

Additional comments:

I object to having to opt out and very strongly object to being forced to disfigure my front door with an opt out sticker that appears to have been compulsory during the trial. You should insist upon an opt in and should ensure that door stickers are not compulsory. The opt out of Royal Mail delivered junk mail operates without a door sticker and just requires a written opt out. Why should this be any different?

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. For the reasons given above and for many other more serious reasons that will be made in a further submission that I will make. I have only just learned today, 17 July 2012 about this proposal and consultation.

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 shown above and many other more serious consequences that will be raised in a further submission that I will make. I have only just learned today, 17 July 2012 about this proposal and consultation.

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

Yes. These will be made in the further submissions mentioned above

2nd submission

Further to my online submission about the proposed inclusion of Recorded Signed For in this scheme I wish to add the following.

Currently the online Track and Trace will state for example 'Your item with reference AP622894489GB was delivered from our GLASGOW Delivery Office on 20/08/12'. This does not give the delivery address, presumably because of the current rules, and it can be assumed that this is the address to which the item was sent.

If this remains the same under the proposals a sender will have no knowledge of where the item was delivered and can make no assumptions.

Even if a signature is obtained these are often impossible to decipher, especially when signed onto a hand held electronic device but in any case will be meaningless to the sender. This also assumes that a signature is obtained that at present is not always the case. Sometimes the signature is obtained but is not scanned into the system after delivery.

Remember that very many of these items are confidential and often sent without the knowledge of the addressee.

Will any Royal Mail record exist as to the place of delivery of Recorded Signed for Items? A card may or may not be put through the addressee's letterbox but this will in any case remain in the possession of the addressee. At present it has to be produced at the delivery office with proof of identity and is retained by them.

These are yet further reasons why you should refuse to allow the inclusion of Recorded Signed For items.

Could I also add to my first submission for clarification that, not only should it be opt in, but that the sticker should be an opt in sticker. Presumably the opt inners will not object to defacing and disfiguring their front door whereas those of us who do not want to opt in do object very strongly.

To insist that we do this is arrant cheek and an abuse of the Royal Mail monopoly position.

3rd submission

Additional comments:

Have you considered the provisions of Section 7 of the Interpretation Act 1978, the provisions of the Recorded Delivery Services Act 1962 and the provisions of the many other statutes and statutory instruments that have 'deemed service' provisions?

Have you considered the legal implications of leaving such documents with neighbours and the legal complications that could arise from this?

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 above.

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 above.

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

Yes. As above

4th submission

Additional comments:

This will have to be my final submission due to the imminent closing date.

It is regrettable that the woeful lack of publicity about this scheme and the so called consultation exercise has forced me to make piecemeal submissions and given me little time to identify all of the issues, make my own research and to submit my views in a structured way.

This submission deals with the so called consultation exercise itself that I believe to be flawed and challengeable.

1. My first comment that has to be the theme running through all others is that Ofcom have already made their decision. The so called consultation document says, for example:

1.9 'Ofcom therefore proposes to agree to Royal Mail's application. The purpose of this consultation is to seek views from stakeholders before reaching a final decision.'

Whilst there has to be some recognition for Ofcom's honesty this is not genuine consultation.

True consultation is when the adjudicator comes to the table in an impartial manner, with no preconceived ideas, willing to listen to all stakeholders and then weigh up the various submissions in order to reach an objective and balanced decision. I believe that Ofcom have now shown themselves to be incapable of doing this and acting as a regulator in this issue.

The fact that Ofcom have allowed Royal Mail to commence the 'roll out' even before the consultation is ended gives credence to this view.

2. Ofcom appear to have reached their proposal to agree to the application on a flawed prospectus.

By their own admission stated, for example, in paragraphs 5.7 to 5.12, in the trial the take up was low, the amount of items left with neighbours was extremely small and awareness of the trial and/or its details was also extremely low. This in itself was with a small sample of households

This makes it all the more important to engage in well publicised, impartial and meaningful consultation before reaching any view at all. This I believe Ofcom has failed to do.

It is surprising and worrying that Ofcom have taken this view on such data.

3. Ofcom appear to have reached their view entirely on the 'evidence' provided by Royal Mail and appear to have accepted its validity and accuracy without question.

They do not appear to have made any objective investigation into current, policies, practices, operations and procedures before reaching their view.

They do not appear to have determined any evidence for themselves and appear to have failed to identify the obvious issues for themselves. Nevertheless they propose to agree to Royal Mail's application.

They appear not to have taken into account the results of TV investigations such as that carried out by BBC's Watchdog nor trawled the internet where they would have found much information about the public's view of Royal Mail.

It is hoped that they rectify these apparent omissions.

4.Ofcom do not appear to have reviewed Royal Mail's website or scheme leaflet or required Royal Mail to submit this in advance for approval.

They have allowed these to be published and distributed containing what I allege to be inaccurate and misleading information.

5.Despite the Ofcom policy that 'We believe it is important for everyone interested in an issue to see the views expressed by consultation respondents. We will therefore usually publish all responses on our website, www.ofcom.org.uk, ideally on receipt.' none of the responses have yet appeared on the website.

6.That this little publicised consultation has taken place at the peak of the holiday period and ends at the start of the bank holiday weekend is highly questionable.

It has not only taken place whilst the public are on holiday and Ofcom staff are on holiday but has occurred at a time when attention has been diverted by such things as the London Olympics.

In the light of these issues and many others that I could probably identify if I had the time, I believe that this so called consultation should be extended so that stakeholders can be accurately given all the facts and issues, given time to fully consider them and then to make their views known.

The roll out should be delayed until real consultation has been carried out without the indecent haste to have this in operation for Christmas 2012.

If Christmas 2012 was the aim then this should have been started earlier and carried out in a more transparent manner.

I believe that this is deliberately calculated to 'bounce' Ofcom and the stakeholders.

Will Ofcom be tested and found wanting?

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. See above.

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 above.

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

As above