

Thank you for the opportunity to comment on OFCOM's proposed reforms to support a modernised universal service. We note that OFCOM believes that these proposed changes are necessary to support the continued provision of a universal postal service, which in turn will benefit consumers, businesses and the wider economy.

We would like to make you aware of a specific strand of our work for which there will be implications if the proposals to move to a system of delivering second hand post every other weekday and to remove the service on Saturdays are introduced.

The Wales National Travel Survey (WNTS) was launched in March this year. Transport for Wales has engaged the National Centre for Social Research to deliver the survey over the next three years.

The survey collects data on travel attitudes and behaviour from people living in Wales each year. Around 15,000 households will be randomly selected to be invited to take part annually. The survey is designed to be representative of all adults aged 16 or over living in private households in Wales.

The data collected will allow progress towards targets set out in Llwybr Newydd, the Welsh Government's Transport Strategy, to be tracked. It will inform decision making and improve the transport evidence base in Wales, enabling us to have a better understanding of transport users' needs in Wales.

The WNTS consists of 2 key elements: a core standard survey which contains demographics questions and identifies whether people have used various forms of transport and their opinions on these across various elements and a 48 hour travel diary covering the 2 days prior to taking the survey.

We are operating the WNTS over a full calendar year so that we can ensure that the data incorporates changes in travel patterns across the seasons and holiday periods. We also want to ensure that the travel diary covers a relatively even spread of days of the week. Postal deliveries are a key element of the implementation of the survey.

Should a decision be taken to cease second-class deliveries on a Saturday we will potentially see significantly lower volumes of travel diary days recorded for Thursdays, Fridays and Saturdays. Similarly, if post is delivered on alternative days during the week this could further impact the travel diary coverage. However, we appreciate that this impact might be mitigated if Royal Mail was to implement a 2.5 day a week delivery model for Second Class letters, as stated in the consultation paper, with half of addresses receiving Second Class letters on Monday, Wednesday and Friday one week, and then switching to Tuesday and Thursday the next week.

A switch to using 1st class post to ensure that letters are delivered on an even spread of days over a week, as previously, would mean a significant increase in postage costs, whilst alternatively a reduction in the numbers of letters being sent to potential respondents could impact the range of data derived from the survey.

We appreciate that there is an acknowledgement of this issue in general terms in the Equality Impact Assessment:

“ For public sector organisations sending time-sensitive letters, this could mean increased pressure on financial budgets therefore opting for a slower delivery speed due to lower costs. This could mean individuals receive time-sensitive letters later than currently expected.”

We also note OFCOM's commitment that any cost savings from the proposals "should support the financial sustainability of the universal service and, in the longer term, lead to lower and/or fewer price rises for users in respect of both priority and standard letters."

We also understand that the WTNS's specific requirement for time-sensitive postal deliveries may not be widely applicable. However, we thought that we should draw your attention to this example through the consultation process.

Yours sincerely

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