

## Your response

Please tell us how you came across about this consultation.

- Email from Ofcom
- Saw it on social media
- Found it on Ofcom's website
- Found it on another website
- Heard about it on TV or radio
- Read about it in a newspaper or magazine
- Heard about it at an event
- Somebody told me or shared it with me
- Other (please specify)

Question	Your response
<p><b>Question 2.1:</b> Do you agree with the provisional conclusions set out in our Equality Impact Assessment? Please state your reasons and provide evidence to support your view.</p>	<p>The Advisory Committee for Scotland (ACS) advises Ofcom about the interests and opinions, in relation to communications matters, of persons living in Scotland. The response from the ACS to this consultation draws on the knowledge and expertise of ACS members and is informed by our individual experience and through discussion at our meetings. It does not represent the views of Ofcom or its staff.</p> <p>The ACS welcomes Ofcom's focus on ensuring that regulatory changes do not disproportionately affect specific groups. However, we would encourage further consideration of the particular challenges faced by Scottish consumers, especially those in rural and remote areas.</p> <p>These communities often experience higher living costs, reduced access to services, and unique structural challenges that make them more reliant on postal services. Recent Royal Mail performance issues have compounded these difficulties, and it is important that the Equality Impact Assessment (EQIA) reflects the full impact of any proposed changes on these groups.</p>

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	<p>Additionally, Consumer Scotland has raised concerns about the affordability and quality of postal services, noting that rising costs and service changes are already affecting Scottish consumers. While the EQIA acknowledges affordability concerns, it does not fully address the significant price increases in recent years. For instance, the price of a First Class stamp has almost doubled over the past five years, rising from 70p in 2019 to £1.35 in April 2024. We believe it would be helpful to further explore how these cost increases affect different groups, particularly those on lower incomes or in digitally excluded communities who may rely more heavily on postal services.</p>
<p><b>Question 2.2</b> Do you agree with our assessment under the Welsh Language Standards? Please state your reasons and provide evidence to support your view.</p>	<p>n/a</p>
<p><b>Question 3.1:</b> Do you agree that we have identified the reasonable needs of post users? Please provide reasons and evidence for your views.</p>	<p>The ACS recognises Ofcom’s efforts to assess the needs of postal users. However, we believe that certain aspects critical to Scottish consumers, particularly those in rural and remote areas, require greater emphasis.</p> <p>Scotland’s geography, with its vast rural areas and dispersed populations, presents distinct challenges for postal service delivery. Many of these communities have limited alternatives, as access to courier services and reliable digital infrastructure remains a challenge. This makes postal services essential, and we encourage Ofcom to ensure that these realities are fully accounted for in its assessment.</p> <p>We also recognise the ongoing shift towards digital communication, but it is important to highlight that digital exclusion remains a significant issue in Scotland. A portion of the</p>

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	<p>population—particularly older people and those in low-income households—may not have reliable internet access or the digital skills to engage with online services. As a result, they continue to rely heavily on traditional mail services.</p> <p>Additionally, rural businesses and the local economy depend on reliable postal services for sending and receiving goods. Any reduction in service levels could have unintended economic consequences.</p>
<p><b>Question 3.2:</b> Do you agree that the market is meeting the reasonable needs of post users? Please provide reasons and evidence for your views.</p>	<p>The ACS remains concerned that the postal market is not fully meeting the reasonable needs of post users, particularly in rural and remote parts of Scotland.</p> <p>Royal Mail’s delivery performance has been a consistent concern, with missed targets disproportionately affecting rural communities. Ofcom’s own research highlights significant regional variations in service performance, with rural areas often experiencing longer delays. Given Scotland’s geography and reliance on postal services, we believe that additional measures may be needed to ensure a consistent and reliable service for all consumers.</p>
<p><b>Question 5.1:</b> Do you agree with our proposals and impact assessment on changes to the delivery frequency of Second Class letters so that those items would be delivered every other day from Monday to Friday, and would not have to be collected, processed or delivered on Saturdays? Please provide reasons and evidence in support of your views</p>	<p>The ACS acknowledges the financial pressures on Royal Mail and the broader trends in declining letter volumes. However, we have concerns about the potential impact of reducing Second Class delivery frequency, particularly for consumers in rural and remote areas.</p> <p>In many parts of Scotland, particularly the Highlands and Islands, postal transit times are already longer due to geographical constraints. A further reduction in delivery frequency could exacerbate delays, making it more difficult for individuals and businesses to</p>

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	<p>receive important correspondence in a timely manner.</p> <p>We also note that the selection of pilot units by Royal Mail has not adequately reflected rural areas. This raises questions about how representative the findings will be for Scotland's more remote communities.</p> <p>Additionally, the proposal to cease Saturday collections for Second Class mail requires further clarity. While many businesses may not currently receive Saturday collections, post boxes will still contain a mix of First and Second Class items. There may also be practical concerns for Post Offices, where accumulated mail over two days could present logistical challenges, particularly in locations that are not designed to store large volumes of mail for extended periods.</p> <p>Given these considerations, we encourage further assessment of the potential impact on Scottish consumers before any final decisions are made.</p>
<p><b>Question 6.1:</b> Do you agree with our proposal to set the First Class national D+1 performance target to 90%? Please provide reasons and evidence for your view.</p>	<p>The ACS remains concerned about the proposal to reduce the First Class D+1 performance target to 90%, as this represents a lowering of expectations rather than an effort to improve service. While we understand that Royal Mail has faced operational challenges, reducing the target does not address the underlying performance issues.</p> <p>Recent changes to Royal Mail's network, including a reduction in mail being transported by air, have led to longer delivery times—particularly in the North of Scotland. We believe it is important that targets reflect the needs of consumers rather than being adjusted downwards to accommodate performance challenges.</p>

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	<p>We also note that the Universal Service Obligation (USO) for parcels remains Monday to Friday, while Royal Mail delivers parcels Monday to Saturday. If Royal Mail intends to continue this additional service, it should be formally incorporated into the USO and measured accordingly. Without clear measurement, there is a risk of an incomplete or misleading picture of overall service levels.</p> <p>Furthermore, we believe it is important to ensure that performance metrics are applied consistently. Reducing the First Class target and removing Saturday as a delivery day for Second Class, while still delivering First Class letters and parcels on Saturdays without formal measurement, creates an imbalance. A clear and consistent approach would provide greater transparency and accountability for consumers.</p>
<p><b>Question 6.2:</b> Do you agree with our proposal to set the First Class PCA D+1 performance target to be 3% lower than the national target (i.e. for the PCA target to be 87% to align with our proposed 90% national target)? Please provide reasons and evidence for your view</p>	<p>Similar to our response to Q6.1, the ACS acknowledges the rationale behind setting a slightly lower target for PCAs. However, we note that under the previous targets, the PCA threshold was set at 91.5% against a national USO target of 93%—a difference of 1.5 percentage points. Under the new proposal, the PCA target would be set at 87% while the USO target reduces to 90%, effectively doubling the gap to 3 percentage points.</p> <p>This means that while the USO target reduces by 3%, the PCA target reduces by 4.5%, creating a larger disparity between the two. We would encourage Ofcom to maintain the same proportional headroom as before to ensure that performance expectations for PCA areas remain aligned with overall service standards.</p> <p>The ACS would also welcome the introduction of realistic differential targets for PCA areas</p>

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	<p>that better hold Royal Mail to account for delivery performance in rural and remote locations. At present, difficulties in serving rural and island communities are often cited as a reason for missing national targets. If it is acknowledged that these areas require a different approach, then specific, evidence-based targets should be set for them—and Royal Mail should be expected to meet them. This would provide greater transparency and accountability while ensuring that consumers and businesses in these locations receive a fair level of service.</p> <p>Additionally, during our engagement with Royal Mail, we did not receive sufficient detail on how these changes will be designed or implemented. The selection of pilot units did not fully reflect rural areas, which raises concerns about whether the proposed targets are based on representative data. We encourage Ofcom to consider these factors when finalising the performance targets.</p>
<p><b>Question 6.3:</b> Do you agree with our proposal to introduce a new First Class ‘tail of mail’ target of 99.5% at D+3? Please provide reasons and evidence for your view</p>	<p>The ACS is concerned that introducing a ‘tail of mail’ target could inadvertently shift the focus away from next-day delivery expectations. While ensuring that nearly all First Class mail arrives within three days is a positive aim, we would like to understand what safeguards will be in place to prevent this from becoming the default standard rather than a last-resort measure.</p>
<p><b>Question 6.4:</b> Do you agree with our proposal to set the Second Class D+3 performance target to 95%? Please provide reasons and evidence for your view.</p>	<p>Please see our response to Q6.1 which applies here as well.</p>
<p><b>Question 6.5:</b> Do you agree with our proposal to introduce a new Second Class ‘tail of mail’ target of 99.5% at D+5?</p>	<p>Please see our response in Q.6.3 which applies here as well.</p>

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Please provide reasons and evidence for your view.	
<p><b>Question 7.1:</b> Do you agree with our proposal to regulate D+3 access services, subject to a margin squeeze control and the other protections outlined above? Please provide reasons and evidence for your views.</p>	Where there are service delivery delays the points made throughout this apply.
<p><b>Question 7.2:</b> Do you agree with our proposal to change the specification of D+5 access services to remove Saturday as a delivery day? Please provide reasons and evidence for your views.</p>	Where there are service delivery delays the points made throughout this apply.
<p><b>Question 7.3:</b> Do you agree with our proposals to maintain a margin squeeze control on D+2 access services, where the relevant retail services are Royal Mail's First Class retail bulk services? Please provide reasons and evidence for your views.</p>	Where there are service delivery delays the points made throughout this apply.
<p><b>Question 7.4:</b> Do you agree with our proposals for pricing transparency and amending how access services are defined? Please provide reasons and evidence for your views.</p>	We support the proposals for pricing transparency and amending how access services are defined as it will allow consumers and businesses in Scotland to make more informed decisions.

Please complete this form in full and return to [futurepostaluso@ofcom.org.uk](mailto:futurepostaluso@ofcom.org.uk).