

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
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.	<p>Confidential? – N</p> <p>The conclusion that <i>“Our provisional view is that the benefits of our proposals for reform of the postal service, and the potential costs and risks of inaction, outweigh any costs or adverse effects arising from the proposals. We therefore consider our proposals?”</i> Seems to be pushing more people online, instead of looking at the whole infrastructure around the benefits of post to vulnerable groups. Increased isolation impacts on health, which costs the state etc.</p> <p>The NFSP does not believe that while RM make a profit, it is ethical to cut delivery days. We would like to be assured that RM’s costs are thoroughly audited and investigated before any changes to the USO are recommended. Currently we are not convinced that costings and efficiencies have been fully scrutinised, especially as RM has regularly failed to meet its efficiency targets.</p> <p>We do not feel there has been sufficient one-on-one consultation with all vulnerable groups, those most impacted by any USO changes. We feel confident that some of these</p>

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	vulnerabilities will be exacerbated by fewer delivery days.
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? – N NA
Question 3.1: Do you agree that we have identified the reasonable needs of post users? Please provide reasons and evidence for your views.	<p>Confidential? – N</p> <p>As a representative body for Postmasters, we disagree with this statement. The consultation seems to be designed to not fully delve into all stakeholder concerns. For example, those wanting an affordable First Class service who don't think it currently is, this needs more individual data on what is classed as affordable, and what are the factors that could change and have more of an impact on affordability. This research area needs finer detail.</p> <p>We do not feel there is sufficient emphasis placed on the concerns of those who want a reliable Second Class service delivered more than three times a week. This consultation feels weighted heavily towards RM's needs and not to those of the user.</p> <p>The NFSP also believes that customers want a proof of postage for letters, and compensation paid when items not delivered. This would help with quality of service and also would be a trade off for the new 'tail of mail'. Therefore, a tracked letters service should be provided within the USO. Research shows that 30% of all Royal Mail labels are tracked, which proves the need.</p> <p>Further, the price gap between online and over the counter for RM services promotes a</p>

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	digital exclusion penalty and allows RM to profiteer within a monopoly market.
<p>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.</p>	<p>Confidential? – N</p> <p>The market is not meeting the needs of most post users currently, due to high costs, unreliable service and no tracking on letters. Therefore to diminish it further will impact on all users</p>
<p>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</p>	<p>Confidential? – N</p> <p>We do not agree with Ofcom’s proposals and impact assessment on changes to the delivery frequency of Second Class letters as rural communities rely heavily on postal deliveries. Fewer deliveries will further isolate these communities due to the limited alternatives offered, and the standard could be second class taking a week to be delivered.</p> <p>Vulnerable groups and the elderly will feel they are more socially excluded. Rural communities will struggle to feel connected to the rest of the UK, and there is no indication that these proposals will not worsen reliability, and we do not feel at all confident in the measures to check the impact.</p> <p>The NFSP is concerned that there has been no adequate assessment of the economic knock on effect on industries impacted by these changes as set out in the Communications Act 2003.</p> <p>Fewer deliveries will push many towards First Class, the cost of which has increased way beyond inflation. These measures split the letters market into First and Third Class seg-</p>

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	<p>ments as the gap between the two in reliability and price is extremely wide. The USO will effectively push users into the expensive option by lessening the reliability of the service protected by the price cap.</p>
<p>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.</p>	<p>Confidential? – N</p> <p>No</p> <p>If second class deliveries are reduced and postal users are pushed to pay for a first class service, then targets should increase and not decrease. Why should customers pay increasing stamp costs every year, and then expect lower target levels? This is especially frustrating when there is no proof of Ofcom pushing RM to drive efficiencies first before cutting services and increasing prices.</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? – Y / N</p> <p>No</p> <p>First class PCA D+1 is for urgent, high priority items, next day delivery aim should be higher than 87%. Why propose decreased targets and fewer delivery days, all in a market where the price point endlessly increases?</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>No</p> <p>0.5% of first class mail will be getting a second class service having paid for First Class.</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>No</p> <p>We believe the performance should be the same as first class, 98.5% should be delivered D+3. Quality levels should be the same, just</p>

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	longer delivery time. This would cement reliability which is a key customer need.
<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>No</p> <p>We do not agree with fewer delivery days, therefore cannot agree to D+5, when at a minimum it should be D+4. This just allows for a very poor service. We do not agree with the tail of mail concept.</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? – Y / N</p> <p>No</p> <p>The NFSP does not deal with access services, therefore access customers are better placed to answer this.</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? – Y / N</p> <p>No. While RM are posting profits and paying fines, the service should not be allowed to decrease, nor should RM be allowed to take measures that will actively lead to the decline in the number of letters sent.</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? – Y / N</p> <p>No</p>
<p>Question 7.4: Do you agree with our proposals for pricing transparency and</p>	<p>Confidential? – Y / N</p>

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amending how access services are defined? Please provide reasons and evidence for your views.	The price cap on second class stamps help protect vulnerable and isolated groups, therefore pricing transparency is welcomed. However we would like to see a price cap on First Class also.

Please complete this form in full and return to futurepostaluso@ofcom.org.uk.