

**Maltapost Plc's Universal Service Obligations -  
Accessibility, Daily Delivery, Provision of Information  
Consultation Paper**

**4<sup>th</sup> April 2008**

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## Foreword

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The key responsibility of the Malta Communications Authority (MCA) in respect of the postal sector is to ensure an affordable high quality universal postal service in Malta. This implies that users at all points in Malta shall enjoy the right to a universal service involving the permanent provision of a range of postal services of specified quality, as may be prescribed, and at affordable prices.

This consultation document discusses the obligations incumbent on Maltapost Plc (hereinafter referred to as Maltapost) as the Universal Service Provider (USP) and addresses the rights of the consumer with respect to **access to services**, the **guarantee of daily delivery** and the **publication of information** of what is on offer.

The outcome of this consultation together with other work streams currently being undertaken by the MCA with respect to the provision of the universal postal service, such as: the approach to monitoring compliance with universal service tariff principles (e.g. affordability, geared to cost, uniform tariffs), ensuring the integrity and security of mail, and the setting and monitoring of quality of service (QoS) standards, should ensure that the universal postal service in Malta is properly safeguarded.

### Access to Universal Postal Services

Access points for services falling within the universal service include: the USP's public letterboxes,<sup>1</sup> retail counters operated by the USP (referred to by Maltapost as branch post offices), sub-post offices operated by third parties<sup>2</sup> and the facilities provided to deposit bulk mail.<sup>3</sup>

This consultation document evaluates the existing density of the above-mentioned access points and puts forward proposals that aim to establish parameters to be used to ascertain the **minimum** density of postal access points to ensure that the USP's obligation in this area are being met and the rights of the consumer addressed.

Other related but important aspects that improve accessibility to the universal postal service are also examined in this consultation document. These include

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<sup>1</sup> The normal pillar/wall letterbox (sometimes referred to as post-boxes) provided by the USP, either inside or outside a post office or at the side of a public road constitutes an important access point for single piece mail as these enable consumers to post their letters without having to go to a post office. Single piece letter mail is generally defined as the ordinary day-to-day correspondence posted by individuals and businesses, big and small (other than bulk mail), at street letterboxes or over the counter at postal outlets (such as post offices or sub-post offices). This comprises correspondence in standard envelopes which do not require special facilities at either the collection or delivery stage.

<sup>2</sup> Retail counters (i.e. post offices and sub-post offices) represent the only access points for the following universal service products: packets, parcels, insured and registered items. This comprises correspondence in larger envelopes or packages, or documents and goods weighing up to 20kg per item, or which requires specific services such as registration in addition to normal postage. Because of the size of the item or the service required, the item must be handed to an authorized representative of the USP and/or be delivered personally to someone at the address on the item (or if that is not possible, to be made available for collection from the premises of the USP).

<sup>3</sup> Bulk mail means correspondence, documents or publications consisting of a substantial number of similar items which are deposited with Maltapost, at the same place and at the same time to be conveyed and delivered to the addressees indicated on the items themselves or correspondence. This includes direct mail (as a particular form of Bulk Mail) as defined in the Postal Services Act.

the availability of facilities to purchase postage stamps and the frequency and timing of collections from Maltapost's access points.

### **Guarantee of Daily Delivery**

The USP has an obligation to guarantee at least one (1) collection from each postal access point and one (1) delivery of mail to each postal address or other delivery point (household and business) on each working day.

Collection and deliveries of postal articles form the backbone of the universal postal service, as they are essential for the USP to secure its next day delivery obligation and quality of service targets.<sup>4</sup>

This consultation document examines whether the current arrangements are satisfactory and whether changes in this area are warranted.

### **Publication of Information**

It is important that consumers are clearly informed about the universal postal services which are provided, the prices and conditions pertaining to them, and are sufficiently knowledgeable in their use.

This consultation document puts forward proposals on what information should be provided and what media should be used in relation to the universal postal service, including amongst others, postcodes and postal service schemes.

### **Conclusion**

The MCA is seeking the views of all interested parties on the proposals put forward in this consultation document. This consultation will run from **4<sup>th</sup> April to 30<sup>th</sup> May 2008**. Please refer to **Section 5** for further details about submitting comments.

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<sup>4</sup> Refer to the MCA's Decision dated 6<sup>th</sup> December 2007 on the Quality of Service (QoS) Targets to be achieved by Maltapost for the universal postal services.

## 1. Introduction

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The MCA is responsible for the regulation of universal postal services in Malta in accordance with national and European Commission (EC) legislation. The MCA is the National Regulatory Authority (NRA) for the purpose of that legislation. In carrying out its functions the MCA is obliged to take into account the views of interested parties.

This consultation document discusses the universal postal service obligations incumbent on Maltapost and addresses the rights of the consumer with respect to access to services, the guarantee of daily delivery, and the publication of information of what is on offer.

Prior to discussing the obligations incumbent on Maltapost and the rights of the consumer it is important to provide the reader with an understanding of what is meant by a universal postal service.

### 1.1 Overview of the Universal Postal Service

Universal postal services can be defined as concrete services (or products) which a consumer is entitled to access no matter where he or she lives. These services must be accessible, of a specified quality and affordable.

The main act governing postal services in Malta is the Postal Services Act (hereinafter referred to as the Act).<sup>5</sup> The Act establishes the criteria on which the universal postal service should be set. The universal postal service should be: affordable,<sup>6</sup> accessible,<sup>7</sup> and of a set quality.<sup>8</sup> The universal services on offer must comply with essential requirements,<sup>9</sup> be identical under comparable conditions and offered in a non-discriminate way and on a permanent basis.<sup>10</sup> The Act also states that universal postal services can only be interrupted or stopped in the case of *force majeure*.<sup>11</sup> Another important principle with respect to the provision of the universal postal service reiterated in the Act is that the universal service should evolve in response to the technical, economic and social environment and to the needs of users.<sup>12</sup> This means that the products and services forming part of the provision of the universal service may increase or decrease depending on society's needs at any point in time.

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<sup>5</sup> The provisions of the Postal Services Act reflect the European Union (EU) Postal Directive 97/67/EC as amended by Directive 2002/39/EC.

<sup>6</sup> Refer to Article 17 (1) (a) whereby 'users at all points in Malta shall enjoy the right to a universal service involving the permanent provision of a postal service of a quality as may be prescribed and, subject to article 21(1), at affordable prices for all users'. Article 21 (1) states that 'prices must be affordable and must be such that all users have access to the services provided'.

<sup>7</sup> Refer to Article 17(1) (a) of the Act whereby 'users at all points in Malta shall enjoy the right to a universal service' and Article 17 (2) of the Act whereby 'the Authority shall issue directives to ensure that the density of access points takes account of the needs of users'.

<sup>8</sup> Refer to Article 17(1) (a) & (b) of the Act.

<sup>9</sup> The Act defines 'essential requirements' as 'general non-economic reasons which can induce the Government to impose conditions on the supply of postal services. Such reasons are the confidentiality of correspondence, security of the network as regards the transport of dangerous goods and, where justified, data protection, environmental protection and regional planning.'

<sup>10</sup> Refer to Article 21(1) of the Act.

<sup>11</sup> Refer to Article 18(d) of the Act.

<sup>12</sup> Refer to Article 18(e) of the Act.

As clearly listed in the Act, the five (5) generic areas of service that the USP is required to provide as universal postal services are:

- the clearance, sorting, transport and distribution of postal articles up to two (2) kilogrammes;
- the clearance, sorting, transport and distribution of postal packages up to twenty (20) kilogrammes;
- services for registered articles;
- services for insured articles within Malta and to and from all countries; and
- a basic counter service throughout Malta.<sup>13</sup>

The Postal Services (General) Regulations<sup>14</sup> (hereinafter referred to as the Regulations) further delineate the obligations that constitute the universal postal service and the services that must be provided by the USP.<sup>15</sup>

Maltapost's Licence sets out Maltapost's obligation, as the designated USP,<sup>16</sup> to provide a universal postal service across Malta, and regulates matters relating to the necessary characteristics of the universal postal services, including amongst others, the quality of service that is to be guaranteed, compensation, mail integrity, complaint handling, accounting separation obligations, and tariff and price principles in relation to the universal service.<sup>17</sup>

## 1.2 Structure of the Document

The remainder of this document comprises the following:

**Section 2** reviews the current situation and makes proposals on the aspect of accessibility to universal postal services.

**Section 3** reviews the universal service obligation with the aim of safeguarding the daily delivery obligation.

**Section 4** reviews how the USP is currently providing information regarding the universal service and makes proposals to safeguard and encourage improvements in this area.

**Section 5** provides further details about responding to this consultation.

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<sup>13</sup> Refer to Article 17(5) of the Act.

<sup>14</sup> Refer to Postal Services (General) Regulations – Legal Notice 328 of 2005.

<sup>15</sup> Refer to Regulation 23. In addition, the USP is also required to provide the collection and onward transmission of postal articles for destinations outside of Malta and the receipt and delivery of postal articles originating outside of Malta for addresses within Malta and services for the blind or partially sighted persons as shall be agreed from time to time with the Authority. With respect to the provision of a service for delivery of international inbound mail, Malta is also subject to the requirements of the Universal postal Union (UPU).

<sup>16</sup> Refer to Article 17(3) of the Act whereby 'the Minister shall, after consultation with the Authority, by notice in the Gazette, designate a postal operator as the USP having an obligation to provide all the universal services'. Through Legal Notice 296 of 2004 the Minister for Competitiveness and Communications (MCMP), after consultation with the MCA, designated Maltapost as the USP with the obligation to provide all the universal services required by or under the Act.

<sup>17</sup> Refer to Maltapost Plc Licence (Modifications) Regulations – Legal Notice 500 of 2004 (Section C).

## 2. Access to Universal Postal Services

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This section evaluates the existing provision of postal access points and puts forward proposals on the parameters and procedures to be used to ascertain the **minimum** density of access points to be provided by the USP. This section also considers the availability of facilities to purchase postage stamps and the frequency and timing of collections from Maltapost's access points.

### 2.1 Legislative Backdrop

The Act defines 'access points' as **physical facilities, including letterboxes<sup>18</sup> provided for the public either on streets, public ways or at the premises of the postal operator, where postal articles may be deposited with the public postal network by customers.**

In relation to post offices,<sup>19</sup> the Regulations state that the 'Authority may by directive require the USP to establish post offices at such premises and from such dates as it may determine so as to ensure a basic counter service throughout Malta'.<sup>20</sup>

The 'basic counter service' as detailed in the Regulations should include: **the sale of stamps and postal stationery; posting and collection of bulk mail; posting and collection of postal articles including parcels; registration and insurance of postal articles; and any other service as the MCA may from time to time by directive require the USP to provide.**<sup>21</sup>

As stated in Maltapost's licence, Maltapost may only close or move access points in agreement with the MCA, which may also make provision for the opening of new access points. The MCA must also make provisions for the principles and procedures to be followed by Maltapost with respect to the closure or movement of existing access points or the establishment of new access points. Such principles and procedures must be established in consultation with Maltapost, the users of the service and other stakeholders as necessary.<sup>22</sup> In addition, without prejudice to any law regulating planning development, access points shall be readily accessible to disabled customers.

In April 2006 the MCA published its Directive 1 of 2006<sup>23</sup> which set out the procedure that Maltapost must follow in effecting changes in relation to the days and/or times of opening of any post office,<sup>24</sup> and/or changes to the days of delivery and/or of collection of postal articles.<sup>25</sup> In line with this Directive, when

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<sup>18</sup> 'Letterbox' includes every pillar box, wall box, and every other box or receptacle provided under the permission of the Authority for the purpose of receiving postal articles.

<sup>19</sup> 'Post office' includes any branch or subdivision of a postal operator, and any house, building, room, vehicle, place or device used for the purposes of the postal operator, and any letterbox.

<sup>20</sup> Refer to Regulation 12 of the Regulations. This obligation is also set out in Maltapost's licence whereby Maltapost is required to provide a basic counter service throughout Malta to enable access to universal services - Refer to Maltapost Plc Licence (Modification) Regulations, Regulation 3 par. 17.1(e).

<sup>21</sup> Refer to Regulation 10 of the Regulations.

<sup>22</sup> Refer to Maltapost's licence obligations - Legal Notice 500 of 2004 Regulation 17.4.

<sup>23</sup> Refer to <http://www.mca.org.mt/filesystem/pushfile.asp?id=804&source=3&pin=>.

<sup>24</sup> This includes Maltapost's post offices and sub post offices run or operating for or on behalf of the USP with respect to the provision of a basic counter services, and letterboxes.

<sup>25</sup> Article 39 of the Act gives the MCA the power to establish the core hours during which post offices must be open to the public.

Maltapost needs to change the days and/or times of a service, it must submit a formal request to the MCA. Such a request must be done at least twenty (20) days before the day when Maltapost proposes to implement the requested change in the provision of the service. In submitting this request Maltapost must provide sufficient reason to justify the need to resort to such a change and provide the MCA with such contingency plans as are necessary in order to minimise, as far as is reasonably possible, any inconvenience to the public. This Directive also sets the timeframes and the type of media that must be used to inform the public of such changes.

With respect to the facility to purchase postage stamps the Regulations state that the USP shall ensure that, where feasible, there is available a facility to buy postage stamps in the *vicinity* of every letterbox.<sup>26</sup> It also states that there must be sufficient stock of postage stamps to satisfy the needs of each locality and that the Authority may, in particular to ensure the availability of postage stamps and postage stationary in any given locality, issue any such directives it considers appropriate to ensure that the USP abides with its obligations under this regulation.<sup>27</sup>

## 2.2 Maltapost's Current Policy

This section provides an overview of Maltapost's current operational policies and procedures with respect to the provision of access points available for services forming part of the universal postal service.

### 2.2.1 Letterboxes

**Table B.1 in Appendix B** provides a detailed list of Maltapost's present network of letterboxes available to the general public.<sup>28</sup> This list includes those public letterboxes found in post offices and sub-post offices but does not include private letterboxes made available by Maltapost on request and at a yearly fee. Private letterboxes are those letterboxes found in private and public premises, amongst others, hotels, hospitals and sports facilities.<sup>29</sup>

Maltapost's current provision of public letterboxes has not changed much over the past couple of years with a total number of 468 letterboxes throughout Malta and Gozo (421 in Malta and 47 in Gozo).<sup>30</sup> With regard to the re-siting of letterboxes (i.e. moving an existing letterbox to a new location) in addition to seeking prior consent from the MCA, Maltapost consults with the local council(s) concerned.<sup>31</sup>

### 2.2.2 Retail Counters

**Table B.2 in Appendix B** provides a detailed list of the current retail counters providing a basic counter service. These include those retail counters operated

<sup>26</sup> Refer to Regulation 9 of the Regulations.

<sup>27</sup> Refer to Regulation 11 of the Regulations.

<sup>28</sup> These include the normal pillar / wall letterbox provided by the USP, either inside or outside a post office or at the side of a public road.

<sup>29</sup> A 'private posting box' is a box approved by Maltapost and installed on business premises, in hotels or other premises, in which postal articles, other than registered letters and parcels, may be posted (refer to Maltapost's Private Posting Box Scheme - [www.maltapost.com](http://www.maltapost.com)).

<sup>30</sup> There exist an additional fifty-two (52) private letterboxes installed in private and public premises throughout Malta and Gozo.

<sup>31</sup> As stated in Maltapost's document entitled 'Maltapost's Street Letterboxes Directory in Malta and Gozo' and forwarded to the MCA in November 2007.



by Maltapost (referred to as branch post-offices) and those operated by third parties (referred to as sub-post offices). The list of retail counters offering basic counter services is categorised according to the operational areas used by Maltapost.<sup>32</sup> These areas generally have one post-office operated by Maltapost (Maltapost's branch post-office network) and a number of sub-post offices operated by third parties under a service contract with Maltapost.

Currently there are thirty-two (32) branch post offices and twenty-seven (27) sub-post offices throughout Malta and Gozo providing a basic counter service.<sup>33</sup> In the main Maltapost's branch post offices<sup>34</sup> are opened between 7:30am – 12:45pm from Monday to Saturday and sub-post offices are open between 8:00am – 1:00pm and 4:00pm – 6:00pm from Monday to Friday and 8:00am – 1:00pm on Saturday.<sup>35</sup> The 'basic counter service' provided by these retail counters, as detailed in the Regulations, includes: the sale of stamps and postal stationery, posting and collection of bulk mail, posting and collection of postal articles including parcels, and the registration and insurance of postal articles.<sup>36</sup>

In addition to providing a basic counter service, Maltapost's retail postal network also provides additional services which do not form part of the universal postal service, such as, the payment of utility bills and licences, tax collection, ticket sales, telephony cards, postal and other general stationery, and local and international money transfers. Maltapost also plans to enhance its existing product range to include the provision of low cost financial services.<sup>37</sup>

During the past few months Maltapost engaged in a drive to entice more entities/shops to operate as sub-post offices offering a basic counter service mainly in those localities: where there is no post office retail counter, where the locality is large enough to cater for an additional sub-post office, and where there are currently no sub-post offices.<sup>38</sup>

### **2.2.3 Bulk Mail Facilities**

The universal postal service also includes the provision of bulk mail services.<sup>39</sup> Postal articles consisting of one hundred (100) items or more of identical format and size may be handed over at any retail counter during their respective opening hours to be delivered by Maltapost to the addressees indicated on the postal articles themselves.<sup>40</sup>

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<sup>32</sup> These Maltapost defined operational areas are specifically designed by Maltapost to assist it in the provision of next day delivery of mail.

<sup>33</sup> There were approximately twenty (20) sub-post offices prior to the year 2004 and twenty-four (24) sub-post offices operated by third parties up to September 2007.

<sup>34</sup> Refer to [www.maltapost.com/page.asp?p=7176&l=1](http://www.maltapost.com/page.asp?p=7176&l=1).

<sup>35</sup> The Marsa Head Office opens from Monday to Friday from 8:00am to 1:00pm and from 1:30pm to 3:30pm, the Qawra Branch opens from Monday to Friday from 8:00am to 1:30pm, the Valletta Branch (Castille Place) opens from 8:15am to 3:45pm and on Saturday from 8:15am to 12:30pm and the Victoria Branch Office in Gozo opens from 8:15am to 4:30pm from Monday to Friday and 8:15am to 12:30pm.

<sup>36</sup> Refer to Regulation 10 of the Regulations.

<sup>37</sup> On the 18<sup>th</sup> February 2008 Maltapost's Naxxar branch post office started to cash cheques issued by the Department of Social Security, including pension cheques. Based on the response to the service, Maltapost will consider extending this service to other localities.

<sup>38</sup> Refer Maltapost's website: <http://www.maltapost.com/page.asp?n=newsdetails&I=5622> and <http://www.maltapost.com/page.asp?n=newsdetails&I=5607>.

<sup>39</sup> Maltapost only offers one type of bulk mail (including direct mail) service subject to next day delivery. Deferred bulk mail delivery services are at present not offered by Maltapost.

<sup>40</sup> Refer to <http://www.maltapost.com/page.asp?p=7089&l=1>.

When the amount of letters to be posted is substantial, posting of these items is generally effected at the Bulk Mail Section located in the Maltapost's Head Office building at Marsa. Maltapost's Bulk Mail Section provides additional and better facilities (such as appropriate parking facilities) for the posting of a significant amount of bulk mail items and is open between 8:00am – 4:00pm from Monday to Friday.

#### 2.2.4 Facilities to Buy Postage Stamps

**Table B.3** in **Appendix B** lists the number of stamp vendors found in each locality.<sup>41</sup> These outlets include Maltapost's branch post offices, sub-post offices and other outlets (such as shops) through which Maltapost makes available the sale of postage stamps for the pre-payment of postage.

In the main, Maltapost base the distribution of stamp vendors in a particular locality by taking into consideration the population density (i.e. the number of people living in a given area) and the postal activity in that locality.

#### 2.2.5 Frequency and Timing of Collections

In line with the obligation to guarantee daily delivery, daily collections of postal articles from letterboxes (including other collection points such as postal outlets according to the respective closing times) take place at 19:00 hrs from Monday to Friday and at 15:00 hrs on Saturday. In some instances Maltapost performs two (2) daily collections from the respective access points (such as in the case of high volume letterboxes).

Maltapost operates an electronic logging system that monitors and audits the operations involved in the collection of mail. Maltapost has installed this system with a view to ensuring that mail is collected from all collection points in a timely manner to allow time for sorting the mail collected, thereby securing next day delivery to the level required by the mandated quality of service standards.

### 2.3 Proposed Direction to Maltapost

This section depicts the MCA's proposed direction to Maltapost with respect to the parameters to be followed to ascertain the minimum density of access points and the procedures to be followed with respect to the permanent closure or movement of existing access points or the establishment of new access points. Proposals are also made regarding the availability of facilities to purchase postage stamps and the frequency and timing of collections from Maltapost's access points.

The MCA is proposing the rationalisation of existing levels of services and practices with respect to the **minimum** density of access points. In issuing directions to Maltapost the MCA must balance the needs of consumers with the sustainability of providing the facilities.

The MCA is conscious of the fact that the Maltese public has always been accustomed to an adequate network of access points to cater for its needs.

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<sup>41</sup> For comparative purposes the total population, population density and area have also been included in this table.

Therefore, the MCA's intention is to ensure that, as far as possible, existing standards are maintained, while providing Maltapost some scope for rationalising its network of access points to reflect current requirements.

The MCA believes that, as supported by the customer perception survey findings carried out in September and October 2006,<sup>42</sup> the majority of users are satisfied with the current level of access to postal services. The MCA is therefore of the view that any parameters to be used to ascertain the density of postal access points should not necessitate a significant change in the current provision of access points. Nonetheless it is felt that there is a need to rationalise this requirement by establishing parameters to be used to ascertain the minimum density of postal access points to ensure that both present and future user requirements can be catered for.

In proposing the parameters to be used to ascertain the minimum density of postal access points the MCA reviewed the policies and guidelines adopted by other countries. In general the countries reviewed, base their policies and guidelines on one or more of the following types of access criteria for accessing universal postal services: **density, distance, population** or **community-related criteria**.

**Table B.4** in **Appendix B** gives an overview of the various policies and guidelines adopted in other countries with respect to access to postal services.

### 2.3.1 Letterboxes

The above-mentioned customer perception survey indicated that the majority of those interviewed were satisfied with the current availability of letterboxes (refer to **Table 1** below).

**Table 1:** Level of Satisfaction with the availability of a letterbox where to post letters

	Households	Small Businesses
Very satisfied	58.0%	35.5%
Satisfied	18.5%	30.0%
Neither satisfied nor dissatisfied	9.8%	17.4%
Dissatisfied	7.2%	8.3%
Very dissatisfied	6.5%	7.9%

To determine the most appropriate parameters to ascertain the **minimum** density of public letterboxes by Maltapost the MCA took into consideration access criteria adopted by other countries, Malta's specific geographical and demographic characteristics and the impact on the current provision of public letterboxes within each locality (i.e. the different localities in Malta and Gozo based on the respective local council boundaries).

<sup>42</sup> Refer to <http://www.mca.org.mt/consumercorner/listarticles.asp?consumercornercategoryid=5>.

The MCA is of the view that access criteria based solely on the population or on the area of a particular locality<sup>43</sup> are not useful options to pursue because they do not take into account the population density and distribution of a particular locality. The adoption of such criteria could lead to a significant reduction in letterboxes in some localities and an over provision in others. This could result in an imbalance in the number of letterboxes in localities with a smaller population and larger area coverage, or vice versa. Therefore, the MCA does not recommend that the use of such a criterion on its own be adopted.

Taking into consideration the deficiencies in using the criterion mentioned above, the MCA considered the option of establishing access criteria based on the population density and distribution within the various localities throughout Malta and Gozo, including the maximum distance that anyone should have to travel to reach a letterbox based on the straight-line distance method.<sup>44</sup>

To ensure a proportionate and sustainable network of letterboxes other foreign jurisdictions have established different distances that anyone should have to travel to reach a letterbox based on whether a particular area is classified as an urban or rural area<sup>45</sup> (i.e. the population density of a particular locality). Due to Malta's small geographical size and relatively high population density it is difficult to clearly distinguish between urban and rural areas.<sup>46</sup> Therefore, to differentiate between less and more densely populated areas in Malta, the MCA established a threshold based on whether the population density of a particular locality surpasses or not the country's average population density.<sup>47</sup> This means that persons residing in a locality where the population density is higher than the national average are considered as living in a densely populated locality, whilst persons living in a locality below the national average are considered as living in a less densely populated locality.

To determine the most appropriate maximum distances that one should have to travel to reach a letterbox (depending on whether the population density of each locality is higher or lower than the national average), the MCA took into consideration the distances adopted in other countries,<sup>48</sup> the population density of each locality and the impact on the current letterbox network.<sup>49</sup> To avoid the unnecessary need for a letterbox in very sparsely populated areas within a

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<sup>43</sup> This would imply tying the minimum number of letterboxes that should be present in a particular locality to the population number or area of that locality.

<sup>44</sup> The maximum distance that one would have to travel to reach a particular letterbox is based on the straight-line method. Data to calculate the 'most accessible route' is not available and therefore straight-line distance measurements are used. It is to be noted that straight-line distance measurements do not take into account natural barriers in accessing postal services.

<sup>45</sup> In practice users living in areas which are not densely populated travel further to access the letterbox network and would still consider themselves to have good access to the letterbox network.

<sup>46</sup> Refer to National Statistics Office (NSO) 1995 Census Volume 1 Chapter 5 – These two types of settlements usually have their own specific characteristics and dissimilar population densities. Although locality characteristics and population densities vary from each other, the differences are not such that would facilitate the drawing of distinctions between urban and rural areas.

<sup>47</sup> Malta is the most densely populated EU Member State with an average population density of 1,282 residents per square kilometre – National Statistics Office (NSO) 2006.

<sup>48</sup> As Malta is very densely populated, the distances adopted for rural areas in other jurisdictions were not given a strong weighting. The distances for densely populated areas need to be different from those of less densely populated areas to ensure that the number of access points is proportionate and sustainable.

<sup>49</sup> The MCA considered the impact on the postal letterbox network based on whether the population density of a particular locality surpassed or not the country's average population density.

particular locality the percentage of users or potential users in such areas was also given consideration.<sup>50</sup>

The MCA is also of the opinion that in addition to the criteria mentioned above other factors must also be taken into consideration to meet consumer needs, such as, amongst others, the provision of additional letterboxes in commercial and tourist areas.

### **Proposed Minimum Standards**

The MCA therefore welcomes the views of all interested parties as to the **minimum** standards of service that Maltapost, as the designated USP, should be directed to provide for access to public letterboxes.

Bearing in mind the existing public letterbox network provided by Maltapost and the above-mentioned points, the following proposals are put forward as the basis for this consultation:

- (a) There should be a letterbox as near to each town or village centre as practical from which collection is made six (6) days a week (i.e. Monday to Saturday, excluding public holidays) to secure next day delivery nationwide.<sup>51</sup>
- (b) In addition to the availability of letterboxes as described in (a) above, in localities where the population density is higher than the national average not less than 98% of users or potential users of postal services should be within **400 metres** of a letterbox.
- (c) In addition to the availability of letterboxes as described in (a) above, in localities where the population density is lower than the national average not less than 98% of users or potential users should be within **800 metres** of a letterbox.

The MCA is of the view that the use of such access parameters would ascertain the **minimum** density of letterboxes and allow the network of letterboxes to be equitably distributed, while at the same time balancing the needs of consumers with the necessary safeguards to ensure a proportionate and sustainable public letterbox network.

These access parameters do not preclude Maltapost from the requirement to provide additional public letterboxes, as may be required, to meet consumer needs (such as in the main commercial and tourist areas or where circumstances clearly justify such a requirement). Maltapost should also consult with the local council(s) concerned on the most appropriate distribution of public letterboxes in a particular locality.

Furthermore, it is proposed that the permanent closure or re-siting of any public letterbox should follow the process depicted in **Section 2.3.4** below.

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<sup>50</sup> Although sustainability is less of an issue with letterboxes than with postal outlets, changes in the requirements for letterboxes could have cost implications on Maltapost. There is therefore the need to balance between maximum inclusion against the constraint of such a policy being proportionate.

<sup>51</sup> Refer to **Section 2.3.6** on the frequency and timing of collections to secure next day delivery.

Q1. Do you agree with the minimum requirements with respect to access to letterboxes as proposed by the MCA? If you think that some alternative criteria should apply please state your reasons.

### 2.3.2 Retail Counters

While letterboxes constitute one of the main access points for single piece mail, the USP's retail postal outlets (i.e. branch post offices) and sub-post offices' importance lies in the fact that they are the only access points for the following universal postal services: registered and insured mail, together with parcel post (refer to **Section 2.3.3** regarding access to Bulk Mail).

The MCA notes that post offices and sub-post offices are widely used by large business mailers, small businesses and households alike. In fact as indicated in the customer perception survey commissioned by the MCA, 87% of households and 79.8% of the small businesses interviewed had used post office services during the previous 12 months. **Table 2** shows the level of usage among these three types of consumers.

**Table 2:** Purpose of the usage of the Maltapost's Post Office services/facilities by types of customers<sup>52</sup>

Type of Customer	Post Letters	Buy Stamps	Post Parcels	Register Letters
Large Business Mailers	94.7%	57.9%	52.6%	94.7%
Small businesses	62.1%	68.1%	26.3%	63.6%
Households	70.2%	67.1%	25.6%	47.3%

The results of the respective surveys as shown in **Table 2** above clearly demonstrate the importance of access to post office services and facilities (i.e. basic counter services) for all types of consumers.

Taking into consideration the current availability of post offices and sub-post offices (refer to **Table B.2** in **Appendix B**) and the fact that the large majority of users are satisfied with the services provided,<sup>53</sup> the MCA is of the opinion that the current provision of a basic counter service throughout Malta and Gozo is overall adequate to meet consumer needs.

Therefore, the MCA is proposing that Maltapost should guarantee, as a minimum, not less than fifty-nine (59) postal outlets providing access to an efficient and effective basic counter service (including, amongst others, appropriate queuing

<sup>52</sup> As already mentioned in the document postal outlets are also used by Maltapost to provide services which are not considered as universal postal services. In fact 71% of households and 90% of small businesses indicated that they use postal outlets to pay bills.

<sup>53</sup> The customer perception surveys show that over 90% are satisfied with the services provided by the post offices.

waiting times for access to such services)<sup>54</sup> throughout Malta and Gozo in line with the current distribution of postal outlets.

This means that postal outlets providing a basic counter service may only be permanently closed if another postal outlet providing access to such services is made available. In addition, Maltapost should also strive to provide a basic counter service in every locality throughout Malta and Gozo and as close to the town or village centre as practical.

In addition to the above, it is noted that the permanent closure or re-siting of any current postal outlet should follow the process depicted in **Section 2.3.4** below.

Q2. Do you agree that the current provision and distribution of postal outlets providing access to a basic counter service is sufficient to meet the customers' current and future needs? If you disagree please state why.

### 2.3.3 Bulk Mail Facilities

Bulk mail is essential for the effective functioning of business and commerce in Malta. It is therefore important that access to the bulk mail service is sufficient to meet the needs of the users.

In proposing any policy to be followed by the USP it is important to take into account the opinion of business bulk mailers who are the main users of this type of service. In a customer perception survey commissioned by the MCA in the last quarter of 2006 covering large business mailers, twenty-two (22) out of the twenty-four (24) entities interviewed said they had used the 'bulk mail' service within the last twelve (12) months. A general level of satisfaction was registered with Maltapost's bulk mail service.<sup>55</sup>

As there exists a general level of satisfaction with Maltapost's bulk mail service, access to bulk mail services is available via all postal outlets, and appropriate facilities are available at Maltapost's Bulk Mail Section to cater for large volumes of bulk mail, the MCA is of the opinion that no further provisions need to be proposed in this area.

Q3. Do you agree that the current provision for access to the bulk mail service is sufficient to meet the needs of users? If you disagree please state why.

<sup>54</sup> The MCA notes that Maltapost plans to provide additional services which do not form part of the universal postal services. The MCA will monitor the provision of Maltapost's access to basic counter services, including, amongst others, queuing waiting times, as necessary.

<sup>55</sup> The mean score for level of satisfaction with the service was 2.2 where one (1) stood for very satisfied while five (5) stood for very dissatisfied.

#### 2.3.4 Closure or Re-Siting of Existing Access Points

In line with Maltapost's licence, the MCA is proposing the principles and procedures to be followed by Maltapost for the permanent closure or re-siting of existing access points or the establishment of new access points.

Such principles and procedures are necessary to: ensure that standards are maintained, that there exists sufficient reason to justify the closure or re-siting of existing access points, and that any closure or movement takes account of the current and future needs of customers.<sup>56</sup>

The MCA proposes that prior to the permanent closure or re-siting of a particular access point Maltapost must, at least four (4) weeks in advance, inform the MCA of its intention to permanently close or re-site any existing access point together with:

- the reasons why a particular access point is to be closed or re-sited;
- evidence that the access parameters established for that particular access point are satisfied;
- evidence that it has consulted adequately with the local council(s) concerned on the matter with respect to, amongst others, the most appropriate distribution of the access point(s);<sup>57</sup>
- justification that customers will still have access to meet their needs (such as users in the main residential, commercial and tourist areas); and
- evidence that it has consulted with the Malta Environment and Planning Authority (MEPA) with respect to environmental or planning issues.<sup>58</sup>

The MCA is of the view that should a particular local council disagree with the closure or re-siting of a particular access point, Maltapost may refer the matter to the MCA.<sup>59</sup> The MCA will examine the facts and any representations placed, together with any other information as may be required, and determine whether the removal or re-siting of a postal access point is justified, stating its reasons. This is without prejudice to the need for Maltapost to comply with any reasonable conditions prescribed by any authority having jurisdiction over the road, street or public place as the case may be.

Maltapost must provide adequate notice to the general public of any closure or re-siting of a particular access point and appropriately communicate such a change to the public. In addition, Maltapost must also affix adequate information prior to the closure or re-siting of a particular access point advising the public

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<sup>56</sup> In addition, this is required to ensure that, amongst others, the main commercial, business and tourist areas, remain appropriately served with letterboxes.

<sup>57</sup> Particularly in those localities where the population density is lower than the national average and/or when a particular locality faces specific circumstances that need to be considered.

<sup>58</sup> Maltapost should also consult with MEPA regarding those letterboxes situated within sensitive areas such as Urban Conservation Areas and it must be ensured that permits are in place prior to permanently close or re-site a particular letter box.

<sup>59</sup> It must however be clarified that the access point in question must remain open and Maltapost must continue to provide the same level of service therefrom until all conditions related to the closure or re-siting of an access point are fulfilled by Maltapost.



about such changes and any alternative arrangements (refer to **Section 4** below).

In line with the Regulations<sup>60</sup> and Maltapost’s licence the MCA may request Maltapost to establish any new access point in consultation with Maltapost, users of the service and other stakeholders, as necessary, if consumers do not have appropriate postal access services to meet their needs.<sup>61</sup> In addition, as stated in Maltapost’s licence, access points must be readily accessible to disabled customers.

Q4. Do you agree with the procedure on the permanent closure or re-siting of an existing access point? If you do not agree please state your reasons.

### 2.3.5 Facility to Buy Postage Stamps

As mentioned earlier on in this document stamps can currently be purchased from all postal outlets and through a wide range of retail outlets.

In a customer perception survey commissioned by the MCA, the following results were registered with respect to existing facilities for the purchase of postage stamps:

**Table 3:** Results outlining consumers’ Level of Satisfaction with respect to their ability to buy postage stamps when and where they want.

	Households	Small Businesses
Very satisfied	51.6%	24.3%
Satisfied	16.6%	30.2%
Neither satisfied nor dissatisfied	15.8%	23.3%
Dissatisfied	8.7%	12.6%
Very dissatisfied	7.2%	8.6%

As mentioned above, the Regulations state that the USP must ensure that, where feasible, there is available a facility to buy postage stamps<sup>62</sup> in the vicinity of every letterbox. While noting that the majority of customers are satisfied with the facility to buy postage stamps when and where they want, there are some localities that do not have any stamp vendors (refer to **Table B.3**, in **Appendix B**).

Whilst the MCA believes that it should be left up to Maltapost to make arrangements for the sale of stamps with whichever retail outlet it chooses to deal with, it is also of the opinion that the term ‘vicinity’ mentioned in the Regulations should be defined as being within a 100 metres radius of the nearest

<sup>60</sup> Regulation 12 of the regulations states that the Authority may by directive require the universal service provider to establish post offices at such premises and from such dates as it may determine so as to ensure a basic counter service throughout Malta.

<sup>61</sup> Refer to Maltapost’s licence obligations – Legal Notice 500 of 2004 Regulation 17.4.

<sup>62</sup> Appropriate to the rates for mail in standard envelopes.

retail outlet to the letterbox, which need not be a post office/sub post office and may be automated.<sup>63</sup>

The MCA is of the view that there is already a good match between the current number of letterboxes and stamp sales outlets and such minimum standards should not lead to any increased obligation on Maltapost.<sup>64</sup>

Q5. Do you agree that the term 'vicinity' should be defined as being within a 100 metres radius of the nearest retail outlet to the letterbox, which need not be a post office/sub post office and may be automated? If not please state your reasons.

### 2.3.6 Frequency and Timing of Collections

The customer perception survey carried out by the MCA in the last quarter of 2006 indicated that the majority of households and small businesses are satisfied with the latest collection time from the letterboxes for next day delivery. The same can be said for large business mailers.<sup>65</sup>

**Table 4:** Level of Satisfaction with the latest collection time from the letterboxes for next day delivery

	Households	Small Businesses
Very satisfied	45.8%	23.3%
Satisfied	29.5%	36.9%
Neither satisfied nor dissatisfied	16.5%	28.3%
Dissatisfied	5.5%	6.9%
Very dissatisfied	2.7%	3.6%

The MCA is of the opinion that no changes need to be effected to the frequency and timing of collections from letterboxes as the majority of households and small businesses are satisfied with the present arrangements and enough time is available for Maltapost to carry out the necessary sorting of mail to secure next day delivery.

The MCA is also of the opinion that Maltapost has an adequate system in place to monitor the latest collection time from letterboxes (and other collection points) to ensure next-day delivery. Should issues arise with the QoS of mail and/or any complaints from the users of the service, the MCA may request information from Maltapost regarding variations, if any, from the official collection time and the reason for these variations. This would further assist the MCA in monitoring Maltapost's QoS obligations.

<sup>63</sup> A facility where postage stamps are sold does not necessarily entail a physical retail outlet but could also be an automatic stamp vending machine.

<sup>64</sup> As shown in tables B.1 (number of letterboxes per locality) and B.3 (number of stamp vendors per locality) in Appendix B the total number of public letterboxes is 468 and the total number of stamp vendors is 456.

<sup>65</sup> In fact in a scale from 1 (very satisfied) to 5 (very dissatisfied) the mean level of satisfaction for large business mailers stood at 2.7.

Q6. Do you agree that no changes are required to the current collection time from street letterboxes to ensure next day delivery? If you disagree please state why.

### 3. Guarantee of Daily Delivery

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Collection and delivery form the basis of the universal postal service, as they are essential for the USP to secure its daily delivery obligation. This section discusses Maltapost's obligation with respect to the guarantee of the daily delivery of postal articles to addressees.

#### 3.1 Legislative Backdrop

As stated in Article 17(4) of the Act the collection and delivery of postal articles are to take place on every working day and not less than five days a week. Regulation 17.1 of Maltapost's licence states that Maltapost shall provide on 'every working day at least one (1) delivery to each postal address or other delivery point and at least one (1) collection from each current access point or as may be agreed to with the Authority from time to time; provided that the delivery and collection shall apply to all postal articles which are not dangerous and illegal and which weigh up to 20 kilograms.'

Article 39 of the Act gives the power to the Authority to 'give directives establishing the manner and times in which postal articles shall be posted and delivered'.

#### 3.2 Maltapost's Current Delivery Arrangements

Standard single piece letters are posted in consumers' letterboxes, whereas parcels and registered items must be delivered personally, either because they are too large to fit through the aperture of the consumer's letterbox<sup>66</sup> or because the person sending the item requires proof of delivery such as in the case of registered and insured articles.

All postal items, except bulky packets and parcels, are delivered daily throughout Malta and Gozo between 09:00hrs to 14:00hrs. Bulky packets and parcels are delivered daily between 07:00hrs and 19:00hrs (delivery may continue for longer periods depending on the daily volume of work).

For parcels and registered items it is not always the case that there is someone at home to accept the postal article when the post-person calls. In these cases a notice is left stating that an attempt was made at delivery, and stating how the addressee can obtain the postal item.<sup>67</sup>

The addressee is given the option of collecting the item from the closest postal outlet within a specified period and during specified hours<sup>68</sup>, or to arrange for

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<sup>66</sup> Refer to Maltapost's Postal Service Postal and Delivery Requirements Schemes for the recommended dimensions of a consumer's letterbox or letter plate and the location of such letterbox or letter plate for the respective premises and apartments.

Postal and Delivery Requirements Scheme (on-line) :  
<http://www.maltapost.com/filebank/Schemes/Posting%20and%20Delivery%20Requirements%20Scheme.pdf>

<sup>67</sup> In the case of registered mail additional delivery attempts are made to the addressee.

<sup>68</sup> A request can also be made via Maltapost's website for a registered item or bulky packet to be collected from a specified Maltapost retail counter. A customer care officer then contacts the customer and advises him/her on the date and time he/she may collect the item from the chosen retail outlet.

another delivery subject to the payment of a reasonable fee and at a time agreed to with the addressee.<sup>69</sup>

### 3.3 Proposed Direction to Maltapost

The customer perception survey commissioned by the MCA shows that there is a general level of satisfaction with the time postal items are delivered. The results are portrayed in more detail in **Table 5** below.

**Table 5:** Level of Satisfaction with the time the post is delivered each day

	Households	Small Businesses
Very satisfied	69.0%	36.9%
Satisfied	17.0%	36.0%
Neither satisfied nor dissatisfied	8.6%	18.1%
Dissatisfied	3.9%	5.0%
Very dissatisfied	1.5%	3.1%

The MCA is of the opinion that deliveries should be structured by the USP in such a way as to meet the requirements of a majority of its customers and in the most economical way. The conflicting demands of different groups of customers make it impossible to specify an acceptable delivery span that has to be achieved in all cases.

As the customer perception survey indicated that that there is a high level of satisfaction with the time post is delivered each day (inc. registered mail and parcel post services), the MCA is of the opinion that there is no reason to change the current delivery arrangements. The same can be said for the fact that the USP delivers mail on each working day (i.e. six days a week).

Q7. Do you agree that the current delivery arrangements should be left as they are? If not, please state your reasons.

<sup>69</sup> Delivery to the client's address or otherwise as instructed is done by Maltapost between 08:00 hrs and 19:00 hrs at a charge payable on delivery.

## 4. Publication of Information

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Users of the universal postal service need to know exactly what they have a right to expect in terms of price, quality, service standards, and the conditions relating to the particular services falling under the universal service.

Maltapost, as the USP, is required to provide users with regular, detailed and up to date information about the universal postal service. This section addresses the information that should be provided and the media that should be used.

### 4.1 Legislative Backdrop

Article 19(1) of the Act states that 'the universal service provider shall provide users with regular, detailed and up to date information on the particular features of the universal service, with special reference to the general conditions of access to the service, as well as to prices and quality standard levels'. Article 19 (2) further states that information shall be published at least annually in a manner that is satisfactory to the Authority.

The Regulations state that the USP shall publish the following information, once every calendar year, ensuring also reasonable publicity:

- the location of all access points including each of its post offices and letterboxes;
- the times of opening and closing of each of its post offices and times of collection and delivery;
- a contingency plan setting out the measures to be taken by the USP to ensure, as far as practicable the provision of the universal postal service in the event of an industrial action, emergency or natural disaster; and
- the arrangements it has established or intends to establish to ensure that its post offices, including its letterboxes, are accessible to persons with disabilities.<sup>70</sup>

Maltapost's licence<sup>71</sup> further states that Maltapost is required to publish prices for universal postal services as public tariffs.

### 4.2 Information Provided by Maltapost

Maltapost currently provides information on universal postal services through the following channels of communication and publications:

- Maltapost's customer care office and retail counters;
- A booklet entitled 'Committed to Deliver' that is available for reference at all of Maltapost's retail counters and is also available on Maltapost's website;<sup>72</sup>

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<sup>70</sup> Refer to Regulation 42 (1) – (3) of the Regulations.

<sup>71</sup> Refer to Maltapost Licence Regulation 17.2.

<sup>72</sup> This booklet contains information on the: release and delivery of incoming parcels, service agreements, registering of 'high risk' items, advice and information on packaging and posting, compensation and how this should be claimed, compensation for loss, damage, delay or failure to

- Maltapost’s website - [www.maltapost.com](http://www.maltapost.com);
- Press releases through which Maltapost informs the public on the temporary closure and re-opening of its access facilities and change in working hours as specified in the MCA’s Decision 1 of 2006;
- A quarterly newsletter delivered to every household in Malta and Gozo;
- Postal Service Schemes that contain information and conditions on postal services on offer;<sup>73</sup>
- Advertisements on local newspapers, television and radio stations;
- Plates found on Maltapost’s public letterboxes indicating the days when mail is collected and the last collection time, the Customer Care Help Line, the Code Number of that particular street letterbox, and advice to the public that postal articles containing valuables must be sent by registered post.

The above-mentioned postal customer perception surveys indicated that customers are generally satisfied with the information currently being provided by the USP. The results are being portrayed in more detail in **Table 6** below.

**Table 6:** Level of Satisfaction with the information available about the services provided by Maltapost

	Households	Small Businesses
Very satisfied	38.6%	16.2%
Satisfied	35.0%	35.7%
Neither satisfied nor dissatisfied	18.4%	32.6%
Dissatisfied	5.7%	11.4%
Very dissatisfied	2.4%	3.1%

Notwithstanding the fact that a general level of satisfaction was registered with respect to the information provided by Maltapost about the universal postal services and Maltapost is already, in the main, fulfilling its obligations in a number of areas, the MCA is of the opinion that the provisions found in the legislation still need to be delineated in further detail in order to safeguard the universal postal service. The MCA is also making other proposals in those areas where it feels that Maltapost can register further improvements in the provision of information.

### 4.3 Proposed Direction to Maltapost

The MCA’s Decision Notice on Maltapost’s Quality of Service (QoS) Requirements published in 2005 established the QoS information that should be made available at the following locations and through the following media:

- at the point of posting;

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achieve set standards, how to lodge an enquiry / complaint, categories of complaints, Maltapost’s commitment to address these complaints, and other forms of redress.

<sup>73</sup> Refer to Maltapost’s Postal Service Schemes - <http://www.maltapost.com/page.asp?p=9472&l=1>.

- by way of notice at all post offices;
- in written form at all post offices for subsequent reference at home or business premises;
- in written format at selected post offices, or on request by post, for subsequent reference at home or business premises;
- over the internet;
- through advertising media; and
- in the Company's annual report.<sup>74</sup>

The MCA is of the opinion that the same locations and media mentioned above should be used for the provision of information related to all elements of the universal postal service (such as information on prices, the location of all its access points, the times of opening and closing of each of its post offices / sub-post offices, the times of collection from access points and the times of delivery of postal items).<sup>75</sup>

Q8. Do you agree that the same publication of information requirements of QoS standards should be extended to all elements of the universal service area?

#### 4.3.1 Postal Service Schemes

Postal service schemes regulate the commercial relationship between the USP and the customer. In fact the USP's products or services have the charges, terms and conditions detailed within these 'schemes' that are regulated under the Regulations.<sup>76</sup> Under these Regulations a scheme made in accordance with the Regulations shall portray the:

- charges which are to be imposed in respect of the postal services concerned;
- other terms and conditions which are to be applicable to the postal services concerned; and the
- procedures for dealing with the complaints of persons who use the postal services concerned, including the compensation that may be awarded accordingly.<sup>77</sup>

The MCA is of the opinion that a postal service scheme should:

<sup>74</sup> MCA (2005), Maltapost plc – Quality of Service Requirements Decision Notice, Page 25: <http://www.mca.org.mt/infocentre/openarticle.asp?id=667&pref=18>.

<sup>75</sup> Refer to Regulation 42 of the Regulations.

<sup>76</sup> Regulation 43 (5) of the Regulations states that: any obligations undertaken by the universal service provider made in accordance with this regulation shall bind the universal service provider as if such obligations form part of the terms and conditions of a contract at law, and may be enforced against the universal service provider accordingly.

<sup>77</sup> Refer Regulation 43(2) of the Regulations.



- be available in both Maltese and English;
- be clear and easily understood and have clear and unambiguous provisions (complete, consistent, clear and concise);
- include all the information needed by a customer to make an intelligent decision to purchase and use the service (or product) needed without any other assistance; and
- follow a format that makes sense and appeals to the broadest cross-section of readers.

The Regulations state that 'a scheme or any amendments to a scheme under this regulation shall be forwarded to the Authority which shall ensure that the USP at its expense gives such publicity to the scheme or any amendments thereto as the Authority may consider appropriate.<sup>78</sup> The MCA is of the opinion that postal service schemes should be appropriately published so that:

- the customer can make an informed choice; and that
- special criteria which need to be met in advance of availing of the service are fully complied with.

The MCA is of the opinion that Maltapost must ensure that postal service schemes together with any amendments and/or updates are made available:

- in written form at all post offices for subsequent reference at home or business premises;
- in written form at selected post offices or on request by post, for subsequent reference at home or business premises;
- over the internet; and
- through advertising media such as for example the USP's quarterly newsletter.

The MCA is to be kept informed of any changes and/or amendments to a postal service scheme. In addition, it is proposed that Maltapost must submit to the MCA on an annual basis and not later than twenty (20) working days from the end of each financial year, a list of all current postal service schemes together with a link to the web address depicting the scheme and a summary of any significant changes and/or amendments carried out during the year.

Q9. Do you agree with the criteria that have been included here for the publishing of postal service schemes? Are there any more criteria that should be included?

Q10. Besides the criteria listed, should the MCA establish a more precise format for the publishing of postal service schemes?

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<sup>78</sup> Refer to Regulation 43(4) of the Regulations.

Q11. Do you agree with the instruments that have been listed here for the publishing of postal service schemes? Are they adequate, or are there any other media that can be used?

#### 4.3.2 Information on Access Points

Maltapost provides facilities on its website to search for information regarding its postal access points such as searching for the nearest letterbox and USP post office.

The MCA is of the opinion that similar facilities should also be provided to allow users to search for the nearest stamp vendor and sub-post office. In addition, the MCA is of the opinion that besides giving information on the address of a particular access point, all postal access points should be geographically mapped out and appropriately displayed on Maltapost's website and in postal outlets.

Q12. Do you agree with the measures proposed with respect to the information to be provided on access points? If not please state your reasons.

Q13. Is there any other information, which Maltapost may be required to publish with respect to access to universal services?

#### 4.3.3 Information on Post Codes

Postcodes are important not only to ensure that the postal item can be delivered to the person for which it is intended, but also in ensuring the quality of service in terms of timely delivery. This is because as a unique, universal identifier, it unambiguously identifies the addressee's locality and assists in the transmission and sorting of mail items.

The Regulations state that 'the universal service provider shall submit to the Authority updated lists of postcodes and shall publish them in a manner that ensures reasonable publicity including but not limited to affixation on the notice board of each of its post offices.'<sup>79</sup>

A new post code system was recently introduced by Maltapost, the main reasons being to: (a) facilitate patterns and procedures of mail distribution; (b) offer conformity and consistency to its clients; and (c) have a post code which will be manageable for future modifications.

Maltapost's new postcode system was introduced in December 2006 through a communication sent to each dwelling. Maltapost also introduced an on-line directory of postcodes for all delivery points on its website. Letters to households and commercial establishments were mailed towards the end of 2006 as reminders to clients about their new postcodes. In addition, customers can seek information through Maltapost's customer care section, retail outlets or via e-mail.

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<sup>79</sup> Refer Regulation 15(2) of the Regulations.

The MCA is of the opinion that the current provision of information with respect to postcodes is adequate to meet consumer needs.

Q14. Do you agree that the current provision of information with respect to postcodes is adequate to meet consumer needs? If you disagree, please state your reasons.

#### **4.3.4 Additional Information**

The MCA would be interested to receive the views of interested parties as to whether Maltapost should be required to publish any other information about the universal service.

Q15. Is there any other information that Maltapost should be required to publish in respect of the Universal Service? Please give your reasons.

## 5. Submission of Comments

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The consultation period will run from **4<sup>th</sup> April 2008** to **30<sup>th</sup> May 2008** during which the MCA welcomes written comments on any of the issues raised in this consultation document.

Having analysed and considered the comments received, the MCA will review the various proposals with respect to the areas of the universal service examined here and publish its decision that will, inter alia, summarise the responses to the consultation.

Receipt of comments will be acknowledged. Comments will be made publicly available by the MCA and on the MCA's website unless declared confidential. Respondents are therefore asked to separate out any confidential material into a clearly marked annex.

Respondents are also kindly requested to preferably refer their comments to the numbered consultative questions. Respondents may also make comments on any aspect of the consultation by referring to the specific sections of this document when making their submissions.

All responses to this consultation should be clearly marked 'Maltapost's Universal Service Obligations – Accessibility, Daily Delivery, Provision of Information' and sent by post, facsimile or e-mail to:

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Valletta Waterfront  
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## Appendix A - Consultation Questions

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Q1. Do you agree with the minimum requirements with respect to access to letterboxes as proposed by the MCA? If you think that some alternative criteria should apply please state your reasons.

Q2. Do you agree that the current provision and distribution of postal outlets providing access to a basic counter service is sufficient to meet the customers' current and future needs? If you disagree please state why.

Q3. Do you agree that the current provision for access to the bulk mail service is sufficient to meet the needs of users? If you disagree please state why.

Q4. Do you agree with the procedure on the permanent closure or re-siting of an existing access point? If you do not agree please state your reasons.

Q5. Do you agree that the term 'vicinity' should be defined as being within a 100 metres radius of the nearest retail outlet to the letterbox, which need not be a post office/sub post office and may be automated? If not please state your reasons.

Q6. Do you agree that no changes are required to the current collection time from street letterboxes to ensure next day delivery? If you disagree please state why.

Q7. Do you agree that the current delivery arrangements should be left as they are? If not, please state your reasons.

Q8. Do you agree that the same publication of information requirements of QoS standards should be extended to all elements of the universal service area?

Q9. Do you agree with the criteria that have been included here for the publishing of postal service schemes? Are there any more criteria that should be included?

Q10. Besides the criteria listed, should the MCA establish a more precise format for the publishing of postal service schemes?

Q11. Do you agree with the instruments that have been listed here for the publishing of postal service schemes? Are they adequate, or are there any other media that can be used?

Q12. Do you agree with the measures proposed with respect to the information to be provided on access points? If not please state your reasons.

Q13. Is there any other information, which Maltapost may be required to publish with respect to access to universal services?

Q14. Do you agree that the current provision of information with respect to postcodes is adequate to meet consumer needs? If you disagree, please state your reasons.

Q15. Is there any other information that Maltapost should be required to publish in respect of the Universal Service? Please give your reasons.

## Appendix B – Tables

**Table B.1: Current Provision of Public Letterboxes in relation to Total Population, Population Density And Area**

Locality	Population <sup>80</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Public Letterboxes <sup>81</sup>	No of public letterboxes per 1,000 of population	No of public letterboxes per km <sup>2</sup>
Attard	10,186	1,534	6.64	9	0.88	1.36
Balzan	3,859	6,465	0.60	6	1.55	10.00
Birgu (Vittoriosa)	2,691	5,132	0.52	5	1.86	9.62
Birkirkara	21,775	7,941	2.74	16	0.73	5.84
Birzebbuga	8,668	941	9.21	7	0.81	0.76
Bormla (Cospicua)	5,642	6,215	0.91	8	1.42	8.79
Dingli	3,326	587	5.67	6	1.80	1.06
Fgura	11,276	9,868	1.14	7	0.62	6.14
Floriana	2,246	2,381	0.94	5	2.23	5.32
Gharghur	2,389	1,855	2.02	2	0.84	0.99
Ghaxaq	4,388	1,139	3.85	6	1.37	1.56
Gudja	2,901	1,289	2.25	5	1.72	2.22
Gzira	7,086	7,289	0.97	9	1.27	9.28
Hamrun	9,513	9,028	1.05	8	0.84	7.62
Iklin	3,203	1,855	1.73	2	0.62	1.16

<sup>80</sup> NSO (2006), *Census of Population and Housing. Preliminary Report*, 10-11 (on-line): <http://www.census2005.gov.mt/english/reports.htm>

<sup>81</sup> Private letterboxes (such as those found in hotels) were not taken into consideration, as they are not deemed to be part of the universal service obligation.

Locality	Population <sup>80</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Public Letterboxes <sup>81</sup>	No of public letterboxes per 1,000 of population	No of public letterboxes per km <sup>2</sup>
<b>Malta</b>						
Isla (Senglea)	3,083	19,293	0.16	3	0.97	18.75
Kalkara	2,871	1,632	1.76	4	1.39	2.27
Kirkop	2,183	1,914	1.14	4	1.83	3.51
Lija	2,779	2,537	1.10	4	1.44	3.64
Luqa	6,028	896	6.72	11	1.82	1.64
Marsa	5,389	1,955	2.76	7	1.30	2.54
Marsascala	9,298	1,730	5.38	7	0.75	1.30
Marsaxlokk	3,205	680	4.71	3	0.94	0.64
Mdina	258	291	0.89	1	3.88	1.12
Mellieha	7,549	333	22.64	13	1.72	0.57
Mgarr	2,995	186	16.12	3	1.00	0.19
Mosta	18,676	2,755	6.78	15	0.80	2.21
Mqabba	3,021	1,161	2.6	2	0.66	0.77
Msida	7,623	4,485	1.7	11	1.44	6.47
Mtarfa	2,396	3,299	0.73	3	1.25	4.11
Naxxar	11,947	1,032	11.57	10	0.84	0.86
Paola	8,856	3,546	2.5	10	1.13	4.00
Pembroke	2,916	1,266	2.3	2	0.69	0.87
Pieta	3,853	8,532	0.45	5	1.3	11.11
Qormi	16,576	3,296	5.03	17	1.03	3.38
Qrendi	2,525	515	4.9	3	1.19	0.61

Locality	Population <sup>80</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Public Letterboxes <sup>81</sup>	No of public letterboxes per 1,000 of population	No of public letterboxes per km <sup>2</sup>
Rabat	11,462	431	26.60	20	1.74	0.75
Safi	1,948	853	2.28	2	1.03	0.88
San Giljan	7,667	4,765	1.61	12	1.57	7.45
San Gwann	12,630	4,825	2.62	14	1.11	5.34
San Pawl –il Bahar	13,619	937	14.53	20	1.47	1.38
Santa Lucija	3,174	4,394	0.72	4	1.26	5.56
Santa Venera	6,087	6,721	0.91	8	1.31	8.79
Siggiewi	7,903	398	19.88	8	1.01	0.40
Sliema	12,993	10,026	1.3	18	1.39	13.85
Swieqi	8,099	2,653	3.05	6	0.74	1.97
Tarxien	7,608	8,675	0.88	7	0.92	7.95
Ta' Xbiex	1,846	6,324	0.29	3	1.63	10.34
Valetta	6,315	7, 510	0.84	18	2.85	21.43
Xghajra	1,234	1,278	0.97	2	1.62	2.06
Zabbar	14,694	2,747	5.35	10	0.68	1.87
Zebbug	11,290	1,304	8.66	13	1.15	1.50
Zejtun	11,425	2,129	5.37	12	1.05	2.23
Zurrieq	9,816	1,161	8.46	5	0.51	0.59
<b>Gozo</b>						
Fontana	846	183	4.63	1	1.18	0.22
Ghajnsielem	2,580	516	5.00	3	1.16	0.60
Gharb	1,160	211	5.49	3	2.59	0.55



Locality	Population <sup>80</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Public Letterboxes <sup>81</sup>	No of public letterboxes per 1,000 of population	No of public letterboxes per km <sup>2</sup>
Ghasri	417	148	2.82	2	4.80	0.71
Kercem	1,654	3,492	0.47	3	1.81	6.38
Munxar	1,019	352	2.90	2	1.96	0.69
Nadur	4,181	553	7.56	4	0.96	0.53
Qala	1,609	211	7.62	3	1.86	0.39
Victoria	6,414	1,795	3.57	9	1.40	2.52
San Lawrenz	599	132	4.53	2	3.34	0.44
Sannat	1,729	449	3.85	2	1.16	0.52
Xaghra	3,960	552	7.18	5	1.26	0.70
Xewkija	3,115	434	7.17	5	1.61	0.70
Zebbug	1,770	302	5.86	3	1.69	0.51
<b>Total Number of Public Letter Boxes</b>				<b>468</b>		

**Table B.2: Retail Counters and Sub-post offices divided by demographic areas as defined by Maltapost for operational purposes.**

Locality	Population <sup>82</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Maltapost retail counters/ Branch Post Offices	Sub-post offices
<b>Malta</b>					
<b>Area 1</b>					
Balzan	3,859	6,465	0.60	1	
Attard	10,186	1,534	6.64		
Lija	2,779	2,537	1.10		
Iklin	3,203	1,855	1.73		1
<b>Total</b>	<b>20,027</b>	<b>1989</b>	<b>10.07</b>		
<b>Area 2</b>					
Birkirkara	21,775	7,941	2.74	1	4
Santa Venera	6,087	6,721	0.91		
<b>Total</b>	<b>27,862</b>	<b>7,633</b>	<b>3.65</b>		
<b>Area 3</b>					
Birzebbuga	8,668	941	9.21	1	
<b>Area 4</b>					
Bormla (Cospicua)	5,642	6,215	0.91	1	
Birgu (Vittoriosa)	2,691	5,132	0.52		1
Kalkara	2,871	1,632	1.76		
Isla (Senglea)	3,083	19,293	0.16		
<b>Total</b>	<b>14,287</b>	<b>4,265</b>	<b>3.35</b>		
<b>Area 5</b>					
Gzira	7,086	7,289	0.97	1	
<b>Area 6</b>					
Hamrun	9,513	9,028	1.05	1	
Marsa	5,389	1,955	2.76	1 <sup>83</sup>	
<b>Totals</b>	<b>14,902</b>	<b>3,911</b>	<b>3.81</b>		
<b>Area 7</b>					

<sup>82</sup> NSO (2006), Census of Population and Housing. Preliminary Report, 10-11 (on-line): <http://www.census2005.gov.mt/english/reports.htm>

<sup>83</sup> This is the one found at the Maltapost Head Office.

Locality	Population <sup>82</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Maltapost retail counters/ Branch Post Offices	Sub-post offices
Luqa	6,028	896	6.72	2 <sup>84</sup>	
<b>Area 8</b>					
Mellieha	7,549	333	22.64	1	1
<b>Area 9</b>					
Mosta	18,676	2,755	6.78	1	
Mgarr	2,995	186	16.12		1
<b>Totals</b>	<b>21,671</b>	<b>946</b>	<b>22.9</b>		
<b>Area 10</b>					
Msida	7,623	4,125	1.70	1	
Pietà	3,853	9,592	0.45		
Ta' Xbiex	1,846	6,035	0.29		1
<b>Totals</b>	<b>13,322</b>	<b>5,460</b>	<b>2.44</b>		
<b>Area 11</b>					
Naxxar	11,947	1,032	11.57	1	
Gharghur	2,389	1,855	2.02		1
<b>Totals</b>	<b>14,336</b>	<b>1,054</b>	<b>13.59</b>		
<b>Area 12</b>					
Paola	8,856	3,546	2.5	1	
Santa Lucija	3,174	4,394	0.72		1
Fgura	11,276	9,868	1.14		1
Tarxien	7,608	8,675	0.88		1
<b>Totals</b>	<b>30,914</b>	<b>5,900</b>	<b>5.24</b>		
<b>Area 13</b>					
Qormi	16,576	3,296	5.03	1	
Siggiewi	7,903	398	19.88		1
<b>Totals</b>	<b>24,479</b>	<b>983</b>	<b>24.91</b>		
<b>Area 14</b>					
Rabat	11,462	431	26.60	1	
Dingli	3,326	587	5.67		1

<sup>84</sup> This includes the one found at the Malta International Airport (MIA).

Locality	Population <sup>82</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Maltapost retail counters/ Branch Post Offices	Sub-post offices
Mtarfa	2,396	3,299	0.73		
Mdina	258	291	0.89		
<b>Totals</b>	<b>17,442</b>	<b>515</b>	<b>33.89</b>		
<b>Area 15</b>					
San Gwann	<b>12,630</b>	<b>4,825</b>	<b>2.62</b>	1	1
<b>Area 16</b>					
Sliema	<b>12,993</b>	<b>10,026</b>	<b>1.3</b>	1	1
<b>Area 17</b>					
San Giljan	7,667	4,765	1.61	1	
Swieqi	8,099	2,653	3.05		
Pembroke	2,916	1,266	2.3		
<b>Totals</b>	<b>18,682</b>	<b>2,684</b>	<b>6.96</b>		
<b>Area 18</b>					
San Pawl –il Bahar	<b>13,619</b>	<b>937</b>	<b>14.53</b>	2 <sup>85</sup>	1 <sup>86</sup>
<b>Area 19</b>					
Valletta	6,315	7,510	0.84	2	
Floriana	2,246	2,381	0.94		
<b>Totals</b>	<b>8,561</b>	<b>4,810</b>	<b>1.78</b>		
<b>Area 20</b>					
Zabbar	14,694	2,747	5.35	1	
Marsascala	9,298	1,730	5.38		1
Xghajra	1,234	1,278	0.97		
<b>Totals</b>	<b>25,226</b>	<b>2,156</b>	<b>11.7</b>		
<b>Area 21</b>					
Zebbug	<b>11,290</b>	<b>1,304</b>	<b>8.66</b>	1	
<b>Area 22</b>					
Zejtun	11,425	2,129	5.37	1	

<sup>85</sup> This includes also the one found at Qawra.

<sup>86</sup> This is found in Bugibba.

Locality	Population <sup>82</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Maltapost retail counters/ Branch Post Offices	Sub-post offices
Ghaxaq	4,388	1,139	3.85		1
Gudja	2,901	1,289	2.25		
Marsaxlokk	3,205	680	4.71		1
<b>Totals</b>	<b>21,919</b>	<b>1,355</b>	<b>16.18</b>		
<b>Area 23</b>					
Zurrieq	9,816	1,161	8.46	1	
Kirkop	2,183	1,914	1.14		
Safi	1,948	853	2.28		
Qrendi	2,525	515	4.9		1
Mqabba	3,021	1,161	2.6		1
<b>Totals</b>	<b>19,493</b>	<b>1006</b>	<b>19.38</b>		
<b>Gozo</b>					
<b>Area 24</b>					
Victoria	6,414	1,795	3.57	1	
Sannat	1,729	449	3.85		
Munxar	1,019	352	2.90		1 <sup>87</sup>
Xewkija	3,115	434	7.17		1
Kercem	1,654	3,492	0.47		
Fontana	846	183	4.63		
<b>Totals</b>	<b>14,777</b>	<b>654</b>	<b>22.59</b>		
<b>Area 25</b>					
Ghajnsielem	2,580	516	5.00	1	
Qala	1,609	211	7.62		1
<b>Totals</b>	<b>4,189</b>	<b>332</b>	<b>12.62</b>		
<b>Area 26</b>					
Gharb	1,160	211	5.49	1	
Zebbug	1,770	302	5.86		
Ghasri	417	148	2.82		
San Lawrenz	599	132	4.53		1
<b>Totals</b>	<b>3,946</b>	<b>211</b>	<b>18.7</b>		

<sup>87</sup> This is found in Xlendi, but as the classification is according to the local council localities, it has been listed under the local council under which it falls i.e. Munxar.

Locality	Population <sup>82</sup>	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Maltapost retail counters/ Branch Post Offices	Sub-post offices
<b>Area 27</b>					
Nadur	<b>4,181</b>	<b>553</b>	<b>7.56</b>	1	
<b>Area 28</b>					
Xaghra	<b>3,960</b>	<b>552</b>	<b>7.18</b>	1	
<b>Total Post Offices / Sub-Post Offices</b>				<b>32</b>	<b>27</b>

**Table B.3: Number of Outlets per locality selling postage stamps**

Locality	Population	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Number of Stamp Vendors <sup>88</sup>
Attard <sup>89</sup>	10,186	1,534	6.64	11
Balzan	3,859	6,465	0.60	4
Birgu (Vittoriosa)	2,691	5,132	0.52	2
Birkirkara	21,775	7,941	2.74	23
Birzebbuga	8,668	941	9.21	8
Bormla (Cospicua)	5,642	6,215	0.91	3
Dingli	3,326	587	5.67	5
Fgura	11,276	9,868	1.14	8
Floriana	2,246	2,381	0.94	8
Gharghur	2,389	1,855	2.02	2
Ghaxaq	4,388	1,139	3.85	5
Gudja	2,901	1,289	2.25	2
Gzira	7,086	7,289	0.97	7
Hamrun	9,513	9,028	1.05	11
Iklin	3,203	1,855	1.73	3
Isla (Senglea)	3,083	19,293	0.16	1
Kalkara	2,871	1,632	1.76	-
Kirkop	2,183	1,914	1.14	2
Lija	2,779	2,537	1.10	5
Luqa <sup>90</sup>	6,028	896	6.72	5
Marsa	5,389	1,955	2.76	5
Marsascula	9,298	1,730	5.38	7
Marsaxlokk	3,205	680	4.71	3
Mdina	258	291	0.89	2
Mellieha	7,549	333	22.64	18
Mgarr <sup>91</sup>	2,995	186	16.12	4
Mosta	18,676	2,755	6.78	14
Mqabba	3,021	1,161	2.6	1
Msida	7,623	4,125	1.70	11
Mtarfa	2,396	3,299	0.73	-
Naxxar	11,947	1,032	11.57	8
Paola	8,856	3,546	2.5	11
Pembroke <sup>92</sup>	2,916	1,266	2.3	5

<sup>88</sup> This number includes also the USO's retail outlets and sub-post offices.

<sup>89</sup> This includes also a stamp vendor found at Ta' Qali.

<sup>90</sup> This includes also the stamp vendor found at the Malta International Airport.

<sup>91</sup> This also includes the stamp vendor found in Zebbiegh.

Locality	Population	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Number of Stamp Vendors <sup>88</sup>
Pietà	3,853	9,592	0.45	1
Qormi	16,576	3,296	5.03	14
Qrendi	2,525	515	4.9	4
Rabat	11,462	431	26.60	13
Safi	1,948	853	2.28	2
San Giljan <sup>93</sup>	7,667	4,765	1.61	19
San Gwann	12,630	4,825	2.62	10
San Pawl –il Bahar <sup>94</sup>	13,619	937	14.53	23
Santa Lucija	3,174	4,394	0.72	2
Santa Venera	6,087	6,721	0.91	4
Siggiewi	7,903	398	19.88	8
Sliema	12,993	10,026	1.3	32
Swieqi	8,099	2,653	3.05	4
Ta' Xbiex	1,846	6,035	0.29	4
Tarxien	7,608	8,675	0.88	6
Valetta	6,315	7, 510	0.84	26
Xghajra	1,234	1,278	0.97	1
Zabbar	14,694	2,747	5.35	10
Zebbug	11,290	1,304	8.66	9
Zejtun	11,425	2,129	5.37	6
Zurrieq	9,816	1,161	8.46	8
<b>Gozo</b>				
Fontana	846	183	4.63	-
Ghajnsielem	2,580	516	5.00	2
Gharb	1,160	211	5.49	1
Ghasri	417	148	2.82	-
Kercem <sup>95</sup>	1,654	3,492	0.47	2
Munxar <sup>96</sup>	1,019	352	2.90	4
Nadur	4,181	553	7.56	6
Qala	1,609	211	7.62	3
Victoria	6,414	1,795	3.57	10
San Lawrenz	599	132	4.53	2

<sup>92</sup> This includes also the 3 stamp vendors of St. Andrews and the 1 stamp vendor found at Ta' L-Ibragg.

<sup>93</sup> In this area have been included also the 7 stamp vendors found in Paceville.

<sup>94</sup> This includes the 13 stamp vendors of Qawra and the one stamp vendor found in Salina.

<sup>95</sup> This also includes a stamp vendor found in the hamlet of Santa Lucija.

<sup>96</sup> This includes also the 3 stamp vendors found in Xlendi.



Locality	Population	Population Density (Persons per km <sup>2</sup> )	Area (km <sup>2</sup> )	Number of Stamp Vendors <sup>88</sup>
Sannat	1,729	449	3.85	1
Xaghra	3,960	552	7.18	10
Xewkija	3,115	434	7.17	5
Zebbug	1,770	302	5.86	-
<b>Total</b>				<b>456</b>

**Table B.4: Policies Adopted in Other Countries re Access Points**

<p><b>Belgium</b></p>	<ul style="list-style-type: none"> <li>• La Poste has to guarantee a minimum of one post office for each of the '589' communes. An exception is made in cases of low volumes and/or usage by customers. Notwithstanding this fact, the total of such exceptions where a postal point is the unique point of service cannot exceed 5% of the total 'communes'. Additionally, the number of such exceptions within the same Region cannot exceed sixty percent of this percentage.</li> <li>• For each Postal Office offering a selection of basic services, there must be one Post Office offering a complete set of services within a distance of <b>10km</b> by road.</li> <li>• In order to <b>remove a postal point</b> which is more than <b>5km</b> away from the nearest postal point, La Poste shall consult with the Local Authorities for a period of one month, and in the absence of any objections shall be able to proceed with its removal.</li> </ul>
<p><b>Bulgaria</b></p>	<ul style="list-style-type: none"> <li>• <b>Post Offices</b> with the status of post stations for the main postal operator shall be located in: <ul style="list-style-type: none"> <li>(a) <b>towns</b> with a population of more than 3,000 residents;</li> <li>(b) <b>villages</b> with a population of more than 800 residents.</li> </ul> <p>Other forms of service should be provided in places with a population of fewer than 800 residents.</p> </li> <li>• <b>Post Boxes</b> shall be installed in prominent and publicly accessible places. Moreover, there is a criteria on how post boxes should be located mainly: <ul style="list-style-type: none"> <li>(a) There should be at least one post box in a place of up to 2,000 residents.</li> <li>(b) There should be at least one post box for every 2,000 residents in places of population from 2,000 to 10,000 residents.</li> <li>(c) There should be at least one post box for every 3,000 residents in places of population from 10,000 to 50,000 residents;</li> <li>(d) There should be at least one post box for every 5,000 residents in places of population of more than 50,000 residents.</li> </ul> </li> </ul>
<p><b>Czech Republic</b></p>	<ul style="list-style-type: none"> <li>• The USP is required to maintain a collection letterbox in <b>750 metres</b> reach from every building in municipalities of more than 10,000 inhabitants. In smaller municipalities (1,000 to 10,000 inhabitants), the USP is required to have at least one letterbox per 1,000 inhabitants.<sup>97</sup></li> </ul>
<p><b>Denmark</b></p>	<ul style="list-style-type: none"> <li>• In this county there should be one full service outlet in each town with more than <b>5,000 inhabitants</b>. This should be located in such a way that users do not need to travel more than <b>5km</b> (measured in a straight line). On the other hand post offices in towns</li> </ul>

<sup>97</sup> WIK-Consult, The Evolution of the Regulatory Model for European Postal Services, 84.

	between <b>2-5,000</b> inhabitants should not be closed unless another service outlet is provided. In rural areas postal offices cannot be closed if the increased distance to the nearest post office is more than <b>10km</b> measured in a straight line. <sup>98</sup>
<b>France</b>	<p>The following factors are taken into account when determining access requirements:</p> <ul style="list-style-type: none"> <li>• Distance and access time of local service provided by the network of post office counters;</li> <li>• Social, economic and demographic characteristics of the areas concerned;</li> <li>• Geographical specificities of the area itself and of its surroundings especially where this concerns mountainous areas;</li> <li>• Other than in exceptional circumstances, access requirements do not permit more than 10% of a 'département'<sup>99</sup> population to be further than <b>5km</b>, or more than <b>20 minutes car drive</b> under normal driving conditions for the area concerned, from the closest La Poste counter.</li> </ul>
<b>Hungary</b>	Settlements with more than 600 people must have one permanent Post Office. However, localities between 600 and 1,000 can be served with mobile facilities if approved by the local authority. In every town there must be one permanent Post Office within 3 km [1.9 miles] of residents, plus additional postal offices for every 20,000 people. <sup>100</sup>
<b>Ireland</b>	<ul style="list-style-type: none"> <li>• There should be a posting point as near to the commercial centre of each town as practical from which a collection is made on five days a week (i.e. Monday to Friday, excluding Public Holidays) not earlier than 5.30 p.m. to secure next day delivery nationwide. Notwithstanding this fact, some exceptions do exist.</li> <li>• In addition to the availability of posting points as described above, posting points for single piece mail in standard envelopes shall be provided so that no one has to travel more than <b>1km</b> within the town area to post a letter, subject to the same requirements as regards frequency and timing.</li> <li>• Also additional posting points for single piece mail in standard envelopes are provided so that no one has to travel more than <b>3km</b> to post a letter.<sup>101</sup></li> <li>• There shall be at least one access point in every town or city within the state with a population in excess of 15,000 at which customers, or their agents, are able to deposit <b>Bulk Mail</b> with An Post. Where an administrative county does not have a town with a population in excess of 15,000 there shall be an access point, for Bulk Mail, in the largest town of that county. In the case of Dublin City there shall be at least two access points, for Bulk Mail.</li> </ul>
<b>Latvia</b>	<ul style="list-style-type: none"> <li>• In each municipality where the resident density exceeds 500 residents per square kilometre there should be a minimum of one</li> </ul>

<sup>98</sup> NERA Economic Consulting (2007), *ibid.*, 229.

<sup>99</sup> A département is a subdivision of a French region.

<sup>100</sup> NERO Economic Consultancy (2007), 229.

<sup>101</sup> ComReg (2003), *Postal Services – Universal Service Obligation, Tariff Principles and miscellaneous issues. Directions to An Post under the European Communities (Postal Services) Regulations 2002, S.I. No. 616 of 2002, 55-56.*

	<p><b>post office</b> per 20,000 residents. In all other municipalities there must be least a post office that provides general services.</p> <ul style="list-style-type: none"> <li>As regards <b>post boxes</b>, there should be a minimum of one post box per <b>3,000</b> residents in towns and cities, and a minimum of one post box per <b>2,000</b> residents in rural territories, including one post box at every post office.</li> </ul>
<b>Netherlands</b>	<p>There must be a post office offering the full universal service package within <b>5 km</b> of:</p> <ul style="list-style-type: none"> <li>at least 95% of inhabitants in populated areas;</li> <li>at least 85% of inhabitants in less populated areas</li> </ul> <p>As for letterboxes<sup>102</sup>:</p> <ul style="list-style-type: none"> <li>In populated areas, there must be a letterbox within 500 metres;</li> <li>In less populated areas the distance is increased to 2,500 metres.</li> </ul> <p>A post office can only be closed if there is another post office within <b>5km</b> and if the <b>turnover</b> is less than 11,344 euros per year.</p>
<b>Norway</b>	<p>There should be <b>a minimum of one post office in every municipality</b>. All universal services should be available at all post offices/rural postmen. Exceptions are made in the case of services which are not commonly used and which imply high costs. There is <b>no specific requirement for bulk mail posting</b>.</p> <p>Regarding the procedure for closure/movement of existing access points, the licence for Norway Post requires that planned changes in the postal network are to be <b>notified 2 months in advance</b> to the Norwegian Post and Telecommunications Authority, with documentation to show that the licence requirements and customer needs are met. Users should be notified within the same timeframe.</p>
<b>Poland</b>	<p>On average one point of contact of the operator should cover 7,000 inhabitants in urban areas and 65 km<sup>2</sup> [25.1 miles<sup>2</sup>] in rural areas.<sup>103</sup></p>
<b>Sweden</b>	<p>Posten AB's licence terms and conditions require that services withdrawn from access and distribution points affecting more than one user and for which no acceptable alternative has been suggested, are subject to approval by PTS (The National Post and Telecom Agency). Access points include both postal outlets and business centres.<sup>104</sup></p>
<b>Switzerland</b>	<ul style="list-style-type: none"> <li>All residents must be within 15-minute walk of a postal office.<sup>105</sup></li> </ul>
<b>United Kingdom</b>	<ul style="list-style-type: none"> <li>In each postcode area where the <b>delivery point density</b> is not less than 200 delivery points per square kilometre, not less than <b>99% of users</b> or potential users of postal services are <b>within 500 metres</b> of a post office letterbox, and</li> </ul>

<sup>102</sup> There are 19,000 letterboxes in the Netherlands.

<sup>103</sup> NERA Economic Consulting (2007), *ibid*.

<sup>104</sup> PTS (2006), Presentation of Posten AB's new service network. A Presentation in English of PTS reports on access to the new postal network, 5.

<sup>105</sup> NERA Economic Consulting (2007), *ibid*.

- The distribution of access points capable of receiving the largest relevant postal packets and registered mail is such that:
  - I. in the authorised area as a whole the premises of not less than 95% of users or potential users of postal services are within **5 kilometres** of such an access point;
  - II. In all **postcode areas** the premises of not less than 95% of users or potential users of postal services are within **10 kilometres of such an access point**, and such access points are available to the public in accordance with conveniently published schedules. For the rest of the postcode area who are not within 10 kilometres of an access point, the license holder has to publish a statement of the arrangements it has established or intends to establish to ensure that these users will be provided with reasonable access to such facilities.<sup>106</sup>
- Regarding the procedure for closing existing access points, it is the responsibility of Royal Mail to notify the postal watchdog Postwatch, and then for Postwatch to notify Postcomm if there are any access points being removed from areas which are at risk of failing to comply with the density requirements contained in Condition 3 of the Licence

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<sup>106</sup> A license holder must also publish a statement of the arrangements it has established or intends to publish to ensure that users of postal services who have significant difficulty in reaching the post office letterboxes and access points because they are blind or partially sighted, infirm through age, chronically sick, or disabled, are able to post letters and postal packets regularly and as far as possible without significant cost to those users attributable to their difficulties.