Net Cost of the Universal Postal Service and Financing Options Experiences from Europe

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Who is WIK-Consult?

- WIK ('Scientific institute for infrastructure and communication services')
 - Independent research institute, owned by the German government
 - ~ 40 consultants/researchers
 - 25 years of experience with economic regulation and sector policies
 - Telecommunications, postal and energy markets
- WIK-Consult is a 100% subsidiary of WIK
 - Consultancy specialised in regulated industries, founded in 2001
 - ~ 60% of revenue from customers outside Germany



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USO: universal (postal) service obligation

USP: universal service provider

What are USO Net Costs?

- Cost of universal service ('gross cost')
 - Total expenditure for operating universal postal services (as per financial regulatory accounts)
 - This cost is normally covered by revenues from customers
- Net cost of universal service (= cost of universal service <u>obligation</u>)
 - Theoretical concept, cannot be observed directly
 - Net cost is additional cost (or lost profit), that results from the USO
 - Net cost is not the loss/profit reported for US in financial accounts
 - → This cost is created by legislative requirements, and may be compensated



USO Net Cost Definition

Key question:

Which services and service elements would a commercial postal service provider discontinue / which customer groups would the company stop serving without a USO compared to a postal service provider with a USO?

Calculation: Comparison of profits in two scenarios

USO net cost =
$$(Revenue - Costs)_{with USO}$$

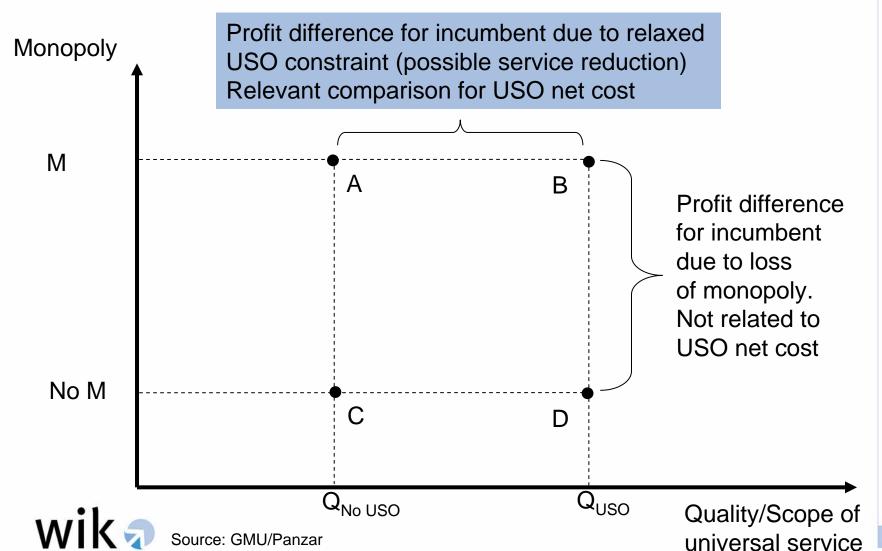
- $(Revenue - Costs)_{without USO}$

→ 'Profitability cost approach' (Panzar/Crèmer)



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USO Net Cost "Commercial Scenario": Liberalization and Quality of USO



USO Net Cost Role of USO Net Cost in European Postal Law

Why calculate?

Precondition for external funding

Who calculates?

Universal service provider? Regulator?

How?

(No generally accepted practice to date)

Who verifies?

Regulator! (USP shall cooperate)



(State aid control by European Commission)

USO Net Cost How Calculate? Requirements of 2008/6/EC, Annex 1

Purpose	 Precondition for external funding Article 7 (3): "Where a Member State determines that the USO [] entail a net cost, and represent an unfair financial burden on the USP []"
Services or service elements considered	Elements of services provided at loss or under cost conditions falling outside normal commercial standards
	 Specific users or groups of users served at loss or (revenues not cost-covering due to social, uniform, or affordable tariffs)
	 Calculation to be made separately and must avoid double counting of same aspect (element or user group)
Cost concept	Avoided cost
Reference scenario (no USO)	Same postal operator without a USO
Cost & revenue effects	 Assessment of 'net cost' effects and of benefits to the USP ('intangible and market benefits')



USO Net Cost Survey of USO Costing Methodologies

- Australia / Australia Post
- Belgium / BIPT (postal regulator)
- Denmark / Danish Competition Authority (2007)
- Denmark / Copenhagen Economics (2007)
- France / La Poste
- Norway / Norway Post
- Switzerland / Swiss Post
- United Kingdom / Postcomm (postal regulator, 2001)
- United Kingdom / Frontier Economics (2008)



Discussed in this presentation

USO Costing Methodologies Danish Chamber of Commerce (2007)

Purpose	Inform postal policy (no legal mandate)
	 Model prepared by Copenhaguen Economics for the Danish Chamber of Commerce
Services or service elements considered	Nationwide delivery
	6-day-delivery
	Routing time targets, etc.
Cost concept	Incremental costs (estimated bottom-up)
Reference scenario without USO	Alternative business model of Post Danmark (absent the USO)
	- Delivery frequency down from 6 to 5 days per week
	- Free services for blind discontinued
Cost & revenue effects	"First round" revenue effects only
	 Longer term effect supposedly considered in developing "realistic"
	alternative business model
Result (2005)	 DKK 150m (US\$ 32m) – approx. 1.5% of operating expenses
	 Report argues previous analysis by Competition Authority does not reflect a "commercially viable business model"



USO Costing Methodologies Norway: Norway Post

Purpose	Determine subsidies from state budget (discontinued in 2006, re-introduced in 2009)
Services or service elements considered	Frequency of delivery (by area)
	Retail network
	Free services to the blind
	Non-uniform tariff / surcharge to Spitsbergen (remote island)
Cost concept	Incremental costs
Reference scenario without USO	"Commercial business model" determined by Norway Post
	 Delivery frequency down to 5 days for 15 % of population and down to 2 days for 5 % of population
	- "Mobile post offices" reduced by half (approx. 2,000)
	- Introduce charges for services for the blind
	- Surcharge fro mail to and from Spitsbergen
Cost & revenue effects	Revenue effects are taken into account in determining the reference scenario
Result (2006)	 NOK 253m (US\$ 50m) / 2.3 % of operating expenses



USO Costing MethodologiesSwitzerland: Swiss Post

Purpose	Legislation requires report of "infrastructure contribution"No external funding
Services or service elements considered	 Branch network: mail acceptance and sales, including financial services Mail transportation Delivery
Cost concept	 Branch network and transport: Incremental costs Delivery: Difference between average delivery costs in "high-density" areas (per household) and actual delivery costs in "low-density" areas
Reference scenario without USO	 Branch network and transportation: # of retail outlets from 2,500 to 600 (benchmark: bank counters) Delivery: Coverage from 100% of households to 70% (benchmark: private newspaper delivery)
Cost & revenue effects	Not considered
Result (2007)	~ CHF 500m (US\$ 501m) / 7.8% of operating expenses



USO Costing MethodologiesLessons from Practice in Europe

- Two categories of approaches
 - Older approaches relate to "product" accounts, (= no explicit reference scenario)
 - More recent approaches relate to elements of the USO (= explicit reference scenario)
- Consensus in recent models: Profitability cost approach
 - Calculate change in incumbent profits due to relaxing the USO
 - How would the USP change service levels if USO was relaxed?
- Most important areas for service degradations (without a USO)
 - 1. Reduced frequency of delivery (possibly in rural areas only)
 - 2. Post office closures and conversion to contracted agencies
 - 3. Remove "social prices", e.g. free service for the blind



USO Financing in European

- Original Postal Directive (1997)
 - Member State allowed to preserve monopolies "to the extent necessary to ensure the maintenance of universal service", plus maximum weight and price limits
- 2011 (Third Postal Directive)
 - "Where a Member State determines that the universal service obligations, as provided for in this Directive, entail a net cost [...] and represent an unfair financial burden on the universal service provider(s), it may introduce:
 - (a) a mechanism to compensate the undertaking(s) concerned from public funds; or
 - (b) a mechanism for the sharing of the net cost of the universal service obligations between providers of services and/or users."(Article 7.3, Directive 2008/6/EC)



USO Financing Options

- USO Funding necessarily is a second step
- First step must be to prove that there is a USO net cost at all

Monopoly

- Pro
 - No change needed
- Con
 - Difficult to balance value to need
 - May not raise sufficient funds
 - No incentives for USP to reform
 - Difficult and costly to police

Compensation fund

- Pro
 - All customers contribute according to their demand
- Con
 - Costly to operate
 - May not raise substantial funds
 - Violates 'tax incidence rule': Senders pay what government has 'ordered'

State budget

- Pro
 - Accords to 'tax incidence rule': Government set rules, and pays for outcome
 - Least transaction cost
- Con
 - Adds to public spending, may increase deficits



Conclusions

- USO net costs provide sound conceptual basis for safeguarding universal service in a liberalised market
- Emerging consensus on methodology for USO net cost in Europe (and the USA) – but complex technical exercise!
- If any ,unfair' USO net cost exists, direct subsidies appear superior to compensation funds





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