



Sophie Colman  
Principal, Economic Policy  
Postcomm  
Hercules House  
Hercules Road  
London  
SE1 7DB

29<sup>th</sup> January 2010

Dear Sophie,

### POSTCOMM'S CONSULTATION PROCEDURES

The Postal Trade Association Forum is pleased to be able to *briefly* respond to Postcomm's consultation paper on their Consultation Procedures.

Having discussed your consultation with Postaf members their general conclusions were much the same as the paper I have submitted on behalf of the Mail Users' Association. The following supports and extends the views expressed by the MUA.

### **Early Engagement**

At the meeting between Postcomm and Postaf, on 14<sup>th</sup> December last, to discuss the Forward Work Program it was emphasized by Postaf members that early engagement by Postcomm with stakeholders on consultations was essential, specifically, *before* the completion and publication of the consultation document.

Postaf and Postcomm accepted that this should become part of the consultation process and as a minimum Postcomm would ensure that they would provide a briefing at the regular Postaf meetings. (See item 2 of the minutes of that meeting)

### **Consultation Timeframe**

During the pre-consultation discussions Postaf recommends that there should be a clear proposal for the actual process and timings of that consultation. The result should be clearly set out in the *initial* consultation document.

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The concern is that without a clear, upfront, statement regarding the specific consultation process, including the time available for each phase, stakeholders cannot adequately plan their own activities in evaluating and responding to the Regulator.

## Consultation Types

Postaf members were concerned that the types of consultation being proposed were being defined by measures that are at the very least ill-defined and potentially contentious. (pp 2.16 & 2.17)

As an example - Because a matter may only be of interest to a small number of parties is no reason to penalise stakeholders by restricting the available consultation period. A clearer definition of how the alternative types of consultations would be used should be considered.

If I can add any further information to our submission please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alan MJ Halfacre". The signature is fluid and cursive, with a large loop at the end.

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## Background to Postaf

### Working for an effective Postal Service in the 21st Century

The Postal Trade Association Forum Limited was established in October 2008 to promote, for the benefit of Members, a strong, competitive and sustainable postal service within the United Kingdom.

The key objective of Postaf is to provide a forum for Members to inform, discuss, consult and negotiate on postal matters with all postal stakeholders.

These stakeholders include but are not limited to:

- The Postal Regulator
- UK Government and European Union
- Consumer and Employee Representatives
- Postal Carriers including Royal Mail

The Membership is formed of Trade Associations whose organisations, directly or indirectly, have an interest in the key objective of Postaf. Postaf has the support of the Royal Mail Group.

See [www.postaf.org.uk](http://www.postaf.org.uk) for more detail