



10 September 2015

Consumer Affairs
Ofcom
(By email to: usoexceptions@ofcomorg.uk)

Dear Carmen To,

Citizens Advice Service (Citizens Advice and Citizens Advice Scotland) and Consumer Council for Northern Ireland response to Ofcom's consultation on universal service exceptions to Royal Mail's universal service obligation

As the statutory representative for consumers of postal services across the UK, the Citizens Advice Service and the Consumer Council for Northern Ireland welcome the opportunity to respond to Ofcom's consultation on whether Saturday 26 December 2015 should be a universal service exception, as well as any Saturday falling on the 26th December in the future

The consumer advocacy bodies (Citizens Advice, Citizens Advice Scotland and the Consumer Council for Northern Ireland) work across the UK, representing consumers, conducting research and gathering evidence on postal user needs to deliver strategic projects that contribute to improving the operation of the postal market for all consumers. As the statutory consumer bodies, we also play a central role helping consumers in vulnerable positions, a fundamental safety net embedded into the UK's CEAR Act 2007.¹

We have reviewed the consultation and considered the reasons presented by Royal Mail in their request for a no service day. Accordingly, the consumer advocacy bodies have no objection to Royal Mail's application for an exception to its universal service obligations on the 26 December 2015.

Royal Mail has also requested that the Direction is applied in perpetuity to avoid the need for future applications in years when Boxing Day falls on a Saturday. The reasoning behind the Direction is based on a future projection of likely volumes and costs on this day.

We note that, after this year, the 26th December only falls on a Saturday in 2020, 2026 and 2037 and therefore, that costs and volumes associated with providing a service may change substantially, as well as consumers' needs. It is also possible that there may be changes to regulatory obligations, which could impact on the amount of time consumers are without a postal service. Given this uncertainty we do not consider that the exception should be applied in perpetuity.

It is noted that Ofcom has indicated that, if it allows the exception on the 26th December 2015, it would expect Royal Mail to ensure that its customer communications, including those aimed at business customers and access operators, make clear when deliveries and collections will be made in the period in question.

¹ Subsection (3) of the CEAR Act 2007 highlights the power of the Consumer Council to investigate or pursue complaints on behalf of vulnerable designated consumers
<http://www.legislation.gov.uk/ukpga/2007/17/contents>

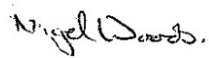
If Ofcom agrees to this exception, the consumer bodies would expect that communication to be clear, effective and wide reaching, with Royal Mail informing consumers and customers at least a month in advance that there will be no service between the 25th and 28th December.

We consider that it is important also that Post Office Limited should be given fair notice of arrangements so that Post Office counter staff can inform their customers, for example when Special Delivery items will be delivered. This is particularly important in light of research showing that over half of Northern Ireland consumers were unaware of last posting dates for Christmas 2013. This resulted in 5 per cent of Northern Ireland consumers posting Christmas cards and 7 per cent ordering online presents after 20 December².

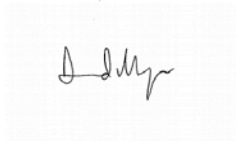
As a minimum we would expect that the information should be publicised in the following ways:

- Display notices on all post boxes;
- Display information publicising any arrangements in all post offices, delivery offices/enquiry offices;
- Display a notice on Royal Mail's website publicising the arrangements;
- Send a notice to all residential and business properties throughout the UK advising them of when collections and deliveries will be taking place over the Christmas period; and
- Provide advice on arrangements to all access operators.

Yours sincerely,



Nigel Woods
Policy Manager
Postal Services
Citizens Advice



David Moyes
Policy Officer
Postal Services
Citizens Advice Scotland



Kellin McCloskey
Head of Policy
Postal Services
Consumer Council (NI)

² Millward Brown Ulster - Consumer Futures Post Annual Mail and Post Office Satisfaction Survey 2014