

Jersey Competition Regulatory Authority
2nd Floor Salisbury House
1-9 Union Street
St Helier
Jersey
JE2 3RF

Email Only

Dear Sirs,

I am writing to express my concerns regarding the recent Strategic Review of Postal Services conducted by the JCRA. While I appreciate the effort to review and update the regulatory framework, I believe the timing and circumstances surrounding this review render its findings largely irrelevant and, consequently, a waste of time and resources.

Timing of the Review

As stated in the draft decision, the review follows a five-stage process initiated in October 2022, with a call for information and an initial consumer survey that closed in January 2023. It is evident from the timing that the JCRA either was not informed by Jersey Post or chose to ignore the proposed withdrawal of the mail plane, a significant change that occurred midway through this review process.

Public Satisfaction Levels

The review records relatively high levels of satisfaction with Jersey Post's services, both inbound and outbound. However, these findings are now outdated and invalid due to the cancellation of the mail plane, as evidenced by the significant amount of negative commentary in the local press ([Channel 103](<https://www.channel103.com/news/jersey/amazon-investigates-jersey-delivery-issues/>), [Jersey Evening Post](<https://jerseyeveningpost.com/news/2023/05/19/business-owners-voice-concerns-over-possible-loss-of-jerseys-mail-plane/>)).

Market Dominance

Jersey Post holds a significant monopoly in both the letter and parcels market, with market shares of over 99% and 90% outbound, 69% inbound, respectively. While a dominant position is not illegal, the abuse of such is, and this is a matter I intend to address separately.

JCRA's Remit

The JCRA's primary role is not to protect Jersey Post but to safeguard the Universal Service Obligation (USO) and services for Jersey's businesses and citizens. The review's focus on "The future regulation of postal services" (Theme 3) appears to be too late in its intent, especially when the most significant change to these services occurred midway through the review.

Conclusion

If the JCRA was aware of the mail plane's withdrawal at any point during this review, it should have halted the process to save money and protect the public interest. If it was not aware, this raises questions about Jersey Post's reporting requirements to the JCRA and potential breaches of their licensing conditions.

While I understand that a review is part of the regulatory process, it is crucial that the JCRA does not rely on outdated and now irrelevant findings. I urge the JCRA to act on the actual problems facing Jersey's postal users today.

Yours faithfully,
Christopher Bee