

Additional comments:

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. :

I don't agree that Ofcom should grant approval to Royal Mail for its "Delivery to Neighbour" scheme. I object to the way in which what is effectively a private company is being allowed to coopt the population into its workforce, with those who object being obliged to opt out by having to affix a sign to their home. I would have no objection to the scheme if membership were by opting in.

The Royal Mail is a limited company with the shares owned by the state. The current government and its predecessor have made no secret of their intention to privatise the company once its debts and liabilities have been transferred to the state: legislation to privatise the company was enacted earlier this year, and the huge liabilities of Royal Mail's pension fund have been moved to general state debt in preparation for privatisation. The Royal Mail's "Delivery to Neighbour" scheme should be viewed in this context: it is being hurriedly introduced now to increase the company's value on privatisation, and because Royal Mail and its owners know that the scheme, which presumes the unpaid participation of all householders in the Royal Mail's delivery system, would be even more objectionable when the company is privately owned.

Since the Royal Mail is being fattened for privatisation, I think it's fair to ask how the "Delivery to Neighbour" scheme would be viewed if it were proposed by a private courier such as City Link or DPD. Would those companies be allowed to oblige householders to opt out of participation in their schemes? Given the plethora of couriers, the houses of non-participants would eventually be festooned with opt-out stickers of the kind that Royal Mail are set to introduce. And why stop with couriers: wouldn't it be economically beneficial if companies that operated a country-wide delivery service such as Asda or Tesco could oblige refuseniks to opt out of having their shopping delivered to their neighbours -- or their neighbours' shopping delivered to them? My point is that, now that its days as a publicly owned business are numbered, there is nothing about the Royal Mail that should allow it to receive special treatment when it proposes to induct householders as its unpaid workers.

My experience of the Royal Mail's willingness to honour opt-outs is not good. The Royal Mail currently operates an opt-out over its so-called "Door-to-Door" service of bulk deliveries of unaddressed junk mail. The Royal Mail has repeatedly ignored my attempts to opt out from that scheme, presumably because it's in the company's commercial interest to disregard my wishes. The opt-out aspect of the "Delivery to Neighbour" scheme is comparable to inertia selling, which is illegal. If, as the Royal Mail claims, the scheme is so popular, the company should have no objection to your ruling that it should require participants to opt in.

The government and the management of Royal Mail both stand to gain from the privatisation of the company, and I think they're counting on Ofcom to equate the company's interest with the public interest when it comes to boosting the value of the Royal Mail in preparation for its privatisation.

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.:

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