

## MCI PostalRegulation (MCI)

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**From:** Hong Tan <hongtan@singnet.com.sg>  
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**To:** MCI PostalRegulation (MCI)  
**Subject:** Parcel Lockers

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I refer to the proposed changes to the Postal Services Act to allow IMDA to spell out offences, enforce the new rules and require building owners and developers to provide space for the lockers, among other things.

The Postal Service Act should set out the framework for the development and operation of a network of delivery points within 250m of residents' home. It should not be limited to the laws, regulations and policies governing the operation of parcel lockers only. It should allow the development other more innovative solutions besides parcel lockers.

I am sure IMDA is aware that the electronic parcel lockers were piloted at a few condominiums in Singapore 20 years ago. It did not take off. This was reported in The Straits Times. Why? Besides the lack of enabling communication technologies and commercial viability, the public was not ready then.

There is no doubt that with the exponential growth in e-commerce, there is a need to develop the last-mile parcel delivery infrastructure. The problem statement is to find practical and commercially viable solutions to provide delivery points within 250m of residents' home.

This could be a network of delivery points such as 1) unmanned lockers, 2) concierge service counters and/or 3) shops in HDB heartland. The network of delivery points is supported by an integrated communication, logistic and business platform software application.

### 1. Self-Operated Locker Solution

The two major concerns of Self-Operated Locker solution are:

i) **Critical Security Risk**

What could prevent a determined person from depositing hazardous and explosive materials in an unmanned self-operated locker?

ii) **Commercial Viability**

The self-operated locker solution is a rigid infrastructure that cannot adapt to any e-commerce products and cater to users in all age groups. Its adoption rate is likely to be slow among the pre-generation Z residents.

### 2. Concierge Service Counter Solution

A concierge service counter at a HDB block can overcome the practical issues associated with home delivery and reduce the cost, time and inconvenience of home delivery services. It manages and administers the delivery, storage and goods return collection point for e-commerce vendors.

The service counter can serve as a community information and service centre for resident.

An integrated of concierge service counters should be linked to an agile cloud based platform that provides digitalised accounting, administrative and operational applications for managing online orders and fulfilment including tracking, communication, document management and transactions.

The main advantages of the concierge service counter solution are

- i) **Thousands of Jobs Created**  
It provides much needed employment opportunities for older PMETs, PWDs and homemakers living in the housing block or in the vicinity.
- ii) **Revival of Kampong Spirit**  
The service counter is a convenient meeting point for residents to engage, share and interact casually. It revives the kampong spirit where residents know one another well and create a safer environment.
- iii) **Flexibility and Scalability**  
The concierge service counter solution is scalable to meet changes in market demand and flexible to adapt to a wider range of products to be delivered.

### 3. Shops at HDB Heartland

Shops at HDB heartland can be contracted to be last-mile delivery points for e-commerce parcels where residents can collect their parcel at the shop or have it delivered to his home for a service fee.

The main advantages of using shops as delivery points are:

- i) **A Source of Revenue for Shop Owners**  
It is an additional source of revenue for shop owners. It is also an opportunity for shop owners to establish relationship with potential customers and promote its products and services.
- ii) **Flexibility and Scalability**  
It is scalable to meet changes in market demand and flexible to adapt to a wider range of products to be delivered. The delivery points can also be used as a collection points for recycling programmes.

We should not be blindsided by the current craze for digital and AI solutions that are ahead of social and political development. In the implementation of the parcel locker solution, IMDA should require operators, including SingPost, to set up a dedicated customer service team to support the pre-Generation Z residents.

This are just my personal observations as a user of delivery services.

Best Regards

Lim Hong Tan