

## **Additional comments:**

The consultation is inadequate. It was not properly publicised. Contrary to Annex 2 of your document, no direct contact with the people most directly involved (householders) was made. Only when the Royal Mail sent a leaflet announcing the intended roll-out did people hear about it? Fortunately, this leaflet was issued shortly before the extended deadline expired. No general call for responses was properly made during July or August (when many householders are, in any case, on annual holiday). The response to the consultation will not be representative if people do not know about it. The Royal Mail should have been required to inform all households of the consultation with sufficient time for responses to be made. A full and proper consultation by Ofcom should take place before a final decision is announced. Ofcom should not rely on evidence from the survey commissioned by Royal Mail, which has an obvious interest in the outcome. There should have been a proper, independent survey in which all aspects of the proposal are considered. Royal Mail reports only the responses, it does not indicate the wording of the questions asked, nor, more importantly, is there any evidence on attitudes towards issues not included in the survey but relevant to the proposal. As things stand there has been neither an independent survey nor a full consultation.

### **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.

There should be a continuing requirement for mail to be delivered to or collected by the person to whom it is addressed. This has been a fundamental feature of the mail since its inception. Mail has always been treated as secure from the moment posted until the actual delivery and this should not change.

### **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.:**

The documentation leaves it to the discretion of the postman/woman to decide who counts as a 'neighbour'. This involves a number of problems:

1. Post may not be left with an immediate neighbour, so causing inconvenience.
2. Post may be left with people unknown or untrusted by the addressee. Not all neighbours can be relied on to act responsibly.
3. Post may be left with a child or young person rather than an adult, with less likelihood of it being safely received.

It is also highly problematic that the addressee must find a time when the 'neighbour' is at home and able to hand over the Post. There can be considerable delay in an addressee receiving their Post if the neighbour is subsequently not at home. This also undermines the notion of delivery within specific times.

Senders of mail have a legitimate expectation that Post get solely to the addressee. There should be the possibility for senders to opt out of the system by indicating this on the envelope.

Many of the above problems could be avoided if this were to be an opt-in rather than an opt-out system for householders: I.e., if those who are happy with the proposed new arrangement displayed a sticker to this effect. It should not be necessary for a householder to opt-out of such a fundamental change. The Royal Mail could deliver stickers to all households, which

could then be displayed by anyone wishing to participate in the new system.

The suggestion that the new system would obviate the problem of staff leaving packages in the delivery office and leaving a P739 is quite beside the point. If this is such a serious problem as claimed, it should be tackled at source through appropriate supervision and discipline of staff. Delivery to a neighbour should not be seen as a way of controlling delivery staff.

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

The wording should take account of the serious reservations and qualifications noted above. Specifically, there should, at a minimum, be a requirement for householder opt-in (not opt-out) and an allowance for sender opt-out (at no additional cost).