



Commission for
Communications Regulation

Repeal of price cap control for universal postal services – publication of correspondence

Information Notice

Reference: 17/18s

Date: 21 March 2017

An Coimisiún um Rialáil Cumarsáide

Commission for Communications Regulation

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1. Letter from An Post dated 10 February 2017
2. Response from ComReg dated 14 February 2017

1 Letter from An Post dated 10 February 2017

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Highly Confidential

Kevin O'Brien
Commissioner
ComReg
Block DEF
Abbey Court
Irish Life Centre
Lower Abbey Street
Dublin 1
D01 W2H4



10 February 2017

Reference: An Post Tariff Changes

Dear Kevin

As you are aware, the Communications Regulation (Postal Services) (Amendment) Bill 2016, which will repeal Section 30 of the Communications Regulation (Postal Services) Act 2011 ("the 2011 Act") is progressing through the Oireachtas. In order to address the significant losses incurred in the mails business and to continue trading An Post must urgently implement a range of significant price increases. Failure to have immediate price increases in place will lead to An Post being unable to ensure the continued availability of the Universal Postal Service. Therefore the timely implementation of the proposed price increases is imperative.

We enclose the new An Post prices for USO services which we propose to implement once the legislation has been enacted and following the statutory requirement to give customers notice of changes in tariffs. Notice will be issued via the communication channels as observed by An Post for previous price changes e.g. the An Post website, national newspaper advertisements, issue of Schedule of Charges, etc. New prices for non-USO services are also provided for information.

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The attached schedule of prices including a headline postage rate of €1.00 is compliant with the Tariff Principles set out in Section 28 of the 2011 Act and consistent with An Post's obligations to secure the future of the Universal Postal Service pursuant to Section 21(1) of the 2011 Act, for the reasons outlined below:

- **Affordability:**

We believe that the new prices will be affordable for all customers including personal users and SMEs. We note ComReg's views expressed in Decision 14/59 that "*price increases are unlikely to cause affordability issues for residential postal service users, who generally send relatively low volumes of post*" and that affordability should be assessed separately for residential users and SMEs.

The conclusions of Ofcom on the affordability of recent price increases by Royal Mail are also relevant. An Post's proposed percentage increase to the headline postage rate (39%) is in line with Royal Mail's initial increase after it was granted pricing freedom in 2012 and Royal Mail made further increases of up to 10% between 2012 and 2016. Ofcom has reviewed the affordability of these increases regularly, including most recently in November 2016¹, and has consistently concluded that prices remain affordable.

(i) Affordability for residential users

Average consumer spend on postal services is negligible, CSO publications show that spending on postal services constitute a very small part of total household spending, making up less than 0.15% of CPI calculations in 2016.

Publicly available data (Deutsche Post report of March 2016²) shows that An Post's headline postage rate at €0.72 is significantly lower than the nominal EU15 average of €1.00. This data is almost one year old and the updated average is now €1.07 moving to €1.09 with An Post's increase to €1.00, Ireland's postal rates continue to be well below the EU15 average.

In addition to a nominal rates comparison, the Deutsche Post report uses the measure of "Work minutes per letter price" as a benchmark of affordability.

¹ www.ofcom.org.uk/__data/assets/pdf_file/0029/94961/2015-16-Annual-Report.pdf

² www.dpdhl.com/en/media_relations/media_library/documents/letter_price_survey_europe.html

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The EU15 average in March 2016 was 2.67 minutes with the rate for Ireland considerably lower at 1.63 minutes. When updated for the rates applicable from March 2017 Ireland's rate moves to 2.33 minutes and continues to be well below the updated EU15 average of 2.84 minutes.

(ii) Affordability for SMEs

The attached schedule of prices includes significant discounts for metered mail. Specifically, An Post's new payment method discounts move from 4c to 10c for Meter customers, reflecting the need to ensure that the universal postal service remains affordable for businesses/SMEs. In addition to this, the new pricing includes a significant increase in the discount provided for the purchase of 2x100 stamp rolls from €4 to €10 for domestic letters and from €6 to €12 for international letters.

These discounts meet the affordability needs of businesses/SMEs who generally send higher volumes of post than residential users. In addition, the above-described evidence of the proposed prices being below the EU15 average provides further evidence of their affordability for SMEs.

- **Cost-orientated:**

The new tariffs for Universal Postal Services will be cost-oriented and take account of and reflect the costs of providing the services. This is especially the case for stamped letter traffic which clearly showed significant unit losses with unit costs of €0.86 in 2015 compared to unit revenue of €0.70 in 2015, as reported in the 2015 An Post Regulatory Financial Statements ("RFS"). When 2015 unit costs are adjusted for 2016 factors, including volume decline³, Labour Court pay awards and inclusion of a reasonable profit margin⁴, estimated unit costs in 2016 are at €0.99 (including profit margin) as per Table 1 below. Furthermore, the most relevant unit costs are those for 2017 and Table 2 overleaf shows An Post's current projection that this will be €1.10 (including profit margin).

³ As per An Post's response of 28/10/16 to ComReg (Appendix 1) as part of PCM interim review, updated for latest information available

⁴ As per An Post's response of 28/10/16 to ComReg (Appendix 3) as part of PCM interim review

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Table 1

2016 Estimated Unit Cost	
Unit Cost - 2015	€ 0.86
Estimated volume decline	5%
Company costs, inc. pay awards	1.4%
Estimated unit cost - 2016	€ 0.92
Appropriate Profit Margin	7.5%
Estimated unit cost including margin - 2016	€ 0.99

Table 2

2017 Estimated Unit Cost	
Unit Cost - 2016	€ 0.92
Estimated volume decline	10%
Company costs, inc. pay awards	1.0%
Estimated unit cost - 2017	€ 1.02
Appropriate Profit Margin	7.5%
Estimated unit cost including margin - 2017	€ 1.10

- **Uniform Tariff:**

There is no proposal to change the uniformity of tariffs.

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- **Transparency and Non-Discrimination:**

Tariffs are clearly shown to be transparent and non-discriminatory, particularly addressing the variance in unit costs by payment type, Stamped, Meter and Bulk. Analysis of the 2015 RFS shows the following:

Extract from 2015 RFS - Domestic

	Stamped Letters		Meter Letters		Disc. 6 Letters	
	2015 ('000)	2014 ('000)	2015 ('000)	2014 ('000)	2015 ('000)	2014 ('000)
Volume	71,343	76,333	75,767	83,341	74,184	142,443
Cost	€ 61,547	€ 62,015	€ 52,585	€ 55,465	€ 40,051	€ 73,670
Unit Cost	€ 0.86	€ 0.81	€ 0.69	€ 0.67	€ 0.54	€ 0.52
Vs. Stamped			(€0.17)	(€0.15)	(€0.32)	(€0.30)

An Post's proposed rates of €1.00 for Stamps, €0.90 for Meter and €0.60 for Bulk Discount 6 clearly reflects the difference in costs between these three significant streams of traffic, this is in line with the principles of transparency and non-discrimination as well as the principle of cost-orientation.

- **Special Tariffs:**

There is no proposal to change the Terms and Conditions to access the services at the new tariffs.

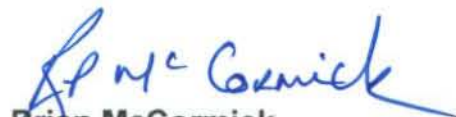
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Sustaining the Provision of the USO

As the Designated Universal Postal Service Provider An Post is obliged to continue to provide a service in accordance with Section 21(1) of the 2011 Act. An Post has had regard to the view expressed by ComReg that price increases will accelerate volume decline but is confident, based on detailed analysis, including the data provided in the Indecon report⁵, that the proposed price increases are the best way of sustaining USO provision. The proposed price increases have been determined taking into account the need to secure the future of the Universal Postal Service in circumstances where (i) volumes are falling and will continue to fall due to general market decline, and (ii) current losses mean that significant changes must be made if the Company is to continue to be able to provide a Universal Postal Service.

Due to the severe cash position of An Post, and to ensure continued provision of the USO, An Post intends to publish price increases immediately following the signing, by the Minister, of the commencement order for the Amending Act and implement the increase following the statutory notice period to customers. An Post will of course be happy to discuss any aspects of the proposed tariffs with you and your officials.

Yours sincerely



Brian McCormick
Services Director

⁵ Indecon report "Estimates of own price elasticity of demand in support of An Post's price cap review" provided to ComReg on 30 November 2016

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Appendix 1: Domestic & Northern Ireland Standard Charges - USO

Domestic & Northern Ireland Published Tariff USO	Current Tariff	Proposed Tariff	Increase	% Increase
Letters				
0-100g				
Stamped	€0.72	€1.00	€0.28	38.9%
Metered and Business Reply	€0.68	€0.90	€0.22	32.4%
Large Envelopes (Stamped)				
0-100g	€1.30	€1.65	€0.35	26.9%
100-250g	€1.75	€2.10	€0.35	20.0%
250-500g	€2.35	€2.80	€0.45	19.1%
Large Envelopes (Metered and Business Reply)				
0-100g	€1.25	€1.55	€0.30	24.0%
100-250g	€1.70	€2.00	€0.30	17.6%
250-500g	€2.30	€2.70	€0.40	17.4%
Packets (Stamped)				
0-100g	€2.85	€3.30	€0.45	15.8%
100-250g	€3.55	€4.10	€0.55	15.5%
250-500g	€4.55	€5.25	€0.70	15.4%
500g-1kg	€7.05	€8.00	€0.95	13.5%
1-2kg	€8.30	€9.00	€0.70	8.4%
Packets (Metered and Business Reply)				
0-100g	€2.75	€3.10	€0.35	12.7%
100-250g	€3.45	€3.90	€0.45	13.0%
250-500g	€4.45	€5.05	€0.60	13.5%
500g-1kg	€6.95	€7.80	€0.85	12.2%
1-2kg	€8.20	€8.80	€0.60	7.3%

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Appendix 2: Outbound International Standard Charges - USO

Letters	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-100g	€1.10	€1.35	€1.10	€1.35	€1.10	€1.35

Large Envelopes	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-100g	€2.15	€2.50	€2.15	€2.50	€2.15	€2.50
100-250g	€3.80	€4.25	€3.80	€4.25	€3.80	€4.25
250-500g	€5.00	€5.50	€5.00	€5.50	€5.00	€5.50

Packets	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
0-100g	€4.00	€4.50	€4.00	€4.50	€4.00	€4.50
100-250g	€5.00	€5.50	€5.00	€5.50	€5.00	€5.50
250-500g	€6.00	€6.50	€6.00	€6.50	€6.00	€6.50
500g-1kg	€8.50	€9.00	€8.50	€9.00	€11.75	€12.25
1-2kg	€11.75	€12.25	€11.75	€12.25	€18.00	€18.50

Sending Books Abroad	Zone 2		Zone 3		Zone 4	
	Current	Proposed	Current	Proposed	Current	Proposed
3kg	€17.00	€19.00	€17.00	€19.00	€19.50	€21.50
4kg	€22.50	€25.50	€22.50	€25.50	€25.50	€28.00
5kg	€28.00	€31.00	€28.00	€31.00	€30.50	€33.50

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Appendix 3: Domestic Discounts Charges - USO

Letters	100g Letter			
	Current	Proposed	Increase	% Increase
Mail Presented at Mail Centres or Designated Acceptance Offices				
Discount 6 - Deferred processing before noon +85% autosort	€0.52	€0.60	€0.08	15.4%
Discount 9 - PreSort (151 Sorts) before 5.30pm	€0.57	€0.67	€0.10	17.5%

Large Envelopes	100g Large Envelopes				250g Large Envelopes				500g Large Envelopes			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
Mail Presented at Mail Centres or Designated Acceptance Offices												
Discount 6 - Deferred processing before noon +85% autosort	€1.02	€1.20	€0.18	17.5%	€1.38	€1.62	€0.24	17.5%	€1.93	€2.27	€0.34	17.5%
Discount 9 - PreSort (151 Sorts) before 5.30pm	€1.08	€1.27	€0.19	17.5%	€1.55	€1.82	€0.27	17.5%	€2.08	€2.44	€0.36	17.5%

Packets	100g Packet				250g Packet				500g Packet				1kg Packet			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
Mail Presented at Mail Centres or Designated Acceptance Offices																
Discount 7 - Deferred Processing before noon	€2.60	€2.93	€0.33	12.5%	€3.34	€3.76	€0.42	12.5%	€4.35	€4.89	€0.54	12.5%	€6.48	€7.29	€0.81	12.5%
Discount 9 - PreSort (151 Sorts) before 5.30pm	€2.54	€2.86	€0.32	12.5%	€3.26	€3.67	€0.41	12.5%	€4.25	€4.78	€0.53	12.5%	€6.23	€7.01	€0.78	12.5%

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Appendix 4: Registered/POD & Insured Charges - USO

Domestic & Northern Ireland	Current Tariff	Proposed Tariff	Increase	% Increase
Letters, Large Envelopes and Packets				
0g-100g	€6.25	€7.00	€0.75	12.0%
100g-250g	€6.75	€7.50	€0.75	11.1%
250g-500g	€7.75	€8.50	€0.75	9.7%
500g-1kg	€10.75	€11.50	€0.75	7.0%
1kg-2kg	€12.90	€14.00	€1.10	8.5%

International Outbound Zone 2	Letter				Large Envelope				Packet			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
0-100g	€6.25	€7.50	€1.25	20.0%	€7.20	€8.50	€1.30	18.1%	€9.05	€10.75	€1.70	18.8%
100-250g					€8.85	€10.50	€1.65	18.6%	€10.05	€11.75	€1.70	16.9%
250-500g					€10.05	€11.75	€1.70	16.9%	€11.05	€13.00	€1.95	17.6%
500g-1kg									€13.55	€16.00	€2.45	18.1%
1-2kg									€16.80	€19.75	€2.95	17.6%

International Outbound Zone 3	Letter				Large Envelope				Packet			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
0-100g	€6.25	€7.50	€1.25	20.0%	€7.20	€8.50	€1.30	18.1%	€9.05	€10.75	€1.70	18.8%
100-250g					€8.85	€10.50	€1.65	18.6%	€10.05	€11.75	€1.70	16.9%
250-500g					€10.05	€11.75	€1.70	16.9%	€11.05	€13.00	€1.95	17.6%
500g-1kg									€13.55	€16.00	€2.45	18.1%
1-2kg									€16.80	€19.75	€2.95	17.6%

International Outbound Zone 4	Letter				Large Envelope				Packet			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
0-100g	€6.25	€7.50	€1.25	20.0%	€7.20	€8.50	€1.30	18.1%	€9.05	€10.75	€1.70	18.8%
100-250g					€8.85	€10.50	€1.65	18.6%	€10.05	€11.75	€1.70	16.9%
250-500g					€10.05	€11.75	€1.70	16.9%	€11.05	€13.00	€1.95	17.6%
500g-1kg									€16.80	€19.75	€2.95	17.6%
1-2kg									€23.05	€27.25	€4.20	18.2%

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Appendix 5: Parcel Charges - USO

Published Tariff	Domestic and Northern Ireland - Zone 1			Zone 2			Zone 3			Zone 4																																																																																																																																																																																																																																																																																																																													
	Current Tariff	Proposed Tariff	% Increase	Current Tariff	Proposed Tariff	% Increase	Current Tariff	Proposed Tariff	% Increase	Current Tariff	Proposed Tariff	% Increase																																																																																																																																																																																																																																																																																																																											
Parcels													0-1000g	€7.05	€8.00	13.5%	€20.60	€22.50	€1.90	9.2%	€25.60	€28.00	€2.40	9.4%	€28.00	€2.40	9.4%	1000-1500g	€8.30	€9.00	8.4%	€24.50	€27.00	€2.40	9.8%	€30.60	€33.50	€2.90	9.5%	€33.50	€2.90	9.5%	1500-2000g	€8.30	€9.00	8.4%	€28.10	€31.00	€2.90	10.3%	€32.60	€35.50	€2.90	8.9%	€35.50	€2.90	8.9%	2000-2500g	€10.10	€11.00	8.9%	€30.00	€33.50	€3.50	9.5%	€36.00	€40.00	€4.00	9.3%	€40.00	€3.40	9.3%	2500-3000g	€10.10	€11.00	8.9%	€34.60	€38.00	€3.40	9.8%	€40.60	€44.00	€3.40	8.4%	€44.00	€3.40	8.4%	3000-3500g	€12.60	€13.50	7.1%	€36.60	€40.00	€3.40	9.3%	€46.60	€52.00	€5.40	11.6%	€52.00	€5.40	11.6%	3500-4000g	€12.60	€13.50	7.1%	€38.00	€42.50	€4.50	10.1%	€50.00	€57.00	€7.00	12.6%	€57.00	€7.00	12.6%	4000-4500g	€14.60	€15.50	6.2%	€40.60	€44.50	€3.90	9.6%	€55.60	€62.00	€6.40	11.5%	€62.00	€6.40	11.5%	4500-5000g	€14.60	€15.50	6.2%	€42.60	€46.50	€3.90	9.2%	€60.60	€67.00	€6.40	10.6%	€67.00	€6.40	10.6%	Each Additional 1kg	€1.00	€1.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€0.00	0.0%	Registered Parcels															0-1000g	€11.10	€12.00	8.1%	€25.60	€30.00	€4.40	17.2%	€30.60	€36.00	€5.40	17.6%	€36.00	€5.40	17.6%	1000-1500g	€12.90	€14.00	8.5%	€26.60	€35.00	€8.40	18.2%	€35.60	€42.00	€6.40	18.0%	€42.00	€6.40	18.0%	1500-2000g	€12.90	€14.00	8.5%	€33.10	€39.00	€5.90	17.8%	€37.60	€44.00	€6.40	17.0%	€44.00	€6.40	17.0%	2000-2500g	€14.60	€16.00	9.6%	€35.60	€42.00	€6.40	18.0%	€41.60	€49.00	€7.40	17.8%	€49.00	€7.40	17.8%	2500-3000g	€14.60	€16.00	9.6%	€39.60	€46.50	€6.90	17.4%	€45.60	€53.50	€7.90	17.3%	€53.50	€7.90	17.3%	3000-3500g	€17.10	€18.50	8.2%	€41.00	€49.00	€8.00	17.8%	€51.60	€60.50	€8.90	17.2%	€60.50	€8.90	17.2%	3500-4000g	€17.10	€18.50	8.2%	€43.60	€51.00	€7.40	17.0%	€55.60	€65.25	€9.65	17.4%	€65.25	€9.65	17.4%	4000-4500g	€19.10	€20.50	7.3%	€45.60	€53.50	€7.90	17.3%	€60.60	€71.25	€10.65	17.6%	€71.25	€10.65	17.6%	4500-5000g	€19.10	€20.50	7.3%	€47.60	€55.50	€7.90	16.6%	€65.60	€77.00	€11.40	17.4%	€77.00	€11.40	17.4%	Each Additional 1kg	€1.00	€1.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€0.00	0.0%
0-1000g	€7.05	€8.00	13.5%	€20.60	€22.50	€1.90	9.2%	€25.60	€28.00	€2.40	9.4%	€28.00	€2.40	9.4%																																																																																																																																																																																																																																																																																																																									
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4500-5000g	€14.60	€15.50	6.2%	€42.60	€46.50	€3.90	9.2%	€60.60	€67.00	€6.40	10.6%	€67.00	€6.40	10.6%																																																																																																																																																																																																																																																																																																																									
Each Additional 1kg	€1.00	€1.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€0.00	0.0%																																																																																																																																																																																																																																																																																																																									
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Each Additional 1kg	€1.00	€1.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€1.00	€0.00	0.0%	€1.00	€0.00	0.0%																																																																																																																																																																																																																																																																																																																									

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Appendix 6: Redirection & MailMinder Services - USO

Redirection Service

Duration	Residential - In Ireland (Fee per redirection)				Residential - Abroad (Fee per redirection)				Business - In Ireland (Fee per redirection)				Business - Abroad (Fee per redirection)			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
Up to 3 months	€75.00	€80.00	€5.00	6.7%	€95.00	€100.00	€5.00	5.3%	€150.00	€155.00	€5.00	3.3%	€190.00	€195.00	€5.00	2.6%
Up to 6 months	€100.00	€105.00	€5.00	5.0%	€150.00	€155.00	€5.00	3.3%	€190.00	€195.00	€5.00	2.6%	€270.00	€275.00	€5.00	1.9%
Up to 12 months	€135.00	€140.00	€5.00	3.7%	€180.00	€185.00	€5.00	2.8%	€270.00	€275.00	€5.00	1.9%	€350.00	€355.00	€5.00	1.4%

MailMinder Service

Duration	Per Address			
	Current	Proposed	Increase	% Increase
Less than 4 weeks	€50.00	€52.50	€2.50	5.0%
4 to 8 weeks	€70.00	€75.00	€5.00	7.1%
8 to 12 weeks	€105.00	€110.00	€5.00	4.8%

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Appendix 7: Domestic Bulk Discounts - Non USO

Letters (0 - 100g)	100g Letter			
	Current	Proposed	Increase	% Increase
Fully Paid	€0.70	€0.90	€0.20	28.6%
Mail Presented at Mail Centres				
Discount 1 - Presentation before noon auto-processing	€0.67	€0.67	€0.10	17.5%
Discount 2 - Deferred Processing before noon auto-processing	€0.55	€0.65	€0.10	18.2%
Discount 3 - Presentation before noon 85%+ autosort	€0.56	€0.66	€0.10	17.9%
Discount 4 - Presentation before 3pm 85%+ autosort	€0.57	€0.67	€0.10	17.5%
Discount 5 - Presentation before 3pm	€0.59	€0.79	€0.20	33.9%
Mail Presented at Mail Centres or Designated Acceptance Offices				
Discount 7 - Deferred Processing before noon	€0.61	€0.71	€0.10	16.4%
Discount 8 - Pre sorted (151 sorts) before noon	€0.56	€0.66	€0.10	17.9%
Discount 10 - Deferred Processing before noon auto-processing	€0.56	€0.66	€0.10	17.2%
Mail Presented at Mail Centres in Volumes of 5,000 items Upwards				
Discount 11 - Deferred (2 days) Presentation before noon 95%+ auto-sort	€0.50	€0.57	€0.07	14.0%

Large Envelopes	100g Large Envelopes				250g Large Envelopes				500g Large Envelopes			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
Fully Paid	€1.25	€1.55	€0.30	24.0%	€1.70	€2.00	€0.30	17.6%	€2.30	€2.70	€0.40	17.4%
Mail Presented at Mail Centres												
Discount 1 - Presentation before noon auto-processing	€1.11	€1.30	€0.19	17.5%	€1.53	€1.80	€0.27	17.5%	€2.09	€2.46	€0.37	17.5%
Discount 2 - Deferred Processing before noon auto-processing	€1.08	€1.27	€0.19	17.5%	€1.50	€1.76	€0.26	17.5%	€2.07	€2.43	€0.36	17.5%
Discount 3 - Presentation before noon 85%+ autosort	€1.08	€1.27	€0.19	17.5%	€1.50	€1.76	€0.26	17.5%	€2.07	€2.43	€0.36	17.5%
Discount 4 - Presentation before 3pm 85%+ autosort	€1.10	€1.29	€0.19	17.5%	€1.52	€1.79	€0.27	17.5%	€2.09	€2.46	€0.37	17.5%
Discount 5 - Presentation before 3pm	€1.16	€1.46	€0.30	25.9%	€1.60	€1.90	€0.30	18.8%	€2.20	€2.60	€0.40	18.2%
Mail Presented at Mail Centres or Designated Acceptance Offices												
Discount 7 - Deferred Processing before noon	€1.16	€1.36	€0.21	17.5%	€1.63	€1.92	€0.29	17.5%	€2.23	€2.62	€0.39	17.5%
Discount 8 - Pre sorted (151 sorts) before noon	€1.07	€1.26	€0.19	17.5%	€1.53	€1.80	€0.27	17.5%	€2.08	€2.44	€0.36	17.5%
Discount 10 - Deferred Processing before noon auto-processing	€1.15	€1.35	€0.20	17.5%	€1.55	€1.82	€0.27	17.5%	€2.10	€2.47	€0.37	17.5%
Mail Presented at Mail Centres in Volumes of 5,000 items Upwards												
Discount 11 - Deferred (2 days) Presentation before noon 95%+ auto-sort	€0.99	€ 1.13	€0.14	14.0%	€1.35	€1.54	€0.19	14.0%	€1.90	€2.17	€0.27	14.0%

Packets	100g Packet				250g Packet				500g Packet				1kg Packet				2kg Packet			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
Fully Paid	€2.75	€3.10	€0.35	12.7%	€3.45	€3.90	€0.45	13.0%	€4.45	€5.05	€0.60	13.5%	€5.95	€7.80	€1.85	12.2%	€8.20	€8.80	€0.60	7.3%
Mail Presented at Mail Centres																				
Discount 5 - Presentation before 3pm	€2.58	€2.93	€0.35	13.6%	€3.32	€3.77	€0.45	13.6%	€4.34	€4.94	€0.60	13.8%	€5.36	€7.21	€1.85	13.4%				
Mail Presented at Mail Centres or Designated Acceptance Offices																				
Discount 5 - Pre sorted (151 sorts) before noon	€2.49	€2.80	€0.31	12.5%	€3.23	€3.63	€0.40	12.5%	€4.14	€4.66	€0.52	12.5%	€5.21	€6.99	€1.78	12.5%				

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Appendix 8: Express Post Domestic & International

Express Post - Zone 1 (Domestic & Northern Ireland)

Weight not over	Letter/Large Envelope/Packet				Parcel*			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
100g	€6.25	€7.25	€1.00	16.0%	€11.20	€12.50	€1.30	11.6%
250g	€7.95	€9.00	€1.05	13.2%	€11.20	€12.50	€1.30	11.6%
500g	€9.25	€10.25	€1.00	10.8%	€11.20	€12.50	€1.30	11.6%
1kg	€11.25	€12.25	€1.00	8.9%	€13.20	€14.00	€0.80	6.1%
1.5kg	€15.20	€16.25	€1.05	6.9%	€15.20	€16.00	€0.80	5.3%
2kg	€15.20	€16.25	€1.05	6.9%	€15.20	€16.00	€0.80	5.3%
2.5kg					€16.20	€18.00	€1.80	11.1%
3kg					€17.20	€18.00	€0.80	4.7%
3.5kg					€18.20	€20.50	€2.30	12.6%
4kg					€19.20	€20.50	€1.30	6.8%
4.5kg					€20.20	€22.50	€2.30	11.4%
5kg					€21.20	€22.50	€1.30	6.1%
Each Additional 1kg (max 20kg)					€1.00	€1.00	€0.00	0.0%

Express Post - Zone 2 (GB) and Zone 3 (Europe)

Weight not over	Letter/Large Envelope/Packet			
	Current	Proposed	Increase	% Increase
100g	€9.85	€11.00	€1.15	11.7%
250g	€10.85	€12.25	€1.40	12.9%
500g	€12.35	€14.00	€1.65	13.4%
1kg	€15.35	€17.25	€1.90	12.4%
1.5kg	€18.85	€21.25	€2.40	12.7%
2kg	€18.85	€21.25	€2.40	12.7%

Express Post - Zone 4 (Rest of the World)

Weight not over	Letter/Large Envelope/Packet			
	Current	Proposed	Increase	% Increase
100g	€9.85	€11.00	€1.15	11.7%
250g	€10.85	€12.25	€1.40	12.9%
500g	€12.35	€14.00	€1.65	13.4%
1kg	€18.35	€20.25	€1.90	10.4%
1.5kg	€25.35	€28.25	€2.90	11.4%
2kg	€25.35	€28.25	€2.90	11.4%

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Appendix 9: Postaim, Admailer.ie and Passport Express

Postaim

	2k - 75k				75k - 250k				250k - 500k				>500k			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
0-50g Letter/Postcard	€0.49	€0.56	€0.07	14.3%	€0.47	€0.54	€0.07	14.9%	€0.45	€0.52	€0.07	15.6%	€0.44	€0.51	€0.07	15.9%
0-50g Large Envelope	€0.86	€1.00	€0.14	16.1%	€0.84	€0.98	€0.14	16.5%	€0.82	€0.96	€0.14	16.9%	€0.82	€0.96	€0.14	16.9%
0-50g Packet	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%
51-100g Letter/Postcard	€0.55	€0.62	€0.07	12.7%	€0.53	€0.60	€0.07	13.2%	€0.51	€0.58	€0.07	13.7%	€0.50	€0.57	€0.07	14.0%
51-100g Large Envelope	€0.95	€1.09	€0.14	14.6%	€0.92	€1.06	€0.14	15.1%	€0.90	€1.04	€0.14	15.4%	€0.90	€1.04	€0.14	15.4%
51-100g Packet	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%	€2.49	€2.82	€0.33	13.3%
101-250g Large Envelope	€1.30	€1.49	€0.19	14.5%	€1.25	€1.44	€0.19	15.1%	€1.23	€1.42	€0.19	15.4%	€1.23	€1.42	€0.19	15.4%
101-250g Packet	€3.23	€3.66	€0.43	13.2%	€3.23	€3.66	€0.43	13.2%	€3.23	€3.66	€0.43	13.2%	€3.23	€3.66	€0.43	13.2%
251-500g Large Envelope	€1.52	€1.79	€0.27	17.5%	€1.47	€1.74	€0.27	18.1%	€1.44	€1.71	€0.27	18.5%	€1.44	€1.71	€0.27	18.5%
251-500g Packet	€4.14	€4.70	€0.56	13.5%	€4.14	€4.70	€0.56	13.5%	€4.14	€4.70	€0.56	13.5%	€4.14	€4.70	€0.56	13.5%
501-1kg Packet	€6.21	€7.02	€0.81	13.1%	€6.21	€7.02	€0.81	13.1%	€6.21	€7.02	€0.81	13.1%	€6.21	€7.02	€0.81	13.1%

Admailer.ie

	Current	Proposed	Increase	% Increase
Rate per item (Postcards)	€0.67	€0.94	€0.27	40.3%

Passport Express

Passport Express Fees	Current €	Proposed €	Increase	% Increase
Single Application	€9.50	€9.50	€0.00	0.0%
Up to four family applications	€16.00	€16.00	€0.00	0.0%

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Appendix 10: Business Response Services, Publication Services and Business Collections Services

Business Response Services

Weight not over	Letter/Postcard				Large Envelope				Packet				Parcel*			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
100g	€0.68	€0.90	€0.22	32.4%	€1.25	€1.55	€0.30	24.0%	€2.75	€3.10	€0.35	12.7%	€7.05	€8.00	€0.95	13.5%
250g					€1.70	€2.00	€0.30	17.8%	€3.45	€3.90	€0.45	13.0%	€7.05	€8.00	€0.95	13.5%
500g					€2.30	€2.70	€0.40	17.4%	€4.45	€5.05	€0.60	13.5%	€7.05	€8.00	€0.95	13.5%
1kg									€6.95	€7.80	€0.85	12.2%	€7.05	€8.00	€0.95	13.5%
1.5kg									€8.20	€8.80	€0.60	7.3%	€8.30	€9.00	€0.70	8.4%
2kg									€8.20	€8.80	€0.60	7.3%	€8.30	€9.00	€0.70	8.4%

License Fee	Current	Proposed	Increase	% Increase
Annual Licence Fee	€150.00	€165.00	€15.00	10.0%

Publication Services

Weight not over	Rate 1 (>100 items)				Rate 2 (>2,000 items)			
	Current Composite	Proposed Composite	Increase	% Increase	Current Composite	Proposed Composite	Increase	% Increase
250g	€1.05	€1.25	€0.20	19.0%	€0.95	€1.15	€0.20	21.1%
375g	€1.50	€1.75	€0.25	16.7%	€1.40	€1.65	€0.25	17.9%
500g	€1.85	€2.20	€0.35	18.9%	€1.70	€2.05	€0.35	20.6%
750g	€3.00	€3.55	€0.55	18.3%	€2.85	€3.40	€0.55	19.3%
1kg	€3.20	€3.80	€0.60	18.8%	€3.20	€3.80	€0.60	18.8%

Business Collection Services

Business Collections	Current	Proposed	Increase	% Increase
Annual Collection Fee	€2,800.00	€3,000.00	€200.00	7.1%
Fee per Special Collection	€50.00	€55.00	€5.00	10.0%

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Appendix 11: International Courier Post

Letter/ Large Envelope/ Packet/ Parcel	Zone 2				Zone 3								Zone 4				
	Current	Proposed	Increase	% Increase	EU				Non EU				Current	Proposed	Increase	% Increase	
					Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase					
Weight not over:																	
100g	€23.75	€31.50	€7.75	32.6%	€33.50	€43.00	€9.50	28.4%	€27.24	€46.50	€19.26	70.7%	€31.50	€49.00	€17.50	55.6%	
250g	€31.50	€31.50	€0.00	0.0%	€38.50	€43.00	€4.50	11.7%	€31.30	€46.50	€15.20	48.6%	€36.75	€49.00	€12.25	33.3%	
500g	€47.25	€31.50	(€15.75)	(33.3%)	€63.00	€43.00	(€20.00)	(31.7%)	€51.22	€46.50	(€4.72)	(9.2%)	€57.75	€49.00	(€8.75)	(15.2%)	
1kg	€52.50	€41.50	(€11.00)	(21.0%)	€70.00	€59.50	(€10.50)	(15.0%)	€56.91	€62.50	€5.59	9.8%	€68.25	€64.00	(€4.25)	(6.2%)	
1.5kg	€57.75	€44.50	(€13.25)	(22.9%)	€78.75	€63.50	(€15.25)	(19.4%)	€64.02	€66.50	€2.48	3.9%	€78.75	€68.50	(€10.25)	(13.0%)	
2kg	€63.00	€47.50	(€15.50)	(24.6%)	€84.00	€67.50	(€16.50)	(19.6%)	€68.29	€70.50	€2.21	3.2%	€84.00	€73.00	(€11.00)	(13.1%)	
2.5kg	€68.50	€50.50	(€18.00)	(26.3%)	€94.50	€71.50	(€23.00)	(24.3%)	€76.83	€74.50	(€2.33)	(3.0%)	€94.50	€77.50	(€17.00)	(18.0%)	
3kg	€73.50	€53.50	(€20.00)	(27.2%)	€99.75	€75.50	(€24.25)	(24.3%)	€81.10	€78.50	(€2.60)	(3.2%)	€105.00	€82.00	(€23.00)	(21.9%)	
3.5kg	€78.75	€56.50	(€22.25)	(28.3%)	€105.00	€79.50	(€25.50)	(24.3%)	€85.37	€82.50	(€2.87)	(3.4%)	€115.50	€86.50	(€29.00)	(25.1%)	
4kg	€84.00	€59.50	(€24.50)	(29.2%)	€112.50	€83.50	(€29.00)	(25.8%)	€91.46	€86.50	(€4.96)	(5.4%)	€126.00	€91.00	(€35.00)	(27.8%)	
4.5kg	€89.25	€62.50	(€26.75)	(30.0%)	€120.75	€87.50	(€33.25)	(27.5%)	€98.17	€90.50	(€7.67)	(7.8%)	€136.50	€95.50	(€41.00)	(30.0%)	
5kg	€94.50	€65.50	(€29.00)	(30.7%)	€131.25	€91.50	(€39.75)	(30.3%)	€106.71	€94.50	(€12.21)	(11.4%)	€141.75	€100.00	(€41.75)	(29.5%)	
Each Additional 1kg (max 20kg)	€5.00	€1.50	(€3.50)	(70.0%)	€12.00	€3.00	(€9.00)	(75.0%)	€9.76	€3.50	(€6.26)	(64.1%)	€15.00	€4.50	(€10.50)	(70.0%)	

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Appendix 12: Publicity Post

Standard Urban Rates per 1,000 (excluding VAT)

Weight not over	Up to 25,000 items				Up to 200,000 items				Up to 500,000 items				500,000+ items			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
20g	€104.30	€117.00	€12.70	12.2%	€94.35	€106.00	€11.65	12.3%	€83.47	€94.00	€10.53	12.6%	€78.96	€89.00	€10.04	12.7%
50g	€120.60	€136.00	€15.40	12.8%	€114.26	€129.00	€14.74	12.9%	€104.30	€117.00	€12.70	12.2%	€88.00	€99.00	€11.00	12.5%
75g	€125.12	€141.00	€15.88	12.7%	€120.60	€136.00	€15.40	12.8%	€114.27	€129.00	€14.73	12.9%	€99.78	€112.00	€12.22	12.2%
100g	€151.38	€170.00	€18.62	12.3%	€135.09	€152.00	€16.91	12.5%	€120.60	€136.00	€15.40	12.8%	€108.83	€122.00	€13.17	12.1%

Special Urban Rates per 1,000 (excluding VAT)

Weight not over	25,000+ items			
	Current	Proposed	Increase	% Increase
20g	€79.77	€90.00	€10.23	12.8%
50g	€103.98	€117.00	€13.02	12.5%
75g	€115.21	€130.00	€14.79	12.8%
100g	€129.04	€145.00	€15.96	12.4%

Rural Rates per 1,000 (excluding VAT)

Weight not over	Up to 25,000 items				Up to 200,000 items				Up to 500,000 items				500,000+ items			
	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase	Current	Proposed	Increase	% Increase
20g	€125.12	€141.00	€15.88	12.7%	€112.45	€127.00	€14.55	12.9%	€99.78	€112.00	€12.22	12.2%	€94.35	€106.00	€11.65	12.3%
50g	€144.14	€162.00	€17.86	12.4%	€136.89	€154.00	€17.11	12.5%	€125.12	€141.00	€15.88	12.7%	€105.21	€118.00	€12.79	12.2%
75g	€149.58	€168.00	€18.42	12.3%	€144.14	€162.00	€17.86	12.4%	€136.89	€154.00	€17.11	12.5%	€119.70	€135.00	€15.30	12.8%
100g	€181.25	€204.00	€22.75	12.6%	€161.35	€182.00	€20.65	12.8%	€144.14	€162.00	€17.86	12.4%	€130.56	€147.00	€16.44	12.6%

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Appendix 13: Additional Insurance Services and Other Services

Additional Insurance Services*

Compensation Limit	Current	Proposed	Increase	% Increase
€1,500	€4.00	€4.50	€0.50	12.5%
€2,000	€5.00	€5.50	€0.50	10.0%

Other Services

Other Services	Current Rate	Proposed Rate	Increase	% Increase
PO Box / Private Bag (rate per annum) -USO Service	€295.00	€325.00	€30.00	10.2%
Replacement Keys	€65.00	€70.00	€5.00	7.7%
Vanity PO Box (rate per annum)	€600.00	€700.00	€100.00	16.7%
PO Box delivery (rate per annum)	€1,000.00	€1,100.00	€100.00	10.0%
Distance fee per km (Collections & PO Box delivery)	€0.95	€1.00	€0.05	5.3%
Caller Service (rate per annum)	€295.00	€325.00	€30.00	10.2%
PO Box forward (rate per annum including delivery)	€2,000.00	€2,250.00	€250.00	12.5%
Minimum Customs Administration Fee	€7.00	€10.00	€3.00	42.9%
Delivery Box	€69.99	€69.99	€0.00	0.0%
AddressPal Standard	€3.50	€3.75	€0.25	7.1%

2 Response from ComReg dated 14 February 2017



14/02/2017

Mr Brian McCormick
Director Services
An Post
GPO
O'Connell Street
Dublin 1
D01 F5P2

Ref: Repeal of section 30 of the Communications Regulation (Postal Services) Act 2011 (“2011 Act”) - universal postal service price increases

Dear Brian

Thank you for your letter of 10 February 2017 which sets out the price increases which An Post will implement for its universal postal services and certain other postal services, once the *Communications Regulation (Postal Services) Amendment Bill 2016* (“Amendment Bill”) has been enacted and section 30 of the 2011 Act has been repealed. ComReg’s comments in this letter are based on the assumption that the Amendment Bill before the Oireachtas will be enacted as currently is. Our comments are also based on the assumption that the eventual price increases, as proposed in your letter, are made.

The repeal of section 30 of the 2011 Act would mean that ComReg would no longer have any statutory power to regulate the prices of universal postal services on an *ex ante* basis. This means that the prices of universal postal services would be set exclusively by An Post and increases in those prices would not require ComReg’s advance oversight or approval, nor would ComReg have any power to limit the size of such increases.

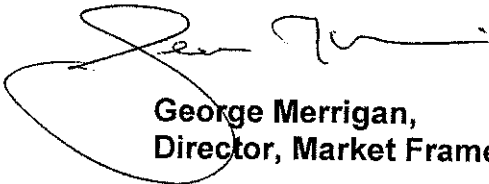
However, the prices of universal postal services will still be subject to the “tariff requirements” which specify that such prices must be affordable, cost-oriented, uniform throughout the State, transparent, and non-discriminatory.¹ In accordance with the 2011 Act, An Post must ensure that its prices for the universal postal services comply with the tariff requirements. ComReg will continue to monitor An Post’s compliance with the tariff requirements, but on an *ex post* basis (i.e. after the event).

¹ Section 28 of the 2011 Act, transposing Article 12 of the EC Postal Directive.

We also note that An Post proposes price increases of up to 39% and we must again express our concern that increases of such magnitude could appreciably hasten the ongoing decline in letter mail volumes and so further jeopardise the future of the universal postal service.²

Please also note that we will publish your letter and this response once An Post makes its price increases public, as the price increases will then no longer be confidential³. If you wish to make representations in this regard, please do so by 21 February 2017. Any claim for confidentiality will be assessed in accordance with ComReg's guidelines on the Treatment of Confidential Information (Document No. 05/24 available at www.comreg.ie).

Yours sincerely



**George Merrigan,
Director, Market Framework**

² Statement made to the Joint Committee on Communications, Climate Action and Environment on Policy issues arising from the Communications Regulation (Postal Services) (Amendment) Bill 2016. See <https://www.comreg.ie/publication/statement-joint-committee-communications-climate-action-environment/>

³ Please inform ComReg if any of the actual price increases made are different than the proposals made in your letter.