



Office of the Director of
**Telecommunications
Regulation**

Regulation of Postal Services - Quality of Service Standards to be achieved by An Post.

Consultation Paper

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Foreword by Director

In February I published an Information paper [ODTR 01/09] about postal regulation and the consultation procedures I have put in place. This paper is one of three papers I am publishing to ascertain the views of interested parties about the key issues that will form the framework for postal regulation in Ireland, where a central role of the regulator is to require the achievement of standards of delivery of service as if the service was provided on a competitive basis.

Quality of Service performance for postal services has been a major issue for many years. Efficient and cost effective services are an essential element of the infrastructure needed by businesses and individual citizens. The targets set for An Post in terms of the percentage of letters to be delivered the next working day after they are posted must reflect what the customers want and what An Post can achieve by focussing its efforts on meeting the ever rising customer requirements in a rapidly growing economy in a competitive international environment.

I look forward to the responses to this consultation so that the quality of service targets can be calibrated correctly to what customers want and in full understanding of the technical and financial issues involved.

Etain Doyle,
Director of Telecommunications Regulation.
30 April 2001

1. Introduction

The EU “Postal Directive”¹ establishes a harmonised regulatory framework for postal services throughout the European Union and for securing improvements in the Quality of Service provided, and defines a decision-making process regarding further opening of the postal market to competition. It was transposed into national law last September by the European Communities (Postal Services) Regulations 2000 (SI No.310/2000 "the Regulations"). Under these Regulations the Director has been given responsibility for regulation of the postal sector.

Under Regulations 13 & 14 the Director is required to set and publish quality of service standards in relation to the universal service, paying attention in particular to routing times and to the regularity and reliability of services, in order to achieve the improvement of quality of service required by the EU Postal Directive.

In carrying out her functions under the Regulations, the Director is obliged to take into account the views of interested parties. Information Notice ODTR 01/09 sets out her procedure for taking these views into account.

The Director is now undertaking a consultation specifically on the Quality of Service standards to be set for next day delivery of internal letter mail. These standards are required by the Regulations to be compatible with those set out in the Postal Directive for intra-Community cross-border mail. There are a substantial number of other Quality issues which will be addressed in two papers² scheduled for later this year.

The Director would welcome comments from interested parties in relation to any of the questions raised in this consultation paper. The closing date for receipt of comments is Friday 1st June 2001. Please see section 8 for details about submitting comments on this paper.

2. Background

2.1. The need for improvement in quality of service

2.1.1. National Letter Mail Services

The service expected from An Post has been conditioned by levels of service provided in the past when labour was plentiful and other means of communication were not available. Thus within a city such as Dublin or Cork it was not uncommon to post a letter and expect to receive the reply the same day.

However, today the general expectation of postal customers within the country is to post a letter one day and expect delivery the next working day, providing that the mail has been posted by close of business. This is not to say that it is essential that all mail should be

¹ Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service. OJ L 15 21.1.1998, p. 14

² ‘Definition of Universal Postal Service Requirements’ and ‘Information to be provided by Universal Service Providers’

delivered by the next working day, but that a regular and reliable next day service should be available to those customers who need it.

Statistics published in An Post's Annual Reports show that for the last three years An Post has failed to deliver one letter in eight the next day – see summary at Table 1. This is an average figure and is higher at certain times of the year, eg Christmas.

Table 1 - An historical view of An Post's Quality-of-Service performance³

Year	Dub to Dub	Dub to Prov	Prov to Dub	Prov to Prov	Overall QoS
1993	96%	90%	93%	96%	94%
1994	88%	84% ⁴	88% ⁵	97%	91%
1995	94% ⁶	82%	94%	95%	92%
1996	93%	83%	93%	97% ⁷	92%
1997	N/A	N/A	N/A	N/A	83% ⁸
1998	86%	74% ⁹	86%	92% ¹⁰	85%
1999	88% ¹¹	82% ¹²	85% ¹³	91% ¹⁴	87%
2000	90%	85%	86%	89%	88% ¹⁵

The Minister for Public Enterprise is on record as to the need to improve quality¹⁶ “... *it appears that quality of service in terms of next day delivery is not being maintained. This is cause for concern among the public. One of the objectives ... is that An Post should ensure that the quality of the Company's mail service is improved to a level where 95% of letters posted in the State are delivered on the next working day.*”

2.1.2. Intra-Community cross-border Letter Mail Services

From a European perspective the Single Market can only function with good communications and distribution channels. Efficient and cost effective postal services have an essential part to play in providing these channels to ensure free movement of goods and services, and the intra-Community cross-border letter mail services play an important role here.

³ Statistics from An Posts Annual Reports for years 1993-1999

⁴ Q1 1994 = 70%

⁵ Q4 1994 = 96%

⁶ Q4 1995 = 96%

⁷ Q's 2 & 3 1996 = 99%

⁸ An Post changed contractor; significant technical changes to basis of measurement.

⁹ Q1 1998 = 66%

¹⁰ Q3 1998 = 94%

¹¹ Q3 1999 = 93%

¹² Q1 1999 = 75%

¹³ Q1 1999 = 79%

¹⁴ Q3 1999 = 93%

¹⁵ Statistics provided by An Post that will be published in its forthcoming Annual Report.

¹⁶ Speech to delegates at the 1999 Annual Conference of the Communications Workers Union

In most countries International mail has not been given priority, largely because it represents such a small percentage of items delivered. The level of quality for intra-Community cross-border mail within the EU has therefore been varied and unsatisfactory. This led to the emergence of other competitive services such as ‘Express Mail’ and ‘Remail’.

International mail is of much greater significance to Ireland, representing about 10% of total letter mail posted and 20% of letter mail delivered in the State.¹⁷

2.1.3. The European Commission’s response

One of the principal needs identified in the Postal Directive was the need to secure significant improvements in the quality of postal services. Recitals 5, 6 and 7 of the EU Postal Directive state:

(5) Whereas the current extent of the universal postal service and the conditions governing its provision vary significantly from one Member State to another; whereas, in particular, performance in terms of quality of services is very unequal amongst Member States;

(6) Whereas cross-border postal links do not always meet the expectations of users and European citizens, and performance, in terms of quality of service with regard to Community cross-border postal services, is at the moment unsatisfactory;

(7) Whereas the disparities observed in the postal sector have considerable implications for those sectors of activity which rely especially on postal services and effectively impede the progress towards internal Community cohesion, in that the regions deprived of postal services of sufficiently high quality find themselves at a disadvantage as regards both their letter service and the distribution of goods;

The EU Postal Directive therefore sets down specific Quality of Service targets for intra-community mail, viz:

Quality standards for intra-Community cross-border mail

The quality standards for intra-Community cross-border mail in each Country are to be established in relation to the time limit for routing measured from end to end¹⁸ for postal items of the fastest standard category according to the formula D+n, where D represents the date of deposit¹⁹ and n the number of working days which elapse between that date and that of delivery to the addressee.

¹⁷ Study on the impact of liberalisation of community cross-border mail. PriceWaterhouseCoopers for the European Commission. December 1998

¹⁸ End-to-end routing is measured from the access point to the network to the point of delivery to the addressee.

¹⁹ The date of deposit to be taken into account shall be the same day as that on which the item is deposited, provided that deposit occurs before the last collection time notified from the access point to the network in question. When deposit takes place after this time limit, the date of deposit to be taken into consideration will be that of the collection on the following working day.

Quality standards for intra-Community cross-border mail

Time limit	Objective
D +3	85% of items
D +5	97% of items

The standards must be achieved not only for the entirety of intra-Community traffic but also for each of the bilateral flows between two Member States.

Ireland is one of 14 Member States who have signed the REIMS II Terminal Dues Agreement. Under this agreement An Post is committed to deliver 95% of incoming letter mail the day after its receipt in Ireland. The agreement also links the remuneration received for delivering incoming international mail to achieving the quality of service standards.

2.2. Current Monitoring Arrangements

An Post is conscious that the customer demands a high quality postal service and wants to know how the service is performing. The importance attributed to quality in the postal service has been demonstrated by the fact that An Post has, since it was established in 1984, published in its Annual Reports statistics outlining quality performance. Until recently it has also published results on a quarterly basis in the National Newspapers.

Until 1997 independent contractors carried out monitoring of letter post quality on behalf of An Post. Performance measurement was conducted for one week out of every four weeks. However, in conducting quality of service monitoring only correctly addressed POP letters²⁰, posted in Ireland in time for night despatch, were used. Measurements with regard to quality indicated that clearance and distribution of internal letter mail achieved between 91-94% next day delivery for the years 1993 to 1996.

Since late 1998 the system has been changed to use an end-to-end performance measurement. The study is designed to provide an independent assessment of the national delivery performance achieved for all correctly addressed POP letters, “flats”²¹ and “packet”²² mail, posted within Ireland, in time for next day delivery. It is based on a statistically valid sample of test mail produced and inducted under the independent contractor’s control, into a number of representative routes. Performance measurement is conducted on a continuous weekly basis throughout the year. The statistical design of the study is representative of the mail pattern and of the range of letter sizes, weights, franking methods and varied mailing practices of both business and private customers, as specified by An Post to reflect the real patterns and characteristics of domestic mail in Ireland. Current statistics give an 88% quality of service standard for next day delivery of domestic mail.

There are now similar monitoring arrangements in place in respect of Intra-Community cross-border letter mail.

²⁰ Post Office Preferred, generally envelopes up to C5 size (235 mm x 162 mm)

²¹ Dimensions not exceeding 400 mm x 300 mm x 25 mm

²² Dimensions exceeding 400 mm x 300 mm x 25 mm

2.3. What needs to be done

The Regulations require the Director to lay down quality standards for domestic mail services which are compatible with those laid down for intra-Community cross-border services. They do not specify that only one target shall be set or that it should be confined to the basic letter service.

The practice elsewhere in Europe is to set a number of quality targets to be achieved, e.g., services, routes, etc. In Britain, the Postal Services Commission has set 18 separate National targets to be achieved as well as a number of targets for intra postcode area mail and for local mail.

Quality of Service Standards - Consultation Issues

3. How can quality be improved?

To achieve next day delivery for mail posted at the close of the normal business day means that the collection and outward sorting processes have to be completed within a very short time frame. When mail was sorted manually it was relatively easy to adjust the system capacity to cope with day to day fluctuations in the volume of business, by increasing/decreasing the amount of labour. Now that much of the postal network throughout Europe has been automated, significant flexibility has been lost. Postal operators are faced with a choice between improving efficiency and/or providing additional equipment that will be under-utilised for most of the day, or providing less equipment and trying to extend the time available to process the mail. This points to at least three alternative approaches to improving quality.

3.1. Provide extra capacity

This involves either installing extra sorting machines or replacement machines with enhanced capacity, eg faster throughput, greater reliability. This investment needs to be financed, either by increasing the price of a stamp or else by seeking efficiency gains in the sorting processes.

3.2. Review the efficiency of operation

In some instances the efficiency gains may directly lead to improved quality. Examples of the efficiency gains coming under this heading include

- the optimal routing of collection vehicles to avoid traffic congestion points; and
- increasing the throughput of sorting machinery by persuading customers to use sizes and types of envelopes that can be sorted more easily and other changes in procedures.

3.3. Reduce volume to be processed at peak periods

Capacity is constrained by the sheer volume of items to be simultaneously processed resulting in an arbitrary selection of the letters which are not processed in time for next day delivery. Ireland is most unusual in that An Post operates a single stream and its customers do

not have to make a choice between priority (next day) service and economy service. It is quite possible therefore that letters which require next day delivery do not receive it, and vice-versa. A consequence of this is that in overall terms An Post probably delivers on the working day after posting a greater percentage of all letter mail posted than other European Postal Companies, but a smaller percentage of the letters than actually need to be delivered the next working day.

3.3.1. Introduce Priority / Economy service

The introduction of a two-tier stream for mail may provide an answer to capacity constraints experienced by the current system. This would provide the customer with an element of choice. Priority mail would be delivered the next working day (D+1) while economy mail may be delivered up to two days later (D+3). The speed of delivery required would determine the price to be paid.

The disadvantage of this is that it would involve introducing another process into the mail chain, ie segregation of priority mail from economy mail. It would be most important to ensure that this was organised in an efficient way.

3.3.2. Special incentives for bulk postal users

Another approach geared to achieving the same benefit would be to promote more aggressively the specialised services targeted at the bulk poster, under which discounts are given on the understanding that the mail would not be processed at peak periods and that delivery might therefore take up to a day longer.

<p>Question 3</p>	<p>(a) Do you consider that the single post category should continue and that quality improvements should be found in other ways?</p> <p>(b) What do you think is the scope for increasing investment and its impact on quality of delivery?</p> <p>(c) If you consider that increased investment would impact positively on quality of service, what relationship do you consider should operate between increased quality and a price increase? Would an increase in quality delivery of say 10% justify a 10% increase in the price of a stamp? Or</p> <p>(d) Do you think that quality should be improved by seeking improvements in efficiency?</p> <p>(e) Should customers be given a choice by introducing a two-speed service and/or offering special incentives to bulk posters?</p> <p>(f) Can you suggest some other measures?</p>
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4. Measurement of Quality

4.4. What should be measured?

Until now, An Post has measured quality of service from its own perspective as supplier of the service, ie on the basis of what it provides. From the operator's perspective delivery time means the time between the collection of a letter from a post box or post office counter and delivery to the addressee. The time does not start until the operator actually has the letter in his hands. Measured here is the internal delivery time – from provider to addressee. The operator's cut-off times (latest posting time at the counter, latest collection time at post boxes) plays a key role. For example, if the latest posting time is 3pm rather than 5pm there is more time to sort the letters before they have to be despatched to the delivery office.

However, the practice in Germany is to measure the delivery times both from the customer's and from the operator's perspective. From the customer's perspective delivery time means the time between posting a letter in a post box or at post office counter and delivery to the addressee. The clock starts as soon as the letter is out of the customer's hands. Measured, then, is the time from end to end – from sender to addressee. The operator's variable cut-off times do not have any bearing on the results for this method.

In Germany, the results for next day delivery vary considerably, e.g. next day delivery from the customers perspective for the year 2000 was 86.7% while from the operator's perspective it was 95.6%.

From an Irish perspective there are two additional factors that need to be taken into account:

- Often there are collections from post boxes after the latest posting time, eg it may be necessary to post in time for the 5.30pm collection to secure next day delivery, while there are later collections at 7.30pm and 10.30pm.²³
- If measured from the customer's perspective there is a practical need to specify a latest acceptable posting time.

²³ It should be noted that the intra-community targets set by the European Commission are measured from the **last** collection of the date at each posting point.

Question 4.1	<p>Views are sought as to when the measurement of performance should commence:</p> <ul style="list-style-type: none"> (a) the <i>latest</i> collection times, specified by An Post, to secure next day delivery [eg 5.30 PM]; (b) a time that reflects customers expectations of the latest acceptable posting time for next day delivery; or, (c) the advertised time of the <i>last</i> collection from the particular posting point [eg 10.30 PM]. <p>If (b) is suggested, then what time is appropriate, e.g., 5.30 p.m. in town centres and midday in rural areas?</p>
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4.5. How should it be measured?

4.5.1. Actual (“Live”) mail

Live mail consists of mail as it is presented to postal employees on a day-to-day basis. This type of mail may include illegible and poorly addressed mail in all formats. Live mail can only be measured from the date of post-mark stamped by the postal employee on the envelope to the time of delivery to the intended recipient. The date of posting shown on the envelope only reflects the date which the postal operator acknowledges receiving it for processing.

Therefore live mail can only be used for calculating performance from an operator’s perspective; also some of the delay may be attributable to customer error (e.g. an incorrectly written address). On the other hand it is more likely to be representative of the characteristics of mail generally since it uses actual mail.

4.5.2. Test Mail

Test Mail is the means by which An Post currently measures letterpost quality of service in Ireland. The statistical design of the study is representative of the mail pattern and of the range of letter sizes, weights, franking methods and varied mailing practices of both business and private customers, specified by An Post as reflecting the real patterns and characteristics of domestic mail which ordinarily flows through the postal system in Ireland

Currently An Post contracts this measurement to an independent body. However An Post plays a significant role in determining the composition of the statistical samples and this leaves it open to the accusation that it can influence the results.

Provided that rigorous procedures are put in place to ensure that the composition of each batch of test mail is characteristic of the actual (live) mail and the various delivery routes and patterns of live mail, Test Mail can be used to measure quality of service from both the customer and operator’s perspective.

4.5.3. A combination of Live Mail and Test Mail

Live Mail could also be used in conjunction with Test Mail; in particular the use of periodic samples of Live Mail to ascertain the characteristics of mail and collaborate results could be beneficial.

Question 4.2	Your views are welcomed as to whether measurement should be conducted on test or live mail or both? Please give your reasons.
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4.6. Who should measure Quality?

4.6.1. An Post

Since 1984 An Post has commissioned performance measurement in conjunction with an independent body who carried out the measurement on an end-to-end basis and has invested substantial resources and expertise in this exercise to date.

4.6.2. ODTR

Regulation 13 states that the Director shall monitor quality of service standards achieved by a Universal Service Provider. The cost of such monitoring will be significant. The current practice, under which An Post carries out monitoring, provides An Post management with detailed information about postal routes which, while not published, is beneficial to the company in identifying and correcting points in the network that are impacting on quality.

The Director believes that it will be necessary for her Office to undertake the monitoring itself, using consultancy assistance. She recognises, however, that for the reason set out above, there may be benefit in setting up arrangements for the task to be undertaken on behalf of the Office by An Post which would submit the results to the ODTR for publication.

Question 4.3	Your views are welcomed as to whether An Post should continue to commission monitoring of quality of service standards or whether the ODTR should enter into a contract with an independent body to carry out this function directly.
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4.7. Who should publish the results?

4.7.1. An Post

Since 1984 An Post has published results for quality of service once a year in their Annual Report.

4.7.2. ODTR

Regulation 13 states that the Director shall publish a report of the results of the monitoring exercise at least once a year.

There would be some merit in An Post continuing to publish the results, but in a form and timescale specified by the Director, in addition to the ODTR meeting its statutory obligation

by publishing an annual report. This would allow for the latest results to be prominently displayed in each post office as well as on the ODTR and An Post websites.

Question 4.4	<p>Your views are welcomed as to whether</p> <p>(a) in addition to the publication of results by the ODTR An Post should also publish information, and if so at what frequency and in what format?</p> <p>(b) the ODTR should publish the results of the monitoring exercise more frequently than annually and if so, at what interval?</p>
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5. Targets for Letter Services

5.8. Next Day Delivery of National Letters

The obligation on the ODTR is to set a target for the next day delivery of letters. Three options have been identified:

- **A 90%** An Post’s internal target which is published in their Annual Reports and price list brochures.
- **B 95%** The target accepted by An Post under the REIMS II agreement for the delivery of incoming intra-Community cross-border mail.
- **C 97%** A figure which takes account of An Post’s network design, and makes some allowance for “human error” and the difficulty of matching sorting capacity with actual traffic.

There is no logistical (network design) reason for setting a low target in Ireland. An Post has advised that “*the network and circulation plans have been designed to provide full next day delivery capability to all routes nationwide*²⁴.” Whereas in some countries it may only be possible to achieve say 95% next day delivery if the network is operating efficiently, in Ireland it should be possible to achieve 99.8%.

In practice it will never be possible to achieve such levels of efficiency. An Post has been unable to provide a definitive reason why such a large proportion of letters does not receive next day delivery. Possible explanations include capacity in sorting offices and collection of mail from post-boxes and post offices.

²⁴ 9 Islands off the South and West coasts only receive mail on 2-4 days a week. The population affected (801 - 1966 Census) represents less than 0.02% of the State’s population.

The current quality of service achievement is 88% (statistic provided by An Post which will be published in their forthcoming Annual Report); therefore one letter in eight fails to secure next day delivery. This is an average figure and is obviously higher at some times of the year and on some routes.

A target of 90% would still mean that 1 letter in 10 was not delivered the next day. This would not appear to be satisfactory in the light of the REIMS target set by An Post itself, or the level of service that reflects the level of service that might be provided if An Post's letter services were fully exposed to competition.

A target of 95% or 97% may be considered, but either of these would involve a substantial leap forward by An Post's quality of service team, and it may be necessary to phase in such a target as follows:

- in excess of 90% by year end 2001
- 95% achieved by year end 2002 and
- an overall average of 97% by year end 2003

Question 5.1	<p>Do you agree that 97% should be set as the target for next day delivery of letters?</p> <p>Do you agree with that An Post should be given until the end of 2003 to achieve that target as outlined above?</p> <p>If you think that a target lower than 97%, or a phasing period that is shorter/extends beyond the end of 2003, is appropriate please give your reasons.</p>
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5.9. Reliability

Whatever target is set it is necessary to address what happens to those letters that are not delivered the next day. This measurement of reliability is sometimes referred to as "Tail of Mail". A target of 99.5% within 3 days is suggested for this mail thus making allowance for failures outside the control of An Post, e.g. mail which is delivered to the wrong address (An Post's fault) may not be reposted by the person who receives it in error (outside control of An Post). The ODTR is of the opinion that this target should be put in place from the beginning of 2002.

Question 5.2	Do you agree that 99.5% of letters mail should be delivered within 3 days from the beginning of 2002?
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5.10. Specific routes

An Post has traditionally published results for broad groupings such as:

- Dublin to Dublin
- Dublin to Provinces

- Provinces to Provinces
- Provinces to Dublin

Other Regulators have focused on setting targets for mail posted in specific areas. In Britain, Postcomm sets targets for each Postcode area, for intra postcode area mail and for all mail posted in each area, e.g., the target for mail posted in Northern Ireland is 92.5% for delivery within Northern Ireland and 90% next day throughout the UK.

An Post's letter network is based on 11 Letter Forwarding Offices (LFO's): Dublin (2), Athlone, Bray, Navan, Portlaoise, Cork, Tipperary, Tralee, Sligo and Limerick. The necessity to set separate targets for mail posted in each of these areas would only arise if the nation-wide target was low.

Question 5.3

Considering that a nation-wide target of 97% is proposed, should a target in excess of this be set for mail posted and delivered within these eleven areas? If you feel that a higher target should be set please specify and give your reasons.

5.11. Letter mail to Northern Ireland and Britain

In theory these are intra-Community cross-border mails and are therefore subject to the Quality of Service targets set by the Commission.

Such mail represents more than half of all cross-border mail. From the foundation of the State until a few years ago, they were treated as part of the inland service.. Mail to Northern Ireland is still charged at the local rate and there is a special rate to Britain that keeps the basic rate to 30p. Against this background it seems reasonable that there should be special targets for the Quality of Service of such mail that reflects this unique relationship. This could prove significant in border areas, e.g. Dundalk/Newry or Lifford/Strabane.

Question 5.4

Your views are sought as to whether it would be appropriate to set a target such as 95% within 2 days for letter mail to and from Northern Ireland and Britain.

5.12. Different periods

Statistics show that increased traffic can be expected at particular times of the year but especially during the months of March and December. The issue to be addressed here is whether periods of increased traffic should be excluded from the measurement of quality, or whether different targets should be set for these periods.

An Post currently publishes results for quality measurement over a 12 month period in its Annual Reports. However, it claims that other European postal operators exclude peak periods such as Christmas from their results due to increased mail traffic. It suggests that if periods such as Christmas were included in the statistics published by other postal operators then the average quality for the year as a whole would fall dramatically.

Question 5.5

Your views are welcomed as to whether Christmas and other peak periods should be included/excluded for measurement and

	publication? Please give your reasons.
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5.13. Mail characteristics

Irrespective of whether targets are set for specific categories of letter mail it is necessary to consider whether it would be beneficial to customers to have an analysis of different segments of mail.

For example, irrespective of whether separate targets are set for specific routes, the question of publishing results for mail posted in each LFO area as set out in section 5.3 needs to be considered.

Letter mail is handled in three streams, Post Office Preferred (POP) letters, flats and packets. It may be useful to the customer to know whether the quality afforded to each of these streams differs from the overall average.

The efficiency of the sorting process depends on the way mail is presented. This is especially important when mail is sorted by OCR²⁵ equipment. Research has shown that typewritten white envelope rate might be sorted more efficiently than window or brown envelopes, or handwritten items. There are a number of reasons for this. Customer error can arise when folding letters for window envelopes and the address might not be clearly visible. The darker colour of the envelope can also make it more difficult to read the address. Hand written addresses on envelopes often presents the greatest problem, and some hand-written mail has to be sorted manually.

Question 5.6	Your views are welcomed as to whether it would be useful to the customer to know what quality is afforded to each category of mail as discussed in this section?
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6. Targets for other services

The European Commission has only set one target, i.e., for intra-community letters. However, Regulators in other countries have set targets for each service provided. An Post has an in-house *track and trace system* for key streams of mail which provides accurate information, and which also enables the sender to use the internet or telephone to monitor the delivery of their particular item:

Track and trace is currently used by An Post for the following services:

- Registered Letters
- Swiftpost
- most Parcels
- EMS (Express Mail service)

Is there a need to set separate targets and to publish results for these services and also for *Postaim*, An Post's Direct Mail service. The Director would welcome the views of customers, but intends to defer a decision on this issue until later in the year.

Question 6	Should separate targets be set for Registered Letters, Parcels, etc or is
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²⁵ Optical Character Recognition

	the availability of <i>Track and Trace</i> information an adequate substitute?
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7. Conclusion

The issues outlined in this paper will facilitate a comprehensive debate about the quality of service that An Post will be required to provide under the new regulatory regime. A large proportion of the postal services market is closed to competition due to the designated reserved area which has been assigned to An Post, and only limited competition is available in the unreserved area. With that in mind it is imperative that An Post delivers the best postal service possible. Bearing in mind the interests of all postal users, the ODTR suggests that the current level of quality, i.e. 88% next day delivery, for national letter mail is not acceptable.

The ODTR is obliged by law to set and monitor quality-of-service targets to be achieved by An Post. A reasonable transitional period to enable An Post to meet these new targets may be required.

8. Submitting Comments

The Consultation period will run from Monday 30th April, 2001 to Friday 1st June, 2001 during which time the Director welcomes written comments on any of the issues raised in this paper. The ODTR will publish the names of all respondents and may summarise the responses received as part of its report on the consultation.

All comments are welcome, but the task of analysing responses will be simplified if comments are referenced to the relevant question numbers from this document.

In order to promote further openness and transparency, the ODTR will make copies of the comments available for public inspection at its offices, excluding commercially sensitive information. Where material that is commercially sensitive is included in a response, this should be clearly marked as such and included in an Annex to the response.

All responses pursuant to this consultation should be clearly marked "Reference: Submission re ODTR 01/28" And sent by post, facsimile or e-mail to:

Ms. Jean Bonar
Office of the Director of Telecommunications Regulation
Irish Life Centre
Abbey Street
Dublin 1
Ireland

Phone: + 353 1 804 9600 Fax: + 353 1 804 9665 Email: bonarj@odtr.ie

to arrive on or before 5 p.m., 1st June, 2001.

Apart from acknowledging responses, the Director regrets that she will not, during the consultation period, be able to enter into correspondence with persons contributing comments on this consultation paper.

Office of the Director for Telecommunications Regulation

Monday 30th April, 2001

This consultation paper does not constitute legal, commercial or technical advice. The Director is not bound by it. The consultation is without prejudice to the legal position of the Director and to her rights and duties under legislation.