



REVIEW OF THE REGULATION OF ROYAL MAIL

– Ofcom Consultation, 25th May 2016

Response from Secured Mail

The comments made in this response may be published and attributed to Secured Mail.

1. Summary:

- 1.1 Secured Mail (SM) is an active competitor to Royal Mail (RM), and other operators, and believes the extent of competition that has developed so far has brought important benefits to customers as well as encouraging RM's efforts to improve efficiency and services.
- 1.2 In responding to Ofcom's earlier Discussion Document (July 2015) on a fundamental review of the regulation of RM, SM strongly supported the need for a far-reaching review and suggested a number of regulatory changes we saw as necessary, appropriate and proportional given the state of competition in the postal market and RM's provision of the Universal Service.
- 1.3 SM agreed with Ofcom statements in the Discussion Document that:
 - RM's pricing behaviour since 2012 indicated the existing regulatory regime was not working as intended;
 - Ofcom's proposals in its December 2014 consultation on Access pricing were dependent on the existence of significant EtE competition and there was no current prospect of such competition at sufficient scale to exercise the necessary constraint on RM behaviour or provide the necessary incentives for RM efficiency improvement;
 - RM was in a stronger financial position than in 2012 and universal service provision was not under any potential threat from competition (to an even lesser extent than when Ofcom made that conclusion in 2014, before Whistl's withdrawal from EtE competition).
- 1.4 We also concurred with Ofcom that it needed to address the concerns raised by many respondents to the December 2014 consultation (on Access Pricing regulation), regarding RM's pricing and non-pricing behaviour.
- 1.5 SM is concerned that Ofcom has not concluded that changes to the existing regulatory regime are needed. In our view, Ofcom's stance has been to 'enable competition' rather than 'promote competition'. Given Ofcom's duty under the Communications Act 2003 (to "further the interests of consumers in relevant markets, where appropriate by promoting competition"), we believe Ofcom needs to be more pro-active in establishing a regulatory regime for RM that does promote competition

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2. Response to Ofcom Questions:

Question 1: Do you agree that the evidence summarised in Section 4 and set out in more detail in the annexes to this consultation does not support the imposition of (i) further price controls on parts of Royal Mail's business or (ii) efficiency targets? Please state your reasons and provide evidence to support your view.

- 2.1 In responding the Discussion Document, SM said its firm opinion was that the existing regulatory regime:
- does not provide sufficient incentive for RM to improve efficiency;
 - does not adequately constrain RM's pricing and non-pricing behaviour or RM's market power
 - does not ensure RM's terms are fair and reasonable;
 - does not sufficiently enable the development of effective competition;
 - does not give sufficient encouragement for RM to offer high quality services.
- 3.4 We do not see sufficient evidence that the current regulatory structure has acted to ensure that RM has behaved in a way that has benefitted the UK postal users. Instead, RM has implemented large annual price increases that have suppressed the use of mail, while factors such as competition from other postal operators and within the wider communications market more generally have constrained RM's pricing and non-pricing behaviour to only a small extent.
- 3.5 In its response, SM argued that Ofcom should, in the interests of customers, the mail sector and the USO, apply additional regulatory constraints on RM, relating to both pricing and non-pricing behaviour, and applying to both Retail and Access.
- 3.6 SM also said that, in our view, there were existing incentives on RM to deliver efficiency improvements to only a small extent. Without effective direct (E2E) postal competition and given RM's efficiency improvement, we strongly believed Ofcom should introduce some form of regulatory requirement for efficiency improvement. As we have not seen any change in the effect of the existing regulatory regime on RM's pricing and non-pricing behaviour, we continue firmly to believe that some form of regulatory control on both RM's pricing and efficiency is needed.
- 3.7 In this Consultation, Ofcom has concluded that RM is now and will continue to achieve the measure used by Ofcom to judge the financial sustainability of RM and hence provision of the USO is not threatened.
- 3.8 Ofcom has carried out a thorough analysis of RM's efficiency and has concluded that although efficiency has improved and RM's Business Plan represents further improvement, RM could improve efficiency by more than it plans to

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- 3.9 In that circumstance, SM believes it is wrong for Ofcom to see the existing regulatory framework as appropriately incentivising RM to pursue efficiency improvement.
- 3.10 If RM has the potential to achieve better efficiency improvement, the regulatory regime should require that improvement to be made; if not, postal consumers are denied the benefits available. It seems clear to SM that Ofcom should introduce new regulatory measures that will require RM to achieve the potential efficiency gains.
- 3.11 Ofcom has also analysed the postal markets for letters and parcels. In the Letters market, Ofcom concludes that *“Royal Mail remains a near monopolist facing relatively limited competitive constraints in relation to both single piece and bulk letters and large letters”* and *“we consider the constraints on Royal Mail in letters and large letters are weaker than they were in 2012”*
- 3.12 In the bulk letters market Ofcom says it does not *“consider that there are significant competitive constraints on Royal Mail’s pricing of bulk letter mail overall”, with RM “likely to be able to unilaterally and profitably raise prices for transactional mail, that there are limited competitive constraints on its pricing behaviour in publishing mail, and that while there may be greater constraints in relation to advertising mail, it is not clear that Royal Mail is effectively constrained.”*
- 3.13 SM believes it is clear that the letters market does not to in itself provide sufficient constraints on RM’s pricing.
- 3.14 Ofcom notes that RM has increased access letter prices on average above RPI since 2012, with prices for transactional mail increasing by more than RPI and those for advertising mail increasing by around RPI. Also that *“Using RPI rather than CPI [the official measure of inflation] would tend to understate the real terms (i.e. adjusted for inflation) price increase.”*
- 3.15 When it set the current regulatory regime in March 2012, Ofcom was aware of the potential at that time for development of large-scale EtE competition. In this consultation, Ofcom is clear that the absence of such competition means *“Royal Mail may have weakened incentives to deliver efficiency improvements and an increased ability to charge excessive prices.”*
- 3.16 However, despite believing that absence of EtE competition weakens any incentives for RM to improve efficiency and increases its ability to charge excessive prices, Ofcom does not see any reason to propose regulatory changes to encourage RM to improve efficiency as it has the potential to, or to constrain RM’s pricing freedom.
- 3.17 SM believes that position does not provide sufficient confidence to mail users that they will not face further significant, real terms price increases.
- 3.18 Ofcom’s conclusions on efficiency and price control mean it is not proposing to introduce either





- a requirement for RM to achieve the efficiency improvements it could achieve, or
- a safeguard price control mechanism that would recognise the absence of market constraints and replace reliance on whatever factors have anyway resulted in above inflation increases.

- 3.19 As Ofcom's primary statutory duty under PSA 2011 (financially sustainable provision of the USO) has been achieved and is not at risk of being failed, SM believes that Ofcom should therefore now give prominence to its duty under CA 2003 to "further the interests of consumers in relevant markets, where appropriate by promoting competition".
- 3.20 In our view, some form of pricing control and/or efficiency targetry is needed to benefit consumers directly and indirectly by ensuring better pricing and efficiency.
- 3.21 SM therefore does not agree that the evidence provided by Ofcom does not support the imposition of (i) further price controls on parts of Royal Mail's business or (ii) efficiency targets.

Question 2: Do you agree that the regulatory framework should remain in place until March 2022 following the anticipated completion of Ofcom's review by the end of 2016-17? Please state your reasons and provide evidence to support your view.

- 3.22 SM does not agree that the current regulatory framework should remain in place until 2022.
- 3.23 When it set the regulatory framework in 2012 for seven years, Ofcom saw that as providing *"an appropriate degree of certainty as to the regulatory framework for Royal Mail, potential investors and other stakeholders. We considered that this would better encourage efficiency incentives and allow the benefits of a financially sustainable universal service to be shared with customers."*
- 3.24 In our view, the framework has not provided the intended efficiency incentives and the benefits of a financially sustainable universal service have not been shared with customers. Instead, RM is not planning to make the efficiency improvements that it can and customers have suffered above inflation price increases, while RM has achieved the 5%-10% EBIT range.
- 3.25 Last year, Ofcom decided a Fundamental Review of Royal Mail Regulation was needed, because of RM's improved financial position, major changes in the market (with no realistic potential for large-scale EtE competition) and concerns about RM's pricing and non-pricing behaviour. Now, despite those several factors justifying a fundamental review, Ofcom does not propose any major changes to the current regulatory regime and, in particular, does not propose to introduce efficiency targetry or price constraints.

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- 3.26 SM is disappointed that despite the significant changes Ofcom saw as important enough to require a fundamental review and the concerns of customers and competitors, Ofcom has not proposed any major changes to the regulatory regime.
- 3.27 We cannot then support Ofcom's proposal to retain the 2012 regulatory regime essentially unchanged until 2022.
- 3.28 Given that RM's financial performance is now within the 5%-10% EBIT range which Ofcom considers is appropriate and the rate at which EBIT has improved since 2010/11, it is possible that RM's EBIT will reach or exceed 10% by 2021/22, the end of the period Ofcom proposes.
- 3.29 Ofcom has said that will continue its on-going monitoring of the postal market and RM's performance, and that it retains discretion to review the regulatory regime at any time if it believes there is need to do so.
- 3.30 If Ofcom does decide to extend the 2012 regime to 2022, SM believes Ofcom must be clear that it will review the regime before 2022 if any of the factors which it believes currently justify no major changes should change, i.e. if:
- RM's EBIT increases significantly above the current level
 - RM continues to achieve efficiency improvements that are below the level possible
 - RM continues to increase prices above the level of inflation (using the official CPI measure)
 - customer satisfaction does not continue to increase

Question 3: Do you agree that the analysis summarised in Section 4 and set out in more detail in the annexes to this consultation accurately reflects the UK postal market? Please state your reasons and provide evidence to support your view.

- 3.31 SM believes Ofcom's review and analysis is a good reflection of the UK market for letters and parcels.
- 3.32 We note that Ofcom says RM's delivery operation is now less flexible than it was, largely as a result of RM's decision to deliver more parcels through its foot network, and we believe this shows RM using its dominance in the letter market (and its USO network) to leverage market power in the low weight and 'letterboxable' parcels market, against the interests of letter mail users by reducing its efficiency improvement.
- 3.33 Ofcom also says that the agreement RM made with the CWU in 2014 limited RM's flexibility in various ways, such as putting constraints on part-time working, contracts and redundancies. SM believes that agreement also prevents sub-contracting or franchising of collection and delivery, which has further reduced RM's operational flexibility and ability to improve efficiency. We believe Ofcom should view negatively

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any agreement by RM to continue these constraints, as they will show RM continues to limit its ability to achieve possible efficiency improvements and reduce the cost of USO provision.

- 3.34 As Ofcom does not propose to introduce any efficiency targetry for RM and to continue this regulatory regime until 2022, SM believes that if RM continues to restrict its ability to increase efficiency through settlements with the CWU, Ofcom should consider that to be grounds to review the regulatory regime and introduce efficiency targetry.
- 3.35 SM notes Ofcom concludes:
- RM remains a near-monopolist in letters;
 - RM is subject to weaker constraints than in 2012;
 - RM has a dominant volume share (60-80%) in the single piece parcels market;
 - RM has a similar dominant volume and revenue share (60-80%) of bulk parcels below 2kg; and
 - RM continues to have a market advantage for small, lightweight bulk parcels (particularly those less than 1kg, specifically for parcels that can fit through the letterbox).
- 3.36 However, while Ofcom states “*the maintenance of a competitive market for parcels should be the key objective for a regulatory framework for the parcels sector*”, it does not propose to introduce any regulations to pursue that key objective.
- 3.37 It is clear to SM, from what Ofcom says, that in the parcels market RM has weakened its efficiency in delivery (including for USO provision) in order to use its dominance in the letter market (and its USO network) to leverage market power in the low weight/‘letterboxable’ parcels market and that maintaining a competitive parcels market is a key regulatory objective, yet RM is under no regulatory requirement to allow Access operators to utilise the delivery network RM itself uses to exploit market power to the detriment of consumers.
- 3.38 SM strongly believes this means that Ofcom should now introduce new regulations for lightweight parcels to promote competition to the benefit of consumers, in particular to require RM to offer Access services that are equivalent to RM’s Retail services in this market.

Question 4: Do you agree with our proposal not to amend the Universal Service Order or the DUSP conditions to include tracking as standard on First and Second Class single piece parcels? Please state your reasons and provide evidence to support your view.

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3.39 Ofcom has concluded that:

- Competitors to RM offer tracking of parcels as standard as a means to counter the 20% VAT advantage enjoyed by RM on USO services
- It is not clear that those consumers who rely most on USO services require tracking to be provided as part of the universal service obligation
- RM already offers tracked parcel services outside the USO
- the VAT exemption on universal services means that allowing tracked parcels within the universal service would have a negative impact on the development of parcels competition

SM believes those are correct conclusions and agrees with this proposal.

Question 5: Do you agree with our proposal to retain the safeguard cap in its current form? Please state your reasons and provide evidence to support your view.

- 3.40 SM agrees with this proposal, as we believe that the factors which led Ofcom to introduce the safeguard cap in 2012 continue to apply (competition is not sufficiently present in this part of the market to constrain RM's pricing behaviour and RM continues to benefit from the VAT exemption).
- 3.41 SM notes Ofcom's belief that by using foot-delivery for small/lightweight parcels (and so subsidising parcels prices from letters revenues or judicious cost allocation between letters and parcels), RM is enable it to leverage its market power in letters into parcels, for example.
- 3.42 Ofcom says it will consider, as part of a forthcoming review of regulatory accounting Conditions, how it can better ensure appropriate cost allocation and build a costing model.
- 3.43 SM is disappointed that, after 4 years of being the postal regulator, Ofcom has not already established the necessary regulatory accounting and costing model. It seems clear to the market that RM is already using its market power in letters for unfair advantage in small/lightweight parcels and doing so in a way that reduces its ability to achieve possible efficiency improvements. Ofcom is now saying only that it will consider such changes and building a costing model, as part of a review for which it has set no date.

Question 6: Do you agree that we should amend the USPA Condition so that it is clear that access operators cannot be required to accept general terms and conditions that include shorter notification periods than those provided for under USPA 7?

- 3.44 Ofcom has concluded, from information provided by SM and many others, that RM has sought to establish

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“a situation where the requirements of the notification condition may not apply to certain key access services... Although it is possible for operators to function in the access market without using these services, the need to compete with other operators who do use these services may mean operators have little option but to accept the schedules proposal

Hence, Ofcom is

“concerned that this could undermine the regulatory protection which is intended to be offered under USPA 7.3 and 7.4, particularly where the access operators have no real choice but to agree to that or not to take the relevant D+2 Access product”.

- 3.45 SM strongly supports the proposal that the existing regulatory Condition should be changed to make it clear that access operators cannot be required to accept terms and conditions with shorter notification periods than those allowed by the Condition.
- 3.46 However, SM firmly disagrees with Ofcom’s conclusions in other parts of Section 6 (on the Access Framework).
- 3.47 Ofcom considers it is right for RM to continue to have freedom to changes its access and retail products, including making changes, because *“We would expect that Royal Mail would take account of the needs of its customers when implementing price changes, which we believe is also in its own best interests”.*
- 3.48 In SM’s experience, RM does not take account of the needs of its customers. A clear example is that in 2015 it changed the timing of its Access price increases from April to January, without any consultation and leaving customers having to manage two price increases within one 12-month budgetary period (both above the rate of inflation).
- 3.49 Ofcom also believes *“there is evidence that Royal Mail has undertaken a genuine consultation process with its customers”.* For example in January 2015 Royal Mail consulted on changing or removing certain contractual features including a number of procedural protections, such as the suspension clause. Subsequently, some of these proposals were altered or dropped with Royal Mail citing strong customer feedback in relation to the proposed changes”.
- 3.50 SM believes RM’s approach in consultations is to make various proposals, all unacceptable, before withdrawing some but going ahead with others. In the January 2015 contract change proposals which Ofcom mentions, RM went ahead with a number of changes to which customers had commonly objected, but did not to proceed with a proposal to adjust the tolerances for Access Price Plans, which did have general customer support.
- 3.51 SM strongly disagrees with Ofcom proposal not to provide guidance on the requirement that RM’s Access terms be “fair and reasonable” despite SM (and several others) saying that this requirement is too imprecise and lacks clarity on what is

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required – and despite Ofcom itself saying in 2012 that *“it may be appropriate to provide guidance once the regulatory framework had time to become established”*. However, Ofcom does not propose to provide the guidance stakeholders seek and it said may be appropriate. In our view, a guidance document would make a useful contribution to the functioning of the access market.

- 3.52 In responding to the earlier discussion document, perhaps the key need raised by SM was for proper equivalence between RM's Access and Retail services, both in the range of services available and the operational requirements to use them. It is clear from the Consultation many other stakeholders had the same concerns.
- 3.53 Ofcom has recognised there are important issues here, with RM not being responsive enough to customers' needs and not facing enough incentives to process requests for new services swiftly. As a result, Ofcom proposes that RM must respond to a request for a new Access service within 6 weeks if there is an existing Retail service. SM strongly supports that proposal.
- 3.54 However, we believe Ofcom needs to go further and require RM to offer an Access service for each Retail bulk mail contract service.
- 3.55 Also, we believe Ofcom needs to make it clear to RM that it must show any operational non-equivalence between an Access service and the corresponding Retail service is “fair and reasonable”, rather than Access customers having to show the non-equivalence is unfair or unreasonable.
- 3.56 In responding to the Discussion Document, SM explained why it believed competition must also be able to develop in other services, which required the scope of the Access conditions to be extended beyond the current limits (D+2 Letters & Large Letters at IMCs); we see that several other stakeholders made the same point.
- 3.57 SM is disappointed that Ofcom has not taken the opportunity of this review to recognise the needs of customers and pro-actively to assess how the existing Access remit could be extended in ways that would benefit customers and promote competition.
- 3.58 We believe that Ofcom must, at the least, implement a change to the Access conditions so that RM must continue to provide all existing Access services, unless they are replaced with comparable services and with the agreement of Access contract holders.

Question 7: Do you agree with our proposal to amend the scope of Essential Condition 1 to cover untracked letter and large letter mail, and single piece universal service parcels, and to remove the remaining universal service products from the scope of Essential Condition 1?

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3.59 SM agrees with this proposal, which means that Access mail and most parcels will remain outside the scope of the Essential Condition.

Question 8: Do you agree with the proposed streamlining revisions to Essential Condition 1, including the removal of the Mail Integrity Code of Practice, as drafted in Annex 12?

3.60 SM takes very seriously its responsibility to customers to protect the integrity of their mail. We agree with Ofcom that it is not necessary to continue the formal obligation of the Mail Integrity Code of Practice, but we follow, and will continue to follow, its principles.

Question 9: Do you agree that the proposed drafting of Essential Condition 1 including relevant definitions accurately capture our intended objectives and the intended operators and mail types?

3.61 SM agrees with the proposed revisions to Essential Condition 1 and that the proposed drafting accurately captures the intended objectives.

Question 10: Do you agree with the proposed revisions to Consumer Protection 2, including the removal of the PCOP code and agreement, as drafted in Annex 13?

Question 11: Do you agree that the proposed drafting of CP 2 including relevant definitions accurately capture our intended objectives and the intended operators and mail types?

3.62 SM agrees with this proposal and the proposed drafting.

3.63 SM does have arrangements in place so that any mail it receives which should be with another operator is swiftly returned to that operator, so we support the Ofcom view that a 'principle based' approach for CP2 is appropriate, where operators and the industry generally are able make practical arrangements for the return of mail that has wrongly come into an operators network.

3.64 We also agree with Ofcom that the revised CP2 should

- apply to untracked Letters and Large Letters (the type of post most likely to enter the wrong operator's network)
- should apply to RM as the most likely recipient of mail intended for other operators
- place on RM an obligation to have effective arrangements with other operators for the return of such mail on fair and reasonable (i.e. cost-recovery only) terms.

Question 12: Do you agree with our proposal to amend the scope of Consumer Protection Condition 3 so that it retains a minimum requirement for all postal operators, and that additional requirements in relation to redress and reporting would apply to Royal Mail as the universal service provider only?

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Question 13: Do you agree with our proposed drafting of Consumer Protection Condition 3 given our proposal to only apply the additional requirements set out in CP 3.3 in relation to redress and reporting to Royal Mail as the universal service provider?

3.65 SM agrees with this proposal and the proposed drafting.

3.66 We agree with Ofcom that the commercial contracts which final-delivery operators (other than RM) have with their customers provide the protections those customers require, but RM (as the provider of the USO and delivering the mail of individual consumers) should continue to be subject to this Condition

Question 14: Do you agree with our proposal to revoke Consumer Protection Condition 5?

3.67 SM agrees with this proposal.

Question 15: Do you agree with our proposal to remove the one-month notification period for price decreases to Royal Mail's universal service products and services?

Question 16: Do you agree with our proposal to reduce the advance notice period for specified collection times to one month (reduced from three months)?

Question 17: Do you agree with our proposal to remove the advance notice period for latest delivery times (currently at three months)?

Question 18: Do you agree with our proposed restructuring and drafting of Designated Universal Service Provider Conditions 1.10.1 and 1.10.2, and the removal of Designated Universal Service Provider Conditions 1.10.3?

SM does not disagree with these proposals.

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