



An Coimisiún um
Rialáil Cumarsáide
Commission for
Communications Regulation

Code of Practice for Complaint Handling

Minimum Requirements for Postal Providers

Submissions to Consultation ComReg 26/03

Reference: ComReg 26/34s

Date: 29/05/2026

Submissions Received from Respondents

Document No:	ComReg 26/34s
Date:	29 May 2026

Related Publications	Document Number
Consultation:	ComReg 26/03
Response to Consultation:	ComReg 26/34 D06/26

Redacted Information

In this document, ComReg has maintained the confidentiality of certain information, in accordance with ComReg's guidelines on the treatment of confidential information¹ (the "Confidentiality Guidelines"). The relevant information has been redacted and a [X■X] symbol has been inserted.

¹ "ComReg's Guidelines on the treatment of confidential information", Document No. 05/24, 22 March 2005, <https://www.comreg.ie/publication-download/response-to-consultation-guidelines-on-the-treatment-of-confidential-information>

Content

Section

1. An Post

NON-CONFIDENTIAL

1. An Post

NON-CONFIDENTIAL

An Post Submission to ComReg's Code of Practice for Complaint Handling: Minimum requirements for postal service providers

(20/02/2026)

Introduction

ComReg published a consultation for its Draft Code of Practice for Complaint Handling (ComReg 26/03) on 16 January 2026 and is calling for responses from relevant stakeholders.

An Post welcomes a revision for the Code of Practice for complaints handling that each postal service provider has in accordance with Section 43 of the Communications Regulation (Postal Services) Act 2011.

An Post welcomes the opportunity to contribute and wishes to provide a number of comments for ComReg to consider when shaping the draft procedures.

Q1: Do you have any comments on the proposed approach ComReg has set out in Chapter 4 or other comments on this chapter? Please explain the basis of your response in full, referring to the appropriate paragraph number and provide any relevant information to support your response.

An Post Response

Please see our comments below in relation to Chapter 4 The first point of contact for complaints

4.2 Timeframe to make a complaint

Paragraph 103 outlines research which details the period in which a complaint can be submitted in other countries.

"ComReg notes from codes of practice it has reviewed that this can range from just a few days up to 6 months in Ireland. ComReg notes from research it has

undertaken (Cullen 2025) that in other countries, periods within which complaints can be made can be up to 12 months or more”.

A review of *End User Complaints: Procedures and Dispute Resolution* (Cullen, 2025) by An Post shows that only 5 of the 22 countries surveyed allow complaints to be submitted within 12 months of posting an item.

In contrast, 5 countries (Latvia, Lithuania, Romania, Spain and Sweden) require complaints to be made within 6 months, and Luxembourg requires submission within 5 days of identifying an irregularity. Croatia requires a complaint be made within 3 months from the date of sending the item.

The remaining countries in the sample provided no defined timeframe in their responses. As such, the data does not support the suggestion that complaint periods of 12 months or more are common internationally.

Paragraph 109 outlines ComReg’s proposal in relation to the timeframe in which a complaint can be submitted after the date of posting.

“ComReg proposes that the procedures, standards and policies with respect to the handling of complaints from users in the code of practice drawn up, and to be implemented, by providers make provision for allowing complaints to be made by a user to the provider for a period of no less than 12 months from the date of posting of the postal packet.”

An Post do not support the proposed 12-month complaint window. Our current 6 month timeframe aligns with common European practice and reflects the period within which meaningful investigations can be carried out.

Evidence and operational data become increasingly unavailable as time passes, and the likelihood of resolving a complaint either domestic or international is extremely low after 6 months.

Delivery-related issues are most often identified immediately and reported quickly, after 6 months elapsing there would be almost no action we could take to resolve such complaints effectively.

We can only open an international investigation within 6 months of the date of posting as postal operators accept inquiries only within this timeframe.

For standard post, issues regarding items must be reported within three months, after which locating them is no longer feasible.

Allowing complaints to be submitted beyond 6 months and up to 12 months may create a customer expectation that we will be able to conduct a meaningful and thorough investigation, whereas in reality our capacity to do so will be severely limited. This risks creating unrealistic expectations around the complaint review process and could ultimately lead to greater customer frustration.

For these reasons, we strongly caution against extending the complaint period to 12 months, as it offers minimal benefit to users and falls outside the timeframe in which effective investigation is feasible.

Q2: Do you have any comments on the proposed approach ComReg has set out in Chapter 5 or other comments on this chapter? Please explain the basis of your response in full, referring to the appropriate paragraph number and provide any relevant information to support your response.

An Post Response

Please see our comments below in relation to Chapter 5 A means of recording complaints

5.1 Information to be recorded

Paragraphs 113-117 outlines ComReg's proposals regarding the capturing of complaints, the issuing of a complaint acknowledgement/complaint reference number and the logging/tracking of a complaint through the resolution process.

An Post would like to highlight to ComReg the rapidly changing landscape of customer service and the means by which customers are making contact to report or log a complaint with a provider. The vast majority of contacts received by An Post are via

our digital channels. These are far more convenient and accessible to the average customer. As such, our below response is tailored around the objective of achieving a higher quality, more efficient level of customer service which will benefit the consumer and also the providers ability to adequately and fairly resolve a complaint.

113. *“ComReg is aware from the 13F Information that some providers have Customer*

Relationship Management (“CRM”) systems in place that record complaints and other information related to such complaints. These systems may generate a unique reference number for the complaint once it is logged. In general, such systems serve to collate all information relating to the complaint and assist in managing and tracking the progress of the complaint from the first point of contact to the resolution of the complaint.”

114. *“Regardless of the technology used, ComReg is of the view that all providers should be able to demonstrate how they record, log and track complaints made to them by users. This process will ensure users are kept up to date as to the status of their complaint on a regular basis - even if no progress has been made at a particular stage of the complaints handling process.”*

An Post is committed to ensuring that customer complaints are recorded, triaged, and resolved through channels that are accurate, efficient, secure, and fully aligned with regulatory expectations. As part of ongoing service modernisation, we are significantly expanding our digital access points within an Omni-Channel model to improve customer experience and operational effectiveness.

We note ComReg outlines the importance of ensuring that complaint-handling channels support accessible and reliable recording of customer issues. In line with this, An Post wishes to highlight how our digital-first model provides a more robust and compliant alternative.

115. *“ComReg is aware that in some instances users are provided with a unique complaint*

reference immediately following their complaint being notified to a provider (e.g. via auto-response email to an online form). ComReg is also aware of difficulties experienced by users in obtaining a complaint reference."

116. *"It can be problematic for users if they are not provided with a unique complaint reference, especially those who have need to re-contact their provider about the complaint but are unable to evidence any prior interaction with the provider. This can result in users having to recommence the process."*

117. *"However, ComReg is cognisant that it may not always be possible for a unique complaint reference to be immediately issued following a user submitting a complaint e.g. if a complaint is submitted out of hours or sent via a non-real time complaint channels. To mitigate against this ComReg is of the preliminary view that a provider must make provision for in its code of practice, and implement, a procedure that ensures that users are issued with a unique complaint reference to record a complaint made as soon as practicable, but in all instances within a maximum timeframe of 2 working days from the day on which the complaint is first notified to the provider. ComReg notes from the 13F Information that many providers are already providing unique reference numbers to users making complaints."*

Our digital-first approach provides a quicker, more streamlined complaint procedure designed to improve both customer experience and regulatory compliance:

- Automated data validation at entry, reducing the likelihood of missing or inaccurate information.
- Real-time routing and triage, ensuring cases reach the correct operational team without manual intervention.
- Immediate logging, which accelerates response timelines and strengthens adherence to statutory requirements under Section 43.
- Full auditability, as digital channels generate consistent, timestamped, retrievable records across all submission types.
- Improved accessibility, supporting customers who prefer digital engagement and aligning with evolving customer expectations.

Digital channels also reduce the risk of inconsistent or incomplete records one of the core concerns ComReg identifies when discussing minimum complaint-handling standards.

118. *ComReg proposes that the procedures, standards and policies with respect to the handling of complaints from users in the code of practice drawn up, and to be implemented, by providers make provision for the following matters in relation to the means of recording of a complaint:*

118.1. *the minimum information to be recorded in relation to a complaint, which must*

include:

(i) the complainant's name and contact details, including a phone number (as applicable);

(ii) the date the complaint was made by the user and dates of all communication throughout the life cycle of the complaint up to and including the date the complaint is finally closed;

(iii) a copy of any written complaint or notes made from any communication with the complainant relating to the complaint; and

(iv) all communications with the complainant including copies of:

(a) the complaint,

(b) any response to the complaint,

(c) any determination in respect of the complaint and

(d) any documentation considered in the course of such determination.

118.2. *a clear statement that the provider will generate a unique complaint reference for each complaint notified by a user to it and provide this to the complainant within a maximum timeframe of 2 working days from the day on which the complaint is first notified to the provider.*

An Post's new Omni-Channel digital technology will deliver a far more efficient and responsive complaint-support experience. Through integrated channels including AI-assisted triage, digital messaging, and enhanced case-capture tools. Customers will receive quicker acknowledgement, faster routing, and earlier resolution than at present.

Our Omni-Channel will also have our existing telephone and written means of contact incorporated into it. These channels will still be available to customers who may have accessibility issues or prefer these means of contact, however we will be more effectively able to log and manage these which will shorten resolution times.

Our Omni-Channel platform enables:

- Immediate case creation with validated data fields, reducing back-and-forth clarification.
- Real-time visibility of customer interactions, ensuring no information is lost between channels.
- Automated prioritisation and routing, shortening resolution timelines.
- Consistent complaint categorisation, improving the accuracy and reliability of records.

By reducing reliance on generic self-service web forms and shifting toward smarter digital channels, we avoid misclassification and ensure higher-quality complaint data. This directly supports ComReg's points regarding reliability, accessibility, and completeness of complaint records, while also supporting faster and more effective customer resolution.

Q3: Do you have any comments on the proposed approach ComReg has set out in Chapter 6 or other comments on this chapter? Please explain the basis of your response in full, referring to the appropriate paragraph number and provide any relevant information to support your response.

An Post Response

Please see our comments below in relation to Chapter 6 Responding to complaints and resolving disputes

6.2 Complaint response

Paragraph 134 details ComReg's proposal that a final response be issued to the complainant 20 working days after the complaint was originally raised.

"ComReg is also of the view that it would be good practice for a provider to keep a complainant up-to-date should a complaint take longer to resolve than 20 working days after the date on which the complaint was first made."

We note ComReg's view regarding updating complainants after 20 working days. However, this timeframe is not operationally achievable. International investigations cannot be concluded within 20 days, as UPU procedures and agreements permit up to 60 days for partner postal operators to respond and for the case to be resolved. We are bound by these timelines and therefore cannot issue a final resolution sooner. Our existing 30-day (domestic) and 60-day (international) timeframes remain the only realistic but also reliable periods within which a thorough and accurate investigation can be completed.

6.4 Resolving a dispute

Paragraph 159 outlining a customer can escalate a dispute/complaint to ComReg after 20 working days.

"Nothing in this consultation prevents the provider from continuing to attempt resolution after 20 working days. Indeed, even if a dispute is referred to ComReg for resolution, there are obvious reasons why it may be in both parties' interests for the provider to continue to attempt resolution. ComReg's dispute resolution procedures enable a dispute to be withdrawn by a user post-referral, and this mechanism can be utilised where agreement is reached between the parties."

We note ComReg's view that providers may continue to pursue resolution beyond 20 working days and that users may escalate to ComReg at any point. However, we do not support introducing a 20-day expectation for resolution or escalation. Many complaints, particularly those involving international mail, cannot be resolved within 20 working days due to UPU-mandated timelines of up to 60 days, and the proposed threshold does not reflect these operational constraints.

An Post already provides clear information on escalation routes, including ComReg's contact details, and does not impede users from escalating at any stage. Our internal

process is appropriately structured and should remain unchanged; customers may choose to escalate early, but this should not drive amendments that encourage bypassing established complaint-handling steps.

Accordingly, no change is required to our existing procedures, and we maintain our position that the proposed 20-day standard is not practicable.

Q6: Do you have any comments on the proposed approach ComReg has set out in Chapter 9 or other comments on this chapter? Please explain the basis of your response in full, referring to the appropriate paragraph number and provide any relevant information to support your response.

An Post Response

Please see our comments below in relation to Chapter 9 Retention of records of complaints

Paragraphs 187-190 proposing retention of records of complaints which includes voice/call recordings.

187. *"ComReg is of the view that the records that providers are required to retain under section 43(1)(g) include not only hard copy written records but also electronic records including audio recordings. There is no definition of "record" in the 2011 Act. The 2002 Act is construed as one with the Communications Regulations Acts 2002 to 2023. The Communications Regulation and Digital Hub Development Agency (Amendment) Act 2023 contains a definition of a "record"⁷⁴ that includes data and recordings (whether of sound or images or both) and information held manually, mechanically, digitally or electronically."*

188. *"Other statutory definitions of "records" are similarly broad. For example, the definition in Section 2 of the Freedom of Information Act 2014. includes– "...(c) a disc, tape or other mechanical or electronic device in which data other than visual images are embodied so as to be capable, with or without the aid of some other mechanical or electronic equipment, of being reproduced from the disc,*

tape or other device, ... (e) a copy or part of any thing which falls within paragraph...(c)"

189. "A voice recording, which is audio data, falls within this definition."

190. "In ComReg's view, record retention should not be different across different complaint handling channels. Users raising complaints by telephone, for example, should not be in any worse position in terms of the retention of records than a user making a complaint through a different complaint handling channel."

We note ComReg's view that "records" under section 43(1)(g) encompass electronic data and audio recordings. While we understand the intention to ensure consistency across complaint-handling channels, any retention requirements must remain compliant with GDPR storage-limitation and data-minimisation principles.

An Post already applies proportionate retention measures. Email addresses and phone numbers are partially redacted after a set period, now reducing to 90 days, without impacting our ability to investigate complaints, which rely on tracking numbers rather than contact-detail fields. CCTV footage is retained for a maximum of 30 days, in line with national standards, and we intend to reduce call-recording retention to six months, reflecting concerns raised by the Data Protection Commission. We would like to reduce the call-recording retention to meet the data minimisation GDPR principle.

Given the DPC's position on retention of high-risk data such as CCTV and call recordings, we request that ComReg consult the DPC to confirm that any proposed extended retention periods - particularly for audio recordings - are fully compatible with GDPR. Until such clarification is provided, we consider our current and planned retention policies to be proportionate and compliant while supporting effective complaint investigation.



Áras Exo
Cé an Phoirt Thuaidh
Baile Átha Cliath 1
D01 W5Y2

Exo Building
North Wall Quay
Dublin 1
D01 W5Y2

+353 1 705 7000
anpost.com

In conclusion:

An Post remain fully committed to meeting our obligations in relation to the customer complaints redress process. However, it is essential that any regulatory developments, whether through new reporting requirements or more prescriptive operational rules strike the right balance. Regulation should meaningfully enhance customer outcomes without imposing disproportionate financial or administrative burdens on postal operators. Striking this balance is essential to preserving an effective regulatory environment that supports both customer needs and operational sustainability.