

## Your response

Question	Your response
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>Whistl welcomes the proposed changes. Whistl acts as a “true intermediary” in the Parcel and GLL market handing over its posting customer volumes to Royal Mail and a portfolio of other delivery companies for final mile delivery.</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>Whistl welcomes the proposed changes.</p>
<p><b>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.</b></p>	<p>Confidential? – N</p> <p>Small Lightweight items (parcels and GLL’s) are an area for regulatory scrutiny as part of the Ofcom 2022 Regulatory review. There are calls for these items to be classified separately and added into the Access Mandate.</p> <p>A recent S55 information request has been sent to a variety of postal organisations. The evidence emerging from this request will be used by Ofcom in assessing the competitiveness of this part of the market and the case for mandation.</p> <p>It is interesting to note Ofcom’s conclusion that <i>“given our knowledge of the parcels market, we did not deem this to significantly affect other parcel operators’ contribution”</i> suggesting Royal Mail have a dominant share in this part of the lightweight market.</p>

Whilst I am supportive of clarity of definition and the need to future proof these definitions.

With future regulatory alignment in mind in order to allow for the possibility of different regulatory outcomes for letters, business large letters, general large letters, light weight parcels and parcels perhaps Ofcom should consider separate classification for each class and map each one to one of the "Relevant Letters" or "Relevant Parcels" definitions.

Please complete this form in full and return to [gianpiero.roscelli@ofcom.org.uk](mailto:gianpiero.roscelli@ofcom.org.uk).