

From: Colin Barrow [colin.barrow@ntlworld.com](mailto:colin.barrow@ntlworld.com)

09/07/2007 09:22:55

To: Richard Chandler

Subject: Response To Amendment Of 2006 Licensing Framework Consultation

Richard,

I am a postman with Royal Mail but am responding to this consultation in a private capacity. With regard to the proposed changes listed in Appendix 1 of the "Amendment Of 2006 Licensing Framework Consultation":

\* Removing the need to give full details of how compliance with the Mail Integrity COP will be achieved and replacing this with a declaration by the applicant

I can see that this should reduce barriers to entry for smaller operators. I would suggest, however, that the requirement should be changed to being that the full details will be provided by the new operator within three months of commencing operations. By this time, it should be expected that the operator has the necessary procedures in place and can thus demonstrate compliance.

\* Current application fee of £1000 and annual licence fee of £1000 to be reduced to either £0 or £50 for the licence and to £0 for the annual fee

I believe that the application fee and annual fee for all operators regardless of turnover should be reflective of Postcomm's costs in dealing with the licence application and any ongoing costs which Postcomm have. If Postcomm's costs are high enough to form a barrier to entry for smaller operators then Postcomm should reduce that barrier by becoming more efficient and, if necessary, by removing any need for licensing for operators who intend to handle less than a specified volume of mail per year.

I have no comment to make on the other proposed changes.

Thank you for considering this response,

Colin Barrow

From: Tony Vitofski [tony@sirfox.plus.com](mailto:tony@sirfox.plus.com)

09/08/2007 11:40:17

To: Richard Chandler

Subject: Re: £1000 Licence Fee

Dear Richard,

As for your formal question, i have no objections whatsoever for you to use in any way my email from the other day. As to its value if any I am not sure!

My question regarding the £1000 fee has been answered to my satisfaction.

I would add however one additional thought regarding the Fee. For potential new entrants like myself, considering to enter, as it were on the cusp of a new Fee price, it would seem reasonable for the new entrant to pay the £1000 now, as per regulations, but that when/if a new fee is introduced, a back-payment of the difference between the original fee of £1000 and the new fee of £X be made.

e.g	Old Fee Payed now	£1000
	New Fee Introduced	£500 (for example),
	Repayment to Applicant	£500

Of course then maybe older Entrants would then wish for their original fee to be back-paid....to which i have no response knowing not the many issues related.

Best Wishes,

Mr Vitofski.

Richard Chandler wrote:

> Dear Mr Vitofski,

>

> I am just writing to you by way of a follow up to Mick Fews' e.mail to

> you of yesterday regarding the consultation on the licensing

> process to say that should you wish to send us your views on the

> licence fee, or indeed any of the other issues raised in the

> consultation document, they would be very welcome.

>

> Any response should be sent to me by close of play on Monday 20 August

> 2007. Alternatively, if you do not wish to respond seperately, we

> could, with your permission, refer to your e.mail of yesterday when

> evaluating replies. Perhaps you could let me know whether you would

> have any objection to that?

>

> Regards

>

> Richard Chandler

> Postcomm

> Licensing Team

> 0207 593 2184

From: Mick Fews

Re: £1000 Licence Fee

To: Tony Vitofski

Subject: Re: £1000 Licence Fee

Dear Mr Vitofski,

The consultation will close 20 August 2007. We aim to publish a decision document in November 2007 and implement the new regime from that point forward. Should Postcomm implement its proposal for a reduction in the application fee it will therefore take effect from November 2007.

I hope that this helps.

Regards

Mick Fews

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>>> Tony Vitofski <tony@sirfox.plus.com> 08/08/2007 10:23 >>>

Dear Mick,

This is just a general enquiry that i hope you can answer.

I understand Postcomm are conducting a review and consultation of the Licensing process that is due to conclude 20/8/2007, and that a follow up document is expected to be published in October.

As a perspective new entrant, i was simply wondering whether to hang on until October (in case the fee is substantially dropped) or to go ahead anyway since the follow-up document expected in October may not finalise this question.

The simple question really that i have is: by October, will this issue be settled completely and the Fee known definitively? If not then when could a rough estimation be given?

Best Wishes,

Mr Tony Vitofski.

**Postcomm's consultation  
on its proposed  
amendments to the  
2006 licensing framework:  
the Postwatch response**

**20<sup>th</sup> August 2007**

## Executive summary

1. Postwatch continues to support the introduction of competition in the postal market. To date, we believe that competition has created greater choice for consumers and has incentivised Royal Mail to deliver a better quality of service. We also believe competition has improved efficiency and driven innovation within the postal market.
2. Postwatch welcomes Postcomm's proposal to review the current licensing framework ensuring that it is relevant to today's postal market. We are aware that this is one part of a wider review of the licensing regime intended to determine whether it remains appropriate.
3. In forming a view on the proposed amendments, Postwatch considered Postcomm's rationale, paying particular attention to the suggested need for more SMEs in the licensed area. We appreciate that certain elements in the licensing application process may create barriers to entry for some potential operators. However, as a body representing consumers, our fundamental concern is the extent to which removing such 'barriers' may increase the risk to consumers (of questionable operators being given licences more easily), balanced against the possible benefits of encouraging more players to enter the market rapidly.
4. Postcomm claims that there should be significant opportunities for innovation in the postal market. It states further that innovation is often driven by new entrants able to offer innovative products and services within small niches. However, Postwatch questions whether having a larger number of licensed operators is the primary factor driving innovation or whether innovation is mainly driven by consumer 'choice'.
5. Postwatch questions whether choice and competition will be improved by the encouragement of large numbers of smaller players, or whether the presence of an excessive number of providers actually inhibits real choice and so works against the consumer interest. In the German postal market, around 775 of the smaller licensed operators have either completely ceased operation or been bought by larger operators.

## Introduction

6. Postwatch welcomes the opportunity to contribute to the consultation on Postcomm's proposed amendments to the 2006 Licensing Framework. Our complete independence from Government, the Regulator, Royal Mail and other licensed operators combined with our well-established formal network of contacts give us the ability to speak authoritatively on behalf of consumers throughout the UK.

7. In ensuring that our response broadly encapsulates the views of those we represent, Postwatch consulted with our Trade Association Forum, regional staff, committee members as well as members of our Mailers Consultative Group.
8. Our response below addresses the proposed amendments as listed in the consultation document.

#### Notice period

9. Postwatch's response to Postcomm's past consultations to grant licences has, in general, depended upon the information provided by Postcomm, amongst other sources. We think, therefore, that to commence the notice period before completing all relevant checks could diminish the ability of Postwatch, and that of other stakeholders, to put together an objective and well informed view.
10. Postcomm asserts that its rationale for proposing to introduce the notice period at an earlier stage is to prevent delays where a license is ready to be granted. However, Postwatch has not been informed of any licensed operator who has had major problems with the current procedure.
11. Postwatch believes Postcomm should continue to complete all relevant checks before it issues a 28 day consultation as this would assist respondents in forming an objective view.

#### Establishing minimum standards for entry into the market – Mail Security Measures

12. Postwatch does not support Postcomm's proposal to remove the *ex ante* Mail Integrity (MI) Code checks from the licence application process, replacing this with a declaration.
13. For the benefit of consumers, Postwatch strongly recommends that applicants who cannot demonstrate how they will comply with the MI Code at this stage should not be granted a licence. In Postwatch's view, the principal purpose of the *ex ante* MI checks is to ensure the integrity of the mail is upheld, which Postwatch deems vital.
14. Postwatch is aware that the *ex ante* checks may require some time and resources to be invested. However, if such a limited investment is likely to discourage potential entrants, Postwatch would question how committed such operators are about entering the market. We believe that such checks should be viewed as protection for customers and not as a barrier to entry.
15. Additionally, if a declaration is provided and is truthfully followed, Postwatch fails to see how the burdens of the *ex ante* checks are removed, since to comply with the declaration, potential operators must still "ensure that their processes are compliant before operations commence", as is the case with the *ex ante* checks.

## Establishing minimum standards for entry into the market – Common Operational Procedures

16. Postcomm's primary objective for proposing amendments to the current licensing framework is to encourage potential operators, particularly SMEs, to enter the postal market. From our point of view, the underlying factor is to provide the public greater choice and a better overall quality of service whilst preserving the integrity of mail. In ensuring this, we maintain that it is vital that potential operators continue to demonstrate 'how' they will comply with the Common Operational Procedure Code.
17. There is a possibility that more competitors will enter the market, which could create confusion for consumers in areas specified in question 14<sup>1</sup> of the application. Postwatch accepts there are potential benefits in creating a less onerous licensing regime but these benefits should be weighted against any potential decrease in the integrity of mail.
18. Postwatch considers the current requirement relevant to consumers, particularly as there is potential for more operators to become active in the future. We agree that Postcomm's enforcement powers should ensure compliance but we believe it is equally important that applicants continue to consider how they would adhere to the MI and Common Operational Procedure Codes.
19. These two Codes should not be compromised, for although larger operators may not require them given their brand names, smaller operators will require security measures to guide them and to protect customers.

## Data Protection Act – registration

20. Postwatch recognises that as business entities, all licensed operators are required to notify the Information Commissioners (IC) of any information processed, and its use.
21. Postwatch takes the view that the requirement remains a necessity. We do not believe it poses a barrier to entry into the market and it should not create any major additional work for Postcomm.

## Fitness and propriety of an operator

22. In the consultation document, Postcomm states that the requirement for operators to apply for Criminal Record Bureau (CRB) checks was retained after the introduction of the MI Code because, at the time, it felt that there might be a

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<sup>1</sup> Currently, question 14 of the application requires all licence applicants to provide details of how the licensee proposes to comply with the Common Operational Procedures Code of Practice (condition 4 of the licence)

considerable number of licence applicants. With the present fewer than expected number, Postcomm now deems the checks unnecessary and sees it as a duplicate safeguard because of the MI Code.

23. With the above in mind, Postwatch considers it necessary to retain this requirement, especially as there is the potential to have a larger number of entrants as the market develops. We believe it is important to have in place a precautionary system to safeguard the postal market, preventing the entry of inappropriate operators. The MI Code, supplemented by CRB checks provides the market with secure measures ensuring that only companies of sound reputation and operated by credible individuals are granted licences.
24. Postwatch also notes that the current MI Code requires that licensees undertake checks on its employees. However, without the CRB checks there would be no fitness/propriety requirement on actual licensees (Directors). Postwatch therefore considers it important that the current CRB checks remain in the licensing application process.

#### Application and annual fees

25. Postwatch does not believe that reducing (or eliminating) the application fee or annual fee would pose any problems for new licence applicants or raise any significant concerns for Postcomm. We believe it is important to new entrants, particularly SMEs, to have few unnecessary hurdles when considering possible entry into the postal market.

#### Financial guarantee

26. Postwatch opposes Postcomm's decision to remove the requirement for a financial guarantee which allows for the clearance of mail should the licensee cease to operate. Postcomm has stated that it would be willing to discuss other procedures with individual companies and Postwatch is of the view that a conclusive view cannot be reached until Postcomm has consulted on, or proposed, other options.

#### Licensing in other countries – Germany

27. In the consultation document, there are many references to the postal market in Germany but Postwatch questions the relevance of the information. Postcomm states "in Germany, there has been considerable growth in the number of licensed SMEs from 42 at the end of 2000 to 140 at the end of 2004". On reviewing this information, it has been drawn to Postwatch's attention that the increased figure Postcomm quotes relates not to small and medium enterprises but solely to medium sized companies<sup>2</sup>.

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<sup>2</sup> Federal Network Agency Annual Report 2005 (Pg 91)

28. Postwatch requests that clarification be made on whether Postcomm is looking for growth in the medium sized business sector (50-249 employees) or the medium and small size (01-249 employees).
29. In a more recent annual report, Postwatch notes that to date, in the German Postal Market, 2245 licences have been issued, 775 licensees have withdrawn from the market and, of the 1470 remaining current licensees, only about 750 are active in the market<sup>3</sup> partly as a result of insolvencies of businesses, wind ups, and acquisitions. It might therefore be tricky to compare certain aspects of the postal market in Germany with that in the UK, particularly in view of the differences in the structure of the economies. This potentially undermines the comparison with the UK. Moreover, a number of operators have more than one licence. It is also worth noting that the German postal market opened to competition in 1997, a period when the German economy was not booming.
30. Postwatch also notes that the weight of items under the German licensing regime is greater than that in the UK and that the number of services requiring a licence is greater<sup>4</sup>.
31. Postcomm needs to consider the reasons why there are larger numbers of small businesses in the German licensed postal sector. Postwatch is not convinced that creating a lighter-touch licensing regime will necessarily encourage smaller businesses to enter the market in the UK.

#### Other issues

32. Postwatch notes that in the agency access agreements two of the other licensed operators have recently agreed with Royal Mail. We welcome this step as the removal of the full VAT burden on alternative operators will make the marketplace more appealing to new entrants. Postwatch believe there are other ways of enticing SMEs to enter the market that do not put the integrity of mail at risk.
33. To reiterate a point raised in our 2005 response, it may also be appropriate at the second licensing review stage to consider whether the scope of licensing should remain at 0-350grams and below £1.

#### Conclusion

34. Postwatch has raised a number of concerns in this response, in particular, we believe the overall drive behind this consultation is not sufficiently clear. Although we welcome competition and Postcomm's endeavours to address barriers to entry in the market, there does not appear to be any sound justification for attracting smaller players into the market and no evidence-base is apparent to support this as a successful means of developing competition for customers.

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<sup>3</sup> Federal Network Agency: Annual Report 2006 (Pg 116)

<sup>4</sup> Under the German Postal Act, a licence is needed for the collection, transportation or distribution of domestic items of correspondence, addressed direct mail and incoming cross border mail weighing up to 1,000 grams



## **CWU SUBMISSION TO POSTCOMM CONSULTATION - AMENDMENT OF THE 2006 LICENSING FRAMEWORK**

### **Introduction**

1. The Communication Workers Union (CWU) represents around 250,000 employees in the postal, telecom and related industries. It is the recognised union in the Royal Mail Group for all non-management grades including those responsible for the collection, sortation and delivery of letters and parcels.
2. In May 2007 Postcomm published a consultation document proposing amendments to the licensing framework for implementation in late 2007 as well as a fundamental review of the framework to take place in 2008.
3. Postcomm's current consultation document proposes the following amendments to the framework and applies to postal operators other than Royal Mail:
  - a. Refine Postcomm's internal procedures for processing licence applications to ensure they are proportionate in a liberalised market;
  - b. Remove the annual fee for all licensees with a turnover below £10 million and reduce the application fee to zero or £50 for all applicants;

- c. Remove the requirement to provide information as part of the application process about how certain licence conditions will be complied with; and
- d. Remove the requirement to provide a financial guarantee from existing licensees and future applicants.

## **CWU Response**

- 4. The CWU does not support Postcomm's proposed relaxation of the licensing regime for private mail operators. The protection of mail integrity, the reputation of the UK mail industry and the broader interests of mail users must remain the primary goals of the licensing regime. We believe the regulator's proposals threaten these goals and are unwarranted. We have not seen sufficient evidence to conclude that conditions have changed significantly since Postcomm decided upon the current licensing framework in August 2005. Furthermore, we consider it inappropriate for Postcomm to propose significant changes to the licensing framework ahead of its fundamental review of the framework due in 2008.
- 5. We do not believe that the current ex-ante checks incorporated into the application process place an onerous burden on applicants. They may act as a minor barrier to entry, but only in so far as they deter those applicants who are unable or unwilling to meet the standards necessary to function as reliable and competent mail operators.
- 6. The CWU's response to Postcomm's specific proposals are outlined below. In addition, rather than relaxing the licence conditions, we would like to see Postcomm strengthen the requirement for Royal Mail's competitors in relation to the monitoring of quality of service. We believe Postcomm and/or Postwatch should take a far more active role in this

regard. Recent research from Postwatch<sup>5</sup> has highlighted the value of quality of service information for those considering switching postal operator. 74% of small to medium-sized businesses reported that information on the number of complaints a postal operator had received would be either 'very' or 'extremely useful'.

7. Together with Postwatch, we believe that it would be beneficial for postal operators to publish their own performance data in direct mail and on their website, as this is often the only source of information customers access regarding the mail market. Clear advertisement of the availability of comparison information should be made available on Postwatch and Postcomm's website. Just as investors are protected by the obligations placed upon companies to publish financial information – such as the new London Stock Exchange rules requiring the Alternative Investment Market to publish financial information online – the regulator should help customers make informed choices by requiring all postal operators to publish price and performance measurements against fixed and comparable benchmarks.
8. Other regulators have taken an active role in ensuring consumers have the information they need to make informed choices. The Financial Services Authority (FSA) works to inform consumers by facilitating the comparison of financial products through its website. The FSA's 'Treating Customers Fairly' initiative also aims to ensure firms provide customers with 'simple and understandable information' and that products and service standards are acceptable and as customers have been led to expect.

## **Postcomm's Proposals**

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<sup>5</sup> "Understanding SME customer ( $\geq 250$  letters per day) needs beyond Condition 2 requirements" (Postwatch & RS Consulting, May 2007)

### Notice requirements

9. In future Postcomm is proposing to publish licence proposals as soon as they have received all the information necessary for the application to be assessed but before the licensing checks have been satisfactorily completed. The CWU would rather see the current arrangements remain in place. We feel that putting forward license proposals to the public before there is any guarantee that the applicant will be successful places an unnecessary burden on third parties to assess proposals and make representations to Postcomm that may ultimately prove needless.

### Mail security measures

10. Postcomm is proposing to remove the requirement for applicants to explain in their application how they will establish the security arrangements required by the Mail Integrity Code. Postcomm believes this requirement is too burdensome for smaller operators and can delay their application.

11. The key purpose of the licensing regime remains the safeguarding of the postal system from abuse. Removing the requirement for applicants to show how they intend to follow the Mail Integrity Code will not further this objective. Explaining how they will comply with the code forces applicants to consider the code in detail; we do not believe the requirement to be onerous as it is essential that applicants consider and plan how they will comply ahead of entering the market. The requirement is only likely to act as a barrier to entry other than to applicants who are unprepared to make the necessary arrangements to comply with the licence.

### Common operational procedures

12. Postcomm is proposing to remove the obligation for applicants to explain how they will comply with the Code of Practice for Common Operational

Procedures. Instead applicants will only be required to declare they have understood the code's requirements and will comply with them in full. Postcomm argues that the current application requirement is of little value because applicants are not currently required to provide copies of their detailed standard operating procedures and they do not undertake any site visits relating to applicants' compliance with the code.

13. As in the case of the Mail Integrity code, the CWU is strongly opposed to relaxing the current application requirements. We believe there is value in requiring applicants to provide an explanation of how they intend to comply with the code. Careful consideration of how they will comply is essential before any applicant enters the market. If applicants find this too burdensome, it would suggest that they are unlikely to be in a position to comply. If Postcomm believe that there is too little value in these checks they should be seeking to make them more robust, rather than looking to remove them altogether.

#### Data Protection Act 1998

14. Applicants are currently required to provide Postcomm with a copy of their Data Protection Act registration entry. Postcomm is proposing to no longer check whether applicants have notified the Information Commissioner or the terms of the register entry. Instead, they will only provide applicants with guidance on relevant data protection issues.

15. The CWU recognises that the need for compliance with the Data Protection Act applies regardless of Postcomm's licensing regime. Nevertheless, data protection issues are inextricably linked to mail integrity and consequently Postcomm should be seeking to ensure compliance above and beyond that provided by the Information Commissioner. As applicants are obliged to register under the Data Protection Act we see no harm or unnecessary burden in Postcomm

checking this registration. Moreover, we believe it acts as an extra incentive for applicants to ensure that they are compliant. We do not believe this aspect of the application procedure acts as a barrier to entry; if applicants find this too onerous, it would also imply that they find meeting the conditions of their licence and the Data Protection Act too onerous and consequently should not be successful in their application.

#### Fitness and propriety of operators

16. Postcomm currently requires each applicant to declare whether they have any disqualification under the Company Directors Disqualification Act 1986, or any other unspent convictions or pending investigations. Applicants must apply for Basic Disclosure from the Criminal Records Bureau (CRB). Postcomm is proposing that the current requirement for Basic Disclosure should be removed from the application process as it feels CRB checks have acted as a duplicate safeguard since the introduction of the Mail Integrity code.

17. The CWU does not agree with Postcomm that the recruitment policy requirements of the Mail Integrity code act as a suitable replacement for Basic Disclosure. The Code states that:

*“The recruitment policy should include: ...*

- a. a requirement for prospective Relevant Employees to declare any criminal conviction or any cautions or conditional discharges for offences relating to:*
- b. Postal Packets; or*
- c. Dishonest conduct generally (in particular, theft, obtaining property by deception or fraud)”*

However, it is not clear how the policy applies to ‘controlling persons’ who may own or be in charge of the applicant company but have no access to

postal packets in the course of their work. The code states only that it applies to 'relevant employees', which are defined as:

*“permanent, temporary, casual or part-time employees or workers (including those under contract for service), who are (or may be) involved in conveying, receiving, collecting, sorting, delivering or otherwise handling Code Postal Packets or who are reasonably likely to have access to Code Postal Packets in the course of their work”.*

18. Postcomm applies no ex-ante checks for compliance with the Mail Integrity code, other than requiring applicants to explain how they intend to comply. It now plans to relax this requirement to only a statement of intent to comply. Postal users must have the utmost confidence in the confidentiality and reliability of postal services. We do not believe this proposal would provide sufficient assurance of the fitness or propriety of the 'controlling persons' of an applicant company as it leaves initial compliance with the code entirely down to the goodwill of the applicant.

#### Application and annual fees

19. Applicants for licenses currently pay an application fee of £1000 together with an annual fee of £1000 where turnover is below £10m. Above £10m a formula determines how much a licensee will pay. Postcomm believes these current levels of payment act as a barrier to entry for small to medium-sized businesses. Postcomm thus proposes lowering the application fee to zero or £50 for all applicants and removing the annual fee for licensees with a turnover below £10m.

20. The CWU would prefer to see the current application fee remain as we believe it is important that prospective postal operators make an adequate contribution to the cost of the application process. To encourage smaller operators to enter the market Postcomm is now proposing to scrap the

annual licence fee for licensees with a turnover below £10m. We do not accept that smaller operators should be advantaged in this way; instead we believe that the licence fee should be set at a level proportionate to the operator's annual turnover.

#### Financial guarantee and alternative options

21. Postcomm is proposing to remove the requirement for applicants to secure a guarantee of sufficient funding to clear mail in the course of conveyance if the company should fail. The guarantee is currently based on a level of 50p per mail item for two week's mail volumes.
22. The CWU strongly opposes the removal of the financial guarantee. We do not accept Postcomm's argument that because the guarantee has not been called upon in the two cases of operators having to withdraw from the UK market, it is therefore superfluous. Rather, we see this as a sign of the success of the current licensing regime, in that only firms able to clear mail in the event of their failure have entered the market.
23. Postcomm argues that the costs associated with obtaining the guarantee are relatively higher for smaller firms and consequently this acts as a barrier to entry. We recognise that this might be the case but we believe that the risk to mail integrity and the reputation of the wider postal industry posed by the failure of an operator without guarantee is greater.
24. We are surprised that Postcomm believes it appropriate to remove the financial guarantee in the absence of any other mechanism for handling the mail of a failed operator. In its consultation document the regulator states that: *"Postcomm is developing arrangements to deal with operator failure and will discuss these with industry in due course."* This does not go far enough. The current requirement for a financial guarantee should

remain in place in the absence of any agreed arrangements for dealing with operator failure.

#### Operator's financial position

25. Postcomm has argued that it does not believe it has a duty to ensure all licensees are able to remain solvent in the market and therefore does not propose to undertake financial assessments of applicants. As we have argued previously, we firmly believe that any financial failure of a licensed postal operator may materially damage the reputation of the wider postal market. We therefore believe the regulator should reconsider and look to reinstate the financial assessment of applicants.

#### **Conclusion**

26. The CWU maintains the importance of a robust licensing regime which protects customers and the reputation of the postal industry from the actions of incompetent or unscrupulous operators. We believe the licensing framework is insufficient in its current form and are calling on Postcomm to introduce a licence requirement for the mandatory publication of directly comparable performance data by private postal operators.

27. The CWU is strongly opposed to Postcomm's proposed erosion of the minimum standards for entry and the removal of the financial guarantee. Customers will not be adequately protected by this deregulation of the licensing regime. Moreover, we believe it is inappropriate for Postcomm to seek to make significant licensing changes ahead of its fundamental review of the licensing framework scheduled for 2008.

For further information on the view of the CWU contact:

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