



Brussels, 6 October 2017

Dear Sir, Madame,

In line with previous EMOTA positions, we welcome the commitment of the ERGP and the EU Commission to ensure the best application of the EU framework for postal services and guarantee a proper enforcement of the rules.

We submit the following high level messages in the context of the ERGP consultation on the 2018 Working Programme. We would like to highlight the following aspects:

- eCommerce is undoubtedly the future for Postal Operators and while this seems self-explanatory, this will not be automatically captured without a strong focus on the retailer and recipient needs – the markets are evolving extremely fast and so should the sector
- Competition is high in the B2B and large volume parcel segments. It is less important in over the counter and single piece segments. As a result, and as noticed by the EU Commission, inconsistencies can be observed in these areas.
- Postal operators should integrate more effectively the digital technologies with the physical processes not just in the back-office space but also in the shipper and recipient facing operations.
- As the eCommerce market is ultra-competitive, with around 750.000 shops across the EU, there is no justification for any price intervention restricting the freedom of sellers to set the prices for their products.
- A revision of the Universal Service Obligation for letter mail should not ignore the development of the parcel market and the needs of this segment, which in some cases might require more regular and timely and timed deliveries, or more flexibility.
- Policy makers should encourage the further development of standards around eCommerce, with the goal to increase the competitiveness of all players across the market.

In addition, in light of the ambitious work programme presented by the ERGP, EMOTA would also strongly encourage a more institutionalized dialogue between the ERGP and the users of postal services, the online sellers. The rapid growth and evolution of the sector's needs require an equally well adapted approach to enforcement and policy making.

For example, we are certain the ERGP would benefit from an increased involvement of user representatives in the debates and initiatives touching on the needs of online sellers.

With high regards
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