PD CEN/TR 16706:2014

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Postal Services — Quality of Service — Measurement of incorrect delivery — Feasibility Report

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National foreword

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The UK participation in its preparation was entrusted to Technical Committee SVS/4, Postal services.

A list of organizations represented on this committee can be obtained on request to its secretary.

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ISBN 978 0 580 85163 6

ICS 03.240

Compliance with a British Standard cannot confer immunity from legal obligations.

This Published Document was published under the authority of the Standards Policy and Strategy Committee on 31 July 2014.

Amendments issued since publication

Date	Text affected

TECHNICAL REPORT

RAPPORT TECHNIQUE

TECHNISCHER BERICHT

CEN/TR 16706

July 2014

ICS 03.240

English Version

Postal Services - Quality of Service - Measurement of incorrect delivery - Feasibility Report

Services postaux - Qualité de service - Mesure de la livraison erronée - Rapport de faisabilité

Messung fehlerhafter Zustellung - Machbarkeitsstudie

This Technical Report was approved by CEN on 7 June 2014. It has been drawn up by the Technical Committee CEN/TC 331.

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Foreword

This document (CEN/TR 16706:2014) has been prepared by Technical Committee CEN/TC 331 “Postal services”, the secretariat of which is held by NEN.

Attention is drawn to the possibility that some of the elements of this document may be the subject of patent rights. CEN [and/or CENELEC] shall not be held responsible for identifying any or all such patent rights.

1 Scope

This Technical Report provides the results of a feasibility study to determine whether a European Standard for the measurement of incorrect delivery could be developed. CEN/TC331 decided a European Standard was not feasible but that the results should be kept and the report transferred into this Technical Report.

NOTE 1 At the end of 2011, TC/331/WG1 established Project Team F to research the measurement of incorrect delivery in accordance with the tender "RENEWED open call for project team experts for the execution of the work called for in the grant agreement SA/CEN/ENTR/EFTA/428/2009-06 Postal Services - Elaboration and adoption of standards documents in the EU and EFTA". The Working Plan of PT F was approved at the plenary meeting of CEN/TC 331 in December 2011.

NOTE 2 According to the Working plan, PT-F presented to the TC/331/WG1 a first report at the meeting in Belgrade in March 2012. PT-F expressed the opinion that the development of a standard was not feasible and that they suspected that a standardization document would not produce the expected results, that is a reduction in the number of incorrectly delivered postal items. PT-F highlighted that such a measurement system had no capability to recognize and record when a real event occurred (only when the sender and/or the receiver submitted a complaint), and therefore it will be unreliable. PT-F also mentioned the difficulty in finding existing and feasible measurement methods which would reliably measure such rare events.

NOTE 3 In an open discussion with WG1 members at the March 2012 meeting, PT-F also mentioned a previous Feasibility Study and other research which came to the same conclusion that such a measurement is not feasible. PT-F and WG1 proposed to TC331 to adopt the feasibility study on "Measurement of incorrect delivery" at the Plenary Meeting in Ljubljana in May 2012.

2 Normative References

None.

3 Summary of Feasibility Study

The task has been to produce a feasibility study for measurement of incorrect delivery. PT-F focused on the following two issues:

— how to find an appropriate measurement system and a measurement method; and

— how to find a unambiguous and clear definition for incorrect delivery which will be unanimously accepted.

An appropriate measurement system is very difficult to establish as it shall be able to recognize incorrect deliveries in amongst mail that has been correctly delivered. Use of customer complaint data would not provide a reliable estimate as the intended recipient may not be aware an item has been incorrectly delivered.

A method by which it would be feasible to measure the number of incorrect deliveries is almost impossible to define, because these are rare events. Some indicators suggest that incorrect delivery occurs once in 100000, or more, correct deliveries (according to available data from EN 14012). Although a number of approaches were discussed, with those which are currently used in the postal measurements (test mail and real mail); telephone studies, field studies and others in social research, PT-F concluded that there is no one feasible method to measure such rare events.

The definition of incorrect delivery is directly related to any deviation from the correct delivery. Because the definitions and procedures for correct delivery vary by country PT-F was faced with many differences when they tried to propose a common definition for the term "incorrect delivery".

Incorrect delivery may have two aspects: delivery to an unauthorized person, which is usually regulated by national postal legislation, and the improper procedure of confirmation, which postal operators usually define with product and service manuals. Who can be the authorized person is difficult to define and may differ for every country due to different legal systems and numerous national legislations. A further complication is that

it is often difficult to determine who has been responsible for an incorrectly delivery. For example, if the sender wrongly addressed the postal item, and the postman delivers that item as addressed, is it a correct or an incorrect delivery? When an unwanted event happens there is an obligation to determine who was responsible for the incorrect delivery; the sender or the postman or even an objective circumstance. However, this means that it is necessary to separately assess each event before it can be determined that it is an incorrect delivery.

To conclude, if it is impossible to build a measurement system that will identify each unwanted event when it happens, if it is impossible to find an acceptable method by which such rare event can be measured, if it is impossible to determine at the time of the event who is responsible for the incorrect delivery, if it is impossible to find a common definition of who can be authorized person in numerous postal legislative acts,..., then this is why it was concluded that the measurement of incorrect delivery was not an appropriate topic for a standard.

In accordance with the conclusion, it should be noted that the previous feasibility studies all rejected the possibility of developing a standards for the measurement of incorrect delivery. In this sense, we wish to note that we reviewed a lot of postal studies, legal acts and standards where we found direct and indirect support for that conclusion. Finally, let's look at the reasons why it’s impossible to continue this project from technical, legislative and economic points of view.

From a technical point of view, it is difficult to find an adequate method for measuring the number of incorrect deliveries because it is a very rare event. Also, it is very hard to set up a recognizing system which would be responsible for detection of all unwanted events. Now, systems count only events when the sender or the addressee complain about incorrect delivery, which NPO collects using EN 14012, and where he determinates the responsibility and yearly publishes the cumulative results.

From a legal point of view, it is not possible to provide a common definition for the event of incorrect delivery due to different legislative systems and the large number of different postal legislative solutions. Neither is it possible to standardize who could be the authorized persons for all countries or how the procedure of notification for all postal operators be consistently performed? Therefore, how can we measure events that we do not know for sure have occurred?

From an economic point of view any solution, which includes standardization documents, would be very expensive without clear benefits for customers, regulators or operators. Also, our consideration suggests that quality postal inspection or supervision could be a better solution for resolving rare cases of incorrect delivery than measurement.

Therefore, our final conclusion based on technical, legal, economic and other aspects is that a continuation of the project “measurement of incorrect delivery” is not feasible.

4 Feasibility Study

4.1 Introduction

The main task of when preparing a feasibility study (FS) is to investigate the positive and negative results of a planned project before it starts. In other words, for developing the FS it is necessary to review legal, economic, technical and other factors, according to a project’s Terms of Reference (ToR), in order to objectively identify the strengths and weaknesses of the proposed investment and the prospects for success.

Therefore in the FS we first tried to explain most important parts of project “ToR and Rationale” which we received with the Agreement and basic concept of our Work Plans, which are adopted in official meetings. Then we will present postal literature, standardization documents and other documents about this subject and what we found during research as well as provide some definitions and explanations of basic issues, which are necessary for understanding this subject. At the end we will analyse the prescribed project task from a technical, economic and legal view and give conclusions and recommendations.

Figure 1 shows the concept of the FS.

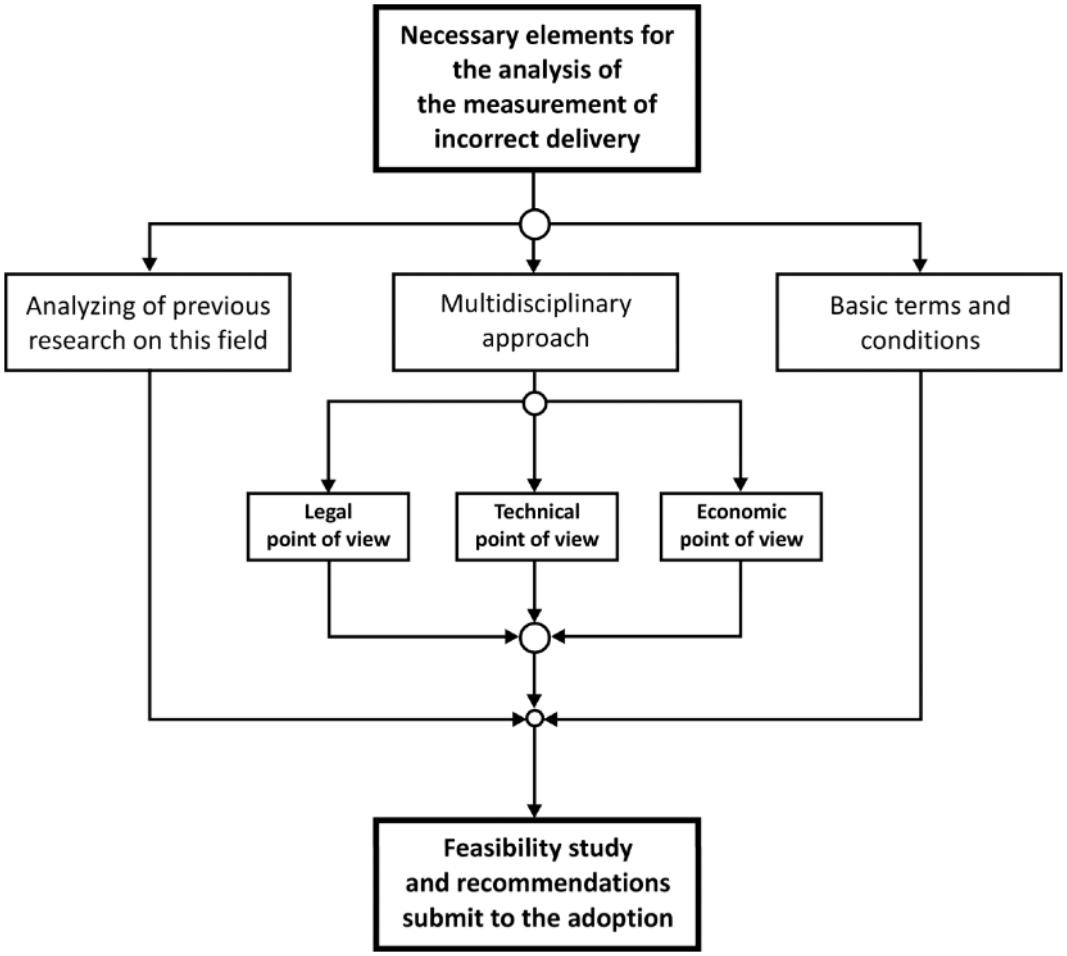

Figure 1 — Concept of the feasibility study

4.2 Clarification of ToR and Rationale from the Project

According to the Terms of Reference (ToR) of the Project, the objective of Project Team F (PT-F) is to study the feasibility of a standard in its 1st phase and, if appropriate, to provide a draft standard for the Measurement of incorrect delivery in its 2nd phase. The deadline for the 1st phase was set at 14 months (2 months for Working Plan and 12 months for the Feasibility Study) and, if TC/331 agreed to start the 2nd phase, a further 18 months. However, in collaboration with WG1, members of PT-F propose that TC/331 should accept the recommendation that it is not feasible to develop a standard for the “measurement of incorrect delivery” and therefore to end the project after the first phase. Here are some explanations for such a decision.

The rationale of the ToR states that: “Registered postal items contain – by nature – important messages or goods. Any of such items, which may be delivered to a person not being authorized to receive them may cause substantial problems, even if the correct addressee receives it afterwards. The knowledge of the quality performed by the operator would therefore give the customer an indication, to which extent registered postal items are delivered.”

A registered postal item according to the Postal Directive, is a postal service of “providing a flat-rate guarantee against risks of loss, theft or damage and supplying the sender, where appropriate upon request, with proof of the handing in of the postal item and/or of its delivery to the addressee“. Also, it is similarly described in the Universal Postal Convention. So, based on above it is one of the key tasks to give a clear answer on who is authorized to receive a postal item because this event “may cause substantial problems, even if the correct addressee receives it afterwards”. Therefore, special attention was paid to this issue, which we will explain later.

The part of the ToR that states: “The knowledge of the quality performed by the operator would therefore give the customer an indication, to which extend registered postal items are delivered” we find to be redundant because, according the standard EN 14012:2008, postal operators already have an obligation to collect the number of complaints about domestic and cross-border mail (see EN 14012:2008, Tables I.3.2 and I.3.4) in three separate columns: the total number of complaints for all postal items, of which are “justified complaints” (differentiation from non-justified complaints) and of which are complaints with compensation (what basically means how many complaints have for registered items) as well as according 12 different rows (criteria), including “misdelivery” (definition in EN 14012 is: 3.20 misdelivery - complaint about postal item delivered to the wrong address or the wrong addressee), what basically could be “an indication, to which extent registered postal items are delivered” for customers. Also, postal operators have an obligation to publish this “Report of complaints handling” where users could find out the exact number of incorrect deliveries during the last year and therefore we see no need for an additional explanation of this issue.

The last part of the rationale states: “This work will specify requirements for a method and its implementation aiming at measuring another aspect of the quality of delivery. It deals specifically with registered postal items delivered to someone not authorized to receive them.” Unfortunately, methods for measurement of very rare events (in our case more than 0,000000X of all postal items in traffic) are limited and mostly unreliable. A measurement system, which will be able to recognize every event when a registered postal items was delivered to someone who was not authorized to receive it, besides when addressee or sender submits complaints (which is the only source of information about this unwanted event by now), could be very hard to build up or even impossible. We will also explain these issues in further clauses.

4.3 Set up our Working Plan according the ToR and Rationale

A Working Plan was established with four steps; the first step was to exchange ideas about the scope and rationale from the ToR and to discuss the vision in accordance with those objectives and tasks. Two objectives were determined:

— to identify market needs for the measurement of the incorrect delivery of registered items and

— to find an appropriate method with which can be possible to measure incorrect delivery.

Also, in order that to accomplish those objectives, it would be necessary to first identify and define the basic terms of the task, e.g. what is incorrect delivery, who may be an authorized person according to national legislation and how a system could recognize that an unwanted event (incorrect delivery) occurred.

In a second step it was planned to explore available postal literature, standardization documents and good practice. After we finished this step, we could say that we found and reviewed many studies on postal operations, got familiar with different forms of normative documents and sent many e-mails to our professional colleagues in other countries, but we have not found many sources where our subject was widely and competently discussed.

In some studies, where we found some discussions about miss-delivery in general, usually those subjects are described in the manner: yes, this is very important issue in regard of quality service, because users react much worse than when postal operator loses their postal items. Also, when users make ranking of all improper handling with their postal item from bad to worse, miss-delivery is usually in the middle of ranking list. But, when researchers asked a direct question about their experience, mostly all users say that they have no practical knowledge. Also, according to reports of quality service, which we found on Internet, as well as in direct contact with our professional colleagues in other countries, we found that this occasion (incorrect delivery) was the rarest indicator of quality service. Therefore we concluded that incorrect delivery is a very rare event, but once, when it happens, it has much effect on the consumers’ perspective of the quality of the postal service.

During the research of postal legislation and other postal studies, we were faced with a lot of different definitions about who is the authorized person for a correct delivery. Different legal systems, different national laws and different postal laws in different states make it nearly impossible to define this authorized person. Also, when we add different meanings and different ways of writing the address on postal items in different

states, unique differentiation of who is the authorized person becomes more and more unclear. Due to that reason, we decided that we should also include addressing in our project because that issue has a very important impact on delivery.

Next important and major issue of our project was to find a method of measurement. We expected initially that it would be very difficult to find an appropriate answer to this question and for that reason we were very focused on this issue during research. We presumed that an incorrect delivery is a very rare event, but after we consulted literature and our professional colleagues in other countries, we were surprised how rare this event truly is. So, we concluded that a traditional method for measurement with test items cannot be an option, that a direct telephone survey with addressees who reported incorrect delivery is not representative, that field research on a representative geographic area is much too expensive and so on. So, from the start, we predicted that we were facing a questionable mission.

4.4 Results of previous research about measurement incorrect delivery

In this clause we will point out the studies compatible to our task which are leading to the same conclusions. The first study is the feasibility study “Measurement of wrong delivery and correct notification” which was produced from the CEN/TC331/WG1/PT8. WG1 had set up for 4 different projects, where 2 projects ended with Technical Reports (“Quality of access to postal services” and “Information available on postal services”) and 2 projects ended without a standardization document (“Measurement of wrong delivery” and “Measurement of correct notification”). For our project “Measurement of incorrect delivery” both these previous projects may be relevant, because incorrect delivery, according to the explanation of our ToR, can be understood as delivery to the wrong person or as an incorrect notification procedure.

In those projects PT8 defined four possible reasons for wrong delivery and we used these definitions in a similar way, but instead of “wrong delivery” we used “authorized person”. Their first definition “delivery to the wrong address and to the wrong person” could be translated as “delivery to the unauthorized person” which is either the result of an error by the postman or by a mistake made by the sender when he/she is writing the address and therefore, this shall be judged on a case by case basis. Second (theoretically), “delivery to the wrong address, but to the authorized person”, according to our interpretation, is a correct delivery because the sender only indicates the address where an authorized person lives, not as an order to hand over the item exclusively at this address. Third, “delivery to the address indicated on the item, but the recipient not living there”, probably referred only to ordinary mail because, for registered item, the postman needs to ask the receiver for a record of delivery (otherwise it is a postman error which has infringed the correct procedures, but which, statistically speaking, is virtually impossible to measure). Only, delivery to the right address, but to the non-authorized person, is an issue according to our task and we can consider this as an incorrect delivery because the sender, according to national postal laws, usually orders the delivery of his postal item exclusively to the person marked on the envelope.

Also, PT8 investigated three possible reasons in “Measurement of Correct Notification”, which we also analysed, and we came to the same conclusions. They wrote: “On the one hand there are different products where a notification may take place, there is one circumstance (absence of the receiver) when a notification should take place and there are different features a notification should contain rightly”. Also, they mentioned that incorrect notification is a rarer event than a wrong delivery and that statistical requirements as well as costs of measurement would be higher than for a wrong delivery. Therefore, they came to the same conclusions as we do: “PT8 felt unable to draft a standard according multiple features and requests, especially in the light of the different approaches and regulations on these topics in the European countries.”

In “Report on the Quality of Service and the End-user Satisfaction”, which was produced by ERGP in November 2011, our NRA colleagues investigated via a questionnaire different issues about procedure of delivery. Less than 1/3 of all NRAs indicate that they have some kind problems with registered services in the delivery phase and specified: “many variations of registered items with specific delivery conditions, leaving notification without any attempt of delivery, incorrect disposals, in domestic traffic return to sender within 3 days, lack of possibility to fully trace registered items and other failures in delivery”. After we carefully read the whole report and discussed it together, we concluded that 67 % of all NRA’s have no specific problems regarding their registered service as well as the above mentioned reasons could be in relation with the term “incorrect delivery as whole” but those cannot be measured in the same way.

On the other hand, we read in one old WIK study, which was mandated by the EC on “Quality of Service Objectives, Performance and Measurement in relation to Community Universal Postal Service”, where the difficulty of establishing a representative measurement system in the delivery phase was discussed. They concluded:

"Instead of a representative measurement system, results of the measurement of complaints could be used to get an overview over the loss of postal items. However, complaints could only give hints about the extent of lost and damaged mail. It is possible that the sender will never become aware of non-delivery, thus will never complain about the lost item. The same is true for the addressee who often does not expect a mail item and is therefore not aware of its loss.” We came to the same conclusion when we were thinking about our task measurement of incorrect delivery, because sender and/or receiver are usually not aware that their postal item was delivered to a non-authorized person and therefore this measurement system couldn’t be representative and reliable.

At the end of this clause, we wish to point out one important fact which can be a possible reason why it is very hard to standardize any kind of process in delivery phase. Traditionally, Universal Postal Convention prescribes technological unity in the international postal traffic and therefore almost all countries have same technical requirements and technological process in accepting, sorting and the transporting phase. But, Universal Postal Convention doesn’t regulate the delivery phase and, for that purpose, UPU rely on national legislations. In other words, each UPU member state delivers cross border postal items in the same way that it delivers domestic traffic. So, that fact is very important when anybody considers developing any kind of standardization's document for the delivery phase, because many different ways of delivery exist and therefore it is very difficult to produce a common standard that will apply to all different states.

4.5 Some initial definitions about basic terms and process

4.5.1 Introduction

In this section we will try to define some basic terms that would help us in mutual understanding the basic content of the project.

4.5.2 What is incorrect delivery?

The answer is very simple: incorrect delivery is the contrary of correct delivery. So, we should first try to answer what is correct delivery of registered items, and after we found that definition, we can say that any deviation from this process means incorrect delivery. Also, we concluded that there are two basic components for correct delivery of registered postal items, first, the delivery of the postal item to an authorized person (as a rule, from hand to hand) and second, the correctly conducted procedure of notification (both, if postman finds an authorized person or doesn’t find) as well as the procedure of leaving advice of delivery and/or return to the sender.

Incorrect delivery is any kind of deviation from the prescribed way of delivery of a registered postal item by the terms and conditions on offer by the postal operator.

4.5.3 What is delivery of registered postal item?

The general definition of the word delivery is not useful because it is defines through itself (closed loop). We found definitions like: “The act of conveying or delivering” or “something that is delivered” or “the act of delivering or distributing goods, mail, etc.” but those definitions were not appropriate for our specific requirements, especially for delivery of registered postal items. Therefore we proposed the following definition:

Delivery of registered postal items is the act where a postman hands over a registered postal item to the recipient (addressee) or an authorized person who should confirm delivery (usually with signature).

4.5.4 Who is the recipient (addressee)?

The recipient (or addressee) is a legal or natural person, whom the sender specified in the address of his postal item.

This definition seems very simple, but in practice is often more complex and sometimes very complicated. While correct delivery for the natural person is not challenging, the same cannot be said for legal persons. In fact, postmen in their delivery area may be familiar with all citizens and therefore they may also know the authorized persons to whom registered postal items can be delivered. But how will they deliver registered postal items addressed, for example, to the CEN WG1? To whom will this postal item be given? And how will persons prove that they are authorized to accept this postal item?

4.5.5 Who can be an authorized person?

As we see from the previous example, it is a big challenge to find a common solution to this question. Also, leaving aside the question “who is the recipient for a legal person” (because we'll discuss this in the next definition), and only paying attention to the question “who may be authorized persons”. It is usual that the first authorized person is the recipient. Also, if a recipient is not at home, almost all national legislative prescribe that authorized persons can be persons who have “power of attorney” for the recipient. But, if he/she isn’t home as well, this fact makes our challenge impossible to standardize because almost all national postal legislation prescribe a wide range of alternative persons who can be authorized persons to receive a postal item. So, we don't have an appropriate answer to that crucial question for this project because all across Europe exist minimum three different legal systems and a lot of different national postal laws. This is leading us to too many alternatives when we try to define the term “authorized person”.

Authorized person is a natural person who is determined by recipient or by national postal law and has the right to receive registered postal item in the name of recipient.

NOTE Legally and practically, this delivery is considered completed (meaning, if an authorized person doesn’t forwarded postal item to the addressee, he/she will suffer the consequences, not the postal operator).

4.5.6 What is the role (and influence) of address and addressing on correct delivery?

Address is prescribed groups of data by the postal operator which unambiguously identifies the residence or business premises of the intended recipient of the postal item.

Addressing is the process of creating an address on the postal item as instruction for the postal operator for where and to whom to deliver the postal item.

There are a lot of standards and other postal literature which are dealing with standardization of addressing and address from different angles. But, according to our task, we will focus only on well-known differences which occur when a sender writes an address on the postal item for the postal operator as an instruction to whom to deliver the postal item. As we know, there can be a wide gap between what the sender was thinking before he started writing the address and what the postman concluded from the same information. If the address was written according to postal legislation and guidance of an operator any differences should be small, otherwise, the opportunity for errors can grow. So, it is obvious that the sender and the postal operator share responsibility for the correct addressing of an item and therefore each case shall be investigated for itself in order to decide if the delivery is correct or incorrect.

4.5.7 How should one correct process of delivery look like?

Delivery of registered postal items has quite different technological procedures than delivery of ordinary postal items. While postman may insert ordinary postal items in the house mailbox registered postal items shall be delivered by the postman to the addressee or to a person authorized by the addressee, or other persons prescribed by national legislation that can receive the postal items on behalf of the recipient, of course, with signature and from hand to hand as a rule. Therefore we could say that there are two possible mistakes:

— first, in delivery of postal item to authorized person and

— second, in correctly conducted procedure during delivery of registered item.

We have already defined the term “authorized person” and concluded that almost all countries have different national legislation about who is an authorized person. Therefore we will leave aside that question and consider one imaginary technological process of delivery, step by step, to better understand the above described challenges of our project.

a) The postal operator (meaning, the postman) should first read the address and then decode it in order to conclude who is the addressee.

b) If the recipient is not present, then the postman should determine who the authorized person in accordance with national legislation is.

c) The postman has the duty to identify without suspicion a natural person (with ID or personally known) to which he will hand over the postal item.

d) The postman shall ask this person to sign receipts according to national legislation and to technical instructions of the postal operator.

e) At the end, the postman will hand over the postal item to this person.

From the above described proceeding we find lots of differences which might influence the final conclusion whether a delivery is conducted correctly or incorrectly. For example, in the first case the postman should determine from the address who is the person which the sender noted on the postal item. It can be possible that “Michel FamilyName” denotes sometimes husband and sometimes wife or even sometimes persons on the first or the third floor of a building where two persons with same name and family name are living. Or for legal persons, whether it is essential which the person put the sender in the first or second place in the address, because there are different ways of delivery if in address the natural person is placed before the legal person or vice versa. Many national postal laws pay regard to the sequence of data in the address and usually the postman should deliver the postal item to the person who was indicated on the first place in the address.

The next difference comes when the postman does not find the recipient at home and has to decide who the authorized person is. Lots of national postal laws provide that registered postal items can be handed over to family members instead of the addressee. But, is an authorized person every person who opened the door? And is it correct delivery if the postman identifies a person who said that he/she is the recipient's housekeeper but he/she isn’t. Or, how will a postman identify an underage household person who opened the door and he/she has the right to accept postal item according national legislation? Or how can it be verified that a postman acted or didn’t act according to the technical instructions of the postal operator because every NPO has the right to set up its technological process. At the end, how will the case be solved when an authorized person doesn’t hand over the postal item to the recipient for any reason? So, incorrect delivery is a very rare event and questions like these could become very important when discussing responsibilities for incorrect delivery.

There are two additional processes which follow when a postman does not have the opportunity to hand over a postal item to the authorized person. Usually, the first step is for the postman to inserts in the home mailbox (or hands over to the non-authorized person in hand) the postal advice of delivery with the information when and where the addressee could collect the non-delivered postal item. The procedure to collect those postal items is similar as described for correct delivery. Another procedure is followed if the addressee doesn’t collect his postal item for several days (as noted in the advice of delivery according to national postal law). In that case the postal operator has the obligation to return the postal item to the sender. In both cases it is considered that the postal operator completely conducted its obligation in respect to the required postal services, i.e. that the delivery was correctly performed.

4.6 Main issues which arise from our research

4.6.1 Introduction

After the presentation of our research, in this clause we will point out the three main issues why we concluded that a standardization document for measuring the number of incorrect delivery is not feasible and then, explain it from a technical, legal and economic point of view.

— The first issue relates to a reliable way of determination when incorrect delivery happened (from which arise two sub-questions: who decides when correct or incorrect delivery occurred and how the system will for itself recognize that the incorrect delivery occurred).

— The second issue relates to finding the adequate method for measuring of incorrect delivery.

— And the third issue relates to final conclusion, why it is impossible to create a standard for measurement of incorrect delivery (that consumers have another “quality indicator”, beside “quantity indicator” according EN 14012 about total number of incorrectly delivered registered postal items during the year).

4.6.2 Technical view

From a technical point of view it is difficult to find an adequate method for measuring the number of incorrect deliveries, because this is a very rare stochastic event. According to some “ad hoc” collected data from several NPO reports (according EN 14012) it is obvious that incorrect delivery of registered postal items happens less than 1 in 1 million correctly delivered postal items. In the end we concluded that it would probably be more beneficial for customers, as well as for the whole system, to engage postal inspection or supervision to solving those disputes than finding an appropriate method for measuring an incorrect delivery.

Also, from a technical point of view, it is very hard to establish a system which will recognize when an unwanted event happened. Now, systems are counting only the events when sender or addressee submit a complaint of incorrect delivery, which postal operator processes to find out if it is justified, and who is responsible. According to our mission, we tried to research wider possibilities for successful accomplishment of our task and in that sense we were thinking about a new measurement system for incorrect/wrong delivery, which should be based on questionnaires which operators send to the senders who received returned postal items. But we dropped this idea, because that system could probably include more possible unwanted events, from one side, but it would be very expensive and nor effective and nor independent, from other side. Therefore, we concluded that from a technical point of view the measurement is not feasible.

4.6.3 Legal view

From a legal point of view, the most important aspect is to determine who is responsible for an incorrect delivery, if it really happened, the postal operator or the sender (or some other circumstance); because how could we measure some events if we don’t know for sure that those events really happened. From that fact arise two questions, which are crucial for this project. How will we know for sure who is responsible in different countries with different legal systems for an unwanted event; senders (who could make mistake in address) or postal operator (with authorized person and/or procedure of notification)? And the crucial question for us, whether the legal systems in all countries today provide same result in same disputes about incorrect delivery and whether these differences, when we put them together in some standardization form, will be good enough to provide acceptable results in all countries. We think it is not possible and therefore we concluded, not feasible.

So, different legal systems, different national legislation and different postal laws, as well as articles from the UPU Convention and Postal Directive (in both acts there are no regulation about delivery process), makes our task for developing standard of measurement incorrect delivery, and which should be acceptable to all countries, as well as costumers “indicator about quality of service”, unreal. Moreover, when we add the fact that legislators don’t have rights to prescribe any part of operator’s technological process, we think, that from a legal point of view, our conclusion is quite clear. Also, we wish to point out that costumers already have

quantitative indicator about number of incorrect delivery during the year and that they could conclude something about the reliability of correct delivery.

4.6.4 Economic view

From an economic point of view, we will try to explain our viewpoint through a cost/benefit analysis. Any research, such as that mentioned above (field or telephone survey of users, test or real mail method, questionnaire for returned mail,…), as well as other resources that postal operators should be engaged in cause significant costs, especially when we calculate the cost per incorrectly delivered item. The benefits for users and postal operators are questionable, because both already have quantitative indicators about numbers of incorrect delivery. For that reason, the introduction of dynamic indicators for occasions, which are very rare, will not improve the quality of service.

So, it is quite obvious that solutions will be very costly without significant benefits for both sides (users and postal operators). Also, we think that qualitative postal inspection or supervision can be a better solution for resolving incorrect delivery in general, because it is cheaper, more effective and efficient. And what is more important, they are resolving concrete cases when they occur, and that way it is possible to reduce the number of incorrect deliveries or at least keep the number of such events at the lowest possible limit.

We therefore conclude that any kind of standardization document from an economic point of view wouldn't be feasible.

4.7 Conclusion

4.7.1 General

From the previous text, we think there are quite obvious reasons why we came to the conclusion that it is not feasible to continue the project "measurement of incorrect delivery". Therefore we will concentrate in this clause on two issues, giving our recommendations for future work and why we think that it is not opportune to merge PT-F and PT-E in one project team as WG1 suggested in the meeting of 5/6 March 2012.

4.7.2 Merging PT-E and PT-F

Merging projects "measurement of wrong delivery (ordinary mail)" and "measurement of incorrect delivery (registered mail)" would be the wrong thing to do as they are two completely different models of delivery. While the incorrect delivery deals with wrong hand over of registered postal item from hand to hand to the authorized person (and additionally, correctly conducted procedure of notification), wrong delivery deals with incorrect inserting of ordinary mail in the addressee's mailbox according address on envelop.

So, it is obvious that those are quite different events, quite different procedures and quite different mistakes; even if in both cases someone judged that a postal operator or postman make the mistake, these are different categories of mistakes. For example, is it the same category of mistake if the postman hands over a registered mail to the neighbour without asking for his/her ID or for a signature, or if the postman inserts a postcard in the mailbox of neighbours? Well, both events are incorrect and wrong delivery for sure, but we couldn't say that it is the same level of postman's mistake or same damage for users, or what is more significant for us, the same number of events.

The only similarity in both projects is related to the finding methods of measuring and development of a measurement system, which will automatically detect when an unwanted event occurred. However, we think that an appropriate method for measuring the number of wrong delivered ordinary mails is even more demanding than measuring the incorrect delivery of registered items, because for the ordinary items, postal operators don't keep any kind of records from sender to addressee, and there is no possibility for using information systems for that purpose. Actually, it seems impossible to establish a measurement system, which will be able to automatically identify wrong delivery of regular postal items, so regardless of the decision on merging these two projects, it will remain impossible to answer this issue in the near future.

We could continue listing technological and legal reasons or even formal facts against merging those two projects, but we think it is quite obvious that PT-E and PT-F have a significantly different approach and therefore it is inappropriate to merge them into same project. Also, from an economic point of view both projects search for the solutions for establishing measurement systems, which are not feasible yet, because their costs are so high and benefits for users and operators are so low, so these facts cannot be neglected when taking the decision.

4.7.3 Recommendations for future research

From the beginning of the research we were aware of one fact which will have a crucial impact on results of any kind of standardization project in the delivery phase. UPU Convection, among others, has the intention to regulate the unique postal technology processes all around the world. Therefore, all procedures in accepting (collection), sorting and transport are the same in all member countries. But unfortunately for the delivery phase, UPU Convention relies on national postal regulation. Without questioning the reasons why that happened, the fact is that each member state prescribes delivery process according to their national legislations.

The necessary functionality for the whole technological process of basic postal service was guaranteed in international postal traffic, but a wide diversity in the regulation of the delivery process in all countries was produced. As we said, that fact is very important when discussing standardization in the delivery process. Therefore we propose to TC/331 and/or EC that it will be opportune to reconsider any further individually projects about standardization of delivery process, especially for measurement of anything in the delivery phase, and first to try to establish a project, as example, for technical harmonization (or recommendations) of basic delivery procedures (on the single European postal market). Maybe this project would give better answer about possibilities for standardization of delivery processes as a whole, and provide costumers, users and postal operators with general guidelines on safety and security as well as efficiency and effectiveness of the delivery process. We think that this proposed holistic project will ensure a unique platform for other projects in the delivery phase, like the projects on wrong and incorrect delivery.

4.8 Literature

Legislation

— Postal directive, Universal Postal Convention and many national postal laws

Previous Feasibility Studies and documents

— Report of PT8 19th December, 2003: Measurement of access to postal services and quality of delivery;

— WG1-N004 Measurement of wrong delivery – Feasibility Study (Draft);

— Royal Mail Presentation on Correctly Delivered Mail (CDM) test

ISO standards

— Quality management — Customer satisfaction — Guidelines for complaints handling in organizations, 2004;

— Postal Addressing Systems, UPU, 2010;

— UPU standards glossary, 2007

CEN standards

— ENV 13712:2000, *Postal Services - Forms - Harmonized Vocabulary*;

— EN 14012:2008, *Postal services - Quality of service - Complaints handling principles*;

— CEN/TR 15735, *Postal services - Quality of service - Distance to access points*;

— CEN/TS 15511, *Postal services - Quality of service - Information available on postal services*;

— CEN/TS 14773, *Postal services - Quality of service - Measurement of loss and substantial delay in priority and first class single piece mail using a survey of test letters*;

— EN 14142-1:2011, *Postal services - Address databases - Part 1: Components of postal addresses*

CERP and ERGP documents

— Report on the Quality of Service and the End-user Satisfaction which produced, ERGP, November 2011;

— CERP Relations with Consumers Report, 2007; CERP Quality of Service Report 2008;

— CERP PT Consumer issues: Report on regulatory approaches on Consumer Relations, 2009;

— CERP Report Implementation of CEN standards, 2008

EC studies

— WIK: Quality of Service Objectives, Performance and Measurement in relation to Community Universal Postal Service, EC, August 2003;

— Rand EUROPE: Study on Appropriate Methodologies to Better Measure Consumer Preferences for Postal Services, EC, 2011;

— Copenhagen Economics: Main developments in the postal sector (2008–2010), EC, 2010

Other studies (mostly from a consumers point of view):

— Achieving High Performance in the Postal Industry, Research and Insights, Accenture, 2011;

— Alastair Tempest: Change of Address: What are the issues?, FEDMA, 2008;

— John Horn: Meeting customer expectations in a liberalised postal market, CommReg, 2008;

— Lecg: Ensuring that consumers benefit from the opening of postal markets to competition, CommReg, 2007;

— Cem Suleyman: Competition in postal markets – a small consumer perspective, Consumer Fokus, 2011;

— Letter Lockout - Mail delivery problems of consumers in flats, Consumer Fokus, 2011;

— Balogh T., R. Moriarty, P. Smith, R. Doherty and I. Leigh (2006), “The economic implications of quality of service regulation in a liberalized postal market” and

— Leeni Kiikkilä: Customer satisfaction models for Itellia’s business customers in M.A. Crew and P.R. Kleindorfer (eds), Progress Toward Liberalization of the Postal and Delivery Sector, Springer 2011.

Annex A
(informative)

Measurement of wrong delivery and correct notification

A.1 Background

In May 2001 CEN/TC 331 received its second mandate M/312 by the European Commission. Annex A described the details of the mandate, where No 1 indicated the “Measurement of the Quality of access to postal services and the quality of postal delivery.

A project team (PT8) had been established in Working Group 1 which identified four areas within this point of the mandate:

— “Quality of access to postal services”;

— “Information available on postal services”;

— “Measurement of wrong delivery”; and

— “Measurement of correct notification”.

On “Quality of access to postal services” a technical report has been produced and “Information available on postal services” resulted in a technical specification.

For the two remaining work items “Measurement of wrong delivery” and “measurement of correct notification” the working group felt not able to produce a document without having relevant information on the content and the details of the projects and their feasibility.

A.2 Project features

The working group indicated the following project features:

a) Measurement of wrong delivery:

   — Delivery to the wrong address (and to the wrong person);

   — Delivery to the right address (but to the wrong person);

   — Delivery to the address indicated, but the recipient not living there;

   — Delivery to the wrong address (but to the right person).

b) Measurement of correct notification:

   — In products: Registered item, ensured items, parcels;

   — In real terms: Notification because of absence, notification taking place;

   — In content: Pick up address, pick up time, nature of the item.

WG1 felt unable to draft a standard including these multiple features each, especially in the light of the different approaches and regulations on these topics in the European countries. Therefore WG1 decided to wait for the first results of a test measurement on wrong delivery undertaken by Royal Mail.

Measurement on wrong delivery by Royal Mail:

In the UK Royal Mail's license requires the measurement of wrong delivery. Therefore Royal Mail set up a test measurement in 2006 using (parts of) the panel for the measurement according to EN 13850. The basic features of the measurement are to fill in diaries, telling the total number of items received and the number of items received wrongly (indicating the reason, if identified).

The test resulted as follows:

— wrong delivery is a relative rare event;

— in most cases, where a wrong delivery is recorded, there is a need to further investigate (by telephone);

— to receive statistical relevant results a big and wide-spread panel is needed.

The measurement of wrong delivery is insofar rather complicated and therefore also expensive.

Feasibility to create standardized methods:

c) Wrong delivery

The working group examined the UK experience in detail. Within the discussion it became obvious, that there is a wide range of the understanding of a "correct" delivery within Europe. Therefore a questionnaire has been distributed asking for the relevant characteristics to be considered when delivering an ordinary letter. The results of this survey are as follows:

Questionnaire "Correct Delivery of Mail" – Evaluation - What are the characteristics, a postman has to consider, when delivering an ordinary (not registered) letter (S = Single standing houses ; M = Multi-party houses):

Characteristic	**AT**	**CH**	**CZ**	**DE**	**DK**	**FI**	**FR**	**LT**	**LU**	**NL**	**PL**	**SK**	**UK**
Company		SM	SM	SM	M	SM	M	SM	M			SM	
First name		SM	SM	SM	M	SM	M	SM	M			SM	
Name		SM	SM	SM	SM	SM	M	SM	M			SM	
C/o		SM	SM	SM	SM	SM	M		M				
Street	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM
House number	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM
P.O.Box	SM	SM	SM	SM	M	SM	SM	SM	SM		SM		SM
Post code	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM		SM
Town	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM		SM
Country	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM	SM		SM
Stairs	SM												
Delivery point addition (Flat or floor number)	SM	M			SM	M	SM				M		
Object marking (name of a house, region etc)	S						SM						

This survey shows, that the requirement for a correct delivery differs from country to country (in 2 cases only the requirements are the same).

Taking into consideration the experience from UK indicating a complicated and high cost system as well as the not harmonized requirements within the related countries WG1 came to the conclusion that a standardized system for the measurement of wrong delivery is not feasible.

d) Correct Notification

As mentioned above a notification may have different origins: On the one hand there are different products where a notification may take place, there is one circumstance (absence of the receiver) when a notification should take place and there are different features a notification should contain rightly.

The event of a notification is rarer than a wrong delivery. Thus the statistical requirements and costs would even be higher. Thus the measurement by real mail may not be the solution.

A measurement by test mail is not practicable too, because the panelist would have to know in advance that a test item is on the way and then, on the date of delivery, should not open the door and wait for notification.

Also the question, of a correct delivered notification has to be considered when trying to make up a standardized system: Taking into account the results of the survey for wrong delivery with the wide range of possible requirements, the question whether or not a notification has been delivered correctly differs a lot within Europe.

Therefore the Working Group came to the conclusion that a standardized system for the measurement of correct notification is not feasible.

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