

**Decision on the objectives of postal network density and minimum services
provided**

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1. Introduction

By determination of Autoridade Nacional de Comunicações (ANACOM), of 28.08.2014, the objectives of postal network density and minimum services provided were defined for the period from 01.10.2014 to 30.09.2017 [under Base XV of the Bases of the Universal Postal Service Concession (Bases of Concession), as amended by Decree-Law No. 160/2013, of 19 November, which republished it].

Being the communication of the referred objectives incumbent on CTT - Correios de Portugal, S.A. (CTT), as the concessionaire of the universal postal service [under paragraph 1 of the referred base XV], ANACOM, by fax dated 17.02.2017¹, requested CTT to submit a proposal on objectives of postal network density and minimum services provided, to apply from 01.10.2017 to 30.09.2020.

By letter No. 51028, of 09.03.2017, CTT notified ANACOM of its proposal on the referred objectives.

By determination of 05.06.2017, ANACOM considered that objectives and rules of postal network density and minimum services provided, presented by CTT on 09.03.2017, failed under the current legal framework to meet user needs in some cases.

Subsequently, by letter No. 53099, of 18.07.2017, CTT communicated to ANACOM, within the required time limit, a revised proposal of objectives of postal network density and minimum services provided.

By determination of 27.07.2017, the Management Board of ANACOM approved a Draft Decision on the objectives of postal network density and minimum services provided (DD), which:

1. Established that objectives and rules of postal network density and minimum services provided presented by CTT in its letter of 18.07.2017, under paragraph 5 of base XV of the Universal Postal Service Concession, still failed to meet user needs under the current legal framework, as regards indicators and objectives of opening hours of postal establishments;

¹ With reference ANACOM-S004967/2017.

2. Set out the objectives and rules of postal network density and minimum services provided, laid down in Annex 2 to the DD;
3. Submitted point 2 to the prior hearing of CTT (pursuant to paragraph 6 of base XV of the Concession and to articles 121 *et seq* of the Administrative Procedure Code) and to the consultation of users (pursuant to paragraph 6 of base XV of the Concession), for a period of 20 working days.

Contributions received were analysed in the scope of the “Report of the prior hearing of CTT and consultation of users on the Draft Decision on the objectives of postal network density and minimum services provided”, deemed to be an integral part of this decision.

2. Regulatory framework

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

- a) It is incumbent on the concessionaire to communicate to ANACOM [paragraph 1]:
 - Density objectives of postal establishments and other points of access to the postal network allocated to the concession.
 - Objectives of minimum services provided, including rules on minimum operating periods of postal establishments.
- b) 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].
- c) The concessionaire is required to take account, specifically, of the following factors [paragraph 3]:
 - Distribution of the population within the national territory.
 - Distance between points of access.
 - Urban or rural nature of covered areas.
 - Evolution of traffic and demand.

- d) The establishment of objectives of postal network density and minimum services provided must take into due account principles laid down in Law No. 17/2012, of 26 April² (Postal Law), namely those set out in points a) and b) of paragraph 2 of article 2 thereof, so as to ensure the existence, availability, accessibility and quality of the provision of the universal service, as well as its economic and financial sustainability and viability [paragraph 8].
- e) In case ANACOM considers that objectives and rules presented by the concessionaire fail to meet user needs, the Authority, stating its reasons, requests the concessionaire, within 60 working days, to revise the referred objectives and rules within a 30-working day time limit [paragraph 5].
- f) Further to the revision referred to in the preceding paragraph, in case ANACOM considers that objectives and rules presented by the concessionaire still fail to meet user needs, the Authority issues 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 of base XV [paragraph 6].
- g) Where ANACOM deems that objectives and rules presented by the concessionaire meet user needs, the Authority issues a decision approving the referred objectives, having heard users, within 50 working days [paragraph 7].

3. Period of application of objectives

[Original] proposal submitted by CTT, on 09.03.2017:

In its original proposal, CTT proposed that indicators and respective objectives remained in force for a three-year period, from 01.10.2017 (inclusive) until 30.09.2020 (inclusive), and that they would be ensured by the concessionaire (CTT) every day of application of the contract, save for situations for which the concessionaire was not responsible.

² Law No. 17/2012, of 26 April, subsequently amended by Decree-Law No. 160/2013, of 19 November, and by Law No. 16/2014, of 4 April.

ANACOM Decision of 05.06.2017:

ANACOM agreed with the period of application presented by CTT, which corresponds to the duration (three years) provided for in paragraph 2 of base XV of the Bases of Concession.

However, the Regulatory Authority did not accept that objectives were ensured “save for situations for which the concessionaire was not responsible”. The Authority referred that, in the case of situations where density objectives to be defined are not fulfilled, it must be determined, on a case-by-case basis and in line with the Bases of Concession, whether CTT is liable for wilful acts or omissions leading to such situations, a judgement that takes place in the framework of powers of supervision provided for in the concession contract, which is essential to apportion liability in that respect.

[Revised] proposal submitted by CTT, on 18.07.2017:

CTT maintains its proposal that indicators and respective objectives remain in force for a three-year period, from 01.10.2017 (inclusive) until 30.09.2020, and that they are ensured by the concessionaire every day of their application.

Compared to the original communication, CTT eliminated from its proposal the condition according to which objectives would only be ensured by the concessionaire save for situations for which it was not responsible.

CTT clarified that the inclusion of that condition in its original proposal was intended only to safeguard the possibility of situations where objectives are not met due to *force majeure* events or of phenomena which CTT may not be able to control, without prejudice to a case-by-case analysis of each incident, adding that the Bases of Concession themselves lay down (in Base XXX) that in cases of *force majeure*, obligations arising from the concession contract are suspended for the period corresponding to the duration of the case of *force majeure*, the original proposal of CTT thus being a mere reflection of that general principle of the applicable legal framework.

Position taken by ANACOM:

ANACOM maintains its agreement with the period of application presented by CTT, which corresponds to the duration (three years) provided for in paragraph 2 of base XV of the Bases of Concession.

As regards the withdrawal by CTT of the condition “save for situations for which the concessionaire was not responsible”, ANACOM stresses that it meets the decision taken by this Authority on 05.06.2017, and that there is no need, nor benefit, to reflect in specific rules on postal network density and minimum services provided, general principles on *force majeure* situations already provided for in the concession contract, pursuant to which objectives here at stake are determined.

4. Objectives notified by CTT

CTT proposes objectives of:

- a) 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.

For these objectives, CTT proposes that current indicators of postal network density and respective objective values³ are maintained.

- b) Network density as far as letterboxes are concerned, that is, infrastructures made available to the public, where postal items may be deposited by users with the postal network.

In this communication of 18.07.2017, CTT proposes that density indicators and objectives of letterboxes are maintained, and that they are complemented as regards access, in each parish, to letterboxes for deposit of national standard mail.

- c) Minimum services provided, which concerns services provided at postal establishments, including also objectives of minimum operating periods of postal establishments.

³ Defined in ANACOM's decision of 28.08.2014 - <https://www.anacom.pt/render.jsp?contentId=1323392>.

CTT proposes that indicators and respective objectives of minimum services provided currently in force are maintained, except for indicators of minimum operating periods of postal establishments, which CTT proposes to revise.

CTT also proposes some methodological changes for the purpose of the measurement of indicators, which shall be analysed in the scope of the specific analysis of the various indicators and objectives.

It must be highlighted that, in line with ANACOM's decision of 05.06.2017, CTT removed from its proposal the intention to:

- a) Establish a remedy period of three months to address occurrences with post offices, for which CTT is not responsible;
- b) Establish a remedy period of 10 working days to clarify any one-off situations of differences between operating periods of post offices reported by CTT and those checked on the ground by ANACOM.

These aspects will thus not be subject to any further analysis in this decision.

4.1. Density of postal establishments

Current situation

Table 1 presents density indicators and objectives of postal establishments, in force up to 30.09.2017.

Table 1. Density indicators and objectives of postal establishments

1. At national level, the concessionaire shall guarantee that the average number of inhabitants per postal establishment is lower than or equal to 4600 inhabitants.
2. At national level, the concessionaire shall guarantee one postal establishment within the maximum distance of 6000 meters from the place of residence for 95% of the population.
3. At the level of urban areas, which include predominantly and moderately urban areas, the concessionaire shall guarantee one postal establishment within the maximum distance of 4000 meters from the place of residence for 95% of the population.
4. At the level of rural areas, which include predominantly rural areas, the concessionaire shall guarantee one postal establishment within the maximum distance of 11 000 meters from the place of residence for 95% of the population.
5. In parishes with more than 20 000 inhabitants, the concessionaire shall guarantee at least one postal establishment providing the full range of concessionary services and an additional postal establishment providing the same range of services, for every additional 20 000 inhabitants.

6. In parishes where the number of inhabitants exceeds 10 000 and is equal to or lower than 20 000 inhabitants, the concessionaire shall guarantee at least one postal establishment providing the full range of concessionary services.

Source: ANACOM decision of 28.08.2014.

[Original] proposal submitted by CTT, on 09.03.2017:

CTT proposed the maintenance of the current set of density indicators of postal establishments and respective objectives.

CTT proposed also a methodological change in the measurement of indicators of maximum distance of accessibility to services. This change consists of the use of typologies of urban areas defined by INE in 2014⁴ (TIPAU 2014), replacing typologies of urban areas currently used, which correspond to those defined by INE in 2009⁵. This proposal is relevant for the purpose of the calculation of indicators 3 and 4 set out in Table 1.

Furthermore, CTT proposed a change in the methodology for calculation of indicators of maximum distance of accessibility to services (indicators 2 and 4). The calculation of these indicators was performed so far by ANACOM. It resulted from CTT's proposal that the calculation of these Indicators would be undertaken "*... by CTT and ANACOM, the database of Portugal's road network acquired by each of these bodies being used to define the areas of influence of each postal establishment*".

ANACOM Decision of 05.06.2017:

ANACOM considered it appropriate:

- a) To maintain the current set of density indicators of postal establishments and respective objectives;
- b) To use the typologies of urban areas defined by INE in 2014, as they are more recent than those that are actually taken into account.

⁴ According to INE Determination No. 1494/2014, Official Gazette No. 144, II Series, of 29.07.2014, known as TIPAU 2014, bearing in mind the Official Administrative Map of Portugal resulting from the implementation of the Municipal Territorial Administrative Reorganisation (CAOP 2013).

⁵ The administrative reorganisation of the territory of parishes in 2013 being adjusted (2013 version of the Official Administrative Map of Portugal - CAOP), to consider for the whole territory of the new parish the typology assigned in 2009 to the former town hall.

ANACOM did not accept the change, proposed by CTT, according to which the calculation of indicators 2, 3 and 4 would be performed both by CTT and by ANACOM. Not only did the Authority consider that CTT's proposal was not substantiated, but it also considered that this change would lead to the achievement of different results, which could create market confusion and an absence of clear references for assessing compliance with these objectives. Therefore, without prejudice to the report by CTT of values achieved by those indicators (2, 3 and 4), this Authority considered that the relevant calculation for assessing compliance with the corresponding objectives should continue to be incumbent on ANACOM, using for the purpose an up-to-date road network database.

[Revised] proposal submitted by CTT, on 18.07.2017:

CTT clarifies that it had not intended calculations performed by both CTT and ANACOM to be used for the purpose of checking values achieved for indicators 2 and 4. It merely aimed to describe the way how each body calculated indicators, using road network databases, noting on this subject that the company is not aware whether ANACOM intends to maintain the road network database currently used and the respective updating period.

In this context, the wording now put forward by CTT remains the same as that currently in force, under ANACOM Decision of August 2014.

As regards the other issues, CTT maintains its original proposal, namely:

- a) To maintain the current set of density indicators of postal establishments and respective objectives;
- b) To use the typologies of urban areas defined by INE in 2014 (TIPAU 2014), to measure indicators of maximum distance of accessibility to services.

Position taken by ANACOM:

ANACOM restates that it agrees with the use of typologies of urban areas defined by INE in 2014 (TIPAU 2014), to measure indicators of maximum distance of accessibility to services, as they are more recent.

As regards the calculation of indicators 2, 3 and 4, it is deemed, as results from CTT's current proposal, that ANACOM should continue to perform it, using for the purpose an up-to-date road network database.

As regards the road network database to be used by ANACOM, the wording presented by CTT on 09.03.2017 had the advantage of not making any reference to a specific commercial offer, which ANACOM finds to be beneficial, thus it is deemed that such wording should be adopted, duly adjusted, to the detriment of the wording now presented by CTT.

In this case, ANACOM will notify CTT of the road network database to be used and whenever any amendment is introduced thereto. Where the use of a different database results in significant changes in values achieved by indicators, this will be relevant to assess compliance with objectives or to revise such objectives, only to the extent that results from the adoption of a different database.

In this respect, ANACOM informs that it intends to use a different road network database, with proper up-to-date information, for the calculation of the referred indicators of maximum distance of accessibility to services.

Table 2 presents a comparison of values achieved by the end of 2016, with the current methodology (using the current road network database and current typologies of urban

areas) and with the methodology that takes into account the road network database to be used in the future by ANACOM and the new TIPAU 2014 typologies of urban areas.

It may be seen that the global impact (incorporating both changes) is minor, ranging from - 0.2 percentage points (p.p.) and +0.2 p.p., thus the change of values of objectives related to indicators under consideration seems not to be required.

Table 2 – Objectives related to distances of accessibility: comparison between values achieved with the current and the new methodology

Objective	Value in the 4th quarter of 2016 (cfr. applicable calculation methodology)	Value in the 4th quarter of 2016 (using TIPAU 2014 and the new road network database)	Difference (p.p.)
At least one postal establishment within the maximum distance of 6000 meters from the place of residence for 95% of the population, at national level.	96.80%	96.80%	0 p.p.
At least one postal establishment within the maximum distance of 4000 meters from the place of residence for 95% of the population, at the level of urban areas.	95.90%	95.90%	0 p.p.
At least one postal establishment within the maximum distance of 11 000 meters from the place of residence for 95% of the population, at the level of rural areas.	97.00%	97.20%	+ 0.2 p.p.
The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment is of 8500 meters for 97.5% of the population, at national level. (a)	97.90%	97.80%	- 0.1 p.p.
The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment is of 5500 meters for 97.5% of the population, at the level of urban areas. (a)	98%	97.80%	- 0.2 p.p.
The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment is of 15 000 meters for 97.5% of the population, at the level of rural areas. (a)	98.40%	98.30%	- 0.1 p.p.

Source: ANACOM.

(a) Objectives of minimum services provided, analysed in Chapter 4.3.

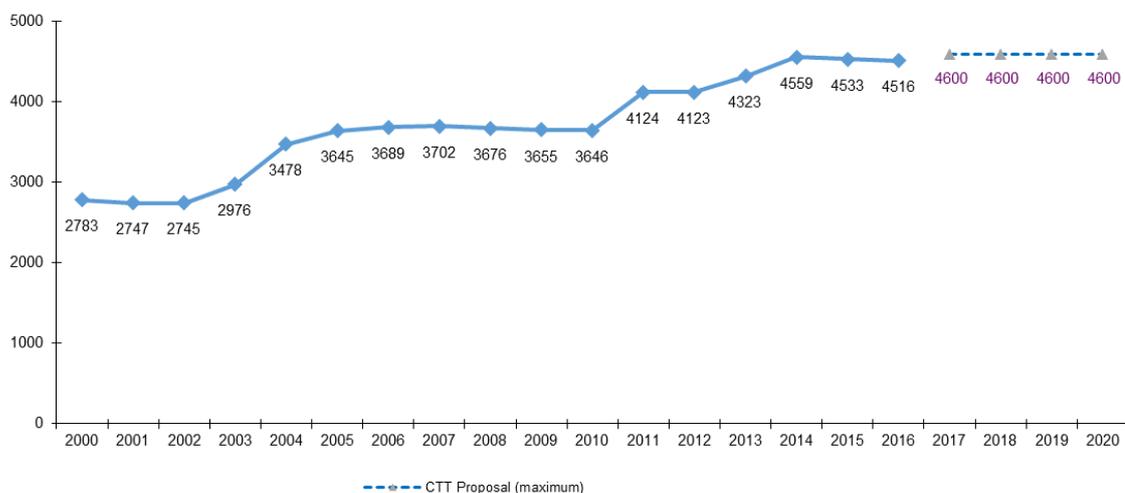
As regards the proposal to maintain the current set of density indicators of postal establishments and respective objectives, ANACOM restates its agreement, set out in its decision of 05.06.2014, as well as the reasons that substantiate it, laid down in the same decision and which are fully reproduced below:

- a) Maintenance of the objective “At national level, the concessionaire shall guarantee that the average number of inhabitants per postal establishment is lower than or equal to 4600 inhabitants.”

CTT’s proposal will allow the density of postal establishments, in the period between 2017 and 2020, to remain at the same level as today.

The value of the objective is constant over the period of time concerned, given that a constant population value is used, corresponding to values from the 2011 Census. By the end of 2016, the (achieved) value of the indicator was 4516 inhabitants per postal establishment, taking into account that 2339 postal establishments existed.

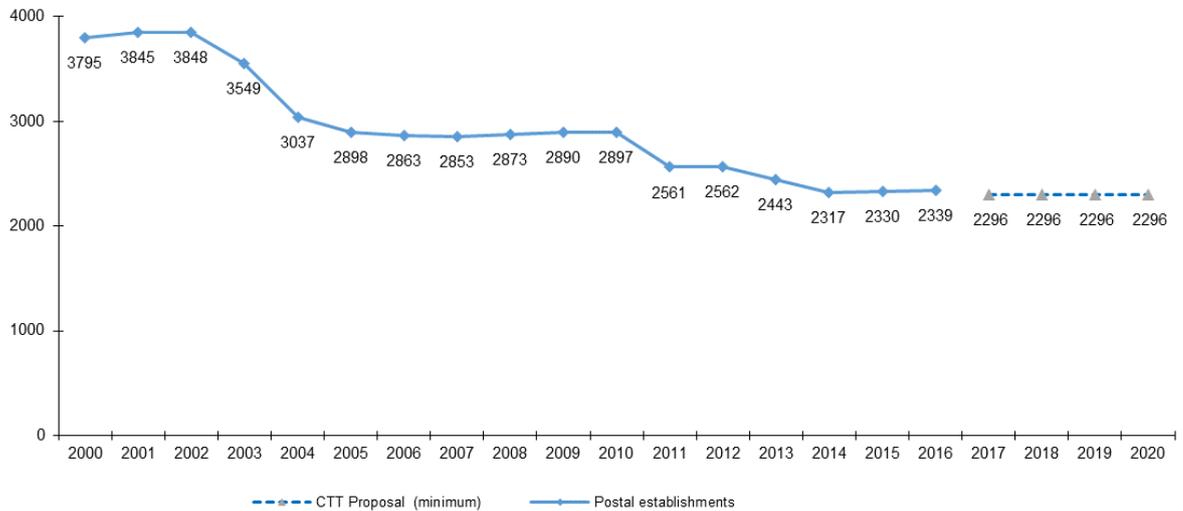
Figure 1 - Average number of inhabitants per postal establishment



Source: Information reported by CTT to ANACOM.

Compared to the situation by the end of 2016 and the objective established, in the period between 2017 and 2020, CTT is flexible to make some adjustments to the number of postal establishments. As such, between 2017 and 2020, the minimum possible number of postal establishments will be 2296, as is the case today.

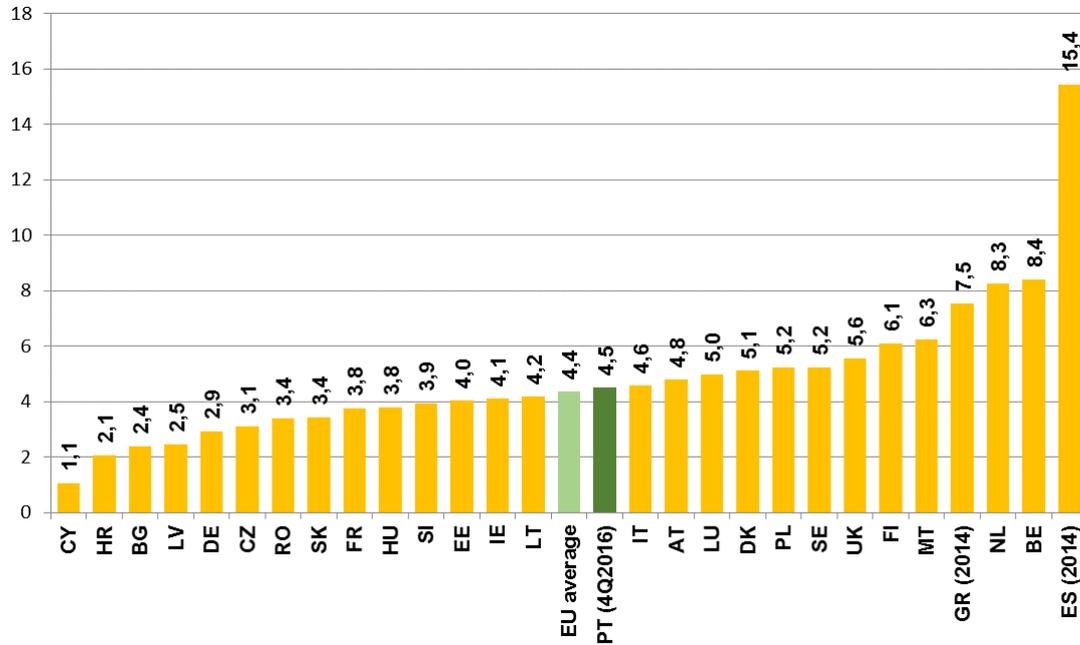
Figure 2 - Evolution in the number of postal establishments (2000-2020) and minimum value underlying CTT's proposal (2017-2020)



Source: Information reported by CTT to ANACOM.

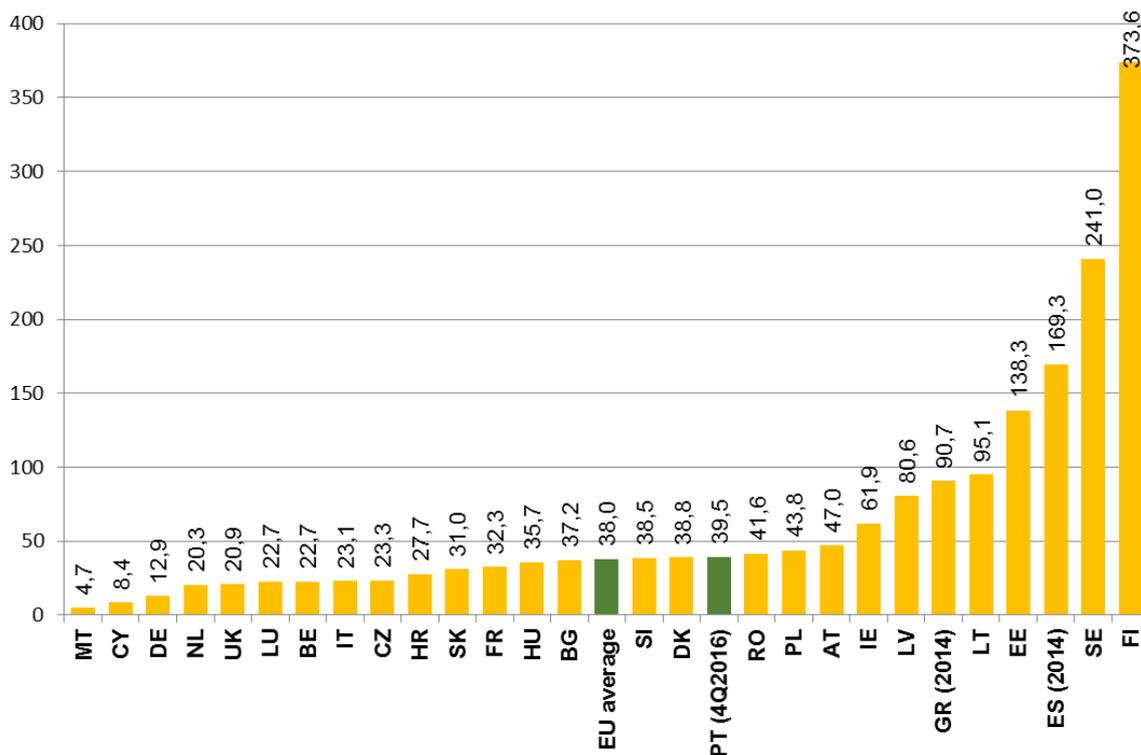
Bearing in mind data provided by the Universal Postal Union (UPU) on the network of fixed postal establishments of universal service providers in Member States of the European Union (EU), for 2015, Portugal compares slightly unfavourably to the EU average, in terms of the number of inhabitants and covered area (in km²) per postal establishment (*vide* figures 3 and 4).

Figure 3 - Density of fixed postal establishments in Member States of the European Union (EU), for 2015 (population, in thousands, per postal establishment)



Source: UPU, except BE (bpost reports & accounts for 2014) and FR (Registration Document 2015 - Annual financial report – La Poste). EU average without Portugal. PT (4Q2016), numbers in brackets refer to the year concerned. The population value taken into consideration refers to 2015.

Figure 4 - Coverage of fixed postal establishments in Member States of EU in 2015 (km² per postal establishment)



Source: UPU, except BE (bpost reports & accounts for 2014) and FR (Registration Document 2015 - Annual financial report – La Poste). EU average without Portugal. PT (4Q2016), numbers in brackets refer to the year concerned. The population value taken into consideration refers to 2015.

According to the Survey on the Use of Postal Services - 2016⁶ (2016 Survey), user satisfaction with the number of postal establishments reached an average of 8.3 in a scale from 1 to 10 (1 - not at all satisfied; 10 - very satisfied).

According to a study on the *needs of users in accessing postal establishments and other points of access to the postal network*, of May 2017, carried out by IMR for ANACOM⁷,

⁶ https://www.anacom.pt/streaming/SPinquerito2016.pdf?contentId=1404153&field=ATTACHED_FILE.

Methodological Note: The universe defined for the survey on the use of postal services is made up of individuals aged 15 years old or older, residing in conventional dwellings as their usual residence, located in Mainland Portugal or the Autonomous Regions (the Azores and Madeira). The sample included 1340 interviews stratified according to NUTII region. Data were collected via computer-assisted telephone interviews (CATI), on the basis of a questionnaire prepared by ANACOM. The fieldwork took place between 2 and 15 November 2016 and was undertaken by Nielsen. The observation unit was the person. Results were recalibrated so as to ensure the social and demographic structure of the Portuguese population aged 15 years old or older, according to results of INE's 2011 Census. The maximum primary level margin of error results of a survey with a random sample of 1340 interviews is +/- 2.7 p.p. for a 95% confidence interval.

⁷ Study available at <https://www.anacom.pt/render.jsp?contentId=1411504>. This study was presented at a workshop held on 14.07.2017, available at <https://www.anacom.pt/render.jsp?contentId=1413480>.

most users (77.5% of residential users and 85.1% of business users) are satisfied with the characteristics of the current postal network and consider (84% of residential users and 81% of business users) that changes in the configuration of the density and characteristics of the current network are not required, rejecting a reduction in the number of post stations or post offices.

The same study also concludes that 77.5% of residential users and 91.4% of business users have used postal establishments and/or other points of access in the last 12 months (predominantly post stations and post offices), and around half of the business customers use at least once every week postal establishments and other points of access, and half of residential customers use them at least once every month, which represents an even more significant use of such facilities.

In the light of the above, this Authority considers that the objective proposed by CTT takes into account user needs.

b) Maintenance of indicators and objectives related to the distance of population to the nearest postal establishment

CTT proposes the maintenance of the three indicators related to the distance of resident population to the nearest postal establishment. Such indicators are as follows:

- *At national level, the concessionaire shall guarantee one point of access within the maximum distance of 6000 meters from the place of residence for 95% of the population.*
- *At the level of urban areas, which include predominantly and moderately urban areas, the concessionaire shall guarantee one point of access within the maximum distance of 4000 meters from the place of residence for 95% of the population.*
- *At the level of rural areas, which include predominantly rural areas, the concessionaire shall guarantee one point of access within the maximum distance of 11 000 meters from the place of residence for 95% of the population.*

As far as these indicators and respective objectives proposed are concerned, and taking also into account:

- Above-mentioned results of the recent study on the needs of users in accessing postal establishments and other points of access to the postal network;
- And that, according to that same study, any increase in the distance to postal establishments would lead to a negative reaction on the part of users⁸,

no reservations are raised by ANACOM. This will enable users in general to maintain, in the period between 2017 and 2020, the same level of accessibility to postal establishments and services that integrate the universal postal service.

Between 2014 and 2016, the value achieved by these indicators presented a positive evolution (*vide* Table 3).

Table 3 - Indicators and objectives related to the distance of population to the nearest postal establishment

	2014	2015	2016
At national level, the concessionaire shall guarantee one point of access within the maximum distance of 6000 meters from the place of residence for 95% of the population	96.7%	96.8%	96.8%
At the level of urban areas, which include predominantly and moderately urban areas, the concessionaire shall guarantee one point of access within the maximum distance of 4000 meters from the place of residence for 95% of the population	95.8%	95.9%	95.9%
At the level of rural areas, which include predominantly rural areas, the concessionaire shall guarantee one point of access within the maximum distance of 11 000 meters from the place of residence for 95% of the population	96.8%	97.0%	97.0%

Source: ANACOM calculations.

According to the referred 2016 Survey, the degree of satisfaction of users (who use postal establishments) with the location of postal establishments reached an average of 8.4 in a scale from 1 to 10 (1 - not at all satisfied; 10 - very satisfied).

⁸ According to this study, an increase by 5km to the current distance to reach the nearest postal establishment by car would lead 70.6% of residential customers and 57% of business customers to react negatively (and to adopt alternative solutions, such as digital solutions, or decrease the current level of correspondence).

As referred earlier, according to the study carried out in 2017 by IMR for ANACOM, 77.5% of residential customers and 85.1% of business customers show a high level of satisfaction as regards points of access to the postal network.

c) Maintenance of indicators and objectives related to more heavily populated areas

CTT proposes to maintain that, in parishes:

- with more than 20 000 inhabitants, the concessionaire is required to ensure at least one postal establishment providing the full range of concessionary services and an additional postal establishment, providing the same range of services, for every additional 20 000 inhabitants;
- with residing population over 10 000 inhabitants and equal to or less than 20 000 inhabitants, the concessionaire is required to ensure the existence of at least one postal establishment providing a full range of concessionary services.

Bearing in mind that this proposal aims to maintain the level of coverage that currently exists in parishes with over 10 000 inhabitants, and in the light of results referred earlier of the study on needs of users in accessing postal establishments and other points of access to the postal network, the objectives proposed by CTT do not raise any reservations.

4.2. Density of letterboxes

Current situation:

The current set of density objectives as far as letterboxes are concerned corresponds to those set out in Table 4.

Table 4. Density objectives of letterboxes

1.	At national level, the concessionaire shall guarantee that the number of inhabitants per geographic point of access to a letterbox is lower than or equal to 1100.
2. a)	In predominantly urban areas, the number of inhabitants per point of access to a letterbox shall be lower than or equal to 1767 inhabitants per letterbox.
2. b)	In moderately urban areas, the number of inhabitants per point of access to a letterbox shall be lower than or equal to 881 inhabitants per letterbox.
2. c)	In predominantly rural areas, the number of inhabitants per point of access to a letterbox shall be lower than or equal to 492 inhabitants per letterbox.
3.	At national level, the minimum percentage of parishes with at least one letterbox shall be 100%

Source: ANACOM decision of 28.08.2014.

[Original] proposal submitted by CTT, on 09.03.2017:

CTT proposed to maintain current density indicators of letterboxes, revising nevertheless the respective objectives of indicators 1 and 2 (described in Table 4), proposing: (i) less stringent objectives for the density of letterboxes at national level and in predominantly urban areas; and (ii) more demanding density objectives in moderately urban and predominantly rural areas.

Furthermore, CTT proposed that, for the purpose of the measurement of indicators, consideration was given to points of access with a minimum nine-hour operating period, between 8 am and 10 pm (so far, consideration is given only to those that operate also for at least nine hours, but between 8 am and 6 pm), claiming that this extension takes into account locations where letterboxes are sat, which present increasingly diversified opening hours.

CTT also proposed the use, for this set of indicators, of the urban typology of parishes as classified by INE in 2014 (TIPAU 2014).

ANACOM Decision of 05.06.2017:

ANACOM agreed with proposals presented by CTT, except for objectives on the density of letterboxes in predominantly urban areas and at national level.

ANACOM took also the view that the objective of ensuring one letterbox per parish, currently in force and which CTT proposes to maintain, should be complemented by the obligation to ensure in every parish at least one point of access to letterboxes for deposit of national standard mail (the service most frequently used by users).

[Revised] proposal submitted by CTT, on 18.07.2017:

Compared with its original proposal, CTT:

- a) Complements the objective of ensuring one letterbox in every parish with the obligation to ensure, also in every parish, at least one point of access to letterboxes for deposit of national standard mail, in line with the referred ANACOM decision of 05.06.2017.
- b) Amends its proposal of objectives of density indicators of letterboxes, to propose the maintenance of objectives currently in force.

As far as this last aspect is concerned, CTT refers that, notwithstanding the recent evolution of postal demand, which in its opinion is characterized by:

- i. “The increasingly low use of letterboxes for deposit of postal items, which may be clearly observed in the scope of sealed mail, which is the type of mail deposited...” in letterboxes;
- ii. “In the period 2013/2016, sealed (and pre-paid) traffic from the occasional segment, which is the main user of letterboxes, fell by around -24.5%, around double the decline of total addressed traffic...”;
- iii. “The relatively low level of use of letterboxes⁹, as referred in ANACOM Decision (page 21/41), according to data from the study [by ANACOM] on needs of users in accessing postal establishments and other points of access to the postal network, dated May 2017”,

the company accepts to maintain the objectives of density indicators of letterboxes currently in force, both at national level and at the level of the various typologies of areas (predominantly urban areas, moderately urban areas and predominantly rural areas).

- c) Maintains remaining elements of the original proposal.

Position taken by ANACOM:

- a) Adoption of the TIPAU 2014 typology of urban areas

As referred earlier, ANACOM agrees with the use of the most recent typology of urban areas defined by INE, which corresponds to the so-called TIPAU 2014.

For information purposes, Table 5 presents values which would be achieved by the end of 2016 by applying the TIPAU 2014 typology to the calculation of indicators related to the average number of inhabitants per letterbox, according to the type of area, and it must be referred that values achieved would have met density objectives applicable by the end of 2016.

⁹ “Around 7% of residential users and 12% of business users (micro, small and medium-sized companies), of total customers that used the postal network over the last 12 months, refer they used letterboxes, a value which reaches 17.5% in the case of small companies”.

Table 5 - Average number of inhabitants per letterbox (geographic point) - end of 2016

	Values achieved by the end of 2016 using the currently applicable area typology	Values which would have been achieved by the end of 2016 using the TIPAU 2014 typology	Density objective in force
PUA	1638	1628	≤ 1767
MUA	834	801	≤ 881
PRA	458	461	≤ 492

Source: ANACOM calculations, taking into account the letterbox network by the end of 2016.

PUA – predominantly urban area; MUA – moderately urban area; PRA – predominantly rural area.

b) Letterboxes to be considered

CTT maintains its proposal that, to measure indicators related to the density of letterboxes, consideration is given only to points [of access] with minimum nine-hour operating period, between 8 am and 10 pm.

ANACOM raises no issues as regards this proposal, as expressed already in its decision of 05.06.2017, stressing that this will allow points of access to letterboxes that are already accessible to users, or which could be in the future, for a minimum daily period of 9 hours (for example from 1 pm to 10 pm), and which today are not considered to be relevant for the purpose of indicators, to be taken into account.

c) Density indicators of letterboxes and respective objective values

CTT proposes to maintain current density indicators of letterboxes, as well as the respective objective values.

Figure 5 shows the minimum value for letterboxes to be met between 01.10.2017 and 30.09.2020, as results from CTT's current proposal.

Figure 5 - Evolution in the number of letterboxes (geographic point): up to 2016 (actual); 2017-2020 (minimum value resulting from CTT's proposal)



Source: Information reported by CTT and ANACOM calculations.

As regards the justification presented, CTT itself estimated that sealed traffic from the occasional segment fell by around -24.5% in the period 2013-2016¹⁰.

As regards the use of letterboxes, according to the referred 2016 Survey, published by ANACOM in January 2017, of all residential users that used at least one mail service in the last 12 months, 18.4% declared they deposited postal items in letterboxes (vide Table 6).

¹⁰ Taking into consideration the most recent data on the evolution of traffic of standard, priority and easy mail services, in the period 2013-2016, for the occasional segment (CTT estimates for 2013, reported to ANACOM in the scope of the price proposal for 2014; data of the cost accounting system of CTT for 2016, received by the end of June 2017).

Table 6 - Locations available for the deposit of letters by residential users

	% of respondents*
Yes, at post stations/offices only	81.2
Yes, both at letterboxes on the public highway and at post stations/offices	15.9
Yes, at letterboxes on the public highway only	2.5
Do not know/ Do not answer	0.3
Mailman	0
Elsewhere	0

* Responses to the question: When sending your mail (standard, priority and easy mail) did you deposit it at letterboxes on the public highway or at post stations/offices?

Source: Survey 2016

According to the study on the *needs of users in accessing postal establishments and other points of access to the postal network*, of May 2017, around 7% of residential users and 12% of business users (micro, small and medium-sized companies) of total customers that used the postal network over the last 12 months refer they used letterboxes, a value which reaches 17.5% in the case of small companies. Although these are not significant values (when compared to the use of postal establishments), it must be stressed that, according to the same study, among users that refer they use letterboxes, 42.2% of residential users and 90.5% of business users refer they use them at least once every month¹¹.

According to the same study, letterboxes are more used in urban areas:

- Letterboxes are used by 9% of residential users in predominantly urban areas who used the network in the last 12 months, 5.1% in predominantly rural areas and 3.4% in moderately urban areas; by 13.2% of companies located in predominantly urban areas, 7.1% in moderately urban areas and 6.7% in predominantly rural areas;
- Letterboxes located outside post stations are used by 7.5% of residential users in predominantly urban areas, 3.9% in moderately urban areas and 3.3% in predominantly rural areas; by 13.2% of companies located in predominantly urban areas, 7.1% in moderately urban areas and 6.7% in predominantly rural areas.

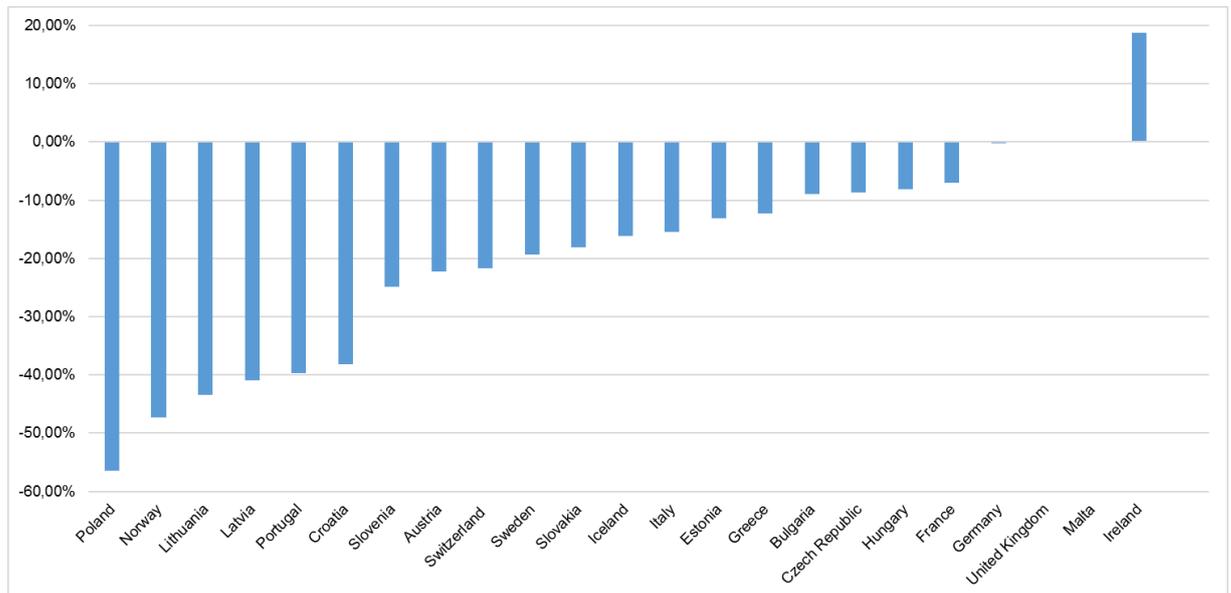
Still according to the same study, it takes longer, in average, to reach a letterbox in rural areas and moderately urban areas than in urban areas.

¹¹ And 59.6% of business users refer they use them at least once a week.

As such, in the light of the above, CTT’s proposal to maintain the objective values of density of points of access to letterboxes contributes to maintain the level of accessibility to those points of access and, thus, the current levels of quality of the service provided, and it is deemed that CTT’s proposal meets user interests, in a context of decrease of mail traffic, and taking into account that the rate of residential and business users that use letterboxes is not significant. Notwithstanding, it is relevant that those who use letterboxes do so frequently, especially business users (as evidenced above).

It should be stressed that Portugal is one of the countries of the EU with the highest degree of reduction in the number of letterboxes (comparing 2015 to 2008, the number of letterboxes decreased by 39.6% - *vide* Figure 6), this trend having been interrupted and inverted in 2014, with the definition of the density objectives currently in force. Even so, Portugal compares unfavourably with the average of countries analysed¹² (*vide* Figure 7).

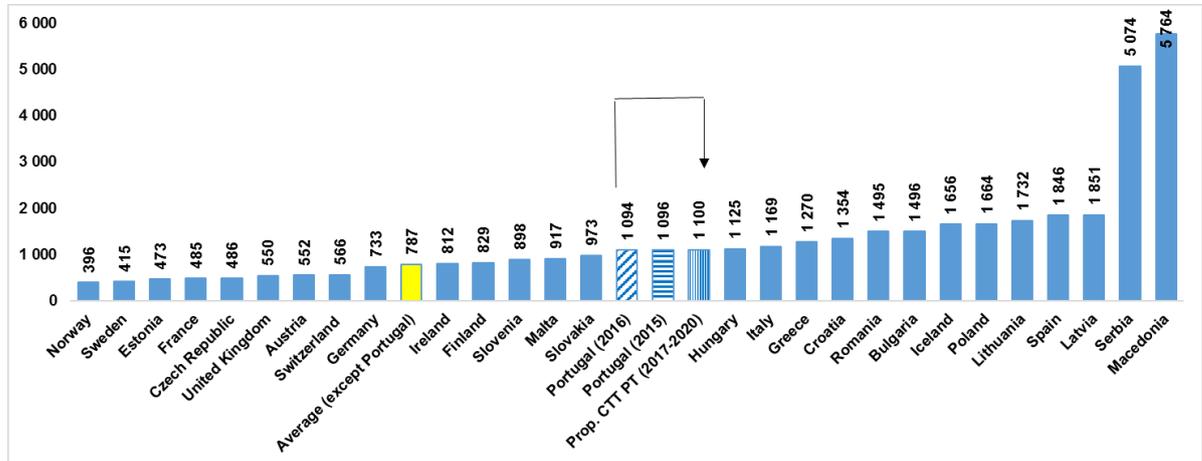
Figure 6 - Variation in the number of letterboxes between 2008 and 2015



Source: Data from the European Regulators Group for Postal Services.

¹² Average without Portugal.

Figure 7 - Number of inhabitants per letterbox



Source: Data from the European Regulators Group for Postal Services (for 2015) and ANACOM calculations for Portugal (for 2016 and period between 2017-2020).

The reality of each country analysed also reflects obligations in terms of access to letterboxes defined in each country. **Annex 1** presents a compilation of the various obligations, as regards the density both of letterboxes and of postal establishments and opening hours.

d) Letterboxes per parish

As referred earlier, CTT proposes to maintain the objective of ensuring one letterbox in every parish, complementing it with the obligation to ensure in every parish at least one point of access to letterboxes for deposit of national standard mail.

This proposal meets ANACOM decision of 05.06.2017, and contributes to the accessibility of users to postal services.

4.3. Minimum services provided

Current situation

Objectives currently in force as far as minimum services provided are concerned are presented in Table 7.

Table 7. Objectives of minimum services provided

1.	Provision of a post service for the blind.
2.	Provision of the full range of concessionary services by at least one postal establishment in every municipality.
3.	The percentage of postal establishments providing the full range of concessionary services intended for the occasional segment*, in the total of postal establishments, shall be at least 75%.
4. a)	The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment* shall be 8500 meters for 97.5% of the population, at national level.
4. b)	The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment* shall be 5500 meters for 97.5% of the population, at the level of urban areas.
4. c)	The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment* shall be 15 000 meters for 97.5% of the population, at the level of rural areas.
5.	The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment* shall be 30 000 meters at the most, for the whole of the population.
6.	In rural areas, for population residing more than 10 000 meters away from nearest postal establishment, postmen shall also perform itinerant customer service operations, which specifically include sale of stamps and prepaid envelopes, acceptance of non-registered mail, acceptance of registered mail, home payment of postal orders.
7.	The percentage of postal establishments providing the legal summons and notifications service compared to all establishments shall be at least 50%.
8. a)	The number of postal establishments opened to the public less than 5 days and/or 15 hours a week shall not exceed 1.5% of all postal establishments.
8. b)	The number of postal establishments opened to the public less than 5 days and/or 15 hours a week shall not exceed 20% of postal establishments in each municipality.

* Postal establishments providing the full range of concessionary services intended for the occasional segment mean postal establishments providing the basket of services generally used by the occasional segment of users, which includes the following services: standard mail, priority mail, easy mail, registered mail, insured mail, books and parcels, postal orders (issue and payment) and collections.

Source: ANACOM Decision of 28.08.2014.

[Original] proposal submitted by CTT, on 09.03.2017:

CTT proposed to:

- a) Revise (both) indicators of limited/ shorter opening hours (*vide* indicators 8a and 8b in Table 7), taking into account, according to CTT, the increasing difficulties in installing these postal establishments in villages;
- b) Maintain remaining indicators and respective objectives.

CTT specifically proposed the following changes to indicators of shorter opening hours:

“By virtue of the existence of shorter opening hours in some post offices operating in villages, which cannot operate at an alternative location, the operation of postal establishments for shorter opening hours shall be admitted. In this respect, the following is defined:

- a) The number of postal establishments opened to the public less than 5 days and ~~for~~ 15 hours a week must not exceed 1.5% of all postal establishments;
- b) The number of postal establishments opened to the public less than 5 days and ~~for~~ 15 hours a week **mustshall not** exceed 20% of postal establishments ~~inof~~ each municipality **or one postal establishment in the case of municipalities with less than five establishments.”**

It is highlighted that this proposal requires two conditions to be met simultaneously so that a postal establishment is considered to operate for shorter opening hours:

- a) opening to the public for less than 5 working days; **and**
- b) opening for less than 15 hours a week.

According to the current wording of this indicator, it is enough that one of the above-mentioned conditions is met so that a postal establishment is deemed to operate for shorter opening hours, thus making the current indicator more demanding than the one resulting from CTT’s proposal.

CTT also proposed the change of the methodology for assessing the urban typology of parishes, to take TIPAU 2014 into consideration. As referred above, this was accepted by ANACOM, reason for which this issue will not be referred again in the scope of this specific point.

ANACOM Decision of 05.06.2017:

ANACOM considered that the proposal submitted by CTT for indicators of shorter opening hours did not guarantee accessibility and quality in the provision of the universal postal service, failing also to take user needs into due account.

ANACOM took the view that CTT’s proposal should be revised, so as to:

- a) consider that a postal establishment will only be deemed not¹³ to operate for shorter opening hours where it observes, simultaneously, a criterion of opening all working days of the week (or in the alternative, at least five calendar week days¹⁴) and a criterion of minimum number of opening hours on each of those days, to make up a minimum number of opening hours a week; and
- b) maintain at the same time a maximum objective value for the set of situations of postal establishments considered to operate for shorter opening hours, so as not to imply a deterioration of current conditions of accessibility.

As regards the limitation of postal establishments operating for shorter opening hours per municipality, ANACOM considered that CTT's proposal would allow, in municipalities where a single postal establishment exists, that it operated for shorter opening hours, a situation which in the opinion of this Authority does not ensure, in such municipalities, the availability and accessibility required for the provision of the universal service, in view of the limited period of time available to access that service.

As such, this Authority took the view that:

- a) CTT's proposal should be revised, so as to safeguard, in municipalities where a single postal establishment exists, that it does not operate for shorter opening hours;
- b) Furthermore, it would contribute to a better accessibility to the universal service and would better fulfil user needs if in all municipalities, in addition to the requirement for a postal establishment providing the full range of concessionary services (an objective which is currently in force and which CTT proposed to maintain), this postal establishment operated (at least) all working days of the week for a minimum of six hours a day.

¹³ By mistake, ANACOM's decision states the opposite, that is, that a postal establishment will only be considered to have shorter opening hours where it observes the referred criteria, which is a manifest error, as may easily be inferred from the arguments presented in the decision.

¹⁴ For example, the current wording of indicators of opening hours of postal establishments would enable the classification as postal establishments with shorter operating hours, establishments that operate for more than 3 hours a day throughout the week for 5 or more calendar days a week, in case they close at least one working day (which is the case of post offices of Ponte Nova and Gulpilhares).

With regard to CTT's proposal to maintain remaining indicators and objectives of minimum services provided, ANACOM deems that this would ensure the availability and accessibility of services that integrate the universal postal service.

[Revised] proposal submitted by CTT, on 18.07.2017:

In this respect, CTT:

- a) Presents a new revised proposal for indicators of shorter opening hours for post offices (indicators 8a and 8b);
- b) Continues to propose the maintenance of remaining indicators and respective objectives.

CTT's proposal, as regards indicators of shorter opening hours, is as follows:

"By virtue of the existence of shorter opening hours in some post offices operating in villages, which cannot operate at an alternative location, the operation of postal establishments for shorter opening hours shall be admitted.

Postal establishments operating for shorter opening hours shall be deemed to be those opened to the public less than 5 working days or 15 hours a week, excluding those opened to the public for a period of at least 5 calendar days and 20 hours a week or more.

In this respect, the following is defined:

- a) The number of postal establishments with **shorter opening hours** ~~opened to the public less than 5 days and/or 15 hours a week~~ must not exceed 1.5% of all postal establishments;
- b) The number of postal establishments with **shorter opening hours** ~~opened to the public less than 5 days and/or 15 hours a week~~ shall not exceed 20% of postal establishments ~~in~~of each municipality **or one postal establishment in the case of municipalities with less than five establishments. In the case of municipalities where a single postal establishment exists, it shall not operate for shorter**

opening hours and shall open every working day, with a minimum 15-hour weekly operating period”.

Position taken by ANACOM:

In line with ANACOM’s position, expressed in the decision of 05.06.2017, CTT amended its proposal on establishments with shorter opening hours, so as to consider that a postal establishment will not be deemed one where it fulfils, simultaneously:

- a) A criterion of opening on a minimum number of working days, or calendar days, of the week;
- b) A criterion of minimum number of opening hours a week.

As such, CTT proposes to maintain current criteria of minimum opening hours in five working days a week and 15 opening hours a week.

CTT also proposes that postal establishments that are not opened every working day of the week, but which are opened on weekends, may also not be considered as operating for shorter hours, insofar as they are opened 5 calendar days and for at least twenty hours a week, given, according to CTT, the convenience and proximity services provided to the population, which allow greater accessibility to postal services.

This revised proposal submitted by CTT is in line with ANACOM’s perspective, as it allows the identification of postal establishments operating for shorter hours to take into consideration the accessibility to postal services on weekends, given the convenience of this access to groups of users, namely residential users, who on working days may have greater difficulties in accessing postal services by virtue of being at work.

However, CTT fails to define a minimum number of opening hours on each day of the week (either working days or weekends) for postal establishments considered not to operate for shorter hours.

CTT takes the view that, for a postal establishment to be considered not to operate for shorter hours, it is enough to define a criterion of operation in terms of the minimum number of days and hours of weekly operation, given that:

- a) This criterion already guarantees a smooth functioning of the postal establishment according to local needs, as well as the accessibility to postal services;
- b) In view of constrains related to the installation of post offices in villages, the introduction of a minimum number of hours of daily operation would introduce severe limitations to the functioning of these postal establishments, without any benefits to the population in terms of accessibility and quality in the provision of the service, as this could lead to situations where the establishment better equipped for the provision of the postal service would be disregarded for not complying on an operating day with the specific minimum hours of operation or where a postal establishment would not open in a specific location due to the fact that the single establishment prepared for this purpose would not be able to achieve the minimum number of hours on a weekday.

It must be clarified that it was not ANACOM's intention to define a minimum daily operating period that resulted in the need to increase current opening hours of postal establishments considered to operate for shorter hours.

ANACOM seeks to guarantee, as CTT also refers, the minimum regular operation of postal establishments, to allow access thereto by users throughout the week.

In this context, it is deemed that CTT's proposal as regards (weekly) operating periods of postal establishments with shorter hours, together with the maintenance of the limit of possible situations of shorter hours at national level¹⁵, continues to guarantee the access of both business and residential users to postal establishments throughout the week.

As regards the limit of postal establishments with shorter opening hours per municipality, CTT's proposal is in line with ANACOM's perspective, that is:

- a) The number of postal establishments operating for shorter hours does not exceed 20% of establishments in every municipality or one postal establishment in the case of municipalities with less than five establishments;
- b) In municipalities where only a single postal establishment exists, it must not operate for shorter hours.

¹⁵ It is stressed, as referred earlier, that ANACOM's intention, as expressed in its decision of 05.06.2017, was to maintain the maximum objective value for the set of situations of postal establishments considered to operate for shorter hours, without involving the deterioration of current conditions of accessibility.

As referred above, in its decision of 05.06.2017 ANACOM considered that it would contribute to a better accessibility to the universal service and would better fulfil user needs if in all municipalities, in addition to the requirement for a postal establishment providing the full range of concessionary services (an objective which CTT proposed to maintain), this postal establishment operated (at least) all working days of the week for a minimum number of hours a day, of six hours or more.

As far as this objective is concerned, CTT proposes that the postal establishment concerned operates every working day, with a minimum 15-hour weekly operating period.

CTT informed that there are currently 63 municipalities where a single postal establishment exists providing all concessionary services, out of which only one post station (store), in the island of Corvo, operates less than 6 hours a day (it operates 3h30m a day). Their opening hours have been operational since November 2010, taking into account the respective activity and the average daily demand of the post station, factors which, according to CTT, are also taken into account in the definition of opening hours of other postal establishments.

CTT believes that, given that opening hours are defined to better meet postal needs of the population taking into account the respective local demand, the safeguard proposed, according to which in municipalities where only a single postal establishment exists, it shall not operate for shorter hours, is enough to ensure the availability and accessibility of the universal service in these municipalities.

Bearing in mind:

- a) That the objective intended by ANACOM with the definition of a minimum period of daily operation, for a postal establishment per municipality providing all concessionary services, is to ensure the accessibility of users (residential and business¹⁶) to concessionary services in all working days of the week, in every municipality;
- b) That shorter operating hours imply, *ceteris paribus*, a lower degree of accessibility;
- c) That the proposal presented by CTT safeguards access for a minimum period a week to postal establishments that are the sole available establishments in the municipality where they are located (which, on account of being the sole available establishments,

¹⁶ Who, according to the above-mentioned study on the needs of users in accessing postal establishments, are the main users of postal establishments.

are required to provide all concessionary services), but fails to guarantee, however, in remaining municipalities where more than one postal establishment exists, a minimum period of access to at least one postal establishment providing all concessionary services;

- d) That it is deemed appropriate to safeguard a minimum period of access every day, all working days of the week, to at least one postal establishment providing in each municipality all concessionary services, regardless of whether in that municipality there is only one or more postal establishments, a guarantee that does not exist today in current objectives of postal network density and minimum services provided;
- e) That according to the study on the needs of users in accessing postal establishments and other points of access to the postal network, of May 2017, in addition to proximity, opening hours of postal establishments is one of the main criteria valued by (residential and business) users when choosing which postal establishment to use. The same study concludes also that most (residential and business) users are satisfied with the characteristics of the current postal network, and that there is strong resistance to its degradation [around only 20% of - residential and business - users could accept the reduction of opening hours of postal establishments (to operate exclusively in the morning or in the afternoon)];
- f) The 2016 Survey also shows that opening hours is one of the most important aspects in the scope of the general quality of the postal service provided¹⁷, such users being satisfied with opening hours¹⁸;
- g) That, according to available data for the end of March 2017, there are only two municipalities in the country that fail to have at least one postal establishment providing all concessionary services, with a daily operating period of less than 6 hours, one of which is referred by CTT, in the island of Corvo,

ANACOM considers that, as a safeguard measure and in order to guarantee the regular accessibility of concessionary services provided in each municipality, in addition to the requirement for (at least) one postal establishment providing the full range of concessionary

¹⁷ Having been given a level of relevance over 9.2 points, in a scale from 1 (not at all relevant) to 10 (very relevant).

¹⁸ Having been given a level of satisfaction over 8.4 points, in a scale from 1 (not at all relevant) to 10 (very relevant).

services (an objective which is currently in force and which CTT proposed to maintain), that postal establishment is required to operate all working days of the week for a minimum of six hours a day, which corresponds to a minimum of 30 hours a week.

Nevertheless, ANACOM deems that specific situations where the operating period of postal establishments is at the moment already lower than that 6-hour period must be taken into account.

In the light of the above, ANACOM takes the view that indicators 8b) and 2 of CTT's proposal must be amended to read as follows:

"2. In every municipality, at least one postal establishment shall provide the full range of concessionary services, operating:

- a) 99% of the cases, all working days for a minimum daily period of 6 hours;
- b) In remaining cases, all working days for a minimum daily period of 3 hours."

"8. By virtue of the existence of shorter opening hours in some post offices operating in villages, which cannot operate at an alternative location, the operation of postal establishments for shorter opening hours shall be admitted.

Postal establishments operating for shorter opening hours shall be deemed to be those opened to the public less than 5 working days or 15 hours a week, excluding those opened to the public for a period of at least 5 calendar days and 20 hours a week or more.

In this respect, the following is defined:

- a) At national level, the number of postal establishments operating for shorter opening hours shall not exceed 1.5% of all postal establishments;
- b) In each municipality, the number of postal establishments operating for shorter opening hours shall not exceed 20% of postal establishments of each municipality or one postal establishment in the case of municipalities with less than five establishments."

ANACOM agrees with the maintenance of remaining indicators of minimum services provided (indicators 1, 3, 4, 5, 6 and 7 - *vide* Table 7 above), as well as with the respective objective values, taking into consideration that, according to the study on the needs of users in accessing postal establishments and other points of access to the postal network, of May

2017, most (residential and business) users are satisfied with the characteristics of the postal network, this Authority taking the view that such indicators and objectives contribute to ensure the availability and accessibility to services that integrate the universal postal service.

5. Reporting to ANACOM

As far as the data reporting duty is concerned, CTT's proposal abides today by ANACOM's determinations and suggestions, established in the referred decision of 05.06.2017, so that the quarterly report includes:

- a) Assignment to each letterbox of an unambiguous code associated to the respective point of access;
- b) Dates when changes made by CTT to the pool of letterboxes take effect.

ANACOM proposes mere editorial amendments to the draft text presented by CTT, so as to break down data reported on letterboxes and on postal establishments, for the sake of clarity.

Moreover, CTT proposes to report, together with the geographic location coordinates of postal establishments and letterboxes, the indication of the degree of accurateness of such geographic coordinates, "where appropriate", failing however to indicate the situations deemed to be appropriate.

The reporting of such data, which CTT already undertakes today, is considered by ANACOM to be beneficial, thus it must take place at all times and not "where appropriate".

6. Determination

Taking into consideration:

- a) The proposal for objectives of postal network density and minimum services provided, presented by CTT on 18.07.2017, under paragraph 5 of base XV of the Universal Postal Service Concession;
- b) The analysis of the referred proposal, undertaken in the preceding chapters;
- c) That by determination of 27.07.2017, the Management Board of ANACOM approved a Draft Decision on the referred objectives of postal network density and minimum

services provided, which was submitted to the prior hearing of CTT (pursuant to paragraph 6 of base XV of the Concession and articles 121 *et seq.* of the Administrative Procedure Code) and to the consultation of users (under the referred paragraph 6 of base XV of the Concession);

- d) Contributions received in the scope of the referred prior hearing and user consultation procedures, the analysis of which is laid down in the “Report of the prior hearing of CTT and consultation of users on the Draft Decision on the objectives of postal network density and minimum services provided”,

the Management Board of ANACOM, in the exercise of powers provided for in paragraph 1 h) and i) of article 8 of its Statutes, approved by Decree-Law No. 39/2015, of 16 March, as well as in paragraph 1 a), f) and o) of article 9 of the same Statutes, and in 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 article 2 of the referred Law and under paragraph 6 of base XV of the Bases of the Universal Postal Service Concession, 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:

1. To approve the “Report of the prior hearing of CTT and consultation of users on the Draft Decision on the objectives of postal network density and minimum services provided”, which is an integral part of this decision;
2. That objectives and rules of postal network density and minimum services provided, presented by CTT by letter of 18.07.2017, under the terms and for the purpose of paragraph 5 of base XV of the Universal Postal Service Concession, still fail to fully meet user needs under the current legal framework, as far as indicators and objectives of opening hours of postal establishments are concerned;
3. To set objectives and rules of postal network density and minimum services provided, in **Annex 2** hereto.

Annex 1 - 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 provider¹⁹.

Postal establishments²⁰:

Country	Criterion
Austria	The minimum number of postal establishments is 1650. In locations with more than 10 000 inhabitants, and in all district capitals, postal establishment must be 2000 meters away at the most. In all other areas, postal establishments must be 10 000 meters away at the most.
Belgium	The minimum number of postal establishments is 1300, 650 of which must be post stations. There must be at least one post station in each municipality. At least 95% of the population must be 5000 meters away (by road) at the most from a postal establishment providing basic services and 98% of population must be 10 000 meters away (by road) of a postal establishment providing the basic services.
Bulgaria	One postal establishment in each locality with more than 800 inhabitants. In localities with less than 800 inhabitants, postal establishments may close or relocate, the National Regulatory Authority being notified thereof, as well as of means to ensure the provision of the universal postal service.
Cyprus	The Regulatory Authority guarantees that the density of postal establishments meets user needs.
Czech Rep.	Minimum of 3200 postal establishments. Establishments must be located: (i) in every municipality with more than 2500 inhabitants; (ii) in every municipality with less 2500 inhabitants, where there are schools with at least nine years of schooling, or municipal buildings with administrative authority or which are register-related (births, deaths); (iii) 10 000 meters away at the most by road of any point in the territory; (iv) 2000 meters away at the most in a straight line from each residential point in municipalities with more than 2500 inhabitants.
Estonia	One postal establishment per city and per parish. In cities with more than 20 000 inhabitants, an additional postal establishment is required for every 20 000 inhabitants. In every parish with more than 2500 inhabitants, an additional postal establishment is required. In rural areas, where the user is

¹⁹ In Sweden and Luxembourg, the law lays down that the density of points of access and contact must take into account user needs, and in the case of Luxembourg the geographic distribution is subject to the prior approval of a plan by the Regulatory Authority.

²⁰ Ireland: Not defined.

more than 5000 meters away from the nearest postal establishment, the USP is required to provide home services at no additional charge.

Finland	One postal establishment per municipality. 82% of the population must be 3 km at the most from the nearest postal establishment. The maximum distance to a postal establishment may only exceed 10 km for 3% of the population. Points of access must be located so that they are at reasonable distance from users.
Germany	There must be at least 12 000 fixed postal establishments. In each municipality with more than 2000 inhabitants one postal establishment is required and in each “administrative district” there must be at least one postal establishment per 80 Km ² . In urban areas with more than 4000 inhabitants, a postal establishment must be 2000 meters away at the most in a straight line.
Croatia	One postal establishment per 80 Km ² or 6000 inhabitants. The network of postal establishments must include at least 700 post stations. In residential areas, the maximum distance between points of access (including postal establishment, letterboxes, sorting offices, etc.) is 5000 meters.
Latvia	In cities - one postal establishment per every 20 000 inhabitants. In rural areas - 1 postal establishment per parish.
Lithuania	In rural residential areas, there must be at least one fixed postal establishment in localities with greater degree of ageing. In urban areas, there must be at least one postal establishment 3 km away at the most from users.
Malta	The USP must guarantee at least 59 postal establishments providing basic services. The USP must provide basic services in each locality of Malta and Gozo and as close as possible of locality centres.
The Netherlands	The distribution of postal establishments must result in a point of access: (i) providing a full range of services, at 5000 meters away at the most for 95% of the population; (ii) providing a full range of services outside residential areas with more than 5000 inhabitants, for at least 85% of residents.
Poland	A permanent point of access: (i) for every 6000 inhabitants in urban and urban-rural areas; (ii) per 85 km ² in rural areas; (iii) for every “community”; (iv) the location of points of access must take demand into account in a given area.
Romania	At least one postal establishment is required per locality.
Serbia	1400 postal establishments. In localities between 3000 and 12 000 families, the USP must establish one postal establishment per every 3000 families, where the distance to another postal establishment exceeds 2 km. In localities between 12 000 and 36 000 families, one postal establishment per every 4000 families is required, where the distance exceeds 1.5 km. In localities between 36 000 and 100 000 families, one postal establishment is required per every 6000 families, where the distance exceeds 1.25 km. In

localities with more than 100 000 families, one postal establishment per every 7500 is required, where the distance exceeds 1 km.

Slovenia	The universal postal service provider must guarantee one postal establishment per municipality. 95% of the population must be 4.5 km away from the nearest post station, in a straight line.
Slovakia	One postal establishment in every residential area with: (i) more than 2500 inhabitants, (ii) less than 2500 inhabitants where the sub-region has more than 3500 inhabitants. In areas with more than 20 000 inhabitants, one postal establishment is guaranteed for each 20 000 inhabitants. Each locality with less than 25 inhabitants must not be more than 10 km away from the nearest postal establishment.
United Kingdom	The distribution of postal establishments must be such that: (i) 95% of the population is, at the most, 5 km away from the nearest postal establishment; (ii) in all post code areas, 95% of the population is 10 km away at the most from the nearest postal establishment.

Source: Questionnaire submitted by ANACOM to ERGP.

Opening hours and services provided:

Country	Criterion
Austria	<p>Postal establishments operate on a daily basis at least 5 working days a week and do not operate less than 20 hours a week, except for postal establishments managed by municipalities, which are required to operate at least 15 hours a week and three working days a week.</p> <p>Post offices are allowed, and may operate for shorter hours and not provide all relevant services. The maximum number of post offices may not exceed 165.</p>
Belgium	<p>The USP is required to provide basic services in all post offices, and the full range of services in post stations.</p> <p>Post stations must operate some hours a week beyond regular opening hours (at the end of the day or on weekends). There are also some obligations regarding users with some type of physical handicap and obligations on waiting times and interaction with customers.</p>
Croatia	The USP must ensure: (i) extended opening hours (7 am - 12 am) all week days, at one of the postal establishments of the Croatian capital; (ii) as a rule, opening hours between 8 am - 8 pm in the cities; (iii) in other postal establishments, postal establishments may operate continuously (ex. 8 am - 3

pm or 10 am - 5 pm); with several operating periods throughout the day (ex: 8 am - 12 pm or 4 pm-7 pm); or with shorter hours (ex. 8 am - 12 pm).

Cyprus Uninterrupted and continuous provision of services for at least 5 days a week.

Estonia Postal establishments must operate 5 days a week, for at least 2 hours a day between 8 am and 6 pm.

Latvia Postal establishments must operate at least 5 days a week.

Lithuania Postal establishments must operate all working days and not less than 5 days a week.

Malta The basic services provided at postal establishments include: (i) sale of stamps, (ii) acceptance and collection of bulk mail, (iii) mail sending including packages, (iv) services for registered items and insured items, and (v) any other services the provision of which is considered by the Regulatory Authority to be appropriate, insofar as the USP is consulted.

Postal establishments are required to operate between 7:30 am and 1 pm from Monday to Saturday, "main" postal establishments being required to operate between 8 am and 8 pm. "Postal sub-establishments" are required to operate between 7 am and 12 pm and from 4 pm to 5 pm from Monday to Friday and from 7 am and 12 pm on Saturdays.

Where the USP intends to change opening hours or days of operation, it is required to submit a request to the Regulatory Authority 20 days in advance of the date when the implementation is proposed to take effect. The communication must be duly justified. After reception of this request, the Regulatory Authority must issue a decision within 5 working days, informing the USP thereof and publishing its decision at its website.

Serbia The universal service provider is required to ensure the collection of postal items at post stations during the day, every working day, not less than five days a 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 is entitled also to designate which postal stations open on Saturdays, Sundays and holidays.

Permanent post stations must operate at least 2 (two) hours a day.

Slovakia The following requirements have been defined for post stations operating in residential units:

- Less than 3000 inhabitants, or in a sub-region area with less than 5000 inhabitants: on working days, the station must open in the morning and/or afternoon for not less than 3 hours per working day. It must operate at least once a week in the afternoon, or at least once a week up to 5 pm;
- 3001 to 5000 inhabitants: opening hours on working days run, at least, from 8:30 am to 3 pm, including technological and operational interruptions or lunch breaks and at least one working day up to 5 pm;

- 5001 to 10 000 inhabitants: opening hours on working days run from 8:30 am to 4 pm, including technological and operational interruptions or lunch breaks, and at least one working day up to 5 pm;
- 10 001 to 50 000 inhabitants: opening hours on working days run from 8 am to 5 pm;
- More than 50 000 inhabitants: opening hours on working days run from 8 am to 6 pm; some post stations open at 7 am.

Slovenia Five working days, for at least two consecutive hours.

Source: Questionnaire submitted by ANACOM to ERGP

Letterboxes:

Country	Criterion
Austria	In populated residential areas, letterboxes must be 1km away at the most.
Belgium	There must be at least one letterbox per municipality. The last collection must take place before 5 pm, or before 7 pm, in municipalities where this is justified.
Bulgaria	In localities: (i) up to 2000 inhabitants, at least one letterbox is required, (ii) between 2000 and 10 000 one letterbox for every 2000 inhabitants is required; (iii) between 10 000 and 50 000 inhabitants, one letterbox for every 3000 inhabitants; (iv) where more than 50 000 inhabitants exist, one letterbox for every 5000 inhabitants is required.
Cyprus	The universal postal service provider 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.
Czech Rep.	In municipalities with less than 10 000 inhabitants, one letterbox is required for every 1000 inhabitants. In municipalities with more than 10 000 inhabitants, one letterbox is required 1 km away at the most. Letterboxes must be placed at locations attended by inhabitants (shopping centres, public transport stops, etc.).
Estonia	All cities or parishes must be provided with at least two letterboxes. The minimum distance is 0.5 km in cities, and 2 km in smaller towns.
Germany	As a rule, users in urban areas must not be more than 1 km away from a letterbox, in a straight line.
Croatia	The USP must ensure the number and distribution of letterboxes so as to guarantee accessibility in terms of time and location, in places where no other network point is available.
Ireland	The sitting of letterboxes at 1 km away at the most in cities and 3 km away at the most in rural areas is required.

Latvia	One letterbox per 3000 inhabitants, in cities, and one letterbox per 2000 inhabitants in rural areas.
Lithuania	In urban areas, letterboxes must be 2 km away at the most in a straight line. In rural areas with more than 200 addresses, at least one letterbox is required.
Malta	There must be one letterbox as close as possible to every locality centre, where postal items are collected 6 days a week (Monday to Saturday, except on holidays). In localities with population density exceeding the national average, 98% of users must be 400 meters away at the most from a letterbox. In localities with population density below the national average, 98% of users must be 800 meters away at the most from a letterbox.
The Netherlands	In residential centres with more than 5000 inhabitants, the universal postal service provider must make a letterbox available within a radius of 1 km for the deposit of items of correspondence. In other areas, the universal postal service provider must make a letterbox available within a radius of 2.5 km.
Poland	The number of letterboxes sat by the postal operator in a specific postal area must be adjusted to the needs of the local community. The rate of letterboxes sat (namely at postal establishments) to ensure accessibility of wheelchair users may not be lower than 95% in every postal area.
Romania	At least one point of access per locality. In addition, one letterbox is required for every 3000 inhabitants in urban areas, and one letterbox per 20 000 inhabitants in Bucharest.
Serbia	At least one letterbox in rural areas with more than 1000 inhabitants. In rural areas with less than 1000 inhabitants, letterboxes may be sat where at least five postal items are deposited in average a day. In areas with up to 200 000 inhabitants, one letterbox is required per every 5000 inhabitants. In areas with more than 200 000, one letterbox is required per every 10 000 inhabitants.
Slovenia	One letterbox: for every 400 inhabitants in cities with less than 5000 inhabitants; for every 700 inhabitants in cities between 5001 and 25 000 inhabitants; for every 1000 inhabitants in cities between 25 001 and 80 000 inhabitants; for every 1300 inhabitants in cities between 80 001 and 250 000 inhabitants, and for every 1500 inhabitants in cities with more than 250 000 inhabitants.
Slovakia	In residential areas with 500 to 1000 inhabitants, one letterbox is required where the nearest letterbox is more than 5000 meters away. In areas with 1001 to 3000 inhabitants, one letterbox is required. In localities with 3001 to 30 000 inhabitants, one letterbox must be sat for every 3000 inhabitants. In localities with more than 30 000 inhabitants, one letterbox is required for every additional 5000 inhabitants.
United Kingdom	Minimum of 11 500 (those located at postal establishments). One letterbox is required 0.5 miles away at the most for 98% of the population. Where users have no point of access in a radius of 0.5 miles, the USP must ensure access to the universal service so as to meet the needs of these users. At national

level, points of access for larger items and registered items must be 5 km away at the most for 95% of the population. In every post code area, at least 95% of the population must be 10 km away from letterboxes and all points of access must be available according to duly published opening hours. USP must ensure that people with special needs are able to deposit postal items with the postal network at no “additional cost”.

Source: Questionnaire submitted by ANACOM to ERGP

**Annex 2 - Objectives of postal network density and minimum services
provided**

**Objectives of postal network density and minimum services provided
(under Base XV of the Universal Postal Service Concession)**

I. Scope

1. This document defines:

- a) Density objectives of postal establishments and other points of access to the postal network allocated to the concession;
- b) Objectives of minimum services provided, including rules on minimum operating periods of postal establishments.

2. Objectives and rules referred to in the preceding paragraph are set for a three-year period, covering the period from 01.10.2017 to 30.09.2020, being guaranteed by the concessionaire (CTT – Correios de Portugal, S.A.) on each and every day they are in force.

3. Objectives and rules referred to in paragraph 1 may be revised prior to the expiry of each period, where required by the exceptional circumstances of the case. The request for revision may be lodged both by ANACOM and the concessionaire.

4. For the purpose of paragraph 1, the following definitions apply:

- a) *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, whereby:
 - i. *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;

- ii. *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.
- b) *Other points of access to the postal network* - letterboxes, namely *marcos* and *caixas de correio*, whereby:
- i. *Marcos de correio* - infrastructures made available to the public, located on the public highway, where users may deposit postal items with the postal network;
 - ii. *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.

II. Density of postal establishments

Objectives of network density at locations where concessionary services are provided are set at the level of postal establishments.

The criterion for the distribution of postal establishments include:

- a) Density of postal establishments, defined as the number of inhabitants per postal establishment;
 - b) Maximum distance of accessibility to the service, expressed in meters travelled by the residing population to reach the nearest postal establishment.
1. At national level, the concessionaire shall guarantee that the average number of inhabitants per postal establishment is lower than or equal to 4600 inhabitants.
 2. At national level, the concessionaire shall guarantee one postal establishment within the maximum distance of 6000 meters from the place of residence for 95% of the population.
 3. At the level of urban areas, which include predominantly and moderately urban areas¹, the concessionaire shall guarantee one postal establishment within the maximum distance of 4000 meters from the place of residence for 95% of the population.

¹ According to the typology of urban areas defined by INE (Determination No. 1494/2014, Official Gazette No. 144, II Series of 29.07.2014 – 39th Determination of the *Secção Permanente de Coordenação Estatística* on the typology of urban areas - 2014), known as TIPAU 2014, taking into consideration the Official Administrative Map

4. At the level of rural areas, which include predominantly rural areas², the concessionaire shall guarantee one point of access within the maximum distance of 11 000 meters from the place of residence for 95% of the population.
5. In parishes with more than 20 000 inhabitants, the concessionaire shall guarantee at least one postal establishment providing the full range of concessionary services and an additional postal establishment, providing the same range of services, for each additional 20 000 inhabitants.
6. In parishes where the number of inhabitants exceeds 10 000 and is equal to or lower than 20 000 inhabitants, the concessionaire shall guarantee at least one postal establishment providing the full range of concessionary services.

Methodological notes:

- a) Only postal establishments which the general public has access to are taken into consideration, being excluded those which are only available for contractual clients or companies;
- b) The quantification of indicator 1 is based on data provided by INE for the country's residing population, according to the 2011 Census;
- c) Quantification of indicators 2, 3 and 4:
 - i. Take account of the distribution of the population at national level, the urban or rural nature of residing areas, according to the typology of urban areas defined by INE (the National Statistics Institute) in 2014 (TIPAU 2014), bearing in mind the Official Administrative Map of Portugal resulting from the implementation of the Municipal Territorial Administrative Reorganisation (CAOP 2013);
 - ii. The location of residing population is based on data from the 2011 general population census, at Statistical Subsection level;

of Portugal resulting from the implementation of the Municipal Territorial Administrative Reorganisation (CAOP 2013).

² Idem.

- iii. Do not take into consideration: mobile postal establishments; the post office located in the Selvagens Islands (Autonomous Region of Madeira);
 - iv. The calculation of areas of influence of postal establishments does not take account of roads for authorities, traffic directions and toll roads;
 - v. In the calculation of the population that is at a specific maximum distance from a postal establishment, consideration is taken of statistical subsection population the centroid of which is within the referred maximum distance. As such, in case only a part of a specific statistical subsection is within the referred maximum distance, where the centroid of that subsection is within that maximum distance, it is deemed that all the subsection, as well as the population residing therein, is within the referred maximum distance. On the contrary, where the centroid of that subsection is at a greater distance, it is deemed that all the subsection, as well as the population residing therein, is at a greater distance;
- d) Without prejudice to the reporting by CTT of values of indicators, under chapter V below, the calculation of indicators 2, 3 and 4 shall be undertaken by ANACOM, using, for the definition of areas of influence of each postal establishment, a road network database of Portugal for each year, updated on an annual basis. This is the relevant calculation to check compliance with objectives set out.
- e) In order to check compliance with indicators on percentages, the value achieved by CTT shall be rounded to the decimal place. For other indicators, the value achieved shall be rounded to the whole number.

III. Density of letterboxes

Objectives of network density as far as this equipment is concerned are defined at the level of the geographic points where letterboxes are located, that is, in locations where more than one piece of equipment exists, only one should be accounted for.

The criterion for distribution of letterboxes (*marcos do correio* and *caixas de correio*) is the density of letterboxes, defined as the number of inhabitants per point of access to a letterbox, located in the public highway or in public access locations.

1. At national level, the concessionaire shall guarantee that the number of inhabitants per geographic point of access to a letterbox is lower than or equal to 1100 inhabitants.
2. Taking into account the urban or rural nature of covered areas, the concessionaire shall guarantee that the number of inhabitants per point of access to a letterbox is lower than or equal to:
 - a) Predominantly urban area: 1767 inhabitants per letterbox;
 - b) Moderately urban area: 881 inhabitants per letterbox;
 - c) Predominantly rural area: 492 inhabitants per letterbox.
3. The concessionaire shall guarantee the existence of at least one letterbox per parish, as well as at least one point of access to letterboxes for deposit of national standard mail, in every parish.

Methodological notes:

- a) Letterboxes that present restrictions for use by the general public are not taken into consideration.
- b) Letterboxes that may not be accessed for a minimum period of hours every day are excluded. For the purpose of the quantification of indicators, only points of access operating for a 9-hour minimum daily period of time, between 8 am and 10 pm, are taken into consideration.
- c) Quantification of indicators 1 and 2 are based on data provided by INE for the country's residing population, according to the 2011 Census.
- d) The quantification of indicator 2 takes into consideration the typology of urban areas defined by INE (the National Statistics Institute) in 2014 (TIPAU 2014), bearing in mind the Official Administrative Map of Portugal resulting from the implementation of the Municipal Territorial Administrative Reorganisation (CAOP 2013).
- e) In order to check compliance with indicators on percentages, the value achieved by CTT shall be rounded to the decimal place. For other indicators, the value achieved shall be rounded to the whole number.

IV. Minimum services provided

1. The concessionaire shall ensure the provision of a post service for the blind.
2. In every municipality, at least one postal establishment shall provide the full range of concessionary services, operating:
 - a) 99% of the cases, all working days for a minimum daily period of 6 hours;
 - b) In remaining cases, all working days for a minimum daily period of 3 hours.
3. The percentage of postal establishments providing the full range of concessionary services intended for the occasional segment, in the total of postal establishments, shall be at least 75%.

For this purpose, *postal establishments providing the full range of concessionary services intended for the occasional segment* shall mean postal establishments providing the basket of services more usually used by the occasional segment of users, which includes the following services: standard mail, priority mail, easy mail, registered mail, insured mail, books and parcels, postal orders (issue and payment) and collections.

4. The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment shall be:
 - a) At national level: 8500 meters for 97.5% of the population;
 - b) At the level of urban areas³: 5500 meters for 97.5% of the population;
 - c) At the level of rural areas: 15000 meters for 97.5% of the population.
5. The maximum distance to a postal establishment providing the full range of concessionary services intended for the occasional segment shall be 30 000 meters at the most, for the whole of the population.
6. In rural areas, for population residing more than 10 000 meters away from the nearest postal establishment, postmen shall also perform itinerant customer service operations, which specifically include sale of stamps and prepaid envelopes, acceptance of non-

³ Predominantly urban area and moderately urban area.

registered mail, acceptance of non-registered and registered mail and home payment of postal orders.

7. The percentage of postal establishments providing the legal summons and notifications service compared to all establishments shall be at least 50%.
8. By virtue of the existence of shorter opening hours in some post offices operating in villages, which cannot operate at an alternative location, the operation of postal establishments for shorter opening hours shall be admitted.

Postal establishments operating for shorter opening hours shall be deemed to be those opened to the public less than 5 working days or 15 hours a week, excluding those opened to the public for a period of at least 5 calendar days and 20 hours a week or more.

In this respect, the following is defined:

- a) At national level, the number of postal establishments operating for shorter opening hours shall not exceed 1.5% of all postal establishments;
- b) In each municipality, the number of postal establishments operating for shorter opening hours shall not exceed 20% of postal establishments of each municipality or one postal establishment in the case of municipalities with less than five establishments.

Methodological notes:

- a) Only postal establishments which the general public has access to are taken into consideration, being excluded those which are only available for contractual clients or companies.
- b) Quantification of indicators 4, 5 and 6:
 - i. Take account of the distribution of the population at national level, the urban or rural nature of residing areas, according to the typology of urban areas defined by INE (the National Statistics Institute) in 2014 (TIPAU 2014), bearing in mind the Official Administrative Map of Portugal resulting from the implementation of the Municipal Territorial Administrative Reorganisation (CAOP 2013);

- ii. The location of residing population is based on data from the 2011 general population census, at Statistical Subsection level;
 - iii. Do not take into consideration: mobile postal establishments; the post office located in the Selvagens Islands (Autonomous Region of Madeira);
 - iv. The calculation of areas of influence of postal establishments does not take account of roads for authorities, traffic directions and toll roads;
 - v. In the calculation of the population that is at a specific maximum distance from a postal establishment, consideration is taken of the statistical subsection population the centroid of which is within the referred maximum distance. As such, in case only a part of a specific statistical subsection is within the referred maximum distance, where the centroid of that subsection is within that maximum distance, it is deemed that all the subsection, as well as the population residing therein, is within the referred maximum distance. On the contrary, where the centroid of that subsection is at a greater distance, it is deemed that all the subsection, as well as the population residing therein, is at a greater distance;
- c) Without prejudice to the reporting by CTT of values of indicators, under chapter V below, the calculation of indicators 4 and 5 shall be undertaken by ANACOM, using, for the definition of areas of influence of each postal establishment, a road network database of Portugal for each year, updated on an annual basis. This is the relevant calculation to check compliance with objectives set out.
- d) In order to check compliance with indicators of percentages, the value achieved by CTT shall be rounded to the decimal place. For other indicators, the value achieved shall be rounded to the whole number.

V. Reporting to ANACOM

The concessionaire shall send to ANACOM, by the 15th day of the 2nd month following the end of the (calendar) quarter concerned, the following information:

- a) Information on performance levels (values achieved) for each indicator defined;
- b) Information on postal establishments and letterboxes operating by the end of each reporting period.

b.1) For each postal establishment, the following information shall be supplied:

- a. unambiguous code of the establishment;
- b. type (ex. post station, post office);
- c. designation;
- d. address;
- e. designation of the district, municipality and parish where the establishment is located;
- f. code of the parish where it is located;
- g. geographic location coordinates, preferably in the WGS84 reference system, with the accurate indication of geographic coordinates;
- h. opening hours⁴;
- i. services provided.

b.2) For each letterbox, the following information shall be supplied:

- a. unambiguous code of the letterbox and respective point of access that is associated;
 - b. type (*marco* or *caixa*);
 - c. address;
 - d. designation of the district, municipality and parish where the letterbox is located;
 - e. code of the parish where it is located;
 - f. geographic location coordinates, preferably in the WGS84 reference system, with the accurate indication of geographic coordinates;
 - g. time of last collection.
- c) Information on changes occurred, in each period, in the pool of postal establishments, as well as respective opening hours, including the date of the alteration and respective grounds.
- d) Information on changes occurred, in each period, in the pool of letterboxes, including the date of the alteration and respective grounds.

Information referred in b), c) and d) shall be submitted as an electronic file (Excel).

CTT shall identify, where appropriate, the information deemed to be confidential, together with the respective grounds.

⁴ In the case of post offices, the reported opening hours correspond to opening hours indicated by a notice as the post office's opening hours, which may differ from opening hours indicated for the establishment where the post office operates.