

Chairman of the ERGP
Prof. Angelo Marcello Cardani
European Commission
DG GROW
Avenue des Nerviens 105
1040 Etterbeek
Belgium

Brussels, 19 January 2017

PostEurop Ref: JPF/017/004/aa

Dear Prof. Cardani,

We would like to thank you for your letter dated 11 January 2017, in which you have expressed your understanding and recognition with regard to PostEurop difficulties to meet the deadline of 5 January set out for the public consultation of the ERGP Draft Work Programme - ERGP (16) 33. Further to this, we are also very grateful for your willingness to appreciate our reply intended for the 20 January, which is consumed in the present letter and its attached documents.

Referring to the ERGP (16) 33 document, we would like to comment that we have appreciated, in general, the items outlined in this work programme, which are in line with work developed previously and up to date regarding the actuality of its issues. Especially, regarding the USO, we appreciate the commitment of ERGP to address the main strategic topic of "promoting sustainable provision of a universal postal service".

We have noticed an emphasis on the topics concerning access regulation. We would argue that the ERGP should not focus on the technical aspects of how access should be assessed. Instead it should set out the rationale for granting access. An evaluation of the pros and cons could be valuable. There is no need for the ERGP to look into those member states which already have well developed competition, being it access and/or end-to-end competition.

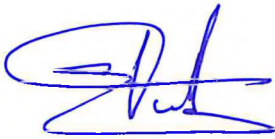
To build on the positive experiences of an open dialogue with ERGP, PostEurop proposes to organise three meetings (one for each pillar) where the teams on the ERGP side, responsible

for drafting the reports, and actively involved PostEurop Members could exchange views and observations on the subject. The idea behind is to have an open discussion not primarily limited to formal position statements.

We would, therefore, refrain at this moment from formulating industry positions on all subjects mentioned in your work programme. However, we are pleased to add to this letter the most recently published position on the proposed Parcel Delivery Regulation. On USO and other subjects positions are available on our website, using the following link: <http://www.posteurop.org/Publications>.

We look forward to hear from you soon regarding our proposal above.

Sincerely,



Jean-Paul Forceville
Chairman of PostEurop

Cc: Mr. Harrie Temmink, Acting Head of the Public Interest Services Unit at DG GROW, EC
Attach: *PostEurop position paper on EC proposal for regulation of cross-border parcel delivery_EN*