

## A4. Consultation questions

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)    following up response to first consultation

### Gretton Books Ltd responses to Ofcom consultation –

Review of the Universal postal service, etc.

2.1, 2.2, 3.1, 3.2 Nothing to add to our response to the first consultation, other than to emphasise the point made then that needs are not the same as focus group or opinion poll, let alone business and government, views. Some might argue that a consultation primarily reflecting (a) the existing owners and (b) the digitally literate and/or younger age groups is inappropriate and not Ofcom's role.

Some would go further and describe it as ageist.

Reducing the frequency of 2nd class post will also have a major impact on SMEs that cannot afford to send material 1st class and are not large enough to have alternative courier arrangements. Customers will experience the impact similarly.

5.1 No - and I'm not clear how this will work in practice. For example:

Will delivery rounds for 1st and 2nd class post take place on alternate days?

Will full delivery rounds take place every day but post be delivered only to alternate properties?

Will full delivery rounds take place every day but 2nd class post only be delivered on alternate days?

Given that it is suggested that 2nd class post not be delivered on Saturdays, what will happen in Bank Holiday weeks?

In these weeks, what will a previous pattern of M, W & F for 2nd class post change to? Or might this mean that 2nd class post posted on a Tuesday in the week before a BH week not be delivered until Wednesday of the following week (i.e., 8 days later and therefore breaching USO standards by a substantial margin)?

Is it not Ofcom's responsibility in any far-reaching consultation such as this not to indicate how it expects its proposals to work in practice? This would not be to fetter the actual arrangements put in place by the business but would demonstrate that Ofcom had thought through the consequences – for postal staff as well as the service's users and customers.

Furthermore, what will be the impact for sorting and delivery staff?

Will staff currently employed permanently be reduced to three day weeks?

Will more staff be employed on three day week contracts?

Will more staff be employed on a bank/casual basis rather than as full-time, pensioned employees?  
What are the implications of changed employment for the working people concerned?

6.1 and 6.4 No to both. Ofcom's purpose (as with all regulators) is to act on behalf of the public and oversee the existing USO accordingly. It should not be amending the USO solely because the current private business finds it is not making sufficient profits. This is **NOT** growth (even economic, let alone societal growth) in any meaningful sense and Ofcom should focus on its core regulatory task rather than being diverted by business or Treasury short-term pleas.

In any case my understanding is that the prospective purchaser of Royal Mail has assured the relevant Select Committee that it will adhere to the existing USO. Why would Ofcom want to cut across that commitment simply because the existing owner considers shareholders more important than customers? Without the latter there will be no business, but the post had existed as a public service for hundreds of years with only one 'shareholder', the government.

In effect, therefore, Ofcom is putting the cart before the horse and one must question why.

6.2, 6.3, 6.5 These are superficial and inappropriate questions masquerading as technical ones. As such, they are a nonsense – especially in the light of our 6.1 and 6.4 responses above.

hg/Ofcom 2nd consultation response  
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