

Call for InputsPostal Regulation Strategy

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Additional Information

ComReg Postal Strategy Statement 2020 - 2022	
Document No:	19/113
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How to respond

Responses must be submitted in written form (post or email) by Friday 20 August 2021 to the following recipient clearly marked "Submissions to ComReg 21/67":

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Please note in accordance with ComReg's Consultation Procedures in ComReg Document 11/34, ComReg will publish all respondents' submissions to this Call for Inputs, subject to the provisions of ComReg's guidelines on the treatment of confidential information in ComReg Document 05/24.

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1 Introduction

Background

- The extraordinary challenges caused by the Covid-19 pandemic have confirmed the importance of the postal sector. At the same time, it accelerated the trend of digitisation and the rapid growth in e-commerce on the postal sector as follows:
 - (1) Increasing digital communications is decreasing the demand for letters.
 - (2) Online shopping is increasing the demand for parcels, with the postal sector being essential in the delivery of goods as stores were closed.
- 2. These contrasting changes present different challenges:
 - The decline in the volume of letters has created challenges for the postal sector and continues to drive the need for efficient delivery of declining letters.
 - The growing e-commerce industry creates new opportunities and demands for increased parcel delivery requirements for the postal sector to respond to.
- 3. Furthermore, the boundaries between postal, delivery, transport, and platforms/digital services sector have become increasingly blurred; this also raises challenges for consideration.
- 4. There are also considerations for the postal sector in terms of environmental sustainability.
- 5. Given the above, it is an opportune time for ComReg to review its approach to postal regulation. By this Call for Inputs, ComReg is commencing its process to set ComReg's next Postal Strategy Statement.

Context for ComReg's Postal Strategy

- 6. The Commission for Communications Regulation ("ComReg") is the statutory body responsible for the regulation of the postal services in the Republic of Ireland¹. ComReg has a range of statutory functions and objectives in relation to the provision of postal services in accordance with the European Postal Services Directive², transposed by national legislation ("the Postal Act")³.
- 7. In line with section 31 of the Communications Regulation Act 2002 (No. 20 of 2002), as amended, ComReg is required to set its strategy for postal services regulation every two years⁴.
- 8. As noted above, the postal sector is being disrupted by digital transformation with fewer letters being sent due to digital communications and increased parcels being delivered due to increased online shopping. The postal sector is changing to meet these changes in postal users' needs. These changing users' needs also require consideration as to whether changed postal regulation is needed.
- 9. Given the above, ComReg plans to publish its draft Postal Strategy Statement for public consultation in October 2021 and, following consideration of responses to that public consultation, its Postal Strategy Statement by end December 2021.
- 10. ComReg's forthcoming strategy for postal services regulation will contain the following components:
 - A discussion of the strategic context, main trends and challenges that ComReg expect will shape the postal sector and our regulation.
 - A series of Goals, organised by Strategic Intentions, setting out how ComReg intends to fulfil its strategy.
- 11. In advance of that, by this Call for Inputs, ComReg is seeking to elicit views on the scope and matters to be addressed in the forthcoming postal strategy.⁵

¹ All financial and other non-postal services which are provided at "post offices" are outside the definition of "postal services" and therefore such services are outside the regulatory remit of ComReg.

² The objectives for postal services regulation have been implemented in EU law through the European Postal Services Directive - Directive 97/67/EC. This directive established a regulatory framework for European postal services and was amended by Directive 2002/39/EC and Directive 2008/6/EC.

³ Communications Regulation (Postal Services) Act 2011, as amended.

⁴ ComReg's last Postal Strategy Statement 2020 – 2022 can be found at https://www.comreg.ie/media/2019/12/ComReg-19113DESIGN.pdf and is summarised in Chapter 3.

⁵ This Call for Inputs is in addition to the public Consultation on the draft Strategy, due to take place in October 2021.

- 12. This Call for Inputs proceeds as follows:
 - Chapter 2 asks what should be ComReg's strategy for postal services regulation. Seven initial considerations are provided to inform this.
 - (1) Should we consider the blurring of sector boundaries and the interaction of different regulatory frameworks?
 - (2) Should we consider other developments that may be impacting the postal sector?
 - (3) What is the future of next day delivery letters and what could this mean for the universal postal service?
 - (4) What actions are required to respond to environmental sustainability challenges?
 - (5) How should International inbound universal postal service losses be addressed?
 - (6) What regulation is needed in the postal sector?
 - (7) How should ComReg's role evolve?
 - Chapter 3 summaries the last Postal Strategy 2020 2022.
 - Chapter 4 sets out the Call for Inputs questions, sets out the next steps and how to respond to this Call for Inputs.
 - Annex 1 provides some information on the universal postal service 2017-2019.
 - Annex 2 summarises ComReg's current legislative remit for postal regulation.

2 What should be the strategy for postal services regulation?

- 13. At this time, ComReg considers that the postal sector is in a period of significant change, with further significant change likely over the next two years. Significant change occurring now and over the next two years include:
 - (1) Users' needs are largely transitioning from letters (though acknowledging remaining letters are important to users including business users) to parcels (for e-commerce);
 - (2) The postal sector is changing to meet those changed users' needs;
 - (3) An assessment of the legislation underpinning postal regulation. The European Commission is in the process of evaluating and assessing whether the Postal Services Directive which sets a minimum scope for postal regulation is still fit for purpose and achieves its original aim of ensuring that everyone in the European Union receives minimum postal service at an affordable price⁶.
- 14. Given these dynamics at play, ComReg considers that it would be difficult to set a medium-term 5 year postal strategy, as was done for the last postal strategy. Therefore, ComReg proposes to limit the postal strategy to the period to 2022- 2024, consistent with the statutory requirement. However, in setting the postal strategy to 2024, ComReg will consider the strategic context (trends and challenges) beyond this two-year timeframe, where appropriate. A medium-term strategy will be considered for the 2024-2026 Postal Strategy Statement as there may be more clarity on the future postal sector and its regulation by 2024. By this Call for Inputs, ComReg seeks views on this.

 $^{^{6} \ \}underline{\text{https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11965-Postal-services-} \\ \underline{\text{evaluation-report_en}}$

Seven initial considerations for the forthcoming strategy

15. The forthcoming period has a number of considerations that ComReg is seeking views on. An initial seven considerations that ComReg would welcome input on are as follows:

(1) Should we consider the blurring of sector boundaries and the interaction of different regulatory frameworks?

The boundaries between postal, delivery, transport, and platforms/digital services sector have become increasingly blurred. This raises the challenge to redefine the boundaries of postal regulation and to focus only where postal sector-specific regulation is still needed to address any market failures in the postal sector.

The blurring of sector boundaries also leads to an increased interaction of different regulatory frameworks (for example the proposed Digital Markets Act (DMA)⁷ and Digital Services Act⁸ etc.), it is important to consider how these different regulations will interact with each other and to ensure that they leave neither gaps (adversely affecting consumers) nor create overlaps (unnecessarily burdening operators).

Should ComReg consider this blurring of market boundaries and, if so, how? Any consideration will likely be informed by an evidential approach. Given the rapidly changing sector, to facilitate obtaining evidence to support any approach, is there merit in clear empowerment of ComReg to monitor sector developments by necessary and enforceable data collection?

(2) Should we consider other developments that may be impacting the postal sector?

There is likely to be other developments impacting the postal sector that may need consideration by ComReg; for example, this may include technological change and other laws regarding taxation (e.g. VAT, Customs 2020), transport, consumer and employment that impact the postal sector. In this regard, what other developments are impacting the postal sector? Should these be considered by ComReg, and, if so, how?

⁷ The proposed DMA includes rules that govern gatekeeper online platforms. Gatekeeper platforms are digital platforms with a systemic role between businesses and consumers for important digital services.

⁸ The proposed rules specified in the DSA primarily concern online intermediaries and platforms. For example, online marketplaces.

(3) What is the future of next day delivery letters and what could this mean for the universal postal service?

The current universal postal service is largely the next day delivery of letters. With regard to letter post, An Post has signalled possible plans to introduce an additional deferred delivery service (for example, delivery within 2 days) for single piece letters⁹. If An Post implements such a postal service this would offer An Post's customers a deferred delivery single piece letter service; similar to An Post's existing deferred delivery service for its large postal customers using bulk mail. An Post's bulk mail deferred delivery service is priced lower than the next day delivery bulk mail price¹⁰.

This deferred delivery single piece letter service could be more popular with users with a resultant reduced use of the next day delivery letter service, which is currently required to be provided by the universal postal service.

ComReg must consider what regulatory approach would be appropriate if the majority of users were to choose a deferred delivery service for letters. This may have implications for the scope and designation of the universal postal service.

(4) What actions are required to respond to environmental sustainability challenges?

Postal service providers and parcel delivery service providers are taking actions to respond to the delivery challenges resulting from environmental sustainability actions. It is recognised that the postal sector must support and advance the objectives of the UN Sustainable Development Goals with regard to climate action (Goal 13)¹¹. Increased digitalisation is increasing e-commerce and the amount of goods transported globally. This increased e-commerce is increasing our carbon footprint, but postal and parcel delivery operators are already acting and seeking further ways to mitigate carbon emissions resulting from this trend. There may be further possible actions required for environmental sustainability, for example:

https://www.rte.ie/radio/radioplayer/html5/#/radio1/21901806; https://www.thesun.ie/news/6487751/an-post-first-second-class-pricing-system-mortgage-market/; https://www.irishtimes.com/business/retail-and-services/an-post-daily-delivery-may-end-in-next-couple-of-years-ceo-says-1.4235167

¹⁰ https://www.anpost.com/Commerce/Bulk-Mail/Bulk-Mail-Discounts/Domestic-Bulk-Mail

¹¹ https://www.un.org/sustainabledevelopment/sustainable-development-goals/

- there may be a societal benefit to enabling access to postal infrastructure (particularly "last mile") to promote sustainable delivery. Access to shared postal infrastructure could minimise duplication of delivery in the same area from half-empty vehicles, this may be particularly an issue in less populated areas.
- while fleet electrification in the last mile is well underway, the main challenge is greening long-distance transport which require more fuel efficiency to zero emissions trucks.
- circular economy considerations, including package waste arising from more e-commerce deliveries. The European Green Deal¹² provides an action plan to boost the efficient use of resources by moving to a clean, circular economy, with a national Waste Action Plan for a Circular Economy¹³.

ComReg notes the development of the Climate Action and Low Carbon Development Bill and will be required, in so far as practicable, to discharge its existing functions consistent with the requirements included in the final Act.

Given all of the above and other environmental sustainability considerations, how should ComReg facilitate the postal sector's response to environmental sustainability challenges?

(5) How should International inbound universal postal service losses be addressed?

International Inbound mail, that is mail posted overseas for delivery in Ireland, is the major loss-making component of the universal postal service and the losses on this mail have been significant each year¹⁴. Where terminal dues do not cover the cost of delivery in Ireland, there is a likely distortive effect on trade and e-commerce. In effect, overseas traders sending goods by mail into Ireland are paying lower rates to reach their Irish customers than traders in Ireland. ComReg's current role on international inbound mail is limited by legislation to a compliance role, requiring An Post, as the current universal postal service provider, to cover its costs in processing and delivering international inbound mail within the universal postal service from other EU Member States only. Therefore, ComReg's role does not include UPU rates (as these apply for rest of world, outside EU) and any bi-lateral rates agreed with the

¹² https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en

¹³ https://www.gov.ie/en/publication/4221c-waste-action-plan-for-a-circular-economy/

¹⁴ See Annex 2 for more information – the losses are mainly due to increased Rest of World (Asia) inbound packets.

Royal Mail, following Britain's exit from the European Union. What should be ComReg's role to address the ongoing international inbound universal postal service losses?

(6) What regulation is needed in the postal sector?

In the changing transition of postal, considerations also arise for users' needs for post and protection of these consumer needs, in particular the "digitally disadvantaged" and vulnerable users.

This is being considered by the European Commission by its initiative to assess the Postal Services Directive with the aim to ensure that everyone in the European Union receives minimum postal service at a reasonable price (the universal service obligation ("USO")). The Postal Services Directive informs what is the universal postal service and what is the postal service that sets the remit of postal regulation. Since the last Postal Services Directive revision in 2008, the postal sector has undergone major changes due to digitalisation and e-commerce. The current European Commission evaluation of the Postal Services Directive is assessing whether the Directive is still fit for purpose and achieves its original aims. In this regard, the European Commission commissioned WiK to study user needs for post and to provide recommendations for potential improvements to the Postal Services Directive and outcome of that study was published in March 2021¹⁵. Some of the potentials for improvement identified by WiK¹⁶ for the Postal Services Directive are:

- i. The definition of a "postal service" should be updated to take into account new business models. Postal service should exclude local delivery from shops and food delivery; a postal service includes at least one processing in a sorting centre.
- ii. The current Postal Services Directive enables Member States to determine the scope of services within the USO flexibly. This flexibility should be maintained.
- iii. Member States should be allowed under certain conditions to be determined to adapt the frequency of delivery and collection

¹⁵ User needs in the postal sector and evaluation of the regulatory framework.pdf (wik.org)

¹⁶ WiK evaluated the Postal Services Directive in order to identify potentials for improvement of rules within the Postal Services Directive. WiK did not, and were not required to, recommend whether or when it should be amended. The findings of this study will feed the European Commission's own evaluation which is a standard procedure for EU level legislation and overdue in the case of the Postal Services Directive. Any decision on amending it, or not, will be considered at the political level, after the European Commission's own evaluation has been accomplished by end 2021.

- of the USO (e.g. to alternate-day-delivery). A reliable postal service for all users should be guaranteed.
- iv. To ensure efficient universal service provision, Member States should be required to analyse the feasibility of market-based approach and procurement. To avoid excessive obligations, the Postal Services Directive should clarify Member States may ensure universal service provision separately for specific geographical areas or for specific services (e.g. in remote areas, registered and insured services, special customer groups). Designation for the whole territory, for all universal service should be only applied if needed and appropriate, and if principle of least market distortions is respected.
- v. Cross-border transit time requirements should focus on reliability.
- vi. Competitors, consolidators, and bulk mailers should be granted access to delivery networks on equal terms.
- vii. The Postal Services Directive should strengthen user protection and clarify that the rights of receivers are included within user rights.
- viii. Price regulation should focus on avoiding excessive pricing and ensuring transparency. Regular price control should be required only for single-piece services with the objective of avoiding excessive pricing.
- ix. Strengthen regulatory oversight on terminal dues; terminal dues set how much universal postal service providers are paid for delivery of international inbound mail (mail postal overseas for delivery domestically). The Postal Services Directive should strengthen regulatory competences to monitor terminal dues principles.

So, given the above, and given the changing postal sector, what future-proof regulation at EU and national level is needed for the postal sector?

(7) How should ComReg's role evolve?

Annex 2 summarises ComReg's current legislative remit for postal regulation. Are there any considerations for ComReg's role in terms of how it should evolve to wider or narrower role:

1. in respect of users' (consumers and business) experience and use of postal services, including protection of same and

- addressing the needs of specific social groups, in particular, disabled postal service users?
- 2. to facilitate competition and innovation in the postal sector?
- 3. to ensure the provision of a universal postal service that meets the reasonable needs of postal service users at an affordable price?
- 4. to monitor and ensure compliance by postal service providers?
- 5. to increase information gathering and dissemination in the sector?
- 16. These seven initial considerations, amongst others, will shape various elements of ComReg's forthcoming Strategy for postal regulation. ComReg would welcome views on the above seven initial considerations and any other considerations that should be considered by ComReg in its forthcoming postal strategy.

3 Summary of last Postal Strategy

17. To inform this Call for Inputs, the following sets out our last Postal Strategy.

Trends and Challenges 2020 - 2022

18. In our last Postal Strategy, we identified the following Trends and Challenges facing the postal sector.

Trends



Challenges



19. Where ComReg has a role or remit in addressing certain of these challenges these were considered in developing our three statements of strategic intent, describing our strategic intentions for postal regulation through the use of the regulatory powers that we have been provided by the Postal Act.

ComReg's Strategic Intentions 2020 - 2022

STRATEGIC 1 Seek to ensure the provision of a universal postal service

ComReg's statutory function includes ensuring the provision of a universal postal service that meets the reasonable needs of postal service users. With regard to this strategic intention, ComReg's strategic goals are to:

- · Goal 1: Continue to understand the reasonable needs of postal service users
- Goal 2: Consider the designation of universal postal service provider(s)
- · Goal 3: Monitor for compliance with the requirements of providing the universal postal service.

STRATEGIC 2



Promote the interests of postal service users

ComReg's second strategic intention is that postal service users (both senders and receivers) can choose and use postal services with confidence. Our strategy emphasises the role of informed decision-making by postal service users, and has the following strategic goals:

- Goal 4: Empower postal service users by ensuring the availability of accurate and appropriate information on postal services and cross border parcel services
- Goal 5: Empower postal service users by ensuring the availability of complaints and redress
 procedures
- Goal 6: Protect postal service users by ensuring postal service users, both senders and receivers, derive maximum benefit in terms of choice, price, and quality
- · Goal 7: Consult and co-operate with the Competition and Consumer Protection Commission
- · Goal 8: Resolve disputes between postal service users and postal service providers.

STRATEGIC 3



Facilitate the development of competition and innovation

ComReg's third strategic intention is to facilitate the development of competition and innovation in the provision of postal services and has the following strategic goals:

- · Goal 9: Facilitate the development of the postal sector by delivering on our legal remit
- Goal 10: Promote the development of the postal sector by continuing to provide information regarding the provision of postal services in Ireland.

4 Call for Inputs questions and how to respond

- **Question 1:** Do you consider that ComReg's forthcoming postal strategy should be limited to the period to 2024? please support your view with reasons and evidence.
- **Question 2:** What are the considerations (in the next two years and beyond) shaping the postal sector and ComReg's forthcoming postal strategy? please support your view with reasons and evidence.
- **Question 3:** What is your view on the seven initial considerations for the forthcoming strategy? Please support your view with reasons and evidence
- (1) Should we consider the blurring of sector boundaries and the interaction of different regulatory frameworks?
- (2) Should we consider other developments that may be impacting the postal sector?
- (3) What is the future of next day delivery letters and what could this mean for the universal postal service?
- (4) What actions are required to respond to environmental sustainability challenges?
- (5) How should International inbound universal postal service losses be addressed?
- (6) What regulation is needed in the postal sector?
- (7) How should ComReg's role evolve?
- **Question 4:** Are there any further considerations you would propose? Please support your view with reasons and evidence.
- **Question 5**: What do you consider should be ComReg's strategic intents and goals for postal regulation in the forthcoming postal strategy? please support your view with reasons and evidence.
- Question 6: What Trends, Challenges, ComReg's Strategic Intentions, and ComReg's goals set out in ComReg's last Postal Strategy Statement 2020 2022 remain relevant? please support your view with reasons and evidence.

- 20. ComReg welcomes all written responses by 5pm on Friday 20 August 2021. It will make the task of analysing responses easier if comments reference the relevant question numbers. In all cases, please provide evidence in support of your views.
- 21. Responses must be submitted in written form (post or email) to the following recipient clearly marked "Submissions to ComReg 21/67":

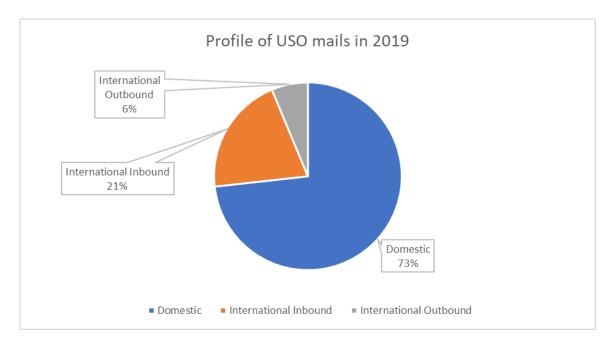
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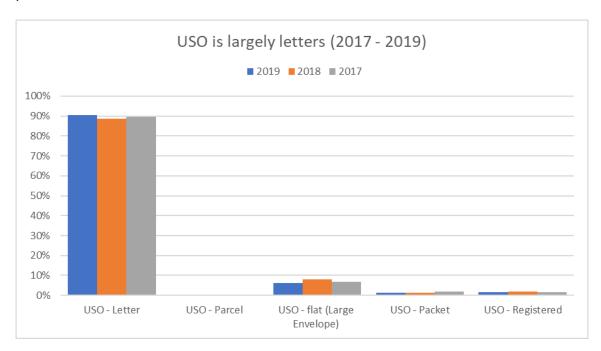
Annex 1: Universal postal service information 2017 - 2019

- A 1.1A universal postal service is an essential postal service, the provision of which is mandated by the State because the market concerned is not effectively competitive, meaning that there is no guarantee that the market, of itself, will ensure the provision of the service to all persons in the State, at an affordable price and to a sufficient level of quality. It is a form of protection for postal service users, to ensure universal access by all citizens of Ireland to send and receive post at an affordable price. The universal postal service protects vulnerable users and those that are digitally disadvantaged. In Ireland, usage of the universal postal service mainly consists of the posting of letters, a large proportion of which are posted by small and medium-sized enterprises ("SMEs").
- A 1.2The following information on the universal postal service, "USO", is sourced from An Post's Regulatory Accounts¹⁷, prepared in accordance with ComReg's Accounting Direction.
- A 1.3Delivery within Ireland (Domestic) is almost three quarters of the volume of the universal postal service, with delivery of international mail into Ireland (International Inbound) being just over one fifth, with remaining mail being for delivery overseas (International Outbound).

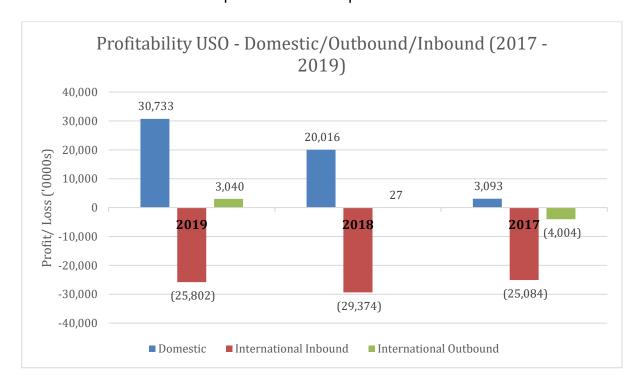


¹⁷ https://www.anpost.com/AnPost/media/PDFs/Regulatory%20Reports/Regulatory-Reports-2019.pdf are the latest available. The Regulatory Accounts 2020 are expected to be published by An Post shortly.

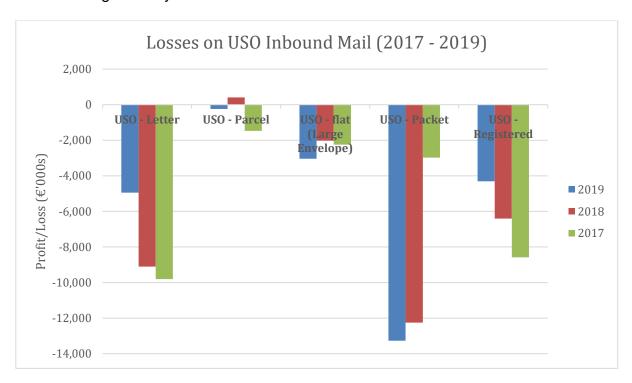
A 1.4 Letter mail currently makes up a significant majority of what is universal postal service mail. This has been sustained at approximately 90% of the universal postal service.



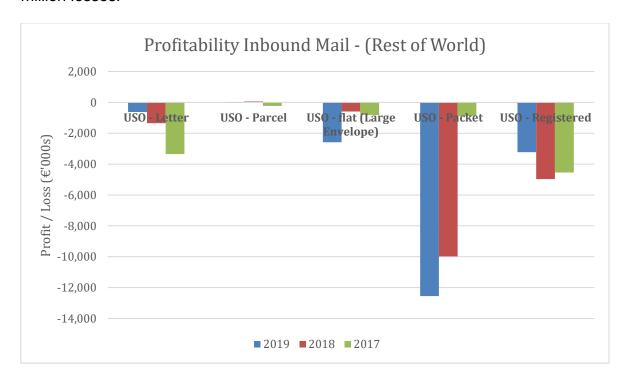
A 1.5 Universal postal service profitability has been growing from 2017 to 2019. Domestic (delivery within Ireland) universal postal service recorded a profit of almost €31 million in 2019, significantly up from a profit of just over €3 million in 2017. This has largely been driven by price increases on domestic and international outbound universal postal services. International inbound (posted abroad for delivery in Ireland) has recorded significant losses, losses of c.€25 million - €29 million per annum in the period 2017 to 2019.



A 1.6 Regarding these losses on international inbound universal postal service mail, losses on letters and registered have reduced, but losses on packets have increased significantly in 2018 and 2019.



A 1.7 These losses are mainly due to increased Rest of World (Asia) inbound packets with particularly heavy losses in 2018 and 2019 cumulating in c. €23 million losses.



Annex 2: Our current remit

- 1. Our remit to regulate postal services comes directly from legislation, in particular from the European Postal Services Directive¹⁸ transposed by the Communications Regulation (Postal Services) Act 2011 (as amended) ("the Postal Act").
- 2. The Postal Act fully opened the Irish postal market to competition in August 2011 and designated An Post as the sole universal postal service provider until 2023. As the postal market is fully liberalised, our remit set by the Postal Act is largely limited to the universal postal service.
- 3. A universal postal service is an essential postal service, the provision of which is mandated by the State because the market concerned is not effectively competitive, meaning that there is no guarantee that the market, of itself, will ensure the provision of the service to all persons in the State, at an affordable price and to a sufficient level of quality and while upholding the rights of postal service users. It is a form of protection for postal service users, to ensure universal access by all citizens of Ireland. The universal postal service protects vulnerable users and those that are digitally disadvantaged. In Ireland, the universal postal service mainly consists of the posting of letters, a large proportion of which are posted by small and medium-sized enterprises ("SMEs").
- 4. With regard to competition, our remit is to facilitate the development of competition and innovation in the market for postal service provision, subject to ensuring the availability of a universal postal service. Central to ComReg's regulatory role is the principle that well-functioning markets deliver optimal outcomes in terms of price, quality, choice, and access.
- 5. In general, our remit is largely a two-part role:
 - (1) A consumer protection role for postal services generally by monitoring and ensuring postal service providers comply with the obligations required of them under the Postal Act or by ComReg, to ensure that the interests of postal service users, both senders and receivers, are promoted and protected.

This includes:

 ensuring appropriate codes of practice are drawn up and implemented;

¹⁸ The objectives for postal services regulation have been implemented in EU law through the European Postal Services Directive - Directive 97/67/EC. This directive established a regulatory framework for European postal services and was amended by Directive 2002/39/EC and Directive 2008/6/EC.

- ensuring the availability of simple and inexpensive dispute resolution procedures carried out by a body independent of the parties involved; and
- consulting and co-operating with the Competition and Consumer Protection Commission who is responsible for the enforcement of a wide range of consumer legislation.
- (2) A wider regulatory role with regard to the universal postal service. The European Postal Services Directive and the Postal Act require that these universal postal services are regulated in terms of aspects of pricing, quality, and access.

6. Our remit does not include:

- other various non-postal services that are provided by postal service providers;
- other various non-postal services provided at post offices;
- Eircode.

ComReg's statutory functions and objectives

ComReg's statutory functions and objectives in relation to the regulation of postal services are set out in the Postal Act.

ComReg's statutory functions are:

- 1. To ensure the provision of a universal postal service that meets the reasonable needs of users; and
- 2. To monitor and ensure compliance by postal service providers with obligations imposed by or under the Postal Act in relation to the provision of postal services.

ComReg's statutory objectives are:

- 1. To promote the development of the postal sector and, in particular, the availability of a universal postal service within, to and from the State at an affordable price for the benefit of all postal service users;
- 2. To promote the interests of postal service users; and
- 3. Subject to 1 above, to facilitate the development of competition and innovation in the market for postal service provision.

In order to achieve these statutory objectives, ComReg must take all reasonable measures including the following:

1. Establishing such monitoring and regulatory procedures for the purposes of ensuring compliance by postal service providers with the obligations imposed on them;

- 2. Ensuring that postal service users may avail of a universal postal service that meets their reasonable needs:
- 3. In so far as the facilitation of competition and innovation is concerned, ensuring that postal service users derive maximum benefit in terms of choice, price and quality; and
- 4. In so far as the promotion of the interests of postal service users is concerned
 - a. Ensuring a high level of protection for postal service users in their dealings with postal service providers, in particular by
 - i. Ensuring the availability of simple and inexpensive dispute resolution procedures carried out by a body that is independent of the parties involved; and
 - ii. Consulting and cooperating with the Competition and Consumer Protection Commission as appropriate.
 - b. Addressing the needs of specific social groups, in particular, disabled postal service users.