG highlights some appropriate context and asks Ofcom to write some additional provisions into the finalised policy document.

- The LBSG congratulates Ofcom for researching and delivering a comprehensive, thoughtful, timely and pertinent report. It gives a warm welcome to proposals on post box provision that serve to extend protection, for the first time, to many boxes in rural areas
- It notes that the new proposals lift Royal Mail from a position of regulatory non-compliance to one of full-compliance in one step
- It would like Ofcom's proposals to protect historic and rare specimens of post box. It draws Ofcom's attention to the 2002 Joint Policy Statement from English Heritage and Royal Mail, and requests that new regulations extend a mandate to Royal Mail to adhere to the 2002 Joint Policy Statement
- It encourages Ofcom and Royal Mail to utilise the specialist knowledge available from the organisations such as the British Postal Museum and Archive and the Letter Box Study Group.

### **Detailed submission**

*The LBSG exists to study and conserve the heritage and history of the British roadside letter box. It was founded in 1976 and has a 600-strong membership. Members' views have been canvassed in preparation of this submission.*

1. *The LBSG recognises that changing patterns of population and postal service use need to be reflected in patterns of post box provision. Nevertheless, **it urges policymakers to extend a guarantee to secure the future of all 115,500 letter boxes in the Royal Mail estate.***
  
2. *The LBSG acknowledges that Ofcom's proposed rule of providing a post box within half-a-mile of 98 percent of UK addresses is a significant new protection for very many rural letter boxes. The LBSG also notes that the Royal Mail has failed, by a wide margin, to meet the provisions laid down by Ofcom's predecessor regulator, Postcomm. If the new proposals are put in place, Royal Mail will leap from a position of regulatory non-compliance to one of complete compliance.*

*Postcomm's previous stipulation was that, in postcode areas with at least 200 addresses per square kilometre, 99 percent of users should have a post box within 500 metres. This applied to 61 of the UK's 121 postcodes, or about 20 percent of the UK by geographical area. The LBSG notes that the Royal Mail is failing to meet the Postcomm regulation in 41 of these 61 postcodes. Further, the LBSG notes that Royal Mail currently meets Postcomm's '99 percent rule' in just 20 of the UK's 121 postcodes.*

*Royal Mail's non-compliance, Ofcom concludes, has had little detrimental effect. There is, Ofcom says, "no evidence of consumer harm or that the current network does not meet the reasonable needs of users now". The LBSG appreciates that it is practical to adjust the regulations to fit with prevailing current circumstances. It is hard, perhaps impossible, to turn back the clock. However, the LBSG is concerned that a precedent of non-compliance may have been set, and sees danger if Royal Mail is permitted further abrogation of its responsibilities. **The LBSG urges Ofcom to ensure that Royal Mail is held to its new obligations.***

3. *The LBSG strongly supports the Joint Policy Statement (JPS) issued by Royal Mail and English Heritage in 2002. This document ([web link attached here](#)) has recently been re-endorsed by the Department for Culture, Media and Sport as still representing government's policy. The agreement was extended in 2007 to include Historic Scotland. As part of the framework now being outlined by Ofcom, the LBSG would*

now like to see a similar agreement in place with Cadw in Wales and the Northern Ireland Environment Agency.

The LBSG draws Ofcom's attention to this important document on letter box protection and maintenance. **It suggests it is essential that Royal Mail, and sub-contractors such as Romec which hold responsibility for implementing obligations, are made fully aware of the JPS and the commitments therein.** The LBSG experience suggests that the obligations are often breached, and maybe not known about. For example, our members often find examples of post boxes that are awaiting repainting well after the stipulated maximum three year cycle. Perhaps more troubling is that letter boxes more than 100 years old – letter boxes that occupy an invaluable position in Britain's communications heritage – have been removed in violation of the JPS.

4. The LBSG appreciates that Ofcom's primary concern with letter boxes is to ensure they are serviceable and useful. One LBSG member consulted ahead of this submission wrote: "It is a pity that Royal Mail cannot look after the postboxes they already have. One big criticism is that a large percentage of them in some postcode areas don't have the day tablets displayed in them and others have the wrong style collection plate fitted which covers up the area where the tablet holder should be also some have no plate at all and finally some have the same day tablet showing all week.

*In my 38 years with Royal Mail anything missing from the post box left customers with no confidence that the box was in service so naturally they went to one that displayed all the information correctly."*

The LBSG asks Ofcom to oblige Royal Mail to recognise that letter boxes have an iconic status, valued in many cases by the public beyond mere utility; and many boxes are rare and/or historically important.

Royal Mail says it has 'voluntary agreements' with English Heritage and Historic Scotland which recognise the wider value of the post box network. The LBSG believes Ofcom should urge Royal Mail to act in accordance with the 2002 Joint Policy Statement when making decisions related to post boxes. In instances where there is no alternative to removing a historic post box (for example where it has become structurally unsound) Royal Mail should ensure that a replacement box is chosen with care and sympathy for the imperative of heritage. **We urge Ofcom, and Royal Mail, to make use of the specialist knowledge on letter boxes available from organisations such as The British Postal Museum & Archive and The Letter Box Study Group.**

## **Conclusions**

*On behalf of all its members, and reflecting their considerable expertise and enthusiasm, the LBSG has come to the view that Ofcom's proposed post box proximity rules, in conjunction with the provisions of the English Heritage/Historic Scotland/Royal Mail Joint Policy Statement, go a long way towards securing the future for Britain's letter boxes. Yet the LBSG thinks the measures can and should go further. Additional measures, in the view of the LBSG, will assist the commercial interests of Royal Mail, help it meet the terms of its Universal Service obligation, and secure the future for one of Britain's largest estates of national treasures.*

*The United Kingdom's letter boxes provide a vital day-to-day service to many millions of Royal Mail's customers. They are also loved as irreplaceable and iconic features of our communications heritage. The LBSG believes that the interests of Royal Mail, and its customers, are well served by securing the number and cherishing the character of the UK's 115,500 strong estate of letter boxes.*

*Please do not hesitate to contact me if the LBSG can be of any further assistance or you would like clarification on any of the points, and views, addressed in this submission.*

*Andrew R Young  
Chairman, LBSG*

## **About the Letter Box Study Group**

*The Letter Box Study Group is recognised as the leading authority on the history and development of the British roadside letter box. It was founded in 1976 to encourage research, preservation, restoration and awareness of letter boxes and the definitive description and documentation of their types and locations. The LBSG has developed a comprehensive system for defining and numbering British letter boxes, utilised by, among others, The British Postal Museum & Archive. The LBSG publishes *The Guide to British Letter Boxes*, and maintains a database detailing the types and locations of post boxes in the UK, the Republic of Ireland, and territories and countries worldwide which use British boxes. It has an active membership of nearly 600 and publishes a quarterly full-colour glossy magazine called *The Newsletter*. It has a photographic archive containing in excess of 100,000 images. The website of the LBSG is at [www.lbsq.org](http://www.lbsq.org).*