

## Your response

Please tell us how you came across about this consultation.

- ☐ Email from Ofcom
- ☐ Saw it on social media
- ☐ Found it on Ofcom's website
- ☐ Found it on another website
- ☐ Heard about it on TV or radio
- ☐ Read about it in a newspaper or magazine
- ☐ Heard about it at an event
- ☒ Somebody told me or shared it with me
- ☐ Other (please specify)

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.	Confidential? – Y / N
<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.	Confidential? – Y / N
<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.	Confidential? – Y / N  The consultation makes a reasonable assessment of the needs of post users. Saturday deliveries are helpful, and a system of alternate days six-days-a-week would be preferable to the current proposal. However, the over-riding need of post users is for a sustainable postal system without permanent above-inflation price rises, so the imperative to control the costs of the service is paramount.
<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.	Confidential? – Y / N

Question	Your response
	The market is delivering for users as much as possible within the current constraints of unsustainable price rises, and poor adherence to delivery time commitments.
<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>Confidential? – Y / N</p> <p>Given the paramount need to stop above inflation price rises, the proposed change is a reasonable response to changes in the postal market. However, I do not see justification for the degradation of reliability targets at the same time – the changes should allow Royal Mail to improve reliability, not reduce it.</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>Confidential? – Y / N</p> <p>No. The proposed changes should allow reliability targets to be increased, not reduced.</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>Confidential? – Y / N</p> <p>No. The targets should align and be higher.</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 provide reasons and evidence for your view	<p>Confidential? – Y / N</p> <p>Yes.</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>Confidential? – Y / N</p> <p>No. The D+3 reliability target should be higher than the current target, not lower. The quality of the service is being reduced, so the quid pro quo is the reliability should be higher. This fits with your own analysis of the needs of postal users – that price and reliability are more important than speed.</p>

Question	Your response
<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.	Confidential? – Y / N  Yes.
<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.	Confidential? – Y / N  Yes
<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.	Confidential? – Y / N  Yes. This is necessary to gain the best cost advantages of removing the Saturday service.
<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.	Confidential? – Y / N  Yes
<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.	Confidential? – Y / N  Yes

I have two further comments:

1. Royal Mail currently expect to bring in the new regime within around a week of announcement. This is unusually fast, and would be problematic for the market. For example as software suppliers to the postal market, we will need to release an update once we have formal notification of the go-ahead decision. One month would be more appropriate.
2. Royal Mail have data available overnight for the Delivery Points that are not scheduled for D+3 delivery (Light delivery points) but that will be opened due to First or D+2 (Priority) mail being delivered. Provision of that data overnight in an open data format would be highly valuable to mail users attempting to optimise the system, for example to inform call centre operations. Royal Mail are proposing to make Walk

Visibility data available, which is important, but open provision of Open Delivery Point data is equally important to many of our clients.

Please complete this form in full and return to [futurepostaluso@ofcom.org.uk](mailto:futurepostaluso@ofcom.org.uk).