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**AUDITION REPORT OF INTERESTED PARTIES REGARDING THE  
OBJECTIVES FOR DEVELOPMENT OF THE PUBLIC POSTAL  
NETWORK AND THE MINIMUM SERVICES OFFER**

## I. OVERVIEW

The Board of Directors of ANACOM has approved on 21/03/03 an audition on the objectives for development of the public postal network and the minimum services offer<sup>1</sup>.

In this context, on 26/03/03, it has been requested information and commentaries, namely, to the following entities: consumer associations, associations representing population with special needs, Associação Nacional de Municípios Portugueses (Portuguese City Council National Association), Associação Nacional de Freguesias (Parish National Association), corporate associations and postal service providers.

## II. AUDITION REPLIES AND ANACOM's UNDERSTANDING

The deadline for contributions reception ended on 30/04/03, having been received five replies<sup>2</sup>: National Secretariat for the rehabilitation and integration of persons with deficiency (SNRIPD), Instituto do Consumidor (IC), Rangel, TNT and CTT.

Following on, it is presented a synthesis, integrating received answers, without prejudice to the consultation of each individual contribution (in annex), and the corresponding ANACOM's understanding, following the questions sequence formulated in the audition.

*Question no. 1: " Considering, namely, the information made available in 2.6 on penetration of postal establishments, do you consider the existing number of post-offices, mail posts, pillar and mail-boxes for the purpose of gathering the mail, enough for the population needs, including population with special needs (PNE)? Detail your answer according to your residential area and activity, in separate."*

Globally, the existing number of post offices, mail posts, pillar-boxes and mailboxes were considered enough. The general opinion was, also, that the attendance and the services in general will have to adjust more to the Population with Special Needs (PNE), namely: (i) in respect to mail posts and post offices, the improvement of the signaling for easy access, the elimination of architectonic barriers and priority attendance for people with reduced mobility and (ii) with respect to pillar-boxes, taking into account the alignment with the remaining urban furniture and the facilitation of the access for disabled motorists.

It was, also, pointed out that the timetable in use must be studied considering the population to be served (urban and suburban).

<sup>1</sup> See <http://www.anacom.pt/template15.jsp?categoryId=49129>

CTT reported that the public postal network would be over sized in relation to demand (mainly inland), especially vis-à-vis data of international comparison at European level. According to this operator, that results in a high cost, suggesting the evolution to “innovative solutions” at network management (e.g. development of alternative models for attendance providing, implementing own and third parties new products/services).

### ANACOM's understanding

The number of post offices, mail posts, pillar-boxes and mailboxes seems to be at this moment, adequate, having however to take precautions for the adaptation possibility as to the evolution of the users needs.

As regards the PNE needs, it is considered to be the concessionaire's responsibility to observe the measures that the utilization of the service by the users with special needs, cart. It should, namely, and when necessary, adjust the structures where that service is provided, to the purpose of guaranteeing its easy access, fulfilling the technical rules on accessibility of the urban constructions, constant in suitable diploma (Dec-Law no. 127/97, of 22 May).

Relatively to the definition of timetables, network dimensioning and attendance models it is considered that in an increasing liberalization sector, some flexibility will have to be granted to by CTT in regard to these matters, so as to that company can manage in a efficient and competent way its resources, having, without prejudice, to guarantee that the timetables, network development and attendance models are established in accordance with the satisfaction of demand needs of the served population.

It is admitted, also, that in Europe an effort has been made to reorganize the postal operators network, in a sense of a bigger rationalization, for that should be made without prejudice of the universalization of access to the postal services, of postal service providing with adequate quality level and of the maintenance of products range compatible with the users' interest.

*Question no. 2: “ Do you consider that the objectives of development of the public postal network should be defined, concerning namely, post-offices, mail posts, pillar and mail-boxes for the gathering of postal dispatch according to geographical dispersion and population density?”*

With exception of a service provider, who considers that the objectives for development of the public postal network should not be established, all the answers consider that these will have to be defined taking into account the geographic dispersion and the population density. CTT considers, also, that it should be disclosed the needs and levels of demand of the different communities, customers segments, rationality criteria and economical, social and enterprise profits.

## ANACOM's understanding

In this context, ANACOM understands that the geographic dispersion and population density criteria must stand out and agrees that the needs and level of demand of the different communities, customer segments, rationality criteria and economical, social and enterprise profits, are also aspects that should be taken into account when setting these indicator levels.

*Question no. 3: " In this context, and in case of an affirmative answer to the previous question, do you consider the indicators presented on the following table to be enough or do you consider necessary to define other indicators? If you consider necessary to define other indicators, point out which ones and the reasons"*

**Table 3**

*Indicators in the scope of objectives of development of public postal network and minimum services offering*

*Average nr. of inhabitants per post-offices and mail posts*

*[= resident population / post-offices + mail posts]*

*Average covered area ( in Km2) per post-offices and mail posts*

*% of places with 1000 or more residents, with post-offices and mail posts*

*% of places with less than 1000 residents, with post-offices and mail posts*

*Average no. of inhabitants per pillar and mail boxes for gathering of mail dispatches*

*[= resident population / pillar and mail boxes for gathering of mail dispatches ]*

*Average covered area ( in Km2) per pillar and mail boxes for gathering of mail dispatches*

All the entities/enterprises have considered sufficient the indicators considered in table 3, with the exception of a service provider who considers being these an impediment for the future private operators.

CTT refers that the *place* concept does not correspond to any instituted administrative territorial division, nor is referenced for statistical purpose, having to be substituted by one which reflects one of the administrative territorial divisions and normally used for statistical purposes, as it is the case of the parish, the administrative base unit. Thus, they consider that the indicators 3 and 4 must refer the percentage of parishes with 1000 or more residents and percentage of parishes with less than 1000 residents with post-offices or mail posts.

## ANACOM's understanding

As for the suggested indicators in the audition document, in view of the received answers, ANACOM does not see necessity to proceed to their alteration, as it is not obvious where the applicable indicators to CTT can constitute an obstacle to its competitor's activities.

ANACOM clarifies, yet, that according to Instituto Nacional de Estatística (INE) exists a definition of "place" that it is expressed by "population agglomerate with ten or more lodgings destined to people's residence and with a designation of its own, besides belonging to one or more parishes". Adds to that, still, that according to Censuses 2001 information, constant in INE's *Internet* site, the results are available by places.

In this context, taking into account the existence of place definition, it is considered pertinent the definition of levels for these agglomerates in a way to guarantee the universal service providing in whole of the national territory, according to valid legal framework, namely, as for one of basic principles mentioned in the Basic Law for Postal Services: "Guarantee the existence and availability of the provision of universal service, comprising a set of essential postal services permanently provided throughout national territory under appropriate quality conditions and at prices accessible to all users". This desegregation will be essential to guarantee the universalization of the services.

*Question no. 4: Which territory unit should be considered on the definition of values for the density of post-offices and mail posts? For example: national total, Continental Portugal and Autonomous Regions of Azores and Madeira, NUTS II<sup>1</sup> regions, NUTS III regions, district, council, parish, place, other.*

For one of the service providers, the indicators such as presented in the audition are right, not needing greater disaggregation. Another service provider has stated that the territorial unit to be considered will have to correspond to NUTS III, whereas for CTT, should be the national total, being that the possible disaggregation by geographic zones will have to consider consistent units with the commercial management. According to other two answers, the territorial unit to be considered should be the parish.

It is stressed the mentioned reference as regards the definition of zones, taking into account the population density and dispersion, since some disparity between the coastal and the inland areas is verified (besides the islands specificity) and should have a differentiated treatment (e.g. different zones classification, according to the number of inhabitants: large metropolises, coastal area and inland area).

ANACOM's understanding

ANACOM understands, as for the disaggregation by commercial management mentioned by CTT, that these do not correspond to the instituted administrative territorial divisions, nor are they referenced for statistical purposes, for that is not appropriate its utilization.

Before the obtained answers, it is supposed, that, theoretically, the establishment of values for the density of postal establishments for NUTS III would be acceptable. However, as far as the universalization objectives is concerned, it is considered that, yet, it should reach a greater desegregation level, i.e., at parish level and at place level, namely checking what percentage of parishes is served by at least one post-office or mail post and what percentage of places with less and more than 1000 inhabitants with post-offices or mail posts. This way, taking into account the indicators definition, simultaneously, national level, parish level and places level, it would be redundant the establishment of indicators for NUTS III.

### **III. CONCLUSION**

In a general way, the replies to the audition stresses a set of objective concerns in the audition document on the development of the public postal network and the objectives of minimum services offers, technical characteristics and advanced resources.

As for the objectives, to be defined for the minimum services offer it is pointed out the ANACOM's concern guaranteeing gradually the universal services providing at the postal establishments in general (post-offices and mail posts), in a way to guarantee that all the citizens have access to those same services.

The result of the audition and ANACOM's understanding will be considered in the scope of the agreement proposal to be presented at CTT on the objectives for development of the public postal network and the minimum services offer, technical characteristics and advanced resources.