



ERGP (11) 19

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

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Terms and abbreviations

CEN – Comité Européen de Normalisation / European Committee for Standardisation

NRA – National regulatory authority

US – Universal service

USP – Universal service provider

USO – Universal service obligation

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	HR – Croatia
HU – Hungary	IE – Ireland	IS – Iceland
LT – Lithuania	LU – Luxembourg	LV – Latvia
MT – Malta	NL – Netherlands	NO – Norway
PL – Poland	PT – Portugal	RO – Romania
SE – Sweden	SK – Slovakia	SI – Slovenia
UK – United Kingdom		

0. Executive summary

- Background

Chapters 6 and 9 of the Postal Directive 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, the end-user satisfaction and consumer protection within the context of the regulatory measures taken in that field.

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

The issue of the quality of service and end-user satisfaction has been analyzed in the following 6 dimensions:

- 1° Measurement of the quality of service concerning transit time and loss
- 2° Measurement of complaints
- 3° Consumer issues
- 4° Obligations imposed on postal service providers
- 5° Collection & delivery
- 6° Access point

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"). In 2010 targets were set in 28 countries for measuring the transit time of end-to-end priority mail for the USP. 18 countries - achieved their targets - while 9 countries did not. Even if the heterogeneity of targets and results were high across countries and that measurements were revised to different national standards or peculiarities, the conclusion is that the values of the targets and the

values of the results are close to 90%. Furthermore we have analysed in detail the implementation of the other measurement standards for transit time of non-priority mail, bulk mail and parcels. The implementation of the standards for measurement of loss was assessed as well. Finally we have assessed the corrective measures in case of non-compliance with the quality of service targets.

2° Measurement of complaints

The vast majority of NRAs' (86%) are responsible for dealing with complaints from users. Furthermore, this responsibility applies in most cases if complaints could not be resolved first between the customer and the provider on a bilateral basis. In most countries, an independent authority other than the NRA is responsible for complaint handling; most of them have an ombudsman, others possess complaint boards and associations for consumer rights for instance. Nearly all NRA's collect data by the designated USP about universal services in general, more than three quarter even collect them by category. The vast majority of NRA's can provide figures on complaints for 2009/2010 related to complaints received on their own account or related to complaints received by the USP. In nearly half of the countries, the designated USPs have implemented the standard (EN 14012 – Complaints handling principles).

3° Consumer issues

According to the responses almost 30 % of the NRA's are responsible for all consumer issues, almost 60 % for some and only 10 % of the NRA's have stated that they are not responsible at all for consumer issues. Two third of the countries have a measurement system of consumer satisfaction in place in their country and also check the information published/released by postal service providers to users on the particular features and conditions of the service. 80 % of the NRA's co-operate with other relevant parties as consumer bodies. Furthermore we have focused on the protection of consumers' rights and the compensations schemes implemented for individual customers.

4° Obligations imposed on postal service providers

NRA's were particularly consulted about the requirements imposed on postal services providers concerning the compliance with the essential requirements and the quality, availability and performance of the services. Moreover, responses underline quite clearly that confidentiality is the most common essential requirement followed by data protection and security. Finally, responses point out that the overall majority of NRAs' are responsible for verifying the compliance with the obligations concerning the quality, availability and performance of the services.

5° Collection & delivery

The universal service guarantees one clearance and delivery every working day, in urban and rural areas. The frequency of collection for correspondence is in almost 60% of the countries 1 collection per day and 5 collections per week. In 13 % of the countries the collections per week is extended for 1 day. 27 % of the countries have another type of collections, for example 1-2 collections per day and/or more than 6 collections per week. The requirements of frequency of delivery for correspondence delivered under the universal service is once per day and 5 times per week is met by 66% of the

countries (20) , while in 17 % of the countries the weekly delivery is extended for 1 day. In 17 % of the countries the delivery occurs in a different way as those countries don't have or partly have requirements. Half of the countries have specific rules concerning private letter boxes and also half of the countries accept delivery to alternative installations in case of impossibility of home delivery.

6° Access point

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 postal establishments. Furthermore, in 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 postal establishments at European level. The most common type is the permanent post office managed by the USP with full range of services, then the permanent post agencies managed by 3rd party, followed by permanent post offices with limited range of services, mail man offering basic postal services and mobile post offices. As a whole the reduction in the number of postal establishments is only 1%, the most significant drop being in the number of permanent post offices with full range of services – 7.7%, while the greatest increase appears to be in the number of permanent post agencies, managed by 3-rd entity – 10.5%. It cannot be concluded that this implies an overall trend – obviously each country quantifies the type of postal establishments according to different circumstances.

- **Final conclusions**

In this report we have 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.

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, complaints, collection & delivery and access points (letter boxes and postal establishments).

Other indicators could also be used to monitor quality of service, end-user satisfaction and consumer protection.

Next year we will analyse these data and try to detect trends in the market regarding quality of service and we will try to update the most important core indicators. Furthermore, we can try to detect some best practices regarding monitoring of the quality of service. ERGP will make a report on complaint handling and consumer protection including the measures in place at national level to ensure consumer protection and suggest best practices in this field to guarantee that transparent, simple and inexpensive procedures are available to users, particularly in cases involving loss, theft, damage or non-compliance with service quality standards.

1. Background

Chapters 6 and 9 of the Postal Directive (Directive 97/67/EC, as amended by Directive 2008/6/EC), set out that the national regulatory authorities (NRA's) shall ensure compliance with the obligations arising from the Directive, in particular through the quality of service follow-up.

The Directive emphasises that the postal reform brought 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 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.

The European Commission established, by decision of 10 August 2010¹, 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 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.

¹ OJ C 217, 11.8.2010, p. 7.

2. Objectives

The report examines two key issues, namely:

- a) quality of service and its development over time;
- b) complaint handling procedures and consumer protection.

The goal is to collect the necessary data to monitor quality of service, end-user satisfaction and consumer protection 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 especially regarding complaint handling;
- 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 these 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 NRA's 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 second questionnaire to obtain information on the practice of NRA's and views on core indicators for market monitoring. For drafting this report we have used the data from both questionnaires.

NRA's from the following 30 countries provided feedback: AT, BE, BG, CH, CZ, CY, DE, DK, EE, EL, ES, FI, FR, FYROM, HR, HU, IE, LT, LU, LV, MT, NL, NO, PL, PT, RO, SE, SI, UK and SK.

In this regard, it should be noticed that the Spanish NRA started its work in 2011. In 2011 there were changes in the legal framework of some Members of ERGP and from 30 September 2011 regulation of postal services in the United Kingdom was transferred from the Postal Services Commission (Postcomm), to the Office of Communications (Ofcom) as a result of changes in the legal framework applicable to the postal sector.

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

The analysis here into is primarily based on the answers provided to the questionnaires (June 2011), which in general, reflect the legislation and practice in place at 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 analyzed in the following 6 dimensions:

- 1° Measurement of the quality of service concerning transit time and loss
- 2° Measurement of complaints
- 3° Consumer issues
- 4° Obligations imposed on postal service providers
- 5° Collection & delivery
- 6° Access point

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 as foreseen in article 20 of the Directive.

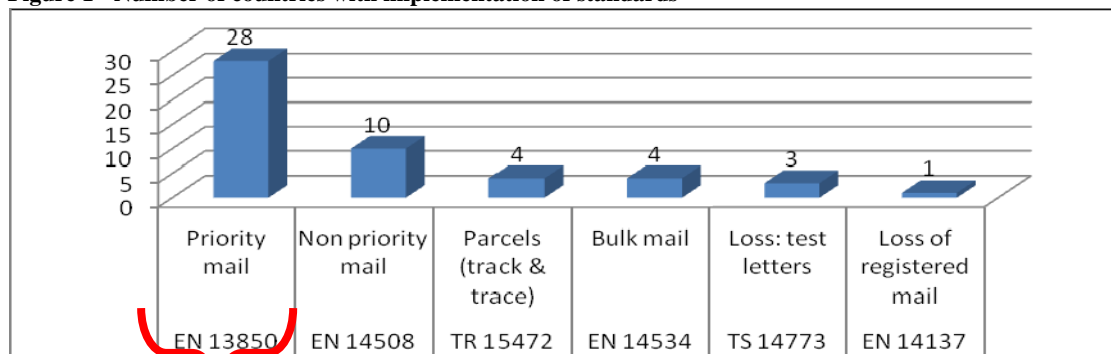
4.1. Measurement of the quality of service concerning transit time and loss

You will find below a list of certain quality of service (QoS) standards regarding measurement of transit time and loss developed by the CEN:

- EN 13850: Measurement of the transit time of end-to-end services for single piece priority mail and first class mail;
- EN 14508: Measurement of the transit time of end-to-end services for single piece non-priority mail and second class mail;
- EN 14534: Measurement of the transit time of end-to-end services for bulk mail;
- TS 14773: Measurement of loss and substantial delay in priority and first class single piece mail using a survey of test letters;
- TR 15472: Measurement of transit times for parcels by the use of track & trace system;
- EN 14137: Measurement of the loss of registered mail and other types of postal service using a track and trace systems.

There are different standards to measure the quality of service concerning the transit time and loss. As you can see in the table below the application of the standards varies widely across Europe. The most commonly used standard is EN 13850.

Figure 1 - Number of countries with implementation of standards



Most commonly used standard

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 one which is mandatory in nearly all countries. 28 NRAs' reported that this standard is implemented in their countries.

Table 1 - Targets and results for 2009 and 2010 per country

	EN 13850 D + 1	Targets 2009	Results 2009	Targets 2010 If available	Results 2010 If available
		D+1 = ... %	D+1 = ... %	D+1 = ... %	D+1 = ... %
AT	Austria	95.00%	confidential	95.00%	95.39%
BE	Belgium	90.00%	93.20%	90.00%	93.30%
BG	Bulgaria	80.00%	84.20%	80.00%	83.60%
HR	Croatia	85.00%	62.80%	85.00%	78.00%
CY	Cyprus	90.00%	86.40%	90.00%	89.60%
CZ	Czech Rep.	91.00%	92.09%	92.50%	93.19%
DK	Denmark	93.00%	95.70%	93.00%	93.30%
EE	Estonia	90.00%	93.80%	90.00%	92.70%
FI	Finland	85.00%	93.50%	85.00%	91.10%
FR	France	84.00%	84.70%	84.00%	83.40%
DE	Germany	80.00%	fulfilled	80.00%	fulfilled
GR	Greece	87.00%	81.50%	87.00%	87.70%
HU	Hungary	85.00%	93.05%	85.00%	93.68%
IE	Ireland	94.00%	84.00%	94.00%	85.00%
LV	Latvia	97.00%	96.30%	97.00%	97.30%
LT	Lithuania	85.00%	77.10%	85.00%	64.95%
LU	Luxembourg	95.00%	97.93%	95.00%	97.99%
MT	Malta	93.00%	95.10%	93.00%	95.10%
NL	Netherlands	95.00%	95.20%	95.00%	n.a.
NO	Norway	85.00%	88.30%	85.00%	83.50%
PL	Poland	82.00%	52.70%	82.00%	53.40%
PT	Portugal	94.50%	95.20%	94.50%	94.70%
FYROM	Republic of Macedonia	85.00%			
RO	Romania	85.00%	46.20%	85.00%	52.60%
SK	Slovakia	96.00%	96.01%	96.00%	96.82%
SI	Slovenia	95.00%	93.90%	95.00%	95.50%
ES	Spain				
SE	Sweden	85.00%	95.70%	85.00%	93.70%
CH	Switzerland	97.00%	97.70%	97.00%	97.20%
UK	United Kingdom	93.00%	87.90%	93.00%	91.40%

PT: For letters sent between any location of Portugal mainland

ES: no category of priority mail but data for D+3 and D+5, namely:

(D+3): Target (2009): 93%, Result (2009): 92.5%, Target (2010): 93%, Result (2010): 91.18%

(D+5): Target (2009): 99%, Result (2009): 98.3%, Target (2010): 99%, Result (2010): 98.2%

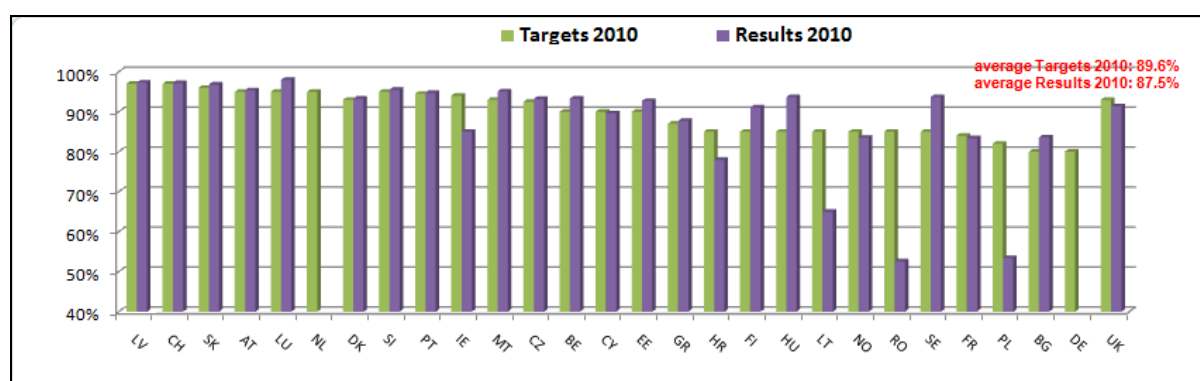
4.1.1.1. Targets for priority single piece mail for 2010 - EN 13850

In 2010 targets were set in 28 countries for measuring the transit time of end-to-end priority mail for the USP. However, there is a high heterogeneity of targets: The previous table shows it by the relatively low targets in Bulgaria and Germany (80%) compared to the high targets in Latvia and Switzerland (97%).

4.1.1.2. Performance 2010

The results for 2010 were in 17 countries higher than in 2009. 18 countries exceeded the average results in 2010 (average results 2010: 87.5%). The results of measurement in 2010 were good and slightly better in comparison with 2009. The highest improvements were measured in Croatia (from 62.8% in 2009 to 78% in 2010), Romania (from 46.2% to 52.6%) and Greece (from 81.5% to 87.7%). A decrease in results was observed in 10 countries, the most extreme decrease was in Lithuania: from 77.1% in 2009 to 64.95% in 2010. 18 countries achieved their targets while 9 countries did not².

Figure 2 – Targets and Results 2010 for EN 13850



If a USP failed to achieve a target, it had to face consequences in 24 countries: The majority of NRA's mentioned financial sanctions for the USP.

The majority of all countries of ERGP took into account their national peculiarities and reviewed standard EN 13850. Our conclusion is that, as allowed by EN 13850, the majority of countries adapted standard EN 13850 to take into account national peculiarities. This fact shows that one should be careful when comparing EN 13850 measurement results between countries³.

EN 13850 is going to be adapted and renewed soon (see: CEN European Committee for Standardization, prEN 13850).

Even if the heterogeneity of targets and results were high across countries and measurements were reviewed according to different national standards or peculiarities, the conclusion is that the values of the targets and the values of the results approximate 90% (see Figure 2).

² Information concerning results 2010: DE: fulfilled, NL: n/a, ES: no category of priority mail, UK: different targets

³ See: EN 13850, page 4: Scope "This quality of service indicator does not measure the postal operator's overall performance in a way that provides direct comparison of postal service operators, and does not include other service performance indicators than those related to transit time."

4.1.1.3. Force majeure events

In the 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 2010, the range of force majeure days was from 0 to 20 days. The following reasons were principally mentioned: weather conditions (12 countries), natural disasters (6 countries) and national strikes (4 countries). As examples for force majeure we would like to mention the handling in Ireland and Portugal:

Table 2 - Country cases Ireland and Portugal

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.

Portugal: Should any “force majeure” events or other phenomenon situations take place, 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 concerned periods of time and geographic flows. “Force majeure” events or phenomenon situations 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.)

4.1.1.4. Frequency of report to NRA concerning EN 13850

Furthermore we inquired about the frequency of report to NRAs concerning EN 13850. All NRA’s received results annually or more often. 10 NRA’s also received results half yearly or quarterly, 4 NRAs’ also received monthly.

The information of 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 next to USP which was willing to adapt the EN 13850 measurement.

4.1.1.5. Current status of EN13850 by country

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

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

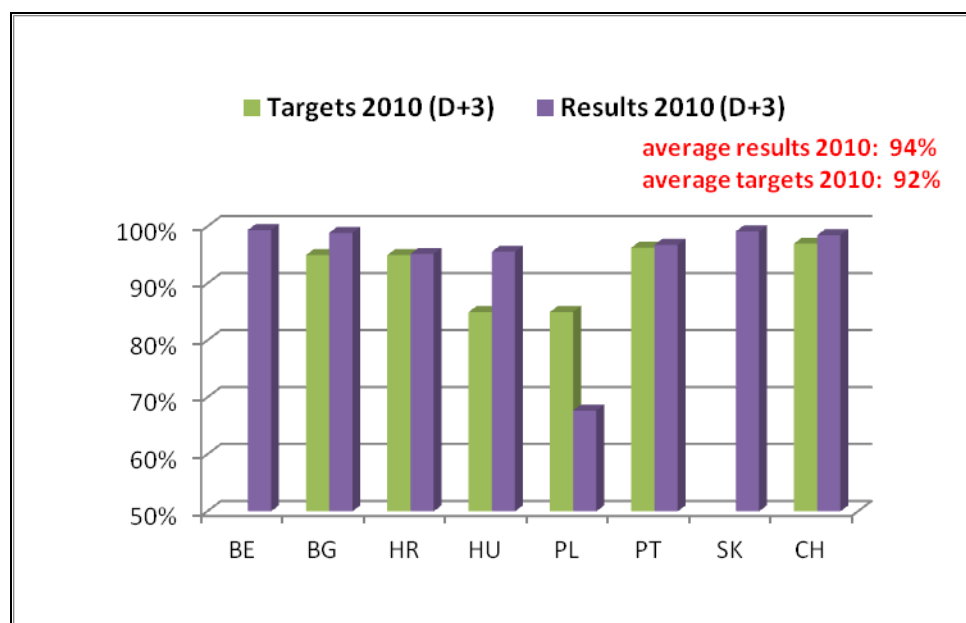
Table 3 - Summarising the current state of EN 13850 by country

Question	Answer	Count	Country	%
EN13850 implemented?	Yes	28	AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, GR, HR, HU, IE, LT, LV, MT, NL, NO, PL, PT, RO, SE, SI, SK, UK	93%
	No	2	FYROM, LU	7%
Targets achieved in 2010?	Yes	18	BE, BG, CH, CZ, DE, DK, EE, FI, GR, HU, LU, LV, MT, PT, SE, SI, SK	69%
	No	8	CY, FR, HR, IE, LT, NO, PL, RO	31%
Any consequences foreseen in the legislation if target is not achieved?	Yes	24	AT, BE, BG, CY, CZ, DE, EE, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LU, MT, NO, PT, RO, SI, SK, UK	80%
	No	6	CH, DK, LV, NL, PL, SE	20%
National peculiarities?	Yes	18	BG, CH, CY, DK, FI, FR, DE, FYROM, GR, HR, IE, LU, MT, NL, PT, RO, SI, SK	59%
	No	12	AT, BE, CZ, EE, ES, HU, LV, LT, NO, PL, SE, UK	41%

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 in 10 countries. However, this service does not exist in all countries. Targets for D+3 were most common in 2010 and they varied between 85% and 97% (average 92%). 8 NRA's gave data for D+3. In general, the results for D+3 were good in 2010, with an average of 94%.

Figure 3 – Targets and Results 2010 for EN 14508 (D+3)



4.1.3. Measurement of domestic transit time of end-to-end service for bulk mail - EN 14534

Standard EN 14534 (measurement of domestic transit time of end-to-end service for bulk mail) is fully or partly implemented in 4 countries (BE, FR, HU, MT).

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

Technical report TR 15472 (measurement of domestic transit time for parcels with track and trace system) is fully or partly implemented in 4 countries (BE, FR, MT, SI). Different countries mentioned also another measurement.

4.1.5. Measurement of loss of registered mail and other types of postal service using the track and trace system - EN 14137

Standard EN 14137 (measurement of loss of registered mail and other types of postal service using track and trace system) is only implemented in Denmark. France and Malta are considering implementing it. France mentioned another measurement.

4.1.6. 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 3 countries (CZ, DK, PT). In the Czech Republic this measurement is fully compliant with the technical specification, in Denmark and Portugal partly compliant with the technical specification.

The publication of number of lost mail by USP is also different in many countries. The majority of USPs does not have to publish any information of lost mail. In 6 countries (DK, EE, FR, PT, FYROM, CH) the USP has to publish annually information about lost mail.

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

Table 4 - Country case Hungary and Portugal

Hungary:

1. In respect of 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.

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 by the special services such as: Registered, Insured, Not-insured and Acknowledgement.

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‰.

4.1.7. Other relevant indicators related to measurement of transit time

NRA's 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.

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

Concerning the possibility of corrective measurement in case of non-compliance with the quality of service targets, 21 countries mentioned to use or to foreseen some corrective measures.

Table 5 - Corrective measures in case of non-compliance with QoS target

Answer	Count	Country	%
Yes	21	BE, BG, CY, DE, DK, EE, ES, FR, FYROM, GR, HR, HU, IE, LT, MT, NO, PT, RO, SI, SK, UK	72%
No	8	AT, CH, CZ, FI, LU, LV, PL, SE	28%

As corrective measures concerning non compliance the NRA's mentioned:

- financial sanctions
- new designation/tender
- rectification/ Improvement actions
- recommendations
- progressively improvement scheme
- collective compensation scheme
- impact on the pricing scheme

However, the most often used and mentioned corrective measurement was a financial sanction (fine).

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

As the possibility of a fine imposed on a postal services provider could have a huge impact on its financial situation, we also asked the NRAs' how they felt about considering alternative solutions to improve the quality of service.

Table 6 – Alternative solutions for improving the QoS

Answer	Count	Country	%
Yes	12	BE, CY, EE, FR, HU, IE, NO, PT, SE, SI, SK, UK	48%
No	13	BG, CZ, DE, DK, ES, FI, FYROM, HR, LT, LU, MT, NL, RO	52%

Other instruments mentioned were publications, warnings and recommendations.

4.1.9. Conclusions

Based on our fact-finding we 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 best use of EN 13850 is not to compare measurements across countries but to control if the USP achieves its target or not.
- The most often used and mentioned by NRA's corrective measurement is a financial sanction.
- Concerning corrective measures to deal with non compliance on QoS target, NRA's also mentioned, next to financial sanction, publications, warnings and recommendations.

4.2 Measurement of complaints

4.2.1 Responsibility of NRA for users' complaint

The vast majority of NRA's (86%) are responsible for dealing with complaints from users. This responsibility applies in most cases if complaints could not be resolved first between the provider and the regulator on a bilateral basis. Only IE, PL, RO and UK have no responsibilities for complaint handling.

Table 7 - Responsibility of NRA for users' complaints

Question	Answer	Count	Country	%
Responsibility for complaints?	Yes	25	AT, BE (is only partly dealing with complaints as they have an ombudsman for operational complaints), BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, HU, LU, LV, LT, MT, NO, PT, SE, SI, SK,	86%
	No	4	IE, PL, RO, UK	14%

In most countries (86%), an independent authority other than the NRA is responsible for complaint handling; most of them have an ombudsman, others possess complaint boards and associations for consumer rights for instance. In conclusion, only in DK, EE, HU and NO, the NRA is in charge of complaint handling on his own.

Table 8 - Other authority (other than NRA) responsible for complaint handling

Question	Answer	Count	Country	%
Other authorities responsible for complaints	Yes	25	AT, BE, BG, CH, CY, CZ, DE, FI, FR, FYROM, GR, HR, IE, LV, LT, LU, MT, PL, PT, RO, SK, SI, ES, SE, UK	86%
	No	4	DK, EE, HU, NO	14%

4.2.2. Collection of data on complaints

Most of the NRAs' (86%) collect data produced by the designated USP about universal services in general, 76% even collect them by category. Only BE⁴, EE, DE and LU do not collect any data while EE, LU, SK and FI obtain no data distinguished by category/ and or service.

Table 9 – NRA collect data of received complaints by the designated USP about universal services

Type	Answer	Count	Country	%
Figure by category and/or service	Yes	19	AT, BG, CY, CZ, DK, ES, FR, FYROM, GR, HR, HU, LT, LV, MT, NO, PL, PT, RO, SE, SI	76%
	No	6	BE, DE, EE, FI, LU, SK,	24%
Figure by total	Yes	25	AT, BG, CH, CY, CZ, DK, FI, FR, FYROM, GR, HR, HU, IE, LT, LV, MT, NO, PL, PT, RO, SE, SI, SK, UK	86%
	No	4	BE, DE, EE, LU	14%

⁴ BE NRA is only partly dealing with complaints as they have an ombudsman for operational complaints of the postal operators

A minority of NRA's receive data from the designated USP about non-universal services, namely 38% collect data for the total number of complaints and 20 % by category (AT, BG, CY, LV, PL, FYROM).

Table 10 - NRA collect data of received complaints by the designated USP about non-universal services

Type	Answer	Count	Country	%
Figure by category and/or service	Yes	6	AT, BG, CY, FYROM, LV, PL,	20%
	No	23	BE, CH, DE, DK, EE, ES, FR, HR, HU, LT, LU, RO, SI, SK, CZ, FI, GR, IE, MT, NO, PT, SE, UK	80%
Figure by total	Yes	11	AT, BG, CY, ES, FYROM, LT, LV, PL, RO, SK, UK	38%
	No	18	BE, CH, CZ, DE, DK, EE, FI, FR, GR, HR, HU, IE, LU, MT, NO, PT, SE, SI	62%

Again, the minority of NRA's (only 31% in total and 21% by category) collect data from postal service providers concerning universal services. Among those that collect data, AT, BG, HU, LV, SI and PL collect it in general and by category and /or service.

Table 11 - NRA collect data of received complaints by other postal service providers, active in the universal area about universal services

Type	Answer	Count	Country	%
Figure by category and/or service	Yes	6	AT, BG, HU, LV, PL, SI	20%
	No	23	BE, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, IE, LT, LU, MT, NO, PT, RO, SE, SK, UK	80%
Figure by total	Yes	9	AT, BG, ES, FYROM, HU, LV, PL, SI, SK,	31%
	No	20	BE, CH, CY, CZ, DK, EE, FI, FR, DE, GR, HR, IE, LT, LU, MT, NO, PT, RO, SE, UK	69%

The same picture applies for the non-universal service where again only 31% of the NRA's collect data.

Table 12 - NRA collect data of received complaints by other postal service providers, active in the universal area about non-universal service

Type	Answer	Count	Country	%
Figure by category and/or service	Yes	3	AT, BG, PL	11%
	No	25	BE, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LU, MT, NO, PT, RO, SE, SI, SK, UK	89%
Figure by total	Yes	9	AT, BG, ES, FYROM, LT, PL, SI, SK, UK	31%
	No	19	BE, CH, CY, CZ, DE, DK, EE, FR, FI, GR, HR, HU, IE, LU, MT, NO, PT, RO, SE	68%

A small percentage of 31% collect received data from other postal providers about non universal service. Only AT, BG, PL and SI collect data specified by category.

Table 13 - NRA collect data of received complaints by other postal service providers about non-universal services

Type	Answer	Count	Country	%
Figure by category and/or service	Yes	4	AT, BG, PL, SI	14%
	No	25	BE, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LU, LV, NO, PT, RO, SE, SK, UK	86%
Figure by total	Yes	9	AT, BG, CY, ES, GR, LT, PL, SI, UK	31%
	No	20	BE, CH, CZ, DE, DK, EE, FI, FR, FYROM, HU, IE, LU, LV, MT, NO, PT, RO, SE, SK	69%

4.2.3. Results for 2009/ 2010 regarding complaints and publication

The vast majority of NRA's can provide figures on complaints for 2009/2010 related to complaints received on their own or related to complaints received by the USP. Only data of LU and ES are unavailable while AT has been responsible for complaints since this year. To allow for better comparison of the results, it would be necessary to ask NRA's again for concrete figures and categorise them.

Table 14 - Results for 2009/ 2010 regarding complaints

Question	Answer	Count	Country	%
Results for 2009/2010 on complaints	Yes	26	BE, BG, CH, CY, CZ, DE, DK, EE, FI, FR, FYROM, GR, HR, HU, IE, LT, LV, MT, NO, PL, PT, RO, SE, SI, SK, UK	90%
	No	3	AT (only responsible for complaints since 1.1.2011), ES, LU	10%

The answers show that a small majority of NRA's publishes figures, 6 countries that reported non-publication, publish figures throughout other channels.

Table 15 - Publication of figures regarding complaints by NRA

Question	Answer	Count	Country	%
Publication of figures on complaints	Yes	16	BG, CY, CZ, EE, DE, FYROM, GR, HR, LT, LV, PL, PT, RO, SE, SI, SK AT, BE, CH, DK, ES, FI, FR, HU, IE, LU, MT, NO, UK	55%
	No	13	Out of these 13 NRAs, 6 NRAs (CH, ES, FI, FR, MT and UK) have other ways to publish figures, e.g. obligation for the USP to publish.	45%

4.2.4 Standard EN 14012 – Complaint handling principles

In nearly half of the countries, operators (13 out of the 29 in total) have implemented the standard for the designated USP so far. For other postal service providers active in the universal service area, no NRA implemented the standard until now and the standard is not implemented by other postal service providers themselves.

Table 16 - Implementation of standard EN 14012

Question	Answer	Count	Country	%
Implemented for the designated USP	Yes	13	BE, FR, GR, HR, HU, IE, LT, MT, NO, PT, RO, SE, SI, SK	45%
	No	14	AT, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FYROM, LV, PL, RO	48%
	N/A	2	LU, UK	7%
Implemented for other postal service providers active in the universal service area	Yes	0		0%
	No	23	AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FR, FYROM, GR, HR, HU, IE, LT, MT, NO, PL, SE, SI, SK LV, LU, RO, UK	80%
	NA	6	2 NRA's don't know whether the standard is implemented or not (FI, PT)	20%
Implemented by other postal service providers	Yes	0		0%
	No	21	AT, BE, BG, CH, CY, DE, DK, EE, ES, FR, FYROM, GR, HR, HU, LT, MT, NO, PL, SE, SI, SK CZ, IE, LU, LV, RO, UK	72%
	N/A	8	2 NRA's don't know whether is implemented or not (FI, PT)	28%

Only in a minority of countries the measurement implemented by the USP is fully compliant with the CEN standard for the designated USP, some are partly compliant (where minor changes are still needed) and 58% gave no answer to that question. For other postal service providers, only in BG significant changes are still needed whereas in the other countries, other postal service providers do not measure according to the standard.

Table 17 - Measurement according to standard EN 14012

Question	Answer	Count	Country	%
Measurement according to the standard for the designated USP	Fully	4	FR, HR, SE, SI	14%
	Partly	8	changes are needed: BE, BG, GR, HU, LT, PT, SK, IE	28%
	N/A	17	AT, CH, CY, CZ, DE, ES, DK, EE, FI, FYROM, LV, LU, MT, NO, PL, RO, UK minor changes are needed: BG	58%
Measurement according to the standard for other postal service providers active in the universal service area	Partly	1		4%
	No	2	HU, SK	7%
	N/A	26	AT, BE, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, IE, LT, LU, LV, MT, NO, PL, PT, RO, SE, SI, TR, UK BG: significant changes are needed to adapt the current standard	89%
Measurement according to the standard by other postal service providers	Partly	1		4%
	No	1	SK	4%
	N/A	27	AT, BE, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LU, LV, MT, NO, PL, PT, RO, SE, SI, UK	92%

In most countries, there is a legal obligation on the USP to publish information on the number of complaints. For other postal service providers this obligation only applies in rare cases like in DK, FI, HU, SK and ES.

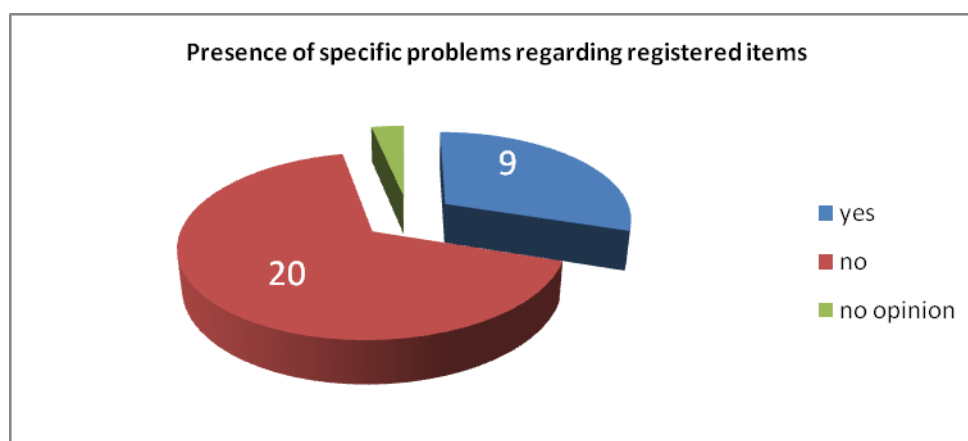
Table 18 - Publication on the number of complaints

Question	Answer	Count	Country	%
USP legally obliged to publish at least annually information on the number of complaints	Yes	19	CH, CZ, DK, EE, ES, FI, GR, HR, HU, IE, LT, LV, MT, NO, PT, RO, SI, SK, UK	66%
	No	10	AT, BE, BG, CY, DE, FR, LU, PL, FYROM, SE	34%
Other postal service providers active in the universal service area are legally obliged to publish at least annually information on the number of complaints	Yes	5	DK, ES, FI, HU, SK	17%
	No	24	AT, BE, BG, CH, CY, CZ, DE, EE, FR, FYROM, GR, HR, IE, LT, LU, LV, MT, NO, PL, PT, RO, SE, SI, UK ES, DK, FI, SK, UK	83%
Other postal service providers legally obliged to publish at least annually information on the number of complaints	Yes	5		17%
	No	24	AT, BE, BG, CH, CY, CZ, DE, EE, FR, FYROM, GR, HR, HU, IE, LT, LU, LV, MT, NO, PL, PT, RO, SE, SI	83%

4.2.5. Registered items

The figure below shows that the majority of NRAs’ (67%) are not aware of having specific problems regarding registered items. 1 NRA has no opinion, while 30% of the NRAs’ consider themselves to have specific problems regarding registered items.

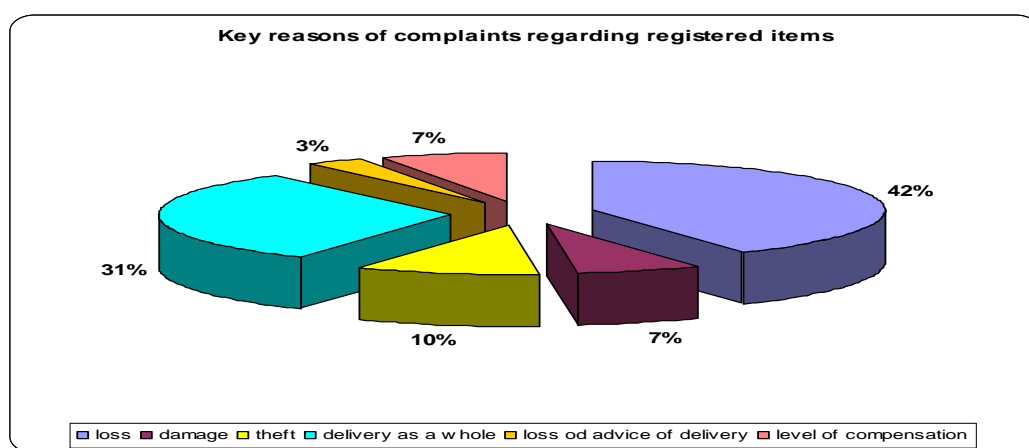
Figure 4 - Specific problems regarding registered items



Delivery emerges as a major problem, especially correct delivery. 1/3 of the respondents indicate a specific problem for registered items, leaving notification without any attempt of delivery or even return of the item to the sender without notifying the addressee about the arrival of item. Other specific problems regarding registered items are: many variations of registered items with specific delivery conditions, there are also complaints about incorrect disposals, for domestic items return to sender within 3 days, lack of possibility to fully trace registered items and failures in delivery.

The NRAs' which collect information on complaints regarding registered items mentioned the following key reasons of these complaints. The responses of the 6 NRA's show (which is reflected in the figure below) that the first important reason of these complaints is loss, followed by the delivery as a whole⁵, theft, damage and level of compensation (with equal rates) and at the end loss of advice of delivery.

Figure 5 – Key reasons of complaints regarding registered items



4.2.6. Conclusions

- The vast majority of NRA's (86%) are responsible for dealing with complaints from users. This responsibility applies in most cases if complaints could not be solved first between the customer and the provider on a bilateral basis. Only IE, PL, RO and UK have no responsibilities for complaint handling.
- In most countries (86%), an independent authority other than the NRA is responsible for complaint handling; most of them have an ombudsman, others possess complaint boards and associations for consumer rights for instance.
- Most of the NRA's (86%) collect data by the designated USP about universal services in general, 76% even collect them by category.
- The vast majority of NRA's can provide figures on complaints for 2009/2010 related to complaints received on their own or related to complaints received by the USP.
- In nearly half of the countries, operators (13 out of the 29 in total) have implemented standard EN 14012 – Complaints handling principles - for the designated USP so far.
- The complaint handling aspect will be analysed in 2012.

⁵ Includes wrong or delayed delivery; no delivery attempt, only notification; difficulties by delivery; misdelivery; transit time

4.3. Consumer issues

4.3.1 Responsibilities of NRA's regarding consumer issues

According to the responses 9 NRA's are responsible for all consumer issues, 19 for some and only 2 NRA's (NO, RO) have stated that they are not responsible at all for consumer issues.

In total 14 NRAs' are in charge of the designated USP, for the other postal service provider active in the US and for other postal service providers. 9 NRA's are only responsible for the designated USP. Finally, 2 NRA's (SI and CH) are responsible for the designated USP and for the other postal service providers active in the universal service area.

Table 19 – NRA's responsible for consumer issues

Question	Answer	Count	Country	%
NRA's responsible for consumer issues	Yes for all	9	AT, CZ, EE, DE, FYROM, LT, LV, MT, SK	30%
	Yes for some	19	BE, BG, CH, CY, DK, ES, FI, FR, GR, HR, HU, IE, LU, NL, PL, PT, SE, SI, UK	63%
	No	2	NO, RO, UK	7%
If yes for which operator	Only designated USP	9	AT, CZ, EE, DE, FYROM, LT, LV, MT, SK	34%
	Only other operators	1	LV	4%
	Designated USP and others in US area	2	CH, SI	8%
	All postal operators	14	AT, BE, DK, EE, FR, FYROM, HR, HU, IE, LT, MT, PL, PT, SK	54%
If no or some, please specify the entity or entities responsible:	Ombudsman	3	BE, GR, NO	30%
	Consumer Authority	4	HU, MT, RO, UK	40%
	Competition Authority	2	HU, MT	20%
	Consumer arbitration Court	1	PL	10%

In particular, two NRA’s (BE and PT) have provided some more detailed information on their role with regard to consumer issues:

Table 20 - Country cases Hungary and Portugal

<p>Belgium: For general consumer complaints regarding the regulatory framework the NRA (BIPT) is responsible, but for operational complaints regarding specific services provided by postal operators the ombudsman for the postal sector is responsible. This ombudsman is fully independent regarding its policy from operator and regulator. The NRA is responsible for the financing of the ombudsman and provides general support services as IT, HR, etc ...</p> <p>Portugal: In recent years, national legislation has entered into force giving the NRA new monitoring competences regarding consumer protection. Still, the NRA does not have powers to arbitrate, mediate or settle disputes between end-users and service providers: If, based on end-users complaints, evidence arises that service providers have failed to comply with the rules in force regarding (postal) communications services, the NRA initiates a procedure which may lead to the application of sanctions to the provider concerned. The NRA does not solve the conflict that led to the complaint, nor imposes any obligations to the provider concerned under the relations with end-users (e.g., the payment of compensations for end-users’ loss). Other competent authorities (such as ADR schemes) may arbitrate, mediate or settle consumer disputes. The Directorate General for Consumer Protection may also perform an important role in providing consumers’ information.</p>

In total 16 out of the 30 responding NRA’s have a specific department at the NRA dealing with consumer issues. 13 NRA’s have no such specific department.

Table 21 - Specific department at NRA dealing with consumer issues

Question	Answer	Count	Country	%
Specific department at NRA dealing with consumer issues	Yes	16	BE, BG, CY, DE, FI, FR, FYROM, GR, HR, HU, LU, MT, PT, SI, SK, UK	53%
	No	13	AT, CH, CZ, DK, EE, ES, IE, LT, LV, NL, NO, RO, SE	43%
	NA	1	PL	4%
If yes, specify	Specific department	8	BE, FI, FR, GR, HR, MT, PT, SK	57%
	Within postal unit	6	CY, DE, FYROM, HU, LU, SI	43%

In total 16 NRA's have indicated that they are monitoring the contractual conditions between the postal service provider and users whereas 13 NRA's responded that they do not.

Table 22 - NRA monitor contractual conditions between postal service provider and users

Question	Answer	Count	Country	%
Does NRA monitor contractual conditions between postal service provider and users	Yes	16	AT, BE, BG, ES, HR, CZ, DE, EE, FI, FR, FYROM, HU, LT, LU, MT, RO,	54%
	No	13	CH, CY, DK, IE, LV, MT, NO, PL, PT, SE, SI, SK, UK	43%
	NA	1	GR	3%
If yes, please specify	General terms and conditions	4	DE, FI, HR, LU	27%
	General and specific terms and conditions	11	BE, BG, CZ, ES, FR, FYROM, HU, LT, MT, RO, SK	73%

Table 23 - Country case Belgium

Belgium: The NRA will monitor in the future contractual conditions on the postal provider and users regarding some specific regulatory obligation as mentioning the possibility to appeal to the ombudsman for the postal sector.

NRA's are informed on consumer issues by different channels, namely complaints, surveys, etc...

Table 24 - Information channels regarding consumer issues

Question	Answer	Count	Country	%
How do you deal with consumer issues	Complaint	22	BE, BG, DE, CY, CZ, DK, EE, ES, FI, FYROM, GR, HR, HU, LT, LV, LU, NL, PT, RO, SK? UK	78%
	Survey	4	BE, HR, LT, SI	15%
	Others	2	FR, PT	7%

Table 25 - Country cases France and Portugal

France: The example of FR falls first of all within the category of "others", as their NRA (ARCEP) has set up a consumer committee with representatives of consumers associations that meets every six months to discuss issues related to consumers' needs and satisfaction in the postal sector and the actions of ARCEP that are related to consumers (tariffs, regulation of quality of service).

Portugal: ANACOM is providing some more detailed information on their dealing with consumer issues as they are promoting an information policy focused on end-users, in order to enable their choices to be more enlightened, to make them aware of their rights as users of communications services and to allow them to prevent disputes with service providers. Their Consumer Issues Area is responsible for handling complaints, providing statistical information to the market and providing general information, mostly through the Consumer Website. Notwithstanding, the information known by ANACOM (through complaints received, through data that the postal service providers are obliged to report, through inspections made by ANACOM, etc.) is also used as a source for supervision and regulatory activities.

4.3.2. Measurement of consumer satisfaction

20 NRA's have answered that a measurement of the consumer satisfaction takes place in their country. 10 NRA's have indicated that there is no such system in place.

Table 26 - Measurement of consumer satisfaction

Question	Answer	Count	Country	%
Any measurement of consumer satisfaction in your country	Yes	20	BE, CH, CY, DE, DK, ES, FI, FYROM, GR, HR, HU, IE, LT, LU, MT, NO, PT, SE, SI, SK	67%
	No	10	AT, BG, CZ, EE, FR, LV, NL, PL, RO, UK	33%
If yes, please specify	By NRA	10	BE, CY, HR, HU, LT, MT, PT, SE, SI, SK	56%
	By Ministry	1	FI	6%
	By USP	3	DK, NO, SK	17%
	External	4	CH, DE, ES	21%

Slovakia is presented below as country case for the measurement of customers satisfaction.

Table 27- Country case Slovakia

Slovakia: According to Article 12 of the Requirements for the quality of the universal postal service: The universal service provider shall submit to the Postal Regulatory Authority the measurement methodology of 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.

4.3.3. Instruments for protecting consumer issues

21 of the 30 replying NRA's have answered that they check the information published/released by postal service providers to users on the particular features and conditions of the service. 9 NRA's have stated within their response that they do not check the respective data.

In total 29 NRA's have responded to this particular question. 10 NRA's are checking the respective information for the other postal service providers whereas 11 do not and 8 NRA's have not answered.

Table 28 – Control by the NRA of the information provision to users

Question	Answer	Count	Country	%
Do you check the information published / released by postal service providers to users on the particular features and conditions of the service (e.g. through inspections, verifying the operator's website)	Yes	21	BE, BG, CY, CZ, DK, ES, FR, FYROM, GR, HR, IE, LT, LU, LV, MT, NO, PT, RO, SI, SK, UK	70%
	No	9	AT, CH, DE, EE, FI, HU, NL, PL, SE	30%
If so, do you check it for the designated universal postal service providers	Yes	21	BE, BG, CY, CZ, DK, ES, FR, FYROM, GR, HR, IE, LT, LU, LV, MT, NO, PT, RO, SI, SK, UK	70%
	No	2	EE, PL	7%
	NA	7	AT, CH, DE, FI, HU, NL, SE	23%
If so, do you check it for the other postal service providers active in the universal service area	Yes	11	BE, BG, ES, FYROM, HR, GR, LT, MT, PT, RO, SI,	37%
	No	10	CY, CZ, DK, EE, FR, LU, LV, NO, PL, SK	33%
	NA	9	AT, CH, DE, FI, HU, IE, NL, SE, UK	30%
How do you check other postal providers active in the universal service area	Inspections	5	BG, FYROM, LT, MT, SI,	46%
	Verifying operators website	3	BG, ES, HR	27%
	Monitoring the media / press	3	HR, FR, MT	27%
If so, do you check that for the other postal service providers	Yes	10	BE, BG, ES, HR, FYROM, GR, LT, MT, PT, SI,	34%
	No	11	CY, CZ, DK, EE, FR, IE, LU, NO, PL, RO, SK	38%
	NA	8	AT, CH, DE, FI, HU, LV, NL, UK	28%
How do you check it for the other postal service providers	Inspections	4	BG, LT, MT, SI	40%
	Verifying operators website	4	BG, ES, HR, MT	40%
	Monitoring the media / press	2	BG, HR	20%

4.3.4. Co-operation between NRA's and other relevant parties for consumer issues

In total 25 of the responding 30 NRA's co-operate with other relevant parties as consumer bodies. 5 of the NRA's do not cooperate in such a way.

Table 29 - Cooperation between NRA's and other relevant parties for consumer issues

Question	Answer	Count	Country	%
Do you as NRA co-operate with other relevant parties as consumer bodies?	Yes	25	AT, BE, BG, CH, CY, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, IE, LT, LU, MT, NL, NO, PL, PT, RO, SI, UK	83%
	No	5	CZ, HU, LV, SK, SE	17%
If yes, please specify	Ombudsman	4	BE, DK, FI, GR	17%
	Consumer Authority	17	BG, CH, CY, DE, EE, ES, FR, FYROM, HR, LU, LT, MT, NL, PL, PT, RO, SI	71%
	Competition Authority	3	FYROM, NL, PL	12%

Portugal is presented below as country case regarding cooperation between ANACOM and the Directorate General for Consumer Protection

Table 30 - Country case Portugal

Portugal: The Portuguese NRA also cooperates with the Directorate General for Consumer Protection as to complaints and provision of information to consumers. Furthermore, the Directorate General for Consumer Protection and the consumers' representative organisations are heard by the NRA before the definition of:

- the quality of service targets that the USP has to comply with (which are defined in the Universal Postal Service Quality Convention);
- the rules for fixing the prices of the universal postal services (rules that are defined in the Universal Postal Service Price Convention).

4.3.5. Obligations and compensations concerning protection of users' rights consumer issues

The following tables show in more detail that most countries have foreseen a general information obligation especially regarding complaints procedures and the general information requirement:

Table 31 - Obligations and compensations concerning protection of users' rights consumer issues

Question	Answer	Count	Country	%
Do you foresee any obligations and compensations concerning protection of users' rights (e.g. publication of information about procedures to complain, publication of information about redress, publication of information about schemes for resolution of disputes)	Yes	18	BE, BG, CH, CY, CZ, ES, FR, FYROM, GR, HU, IE, LT, LU, PL, PT, RO, SI, SK	58%
	No	12	AT, DE, DK, EE, FI, HR, LV, MT, NL, NO, SE, UK	39%
	NA	1		3%

4.3.6. Compensations schemes set up for individual customers

In 60 % of the cases specific compensations schemes are set up. The following tables illustrate in more detail the scope and range of the protection of the consumers. Following their importance the corrective measures are described in the postal law, combination of the postal law and the secondary legislation, secondary legislation, licensing conditions, NRA decisions, convention and concession.

Table 32 - Compensations schemes set up for individual customers

Question	Answer	Count	Country	%
Was there a specific compensation scheme set up for individual customers (e.g. stamps)	Yes	18	BG, CY, CZ, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, MT, NL, PL, PT, SI, UK	60%
	No	12	AT, BE, CH, DE, DK, EE, LU, LV, NO, RO, SE, SK	40%
Do they concern: the designated universal postal service providers	Yes	19	BG, CY, CZ, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LV, MT, PL, PT, RO, SI, UK	63%
	No	3	DE, DK, LU	10%
	NA	8	AT, BE, CH, EE, NL, NO, SK, SE	27%
Do they concern: other postal service operators active in the universal service area	Yes	11	BG, ES, FI, FR, FYROM, GR, HU, IE, PL, RO, SI	37%
	No	11	CY, CZ, DK, DE, HR, LT, LU, LV, MT, PT, UK	37%
	NA	8	AT, BE, CH, EE, NL, NO, SK, SE	26%
Do they concern: other postal service operators	Yes	10	BG, CY, ES, FR, FYROM, GR, HU, PL, RO, SI	33%
	No	12	CZ, DE, DK, FI, HR, IE, LT, LU, LV, MT, PT, UK	40%
	NA	8	AT, BE, CH, EE, NL, NO, SK, SE	27%

Finland, Hungary and Slovenia are presented below as country cases regarding the compensations schemes set up for individual customers.

Table 33 - Country cases Finland, Hungary and Slovenia

Finland: According to the Postal Act the compensation to be paid to a party that has suffered damage because of a delay of an item will be the amount of the damage, but shall not exceed:

- 1) EUR 50 in the case of an ordinary item of correspondence;
- 2) EUR 85 in the case of a registered item of correspondence or an item of correspondence given against advice of receipt;
- 3) EUR 150 in the case of another item of correspondence or a postal package.

(2) The compensation to be paid to a party that has suffered damage because of damage to or loss of an item will be the amount of the damage, but shall not exceed:

- 1) EUR 50 in the case of an ordinary item of correspondence;
- 2) the agreed insured value in the case of an insured item;
- 3) EUR 340 in the case of another item of correspondence;
- 4) EUR 25 per kilo in the case of a postal package

Hungary: For all users of postal service, after they finished first step of complaint procedure to postal provider (for example, non-delivery of register mail), user can ask for compensation according to General Terms and in case of domestic non insured item providers pay 15 times postage for compensation. The charge paid against the service shall also be repaid by the postal provider. In case of insured (value guaranteed) item the compensation is equal of the value indicated in the value guarantee. In case of international items the compensation rules of the Letter Post Regulations of the Universal Postal Convention applies.

Slovenia: A provider of postal services shall pay a postal service user an allowance equivalent to the amount of damage caused; however, it shall not exceed the amounts laid down in the second paragraph below.

The maximum allowance for:

1. loss, damage, theft or robbery of an insured item shall be the postal item's stated value;
2. loss or theft of a postal parcel or of a registered postal item shall be the price paid for the executed postal service multiplied by a factor of 15;
3. theft or damage of a postal parcel or of a registered postal item shall be the price paid for the executed postal service multiplied by a factor of 10;
4. unexecuted, incomplete or incorrectly executed postal service relating to the routing of a registered and insured postal item or postal parcel shall be the price paid for the executed postal service;
5. exceeding the time limit for routing of a registered and insured postal item and of a postal parcel shall be the price paid for the executed postal service;
6. loss of a postal item with receipt shall be the price paid for the executed postal service.

In cases under points 1, 2 and 3 of the preceding paragraph, the user of postal services shall be entitled to reimbursement of the price paid for routing of the postal item, excluding the part of the price relating to postal item insurance.

4.3.7. Conclusion

In summary, the responses to the questions concerning the consumer issues have illustrated so far that the vast majority of the NRAs' are responsible for dealing with this subject.

However, the tables have also put some more light into the scope and range of the NRA's responsibilities in practice with regard to consumer issues. Those competences go from only limited powers to very specific powers about the precise handling of cases e.g. concerning the compensation of consumers.

Finally it is worth mentioning that in most of the cases there is a different regulatory framework in place for the USP and other postal service providers and that the responsibilities of the NRA's vary depending whether the USP or other postal service providers are involved.

4.4. Obligations imposed on postal service providers

“Obligations imposed on postal service providers to guarantee compliance with essential requirements due to the general authorisation and individual licence systems”.

Article 9 (1) of Directive 97/67/EC, amended by Directive 2008/6/EC, provides that for services which fall outside the scope of the universal service, Member States may introduce general authorizations, to the extent necessary to guarantee compliance with the essential requirements.

Essential requirements consist (according to point 19 of Article 2 to the Directive) of general non-economic reasons which can induce a Member State to impose conditions on the supply of postal services. These reasons are the confidentiality of correspondence, security of the network as regards the transport of dangerous goods, respect for the terms and conditions of employment, social security schemes, laid down by law, regulation or administrative provision and/or by collective agreement negotiated between national social partners, in accordance with Community and national law and, where justified, data protection, environmental protection and regional planning. Data protection may include personal data protection, the confidentiality of information transmitted or stored and protection of privacy.

For services which fall within the scope of the universal service, Article 9 (2) provides that Member States may introduce authorisation procedures, including individual licences, to the extent necessary in order to guarantee compliance with the said essential requirements and also to ensure the provision of the universal service. In this regard, according to the Directive, Member States may impose, if necessary and justified, requirements concerning the quality, availability and performance of the relevant services. Universal service obligations may only be imposed on designated USPs’.

Having this in mind, NRAs’ were particularly consulted about the requirements imposed on postal services providers concerning the compliance with the essential requirements and the quality, availability and performance of the services.

4.4.1. Obligations to guarantee compliance with essential requirements due to the general authorisation and individual licences systems

The following tables illustrate in more detail the obligations to guarantee compliance with essential requirements imposed by the general and individual licences systems set up across the NRAs’.

Table 34 - Obligations to guarantee compliance with the essential requirements imposed by the general and individual licence systems

Question	Answer	Count	Country	%
Does the general authorisation and individual licences systems impose: Obligations to guarantee compliance with essential requirements	Yes	29	AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FYROM, GR, HR, HU, IE, LT, LU, LV, MT, NL, PL. PT, RO, SE, SI, SK, UK	97%
	No	1	NO	3%

The ranking of the essential requirements (multiple answers possible) is illustrated below. Confidentiality is the most common essential requirement followed by data protection and security.

Table 35 - Which kind of essential requirements are imposed due to the general authorisation and individual licence systems

Question	Answer	Count	Country	%
Which kind of essential requirements are imposed due to the general authorisation and individual licence systems	Confidentiality of correspondence	25	AT, BG, CH, CY, CZ, DE, DK, EE, ES, FR, FYROM, GR, HR, HU, IE, LT, LU, LV, NL, PL, PT, RO, SE, SI, SK	32%
	Data protection	16	CH, CY, DK, EE, FR, FYROM, HR, HU, IE, LT, LV, PL, PT, RO, SI, SK	19%
	Security of the network as regards the transport of dangerous goods	15	CY, CZ, ES, FR, FYROM, HR, HU, IE, LT, LV, PL, PT, RO, SI, SK	19%
	Respect for the terms and conditions of employment, social security schemes	9	AT, CH, DK, FR, HR, LV, NL, PL, SI	11%
	Environmental protection	6	CY, IE, HR, LV, PT, SI	8%
	Regional planning	6	CH, CY, IE, LV, PT, SI	8%
	NA	2	FI, NO	3%

4.4.2. NRA responsible for verifying compliance with these obligations

In this table you can see which NRAs' have responsibilities for verifying compliance with these obligations. In some countries part of verification is a task of the police and in a lot of countries these obligations are applicable for all postal providers.

Table 36 - Responsibility for verifying compliance with these obligations

Question	Answer	Count	Country	%
NRA responsible for verifying compliance with these obligations	Yes	25	AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, HR, HU, IE, LT, LU, LV, MT, NL, PL, PT, RO, SE, SK	83%
	No	4	GR, FYROM, SI, UK	13%
	NA	1	NO	4%

4.4.3. Requirements concerning the quality, availability and performance of the services due to granting of authorisation

In most cases these requirements are only applicable for individual licence systems or only to some components of the universal service. In some cases quality requirements deal with availability of postal outlets, number of collections and distributions. In some cases the information is presented by the operators to the NRA which verifies or supervises these data. In other cases the NRA is working on the basis of complaints.

Table 37 - Requirements concerning the quality, availability and performance of the services

Question	Answer	Count	Country	%
Requirements concerning the quality, availability and performance of the services	Yes	21	AT, BE, BG, CH, CY, CZ, DK, EE, FI, HR, HU, LT, LU, LV, MT, NO, PL, RO, SK, SE, SI	70%
	No	9	DE, ES, FR, FYROM, GR, IE, NL, PT, UK	30%

4.4.4. Verification by the NRA regarding requirements concerning the quality, availability and performance of the services due to granting of authorisation

Table 38 - Responsibility for NRA for verifying compliance with these obligations

Question	Answer	Count	Country	%
Responsibility for verifying compliance with these obligations	Yes	22	AT, BE, BG, CH, CY, CZ, DK, EE, DE, FYROM, HR, HU, IE, LT, LV, MT, NO, PL, RO, SK, SE, SI,	92%
	No	2	GR, UK	8%

4.4.5. Conclusions

In summary, the responses to the related questions has illustrated that a vast majority of the NRAs' are imposing obligations to guarantee compliance with essential requirements through their general and individual licences systems.

Moreover, the answers underline quite clearly that confidentiality is the most common essential requirement followed by data protection and security.

Finally the responses point out that the overall majority of NRAs' are responsible for verifying compliance with the obligations concerning the quality, availability and performance of the services.

4.5. Collection and delivery

The Universal Service guarantees one clearance and delivery on each working day, in urban and rural areas. Concerning delivery the Directive is very clear:

“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.”

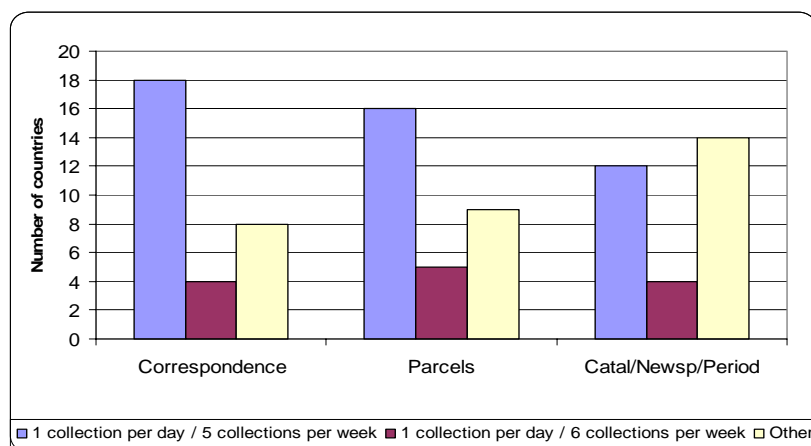
4.5.1. Requirements on the frequency of collection relating to the universal service

The frequency of collection for correspondence is in almost 60% of the countries 1 collection per day and 5 collections per week. In 13% of the countries (DK, FR, MT, NO and CH) the collection per week is extended for 1 day. There are 27% of the countries (8) with other mode of collection, for example 1-2 collections per day and/or more than 6 collections per week.

Regarding parcels, the mode of collection is similar to items of correspondence; there is an additional country (DE) with 1 collection per day and 6 collections per week, and 9 countries with other schedules of collection or having no or just partial requirements.

The picture is different as regards collection for catalogues, newspapers and periodicals, where almost 47% of the countries have no or partial requirements concerning the collection of these items. In 12 countries the collection occurs once a day and 5 times per week, and once a day and 6 times per week in FR, DE, MT and CH.

Figure 6 - Frequency of collection relating to Universal service



In BG, DK, EE, FR, DE, GR, RO and UK NRA’s grants exceptions to the guaranteed frequency of collection, namely in the following cases:

- Islands with few habitants or not regular ferry.
- USP's technological process.
- Rural areas with special geographical conditions.
- Health & Safety concerns.
- Difficult terrain – NRA grants maximum number of exceptions.
- Collection of letter boxes according to customer requirement.

In most of the cases, reason for exception is collection in islands; some of the other types of exceptions (certain parts of territory, lack of ferry services) can also be found in this category. One country stated that the exceptions are linked to low number of items which is due to the avoiding of the cost, which is the reason in 4 countries.

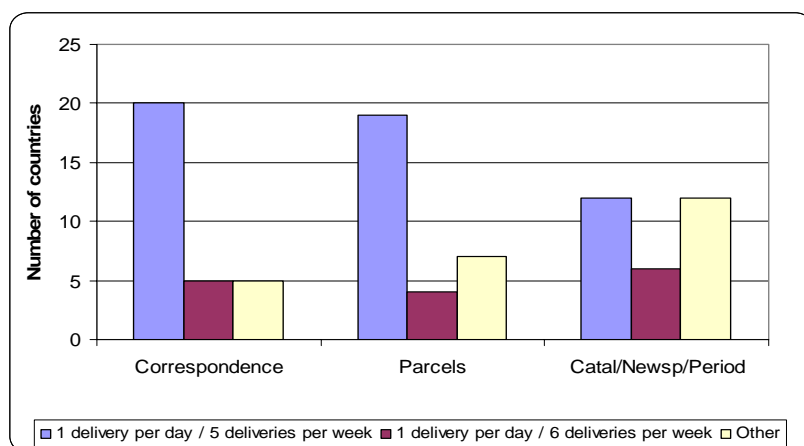
4.5.2. Requirements on the frequency of delivery relating to the universal service

As regards the requirements of frequency of delivery relating to the universal service in 20 countries, correspondence is delivered once a day and 5 times per week, while in DK, FR, DE, MT, NO and CH weekly delivery is extended for 1 day. In 5 countries the delivery occurs in a different mode or these countries have no requirements or just have partial requirements.

Regarding parcels, the mode of delivery is almost the same as correspondence; there is one country less, with 1 delivery a day and 6 deliveries per week, while 7 countries have no requirements or just have partial requirements.

The picture is again different as regards to delivery for catalogues, newspapers and periodicals, where 40% of countries have no requirements or just have partial requirements for the delivery of these items. In 12 countries collection occurs once a day and 5 times per week, and once a day and 6 times per week for newspapers in AT, FR, DE, LU, MT and CH.

Figure 7 - Frequency of delivery relating to the Universal service



Exceptions have been granted regarding frequency of delivery in BG, HR, EE, FR, DE, GR, IE, RO, NO, SK, SI, SE, CH and UK. In countries where they are familiar with exceptions to the guaranteed frequency of delivery, the NRA grants them in the following cases:

- islands with few habitants or not regular ferry;
- rural areas with special geographical conditions;
- health & safety concerns;
- customer's request;
- third person doesn't allow trespassing.

Reasons for exceptions are mainly geographical nature as well as delivery in islands. Costs for USP are also the reason for exception in 8 countries, the delivery of mail is in some cases performed less than 5 days per week. Tradition and weather conditions are not widely present. In 2 countries NRA grants (permanent and temporary) exceptions because of health and safety reasons for delivery persons.

4.5.3. USP's obligation to deliver mail on a certain number of working days

In DK, FR, DE, LV, MT, NL, NO, CH and UK the delivery of mail occurs 6 days per week.

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

The following differences in collection and/or delivery between geographic areas are known in BE, HR, DK, GR, ES, SE and UK:

- different time of last collection;
- exceptions have to apply in the case of special geographical or other circumstances;
- in rural areas there is an exception from the 5 day/week service;
- rural mail service implies delivery in collective letterbox installations along the mailman's route at some distance from the premises of the recipients.

4.5.5. USP's obligation to deliver mail within a specified time

SK is the only country where mail delivery must take place before 4.00 pm in urban and rural areas for households and businesses. In all other countries it is simply part of the USP's business model.

4.5.6. Specific rules concerning private letter boxes in your country

As regards the rules concerning the private letter boxes, 16 out of 30 countries answered negatively, while in other countries this subject is regulated through national legislation or simply follows the requirements of the standard covering that issue. It is not always standard EN 13724, some countries have their own regulation covering these issue.

Half of the countries have specific rules/regulation concerning installation of private letter boxes in multi-storey buildings. In countries where they have some regulation (usually part of Postal Services Act) these rules are explained as follows:

- There are established rules regarding installation height, numbering, names, opening, size of the box, etc ;
- The investor or owner of any apartment building shall put and maintain house mailboxes for the delivery of postal items in the appropriate place, not higher than the first floor, or at the entrance of the yard to the apartment building, and shall provide access to the house mailbox;
- Items of correspondence delivered to residential flats in apartment blocks must be delivered to apartment-specific letterboxes:
 - 1) on the placing of installations and minor structures required for the reception and delivery of items of correspondence; and
 - 2) by taking into account for postal delivery the local circumstances or the personal special needs arising from the age of addressees (at least 75 years old) or the addressee's disability or state of health.
- The mailboxes / private letter boxes to be installed in the buildings shall preferably be placed at the main doors or on the outside walls adjoining the property or, should this not be viable; they may be placed in the entrance hall in a location which is clearly visible and easily accessible to distributors.

In relation to buildings placed inside walled spaces, they shall be installed at the door providing access to the said spaces or in the outside wall zone immediately adjoining the access door.

Shopping centers, supermarkets or similar establishments shall be served by as many mailboxes / private letter boxes as the existing establishments, being these installed under the conditions foreseen for the separate fractions.

Each one or each set of mailboxes / private letter boxes, depending on whether it is a property with one or more residents, shall incorporate the term "post" in a clearly visible place.

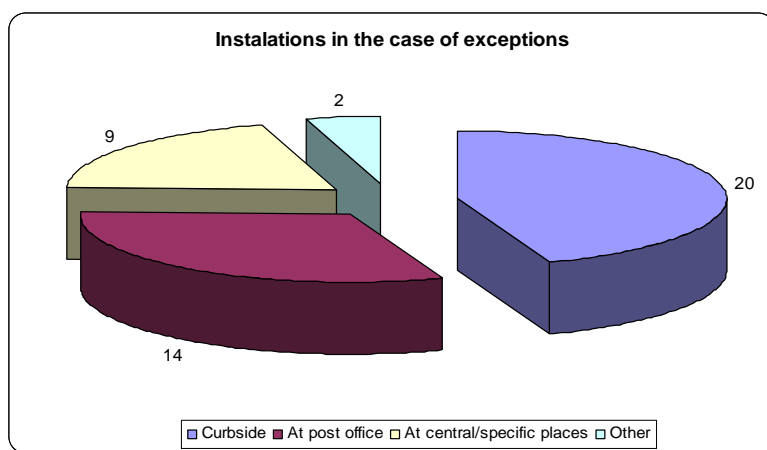
- Letter boxes have to be in the entrance, free access (not behind locked doors).
- Letterboxes in multi-apartment buildings shall be marked with the family or company name by individual apartments or business premises. They shall be installed in the ground floor and have free access. If the entrance to the building is locked, the owner or its keeper shall ensure free access to the letterboxes for the distributor. The way of access shall be agreed upon between the building's owner or the keeper, on the one hand, and the postal service provider, on the other hand.

The delivery of correspondence in the majority of cases (20) occurs via curbside letterboxes and via the counter in post offices (14). Delivery can also take place at central/specific places, and there are also possibilities for delivery at the boat or to the neighbors.

Reasons for this kind of delivery of correspondence are not only geographical nature (dispersed population or mountainous character), but also reduction of costs for USP. In one case, it was mentioned that Communities living in rural areas should not be in a disadvantaged position with respect to communities living in urban areas. It is also interesting that in 6 cases tradition was mentioned as one of the reasons for exception.

Other reasons such as: request from customer, agreement with local community, individual case or just part of the territory, where exceptions are granted, were mentioned in a lot of answers to this question

Figure 8 - Installations in the case of exceptions from providing the Universal service

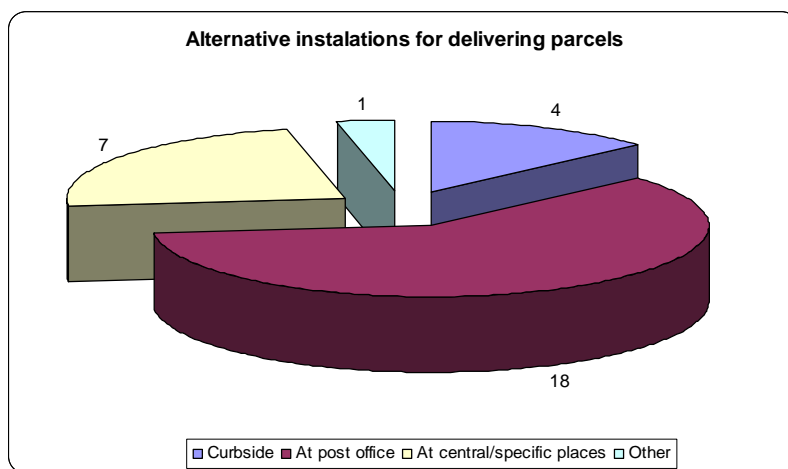


4.5.7. Delivery of parcels to alternative installations

Data have been collected about delivery of parcels to alternative installations, the choice of delivery to curbside, at post office, at central/specific places or other installations.

In most cases (18) delivery of parcels occurs at the post offices, there is also a significant number (7) of cases where delivery occurs at central/specific places. Delivery in curbside boxes is known in DE, NO and CH, while in SK delivery can be done at a neighbour (with his agreement). In some countries more than one solution is possible.

Figure 9 - Alternative installations for delivering parcels



Reasons for this kind of delivery of parcels are mainly (10) of financial nature (costs), as well as geographical and traditional nature. In many countries there is more than just one reason for this kind of delivery.

Other reasons for this kind of parcel delivery are the following:

- certain part of territory;
- customer's request;
- individual cases;
- no delivery of parcels in some rural areas;
- concern for security and health of USP's employees.

4.5.8. Delivery to alternative installations in case of impossibility of home delivery

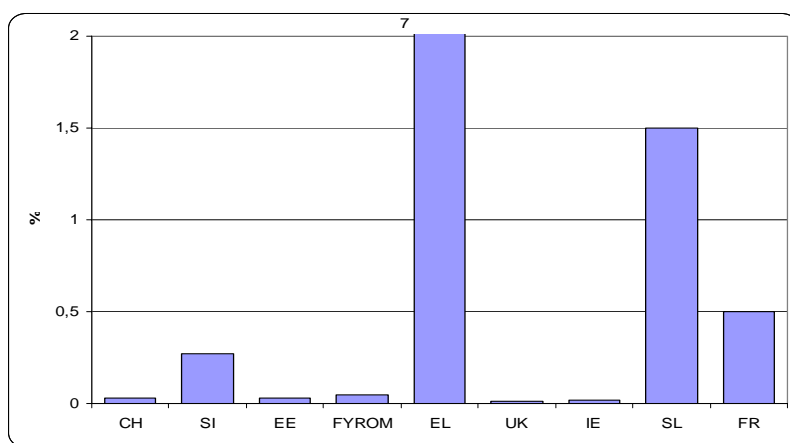
In more than half of the countries which answered the questionnaire, the NRA collects data on the number of installations for delivery in cases of exceptions.

In GR, LV, PT, SK, SI and ES, the NRA collects data on the number of curbside letter boxes and or on the number of this kind of delivery at post offices, while 4 NRA's collect data about delivery at central/specific places. 2 NRAs' have different methods of collection. CH for example collects data on the number of addresses with delivery less than 6 days per week.

Only in PT and ES NRAs' collect data on the volume of correspondence/parcels delivered at installations destined for exceptions, one for curbside letterboxes and another one for number of items per person in one year, needed for authorising delivery via curbside letterboxes.

26 out of 30 NRAs' do not collect data on the percentage of population that receives mail at installations destined for exceptions, while in GR, SI and ES collection is in most cases done because of legislation reasons.

Figure 10 – Delivery exceptions in 9 European countries (%)



The figure above shows an extremely high percentage of the population which is currently being serviced with alternative ways of delivery in EL (7 %). It does not include mail delivery on islands, but delivery in sparsely populated or mountainous areas.

The country case illustrated below is the case of Slovakia regarding exceptions from daily delivery.

Table 39 - Country case of Slovakia

<p>Slovakia: Requirements for the quality of the universal postal service, Article 8:</p> <p>4. Delivery according par. 1 of this article is not insured to:</p> <ul style="list-style-type: none"> a) places where security and health of employees of universal service provider is endangered, b) places with difficult access, c) reclusive settled place, d) settled place or residential unit with less than 50 inhabitants and if it is more than 1 km from the border of village with delivery service, e) business that receives less than 20 items a week and is more than 400 m from the built-up border of the village with delivery service, f) business that receives less than 50 items a week and is more than 1 000 m from the built-up border of the village with delivery service. 6) <p>Places according to par. a) to f) are exemptions from the universal service.</p> <p>5. For addressees who live in places according to par. 4 a) to f) of this article, or persons who permanently stay in place with orientation number or registered number (par.4 a) to f) of this article) delivery is insured by:</p> <ul style="list-style-type: none"> a) delivery at least twice a week (par.4c) to f) of this article), b) delivery to the delivery boxes (according par. 7) of this article), c) taking items away from the post office, d) other way what customer agreed with universal service provider. <p>Places according points a), b) are places with restricted delivery and places according points c), d) are places without delivery.</p> <p>6. The exceptions from universal service – places with restricted delivery and places without delivery are approved by the Postal Regulatory Authority.</p>
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4.5.9. Conclusions

The universal service guarantees one clearance and delivery every working day, in urban and rural areas. The frequency of collection for correspondence is in almost 60% of the countries 1 collection a day and 5 collections per week. In 17 % of countries the collection per week is extended for 1 day. There are 23 % of the countries with other mode of collection, for example 1-2 collections a day and/or more than 6 collections per week. As regards requirements of delivery frequency relating to the universal service, in 66% of 20 countries correspondence is delivered once a day and 5 times per week, while in 17 % of the countries, the weekly delivery is extended for 1 day. In 17 % of the countries, delivery occurs in a different way as they have no requirements or just have partial requirements. Half of the countries have specific rules concerning private letter boxes and also accept delivery to alternative installations in case of impossibility of home delivery.

4.6. Access points

4.6.1. Collection letterboxes

The table below shows that the majority of responding countries (77%) have set requirements/standards to ensure that an adequate number of collection letterboxes are provided by the Universal Service Provider. In half of the countries that have such requirements they can be found in the legislation; in 33% of the countries requirements are contained in regulations/decisions issued by the NRAs' and in 17% of the countries requirements are part of the Authorisation/Licence of the Universal Service Provider.

Table 40 - 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	23	AT, BE, BG, HR, CY, CZ, DK, EE, DE, FYROM, GR, HU, IE, LV, LT, MT, NL, NO, PL, RO, SI, SK, UK	77%
	No	6	CH, ES, FR, LU, PT, SE	20%
	No answer	1	FI	3%

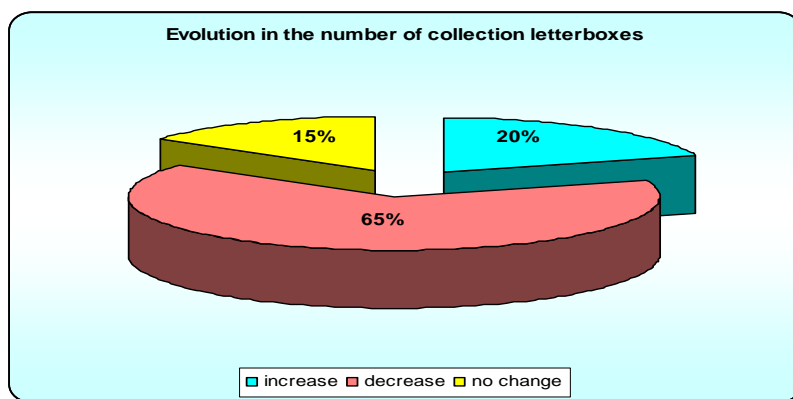
We shall not describe in detail applied criteria to determine the adequate number of collection letterboxes but the most mentioned criteria were the following:

- sufficient/suitable/adequate number of letterboxes (non specified number);
- minimum number of letterboxes;
- (maximum or average) distance to the letterbox;
- letterboxes per number of inhabitants;
- number of letterboxes per locality;
- percentage of the population at some distance from the letterbox;
- 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.

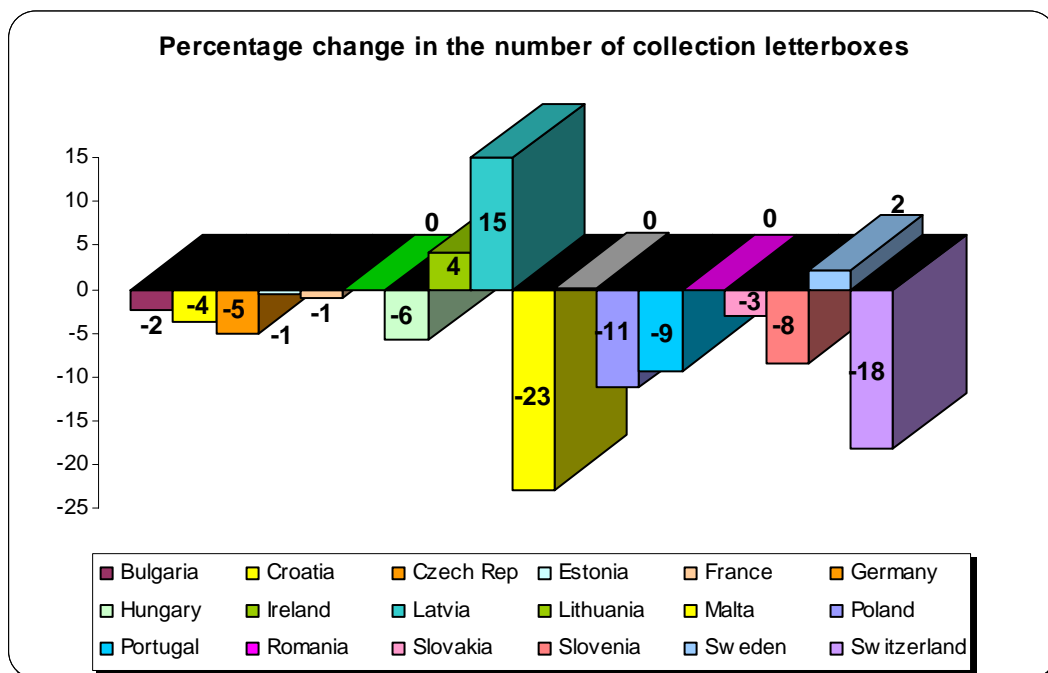
Furthermore we have collected information regarding the evolution in the number of collection letterboxes of the Universal Service Provider in the last 3 years (end of 2008 /end of 2010). 7 NRAs' are not in possession of this kind of information, while 3 NRA's have collected data only for 2008. 2/3 of the NRAs' are observing changes in the number of collection letterboxes, which are shown on the figure below.

Figure 11 - Evolution in the number of collection letterboxes



Analysis of the data provided by the NRAs' indicates that although a decreasing trend is observed in most of the responding countries, the percentage is not so significant, except in Lithuania, where the decrease in the number of collection letterboxes is 23%.

Figure 12 - Percentage change in the number of collection letterboxes



4.6.2. Postal establishments

The answers to this question are the same as to the question on collection letterboxes. In half of the countries that have such requirements they can be found in the legislation; in a quarter of the countries requirements are contained in regulations/decisions issued by the NRAs' and in 17% of the countries

requirements are part of the Authorisation/Licence of the Universal Service Provider. The exception is Belgium, where the requirements to ensure an adequate number of postal establishments can be found in the management contract between the State and bpost.

Table 41 - Requirements/standards to ensure an adequate number of postal establishments

Question	Answer	Count	Country	%
Requirements/standards to ensure an adequate number of postal establishments	Yes	23	AT, BE, BG, CH, CZ, DE,DK, EE, FI, FR, FYROM, HR, HU, LT, LV, MT, NL, NO, PL, RO, SK, SI, UK	77%
	No	7	CY, ES, GR, IE, LU, PT, SE	23%

We shall not describe in detail applied criteria to determine the adequate number of postal establishments but the most mentioned criteria were the following:

- minimum number of post offices;
- one post office per X number of inhabitants;
- number of post offices per locality (could depend on the size);
- percentage of the population served from a post office within some distance;
- distance to the nearest post office or between two post offices;
- time to travel to the post office;
- combination of criteria.

A difference in the criteria for urban and rural areas can be found. Although some of the criteria listed above are the same as for collection letterboxes, it should be noted that the applicable criteria to ensure an adequate number of postal establishments of the Universal Service Provider are more stringent than for letterboxes. 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.

On the questionnaire we have noted that there is a large diversity of the type of postal establishments at European level. The most common type is the permanent post office managed by the USP with full range of services, then the permanent post agencies managed by 3-rd entity, followed by permanent post offices with limited range of services, mail man offering basic postal services and mobile post offices.

The table below illustrates the distribution percentage of postal establishments in each of the 19 countries that answered this question. The table highlights the countries distinguishing themselves with a very low rate of permanent post offices with full range of services.

Table 42 - The distribution percentage of postal establishments in each of countries

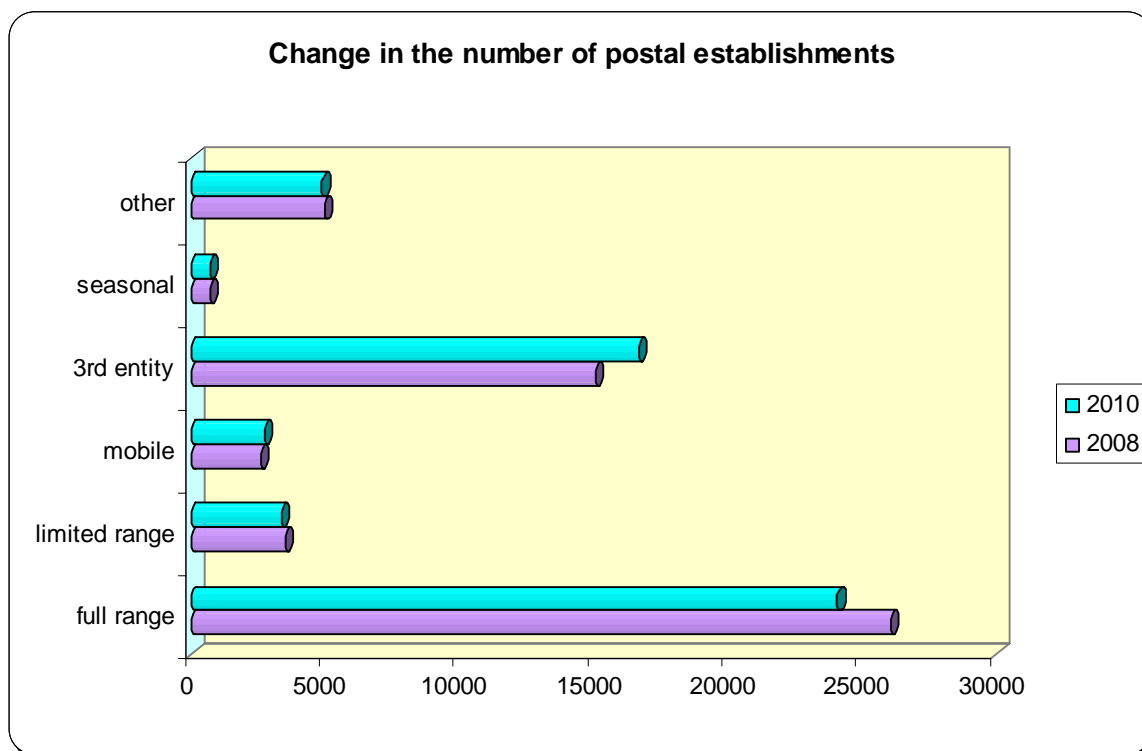
	Permanent PO full range	Permanent PO limited	Mobile PO	Mail man 1 ⁶	Mail man 2 ⁷	Seasonal PO	Permanent PA managed by 3rd entity	Other
Austria	33%	3%					64%	
Belgium	49,64%						50,36%	
Bulgaria	51%	2%		47%				
Czech Rep.	32,69%	0,15%			66,79%		0,80%	
Denmark	16%						84%	
France	60%						40%	
Greece	17,50%	66,90%	0,70%			14,90%		
Hungary	88,50%		11,50%					
Ireland	4,20%						95,80%	
Latvia	93,30%		0,20%	1,50%	5%			
Lithuania	83,14%	1,38%	15,48%					
Malta	51%		2%				47%	
Norway	12,50%						87,50%	
Poland	65%						35%	
Portugal	30,10%		0,40%				69,50%	
Slovakia	92,40%	4,50%	0,30%				2,80%	
Slovenia	95,34%	0,36%		3,76%		0,18%	0,36%	
Sweden	5%		34%				61%	
Switzerland	55,50%	0,20%	0,10%	34%			10,20%	

Furthermore information has been collected on the evolution in the number of postal establishment of the Universal Service Provider in the last 3 years (end of 2008 /end of 2010). Nearly half of the NRA's have answered this question. Two of them – Bulgaria and Germany – declared not to have noticed significant changes in the number of postal establishments in this 3-year period. In Hungary changes are also insignificant - postal establishments fell by 2. For the rest, in 9 countries there is a reduction in the number of postal establishments which vary from 0.3% to nearly 8%, while 5 countries register growth from 0.4% to 7%. The figure below presents a vision of the change in the number by type of postal establishments at European level.

⁶ Full range of services offered by postman of USP

⁷ Basic services offered by postman of USP

Figure 13 - The change in the number by type of postal establishments at European level



As a whole the reduction in the number of postal establishments is only 1%, the most significant drop being in the number of permanent post offices with full range of services – 7.7%, while the greatest increase appears to be in the number of permanent post agencies, managed by 3rd entity – 10.5%.

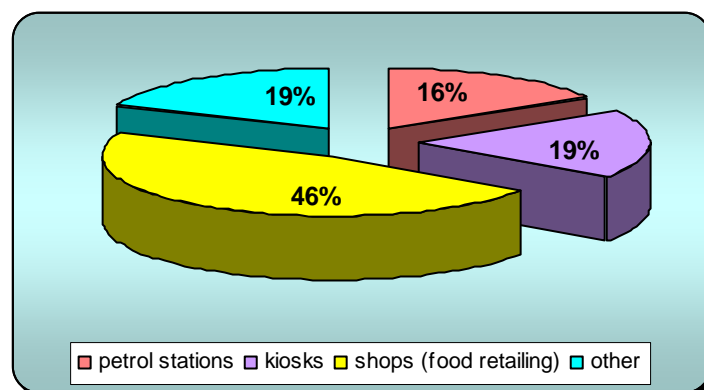
There is also increase by 4% in the number of mobile post offices. These growths indicate flexibility in the solutions of the USPs’.

We have also checked the power/role of the NRA in the closing/opening process of postal establishments or changing the opening hours of the postal establishments. Half of the NRAs’ have powers in that field but some of them have a limited power. Part of them have indicated the role of the NRA “to verify, to check, to monitor” compliance with certain requirements/criteria, but were asked if there are any consequences in case of non-compliance with these requirements and what is the power of the NRA. In such case they usually declared that they have no power in that field.

We have also collected information regarding the range of services offered by post agencies managed by third entities. From 19 responding NRA’s collecting this information a vast majority (14) stated that postal agencies, managed by 3rd entities offer full or almost full range of postal services, apart from financial services and some public services. 4 NRA’s pointed out that postal agencies, managed by 3rd entities offer basic counter postal services.

These agencies managed by third entities are mainly located in shops (food retailing), followed by kiosks and other⁸ places, while the lowest share goes to petrol stations. This is understandable because of all the places listed above, shops are the most visited.

Figure 14 - Location of post agencies managed by third parties



4.6.3. Conclusion

The fact that the majority (77%) of the countries consider necessary to regulate the number of collection letterboxes and postal establishments and the insertion in half of the countries of the relevant requirements in the legislation indicate that question is very sensitive.

We have noted that there is a large diversity of the type of postal establishments at European level. The most common type is the permanent post office managed by the USP with full range of services, then the permanent post agencies managed by 3-rd entity, followed by permanent post offices with limited range of services, mail man offering basic postal services and mobile post offices.

As a whole, the reduction in the number of postal establishments is only 1%, the most significant drop being in the number of permanent post offices with full range of services – 7.7%, while the greatest increase appears to be in the number of permanent post agencies, managed by 3rd entity – 10.5%. It cannot be drawn definite conclusion for some trend – obviously each country quantifies the type of postal establishments according to different circumstances.

⁸ Commercial banks (Belgium), municipal offices (Czech Rep., Slovakia), town halls (France), stationary shops (Greece, Malta), press shops and bookstores (Greece), premises of local business entities and local municipality/town council (Portugal), rural markets (Romania)

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 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, complaints, collection & delivery and access points (letter boxes and postal establishments).

Other indicators could also be used to monitor quality of service, end-user satisfaction and consumer protection.

As a next step, ERGP will analyse these data and try to detect trends on the market regarding the quality of service and ERGP will try to update the most important core indicators. Furthermore ERGP will also try to detect some best practices regarding monitoring of the quality of service. ERGP will also make a report on complaint handling and consumer protection including the measures in place at national level to ensure consumer protection and suggest best practices in this field to guarantee that transparent, simple and inexpensive procedures are available to users, particularly in cases involving loss, theft, damage or non-compliance with service quality standards.