

**Title:**

Mr

**Forename:**

Stephen

**Surname:**

Hughes

**Representing:**

Self

**Organisation (if applicable):**

**Email:**

**What do you want Ofcom to keep confidential?:**

Keep nothing confidential

**If you want part of your response kept confidential, which parts?:**

**Ofcom may publish a response summary:**

Yes

**I confirm that I have read the declaration:**

Yes

**Ofcom should only publish this response after the consultation has ended:**

Yes

**Additional comments:**

**Question 1: Do you agree with our proposals for the structure and form of the safeguard cap? If not, please explain why.:**

While I broadly agree I feel that studies should have been undertaken in to way to minimise the impact of these changes to businesses and consumers. I run an online shop selling items to railway modellers. Many of my items fall in to the Large Letter size to the increase is not that significant. The main problem I have with the changes is where items fall just over the current Large Letter size in to the Packet size, or where I sell to overseas customers where

sizing is not taken in to account. The vast majority of letterboxes in the UK will take items up to about 40mm thick, many will take larger than this. The argument for allowing significant price rises on packets was to cover the situation where they had to be returned to the delivery office as there was no-one home to accept them. Where items fall outside the Large Letter sizing but will still fit the majority of UK letter boxes this argument falls down. Coupled with the fact the weight 'bands' below 750g have been removed for packets, I have found that for the majority of items I sell which fall under these circumstances, the price has gone up by over 70% yet the costs to the Royal Mail to deliver these items is actually no greater than for the equivalent Large Letter item which is 1/3rd the price.

I feel that before this change was made to the pricing and weight structure of the packet system research should have been done in to finding the average size of item which will fit in a UK letter box and redefining the Large Letter size to suit.

Further, I feel that the pricing of items overseas should have been looked in to as even small items are charged at 3-4 times the equivalent UK price. An item which would cost 90p to deliver in the UK costs £2.70 to deliver to Europe and £3.30 to deliver to the rest of the world. This means that in many cases it is simply not economical to sell outside the UK.

**Question 2: Do you agree with our recommendation of up to 53% for the maximum increase permitted by the cap (in addition to inflation)? If not, please explain why.:**

As above, such an increase should only have been allowed if steps were taken to ensure it is proportionate to the costs of delivering items.

Further cost reduction measures could also have been considered. For example, I am rarely in to accept deliveries that do not fit through my letter box or need signing for. I would rather I could specify that these items are not brought out and left at the sorting office for me to collect, this saving the Royal Mail time and money.