

Additional comments:

I believe that that the "competitor" argument is deeply flawed because it is not a proper comparison. I refer to:

1. Paragraph 2.8 on page 4 that says "It also noted that it would bring it in line with its competitors who are all able to leave items with neighbours."

2. Paragraphs 5.17 and 5.18 on page 20 that say

5.17 Royal Mail is the only major postal delivery company currently not permitted to deliver to a neighbour as part of its standard delivery practice and its application is part of an ongoing process to bring its terms and conditions more in line with other delivery companies who are not subject to the same restrictions. 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)";

5.18 If 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 (although Royal Mail itself has not identified this as a principal reason for its application). We do recognise, however, that this is likely to be a smaller factor in relation to Royal Mail's competitiveness with other operators compared to other factors which have been identified in previous reviews of postal services.

3. Paragraph 5.37 on page 23 that says:

5.37 We consider that granting an approval to Royal Mail to allow it to deliver certain postal packets to an addressee's neighbour when the addressee is not present at the destination address would be:

• objectively justifiable because it would place Royal Mail on a level playing field with its competitors and offer customers greater choice in terms of the delivery of items;

In the majority of cases items delivered by non Royal Mail carriers are items that are expected, usually because they are things that have been ordered from a supplier or are not unsolicited. In the majority of cases items delivered by Royal Mail arrive unexpectedly. This is either because the addressee was not aware that they had been sent at all or did expect the item but at some unknown future point. This is particularly the case with Recorded Signed For items that

will be the subject of a further submission as it is a concern in itself. These items can be normal post that will not go through the letter box as well as Recorded Signed For.

It follows that if an addressee does not know an item has been sent then they cannot know that it has not been received. This problem will be made worse by this proposal especially if the postal staff fail to deliver cards. They will have greater incentive to fail to leave a card or to forget to do this since their workload will be increased and they will have to revisit the house once they have found a willing and able neighbour.

In addition there has been, and probably still are, dishonest postal staff and also those who have headed mail that they were too lazy to deliver. This proposal is a charter for those staff and could increase the likelihood of dishonesty or laziness.

There are also "neighbours" who are dilatory or dishonest!

Your TNT example is erroneous since that is an Opt in system as it is with other carriers. Royal Mail should also have an opt in system in the interests of customers and "a level playing field";

<https://stakeholders.ofcom.org.uk/consultations/royal-mail-1-delivery-neighbour-1> or...
18/08/2012

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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. Not with an opt out system for the reasons given above, below and in my other submissions.

I may not object to an opt in system but would need to see the proposals before deciding.

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.

This proposal will also further muddy the waters when mail goes astray, especially with the Royal Mail lost and damaged post policy that already provides poor customer service in that they make no attempt to locate "lost" mail and have an assumed loss policy. The assumed loss is after 15 days by which time the trail has gone cold.

With reference to Paragraph 4.5 on page 12, I believe that you should review the current system that is in operation and require amendments since I believe that it is not adequate now let alone for this purpose. You should require them to attempt to locate and recover "lost" mail, especially that left with a neighbour, if this goes ahead.

You have not adequately dealt with who takes responsibility if an item is lost or damaged whilst at a neighbour's house or if there is a dispute as to where the item was damaged?

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

Yes. As set out above.