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Mr Robert Wright
General Manager—Water and Wireline Markets

Australian Competition and Consumer Commission GPO Box 520
MELBOURNE VIC 3001

15 October 2015

Dear Sir,

I come to you as a company that provides a solution for thousands of small business and consumers to help them secure parcel delivery services in Australia.

Our position is neutral regarding the price of stamps for consumer delivery, and have trust and faith in the ACCC to work out the best position in this domain.

However, we ask that any consideration of Australia Post’s legislated monopoly in the letter domain should take monopoly practices in other domains into account. Providing Australia Post further resources while allowing monopoly practices in its non-restricted activities reduces market competition and hurts consumers.

In particular, there is one monopoly practice that we ask that you consider making a ruling on as part of this process: Australia Post’s refusal to let other courier services deliver to Post Office Boxes.

Currently, Australia Post has tens of thousands of Post Office Boxes across Australia, which it offers on a paid subscription basis to consumers. What many people are unaware of, however, is that Australia Post prevents delivery to these Post Office boxes by anyone but Australia Post.

In practice, this means that there is only one delivery option for consumers and businesses who want to deliver to Post Office Boxes: Australia Post.

We believe this is the same as if Telstra only allowed mobile phone calls to Telstra home phones if you were a Telstra customer. Clearly this would be an abuse of a dominant market position.

We also understand that it places Australia Post at an unfair advantage in winning tenders, which inflates the price of courier services in the market in general.

The consumer who rents the Post Office Box is also at a disadvantage as they can only accept deliveries from Australia Post. For consumers in rural or regional areas who may rely on a Post Office box for their deliveries, it restricts services involving deliveries (such as e-commerce) that they may be able to access online. We believe this is an unintended consequence of the monopoly granted to Australia Post and the postal delivery service.

In addition, many consumers are not aware of this restriction on their use of a Post Office Box. We cannot find any mention of this limitation in the PO Box terms and conditions.

We strongly believe that by **only** allowing Australia Post and its subsidiaries to deliver to Post Office boxes (that consumers are renting and paying for) Australia Post is abusing its monopoly position in the market, reducing competition and hurting consumers. We respectfully ask that you take this into consideration before you give Australia Post additional resources to further entrench its Monopoly position in the market.

We would be very happy to make ourselves available to talk with the Commission about this and provide further evidence as required.

James Moody, CEO, Sendle

Sendle makes parcel delivery services available to small businesses and consumers, by unlocking large business delivery infrastructure for everyone