

## **Final Decision**

### **Results of the audits into the levels of quality of the universal postal service in 2016 and 2017**

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## 1. Background

CTT - Correios de Portugal, S.A. (CTT), as the concessionaire of the universal postal service, must implement a system for measuring levels of quality of service actually provided, and this measurement should be carried out at least once a year through recourse to an independent external body<sup>1</sup>.

By determination of 30.12.2014, the Autoridade Nacional de Comunicações (the National Communications Authority - ANACOM) established, under the provisions of paragraph 1 of article 13 of the Postal Law, the parameters for quality of service and performance targets associated with the universal postal service to be ensured by CTT for the 2015-2017 three-year period. In addition, by decision dated 13.03.2015, the performance objectives associated with the transit time for registered mail, which was applicable from 2016, inclusive, were also defined<sup>2</sup>.

By determination of 17.12.2015, ANACOM ordered CTT to correct, by 30.09.2016<sup>3</sup>, its repeated failure to comply with the obligation to carry out an independent measurement of the levels of quality of service using an independent external entity, under penalty of the application of a periodic penalty payment<sup>4</sup>.

In this context, on 30.09.2016 CTT informed ANACOM that, as of 01.10.2016, the measurement would be carried out by an independent external entity, PricewaterhouseCoopers/AG - Assessoria de Gestão, Lda. (PwC).

Thus, in 2016, the measurement of the values of the quality of service indicators was carried out by CTT in the first nine months of the year and, in the last three months, by PwC. In 2017, this was undertaken entirely by PwC.

ANACOM should ensure that levels of quality of service provided by CTT are submitted to audits and other control mechanisms carried out independently, in order to ensure the

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<sup>1</sup> According to paragraph 3 article 13 of Law No. 17/2012, of 26 April, in its current wording (Postal Law).

<sup>2</sup> The "Quality of service parameters and performance targets associated with the universal postal service" are available at <https://www.anacom.pt/render.jsp?categoryId=381195>.

<sup>3</sup> A period that was then necessary because the procedure for selecting the external entity had not yet been initiated by CTT.

<sup>4</sup> After having instituted offence proceedings for non-compliance in 2013, 2014 and 2015, which culminated in the voluntary payment by CTT of the applicable fines.

accurateness of data provided by it. The results of the audits or other control mechanisms carried out are the subject of a report, to be published on ANACOM's website<sup>5</sup>.

Likewise, CTT, as the universal service provider, must measure indicators on complaints received at least once a year, indicators as set by ANACOM, by determination of 12.12.2013<sup>6</sup>

In addition to the disclosure by CTT of the levels of quality of service offered<sup>7</sup> and the number of complaints and their resolution<sup>8</sup>, it is incumbent upon ANACOM to make available and keep up-to-date information that contributes to an open and competitive market, in particular information regarding the levels of quality of service offered and complaints received and handled by the universal service provider (CTT)<sup>9</sup>.

In the context of the aforementioned regulatory framework, ANACOM promoted an audit of the 2016 and 2017 annual values of CTT's quality of service indicators, complaints and information requests. Following a public tender launched on 21.07.2017, ANACOM decided on 21.09.2017 to award the undertaking of said audit to Grant Thornton & Associados, SROC, Lda. (hereinafter "Grant Thornton" or "auditors").

## **2. Main conclusions of the audit into quality of service indicators**

### **2.1. Determination of the results**

The audit concluded that the calculation of the quality of service indicators (QSI) was carried out according to the defined methodology and that there were no errors in the determination of the QSI values for the years 2016 and 2017, except for the calculation of the values for QSI4 (Standard mail not delivered within 15 working days) and QSI5 (Priority mail not delivered within 10 working days) in 2017.

According to the audit, the methodology applied in 2017 in the formula for calculating QSI4 and QSI5 was not correct, since only the lost items were considered by PwC, whereas items

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<sup>5</sup> According to paragraph 6 article 13 of the Postal Law.

<sup>6</sup> Pursuant to paragraph 5 and paragraph 6 of article 41 of the Postal Law.

<sup>7</sup> Pursuant to paragraph 4 of article 13 of the Postal Law.

<sup>8</sup> Pursuant to paragraph 6 of article 41 of the Postal Law.

<sup>9</sup> Points d) and f) of paragraph 1 of article 53 of the Postal Law.

with a transit time of over 15 working days, in the case of QSI4, and more than 10 working days in the case of QSI5, should have been considered. This situation:

- a) had an impact on the value of QSI4, where the value reported to ANACOM was 0.7 ‰ when it should have been 0.9 ‰, and did not have an impact on the value of QSI5, where the value reported to ANACOM corresponds to the value calculated with the correct methodology;
- b) however, it did not have a material impact on the conclusions regarding compliance, or not, with the target and minimum values set by ANACOM for 2017, since both the value of the QSI4 that was reported to ANACOM (0.7 ‰) and the value calculated correctly (0.9 ‰) meet the target value established for QSI4 (1.4 ‰).

The correction of the value of QSI4 also resulted in a correction of the value of the Overall Quality of Service Indicator (OI)<sup>10</sup> in 2017, which decreased from 110 to 109, a reduction that had no material impact in terms of meeting the OI target value (100), which continued to be met.

## **2.2. Measurement from 1 January to 30 September 2016**

The audit concluded that, between 1 January 2016 and 31 September 2016, the independence of the QSI measurement system could not be guaranteed, given that, during that period, those responsible for the measurement of the levels of quality were CTT, without recourse to an independent external entity<sup>11</sup>.

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<sup>10</sup> Considering that the OI value is calculated according to the individual values of the QSI and the degree of compliance with the target value of each QSI.

<sup>11</sup> This conclusion does not apply to QSI7 and QSI8 concerning the intra-community cross-border mail transit time, the values of which are calculated by CTT based on transit times determined by the UNEX measurement system (*Unipost Brand for External Quality of Service Measurement Systems* - <https://www.ipc.be/services/operational-performance-services/unex>), which are thus an input to the calculation made by CTT.

## 2.3. Measurement from 1 October 2016

### 2.3.1. Measurement of the QSI for national mail<sup>12</sup>

Regarding the measurement procedures implemented between 1 October 2016 and 31 December 2017, the period in which the measurement was carried out by PwC, the audit notes that:

- a) the items sent by PwC to panel members containing the test-mail objects (items designated as “large packets”)<sup>13</sup>, were easily identifiable because they contained the identification of the sender on the outside (PwC) and because of the size thereof;
- b) when the “large packages” were sent to the panel members, it was CTT that picked them up at the PwC premises, always on the same day of the week and always delivered for dispatch at the same post office;
- c) the panel members sent proof of the test-mail<sup>14</sup> and/or other forms to PwC, through CTT;
- d) in the case of the measurement of the QSI for standard mail, priority mail and registered mail, the envelopes of the test-mail contained a characteristic visible number which could be detected by CTT;
- e) in the case of the measurement of the QSI for parcels, the parcels used as test-mail always contained “salt” and the description on the item was “food products”;
- f) the parcels used as test-mail always contained the indication “consider abandoned” if not “picked up” by the (panel member) receivers in the postal establishments;

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<sup>12</sup> Conclusions applicable to the QSI for standard mail (QSI1 and QSI4), priority mail (QSI2, QSI3 and QSI5), newspapers and periodicals (QSI6), parcels (QSI9) and registered mail (QSI11).

<sup>13</sup> Items designated as “large packages” in the audit report. In turn, the test-mail objects were the postal items that the panel-member senders sent to panel-member receivers to measure the QSI.

<sup>14</sup> Throughout this document, references to “test-mail”, “test mail” and “test objects” have the same meaning.

- g) a part of the test-mail used for the measurement of the QSI for standard mail, priority mail and registered mail contained transponders<sup>15</sup>, which can be identified, due to their size and shape.

concluding that these procedures could easily lead to the identification of panel members, the induction points and receipt of the test-mail and the test-mail itself.

ANACOM therefore notes that the procedures implemented could lead to a possible predictability that does not ensure that the ultimate purpose of the measurement exercise is achieved (reflecting the quality of service offered to users).

### **2.3.2. Measurement of the QSI regarding the waiting time:**

Regarding the procedures for measuring the QSI for the waiting time at postal establishments (QSI 10), the auditors emphasize that the methodology adopted was not the most appropriate since it did not guarantee the anonymity of the technicians who measured the waiting times, given that:

- a) the measurement procedure was based on the presence of the person in charge of the measurement within the postal establishment, without taking any action (such as would be expected of any customer), waiting for the customer's entrance to start the measurement of the waiting time;
- b) at the end of the visit to the postal establishment, the person responsible for the measurement requested the person in charge of the postal establishment to sign and stamp the document where the information was collected, which does not guarantee the anonymity of the person responsible for the measurement;
- c) the person in charge of the measurement could make several visits to the same postal establishment, which also allows for the identification of that person by the employees of that postal establishment.

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<sup>15</sup> Object placed inside the test-mail objects that enabled the detection of its route through the capture of its signal by the operator's antennas (Source: QSI audit reports, 2016 and 2017).

Thus, the auditors conclude that there is a high probability of fallibility in the integrity of this methodology.

#### **2.4. Transit time for items with and without a transponder**

As part of the audit, a comparison was made between the transit time (and losses) of the test-mail items with and without transponders<sup>16</sup>, and the audit concluded<sup>17</sup> that there were (statistically) significant differences between the items with and without a transponder in the following 12 situations, in which in most the transit time is greater for non- transponder items<sup>18</sup>:

- a) in the case of the measurement made by CTT between 1 January and 30 September 2016 there were differences in all six QSI concerned (QSI1 and QSI4 for standard mail, QSI2, QSI3 and QSI5 for priority mail and QSI11 for registered mail), with the largest transit time in the case of non-transponder items, with the exception of QSI3 (Transit time for priority mail in MAM flows) where the transit time was lower in the case of non-transponder items;
- b) in the case of the measurement made by PwC between 1 October and 31 December 2016, there were differences in the transit time in two of the six QSI (QSI3 and QSI11), with in both cases the transit time greater in the case of non-transponder items;
- c) in the case of the measurement carried out by PwC between 1 January and 31 December 2017, there were differences in four of the six QSI (in the two QSI for standard mail and in the QSI2 and QSI3 for priority mail), with the transit time greater in the case of non-transponder items.

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<sup>16</sup> Transponders were used in the measurement of QSI regarding standard mail, priority mail and registered mail (i.e. QSI1 to QSI5 and QSI11).

<sup>17</sup> Based on the calculations performed at a 95% confidence level.

<sup>18</sup> The audit also identified differences in the remaining six situations, most of them also with greater transit times in the case of non-transponder items, although in these cases the differences were not considered (statistically) significant.

According to the audit report, although it is not possible to conclude with certainty, this situation could mean that there is a way for the transponder to be identified and therefore also the test-mail and the panel member.

## **2.5. Recommendations for improvement by the auditors**

Following the audit, the auditors made a set of recommendations - contained in chapter 3.7 of the reports with a summary of the audit findings for each of the years 2016 and 2017, published simultaneously with the draft decision (DD) that gave rise to this decision - aimed at correcting the aspects identified above.

## **2.6. ANACOM Conclusions**

In view of the audit findings, ANACOM notes that:

- a) the procedures for measuring the QSI of national mail do not guarantee that the panel members, the points of induction and reception of the test-mail and the test-mail itself are not identified, which may lead to the results of the test-mail sample running the risk of not reflecting the quality of service actually provided by CTT, since it is not guaranteed that the test-mail may not be treated differently, and more favorably, than real mail items;
- b) the waiting time measurement procedures may allow the employees of the postal establishment to behave differently when in the presence of the person in charge of the measurement of the waiting time, which may result in the results obtained through the sample running the risk of not reflecting reality,

and therefore intends to carry out the determinations and recommendations identified in Chapter 4, which aim, in particular, at ensuring that panel members, test-mail, induction points and receipt of test-mail, as well as the measurement of waiting times in postal establishments, are not identified.

### **3. Main findings of the audit on indicators regarding complaints and requests for information**

#### **3.1. Determination of the results**

For the 2016 and 2017 figures for the indicators on complaints and requests for information under the universal postal service, the audit:

- a) identified some divergences from the values for complaints and requests for information reported by CTT to ANACOM<sup>19</sup>, concluding, however, that the differences determined were not materially relevant due to their weighting in the total number of cases;
- b) identified the existence of errors in date definition fields (especially the date of entry of cases at CTT), with an impact on the average response times to complaints and requests for information, the materiality of which, according to the adopted methodology, did not allow auditors to form conclusions concerning the accuracy of response times reported by CTT<sup>20</sup>;
- c) concluded that, despite the procedures established by CTT for the correct definition and classification of the reasons for complaints, the process of assigning the final reasons for each complaint/request for information was subject to a certain level of subjectivity on the part of the operator registering the information in the system.

ANACOM emphasizes that the audit carried out, focusing on the procedures and on the database where complaints and requests for information were registered, does not allow us to conclude that all the complaints and requests for information made were included in the audit.

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<sup>19</sup> In particular, cases relating to complaints answered, requests for information answered and cases received, which should not have been included in the CTT report as they did not relate to services within the scope of the universal service, as well as some differences in the level of scope (e.g., national versus international).

<sup>20</sup> For each of the years 2016 and 2017, a sample of 138 complaint cases and 138 requests for information cases, which were representative of the respective population, was analyzed, to allow the inference, at a confidence interval of 95 %, regarding the percentage of cases with nonconformities in the total population.

The audit noted, however, that there are several avenues of entry for the client to make complaints<sup>21</sup>, and out of the total of complaints received, less than one third were received at post offices and less than 0.5% were made at post stations.

### **3.2. Recommendations for improvement by the auditors**

Following the audit, the auditors made recommendations (contained in the reports summarizing the audit findings for each of the years 2016 and 2017, published simultaneously with the DD that gave rise to this decision), which aimed, in particular, to ensure greater control in verifying the data entered into the system (in order to correct errors detected, essentially at the level of entry dates for the cases), and to reduce some of the subjectivity underlying the classification of reasons for complaints and requests for information.

### **3.3. Conclusion**

In view of the audit findings, ANACOM intends to carry out the recommendations identified in the next chapter, which aim to ensure greater control in verifying data entered into the system (in order to correct errors detected, essentially at the level entry dates for the cases) and reduce situations of doubt or open to different interpretations in the classification of the reasons for complaints and requests for information.

## **4. Decision**

Whereas:

- a) what is mentioned in the preceding chapters;
- b) that, by determination of 11.10.2018, the Board of Directors approved the DD on the results of the audits into the levels of quality of the universal postal service offered in 2016 and 2017, which was submitted to the:

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<sup>21</sup> Complaints book, mail and fax, NAVE platform (platform, specifically, available at post offices), CTT Internet websites, email, call centre, physical and electronic forms for complaints, CTT Ombudsperson, among others.

- a. prior hearing of CTT, pursuant to articles 121 and 122 of the Code of Administrative Procedure;
- b. public consultation, under the terms of article 9 of the Postal Law, taking into account that the measures to be imposed affecting the universal postal service, thereby benefiting and thus significantly impacting the market, in particular users of the universal postal service;
- c) the contributions received in the context of these procedures, the analysis of which is set out in the “ Report on the prior CTT hearing and on the public consultation to which the DD was submitted regarding the results of the audit into the levels of quality of the universal postal service in 2016 and 2017“,

the Board of Directors, through the exercise of the attributions and powers conferred on ANACOM by points h) and i) of paragraph 1 of article 8 and by points g), h), i), l), n) and o) of paragraph 1 of article 9, all from its Statutes, approved by Decree-Law no. 39/2015, of 16 March, in the exercise of the powers conferred on it by point b) of paragraph 1 of article 26 of its Statutes, and taking into account the provisions of paragraph 5 and paragraph 6 of article 13, paragraph 5 and paragraph 6 of article 41, and points d) and f) of paragraph 1 of article 53, all from Law no. 17/2012, of 26 April, in its current wording:

**I. Determines that, within the scope of the QSI relating to transit times for postal items<sup>22</sup>:**

1. The sending of the test objects or any documentation relating to or related to the test objects, by the entity that measures the QSI values to the panel members (individuals or companies) participating in the QSI value measurement system is carried out through of one, or a combination of several, of the following procedures, preferably in the following order in which they are presented:

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<sup>22</sup> Determinations applicable to the measurement of the ISQs for standard mail, priority mail, bulk mail and newspapers and periodicals.

- a) Delivery of large packages <sup>23</sup> by hand to panel members in large urban centres (delivery by the entity carrying out the measurement) and through other service providers in the remaining regions of the country.
- b) Delivery of the large packages, directly by the entity carrying out the measurement or by entities other than CTT, contracted by that entity for this purpose, in various postal establishments and not always in the same, also rotating the postal establishments used for this purpose (not repeating the same within a month, for example).
- c) Deliveries of large packages on several days of the week and not on a single day of the predetermined week.
- d) Sending test objects to the panel members via email, thus eliminating the physical sending through large packets.
- e) The format and appearance ("packaging") of the large packages sent to panel members should vary, not all of them having the same format and appearance.

Other procedures may be adopted to ensure the fulfillment of the same objectives that are intended to be achieved with this determination, provided they have been previously approved by this Authority.

2. The entity that undertakes the measurement of the QSI values implements procedures similar to those referred to in point 1, with the necessary adaptations, for the return or dispatch of the test objects or any documentation relating or related to the test objects, by the panel members to the entity which carries out the measurement of the QSI values. In this context, when the sending is made through physical means, a single point cannot be used to receive the items sent by the panel members. The format of the items returned to the entity that carries out the measurement should also be varied.

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<sup>23</sup> The "large packages" are items forwarded by the entity carrying out the measurement to panel members, which contain, in particular, test objects to send by the dispatch panel members to receiving panel members.

3. The appearance of the test objects cannot deviate from the appearance of real mail items, such that:
  - a) The test objects do not have any elements that allow their identification as such, in particular, on the outside they do not contain any element identifying the entity carrying out the measurement of the QSI values.
  - b) A part of the test objects is handwritten, that is, the address and recipient fields of the same test object are handwritten, accepting as an exception only those situations in which CTT has suitable proven, through studies of real mail or other reality-based evidence, that there are no real handwritten mail items.
  - c) In the addressing of test objects, different types of characters (letter fonts) and spacing between characters and lines are used throughout the year and at any moment, so that the addressing of test objects sent and received weekly by each panel member is not uniform<sup>24</sup>. The sender and recipient addressing mode on each test object must, however, be the same, except in cases where real mail submissions sent by the sender panel member actually have different formats.
4. The use of test objects with transponders is not permitted, except when prior authorization from ANACOM has been given for this purpose. Transponders (and the technology used therewith) that can be used shall meet, in particular, the following requirements:
  - a) Are only used for the purpose of validating the information reported by the panel members.
  - b) Do not allow identification of the test objects.
  - c) Do not allow identification of the point of induction of the test object in the postal network and the point of delivery to the recipient.

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<sup>24</sup> In any event, respecting the addressing rules that are specified by CTT, which seek to improve the reading of addresses and the automatic processing of postal items, contributing to improving the quality of service provided by CTT and to the efficiency of the operational process and, therefore, to the provision of the postal service.

- d) Do not allow CTT to have access, within a period of up to 5 working days after the first reading of the transponder in the CTT network (each time that it is used), to any transponder information; including information concerning the first reading.
  - e) Do not allow CTT to have access to any information about the induction point, the receiving point and its rotation, although it can have access to the type of network point where the object circulated (e.g., Postal distribution centre, Logistics and production centre, post office), without identifying exactly which (e.g., *Sete Rios* post office).
5. The panel members and the induction and reception points that are part of or have been part of the QSI measurement panel during the period 01.10.2016 to 31.12.2018 may not form part of the QSI measurement panel and may not rejoin that panel for the three following years.

ANACOM may accept that:

- a) The same point of induction may continue to be used or be reintroduced within a period of less than three years, provided that its maintenance or reintroduction is demonstrated to be necessary to maintain the representativity of the sample.
  - b) The same panel member-company may continue to be used or be reintroduced within a period of less than three years, provided that its maintenance or reintroduction is demonstrated to be necessary to maintain the representativeness of the sample.
  - c) The same private panel member may be reintroduced within a period of less than three years, but provided that at least 12 months have elapsed since its replacement, provided that its reintroduction is demonstrated to be necessary to maintain the representativeness of the sample.
6. Each panel member, each induction point, and each receiving point cannot be part of the panel for a consecutive period of time greater than four years.
- ANACOM may accept that:

- a) The same induction point may be used for a consecutive period of time greater than four years, provided that its maintenance is demonstrated to be necessary to maintain the representativity of the sample.
  - b) The same panel member-company may be used for a consecutive period of time of more than four years, provided that its maintenance is demonstrated to be necessary to maintain the representativeness of the sample.
7. The panel members, in carrying out their functions as sender and/or receiver, maintain a similar profile (in terms of types and quantities of postal items sent and received) to that which they had before starting these functions, respecting in all cases the limits on postal items sent and received, established in the measurement methodologies (standards) determined by ANACOM.

**II. It hereby determines that in the context of the QSI related to waiting times in postal establishments**, the procedure used to observe waiting times is carried out through mystery customers, where the observers that carry out the measurement of waiting times move and carry out actions in the postal establishments as if they were a typical customer, such that:

1. The same observer (mystery customer) cannot collect information more than three times in the same postal establishment in the same year;
2. The same observer may not carry out the collection of information in the same postal establishment before at least four months have elapsed since their last data collection at that establishment.

**III. It hereby determines that in the framework of the QSI relating to transit times for postal items and QSI related to waiting times in postal establishments:**

1. The entity that carries out the measurement of the QSI values maintains, on file, a copy of the database used for the calculation of the annual values of the QSI reported to ANACOM, under conditions that allow it to be made available and analyzed in an audit.

A copy of the report shall be sent to ANACOM together with the report of the annual values for the QSI. In the case of QSI which are measured on the basis of test objects (QSI referring to standard mail, priority mail, bulk mail and newspapers and periodicals), the database does not contain information allowing for the identification of the panel member and the points of induction and reception for the test objects.

2. The information system used to measure the QSI values keeps track of the changes made at each moment, identifying which user, and when and what was changed.
3. Regarding the representativeness of test-mail vis-à-vis real mail (for QSI measured on the basis of test objects) and the representativity of the observations to be made in the postal establishments (regarding the measurement of the QSI regarding waiting time):
  - a) The updating of the sending and observation matrices of the QSI sample is carried out at least every three years, and the following must also be ensured:
    - i. In the cases of postal items: the representativeness of the real mail.
    - ii. In the case of observations of waiting times: the frequency and distribution of services throughout the day and week, the geographical distribution and the type of postal establishments.
  - b) In accordance with the methodologies for measuring QSI for normal mail (standard EN 14508), priority mail (standard EN 13850), regular mail in bulk and newspapers and periodicals (standard EN 14534), determined by ANACOM in its decision of 12.07.2018, real mail studies are carried out at least every three years, the same applying to studies for the purpose of the measurement of waiting time-related QSI.
  - c) The updating of sample item matrices is carried out on the basis of recent real traffic information, collected not earlier than the year prior to the application of the new item matrix (i.e., for the purpose of determining the item matrix to be applied in the determination of QSI in years  $t$  to  $t + 2$ , the

real traffic information to be used in the real mail studies should not be earlier than year  $t-1$ ). Likewise, the updating of observations in postal establishments is also carried out on the basis of data collected not before the previous year.

- d) Actual mail studies consider the provisions in the aforementioned standards EN 13850, EN 14508 and EN 14534, particularly including the analysis of the discriminating variables and geographical stratification provided for in those standards.
- e) Taking into account that these standards offer some freedom in specifying the characteristics to be incorporated in the studies of real mail, prior to the carrying out of each study, CTT shall submit for ANACOM's approval a proposal for the possible discriminating features and geographical stratification to be analyzed in the study, for the purpose of prior definition thereof, and the proposal must include at least the list of features identified in those standards.
- f) Actual mail studies are presented to ANACOM which may determine the holding of an audit on the methodology used and the results obtained. Real mail studies occur at least two weeks of the year, spaced apart.
- g) The whole process of collecting and processing real traffic data (and observations at postal establishments), to support the definition of the statistical designs of the QSI, is duly documented in electronic format. A copy of this is sent to ANACOM.
- h) The 2019 measurement is based on real mail studies (and surveys of observations in postal establishments) carried out as defined in points a) to g). For this purpose, if the completion of the real mail studies occurs during the year 2019, the results of the real studies will be used to calculate the annual values of the QSI in 2019 by properly weighting the results by geographical flow/discriminating feature, and therefore applying the

provisions of the last paragraph of point 7.3.3 of standard EN13850, with the necessary adaptations<sup>25</sup>.

**IV. It hereby recommends that, within the framework of the QSI:**

1. The entity that performs the measurement of the QSI values adequately compensate panel members, to ensure the participation and continuity of the same panel, by performing the tasks that are required to ensure correct measurement of the quality of service.
2. In the context of the validation of the information underlying the determination of the values of the various QSI, specifically the validation of the information reported by the panel members and the information inserted in the database to calculate the values of the QSI, procedures are to be adopted by the entity that carries out the measurement of the values of the QSI, which reduce manual intervention throughout the system, such as procedures for optical reading of informational elements of test objects to identify dates/hours of the handling of objects at points in the postal network.
3. In the context of the validation of the information underlying the determination of the QSI values for newspapers and periodicals, particularly validation of the information reported by the senders and receivers and registration of the same in the database for calculating the values of these QSI, as well as for later clarification and control thereof (in particular in the context of audits or other control mechanisms to be carried out by ANACOM), the entity that performs the measurement of the QSI values shall draw up a table describing errors associated with the information from the test objects in an analogous manner to that already done in the case of the QSI referring to standard mail and priority mail, creating a field in the database to register the applicable error, if such exists.

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<sup>25</sup> The last paragraph of section 7.3.3 of EN13850: 2012, states that "In case of the first measurement period or a running system with shifting mail flows, information from real mail studies conducted continuously during the measurement period (parallel run of real and test-mail studies) shall be used at the time when the weighting basis for the calculation of the report is defined".

**V. It hereby recommends that, within the system for dealing with complaints and requests for information:**

1. The process of assigning the final reason (of a complaint or a request for information) is improved in order to reduce situations of doubt or susceptible to different interpretations in the classification of the reason attributed to each case, for example by presenting, to the team that analyzes and classifies the cases, practical cases on how previous cases were resolved in which there were doubts or disagreements as to the classification to be assigned.
2. Additional controls to validate the registration of information on the complaints and requests for information cases are to be implemented in order to reduce the occurrence of registration errors.

**VI. It hereby determines that CTT shall implement the measures in points I to III, simultaneously, by 01.07.2019, and in any event, CTT shall inform ANACOM 30 days before the date on which such implementation takes place.**

**VII. It hereby determines that this decision shall remain in force after 31.12.2020, should CTT remain as the company providing the universal postal service after that date.**

**VIII. It hereby approves the "Report on the prior CTT hearing and on the public consultation to which the DD was submitted regarding to the results of the audit into the levels of quality of the universal postal service in 2016 and 2017" which forms an integral part of this decision.**