

## Introduction

In the week beginning 2 November 2009, Australia Post was alerted to the fact that Freshwater Management Pty Ltd (Freshwater Management) made a submission to the Australian Competition and Consumer Commission (ACCC) in response to the *Australia Post's draft price notification issues paper*, August 2009.

This document provides a response to the issues raised by Freshwater Management which we consider germane to the ACCC's assessment of our draft notification.

## Proposed Prices

Freshwater Management does not state an objection to, or support for, the proposed prices, rather details several issues that it '...would like the Commission to address in dealing with the submission by Australia Post for a price increase.'

## Delivery Standards and Performance

Page 1	Sends bulk lots (ranging from 20 to 100) letters at a time and has 'on numerous occasions' received complaints from the recipients that the letters were not delivered in time for them to attend a meeting.
	States that Freshwater Management has '...been able to confirm that the letters have taken 4 to 5 days to be delivered to addresses in the Sydney Metropolitan area and Central Coast of NSW.'
Page 1	Notes that Freshwater Management need to allow at least 4 days for delivery to ASIC in Victoria.
Page 1	Notes that non delivery is a lesser issue and that unless registered there is no means of proving non delivery.

As noted in Australia Post's Draft Notification of July 2009, Australia Post is required to meet prescribed performance standards relating to the frequency, speed and accuracy of mail delivery. Australia Post's delivery performance is independently monitored and, as with all prescribed performance standards, is subject to independent audit by the Australian National Audit Office.

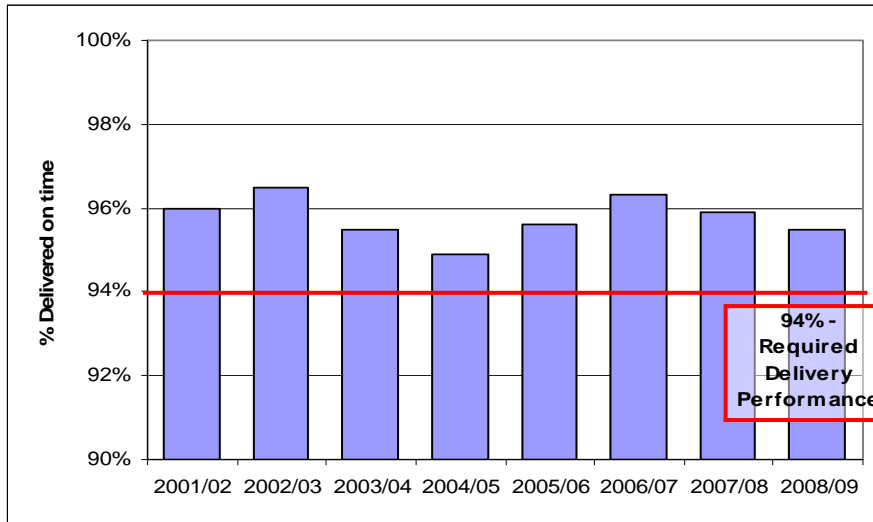
Australia Post continues to provide an efficient and effective postal service to the Australian community and our performance against the prescribed performance standards continues to exceed the required performance. The following Table shows our performance in 2008/09.

**Table 1 – Performance standards 2008/09**

Standard	Required Performance	Actual Performance
Number of street posting boxes	10,000	16,055
Delivery timetables	Maintained	Maintained
On time delivery of non bulk Letters	94%	95.5%
Points to receive deliveries five days per week	98%	98.8%
Points to receive deliveries no less than twice a week	99.7%	99.9%
Retail outlets	4,000 (2,500 in rural and remote areas)	4,433 (2,541 in rural and remote areas)

Furthermore, specific to the delivery performance of non-bulk letters, Figure 1 below shows the delivery performance since 2000/01. In each year Australia Post has exceeded the required delivery performance standard.

**Figure 1 Delivery Performance – Non-bulk letters 2000/01 to 2008/09**



Australia Post notes Freshwater Management’s observation that non-delivery is a lesser issue.

Australia Post’s Registered Post service (available with letters, regular parcels and prepaid Parcel Post satchels) provides a ‘proof of posting’<sup>1</sup> however, for those customers who want to receive confirmation of delivery, a *domestic delivery confirmation card* can be included for an additional fee<sup>2</sup>.

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<sup>1</sup> For articles presented at a post office counter accompanied by a Registered Post lodgement form.

<sup>2</sup> Excluding prepaid Parcel Post satchels