

PRONÚNCIA DOS CTT

SENTO PROVÁVEL DE DECISÃO RELATIVO AOS VALORES DOS INDICADORES DE QUALIDADE DE SERVIÇO VERIFICADOS PELOS CTT EM 2018

1. INTRODUÇÃO

1. O Conselho de Administração da ANACOM aprovou, em 09.05.2019, o Sentido Provável de Decisão Relativo aos Valores dos Indicadores de Qualidade de Serviço Verificados pelos CTT em 2018 ("SPD").
2. De acordo com o SPD, com base na informação disponível sobre os valores atingidos pelos CTT – Correios de Portugal, S.A. ("CTT"), no ano de 2018 os valores dos IQS2 (demora de encaminhamento no correio azul no Continente) e IQS7 (demora de encaminhamento no correio transfronteiriço comunitário D+3) — de acordo com os objetivos de desempenho associados à prestação do Serviço Postal Universal ("SPU"), aprovados pelas deliberações do Conselho de Administração de 30.12.2014 e de 13.03.2015, — não atingiram os valores objetivo e os valores mínimos definidos para o ano.
3. Por esta razão, a ANACOM propõe-se ativar o mecanismo de compensação, previsto no artigo 47.º da Lei Postal e no artigo 7.º da deliberação da ANACOM de 30.12.2014, e determinar aos CTT que apliquem uma dedução de 0,085 pontos percentuais à variação média ponderada dos preços do cabaz de serviços de correspondências, encomendas e correio editorial, permitida para o ano de 2019, devendo a referida dedução beneficiar a universalidade dos utilizadores daqueles serviços.

2. COMENTÁRIOS DOS CTT

4. A decisão objeto do SPD em apreço resulta da aplicação automática do mecanismo de compensação previsto nas disposições acima indicadas e descrito no Apêndice 2 da deliberação de 30.12.2014, seguindo o método de cálculo descrito no mesmo Apêndice.
5. Não obstante, e em especial no respeitante à aplicação da penalização pelo incumprimento do IQS7, entendem os CTT, com o devido respeito, que o atual SPD traduz uma leitura demasiado formalista e literal das deliberações da ANACOM que fixaram os objetivos de desem-

penho associados à prestação do SPU para o ano de 2018, razão pela qual, no seu entender, o mesmo não se mostra adequado e deveria ser revisto.

6. Com efeito, a ANACOM propõe a penalização dos CTT pelo incumprimento do IQS7 (demora de encaminhamento no correio transfronteiriço intracomunitário em D+3) quando, conforme já entendeu no passado (em especial na deliberação de 12.07.2018, que fixou os parâmetros de qualidade de serviço e os objetivos de desempenho associados à prestação do SPU para o triénio 2018-2020), os valores realizados no âmbito deste IQS não dependem apenas dos CTT.
7. E, para além disto, o SPD desconsidera, injustificadamente, os resultados francamente positivos que foram alcançados em relação à generalidade dos IQS, que excederam largamente os valores mínimos e objetivos fixados.

2.1. Penalização pelo incumprimento do IQS 7 (correio transfronteiriço intracomunitário)

8. Conforme referido, a ANACOM propõe no SPD penalizar os CTT pelo incumprimento do IQS7. Como se sabe, este IQS corresponde a um indicador ponta-a-ponta, que mede demoras de encaminhamento desde a aceitação, no país de origem, até à entrega ao destinatário, no país de destino.
9. Os resultados deste indicador não são, assim, de responsabilidade exclusiva dos CTT, estando as demoras de encaminhamento dos objetos em questão também dependentes da performance de outro operador postal responsável por parte do fluxo (*inbound* ou *outbound*) e sujeitos a ajustes operacionais e alterações de *standards*, por parte de outros operadores, que não são controlados pelos CTT. Sobre este aspeto, vejamos os valores e a respetiva evolução em maior detalhe.
10. Desde logo, na publicação do International Post Corporation (“IPC”) sobre o sistema de medição *Unipost External Monitoring System* (“UNEX”), módulo CEN, referente ao ano de 2018 (enviada à ANACOM em 28.03.2019 e agora em anexo para facilidade de consulta), mantém-se a indicação de que as performance em D+3 têm vindo a apresentar uma tendência decrescente desde 2013, indicando como principal razão desta tendência as necessárias adaptações dos modelos operacionais dos operadores postais e os consequentes ajusta-

mentos efetuados nos standards de qualidade domésticos, na sequência do progressivo declínio dos volumes de tráfego postal.

11. Relativamente aos resultados 2018, na referida publicação (pág. 3), o IPC apresenta a performance a nível europeu para as entregas até D+3 e D+5 para os diferentes grupos de países alvo do sistema de medição UNEX:

	UNEX-18 ¹	UNEX-29 ²	UNEX-32 ³
J+3, speed indicator	76.1%	78.2%	78.7%
J+5, reliability indicator	89.1%	93.7%	94.4%

- 1) UNEX-18 covers the 15 EU countries before the May 2004 enlargement: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal, Spain, Sweden and the United Kingdom together with Iceland, Norway and Switzerland (the latter as a destination only from 2018 onwards).
- 2) UNEX-29 covers 29 countries with the extension of the UNEX-18 group in 2005 to the new EU member countries: Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia and, in 2018, Malta and Romania as destination countries.
- 3) UNEX-32 covers UNEX-29 extended to Bulgaria and Croatia, i.e. the 2018 EU membership of 28 member states along with Iceland, Norway, Serbia and Switzerland (the latter as a destination only from 2018 onwards).

12. No caso português, no ano de 2018, as performances para as entregas até D+3 e D+5 a nível do correio transfronteiriço intracomunitário foram, respetivamente, 78,7% e 95,4%, tendo subjacente a informação constante no relatório do IPC sobre resultados UNEX 2018 para Portugal (conforme documento em anexo¹) e as ponderações utilizadas em 2018 para o correio *oubound* (43,61%) e correio *inbound* (56,39%).
13. Deste modo, considerando a percentagem global de entregas até três dias do UNEX-29 (grupo de países idêntico ao universo UE 28), que foi de 78,2%, e o resultado obtido a nível correio transfronteiriço intracomunitário D+3 no caso português (IQS7), que foi de 78,7%, pode constatar-se que Portugal apresentou em 2018 uma performance acima da média.
14. Resulta assim claro que o resultado *end-to-end* obtido para o IQS7 foi penalizado pela performance dos demais operadores, pelo que o cumprimento deste IQS não está na esfera de controlo dos CTT.

¹ Este documento deve ser considerado confidencial uma vez que contém informações sujeitas a segredo de negócio.

15. Precisamente por esta razão a ANACOM considerou, na deliberação de 12.07.2018, que este IQS não deveria revelar para efeitos de ativação do mecanismo de compensação, referindo na pág. 24 o seguinte: "*No entanto, tendo em conta que os valores realizados dependem não apenas dos CTT mas também dos restantes prestadores de serviço nos restantes países, os indicadores referentes ao correio transfronteiriço intracomunitário passam a ter como objetivo primordial a monitorização dos níveis de qualidade nos envios com origem ou destino em Portugal, deixando de relevançar para efeitos de aplicação do mecanismo de compensação aos utilizadores, previsto no capítulo 7, a ativar em caso de não se atingirem os objetivos de desempenho definidos*" (sem sublinhado no original).
16. Conforme tiveram já oportunidade de apresentar à ANACOM, os CTT concordam inteiramente com o racional ora exposto: de facto, sendo este um indicador cujos resultados não são do exclusivo controlo dos CTT, é injustificado e desrazoável que o mesmo seja considerado para efeitos de ativação do mecanismo de compensação.
17. Tal ocorreu, desde logo, na pronúncia dos CTT, de 28.05.2018, no âmbito do sentido provável de decisão, de 03.05.2018, relativo aos valores dos indicadores de qualidade de serviço verificados em 2017, quando, apesar de não terem sido ainda aprovados os novos indicadores de qualidade do SPU, já constava do respetivo projeto de decisão (de 11.01.2018) a consideração de que o IQS7 não deveria revelar para efeitos de aplicação do mecanismo de compensação aos utilizadores.
18. Considerou a ANACOM, na pág. 7 do relatório da audiência prévia relativo a esse projeto de decisão, de 21.06.2018, o seguinte: "*relativamente ao argumento apresentado pelos CTT de que na proposta de revisão as parâmetros de qualidade de serviço de 11.01.2018, a ANACOM foi sensível ao facto de as demoras de encaminhamento de correio transfronteiriço intracomunitário estarem dependentes do desempenho de outros operadores postais responsáveis por parte do fluxo, referindo que este IQS em particular não deveria revelar para efeitos de ativação do mecanismo de compensação, salienta-se que a referida proposta de revisão ainda não se encontra em vigor, pelo que, do ponto de vista regulatório, a ANACOM rege-se pelas regras atualmente em vigor, ou seja, pelos «Parâmetros de qualidade de serviço e objetivos de desempenho associados à prestação do serviço postal universal» fixados na decisão da ANACOM de 30.12.2014*" (sem sublinhado no original).

19. Na altura, ou seja, em junho do ano passado, o motivo para não se atender ao argumento avançado pelos CTT foi, ao que tudo indica, a circunstância de a deliberação que veio fixar os novos parâmetros de qualidade do SPU ainda não ter sido aprovada. Atualmente, tal deliberação já foi aprovada, em 12.07.2018, e faz parte do acervo jurídico relevante na matéria, pelo que, no entender dos CTT, não pode agora deixar de ser considerada.
20. Como referido, nessa deliberação de julho de 2018 a ANACOM considerou que o IQS7 deveria ser desconsiderado para efeitos de ativação do mecanismo de compensação pelo facto de não depender apenas dos CTT o cumprimento dos objetivos de desempenho impostos. No entender da ANACOM, o indicador em causa passaria a ser utilizado, única e exclusivamente, para monitorizar os níveis de qualquer nos envios com origem ou destino em Portugal. Neste quadro, não se alcança os motivos que levam à manutenção da relevância deste IQS para penalizar os CTT.
21. Dirá a ANACOM que as regras constantes da deliberação de 12.07.2018 apenas se aplicam a partir de 2019 e que, por isso, a desconsideração do IQS7, nos termos a que se tem feito referência, apenas deverá valer também a partir de 2019. Os CTT consideram, contudo, que tal não é – não pode ser – assim. E por vários motivos.
22. *Por um lado*, porque, conforme resulta da pág. 109 do relatório de audiência prévia relativo à deliberação de 12.07.2018, a circunstância desta decisão apenas se aplicar a partir de 2019 tem como fundamento: (i) a necessidade de definir um período de (extensa) alteração da organização interna e operacional dos CTT; (ii) a adaptação dos procedimentos de medição da qualidade de serviço e (iii) assegurar maior coerência na medição dos vários IQS, novos e antigos.
23. Ora, a desconsideração do IQS7 para efeitos de ativação do mecanismo de compensação em nada exige uma adaptação dos CTT, sendo, tão-só, uma medida que vem dar corpo a uma realidade já sentida há vários anos, conforme destacado pela própria ANACOM. De resto, tratando-se de uma medida favorável aos interesses dos CTT, poderia ser sempre, nos termos gerais, aplicável imediatamente.

24. Portanto, entendem os CTT que se pode legitimamente defender que a desconsideração do IQS7 para a ativação do mecanismo de compensação deveria entrar em vigor imediatamente e beneficiar a posição dos CTT, sendo esta conclusão reforçada pelo argumento a seguir descrito.
25. Por outro lado, porque, no entender dos CTT, a desconsideração do IQS7 para a aplicação do mecanismo de compensação é imposta pelos princípios da justiça e da juridicidade a que a ANACOM se encontra naturalmente vinculada.
26. Para além do artigo 266.º, n.º 2, da Constituição da República Portuguesa (“**CRP**”), o artigo 8.º do CPA impõe que “*a Administração Pública deve tratar de forma justa todos aqueles que com ela entrem em relação, e rejeitar as soluções manifestamente desrazoáveis ou incompatíveis com a ideia de Direito, nomeadamente em matéria de interpretação das normas jurídicas e das valorações próprias do exercício da função administrativa*” e o artigo 3.º do CPA determina que “*os órgãos da Administração Pública devem atuar em obediência à lei e ao Direito*”.
27. Conforme refere MÁRIO AROSO DE ALMEIDA a este propósito — “*A Administração não se rege, pois, apenas pelas regras ditadas pela lei (e pelas normas regulamentares), mas deve atuar em conformidade com o Direito, isto é, com um conjunto de princípios jurídicos que, para além do que dispõem as regras, se reconduzem à ideia de Direito. Diz-se, neste sentido, que a Administração não está apenas subordinada a parâmetros de legalidade estrita, mas a parâmetros de juridicidade*”².
28. O princípio da justiça, de resto, “*constitui uma última «ratio» da subordinação da Administração ao Direito, permitindo invalidar aqueles actos que, não cabendo em nenhuma das condicionantes jurídicas expressas da actividade administrativa, constituem, no entanto, uma afronta intolerável aos valores elementares da Ordem Jurídica, sobretudo aos plasmados em normas respeitantes à integridade e dignidade das pessoas, à sua boa-fé e confiança no Direito*”³.

² *Teoria Geral do Direito Administrativo*, 5.ª Edição, Almedina, 2019, pág. 87.

³ MÁRIO ESTEVES DE OLIVEIRA, PEDRO COSTA GONÇALVES E J. PACHECO DE AMORIM, *Código do Procedimento Administrativo*, 2.ª edição, 2006, Almedina, p. 106.

29. Ora, parece claro, no entender dos CTT, que a proposta de aplicação de uma penalização aos CTT, em relação a um IQS que foi desconsiderado para aplicação do mecanismo de compensação por uma decisão da ANACOM que já faz parte do acervo jurídico relevante, consubstancia uma solução desrazoável e incompatível com a ideia de *juridicidade* acima referida.
30. É aqui de realçar que a desconsideração do IQS7 para a ativação do mecanismo de compensação não se deu por mera conveniência ou oportunidade administrativa. Pelo contrário, resultou da constatação de que “os valores realizados dependem não apenas dos CTT mas também dos restantes prestadores de serviço nos restantes países”, pelo que é, no entender dos CTT, profundamente injusto continuar a penalizar a empresa por um aspeto que não está na esfera de controlo dos CTT.
31. Acresce ao exposto que a aplicação do mecanismo de compensação corresponde a uma sanção ou penalização para os CTT, pelo que é fundamental, à luz de princípios gerais do nosso ordenamento jurídico, que exista culpa por parte da empresa, ou seja, que o ato seja imputável aos CTT e que exista um juízo de desvalor subjetivo relativamente ao comportamento seguido (que não está alinhado com o padrão exigido).
32. Em termos gerais, existirá culpa quando “*a conduta do agente merecer a reprovação ou censura do direito. E a conduta do lesante é reprovável quando, pela sua capacidade e em face das circunstâncias concretas da situação, se concluir que ele podia e devia ter agido de outro modo*”⁴.
33. De facto, “*afirmar a existência de culpa numa conduta ilícita – seja por violação das prescrições legais estabelecidas, seja por violação das regras de ordem técnica ou de prudência comum que deveriam ter sido adotadas – implica a formulação dum juízo de reprovação por se reputar que o funcionário/agente, naquele circunstancialismo concreto, tinha obrigação de conformar o seu comportamento de modo a não violar aqueles regras e que o não fez*” (Acórdão do TCA Norte de 25.03.2010, proc. 341/05.0BEPNF).
34. Ora, conforme a própria ANACOM admite e já aqui se referiu por diversas vezes, o racional que esteve subjacente à desconsideração do IQS7 para efeito de ativação do mecanismo de

⁴ ANTUNES VARELA, *Das obrigações em geral*. Vol. I. Almedina. 8.º edição. 1994.

compensação foi a circunstância de o seu cumprimento não depender apenas dos CTT, pelo que, em termos muito simples, o eventual incumprimento do objetivo de desempenho não é imputável aos CTT.

35. Se assim é, o eventual incumprimento associado a esse IQS não decorre de uma atuação insuficiente ou indesejável dos CTT, mas antes de um conjunto de fatores externos, incontroláveis, que conduzem a que, independentemente de todos os esforços dos CTT, possa não ser possível cumprir o objetivo de desempenho fixado.
36. Neste sentido, é patente os CTT não têm qualquer *culpa* no incumprimento do objetivo de desempenho associado ao IQS7, pelo que, no seu entender, não podem ser sancionados por factos que não estão na sua esfera de controlo, sendo certo que não existe neste domínio qualquer tipo de responsabilidade objetiva ou pelo risco.
37. Se a ativação do mecanismo de compensação implica valorizar negativamente a atuação dos CTT e, consequentemente, penalizar a margem de atualização dos preços do cabaz de serviços de correspondências, encomendas e correio editorial, é fundamental que tal ativação esteja associada a um desvalor subjetivo da conduta dos CTT, que manifestamente não existe em relação ao IQS7.

2.2. Desconsideração do cumprimento generalizado dos objetivos de desempenho associados à prestação do SPU em 2018

38. Uma última nota para salientar que a aplicação de uma penalização aos CTT se mostra também injustificada pelo facto de os valores objetivo terem sido superados em cerca de 64% dos IQS (cuja importância relativa totaliza 86%).
39. Com efeito, os CTT foram além dos valores objetivos definidos nos IQS1 (demora de encaminhamento no correio normal), 4 (correio normal não entregue até 15 dias úteis), 5 (correio azul não entregue até 10 dias úteis), 6 (demora de encaminhamento de jornais e publicações periódicas), 9 (demora de encaminhamento na encomenda normal), 10 (tempo em fila de espera no atendimento) e 11 (demora de encaminhamento no correio registado). No mesmo sentido, o indicador global de qualidade subiu de 110 para 155, o que corresponde a um aumento de mais de 40%.

40. Resulta claro, por isso, que os CTT tiveram uma performance globalmente muito positiva em 2018. No entanto, o esforço e empenho dos CTT, no sentido de superarem os valores objetivo fixados, não têm qualquer consequência para empresa, quando, como os CTT têm vindo a defender, deveriam servir, por exemplo, para “compensar” uma performance menos positiva em outros IQS.
41. Os CTT não desconhecem que o cumprimento dos objetivos de desempenho é o resultado esperado enquanto prestadores do SPU, mas não podem deixar de referir que o artigo 47.º da Lei Postal determina que o mecanismo de compensação (e, claro, todas as decisões adotadas nesse âmbito) tem de se mostrar compatível com os princípios da proporcionalidade e da adequação.
42. Neste contexto, à luz dos princípios da justiça e da juridicidade atrás referidos, bem como dos princípios de proporcionalidade e adequação previstos no artigo 47.º da Lei Postal, e considerando que 64% dos IQS (com importância relativa de 86%) tiveram um resultado acima dos valores objetivos e que o valor relativo ao IQS2, não obstante ter ficado abaixo do valor mínimo, registou uma melhoria no desempenho, entendem os CTT que não deveria ser ativado o mecanismo de compensação.

3. CONCLUSÃO E PEDIDO

43. À luz do exposto, consideram os CTT que deverão ser reponderados os termos atuais do SPD à luz dos mencionados princípios, considerando os bons resultados integrados (globais, portanto) da qualidade de serviço em 2018.
44. Em especial, mantendo a ANACOM a intenção de que deve ser aplicada uma penalização, a decisão final a adotar no âmbito do corrente procedimento deve desconsiderar, contrariamente ao que faz o SPD, o IQS7 para efeitos de ativação do mecanismo de compensação.
45. Deve, por isso, fixar-se que a variação média ponderada dos preços do cabaz de serviços de correspondências, encomendas e correio editorial não pode ser superior, em 2019, a 1,09% [1,15% - 0,06% (produto da IR do IQS 2 – 6% – com a dedução máxima prevista – 1 p.p.)], e não de 1,065%, conforme previsto no SPD.



Anexo 1

2019



OPERATIONS



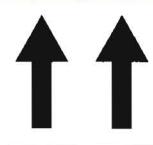
INTERNATIONAL MAIL QUALITY OF SERVICE MONITORING

UNEX™ CEN 2018 results



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INTERNATIONAL PRIORITY LETTER MAIL EXTERNAL QUALITY OF SERVICE MONITORING

UNEX™ CEN module > 2018 results



International letter performance in Europe remains challenged

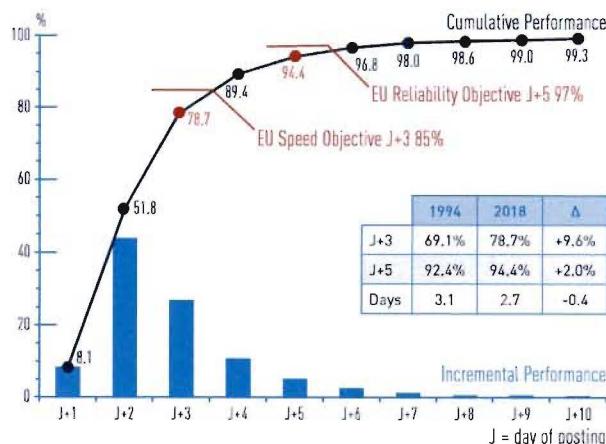
In 2018, the IPC UNEX™ CEN module, which measures international priority letter mail service performance in Europe showed that, on average, 78.7% of letters were delivered within three days of posting and that 94.4% were delivered within five days. The UNEX™ CEN measurement is end-to-end: from posting in the origin country, to delivery to the final addressee in the destination country. This includes the time for collection, sorting and transportation. The UNEX™ measurement solution was put in place by IPC members in 1994 to work together towards top quality cross-border letter mail service.

The 2018 UNEX™ CEN results show that European postal operators continue to experience challenges in maintaining former levels of letter mail performance and in fighting the downward trend. For the third time since 1998, the overall European quality of service results have not reached the objectives set by the 1997 European Union (EU) Directive on Postal Services (97/67/EC Directive), which states that 85% of cross-border letter mail is to be delivered within three days (J+3) and 97% within five days (J+5).

J+1 to J+10 performance

The chart below shows the 2018 postal performance from J+1 to J+10 in Europe (where J for "Jour" is the day of posting).

On the cumulative curve, each point shows the yearly average proportion of international priority mail that was delivered to its final addressee within n days of posting (J+n). Each bar shows the additional proportion of mail delivered compared to the previous day J+(n-1).



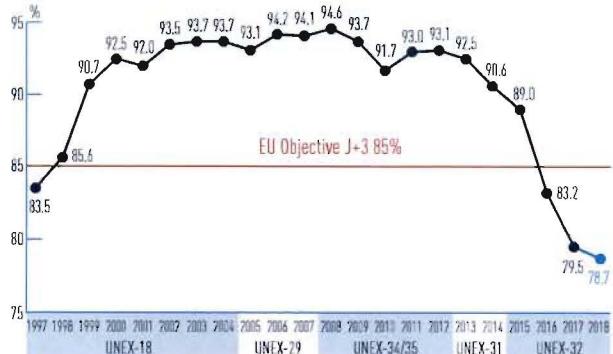
The 2018 curve shows that neither the speed indicator (J+3) nor the reliability indicator (J+5) for European cross-border first-class/priority letter mail delivery times met their respective objectives of 85% (J+3) and 97% (J+5).

However, the curve also shows that half of mail had already been delivered within two working days, and that almost 90% of mail continues to be delivered within four working days.

The average delivery time for the 2018 UNEX™ CEN module was 2.7 days.

J+3 performance across years

The chart below shows the J+3 yearly averages since 1997, when the EU objectives for letter mail service were set, and that European averages have been consistently above the J+3 EU objective of 85% from 1998 to 2015. In 2018, the J+3 speed indicator result was 78.7%, a further decrease of 0.8 percentage point compared to the 2017 result but smaller than in previous years. This shows that since 2015, the downward trend has slowed significantly.



The decreasing trend of quality for cross-border mail since 2013 has various reasons. It is an adverse consequence of the continued pressure on postal resources, processes and infrastructure. This pressure is also translated by the relaxation of domestic standards set in agreement with national regulators (moving from next day delivery to two or three days).

Postal operators have to reduce their working costs related to the declining volume of international letter mail envelopes, while at the same time e-commerce postal letter products such as untracked packets are growing significantly and constantly, creating major challenges in the existing infrastructure.

Postal operators also achieve reduced operational costs by their transportation choice for cross-border mail e.g. converting air transport into road transport where possible or by re-allocating staff to specific parts of the operational postal pipeline.

Performance level across Europe

The table below shows the average performance for the group of 18 countries that have been monitored continuously since 1994, the extended group of 29 countries, and for the 32 countries covered in 2018. The table shows that for all groups, postal performance has remained below the objectives set out by the 1997 EU Postal Directive.

	UNEX-18 ¹	UNEX-29 ²	UNEX-32 ³
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- 1) UNEX-18 covers the 15 EU countries before the May 2004 enlargement: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, the Netherlands, Portugal, Spain, Sweden and the United Kingdom together with Iceland, Norway and Switzerland (the latter as a destination only from 2018 onwards).
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- 3) UNEX-32 covers UNEX-29 extended to Bulgaria and Croatia, i.e. the 2018 EU membership of 28 member states along with Iceland, Norway, Serbia and Switzerland (the latter as a destination only from 2018 onwards).

Performance consistency across Europe

The table below shows the proportion of UNEX™ CEN module country-to-country flows meeting each EU objective. In 2018, only 17.0% of the measured European country-to-country flows have achieved the J+3 EU objective (a decrease of 3 percentage points vs 2017) and 27.5% have achieved the J+5 EU objective (a slight increase of +0.5 percentage points).

	UNEX-18 ¹	UNEX-29 ²	UNEX-32 ³
85% J+3, speed indicator objective	28.3%	17.7%	17.0%
97% J+5, reliability indicator objective	39.4%	28.5%	27.5%
Total number of country-to-country flows	269	708	774

Integrity and independence of results

The validity and independence of the statistics are guaranteed by the UNEX™ CEN module external contractor in charge of the panel, Quotas GmbH (Holstenplatz 20, 22765 Hamburg, Germany – www.quotas.de).

The UNEX™ CEN measurement uses test letters to sample the performance of cross-border mail flows end-to-end, i.e. from posting in the origin country to delivery in the destination country, continuously over the year.

The test letters are posted and received by volunteer panellists selected by Quotas, based on the specified criteria. Both the identity of these panellists and the location of their induction or delivery points are kept unknown from the postal operators participating in the measurement.

Furthermore, the test envelopes mirror the physical characteristics of everyday customer letter mail and are consequently processed anonymously through national and international postal networks. More information on the UNEX™ CEN module and overall methodology can be obtained on the IPC website or by contacting us via unex@ipc.be.

UNEX™ CEN measurement regulatory framework

IPC has applied requirements from the European Committee for Standardization CEN standard EN13850 Postal services – Quality of service – Measurement of the transit time of end-to-end services for single-piece priority and first-class mail, on top of its own grid of European country-to-country flows. For the 2016 study, IPC has been audited to verify that the UNEX™ system meets all methodology requirements specified in the latest update of this CEN standard, EN13850:2012, which was released in 2012.

As communicated in past publications, IPC requested PwC* Bedrijfsrevisoren/Reviseurs d'Entreprises ("PwC" in what follows) in Belgium to perform an independent reasonable assurance engagement in accordance with the ISAE 3000 standard to assess the compliance of IPC's UNEX™ quality measurement processes with the CEN EN13850:2012 standard ("standard" in what follows).

PwC noted that the UNEX™ CEN module was compliant, in all material respects, with this standard, except for three areas where, in IPC's opinion, the most relevant in respect of the figures presented in this brochure is related to the real mail data provided. Indeed, the real mail data provided by several postal operators to set up the statistical design for geographical and mail characteristics included domestic data or sometimes bulk mail data and not only cross-border Single Piece Priority Mail (SPPM) related data as prescribed in the standard.

PwC concluded that, in their opinion, except for the effects of the two other non-compliance matters described in the Basis for Qualified Opinion Paragraph of their full report and except for the possible effects of the matter described above in respect of the real mail data, IPC's UNEX™ CEN measurement processes were compliant, in all material respects, with the standard and the country-to-Europe as well as the Europe-to-country figures (Percentage On Time in J+3, J+5 & Average Delivery Days) are fairly stated, in all material respects. This audit was performed on the study period from 1 January 2016 to 31 December 2016. As per the standard requirements, a new audit will be done on the UNEX™ CEN measurement activities in 2019.

* PwC has performed the abovementioned engagement and report solely for use by the IPC under a contract agreed upon with IPC. PwC does not have any obligation towards any other person; PwC does not have nor accept any liability or responsibility (contractual, extra-contractual or otherwise) towards such other person. The full report is available to the European participating postal operators as well as their regulators upon request via unex@ipc.be.

Europe > Percentage On Time in J+3 & J+5 and Average Delivery Days

IPC publishes the UNEX™ CEN module end-to-end results for international priority letter mail in Europe annually

Key performance indicators: the three indicators presented in this brochure are the percentage of test mail items delivered within three days (J+3) i.e. the speed indicator, within five days (J+5) i.e. the reliability indicator, and the average number of delivery days taken to deliver mail. J ("Jour") is the day of posting and so, for example, +3 expresses the number of days before final delivery to the addressee during which time collection, sorting, national and international transport, and delivery has taken place. The distribution of the cumulative results from J+1 to J+10 as well as statistical precision figures are available for the 774 country-to-country flows upon request via unex@ipc.be.

Method of calculation: the results are calculated based on the posting date, for items sent between 1 January and 31 December 2018, and on a five- or six-day business week, depending on the actual days of collection, delivery and processing operations of each postal operator. National and regional postal holidays are excluded in the destination country as well as holidays in the origin country if they directly follow the day on which the test letters were sent. Lists of non-working days (national and regional postal holidays or weekdays during which postal operations such as collection, delivery and processing do not take place) as well as a detailed description of the results' calculation methodology are available upon request via unex@ipc.be.

UNEX™ CEN module > 2018 results

Origin Country	Destination Country [ISO alpha-2 code]																																
	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	GR	HU	IS	IE	IT	LV	LT	LU	MT	NL	NO	PL	PT	RO	RS	SK	SI	ES	SE	CH	GB	
Austria (AT)	J+3	70.0	58.0	91.9	37.5	87.5	79.7	75.6	82.9	87.5	99.8	50.0	91.5	6.1	68.4	66.7	59.4	69.3	85.2	78.0	78.6	27.9	63.0	60.5	74.7	61.7	92.6	95.0	81.1	81.6	98.0	94.4	
	J+5	95.0	82.4	98.9	75.0	97.7	75.7	96.3	94.3	97.5	98.0	88.8	97.6	63.5	94.7	91.1	87.9	90.7	98.8	95.1	95.2	85.7	93.3	94.7	87.0	89.4	91.3	99.5	100.8	94.7	100.0	97.2	
	Days	3.3	3.8	2.3	5.3	2.4	4.4	2.9	2.7	2.5	2.3	3.0	2.7	5.7	3.3	2.9	3.3	3.2	2.5	2.6	3.0	4.3	3.3	3.1	3.3	3.4	2.2	2.1	2.7	2.7	2.0	2.2	
Belgium (BE)	J+3	87.9	22.9	76.5	20.0	75.6	43.2	63.8	55.0	78.5	84.5	65.9	51.2	3.1	84.4	74.5	40.0	46.7	90.9	51.4	90.6	12.1	57.1	64.1	55.0	37.8	90.6	73.2	50.8	46.7	71.8	82.7	
	J+5	100.0	54.2	90.6	45.0	95.1	78.4	87.2	80.0	92.3	95.8	94.1	83.3	40.6	97.4	87.2	60.0	90.0	97.5	81.1	96.6	45.5	77.0	84.6	87.5	67.6	96.9	87.8	84.7	89.7	97.4	97.5	
	Days	2.6	5.9	3.3	4.8	2.7	4.3	3.5	4.4	2.8	2.5	3.8	4.1	5.8	2.7	3.2	3.5	4.0	7.3	3.9	2.4	6.3	3.7	3.8	3.7	5.6	2.7	3.8	3.4	2.9	7.5		
Bulgaria (BG)	J+3	26.1	13.0		35.3	59.3	6.7	11.6	3.4	71.7	25.4	0.0	9.1		12.5	21.7	19.2	11.1	7.7	31.1	4.8	9.1	13.0	72.2	0.0	70.7	23.3	30.0	12.0	17.1			
	J+5	82.8	52.2		58.8	78.6	13.3	68.2	51.7	10.5	54.2	29.8	45.5		37.5	51.7	43.5	53.8	38.9	30.8	73.9	14.3	47.8	46.7	27.8	37.9	56.7	70.0	56.0	52.4			
	Days	4.3	6.5		6.2	4.3	8.5	5.6	6.6	6.4	6.2	7.5	7.0		7.3	6.1	6.4	6.2	7.4	7.9	4.8	8.9	6.6	6.3	6.5	8.8	6.6	5.9	6.0	6.0			
Croatia (HR)	J+3	87.0	41.7			44.2			45.0	84.0		31.4		40.9	59.0					91.1	0.0	34.3			60.5	88.6	91.7	45.9	78.6	87.5	54.8		
	J+5	97.4	88.9			97.4			92.5	97.4		81.8		86.4	82.1					100.0	67.9	77.1			84.2	100.0	91.5	70.3	100.0	96.8	92.9		
	Days	2.5	3.9			3.6			3.4	2.7		4.7		3.8	3.9					2.6	5.5	4.5			3.7	7.5	2.3	4.5	2.9	7.8	3.7		
Cyprus (CY)	J+3	36.0	21.4	21.1		23.1			5.0	36.4	19.3	44.9		16.7	42.9					11.0	14.3	4.5			30.8			79.4	25.0	47.4	45.1		
	J+5	73.7	60.7	73.7		67.7			65.0	68.2	71.1	78.6		55.6	78.6					61.7	47.6	18.2			65.4			70.6	49.0	63.2	80.0		
	Days	4.1	5.1	5.1		5.4			5.6	5.0	5.2	4.1		5.5	4.1					5.6	6.4	8.1			4.7			4.6	5.2	4.6	4.1		
Czech Republic (CZ)	J+3	86.7	75.0	15.6	35.1	10.0		14.7	22.3	55.9	65.5	70.7	30.0	43.2	35.9	48.1	35.4	19.4	38.5	31.1	43.3	3.6	47.1	54.1	22.2	21.7	94.0	59.5	50.0	70.3	87.5	42.2	
	J+5	97.8	97.5	48.8	81.1	45.0		55.9	76.3	91.2	98.2	97.6	77.5	73.0	92.3	84.4	85.8	83.3	84.6	86.7	87.8	44.4	82.4	94.4	88.6	71.9	91.5	97.6	88.9	97.3	100.0	85.8	
	Days	2.5	3.1	5.1	4.6	5.6		5.0	4.9	3.7	3.3	2.8	4.6	4.5	4.2	3.9	4.1	4.6	4.2	4.7	3.8	6.0	4.7	3.5	4.7	4.9	7.1	3.2	3.7	3.1	2.5	4.1	
Denmark (DK)	J+3	88.9	78.0	20.0	76.2	20.7	73.8		84.8	97.4	87.2	88.1	67.6	72.0	29.6	87.2	88.4	84.4	85.3	47.5	44.2	87.5	74.4	78.0	81.6	41.5	43.6	91.7	53.8	83.8	96.1	94.8	92.6
	J+5	97.2	95.1	73.3	97.6	79.3	100.0		100.0	100.0	97.4	94.4	91.9	97.3	91.0	97.4	97.7	93.8	97.1	92.5	83.7	100.0	98.5	92.7	94.7	87.8	89.7	100.0	92.3	100.0	100.0	98.1	
	Days	2.4	3.0	5.0	2.8	4.7	2.7		2.5	2.0	2.6	2.3	3.1	2.8	3.8	2.7	2.6	3.1	2.7	3.9	4.2	2.5	3.2	3.1	2.9	4.0	3.8	2.3	3.7	2.6	2.1	1.9	2.1

UNEX™ CEN module > 2018 results

Origin Country	Destination Country [ISO alpha-2 code]																																
	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	GR	HU	IS	IE	IT	LV	LT	LU	MT	NL	NO	PL	PT	RO	RS	SK	SI	ES	SE	CH	GB	
Estonia (EE)	J+3 66.7	54.3		44.7		34.3	27.8		44.5	17.9	50.7	13.3	32.4		35.3	31.6	68.8	55.3		52.9	27.5	29.6		34.4		57.6	42.9	25.7	41.8	55.3	31.3		
	J+5 94.3	91.4		84.7		82.9	75.0		91.0	75.0	87.0	80.0	76.5		82.4	92.1	93.0	92.1		88.7	64.7	81.5		81.8		92.9	76.0	74.3	92.7	94.7	79.3		
	Days 3.2	3.6		4.3		4.3	4.6		3.3	4.6	3.9	5.7	4.3		4.3	4.2	3.1	3.8		3.6	4.9	4.8		4.2		3.3	4.3	4.9	3.4	3.5	4.4		
Finland (FI)	J+3 90.7	64.9	36.7	60.5	30.8	71.5	39.5	86.6	61.9	70.9	17.1	57.9	40.5	65.1	64.3	100.0	87.2	61.0	48.7	76.7	63.0	70.5	70.5	57.1		94.9	57.8	33.5	91.8	78.9	77.9		
	J+5 97.7	89.2	62.3	94.7	84.6	97.4	76.3	92.3	95.2	90.7	97.4	85.3	97.7	92.9	100.0	97.4	92.7	79.5	97.3	93.5	90.8	93.2	88.6		100.0	88.9	84.0	98.3	97.4	98.5			
	Days 2.3	3.4	4.7	3.4	4.5	2.6	4.1	2.4	3.3	3.3	4.0	3.4	4.1	3.1	2.5	2.0	2.0	3.5	4.2	3.1	3.4	3.3	3.3	3.3	2.2	3.3	3.8	2.2	2.7	2.6			
France (FRA)	J+3 92.1	86.7	72.0	77.4	41.7	76.3	79.8	54.1	89.2		87.5	54.2	67.8	42.4	90.0	88.6	84.4	75.0	85.0	41.5	89.0	10.9	88.5	83.2	57.1	56.1	84.8	85.0	77.7	99.7	94.4	88.4	
	J+5 98.9	96.1	68.1	93.5	46.7	94.8	61.7	91.9	94.6		96.4	82.5	91.9	91.5	95.0	96.1	90.6	72.5	98.9	94.9	94.2	73.0	96.1	98.3	97.6	81.8	91.0	93.3	95.5	100.0	98.6	97.3	
	Days 2.2	2.6	5.1	3.0	4.7	2.9	4.7	3.5	2.5		2.7	4.0	3.2	3.9	2.7	2.6	2.1	4.8	2.3	3.6	2.6	5.2	2.8	2.5	3.4	3.9	2.7	3.1	2.7	2.4	2.6		
Germany (DE)	J+3 84.8																									73.3							
	J+5 97.1																									92.0							
	Days 2.5																									3.1							
Greece (GR)	J+3 85.7	93.7	9.4	40.0	62.5	77.6	23.7	55.6	35.1	81.3	79.1	47.5		55.8	78.7	39.4	73.8	38.1	59.4	12.2	67.0	38.1	71.4	46.7		50.0	72.2	90.2	74.0		74.0		
	J+5 92.9	97.7	62.5	100.0	88.8	97.2	60.4	77.8	76.7	92.3	96.6	92.5		83.7	95.7	81.8	97.6	76.6	93.8	87.8	85.7	71.4	88.6	90.0		93.2	94.4	100.0	90.6		90.6		
	Days 2.9	2.8	5.5	3.3	3.5	2.9	5.0	4.3	4.7	2.8	2.8	3.4		4.1	2.9	4.7	2.8	4.5	3.0	4.6	3.7	4.7	3.1	3.7		3.7	2.7	2.3	3.8				
Hungary (HUN)	J+3 93.0	71.8	62.5	85.7	76.1	81.1	47.5	79.4	89.2	60.8	86.9	28.1		39.4	53.3	54.5	55.2	89.6	61.0	85.0	7.1	67.5	72.2	71.8	37.5	47.5	92.7	50.0	92.4	92.9	78.5		
	J+5 98.2	97.4	87.5	94.3	82.7	100.0	72.5	91.2	97.3	86.1	95.0	51.4		78.8	88.9	84.8	82.8	93.5	92.7	93.0	46.4	87.5	91.7	98.1	83.3	95.0	97.6	86.8	97.1	95.2	96.3		
	Days 2.1	3.3	3.5	2.9	6.3	2.7	4.7	3.5	2.4	3.8	2.6	5.1		4.8	4.2	4.1	4.1	3.1	3.8	2.9	6.1	3.5	3.4	3.1	4.0	2.5	2.2	4.0	2.7	2.3	2.9		
Iceland (IS)	J+3 58.1	19.4					42.4		77.1	72.2	45.2				32.0	3.8					31.0	72.2	42.3	20.7				21.9	82.1	36.2	79.7		
	J+5 90.3	80.5					66.1		97.1	96.9	94.8				72.0	53.8					66.2	87.0	75.9					68.8	98.2	89.7	98.4		
	Days 3.5	4.6					4.7		2.8	3.7	3.4				4.6	5.4					4.8	4.8	5.0					5.0	2.6	4.0	2.7		
Ireland (IE)	J+3 82.9	72.1	27.0	28.6	15.4	73.0	12.8	40.5	44.2	86.7	90.4	64.1	52.7	44.4	83.3	57.0	54.8	57.9	71.8	70.0	28.2	31.7	92.5	54.8		61.5	58.5	79.5	82.1	90.0	95.9		
	J+5 14.3	97.7	75.0	88.0	61.5	89.2	71.8	91.4	87.2	85.3	98.2	87.2	82.9	94.4	90.5	93.9	92.3	89.7	97.6	84.6	88.5	108.8	85.7		97.3	82.9	94.9	97.6	97.5	95.9			
	Days 2.7	3.0	6.6	4.4	5.5	3.6	4.9	3.7	3.8	2.6	2.7	3.7	3.7	2.9	3.7	3.7	3.7	3.5	2.9	4.3	4.5	2.5	3.7		2.7	3.8	7.9	2.6	2.4	2.1			
Italy (IT)	J+3 77.9	56.1	14.6	59.4	15.4	41.3	35.9	38.5	44.2	66.8	73.6	50.0	35.9	5.9	69.0	65.6	23.5	69.5	41.5	34.7	2.5	22.2	65.8	79.7	20.6	54.8	77.4	40.7	56.8	68.8	53.4		
	J+5 93.5	80.5	58.5	92.8	61.5	69.6	69.2	87.2	79.1	80.6	86.8	88.8	82.1	50.0	88.4	87.5	78.5	84.2	80.5	83.7	78.9	64.4	78.9	62.2	58.8	81.0	93.5	78.0	83.8	87.2	79.5		
	Days 2.9	4.3	5.4	3.7	5.6	4.0	4.9	4.4	4.0	3.4	3.3	4.4	4.8	5.8	3.6	3.5	5.0	3.8	4.4	4.5	5.1	5.7	4.2	5.6	5.6	4.1	3.0	4.6	3.8	3.3	4.5		
Latvia (LVL)	J+3 85.8	82.9		45.7	19.0	80.0	48.4	97.7	89.2	84.2	56.0	47.2	27.5		41.5	63.4		90.2	62.2	83.3	64.7	67.6	61.8	37.8		92.3	82.4	51.5	90.2	97.3		82.7	
	J+5 100.0	97.1		100.0	51.9	97.1	87.1	100.0	97.3	92.1	94.0	75.0	72.5		85.4	92.7		98.9	94.6	100.0	97.2	91.9	88.2	75.7		100.0	97.1	87.9	100.0	100.0	97.3		
	Days 2.5	2.8		3.7	5.3	2.6	3.8	2.0	2.2	2.7	3.5	4.6	4.6		4.1	3.2		2.4	3.4	2.7	3.3	3.7	3.5	4.6		2.1	2.9	4.0	2.2	2.1	2.7		
Lithuania (LT)	J+3 84.4	66.7	10.3	71.4		42.5	22.7	82.7	44.6	38.0		46.2		1.0	68.3	93.3			62.5	91.7	24.0	50.0	70.0			88.6		61.6	82.0	69.2	55.6		
	J+5 100.0	91.7	44.8	67.9		45.0	95.1	90.2	94.6	93.9		92.3		43.3	90.2	98.3			87.5	100.0	82.0	89.7	97.3			100.0		97.1	100.0	97.4	92.9		
	Days 2.6	3.4	6.3		5.0		4.4	2.3	3.0	2.9	3.8		4.0		5.9	3.7	2.3			3.8	2.3	4.5	3.9	3.2			2.6	3.3	2.7	3.3	3.8		
Luxembourg (LUX)	J+3 85.7	92.4	32.4		13.0	43.4	50.0		45.8	87.7	92.7	50.0	35.3	9.7	71.8	89.7	78.1	61.9		71.4	91.7	26.3	50.0	72.2	50.0		71.0	71.1	58.5	87.5	92.3	89.7	
	J+5 92.6	98.1	61.8		45.2	92.7	87.5		97.4	95.6	98.7	83.3	78.5	64.5	97.4	100.0	96.9	88.1		97.6	100.0	76.3	97.5	97.6			95.2	92.1	92.7	100.0	100.0	100.0	
	Days 2.5	2.2	5.1		4.8	2.9	3.8		3.1	2.4	2.1	3.9	4.6	5.5	2.9	2.2	2.7	3.5		3.0	2.4	4.8	3.4	2.8	3.4		3.0	3.8	3.2	2.3	2.7	2.8	

UNEX™ CEN module > 2018 results

Origin Country	Destination Country [ISO alpha-2 code]																																		
	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	GR	HU	IS	IE	IT	LY	LT	LU	MT	NL	NO	PL	PT	RO	RS	SK	SI	ES	SE	CH	GB			
Malta (MT)	J+3																													62.2					
	J+5																													89.2					
	Days																													3.4					
Netherlands (NL)	J+3	73.2	92.4	55.6	24.1	16.0	30.0	25.4	44.9	66.7	89.5	76.3	48.4	57.7	10.6	68.9	22.0	69.2	55.6	93.3	20.9	7.0	42.5	70.9	60.5	18.3	38.8	41.3	57.9	80.9	87.2	86.9			
	J+5	96.7	97.5	84.0	82.4	40.0	91.3	65.1	93.7	91.7	97.7	100.0	88.0	92.0	52.1	95.6	55.1	92.3	79.4	100.0	67.4	75.4	88.3	94.8	86.8	73.1	86.8	91.3	93.0	94.0	100.0	97.6			
	Days	3.3	2.4	4.3	4.5	6.5	4.1	4.9	3.9	3.3	2.3	2.9	4.1	3.3	5.9	3.1	6.8	3.3	4.0	2.0	4.7	4.9	4.0	3.1	3.7	5.3	4.3	3.9	3.5	2.7	3.0	2.4			
Norway (NO)	J+3	52.4	43.2	11.8	17.2	12.0	40.5	20.4	43.2	38.2	52.1	37.3	5.1	18.2	5.9	40.0	22.7	56.3	14.6	17.1	58.1		14.0	15.4	19.4	31.6	11.4	22.5	66.1	68.4	67.5				
	J+5	88.1	91.9	67.6	79.5	64.0	97.3	47.6	91.9	85.3	95.8	86.5	79.5	49.7	79.4	95.6	77.3	84.4	91.7	82.9	95.3		76.7	94.3	86.1	94.7	57.1	85.0	97.1	97.1	91.3				
	Days	4.0	4.0	5.4	5.1	5.2	3.0	5.4	3.8	4.5	3.7	4.3	4.8	4.9	4.9	4.0	4.7	3.9	4.3	4.5	3.7	5.2	4.4	4.4	3.9	5.6	4.4	3.4	3.5	3.3					
Poland (PL)	J+3	87.5	63.4	29.4	60.0	10.0	81.3	31.6	71.1	39.5	75.0	81.1	35.0	57.9	2.9	46.5	67.4	49.2	74.6	72.5	34.2	74.0	7.9	46.7	53.5	23.3	80.4	47.7	51.3	74.4	78.9	86.3			
	J+5	97.5	92.7	61.8	93.3	30.0	100.0	60.5	91.1	86.8	94.1	97.3	75.0	84.8	45.7	86.0	90.7	92.3	96.7	97.5	81.6	91.0	47.4	88.9	83.7	56.7	97.8	77.3	89.7	100.0	100.0	99.3			
	Days	2.5	3.3	5.6	3.4	7.3	2.7	4.9	3.2	4.2	3.4	2.9	4.5	3.6	6.9	4.0	3.8	3.2	3.0	3.1	4.3	3.3	6.8	3.9	3.9	5.6	2.0	4.4	4.3	2.7	2.7	2.0			
Portugal (PT)	J+3	94.4	73.7	38.7	40.5	21.1	71.4	40.5	45.5	66.7	79.4	84.1	44.7	48.7		73.0	78.8	60.0	58.3	77.0	54.0	80.5	5.9	39.5	51.5		81.1	64.7	83.6	90.3	87.5	93.7			
	J+5	100.0	92.1	77.4	74.6	57.9	100.0	78.6	78.8	92.9	97.1	97.1	81.6	84.6		91.9	97.0	66.7	94.4	97.2	81.9	100.0	52.9	45.8	81.8		97.3	91.2	98.0	97.0	95.8	98.3			
	Days	2.0	3.1	4.7	3.8	5.5	3.0	4.3	4.7	3.4	3.1	2.7	4.2	4.0		3.6	7.6	3.6	3.5	2.0	3.0	2.7	5.8	5.1		4.1		2.6	3.4	2.5	2.2	2.4	2.2		
Romania (RO)	J+3																												40.0						
	J+5																												80.0						
	Days																												4.1						
Serbia (Republic of) (RS)	J+3	90.4	55.2	41.7	11.5	26.8	79.2	14.3		49.4	6.5	50.0	32.1									61.5	12.7	17.9			92.6	34.5	66.7	39.4	45.7				
	J+5	98.1	93.7	79.2	100.0	78.9	95.8	44.4		84.4	14.0	92.3	75.0									91.3	54.8	40.7			98.1	72.4	97.2	78.8	79.1				
	Days	2.2	3.4	4.5	2.2	4.6	2.8	5.9		3.9	8.4	3.7	4.6									3.5	5.5	5.6			2.1	4.5	2.9	4.9	4.0				
Slovak Republic (SK)	J+3	88.9	67.5	43.8	80.9	36.0	97.7	36.4	39.5	57.5	51.4	81.7		70.7		58.0	65.0	66.7	57.9			61.4	8.6	41.9	38.6	75.0	65.5	93.8	57.8	81.0	62.5	72.8			
	J+5	98.4	97.5	98.6	98.5	98.6	96.0	99.1	83.6	65.6	97.5	98.9	95.2	95.1		95.0	90.0	90.9	94.7			93.7	80.0	81.4	86.1	94.9	96.6	100.0	91.1	95.2	92.5	94.4			
	Days	2.7	3.2	4.0	2.7	4.0	2.2	4.8	4.7	3.4	3.6	2.9				3.5	3.8	3.3	3.3			3.3	5.4	4.5	4.4	3.1	3.1	2.4	3.9	2.6	3.7	3.1			
Slovenia (SI)	J+3	94.0	84.2	24.3	96.1		98.7	41.0	65.0	35.5	49.9	89.5	51.2	57.1		54.8	87.4	81.6		79.5		63.2	23.1	35.7	81.6	63.4	72.7	95.1	73.2	75.0	97.7	67.4			
	J+5	100.0	100.0	81.1	98.5		97.7	66.7	85.7	88.6	94.2	97.7	98.2	90.5		76.2	95.3	98.8	72.3			84.2	79.5	54.8	100.0	98.7	93.9	100.0	97.6	97.2	100.0	93.5			
	Days	2.1	7.6	4.7	7.1		2.5	4.4	3.7	4.3	3.1	2.3	3.9	3.5		4.8	2.6	3.1				3.2		3.8	4.5	6.5	2.7	3.8	3.3	2.0		3.0	3.0	2.2	3.3
Spain (ES)	J+3	85.7	87.5	32.6	20.5	20.0	51.4	38.9	43.3	47.4	76.7	75.2	49.2	41.2	17.9	79.4	80.7	59.4	59.0	40.5	34.2	81.8	7.7	18.4	89.8	51.2	25.0	11.1	75.8		88.9	93.0	89.3		
	J+5	97.1	92.5	69.8	71.8	51.0	97.1	72.2	93.3	92.0	95.5	96.9	83.3	88.2	53.6	100.0	95.0	84.4	84.3	89.5	76.3	92.1	33.3	65.8	98.4	88.5	54.2	94.7	92.0		97.2	97.7	98.2		
	Days	2.4	2.9	4.7	5.3	5.3	3.2	4.2	3.6	2.4	3.1	2.5	2.8	4.0	6.8	2.8	2.8	3.7	3.5	3.5	4.5	2.8	4.3	5.3	2.4	3.9	5.4	2.9	2.9		2.3	2.2	2.4		
Sweden (SE)	J+3	92.5	71.8	28.8	37.0	29.2	86.1	51.1	88.8	81.7	75.6	87.6	58.3	74.4	37.3	80.7	83.3	90.2	78.8	51.4	27.0	81.7	81.8	71.7	66.7	48.5	36.8	80.4	60.0	65.8	87.8	92.4			
	J+5	97.5	92.3	74.2	80.5	83.3	97.2	82.1	100.0	97.2	92.7	97.6	86.1	97.4	97.3	97.2	92.9	95.1	97.8	94.3	67.6	97.6	99.5	87.0	97.2	75.8	75.0	100.0	91.4	97.4	95.1	98.5			
	Days	2.3	3.1	4.6	4.1	4.4	2.5	3.7	2.3	2.5	3.1	2.5	3.8	3.8	3.8	2.6	2.8	2.6	3.1	3.6	5.0	2.6	3.1	3.1	4.5	4.9	2.0	3.7	3.4		2.4	2.3	2.3		
United Kingdom (GB)	J+3	97.0	98.6	39.5	68.0	42.1	93.3	54.5	49.5	91.1	85.6	88.0	71.1	76.8	31.1	90.6	84.2	84.4	39.2	75.6	77.0	83.0	37.8	72.2	69.5	67.7	56.8	79.3	29.2	78.7	91.8	93.8			
	J+5	98.7	98.3	76.5	89.8	81.1	98.3	77.9	83.5	99.5	98.8	98.3	94.4	95.0	89.5	98.5	96.5	98.5	97.6	96.8	98.1	81.4	91.3	89.1	88.4	88.5	97.3	99.0		100.0					
	Days	2.3	2.5	4.6	3.8	4.3	2.7	3.9	4.1	2.5	2.7	2.7	3.3	3.1	4.1	2.5	2.7	2.8	4.8	3.1	3.8	2.8	4.2	2.4	2.4	3.7	1.8	4.2	2.8	1.4	2.3				

Statistical design

The UNEX™ CEN measurement covered by this publication is carried out continuously throughout the year and monitors both urban and rural areas in Europe in line with the real mail geographical spread of single-piece priority letter mail (sent or received).

The characteristics of the test letters and the panel are specified to ensure that they are representative of the real mail stream with respect to size and weight (C6-20g, C5-50g, C4-50g), posting methods (mailbox, post office, pick-up), payment methods (stamp, meter, PP), addressing (machine typed, handwritten), envelope lay-out and geographical coverage in terms of posting and delivery locations for mail in each country.

The UNEX™ CEN module and in particular, the *European Committee for Standardization CEN standard EN13850:2012 Postal services – Quality of service – Measurement of the transit time of end-to-end services for single-piece priority and first class mail* which remains the main driver, require the design i.e. test mail samples, physical characteristics of that mail, panellists profiles as well as origin and destination country spread, to be based on real mail studies that should be carried out by each post serving as the universal postal service provider in a CEN country.

The reported UNEX™ CEN module results cover international priority letter mail single-piece, i.e. mail which is not bulk mail or that would imply constraints for the customers at posting, e.g. the registration of items, minimum induction volumes, equal contents or the pre-sortation of the inducted mail, in line with the CEN standard EN13850:2012 scope.

The study covers the cross-border mail processes between countries in Europe, so given the regulatory situation in some countries, it might be possible that some part of the mail (hence also of the UNEX™ test mail) is handled by another postal operator than the universal service providers in the countries involved.

The country-to-country results published in this report are calculated for information as a detailed sub-result of the country-to-Europe and Europe-to-country statistical design. Since 2016, the field of study for the UNEX™ CEN measurement has been "country-to-Europe" and "Europe-to-country": the mail characteristics and geographical constraints mix has been applied at country-to-Europe and Europe-to-country level, rather than forcing it on each individual country-to-country flow whatever the flow's size is. This modification has been part of the audit conclusion by PwC (see page 3).



For the UNEX™ CEN module 2018:

- Test letter volumes to be sent from each country to the rest of Europe and vice versa were calculated based on the procedure described in the CEN EN13850:2012 standard, using the international priority single-piece real mail volumes travelling from each country to Europe and vice versa. Real mail data is provided by both posts on each international flow based on the accounting agreements they exchange annually to calculate each other's remuneration in delivering each other's international mail ("terminal dues"). Once total test letter volumes outbound and inbound have been calculated for each country, they are allocated to specific country-to-country flows using relative real mail proportions to ensure correct representation of real mail flows in Europe.
- Very small country-to-country flows were not measured; the CEN EN13850:2012 standard specifies that flows with real mail volumes below 11,500 mail pieces per year may be excluded from the measurement. Indeed, if the test mail itself was inducted on such flows, they would artificially increase the real mail volume by more than 2.5%.
- The geographical spread of the test mail in origin or destination countries was mainly based on real mail statistics aggregating all mail processed i.e. often a mix of domestic and international mail. The mail characteristics sampling related to induction and payment methods, sizes and weights was in some instances based on all mail processed by the postal operator within the country. Indeed, not all operators can split their mail statistics into national and international flow for each of these parameters.
- The letter mail sizes measured were C6, C5 and C4, and the weights were 20g and 50g. Test letters were no thicker than a few millimetres.
- The results reported above meet the post-factum redress procedure requested by the CEN standard EN 13850:2012. To handle possible deviations between the final test volume, sample proportions achieved and the initially required real mail statistics proportions, a complex process of weighting is to be applied. As required by the CEN Standard, IPC first analyses the variation in past postal performance to identify the key discriminant factors for each of the measured flows. Where deviations from the statistical design proportions were found on the discriminant factors, IPC has adjusted by implementing a corrective multivariate weighting on each of the factors for each of the country-to-Europe and Europe-to-country flows.
- After the corrective weighting on each of the country-to-Europe and Europe-to-country flows, IPC has calculated the weighted European average. More information on the discriminant analyses or on the corrective weighting process can be obtained via unex@ipc.be.
- The ex post weighting above also applies to statistical accuracy. For the 2018 results, the precision range of one third of the country outbound and country inbound total results was below or equal to 5% (assuming a 95% level of confidence).

For the UNEX™ CEN module 2018 (continued):

> Deutsche Post DHL Group (from 2013) and Swiss Post (from 2018) have decided to no longer participate in the UNEX™ CEN measurement. MaltaPost and Posta Româna did not participate in 2018 but will rejoin the study as of 2019. Therefore, any flow measured from Germany, Malta, Romania or Switzerland and reported in the UNEX™ CEN module is the result of the individual choice of universal postal service providers in other countries to measure that country as an origin. In the other direction, all participating posts measure their flows towards these four countries by default (when enough real mail volume exists).

The CEN EN13850:2012 standard's methodology for international postal measurement is not applicable in a multi-postal operator market situation which is the case in Germany. This remains an exception in Europe as there is no single post serving as universal service provider in that country.

> As described in previous editions, postal operations in Denmark and Italy went through a severe process reorganisation during 2016.

In Denmark, collection processes from street mail boxes have been amended; after a postal law that was put into practice on 1 July 2016, priority treatment to international mail is only to be given to letters posted in post offices or picked up from businesses.

Consequently, mail box induction stopped being measured in the UNEX™ CEN module in Denmark, which was approved during the above-mentioned audit process.

In selected areas of Italy, Poste Italiane started implementing a process based on alternating collection and delivery days, rotating postal collection and delivery processes every other week. The selection of these localities was based on various criteria such as a low population and/or low real mail volumes and was agreed upon by the Italian postal regulator.

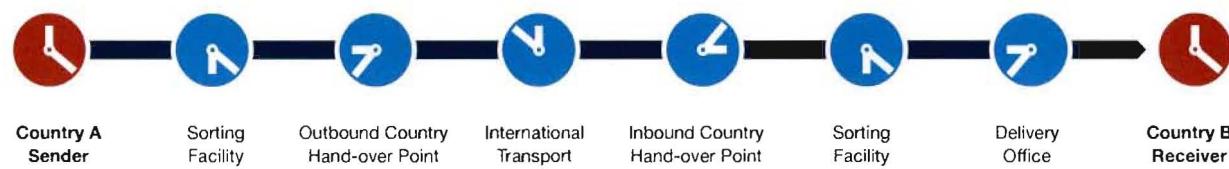
Regarding mail collection, the Italian regulator has adjusted domestic standards specifically for mail posted in the street mail boxes of these areas. On the delivery side, the rotating pattern means that one part of a small town has their mail delivered on Monday, Wednesday and Friday in one week and on Tuesday and Thursday in the following week, while the other part of the same area has the reverse schedule.

The new process has been implemented by Poste Italiane in waves from 2016 to 2018 and areas affected stopped being part of the UNEX™ CEN measurement from the moment the change was applied in each area. This process was also part of the audit conclusion by PwC.

Radio Frequency Identification (RFID) technology

In 2018, about 45% of UNEX™ CEN module test letters contained a Radio Frequency Identification (RFID) device. As the test letter moves through the international mail pipeline, the time of its arrival at specific points can be recorded automatically by radio receivers located in postal facilities. These radio receivers are linked to a global RFID network run by IPC. In a fully anonymous manner, the RFID tags help

to identify any delays which may occur along the postal process, from origin country to destination country. This RFID technology, with continuous technical enhancements, has been in use for the UNEX™ postal quality of service measurement for more than 20 years. Currently this network serves 35 postal operators and covers close to 300 postal facilities with 2,730 reading points.



About International Post Corporation

International Post Corporation (IPC) is the leading service provider of the global postal industry that provides leadership by driving service quality, interoperability and business-critical intelligence to support posts in defending existing business and expanding into new growth areas. It is a cooperative association of 23 member postal operators in Asia Pacific, Europe and North America. IPC's 36 services and more than 50 applications are used by over 180 posts worldwide. Since 1989 IPC has set standards for upgrading quality and

service performance and developed technological solutions that help members enhance service for international letters, packets and parcels. IPC engages in industry research, creates business-critical intelligence, provides a range of platforms and programmes for member post CEOs and senior management to exchange best practices and discuss strategy. IPC also manages the system for incentive-based payments between postal operators. For more information please visit our website at www.ipc.be.

UNEX™ CEN module countries in 2018

Participating postal operators

Website address

Austria	Österreichische Post AG	www.post.at
Belgium	bpost	www.bpost.be
Cyprus	Cyprus Post	www.mcw.gov.cy
Denmark	PostNord Danmark	www.postdanmark.dk
Finland	Posti	www.posti.com
France	Le Groupe La Poste	www.laposte.fr
Germany	<i>As explained above, although Deutsche Post DHL Group itself was not participating in the study, test mail was sent from and to Germany on behalf of other postal operators.</i>	
Greece	Hellenic Post ELTA	www.elta.gr
Hungary	Magyar Posta	www.posta.hu
Iceland	Iceland Post	www.postur.is
Ireland	An Post	www.anpost.ie
Italy	Poste Italiane S.p.A.	www.poste.it
Luxembourg	POST Luxembourg	www.post.lu
Norway	Posten Norge	www.posten.no
Portugal	CTT Portugal Post	www.ctt.pt
Spain	Correos	www.correos.es
Sweden	PostNord Sverige	www.posten.se
Switzerland	<i>As explained above, the Swiss Post stopped its participation in the study; test mail was sent to Switzerland on behalf of other postal operators.</i>	
The Netherlands	PostNL	www.postnl.com
United Kingdom	Royal Mail Group plc	www.royalmailgroup.com

In 2018 the UNEX™ Monitoring System in Europe covered IPC European members' countries from IPC membership above together with:

Bulgaria	Bulgarian Posts plc	www.bgpost.bg
Croatia	Hrvatska Pošta	www.posta.hr
Czech Republic	Ceská Pošta	www.ceskaposta.cz
Estonia	Omniva	www.omniva.ee
Latvia	Latvijas Pasts	www.pasts.lv
Lithuania	Lietuvos Paštas	www.post.lt
Malta	<i>As explained above, MaltaPost plc did not participate in the 2018 study; test mail was sent from and to Malta on behalf of other postal operators.</i>	
Poland	Poczta Polska	www.poczta-polska.pl
Romania	<i>As explained above, Posta Româna did not participate in the 2018 study; test mail was sent from and to Romania on behalf of other postal operators.</i>	
Serbia (Republic of)	PE Post of Serbia	www.posta.rs
Slovak Republic	Slovenská Pošta	www.posta.sk
Slovenia	Pošta Slovenije	www.posta.si

The addresses of the postal operators above can be obtained upon request at unex@ipc.be.

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To find out more about IPC's UNEX™ Quality of Service Monitoring programme, please [click here](#).

More information on the UNEX™ system, its modules and technical documentation related to the 2018 CEN module results can be obtained via unex@ipc.be or found on www.ipc.be.

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Anexo 2

(Informação confidencial)

Contem uma página
com informação
confidencial