

Our Ref: GS 11.0
11 January 2013

Michelle Koretz
Floor 2
Dept Consumer Affairs
Riverside House
2A Southwark Bridge Road
London
SE1 9HA

Dear Ms Koretz,

I am writing in response to Ofcom's proposal to give a direction according to which Royal Mail's Universal Service obligations would be suspended in Northern Ireland on the day following the Battle of the Boyne bank holiday.

Where the usual date for this bank holiday falls on a Saturday the bank holiday is celebrated the following Monday. In that instance Ofcom would suspend Royal Mail's Universal Service obligations the preceding Saturday.

This proposal follows the 2009 decision by the former regulator, Postcomm, to give a similar direction for a period of three years, which expired in October this year. Following an application from Royal Mail, Ofcom now propose to make the direction indefinite.

The CWU has consistently supported the regulator's suspension of Universal Service obligations on days following bank holidays. As previously noted by Postcomm, the vast majority of businesses and public organisations are closed on this day in Northern Ireland, so that there is little social benefit from imposing a full service day.

As noted by Ofcom, there is a longstanding tradition under which many postal workers take the day following the Battle of the Boyne bank holiday as annual leave. This enables postal workers to enjoy some time with family and friends along with other Northern Irish workers. This arrangement is only made practicable by the Universal Service exemption, and there would be significant difficulties created were this year's arrangements to be changed.

We believe the proposed exemption is consistent with Ofcom's primary duty to secure the provision of the Universal Service. Royal Mail is the only operator capable of delivering the Universal Postal service, and Ofcom accept that Royal Mail's financial difficulties threaten Universal Service delivery. The costs of

maintaining full service on days when business closures mean low mail volumes are likely to be high, and disproportionate to any public benefit.

We note that Ofcom state that there has been no objection made, either to them or Postcomm, regarding the suspension of the Universal Service Obligation on the day following the Battle of the Boyne bank holiday at any point in the past, and entirely support the proposal to extend this arrangement to take effect until further notice.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'W Hayes', with a stylized, cursive script.

W HAYES
General Secretary