



Commission for
Communications Regulation

Consultation Paper

Regulation of Postal Services – Universal Service Obligation - Bulk Mail Access

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All responses to this consultation should be clearly marked:-
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Please note ComReg will publish all respondents submissions
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of ComReg’s guidelines on the treatment of confidential
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1 Foreword

ComReg is the National Regulatory Authority for the Postal Sector in Ireland. In that context one of the principal functions of ComReg is 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.

ComReg is statutorily obliged to ensure that access points take account of the needs of postal service users. Currently An Post, the Universal Service Provider, offers full bulk mail access only at four locations and restricted access at a further twenty locations.

ComReg has an important role to play in relation to consumer affairs and the promotion of the interests of all postal users, both business and residential. There may be tangible benefits for postal users arising from an expansion of the number of access points nationwide that currently offer full bulk mail access – a view that is generally supported by postal consumers in their interaction with ComReg.

In order to focus the debate, this consultation paper outlines a list of indicative access points, based on all major towns and cities including those listed in the National Spatial Strategy. This indicative list suggests an expansion in the number of sites at which the full range of bulk mail services is available.

A key input to this consultation is the view of postal users of their requirement for full bulk mail access at these or other locations, along with the identification and substantiation of benefits. A further factor will be An Post's assessment of the impact on its operations, positively or negatively, such an expansion would bring, in terms of costs, labour and efficiencies. ComReg welcomes views supported by any information, evidence or other relevant data that respondents may have as to why An Post should or should not offer a full bulk mail service at these or indeed any other locations.

I urge all interested parties to respond in the time set aside for submissions.

Mike Byrne
Commissioner

2 Executive Summary

The issue of ‘Bulk Mail Access’ has been raised in a number of ComReg publications since 2002. ComReg has yet to issue a direction to An Post on this matter but has previously undertaken to intervene, on a case by case basis and at the invitation of any specific An Post customer, when it can be shown that the normal process of commercial negotiation has been exhausted.

In 2004 ComReg received complaints from some users of bulk mail services regarding their inability to access An Post’s services during an industrial dispute earlier that year. In essence, there was concern that equal access was not being provided to all postal users.

In May 2004, ComReg published a consultation that proposed setting out, in a direction to An Post, a specific number and location of bulk mail access points to be made available to postal users¹. The decision was taken to issue a direction, and as part of the Response to Consultation (ComReg 04/92), ComReg invited submissions from An Post and other interested parties regarding the length of time needed by An Post to put arrangements in place, difficulties which might be encountered at specific locations and the impact on customers or the development of the postal sector as a direct consequence of issuing the Direction. By the extended closing date in January 2005 two responses were received but in the event ComReg decided not to finalise the proposed direction. This was due to ongoing discussions between An Post and its staff bodies on the reorganisation of An Post’s collection and delivery arrangements given the potential impact any agreement could have on bulk mail access arrangements. Additionally An Post was due to revert to ComReg with revised pricing proposals.

In March 2005 ComReg launched a consultation to formulate a working definition of the universal service. The response to consultation confirmed that the working definition of the universal service should include a bulk mail service namely a service offering ‘delivery only’ to businesses, bulk mailers or consolidators of mail from different customers who are able to present their mail sorted in delivery sequence or by delivery office. The working definition refers to a service offering deferred delivery and a combination of delivery only and extended delivery cycle².

This particular consultation paper specifically concerns access to the postal network. The current position is that users of bulk mail services are restricted in relation to the number of access locations on offer and/or the prices available. Today there is full access at four locations³, restricted access at a further twenty locations⁴ and no access

¹ ComReg 04/54 Consultation – Universal Service Obligation – Bulk Mail Access – Draft Direction to An Post

² For example the existing Postaim service without any restriction as to content

³ Dublin (Knockmitten), Cork (Little Island), Portlaoise and Athlone

⁴ Bray, Castlebar, Cavan, Clonmel, Drogheda, Dublin 2 Delivery Office (Cardiff Lane), Dundalk, Ennis, Galway, Kilkenny, Letterkenny, Limerick, Longford, Naas, Navan, Roscommon, Sligo, Tralee, Waterford and Wexford

at thirteen centres where the population is in excess of 10,000⁵, or in the county administrative areas of North Tipperary, Monaghan and Leitrim. In addition all prospective customers are required to have an account with An Post or pay by meter franking machine, the terms and conditions for both of which limit the customer to a single access point for all mail. Another issue that ComReg must address is An Post's claim that the current offering is sufficient for customer needs and is all that can be done from an operational perspective.

It seems that there are potential benefits to be derived by the postal market if An Post was to offer access points nationwide to bulk mail customers. Such benefits could include a lessening of customer discrimination, volume growth opportunities for An Post, improvements in quality of service and enhanced customer relations.

In this paper ComReg has compiled an indicative list comprising the existing twenty-four acceptance locations that currently accept pre-sorted and deferred delivery mailings of between 500 and 2000 items and an additional twenty-four locations, cities and large towns in the main, along with those towns included in the National Spatial Strategy but not already listed.

The difficulty is to reconcile An Post's statutory obligation to provide a nationwide service under the 1983 Postal and Telecommunications Services Act Section 12 with the current treatment of bulk mail customers. The main consultation issue concerns the indicative list of general access points and whether An Post is capable of meeting the needs of customers who wish to avail of full bulk mail services at location points nationwide. The consultation also seeks to clarify if there is a demand by postal users to have a choice of access points (multiple access points) at which their bulk mail is accepted⁶. In addition, ComReg raises a number of specific questions for An Post concerning the potential impact, if any, on its operations arising from this consultation, in terms of costs, labour, efficiencies and any measures that could be taken to curb, minimise or counteract any unfavourable effects.

⁵ Based on 2002 Census of Population: Balbriggan, Cork City, Swords, Carlow, Cellbridge, Leixlip, Tullamore, Greystones, Killarney, Mullingar, Sandyford, Droichead Nua and Maynooth

⁶ The final list of Access Points will be subject to periodic review by ComReg in line with customer demand.

3 Introduction

3.1 Legal

Regulation 4 (1)(b)(ii) of the European Communities (Postal Services) Regulations 2002⁷ (“the Regulations”) requires ComReg, after consultation with interested parties, to issue directions to An Post, the Universal Service Provider, to ensure that the density of the points of contact and of access points takes account of the needs of users.

Access Points are defined in the Regulations as physical facilities, including letter boxes provided for the public either on the public highway or at the premises of the universal service provider, where postal items may be deposited with the public postal network by customers. Users are defined as any natural or legal person benefiting from universal service provision as a sender or an addressee.

3.2 Definitions

For the purposes of this paper:

“Bulk Mail” means a substantial number of similar postal items which are deposited with An Post, or any other service provider, at the same place and time, to be conveyed and delivered to the addressees indicated on the items.

“Direct Mail” is a form of Bulk Mail; the 2002 Regulations define it as *“...a communication consisting solely of advertising, marketing or publicity material and comprising an identical message, except for the addressee's name, address and identifying number as well as other modifications which do not alter the nature of the message, which is sent to a significant number of addressees, to be conveyed and delivered at the address indicated by the sender on the item itself or on its wrapping and includes cross-border as well as domestic mail, but does not include bills, invoices, financial statements or other non-identical messages and communications combining direct mail with other items within the same wrapping.”*

“Pre-sort Service” means that the originator of Bulk Mail, or his agent, undertakes to sort his mail in accordance with the sorting plan required by the Universal Service Provider (USP), before depositing it with the USP, so that it can be treated as a single aggregated unit of mail until it is received at the designated Delivery Office, where it is disaggregated for final delivery.

3.3 Previous Publications

The issue of ‘Bulk Mail Access’ has been raised in a number of ComReg publications since 2002. It is useful to provide some background to events in the intervening period.

⁷ S.I. 616 of 2002

3.3.1 Access Point Issues

3.3.1.1 2002 USO Consultation & Response to Consultation 2003

In November 2002 ComReg issued a consultation⁸ on An Post's universal service obligations which included two questions: on Bulk Mail, one in relation to the density of access points, and the other to help decide that which constitutes "a significant number of addressees in relation to direct mail".

The consultation was overshadowed by An Post's proposals to deliver to roadside letter boxes rather than to the "home or premises" in respect of approximately one-third of the delivery points in the State. Respondents to the consultation focused on this issue and on postcodes, and it is possible that not all concerns surrounding access to An Post's network were raised at the time.

ComReg issued a direction in 2003⁹ to ensure that the density of access points met the needs of users. With regard to access points for Bulk Mail, ComReg's decision as published in ComReg 03/50 D11/03 was that *'With regard to access points for Bulk/Direct Mail, ComReg do not propose to issue a Direction to An Post at this time but will intervene on a case by case basis at the invitation of any specific customer when it can be shown that the normal process of commercial negotiation has been exhausted'*.

3.3.1.2 2004 Bulk Mail Access Consultation & Response to Consultation 2005

In 2004 ComReg received complaints from some users of bulk mail services regarding their inability to access An Post's services during an industrial dispute in March and April of that year. In essence, there was concern that equal access was not being provided to all postal users.

Industrial action was, in the main, confined to mails processing at the Dublin Mails Centre and delivery in Drogheda, Tuam and a number of smaller centres. Mail posted in the catchment areas of the three provincial mails centres (Cork, Athlone and Portlaoise) was being processed and mail could be delivered to the vast majority of addresses. Even within Dublin, mail posted at the relevant delivery office was delivered, provided postage was paid by postage stamps. However An Post did not permit account customers who usually posted bulk mail at the Dublin Mails Centre (DMC) to post at Portlaoise or Athlone instead. An example of the effect of this was that depending on the access point available to the company who produced and processed utility bills one telecoms provider could transact business as normal whereas another was unable to as its regular access point was impacted by the dispute.

A key argument put forward by bulk mail postal users at the time was that if access was provided at delivery office level, and provided that mail was sorted for

⁸ ODTR 02/95 Regulation of Postal Services - Universal Service Obligation, Tariff Principles and miscellaneous issues,

⁹ ComReg 03/50 D11/03 Decision Notice & Response to Consultation Postal Services - Universal Service Obligation, Tariff Principles and miscellaneous issues,

delivery to addresses for that specific delivery office, then the impact of the dispute would not have the effect of denying them access to those postal services still available.

In May 2004 ComReg launched a consultation¹⁰ in relation to the merits of issuing a direction to An Post which would set out the specific number and location of access points available to Bulk Mailers. Virtually all respondents except two believed that there was a need for ComReg to issue a direction. TPG¹¹ maintained that it was best to leave these matters to competition while An Post argued that ComReg did not have the power to issue a Direction¹².

The decision was taken to issue a direction, and as part of the Response to Consultation (ComReg 04/92), ComReg invited submissions from An Post and other interested parties regarding three matters that had to be resolved before the direction could be finalised:

- a) the length of time needed by An Post to put arrangements in place,
- b) difficulties which may be encountered at specific locations
- c) the impact on customers or the development of the postal sector as a direct consequence of issuing the Direction.

In advance of the deadline for responses of 30 November 2004 An Post sought an extension to 28 January 2005, citing the following reasons:

- a) The enormity of the issue in terms of making arrangements for the acceptance of mail at Delivery Offices nationwide
- b) The possibility that this issue might feature in the discussions regarding the then current domestic price negotiations
- c) The European Commission decision – Article 86 case against Germany with regard to the interpretation of the reserved area
- d) An Post's regulatory team resources being then concentrated on pricing matters.

In granting the extension in November 2004, ComReg took into account the ongoing discussions with An Post regarding the pricing submission submitted on 31st May 2004 and the fact that An Post had indicated verbally to ComReg that it might be mid January 2005 before it would revert on all of the pricing issues. To facilitate An Post to address the pricing issues and respond to the bulk mail paper

¹⁰ ComReg 04/54 Consultation Paper – Regulation of Postal Services – Universal Service Obligation – Bulk Mail Access – Direction to An Post

¹¹ now named TNT

¹² ComReg 04/92 Response to Consultation – Universal Service Obligation – Bulk Mail Access – Draft Direction to An Post

ComReg agreed to an extension until 17 January 2005 for responses on the draft direction on bulk mail access¹³.

By the closing date in January 2005 two responses were received, from An Post and TiCo. However, due to prevailing circumstances, it was considered inappropriate to process these submissions at that time as:

- Discussions on the reorganisation of An Post's collection and delivery arrangements were still ongoing with the help of the State's industrial relations conciliation processes issues, and the outcome of these could impact on what An Post could do in terms of bulk mail access.
- An Post had yet to revert with revised pricing proposals.

3.3.2 *Scope of Universal Service & Pricing*

The responses received for the initial bulk mail consultation raised issues regarding services, pricing and associated access terms and conditions. While ComReg has regulatory functions in regard to pricing of services and associated terms and conditions it is not possible to deal with these matters within a Direction issued under Regulation 4(1)(b) (ii) and therefore these issues were not addressed in the Response¹⁴. ComReg's consultation was quite precise; it was purely about the ability to access bulk mail services.

Prior to the August 2003 price increase An Post offered its customers a Postaim service (presorted, i.e. delivery only, with an extended delivery cycle - introduced in 1986¹⁵) and two discount services, 'early presentation' and 'pre sorting' (introduced in 1999¹⁶). As part of the 2003 price increase an extended range of discount services was provided, offering discounts for early presentation, deferred processing, pre sorting and a new discount for postings of 500 items¹⁷ or more allowing An Post two days to process the mail.

As a result of uncertainty raised¹⁸ as to which services were inside the scope of universal service ComReg sought legal advice. ComReg then launched a consultation¹⁹ in March 2005 to formulate a working definition of the universal service. In this paper ComReg outlined a limited range of bulk mail services that should be regarded as part of the universal service including:

¹³ *ibid.*

¹⁴ ComReg 04/92 Response to Consultation – Universal Service Obligation – Bulk Mail Access – Draft Direction to An Post

¹⁵ Inland Post Amendment (No. 36) Scheme, 1986 S.I. No 362 of 1986

¹⁶ Inland Post Amendment (No 60.) Scheme 1999 S.I. No 61 of 1999

¹⁷ ComReg 03/100 Response to Consultation introduced the new discount for postings of 500 items or more which was to be further reduced to 350 on 1 September 2004.

¹⁸ Response to consultation ComReg 04/92 Ref 3.6 Also see An Post response published in the ComReg 04/92 Annex Part A

¹⁹ ComReg 05/16 Consultation Paper – The Universal Postal Service –Formulating a working definition

- a service offering ‘delivery only’ to businesses, bulk mailers or consolidators of mail from different customers who are able to present their mail sorted in delivery sequence or by delivery office,
- a service offering deferred delivery, and
- a combination of delivery only and extended delivery cycle²⁰.

The response to consultation was published in November 2005²¹. In response to question 4 - ‘*Should the universal service include a bulk mail service?*’ - all respondents agreed that the universal service should include a bulk mail service. However in response to question 5 - “*What bulk mail services should be included as part of the universal service?*” - there was some divergence. An Post’s opinion was that although the standard bulk service forms part of the universal service, bulk discount services did not form part of the USO. ComReg noted An Post’s contention but was firmly of the view that this was not the case, given that the nature of a service did not change dependent on the price charged.

²⁰ For example the existing Postaim service without any restriction as to content

²¹ ComReg 05/85 Response to Consultation – The Universal Postal Service – A working definition

4 Consultation Issues

This paper concerns the issue of access to the postal network. The current position is that users of bulk mail services:

- are restricted to four An Post locations in Dublin (Knockmitten), Cork (Little Island), Athlone and Portlaoise which offer full access. These locations are, it would seem, primarily determined by An Post’s operational arrangements and so are not fully aligned with the commercial and administrative centres in the State;
- can access services at an additional 20 locations but the prices / services on offer are not as favourable as those on offer at the four principal access points;²²
- have no access at twenty-four centres, where the population²³ is in excess of 10,000²⁴ or are designated as Gateways, Hubs, Primary Development Centres and County Towns in the Government National Spatial Strategy; and
- must have an account with An Post or pay by meter franking machine, the terms and conditions for both of which limit the customer to a single access point for all mail. Once a single access point is nominated there is no flexibility to access bulk mail services at any other access point.

4.1 An Post Perspective

An Post claims that the current offering is all that can be done from an operational perspective. Its view is that the access is sufficient to meet customer needs as the major mail preparation companies are based in Dublin or Cork (apart from its own *PrintPost* subsidiary which is located in Portlaoise and Tallaght in Dublin).

The issue for ComReg is that An Post is obliged to provide a nationwide service under the 1983 Act²⁵. Section 12 provides

- “(1) The principal objects of the postal company shall be stated in its memorandum of association to be
- (a) to provide a national postal service within the State and between the State and places outside the State.

²² For example a service offered can take a day longer at those twenty locations than the same service available at the four principal access points

²³ Population being used as a proxy for potential demand

²⁴ Cork City, Swords, Carlow, Cellbridge, Leixlip, Tullamore, Balbriggan and Maynooth

²⁵ Postal and Telecommunications Services Act, 1983

- (b) to meet the industrial, commercial, social and household needs of the State for comprehensive and efficient postal services and, so far as the company considers reasonably practicable, to satisfy all reasonable demands for such services throughout the State”.

The difficulty is to reconcile this statutory obligation with the treatment of bulk/direct mail customers in cities such as Limerick, Galway, Waterford and large towns such as Drogheda and Sligo, compared with the more favourable treatment of customers located near An Post’s facilities in Athlone and Portlaoise.

There are two aspects to this matter, the first being the easier to resolve:

- whether customers who wish to post bulk / direct mail at the 20 locations with restrictive access conditions, or in the major centres where there is no access, should be given access to these services on the same basis as customers in Dublin (Knockmitten), Cork (Little Island), Athlone and Portlaoise.
- whether customers should be able to access the pre-sort services at a number of locations, as near to the delivery office as possible, so that they can avoid the delays that sometimes seem to occur between the current limited range of access points and the delivery office.

4.2 Meeting Customer Needs

An Post has publicly committed in its Annual Report²⁶ to meeting the needs of its customers and has stated “*In the changed market place of today, we must ensure that the products and services we offer remain relevant to the lives and businesses of all our customers*”. Bulk Mail Users are major customers of An Post and clearly there has to be an improvement from four access points, to ensure these customers have a choice of locations that are relevant to their business needs.

ComReg is mindful that current access points may not be optimally located from a customer perspective, particularly for customers who would have greater choice in structuring their operations if they could produce bulk mail that could be delivered to a local access point. This also applies to customers who use other means of communication but would consider the use of mail if full access to the bulk mail service was available locally.

ComReg has received formal complaints from customers over the past two years expressing concern that access to the postal system for bulk mail does not meet their needs. The following extract from a customer’s complaint indicates the difficulties in attempting to access discounts for posting in bulk, if a customer is not based close to one of the An Post’s four access points :

²⁶ Annual Report 2005 Chief Executive’s Review

“... we have been advised by An Post that no discounts are available to . . . for next day delivery if our post is delivered to our local Post office [by the poster]. . . We have met representatives from An Post over the last 12 months and we have been informed that the issue is non negotiable.

It would appear that provincial companies are being discriminated against in terms of potential postal discounts. While the development of a[n] “universal postal service” is a key function of your office, it seems unfair that provincial companies cannot avail of similar discounts as our Dublin based competitors”

A key matter for ComReg is how to nominate a number of access points without the specific insight of customer requirements nationwide.

4.3 ComReg Issues

There are a number of potential benefits in issuing a direction to An Post to offer more access points nationwide to bulk mail customers.

4.3.1 Discrimination Issue Addressed

ComReg is mindful of discrimination and the duties of dominant postal operators²⁷ and in this regard recognises that local authorities, health services, government departments and private industry at regional locations should be offered the same opportunities to structure their mailings as those operating in Dublin or Cork. It can be argued that certain large volume mailers, due to their geographical location, can only buy restricted postal services; this may impact their ability to compete with those offering similar services whilst availing of a complete range of bulk mail discounts due to their location close to one of the existing four mail centres.

4.3.2 Volume Growth

Increasing the number of access points, or offering multiple access points, could encourage bulk mailers to increase the usage of the relevant discounted services. This may also have ‘spin-off’ benefits for mailers who wish to only target audiences based in certain geographic areas. Volume growth could make any cost of providing the universal service more viable for An Post.²⁸

²⁷ 98/C39/02 Notice from the Commission on the application of the competition rules to the postal sector and on the assessment of certain State measures relating to postal services – Para 2.6 seq.

²⁸ The relationship between volume and costs is well documented. See for example “The impact on Universal service of the full market accomplishment of the postal internal market in 2009” (PricewaterhouseCoopers for the European Commission- May 2006), in particular section 2.2.1.2 copy available at http://ec.europa.eu/internal_market/post/studies_en.htm and “The Role of Scale Economies in the Cost Behaviour of Posts” Robert H. Cohen. December 15, 2004 copy available at <http://www.prc.gov/> papers PRC Staff.

4.3.3 Quality of Service

Any migration of mail, from processing through the main An Post centres toward presentation at delivery offices, should have a positive impact on quality, given that mail items would be delivered at a much closer point to their production thereby reducing volumes transiting An Post's four mail hubs.

4.3.4 Customer Operations

Some customers who post mail in bulk on a nationwide basis have argued that the ability to print locally on a distributed basis and then inject into the postal network in the same locations would be beneficial.

Customers have also argued that if access was provided at delivery office level, provided that mail was sorted for delivery to addresses for that specific delivery office, then an industrial dispute in any one location or area would not impact on their ability to access services available in other areas.

4.4 Indicative Locations and Density of Access Points

ComReg must now bring together the work that has developed since 2002 when it raised the issue of bulk mail access in the consultation on the universal service obligation²⁹ and present an indicative list of locations that might be available to bulk mail users.

The list is based on the twenty-four acceptance locations that currently accept pre-sorted and deferred delivery for postings of between 500 and 2000 items.

The list has been extended by a further twenty-four locations to cater for those counties and large towns not currently represented.

The list of locations in Table 1 below is merely indicative and is aimed at facilitating all interested parties in their consideration of where An Post should provide access to bulk mail services on a non discriminatory basis.

²⁹ ODTR 02/95 Regulation of Postal Services - Universal Service Obligation, Tariff Principles and miscellaneous issues,

TABLE 1 – INDICATIVE BULK MAIL ACCESS POINTS FOR FULL RANGE OF DISCOUNTED SERVICES

	County Council Administrative Area	City / Town	2002 Population of city / town	Current Access for Bulk Mail	National Spatial Strategy *
1	Dublin City	Dublin (Cardiff Lane)	Dublin City and Environs 1,004,614	RESTRICTED	Gateway
2	Dun Laoghaire-Rathdown	Sandyford Industrial Estate		NONE	
3	South County Dublin	Dublin Mail Centre (Knockmitten)		FULL	
4	Fingal	Swords	27,175	NONE	
5		Balbriggan	10,294	NONE	Primary Development Centre
6	Cork City	Cork - City	Cork City and Environs 186,239	NONE	Gateway
7	Cork County	Cork Mail Centre– Little Island		FULL	
8		Mallow	8,937	NONE	Hub
9	Limerick city & county	Limerick	86,998	RESTRICTED	Gateway
10	Galway city & county	Galway	66,163	RESTRICTED	Gateway
11		Tuam	5,947	NONE	Hub
12	Waterford city & county	Waterford	46,736	RESTRICTED	Gateway
13		Dungarvan	7,452	NONE	County Town
14	Louth	Dundalk	32,505	RESTRICTED	Gateway
15		Drogheda	31,020	RESTRICTED	Primary Development Centre
16	Wicklow	Bray	30,951	RESTRICTED	
17		Greystones	11,913	NONE	
18		Wicklow	9,355	NONE	Primary Development Centre
19	Clare	Ennis	22,051	RESTRICTED	Hub
20	Kerry	Tralee	21,987	RESTRICTED	Hub
21		Killarney	13,137	NONE	Hub
22	Kilkenny	Kilkenny	20,735	RESTRICTED	Hub
23	Sligo	Sligo	19,735	RESTRICTED	Gateway
24	Meath	Navan	19,417	RESTRICTED	Primary Development Centre
25	Carlow	Carlow	18,487	NONE	County Town
26	Kildare	Naas	18,288	RESTRICTED	Primary Development Centre
27		Droichead Nua	16,739	NONE	Primary Development Centre
28		Cellbridge	16,016	NONE	
29		Leixlip	15,016	NONE	
30		Maynooth	10,151	NONE	
31		Kilcullen	1,483	NONE	Primary Development Centre

	County Council Administrative Area	City / Town	2002 Population of city / town	Current Access for Bulk Mail	National Spatial Strategy *
32	Wexford	Wexford	17,235	RESTRICTED	Hub
33	Tipperary SR	Clonmel	16,910	RESTRICTED	County Town
34	Westmeath	Athlone Mail Centre	15,936	FULL	Gateway
35		Mullingar	15,621	NONE	Gateway
36	Donegal	Letterkenny	15,231	RESTRICTED	Gateway
37		Lifford	1,395	NONE	County Town
38	Laois	Portlaoise Mail Centre	12,127	FULL	County Town
39	Mayo	Castlebar	11,371	RESTRICTED	Hub
40		Ballina	9,647	NONE	Hub
41	Offaly	Tullamore	11,098	NONE	Gateway
42	Longford	Longford	7,557	RESTRICTED	County Town
43	Tipperary NR	Thurles	7,425	NONE	See Note 1
44		Nenagh	6454	NONE	County Town
45	Cavan	Cavan	6,098	RESTRICTED	Hub
46	Monaghan	Monaghan	5,936	NONE	Hub
47	Roscommon	Roscommon	4,489	RESTRICTED	County Town
48	Leitrim	Carrick-on-Shannon	2,237	NONE	County Town

Note 1 – Thurles is not a designated town but is larger than Nenagh which is designated as the county town

4.5 Summary

4.5.1 General Access Points

The general access points should be reflective of the needs of postal users, while capable of being served by An Post. The following consultation issues arise:

Q. 1. Is the indicative list of general access points adequate to meet the needs of customers who wish to avail of the bulk mail service or would fewer access points suffice?

Q. 2. Is the indicative list of general access points capable of being served by An Post or would there be particular difficulties at specific locations?

Q. 3. Are there any other locations not included on the indicative list, and which regularly generate significant bulk mail volumes, that should be included? If YES please provide details

4.5.2 Multiple Access Points

The current system restricts postal users to a single bulk mail access point. It is not clear whether this arrangement is sufficient to meet the needs of postal users. The following consultation issues therefore arise:

Q. 4. Is the current system offered by An Post, whereby the customer has to agree in advance the access point location through which all bulk mail will be processed, sufficient to meet the needs of all postal users? Please give reasons for your answer

Q. 5. Is there demand from postal users for An Post to provide access to a pre sorted service at multiple points nationwide?

4.5.3 Periodic Review

The final list of Access Points will be subject to periodic review by ComReg in line with customer demand. This will ensure that the range of access points continues to meet the needs of customers in line with ComReg's statutory obligation³⁰ whilst also ensuring that An Post does not have to provide services for which there is no demand.

4.6 Questions specifically for An Post

An Post has previously argued against the extension of bulk mail access on the basis that the current offering is all that can be provided from an operational perspective. ComReg requests An Post to provide reliable and exact information in support of its position. In this regard, ComReg invites An Post to respond to the following question:

³⁰ SI No 616 of 2002 Regulation 4 (1) (b)

Q. 6. Question for An Post only

(a) Exactly how does the depositing of pre-sort Bulk Mail at An Post Delivery Offices negatively impact An Post's current operations?

(b) What would be the extent of those effects, in terms of costs, labour and efficiencies?

(c) What measures could be taken to curb, minimise or counteract those effects?

Please provide detailed answers, addressing each of the indicative locations where necessary.

5 Submitting Comments

All comments are welcome; however it would make the task of analysing responses easier if comments were referenced to the relevant question numbers from this document.

The consultation period will run from 26 September 2006 to 31 October 2006 during which the Commission welcomes written comments on any of the issues raised in this paper.

Having analysed and considered the comments received, ComReg will review the bulk mail access matters raised in the consultation and publish before the end of the year a report on the consultation which will, inter alia summarise the responses to the consultation.

In order to promote further openness and transparency, ComReg will publish all respondents' submissions to this consultation, subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24. We would request that electronic submissions be submitted in an-unprotected format so that they can be appended into the ComReg submissions document for publishing electronically.

Confidentiality

ComReg appreciates that many of the issues raised in this paper may require respondents to provide confidential information if their comments are to be meaningful.

As it is ComReg's policy to make all responses available on its web-site and for inspection generally, respondents to consultations are requested to clearly identify confidential material and place confidential material in a separate annex to their response

Such Information will be treated subject to the provisions of ComReg's guidelines on the treatment of confidential information – ComReg 05/24 at www.comreg.ie

Appendix A – Consultation Questions

List of Questions

- Q. 1. Is the indicative list of general access points adequate to meet the needs of customers who wish to avail of the bulk mail service or would fewer access points suffice? 15
- Q. 2. Is the indicative list of general access points capable of being served by An Post or would there be particular difficulties at specific locations?..... 15
- Q. 3. Are there any other locations not included on the indicative list, and which regularly generate significant bulk mail volumes, that should be included? If YES please provide details 16
- Q. 4. Is the current system offered by An Post, whereby the customer has to agree in advance the access point location through which all bulk mail will be processed, sufficient to meet the needs of all postal users? Please give reasons for your answer 16
- Q. 5. Is there demand from postal users for An Post to provide access to a pre sorted service at multiple points nationwide?..... 16
- Q. 6. Question for An Post only
.....
(a) Exactly how does the depositing of pre-sort Bulk Mail at An Post Delivery Offices negatively impact An Post’s current operations?
.....
(b) What would be the extent of those effects, in terms of costs, labour and efficiencies?
.....
(c) What measures could be taken to curb, minimise or counteract those effects? Please provide detailed answers, addressing each of the indicative locations where necessary. 17