



Media Release- 13 May 2003

ComReg: No Compulsory Roadside Letterboxes

The Communications Regulator, ComReg, said there is currently no provision in law that would allow An Post to oblige addressees to install a letterbox in the grounds of their home. While An Post can offer to provide such a letterbox, there is no obligation on the consumer to accept such a proposal, nor can An Post force people to avail of letterboxes some distance from their premises. ComReg issued its position on the controversial proposals by An Post in its response to a nationwide consultation on what constitutes a Universal Service from An Post. Over 1,000 people made their views known on issues such as roadside letterboxes, post-codes, how far people should have to travel to post a letter, frequency of collection and complaints procedures.

ComReg today also:

1. Directed An Post to collect post no earlier than 5.30pm for next day delivery from all towns of more than 1,500 people except for 11 towns where 5.30pm collection was likely to pose operational problems for An Post.
2. Confirmed that people will have to travel no more than 1km in a city area and 3km in a rural area to post a letter.
3. Specified how An Post should provide users with regular, detailed and up to date information about the Universal Service, and in particular required that they make it clear what services people are entitled to as of right and any other “value added” services that An Post provides in competition with other service providers.
4. Set out complaint guidelines for An Post and other postal service providers.
5. Required An Post to submit its Code of Practice for dealing with users for approval no later than 13 August 2003, to include its proposals for compensation / reimbursement.
6. Decided that for the purposes of the statutory definition of Direct Mail, 2,000 will be the ‘significant’ number of addresses for national delivery and 100 will be the number for local delivery.

Roadside letterboxes

ComReg has reviewed in detail An Post’s idea of installing mandatory postboxes either on road at the edge of a consumer’s property (garden gate letterboxes) or some distance away from their property (end- of- lane). While there clearly are merits in roadside letterboxes, and many people have installed them on their own initiative, ComReg notes that vulnerable groups, such as the elderly and the disabled, who depend on delivery to the front door, should be protected. While ComReg also notes the economic arguments made by An Post in relation to post boxes it does not believe that all other possibilities have been fully explored. For example, the option of collecting mail every morning from a post

office or delivery office free of charge might be attractive to some customers and would be very cost effective for An Post. ComReg also notes that packages/parcels have to be delivered to the front door and these are according to the OECD the fastest growing sector of the market.

Commenting on An Post's submission that persuasion will not work and that making the provision of roadside letterboxes mandatory is necessary to achieve the full benefits, ComReg Chairperson, **Etain Doyle** said "widespread mandatory provision of roadside letterboxes is neither possible in legal terms, nor desirable. Change can only be achieved by mutual acceptance and by An Post convincing the customer of mutual benefits, and by exploring all possible options. A sledgehammer approach to this issue will not work."

While there is provision for ComReg to allow a derogation from the legal obligation to make daily deliveries to the home or premises of every natural or legal person, this is not a power that can be used to allow An Post to avoid the obligation to make daily deliveries to the home or premises of a significant number of addressees. The responses to the consultation suggest that there may, however, be some exceptional circumstances, for example, in the case of where there is no secure location for accepting delivery, where it may be appropriate to grant a derogation. A further consultation will be held on this in the autumn.

Post-Codes

ComReg sought views on postcodes in its wide-ranging review on the postal service in Ireland. The direct marketing industry, bulk mail consolidators and express (courier) industry expressed strong support for postcodes on the grounds of efficiency. Health authorities, large utility companies, and banks also indicated they were a very good idea. Others felt that post-codes would detract from Ireland's heritage of Irish place names while An Post believes that modern technology renders post-codes obsolete. ComReg proposes to raise this issue with the Minister for Communications, Marine and Natural Resources and will convene a conference of all postal service providers and representatives of major users of the post and other stakeholders to consider post-codes in more detail.

Collection Times

ComReg has directed An Post to collect post no earlier than 5.30pm for next day delivery from all towns of more than 1,500 people except for 11* towns in which post will continue to be collected earlier. This decision prevents An Post from setting a 'latest' posting time in any other town earlier than 5.30pm. An Post will now be required to provide a later collection than was previously the case in 18 towns. Mostly these are in the hinterlands of Dublin and Cork such as Kilcullen, Leixlip and Carrigaline which have grown in recent years. In setting collection times, ComReg has striven to strike a balance between meeting the needs of users while avoiding imposing significant additional obligations on An Post.

Organisations which made its views known to ComReg on this public consultation included An Post, The General Council of County Councils, FEDMA (the European Direct Mail Federation), the Consumer Association of Ireland, Muintir na Tire, Age Action Ireland, Association of Express Carriers, Southwestern Regional Authority, IBEC, SFA and Roscommon County Development Board to name a few.

* *Bantry, Skibberreen, Cootehill, Ballybofey-Stranorlar, Ballyshannon, Bunrana, Bundoran, Carndonagh, Lifford, Dingle, Ballina*

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