

Your response

Please tell us how you came across about this consultation.

Alerted by Ofcom as industry body

Question	Your response
Question 2.1: 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
Question 2.2 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
Question 3.1: Do you agree that we have identified the reasonable needs of post users? Please provide reasons and evidence for your views.	Confidential? – Y / N
Question 3.2: 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 5.1: 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	Confidential? – Y / N
Question 6.1: 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.	Confidential? – N

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	<p>A 90% target for First Class mail better reflects today's operational realities—especially given falling letter volumes and shifts in consumer behaviour. Our members still rely on next-day performance for time-sensitive mailings, but also recognise that aiming for 93% in the current market environment may drive up costs unnecessarily. A 90% target strikes a workable balance between customer expectations, affordability, and Royal Mail's capacity to deliver consistently.</p>
<p>Question 6.2: 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? – N</p> <p>Yes. The slight flexibility in postcode-area (PCA) targets—setting them at 87%—is realistic given that not all regions face identical operational challenges or delivery conditions.</p>
<p>Question 6.3: 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>	<p>Confidential? – N</p> <p>Yes, the DMA supports a 'tail of mail' target to ensure that items not delivered by D+1 still arrive promptly. Introducing a 99.5% requirement by D+3 provides an extra layer of reliability, particularly for marketing or transactional mail that may have missed initial cut-offs. It also strengthens customer confidence in First Class by setting a clear threshold for late deliveries.</p>
<p>Question 6.4: 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? – N</p> <p>A 95% target for Second Class mail over three working days both reasonable and achievable. While many DMA members use Second Class for cost-sensitive marketing communications</p>

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	<p>and routine business mail, ensuring timely arrival is crucial. 95% would appear to still be a reasonable result.</p>
<p>Question 6.5: 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? – N</p> <p>Yes. Similar to the First Class ‘tail of mail’, a D+5 benchmark at 99.5% reassures senders that almost all delayed items will be delivered within a few extra days. Our members value such clarity, as it helps maintain trust in the postal network’s dependability.</p>
<p>Question 7.1: 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? – N</p> <p>Yes, we agree that a regulated D+3 access service is appropriate for the data and marketing community. Most of our members rely on DSA Standard for sending bulk advertising and business communications. Shifting to a Monday–Friday schedule and aligning the speed with Second Class timing is a reasonable change in light of declining letter volumes.</p> <p>Importantly, if the cost savings gained from removing Saturday service are reflected in stable or “frozen” prices, this can mitigate any operational challenges arising from altered delivery windows.</p>
<p>Question 7.2: 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? – N</p> <p>Yes. For many of our members that utilise DSA Economy (D+5), the removal of Saturday deliveries represents a relatively minor shift in operational terms. The cost pressures of maintaining a full six-day network for lower-priority mail are no longer sustainable, and we believe</p>

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	<p>restricting D+5 to weekdays will help reduce overheads that otherwise lead to higher post-age costs.</p> <p>While any transition requires organisations to adjust production schedules and response-planning, a Monday-to-Friday model is consistent with actual mailing patterns. Provided that delivery reliability improves—and we see genuine efforts from Royal Mail to hold or stabilise prices—removing Saturday from D+5 is a pragmatic step toward a sustainable universal service.</p>
<p>Question 7.3: 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? – N</p> <p>Yes. D+2 is crucial for mailers who need faster turnaround and still see Saturday delivery as vital to certain campaigns. While D+2 will cost more than slower services, the DMA’s position is that cost discipline remains essential. Maintaining a robust margin squeeze control ensures that Royal Mail does not pass on disproportionate costs, which could undermine the competitiveness of direct mail.</p> <p>By retaining Saturday deliveries exclusively for this “Priority” category, organisations requiring time-sensitive mailings can continue using D+2. The DMA supports Ofcom’s proposal to ensure D+2 remains protected by regulatory oversight, preventing prices from escalating beyond reason.</p>
<p>Question 7.4: 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? – N</p> <p>Yes. We welcome greater transparency in pricing, as it enables our members—who manage large-scale mailings—to budget, plan campaigns, and compare service levels effectively. Clarity over how access services such as D+2,</p>

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	<p>D+3, and D+5 are defined under regulation is vital for operational planning.</p> <p>The DMA also encourages Ofcom to continue collaborating with industry to ensure price changes and product definitions remain accessible and understandable.</p>
Implementation period	<p>Currently, it is proposed that the changes in the USO consultation may come into force instantaneously upon Ofcom approval . It would be beneficial for business planning to have some lead-in time from when the decision is announced by Ofcom. Members felt 3 months from Ofcom approval would be suitable.</p>
Conclusion	<p>In summary, the Data & Marketing Association (DMA) and its members find Ofcom’s proposed reforms both proportionate and essential to ensure a reliable, sustainable postal service. While the adjustments—particularly the removal of Saturday deliveries for certain products—may require operational changes, the overriding view is that these measures are relatively minor in the larger context of keeping the Universal Postal Service stable. The consensus among our members is that the benefits of cost containment, improved delivery reliability, and pricing clarity significantly outweigh any potential disruptions. By concentrating key delivery operations on weekdays, Royal Mail can more effectively manage declining letter volumes and prevent further price hikes, thus offering continued value to mail users. The near-uniform agreement across the DMA membership underscores our confidence that these updates are not only practical, but necessary. We look forward to working with Ofcom and other stakeholders to ensure a seamless transition.</p>

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