



REPUBLIC OF SINGAPORE

INFO-COMMUNICATIONS DEVELOPMENT AUTHORITY OF SINGAPORE

LETTER BOX SPECIFICATIONS AND GUIDELINES

ISSUED ON 2 OCTOBER 2009

1. INTRODUCTION
2. RESPONSE TO COMMENTS RECEIVED IN THE PUBLIC CONSULTATION
ON THE PROPOSED AMENDMENT TO LETTER BOX SPECIFICATIONS AND
GUIDELINES
3. CONCLUSION

LETTER BOX SPECIFICATIONS AND GUIDELINES

In exercise of the powers conferred by Section 16 of the Postal Services Act (Cap 237A) (the “**Act**”), the Info-Communications Development Authority of Singapore (“**IDA**”) hereby issues the Letter Box Specifications and Guidelines (the “**Guidelines**”).

1. INTRODUCTION

- 1.1 Under Section 16 of the Postal Services Act, IDA can issue or amend specifications relating to the number, place, dimensions and other characteristics of letter boxes. IDA last reviewed the Letter Box Specifications and Guidelines in 2005, and authorised Singapore Post Ltd (“**SingPost**”) to administer the Guidelines, to ensure that property developers conform to the design and installation of letter boxes.
- 1.2 In light of the new regulatory and operating environment after the liberalisation of the Basic Letter Services market in 2007 (“**Postal Liberalisation**”), it was necessary for IDA to update all relevant regulatory frameworks pertaining to the Basic Letter Services market. Accordingly, IDA conducted a review of the Guidelines, and on 2 January 2009, IDA issued a revised version of the Guidelines for public comment.
- 1.3 IDA received six submissions in response to the public consultation, from: AJ Couriers Pte Ltd, the Real Estate Developers’ Association of Singapore, the Singapore Institute of Surveyors and Valuers, SingPost, Swiss Post International Singapore Pte Ltd, and a combined response from 14 Town Councils (the aforementioned parties will be referred to collectively herein as the “**Respondents**”). IDA would like to thank all the Respondents for their valuable inputs.
- 1.4 Taking into consideration the comments received, as well as IDA’s policy objectives, IDA has finalised the Guidelines. This document sets out IDA’s response to the comments received in the public consultation and explains the rationale of IDA’s decisions.

2. RESPONSE TO COMMENTS RECEIVED IN THE PUBLIC CONSULTATION ON THE PROPOSED LETTER BOX SPECIFICATIONS AND GUIDELINES

Handing of Undelivered Mail to Developers, Owners, Managing Agents or Town Councils

- 2.1 In Section 1.3 of the proposed Guidelines, IDA had suggested that, where letter boxes have yet to be constructed/provided for occupants of a building on or before date of TOP, and there are already mail items for the occupants, the Postal Service Operators (“**PSO**”) may pass such mail items to the developers, owners, managing agents or town councils, for onward delivery.

- 2.2 Several Respondents asked IDA to reconsider this proposal, highlighting that the developers, owners, managing agents or town councils would neither have the space to store such undelivered mail, nor the manpower and expertise to deliver the mail to the occupants. Instead, the Respondents suggested that any undelivered mail should continue to be held by the PSOs themselves.
- 2.3 IDA agrees with the comments raised by the Respondents. Accordingly, IDA has amended the Guidelines to state that PSOs should only pass the mail to the owners, managing agents or town councils if they agree to undertake onward delivery to the residents. Otherwise, the PSOs should find other ways to deliver the mail, failing which they should treat such mail as being undeliverable.

Repair and Maintenance of Letter Boxes

- 2.4 One Respondent raised concerns with the drafting of Section 1.3 of the Guidelines. The Respondent highlighted that the letter boxes serve individual owners and are not common property, thus the managing agent should not be responsible for repair and maintenance of the letter boxes.
- 2.5 IDA notes the Respondent's clarification and we have therefore removed the reference in the Guidelines.

SingPost's Liability for Damage to Letter Boxes

- 2.6 One Respondent had highlighted that SingPost should not be held liable for mail violation should other parties also hold duplicates of the Pigeonhole Masterdoor Keys.
- 2.7 IDA is of the view that SingPost cannot be absolved from *all* liability for mail violation incidents based simply on the fact that other parties hold duplicates of the Pigeonhole Masterdoor Keys. However, IDA agrees that SingPost should not be held liable if it is found that the incident arose from no fault on its part. IDA has therefore amended Section 3.8 of the Guidelines to clarify that SingPost shall not be held liable for any mail violation arising from no fault on its part.

Obstruction of Letter Boxes

- 2.8 One Respondent highlighted that Section 1.4 of the Guidelines states that letter boxes should be "easily accessible". However, the Respondent commented that the location of letter boxes were often obstructed and it asked IDA to specify in the Guidelines that letter boxes should be "easily accessible and *without obstruction*".
- 2.9 IDA would like to clarify that Section 16(5) of the Act already imposes a requirement on building owners to ensure that the location of the letter box is

cleared from any obstruction. Nevertheless, to reinforce this obligation, IDA accepts the Respondent's suggestion and has amended the Guidelines.

Submission of Documentation for Approval of Letter Boxes to SingPost

- 2.10 Section 1.10 of the Guidelines currently suggests that SingPost must be informed in writing by the Qualified Person, the developer, owner, managing agent or town council before contractors are allowed to submit, on their behalf, the necessary documentation to SingPost to seek approval for the design of the letter boxes.
- 2.11 One Respondent suggested that IDA modify Section 1.10 of the proposed Guidelines, to allow contractors to submit the necessary documentation to SingPost as long as they have an authorisation letter from the building developer, owner, managing agent or town council. IDA agrees with this suggestion and has amended Section 1.10 of the Guidelines accordingly.
- 2.12 For clarity, IDA has also specified in Section 1.10 of the Guidelines that the documentation for submission must be duly endorsed by the relevant parties in order to allow SingPost to confirm the validity of the documentation.

3-way Letter Box with Masterdoors and Access to Masterdoor Keys

- 2.13 In the proposed Guidelines, IDA had:
- a) recommended that all masterdoor keys which grant access to the letter box pigeon holes (the "**Pigeonhole Masterdoor Keys**") be handed to SingPost, and not be passed to any other third party, in order to prevent any compromise of mail security and integrity;
 - b) recommended that all new letter boxes should adopt a 3-way letter box design (incorporating a key for Pigeonhole access and a key for aperture access ("**Aperture Masterdoor Keys**")); and
 - c) encouraged letter box owners to provide PSOs with the Aperture Masterdoor Keys, to facilitate their delivery of mail items directly to the letter boxes.
- 2.14 IDA received several different comments on this issue:
- (a) One Respondent highlighted that access to letter boxes was critical, and asked IDA to revamp the entire letter box system to either:
 - (i) Prohibit the locking of apertures by residents altogether and step in to directly regulate the sending of junk mail; or

- (ii) Prohibit access to the Pigeonholes by SingPost, prohibit 3-way letter boxes and stipulate a timeframe for replacement of all letter boxes with letter boxes which would allow full access by all PSOs.
 - (b) Another Respondent expressed serious concerns about handing over Aperture Masterdoor Keys to PSOs, and asked IDA to devise a solution to address the potential problems of: (a) an increase in junk mail; (b) security issues; and (c) difficulty in tracing the accountability for any damage when more than one PSO has access to letter boxes. In addition, the Respondent felt that the decision to allow access to the Aperture Masterdoor Keys should be monitored by IDA or SingPost.
 - (c) A third Respondent noted IDA's recommendation for the implementation of 3-way letter boxes, but felt that a mere recommendation was insufficient and might not be complied with.
- 2.15 IDA would like to highlight that the proposed amendments to the Guidelines are in line with the decisions taken by IDA on the issue of letter box masterdoor keys and letter box access during the Postal Liberalisation exercise in 2007¹, and also during the drafting of the Postal Competition Code and Postal Services Operations Code in 2008². IDA had taken these decisions only after an extensive public consultation process and taking into consideration the policy objectives, the various constraints and alternatives.
- 2.16 The concerns raised above by the first Respondent on letter box access are similar to those that were raised in previous consultation exercises and which IDA had already considered. For example, in the Postal Liberalisation exercise, IDA had considered a proposal to remove the lockable aperture feature in letter boxes, but IDA had pointed out that most residents welcomed the ability to lock their letter box apertures and would not want to revert to the open aperture design. IDA had also considered the possibility of retrofitting all existing letter boxes with 3-way masterdoors to allow for full access by all PSOs while still allowing residents to lock their apertures, but the cost of this option did not commensurate with the estimated benefit of market liberalisation. In addition, then as now, respondents had raised concerns over mail integrity and security if multiple operators were to be given access to the letter box masterdoor keys. After considering the policy objectives, the various constraints and alternatives carefully, IDA had decided not to allow every PSO access to the Pigeonhole Masterdoor Keys in the interest of maintaining the security and integrity of the public postal system. Only the designated Public Postal Licensee, SingPost, will have access to the Pigeonhole Masterdoor Keys to fulfill its Universal Service

¹ See IDA's Decision and Explanatory Memorandum on the Framework for Further Liberalisation of the Postal Services Sector in Singapore, at:

<http://www.ida.gov.sg/Policies%20and%20Regulation/20061006123617.aspx>.

² See IDA's Cover Note on Postal Competition Code and Postal Services Operations Code, at: <http://www.ida.gov.sg/Policies%20and%20Regulation/20070920113721.aspx#decision>.

Obligations. To facilitate access to the letter boxes by other competing PSOs, IDA required SingPost to provide downstream delivery service at regulated prices to the PSOs. IDA notes that most of the PSOs have since taken SingPost's Reference Access Offer, or concluded customised access agreements with SingPost, for delivery of mail to letter boxes.

- 2.17 The concerns and constraints considered during the previous consultation exercises in 2007 and 2008 continue to apply today. The Respondent in the current review has not submitted any new information to warrant a review of the letter box access framework.
- 2.18 IDA had also encouraged the developer, owner, managing agent or town council to allow other PSOs access to the Aperture Masterdoor Keys to facilitate their delivery of mail to the residents. In response to the second Respondent's comment that IDA or SingPost should control or monitor the handing over of Aperture Masterdoor Keys to other PSOs, IDA believes that it is operationally more practical for individual property owners and managing agents to administer the issuance of the letter box keys for the properties/areas under their care. IDA would not be able to keep up-to-date on developments in the individual properties across the island, such as letter box upgrading or property re-development, which would affect the issuance and availability of such keys. Nevertheless, IDA understands the concerns. IDA will work with PSOs who wish to obtain Aperture Masterdoor Keys to devise a system to ensure that these keys are not duplicated and no unsolicited mail is delivered to residents. IDA will also share with developers, owners, managing agents and town councils a set of practices, which they may choose to adopt, for the management of Aperture Masterdoor Keys.
- 2.19 IDA has reviewed, and agrees with the concern that simply *recommending* the implementation of the 3-way letter box designs may be insufficient to meet our policy goals. Therefore, to facilitate access to letter boxes, the Guidelines will now *require* building developers to ensure that all new, upgraded or replacement letter boxes adopt the 3-way letter box design if they wish to include the lockable aperture feature.

Self-Locking Apertures

- 2.20 One Respondent asked IDA to ensure that masterdoor keys do not have the ability to lock aperture covers that had been left unlocked by residents. The Respondent had suggested that some letter boxes have design flaws and the masterdoor key could automatically lock apertures, even if they had been left unlocked by the resident.
- 2.21 IDA has conducted an investigation and found no evidence that such letter boxes exist. However, IDA would believe that such design flaws, if they exist, would not

be welcomed by either residents or PSOs. As such, letter box developers should ensure that they do not incorporate any letter boxes with such a design flaw.

“For Returned Mail Only” Boxes

- 2.22 One Respondent had suggested highlighting the recommended locations of the “For Returned Mail Only” boxes in the relevant letter box diagrams.
- 2.23 IDA agrees that this is a worthwhile clarification and has incorporated these amendments into the Guidelines.

Letter Boxes in Secured Premises

- 2.24 IDA received two comments in relation to letter boxes located within secured premises:
- (a) One Respondent suggested that all PSOs be given “free and unencumbered access” to secured premises to allow mail delivery to letter boxes; and
 - (b) Another Respondent suggested that IDA require all owners of secured and gated communities to build their letter boxes at publicly accessible areas (possibly along the compound walls).
- 2.25 On the first suggestion, IDA cannot require property owner or management to grant PSOs unfettered access to any secured building premises. As with any third party seeking access to private properties, all PSOs should request permission from the property owners or management to enter the premises to deliver mail to residents, and cooperate with the property owners or management on the required security measures. IDA believes that it is unlikely that owners or managers of secured premises would deny PSOs entry into their compounds to deliver letters to the residents. Nevertheless, IDA would urge all owners or managers of secured premises to grant reasonable access to PSOs, in order to allow them to deliver mail items to the residents.
- 2.26 On the second suggestion, the Guidelines have already recommended that: “[w]ith enhanced security at many premises, it will be ideal if the Postman can sort the mail into the letter boxes without having to enter the secured areas. The letter boxes nest can be installed along the boundary or wall structure”. However, this is only a recommendation as it may not be reasonable to mandate that all letter boxes *must* be located along the walls of a gated building. While IDA notes the Respondent’s concern, this concern must also be balanced against the security and design requirements of building developers and property managers. For large compounds, the residents might also be inconvenienced if letter boxes are located along the outer walls of the compounds.

3. CONCLUSION

- 3.1 The Guidelines will be implemented with immediate effect. All developers, owners and managing agents of residential, commercial or industrial buildings should take note of the new requirements and ensure that, going forward, they conform to the design and installation requirements laid out therein.