

Your response

Question	Your response
<p>Question 1: Do you agree with our proposed changes to the intermediary exclusion in the definition of ‘relevant parcels postal service’ and the deletion of intermediary exclusion for the definition of ‘relevant letters postal service’ in CPC1? Please include your reasoning and relevant evidence in your response.</p>	<p>Confidential - N</p> <p>Scotland’s Citizens Advice Network empowers people in every corner of Scotland through our local bureaux and national services by providing free, confidential, and independent advice. We use people’s real life experiences to influence policy and drive positive change. We are on the side of people in Scotland who need help, and we change lives for the better.</p> <p>Citizen Advice Scotland (CAS) has a duty to advocate on behalf of postal consumers in Scotland at both a local and national level. We welcome the opportunity to respond to this consultation on recovering consumer advocacy costs – Supplementary consultation on minor amendments to Consumer Protection Condition 1.</p> <p>CAS understands that postal operators who provide a relevant parcels postal service and who exceed the relevant turnover threshold of £350 million are liable to contribute towards Consumer Advocacy Body (CAB) fees, subject to certain exclusions. CAS notes Ofcom’s explanation that some stakeholders believe that the current exclusion relating to intermediaries can be interpreted differently depending on the operator, which does not align with Ofcom’s original policy intention.</p> <p>CAS supports the changes being proposed. We hope that these changes will provide the clarity that relevant parcels and letters postal services operators require. The fees that relevant postal service operators pay go towards funding CAS’s and other advocacy bodies’ work to ensure that consumers and SMEs are represented and heard by operators. Therefore, we welcome any changes that will provide clarity for all and ensure stability and future proofing of the system.</p>

Question 2: Do you agree with our proposed introduction of the bundled turnover allocation requirement in CPC1? Please include your reasoning and relevant evidence in your response.

Confidential? – N

CAS recognises that the postal services market is rapidly changing with a rise in the number of postal operators who offer a bundled service. We note Ofcom’s explanation that where a postal operator offers such bundled services, it is for that operator to allocate an appropriate proportion from its bundled services revenue to parcels delivery, that is representative of the cost of such delivery when submitting its relevant turnover to Ofcom.

CAS is supportive of Ofcom’s suggested change, which would make the inclusion of a reasonable proportion of bundled turnover a regulatory obligation, rather than simply a matter of guidance. Ensuring that there is clarity will ensure that there is consistency, reduce the likelihood of differing interpretations being taken by operators and strengthen the powers of Ofcom to investigate and enforce any related matters. Ofcom’s proposal will also help to ensure that CPC1 is future proof for any further changes to the parcel market which, given the constant changes in this market, is welcomed by CAS.

Question 3: Do you agree with our proposed change to the definition of ‘relevant parcel’ in CPC1? Please include your reasoning and relevant evidence in your response.

Confidential? – N

CAS notes that currently there may be a gap between the definitions of ‘relevant letters postal service’ and ‘relevant parcels postal service’. Specifically, that small, lightweight parcels, which are bigger than the dimensions of a standard large letter (353mm x 250mm x 25mm, as set out in the definition of a relevant letter) but less than 750g in weight, may not be covered by either of the aforementioned definitions. We support Ofcom’s view to remove the minimum weight of 750g from the definition. This will provide clarity for current and future stakeholders who may need to pay to CAB fees.

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