

CERP report on the application of EN 13850 regarding national needs and peculiarities

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1 Introduction

EN 13850 Postal services - Quality of service - Measurement of transit time of end-to-end services for single piece priority mail and first class mail has been developed in order to provide a standardised method that can be used throughout Europe for measuring the transit time of end-to-end mail services and to assist postal service providers in complying with the requirements of the 1997 Postal Directive of the European Commission.

During the CERP Working Group Supervision/Market Data meeting in Stockholm on April 18, 2007 it was decided to form a working group in order to investigate in more detail how EN 13850 is implemented in the different member states. EN 13850 contains a number of requirements which may be agreed with or should be approved by national postal regulators. Currently CEN TC 331 postal service, Working Group 1, is evaluating EN 13850 for the purpose of a possible future revision.

The report from the CERP project team "Implementation of CEN quality of service standards" gives a good overview of the implementation of EN 13850. As stated in this report EN 13850 is implemented in different ways in different member states. This is partly due to the fact that the national regulatory authorities take national needs and peculiarities into consideration when implementing EN 13850, in accordance with the standard¹. The purpose of this report is to investigate to what extent the national regulatory authorities implement EN 13850 differently due to national needs and peculiarities. This may provide information that can be used under the revision of EN 13850, and ensure that the interest of the national regulatory authorities is being considered during the revision. Note that this report is related to domestic mail only.

The working group² has done a survey with 15 questions related to the implementation of EN 13850 in the CERP member states. This report is based on the structure of the questionnaire. First the group has examined the characteristics used for test letters in the different countries in order to clarify whether what kind of characteristics are used in the different member states (see chapter three). Then in chapter four, transit time as quality of service indicator is discussed. This includes the "force majeure" term in the EN 13850, and the calculation method used for calculating transit time. In chapter five the methodology of the measurement is discussed including the frequency set by the national regulatory authority on the real mail study, and the exemptions given by the national regulatory authority concerning geographical stratifications. In chapter six test mail characteristics are discussed, hereunder the revision of the list of all discriminant mail characteristics from one operator and the exclusion of P.O. boxes from the measurement. The final chapter is about quality control and auditing.

The references to articles and annexes in the report are to EN 13850 articles and annexes. The questionnaire that formed the basis of the report was sent to all the CERP member states, 26 of these countries have responded to the survey. The respondents are as follows: Belgium, Czech Republic, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, The Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and United

¹ See the implementation guide of EN 13850, CEN doc N 637 published as: CEN/TR 14709:2006.

² Members of the working group are Even Tukun of the Norwegian Post and Telecommunications Authority (Head of the working group), Joost Callaert of the Belgian Institute for Postal services and Telecommunications and Dr. Frank Raudszus of the Federal Network Agency (Germany).

Kingdom. One respondent has not answered the questionnaire due to the fact that the implementation of the EN 13850 is voluntary in the respondent's country. Another respondent has not answered the questionnaire as the national regulatory authority has not yet agreed on the main principles of the measurement according to EN 13850.

2 Executive summary

The responses to the survey indicate that the national regulatory authorities have used the authority they are given by EN 1350 within proportions. Only 27 % of the respondents have classified any events as "force majeure" in accordance with paragraph 4.2.2 in EN 13850. The respondents that have classified events as "force majeure" the last three years practice the powers given to them in accordance with paragraph 4.2.2, restrictively. There are differences in the calculation of transit time between the countries that have responded to the survey. However 58 % of the respondents use the five day-working calculation rule described in annex B, B1 in EN 13850. The geographical and demographic differences between the states that have responded to the survey are reflected in the implementation of EN 13850. The methodology and test mail characteristics are in particular influenced by these factors. The survey also shows that the respondents, to some degree, measure different categories of domestic mail (single piece priority and first class mail). These differences may cause problems when comparing the results of the measurements done according to EN 13850 from different countries. The results of the survey also show that most national regulatory authorities (87 %) exercise a quality control and auditing of the independent body implementing the audit for the real mail studies and the quality of service measurement system.

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3 The scope of the measurement

Since the national regulatory authorities are not obliged to use the discriminant mail characteristics described in article 6.3 in EN 13850 in the measurement, these statistics may vary from country to country. The effect of this can be that different CERP member states are using different characteristics. The working group therefore posed the following question in order to map out the used measurement characteristics.

Question 1) Please give some information about the categories of domestic mail (only single piece priority mail and first class mail) measured in your country according to EN 13850. Do you measure the following categories?

- Type of induction, for example at mail street boxes, at post offices, collection from senders premises, induction at sorting centres or at franchised service points.
- Formats (size and thickness): C6, C5, C4 or equivalent.

Weight breaks: 0 to 20 g, 21 to 50 g and above 50 g.

The results were as follows:

	Used characteristics	Not used characteristics
Type of induction		
At mail street boxes	100 %	
At post offices	91 %	9 %
Collection from senders premises	52 %	48 %
At franchised service points	52 %	48 %
At sorting centres Formats	41 %	59 %
Size and thickness Weight breaks	95 %	5 %
0 to 20 g	95 %	5 %
21 to 50 g	86%	14 %
above 50 g	68 %	32 %

The survey shows that some countries use format as an estimator for weight. Furthermore the survey indicates that some postal operators use test letters incorporating only weight breaks up to 20 or up to 50 grams, and not test letters weighting more than 50 grams. One respondent pointed out that even though they only used test letters weighting up to 20 grams, these measurements were valid also for the other weightbreaks. The reason for this was that the volumes of the remaining weightbreaks were so low that the NRA did not find it necessary to include them in order to get a representative sample.

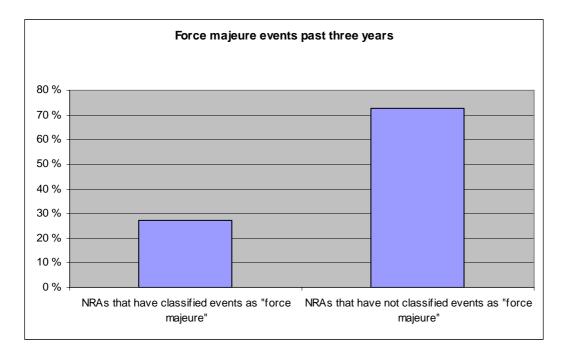
4 Transit time as quality of service indicator

4.1 Continuity of measurement

In article 4.2.2 second paragraph it is stated that in case of "force majeure" events, deduction of corresponding period may be considered in agreement with the national regulatory authority.

Question 2) If your national regulatory authority has classified any events as "force majeure" in accordance with paragraph 4.2.2, please describe these events briefly.

73 % of the respondents have not classified any events as "force majeure" the last three years. However two respondents have not answered whether or not they classify any events as force majeure. A frequent reason for force majeure is bad weather conditions and general strike.



Question 3) If any, how many events have been classified as a "force majeure" by your national regulatory authority in accordance with paragraph 4.2.2 during the last three years?

Almost all of the 27 % of the respondents that have classified any events as "force majeure" practice the authority given to them in paragraph 4.2.2 restrictively.

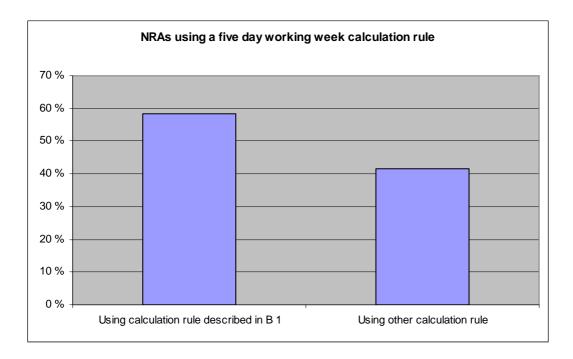
4.2 Calculation of transit time

As a starting point the transit times for domestic (and cross-border) mail shall be calculated according to a five-day working week calculation rule; whereby Saturdays, Sundays, and national holidays in the country of delivery are subtracted (see annex B, B1).

However according to article 4.2.3 second paragraph, for domestic mail, the transit times may, in addition be calculated according to the weekend collection and delivery pattern provided if required by the national regulatory authority (see the calculation rules of annex B, B.2).

Question 4) Does your national regulatory authority use a five-day working week calculation rule, whereby Saturdays, Sundays, and national holidays in the country of delivery are subtracted (see annex B, B1)?

58 % of the respondents are using a five-day working week calculation rule described in B1.



Question 5) If not, which of the calculation rules described under Annex B, B.2 are used in your country?

42 % of the respondents are using a different calculation rule. Most of these respondents use the rule described in B.2.3. One other respondent uses the rule described in B.2.4. There is also one respondent using B.2.2 and one respondent which has developed its own calculation rule based on the conditions in the country. Two respondents using the rule described in B.2.3, have specific adaptations of the rule.

Question 6) Do you have any suggestions on how to compare transit time in countries using different calculation rules?

Some respondents answered as follows:

- Only comparisons between countries with equal service standards and calculation rules are relevant.
- Annex B1 (the official rule) indirectly defines a minimum level of service which can be used for comparison purposes. Any operator exceeding this minimum level of service (for example delivering on Saturdays or collecting on Sundays) has the opportunity to improve his QoS-level. The official rule enables statements of the following kind: "A comparison of all operators offering at least a five day working week service delivers the following ranking..."
- Transit time should not be affected by the different calculation rules. Where the
 operator does not work at weekends it is correct to discount these days. However
 where collections and deliveries are made at weekends it is only correct to reflect
 this in the calculation to give accurate transit time data.
- In all countries there should be a five-day working week calculation rule, since that is also a rule in Directive. But that is probably a problem CEN should deal with.
- The calculation rules of annex B do not have so much impact on the final result as the volumes during the weekend are quite low.

5 Methodology

5.1 Real mail studies

According to article 5.3 paragraph six, the frequency of the real mail studies shall be determined in accordance with the national regulatory authority and shall be performed at a minimum once every third year.

Question 7) What frequency of the real mail studies is set by your national regulatory authority?

All the respondents fulfil their obligations according to EN 13850. 38 % of the respondents revise their mail studies every third year. 29 % of the respondents revise their mail studies annually. 25 % of the respondents have no determined point of revision. One respondent revises the mail studies on a monthly basis, another respondent revises the mail studies every third month.

There is a spread in the revision of the mail studies. The determination of the frequencies of the real mail studies may have a significant influence on the result of the measurement when there is a change in the offer of services.

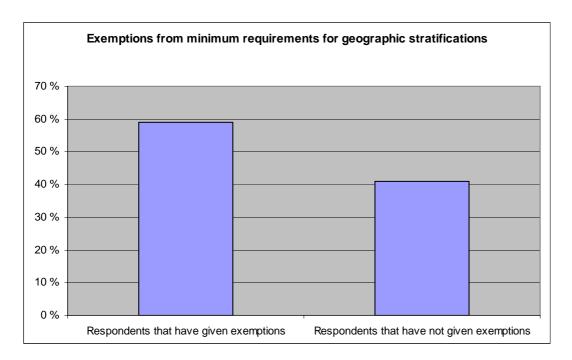
5.2 General

Article 5.4 sets minimum requirements for geographical stratifications.

However, according to the same article (for example 5.4.1 and 5.4.2) the national regulatory authority can, within certain limits, make exemptions from these requirements.

Question 8) Has your national regulatory authority given any exemptions in accordance with article 5.4?

59 % of the respondents have given exemptions in accordance with article 5.4, reflecting the different socio demographic structures in the different countries.



Question 9) If so, which exemptions have been made?

It is particularly the stratas urban and rural that it has been given exemptions from. Some countries use zip-codes based on the postal logistic structure of their countries as an element for geographical stratification.

Question 10) What are the reasons for the exemptions?

The exemptions are largely due to the different national regulatory authorities' whish to adapt the measurement to the socio demographic structures of the countries, and by so forth getting a more accurate measurement. In some cases the reason for the exemptions are the location of the sorting centres, e.g. France and Germany.

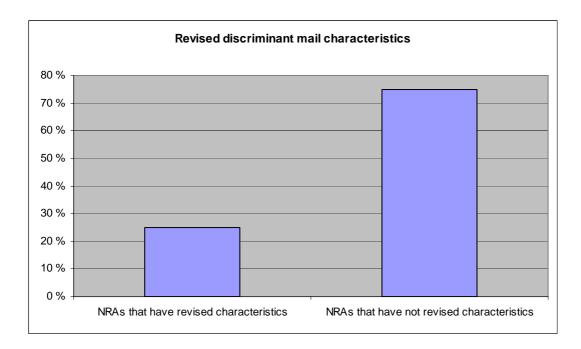
6 Test mail characteristics

6.1. General

According to article 6.1 third paragraph, concerning domestic measurement systems, the list of all discriminant mail characteristics from one operator may be revised based on the results of empirical studies on the subject by agreement with the national regulatory authority.

Question 11) Have your national regulatory authority used this option?

Only 25 % of the respondents have revised the list of all discriminant mail characteristics from an operator.



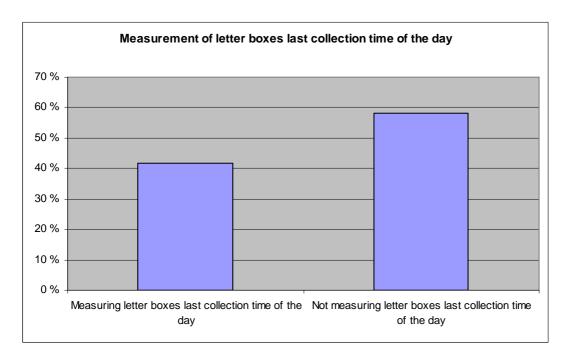
Question 12) If yes, in which way?

The structural parameter "time of posting" is the discriminant mail characteristics that is most frequently revised among the respondents.

Article 6.2 describes the discriminant characteristics that as a minimum shall be measured through real mail studies.

Question 13) Do you measure the branches and letter boxes last collection time of the day?

42 % of the respondents measure the last collection time of the day. 58 % of the respondents replied that they do not measure the last collection time of the day.

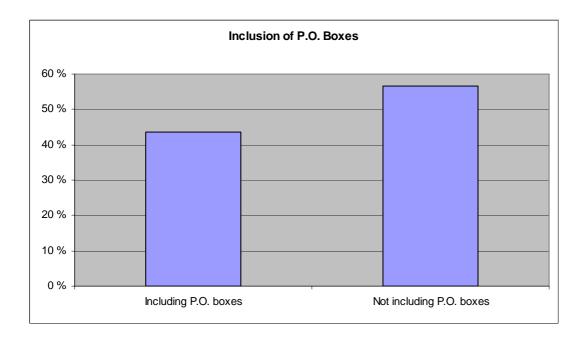


6.2 Highly discriminant mail characteristics

According to article 6.2 second paragraph, P.O. boxes may be excluded from the measurement system by agreement with the national regulatory authority.

Question 14) Are P.O. boxes excluded from the measurement system in your country?

57 % of the respondents do exclude P.O. boxes from the measurement system in their country. 43 % of the respondents did not exclude P.O. boxes from their measurement. There is no evident connexion between the respondents using a use a five-day working week calculation rule and the respondents that have excluded P.O. boxes from their measurement.



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7 Quality control and auditing

According to annex C, C10, audit shall be implemented by an independent body approved by the national regulatory authority for the real mail studies and for the quality of service measurement system.

Question 15) Have your national regulatory authority approved the independent body?

87 % of the national regulatory authorities have responded that they do approve the independent body. 13 % of the respondents have answered that they do not control the independent body.

