



ERGP (12) 30 – report on QoS and end-user satisfaction

ERGP REPORT ON THE QUALITY OF SERVICE AND THE END-USER SATISFACTION



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Content

0.	Executive summary	9
1.	Background	13
2.	Objectives	14
3.	Methodology	15
4.	Current situation regarding quality of service and end-user satisfaction	16
4.1.	Measurement of quality of service concerning transit time and loss	16
4.1.1.	Measurement of domestic transit time of end-to-end services for single piece priority mail and first class mail for the USP - EN 13850	16
4.1.1.1.	Targets for priority single piece mail for 2011 - EN 13850	16
4.1.1.2.	Performance 2011	17
4.1.1.3.	Time assessment since 2006	19
4.1.1.4.	Force majeure	21
4.1.1.5.	Audit	23
4.1.1.6.	Information regarding last collection time	24
4.1.1.7.	Frequency of report to NRA concerning EN 13850	25
4.1.1.8.	Current status of EN13850 by country	25
4.1.1.9.	Implications of the revised EN 13850 standard	26
4.1.1.10.	Measurement of cross-border mail flows	29
4.1.1.11.	Conclusions	30
4.1.2.	Measurement of domestic transit time of end-to-end services for single piece non-priority mail and second class mail - EN 14508	31
4.1.3.	Measurement of domestic transit time for parcels with track and trace system TR 15472	32
4.1.4.	Measurement of loss and substantial delay of priority and first class mail using a survey of test letters - TS 14773	32
4.1.5.	Other relevant indicators related to measurement of transit time	33
4.1.6.	Corrective measures in case of non-compliance with the quality of service target	33



ERGP (12) 30 – report on QoS and end-user satisfaction

4.1.7.	Conclusions	35
4.2.	Collection and delivery	36
4.2.1.	Requirements on the frequency of collection relating to universal service	36
4.2.2	Exceptions to the guaranteed frequency of collection and delivery	38
4.2.3.	Monitoring of compliance with the requirements	40
4.2.4.	Consequences in case of non-compliance with the requirements	40
4.2.5.	Percentage of population affected by the exceptions to the guaranteed frequency of collection and delivery	41
4.2.6.	Differences in collection and/or delivery between geographic areas	41
4.2.7.	USP's obligation to deliver mail within a specified time	42
4.2.8.	Delivery of parcels	42
4.2.9.	Alternative ways of delivery of parcels	42
4.2.10.	Collection of data on the volumes of correspondence/parcels delivered in alternative ways	43
4.3.	Access points	44
4.3.1.	Collection letterboxes	44
4.3.2.	Points of contact	47
4.4.	Measurement of consumer satisfaction	56
4.5.	Surveys regarding customers needs	57
5.	Conclusions on the current practices of NRAs concerning quality of service regulation	59



Tables	Page
1. Results (D+1) in 30 European countries (2006 – 2011)	19
2. Number of force majeure days and reasons in 2011	21
3. Country cases Ireland, Portugal and United Kingdom	21
4. Summarising the current state of EN 13850 by country	25
5. Influence of NRA in old and revised version of standard EN 13850	26
6. Countries case Hungary and Portugal	33
7. Corrective measures in case of non-compliance with QoS target for USP: Letters	33
8. Country case Hungary	34
9. Corrective measures in case of non-compliance with QoS target for USP: Parcels	34
10. Countries case Ireland, Romania and the Netherlands	35
11. Country case – Germany	36
12. Country-specific information regarding the exception for the guaranteed frequency of collection and delivery	38
13. Country cases - Finland and Switzerland	39
14. Consequences in case of non-compliance with the requirements	40
15. Country cases - Hungary and Ireland	40
16. NRAs collect data on the percentage of population affected by the exceptions to the guaranteed frequency of collection and delivery	41
17. Are there any differences in collection and/or delivery between geographic areas	41
18. Country case - Poland	42
19. Country case – Slovakia and Spain	43
20. Requirements/standards to ensure an adequate number of collection letterboxes	44



ERGP (12) 30 – report on QoS and end-user satisfaction

21. Country cases – Austria, Czech Republic, Malta and United Kingdom	45
22. Checking the on-time emptying of collection letterboxes	45
23. Requirements/standards to ensure an adequate number of postal establishments	47
24. Country cases – Austria, France, Germany, Poland and Switzerland	48
25. Requirements/standards concerning the opening hours of the postal establishments	49
26. Country cases – Austria, Hungary and Slovakia	50
27. Entity entitled to check compliance with the requirements concerning number and opening hours of the postal establishments	50
28. Country case – Greece	51
29. Prevention of the closure of postal establishments	51
30. Country case – Denmark	51
31. The percentage distribution of postal establishments in each country	53
32. NRA use/monitor measurement of consumer satisfaction	56
33. Country case Slovakia	56
34. Additional selection of information of different countries	56
35. Surveys regarding customer needs	57
36. Selection of information concerning surveys private consumer	57
37. Selection of information concerning surveys business consumer	57



Figures	Page
1. Targets (D+1) in 29 European countries in 2011	17
2. Results (D+1) in 28 European countries in 2011	18
3. Targets and results (D+1) in 28 European countries in 2011	18
4. Results (D+1) in 30 European countries (2006 – 2011)	20
5. Average results (D+1) in European countries (2006-2011)	20
6. Results (D+3 & D+5) in cross-border measurement in 11 European countries in 2011	29
7. Targets and Results 2011 for EN 14508 (D+3)	31
8. Results 2011 for domestic transit time for parcels (D+1....D+5)	32
9. Number of collections/per week relating to the universal service	37
10. Number of deliveries per week relating to the universal service	37
11. Exceptions to the guaranteed frequency of collection and delivery	38
12. Reasons for exceptions regarding collection and delivery	39
13. Where are the requirements/standards to ensure an adequate number of collection letterboxes defined?	44
14. Evolution in the number of collection letterboxes from 2008 till 2011	46
15. Percentage change in the number of collection letterboxes per countries from 2008 till 2011	46
16. Where are the requirements/standards to ensure an adequate number of postal establishments defined	48
17. Percentage by type of postal establishments	52
18. Change in the number by type of postal establishments from 2008 till 2011	54
19. Location of post agencies managed by third parties	55



ERGP (12) 30 – report on QoS and end-user satisfaction

Terms and abbreviations

CEN – Comité Européen de Normalisation / European Committee for Standardisation

IPC – International Post Corporation

NRA – National regulatory authority

US – Universal service

USP – Universal service provider

USO – Universal service obligation



ERGP (12) 30 – report on QoS and end-user satisfaction

Country codes

AT – Austria	BE – Belgium	BG – Bulgaria	CH – Switzerland
CZ – Czech Republic	CY – Cyprus	DE – Germany	DK – Denmark
EE – Estonia	EL – Greece	ES – Spain	FI – Finland
FR – France	FYROM – Former Yugoslav Republic of Macedonia ¹	HR – Croatia	HU – Hungary
IE – Ireland	IS – Iceland	IT – Italy	LT – Lithuania
LU – Luxembourg	LV – Latvia	MT – Malta	NL – the Netherlands
NO – Norway	PL – Poland	PT – Portugal	RO – Romania
RS - Serbia	SE – Sweden	SI – Slovenia	SK – Slovakia
UK – United Kingdom			

¹ FY is used in tables and figures for the Former Yugoslav Republic of Macedonia



0. Executive summary

- Background

Chapters 6 and 9 of the Postal Directive 97/67/EC, as amended by Directives 2002/39 and 2008/6 shall ensure compliance with the obligations arising from the Directive, in particular through the follow-up of the quality of service.

The Directive emphasises that postal reform has brought significant positive developments in the postal sector, along with increased quality and better customer focus. Increased competition will allow the service provided to ever more demanding users to be improved.

Quality of service standards are set and published in relation to the universal service in order to guarantee a postal service of good quality.

The ERGP will continuously monitor the effects of postal liberalisation through appropriate indicators such as quality benchmarking of postal services and their development over time and the assessment of end-user complaint procedures to ensure that consumers are protected according to the provisions of the Directive.

- Objective

The goal is to collect the necessary data to monitor the quality of service within the context of the regulatory measures taken in that field.

- Current situation regarding the quality of service

The quality of service and end-user satisfaction has been analysed with a view to the following 5 dimensions:

- 1° Measurement of the quality of service concerning transit time and loss
- 2° Collection and delivery
- 3° Access points
- 4° Measurement of consumer satisfaction
- 5° Surveys regarding customers needs

1° Measurement of the quality of service concerning transit time and loss

There are different standards to measure the quality of service concerning the transit time and loss. The application of the standards varies greatly across Europe but the standard most commonly used is EN 13850 (“Measurement of the transit time of end-to-end services for single piece priority mail and first class mail”). Because EN 13850 is mandatory, it is the most important indicator of the postal quality.

Out of the 31 countries who answered to the question concerning the implementation of standard EN 13850 only in Luxembourg and Serbia the standard is not yet implemented while in Finland the standard is not implemented by law but is still complied with by the USP.



ERGP (12) 30 – report on QoS and end-user satisfaction

The results for 2011 were higher than in 2010 for 15 countries. A decrease in results was observed in 10 countries.

There is a high heterogeneity of targets for the measurement of transit time (D+1) among countries participating in research (80% - 97%). Regarding performance 17 countries achieved their targets while 11 countries did not. The average value of results (D+1) in all countries who answered the questionnaire was 86.81%, which is slightly less than the previous year (87.11%).

As regards the implementation and usage of EN 13850 a number of findings were made:

- Force majeure is often not explicitly defined in national laws and just in some countries a general definition is used.
- The audit is a very important part of the standard and the results can only be official if they are audited by an independent body, which is not the case in all countries.
- During the measurement of transit time it is very important to strictly take into account the last collection time². There are three countries where the NRA receives this kind of information.

All NRAs received the results of the measurements and this information is used for publication as well as for corrective measures. In 83% of all countries there are consequences provided for if targets are not achieved.

2° Collection and delivery

The universal service guarantees one clearance and delivery every working day, in urban and rural areas. The frequency of collection and delivery is in almost 70% of the countries 1 collection/delivery per day and 5 collections/deliveries per week for correspondence and for parcels.

Exceptions have been granted in many countries regarding frequency of collection and delivery. The percentage of indicated granted exceptions to the guaranteed frequency of delivery is higher than this of the exceptions to the frequency of collection.

In the majority of the cases – over 80% - the task of monitoring compliance with the requirements is appointed to the NRA.

Furthermore we have collected information about the following elements:

- Percentage of the population affected by the exceptions to the guaranteed frequency of collection and delivery;
- Differences in collection and/or delivery between geographic areas;
- USPs' obligation to deliver mail within a specified time
- Delivery of parcels
- Alternative ways of delivery of parcels

² Last collection time is advertised last time for collection or contracted latest time for collection.



3° Access points

The access point issue is very sensitive and this is shown by the fact that the majority, i.e. almost 80% of the countries, consider it necessary to regulate the number of collection letterboxes and points of contact/postal establishments. Furthermore, in more than half of the countries, the relevant requirements are inserted in the legislation. We have noted that there is a large diversity of the type of points of contact at European level. The most common type is the permanent post office managed by the USP with a full range of services, then the permanent post agencies managed by a 3rd party, followed by permanent post offices with limited range of services, mailman offering basic postal services and mobile post offices.

Furthermore information has been collected on the evolution in the number of points of contact of the Universal Service Provider since 2008 (end of 2008 /end of 2011). Two countries – France and Malta – remain with an unchanged number of points of contact. In Bulgaria, Estonia and Sweden changes are also insignificant. For the rest, in 15 countries there is a reduction in the number of points of contact which vary from 0.7% to 15%, while 6 countries register an increase from 0.3% (Hungary) to 60% (Germany).

4° Measurement of consumer satisfaction

Most of the NRAs have answered that they use or monitor indicators of consumer satisfaction in their country. Customer satisfaction was chosen as a core indicator for monitoring the development of the postal sector last year as more than half of all participating countries used this method. NRAs can use/monitor indicators of consumer satisfaction.

Surveys of consumer satisfaction are collected most often annually or every two years. Mostly there is a legal justification to carry out an annual survey.

Surveys of consumer satisfaction are also often made especially about a part of the universal service: for example concerning residential population, households postal services, large bulk mailers or micro business perception.

5° Surveys regarding customers needs

A small majority of the NRAs have answered that they do conduct market surveys. Market surveys are often carried out annually or in function of needs. The surveys are often conducted by an independent body. Different methods are used as telephone interviews/ computer-assisted telephone interviews (CATIs), standardized questionnaires, face-to-face interviews.



ERGP (12) 30 – report on QoS and end-user satisfaction

- **Final conclusions**

In this report we have collected the core indicators and working tools to monitor the quality of service regarding end-user satisfaction and consumer protection linked back to regulatory measures taken in that field.

We have already collected data regarding these core indicators, especially regarding measurement of domestic transit time of end-to-end services for single piece priority mail, collection & delivery and access points (letter boxes and points of contacts).

Other indicators could also be used to monitor quality of service, namely measurement of consumer satisfaction and surveys regarding customers needs.

Furthermore, we can try to establish a number of cases regarding monitoring of the quality of service.



1. Background

Chapter 6 of the Postal Directive 97/67/EC, as amended by Directives 2002/39 and 2008/6, lays down that the national regulatory authorities (NRAs) shall ensure compliance with the obligations arising from the Directive, in particular through the follow-up of quality of service.

The Directive emphasises that the postal reform brought along significant positive developments in the postal sector, along with increased quality and better user orientation. Increased competition will allow the service provided to ever more demanding users to be improved.

Quality-of-service standards are established and published in relation to the universal service in order to guarantee a postal service of good quality. Quality standards shall focus, in particular, on routing times and on the regularity and reliability of services.

The European Commission established, by the decision of 10 August 2010³, the European Regulators Group for Postal Services (ERGP). The ERGP's tasks shall be:

- a) to advise and assist the Commission in consolidating the internal market for postal services;
- b) to advise and assist the Commission on any matter related to postal services within its competence;
- c) to advise and assist the Commission as to the development of the internal market for postal services and as to the consistent application in all Member States of the regulatory framework for postal services;
- d) to consult, in agreement with the Commission, extensively and at an early stage of its expert work with market participants, consumers and end-users in an open and transparent manner.

The ERGP Plenary approved the ERGP work programme for 2012. This programme includes the elaboration of a report on QoS. The ERGP will continuously monitor the effects of postal liberalisation through appropriate indicators such as quality benchmarking of postal services and their development over time to ensure that consumers are protected according to the provisions of the Directive.

³ OJ C 217, 11.8.2010, p. 7.



2. Objectives

The report examines five key issues in the field of quality of service, namely:

- a) measurement of quality of service concerning transit time
- b) collection and delivery
- c) access points
- d) measurement of consumer satisfaction
- e) surveys regarding customers' needs

The goal is to collect the necessary data to monitor quality of service and end-user satisfaction within the context of the regulatory measures taken in that field.

The document aims at:

- a) identifying the quality of service indicators needed by the NRA to carry out the tasks assigned to them by the Postal Directive and follow up consumer protection measures taken;
- b) reporting on the core quality of service indicators to monitor market development, evaluate the results of regulatory measures and also the consumer protection measures taken especially in the field of complaint handling;
- c) drawing up a consistent and if possible harmonised report regarding core quality of service indicators, allowing as much as possible benchmarks of the market developments at European level

The report looks at the current and past situation (starting point) on data collection and published indicators regarding quality of service. Moreover, the document checks the publication of data for finding data for specific indicators.

Then it analyses this data and identifies trends on the market regarding quality of service, e.g. results of mail transit time, quality of delivery, customer satisfaction and development of the postal network. The objective is to update this report on an annual basis.

This ERGP report describes the current practices of NRAs concerning quality of service regulation, namely measurement indicators, use of European standards, assessment of the conformity of the measurements performed.



3. Methodology

To obtain information, a questionnaire has been issued to collect information on the current situation regarding the quality of service and end-user satisfaction in the broad sense of the term. This group had also issued a questionnaire to obtain information on the practice of NRAs and views on core indicators for market monitoring. To draft this report we used the data from both questionnaires.

Of the 33 ERGP members 32 NRAs provided feedback: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Former Yugoslav Republic of Macedonia, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland and United Kingdom.

Furthermore, we would like to point out that the objective of the study is to form a picture of the current practices of NRAs regarding the quality of service and is not to determine at this stage of our work the most adequate instruments. **The country cases mentioned in the report are only examples of practices and cannot be interpreted as best practices.**

The analysis thereof is primarily based on the answers provided to the questionnaires (June 2012), which in general, reflects the legislation and practice in place at the time of response.



4. Current situation regarding the quality of service and end-user satisfaction

The quality of service and end-user satisfaction has been analysed with a view to the following 5 dimensions:

- 1° Measurement of the quality of service concerning transit time and loss
- 2° Collection and delivery
- 3° Access points
- 4° Measurement of consumer satisfaction
- 5° Surveys regarding customers needs

Of course other elements could also be used to monitor quality of service, end-user satisfaction and consumer protection but in this report the scope has been limited to the dimensions above.

We have also referred to the technical standards developed in the field of quality of service by CEN (European Committee for Standardisation) as foreseen in article 20 of the Directive.

4.1. Measurement of quality of service concerning transit time and loss

4.1.1. Measurement of domestic transit time of end-to-end services for single piece priority mail and first class mail for the USP - EN 13850

This standard is the only mandatory one in all EU Member States. The legal ground was laid down in Directive 97/67/EC (Chapters 6 & 7 and Annex 2). The Directive also designated CEN (European Committee for Standardisation) as an organisation responsible for drawing up technical standards applicable in the postal sector. The European Commission published standard EN 13850 in the Official Journal of the European Union C30/3 on February 5th 2005 and on March 21st 2005 the Head of the Postal Unit (DG Internal Market) sent a letter to all members of the PDC (Postal Directive Committee) informing them about the mandatory status of standard EN 13850.

Out of the 32 countries who answered to the question concerning the implementation of standard EN 13850 only in Luxembourg and Serbia the standard is not yet implemented while in Finland the standard is not implemented by law but is still complied with by the USP.

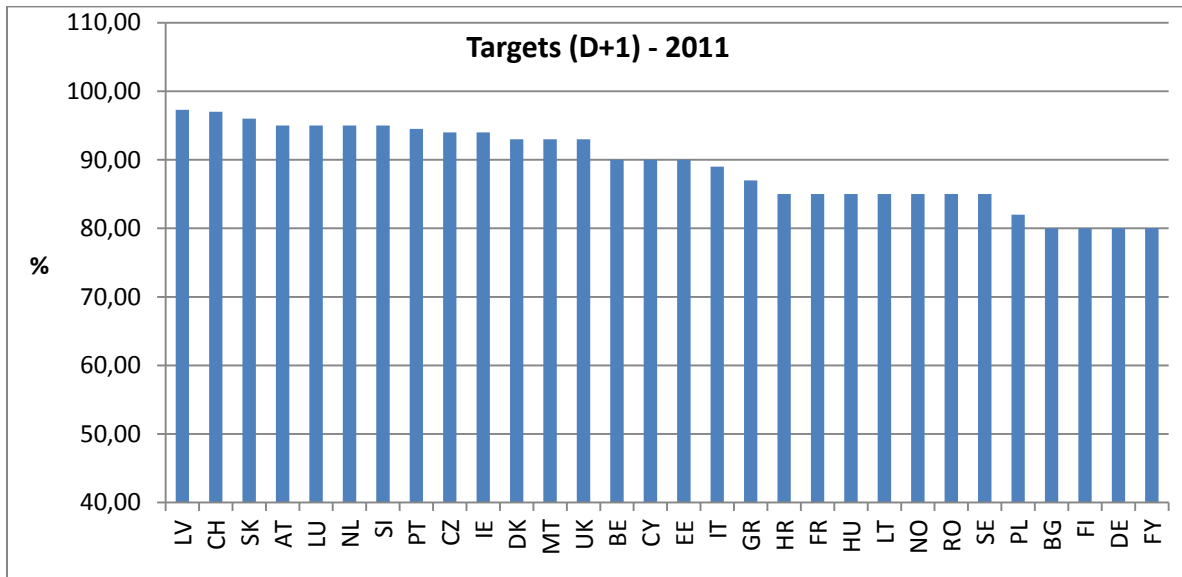
4.1.1.1. Targets for priority single piece mail for 2011 - EN 13850

In 2011 targets for measuring the transit time of end-to-end priority mail in the domestic postal market were established in 30 countries. However, there is a high heterogeneity of targets. The table shows the relatively low targets in Bulgaria, Germany, Finland and Former Yugoslav Republic of Macedonia (80%) compared to the high targets in Latvia and Switzerland (97%).



The average value of targets (D+1) in all countries who answered the questionnaire was 89.16%.

Figure 1 - Targets (D+1) in 30 European countries in 2011



In Spain there is no D+1 target as target is established at D+3 as there is no priority class.

4.1.1.2. Performance 2011

The results for 2011 were higher than in 2010 for 15 countries. 13 countries exceeded the average results in 2011. The highest improvement by far was measured in Lithuania (from 64.95% in 2010 to 81.26% in 2011). A decrease in results was observed in 10 countries, the most extreme decrease was in Estonia (from 92.70% in 2010 to 87.20% in 2011), Latvia (from 90.00% in 2010 to 86.90% in 2011) and Romania (from 56.20% in 2010 to 40.60% in 2011). Romania is the country with lowest result (40.60%) among all countries participating in this research. Also a decrease of quality of transit time was noticed in Former Yugoslav Republic of Macedonia (57.20%). The result of Poland (63.40%) is still one of the lowest results compared to the other ERGP members.

Regarding performance 18 countries achieved their targets while 11 countries did not. Austria marks its results as confidential. The average value of results (D+1) in all countries who answered the questionnaire was 87.06%, which is slightly less than previous year (87.11%).



Figure 2 - Results (D+1) in 29 European countries in 2011

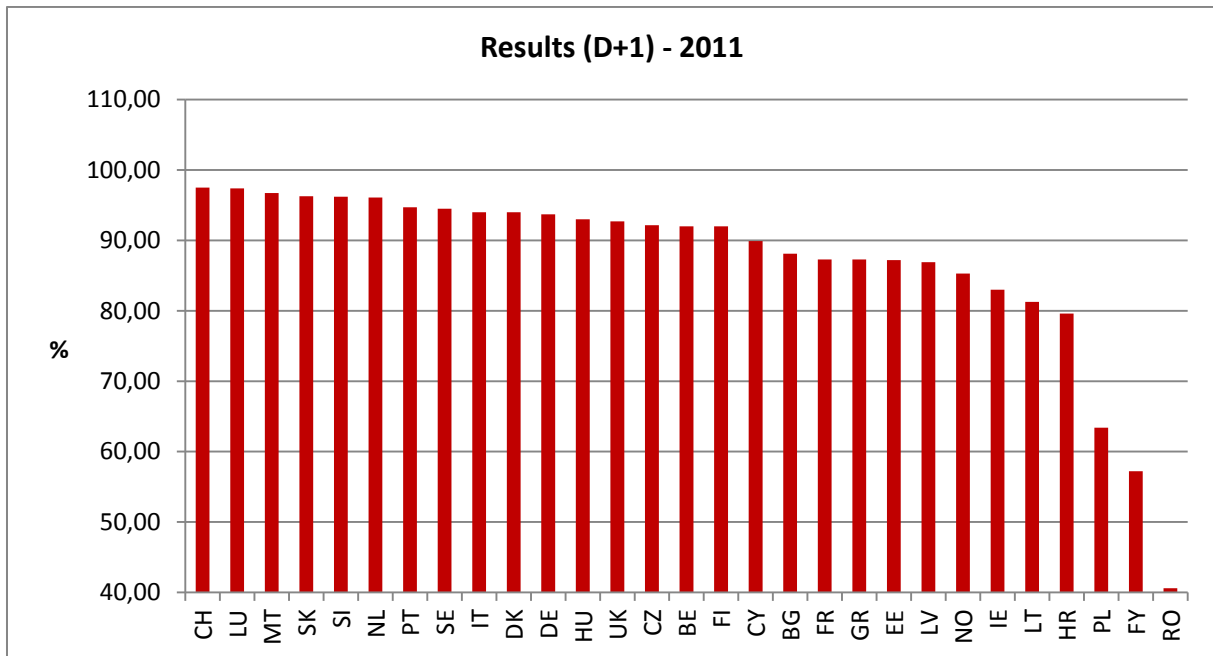
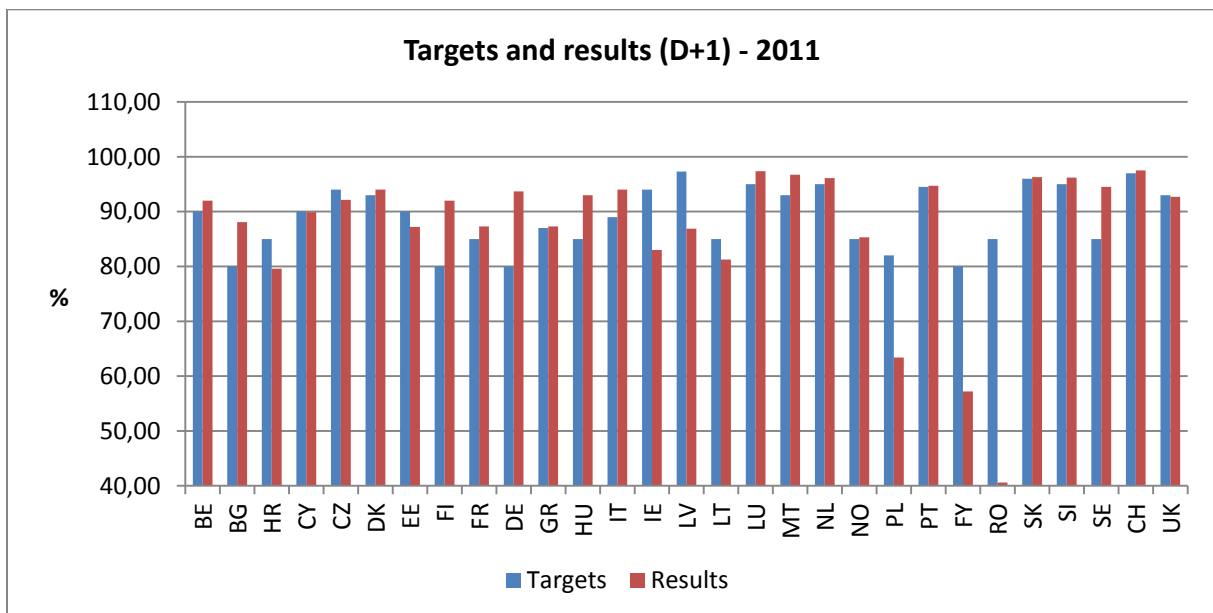


Figure 3 - Targets and results (D+1) in 29 European countries in 2011



It is also important to mention the efforts of non EU Member States (Croatia, Norway, Former Yugoslav Republic of Macedonia and Switzerland) where the measurement of the quality of transit time is in place because they are CEN-Members.



4.1.1.3. Time assessment since 2006

Results in the period from 2006 until 2011 are taken from CERP⁴ and ERGP⁵ reports.

Table 1 - Results (D+1) in 30 European countries (2006 – 2011)

	2006	2007	2008	2009	2010	2011
AT	n.a.	n.a.	n.a.	96.96%	confidential	confidential
BE	92.00%	92.60%	93.80%	93.20%	93.30%	92%
BG	75.50%	80.50%	68.80%	84.20%	83.60%	88.10%
HR	n.a.	71.80%	72.10%	62.82%	78%	79.60%
CY	n.a.	n.a.	n.a.	86.40%	89.40%	89.90%
CZ	94.06%	89.15%	90.64%	92.09%	93.19%	92.15%
DK	94.10%	93.20%	93.70%	95.70%	93.70%	94%
EE	90.50%	90.60%	91.50%	93.80%	92.70%	87.20%
FR	81.20%	82.50%	83.90%	84.70%	83.40%	87.30%
DE	95.90%	95.80%	>95%	94%	92.80%	93.70%
EL	77.70%	78.80%	79.90%	81.50%	87.70%	87.30%
HU	91.78%	92.34%	92.69%	93.05%	93.68%	93%
IE	72.00%	77.00%	79.00%	84%	85%	83%
IT	n.a.	n.a.	n.a.	n.a.	n.a.	94%
LV	92.50%	95.60%	96.10%	n.a.	90%	86.90%
LT	68.00%	58.00%	76.00%	77%	64.95%	81.26%
LU	97.25%	97.40%	98.10%	97.93%	97.99%	97.38%
MT	92.14%	94.86%	93.29%	95.13%	95.09%	96.73%
NL	n.a.	n.a.	n.a.	95.20%	92.90%	96.10%
NO	82.40%	85.10%	87.10%	88.30%	83.50%	85.30%
PL	68.22%	77.21%	76.49%	52.70%	53.40%	63.40%
PT	92.60%	94.70%	95.00%	95.20%	94.70%	94.70%
FYROM	n.a.	n.a.	n.a.	n.a.	n.a.	57.20%
RO	n.a.	n.a.	19.50%	46.20%	56.20%	40.60%
RS	30.96%	35.13%	44.14%	70.11%	70.49%	78.16%
SK	96.53%	96.15%	96.08%	96.10%	96.82%	96.28%
SI	88.00%	88.40%	92.00%	93.90%	95.50%	96.20%
SE	94.20%	94.50%	94.90%	95.70%	93,70%	94,50%
CH	98.00%	97.10%	95.90%	97.70%	97.20%	97.50%
UK	94.10%	94.00%	85.20%	87.90%	91.40%	92.70%

⁴ CERP documents published on CERP web site:

<http://www.cept.org/cepr/deliverables/list-of-documents-%28history%29>:

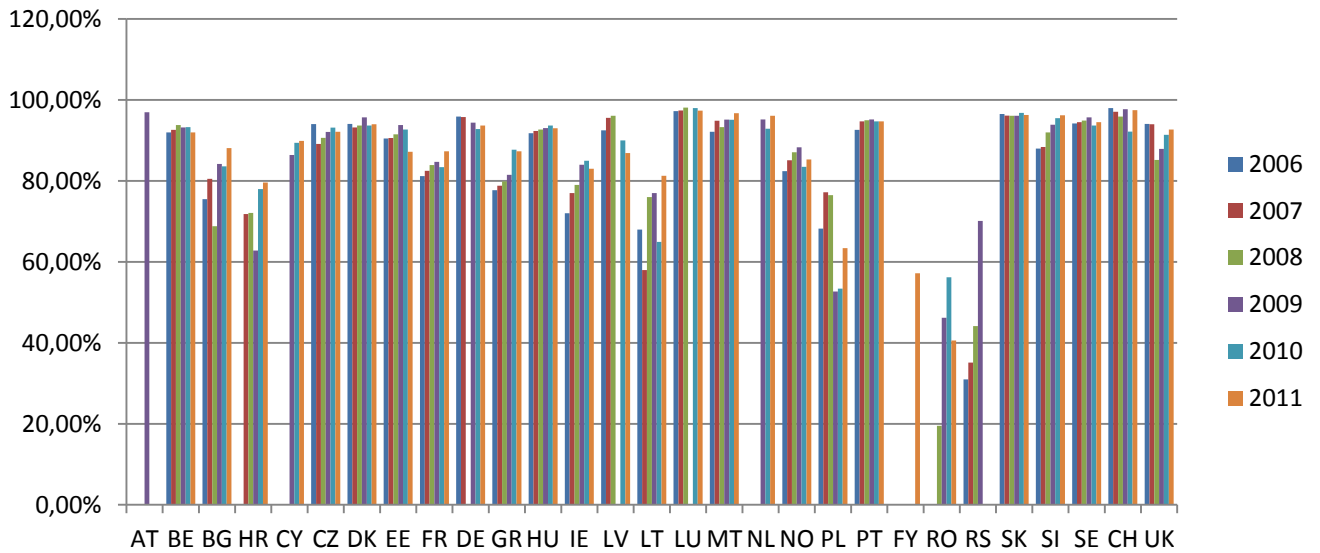
- CERP Quality of Service Report 2008
- Report Application of EN 13850
- Report Implementation of CEN Standards
- Report Implementation of CEN Standards I

⁵ « Report on the quality of service and the end-user satisfaction » published on ERGP web site:

http://ec.europa.eu/internal_market/ergp/documentation/documents_en.htm

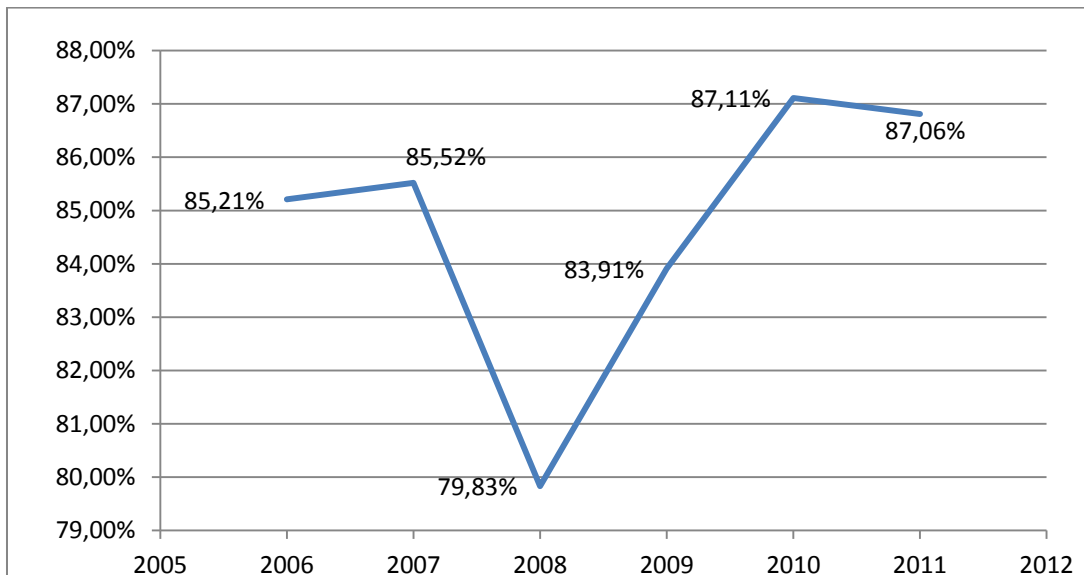


Figure 4 - Results (D+1) in 30 European countries (2006 – 2011)



In the period from 2006 until 2011 results (D+1) show constant improvement in most cases. In some countries one can notice an oscillation in results, while in just few of them also a slight decline in quality of transit time can be observed. Average results (D+1) in the period from 2006 until 2011 are shown in the figure below, which shows a gradually improvement since 2008.

Figure 5 - Average results (D+1) in European countries (2006-2011)





4.1.1.4. Force majeure

In the ERGP questionnaire we assessed how «force majeure» events that affected quality of service performance were dealt with by the NRAs and what, if any, difficulties arose when considering the impact of force majeure events on QoS measurement. To sum up, force majeure is often not explicitly defined in national laws. No specific rules exist and only a general definition is used in 9 countries. An agreement between NRA and USP is valid in 17 countries. In 2011, the range of force majeure days was from 0 to 25 days. The following reasons were principally mentioned: extreme weather conditions (12 countries)⁶, natural disasters (6 countries) and national strikes (4 countries).

In the table below 8 countries stated the number of force majeure days and reasons for those events.

Table 2 – Number of force majeure days and reasons in 2011

Country	Number of days	Reasons
BE	4	Extreme weather conditions and national strike.
FI	25	Extreme weather conditions and national strike.
EL	10	Extreme weather conditions and national strike.
PT	3	National strike.
RS	4-5	National strikes.
SI	20	Natural disasters; Extreme weather conditions.
UK	4	Natural disasters; Extreme weather conditions.

As examples for force majeure we would like to mention the handling in Ireland, Portugal and the United Kingdom, indicated in the table below.

Table 3 - Country cases Ireland, Portugal and the United Kingdom

Ireland: Force majeure is not defined in the Irish postal legislation. For this purpose the NRA should rely on EN/TR14709 Guide for the implementation of EN 13850 which confirms a force majeure event as “(...) events such as natural disasters or terrorist attacks (...)” and the case law of the European Court of Justice (See EFMLG (European Financial Market Lawyers Group) report)) and com(2003) 830/final. As per EN13850, “deduction of “force majeure” events, may be considered in agreement with the NRA. The USP would submit a request and the NRA would assess whether it considers it to be a force majeure event based on the information provided by the USP and the CEN definition, etc.

⁶ Extreme weather conditions, see country cases and the definition in the revised version of the standard EN 13850



Portugal: Should any “force majeure” events or other phenomena occur, the burst and evolution of which are clearly outside the control of the USP, and have an impact on the quality of service provided by the USP, the USP may request to deduct the periods of time and geographic flows in question. “Force majeure” events or phenomena mentioned in the preceding paragraph shall be deemed to mean unpredictable or insurmountable natural events and/or facts attributable to third parties, that are triggered, evolve, or the effects of which occur regardless of USP’s will and ability to control, such as war, subversion, epidemics, cyclones, earthquakes, fire, lightning, floods, general strikes and any other similar events that may impair normal conditions of clearance, sorting, transport and distribution of postal items. The NRA issues a decision (after a “minded to decision”) accepting, refusing or accepting with changes the request made by the USP. (Source: Universal Postal Service Quality Convention, 10 July 2008.)

United Kingdom: There is no single definition of what constitutes force majeure.

2. The regulator agrees on force majeure issues.

3. USP’s applications for adjustments to end-to-end quality of service results due to force majeure are made when a single event or a very small number of events impact the full year performance. USO force majeure applications are different in that USP reports all collection and delivery failures in the UK on a quarterly basis. The cumulative effect of these failures in a year could result in it missing its 99.9% targets for deliveries and collections.

4. Former regulator Postcomm previously applied three tests to USP’s claims for force majeure, these tests continue to be applied in the new regulatory regime at Ofcom:

- does the event by its unpredictable nature and severity qualify as force majeure? In assessing this point, detailed information on the nature, cause and extent of the disruption and, in particular, whether the event was beyond USP’s control was considered;
- were adequate contingency plans in place and were they deployed? In assessing this point there was consideration of whether USP took all reasonable steps to avoid the event or mitigate its impact upon quality of service. It shall supply evidence of the reasons why the plans failed or were not adequate or were not able to be deployed; and
- how extensive was the impact and what, if any, adjustments have to be made to a full year of quality of service results? (Implicit in this test is that the allegedly force majeure events (and not some other reason) led to a reduction in quality of service performance.)

Revised version⁷ of Standard EN 13850 also deals with “force majeure” saying that force majeure is a common principle with different approaches depending on history, knowledge e.g. The force majeure definition is standard is derived from the Unidroit Principles of International Commercial Contracts (2004):

- Non-performance by a party is excused if that party proves that the non-performance was due to an impediment beyond its control and that it could not reasonably be expected to have taken the impediment into account at the time of the conclusion of the contract or to have avoided or overcome it or its consequences.
- When the impediment is only temporary, the excuse shall have effect for such period as is reasonable having regard to the effect of the impediment on the performance of the contract.

⁷ Finalization in progress with prospect of publication at the end of 2012.



ERGP (12) 30 – report on QoS and end-user satisfaction

- The party who fails to perform must give notice to the other party of the impediment and its effect on its ability to perform.

The impediment mentioned above may affect the ability of the operator to perform as well as the ability of the independent performance monitoring organization to measure.

It is advisable to keep a dialogue on force majeure events with the USP. All cases should be resolved immediately after the event in order not to delay the report at the end of the measurement period. This is especially advisable when internal preliminary reports are calculated for example monthly or quarterly.

As regards to the question concerning the suspension of some periods during the year of measurement only 3 countries (Slovakia, Serbia, United Kingdom) deduct particular periods (Christmas, Easter, etc.) from the actual measurement.

4.1.1.5. Audit

An audit is a systematic and independent examination to determine whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives..

The revised version of EN 13850⁸ stated that the measurement system shall be audited every three years.

Exceptions from this rule are years during which:

- the supplier changes,
- changes to the methodology of the measurement occur.

In these cases, the audit has to be done in the year following the year in which the changes took place. It may also be that the NRA requires additional audits for domestic measurement systems.

The audit shall be implemented by an independent body approved by the regulator(s) in order to check the design, set-up and maintenance of the QoS measurement system, including an evaluation if:

- the requirements of this European standard are fulfilled;
- changes in the sample design (e.g.: design basis, geographical stratification, discriminatory mail characteristics) that prove to be more efficient for a given operator, remain coherent with the requirements in this European standard.

In common agreement between the operator and the NRA, the audit or parts of the audit can be done by or assisted by the NRA. If this is the case, those parts of the study where the NRA itself has made a choice between options should be subject to audit by an additional external auditor independent of the NRA.

The audit shall verify that the body in charge of the measurement system is independent from the postal operators.

⁸ See footnote 7



ERGP (12) 30 – report on QoS and end-user satisfaction

In the questionnaire the WG asked NRAs about the responsibility for auditing. Responsibility for auditing is in 15 cases in hands of NRAs, in 5 cases USPs, in 2 cases USP and NRA together and in 6 cases done by other means (independent organizations). There is no audit system in place in Bulgaria and Serbia but these considered the results of the measurement as official. The same thing can also be noticed in 8 other countries (Croatia, Denmark, France, Former Yugoslav Republic of Macedonia, Finland, Hungary, Lithuania, Luxembourg).

4.1.1.6. Information regarding the last collection time

The average level of density of mail boxes per 10.000 inhabitants in the 24 European countries is 16.5 boxes. Norway stands out with 50 mail boxes per 10.000 inhabitants; the reason is sparsely populated areas and areas that are not easy to access. In most countries the density of mail boxes is much closer to the average, ranging from 7 to 26 mail boxes per 10.000 inhabitants⁹.

The advertised last time for collection or the contractual last time for collection is often not the same as the actual collection time, because from the postal work organization point of view, the collection usually happens some time later than the advertised last collection time (e.g. the collection routing timetable can only be defined with some tolerance).

During the measurement of transit time it is very important to strictly take into account the last collection time. The calculation of the transit time takes into account test items posted before the last collection time of the day for the type of mail in the field of study. The last collection time is taken as stated on the postal letterbox, published at the post office or otherwise announced by the postal operator.

Test items posted after that time shall be considered as posted on the next collection day. If a test item is posted after the last collection time, then the day of induction J should be adjusted to the next working day for this type of mail.

Definition of last collection time is also part of Standard EN 13850 where it is stated: *“ Last collection time is advertised last time for collection or contracted latest time for collection. This is often not equal to the actual collection time, because from the postal work-organization point of view, the collection usually happens some time later than the advertised last collection time (e.g. the collection routing timetable can only be defined with some tolerance). Also one must be aware that time of posting is time when a postal item is posted at its induction point and it may be before or after the actual last time of collection.”*

The average collection time was calculated in 3 countries (Former Yugoslav Republic of Macedonia, Poland, Slovakia,) while in the United Kingdom 99.8% of the mail is collected by the final advertised time of collection. Three countries (Former Yugoslav Republic of Macedonia, Poland, Slovakia) have set a time for the last collection in urban areas. This time varies from 15.00 until 20.05.

⁹ EC Study « Main developments in the postal sector (2008-2010)»



4.1.1.7. Frequency of report to NRA concerning EN 13850

Furthermore we inquired about the reporting frequency to NRAs concerning EN 13850. All NRAs received results annually or more often. 11 NRAs also received results half-yearly or quarterly, 3 NRAs also received reports monthly.

The information contained in the results was mostly used for publication, for the quality check-up and where applicable for imposing fines or other corrective measures. According to the information reported by NRAs, there was actually no other competitor in any country apart from the USP that was willing to adapt the EN 13850 measurement.

4.1.1.8. Current status of EN 13850 by country

When asked whether the EN 13850 standard is implemented in their countries all NRAs except 1 answered positive, only in Serbia the standard is not yet implemented while in Finland the standard is not implemented by law but is still complied with by the USP.

In the table below you will find the current status of EN 13850 in each country regarding:

- implementation;
- targets;
- sanctions;
- national peculiarities.

Table 4 - Summarising the current state of EN 13850 by country

Question	Answer	Count	Country	%
EN13850 implemented?	Yes	31	AT, BE, BG, HR, CY, CZ, DK, EE, FI, FYROM, FR, DE, EL, HU, IE, IT, LV, LT, LU, MT, NL, NO, PL, PT, RO, SK, SI, ES, SE, CH	97
	No	1	RS	3
Targets achieved in 2011?	Yes	18	BE, BG, DK, FI, FR, DE, EL, HU, IT, LU, MT, NL, NO, PT, SK, SI, SE, CH	62
	No	11	HR, CY, CZ, FYROM, EE, IE, LV, LT, PL, RO, UK	38
Any consequences provided for in the legislation if target is not achieved?	Yes	26	AT, BE, BG, HR, CY, CZ, EE, FI, FR, DE, EL, HU, IE, IT, LT, LU, MT, NL, NO, PT, RO, RS, SK, SI, ES, UK	84
	No	5	FYROM, LV, PL, SE, CH	16



National peculiarities ¹⁰	Yes	19	BG, HR, CY, FI, FYROM, EE, FR, DE, EL, IE, IT, LU, MT, PT, RS, SK, SI, CH, UK	61
	No	12	AT, BE, CZ, DK, HU, LV, LT, NL, NO, PL, ES, SE	39

4.1.1.9. Implications of the revised EN 13850 standard

After several years of adjustments to take into account new developments in the postal sector, e.g. cross-border flows between new countries, multiple operators, domestic small volumes... a revised version of the EN 13850 standard completed by CEN/TC 331 WG1 is expected at the end of 2012. This version brings about many changes of which the following ones are very important for future measurements according to this standard:

- Methodology: instead of calculation, table values are introduced; changes in the part dealing with maximum sample size (MSS) for flows with small real mail volumes (domestic and cross-border).
- The transit time calculation rule was amended for special cases in cross-border (national or regional holidays included).
- Unclear definitions were clarified (for example: definition of single piece mail).
- Accuracy calculation method was supplemented to improve applicability.
- Detailed initial audit after first measurement period and re-audits at least every 3 years are required. Upon request of the NRA audits can be performed more frequently.
- Merge of different documents into standard – 10 Annexes of which 6 informative (for example: Implementation Guide).

Significant changes are also noticed as regards the influence of NRAs which was slightly diminished (NRA mentioned 10 times in the « old » version and just 7 times in the revised version).

Table 5 - Influence of NRA in the old and revised version of standard EN 13850

Old version of EN 13850	Revised version of EN 13850 ¹¹
<p><u>Article 4.2.2 (Continuity of measurement), 2nd paragraph</u></p> <p>However in case of “force majeure” events, deduction of the corresponding period may be considered in agreement with the NRA, and shall be indicated in the reporting.</p>	<p><u>Article 5.2.2 Continuity of measurement, 3rd paragraph</u></p> <p>For domestic mail any intended deduction shall be reported to the NRA without delay. Agreement with the NRA on all planned domestic deductions due to force majeure is required prior to the calculation of the annual report.</p>

¹⁰ Geographical circumstances (e.g. islands, mountains, etc.).

¹¹ See footnote 7



ERGP (12) 30 – report on QoS and end-user satisfaction

<p><u>Article 4.2.3 (Calculation of the transit time), 2nd paragraph</u></p> <p>For domestic mail, the transit times may, in addition, be calculated according to the weekend collection and delivery pattern provided, in accordance with one of the calculation rules of B.2, if required by the NRA.</p>	<p><u>Annex B (normative -Transit Time Calculation Rule), B.1, 4th paragraph</u></p> <p>Any additional calculation rule to those six rules presented in Annex B shall be defined before applying the standard. For domestic measurements this definition shall be done in accordance with the NRA. For cross-border mail the regulator can apply an adequate calculation rule.</p>
<p><u>Article 4.2.3 (Calculation of the transit time), 4th paragraph</u></p> <p>Published regional holidays may be subtracted in the calculation of transit time, in agreement with the NRA.</p>	<p>This is removed</p>
<p><u>Article 5.3 (Real mail studies), 6th paragraph</u></p> <p>The frequency of the real mail studies shall be determined in accordance with the NRA and shall be performed at least once every three years.</p>	<p>This is removed</p>
<p><u>Article 5.4.1 (General), 1st paragraph</u></p> <p>Geographical stratification shall be the basis of the sample design. The following stratification is a minimum requirement that may be improved for each field of study by including additional strata, and shall only be replaced by other geographical parameters if it is demonstrated by auditable proof, that these are more discriminatory, and in agreement with the NRA.</p>	<p><u>Article 6.3 (Determination of the design basis), 2nd paragraph</u></p> <p>Before and during the first measurement period in a one-operator test mail system or at all times in a multi-operator test mail system the use of an alternative design basis may be necessary. In agreement with the regulator(s) and reported operator(s) in the field of study, at least one of the structures in 5.3.1 – (5.3.1.1 – 5.3.1.4) – 5.3.2 presented as a cascade in descending order of reliability shall be used as the design for each discriminatory mail characteristic.</p>
<p><u>Article 5.5 (Geographical distribution of the panel), 1st paragraph</u></p> <p>The distribution of the panel shall be done according to random sampling. The whole of the area defined in the field of study shall be eligible. There shall be at least 30 postal areas evenly spread over the whole field of study and the postal areas shall be defined in agreement with the NRA.</p>	<p><u>Article 6.4.3 (Geographical stratification), 5th paragraph</u></p> <p>For domestic systems, the choice and number of postal areas shall be laid down in agreement with the NRA.</p>



<p><u>Article 6.1 (General), 3rd paragraph</u></p> <p>For the domestic measurement systems, in agreement with the NRA, the list of all discriminatory mail characteristics from one operator may be revised based on the results of empirical studies on the subject.</p>	<p>This is removed</p>
<p><u>Article 6.2 (Highly discriminatory mail characteristics), 2nd paragraph</u></p> <p>PO boxes may be excluded from the measurement system in agreement with the NRA.</p>	<p>This is removed</p>
<p><u>Article B.2 (Additional calculation rules / domestic mail), 1st sentence</u></p> <p>For domestic mail, the transit times may, in addition, be calculated according to the weekend collection and delivery pattern provided as shown in B.2.1 to B.2.4, if required by the NRA.</p>	<p><u>Annex B (normative - Transit Time Calculation Rule), B.1, 4th paragraph</u></p> <p>Any additional calculation rule to those six rules presented in Annex B shall be defined before applying the standard. For domestic measurements this definition shall be done in accordance with the NRA. For cross-border mail the regulator can apply an adequate calculation rule.</p>
<p><u>Article C.10 (Auditing), 1st sentence</u></p> <p>The audit shall be implemented by an independent body approved by the NRA for the real mail studies and for the quality of service measurement system, ...</p>	<p><u>Article C.2 (Auditing – general remarks), 4th paragraph</u></p> <p>The audit shall be implemented by an independent body approved by the regulator(s) in order to check the design, introduce maintenance of the QoS measurement system, ...</p> <p><u>Article 7 (Quality control and auditing), 4th paragraph</u></p> <p>For domestic systems, the audit cycle shall be agreed with the NRA.</p> <p><u>Article C.2 (Auditing – general remarks), 3rd paragraph</u></p> <p>It may also be that the NRA requires additional audits for domestic measurement systems.</p>

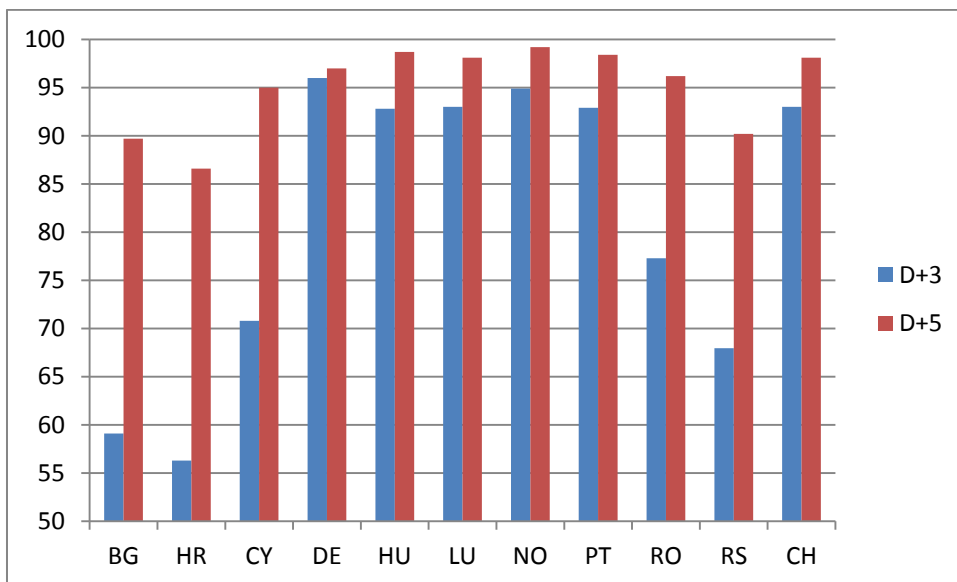


4.1.1.10. Measurement of cross-border mail flows

In Europe the UNEX design complies with the CEN standard EN 13850 that specifies the methodology for monitoring of quality of service in the European Union. Compliance with this standard is mandatory for all Member States.

Only a few countries have provided data on the results of the cross-border measurement, most of them with the targets for transit time D+3 and D+5. Results shows that just 2 countries did not achieve the prescribed targets, in this case D+3 = 85% and D+5 = 97% targets established in 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 improvement of quality of service.

Figure 6 - Results (D+3 & D+5) in cross-border measurement in 11 European countries in 2011¹²



Measurement of cross-border mail is conducted by IPC¹³ in the frame of the system UNEX¹⁴ which is used to measure international letter service performance. The UNEX system was introduced in 1994 with just 18 postal operators in 18 countries. Since 2008 UNEX covered all 27 EU Member States together with Iceland, Norway and Switzerland as well as Bosnia & Herzegovina, Croatia, the Former Yugoslav Republic of Macedonia and Turkey. Lastly, Serbia was included as of April 2011.

¹² France has the following results for incoming cross-border mail, namely D+3 = 96% and D+5 = 99,3% and for outgoing cross-border mail, namely D+3 = 93,6% and D + 5 = 98,4%

¹³ International Post Corporation

¹⁴ UNEX system is used to measure international letter service performance between more than 40 postal operators worldwide.



ERGP (12) 30 – report on QoS and end-user satisfaction

Since 1994, the first year the UNEX system was implemented, participating European postal operators have dramatically improved the speed and efficiency of international letter service. On average, results show that in 2008, nearly twice as much mail was delivered in two days (81.8% of test mail delivered in J+2) as in 1994 (43.5% in J+2).

In 2011 European priority letter mail service performance exceeded the European Union (EU) objectives for the 14th successive year¹⁵. The IPC UNEX measurement system showed that 93.0% of letters were delivered within three days of posting and 98.1% within five days. This exceeds the objectives set in the EU Postal Directives of 85% in three days (J+3), and 97% in five days (J+5).

Detailed results and historic data can be found on IPC's web site <http://www.ipc.be/>

4.1.1.11. Conclusions

Based on the ERGP research, ERGP can make the following conclusions:

1. EN 13850 is the only mandatory standard and countries are aware of that fact as well as the fact that the revised standard will replace the “old” version.
2. There is a high heterogeneity of targets for the measurement of transit time (D+1) among countries participating in research (80% - 97%).
3. The results of the measurement of transit time (D+1) in 2011 are better than in 2010 and more than 60% of countries achieved prescribed targets.
4. In the period from 2006 until 2011 results of the measurement of transit time (D+1) were constantly improving.
5. As regards the implementation and usage of EN 13850 a number of findings were made:
 - a. Force majeure is often not explicitly defined in national laws and just in several countries a general definition is used.
 - b. The audit is a very important part of the standard and the results can only be official if they are audited by an independent body, which is not the case in all countries.
 - c. During the measurement of transit time it is very important to strictly take into account the last collection time¹⁶.
 - d. All NRAs received the results of the measurements and this information is used for publication as well as for corrective measures. In 83% of all countries there are consequences provided for if targets are not achieved.

¹⁵ <http://www.ipc.be/en>

¹⁶ Last collection time is advertised last time for collection or contracted latest time for collection.

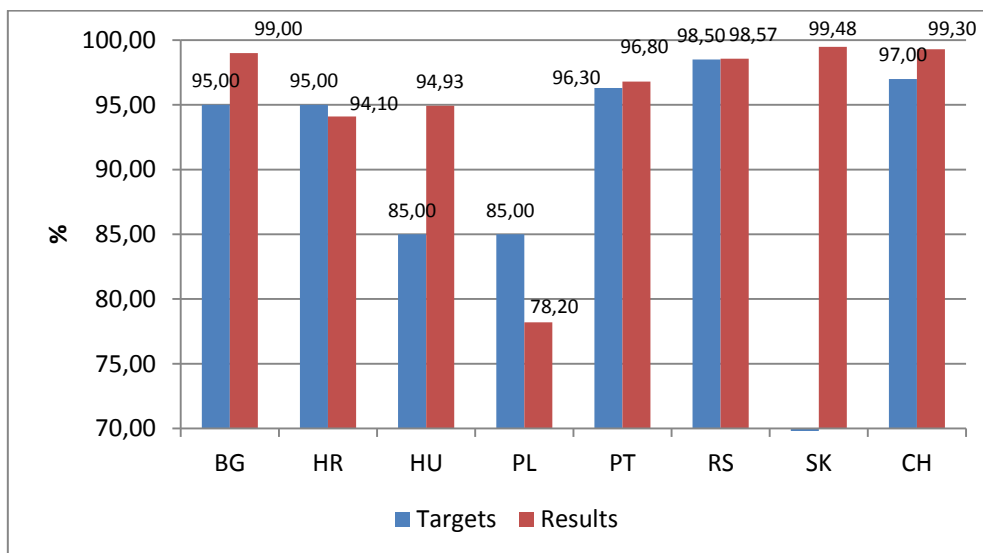


4.1.2. Measurement of domestic transit time of end-to-end services for single piece non-priority mail and second class mail - EN 14508

Standard EN 14508 (measurement of domestic transit time of end-to-end services for single piece non-priority mail and second class mail) is implemented only in 10 countries, partly also because this service does not exist in all countries.

There is a range of targets from D+1 until D+5, most common targets are set for D+3. In 2011 these targets varied between 85% and 98.5% (average 93.10%). 8 NRAs gave data for D+3. In general, the results for D+3 were good in 2011, with an average of 95.05%.

Figure 7 - Targets and Results 2011 for EN 14508 (D+3)



Introducing 2 categories of services (priority and non-priority) is very common by European USPs in recent years. In most of the cases priority mail was introduced as a new category and the existent service changed name and became the non-priority service. Typical for this process was the preservation of the tariffs for non-priority mail and a price increase for priority mail. On the one hand it is a benefit for the consumers to have a choice between different categories of services but on the other hand it appears that consumers may have to pay a higher price if they want to obtain a priority service.

As a result of introducing a non-priority service we saw a decrease in priority mail volumes. Available data shows that the share of priority mail as regards the total volume of mail is very small, in Hungary, Slovakia, and Poland even less than 30%.

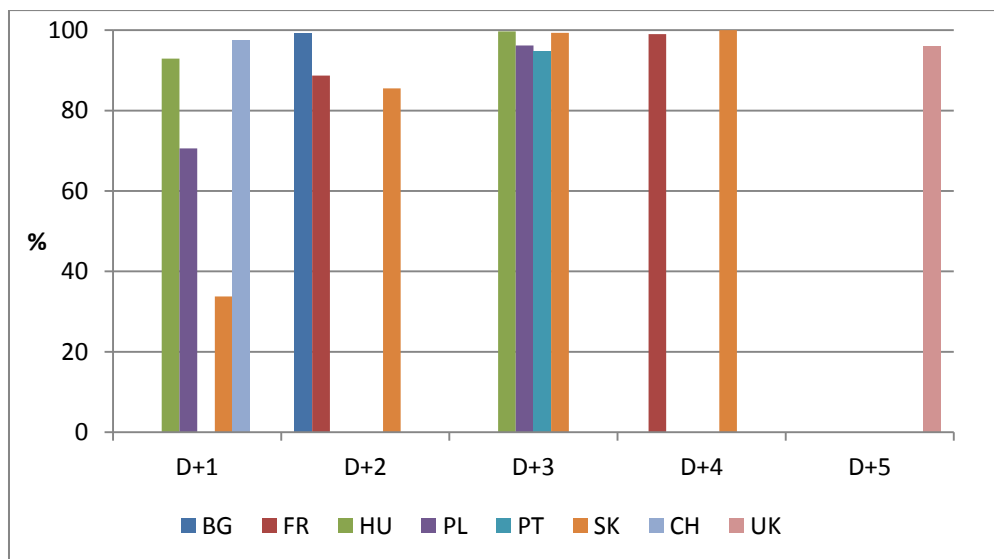


4.1.3. Measurement of the domestic transit time for parcels with the track and trace system TR 15472

Technical report TR 15472 (measurement of the domestic transit time for parcels with the track and trace system) is fully or partly implemented in just 4 countries (Belgium, France, Former Yugoslav Republic of Macedonia, Slovenia). Different countries also mentioned other measurements, not following requirements of TR 15472, such as:

- Through reporting forms on the basis of supporting documents and impressions of date-stamp.
- Parcels with electronic stamping.
- The real data are evaluated afterwards by the operation documents.
- As regards the requirements for EN 13850 and EN 14508.
- A scientifically recognized sampling method is applied for the measurement of parcel delivery times.
- Standard retail parcels.

Figure 8 - Results 2011 for domestic transit time for parcels (D+1....D+5)¹⁷



4.1.4. Measurement of loss and substantial delay of priority and first-class mail using a survey of test letters - TS 14773

Technical specification TS 14773 (measurement of loss and substantial delay of priority and first-class mail using a survey of test letters) is implemented in 2 countries, namely Denmark and Portugal are partly compliant with the technical specification.

The publication of the volume of lost mail by the USP is also different in many countries. The majority of USPs do not have to publish any information of lost mail. In 6 countries (Denmark,

¹⁷ In Portugal measurement is not done based on TR 15472.



Estonia, France, Former Yugoslav Republic of Macedonia, Portugal, Switzerland) the USP has to publish information about lost mail annually.

Concerning other relevant indicators to measure loss of mail we would like to mention the approach in Hungary and Portugal:

Table 6 - Country case Hungary and Portugal

<p>Hungary:</p> <p>1. Regarding registered items in the domestic service the postal service provider shall fulfil the following requirement for the ratio of registered items fully or partly lost or damaged to the total number of registered items accepted in the course of provision of the postal service: $E/F \leq 0.06$ per thousand where E = number of registered items fully or partly lost or damaged; F = total number of registered items accepted in the course of provision of the postal service. Result in 2010: 0.0388 per thousand.</p> <p>2. About the US the number of lost items is reported in these categories: Letter, DM, Printed matter, Postal parcel, Telegram, Official letter (registered item with special acknowledgement. Besides this there are cross categories of special services such as: Registered, Insured, Not-insured and Acknowledgement.</p> <p>Portugal: Non-priority mail not delivered within 15 working days (per thousand letters): 2009 – Target: 1.4‰; Result: 2.1‰; 2010 – Target: 1.4‰; Result: 1.9‰.</p>

4.1.5. Other relevant indicators related to measurement of transit time

NRAs also mentioned the following other relevant indicators for the measurement of transit time:

- the measurement of single piece items of registered mail items,
- the measurement of incoming cross-border mail letters,
- the measurement of transit time for domestic newspaper and periodicals,
- the measurement of domestic transit time for postal money orders.

4.1.6. Corrective measures in case of non-compliance with the quality of service target.

For letters, NRA has measures in place to deal with non-compliance with the quality of service targets mentioned before for the USP in 26 countries.

Table 7 - Corrective measures in case of non-compliance with QoS target for USP: Letters

Answer	Count	Country	%
Yes	26	AT, BE, BG, HR, CY, DK, EE, FI, FR, FYROM, DE, EL, HU, IE, IT, LT, MT, NL, NO, PT, RO, RS, SK, SI, CH, UK	84%
No	5	CZ, LV, LU, PL, SE	16%



Table 8 - Country case Hungary

Hungary:

By virtue of Article 68 of the Communication Act the Authority shall apply sanctions progressively, depending on the severity of the infringement. Besides this, by virtue of Article 6 of the Ministerial Decree 13/2004. (IV. 24.) IHM the Authority may

- a) require the service provider to supply additional data on service quality;
- b) oblige the postal service provider to inform the postal service users about the actual figures of service quality;
- c) require the postal service provider to conduct regular service quality tests and inspections;
- d) conduct regular or ad hoc on-site inspections or have them conducted at the postal service provider.

For parcels, NRAs have measures in place to deal with non-compliance with the quality of service targets mentioned before for the USP in 13 countries.

Table 9 - Corrective measures in case of non-compliance with QoS target for USP: Parcels

Answer	Count	Country	%
Yes	13	AT, BG, DE, HU, IT, MT, NO, PT, RS, SK, SI, CH, UK	42%
No	18	BE, HR, CY, CZ, DK, EE,, FI, FR, FYROM, EL, IE, LV, LT, LU, NL, PL, RO, SE	58%

Corrective measures in case of non-compliance with QoS target for USP are more established for letters than for parcels.

As corrective measures concerning non-compliance the NRAs mentioned:

- financial sanctions
- new designation/tender
- rectification/ improvement actions
- recommendations
- legal attempt
- criticism
- progressive improvement scheme
- collective compensation scheme
- impact on the pricing scheme
- regular or ad hoc on-site inspections

The most often used and mentioned corrective measurement was a financial sanction (fine).

The corrective measures concerning non-compliance are described in postal law, a combination of postal law and secondary legislation, secondary legislation and NRA decisions. The issue is mostly dealt with in the postal Act or in a combination of the postal Act and the secondary legislation.

In 11 countries different sanctions were realised once, in Ireland, Romania and the Netherlands recently.



Table 10 - Countries case Ireland, Romania and the Netherlands

Ireland: In 2012 the Irish NRA has initiated legal proceedings against An Post (USP) in relation to its compliance with a direction in respect of the quality of the universal postal service¹⁸.

Romania: In 2010 an administrative fine was imposed to the USP.

The Netherlands: In case the target is not met OPTA may issue a binding instruction to the USP. Non-compliance with such a binding instruction may be sanctioned by a fine. OPTA might also impose a ‘charge under penalty payment’ but this instrument is unsuitable for enforcing this kind of legal requirement. OPTA has therefore deemed this legal construct not effective in the Dutch legal system and has urged the Ministry to establish the possibility to directly fine a contravention of the target requirement. A legislative proposal to that effect is currently pending before Parliament.

4.1.7. Conclusions

Based on our research -, ERGP can make the following conclusions:

- EN 13850 is the most commonly used standard to measure the quality of transit time. Because EN 13850 is mandatory, it is the most important indicator of the postal quality. Also, EN 13850 allows taking into account the national peculiarities.
- The corrective measure that is most often used and mentioned by NRAs is a financial sanction.
- Concerning corrective measures to deal with non-compliance on QoS target, NRAs also mentioned, next to the financial sanction, publications, warnings and recommendations.
- Corrective measures are more established for letters than for parcels.

¹⁸ For more information: <http://www.comreg.ie/fileupload/publications/PR30052012.pdf>



4.2. Collection and delivery

The Universal Service guarantees one clearance and delivery on each working day, in urban and rural areas. Concerning delivery, in Article 3 of the Directive 97/67/EC as amended by Directive 2008/6/EC of the European Parliament and of the Council of 20 February 2008 it is said:

“Member States shall take steps to ensure that the universal service is guaranteed not less than five working days a week, save in circumstances or geographical conditions deemed exceptional, and that it includes as a minimum:

- one clearance,

- one delivery to the home or premises of every natural or legal person or, by way of derogation, under conditions at the discretion of the national regulatory authority, one delivery to appropriate installations.’

Any exception or derogation granted by a national regulatory authority in accordance with this paragraph must be communicated to the Commission and to all national regulatory authorities.”

4.2.1. Requirements on the frequency of collection and delivery relating to the universal service

Collection and delivery are two parts of one overall process that are indissolubly linked, therefore they will be analyzed in parallel as far as possible.

The frequency of collection and of delivery in up to 68% of the countries is 1 collection/delivery per day and 5 collections/deliveries per week for correspondence and for parcels. The number of countries with 6 days mode of collection is almost 5 times less, while the number of countries with 6 days mode of delivery is 4 times less. There are 23% of the countries with "other" modes of collection and 13% with "other" modes of delivery. "Other" means different number of collections/deliveries per day and per week, depending on the location (Lithuania) or on the presence or absence of sorting centres (Bulgaria); partial or no requirements, difference between requirements and reality (Switzerland – 5 collections/deliveries per law, 6 - per reality for priority letters in US).

The example below illustrates the relationship and interdependence between collection and delivery on the one hand and quality of service on the other hand.

Table 11 - Country case Germany

Germany: ... Letter boxes shall be emptied every working day and, depending on requirements, on Sundays and bank holidays, as frequently as is needed to comply with the quality standards ...

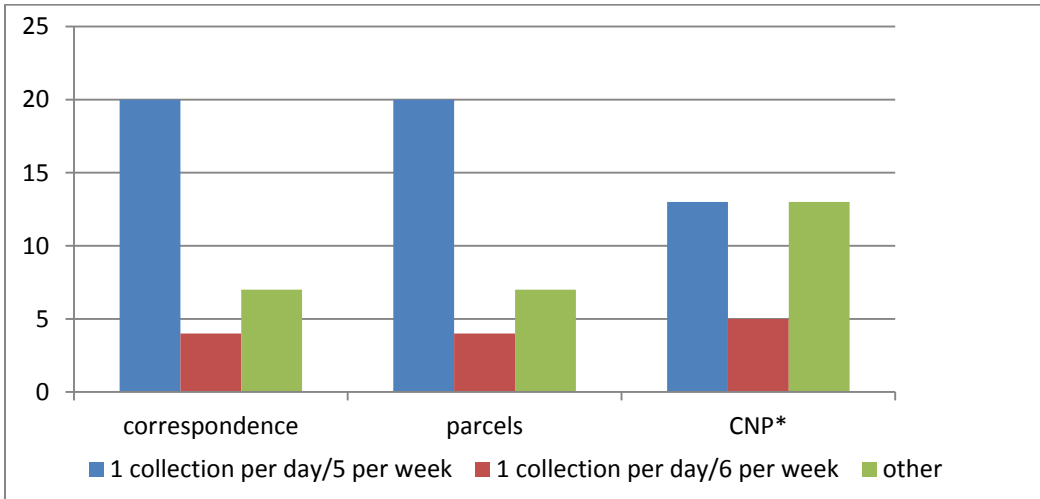
The tables below show that the mode of collection is the same for correspondence and for parcels, but different for the group of catalogues, newspapers and periodicals (CNP). The picture is identical as regards the mode of delivery.

The tables show also more clarity in respect to delivery for correspondence and for parcels – the percentage of the countries with “other” modes of delivery is clearly lower than this of the countries with “other” modes of collection.



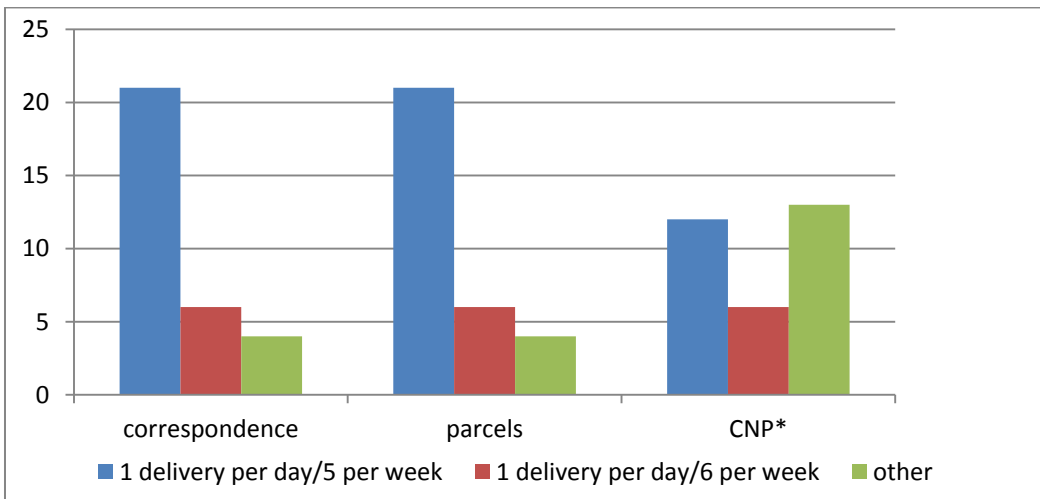
Concerning the group of CNP we have to bear in mind that not all types of items in this group are included in the scope of the universal service in different countries, therefore not all of them are regulated. Moreover differences can be observed with respect to the requirements, which are more stringent concerning newspapers compared to other periodicals and catalogues.

Figure 9 – Number of collections/per week relating to the universal service



* catalogues, newspapers and periodicals

Figure 10 – Number of deliveries per week relating to the universal service



* catalogues, newspapers and periodicals



4.2.2. Exceptions to the guaranteed frequency of collection and delivery

Exceptions have been granted in many countries regarding frequency of collection and delivery. The percentage of indicated granted exceptions to the guaranteed frequency of delivery is higher than this of the exceptions to the frequency of collection, which is clearly visible on the graph below.

Figure 11 - Exception to the guaranteed frequency of collection and delivery

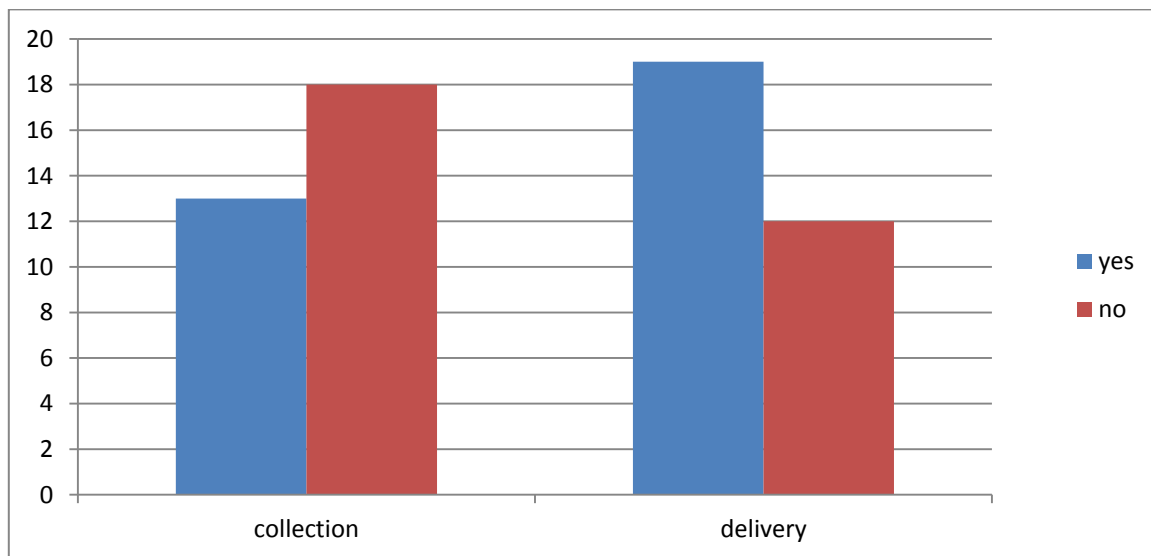


Table 12 – Country-specific information regarding the exception for the guaranteed frequency of collection and delivery

Question	Answer	Count	Country	%
Exceptions to the guaranteed frequency of collection	Yes	13	BG, CH, CY, DK, EE, EL, FL, FR, FYROM, IT, RO, RS, UK	40%
	No	19	AT, BE, HR, CZ, DE, ES, HU, IE, LV, LT, LU, MT, NL, NO, PL, PT, SE, SI, SK	60%
Exceptions to the guaranteed frequency of delivery	Yes	20	BG, CH, CY, DK, EE, EL, ES, FL, FR, HR, IT, LT, NO, FYROM, RO, RS, SE, SI, SK, UK	62%
	No	12	AT, BE, CZ, DE, HU, IE, LV, LU, MT, NL, PL, PT	38%

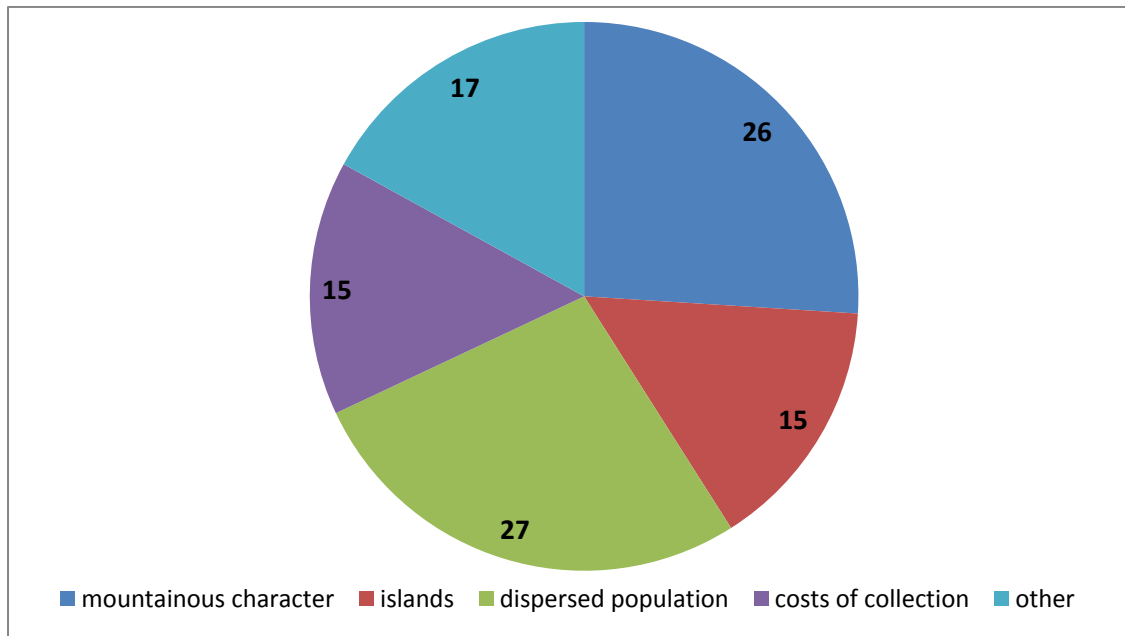
Two countries have cited only one reason for the exceptions both for collection and delivery. For the rest of the countries the reasons are complex, i.e. include more than one reason.

The most frequently mentioned reasons for the exceptions are, as follow:

- mountainous character of the territory;
- dispersed population;
- islands;
- costs of collection/delivery



Figure 12 – Reasons for exceptions regarding collection and delivery



There are various other reasons listed: special geographic conditions (other than the mountainous character), lack of regular public transport, road infrastructure, difficulty of access, insufficient number of items – each of these reasons is related to the costs of collection/delivery. National and state holidays, weather, situation from the past – tradition is also named.

Table 13 - Country cases - Finland and Switzerland

Finland: Exceptions can be granted in situations where a household is situated in difficult terrain in an archipelago or wilderness area and not located by a road that can be driven all year round, including road ferry routes and routes usable with the aid of ferries running at least five days a week. The number of households subject to this deviation may not exceed 300 in the whole country.

Switzerland: Under disproportional difficulties arising from delivery the USP has the possibility to hand out postal items to the next collection point or to reduce the frequency of delivery.

Most often these requirements can be found in the legislation, less in regulations/decisions issued by the NRA, in the licence of the USP, in Guidelines or Directions.



4.2.3. Monitoring of compliance with the requirements

In the majority of the cases – over 80% - the task of monitoring compliance with the requirements is appointed to the NRA, while in Serbia – to the competent Ministry. In France it is up to both NRA and the Ministry. In 2 cases – Ireland and United Kingdom – an independent external body does the monitoring.

The answers of the question on how monitoring is done are almost equally distributed between control through inspections, reaction on complaints and the obligation of the USP to report. Monitoring of articles in the media can also help in this area. Generally more than one of these tools is used.

4.2.4. Consequences in case of non-compliance with the requirements

Table 14 - Consequences in case of non-compliance with the requirements

Question	Answer	Count	Country	%
Are there any consequences in case of non-compliance with the requirements?	Yes	25	AT, BE, BG, CY, CZ, DE, EE, EL, ES, FL, FR, HR, HU, IE, IT, LV, LU, MT, NL, NO, PT, RO, RS, SI, SK, UK	81%
	No	6	CH, DK, LT, PL, FYROM, SE	19%

The table above shows that 81% of the countries have provided for consequences in case of non-compliance with the requirements. As a general rule, first corrective measures are required which are possibly followed by a fine is imposed. In Slovenia, apart from the fine, the NRA can decline the number of exceptions. In Cyprus the non-compliance may even lead to withdrawal of the licence.

Table 15 - Country cases - Hungary and Ireland

<p>Hungary: The Authority shall apply the following sanctions progressively, as consistent with the severity of the infringement and taking into account other important circumstances:</p> <ul style="list-style-type: none"> - adopt a cease and desist order; - impose a fine in an amount prescribed in details in the respecting Act; - has its resolution on establishing an unlawful conduct published on the website of the service provider or in a press product at the cost of the offender, which may be a daily newspaper of nationwide circulation. <p>Ireland: The Communications Regulation (Postal Services) Act 2011 provides that following notification to the USP of its non-compliance and allowing the opportunity for it to respond/remedy its non-compliance, the NRA may apply to the High Court for an order directing the USP to comply with the targets.</p>
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4.2.5. Percentage of the population affected by the exceptions to the guaranteed frequency of collection and delivery

Table 16 - NRAs collect data on the percentage of population affected by the exceptions to the guaranteed frequency of collection and delivery

Question	Answer	Count	Country	%
Does the NRA collect data on the percentage of the population affected by the exceptions to the guaranteed frequency of collection and delivery?	Yes	11	BG, CH, EL, ES, FI, HR, RS, SE, SK, SI, UK	34%
	No	21	AT, BE, CY, CZ, DE, DK, EE, FR, HU, IE, IT, LV, LT, LU, FYROM, MT, NL, NO, PL, PT, RO	66%

4 out of the 11 “NRAs who answered “yes” (Bulgaria, Greece, Slovakia and Slovenia) collect data on the percentage of population affected by the exceptions to the guaranteed frequency of collection and delivery; 1 NRA (Croatia) collects data on the percentage of households affected by the exceptions; 2 other NRAs’ (Finland and Serbia) – on the number of households; Switzerland – on the number of houses; Sweden – on location of household, reason for exception, frequency of delivery if not 5-day, alternative delivery solution.

In United Kingdom 3013 delivery exceptions have been granted to the USP in 2011. In Bulgaria, Slovakia and Slovenia less than 1% of the population is affected by the exceptions from daily delivery. In Serbia statistics show that 76% of the population receives items each day, 17% - 2 or 3 times per week and 7% - once a week. In Finland the number of households affected by the exceptions is 121.

4.2.6. Differences in collection and/or delivery between geographic areas

Table 17 - Are there any differences in collection and/or delivery between geographic areas

Question	Answer	Count	Country	%
Are there any differences in collection and/or delivery between geographic areas (e.g. rural and urban areas)?	Yes	9	CH, EE, EL, ES, HR, HU, RS, SE, UK	29%
	No	22	AT, BE, BG, CY, CZ, DE, DK, FL, FR, IE, LV, LT, LU, FYROM, MT, NL, NO, PL, PT, RO, SK, SL	71%

Differences are reflected by the different numbers of collection and deliveries for urban and rural areas, as well as sometimes by the exemption from “at home” delivery in rural areas. In Sweden rural mail service implies delivery in collective letterbox installations along the mailman’s route at some distance from the premises of the recipients (in most cases within 200 meters) and Hungary along the mobile posts routes.



4.2.7. USPs' obligation to deliver mail within a specified time

Only in 2 countries the USP is under an obligation to deliver mail by a certain time: in Slovakia, where the USPs have to deliver mail up to 16.00 both in urban and rural areas, both for households and businesses. In the United Kingdom the USP aims to deliver mail by 15.00 in urban areas and by 16.00 in rural areas.

4.2.8. Delivery of parcels

Most often the delivery of parcels occurs at the premises of the addressees or at the post office, offering different variations among countries. In case of failed delivery (after 1 or 2 attempts) a notice is left to the addressee in order to pick up the parcel from the post office. In Norway and Switzerland, when parcels are too big to be put in the mail box, they have to be collected at the post office. It can also be a limit for weight (Romania), i.e. parcel with a certain weight is delivered at the address, but over this limit – at the post office. Croatian USP typically deliver parcels to the address in urban area, while in rural area they leave a notice of delivery and the addressee has to pick up the parcel at the post office.

Table 18 - Country case - Poland

<p>Poland: The postal parcel is delivered to the addressee at the address indicated on the postal item or within the agreement on provision of postal services.</p> <p>In case of insured items (incl. postal parcels) exceeding the threshold value of a postal item, delivery shall be made by leaving a notice of arrival of a postal item, including the information on the collection place and time limit. In case of postal parcels weighing over 2,000 grams, insured items the value of which exceeds the threshold value of a postal item, postal items charged with customs duty, accepted for transport and delivery beyond the local postal area, the delivery may be made by leaving a notice of arrival of a postal item, including the information on the collection place and time limit.</p>

4.2.9. Alternative ways of delivery of parcels

Data has been collected about alternative ways of delivery of parcels, but there is not a big choice. If the delivery occurs normally at the post office, the alternative is delivery at home at an additional charge. Other possible solutions are parcel boxes and local shops.

The main prevailing reason for alternative ways of delivery of parcels is financial – costs of delivery.

Other reasons include:

- dispersed population;
- commercial choice of postal service providers;
- lack of accurate address system and signs;
- inability to deliver at the normal address;
- specific agreement with the customer;
- situation from the past – tradition.

In most of the countries, where information is available, all kinds of parcels (e.g. domestic, international, insured) can be delivered in alternative ways. Notwithstanding there are exceptions related to the weight and dimensions (Luxembourg, Switzerland). In France only regular parcels (not registered) are subject to alternative ways of delivery. In Greece different ways of delivery are used



ERGP (12) 30 – report on QoS and end-user satisfaction depending of the type of the parcel and the price paid for it. In Serbia all international parcels are delivered to the customers home address, whereas domestic parcels are delivered in an alternative way, depending on whether the delivery is charged or not.

4.2.10. Collection of data on the volumes of correspondence/parcels delivered in alternative ways

There are only 3 NRAs from 31 – less than 10% - which collect data on the volumes of correspondence/parcels delivered in alternative ways, namely:

- Portugal - on the volumes of correspondence/parcels delivered in “Curbside“ (boxes located at the street, at some distance from the home or premises);
- Slovenia - on the volumes of correspondence delivered in detached mailboxes;
- Spain - on the volumes of correspondence/parcels delivered in “Curbside” (individual or grouped mailboxes located at the street, at some distance from the home or premises) in “special environments”.

The same NRAs in addition with Greece collect data on the percentage of population serviced in alternative ways: the 3 NRAs – in the above-mentioned cases, Greece – on the population served by rural postmen and by cluster letterboxes.

The NRAs have been asked if there is a link between exceptions from daily delivery and alternative ways of delivery. Three NRAs – Greece, Slovakia and Switzerland - mentioned that such link exist. Greece explains further that exceptions from daily delivery usually regard remote rural areas that are scarcely populated and, therefore, in most cases, they are served by rural postmen.

Additional information has been provided concerning exceptions from daily delivery and alternative ways of delivery. Country cases of Slovakia and Spain illustrate this.

Table 19 - Country case – Slovakia and Spain

<p>Slovakia: For addressees who live in places with exceptions from daily delivery, the delivery is ensured by:</p> <ul style="list-style-type: none">a) delivery at least twice a week in the nonsequential days (only par. 4 c) to f) of this article),b) delivery at least three times a week (only par. 4 g) of this article),c) delivery to the delivery boxes (according to par. 7) of this article),d) taking items away from the post office,e) other ways that customers agreed upon with the universal service provider in accordance to the postal conditions. <p>Spain: Curbside (individual or grouped mailboxes located at the street, at some distance from the home or premises) in “special environments”:</p> <ul style="list-style-type: none">• In the case of isolated dwellings or when located in environments classified as disseminated and located more than 250 meters from the road used commonly by any public service.• In an environment of great development of construction and low population density, meaning by such developments horizontal construction, which are single or grouped dwellings, industrial premises or other individual building, when:<ol style="list-style-type: none">1. The population is equal or less than 25 per hectare.2. The number of dwellings or premises is equal to or less than 10 per hectare.3. The volume of ordinary items does not exceed 5 per week and per household (on an annual calculation basis). <p>Grouped mailboxes in the following special environments,</p> <ul style="list-style-type: none">• Markets, shopping and services malls• Residential complex of buildings or industrial areas that have a single address number <p>Both: when agreed upon between the USP and the recipients.</p>
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4.3. Access points

Article 2of the Directive 2008/06/EC defines **access points** as

“ physical facilities, including letterboxes provided for the public either on the public highway or at the premises of the postal service provider(s), where postal items may be deposited with the postal network by senders.”

4.3.1. Collection letterboxes

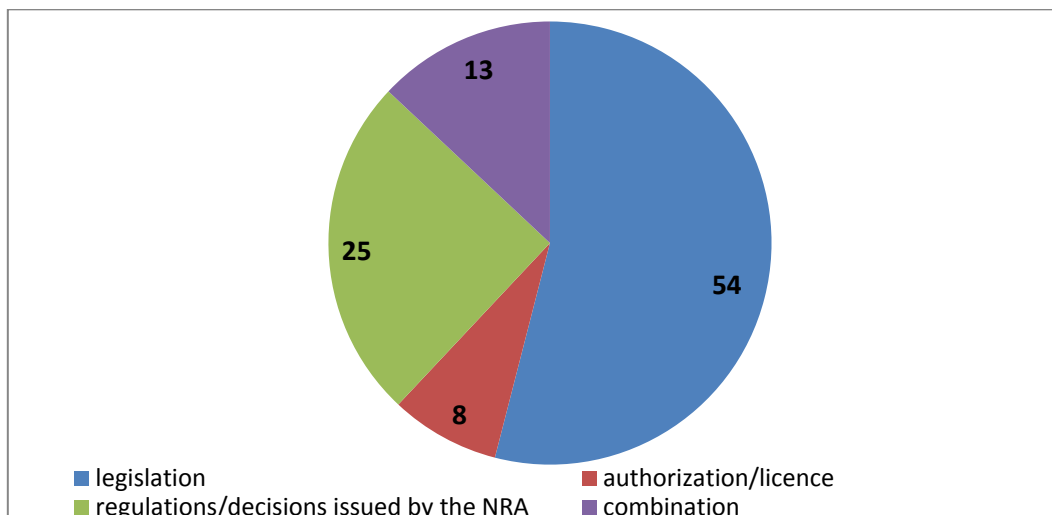
To this end the majority of responding countries (78%) have set requirements/standards to ensure that an adequate number of collection letterboxes are provided by the USP.

Table 20 - Requirements/standards to ensure an adequate number of collection letterboxes

Question	Answer	Count	Country	%
Requirements/standards to ensure an adequate number of collection letterboxes	Yes	25	AT, BE, BG, CY, CZ, DE, DK, EE, EL, HR, HU, IE, IT, LV, LT, FYROM, MT, NL, NO, PL, RO, RS, SK, SI, UK	78%
	No	7	CH, ES, FL, FR, LU, PT, SE	22%

As shown in the figure below, requirements can be found in:

Figure 13 - Where are the requirements/standards to ensure an adequate number of collection letterboxes defined?



The applicable criteria to ensure an adequate number of collection letterboxes that are most often mentioned are the following:

- number of collection letterboxes per locality;
- one collection letterbox per number of inhabitants depending on the type of the settlement (difference is marked between urban and rural areas);
- maximum distance that one has to travel to the collection letterbox;
- maximum (air) distance between neighbor collection letterboxes;



ERGP (12) 30 – report on QoS and end-user satisfaction

In addition, there are different combinations of the above criteria. It should be noted that in the requirements of many countries there is a difference in the criteria for urban and rural areas. Furthermore, criteria vary from one country to another.

An interesting point of view is offered by Denmark whereby the USP is imposed to keep “a suitable number” of collection letterboxes (politically defined). A similar provision exists also in Norway.

Concerning this point we would also like to mention the handling in Austria, Czech Republic, Malta and the United Kingdom.

Country cases 21 – Austria, the Czech Republic, Malta and the United Kingdom

Austria: The universal service provider shall be obligated to ensure an adequate, comprehensive supply of letterboxes and other installations for collecting postal items. User needs may not be impaired by a decline in the number of letterboxes. In densely settled residential areas there shall be sufficient letterboxes available so that, as a rule, users are able to access a letterbox within a maximum of 1,000 metres of their residence. The installation of new letterboxes shall also take the needs of mobility-restricted persons into account.

Czech Republic: Number of inhabitants in the area max. 1 000 at least 1 letterbox;
 Number of inhabitants 1 001 to 10 000 - 1 letterbox for each thousand inhabitants;
 In areas with more than 10 000 inhabitants - from each point max. distance 750 m to the nearest letterbox.
 In each residential area, where there is a higher demand (tourist districts), the USP has to gross up the number of letterboxes.

Malta: i. There should be a letterbox as near to each town or village centre as practical from which collection is made six (6) days a week (i.e. Monday to Saturday, excluding public holidays) to secure next day delivery nationwide.
 ii. In addition to the availability of letterboxes as described in (i) above, in localities where the population density is higher than the national average not less than 98% of users or potential users of postal services should be within 400 metres of a letterbox.
 iii. In addition to the availability of letterboxes as described in (i) above, in localities where the population density is lower than the national average not less than 98% of users or potential users should be within 800 metres of a letterbox. The Communications Regulation (Postal Services) Act 2011 provides that following notification to the USP of its non-compliance and allowing the opportunity for it to respond/remedy its non-compliance, the NRA may apply to the High Court for an order directing the USP to comply with the targets.

UK: In each Postcode Area (PCA) where the delivery point density is not less than 200 delivery points per sq k no less than 99% of users of postal services are within 500 m of a post office letter box.

In all countries collection time is marked on the collection letterboxes or the latest time of posting (LTOP) is displayed on the collection letterboxes.

Table 22 - Checking the on-time emptying of collection letterboxes

Question	Answer	Count	Country	%
Checking the on-time emptying of the street letterboxes	Yes	10	BE, BG, DE, HU, IE, LV, MT, RS, SK, SL	31%
	No	22	AT, CH, HR, CY, CZ, DK, EE, EL, ES, FL, FR, IT, LT, LU, FYROM, NL, NO, PL, PT, RO, SE, UK	69%

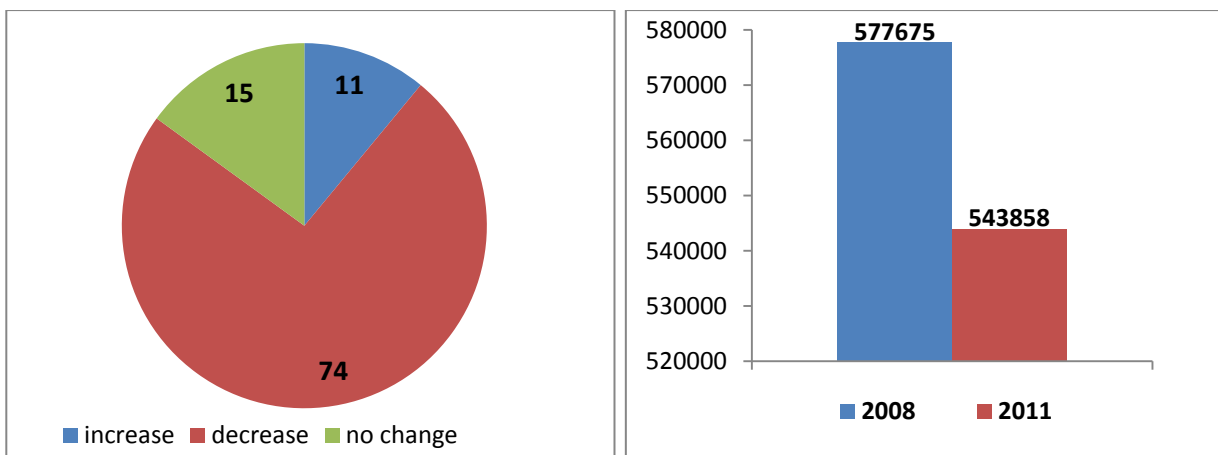


ERGP (12) 30 – report on QoS and end-user satisfaction

Monitoring is provided if the clearance time indicated on the letterboxes is respected in almost one third of the countries. The method of checking the on-time emptying of the street letterboxes is usually by means of an electronic control system.

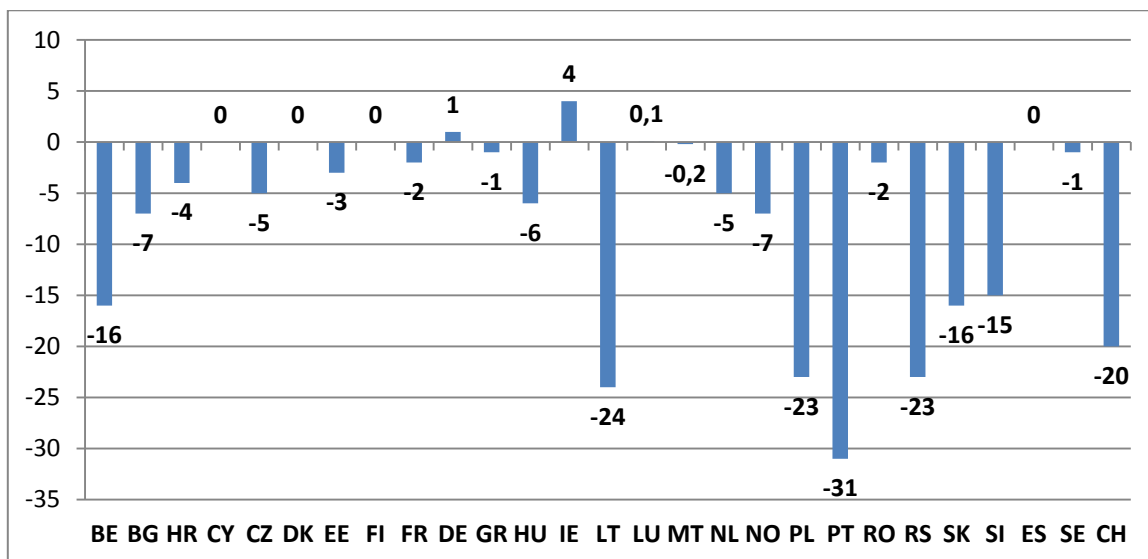
Furthermore information has been collected regarding the evolution in the number of collection letterboxes since 2008 (end of 2008 /end of 2011). Figures below indicate that although in some countries a growth is registered or no changes have occurred, in general the evolution has a minus sign.

Figure 14 - Evolution in the number of collection letterboxes from 2008 till 2011



Analysis of the data provided by the NRAs indicates that the decreasing trend is most distinctive in 4 countries – with more than 20%, the most significant drop being in Portugal - -31%. The growth in 3 countries at most by 4% is not enough to compensate the drop in other countries.

Figure 15 – Percentage change in the number of collection letterboxes per countries from 2008 till 2011



IE= Figures provided in the USP annual report



The main reasons for this decrease referred to reduction and/or migration of the population in some locations, which, combined with decrease of the letter mail volumes, need an optimization/reorganization of the number and location of the collection points. Cost reduction is another important reason, closely tied to the previous. Specific local conditions are also mentioned.

4.3.2. Points of contact

In Article 3, 2 of the Directive 2008/06/EC is said about points of contact

“Member States shall take steps to ensure that the density of the points of contact and of the access points takes account of the needs of users.”

Those points of contact may be managed directly by postal operators (postal establishments) or be managed by third entities (such as retail stores...) or correspond to services directly provided by the mailman.

Keeping in mind the above-mentioned provision, Member States should ensure that sufficient access points are established taking into account users’ needs in order to satisfy the universal service obligation. It is also important to assure equal treatment of users in urban and rural areas and without prejudice of geographical conditions.

It is a difficult task to evaluate whether the density of access points corresponds to the necessary equilibrium between users’ needs and at the same time to the cost-efficient provision of the universal service. Post offices have an important social function and quite often they are seen as a last stronghold of the state in the small villages, so the density of the access points is a particularly sensitive issue.

The percentage distribution (on the table below) of the answers concerning the existence of requirements/standards to ensure an adequate number of points of contact / postal establishments is the same as to the question on collection letterboxes, but the countries that do or do not have requirements are not exactly the same, i.e. some of the countries having requirements for collection letterboxes do not have requirements concerning the number of points of contact/postal establishments and vice versa.

Table 23 – Requirements/standards to ensure an adequate number of point of contacts/postal establishments

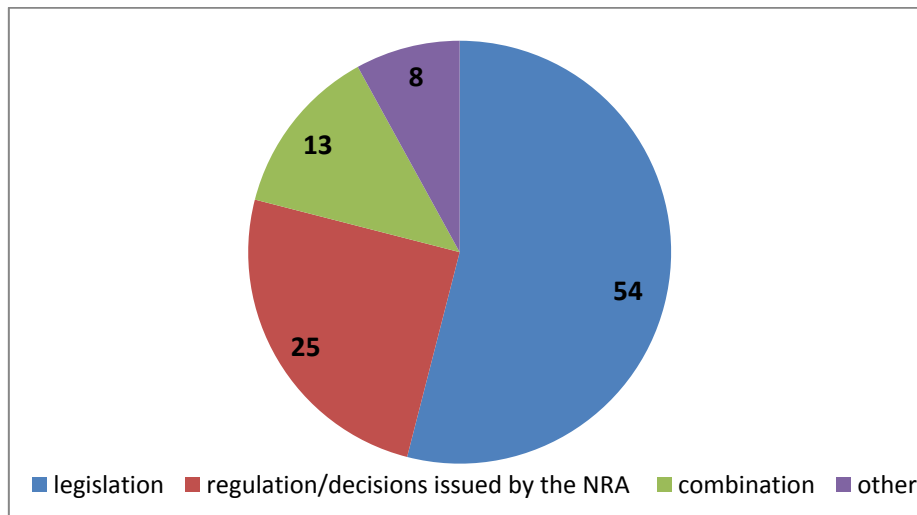
Question	Answer	Count	Country	%
Requirements/standards to ensure an adequate number of point of contacts/ postal establishments	Yes	25	AT, BE, BG, CH, CZ, DE, DK, EE, EL, FL, FR, HR, HU, IT, LV, LT, FYROM, MT, NL, NO, PL, RO, RS, SI, SK	78%
	No	7	CY, ES, IE, LU, PT, SE, UK	22%

In 54% of the countries that have such requirements, they can be found in the legislation; in 25% of the countries requirements are contained in regulations/decisions issued by the NRAs; in 13% of the countries they are set out usually first in the legislation, than in the Authorisation/Licence of the USP or in another act of secondary legislation. Exceptions are Belgium, where the requirements can be



found in the management contract between the State and bpost and Switzerland with Government’s commentary to the legislation.

Figure 16 – Where are the requirements/standards to ensure an adequate number of point of contacts/postal establishments defined



Part of the applied criteria for an adequate number of point of contacts/postal establishments repeats these for an adequate number of collection letterboxes, namely:

- number of postal establishments per locality;
- one postal establishment per number of inhabitants, that could depend on the size of the settlement. Differences between rural and urban areas also is not an exception;
- maximum distance that one has to travel to the nearest postal establishment;
- maximum (air) distance between neighbor postal establishments.

In addition to these common criteria other can be cited:

- minimum number of post offices, providing UPS or full range of postal services;
- percentage of population at certain distance from the postal establishment.

The more stringent requirements are indicative of the attention being given to this issue. As a rule a combination of criteria is used, which vary from country to country depending on the geographic and demographic differences and/or on some other reasons. We would like to mention as examples the regulations in France, Germany, Poland and Switzerland, showing the existing diversity.

Table 24 – Country cases – Austria, France, Germany, Poland and Switzerland

Austria: Comprehensive provision of postal service points shall be deemed given as long as there are at least 1,650 postal service points available to users throughout the Federal Territory. In communities of more than 10,000 residents and in all district capitals for at least 90% of the population access to a postal service point shall be ensured at a maximum distance of 2,000 metres, or in all other areas at a maximum distance of 10,000 metres.



France: In particular, contact points with the public providing access to universal postal services other than bulk items and to information about these services has to be permanently available to at least 99% of the national population or to at least 95% of the population of each department, i.e. the contact point has to be less than 10 kilometres away, and that all communes with more than 10,000 inhabitants have to have at least one contact point for every 20,000 inhabitants.

Another law related to the public services states that the network has to comprise at least 17,000 contact points distributed throughout French territory, taking account of its specific conditions, in particular in the Overseas Departments and Territories. Unless there are exceptional circumstances, the rules cannot permit more than 10% of a department’s population being more than five kilometres and a twenty-minute drive, under the traffic conditions prevailing in the territory concerned, from the nearest La Poste contact point.

Germany: Across the country there has to be a minimum of 12,000 fixed-location facilities. In every community of more than 4,000 inhabitants there shall be at least one fixed-location facility; as a rule, this also applies to communities that have the function of a central location under regional planning provisions. In principle it shall be guaranteed that in urban areas, customers are not farther than 2,000 metres from their nearest fixed-location facility. All other locations shall be serviced by a mobile facility.

Poland: At least 8,240 operator’s points of contact shall be established across the country and located taking into account the demand for services in a particular area.

One point of contact of the operator shall, across the country, cover on average:

- 1) 7,000 inhabitants in urban areas;
- 2) each area of 85 km² in rural areas.

At least one point of contact of the operator shall be established in each gmina.

In case of gminas of over 5000 inhabitants it shall be allowed to cover the gmina by the operation area of the operator’s point of contact located in the area of a neighbouring gmina or to establish a mobile point of contact, provided that:

- 1) such location shall ensure a more efficient customer service to clients residing in the area handled by this point of contact;
- 2) such location has been agreed with the relevant head of the gmina (mayor of the city).

Switzerland: Accessibility indicator: 90% of the whole population has to have access within 20 minutes by public transport or within walking distance to the next post office.

Besides the requirements on the adequate number of postal establishments in over half of the countries requirements have been laid down concerning the opening hours. Most often they are subject to the secondary legislation – regulations/decisions issued by the NRA or regulations of the USP, ordinances, government decrees and management contracts.

Table 25 – Requirements/standards concerning the opening hours of the postal establishments

Question	Answer	Count	Country	%
Requirements/standards concerning the opening hours of the postal establishments	Yes	17	AT, BE, CY, CZ, DE, EE, FR, HR, HU, IT, LU, MT, FYROM, RO, RS, SI, SK	53%
	No	15	BG, CH, DK, EL, ES, FL, IE, LV, LT, NL, NO, PL, PT, SE, UK	47%



ERGP (12) 30 – report on QoS and end-user satisfaction

Basically they determine the number of working days; earliest and latest opening time; full time, part time and extended working time, which is often tied to the number of inhabitants.

The examples of Hungary and Slovakia illustrates very detailed requirements in this direction.

Table 26 – Country cases – Austria, Hungary and Slovakia

Austria: As a rule, postal service points shall be opened daily on at least 5 working days per week, with the exception of postal service points run externally by a municipal office and open at least a total of 15 hours on three work days per week. Postal service points’ hours of operation shall take user needs at the respective location into account; they may also be extended to include Saturdays, Sundays and holidays or evening hours. Based on a 5-day week, the weekly hours of operation may not be fewer than 20 hours; this shall not apply to the postal service points which were open fewer than 20 hours upon this Federal Act’s entry into force.

Hungary: Postal service points with less than two hours of daily service will not be considered as permanent postal service points.

(4) The permanent postal service points operated by the universal postal service provider and the licensed postal service provider shall offer at least two hours of daily service between 07.00 and 20.00. At towns with at least fifteen thousand inhabitants with a registered permanent residence at least one postal service point shall offer at least six hours of daily service on every working day of which one hour of service shall be before 08.00 or after 17.00.

Slovakia: At the post office in the residential unit / village, which has:

- a) less than 3 000 inhabitants or in the sub-region area, which has less than 5 000 inhabitants, the hours for the public on working days, in the morning and/or afternoon and not less than 3 hours every working day, are so that at least 1 times a week the offices are open to the public in the afternoon, or at least one day a week normally until 17:00 o’clock; the requirement can be fulfilled by using a divided working time
- b) from 3 001 to 5 000 inhabitants, the opening hours for the public during working days are at least from 8:30 to 15:00 o’clock, including technological and operational breaks or lunch breaks and at least one day a week up to 17:00 o’clock,
- c) from 5 001 to 10 000 inhabitants, the opening hours for the public during working days are from 8:30 a.m. to 16:00 o’clock, including technological and operational breaks or lunch breaks and at least one day a week up to 17: 00 o’clock,
- d) from 10 001 to 50 000 inhabitants, the opening hours for the public during working days are from 8:00 a.m. to 17:00 o’clock,
- e) over 50 000 inhabitants, the opening hours for the public in general, working days are from 8:00 to 18:00 o’clock, at the assigned post office from 7:00 o’clock.

Table 27 – Entity entitled to check compliance with the requirements concerning the number and opening hours of the postal establishments

Question	Answer	Count	Country	%
Entity entitled to check compliance with the requirements concerning the number and opening hours of the postal establishments	NRA	21	AT, BG, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IT, LV, LT, LU, MT, NL, FYROM, RO, SI, SK	78%
	NRA + Ministry	5	BE, FR, NO, PL, RS	18%
	Ministry	1	CY	4%

The surest way to monitor compliance with the above-mentioned requirements proved to be inspections/state control, although other instruments came into use – information from the USP is required annually or monthly; publicly accessible information is examined and analyzed, as well as consumer complaints.



ERGP (12) 30 – report on QoS and end-user satisfaction

Relevant entities in 23 countries are empowered to take measures in case of non-compliance with the requirements. As a rule measures are graded: first the USP is asked to comply with the requirements, after that a fine is imposed or a compensation is required. Another possibility is suggested by Greece.

Table 28 – Country case – Greece

Greece: The NRA re-examines the compliance with the terms of the agreement about Universal Services signed between the USP and the ministry at regular intervals. In case of non-satisfactory results the terms are redefined.

Table 29 - Prevention of the closure of postal establishments

Question	Answer	Count	Country	%
Is that entity empowered to prevent the closure of postal establishments?	Yes	10	AT, BG, EE, HR, MT, FYROM, PL, RS, SK, SL	42%
	No	14	BE, CY, CZ, DE, DK, EL, FL, FR, HU, LV, LT, LU, NL, RO	58%

Denmark has responded negatively to this question, nevertheless it should be mentioned that there exists a provision prohibiting the closure of postal establishment in specific cases.

Table 30 - Country case – Denmark

Denmark: In towns with a number of inhabitants between 2000 and 5000, the USP cannot close down a postal establishment unless a new such establishment is opened. In smaller towns and villages postal establishments cannot be closed down if the distance for the users to the next postal establishment is augmented with more than 10 km (as the crow flies).

In Article 3, 1 of the Directive 2008/06/EC is said

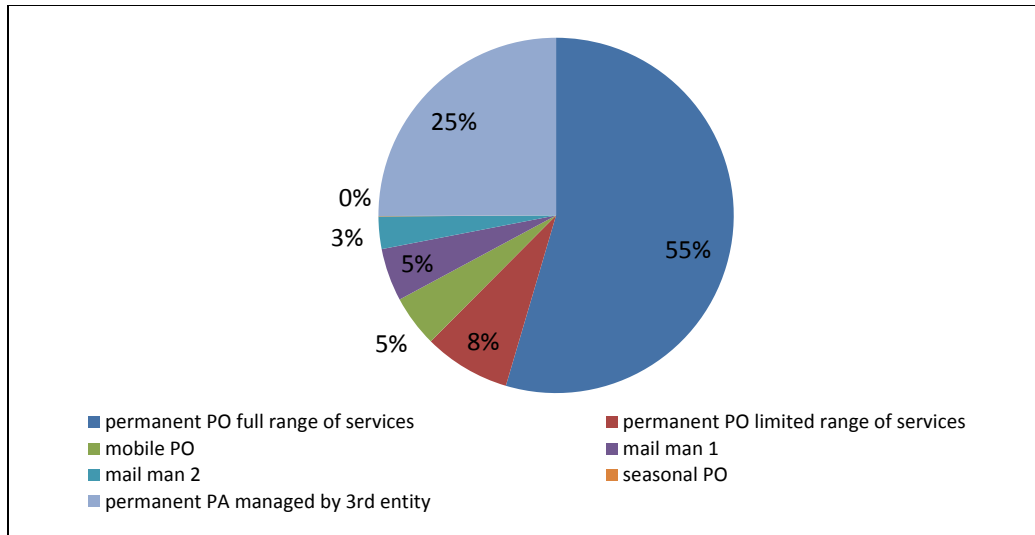
“Member States shall ensure that users enjoy the right to a universal service involving the permanent provision of a postal service of specified quality at all points in their territory at affordable prices for all users.”

Keeping in mind this provision of Directive, postal points of contact should be accessible really for all users, including disabled persons. It seems however that most of the countries do not have a clear view on this issue, because only 4 of them – Cyprus, Greece, Hungary and Luxembourg – have cited specific figures. Part of the countries pointed out that in principle all postal points of contact should be equipped for such an access, but in practice the number is not available.



ERGP (12) 30 – report on QoS and end-user satisfaction

Figure 17 - Percentage by type of points of contact



The most common type of point of contacts at European level without any doubt is the permanent post office with full range of services (presented in every European country except Sweden), then the permanent post agency managed by a 3rd entity, followed by the permanent post office with limited range of services and the mobile post office.



ERGP (12) 30 – report on QoS and end-user satisfaction

The table below illustrates the percentage of distribution of points of contacts in each of the countries that answered this question.

Table 31 - The percentage of distribution of points of contact in each country

	Permanent PO full range of services	Permanent PO limited range of services	Mobile post office (PO)	Mailman 1 ¹⁹	Mailman 2 ²⁰	Seasonal post office	Permanent PA managed by 3rd entity	Other
Austria	31.60%					0.30%	68.10%	
Belgium	49.64%						50.36%	
Bulgaria	51%	2%		47%				
Croatia	99.11%	0.53%				0.35%		
Cyprus	6%						94%	
Czech Rep.	33.13%	0.69%			65.48%		0.70%	
Denmark	65%						35%	
Estonia	82.69%	7.93%	0.25%				9.13%	
Finland	14%	6%					80%	
France	60%						40%	
Germany	65%	35%						
Greece	32.84%	1.33%	0.12%	34.06%		0.30%	31.35%	
Hungary	88.50%		11.50%					
Ireland	4.30%						95.70%	
Italy	100% ²²							
Latvia	96.65%		0.15%	3.20%				
Lithuania	82.30%	1.50%	16.20%					
Luxembourg	79%	15%					6%	
Malta	54%		2%				44%	
Netherlands	75%	25%						
Norway	6%		54%				40%	
Poland	75%						35%	
Portugal	30.20%		0.40%				69.40%	
Romania	19.88%	80%	0.12%					
Serbia	64%	20%					16%	
Slovakia	92.40%	4.50%	0.30%				2.80%	
Slovenia	95.34%	0.36%		3.76%		0.18%	0.36%	
Spain	24%	8%	*	²¹ 68% *	*			
Sweden		43%	32.5%				24.5%	
Switzerland	54.10%	0.10%	0.10%	33.10%			12.50%	

¹⁹ Full range of services offered by postman of the USP

²⁰ Basic services offered by postman of the USP

²¹ 68% together: for mobile post office, mailman 1 and mailman 2

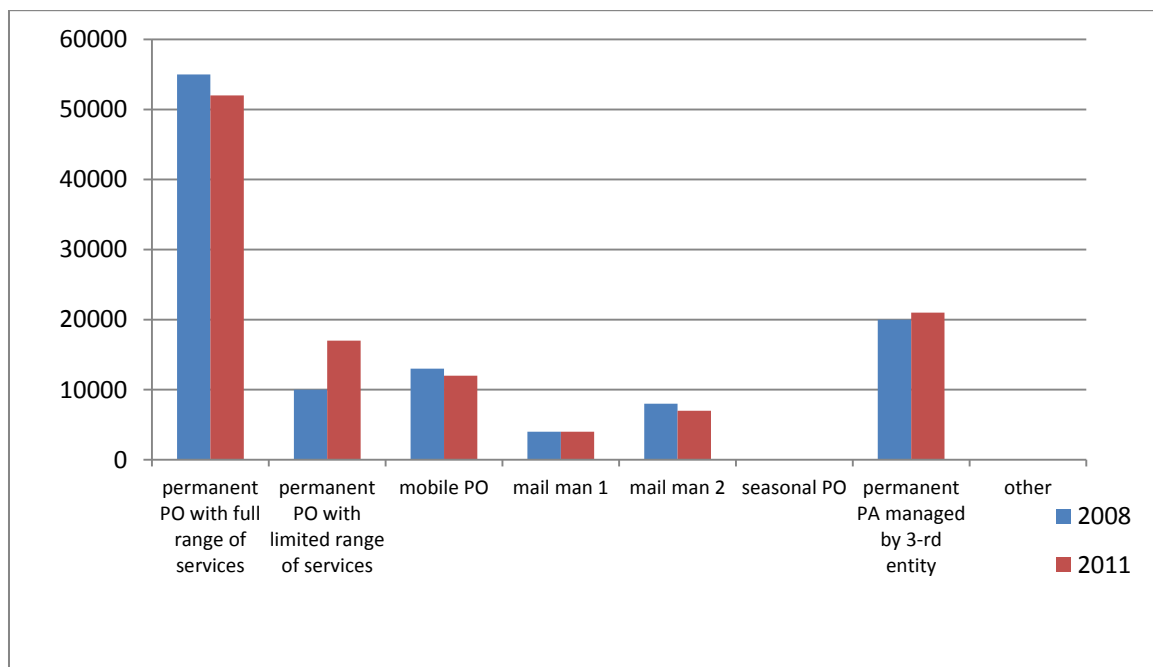
²² Almost 100%



Furthermore information has been collected on the evolution in the number of points of contact of the Universal Service Provider since 2008 (end of 2008 /end of 2011). Two countries – France and Malta – remain with an unchanged number of points of contact. In Bulgaria, Estonia and Sweden changes are also insignificant. For the rest, in 15 countries there is a reduction in the number of points of contacts which vary from 0.7% to 15%, while 6 countries register increase from 0.3% (Hungary) to 60% (Germany²²).

The figure below presents a vision of the change in the number by type of points of contact.²³

Figure 18 - Change in the number by type of points of contact from 2008 till 2011



According to data obtained from questionnaires the overall trend for the 4-year period 2008-2011 is a growth of nearly 4%. There is a decrease in the number of permanent post offices offering a full range of services, mobile post offices and seasonal post offices, as well as in the number of mailman 2 offering basic postal services. The number of permanent post offices with a limited range of services, mailman 1 which offers a full range of services and permanent post agencies managed by a 3rd entity shows growth, the greatest increase being in the number of permanent post offices with limited range of services – 65%.

²² The huge increase in Germany of 60% is due to the fact that from 1st January 2008 onwards the Universal Service obligation is to be fulfilled by the market forces and not by one legally designated USP. Against this background it is mainly the number of postal establishments by other market players that had to be included and lead to this subsequent increase

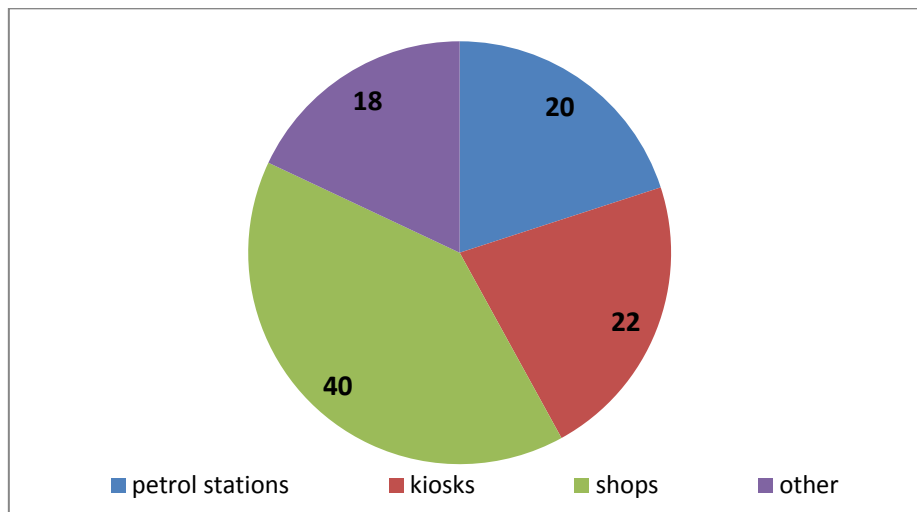
²³ Serbia is not included in the figure, because of data provided only for 2011. This does not affect the general trend.



The decrease in the number of permanent post offices with a full range of services reflects the growing trend to run post offices with limited range of services.

Information has also been collected regarding the range of services offered by post agencies managed by third entities. It appears that different countries have different approaches. The NRAs of Denmark, Germany, Greece, Poland, Netherlands declared that post agencies in their countries perform both full and limited ranges of services depending on the type of the agency. In French postal agencies the main postal activities are carried out. In Belgium some financial postal transactions and some public services are excluded; in Portugal some agencies do not provide acceptance of parcels. Some NRAs stated that postal agencies, managed by 3rd entities offer all the services included in the universal postal service.

Figure 19 - Location of post agencies managed by third parties



Post agencies managed by third entities are mainly located in shops (food retailing), followed by kiosks and petrol stations, while the lowest share goes to other²⁴ places. This is understandable because of all the places listed above, shops are the most visited.

²⁴ Commercial banks; municipal or other offices; town councils; bookstores; premises of local business entities; bars; railway stations



4.4 Measurement of consumer satisfaction

17 NRAs have answered that they use or monitor indicators of consumer satisfaction in their country, 14 NRAs do not.

Table 32 – NRA uses/monitors measurement of consumer satisfaction

Question	Answer	Count	Country	%
Do you use/monitor indicators of consumer satisfaction in your country?	Yes	17	BE, CH, EL*, ES, HU, IE, LT, FYROM, MT, NO, PT, RO, RS, SE, SI, SK, UK	53%
	No	15	AT, BG, CY, CZ, DE, DK, EE, FI, FR, HR, IT, LV, LU, NL, PL	47%

* survey only on a non regular basis

More than half of all NRAs do use, do monitor or do supervise indicators concerning consumer satisfaction. Indicators of consumer satisfaction are often made by the USP or/an independent body.

Table 33 - Country case Slovakia

Slovakia: The universal service provider shall submit to the Postal Regulatory Authority the methodology of measurement the customers' satisfaction and shall ensure the measurement of the customers' satisfaction with the universal service quality on the representative sample of min. 1 000 customers at least once a year. The universal service provider shall analyse the reasons of dissatisfaction and lay down the measures to eliminate the causes. The universal service provider shall inform the Postal Regulatory Authority about the measurement results and done measures.

Table 34 - Additional selection of information of different countries

Ireland: http://www.askcomreg.ie/post/market_research.99.LE.asp
Malta: <http://www.mca.org.mt/article/consumer-perception-survey-households-postal-services>
Portugal: <http://www.anacom.pt/render.jsp?contentId=1090908&languageId=1>

Conclusion:

- Customer satisfaction was chosen as a core indicator for monitoring the development of the postal sector last year²⁵. Compared to that in more than half of all participating countries (NRAs in 17 countries) NRAs can use/monitor indicators of consumer satisfaction.
- Often the USP measures consumer satisfaction under the supervision of the NRA.
- Also often an independent body is used to measure consumer satisfaction, for both the USP and the NRA.
- Surveys of consumer satisfaction are collected most often annually or every two years. Mostly there is a legal justification to carry out an annual survey.
- The measurements represent national markets.
- Surveys of consumer satisfaction are also often made especially about a part of the universal service: for example concerning residential population, households postal services, large bulk mailers or micro business perception.

²⁵ See: http://ec.europa.eu/internal_market/ergp/docs/documentation/ergp-11-20_en.pdf page 43



4.5. Surveys regarding customers' needs

14 of the 32 replying NRAs have answered that they do conduct market surveys.

Table 35 - Surveys regarding customer needs

Question	Answer	Count	Country	%
Do you conduct market surveys?	Yes	14	BE, CH, CY, EL, FI, FR, HU, IE, LT, MT, PT, RS, SI, UK	44%
	No	17	AT, BG, CZ, DK, DE, EE, ES, HR, IT, LV, LU, PL, FYROM, RO, SE, SK	53%
	only once (2010)	1	NO	3%

More information for private consumer are available under following links

Table 36 - Selection of information concerning surveys private consumer

Belgium: http://www.bipt.be/ShowDoc.aspx?objectID=3241&lang=NL Malta: http://www.mca.org.mt/article/consumer-perception-survey-households-postal-services Portugal: http://www.anacom.pt/render.jsp?contentId=1090908&languageId=1 UK: http://stakeholders.ofcom.org.uk/binaries/post/92.pdf
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Some examples of survey purposes (examples are from Malta):

- Assessing the extent of household consumer satisfaction with the services provided by the USP;
- Monitoring a number of postal service aspects, namely price levels, quality, access and complaints handling;
- Providing the NRA with an indication on how consumer needs are changing over time and what market trends are developing;
- Serving as an additional source of information for regulatory decisions

More information for business consumer are available under following links

Table 37 - Selection of information concerning surveys business consumer

Malta: http://www.mca.org.mt/article/large-bulk-mailers-perception-survey-postal-services Ireland: http://www.askcomreg.ie/post/market_research.99.LE.asp
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Some examples of survey topics:

- Usage and awareness of postal service providers
- Volumes of mail sent
- Attitudes to the postal service
- Complaints experience
- Awareness of market liberalization
- E-communication and postal services



ERGP (12) 30 – report on QoS and end-user satisfaction

Some trends concerning surveys (consumer satisfaction and consumer needs):

- Market surveys are often carried out annually or in function of needs
- The surveys are often conducted by an independent body
- Different methods are used: Telephone interviews / computer-assisted telephone interviews (CATIs), standardized questionnaires, face to face interviews

Consumer satisfaction surveys or surveys on the degree of satisfaction of user needs are in use. Surveys cover consumer satisfaction and needs.



ERGP (12) 30 – report on QoS and end-user satisfaction

5. Conclusions on the current practices of the NRAs on the quality of service regulation

A particular task of national regulatory authorities (NRAs) is to ensure compliance with the obligation arising from the Directive, in particular through the follow-up of quality of service issues. Quality of service standards are set and published in relation to the universal service in order to guarantee a postal service of good quality. Quality standards shall focus, in particular, on routing times and on the regularity and reliability of services. NRAs shall ensure that independent performance monitoring is carried out, that the results are justified, and that corrective action is taken where necessary.

In this report ERGP has collected the core indicators and instruments to monitor the quality of service regarding end-user satisfaction and consumer protection linked back to regulatory measures taken in that field.

ERGP has already collected data regarding these core indicators, especially regarding measurement of domestic transit time of end-to-end services for single piece priority mail, collection & delivery and access points (letter boxes and postal establishments), end-user satisfaction and consumer surveys.