

B I P T

**BELGIAN INSTITUTE FOR POSTAL SERVICES
AND TELECOMMUNICATIONS**

**BIPT COUNCIL COMMUNICATION
OF 08 NOVEMBER 2019
REGARDING
THE ASSESSMENT OF THE BPOST TARIFFS SELECTED WITHIN THE
FRAMEWORK OF THE EUROPEAN REGULATION ON CROSS-BORDER
PARCEL DELIVERY SERVICES**

Non-confidential version

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1 Introduction

As of this year, postal operators providing cross-border parcel delivery services within Europe, have to comply with the obligations resulting from the new EU Regulation 2018/644 of 18 April 2018 on cross-border parcel delivery services (hereafter: Regulation). This Regulation aims to continue to support e-commerce within Europe, to increase transparency on the postal market and, where applicable, to point out any unjustified differences between domestic and cross-border tariffs.

The markets for cross-border parcel delivery services are diverse and complex, with different providers offering different services and prices. Those differences depend on weight, size and format of parcels sent, as well as on their destination, speed of delivery, any added value features, such as traceability systems, and the number of parcels sent. That diversity makes it hard for small and medium-sized users to compare parcel delivery services offered by different providers, in terms of quality and price, because they are often not aware of the existence of different parcel delivery options for similar services in cross-border online trade.

Since the end of 2018 providers of parcel delivery services are obliged under the Regulation to register one time on the BIPT website, where they must fill out the basic information required regarding their company. In addition, each year, certain companies have to provide statistical data to the BIPT, as well as feed their tariffs into a web tool created by the European Commission.¹ Postal operators providing parcel delivery services to and from - one or more - European Member States have to provide statistics and to report the tariffs for those services, if on average they employed 50 or more people during the previous year (including subcontractors) or if they are established in several EU countries.

More transparent and easier comparable prices of cross-border services should reduce the unreasonable differences between tariffs, including, where applicable, unjustified differences between domestic and cross-border tariffs. Based on an analysis made by the European Commission, tariffs are often relatively high and also vague and obscure.² According to the European Commission transparency and affordability of single-piece tariffs need to be improved for the further development of e-commerce. Therefore the Regulation tasks the national regulators with making an objective assessment of cross-border single-piece tariffs.

2 Legal basis

A draft regulation on cross-border parcel delivery services was submitted by the European Commission on 25 May 2016. The Regulation itself was signed on 18 April 2018 and entered into force on 22 May 2018.

¹ <https://webgate.ec.europa.eu/parcel/>

² See considerations 1 and 8 of Regulation 2018/644 of the European Parliament and of the Council on cross-border parcel delivery services.

The foundation for this communication can be found in Articles 4 up to and including 6 of the Regulation. Under Article 4 of the Regulation all parcel delivery service providers providing cross-border parcel delivery services should submit information to the BIPT, assuming this provider employed at least 50 persons on average over the previous calendar year or assuming that provider is established in more than one Member State.

Companies providing single-piece postal item delivery services, should provide the public list of tariffs for the products listed in the annex to the Regulation by 31 January of each year, as laid down in Article 5.

In accordance with Article 6 of the Regulation³ the BIPT should objectively assess the cross-border tariffs for the single-piece postal items that are subject to the universal service obligation of the designated universal postal service (hereafter: USP) provider originating in its Member State - namely bpost - in order to identify those tariffs that it considers to be unreasonably high.

When making its assessment the BIPT has used the filter mechanism mentioned in the Communication from the European Commission on guidelines to national regulatory authorities on the transparency and assessment of cross-border parcel tariffs pursuant to Regulation (EU) 2018/644 and Commission Implementing Regulation (EU) 2018/1263 (hereafter: Guidelines).^{4,5} When assessing the tariffs bpost and the BIPT have to take into account the elements listed in Articles 6.2 and 6.3 of the Regulation and also consider the guidelines.

³ Article 6 of the Regulation lays down: "1. On the basis of the public lists of tariffs obtained in accordance with Article 5, the national regulatory authority shall identify, for each of the single-piece postal items listed in the Annex, the cross-border tariffs of the parcel delivery service provider that originates in its Member State and that are subject to a universal service obligation that the national regulatory authority objectively considers necessary to assess. 2. The national regulatory authority shall objectively assess, in accordance with the principles in Article 12 of Directive 97/67/EC, the cross-border tariffs identified under paragraph 1 in order to identify those cross-border tariffs that it considers to be unreasonably high. In that assessment, the national regulatory authority shall in particular take into account the following elements: (a) the domestic and any other relevant tariffs of the comparable parcel delivery services in the originating Member State and in the destination Member State; (b) any application of a uniform tariff to two or more Member States; (c) bilateral volumes, specific transportation or handling costs, other relevant costs and service quality standards; (d) the likely impact of the applicable cross-border tariffs on individual and small and medium-sized enterprise users including those situated in remote or sparsely populated areas, and on individual users with disabilities or with reduced mobility, where possible without imposing a disproportionate burden. 3. In addition to the elements in paragraph 2, the national regulatory authority may, when it considers it to be necessary, in particular also take into account the following elements: (a) whether tariffs are subject to a specific price regulation under national legislation; (b) abuses of dominant market position established in accordance with relevant applicable law. 4. The Commission shall set out guidelines on the methodology to be used in respect of the elements listed in paragraphs 2 and 3. 5. For the purposes of the assessment referred to in paragraph 2, the national regulatory authority shall, when it considers that it is necessary, request any further relevant evidence in relation to those tariffs that is needed for the assessment to be made. 6. The evidence referred to in paragraph 5 shall be provided to the national regulatory authority within one month of receipt of the request, together with any justification of the tariffs under assessment. 7. The national regulatory authority shall submit its assessment to the Commission by 30 June of the relevant calendar year. In addition, the national regulatory authority shall provide a non-confidential version of that assessment to the Commission. 8. The Commission shall publish the non-confidential version of the assessment provided by the national regulatory authorities without delay and in any event within one month of receipt."

⁴ Communication from the European Commission of 12 December 2018 on guidelines to national regulatory authorities on the transparency and assessment of cross-border parcel tariffs pursuant to Regulation (EU) 2018/644 and Commission Implementing Regulation (EU) 2018/1263; https://eur-lex.europa.eu/resource.html?uri=cellar:4fd5f9aa-fdf8-11e8-a96d-01aa75ed71a1.0023.02/DOC_1&format=PDF.

⁵ The filter mechanism laid down in the Guidelines of the European Commission of 12 December 2018 will be explained in section 4.

For the purposes of the assessment referred to in Article 6.2 of the Regulation Article 6.5 authorises the BIPT to request any further relevant evidence in relation to those tariffs that is needed for the assessment to be made. The evidence referred to should be provided within one month of receipt of the request, in accordance with Article 6.6 of the Regulation.

3 Background

On 5 April 2019, the European Commission published all public tariffs for all EU Member States of cross-border products and services listed in the annex to the Regulation. On 10 May 2019, the European Commission informed the BIPT about which tariffs of bpost, as the Belgian designated universal service provider (hereafter: DSUP), had been selected using the filter mechanism (Section 4 below).

Based on that selection, for the purpose of carrying out the assessment, the BIPT sent a letter to bpost on 22 May 2019 with specific questions about the selected tariffs, pursuant to Article 6.5 of the Regulation. Bpost answered this request for information on 21 June. The BIPT asked a number of additional questions on 10 July 2019. The latter questions were answered by bpost on 2 August. On 26 August 2019 the draft communication was sent to bpost so that any confidential sections could be indicated and any comments could be given. On 12 September 2019, the BIPT received the comments and confidentiality indications from bpost. Next, a second draft communication was established by the BIPT and sent to bpost on 15 October. On 25 October, some new comments and confidentiality indications were received from bpost. Based on all this input the BIPT drew up a final communication with a confidential and non-confidential version, which was communicated to bpost on 8 November 2019.

4 Selection of the tariffs to be assessed

Based on point IV of the Guidelines the European Commission has applied a filter mechanism on a list of cross-border tariffs in all EU28 Member States for each of the 15 categories of single-piece postal items referred to in the annex to the Regulation.

This method offers the advantage that an EU28-wide comparison can be made on a selection of the tariffs offered by the designated universal service provider in every member state. Moreover, it is a simple and clear mechanism, which does not rely on costs and proxies for cost, which are part of the assessment process discussed further on in this communication.

In order to have a consistent comparison, the published tariffs are PPP adjusted, as determined by Eurostat.⁶ Next, a filter is applied so that only the highest tariffs are taken into consideration for an in-depth analysis in the form of an assessment.

⁶ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=prc_ppp_ind&lang=en

In the case of the reported 2019 and 2020 single-piece tariffs this involves the upper 25%. In the future this percentage will progressively be lowered. This is done in close cooperation between the European Commission, the national regulatory authorities and the ERGP.⁷

By means of the European Commission's pre-assessment filter 175 bpost tariffs have been selected that have to be assessed:⁸

- 0.5 kg standard letters to the 30 EEA countries;
- 1 kg standard letters to the 30 EEA countries;
- 2 kg standard letters to the 30 EEA countries;
- 0.5 kg registered letters to the 30 EEA countries;
- 2 kg registered letters to the 30 EEA countries;
- 1 kg track and trace parcels to 25 EEA countries.⁹

5 Methodology of the assessment

A first step in this assessment is to benchmark the selected bpost cross-border tariffs against 1) comparable tariffs of DUSPs in the country of destination, 2) comparable tariffs of commercial competitors in the country of origin (Belgium) and 3) the sum of the domestic tariffs (Belgium + DUSP tariff in the country of destination) plus the international transportation costs (between Belgium and the country of destination).

Pursuant to the Guidelines of the European Commission, the assessment next consists of the analysis of the volumes and the costs. As for the volumes, in case detailed information per product type is unavailable, an analysis will be made based on total volumes per country, divided into incoming and outgoing letters and postal parcels.

As to costs, for each product type a division is made according to operational activities. Then, these costs are aggregated per product and compared to the applicable tariff in order to determine the Return on Sales ratio or simply RoS margin¹⁰. Apart from that the effect of uniform tariffing will also be considered, as well as a potential net revenue effect of the mix between outgoing and incoming letters and parcels. In addition, the cost orientation of the selected tariffs is checked.

Finally, the impact of the selected tariffs on vulnerable postal consumers is examined.

6 Assessment

When interpreting the assessment the reader should be aware that the weight categories determined by the European Commission, as described in the annex to the Regulation, do not necessarily correspond with the weight categories used by the postal operators falling under this Regulation. For instance, as for (European) standard letters bpost does not make any distinction between 500 gr and 1 kg standard letters. As a result the tariff is equal for both types of product (14.60 EUR).

⁷ The European Regulators Group for Postal Services is a body that advises the European Commission.

⁸ On a total of 450 tariffs (30 countries x 15 product categories).

⁹ These are all the EEA countries except for the neighbouring countries (NL, DE, FR, UK and LU).

¹⁰ Namely 'earnings before interests and taxes' (EBIT) over turnover.

Apart from that, the pricing strategies are not the same for all postal operators. Some operators may merely focus on the weight of the postal items, whereas other operators may only focus on the dimensions. Yet other operators set their prices based on both weight and dimensions.

Finally, the products that are compared may show differences between one another. A product of one postal operator may automatically include an insurance against theft or damage, whereas this is not the case for another operator, for instance.

6.1 Benchmark of comparable single-piece tariffs

Figure 1 shows 4 possible benchmarks that can be applied in the context of this assessment.¹¹ First of all, the selected bpost tariffs are compared with similar products of the DUSPs of the other EU28 countries for items sent to Belgium (benchmark 1 in the figure below). In order to have a maximum basis for comparison this benchmark uses tariffs that have been adjusted according to purchasing power parity.¹²

Subsequently, the selected bpost tariffs are compared with the tariffs of Belgian commercial competitors (benchmark 2). This comparison is made on the basis of nominal tariffs.

Next, the selected bpost tariffs are compared with the sum of 1) the domestic tariff applied by bpost, 2) the domestic tariff charged by the foreign DUSP and 3) the international costs of transportation between those two countries (benchmark 3). This comparison is also made on the basis of nominal tariffs.

No comparison is made between the selected bpost tariffs and the tariffs of commercial postal operators in the destination country (benchmark 4) because benchmark 2, which includes 9 domestic commercial operators, offers a better basis for comparison and already provides sufficient insight.

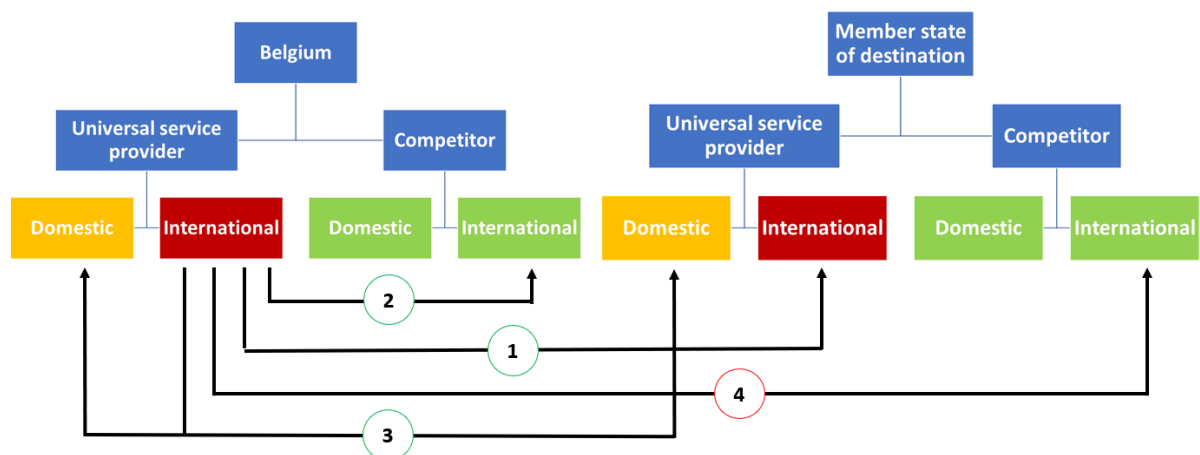


Figure 1: Benchmarks applied for the selected bpost tariffs (1, 2 and 3)

¹¹ The various possible benchmarks are presented in the Communication from the European Commission on guidelines to national regulatory authorities on the transparency and assessment of cross-border parcel tariffs pursuant to Regulation (EU) 2018/644 and Commission Implementing Regulation (EU) 2018/1263

¹² http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=prc_ppp_ind&lang=en

6.1.1 Comparison with the designated universal service provider in the destination country

The figure below shows per destination country the ratio between the tariffs from and to Belgium for 0.5 kg standard letters. The comparison is based on tariffs that have been adjusted according to purchasing power parity, thus neutralising differences in purchasing power.

A ratio higher than 1 means that for a certain destination bpost's outgoing tariff is more expensive than the tariffs to Belgium applied by the DUSP in the country of that destination. In case of a ratio of 1 (green line) bpost charges the same tariff. For those countries where the ratio lies below the green line bpost is cheaper.

Figure 2 shows that all 0.5 kg standard letters originating in the other EU28 countries and destined for Belgium are cheaper than bpost's outgoing tariffs to those EU28 countries. For 14 out of 26 member states¹³ the prices applied by bpost are even more than twice as high as the tariff the DUSPs in those member countries charge for items to Belgium. Peaks are items sent to Luxembourg and Poland, for which the bpost tariffs are respectively 6 and 7 times higher than the comparable products from those countries to Belgium.

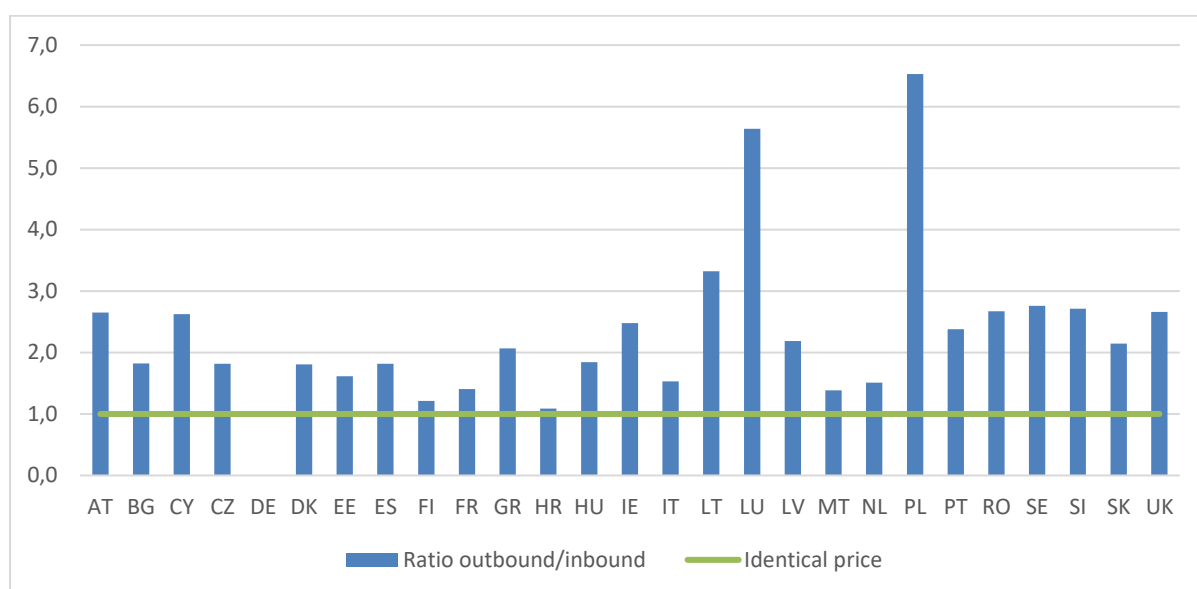


Figure 2: Ratio outgoing tariff vs incoming tariff per member state for 0.5 kg standard letters

The figure below shows the ratios for the 1 kg standard letters. In this category 18 out of 25 tariffs¹⁴ of foreign DUSPs are cheaper than the tariffs charged by bpost to those countries. Peaks are items sent to Austria, Luxembourg and Sweden, for which the bpost tariffs are about 3 times as high as the comparable products from those countries to Belgium.

¹³ For this product category the 2019 tariffs of the German DUSP, Deutsche Post, have not been included in the European Commission's list of tariffs.

¹⁴ For this product category the 2019 tariffs of the German DUSP, Deutsche Post, have not been included in the European Commission's list of tariffs. The tariffs of the British DUSP, Royal Mail, are inapplicable.

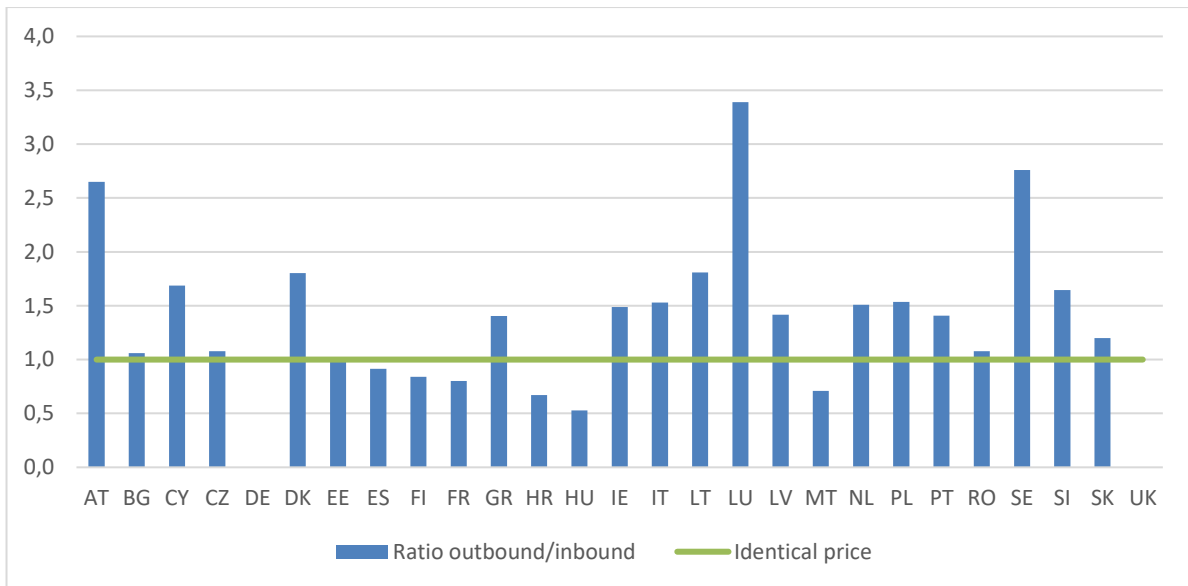


Figure 3: Ratio outgoing tariff vs incoming tariff per member state for 1 kg standard letters

Figure 4 shows the ratios for the 2 kg standard letters. In this category 22 out of 25 tariffs¹⁵ of foreign DUSPs are cheaper than the tariffs charged by bpost to those countries. For 8 out of 25 member states the prices applied by bpost are more than twice as high as the tariff the DUSPs in those member countries charge for items to Belgium. Peaks are items sent to Austria, Denmark, Luxembourg, the Netherlands and Poland, for which the bpost tariffs are respectively about 5, 4, 7, 3 and 6 times as high as the comparable products from those countries to Belgium.

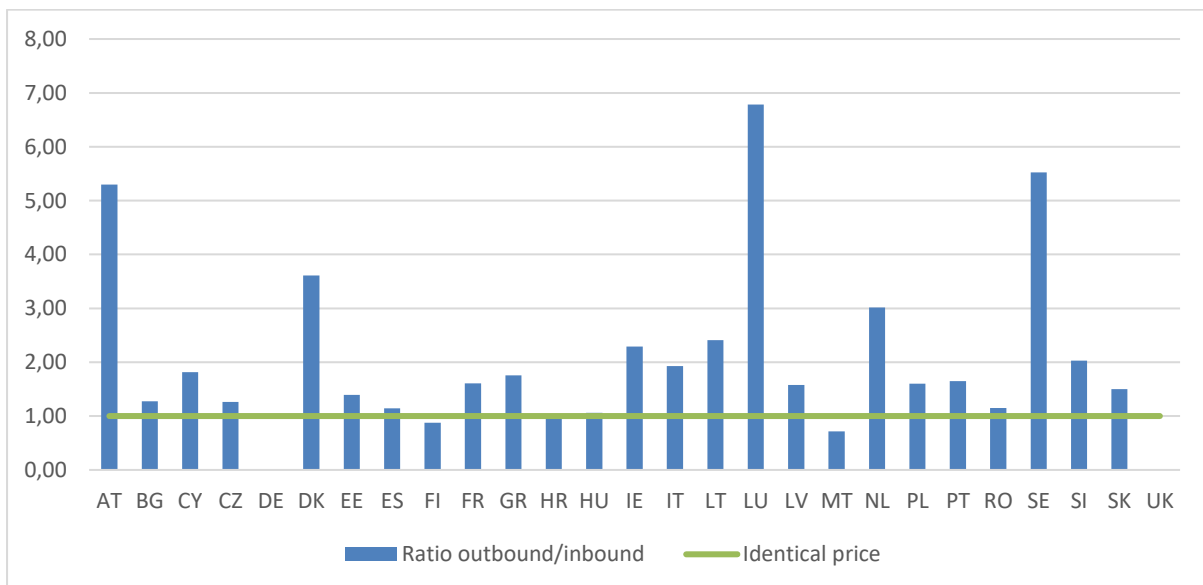


Figure 4: Ratio outgoing tariff vs incoming tariff per member state for 2 kg standard letters

The ratios for 0.5 kg registered letters are shown in figure 5. In this category 22 out of 25¹⁶ tariffs of foreign DUSPs are cheaper than the tariffs charged by bpost to those countries. The peak here is the ratio for Luxembourg, for which the bpost tariff is more than 3 times as high as for the comparable product from Luxembourg to Belgium.

¹⁵ For this product category the 2019 tariffs of the German DUSP, Deutsche Post, have not been included in the European Commission's list of tariffs. The tariffs of the British DUSP, Royal Mail, are inapplicable.

¹⁶ For this product category the 2019 tariffs of the German DUSP, Deutsche Post, have not been included in the European Commission's list of tariffs. The tariffs of the French DUSP, La Poste, are inapplicable.

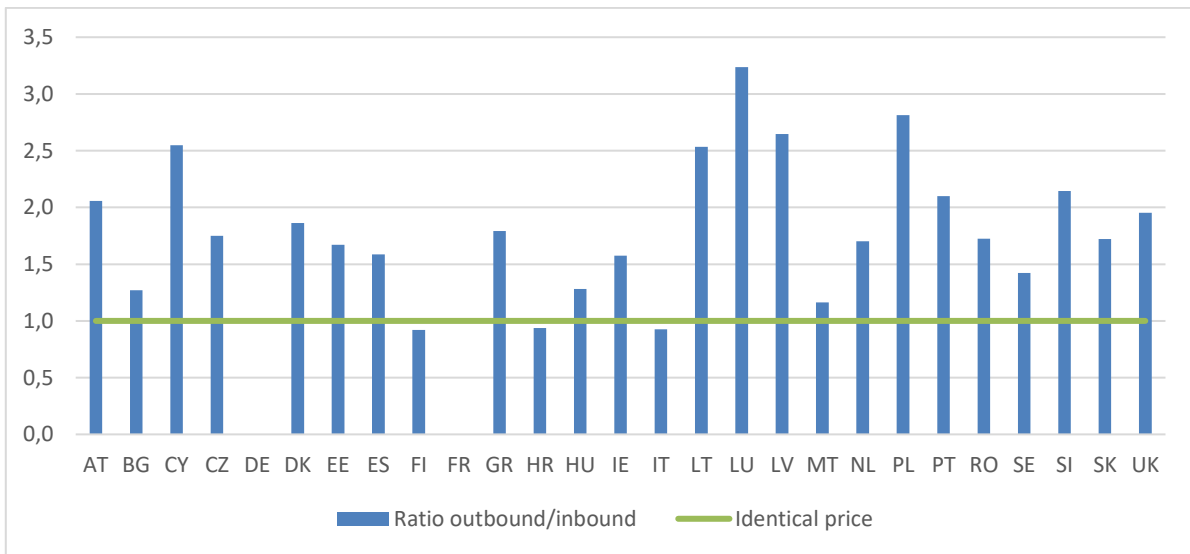


Figure 5: Ratio outgoing tariff vs incoming tariff per member state for 0.5 kg registered letters

The figure below shows the ratios for the 2 kg registered letters. In this category 19 out of 24 tariffs¹⁷ of foreign DUSPs are cheaper than the tariffs charged by bpost to those countries. Peaks are items sent to Austria, Denmark, Luxembourg and the Netherlands, for which the bpost tariffs are respectively about 3 to 4 times as high as the comparable products from those countries to Belgium.

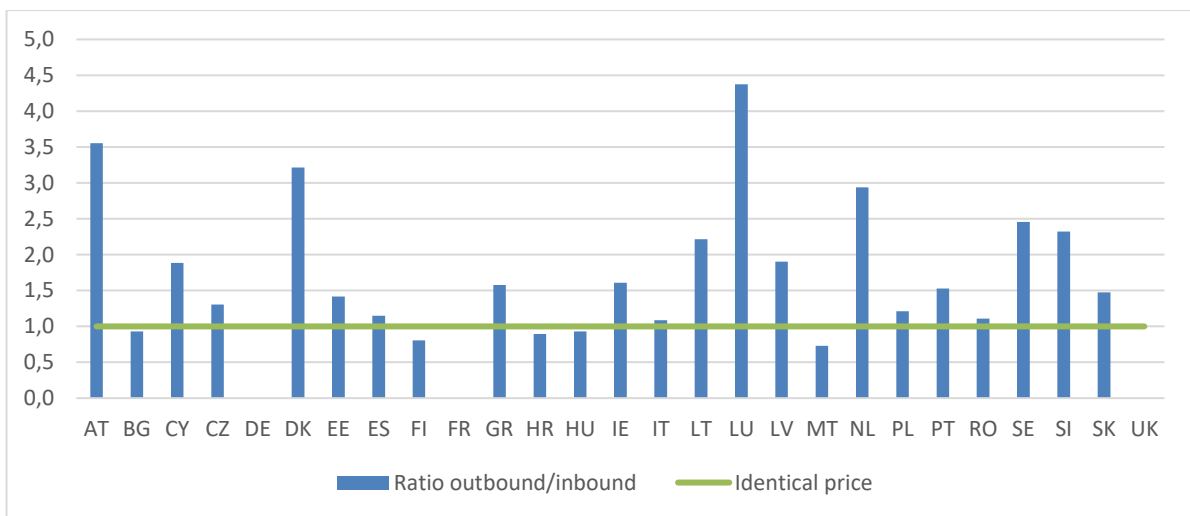


Figure 6: Ratio outgoing tariff vs incoming tariff per member state for 2 kg registered letters

Finally, figure 7 presents the ratios for the 1 kg track and trace parcels. In this category 15 out of 20 tariffs¹⁸ of foreign DUSPs are cheaper than the tariffs charged by bpost to those countries. The peak here is the ratio for Austria, for which the bpost tariff is more than twice as high as for the comparable product from Austria to Belgium.

¹⁷ For this product category the 2019 tariffs of the German DUSP, Deutsche Post, have not been included in the European Commission's list of tariffs. The tariffs of the British DUSP, Royal Mail, and of the French DUSP, La Poste, are inapplicable.

¹⁸ The available tariffs of the 1 kg track and trace parcels to the neighbouring countries (DE, FR, LU, NL and UK) are merely illustrative as they have not been selected by the European Commission for the assessment. The tariffs of the Bulgarian DUSP, Bulgaria Post, are inapplicable. The product offered by the Italian DUSP, Poste Italiane, is not part of the USO.

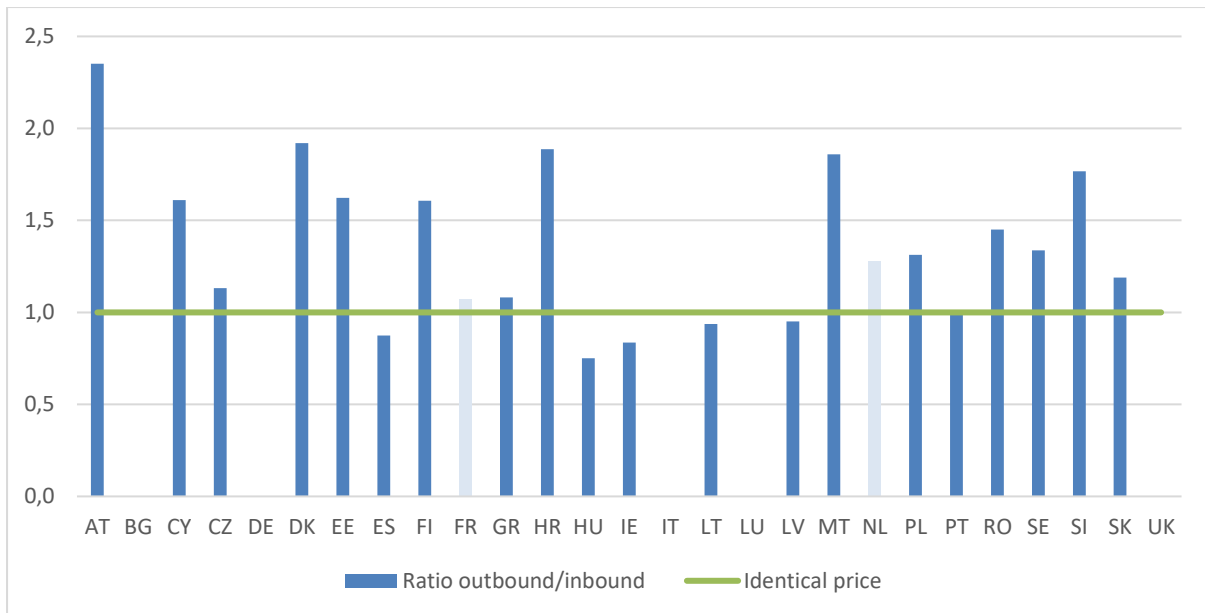


Figure 7: Ratio outgoing tariff vs incoming tariff per member state for 1 kg track and trace parcels

6.1.2 Comparison with commercial operators in the originating country (Belgium)

Contrary to the previous benchmarking against the DUSPs in the destination countries, where tariffs adjusted according to purchasing power parity were used, this benchmark uses nominal tariffs seeing that for outgoing items from Belgium, the comparison is made only with postal operators established in Belgium. Therefore this is a comparison on one and the same domestic market under identical macroeconomic circumstances.

Among the Belgian postal operators, apart from bpost, only TBC-Post offers single-piece items for standard letters. The bpost tariffs turn out to be 8.15% more expensive than the TBC-Post tariffs for all weight categories (0.5 kg, 1 kg and 2 kg) and for all EU28 destinations combined.

The nominal tariffs of both providers are given in the graph below. The products of bpost and TBC-Post are similar in minimum and maximum sizes, and weight. Delivery of the items in the destination countries is always carried out according to the rules of the postal operator in the destination country.

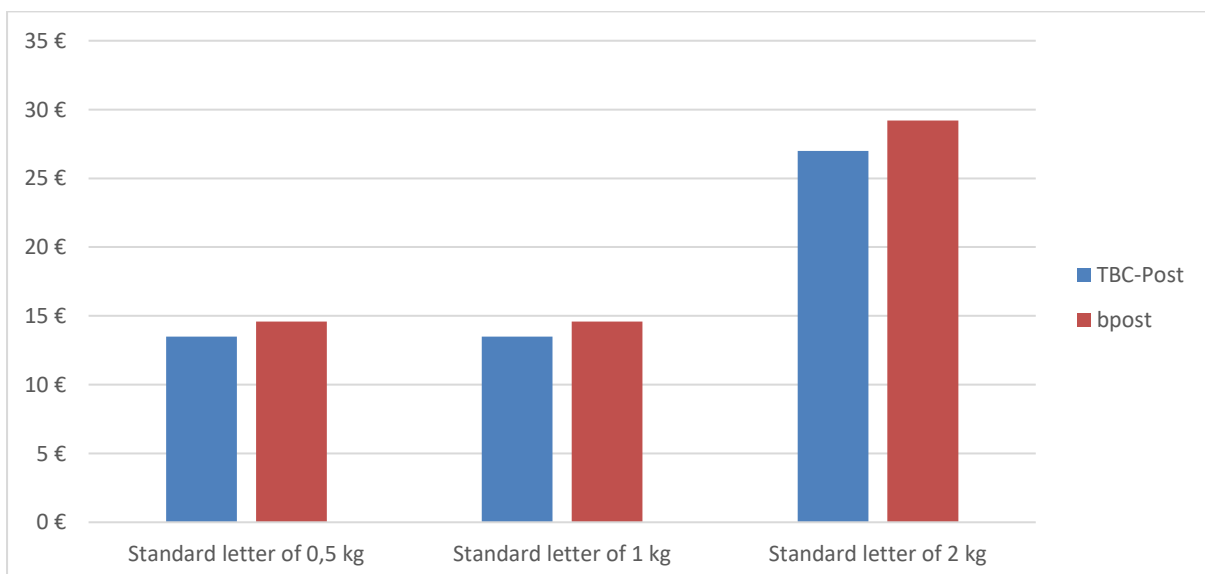


Figure 8: Nominal tariffs of TBC-Post and bpost applicable to standard letters to all destinations in the EU.

As for intra Union registered items competition is also limited to bpost and TBC-Post. The bpost tariffs are respectively 7.3% and 6.7% more expensive than those of TBC-Post for the weight categories 0.5 kg and 2 kg for all destinations combined. The nominal tariffs of both providers are given in the graph below. In this case too, the products are sufficiently comparable.

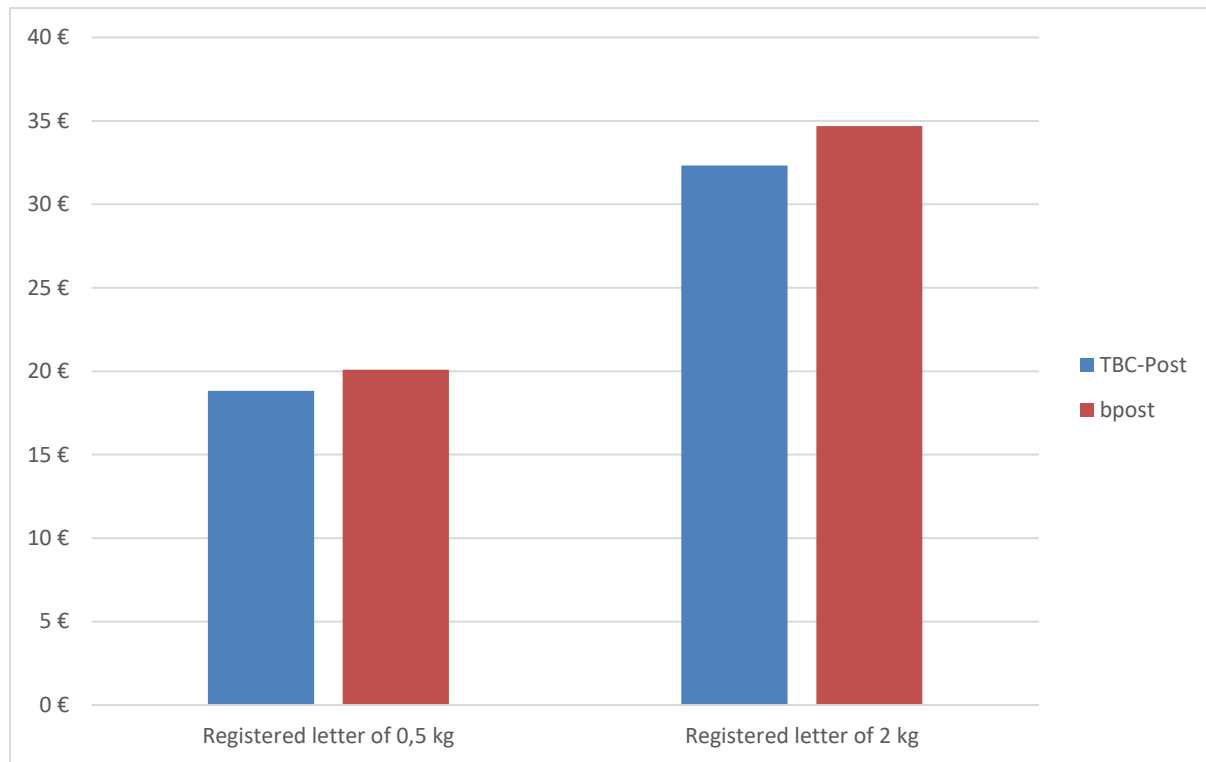


Figure 9: Nominal tariffs of TBC-Post and bpost applicable to registered letters to all destinations in the EU.

In Belgium, 1 kg track and trace parcels are offered by 9 commercial operators, besides bpost.¹⁹ As far as this type of product is concerned much heterogeneity is observed regarding the minimum and maximum dimensions of the parcel. The comparison should be nuanced in that sense. We also notice that commercial competitors mostly apply varying prices according to the destination, whereas bpost only makes a distinction between tariffs for neighbouring countries on the one hand and other EU countries on the other.

The bpost tariffs are below the median for all selected destinations, with the exception of items to Austria (slightly above the median) and Denmark (on the median). Therefore, compared to the commercial operators bpost is competitive. Annex 6 includes a table in which the ratio of the bpost tariffs to the tariffs of local commercial competitors is detailed.

Although bpost items sent to the neighbouring countries are not part of the selected tariffs after applying the filter mechanism, it is useful to include them in this analysis as a framework for the selected bpost tariffs. For bpost they represent more than [65-75]% of the intra Union volume. For the sake of completeness it is pointed out that for items to France, Germany and the United Kingdom bpost is positioned just below the median. By contrast, bpost is situated just above the median for items to the Netherlands and Luxembourg.

¹⁹ Those are governed by Article 4 of the Regulation.

6.1.3 Comparison with the sum of foreign tariffs and international transportation costs

A third benchmark is the comparison between the cross-border tariff charged by bpost and the sum of the domestic tariffs (of bpost in Belgium + of the DUSP in the destination country) plus the international transportation costs (between Belgium and the destination country).²⁰ Similarly to the previous benchmark this benchmark uses nominal tariffs (and costs).

In the figure below for each destination country the ratio is thus given between the international bpost tariff for 0.5 kg standard letters and the sum of the domestic tariffs, to which the international transportation costs are added. A ratio higher than 1 means that for a certain destination the bpost outgoing tariff is more higher than the sum of both domestic tariffs plus the international transportation costs. In case of a ratio of 1 (green line) bpost's outgoing tariff is exactly the same as the sum of the domestic tariffs plus the international transportation costs. For those countries for which the ratio is below the green line, the international tariff of bpost does not cover the sum of the domestic tariffs (plus the international transportation costs).

Figure 10 shows that only for Finland the bpost tariff for outgoing 0.5 kg standard letters only just fails to cover the sum of the domestic tariffs increased by the international transportation costs. For 23 out of 24 available countries²¹ that sum is covered, though. For 11 of the 24 countries the outgoing bpost tariff is even more than twice as high.

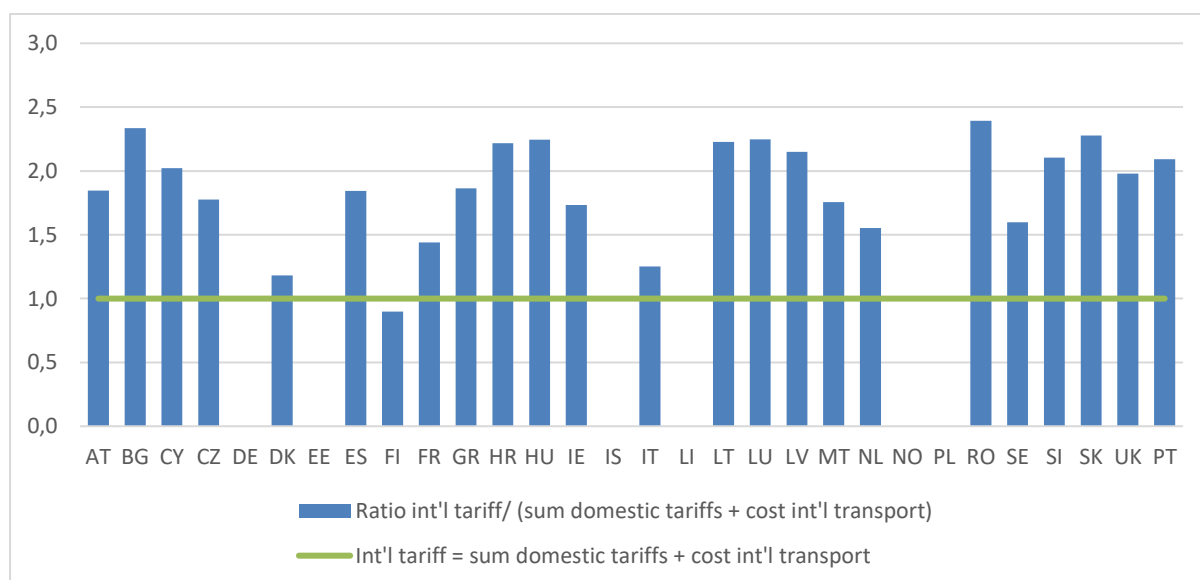


Figure 10: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 0.5 kg standard letters

²⁰ In order to interpret the following results correctly it is important to keep in mind that costs of collection and delivery are expected to be counted twice (once in Belgium by way of the bpost tariff and once in the destination country by way of the tariff charged by the local DUSP). By way of precaution a small upward bias of the costs in the sum of the domestic tariffs can therefore be expected.

²¹ For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

The figure below shows that the bpost tariff for outgoing 1 kg standard letters to Finland does not cover the sum of the domestic tariffs plus the international transportation costs. For Ireland it does, but only very just. For the remaining 21 of 23 countries²² that sum is covered, though. For 2 of the 23 countries (Bulgaria and Romania) the outgoing bpost tariff is more than twice as high.

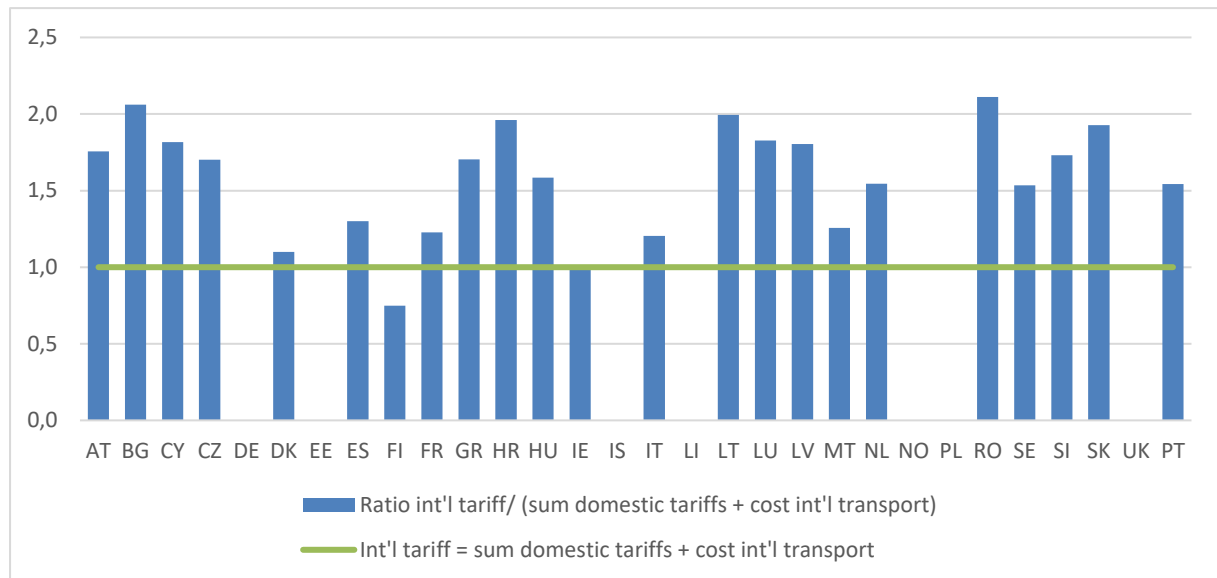


Figure 11: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 1 kg standard letters

Figure 12 shows to what extent the bpost tariff for outgoing 2 kg standard letters for all 23 available countries covers the sum of the domestic tariffs increased by the international transportation costs. For the remaining 21 of 23 countries²³ that sum is covered, though. For 17 of the 23 countries the outgoing bpost tariff is more than twice as high.

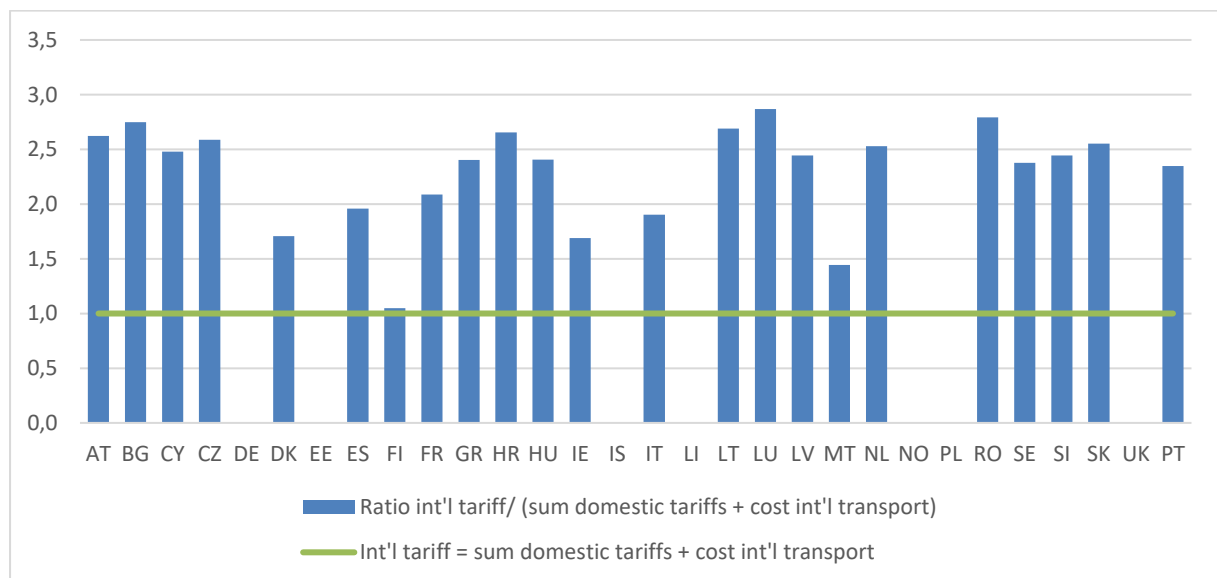


Figure 12: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 2 kg standard letters

²² For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

²³ For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

The figure below shows that the bpost tariff for outgoing 0.5 kg registered letters to Denmark, Italy and Sweden only just fails to cover the sum of domestic tariffs increased by the international transportation costs. For 19 out of 22 available countries²⁴ that sum is covered, though.

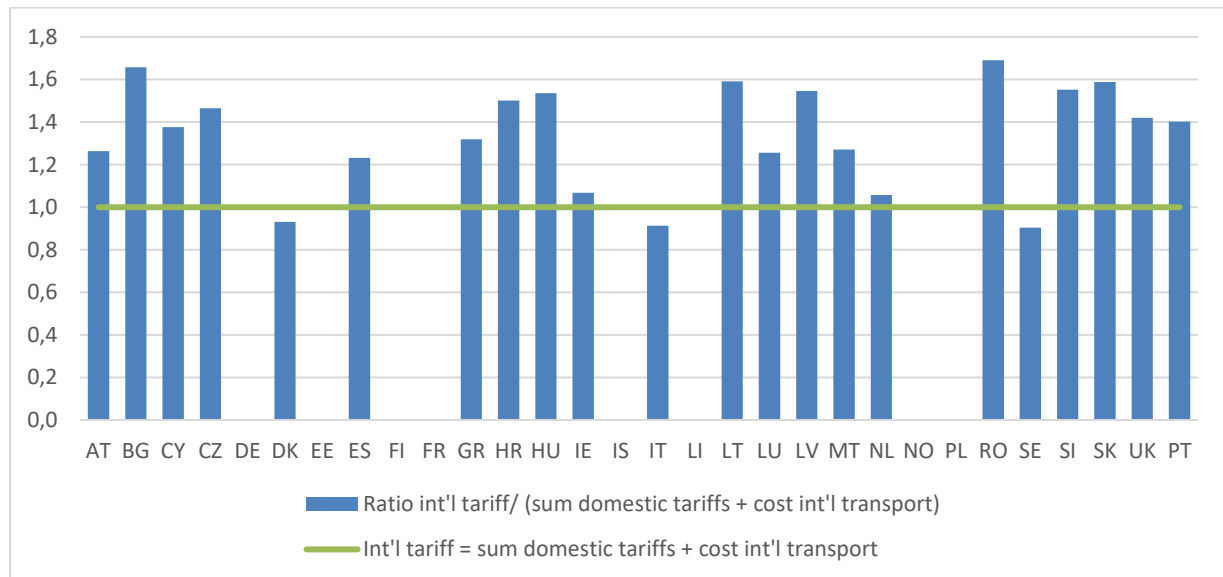


Figure 13: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 0.5 kg registered letters

Figure 14 shows to what extent the bpost tariff for outgoing 2 kg registered letters for all 21 available countries²⁵ covers the sum of domestic tariffs plus the international transportation costs. For 4 of the 21 countries the outgoing bpost tariff is more than twice as high.

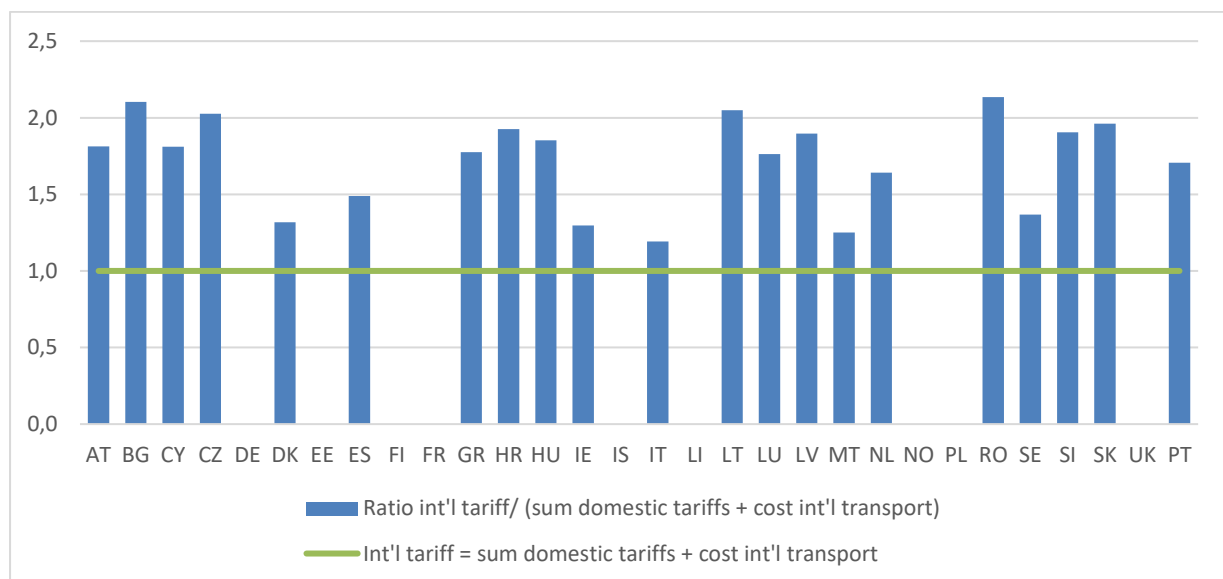


Figure 14: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 2 kg registered letters

²⁴ For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

²⁵ For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

Finally, figure 15 shows how the bpost tariff for outgoing 1 kg track and trace parcels for all 20 available countries²⁶ covers the sum of domestic tariffs increased by the international transportation costs. For 9 of the 20 countries the outgoing bpost tariff is more than three times as high.

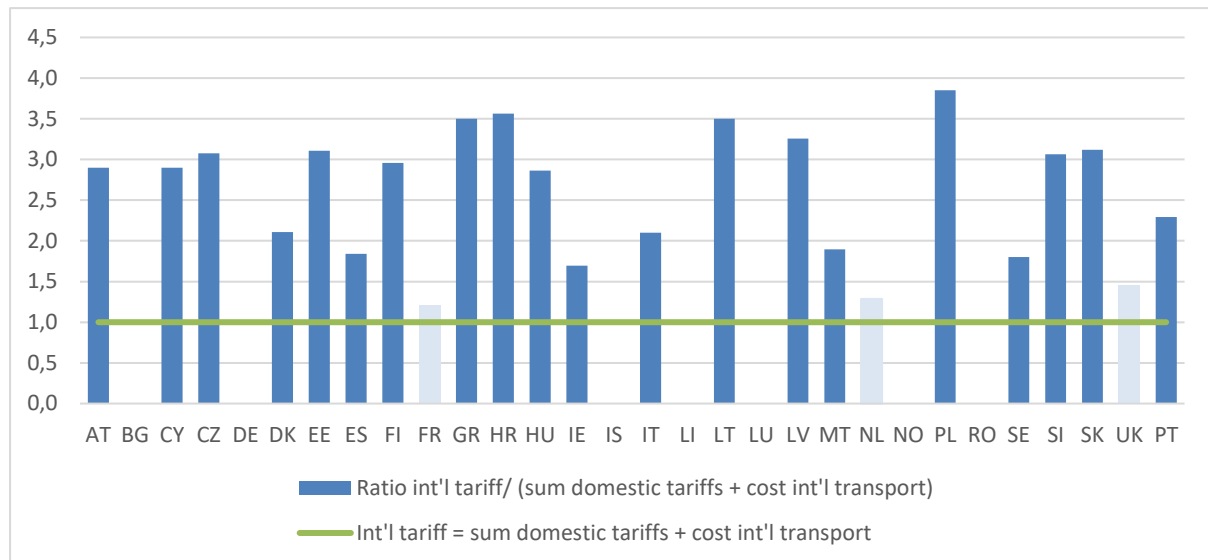


Figure 15: Ratio outgoing tariff vs domestic tariffs + international transportation costs for 1 kg track and trace parcels

When we look at the average of the ratios above for each of the products for all destinations combined, we see that the ratio for the 0.5 kg registered items is closest to the green line. Here, on average, the outgoing bpost tariff is 30% higher than the sum of domestic tariffs, increased by the international transportation costs. Furthermore, for 2 kg standard letters and 1 kg track and trace parcels the outgoing bpost tariffs turn out to be, on average, respectively 130% and 180% higher than the sum of domestic tariffs plus the international transportation costs.



Figure 16: Average ratios for each of the products

²⁶ The available tariffs of the 1 kg track and trace parcels to the neighbouring countries (DE, FR, LU, NL and UK) are merely illustrative as they have not been selected by the European Commission for the assessment. For this product category the 2019 tariffs of the German universal service provider, Deutsche Post, have not been included in the European Commission's list of tariffs. For the other missing countries a comparison is impossible for lack of comparable products within the universal postal service.

6.2 Analysis of bilateral volumes

6.2.1 Analysis of letter post

The figure below shows per destination country the ratio between volumes from and to Belgium for letter post²⁷. A ratio higher than 1 means that for a certain destination the outgoing volume of bpost is higher than the volume to Belgium. For countries where the ratio is situated below the green line the incoming volume is bigger than the outgoing volume. This analysis is important because bigger volumes, owing to the existence of economies of scale, can lead to lower unit costs, mainly for transportation costs.

For letter post bpost usually has higher outgoing than incoming volumes, with peaks for Cyprus ([5-15]) and Slovakia ([5-15]). Only for Germany ([CONFIDENTIAL]), Estonia ([CONFIDENTIAL]), France ([CONFIDENTIAL]), Luxembourg ([CONFIDENTIAL]) and the Netherlands ([CONFIDENTIAL]) is the ratio lower than 1. However, the large share of the neighbouring countries in the total volume results in the fact that the global ratio for all EU28 countries combined is lower than 1 ([CONFIDENTIAL]). The potential negative effect of a higher volume of incoming than outgoing items is discussed in 6.3.2.

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Figure 17: Ratio of outgoing volume vs incoming volume per member state for letter post
Note: there are no data for LI (Liechtenstein)

It could be expected that there would be a rather strong correlation as regards outgoing/incoming letters between the ratios concerning tariffs (see 6.1.1.) and volumes (see above). In that case a difference in tariff could at least partially result from a difference in volume.

However, for letter post the correlation shows a weak connection (coefficient of -0.28) for 2 kg standard letters to a practically inexistent connection (coefficient of 0.04) for 0.5 kg registered letters. Therefore, differences in volume seem to explain only to a limited extent the differences observed in tariffs for outgoing vs incoming letter post.

6.2.2 Analysis of parcel post

Figure 18 shows a similar image for parcels.²⁸ In most cases the ratio is largely above 1, meaning that for bpost outgoing items exceed incoming items for the majority of member states. Only for Austria ([CONFIDENTIAL]), Germany ([CONFIDENTIAL]), France ([CONFIDENTIAL]) is the ratio lower than 1. For the neighbouring countries however, the volumes are high, so that the overall ratio, across all member states, remains largely below 1 (i.e. [CONFIDENTIAL]). For all EU28 countries combined bpost therefore receives more parcels that it sends.

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Figure 18: Ratio of outgoing volume vs incoming volume per member state for parcel post
Note: there are no data for LI (Liechtenstein)

Nevertheless, exactly as in the case of letter post, differences in volume seem to explain only to a limited extent the differences observed in tariffs for outgoing vs incoming parcel post. Again, we observe only a weak connection (coefficient of -0.25) between the ratios for the tariffs (see 6.1.1.) and the volume of 1 kg track and trace parcels (see above).

²⁷ The total is discussed as bpost is unable to make a distinction between weight categories in the international volume.

²⁸ The total is discussed as bpost is unable to make a distinction between weight categories in the international volume.

6.3 Cost analysis

6.3.1 Analysis of the selected products

The detailed data received²⁹ concerning the cost structure and the tariffs applicable on 1 January 2019 enable the BIPT to map the cost structure per type (see figure 19 below). For the standard letters (of 0.5, 1 and 2 kg) we see that the terminal rates³⁰, amounting to [45-55]% of the costs, constitute the biggest cost item, whereas the international transport accounts for about [20-30]% of the costs. The proportion of the retail and sorting costs varies around [5-15]%.

In case of registered letters (of 0.5 and 2 kg) the retail costs, amounting to [35-45]%, constitute a bigger part of the total costs compared to standard letters. The terminal rates follow with [30-40]%. International transportation costs and sorting costs each account for about [5-15]%.

As for the track and trace parcels (of 1 kg) we see that the terminal rates constitute the major part of the total costs with [30-40]%. They are followed by the retail costs ([25-35]%), sorting costs ([10-20]%) and international transportation costs ([0-10]%).

Here we point out that single-piece postal items and bulk postal items are considered as a whole to determine the unit costs for the three types of product. If the unit costs were calculated only on the basis of the single-piece postal items, they would be higher, thus reducing the RoS margin (see analysis below).

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Figure 19: The average cost construction per type of product

In the following lines the RoS is detailed. The table below includes the median costs, the tariffs and the median RoS margin per selected product. This margin is calculated by comparing the difference between the applicable tariff and the median cost to the applicable tariff. As a result it becomes clear how much profit³¹ per unit is made compared to turnover.³²

²⁹ For a list of these detailed data, see annex 1 for the selected products and annex 2 for the products that have not been selected (i.e. the products for the neighbouring countries NL, FR, DE, LU and UK) but which are part of the '1 kg track and trace parcel' category.

³⁰ Payments made (or received) by postal operators for processing and delivery of international items.

³¹ Before deduction of interest and taxes.

³² A 5% RoS means for instance that for each euro of turnover a 5 eurocent profit is made.

At first sight it can be observed that there is a rather large difference between the median costs and the tariffs. This translates into a median RoS, which for the selected tariffs, varies from [45-55]% to [70-80]%. Only for a 1 kg track and trace parcel to neighbouring countries do we find a more modest RoS margin (i.e. [5-15]%). However, the latter category of products (to the neighbouring countries) does not belong to the products selected by the European Commission's filter mechanism. This finding illustrates and points out the effectiveness of the filter mechanism applied by the European Commission.

	Median cost	Tariff	RoS median
0.5 kg standard letter	€ [0-10]	€ 14.6	[70-80] %
1 kg standard letter	€ [0-10]	€ 14.6	[65-75] %
2 kg standard letter	€ [0-10]	€ 29.2	[70-80] %
0.5 kg registered letter	€ [5-15]	€ 20.1	[45-55] %
2 kg registered letter	€ [10-20]	€ 34.7	[55-65] %
1 kg track and trace parcel	€ [10-20]	€ 32.8	[45-55] %
1 kg track and trace parcel neighbouring countries ³³	€ [10-20]	€ 16.4	[5-15] %

Table 1: Tariffs and average costs and RoS for the selected and additional products

The figures below graphically represent the median cost and the tariff on the one hand and the RoS per type of product on the other.

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Figure 20: Average cost and tariff per type of product for the selected and additional products

[CONFIDENTIAL]

Figure 21: Median RoS per type of product for the selected and additional products

6.3.2 Analysis of application of a uniform tariff and net revenue effect

For the 1 kg track and trace parcels to the neighbouring countries we see that because the tariffs for those products are lower, the median costs are significantly closer to those tariffs. As can be seen in the table and graphs above, this results in a median RoS of [5-15]%. When combining all 1 kg track and trace parcels (so both those to the neighbouring countries and those to the rest of the EU28 countries) we notice that the RoS ratio slightly drops from [45-55]% to [45-55]% for this category. This is an indication that bpost's zonal pricing strategy (neighbouring countries vs rest of EU28) has a (limited) impact on the tariffs selected for assessment and that the analysis of non-selected tariffs can be used as a reference to situate the selected tariffs.

³³ These products have not been selected for assessment but do belong to the '1 kg track and trace parcel' category (for neighbouring countries NL, FR, DE, LU and UK).

An extra analysis that is then essential and which may give more insight is the consideration of the RoS margin for all the bpost products combined which fall under the Regulation.³⁴ Because of differences between bpost and the EC in the manner of categorising the postal products (regarding both destination in the context of zonal pricing and weight) it has turned out to be impossible, according to bpost, for bpost to provide adequate data.³⁵

At first sight, this analysis could be developed further when incoming items are also taken into consideration. The fact of the matter is that bpost gets a compensation for the incoming items, the so-called 'terminal rates' for the further processing and final delivery.³⁶ As indicated in figure 22 those compensations are usually low. For 0.5 kg, 1 kg standard letters and 1 kg track and trace parcels the terminal rates received are even mostly below cost.³⁷

However, aggregating the RoS margins of outgoing postal items with the (possibly negative) margin of the incoming postal item for which the terminal rate does (or may) not cover the costs of sorting, transport, delivery and other costs borne by bpost, falls outside the scope of this assessment.³⁸ Besides, this would create a distortion and complicate comparability between product categories, the terminal rates covering the costs for one product category but not for another.

It could be useful though to verify in future analyses if and to what degree pricing mechanisms for terminal rates for both outgoing and incoming postal items between destination country and country of origin have an impact on the international rates in the country of origin.

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Figure 22: Median of the difference per unit (in EUR) of the received terminal rates and the cost of sorting, transport, delivery and other costs

³⁴ So, not only the tariffs selected for assessment, but also all the tariffs reported by bpost within the framework of Article 5 of the Regulation. Ideally we take the RoS of the entire scope of the Regulation into consideration.

³⁵ However, bpost did manage in its answer of 2 August to report the total of the overall international revenue and costs across all countries and products - so also beyond the product categories assumed and beyond Europe, including Oceania, Asia, Africa, North and South America. For the outgoing items this produced an RoS margin of [5-15]%. Yet, the overall RoS of [5-15]% cannot be used as a reference to situate the RoS margins ranging from [45-55]% to [70-80]% (which have been observed for the selected bpost products in Europe).

³⁶ Those terminal rates are determined based on international agreements, in this case the UPU, or on bilateral agreements, in this case IRA-E.

³⁷ For a 0.5 kg standard letter for instance, the median difference per unit between the terminal rates received and the sum of the costs of sorting, transport, delivery and other costs borne by bpost is -[0-10] euro (so in itself it is loss-making for bpost).

³⁸ In its answer of 2 August bpost indicated that the total worldwide margin, across all international countries and products, including outgoing and incoming items, amounted to [0-10]%. Therefore, a discrepancy seems to exist between the margins within and outside Europe on the one hand, and between incoming and outgoing items on the other. Whereby incoming items originating outside Europe mainly weigh on the total margin.

Based on the information provided by bpost we can therefore only conclude that, when combining all outgoing flows, a worldwide international RoS margin of [5-15]% can be observed. So, this applies to all international outgoing items for all the continents. Worldwide, bpost therefore operates with a limited margin. However, according to bpost, it is impossible to offer more specific information that could explain the high margins on the selected (outgoing) items (see 6.3.1.) observed at the European level.³⁹ As laid down in Article 6.5 of the Regulation, the national regulatory authority can, when it considers that it is necessary, request any evidence in relation to those tariffs that is needed for the assessment to be made.

6.3.3 Cost orientation in the tariffs

Article 6 of the Regulation describes how the national regulatory authority should assess the selected tariffs objectively and in accordance with the principles in Article 12 of Directive 97/67/EC. Both Article 12 of the Directive and the Belgian Postal Act lay down that universal service tariffs should be affordable, cost-oriented, uniform, transparent and non-discriminatory. Within the context of unreasonably high tariffs, especially the cost-oriented nature plays an important part. However, an exact definition of what a cost-oriented level is, is given nowhere.⁴⁰

For its 2017 single-piece price decision⁴¹, the BIPT particularly took a benchmark of margins of postal operators as a basis (for more information see annex 3). The purpose was to be able to determine a maximum reasonable profit margin, a margin above which prices clearly could not be considered to be cost oriented anymore. The final result was that the percentage of reasonable profit to be taken into account when verifying the cost orientation of products falling under the universal service, should not exceed 15%. Considering this, although the “reasonable margin” was taken into consideration in the context of the notion of “cost orientation”, the margins of the selected bpost tariffs (see figure 20) seem very high. However, in order to have a correct idea about the issue of those high margins in the context of the notion of “unreasonably high tariffs” the BIPT wanted to know the margin on the totality of bpost’s outgoing items across all products falling within the scope of the Regulation. Bpost has failed to provide those data. The BIPT will continue to search a way together with bpost to determine that margin after all.

³⁹ Based on bpost’s 2018 analytical accounting though, the BIPT can estimate the margin on all outgoing items within Europe. First of all, based on the analytical accounting for all outgoing items (‘OUT’ category) globally, an RoS margin of [5-15]% is observed. However, when ‘Rest of World’ (RoW) and China are left out of consideration, in order to discern outgoing items within Europe as well as possible, the margin is [15-25]%. For the universal products within this European scope the margin is [20-30]%. Yet, in case of RoW and China the overall margin is negative (-[5-15]%), even though in this case too, the (small) volume of universal products shows a clearly positive margin ([25-35]%). This analysis corresponds with the assumption made in the other analyses, i.e. that within Europe, outgoing items are marked by a considerably positive margin, contrary to outgoing items outside Europe.

⁴⁰ As confirmed by the Market Court regarding the refusal of the price increase for the small user basket in 2017, because of non-conformity with the cost orientation principle, it is up to the BIPT to give the exact interpretation of the cost orientation principle, if the European and Belgian legislators have failed to do so. Judgement of the Market Court of 11 October 2017 dismissing the action for annulment brought by bpost against the Decision of the BIPT Council of 21 March 2017 regarding the analysis of bpost’s tariff proposal for full rates per piece for the year 2017 (discussion fourth ground): <https://www.bipt.be/en/operators/bipt/disputes/year-2017/judgement-by-the-market-court-of-11-october-2017-dismissing-the-action-for-annulment-brought-by-bpost-against-the-decision-of-the-bipt-council-of-21-march-2017-regarding-the-analysis-of-bpost-s-tariff-proposal-for-full-rates-per-piece-for-the-year-2017>

⁴¹ <https://www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/bipt-council-decision-of-21-march-2017-regarding-the-analysis-of-bpost-s-tariff-proposal-for-full-rates-per-piece-for-the-year-2017>

In its reaction of 12 September 2019, bpost argues that the cost orientation principle is not included in Article 6, §§ 2 and 3 of the Regulation. Bpost also states that the notions of cost orientation in the Directive and in the Regulation are no equivalents and that they do not have the same purpose. However, both Article 6 of the Regulation and section IV of the Guidelines refer explicitly to Article 12 of the Directive:

Respectively:

“The national regulatory authority shall objectively assess, in accordance with the principles in Article 12 of Directive 97/67/EC, the cross-border tariffs identified under paragraph 1 in order to identify those cross-border tariffs that it considers to be unreasonably high.”
(Underscore added by the BIPT)

And:

“Furthermore, the assessment should also consider that different principles are used to set the tariffs. The tariffs for universal postal services are drawn up under the obligation to uphold the principles contained in Article 12 of the Postal Services Directive. This means that these tariffs must be cost-oriented, affordable, transparent and non-discriminatory.”
(Underscore added by the BIPT)

Bpost also mentions that the margin should be considered for the products as a whole. That comment was repeated in the letter of 25 October, saying that the limit does not apply at the individual product level or weight category. In regard to that comment the BIPT again refers to the 2017 pricing decision regarding the small user basket, in which only the universal service products belonging to the small user basket were considered; in addition those products were again divided into six homogeneous subcategories and tested by the maximum reasonable margin (of 15%). That is why in this case the BIPT wanted to know the margin on the totality of bpost’s outgoing items across all products falling within the scope of the Regulation.

Finally bpost states that the RoS margin of postal companies such as UPS, having partially deviating services, does not constitute a relevant basis for comparison, like the maximum reasonable margin for services of general economic interest. However, also in the 2017 BIPT pricing decision (see annex 3) the maximum reasonable margin was determined based on various sources linked to postal products, so including the margin of UPS (from 2015) and the maximum margin for services of general economic interest. UPS constitutes a relevant basis for comparison, also for the products falling within the scope of the Regulation, definitely now that it has also been included in the group of operators who have to comply with the reporting obligations of this legal text.

6.4 Analysis of impact on vulnerable postal consumers

Finally, under Article 6, 2, d of the Regulation, the BIPT has to take account of the probable consequences of the current cross-border tariffs for private consumers and SMEs, including those in remote or sparsely populated areas, and for private users with a handicap or limited mobility. However, this should be done without imposing an unreasonable burden.

The latest quantitative consumer study of the BIPT was published in 2015.⁴² The quantitative study concludes that postal users are cost-conscious. Both residential and professional users point out for instance that lower prices are the change they most wish for as far as postal services are concerned.⁴³

In July 2019, the BIPT contracted out a *mixed method* consumer study that includes both a qualitative and quantitative part and is expected to cover the last quarter of 2019 and the first three quarters of 2020. The impact and probable consequences of the prevailing cross-border tariffs for private users and SMEs will be part of this study.

In its reaction of 12 September 2019 bpost states that the 2015 quantitative consumer study of the BIPT does not say that the users are unable to buy postal products. It is true that this issue was not studied specifically, so that the BIPT merely points out that lower prices would be the change most wished for by postal service users.

⁴² <https://www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/bipt-council-communication-of-22-december-2015-on-the-realisation-of-a-statistical-survey-and-analysis-regarding-the-preferences-the-needs-and-the-willingness-to-pay-of-domestic-private-and-professional-users-of-services-relating-to-the-universal-postal>

⁴³ Options: 1) delivery and clearance of mail 6 days per week 2) delivery of the mail at an earlier time than now 3) a much later time than now for the clearance of red letterboxes 4) delivery of postal parcels in the evening or in weekends 5) a letterbox much closer to my home 6) delivery of my mail in a post office or postal point, rather than at home 7) lower rates 8) other (please specify) 9) nothing

7 Conclusion

When comparing the selected bpost tariffs based on the three benchmarks of section 6.1 with tariffs of domestic and foreign postal operators, the following conclusions can be drawn:

- 1) Bpost is rather competitive compared with local competitors;
- 2) Bpost is nonetheless in an unfavourable position compared to foreign designated universal service providers;
- 3) The comparison between the sum of the domestic tariffs, of both bpost and the designated universal service provider in the destination country plus the international transportation costs on the one hand and the selected international bpost tariffs on the other also shows that there is a large gap between the selected international bpost tariffs and the indicative costs, which may lead to the observation that the margins are very high.

Next, factors that may explain this large gap have been examined. Differences in volume between outgoing and incoming items and associated differences in unit costs for transportation, appear to explain this gap only to a limited extent. The cost analysis next shows that the margins on the selected tariffs per product type, rising from [45-55]% to [70-80]%, seem very high at first sight.

The margin on the totality of bpost's outgoing items across all products falling within the scope of the Regulation may lead to other useful insights into the margins above per product category. Bpost has failed to provide those data. The BIPT will continue to search a way together with bpost to determine that margin after all.

Axel Desmedt
Member of the Council

Jack Hamande
Member of the Council

Luc Vanfleteren
Member of the Council

Michel Van Bellinghen
Chairman of the Council

Annexes

Annex 1: Cost analysis of the selected products

[CONFIDENTIAL]

Annex 2: Additional cost analysis of non-selected products (neighbouring countries)

[CONFIDENTIAL]

Annex 3: Background information about the benchmark of operating margins within the framework of cost orientation

For its 2017 pricing decision about single-piece tariffs⁴⁴ in order to determine a reasonable margin in case of a cost oriented price, the BIPT specifically relied on a margin benchmark of the main postal incumbents in Western Europe following a study by Charles River Associates⁴⁵. As stated below, that benchmark was completed and strengthened by adding other perspectives. The purpose was to be able to determine a maximum reasonable profit margin, a margin above which prices clearly could not be considered to be cost oriented anymore. This cost orientation testing can offer a framework to determine whether or not tariffs are reasonable.

This maximum reasonable RoS margin, or return on sales margin, was therefore specifically determined by taking the average margin of the twelve comparable Western European postal incumbents regarding the third quartile over three years. The value of the third quartile was specifically chosen as the point of departure - contrary to a central measure as the average or median - to prevent underestimation, so as to be on the safe side (type I error). In addition, bpost was also included in that benchmark, thus pushing the maximum value upward.

The final result (see Annex 4) for the third quartile amounted to an RoS margin of 14.11%. As a consequence the BIPT estimated that the percentage of reasonable profit to be taken into account when verifying the cost orientation of products falling under the universal service, should not exceed 15%. That 15% also allowed for the fact that the risk taken by bpost for providing the universal service is probably higher than the risk it runs for only delivering the press to subscribers, for which the reasonable profit allowed has been set at 7.4%. Also the level of reasonable profit determined by the European Commission in Decision SA.14588 (C20/2009) of 25 January 2012 (i.e. 5.4 to 7.4% RoS). Even UPS - a player considered to be one of the most profitable companies for CPE activities⁴⁶ -, had a margin of 'only' 13.3%. Annex 5 illustrates, based on an update for the years 2016-2018 of the benchmark of Western European incumbent postal operators mentioned above, how a current profit margin up to 15% could also today be considered to be the maximum for cost orientation.

⁴⁴ <https://www.bipt.be/en/operators/postal/universal-and-non-universal-postal-services/bipt-council-decision-of-21-march-2017-regarding-the-analysis-of-bpost-s-tariff-proposal-for-full-rates-per-piece-for-the-year-2017>

⁴⁵ "Estimating a reasonable profit margin for DPLP's provision of letter services", Charles River Associates, 1 March 2011.

⁴⁶ Courrier, parcel, express.

Annex 4: Operating margins⁴⁷ of the main incumbent postal operators in Western Europe (2013-2015)

EBIT Margins	2013	2014	2015	
bpost	24.10%	26.00%	24.10%	
Austria Post	17.80%	17.20%	18.00%	
CTT Correios	13.60%	18.90%	15.10%	
Swiss Post	10.90%	11.60%	12.70%	
Post Norway	10.70%	9.10%	6.90%	
Deutsche Post	8.40%	8.30%	6.80%	
La Poste	4.70%	3.70%	6.10%	
Royal Mail	4.00%	6.10%	5.40%	
Post NL	4.80%	6.30%	4.20%	
Posti	5.50%	2.10%	3.30%	
Correos	4.10%	18.20%	-3.00%	
Poste Italiane	3.30%	-5.80%	-6.90%	Av. (2013-2015)
Average	9.33%	10.14%	7.73%	9.06%
Median	6.95%	8.70%	6.45%	7.37%
1st quartile	4.55%	5.50%	3.98%	4.68%
3rd quartile	11.6%	17.5%	13.3%	14.11%

⁴⁷ Note that the operating margins are those achieved by the operators on their postal activities only. If the operating margin has not been reported separately by the operators, the operating margin mentioned is that achieved by the company for its overall activities.

Annex 5: Operating margins⁴⁸ of the main incumbent postal operators in Western Europe (2016-2018)

EBIT Margins	2016	2017	2018	
bpost	25.22%	21.68%	18.53%	
Austria Post	18.20%	18.70%	19.00%	
CTT Correios	13.04%	6.6%	5.4%	
Swiss Post	10.90%	13.10%	14.30%	
Post Norway	7.36%	8.45%	9.25%	
Deutsche Post	8.50%	8.30%	3.60%	
La Poste	5.11%	5.05%	4.26%	
Royal Mail	5.40%	5.10%	4.37%	
Post NL	8.50%	9.90%	7.90%	
Posti	3.00%	3.40%	2.90%	
Correos	2.76%	10.10%	8.25%	
Poste Italiane	-5.21%	-6.36%	-5.20%	Av. (2016-2018)
Average	8.57%	8.67%	7.71%	8.32%
Median	7.93%	8.38%	6.64%	7.65%
1st quartile	4.58%	5.09%	4.10%	4.59%
3rd quartile	11.4%	10.9%	10.5%	10.93%

⁴⁸ Note that the operating margins are those achieved by the operators on their postal activities only. If the operating margin has not been reported separately by the operators, the operating margin mentioned is that achieved by the company for its overall activities. For PostNL the calculation is based on operating income (mail).

Annex 6: Ratio bpost tariffs vs tariffs local competitors for 1 kg track and trace parcels

	AT	BG	HR	CY	CZ	DK	EE	FI	GR	HU	IS	IE	IT	LV	LI	LT	MT	NO	PL	PT	RO	SK	SI	ES	SE
DHL Express	0,36	0,30	0,30	0,30	0,30	0,36	0,30	0,36	0,36	0,30	0,30	0,36	0,36	0,30	0,30	0,30	0,30	0,30	0,30	0,36	0,30	0,30	0,30	0,36	0,36
DPD	2,20	1,11	1,59	NA	1,59	2,20	1,11	1,76	1,13	1,59	NA	1,13	2,20	1,11	NA	1,11	NA	NA	2,20	1,76	1,11	1,59	1,59	1,76	1,76
FedEx	0,82	0,48	0,48	0,44	0,48	0,82	0,48	0,48	0,48	0,48	0,44	0,53	0,53	0,48	0,46	0,48	0,44	0,46	0,48	0,48	0,48	0,48	0,48	0,53	0,48
GLS Belgium	3,05	1,83	2,23	NA	2,23	3,05	1,83	2,53	NA	2,23	NA	NA	3,05	1,83	NA	1,83	NA	NA	3,05	2,53	1,83	2,23	2,23	2,53	2,53
Mikropakket	0,95	NA	NA	NA	NA	0,97	NA	0,48	0,31	NA	NA	0,46	0,53	NA	NA	NA	NA	0,52	NA	0,45	NA	NA	NA	0,36	0,55
Mondial Relay	3,18	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,18	NA	NA	NA	NA	NA	NA	3,18	NA	NA	NA	3,89	NA
PostNL	1,99	1,46	1,35	1,35	1,99	1,99	1,46	1,46	1,43	1,68	1,35	1,68	1,99	1,46	1,43	1,46	1,43	1,43	1,99	1,68	1,46	1,68	1,68	1,99	1,68
TNT	0,82	0,48	0,48	0,44	0,48	0,82	0,48	0,48	0,48	0,48	0,44	0,53	0,53	0,48	0,48	0,46	0,44	0,46	0,48	0,48	0,48	0,48	0,48	0,44	0,48
UPS	1,05	0,34	0,68	NA	0,68	1,05	0,34	0,38	0,38	0,68	NA	0,44	0,44	0,34	0,29	0,34	NA	0,29	0,68	0,44	0,34	0,68	0,68	0,44	0,38
Tarief bpost	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80	32,80
Mediaan	31,95	50,30	40,40	74,50	40,40	32,80	50,30	67,80	67,80	40,40	74,50	61,70	47,25	50,30	69,75	50,30	74,50	71,70	40,40	50,30	50,30	40,40	40,40	47,25	60,13
Ratio bpost/mediaan	1,03	0,65	0,81	0,44	0,81	1,00	0,65	0,48	0,48	0,81	0,44	0,53	0,69	0,65	0,47	0,65	0,44	0,46	0,81	0,65	0,65	0,81	0,81	0,69	0,55