**Sent:** 20 July 2012 10:19

Subject: Consultation on Measures of the Quality of Postal Services in the Channel Islands

Dear Sir

Thank you for the opportunity to take part in CICRA's 'Consultation on Measures of the Quality of Postal Services in the Channel Islands'.

#### Introduction

Broadly, we are satisfied with the proposed arrangements because they essentially reinforce those that are currently in place. We appreciate the importance of providing this information to our customers and are already collecting the majority of the data required.

However, there are some important points we would like to make.

#### **Performance Measures**

The performance measures must offer a directly comparable set of results to users. The measures must therefore take account of the different geographical circumstances facing Guernsey and Jersey, in that Guernsey Post must provide the same quality of service in delivering to the entire Bailiwick, namely Guernsey, Alderney, Sark and Herm.

We would propose that the performance measures exclude those samples that have been affected by force majeure, such as weather and technical problems affecting the mode of transport.

## Scope

We note that the performance measures cover unregulated services outside Guernsey Post's Universal Service Obligation, such as Royal Mail Special Delivery and Express. We do not believe it is the role of the regulatory authority to monitor the performance of services that fall outside of its remit and would suggest that they are excluded.

Furthermore, there are currently technical problems with the collection of data on recorded and signed for items that we are currently resolving with Royal Mail. We would therefore ask that these are temporarily excluded until we find a solution with Royal Mail, or we identify an alternative, and until we consider the cost implications as outlined below.

# Cost

The supplier we retain to monitor our performance measures does not report on recorded, signed for and Express items. We estimate the cost of measuring these independently would amount to tens of thousand pounds, which Guernsey Post can ill afford given the recent loss of LVCR and ongoing volume decline.

# **Future Changes**

We would like to understand the process that CICRA will go through when reviewing the targets in the future. Any increase in the targets will clearly have cost implications and we would like to know that we will be consulted.

Yours faithfully

### **Richard Hemans**

**Finance Director** 

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