



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

# Postal Universal Service Provider Designation Step 1 Review and Decision

Submissions to Consultation Document No.  
19/125

## Submissions to Consultation

**Reference:** ComReg 20/26s

**Date:** 07/04/2020

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

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## Submissions Received from Respondents

Consultation:	19/125
Response to Consultation:	20/26

# 1: An Post

## An Post Response to Consultation and Draft Decision on Postal Universal Service Provider Designation (Ref. ComReg 19/125)

An Post welcomes the opportunity to respond to this consultation on the Draft Decision on Postal Universal Provider Designation (Ref. ComReg 19/125). Responses to the two specific questions posed by the consultation are set out below.

### An Post Response in summary:

1. An Post agrees that a USP designation is necessary in order to safeguard and ensure the provision of the full universal postal service obligation (USO) for the entire State; and
2. An Post submits that a USP designation should be made for a minimum period of five years, and preferably 7.

### Question 1

Do you agree or disagree with ComReg's assessment and preliminary conclusion as set out above and ComReg's draft decision as set out at Annex 1 of this document? Please document clearly what part(s) you are in agreement or disagreement with by providing a detailed response with supporting information / data where appropriate to support your view.

#### 1.1 Agreement with ComReg's Preliminary Conclusions in ComReg Document 19/25

- 1.1.1 An Post agrees with ComReg's preliminary conclusion (para. 29) and its draft Decision (Annex 1), that there is a continued need for a USP designation at this time in order to safeguard and ensure the provision of the full universal postal service obligation (USO) for the entire State, as required by the Communications Regulation (Postal Services) Act, 2011, as amended (the "2011 Act").
- 1.1.2 Based on ComReg's investigations and enquiries, there is currently only one operator in the State that is providing all of the required universal postal services in full, as required by legislation. There is just one other operator that is providing one service within the scope of the universal service but this is in a limited geographic area only. That operator is not providing the service on a nation-wide basis to all users. The market alone clearly cannot ensure full USO provision. As a result, a USP designation is crucial to ensure the provision of a sustainable and continuous USO.

An Post agrees with the Draft Decision Instrument for Step 1 contained at Annex 1 of ComReg 19/25, that:

- (i) there is a continued requirement for universal postal service provider designation at this time; and

- (ii) ComReg should proceed to Step 2 of the Procedures described in ComReg 19/64a.

1.1.3 There furthermore exists a risk that, in the absence of USP designation, providers operating in the market may choose to deliver with less frequency in remote or rural areas in an effort to reduce costs, or may price on a zonal basis to reflect the greater costs associated with delivering to remote areas. This may result in a move away from the universality of the postal service, under which both rural and urban service users may access the same quality service for the same price.

## 1.2 Lack of new entrants and regulatory requirements

1.2.1 An Post notes that ComReg's own reviews and enquiries indicate that there is an absence of other postal service providers offering services within the scope of the USO, and as a result, a more detailed assessment of the market's capability to provide each of the universal postal services, in accordance with the criteria therein specified, is not necessary at this time.

1.2.2 The market cannot guarantee the provision of all features and requirements of the postal USO and in the manner required. There is a legislative requirement for daily collection and delivery for a range of postal items (being in practice: letters, large envelopes, packets, and parcels across varying weight steps) whether of domestic or international origin, together with a range of complimentary services (such as redirections, poste restante etc.) in respect of every household<sup>1</sup>. These services must be provided on a basis which is:

- non-discriminatory and on uniform, harmonised terms for all and across the entire country;
- subject to specified, mandatory quality of service obligations; subject to review and monitoring by the Regulator;
- subject to pricing control by virtue of pricing rules (the "tariff requirements") by which potentially conflicting objectives of affordability, cost orientation and uniformity must be observed;
- subject to complex accounting requirements that extend well beyond the standard statutory accounts requirements set out in company law and in effect, apply in respect of both services falling within the scope of the USO and those outside of it; and
- subject to stringent and often protracted information gathering requests from the Regulator.

1.2.3 Considerable and complex infrastructure and resources are directly and unavoidably required to fulfil this USO mandate and to ensure that consumer

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<sup>1</sup>This obligation is derived from Section 16 of the 2011 Act in conjunction with SI 280/12, as amended.

needs are met and safeguarded on a continuous, nationwide and harmonised basis. In addition, the legislation requires adaptation to the evolving needs of the technical, economic and social environment.<sup>2</sup>

- 1.2.4 As a result, at the same time as respecting the tariff requirements, a USP must ensure a reasonable level of remuneration and viable activity to allow for long-term development and modernisation of the extensive infrastructures required to provide a USO. There are significant costs and obligations associated with designation as a USP, which extend far beyond the financial and operational burdens most economic operators bear. A USP designation is therefore critical to ensure that the USO obligation is actually met. Provision of the USO to the required statutory and regulatory standards is neither simple nor appealing to most commercial operators or potential newcomers; nor is it a service offering that the market can be relied on to provide without a USP designation.
- 1.2.5 In addition, a designated USP must contribute directly to the cost of regulation of the USO through payment of a levy based on revenues derived from services with the scope of the USO.
- 1.2.6 As such, the market for universal postal services is not attractive to newcomers and this compounds the need for a USP designation to ensure that all features of the USO are provided in accordance with legal and regulatory requirements and to ensure that all consumer needs are met and safeguarded in an evolving market.
- 1.2.7 Designation of more than one USP or of another USP in respect of a certain subset of the USO simply will not enhance the provision, or long-term sustainability, of the USO.
- 1.2.8 It is difficult to identify the grounds on which one product area or one geographic area can be fairly separated and apportioned to another designated entity without jeopardising the fundamental viability of the USO overall.
- 1.2.9 To split or separate the USO mandate would in addition place one operator at a competitive disadvantage vis-à-vis the other with a scaled down or different remit. It is evident that this option has not been followed in other EU member states. An Post notes that ComReg has (in ComReg 19/125 - para. 5) included "efficiency" in postal service operations as a regulatory requirement imposed on the designated USP. An Post submits that while this is not strictly a postal regulatory requirement, it is in the interests of the sustainability of the USO. The corollary is that a USP must be allowed pursue reasonable levels of commercially viable activity alongside less commercially attractive services to permit long-

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<sup>2</sup>Section 16(9) of the 2011 Act.

term development and modernisation of the extensive infrastructures required for a USO, while at the same time adapting to changing needs of consumers and users, as is required by legislation. The obligation to evolve, modernise, and adapt is required of the USP in law. As detailed further below, certain service offerings have become inherently less attractive commercially although still required at this time in order to meet all consumer needs.

- 1.2.10 The objective of ensuring provision of the universal nature of the USO on the required terms for all and subject to the same obligations must be ensured. Designation of one USP only, with the attendant obligations to meet consumer needs, maintain adequate infrastructure and deploy resources in a manner that is subject to regulatory review is necessary in order to ensure the USO is provided as required by the State and by legislation. The infrastructure required to provide the USO is considerable. As mentioned above, the commercial viability and financial solidity required to provide this infrastructure is enhanced by providing for a sole USP designation.
- 1.2.11 Splitting USP designation does not serve the objective of a high quality and uniform service for all and would lessen social and territorial cohesion as between urban / rural areas. Striving to ensure and maintain this cohesion is directly referred to in the EU Postal Directives and the essence of the USO is that the same services are available for all in all areas subject to the regulatory controls that USP designation entails.
- 1.2.12 The postal sector, although increasingly forced to compete with digital communications services (as outlined further below), requires deployment of its infrastructure and resources in an entirely different manner. Improvements in roads and related networks as well as automation developments means that these resources are evolving and improving with time. It would be entirely counterproductive at this time to take a narrow view of individual services and fragment the postal USO - this would effectively duplicate the transport, equipment and labour resources (and related costs) and likely increase the environmental harm. A sole USP designation across all service requirements and for a certain and sufficient period of time is the best means to achieve the statutory objective of a sustainable USO.
- 1.2.13 A designation as a USP means that at the same time, due regard must be given to the nature of the USP's business, its customers and users, its employees, the technological challenges arising, and importantly, the changes driven by environmental and climate change concerns. An Post notes that a designated USP has responsibilities in this regard and that USP designation facilitates fulfilment of these, at times apparently conflicting, regulatory objectives in the market for universal postal services. The USP designation is made in direct fulfilment of the State's obligations to ensure its international postal obligations

pursuant to the Universal Postal Convention. An Post therefore submits that the best means to ensure the USO and its sustainability, as well as the regulatory oversight in a manner that does not prejudice the operator or the service, is to make a sole USP designation.

### 1.3 Market Decline

- 1.3.1 A USP is obliged to monitor evolving traffic forecasts and adapt accordingly, while at the same time, ensuring that all customers' needs are met and in a sustainable manner. In 2018 An Post's universal service obligation (including domestic and international elements) loss was €9.3m.<sup>3</sup> An Post covers this loss through revenue from other income streams.
- 1.3.2 The worsening economic fundamentals of the provision of traditional mail renders it unlikely that a competitive market will again arise in this segment. On 13 April 2017, An Post raised its stamp price from €0.72 to €1.00 to achieve improved cost-orientation in its pricing, which had hitherto sat significantly below cost.
- 1.3.3 Despite this price increase, which it could be argued created greater scope for another postal service provider to gain market share by undercutting An Post's pricing, the postal market in Ireland has contracted further since 2017. No new entrant, domestic or international has joined the Irish letters market since the time of the price increase, while postal service provider CityPost exited the market in 2018.
- 1.3.4 This demonstrates the present and foreseeable position of the letters market in Ireland, which is that, even at these more recent, higher prices, little commercial appetite appears to exist for competitors to enter an industry in which scant opportunity to generate profit exists at competitive rates, and ongoing volume decline, or market contraction, appears a steep and irreversible trend.
- 1.3.5 The infrastructure required to provide the USO to the extent required is considerable, both in terms of capital and employees. As mentioned above, the commercial viability and financial solidity required to provide this infrastructure is enhanced by providing for a sole USP designation. The required investment in such infrastructure (both for its creation and the required continuing adaptation to changing user needs) cannot be easily justified without some reasonable level of certainty as to the return and longevity of such investment which USP designation enhances.

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<sup>3</sup> An Post, Summary Regulatory Financial Statements 2018, p. 2.



## 1.4 The Changing Needs of Postal Service Users

- 1.4.1 An Post notes that postal user needs are in transition. Many consumers continue to frequently use mail (approximately 21% of those aged 65+ state that they send a standard letter at least once a week) and that some correlation, though far from a strict one, exists between the frequency of sending mail and dissatisfaction with its cost.<sup>4</sup>
- 1.4.2 ComReg recognises that the changing nature of the reasonable needs of postal service users will require consideration by policy-makers and legislators in determining the extent to which the legal requirements of the universal postal service may be revised.<sup>5</sup> A postal user needs study recently conducted for the European Commission has indicated a future need for a universal postal service, albeit one that may require some reductions in service levels.<sup>6</sup>
- 1.4.3 While An Post is cognisant of the work being conducted by the European Commission to review the future composition of a universal postal service contained in a potential amendment of Directive 97/67/EC, the present requirements of Article 3 of the Directive, currently transposed in section 16 of the Communications Regulation (Postal Services) Act, 2011, and attendant secondary legislation, will remain in place for some time.
- 1.4.4 Accordingly, it is apparent that An Post must not only strive to meet its legislative requirements with regard to the universal postal service and the provision of a next-day delivery service, but also meet the needs of users who seek to minimise their costs and who do not place a priority on next-day delivery. USP designation may facilitate achievement of these sometimes conflicting and consumer driven objectives by ensuring all needs are met. USP designation also provides visibility of evolving traffic volumes and trends as well as impacts on the USO network. However, a USP is obliged to exploit its infrastructure (and the investment in that infrastructure) in a way that serves the availability and sustainability of the USO globally. Without a USP designation, this may not be a viable or attractive business choice and consumer choice and interest would suffer as a result.

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<sup>4</sup> ComReg, 19/84a, June 2019

<sup>5</sup> Ibid.

<sup>6</sup> Wik Consult, User Needs in the Postal Sector and Evaluation of the Postal Services Directive: A study for DG GROW, December 2019, p. 10

## 1.5 Commitment to the Universal Postal Service and evolving user needs

1.5.1 An Post notes, however, the statement made by ComReg at section 27 that:

*“Without a USP designation and without significant competition An Post could fail to provide a universal postal service or fail to provide it in accordance with the affordability, service quality and service access requirements, or for commercial reasons decide to discontinue a universal postal service or to limit a universal postal service to certain regions.”*

1.5.2 ComReg's basis for concern is understandable, given the rapidly changing nature of business and personal communications, and the continuing contraction of the market for traditional mail, which has seen an average fall in volume of 5.4% annually over the past five years.<sup>7</sup>

1.5.3 As stated above, there are additional obligations that necessarily follow from USP designation and that ensure that the communications needs of all citizens in all regions are fulfilled in the required manner. A standard economic operator without USP designation would escape these obligations and its service offering would not be constrained by obligations to offer certain services to all users on equivalent terms, no matter where such users reside or do business. Commitment to providing a full universal postal service, and to ensuring the communications needs of consumers as well as business (including smaller business in the SME sector) are met is required. This may not be an attractive commercial option without the relative level of certainty as well as the regulatory oversight that sole USP designation entails.

1.5.4 Designation of a USP ensures that a range of postal services fulfilling differing user needs (as outlined above) is provided on uniform terms across the entire geographic area. It is obvious in any communications or similar service provision that where one geographic area or region is left behind, the costs (both direct and indirect) of catch up at a later stage are considerable.

1.5.5 As An Post has previously stated, for a wealth of postal products effective digital or e-substitutions exist, which businesses and individual citizens may utilise to communicate.

1.5.6 It is therefore An Post's view that postal services compete, not necessarily with each other in isolation, but with digital and other alternatives. In this regard, An Post is cognisant that we must continue to offer value and quality of service in our products, which stand in competition with a range of digital solutions. The USP designation ensures that where digital innovations are developed by the

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<sup>7</sup> An Post Annual Reports, 2014, p. 24; 2015, p. 7; 2016, p. 4; 2017, p. 14; and 2018, p. 10.

designated USP, whether in terms of modernised payment solutions for stamp/labelling or the services themselves, the end solution is available to all users across the country on equivalent terms (including whether at the counter or on-line) and the underlying postal service available through these innovations is also available on similar terms.<sup>8</sup>

#### 1.5.7 Sustainability of the USO and Environmental concerns

Provision of the USO by the designated USP implicitly requires that postal services are provided in a manner that is also environmentally sustainable for all users. Provision of the USO is always required to be in the public interest. Striving to reduce the deleterious effects of the transport network that forms part of the USO infrastructure is entwined within the responsibilities flowing from USP designation. Arguably, this should bind all postal operators to ensure a level playing field. This is directly provided for in the EU Postal Directives.<sup>9</sup> However, actions to achieve these objectives are not always viable or attractive on a purely commercial basis. This is recognised in the legislation as being a “non-economic” matter. USP designation is both a means to coerce and to facilitate the USP achieving this crucially important objective across a full range of the required services and for all users across the country in a coherent and efficient way. Thus, USP designation can also foster environmental sustainability efforts for all consumers and users.<sup>10</sup>

#### 1.5.8 Integrity of the network and international obligations

The national postal network does not operate in a vacuum. Also required in the USO and the USP designation is the requirement to handle and deliver postal items sent to users in Ireland from overseas. The postal service would not be complete without this feature. And yet it is clearly in the interests of the USO network and service provision that a post person deliver mail to end users regardless of the origin of such mail. Fragmentation of the service offerings would not be in consumer interests. USP designation is required to ensure a coherent and uniform approach to the costs associated with such services and to ensure a national operator can leverage international relations and developments in that regard.

### 1.6 Maintenance of Affordable and Competitive Pricing in Challenging Times

1.6.1 As stated above, although not subject to prior price approval by ComReg, USP designation imposes considerable level of pricing constraint in relation to the USO by virtue of the tariff requirements<sup>11</sup>. These tariff requirements impose

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<sup>8</sup> An Post’s Click and Post offering is an example of affording such an equivalent treatment to users.

<sup>9</sup> EU Postal Directive 97/67/EC (as amended) Article 9 and the obligation to ensure that the “essential requirements” are protected, which includes general noneconomic reasons, such as environmental protection.

<sup>10</sup> The roll out of An Post’s zero emissions transport initiatives reflects the responsibilities and duties inherent in USO designation.

<sup>11</sup> Section 28 of the 2011 Act.

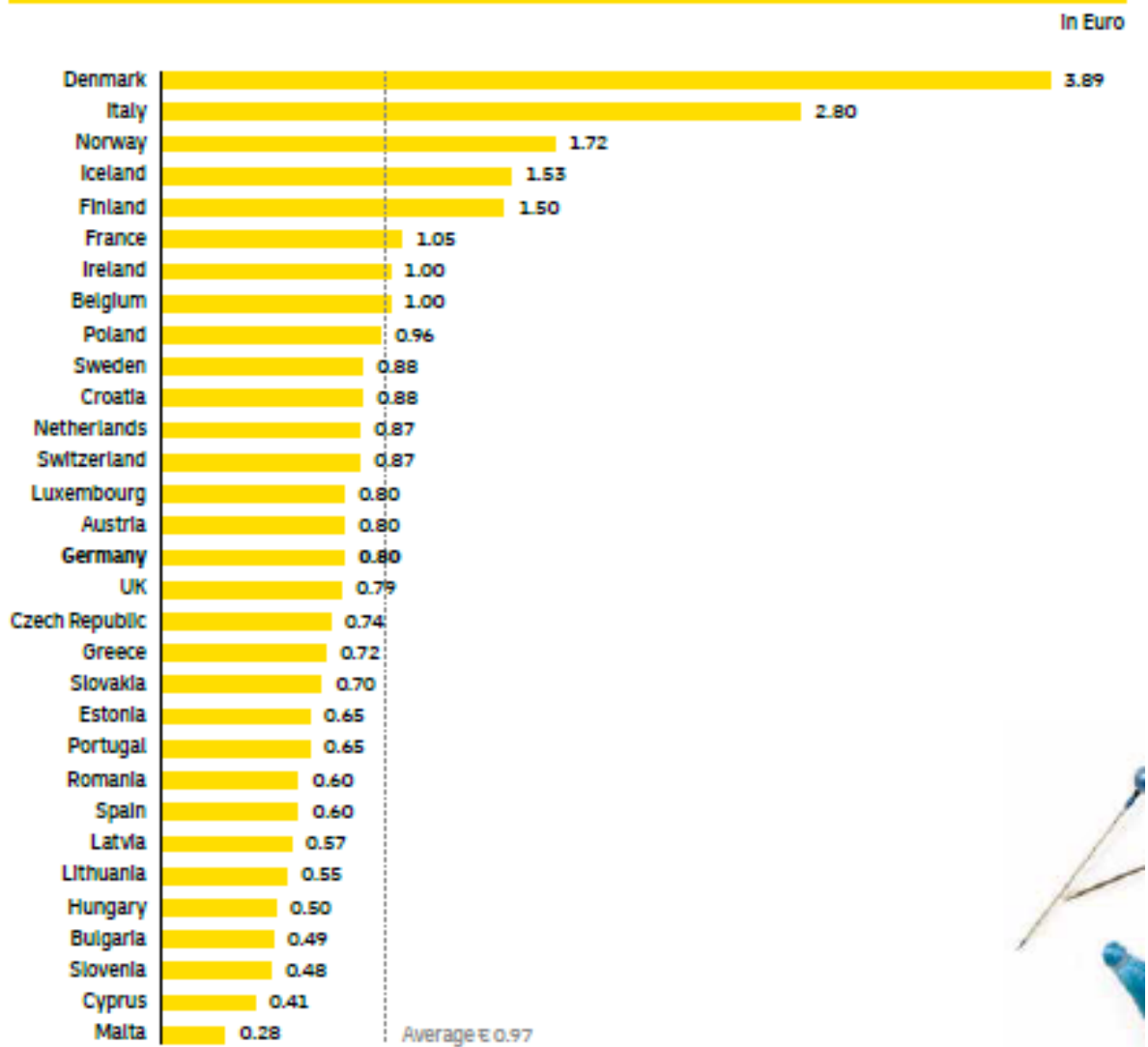
obligations on the designated USP when setting its pricing which would not necessarily apply to other operators without USP designation.

- 1.6.2 In order to ensure long term provision of a full range of USO products and related features, a designated USP must also consider the evolving user profile and user needs in addition to the types of services and the quality standards that are required as part of the USO and enshrined in primary and secondary legislation. The full range of matters do not usually need to be considered by a standard economic operator, which can swap and change product offerings (and their pricing) far more easily according to straightforward matters such as demand and cost.
- 1.6.3 A designated USP on the other hand must take into account justified business objectives such as stimulation of demand, and changing consumer patterns at the same time as ensuring that all users, whether the most modern or traditional, are also provided the required service (and to the required level of quality where applicable). Designation of a sole USP enhances this obligation since by the very nature of postal services and the infrastructure involved, a review on a single product by product basis may not yield the required outcome in terms of range of service provision and tariff requirements.
- 1.6.4 An Post operates a highly competitive pricing structure for its universal postal services in European terms. Even in nominal pricing, which does not reflect the differences in the relative cost structures of economies across the continent, the price of a domestic stamp sits close to the European average (€0.97), as is demonstrated by the below graph.<sup>12</sup>

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<sup>12</sup> Deutsche Post, Letter prices in Europe, June 2019, p. 7.

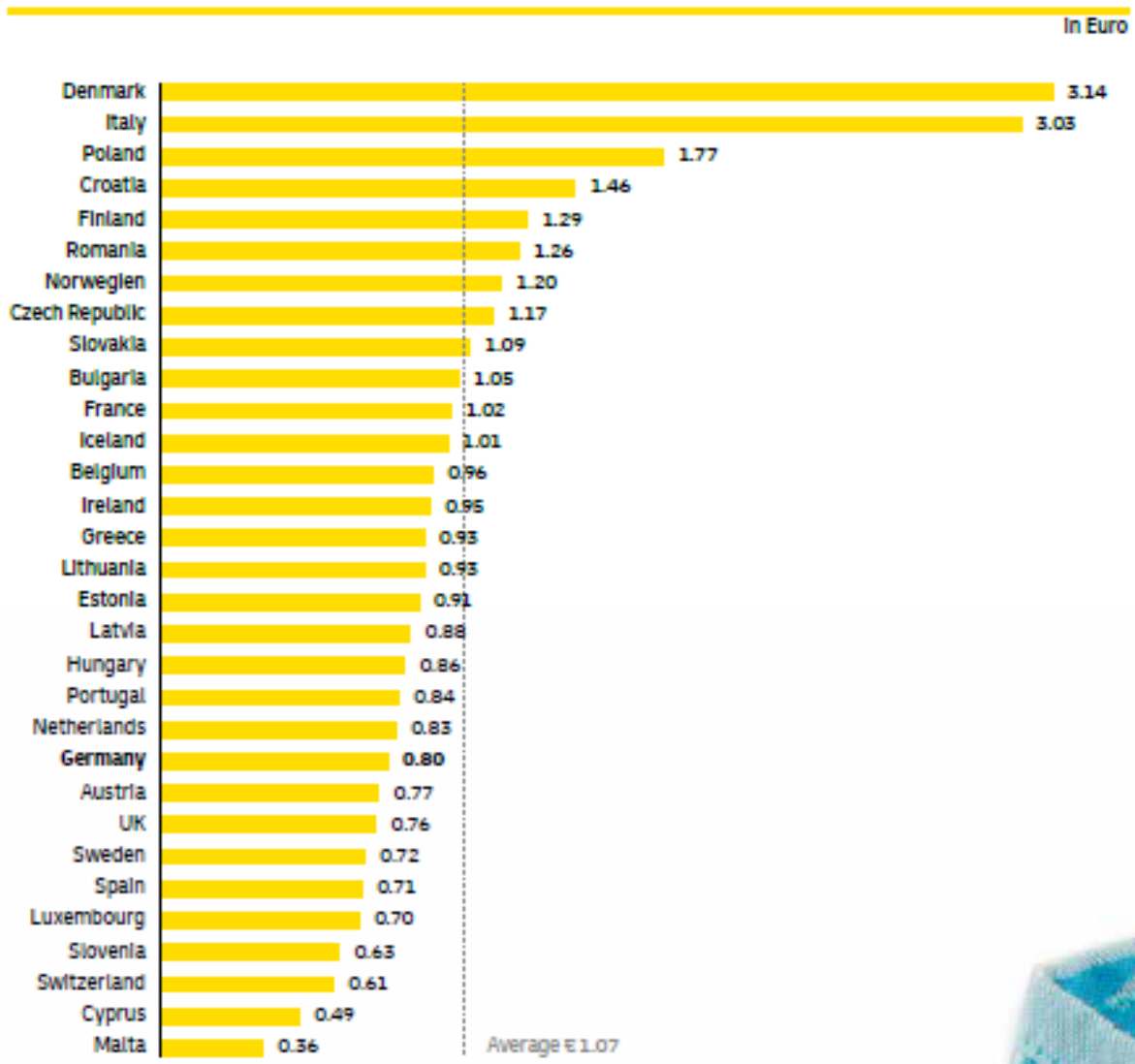
## Nominal price for a domestic standard letter



1.6.5 However, once purchasing power parity is applied to postage pricing, a method of measurement recognised as providing a fairer comparison of cross-jurisdictional pricing structures, the cost of a stamp in Ireland sits €0.12 below, or at just 89% of, the European average and lies towards the bottom of the second quartile of European domestic letter pricing, as can be seen from the below graph.<sup>13</sup>

<sup>13</sup> Ibid, p. 21.

## Letter prices adjusted for purchasing power differences



1.6.6 It is An Post's intention to continue to offer its consumers high-quality postal services at affordable and internationally competitive prices, as it meets the challenges associated with a rapidly changing postal market.

## Question 2

Do you agree or disagree with ComReg's proposal for the appropriate USP designation period as set out above? Please document clearly what part(s) you are in agreement or disagreement with by providing a detailed response with supporting information / data where appropriate to support your view.

### 2.1 Proposed USP Designation Period

- 2.1.1 An Post submits that should a designation be made pursuant to section 17(2)(a)(ii) of the 2011 Act, this period should be set at a minimum of five years.
- 2.1.2 ComReg should be cognisant that the designation time period is a matter of crucial importance to the commercial viability of the USO provider. As has been outlined above, a designated provider is required to have the infrastructure in place to fulfil the current postal USO and meet all user needs, including whether not economic to do so; while also adapting and adjusting to changing user needs. This is all the more fundamental where an entity enters into third party financial commitments.
- 2.1.3 The various positions asserted by ComReg in relation to the possible designation time periods are not entirely clear. ComReg's Designation Procedures (ComReg Document 19/64a) did not include this matter as an item to be considered in Step 1. In addition, it has not been included in the draft decision in Annex 1. However, it is assumed that the matter has been included on the basis that ComReg's draft Decision is that a USP designation is required, and that accordingly, a time period for such designation is also required to be determined if the ultimate determination is not that An Post's designation is continued until 2023 in accordance with Section 17(2)(a)(i) of the 2011 Act.
- 2.1.4 An Post submits that the manner in which possible decisions under Section 17 of the Act has been presented in this Consultation is not entirely clear. An Post emphasises that under Section 17(2)(a)(ii), it is permitted to appoint one USP only for a period of time, whether that is for 5 years or otherwise and assumes that this is also ComReg's interpretation. An Post relies on the position set out by ComReg previously in ComReg 19/25 dated 22.03.2019 (page 9 and page 21 (paras. 1.33 - 1.34)) in this regard. An Post submits that a period of at least 5 years is required. This is the minimum time period used in any standard commercial investment and return calculations, which in fact, are far more likely to run to 10 years, since two 5-year phases are usually contemplated for businesses of this size and scope.
- 2.1.5 Furthermore, the next five years will be a period of considerable change for the postal service. It will be necessary for An Post, or indeed any designated provider, to make considerable investments during this time, and therefore designation for

a reasonable period will be required to secure a return on investment. Some investment may be funded through borrowing, and access to credit may be predicated on certainty of designation and a designation period of reasonable duration.

- 2.1.6 As is referred to further below, An Post submits that the most viable option on a global basis for USO provision is to designate one USP only.
- 2.1.7 A designated USP must take into account the longer term business and consumer patterns while at the same time, ensuring that all users, whether the most modern or traditional, are provided the required service (and to the required level of quality where applicable). Designation of a sole USP enhances this obligation - given the nature of universal postal service provision and the infrastructure involved, a review on a single product by product basis may not yield the required outcome in terms of range of service provision and tariff requirements for all users.
- 2.1.8 ComReg should also be cognisant that the designation time period is a matter of crucial importance to the commercial viability of an entity required to have the infrastructure in place to fulfil the postal USO.



## 2: TiCo Mail Works Ltd (“TiCo”)



Tico Mail Works

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Reference: Submission re ComReg 19/125

By email: [retailconsult@comreg.ie](mailto:retailconsult@comreg.ie)

14 January 2020

Tico Mail Works, in response to the ComReg consultation on step 1 of the review of the USP, generally agrees that there should continue to be a USP. However, Tico Mail Works believes that enhanced emphasis should be placed on enforcing certain statutory tariff obligations, with which the USP must comply.

Section 28 (1) (d) of the Communications Regulation (Postal Services) Act 2011 requires that tariffs be transparent and non-discriminatory. Tico Mail Works has repeatedly raised the question of the real risk that unjustifiably low terminal dues rates (which are, of course, tariffs) will lead to breaches of this statutory non-discriminatory tariff obligation.

While acknowledging the efforts made to improve the position on terminal dues, the reality is that this unsatisfactory situation continues to be a potential existential threat to the indigenous Irish bulk mail industry. While perhaps not the place to go into detailed consideration of solutions, one is left wondering if another increase in the headline tariff rate (with a knock on effect of increasing terminal dues rates), and no further increases in bulk mail rates, is the only feasible and effective route to remedy the problem.

As regards ComReg's suggestion that the designation should be for a period of five years, Tico Mail Works has no objection to this proposal.

  
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CEO and Managing Director

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**Tico Mail Works**

*Who are Tico Mail Works?*

*Tico Mail Works is an ISO 9001 and ISO 27001 certified bulk mail producer and ComReg authorised postal service provider, producing and posting over 250,000 pieces of personalised mail every week for government, semi state, financial, utility and retail customers.*

*We describe ourselves as world class, customer focused, problem solvers, delivering a quality service at a fair price, honestly and transparently.*

*We aim to produce and post every piece of mail on time and without error. Our motto is 'We give our customers peace of mind'.*

*Sustainability and Corporate Social Responsibility are particularly important to our business which is based on four pillars (1) Customers and Suppliers, (2) Staff, (3) The Environment, (4) The Community and underpinned by the 17 United Nations Sustainable Development Goals.*

*For further information please see our Sustainability Report available on our website [www.ticomailworks.ie](http://www.ticomailworks.ie)*

**Tico Mail Works Ltd.**

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