

Additional comments:

I am for the idea of alternative address delivery, but against the proposed method of doing so. Here is my rationale:

Opt-out stickers - the problems with having to display one are:

- 1) it is a manual (we must request a sticker, not provide) opt out (we should be able to opt-in)
- 2) it is a universal AND bilateral indication (I reject ALL neighbours mail AND do not permit my mail to be left with ANY neighbour) - this is unrealistic - some other mail providers simply allow us to specify which neighbour to use.
- 3) A sticker is publicly visible - so my neighbours will know my options, and as they are universal, the proposal can create more problems than it solves.
- 4) We are expected to take responsibility for indicating our preference and recording that - RM will not store ANY records of this. This is fundamentally wrong. it is 2012, technology is enabling amazing things and at a reduced cost, why are RM not doing the same? They could empower their post-people to know which neighbours to leave parcels with, and record opt-in/out without it being cumbersome or time intensive.

The lazy postmen will still deliver the mail to neighbour even with a sticker in-place, just as they do with redirected mail (I have proof as I have used that service 3 times, 3-6 months at a time, in 3 different post-codes and delivery offices, and on each occasion RM failed to redeliver all of the mail that they said they could).

THIS IS A STICKING POINT as it proves that royal mails business processes are and always have been ineffective, and that where a customer can pay for a selective mailing service (like mail redirection) they constantly fail to deliver the service. It is human to err, and where we are relying on postmen to deliver mail under pressure and time limits, to do the right thing, we have seen that nationwide, they often fail. Mail redirection is a specific instruction, and many, including myself, have experienced failure which results in mail being regularly delivered to the old (incorrect) address, despite instructions and paying for the service (and the situation is worsened as Royal mail claimed they could not refund me for the cost of the service that they did not deliver). There is nothing in this framework that protects against such failures. The consultation shows this.

The consultation ends 12/9/2012 and I received (3!) leaflets on the 30/8/2012 - so I had just under 2 weeks notice for a year long consultation!

This is a demonstration of royal mails incompetence in most things at the least, and an indication of their efforts to restrict the public from responding at the worst.

Mail is protected by law, and it seems that law will be ignored if mail can be simply abandoned with any neighbour without any real distinction.

section 1.7 of OFCOM's consultation document states:

"In developing this proposal, we have noted that other packet delivery services competing with Royal Mail are currently permitted to leave undelivered items with neighbours." - but what they fail to mention is that with other carriers, customer are able to specify WHICH neighbour the parcel can be left with, and these carriers are capable of fulfilling these instructions. This scheme by royal mail does not specify which neighbour items can be left with, and it cannot be done per delivery either.

Section 1.8 essentially states that their staff lie about attempting delivery, which is a top 10 complaint, and instead of re-training and changing that behaviour, they feel the answer is to allow that mind-set to continue and have the customers change their behaviour and allow their mail to be left with whomever lives near them as a solution.

There is no official & centralised record of opt-outs. Just a sticker, which is not being provided to all households automatically, but must be requested. If it falls off, becomes defaced etc. then this process fails further. Not only that, but there is no central record, as e.g. mail redirection (which still often fails due to the loose process that defines it and the human element that is ill-managed)

Why is this not being handled like mail redirection? where a customer can call RM and RM will find the customer record and see the detail of the service and instruction? (duration of the redirection, where it is redirected, preferences etc)

It seems that a customer would to 'tackle' RM for any damage, theft or loss of parcel, and tackle their neighbour for any delay (if they received my parcel today but were on vacation the next day), which would be very difficult and time consuming (thus, impractical and unworkable) in practice.

section 2.6 speaks of royal mail "notifying" OFCOM et al that they were extending the trial. It is interesting that they can just inform the regulators of this, but also, it would be good to know why they felt they needed to extend the trial. It's usually the case that the trial results did not reach the level they wanted, to support their ambitions, and looking at the concerns and objections shared by trialists, I am not surprised at all.

section 2.17 shows that the control group actually out-performed the trial group! The additional irony is that this is partly going to be due to the fact that royal mail has never operated a consistent service, so they couldn't even manage to have their trial group outperform their control group, and any gains/losses in either are mainly down to the idiosyncrasies associated with each area/sorting office/staff set.

The scheme does not allow the specification of a "neighbour" - I have 4 neighbours directly adjacent to me (1 below, and one to the left and 2 to the right) but of course the leaflet and website of royal mail does not allow me to specify which I'd like to use.

If I want my mail to go to my neighbours below, but not either side, or one of them, there is no way to manager that.

There is no mention of whether neighbours farther down the road can be chosen - the whole street/block of houses are my neighbours!

section 4.6 states: "The decision as to whether to leave an item with a neighbour is at the discretion of the postman/woman" - leaving the decision with the post person, a single point of decision and failure, is a flaw in process design. This need to be customer driven, but instead is a lazy approach to fulfilling RM's needs and not that of the customer.

4.7 describes the 'rational' of determining whether to leave a parcel with a neighbour, but the real criteria are not referenced. Do I have a relationship with that neighbour? is it a positive one? can they be trusted? do they have a criminal record for relevant offences? Do I have a preferred neighbour? Do they WANT to receive MY mail (which may be independent of their wishes to receive mail from other neighbours), etc.

Reading on from section 4.7, the trend continues - nobody can say the trial was a complete success, as there are so many issues indicated, and the same problems the service has always had are still present, and directly affected the accuracy and quality of the trialled service (Assuming we all agree that the international best practice of aiming for success beyond 99% is plausible and should be the aim). The sensitive concerns customers have were not addressed by the trial, and instead were 100% proven to occur in the running of the trial (i.e. cards not being left, etc)

As such, I am wholly against this proposal (as written), and I also do not give my legal permission for my mail to be left with a neighbour, and I do not feel that sticking a sticker on my door is an effective way of managing my opt-out and that it exposes my preference publicly which could cause tensions and even a breach of my privacy (Privacy and data protection act).

I do understand the benefits of not having so many items of mail returned to depot for RM - after all, I hate having to visit the offices during my time during the week to collect mail, especially when the opening hours are often unfriendly and the queues long.. but, as in all things: it is not what we do that is important, but also how we do it. This proposal is too simplistic in its design and does not have any safeguards in place to ensure it is not abused or controlled.

I would support a similar proposal where:

- 1) opting in was the default status for each house-hold (or opting out was simpler and didn't involved a physical & public sign)
- 2) we are able to specify which neighbour could take our mail (whom we would also accept mail), or indicate 'any' (as many may do)
- 3) no publicly displayed stickers or other indication were required, as this over simplified method is not a holistic solution and causes the aforementioned issues

If this proposal is forced through to unilaterally affect all customers with the current lack of safeguards and service customisation, I will be forced to legally reject this action, and join a 'class-action' type legal action with the many others whom feel this change to the fundamental management of our mail service and the security of our mail is flawed in design and detrimental to customer service and satisfaction.

After all, if we have no say on the price increases and delivery times as RM feel fit, then surely we must have control over whom receives our private mail, for this to continue to be called a service?

OFCOM, please lead Royal mail effectively - allow them to do as they wish but ONLY if they do so in a way that addresses all of the issues.

Let's not continue to allow RM to be "competitive" at the cost of service and customer quality and satisfaction.

It's not what we do, but how we do it that counts.

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, as the way in which this will be done is flawed and contrary to good customer service and satisfaction, as detailed in my mail comments.

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, as detailed in my mail comments.

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

Yes, as detailed in my mail comments.