Report on the implementation of the 2012 ERGP report on indicators to monitor the postal market

November 2014

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Country codes

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

[1] FY is also used in tables and figures for the Former Yugoslav Republic of Macedonia.

1. Executive summary

According to Directive 97/67/EC as amended by Directive 2008/6/EC (from now on Directive), 2013 was the first year of full postal market opening in the European Union. It is of great importance to follow up and understand the evolution of the postal markets for NRAs to perform their task as well as to allow a European benchmark of the market developments.

In 2012 ERGP prepared a report [document ERGP (12) 32] identifying 19 indicators to monitor market developments, grouped into seven main categories: market outcomes; market structure; revenues and volumes; access points; customer satisfaction; employment; investment. As a follow-up, this report aims at understanding whether those indicators are being implemented by the NRAs' members and observers of ERGP, as of 1st of January 2014, and providing useful insights on what practices are actually followed by NRAs[2].

This report is based on the answers of 33 NRAs to a questionnaire that was circulated in June 2014. The report follows (between chapters 5 and 11) mainly the structure of the ERGP's (12) 32 report.

Additionally, the questionnaire also collected information about whether NRAs monitor and collect information about digital mail services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce. The results are presented in chapter 12.

As introductory questions, two questions were asked concerning the legal powers of the NRAs to collect data and to publish data (chapter 4). Finally, the NRAs were questioned about the practices used to preserve the confidentiality of data (chapter 13).

As a general conclusion, this report shows that 10 of the 19 indicators identified by ERGP in the 2012 Report are being monitored by more than 50% of the NRAs (see Table 1 below). The 9 exceptions are identified in blue text. From these 9 indicators, it is relevant

[2] Please note that along the report the terms NRA and country are sometimes used indistinctly.

to mention that 2 NRAs plan to start monitoring, in the next two years, the investment in the postal sector.

Table 1 – Summary of indicators' implementation

Category	Indicator [ERGP (12) 32]	Percentage of NRAs implementing the indicator (33 NRAs=100%)		
		Yes	No, but planned to in the next 2 years	No [a)]
Market outcomes	End-user price of service provided at single piece tariff for typical residential customer	**85%**	0%	15%
	Price of service provided for bulk mail	**39%**	0%	61%
	Quality of service indicators*	**100%**	0%	0%
Market structure	Number of active postal service providers	**88%**	**3%**	9%
	Market shares by revenues/volumes	**91%**	0%	9%
	Concentration ratio index (CR_n) of the n largest providers	**45%**	0%	55%
	Herfindahl-Hirschman Index (HHI)	**36%**	0%	64%
Revenues and volumes	Total revenues on postal activities per GDP	**64%**	0%	36%
	Revenues	**97%**	0%	3%
	Volumes	**94%**	0%	6%
	Percentage of revenues (or volumes) of the reserved area	**18%**	0%	82%
Access points	Number of postal establishments	**97%**	0%	3%
	Postal coverage (number of postal establishments per 100 Km^2)	**30%**	0%	70%
	Postal density (Number of inhabitants per postal establishment)	**36%**	0%	64%
Customer satisfaction	Number of customer complaints by category	**79%**	0%	21%
	Number of customer complaints by category, as a percentage of the (correspondent) real mail volume	**39%**	0%	61%
	Customer satisfaction index	**42%**	0%	58%
Employment	Number of persons employed in the postal sector	**91%**	0%	9%
Investment	Investment in the postal sector	**39%**	**6%**	55%

* Quality of service indicators are dealt with by ERGP in another report. Please refer to it for a specific annalysis.

[a)] Includes "No", "Not applicable" and "No answers".

Only a minority of NRAs are collecting information on digital mail services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce (chapter 12).

2. Background and objectives

According to the Directive, 2013 was the first year of full postal market opening in the European Union.

A particular task of National Regulatory Authorities (NRAs) is to ensure compliance with the obligations arising from the Directive, in particular by establishing monitoring and regulatory procedures to ensure the provision of the universal service (Article 22, nr. 2).

It is of great importance to follow up and understand the evolution of the postal markets for NRAs to perform their task as well as to allow an European benchmark of the market developments.

In 2012 ERGP prepared a report identifying indicators to monitor market developments [document ERGP (12) 32][3].

There were 19 indicators identified and grouped into seven main categories: market outcomes; market structure; revenues and volumes; access points; customer satisfaction; employment; investment.

As a follow-up, ERGP decided, within its 2013-14 work programme, to review whether and how the indicators suggested by ERGP in the 2012's report are being implemented and applied by the NRAs' members and observers of ERGP, as of 1st of January 2014. Moreover, ERGP decided to review additional information on the practices followed by NRAs, such as: data sources used, frequency of collection, definition and aggregation of indicators, practices to preserve confidentiality, use of additional monitoring indicators.

This report aims only at understanding whether the indicators identified by ERGP to monitor market developments are being implemented by the NRAs' members and

[3] Available at http://ec.europa.eu/internal_market/ergp/docs/documentation/2012/121130_ergp-12-32-indicators-postal-market-report_en.pdf.

observers of ERGP and providing useful insights on what practices are actually followed by NRAs. Moreover, this report can be used as a basis for developing further work on market monitoring.

Since quality of service indicators are specifically dealt with by ERGP in another report, these will not be considered here.

3. Methodology

A questionnaire was circulated in June 2014 in order to gather information on NRAs experience regarding indicators for market monitoring. Responses were received between 14 June and 1 August 2014.

The questionnaire is the main source of information for this review[4].

The questionnaire followed mainly the structure of the 2012's ERGP report, where 19 indicators were identified and grouped into seven main categories: market outcomes; market structure; revenues and volumes; access points; customer satisfaction; employment; investment.

Additionally, the questionnaire also collected information about whether NRAs monitor and collect information about: digital mail services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce.

As introductory questions, two questions were asked concerning the legal powers of the NRAs to collect data and to publish data.

Questions for each of the 19 indicators were then presented, according to the overarching seven broad categories: market outcomes; market structure; revenues and volumes; access points; customer satisfaction; employment; investment.

For all the 19 indicators, common questions were addressed: to what extent is the NRA monitoring the indicator; from what sources and with what frequency is information collected. Moreover, when considered necessary, additional questions were addressed,

[4] Note: the accuracy of information as recorded in this report as being collected by the NRA is subject to accurate information being provided by the USP(s) and/or other postal service providers to the NRA in the first instance.

concerning the indicator's definition and/or its aggregation level. Finally, for each broad category of indicators two general questions were included, regarding: (1) the use of other indicators to monitor that category and (2) the use of the collected information.

When applicable, the same questions were addressed regarding the monitoring of indicators on digital mail services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce.

Finally, the NRAs were questioned about the practices used to preserve the confidentiality of data.

Full or partial answers were received from 33 NRAs, from the following countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, Former Yugoslav Republic of Macedonia, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, the Netherlands and the United Kingdom.

4. Power of NRAs to collect and publish data

The objective of this chapter is to have an overview about the power of NRAs to collect and publish data.

All the 33 NRAs that answered the questionnaire have powers to collect data from the postal service providers, the exception is the NRA of Norway whose power is limited to the collection of information on the universal service (US) provided by the universal service provider (USP). In Serbia, Hungary and the Netherlands it is considered that only the USP provides universal services as such.

In France the power to collect data is limited to the scope of licences (mail) and in Sweden it only covers letter mail distribution companies, which correspond to the postal service operators according to the Swedish postal law definition.

Table 2 – Powers of NRAs to collect data (in 2014)

	Answer	Count	Country (NRA)
From the USP on US	Yes	33	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, NO, PL, PT, RO, RS, SE, SI, SK, UK.
From the USP on non-US	Yes	32	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK.
	No	1	NO
From other PSP on US	Yes	29	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, PL, PT, RO, SE, SI, SK, UK.
	No	2	NO, NL
	Other	1	RS
	No answer	1	FI
From other PSP on non-US	Yes	31	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK.
	No	1	NO
	No answer	1	FI

Notes:

NL - In general ACM can request information necessary for performing its tasks from any person. So in that sense ACM has powers to collect data. In practice requests for information will mainly be addressed to postal service providers. ACM has therefore in theory also the power to collect data from other postal operators on US. However, as these service providers do not themselves provide universal services as such (in the sense of the Dutch Postal Act), in practice such a request will probably not be relevant.

FR - Power to collect data is limited to the scope of licences (mail).

HU - Only the designated USP offers US, individual licence holders not. Individual license holders and the USP can provide postal services substituting for the US. At moment only the USP offers Business letter (outside the USO) in this category. Postal services not substituting US (Express and courier) are provided by general licence holders and the USP.

PT - Collection is restricted to authorised or licenced postal services providers and to postal related statistics. A postal service provider must have an authorisation or a licence. Authorised and licenced postal providers must perform all 4 postal operations (collection, sorting, transport, distribution). Courrier providers are not included in the data collection process.

RS - We do not have other postal operators on US.

SE - Only postal operators according to the Swedish law definition which means that only letter mail distribution companies are covered.

SI - NRA has to explain its request for information and perform such request in proportion with its tasks.

UK - UK legislation gives Ofcom the power to request such information as it considers necessary for the purpose of carrying out any of its functions in relation to postal services. Ofcom's information-gathering powers are, therefore, limited and any data collection which it carries out must be targeted, proportionate and necessary by reference to its pre-defined postal functions.

All the 33 NRAs that answered the questionnaire have the powers to publish, or do publish, part of the information collected.

Table 3 – Does the NRA have power to publish the data collected?

Answer	Count	Country (NRA)
Yes	33	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, NO, PL, PT, RO, RS, SE, SI, SK, UK.

Notes:

BE – Except the data indicated as strictly confidential by the postal operator (subject to confidentiality and business sensitive information considerations).

NL – ACM does not have specific legal powers pertaining to the publication of collected data, but does publish e.g. reports based on data. Collected data are not published as such, but usually in some edited form. Publication should also have some relation to performing legal tasks by the NRA.

PT – Individual data may be confidential.

CZ - The NRA can publish aggregated data from the whole postal market, but cannot publish data, from which concrete entrepreneur could be identified.

DK - Only aggregate numbers are published.

EL - Aggregated data are published. Individual data only in internal or confidential reports.

FI – Limited information.

IE - Subject to confidentiality and commercially sensitive information considerations.

LT - NRA can publish data on market shares held by individual postal service providers, summary data on the volumes of items of correspondence and postal parcels, revenues generated in relation to the provision of the postal service, also the information related to the fulfilment of the obligation to provide the universal postal service.

MT – The NRA publishes only volume related data.

SE - Certain company specific data that is considered to be under business confidentiality cannot be published.

SI - NRA is legally liable to protect business confidentiality and other sensitive business data.

SK - NRA has power to publish only summarized data; to publish data of individual operators agree is necessary.

UK - Subject to confidentiality, proportionality and, as with the collection of the data, in relation to the carrying out of Ofcom's duties.

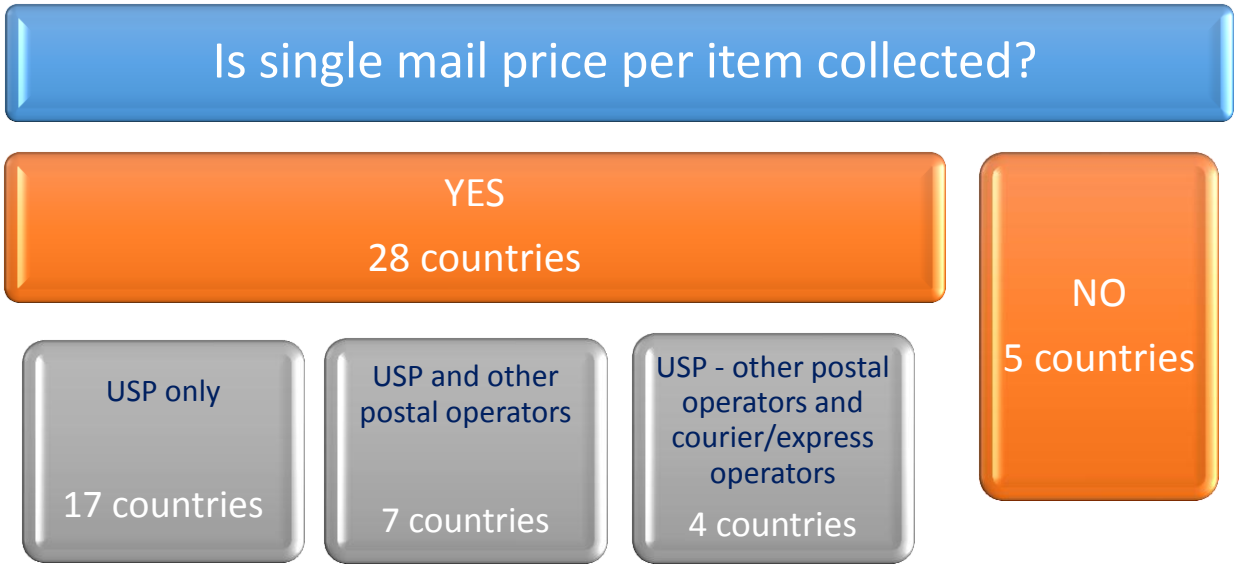
5. Market outcomes

5.1 End-user price of service provided at single piece tariff for typical residential customer

This is defined as the price for handling a standard individual single piece postal item offered to typical residential customers. It is an indicator that most of the countries are monitoring (28 out of 33) for the USP. There are 5 countries that do not collect this postal price at all: Estonia, Finland, Malta, Norway and Romania.

Out of the 28 that collect that data, only 4 countries (Bulgaria, Greece, Poland and Serbia) collect the postal price single piece tariff for any type of postal provider (USP and other postal providers as well as courier/express postal companies). Practically, these four countries monitor the price of all local postal market. There are 7 countries (Germany, Italy, Lithuania, Luxembourg, Slovakia, the Former Yugoslav Republic of Macedonia and the Netherlands) that collect this price data for USP and other postal providers. However, the majority of the countries (17) collect single tariff postal price for USP only (Austria, Belgium, Croatia, Cyprus, Czech Republic, Denmark, France, Hungary, Iceland, Ireland, Latvia, Portugal, Slovenia, Spain, Sweden, Switzerland and the United Kingdom).

Figure 1 – Single Mail Price collection mapping in Europe (33 countries)



From those countries that are monitoring and collecting such pricing data, in 13 countries (Czech Republic, Denmark, France, Germany, Iceland, Italy, Lithuania, Luxembourg, Poland, Serbia, Spain, Sweden and the Former Yugoslav Republic of Macedonia) NRA obtains the data directly from the postal provider(s). There are 6 countries that obtain the single price tariff data from public reports and accounts of the postal service providers (Croatia, Cyprus, Latvia, Slovakia, Switzerland and the United Kingdom). This price indicator is collected by 9 countries (Austria, Belgium, Bulgaria, Greece, Hungary, Ireland,

Portugal, Slovenia and the Netherlands) via other ways – such as price lists, ad-hoc notification by USP in case of price change and USP's website.

The majority of the countries (15) collect this price indicator on an annual basis, while 7 countries collect it continuously (Croatia, Hungary, Iceland, Ireland, Latvia, Slovakia and Sweden). There are 5 countries (Austria, France, Greece, Italy and Portugal) that collect this indicator ad- hoc and usually when a price change occurs.

All countries that collect single postal price are using the definition as set out in 2012 ERGP report except for the Netherlands that is using the definition as given in the Dutch Postal Act.

5.2 Price of service provided for bulk mail

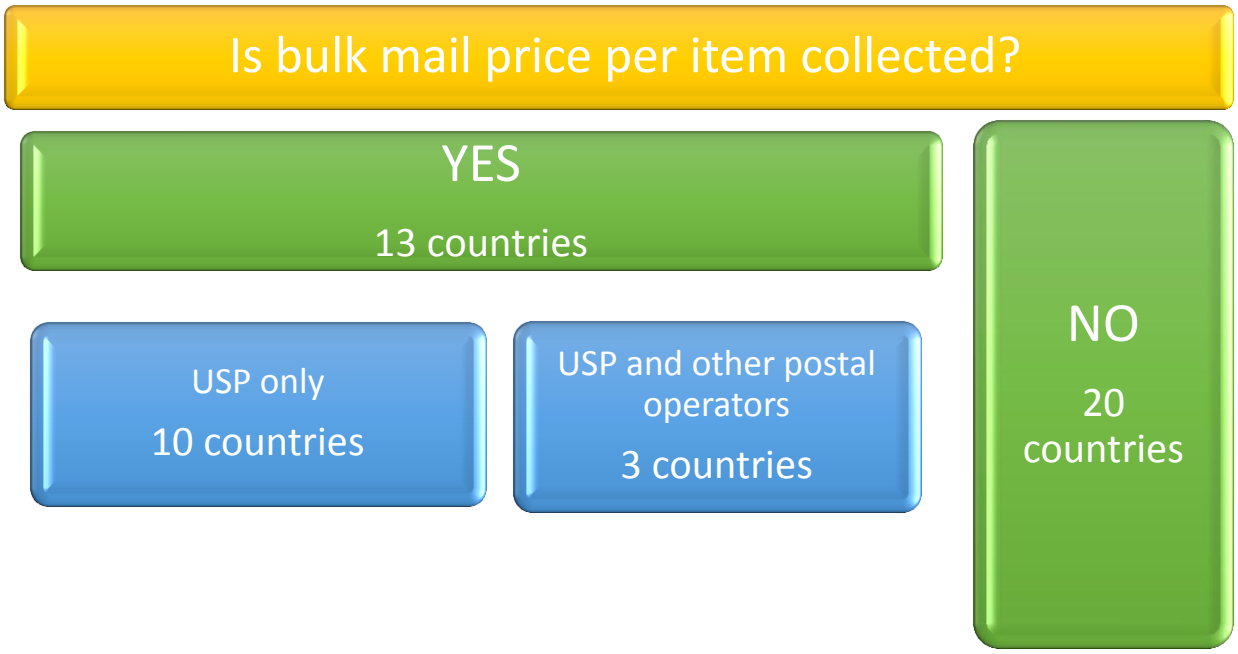
Bulk mail broadly refers to larger quantities of mail prepared for mailing, usually for businesses, bulk mailers or consolidators. Its price usually includes discounts, or is processed at a reduced postage rate, when compared to the price offered to end-user typical residential customer. This indicator would provide information on the price of bulk mail provided to senders of bulk mail, usually business customers (and not residential customers).

The majority of the countries (20) do not collect price data for bulk mail. The 13 countries that collect the price for bulk mail are Austria, Belgium, France, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Portugal, Serbia, the Former Yugoslav of Macedonia and the Netherlands. Ten of these countries (Austria, Belgium, France, Greece, Hungary, Iceland, Ireland, Latvia, Portugal and Serbia) obtain the bulk mail price for USP only, while the other 3 countries (Italy, the Former Yugoslav Republic of Macedonia and the Netherlands) collect the bulk mail price for both USP and other postal service provider(s). All countries that collect that data use the definition of this indicator as set out in the 2012 ERGP report.

Regarding the frequency of bulk mail price data collection, 6 countries (Austria, France, Greece, Hungary, Italy and Portugal) collect bulk mail price data ad-hoc, most often when a price change occurs. Belgium, Serbia and the Netherlands collect bulk mail price information on an annual basis, while the Former Yugoslav Republic of Macedonia

collects it bi-annually. There are three countries - Iceland, Ireland and Latvia - that collect bulk mail price continuously and it is only for USP.

Figure 2 – Bulk Mail Price collection mapping in Europe (33 countries)



5.3 Use of price indicators

Most of the countries are fully exploiting the price indicators that they obtain. Only 3 countries (Estonia, Switzerland and Romania) are not engaged in any possible way or via any channel for price publication or exploitation.

Table 4 – Use of pricing data

	Internal reports	Public reports (updates / annual reports)	For regulatory proposals / decisions	For possible investigations
AUSTRIA	✓	✓	✓	✓
BELGIUM	✓	✓	✓	✓
BULGARIA		✓	✓	✓
CROATIA	✓		✓	
CYPRUS		✓	✓	✓
CZECH REPUBLIC	✓	✓	✓	✓
DENMARK		✓	✓	✓
FINLAND	✓	✓	✓	✓
FRANCE	✓	✓	✓	✓
FYROM		✓		
GERMANY	✓	✓	✓	✓
GREECE	✓	✓	✓	✓
HUNGARY	✓	✓	✓	✓
ICELAND	✓	✓	✓	✓
IRELAND	✓		✓	✓
ITALY	✓	✓	✓	✓
LATVIA	✓	✓	✓	✓
LITHUANIA		✓	✓	✓
LUXEMBOURG			✓	
MALTA	✓	✓	✓	✓
NETHERLANDS		✓	✓	
NORWAY			✓	✓
POLAND	✓		✓	✓
PORTUGAL	✓	✓	✓	✓
SERBIA	✓	✓	✓	
SLOVAKIA	✓	✓		✓
SLOVENIA	✓	✓	✓	✓
SPAIN	✓	✓	✓	
SWEDEN	✓	✓	✓	✓

6. Market structure

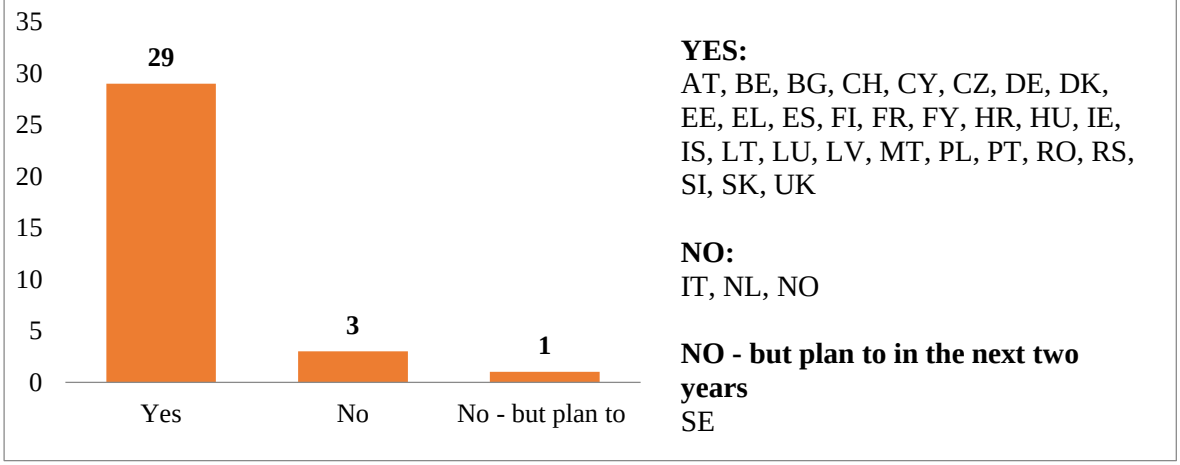
Indicators on market structure intend to give information on market features which produce the retail market outcomes.

6.1 Number of active postal service providers

This indicator corresponds to the number of postal service providers that are active in the market. For example, a postal service provider that is entitled to provide postal services but didn´t start its activities yet should not be considered [source: report ERGP (12) 32].

NRAs were asked if they collect/monitor the number of postal service providers. Of a total of 33 responses, 88% (29 responses) was positive indicating that the vast majority of NRAs collect/monitor this indicator.

Figure 3 – Countries collecting/monitoring the number of active postal service providers[5]



To the question about the source of the number of active postal service providers, 24 of the 29 NRAs indicated that they get this information directly (e. g. through questionnaires developed by NRA). Finland gets the number of active postal service providers through

[5] Notes:

BE – monitors only for USP and licenced operators. The NRA does not know exactly how many other postal service providers are active on the market but makes estimation thanks to different sources/databases (like national bank, national social security office...).

FR – these are the licenced postal operators.

IT - monitoring and collecting the number of active postal providers is made by the Ministry by granting licenses and authorizations. NRA monitors the number through the Ministry's database.

SE – activeness of small independent is currently not measured; only counting number of licensed operators.

reports/studies/market research made by third entities. Some of the countries use more than one source of the number of active postal service providers.

The majority of NRAs collect data about the number of active postal service providers continuously (48.3%) or annually (37.9%). Only three NRAs collect/monitor this indicator quarterly (Lithuania, Malta, Portugal) and Serbia collects it monthly.

Table 5 – Source and frequency of collection: number of active postal service providers

	Directly by the NRA (e.g. questionnaires developed by NRA)	**Public reports and accounts of the postal service providers**	**Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA)**	**Other**
Continuously	AT, CY, CZ, EL[6], FR[7], HR, HU[8], IS, LU, LV, SK[9], UK			FY[10], IE[11]
Monthly	RS	RS[12]		
Quarterly	LT, MT, PT			
Annually	BE, BG, CH, DE, DK, EE, PL, RO	SI[13]	DE[14], FI	ES[15]

When asked whether the definition of this indicator as set out in the 2012 ERGP report is used, 23 countries answered positive. Five countries have different or no exact definition and Finland did not provide the answer.

[6] EL – the source of information is EETT's registry.
[7] FR – the source of information is licencing.
[8] HU – the sources of information are licencing and notification system operated by the NRA.
[9] SK – postal service providers are obliged to register before starting of providing the postal services.
[10] FY – the sources of information are notifications and licencing.
[11] IE – the source of information is notifications and authorisations.
[12] RS – both directly by the NRA and public reports and accounts of the postal service providers.
[13] SI – NRA is keeping an official register of postal service providers. In addition NRA on an annual base collects information about the activity of registered postal service providers.
[14] DE – both by the NRA (questionnaires) and 3rd entities (market reports).
[15] ES – the source of information is the Register of Postal Operators.

Table 6 – Definition used of the number of active postal service providers

Question	Answer	Count	Country (NRA)	%
Do you use the definition of this indicator as set out in the 2012 ERGP report?	Yes	23	BE, BG, CH, CY, DE, DK[16], EE, EL, ES, FY, HR, HU, IS, LT, LU, MT, PL, PT[17], RO, RS, SI, SK, UK	79.3%
	No	5	AT[18], CZ[19], FR[20], IE[21], LV[22]	17.2%
	N/A	1	FI	3.4%

Aggregation level of this indicator varies between countries (Table 7). However, the number of postal service providers is commonly collected / monitored by providers or market.

[16] DK – all postal services providers with a license granted by the NRA are included.

[17] PT – data collection is restricted to authorised or licenced postal services providers. Authorised and licenced postal providers must perform all 4 postal operations (collection, sorting, distribution, delivery). Courier providers are not included in the data collection process.

[18] AT – according to the Austrian Postal Act, a "postal service provider" means undertakings which provide one or more postal services. All postal service providers are obliged to notify.

[19] CZ – does not have an exact definition.

[20] FR – only licenced postal operators.

[21] IE – there is a legal obligation on any person who is providing or intends to provide a postal service to notify ComReg of his or her intention to provide a postal service, as all postal service providers require authorisation by ComReg.

[22] LV – a merchant has the right to initiate a postal service if it is sent or personally submitted a registration notification message.

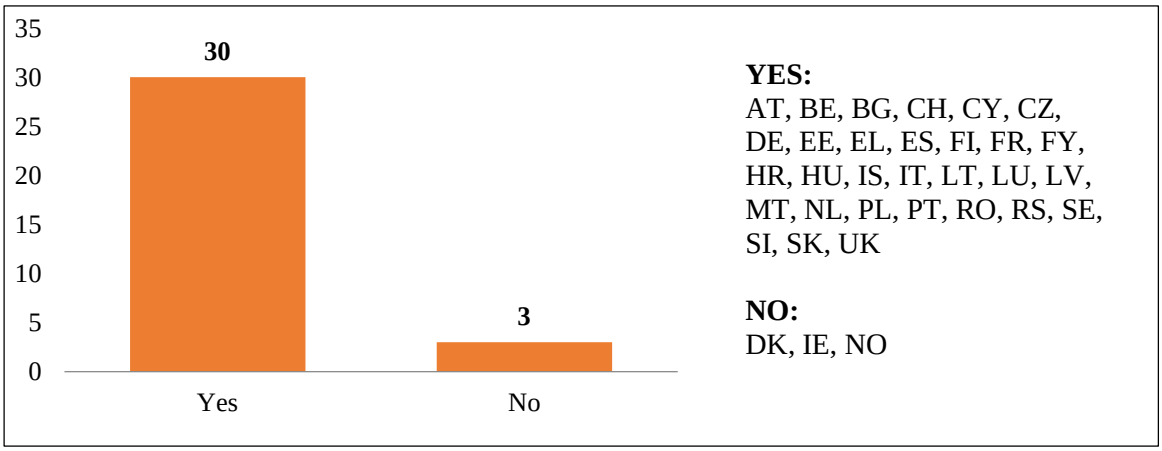
Table 7 – Aggregation level of collected/monitored number of active postal service providers

Country	By providers or market			By service			By destination				Observations
	All PSP	PSP active in the US area	PSP active outside the US area	Total services	Correspondence	Parcels	Total destination	Domestic	Outbound cross-border	Inbound cross-border	
AT	✓	✓	✓	✓							
BE	✓	✓	✓								
BG	✓	✓	✓	✓	✓	✓	✓	✓	✓		
CH	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
CZ	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
DE	✓			✓	✓	✓	✓	✓	✓	✓	
DK	✓	✓	✓								
EE	✓			✓			✓				
EL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
ES	✓			✓			✓				
FI		✓			✓	✓		✓			
FR				✓	✓				✓		Licenced providers
HR	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
HU	✓	✓	✓	✓			✓				
IE	✓	✓	✓	✓							
IS	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
LT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
LU	✓	✓	✓								
LV	✓	✓	✓	✓	✓	✓	✓		✓	✓	
MT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
PL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	In case of couriers services there is no data for correspondence and parcels separately.
PT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Additional category: non-express
RO	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
RS	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
SI	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
SK	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
UK		✓			✓			✓			The operators that OFCOM is aware of also provide parcel services, outbound and inbound services; however, it currently collects data only from those operators providing domestic letters.
TOTAL	**24**	**23**	**21**	**22**	**19**	**17**	**19**	**17**	**17**	**15**	

6.2 Market shares by revenues/volumes

As regards to the question concerning collection/monitoring of market shares by revenues or by volumes 30 out of 33 NRAs (i.e. 91%) answered that they do collect this indicator and 3 NRAs answered negatively. Italy mentioned that they monitor only the top 21 operators in terms of revenues.

Figure 4 – Countries collecting/monitoring market shares by revenues/volumes



Out of 30 NRAs, 27 collect/monitor market shares directly (e. g. through questionnaires developed by NRA). Belgium uses reports/studies/market research, made by third party working on behalf of the BIPT. Some of the countries use more than one source to collect/monitor market shares.

There are 19 NRAs that collect this indicator annually, 4 NRAs that collect it bi-annually and 6 NRAs that collect it quarterly. Iceland collects market shares on a case by case basis.

Table 8 – Source and frequency of collection/monitoring market shares by revenues/ volumes

	Directly by the NRA (e.g. questionnaires developed by NRA)	Public reports and accounts of the postal service providers	Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA)	Other
Quarterly	AT, HR, LT, MT, PT, UK			
Bi-annually	CY, FY, LV, SK			
Annually	BG, CH, CZ, DE, EE, EL, ES, FI, FR, IT, LU, PL, RO, RS, SE, SI	RS[23]	DE[24], BE	HU[25], NL[26],
Other	IS			

The most common aggregation level of this indicator is to collect/monitor market shares by market or by service (especially by domestic correspondence and parcels). Market shares by international traffic or by express is less common (Table 9).

Table 9 – Aggregation level of collected/monitored market shares by revenues/ volumes

Country	By providers or market	By service	By destination	Observations

[23] RS – both directly by the NRA and public reports and accounts of the postal service providers.
[24] DE – both by the NRA (questionnaires) and 3rd entities (market reports).
[25] HU – data supply of the SPs by law.
[26] NL – information provided by postal service providers (with more than € 2 million in turnover).

	All postal area	US area	Other non-US area	Express	Total service	Correspondence	Parcels	Total destination	Domestic	Outbound cross-border	Inbound cross-border	
AT	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	
BE	✓						✓					
BG	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
CH	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
DE						✓	✓					
EE	✓				✓			✓				
EL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
ES	✓				✓			✓				
FI		✓				✓	✓		✓			
FR												Only parcels of licenced postal operators
HR[27]	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	Additional category: courier services.
HU	✓	✓	✓	✓	✓	✓	✓	✓				
IS		✓			✓	✓	✓	✓	✓	✓	✓	
IT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
LT	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	Revenues are aggregated and not monitored by destination.
LU	✓											
LV	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
MT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
NL		✓	✓						✓			
PL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
PT	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Additional category: non-express
RO	✓		✓	✓	✓	✓	✓	✓	✓	✓	✓	
RS		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
SE						✓			✓			Only letters including addressed items under 2 kg
SI	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	Revenues are aggregated and not monitored by service or destination.
SK	✓			✓	✓	✓	✓	✓	✓	✓	✓	
UK		✓	✓			✓			✓			Also looking at existing, third party data for express and for parcel services.
TOTAL	**19**	**18**	**17**	**13**	**19**	**21**	**20**	**19**	**20**	**16**	**15**	

[27] HR - Correspondence and parcels on non-US area is only theoretic because items are differentiated by their weight.

6.3 Concentration ratio index (CRn) of the n largest providers

This indicator is the sum of the market shares of the largest providers in the market.

CR3 is the sum of the 3 largest providers; CR4 is the sum of the 4 largest providers, etc.

In general:

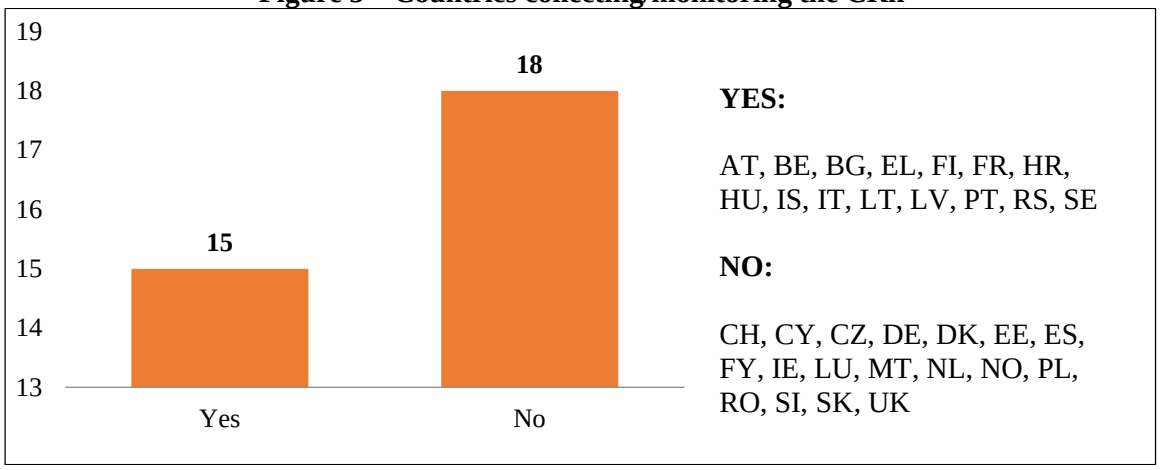
$CR_n = MS_1 + MS_2 + \ldots + MS_n$,

MS_1 is the market share of the largest provider; MS_2 is the market share of the second largest provider, and so on.

The higher the value of CR, the higher is the level of concentration of the market.

The majority of NRAs do not collect/monitor the concentration ratio index CRn. 55% of countries responded that they do not collect this indicator and 45% answered positive.

Figure 5 – Countries collecting/monitoring the CRn[28]



NRAs were questioned about the source of the CRn. The majority of NRAs (76.9%) collect data directly (e. g. through questionnaires developed by NRA). Serbia uses public reports and accounts of the postal service providers to collect necessary data. Belgium uses reports/studies/market research, made by third party working on behalf of the BIPT and Austria, Hungary use other sources. There are 8 of the 13 NRAs that collect/monitor the CRn annually; Latvia calculates it bi-annually and Austria quarterly.

[28] PT – the information quarterly collected by ANACOM allows calculation and monitoring Concentration Ratio indexes, on an ad-hoc basis and when necessary to prepare regulatory analyses and decisions.

Table 10 – The source and frequency of collection/monitoring the CRn

	Directly by the NRA (e.g. questionnaires developed by NRA)	Public reports and accounts of the postal service providers	Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA)	Other
Quarterly	AT[29]			
Bi-annually	LV			
Annually	BG, EL, HR, IT, LT, SE	RS	BE	
Other	FR[30], IS[31]			HU[32]

NRAs collect/monitor the CRn by different aggregation levels. The vast majority of the countries monitoring the CRn count it for all postal area, for universal postal service area or for other non-universal postal service area. Other aggregation levels are also used, however less than by market.

Table 11 – Aggregation level of the collected/monitored CRn

Country	By providers or market				By service			By destination				Observations
	All postal area	US area	Other non-US area	Express	Total service	Correspondence	Parcels	Total destination	Domestic	Outbound cross-border	Inbound cross-border	
AT	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	
BE	✓											
BG		✓	✓	✓								
EL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
HR	✓	✓	✓									
HU	✓	✓	✓	✓	✓	✓	✓	✓				There are data also about courier services separately. Correspondence and parcels on non-US area is only theoretic because items are differentiated only by their weight.
IT	✓	✓	✓	✓	✓			✓				
LT	✓				✓	✓	✓					
LV	✓	✓	✓	✓								
RS	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
SE						✓			✓			Only letters including addressed items under 2 kg

[29] AT – collects revenues and volumes of each PSP via questionnaire and calculates the CRn.

[30] FR – frequency depends on request.

[31] IS – collects data on a case by case basis.

[32] HU – data supply of the SPs annually by law, and CRn is counted occasionally as it is asked by any questionnaire.

Country	By providers or market				By service			By destination				Observations
	All postal area	US area	Other non-US area	Express	Total service	Correspondence	Parcels	Total destination	Domestic	Outbound cross-border	Inbound cross-border	
TOTAL	**9**	**8**	**8**	**6**	**6**	**6**	**5**	**5**	**4**	**3**	**3**	

6.4 Herfindahl-Hirschman Index (HHI)

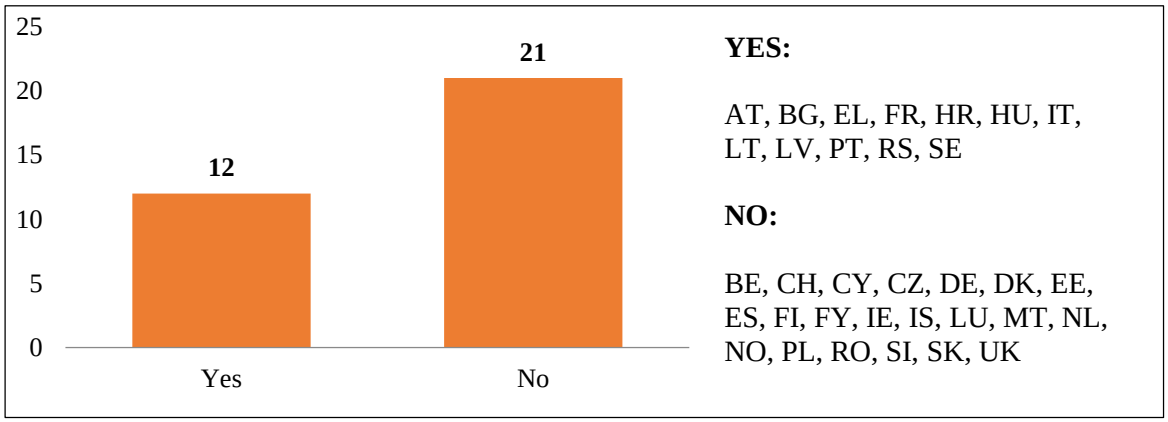
This indicator is the sum of the square of the market shares of the postal service providers:

$$HHI = MS_1^2 + MS_2^2 + \ldots + MS_n^2.$$

HHI ranges between 0 and 10000.

Only few NRAs collect this indicator. Of a total of 33 responses, 12 NRAs (36%) indicated that they collect/monitor the HHI and 21 NRAs (64%) indicated they don't.

Figure 6 – Countries collecting/monitoring HHI[33]



The vast majority (81.8%) of NRAs collecting/monitoring HHI does that directly (e. g. through questionnaires developed by NRA). Only Serbia uses public reports and accounts of the postal service providers. There are 7 of the 11 NRAs that collect/monitor HHI annually; Latvia calculates it bi-annually and Austria quarterly. Both France and Hungary count HHI whenever there is a request.

[33] PT – the information quarterly collected by ANACOM allows calculation and monitoring HHI, on an ad-hoc basis and when necessary to prepare regulatory analyses and decisions

Table 12 – The source and frequency of collection/monitoring HHI

	Directly by the NRA (e.g. questionnaires developed by NRA)	**Public reports and accounts of the postal service providers**	**Other**
Quarterly	AT[34]		
Bi-annually	LV		
Annually	BG, EL, HR, IT, LT, SE	RS	
Other	FR		HU[35]

When asked about the aggregation level of the collected/monitored HHI, most NRAs indicated that they count it usually by providers or market and less by destination.

Table 13 – Aggregation level of the collected/monitored HHI

Country	**By providers or market**				**By service**			**By destination**				**Observations**
	All postal area	US area	Other non-US area	Express	Total service	Correspondence	Parcels	Total destination	Domestic	Outbound cross-border	Inbound cross-border	
AT	✓	✓	✓		✓	✓	✓	✓	✓	✓	✓	
BG		✓	✓	✓						✓		
EL	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
HR	✓	✓	✓									
HU	✓	✓	✓	✓	✓	✓	✓	✓				There are data also about courier services separately. Correspondence and parcels on non-US area is only theoretic because items are differentiated only by their weight.
IT	✓	✓	✓	✓	✓			✓				
LT	✓				✓	✓	✓					
LV	✓	✓	✓	✓								
RS	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	
SE						✓			✓			Only letters including addressed items under 2 kg
TOTAL	**8**	**8**	**8**	**6**	**6**	**6**	**5**	**5**	**4**	**4**	**3**	

[34] AT – collects revenues and volumes of each PSP via questionnaire and calculates the HHI.

[35] HU – data supply of the SPs annually by law, and HHI is counted occasionally as it is asked by any questionnaire.

6.5 Other indicators about market structure

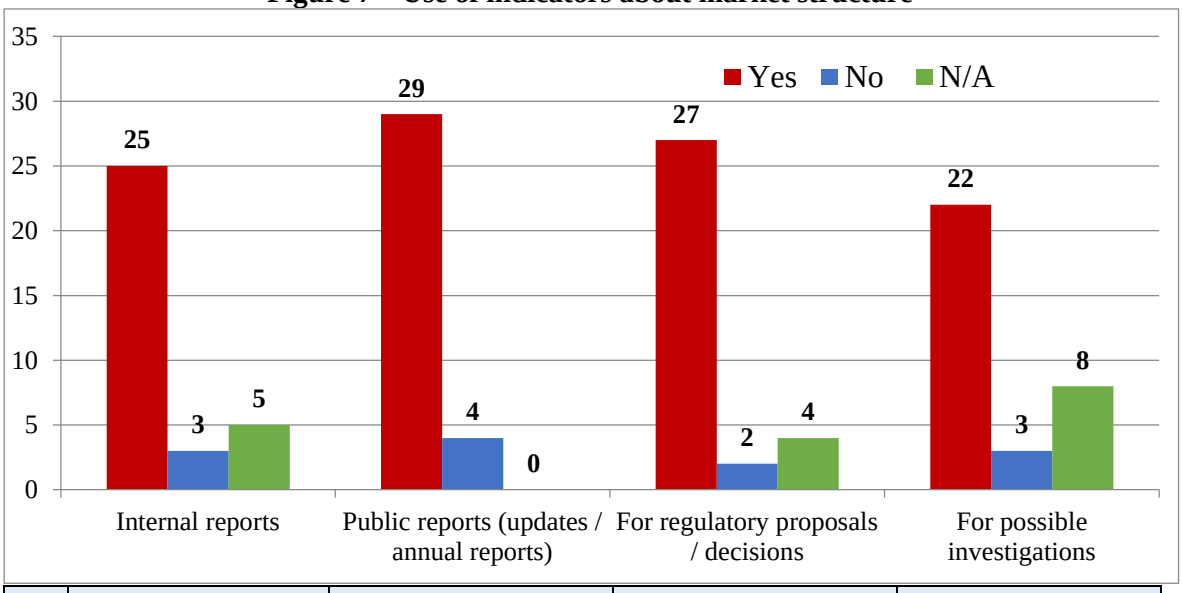
NRAs were questioned whether they use other monitoring indicators regarding market structure. Only 7 NRAs out of 33 answered that they use other indicators (Greece, Finland, Luxembourg, Malta, Portugal, Sweden and Slovenia). NRAs mentioned the following other relevant indicators, which are not already mentioned in the other categories of indicators in this report:

COUNTRY	Type of indicator
GREECE	Data on provider's infrastructure, personnel, vehicles, customers, expenses
SLOVENIA	The size of the network of postal operators (fixed assets such as contact offices, post offices, mail sorting centres, logistic centres, warehouses and mobile working assets such as for example motor vehicles, motorcycles, bikes of postal operators)
SWEDEN	Market shares on different letter mail sub-markets (e.g. bulk letter market, single letter market, 2nd class letter market)

6.6 Use of the indicators about market structure

In the questionnaire NRAs were asked what the collected, monitored or calculated information on the whole market structure indicators are used for. The vast majority of countries indicated that they collect, monitor or calculate information on market structure for internal reports (25 out of 33 NRAs), for public reports (29 out of 33 NRAs), for regulatory proposals/decisions (27 out of 33 NRAs) and for possible investigations (22 out of 33 NRAs).

Figure 7 – Use of indicators about market structure



	Internal reports	Public reports	For regulatory	For possible

		(updates / annual reports)	proposals / decisions	investigations
Yes	AT, BE, CH, CY, CZ, DE, EL, ES, FI, HR, HU, IE, IS, IT, LT, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK	BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK	AT, BE, BG, CH, CY, CZ, DE, DK, EL, ES, FI, HR, HU, IE, IS, IT, LT, LV, MT, NL, PL, PT, RO, RS, SE, SI, UK	AT, BE, BG, CH, CY, CZ, DE, DK, EL, HU, IE, IS, IT, LT, LV, MT, PL, PT, RO, SE, SI, UK
No	DK, LU, NO	AT, IS, LU, NO	LU, NO	HR, LU, NO,
N/A	BG, EE, FR, FY, NL		EE, FR, FY, SK	EE, ES, FI, FR, FY, NL, RS, SK

7. Revenues and volumes

7.1 Total revenues on postal activities per GDP

This indicator includes all revenues on the domestic market (including inbound market, i.e. the revenues received by the providers for the distribution of inbound cross-border postal items) and on outbound cross-border mail, divided by the value of GDP [source: ERGP (12) 32].

The majority of the countries (21 countries out of 32 respondents) monitor this indicator.

Table 14 – Monitoring of total revenues on postal activities per GDP

Answer	Yes	No
Countries	BE, CH, CY, DK, EL, ES, FI[36], FR, FY, HR, HU, IE[37], IS, IT, LT, MT, NO, PT, RO, RS, UK	AT, BG, CZ, DE, EE, LU, LV, NL, NO, PL, SI[38], SK
Count	21	12
Percentage	64 %	36 %

Most of NRA collect information on total revenues per capita by themselves.

Table 15 – Source of total revenues on postal activities per GDP

Answer	Directly by NRA	Public reports and accounts of the postal service	Reports/studies/market research made by 3rd entities commissioned or	Other

[36] FI - Partially

[37] IE - USP only by its regulatory accounts

[38] SI - NRA is monitoring only the fluctuation of the share of total postal revenue within the total revenue made by companies on an annual basis.

		providers	not by the NRA	
Countries	CH, EL, ES, FI, FR, FY, HR, IS, IT, LT, MT, PT, RO	CY, IE[39], RS	BE, UK	HU (data supply of the SP by law)
Count	13	3	2	1

The most common frequency of data collection is on an annual basis.

Table 16 – Frequency of collection of total revenues on postal activities per GDP

Answer	Annually	Bi-annually	Quarterly
Countries	BE, CH, CY, EL, ES, FI, FR, HR, HU[40], IE, IS, IT, LT, PT, RS, RO, UK	FY	MT
Count	17	1	1
Percentage	90 %	5 %	5 %

Most of the NRAs collect information beyond the scope of the universal service providers.

More than 1 third of NRAs collect information on courier and express operators.

Table 17 – Scope of collection of total revenues on postal activities per GDP

Answer	USP, other postal operators and courier and express operators	USP and other postal operators	USP only
Countries	BE, CH, EL, HU, IT, MT, RS	CY, ES, FR, FY, HR, LT[41], PT, RO, UK	FI, IE, IS
Count	7	9	3
Percentage	37 %	47 %	16 %

The definition that was provided in the 2012 report is widely used as 13 NRAs out of 17 say they use it.

Table 18 – Definition of total revenues on postal activities per GDP

Answer	Yes	No
Countries	BE, CH, EL, FR, FY, HR, HU, IS, IT, MT, PT[42], RO, RS	**ES :** Inbound cross border mail is not taken into consideration **IE :**This is reported by USP in disaggregated form in its Regulatory Accounts according to Accounting Direction **UK :** We only look at revenues over GDP when looking at international comparisons - which we do annually in our

[39] IE - Reported by USP in disaggregated form in its Regulatory Accounts according to Accounting Direction.

[40] HU - Data supply of the SPs annually by law, and Total revenues on postal activities per GDP is counted occasionally as it is asked by any questionnaire.

[41] LT - No differentiation between courier, express operators and other postal service providers

[42] PT - Our exact definition: Revenues must be calculated prior to the application of the VAT and shall not include revenues from other activities other than the provision of postal services, nor revenues from dealings between companies of the same group. To note that we also collect the following additional indicator: "Total revenues of postal service providers/GDP" (where the total revenues are extracted from the official accounts of each postal service provider, which include the revenues of postal services provided by each company and of its eventual additional activities".

		International Communications Market Report, using third party data commissioned by Ofcom but collected by external agencies. **LT :** It includes all revenues on the domestic and cross-border market, divided by the value of GDP.
Count	13	4
Percentage	76 %	24 %

No answer: CY, FI

7.2 Revenues

Almost all NRAs monitor revenue indicators.

Table 19 – Monitoring of revenues

Answer	Yes	No
Countries	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IT, IS, LT, LU, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK	NO
Count	32	1
Percentage	97 %	3 %

For revenues also, NRAs mostly collect information by themselves.

Table 20 – Source of revenues

Answer	Directly by NRA	Public reports and accounts of the postal service providers	Reports/studies/market research made by 3rd entities commissioned or not by the NRA	Other
Countries	AT, BE, BG, CH, CZ, DE, DK, EE, EL, FI, FR, FY, HR, IT, IS, LT, LU, LV, MT, PL, PT, RO, SI, UK	CY, DE, IE[43], RS, SK[44]	BE, SE	ES[45], HU[46], NL[47], UK[48]
Count	24	5	2	4

The most common frequency of data collection is on an annual basis.

Table 21 – Frequency of collection of revenues

Answer	Annually	Bi-annually	Quarterly	Other
Countries	BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HU, IE, IT, LT, LU, NL, PL, RO, RS, SE, SI	FY, LV, SK	AT, HR, LT, MT, PT	IS: Continuously
Count	23	3	5	1

[43] IE - Public reports and accounts of the postal service providers - USP only

[44] SK - Through the state statistical data collection

[45] ES- Information comes from the registry of operators

[46] HU - data supply of the SP by law

[47] NL - Information provided by postal service providers (with more than € 2 min in turnover)

[48] UK - A mix of the above - we get information from the USP monthly, quarterly and annually and information from other operators quarterly

Percentage	72 %	9 %	16 %	3 %

For revenues, most of NRAs also collect information beyond the scope of the sole universal service provider.

Table 22 – Scope of collection of revenues – by operator

Answer	USP, other postal operators and courier and express operators	USP and other postal operators	USP only	Other
Countries	BE, BG, CH, EE, EL, HU, IT, LV, MT, PL, RO, RS	AT, CZ, DK, ES, FR, FY, HR, LT[49], LU, NL, PT, SI, SK[50], UK	CY, FI, IE, IS	PT[51], SE[52]
Count	12	14	4	2
Percentage	37 %	44 %	13 %	6 %

Table 23 – Scope of collection of revenues - by service

Granularity	Countries	Count
Total	AT, BE, BG, CH, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, IS, LT, LV, MT, PL, PT, RO, RS, SK, UK	26
Correspondence	AT, BE, BG, CH, CZ, DE, DK, EL, FI, FR, HU, IE, IT, IS, LT, MT, NL, PL, PT, RS, SK, UK	22
Parcels	AT, BE, BG, CH, CZ, DE, DK, EL, FI, FR, HU, IE, IT, IS, LT, MT, PL, PT, RS, SK, UK[53]	21
Others	EL : small parcels <2kg FR : newspapers, registered mail, direct marketing, bulk/single piece, metered mail/stamped mail, express, priority/non priority PT : Express/non express SE : Letter mail	4

Note: HU - Correspondence and parcels on non-US area is only theoretic because items are differentiated only by their weight.

Table 24 – Scope of collection of revenues - by destination

Granularity	Countries	Count
Total	AT, BG, CH, CZ, DE, DK, EE, EL, ES, FR, HR, HU, IE, IS, IT, LT, MT, PL, PT, RO, RS, SK	22
Domestic	AT, BG, CH, CZ, DE, DK, EL, FR, HR, IE, IS, IT, MT, NL, PL, PT, RO, RS, SK	19
Outbound cross-border	AT, BG, CH, CZ, DE, DK, EL, FR, IE, IS, IT, MT, PL, PT, RO, RS, SK	17
Inbound cross-border	AT, BG, CH, CZ, DE, DK, FR, IE, IS, IT, MT, PL, PT, RO, RS, SK	16

[49] LT - No differentiation between courier, express operators and other postal service providers

[50] SK - USP submit the results of separate accounting half a year

[51] PT - Data collection is restricted to authorised or licenced postal services providers. Authorised and licenced postal providers must perform all 4 postal operations (collection, sorting, transport, distribution).

[52] SE - USP and non USP letter mail operator

[53] UK - Although we don't explicitly collect parcel information at present, we do use third party reports and existing data to look at parcel volumes.

7.3 Volumes

NRAs who monitor volume indicators also monitor turnover (revenues) indicators.

Table 25 – Monitoring of volumes

Answer	Yes	No
Countries	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK	NO, LU
Count	31	2
Percentage	94 %	6 %

Most of the NRAs collect the relevant information themselves.

Table 26 – Source of volumes

Answer	Directly by NRA	Public reports and accounts of the postal service providers	Reports/studies/market research made by 3rd entities commissioned or not by the NRA	Other
Countries	AT, BG, CH, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, IS, IT, LT, LV, MT, PL, PT, RO, SI, UK	CY, DE, IE[54], RS, SE	BE	HU[55], NL[56], SK[57], UK[58]
Count	23	5	1	4

Most of the NRAs collect information on an annual basis.

Table 27 – Frequency of collection of volumes

Answer	Annually	Bi-annually	Quarterly	Other
Countries	BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HU, IE, IT, LT, NL, PL, RO, RS, SE, SI	FY, LV, SK	AT, DK[59] HR, LT, MT, PT	IS : Continuously
Count	22	3	6	1

The majority of NRAs collect information beyond the perimeter of the USP only.

[54] IE - USP only

[55] HU - data supply of the SP by law

[56] NL - Information provided by postal service providers (with more than € 2 min in turnover)

[57] SK - Through the state statistical data collection

[58] UK - A mix of the above - we get information from the USP monthly, quarterly and annually and information from other operators quarterly

[59] DK - On addressed mail by the USP

Table 28 – Scope of collection of volumes – by operator

Answer	USP, other postal operators and courier and express operators	USP and other postal operators	USP only	Other
Countries	BG, CH, EE, EL, FI[60], HU, IT, LV, MT, PL, RO, RS	AT, CY, CZ, DK, ES, FR, FY, HR, LT[61], NL, PT, SI, SK, UK	BE, IE, IS	PT[62], SE[63]
Count	12	14	3	2
Percentage	39 %	45 %	10 %	6 %

The majority of NRAs monitor information on both correspondence and parcels.

Table 29 – Scope of collection of volumes – by service

Granularity	Countries	Count
Total	AT, BE, BG, CH, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IS, IT, LT, LV, MT, PL, PT, RO, RS, SI, SK, UK	27
Correspondence	AT, BE, BG, CH, CZ, DE, DK, EL, FI, FR, HR, HU, IE, IS, IT, LT, MT, NL, PL, PT, RO, RS, SI, SK, UK	25
Parcels	AT, BE, BG, CH, CZ, DE, DK, EL, FI, FR, HR, HU, IE, IS, IT, LT, MT, PL, PT, RO, RS, SI, SK, UK[64]	24
Others	EL : small parcels <2kg FR : newspapers, registered mail, direct marketing, bulk/single piece, metered mail/stamped mail, express, priority/non priority PT : Express/non express RO: Express SE : Letter mail	5

Note:
HU: Correspondence and parcels on non-US area is only theoretic because items are differentiated only by their weight.

More than half of the NRAs collect information on volumes by destination.

Table 30 – Scope of collection of volumes – by destination

Granularity	Countries	Count
Total	AT, BG, CH, CZ; DE, EE, EL, ES, FR, HR, HU, IS, IT, LT, MT, PL, PT, RO, RS, SI, SK	21
Domestic	AT, BG, CH, CZ, DE, EL, FR, HR, HU, IS, IT, LT, MT, NL, PL, PT, RO, RS, SI, SK	20
Outbound cross-border	AT, BG, CH, CZ, DE, EL, FR, HR, HU, IS, IT, LT, MT, PL, PT, RO, RS, SI, SK	19
Inbound cross-border	AT, BG, CH, CZ, DE, FR, HR, HU, IS, IT, LT, MT, PL, PT, RO, RS, SI, SK	18

[60] FI - Partially

[61] LT - No differentiation between courier, express operators and other postal service providers

[62] PT - Data collection is restricted to authorised or licenced postal services providers. Authorised and licenced postal providers must perform all 4 postal operations (collection, sorting, transport, distribution).

[63] SE - USP and non USP letter mail operator

[64] UK - Although we don't explicitly collect parcel information at present, we do use third party reports and existing data to look at parcel volumes.

7.4 Percentage of revenues (or volumes) of the reserved area

Following the publication of Directive 2008/6/CE, reserved areas were fully abolished within Member States of the Europena Union since 2013[65]. It may explain why most of countries replied that this indicator is not monitored and why others did not reply.

More than half of the NRAs do not monitor this indicator.

Table 31 – Monitoring of revenues/volumes of the reserved area

Answer	Yes	No	N/A
Countries	CY, FY, IS, IT, MT, NO	AT, BE, BG, CH, CZ, DK, EE, FR, HR, HU, IE, LT, LV, PL, PT, SE, SI, SK, UK	DE, EL, FI, NL
Count	6	19	4

Table 32 – Source of revenues/volumes of the reserved area

Answer	Directly by NRA	Public reports and accounts of the postal service providers	Reports/studies/market research made by 3rd entities commissioned or not by the NRA	Other
Countries	FY, IS, IT, MT,	CY, RS		NO[66]
Count	4	2	0	1

NRAs who monitor this information mostly collect it directly.

Table 33 – Frequency of collection of revenues/volumes of the reserved area

Answer	Annually	Bi-annually	Quarterly	Other
Countries	CY, IT, NO	FY	MT	IS[67]
Count	3	1	1	1

7.5 Other indicators on revenues and volumes

NRAs were questioned whether they use other monitoring indicators regarding revenues and volumes. The majority answered that they do not.

Table 34 – Other indicators regarding revenues or volumes

Answer	Yes	No
Countries	EL[68], HU[69], PT[70], SE[71], SI[72], SK[73], UK[74]	AT, BE, BG, CH, CY, CZ, DE, DK, EE, ES, FI, FR, FY, HR, IE, IS, IT, LT, LV, MT, NL, NO, PL, RO, RS

[65] Without prejudice of Member States' right to organise the siting of letter boxes on the public highway, the issue of postage stamps and the registered mail service used in the course of judicial or administrative procedures in accordance with their national legislation (according to article 8 of the Directive).

[66] NO - Report from the USP to the NRA

[67] IS - Continuously

[68] EL - Volume and revenue according to weight of postal items and type of customer

Count	7	25
Percentage	22 %	78 %

7.6 Use of the indicators about revenues and volumes

Information collected is almost always used for different purposes.

Table 35 –Use of indicators regarding revenues or volumes

Answer	Internal reports	Public reports (updates / annual reports)	For regulatory proposals / decisions	For possible investigations
Countries	AT, BE, CH, CY, CZ, DE, DK, EL, ES, FI, HR, HU, IE, IS, IT, LT, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IT, LT, LV, MT, NL, PL, PT, RO, RS, SE, SI, SK, UK	AT, BE, BG, CH, CY, CZ, DE, DK, EL, ES, FR, HR, HU, IE, IS, IT, LT, LV, MT, NL, NO, PL, PT, RO, RS, SE, SI, UK	AT, BE, BG, CH, CY, CZ, DE, DK, EL, HR, HU, IE, IS, IT, LT, LV, MT, NO, PL, PT, RO, RS, SE, SI, UK
Count	26	29	28	25

8. Access Points

8.1 Number of postal establishments

Postal establishments are the establishments open to the public where customers may apply for postal services. These postal establishments may be owned and staffed by the postal service provider, may be owned by the postal service provider and staffed by persons from outside the postal service provider, may be owned by 3rd entities and provide postal services of the postal service provider under a contract (for example a postal establishment usually named agency), may be permanent (fixed) or a mobile establishment (for example

[69] HU - Number of US items / 100 citizens

[70] PT - The information quarterly collected by ANACOM allows to calculate and monitor other indicators, including to calculate the percentage of revenues (or volumes) of the reserved area and to calculate indicators on revenues and on volumes with a higher level of granularity (e.g. by service, destination inbound and outbound), on an ad-hoc basis and when necessary to prepare regulatory analyses and decisions.

[71] SE - Volumes and revenues on sub-markets of letter mail

[72] SI – The NRA is monitoring the volumes of US-area and non-US area separately and due to different type of service provided by US and non-US area, providing only the comparison USP business parcel/ CEP parcels non-US on domestic market and inbound cross border and express mail USP/express mail non-US on domestic market and inbound cross border.

[73] SK - Operating and financial revenues, extraordinary incomes

[74] UK - Volumes and revenues by service provider, product and other variations of granularity

set up in a road transport vehicle). It also includes delivery staff providing services similar to counter services. It corresponds to category ACC202 of Eurostat[75]. It does not include other access points, such as letter boxes or similar access points, where customers exclusively deposit postal items. It also does not include points where only stamps, or similar, are sold. [source: report ERGP (12) 32, page 44]

NRAs were asked if they collect data on the number of postal establishments. All NRAs, with the exception of the UK, indicated that they do collect this information.

While the UK do not collect this information, it is published in Post Office Limited's Annual Network Report, so the indicator is publically available.

Table 36 – Do you collect information on the number of postal establishments?

Do you collect this indicator?	
Yes	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, NO, PL, PT, RO, RS, SE, SK, SI
No	UK

For those NRAs that collect information on the number of postal establishments, the sources of these are set out in the Table below.

Twenty-six of the 32 of the NRAs collect this indicator directly. Germany is in two categories in the table below, as it states that in addition to collecting information directly, it also sources this indicator from reports by the incumbent.

Three out of the 33 countries collect this indicator by means other than those specified in the survey. In the case of Greece this was 'USP SP report to NRA. Courier data through EETT register. All establishments posted in providers' sites.' Hungary collects it through 'Data supply of the SPs by law.' The Netherlands collected it through 'Information provided by the USP'.

The remaining 4 countries that collect this indicator do so through public reports and accounts of the postal service provider.

[75] ACC 202: (post) Offices open to the public and Postal agencies (source: Eurostat).

Table 37: The source of information on the number of postal establishments

	Directly by the NRA (e.g. questionnaires developed by NRA);	Public reports and accounts of the postal service providers;	Other
AT	✓		
BE		✓	✓ (From USP annual report but also from USP report to NRA)
BG	✓		
CH	✓		
CY	✓		
CZ	✓		
DE	✓	✓	
DK	✓		
EE	✓		
EL			✓(USP report to NRA. Courier data through EETT register. All establishments posted in providers' sites)
ES	✓		
FI	✓		
FR	✓		
FY	✓		
HR	✓		
HU			✓ (Data supply of the SPs by law.)
IE	✓	✓	✓ (From USP annual report but also from USP report to NRA)
IS	✓		
IT	✓		
LT	✓		
LU		✓	
LV	✓		
MT	✓		
NL			✓(Information provided by the USP)
NO		✓	
PL	✓		
PT	✓		
RO	✓		
RS	✓	✓	
SE	✓		
SI	✓		
SK	✓		

Note: includes only those countries that collect / calculate this indicator

The Table below shows the frequency of data collection, by source. Most NRAs collect this indicator annually (24 out of 33). Of this 24, seventeen collect it directly, 5 through public reports and accounts of the postal service providers and 3 through means other than

those specified on the survey (which is, Greece: USP report to NRA. Courier data through EETT register. All establishments posted in providers' sites. Hungary: Data supply of the SPs by law. The Netherlands: Information provided by the USP).

Two out of 33 countries do it bi-annually and they both source this indicator directly by the NRA. One country (Iceland) collects information on the number of postal establishments continuously. Four out of 33 do it quarterly, and all of these collect the data directly.

One of the 33 countries left this part blank as it does not apply to them (UK).

Table 38 - Frequency of collection of data on the number of postal establishments, by source and frequency

	Continuously	Quarterly	Bi-annually	Annually
Directly by the NRA (e.g. questionnaires developed by NRA);	IS	AT, HR, MT, PT	FY, LV	BG, CH, CY, CZ, DE, DK, EE, FI, FR, IT, LT, PL, RO, ES, SE, SK, SI
Public reports and accounts of the postal service providers;		IE		BE, DE*, LU, NO, RS
Other				BE (From USP annual report but also from USP report to NRA), EL (USP report to NRA. Courier data through EETT register. All establishments posted in providers' sites), HU (Data supply of the SPs by law), NL (Information provided by the USP)

**Stated as "reports by incumbent"*

NRAs were asked "Do you collect this data for the USP only or also for other operators?".

Twelve out of 33 NRAs collect this information for the USP only, whereas 10 collect it for both the USP and other postal operators and another 10 collect if for the USP, other postal services and courier express operators.

Germany and the UK left this section blank. Germany stated 'Incumbent and other operators.' Whereas this section didn't apply to UK as they don't use it as an indicator. In the Table below, Germany has been added to the USP, other postal operators and courier and express operators, but we note that there is no officially designated USP in Germany.

Table 39 - Who information on the number of postal establishments is collected from

	USP only	USP and other postal operators	USP, other postal operators and courier and express operators
AT		✓	
BE	✓		
BG			✓
CH			✓
CY		✓	
CZ		✓	
DE			✓
DK		✓	
EE			✓
EL			✓
ES	✓		
FI	✓		
FR	✓		
FY		✓	
HR		✓	
HU			✓
IE	✓		
IS	✓		
IT	✓		
LT	✓		
LU		✓	
LV		✓	
MT			✓
NL	✓		
NO	✓		
PL			✓
PT	✓		
RO			✓
RS			✓
SE	✓		
SI		✓	
SK		✓	

Note: includes only those countries that collect / calculate this indicator

Most NRAs (28 out of 33) use the definition of this indicator as set out in the 2012 ERGP report.

Three NRAs said that they do not. Lithuania's alternative definition was: 'Postal establishments shall mean a part of the postal network; the location where senders of postal items may deposit the items with the postal network, and the addressees may collect the same.' The Netherlands said 'we use the definition provided by the Postal Act as applied by the USP.' Portugal gave the response 'The definition used does not include delivery staff providing services similar to counter services.'

Two countries did not respond. (Finland and the UK). The UK left it blank due to them not using this indicator, whereas Finland uses this indicator and still left it blank.

Table 40 - Do you use the definition of this indicator as set out in the 2012 ERGP report?

Do you use the definition of this indicator as set out in the 2012 ERGP report?	
Yes	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LU, LV, MT, NO, PL, RO, RS, SE, SK, SI
No	LT, NL, PT

Note: the alternative definitions used by the NRAs responding "no" are set out in the text above this table

8.2 Postal coverage (number of postal establishments per 100 Km2)

NRAs were asked if they used postal coverage (the number of postal establishments per 100km^2) as an indicator. The majority of NRAs (23 out of 33) said that they did not. Ten NRAs do use this as an indicator.

Table 41 - Do you calculate/collect postal coverage?

Do you calculate/collect this indicator?	
Yes	BE, CY, FR, FY, HR, HU, IT, PL, PT, ES
No	AT, BG, CH, CZ, DE, DK, EE, EL, FI, IE, IS, LT, LU, LV, MT, NL, NO, RO, RS, SE, SK, SI, UK

Among those that calculate postal coverage, 5 source it directly, 1 from public reports and accounts of the postal service providers and 1 from reports/studies/market research, made by 3rd entities.

Two said they got this from sources other than those specified in the survey. Hungary got this from 'Data supply of the SPs by law' and Spain from 'internal calculation'. One NRA who answered yes to the previous question did not respond.

Table 42 - The source of information on postal coverage

	Directly by the NRA (e.g. questionnaires developed by NRA);	Public reports and accounts of the postal service providers;	Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA)	Other
BE			✓	
CY		✓		
ES				✓ (Internal calculation)
FY	✓			
HR	✓			
HU				✓ (Data supply of the SPs by law)
IS				
IT	✓			
PL	✓			
PT	✓			

Note: includes only those countries that collect / calculate this indicator

The following table shows the frequency of data collection, by source.

Table 43 - The frequency of collecting information on postal coverage, by source

	Quarterly	Bi-annually	Annually	Other
Directly by the NRA (e.g. questionnaires developed by NRA);	PT	FY	HR, IT	PL (only for net loss calculation)
Public reports and accounts of the postal service providers;		CY (semi-annually)		
Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA);			BE	
Other			ES (internal calculation)	HU (data supply of the SP's by law, coverage occasionally calculated when asked by questionnaire)

Of the 10 NRAs that collect this indicator, 2 collect this data for the USP and other postal postal operators, 5 for the USP only and 2 for the USP, other postal operators and courier and express operators, as set out below.

Out of 33 NRAs, 23 of them do not use this form of indicator. One NRA (France) does use this form of indicator and left this section blank.

Table 44 - Who information on postal coverage is collected from

	USP only	USP and other postal operators	USP, other postal operators and courier and express operators
BE	✓		
CY			✓
ES	✓		
FY		✓	
HR		✓	
HU			✓
IT	✓		
PL	✓		
PT	✓		

Note: includes only those countries that collect / calculate this indicator

When asked if they use the definition of this indicator as set out in the ERGP report, 8 said that they did. One NRA (Portugal) said they did not use the definition of this indicator as set out in the 2012 ERGP report as 'the definition used does not include delivery staff providing services similar to counter services.'

Table 45 - Do you use the definition of this indicator as set out in the 2012 ERGP report?

Do you use the definition of this indicator as set out in the 2012 ERGP report?	
Yes	BE, CY, FY, HR, HU, IT, PL, ES
No	PT

Note: the alternative definitions used by the NRAs responding "no" are set out in the text above this table

8.3 Postal density (Number of inhabitants / number of postal establishments)

NRAs were asked if they use postal density (number of postal establishments/number of inhabitants) as an indicator. The majority of NRAs (21 out of 33) said that they do not.

Thirteen NRAs do use this as an indicator.

Table 46 - Do you calculate/collect postal density?

Do you calculate/collect this indicator?	
Yes	BE, BG, FR, FY, HR, HU, IS, IT, LV, PL, PT, ES
No	AT, CH, CY, CZ, DE, DK, EE, EL, FI, IE, LT, LU, MT, NL, NO, RO, RS, SE, SK, SI, UK

Among those that calculate postal density, 8 NRAs source it directly, 1 also gets it from public reports and accounts of the postal providers, 1 source it from reports/studies/market research, made by 3rd entities and 2 from sources other than those specified in the survey. Twenty-one out of 32 countries left this section blank.

Table 47 - The source of information on postal density

	Directly by the NRA (e.g. questionnaires developed by NRA);	Public reports and accounts of the postal service providers;	Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA)	Other
BE	✓			
BG			✓	
ES				✓
FY	✓			
HR	✓			
HU				✓
IS	✓			
IT	✓			
PL	✓			
PT	✓			
RS	✓	✓		

Note: includes only those countries that collect / calculate this indicator

There are 7 NRAs that collect this data annually. Of these, 3 source it directly, 1 obtain it from public reports and accounts of the postal service providers, 1 from reports/studies/market research and 1 (SK) left the section about sources blank.

There are 2 NRAs that collect this indicator annually and get it from sources other than those specified in the questionnaire (Spain said they did it through 'Internal calculation', while Hungary said they sourced it from data supply of the SPs by law and national statistics about the territory of the country').

Latvia and FYROM collect this data bi-annually. Latvia sources its data directly and FYROM left the sources section blank.

Poland collects this data only for calculating the net cost of the USO; they sourced their information directly. Iceland also source this directly and collect it on a 'case by case basis'.

Portugal collect this data quarterly, and Bulgaria collect it as necessary.

Nineteen out of 33 countries left this section blank as they don't collect the data at all.

Table 48 - The frequency of collecting information on postal density, by source

	Quarterly	Bi-annually	Annually	Other
Directly by the NRA (e.g. questionnaires developed by NRA);	PT	LV	BE, HR, IT	PL (only for net cost calculation), IS (on a case by case basis)
Public reports and accounts of the postal service providers;			RS	
Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA);				BG (where necessary)
Other		FY (source not specified)	HU (data supply of the SPs by law and national statistics) ES (internal calculations) SK (source not specified)	

NRAs were asked which entities they collect postal density from. There are 4 NRAs that collect this data for the USP and other postal operators, 7 for the USP only, and 2 for the USP, other postal operations and courier and express operations.

Nineteen out of 32 countries left this section blank.

Table 49 - Who information on postal density is collected from

	USP only	USP and other postal operators	USP, other postal operators and courier and express operators
BE	✓		
BG	✓		
ES	✓		
FY		✓	
HR		✓	
HU			✓
IS	✓		
IT	✓		
LV		✓	
PL	✓		
PT	✓		
RS			✓
SI		✓	

Note: includes only those countries that collect / calculate this indicator

As with the other access point indicators, Portugal does not use the definition of this indicator as set out in the 2012 ERGP report, as 'the definition used does not include delivery staff providing services similar to counter services'. The remaining 11 NRAs that use this indicator do use the definition as set out in the 2012 ERGP report.

Table 50 - Do you use the definition of this indicator as set out in the 2012 ERGP report?

Do you use the definition of this indicator as set out in the 2012 ERGP report?	
Yes	BE, BG, FY, HR, HU, IS, IT, LV, PL, RS, ES
No	PT

Note: the alternative definitions used by the NRAs responding "no" are set out in the text above this table

8.4 Other indicators about access points

This section intends to inform about whether NRAs use other monitoring indicators regarding access points.

The NRA in Portugal collects a range of other indicators to monitor access points. These include, the number of access points (including letter boxes), information on the number of letter boxes, PO boxes, stamp selling points, automatic stamp dispensers, the number of vehicles and the proportion of the population at a specified distance to postal establishments.

8.5 Use of the indicators about access points

NRAs were asked what the collected, monitored or calculated information on the access points indicators are used for. The information can be summarized as follows (see table below):

Internal report

- 2 out of 32 countries said that what is collected, monitored or calculated information on the access points was not used for internal reports;
- 22 out of 32 countries said that they did use what is collected, monitored or calculated information on the access points for internal reports;
- 8 NRAs left this section blank.

Public reports (updates / annual reports)

- 3 out of 32 countries said that what is collected, monitored or calculated information on the access points was not used for public reports;
- 24 out of 32 countries said that they did use what is collected, monitored or calculated information on the access points for public reports;
- 5 out of 32 countries left this section blank.

For regulatory proposals / decisions

- 1 out of 32 countries said that what is the collected, monitored or calculated information on the access points is not used for regulatory proposals/decisions;
- 23 out of 32 countries said that what is collected, monitored or calculated information on the access points is used for regulatory proposals;
- 8 out of 32 countries left this section blank.

For possible investigations

- 1 out of 32 countries said that what is collected, monitored or calculated information on the access points is not used for possible investigations;

- 20 out of 32 countries said that what is collected, monitored or calculated information on the access points is used for possible investigations;
- 11 out of 32 countries left this section blank.

Table 51 - Access Points: Use

	Internal reports	**Public reports (updates / annual reports)**	**For regulatory proposals / decisions**	**For possible investigations**
AT	Yes	No	Yes	Yes
BE	Yes	Yes	Yes	Yes
BG		Yes	Yes	
CH	Yes	Yes	Yes	Yes
CZ	Yes	Yes	Yes	Yes
DE	Yes	Yes	Yes	Yes
DK	No	Yes	Yes	Yes
EE		Yes		
EL	No	Yes	Yes	Yes
FI	Yes	Yes	Yes	
FR	Yes	Yes	Yes	Yes
FY		Yes		
HR	Yes	Yes	Yes	No
HU	Yes	Yes	Yes	Yes
IE	Yes	No	Yes	Yes
IS	Yes	No	Yes	Yes
IT	Yes	Yes	Yes	Yes
LT	Yes	Yes	Yes	Yes
LV	Yes	Yes	Yes	Yes
MT	Yes	Yes	Yes	Yes
NL		Yes		
PL	Yes	Yes	Yes	Yes
PT	Yes	Yes	Yes	Yes
RO	Yes	Yes	Yes	Yes
ES	Yes	Yes	Yes	
SE	Yes	Yes	No	Yes
SK	Yes			
SI	Yes	Yes	Yes	Yes
Summary of responses				
Total "yes"	**22**	**24**	**23**	**20**

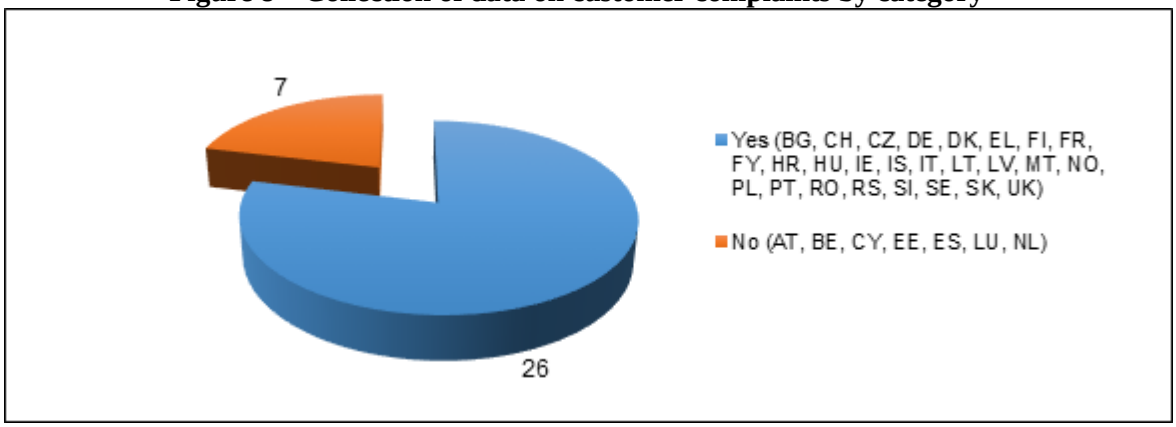
9. Customer satisfaction

9.1 Number of customer complaints by category and as a percentage of the (correspondent) real mail volume

This chapter looks at how NRAs are collecting data on customer complaints[76,77] about postal services.

The vast majority of NRAs (26) collect data on customer complaints by category. Only 7 NRAs indicated not to collect this data, none of which is planning to start doing it in the next two years.

Figure 8 – Collection of data on customer complaints by category [78]



Source: ERGP (33 NRAs)
Question: Do you collect the number of customer complaints by category?

Fewer NRAs collect data on customer complaints as a percentage of the (corresponding) mail volume, as only 13 indicated to do so. Most NRAs (18) do not collect this data or plan to starting doing it in the next two years.

[76] Complaint is an expression of dissatisfaction made to an organisation, related to the perceived failure of its products, services or policies, or the complaint handling process itself, where a response or resolution is explicitly or implicitly expected (EN 14012:2008 – Postal Services – Quality of Service – Complaints handling principles).

[77] In this report "customer" is used in a broader sense, meaning that it can refer both to users and to customers.

[78] NRAs' notes:

DE: Only data (complaints) received by the NRA.

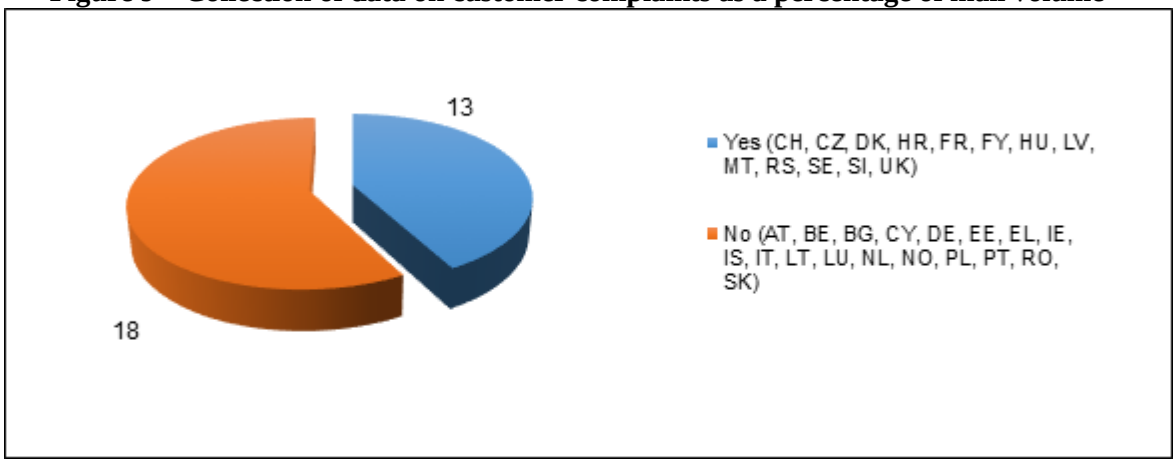
IE: Reported by USP in disaggregated form in its Annual Report. We monitor this number.

FI: Partly.

SI: By category we mean the number of complaints by reason for complaints.

SK: We collect the number of complaints, but not by category. Except this data collection, NRA receives customer complaints on handling of complaint by postal operators.

Figure 9 – Collection of data on customer complaints as a percentage of mail volume [79]

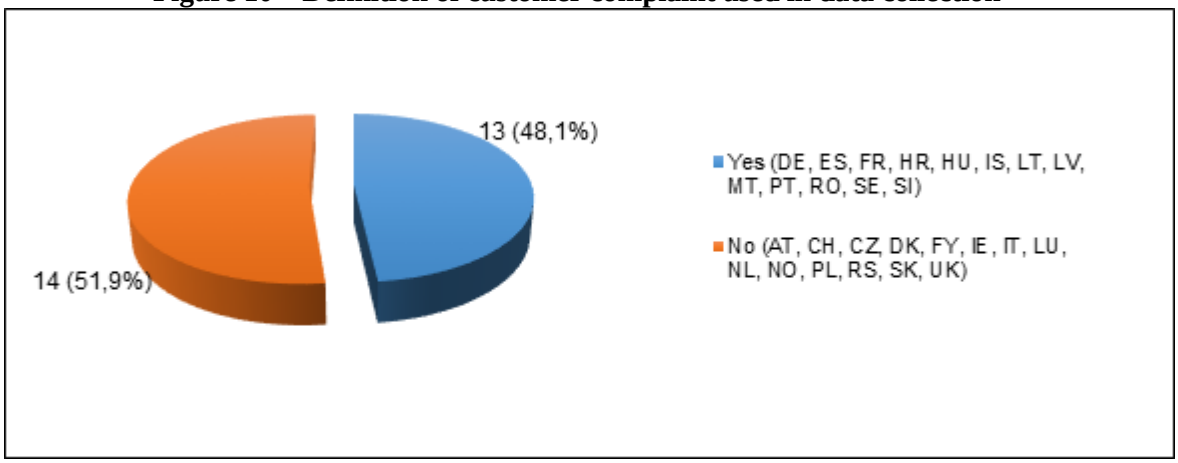


Source: ERGP (31 NRAs)
Question: Do you collect the number of customer complaints by category, as a percentage of the real mail volume?

Turning to the definition of complaint used by NRAs in the collection of data about customer complaints, specifically if they use the definition of the CEN Standard EN 14012:2008, most NRAs indicated not to use it (14). Nevertheless, 13 respondent NRAs colect data on customer complaints using the definition from the CEN Standard.

[79] NRAs' notes:
IE: Reported by USP in disaggregated form in its Annual Report. We monitor this number.
SK: If necessary we calculate it (we know the mail volume). Complaints received by NRA are registered according to categorisation indicated on the CEN standard.

Figure 10 – Definition of customer complaint used in data collection [80]

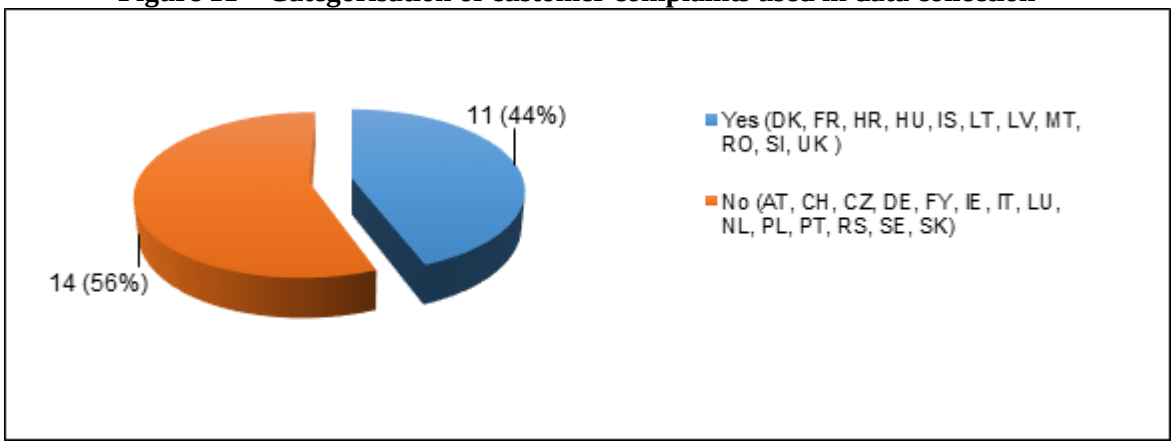


Source: ERGP (27 NRAs)
Question: Do you use the definition of complaint indicated on the CEN Standard EN 14012:2008?

NRAs were also asked if they used the categorisation from the CEN Standard EN 14012:2008 on the data collected about customer complaints regarding postal services. As was the case with the definition of complaint, most NRAs (14) indicated not to follow this categorisation. Still, 11 respondent NRAs use the categorisation of the CEN Standard in the data they collect on this matter.

[80] NRAs' notes:
CH: Partly.
ES: The USP declares to apply it on voluntary bases.
IE: The USP measures in accordance with 14012:2003.
IT: We use the definition provided by the law (ministerial decree n.261/99).
NO: System adapted to the EN 14012 Standard.
RS: CEN Standard EN 14012:2008 is not implemented, but USO has very similar procedure.
SI: Only compulsory for USP.
SK: Number of complaints relative only with lost, damaged items and theft of content.
UK: Please note that Ofcom are not a complaints body and our definition of complaints conforms the CEN standard, but our definition and use were implemented prior to the standard.

Figure 11 – Categorisation of customer complaints used in data collection [81]

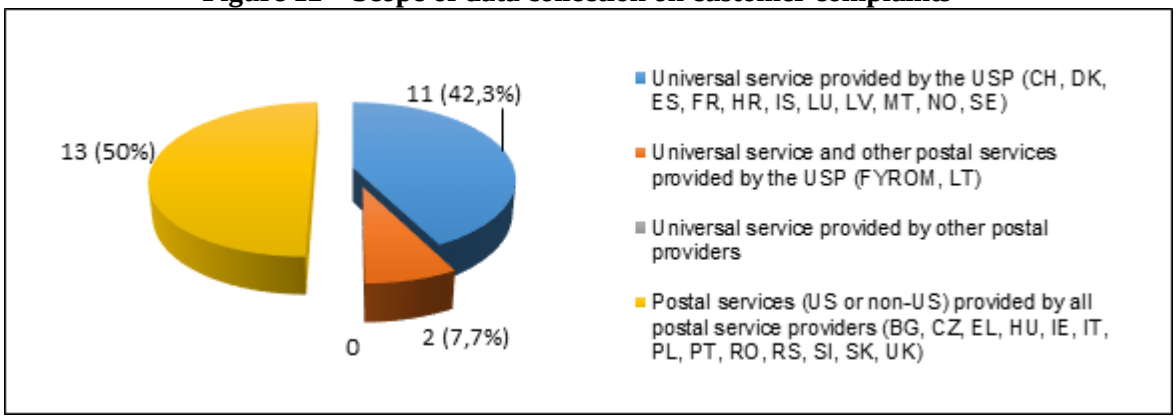


Source: ERGP (25 NRAs)
Question: Do you use the categorisation of complaints indicated on the CEN Standard EN 14012:2008 (Annex I)?

Regarding the scope of the information NRAs are collecting on customer complaints, the majority collects complaints about postal services (universal service and non-universal service) provided by all postal services providers, which was indicated by 13 NRAs, following complaints about universal postal service provided by the USP indicated by 11 NRAs. Only 2 NRAs collect data on universal postal service and other postal services provided by the USP and none collect data on universal service provided by other postal service providers.

[81] NRAs' notes:
CH: Partly.
IE: The USP measures in accordance with 14012:2003.
IT: We use the definition provided by the law (ministerial decree n.261/99).
PT: Most of the categories used are the same, but some (for example "Access to customer service information", "Behaviour and competence of postal personnel" and "How complaints are treated") are not individualized.
SE: Regulator and USP have agreed on definitions inspired by the standard, that both parties find useful.
SI: Only compulsory for USP.
SK: justified/non-justified; domestic/cross-border service.
UK: Please note that Ofcom are not a complaints body and while our categorisation of complaints broadly aligns with the EU standard, definition and use were implemented prior to the standard.

Figure 12 – Scope of data collection on customer complaints [82]

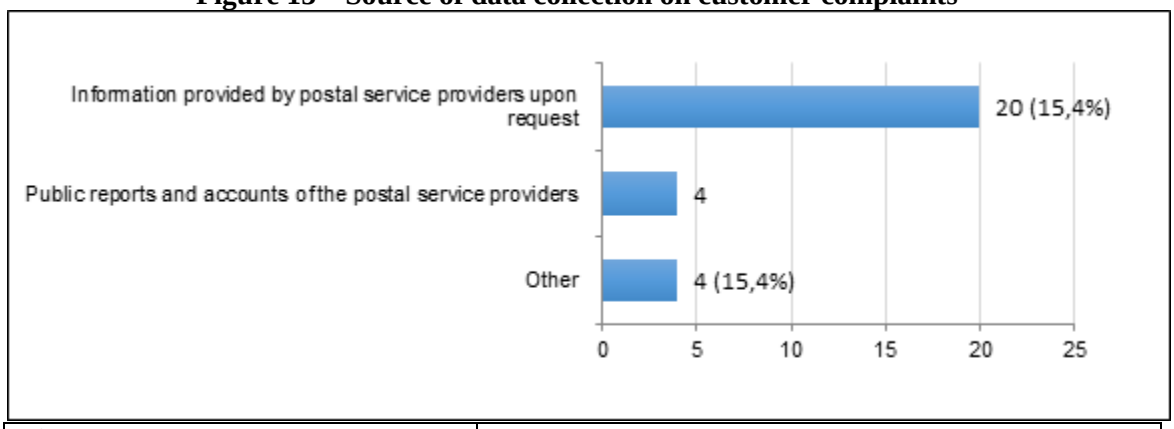


Source: ERGP (26 NRAs)
Question: What is the scope of the data collected?

The vast majority of NRAs use information provided by postal service providers upon request as a source for the data on customer complaints they collect, which was indicated by 20 NRAs. Fewer NRAs use other sources, like public reports and accounts, mentioned by 4 NRAs, and other situations, mentioned also by 4 NRAs, which can be found detailed in NRAs notes below.

82 NRAs' notes:
LU: Other scope: Services inside the universal service area provided by postal operators other than the USP.

Figure 13 – Source of data collection on customer complaints [83]



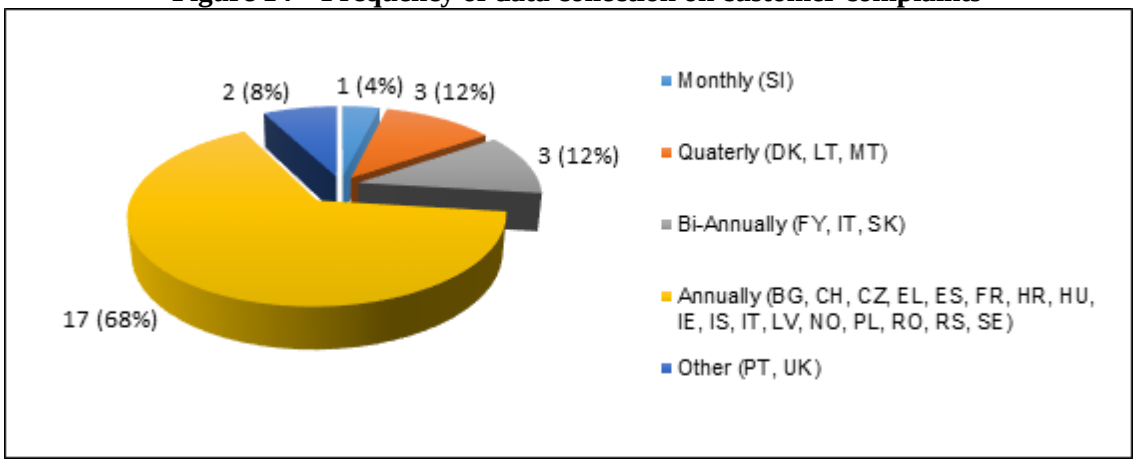
Information provided by postal service providers upon request	BG, CH, CZ, DK, EL, ES, FR, FYROM, HR, IS, IT, LT, LU, MT, NO, RO, RS, SE, SI, SK
Public reports and accounts of the postal service providers	IE, IT, LV, RS
Other	HU, PL, PT, UK

Source: ERGP (26 NRAs)
Question: What data source(s) do you use?

Also, the vast majority of NRAs collect data on customer complaints annually, what was mentioned by 17 NRAs. Fewer NRAs collect this data with a different frequency, monthly (1), quarterly (3) or bi-annually (3).

[83] NRAs' notes:
EL: USP complaints through report to NRA and courier data through questionnaire.
IT: USP has to provide (by law) data on complaints in US services every 6 months.
HU: Data supply of the SPs by law.
PT: 1-Complaints collected directly by ANACOM. 2- Data reported quarterly by the USP to the NRA on the number of complaints about universal services, total and by category.
UK: We use published accounts from the USP, complaints directly to Ofcom and also complaints information from third parties.

Figure 14 – Frequency of data collection on customer complaints [84]



Source: ERGP (25 NRAs)
Question: How frequently do you collect this data?

9.2 Customer satisfaction index

Only 14 NRAs stated that they monitor customer satisfaction indices. In seven of these countries (BE, FI, MK, MT, NO, SE, SK), the indicator's scope comprises only universal services provided by the USP, while in the other ones, also services outside the US-scope provided by the USP and other postal service providers are taken into account.

Table 52 - Table xx- NRAs monitoring indices of customer satisfaction

Question	Answer	Count	Country	%
Do you monitor indices of customer satisfaction in your country?	Yes	14	BE, CY, FI, IE, EL, LT, LU, MK, MT, PT, RS, SE, SK, UK	42%
	No	19	AT, BG, CH, CZ, DE, DK, EE, ES, FR, HR, HU, IS, IT,, LV, NL, NO, PL, RO, SI	58%

The sources of the data used for the customer satisfaction indices are mainly surveys conducted by the NRA itself or by a third entity. Three NRAs stated that they obtain the data from the respective USPs.

[84] NRAs' notes:
PT: 1-Complaints collected directly by ANACOM: continuously. 2-Data reported quarterly by the USP: quarterly.
SI: USP on monthly basis, other postal service providers' data on annual basis.
UK: USP data is annual, complaints to the NRA are continuous and third party information is provided on request, as required.

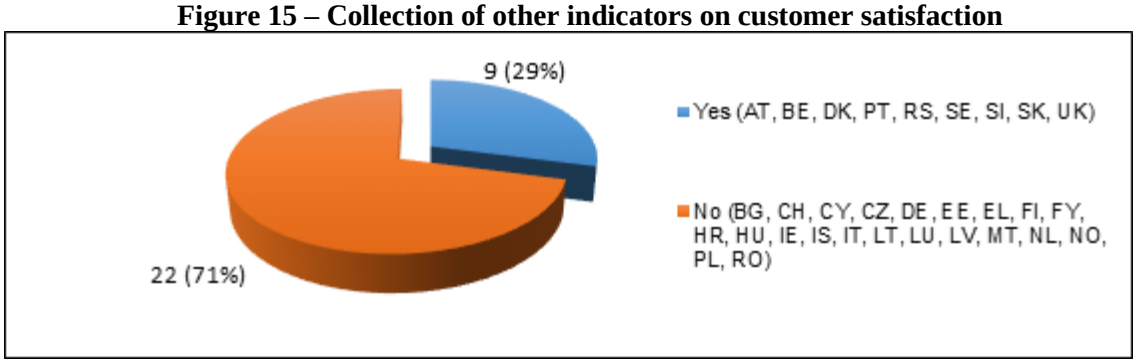
The frequency in which the data are collected varies. It reaches from irregular intervals determined by the NRA to bi-annual data collection. In UK a continuous tracking survey is run, that reports quarterly and annually and is able to be analysed at a monthly level.

9.3 Other indicators about customer satisfaction

This chapter shows if NRAs are using other indicators to monitor customer satisfaction.

Only one third of the respondent NRAs mentioned to use other indicators to monitor customer satisfaction. These indicators vary significantly from country to country.

Figure 15 – Collection of other indicators on customer satisfaction



Source: ERGP (31 NRAs)
Question: Do you collect, monitor or calculate other indicators to measure customer satisfaction?

Nine NRAs identified other indicators used to monitor customer satisfaction. The table below lists the different indicators used per country.

Table 53 – Other indicators to measure customer satisfaction

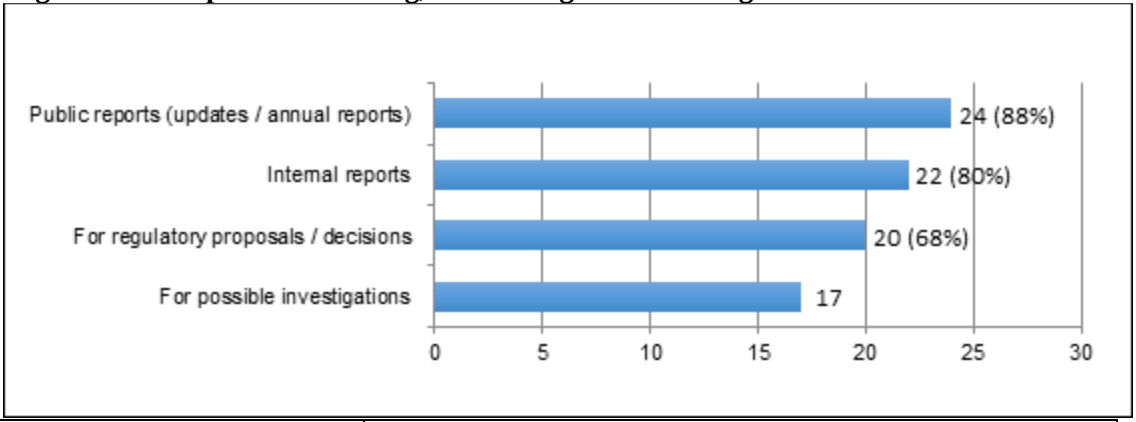
	Other indicators to measure customer satisfaction
AT	USP: total number of complaints (annually).
BE	Surveys regarding customer needs (households and businesses) based on phone surveys to measure the needs of consumers with regard to the USP and more specifically to the frequency of delivery, their postman, services provided in access points, etc. These surveys are divided into two categories of customers: households and businesses.
DK	WIK study.
PT	Number of customer inquiries received by the USP regarding universal services.
SE	Measure of value of service in relation to price
SI	The Agency conducts research on user satisfaction (general and business public) with postal services with the assistance of an external contractor. The primary objective of this research is to establish the scope of the use of postal services, satisfaction with the quality of postal services, user awareness of postal service providers and comparison of data from the previous research.
SK	Satisfaction with opening hours; Time of waiting at the counter; Accesibility of information; Price appropriateness
UK	We ask about a number of different elements of postal service satisfaction among consumer and business users in two continuous tracking surveys. These include a diverse range of questions, including satisfaction with the time post is delivered, proximity of access points, overall satisfaction and many others. We also ask whether people have had cause to complain and what the outcome of their complaint was.

9.4 Use of the indicators about customer satisfaction

This chapter focus on what NRAs are doing with the information on customer complaints that is collected, monitored or calculated.

Data collection on customer complaints seems to be primarily aimed at public reports, which was indicated by 24 NRAs, followed by internal reports, mentioned by 22 NRAS, regulatory proposals or decisions, indicated by 19 NRAs, and possible investigation, refered by 17 NRAs. Most NRAs indicated all four purposes for the data collection on this matter.

Figure 16 – Purpose of collecting, monitoring or calculating data on customer satisfaction



Public reports (updates / annual reports)	BE, BG, CZ, DE, DK, EL, ES, HR, FI, FR, FYROM, HU, IE, LT, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK
Internal reports	BE, CZ, DE, DK, EL, ES, FI, FR, HU, IE, IS, LT, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK
For regulatory proposals / decisions	BE, BG, CZ, DK, EL, ES, HR, FR, HU, IE, IS, LT, LU, LV, MT, PT, RO, RS, SI, UK
For possible investigations	BE, BG, CZ, DK, EL, HU, IE, IS, LT, LV, MT, PT, RO, SE, SI, SK, UK

Source: ERGP (26 NRAs)
Question: What is the collected, monitored or calculated information on customer satisfaction used for?

10. Employment

10.1 Number of persons employed in the postal sector

Employment in the postal sector refers to people employed in postal services within the economic territory of the country of reference. It also includes part-time workers, who are regarded as such under the laws of the country concerned and who are on the pay-roll, as well as seasonal workers, apprentices and home workers on the pay-roll. It is measured as

an average over the reference year. It corresponds to the definition adopted by Eurostat (EMPL 106). [source: report ERGP (12) 32, page 49]

NRAs were asked if they used the number of people employed in the postal sector as an indicator. The majority of NRAs (30 out of 33) said that they did.

There are 3 NRAs (Netherlands, Norway and Sweden) that do not collect this indicator.

Table 54 - Do you collect the number of people employed in the postal sector?

Do you collect this indicator?	
Yes	AT, BE, BG, CH, CY, CZ, DE, DK, EE, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, PL, PT, RO, RS, SK, SI, UK
No	NL, NO, SE

Among those that collect employment information, 24 NRAs source it directly, 3 get it from public reports and accounts of the postal providers, and 3 from sources other than those specified in the survey (Table 55). For Cyprus this meant: ‘Questionnaires’. Greece: Questionnaires and USP annual report. Hungary: Data supply of these PSPs by law.

Table 55 - The source of information on postal sector employment

	Directly by the NRA (e.g. questionnaires developed by NRA);	Public reports and accounts of the postal service providers;	Other
AT	✓		
BE		✓	
BG	✓		
CH	✓		
CY			✓ (Questionnaires)
CZ	✓		
DE	✓		
DK	✓		
EE	✓		
EL			✓(Questionnaires and USP annual report)
FI	✓		
ES	✓		
FR	✓		
FY	✓		
HR	✓		
HU			✓(Data supply of the PSPs by law)
IE		✓(reported as FTE)	
IS	✓		
IT	✓		
LT	✓		
LU	✓		
LV	✓		
MT	✓		
PL	✓		
PT	✓		
RO	✓		
RS		✓	
SI	✓		
SK	✓		
UK	✓		

Note: includes only those countries that collect / calculate this indicator

There are 21 NRAs that collect this data annually, 16 of which source their information directly. Out of these 21, three obtain their information through public reports and accounts of the postal service, 2 receive their data through 'other' (Greece: Questionnaires and USP annual report. Hungary: Data supply of these PSPs by law.)

There are 4 NRAs that collect their data bi-annually. Three of them source their information directly by the NRA and one of them sources it from other which has been stated as 'Questionnaires'.

One NRA (UK) collects their data 'monthly, quarterly and annually'.

Three NRAs collect this data quarterly, all of which source their information directly.

Table 56 - The frequency of collecting information on postal employment, by source

	Quarterly	Bi-annually	Annually	Other
Directly by the NRA (e.g. questionnaires developed by NRA);	AT, HR, MT	FY, IS, LV	BG, CH, DE, DK, EE, FR, IT, LT, LU, PL, PT, RO, ES, SK, SI, CZ	UK (we get this information monthly, quarterly and annually)
Public reports and accounts of the postal service providers;			BE, IE, RS	
Other		CY (semi-annually) (source: Questionnaires)	EL (Questionnaires and USP annual report), HU (data supply of the PSPs by law)	

NRAs were asked “Do you collect this data for the USP only or also for other operators?”. Three collect this data for the USP only, 15 for the USP and postal operators and 11 for the USP, other postal operators and courier and express operators.

Table 57 - Which organisations information on postal employment is collected from

	USP only	USP and other postal operators	USP, other postal operators and courier and express operators
AT		✓	
BE		✓	
BG			✓
CH			✓
CY		✓	
CZ		✓	
DE		✓	
DK		✓	
EE			✓
EL			✓
ES		✓	
FI		✓	
FR		✓	
FY		✓	
HR		✓	
HU			✓
IE	✓		
IS	✓		
IT			✓
LT		✓	
LV			✓
MT			✓
PL			✓
PT		✓	
RO			✓
RS			✓
SI		✓	
SK		✓	
UK	✓		

Note: includes only those countries that collect / calculate this indicator

Five NRAs said that they do not use the definition of this indicator as set in the 2012 ERGP report and 23 said they do.

Table 58 - Do you use the definition of this indicator as set out in the 2012 ERGP report?

Do you use the definition of this indicator as set out in the 2012 ERGP report?	
Yes	BE, BG, CH, CY, DK, EE, EL, FR, FY, HR, HU, IS, IT, LU, LV, MT, PT, RO, RS, ES, SK, SI, CZ
No	AT, IE, LT, PL, UK

Not specified: FI.

10.2 Other indicators about employment

This section informs about whether NRAs use other monitoring indicators regarding employment.

Portugal also collects information on the average annual number of employees and the number of postal employees at the end of the year.

10.3 Use of the indicators about employment

Table 59 - Employment Indicators: use

	Internal reports	Public reports (updates / annual reports)	For regulatory proposals / decisions	For possible investigations
AT	Yes	Yes	Yes	Yes
BE	Yes	Yes	Yes	Yes
BG		Yes		Yes
CH	Yes	Yes	Yes	Yes
CY	Yes	Yes	Yes	Yes
CZ	Yes	Yes	Yes	Yes
DE	Yes	Yes	Yes	Yes
DK	No	Yes	Yes	No
EE		Yes		
EL	No	Yes	No	Yes
FI	Yes			
FR		Yes		
FY		Yes		
HR	No	Yes	No	No
HU	Yes	Yes	Yes	Yes
IE	Yes	No	No	No
IS	Yes	No	Yes	No
IT	Yes	Yes	Yes	Yes
LT	No	Yes	No	No
LU	No	No	No	No
LV	Yes	Yes	Yes	Yes
MT	Yes	Yes	Yes	Yes
PL	Yes	Yes	No	No
PT	Yes	Yes	Yes	Yes
RO	Yes	Yes	Yes	Yes
RS	Yes	Yes	Yes	
ES	Yes	Yes	Yes	
SE	No	No	No	No
SK	Yes			
SI	Yes	Yes	No	No
UK	Yes	Yes	Yes	Yes
Total "Yes"	**21**	**25**	**17**	**15**

The information in table above can be summarized as follows:

Internal report

- 5 out of 32 countries said that what is collected, monitored or calculated information on employment indicators was not used for internal reports;
- 21 out of 32 countries said that they did use what is collected, monitored or calculated information on employment indicators for internal reports;
- 6 out of 32 countries left this section blank.

Public reports (updates / annual reports)

- 4 out of 32 countries said that what is collected, monitored or calculated information on the employment indicators was not used for public reports;
- 25 out of 32 countries said that they did use what is collected, monitored or calculated information on the employment indicators for public reports;
- 3 out of 32 left this section blank.

For regulatory proposals / decisions

- 8 out of 32 countries said that what is the collected, monitored or calculated information on the employment indicators is not used for regulatory proposals/decisions;
- 17 out of 32 countries said that what is collected, monitored or calculated information on the employment indicators is used to report proposals;
- 7 out of 32 countries left this section blank.

For possible investigations

- 9 out of 32 countries said that what is collected, monitored or calculated information on the employment indicators is not used for possible investigations;
- 15 out of 32 countries said that what is collected, monitored or calculated information on the employment indicators is used for possible investigations;
- 8 out of 32 countries left this section blank.

11. Investment

11.1 Investment in the postal sector

The investment in the postal segment corresponds to the total amount of investment used for postal activities. It includes investment, in technical costs, on tangible and intangible fixed assets. These values concern only the investment of the provider on the postal service function.

Based on responses provided by 33 countries data, 13 countries collect this indicator while 18 countries do not. There are 2 countries (Croatia and Greece) that intent to collect this indicator in the next 2 years. From those countries that are collecting this indicator, 8 countries get the information directly from the NRA and the majority of countries (6 out of 8 countries) do so on an annual basis. The other 5 countries (BE, CY, HU, IE, RS) collect this indicators via other channels such as reports, studies and market research. In particular, Hungary is collecting this from the postal service providers according to law on an annual basis.

With the exception of Finland and Ireland who collect this data only for the USP, all other countries collect the investment indicator also for other postal operators. The majority of the countries collect this data on an annual basis while there are some that do this much often.

Table 60 - Countries that collect postal investment data

	Do you collect this indicator?	What is the source of this indicator?	How frequently do you collect this data?	Do you collect this data for the USP only or also for other operators?	Do you use the definition of this indicator as set out in the 2012 ERGP report?
AUSTRIA	Yes	Directly by the NRA	Quarterly	USP and other postal operators	Yes
BULGARIA			Annually	USP, other postal operators and courier and express operators	Yes
CZECH REPUBLIC				USP and other postal operators	Yes
FINLAND				USP only	
FRANCE				USP and other postal operators	Yes
ITALY				USP, other postal operators and courier and express operators	Yes
PORTUGAL				USP and other postal operators	Yes
SLOVAKIA			Bi-annualy	USP and other postal operators	Yes
BELGIUM	Yes	Reports/studies/market research, made by 3rd entities (commissioned or not by the NRA);	Annually	USP and other postal operators	Yes
CYPRUS	Yes	Other (questionnaires)	Bi-annualy	USP, other postal operators and courier and express operators	Yes
HUNGARY	Yes	Data supply of the PSPs by law	Annually	USP, other postal operators and courier and express operators	Yes
IRELAND	Yes	Public reports and accounts of the postal service providers;	Annually	USP only	Yes
SERBIA	Yes	Public reports and accounts of the postal service providers;	Annually	USP, other postal operators and courier and express operators	Yes

11.2 Other indicators about investment

Portugal and Slovenia are the only countries that collect extra data on investment. More specifically, Portugal obtains data for the total annual investment of each postal service company. Slovenia though does not collect primarily investment data as described above

(i.e. investment, in technical costs, on tangible and intangible fixed assets, etc.) in that country the USP has the obligation to prepare and sent to the NRA an annual postal network maintenance plan for each coming year.

11.3 Use of the indicators about investment

Regarding the usage of the collected data on postal investment, this differs among countries. It should be highlighted that 6 countries (AT, BE, CY, CZ, HU and PT) are fully exploiting the possible usage channels as indicated in the following table. The rest of the countries are using these data to a lesser extent.

Table 61 - Use of investment data

	Internal reports	Public reports (updates / annual reports)	For regulatory proposals / decisions	For possible investigations
AUSTRIA	✓	✓	✓	✓
BELGIUM	✓	✓	✓	✓
BULGARIA		✓	✓	✓
CYPRUS	✓	✓	✓	✓
CZECH REPUBLIC	✓	✓	✓	✓
FINLAND	✓	✓	✓	
FRANCE		✓		
HUNGARY	✓	✓	✓	✓
IRELAND	✓		✓	
ITALY	✓	✓	✓	
PORTUGAL	✓	✓	✓	✓
SERBIA	✓	✓	✓	
SLOVAKIA	✓			
SLOVENIA	✓		✓	✓

12. Additional monitoring indicators

This Chapter is the result of the analysis of the answers from NRAs concerning the collection and monitoring by NRAs of the following additional indicators: digital postal services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce. These are indicators that NRAs can also take into account when preparing regulatory Decisions on the postal services market. The

Preamble of the Directive provides a set of facts which reflect the needs that led to the regulation of postal services on the European Union territory.

Additionally, in accordance with Recital 14 of Directive 2008/6/EC - "*There are a number of drivers of change within the postal sector, notably demand and changing user needs, organisational change, automation and the introduction of new technologies, substitution by electronic means of communication and the opening of the market. In order to meet competition, cope with new consumer requirements and secure new sources of funding,* ***postal service providers may diversify their activities by providing electronic business services or other information society services***".

In accordance with Recital 15 - "*Postal service providers, including the designated universal service providers, are being spurred on to improve efficiency as a result of new competitive challenges (such as* ***digitalisation and electronic communications****) which differ from the traditional postal services and this will in itself contribute to a major increase in competitiveness*".

In accordance with Recital: 22 - "*The provision of high-quality postal services contributes significantly to attaining the objective of social and territorial cohesion.* ***E-commerce, in particular****, offers new opportunities for remote and sparsely populated areas to participate in economic life for which the provision of good postal services is an important precondition*".

Bearing in mind the fact that every NRA has, proportionate to the performance of its tasks, the power and the freedom to choose the indicators it monitors within the process of regulation of the national postal markets, the questionnaire on the monitored indicators sent out to the NRAs included the following "additional" indicators which entail the development of certain postal or related services that involve in the processing of the postal items at least one segment of the technological flow running on electronic basis.

12.1 Definitions

Within the meaning of the questionnaire on the implementation of additional indicators were taken into account the following definitions:

1. Digital mail - Digital-to-digital format of mail delivery[85].

2. Hybrid mail – refers to items that are dispatched in electronic form by the sender and are subsequently printed and delivered in physical form to the addressee[86].

3. Reversed Hybrid mail - refers to items that are dispatched in physical form by the sender and are subsequently converted into an electronic form that is processed and delivered electronically to the addressee[87].

4. Document management - scanning and archiving services for organizations[88].

5. E-billing/E-invoicing - sending or making available an invoice and its subsequent processing and storage, wholly by electronic means[89].

6. E-commerce dimension 1 = the role played by postal operators in the final leg of an e-commerce transaction: shipping of items delivered on-line[90].

7. E-commerce dimension 2 = the supply of e-commerce services other than postal services by the postal operators (such as electronic banking or e-shops)[91].

12.2 Power to collect data

The answers received show the following (see table below):

a) The NRAs with powers to collect the **Digital Mail** indicator are from Cyprus, Italy, Malta and Spain;

b) The NRAs with powers to collect the **Hybrid Mail** indicator are from Belgium, Bulgaria, Cyprus, Finland, France, FYROM, Germany, Greece, Italy, Latvia, Malta, Netherlands, Poland, Romania, Slovakia, Spain, Sweden and UK;

[85] ERGP, adapted from "Achieving High Performance in the Postal Industry", Accenture Research and Insights 2011.
[86] ERGP, adapted from "Main developments in the postal sector (2008-2010)", Copenhagen Economics.
[87] ERGP, adapted from "Measuring postal e-services development: an industry perspective", UPU, 2011.
[88] ERGP, adapted from "Achieving High Performance in the Postal Industry", Accenture Research and Insights 2011.
[89] ERGP, adapted from "Achieving High Performance in the Postal Industry", Accenture Research and Insights 2011.
[90] ERGP, adapted from "Main developments in the postal sector (2008-2010)", Copenhagen Economics.
[91] ERGP, adapted from "Main developments in the postal sector (2008-2010)", Copenhagen Economics.

c) The NRAs with powers to collect the **Reverse Hybrid Mail** indicator are from Belgium, Cyprus, Germany, Greece, Iceland, Italy, Latvia, Malta, and Spain;

d) The NRAs with powers to collect the **Document Management** indicator are from Cyprus, Iceland and Spain;

e) The NRA from Spain has powers to collect the **E-billing/E-invoicing** indicator;

f) The NRAs with powers to collect the **E-Commerce dimension 1** indicator are from Belgium, Bulgaria, Finland, Germany, Greece, Italy, Spain and the Netherlands;

g) The NRAs with powers to collect the **E-Commerce dimension 2** indicator are from Greece and Spain.

Table 62 – Power to collect data on additional indicators

	Digital Mail	Hybrid Mail	Reverse Hybrid Mail	Document Management	E-Billing E-invoicing	E-commerce 1	E-commerce 2
~~Austria~~	No	No	No	No	No	No	No
~~Belgium~~	No	Yes	Yes	No	No	Yes	No
~~Bulgaria~~	No	Yes	No	No	No	Yes	No
~~Croatia~~	No	No	No	No	No	No	No
~~Cyprus~~	Yes	Yes	Yes	Yes	No	No	No
~~Czech Rep.~~	No	No	No	No	No	No	No
~~Denmark~~	No	No	No	No	No	No	No
~~Estonia~~	No	No	No	No	No	No	No
~~Finland~~	No	Yes	No	No	No	Yes	No
~~France~~	No	Yes	No	No	No	No	No
~~FYROM~~	No	Yes	No	No	No	No	No
~~Germany~~	No	Yes	Yes	No	No	Yes	No
~~Greece~~	No	Yes	Yes	No	No	Yes	Yes
~~Hungary~~	No	No	No	No	No	No	No
~~Iceland~~	No	No	Yes	Yes	No	No	No
~~Italy~~	Yes	Yes	Yes	No	No	Yes	No
~~Latvia~~	No	Yes	Yes	No	No	No	No
~~Lithuania~~	No	No	No	No	No	No	No
~~Malta~~	Yes	Yes	Yes	No	No	No	No
~~Netherlands~~	No	Yes	No	No	No	Yes	No
~~Norway~~	No	No	No	No	No	No	No
~~Poland~~	No	Yes	No	No	No	No	No
~~Portugal~~	No	Yes*	Yes*	No	No	No	No
~~Romania~~	No	Yes	No	No	No	No	No
~~Serbia~~	No	No	No	No	No	No	No
~~Slovakia~~	No	Yes	No	No	No	No	No
~~Slovenia~~	No	No	No	No	No	No	No
~~Spain~~	Yes	Yes	Yes	Yes	Yes	Yes	Yes
~~Sweden~~	No	Yes	No	No	No	No	No
~~Switzerland~~	No	No	No	No	No	No	No
~~UK~~		Yes					

Notes: * PT – When the item is in a „phisycal“ form, it may be considered as postal item.

The results contained point to a clear majority of negative answers concerning whether NRAs have the power to request information from postal service providers about these services. A justification for this may be the fact that these are not considered as postal services, as results from the recitals of the Directive 2008/6/EC transcribed bove in this report.

In relation to the power to collect data regarding the additional indicators the single exceptional case is represented by the NRA from UK (OFCOM). OFCOM has the explicit power to collect only data regarding the **Hybrid Mail** indicator. Anywise, the UK legislation gives OFCOM the power to request such information as it considers necessary for the purpose of carrying out any of its functions in relation to postal services. If information on additional indicators became relevant to OFCOM's functions, then perhaps.

12.3 Collecting data on additional indicators

The answers we received show the following:

12.3.1. Digital Mail

The single three countries in which the NRAs have powers to collect data on the Digital Mail indicator are Cyprus, Italy, Malta and Spain, but not in even one of them the information we are talking about are collected.

12.3.2. Hybrid Mail

The feedback provided by the NRAs revealed that even if the vast majority of them have the power to monitor the Hybrid Mail indicator, these collections are made only by the NRAs from: Bulgaria, Germany, Greece, Netherlands, Poland, Romania, Slovakia and Sweden.

The frequency of collecting data on Hybrid Mail by the NRAs that confirmed that they monitor this additional indicator is in the vast majority of cases annually with the only exception of the NRA for Electronic Communication and Postal Services from Slovakia.

A special case is represented by OFCOM from UK, which does not monitor any data on Hybrid Mail indicator in a continuous way, at least “not explicitly”, but having information on delivered mail which includes also the delivered Hybrid Mail volumes.

All the information above are presented in the table below.

Table 63 – Collection of data – Hybrid mail

Indicator **Hybrid Mail**	**Power to collect**	**Effective Collection**	**Frequency of collection**
Belgium	**Yes**		
Bulgaria	**Yes**	**Yes**	**Annually**
Cyprus	**Yes**		
Finland	**Yes**		
France	**Yes**		
FYROM	**Yes**		
Germany	**Yes**	**Yes**	**Annually**
Greece	**Yes**	**Yes**	**Annually**
Italy	**Yes**		
Latvia	**Yes**		
Malta	**Yes**		
Netherlands	**Yes**	**Yes**	**Annually**
Poland	**Yes**	**Yes**	**Annually**
Romania	**Yes**	**Yes**	**Annually**
Slovakia	**Yes**	**Yes**	**Biannual**
Spain	**Yes**		
Sweden	**Yes**	**Yes**	**Annually**
UK	**Yes**		

12.3.3. Reverse Hybrid Mail

The feedback provided by the NRAs revealed that no NRA collects data on **Reverse Hybrid Mail**. The NRA of Greece plans to collect in the future.

Table 64 – Collection of data – Reverse Hybrid mail

Indicator **Reverse Hybrid Mail**	**Power to collect**	**Effective Collection**	**Frequency of collection**
Belgium	**Yes**	**No**	
Cyprus	**Yes**	**No**	
Germany	**Yes**	**No**	
Greece	**Yes**	**No, but planned for the future**	
Iceland	**Yes**	**No**	
Italy	**Yes**	**No**	
Latvia	**Yes**	**No**	
Malta	**Yes**	**No**	
Spain	**Yes**	**No**	

12.3.4. Document Management

The feedback provided by the NRAs revealed that only the NRAs from Cyprus, Iceland and Spain have powers to monitor the **Document Management** indicator, but not even one of them collect the information we are talking about.

12.3.5. E-Billing / E-invoicing

The feedback provided by the NRAs revealed no NRA collecting this indicator.

12.3.6. E-commerce - Dimension 1

The feedback provided by the NRAs revealed that only the NRA from Greece monitors the additional indicator **E-commerce - Dimension 1**.

Table 65 – Collection of data – E-commerce Dimension 1

Indicator **E-commerce - Dim. 1**	**Power to collect**	**Effective Collection**	**Frequency of collection**
Belgium	**Yes**	**No**	
Bulgaria	**Yes**	**No**	
Finland	**Yes**	**No**	
Germany	**Yes**	**No**	
Greece	**Yes**	**Yes**	**Annually**
Italy	**Yes**	**No**	
Spain	**Yes**	**No**	
Netherlands	**Yes**	**No**	

12.3.7. E-commerce - Dimension 2

The feedback provided by the NRAs revealed that only the NRA from Greece monitors the additional indicator **E-commerce - Dimension 2**.

13. Practices to preserve the confidentiality of data

The majority of the NRAs implement practices to preserve the confidentiality of data (see tables below). These involve the need for postal service providers when providing information to the NRA to inform what is confidencial, the publication by the NRA of aggregated data in order not to disclose individual data from one or two postal service providers.

Table 66 – Confidentiality: previous identification by the postal service provider

NRA	Practice: The postal services providers need to inform what is confidential when reporting information to the NRA
AT	No - All data are confidential unless stated otherwise by the PSP or if data are publicly available.
BE	Yes
BG	Yes
CH	No answer
CY	Yes
CZ	Yes
DE	No - Not for market observation purposes
DK	Yes
EE	Yes
EL	No
ES	No when answering to questionnaires as sensible data is already declared confidential by the CNMC. Yes when providing any other information.
FI	Yes
FR	Yes - Information sent by oip
FY	Yes
HR	Yes
HU	No
IE	ComReg's treatment of confidential information is published in ComReg document 05/24 ("Guidelines on the Treatment of Confidential Information") which is available from our website
IS	Yes
IT	Yes
LT	Yes - There is no obligation to inform what is confidential, however, according to the Rules for the Provision of the Postal Service, information from the received quarterly and annual reports on a particular postal service provider may be announced publicly, if, when providing information to the NRA on the provided postal service, there is no indication that it should not be publicly announced, or if this information is not deemed confidential under the Postal Law of the Republic of Lithuania, the Rules and other legal acts.
LU	Yes
LV	Yes
MT	Yes
NL	Yes
NO	Yes
PL	yes
PT	Yes
RO	No
RS	No
SE	Yes
SI	Yes
SK	No
UK	Yes

Table 67 – Confidentiality: publication of aggregated data

NRA	Practice: The NRA publishes aggregated market data only
AT	Yes
BE	No: data from the USP + aggregated data for other operators
BG	No - When the submitted data are explicitly declared confidential, the NRA publishes them aggregated; otherwise the real data are published
CH	Yes
CY	Yes
CZ	Yes
DE	Yes
DK	Yes
EE	Yes
EL	Yes - individual data are only presented in confidential reports
ES	Yes
FI	Yes
FR	Yes
FY	Yes
HR	Yes
HU	Yes
IE	ComReg's treatment of confidential information is published in ComReg document 05/24 ("Guidelines on the Treatment of Confidential Information") which is available from our website
IS	No
IT	Yes
LT	Yes
LU	No
LV	Yes
MT	Yes
NL	Yes - In as far as non aggregated data would be confidential. Aggregated data are not published if confidential information, retraceable to individual service providers, can be deduced from those data.
NO	No
PL	yes
PT	No
RO	Yes
RS	Yes
SE	No
SI	No - NRA can publish also separate data but only under the approval of postal service provider (if provided data are confidential the postal service provider has to mark them as such).
SK	Yes - All data collected by NRA are confidential. NRA can publish only aggregated data.
UK	Yes and no - where relevant and necessary for the fulfilling of its duties, Ofcom publishes specific provider information. However, Ofcom would need to prove that it is necessary and proportionate for the fulfilling of its duties to do so.

Table 68 – Confidentiality: sharing data with other entities

NRA	Practice: The NRA has restrictions on sharing data with other entities.
AT	Yes - Individual data may be only forwarded to the federal agency "Statistics Austria" for the purpose of federal statistics.
BE	Yes - confidential information cannot be shared with other entities
BG	No
CH	No answer
CY	No
CZ	Yes - Collected data can be used only for statistical purposes and international reporting in aggregated form and also for fulfillment of legal duties (market monitoring).
DE	Yes - Restrictions on sharing data of single postal operators
DK	No
EE	Yes - NRA shares confidential data only with Ministry, Statistics Estonia and European Commission or other institution allowed by law
EL	No - according to Greek postal law, all exchanged data is considered confidential
ES	Confidential information cannot be shared
FI	Yes
FR	Yes - Data provided on revenues and volumes are confidential and then cannot be published in isolation
FY	No
HR	Yes - The NRA provided data to other entities only as a aggregated market data rather than individually
HU	Yes - Data protection law.
IE	ComReg's treatment of confidential information is published in ComReg document 05/24 ("Guidelines on the Treatment of Confidential Information") which is available from our website
IS	Yes - Confidential information is not shared
IT	Yes – to be evaluated on a case by case basis
LT	Yes - NRA shall ensure the confidentiality of confidential information.
LU	Yes - Article 38 of the Postal Services Act of 26 December 2012 (1) The Institute is authorized to publicly disclose all information that would contribute to an open and competitive market, subject to the rules on commercial confidentiality. (2) If the Institute transmits to the European Commission or an NRA of another Member State information provided at the Institute's request by a company, this company shall be informed. To the extent necessary, and unless the Institute has made an explicit and reasoned request to the contrary, the Commission shall make the information provided available to another NRA in another Member State, subject to the same degree of confidentiality as initially assigned to this information. (3) The Institute is authorised to transmit information, including confidential information, gathered under the Postal Services Act, to the authority responsible for applying competition law.
LV	No
MT	No - There are no formal restrictions but we are bound by confidentiality. Hence any data request which is not publically available requires clearance to supply info
NL	Yes - Information acquired by the NRA in the performance of a legal task can only be used or shared within the NRA if this is necessary for performing said task or another legal task. Sharing information with other entities is subject to legal constraints.
NO	Yes - The cost accounting is exempt from public
PL	yes
PT	Yes - See http://www.anacom.pt/render.jsp?contentId=1116771&languageId=1 (determination of the NRA by which it orders companies that provide postal services to always indicate the information they consider confidential whenever they provide it to the regulator).
RO	No answer
RS	Yes
SE	Yes - With respect to business confidentiality, business confidential data cannot be shared with a third party.
SI	Yes - According to the Postal Service Act, the Agency shall publish reports on the situation in areas falling within its competence, including statistical, financial and other data provided by organisations involved in these areas; in doing so, it shall be legally liable to protect business confidentiality and other sensitive business data.
SK	No
UK	Yes - There are a number of legal restrictions - The Offical Statistics Act requires the timely publication of data deemed to be Official Statistics and prevents sharing of the data prior to that and The Postal Services Act 2011 prevents the publication or provision of information that relates to a third party unless certain conditions are met.

Table 69 – Confidentiality: other practices

NRA	There are other rules in place / defined.
AT	Yes - There are general rules on the handling of trade secrets.
BG	No
CZ	No
DK	No
EL	Yes - EETT cooperates with other public entities according to Greek postal law
FY	No
HU	No
IE	ComReg's treatment of confidential information is published in ComReg document 05/24 ("Guidelines on the Treatment of Confidential Information") which is available from our website
IS	No
IT	AGCOM's regulation on third parties access to files
LT	No
LV	No
MT	No
NL	Yes - The Act on public disclosure of information may also have some relevance in this context.
NO	No
PL	No
PT	Yes - See http://www.anacom.pt/render.jsp?contentId=1116007
RO	No
RS	No
SI	No
SK	No
UK	Yes

14. Conclusions

As a general conclusion, this report shows that 10 of the 19 indicators identified by ERGP in the 2012 Report are being monitored by the majority of the NRAs. From the 9 exceptions, it is relevant to mention that 2 NRAs plan to start monitoring, in the next two years, the investment in the postal sector.

Market outcomes indicators

End-user price of service provided at single piece tariff for typical residential customer is an indicator that most of the countries are monitoring (28 out of 33) for the USP. However, the majority (20 countries) do not collect price data for bulk mail.

Market structure indicators

Based on the research on market structure indicators, ERGP can make the following conclusions:

- The most commonly used indicators are the number of active postal service providers and market shares by volumes or revenues;
- Market concentration indicators such as the CRn and HHI are not so used between NRAs to estimate the level of competition between postal service providers or relevant barriers to entry the market;
- The majority of NRAs get the necessary data for calculating indicators directly (e.g. through questionnaires developed by NRA) and only few countries use other sources;
- ERGP recommended in the 2012 report to calculate market structure indicators at least annually and this review revealed that most NRAs follow this recommendation;
- Aggregation level of these indicators varies between countries; however the most common level is calculation by providers or market (i.e. of all postal area, of universal postal area and non-universal postal area).

Revenues and volumes

It appears on the ground of the answers to the questionnaire that the indicators of the 2012's ERGP report were satisfactorily put in place. ERGP notices in particular that indicators on revenues and volumes are monitored by almost all NRAs.

Full market opening since 2013 may explain why most countries do not monitor the percentage of revenues (or volumes) of the reserved area.

Access points

Almost all NRAs collect data on the number of postal establishments, and the majority of NRAs collect the information directly and on an annual basis. More NRAs collect the information for the USP and other providers than for the USP only. However, when it comes to the calculations of postal coverage and postal density, the majority of NRAs do not collect this information. This may be due to these metrics being more appropriate for cross-country comparisons than for domestic use. For all of the indicators on postal

establishments, the majority of NRAs use the definition of the indicator as set out in the 2012 ERGP report.

Most NRAs use this indicator for a number of purposes, with for public reports being the most common. However, a majority of NRAs use this indicator for all of the purposes set out in the survey.

Customer satisfaction

While the majority of NRAs (26) collect data on customer complaints by category, 14 stated that they monitor customer satisfaction indexes.

Employment indicators

The majority of NRAs collect data on the number of persons employed in the postal sector, with most of those that collecting it directly and on an annual basis. Most NRAs collect employment information from the USP and other providers, with three NRAs collecting this indicator for the USP only. Twenty-three NRAs use the definition of the indicator as set out in the ERGP report, while five do not.

The most common use of this indicator is for public reports, but it is used for multiple purposes by most NRAs.

Investment

Based on responses provided by 33 countries, 13 countries collect this indicator while 18 countries do not. There are 2 countries that intent to collect this indicator in the next 2 years.

Additional category of indicators

A minority of NRAs are collecting information on digital mail services, hybrid mail services, reversed hybrid mail services, document exchange service, e-billing/e-invoicing services and e-commerce.

Power of NRAs to collect and publish data

In general, the NRAs have powers to collect data from the postal service providers and to publish the information collected, the majority implementing practices to preserve the confidentiality of the data collected and published.