

Mr. Stephen Brogan
Senior Manager, Postal Regulatory Policy
ComReg
Abbey Court
Irish Life Centre
Lower Abbey Street
Dublin 1

29 January 2013

Re: Adjusted An Post Price Application

Dear Mr Brogan

I refer to ComReg's consultation in relation to An Post's Price Application¹.

An Post believes that the prices proposed in the Price Application of 3 February 2012 are justified in the context of ensuring a sustainable Universal Service.

However, further to ComReg's preliminary assessment as set out in the Consultation document and in order to expedite the required increases, An Post is submitting an adjusted Price Application which is attached at Appendix 1. The adjusted Price Application reflects the tariffs which ComReg 'could be minded to consent to' as set out in the Consultation document. For completeness, all tariffs up to 50g are included again, including those for non universal services within the scope of the universal service.

ComReg has specifically requested views on the proposed tariff for the 'Deferred Delivery' service (Bulk Discount 6)². An Post has carefully considered the proposed tariff for this service in the context of Frontier's comments and the Tariff Principles set out in the Act and remains of the view that the proposed rate of 45c is appropriate. An Post strongly believes that this rate continues to represent real value for money to our business customers.

¹ ComReg document 12/138

² Paragraph 186 of the Consultation document

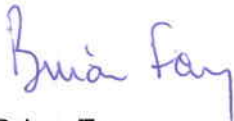
ComReg states in the Consultation document³ that any price that ComReg consents to for a Domestic Stamped Letter up to 50 grams must also apply to a Domestic Stamped Letter up to 100 grams. An Post confirms that it will adjust its 51-100 grams tariff accordingly.

The Consultation document⁴ also refers to the proposal to introduce a discount for stamps purchased online in a quantity of 300 or greater. ComReg states that this discount should 'be broadly the same as the discount for metered mail'. An Post had proposed a discount of 5% but now proposes that this is amended to 2%. This reflects both the cost savings and the minimum order quantity required.

An Post has responded separately to the issues raised in the Consultation.

If you require any further details, please do not hesitate to contact me.

Yours sincerely



Brian Fay
Head of Regulatory Affairs

³ Paragraph 95

⁴ Paragraph 121

Appendix 1 (a): Domestic Published Charges up to 50g - Increases in Charges Sought

Domestic Published Tariff Weight up to 50g	Current Tariff	Proposed Tariff	% Increase
Letters			
- Stamped	0.55	0.60	9.1%
- Metered	0.54	0.59	9.3%
- Business Reply	0.54	0.59	9.3%
Large Envelopes			
- Stamped	0.95	1.05	10.5%
- Metered	0.95	1.03	8.4%
- Business Reply	0.95	1.03	8.4%
Packets			
- Stamped	2.20	2.40	9.1%
- Metered	2.20	2.35	6.8%
- Business Reply	2.20	2.35	6.8%
Parcels	6.50	6.50	0.0%
Registered (Proof of Delivery Service)	5.25	5.50	4.8%
Registered parcel (Proof of Delivery Service)	10.50	10.50	0.0%

1. Each of the above services are specified as Universal Services by ComReg in

the Communications Regulation (Universal Postal Service) Regulations 2012

2. The above services are VAT exempt

3. Postal services for the blind - transmission without charge up to 7Kg

4. Poste Restante - Free

5. Handling Charge for Underpaid items 63c

6. Insurance, €5 plus the cost of the relevant standard service purchased

Appendix 1 (b): Domestic Discounts Published Charges up to 50g specified as Universal Services- Increases in Charges Sought Ceadunas Customers	0-50g Letter		0-50g Large Envelopes		0-50g Packet	
	Current	Proposed	Current	Proposed	Current	Proposed
Mail Presented at Main Mail Centres or Designated Acceptance Offices						
6. USO Deferred Bulk Mail Service (presentation before noon +85% autosort)	0.41	0.45	0.76	0.84	2.06	2.25
Mail Presented at Main Mail Centres or Designated Acceptance Offices						
9. PreSort (152 Sorts) before 5.30pm	0.44	0.48	0.82	0.90	2.00	2.19

1. The above discounts require 2,000 items for Ceadunas customers.
2. The above services are VAT exempt
3. For the USO Deferred Service (Discount 6), meter customers can avail of this service by presenting 200 items

Appendix 1 (c): Domestic Discounts Published Charges up to 50g within the scope of the Universal Service- Increases in Charges Sought Ceadunas Customers	0-50g Letter		0-50g Large Envelopes		0-50g Packet	
	Current	Proposed	Current	Proposed	Current	Proposed
Fully Paid Bulk Mail	0.54	0.60	0.95	1.05	2.20	2.40
Mail Presented at Main Mail Centres						
1. Presentation before noon auto processing	0.44	0.48	0.83	0.91		
2. Presentation before 3pm auto-processing	0.45	W/D	0.86	W/D		
3. Deferred processing before noon auto-processing	0.42	0.46	0.80	0.88		
4. Presentation before noon +85% autosort	0.43	0.47	0.80	0.88		
5. Presentation before 3pm +85% autosort	0.44	0.48	0.82	0.90		
7. Presentation before 3pm	0.46	0.50	0.87	0.96	2.04	2.23
8. Deferred Processing before noon	0.44	W/D	0.82	W/D	1.98	W/D
Mail Presented at Main Mail Centres or Designated Acceptance Offices						
10. PreSorted (152 Sorts) before noon	0.43	0.47	0.79	0.87	1.96	2.14
11. Deferred Processing before Noon	0.48	0.52	0.89	0.98	2.06	2.25
12. Deferred Processing before noon auto-processing	0.45	0.49	0.86	0.95		

W/D = Product Withdrawn

1. The above discounts require 2,000 items for Ceadunas customers. Meter customers can access Discount 11 and 12 with 200 items
2. The above rates are ex-VAT. An Post will keep customers informed of VAT developments.
3. An Post has notified ComReg (ComReg form 12/81m) that it provides the above postal services and having considered the guidelines set out by ComReg in document 12/81 are within the scope of the universal service

Appendix 1 (d): Domestic Bulk Access Published Charges up to 50g - Increases in Charges Sought - within the scope of the universal service Bearing Indicia acceptable to An Post (Consignment > 40Kg per format and weight)	0-50g Letter		0-50g Large Envelopes		0-50g Packet	
	Current	Proposed	Current	Proposed	Current	Proposed
	Mails Presented at Dublin Mail Centre or Air Mail Unit	0.44	0.48	0.82	0.90	2.04
5. Presentation before 3pm 85%+ auto-sort	0.46	0.50	0.87	0.96	1.96	2.14
7. Presentation before 3pm	0.43	0.47	0.79	0.87		
10. Pre Sorted (152 Sorts) before noon						

1. An Post has notified ComReg (ComReg form 12/81n) that it provides the above postal services and having considered the guidelines set out by ComReg in document 12/81 are within the scope of the universal service

Appendix 1 (e): International Outbound Published Tariffs Weight Up to 50g - Increases in Charges Sought

	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-50g	0.82	0.90	0.82	0.90	0.82	0.90

Large Envelopes	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-50g	1.50	1.65	1.50	1.65	1.50	1.65

Packets	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-50g	2.70	3.00	2.70	3.00	2.70	3.00

Parcels	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-50g	18.25	20.00	22.00	25.00	22.00	25.00

Sending Books Abroad	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-50g	9.00	15.00	9.00	15.00	14.00	17.00

Registered Fee (Proof of Delivery)	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
Letter (0-50g)	5.17	5.50	5.17	5.50	5.17	5.50
Flat (0-50g)	5.85	6.25	5.85	6.25	5.85	6.25
Packets (0-50g)	7.05	7.60	7.05	7.60	7.05	7.60
Parcel (0-50g)	23.00	25.00	27.00	30.00	27.00	30.00

1. The above services are VAT exempt
2. Each of the above services are specified as Universal Services by ComReg in the Communications Regulation (Universal Postal Service) Regulations 2012
3. Insurance, €5 plus the cost of the relevant standard service purchased (service subject to availability in destination country)

Appendix 1 (f): Standard International Bulk Mail Service Published Tariffs Weight Up to 50g - Increases in Charges Sought

Country	Priority Letters						Priority Flats						Priority Packets					
	25g			50g			50g			50g			50g			50g		
	Proposed	Current	% Inc.	Proposed	Current	% Inc.	Proposed	Current	% Inc.	Proposed	Current	% Inc.	Proposed	Current	% Inc.	Proposed	Current	% Inc.
UK	€0.52	€0.50	4%	€0.59	€0.57	4%	€0.60	€0.58	3%	€1.50	€1.50	0%	€1.50	€1.50	0%			
Austria	€0.68	€0.65	5%	€0.90	€0.82	10%	€1.17	€0.91	28%	€2.12	€1.29	63%	€2.12	€1.29	63%			
Belgium	€0.65	€0.64	2%	€0.75	€0.73	2%	€1.40	€1.40	0%	€1.88	€1.88	0%	€1.88	€1.88	0%			
Denmark	€0.90	€0.78	15%	€0.90	€0.82	10%	€1.30	€1.20	8%	€2.56	€2.56	0%	€2.56	€2.56	0%			
Finland	€0.75	€0.64	16%	€0.83	€0.72	16%	€0.90	€0.78	16%	€1.34	€1.34	15%	€1.54	€1.34	15%			
France	€0.70	€0.68	2%	€0.90	€0.82	10%	€0.99	€0.98	2%	€1.67	€1.64	2%	€1.67	€1.64	2%			
Germany	€0.68	€0.68	0%	€0.90	€0.82	10%	€1.43	€1.43	0%	€1.98	€1.97	0%	€1.98	€1.97	0%			
Greece	€0.71	€0.67	7%	€0.90	€0.82	10%	€1.14	€1.01	13%	€1.70	€1.58	7%	€1.70	€1.58	7%			
Iceland	€0.66	€0.57	16%	€0.82	€0.67	22%	€0.93	€0.71	30%	€1.50	€1.50	0%	€1.50	€1.50	0%			
Italy	€0.80	€0.80	0%	€0.90	€0.82	10%	€1.33	€1.33	0%	€2.70	€2.70	0%	€2.70	€2.70	0%			
Luxembourg	€0.65	€0.65	0%	€0.76	€0.76	0%	€1.25	€1.25	0%	€2.14	€2.14	0%	€2.14	€2.14	0%			
Netherlands	€0.62	€0.62	0%	€0.90	€0.82	10%	€0.92	€0.91	0%	€1.85	€1.85	0%	€1.85	€1.85	0%			
Norway	€0.90	€0.82	10%	€0.90	€0.82	10%	€1.34	€1.27	5%	€2.43	€2.29	6%	€2.43	€2.29	6%			
Portugal	€0.58	€0.58	0%	€0.77	€0.77	0%	€0.92	€0.92	0%	€1.28	€1.27	0%	€1.28	€1.27	0%			
Spain	€0.42	€0.41	2%	€0.57	€0.55	4%	€0.73	€0.61	20%	€1.44	€1.44	0%	€1.44	€1.44	0%			
Sweden	€0.70	€0.70	0%	€0.90	€0.82	10%	€0.96	€0.96	0%	€1.70	€1.70	0%	€1.70	€1.70	0%			
Switzerland	€0.76	€0.72	6%	€0.79	€0.75	6%	€1.51	€1.43	6%	€6.17	€6.17	0%	€6.17	€6.17	0%			
Czech Rep.	€0.49	€0.49	0%	€0.57	€0.57	0%	€0.68	€0.68	0%	€0.72	€0.72	0%	€0.72	€0.72	0%			
Hungary	€0.51	€0.45	12%	€0.66	€0.59	12%	€0.71	€0.64	11%	€0.88	€0.88	0%	€0.88	€0.88	0%			
Poland	€0.47	€0.45	5%	€0.52	€0.50	5%	€0.55	€0.53	5%	€0.76	€0.76	0%	€0.76	€0.76	0%			
Slovenia	€0.39	€0.37	7%	€0.48	€0.48	1%	€0.50	€0.49	2%	€0.70	€0.70	0%	€0.70	€0.70	0%			
Slovakia	€0.70	€0.70	0%	€0.75	€0.75	0%	€0.84	€0.84	0%	€0.84	€0.84	0%	€0.84	€0.84	0%			
Latvia	€0.62	€0.62	0%	€0.69	€0.69	0%	€0.71	€0.71	0%	€0.88	€0.88	0%	€0.88	€0.88	0%			
Lithuania	€0.47	€0.47	0%	€0.53	€0.53	0%	€0.56	€0.56	0%	€0.76	€0.76	0%	€0.76	€0.76	0%			
Estonia	€0.46	€0.38	20%	€0.51	€0.43	19%	€0.53	€0.45	20%	€0.94	€0.78	21%	€0.94	€0.78	21%			
Romania	€0.41	€0.41	0%	€0.49	€0.49	0%	€0.53	€0.53	0%	€0.79	€0.79	0%	€0.79	€0.79	0%			
U.S.A.	€0.41	€0.41	0%	€0.51	€0.51	0%	€0.53	€0.52	1%	€0.67	€0.67	0%	€0.67	€0.67	0%			
Canada	€0.61	€0.61	0%	€0.75	€0.75	0%	€0.76	€0.76	0%	€0.80	€0.80	0%	€0.80	€0.80	0%			
Australia	€0.62	€0.62	0%	€0.77	€0.77	0%	€0.79	€0.79	0%	€0.83	€0.83	0%	€0.83	€0.83	0%			
New Zealand	€0.66	€0.63	6%	€0.86	€0.78	10%	€0.87	€0.79	10%	€0.91	€0.88	3%	€0.91	€0.88	3%			
Israel	€0.58	€0.58	0%	€0.68	€0.69	0%	€0.70	€0.70	0%	€0.75	€0.75	0%	€0.75	€0.75	0%			
Japan	€0.59	€0.59	0%	€0.71	€0.72	0%	€0.73	€0.73	0%	€0.80	€0.80	0%	€0.80	€0.80	0%			
Russia	€0.60	€0.60	0%	€0.70	€0.70	0%	€0.49	€0.49	0%	€0.59	€0.59	0%	€0.59	€0.59	0%			
Turkey	€0.24	€0.24	0%	€0.42	€0.42	0%	€0.48	€0.48	0%	€0.58	€0.58	0%	€0.58	€0.58	0%			
South Africa	€0.25	€0.25	0%	€0.44	€0.44	0%	€0.50	€0.50	0%	€0.59	€0.59	0%	€0.59	€0.59	0%			
Malta	€0.28	€0.28	0%	€0.50	€0.50	0%	€0.58	€0.58	0%	€0.68	€0.68	0%	€0.68	€0.68	0%			
Cyprus	€0.27	€0.27	0%	€0.51	€0.51	0%	€0.60	€0.60	0%	€0.69	€0.69	0%	€0.69	€0.69	0%			
Bulgaria	€0.24	€0.24	0%	€0.45	€0.45	0%	€0.48	€0.48	0%	€0.58	€0.58	0%	€0.58	€0.58	0%			
Argentina	€0.27	€0.27	0%	€0.51	€0.51	0%	€0.60	€0.60	0%	€0.69	€0.69	0%	€0.69	€0.69	0%			
Brazil	€0.29	€0.29	0%	€0.54	€0.54	0%	€0.59	€0.59	0%	€0.69	€0.69	0%	€0.69	€0.69	0%			
India	€0.23	€0.23	0%	€0.42	€0.42	0%	€0.50	€0.50	0%	€0.59	€0.59	0%	€0.59	€0.59	0%			
Hong Kong	€0.23	€0.23	0%	€0.41	€0.41	0%	€0.48	€0.48	0%	€0.57	€0.57	0%	€0.57	€0.57	0%			
Mexico	€0.26	€0.26	0%	€0.47	€0.47	0%	€0.53	€0.53	0%	€0.63	€0.63	0%	€0.63	€0.63	0%			
Philippines	€0.24	€0.24	0%	€0.45	€0.45	0%	€0.49	€0.49	0%	€0.58	€0.58	0%	€0.58	€0.58	0%			
Singapore	€0.24	€0.24	0%	€0.42	€0.42	0%	€0.49	€0.49	0%	€0.58	€0.58	0%	€0.58	€0.58	0%			
China	€0.24	€0.24	0%	€0.43	€0.43	0%	€0.51	€0.51	0%	€0.60	€0.60	0%	€0.60	€0.60	0%			

1. Each of the above services are specified as Universal Services by ComReg in the Communications Regulation (Universal Postal Service) Regulations 2012

Appendix 1 (g): International BULK Mail Service Published Tariffs Weight Up to 50g - Increases in Charges Sought

Country	Letters Extra						Flats Extra		
	25g			50g			50g		
	Proposed	Current	% Inc.	Proposed	Current	% Inc.	Proposed	Current	% Inc.
UK	€0.48	€0.46	4%	€0.51	€0.49	4%	€0.53	€0.51	4%
Austria	€0.65	€0.58	12%	€0.90	€0.75	20%	€1.11	€0.82	36%
Belgium	€0.62	€0.57	8%	€0.71	€0.64	11%	€1.26	€1.26	0%
Denmark	€0.90	€0.70	28%	€0.90	€0.82	10%	€1.24	€1.08	15%
Finland	€0.71	€0.57	23%	€0.78	€0.64	22%	€0.86	€0.70	22%
France	€0.66	€0.61	8%	€0.90	€0.82	10%	€0.94	€0.87	8%
Germany	€0.63	€0.61	3%	€0.90	€0.82	10%	€1.32	€1.28	3%
Greece	€0.68	€0.60	13%	€0.90	€0.77	17%	€1.08	€0.90	20%
Iceland	€0.63	€0.51	23%	€0.78	€0.60	30%	€0.88	€0.64	38%
Italy	€0.76	€0.72	6%	€0.90	€0.82	10%	€1.26	€1.20	6%
Luxembourg	€0.60	€0.58	3%	€0.70	€0.68	3%	€1.16	€1.12	3%
Netherlands	€0.59	€0.56	6%	€0.90	€0.82	10%	€0.87	€0.82	6%
Norway	€0.90	€0.82	10%	€0.90	€0.82	10%	€1.28	€1.14	12%
Portugal	€0.55	€0.52	6%	€0.73	€0.69	6%	€0.87	€0.82	6%
Spain	€0.40	€0.37	8%	€0.54	€0.49	10%	€0.69	€0.54	27%
Sweden	€0.66	€0.63	4%	€0.90	€0.82	10%	€0.90	€0.86	5%
Switzerland	€0.72	€0.64	12%	€0.75	€0.67	12%	€1.44	€1.28	12%
Czech Rep.	€0.44	€0.44	0%	€0.51	€0.51	0%	€0.61	€0.61	0%
Hungary	€0.48	€0.41	19%	€0.62	€0.53	18%	€0.67	€0.57	18%
Poland	€0.45	€0.40	12%	€0.49	€0.44	10%	€0.53	€0.47	11%
Slovenia	€0.37	€0.33	13%	€0.46	€0.43	8%	€0.47	€0.44	8%
Slovakia	€0.66	€0.62	6%	€0.71	€0.67	6%	€0.80	€0.75	6%
Latvia	€0.56	€0.56	0%	€0.62	€0.62	0%	€0.64	€0.64	0%
Lithuania	€0.43	€0.43	0%	€0.49	€0.48	0%	€0.51	€0.50	2%
Estonia	€0.44	€0.34	28%	€0.48	€0.38	25%	€0.51	€0.40	27%
Romania	€0.39	€0.37	4%	€0.46	€0.44	4%	€0.49	€0.45	5%
U.S.A.	€0.39	€0.35	12%	€0.49	€0.44	12%	€0.50	€0.45	12%
Canada	€0.52	€0.52	0%	€0.64	€0.64	0%	€0.65	€0.65	0%
Australia	€0.53	€0.53	0%	€0.69	€0.66	4%	€0.70	€0.67	4%
New Zealand	€0.63	€0.54	17%	€0.81	€0.67	21%	€0.83	€0.68	22%
Israel	€0.55	€0.50	10%	€0.65	€0.59	10%	€0.66	€0.60	10%
Japan	€0.56	€0.51	10%	€0.68	€0.61	11%	€0.69	€0.63	10%
Russia	€0.51	€0.51	0%	€0.60	€0.60	0%	€0.42	€0.42	0%
Turkey	€0.21	€0.21	0%	€0.36	€0.36	0%	€0.41	€0.41	0%
South Africa	€0.21	€0.21	0%	€0.37	€0.37	0%	€0.42	€0.42	0%
Malta	€0.24	€0.24	0%	€0.43	€0.43	0%	€0.50	€0.50	0%
Cyprus	€0.23	€0.23	0%	€0.44	€0.44	1%	€0.51	€0.51	0%
Bulgaria	€0.21	€0.21	3%	€0.41	€0.38	8%	€0.43	€0.40	5%
Argentina	€0.23	€0.23	0%	€0.45	€0.44	3%	€0.51	€0.51	0%
Brazil	€0.25	€0.25	0%	€0.48	€0.46	0%	€0.50	€0.50	0%
India	€0.20	€0.20	0%	€0.38	€0.36	7%	€0.42	€0.42	0%
Hong Kong	€0.20	€0.20	0%	€0.37	€0.35	5%	€0.41	€0.41	0%
Mexico	€0.22	€0.22	0%	€0.41	€0.40	3%	€0.45	€0.45	0%
Philippines	€0.21	€0.21	0%	€0.40	€0.38	5%	€0.42	€0.42	0%
Singapore	€0.21	€0.21	0%	€0.36	€0.36	0%	€0.41	€0.41	0%
China	€0.21	€0.21	0%	€0.38	€0.37	3%	€0.43	€0.43	0%

1. An Post has notified ComReg (ComReg form 12/81n) that it provides the above postal services and having considered the guidelines set out by ComReg in document 12/81 are within the scope of the universal service

Appendix 1 (h): International BULK Mail Service Published Tariffs Weight Up to 50g - Increases in Charges Sought

Country	IBMS - DSA (to UK only)					
	50g Letter			50g Flat		
	Proposed	Current	% Inc.	Proposed	Current	% Inc.
UK	€0.387	€0.284	36%	€0.545	€0.414	32%

1. An Post has notified ComReg (ComReg form 12/81n) that it provides the above postal services and having considered the guidelines set out by ComReg in document 12/81 are within the scope of the universal service