Your response

Question	Your response
Question 3.1. Do you consider that Ofcom's overall regulatory approach remains appropriate for regulating postal services over the 5-year period (2022-2027)? If not, please explain the areas where you think changes should be made, with supporting evidence.	Confidential? – Y / N
Question 4.1: Do you consider that Ofcom's current approach to financial sustainability and efficiency of the universal postal service will remain appropriate going forward? If not, please explain what changes you think should be made, with supporting evidence.	Confidential? – Y / N
Question 5.1: Do you consider Ofcom's approach to the safeguard cap and ensuring affordability will remain appropriate going forward? If not, please explain what changes you think should be made, with supporting evidence.	Confidential? – Y / N
Question 5.2: Do you consider Ofcom's approach to the regulation of residential and business redirections services will remain appropriate going forward? If not, please explain what changes you think should be made, with supporting evidence.	Confidential? – Y / N
Question 5.3: Do you consider Ofcom's approach to regulating quality of service for key USO services remains appropriate going forward? If not, please explain what changes you think should be made, with supporting evidence.	Confidential? – Y / N
Question 5.4: Do you consider Ofcom's approach to regulating USO services, including access requirements, Special Delivery	Confidential? N

| Guaranteed by 1pm, Signed For and Meter mail will remain appropriate going forward? If not, please explain what changes you think should be made, with supporting evidence. | In relation to paragraphs 5.71 – 5.73 in the call for inputs document, where previously access operators have argued for the removal of metered mail from the universal service. Meter mail is of course a payment channel and does support USO and non-USO products, in the same way as stamps are a payment channel. Access operators have a threshold of collecting 250 letters therefore to state that the removal of Meter mail will lead to more competition does not stand up to scrutiny. They are not interested in collecting single piece mail. The majority of Meter mail users are from the SME community and value this channel with 14% using a franking machine versus the 2% that use bulk mail services provided by other postal operators. 85% of SME Meter mail users stated that this method of sending mail was "important" or "very important" to their business. In a community that has been hard hit over the past year making changes to the way they conduct their business would not be seen a supportive to their organisations.

From franking industry survey's, it has been found that the prime reason SME's use Meter mail is convenience, as for single piece mail there is little or no sortation and depositing the mail at a Post Office, Royal Mail collection, or inserting into a pillar box make the process simple.

Some franking machine users do generate larger volumes, and for convenience, management information and flexibility like to frank their mail.

The Meter mail industry and users have supported Royal Mail in its drive for efficiency over the past number of years. They have invested in new Mailmark compliant franking machines; a move that has been encouraged by Royal Mail which has now formally announced the decertification of legacy machines from December 31st, 2022. |

| | More generally, we believe that Royal Mail needs to set out its general approach to barcoding and likely policy and pricing around this. Whilst the trials of second-class stamp barcoding have been well publicised[1] the overall approach and wider strategy remains unclear.

This channel has been a feature of the postal market for almost 100 years and works very well for its users, it does not need to be further regulated or removed from the universal service. |
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| **Question 6.1: Do you think the parcels market is working well for all senders and receivers of parcels (such as online shoppers, marketplace sellers and/or small retailers)? If not, please explain what changes you think should be made, with supporting evidence.** | Confidential? – Y / N |
| **Question 6.2: What is the nature and extent of detriment (if any) that consumers may suffer in the C2X or B2C segments of the parcels market? Please provide your views with supporting evidence.** | Confidential? – Y / N |
| **Question 6.3: How effective are the existing consumer protection measures for users of parcel services, in particular CP 3? Is a change in regulation needed to protect users of postal services (as senders and recipients) and if so, what measures? Please provide your views with supporting evidence.** | Confidential? – Y / N |

[1] https://postandparcel.info/135325/news/parcel/royal-mail-to-be-one-of-the-first-postal-authorities-to-add-unique-barcodes-to-stamps/

Question 6.4: Are there any changes to the universal service obligations required for parcels, such as including tracking for First/Second Class services? If so, please provide your views with supporting evidence.	Confidential? N We would like to highlight the lack of a tracked parcel product within the Meter channel USO portfolio as Meter mail users are disadvantaged with the pricing of Special Delivery versus the products available via Click & Drop. Whilst Royal Mail Tracked 24/48 are not direct comparisons and fall outside the USO there has been an increase in the use of Signed For and Special Delivery during the pandemic and lobbying for a tracked 1st/2nd class product for parcels needs to be within the Ofcom scope of this call for inputs.
Question 6.5: Do you have any other comments on Ofcom's approach to regulating parcels? If so, please provide your views with supporting evidence.	Confidential? – Y / N
Question 7.1: Does the current scope of access regulation remain appropriate or should this be changed and, if so, how and why? Please provide your views with supporting evidence.	Confidential? – Y / N
Question 7.2: How well is our approach to access price regulation working in supporting access-based competition? Are there any improvements or changes that we should make? If so, please provide your views with supporting evidence.	Confidential? – Y / N

Question 7.3: Is our current approach to access regulation working well in delivering fair, reasonable and not unduly discriminatory terms of access, and are there any changes we should make? If so, please provide your views with supporting evidence.	Confidential? – Y / N