

Review of the literature and policy on the UK postal market – letters briefing



For Consumer Scotland

Final briefing paper |21st August 2023



Introduction

- Consumer Scotland commissioned EKOS Ltd to undertake a literature and policy review
 of the UK postal market, with the research undertaken between March 2023 and August
 2023. A workshop with stakeholders across the UK postal sector was held on 27th June
 2023 to discuss the findings of the research, their implications, and to examine ways
 forward.
- 2. This briefing paper on the letters market highlights the themes that emerged through the research, namely:
 - Balancing financial sustainability and meeting consumer needs
 - Regulation versus consumer outcomes
 - Consumers in vulnerable circumstances
- 3. The research findings, and the issues for further consideration, will be used by Consumer Scotland to inform its advocacy work in relation to the postal market, and for ongoing discussions with stakeholders.
- 4. This briefing paper sits alongside a main report and a briefing paper on the parcels market which have been published separately.

Balancing financial sustainability and meeting consumer needs

- 5. The Universal Service Obligation is a defining feature of the UK postal market. The financial sustainability of this has been at risk for the past decade or so and appears to be a long-standing concern. Indeed, Ofcom's first regulatory statement after taking over responsibility for regulating the postal sector in the UK concluded that the provision of the universal service is threatened by Royal Mail's immediate financial position [1].
- 6. This position has not vastly improved twelve years on.
- 7. There continues to be some inherent tensions in ensuring the financial sustainability of the Universal Service Obligation for the future while at the same time meeting the wants and needs of consumers. Indeed, Ofcom noted earlier in 2023 that "the uncertainties and risks around that sustainability have recently increased" [2] [page 24].



- 8. Royal Mail operates throughout the UK as the Universal Postal Service operator and is the UK's largest postal operator. The company is the only postal operator that provides UK wide end-to-end letter delivery services and is the UK's sole designated Universal Service Provider [3]. Royal Mail operates a near monopoly over "final mile" letter deliveries in the UK [4]. Indeed, Ofcom reports that letter users "rely almost exclusively on Royal Mail's universal service" [5] [page 22].
- 9. The Universal Postal Service is defined by the "one price goes anywhere" principle of affordable postal services to all UK addresses. This requires Royal Mail to deliver letters to every address in the UK, six days a week, at a uniform price, and parcels five days a week.
- 10. Ofcom, as regulator, has a role to play to support the financial sustainability and efficiency of the Universal Postal Service, and where appropriate to promote competition in the postal market. Where there is a conflict between the two duties, the provision of the Universal Postal Service takes precedence. Although legislation [6] and Ofcom sets out what must be provided under the Universal Postal Service, the regulatory framework allows for autonomy and commercial flexibility in how Royal Mail goes about achieving the objectives. This includes autonomy in price setting and flexibility on operational decisions. The regulatory framework sets out several safeguards that the Universal Postal Service provider is required to adhere to, including (but not limited to):
 - A safeguard cap on Second Class letters and parcels up to 2kg to ensure basic universal access to postal services
 - Quality of service standards on certain universal service products [7]
- 11. Royal Mail approached the UK Government to move to a minimum five-day delivery service for letters (instead of the current six-day delivery service) [8]. The main justification put forward by Royal Mail in support of its proposition can be summarised as follows:
 - The way consumers use postal services has changed over the last decade. There has been a structural decline in the letters market. UK total addressed letter volume was 20 billion in 2005 and declined to around 7.5 billion in 2020 [9]. In addition, letter delivery volume has declined 25% since the pandemic [10]
 - There has been continuous growth in the parcels market over the last decade.
 Online shopping was fast becoming a preferred way to shop for consumers, and the trend was accelerated during the pandemic. Internet sales as a percentage of retail sales in Great Britain was 10.3% in March 2013, 22.1% in March 2020 and 34.4% in March 2021. It declined slightly in March 2023 but remains high in historical terms at 25.5% [11]



- Royal Mail's business recovery, transformation and growth programme sets out plans to modernise and transform the business (including its infrastructure and working practices) which they suggest is to better meet changing consumer needs and to shift the balance of focus towards the growing parcels market. Indeed, the parcels market experienced significant growth in 2020-2021 4.2 billion parcels were sent in the UK (up 48% on the previous year) [12], and Royal Mail's Annual Accounts also confirm these trends in the letters and parcels market (in terms of both volume and revenue) [13]
- Royal Mail consider it important that the company is able to use the autonomy
 and commercial flexibility afforded to it through the regulatory framework, for
 example, to increase prices (for example, the prices of stamps [14] and
 redirections [15]). Royal Mail report that its price increases are largely due to
 changes in the market, increased costs associated with delivering letters six days
 a week to an increasing number of addresses in the UK, and to ensure the
 Universal Service Obligation remains sustainable longer-term
- Royal Mail's most recent financial results show the company made a loss of £1 billion in financial year 2022-2023 compared to a £250 million profit the previous year [16]
- 12. Ofcom's UK-wide Review of postal users' needs (2020) [17] used to inform its most recent Review of Postal Regulation [18] found that reducing the letter service to five days a week (Monday to Friday) but leaving everything else unchanged would meet the needs of 97% of residential and SME users alike. At face value, this suggests that the Royal Mail proposition would have no impact on consumers, although future research may be required. Ofcom say that reducing the letter delivery requirement to five days a week would therefore reasonably reflect the needs of users. It could also allow Royal Mail to make potential net cost savings of approximately £125-£225 million per year (2022-2023 terms) assuming it made modifications accordingly to its operational delivery model.
- 13. In its Review of Postal Regulation (2022), Ofcom concluded that the "overall scope of the Universal Service Obligation remains appropriate" [page 76] while noting that "the requirement for the delivery of letters to homes and businesses six days a week falls under the minimum requirements of the universal service set by Government and Parliament" [19] [page 77].
- 14. In a recent submission to the Scottish Parliament's Economy and Fair Work Committee, Consumer Scotland set out new research which found that more than half of consumers (53%) in Scotland regard six-day deliveries as important, with a fifth (20%) regarding these as very important. Those aged 35+ (55%) are most likely to regard delivery six days a week as important to them, when compared to 16 34 year olds (47%). Participants who placed importance on six day a week delivery services by Royal Mail were asked why they felt it was important. They commonly expressed the view that a six day



- delivery helped ensure that urgent, time-sensitive letters arrived on time and gave them peace of mind. [20]
- 15. The current position of the UK Government is that it does not have plans to change the statutory minimum requirements as set out in the Postal Services Act 2011 [21].
- 16. Such changes have taken place elsewhere in Europe (that is, a reduction in the number of days a week that letters are delivered). Financial and environmental sustainability considerations appear to have been the main drivers. In a European context, UK (and Germany) are now considered "outliers" as Europe's postal services continue to evolve [22].
- 17. The latest research from Ofcom (2022 data) on use of post and attitudes to postal services among residential consumers and SMEs shows that a vast majority of consumers and SMEs in the UK are fairly or very satisfied with the Royal Mail albeit satisfaction levels vary when aspects of the service are further examined [23].
- 18. More recent UK-wide research published by Ofcom's Communications Consumer Panel and Advisory Committee for Older and Disabled People (July 2023) [24] also highlights the positivity in which consumers and micro-businesses in remote and rural areas hold Royal Mail as well as their ongoing reliance on the Universal Service Obligation.
- 19. These sources and other consumer research undertaken by statutory advocacy bodies for postal consumers, however, highlight the following consumer issues: [25, 26, 27, 28, 29]
 - Royal Mail has regularly fallen short of its quality of service targets pre-2020, during the pandemic, and in the most recent financial year – time will tell whether quality of service levels recover. It is important to bear in mind that several factors are likely to impact on Royal Mail's performance (for example, logistical considerations, weather conditions, staff absence, industrial action), including mitigating factors (for example, the pandemic)
 - The House of Commons BEIS Select Committee is concerned that Royal Mail operates a policy of prioritising parcels over letters and may be failing to meet some of its statutory requirements
 - While the letters market has been in decline, letters help ensure access to a range of important services (for example, healthcare, financial, employment) and help people keep in touch with family and friends. Letters remain essential and relevant, and in particular for those groups who rely on them the most (for example, disabled people, people who do not use the internet)
 - There are factors at play that may affect the likelihood of e-substitution for certain customers or mail types. This includes: many users reveal a preference



for using physical post over electronic communications for those items they continue to send via post; a lack of e-literacy could be a barrier to some consumers or SMEs using electronic alternatives; and there remains a proportion of letters for which digital alternatives are not a good alternative (for example, Government and regulatory requirements for certain types of paper correspondence)



- Postal exclusion has a disproportionate impact on marginalised groups of people, including those in unsafe, precarious, and non-traditional living situations. Some services such as Poste Restante (created for those travelling within the UK, for example, on holiday or business) are potentially being used as half measures to help those transient communities but have restrictions on how long you can use the service in one town or city. The use of the service in this way does not address the need for properly developed solutions as highlighted by consumer advocacy organisations
- There are continuing concerns that some aspects of the Universal Service Obligation are becoming unaffordable (for example, among low income households), including postal redirections (and therefore consumers could miss important letters or face increased risk of identify fraud). Further, research shows that a significant minority of consumers cut back on essentials to be able to afford postage stamps. Ofcom's current view is that concerns around affordability is being driven by consumers broader financial challenges rather than by postal prices
- 20. Statutory advocacy bodies for postal consumers continue to call for Ofcom to ensure that Royal Mail secures a financially sustainable and efficient service. They state that achievement of this should not be at the expense of:
 - Affordable prices
 - A reduction in the quality of service
 - A reduction in coverage
 - The removal of Ofcom safeguards which help make postal services continue to be affordable
- 21. Advocacy bodies for postal consumers suggest that Royal Mail could place greater emphasis on infrastructure modernisation (which the company is doing) as a way to increase efficiency and make savings without impacting negatively on consumers. Continuing to protect access to, and ensuring the reliability and affordability of, postal services for all consumers is emphasised as vitally important by these consumer advocacy organisations.
- 22. Interestingly, the House of Commons BEIS Select Committee [30] has been particularly proactive in this regard, and following meetings with senior members of Royal Mail staff [31, 32, 33] has called for various reports by the end of 2023 and into 2024 to further explore its concerns in relation to:
 - Whether Royal Mail operates a policy of prioritising parcels over letters



- Whether it is failing to meet some of its statutory requirements under the Universal Service Obligation
- The tracking of Royal Mail staff to monitor productivity
- 23. There are further changes ahead for Royal Mail's senior leadership team a new Chief Executive will take up post in October 2023 the third Chief Executive in five years [34].

Regulation versus consumer outcomes

- 24. Some regulatory issues were touched on in the above section and are further explored below.
- 25. In relation to UK postal services, Ofcom focuses much of its regulatory activity on Royal Mail as the Universal Service Provider part of its responsibility is to monitor the performance of Royal Mail in line with current legislation and must carry out its regulatory activity in a way that secures the Universal Postal Service. Ofcom has an ongoing duty to keep the functions it carries out under review. Since taking up the role of regulator of UK postal services in 2011 Ofcom has undertaken three such regulatory reviews.
- 26. The most recent Review of Postal Regulation (2022) aimed to: improve protection for consumers; support the financial sustainability and efficiency of the Universal Postal Service; and promote competition in the postal market [35].
- 27. Ofcom concluded that the current regulatory framework is working well and meeting the needs of consumers: "Consequently, we have decided that a root-and-branch review of the framework is not necessary, and so will continue the current approach. Our decisions made in this review to modify the framework seek to strengthen the existing framework, targeting additional regulatory intervention only where we have direct concerns over consumer harm and to allow us to discharge our duties more effectively in relation to the financial sustainability of the Universal Postal Service" [36] [page 3].

28. Of com concluded that it would:

- Maintain the current overarching regulatory framework, including the price caps on basic universal services and quality of service standards
- Introduce new targeted consumer protections, requiring parcel operators to have policies and procedures for the fair and appropriate treatment of disabled consumers, and issue new guidance on complaints handling



- Continue to ensure that Royal Mail has commercial flexibility so that it can meet the challenges of ensuring a financially sustainable universal service
- Ensure there is a greater understanding of the financial sustainability of the universal service, to ensure Ofcom has the ability to identify and respond to sustainability concerns effectively
- Require Royal Mail to provide and publish a five-year view of its efficiency expectations and report against actual performance
- Provide a stable regulatory framework, to support investment by all postal operators and ensure Royal Mail competes on a level playing field
- 29. Maintaining the price caps on basic universal services and quality of service standards was welcomed by statutory advocacy bodies for postal consumers. The changes, such as the provision of additional guidance for complaints handling and action to allow disabled people to specify their parcel delivery needs, were also considered a positive step. Indeed, these issues continue to emerge within the existing research as having the potential for consumer harm.
- 30. The changes being implemented will, however, take time to bed in. Time will tell what impact they have for consumers, or whether Ofcom may require to take enforcement action or further tighten regulation. The Annual Monitoring Update Reports published by Ofcom and future consumer research will be important sources of intelligence to keep a watching brief on these consumer issues.
- 31. In relation to safeguard caps, Ofcom periodically reviews whether stamp prices should be capped to make sure the universal service remains affordable (and Royal Mail can recover its costs). The outcome of the current Ofcom consultation Review of Second Class safeguard caps 2024 will be important in this regard and will be known by the end of 2023 [37]. While Ofcom proposes that some safeguards be retained, some changes to current arrangements are proposed. The Ofcom proposals include to:
 - Retain a safeguard cap on Second Class standard and large letters
 - Remove the safeguard cap from parcels
 - Allow the safeguard caps on letters to rise with inflation (CPI), but no higher
 - Create a single basket cap for Second Class standard and large letters
 - Continue to limit the safeguard caps to Second Class letter services



- 32. The rationale for the Ofcom proposals relating to mail is that, as Royal Mail continues to be the only national scale provider of end-to-end delivery of letters in the UK, Ofcom cannot rely on competition to ensure prices remain affordable. As such it is proposed to retain a safeguard cap on second class letters. Interestingly, Ofcom note that its research now shows that concerns about affordability are driven by broader financial challenges that many consumers are experiencing (that is, the cost of living crisis) rather than by postal prices specifically.
- 33. An overarching regulatory principle of Ofcom is that it will "operate with a bias against intervention, but with a willingness to intervene firmly, promptly and effectively where required" [38] [page 3].
- 34. Statutory advocacy bodies for postal consumers are of the view that Ofcom has at times been slow to step in they consider proactive regulation and enforcement important to tackle the root causes of consumer issues in the postal market and to ensure these issues do not become engrained.
- 35. The body of existing and recent research and data identifies a range of issues that persist across the UK postal market. The scale of these issues has the potential for considerable consumer harm which requires to be mitigated in some way.
- 36. While, as noted above, research shows that vast majority of consumers and SMEs in the UK are fairly or very satisfied with the Royal Mail, consumers continue to raise concerns about the quality of service they receive from Royal Mail through the Universal Service Obligation. Based on a review of the existing research and data, some points to note include that [39, 40, 41, 42, 43, 44, 45, 46, 47]:
 - As noted above, Royal Mail has regularly fallen short of its performance targets
 - The proportion of consumer complaints received by Royal Mail increased by 21% between 2012-2013 and 2020-2021 – albeit this includes the COVID-19 period. The number of annual complaints have typically been in the 700s
 - Letter delays continue to be an issue, increased during the pandemic, and continued to rise in 2022 Citizens Advice estimate 31 million people (60% of UK adults) were hit by letter delays over the Christmas period, and that letter delays over the festive period is becoming a trend. Issues around the reliability of postal services include that people have lost legal paperwork, not received prescriptions or medication, or waited longer than expected for energy prepayment meter keys



- Statutory advocacy bodies for postal consumers continue to raise concerns with Royal Mail and Ofcom about the detrimental impacts of extended postal delays on all consumers, and in particular consumers in vulnerable circumstances.
 While consumers are indeed sending less letters nowadays, delays in receiving post may result in important correspondence and documentation being missed
- Statutory advocacy bodies for postal consumers continue to raise concerns that many consumers find it difficult to afford postal services and that some aspects of the Universal Service Obligation are increasingly becoming unaffordable
- 37. Ofcom has the authority to open cases and investigations and impose financial penalties on the Universal Postal Service provider if quality of service performance targets are not met, or if there are breaches of the legal duties bestowed on the provider. A few examples include:
 - Cases and/or then investigations opened by Ofcom into Royal Mail's performance against targets but with no financial penalty imposed - for example, in 2017-2018, 2020-2021, and 2021-2022 [48, 49, 50]
 - Royal Mail was retrospectively fined £50 million in August 2018, for "abusing its position" by discriminating against Whistl [51]
 - Royal Mail was fined £1.5 million in 2020 for missing its delivery targets for 2018-2019 and an additional fine of £100,000 for overcharging on stamps [52, 53]
 - A current Ofcom investigation is looking to resolve a dispute concerning whether Royal Mail responded to a new access service request by Whistl with terms, conditions and charges that were fair and reasonable [54]
- 38. The outcome of a current Ofcom investigation into Royal Mail's quality of service performance in 2022-2023 is as yet not known [55]. Ofcom has previously warned Royal Mail that it cannot rely on the impact of COVID-19 as an excuse for poor delivery performance, and that the regulator would be unlikely to consider these factors as exceptional and beyond Royal Mail's control in future. [56]
- 39. Statutory advocacy bodies for postal consumers continue to call for Ofcom to hold Royal Mail more strongly to account consumers are said to be paying more (for example, stamps and redirections) but are said to be receiving a subpar service from Royal Mail.



- 40. These organisations typically suggest that Ofcom's regulatory approach is to a certain extent hands-off and reactive, including when compared to its work in other sectors for which it has regulatory responsibility [57, 58, 59]. They also continue to call for Ofcom to be quicker to react, more proactive and agile in its regulatory approach, and to have stronger oversight of the postal market, given factors such as:
 - The importance of postal services and the range of issues facing the market
 - Wider external factors such as the evolving postal market, continuing and emerging trends post COVID-19, Brexit, and the cost of living crisis
- 41. A view provided by statutory advocacy bodies for postal consumers is that there is scope for improvement in the regulation of postal services, and that Ofcom could achieve this by, for example:
 - Introducing a minimum quality of service standard to hold Royal Mail to account over its performance during the festive period (Royal Mail is exempt from meeting delivery targets during the Christmas period), and for Scotland's Island communities (it is reported that these communities routinely receive a lower quality of service than mainland UK addresses)
 - Placing more importance on securing positive outcomes for consumers, including consumers in vulnerable circumstances (rather than a focus on market dynamics)
 - Ensuring that postal services are universal, affordable, consistent and fair for all
 - Using its powers to provide a safety net for consumers while at the same time promoting competition in the market
 - Defining the term "affordable" for postal service users
 - Addressing issues around the affordability of universal postal services as part of its review of safeguard caps for Royal Mail to be undertaken during 2023-2024, and which will apply from April 2024 (the outcome of this will be known by the end of 2023)
 - Re-assessing whether redirections are truly affordable and protecting it in regulation



Consumers in vulnerable circumstances

- 42. Like its counterparts elsewhere in the UK Consumer Scotland has a focus on advocating and representing consumers (including small businesses) in relation to a range of consumer issues, including postal services as well as having due regard to those consumers in vulnerable circumstances.
- 43. In addition to ensuring that postal services are affordable for all consumers, much of the literature emphasises the importance of ensuring that postal services are accessible to all regardless of where people live, their income level, personal characteristics or circumstances, or living situation.
- 44. More specifically, the literature suggests that more needs to be done to remove the specific structural barriers that exclude consumers in vulnerable circumstances from accessing post.
- 45. Despite the shift towards digital services and documentation, the research shows that consumers continue to need effective access to postal services. Consistent access to post is considered essential as people rely on postal services to send and receive a range of letters and documentation relating to benefits, employment, financial, health, housing, and legal matters, among other things. Consumers also access postal services to receive and send parcels.
- 46. Research published by statutory advocacy bodies for postal consumers continues to highlight challenges relating to the accessibility of postal services [60, 61, 62, 63, 64, 65]. Among other things, this research recognises that some people are unable to access post at home or may face barriers to doing so (known as post exclusion). Issues at play include:
 - The lack of a fixed address
 - Difficulties in using "care of" addresses (that is for people who may move around frequently)
 - The interception of mail



- 47. This research touches on the range of problems this can cause for consumers (and in some cases quantifies the scale and impact of the problem). Consumer detriment includes missing out on health care services, benefits, housing and employment opportunities, financial hardship, and debt.
- 48. Consumers who rely on post the most, and those consumers in vulnerable circumstances are said to be particularly negatively affected (including those groups who are in unsafe, precarious, and non-traditional living situations).
- 49. Taken together, the research highlights specific challenges and barriers for different groups of people, including:
 - Asylum seekers, new refugees and homeless people face issues due to having continuous changes of address
 - Those in the Gypsy/Traveller community experience issues with services being unable or unwilling to hold mail for collection for extended periods, or with site offices operating reduced hours
 - A lack of a fixed address prevents homeless people from communicating with a range of services (for example banks, health)
 - People experiencing domestic abuse or coercive control encounter a greater likelihood of mail being intercepted by perpetrators of domestic violence, and some have experience of an agency disclosing their new address to a perpetrator
 - Postal services are highly valued and frequently used by disabled people, and post offices are particularly important to disabled consumers
 - Other groups disproportionately affected include those who have: slept rough; lived in temporary accommodation; sofa surfed; lived in overcrowded accommodation; lived on a boat; lived in a caravan park; and those in safe, secure living situations
 - People who experience problems receiving their post are also more likely to be on a lower income, disabled, younger, from a Black, Asian or Minority Ethnic background and renting
- 50. Further, statutory advocacy bodies for postal consumers continue to highlight the need for greater use of alternative addresses and pick up points, including calls for government investment in an 'Address & Collect' (or a similar) service to ensure people in unsafe, precarious, or non-traditional living situations have equal access to post [66, 67, 68]. They suggest that this type of service must: enable people who do not have access to their post to collect it; be provided at a Post Office; be free and accessible for the user; and provide a safe and usable address.



51. Statutory advocacy bodies for postal consumers also call for Ofcom to develop a consumer vulnerability strategy for postal services to allow for better monitoring and to support quicker interventions to address issues that affect consumers in vulnerable circumstances.

Issues for further consideration

- 52. Our suggestions for Consumer Scotland and stakeholders to consider further are presented below. These are based on a review and assessment of all the evidence reviewed and insights from our consultation and engagement with stakeholders as part of this research.
- 53. It is over a decade since the introduction of the Postal Services Act (2011) which established the regulatory framework for the sector. While Ofcom undertakes periodic reviews of the regulatory framework, the financial sustainability of the Universal Service Obligation remains at risk. There may be a need to consider and review the current legislation and to consult on possible updates to ensure it remains relevant and fit-for-purpose. As postal services are not a devolved matter, any decision regarding whether this is progressed (or otherwise) rests with UK Government and Parliament.
- 54. More granular research may be required on how consumers in vulnerable circumstances are affected by the various postal related issues touched on in this review. As vulnerability is not a fixed state rather it is more fluid, and some consumers are likely to move in and out of vulnerable circumstances it will be important to continue to build on the existing evidence base to better understand the changing needs and preferences of consumers in vulnerable circumstances and intersectional vulnerability.
- 55. More concerted action is required to build a workable and joined-up solution to address the issue of postal exclusion across the UK. Such an approach recognises that people are transient and move not just within a country (for example, Scotland) but also across the UK. This may mean legislation at a UK level is required to protect people who are in vulnerable circumstances. In taking this work forward it will be important to consider that groups of marginalised people affected by postal exclusion may require different or tailored solutions (that is, a one-size-fits-all approach may not be appropriate). There are also lessons that could be learned from practice undertaken elsewhere (for example, the early success of An Post's Address Point in Ireland). As postal services are not a devolved matter, any decision regarding whether this is progressed (or otherwise) rests with UK Government and Parliament. There is, however, scope for a broad range of stakeholders, including Consumer Scotland, to work collaboratively to identify what action may be needed.



Appendix A: Endnotes

¹ Ofcom, Securing the Universal Postal Service, 20 October 2011

² Ofcom, Ofcom's Plan of Work 2023–24, 28th March 2023

³ Under the Postal Services Act 2011, Ofcom is the regulator for postal services in the UK. Ofcom's primary regulatory duty for postal services is to secure the provision of the Universal Postal Service. Ofcom has designated Royal Mail as the Universal Service Provider

⁴ UK Parliament, House of Commons Library, <u>Postal Services Research Briefing</u>, 11th May 2022

⁵ Ofcom, Review of postal regulation: Call for inputs, 11 March 2021

⁶ Ofcom, <u>UK legislation relating to the postal industry</u>

⁷ Ofcom, <u>2022 Review of Postal Regulation</u>, 18th July 2022

⁸ UK Parliament, House of Commons Library report - <u>Royal Mail and the future of the universal service obligation</u>, 9th January 2023

⁹ UK Parliament, House of Commons Library, <u>Postal Services Research Briefing</u>, 11th May 2022

¹⁰ UK Parliament, House of Commons Library, <u>Royal Mail services and the Covid-19</u> <u>pandemic</u>, 13th April 2022

¹¹ Office of National Statistics, <u>Retail Sales Index Time Series (DRSI)</u>, Release date 21st April 2023

¹² UK Parliament, House of Commons Library, Postal Services, 11th May 2022

¹³ UK Parliament, House of Commons Library, <u>Royal Mail services and the COVID-19</u> pandemic, 13th April 2022

¹⁴ Ofcom, Review of postal regulation Call for inputs, 11th March 2021

¹⁵ Citizens Advice - Left behind - The need for affordable mail redirections, June 2022

¹⁶ International Distributions Services, <u>Unaudited Preliminary Results For The 52 Week</u> Period Ended 26 March 2023, 18th May 2023

¹⁷ Ofcom, Review of postal users' needs, 26th November 2020

¹⁸ Ofcom, Review of Postal Regulation, 18th July 2022

¹⁹ Ofcom, Review of Postal Regulation, 18th July 2022

²⁰ Scottish Parliament, <u>Postal Services: Universal Service Obligation - Question for Department for Business, Energy and Industrial Strategy</u>, UIN 102844, tabled on 5th December 2022

²¹ UK Parliament, Royal Mail service changes Call for evidence, 8th June 2023

²² Share Talk, <u>France will deliver letters only three days, while Royal Mail appeals for an end to six-day delivery,</u> 26th December 2022

²³ Ofcom, Residential and SME Postal Trackers, 1st March 2023



- ²⁴ Communications Consumer Panel, <u>The struggle for fairness: the experience of consumers, citizens and micro-businesses in remote and rural locations in the UK</u>, July 2023
- ²⁵ Citizens Advice's UK-wide Millions without mail (2020)
- ²⁶ UK Parliament, the House of Commons BEIS Select Committee, <u>Royal Mail and the Post</u>
 <u>Office Non-inquiry session</u>
- ²⁷ Citizens Advice Scotland, <u>Today's Postal Market</u>, April 202
- ²⁸ The Consumer Council for Northern Ireland, <u>Consumer Access to Postal Services At the Post Office Opportunities and Challenges</u>, October 2022
- ²⁹ Citizens Advice Post the state of the sector, 9 March 2023
- ³⁰ UK Parliament, the House of Commons BEIS Select Committee, <u>Royal Mail and the Post</u> Office Non-inquiry session
- ³¹ Royal Mail and the Universal Service Obligation Hansard UK Parliament, 12th January 2023
- ³² Business, Energy and Industrial Strategy Committee Oral evidence: <u>Royal Mail and the Post</u> <u>Office</u>, HC 1045 Tuesday 17th January 2023
- ³³ UK Parliament, Royal Mail and the Post Office Non-inquiry session, 17th March 2023
- ³⁴ BBC, Royal Mail boss Simon Thompson to step down, 12th May 2023
- ³⁵ Ofcom, 2022 Review of Postal Regulation Statement, 18th July 2022
- ³⁶ Ofcom, 2022 Review of Postal Regulation Statement, 18th July 2022
- ³⁷ Ofcom, <u>Review of Second Class safeguard caps 2024</u>, <u>Proposed price caps for Second Class universal services</u>, 26th June 2023
- ³⁸ Ofcom, <u>Regulatory Enforcement Guidelines for investigations Guidelines</u>, 12th December 2022
- ³⁹ Ofcom, Annual Monitoring Update on Postal Services
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- ⁵¹ Ofcom, <u>Supreme Court rejects Royal Mail appeal against Ofcom fine for competition law breach</u>, 2022
- ⁵² Ofcom, <u>Decision finding Royal Mail contravened its quality of service performance targets in 2018-2019 and imposing a financial penalty under paragraph 6 of Schedule 7 to the Postal Services Act 2011, 10th July 2020</u>
- ⁵³ Ofcom, <u>Decision finding Royal Mail contravened the safeguard price control cap on Second Class letters and imposing a financial penalty under paragraph 6 of Schedule 7 to the Postal Services Act 2011, 21st August 2020</u>
- ⁵⁴ Ofcom, <u>Dispute between Whistl and Royal Mail concerning terms offered in response to a new access service request</u>, 8th March 2023
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- ⁶¹ Citizens Advice, <u>The postal paradox: how having no address keeps people homeless</u>, December 2018
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- ⁶³ Citizens Advice Scotland, <u>Staying in touch? Exploring Post Office, broadband, and mobile</u> phone accessibility for older and disabled consumers in Scotland, June 2020
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