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Mr Andrew Haire
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BY FAX (6211 2116) & HAND


Dear Sir,

**SINGAPORE POST LIMITED'S RESPONSE TO IDA'S PUBLIC CONSULTATION ON
THE PROPOSED AMENDMENTS TO LETTERBOX SPECIFICATIONS AND
GUIDELINES ISSUED ON 2 JANUARY 2009**

Singapore Post Limited ("SingPost") is pleased to submit our response to IDA's Public Consultation on the Proposed Amendments to Letterbox Specifications and Guidelines issued on 2 January 2009.

We shall be available for further clarification if necessary.

Yours sincerely


Celine Ho (Mrs)
Senior Vice-President
Regulatory Affairs & Corporate Administration

Enc.



SINGAPORE POST LIMITED

**SUBMISSION TO
THE INFOCOMM DEVELOPMENT AUTHORITY OF SINGAPORE ("IDA")**

**PUBLIC CONSULTATION ON
THE PROPOSED AMENDMENTS TO LETTERBOX SPECIFICATIONS AND GUIDELINES
ISSUED ON 2 JANUARY 2009**

2 FEBRUARY 2009

**SUBMISSION BY SINGAPORE POST LIMITED IN RESPONSE TO THE PUBLIC
CONSULTATION ON THE PROPOSED AMENDMENT TO LETTERBOX
SPECIFICATIONS AND GUIDELINES**

- 1 SingPost welcomes the opportunity to submit our response to the consultation paper issued by IDA on 2 January 2009 in relation to the proposed amendments to the current Letterbox Specifications and Guidelines ("**Letterbox Guidelines**").
- 2 Upon liberalisation of the basic letter services market on 1 April 2007, and in a multiple-operator environment, SingPost, as the designated Public Postal Licensee ("**PPL**"), has been authorised by IDA to continue with the administration of the specifications and guidelines for the purpose of ensuring that developers of residential, commercial and industrial properties conform to the design and installation of letterboxes in Singapore. In addition, SingPost will also hold the full set of letterbox master door keys to facilitate our performance of the Universal Service Obligation ("**USO**"). SingPost is committed to discharging this responsibility to the best of our ability.
- 3 SingPost agrees with IDA that in a multi-operator environment, the issue of mail integrity and security cannot be completely addressed despite stringent and detailed regulations.¹
- 4 Therefore, in the interest of mail security and integrity in the public postal system, and to safeguard consumers' interests, IDA had decided that it will allow only the designated PPL to have access to the masterdoor keys that reveal the letterbox pigeonholes ("**Pigeonhole Masterdoor Keys**"). This will include letterbox pigeonholes for both residential and commercial letterboxes. Following the same principle, this will also apply to certain letterbox pigeonholes which are housed in a storage area, where the access to these letterbox pigeonholes are only through the locked door of the room instead of the masterdoor.
- 5 IDA's proposed revised Section 3.8 on "Pigeonhole Masterdoor Keys, Aperture Masterkeys and Aperture Masterdoor Keys" reads:

"...It is recommended that all Pigeonhole Masterdoor Keys be handed to SingPost upon completion of the letter box installation. If the Developer or the appointed Managing Agent wishes to retain duplicates of the keys, the Developer

¹ Paragraph 2.2, IDA's Public Consultation on the Proposed Amendment to Letter Box Specifications and Guidelines, issued 2 January 2009

or his appointed Managing Agent should inform SingPost in writing. Under such circumstances, SingPost should be absolved of any sole liability should there be mail violation..."

- 6 SingPost notes that IDA had recommended that the Developers / appointed Managing Agents should hand over the Pigeonhole Masterdoor Keys to SingPost only in order to ensure that only one postal licensee would be held accountable for the security and integrity of the mail. On the assumption that only SingPost possesses these Pigeonhole Masterdoor Keys, *"then it would be clear that any other third parties possessing such keys would have obtained it improperly. This could then be treated as a case of theft, an offence punishable under the Penal Code, and will be referred to the Police for investigation."*²
- 7 Because the improper or unauthorised possession, retention and control of such keys may compromise mail security and integrity, SingPost is concerned about how this will be enforced in practice. There is a real and distinct possibility that not all such keys will be handed over to SingPost by the Developers / appointed Managing Agents upon the installation of the letterboxes as proposed by IDA. There is also presently no conclusive way of establishing and ascertaining whether the Developers / appointed Managing Agents have actually done so, and not retained any duplicate keys.
- 8 If it is discovered that duplicate keys have been retained by the Developers / appointed Managing Agents, or where it is discovered that such duplicate keys have been improperly furnished to some other third parties (including the unauthorised retention or copying of such duplicate keys by such third parties), that results in mail violation, there must be reasonable doubt as to SingPost's liability (if any) for such mail violation. To say that SingPost will be absolved of any sole liability in such cases is cold comfort, given that SingPost may be entirely blameless in such situations. Absolution of sole liability does not mean no liability in the eyes of the aggrieved party.
- 9 In this regard, SingPost proposes that the revised Section 3.8 ("Pigeonhole Masterdoor Keys") should read as follows:

"To ensure the security and integrity of the mail, only the designated Public Postal Licensee, SingPost, is allowed to have access to the Pigeonhole Masterdoor Keys. It is recommended that all Pigeonhole Masterdoor Keys be handed to SingPost upon completion of the letter box installation. If the Developer or the appointed Managing Agent wishes

² Paragraph 15, IDA's Explanatory Memorandum on the Postal Services Regulations issued on 2 May 2008

to retain duplicates of the keys, the Developer or his appointed Managing Agent should inform SingPost in writing. Under such circumstances, SingPost should be absolved of any ~~sole~~ liability should there be mail violation..."

(Proposed deletion as marked)

- 10 In this submission, SingPost does not propose to make any major changes to the proposed Letterbox Guidelines. SingPost concurs that the proposed changes are generally minor and mostly operational in nature, in order to fine-tune and reflect certain operational concerns and specifications in addition to providing further clarity to the existing guidelines. Some of the changes include specifying the minimum letterbox nest dimensions to facilitate easy mail delivery by the postman and mail retrieval by the occupants, clarifying the minimum height of the base of the letterbox nest to provide comfort for occupants when retrieving their mail and to clarify the need for spare letterboxes and the location of such spare letterboxes.
- 11 For the avoidance of doubt, the changes proposed shall apply to letterboxes that are to be installed or upgraded in the future and that existing letterboxes need not be modified to meet the new proposed requirements.
- 12 SingPost's additional proposed amendments are set out as follows:

12.1 **Proposed amendments to revised paragraph 1.3 ("Developer Responsibility")**

"...The Postal Service Operators licensed by IDA, including the designated Public Postal Licensee, SingPost, **shall** only use **the letterboxes for the purpose of** mail delivery to the occupants of the building. However, if it is established that the damage to the **common pigeonhole masterdoor** ~~letter box (including the common masterdoor, if applicable)~~ is due to the Postman's negligence or carelessness, the relevant Postal Service Operator shall repair the masterdoor."

(Proposed amendments as marked in bold, deleted and italics)

- 12.1.1 SingPost submits that it is more likely for the pigeonhole masterdoor to be damaged (if at all) given reasonable wear and tear, than for the letterbox per se to be damaged.

12.1.2 SingPost also submits that in the general interest of keeping and maintaining the letterboxes in a good and secure condition, owners of the property and/or managing agents should also be responsible for the general maintenance, upkeep and repair of the letterboxes.

12.2 **Proposed amendments to revised paragraph 3.6 ("For Returned Mail Only")**

12.2.1 For further clarity on the location of the "For Returned Mail Only" boxes, SingPost has also inserted the recommended position of the "For Returned Mail Only" boxes in the respective drawings as attached in **Schedule 1**. SingPost is proposing amendments to the existing Annexes, namely, Annex 2, Annex 3, Annex 4, Annex 5, Annex 10, Annex 11(1/4), Annex 11(2/4), Annex 11(3/4) and Annex 11 (4/4) to reflect this accordingly. (See Schedule 1)

12.3 **Proposed amendments to revised paragraph 6 ("Enhanced Security")**

"With 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, in order to facilitate mail delivery, free and unencumbered access should be given to the Postman in relation to letterboxes which are installed within secured areas of the premises. Any security access device(s) should be provided and replaced at no cost to the Postman nor Postal Services Operator, given fair wear and tear."

(Proposed insertions in bold and italics)

12.3.1 SingPost submits that this paragraph be inserted into the revised paragraph 6 in order to facilitate and provide unencumbered and unfettered access to letterboxes situated in premises with enhanced security for the Postman, for example, in recently-built condominiums, office buildings and buildings with recent retrofitting and/or upgrading works done.

Schedule 1

Proposed amendments to the existing Annexes:

Annex 2

Annex 3

Annex 4

Annex 5

Annex 10

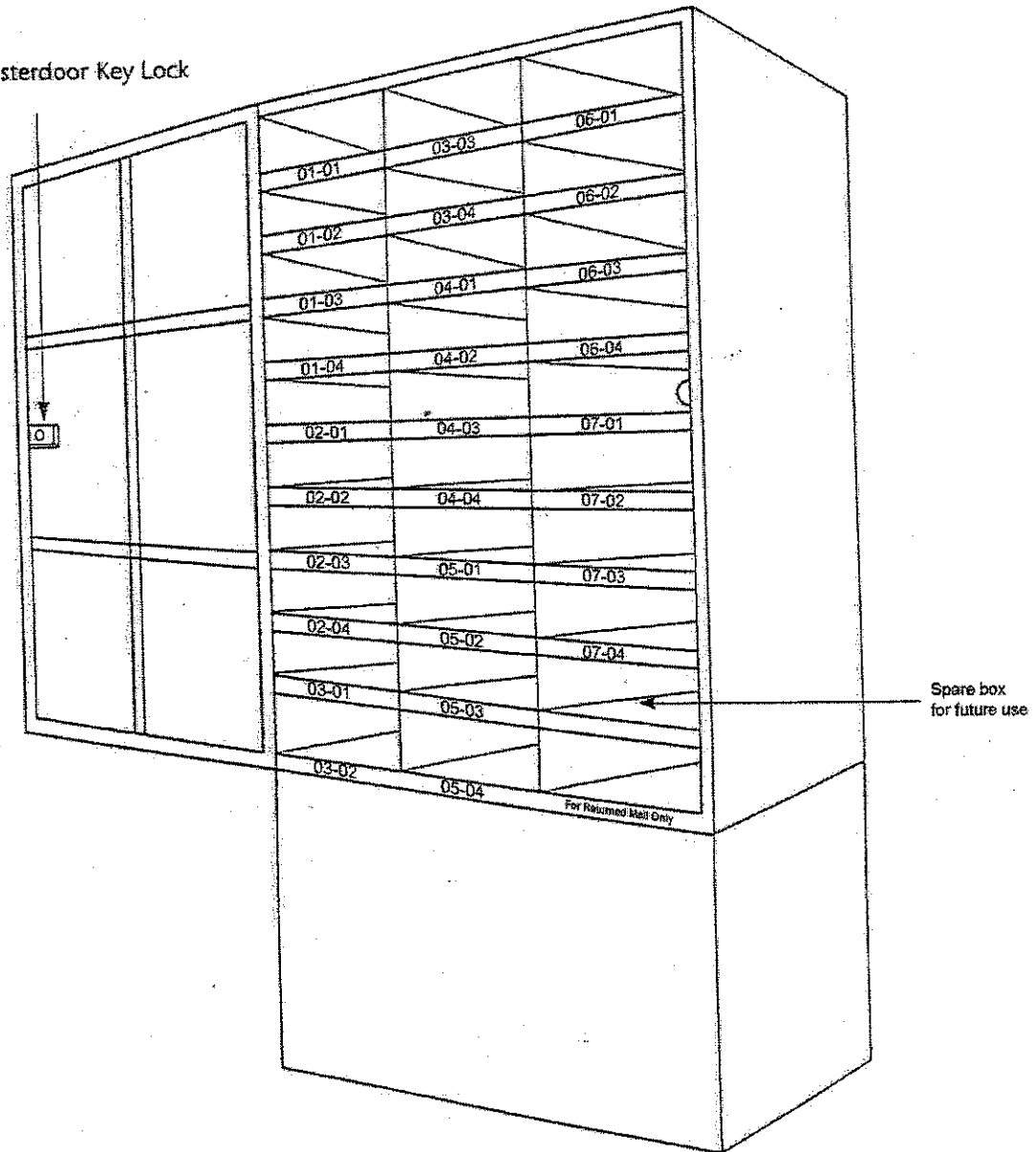
Annex 11 (1/4)

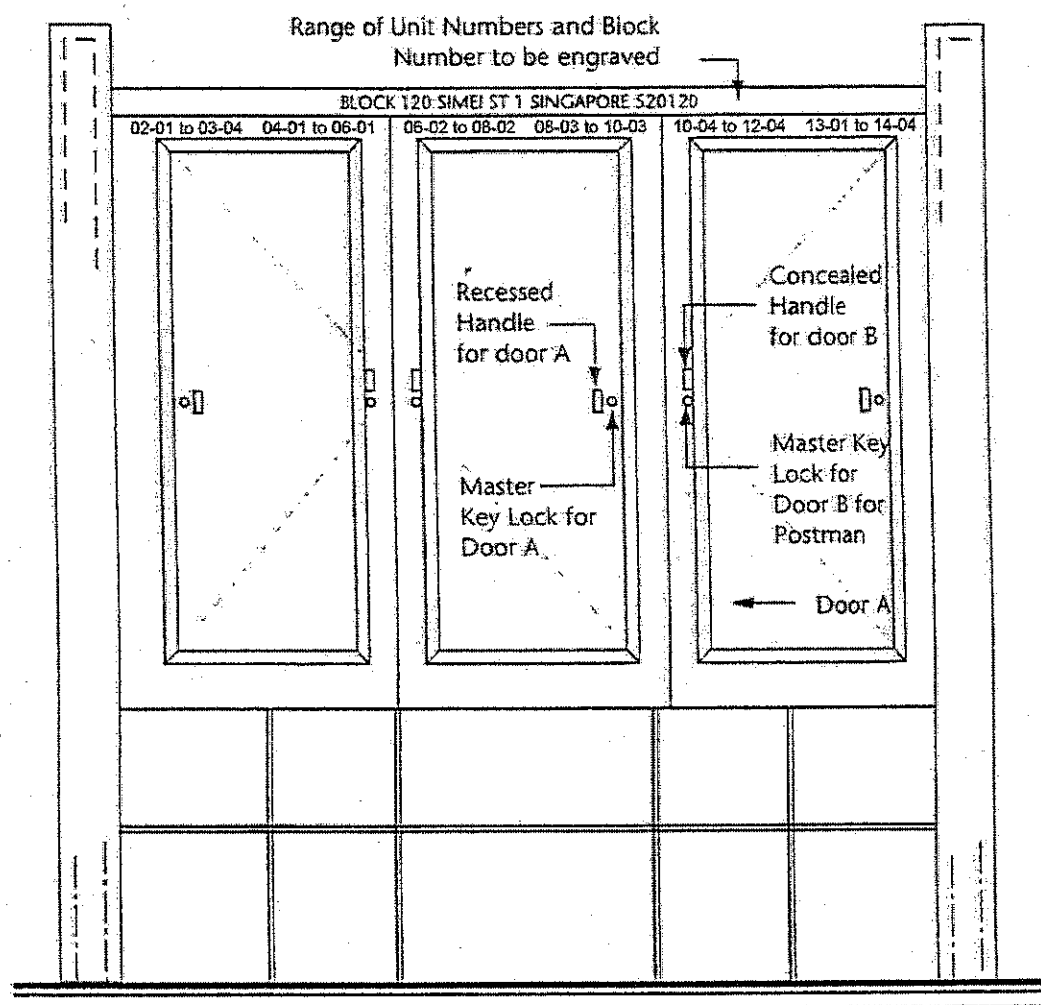
Annex 11 (2/4)

Annex 11 (3/4)

Annex 11 (4/4)

Masterdoor Key Lock





Numbering Sequence

The unit numbers for different buildings within an estate should be non-repeating and arranged in proper running order. For nest of letterboxes, they are to be numbered in ascending sequential order (from Postman's view)

- from top-to-bottom, and
- from left-to-right as follows:-

Front Sorting Nest of Letterbox

01-01	02-03	04-01	05-03	07-01
01-02	02-04	04-02	05-04	07-02
01-03	03-01	04-03	06-01	07-03
01-04	03-02	04-04	06-02	07-04
02-01	03-03	05-01	06-03	←
02-02	03-04	05-02	06-04	For Returned Mail Only

Spare box
for future use

FRONT (POSTMAN'S) VIEW

01-01	02-03	04-01	05-03	07-01
01-02	02-04	04-02	05-04	07-02
01-03	03-01	04-03	06-01	07-03
01-04	03-02	04-04	06-02	07-04
02-01	03-03	05-01	06-03	←
02-02	03-04	05-02	06-04	For Returned Mail Only

Spare box
for future use

FRONT (USER'S) VIEW

Rear Sorting Nest Of Letterbox

Unit numbers within an estate should be in running order and non-repeating. For nest letterboxes with sortation of mail by postman from the rear masterdoor, the letterboxes are to be numbered in sequential order at the rear of the letter boxes (from Postman's view) as follows:-

01-01	02-03	04-01	05-03	07-01
01-02	02-04	04-02	05-04	07-02
01-03	03-01	04-03	06-01	07-03
01-04	03-02	04-04	06-02	07-04
02-01	03-03	05-01	06-03	
02-02	03-04	05-02	06-04	For Returned Mail Only

Spare box
for future use

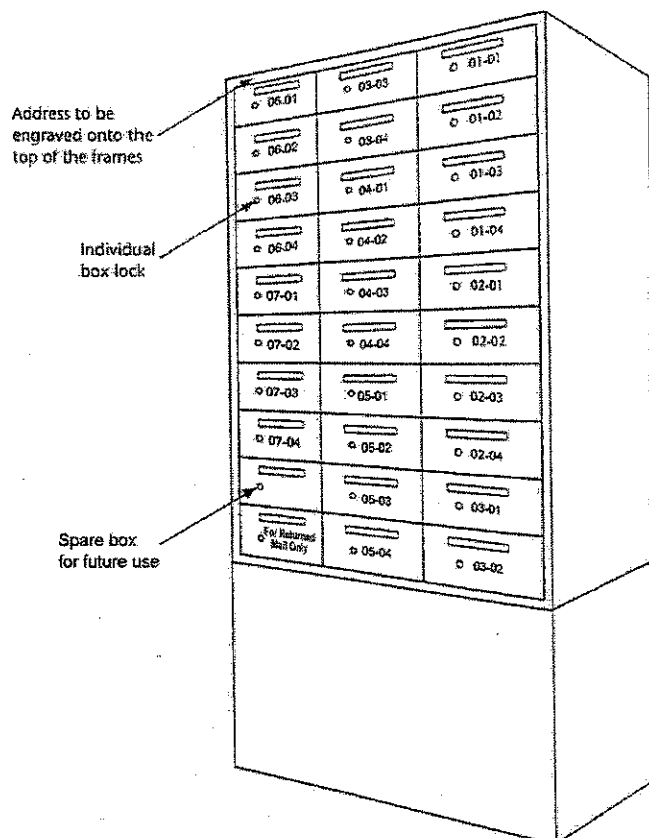
REAR (POSTMAN'S) VIEW

The numbering of the letterbox door as seen by the tenant will be as follows:-

07-01	05-03	04-01	02-03	01-01
07-02	05-04	04-02	02-04	01-02
07-03	06-01	04-03	03-01	01-03
07-04	06-02	04-04	03-02	01-04
	06-03	05-01	03-03	02-01
For Returned Mail Only	06-04	05-02	03-04	02-02

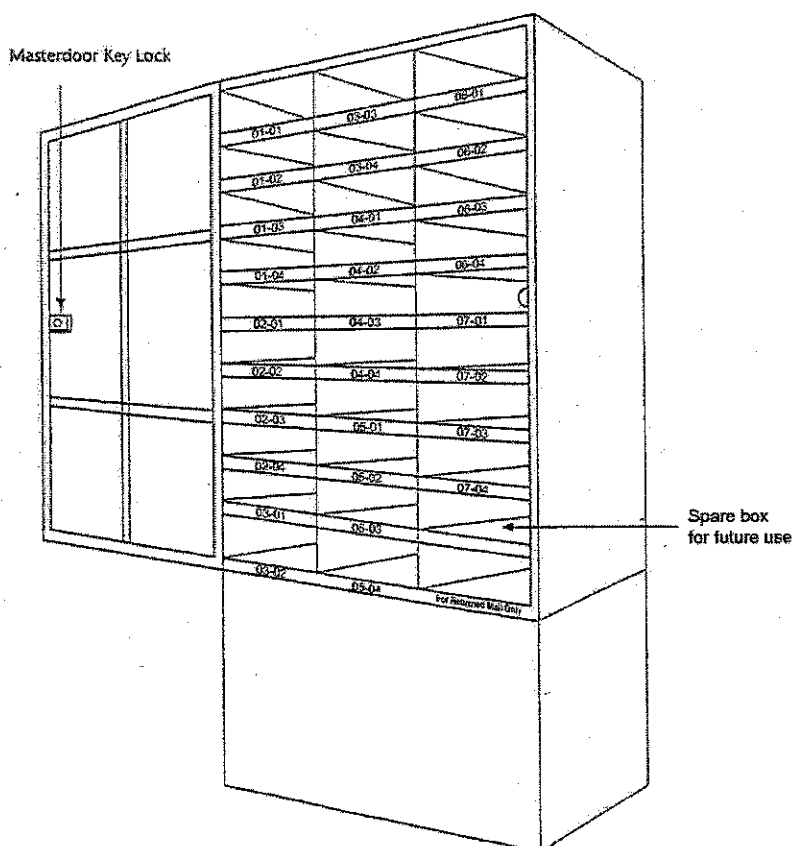
Spare box
for future use

FRONT (USER'S) VIEW



FRONT (USER'S) VIEW

NOTE : The numbering sequence is the "mirror" image of postman.

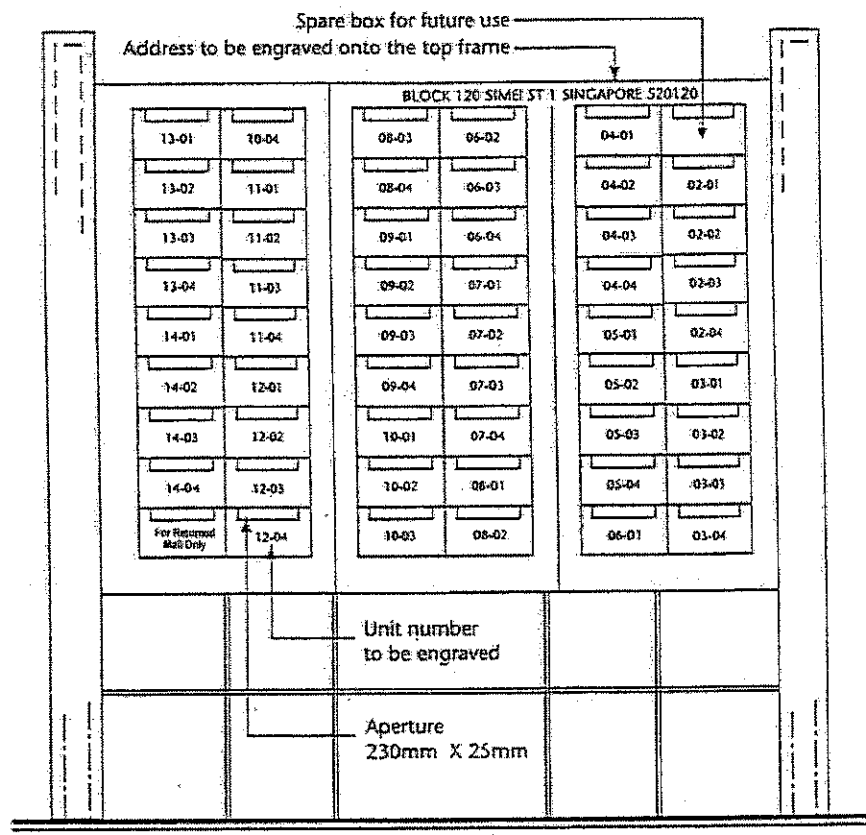


REAR (POSTMAN'S) VIEW

NOTE: The ascending numbering sequence is from top-to-bottom and from left-to-right order.

3-Way Masterdoor

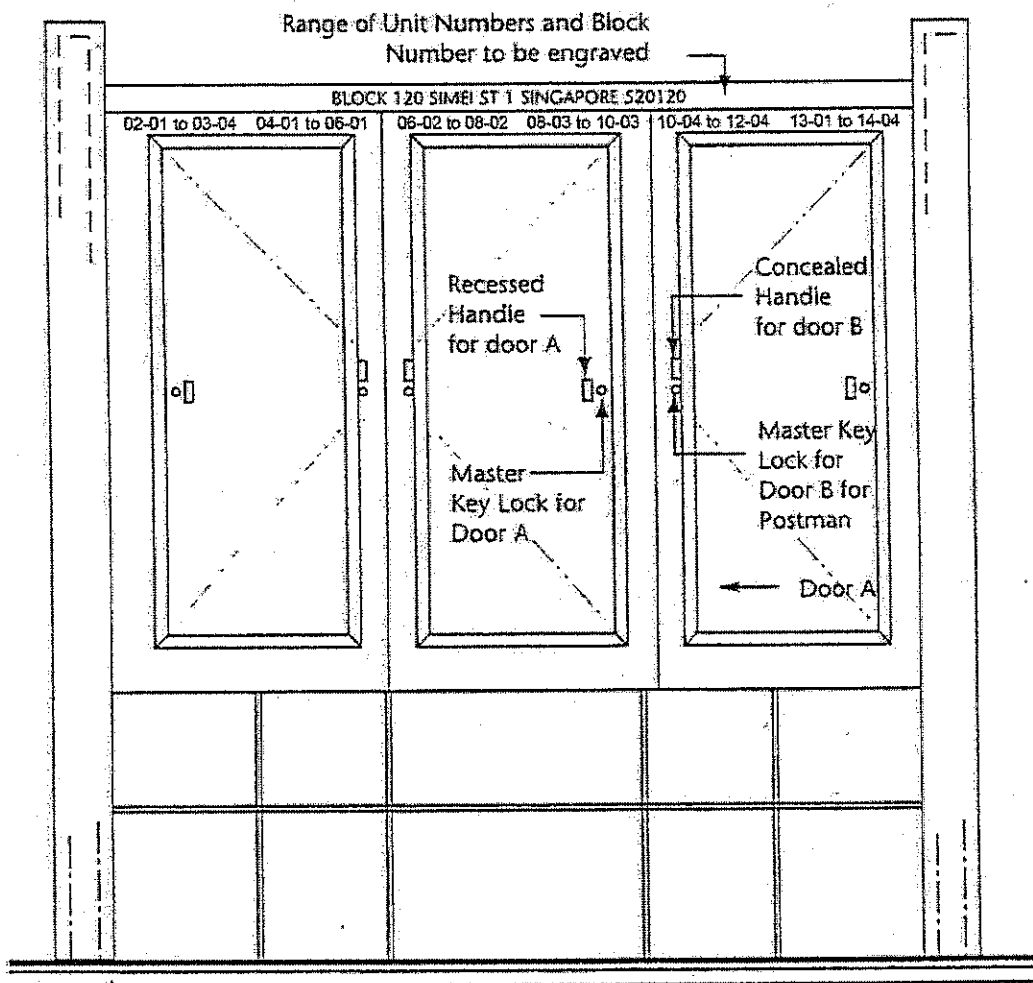
Rear Sorting Model



FRONT (USER'S) VIEW

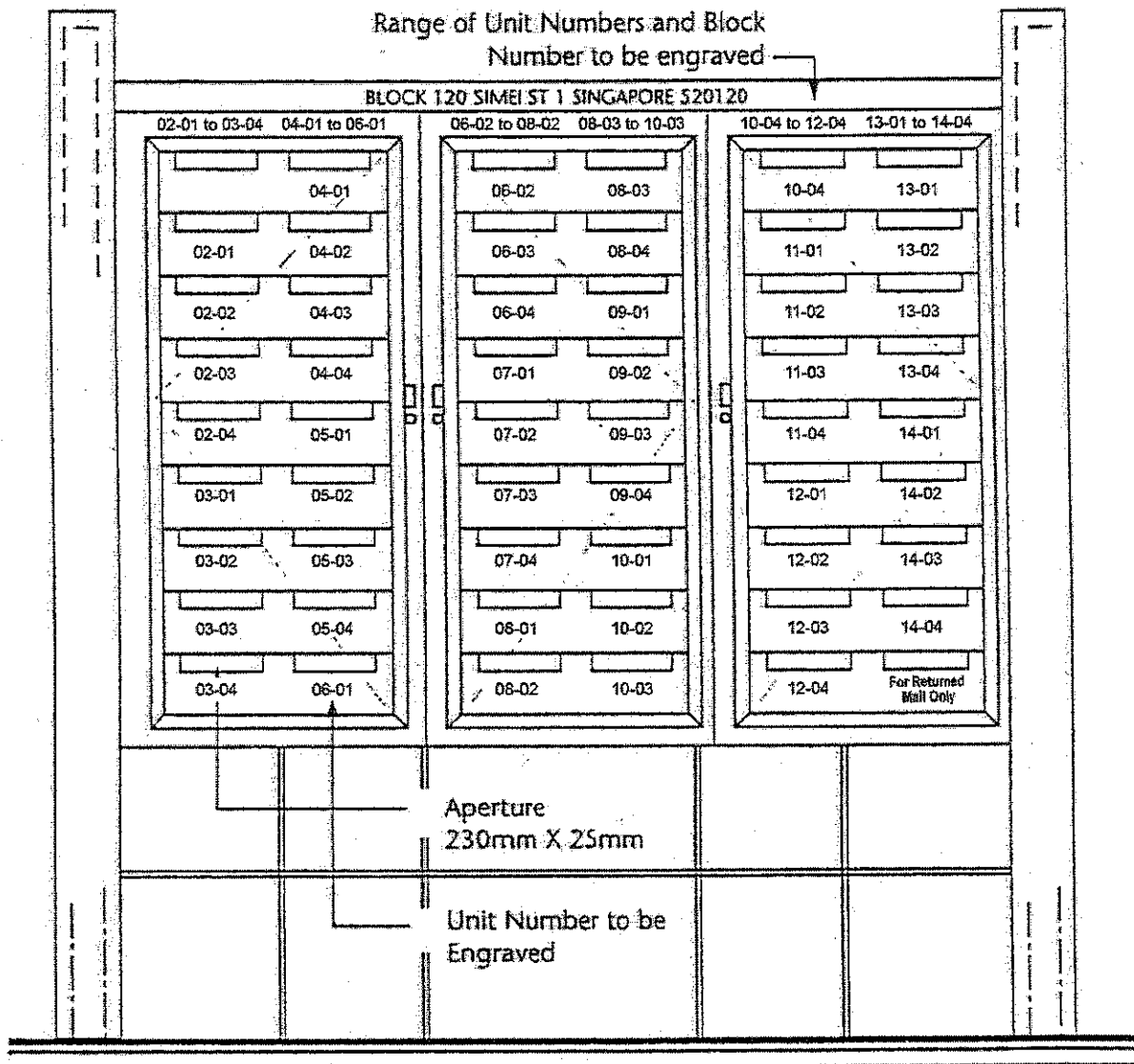
NOTE : The numbering sequence is the "mirror" image of postman.

3-Way Masterdoor



REAR VIEW WITH DOORS CLOSED

3-Way Masterdoor



REAR VIEW WITH DOOR "A" OPEN

NOTE: The numbering sequence is from top-to-bottom from left-to-right order.

