

FUTURE DEVELOPMENT OF THE POSTAL USO TEAM Ofcom Riverside House 2A Southwark Bridge Road London

2 April 2024

SE19HA

By email to futurepostaluso@ofcom.org.uk

Dear Ofcom team.

CALL FOR INPUT: THE FUTURE OF THE UNIVERSAL POSTAL SERVICE

Immediate is home to many of the UK's leading magazine titles, including Radio Times, Good Food, BBC Gardeners' World magazine and BBC History magazine. Royal Mail carries around 14 million individual magazines to our customers each year.

We wish to emphasise and endorse the response to your Call for Input provided by the PPA (Professional Publishers' Association), the trade body which represents specialist media businesses. We, along with our industry peers, have given your Call for Input careful consideration and contributed to the thorough response provided by the PPA.

Reliability

Immediate has experienced ongoing and unresolved problems in recent years with the reliability of postal deliveries. Our customers have every right to expect that the product they pay for will be delivered to them promptly once dispatched, but the number of complaints that we receive about late-delivered copies has grown significantly. Repeated dialogue with Royal Mail has not resolved this problem.

This is a particular problem for Radio Times magazine, which is a time-sensitive publication. Ofcom will be aware that TV and radio broadcasters confirm their scheduled listings only a few days prior to transmission and so this weekly TV and radio listings title is created, edited, printed and dispatched to retail outlets or subscribers with very tight turnaround times.

Immediate receives a substantial number of complaints every week that copies have been delayed within Royal Mail's systems and often arrive with customers many days after they should, at which point some of the broadcast listings have passed. This greatly compromises our ability to serve our subscriptions customers well, and also disadvantages the broadcasters

that Ofcom regulates. The Call for Input did not provide us with certainty about how the potential changes to the postal USO would be effective in improving reliability of delivery times. We attach (with permission) an email received from a longstanding Radio Times reader which articulates how frustrating this can be for readers, and we know it is commercially damaging.

Digital substitutability

The Call for Input also mooted digital services as a substitute for many postal products, and we disagree. Many of our subscription readers are vulnerable by reason of advanced age, poor health or rural location, and we are concerned that your Call for Input does not fully recognise that for this audience, digital products are rarely an adequate, appropriate or welcome substitute.

Immediate is a multiplatform media business with considerable digital reach, but we reject the working assumption that postal services can be run down and digital services will meet the demand. Instead, we are concerned that if Ofcom has assumed that the volume of the postal market will inevitably decline, there could be further detrimental impacts to reliability and timesensitive deliveries as the market contracts at an artificially accelerated rate.

Ofcom's next steps

We recognise that this is a complex and challenging time for postal services. We hope that Ofcom will engage more deeply with Royal Mail's key customers to better understand their current concerns and then ensure that these matters will be corrected or mitigated in the course of any changes.

Immediate is well-placed to provide its expertise as the leading provider of magazine subscriptions in the UK, and would be happy to assist your further work.

Yours faithfully,

Sean Cornwell

Jess Burney

CEO

MD, Customer Marketing and Subscriptions