ERGP REPORT ON THE QUALITY OF SERVICE, CONSUMER PROTECTION AND COMPLAINT HANDLING – AN ANALYSIS OF TRENDS

Version of 15 December 2017



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1. EXECUTIVE SUMMARY

A. Background

According to Chapter 6 of the Postal Directive, national regulatory authorities (hereinafter NRAs) shall ensure compliance with the obligations arising from the Directive, in particular through the follow-up of the quality of service.

Quality of service standards regarding the universal service (US) are established in order to guarantee a postal service of good quality. These quality standards should in particular focus on routing times, as well as on the regularity and reliability of services.

The ERGP continuously monitors the effects of postal liberalisation through appropriate indicators by benchmarking the quality of postal services and their development over time, including end-user complaint procedures to ensure that consumers are protected according to the provisions of the Directive.

This document aims at:

- a) reporting on the core quality of service indicators to monitor market development, evaluating the results of regulatory measures and the consumer protection measures taken especially in the field of complaint handling;
- b) reporting on the core indicators to monitor consumer protection and complaint handling.

B. Methodology

The report is based on the replies received from the 33 ERGP members to a questionnaire requesting data for 2016 on quality of service and end-user satisfaction, including consumer protection and complaint handling.

C. Current situation regarding quality of service and end-user satisfaction

The quality of service and the end-user satisfaction have been analysed taking into consideration the following five dimensions:



Measurement of the quality of service concerning routing times and the regularity and reliability of services

All 33 ERGP members have defined regulatory objectives which deal with universal service regarding transit time. Also 9 countries (27%) have some kind of regulatory objectives regarding loss or substantial delay and 4 countries (12%) have regulatory objectives regarding queuing time in post offices.

In 2016, 31 countries (94%) had regulatory objectives for priority mail and 20 for non-priority mail (61%). The average value of results (D+1) in countries which provided information on the results (28 countries) was 85.49%, which is lower than in the previous year (86.7% for 28 countries) and which is the second consecutive drop in quality results since the ERGP reporting. Amongst the countries which provided their results and targets (27 countries), the universal service provider (USP) achieved the targets regarding D+1 in 17 countries, while in 10 countries the universal service provider (USP) did not.

2. Collection and delivery

Regarding the frequency of collection and delivery to be carried out by the USP, the responses received revealed that the Directive has been implemented by all ERGP members which have established at least one collection/delivery for 5 days a week (in some countries the obligations have been extended to 6 days per week).

Nonetheless, many countries have granted exceptions regarding frequency of collection and in particular delivery. Responses revealed that these exceptions are mainly related to mountain areas, insularity, population density, low traffic volumes, poor infrastructure, cost of service and extreme weather conditions.

In certain countries, due to high costs involved in providing access to the universal service, especially in depopulated areas and isolated geographic areas, exceptions are implemented regarding the delivery of mail to the home or premises of recipients. The most common criteria are geographical conditions, population density, health and safety concerns and areas with lack of street names. The majority of answers revealed that the delivery service in these situations is directed to local post offices, cluster boxes, curbside letterboxes or, in other cases, to townhalls, public authority's offices, individual arrangements, etc.



3. Access points

The access point is a rather very sensitive issue and this is reflected by the fact that a vast majority of the countries deem it necessary to have requirements or standards to ensure an adequate number of collection letterboxes and points of contact/postal establishments.

Regarding collection letterboxes we notice in all countries, except one, a significant decrease in the number of collection letterboxes during the last 8 years. Concerning the points of contact, we notice that there are different types of points of contact at the European level but the most common is still the permanent post office managed by the USP with a full range of services followed by the post agency managed by a third party.

4. Measurement of consumer satisfaction

According to the responses to the 2016 questionnaire, around 39% of the NRAs monitor indicators of consumer satisfaction in their country and almost all of these publish the respective results. The results from the 2016 questionnaire show that 36% of the USPs in Europe conduct studies regarding the level of consumer satisfaction and publish the results.

5. Surveys regarding consumers' needs and market surveys

In terms of measuring consumers' needs and market surveys, 52% of the NRAs indicated that they conduct such surveys, and most of them publishing the results. Only 18% of NRAs indicated that the USP conducts surveys regarding customers' needs, but the large majority of respondent NRAs do not have information regarding this issue from their USP.

D. Current situation regarding consumer protection and complaint handling

The report examines five key issues in the field of consumer protection and complaint handling, namely:

1. Competence of NRAs regarding complaint handling

In the large majority of countries (78%), NRAs have this competence, most of which covering complaints about all postal services. In almost all of the countries where NRAs are responsible for dealing with users' complaints, the NRAs have procedures in place to resolve those complaints.



2. Information provision and access to complaint handling and dispute resolution

In 2016, the majority of countries had obligations in place for postal service providers to publish information regarding complaint procedures, compensation schemes and dispute resolution (usually on the providers' website, access points, general terms and conditions), covering the USP in most situations.

For the last three years the number of countries where alternative (or out-of-court) dispute resolution mechanisms are available to consumers has been increasing from 22 in 2014 to 29 in 2016.

3. Compensation schemes for individual customers

Regarding the scope of existing compensation schemes, most countries (22 out of 32 or 69%) have an obligation for a specific compensation scheme which concerns the USP. This also extends to other postal service providers in 14 countries.

4. Indicators on complaints

This new subchapter focuses on the measurement and publication of complaints handling indicators by the USP, analysing existing obligations and their scope. In the majority of countries (67%), USPs are obliged to measure and/or publish indicators on the complaints they receive. This obligation is normally set by the postal law, but in some cases is derived from licence conditions or NRAs determinations.

5. Data on complaints by NRAs

Here we look at the data NRAs are collecting on the number of complaints about postal services in general and, in particular, about cross-border services. Most NRAs mentioned items lost, damaged or substantially delayed as the main reasons for cross-border complaints in 2016. Also we report on the published data.

The vast majority of NRAs (79%) collect and publish data on complaints received by the USP regarding universal services. More NRAs are collecting the number of complaints received by the NRA and by other postal service providers.



2. BACKGROUND

Chapter 6 of Postal Directive 97/67/EC, as amended by Directives 2002/39 and 2008/6 (afterwards referred to as Directive in this report), lays down that the NRAs shall ensure compliance with the obligations arising from the Directive, in particular through the follow-up of the quality of service.

The Directive emphasises that the postal reform has brought significant positive developments in the postal sector, increasing both quality of service and focus on meeting consumer needs. Increased competition allows consumers to take advantage of a wider choice of products and services offered by postal service providers and allows these products and services to be continually improved in order to meet consumer demand.

Quality of service standards regarding the universal service are established and published in order to guarantee a postal service of good quality. Quality standards have to focus, in particular, on routing times and on the regularity and reliability of services.

The ERGP continuously monitors the effects of postal liberalisation through appropriate indicators such as benchmarking the quality of postal services and their development over time, including enduser complaint procedures to ensure that consumers are protected in accordance with the provisions of the Directive.

The objective is to collect the necessary data to monitor quality of service, end-user satisfaction, consumer protection and complaint handling within the context of the regulatory measures taken in those fields.

The document aims at:

- a) reporting on the core quality of service indicators to monitor market development, evaluating the results of regulatory measures and the consumer protection measures taken especially in the field of complaint handling;
- b) reporting on the core indicators to monitor consumer protection and complaint handling.

The report looks at the current and past situation of data collection and publishes indicators regarding quality of service, consumer protection and complaint handling. It then analyses this data and identifies market trends regarding quality of service, quality of delivery, customer satisfaction and development of the postal network, as well as consumer protection and complaints handling. The report has been published yearly since 2011 and the objective is to update this report on an annual basis.



This ERGP report describes the current NRAs' practices concerning quality of service, consumer protection and complaint handling as well as the current scope, competencies and powers of NRAs.

The report examines five key issues in the field of quality of service and end-user satisfaction, namely:

- measurement of quality of service concerning transit time, regularity and reliability of services;
- 2. collection and delivery;
- 3. access points;
- 4. measurement of consumer satisfaction;
- 5. surveys regarding customers' needs.

The report also examines five key issues in the field of consumer protection and complaint handling, namely:

- 1. competence of NRAs on complaints handling;
- 2. information provision, access to complaint handling and dispute resolution;
- 3. compensation schemes for individual customers;
- 4. indicators on complaints
- 5. data on complaints by NRAs



3. METHODOLOGY

In order to gather information regarding quality of service and end-user satisfaction in the broad sense of the term, including information regarding complaint handling and consumer protection, a questionnaire was submitted in May 2017 to ERGP members and observer NRAs (33 countries) in order to collect information on the situation of 2016 (except stated otherwise in the report).

We received replies from the 33 ERGP members, which are the following: Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Finland, France, the Former Yugoslavia Republic of Macedonia (FYROM), 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.

This report is primarily based on the answers provided to the questionnaire, which overall, reflects the legislation and practice in place at the end of 2016.

The data used in the report is already collected by NRAs and is publicly available data¹, which means that NRAs did not collect data specifically for the purpose of this ERGP exercise.

For some indicators, we used data already included in previous ERGP reports (based on the NRAs' responses to the ERGP questionnaires, ranging from 2008 to 2016).

With the objective of identifying geographical trends and to present the information in a more appealing way, for some indicators a cluster analysis was made using the following clusters²:

- Western countries: AT, BE, DE, DK, FI, FR, IE, LU, NL, SE, UK;
- Southern countries: CY, EL, ES, IT, MT, PT;
- Eastern countries: BG, CZ, EE, HR, HU, LT, LV, PL, RO, SI, SK;
- Countries outside the European Union (EU): CH, FY, IS, NO, RS.

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¹ Only public data was included in the report, confidential figures are not presented individually.

² Classification also used in some of the postal studies commissioned by the European Commission.



4. CURRENT SITUATION REGARDING QUALITY OF SERVICE AND END-USER SATISFACTION

The quality of service and the end-user satisfaction have been analysed based on the following dimensions:

- 4.1 measurement of the quality of service concerning transit time and the regularity and reliability of services;
- 4.2 collection and delivery;
- 4.3 access points;
- 4.4 measurement of consumer satisfaction;
- 4.5 surveys regarding customers' needs.

Other elements could also be used to monitor quality of service and end-user satisfaction, but in this report the scope has been limited to the above-mentioned dimensions.

We have also referred to the technical standards developed by the European Committee for Standardisation (hereinafter CEN) in the field of quality of service, as laid down in Article 20 of the Directive.

4.1. Measurement of quality of service concerning routing times, regularity and reliability of services

In accordance with the Postal Directive 97/67/EC (especially Chapters 6 and 7 and Annex 2), one of the main tasks of the NRAs is to monitor the quality of service in order to guarantee a postal service of good quality. Quality of service standards have to be set and published in relation to the universal service in order to guarantee a postal service of good quality and have to focus, in particular, on transit times and on the regularity and reliability of services.

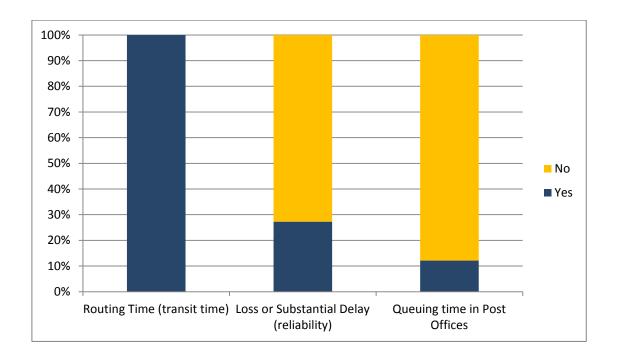
The figure below provides details regarding the definition of regulatory objectives for transit time, queuing time in post offices and loss or substantial delay. Regarding the quality of services, all 33 countries define regulatory objectives which deal with universal service regarding transit time. Only 9 countries (27%) have some kind of regulatory objectives regarding loss or substantial delay, which is more than in 2015 (5 countries). Switzerland and Serbia have no regulatory objectives but rather a measurement obligation for loss or substantial delay. Moreover, 4³ countries (12%) have regulatory objectives regarding queuing time in post offices, which is less than in 2015. Serbia and Spain have no regulatory objectives but rather a measurement obligation for queuing time in post offices.

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³ BE, BG, PT, SK



Figure 1 – Regulatory objectives in 2016



The majority of the countries have regulatory objectives for priority mail. According to the figure below, in 2016, 31 countries (94%) had regulatory objectives for priority mail and 20 for non-priority mail (61%). Amongst the 33 countries, 22 countries (67%) had regulatory objectives for parcels, 14 countries (42%) for registered items, 6 countries (18%) for bulk mail and 2 countries (6%) for newspapers/periodicals.

Figure 2 – Regulatory objectives for transit time in 2016 – which kind of service has a regulatory objective

	Priority mail	Non-priority mail	Registered items	Bulk mail	Newspapers / periodicals	Parcels
AT	✓	-	✓	-	-	✓
BE	✓	✓	✓	-	-	✓
BG	✓	✓	-	=	-	✓
СН	✓	✓	-	=	-	✓
CY	✓	-	-	=	-	-
CZ	✓	-	-	=	-	-
DE	✓	-	✓	=	-	✓
DK	-	✓	-	=	-	✓
EE	✓	-	-	=	-	-
EL	✓	-	-	-	-	-
ES ⁴	✓	-	-	✓	-	✓
FI	✓	✓	-	-	-	-
FR	✓	✓	✓	-	-	✓

⁴ In Spain single piece priority mail data and bulk mail data are measured together



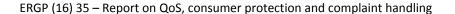


	Priority mail	Non-priority mail	Registered items	Bulk mail	Newspapers / periodicals	Parcels
FY	-	✓	-	-	-	✓
HR	✓	✓	-	-	-	-
HU	✓	✓	✓	✓	-	✓
IE	✓	-	✓	✓	-	-
IS	✓	✓	-	-	-	-
IT	✓	✓	✓	✓	-	✓
LT	✓	✓	✓	-	-	✓
LU	✓	✓	✓	✓	-	-
LV	✓	✓	✓	-	-	✓
MT	✓	-	✓	✓	✓	✓
NL	✓	-	-	-	-	-
NO	✓	✓	-	-	-	✓
PL	✓	✓	-	-	-	✓
PT	✓	✓	✓	-	✓	✓
RO	✓	-	-	-	-	✓
RS	✓	✓	-	-	-	✓
SE	✓	-	-	-	-	-
SI	✓	-	-	-	-	✓
SK	✓	✓	✓	-	-	✓
UK	✓	✓	✓	-	-	✓
Total 33	31	20	14	6	2	22

The figure below details if countries set regulatory objectives for cross-border services and if they had the corresponding results of quality of service.

Figure 3 – Cross-border information per country for 2016

	Regulatory objectives regarding cross-border services	Results regarding cross-border flows?
Austria	Yes	Yes
Belgium	Yes	Yes
Bulgaria	Yes	Yes
Croatia	Yes	Yes
Cyprus	Yes	Yes
Czech Republic	No	Yes
Denmark	No	No
Estonia	No	Yes
Finland	Yes	No
FYROM	No	No
France	Yes	Yes
Germany	Yes	No
Greece	Yes	Yes
Hungary	Yes	Yes
Iceland	Yes	Yes
Ireland	Yes	Yes
Italy	Yes	Yes
Latvia	No	Yes
Lithuania	Yes	Yes
Luxembourg	Yes	Yes
Malta	Yes	Yes





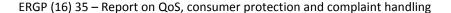
	Regulatory objectives rega cross-border services	_	Results regarding cross-border flows?	
Netherlands		No		No
Norway	Yes		Yes	
Poland		No		No
Portugal	Yes		Yes	
Romania	Yes		Yes	
Serbia	Yes		Yes	
Slovakia		No		No
Slovenia	Yes		Yes	
Spain	Yes		Yes	
Sweden		No		No
Switzerland		No	Yes (Confidential)	
United Kingdom	Yes		Yes	
Total of "yes"	23		25	

In 2016, 23 countries set regulatory objectives for cross-border services. Amongst the countries which established targets, 2 indicate that they do not have the corresponding results. A total of 25 countries indicated they have the results regarding quality of service for cross-border flows. For their part, Switzerland indicates that this information is confidential.

According to the figure below, 2 countries set objectives for D+1, 22 countries established an objective regarding D+3 and 21 countries had an objective regarding D+5 delivery. Only 17 (52%) presented the results of transit time for cross-border flows in 2016.

Figure 4 – Targets and results of cross-border mail in 2016

	D-	+1	D-	+3	D-	+5
	Target	Result	Target	Result	Target	Result
Austria	-	-	85.00	na yet	97.00	na yet
Belgium	93.00	89.70	85.00	-	97.00	-
Bulgaria	-	-	85.00	44.00	97.00	85.00
Croatia	-	-	85.00	63.90	97.00	90.60
Cyprus	-	-	85.00	39.00	97.00	75.80
Estonia	-	-	-	75.50	-	92.90
Finland	-	-	85.00	na	97.00	na
France	-	-	90.00	83.40	97.00	96.00
Germany	-	-	85.00	na	97.00	na
Greece	-	-	85.00	68.60	97.00	90.90
Hungary	-	-	85.00	74.10	97.00	92.70
Iceland	-	ı	90.00	81.00	97.00	96.00
Ireland	-	-	85.00	-	97.00	-
Italy	-	-	85.00	76.90	97.00	91.30
Lithuania	-	ı	85.00	67.01	97.00	89.95
Luxembourg	-	ı	85.00	na	97.00	na
Malta	95.00	93.48	-	-	-	-
Norway	-	=	85.00	77.80	97.00	94.30
Portugal	-	=	88.00	86.00	97.00	97.10
Romania	-	-	85.00	na	97.00	na





	D-	+1	D	+3	D+5		
	Target	Result	Target	Result	Target	Result	
Serbia	-	-	85.00 ⁵	58.45	97.00	87.90	
Slovenia	-	-	85.00	81.20	97.00	94.50	
Spain ⁶	-	-	85.00	-	97.00	-	
United Kingdom	-	-	85.00	86.10	-	-	
Total	2	2	22	15	21	14	
Average	94.00	91.59	85.62	70.86	97.00	91.07	

4.1.1. Measurement of quality of service for single piece priority mail in 2016

In 2016, 28 countries set targets for measuring the transit time of end-to-end priority mail in the domestic postal market. There is a wide range of targets across the ERGP countries reflecting different national considerations and, as such, comparisons between ERGP countries cannot be drawn.

The figure below shows the countries which established targets from D+1 to D+5 delivery regarding single piece priority mail and their results for 2016, according to which:

- 28 countries set a target for D+1 delivery, of which 15 countries at 90% or more. In comparison to 2015, in 2016 Poland increased D+1 target from 68.50% to 82.00%.
 Switzerland still had the highest target (97%);
- 27 countries provided their results for 2016 and the average value was 87.44% which is higher than the previous year (86.36%);
- 13 countries set a target for D+2 delivery, ranging from 85% (Serbia) to 99.50% (Slovenia);
- 14 countries established a target for D+3 delivery;
- Only Austria (100%) and Italy (98%) set targets for D+4. Denmark (93%) and Spain (99%) set targets for D+5.

Figure 5 – Targets and results of single piece priority mail in 2016

	D+1		D+2		D+3		D+4		D+5	
	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result
AT	95.00	na yet	98.00	na yet	-	-	100.00	na yet	-	-
BE	93.00 ⁷	90.92	97.00 ⁸	97.78	-	-	-	-	-	-
BG	80.00	59.70	95.00	86.10	-	-	-	-	-	-
СН	97.00	98.00	-	-	-	-	-	-	-	-
CY	90.00	90.03	-	-	97.00	99.20	-	-	-	-
CZ	92.00	93.93	-	-	-	-	-	-	-	-

 $^{^{\}rm 5}$ Only for EU Countries

⁶ Results are available only link by link

 $^{^{7}}$ 93.00 by law, 95.00 by management contract namely a common target for all postal services within the small user basket

⁸ By law



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	D	+1	D.	+2	D	+3	D-	+4	D	+5
	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result
DE	80.00	89.80	95.00	98.70	-	-	-	-	-	-
DK	-	-	-	-	-	-	-	-	93.00	96.00
EE	90.00	88.60	-	-	-	-	-	-	-	-
EL	87.00	86.10	-	-	98.00	99.50	-	-	-	-
ES ⁹	-	-	-	-	93.00	92.66	-	-	99.00	97.84
FI	Na	82.00	-	-	-	-	-	-	-	-
FR	85.00	84.90	-	-	99.00	99.10	-	-	-	-
HR	85.00	85.20	95.00	96.90	-	-	-	-	-	-
HU	90.00	90.00	-	-	97.00	99.40	-	-	-	-
IE	94.00	91.00	-	-	99.50	99.10	-	-	-	-
IS	85.00	87.00	-	-	-	-	-	-	-	-
IT	80.00	83.90	-	-	-	-	98.00	99.20	-	-
LT	85.00	83.10	-	-	97.00	98.60	-	-	-	-
LU	Na	Na	85.00	na	99.00	na	-	-	-	-
LV	90.00	94.50	-	-	-	-	-	-	-	-
MT	95.00	93.45	98.00	98.56	99.00	99.30	-	-	-	-
NL	95.00	96.40	1	-	-	-	-	-	-	-
NO	85.00	86.10	-	-	97.00	99.60	-	-	-	-
PL	82.00	59.20	90.00	88.80	94.00	96.60	-	-	-	-
PT ¹⁰	94.50	93.80 ¹¹	87.00	89.40	-	-	-	-	-	-
RO	85.00	33.09	97.00	64.77	-	-	-	-	-	-
RS	80.00	76.66	85.00	95.04	90.00	98.21	-	-	-	-
SE	85.00	91.25	-	-	97.00	99.70	-	-	-	-
SI	95.00	96.60	99.50	99.40	100.00	99.80	-	-	-	-
SK	93.00	95.51	99.00	99.59	-	-	-	-	-	-
UK ¹²	93.00	93.10	-	-	-	-	-	-	-	-
Total	28	28	13	11	14	13	2	1	2	2
Average	88.59	85.49	93.88	92.28	96.89	98.52	99.00	99.20	96.00	96.92

⁹ In Spain, there is no separation between single piece priority mail and bulk mail: the results of quality of service presented in this table include those of bulk mail

PT: D+1 applies to letters sent between any location of Portugal's mainland and D+2 applies to letters sent from, between or to any

location of the Autonomous Regions of Azores and Madeira.

11 The result did not achieve the target but it achieved the minimum level admissible (93.50%)

The figure in the table relates to FY 2016-17 (April 2016 to March 2017). The footnote refers to FY 2015-16 i.e. April 2015 to March 2016. I would remove the footnote as it refers to a previous year. Target and result relate to letters and parcels.



The figure below shows that, in 2016, 17 of the 27 countries which provided their targets and results regarding D+1 delivery achieved their target, while 10 countries did not. Amongst the countries which provided their results for 2014, 2015 and 2016 (D+1), 18 recorded progress (or stability) in their transit time quality while 9 recorded a decrease.

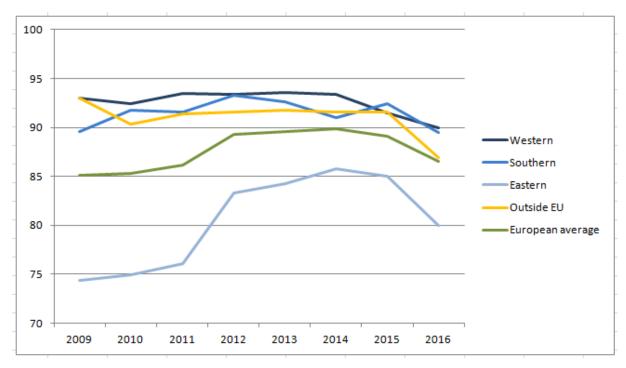
Figure 6 – Targets (2016) and results (2014, 2015 and 2016) regarding D+1 delivery of single piece priority mail

Note: Data considering the 30 countries that provided data since 2014 and until 2016 (Western: BE, DE, DK, FI, FR, IE, LU, NL, SE, UK; Southern: CY, EL, IT, MT, PT; Eastern: BG, CZ, EE, HR, HU, LT, LV, PL, RO, SI, SK; Outside EU: CH, IS, NO)

The figure below shows a relative stability of quality of service regarding priority mail (D+1) between 2009 and 2015, except for Eastern countries in which, although the quality results are lower than in the other geographical clusters of countries, they increased significantly since 2012. We can also note that levels of quality of service are quite similar in Western, Southern and non-EU countries during this period. However, since 2014 and especially in 2016 a significant decrease is noted for Western countries. Based on NRAs feedback, the USPs had to adapt their organisation to deal with the continuous decline of mail volumes since 2008 (closure of sorting centers, reorganisation of delivery centers and mailmen's tours, adaptation of schemes and modes of transport) which have an impact on the QoS results. External events have also had an impact on QoS results, especially weather conditions and strikes. The ERGP will continue to monitor this tendency very closely and analyse if this drop of quality is temporary or structural.



Figure 7 – Evolution of the average value of quality of service of single piece priority mail regarding D+1 delivery (2016)



Note: Data considering the 30 countries that provided data since 2014 and until 2016 (Western: BE, DE, DK, FI, FR, IE, LU, NL, SE, UK; Southern: CY, EL, IT, MT, PT; Eastern: BG, CZ, EE, HR, HU, LT, LV, PL, RO, SI, SK; Outside EU: CH, IS, NO)

Regarding the **measurement methodology**, in 2016, 29 countries used the European standard EN 13850¹³ for the measurement of single piece priority mail transit time¹⁴. When measuring the transit time, some events – which have been considered as **force majeure** regarding the European standard EN 13850 –, with potential impacts on quality of service can be excluded from the measurement. In accordance with EN 13850, in most countries (17¹⁵), the NRA decides on the application of force majeure events on request by the operator. Notwithstanding, the concept of force majeure has been defined in line with the standard, in only 12 countries¹⁶. In 2016, the number of days of force majeure accepted by the NRAs varied between zero and 2¹⁷ days, whereas, in 2015, it ranged between zero and 5 days.

Otherwise, amongst 33 countries, only 6¹⁸ indicated that there are other exceptions or adaptations in their country, during holiday periods, which can impact the quality of service measurement¹⁹. For

¹³ EN 13850 is a CEN standard for Postal Services – Quality of Services – Measurement of the transit time for single piece priority mail and first class mail

See annex 1

 $^{^{\}rm 15}$ Be, BG, CH, CY, DK, EL, ES, HR, HU, IE, IT, MT, NL, PT, RS, SI, SK.

 $^{^{16}}$ BE, BG, CH, CY, FY, HR, IS, LT, LU, PT, RO, RS

¹⁷ See annex 2.1

 $^{^{18}}$ BE, EL, EE, NO, PL, UK $\,$



instance, this is the case in Norway for the first day after Easter, and in Belgium, for three weeks in the Christmas period, the USP is allowed to sell Christmas stamps (with a delivery speed of D+3 instead of the standard D+1) which are excluded from the quality measurement system, however the standard D+1 stamp should always be available as an alternative to this Christmas stamp. Also, in the United Kingdom, there is an exception during the Christmas period, i.e. from the first Monday in December to the day after New Year's Day public holiday in January. In Greece, there is an exception for official or local holidays, which are normally deducted during the calculation of quality measurements on any given time period.

4.1.2. Measurement of quality of service for single piece non-priority mail in 2016

Only few countries have regulatory objectives for non-priority mail. Regarding the methodology of measurement of quality of service for single piece non-priority mail, 10 countries used the European standard EN 14508²⁰ while 6 countries used the EN 13850²¹.

The figure below presents the countries which had a regulatory objective for routing time of single piece non-priority mail in 2016. Based on this table, one can conclude that, in 2016, most countries had a target regarding D+3 (10). Bulgaria and Serbia (80%) had the lowest targets while France, Luxembourg and Slovakia (99%) had the highest. Only one country set a target regarding D+1 delivery, whereas 6 countries had a target regarding D+2 delivery; 5 countries set targets for D+4.

Figure 8 - Targets and results of single piece non-priority mail in 2016

	D+1		D+2		D-	+3	D-	+4	D-	+5	D-	+6
	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result
BE ²²	-	-	95.00 ²³	96.46	-	-	-	-	-	-	-	-
BG	-	ı	80.00	95.80	95.00	99.60	1	1	1	1	1	-
СН	-	ı	-	-	97.00	98.90	-	1	-	-	-	-
DK	-	ı	-	-	-	1	-	1	93.00	93.00	-	-
FI	-	ı	-	96.30	-	99.20	-	1	-	-	-	-
FR	-	-	93.75	94.90	-	-	99.00	99.50	-	-	-	-
FY												
HR	-	-	-	-	95.00	96.40	-	-	-	-	-	-
HU	-	-	-	-	85.00	85.70	-	-	97.00	98.00	-	-
IS	-	-	-	-	85.00	97.00	-	-	-	-	-	-
IT ²⁴	-	-	-	-	-	-	90.00	96.00	-	-	98.00	98.70

¹⁹ See annex 2.2

²⁰ EN 14508 is a CEN standard for Postal Services – Quality of Services – Measurement of the transit time for single piece non-priority mail and second class mail.

²¹ See annex 1

 $^{^{22}}$ Common target defined by the 5 $^{\rm th}$ Management Contract for all postal services within the small user basket.

²³ By management contract

 $^{^{24}}$ Target applicable from 1/10/15 to 31/12/15 for all postal items



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	D+1		D+2		D-	+3	D-	+4	D-	+5	D-	+6
	Target	Result										
LT	-	1	85.00	na	-	-	97.00	na	-	-	-	-
LU	na	na	85.00	na	99.00	na	-	-	-	-	-	-
LV	98.00	99.60	-	-	-	-	-	-	-	-	-	-
NO	-	-	-	-	-	-	85.00	87.90	-	-	97.00	99.70
PL	-	-	-	-	85.00	79.30	-	-	97.00	96.70	-	-
PT	-	-	-	-	96.30	96.10	-	-	-	-	-	-
RS	-	-	80.00	na	85.00	na	-	-	90.00	Na	-	-
SK	-	-	93.00	na	-	-	99.00	na	-	-	-	-
UK ²⁵	-	-	-	-	98.50	98.90	-	-	-	-	-	-
Total	1	1	7	4	10	9	5	3	4	3	2	2
Average	98.00	99.60	87.39	95.87	92.08	94.57	94	94.47	94.25	95.90	97.50	99.20

In 2016, France increased its target regarding D+2 delivery from 93.50% to 93.75%. Poland also increased its target regarding D+3 from 82.80% to 85.00%, but decreased its target regarding D+5 from 98.10% to 97%. In 2016, Latvia introduced a target for D+1 delivery and removed its target regarding D+3 delivery. The same year, Serbia created targets for D+2, D+3 and D+5 but indicates that there is no measurement of transit time in place.

Amongst the countries which provided their results for 2015 and 2016, 10 recorded a progress in their results while 3 showed a decrease, and 3 countries showed stability. The average value of the results regarding D+3 was about 94.57% which is lower than in the previous year (95.60%).

4.1.3. Measurement of quality of service for registered mail in 2016

The figure below presents the countries which had a regulatory objective for registered mail in 2016. Based on this table, one can conclude that:

- 7 countries set a quality target regarding D+1 delivery (AT, BE, DE, LT, MT, PT, UK) from 80%
 (DE) to 99% (UK);
- Regarding D+2 delivery, 6 countries set quality targets (AT, DE, FR, LU, MT, SK) from 85% (LU) to 99% (MT);
- 4 countries set targets for D+3, 4 countries for D+4 and one country respectively for D+5 and
 D+6.

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 $^{^{25}}$ Target and result relate to letters and parcels



Figure 9 - Targets and results of registered mail in 2016

	D+1		D+2		D+3		D+4		D+5		D+6	
	Target	Result										
AT	95.00	na	98.00	na	-	-	100.00	na	-	-	-	-
BE ²⁶	95.00	93.28	-	-	-	-	-	-	-	-	-	-
DE	80.00	89.80	95.00	98.70	-	-	-	-	-	-	-	-
FR	-	-	95.00	94.00	-	-	99.00	99.10	-	-	-	-
HU ²⁷	ı	1	1	-	85.00	96.10	-	-	97.00	99.30	-	-
IT ²⁸	ı	1	1	-	1	1	90.00	97.00	-	1	98.00	98.90
LT	85.00	-	-	-	97.00	-	-	-	-	-	-	-
LU	na	na	85.00	na	99.00	na	-	-	-	-	-	-
MT	98.00	99.39	99.00	99.85	99.00	99.93	-	-	-	-	-	-
PT	91.00	92.00	-	-	-	-	-	-	-	-	-	-
SK	-	-	93.00	na	-	-	99.00	na	-	-	-	-
UK	99.00	98.50	-	-	-	-	-	-	-	-	-	-
Total	7	5	6	3	4	2	4	2	1	1	1	1
Average	91.86	94.59	94.17	97.52	95.00	98.02	97.00	98.05	97.00	99.30	98.00	98.90

Portugal introduced targets for D+1 for the first time in 2016. Amongst the 12 countries which provided their targets and results, two countries showed a minor decrease, whereas all others recorded progress in comparison with the 2015 results of quality.

4.1.4. Measurement of quality of service for parcels in 2016

For the measurement of transit time of parcels, countries use different methodologies. According to their answers, 4 countries used the European standard TR15472, 6 countries used the standard EN13850 and 9 countries used another methodology.

The figure below presents the countries which had a regulatory objective for transit time for single piece parcels in 2016. Based on this table, the conclusions are the following:

- For D+1 delivery, 7 countries set targets (BE, BG, CH, DK, MT, PL, UK), from 80% for the lowest (PL, BG) to 98% for the highest (MT). All the countries that provided their results achieved their targets (except for Belgium and Bulgaria), with an average of 87.85%;
- Regarding D+2 delivery, 12 countries set targets. Malta (99%) presented the highest target, while FYROM (70%) had the lowest one. Most of the countries which provided their results exceeded their targets (96.26% on average), except for Bulgaria. Austria, Germany, FYROM, Romania and Serbia did not provide any results;
- Concerning D+3 delivery, 9 countries set targets, 75% being the lowest (FY) and 99% the highest (MT).

-

 $^{^{26}}$ Common target defined by the 5 $^{\rm th}$ Management Contract for all postal services within the small user basket.

²⁷ HU: these targets and results only apply for official documents that are a special registered item category. Otherwise the targets for normal registered items are the same as non-registered items but these are not measured.

²⁸ Target applicable from 1/10/15 to 31/12/15



- Some countries have targets but no results as in AT, DE, FY and RS, for example due to lack of measurement system in place (RO).
- France increased its D+2 target from 89.50% in 2015 to 90.00% in 2016.
- Poland increased its D+1 target form 79.50% in 2015 to 80.00% in 2016, but decreased its
 D+3 target from 98,30% in 2015 to 90,00% in 2016.
- Serbia removed its D+1 target, decreased its D+2 target from 95.00% in 2015 to 80.00% in 2016, its D+3 target from 99.00% in 2015 to 90.00% in 2016 and introduced a D+5 target (95%).

In 2016, 12 out of the 22 countries which provided their targets and results for parcels achieved their targets, 11 recorded progress (or stability) in their transit time quality regarding the previous year while 3 recorded a decrease.

Figure 10 - Targets and results of single piece parcels in 2016

	D+1		D+2		D+3		D+4		D+5		D+6	
	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result
AT	-	-	90.00	na yet	-	-	-	-	100.00	na yet	-	-
BE ²⁹	95.00	92.14	-	-	-	-	-	-	-	-	-	-
BG	80.00	53.20	95.00	92.00	-	-	-	-	-	-	-	-
СН	95.00	98.10	95.00	97.20	-	-	-	-	-	-	-	-
DE	-	-	80.00	na	-	-	-	-	-	-	-	-
DK	93.00	95.40	-	-	-	-	-	-	-	-	-	-
ES ³⁰	-	-	-	-	80.00	70.41	-	-	95.00	85.03	-	-
FR	-	-	90.00	92.20	-	-	98.50	99.30	-	-	-	-
FY	-	-	70.00	-	75.00	-	-	-	80.00	-	-	-
HU ³¹	-	-	85.00	96.30	95.00	99.00	-	-	-	-	-	-
IT	-	-	-	-	-	-	90.00	96.80	-	-	-	-
LT	-	-	-	-	-	-	97.00	na	-	-	-	-
LV	-	-	-	-	-	-	98.00	98.00	-	-	-	-
MT ³²	98.00	99.32	99.00	99.82	99.00	99.85	-	-	-	-	-	-
NO	-	-	-	-	-	-	85.00	87.90	-	-	97.00	98.20
PL	80.00	83.70	-	-	90.00	99.50	-	-	-	-	-	-
PT ³³	-	-	-	-	92.00	90.70 ³⁴	-	-	-	-	-	-
RO ³⁵	-	-	85.00	na	-	-	97.00	na	-	-	-	-
RS	-	-	80.00	na	90.00	na	-	-	95.00	na	-	-
SI	-	-	80.00	99.70	95.00	99.90	-	-	-	-	-	-
SK ³⁶	-	-	93.00	96.62	-	-	99.00	99.08	-	-	-	-

²⁹ Common target defined by the 5th Management Contract for all postal services within the small user basket.

ES: For the measurement of transit time of parcels, single piece parcels and bulk parcels are measured together.

 $^{^{31}}$ HU: These targets apply for single piece and bulk parcels together and they are measured together.

MT: There is no distinction between single piece parcels and bulk parcels.

³³ PT: Universal service, insurance and track & trace included.

 $^{^{34}}$ The result did not achieve the target, but it achieved the minimum level admissible (90,50%).

³⁵ RO: The procedure is not yet established due to the fact that the Romanian post did not provide this service (basic parcel).

 $^{^{36}}$ The NRA plans to audit the measurement.



	D+1		D+2		D+3		D+4		D+5		D+6	
	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result	Target	Result
UK	93.00 ³⁷	93.10	-	-	98.50 ³⁸	98.90	-	-	-	-	-	-
Total	7	7	12	7	9	7	7	5	4	1	1	1
Average	90.57	87.85	86.83	96.26	90.50	94.04	94.93	96.22	92.50	85.03	97.00	98.20

4.1.5. Additional information regarding quality of service in 2016

In addition to the measurement of transit time of the main postal services above (letters and parcels), some countries also used other types of indicators to monitor quality of service, such as the measurement of loss or substantial delay. Some countries also monitor transit time of bulk mail, newspapers and periodicals.

Regarding loss or substantial delay, 3 countries had regulatory objectives in 2016 (see figure below).

Figure 11 - Regulatory objectives for loss or substantial delay in 2016

	Priority mail	Non-priority mail	Registered items	Bulk mail	Newspapers / periodicals	Parcels
HU	-	-	✓	-	-	✓
MT	✓	-	-	✓	✓	-
PT	✓	✓	-	-	-	-
Total	2	1	1	1	1	1

In 2016, only Malta, Spain³⁹ and Hungary had regulatory objectives for transit time of **bulk mail**. France measured transit time of bulk mail but had no regulatory objective. Regarding the methodology⁴⁰, France, Hungary and Malta used the European standard EN 14534⁴¹.

Regarding newspapers and periodicals, Malta and Portugal set regulatory objectives, though in Malta, transit time of newspapers and periodicals are not measured separately but included under single piece and/or bulk mail. France measured transit time for newspapers and periodicals but without regulatory objectives.

 $^{^{\}rm 37}$ 1st class parcels included with the QoS measurement for 1st class (priority) letters

³⁸ 2nd class parcels included with the QoS measurement for 2nd class (non-priority) letters

³⁹ In Spain, single piece parcels and bulk parcels are measured together.

⁴¹ EN 14534 is a CEN standard for Postal Services – Quality of Services – Measurement of the transit time for bulk mail.



4.2 Collection and delivery

Regarding collection and delivery, we have detected three key elements. Of course the most important is the parameter on frequency of collection and especially deliveries. Secondly, we will explore the current exceptions to collection and delivery due to exceptional conditions. Thirdly, we will also look at the derogation of delivery to the home.

4.2.1. Frequency of collections and deliveries

Regarding the frequency of collections and deliveries made by the universal service provider (USP), with few exceptions, the rule is at least one collection and delivery per day for 5 days a week.

The exceptions are those countries in which the obligation to carry out the collection and delivery by the USP was extended to 6 days a week. More specifically, the countries that have at least one collection and delivery per day for six days a week are Bulgaria (at least two collection and delivery per day, only in Sofia), Germany, France, Malta, Serbia (collection) and the United Kingdom (for correspondence).

It should be noted that in most of the cases the extension from 5 to 6 days a week takes place only regarding the distribution of correspondence and newspapers.

The split information, specifically on collection and delivery, is shown in the next two figures.

Figure 12 – Frequency of collection in Europe in 2016

1 Collection / day / 5 days a week, namely Austria, Belgium, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Greece, Spain, Finland, Hungary, Ireland, Iceland, Italy, Lithuania, Latvia, Luxembourg, The Netherlands, Norway, Poland, Portugal, Romania, Sweden, Slovenia, Slovakia, Switzerland, the UK (for parcels) but in reality Royal Mail provides a 6-day-a-week service for parcels



Figure 13 – Frequency of delivery in Europe in 2016



1 Delivery / day / 5 days a week, namely Belgium, Croatia, Cyprus, the Czech Republic, Greece, Denmark, Estonia, Spain, Finland, Hungary, Ireland, Iceland, Italy, Lithuania, Latvia, Luxembourg, The Netherlands, Norway, Poland, Portugal, Romania, Sweden, Slovenia, Slovakia, Switzerland, Serbia and the UK but in reality Royal Mail provides a 6-day-a-week service for parcels

1 Delivery / day / 6 days a week, namely Germany, France, Malta, the UK (6 days for correspondence)

Combination of 5 and 6 delivery days a week, namely Austria (6 days for newspapers), Bulgaria (6 days for Sofia),

In 2016, we have three countries, namely Denmark, Italy and Netherlands which have recently made changes in frequency of delivery and collection. Please find below the most important elements of the changes in Italy, Denmark and Netherlands.

Italy: In 2015, the Italian legislator reduced the public funding for the USP and reviewed USP terms and conditions of supply. With Decision n.395/15/CONS⁴², AGCOM has consequently regulated the implementation of a new delivery model on alternate days in specific areas, providing a gradual introduction of the model through three phases (starting from 1 October 2015, April 2016 and February 2017 respectively). More details of the AGCOM decision are available in Annex 5.

⁴²https://www.agcom.it/documents/10179/2209608/Delibera+395-15-CONS/a9012437-c38c-4baa-8fd8-257472caba41?version=1.2



Denmark: In 2016, the terms of the Danish USP were changed as from 1 July 2016 day-to-day delivery of letters was exempted from the USO. Since 1 July 2016, day-to-day delivery is comparable to an express letter and consequently significantly more expensive than before this date and at the same time subject to VAT.

Letters to and from other EU/EEA countries must be sent as express mail (and marked as 'Prioritaire') in order to be handled as a day-to-day priority letter. The service requirement for all other, ordinary incoming letters is 5 working days.

Netherlands: As of 1st of January 2016 the Dutch Postal Act allows PostNL as the universal service provider to adapt their network of collection and delivery to make it more future proof in the light of volume developments and changing consumer behaviour. With the amendment of the Postal Act and the underlying Postbesluit 2009 the number of deliveries per week went from 6 to 5 days – with the exception of medical and mourning mail. Additionally, PostNL was allowed to reduce the number of street letterboxes for collection as the distance to a letterbox in areas with more than 5.000 inhabitants was enlarged to 1000 metres (instead of 500 metres before 2016) and to 2500 metres in areas with less than 5.000 inhabitants. Finally, in the Postbesluit the specific requirement for the number of postal establishments was withdrawn but the requirement to serve at least 95% of the inhabitants in areas with more (less) than 5.000 inhabitants at a full-service postal establishment within 5 kilometers was maintained.

4.2.2. Exceptions to collection and delivery due to exceptional geographical conditions

According to Paragraph 3 of Article 3 of the Directive⁴³, there may be exceptions in the frequency of collection/delivery in circumstances or geographical conditions deemed exceptional, which includes as a minimum: one clearance/one delivery to the home or premises of every natural or legal person or, by way of derogation, under conditions at the discretion of the national regulatory authorities, one delivery to appropriate installations. The directive underlines in the same paragraph that any exception or derogation granted by a national regulatory authority must be communicated to the European Commission, as well as to all the other NRAs.

⁴³ Article 3.3. "Member States shall take steps to ensure that the universal service is guaranteed not less than five working days a week, save in circumstances or geographical conditions deemed exceptional, and that it includes as a minimum:

⁻ one clearance

⁻ one delivery to the home or premises of every natural or legal person or by way of derogation, under conditions at the discretion of the national regulatory authority, one delivery to appropriate installations.

Any exception or derogation granted by a national regulatory authority in accordance with this paragraph must be communicated to the Commission and to all national regulatory authorities."



The reasons for the exceptions of USO obligations as pointed out by respondents are:

mountain areas:

- for collection (Bulgaria, France, Greece, Iceland, Norway, Romania, Serbia and Sweden);
- for delivery (Bulgaria, France, Croatia, Greece, Iceland, Norway, Romania, Serbia, Sweden, Switzerland and Slovakia).

population density:

- for collection (Bulgaria, Iceland, Italy, Norway, Romania, Serbia and Sweden);
- for delivery (Bulgaria, Switzerland, Croatia, Iceland, Italy, Norway, Romania, Serbia, Slovakia and Sweden).

low traffic volumes:

- for collection (Denmark, Italy, Romania and Serbia);
- for delivery (Denmark, Italy, Romania and Serbia).

costs of service:

- for collection (Iceland, Norway and Romania);
- for delivery (Iceland, Norway, Romania and Slovakia).

poor infrastructure⁴⁴:

- for collection (Bulgaria, Norway, Romania and Serbia);
- for delivery (Bulgaria, Norway, Romania, Serbia, Switzerland and the UK).

insularity:

- for collection (Denmark, Estonia, Finland, France, Greece, Iceland, Sweden and the UK);
- for delivery (Denmark, Estonia, Finland, France, Greece, Iceland, Sweden and the UK).

extreme weather conditions:

- for collection (Greece, Romania and Serbia);
- for delivery (Greece, Romania and Serbia).

⁴⁴ Depends on local circumstances, e.g. lack of roads.



Figure 14 - Reasons for exceptions regarding collection in 2016

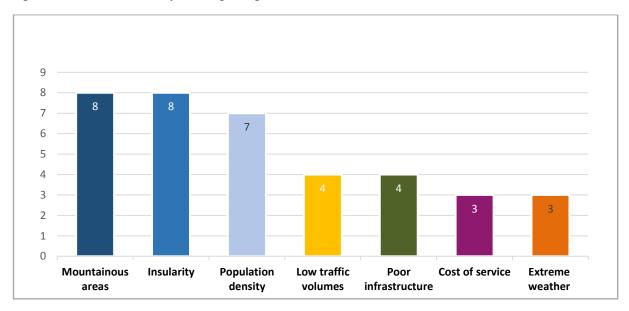
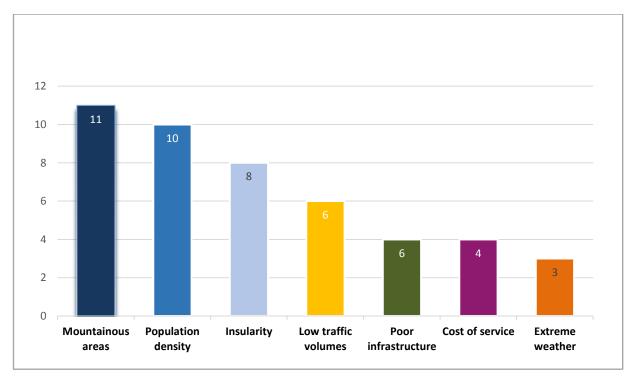


Figure 15 - Reasons for exceptions regarding delivery in 2016



The respondents who answered they have implemented exceptions regarding the frequency of service are:

- for collection: Bulgaria, Denmark, Estonia, Finland, France, Greece, Iceland, Ireland, Italy, Luxembourg, Norway, Romania, Serbia, Sweden and the UK;
- for delivery: Bulgaria, Croatia, Denmark, Estonia, Finland, France, Greece, Iceland, Ireland, Italy, Luxembourg, Norway, Romania, Serbia, Slovakia, Sweden, Switzerland and the UK.



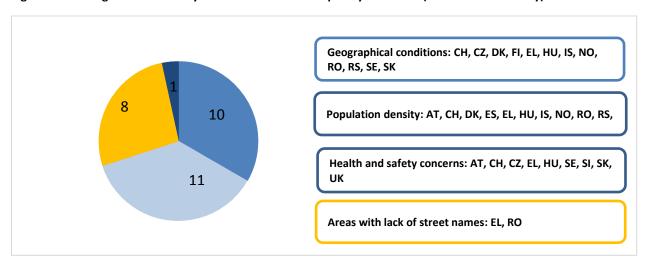
Only in 10 countries, the criteria establishing exceptional cases or locations where exceptions are applicable are both defined and published (Bulgaria, Estonia, Greece, Iceland, Ireland, Italy, Romania, Slovakia, Switzerland and the UK). These are available via the links indicated in Annex 4.

4.2.3. Obligation to deliver mail to the home or premises of every natural or legal person

Besides the frequency of collections and deliveries, several regulators have implemented some special criteria for defining cases in which the universal service providers are able to ensure the delivery of mail at the home or the premises.

In certain countries, due to high costs involved in providing access to the universal service, especially in depopulated areas and isolated geographic areas, exceptions have been implemented regarding the delivery of mail to the home or premises of the recipients. The most common criteria are population density, geographical conditions, areas with lack of street names, and health and safety concerns.

Figure 16 - Derogation of delivery to the home in the frequency of service (collection & delivery) in 2016



The majority of answers revealed that the delivery service in these situations is directed to local post offices (13 countries: AT, CH, CZ, EL, IS, LU, NO, RO, RS, SE, SI, SK, UK), cluster boxes (12 countries: AT, CH, EL, ES, HU, IS, LU, NO, SE, SI, SK, UK), curbside letterboxes (7 countries: CH, CZ, EL, ES, LU, RS, UK) or, in other cases, to townhalls, public authority's offices, individual arrangements, private addresses, local USP delivery offices, letterboxes on the main land, return to the sender, places determined by mutual agreement between user and USP, etc.

Regarding the number of households where the delivery service is not assured at their address, just 10 NRAs submitted estimated percentages (Austria -2%, the Czech Republic - approximately 0.002139%, Denmark - <1%, Hungary -1%, Iceland -5%, Norway -0.40%, Slovenia -0.50%, Spain -

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0.21%, Sweden -0.03%, Switzerland -0.07%, the UK -<1%) and 4 NRAs answered that in their cases these data are not available (The Netherlands, Luxembourg, Romania, Serbia, Slovakia).

Seven NRAs indicated that in their countries criteria for defining exceptions in terms of mail delivering to the home or premises of the recipient are established: Austria, Greece, Iceland, Slovakia, Slovenia, Spain and Switzerland. The large majority of NRAs answered that such criteria are not established in their countries.



4.3 Access points

In accordance with the European legislation⁴⁵, the postal access points are defined as the physical facilities of the postal network, where postal items may be deposited, to be processed by the postal providers.

In the sections below we explain two key components of the postal access points, namely:

- Collection letterboxes
- Points of contact

4.3.1. Collection letterboxes

Regarding the existence of any legal requirements or standards, 30 of 33 respondents (over 90%) have set requirements/standards to ensure that the USPs provide an adequate number of letterboxes, the only exceptions being France, Spain and Sweden where the regulation has not imposed such conditions.

More cases revealed that the adequate number of collection letterboxes is linked with the number of inhabitants, and is often linked with the distance that needs to be travelled to the access points (e.g. a maximum distance of 2 kilometers that one has to travel to the collection letterbox).

Furthermore, in some countries the number of collection letterboxes is linked to the number of inhabitants per geographical area, with differences of approach depending on the rural-urban medium or on the locality size (e.g. at least one collection letterbox per number of inhabitants depending on the type of settlement difference observed between urban and rural areas).

In more than 60% of the respondent countries, the legal requirements for ensuring an adequate number of collection letterboxes can be found mainly in the primary legislation, and in almost 40% of the cases these requirements are found in the regulations and decisions issued by NRAs. The single special case in this is the situation in Hungary, in which the detailed rules for ensuring the number of access points is regulated by way of contract between the State and the USP.

The collection time ⁴⁶ is marked on the collection letterboxes in all European countries.

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⁴⁵ Article 2 of Directive 2008/06/EC: "access points are the physical facilities, including letterboxes provided for the public either on the public highway or at the premises of the postal service provider(s), where postal items may be deposited with the postal network by senders."

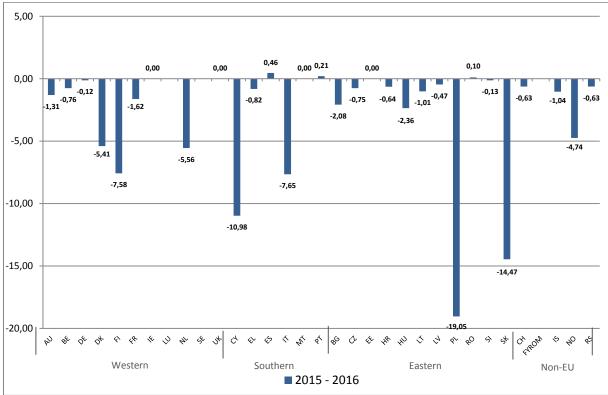
⁴⁶ "In IE the notice plates on all access points show the latest time of posting to achieve next day delivery"



Furthermore, information has been gathered regarding the evolution of the number of collection letterboxes since 2008. Where the data for 2008 were not available, the oldest data available were used.

The figures below show the percentage change in the number of collection letterboxes per country from 2015 to 2016 (1-year evolution) and from 2008 to 2016 (8-years evolution). The table with absolute values of the number of collection letterboxes per country is in Annex 6.

Figure 17 – Percentage change in the number of collection letterboxes per countries in 2016 compared with the situation in 2015



In 22 countries the number of collection letterboxes has been reduced in 2016, where in 4 countries the situation was unchanged but in 3 countries there was a very slight increase in the number of collection letterboxes, i.e. Portugal, Romania and Spain. In most European countries the increase in the number of collection letterboxes was in a range of maximum 2%. In 7 countries (CY, DE, FI, IT, NL, PL and SK) there was a reduction of more than 5%. The highest reduction of the number of collection letterboxes took place in Cyprus (11%), Slovakia (15%) and Poland (19%).



30 19 20 10 0 0 -10 -13 -20 -30 -32 -40 -50 -60 -70 Non-FU Western Southern Eastern 2008 - 2016

Figure 18 – Percentage change in the number of collection letterboxes per countries in 2016 compared with the situation in 2008

Note: Where the data for 2008 were not available, the oldest data available were used.

Ireland is the only European country where the number of collection letterboxes grew between 2008 and 2016^{47} . Otherwise, it can be seen that the number has declined in all countries except in Germany, Malta and the UK where the situation was unchanged during the last 8 years.

The respondents reported that the decreasing number of collection letterboxes is due to the decline in volumes of real flows processed by USPs. We can conclude that we can notice a significant decrease in collection letterboxes in 13 countries which means a decrease of more than 20% in the number of collection letterboxes during the last 8 years. In Croatia, Latvia, Lithuania and Portugal we have a reduction of 40% of the number of collection letterboxes, and a reduction of 50% in Norway and of 65% in Poland during the last 8 years from 2008 to 2016.

-

 $^{^{}m 47}$ Figures provided by the USP An Post in its Annual Reports



4.3.2. Points of contact

In accordance with the European legislation⁴⁸, the number of points of contact should be established on the territory closely linked to the needs of users. Those units may be managed directly by postal operators (postal establishments), by third parties (such as retail stores...) or correspond to services directly provided by the mailman. Considering all these, Member States should ensure that sufficient points of contact are established, taking into account the users' needs in order to satisfy the universal service obligation. It is also important to ensure equal treatment of users in urban and rural areas, without prejudice of geographical conditions.

It is a difficult task to evaluate whether the density of access points or points of contact corresponds to the necessary equilibrium between the users' needs and the cost-efficient provision of the universal service. In some countries, post offices have an important social function and they are quite often seen as a last stronghold of the state in the small villages, which means that the density of the access points or points of contact is a particularly sensitive issue.

The answers regarding this indicator revealed that in 33 European states legal requirements/standards/obligations are enforced in order for USPs to ensure that an adequate number of postal establishments are provided. In the large majority of cases, the density of points of contact is established in the legislation or regulation by introducing multi-criteria in most cases (e.g. for each municipality at least one point of contact, distance to the point of contact, a minimum number of points of contact and % of the population coverage) or only one criterion in fewer cases.

The most important criteria introduced in the legislation or regulation in order of importance are the following:

- at least one point of contact per municipality;
- a maximum distance to the points of contact;
- a minimum number of points of contact;
- % coverage of the population;
- in relation to the users' needs;
- in relation to territory (km²).

⁴⁸ In Article 3, 2 of Directive 2008/06/EC: "Member States shall take steps to ensure that the density of the points of contact and of the access points takes account of the needs of users."



In 23 of the countries which have confirmed that they have requirements/standards in place, the requirements and standards are expressly provided by primary legislation. Special cases are Bulgaria, Iceland, Serbia and Slovenia, in which the criteria are defined by legislation in combination with a regulation/decision of the NRA. In FYROM, Ireland, Italy, Latvia, Malta, Portugal, Romania and Slovakia the criteria are fixed in the regulation or a decision of the NRA. In Belgium, it is rather the combination of legislation together with a management contract with the USP. The single special case in this situation is Hungary, in which the detailed rules for assuring the number of access points is regulated by way of contact between the State and the USP.

Overall, in the vast majority of European states, the NRA is usually the authority responsible for ensuring compliance with the requirements regarding an adequate number of postal establishments on the national territory except for the UK where the government is responsible for Post Office Limited, instead of Ofcom. The UK can be considered as a special case, given that the 'Post Office Limited', a separate autonomous business unit with no links to the USP, is the entity responsible for ensuring compliance with the requirements. The smaller subsidiary post offices are managed as 3rd franchises entities. In Hungary and Serbia, the NRAs are in charge of ensuring compliance with the requirements in collaboration with the Ministry. In Switzerland, the body responsible for ensuring compliance with the requirements regarding an adequate number of postal establishments on the national territory is an independent body, approved by the NRA.

In the majority of cases, the supervision is carried out by requiring information from the USP or by foreseen reporting by the USP and public information on the subject. In some cases the NRA also receive information coming from local authorities or NRAs also use geodata. Additionally, there are also combinations of the methods mentioned above. Furthermore, almost 80% of the respondents indicated they have a system of sanctions in place in case of non-compliance with the requirements in an adequate number of postal establishments. In most of these cases, the competent authority could resort to fines/penalties or perform a regulatory action, e.g. administrative or legal sanctions. In Cyprus and Estonia, the NRA can impose requirements to open additional points of contact.

NRAs have the power to prevent closure of postal establishments in 14 European countries (Austria, Belgium⁴⁹, Bulgaria, Croatia, the Czech Republic, Estonia, FYROM, Iceland, Italy, Latvia, Malta, Serbia, Slovakia and Slovenia). Other NRAs are not empowered with this (Denmark, Finland, France, Germany, Ireland, Latvia, Netherlands, Norway, Poland, Portugal, Romania and Switzerland).

Additionally, care for disabled persons has been kept in mind in some countries as postal points of contact should be accessible to all users, including disabled persons. The large majority of

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⁴⁹ If not in line with the specifications of the Management Contract between bpost and the State regarding Services of General Economic Interest.



respondents answered that they do not have data available on this matter but, despite this, it should be highlighted that in 7 European states (one more than last year) all or almost all postal points of contact are equipped for helping disabled persons (the Czech Republic, Denmark, Finland, Luxembourg, Poland, Slovakia and Switzerland), with the observation that, in the Czech Republic and Switzerland, it is mandatory by legislation for all postal establishments to be equipped with access for disabled persons. Another 5 respondents reported percentages in this: Belgium – 88%, Iceland – 75%, Italy – 70%, Hungary – 38% and Slovakia – 29%.

Furthermore, information has been collected regarding the evolution of the number of points of contacts per country since 2008. Where the data for 2008 were not available, the oldest data available were used.

The figures below show the percentage change in the number of points of contacts per country from 2015 to 2016 (1 year evolution) and from 2008 to 2016 (8 years evolution). The table with absolute values of the number of points of contacts per country can be found in Annex 7.

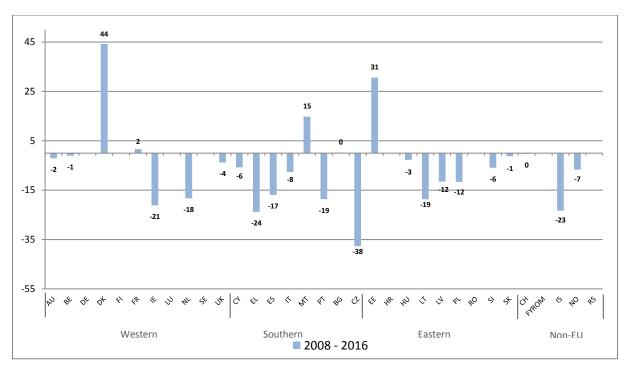
70,00 60,00 50,00 40,00 30,00 20,00 10,00 5.01 2.94 3.37 1.68 0.39 0,00 0.00 0.00 0.00 0,00 -0.16 -2.14 -1.11_{-2.61</sup>-2.32} -0.39 -0.27 -0.39 -0.36-0.23 -1.56 -10,00 -20,00 1/4 Southern Western Eastern Non-EU 2016 - 2015

Figure 19 – Percentage change in the number of points of contacts per countries in 2016 compared with the situation in 2015

In Estonia, the number of points of contacts increased enormously in 2016 compared with 2015. In two third of the countries we notice a decrease in the number of points of contacts, but in one third of the countries we see an increase.



Figure 20 – Percentage change in the number of points of contact per countries in 2016 compared with the situation in 2008



Note: Where the data for 2008 were not available, the oldest data available were used.

If we look at the 8 year perspective, we notice that in the majority of countries there is a decrease in points of contact, except in Bulgaria, Denmark, Estonia, France and Malta where we have an increase. In two countries (the Czech Republic and Iceland) more than one third of the points of contacts has disappeared over the last 8 years. Compared with the number of collection letterboxes, the situation has not changed so drastically. In general, we notice a decline in the number of points of contacts in a range from 0 to 20% over the last 8 years. In 12 countries the situation has remained quite stable (change of less than 10%), namely Austria, Belgium, Bulgaria, Cyprus, France, Hungary, Italy, Norway, Slovenia, Slovakia, Switzerland and the UK.

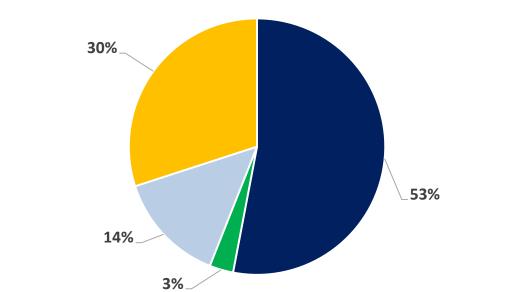
The figure below illustrates the distribution of points of contact in each country in 2016. The table with absolute values of the number of types of points of contacts per country is in Annex 8.

The most common type of point of contact at the European level, based only on the information received from the responding countries, remains access to a permanent post office with or without a full range of services (53%) followed by post agencies managed by 3rd parties (30%). The answers received concerning the 2016 questionnaires revealed that the number of points of contact represented by postmen of the USPs is still quite considerable (14%).



Figure 21- Proportion of points of contact by type in 2016

■ Permanent PO



Postman

Postal Agency 3rd Entity

Percentage by types of points of contact managed by the USP

Compared with previous year the situation is quite stable. The most commonly used point of contact is still the permanent post offices managed by the USP with full or limited range of services (53%) followed by the permanent post agencies managed by a 3rd entity (30%) and finally postmen are still delivering basic or full services to customers at the door (14%). Of course the situation varies very strong depending on the country as you have countries with exclusive permanent post offices managed by the USP unlike some countries which have much more permanent post agencies managed by a 3rd entity.

■ Mobile PO & Seasonal PO

Regarding the range of services offered by the postal agencies managed by a 3rd entity, 12 respondents answered that they are offering the full range of services (Austria, Denmark, France⁵⁰, Germany, Ireland, Iceland, Norway, Poland, Portugal⁵¹, Serbia, Sweden and Switzerland). In Greece, Latvia, Malta and Romania, the postal agencies offer basic services. In Estonia, Lithuania, Luxembourg, Slovenia and Slovakia the services offered are only within the scope of the universal service. In Hungary post agencies managed by 3rd entities offer full range of universal services but other postal services are offered via the contract between the USP and the 3rd entity.

⁵⁰ In France they offering main postal services but not necessarily a full range of services

 $^{^{\}rm 51}$ In Portugal not all postal agencies managed by a ${\rm 3^{rd}}$ entity offer the full range of services

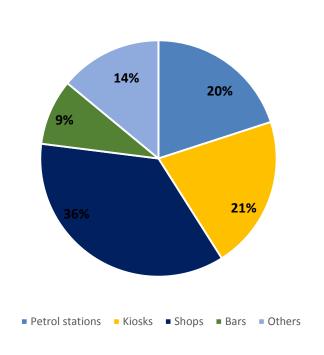


The cases of the Czech Republic, Germany and the Netherlands are worth noting, where the services offered by postal agencies managed by a 3rd entity depend as some postal agencies have a full range of services and other have a limited ranges of services.

With the exception of Belgium, FYROM, Iceland and Malta (where the postal agencies managed by a 3rd entity are situated mainly in the urban areas), the large majority of NRAs answered that in their case these agencies are situated mostly in rural areas (Austria, Cyprus, the Czech Republic, Estonia, France, Hungary, Iceland, Romania, Slovakia and Switzerland). Despite this, in Denmark, Finland, Germany, Greece, Ireland, Latvia, Luxembourg, Norway, Poland, Portugal, Serbia, Sweden, Switzerland and the UK, this kind of agency is also situated in rural and urban areas.

Regarding the postal agencies managed by 3rd entities, the answers provided by the respondent countries showed that these are mainly located in shops and food stores (25 answers), followed by kiosks (15 answers), petrol stations (14 answers) and bars (6 answers). In Austria, Belgium, the Czech Republic, France, Portugal, Slovakia and Switzerland, you can also find postal agencies inside municipal administrations or parishes. The figure below illustrates the location of postal agencies managed by third parties.

Figure 22 – Location of post agencies managed by 3rd parties in percentages in 2015



Compared with previous year the situation is almost identical.





Finally, we can conclude that in the vast majority of countries that provided data on the number of points of contacts, we have found that in general there is a decrease in the number of points of contact as 17 countries have a decrease in points of contact whereas 9 countries report an increase in points of contact. In general terms, we can conclude that the situation is quite stable as in the vast majority of countries the changes are very limited, within a range of 2%.



4.4 Monitoring of consumer satisfaction

According to the responses to the 2016 questionnaire, around 39% of the NRAs monitor indicators of consumer satisfaction in their country and almost all of these publish the respective results. In annex 9 you will find further information on how NRAs monitor consumer satisfaction and links where the published information can be found. The number of NRAs monitoring consumer satisfaction seems to be decreasing, since two less NRAs indicated to do so in 2016 when compared with 2015.

In 36% of the countries the USP monitors consumer satisfaction, more or less the same situation as portrayed last year, but the majority of NRAs indicated not to have information regarding this issue.

The figure below highlights the overall situation regarding the monitoring of consumer satisfaction in Europe, in 2016.

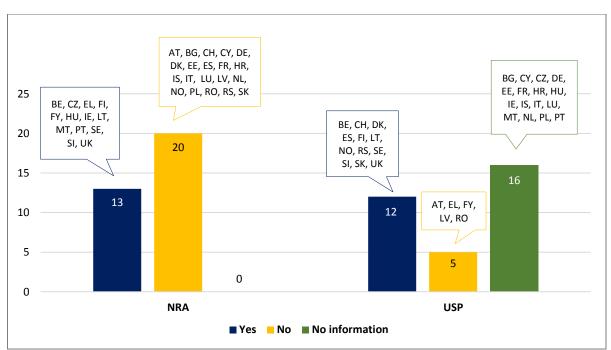


Figure 23 - Monitoring of consumer satisfaction conducted by NRAs and USPs in 2016



4.5 Surveys regarding customers' needs

The situation in terms of surveys regarding customers' needs and market surveys has remained consistent for the past three years, with 52% of the NRAs indicating that they conduct such surveys and most of them publishing the results. The regularity of these surveys varies a lot per NRA and they are mostly carried out on an ad hoc basis to serve regulatory needs. In the annexes you will find further information on the way NRAs conduct these surveys and links where the information published can be found.

Only 18% of NRAs indicated that the USP conducts surveys regarding customers' needs, but the large majority of respondent NRAs do not have information regarding this issue.

The figure below highlights the overall situation regarding the monitoring of customers' needs in Europe, in 2016.

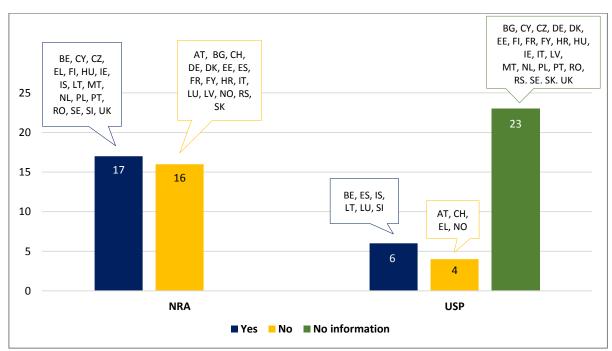


Figure 24 – Surveys on customers' needs conducted by NRAs and USPs in 2016



5. CURRENT SITUATION REGARDING THE ASSESSMENT OF CONSUMER PROTECTION AND COMPLAINT HANDLING PROCEDURES

The complaint handling and consumer protection questionnaire results have been analysed from the following five perspectives:

- 5.1 competence of NRAs on complaint handling;
- 5.2 information provision and access to complaint handling and dispute resolution;
- 5.3 compensation schemes for individual customers;
- 5.4 indicators on complaints
- 5.5 data on complaints by NRAs.

5.1. Competence of NRAs on complaint handling

This subchapter evaluates the scope and competence of the NRAs in handling users' complaints about postal services.

The number of NRAs indicating to be responsible for dealing with users' complaints has been decreasing for the last three years – 28 in 2014, 26 in 2015 and 25 in 2016. Nevertheless, in the large majority of countries (78%) NRAs have this competence, most of which covering complaints about all postal services.

Almost all of the countries (21⁵²) where NRAs are responsible for dealing with users' complaints have procedures in place to resolve those complaints.

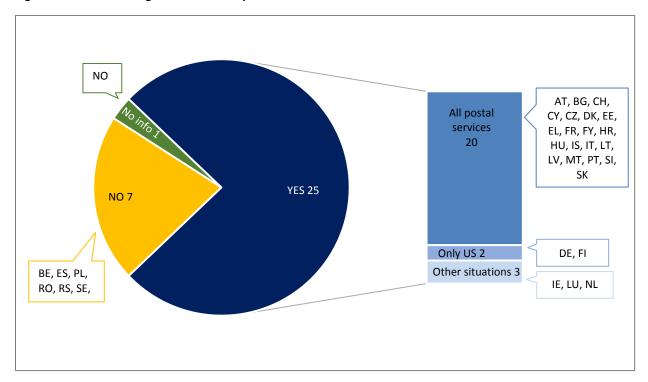
_

 $^{^{52}}$ AT, BG, CH, CY, CZ, EL, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, NL, SI, SK.



The figure below shows the situation regarding the competence and respective scope of the NRAs in complaint handling in 2016.

Figure 25 – NRAs dealing with users' complaints in 2016





5.2. Information provision and access to complaint handling and dispute resolution

This subchapter analyses the information available to users on complaint handling procedures, redress schemes and means of dispute resolution, while also looking at the existence of regulation regarding complaints handling and of alternative dispute resolution schemes.

The figure below indicates that in 2016 the majority of countries had obligations in place for postal service providers to publish information regarding procedures to complain, compensation schemes and dispute resolution (usually on the providers' website, access points, general terms and conditions), covering the USP in most situations. More countries seem to be imposing obligations in what regards information about disputes resolution, an increase occurred regarding all postal service providers.

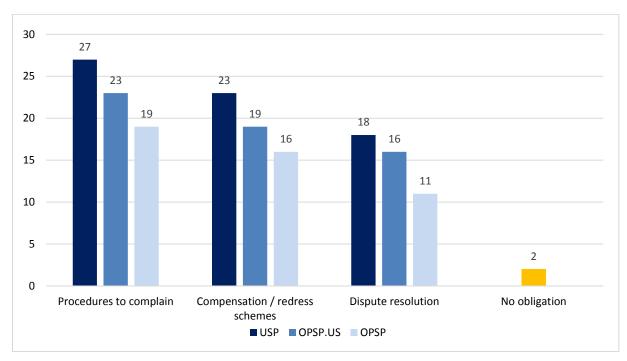


Figure 26 – Obligations to provide information about complaints handling in 2016

Note: The list of countries where postal service providers are obliged to provide information is available in the appendices (annex 10).

Focusing on the regulation of complaint handling procedures, the situation has remained more or less the same for the past few years with most NRAs (76%) indicating that such regulation exists (BE, BG, CZ, DK, EL, ES, FI, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, PL, PT, RO, RS, SI, SK, UK), one less than in 2015. In 17 countries, 3 more than in 2015, the existing regulation covers all postal service providers. Also in the majority of the countries at least the principles of complaint handling procedures and deadlines are regulated.



For the last three years, the number of countries where alternative (or out-of-court) dispute resolution mechanisms are available has been increasing – 22 in 2014, 27 in 2015 and 29 in 2016. Six more NRAs are declaring to have voluntary mechanisms instead of mandatory ones.

BE, FY, LT, NO, PT, UK Mandatory 6 Voluntary AT, BG, CH, 23 CZ, DE, DK, EE, EI, ES, FI, **YES 29** NO 4 FR, HU, IE, IT, LU, LV, MT, NL, PL, RO, SE, SI, SK CY, HR, IS, RS

Figure 27 - Alternative (or out-of-court) dispute resolution in 2016

Finally, turning to the implementation of the CEN standard EN 14012: 2008, in 2016, 16 countries (BE, CH, FR, HR, HU, IS, LT, MT, NL, PL, PT, RS, SE, SI, SK, UK) indicated that the USP has implemented this standard, in some cases only partly and not resulting from NRAs' determinations – 2 more countries than in 2015. There is no information about the implementation of this standard by other postal service providers.



5.3. Compensation schemes for individual customers

This subchapter looks at the existing compensation schemes for individual customers, focusing on their framework, scope and disclosure.

As indicated in the figure below, the majority of the countries (67%) have such an obligation covering the USP. Nevertheless, fewer NRAs indicated to have such an obligation for the USP (1 less than in 2015).

When asked to explain why there is no obligation on this matter, the countries that were in this situation mentioned as main reasons the lack of justification in legislation, the lack of need or the fact that this subject is covered by general terms and conditions and civil law.

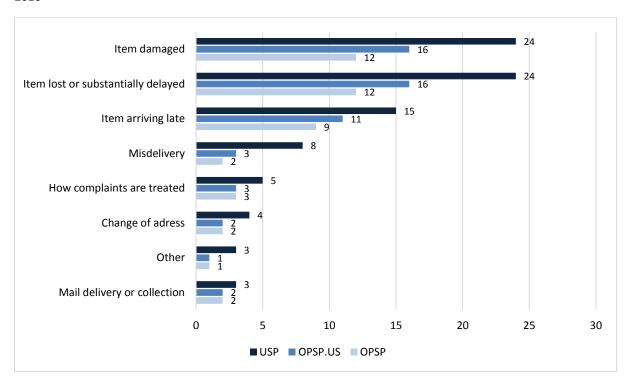
BG, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LU, LV, MT, PL, PT, RO, RS, USP SI, SK, UK 22 BG, EL, FR, HR, HU, IE, IT, **YES 22** NO 10 OPSP.US LT, LU, LV, PL, RO, RS, SI, SK 15 BG, EL, FR, HR, **OPSP** HU, IE, IT, LU, AT, BE, CH, LV, PL, RO, RS, CY, CZ, DE, SI, SK EE, NL, NO, SE

Figure 28 – Mandatory compensation schemes for individual customers in 2016



As to types of service failures covered by existing compensation schemes, figure 29 shows that in the large majority of countries (72%) these schemes cover, for the USP, at least items damaged and items lost or substantially delayed. This situation is more or less the same when compared with the 2015 data, but the coverage of misdelivery and how complaints are treated has increased in what regards the USP. The overall coverage of subjects regarding other postal services providers seems to be decreasing when compared with the data collected in 2015.

Figure 29 – Coverage of existing compensation schemes for individual customers per type of service failure in 2016



Note: The list of countries per postal service provider and type of service failure covered is available in the appendices (annex 11).



5.4. Indicators on complaints

This new chapter focuses on the measurement and publication of complaints handling indicators by the USP, analysing existing obligations and their scope.

In the majority of countries (67%), USPs are obliged to measure and/or publish indicators on the complaints they receive. This obligation is normally set by the postal law, but in some cases is derived from licence conditions or NRAs determinations. In most cases (77%) the existing obligations determine both the measurement and publication of the indicators that are set. These indicators usually include the number of complaints received, the number of justified complaints and the number of complaints that originated compensations and in fewer situations also include the number of answered complaints or the way they were solved and average response times.

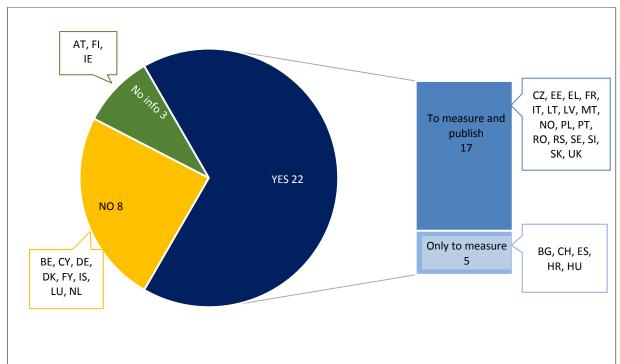


Figure 30 – Obligation to measure and publish indicators on complaints in 2016



5.5. Data on complaints by NRAs

This subchapter looks at the data that NRAs are collecting on the number of complaints about postal services in general and, in particular, about cross-border services. Furthermore, the data on the number of complaints collected by NRAs is also published.

5.5.1. Collection of data by NRAs

In what regards the collection of data on complaints received by the USP regarding universal services, there are no significant changes from the situation portrayed in the last few years. The vast majority of NRAs (79%) collect this data, most also do so by category.

Fewer NRAs are indicating to collect data about non-universal services and also about complaints received by other postal services regarding universal service or not, which has been noticed also last year.

Figure 31 highlights the situation regarding the collection of data by NRAs on the number of complaints received by postal service providers.

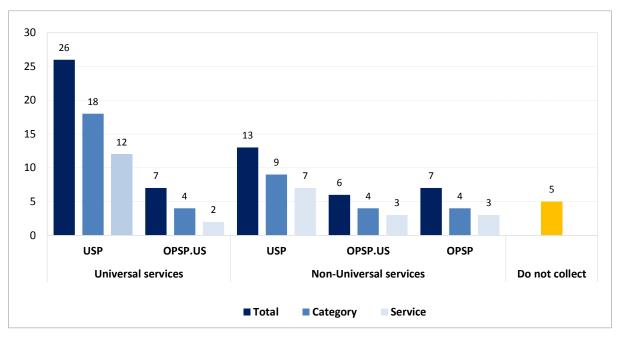


Figure 31 – Collection of data by NRAs on the number of complaints in 2016

Note: The list of countries where NRAs collect data on complaints and from which postal service providers is available in the appendices (annex 12.1.).



The figure below focuses on the collection of data by NRAs regarding the number of complaints received by postal service providers and the NRA about cross-border services, highlighting that most NRAs are collecting data on complaints received by the USP.

More NRAs are collecting the number of complaints received by the NRA and by other postal service providers, while the situation regarding complaints received by USPs remained more or less the same when compared with the previous year.

Most NRAs mentioned items lost, damage or substantially delayed as the main reasons for cross-border complaints in 2016.

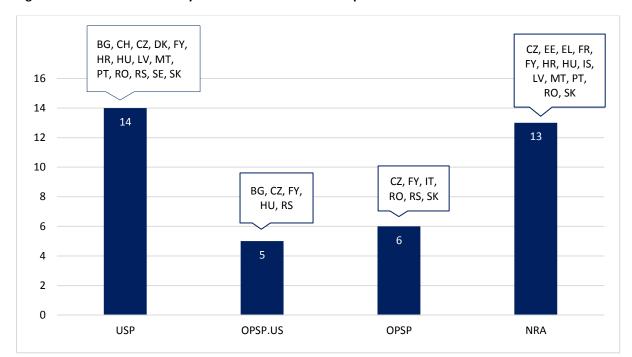


Figure 32 - Collection of data by NRAs on the number of complaints about cross-border services in 2016

5.5.2. Complaints on postal services collected by NRAs

The figures in this chapter show data on the number of complaints received by USPs and by NRAs between 2014 and 2016 per country and per number of inhabitants in each country⁵³. Data on the number of complaints received by USPs about cross-border service complaints is also shown.

When analysing this data, it should be taken into consideration that comparisons between the numbers presented by the countries may reflect differences in the legal and regulatory frameworks, market volumes/structure, as well as cultural aspects. For instance, in some countries end-users may

The information on the population of each country that was used is available at http://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&pcode=tps00001&plugin=1.



have to address their complaints first to the service provider before submitting it to the NRA while in others they are able to reach the NRA in first or second instance (depending on these particularities, numbers on complaints may overlap). These and other aspects may have a significant impact on the number of complaints that postal service providers and NRAs receive. It should also be kept in mind that the numbers provided by NRAs may have differences in scope. For instance, some may consider only written complaints while others may include only justified complaints.

The figure below shows the complaints received by USPs about universal service per country per 1,000 inhabitants. The complaints rate ranged in 2016 from 23.02 (Iceland) to 0.06 (Serbia). The overall complaints rate has again increased from 2015 to 2016 (7.65 complaints per 1000 inhabitants in 2015 and 8.58 in 2016). When considering the geographic clusters, the overall complaints rate is higher within Western countries (14.55 complaints per 1,000 inhabitants) and much lower in Eastern countries (5.12) and Southern countries (2.75) in 2016.

30 23.02 25 20 13.26 15 10 5 0 MT PT DK FR ΙE SE UK EL ES IT BG CZ HR HU LV PL SI SK IS NO Outside EU Weastern Southern Eastern **■ 2014 ■ 2015 ■ 2016**

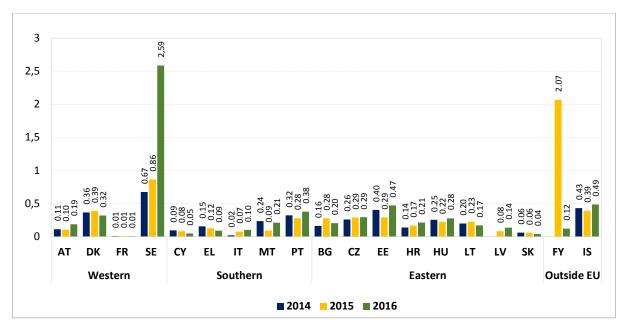
Figure 33 – Complaints received by USPs about universal service per country per 1,000 inhabitants, 2014-2016

Note: The number of complaints received by USPs and the population per country are included in the appendices (annex 11.2.). In the case of the Portuguese USP, the values refer to complaints answered by the USP

The figure below shows complaints received by NRAs about postal services per country per 10,000 inhabitants. In 2016, the complaints rate ranged from 2.59 (Sweden) to 0.01 (France). The overall complaints rate has increased (0.16 complaints per 10,000 inhabitants in 2015 and 0.23 in 2016). When considering the geographic clusters, Western countries show an overall higher complaints rate (0.32) when compared with Eastern countries (0.22) and Southern countries (0.13).



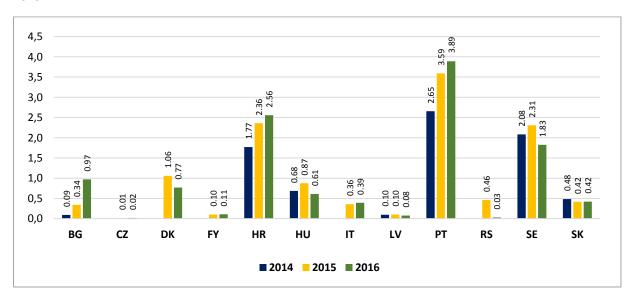
Figure 34 – Complaints received by NRAs about postal services per country per 10,000 inhabitants, 2014-2016



Note: The number of complaints received by NRAs and the population per country are figured in the appendices (annex 11.3.).

In turn, the figure below shows complaints received by USPs about cross-border services per country per 1,000 inhabitants. The complaints ranged in 2016 from 3.89 (Portugal) to 0.02 (the Czech Republic). There is a split even between countries that show an increase in the number of complaints about cross-border services and countries that show a decrease in what regards the 2015-2016 period. The overall complaints rate, considering the data available, has remained almost the same, with a slight decrease from 2015 (0.85) to 2016 (0.84).

Figure 35 – Complaints received by USPs about cross-border services per country per 1,000 inhabitants, 2014-2016



Note: The number of complaints received by USPs and the population per country are included in the appendices (annex 11.4.). In the case of the Portuguese USP, the values refer to complaints answered by the USP



ANNEXES

Annex 1 - Methodology of each country for the measurement of quality of service of domestic services provided by the USP in 2016

Services	Standards	Count	Country	%
Single-piece priority mail	EN 13850	29	AT, BE, BG, CH, CY, CZ, DE, EL, ES, FI, FR, HR, HU, IE, IS, IT, LT, LV, MT, NL, NO, PL, PT, RO, RS, SE, SI, SK, UK	88%
	Other	1	EE	3%
	EN 13850	6	AT, FI, FR, IS, LT, NO	18%
Single-piece non-priority mail	EN 14508	10	BE, BG, CH, HR, HU, IT, PL, PT, SK, UK	30%
	Other	1	LV	3%
Dulle medil	EN 14534	3	FR, HU, MT	9%
Bulk mail	EN 13850	1	ES	3%
	EN 13850	6	BG, DK, LT, NO, SK, UK	18%
	TR 15472	4	BE, MT, PL, SI	12%
Parcels	EN 14508	2	FY, UK	6%
raiceis	Other	7	CH, ES ⁵⁴ , FR ⁵⁵ , HU, PT ⁵⁶ , RO ⁵⁷ , RS	21%
	EN 13850	3	AT, LT, PT	9%
	TR 15472	1	BE	3%
Registered mail	EN 14508	1	SK	3%
	EN 14137	1	MT	3%
	Other	2	FR ⁵⁸ , HU	6%
Cross border mail	Methodology based on EN 13850	15	AT, BG, CY, EE, FR, HR, HU, IS, IT, LT, LU, MT, RO, RS, SI	45%
	Other	2	CH ⁵⁹ , PT ⁶⁰ ,	6%

No standard used

55 Methodology based on a track and trace system.

56 The measurement is based on a sample of real mail items (parcels), selected according to their real mail flows.

57 Procedure established by the NRA

⁵⁸ Methodology based on a track and trace system.
59 Confidential

⁶⁰ Standard used by IPC



Annex $\mathbf{2}$ – Force majeure and other exceptions which have an impact on the measurement of quality of service

2.1 Number of days of measurement impacted by force majeure events in 2016 and reasons

Country	Number of days accepted by the NRA	Geographical area affected	Reasons	Number of days denied by the NRA	
ВЕ	15	National	Bomb alerts, terror attacks, strikes, weather conditions	2	
BG	0	-	-	0	
СН	Confidential	Regional	-	-	
CY	-	-	-	-	
EL	2	National	National general strikes in the public/private sector	8	
ES	0	-	-	-	
HR	-	Regional	Geographical specificities of the Croatian territory	-	
HU	0	-	-	0	
IE	-	-	-	-	
IS	-	National	-	-	
IT	2-6	Regional	Earthquake	-	
LT	-	-	-	-	
MT	0	-	-	0	
NO	-	National	-	0	
PL	-	-	-	-	
PT	0	-	-	-	
RO	-	-	-	-	
RS	-	-	-	-	
SI	1	National	Fire in post center LJ at 21 July	0	
SK	0	-	-	0	



2.2 Other exceptions that have an impact on the measurement of the quality of service in 2016

Country	Exceptions
BE	During three weeks in the Christmas period, the USP is allowed to exempt Christmas stamps (with a delivery speed of D+3 instead of the standard D+1), from the quality measurement system. In case consumers use these Christmas stamps outside the Christmas period, they will be valid and included in the quality measurement system. The consumers have to be well informed and the standard D+1 stamp should always be available as an alternative to this Christmas stamp.
EE	National holidays and public holidays; in case of an island which does not have a regular ferry, boat or flight connection which allows delivery of a postal item with the prescribed frequency. On holiday there is no collection or delivery, in case of an island the collection and delivery are linked with the frequency of connections.
EL	Official or local holidays are normally deducted during the calculation of quality measurements on any given time period.
NO	First day after Easter.
PL	 The postal operator is liable for non-performance or inadequate performance of postal services, unless non-performance or inadequate performance results from: Force majeure; Reasons on the part of the sender or addressee, not caused by the postal operator's fault; Contravention by the sender or addressee of the Act or rules and regulations for the provision of postal services or universal services; Properties of a sent item. In addition, the designated operator is liable for non-performance or inadequate performance of universal services, unless non-performance or inadequate performance results from the strike of that operator's employees held in accordance with the applicable provisions. Nevertheless there were neither force majeure events nor strikes last year.
UK	Exemption for Christmas period – First Monday in December to the day after New Year's Day in January.



Annex 3 – Data regarding quality of service measurement and audit in 2016

3.1 Information about measurement and audit regarding transit time of single-piece priority mail

	Who commissions or orders the measurement?	Who pays for the measurement?	Is the measurement audited?	Who is responsible for ensuring the audit
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
BG	NRA	NRA	-	-
СН	NRA	USP	Yes	Other
CY ⁶¹	USP	USP	Yes	USP
CZ	USP	USP	Yes	NRA
DE	USP	USP	Yes	USP
DK	-	-	-	-
EE	USP	USP	No	-
EL	NRA	NRA	Yes	NRA
ES	USP	USP	Yes	NRA
FI	NRA	USP	Yes	-
FR	USP	USP	Yes	NRA and USP
HR	USP	USP	Yes	NRA
HU	USP	USP	Yes	USP
IE	NRA	NRA	Yes	Other
IS	NRA	USP	Yes	Other
IT	NRA	USP	Yes	USP
LT	USP	USP	Yes	-
LU	USP	USP	Yes	Other
LV	USP	USP	Yes	USP
MT	USP	USP	Yes	NRA
NL	USP	USP	Yes	USP
NO	USP	USP	-	Other
PL	NRA	NRA	Yes	NRA
PT	USP	USP	Yes	NRA
RO	USP	USP	Yes	USP
RS	NRA	USP	No	-
SE	USP	USP	Yes	Other
SI	USP	USP	Yes	NRA
SK	USP	USP	Yes	NRA
UK	USP	USP	Yes	NRA
Total of yes	-	-	27	-

Note: considering countries for which single-piece priority mail is applicable and that have a measurement.

 $^{^{61}}$ The NRA makes sure both the measurements and the audits are done in accordance with the standard EN 13850



3.2 Information about measurement and audit regarding transit time of single-piece non-priority mail

	Who commissions or orders the measurement?	Who pays for the measurement?	Is the measurement audited?	Who is responsible for ensuring the audit
BE	USP	USP	Yes	NRA
BG	-	-	-	-
СН	NRA	USP	Yes	Other
DK	NRA	USP	No	-
FI	NRA	USP	Yes	-
FR	USP	USP	Yes	NRA and USP
FY	NRA	NRA	No	USP
HR	USP	USP	Yes	NRA
HU	USP	USP	Yes	USP
IS	NRA	USP	Yes	Other
IT	NRA	USP	Yes	NRA
LT	USP	USP	No	-
LU	USP	USP	Yes	Other
LV	NRA	NRA	Yes	NRA
NO	-	-	-	-
PL	NRA	NRA	Yes	NRA
PT	USP	USP	Yes	NRA
SK	-	-	-	-
UK	USP	USP	Yes	NRA
Total of yes	-	-	13	-

Note: considering countries for which single-piece non-priority mail is applicable and that have a measurement.



3.3 Information about measurement and audit regarding transit time of registered mail

	Who commissions or orders the measurement?	Who pays for the measurement?	Is the measurement audited?	Who is responsible for ensuring the audit
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
DE	USP	USP	Yes	USP
FR	USP	USP	Yes	_62
HU	USP	USP	Yes	USP
IT	NRA	USP	Yes	USP
LT	USP	USP	No	-
LU	USP	USP	Yes	Other
MT	USP	USP	No	-
PT	USP	USP	Yes	NRA
SK	-	-	-	-
UK	USP	USP	Yes	NRA
Total of yes	-	-	9	-

Note: considering countries for which registered mail is applicable and that have a measurement

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 $[\]overline{^{62}}$ The last audit was commissioned by the NRA.



3.4 Information about measurement and audit regarding transit time of single-piece parcels

	Who commissions or orders the measurement?	Who pays for the measurement?	Is the measurement audited?	Who is responsible for ensuring the audit
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
BG	NRA	NRA	-	-
СН	NRA	USP	Yes	Other
DK	USP	USP	No	-
ES	USP	USP	Yes	NRA
FR	USP	USP	Yes	_63
HU	USP	USP	No	-
IT	NRA	USP	Yes	USP
LT	USP	USP	No	-
LV	NRA	NRA	Yes	NRA
MT	USP	USP	No	-
NO	USP	USP	Yes	Other
PL	NRA	NRA for audit and USP for measurement	Yes	NRA
PT	USP	USP	Yes	NRA
RO	USP	USP	No	USP
RS	NRA	USP	No	-
SI	USP	USP	Yes	NRA
SK ⁶⁴	USP	USP	No	NRA
UK	USP	USP	Yes	NRA
Total of yes	-	-	12	-

Note: considering countries for which single-piece parcel is applicable and that have a measurement

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 ⁶³ The last audit was commissioned by the NRA
 ⁶⁴ The NRA plans to audit the measurement.



3.5 Information about measurement and audit regarding transit time of cross-border mail

	Who commissions or orders the measurement?	Who pays for the measurement?	Is the measurement audited?	Who is responsible for ensuring the audit
AT	USP	USP	Yes	NRA
BE	Other	Other	Yes	Other
BG	USP takes part each year in the UNEX measurement	USP	Yes	Other
СН	Confidential	Confidential	Confidential	Confidential
CY	USP	USP	Yes	USP
EE	USP	USP	No	-
FR	USP	-	No	-
HR	USP	USP	No	NRA
HU	USP	USP	Yes	Other
IS	NRA	USP	Yes	Other
IT	Other	USP	Yes	Other
LU	Other	-	Yes	-
MT	USP	USP	No	NRA
PT ⁶⁵	USP	Other	Yes	NRA
RO	USP	USP	Yes	Other
RS	-	USP	No	-
SI	USP	USP	-	-
Total of yes	-	-	10	-

Note: considering countries that have a measurement

⁶⁵ The audit promoted by the NRA only covers the calculation made by the USP (based on the information provided by IPC) and reported to ANACOM. This audit does not cover the measurement itself.



Annex 4 – Countries in which the criteria establishing the exceptional geographical character are both defined and published

Austria: Postal Market Act, Section 10: https://www.rtr.at/en/post/PMG; https://www.rtr.at/en/post/PKS_Land

Czech Republic: The criteria are set by secondary legislation that is freely accessible, but not on the website.

Greece:

http://www.eett.gr/opencms/export/sites/default/admin/downloads/PostLegalFramework/AP710-019 144104062014.pdf

Slovakia: http://www.teleoff.gov.sk/data/files/39921.pdf

Slovenia: http://www.akos-rs.si/univerzalna-storitev

Spain: https://www.cnmc.es/ambitos-de-actuacion/postal/entornos-especiales

Switzerland: www.postcom.admin.ch



Annex 5 - Implementation Decision Agcom number 395/15/Cons

The first phase of the new delivery model started on 1 October 2015, covering 256 municipalities, distributed in 4 regions and affected the 0.6% of the national population.

The second phase of implementation started on April 4, 2016, involving 2,393 municipalities distributed over 15 regions. This phase combined with the first one involved in total 12% of the national population.

The start of the third and final phase scheduled for February 2017 should have involved approximately 23.2% of the population, but Poste Italiane has not implemented it yet.

Since the implementation model started, Agcom received about 20 complaints by the Mayors of the concerned municipalities. As a result of these complaints, Agcom promptly asked Poste Italiane to restore the quality levels of the service.

Decision n. 395/15/CONS abstract

In case of exceptional circumstances in terms of infrastructure or geography, the Italian Postal Act allows Agcom to reduce the frequency of universal service provision (minimum five days per week), authorizing alternate day collection and delivery in depopulated areas (less of 200 inhabitants per km²).

In order to assess decreasing volumes, changing needs of postal users and the sustainability of the universal service, the Financial Act of December 23, 2014 (article 1- 277) amended the Postal Act increasing from 12.5% to 25% the maximum share of the total population impacted by the alternate day scheme.

After receiving Poste Italiane's proposal to reduce the frequency of US provision, at the end of a large public consultation (postal operators, newspaper publishing company and Newspaper Publishers' Associations, over 130 municipalities) Agcom adopted decision n. 395/15/CONS, which authorizes and regulates the implementation of the alternate day collection and delivery scheme.

Alternate day scheme is applied to collection through post boxes and delivery in accordance with a bi-weekly Monday-Wednesday-Friday-Tuesday-Thursday schedule.

According to decision n. 395/15/CONS, the implementation of alternate day collection and delivery is allowed in municipalities with less than 30,000 inhabitants and less than 200 inhabitants per km² (or located in areas with less than 200 inhabitants per km²).

Moreover, to select municipalities presenting the exceptional circumstances legally required for the application of alternate day collection and delivery, one the following criteria must be fulfilled:

- average distance between street numbers (horizontal density of delivery points) > 81.7 metres;
- average recipients per street number (vertical density of delivery points) <1.4;
- percentage of commercial users <8%.

Poste Italiane must gradually implement the alternate day collection and delivery scheme during the following three stages:

- First stage: October 2015, ca. 0.6% national population impacted
- Second stage: April 2016, ca. 12.5% national population impacted
- Third stage: February 2017, ca. 23% national population impacted





Before each stage, Poste Italiane must provide detailed information to Agcom on revision of delivery network and estimated costs saving.

After each stage, Poste Italiane must submit to Agcom a detailed report on cost savings actually achieved and critical issues arising during the implementation. During the implementation stages, Agcom has the power to adopt corrective measures to assess any arising critical issue concerning users' rights and proper enjoyment of the universal service (including newspaper delivery) or the achievement of expected cost savings. Corrective measures may also be adopted to modify authorization conditions according to any comment made by the European Commission after Agcom decision's notification.

Poste Italiane should provide complete and transparent information to all users (30 days before) and the following entities (60 days before): Mayors of impacted municipalities, other postal operators delivering through Poste Italiane and publishing companies delivering newspapers through Poste Italiane.

To assess newspapers' readers specific needs, in his decision Agcom asked Poste Italiane to submit a commercial offer for daily publications and weekly periodicals postal distribution in those days of the week in which delivery through the alternate-day scheme is not available. The proposal must be fair and reasonable, devised to meet the sustainability criteria and must be consistent with the principle of affordable prices for end users.



Annex 6 – Absolute numbers regarding the evolution of the number of collection letterboxes in 2008, 2015 and 2016

	Number of collection letterboxes of the USPs				
Country	2008	2015	2016	Evolution 2015 vs 2016	
AT	20,000	15,544	15,340	Decrease	
BE	13,800 ⁶⁶	13,263	13,162	Decrease	
BG	5,286	4,814	4,714	Decrease	
СН	18,913	14,823	14,729	Decrease	
CY	953	911	811	Decrease	
CZ	23,746	21,698	21,535	Decrease	
DE	111,058	110,829	110,692	Decrease	
DK	10,250	7,400	7,000	Decrease	
EE	3,193	2,777	2,777	Unchanged	
EL	9,754	8,552	8,482	Decrease	
ES	na	25,187	25,304	Growth	
FI	na	6,600	6,100	Decrease	
FR	147,793	136,930	134,707	Decrease	
FYROM	na	359			
HR	5,051	3,121	3,101	Decrease	
HU	9,540	8,763	8,556	Decrease	
IE	4,800	5,700	5,700	Unchanged	
IS	230	193	191	Decrease	
IT	61,500	52,000	48,020	Decrease	
LT	2,981	1,687	1,670	Decrease	
LU	1,168	1,168		-	
LV	1,817	1,073	1,068	Decrease	
MT	468	468	468	Unchanged	
NL	20,000	18,000	17,000	Decrease	
NO	24,762	13,047	12,428	Decrease	
PL	52,396	22,838	18,488	Decrease	
PT	15,972	9,635	9,655	Unchanged	
RO	na	13,290	13,303	Growth	
RS	18,913	14,823	14,729	Decrease	
SE	29,128	23,478			
SI	3,054	2,296	2,293	Decrease	
SK	6,797	5,570	4,764	Decrease	
UK	118,500	118,500	118,500	Unchanged	

⁶⁶ Data of 2010



Annex 7 – Absolute numbers regarding the evolution of points of contact in 2008, 2015 and 2016

	Number	of points of o	contact of th	e USPs
Country	2008	2015	2016	Evolution 2015 vs 2016
AT	1,819	1,769	1,781	Growth
BE	1,351	1,344	1,337	Decrease
BG	5,401	5,431	5,410	Decrease
СН	3,500	3,499	3,491	Decrease
CY	1,160	1,093	1,093	Unchanged
CZ	11,079	6,923	6,904	Decrease
DE	na	13,169	13,023	Decrease
DK	751	1,112	1,083	Decrease
EE	418	328	546 ⁶⁷	Growth
EL	5,943	4,314	4,530	Growth
ES	9,926	8,946	8,247	Decrease
FI	na	863	843	Decrease
FR	16,862	17,075	17,133	Growth
FYROM	na	344	344	Unchanged
HR	na	1,016	1,016	Unchanged
HU	3,883	3,783	3,777	Decrease
IE	1,426	1,130	1,125	Decrease
IS	159	146	122	Decrease
IT	13,911	13,048	12,845	Decrease
LT	954	793	776	Decrease
LU	466			
LV	700	620	619	Decrease
MT	61	68	70	Growth
NL	2,085	2,047	1,704	Decrease
NO	3,187	2,878	2,975	Growth
PL	8,489	7,387	7,497	Growth
PT	2,873	2,330	2,339	Growth
RO	na	5,614	5,592	Growth
RS	na	1,491	1,516	Growth
SE	4,170	3,779		
SI	558	558	525	Decrease
SK	1,678	1,663	1,657	Decrease
UK	11,952	11,500	11,500	Unchanged

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⁶⁷ Including postmen this year



Annex 8 – Absolute numbers of points of contact by type in 2016

	Number of po	oints of conta	act by type in	2016	
Country	Permanent PO	Mobile& Seasonal	Postman USP	3rd entity	Other
AT	442	0	0	1,339	0
BE	Not yet	0	0	Not yet	0
BG	2,980	0	2,430	0	0
СН	1,323	0	1,319	849	0
CY	51	0	0	1042	0
CZ	2,984	0	3,593	327	0
DE	844	0	0	12,179	0
DK	3	0	0	1072	8
EE	149	0	226	171	0
EL	731	0	2,611	694	494
ES	2,395	0	5,852	0	0
FI	843	0	0	0	0
FR	8,835	0	0	8,298	0
FYROM	326	0		18	0
HR	1,009	7	0	0	0
HU	2,356	1,120	0	281	20
IE	50	0	0	1,075	0
IS	34	29	0	23	0
IT	12,845	0	0	0	0
LT	648	128	0	0	0
LU	0	0	0	0	0
LV	558	1	40	20	0
MT	40	2	0	28	0
NL	na	na	na	na	na
NO	33	0	1,624	1,318	0
PL	4,682	0	0	2815	0
PT	612	3	0	1,724	0
RO	5,592	0	na	0	0
RS	1,287	0	0	229	0
SE	5	0	?	?	0
SI	355	24	0	146	
SK	1,612	5	0	40	0
UK	0	0	0	0	0



Annex 9 – Monitoring of consumer satisfaction

Country	Surveys (periods and methodologies)
BE	The NRA performs a consumer satisfaction study every three years. The methodology used is a ten-point grading scale with which the consumers grade the USP for several services. They are published on a three-year basis. <a href="http://www.ibpt.be/en/operators/postal/universal-and-non-universal-postal-services/communication-of-17-december-2013-of-the-bipt-council-regarding-the-results-of-the-survey-of-july-august-2013-related-to-the-behaviour-and-priorities-of-private-and-business-users-about-the-universal-postal-service-in-belgium</th></tr><tr><th>EL</th><th>A consumer satisfaction survey is conducted only ad-hoc and not in a regular basis. A market survey to both individuals (retail) and business customers was conducted in 2011 regarding customer satisfaction and needs. A market research regarding issues that prohibit the development of the postal sector was conducted in 2012 among the major market players (providers, users and government) as well as a list of proposals was extracted to reinforce the postal market.</th></tr><tr><td>FI</td><td>Conducted yearly by the NRA.</td></tr><tr><td>FY</td><td>An independent company elected by the Postal Agency. http://www.ap.mk/resource/istrazuvanja/lstrazuvanje_zadovolstvo_mak_posta_2015.pdf
HU	Consultancy organization, survey, per some years.
IE	Monitored in the course of Postal Market Surveys conducted by the NRA. https://www.comreg.ie/industry/postal-regulation/research/
LT	Every two years the NRA conducts surveys on consumer needs/ satisfaction regarding postal services, availability of services. http://www.rrt.lt/lt/apzvalgos-ir-ataskaitos/rrt-uzsakymu-atliktu-ph6r.html
MT	By means of surveys carried out by the NRA every three years. http://mca.org.mt/articles/overview-households-perception-postal-services http://mca.org.mt/articles/mca-survey-results-local-postal-services http://mca.org.mt/articles/postal-services-large-bulk-mailers-survey-results
PL	Every 4 years a survey on demand for the universal service is conducted – in this sense we regularly monitor the indicators of consumer satisfaction. At the end of 2016, we ordered a survey on customers' needs that contained a part regarding consumer satisfaction. A similar survey was conducted in 2014, prior to appointing the designated operator.
PT	ANACOM collects consumer satisfaction indicators by type of service (priority, non-priority, parcels, express) and concerning also additional features (waiting time, location and number of postal establishments, accessibility for people with special needs, etc.). These indicators are collected through a survey carried out every two years by an external company (commissioned by ANACOM). Additionally, the two studies on users' needs, referred to the answer to question 6, also have information on consumer satisfaction. The latest results (field work - November 2016) are available via the following link: https://www.anacom.pt/render.jsp?contentId=1404532&languageId=1 .
RS	USP, twice a year (internal and external monitoring).
SE	Semi-annual survey of consumers. http://www.pts.se/upload/Rapporter/Post/2016/befolkningens-anvandning-posttjanster-2016-pts-er- 2016_6.pdf
SI	NRA has ordered on annual basis research on consumer satisfaction regarding postal services http://www.akos-rs.si/raziskave-o-zadovoljstvu-uporabnikov
SK	The NRA does not monitor consumer satisfaction, but the NRA imposes this obligation to the USP. Consumer satisfaction is measured by an independent body (research) yearly. Indicators (e.g.): adequacy of the fees, accessibility of the post office, opening hours, handling complaints, behaviour of employees, simplicity of the products, queuing time. http://www.teleoff.gov.sk/index.php?ID=8841
UK	Annual tracker research surveys.



Annex 10 – Surveys of customers' needs and market surveys

Country	Surveys (periods and methodologies)
BE	Consumer needs will be measured on a three-yearly basis, comprising both quantitative and qualitative
	research. Both residential as professional users are in the scope of the research.
	www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/communication-by-the-
	bipt-council-of-13-february-2017-on-an-overall-analysis-about-postal-needs-in-belgium
	http://www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/communication-by-
	the-bipt-council-of-7-february-2017-on-the-qualitative-survey-of-consumer-perceptions-within-the-
	<u>belgian-postal-market</u>
	http://www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/bipt-council-
	communication-of-22-december-2015-on-the-realisation-of-a-statistical-survey-and-analysis-regarding-
	the-preferences-the-needs-and-the-willingness-to-pay-of-domestic-private-and-professional-users-of-
	services-relating-to-the-universal-postal
CY	OCECPR conducts surveys regarding customer needs, as well as market surveys but there is no specific
	frequency. Below presented is the latest survey conducted in 2011
	http://www.ocecpr.org.cy/sites/default/files/ps_report_presentationconsumers_gr_05-03-2012_pt.ppt
CZ	The NRA made a first survey in the year 2016 for the review of the need to impose the obligation to ensure the
	US.
	https://www.ctu.cz/sites/default/files/obsah/ctu/vyzva-k-uplatneni-pripominek-k-zameru-ulozit-jako-
	povinnost-poskytovat-zajistovat-
	<u>jednotlive/obrazky/prezkumpodless37odst.4zakonaopostovnichsluzbach.pdf</u> (Only in Czech. The result of the survey and of the whole review is that it is necessary to impose the obligation to ensure the US in the
	current scope)
DK	In 2015, The Ministry of Transport, Building and Housing conducted a survey about the Danes' need for letters
	and parcels.
EL	Market surveys are conducted only ad-hoc and not on a regular basis.
	A study on e-commerce was completed in March 2015, regarding e-commerce users' preferences on parcel
	delivery services.
	http://www.eett.gr/opencms/export/sites/default/EETT_EN/Journalists/MarketAnalysis/MarketReview/PDFs/2014.pdf
HU	Consultancy organization, survey, per some years.
IE	We have monitored this in the course of our Postal Market Surveys.
	https://www.comreg.ie/industry/postal-regulation/research/
IS	Last survey was conducted in April 2012.
	https://www.innanrikisraduneyti.is/media/frettir-2013/2012-05-
LT	Every two years the NRA conducts surveys on consumer needs/satisfaction of postal services
	http://www.rrt.lt/lt/apzvalgos-ir-ataskaitos/rrt-uzsakymu-atliktu-ph6r.html
MT	By means of surveys carried out by the MCA every three years.
	http://mca.org.mt/articles/overview-households-perception-postal-services
NL	Article 33 of the Postal Act 2009 stipulates that the NRA systematically collects, analyses and processes
	information and data relating to the operation of the national market for postal services. ACM submits an
	annual report (Marktmonitor Post) on its findings to the Minister of Economic Affairs.
	A summary of the annual report is published on ACM's website:
	https://www.acm.nl/nl/publicaties/publicatie/17545/Posten-Pakkettenmonitor-2016/
	https://www.acm.nl/en/publications/publication/17561/More-parcels-and-less-mail-delivery-in-2016/
PL	We are obliged to regularly (every 4 years) conduct surveys on demand regarding the universal service. As
	mentioned before at the end of 2016, we ordered a survey on customers (individual and institutional) needs. A
	similar survey was conducted in 2014, prior to appointing the designated operator.
PT	ANACOM commissioned two studies in 2017 (conducted by an external company):
	1- Study on the needs of consumers of postal services (residential consumers), March 2017: see the executive
	summary (in English) at https://www.anacom.pt/render.jsp?contentId=1413422 ;
	2- Study on the needs of users in accessing postal establishments and other points of access to the postal
	network (residential users and Micro, small and medium sized enterprises), May 2017. See



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	https://www.anacom.pt/render.jsp?contentId=1413404. Additionally, a new survey on the use of postal services - residential population – was conducted in 2016 (this study is conducted periodically, every 2 years). The results (in English) are available at https://www.anacom.pt/render.jsp?contentId=1404531&languageId=1 .
RS	The NRA conducts every 2 or 3 years external independent surveys on customers' needs in cooperation with specialized marketing companies. Until 2016, we conducted four studies (2010, 2011, 2013, 2015) on the needs of users of universal postal service, entitled "Researching the Level of Need Fulfilment of Universal Postal Services Users". The survey covers issues relevant to the functioning of the postal market and the role of the main actors, in particular customers. http://rapus.ratel.rs/o-nama/projekti
SE	Concerning private consumers and small businesses. https://www.pts.se/upload/Rapporter/Post/2016/anvandares-behov-av-posttjanster-pts-er-2016_07.pdf
SI	Part of survey of users' satisfaction. http://www.akos-rs.si/raziskave-o-zadovoljstvu-uporabnikov
UK	As required. Last one published March 2013.



Annex 11 – Obligations to provide information

Countries where postal service providers are obliged to publish information on procedures to complain, compensation schemes and dispute resolution

	Universal Service Provider	Other Postal Service Providers active in the Universal Service area	Other Postal Service Providers		
Procedures to complain	BE, BG, CH, CY, CZ, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK	EE, EL, ES, FR, FY, HR,	FY, HR, HU, IE, IT, LT,		
Compensation schemes	BG, CY, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LV, MT, PL, PT, RO, RS, SI, SK, UK	FR, FY, HR, HU, IE, IT,	BG, CY, EL, FR, FY, HR, HU, IE, IT, LT, MT, PL, PT, RO, RS, SK		
Dispute resolution	BE, BG, CH, CY, CZ, DE, EE, EL, ES, FR, FY, IE, IT, LT, LV, PT, SI, UK	BE, BG, CY, CZ, DE, EL, FY, IE, IT, LT, PT			
No obligation	AT, NL				
No information	FI				



Annex 12 – Compensation schemes for individual customers

Countries that have compensation schemes for individual customers

	Universal Service Provider	Other Postal Service Providers active in the Universal Service area	Other Postal Service Providers		
Item lost or substantially delayed	BG, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LU, LT, LV, MT, NO, PL, PT, RO, RS, SI, SK, UK	BG, EE, EL, FR, FY, HR, HU, IE, IT, LT, LU, LV, NO, RO, SI, SK	BG, EL, FR, FY, HR, HU, IE, IT, LT, LV, RO, SK		
Item arriving late	BG, EL, FR, FY, HR, HU, IE, IT, LU, PL, PT, RS, SI, SK, UK	BG, EL, FR, FY, HR, HU, IE, IT, LU, SI, SK	BG, EL, FR, FY, HR, HU, IE, IT, SK		
Item damaged	BG, DK, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LU, LT, LV, MT, NO, PL, PT, RO, RS, SI, SK, UK	BG, EE, EL, FR, FY, HR, HU, IE, IT, LT, LU, LV, NO, RO, SI, SK	BG, EL, FR, FY, HR, HU, IE, IT, LT, LV, RO, SK		
Change of address	HU, IE, NO, UK	HU, IE	HU, IE		
Mail delivery or collection	IE, IT, UK	IE, IT	IE, IT		
Misdelivery	DK, ES, IE, IT, PT, RS, SI, UK	IE, IT, SI	IE, IT		
How complaints are treated	DK, IE, IT, RO, UK	IE, IT, RO	IE, IT, RO		
Other	BG, SK, UK SK		SK		
No existing schemes	BE, CH, CZ, SE				
No information	AT, CY, DE, FI, NL				



Annex 13 – Data on complaints

13.1 NRAs that collect data on the number of complaints received by postal service providers

		Universal Service Provider	Other Postal Service Providers active in the Universal Service area	Other Postal Service Providers			
		Yes	Yes	Yes			
Services	Total AT, BG, CH, CZ, DK, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LU, LV, MT, PL, PT, RO, RS, SE, SI, SK, UK		CZ, EL, IT, HU, LU, RO, SK				
About Universal Services	Category	CH, CZ, DK, EL, FR, HR, IE, IS, IT, LT, MT, PL, PT, RO, RS, SE, SI, UK	CZ, EL, IT, RO				
	Service	CH, DK, EL, FR, FY, IT, LT, LV, PT, RO, RS, SE	IT, RO				
Total Category Service		BG, CH, CZ, EL, FY, HU, IT, LT, PL, RO, RS, SI, SK	CZ, EL, FY, HU, IT, RO	CZ, EL, FY, IT, HU, RO, SK			
Non-Univ	Category	CH, CZ, EL, IT, LT, PL, RO, RS, SI	CZ, EL, IT, RO	CZ, EL, IT, RO			
About	Service	CH, EL, FY, IT, LT, RO, RS	FY, IT, RO	FY, IT, RO			
Do not collect		BE, CY, DE, EE, NL					
No information		FI					



13.2 Complaints received by USPs about universal service per country per 1,000 inhabitants, 2014-2016

	2014			2015		2016			
	USP complaints	Population	Per 1,000 inhabitant s	USP complaints	Population	Per 1,000 inhabitant s	USP complaints	Population	Per 1,000 inhabitant s
BG	685	7,245,677	009	2,437	7,153,784	0.34	7,031	7,202,198	0.98
CZ	115,419	10,512,419	10.98	119,844	10,553,843	11.36	116,005	10,538,275	11.01
DK	-	-	-	19,407	5,707,251	3.40	11,892	5,659,715	2.10
EL	12,618	10,926,807	1.15	11,004	10,783,748	1.02	15,772	10,858,018	1.45
ES	77,103	46,512,199	1.66	97,268	46,445,828	2.09	161,537	46,449,565	3.48
FR	873,834	65,889,148	13.26	1,160,552	66,759,950	17.38	1,367,279	66,488,186	20.56
FY		1	-	3,230	2,071,278	1.56	4,477	2,069,172	2.16
HR	30,574	4,246,809	7.20	35,609	4,190,669	8.50	42,119	4,225,316	9.97
HU	21,854	9,877,365	2.21	26,481	9,830,485	2.69	23,572	9,855,571	2.39
IE	22,290	4,605,501	4.84	23,169	4,724,720	4.90	22,341	4,628,949	4.83
IS							7,576	329,100	23.02
IT	85,230	60,782,668	1.40	70,582	60,665,551	1.16	72,624	60,795,612	1.19
LT	2,050	2,943,472	0.70	2,928	2,888,558	1.01	3,240	2,921,262	1.11
LV	779	2,001,468	0.39	795	1,968,957	0.40	878	1,986,096	0.44
MT	1,116	425,384	2.62	880	434,403	2.03	1,050	429,344	2.45
NO	63,811	5,107,970	12.49	67,773	5,210,721	13.01	75,591	5,166,493	14.63
PL ⁶⁸	171,240	38,017,856	4.50	136,070	37,967,209	3.58	167,416	38,005,614	4.41
PT	58,276	10,427,301	5.59	67,692	10,341,330	6.55	73,773	10,374,822	7.11
RS	4,095	7,146,759	0.57	477	7,076,372	0.07	414	7,114,393	0.06
SE	67,398	9,644,864	6.99	74,045	9,851,017	7.52	61,782	9,747,355	6.34
SI	1,865	2,061,085	0.90	2,421	2,064,188	1.17	2,359	2,062,874	1.14
SK	46,046	5,415,949	8.50	44,201	5,426,252	8.15	54,213	5,421,349	10.00
UK	-	-	-	920,254	65,382,556	14.07	946,861	64,875,165	14.60

 68 In the case of the Portuguese USP, the values refer to complaints answered by the USP.

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13.3 Complaints received by NRAs about postal services per country per 10,000 inhabitants, 2014-2016

	2014 2010								
	2014			2015			2016		
	NRA complaints	Population	Per 10,000 inhabitants	NRA complaints	Population	Per 10,000 inhabitants	NRA complaints	Population	Per 10,000 inhabitants
AT	94	8,506,889	0.11	89	8,690,076	0.10	159	8,576,261	0.19
BG	117	7,245,677	0.16	197	7,153,784	0.28	146	7,202,198	0.20
CY	8	858,000	0.09	7	848,319	0.08	4	847,008	0.05
CZ	272	10,512,419	0.26	303	10,553,843	0.29	307	10,538,275	0.29
DK	205	5,627,235	0.36	220	5,707,251	0.39	180	5,659,715	0.32
EE	53	1,315,819	0.40	38	1,315,944	0.29	62	1,314,870	0.47
EL	168	10,926,807	0.15	134	10,783,748	0.12	97	1,085,8018	0.09
FR	42	65,889,148	0.01	38	66,759,950	0.01	45	66,488,186	0.01
FY	-	_	-	428	2,071,278	2.07	25	2,069,172	0.12
HR	58	4,246,809	0.14	70	4,190,669	0.17	90	4,225,316	0.21
HU	249	9,877,365	0.25	216	9,830,485	0.22	272	9,855,571	0.28
IS	14	325,671	0.43	13	332,529	0.39	16	329,100	0.49
IT	115	60,782,668	0.02	450	60,665,551	0.07	609	60,795,612	0.10
LT	58	2,943,472	0.20	65	2,888,558	0.23	49	2,921,262	0.17
LV	-	_	-	16	1,968,957	0.08	27	1,986,096	0.14
MT	10	425,384	0.24	4	434,403	0.09	9	429,344	0.21
PT	331	10,427,301	0.32	288	10,341,330	7.36	391	10,374,822	9.33
SE	650	9,644,864	0.67	850	9,851,017	0.86	2520	9,747,355	2.59
SK	32	5,415,949	0.06	31	5,426,252	0.06	21	5,421,349	0.04



13.4 Complaints received by USP about cross-border services per country per 1,000 inhabitants, 2014-2016

	2014		2015		2016				
	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.
BG	675	7,245,677	0.09	2,431	7,202,198	0.34	6,988	7,153,784	0.98
CZ	ı	ı	_	152	10,553,843	0.01	168	10,538,275	0.02
DK	ı	ı	_	6,035	5,707,251	1.06	4,356	5,659,715	0.77
FY	_	_	_	204	2,071,278	0.10	224	2,069,172	0.11
HR	7,518	4,246,809	1.77	9,880	4,225,316	2.34	10,797	4,190,669	2.58
HU	6,759	9,877,365	0.68	8,600	9,855,571	0.87	6,001	9,830,485	0.61
IT	_	_	_	21,692	60,665,551	0.36	23,884	60,795,612	0.39
LV	197	2,001,468	0.10	194	1,986,096	0.10	149	1,968,957	80.0
PT ⁶⁹	27,673	10,427,301	2.65	37,125	10,374,822	3.58	40,367	10,341,330	3.90
RS	_	_	_	3,257	7,076,372	0.46	214	7,114,393	0.03
SE	20,062	9,644,864	2.08	22,726	9,747,355	2.33	17,791	9,851,017	1.81
SK	2,622	5,415,949	0.48	2,252	5,421,349	0.42	2,278	5,426,252	0.42

 $^{^{69}}$ In the case of the Portuguese USP, the values refer to complaints answered by the USP about universal service only.



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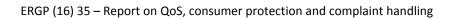




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TERMS AND ABBREVIATIONS

CEN – Comité Européen de Normalisation / European Committee for Standardisation

IPC – International Post Corporation

NA – Not available

NRA – National Regulatory Authority

OPSP.US – Other Postal Service Providers active in the Universal Service area

OPSP – Other Postal Service Providers

US - Universal Service

USP - Universal Service Provider

USO – Universal Service Obligation

X - Not applicable



COUNTRY CODES AND NRA ACRONYMS

COUNTRY CODE	NRA ACRONYM
AT - Austria	RTR
BE - Belgium	ВІРТ
BG - Bulgaria	CRC
CH - Switzerland, Helvetia	POSTCOM
CY - Cyprus	OCECPR
CZ - Czech Republic	сти
DE - Germany	BNETZA
DK - Denmark	TBST
EE - Estonia	ECA
EL - Greece	EETT
ES - Spain	CNMC
FI - Finland	FICORA
FR - France	ARCEP
FYROM - Former Yugoslavia Republic of Macedonia	AP
HR- Croatia	НАКОМ
HU - Hungary	имнн
IE - Ireland	COMREG
IS - Iceland	PFS
IT - Italy	AGCOM
LT - Lithuania	RRT
LU - Luxembourg	ILR



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LV - Latvia	SPRK
MT - Malta	MCA
NL – The Netherlands	ACM
NO - Norway	NKOM
PL - Poland	UKE
PT - Portugal	ANACOM
RO - Romania	ANCOM
RS - Serbia	RATEL
SE - Sweden	PTS
SI - Slovenia	AKOS
SK - Slovakia	TELEOFF
UK – The United Kingdom	ОГСОМ