



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

# Postal Strategy Statement 2024 - 2026



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# 1.

## Introduction

ComReg is the regulator of postal services and the universal postal service in Ireland. Our mandate comes from a European Directive transposed into Irish law.

This Postal Strategy Statement details ComReg's vision, mission, and values together with our strategic goals and objectives for postal regulation over the two-year period, 2024 to 2026. A separate annual action plan will detail the work that we will do to meet these strategic goals and objectives.

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### **In this Postal Strategy Statement, we set out:**

- Our purpose
  - Our vision, role, mission and values
  - Our strategy
  - How we monitor and report our progress
  - How we developed our strategy
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# 2.

## Our purpose



The last few years have shown that postal services are essential; letters and parcel deliveries remain important to postal service users' daily lives. The postal services sector is fully open to competition and there are a number of postal service providers.

Though the postal sector is fully open to competition, there is a legal mandate for what is called a universal postal service as the market is not effectively competitive.

## Our purpose is to regulate:

1 Universal postal service

2 Postal services

### Universal postal service

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The universal postal service is a safeguard to ensure all in Ireland can get and send post nationwide. The universal postal service means at least one collection and one delivery to all, on every working day (Monday to Friday). The most popular universal postal service is letters for delivery within Ireland. Our purpose includes ensuring the provision of a universal postal service to all nationwide on every working day, at an affordable price, and to a sufficient level of quality.

In 2023, An Post asked to continue as the universal service provider and, following consultation, is now the universal postal service provider until 1 August 2029, unless otherwise amended by ComReg. Given the importance of the universal postal service, law requires that the universal postal service provider is subject to more regulation on the universal postal service only.

## Postal services

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Anyone can set up a postal business. Anyone providing or intending to provide a postal service must first tell ComReg, after which they will be an authorised postal service provider, subject to certain requirements. All postal service providers have to do is to implement and publish a code of practice covering customer complaints and redress. Our purpose for postal services is limited to ensuring this. We also have a related consumer dispute resolution role for both senders and receivers of post. We have no other role for any postal services provided by any postal service provider, including An Post. All postal service providers, including An Post, are free to launch any postal service after first notifying ComReg.

There are currently 13 postal service providers notified to ComReg:

1. An Post
2. Budget Parcel
3. Corrigan Business Services
4. DCK / DC Kavanagh
5. DX Ireland
6. Fastway Couriers (Ireland)
7. General Logistics Systems (GLS) Ireland
8. Hitch Delivery
9. Lettershop Postal
10. Mail Metrics
11. Parcel-King
12. Sooner Than Later Solutions Ltd.
13. Tico Mail Works

# 3.

## Our vision, role, mission and values

Our vision, role, mission and values underpin how we act.

ComReg's vision, role, mission and values apply to the entire communications sector we regulate, including postal services.

### Our Vision

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Consumers and businesses in Ireland have affordable, high-quality, and widespread access to secure communications services and applications that support their social and economic needs.

### Our Role

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Our role is to ensure that communications markets operate in the interests of end-users and society.

### Our Mission

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Our mission is that through effective and relevant regulation, we facilitate the development of a competitive communications sector in Ireland that attracts investment, encourages innovation, and empowers consumers to choose and use communications services with confidence.

### Our Values

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- Integrity
- Impartiality
- Effectiveness
- Excellence
- Transparency



# 4.

## Our strategy

Our vision, role, mission, and values together with our mandate, have informed our strategy of three strategic goals and two strategic objectives for each of those goals:

1	<b>Goal 1:</b> Ensure a universal postal service	<b>Objective 1:</b> Assess the reasonable needs of postal service users <b>Objective 2:</b> Monitor compliance with universal postal service requirements
2	<b>Goal 2:</b> Promote and protect the interests of postal service users	<b>Objective 3:</b> Empower postal service users by ensuring the availability of accurate and appropriate information <b>Objective 4:</b> Protect postal service users by ensuring the availability of complaints and redress procedures
3	<b>Goal 3:</b> Promote the development of the postal sector	<b>Objective 5:</b> Promote the development of the postal sector by providing research, data, and information <b>Objective 6:</b> Facilitate the development of the postal sector by delivering our legal mandate

## GOAL 1: Ensure a universal postal service

We have a statutory function to ensure the provision of a universal postal service that meets the reasonable needs of postal service users. We also have a statutory objective to promote 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.

Therefore, our goal is to ensure a universal postal service and our ambition is:

**Ambition: There is an affordable high-quality universal postal service that meets the reasonable needs of postal service users.**

To aim to achieve this goal and ambition, our objectives are:

### **Objective 1: Assess the reasonable needs of postal service users**

We will continue to assess the reasonable needs of postal service users and what this could mean for the universal postal service. We will do this by engagement with stakeholders, public consultations, and research. We will also continue to engage with other European postal regulators on the review of the European regulatory framework and what this could mean for the universal postal service.

### **Objective 2: Monitor compliance with universal postal service requirements**

We are required to monitor the universal postal service provision as follows:

#### **Delivery every working day**

It is a legal requirement that the universal postal service provider delivers the universal postal service every working day (Monday to Friday) to the home or premises of every person in the State. We will continue to monitor the universal postal service provider compliance, either in response to complaints or following our own investigations.

#### **Next day delivery quality of service performance**

For single piece universal postal service, postal service users are paying for a nationwide next day delivery. It is a legal requirement that we monitor whether users are receiving this service. We currently monitor universal postal service letters and packets.

We will continue to engage with the universal postal service provider on its quality of service performance. Where required, we can give a direction to the universal postal service provider to take corrective action.

Given the increased importance of universal postal service parcels, we will consider whether to also monitor the quality of service performance of universal postal service parcels.

## **Pricing**

We are tasked to ensure that the universal postal service provider's pricing of universal postal services comply with certain requirements set by law. These requirements include that prices are affordable and reflect the cost of providing the individual service.

However, ComReg has no price approval role. We cannot intervene before the price changes are made by the universal postal service provider.

If changes to universal postal service prices do not comply with the requirements, we can only act after the price changes are made. We will continue to monitor this by reference to the regulatory accounts and other information.

## **Regulatory accounts**

Regulatory accounts are critical information for ComReg to monitor:

- volume, revenue, and costs of the universal postal services
- prices reflect the individual costs of the universal postal services
- other regulatory requirements.

We are the sole user of the regulatory accounts. The universal postal service provider prepares and presents the regulatory accounts according to rules set by us. For example, ComReg rules require accurate cost allocations between letters and parcels. We will continue to monitor compliance by the universal postal service provider.



## GOAL 2: Promote and protect the interests of postal service users

We have a statutory objective to promote the interests of postal service users and to ensure a high level of protection for postal service users.

Promoting and protecting the interests of postal service users means ensuring postal service users know:

- the postal service they are buying
- how to raise a complaint if problems arise
- the steps that can be taken if the complaint remains unresolved.

Therefore, our goal is to promote and protect the interests of postal service users and our ambition is:

**Ambition: Postal service users can choose and use postal services with confidence.**

To achieve this goal and ambition, our objectives are:

### **Objective 3: Empower postal service users by ensuring the availability of accurate and appropriate information**

We recognise that postal service users must be adequately informed. We engage with postal service providers to help ensure that appropriate information is made available to postal service users. We also provide advice to postal service users on our website.

There are more information requirements for the universal postal service. To empower and inform users of the universal postal service, we:

- ensure that the terms and conditions for the universal postal services contain the appropriate information to meet the reasonable needs of postal service users
- publish the annual quality service performance results of the universal postal service provider against the regulatory standards. An Post must also publish these performance results on its website.

### **Objective 4: Protect postal service users by ensuring the availability of complaints and redress procedures**

Every postal service provider must have, publish, and implement a code of practice. This code of practice sets out procedures, standards, and policies for handling of complaints from postal service users.

We will continue to ensure that the codes of practice have the required information and are published and implemented. All codes of practice must have procedures for resolving disputes. If postal service users are not satisfied:

- with all the steps taken by the postal service provider to resolve their complaint
  - with the result of the independent assessment of the complaint
- they can ask ComReg to help resolve the dispute and we will continue to do this.

## Goal 3: Promote the development of the postal sector

We have a statutory objective to:

- promote the development of the postal sector
- facilitate the development of competition and innovation in postal service provision by ensuring that postal service users derive maximum benefit in terms of choice, price, and quality.

We believe that well-functioning markets deliver best outcomes in terms of prices, quality, choice, and innovation.

Therefore, our goal is to promote the development of the postal sector and our ambition is:

**Ambition: A postal sector that delivers high quality services, innovation, and choice.**

To aim to achieve this goal and ambition, our objectives are:

### **Objective 5: Promote the development of the postal sector by providing research, data, and information**

It is important that there is data and information about the postal sector. This is key to ensure that:

- all understand the changes facing the sector
- we can properly perform our role
- we can share information with all, including the European Commission and European Regulators Group for Postal Services.

Therefore, we will continue to:

- commission and publish research on the postal sector, including users' needs and users' experiences of post. We consider actions in light of research.
- gather and collate postal data and statistics for the European Commission and European Regulators Group for Postal Services. This data, where not confidential, is published. For example, we will continue to publish our parcel report of the aggregate parcel data for Ireland collected under the European Cross Border Parcel Regulation.



### **Objective 6: Facilitate the development of the postal sector by delivering our legal mandate**

To develop a competitive and sustainable postal services sector, it is important that all postal service providers can compete on a fair basis. This helps to ensure that postal service users derive maximum benefits in terms of choice, price, and quality.

We help this by acting in accordance with our mandate. Where necessary, this includes:

- aiding the Competition and Consumer Protection Commission where competition law issues arise, as we do not have competition law powers in the postal sector
- resolving any disputes on access to the postal network of the universal postal service provider
- allowing access to postal infrastructure of the universal postal service provider.

To develop a competitive and sustainable postal services sector, regulatory certainty is also required. When making regulations, we will continue to provide regulatory certainty by consulting on our proposals, and by providing the timeframe for our proposed actions in our annual action plan.

Our mandate comes from a European regulatory framework. The European Commission is currently preparing a study to assess possible evolutions of the postal sector and possible changes to this regulatory framework. It is planned that the study will be complete by end 2024. We will therefore continue to engage with the European Regulators Group for Postal Services on this and what it could mean for postal regulation.

As to environmental sustainability of postal services, we can only act within our mandate. We do not have express powers in respect of environmental sustainability and climate change associated with postal services. However, we note the Climate Action and Low Carbon Development (Amendment) Act 2021 and as required, in so far as practicable, we will discharge our existing functions consistent with the requirements included in that Act.

# 5.

## How we monitor and report our progress

Our strategy will inform our annual action plans for 2024-2026 which detail the planned outputs for postal regulation for the year with a target delivery quarter. We monitor our progress against those annual actions plans and we will continue to publish quarterly updates of our progress.

We will also continue to publish our progress in our Annual Report.



# 6.

## How we developed our strategy

In developing our strategy, we took account of our mandate, engaged with stakeholders, and considered the strategic context as follows:

### Our mandate

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We regulate postal services and the universal postal service in accordance with law, the Communications Regulation (Postal Services) Act 2011 as amended, which transposes the European Postal Services Directive.

#### **Our statutory functions are to ensure:**

- the provision of a universal postal service that meets the reasonable needs of postal service users
- compliance by postal service providers with the obligations imposed on them.

#### **Our statutory objectives are 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 users
- promote the interests of postal service users
- facilitate the development of competition and innovation in the market for postal service provision.

Our strategy reflects this mandate, and we act in accordance with this mandate.

#### **ComReg has no mandate for the following:**

- courier and express operators
- non-postal services provided by postal service providers
- post offices
- competition law in the postal sector
- general consumer rights in the postal sector
- customs duties on postal items
- Eircode.

### Engagement with stakeholders

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We engaged with our external stakeholders through a public consultation process on our proposed strategy, which was available on our website.

## Strategic context

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In setting our strategy, we considered the following context facing the postal sector:

### 1. Continued decline in letter post volume

Most letter post is sent by a few key users (banks, utilities, government) and is mostly delivered by An Post. Competition for physical letter delivery is still relatively limited and physical letters continue to be replaced by electronic communications such as email, online accounts. This creates opportunities and challenges for postal service providers.

An Post has largely increased its prices to recover the lost revenue from fewer letters being sent; for example, the stamped letter has increased in price by 88% (February 2017 to February 2023). Other options include changing postal services and postal network operations, with the aim for financially and environmentally sustainable delivery of letters.

### 2. Growth and competition in the parcel sector

Online shopping is increasing the demand for parcels. Most parcels are sent by large e-commerce companies.

There are many parcel delivery operators, with strong competition on price, reliability, and speed of delivery. Many parcel delivery operators are not postal service providers and therefore are not subject to regulation by ComReg. However, there are typically strong contractual protections for users receiving these parcels.

Increase in parcel deliveries has an impact on environmental sustainability goals; for example, carbon emissions and circular economy considerations. This creates opportunities and challenges for parcel delivery operators. Parcel delivery operators are already acting and seeking further ways to achieve environmental sustainability goals.

### 3. Users' needs

Postal services are essential; letters and parcel deliveries are still important to users' daily lives. Though there is a changing context for the postal sector, users' needs remain relatively unchanged. We regularly commission surveys on postal users' needs to inform us. The latest survey on postal users was conducted in August 2023 and updates an earlier survey conducted in May 2021. This latest 2023 survey of a representative sample of adults in Ireland (note this research did not survey businesses; businesses are significant users of post) has found that post still is important to users as:

- Over 3 in 4 claim daily delivery of letters and parcels is important to them.
- 3 in 4 claim next day delivery of letters is important to them.
- 4 in 5 claim next day delivery of parcels is important to them, this is an increase since the last survey. There is a notable increase in those claiming next day delivery of parcel post is very important, up from 1 in 4 to 1 in 3.
- 2 in 5 value next day delivery of letters as their reasonable need; however, just as many note that 2 day delivery is suitable. The preference for next day delivery of letters has increased since the last survey.
- 9 in 10 feel the price of letters and parcels needs to be kept affordable, same as last survey.





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