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Director, Postal Policy

Post, International Telecommunications and ACMA Branch
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Postal Industry Ombudsman Submission regarding the proposed amendments to the *Australian Postal Corporation (Performance Standards) Regulations 2019*

As the Postal Industry Ombudsman (PIO), we welcome the opportunity to provide further comment regarding the proposed amendments to the *Australian Postal Corporation (Performance Standards) 2019*.

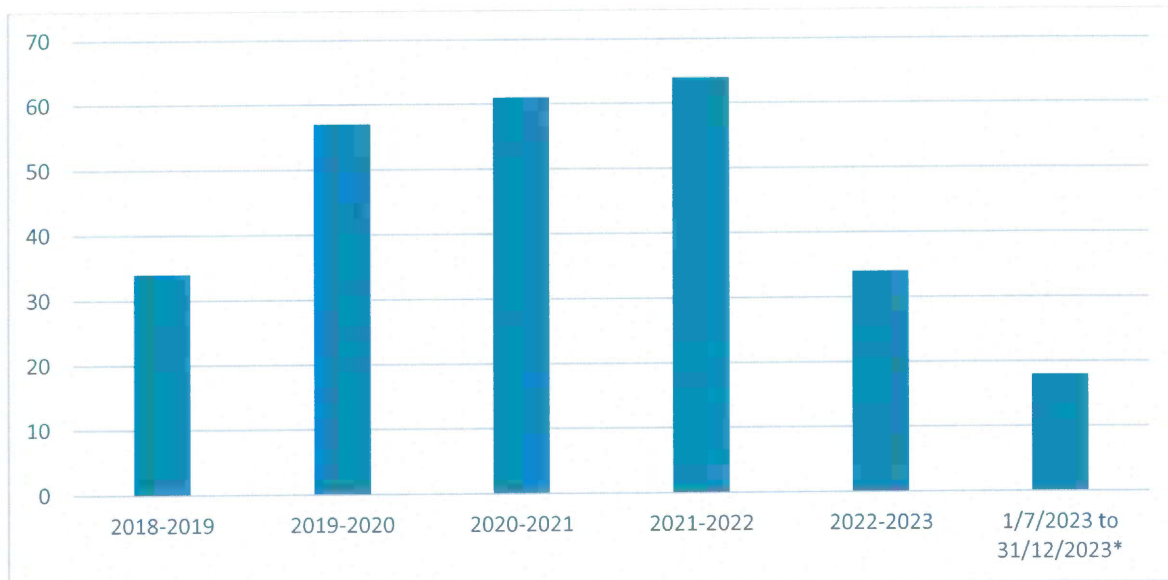
The PIO's views about changing the frequency of letter delivery and service speeds remain as stated in response to the previous consultation regarding the *Postal Services Modernisation Discussion Paper* dated April 2023.¹

In our previous submission, we noted that it was reasonable to conclude some people were adversely affected as a result of the increased delivery time and reduced frequency of letter delivery, particularly relating to time-sensitive matters such as letters regarding doctor's appointments, payments or invoices arriving after their due date. This was reflected in a small increase in complaints related to delays in letter delivery when letter frequency was reduced during the COVID pandemic.

Figure 1 shows complaints about delays in letter delivery increased during the pandemic from 2020 to 2022 but returned to pre-pandemic levels during 2022-23. The half-yearly data for 2023-2024 is currently on track for similar pre-pandemic numbers of complaints regarding letter delivery delays.

¹ See: <https://www.infrastructure.gov.au/sites/default/files/documents/post2023-submission-no-33-commonwealth-ombudsman.pdf>

Figure 1: Number of complaints received about delays in letter delivery



**Interim data to 31 December 2023*

We note the proposed amendments to the frequency and timeframe of letter delivery closely mirror the arrangements during regulatory relief which saw an increase in complaints relating to these types of delays.

With this in mind, we reiterate that it will be important for Australia Post to clearly communicate about the changes to letter delivery frequency and to commence doing so well ahead of time, particularly to businesses communicating with customers by letter. Both consumers and businesses will need to adapt to these changes and take the longer delivery times into account, particularly when sending time-sensitive mail.

Our views relating to a potentially disproportionate impact on rural, regional and remote Australians remain. These Australians already find it harder to access essential services and may not have access to alternatives. Lower frequency in letter services could impact on their access to utilities, health services, financial institutions and government services. We will continue to support any further consultation processes to obtain feedback on how this may affect stakeholders, particularly in these areas without access to alternatives to the postal service.

Yours faithfully,

Iain Anderson
Postal Industry Ombudsman