



EUROPEAN
REGULATORS GROUP
FOR POSTAL SERVICES

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

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1. Executive Summary

1.1 Background

According to Chapter 6 of the Postal Directive national regulatory authorities (hereinafter NRAs) have to 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 in accordance with 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.

1.2 Methodology

The report is based on the replies received from 30 ERGP members (Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Finland, France, the Netherlands, the Republic of North Macedonia, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden and Turkey) to a questionnaire requesting data for 2021 on quality of service and end-user satisfaction, including consumer protection and complaint handling.

1.3 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 six dimensions:

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

In 2021, 29 ERGP members defined regulatory objectives regarding the universal service and transit time. Only 4 countries (14%) have regulatory objectives regarding loss or substantial delay and 4 countries (14%) have regulatory objectives regarding queuing time in post offices.

A majority of countries have regulatory objectives for priority mail. Of the 29 countries 27 (90%) had regulatory objectives for priority mail and 15 for non-priority mail (50%).

The average result (D+1) in countries which provided information (16 countries) was 77.56%, which is lower than in the previous year (82.36% for 18 countries in 2020). The Western, Southern and Eastern countries show a negative evolution of quality of service in D+1, which is reflected in a decrease in the European average. Among the countries which provided their results and targets (13 countries), the universal service provider (USP) achieved the targets regarding D+1 in only 4 countries, while in the 9 other countries the USP was unable to achieve that target, which is a further decrease compared to last year, when 8 countries achieved their targets. Furthermore, among the 13 countries which have provided their results since 2019 in D+1, 2 made progress regarding their transit time quality, while 11 showed a decrease, which is a further decrease compared to 2020, when 6 countries made progress regarding their transit time quality.

In 2021, of the 11 countries which provided their targets and results for parcels, 9 achieved all their targets. Out of the countries which provided their 2020 and 2021 results, 4 recorded progress for their transit time quality regarding the previous year, while 4 recorded a decline.

Regarding the influence of Brexit on parcels, 5 countries confirmed that there is an influence on this service, while 6 countries reported that there is not and regarding the influence on the introduction of VAT for non-EU parcels, 4 countries responded that there is an influence and 5 countries considered there is 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 almost all ERGP members that 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 delivery. Responses revealed that these exceptions for delivery are mainly related to mountain areas, population density, poor infrastructure, insularity, low traffic volumes, 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 for those exceptions regarding home delivery are geographical conditions, health and safety concerns, population density 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, curb side letterboxes or, in other cases, to town halls, public authority's offices, individual arrangements, etc.

3) Access points

The access points are defined in the Postal Directive¹ as the physical facilities of the postal network, where postal items may be deposited, in order to be processed by the postal providers. Two key components of the postal access points are analysed, namely collection letterboxes and points of contact.

The access point is a rather 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 (90%) and points of contact/postal establishments (93%).

The analysis shows that the most common type of contact or postal establishments, based on the replies of the respondents, are the permanent post offices managed by the USP (more than 93% of the respondents), followed by the permanent post agencies managed by third-party postal establishments.

The importance of having a universal postal service was particularly confirmed during the crisis period (Covid-19 pandemic). Postal services enabled residents to be socially included and to satisfy their basic needs, which indicates that, despite new technologies, postal services are still essential services for all citizens, especially in remote areas.

4) Measurement of consumer satisfaction

According to the responses to the questionnaire, 63% of the NRAs monitor indicators of consumer satisfaction in their country and almost all of these NRAs publish the respective results. The results from the questionnaire show that 30% of the USPs in Europe conduct studies regarding the level of consumer satisfaction and in more than half of the cases results are not published.

5) Surveys regarding consumers' needs and market surveys

In terms of measuring consumers' needs and market surveys, 57% of the NRAs indicated that they conduct such surveys, and most of them publish the results. Only 23% of the NRAs indicated that the USP conducts surveys regarding customers' needs, but the large majority of respondent NRAs (70%) does not have information regarding this issue from their USP.

6) E-commerce aspects

In the past few years, the volumes of postal mail traffic have been regressing constantly except for the parcels/small packages flows, which increased due to the development of e-commerce. This market development led to the improvement of the quality of services and the implementation of new services by integrating modern technologies to meet the increasing complexity of user's needs.

¹ Article 2 of Directive 2008/06/EC

In this context, Regulation 2018/644 of the European Parliament and of the Council on cross-border parcel delivery services was adopted in April 2018, aiming at encouraging the development of e-commerce, this area being regarded as a safeguarding tool for postal services at a European level.

E-commerce is nowadays considered as the new growth engine for parcels, which can compensate for the decline in traditional mail business. In this section, we focus on NRA activities in this area, which are quite limited except in some countries where the NRAs monitor the e-commerce field closely.

Many regulators in the Member States have no powers in terms of regulation and monitoring of the e-commerce field. In most European countries, the bodies that have powers as to e-commerce regulation and monitoring are the ministries of communications. However, in most cases, it seems that consumer protection organisations and various e-trader associations hold the most consistent data regarding electronic commerce.

In these conditions, one of the conclusions drawn from the answers received is that in most cases, the NRAs do not monitor the e-commerce postal flows. Certain regulators have shown an interest in recent years in creating monitoring tools for identifying e-commerce flows, but with very few exceptions, these efforts are in an incipient stage and pose different legal and practical difficulties from country to country. However, a group of 10 authorities does not promote the idea of a common approach at the European level of this issue.

1.4 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 obtained this competence, most of which handle complaints about all postal services. In almost all of the countries where NRAs are responsible for dealing with users' complaints, the NRAs have introduced procedures in order to resolve these complaints.

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

In 2021, the majority of countries had obligations in place for postal service providers to publish information regarding complaint procedures, compensation schemes and dispute resolution covering the USP and other postal service providers as well.

For the last years, the number of countries where alternative (or out-of-court) dispute resolution mechanisms are available to consumers, has been continuously increasing from 22 (67%) in 2014 to 28 (93%) in 2020.

3) *Compensation schemes for individual customers*

Regarding the scope of existing compensation schemes, most countries (20 out of 30 or 66%) have an obligation for a specific compensation scheme which concerns mostly the USP. In the majority of countries the compensation covers items which are damaged (68%), lost or substantially delayed (68%).

4) *Indicators on complaints*

As regards the measurement and publication of complaint handling indicators by the USP, this chapter is analysing the existing obligations and their scope. In the majority of countries (76%), USPs are obligated to measure and/or to publish indicators regarding the complaints received. This obligation is normally laid down by the postal law, but in some cases it is derived from licence conditions, NRA decisions or procedures.

5) *Data on complaints collected by NRAs*

Here we have a look at the data collected by the NRAs on the number of complaints about postal services in general and also about cross-border services. In 2021, the USPs registered again an increase in the number of complaints when compared with 2020 in the majority of countries (70%). Overall the complaints in these countries increased by more than 21%. Most NRAs mentioned lost, damaged or substantially delayed times as the main reasons for cross-border complaints in 2021.

2. Background

Chapter 6 of the Postal Directive (97/67/EC), as amended by Directives 2002/39 and 2008/6 (afterwards referred to as “the Directive” in this report), lays down that the NRAs have to 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 benefit from 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 end-user 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 these 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 complaint handling and e-commerce aspects. 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 and powers of the NRAs.

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

1. 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;
6. e-commerce aspects.

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 regarding complaints;
5. data on complaints collected 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 April 2022 to ERGP members and observer NRAs in order to collect information on the situation in 2021 (except stated otherwise in the report).

We received replies from the 30 ERGP members on 2021 data: Austria, Belgium, Bulgaria, Croatia, Cyprus, the Czech Republic, Denmark, Finland, France, the Netherlands, the Republic of North Macedonia, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, and Turkey.

This year we have not requested the 2021 data from Switzerland as Switzerland is no longer an ERGP observer and since 2020 we have not collected data from the UK either as the UK is not an ERGP member any more due to Brexit. To ensure comparability of ERGP data, we excluded previous UK data and recalculated accordingly the relevant EU averages of the past years.

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 2021.

The data used in the report had already been collected by the NRAs and are publicly available data², 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 2011 to 2021).

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 clusters³:

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

² Only public data were included in the report, confidential figures are not presented individually.

³ 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 following aspects of the quality of service and end-user satisfaction were analysed:

- 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;
- 4.6 e-commerce aspects.

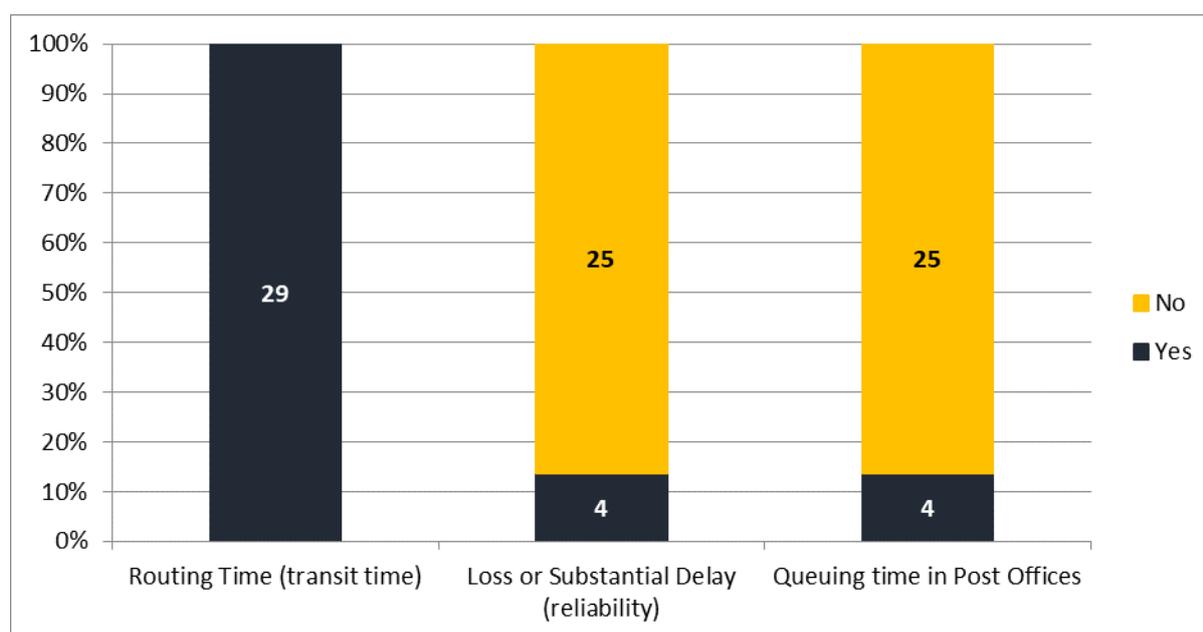
Other elements could also be used to monitor quality of service and end-user satisfaction, but in this report the scope has been limited to the above-mentioned aspects.

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

In accordance with the Directive (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, loss or substantial delay and queuing time in post offices⁴. Regarding the quality of service, 29 countries (100%) define regulatory objectives, which deal with universal service regarding transit time. Only 4 countries (14%) have regulatory objectives regarding loss or substantial delay. Moreover, 4 countries (14%) have regulatory objectives regarding queuing time in post offices, which is an increase by one country compared to 2020. Of those 4 countries, one has regulatory objectives but no measurement obligation for queuing time in post offices.

⁴ Turkey has not sent any information about quality of service.

Figure 1 – Regulatory objectives in 2021


According to Figure 2, in 2021, 27 countries (93%) had regulatory objectives for priority mail and 15 for non-priority mail (52%). Among the 29 countries⁵, 19 countries (66%) had regulatory objectives for parcels, 12 countries (41%) for registered items, 4 countries (14%) for bulk mail, 4 countries (14%) for newspapers/periodicals and 2 countries (7%) for bulk parcels. In 2021, SI also defined regulatory objectives for non-priority mail and BE for single-piece parcels, services that had not been provided in 2020.

Figure 2 – Regulatory objectives for transit time in 2021 – which kind of service has a regulatory objective

	Priority mail	Non-priority mail	Registered item	Bulk mail	News-paper / periodical	Single-piece parcel	Bulk parcel
AT	✓		✓			✓	
BE	✓	✓	✓			✓	
BG	✓	✓				✓	
CY	✓						
CZ	✓						
DE	✓		✓			✓	✓
DK		✓				✓	
EL	✓						
ES	✓					✓	
FI	✓						

⁵ Turkey has not sent any information about quality of service.

	Priority mail	Non-priority mail	Registered item	Bulk mail	News-paper / periodical	Single-piece parcel	Bulk parcel
FR	✓	✓	✓			✓	
HR	✓	✓					
HU	✓	✓	✓			✓	
IE	✓						
IT	✓	✓	✓	✓		✓	
LT	✓	✓	✓			✓	
LU	✓	✓	✓	✓			
LV	✓					✓	
MK		✓				✓	
MT	✓		✓	✓	✓	✓	✓
NL	✓				✓		
NO	✓		✓		✓	✓	
PL	✓	✓				✓	
PT	✓	✓	✓	✓	✓	✓	
RO	✓						
RS	✓	✓				✓	
SE	✓						
SI	✓	✓				✓	
SK	✓	✓	✓			✓	
29	27	15	12	4	4	19	2

Note:

ES: the Spanish legislation does not differentiate between priority and non-priority mail. Single-piece and bulk mail data are measured together.

The figure below specifies whether countries have 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 2021

2021	Regulatory objectives regarding cross-border services	Results regarding cross-border flows?
AT	Yes	Yes
BE	Yes	Yes
BG	Yes	Yes
CY	Yes	Yes
CZ	No	Yes
DE	Yes	No
DK	No	No
EL	Yes	Yes
ES	Yes	Yes
FI	Yes	Yes
FR	No	Yes
HR	Yes	Yes

HU	Yes	Yes
IE	Yes	No
IT	Yes	Yes
LT	Yes	Yes
LU	Yes	Yes
LV	No	No
MK	No	No
MT	Yes	Yes
NL	No	No
NO	Yes	Yes
PL	No	No
PT	Yes	Yes
RO	Yes	Yes
RS	Yes	Yes
SE	Yes	No
SI	Yes	Yes
SK	No	No
Total of "Yes"	21	20

Note:

BE: inbound mail should be treated on an equal basis with priority letters.

In 2021, 21 countries set regulatory objectives for cross-border services.. 20 countries indicated they have the results regarding the quality of service for cross-border flows

According to the figure below, 21 countries established targets for cross-border mail regarding D+3 and D+5 delivery. 13 countries presented the results of transit time for cross-border flows in 2021. FR has not defined targets for cross-border mail.

Figure 4 – Targets and results of cross-border mail in 2021

	D+3			D+5		
	Target	Result		Target	Result	
		Inbound	Outbound		Inbound	Outbound
AT	85.00%	not yet		97.00%	not yet	
BE	85.00%	not yet		97.00%	not yet	
BG	85.00%	73.64%		97.00%	93.03%	
CY	85.00%	5.90%	18.30%	97.00%	30.70%	46.60%
DE	85.00%	NA		97.00%	NA	
EL	85.00%	2.80%	23.30%	97.00%	19.50%	56.40%
ES	85.00%	NA		97.00%	NA	
FI	50.00%			97.00%		
FR		67.00%	75.20%		89.40%	90.90%
HU	85.00%			97.00%		
HR	85.00%	46.37%		97.00%	72.50%	
IE	85.00%	NA		97.00%	NA	
IT	85.00%	48.00%		97.00%	78.00%	
LT	85.00%	6.10%	12.70%	97.00%	26.60%	42.70%
LU	85.00%	85.10%		97.00%	85.50%	

MT	85.00%	c	C	97.00%	c	c
NO	85.00%	15.70%		97.00%	55.50%	
PT	88.00%	43.20%		97.00%	74.30%	
RO	85.00%	17.00%		97.00%	45.80%	
RS	80.00%	15.20%	21.50%	92.00%	54.50%	50.00%
SE	85.00%	NA		97.00%	NA	
SI	85.00%	52.30%	54.10%	97.00%	73.70%	74.40%
Total	21	13	12	21	13	12
Average	83.24%	36.79%	40.51%	96.74%	62.23%	66.47%

Notes:

In ES there is no single result. It depends on the final destination.

IT has only results for inbound priority mail.

In MT the results are confidential.

4.1.1. Measurement of the quality of service for single-piece priority mail in 2021

In 2021, 26 countries set targets for measuring the transit time of end-to-end priority mail in the domestic postal market. In FR no objective was set in 2021 for this service due to the pandemic context. 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 that established targets from D+1 to D+5 delivery regarding single-piece priority mail and their results for 2021, according to which:

- 19 countries set a target for D+1 delivery, of which 13 countries at 90% or more. AT, MT, NL and SI had the highest target (95%);
- 16 countries provided their results for 2021 for D+1 delivery and the average value was 77,56%, which is lower than in the previous year (82.36%);
- 14 countries set a target for D+2 delivery, ranging from 85% (LU, RO and RS) to 99.5% (SI);
- 13 countries established a target for D+3 delivery (between 85% in NO and 100% in SI);
- 5 countries set targets for D+4 (AT, FI, IT, PT and RO), with AT setting a goal of 100%;
- only EL, ES, FI and NO set a target for D+5;
- EL changed the targets from D+1 (87.00%) to D+3 (90.00%) and from D+3 (98.00%) to D+5 (98.00%) and RS reduced the objective values in 2021 compared to 2020, from 83% to 80% for D+1, from 88% to 85% in D+2 and from 93% to 90% for D+3.

Figure 5 – Targets and results of single-piece priority mail in 2021

	D+1		D+2		D+3		D+4		D+5	
	Target	Result								
AT	95.00%	not yet	98.00%	not yet			100.00%	not yet		
BE	95.00%		97.00%							
BG	80.00%	50.00%	95.00%	80.60%						
CY	90.00%	80.00%			97.00%	97.10%				
CZ	92.00%	93.01%								
DE	80.00%	82.70%	95.00%	96.80%						
EL					90.00%	68.90%			98.00%	86.10%
ES					93.00%	not yet			99.00%	not yet
FI							50.00%	97.60%	97.00%	99.30%
FR		81.90%						99.40%		
HR	85.00%	87.56%	95.00%	97.26%						
HU	90.00%				97.00%					
IE	94.00%	84.00%			99.50%	98.20%				
IT	80.00%	81.70%					98.00%	98.70%		
LT	85.00%	66.09%			97.00%	96.01%				
LU			85.00%	99.50%	99.00%	99.90%				
LV	90.00%	89.00%								
MT	95.00%	c	98.00%	c	99.00%	c				
NL	95.00%	93.90%								
NO					85.00%	93.20%			97.00%	99.00%
PL	82.00%	54.00%	90.00%	82.80%	94.00%	92.40%				
PT	94.50%	79.80%	90.00%	69.80%	99.90%	96.70%	99.90%	94.50%		
RO			85.00%	53.62%			97.00%	80.97%		
RS	80.00%	35.62%	85.00%	58.81%	90.00%	75.70%				
SE			95.00%	97.90%						
SI	95.00%	90.00%	99.50%	99.40%	100.0%	99.90%				
SK	94.00%	91.67%	99.00%	98.84%						
Total	19	16	14	11	13	10	5	5	4	3
Average	88.92%	77.56%	93.32%	85.03%	95.42%	91.82%	88.98%	94.23%	97.75%	94.80%

Notes:

In BE the target of D+1 (93.00%) is set by law and 95.00% is set by the management contract and that of D+2 (97.00%) is set by law.

In FR no objective was set in 2021 due to the pandemic context.

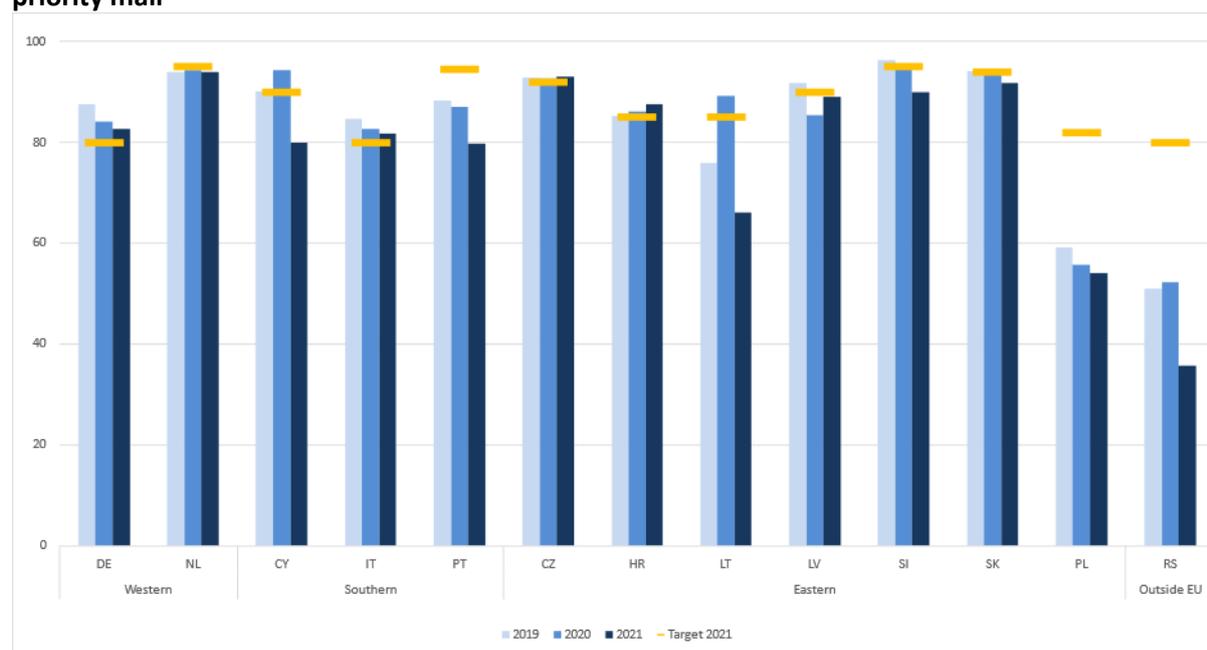
In MT the results are confidential.

In PT ANACOM approved the deduction of all records for the year 2021. In PT the measurement of D+1 and D+3 applies to letters sent between any location of Portugal Mainland and the measurement of D+2 and D+4 applies to letters sent from, between or to any location of Autonomous Regions of Azores and Madeira. The measurement includes lost mail.

In SK the measurement should be in accordance with the requirements for the quality of the universal service, issued by the NRA. Measurement of the year 2021 will be audited.

The figure below shows that, in 2021, 4 of the 13 countries which provided their targets and results regarding D+1 delivery achieved their target, while 9 countries did not. Among the 13 countries which have provided their results since 2019 for D+1, 2 recorded progresses in their transit time quality while 11 recorded a decrease.

Figure 6 – Targets (2021) and results (2019, 2020 and 2021) regarding D+1 delivery of single-piece priority mail



Note:

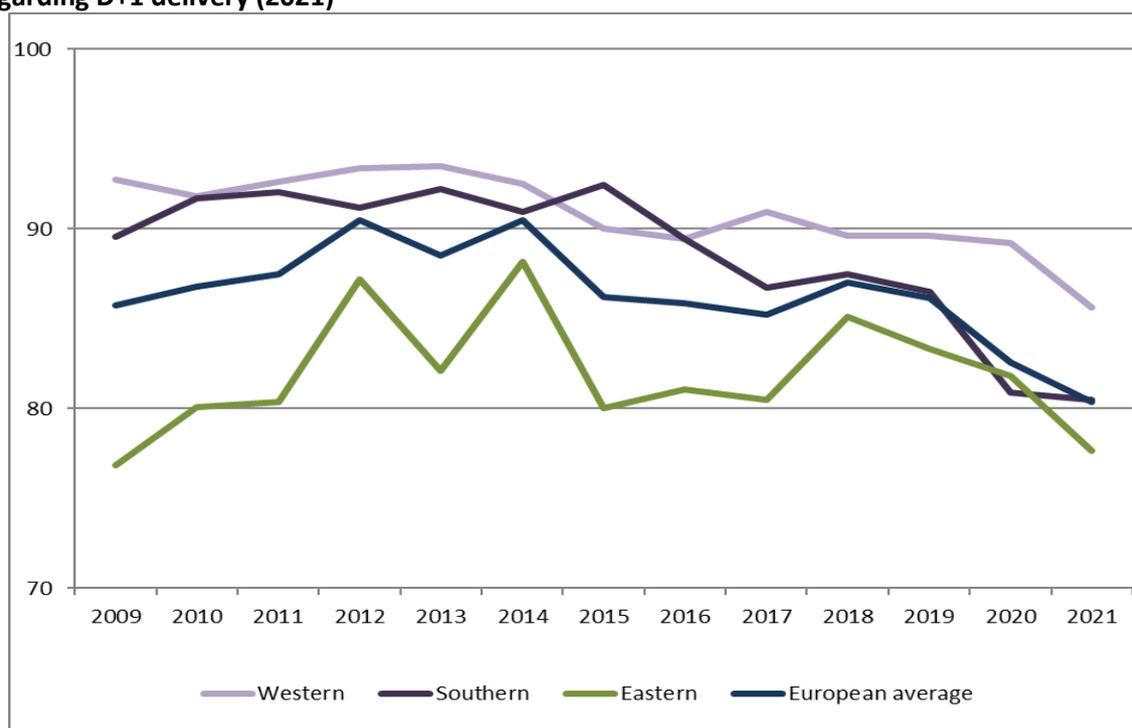
Data considering the 13 countries which have provided data since 2019 (Western: DE, NL; Southern: CY, IT, PT; Eastern: CZ, HR, LT, LV, SI, SK, PL; Outside-EU: RS).

The figure below shows that as far as quality of service regarding priority mail (D+1) between 2009 and 2021 is concerned, better results are observed between 2012 and 2014.

The countries outside the EU were excluded from this analysis, because in 2021 this cluster was only represented by Serbia, and this country reported that the USP has decreased in QoS for letter mail items regarding D+1 delivery. Additionally, in Serbia there are some changes in methodology of measurement, so data could not be comparable to previous years.

The developments of quality of service have deteriorated in the Western, Southern and Eastern countries for D+1 since 2019, which is reflected in a decrease in the European average.

Figure 7 – Evolution of the average value of quality of service of single-piece priority mail regarding D+1 delivery (2021)



Note:

Data considering all the countries which have provided data on the results for single-piece priority mail regarding D+1 delivery, since 2009 (Western: AT, BE, DE, IE, FI, FR, LU, NL; SE; Southern: CY, EL, IT, MT, PT; Eastern: BG, CZ, EE, HR, LT, LV, SI, SK, PL; RO; Outside EU: NO, RS). In previous years, countries which had given objectives and achieved values since 2009 were considered.

Regarding the measurement methodology, in 2021, 23 countries used the European standard EN 13850⁶ for the measurement of single-piece priority mail transit time⁷. 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 9 countries⁸, the NRA decided on the application of force majeure events at the request of the operator. In 2021, the number of days of force majeure accepted by the NRAs varied between zero days and the whole year⁹, mainly due to the pandemic crisis, strikes and weather conditions. This matter will be dealt with in chapter 4.1.6.

Only 7¹⁰ indicated that there are other exceptions made for quality measurements regarding letters and parcels, which can impact the quality of service measurement¹¹.

⁶ 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.

⁷ See annex 1.

⁸ BE, BG, HR, EL, IE, MK, PT, SI, SK.

⁹ See annex 2.1.

¹⁰ BG, EL, FI, HU, IE, MK and RO.

¹¹ See annex 2.2.

4.1.2. Measurement of the quality of service for single-piece non-priority mail in 2021

14 countries have regulatory objectives for non-priority mail. As regards the methodology for the measurement of the quality of service for single-piece non-priority mail, 5 countries used the European standard EN 14508¹², 5 countries used EN 13850¹³ and SK used EN 13850, together with EN 14508.

The figure below presents the countries which had a regulatory objective for the routing time of single-piece non-priority mail in 2021. Based on this table, one can conclude that, in 2021, 10 countries had a target regarding D+3, whereas 6 countries had a target regarding D+2, 5 countries had a target regarding D+5, 4 countries had a target regarding D+4 delivery, 1 country had a target regarding D+1 and 1 other country regarding D+6.

HU reduced the target value for D+3 from 97% to 85% and increased the target value for D+5 from 96% to 97%.

Figure 8 – Targets and results of single-piece non-priority mail in 2021

	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					95.00%	not yet	97.00%	not yet				
BG			80.00%	83.10%	95.00%	93.50%						
DK									93.00%	96.50%		
FR				93.20%				99.30%				
HR					95.00%	96.04%						
HU					85.00%				97.00%			
IT							90.00%	83.50%			98.00%	94.20%
LT			85.00%	66.51%			97.00%	71.52%				
LU			85.00%	99.50%	99.00%	99.90%						
MK	85.00%		90.00%		95.00%							
PL					85.00%	68.20%			97.00%	91.90%		
PT					96.30%	79.30%			99.70%	94.90%		
RS			80.00%	55.92%	85.00%	73.29%			90.00%	90.39%		
SK			94.00%	90.75%			99.00%	99.75%				
Total	1	0	6	6	10	7	4	4	5	3	1	1
Average	85.00%	0.00%	85.67%	81.50%	92.93%	87.13%	95.75%	88.52%	95.34%	93.42%	98.00%	95.20%

Notes:

BE: Common target defined by the management contract.

FR: No objective was set in 2021 due to the pandemic context.

MK: No measurement was conducted in 2021.

PT: ANACOM approved the deduction of all records for the year 2021. The measurement includes lost mail.

SK defined in 2021 a target for D+4 (99.00%). Measurement should be in accordance with the requirements for the quality of the universal service, issued by the NRA. Measurement of the year 2021 will be audited.

SI created in 2021 the non-priority mail service.

¹² BE, BG, DK, IT and PT.

¹³ FR, HR, LU, RS and SI.

4.1.3. Measurement of the quality of service for registered mail in 2021

The figure below presents the countries which had a regulatory objective for registered mail in 2021. Based on this table, it can be concluded that:

- 5 countries set a quality target regarding D+1 delivery (BE, DE, LT, MT and PT) ranging from 80% (DE) to 98% (MT);
- regarding D+2 delivery, 6 countries set quality targets (BE, DE, LU, MT, PT and SK) ranging from 85% (LU) to 99% (MT);
- 5 countries set targets for D+3, 3 countries for D+4 and 1 country for D+5 and another for D+6.

Figure 9 – Targets and results of registered mail in 2021

	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	95.00%	not yet	97.00%	not yet								
DE	80.00%	82.70%	95.00%	96.80%								
FR				93.40%				98.70%				
HU					85.00%				97.00%			
IT							90.00%	91.40%			98.00%	96.50%
LT	85.00%	78.00%			97.00%	95.00%						
LU			85.00%	99.50%	99.00%	99.90%						
MT	98.00%	c	99.00%	c	99.99%	c						
PT	94.50%	91.90%	90.00%	70.80%	99.90%	99.40%	99.90%	93.70%				
SK			94.00%	94.44%			99.00%	99.83%				
Total	5	3	6	5	5	3	3	4	1	0	1	1
Average	90.50%	84.20%	93.33%	90.99%	95.98%	98.10%	96.30%	95.91%	97.00%	0.00%	98.00%	96.50%

Notes:

BE: common target defined by the management contract.

FR: no objective was set in 2021 due to the pandemic context.

HU reduced the target value for D+3 from 97.00% to 85.00% and created a new target value for D+5 with 97.00%.

MT: results are confidential.

PT: ANACOM approved the deduction of all records for the year 2021. The measurement of D+1 and D+3 applies to letters sent between any location of Portugal Mainland and the measurement of D+2 and D+4 applies to letters sent from, between or to any location of the Autonomous Regions of Azores and Madeira.

SK: measurement should be in accordance with the requirements for the quality of the universal service, issued by the NRA. Measurement of the year 2021 will be audited.

In comparison with the 2020 results for quality, amongst the 6¹⁴ countries which provided their results, DE, FR, IT, LT and PT showed a decrease, LU (D+2) recorded a progress. LU kept the result for D+3.

¹⁴ DE, FR, IT, LT, LU and PT.

4.1.4. Measurement of the quality of service for parcels in 2021

For the measurement of the parcel transit time, the countries used different methodologies. According to their answers, 2 countries used the European standard TR 15472, 4 countries used the Standard EN 13850 (one of them together with the EN 14508), 2 countries used a methodology based on a track and trace system and 1 country used another methodology.

The figure below presents the countries which had a regulatory objective for the transit time of single-piece parcels in 2021. Based on this table, the conclusions are the following:

- For D+1 delivery, 4 countries set targets, ranging from 80.00% for the lowest (BG and PL) to 98,00% for the highest (MT). The results achieved average 87.75%;
- Regarding D+2 delivery, 9 countries set targets. MT (99.00%) presented the highest target, while MK (70%) had the lowest one;
- Concerning D+3 delivery, 9 countries set targets, 75% being the lowest (MK) and 99.00% the highest (MT).

Figure 10 – Targets and results for single-piece parcels in 2021

	D+1		D+2		D+3		D+4		D+5		D+6	
	Target	Result										
AT			90.00%	not yet					100.0%	not yet		
BG	80.00%	87.80%	80.00%	87.80%	95.00%	94.50%						
DE			80.00%	97.20%								
DK	93.00%	94.00%										
ES					80.00%	not yet			95.00%	not yet		
FR				88.50%				98.60%				
HU			85.00%		95.00%							
IT							90.00%	93.50%				
LT							97.00%	97.00%				
LV							98.00%	99.00%				
MK			70.00%		75.00%				80.00%			
MT	98.00%	c	99.00%	c	99.00%	c						
NO							85.00%	96.50%			97.00%	99.30%
PL	80.00%	80.00%			90.00%	99.20%						
PT					96.30%	90.00%			99.70%	96.40%		
RS			80.00%	91.18%	90.00%	96.56%			95.00%	98.89%		
SI			80.00%	99.09%	95.00%	99.70%						
SK			94.00%				99.00%					
Total	4	3	9	5	9	5	5	5	5	2	1	1
Average	87.75%	87.27%	84.22%	92.75%	90.59%	95.99%	93.80%	96.92%	93.94%	97.65%	97.00%	99.30%

Notes:

DE: Used B2X.

FR: No objective was set in 2021 due to the pandemic context.

MK: No measurement was conducted in 2021.

MT: Results are confidential.

PT: ANACOM approved the deduction of all records for the year 2021.

SK: No measurement was conducted in 2021.

In 2021, of the 11¹⁵ countries which provided their targets and results for parcels, 9¹⁶ achieved all their targets. Out of the countries which provided their 2020 and 2021 results, 4¹⁷ recorded progress for their transit time quality regarding the previous year while 4¹⁸ recorded a decline. LV maintained last year's results. FR had a positive evolution in D+2 delivery and a deterioration in D+4 and NO had a positive evolution in D+4 and maintained the value in D+6.

Regarding the influence of Brexit on parcels, 5 countries¹⁹ confirmed that there is an influence on this service, while 6 countries²⁰ reported that there is not. 3 countries cited the new VAT rules implemented between the UK and the EU as reasons for the influence (ES, HU and IT). IT specified that delays in processing and customs issues were experienced, that there was an increase of parcels refused by receivers, due to unexpected VAT, or abandoned by receivers of parcels, to be returned to the sender. SI and LT mentioned the decrease of parcels from non-EU countries (including the UK).

Regarding the influence on the introduction of VAT for non-EU parcels, 4 countries responded that there is an influence (ES, HU, LT and SI) and 5 countries considered there is not (BG, MT, NO, PL and RS). ES reported that the Spanish USP deems that the lack of alignment between European regulations and UPU regulations together with the lack of technical capacity of the countries of origin, means that the European postal operators are assuming the operational, technological and commercial costs, having an impact not only at an operational and economic level, but also in the quality of service to the final consumer. HU considers that the VAT on non-EU parcels has increased the administrative burden and has brought a large number of complaints. LT pointed out that the number of parcels sent from non-EU countries has decreased and SI verified lower quantities coming from Asia due to additional fees.

It is noted that there is a strong relationship between the Brexit and the increase of VAT for parcels from non-EU countries, both with a special influence on parcels from the United Kingdom.

4.1.5. Additional information regarding the quality of service in 2021

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

Regarding loss or substantial delay, 4 countries had regulatory objectives in 2021 (see figure below). RS has not defined any regulatory objectives and only has a measurement obligation.

¹⁵ BG, DE, DK, IT, LT, LV, NO, PL, PT, RS and SI.

¹⁶ DE, DK, IT, LT, LV, NO, PL, RS and SI.

¹⁷ BG, NO, PL and SI.

¹⁸ DK, IT, LT and PT.

¹⁹ ES, HU, IT, LT and SI.

²⁰ BE, BG, MT, NO, PL and NO.

Figure 11 – Regulatory objectives for loss or substantial delay in 2021

	Priority mail	Non-priority mail	Registered item	Bulk mail	Newspaper / periodical	Single-piece parcel	Bulk parcel
BG	✓	✓				✓	
HU			✓	✓	✓	✓	
MK		✓					
MT	✓			✓	✓		
Total 13	2	2	1	2	2	2	0

Regarding the transit time of bulk mail, IT, LU, MT and PT set regulatory objectives. FR, IT, LU, MT and PT measured this service, of which FR, MT and PT used the European standard EN 14534 and LU used EN 13850. IT has not indicated a methodology.

Regarding newspapers and periodicals, only MT, NL, NO and PT set regulatory objectives and have results. AT, DK and FR measured the transit time for newspapers and periodicals but without regulatory objectives. FR and PT used the European standard EN 14534 and MT used the standard EN 13850. AT, DK, NL and NO have not indicated a methodology.

Regarding non-compliance and corrective measures, 18 countries have a framework of corrective measures in case of non-compliance with the quality of service target and 8 have had recent cases or decisions regarding non-compliance and corrective measures.

Regarding the measurement of single-piece priority mail, single-piece non-priority mail, registered mail, single-piece parcel and cross-border mail, it is important to note that in the majority of countries it is the operator who pays for the measurement (above 78%) and 50% or more of the countries indicate that the measurement is audited. The measurement of single-piece priority mail, registered mail and cross-border mail was ordered by the USP in 70% or more of the countries and single-piece non-priority mail in 57% and single-piece parcels in 65% of the countries. The party responsible for ensuring the audit of single-piece priority mail, single-piece non-priority mail, registered mail and single-piece parcels is mainly the NRA. Regarding cross-border mail, "others" is mainly mentioned, which must be because International Post Corporation (IPC) is measuring this service at the European level.

Only regarding domestic services, of the 23 countries which provided information on the impact of COVID-19 on the measurement/values of the indicators, 7 (30%) reported that COVID-19 had an impact²¹, 13 (57%) did not confirm an impact²² and 3 (13%) countries had services with and without impact²³.

The domestic services most often referred to as having been impacted by COVID-19 were priority mail (10), non-priority mail and single-piece parcels (5), registered mail (4), which is certainly due to the fact that they belong to the group of most used services (see Figure 12 below).

²¹ ES, FR, HU, LV, MT, PT and SK.

²² BE, BG, CY, CZ, DE, IE, HR, IT, LT, NL, NO, RO and SE.

²³ PL, RS and SI.

Regarding cross-border mail services, 9 countries sent information about the impact on this service and only 3 said that it did not have any impact on this service (BE, HR and IT).

Figure 12 – Kind of service with impact of COVID-19 on their measurement/indicator value

	Priority mail	Non-priority mail	Registered item	Bulk mail	News-paper / periodical	Single-piece parcel	Bulk parcel	Cross-border mail
BE	No	No	No			No		No
BG	No	No				No		
CY	No							Yes
CZ	No							
DE	No		No					
EL								Yes
ES	Yes					Yes		
FR	Yes	Yes	Yes	Yes	Yes	Yes		Yes
HR	No	No						No
HU	Yes					Yes		Yes
IE	No							
IT	No	No	No	No		No		No
LT	No					No		
LV	Yes							
MT	Yes		Yes	Yes	Yes	Yes	Yes	
NL	No							
NO	No					No		Yes
PL	Yes	Yes				No		
PT	Yes	Yes	Yes	Yes	Yes	Yes		Yes
RO	No							Yes
RS	Yes					No		Yes
SE	No							
SI	Yes	Yes				No		
SK	Yes	Yes	Yes					
Number of "Yes"	10	5	4	3	3	5	1	9

Note: The countries without information on this subject are not mentioned

The countries having indicated that the measurement / indicator values were impacted by the pandemic situation, mentioned that the following measures have been taken to try to account for or reverse this impact:

- 4 countries mentioned that the measurement periods affected by the pandemic were considered force majeure and were excluded from the calculation of indicator values or that the measurement was suspended²⁴;
- Regarding cross-border mail, 3 countries used other transport solutions (e.g. ground transportation) instead of air freight due to the closure of borders and the suspension of international flights²⁵;
- The absenteeism due the pandemic (in FR and SK) was solved by the recruitment of additional staff (FR and PT).

²⁴ BG, PT, SI and SK.

²⁵ EL, NO and PT.

4.2. Collection and delivery

Regarding collection and delivery, we distinguish three key elements. Of course, the most important one is the parameter regarding the frequency of collection and especially deliveries. Secondly, we will explore the current exceptions for 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 has been extended to 6 days a week. More specifically, the countries which have at least one collection and/or delivery per day for six days a week are Bulgaria (at least two collections and deliveries per day, only in Sofia), France, Germany, Malta and Switzerland. The Republic of Serbia is an exception, where collections and deliveries are made once or twice a day, for 6 days a week.

Regarding the provision of collections and deliveries (daily and weekly), a centralised situation looks as follows:

- For items of correspondence:

- Collections:

- **Daily collections:** 26 of 30 USPs provide one collection per day. It should be pointed out that the USP in Bulgaria provides two collections per day in Sofia, and the one in Serbia provides one or two collections per day throughout the country. No specific response on this indicator has been received from Denmark and Turkey.

- **Weekly collections:** 26 of 30 USPs provide five collections per week with the following exceptions: Bulgaria - 5/6 collections per week; France, Germany, Malta, and Serbia - 6 collections per week.

- Deliveries:

- **Daily deliveries:** 26 out of 30 USPs provide one delivery per day. The only exceptions are the Bulgarian provider who makes two deliveries in Sofia, the Norwegian provider who makes 0.5 deliveries per day.

- **Weekly deliveries:** 26 of 30 USPs provide five deliveries per week with the following notable exceptions: France, Germany and Malta - 6 deliveries per week

- For parcels

- Collections:

- **Daily collections:** 27 of 30 USPs provide one collection per day. It should be pointed out that the USP in Bulgaria provides two collections per day in Sofia and the one in Serbia provides one or two collections per day throughout the country. No specific response on this indicator has been received from Denmark and Turkey.

- **Weekly collections:** 26 of 30 USPs provide five collections per week with the following exceptions: France, Germany, and Malta - 6 collections per week; Norway - 3 collections per week.

- **Deliveries:**

- **Daily deliveries:** 27 of 30 USPs provide one delivery per day. The only exceptions are the Bulgarian provider who makes two deliveries in Sofia and the Norwegian provider who makes 0.5 deliveries per day. No specific response on this indicator has been received from Denmark and Turkey.

- **Weekly deliveries:** 26 of 30 USPs provide five deliveries per week with the following notable exceptions: France, Germany, Malta - 6 deliveries per week - and Norway, where only 3 deliveries per week are provided.

The most important aspects mentioned above are graphically detailed in the following two figures.

Figure 13 – Frequency of collection in Europe in 2021

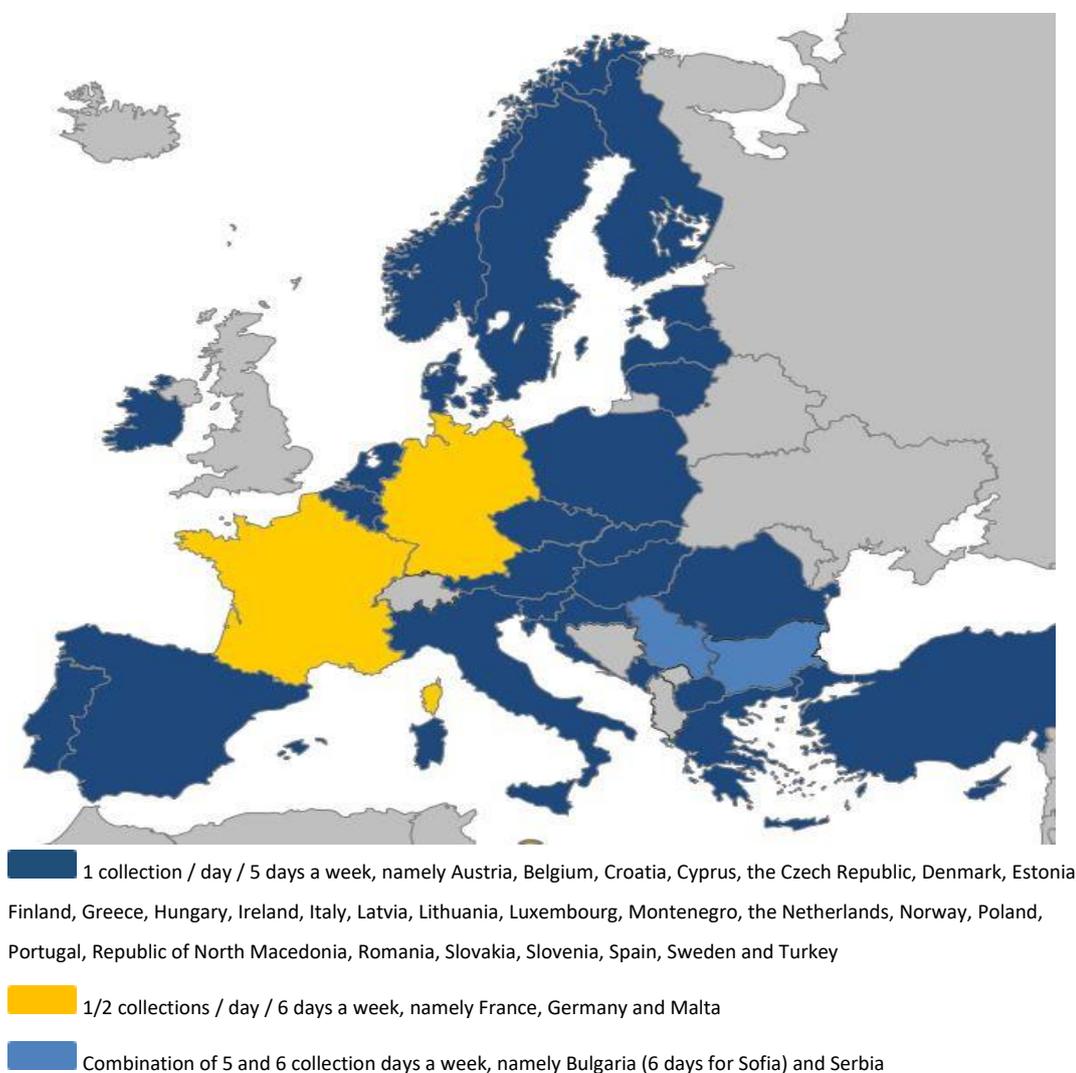
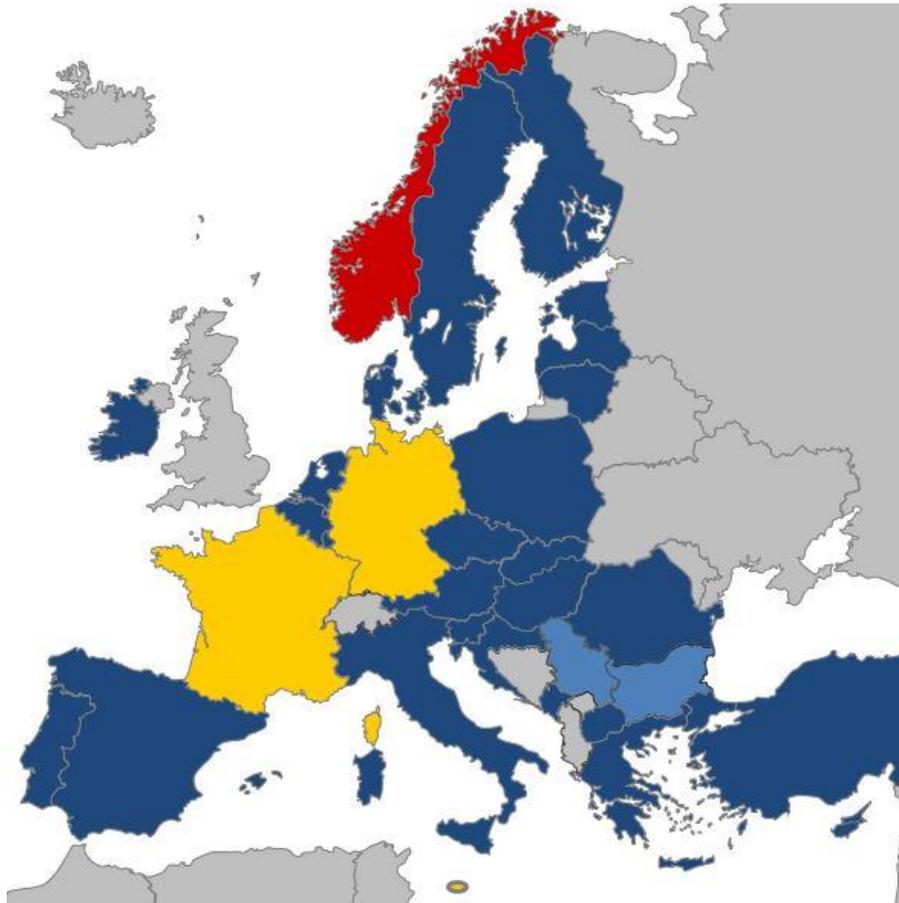


Figure 14 – Frequency of delivery in Europe in 2021



Dark Blue 1 delivery / day / 5 days a week, namely Austria, Belgium, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Finland, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Montenegro, the Netherlands, Poland, Portugal, Republic of North Macedonia, Romania, Slovakia, Slovenia, Spain, Sweden and Turkey,

Yellow 1/2 deliveries / day / 6 days a week, namely France Germany and Malta

Light Blue Combination of 5 and 6 delivery days a week, namely Bulgaria (6 days for Sofia) and Serbia

Red USP is obliged to deliver mail in mailboxes every other day. However, in Norway there is a possibility to have access to post office boxes, which enables the receipt of post five days a week.

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

According to Article 3(3) of the Directive²⁶, exceptions in the frequency of collection/delivery are allowed in circumstances or geographical conditions deemed exceptional, which include 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.

In the following 14 states, inside the universal service obligation, no case of geographical or economic exceptionality was identified in the sense provided by the European Directive: Austria, Belgium, Cyprus, Czech Republic, Germany, Hungary, Latvia, Lithuania, Malta, Netherlands, Poland, Portugal, Slovenia and Spain.

The reasons for geographical exceptionality reported by the respondents, in order from the most frequent to the rarest, are the following:

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

- **mountain areas:**
 - for collection: 10 countries - Bulgaria, France, Greece, Italy, North Macedonia, Norway, Romania, Serbia, Sweden and Turkey
 - for delivery: 11 countries - Bulgaria, France, Greece, Italy, North Macedonia, Norway, Romania, Serbia, Slovakia, Sweden, and Turkey
- **population density:**
 - for collection: 9 countries - Bulgaria, Finland, Italy, North Macedonia, Norway, Romania, Serbia, Sweden and Turkey
 - for delivery: 10 countries - Bulgaria, Finland, Italy, North Macedonia, Norway, Romania, Serbia, Slovakia, Sweden, and Turkey

²⁶ 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."

- **poor infrastructure²⁷:**
 - for collection: 6 countries - Bulgaria, North Macedonia, Norway, Romania, Serbia and Turkey
 - for delivery: 6 countries - Bulgaria, North Macedonia, Norway, Romania, Serbia, and Turkey
- **insularity:**
 - for collection: 6 countries - Denmark, Finland, France, Greece, Norway and Sweden
 - for delivery: 6 countries - Denmark, Finland, France, Greece, Norway, and Sweden
- **low traffic volumes:**
 - for collection: 6 countries - Denmark, Italy, North Macedonia, Romania, Serbia and Turkey
 - for delivery: 6 countries – Denmark, Italy, North Macedonia, Romania, Serbia, and Turkey
- **costs of service:**
 - for collection: 4 countries – North Macedonia, Norway, Romania and Serbia
 - for delivery: 4 countries – Norway, Romania, Serbia and Slovakia
- **extreme weather conditions:**
 - for collection: 3 countries - Greece, Romania and Turkey
 - for delivery: 3 countries - Greece, Romania, and Turkey

²⁷ Depends on local circumstances, e.g. lack of roads.

Figure 15 – Reasons for exceptions regarding collection in 2021

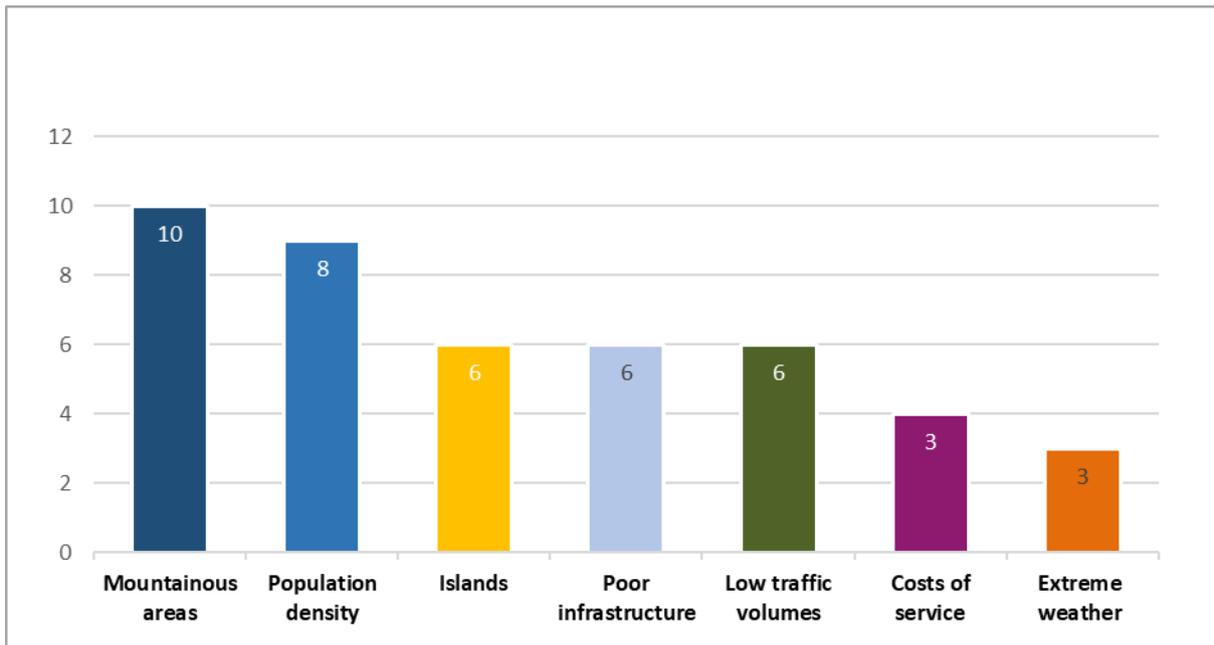
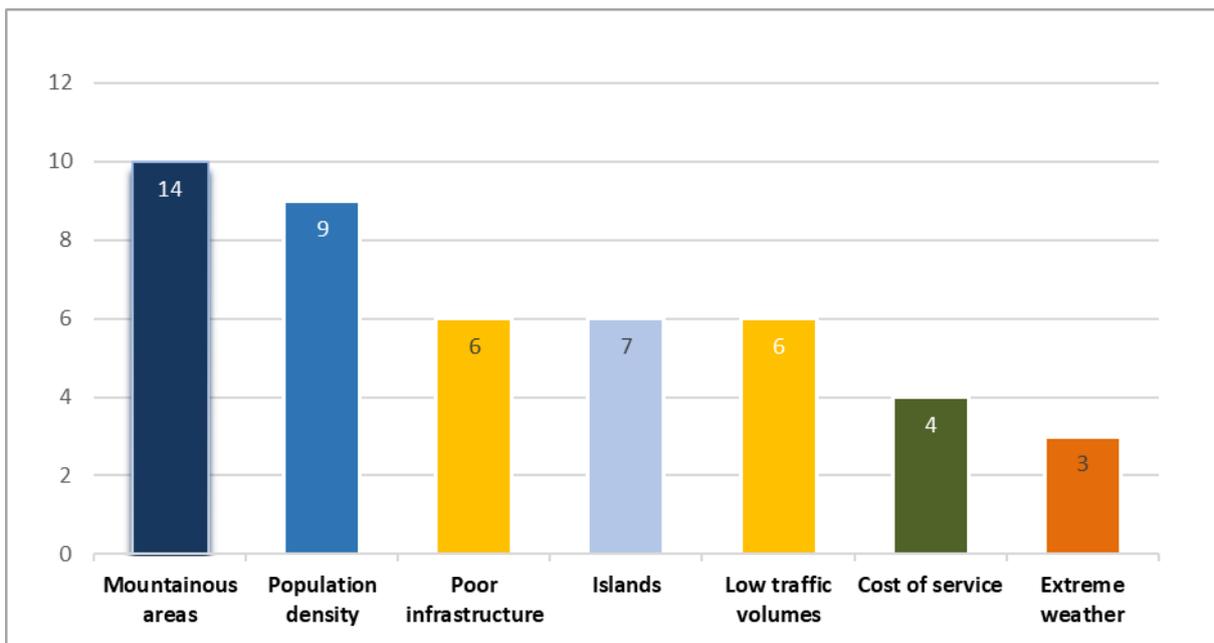


Figure 16 – Reasons for exceptions regarding delivery in 2021



The criteria of geographical or economic exceptionalities are defined in 8 European states for the collection operation (Bulgaria, Denmark, Greece, Ireland, Italy, Romania, Serbia, and Turkey) and in 9 European states for the delivery operation (Bulgaria, Denmark, Greece, Ireland, Italy, Romania, Serbia, Slovakia, and Turkey). In 8 of these countries, exceptional cases are defined for both collection and delivery (Bulgaria, Denmark, Greece, Ireland, Italy, Romania, Serbia and Turkey).

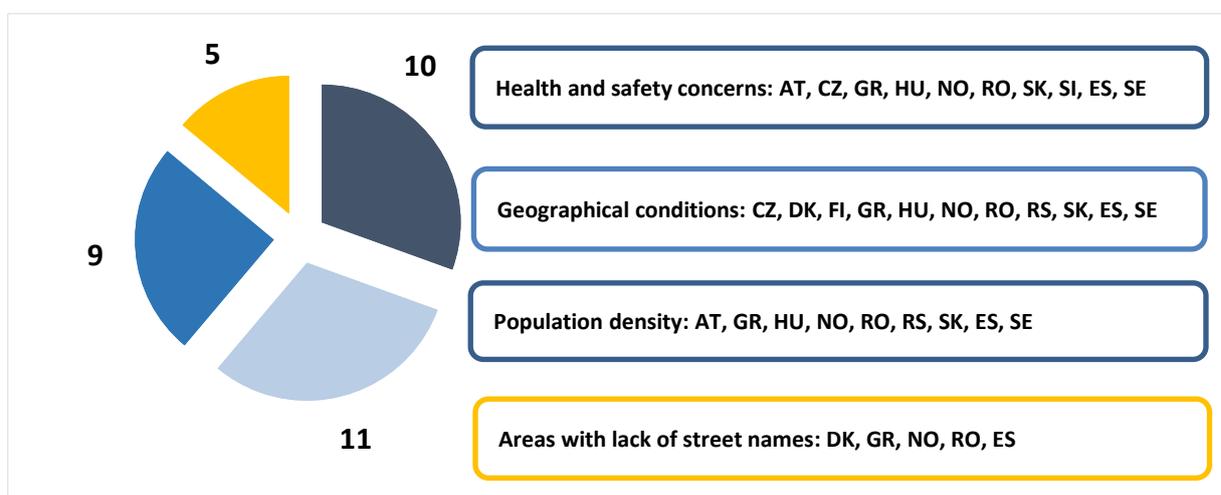
4.2.3. Obligation to deliver mail to the home or premises of every natural or legal person

Besides the obligation to ensure collection and delivery frequencies, in the execution of the universal service there may be special cases where delivery of postal items to the recipient's home is not possible for various reasons.

The regulators from 15 states (Austria, Czech Republic, Denmark, Finland, Greece, Hungary, Luxembourg, Norway, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden and Turkey) have identified some exceptional cases where universal service providers are allowed to execute delivery under special conditions. The exceptional cases reported are:

- special geographical conditions, in 11 countries (CZ, DK, FI, GR, HU, NO, RO, RS, SK, ES and SE);
- health and safety concerns, in 11 cases (AT, CZ, GR, HU, NO, RO, SK, SI, ES, SE and TR);
- population density, in 9 countries (AT, GR, HU, NO, RO, RS, SK, ES and SE);
- areas with improper toponymy (lack of street names), in just 5 cases (DK, GR, NO, RO and ES).

Figure 17 – Exceptions in terms of home delivery in 2021



Moreover, 7 regulators (Czech Republic, Greece, Hungary, Luxembourg, Romania, Slovenia and Spain) have identified other exceptional situations that they have defined separately (e.g. delivery of postal items with declared value higher than 150000 CZK, in the Czech Republic; disproportionate difficulty, in Hungary; poor infrastructure, in Romania; limited access, in Slovenia).

In 12 states there are special criteria for defining the exceptional cases for home delivery (Austria, Czech Republic, Denmark, Finland, Greece, Hungary, Romania, Serbia, Slovakia, Slovenia, Spain and Sweden).

The answers revealed that in these situations the delivery service is directed to local post offices (11 countries: AT, CZ, GR, LU, NO, RO, SK, SI, ES, SE and TR), cluster boxes (10 countries: AT, CZ, GR, LU, NO, RO, SK, SI, ES, SE), curbside letterboxes (6 countries: GR, HU, LU, NO, RO, SE) or, in other cases, to town halls, 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 the user and the USP, etc.

Annex 4 contains Internet links for countries in which the criteria establishing the exceptional geographical character for frequency are both defined and published. Unfortunately, many of the documents published at the Internet addresses mentioned below are only available in the languages of those states.

4.3. Access points

The Postal Directive²⁸ defines access points as the physical facilities of the postal network, where postal items may be deposited, to be processed by the postal providers.

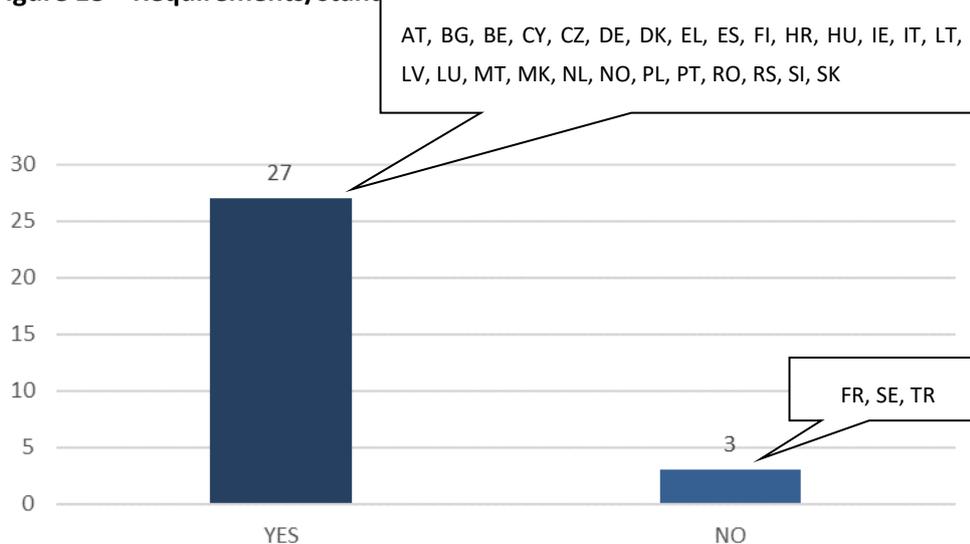
In the sections below two key components of the postal access points are analysed, namely:

- collection letterboxes
- points of contact.

4.3.1. Collection letterboxes

Compared to previous years, the situation regarding the collection letterboxes is almost the same. Most of the countries (90%) from the survey have set the criteria and requirements to ensure an adequate number of collection letterboxes on national territory. These requirements and standards have not been imposed by the regulation in France, Sweden and Turkey.

Figure 18 – Requirements/standards to ensure an adequate number of collection letterboxes



When determining the criteria based on which they install letterboxes, countries consider national specificities, first of all consumer's needs. Also important is the economical sustainability, considering the declining volume of letter-post items.

In 36% of the countries the criteria are set according to the number of inhabitants, but there are also different requirements concerning rural and urban areas. Considering the different criteria applied among the countries they are systematised into the most listed criteria as follows:

²⁸ Article 2 of Directive 2008/06/EC

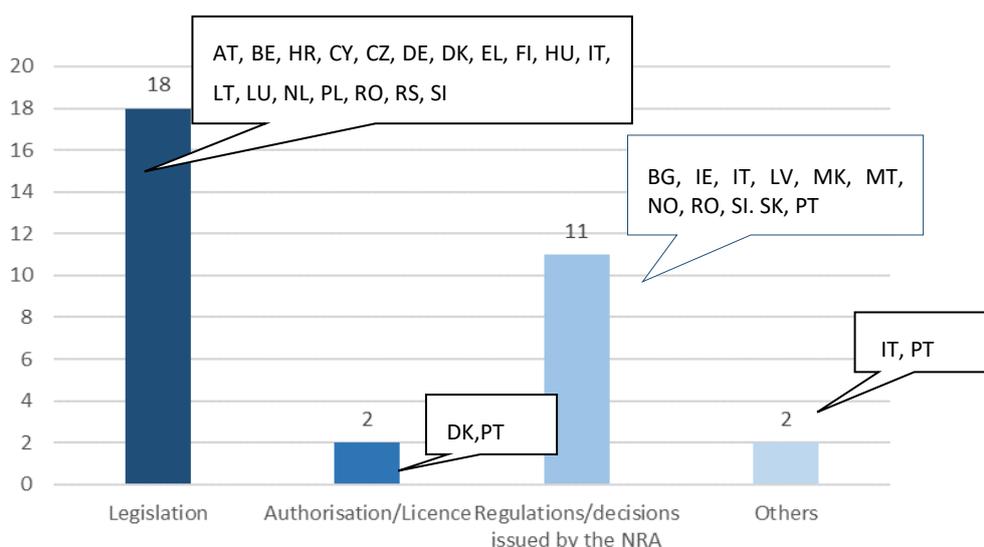
- one collection letterbox per number of inhabitants depending on the type of settlement (a difference is made between urban and rural areas) (BG, CY, EL, IE, IT, HU, LV, SI, SK, PT)
- maximum distance between letterboxes and postal users and the number of inhabitants per letterbox (CZ, NL)
- maximum distance between letterboxes (HR)
- the number of letterboxes must always “meet the demands of the users” (DK, LU, PL, RS)
- number of collection letterboxes per community/locality (BE, MK, RO, PT), with additional criteria for LT in rural area per inhabitants
- maximum distance between letterbox and postal user (AT, DE, MT), reasonable distance in case of FI.

There are additional criteria in Austria and Poland with respect to the needs of mobility-restricted persons. In Norway, there is a requirement to ensure good accessibility, including the deployment of a sufficient number of collection letterboxes within its geographic area of coverage.

The requirements for installing letterboxes can be found mainly in legislation in 60% of the answers. In 33% of the countries those requirements are set in regulations or decisions issued by the NRA. In Italy, besides legislation and regulation, criteria are defined in the Service Contract 2020-2024 between the Ministry of Economic Development and Poste Italiane S.p.A. Also in Portugal, ANACOM's decision on the objectives concerning the density of the postal network and minimum services provided, is under the concession contract signed between the Portuguese State and the USP.

The figure below shows type of legal act where the requirements or standards for ensuring an adequate number of collection letterboxes are mainly defined.

Figure 19 - Type of legal act that regulates the criteria for installing letterboxes



In more than 93% of the countries the time of collection of postal items is marked on the collection letterboxes. In Ireland the Latest Time of Posting (for next working day delivery) is marked on each access point, but not the actual collection time. There is no obligation to

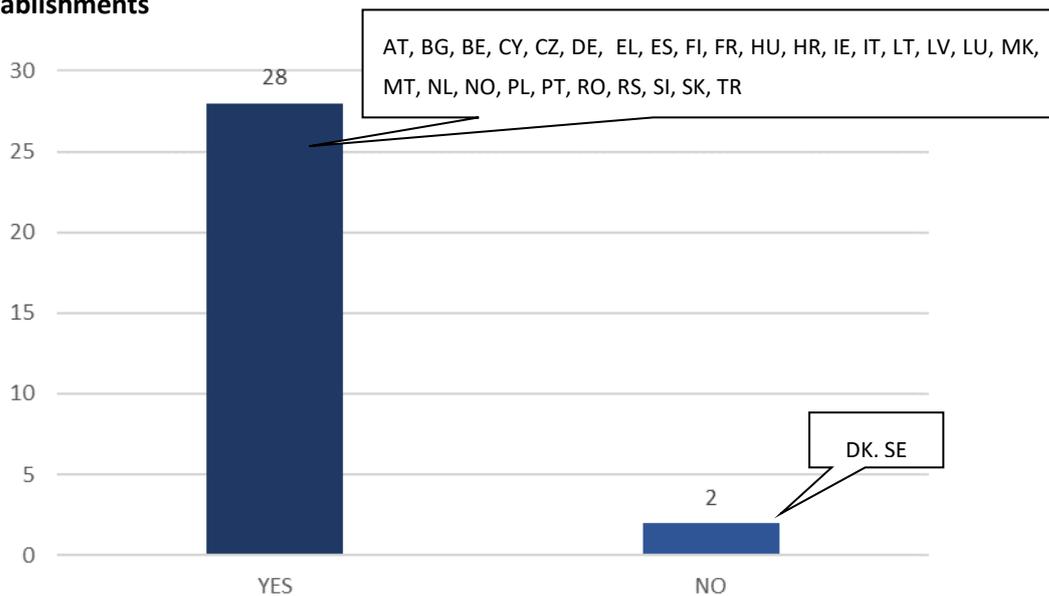
mark information on letterboxes in Denmark and Norway.

4.3.2. Points of contact

In the European legislation²⁹ it is defined that each Member State is obliged to ensure that the density of contact and access points meets the needs of the users and to ensure the availability of a universal postal service as a service of general interest. In practice, these contact points are organised by postal operators as postal establishments, or as agencies or retail stores by third parties, or by the mailman (directly provided services). The importance of having a universal postal service was particularly confirmed during the crisis period (COVID-19 pandemic). Postal services enabled residents to be socially included and to satisfy their basic needs, which indicates that, despite new technologies, postal services are still essential services for all citizens, especially in remote areas.

The requirements to ensure that an adequate (minimum) number of postal establishments is provided by the USP regarding contact points are defined in the majority of the countries (93%). Exceptions are Denmark and Sweden.

Figure 20 – Requirements or standards to ensure an adequate number of points of contact/postal establishments



²⁹ 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”.

The requirements to ensure an adequate number of postal establishments and standards for setting up these facilities of each country are very different. In most countries, a combination of criteria is used, which depend on geographical and demographic specifics. For this reason, these requirements are grouped in most common criteria to gain an overview at the European level:

- number of postal establishments per locality/municipality (EL, FI, MT, NO, PT, RO)
- one postal establishment per number of inhabitants, which could depend on the size of the area and on whether there are differences between rural and urban areas (BG, LV, PT, RS, TR)
- maximum distance that one has to travel to the nearest postal establishment (LT, IT, PT)
- minimum number of post offices, providing UPS or full range of postal services (NL, PT)
- the density of post offices and access points corresponds to the needs of users (CY, LU)
- combination of criteria per number of inhabitants and maximum distance especially in rural areas (CZ, DE, HR, PL, RS, SI, SK)
- population percentage at a certain distance from the postal establishments (AT, BE, FR, HU, NL, PT, SI).

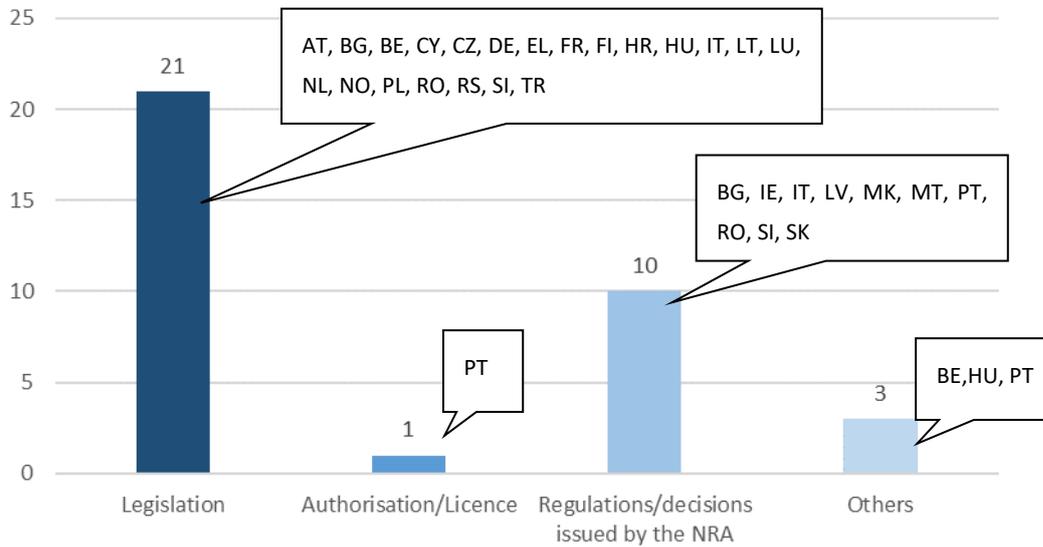
The specified number of postal establishments on the entire territory is also an additional criterion in several above-mentioned countries (AT, BE, CZ, DE, FR, HR, RS). In Italy there is a prohibition to close post offices located in rural and mountain areas. In Ireland the NRA has issued a direction to the USP setting out the access density requirements for post offices.

More than 66% of the respondents' answers state that the legal requirements, standards, or obligations in place to ensure that an adequate (minimum) number of postal establishments is provided by the Universal Service Provider, are defined in legislation.

The fact that the criteria for determining an adequate number of points of contact are defined in regulation or decisions issued by the NRA is mentioned in 28% of answers.

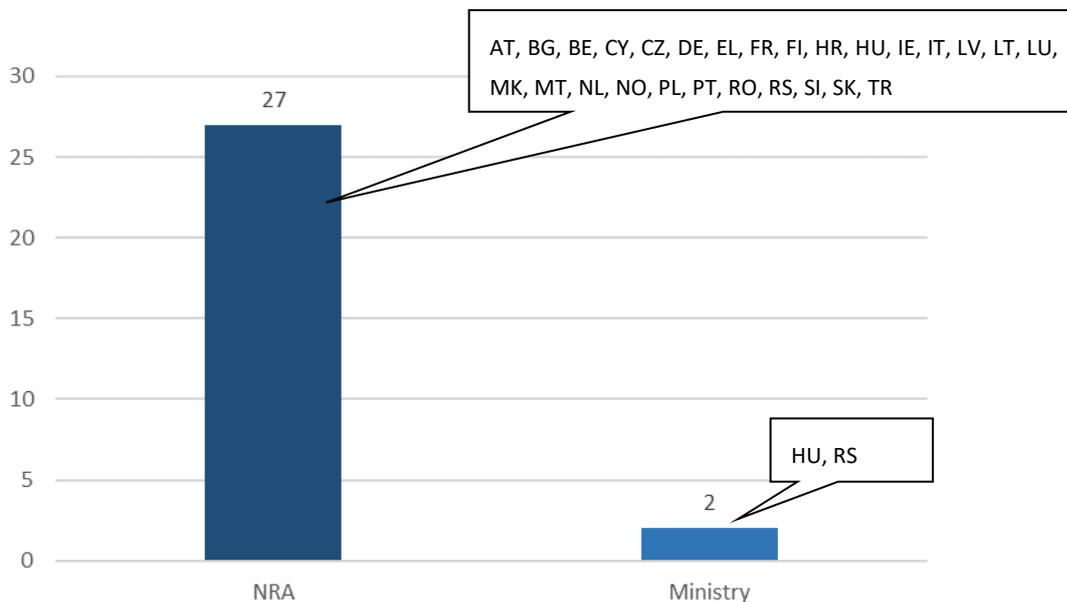
Belgium's, Hungary's and Portugal's cases show that there is an additional requirement in the category "others": management contract between the USP and the Belgian State, Universal Postal Public Service Contract in Hungary and the concession contract signed between the Portuguese State and the USP.

Figure 21 - Requirements on ensuring an adequate number of points of contact (postal establishments provided by the Universal Service Provider)



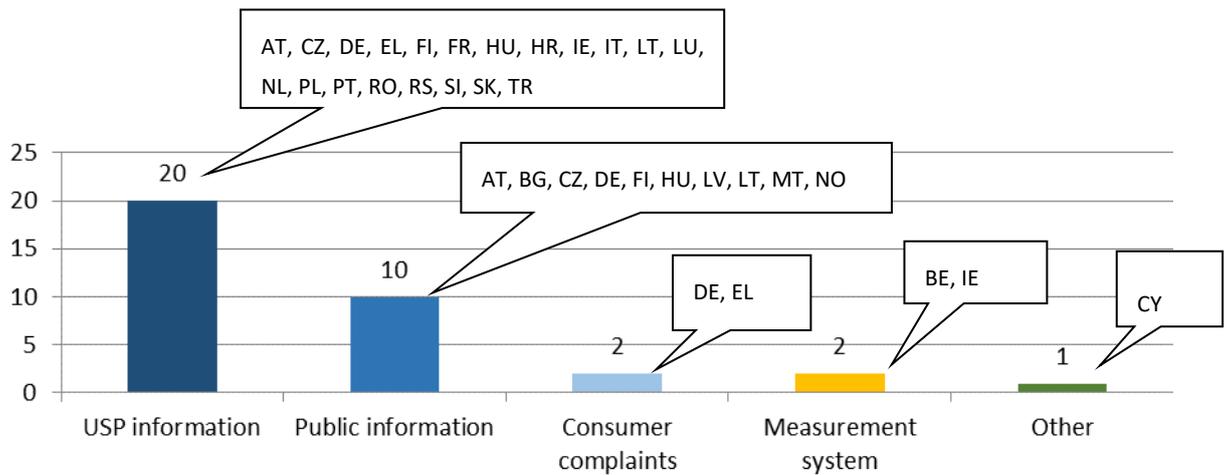
More than 93% countries at European level stated that the NRA is the authority responsible for checking compliance with the requirements regarding an adequate number of postal establishments provided by the Universal Service Provider on the national territory. Exceptions are Hungary and the Republic of Serbia where both the competent Ministry and the NRA have specific roles. In Hungary, the NRA reviews information provided by the USP based on the Universal Postal Public Service Contract (UPPSC). The Ministry checks compliance with the UPPSC in an ad hoc manner and contingently or in the event of a special examination. In the Republic of Serbia, the NRA checks compliance, but the Ministry has the power to impose measures, and prevent closing.

Figure 22 - Entity entitled to check compliance with the requirements regarding an adequate number of points of contact/postal establishments



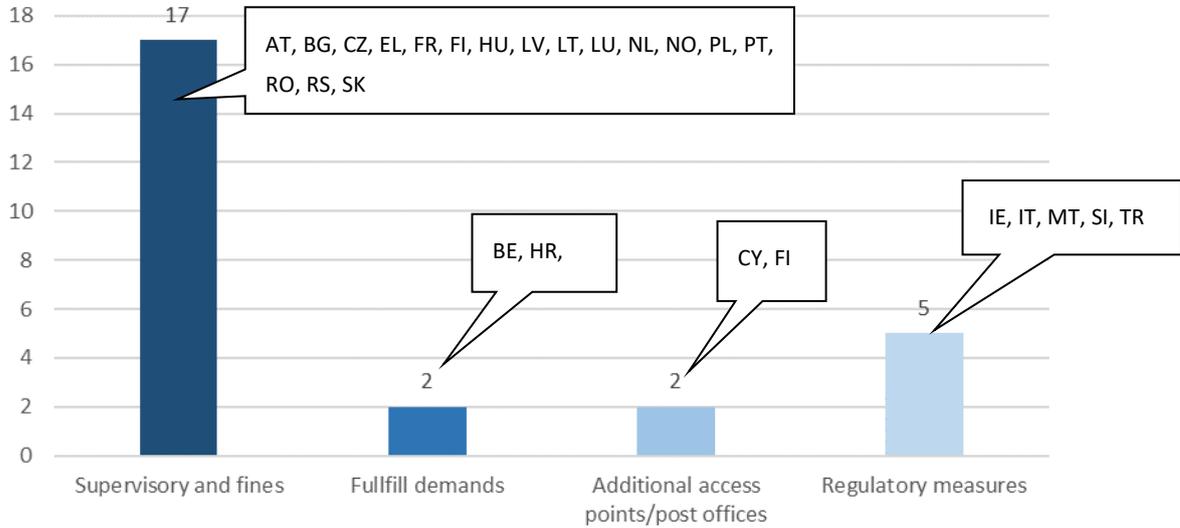
NRAs perform the compliance test based on USP information (57%) and publicly accessible information (29%). There was a combination of both types of information, but some countries listed other criteria: 5.8% of the responses refer to complaints by users, and 5.8% mentioned some kind of measurement system (for example: QoS, “routing method measures”), and Cyprus stated other information. Austria and Lithuania use geographic information systems for testing compliance with requirements. The table shows data for countries per criterion, although some mentioned more than one criterion, or a mix thereof.

Figure 23 - Type of information used as a basis for compliance with the requirements regarding an adequate number of points of contact / postal establishments



In case of non-compliance with the requirements regarding an adequate number of points of contact the competent authority takes gradual supervisory measures and has the power to impose fines and sanctions (more than 64% of respondents). The rest of the countries indicated other reasons such as: requirement to fulfil demands, or requiring the opening of additional access points, or imposing corrective regulatory measures to prevent the closure of postal establishments. In the Republic of Slovenia, an authorised person of the NRA orders measures to remedy the irregularities and deficiencies within a time limit. The authorised person specifies and acts as an administrative violation body in accordance with the act governing the violations or proposes the institution of proceedings on the grounds of the violation.

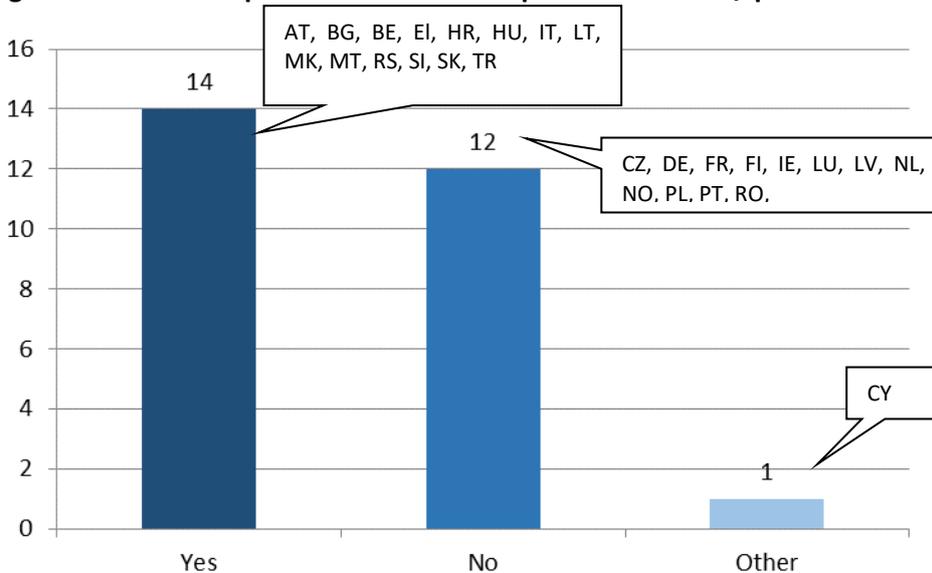
Figure 24 - Type of measures that entities in charge of checking compliance with the requirements could impose



In Luxemburg the NRA is not entitled to impose a permanent closure or to prevent the closure of postal establishments. The NRA may impose a temporary ban up to 1 year to carry out certain postal activities as an administrative sanction.

Based on the answers, 52% countries stated that the competent entity has the power to prevent the closure of postal establishments, as opposed to 44% countries which answered that the competent entity does not have the power to prevent it.

Figure 25 - Power to prevent the closure of points of contact / postal establishments

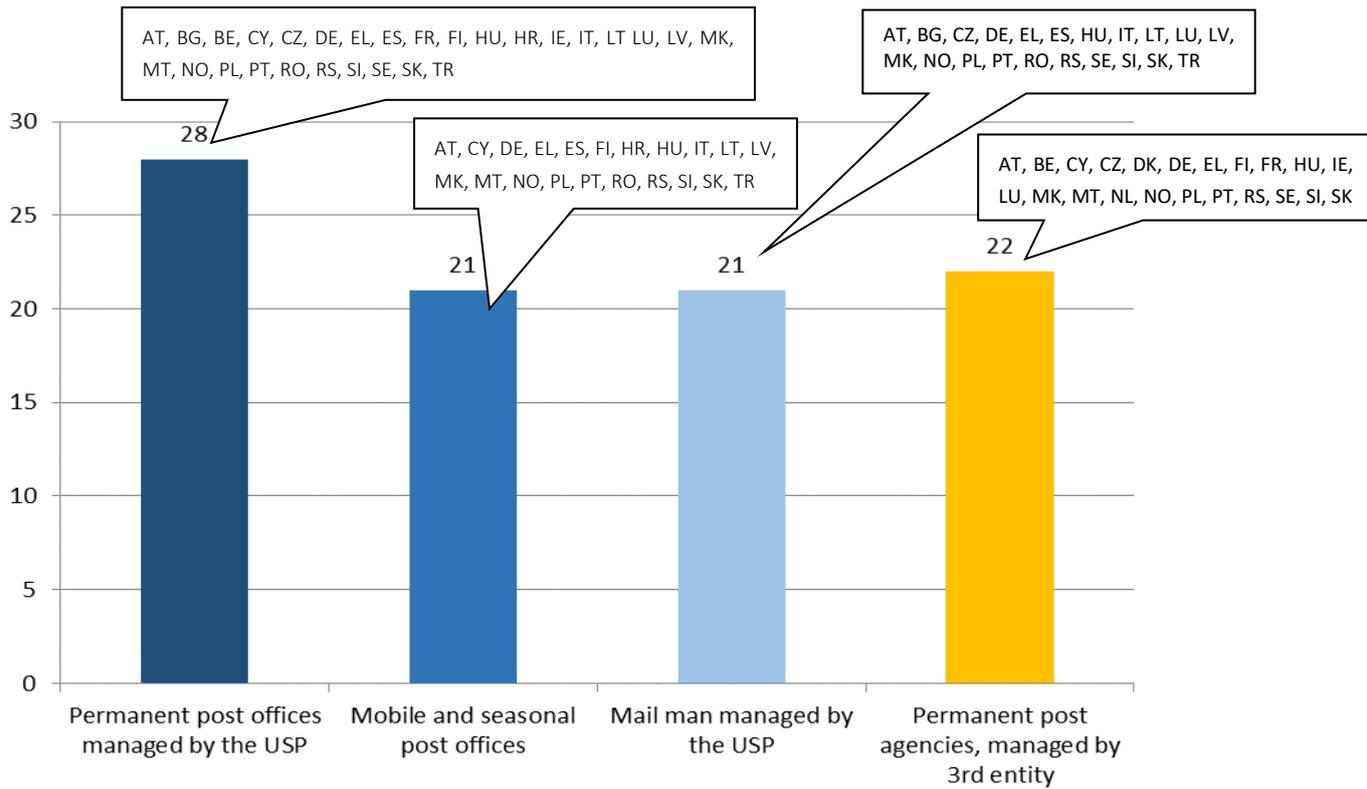


The analysis shows that the most common type of point of contact based on the responses are permanent post offices managed by the USP (more than 93% of respondents), followed by permanent post agencies managed by a third party. The combination of type of points of contact per country are shown in the table below.

Figure 26 - Types of points of contact / postal establishments of the USP per country

Types of points	Number	Country
All types of points	10	AT, CZ, DE, HU, MK, NO, PL, PT SI, SK
-Permanent post offices managed by the USP -Mobile and seasonal post offices -Mailman managed by the USP	6	ES, LV, LT, IT, RO, TR
-Permanent post offices managed by the USP -Mobile and seasonal post offices -Permanent post agencies, managed by third parties	5	CY, EL, FI, MT, RS
-Permanent post offices managed by the USP -Mailman managed by the USP -Permanent post agencies, managed by third parties	2	LU, SE
-Permanent post offices managed by the USP -Mobile and seasonal post offices, managed by USP	1	HR
-Permanent post offices managed by the USP -Permanent post agencies, managed by third parties	3	BE, FR, IE

Figure 27 - Types of points of contact / postal establishments

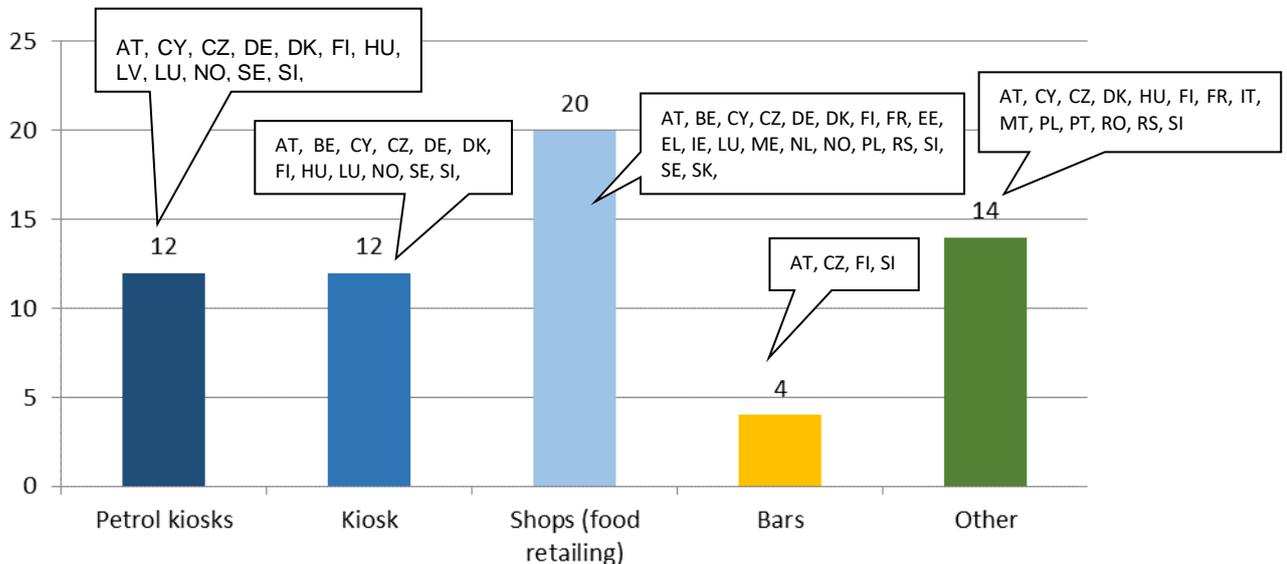


In the Netherlands there are no traditional post offices, instead there are service points that are in majority managed by 3rd parties and partly by the USP.

Postal agencies managed by third-party entities are located in food retail shops, in 69% of the respondents' answers.

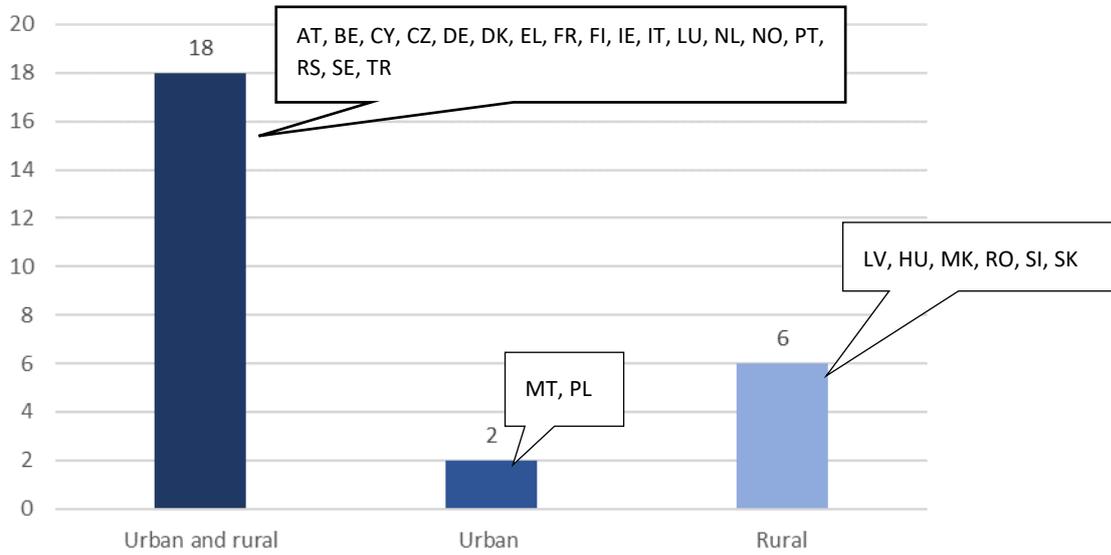
More than 44% of the respondents stated that the postal agencies are organised in other ways such as municipal offices, town halls, railway stations, supermarkets, tourist info points, pharmacies, bookstores.

Figure 28 - Types of post agencies managed by third-party entities



The figure below illustrates the location of post agencies managed by a third party. They are mainly situated in the whole country (72%) and for 20% of countries in rural areas.

Figure 29 - Location of permanent post agencies, managed by 3rd-party entities



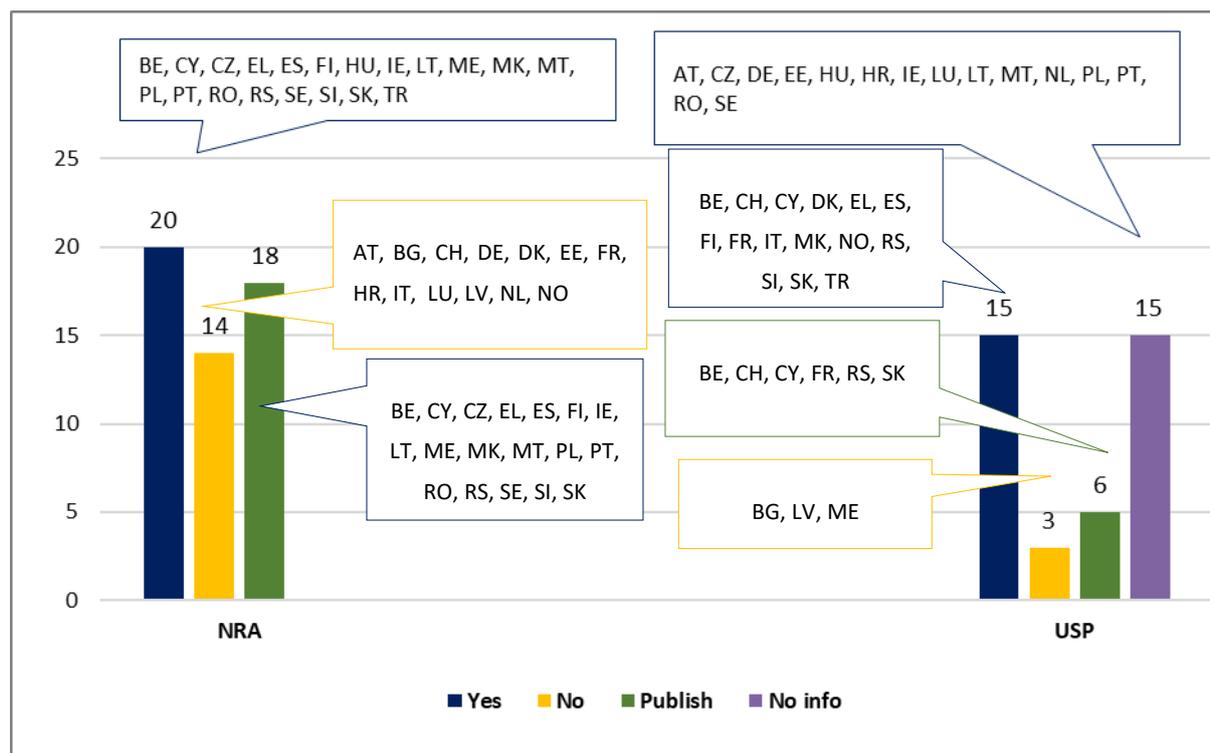
4.4. Monitoring of consumer satisfaction

19 NRAs are monitoring indicators of consumer satisfaction (Belgium, Cyprus, Czech Republic, Finland, Greece, Hungary, Ireland, Latvia, Lithuania, Malta, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden and Turkey), but only 17 of these publish the respective results (all except Hungary and Turkey).

12 universal service providers had carried out users satisfaction measurement studies (Belgium, Cyprus, Denmark, France, Italy, Latvia, North Macedonia, Norway, Serbia, Slovakia, Slovenia and Spain), of which 7 providers also published their results (the USPs from Belgium, Cyprus, Denmark, France, Italy, Serbia and Slovakia). Regarding the other NRAs, 3 pointed out that they have no monitoring system and 15 reported that they have no information on this.

The figure below highlights the overall situation regarding the monitoring of consumer satisfaction in Europe, in 2021.

Figure 30 – Monitoring of consumer satisfaction conducted by NRAs and USPs in 2021



Annex 5 contains data on how NRAs conduct these surveys and links where the information published can be found, though many of these links lead to documents written only in the language of the country concerned.

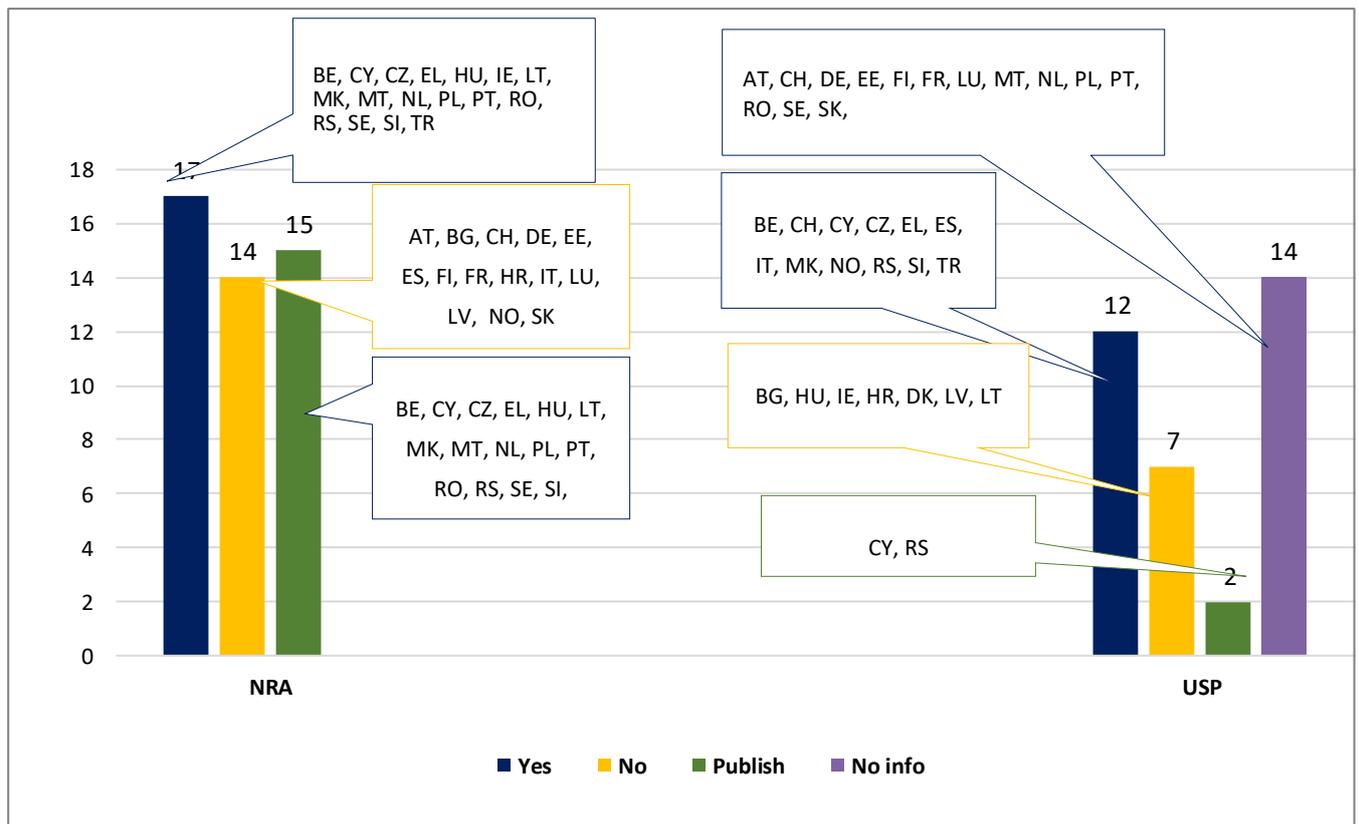
4.5. Surveys regarding customers' needs

17 NRAs indicated that they conducted such surveys in the last few years (Belgium, Cyprus, Czech Republic, Greece, Hungary, Ireland, Lithuania, Malta, the Netherlands, North Macedonia, Portugal, Poland, Romania, Serbia, Slovenia, Sweden and Turkey) and almost all of them published the results (all except Hungary and Turkey). The periodicity of these surveys varies a lot, and they are mostly carried out on an ad hoc basis to serve regulatory needs.

Only 7 NRAs indicated that the USP conducts surveys regarding customers' needs (Belgium, Cyprus, Greece, Norway, Serbia, Slovenia and Spain), but the large majority of other NRAs (21) do not have information regarding this issue.

The figure below highlights the overall situation regarding the monitoring of customers' needs in Europe, in 2021.

Figure 31 – Surveys on customers' needs conducted by the NRAs and USPs in 2021



Annex 6 contains data on how NRAs conduct these surveys and links to the location where the information published can be found, even if many of these links lead to documents written only in the language of the country concerned.

4.6. The impact of e-commerce on the postal field

In the past few years, the volumes of postal mail traffic have been constantly regressing except for the parcels/small packages flows, which increased due to the development of e-commerce. This market development has led to the improvement of the quality of services and the implementation of new services by integrating modern technologies to meet the increasing complexity of users' needs.

In this context, Regulation 2018/644 of the European Parliament and of the Council on cross-border parcel delivery services was adopted in April 2018, aiming at encouraging the development of e-commerce, this area being regarded as a safeguarding tool for postal services at a European level.

Many regulators in the Member States have no powers in terms of regulation and monitoring of the e-commerce field. The only notable exceptions in terms of statistical data collection that include postal indicators determined by the flows generated by e-commerce are the NRAs from Cyprus, Greece, North Macedonia, Romania and Serbia. Consequently, Member States do not have accurate data on the development of e-commerce, and they have not conducted specific studies on the impact of e-commerce on the postal services sector.

In most European countries, the bodies that have powers as to e-commerce regulation and monitoring are the ministries of communications. However, in most cases, it seems that consumer protection organisations and various e-trader associations hold the most consistent data regarding electronic commerce.

In these conditions, one of the conclusions drawn from the answers received is that in most cases, the NRAs do not monitor the e-commerce postal flows. The National Authority from Bulgaria (CRC) has tried to collect data on e-commerce postal flows in the previous years, but this process is characterised as extremely difficult and therefore CRC has not yet reached conclusive results.

Another notable example is Romania: starting from 2016, ANCOM decided to set up a tool for monitoring the impact of e-commerce on the postal field. This study became annual, and it has been publicly available on the Authority's website since 2018. From a methodological point of view, the study carried out by ANCOM³⁰ comprises over 99% of the postal parcel market in terms of volume and revenues and generated relevant conclusions also regarding the quality of the parcel services and the impact of e-commerce on the Romanian postal market annually. This exercise of monitoring the quality of parcel services and the impact of e-commerce has gone through stages of successive improvement, so that it currently produces data on the share of traffic volume and revenue generated by online commerce in the volume of real mail traffic and total revenue of postal service providers. In addition, during 2020, the suppliers from the research panel were requested to provide for the first time data regarding the international shipments generated by e-commerce. The study for 2021 will be finalised and published on the ANCOM's website at the end of 2022.

It should also be noted that the Hungarian authority, NMHH, is currently conducting a study, which will probably be published by the end of the year.

The most important aspect revealed by the study of the answers received to this year's questionnaire is that the number of respondents who consider the need to implement a common method of monitoring the impact of electronic commerce on the postal services markets in Europe, increased to 20 (NRAs from Bulgaria, Croatia, Cyprus, Czech Republic, France, Germany, Hungary, Ireland, Italy, Latvia, Lithuania, North Macedonia, Norway, Poland, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden and Turkey).

In considering a possible common methodology for monitoring the impact of e-commerce on the postal fields in the European states, several potentially necessary indicators were suggested for evaluation: the traffic volumes generated by the e-commerce, the revenues collected from the processing of postal items generated by e-commerce, the types of services and postal items generated by e-commerce, the complaints and the types of users.

As in the previous years, all the NRAs that have expressed the need to implement a common monitoring methodology have responded positively to all suggested indicators (e-commerce generated postal traffic, e-commerce generated postal revenues, e-commerce generated types of postal items, e-commerce generated users' complaints, etc.).

³⁰ https://www.ancom.ro/en/studii-de-piata_5507

Since the feedback received over the years is similar, the following general conclusions can be reiterated:

- The majority of postal regulators in Europe do not have direct responsibilities in the field of electronic commerce.
- Certain regulators have shown an interest in recent years in creating monitoring tools for identifying the e-commerce flows, but with very few exceptions, these efforts are in an incipient stage and pose different legal and practical difficulties from country to country.
- More and more authorities (20) consider that there is a need to produce a common method for monitoring the impact of e-commerce on the postal service market. This would involve establishing specific indicators to be subject to annual data collection: traffic, revenue, complaints, etc., so as to ensure the comparability of the results at European level.
- However, a group of 10 authorities does not promote the idea of a common approach at European level on this issue, the arguments of this opinion group being in line with the following:
 - the NRAs do not have powers regarding the electronic commerce;
 - it is not possible for a postal service provider to accurately identify its traffic flows and revenues generated by e-commerce, so there is a risk that the conclusions drawn from this data collection may not be relevant;
 - the field of e-commerce is growing rapidly and therefore, in the perspective of the coming years, it will obviously generate flows and revenue increases in the field of postal services. Thus, at least for the moment, the specific identification of emerging trends in the market is not necessary;
 - if in the future there is a need to monitor e-commerce in the postal networks, the European Regulation on the processing of cross-border parcels could become a useful tool for monitoring also domestic markets.

5. Current situation regarding 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 collected by NRAs.

5.1. Competence of NRAs regarding complaint handling

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

As in previous years, the situation regarding the responsibilities of the regulatory authorities has hardly shifted. The number of NRAs responsible for handling user complaints has remained more or less unchanged in recent years - a large majority of NRAs (more than 78%) have the competence to do so, with most of them handling complaints about all postal services.

However, even in 2021, the NRA's powers in this area are not always clear. In Luxembourg, the NRA intervenes only in cases of loss, theft, damage or non-compliance with quality standards. In the Netherlands, there is still no explicit legal basis for dealing with complaints from users. If the NRA deems it relevant for the performance of its tasks (monitoring compliance with the provisions of the Postal Act of 2009, the Competition Act and the relevant consumer laws), it may address these issues.

Although a large majority of NRAs deal with user complaints, it is important to note that there are a not so small number of countries (18%) where the handling of complaints does not fall within their competence. While these NRAs have the basic task of regulating the postal sector, they are not empowered to investigate and independently resolve individual complaints about postal services.

In Ireland, consumers must have exhausted the complaints procedures of the postal service provider, before the NRA can accept such complaints for dispute resolution.

In Romania, the NRA has legal remit to accept complaints from users that have not been satisfactorily resolved or have not been addressed by the postal service providers but has no competence to establish liability and determine the compensation.

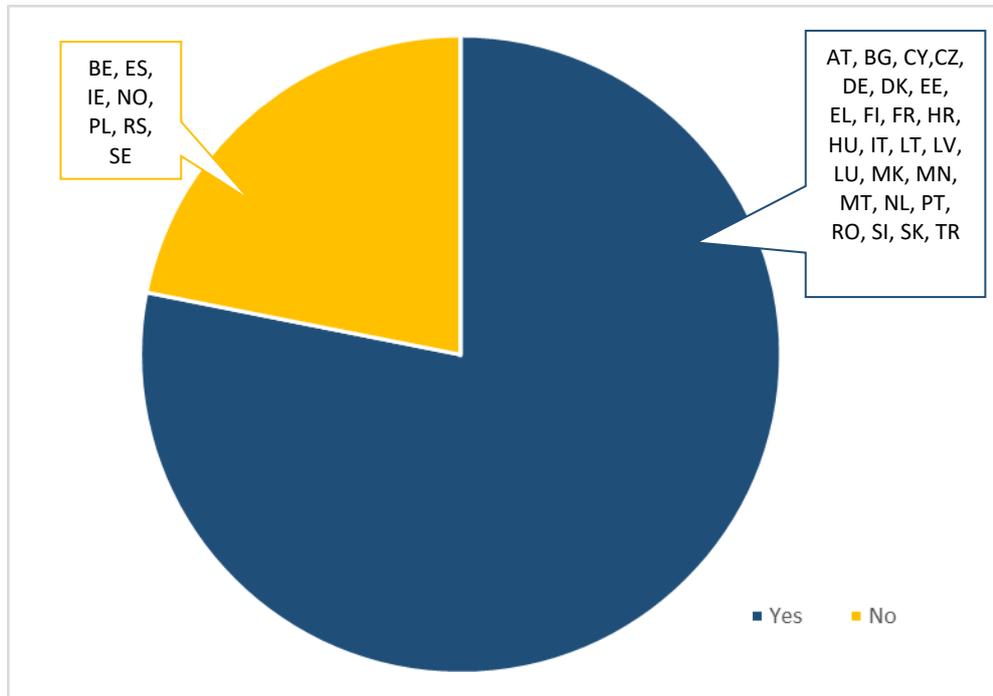
In Serbia, the postal operator deals with complaints, and if the user is not satisfied with it he can report an objection to the NRA to mediate in an out-of-court dispute resolution.

In Spain, the responsibility falls on the Ministry (Ministerio de Transportes Movilidad y Agenda Urbana) with regards to the USP. The Ministry elaborates an annual report on complaints.

In all countries where NRAs are responsible for handling user complaints, there are procedures for resolving complaints.

The chart below illustrates the situation regarding the competence and respective scope of the NRAs in complaint handling in 2021.

Figure 32 – NRAs dealing with users' complaints in 2021

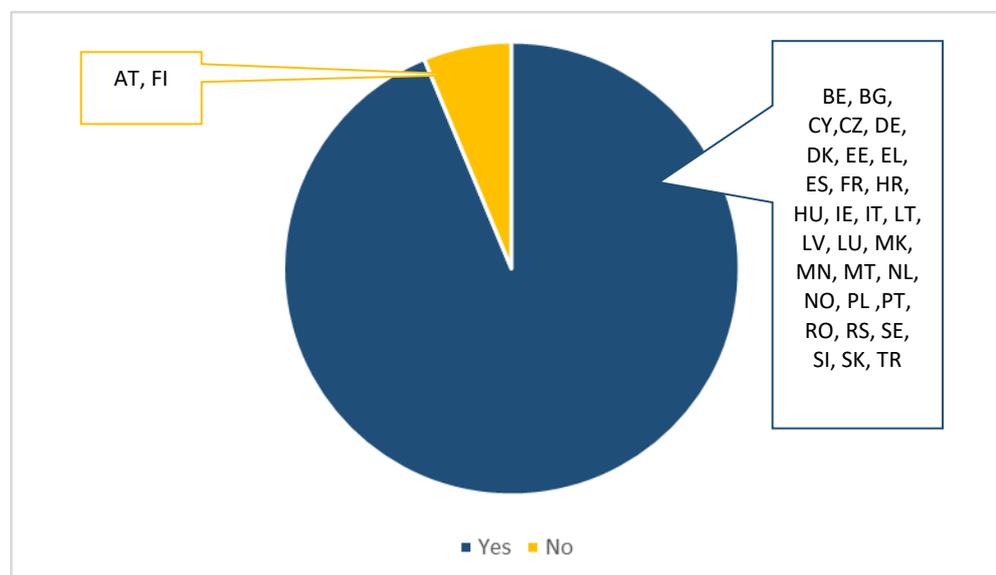


5.2. Information provision and access to complaint handling and dispute resolution

This subchapter analyses the information available to users on complaint-handling procedures, compensation schemes and means of dispute resolution, while also examining possible rules on complaints handling and alternative dispute resolution schemes.

The chart below shows that in 2021, nearly all countries have regulations requiring postal service providers to publish information about complaint procedures, compensation schemes, and dispute resolution. This obligation applies not only to USPs, but also, for the most part, to all postal service providers operating in the universal service area (OPSP.US), as well as other postal service providers (OPSP). This duty is generally implemented by publishing information on the provider's website as well as in the general terms and conditions (GTC).

Figure 33 – Obligations to provide information about complaint handling in 2021



With respect to the regulation on complaint-handling procedures, the situation is stable in the last few years. Most NRAs (94%) indicated the establishment of such regulations (BE, BG, CY, CZ, CH, DE, DK, EE, EL, ES, FR, HR, HU, IE, IT, LT, LU, LV, MK, ME, MT, NL, NO, PL, PT, RO, RS, SE, SI, SK, TR). Usually, the existing complaint handling procedures include all postal service providers. In some countries, the procedures for handling complaints are regulated only to a limited extent. In Austria and Finland there are no legal provisions for this field.

In general, among the complaints handling procedures, mostly the principles, channels for lodging complaints and deadlines are regulated.

The scope of application of alternative (or out-of-court) dispute resolution mechanisms (ADR) has been at a very similar level in the last few years. In 2021, ADR was available in 28 countries, covering almost the entire territory of Europe. Only two countries are not included in these statistics - in DK and HR dispute resolution mechanisms are still not available for the consumers.

Participation in out-of-court resolution of consumer disputes is usually voluntary and the consent must be expressed by both parties involved in the dispute. In five countries (BE, CZ, LV, PT and RS) the ADR mechanism is mandatory.

In out-of-court resolution of consumer disputes, in some countries different legal solutions are used.

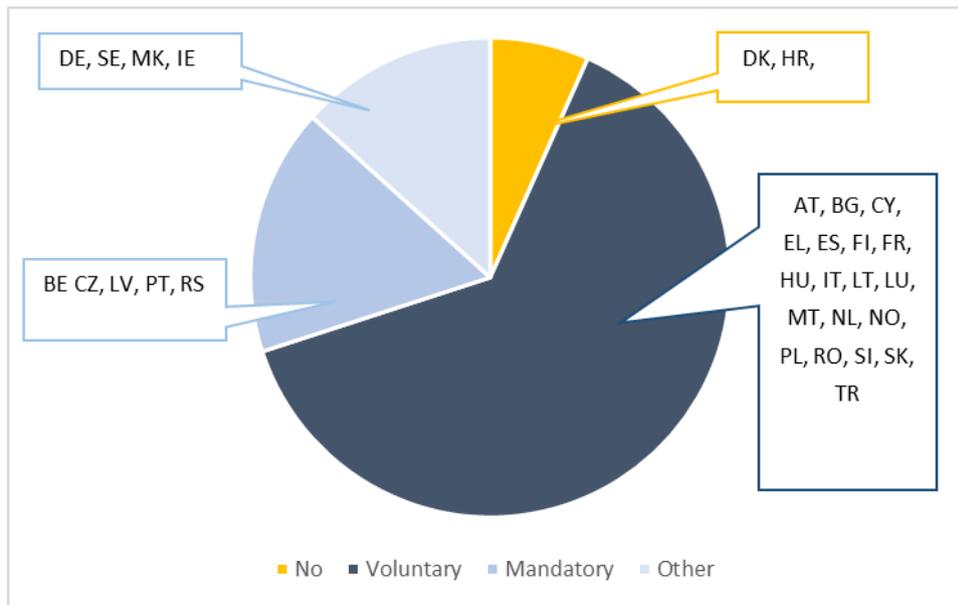
For example, in Sweden, the National Board for Consumer Disputes (ARN) (<https://www.arn.se/om-arn/Languages/english-what-is-arn/>) is responsible for dispute resolution issues.

In Germany, the postal service provider has been obliged to participate in the dispute resolution procedure since March 2021 if a consumer submits a request for dispute resolution. In all other cases, participation remains voluntary.

In Ireland, the complainant can choose the dispute resolution option and/or a small claims court.

In Malta, if the end-user feels aggrieved by the way his complaint has been handled by his service provider and is not satisfied, he can file a complaint with the Consumer Complaints Tribunal to obtain compensation for the damage allegedly suffered. This court has the authority to rule on disputes between customers and traders.

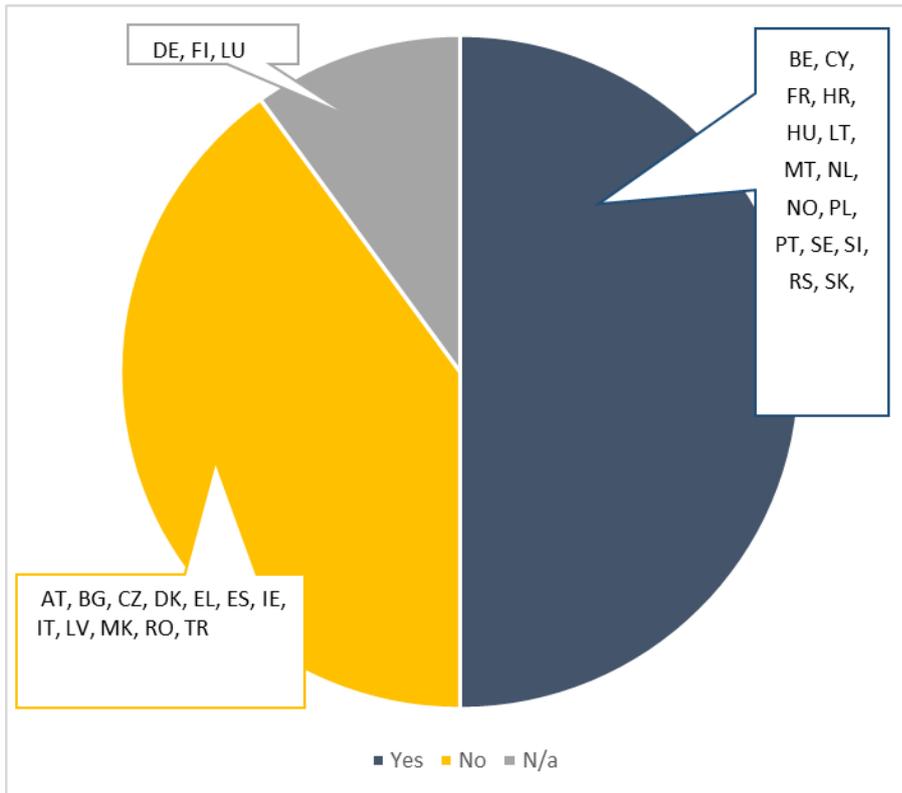
Figure 34 – Alternative (or out-of-court) dispute resolution in 2021



Referring to the issue of the standards, it is worth noting that the CEN standard EN 14012 on complaints handling principles relating to both domestic and international postal services, is often used. The CEN standard also provides guidelines for compensation procedures and damage compensation.

The situation has slightly changed compared to 2020. Now, half of the responding countries (15 out of 30) apply the standard EN 14012 (BE, CY, FR, HR, HU, LT, MT, NL, NO, PL, PT, SE, SI, RS, SK), Norway on a voluntary basis. Usually, the standard is implemented by the USPs.

Figure 35 – Implementation of CEN standard EN 14012:2008



5.3 Compensation schemes for individual customers

Subchapter three looks into the existing compensation schemes for individual customers, with a focus on their framework, scope and disclosure.

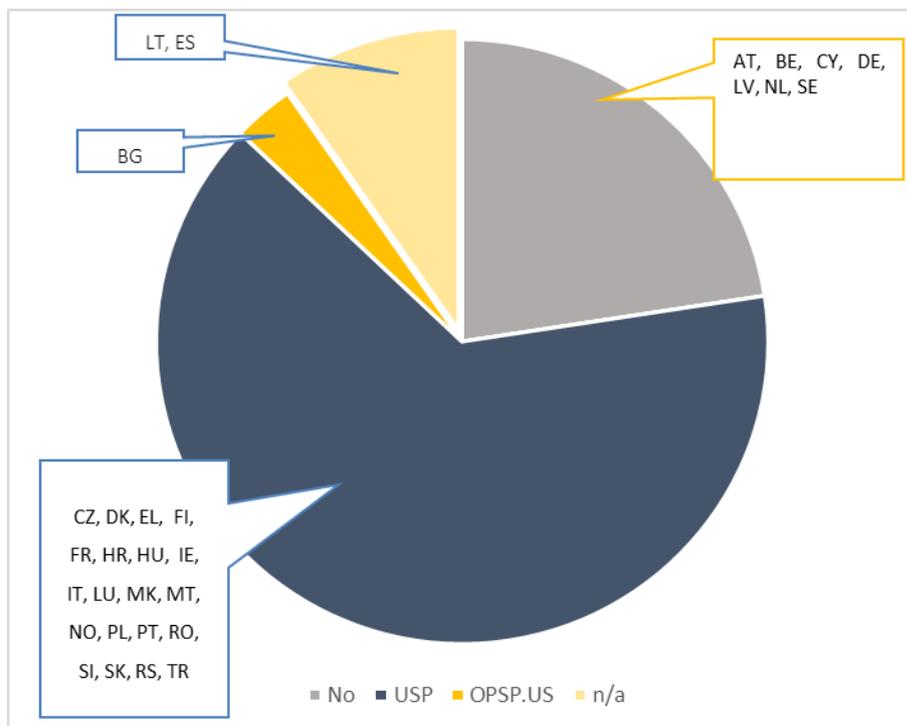
There were no major changes compared to the previous year. Compensation schemes are mostly used on an obligatory basis. The obligation for a specific compensation scheme to be applicable to individual consumers is broadly evenly spread out between all postal operators (USP, OPSP.US, OPSP), although the USPs are the operators that are the most active in this area (61% of the countries).

In two countries (MT, PT) – only the USP is involved in compensation schemes, which means that other operators may not be able to meet the expectations of their customers.

The main reason for failure to apply an obligation for a specific compensation scheme to individual consumers was the lack of appropriate provisions in postal law. Compensation schemes are often determined by the postal operators and included in the contract for the provision of services.

In Austria, the scope of liability is determined within the framework of general terms and conditions and civil law. In Estonia, the compensation scheme is also not anchored in the Postal Act. The provider sets it out in the general terms and conditions, and the NRA has to coordinate it.

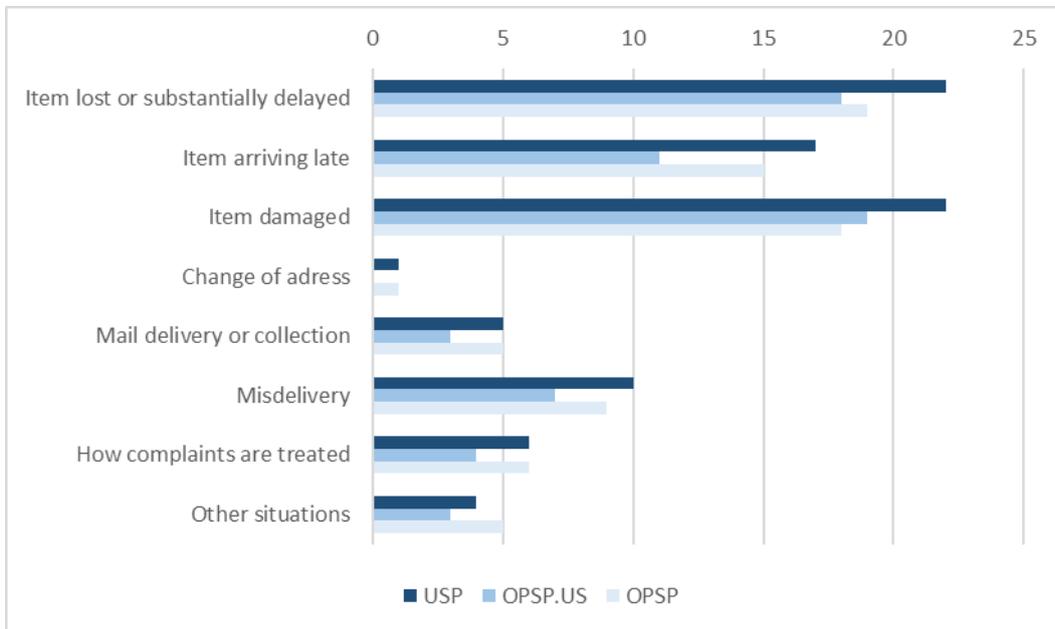
Figure 36 – Mandatory compensation schemes for individual customers in 2021



The situation concerning the types of service failures covered by existing compensation schemes is very similar to that in the previous reference period.

The figure below shows that in the majority of countries the compensation covers, first of all, damaged (68%) items and lost or substantially delayed (68%) items. These types of schemes are ensured at a similar level by all types of operators. The competitors (OPSP.US and OPSP) slightly give way to the USPs in this respect. This may suggest that the competitors of the USPs attach increasing importance to the issue of complaint handling. Compensation schemes for items arriving late are also quite well established. Other types of service failure are represented to a lesser extent, regardless of the type of provider. For example, other situations include events such as stolen items, non-observance of the deadline for a refund of the cash on delivery or return of the package without a valid reason. Compensation schemes are usually applied both to letters and parcels.

Figure 37 – Coverage of existing compensation schemes for individual customers per type of service failure in 2021



Note: The list of countries per postal service provider and type of service failure covered is available in the appendices (annex 8).

5.4. Indicators on complaints

This chapter addresses the indicators that are being collected on complaints, focussing on existing obligations to measure and or publish this information by the USPs and the indicators that NRAs monitor.

5.4.1 Obligation to measure and publish indicators on complaints by USPs

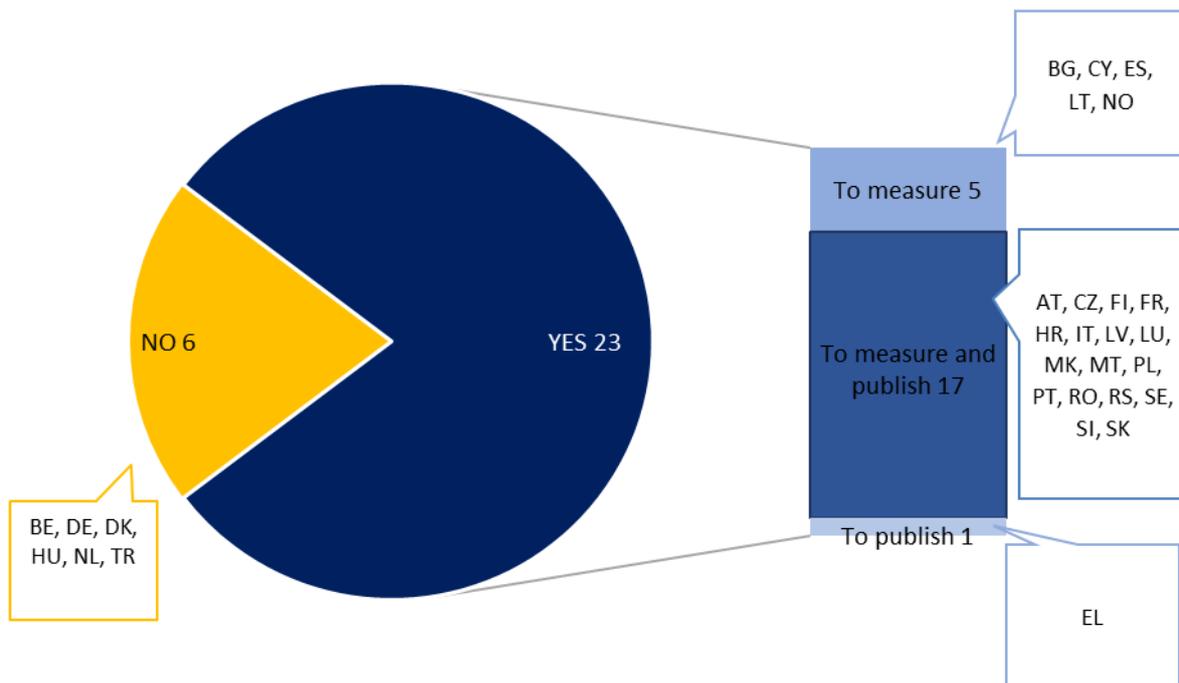
In most countries (79%), USPs are obliged to measure and/or publish indicators on the complaints they receive.

In about half the countries, this obligation is set out in primary or secondary legislation and in around a quarter of the countries it derives only from NRA decisions, including licence conditions.

Frequently mentioned are the following indicators: number of complaints received, including resolved/unresolved or justified, compensations paid, complaints per category such as lost items, delayed items, damaged items, misdelivered items, behaviour and competence of postal employees, access to postal services, manner of handling complaints, etc. Less frequently mentioned were the average time of response to complaints or the number of complaints that went to ADR.

In almost a quarter of the countries USPs are not obliged to measure or publish information on the complaints they receive and we were not aware of other mechanisms or obligations in place to make this information available for postal service users.

Figure 38 – Obligation to measure and publish indicators on complaints by USPs in 2021

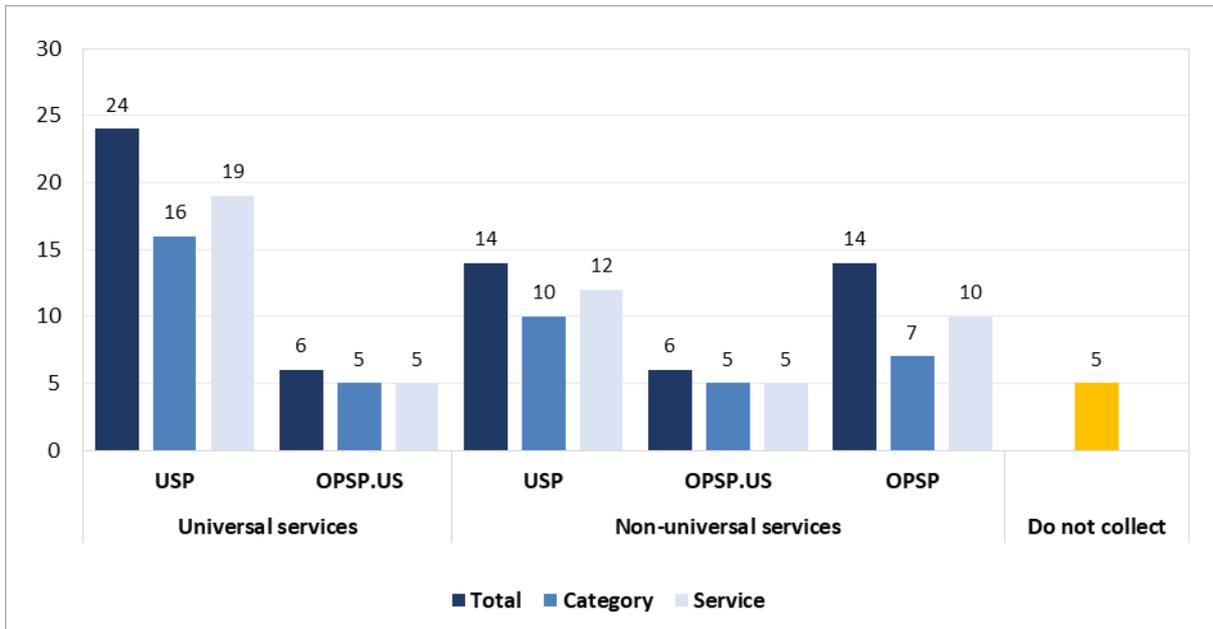


5.4.2 Indicators collected by NRAs

In 2021, less NRAs mentioned they were not collecting indicators on complaints received by postal service providers, one less when compared with 2020 –; in total 16% are not collecting this information. When compared with the previous year, generally fewer NRAs are collecting data about the type of service both for universal services and non-universal services.

As in previous years, the figure below shows that the large majority of NRAs collecting this information still gather data on the complaints received by USPs on universal services (93%), mostly regarding the total number of complaints. Fewer NRAs collect this information about non-universal services (58%).

Figure 39 – Collection of data by NRAs on the number of complaints in 2021

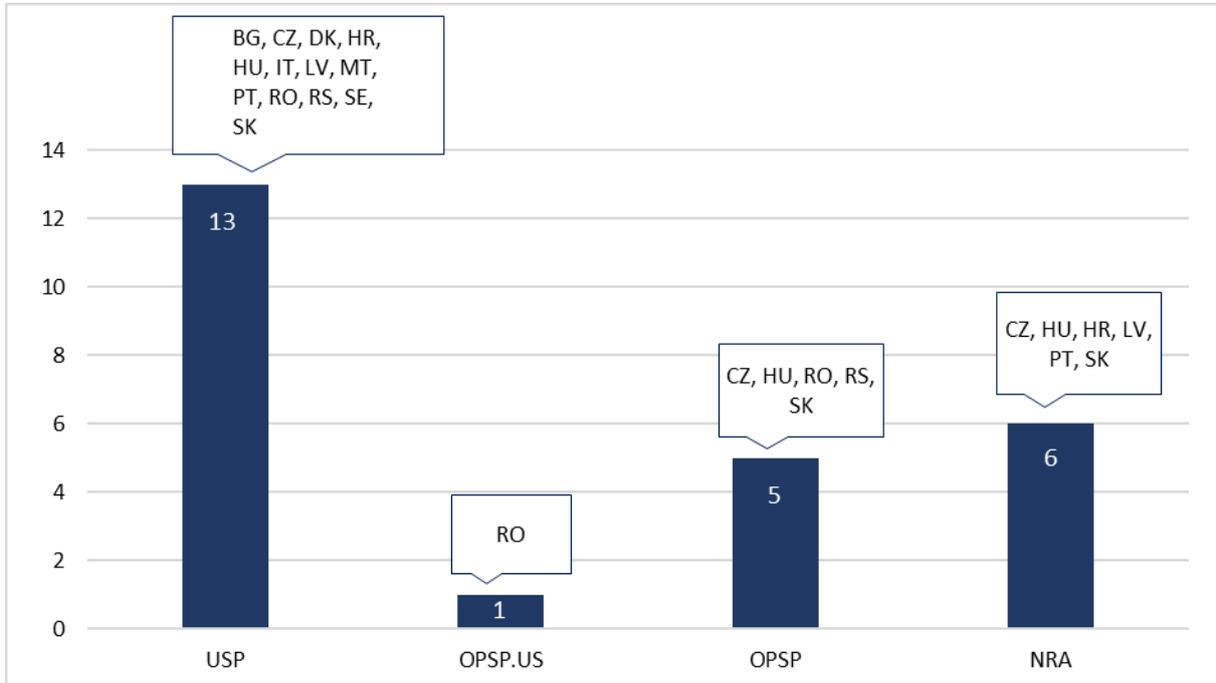


Note: The list of countries where NRAs collect data on complaints and from which postal service providers is available in the appendices (annex 9.1).

More NRAs are collecting data on the number of complaints about cross-border services submitted to the NRA, one more when compared with 2019 – in total 45% indicated they collected this information in 2021.

As shown in the figure below, 45% of NRAs collect information about cross-border complaints received by the USP and very few collect this information from other postal service providers, a similar situation to the one portrayed in previous years.

Figure 40 – Collection of data by NRAs on the number of complaints about cross-border services in 2021



5.5. Data on complaints collected by NRAs

This chapter focuses on the number of complaints about postal services registered by USPs and by NRAs in the last three years per country and per number of inhabitants in each country³¹, with a closer look on the complaints targeting cross-border services.

When analysing these data, it is essential to recognise that a simple comparison between the figures submitted by countries could be misleading as the data may reflect the diversity and specificity of the postal markets in the relevant countries – not only different volumes and structure, but also differences in the legal and regulatory framework as well as divergent national practices/procedures applied. In 2020, but also in 2021, the impact of COVID-19 should be considered, despite being really different across the countries regarding the scope, duration and coverage of the lockdown and other types of measures taken by the Governments and at EU level.

5.5.1 Complaints received by USPs

The following figure shows the complaints received by USPs about universal services per country per 1,000 inhabitants.

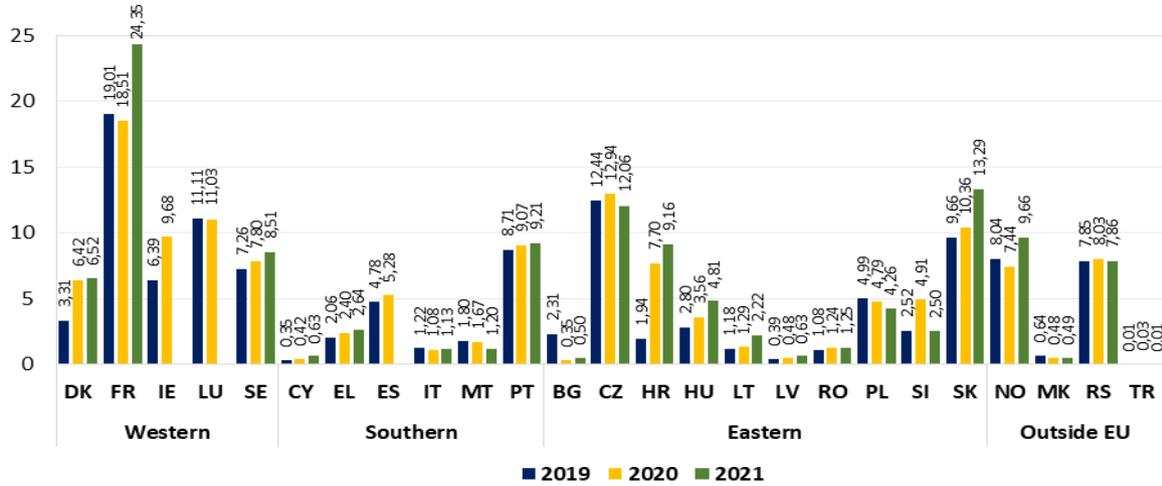
In 2021, the complaint rate ranged from below 1 – Turkey (0.01), Republic of North Macedonia (0.49), Bulgaria (0.50), Cyprus and Latvia (both 0.63) – to above 10 – France (24.35), Czech Republic (12.06) and Slovakia (13.29). Western countries show an average of 13.12 complaints per 1,000 inhabitants, far from the average seen in Southern (2.96) and Eastern countries (5.07).

Overall, the rate of complaints was around 5.5 complaints per 1,000 inhabitants.

In 2021, the USPs registered an increase in the number of complaints when compared with 2020 in the majority of countries (51%). Overall, the complaints in these countries increased by 21%. In the remaining 49%, the number of complaints decreased when compared with 2020. The increase in the usage of postal services, particularly parcels, that was boosted by the lockdown measures on one hand and the effect that these measures may have had on the exercise of the right to complain on the other hand may explain different impacts of the COVID-19 pandemic in the number of complaints registered by USPs.

³¹ The information on the population of each country that was used is available at <https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en>.

Figure 41 – Complaints received by USPs about universal services per country per 1,000 inhabitants, 2019-2021



Note: The number of complaints received by USPs and the population per country are available in the appendices (annex 9.2).

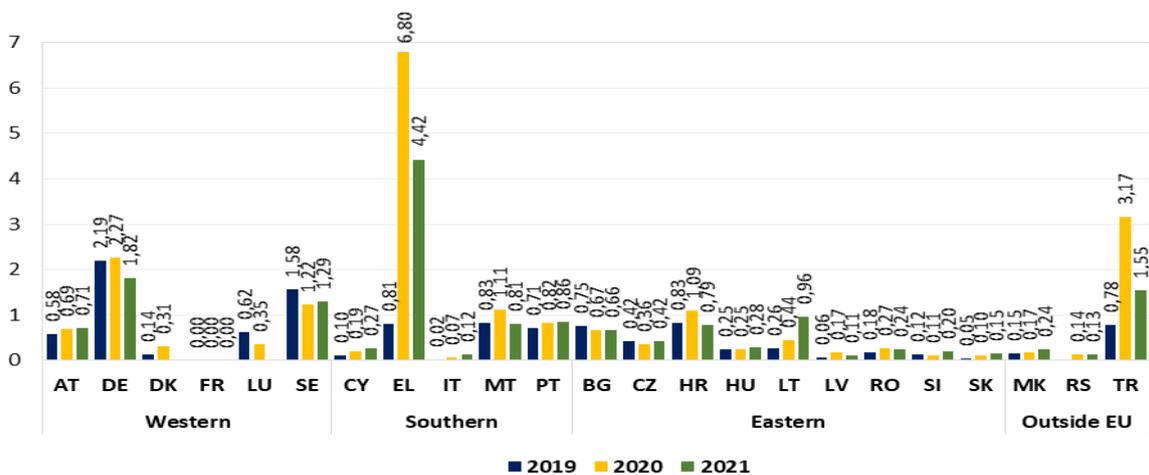
5.5.2 Complaints received by NRAs

The next figure shows the complaints received by NRAs about postal services per country per 10,000 inhabitants.

In 2020, these complaints rates ranged from below 0.1 – France (0.0009) - to above 1 – Greece (4.42), Germany (1.81), Turkey (1.55) and Sweden (1.3). Eastern countries show fewer complaints received by NRAs per 10,000 inhabitants (0.42) than Western (0.96) and Southern (1.3) countries.

In only 7 countries, the NRAs received fewer complaints in 2021 than in 2020. In the remaining 15 countries (68%) the complaints increased in this period. The total number of complaints received by these NRAs in 2021 increased by 42% when compared to 2020.

Figure 42 – Complaints received by NRAs about postal services per country per 10,000 inhabitants, 2019-2021

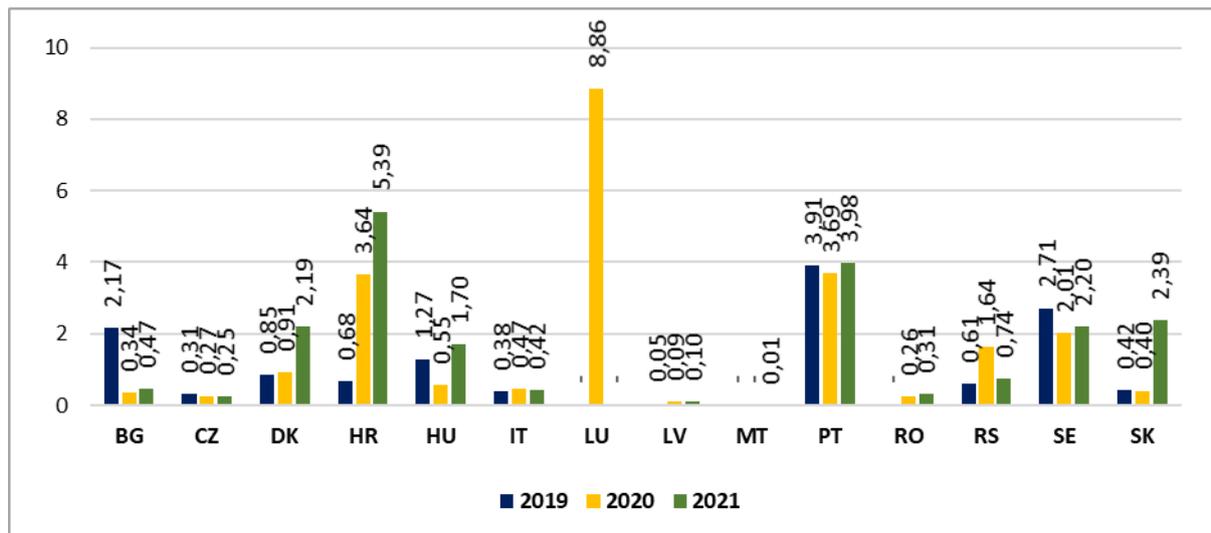


Note: The number of complaints received by NRAs and the population per country are available in the appendices (annex 9.3).

5.5.3 Complaints on cross-border services

Figure 43 presents the number of complaints received by USPs about cross-border services per country per 1,000 inhabitants. In 2021, the rate of complaints per 1,000 inhabitants was 1.44, so higher than in 2020 (0.86). In most countries (64%) the complaints about cross-border services increased in 2021, around 107% increase considering the total number of complaints received by USPs in these countries between 2020 and 2021.

Figure 43 – Complaints received by USPs about cross-border services per country per 1,000 inhabitants, 2019-2021



Note: The number of complaints received by USPs and the population per country are available in the appendices (annex 9.4).

The large majority of NRAs mentioned that the complaints regarding cross-border services focus on lost, damaged or substantially delayed items, the same as in previous years. Less mentioned were customs/VAT handling and the way complaints are handled.

ANNEX 1 – Methodology of each country for the measurement of the quality of service of domestic services provided by the USP in 2021

Services	Standards	Count	Country	%
Single-piece priority mail	EN 13850	23	AT, BE, BG, CY, CZ, DE, EL, ES, FR, HR, IT, LT, LU, LV, MT, NL, NO, PT, RO, RS, SE, SK, SI	79%
Single-piece non-priority mail	EN 13850	5	FR, HR, LU, RS, SI	17%
	EN 14508	5	BE, BG, DK, IT, PT	17%
	EN 13850 and EN 14508	1	SK	3%
Bulk mail	EN 14534	3	FR, MT, PT	10%
	EN 13850	1	LU	3%
Parcels	EN 13850	3	AT, BG, ES	10%
	TR 15472	2	MT, SI	7%
	EN 13850 and EN 14508	1	SK	3%
	Other	3	FR ³² , PT ³³ , RS ³⁴	10%
Registered mail	EN 13850	1	LU	3%
	EN 13850 and EN 14508	1	SK	3%
	Other	2	FR ³⁵ , PT ³⁶	7%
Cross-border mail ³⁷	Methodology based on EN 13850	15	AT, BG, CY, EL, ES, FR, HR, IE, IT, LU, MT, NO, PT, RO, SI	52%
	UPU measurement system-GMS world	1	RS	3%

³² Methodology that may be audited (based on a track and trace system).

³³ Using the track and trace information of all real parcels sent.

³⁴ Internal methodology of PPO.

³⁵ Traceability system implemented by the USP (may be audited).

³⁶ Based on track and trace information of all mail items sent as registered mail.

³⁷ If the UNEX-Study Intern Post Corporation (IPC) system was mentioned, then the use of standard EN 13850 was considered, because they used this standard in 2021.

ANNEX 2 – Force majeure and other exceptions which have an impact on the measurement of the quality of service

2.1. Number of days of measurement impacted by force majeure events in 2021 and reasons

Country	Number of days accepted by the NRA	Geographical area affected	Reasons	Number of days denied by the NRA
BE	11	National	Strike and demonstration	0
BG	From January to the end of April and from October to the end of December 2021	National	COVID-19	7 months
HR		Regional	Due to the geographical specificities of the Croatian territory, HAKOM had recorded incident situations that could affect the measurement results, and the most common reasons of these incidents are caused by extreme weather conditions.	0
EL	4	National	General strike, extreme weather conditions	13
IE	3	Regional	Storm Barra, which impacted some counties of the Country	3
MK	1	National	No information	0
PT	The whole year of 2021	National	Pandemic situation	0
SI	166	National	Declared epidemic of COVID-19 (01.01.2021 - 15.06.2021)	0
SK	NA	National	COVID-19 (25 items excluded from measurement from January to March 2021)	0

2.2. Other exceptions that had an impact on the measurement of the quality of service in 2021

Country	Description
BG	Before the start of the measurement, the NRA provides a list of official holidays for the year in order to be excluded from the calculations.
EL	National (official) or local/regional holidays are normally deducted during the calculation of quality measurements on any given time period.
FI	A universal service provider must have the right to deviate from the frequency of collection and delivery provided for in section 17 if the household is located in a difficult terrain in the archipelago or in a wilderness area. The collection and delivery referred to in section 17 of these households must take place at least once a week. The maximum number of households within the scope of the deviation may not exceed 1,000 households.
HU	Quality measurements are counted for working days.
IE	Derogation days applied after consultation: Entire Country – New Year’s day 1 January, Public Holiday 17 March, All Public/Bank Holidays, 25, 26 and 27 December.
MK	Holidays and Sundays
RO	All localities located under exceptional geographical conditions are exempted from performing quality measurements. 1185 localities in the mountain area.

ANNEX 3 – Data regarding quality of service measurement and audit**3.1. Information about measurement and audit regarding transit time of single-piece priority mail**

	Who commissions or orders the measurement? (NRA/USP/Other)	Who pays for the measurement? (NRA/USP/Other)	Is the measurement audited?	Who is responsible for ensuring the audit (NRA/USP/Other)
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
BG	NRA	NRA	No	-
CY ³⁸	USP	USP	Yes	USP
CZ	USP	USP	Yes	NRA
DE	USP	USP	Yes	USP
EL	NRA	NRA	Yes	NRA
ES	USP	USP	Yes	NRA
FI	Other	USP	No	-
FR	USP	USP	Yes	Other
HR	USP	USP	Yes	NRA
HU	Other	USP	Yes	USP
IE	NRA	NRA	Yes	NRA
IT	NRA	USP	Yes	USP
LT	USP	USP	No	USP
LU	USP	USP	Yes	Other
LV	USP	USP	No	USP
MT	USP	USP	Yes	NRA
NL	USP	USP	Yes	USP
NO	USP	USP	No	-
PL	NRA	NRA	Yes	NRA
PT	USP	USP	Yes	NRA
RO	USP	USP	Yes	USP
RS	NRA	NRA	No	-
SE	USP	USP	Yes	USP
SI	USP	USP	Yes	NRA
SK	USP	USP	Yes	NRA
Total of Yes	-	-	21	-

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

³⁸ The NRA makes sure that 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? (NRA/USP/Other)	Who pays for the measurement? (NRA/USP/Other)	Is the measurement audited?	Who is responsible for ensuring the audit (NRA/USP/Other)
BE	USP	USP	Yes	NRA
BG	NRA	NRA	No	-
DK	NRA	USP	No	-
FR	USP	USP	Yes	Other
HR	USP	USP	Yes	NRA
IT	NRA	USP	Yes	NRA
LT	USP	USP	No	-
LU	USP	USP	Yes	Other
MK	NRA	USP	Yes	NRA
PL	NRA	NRA	Yes	NRA
PT	USP	USP	Yes	NRA
RS	NRA	NRA	No	-
SI	USP	USP	Yes	NRA
SK	USP	USP	Yes	NRA
Total of Yes	-	-	10	-

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

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

	Who commissions or orders the measurement? (NRA/USP/Other)	Who pays for the measurement? (NRA/USP/Other)	Is the measurement audited?	Who is responsible for ensuring the audit (NRA/USP/Other)
BE	USP	USP	Yes	NRA
DE	USP	USP	Yes	USP
FR	USP	USP	Yes	Other
IT	NRA	USP	Yes	USP
LT	USP	USP	No	-
LU	USP	USP	Yes	Other
MT	USP	USP	No	-
PT	USP	USP	Yes	NRA
SK	USP	USP	Yes	NRA
Total of Yes	-	-	7	-

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

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

	Who commissions or orders the measurement? (NRA/USP/Other)	Who pays for the measurement? (NRA/USP/Other)	Is the measurement audited?	Who is responsible for ensuring the audit (NRA/USP/Other)
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
BG	NRA	NRA	No	-
DK	USP	USP	No	-
ES	USP	USP	Yes	NRA
FR	USP	USP	Yes	Other
HU	USP	USP	Yes	USP
IT	NRA	USP	Yes	USP
LT	USP	-	No	-
LV	NRA	Other	No	-
MT	USP	USP	No	-
MK	NRA	USP	Yes	NRA
NO	USP	USP	No	-
PL	NRA	USP	Yes	NRA
PT	USP	USP	Yes	NRA
RS	NRA	USP	No	-
SI	USP	USP	Yes	NRA
Total of Yes	-	-	10	-

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

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

	Who commissions or orders the measurement? (NRA/USP/Other)	Who pays for the measurement? (NRA/USP/Other)	Is the measurement audited?	Who is responsible for ensuring the audit (NRA/USP/Other)
AT	USP	USP	Yes	NRA
BE	USP	USP	Yes	NRA
BG	USP	USP	Yes	Other
CY	USP	USP	Yes	USP
EL	Other	Other	Yes	Other
FI	USP	USP	-	-
FR	USP	USP	No	-
HR	USP	USP	No	NRA
HU	USP	USP	Yes	USP
IE	Other	Other	Yes	Other
IT	Other	USP	Yes	Other
LT	USP	USP	-	-
LU	USP	USP	Yes	Other
MT	USP	USP	No	-
NO	USP	USP	No	-
PT	USP	Other	Yes	NRA
RO	USP	USP	No	Other
RS	USP	Other	-	-
SE	USP	USP	No	USP
SI	USP	USP	No	-
Total of Yes	-	-	10	-

Note: Considering countries that have a measurement.

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

Unfortunately, many of the documents published at the Internet addresses mentioned below are only available in the languages of these countries.

BG	https://crc.bg/files/bg/trudnodostypni.pdf
DK	Published on collection boxes
EE	https://www.riigiteataja.ee/en/eli/520062017019/consolide
GR	Published in local post offices
IE	https://www.comreg.ie/media/dlm_uploads/2015/12/ComReg14135.pdf
IT	http://www.agcom.it/documents/10179/2209608/Delibera+395-15-CONS/a9012437-c38c-4baa-8fd8-257472caba41?version=1.2
RO	https://www.ancom.ro/uploads/links_files/lista_localitati_situate_in_conditii_exceptionale_iulie_2020.pdf
RS	https://www.ratel.rs/uploads/documents/empire_plugin/Pravilnik%20o%20uslovima%20i%20na%C4%8Dinu%20obavljanja%20po%C5%A1tanskih%20usluga.pdf
SK	https://www.teleoff.gov.sk/spokojnost-zakaznikov/

Annex 5 – Monitoring of consumer satisfaction

Surveys (periods and methodologies)	
BE	https://www.ibpt.be/en/operators/postal/universal-and-non-universal-postal-services/communication-of-17-december-2013-of-the-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
CZ	The NRA monitors the number of complaints on postal services annually and publishes them in the annual report. The USP is obliged to publish the number of complaints about the US divided into specified categories. The NRA publishes these data in an annual report. This obligation is set by Decree No. 433/2012 Coll.
FI	Up to now, surveys have been made annually but in the future it is planned to make them every other year.
FR	The NRA has no information regarding consumer satisfaction surveys conducted by the USP. However, the USP measures each year several customers satisfaction indicators (Net Promoter Scores) related to some specific services offered (for instance, 2nd presentation of a parcel or a registered mail when the delivery at home was not possible the first time). Some information about these Net Promoter Scores are published by the USP and available here: https://le-groupe-laposte.cdn.prismic.io/le-groupe-laposte/bd2834f7-d4d2-4bed-9af9-b0be677d7df6_TBSU+Publication_interactif+2021_OK.pdf
GR	Consumer satisfaction survey is conducted only ad hoc and not on a regular basis. <ul style="list-style-type: none"> • Market survey relating to both individuals (retail) and business customers was conducted in 2011 regarding customer satisfaction and needs. • 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) and a list of proposals was extracted to reinforce the postal market. • Market survey relating to both individuals (retail) and business customers regarding satisfaction from the provisioning of universal services in Greece was commissioned by EETT in 2018 and conducted in 2019. • Market survey regarding consumers' opinions on the Universal Postal Services framework reform was conducted in 2019. https://www.eett.gr/opencms/export/sites/default/EETT/Postal_Services_n/PostalMarket/GreekPostalMarket/PostalMarketResearch2012/PostalMarketResearch2019.pdf
IE	https://www.comreg.ie/industry/postal-regulation/postal-framework/postal-research/
LT	https://www.rrt.lt/wp-content/uploads/2021/01/Ataskaita-RRT-202012-1.pdf
MT	https://www.mca.org.mt/articles/business-perception-postal-survey-2019; https://www.mca.org.mt/articles/2019-mca-perceptions-survey-postal-services-large-bulk-mailers-0; https://www.mca.org.mt/articles/mca-consumer-perception-survey-postal-services
PL	https://archiwum.uke.gov.pl/zapotrzebowanie-polakow-na-uslugi-pocztowe-22729

PT	The latest results (field work - November 2016) are available at the following link: https://www.anacom.pt/render.jsp?contentId=1404532&languageId=1 .
RO	Annual tracking surveys and other ad-hoc studies: https://statistica.ancom.ro/sscpds/public/alldocuments/marketstudy?lang=en
RS	The NRA conducts periodically external independent surveys on customers' satisfaction and needs in cooperation with specialized marketing companies. Untill 2021 we conduct six researches (2010, 2011, 2013, 2015, 2020, 2021) on the needs of users of universal postal service and satisfaction. Surveys that we conducted in 2020 and 2021 include reasearch for all consumers and all type of services US and express services (in 2021: "Research of the level of satisfaction of needs of individuals as users of postal services"). The survey covers issues relevant to the functioning of the postal market and the role of the main participants, in particular customers. The latest published data can be read at the following link: https://www.ratel.rs/cyr/page/cyr-studije-iz-oblasti-postanskih-usluga
SK	The NRA does not monitor consumer satisfaction, but the NRA imposes this obligation on 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. The latest published data can be read at the following link: https://www.teleoff.gov.sk/spokojnost-zakaznikov/
SI	https://www.akos-rs.si/posta/raziscite/porocila-raziskave-in-analize/posta/novica/raziskave-s-podrocja-postnih-storitev-za-leto-2021
ES	http://data.cnmec.es/datagraph/
SE	https://www.pts.se/globalassets/startpage/dokument/icke-legala-dokument/rapporter/2019/post/befolknings-anvandning-av-posttjanster-2019-pts-er-2019_9.pdf

Annex 6 – Surveys on customer needs and market surveys

Unfortunately, many of the documents published at the Internet addresses mentioned below are only available in the languages of those countries.

Country	Surveys (periods and methodologies)
BE	<p>Consumer needs will be measured on a three-yearly basis, comprising both quantitative and qualitative research. Both residential and professional users are in the scope of the research. The latest published data on this can be read at the following link:</p> <p>https://www.bipt.be/file/cc73d96153bbd5448a56f19d925d05b1379c7f21/082a710a619cd39fb5a373467b1647ca9c460b82/Mededeling_belgische_postale_eindgebruiker.pdf</p>
CY	<p>The OCECPR conducts surveys regarding customer needs, as well as market surveys but there is no specific frequency. A new survey is in progress.</p>
CZ	<p>The NRA made a first survey in 2016 to review the need to impose the obligation to ensure the US. In 2018, the NRA conducted market research related to waiting times at the post offices, delivery to the apartment, not only to the address, elasticity of demand related to the increase of the US prices. The outcomes of this research are not public. The latest published data on this can be read at the following link, only in Czech and only the results of the 2016 survey:</p> <p>https://www.ctu.cz/sites/default/files/obsah/ctu/vyzva-k-uplatneni-pripominek-k-zameru-ulozit-jako-povinnost-poskytovat-zajistovat-jednotlive/obrazky/prezkumpodless37odst.4zakonaopostovnichsluzbach.pdf</p>
EL	<p>Market surveys are conducted only ad hoc and not on a regular basis.</p> <ul style="list-style-type: none"> • A study on e-commerce was completed in March 2015 regarding e-commerce users' preferences for parcel delivery services. <p>http://www.eett.gr/opencms/export/sites/default/EETT_EN/Journalists/MarketAnalysis/MarketReview/PDFs/2014.pdf</p> <ul style="list-style-type: none"> • A study on customer needs regarding the provision of universal services in Greece was commissioned by the EETT in 2018 and conducted in 2019. • Market survey regarding consumers' opinions on the Universal Postal Services framework reform was conducted in 2019. <p>https://www.eett.gr/opencms/export/sites/default/EETT/Postal_Services_n/PostalMarket/Greek</p>

	PostalMarket/PostalMarketResearch2012/PostalMarketResearch2019.pdf)
IE	We have monitored this in the course of our Postal Market Surveys. The latest published data on this can be read at the following link: https://www.comreg.ie/industry/postal-regulation/postal-framework/postal-research/
LT	Every two years, an independent consumer survey is commissioned. The latest published data can be read at the following link: https://www.rrt.lt/wp-content/uploads/2021/01/Ataskaita-RRT-202012-1.pdf
MT	https://www.mca.org.mt/articles/business-perception-postal-survey-2019; https://www.mca.org.mt/articles/2019-mca-perceptions-survey-postal-services-large-bulk-mailers-0; https://www.mca.org.mt/articles/mca-consumer-perception-survey-postal-services
NM	http://ap.mk/mk/210317-istrazhuvane-za-potrebite-na-korisnicite-na-univerzalnata-usluga
	Public opinion research agency paid by the NRA, all postal services, every 2 years. The latest published data can be read at the following link: https://www.ekip.me/izvjestaji/istrazivanja.php
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. The ACM submits an annual report (Marktmonitor Post) on its findings to the Minister of Economic Affairs. The latest published data can be read at the following link: https://www.acm.nl/nl/publicaties/post-en-pakkettenmonitor-2018
PL	The UKE is obliged to regularly (every 4 years) conduct surveys on demand regarding the universal service. As mentioned before at the end of 2016, the UKE ordered a survey on customers' (individual and institutional) needs. A similar survey was conducted in 2014, prior to appointing the designated operator. The latest published data can be read at the following link: https://bip.uke.gov.pl/raporty/zapotrzebowanie-polakow-na-uslugi-pocztowe.5.html
PT	ANACOM commissioned two studies in 2017 (conducted by an external company): (1) Study on users' needs on the access to postal establishments and other access points, the purpose of which is to identify and assess the needs of users of postal services in relation to accessibility to postal establishments and other access points in Portugal, including the opening hours of postal establishments; (2) Study on the needs of consumers of postal services, the purpose of which is to identify and assess the needs of residential end-users in the postal sector in Portugal, in particular as regards possible shortcomings in the provision of postal services useful to consumers or in

	<p>identifying elements of the postal service that may no longer be valued by consumers.</p> <p>The first study referred to in 6.1.1 is available at the following link: https://www.anacom.pt/render.jsp?contentId=1413422</p> <p>The second study referred to in 6.1.1 is available at the following link: https://www.anacom.pt/render.jsp?contentId=1413406&languageId=1</p>
RO	https://statistica.ancom.ro/sscpds/public/alldocuments/marketstudy?lang=en
RS	<p>The NRA conducts periodically external independent surveys on customers' satisfaction and needs in cooperation with specialized marketing companies. Untill 2021 we conduct six researches (2010, 2011, 2013, 2015, 2020, 2021) on the needs of users of universal postal service and satisfaction. Surveys that we conducted in 2020 and 2021 include reasearch for all consumers and all type of services US and express services (in 2021: "Research of the level of satisfaction of needs of individuals as users of postal services"). The survey covers issues relevant to the functioning of the postal market and the role of the main participants, in particular customers. The latest published data can be read at the following link:</p> <p>https://www.ratel.rs/cyr/page/cyr-studije-iz-oblasti-postanskih-usluga</p>
SE	https://pts.se/en/documents/reports/post/2020/hur-paverkas-mottagarna-av-varannandagsutdelning---pts-er-2020-29/
SI	<p>Part of survey of users' satisfaction. The latest published data can be read by following the next link:</p> <p>https://www.akos-rs.si/posta/raziscite/porocila-raziskave-in-analize/posta/novica/raziskave-s-podrocja-postnih-storitev-za-let-2021</p>

Annex 7 – Obligations to provide information: countries where postal service providers are obliged to publish information on complaint procedures, compensation schemes and dispute resolution

	Universal Service Provider	Other Postal Service Providers active in the Universal Service area	Other Postal Service Providers
Complaint procedures	BE, BG, CH, CY, CZ, EE, EL, ES, FI, FR, HR, HU, IE, IS, IT, LT, LU, LV, MT, MK, NO, PL, PT, RO, RS, SE, SI, SK	BE, BG, CH, CY ³⁹ , CZ, EL, ES, FR, HR, HU, IE, IT, LV, MT, NO, PL, PT, RO, SI, SK	BE, BG, CY, CZ, DK, EL, ES, FI, FR, HR, HU, IE, IS, IT, LT, LU, LV, MK, MT, PL, PT, RO, RS, SE, SI, SK
Compensation schemes	BG, CY, EE, EL, ES, FR, FY, HR, HU, IE, IS, IT, LT, LV, MT, NO, PL, PT, RO, RS, SI, SK	BG, CY, DK, EL, ES, FR, HR, HU, IE, IT, LV, MT, MK, NO, PL, PT, RO, SI, SK	BG, CY, EL, ES, FR, HR, HU, IE, IS, IT, LT, LU, MT, MK, PL, PT, RO, RS, SI, SK
Dispute resolution	BE, BG, CH, CY, CZ, DE, EE, ES, EL, FR, HU, IE, IS, IT, LT, LU, LV, MK, NO, PT, RO, SI, SK	BE, BG, CH, CY, CZ, DE, EL, ES, HR, HU, IE, IT, LV, MK, NO, PT, RO, SI, SK	BE, BG, CY, CZ, DE, EL, ES, HU, IE, IS, IT, LT, LU, LV, MK, PT, RO, SI, SK
No obligation	DK, IS		

³⁹ The OPSP in Cyprus has a licence to operate, but to this day has not offered any services yet.

Annex 8 – Compensation schemes for individual customers

Countries which have compensation schemes for individual customers

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

Annex 9 – Data on complaints
9.1. NRAs which 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
About Universal Services	Total	BG, CH, CY, CZ, DK, EL, ES, FR, HU, HR, IT, LT, LU, LV, MK, MT, NO, PL, PT, RO, RS, SE, SI, SK, TR	BG, EL, IT, LU, MK, PL, RO	BG, MK, PL, RO, SK
	Category	BG, CH, CZ, DK, ES, FR, HR, IT, LT, LV, MK, MT, NO, PL, PT, RO, RS, SE, SI, TR	BG, EL, IT, MK, PL, RO	BG, MK, PL, RO
	Service	BG, CH, DK, EL, ES, FR, IT, LT, LV, MK, MT, PL, PT, RS, RO, SE, TR	BG, IT, MK, PL, RO	BG, MK, PL, RO
About Non-Universal Services	Total	BG, CH, CZ, EL, HU, IT, LT, LV, MK, NO, PL, RO, RS, SK, TR	BG, CZ, HU, IT, MK, PL, RO	BG, CY, EL, HU, IT, LT, MK, PL, RO, RS, SI, SK, TR
	Category	BG, CZ, EL, HU, IT, LT, LV, MK, NO, PL, RO, RS, TR	BG, CZ, IT, MK, PL, RO	BG, EL, IT, MK, PL, RO, RS, SI, TR
	Service	BG, EL, HU, IT, LT, LV, MK, PL, RO, RS, TR	BG, IT, MK, PL, RO	BG, IT, MK, PL, RO, RS, TR
Does not collect		AT ⁴⁰ , BE, DE, IE ⁴¹ , NL		

⁴⁰ In Austria, the USP is just obliged to provide data on the total number of complaints received, without further specifications.

⁴¹ The NRA does not hold data for complaints to the USP, but uses the information on complaints published by the USP in its annual report.

9.2. Complaints received by USPs about universal service per country per 1,000 inhabitants, 2019-2021

	2019			2020			2021		
	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.
BG	16,143	6,951,482	2.32	2,424	6,951,482	0.35	3,466	6,916,548	0.50
CY	303	875,899	0.35	376	888,005	0.42	563	896,007	0.63
CZ	132,433	10,649,800	12.44	138,327	10,693,939	12.94	129,022	10,701,777	12.06
DK	19,245	5,806,081	3.31	37,363	5,822,763	6.42	38,055	5,840,045	6.52
EL	10,104	10,724,599	0.94	11,918	10,718,565	1.11	13,218	5,006,324	2.64
ES	224,168	46,937,060	4.78	249,842	47,332,614	5.28	-	47,398,695	-
FR	1,279,347	67,012,883	19.09	1,249,385	67,320,216	18.56	1,403,988	57,565,682	24.35
HU	27,350	9,772,756	2.80	34,798	9,769,526	3.56	46,786	9,730,772	4.81
HR	7,906	4,076,246	1.94	31,242	4,058,165	7.70	36,959	4,036,355	9.16
IE⁴²	31,357	4,904,240	6.39	48,076	4,964,440	9.68	-	5,006,324	-
IT	72,919	60,359,546	1.21	64,387	59,641,488	1.08	66,972	59,236,213	1.13
LT	3,311	2,794,184	1.18	3,614	2,794,090	1.29	6,197	1,893,223	0.63
LU	6,821	613,894	11.11	6,906	626,108	11.03	-	634,730	-
LV	743	1,919,968	0.39	922	1,907,675	0.48	1,185	1,893,223	0.63
MK	1,334	2,077,132	0.64	993	2,076,255	0.48	1,006	2,068,808	0.49
MT	886	493,559	1.80	858	514,564	1.67	621	516,100	1.20
NO	42,820	5,328,212	8.04	39,948	5,367,580	7.44	52,059	5,391,369	9.66
PL	189,658	37,972,812	4.99	181,724	37,958,138	4.79	161,218	37,840,001	4.26
PT	89,533	10,276,617	8.71	93,382	10,295,909	9.07	94,819	10,298,252	9.21
RO	21,000	19,414,458	1.08	24,000	19,328,838	1.24	24,000	19,201,662	1.25
RS	54,681	6,963,764	7.85	55,588	6,926,705	8.03	54,006	6,871,547	7.86
SE	74,285	10,230,185	7.26	80,538	10,327,589	7.80	88,297	10,379,295	8.51
SI	6,237	2,080,908	3.00	10,291	2,095,861	4.91	5,270	2,108,977	2.50
SK	52,627	5,450,421	9.66	56,547	5,457,873	10.36	72,544	5,459,781	13.29
TR	846	82,003,882	0.01	2,655	83,154,997	0.03	1,226	83,614,362	0.01

⁴² The NRA does not hold data for complaints to the USP, but uses the information on complaints published by the USP in its annual report.

9.3. Complaints received by NRAs about postal services per country per 10,000 inhabitants, 2019-2021

	2019			2020			2021		
	NRA complaints	Population	Per 10,000 inhab.	NRA complaints	Population	Per 10,000 inhab.	NRA complaints	Population	Per 10,000 inhab.
AT	518	8,858,775	0.58	612	8,901,064	0.69	634	8,932,664	0.71
BG	526	6,951,482	0.76	468	6,951,482	0.67	456	6,916,548	0.66
CY	9	875,899	0.10	17	888,005	0.19	24	896,007	0.27
CZ	449	10,649,800	0.42	388	10,693,939	0.36	454	10,701,777	0.42
DE	18,209	83819213	2.17	18,867	83166711	2.27	15,118	83,155,031	1.82
DK	82	5,806,081	0.14	182	5,822,763	0.31	-	5,840,045	-
EL	395	10,724,599	0.37	3,375	10,718,565	3.15	2,215	5,006,324	4.42
FR	7	67,012,883	0.00	3	67,320,216	0.00	5	57,656,682	0.00
HU	242	9,772,756	0.25	246	9,769,526	0.25	272	9,730,772	0.28
HR	340	4,076,246	0.83	443	4,058,165	1.09	318	4,036,355	0.79
IT	112	60,359,546	0.02	412	59,641,488	0.07	733	59,236,213	0.12
LT	73	2,794,184	0.26	124	2,794,090	0.44	268	2,795,680	0.96
LU	38	613,894	0.62	22	626,108	0.35	-	634,730	-
LV	12	1,919,968	0.06	33	1,907,675	0.17	20	1,893,223	0.11
MK	31	2,077,132	0.15	35	2,076,255	0.17	49	2,068,808	0.24
MT	41	493,559	0.83	57	514,564	1.11	42	516,100	0.81
PT	727	10,276,617	0.71	847	10,295,909	0.82	886	10,298,252	0.86
RO	350	19,414,458	0.18	523	19,328,838	0.27	454	19,201,662	0.24
SE	1,614	10,230,185	1.58	1,264	10,327,589	1.22	1,344	10,379,295	1.29
SI	26	2,080,908	0.12	23	2,095,861	0.11	42	2,108,977	0.20
SK	26	5,450,421	0.05	57	5,457,873	0.10	84	5,459,781	0.15
TR	6,428	82,003,882	0.78	26,353	83,154,997	3.17	12,979	83,614,362	1.55

9.4.Complaints received by USPs about cross-border services per country per 1,000 inhabitants, 2019-2021

	2019			2020			2021		
	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.	USP complaints	Population	Per 1,000 inhab.
BG	15,085	6,951,482	2.17	2,350	6,951,482	0.34	3,235	6,916,548	0.47
CZ	3,282	10,649,800	0.31	2,873	10,693,939	0.27	2,681	10,701,777	0.25
DK	4,908	5,806,081	0.85	5,295	5,822,763	0.91	12,813	5,840,045	2.19
HR	2,759	4,076,246	0.68	14,786	4,058,165	3.64	21,748	4,036,355	5.39
HU	12,383	9772756	1.27	5,409	9769526	0.55	16,494	9,730,772	1.70
IT ⁴³	22,970	60,359,546	0.38	27,895	59,641,488	0.47	24,665	59,236,213	0.42
LU	5,492	613,894	8.95	5,550	626,108	8.86	-	634,730	-
LV	99	1,919,968	0.05	180	1,907,675	0.09	181	1,893,223	0.10
MT	-	493,559	-	-	514,564	-	3	516,100	0.01
PT	40,218	10,276,617	3.91	37,976	10,295,909	3.69	41,005	10,298,252	3.98
RO	-	19,414,458	-	5,000	19,328,838	0.26	6,000	19,201,662	0.31
RS	4,251	6,963,764	0.61	11,370	6,926,705	1.64	5,051	6,871,547	0.74
SE	14,786	10,230,185	1.45	20,790	10,327,589	2.01	22,863	10,379,295	2.20
SK ⁴⁴	2,271	5,450,421	0.42	2,205	5,457,873	0.40	13,052	5,459,781	2.39

⁴³ The data refers to the complaints received about cross-border services by the USP related to priority mail, registered mail, insured mail and the parcel of the universal service

⁴⁴ The increase in the number of complaints is mainly due to a change in the statistical reporting (until 2020 there were only numbers of justified complaints) and the pandemic impact as well.

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COUNTRY CODES AND NRA ACRONYMS

Country	Acronym	NRA
Austria	AT	RTR
Belgium	BE	BIPT
Bulgaria	BG	CRC
Croatia	HR	HAKOM
Cyprus	CY	OCECPR
Czech Republic	CZ	CTU
Denmark	DK	FSTYR
Estonia	EE	ECA
Finland	FI	Traficom
France	FR	Arcep
Germany	DE	BNetzA
Greece	EL	EETT
Hungary	HU	NMHH
Ireland	IE	COMREG
Italy	IT	Agcom
Latvia	LV	SPRK
Lithuania	LT	RRT
Luxembourg	LU	ILR
Malta	MT	MCA
Montenegro	ME	EKIP
Netherlands	NL	ACM
Norway	NO	Nkom
Poland	PL	UKE
Portugal	PT	ANACOM
Romania	RO	ANCOM
Republic of North Macedonia	MK	AEC
Republic of Serbia	RS	RATEL
Slovakia	SK	RU
Slovenia	SI	AKOS
Spain	ES	CNMC
Sweden	SE	PTS
Switzerland	CH	PostCom
Turkey	TR	BTK

TERMS AND ABBREVIATIONS

CEN – Comité Européen de Normalisation / European Committee for Standardisation

C - Confidential

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