

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

Brussels, 4 October 2017

**PostEurop Ref: JPF/017/049/aa**

Dear Prof. Cardani

Posteurop is pleased to acknowledge the launch by ERGP of the public consultation on its Draft Work Programme for 2018, open until the 5<sup>th</sup> October 2017.

We would refrain at this moment from formulating industry positions on all subjects mentioned in your Draft Work Programme. Nonetheless PostEurop welcomes that the essential topics for the future of the industry are taken into account in its draft. Especially regarding new regulatory needs of the postal sector, sustainability of the Universal Postal Service, delivery for e-commerce and consumer protection. European postal operators appreciate ERGP's commitment to addressing the main strategic issues.

The industry is facing important challenges and tough economic strains with massive volume declines in letters. The sustainability of the Universal Service Obligations is therefore severely questioned. PostEurop reminds the ERGP that the universal service for post remains intrinsic to social and economic inclusion across Europe. It is especially important for vulnerable consumers and small businesses.

The upcoming work on the Postal Services Directive is an opportunity for stakeholders to start a fruitful exchange on the future regulatory framework. The European Commission launched preparatory studies such as the "Study on the main developments in the postal sector (2013-2016)" that we hope will make/bring a positive contribution to the discussions. The postal industry highlights the need for a balanced and flexible approach at the European level to cope with current sector circumstances.

In these difficult times and in the perspective of the future review of the Postal Services Directive, it is essential to engage in an intensive and open dialogue between the ERGP and the stakeholders, as we already expressed in our contribution to the ERGP's consultation on the 2017 Work Programme.

PostEurop is therefore grateful that the ERGP received on the 8<sup>th</sup> September a delegation of the association during its Steering Committee where we presented our concrete proposal to achieve this dialogue. As agreed during the meeting, PostEurop and the postal operators wish to hereby reiterate their proposition and confirm their commitment to building an open dialogue with the ERGP on important subjects raised by

the Draft Work Programme. Please find in the appendix our proposal for ERGP-PostEurop forthcoming cooperation. We look forward to the ERGP's response on this matter.

PostEurop is fully open to discuss this proposal and the most suitable format for the ERGP in order to move forward.

Sincerely,



Jean-Paul FORCEVILLE  
Chairman of PostEurop

CC : Jack Hamande, vice chair.

## - APPENDIX - “Cooperation model” proposal and calendar

PostEurop proposes to initiate a dialogue with the ERGP according to a light, open and informal “cooperation model”. The main elements of the proposal are described below.

### Participants

*From ERGP:* Co-chairs and active working group’s members.

*From PostEurop:* Working groups’ members that are willing to provide inputs and discuss openly.

### Content and format

PostEurop suggests organising three meetings (*see subjects below*) on the main issues regarding the ERGP Work Programme. For each scheduled meeting a preparatory meeting of the co-chairs (one ERGP, one PostEurop) should be set to select and decide on the issues to be discussed.

At the scheduled meeting, with WG-representatives from both sides, each should present his/her observations or inputs on the topic that was proposed by this representative, followed by an open discussion. No formal report/minutes, nor public reference to statements made in the meeting should be published, according to Chatham House rules<sup>1</sup>.

### Setting

The setting should be informal, a round table, including 10-15 persons.

### Subjects

PostEurop identified two main issues of ERGP work stream to address.

We would like to exchange views on the ERGP work stream on the regulatory needs of the postal sector [#1]. As it is a cross pillar, dense and long term project, we believe that two meetings should be scheduled throughout the year 2018.

As for the other work stream, PostEurop would be pleased to provide its expertise on the cross-border parcels delivery for e-commerce purposes [#2, Pillar 2.1] issue.

The ERGP is welcome to suggest any other topic of common interest.

Please find below a proposal for a time framework, designed to meet ERGP expected deadlines:

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<sup>1</sup> “When a meeting, or part thereof, is held under the Chatham House Rule, participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed.” – Chatham House, The Royal Institute of International Affairs

Time Framework	Issues	ERGP expected timing
First Quarter 2018	#2 Cross-border parcels delivery for e-commerce purposes	➤ ERGP Plenary I 2018 <i>Depending on the date of adoption and application of the Regulation</i>
Second Quarter 2018	#1 Regulatory needs of the postal sector	➤ ERGP Plenary II 2018 and ERGP Plenary I 2019
Third/Fourth Quarter 2018	#1 Regulatory needs of the postal sector	➤ ERGP Plenary II 2018 and ERGP Plenary I 2019