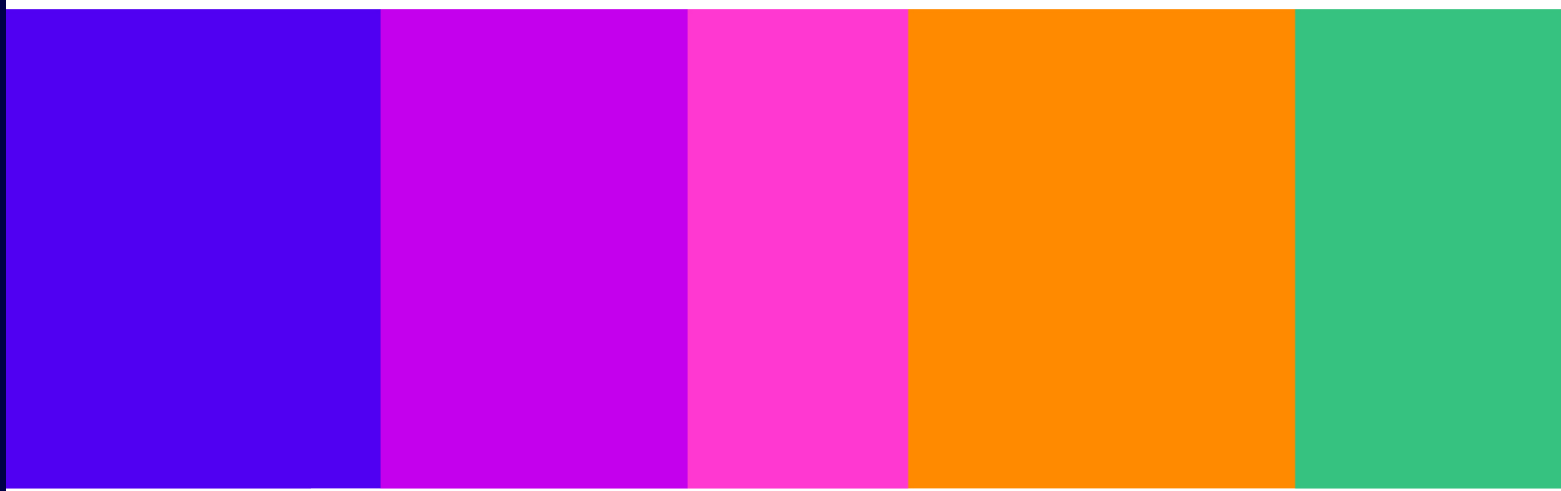


Future of the universal postal service

Summary of responses to our Call for Input and next steps

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1. Overview

In January 2024, we called for a national debate on the future of the UK's postal services, highlighting that letter volumes had halved since 2011 and user needs had changed. We set out evidence we had gathered and options for reform. We invited input from all stakeholders and held events in each UK nation.

This document summarises the responses we received and views expressed at our events. It then sets out our next steps. We do not provide a view on the merits or otherwise of the arguments made in the responses, which are published on the Ofcom website. We are grateful for all the valuable input we received and participation at the events.

In summary

- We received thousands of responses from a range of stakeholders – these made clear that post continues to be a vital communications service for consumers, businesses and government organisations.
- However, it is also clear that there is an urgent need to reform the specification of the postal universal service obligation (USO), so the service remains sustainable and continues to meet future needs.
- Overall, respondents and participants in our public events recognised that the way people and businesses use letters has changed and accepted that this will require changes to the obligations on Royal Mail if we are to ensure the service remains sustainable, affordable and reliable.
- If changes were made to the obligations for Second Class letters and bulk mail services, while maintaining delivery of First Class letters six days a week, it would allow Royal Mail to make substantial efficiency savings. This would not require a change to the minimum USO service levels set out in the Postal Services Act 2011.
- This is largely aligned with one of the options we put forward in January. In its response to our call for input, Royal Mail set out a plan for modernisation, which included a detailed proposal for such changes. Our next steps will focus on a detailed assessment of this option to consider whether it would be a suitable basis for USO reform and the related access letters obligation. As part of our assessment, we will carry out further targeted consumer research and take full account of the issues and concerns raised by respondents to our national debate.
- We expect to publish a detailed consultation on proposals for reform in early 2025 with a view to publishing a decision statement in summer 2025. This timetable reflects the urgent need to reform the specification of the USO so that the service remains sustainable. However, Royal Mail will then need to implement the transformation needed in the business to support regulatory changes.

2. Summary of responses

- 2.1 On 24 January 2024, we published a [call for input on the future of the universal postal service](#). This call for input (CFI) set out evidence that suggested the universal service needs to change to better align with the needs of consumers, and to ensure it can continue to be affordable and sustainable in the future. It sought input on our assessment to help generate an informed public debate on how the universal service should be modernised for the future.
- 2.2 We received a large number of responses to our CFI from a wide range of stakeholders, including individuals, consumer bodies, campaign groups, representative organisations, businesses, public services, access operators and bulk mailers. We also held four stakeholder events in March to inform the debate, and met a number of stakeholders directly to discuss the CFI and hear their views.
- 2.3 We have carefully considered all feedback received and stakeholder views will continue to inform the next stage of our work.

Stakeholder engagement

- 2.4 We received 2,348 responses during the CFI period. We considered all responses submitted including response forms, emails and letters. We received:
- 72 responses submitted by consumer bodies, organisations, businesses, public services, access operators and bulk mailers.
 - 6 responses submitted by elected representatives.
 - 1,468 responses from individuals using the We Own It campaign template response.
 - 802 other responses from members of the public.
- 2.5 We have published non-confidential responses on our website.¹ We have published a spreadsheet containing comments we received from individuals, and a summary of the views expressed where it was not clear whether respondents were happy for their responses to be published.
- 2.6 We held stakeholder events in each UK nation in March to discuss the options for reforming the USO and encourage debate. The events focused on the needs of consumers, small and medium enterprises and bulk mailers. Representatives from Royal Mail, trade unions, consumer bodies, businesses, the greeting card industry, access operators and bulk mailers all contributed to constructive discussions. A recording of the London event is available.²
- 2.7 We are grateful for all the valuable input we received to the CFI and participation at the events.

¹ Responses to our CFI are available here: [Call for input: The future of the universal postal service - Ofcom](#)

² A recording of the event in London on 14 March 2024 is available here: [Post, present and future: discussing the future of the postal service – Ofcom event \(youtube.com\)](#)

Summary of our provisional assessment in the CFI

- 2.8 In our CFI, we called for a **national debate on the future of the UK's postal service** as people send fewer letters and receive more parcels, meaning reform is necessary to secure its long-term future.³
- 2.9 **We highlighted that many people still rely on letters but people's needs have changed.** Post is still seen as an important service by most consumers. The postal service also remains important for social cohesion. For some users, especially for the elderly and less mobile, post is a vital tool to connect with the outside world and maintain contact with their friends and families. Royal Mail postal workers also play an important role in communities.
- 2.10 However, people are sending and receiving fewer letters and increasingly prefer to use digital alternatives. Letter volumes are in rapid decline while parcel volumes have increased. These changes are in line with international trends. USO services account for a decreasing share of Royal Mail's volumes and revenues, while non-USO services have grown.
- 2.11 **While use of letters is declining, many items still need to be sent by letter.** Most users' needs would continue to be met with changes to the letters USO specification in terms of reduced delivery frequency and increased emphasis on certainty of delivery (rather than speed of delivery). Our 2024 qualitative research shows that people prioritise reliability for receiving letters, whereas speed and frequency of delivery are seen as less critical.⁴ More than eight in 10 addressed letters are sent by large organisations, such as the NHS and banks. These are based on commercial agreements with Royal Mail and access operators outside the USO. Many bulk mailers also value reliability over speed and are increasingly choosing slower delivery speeds (within 5 days). Both consumers and businesses do not currently receive the reliable service that they value because of Royal Mail's recent poor quality of service.
- 2.12 **The evidence indicates an increasing risk of the current obligations becoming unsustainable both financially and operationally.** In our CFI, we estimated that the net cost burden of the universal service obligation (USO) to Royal Mail was £325m-£675m in 2021/22.⁵ This range was based on the profits that we calculated Royal Mail could have made if it had not been subject to the USO and had commercial freedom, compared to its actual position in that year (though the range includes the loss of the VAT exemption benefit). While some measure of net cost burden might be justifiable when considered against the benefits associated with owning the postal network, which is a unique national asset, the evidence suggests that this level of net cost is not sustainable in the long-term, noting that Royal Mail has not achieved a level of profitability indicative of USO sustainability since 2015/16.⁶
- 2.13 **The consequence of a letters USO that does not align with people's needs is that people could pay higher prices than necessary.** It also makes it harder and more expensive for Royal Mail to provide a reliable service, and to invest and restructure its network to respond

³ Ofcom, 2024. [The future of the universal postal service – Call for Input](#).

⁴ Jigsaw, 2023. [Understanding the needs of postal service users: A report of findings from qualitative research, with a focus on potentially vulnerable groups](#).

⁵ We did not carry out a formal assessment as set out in Section 44 of the Postal Services Act 2011, but we considered alternative estimation options in arriving at our provisional position. Please see Chapter 8 of the CFI for more information.

⁶ Ofcom, 2023. [Post Monitoring Report](#), p. 23-24.

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to what people place higher value on, e.g., reliability in letters and more service options in parcels.

- 2.14 **We highlighted that the UK is not alone in needing to respond to these challenges.** Across Europe and more widely, universal postal service obligations have been, or are being, reformed.
- 2.15 **We identified two primary options we considered could lead to a USO that more closely aligns with people’s needs for letters and help secure the future of the service:**
- i) making changes to the existing First and Second Class and business products⁷ so that most letters are delivered through a slower service taking up to three days or longer, with a next-day service still available for any urgent letters, which could allow net cost savings of £150-650m; and
 - ii) reducing the number of delivery days offered from the existing six-day-a-week obligation down to five or three. We estimated that Royal Mail could achieve a net cost saving of £100-200m if letter deliveries were reduced to five days; and £400-650m if reduced to three days.⁸
- 2.16 **We said that downgrading quality of service was not an option for reform** and that, as part of any USO reform, it would be important to consider whether additional safeguards are necessary to ensure people’s needs are fully met.
- 2.17 **Finally, we noted that while the evidence suggests that there is a need to reform the universal service, this alone would not provide the answer to the financial and operational challenges Royal Mail faces.** We continue to expect Royal Mail to improve its reliability. In addition, Royal Mail must continue to work towards transforming its network and operations, and improving efficiency, to ensure that consumers get the best possible value for the services they buy. Action in these areas is vital for Royal Mail to rebuild trust and remain a financially sustainable provider of the universal service.

Overview of the responses

- 2.18 The key themes of the responses include:
- The continuing importance of and reliance on letters, despite falling volumes; and strong support for maintaining the fundamental principles of universality, affordability and uniform pricing when assessing potential changes to the USO.
 - Concern about Royal Mail’s quality of service (QoS) performance, the effectiveness of the current QoS enforcement regime, and the need for reliability to be central in any reform. While most accepted that the increased availability and take up of digital communications is the primary cause for the decline in letter volumes, many said that poor reliability combined with price increases are contributory factors.
 - Many respondents accepted that a change to the USO letters specification, allowing slower or less frequent deliveries, would meet most users’ needs provided there

⁷ This refers to the bulk mail services provided through Royal Mail’s retail bulk mail and the services offered by postal operators using Royal Mail’s last mile access services.

⁸ The savings that Royal Mail could have achieved in 2021/2022 if the changes had been in place at that time.

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remained a next-day option. Many felt that this should continue to include Saturday delivery.

- Reform would be acceptable if the benefits realised by Royal Mail helped to maintain the fundamental principles of universality, affordability and uniform pricing, and to secure reliability.
- In terms of delivery frequency, some argued that letter deliveries five days a week would be sufficient to meet most users' needs, as long as the service was reliable, but any further reduction to three days or one day a week was less acceptable.
- In a five-day scenario, respondents from the greeting cards industry and publishers of weekly magazines were keen to maintain Saturday delivery and remove a weekday, while there were many others that said removing Saturday would have the least impact on them.
- Even while accepting change, some respondents were concerned about the prospect of a more expensive next-day/First Class letters product, compared with today's First Class pricing. They argued that this could further accelerate the decline in letter volumes.
- There were respondents who had significant concerns about USO reform and did not accept it was necessary. They argued that changes would adversely affect their work or disadvantage certain groups of users, e.g. older people or those who were not online. Instead, they argued that Royal Mail should focus on improving reliability, becoming more efficient and/or sustaining the USO with new products or services.
- Consumer bodies emphasised the need to conduct further research into the user needs of specific groups before considering options for reform.
- Some called for more services and product features to be included in the USO. This included a Special Delivery end of day product, tracking and a service for vulnerable users without a fixed address (Address and Collect). Others called for greater consideration of what wider role the postal service could serve in society e.g. a role in NHS prescription delivery.
- A large number of individual respondents called for government intervention to renationalise Royal Mail as part of the We Own It campaign; other respondents called for government to subsidise the USO either to maintain the current specification, or to support it while it is reformed. We note that these are matters for the UK Government, rather than the regulator.

Royal Mail's proposal for reform

2.19 Royal Mail published its proposal for reform as part of its CFI response.⁹ It comprises:

- First Class letters to be delivered next day (D+1)¹⁰ with deliveries Monday to Saturday (as per today).

⁹ See Annex 1 of this document for a summary of Royal Mail's proposal. Also see Royal Mail's response to the January 2024 CFI, p.38.

¹⁰ 'D+X' (e.g. D+1, D+3, D+5) indicates the total number of working days (where working days are Monday to Saturday) between the day on which the sender sent the item ('D') the item and it being delivered ('X'). For

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- Second Class letters to be delivered within 3 days (D+3) (as per today), with deliveries on alternate weekdays. However, Saturday would be removed as a delivery day for Second Class letters.¹¹
- The current D+2 access letters products to be aligned with changes to Second Class letters.¹² For the current D+2 product, the delivery speed would change from D+2 to D+3 and Saturday delivery would be removed. For the D+5 product, Saturday delivery would be removed. Deliveries of D+3 access letters would be made on alternate weekdays (in line with Second Class letters).
- No changes to parcels delivery days or speeds, and no changes to letter or parcel collection frequency.
- Various changes to QoS targets (e.g. reducing the primary targets but introducing new secondary “tail of mail” targets);¹³ and
- Adding tracking on parcels to the USO,¹⁴ and an additional Special Delivery end of day product to the USO.¹⁵

2.20 Royal Mail said the changes it proposed would help it to create a more efficient delivery network and lead to savings of up to £300 million a year.¹⁶

example, D+1 refers to the scenario where a customer posts a letter on Monday and it is delivered the next working day on Tuesday, i.e. on D+1. The item must be sent before the last time for collection in order for D to be the day on which it was sent. Where a sender sends an item on a Sunday, ‘D’ is deemed to be Monday.

¹¹ This would allow Royal Mail to implement a 2.5 day a week delivery model. This means half of addresses would receive non-First Class letters on Monday, Wednesday and Friday on week one, and then switch to Tuesday and Thursday the next week, before reverting to the 3 day delivery pattern the week after. This means that each address receives an average of 2.5 deliveries a week.

¹² Royal Mail is required by regulation to offer other postal operators access to its letters network. These operators collect and sort bulk mail from their business customers before handing it to Royal Mail for final mile delivery. We refer to these letters as access letters. These comprise part of Royal Mail’s business services.

¹³ The “tail of mail” targets apply to mail that has not been delivered on time. It sets a secondary target to mitigate the risk of significant delays.

¹⁴ Tracking is a component of the Special Delivery 1pm USO product, but not First and Second Class USO parcels (or letters) products. Royal Mail offers tracked parcel products commercially (outside the USO) e.g. Tracked 24 and Tracked 48.

¹⁵ Special Delivery next day by 1pm is the registered and insured product currently in the USO.

¹⁶ Royal Mail expects its proposal would take 18-24 months to implement. See Royal Mail response to January 2024 CFI, p. 41.

3. Next steps

- 3.1 We have carefully considered the responses to our CFI. It is clear that the universal postal service continues to be a vital communications network for people, businesses and organisations delivering critical public services across the UK.
- 3.2 Overall, while we recognise that many stakeholders have significant concerns about changes to the USO, many of the responses recognise that people's use of letters has declined largely due to digital communications and suggest that a moderate modification to delivery days and/or delivery speeds for letters would be acceptable to most users. This is particularly the case if the benefits realised help to maintain the fundamental principles of the USO (universality, affordability and uniform pricing), and improve the reliability and sustainability of the service.
- 3.3 As we set out in our CFI, there has been a material decline in use of letters since the current USO was defined in 2011, yet services have remained largely the same. The consequences are that while postal services remain vital, the services Royal Mail is required to provide are increasingly costly on a unit basis with consequential impacts on the costs of the services (and pricing and affordability). More fundamentally there is a material risk that the universal service provider will not be able to continue to operate sustainably.
- 3.4 Accordingly, taking the responses to our CFI into account, we remain of the view that there is a clear and urgent need to align the USO specification for letters more closely with the reasonable needs of users, and to ensure the sustainability of the service.
- 3.5 We therefore will be focussing our work on the potential for reform of the USO letters requirements.
- 3.6 Respondents also raised concerns about Royal Mail's QoS performance, which has fallen short in recent years with customers and businesses not receiving a reliable service. We recognise the importance of ensuring that any reform leads to improvements in reliability, and we will be continuing to hold Royal Mail to account for its poor performance. In May, we opened an investigation into its failure to meet its First and Second Class delivery targets for 2023/24.¹⁷ Royal Mail has recently published an update on its plans to improve its performance.¹⁸ We welcome this, and the recent improvements it has made to its performance, but there is more for the company to do and we will be continuing to monitor this closely.
- 3.7 We note the call by consumer bodies for Royal Mail's network to offer or support a service for vulnerable users without a fixed address. We will continue to engage with stakeholders on these issues but note that the Address and Collect service currently proposed by Citizens Advice could not be achieved through regulation solely on Royal Mail given the proposed role of the Post Office.¹⁹
- 3.8 Royal Mail's proposal for reform is largely aligned with one of the options we identified in our CFI (slowing down the delivery speed of most letters), which we provisionally considered

¹⁷ Ofcom, 2024. [Ofcom has today opened an investigation into Royal Mail's failure to meet its delivery targets for 2023/24.](#)

¹⁸ Royal Mail, 2024. [Annual Adjusted Quality of Service Report 2023/24.](#)

¹⁹ Ofcom does not regulate Post Office Limited.

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to be consistent with our understanding of evolving user needs. We also note that Royal Mail's proposal could be consistent with the minimum requirements of a universal postal service set by the Postal Services Act 2011, as First Class letters would still be delivered every day from Monday to Saturday.²⁰

- 3.9 Royal Mail's proposal could be implemented through modifications to Ofcom's regulation only. We anticipate that it could therefore be implemented more quickly than any options which would require changes to primary legislation. As such, and in particular considering the urgent need for reform, we consider that it is appropriate for our next steps to focus on a detailed assessment of Royal Mail's proposal, in order to consider whether it would be a suitable basis for reform to the regulation of the letters USO and the related access obligation.
- 3.10 We intend to conduct our work in two phases. In the first phase we will focus on changes which, if acceptable, would enable Royal Mail to begin implementation of any necessary organisational change. Subject to agreement on the acceptability of Royal Mail's proposal, in the second phase we would focus on the other relevant areas of the regulatory regime. Our initial focus will therefore be on assessing the following:
- a) reducing delivery days for Second Class (D+3) letters by removing Saturday with deliveries Monday – Friday (on alternate weekdays);
 - b) changing the D+2 access letters product to D+3 and removing Saturday delivery. For the D+5 access letters product, removing Saturday delivery. For access letters, deliveries Monday-Friday (on alternate weekdays in line with Second Class letters); and
 - c) whether any amendments to QoS targets for USO services may be necessary in light of the above changes to ensure high levels of reliability.
- 3.11 This first phase of our work will include:
- undertaking a full assessment of whether these proposed reforms would meet reasonable user needs;
 - assessing the impact of any changes on the financial sustainability and efficiency of the USO;
 - assessing the impact of changes on different postal user groups and access operators; and
 - considering what, if any, regulatory interventions are needed to mitigate any negative impacts.
- 3.12 **We expect to publish a consultation on these core changes in early 2025, with a view to publishing a decision statement in summer 2025.**
- 3.13 In the second phase of work we intend to issue consultations to include consideration of and proposals related to:
- **The broader QoS regime** – we will review our overall QoS requirements on Royal Mail and our approach to enforcement to ensure it appropriately incentivises Royal Mail's performance and ensures the high levels of reliability that customers value;
 - **Affordability and pricing** – we will consider options to ensure the continued affordability of USO services, including more targeted interventions than the current Second Class safeguard cap, as well as more broadly reviewing our approach to the regulation of the pricing of Royal Mail's services; and

²⁰ See section 31 of the Postal Services Act 2011.

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- **Other issues** – we will consider other issues such as the structure of the access obligations, and the scope and definition of USO products (such as Royal Mail’s proposal for an additional Special Delivery end of day product to be included in the USO).
- 3.14 We will continue to engage with the Government, Royal Mail, Post Office and consumer bodies to support initiatives to improve access to post for specific vulnerable users (e.g. those who are homeless or victims of domestic abuse).
- 3.15 We are grateful to stakeholders for their responses to our CFI. We understand the importance of our work to respondents and wider society, and will take all views expressed into account as we proceed to the next stage of our work.

A1. Royal Mail proposal

- Royal Mail submitted its proposal for reform of the USO in its response to our January CFI. The key features of its proposal include the following.

Royal Mail’s proposal: summary²¹

Aspect	Summary of proposal
USO Letter product speeds	First Class (D+1) and Second Class (D+3) to stay the same.
USO Letter delivery frequency	<p>First Class letters: deliveries offered Monday – Saturday as now.</p> <p>Second Class letters: deliveries offered Monday – Friday (Saturday is removed). This would allow Royal Mail to implement an alternate day delivery model for non-First Class services (e.g. Second Class and access letters products).²²</p> <p>Universality unchanged (i.e. same products and service levels offered to all addresses UK-wide).</p>
USO Pricing	<p>Retain uniform pricing (one-price-goes-anywhere).</p> <p>Requirement for all USO products to be affordable unchanged.</p> <p>Remove the Second Class safeguard cap and will work with Ofcom to understand the feasibility of a targeted scheme.</p>
Access letter products	<p>Current D+2 access product changed to align with Second Class (D+3), so D+2 changed to D+3.</p> <p>Saturday removed as delivery day for D+3 and for D+5 products.</p> <p>D+3 access letters (which replace D+2 access letters) delivered on alternate days (in line with Second Class letters).</p> <p>RM continues to offer an access next-day letters product which offer deliveries Monday-Saturday alongside its own bulk mail next-day letters product.</p>
USO Parcels	<p>No changes in parcels product speeds or delivery frequency.</p> <p>Royal Mail is required to offer parcel deliveries Monday to Friday. Royal Mail continues its commercial practice to offer delivery on Saturdays and increasingly on Sundays.</p>

²¹ Royal Mail also made a number of proposals to reform the legislative framework and around the timing and conduct of Ofcom’s current and future work. Please see Royal Mail’s response to the January 2024 CFI for further details.

²² See footnote 11 for explanation of an alternate day delivery model.

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Aspect	Summary of proposal
Collections of USO letters and parcels	Unchanged. Collection of letters from access points (e.g. post boxes) Monday-Saturday. Collection of parcels from access points Monday-Friday.
USO Quality of Service	<p>Various changes proposed:</p> <p>First Class: D+1 to 90% (from 93%). New “tail of the mail” target D+2 at 96% (i.e. 96% of First Class mail must be delivered no later than D+2). Remove First Class Postcode Area target (PCA), or change PCA target to 86% (from 91.5%).</p> <p>Second Class: D+3 to 95% (from 98.5%). New “tail of the mail” target: D+5 at 99% (i.e. 99% of Second Class mail must be delivered no later than D+5).</p> <p>Delivery route target: change methodology to measure percentage of delivery points completed daily (not routes completed).²³</p> <p>Christmas period: to start the exemption in late November to include Black Friday and Cyber week.²⁴</p>
USO Additions	<p>Allow tracking on USO parcels.</p> <p>Additional Special Delivery end of day product in USO.</p>

²³ The current delivery route target is as follows: Royal Mail to complete at least 99.9% of all delivery routes each day on which a delivery is required. The target is based on the percentage of routes completed i.e. if one address is missed on a delivery route, this would count as a fail. Royal Mail’s proposal is that the methodology is changed to a target based on the percentage of ‘delivery points’ (i.e. addresses) reached each day on which a delivery is required.

²⁴ The QoS targets do not apply during the Christmas period (the month of December until New Year), due to high volumes of seasonal mail. However, for transparency Royal Mail is required to report on its performance during this time.

A2. List of respondents

- The following responses have been published on our website. Non-confidential responses have been published in full. Partially confidential responses have been redacted as appropriate and published alongside non-confidential responses. Where respondents did not confirm whether or not their responses were confidential, we have published a summary of their views. Three respondents maintained that their responses were wholly confidential but agreed that their names could be published.

- ACE Cards
- Action with Communities in Rural England
- Advisory Committee for Northern Ireland
- Advisory Committee for Scotland
- Association of Electoral Administrators
- Blackburn and District Trades Union Council
- British Independent Retailers Association
- British Inherited Metabolic Diseases Group
- Cambrian Model Rail
- Cardology
- Caroline Ansell MP
- Caroline Lucas MP
- Catherine West MP
- CFH Docmail Limited
- Citipost Mail
- Citizens Advice
- Commissioner for Older People for Northern Ireland
- Communication Workers Union
- Communications Consumer Panel and ACOD
- Consumer Council for Northern Ireland
- Consumer Scotland
- Cotton Traders
- Countryside Alliance
- Credit Services Association
- Cynodis Heavy Industries
- Direct Commerce Association
- Earlybird Designs
- Electoral Commission
- Electoral Management Board for Scotland
- Etsy
- Evri
- Federation of Small Businesses
- Fulprint
- Germinal GB
- Greeting Card Association
- Gretton Books
- Healthwatch England (on behalf of NHS Providers,
- Helen Hayes MP
- House of Cards

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National Voices and
the Patients
Association)

- Immediate Media
- Landsite
- Maryport Town Council
- National Society for Phenylketonuria
- NHS England
- Professional Publishers Association
- Rotherham Talking Newspaper
- Scottish Assessors Association
- Strategic Mailing Partnership
- Transport and Health Science Group
- Unite CMA
- Members of the public (see spreadsheet and three responses published due to length, and summary of views).
- Institute of Biomedical Science
- Mail Users Association
- Moonpig
- National Voices
- Pitney Bowes
- Quadient
- Royal College of Pathologists
- Scottish Grocers Federation
- Tasher Property Co
- Twizler
- We Own It
- Land Registry
- Manchester & Trafford Local Care Organisation (NHS)
- National Federation of SubPostmasters
- Newborn Screening Laboratory Network
- Post Office
- Restore Digital
- Royal Mail
- Spike Publications
- Thortful
- UKMail
- Whistl UK Limited

Confidential responses but who are content for their names to be published.

- Crown Commercial Service
- eBay
- Adare SEC