



**Consumer
Focus**
Campaigning for a fair deal

Consumer Focus report on potential impacts of stamp price increases on consumers

A supplement to the Consumer Focus response to Ofcom's consultation *Securing the Universal Postal Service: Proposals for the future framework of economic regulation*

January 2012

About Consumer Focus

Consumer Focus is the statutory consumer champion for England, Wales, Scotland and (for postal consumers) Northern Ireland.

We operate across the whole of the economy, persuading businesses, public services and policy makers to put consumers at the heart of what they do.

Consumer Focus tackles the issues that matter to consumers, and aims to give people a stronger voice. We don't just draw attention to problems – we work with consumers and with a range of organisations to champion creative solutions that make a difference to consumers' lives.

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Introduction

Purpose of paper

This report is a supplement to our *Response to Ofcom consultation in relation to Securing the Universal Postal Service: Proposals for the future framework of economic regulation*, submitted to Ofcom in December 2011.

It provides Ofcom with evidence to support the extension of a safeguard cap to all Second Class products including letters, large letters and packets. It is based on research into the responses of different groups of social consumers to price increases across a variety of mail products.

Background

Ofcom published its consultation paper on the Royal Mail price control on 20 October 2011. In the document it proposed removing price controls for all products except Second Class standard letters. These would be subject to a safeguard cap between 45p to 55p in order to ensure a basic universal service product that is accessible to all, especially the vulnerable.²

In its consultation document, Ofcom also indicated that it was open to the possibility of extending the safeguard cap to other products and asked for evidence of the use of and reliance upon various mail products by consumers, particularly vulnerable consumers.³ We therefore conducted consumer research to provide Ofcom with the evidence that it sought.

Scope of the research

Consumer Focus commissioned London Economics to undertake research to accompany our response to Ofcom's consultation on the Royal Mail price control.⁴

The research was carried out in November and December 2011.

The purpose of the research was to examine how domestic consumers might react to stamp price increases in the context of potential rises following the price review. In particular, we were interested in the extent to which consumers are likely to switch from first to Second Class mail and away from postal products altogether. The research covers stamped inland services for standard letters, large letters and packets in the UK, sent by consumers in their personal capacity (ie not including mail sent in relation to running a business).

The methodology for the research was based on two consumer surveys: an online survey with 2,020 respondents; and 212 face-to-face interviews. The main purpose of the face-to-face interviews was to target vulnerable consumers who are very low internet users (who are clearly missed by an online survey) and so respondents were only included in the face-to-face interview if they used the internet at most once a month and: a) were aged 65 or over; or b) were in socio-economic group D or E; or c) had a gross household income of £15,000 or less.

² Ofcom *Securing the Universal Postal Service: Proposals for the future framework of economic regulation*, 20 October 2011, page 7.

³ Ibid, page 68.

⁴ Ibid

The online survey included questions about mail usage and postal requirements, a choice experiment and contingent valuation⁵ questions. This paper focuses on the responses to the choice experiment as these address the main objective of the research, which is to understand the extent to which consumers are likely to switch from first to Second Class mail and away from postal products all together.

In the choice experiment, respondents were presented with a series of alternatives and asked to choose the preferred option, given the price and description of each option. The options presented for each mail format were: 'First Class', 'Second Class' and 'something else'. Respondents were also able to respond 'Don't know'. Each respondent was asked to make 12 choices using different prices and different mail formats.

The face-to-face interview questionnaire asked the same questions as the online survey, although due to interview time constraints some questions had to be omitted. The omitted questions were the contingent valuation questions and questions on the relative importance of delivery speed and price. Further, the face-to-face interview respondents were only asked to make five choices in the choice experiment (rather than 12).

The analysis of consumers' sensitivity to price changes was done in two ways:

- Firstly, the actual proportions of choices where a particular service was chosen for a range of price points were presented. In the following sections, these proportions are presented in charts titled 'Percentage of choices where...'
- Secondly, consumers' choices were modelled using a discrete choice modelling approach⁶ where the likelihood that a consumer would choose a particular service (eg First Class mail or Second Class mail) was driven by the relative prices of each service. In the following sections, all charts titled 'Predicted probability of choosing...' refer to the results from this modelling approach

Distinction between 'vulnerable consumers' and 'vulnerable and low web users'

One of the purposes of the research was to examine the response of vulnerable consumers to price increases.

The face-to-face interviews were explicitly conducted to capture the views of vulnerable consumers who were also low web users; however the online survey also captured some data on vulnerable consumers who had access to the internet.

In the following report two groups are discussed – the face-to-face interview respondents (referred to as 'vulnerable and low web users') and the online survey respondents (referred to as 'online respondents'). The 'vulnerable' respondents captured in the online survey are not discussed separately from the other online respondents, as examination of the results showed that their behaviour tracked very similarly to the other online respondents.

Indeed, it appears that what distinguishes behaviour regarding price switching in postal products is access to online alternatives, and so the face-to-face and online survey results are discussed separately to highlight the way in which access to online alternatives increases price sensitivity.

⁵ A pricing method or assessment which uses customers' responses to survey questions, ie their willingness to pay for a certain feature.

⁶ Discrete choice modelling involves giving respondents a choice between two or more discrete alternatives. The model was estimated using a conditional logit regression (where the probability of the occurrence of an event is predicted by fitting data to a logistic curve or function). For more details of the regression modelling, please refer to London Economics' original report.

It is also important to note that due to the relatively small sample size of the face-to-face interviews, the data for vulnerable and low web users we have provided should be considered indicative.

Structure of paper

The rest of this document is divided into two parts.

In the first part we present the findings of our research, beginning with the data on consumers' use of mail. We then consider the tipping point⁷ data divided into four categories of mail (standard letters, large letters weighing under 100g, large letters weighing 200g, packets). For each of these categories we present the online survey results and face-to-face survey results for vulnerable and low web users.

After we have presented these data, the final part of the document provides recommendations to Ofcom based on the research findings.

⁷ In the context of this report, a 'tipping point' is considered to be where a price point causes a noticeably large percentage of respondents to switch away from the product in question.

Key findings

Use of mail

The respondents to the surveys were personal users of mail (business users of mail were excluded). Although mail is often seen as less important for this category of users the research indicates that for both online and face-to-face respondents mail remains a vital communication tool, being the third most favoured communication tool for the online respondents and the most favoured communication tool for vulnerable and low web users (see Tables 1 and 2).

Table 1: Share using each method of communication (online survey)

Method of communication	%
Mail	78.4%
E-mail	95.9%
Mobile phone (texting)	67.0%
Mobile phone (calling)	67.6%
Telephone (landline)	80.4%

Table 2: Share using each method of communication (face-to-face interviews)

Method of communication	%
Mail	77
E-mail	2
Mobile phone (texting)	30
Mobile phone (calling)	56
Telephone (landline)	75

Table 1 also shows that while email is now the most dominant form of communication for those with access to online services, almost 80 per cent of people still use mail. Further to this, the research data has also shown that almost three-quarters of online respondents send at least one item of mail in an average month (Figure 1).

Figure 1: Volume of mail sent (online survey)

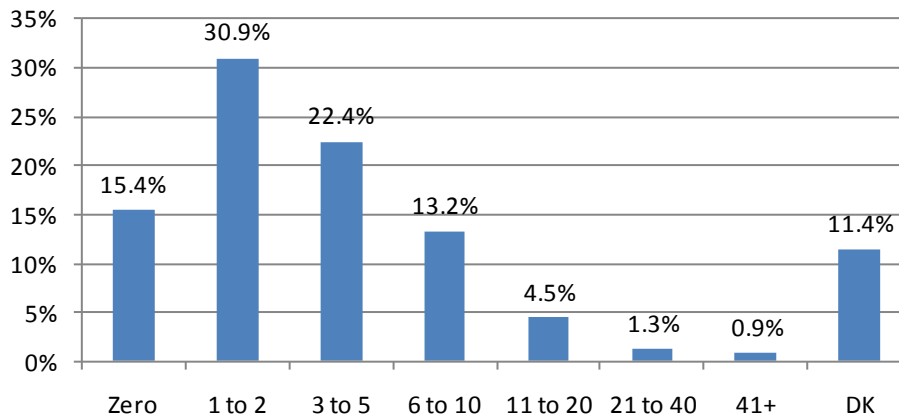
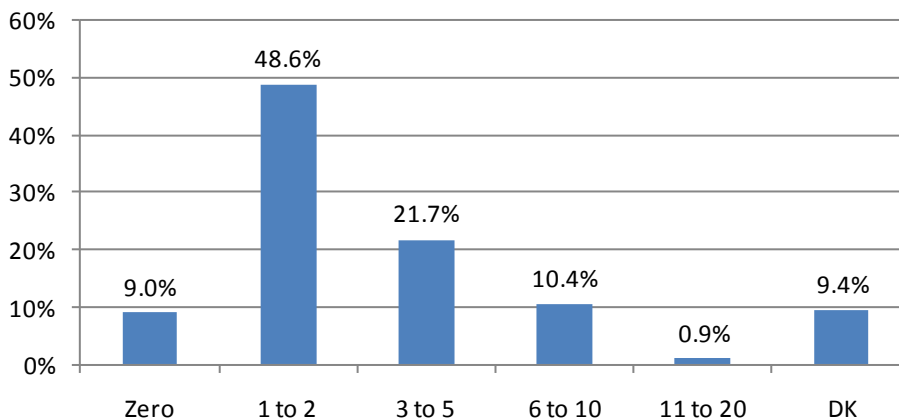


Table 2 shows that vulnerable and low web users favour the mail as a communication tool (only 2 per cent use email). The percentage of vulnerable and low web users that send no mail a month is 43 per cent lower than the online equivalent (see Figure 1 and Figure 2).

Figure 2: Volume of mail sent (face-to-face interviews)



Our research shows that mail remains a vital communication and logistics tool for all consumers, and therefore an affordable and efficient universal service which meets the needs of consumers remains vital.

Price sensitivity for standard letters

The research, shown in Tables 3 and 4 below, reveals that all consumers still overwhelmingly use the First Class service to send standard letters (online respondents – 19.5 per cent use First Class all the time versus 8.7 per cent who use Second Class all the time), (vulnerable and low web users – 28 per cent use First Class all the time versus 10 per cent who use Second Class all the time). Greater use by vulnerable and low web users of both first and Second Class products could be as a result of a lack of alternate means of both priority items and mail more generally.

Table 3: Typical sending habits (online survey)

Usual postal method used	Letters	Large letters	Packets
First Class all of the time	19.5%	10.7%	7.4%
First Class most of the time	28.5%	17.4%	10.4%
First and Second Class an equal amount	13.2%	12.3%	11.2%
Second Class most of the time	26.1%	30.3%	26.7%
Second Class all of the time	8.7%	13.3%	16.8%
Alternative service (eg Recorded or Special Delivery)	:	:	13.5%
Never send letters/large letters/packets	2.6%	13.2%	10.8%
Don't know	1.3%	2.8%	3.2%

Table 4: Typical sending habits (face-to-face interviews)

	Letters	Large letters	Packets
First Class all of the time	28%	19%	13%
First Class most of the time	22%	11%	9%
First and Second Class an equal amount	14%	7%	5%
Second Class most of the time	24%	18%	10%
Second Class all of the time	10%	19%	18%
Alternative service	:	:	11%
Never send letters/large letters/ packets	1%	23%	32%
Don't know	:	2%	2%

Online respondents

The online respondents tend to place more importance on speed for standard letters than they do for any other mail product. Nevertheless, they still value price more than speed for this mail product, as shown in Table 5 below.

Table 5: Average importance rating given to delivery speed and price

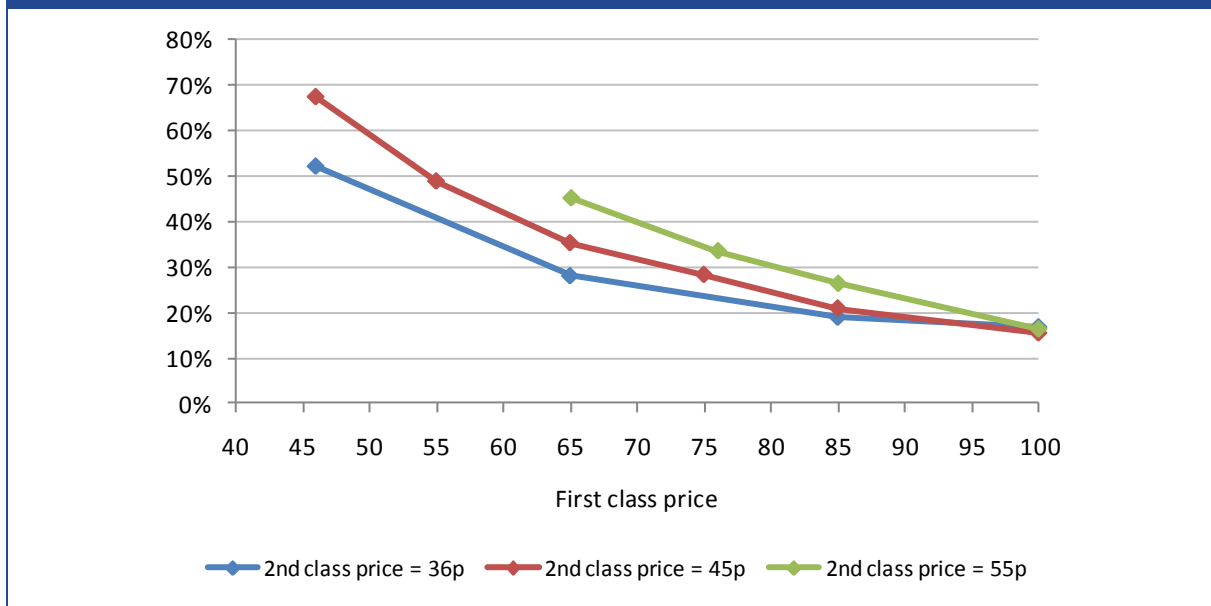
(10 = very important, 1 = Not at all important)

	Speed	Price
Letter	7.31	8.13
Large letter	6.75	8.11
Packet	6.65	8.26

Our research indicates that the size of the price gap between First and Second Class standard letters is a key determinant of consumers' willingness to switch from First Class to Second Class. As the gap between First and Second Class increases, consumers are more likely to switch away from First Class (Figure 3).

It is also worth noting that the effect of a marginal increase in the price of First Class is especially pronounced from a starting point of the current price of 46p, seen as the curves fall more steeply towards the left hand side of the chart.

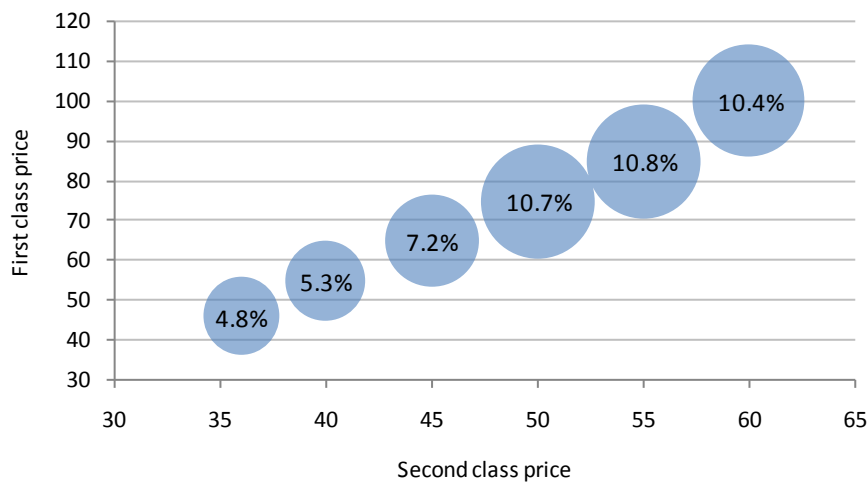
Figure 3: Percentage of choices where First Class mail was chosen (standard letter scenario)



The data shown in Figure 4 below reveals that the share choosing alternatives to both First and Second Class products increased as prices rose from 46p (First Class) and 36p (Second Class) to 75p (First Class) and 50p (Second Class), but did not continue as prices rose further to 85p (First Class) and 55p (Second Class) and £1 (First Class) and 60p (Second Class). This suggests there may be a core of consumers (around 10 per cent) who strongly prefer or will always have a need to send items using stamped mail, and who are unlikely to switch away as prices rise above the 50p/75p level (at least within the price ranges examined in this study). This is also suggested by Figure 3 above, which shows that at the higher end of the First Class price range (ie £1) there are only small differences in the shares choosing First Class for different Second Class price levels.

Figure 4 also suggests that there is a tipping point around 50p (Second Class) and 75p (First Class).

Figure 4: Percentage of choices where 'something else' was chosen (standard letter scenario)



Vulnerable and low web users

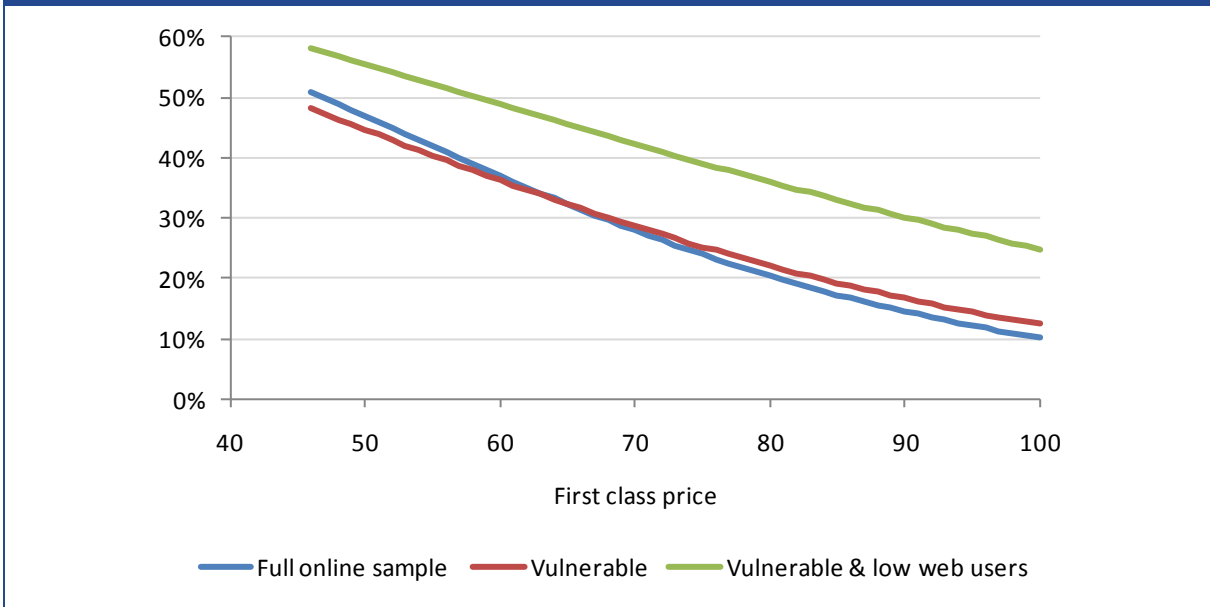
Vulnerable and low web users are more likely to use First Class regardless of the price than for the representative online sample, as shown through the higher predicted probability that a vulnerable and low web user will choose First Class.⁸ This result is surprising as it indicates that vulnerable and low web users do not automatically opt for the lower priced service.

However, the preference for First Class might be because, since they rarely use the internet, they do not have the option to send an email in circumstances where they need to send something quickly. Around three-quarters (74 per cent) of the low internet users surveyed did not have access to the internet at all, while a further fifth (19 per cent) used the internet less often than once a month.

In addition, vulnerable and low web users are predicted to decrease their usage of First Class mail more slowly as the price increases (Figure 5). Again, this might be because they lack the alternative of using email.

⁸ The predicted probabilities shown are based on a discrete choice model (estimated using a conditional logit regression), and hence refer to the predicted probabilities for the average consumer within each group (ie online respondents and vulnerable and low web users).

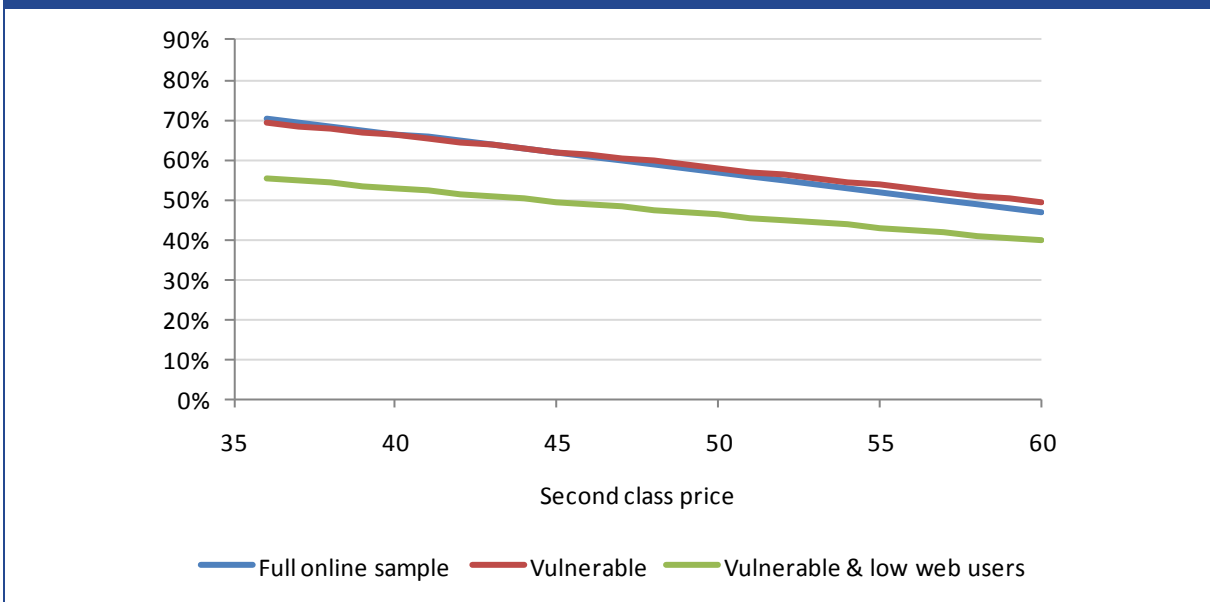
Figure 5: Predicted probability of choosing First Class mail, by sub-sample (standard letter scenario)



The probabilities in Figure 6 refer to the expected likelihood that a member of each group will use Second Class if they find themselves in the standard letter scenario.

Figure 6 shows that vulnerable and low web users who use Second Class to send standard letters are even more price insensitive than those who choose First Class, indicating that as they are unable to switch to a lower priced service, and without an online alternative, they lack choice and so are more captive to price increases.

Figure 6: Predicted probability of choosing Second Class mail, by sub-sample (standard letter scenario)



Use of large letters and packets

Consumer Focus included the large letter and packets categories in our research to capture the views of those consumers who send such items and under the proposals by Ofcom will not be protected by a price control.

Our online survey revealed that 50 per cent of respondents send at least one parcel, packet or large letter a month (Table 6) and the face-to-face interviews indicated that 22 per cent of vulnerable and low web users send at least one a month (Table 7).

Table 6: Items of post sent at least once a month (online survey)

Items	Share of respondents
Personal communications	49.4%
General correspondence	36.7%
Parcels, packets	35.0%
None of these	18.1%
Payments for bills	17.1%
Don't know	3.4%
Other	2.8%
Large letters	15.0%

Table 7: Items of post sent at least once a month (face-to-face interviews)

	Share of respondents
Personal communications	70%
Payments for bills	41%
General correspondence	20%
Large letters	8%
Parcels, packets	14%
Other	1%
None of these	13%
Don't know	1%

Online respondents' use of large letters

When sending large letters, consumers place more importance on price. This is illustrated both by the large proportion who stated that they use Second Class most or all of the time when sending large letters,⁹ and the finding that when sending large letters consumers consider price a more important factor than speed in making their choices.¹⁰ Table 8 below reveals that 59.1 per cent of senders of large letters via First Class need three quarters or more of their mail to arrive next day.

⁹ Table 3

¹⁰ Table 5

Table 8: Proportion of First Class mail that has to reach destination the next working day (online survey)

Proportion of First Class mail	Letters	Large letters	Packets
All or almost all	32.7%	29.5%	27.5%
Most (about three-quarters)	32.3%	29.6%	30.9%
About half	11.9%	13.9%	14.6%
Some (about a quarter)	8.4%	10.1%	10.1%
Very few or none	10.5%	13.5%	13.0%
Don't know	4.1%	3.4%	3.9%

Vulnerable and low web users' use of large letters

The data, shown in Table 9 below, indicates that vulnerable and low web users send half as many large letters a month as online respondents (8 per cent versus 15 per cent). However the research also reveals that of those vulnerable and low web users who do send large letters, almost 50 per cent more than online respondents use First Class all the time (10.7 per cent of online respondents use First Class all the time, 19 per cent of vulnerable and low web users use First Class all the time).¹¹

Over half of those who choose to use the First Class service to send large letters do so because they need over three quarters of their mail to arrive the day after sending (see Table 9 below).

Table 9: Proportion of First Class mail that has to reach destination the next working day (face-to-face interviews)

	Letters	Large letters	Packets
All or almost all	26%	26%	28%
Most (about three-quarters)	29%	27%	28%
About half	17%	21%	20%
Some (about a quarter)	6%	5%	8%
Very few or none	17%	16%	14%
Don't know	4%	4%	1%
Not stated	1%	1%	1%

Online respondents' use of parcels and packets

Our research indicates that over a third of online respondents send at least one packet or parcel a month.¹² They use Second Class most of the time¹³ indicating that they favour price over speed.¹⁴

Vulnerable and low web users' use of parcels and packets

Vulnerable consumers send far less packets and parcels than online respondents (14 per cent of vulnerable and low web users send at least one packet or parcel a month).¹⁵

¹¹ See Tables 3 and 4

¹² See Table 6

¹³ See Table 3

¹⁴ See Table 5

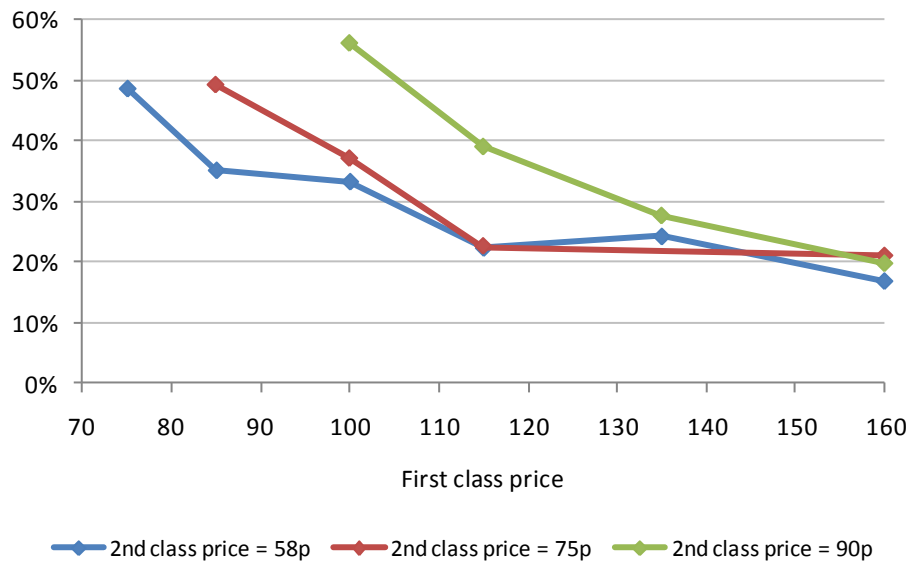
¹⁵ Table 7

Price sensitivity for large letters weighing under 100g

Online respondents

As with the research data on standard letters, the research shows that for large letters weighing under 100g there is a large switch away from First Class to Second Class as the gap between First and Second Class increases (Figure 7). This is also demonstrated by the blue curve in Figure 9.

Figure 7: Percentage of choices where First Class mail was chosen (<100g large letter scenario)



However, Figure 8 shows that a significant number of consumers switch away from using Royal Mail products entirely once the prices reach 100p (First Class) and 75p (Second Class) prices, indicating that the main tipping point seems to be between 85p (First Class) and 65p (Second Class) and 100p (First Class) and 75p (Second Class), as the share choosing 'something else' more than doubles between these two price points.

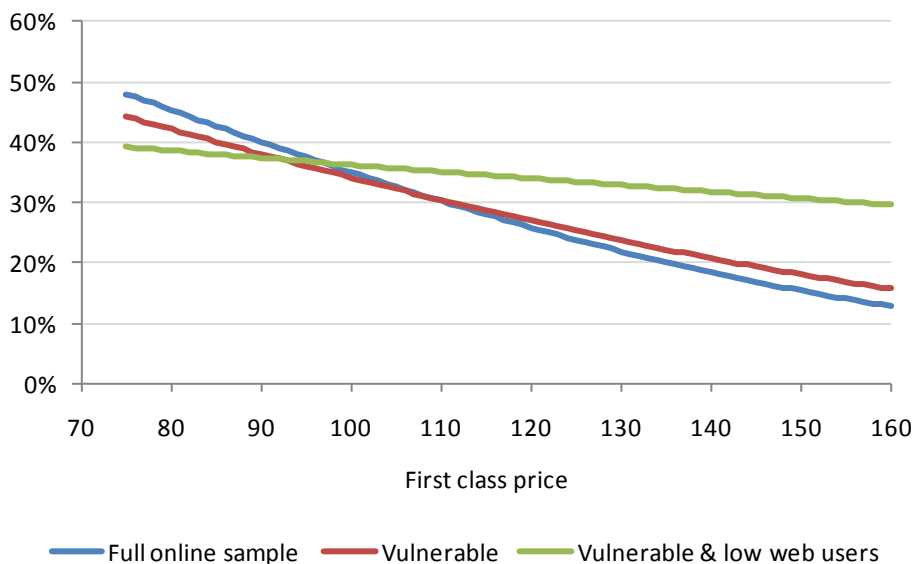
Figure 8: Percentage of choices where 'something else' was chosen (<100g large letter scenario)



Vulnerable and low web users

Although the evidence suggests that, over most of the price range examined in the study, vulnerable and low web users are more likely than online respondents to choose First Class mail, overall they are predicted to be more likely to choose Second Class over First Class regardless of the price of Second Class (demonstrated by comparing the relevant 'green' curves in Figure 9 and Figure 10). This indicates that they seem to be less price sensitive, as increases in the price have less effect on the expected likelihood that they will choose First Class mail.

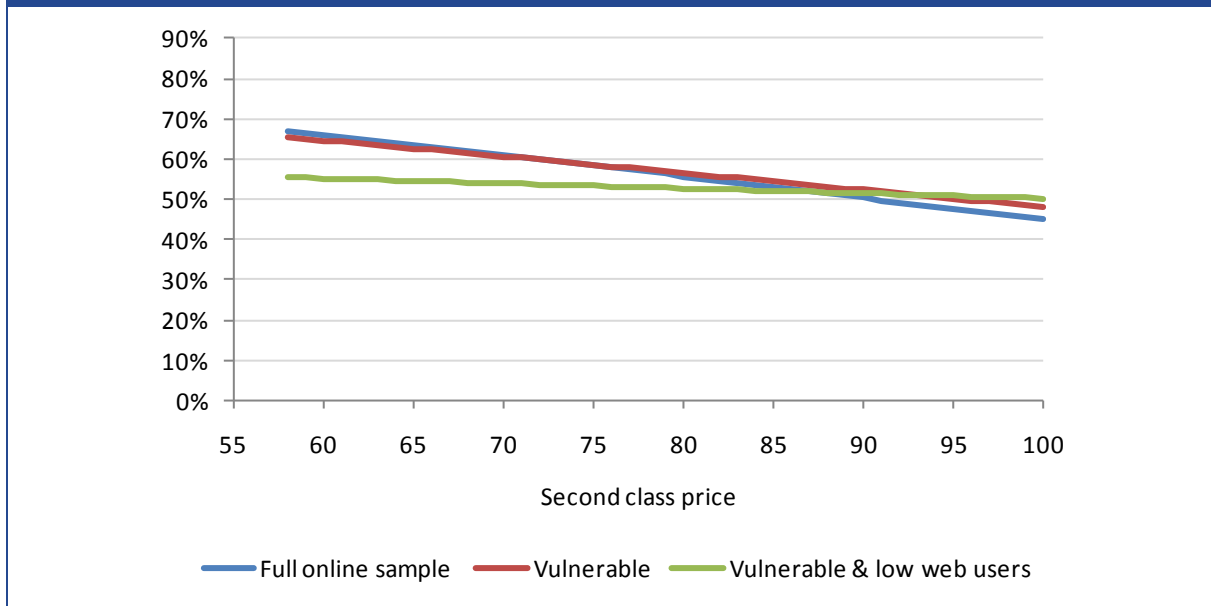
Figure 9: Predicted probability of choosing First Class mail, by sub-sample (<100g large letter scenario)



However, those vulnerable and low web users that do choose First Class are very price insensitive, indicating that those who choose First Class consider speed to be such an important attribute that they are unable to switch to a slower Second Class service.

Likewise, those who choose Second Class are very price insensitive compared to online respondents, shown in Figure 10 below.

Figure 10: Predicted probability of choosing Second Class mail, by sub-sample (<100g large letter scenario)

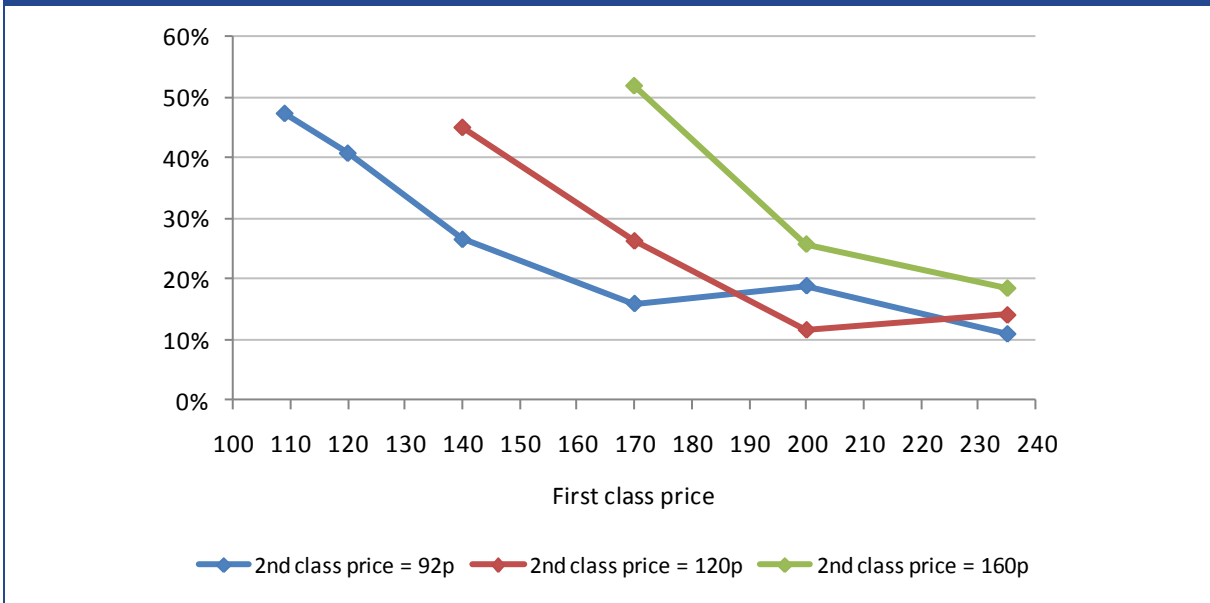


Price sensitivity for large letters weighing 200g

Online respondents

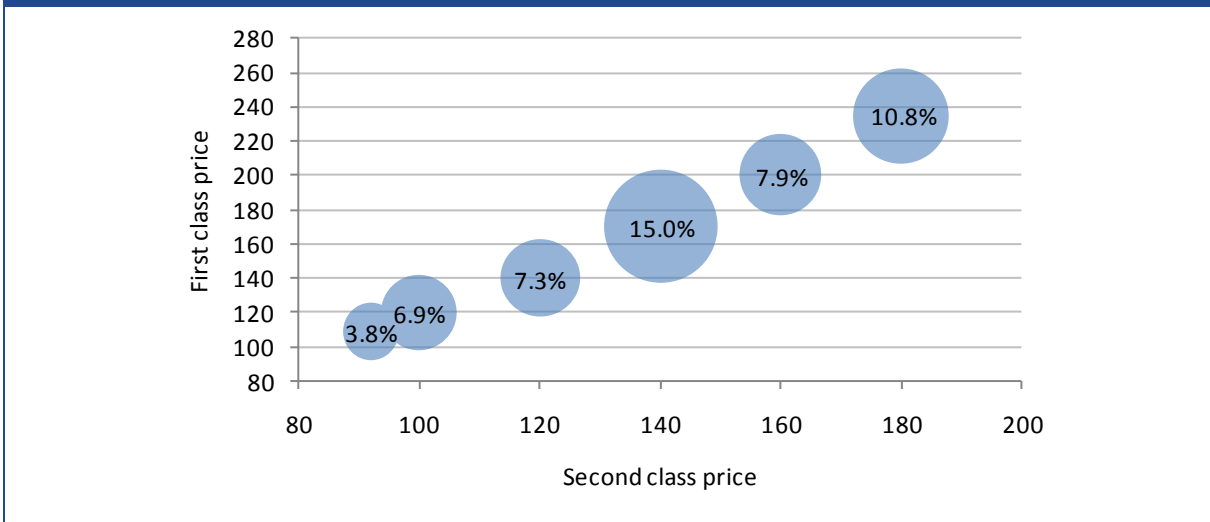
As with the research data on large letters weighing under 100g, the research shows that for large letters there is a large switch away from First Class to Second Class as the gap between First and Second Class increases (Figure 11). However, the convergence as the price of First Class increases is not as tight, indicating that while there is still a core of consumers who will use First Class regardless of the price of the service, this core is less certain and more sensitive to the price of Second Class.

Figure 11: Percentage of choices where First Class mail was chosen (200g large letter scenario)



The research also shows that a significant number of consumers switch away from using Royal Mail products entirely once the prices reach 170p (First Class) and 140p (Second Class) prices, indicating that this may be a tipping point for many (Figure 12).

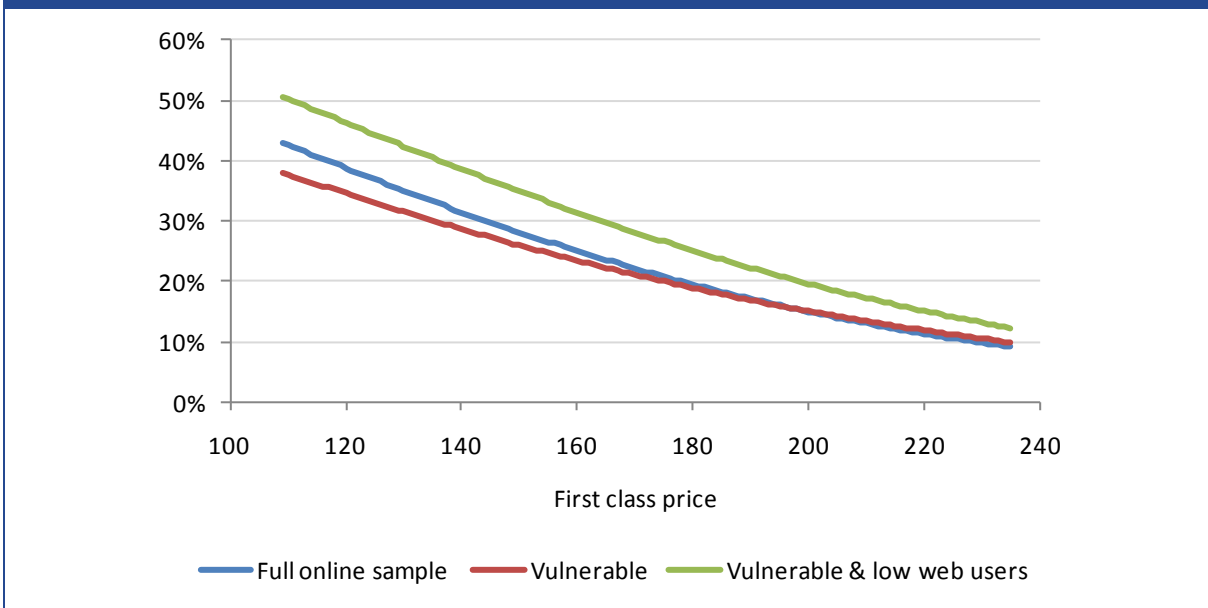
Figure 12: Percentage of choices where 'something else' was chosen (200g large letter scenario)



Vulnerable and low web users

Unlike large letters weighing under 100g, vulnerable and low web users demonstrate a greater preference than online respondents for sending large letters weighing 200g by First Class mail at low prices, however the modelling predicts that they switch away at a slightly higher rate, meaning the probabilities of the different groups have converged to some extent at higher prices (Figure 13).

Figure 13: Predicted probability of choosing First Class mail, by sub-sample (200g large letter scenario)



This indicates that they are price sensitive on First Class, however on Second Class they show much less price sensitivity (Figure 14).

Figure 14: Predicted probability of choosing Second Class mail, by sub-sample (200g large letter scenario)

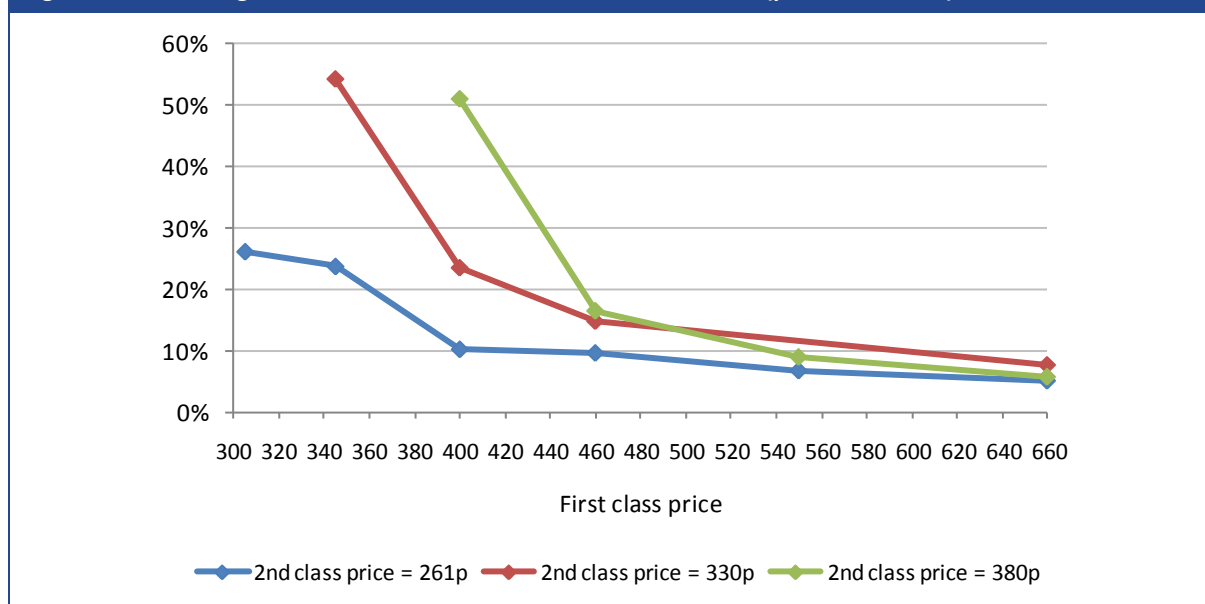


Price sensitivity for packets

Online respondents

The majority of online respondents indicated that they consider price to be a more important factor than speed when sending packets;¹⁶ it follows that they would be much more price sensitive. This assumption is born out in our data for packets and demonstrated in Figure 15, showing that price sensitivity is demonstrated up to 460p for First Class Stamps (with respondents switching away to a cheaper Second Class service up to that point).

Figure 15: Percentage of choices where First Class mail was chosen (packet scenario)



Online respondents show a great willingness to switch away from packets entirely when prices for both First and Second Class increase. 42 per cent choose 'something else' at prices of 660p (First Class) and 500p (Second Class) for packets (Figure 16).

¹⁶ See Table 3 and Table 5.

Figure 16: Percentage of choices where 'something else' was chosen (packet scenario)

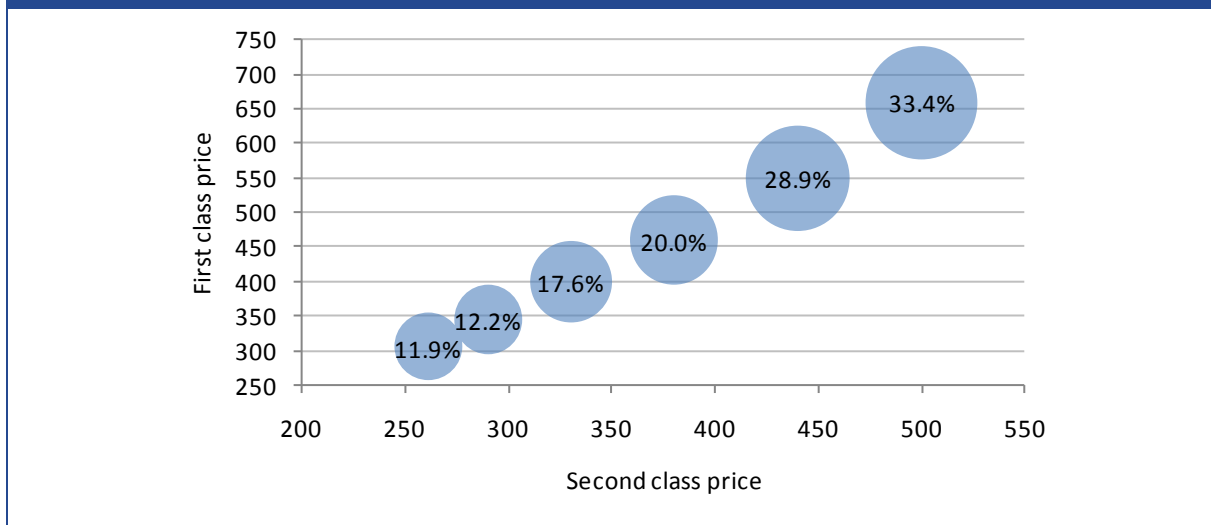


Figure 16 also suggests that there may be a tipping-point around the 380p (Second Class) and 460p (First Class) price combination, which sees subsequent increases resulting in far greater switching.

Vulnerable and low web users

The data has shown that vulnerable and low web users send far fewer packets than the online respondents.¹⁷

However, while they send less, the analysis suggests that vulnerable and low web users are far less price sensitive than consumers in general and the research indicates that they may value the speed of the service over price. This is shown in the predicted probability that vulnerable and low web users will choose First Class to send a packet being higher than for the representative online sample (Figure 17), and the probability that a vulnerable low internet user would choose Second Class being lower than for the representative online sample (Figure 18).

¹⁷ Table 7

Figure 17: Predicted probability of choosing First Class mail, by sub-sample (packet scenario)

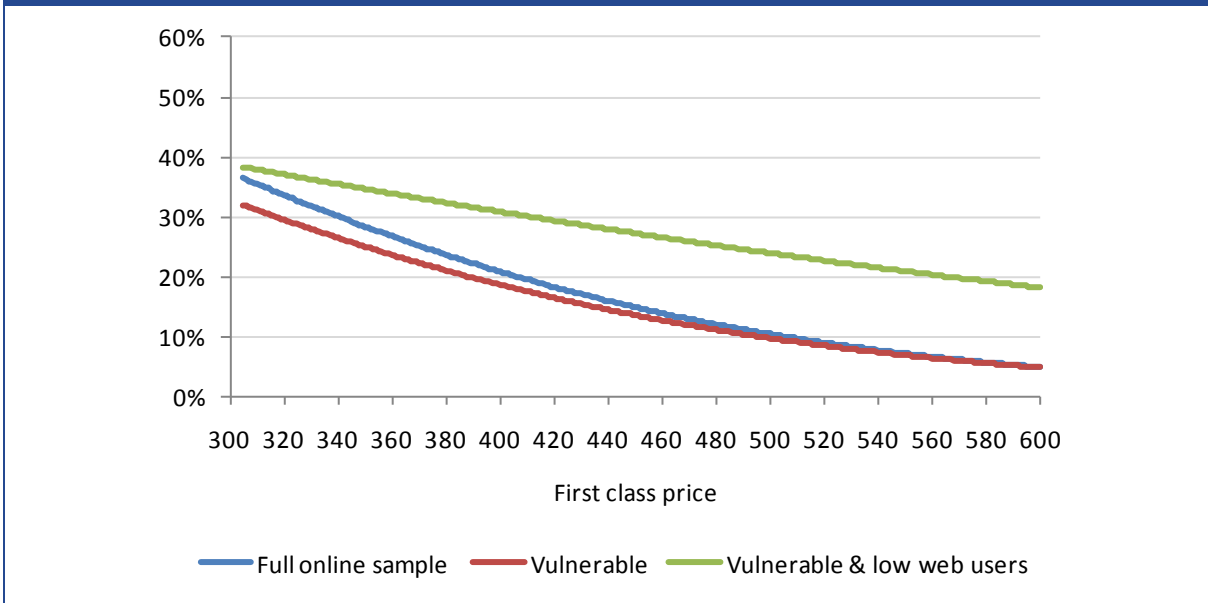


Figure 18: Predicted probability of choosing Second Class mail, by sub-sample (packet scenario)

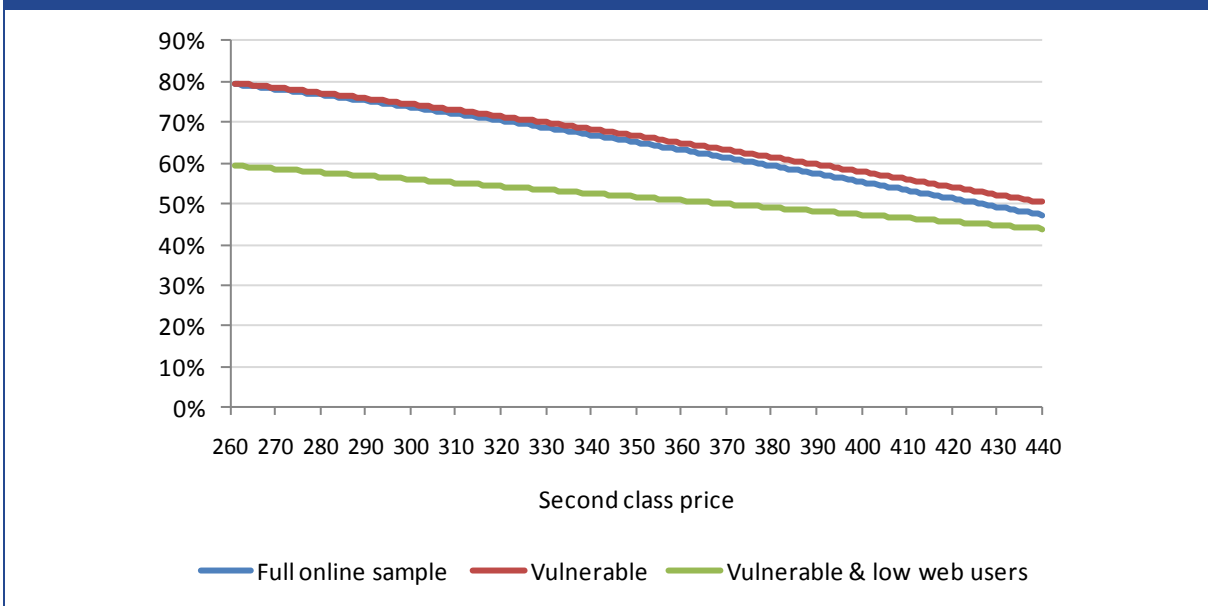


Figure 17 also shows that vulnerable and low web users are also predicted to reduce their usage of First Class mail at a slower rate as price increases. This follows the previous argument that vulnerable and low web users value speed over price, but it also indicates that they are less able or willing to switch to alternative providers of packet delivery services as those who choose Second Class show a similar lack of price sensitivity, demonstrated by Figure 18.

Conclusions and recommendations

Consumers with access to online services value price in their choice of mail products

Our research shows that consumers with access to online services are on average much more price sensitive, and are more likely to abandon Royal Mail services entirely when prices reach a certain point. This can be seen across in all mail products, but is much more pronounced with packets.

This indicates that care needs to be taken when setting prices to avoid a switch away from First Class services or from its mail products entirely. Consumers depend on mail for economic and social reasons and price should not become a barrier for them to continue to use it in this way. It is also worth noting that consumers moving away from mail products will ultimately impact upon the sustainability of the Universal Service.

Vulnerable consumers who are low web users are more likely to be captive to high prices

The research shows that while those with access to online services are price sensitive, those who are low internet users do not demonstrate similar price sensitivity.

Vulnerable and low web users generally maintain a steady use of mail products even when prices rise to the upper limit of the price scale, which may indicate that the lack of online alternatives leaves them with no choice but to rely upon the mail service. As a consequence, they are more likely to be affected by significant price rises.

Extension of the Second Class safeguard cap to large letters and packets

We note that Ofcom is already proposing a Safeguard Cap for Second Class standard letters at between 45p to 55p. However our research has indicated that a safeguard cap is required for all Second Class products.

Vulnerable and low web users have been shown to be relatively price insensitive across mail products when compared with consumers who have access to online alternatives, and as a consequence are less likely to choose an alternative to the higher prices offered.

A safeguard cap is required to ensure that vulnerable and low web users are not left to bear the brunt of price increases, particularly as our research shows that consumers with online alternatives are much more likely to switch away from mail entirely as prices increase. This could lead to vulnerable low web users being faced with even higher prices to sustain the Universal Service in the face of these lost volumes.

As for the specifics of where a Second Class safeguard cap could be set, the research has indicated tipping points for each of the non-price controlled products analysed (large letters weighing under 100g, large letters weighing 200g, packets).

This may provide useful information for Ofcom when considering setting a price cap, alongside their obligation under the Postal Services Act 2011 to enable Royal Mail to make a 'reasonable profit' on the product.

Large letters weighing under 100g

Our data from online respondents¹⁸ suggests 75p as a possible tipping point on Second Class large letters weighing under 100g.

Large letters weighing 200g

Our data from online respondents¹⁹ suggests 140p as a possible tipping point on Second Class large letters weighing 200g.

Packets

Our data from online respondents²⁰ suggests 500p as a possible tipping point on Second Class packets.

Non-removal of price caps for all First Class products

Under the price control proposals Ofcom would remove price caps for all First Class products.

However, our research indicates that First Class mail is still considered a vital service by many consumers, probably because they value the speed of a First Class service, and so we would urge Ofcom to reconsider the removal of the price caps.

In particular, the data shows that consumers demonstrate significant lack of price sensitivity for First Class large letters weighing under 100g and packets which indicates that vulnerable and low web users are less able to switch from these services. Ofcom might like to consider further research into why vulnerable and low web users appear to place particular importance on First Class products for these categories.

Value for money versus affordability

Under the Postal Services Act 2011 Ofcom has a duty to ensure that Universal Service product prices are affordable. Postcomm's recent affordability study²¹ has shown that the affordability of stamps is currently not an issue for any consumers; therefore the tipping point data that we have presented in this report indicates the point at which consumers no longer consider this service to be value for money and switch to alternative methods. This is likely to be of commercial interest to Royal Mail and to Ofcom when considering the impact of price rises on mail volumes and therefore ultimately the viability of the USO.

However, the price insensitivity of vulnerable consumers should be of concern to Ofcom as it reveals that those without an online alternative are less likely to switch away as prices increase. We recommend that Ofcom conducts further research and a proper impact assessment to understand better the consequences of their proposals upon the 'vulnerable and low web users' group of consumers.

We also urge Ofcom to monitor the impact of any price rises (whether regulated or not) to ensure that affordability does not become an issue.

¹⁸ Figure 8

¹⁹ Figure 12

²⁰ Figure 16

²¹ Page ii, 'Universal service - Discussion paper on affordability,' Postcomm, February 2011



**Consumer Focus report on potential impacts of stamp price increases on consumers
– A supplement to the Consumer Focus response to Ofcom’s consultation ‘Securing
the Universal Postal Service: Proposals for the future framework of economic
regulation’**

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