



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Consequences of the repeal of the price cap on certain of the universal postal services

Submissions to Consultation Document No. 19/43

Submissions to Consultation

Reference: ComReg 19/62s

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An Coimisiún um Rialáil Cumarsáide
Commission for Communications Regulation

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Submissions Received from Respondents

Consultation:	19/43
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1: An Post



Consequences of the repeal of the price cap on certain of the universal postal services

An Post response to ComReg Consultation 19/43

12 June 2019

Non-confidential version

1. An Post's Statement

The removal of the PCM was an extraordinary and essential measure that enabled An Post to achieve financial improvements that have brought the business out of its loss-making position of €12.4m in 2016.

The PCM involved price control by reference to estimated costs, volumes, and other considerations over a period of several years, using a prolonged regulatory process. Inevitably these estimates could never accurately reflect the eventual outcome in a very rapidly changing environment. The price cap severely restricted the ability of An Post to adjust prices quickly to address changes in costs and market conditions, resulting in significant financial losses.

Such financial losses are simply unsustainable and were in-part driven by a divorcing of pricing from the cost of providing postal services. This was especially the case for stamped letter traffic, which clearly showed significant losses with unit costs of €0.86 in 2015 compared to unit revenue of €0.70 in 2015, as reported in the 2015 An Post Regulatory Financial Statements.

Following the repeal of the PCM, USO prices were increased to better reflect the cost of providing these services, in line with the tariff requirements included in Section 28 of the 2011 Postal Services Act, with the price of the 100g standard domestic letter rising from €0.72 to €1, a price still below the European average.

In parallel, An Post has continued its drive for greater efficiency and cost-reduction in the provision of the USO. USO costs reduced by €1.3m (0.3%) in 2017. Change programme implementation continues to proceed and there are plans for further cost efficiencies. The reduction in labour FTE in the business since the commencement of decline in mail volumes in 2008 has reached over 2,000. Efficiency improvements year on year have been achieved and the number of delivery points has increased.

The effect of these measures was to contribute to An Post's profit of €8.4m in 2017, and a reduction in USO losses to €25.6m, including domestic USO losses of €3.3m, in that year. An Post posted a profit of €41.2m in 2018. The USO remains a significant, loss-making part of An Post's business, and will continue to require subsidisation from other revenue streams of the company's operations to ensure its maintenance.

With mail volume in steep and ongoing decline, it is now more important than ever that the rates charged for postage are cost-reflective and facilitate the continuing and sustainable operation of the USO for as long it may be required.

A continued ability to set appropriate prices remains central to An Post's ability to generate sufficient revenue to provide high quality services for postal service users, be they individual citizens or business customers. At a time of increasing ubiquity in digital communications media, and growing competition in parcels delivery, An Post's mails products must remain accessible, reliable, and timely.

The rapid on-going decline in mail volumes and the requirement for An Post to transform into a nationwide e-commerce delivery service will require further creative and substantial changes to pricing.

The scale and volatility of the market dynamics (parcel growth 30%+ p.a.) does not facilitate reliable forecasting: An Post has to have the freedom to act in an agile and timely manner to ensure customers can continue to have a world-class mail service and, with increasing necessity, a world-class parcels service.

An Post looks forward to continuing to serve as an important link between people, communities, and businesses through Ireland over the years to come.

2. Specific Responses

ComReg has highlighted a number of issues in Paragraph 19 of the consultation document, on which interested parties such as consumers and SMEs may submit comments. An Post would also like to give its perspective, as the universal service provider, on these points, which will elucidate its perspective on the PCM.

19.1 An Post view on whether the repeal of the price cap has ensured the continued provision of the universal postal service and the USPs ability to cover its efficient costs.

An Post is uniquely placed to answer this question. The abolition of the PCM has not undermined the delivery of the USO, as evidenced by the retention of a service ensuring next day delivery of mail on a five day a week basis. This is not the case for a number of European states, which have curtailed the delivery of a universal five-day service.

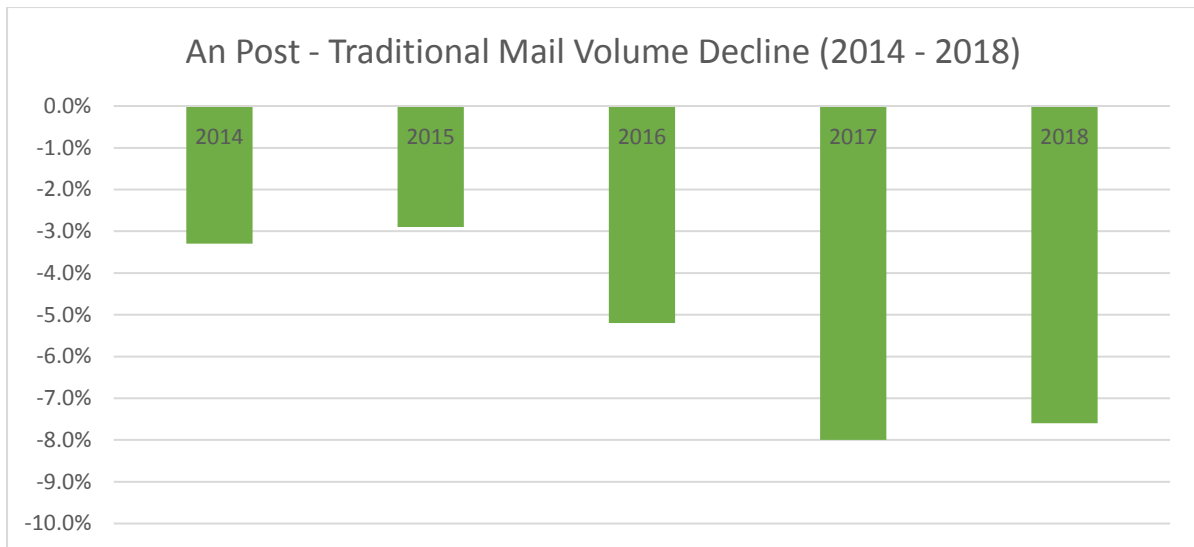
For example, in Denmark priority letters (D+1) are outside the scope of USO while the fastest USO letter product has D+5 transit times and are delivered once per week since 2018. In Italy, there are wide exemptions to five-day delivery, which is not performed in rural areas with fewer than 200 inhabitants per square kilometre and instead proceeds on an XY delivery model (week 1: delivery on Mondays, Wednesdays, Fridays; week 2 on Tuesdays and Thursdays).

As mentioned, the USO continues to be a loss-making aspect of An Post's business, with USO losses of €25.6m in 2017. Nevertheless, An Post's ability to ensure cost-reflective pricing, has meant that USO losses no longer threaten the viability of An Post. Consequently, the company has recorded a second year of solid financial improvement bringing the Group out of its loss-making position of €12.4m in 2016.

19.2 An Post view as to whether the price increases for universal postal services has changed consumers' use of the universal postal services.

Use of the universal postal service in Ireland has continued to fall year-on-year. The below chart demonstrates that fall in traditional mail volumes during a five-year period from 2014 to 2018.¹

¹ An Post Annual Reports, 2014, p. 24; 2015, p. 7; 2016, p. 4; 2017, p. 14; and 2018, p. 10.



An Post, like virtually all postal operators across Europe, has seen a significant and accelerating decline in its mail volumes in recent years, with similar or greater annual volume declines projected. An Post instituted small price increases for its 100g standard domestic letter in 2014, 2015, and 2016, moving from a base price of €0.60 to €0.68, €0.70, and €0.72, respectively, in these years. This price moved in April 2017 to €1.00, where it has remained.

As is visible from the above, even when An Post's prices sat well below the European average, the company nevertheless experienced large-scale volume decline during these years. Following an alignment of prices to the European average, and achievement of better cost-orientation in pricing in mid-2017, An Post continued to suffer volume decline.

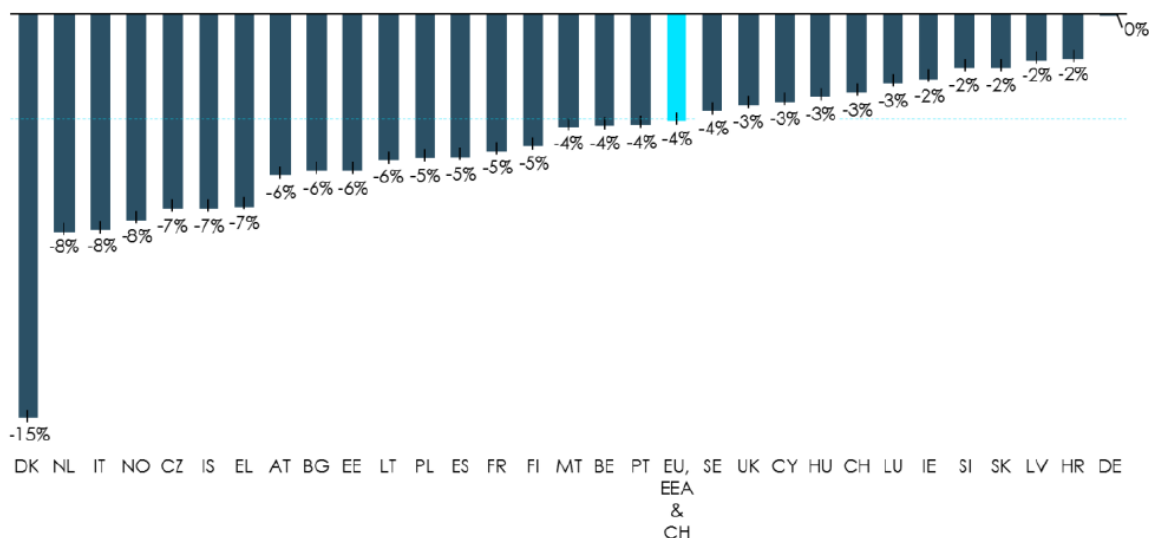
It is not possible to wholly disaggregate the effect pricing from other factors, such as an increasing proliferation of digital communications media, in its contribution to volume decline. For example, annual volume decline nearly doubled from 2015 to 2016 (-2.9% to -5.2%) despite negligible price increases in 2016. Overall, traditional mail volume has fallen by around one-quarter since 2014.

The below table, derived from Copenhagen Economics Report on Main Developments in the Postal Sector (2013-2016),² shows that, prior to the removal of the PCM, Ireland had one of the lowest rates of annual domestic letter post volume decline in Europe, at half the European average. Some acceleration in decline following recent price increases is likely attributable to Irish consumer behaviour moving to meet trends already exhibited by their European counterparts.

² H. Ballebye Okholm *et al.*, Main Developments in the Postal Sector (2013-2016): Study for the European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Copenhagen Economics, July 2018, p. 39.

Development of domestic letter post volume by country

Annual change in 2013-2016



Note: the figure includes domestic address letter post volumes. DK - data comes from PostNord annual reports. IT - data includes cross-border letters and excludes direct mail. CH - the sum of SP letters and publications.

Source: Questionnaire to NRAs; USP annual reports

It is likely, independent of pricing considerations, that traditional mail volume will continue to drop at high rates annually as greater internet access, a broader range of low-cost digital communications products, and increased IT literacy on the part of consumers, usurps to position of traditional mail as a preferred communications medium for consumers and businesses. Nevertheless, An Post is committed to providing a universal service for mails to ensure the communications needs of citizens are met, and will continue to do so sustainably, and in a manner that honours its obligations under domestic, EU, and international law.

It should also be noted that, following recent price corrections, An Post continues to be viewed as one of the most trusted companies in Ireland. In fact, An Post has been identified as one of top 10 most reputable companies in the country, according to the Ireland RepTrak® 2019 Report, based on a survey of over 7,000 members of the public.³

19.3 An Post view on the affordability of universal postal services, for example, the domestic stamped letter price of €1; and on any consequence on the socially excluded / vulnerable.

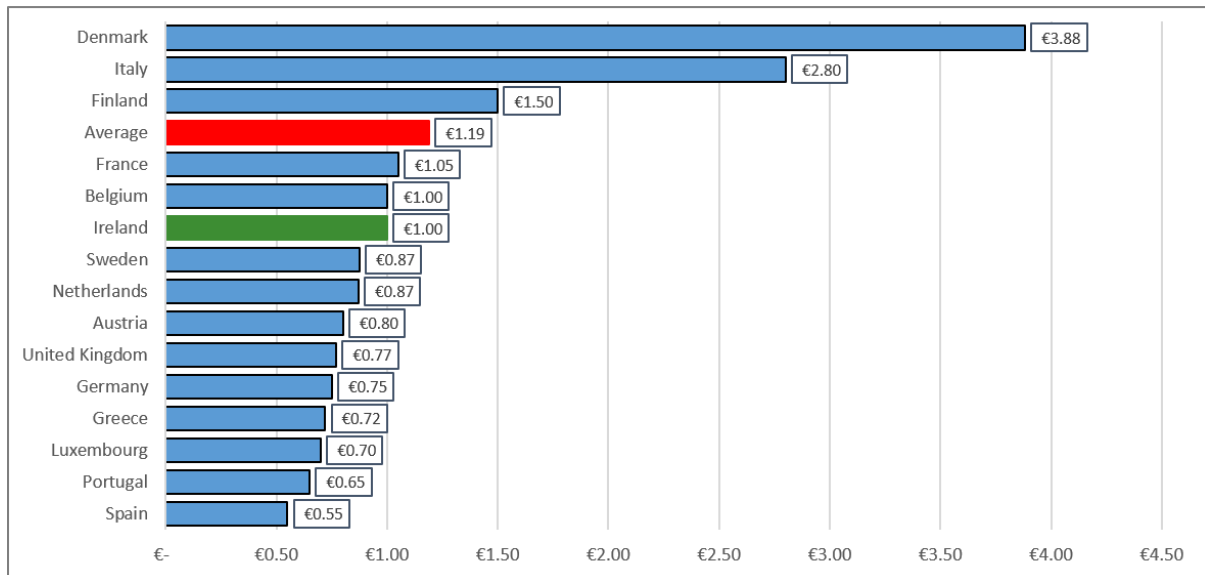
The price of a stamp for a domestic letter for next day delivery, at €1, remains competitive in European terms. As can be seen from the graph below, pricing in Ireland sits at approximately the median rate for west European countries, and €0.19 below the average. It is therefore evident that PCM removal has coincided simply with an aligning of An Post's domestic letter pricing with its European comparators.

Furthermore, according to Copenhagen Economics, 26 of 32 universal service providers increased the price of first class domestic 20g letters by 36 per cent on average in the 2013-

³ The Reputations Agency, Ireland RepTrak 2019 Report.

2016 period,⁴ while An Post raised prices by only 20% during that period. Thus, the price increase of c. 39%, from €0.72 to €1.00 in April 2017 must be seen in the context of low-level price increases during the period 2013-2016, in comparison to other European states.

Letter rates domestic next day delivery - comparators

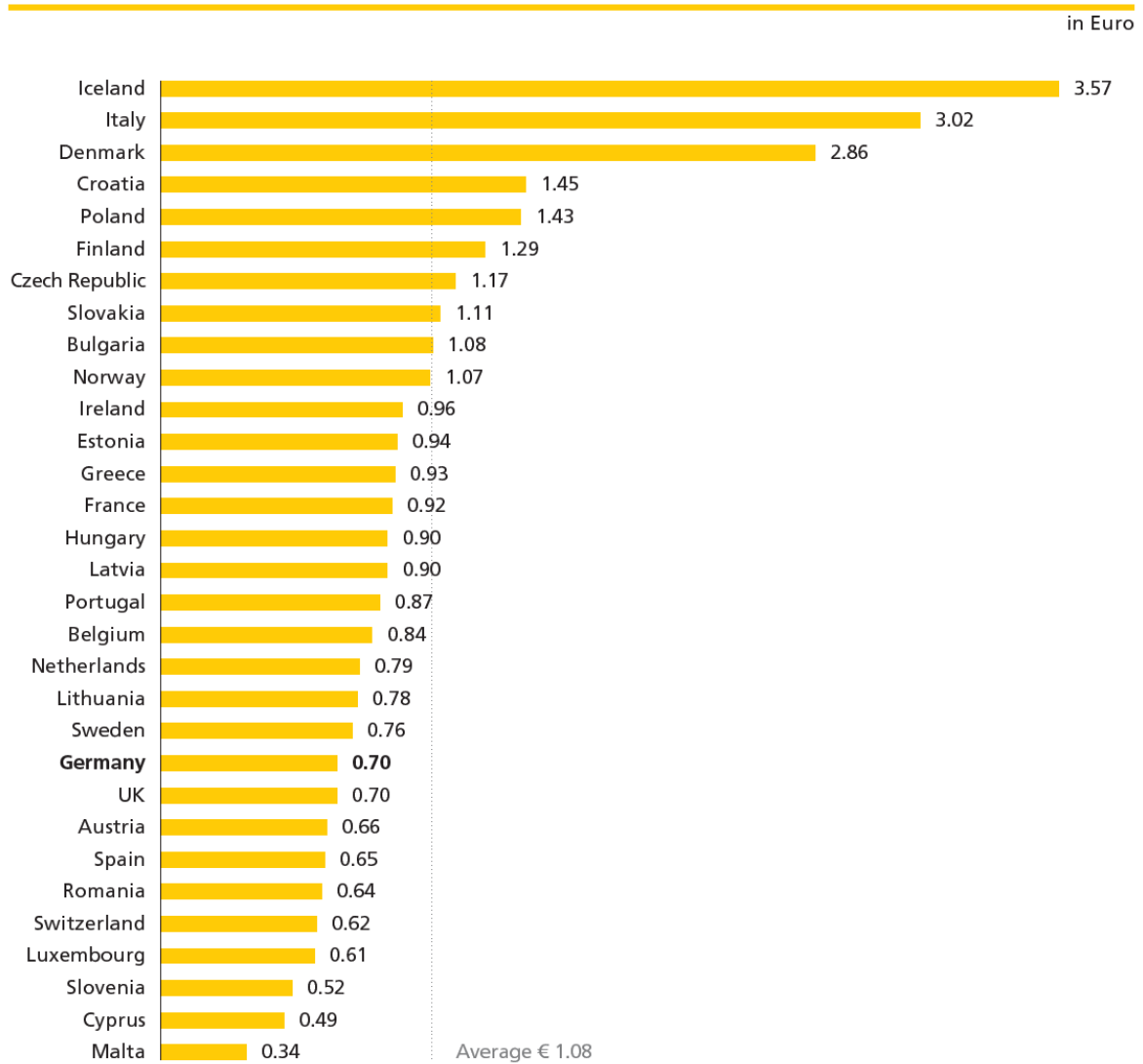


Sources: Deutsche Post, "Letter Prices in Europe", April 2018, supplemented with updated rates for any price changes since publication of that report.

The relative affordability of An Post's domestic rate for individual customers is reinforced by a purchasing power parity analysis included in Deutsche Post's 2018 Report, included below, which shows An Post's adjusted prices as sitting below the European average.

⁴ H. Ballebye Okholm et al., Main Developments in the Postal Sector (2013-2016): Study for the European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Copenhagen Economics, July 2018, p. 27.

Letter prices adjusted for purchasing power differences



Source: Deutsche Post, "Letter Prices in Europe", April 2018, p. 21.

Indeed, the Report's chief affordability metric, work minutes per letter, shows that a comparator worker needs to work for just 2.34 minutes in Ireland to earn the price of a domestic letter, well below the European average of 4.06 minutes.⁵

Additionally, the Central Statistics Office press release of 9 May on the CPI for April shows a miniscule postal spend at 0.1276.⁶

⁵ Deutsche Post, *Letter prices in Europe 17th edition: international letter price survey*, April 2018, p. 15.

⁶ Central Statistics Office, *Consumer Price Index April 2019*.

19.4 and 19.5 An Post view on any consequence on competitiveness; contract/negotiated rates; post as percentage of total costs –domestic and export; and any consequence on postal competition.

The consequences of removal of the price cap for competitiveness in the postal sector in general must take into account all aspects of this sector, in particular declining letter volumes and the pressures of e-substitution on the single piece letter service.

Where prices are charged for a service which do not bear a reasonable relation to the costs of the service, it presents an opportunity for competitors to enter the market and price accordingly. However, this has not occurred in relation to letter post since the removal of the price cap, with no new entrant arriving into the letters market since the removal of the PCM and An Post's price increases of 2017. In fact, CityPost exited the market in 2018.

This reveals an unfortunate position of the letters market in Ireland, which is that, even at these more recent higher prices, little commercial appetite appears to exist for competitors to enter an industry in which scant opportunity to generate profit exists at competitive rates, and ongoing volume decline, or market contraction, appears a steep and irreversible trend.

It must also be borne in mind that the concept of a postal market is a label often erroneously attributed to what is in fact a communications market. For a wealth of postal products effective digital or e-substitutions exist, which businesses and individual citizens may utilise to communicate. Therefore, postal products compete, not necessarily with each other in isolation, but with digital and other alternatives. In this regard, An Post is cognisant that its pricing must continue to offer value for its products to consumers, in competition with a range of digital solutions.

19.6 An Post view on any consequence for international inbound mail pricing, also known as Terminal Dues.

After the increase in the base rate to €1, An Post sought entry to the IRA-E remuneration agreement on the basis of the new increased rates, and was accordingly accepted into the agreement on the basis of achieving cost-reflective rates over a three year period to 2020.

This resulted in the terminal dues ~~XXXXXXXXXX~~ increasing over the three years from around ~~X~~ to ~~X~~. This improved, and more cost-effective price structure influences the negotiation of future bilateral agreements with other postal operators.

19.7 An Post view on the role of regulation regarding pricing matters in respect of the universal postal services; publication of RFS and cost orientation obligation.

An Post has consistently welcomed the decision to repeal the PCM, to provide the company with the freedom required to bring its postal pricing in line with its European peers and achieve cost-oriented pricing. This allows An Post to balance pricing against loss of volume on an ongoing basis, and ensure maintenance of a high level of quality of service.

Fundamentally, the PCM acted as a barrier to achieving cost-orientation in the pricing of postal products and the efficient operation of An Post's business. As an instrument, it required long-term projections of costs, volumes, and market behaviour, all of which are highly susceptible to rapid change. Requiring the completion of a prolonged regulatory process to achieve changes in postal service product pricing risks leaving the company in a position where it is

incapable of orienting its pricing to costs or service demand, and therefore endangers its ongoing financial sustainability. The current model where prices are oriented to costs in a way that responds nimbly to fast-paced market changes is appropriate and sustainable.

19.8 An Post views on other matters you consider related to the repeal of the price cap. Demographics etc.

Ireland has one of the highest proportions of people living in rural areas among the EU member states according to Eurostat, with some 42% of Irish people living in rural areas compared to an EU average of 27%, and 12% in the United Kingdom.⁷

In addition, the combination of low population density and a low number of mail items per capita in Ireland results in a higher cost per item to provide the nationwide delivery service here. This is further evidence of the requirement to correct historically low postal tariffs, which was only possible with the repeal of the PCM in March 2017.

This not only presents additional challenges and costs in the delivery of mail, it also underlines the importance of the sustainability of the USO, given its social function as an important communications medium to rural populations, who are generally older, possess fewer IT skills, and are prone to social isolation, which daily postal deliveries and collections can assist in mitigating.

Finally, the rapid on-going decline in mail volumes and the requirement for An Post to transform into a nationwide e-commerce delivery service will require further creative and substantial changes to pricing.

The scale and volatility of the market dynamics (parcel growth 30%+ p.a.) does not facilitate reliable forecasting: An Post has to have the freedom to act in an agile and timely manner to ensure customers can continue to have a world-class mail service and, with increasing necessity, a world-class parcels service.

⁷ A. McMahon, 'Ireland's population one of most rural in European Union', The Irish Times, 1 June 2016, available at: <https://www.irishtimes.com/news/health/ireland-s-population-one-of-most-rural-in-european-union-1.2667855>.

2: Tico Mail Works

Reference: Submission to ComReg document No 19/43

Tico Mail Works Response to ComReg Consultation seeking views on consequences of the repeal of the price cap on certain of the universal postal services

By email: retailconsult@comreg.ie

Introduction

Upon publication of the parliamentary bill, to remove the price cap provisions from the Communications Regulation (Postal Services) Act 2011, Tico Mail Works is on record², on 17th January 2017 at the Joint Oireachtas on Communications, Climate Action and Environment, as having opposed tariff increases for business mail. Very significant increases in the tariffs for business mail have followed the enactment of the legislation to remove the price cap.

Our concern was that in a declining postal market, with intense competition from electronic communications, it was counterintuitive to force business customers to pay more.

Tico Mail Works also successfully pressed to include in the statutory review the issue of terminal dues, for long a loss maker on inbound international mail.³

Charges for foreign postal operators for the delivery of inbound international mail are based on the headline tariff⁴. Accordingly, while we opposed increases for business mail, we were not opposed to the increase in the headline tariff as we believed that this would assist An Post in stemming the losses on its inbound international mail stream.

² https://www.oireachtas.ie/en/debates/debate/joint_committee_on_communications_climate_action_and_environment/2017-01-17/3/

³ <https://www.lobbying.ie/return/15660/tico-mail-works-ltd>

⁴ The 'headline tariff' is the price of a stamp as paid by a domestic customer for a single mail item of POP size weighing less than 100g – which currently is €1 having increased from 70c in 2017 following the removal of the price cap.

The need for urgent analysis of the effects of the removal of the price cap

We note that the ComReg consultation document⁵ does not include any analysis of what the effects have been of the abovementioned large price increases for the business mail over the past two years, which followed the removal of the price cap. We believe it is imperative for a clear understanding of the issues that such independent analysis be arranged by ComReg, in line with its usual practice when consulting on aspects of the postal business.

As part of the review process, we recommend that ComReg should initiate an investigation to confirm that the statutory requirements of sections 28 and 29 of the 2011 Act⁶ are being respected.

Tico Mail Works' experience of the removal of the price cap

Tico Mail Works has experienced significant postage tariff increases of more than 35% over the past three years. The scope for passing on these tariff increases to Tico's customers is constrained, especially at a time of very low inflation. In addition, it is our observation, based on contact with those customers, that significant increases in postage tariffs *do* lead, on the one hand, to resistance to using post and on the other hand, to incentivising the exploration of alternatives to post.

Terminal Dues

Both Tico Mail Works and ComReg have for many years been pressing An Post and the relevant Government Department (now the Department of Communications, Climate Action and Environment) to address robustly the continuing substantial losses suffered by An Post on inbound international mail.⁷ We were somewhat heartened by the ComReg blueprint for action, contained in section 14 of its June 2016 document 16/53⁸. Our understanding is that significant efforts are being made by all parties and in particular, by An Post to remedy the situation and this is to be welcomed. We have, however,

⁵ [file:///C:/Users/admin/Downloads/ComReg-1943%20\(3\).pdf](file:///C:/Users/admin/Downloads/ComReg-1943%20(3).pdf)

⁶ <http://www.irishstatutebook.ie/eli/2011/act/21/enacted/en/html>

⁷ We know that An Post has, since as early as the year 2000, but perhaps earlier, suffered losses every year of the order of €20m on this mail stream (letters, packets and parcels sent to Ireland by foreign postal operators for delivery by An Post under three main agreements (1) a bi-lateral with Royal Mail (2) the REIMS agreement with most other EU member states and (3) the UPU terminal dues agreement with all other member of the United Nations

⁸ [file:///C:/Users/admin/Downloads/ComReg1653%20\(12\).pdf](file:///C:/Users/admin/Downloads/ComReg1653%20(12).pdf)

been disappointed at the lack of any substantial reports on progress in advancing the position and we would urge ComReg to prepare a follow up document as soon as possible.

In the absence of reporting on progress with steps to stem inbound international mail losses and on the effects, if any, of the removal of the price cap on terminal dues, we can only point to the most recently published An Post regulatory accounts (which are for 2017⁹) which show an alarming jump in these losses on the international inbound mail stream to €25.753m.

Tico Mail Works has warned about the danger of “mail leakage” to other jurisdictions, which dangers must be increased by the very large tariff hikes over the past two years. It seems unconscionable that neighbouring foreign postal service providers may be able to secure cheaper rates for posting to Ireland than Irish postal service providers.. It also seems that the requirement for non-discrimination in tariffs, prescribed by sections 28 and 29 of the 2011 Act, is possibly being breached.

The review process prescribed by Section 2 of the Communications Regulation (Postal Services) (Amendment) Act 2017¹⁰, which includes the effect on terminal dues, presents an ideal opportunity for ComReg to comprehensively revisit the issue of terminal dues and, at the very least, provide an up to date report on progress.

We would take this opportunity to refer to the forthcoming Extraordinary Congress of the United Postal Union in Berne, on 24 and 25 September 2019. The Congress will consider the future of terminal dues for all member states, including Ireland. This is an ideal opportunity for Ireland to continue with the follow up on the ComReg blueprint in 16/53 by inputting into policy formation on terminal dues at the highest international level. We suggest that the Irish delegation to the Congress be a fully representative one, with the State, the USP, the Regulator and representatives of stakeholders attending to show a united front.

We also suggest that representation at the negotiations between An Post and the Royal Mail, and also with the other signatories of the REIMS agreement should also include such stakeholders.

⁹ <https://www.anpost.com/AnPost/media/PDFs/Regulatory%20Reports/An-Post-Regulatory-Accounts-2017-Summary.pdf>

¹⁰ <http://www.irishstatutebook.ie/eli/2017/act/3/enacted/en/print.html>

While we recognise that An Post is a commercial organisation which rightly makes its own decisions, support from the State, the regulator and stakeholders will, no doubt assist it in difficult international, EU and bilateral negotiations.

The effect of price increases on the future of the mails business

The current ComReg consultation document 19/43¹¹, at page 6, states that the “issues” for seeking a review of the price cap (which review was subsequently truncated and ended in the removal of the price cap) were as follows:

- Efficiency target of 2% per annum was not met
- Pay increases not factored into price cap as An Post had not forecast these pay increases
- Actual volume declines were greater than forecast.

While acknowledging the research and preparation undertaken by An Post and its advisers, one must question whether proceeding with price increases on this basis is the optimum way to proceed. In any business sector, where one has identified that demand is declining and costs are rising, implementing significant price increases will, most likely, lead to further decline in that business. The exception just might be where the market is captive and a monopoly, or near monopoly, exists. The problem is that, inevitably, customers prove not to be as captive as one might suppose. In this instance, one clear alternative for those ‘captive’ customers is e-substitution. Moreover, a key rationale for having the universal service provider subject to a regulator is to prevent monopoly pricing where, as in this case, the regulator has identified a lack of competition. That is why the price cap was in place.

Tico Mail Works cannot, of course, adopt a policy of automatically recovering tariff increases.. The road being travelled here could be catastrophic for our company, which provides employment for some forty people. Should we fail as a business, then one existing element of the limited competition in the mails business will have been removed.

¹¹ [file:///C:/Users/admin/Downloads/ComReg-1943%20\(4\).pdf](file:///C:/Users/admin/Downloads/ComReg-1943%20(4).pdf)

A little positive action - one step that can't hurt and might do some good

The Keep Me Posted campaign which has been in place in the UK for several years, initiated and strongly supported by Royal Mail, advocates for the consumer's right to choose paper communications without penalty – see website www.keepmeposteduk.com.

There is also a European dimension – see the website www.keepmepostedeu.org. This website includes a drop down box “*In your Country*” showing what initiatives are being taken. Sadly, the entry under “*Campaigns*” for Ireland is “*No national campaign at this stage*”

We would ask An Post, as the lead player in the Irish postal business, to help remedy this “*No national campaign*” entry. As a start, An Post could use its resources to establish an Irish Keep Me Posted website and Tico Mail Works will certainly play its part in driving the campaign forward¹².

Forthcoming ComReg statutory review

Tico Mail Works looks forward to ComReg's forthcoming statutory review. While acknowledging the time constraints it is operating under, it would be useful if ComReg could release a draft report for comments by interested parties, before its final submission to the Minister.

END

¹² We have reserved the website www.keepmepostedie.org which we will offer as part of our contribution to this campaign.



Who are Tico Mail Works?

Tico Mail Works is a an ISO 9001 and ISO 27001 certified bulk mail producer and ComReg authorised postal service provider, producing and posting over 250,000 pieces of personalised mail every week for government, semi state, financial, utility and retail customers.

We describe ourselves as world class, customer focused, problem solvers, delivering a quality service at a fair price, honestly and transparently.

We aim to produce and post every piece of mail on time and without error. Our motto is *'We give our customers peace of mind'*.

Sustainability and Corporate Social Responsibility are particularly important to our business which is based on four pillars (1) Customers and Suppliers, (2) Staff, (3) The Environment, (4) The Community and underpinned by the 17 United Nations Sustainable Development Goals.

For further information please see our Sustainability Report available on our website www.ticomailworks.ie.

3: Chambers Ireland



**Chambers
Ireland**
Advancing business together

**Chambers Ireland's Submission to the Communications
Regulator regarding the consequences of the repeal of
the price cap on the universal postal services**

April 2019

Chambers Ireland is the largest business network in the State. With members in every geographic region and economic sector in Ireland, we are well positioned to understand the concerns of businesses and represent their views.

An Post is an important national organisation that plays a vital role in providing services throughout the country and is an vital factor in the services provided in local economies.

- 1) The removal of the Price Cap allowed An Post to establish tariffs that had remained artificially below cost for many years. This effectively saved the company and sustained the provision of the universal postal service for customers in Ireland into the future. It is vital that this measure was taken to ensure the service could be maintained to an adequate level.
- 2) An Post are now on a sure financial footing as demonstrated in the last set of financial results released by the organisation which can be directly linked to the price cap. This turn around by the organisation has allowed them to improve their normal services to customers and businesses. They have also been able to broaden the services they offer.
- 3) Tariffs in Ireland are clearly average when compared to services provided by postal services in other countries.
- 4) The cost of delivery in Ireland is well above average in Europe. The average # items delivered per Km² in Ireland is 5.8k, whereas this is 43.5k in our closest neighbour in the UK. There is over 7 times the density of population. This is unlikely to change in the greatly in the next few years.
- 5) There has been no impact on competition. In fact, higher rates in the market should stimulate competition as this makes the market more attractive for other companies to enter. The market has now been shown to be commercially viable through the turnaround of the incumbent company in the market.
- 6) There was a recent rebrand of the main Postal service in Ireland. This has been broadly welcomed in Ireland along with the enhanced service they are now providing.