

Question 1: Do you agree that Ofcom should grant approval to Royal Mail for the Delivery to Neighbour service? If not please explain your answer. :

Ofcom should not grant approval to Royal Mail for the "Delivery to Neighbour" service in its current proposed form.

Whilst it is desirable for Royal Mail to offer "deliver to a neighbour," requiring (in Royal Mail's wording, a "responsibility") an addressee to display a badge "prominently" that he does wish for packages to be delivered to a neighbour is not appropriate.

Ofcom's assessment is very light in terms of consideration of the challenges of the approach, and appears to presuppose that it is desirable. Whilst, as an option which users can select, it has obvious merit, it is inappropriate to impose it on an "opt-out by notification" basis; it forces a choice between poor aesthetics and an unwanted delivery to a neighbour, and is undesirable where relationships with neighbours are tense.

Firstly, it forces an undesirable choice between altering the appearance of one's house, by displaying a sticker, or else permitting delivery to a neighbour. Not everyone wishes to display a Royal Mail sticker right at their front door but, to not do so is to agree to something which might be undesirable to that resident.

Secondly, there will be an inevitable social stigma of displaying prominently a sign that the customer does not wish for parcels to be redirected to neighbours. Whether correctly or not, there is a high likelihood that the display of such a sticker will be interpreted as one not trusting at least one neighbour. The approach requires a public display of an individual's judgement. This is an unnecessary addition to what may already be a fragile relationship.

Thirdly, the consultation paper does not address the issue of houses of shared occupancy. Where multiple tenants share one address, there may be no consensus as to whether personal parcels should be delivered to a neighbour; one approach may not suit all.

In terms of the approach being "opt-out," Ofcom, in paragraph 5.17, provides that:

"Royal Mail is the only major postal delivery company currently not permitted to deliver to a neighbour ... For example, TNT states in its terms and conditions of carriage and other services that "you or the receiver of a shipment may give special instructions to us to deliver the shipment to another location/person (being for example a neighbour and/or neighbouring address)"."

The wording evidenced by Ofcom in terms of TNT's practice clearly indicates an "opt-in" approach - that the sender or receiver "may give special instructions" permitting delivery to a neighbour. This is entirely different from an obligation to give Royal Mail special instructions *not* to deliver to a neighbour.

Whilst Ofcom's conclusion at 5.18, that "[i]f Ofcom does not grant Royal Mail approval to deliver postal packets to an addressee's neighbour, we consider that Royal Mail will remain at a competitive disadvantage" may be correct - no evidence is provided other than a short excerpt from TNT's terms in the preceding paragraph - this does not equate to the proposal of an "opt-out based on sticker" scheme, but rather permitting the operation of an opt-in scheme.

As such, Ofcom must reject the proposal in its current form. Unless Ofcom can adduce hard evidence that failure to permit an "out-out by sticker" approach would prevent the continuation of a universal postal service, a less harmful alternative must be considered.

No approach requiring the placement of a sticker on the house is appropriate - whether the sticker confirms that delivery is acceptable, or that it is not acceptable, the presence or absence of a sticker could be read as indicative of an addressee's view of his neighbours. Similarly, one sticker is insufficiently precise for residences with multiple occupancy, where individual addresses should be entitled to express their own preferences for parcels addresses to them, but the requirement of multiple stickers has clear aesthetic concerns.

As such, any approach must not require the placement of a sticker on the property. Determination as to whether delivery to a neighbour is permitted must be handled in a different manner - for example, postmen should carry with their "delivery not possible" cards a crib sheet showing the property number and its status, to know whether delivery to a neighbour is permitted or not. This would add minimal extra weight to the postman's bag, whilst preserving individual privacy. Where a signature is required for the item on an electronic device, the electronic device could act as the repository for this information, subject to technical feasibility of the systems currently being used.

It does not matter whether the system is "opt-in" or "opt-out", provided that the ability to make, and, subsequently, alter, one's choice is easy and free of charge.

Question 2: Are there other consequences following the roll out of the service across the UK that we have not included in our assessment? If so, please explain.:

As above.

Question 3: Do you have any comments on the scope and wording of the proposed Notification and approval:

As above.