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#### Post Workshop 3 Survey

#### Introduction

Thank you for participating in the third workshop organised within the framework of the Prospective Study on the Postal Sector, being carried out by RPA and RAND. This survey is aimed at workshop participants (and any other interested respondents) and aims to collect stakeholder views on the potential postal sector issues and market failures that may arise in the five future scenarios developed under the study and potential solutions to address these issues/market failures. The scenarios developed under the study are summarised below:

- Scenario 1 The new normal (baseline): Aspiration for progressive growth and innovation is hampered by megatrends. Progressive change is slow and many existing trends continue.
- Scenario 2 Poly-crises escalate ('wild-card' challenge scenario): Fracturing of the climate, markets and sociopolitical order put pressure on postal demand and operations from many angles.
- Scenario 3 Platforms redefine post: Data-rich multinational tech platforms grow in size and scope, moving sideways into postal value chains and delivery markets.
- Scenario 4 Post-carbon discipline: Environmental concerns are the primary consideration and drive accelerated greening and other measures to reduce the environmental impact.
- Scenario 5 Social value post: Universal Service Provision (USP) is reconceptualised and USPs take on social functions

This survey consists of two parts. The first part elicits views on the issues/market failures identified under more than one scenario. Please note that the term 'market failure' is used in this study in a broad sense that also encompasses the failure to perform societal functions and provide postal services. The second part aims to collect views on a wide range of potential policy solutions.

Please complete this survey by 19th July 2024.

Please note that your responses will not be published. Only aggregated responses will be published to ensure anonymity.

If you would like to provide additional explanations on your responses in interview with the study team or exchange on this topic by email, please get in touch with us using the following email address: <a href="PostalSector">PostalSector</a> Study@rpaltd.co.uk

#### **Definitions:**

improvement of quality of service **USO:** Universal Service Obligation **USP:** Universal Service Provider Name **MULLER Martin** Email address martin.muller@posteurop.org Organisation name PostEurop EU member states Other If other, please specify Link to our members: https://www.posteurop.org/member/ Stakeholder type Universal service provider Union Other service provider e-commerce retailer National Regulatory Authority Academic Ministry/government department Other

**PSD:** Postal Services Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the

#### Section 2: Most salient and cross-cutting issues and market failures

The most salient and cross-cutting issues and market failures for which the study is collating an inventory of potential policy solutions are summarised below. These are primarily issues that have been identified as possibly arising under two or more scenarios.

- Issue 1: Increased net costs of the universal service obligation caused by lower efficiency and profitability of the universal service, due to further reductions in letter volumes and increase in net unit costs.
- Issue 2: Lower effectiveness (ability to perform its function and deliver on its objectives) of the universal service due to reductions in scope and features in order to respond to cost pressures and shifting user preferences.
- Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of growing e-commerce.
- Issue 4: Decrease in quality and innovation, as well as increase in prices, for both letters and parcels, as a result of increased market concentration and barriers to entry.
- Issue 5: Distortion of the level playing field in the wider postal sector caused by the expansion of ecommerce platforms into delivery services.
- Issue 6: Reskilling costs/needs as a result of market developments and the changing role of USPs; deteriorating employment models and conditions.
- Issue 7: Increased net environmental emissions as a result of the growing parcel volumes and reduced capacity to invest.

#### Q1: Do you agree that this issue is likely to arise in the EU postal sector over the next 10-20 years?

Issue	Yes/no
Issue 1: Increased net costs of the universal service obligation caused by lower efficiency and profitability of the universal service, due to further reductions in letter volumes and increase in net unit costs.	Yes/no Yes
Issue 2: Lower effectiveness (ability to perform its function and deliver on its objectives) of the universal service due to Member States's varied reductions in scope and features in order to respond to cost pressures and shifting preferences of typical users.	Yes/no No
Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of changing universal service scope and features in the Member States and growing e-commerce.	Yes/no No
Issue 4: Decrease in quality and innovation, as well as increase in prices, for both letters and parcels, as a result of increased market concentration and barriers to entry.	Yes/no No
Issue 5: Distortion of the level playing field in the wider postal sector that may potentially arise as a result of the expansion of e-commerce platforms into delivery services.	Yes/no Yes
Issue 6: Reskilling needs as a result of market developments and the changing role of USPs; deteriorating employment models and conditions.	Yes/no No
Issue 7: Increased net environmental emissions as a result of the growing parcel volumes and reduced capacity to invest.	Yes/no No

#### Q2) What would be the impacts of these issues on your organisation or your members?

Issue	Impact direction	Impact magnitude (5: highly significant impact, 1: No impact at all)	Additional remarks
Issue 1: Increased net costs of the universal service obligation caused by lower efficiency and profitability of the universal service, due to further reductions in letter volumes and increase in net unit costs.	Impact direction  Negative	Impact magnitude	Additional remarks
Issue 2: Lower effectiveness (ability to perform its function and deliver on its objectives) of the universal service due to Member States's varied reductions in scope and features in order to respond to cost pressures and shifting preferences of typical users.	Impact direction  Neutral	Impact magnitude	Additional remarks
Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of changing USO scope and features in the Member States and growing e-commerce.	Impact direction  Neutral	Impact magnitude	Additional remarks
			Additional remarks  There is no correlation between market

Issue 4: Decrease in quality and innovation, as well as increase in prices, for both letters and parcels, as a result of increased market concentration and barriers to entry.	Impact direction  Neutral	Impact magnitude	concentration and quality. The parcel market is a very different market and highly competitive. On letters we compete with digital alternatives, so please take the whole market into account when looking at market concentration
Issue 5: Distortion of the level playing field in the wider postal sector that may potentially arise as a result of the expansion of ecommerce platforms into delivery services.	Impact direction  Negative	Impact magnitude	Additional remarks
Issue 6: Reskilling needs as a result of market developments and the changing role of USPs; deteriorating employment models and conditions.	Impact direction  Neutral	Impact magnitude	Additional remarks
Issue 7: Increased net environmental emissions as a result of the growing parcel volumes and reduced capacity to invest.	Impact direction  Neutral	Impact magnitude	Additional remarks

he future? If you believe that additional significant issues are missing from this list, please provide							
additional information below.							

#### Section 3: Potential policy solutions

This section of the survey requests your opinions on the potential policy solutions that could be used to address the issues identified in the previous section.

If you believe that a policy solution would only be effective in combination with another, please state this in the "additional explanations/remarks" column.

### Issue 1: Increased net costs of the universal service obligation caused by lower efficiency and profitability of the universal service, due to further reductions in letter volumes and increase in net unit costs

Objective 1.1: improve USPs' financial performance and reduce the net cost of USO

Sub-objective 1.1.1: Reduce USO costs (both unit costs and the overall net cost of USO)	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Change the scope of USO in the PSD, e.g. exclude all parcels, exclude all items over 2 kilograms, exclude B2x letters, etc.	Answer 3	Answer 4	Yes/no Yes	Additional explanations/remarks  Effectiveness would be different in MS. There has to be maximum flexibility at MS level to make a decision which suits best the national circumstances.  Bulk parcels should be excluded as it is a very competitive market.  Policy makers need to realise that products not commercially viable that are no longer offered as part of the USO, will most likely disappear from the market
Change delivery frequency and add/change speed-related features of USO in the PSD, e.g. reduce delivery frequency, refocus from delivery frequency to speed of	Answer	Answer	Yes/no	Additional explanations/remarks  Highly effective: Based on national circumstances.  However, these are measures already implemented in several MSs. As such, this policy solution is

delivery for domestic mail, extend speed for cross-border items, etc.	5	5	No	not particularly future looking in the context of increasing net costs due to persistently falling letter mail volumes.
Relax the affordability principle and strengthen the cost-orientation principle, e.g. by providing definitions in the PSD or separate guidance for the terms "affordable" and "cost-oriented" that are geared towards financial sustainability of USOs	Answer 3	Answer 4	Yes/no Yes	Additional explanations/remarks  Effective: Relaxing the affordability is enough.  Not effective: Strengthening cost orientation is not needed as it already exists. cost orientation will become less important relative to the affordability principle.  However, it should also be observed that relaxing the most cost-driving features of the USO service requirements is a far more effective policy in order to limit/reduce net costs than relaxing the affordability and/or cost-orientation requirements
Reform the delivery location requirement, e.g. add other delivery locations to Article 3(3) of the PSD after "one delivery to the home or premises of every natural or legal person" or add examples of "appropriate installations": communal letter boxes, parcel lockers, post offices, PUDOs, other shops, etc.	Answer 4	Answer 3	Yes/no No	Additional explanations/remarks  Moderately effective or Highly effective depending on national circumstances. Flexibility at MS level is important.
	Answer	Answer	Yes/no	Additional explanations/remarks  Highly effective

Reduce administrative burden for USPs, e.g. by reducing reporting obligations	3	5	No	
Refocus the USO from all users on vulnerable users only and leave provision of services to non-vulnerable users to market forces	Answer 2	Answer 3	Yes/no Yes	Additional explanations/remarks  This is very difficult to answer without a clear understanding on the definition of vulnerable users, which will be different in MS.  Definition of vulnerable users has to be left on MS, and should not be defined in PSD.  Maintaining flexibility at the MS level to define and identify vulnerable users is crucial to tailor the USO to the diverse needs and circumstances of different countries.
Oblige or encourage USOs to propose options to NRAs for cost reductions where unit costs rise by a certain percentage	Answer 1	Answer 1	Yes/no Yes	Additional explanations/remarks  USPs are continuously looking for cost reductions in order to make the USO as efficient as possible.  This could lead to potential increase of administrative burden and loss of efficiency due to a long regulatory process.
Encourage use of price differentiation to steer consumers to more cost-efficient services, e.g. slower services or out-of-home delivery	Answer	Answer	Yes/no	Additional explanations/remarks  Price differentiation can be effective if market driven, not as a policy; the policy should be, instead leaving

	1	1	No	flexibility to the market to be able to differentiate.
Other (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Yes/no O Yes No	Additional explanations/remarks

lf y	you have proposed other potential policy solutions, please specify them below.				

### Issue 1: Increased net costs of the universal service obligation caused by lower efficiency and profitability of the universal service, due to further reductions in letter volumes and increase in net unit costs

Objective 1.1: improve USPs' financial performance and reduce the net cost of USO

Objective 1.1. improve OSFS financial performance and reduce	be the fiet cost of ooo			
Sub-objective 1.1.2: Increase USPs' income/ better compensate them for the net cost of USO	Is this policy option likely to be effective in terms of addressing the issue /challenge above? Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Strengthen the obligation of Member States to fully reimburse the net cost of USO whenever it is incurred, with specific deadlines for reimbursement	Answer 5	Answer 5	Yes/no No	Answer  Especially if the compensation is managed by the state. This would help address financial burdens on postal services.
Reform the compensation fund system, e.g. by excluding the USP from contributing, including a template for the design of a compensation fund in the PSD (including which types of entities contribute, such as the delivery services of e-commerce platforms), etc.	Answer 2	Answer 2	Yes/no No	Answer  The current compensation fund system is problematic, as it often results in postal services effectively paying for their own subsidies. Reforming could only be effective if the main contribution for the funds comes from public funding, with a less insignificant (up to one third) contribution from all market players in the postal sector (not only those providing services within the scope of US).
				Answer

Remove the compensation fund option from the PSD and discourage or prohibit its use	Answer 4	Answer 5	Yes/no No	Only when there is another mandatory compensation mechanism, or reimbursement system of net cost is in place
Develop a more detailed definition of unfair financial burden and add to Article 7(3) of the PSD. Use an EU-level process to develop the definition and provide specific criteria and thresholds.	Answer 3	Answer 3	Yes/no No	Answer  To ensure fair compensation and support for postal services, though the specifics need careful consideration.  It should not make the calculation even more complicated than it is now. There is a risk that a more detailed definition in combination with specific criteria and thresholds will make the calculation and "proof" of burden - and ultimately the whole net cost compensation mechanism - even more complicated, less dynamic and less adoptable to the actual circumstances.
Review and further develop the net cost of USO calculation method, e.g. in Annex I of the PSD, an EU guidance document or regular exchange of experiences in the ERGP	Answer 3	Answer 4	Yes/no No	Answer
Make it easier to provide state aid for postal services, e.g. by establishing specific (higher) thresholds for postal services for notification to the Commission in the Framework for State aid to Services of General Economic Interest	Answer 5	Answer 5	Yes/no No	Answer  Would streamline funding and support for postal services, making it easier to manage and less bureaucratic

Make EU funding available for reimbursing the net cost of USO, e.g. for intra-EU cross-border net cost of USO or for the social functions performed by USPs	Answer 4	Answer 3	Yes/no No	Answer  Funding for net costs needs to be done for all USO costs. Different systems for different parts of the USO will only increase the administrative burden.
Expand the USO definition to include other Services of General Public Interest and provide financial compensation to USPs for the provision of these services at their points of contacts, thus spreading the cost of operating points of contact across a wider range of income streams.	Answer 2	Answer 2	Yes/no No	Answer  Implementation of such policies in MSs does not require changes in the PSD, nor should it be installed in the PSD.
Other (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Yes/no O Yes No	Answer

If y	f you have proposed other potential policy solutions, please specify them below.						

### Issue 2: Lower effectiveness (ability to perform its function and deliver on its objectives) of the universal service due to Member States's varied reductions in scope and features in order to respond to cost pressures and shifting preferences of typical users

Objective 2.1: Increase Member State flexibility but ensure that user needs are met, barriers to trade do not emerge and there is legal certainty

Sub-objective 2.1.1: Accommodate different development trajectories of the Member States and/or include USP financial sustainability as a reason for derogations from USO scope and features	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Allow generalised derogations in Article 3(3) of the PSD but set rigid minimum USO scope and features (e.g. letter delivery no less than once a week and parcel delivery daily)	Answer 2	Answer 3	Answer	Answer  Setting rigid minimum requirements may not be future-proof and could lead to operational challenges as needs evolve. Flexibility is limited, potentially making it impractical for some MS.
				Answer  Needs tests are challenging to conduct accurately and can result in unrealistic expectations from users who may

Allow generalised derogations but only when domestic user needs tests have been met (these tests could be determined in the PSD)	Answer 1	Answer 2	Answer	desire the same level of service at lower costs, creating financial viability issues for postal services. Any users need should be weighed against financial viability. Tests/assessments should be left to MSs to decide, not be determined in the PSD
Allow generalised derogations but only when user needs for <u>cross-border</u> postal items have been met (these tests could be determined in the PSD)	Answer 1	Answer 2	Answer	Answer  Concept of meeting user needs for cross-border items is vague and difficult to implement, given the variability in current transit times and existing service levels across borders. User needs always needs to be weighed against financial and operational viability
				Answer

Allow generalised derogations but only where a faster non-USO service is available in the whole territory of the Member State	Answer 2	Answer 2	Answer  Yes No	Such a policy should be left to each MS itself to consider, not determined in the PSD.
Allow generalised derogations but only when user needs for cross-border postal items have been met (these tests could be determined in the PSD)  To complement the two options above, Define criteria to adapt minimum requirements (e.g., legal adaptations at EU level) based on procedural requirements for a minimum level of USO (revised minimum requirements, such as reduced delivery frequency) and methods (for example, require Member States to periodically assess user needs (receiver, not just sender) and level of competition to determine the scope and features of USO and provide criteria for determining minimum service scope and standards	Answer 1	Answer 1	Answer  Yes  No	Answer  In cross-border services, quality depends on features on both countries
Require Member States to analyse the effectiveness of market-based approaches and procurement for USO designation	Answer 3	Answer 3	Answer	Answer  No requirement needed, leave the choice to the MS whether this is necessary or not
Revise Annex II by loosening quality standards for intra-Community cross-border mail to give more freedom to reduce delivery frequency and speed for all mail, e.g. by introducing a slower target with high quality standard, establishing differentiated Member State-Member State specific standards or deleting Annex II altogether	Answer 4	Answer 5	Answer	Answer  Revision, or a deletion could possibly be effective but this needs further assessment.
Ensure sufficient service for users of cross-border services, e.g. by establishing a common EU				Answer  This will unproportionately

framework for regularly assessing the needs of cross-border users in a Member State and ensuring that the approaches in other EU Member States are sufficient to contributing to the meeting of these needs	Answer 2	Answer 3	Answer  Yes No	add administrative burdens on regulators and operators.
Provide greater flexibility by product and user type, e.g. introduce differentiated USO features (e.g. delivery frequency) in the PSD for letters vs parcels, business users vs private users, bulk vs single piece, etc.	Answer 3	Answer 2	Answer  Yes  No	More flexibility for MSs themselves to define their USO service requirements in line with national circumstances is needed. Introducing differentiated USO features in the PSD will only restrict MSs' flexibility
Reduce regulatory divergence by changing the USO requirements in the PSD to a one-size-fits-all /full harmonisation approach, thus avoiding barriers to trade from a patchwork of regulatory regimes by reducing the possibility of the Member States to derogate from USO scope and features.	Answer 1	Answer 1	Answer	There is no "one-size-fits-all"-solution due to important differences between member states in terms of USO costs, user needs, digitalization, etc. What is needed is flexibility to MS in defining their USO in line with national circumstances, not

				less flexibility by harmonized service requirements defined in the PSD.
Others (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

lf y	f you have proposed other potential policy solutions, please specify them below.					

Issue 2: Diverging paths of Member State approaches to USO and lower effectiveness (ability to perform its function and deliver on its objectives) of the universal service due to reductions in scope and features in order to respond to cost pressures and shifting preferences of typical users

Objective 2.1: Increase Member State flexibility but ensure that user needs are met, barriers to trade do not emerge and there is legal certainty

Sub-objective 2.1.2: Ensure careful market monitoring to identify emerging market failures	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Ensure careful market monitoring to identify emerging market failures	Answer 1	Answer 3	Answer	Answer  Market monitoring is already in place, particularly for USO and parcels. This proposal could increase regulatory burden and costs without clear benefits, and may grant NRAs more power, leading to more regulation instead of the desired flexibility.
Strengthen competences of NRAs to monitor terminal dues in intra-Community flows and agreements between providers related to tariffs for the delivery of incoming postal items	Answer 1	Answer 2	Answer  Yes  No	Providers must comply with competition law. No need for additional regulatory monitoring nor regulation. The parcel market is highly competitive, incl. cross-border parcel delivery.  Regulatory monitoring and intervention will stifle market dynamics and weaken USP's ability to adapt its operations.  This could lead to an increase in administrative burden without real added value
Require mandatory public consultation open to all (at least at the national level) whenever a reduction in USO scope and features are considered	Answer 3	Answer 4	Answer	Answer  This is already part of the policy making process

Others (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer
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If yo	f you have proposed other potential policy solutions, please specify them below.						

# Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of changing USO scope and features in the Member States and growing e-commerce

Objective 3.1: Ensure that vulnerable users continue to receive services and safeguard territorial cohesion

Sub-objective 3.1.1: Ensure careful market monitoring to identify emerging market failures	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Differentiate USO features between vulnerable and non-vulnerable users	Answer 2	Answer 3	Answer  Yes  No	Answer  This is difficult to assess without a common understanding of vulnerable users. Vulnerable users will be defined differently in MS  Differentiation shall be made at MS level depending on national circumstances. Hence, the appropriate operational solutions to ensure connectivity and accessibility should be decided by each operator and/or Member State.
Introduce specific requirements in the PSD for vulnerable populations, e.g. home delivery for recipients with restricted mobility, stronger affordability principle for low-income users, equal access to postal services for users without the Internet to users with Internet access (e.g. when arranging redelivery)	Answer 2	Answer 1	Answer  Yes No	Answer  Due to varying national circumstances and the dynamic nature of the vulnerable user group.

Ensure there is always an up-to-date definition of vulnerable users and their reliance on postal services, e.g. via ERGP or national NRA assessments, use data for USO targeting	Answer 1	Answer 1	Answer  Yes  No	Answer  Definition should be handled by elected policymakers, not regulatory bodies. Additionally, sector-specific requirements might be less effective than broader, horizontal legislation that applies across all sectors.
Provide EU guidance on assessing the affordability principle for low income populations	Answer 1	Answer 1	Answer  Yes No	Answer
Others (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

lf y	f you have proposed other potential policy solutions, please specify them below.			

# Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of changing USO scope and features in the Member States and growing e-commerce

Objective 3.1: Ensure that vulnerable users continue to receive services and safeguard territorial cohesion

Sub-objective 3.1.2: Strengthen the rights of all users, incl. vulnerable users	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Strengthen the rights of recipients, e.g. clarify the concept of "recipient", strengthen recipient rights towards the postal operator when the postal company contract is with the sender, e.g. in ecommerce, including information, complaints and compensation.	Answer 2	Answer 1	Answer  Yes  No	Answer  This proposal will only lead to more bureaucratic regulations and more confusion among consumers, sellers and the service providers involved There is no contractual relation between post and the recipient
Improve complaints handling, e.g. extend external complaints procedure to all postal service providers and oblige them to report annually on complaints to the NRA, impose application of the			Answer	Answer  Imposing the CEN standard may be challenging due to certification costs.  Careful consideration

CEN standard, promote/strengthen Alternative Dispute Resolution including by providing EU funding, encourage commercial agreements allowing recipients in e-commerce to complain directly to the delivery company	Answer 2	Answer 2	<ul><li>Yes</li><li>No</li></ul>	is needed to avoid double compensation issues, ensuring a balanced and fair approach to handling complaints and compensations
Make compensation schemes for complaints mandatory for USP	Answer 1	Answer 4	Answer  Yes No	Answer  Ensure level-playing field. Any potential solution needs to apply to all postal operators
Others (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

lf y	If you have proposed other potential policy solutions, please specify them below.				

# Issue 3: Inadequate user rights (including access of vulnerable users to postal services) in the context of changing USO scope and features in the Member States and growing e-commerce

Objective 3.1: Ensure that vulnerable users continue to receive services and safeguard territorial cohesion

Sub-objective 3.1.3: Safeguard territorial cohesion (EU and Member State levels)	Is this policy option likely to be effective in terms of addressing the issue/challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Reduce price differentials between domestic and cross-border parcel deliveries, e.g. giving NRA greater powers to a) monitor wholesale tariffs and terminal dues in intra-Community transactions and b) intervene by means of ex-ante price regulation	Answer 1	Answer 1	Answer	Risk of an administrative financial burden rather than what it is going to improve for the recipients There is no evidence that existing price differentials are not justified, e.g. by higher transportation costs
Co-ordinate delivery frequency in Article 3(3) of the PSD with regulated cross-border transit times in Annex II to ensure that they are so as not to exceed cross-border transit times	Answer 4	Answer 4	Answer	Answer  It is clear that Annex II needs to be revised if art. 3 is revised.  A potential solution might be the revision or deletion of Annex II as domestic delivery

				times have been prolonged
Other (please specify)	Answer  1 2 3 4 5	Answer 1 2 3 4 5	Answer  Yes  No	Answer

If y	f you have proposed other potential policy solutions, please specify them below.			

# Issue 4: Decrease in quality and innovation, as well as increase in prices, for both letters and parcels, as a result of increased market concentration and barriers to entry

Objective 4.1: Make new entry to the market easier and ensure effective market monitoring and enforcement

Sub-objective 4.1.1: Reduce barriers to entry/ encourage new entrants	Is this policy option likely to be effective in terms of addressing the issue /challenge above? Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Make open access to the letter postal network mandatory and give regulators power to set conditions and enforce it.	Answer 1	Answer 1	Answer	Answer  This further weakens the financial position of the USP Additional regulatory powers to set conditions and enforcing access will not be effective in order to create more competition in the physical letter market (which is most of all characterised by falling volumes due to digital competition).
Make existing networks more efficient, e.g. by giving NRAs greater powers to impose conditions on access, clarifying that Article 11a of the PSD applies to parcel lockers, etc.	Answer 1	Answer 1	Answer	Answer  Existing networks, especially for parcels, are already accessible. Granting NRAs greater powers may lead to unnecessary regulatory burdens and stifle innovation.  Additionally, parcel lockers are not a bottleneck, and further regulation is not required.
Improve interoperability between operators, e.g. greater reliance on mandatory standards to ensure that cooperation is	Answer	Answer	Answer	Answer

on equal terms and that new market entrants do not face significant barriers to entry	1	2	Yes	Current level of interoperability is already high. Imposing additional mandatory standards could hinder innovation and flexibility, which are crucial for market development.
Others (please specify)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes  No	Answer

lf y	ou have proposed other potential policy solutions, please specify them below.

### Issue 4: Decrease in quality and innovation, as well as increase in prices, for both letters and parcels, as a result of increased market concentration and barriers to entry

Objective 4.1: Make new entry to the market easier and ensure effective market monitoring and enforcement

Sub-objective 4.1.2: Ensure effective market monitoring and enforcement	Is this policy option likely to be effective in terms of addressing the issue /challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain. Yes/no	Additional explanations/ remarks
Safeguard National Regulatory Authorities' (NRAs') independence, e.g. add to the PSD: conditions for NRA directors, fixed terms, adequate resources and expertise, etc. This could include competences similar to those provided to telecoms regulatory authorities in the European Electronic Communications Code.	Answer 1	Answer 2	Answer	Answer  Not necessary or beneficial, existing structures and resources already ensure sufficient independence and effectiveness.
Promote exchange of experiences, e.g. by establishing ERGP directly in the PSD	Answer 1	Answer 1	Answer	Answer  Current mechanisms for the exchange of experiences among NRAs are adequate and do not require formal incorporation into the PSD.
Ensure sufficient resources and competences for NRAs, e.g. a broader minimum set of core competences defined in the PSD including competences to deal with Significant	Answer	Answer	Answer	Answer  Extending NRA powers to adjacent markets is unnecessary as other regulatory authorities already

Market Power (SMP) situations, giving NRAs the powers to monitor adjacent markets or the ability to directly apply proportionate enforcement mechanisms, etc.	1	2	Yes	oversee these areas. Increasing NRA resources should be addressed by the state, not through expanded PSD mandates.
Mandate specific market monitoring activities to identify significant market power situations, e.g. requiring annual analyses and publishing them, stronger monitoring instruments for NRAs to monitor all postal operators and not just USPs, e.g. regarding consumer protection, transparency of information and quality standards	Answer 1	Answer 1	Answer	Answer  This would lead to an increase in administrative burden without significant benefits
Mandate specific market monitoring activities to identify market failures with regard to consumer protection, transparency of information and quality standards	Answer 1	Answer 1	Answer	Answer  This would lead to an increase in administrative burden without significant benefits
Strengthen the approach to pricing transparency, e.g. oblige operators to provide data on discounted and wholesale tariffs to NRAs and the European Commission	Answer 1	Answer 2	Answer	Answer  Requiring detailed insight into commercial pricing strategies could stifle competition and innovation in the market.
Others (please specify)	Answer  1 2 3 4	Answer  1 2 3 4	Answer  Yes No	Answer

5 5

If yo	f you have proposed other potential policy solutions, please specify them below.					

## Issue 5: Distortion of the level playing field in the wider postal sector that may potentially arise as a result of the expansion of e-commerce platforms into delivery services

Objective 5.1: Ensure a level playing field

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Sub-objective 5.1.1: Definition of a postal operator and scope of the PSD	Is this policy option likely to be effective in terms of addressing the issue/challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Do not change the definition of a postal operator in the PSD but clarify that postal items need to be sorted at least once to qualify as postal service	Answer 2	Answer 2	Answer	Answer  We don't understand the emphasis on sorting as mandatory part of the process
Linked to the above, develop a definition of "sorting"	Answer 1	Answer 1	Answer	Answer  Very difficult to define, does not address the issue
Clarify in the PSD that platform integrated delivery services are included in the postal sector, regardless of whether they deliver their own (self-provision) or third-party goods (but exclude local deliveries of, e.g. food and groceries)	Answer 1	Answer 1	Answer	Answer  Could increase the regulatory burden on NRAs that could leads to higher costs We agree with the need of a level playing field, but this should

				not be regulated in the PSD,
Extend definitions to include delivery which is part of or ancillary to a business service contract (e-retail platforms or food delivery platforms, delivering for other sellers)	Answer 1	Answer 2	Answer	Answer  The postal regulation should focus on the USO, other sectors should be regulated in other legislation
Extend the definition of postal services to include delivery which is part of or ancillary to an end-user service contract (on demand courier services: groceries, flowers, other goods ordered and paid for by the end-user	Answer 1	Answer 2	Answer	Answer
Define postal item weight for non-USP (and potentially also dimensions)	Answer 1	Answer 2	Answer	Answer  Weight is already defined in PSD
Extend powers of NRAs to monitor e-commerce platform integrated delivery services	Answer 2	Answer 2	Answer	Answer  This would lead to an increase in administrative burden without real added value
Extend powers of NRAs to develop approaches to market monitoring of hyper-	Answer	Answer	Answer	Answer  This would lead to an increase in

personalised services	1	1	Yes	administrative burden without real added value
Monitor whether e-commerce platform integrated delivery services with a certain market power (overall or in a certain segment such as B2C) service the whole territory of a Member State at the same recipient price and speed	Answer 2	Answer 2	Answer	Answer  We agree with the need of a level playing field, but this should not be regulated in the PSD
Require integrated delivery services with a certain market power (overall or in a certain segment such as B2C) to provide their tariffs (discounts) to NRA	Answer 1	Answer 1	Answer	Answer  We do not think that the PSD is the right tool to regulate this
Others (please specify)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

lf y	you have proposed other potential policy solutions, please specify them below.					

# Issue 5: Distortion of the level playing field in the wider postal sector that may potentially arise as a result of the expansion of e-commerce platforms into delivery services

Objective 5.1: Ensure a level playing field

Sub-objective 5.1.2: Use horizontal instruments to ensure a level playing field	Is this policy option likely to be effective in terms of addressing the issue/challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts?  If yes, please explain.  Yes/no	Additional explanations/ remarks
Others (please specify)	Answer 5	Answer 4	Answer	Answer

If yo	f you have proposed other potential policy solutions, please specify them below.					

#### Issue 6: Reskilling needs as a result of market developments and the changing role of USPs; deteriorating employment models and conditions

Objective 6.1: Manage employment losses and/or transition to new employment

Sub-objective 6.1.1: Counter increased use of precarious employment models and worsening employment conditions	Is this policy option likely to be effective in terms of addressing the issue/challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Set minimum labour standards for certain types of activities in the postal sector and adjacent sectors in the PSD	Answer 1	Answer 1	Answer	Answer  Minimum labour standards are already well-regulated at national levels and through existing EU legislation. Additional standards is unnecessary and could create regulatory overlaps
Finance reskilling and upskilling e.g. to green economy sectors or future skills in the postal sector	Answer 5	Answer 5	Answer	Answer
Facilitate access to EU funding for reskilling and upskilling workers for new business lines	Answer 4	Answer 4	Answer	Answer
Other (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

f you have proposed other potential policy solutions, please specify them below.					

### Issue 7: Increased net environmental emissions as a result of the growing parcel volumes and reduced capacity to invest

Objective 7.1: Reduce the environmental footprint of the parcel segment

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	Is this policy option likely to be effective in terms of addressing the issue/challenge above?  Scale 1-5 (1: not effective, 5: very effective)	Is the policy solution feasible?  Scale 1-5 (1: not feasible, 5: fully feasible)	Is the solution expected to have any unintended negative impacts? If yes, please explain.  Yes/no	Additional explanations/ remarks
Establish mandatory maximum environmental footprint levels per service	Answer 1	Answer 1	Answer	Answer  This would lead to an increase in administrative burden without real added value
Mandate provision of information on the environmental footprint of each delivery option where several tariff options are offered	Answer 1	Answer 1	Answer	Answer  We agree with the need of a level playing field, but this should not be regulated in the PSD
Require e-retailers to provide at least one "green" delivery option	Answer 1	Answer 1	Answer	Answer  No delivery option is 'green" and no delivery method is in every case more sustainable than another. This very much depends on geography (urban/rural), number of volumes etc
Facilitate access to EU funding for acquisition of green technologies	Answer 4	Answer 4	Answer	Answer
Modify the essential requirements to make the	Answer	Answer	Answer	Answer  This would lead to an increase in administrative burden without real added value. The CSRD and CSDDD already makes us

respect of environmental requirements including emission targets mandatory	3	3	Yes	report on emissions. This information will be widely available in the years to come
Impose reporting obligations on operators on development of environmental footprint	Answer 1	Answer 1	Answer	Answer  This information will be widely available in the years to come. This would lead to an increase in administrative burden without real added value.
Other (please specify below)	Answer  1 2 3 4 5	Answer  1 2 3 4 5	Answer  Yes No	Answer

If you	have proposed other potential policy solutions, please specify them below.

#### Contact

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