

## Your response

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- ☒ Other - ACNI

Question	Your response
<b>Question 2.1:</b> Do you agree with the provisional conclusions set out in our Equality Impact Assessment? Please state your reasons and provide evidence to support your view.	<p>Confidential? – ¥ / No</p> <p><a href="#">Summary / ACNI Overview</a></p> <p>The Advisory Committee for Northern Ireland (ACNI) welcomes the opportunity to respond to Ofcom’s consultation on the Universal Service Obligation (USO).</p> <p>Our role is to represent the interests of Northern Ireland (NI) consumers and ensure that their specific needs and circumstances are fully considered. This response builds on our submission to the (Ofcom) 2023 Call for Input and continues to emphasise the importance of maintaining a fair, accessible and reliable postal service for all consumers in NI.</p> <p>We recognise that the postal landscape is changing, both in how consumers use postal services and the pressures faced by Royal Mail and the wider market. It is right that Ofcom reviews and adapts the regulatory framework in response. However, we believe the proposed changes must be thoroughly assessed against the specific characteristics of the NI market. Geography, connectivity challenges and continued reliance on post by public services means that reliability of postal services together with universality remain critical for NI consumers.</p>

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	<p>While we understand many of the drivers behind Ofcom's proposals, in several areas we feel the impacts on NI have not been clearly identified or fully considered. Current performance levels already fall well short of targets in NI and it is unclear how revised standards or efficiencies will deliver improvements for NI consumers. We urge Ofcom to ensure regional variation is more explicitly addressed in both evidence and implementation, to protect consumers in Northern Ireland from a further decline in service and to uphold the principle of equal access across the UK.</p> <p>We do have concerns that the research underpinning this consultation may not adequately reflect the experiences and perspectives of Northern Ireland consumers. With an estimated sample of perhaps less than 100 there is limited evidence that harder-to-reach or more post dependent consumers were actively engaged. Ofcom should be able to demonstrate that it has undertaken sufficient consumer engagement in Northern Ireland to provide confidence that the revised proposals will meet their needs.</p> <p><b>Question 2.1:</b></p> <p>We broadly agree with the principles and intentions set out in Ofcom's Equality Impact Assessment. However, we must question the lack of explicit focus on NI and a lack of confidence that Ofcom's research and stakeholder engagement has sufficiently captured the lived experience of consumers here. While many postal user needs are shared across the UK, NI presents distinct geographical, logistical and socio-economic challenges that would benefit from focused consideration.</p> <p>Northern Ireland's reliance on the universality of the postal service, particularly the principles of one-price-goes-anywhere and next-day delivery across the UK is significant due to our geographic</p>

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	<p>location. The absence of a land connection to the rest of the UK creates a dependency on a robust and equitable postal network. For individuals, businesses and public services alike, universality is not just a principle but a critical enabler of social and economic inclusion.</p> <p>NI consumers in rural and border areas may also be disproportionately impacted by service changes such as reduced delivery days. Vulnerable groups, particularly older people and those with disabilities or low digital literacy, may also face increased barriers if alternatives (such as digital communications) are inaccessible.</p> <p>We would strongly urge Ofcom to more clearly articulate the implications for NI within its Equality Impact Assessment and ensure future research and consultation fully reflect the views and needs of NI consumers, including those in rural and border communities.</p>
<p><b>Question 2.2</b> Do you agree with our assessment under the Welsh Language Standards? Please state your reasons and provide evidence to support your view.</p>	<p>Confidential? – ¥ / No</p> <p>Not directly applicable from a NI perspective. However, we support the principle of language inclusion and recommend that Ofcom ensures accessibility in all parts of the UK where linguistic diversity is a factor, including for example Irish language users (and other languages e.g. Polish) in NI.</p>
<p><b>Question 3.1:</b> Do you agree that we have identified the reasonable needs of post users? Please provide reasons and evidence for your views.</p>	<p>Confidential? – ¥ / No</p> <p>ACNI recognise and agree that many of the needs identified by Ofcom remain relevant and continue to reflect the needs of postal users across the UK.</p> <p>However, we would urge Ofcom to ensure it draws a clearer distinction between UK-wide commonalities and region-specific issues, particularly those</p>

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	<p>that affect NI. This echoes the position set out in our response to Ofcom's earlier Call for Input on the future of the universal postal service (February 2023), in which we emphasised the importance of regionally sensitive analysis and policy design.</p> <p>While we understand and accept the shifting landscape in terms of how consumers use and rely on post, Northern Ireland continues to face unique conditions that increase dependency on a reliable and universal postal service. Public services in NI, including Health and Social Care (HSC), the Police Service of Northern Ireland (PSNI), courts and wider government departments, routinely use postal services as a primary communication method. This means that reliability, timeliness and affordability of postal services are not just matters of consumer convenience but central to the delivery of public services.</p> <p>We would encourage Ofcom to explicitly draw out regional differences in user experience, usage patterns and dependencies to more clearly articulate the full range of postal user needs across the UK, including those in Northern Ireland.</p>
<p><b>Question 3.2:</b> Do you agree that the market is meeting the reasonable needs of post users? Please provide reasons and evidence for your views.</p>	<p>Confidential? – <del>Y</del>/ No</p> <p>In our view, the market is not currently meeting the reasonable needs of all postal users, particularly in NI. While the consultation sets out performance metrics, the lived experience of many consumers and indeed recent regulatory action by Ofcom itself (including the fine issued to Royal Mail for failing to meet delivery targets), confirm that existing service levels are falling short of both current expectations and regulatory standards.</p> <p>These shortcomings are particularly pronounced in NI, where geography, rurality and the lack of physical connection to the rest of the UK compound</p>

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	<p>delivery challenges. For rural communities and those in more remote areas, delayed or inconsistent service can have disproportionate impacts. Added to this is the greater reliance on postal services by public bodies in Northern Ireland, including the health service, policing, courts, and government departments, as a primary channel for communicating with the public. In this context, a letter is of upmost importance as it may be an appointment, a legal notice, or an urgent health message. Often Health and Social Care (HSC) agencies will write to a patient requiring a response within 10 days. Failure to meet this requirement can result in a person being removed from a waiting list and referred back to their GP. This can create significant anxiety, particularly given the length of waiting lists in NI and the heavy reliance on post as the primary method of communication.</p> <p>We are concerned that these important regional factors do not appear to have been adequately captured in the evidence base presented or reflected in the design of potential regulatory options. Even more worrying is the risk that current market performance in Northern Ireland would not only fail existing targets but could also fall short of the revised standards being proposed.</p> <p>ACNI also seeks assurance that the potential cost savings that Royal Mail is expected to realise from the proposed changes would be distributed equitably. How can we be confident that NI, given its unique operating challenges will receive a fair share of any reinvestment or measures to protect service levels? There is a real risk that any reduction in universal service standards could disproportionately impact NI consumers, exacerbating existing service issues.</p> <p>To that end, we would urge Ofcom to ensure any modelling of costs and benefits includes region-specific analysis and safeguards to avoid a further</p>

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	<p>deterioration of service quality for consumers in NI.</p>
<p><b>Question 5.1:</b> Do you agree with our proposals and impact assessment on changes to the delivery frequency of Second Class letters so that those items would be delivered every other day from Monday to Friday, and would not have to be collected, processed or delivered on Saturdays? Please provide reasons and evidence in support of your views</p>	<p>Confidential? – Y / No</p> <p>(i) On the Impact Assessment:</p> <p>We acknowledge that Ofcom has presented evidence of changing consumer behaviour and letter volumes. However, we would question whether the assessment sufficiently captures the regional realities and implications for NI.</p> <p>We also seek assurance as to whether the financial savings estimated to result from these proposals will be realised uniformly across the UK. There is currently no clear mechanism to ensure that any efficiencies gained would be reinvested in ways that benefit consumers in NI, particularly those most at risk of a deterioration in service quality.</p> <p>(ii) On the proposal itself:</p> <p>While we recognise the need to modernise postal services in line with changing usage patterns, it is important to acknowledge that, in practice, service standards have already declined. Many users are effectively receiving a reduced level of service compared to what is currently mandated and in many cases below the revised levels proposed in this consultation.</p> <p>We note that some of the most relied-upon uses of postal services in Northern Ireland, such as the receipt of medical appointment letters from Health and Social Care (HSC), fall outside the scope of the Universal Service Obligation. This reliability of Second-Class post is essential and any perceived reduction in reliability or dependability could lead to anxiety, missed appointments, or limited engagement with public services.</p>

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	<p>Given these concerns, we believe, further engagement and detailed, regionally specific analysis is required before any changes to Second Class delivery frequency are implemented.</p>
<p><b>Question 6.1:</b> Do you agree with our proposal to set the First Class national D+1 performance target to 90%? Please provide reasons and evidence for your view.</p>	<p>Confidential? – ¥ / No</p> <p>We recognise the rationale provided by Ofcom for adjusting the First Class D+1 target, including reference to international comparators and operational pressures. However, we would caution that setting a revised performance target only has value if it is meaningful, realistic and reflects actual delivery performance.</p> <p>From a NI perspective, next-day delivery is a vital part of ensuring parity of service with the rest of the UK. The principle of universality, including timely and geographically consistent service, is of critical importance to consumers and businesses here, especially given our geographical separation and dependence on post for both personal and professional communications.</p> <p>We are concerned that Royal Mail's recent delivery performance falls significantly below even the revised 90% threshold. For Northern Ireland it would appear consumers are paying a premium for First Class postage without receiving a First-Class service. In this context, we question whether the proposed target will drive meaningful improvement or simply cement a reduced level of service that many consumers are already experiencing.</p> <p>While we acknowledge the factors driving this proposal, we remain doubtful that the revised 90% target represents a meaningful improvement, particularly in the absence of consistent delivery performance and continuing failure to meet targets.</p>

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	<p>There is a risk that it could legitimise underperformance rather than address it.</p> <p>We are not confident that the full implications for NI consumers, who often experience slower delivery times despite paying first-class rates, have been adequately assessed. Before adopting any revised target, we believe Ofcom should provide greater assurance that regional needs have been fully understood and will be actively addressed.</p>
<p><b>Question 6.2:</b> Do you agree with our proposal to set the First Class PCA D+1 performance target to be 3% lower than the national target (i.e. for the PCA target to be 87% to align with our proposed 90% national target)? Please provide reasons and evidence for your view</p>	<p>Confidential? – ¥ / No</p> <p>Many of the concerns raised in our response to Question 6.1 are relevant here. We understand the intention behind setting a PCA (postcode area) target that provides some flexibility to account for regional operational challenges. However, we remain concerned that the proposal does not fully account for the existing performance deficits already experienced by consumers in NI.</p> <p>According to Ofcom’s latest monitoring report (Q3 2024–25), the BT (NI) postcode area is currently performing well below both the current national D+1 target and the proposed revised PCA target. This raises serious questions about the appropriateness and enforceability of a lower PCA threshold if it risks further entrenching failures in service standards.</p> <p>If a PCA target is to be introduced, it must not be used as a mechanism to excuse persistently lower performance in certain regions. We believe further evidence is needed to demonstrate how this proposal will actively improve service delivery in underperforming postcode areas rather than simply allowing for lower standards.</p>
<p><b>Question 6.3:</b> Do you agree with our proposal to introduce a new First Class ‘tail of mail’ target of 99.5% at D+3? Please</p>	<p>Confidential? – ¥ / No</p> <p>We recognise that the introduction of a ‘tail of</p>



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<p>provide reasons and evidence for your view</p>	<p>mail' performance target is a new and potentially innovative approach to strengthening service accountability. In principle, we welcome the thinking behind this proposal, particularly the intent to ensure that a very high proportion of mail is delivered within a reasonable timeframe, even where D+1 targets are not met.</p> <p>However, we remain cautious. This approach introduces an additional performance measure on top of existing D+1 and D+3 metrics, and we are concerned that the resulting framework could become increasingly complex and difficult for consumers to understand. Clear and consistent performance expectations are critical to maintaining public trust in postal services and further layering of targets may undermine that clarity.</p> <p>In relation to NI, we are particularly concerned that consumers may be disproportionately affected by this “tail” of delayed mail due to geographic and logistical factors. There is a risk that this proposal could inadvertently reinforce a lower standard for certain areas, emphasising rather than addressing regional disparities in service quality.</p> <p>Given these concerns, we believe the ‘tail of mail’ concept warrants further modelling, testing and public engagement. We would encourage Ofcom to explore in more detail how this measure would interact with existing targets. It would be important to examine whether it aligns with the expectations of consumers in NI, where universality and timeliness of First Class service remain especially important.</p>
<p><b>Question 6.4:</b> Do you agree with our proposal to set the Second Class D+3 performance target to 95%? Please provide reasons and evidence for your view.</p>	<p>Confidential? – ¥ / No</p> <p>The concerns raised in response to Question 6.1 are relevant to this question.</p>

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	<p>Second Class mail is becoming an increasingly essential service for consumers, particularly as the cost of first classmail continues to rise. As Ofcom's own monitoring report (2023–24) notes <i>'Consumers increasingly report switching away from First to Second Class products...with cost being the main driver for choosing Second Class stamps all or most of the time.'</i> This shift highlights the growing reliance on Second Class as the default option for many consumers, particularly those on lower incomes.</p> <p>This growing reliance on Second Class services means they are no longer simply a cheaper alternative, but the default choice for many consumers, particularly for those on lower incomes. It is therefore essential that this service is held to a high and consistent standard, with strong regulatory oversight. In Northern Ireland, where consumers already face delivery challenges and cost sensitivity is high, robust performance monitoring and enforcement are vital to protect fairness and reliability.</p>
<p><b>Question 6.5:</b> Do you agree with our proposal to introduce a new Second Class 'tail of mail' target of 99.5% at D+5? Please provide reasons and evidence for your view.</p>	<p>Confidential? – <input checked="" type="checkbox"/> / No</p> <p>As with our comments on the First Class 'tail of mail' target, we would urge Ofcom to ensure this new measure does not become a mechanism to justify poorer service in harder-to-reach areas such as Northern Ireland.</p> <p>Given the growing reliance on Second Class services, as highlighted in Ofcom's latest monitoring report, we believe strong oversight and transparency will be essential. This target must deliver genuine protection for consumers who increasingly view Second Class mail as their default, not their secondary, postal option.</p>

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<p><b>Question 7.1:</b> Do you agree with our proposal to regulate D+3 access services, subject to a margin squeeze control and the other protections outlined above? Please provide reasons and evidence for your views.</p>	<p>Confidential? – <del>Y</del> / No</p> <p>From a consumer perspective, we understand Ofcom is seeking to ensure that companies who use Royal Mail’s network to deliver post are treated fairly and that prices are set in a way that allows for choice and competition in the postal market.</p> <p>That said, our main concern is how these kinds of changes will benefit consumers in NI. Will this lead to better, more reliable services, or lower prices? Or will they mainly support business users or companies in more accessible parts of the UK, with little visible improvement for communities here, especially in rural or hard-to-reach areas?</p> <p>As we have referenced throughout our response, Northern Ireland consumers have specific needs and challenges when it comes to postal services. Any changes to how the system operates must take this into account and ensure that service standards are protected not weakened</p>
<p><b>Question 7.2:</b> Do you agree with our proposal to change the specification of D+5 access services to remove Saturday as a delivery day? Please provide reasons and evidence for your views.</p>	<p>Confidential? – <del>Y</del>/ No</p> <p>We are concerned that the removal of Saturday deliveries may have unintended consequences for consumers in NI. While this may appear to be a minor technical change, any further reduction in delivery days could impact an already declining level of service, particularly for rural communities and those who rely on regular, timely post.</p> <p>In Northern Ireland, public services such as health, courts and other departments continue to rely heavily on the postal system as their primary way of contacting people. The removal of Saturday deliveries risks creating longer delays in receiving time-sensitive communications, particularly for consumers who may not be digitally connected.</p>

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	<p>Even if D+5 services are not part of the USO, the reality is that many consumers do not differentiate between types of post - they simply judge their postal experience by whether letters arrive reliably and in good time. We would urge Ofcom to consider the broader consumer impact of this change, especially in countries like Northern Ireland, where reliance on post is higher and alternatives may be limited.</p>
<p><b>Question 7.3:</b> Do you agree with our proposals to maintain a margin squeeze control on D+2 access services, where the relevant retail services are Royal Mail's First Class retail bulk services? Please provide reasons and evidence for your views.</p>	<p>Confidential? – Yes / No</p> <p>While we recognise that this issue is mainly of relevance to postal operators and businesses that use Royal Mail's network, we support measures that help maintain a fair and competitive postal market. Ultimately, consumers benefit when there is genuine competition and choice in how mail services are provided.</p>
<p><b>Question 7.4:</b> Do you agree with our proposals for pricing transparency and amending how access services are defined? Please provide reasons and evidence for your views.</p>	<p>Confidential? – Yes / No</p> <p>From a consumer perspective in NI, ACNI supports greater transparency in how postal services are priced and defined, particularly where this helps ensure fairness, clarity and consistency in the market. For many users, especially in rural and more remote areas, postal services remain essential and there is often little awareness of the technical distinctions between different services (USO mail, bulk mail etc).</p> <p>It is important that any changes to service definitions do not lead to confusion or reduce protections for consumers. We would encourage Ofcom to ensure that clear, accessible explanations accompany any redefinition of access services and that regional implications, particularly in areas like NI, are carefully considered in both implementation and communication.</p>

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