

1. Over past years, DECO has been monitoring the postal sector and carried out, among others, studies on the delay in postal routing and the reliability of postal services most used by consumers that are part of the universal postal service at the national level.

We always fought for a sustainable and high quality universal postal service for all users throughout the national territory. At present time, consumers have reason to be apprehensive about the consequences of the full liberalization of the postal market and the privatization of CTT in access and quality of services.

In fact, our latest studies on postal delays and service reliability have shown that CTT performance is below the required quality objectives and highlighted the existence of large regional asymmetries in service quality, in particular on delay of mail, both in normal mail and in blue mail. Despite paying the same price, consumers living in different parts of the country do not have access to identical levels of quality of service, which is regrettable and contrary to the principles of universal service. The continued existence of these differences reinforces the need to integrate new quality of service indicators to ensure that consumers have access to high-quality and identical postal services throughout the national territory.

2. Portugal is a country marked by strong constraints related to physical and human geography - a population concentrated on the coast versus the interior, with low population densities, with areas of difficult and isolated topography (not forgetting the islands). For economic and social cohesion reasons, as well as non-marginalization of citizens, it is essential to ensure the maintenance of a high level of quality of service, while at the same time, defining quality of service indicators that ensure uniform quality levels throughout the country.

3. This paper on consultation reports to a previous consultation launched by the European Regulators Group on Postal Services (ERGP) on its Work Program for 2019.



This draft presents the main issues to be developed next year as well as their planned schedule for conclusion, to ensure a correct organization of the activities.

We note that the projects included in the proposal correspond to appropriate and current themes, which are on the agenda, both at national and Community level, with a possible significant impact on the postal sector. The revision of the postal services regulatory framework (Postal Directive), the collection and analysis of sector information, quality of service, consumer protection and complaints handling, the implementation of Regulation 2018/644 on cross-border orders, as well as the evolution of the postal networks and access to them, are issues that deserve the full attention of the National Regulatory Authorities and the ERGP.

4. Notwithstanding the general agreement with the proposed Work Program, as we stated on our latest response, we would like to see, within the universal postal service, a report on the application in the Member States of the principles of price orientation for costs and accessibility, as set out in the Postal Directive. The ERGP is intended to investigate how the principles of price orientation for costs and accessibility are described in national legislation and in the regulatory framework of Member States and how these principles are applied in practice. The problems faced by Member States in implementing these principles and how they deal with them should also be examined.