

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. :

No. Although Royal Mail proposes to retain liability for mail delivered to neighbours on the same basis as other mail, I note that this currently excludes the following situations: (i) where the loss has not arisen due to any wrongful act done, or any neglect or default committed by an officer, servant or agent of Royal Mail while performing or purporting to perform his functions as such in relation to the receipt, carriage, delivery or other dealing with the item, (ii) where the loss has arisen due to circumstances outside the control of Royal Mail including acts of third parties with whom Royal Mail has no contractual relationship. These conditions need to be amended before Ofcom grants approval, and Royal Mail should (for the avoidance of doubt) also make clear that it accepts unlimited liability for any subsequent or consequential losses (e.g. fraudulent purchases made on a credit or debit card, documents used to support identity theft, deterioration of goods due to heat or cold or other extreme environment in excess of would normally be encountered by items whilst in the custody of Royal Mail).

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.:

Yes - see answer to question one.

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

No.