



Conselho de Administração

24 SET 2018 054204

ERGP Secretariat
DG GROW
Avenue des Nerviens, 105
1040 BRUSSELS
BELGIUM

Subject: ERGP Draft Work Programme 2019 – Comments of CTT Portugal Post

Dear Sirs,

CTT Portugal Post welcomes ERGP's consultation on its Draft Work Programme for 2019, and strongly favours an open dialogue and sound cooperation with ERGP in order to help building a balanced approach to the specific challenges the Postal industry is currently facing.

Pursuant to the above mentioned consultation we are pleased to submit hereunder some brief and generic comments focussed mainly on two topics on which we see of particular interest to prioritise a dialogue, meaning the eventual review of the regulatory framework for postal services and the implementation of the Regulation 218/644.

By touching upon the relevant regulatory aspects for postal services, one should not lose sight that the starting point for legislation on the latter should remain the universal service.

As we all know, the universal postal service remains undissociated from social and economic inclusion across Europe, a fact which is particularly true and important for vulnerable and small businesses. While recognising this, the postal industry acknowledges the need for a balanced and flexible regulatory framework at the European level to cope with the current sector challenges and changing needs of the customers.

Bearing in mind the aforesaid, and as digitization has changed the people's way of communicating and new technologies opened up a wide and diversified range of meeting user



needs and demands, the scope of future postal legislation is the universal service and should be addressed according to a principles based approach, along the following guidelines:

- the necessity to consider the user and national market needs;
- to ensure both its subsidiarity and accessibility;
- to ensure its economic sustainability, by raising the question of how the Universal should be funded.

We are of the opinion that only with this approach, each member state will be able to structure the obligations on its Universal Service Provider in order to respond to domestic circumstances and ensure that the postal services in its home market remain sustainable.

Regarding the implementation of the Regulation on cross-border parcel delivery services, CTT Portugal Post itself - and also through Posteurop - is more than willing to provide further inputs as deemed necessary to ensure a balanced monitoring of Regulation 2018/644, as put forward in its article 11.

Lastly, CTT Portugal Post would like to demonstrate its appreciation on ERGP's commitment to address and debate the needs of the postal sector. The coming years are indeed decisive for the postal sector and our company would like to reiterate its full commitment to provide inputs to ERGP that may contribute to the sustainability of the postal sector and towards a full balanced regulatory environment.

Yours faithfully,

GUY PACHECO
Administrador