



An Coimisiún um  
**Rialáil Cumarsáide**  
Commission for  
**Communications Regulation**

# ComReg's Postal Quality of Service Monitor – Regulatory Procedures

## Universal Postal Service Quality of Service

### Postal QoS Monitor - Regulatory Procedures

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**An Coimisiún um Rialáil Cumarsáide**  
**Commission for Communications Regulation**

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# ComReg’s Regulatory Procedures for the statutory Postal Quality of Service Monitor

## Background

Under the Communications Regulation (Postal Services) Act 2011 (“2011 Act”), the Commission for Communications Regulation (ComReg) is the designated national regulatory authority for the postal sector with the overarching function to ensure the provision, throughout the State, of a universal postal service that meets the reasonable needs of postal service users.

Chapter 3, Section 16 of the 2011 Act sets out the meaning of the “universal postal service”<sup>1</sup>. Essentially, the designated universal postal service provider (DUPSP) in the State must provide at least one clearance and one delivery to the home or premises of every person in the State on every working day, except in such circumstances or geographical conditions as ComReg considers to be exceptional. Any derogations from provision of the universal postal service in respect of certain working days shall be in accordance with ComReg Document 14/135 (D14/14), as may be amended from time to time.

An Post is currently the DUPSP for the State<sup>2</sup>, however these Regulatory Procedures will apply to any DUPSP<sup>3</sup> and references to “DUPSP” in this document should be interpreted accordingly.

ComReg’s statutory functions include setting quality-of-service performance standards for the provision of the universal postal service, and monitoring compliance with those regulatory standards. Quality of Service (“QoS”) standards means the QoS performance standard drawn up by ComReg under section 32(1) of the Act of 2011, to be achieved by the DUPSP in respect of the end-to-end transit time of domestic “Single Piece Priority Mail<sup>4</sup> and First Class Mail<sup>5</sup>” as that term is defined in I.S. EN 13850:2020 (“the technical standard”) and is expressed as the percentage of such mail which shall be delivered by the DUPSP on the working day immediately following the day of posting, if posted prior to the last collection time<sup>6</sup>. In 2015, and following a public consultation (ComReg Document 15/126 D07/15), ComReg issued a direction to An Post, the current DUPSP, which set

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<sup>1</sup> ComReg Document SI 280 of 2012 also includes universal postal service specifications.

<sup>2</sup> Under Section 18 of the 2011 Act and ComReg Document 23/53, (D03/23). This designation applies until 1 August 2029, unless amended by ComReg.

<sup>3</sup> Designated under the 2011 Act

<sup>4</sup> I.S. EN 13850:2020 (Title) Postal services - Quality of services - Measurement of the transit time of end-to-end services for single piece priority mail and first class mail - *Terms and definitions* **3.59 - single piece mail** - postal items posted and distributed via a postal service for which a ‘single piece tariff’ for individual postal items is set in the general terms and conditions of the postal service provider that receives the payment [Note 1 to entry: Single piece mail may be inducted using different modes of payment as long as the induction of individual postal items is not restricted. / Note 2 to entry: Excluded are all postal services that contain further requirements on the induction like, for example, the registration of items, minimum induction volumes, equal contents or a pre-sortation of the inducted mail.]

<sup>6</sup> I.S. EN 13850:2020 ‘3 *Terms and definitions – Para. 3.33 last collection time* - advertised last time for collection or contracted latest time for collection. [Note 1 to entry: This is often not equal to the actual collection time, because from the postal work-organisation point of view, the collection usually happens some time later than the advertised last collection time (e.g. the collection routing timetable can only be defined with some tolerance).] [Note 2: The term “Latest Time of Posting” (“LTOP”) has the same meaning as the term “last collection time”, as defined in paragraph 3.33 of I.S. EN 13850:2020, meaning you must post before this time to achieve next working day delivery.]

quality of service performance standards to be achieved by the DUPSP for the provision of the universal postal service in the State.

The performance standards are expressed in percentage terms as follows:

*(i) 94% of all Single Piece Priority Mail posted in the State for delivery in the State, shall be delivered by the DUPSP on the working day which immediately follows the day of posting; and*

*(ii) 99.5% of all Single Piece Priority Mail, posted in the State for delivery in the State, shall be delivered by the DUPSP within three working days immediately following the day of posting.*

ComReg is also statutorily required under the 2011 Act to monitor compliance by the DUPSP with its performance against the QoS standards and to publish an annual report on the results of its monitoring. EU legislation requires that, in any Member State, the quality of the universal postal service shall be measured by a body that is independent<sup>7</sup> of the provider of that service. The quality of the universal postal service must also be measured using statistical methods set out by the European Standards Institute (CEN) and mandated by the European Commission.<sup>8</sup>

Every three years, following competitive tendering processes in accordance with public procurement rules, an independent QoS monitor operator, an independent QoS monitor auditor and a Real Mail Study auditor is commissioned. The role of the independent QoS monitor operator is to independently monitor the performance quality of the provision of the universal postal service by the DUPSP, in accordance with the relevant CEN technical standard and to produce an annual report on that monitoring.<sup>9</sup> For monitoring purposes, the ‘universe of post’ is defined as all single piece priority mail and first-class mail posted and delivered within the State. Monitoring is conducted via a nationwide panel of private and business individuals, posting and receiving mail on a continuous basis. The quantum and format of mail posted and received by monitor panellists as part of QoS monitoring is based on a Real Mail Study (“RMS”) carried out by the DUPSP (and audited by the RMS Auditor) which replicates the mail flows in its operations.<sup>10</sup> (Where RMS data is not available the provisions in I.S E.N. 13850:2020 Para 6.3 will be used). These QoS Regulatory Procedures include a section relating to the audit of the RMS (see Annex 3). The QoS monitor measures the rate of delivery of domestic single piece priority mail, postal packets<sup>11</sup> posted within the State for delivery within the State. The QoS monitor excludes “bulk mail” which often involves a deferred delivery in return for a

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<sup>7</sup> I.S. EN 13850:2020 Terms and definitions **3.30** – ‘**independent performance monitoring organisation** - body charged with the monitoring of the QoS according to the methodology specified in this standard, which is external to, and having no links of ownership or control with the postal operator thus monitored’.

<sup>8</sup> I.S EN 13850:2020 - **Regulatory background** - The regulatory basis of EN 13850 is laid out in the 97/67/EC, as amended by Directive 2002/39/EC and Directive 2008/6/EC. Main guidance is given in Chapter 6 Quality of Service. Article 16 states: “Member States shall ensure that quality-of-service standards are set and published in relation to Universal Service in order to guarantee a postal service of good quality”. Furthermore, EN 13850 is mandatory for measuring the performance levels of single piece priority or first class mail which falls under the universal service.

<sup>9</sup> Ipsos currently monitors the QoS performance of USO provision by the DUPSP. The current QoS monitor contract is in place until the end of the 2024 monitoring year.

<sup>10</sup> Frontier Economics was commissioned to independently audit the RMS operations and results, in accordance with the relevant technical standard.

<sup>11</sup> As defined in Section 6 of the 2011 Act.

price discount. KPMG was commissioned as QoS Monitor Auditor to produce an annual audit report on the QoS Monitor.<sup>12</sup>

### **Expiry of the Quality-of-Service Settlement Agreement (QoS SA)**

On 10 June 2014 ComReg and An Post reached a settlement agreement in the context of High Court proceedings (Case No. 2012/45 MCA) relating to the quality-of-service performance by An Post, the DUPSP at the time. The 2014 QoS SA, in accordance with its terms, expired on 1 August 2023.

ComReg is required by section 32(5) of the 2011 Act at least once each year, to monitor compliance with quality-of-service standards.

ComReg is of the view that certain provisions contained in the QoS SA remain relevant with regard to ‘*reflect(ing) national needs and peculiarities*’<sup>13</sup> and as such are enhancements to the relevant CEN technical standard and to the independence requirements<sup>14</sup> of the monitor. Therefore, it intends to retain those provisions in the design and operation of the Quality of Service Monitor along with some other small adjustments, as set out hereunder in this QoS Monitor - Regulatory Procedures document. ComReg is now publishing these QoS Regulatory Procedures on how these provisions will be included in the statutory QoS monitor, which will provide transparency for monitor operators and auditors (both Monitor and RMS) and the DUPSP, as well as for postal service users.

### **Publication and Commencement dates of ComReg’s QoS Regulatory Procedures**

The publication date shall be the commencement date of ComReg’s QoS Monitor - Regulatory Procedures<sup>15</sup> for all stakeholders including the DUPSP, the QoS Monitor Operator, the QoS Monitor Auditor and the RMS Auditor, and these QoS Regulatory Procedures will be included in all QoS monitoring related contracts from thereon, where appropriate and necessary.

Where QoS related contracts are currently in place on publishing day, and remain functioning until 31 December 2024, the specifications of the QoS SA currently in place in those contracts will remain until a new or amended contract is put in place.

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<sup>12</sup> KPMG was commissioned as QoS Monitor Auditor up to the end of 2023 monitoring to produce an annual audit report following completion of an extensive audit to ensure independent and absolute audit certification that the annual QoS monitor and results are carried out in accordance with the 2011 Act and the relevant requirements of the relevant CEN technical standard, and that the results are materially reliable and robust. KPMG’s audit (which included an interim audit at the end of the six-month period and a final annual audit at the end of the year) of the QoS monitor covered among other things the monitor’s documentation, processes, controls and statistical results.

<sup>13</sup> I.S. EN 13850:2020 Introduction – General: ‘*The Commission has acknowledged that the different postal traditions and cultures in Europe would not allow for the establishment of one common unified European measurement system and that national systems should have sufficient freedom to reflect national needs and peculiarities*’.

<sup>14</sup> I.S. EN 13850:2020 Terms and definitions 3.30 – ‘***independent performance monitoring organisation - body charged with the monitoring of the QoS according to the methodology specified in this standard, which is external to, and having no links of ownership or control with the postal operator thus monitored***’

<sup>15</sup> In the Monitor Operator, Monitor Auditor and RMS Auditor Handbooks included in the published Procedures, references to sections / paragraphs of the I.S EN 13850:2020 technical standard in the first column of the Booklets (marked by blue font) relate to the section/paragraph numbers as they appear in the technical standard booklet itself.

# The Postal Quality of Service Monitor - Regulatory Procedures:

## 2. Independent QoS Monitor Operator

- 2.1. ComReg, following a competitive tender process conducted in accordance with public procurement rules, will enter into a contract with the successful tenderer who will be appointed as the QoS Monitor Operator. Generally, the contract will be for a period of not less than 36 months, when a renewal of contract is required, unless for specific reasons ComReg determines a different contract period, or an extension of current contract is required. If any changes are required to the 36-month contract period ComReg will advise the QoS Monitor Operator, the DUPSP and the QoS Monitor Auditor.
- 2.2. The QoS Monitor Operator will design and operate the statutory QoS monitor, in accordance with the Act of 2011 and the relevant CEN technical standard<sup>16</sup>, and with ComReg's QoS Monitor - Regulatory Procedures (ComReg Doc. 24-72) where appropriate, particularly the Monitor Handbook at Annex 1 to this document.
- 2.3. The statutory QoS Monitor will measure the performance of postal packets against the regulatory standard.
- 2.4. The national postcode system called 'Eircode' was introduced in Ireland in July 2015. The contract between ComReg and the QoS Monitor Operator will specify that all test mail items in the QoS Monitor shall now bear the correct postcode and the correct postal address which is contained in the 'Eircode' database of postal addresses. The Preferred Tenderer will be required to procure access to the Eircode database and to ensure that the most recent version of this database is used for all address validations that are performed. The Auditor will make a statement in the annual Audit Report confirming that this has taken place.
- 2.5. ComReg will provide the DUPSP with copies of its draft request for tender document, in respect of the selection and appointment of the QoS Monitor Operator, and ComReg will consider any comments or suggestions made by the DUPSP in respect of same, though ComReg will determine the final content of this document.
- 2.6. The request for tender will specify that the ability of the QoS Monitor Operator to design and operate a statutory QoS Monitor of sufficient quality shall be a more significant selection criterion than the cost of providing those services.
- 2.7. The contract between ComReg and the QoS Monitor Operator will specify that the QoS Monitor Operator has a duty of care to ComReg and to the DUPSP.
- 2.8. ComReg will publish the annual results of the statutory Monitor and the annual published results shall contain separate results for (a) the year in full, (b) December of that year, and (c) the remaining eleven months of that year, excluding December.

## 3. Independent QoS Monitor Auditor

- 3.1. ComReg, following a competitive tender process conducted in accordance with public procurement rules, will enter into a contract with the successful tenderer who shall be appointed as the QoS Monitor Auditor. Generally, the contract will be for a period of not less than 36 months, when a renewal of contract is required, unless for specific reasons ComReg determines a different contract period, or an extension of current contract is required. If any

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<sup>16</sup> See Para 7 on Page 6 for references to the technical standards to be used.

changes are required to the 36-month contract period ComReg will advise the QoS Monitor Auditor, the DUPSP and the QoS Monitor Operator.

- 3.2. The QoS Monitor Auditor will progress its audit of the statutory QoS Monitor during the course of any year in accordance with its audit schedule timetable for the 6 month interim audit and the end-of-year final audit<sup>17</sup>, and shall produce an annual audit report in respect of same, in accordance with the Act of 2011, the relevant CEN technical standard, and also taking full account of the QoS Monitor Auditor Handbook (Annex 2 of this document).
- 3.3. The QoS Monitor Auditor's report will, amongst other things, confirm whether the statutory monitor was conducted in accordance with the relevant CEN technical standard, taking full account of the Monitor Handbook, and if necessary, shall also identify any remedial or corrective actions which ought to be made by the QoS Monitor Operator.
- 3.4. ComReg will provide the DUPSP with copies of its draft invitation to tender document, in respect of the selection and appointment of the QoS Monitor Auditor, and ComReg will fully consider any comments or suggestions made by the DUPSP in respect of same, though ComReg will determine the final content of this document.
- 3.5. The invitation to tender will specify that the ability of the QoS Monitor Auditor to progress an audit of sufficient quality will be a more significant selection criterion than the cost of providing that service.
- 3.6. The contract between ComReg and the QoS Monitor Auditor will specify that the QoS Monitor Auditor has a duty of care to ComReg and the DUPSP.

#### **4. Independent Real Mail Study (RMS) Auditor**

- 4.1. ComReg, following a competitive tender process conducted in accordance with public procurement rules, will enter into a contract with the successful tenderer who shall be appointed as the RMS Auditor. Generally, the contract will be for a period of not less than 36 months, when a renewal of contract is required, unless for specific reasons ComReg determines a different contract period, or an extension of current contract is required. If any changes are required to the 36-month contract period ComReg will advise the RMS Auditor, the DUPSP, and the QoS Monitor Auditor.
- 4.2. The RMS Auditor will be responsible for conducting an audit of any Real Mail Study and will produce an annual audit report in respect of same which, amongst other things, will confirm whether the Real Mail Study was conducted in accordance with the Act of 2011 and the relevant CEN technical standard and, if necessary, will identify any remedial or corrective actions which ought to be taken by the DUPSP.
- 4.3. In the event that instead of RMS an alternative design basis may be necessary<sup>18</sup> (for example the use of logistics/management data for commencement of first measurement period) this will also be audited by the Independent RMS Auditor in accordance with the relevant CEN technical standard.
- 4.4. ComReg will provide the DUPSP with copies of its draft invitation to tender document in respect of the RMS Auditor and ComReg will fully consider any comments or suggestions made by the DUPSP in respect of same, though ComReg will determine the final content of this document.

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<sup>17</sup> The QoS Monitor Auditors schedule timetable will accord with the relevant timelines in this document.

<sup>18</sup> I.S. EN 13850:2020 paragraph 6.3.

- 4.5. The contract between ComReg and the RMS Auditor will specify that the RMS Auditor will comply with the relevant CEN technical standard and has a duty of care to ComReg and the DUPSP.

## **5. Independence of QoS Monitor Operator, QoS Monitor Auditor, and RMS Auditor**

- 5.1. The QoS Monitor Operator, the QoS Monitor Auditor and the RMS Auditor will all be separate persons or bodies, having no connection in any way whatsoever to one another or with the DUPSP, the regulated entity. Any reference in this document to any of the three roles above is to mean that they are independent of each other and of the regulated entity.
- 5.2. The final QoS Monitor Interim Audit Report (the 6 month report) and the final QoS Monitor Annual Audit Report, when completed by the selected Monitor Auditor, will be made available to the DUPSP

## **6. Monitor Results published by ComReg**

- 6.1. All monitor results published by ComReg will be based on the QoS Monitor results as audited by the QoS Monitor Auditor.

## **7. Integrity of the QoS Monitor**

- 7.1. The integrity of the QoS Monitor (and in particular any risk to the identification of monitor panellists) shall be inviolable at all times, in accordance with I.S. EN 13850:2020.

## **8. The CEN Standards**

- 8.1. The CEN technical standard I.S EN 13850:2020: *Postal Services - Quality of Services - Measurement of the transit time of end-to-end services for single piece priority mail and first class mail* will be used in the QoS Monitor for measurement of the transit time of end-to-end services for single piece priority mail and first class mail.
- 8.2. CEN technical standards may be amended (or newer versions developed) and adopted from time to time. The most up to date CEN technical standard, adopted and in place for the State<sup>19</sup> at any given time, will be the technical standard to be used in the QoS Monitor.

## **9. Amendments to these QoS Regulatory Procedures**

- 9.1. There may be changes to the universal postal service specifications and/or the monitoring of the performance of provision of that service from time to time which will necessitate amendment(s) to these QoS Monitor Regulatory Procedures. ComReg will communicate any changes to the Regulatory Procedures in all cases, minor and major. A draft of an amendment(s) of a minor or a major nature will be provided to the DUPSP as soon as feasible for comment. ComReg will then fully consider any comments received from the DUPSP,

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<sup>19</sup> The National Standards Authority Ireland (NSAI) is responsible for the development of Irish Standards, representing Irish interests in the work of the European and International standards bodies CEN and ISO, and for the publication and sale of Irish Standards.

however the final decision on the content of the Procedures is ComReg's alone. But amendments of a major nature only will result in a re-publishing of the QoS Monitor - Regulatory Procedures.

## **10. Derogation Days**

The days of derogation from provision of the Universal Postal Service by the DUPSP in place until 1 August 2029, as allowed in the decision in ComReg Document 14/135 (D14/14), will remain as set out in that decision, unless amended. The procedures for amendments will be dependent on the nature of the changes.

## **11. Future use of electronic transponders in the QoS Monitor**

ComReg may in future consider the use of electronic transponders in the QoS Monitor operations, in accordance with the relevant technical standards and subject to ComReg being satisfied that the integrity and efficacy of the QoS Monitor would not be compromised in any way. Should further consideration of electronic transponders be contemplated, ComReg will engage with the DUPSP and the QoS Monitor operator.



## 12. ANNEX 1.

### QoS Monitor Handbook

<p><b>Reference to section or paragraph in I.S. EN 13850:2020 - Postal Services - Quality of Services - Measurement of the transit time of end-to-end services for single piece priority mail and first class mail</b></p>	<p><b>Implementation of I.S. EN 13850:2020 in the Irish context.</b></p>
<p><b>0. Introduction</b></p> <p><b>0.1 General</b></p>	<p>This document (Annex 1) shall be called the “QoS Monitor Handbook”.</p> <p>The purpose of this QoS Monitor Handbook is to reflect national needs and peculiarities in the postal sector in Ireland and to provide enhanced information, with respect to the specifications contained in the CEN technical standard I.S. EN 13850:2020, as required.</p> <p>In this QoS Monitor Handbook, “QoS Monitor Operator” means the person or body appointed by ComReg to design and operate a QoS Monitor for measuring the performance quality of the universal postal service (Single Piece Domestic Priority and First-Class mail) as provided by the DUPSP(s).</p> <p>In this QoS Monitor Handbook, the system for measuring the quality of the universal postal service provided by the DUPSP(s) is described as the “QoS Monitor”. This term shall be taken to mean the QoS Monitor in place at the date of publication of these QoS Regulatory Procedures, or any subsequent replacement QoS Monitor, as appropriate.</p> <p>The QoS Monitor Operator shall design—and operate any QoS Monitor in accordance with the Communications Regulation (Postal Services) Act 2011 (“Act of 2011”) and the relevant CEN technical standard I.S. EN 13850:2020 and taking full account of the QoS Monitor Handbook.</p> <p>The QoS Monitor Handbook will be updated, if necessary, to reflect any additional requirements that may arise from the introduction of any changes to the current monitor design and operation in place, and/or to any changes to the universal postal service specifications.</p> <p>Annexes 4, 5 and 6 in this Document form part of the QoS Monitor Handbook.</p> <p>A non-disclosure agreement (NDA) will be included in the contract between ComReg and the QoS Monitor Operator.</p>
<p><b>3 Terms and definitions</b></p>	<p>The terms “rural” and “urban”, as defined in paragraphs 3.56 and 3.68 I.S. EN 13850:2020, respectively, shall be construed by reference to the definition of “town area” contained in ComReg direction to An Post D11/03 (contained in ComReg Doc 03/50) in which “town area” is defined as: <i>“The population residing in clusters of 1,500 or more inhabitants or as defined by the Central</i></p>

	<p><i>Statistics Office for the purposes of the Census of Population, Aggregate Town Area, or any County Town as set out in the Government’s National Spatial Strategy.”</i></p> <p>The term “city”, as defined in paragraph 3.8 of I.S. EN 13850:2020, shall mean any of the five cities of Dublin, Cork, Limerick, Galway and Waterford, to include suburbs and environs, and as defined by the Central Statistics Office from time to time.</p> <p>The term “Latest Time of Posting” (“LTOP”) has the same meaning as the term “last collection time”, as defined in paragraph 3.33 of I.S. EN 13850:2020 meaning you must post before this time to achieve next working day delivery.</p>
<p><b>5 Transit time as a Quality-of-Service indicator</b></p> <p><b>5.1 General &amp; 5.2.1 Measurement unit</b></p>	<p>The QoS Monitor shall express the overall transit time QoS level as the percentage of mail distributed within J+1 and J+3 days, end-to-end, against a regulatory performance standard of 94% and 99.5%, respectively, as may be amended from time to time.</p>
<p><b>5.2.2 Continuity of measurement &amp; Annex H.3.5 Force majeure</b></p>	<p>The DUPSP will notify ComReg, as soon as possible, of the occurrence of any event which it considers to be a <i>force majeure</i> event affecting the provision of the universal postal service. The DUPSP will include all required information with any such notification.</p> <p>The DUPSP should subsequently apply to ComReg seeking a deduction from the QoS Monitor, on the basis that an event as previously notified, and which the DUPSP considers to be a <i>force majeure</i> event, has materially impacted on a significant part of its postal network for a full 3 days or more of distribution.</p> <p>ComReg will only consider such applications that are supported by relevant information. Applications will be assessed on a case-by-case basis and in respect of the current quality of service standard, the current 0.4% allocation in respect of <i>force majeure</i> events shall not apply. ComReg will discuss with the DUPSP any aspects of an application by the DUPSP.</p> <p>In respect of any such application made by the DUPSP, ComReg will first form a determination as to whether a <i>force majeure</i> event did occur having regard to clauses 5.2.2 and at H.3.5 of I.S. EN 13850:2020. If ComReg should determine that a <i>force majeure</i> event did occur, ComReg will then proceed to assess the impact of that <i>force majeure</i> event on the universal postal service, in terms of establishing the relevant geographic area and time period in which the universal postal service was materially impacted upon.</p> <p>Where ComReg has determined the impact of a <i>force majeure</i> event on the universal postal service, the QoS Monitor Operator shall then determine whether excluding the relevant geographic area and time period from the QoS Monitor would materially impact on the QoS Monitor performance result. If it would do so, the QoS Monitor Operator shall adjust the results of the QoS Monitor, so as to exclude the relevant geographic area and time period. In doing so, the QoS</p>

	<p>Monitor Operator shall also prepare a report, clarifying whether the exclusion causes any material impact on the Discriminant Mail Characteristics<sup>20</sup> (DMCs).</p> <p>ComReg shall make a determination as soon as possible in respect of any application by the DUPSP relating to a <i>force majeure</i> event, but in any event in advance of publishing any annual performance results of the QoS Monitor.</p>
<p><b>5.2.3 Calculation of the transit time</b></p>	<p>Annex B.2.1 of I.S EN 13850:2020 is the applicable working week calculation rule.</p> <p>Under section 16(1) of the 2011 Act, the universal postal service consists in at least one clearance and one delivery to the home or premises of every person in the State on every working day, except in such circumstances or geographical conditions as ComReg considers exceptional.</p> <p>Saturdays, Sundays and public holidays, as may be amended from time to time, are excluded from the QoS Monitor. In addition, any working day which ComReg may deem to constitute an exceptional circumstance, such that the obligations under Section 16(1) of the 2011 Act shall not apply to that day, shall also be excluded from the QoS Monitor.</p> <p>The days of derogation from provision of the Universal Postal Service by the DUPSP in place until 1 August 2029, as allowed in the decision in ComReg Document 14/135 (D14/14), will remain as set out in that decision, unless amended. The procedures for amendments will be dependent on the nature of the changes.</p> <p>For the purpose of the QoS Monitor only, postal service users availing of P.O. Boxes, Callers Service, Freepost, Business Reply, Redirection, Mailminder and Schools Callers Services are excluded from the QoS Monitor. The exclusion of such postal service users from the QoS Monitor does not otherwise affect the designated universal postal service provider’s legal obligations in respect of such postal service users.</p> <p>For mail test items in the QoS Monitor that cannot be delivered, the date noted on the ‘Docket in Box Notice’ (“DIB”) (or other type of similar notice) shall be recorded as the date of delivery.</p> <p>No assumptions will be used for calculating QoS transit time performance. Any future assumptions (if required) will be as advised by ComReg to the DUPSP and to the Independent Operator.</p>
<p><b>5.3 Service performance indicators</b></p>	<p>Mail test items in the QoS Monitor that are not delivered by J+30 will be excluded from the QoS Monitor. As such, the annual report calculations cannot commence sooner than J+30.</p>

<sup>20</sup> I.S. E.N. 13850:2020 - 3.21 discriminant characteristic - characteristic affecting the outcome [Note 1 to entry: In this standard a characteristic is discriminant when the transit time significantly differs according to the different modes of the characteristic (see 6.4.2).]

	<p>Monthly QoS reports, to be provided on a monthly basis, will be provided by ComReg to the DUPSP excluding the J+30 rule above and without the aimed for target of +/-1% standard of accuracy.</p> <p>Mail delivered by J+1 and J+3 will be reported.</p>
<p><b>6 Methodology</b></p> <p><b>6.2.1 Domestic measurement systems</b></p>	<p>The QoS Monitor methodology will aim to reach a statistical measurement accuracy of +/-1% at a 95% confidence level for the overall annual result of the QoS Monitor. In order for the methodology to aim for this level of accuracy, the QoS Monitor Operator, in designing and operating the QoS Monitor, shall ensure that an appropriate minimum sample size of test mail items is put in place to ensure an appropriate number of valid test mail items. Test mail items will be distributed on a monthly basis in accordance with the CEN technical standard I.S EN 13850:2020, and the RMS audited data, but with no less than 2600 test mail items distributed in any month.</p>
<p><b>6.3 Determination of the design basis</b></p> <p><b>6.3.1 General &amp;</b></p> <p><b>6.3.3 Design basis</b></p>	<p>The design basis will be based on the DUPSPs Real Mail Study<sup>21</sup> (“RMS”), conducted on a continuous basis throughout each year and audited by the RMS Auditor, and in accordance with the relevant CEN technical standard. *</p> <p>The DUPSP shall provide the unaudited results of its RMS (to include the actual results, the sampling plan, and the operational plan) to ComReg and to the RMS Auditor in tranches from September to the end of December in each year, following completion of the RMS survey.</p> <p>The annual results of the DUPSP’s RMS shall be audited by the RMS Auditor in accordance with the Act of 2011 and the relevant CEN technical standard and taking full account of the RMS Auditor Handbook. (See Annex 3 of this Document).</p> <p>The RMS audit shall be completed by the end of April in each year and the RMS Auditor’s final report sent to ComReg and the DUPSP by the 5<sup>th</sup> working day of May.</p> <p>The audited RMS will be provided to the QoS Monitor Operator as soon as possible thereafter, for implementation in the QoS Monitor for the next calendar year.</p> <p>* In the event that appropriate RMS study data is not available, ComReg will consider using alternative data, in accordance with paragraph 6.3 of I.S. EN 13850:2020, in order to base the design (For example in year one of a measurement alternative data / estimate of data such as logistics / management / historical data of the DUPSP will be used).</p> <p>ComReg may require the DUPSP to provide this logistics / management / historical information in order to base the design. The type of logistic /</p>

<sup>21</sup> “Real Mail Study” has the meaning set out in I.S EN 13850:2020

	management / historical data on which the design is based shall be audited by the RMS Auditor and shall be stated in the report.
<b>6.4 Discriminant Mail Characteristics (DMC)</b>  <b>6.4.2 Determination of the discriminant mail characteristics</b>	The list of DMCs shall be those provided in the RMS as per the headings listed in Annex 4 of this document. The list may be revised by ComReg from time to time.
<b>6.4.3 Geographical stratification</b>	<p>Based on the current DUPSP’s network and operations the QoS Monitor shall consist of the following 70 postal areas:</p> <ul style="list-style-type: none"> <li>• each of the 26 counties and, in addition - <ul style="list-style-type: none"> <li>○ the 22 Dublin postal districts;</li> <li>○ the cities of Cork, Waterford, Galway and Limerick; and</li> <li>○ postal areas encompassed by the following DSUs - Athlone, Balbriggan, Blackrock, Bray, Carlow, Cork South City (separate from the remainder of Cork City) Drogheda, Dundalk, Ennis, Glenageary, Kilkenny, Letterkenny, Maynooth, Naas, Navan, Newbridge, Swords/Malahide, and Tralee</li> </ul> </li> </ul> <p>The 70 postal areas referred to above may change, dependant on changes to the DUPSPs network, or dependent on the relevant designation of the DUPSP(s), and references to “70 postal areas” should be construed accordingly.</p> <p>Panellists in the QoS Monitor will be distributed across all of the 70 postal areas.</p> <p>Boundaries between postal areas will be determined by postal addresses and the current DUPSP will provide the details of any postal address boundaries to ComReg, upon request.</p> <p>Panellist performance for the additional areas above will also count for the ‘associated county’ performance<sup>22</sup>. The QoS monitor operator in selecting and managing panellists, will make every effort to ensure that the identity of panellists, particularly those at the additional areas above, are not compromised.</p> <p>The geographical stratification breakdowns in the QoS monitor will be as per the RMS and the listing stated at Annex 5 of this document.</p>
<b>7 Report</b>  <b>7.1 Measurement results</b>	<p>Following audit, ComReg shall publish the audited annual results of the QoS Monitor for:</p> <ul style="list-style-type: none"> <li>(a) the year in full (showing the quarterly trends building up to the annual result);</li> <li>(b) December of that year; and</li> <li>(c) the remaining eleven months of the year, excluding December.</li> </ul>

<sup>22</sup> i.e. The performance achieved by any Panellist based in an urban Postal Area will also count for the performance of the county in which the urban Postal Area is located. For example: if a Panellist is based in Drogheda his/her performance will count for the Drogheda Postal Area but also for the County Louth Postal Area.

	ComReg will provide the DUPSP with monthly results (without the aimed for target of +/-1% accuracy requirement) in the format set out at Annex 6, as soon as possible after each month's end.
<b>7.3 Weighting of the results</b>	The QoS Monitor Operator will set out the weighting methodology to be used in the QoS Monitor.
<b>7.4 Content and timing</b>	The annual report and interim reports will present the results of the QoS Monitor in the format set out at Annex 6.
<b>8 Quality control and auditing</b>	<p>The annual result of the QoS Monitor will be audited by the QoS Monitor Auditor appointed by ComReg, in accordance with the 2011 Act and the relevant CEN technical standard and the QoS Monitor Handbook and the QoS Monitor Auditor Handbook.</p> <p>[Three weeks after the J+30 has passed<sup>23</sup> (See H 3.4 below in this Handbook) and following receipt of the 'Audit Documentation/Data Request' list from the QoS Monitor Auditor in the previous week (see H 6.5 below in the QoS Monitor Auditor Handbook)) the QoS Monitor Operator and the QoS Monitor Auditor shall meet to agree the dates for the data transfer of the Documentation/Data Requests, which in turn will allow the Audit work processes to commence. ]</p>
<b>Annex C Quality Control &amp; Auditing</b>  <b>C.1 Quality Control</b>	<p>The QoS Monitor Operator, as part of designing and operating the QoS Monitor, will produce its written "Operator Manual" which will include the following information:</p> <ul style="list-style-type: none"> <li>• a description of how the QoS Monitor will be designed and operated, and</li> <li>• the quality controls to be applied in the QoS Monitor</li> </ul> <p>Before commencing the QoS Monitor, the QoS Monitor Operator shall provide a copy of the final draft version of the Operator Manual<sup>24</sup> to the QoS Monitor Auditor<sup>25</sup>.</p> <p>The QoS Monitor Auditor shall then have two weeks in which to provide any comments on the final draft version of the Operator Manual which, in the opinion of the QoS Monitor Auditor, are material. The QoS Monitor Operator shall take account of any such comments, prior to finalising the Operator Manual.</p> <p>The QoS Monitor Operator will maintain a "Quality Control Log" which will be a record of all of the quality controls as described in the relevant CEN technical standard and in the Operator Manual. The QoS Monitor Operator will make its Quality Control Log and its Operator Manual available to the QoS Monitor Auditor.</p>
<b>C.1.1 Statistical design</b>	The QoS Monitor Operator, as part of designing and operating the QoS Monitor, will produce a Statistical Design document which will include the following information:

<sup>23</sup> This date will be normally on or about 21<sup>st</sup> of February of each monitoring year.

<sup>24</sup> For monitoring of postal packets performance.

<sup>25</sup> In accordance with Annex C of I.S. E.N. 13850:2020

	<ul style="list-style-type: none"> <li>• Sample design</li> <li>• Real Mail Studies up-to-date information (or alternative data)</li> <li>• Calculation Rule (Annex B.2.1)</li> <li>• Non-working days</li> <li>• Postal areas</li> <li>• Panel size</li> <li>• Aimed for accuracy</li> <li>• Weighting methodology</li> </ul>
<b>C.1.2 Test item production</b>	The QoS Monitor Operator shall ensure that the correct postage amount is applied on all mail test items used in the QoS Monitor.
<b>C.1.3 Provision of test items to the sender panellists</b>	The integrity of the QoS Monitor shall not be compromised in any way. To ensure that the identities of panellists in the QoS Monitor are not compromised, panellists' packs will be distributed on a fortnightly basis by the QoS Monitor Operator.
<b>C.1.8 Archiving</b>	Mail test item data will be archived by the Monitor Operator for 6 months following the completion of each audit of the QoS Monitor. If the QoS Monitor Auditor has an issue regarding any of the mail test item data, the mail test item data will be retained for 6 months by the Monitor Operator following completion of any corrective actions / final audit. If, after this period, the QoS Monitor Auditor's issue remains unresolved, the mail test item data will be retained by the Monitor Operator until such time as the issue has been resolved.
<b>H.2.3 Induction and delivery</b>  <b>H.2.3.1 Induction and last collection</b>	<p>On recruitment by the QoS Monitor Operator, all sender panellists in the QoS Monitor shall identify the particular induction point, or points, at which they will normally induct their test mail items, to include the type of induction point and its location. Sender panellists shall also inform the QoS Monitor Operator of the advertised LTOP at each identified induction point. The QoS Monitor Operator shall verify the information provided by panellists against the information provided by the DUPSP.</p> <p>When inducting test mail items, panellists shall record on their sender reporting documents whether there are any changes to the induction point information as originally provided to the QoS Monitor Operator (for example, if they have posted at a different induction point or if the LTOP at their usual induction point has changed).</p> <p>On a quarterly basis, the DUPSP will supply ComReg with its induction point<sup>26</sup> and Latest Time of Posting database. the DUPSP will also include with this its list of business customers with meter mail licences and those using its business collections service.</p> <p>ComReg will provide this information to the QoS Monitor Operator who will use it for cross-checking against panellist information. The QoS Monitor Operator</p>

<sup>26</sup> The list of universal postal service access points where the public can post universal postal service mail (for example public post-boxes), including the times for each point by which a person can post to have mail delivered on the next working day. [Access to the universal postal service was set out in ComReg Document 03/50 - Direction D11/03] [Also see Footnote 5 on Page 2.]

	<p>will be subject to a non-disclosure agreement in respect of this information. In addition, and on an ongoing basis, the DUPSP will immediately advise ComReg of any issues with regard to its collection point network (including, for example, temporary inaccessibility to posting point due to damage to a postbox, postbox closure due to national security issues, Post Office closures, and ceased customers).</p> <p>The DUPSP will also provide access to its Collections Scanning system<sup>27</sup> information to ComReg. ComReg will provide this to the QoS Monitor Operator but for information purposes only. The QoS Monitor Operator will be subject to a non-disclosure agreement in respect of this information.</p>
<p><b>H.2.3.2 Delivery and correct addressing</b></p>	<p><b>Test Mail Item Addressing</b></p> <p>The national postcode system called ‘Eircode’ was introduced in Ireland in July 2015. All test mail items in the QoS Monitor shall now bear the correct postcode and the correct postal address which is contained in the ‘Eircode’ database of postal addresses. The Preferred Tenderer will be required to procure access to the Eircode database and to ensure that the most recent version of this database is used for all address validations that are performed. The Auditor will make a statement in the annual Audit Report confirming that this has taken place.</p> <p>If the designation of the universal postal service provider changes ComReg will make any necessary changes to this section and advise the key stakeholders.</p> <p><b>Delivery:</b></p> <p>For the purposes of the QoS Monitor only:</p> <ul style="list-style-type: none"> <li>• Panellists must have a secure individual letterbox at their delivery point which is publicly accessible between 7am and 5.30pm on every working day.</li> <li>• Panellists shall not have a shared delivery point with other households or businesses; and</li> <li>• Addressees at mobile homes, caravans, and canal boats are excluded.</li> </ul> <p>This does not relieve the DUPSP with regard to its legal obligations to deliver postal packets to any of the above.</p>
<p><b>H.3 Validation and transit time calculation</b></p> <p><b>H.3.1.3 Panellist based validation &amp; (C.1.4 &amp;</b></p>	<p><b>Panellist Performance Review criteria:</b></p> <p>For three consecutive weeks following the initial recruitment of a new panellist to the QoS Monitor, that panellist’s test mail items shall not form part of the</p>

<sup>27</sup> System used by the DUPSP to indicate clearance/collection of mail of universal postal service access points (for example public post-boxes)



<p><b>C.1.5) Sender / Receiver Test items</b></p>	<p>Monitor. Any performance issues identified by the QoS Monitor Operator, within that three-week period, shall be promptly addressed in an appropriate manner.</p> <p>The QoS Monitor Operator will check the performance of panellists in the QoS Monitor, in accordance with the predefined rules and procedures established by the QoS Monitor Operator in its Operator Manual.</p> <p>This panellist monitoring should take the panellist as a whole into account, using all information available to the QoS Monitor Operator about the panellist (for example ‘reply rates for reporting information’, ‘validity of their reporting information’ etc.) during the period of time in question.</p> <p>The management of panellists will be a key selection criterion in selecting the QoS Monitor Operator.</p> <p>If the QoS Monitor Operator finds that any panellist is not performing to the required standard, the QoS Monitor Operator may require the panellist to retrain and thereafter the panellist’s performance will be monitored for a further defined period. Data related to the panellist’s test mail items will continue to form part of the QoS Monitor, unless there are justifiable reasons for excluding all or part of that data.</p> <p>If an investigation by the QoS Monitor Operator should confirm that a panellist has missed a few short periods of sending or receiving test items, but no invalid data in respect of that panellist is found to exist, then the panellist and all data relating to the panellist will be retained in the QoS Monitor but the panellist will be retrained and kept under review for a defined period, following retraining.</p> <p>If an investigation by the QoS Monitor Operator should confirm that data relating to panellist is invalid and if there is no subsequent improvement in that panellist’s performance, following retraining, then the panellist shall be removed from the QoS Monitor panel and all data for that panellist will be excluded from the annual result of the QoS Monitor, for the relevant year.<sup>28</sup></p> <p>In reviewing a panellist’s performance, contact with the panellist shall be kept to the minimum necessary.</p> <p>Every six months, the QoS Monitor Operator will review the on-time performance reported for each panellist, for the six-month period immediately preceding the review. For the relevant six-month period:</p> <ul style="list-style-type: none"> <li>• every panellist whose average on-time performance is 10% or more below the overall on-time performance result will be subject to further investigation; and</li> <li>• every panellist whose average on-time performance is greater than 98%, above the overall on-time performance result, will be subject to further investigation.</li> </ul>
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<sup>28</sup> Data for these panellists will not be retrospectively removed from the previous ‘monthly reports’ provided to the DUPSP in that year.

	<p>The QoS Monitor Operator will contact the panellist to investigate potential reasons for the performance result. Panellists' results shall be accepted unless the QoS Monitor Operator has justifiable reasons for excluding those results, such as consistent panellist error or the panellist having likely been identified by the DUPSP staff. If investigations confirm consistent panellist error or panellist identification, all results for that panellist will be excluded from the annual result of the QoS Monitor, for the year in question.</p> <p>All panellist correspondence and the QoS Monitor Operator's decisions in respect of panellists shall be documented and shall be made available for the QoS Monitor Auditor to review. This will be included in the Quality Log as outlined at C.1 of this document.</p>
<b>H.3.2 Service standard</b>	The applicable regulatory service standards are 94% for J+1 and 99.5% for J+3, as per ComReg Direction 15/126, which may be amended from time to time by ComReg.
<b>H.3.3.1 General</b>	Cross refer to 5.2.3
<b>H3.4 Loss</b>	J+30 will be excluded

## ANNEX 2.

### QoS Monitor Auditor Handbook

<b>Reference to section or paragraph in I.S. EN 13850:2020: Postal Services - Quality of Services - Measurement of the transit time of end-to-end services for single piece priority mail and first class mail</b>	<b>Implementation of I.S EN 13850:2020 in the Irish context</b>
<b>0 Introduction</b> <b>0.1 General</b>	<p>This document shall be called the “QoS Monitor Auditor Handbook”.</p> <p>The purpose of the QoS Monitor Auditor Handbook is to provide enhanced information<sup>29</sup> on the specifications contained in I.S EN 13850:2020, as required, to assist the QoS Monitor Auditor to audit the QoS Monitor as operated by the QoS Monitor Operator for measuring the performance quality of the universal postal service provided by the DUPSP, against the QoS performance standard set by ComReg.</p> <p>The QoS Monitor Auditor shall audit the QoS Monitor in accordance with the Communications Regulation (Postal Services) Act 2011 (“Act of 2011”) and current issue of I.S EN 13850:2020 and in accordance with the QoS Monitor Auditor Handbook.</p>
<b>Scope</b>	Compliance assessment of the QoS Monitor with the relevant requirements of the CEN technical standard I.S EN 13850:2020 and in accordance with the Monitor Handbook, including recommending corrective actions to ensure compliance.
<b>H.6 Audit</b> <b>H.6.2 Position of the auditor</b>	A non-disclosure agreement will be included in the contract between the QoS Monitor Auditor and ComReg with regard to the protection of the integrity of the QoS Monitor, which will confirm that all panellist identity information provided by the QoS Monitor Operator to the QoS Monitor Auditor, and particularly all information relating to panellists’ names, addresses and identification numbers, will not be disclosed, directly or indirectly, to any other party.
<b>H.6.3 Audit report</b>	In accordance with I.S EN 13850:2020, the QoS Monitor Auditor shall only provide the final version of its annual audit report to ComReg and the DUPSP, in confidential and non-confidential versions, as required. Draft versions of audit reports will be confidential to the QoS Monitor Auditor and the QoS Monitor Operator only.

<sup>29</sup> Please see Footnote 12 on Page 3.

	<p>ComReg shall publish the final version of the QoS Monitor Auditor’s annual audit report (the Audit Report conclusions) along with the corresponding annual report of the QoS Monitor, containing the audited annual results of the QoS Monitor.</p> <p>The QoS Monitor Auditor’s final annual audit report shall include: details of any instances of material non-compliance with I.S EN 13850:2020 and/or any errors which had a material impact on the annual result of the QoS Monitor; the corrective actions applied by the QoS Monitor Operator in respect of same, and the final audit of such corrective actions made by the QoS Monitor Auditor.</p>
<p><b>Annex C Quality Control &amp; Auditing</b></p> <p><b>C.1 Quality Control</b></p>	<p>Before commencing the QoS Monitor, the QoS Monitor Operator shall provide a copy of the final draft version of the Operator Manual to the QoS Monitor Auditor. The QoS Monitor Auditor shall then have two weeks in which to provide any comments on the final draft version of the Operator Manual which, in the opinion of the QoS Monitor Auditor, are material. The QoS Monitor Operator shall take account of any such comments, prior to finalising the Operator Manual.</p>
<p><b>H.6.5 Frequency of audit</b></p>	<p>The QoS Monitor Auditor shall conduct its annual audit immediately after the annual results of the QoS Monitor have been prepared by the QoS Monitor Operator.</p> <p>Two weeks after the passing of the J+30 timeline<sup>30</sup> (See H 3.4 in QoS Monitor Operator Handbook above) the QoS Monitor Auditor will provide its ‘Audit Documentation Request’ listing to the QoS Monitor Operator. The listing will be in order of priority meaning that the documentation that is needed at the commencement of the audit process will be listed first, followed by the remaining Requests.</p> <p>Three weeks after the passing of the J+30 timeline the QoS Monitor Operator and the QoS Monitor Auditor shall meet to agree the dates for the data transfer as listed in the Documentation Requests, based on the priority Audit Documentation Requests being provided first. This will allow the Audit work processes to commence. The QoS Monitor Auditor, having received the relevant Documentation Request information from the QoS Monitor Operator, will complete its audit not later than six weeks following provision of the information.</p> <p>These dates will inform the QoS Monitor Auditor’s audit timetable (for the provision of the Audit Report) to be provided by the QoS Monitor Auditor to ComReg.</p> <p>ComReg will publish the audited annual result of the QoS Monitor, except where the QoS Monitor Auditor has determined that there was material non-</p>

<sup>30</sup> This date will be normally on or about 15<sup>th</sup> February of each monitoring year.

	<p>compliance with I.S. EN 13850:2020 or that errors occurred in the QoS Monitor which had a material impact on the annual result.</p> <p>The annual audit of the QoS monitor by the QoS Monitor Auditor will include an interim step at the end of the first six-month period, when the QoS Monitor Auditor will review the operation of the QoS Monitor's systems and controls only. If the QoS Monitor Auditor should, at that stage, discover any instances of material non-compliance with I.S. EN 13850:2020, or any errors which could have a material impact on the annual result, these will be resolved between the QoS Monitor Auditor and the QoS Monitor Operator. Prior to commencement of the annual audit, the QoS Monitor Auditor may confirm that any remedial/corrective actions identified at the interim six-month audit step, have been actioned in accordance with I.S. EN 13850:2020. In the end-of-year annual audit, the QoS Monitor Auditor may confirm that any remedial / corrective actions, required following the interim six-month audit step, were properly applied by the QoS Monitor Operator, in accordance with I.S. EN 13850:2020.</p> <p>If any material non-compliance with I.S. EN 13850:2020, or any errors which could have a material impact on the annual result of the QoS Monitor, are found to have occurred, corrective actions will be applied by the QoS Monitor Operator within four weeks, where possible, in accordance with the QoS Monitor Auditor's recommendations.</p> <p>The QoS Monitor Auditor shall then complete its final annual audit within one further week, following which the final, audited annual result of the QoS Monitor will be published by ComReg.</p>
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## ANNEX 3.

### RMS Auditor Handbook

<p><b>Reference to section or paragraph in I.S. EN 13850:2020: <i>Postal Services - Quality of Services - Measurement of the transit time of end-to-end services for single piece priority mail and first class mail</i></b></p>	<p><b>Implementation of I.S. EN 13850:2020 in the Irish context</b></p>
<p><b>0 Introduction</b></p> <p><b>0.1 General</b></p>	<p>This document shall be called the “RMS Auditor Handbook”.</p> <p>The purpose of the RMS Auditor Handbook is to provide enhanced information on the Real Mail Study audit information contained in I.S. EN 13850:2020, as required.</p> <p>The “RMS Auditor” shall audit the Real Mail Study in accordance with the Communications Regulation (Postal Services) Act 2011 (“Act of 2011”) and I.S. EN 13850:2020 and in accordance with the RMS Auditor Handbook.</p> <p>This enhanced information shall assist the RMS Auditor in conducting an audit of any Real Mail Study and producing an annual report in respect of same which, amongst other things, shall confirm whether the Real Mail Study was conducted in accordance with the Act of 2011 and I.S. EN 13850:2020 and, if necessary, shall identify any remedial or corrective actions which ought to be taken.</p> <p>The RMS Auditor may also be required to audit alternative data as the basis of the monitor design, in accordance with I.S. EN 13850:2020.</p>
<p><b>Scope</b></p>	<p>Compliance assessment of the Real Mail Study against relevant requirements of I.S. EN 13850:2020, including recommending corrective actions to ensure compliance.</p>
<p><b>H.6 Audit</b></p> <p><b>H.6.2 Position of the auditor</b></p>	<p>A non-disclosure agreement (NDA) will be included in the contract between the RMS Auditor and ComReg which will confirm that all information provided by the DUPSP or ComReg, to the RMS Auditor, will not be disclosed, directly or indirectly, to any other party.</p>
<p><b>H.6.3 Audit report</b></p>	<p>The annual report of the RMS Auditor shall include details of any instances of material non-compliance with I.S. EN 13850:2020 or errors that could have a material impact on the RMS and, as a consequence, on the annual result of the QoS Monitor. The annual report shall also specify any corrective</p>

	<p>actions which the RMS Auditor requires to be taken by the DUPSP, in respect of such non-compliance or errors, and it shall also include the final audit of those corrective actions.</p> <p>The annual report of the RMS Auditor shall be completed, in accordance with I.S. EN 13850:2020, by the end of April in each year and then sent to ComReg. Following completion of the Audit the RMS data will be provided to the QoS Monitor Operator as soon as possible thereafter, for implementation in the QoS Monitor in time for the next 12-month measurement period.</p>
<p><b>H.6.5 Frequency of audit</b></p>	<p>There will be an annual audit by the RMS Auditor of the continuous Real Mail Study provided by the DUPSP.</p> <p>If the RMS Auditor should determine that there are material inaccuracies with the DUPSPs real mail flows, or that the DUPSPs Real Mail Study does not otherwise materially comply with I.S. EN 13850:2020, the RMS Auditor shall advise on the remedial/corrective actions to be applied. These actions shall be applied by the DUPSP within four weeks, where possible, in accordance with the RMS Auditor’s recommendations. Where remedial/corrective actions cannot be retrospectively applied, these will instead be put in place immediately in the current Real Mail Study being conducted by the DUPSP.</p> <p>The final audit of the RMS Auditor will be completed within a further week, following which the final report of the RMS Auditor will be sent to ComReg and the DUPSP.</p> <p>In addition to the annual audit of the DUPSPs Real Mail Study, the RMS Auditor may also review the operation of the DUPSPs Real Mail Study on a six-monthly basis, to ensure it is being carried out in accordance with CEN 13850.</p>

## ANNEX 4.

### Discriminant Mail Characteristics (DMC)

<b>Routes</b>	
	Dublin to Dublin
	Dublin to Provinces
	Provinces to Dublin
	Provinces to Provinces
	Local
<b>Urban/Rural</b>	
	Urban to Urban
	Urban to Rural
	Rural to Urban
	Rural to Rural
<b>Days of Induction</b>	
	Monday
	Tuesday
	Wednesday
	Thursday
	Friday
<b>Induction Method</b>	
	Mail Box
	Pick up
	PO (Counter)



	Metered Mail Box
	DSU
<b>Payment Method</b>	
	Stamped
	Metered
	Counter Automation
<b>Address Method</b>	
	Machine
	Hand
<b>Receiver Type</b>	
	Business Receiver
	Private Receiver
<b>Sender Type</b>	
	Business Sender
	Private Sender
<b>Colour</b>	
	Brown
	White
	Other
<b>Size</b>	

	A4
	C5
	C6/DL
	Pckt
<b>Format</b>	
	Non-Window
	Window
<b>Weight</b>	
	0-20g
	21-50g
	51-100g
	101g+

## ANNEX 5

### Geographical Stratification

Dublin Urban – Dublin Urban

Dublin Urban – Dublin Rural

Dublin Rural – Dublin Urban

Dublin Rural – Dublin Rural

Dublin Urban – Province Urban

Dublin Urban – Province Rural

Dublin Rural – Province Urban

Dublin Rural – Province Rural

Province Urban – Province Urban

Province Urban – Province Rural

Province Rural – Province Urban

Province Rural – Province Rural

Province Urban – Dublin Urban

Province Urban – Dublin Rural

Province Rural – Dublin Urban

Province Rural – Dublin Rural

## ANNEX 6

### Reporting Information to be provided

The reports will show the following results information:

A. D+1 and D+3 results will be presented as per the table below

<b>POSTING (RoI)</b>	<b>DELIVERY (RoI)</b>			
		<b>To Anywhere</b>	<b>To Local (Delivery within county of posting)</b>	<b>To Dublin County</b>
	<b>From Anywhere</b>	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)
	<b>From Dublin County</b>	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)
	<b>From Outside Dublin County</b>	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)	<b>XX%</b> (+/- %)

B. Result trend lines for the following mail characteristics:

- Mail Format - POP<sup>31</sup> Letters, Flats, Packets,
- Payment Method – franked or stamped
- Address Method – handwritten or typed
- Induction Method – Post Office, Post Box, Collection from Business, Meter Mail Box, DSU, (These will only be reported on if base size is of sufficient size).

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<sup>31</sup> POP: Letters and postcards must be: No larger than C5 in size or half the size of an A4 sheet, also known as POP or Post Office Preferred / Minimum 140mm long x 90mm wide x 0.18mm deep / Maximum 235mm long x 162mm wide x 7mm deep

**Definitions for induction Methods (for QoS monitoring purposes only):**

Post Office:

Posted within the confines of the office e.g. Over the counter, internal aperture or external aperture which is cleared from within the office. The access specification for all products (Letters, Flats, Packets, Parcels) for each post office will be clearly outlined in the Access Points database to be reported by the DUPSP to ComReg and which will be provided to the QoS Monitor Operator.

Post Box:

Collections from Post Boxes on street and boxes that are freestanding outside of Post Offices.

Collection from Business:

Collection from a company at their premises and from the agreed designated collection point.

Meter Mail Box:

Meter Mail collections from Meter Mail Boxes on street and Meter Mail Boxes that are freestanding outside of Post Offices.

DSU :

- DSU: Mail posted at a DSU