

**DECISION ON THE CTT'S PROPOSAL WHICH COMPLEMENTS  
THE OBJECTIVES OF POSTAL NETWORK DENSITY AND  
MINIMUM SERVICES PROVIDED ESTABLISHED IN ANACOM'S  
DECISION OF 15.09.2017**

**ANACOM**

**2019**

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## 1. Background

By determination of 10.01.2019, the Board of Directors of the National Communications Authority (ANACOM) decided to initiate a procedure for the review of the objectives of postal network density and minimum services provided, to be fulfilled by CTT – Correios de Portugal (CTT), under Base XV of the Universal Postal Service (SPU)<sup>1</sup> Concession.

In this procedure, it was concluded that a series of exceptional circumstances were found to exist that justified the review of the objectives of postal network density and minimum services provided stipulated in ANACOM's decision of 15.09.2017 (hereinafter «Objectives established on 15.09.2017»), which should be complemented with a view, namely, to ensuring (i) the quality of the customer service provided at post offices relative to postal services, as well as (ii) the necessary conditions to assure the inviolability and secrecy of postal items, the confidentiality of the conveyed or stored information and the protection of personal data and privacy, fostering the confidence of the users in the services provided, thus contributing to meet their needs in terms of use of postal services.

In this context, it was deemed necessary, in particular, to assure that the postal establishment in each municipality in which, by virtue of the requirements in the «Objectives established in 15.09.2017», CTT is obliged to ensure the provision of the full range of the concession services, should be:

- a) a post station; or
- b) a post office with equivalent features, meeting a series of requirements relative to the form of providing concession services<sup>2</sup>.

To this end, CTT should submit a proposal which complements the density objectives with respect to: (i) postal establishments and other points of access to the postal network assigned to the concession; and (ii) minimum services provided, taking into account a specific reference framework established in the decision of 10.01.2019.

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<sup>1</sup>See <https://www.anacom.pt/render.jsp?contentId=1466756>.

<sup>2</sup> Requirements described in Annex 1 of the decision of 10.01.2019.

The reference framework – established in no. 1 of the decision of 10.01.2019 – to be taken into account by CTT for submission of its proposal of review of objectives (see no. 8 of the decision) was submitted to public consultation, pursuant to article 9, no. 2, subparagraph h) of the Statutes of ANACOM<sup>3</sup>.

The time limit for CTT to submit the proposal which complements the objectives of postal network density and minimum services provided defined in the decision of 15.09.2017 was established as 20 working days, with CTT having been notified of ANACOM's decision on 10.01.2019. An identical time limit was also established for response to the public consultation, with ANACOM also having publicised the decision on its website.

Following CTT's request, ANACOM, by determination of 06.02.2019, decided to extend the aforesaid time limits for an additional period of 10 working days<sup>4</sup>, partially granting the submitted request, which this ended on 21.02.2019.

By communication of 21.02.2019, CTT presented this Authority, within the time limit, a proposal that sought to complement the «Objectives established on 15.09.2017», as well as a pronouncement (designation given by CTT) on the decision of 10.01.2019.

By determination of 24.04.2019, ANACOM approved the analysis and decision on the proposal submitted by CTT, having concluded that this proposal, while having partially taken into account the reference framework set out by ANACOM, does not yet fully meet its requirements. In this context, this proposal was not accepted, with CTT having been given, pursuant to the law, a time limit of 30 working days to reformulate.

Consequently, CTT presented ANACOM a revised proposal, by communication of 14.06.2019, which complements the objectives of postal network density and minimum services provided established in the decision of 15.09.2017, with a view to complementing the previously submitted proposal so as to meet the users' needs as framed by ANACOM. On this same occasion, CTT also presented some general comments relative to the way in which CTT's right had been assured to express its opinion concerning the decisions endorsed by ANACOM and on the existence of exceptional circumstances that justify the reformulation of the objectives of postal network density and minimum services provided.

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<sup>3</sup> Approved by Decree-Law No. 39/2015, of 16 March.

<sup>4</sup>See <https://www.anacom.pt/render.jsp?contentId=1468051>.

The following section of this document presents a succinct analysis of the comments presented by CTT, as well as an analysis of the revised proposal submitted by CTT, in particular in view of what had been determined in the decision of 24.04.2019.

## **2. Analysis**

### **2.1. General comments**

#### **2.1.1. Position of CTT**

##### ***Right of CTT to express its opinion on the matter subject to public consultation pursuant to point 4.1 of the decision of 10.01.2019***

CTT noted that it could not accept ANACOM's conclusion, presented in point 3.2.1.1 of the decision of 24.04.2019, that it considered that CTT had been assured the right to express its opinion (in a preliminary hearing) on the matter subject to public consultation pursuant to point 4.1 of the decision of 10.01.2019. According to CTT, the circumstance of ANACOM resorting to the exceptional regime established in no. 2 of clause 15 of the Concession Contract and establishing a reference framework that is not confined to what is stated in its no. 3, constitute matters that “directly and strongly” affect its legal sphere. Therefore, they should not decide without CTT's preliminary comments, pursuant to article 122 of the Code of Administrative Procedure (CPA).

According to CTT, what is in question is the need for the correct sequencing of the acts leading to a final decision, which, in this company's opinion, did not happen in the present case, as the first stage of this procedure, the discussion on the existence, or not, of exceptional circumstances that could justify the reopening of the decision of 15.09.2017, was skipped, without justification.

##### ***Sending to CTT of all the necessary elements that could enable it to express its opinion properly on the matter in question***

CTT believes that, contrary to what was stated in point 3.2.1.2 of the decision of 24.04.2019, the procedure endorsed by ANACOM disrespected article 122 of the CPA, due to ANACOM not having sent CTT all the necessary elements or all the relevant aspects, in points of fact and law, which could have enabled CTT to express itself properly on the matter in question. CTT also argues that this conclusion is not overridden by the circumstance of CTT possibly

already having a set of relevant information in its possession, as the obligation incumbent on the Public Administration does not foresee any exception in this respect.

### ***Existence of exceptional circumstances***

CTT believes, contrary to what ANACOM argues in point 3.2.1.3 of the decision of 24.04.2019, that there were exceptional circumstances justifying a review objectives of postal network density and minimum services provided. CTT notes that the Concession Contract allows CTT total freedom to open and close postal establishments and modify its postal network under the rules of density and minimum services provided defined by ANACOM, and that CTT cannot be penalised (in the sense of being required to comply with additional obligations) for doing what the Concession Contract permits CTT to do, and least of all for the fact of the exercise of this entitlement not being considered “expectable”.

CTT also states, regarding this aspect, that the closure of postal establishments or the conversion of post stations into post offices is neither exceptional nor abnormal, and falls within its margin of contractual freedom, noting that the definition of objectives of postal network density and minimum services provided never resulted in different conditions according to the territorial circumscription in question.

CTT concludes by indicating that ANACOM has the necessary means to correct and penalise CTT for the noncompliance that it considers occurred, noting in this regard that the sample of inspection actions is insufficient to substantiate the decision to review the objectives of postal network density and minimum services provided. Furthermore, the statements according to which *“it could be concluded that the continuity of the provision of the service (subparagraph d) of article 11 of the Postal Law) would not be fully assured in situations of closure of post stations and/or their replacement by post offices”* constitutes a presumption that, according to CTT, not having been specifically verified, could not constitute grounds for the review of the objectives of postal network density and minimum services provided.

### **2.1.2. Understanding of ANACOM**

The comments presented by CTT concerning the matters identified above reflect, in general, the position that it had already conveyed in its pronouncement (designation given by CTT) on the decision of 10.01.2019.



Thus, and as, in general, no arguments were presented that had not already been considered during the appraisal made by this Authority for its decision of 24.04.2019, no reasons are found to change our understanding expressed regarding the matters in question, namely (and not prescinding from the additional details presented under the decision of 24.04.2019):

- a) In the case in question, CTT was assured the right to express its opinion on the matter under analysis, in which there was no recognition, on any occasion, of the placing in question of CTT's right to a preliminary hearing on the objectives that would be established at the end of the procedure concerned, or of its participation in the formation of the decisions affecting it;
- b) Access to the administrative procedure was given from 15.01.2019, i.e. 3 working days after the decision's notification date, with this being the relevant date, in legal terms, for considering that the procedure was made available to the interested party. Therefore, the arguments put forward by CTT on the alleged late provision of the relevant elements associated to the procedure cannot be accepted. Furthermore, it should also be noted that the decision of 06.02.2019 extended the time limit defined in the decision of 10.01.2019 by 10 working days;
- c) The developments that occurred after the decision of 15.09.2017, that established the objectives of postal network density and minimum services provided, evince a supervening change of the reality on which this decision was based, as demonstrated in the factual information collected by ANACOM and that substantiated the decision of 10.01.2019. This was reflected in the configuration of the postal establishment network assigned to the universal postal service (SPU) provider and, consequently, in the meeting of user needs. As none of this could have been anticipated based on the element known to ANACOM at that time, it is concluded that there are a series of exceptional circumstances that justified the review of the «Objectives established on 15.09.2017».

Mention should also be made of the lack of clarity of CTT allegation that the definition of objectives of postal network density and minimum services provided never resulted in different conditions according to the territorial circumscription in question. In this regard, it should be noted the objectives of postal network density and minimum services provided

currently in force (as stipulated in ANACOM's decision of 15.09.2017) clearly establish, for example, specific and differentiated objectives for urban areas and for rural areas.

## **2.2. Analysis of the proposal submitted by CTT on 14.06.2019, with a view to complementing the «Objectives established on 15.09.2017»**

Consequently, CTT presented ANACOM a revised proposal, by communication of 14.06.2019, which complements the objectives of postal network density and minimum services provided established in the decision of 15.09.2017, with a view to complementing the previously submitted proposal so as to meet the users' needs as framed by ANACOM.

In this respect, ANACOM's decision of 24.04.2019 established that CTT should complement the proposal submitted on 21.02.2019 in a manner taking into account, in detail, the reference framework defined in no. 1 of the decision of 10.01.2019 and, specifically, the requirements relative to the form of providing concession services stipulated in Annex 1 of the aforesaid decision of 10.01.2019 presented in detail in no. 2 of the decision of 24.04.2019.

As it had mentioned regarding the initially submitted proposal, CTT noted that the revised proposal was based on the following essential elements:

- a) Upgrading of the existing procedures and respective documentation, especially for training, assurance of the conditions of keeping secrecy and confidentiality, and customer satisfaction assessment mechanism;
- b) Improvement of the conditions of physical accessibility of persons with disabilities, **[Beginning of confidential information<sup>5</sup>]**  
**[Redacted]**  
**[End of confidential information<sup>6</sup>]**; and
- c) Strengthening of oversight procedures.

In order to facilitate the assessment of revised proposal, the following points refer to the contents of no. 2 of ANACOM's decision of 24.04.2019, followed by CTT's revised proposal

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<sup>5</sup> Hereinafter referred to as BCI.

<sup>6</sup> Hereinafter referred to as ECI.

(where the main changes in relation to the previously submitted proposal are underlined<sup>7</sup>) and of ANACOM's understanding on this. It should be noted that, as the revised proposal submitted by CTT on 14.06.2019 aims to complement the previously submitted proposal already analysed by ANACOM for the decision of 24.04.2019, this analysis focuses on the additional elements with which CTT complemented the previous proposal in order to ascertain whether they enable meeting the provisions in the decision of 24.04.2019, while maintaining the appraisal of all the other elements of CTT's proposal, as presented in this decision.

### **2.2.1. General points**

#### **Decision of 24.04.2019**

- a. *CTT's proposal should be clear as to the post offices to which the measures in question will be applied, where we highlight that the decision of 10.01.2019 stipulates that these should be the post offices that, in each municipality, provide the full range of the concession services and operate in 99% of the country's municipalities every working day for a minimum daily period of 6 hours and in the remaining 1% of municipalities every working day for a minimum daily period of 3 hours.*
- b. *CTT's proposal should include a glossary of the terms and concepts used in general in its procedures, with a view to fostering their clear and unequivocal interpretation.*

#### **Revised proposal of CTT**

"This proposal covers the post offices that, in each municipality, provide the full range of the concession services and operate in 99% of the country's municipalities, every working day for a minimum daily period of 6 hours and in the remaining 1% of municipalities every working day for a minimum daily period of 3 hours.

#### **GLOSSARY**

APC - Preventive and Corrective Action

GEP - Partner Manager

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<sup>7</sup> Changes of essentially editorial nature are not included.

CTT Store - Post station

PC - Post office

RSF - Prepaid postage - type of mail used by business clients to receive answers from their clients, with the cost of the service being charged to the sender (business client)

NAVe System - computerised system through which customer service is carried out at post stations (CTT Store) and/or post offices

Payshop System - computerised system used at some manual post offices to provide the service of payments, taxes, loading of mobile phones and payment of tolls

SLA - Service Level Agreement.”

### **Understanding of ANACOM**

CTT's revised proposal clarifies that the universe of post offices to which the measures in question will be applied are stipulated in the decision of 10.01.2019, also including a glossary as determined on 24.04.2019. Without prejudice to highlighting that the glossary may be complemented, on future occasions, with the introduction of additional concepts so as to foster greater transparency in procedures, ANACOM believes that CTT's proposal is in conformity with the decision of 24.04.2019.

### **2.2.2. Training**

#### **Decision of 24.04.2019**

*c. Regarding training, CTT's proposal should:*

- i. specify that the receivers of initial training and continuous training will be all the employees of the post offices that ensure the provision of the concession services, including those carrying out customer service duties for these services;*
- ii. ensure that the monitoring of the post office is done in the initial period of activity;*
- iii. explicitly refer (at least) to all the contents to be addressed during the training, which are indicated in the determination of 10.01.2019;*

- iv. *explicitly refer to the existence of training in real time in the presence of services requested by clients and training in simulation mode of other concession services;*
- v. *explain that, during continuous training, there should also be training when there are complaints about the procedures and form of providing services at the post office.*

### **Revised proposal of CTT**

*“a. In order to strengthen and complement the training that is currently already being ministered at post offices, CTT proposes the following training plan, applicable to all the employees that ensure the provision of the concession services:*

***Initial training:*** *2 days of theoretical component at a CTT Store + 3 days of practical follow-up at a CTT Store + 3 days of follow-up at a post office*

*The practical training will be ministered in real time, in the presence of services requested by clients, and training will be given in simulation mode of other concession services.*

*The initial training covers, among others, the following contents:*

- a) Onboarding and knowledge of the computer applications used and associated peripheral equipment to be used in customer service;*
- b) CTT portfolio - range of products and services, including the concession services, to be provided at the post office and corresponding operational procedures;*
- c) Standards and procedures in customer service;*
- d) Procedure to ensure compliance with the obligations derived from the legal system applicable to the provision of concession services, in particular with respect to the essential requirements established in the Postal Law;*
- e) Training in real time in the presence of services requested by clients and training in simulation mode of other concession services;*
- f) Training in handling of complaints, including procedures to be followed when they are made;*
- g) Code, conduct and ethics;*

h) Need to safeguard the secrecy and inviolability of postal items, as well as data protection and the protection of privacy, and the confidentiality of the conveyed or stored information in all services provided;

i) Behavioural training;

j) Sales techniques;

k) Specific manual to support use of the nave computer application and payshop terminal.

**Continuous training:**

- Training will be provided whenever there is a change in the existing range of products and services, change of procedures and changes in the operative system, when the employees of the post office request it, when complaints are made about procedures and form of providing services or when, for any other reason, the need for training is detected during supervision visits;

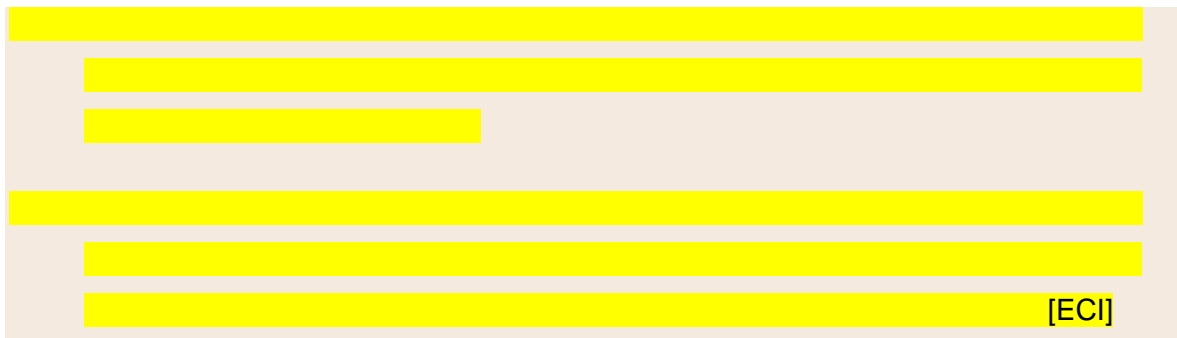
- [BCI]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[Redacted text block]



### **Understanding of ANACOM**

CTT's revised proposal clarifies that the receivers of the training will be all the employees of the post offices that ensure the provision of the concession services, including those carrying out customer service duties for these services. Moreover, it is also specified that the training will be ministered in real time, in the presence of services requested by clients, that training will be given in simulation mode of other concession services, and that continuous training will be held whenever, namely, complaints are made about procedures and form of providing the services. These clarifications meet the provisions in the decision of 24.04.2019.

With respect to the contents to be addressed during training, CTT's proposal includes all the topics identified in the decision of 10.01.2019. It also incorporates proposed topics considered relevant, namely *"Code, conduct and ethics"* and *"Need to safeguard the secrecy and inviolability of postal items, as well as data protection and the protection of privacy, and the confidentiality of the conveyed or stored information in all services provided"*. Therefore, also in relation to this matter it can be concluded that CTT's proposal enables meeting the provisions in the decision of 24.04.2019 concerning this point.

CTT's revised proposal foresees 3 days of follow-up at a post office during the initial training and that training can be triggered in the aftermath of complaints, when requested by the employees or when it appears necessary following supervision visits. Accordingly, it is believed that it is possible to conclude that the revised proposal enables ensuring, in terms of training, appropriate conditions for providing the postal services and the triggering of corrective actions, if necessary and in due time, without prejudice to the fact that no explicit reference was made to the follow-up in the post office being done in the initial period of its activity (nevertheless, assuming that the initial training is ministered in the initial period of activity of the post office), as stated in the decision of 24.04.2019.

In view of the above, it is we believe that CTT's proposal is in conformity with the decision of 24.04.2019.

### **2.2.3. Infrastructures and equipment**

#### **Decision of 24.04.2019**

*d. Regarding infrastructures and equipment, CTT's proposal should:*

- i. be clear and specific as to the need for the conditions of the premises to assure easy access to all users, including users with special needs;*
- ii. ensure that under provisional conditions the prerequisites for adequate provision of services should be assured at the post offices;*
- iii. specify the existence of external signage clearly identifying the post office.*

#### **Revised proposal of CTT**

*“a. The necessary equipment for providing the concession services are made available and maintained by CTT, where there is a service level agreement (SLA) with the provider of desktop management services, that renders the same service to all CTT Stores and Post Offices. In the event of unexpected circumstances with the SLA not being fulfilled, the post office is trained to ensure the provision of the service in a manual form.*

*b. CTT will ensure the good condition of the premises where the universal postal services are provided. In situations requiring an intervention at the premises, provisional conditions will be assured for the adequate provision of the postal service, namely by articulating with the post office in question the clear identification of the location for providing the concession services and any necessary procedures to be adopted, in the specific case.*

*c. The condition of the premises of the post offices should ensure safe access to the CTT customer service site, even in situations in which the post office is undergoing works.*

*d. CTT will assure the promotion of accessibility for users with special needs, throughout all the post offices considered.*



e. [BCI]

[Redacted text block]

[Redacted text block]

[Redacted text block]

[ECI]

- h. *Concerning metrological control of weighing scales, this aspect is already foreseen in the supervision check list, and is one of the points checked by the Partner Manager ("GEP"). This verification procedure will be reinforced, with GEP being responsible for issuing a preliminary and early request to check scale calibration to the competent entities, if it is found that the time limit will expire before the following visit. The calibration is valid up to the end of the year following that in which it is carried out.*
- i. *Post offices should inform CTT about intended works at the post offices which imply changes in location and conditions of provision of the service.*
- j. *CTT will assure that all post offices are properly identified with external signage, known as a banner, which can be of 3 types: Illuminated, metallic or self-adhesive. The type of flag to be used will be selected according to the type or architecture of the front elevation of the building where the post office is operating. Preferably, and whenever possible, an illuminated banner will be used."*

### **Understanding of ANACOM**

In its revised proposal, CTT undertakes to assure the good condition of the premises; also informing that the provisional conditions will be safeguarded to ensure the adequate provision of the postal services in situations requiring an intervention at the premises; and furthermore, assure the promotion of accessibility for users with special needs. At the same

time, the proposal also foresees that the access to the customer service site will be assured, even in situations in which the post office is undergoing works.

Moreover, CTT's proposal specifies the external signage to be adopted at post office in order to ensure their easy identification.

Accordingly, CTT's proposal meets the provisions determined in the decision of 24.04.2019, complying with the points that were identified therein as relevant to be included in the proposal to be submitted, thus complementing what had been proposed.

#### **2.2.4. Noncompliance**

##### **Decision of 24.04.2019**

*The decision of 24.04.2019 did not address this matter specifically, but merely indicated, regarding this point, the need for the proposal to clarify the universe of establishments in relation to which CTT's proposal would be applicable.*

##### **Revised proposal of CTT**

*"a. All the post offices foresee a procedure for recording noncompliance detected during moments of supervision by CTT.*

*b. The instituted procedure foresees the analysis and monitoring of noncompliance and corresponding monitoring to check its resolution and assess the respective efficacy."*

##### **Understanding of ANACOM**

It should be noted that CTT's revised proposal clarified (in point 2.2.1 above) that this proposal covers the post offices that, in each municipality, provide the full range of the concession services and operate in 99% of the country's municipalities every working day for a minimum daily period of 6 hours and in the remaining 1% of municipalities every working day for a minimum daily period of 3 hours. Additionally, the proposal clarifies that all these post offices will benefit from a procedure of recording noncompliance that is detected during moments of supervision by CTT, under the belief that this measures would be useful to ensure the appropriate monitoring of the operation of the post offices in

question, and thus contributing to ensure adequate conditions of provision of services to the users.

## **2.2.5. User satisfaction (clients)**

### **Decision of 24.04.2019**

*e. Regarding user satisfaction (clients), CTT's proposal should:*

- i. be clear and specific as to the periodicity of implementing methods to ascertain customer satisfaction, with the determination of 10.01.2019 explicitly stating that this should be conducted annually;*
- ii. indicate the implementation of actions with a view to solving causes of less satisfaction among users;*
- iii. be clear and specific as to the procedures to be implemented concerning complaints.*

### **Revised proposal of CTT**

*“a. The sample of satisfaction questionnaires will be doubled (at post stations and post offices). Customer satisfaction surveys will be carried out every six months in all zones served by these post offices. Aimed at further reinforcing the relevance of customer satisfaction for CTT, it is also important to note the conduct of market research in 2019 by an external company specialising in measurement of customer satisfaction.*

*b. [BCI]*

*[ECI]*

*c. All post offices should follow the procedures for acceptance, recording and forwarding of complaints defined by the applicable legislative and regulatory framework and by the international standards, pursuant to the Postal Law. These procedures, further detailed in CTT's manual of procedures for post offices, include the provision of information to the user on the existing means for making a complaint: physical and electronic complaint books; possibility of submission of a written complaint, in paper format, delivered at the Post Office; CTT Ombudsman; Post Stations (CTT); Mailbox: [reclamacoes@ctt.pt](mailto:reclamacoes@ctt.pt); and*

CTT line: 707262626. The post office employees should provide the means of making a complaint requested by the user of the service and ensure its proper forwarding, as per the procedure described in the manual.

d. The procedures for disclosure of these procedures and their monitoring during supervision visits will also be strengthened.

e. [BCI]

[Redacted text block]

[ECI]

f. In order to complete the information given to the user on all the available means of recording complaints, an item (self-adhesive) will be created and produced for posting next to the quality indices and price list at post offices.

g. Post offices should answer requests for CTT information/investigation within 5 (five) working days.”

### **Understanding of ANACOM**

The revised proposal submitted by CTT is clear regarding the periodicity of conducting customer satisfaction surveys. Although the decision of 24.04.2019 highlights that ANACOM's previous decision, of 10.01.2019, established customer satisfaction should be ascertained annually, CTT's proposal, in establishing six-monthly periodicity and coverage of all the zones served by the post offices in question, will enable closer and regular monitoring of the service provided to the clients. Therefore, it is considered appropriate.

Additionally, CTT's proposal also specifies the procedures that should be followed concerning complaints that are submitted, in particular that the users should be given information on the means of making complaints and that the appropriate forwarding of submitted complaints should be ensured. Here, the proposal refers to “CTT's manual of procedures for post offices” where the specification of the procedures is presented in greater detail. It should be noted that this manual of procedures for customer service at post

offices<sup>8</sup> effectively presents more detailed information about the procedures to be adopted by service providers in relation to the reception and handling of the received complaints, including, namely information that should be given to the users about completion of the complaint book and the forwarding of complaints to the competent authorities and to CTT itself. In this regard, ANACOM believes that CTT's proposal enables safeguarding ANACOM's concern as to the assured existence of a complete record of complaints and appropriate procedures for dealing with them. On this issue, special reference should be made to ANACOM's draft decision of 04.04.2019, which sought to determine CTT's correction of the information it discloses relative to the obligations established in the arrangement applicable to the complaint book, namely as to the existence and availability of the complaint book at post offices, which will contribute to ensure the appropriate recording and handling of any complaints submitted.

It should also be noted that CTT's revised proposal clearly states that [BCI]

[ECI], which will contribute to solve the causes of less satisfaction. In this context, we highlight that a higher densification of the actions in question will not be necessary, as, in principle, they will be specific to address any complaints received. Therefore, case by case analysis would be appropriate.

In view of the above, we believe that CTT's proposal, concerning this matter, is consistent with what was determined by ANACOM in the decision of 24.04.2019.

#### **2.2.6. Customer service**

##### **Decision of 24.04.2019**

*f. Regarding customer service, CTT's proposal should:*

- i. be clear and specific regarding the procedures for improvement that are proposed to be introduced at post offices;*
- ii. be clear and specific as to the form of providing customer service to users of postal services (which should be carried out in an organised and sequential manner,*

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<sup>8</sup> Version of 13.05.2015.

*respecting a first-come first-served basis exclusively applied to the users of the postal services);*

- iii. clarify that the secrecy and inviolability of postal items will be assured, as well as data protection and the protection of privacy in all the services provided, and the safeguarding of the confidentiality of the conveyed or stored information.*

**Revised proposal of CTT**

***a. [BCI]***

[Redacted text block]

***[ECI]***

- b. CTT ensures an individualised space for the provision of customer service and postal services at all the post offices that ensure the full range of the concession services in municipalities where there is no post station, properly identified, organised and tidy. The creation of a necessary distance space will be promoted, so as to protect the confidentiality of the conveyed or stored information.*

***c. [BCI]***

[Redacted text block]

***[ECI]***

- d. During the provision of customer service and postal service, and in view of the individualisation of the space for providing the postal service, and by virtue of the contractual obligation (according to the clauses of the contract in force with each post office), the specific training has been strengthened related to professional ethics and the*

need to safeguard the secrecy and inviolability of postal items, as well as data protection and the protection of privacy, and the confidentiality of the conveyed or stored information in all services provided, listed in the point above [relative to training]. This information will also be developed in the manual of procedures.

e. The customer service to users of postal services should be carried out in an organised and sequential manner.

f. At post offices that have no form of keeping postal items (notifications), we propose the creation of a CTT piece of furniture in order to create the conditions to assure secrecy.”

### **Understanding of ANACOM**

The revised proposal submitted by CTT specifies the procedures for improvement that are proposed to be introduced at post offices, highlighting that [BCI]

[REDACTED]

[REDACTED]

[REDACTED] [ECI]

With respect to the customer service provided to users of postal services, CTT's proposal clarifies that it should be carried out in an organised and sequential manner, meeting the provisions in the decision of 24.04.2019. Without prejudice to considering that the existence of an exclusive first-come first-served basis for postal service users could contribute to a more positive experience of use of the postal services at post offices, it is recognised, as referred to previously, that the procedure currently applicable at post stations does not actually clearly establish the existence of customer service with an exclusive order of arrival for users of postal services, although it is expected, in this case, that the majority of the users who go to post stations effectively seek to meet their postal service needs. As the adoption of an exclusive first-come first-served basis for the users of the postal services at post offices would represent a distinction in relation to the current practice of post stations, which was already recognised by ANACOM in the decision of 10.01.2019, and as, according to CTT, the implementation of this measure would imply changing the terms of the partnerships with the post offices, it is believed that, in general, CTT's proposal concerning this point enables safeguarding ANACOM's concerns relative to this matter. In this regard, it should be highlighted, in particular, that the waiting time is already addressed in the measurement of the respective service quality indicator, that it is also measured in

post offices, which will enable us to monitor this issue. Here, reference is made to the fact that its noncompliance could affect CTT's results (via reduction of the maximum price variation permitted for each year).

As to the need to safeguard the secrecy and inviolability of postal items, protection of data and privacy, and the confidentiality of the conveyed or stored information, it should be noted that CTT's proposal foresees the creation of a necessary distancing space to protect the confidentiality of the conveyed or stored information, and also refers to the organisation that is required to protect items, in order to ensure the secrecy and confidentiality of the conveyed and stored information. CTT's proposal also foresees the conduct of specific training on professional ethics and, in particular, the need to safeguard the secrecy and inviolability of postal items, protection of data and privacy, as well as the confidentiality of the conveyed or stored information in all services provided, also proposing to develop this information in the manual of procedures.

Accordingly, we believe that CTT's proposal is consistent with what was defined in the decision of 24.04.2019.

## **2.2.7. Information available to the public**

### **Decision of 24.04.2019**

*g. Regarding information available to the public, CTT's proposal should:*

- i. clearly indicate that the prompt provision of means to update the information to be made available to the public and the giving of instructions to the post offices to disclose the information in due time will ensure that the users have the relevant information by the time limits defined by ANACOM;*
- ii. specify that the opening hours should be fixed on the entrance door of the postal establishment.*

### **Revised proposal of CTT**

*“a. CTT will provide the means for the timely updating of the information to be made available to the public, instructing the post offices on the information to be provided at*



any given time, in advance and indicating the respective time limits, in order to ensure compliance with the deadlines imposed by ANACOM to CTT.

b. The information to be made available should be fixed in a visible place, complying with the applicable requirements; in particular, opening hours should be placed in a visible place outside the establishment, even when it is closed, preferably on the door of the post office. Supplementarily, the information is accessible and permanently updated on the website [www.ctt.pt](http://www.ctt.pt).

c. [BCI]

[ECI]

### **Understanding of ANACOM**

Concerning the information available to the public, CTT's revised proposal clarifies that means for updating the information available to the public will be provided. Post offices will also be instructed on the information to be made available, with the necessary time in advance to ensure compliance with the deadlines defined by ANACOM, thus meeting the provisions in the decision of 24.04.2019.

Furthermore, CTT's proposal clarifies that the information on opening hours should be placed in a visible place outside the establishment, even when it is closed, preferably on the door of the post office. It should be noted that the decision of 24.04.2019 explicitly stated that the opening hours should be fixed on the entrance door of the postal establishment. Although CTT's proposal does not unequivocally state that the information in question is placed on the entrance door of the postal establishment, it assures that it is placed in a visible place outside the establishment even when closed, which enables safeguarding ANACOM's concerns on this matter.

### **2.2.8. Post office operation**

#### **Decision of 24.04.2019**

h. *Regarding post office operation, CTT's proposal should:*

i. *include clear and specific reference to customer service provided to users of the concession services who enter the post office before its closing time.*

### **Revised proposal of CTT**

- “a. At the time of the supervision visits, which are never announced, the Partner Managers also check compliance with post office opening hours and customer service during the publicised opening hours. Any changes of opening hours must be authorised previously by CTT.*
- b. A reinforcement of the communication effort will be promoted, ensuring that the instructions are followed by strengthening the supervision model.*
- c. All clients who enter the post office before closing time will be attended, even if this implies going beyond the closing time.”*

### **Understanding of ANACOM**

CTT's revised proposal clarifies that clients who enter the post office before its closing time will be attended, thus complying with the provisions in the decision of 24.04.2019.

## **2.2.9. Control and supervision by CTT**

### **Decision of 24.04.2019**

- i. Regarding control and supervision by CTT, CTT's proposal should:*
- i. be clear and specific as to the existence of internal audits;*
  - ii. explain that the "Third Party Manager" should have, for each post office, a record of the relevant information for the activity developed therein, as indicated in Annex 1 of the decision of 10.01.2019;*
  - iii. establish the existence of documentation on the methods used, criteria adopted and results of the audits carried out.*

**Revised proposal of CTT**

**[BCI]**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[ECI]

### **Understanding of ANACOM**

The revised proposal submitted by CTT clearly indicates the conduct of internal audits to [BCI] [ECI] post offices [BCI] [ECI] (which comprises the total amount of post offices concerned in this proposal), and also presents information on its periodicity, stipulated so as to ensure the appropriate assessment of the internal control system, and about the object of these audits.

The proposal also states that [BCI] [ECI] should keep a record of relevant information, including the information specified in Annex 1 of the decision of 10.01.2019, and which will contribute to the proper monitoring and supervision of post office operation.

It should be noted that the decision of 24.04.2019 established the need for CTT's proposal to also stipulate the existence of documentation on the methods used, criteria adopted and results of the audits carried out. In this regard, although the revised proposal does not specifically mention this point, nonetheless, it does foresee, [BCI]

[ECI], thus contributing to a closer monitoring of post office operation.

In view of the above, and as the proposal also establishes that the Partner Manager should ensure the recording of the information relative to the results of the internal audits conducted to post offices, it can be concluded that CTT's proposal enables meeting the provisions in the decision of 24.04.2019.

### **3. Determination**

Based on the framework described in detail in the decisions of 10.01.2019 and 24.04.2019, namely with respect to the occurrence of a series of exceptional circumstances that legitimate the revision of the «Objectives established on 15.09.2017», and maintaining the conclusion on the need to complement these objectives with a view to ensure that the services provided in post stations and post offices comply with an equivalent standard of quality, and that all the necessary measures are adopted, in all postal establishments, to make sure that all postal establishments have the appropriate conditions to ensure the inviolability and secrecy of postal items, the confidentiality of the conveyed or stored information and the protection of personal data and privacy, fostering the confidence of the

users in the services provided and thus contributing to meeting their needs in terms of use of the postal services, and also considering that:

- a) according to the decision of 10.01.2019, confirmed by the decision of 24.04.2019, it was established, namely, that the proposal to be submitted by CTT should be based on the reference framework where the postal establishment that, under the objectives of postal network density and minimum services provided stipulated by ANACOM's decision of 15.09.2017, in each municipality, should provide the full range of the concession services (and operate in 99% of the country's municipalities every working day for a minimum daily period of 6 hours and in the remaining 1% of municipalities every working day for a minimum daily period of 3 hours) is.
  - i. a post station; or
  - ii. a post office with equivalent features, due to complying with the requirements relative to the form of providing the concession services established in Annex 1 of that decision;
- b) the revised proposal submitted by CTT on 14.06.2019 (which complements the proposal submitted on 21.02.2019 which was analysed by ANACOM in the context of the decision of 24.04.2019) enables concluding that the post offices where, in each municipality, CTT is obliged to ensure the provision of the full range of the concession services, possess the features that are considered appropriate to ensure the provision of the concession services under conditions equivalent to those of the post stations that, in other municipalities, perform the same duties;
- c) according to the decision of 10.01.2019, confirmed by the decision of 24.04.2019, the implementation of the measures established in the definitive decision that will be endorsed after the procedure of consultation of the users concerning this draft decision, should be assured within the time limit of 60 working days;
- d) by virtue of ANACOM's decision of 11.07.2019, the users were consulted, pursuant to the provisions in no. 7 of Base XV of the Universal Postal Service Concession, on the draft decision on CTT's proposal that complements the objectives of postal network density and minimum service provided established in ANACOM's decision of 15.09.2017. The comments received and ANACOM's opinion of them are presented in the "Report on the consultation of users on the draft decision relative to CTT's proposal,

of 14.06.2019, that complements the objectives of postal network density and minimum services provided established in ANACOM'S decision of 15.09.2017", which is an integral part of this decision,

ANACOM's Board of Directors, pursuing the responsibilities established in subparagraphs b), h) and i) of no. 1 of article 8 of its Statutes, approved by Decree-Law no. 39/2015, of 16 March, exercising the powers conferred by subparagraphs a), f) and o) of no. 1 and by subparagraphs b) and h) of no. 2, all of article 9 of the same Statutes, in pursuit and observance of the objectives and principles stipulated in subparagraphs b) and c) of no. 1 and in subparagraphs a) to d) of no. 2, both of article 2 of Law no. 17/2012, of 26 April (Postal Law, in the version in force), considering that there were supervening exceptional circumstances that, pursuant to no. 2 of Base XV of the Bases of the Universal Postal Service Concession (approved by Decree-Law no. 448/99, of 4 November, republished, after amendment, in an annex to Decree-Law no. 160/2013, of 19 November) and no. 2 of clause 15 of the Universal Postal Service Concession Contract, justify the revision of the objectives of postal network density and minimum services provided established by decision of 15.09.2017, and with a view to ensuring appropriate compliance with the obligations foreseen in subparagraphs a) to e) and m) in no. 1 of Base VIII and no. 3 of Base XXII of the aforesaid Concession Bases, and subparagraphs a) to e) and m) of no. 1 of clause 8 and no. 3 of clause 22 of the Concession Contract, as well as pursuant to no. 7 of Base XV and the same number of clause 15, determines

1. Its approval of the "Report on the consultation of users on the draft decision relative to CTT's proposal, of 14.06.2019, that complements the objectives of postal network density and minimum services provided established in ANACOM'S decision of 15.09.2017";
2. That the proposal which complements the objectives and rules of postal network density and minimum services provided that are in force, submitted by CTT on 14.06.2019, corresponds to the needs of the users pursuant to the current legal framework, and should, pursuant to the decision of 10.01.2019, confirmed by the decision of 24.04.2019, be implemented by CTT within the time limit of 60 working days.

Lisbon, 21 August 2019.

**Annex:**

Proposal that complements the objectives and rules of postal network density and minimum services provided that are in force, submitted by CTT on 14.06.2019 – **public version**





## ANEXO

### PROPOSTA PARA REVISÃO DOS OBJETIVOS DE DENSIDADE DA REDE POSTAL E OFERTAS MÍNIMAS DE SERVIÇOS QUE INTEGRAM O SERVIÇO UNIVERSAL POSTAL PARA POSTOS DE CORREIOS

A presente proposta abrange os postos de correios que, em cada concelho, prestam a totalidade dos serviços concessionados e funcionam em 99% dos concelhos do país, todos os dias úteis durante um período mínimo diário de 6 horas e no restante 1% dos concelhos todos os dias úteis durante um período mínimo diário de 3 horas.<sup>1</sup>

A proposta complementar dos CTT assenta nos seguintes **elementos essenciais**:

- (i) Aperfeiçoamento dos procedimentos existentes e respetiva documentação, especialmente na formação, garantia das condições de manutenção do sigilo e confidencialidade e mecanismo de avaliação de satisfação de clientes;
- (ii) Melhoria nas condições de acessibilidade para utilizadores de mobilidade reduzida, ***[Confidencial – informação relativa à forma como os CTT organizam a sua rede postal e gerem a relação com os seus parceiros];*** e
- (iii) Reforço dos procedimentos de fiscalização.

#### 1. – FORMAÇÃO

- a. De forma a robustecer e complementar a formação já hoje ministrada aos postos de correios, os CTT **propõem, o seguinte plano de formação, a aplicar a todos os colaboradores que asseguram a prestação dos serviços concessionados:**

Formação inicial: 2 dias de componente teórica em Loja + 3 dias de acompanhamento prático em Loja + 3 dias de acompanhamento no posto de correios.

**A formação prática será ministrada em tempo real, na presença de serviços solicitados pelos clientes e que será dada formação em simulação de outros serviços concessionados.**

**A formação inicial abrange, entre outros, os seguintes conteúdos:**

- a) **Ambientação com e conhecimento das aplicações informáticas utilizadas e periféricos associados a utilizar no atendimento;**
- b) **Portfólio CTT – oferta de produtos e serviços, incluindo os serviços concessionados, a disponibilizar no posto de correios e respetivos procedimentos operacionais;**
- c) **Normas e procedimentos no atendimento aos clientes;**

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<sup>1</sup> Texto adicionado realçado a negrito, para facilidade de referência



- d) Procedimentos para assegurar o cumprimento das obrigações decorrentes do quadro jurídico aplicável à prestação de serviços concessionados, em particular no que respeita aos requisitos essenciais previstos na Lei Postal;
- e) Formação em tempo real na presença de serviços solicitados pelos clientes e formação em simulação de outros serviços concessionados;
- f) Forma de tratamento das reclamações, incluindo procedimentos a seguir quando estas são apresentadas;
- g) Código, conduta e ética;
- h) Necessidade de salvaguarda do sigilo e inviolabilidade dos envios postais, bem como a proteção de dados e da proteção da vida privada, bem como a confidencialidade das informações transmitidas ou armazenadas em todos os serviços prestados;
- i) Formação comportamental;
- j) Técnicas de venda;
- k) Manual específico para apoio à utilização da aplicação informática nave e do terminal *payshop*.

Formação contínua:

- **Será prestada** formação, sempre que exista alteração na oferta de produtos e serviços, alteração de procedimentos e alterações no sistema operativo, quando os colaboradores do posto de correios o solicitem, **quando existam reclamações sobre procedimentos e forma de prestação dos serviços** ou **por qualquer outro motivo** seja detetada necessidade de formação ***nas visitas de supervisão. [Confidencial – informação interna relativa à forma como os CTT gerem a sua rede postal e supervisionam os diversos estabelecimentos postais]***

## **2 – INFRAESTRUTURAS E EQUIPAMENTOS**

- a. Os equipamentos necessários à prestação dos serviços concessionados são disponibilizados e mantidos pelos CTT, existindo um acordo de nível de serviço (correntemente designado SLA “Service Level Agreement”) com o prestador de serviços de gestão do *desktop*, que presta o mesmo serviço a todas as Lojas e Postos. Caso exista algum imprevisto e o SLA não seja cumprido, o posto de correios está formado para assegurar a prestação do serviço de forma manual.
- b. Os CTT garantirão o bom estado de conservação das instalações onde são prestados os serviços públicos universais. Nas situações em que exista necessidade de intervenção nas





instalações, serão acauteladas as condições provisórias para a adequada prestação do serviço postal, designadamente, articulando com o posto em causa a identificação clara do local da prestação dos serviços concessionados e dos eventuais procedimentos necessários adotar, no caso concreto.

- c. A conservação das instalações dos postos de correios deve garantir o acesso em condições de segurança ao local de atendimento CTT, mesmo nas situações em que o posto de correios se encontre numa situação de obras.
- d. **Os CTT garantirão a promoção da acessibilidade acesso por parte dos utilizadores com necessidades especiais, no universo de postos de correios considerado.**
- e. ***[Confidencial – informação interna relativa à forma como os CTT organizam a sua rede postal, nomeadamente nos postos de correio, e à forma como selecionam os seus parceiros].***
- h. No que concerne ao controlo metrológico das balanças, já se encontra previsto no *check list* de supervisão, sendo este um dos pontos verificados pelo Gestor de Parceiros ("GEP"). Será reforçado este procedimento de verificação, ficando o GEP incumbido de proceder a um pedido prévio e antecipado de aferição das balanças às entidades competentes, caso verifique que o prazo caducará antes da visita seguinte. A aferição é válida até ao final do ano seguinte em que mesma é realizada
- i. Os postos de correios devem informar os CTT sobre as obras que pretendam realizar nos postos e que impliquem alterações no local e condições de prestação do serviço.
- j. **Os CTT garantirão que todos os postos de correios são devidamente identificados com sinalética externa, designada por bandeirola, que pode ser de 3 tipos: iluminada, metálica ou autocolante. Dependendo da tipologia ou arquitetura da fachada do edifício onde funciona o posto, é selecionado o tipo de bandeirola a adotar; preferencialmente e sempre que seja possível será colocada a bandeirola iluminada.**

### 3 – DESCONFORMIDADES

- a. ***Todos os postos de correios terão previsto um procedimento de registo de não conformidades que sejam identificadas nos momentos de supervisão pelos CTT.***
- b. O procedimento instituído prevê a análise e acompanhamento das não conformidades e respetivo acompanhamento para verificação da resolução e avaliação da respetiva eficácia.

### 4 – SATISFAÇÃO DOS UTILIZADORES (CLIENTES)

- a. Será duplicada a amostra dos inquéritos de satisfação (em estações e postos de correios).  
**São realizados semestralmente inquéritos de satisfação dos clientes em todas as zonas**



**servidas por estes postos de correios.** Visando ainda reforçar a relevância para os CTT da satisfação dos clientes, importa ainda referir, a realização em 2019 de um estudo de mercado por uma empresa externa especialista em mediação da satisfação dos clientes.

- b. ***[Confidencial – informação interna relativa à forma como os CTT gerem as situações de menor satisfação dos seus clientes]***
- c. **Todos os postos de correios deverão seguir os procedimentos para aceitação, registo e encaminhamento das reclamações definidos pelo quadro legislativo e regulamentar aplicável e pelas normas internacionais, nos termos da Lei Postal. Tais procedimentos, melhor detalhados no manual de procedimentos dos CTT para os postos de correios<sup>2</sup>, incluem a prestação de informação ao utilizador sobre os meios de reclamação existentes – a saber: livros de reclamações físico e eletrónico; possibilidade de apresentação de reclamação escrita, em papel, entregue no Posto; Provedoria dos CTT; Estações de correios (Lojas CTT); Mailbox: [reclamacoes@ctt.pt](mailto:reclamacoes@ctt.pt) e linha CTT : 707262626 – , devendo o funcionário do posto disponibilizar o meio de reclamação solicitado pelo utilizador do serviço e dar-lhe o devido encaminhamento, conforme o procedimento descrito no manual.**
- d. Serão ainda reforçados os procedimentos de divulgação dos referidos procedimentos e respetivo acompanhamento nas visitas de supervisão.
- e. ***[Confidencial – procedimento interno dos CTT relativo à forma como os seus sistemas informáticos tratam as reclamações efetuadas pelos utilizadores]***
- f. **De forma a completar a informação ao utilizador sobre todos os meios de registo da de reclamações ao seu dispor, será criada e produzida uma peça (autocolante) para afixação nos postos de correios junto aos índices de qualidade e tarifário.**
- g. Os postos deverão responder aos pedidos de informação/averiguação dos CTT no prazo de 5 (cinco) dias úteis.

## **5 – ATENDIMENTO**

- a. ***[Confidencial – informação relativa a processos internos dos CTT relativos a melhorias nos processos de receção e organização de envios postais]***

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<sup>2</sup> O manual de procedimentos para os postos de correios encontra-se em revisão, neste particular, no âmbito do procedimento relativo à “Determinação para correção da informação divulgada pelos CTT – Correios de Portugal, s.a. respeitante à obrigação de disponibilização do livro de reclamações nos estabelecimentos de prestação de serviços postais”.





- b. Os CTT asseguram um espaço individualizado para atendimento e prestação dos serviços postais em todos os postos que asseguram todos os serviços concessionados em concelhos onde não existam estações de correios, devidamente identificados, organizados e arrumados. **Será promovida a criação de um espaço de distanciamento necessário para proteger a confidencialidade das informações transmitidas ou armazenadas.**
- c. **[Confidencial – informação relativa a processos internos dos CTT relativos a processos de organização do backoffice]**
- d. Durante o atendimento e prestação de serviço de correio, e face à individualização do espaço destinada à prestação do serviço de correios, e em virtude da obrigação contratual (de acordo com o clausulado do contrato em vigor com cada posto de correios), reforçada com a formação específica **relativa à ética profissional e à necessidade de salvaguarda do sigilo e inviolabilidade dos envios postais, bem como a proteção de dados e da proteção da vida privada, bem como a confidencialidade das informações transmitidas ou armazenadas em todos os serviços prestados, discriminada no ponto 1. acima. Tal informação será também desenvolvida no manual de procedimentos.**
- e. **O atendimento do utilizador de serviços postais deve ser efetuado de forma organizada e sequencial<sup>3</sup>.**
- f. Nos postos de correios que não tenham forma de guardar os objetos postais (avisados) propomos a criação de um móvel CTT de forma a criar as condições para garantir o sigilo.

## **6 – INFORMAÇÃO DISPONÍVEL AO PÚBLICO**

- a. Os CTT fornecem atempadamente os meios de atualização da informação a disponibilizar ao público, **comunicando aos postos de correios a informação a disponibilizar em cada momento, com antecedência e indicação dos respetivos prazos, de modo a assegurar o cumprimento dos prazos impostos pela ANACOM aos CTT.**
- b. A informação **a disponibilizar** estará afixada em local visível, obedecendo aos requisitos aplicáveis; **em particular, quanto aos horários, os mesmos serão colocados em local visível do exterior do estabelecimento, mesmo quando este se encontra fechado, preferencialmente na porta do posto de correios. Complementarmente, a informação é acessível e permanentemente atualizada no site [www.ctt.pt](http://www.ctt.pt).**

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<sup>3</sup> Conforme a ANACOM bem nota na deliberação de 10.01.2019, também não existe uma ordem exclusiva para os utilizadores dos serviços postais nas estações de correios, que também prestam outros serviços. Tal alteração implicaria a alteração dos termos das parcerias com os postos de correios, que não seria possível acomodar. O tempo de espera já é acautelado na medição do respetivo Indicador de Qualidade de Serviço, que é também medido nos postos de correios.



***[Confidencial – informação interna relativa à forma como os CTT gerem a sua rede postal e supervisionam os seus parceiros]***

## **7 – FUNCIONAMENTO DOS POSTOS DE CORREIOS**

- a. Aquando das visitas de supervisão, as quais nunca são anunciadas, os GEPs fiscalizam também o cumprimento dos horários de funcionamento dos postos e o atendimento aos utilizadores antes durante o horário publicitado. Quaisquer alterações de horários devem ser previamente autorizadas pelos CTT.
- b. Será promovido um reforço da comunicação, garantindo que são cumpridas as instruções através do robustecimento do modelo de supervisão, melhor detalhado no ponto 8.
- c. **Todos os clientes que entrem no posto de correios antes da hora de fecho de funcionamento serão atendidos, mesmo que seja ultrapassada a hora de fecho.**

**8 – *[Confidencial – informação interna relativa à forma como os CTT procedem ao controlo e supervisão dos estabelecimentos postais, nomeadamente os recursos humanos e técnicos utilizados em tal tarefa e que constituem informação interna da empresa]***