



Huggler Group

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Competition Regulatory Authority
2nd Floor
Salisbury House
Union Street
St Helier
Jersey
JE2 3RF

27th April 2010

Dear Mr Hamilton

Ref: Citipost DSA Limited for a Class I Postal Operators Licence

We, Huggler & Co Ltd strongly support competition being allowed into the postal market in this area and fully support the application by Citipost for the following reasons:

- 1) We have invested in 3 local companies that ship out of Jersey and all have been severely affected by very large and inflation busting increases in postal rates. They will each have to reconsider their futures in Jersey if no competition is allowed into the postal market. This would result in the loss of significant numbers of jobs locally, both unskilled and skilled at present these companies employ in excess of 100 people in Jersey.
- 2) If these firms have to leave Jersey or move their operations out of Jersey, Jersey Post will lose out on all the other post these companies send as well as any that may be lost to competition.
- 3) We are at present investing in the region of £1 million in a new online printing venture which is to be based in Jersey and ship out of Jersey. The recent postal price rises that our present printing operation, Huggler Print, has seen this year have caused us to consider if we are investing in the right location. We have just received our Regulation of Undertakings to employ 5 more local persons to launch the new venture and if no competition is allowed in the postal sector we will have to review our mid to long term plan for this venture regarding its base being in Jersey.
- 4) If no competition is allowed the fact all local e-commerce companies, not just the ones we are involved with, rely on Jersey Post and Royal Mail entirely for delivery of our goods and as was seen during the Royal Mail strike all Jersey ecommerce companies were unable to deliver their goods, unlike our competitors in the UK who had access to other firms to keep deliveries and hence trade going. If competition is allowed this would provide 2 or 3 companies inc Jersey Post that are licensed and VAT import registered and ensure we would have different routes to our customers in the UK and overseas.

Yours sincerely


Lawrence Huggler
Managing Director

Huggler & Company Limited

Huggler Hotels
Hotels in England & Jersey

Huggler Print
Printers & Publishers

Huggler Properties
Property Management