

**Decision on the objectives concerning the density of the postal network
and minimum services provided presented by CTT under paragraph 1 of Base XV of the
universal postal service concession**

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1. Introduction

CTT – Correios de Portugal, S.A. (CTT) submitted to ICP - Autoridade Nacional das Comunicações (ICP - ANACOM), through letter dated 30.12.2013¹ a proposal for indicators to be considered in the definition of objectives on i) density of postal establishments and other points of access to the postal network allocated to the concession and ii) minimum services provided, including rules on minimum operating periods of postal establishments, according to Base XV of the bases of the concession of the universal postal service (Bases of Concession), approved by Decree-Law No. 448/99, republished following amendments in annex to Decree-Law No. 160/2013, of 19 November.

In the above-mentioned letter, CTT referred that the quantification of indicators was at the stage of being concluded, and would be submitted subsequently.

In this scope, this Authority received on 03.02.2014 a proposal on indicators and respective quantification, by letter sent by CTT on 31.01.2014².

2. Regulatory framework

Base XV of the Bases of Concession lays down as follows:

- The concessionaire (CTT) must communicate to ICP-ANACOM [paragraph 1 of base XV]:
 - a) Density objectives for postal establishments and other points of access to the postal network allocated to the concession;
 - b) Objectives as regards the minimum services provided, including rules on minimum operating periods of postal establishments;
- Objectives and rules are set for three-year periods, and may be reviewed prior to the expiry of each period, where required by the exceptional circumstances of the case [paragraph 2 of base XV];
- The concessionaire must take specifically account of the following factors [paragraph 3 of base XV]:
 - a) Distribution of the population on national territory;
 - b) Distance between access points;
 - c) Urban or rural nature of areas covered;
 - d) Evolution of traffic and demand;
- The establishment of objectives concerning the density of the postal network and minimum services provided must take into due account the principles laid down in Law No. 17/2012, of 26 April (Postal Law), namely those set out in paragraph 2 a) and b)

¹ With reference No. 55068.

² With reference No. 50718.

thereof, so as to ensure the existence, availability, accessibility and quality of the universal service provision, as well as the economic and financial sustainability and viability of the universal service provision [paragraph 8 of base XV];

- In case ICP-ANACOM considers that objectives and rules presented by the concessionaire fail to meet the needs of users, the Authority must notify the concessionaire, stating its reasons, within 60 working days, so that the latter reviews such objectives and rules within 30 working days [paragraph 5 of base XV];
- If, after the review referred to in the preceding paragraph, ICP-ANACOM considers that objectives and rules presented by the concessionaire still fail to meet the needs of users, the Authority must issue a determination, having heard users and the concessionaire, within 60 working days, setting out the referred objectives and rules, based on factors indicated in paragraph 3 [paragraph 6 of base XV];
- Where ICP-ANACOM deems, further to the communication from the concessionaire referred to in paragraph 1 or to the reviewed proposal mentioned in the preceding paragraph, that objectives and rules presented by the concessionaire meet the needs of users, it must issue a decision approving the referred objectives, having heard users, within 50 working days [paragraph 7 of base XV].

Until objectives concerning the density of the postal network and minimum services provided for in base XV of the Bases of Concession have been defined, the concessionaire undertakes to maintain, at the very least, the density levels of the postal network and service provision practised by 31 December 2013 (paragraph 3 of article 5 of Decree-Law No. 160/2013, of 19 November).

3. Analysis of objectives proposed by CTT

3.1. Calculation of time limits

Time limits provided for in paragraphs 5 or 7 of base XV began to run on the date of reception by ICP - ANACOM of CTT's letter of 31.01.2014, that is, on 03.02.2014, as it was on this date that a full and quantified communication of objectives concerning the density of the postal network and minimum services provided took place, enabling their effective analysis.

This view was in fact conveyed to CTT through letter ANACOM-S016539/2014, of 18 March.

3.2 Duration of objectives

CTT proposes for objectives and rules to apply in the 2014/2016 period, that is, for a three-year period. Where required by the exceptional circumstances of the case, such objectives and rules may be reviewed prior to the expiry of this period.

ICP - ANACOM agrees with CTT's proposal, which corresponds to the period provided for in paragraph 2 of base XV of the Bases of Concession.

3.3 Objectives presented by CTT

Objectives presented by CTT are broken down according to:

- Objectives on the network density as far as postal establishments are concerned, that is, as regards locations where concessionary postal services are provided, namely post stations and post offices;
- Objectives on the density of letterboxes (“*marcos de correio* “ and “*caixas de correio*”), that is, on infrastructures provided for the public, where postal items may be deposited with the postal network by users;
- Objectives on minimum services provided, which concerns services provided at postal establishments, including objectives on minimum operating periods of postal establishments.

Objectives proposed by CTT are analysed below.

3.3.1 Density of postal establishments

CTT’s proposal:

In the scope of density objectives concerning postal establishments, CTT presents as criterion for the distribution of postal establishments, the maximum distance for accessibility to the service, expressed in meters covered by the residing population to reach the nearest postal establishment.

Indicators proposed by CTT are:

1. At national level, the concessionaire must guarantee a point of access within the maximum distance of 5000 meters from the place of residence for 90% of the population;
2. At the level of urban areas³, which include predominantly and moderately urban areas, the concessionaire must guarantee a point of access within the maximum distance of 3500 meters from the place of residence for 90% of the population;
3. At the level of rural areas, which include predominantly rural areas, the concessionaire must guarantee a point of access within the maximum distance of 8500 meters from the place of residence for 90% of the population.

According to CTT, the proposal for quantification of these indicators is based on:

- i) Population distribution at national level;
- ii) Urban or rural nature of residing areas, according to the typology of urban areas defined by the National Statistics Institute (INE) in 2009, adjusted according to the

³ According to the typology of urban areas defined by INE (Determination No 2717/2009, DR 188, II Series of 28.09.2009 – 8th (2008), taken by the *Secção Permanente de Coordenação Estatística* on the typology of urban areas), adjusted according to the 2013 administrative reorganisation of parishes, considering for the whole territory of the new parish the typology assigned in 2009 to the current town hall.

2013 administrative reorganisation of parishes, considering for the whole territory of the new parish the typology assigned in 2009 to the current town hall;

iii) The implementation of the (current) network of post stations and offices.

The location of residing population is based on data from the 2011 general population census, at the statistical subsection level.

In order to define influence areas for each postal establishment, CTT used the national road network database of InfoPortugal (2009).

Note that CTT define as:

- Postal establishments: *“locations where concessionary postal services are provided and where other services and products supplied by the concessionaire and by third parties may be purchased, namely post stations and post offices”*;
- Post stations: *“concessionaire establishments, also known as Lojas CTT (CTT stores), where concessionary postal services are provided and where other services and products may be supplied by the concessionaire and by third parties, according to the concessionaire’s objectives”*;
- Post offices: *“establishments of public or private bodies where, in parallel with other activities, concessionary postal services are provided, within the framework of a contract or other legal instrument concluded with the concessionaire”*.

ICP - ANACOM’s position:

1. It is deemed that the definition of objectives concerning the density of the network of postal establishments such as those proposed by CTT, based on the distance covered by populations to reach postal establishments, taking into account urban or rural areas of the national territory, helps to promote, on the one hand, the existence, availability, accessibility and quality of the universal service, and on the other, the sustainability and economic and financial viability of the universal service provision.
2. The effective suitability of objectives, however, depends also on quantitative levels (values) that are defined.
3. On this matter, objective levels presented by CTT, according to which up to 10% of the population may not live within 3500 meters or 8500 meters, according to whether users reside in urban or rural areas respectively, or within 5000 meters in national average terms, are likely to allow a significant part of the population to remain at a considerable distance from postal establishments, which calls into question their accessibility to the universal service, the quality of service provided and ultimately the fulfilment of their postal service needs. As such, these objectives are deemed to be insufficient.
4. Moreover, objectives proposed by CTT do not include measures that aim to guarantee, for example, maximum distances of (the whole) population to postal establishments, measures which are especially relevant in areas with lower rates of postal coverage (measured by the average area covered by each postal establishment), such as the case of rural areas and, specifically, the country’s interior districts.

5. CTT fails also to appropriately justify objective levels proposed. For example, no mention is made to the “distance between points of access”, factor referred in paragraph 3 b) of base XV, and no information is provided identifying the relation between objective levels proposed and the current situation.
6. On this last aspect, it should be referred that, according to available information on the network of postal establishments by the end of 2013, according to which there were 2443 postal establishments operating (including post stations and post offices), in average each postal establishment covers around 4293 inhabitants and an area of 38 Km².

To calculate distances of residing population to each postal establishment, CTT proposes to measure distances using the national road network.

At national level, according to the objective proposed by CTT, a postal establishment must be guaranteed within a maximum distance of 5000 meters from the place of residence for 90% of the population.

According to calculations made by ICP - ANACOM based on the network of postal establishments by the end of 2013, at national level postal establishments are at the most within 3000 meters, in a straight line, from the place of residence for 92.4% of the population and 4000 meters for 96.3% of the population. Note that the distance calculation method, used in calculations performed by ICP - ANACOM differs from the one used by CTT. ICP - ANACOM’s distance results are calculated based on a straight line and those calculated by CTT are based on the national road network. In principle, the same distance value in ICP - ANACOM’s methodology (for example 4000 meters in a straight line) will correspond to a greater distance in the methodology used by CTT.

Likewise, for urban areas (according to the definition proposed by CTT), calculations performed by ICP - ANACOM indicate that postal establishments are at the most within 2500 meters, in a straight line, from the place of residence for 90% of the population (and within 3000 meters for 95% of the population). CTT proposes a distance of 3500 meters from the place of residence for 90% of the population, using however, as referred above, a different methodology to calculate distances.

For rural areas, ICP - ANACOM estimates that postal establishments are at the most within 4500 meters, in a straight line, from the place of residence for 90% of the population (and within 5500 meters for 95% of the population). CTT propose a distance, measured on the basis of the national road network, of up to 8500 meters from the place of residence for 90% of the population.

7. Note that there are several EU Member States that present more ambitious indicators than those proposed by CTT as regards distances of the population to postal establishments, namely:
 - In the UK, 99% of the population must be at the most within three miles from the nearest postal establishment;
 - In Slovenia, the universal postal service provider must meet requirements for the set up of a post station in each municipality of the Slovenian territory, where 95% of the population must be at the most within 4.5 Km in a straight line from the nearest post station;

- In the Netherlands, the universal postal service provider must guarantee the distribution throughout the Dutch territory of customer service points providing a full range of services, within a radius of 5 Km for at least 95% of inhabitants;
- In France, post stations providing postal services (no bulk mail) must be located so that 99% of the national population and at least 95% of the population of each province (“department”) is within 10 km from a post station.

On the other hand, and regardless of objective values established, it must be stressed that the reference rate in all these cases clearly exceeds the 90% proposed by CTT.

8. It should be also referred that the simple distance of the population to postal establishments may not be enough to ensure access of users to a universal service with appropriate quality, that guarantees that their needs are met. For example, in urban areas with high population density, the simple fact that a postal establishment exists may not guarantee the access to services provided with quality and which meet the needs of users, as this situation may entail a high number of users at postal establishments and consequently long waiting times in queues.
9. This means that although CTT’s proposal bears in mind the rural or urban nature of areas covered, it does not take into consideration appropriately the effective population residing in cities and urban areas with a higher degree of population.
10. It must also be referred that of all objectives proposed by CTT (both those that concern postal establishments and other points of access, and those concerning minimum services provided), in no case does CTT present a relation between the distance of the population to postal establishments and the distance of the population to services effectively provided at establishments. Ultimately, the distance between the population and the access to a specific service may well exceed the distance between the (same) population and the nearest postal establishments.
11. As regards the proposal for objectives concerning postal establishments, only those to which the general public has access to must be considered, thus existing access points which are exclusive for contractual clients or companies must be excluded.
12. To define influence areas for each postal establishment, CTT uses the national road network database for 2009. Although the use of a database for the referred reference period is not to be excluded, the enforcement of density objectives that are established will benefit from the use of a more up-to-date database.

3.3.2 Density of letterboxes

CTT’s proposal:

CTT proposes as criterion for distribution of letterboxes (*marcos do correio* and *caixas de correio*):

- The density of letterboxes (defined as the number of inhabitants per letterbox, located in the public highway or in public access locations);

- Coverage of letterboxes (defined by the number of km² per letterbox, located in the public highway or in public access locations.)

Indicators proposed by CTT are as follows:

- a) At national level, the concessionaire must guarantee that the number of inhabitants per letterbox is lower than or equal to 1125 inhabitants;
- b) At national level, the concessionaire must guarantee that the number of km² per letterbox is lower than or equal to 9.9 Km².

CTT considers the definition of indicators on letterbox density and coverage objectives to be appropriate only at national level, taking into account, according to that operator:

- The growing fall of postal traffic, which is sharper for stamped mail, the type of mail deposited the most in letterboxes⁴ and;
- The increasingly low use of letterboxes for depositing mail.

The quantification proposed by CTT is based on:

- i) The number of letterboxes at national level;
- ii) The population residing in the country;
- iii) The area of the country.

It should also be noted that CTT defines as:

- *“marcos de correio”*: “infrastructures made available to the public, located on the public highway, where users may deposit postal items with the postal network”;
- *“caixas de correio”*: “infrastructures made available to the public, located on the public highway or in public access locations, where users may deposit postal items with the postal network”.

ICP - ANACOM’s position:

1. It is considered that the definition of objectives on the density of letterboxes, such as those proposed by CTT, which regardless of the proposed objective level, take into account the density and coverage of such equipment, contributes to the definition of a minimum level of accessibility to the network.
2. However, the proposal presented by CTT fails to take into account appropriately the population distribution within the national territory, the urban or rural nature of covered areas and the distance between these points of access, as it only consists of the definition of objective levels for the national total.
3. For this reason, ICP - ANACOM takes the view that the proposal does not meet user needs, as the presented proposal fails to ensure accessibility to the universal postal service.

⁴ Argument mentioned by CTT in the referred letter of 30.12.2013.

4. On the other hand, the proposal fails to clarify the scope of letterboxes taken into consideration. For example, there is no mention of situations where there is more than one letterbox in the same location, for example one for standard mail and another for express mail, or for example whether letterboxes for easy mail are also taken into account.
5. In this regard, it should be mentioned that statistical data collected every quarter by ICP - ANACOM on the sector include information on this equipment, and by definition the number of geographical points where equipment is located is to be accounted for, that is, in locations where there is more than one piece of equipment, only one should be accounted for.
6. For the sake of consistency, a similar definition should be adopted for the purpose of the definition of density objectives concerning letterboxes.
7. It should be referred that, according to the referred statistical information collected by ICP - ANACOM, the number of letterboxes by the end of 2013 amounted to 9032, corresponding to an average density of around 1161 inhabitants per letterbox and an average coverage of around one letterbox per 10 Km².
8. Given that some of this equipment may be installed, by definition, in locations not accessible 24h a day, it is considered that CTT's proposal should be recast to include only situations where equipment is accessible for a daily minimum period of time, excluding indicators that present a daily period of access shorter than the one that is defined.
9. In terms of the definition of accessibility of the population to letterboxes, it is also acknowledged that an indicator on the percentage of parishes served by at least one letterbox, for the daily collection of items of correspondence deposited therein, would be relevant. It is stressed that, in the context of the electronic communications universal service, the obligation to install one public pay-phone per parish and an additional public pay-phone for each parish with more than 1000 inhabitants was established in the scope of the Official Administrative Map of Portugal (CAOP) for 2010.
10. Letterboxes accessible only to a part of users, namely only to companies, are not to be considered.

3.3.3. Indicators on minimum services provided

CTT's proposal:

CTT proposes the following six indicators as regards objectives on minimum services provided:

- a) The concessionaire must ensure, at national and international level, the provision of postal services covered by the universal postal service, where applicable, in compliance with the respective standards of service defined under Law No. 17/2012, of 26 April.

The concessionaire must also ensure the provision of: (i) a delivery service for the blind and (ii) a postal order service, of a national scope;

- b) the provision of postal services covered by the universal postal service must be guaranteed at postal establishments taking into account the level of demand of services, client segments and conditions and physical assets of the referred establishments;
- c) The provision of all concessionary services must be ensured at least by one postal establishment per municipality;
- d) The percentage of postal establishments that provide all concessionary services aimed for the occasional segment, in the total of postal establishments, must be at least 75%;
- e) The number of postal establishments opened to the public less than 5 days and/or 15 hours per week must not exceed 2.5% of all postal establishments;
- f) The concessionaire must adopt measures that ensure the ease of use of the service by users with special needs, namely by adapting structures where that service is provided so as to ensure an easy access, in compliance with technical standards on accessibility of urban buildings laid down in a specific statutory instrument (Decree-Law No. 163/2006, of 8 August).

ICP - ANACOM's position:

1. As regards the first indicator proposed by CTT, which is not really an indicator, just like the second indicator proposed, in any case it is deemed that to the reference on the issue of postal orders must be added the reference to the payment of postal orders, as well as the issue and sale of stamps, stamped postcards, and other stamped forms bearing the word "Portugal".
2. It is considered that the indicator: *"The percentage of postal establishments that provide all concessionary services aimed for the occasional segment, in the total of postal establishments, must be at least 75%"* must include the specific reference to services under consideration, provided in at least 75% of postal establishments. CTT, in its letter of 31.01.2014 clarify that the following services are included: standard mail, express mail, easy mail, registered mail, insured mail, books and postal parcels, postal orders (issue and payment) and charges.

The most recent available information on services provided at postal establishments operating by the end of 2013 shows that 75% of postal establishments provided the referred services, value which corresponds to the figure proposed by CTT.

It is deemed that the total of postal establishments to be considered in the calculation of this indicator, for the purpose of consistency with indicators on density objectives for postal establishments should not consider those the access to which is exclusive for contractual clients or companies.

3. It should be referred that CTT fails to present specific objectives as regards the provision of the service of postal summons and notifications at postal establishments, which is reserved to CTT until 31.12.2020. According to available information, this service is provided in around 30% of postal establishments.
4. CTT proposes an indicator that limits the percentage of postal establishments with a significantly short period of working hours: *"The number of postal establishments opened*

to the public less than 5 days and/or 15 hours per week must not exceed 2.5% of all postal establishments”.

According to available information, by the end of 2013, 39 postal establishments are opened to the public less than 5 days and/or 15 hours per week, which corresponds to 1.6% of all postal establishments operating by the end of 2013 (2443), a value which is lower than that proposed by CTT (2.5%).

In this regard, the objective should indicate criteria for the application of short working hours, as proposed by CTT.

This objective may not guarantee accessibility and quality in the provision of the universal postal service, hindering the fulfilment of user needs, in case situations under consideration, although limited to 2.5% as proposed by CTT, are concentrated in one or some zones of the country, implying that in that area or areas, the access to postal services occurs in very brief periods over the week.

5. As regards the period of the day during which postal establishments are open, an aspect on which no specific indicator proposal is made by CTT, this company is better informed on the period of the day during which postal establishments should operate, taking demand into consideration, and in any case accessibility to the services should be ensured, as results from paragraph 8 of base XV of the Concession and the Postal Law.

3.4. Reporting to ICP - ANACOM

CTT must present a proposal as regards reporting regularly to ICP - ANACOM the values verified for objectives that are defined, in addition to specific information on postal establishments and other points of access (such as letterboxes) operating by the end of each reporting period, including alterations occurred between each reporting period and the respective grounds, identifying, for example:

- For each postal establishment: type (station, office, etc.), designation, address, district, municipality, parish, geographical coordinates, services provided, working hours,
- For each letterbox: type, address, district, municipality, parish of location, geographical coordinates, time of last collection.

4. Determination

Taking into consideration:

- The proposal on density objectives for the postal network and minimum services provided, presented by CTT;
- The analysis of the referred proposal, presented above in chapters 1 to 3,

ICP - ANACOM's Management Board, in the exercise of powers conferred under paragraph 1 b), d), h) and n) of article 6 and article 26 b), all of its Statutes, approved by Decree-Law No. 309/2001, of 7 December, as well as under paragraph 1 of article 8 of Law No. 17/2012, of 26

April, as amended by Decree-Law No. 160/2013, of 19 November, and by Law No. 16/2014, of 4 April, to fulfil and comply with objectives and principles established in paragraph 2 a), b) and d) of the referred Law and under paragraph 5 of base XV of the Bases of Concession of the Universal Postal Service, approved by Decree-Law No. 448/99, of 4 November, republished, with amendments, in annex to Decree-Law No. 160/2013, of 19 November, hereby determines as follows:

1. Objectives and rules on the density of the postal network and minimum services provided, presented by CTT by letter dated 31.01.2014, fail to meet user needs under the current legal framework;
2. CTT must review such objectives and rules, under paragraph 5 of base XV of the Bases of Concession of the Universal Postal Service, within 30 working days, taking into account views taken by this Authority thereon and respective reasoning, set out in chapters 3.3.1, 3.3.2 and 3.3.3 of the analysis, as well as in chapter 3.4., as regard the reporting of information to ICP - ANACOM;
3. The reviewed proposal submitted by CTT must attach: (i) detailed reasoning based on factors indicated in paragraph 3 of base XV of the Concession; (ii) indication, where appropriate, of values currently practised in its postal network corresponding to indicators and objectives proposed, explaining the reasons for differences between current values and proposed ones.

Appendix - European experiences

Several European countries have defined obligations on the accessibility to postal establishments and letterboxes, that is, to points of access to the network of the universal service provider.

Postal establishments:

Country	Criterion
AT	The minimum number of postal establishments is 1650, available throughout that country. In locations with more than 10 000 inhabitants, and in all district capitals at least 90% of the population, must have access to postal establishments within 2000 meters, or, in all other areas, within 10 000 meters.
BE	The universal postal service provider must ensure at least 1300 points of access to postal services (including post stations) and at least one in each "community", that is, 589.
BG	One post station per a specific number of inhabitants.
CZ	The population must be able to get to the post station using public transports, and where this is not possible, residential areas should be within 2 km from a post station.
DK	At least one postal establishment in each municipality and each city with more than 5000 inhabitants. The maximum distance (in a straight line) travelled by a consumer should not exceed 5 km. In cities with a number of inhabitants between 2000 and 5000, the provider of the universal postal service must not close a postal establishment unless it is replaced by a new one. In small cities and villages, postal establishments may not be closed in case the distance of users to the nearest postal establishment increases by more than 10 km in a straight line.
EE	One post station per city and per parish. Additional post stations must be established in cities with more than 20 000 inhabitants, for each 20 000 inhabitants, and in each parish with more than 2500 inhabitants.
FI	According to the Finnish postal law, the provider of the universal postal service must maintain customer service points where products and services covered by the scope of the universal service are made available, without any obstacles and within a reasonable distance from the permanent residence of clients. The density of the population in the region and the coverage of customer service points must be taken into account in the determination of the location of customer service points and in the definition of reasonable distance. The provider of the universal postal service must, in each municipality, maintain at least one customer service point providing universal services. Other provisions on the location of customer service points may be established by Government decree.
FR	Post stations providing postal services and not bulk mail must be located so that 99% of the national population and at least 95% of the population in each province

("department") is within 10 km from a post station. In locations with more than 10 000 inhabitants, there must be at least one post station per each 20 000 inhabitants.

GE No provider of universal postal service has been designated in Germany. Requirements in force for postal establishments are set out in secondary legislation.

In Germany there must be at least 12 000 fixed postal facilities. In each community with more than 4000 inhabitants there must be at least one fixed postal facility. In urban areas, clients should be within 2000 meters from the nearest fixed postal facility. In each rural district, there must be at least one fixed postal facility for each 80 Km².

HU In cities with less than 600 inhabitants, the provider of the universal postal service must ensure a fixed postal establishment or a mobile station. In cities between 600 and 1000 inhabitants, the provider of the universal postal service must ensure a fixed postal establishment, or in case of agreement with the municipality, a mobile station. In cities with more than 1000 inhabitants, the provider of the universal postal service must ensure a fixed postal establishment. In cities with more than 20 000 inhabitants, there must be at least one fixed postal establishment per each 20 000 inhabitants, and users must be able to travel, in a straight line, not more than 3 km to the nearest postal establishment, and the distance between two postal establishment must not exceed 6 km in a straight line.

IT The provider of the universal postal service must ensure the provision of services included in the universal service obligation at least five days a week, within all national territory.

In administrative units (small cities and towns) with only one post station, the latter may not be closed and must operate at least three working days and eighteen hours a week.

LT In urban areas, users must be within 3 km. In rural areas, there must be a point of access per locality.

MT The USP must ensure at least 59 postal outlets.

NL The provider of the universal postal service must ensure a network of at least 2000 customer service points, 902 of which must provide a full range of services. The provider of the universal postal service must also guarantee that the referred network of customer service points complies with the following requirements: (i) distribution throughout all the Dutch territory of customer service points providing a full range of services, in a range of 5 km for at least 95% of residents; (ii) distribution of customer service points providing a full range of services outside urban centres with more than 5000 inhabitants, in a range of 5 km for at least 85% of residents. The full range of services is defined by ministerial regulation.

PL The postal operator must establish at least 8240 contact points throughout the country, which must be located taking into account service demand in specific areas. The postal operator's contact point must cover in average in the country: (i) 7000 inhabitants in urban areas; (ii) an area of 85 km² in rural areas. At least one contact point of the postal operator must be established in each *gmina* (main unit of administrative division in Poland, at the lowest level). In case of *gmina* with more than 5000 inhabitants, it may be served also by the area of operation of the contact point located in the area of the neighbouring *gmina* or through a mobile contact point of the postal operator, insofar as: (i) the place of installation ensures a more efficient customer service provided to clients

residing in the area covered by this point of contact; (ii) the location is agreed with the *gmina* authorities.

- RO For each location there must be at least one post station.
- SI The provider of the universal postal service must comply with requirements to install a post station in each municipality of the Slovenian territory, where 95% of the population must be within 4.5 km from the nearest post station, in a straight line.
- UK The Post Office must achieve the following indicators: i) 99% of the population must be within 3 miles from the nearest postal establishment; ii) 90% of the population must be within one mile of the nearest postal establishment; iii) 99% of total population in deprived urban areas in the whole country must be within one mile of the nearest postal establishment; iv) 95% of total urban population in the whole country must be within one mile of the nearest postal establishment; v) 95% of total rural population in the whole country must be within three miles of the nearest postal establishment; vi) 95% of the population of each postal code must be within 6 miles of the nearest postal establishment.

Source: ERGP reports and ANACOM research.

Notes: BE – Belgium, BG – Bulgaria, CY – Cyprus, CZ – Czech Republic, DK – Denmark, GE – Germany, EE – Estonia, GR – Greece, FI – Finland, FR – France, IE – Ireland, LV – Latvia, LT – Lithuania, NL – The Netherlands, HR – Croatia, HU – Hungary, MT – Malta, AT – Austria, PL – Poland, RO – Romania, SI – Slovenia, SK – Slovakia and UK – United Kingdom

Letterboxes:

Country	Criterion
AT	In populous residential areas, the distance to a letterbox must not exceed 1km.
BE	There must be at least one letterbox per “community”, that is, 2359 (situation in 1971).
BG	One collection from letterboxes per a specific number of inhabitants, depending on the type of location.
CY	The provider of the universal postal service must ensure the sitting of at least one letterbox per 1000 inhabitants for the collection of items of correspondence, and at least one letterbox in localities with less than 1000 inhabitants.
CZ	In each residential area with a higher degree of demand (touristic areas), the universal postal service provider must increase the number of letterboxes.
DK	The provider of the universal postal service must ensure an appropriate number of letterboxes.
EE	All cities or parishes must be provided with at least two letterboxes. In cities the minimum distance is 0.5 km and in parishes it is 2 km.
GE	Users in usually contiguous constructed areas must, as a rule, be within 1000 meters from a letterbox.
GR	A letterbox in each rural locality and at least one letterbox for each 1000 inhabitants in urban areas.
HU	The USP must set up a letterbox in all cities with a post station, which must be within 1 km from users, and distance between letterboxes must not exceed 2 km.
IE	The Irish regulator decided that users should not travel more than 1 km in urban areas with 1500 inhabitants or more than 3 km in rural areas to reach a point of access.
LV	In the capital city, Riga, there must be one letterbox per 5000 inhabitants, in other cities one letterbox per 3000 inhabitants, and in rural areas one letterbox per parish and one letterbox in post stations.
LT	In urban areas, letterboxes must be within 2 km in a straight line. In rural areas with more than 200 addresses, there must be a letterbox.
MT	In localities with density above the average national density, 98% of users must be within 400 m of a letterbox; in other locations with a lower density, the distance is 800 m to a letterbox.
NL	In residential centres with more than 5000 inhabitants, the provider of the universal postal service must provide a letterbox within a radius of 500m for the deposit of items of correspondence. In other areas, the provider of the universal postal service must provide a letterbox within a radius of 2500m.

- PL The number of letterboxes set by the postal operator in a specific postal area must be adjusted to the needs of the local community.
- RO At least one point of access per locality.
- SI One letterbox: in cities with less than 5 000 inhabitants for each 400 inhabitants; in cities between 5 001 and 25 000 inhabitants, for each 700 inhabitants; in cities between 25 001 and 80 000 inhabitants, for each 1 000 inhabitants; in cities between 80 001 and 250 000 inhabitants, for each 1 300 inhabitants and in cities with more than 250 000 inhabitants, for each 1 500 inhabitants.
- UK Obligation on the USP to report every year: i) the percentage of distribution points in all territory, where there must be one letterbox at 0.5 miles in a straight line from its facilities, including the methodology used (system used and measures taken to make this calculation); ii) total number of letterboxes in all the country and per nation, including a comparison with the previous year, where appropriate; number of complaints received by the USP by users in a given year, concerning the provision/location of letterboxes.

Source: ERGP reports and ANACOM research.

Notes: BE – Belgium, BG – Bulgaria, CY – Cyprus, CZ – Czech Republic, DK – Denmark, DE – Germany, EE – Estonia, GR – Greece, FI – Finland, FR – France, IE – Ireland, LV – Latvia, LT – Lithuania, NL – The Netherlands, HR – Croatia, HU – Hungary, MT – Malta, AT – Austria, PL – Poland, RO – Romania, SI – Slovenia, SK – Slovakia and UK – United Kingdom

Working hours at points of access:

Country	Criterion
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AT	As a rule, postal establishments must work on a daily basis at least five working days a week and must not operate less than twenty hours every week, except for postal establishments managed by a municipality, which must operate a total of at least fifteen hours, three working days a week.
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The working hours of postal establishments must take into account user needs in the respective locality and may be extended to Saturdays, Sundays and holidays.

BE	The Belgian provider of the universal postal service is obliged to maintain post stations open a few hours outside normal working hours.
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HR	The provider of the universal postal service determines working hours of post stations according to user needs, the quality of service and other market requirements. Post stations work full-time, part-time and extended working hours (from 7 am to 12 pm).
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CY	At least the same working hours as the public service.
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CZ	At least one post station must operate in residential areas with more than 10 000 inhabitants on Saturdays.
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At least one post station must operate in residential areas with more than 100 000 inhabitants and in each metropolitan region on Sundays.

At least one post station must operate in residential areas with more than 250 000 inhabitants, every day until 12 pm (on an around-the-clock basis). This condition is not required on Sundays and holidays where the following day is a holiday.

EE	Postal establishments open at the earliest at 8 am, and close at the latest at 6 pm. Post stations must work at least two hours a day.
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GE	Operation 6 days a week, according to demand.
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GR	Most post stations of the universal postal service provider operates from 7:30 am to 14 pm on working days (Monday to Friday, excluding national holidays) However, there are specific post stations with a high degree of users (for example, airport and centre of Athens) where post stations are open 7 days a week and operating from early morning until night.
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HU	Working hours of fixed postal establishments managed by the universal postal service provider and by licensed postal service providers must take into account needs and volume of the business.
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Working hours must occur over a continuous period or divided in two parts.

Postal establishments operating less than two hours a day are not considered as permanent postal establishments. Fixed postal establishments managed by the universal postal service provider and by licensed postal service providers must provide at least two hours of daily service between 7 am and 20 pm.

In cities with at least 15 000 residing inhabitants there must be at least one postal establishment operating on a daily basis at least six hours all working days, where one operating hour must be before 8 am or after 5 pm.

IT The provider of the universal postal service must ensure the provision of services included in the universal service obligation at least five days a week, in all national territory.

In administrative units (small cities and towns) with only one post station, the latter may not be closed and must operate at least three working days and at least eighteen hours a week.

MT Proposals for alteration of working hours of postal establishments must be notified to the regulator at least twenty working days ahead and may only be applied where approved by the regulator.

RO 8 hours per day.

RS The universal postal service provider must ensure the collection of postal items in post stations during the day, every working day, not less than five days per week, save in case of national and religious holidays, *force majeure* and for reasons such as an illness and safety of staff.

The universal postal service provider may also designate which postal stations must be opened on Saturdays, Sundays and holidays.

Working hours of post stations providing the universal service must be laid down in a special statutory instrument of the universal service provider, which must be approved by the regulator.

Permanent post stations must operate at least 2 (two) hours per day. The universal postal service provider may change working hours of post stations, but only after an economic analysis that justifies such change, informing the regulator thereof.

SK For post stations in residential units/villages, the following has been defined:

- Less than 3000 inhabitants, or in an area of the sub-region, with less than 5000 inhabitants: working hours on working days occur in the morning and/or afternoon period and not less than 3 hours per working day. It must operate at least once per week in the afternoon, or at least once per week until 5 pm;
- 3001 to 5000 inhabitants: working hours on working days run, at least, between 8:30 am and 3 pm, including technological and operational interruptions or lunch breaks and at least one working day until 5 pm;
- 5 001 to 10 000 inhabitants: working hours on working days run, at least, between 8:30 am and 4 pm, including technological and operational interruptions or lunch breaks and at least one working day until 5 pm;
- 10 001 to 50 000 inhabitants: working hours on working days run from 8 am to 5 pm.
- More than 50 000 inhabitants: working hours on working days run from 8 am to 6 pm, designated post stations start operating at 7 am.

SI Five working days, at least two consecutive hours. On working days and once a week, two consecutive hours after 3 pm.

Source: ERGP reports and ANACOM research.

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