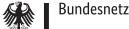
**RESPONSIBILITY FOR RATES REGULATION AND SPECIAL** CONTROL OF ANTI-COMPETITIVE PRACTICES IN POSTAL SERVECES, NETWORK ACCESS ACCOUNTING

# Report

Comparison of letter prices in Europe 2023



Bundesnetzagentur

# Comparison of letter prices in Europe 2023

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#### 2 | BUNDESNETZAGENTUR

## Federal Network Agency

Ruling Chamber 5 Tulpenfeld 4 53113 Bonn Germany Tel: +49 (0)228 14-0 Fax: +49 (0)228 14-8872 Email: info@bnetza.de

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## 1 Introduction

The Bundesnetzagentur published its first comparison of letter prices in the personal customer segment in 2018. The price comparison only includes the products offered by universal service providers in other European countries that are comparable with the products offered by Deutsche Post AG. In accordance with section 1(1) para 1 of the German Postal Universal Service Ordinance (*Post-Universaldienstleistungsverordnung* – PUDLV) in conjunction with section 4 para 2 of the German Postal Act (*Postgesetz* – PostG), universal services in the letters sector cover letters with a maximum weight of 2,000 grams and sizes as specified for the different letter products in the Universal Postal Convention.

Up until March 2021, the German Postal Rates Regulation Ordinance (*Post-Entgeltregulierungsverordnung* – PEntgV) included a provision allowing prices of other companies to be taken into account when approving rates: "In other respects the regulatory authority may, for purposes of comparison, refer to the prices of companies offering like services in comparable competitive markets. Any special features of the reference markets shall be taken into account" (section 3(3) sentences 2 and 3 PEntgV (old version)). This provision provided the Bundesnetzagentur with an opportunity to make a regular comparison of the letter prices in Europe. Although the ordinance no longer contains this provision, the Bundesnetzagentur believes it still makes sense to publish an independent comparison of letter prices in Europe and make the relevant data/information available to third parties.

Each comparison published presents the criteria for selecting the countries, the data used and the findings. The comparison covers prices payable by personal customers without any special rates (such as volume discounts). The Bundesnetzagentur publishes a separate report on rates for bulk mailers and consolidators.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Available at: https://www.bundesnetzagentur.de/DE/Fachthemen/Post/Teilleistungen/start.html (in German).

## 2 Methodology

The first step in the price comparison was to select the countries to be included. The data used by the Bundesnetzagentur for the individual countries considered were taken from publicly accessible sources such as Eurostat and from online publications (such as annual reports) from the postal companies providing universal services in their country.

The next step was to identify the relevant comparable products using criteria including weight and delivery speed to select the products largely matching Deutsche Post AG's products.

The letter prices in countries not belonging to the euro area were converted into euros using the foreign exchange reference rates published by the European Central Bank (ECB) for 2 January 2023.<sup>2</sup>

The comparisons are based on real prices. The real price was calculated by taking the nominal letter price minus the inflation rate from the year 2022. The nominal price of a product or service describes the actual price in monetary terms, whereas the real price reflects adjustment for inflation. The Harmonised Indices of Consumer Prices (HICPs) published by Eurostat were used for the inflation rates for the individual countries.<sup>3</sup> In countries where tax is payable on letter prices (such as Denmark), the tax was also taken into account and the nominal price was not reduced by the amount of the tax, in order to make the retail prices comparable.

<sup>&</sup>lt;sup>2</sup> Publication of the reference rates by 16:00 CET on working days:

https://www.ecb.europa.eu/stats/shared/pdf/eurofxref.pdf?1a7ccd4ab5185ff0021b6b254d70e570.

 $<sup>^{3}\</sup> https://ec.europa.eu/eurostat/databrowser/view/tec00118/settings_1/table?lang=en/setting$ 

## 3 Selection of the comparison countries

The selection of the 30 European countries included in the comparison is based on the comparability of the markets and on any special features in the countries' markets that need to be taken into account.

## 3.1 Comparable markets

In principle, all postal operators in the letters markets that provide services for personal customers are comparable in the first instance with Deutsche Post AG. As a rule, letter-post items from personal customers are collected and delivered in other European countries by the universal service providers. Competitors are usually active in the business customer segment and are therefore not included in the comparison. Only the universal service providers are considered for the comparison group.

In addition, the legal framework in the countries should be comparable with that in Germany. All EU Member States meet this criterion as they are subject to the Postal Services Directive.<sup>4</sup> This also applies to some EFTA Member States such as Norway and Switzerland.<sup>5</sup> The EFTA Member States were therefore also included in order to obtain as broad a picture as possible. The data used to compile this report were collected on 4 January 2022.

The German lawmakers introduced an additional comparison group with section 20(2) PostG: to calculate an appropriate profit mark-up, account must be taken in particular of the profit margins of those companies that are comparable in structural terms with the applicant company and are active in other European countries in markets comparable with the licensed sector. The comparison should be based on those companies whose risks are comparable with those of the regulated company. In accordance with section 5 PostG, the licensed sector covers all letter-post items with a maximum individual weight of 1,000 grams. A study of the structural comparability of companies is not part of this report. A further distinction is made in the analysis between listed and unlisted companies in the comparison group.

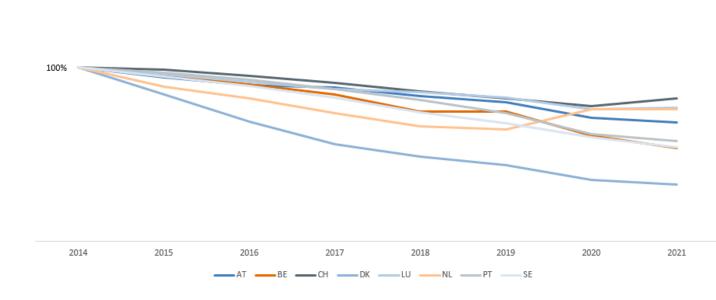
<sup>&</sup>lt;sup>4</sup> Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service

<sup>&</sup>lt;sup>5</sup> EFTA: European Free Trade Association (Iceland, Liechtenstein, Norway and Switzerland)

### 3.2 Special features in the markets

The individual markets can each have various special features. For instance, some European markets are characterised by a higher degree of digitalisation than others.

It can be assumed that the main reasons for a change in volumes lie in the pricing for letter products and in the increasing digitalisation of communications between public institutions/companies and the general public/customers. The chart below shows the change in the volumes of letters handled by universal service providers in selected European countries from 2014 to 2021, with 2014 as the base year.



Volume of universal service providers in selected European countries 2014-2021 (%)

Figure 1: volumes of universal service providers in selected European countries

The chart includes those countries for which data for the universal service providers' volumes were available for the whole period from 2014 to 2021. It should be noted that the data provided on volumes differ between the universal service providers. For example, in some cases only total volumes are provided, while in other cases a distinction is made between addressed and non-addressed items. Another distinction made by service providers to differentiate between products is between priority and non-priority items. The trends in volumes shown for the universal service providers are based on the volumes of addressed items (Austria (AT), Switzerland (CH), the Netherlands (NL), Portugal (PT)). If no data on the volume of addressed items are available, the next best data (for example on the total volume) are used (Belgium (BE), Denmark (DK), Luxembourg (LU), Sweden (SE)).

Figure 1 shows a decline in letter volumes in all the countries. Volumes in Denmark and Belgium in 2021 were 68% and 47% respectively of the volumes in 2014. The figures presented support the theory put forward above that digitalisation is a contributing factor to the decline in the volume of traditional letters. In effect, the increasing spread of digital technology is permanently taking away volumes from the letters market. In Germany, the volume of addressed items handled by Deutsche Post AG decreased from 8,882bn in 2014

to 6,314bn in 2021.<sup>6</sup> This represents a decline of 29% for the letters segment. Compared with volumes in other countries, the decline in Deutsche Post AG's volumes is slow but steady.

The table in Annex 1 presents all the information on the letter volumes of the universal service providers in all the countries considered in this report for which complete information on volumes is available. The table shows the data on volumes published by the universal service providers for the period from 2014 to 2021. The table also shows the percentage change in volumes in this period and the items for which data on volumes were published (addressed/total/priority and non-priority).

It is presumed that delivery speeds in countries with less densely populated regions (such as Iceland) are slower because of the smaller volume of letters sent within/to these regions and because of the distance between the regions. If volumes of letters are small, delivery only becomes economically efficient when the total amount of letters makes distribution worthwhile.

Electronic forms of communication are leading to a decline in volumes, with the result that D+1 delivery (delivery on the next working day) is increasingly losing importance in the individual letters markets.

#### 3.3 Countries selected for comparison

A total of 30 countries were selected for the comparison group: all 27 EU Member States and the EFTA Member States Iceland, Norway and Switzerland. The EFTA Member State Liechtenstein and the United Kingdom (UK) were not included in the comparison because no data on inflation in these two countries were available to calculate the real price.

The comparison covered the following countries: Austria (AT), Belgium (BE), Bulgaria (BG), Switzerland (CH), Cyprus (CY), Czechia (CZ), Germany (DE), Denmark (DK), Estonia (EE), Spain (ES), Finland (FI), France (FR), Greece (GR), Croatia (HR), Hungary (HU), Ireland (IE), Italy (IT), Iceland (IS), Lithuania (LT), Luxembourg (LU), Latvia (LV), Malta (MT), the Netherlands (NL), Norway (NO), Poland (PL), Portugal (PT), Romania (RO), Sweden (SE), Slovenia (SL) and Slovakia (SK).

The universal service providers in the following countries are listed on the stock exchange: AT, BE, DE, IT, MT, NL and PT.

## 4 Selection of the products for comparison

One product comparable with each of Deutsche Post AG's letter products – standard, compact, large and maxi – offered by the universal service provider in each country was selected for the letter price comparison. The prices shown are the prices payable by personal customers at postal outlets and not, for instance, online.

Other countries have different criteria in terms of size, weight and delivery speed. For example, 19 countries do not have two separate products corresponding to Germany's standard (20 g) and compact (50 g) letters. In

<sup>&</sup>lt;sup>6</sup> See Deutsche Post DHL Group Statbooks on mail volumes, https://www.dpdhl.com/en/investors/ir-download-center.html.

some countries, the maximum weight for products comparable with a standard letter is 100 g, as in UK, CH and IE, or even much higher, as in EE (250 g) and PL (500 g).

Several countries (20), such as DK, ES and IT, have products with different delivery speeds. Most countries have a product with delivery on the next working day and an additional, less expensive product with slower delivery. However, the universal service providers do not give a 100% guarantee for D+1 delivery but promise a rate of at least 80% (as in IT and BG) to 95% (AT). There is no general distinction between D+1 and D+X delivery in Germany, but Deutsche Post AG quotes a D+1 delivery rate of more than 90%.<sup>7</sup>

Germany's standard letter product was compared with two different products because of the abovementioned distinction between delivery speeds: with the products with guaranteed delivery on the next working day (D+1), and with the less expensive comparable products (D+X). If a universal service provider does not even offer the quicker delivery speed (as in FI, IS, NO, PT, RO, SE), the provider was not included in the first comparison (D+1) for a standard letter.

By contrast, the focus with compact, large and maxi letters is on the less expensive comparable products. In the case of the compact letter, this is because in most of the comparison countries, the products corresponding to Deutsche Post AG's compact letter are classed as a standard letter product. In the case of large and maxi letters, it is because they generally account for a smaller proportion of the letter volume in the personal customer segment in terms of the universal service providers' total revenue from postal services.

 $<sup>^7\,</sup>https://www.deutschepost.de/de/q/qualitaet_gelb.html \# laufzeiten (in German)$ 

## 5 Conducting the comparisons

#### 5.1 Standard letter

The standard letter comparison was first based on the products with the faster usual delivery speeds. All the products included in the comparison either have guaranteed or, as with Deutsche Post AG, at least usual delivery on the next working day (D+1).<sup>8</sup>

The chart below shows the prices for a letter with D+1 delivery in the comparison countries as at 2 January 2023.

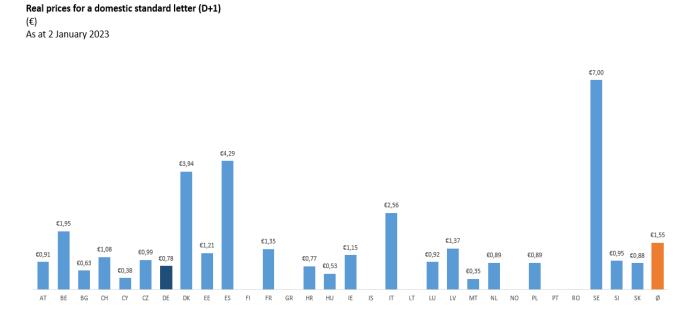


Figure 2: real prices for a domestic standard letter (D+1)

The prices for the products comparable with a standard letter with D+1 delivery in DK, ES and SE are outliers compared with the other countries. The prices –  $\in$  3.94,  $\in$  4.29 and  $\in$  7.00 – are much higher than the comparable prices in other countries. The average real price for a domestic standard letter for the comparison group is  $\in$  1.55.

<sup>&</sup>lt;sup>8</sup> FI, IS, NO, PT and RO do not have a standard letter product with guaranteed D+1 delivery. No reliable information for 2023 is available for GR and LT.

Some countries have a standard delivery speed in addition to D+1 delivery. The standard speed can differ from D+1. However, some providers (as in DE, IE, NL) do not make a distinction between different delivery speeds. The chart below shows the prices for D+X delivery.

#### Real prices for a domestic standard letter (D+X)



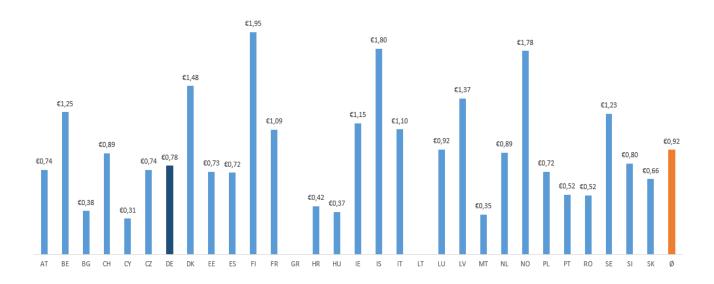


Figure 3: real prices for a domestic standard letter (D+X)

In contrast to the above-mentioned comparison for D+1 delivery, this comparison was based on the less expensive product (D+X) for personal customers in each country from the obvious viewpoint of affordability. This results in a lower average across all the comparison countries of  $\leq 0.92$ .<sup>9</sup>

The different products offered in the different countries could be a response to the coverage structure (such as population density, coverage area, volume and costs) and behaviour among personal customers (digital/physical mail). Countries with a high degree of digitalisation (such as DK and NL) or with predominantly rural structures have been adapting to the (changed) framework conditions in the postal sector for longer. In Denmark, for example, communication with authorities was transformed in 2014 with the introduction of the Public Digital Post Act.<sup>10</sup> Although next-day delivery (D+1) is not guaranteed in any of the comparison countries, it is likely. A less expensive product with a slightly slower delivery speed (D+2, D+3) is

 $<sup>^{9}</sup>$  No reliable information for 2023 is available for GR and LT.

<sup>&</sup>lt;sup>10</sup> See the 2020 international letter price comparison: Bundesnetzagentur - Internationaler Briefpreisvergleich (in German).

often offered in addition to D+1 delivery. Nevertheless, a D+X service may also provide delivery on the next working day.

In addition to the above comparisons with all the companies in the comparison groups, the groups can be broken down into listed and non-listed companies. The table below shows the average real prices for a standard letter for all the comparisons made.

### **Overview of averages**

	D+1 comparison		
	without	D+X comparison	
	FI,IS,NO,PT,RO		
Average for whole	£1.55	€0,92	
comparison group	€1,55		
Average for listet	61.04	60.00	
companies	€1,24	€0,80	
Average for non-	61.67	60.05	
listed companies	€1,67	€0,95	

Source: Bundesnetzagentur

Figure 4: average prices as at 2 January 2023

The listed companies' average prices are lower than the non-listed companies' prices in each case.

### 5.2 Compact letter

The comparison of compact letter prices, based on the less expensive products, shows a similar picture to the standard letter price comparison. This is illustrated in the chart below.

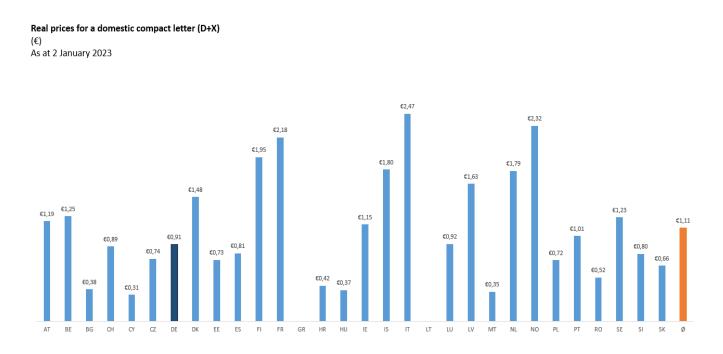


Figure 5: real prices for a domestic compact letter (D+X)

The prices in IT and NO are more than double the average of  $\leq 1.11$ .<sup>11</sup> The majority of countries (19) have a product comparable to Deutsche Post AG's compact letter with a maximum weight of 50 grams. The universal service providers in AT, CH, EE, FR, IE, LV, PL and PT allow a higher maximum weight. Deutsche Post AG's price of  $\leq 0.91$  is below the European average of  $\leq 1.11$ .

 $<sup>^{11}\,\</sup>rm No$  reliable information for 2023 is available for GR and LT.

#### 5.3 Large letter

The comparison of large letter prices shows a differentiated picture. The universal service providers in AT and CH are the only providers without a comparable product in this and the next higher weight category and are therefore not included in this comparison or in the comparison of prices for a maxi letter. The chart below shows the prices for a large letter and comparable products.

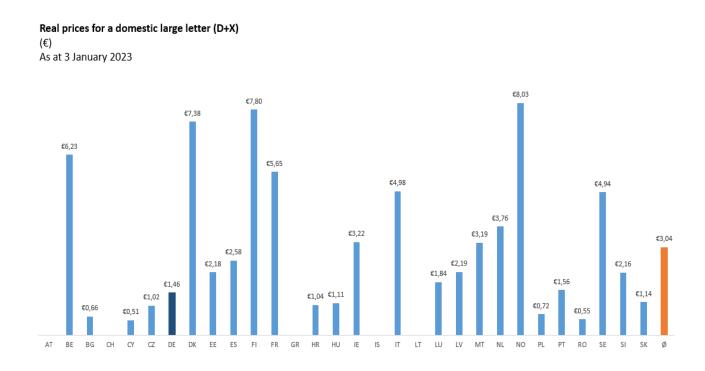


Figure 6: real prices for a domestic large letter (D+X)

It should be noted here that the comparable products in the countries with a very high price (BE, DK, FI, NO) have a higher maximum weight (up to 2 kg) than Deutsche Post AG's product (up to 500 g). The overall average is  $\in$  3.04,<sup>12</sup> thus the price for Deutsche Post AG's product of  $\notin$ 1.46 is 52% cheaper.

 $<sup>^{\</sup>rm 12}$  No reliable information for 2023 is available for GR and LT.

### 5.4 Maxi letters

Some countries (AT, CH and LT) do not actually have a letter product with a weight up to 1 kg and are therefore not included in the comparison. The chart below shows the results of the price comparison.

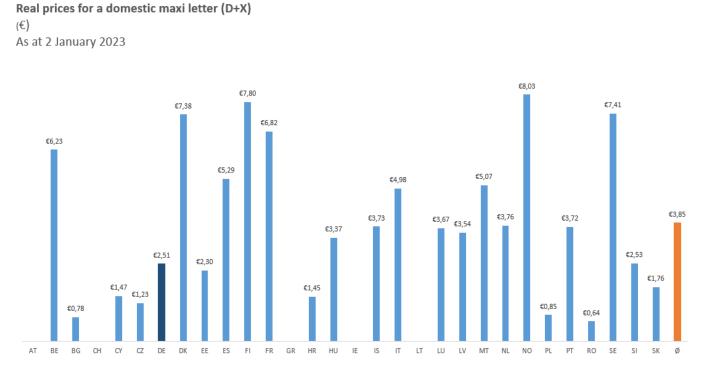


Figure 7: real prices for a domestic maxi letter (D+X)

A closer look at the prices for a maxi letter shows a wider variation from the real price for Deutsche Post AG's maxi letter ( $\leq 2.51$ ) than in the comparisons for standard and compact letters. The average price for this product is  $\leq 3.85$ .<sup>13</sup>

 $<sup>^{13}</sup>$  No reliable information for 2023 is available for GR and LT.

## 6 Additional comparisons

#### 6.1 Price trends

Letter prices in the comparison countries change at different points in time because of the different underlying conditions. The last change to the standard letter price in Germany was in January 2022.

The table below shows, by way of example, the change in the real prices for a standard letter from one year to the next and from the beginning to the end of the period from 2018 to 2023. The changes in the prices for the other product groups are shown in the annexes.

Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2022 to 2023	Change 2018 to 2023
AT	5%	0%	6%	-1%	3%	12%
BE	22%	1%	17%	5%	9%	64%
BG	0%	0%	3%	-3%	19%	19%
СН	-12%	5%	0%	10%	2%	5%
СҮ	0%	0%	0%	-3%	-6%	-9%
CZ	4%	-1%	-4%	6%	0%	4%
DE	1%	14%	1%	2%	-5%	15%
DK	15%	0%	11%	7%	-6%	28%
EE	0%	2%	42%	-5%	-15%	16%
ES	9%	8%	9%	4%	-1%	33%
FI	1%	7%	10%	4%	8%	33%
FR	15%	12%	8%	10%	-4%	45%
GR	0%	2%	40%	-2%		
HR	0%	0%	7%	-2%	-2%	2%
HU	-5%	8%	-8%	3%	0%	-3%
IE	1%	0%	1%	7%	7%	17%
IS	9%	-3%	9%	3%	23%	46%
IT	15%	0%	1%	-2%	2%	16%
LT	30%	0%	0%	29%		
LU	3%	13%	1%	-4%	19%	35%
LV	2%	98%	3%	16%	18%	185%
MT	4%	15%	0%	0%	17%	40%
NL	2%	9%	7%	-2%	-4%	11%
NO	13%	6%	3%	8%	-3%	29%
PL	22%	25%	-7%	6%	-3%	47%
PT	2%	2%	0%	2%	-4%	2%
RO	11%	23%	0%	34%	2%	86%
SE	0%	16%	16%	4%	0%	40%
SI	8%	12%	17%	-2%	48%	105%
SK	0%	29%	3%	-3%	5%	35%

Figure 8: development of inflation-adjusted prices in Europe for a standard letter

The table shows an increase in prices in the last five years in all countries except CY and HU.<sup>14</sup> However, these two exceptions may be due to fluctuations in exchange rates/inflation rates. The largest price increase was in Latvia, where the price rose by 185% from  $\leq 0.48$  to  $\leq 1.37$ . The next largest increase of 82% was in Slovenia, where the real price rose from  $\leq 0.39$  in 2018 to  $\leq 0.80$  in 2023. The change in Germany was 15% (2018:  $\leq 0.68$ ; 2022:  $\leq 0.78$ ).

## 6.2 Higher prices in other countries

The comparisons show that the same countries often have prices that are higher than the real prices for each of the comparable products in Germany.

The table below shows the 2023 prices of the foreign universal service providers' products that had a higher price than in Germany. The table does not include the products that had a lower price than the German universal service provider's corresponding product. The table lists the prices for the products comparable with a standard, compact, large and maxi letter. The table also lists the price in Germany and the average in Europe for comparison.

<sup>&</sup>lt;sup>14</sup> No reliable information for 2023 is available for GR and LT.

Countries more expensive than	Standard letter - real price (€)	Compact letter - real price (€)	Large letter - real price (€)	Maxi letter - real price (€)	
Germany					
AT		€1,19			
BE	€1,25	€1,25	€6,23	€6,23	
СН	€0,89				
DK	€1,48	€1,48	€7,38	€7,38	
EE	€0,86		€2,18		
ES			€2,58	€5,29	
FI	€1,95	€1,95	€7,80	€7,80	
FR	€1,09	€2,18	€5,65	€6,82	
HU				€3,37	
IE	€1,15	€1,15	€3,22		
IS	€1,80	€1,80		€3,73	
IT	€1,10	€2,55	€4,98	€4,98	
LU	€0,92	€0,92	€1,84	€3,67	
LV	€1,37	€1,63	€2,19	€3,54	
MT	-	-	€3,19	€5,07	
NL	€0,89	€1,79	€3,76	€3,76	
NO	€1,78	€2,32	€8,03	€8,03	
PT		€1,01	€1,56	€3,72	
SE	€1,23	€1,23	€4,94	€7,51	
SI	€0,80		€2,16	€2,53	
DE	€0,78	€0,91	€1,46	€2,51	
ø Europa insgesamt	€0,92	€1,08	€3,04	€4,10	

Figure 9: 2023 prices higher than the German price

The prices in BE, DK, FI, FR, IT, LU, LV, NL, NO and SE are higher than the prices in Germany in each product category. The prices in IE, PT and SI are higher than Deutsche Post AG's prices in three categories (standard, large and maxi letter/standard, compact and large letter). Other countries (such as ES and MT) have higher prices than Germany in one or two categories.

The countries with higher prices in at least three categories were looked at more closely. An analysis was made of structural data (total number of inhabitants, surface area, population density, inhabitants per postal outlet, letters per inhabitant, parcels per inhabitant, number of towns with more than 500,000 inhabitants) and of letter volumes and postal company data (postal outlets, total letter volumes, total number of employees). The comparison was based on data from 2021 because the annual reports and the data derived from them for 2022 had not yet all been published by the relevant foreign universal service providers.

The table below provides a comparison of the structural and company data for the selected countries, together with the data for Germany for comparison.

	Total number of inhabitants	Surface area (km²)	Population density	Inhabitants per postal outlet	Letters per inhabitant	Parcles per inhabitant	Metropolitan region area (km²)	Number of postal outlets	Total letter volume	Total number of employees
BE	11,566,041	30,666	377	17,604	111	16	30,451	657	1,291,945,600	24,862
DK	5,840,045	42,925	136	4,867	na	na	41,987	1,200	177,000,000	6,757
FI	5,533,793	338,450	16	na	na	na	304,316	na	492,200,000	18,571
FR	67,439,599	638,475	106	na	na	na	633,886	na	15,578,000	na
IE	5,006,907	69,947	72	4,558	na	na	68,665	na	246,327,000,000	10,421
IT	59,257,566	300,578	197	na	na	na	297,734	na	2,558,000,000	na
LU	634,730	2,595	245	na	na	na	2,586	57	117,100,000	na
LV	1,893,223	62,234	29	na	na	na	63,290	na	na	na
NL	1,747,515	37,382	467	na	na	na	34,188	na	2,048,000,000	37,365
NO	5,391,369	323,381	17	na	na	na	309,158	1,303	388,795,000	12,561
PT	10,352,042	91,888	113	na	na	na	90,996	570	934,500,000	12,882
SE	10,379,295	447,424	23	na	na	na	407,300	na	1,069,000,000	19,300
SI	2,108,977	20,273	104	na	na	na	na	na	na	na
DE	83,155,031	357,569	233	na	na	na	353,296	13,000	14,216,000,000	168,000

Figure 10: structural and company data for the countries with a higher standard letter price than Germany

No uniform conclusions can be drawn from the data on the reasons for the higher prices because some of the data is widely divergent. The differences can probably be explained by the inhabitant and surface area data, but a more detailed analysis would be necessary to be able to draw any valid conclusions. The company data for the letters segment (costs, revenue) that would be needed for a more detailed analysis are, however, not available. Nevertheless, in order to enable an analysis to be made in the future, the company data available have been compiled and presented here. A better picture of the links between price trends and structural data may emerge with time.

## 7 Summary

The comparisons produced various findings that are summarised below:

- Volumes are declining overall. The reasons for the decline in volumes may include digitalisation strategies of governments and authorities with the relevant legal basis and the cost benefits for senders associated with the digitalisation of communications.
- Many countries have a product for delivery on the next working day (D+1) as well as a less expensive product with a possibly slower delivery speed (D+X). There are additional conditions for senders for delivery on the next working day (D+1) in, for example, DK, ES and IT.
- The usual speed of delivery for the less expensive products with D+X delivery varies between one and five working days. The longest time is given.
- The range of products offered represents a response to changes in customer behaviour (digital/physical mail) and the coverage structure (volumes, costs).
- Many countries do not have a common distinction between standard and compact letters. The maximum weights in some of the comparison countries are much higher than for a standard letter in Germany.
- Prices for a standard letter rose between 2018 and 2023 in nearly all the comparison countries (not in CY and HU).
- Ten countries have prices that are higher than the price in Germany for each of the products compared. No uniform conclusions can be drawn from the data available on the reasons for the higher prices.
- Deutsche Post AG's prices are frequently below the European average. The prices for large and maxi letters are well below the European average.

The table below summarises the findings of the comparisons and compares the averages with the real prices for the corresponding products in Germany.

Standard letter	Comparison D+1	Comparison D+X	Realpreis DP AG
Average for whole comparison group	€1,55*	€0,92	€0,78
Average for listet companies	€1,24*	€0,80	€0,78
Average for non- listed companies	€1,67*	€1,67* €0,95	
Standar letter	€1,11		€0,91
Comparison D+1	€2,92		€1,46
Comparison D+X	€3,85		€2,51

#### **Overview of averages**

Source: Bundesnetzagentur

\* without FI, IS, NO, PT,RO because they do not offer a comparable D+1 product

Figure 11: Overview of averages

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Country	Company	Type of data collected	2014	2015	2016	2017	2018	2019	2020	2021	Change (%)
AT	österreich- ische Post	addressed	1,934,000,000	1,820,000,000	1,733,000,000	1,710,000,000	1,615,000,000	1,543,000,000	1,368,000,000	1,322,000,000	-32
BE	bpost	total	2,419,200,000	2,302,300,000	2,178,540,000	2,041,871,195	1,927,800,000	1,803,400,000	1,468,120,000	1,291,945,600	-47
СН	Die Post	addressed	2,203,100,000	2,171,600,000	2,088,800,000	2,001,900,000	1,898,000,000	1,807,000,000	1,706,000,000	1,811,000,000	-18
DE	Deutsche Post	addressed	8,882,000,000	8,552,000,000	8,242,000,000	7,964,000,000	7,709,000,000	7,450,000,000	6,827,000,000	6,314,000,000	-29
DK	PostNord Denmark	priority + non priority	545,000,000	460,000,000	373,000,000	305,000,000	265,000,000	238,500,000	193,200,000	177,000,000	-68
ES	Correos	total	3,099,000,000	2,563,000,000	2,774,000,000	2,637,000,000	2,700,000,000	2,410,000,000	1,849,000,000	1,637,000,000	-47
FI	Posti	addressed	900,000,000	815,000,000	760,000,000	710,000,000	670,000,000	636,500,000	535,000,000	492,000,000	-45
IE	An Post	total	435,815,000	349,492,000	331,759,000	295,717,000	269,907,000	278,522,000	258,747,000	246,327,000	-43
LU	Post Luxembourg	total	152,914,055	146,735,816	139,386,790	133,540,324	130,933,014	126,000,000	116,000,000	117,100,000	-23
NL	postNL	addressed	2,705,000,000	2,401,000,000	2,213,000,000	1,994,000,000	1,781,000,000	1,742,000,000	2,054,000,000	2,048,000,000	-24
NO	Posten Norge	addressed	916,805,000	857,743,000	763,103,000	685,454,000	602,764,000	542,793,000	438,148,000	388,795,000	-58
PT	ctt	addressed	841,300,000	814,700,000	780,200,000	736,600,000	680,700,000	619,000,000	516,900,000	484,600,000	-42
SE	PostNord Sweden	priority + non priority	1,983,000,000	1,872,000,000	1,765,000,000	1,637,000,000	1,464,000,000	1,346,000,000	1,186,000,000	1,069,000,000	-46

## Annex 1: overview of letter volumes 2014-2021

source: Postal companies' annual reports

DE: DPDHL's annual report for 2021 no longer includes international volumes (around 1bn items) in the figures for the German postal segment. Countries for which no reliable information is available were not included in the table.

Country	Nominal price domestic standard letter	Real price domestic standard letter	Weight	Delivery speed	Product name
	D+1	D+1			
AT	€1,00	€0,91	20 g	D+1	Prio Brief
BE	€2,17	€1,95	50 g	D+1	Prior
BG	€0,64	€0,63	50 g	na	Priority
СН	€1,11	€1,08	100 g	D+1	A-Post
CY	€0,41	€0,38	50 g	na	1st Priority
CZ	€1,16	€0,99	50 g	D+1	Ordinary Letter Priority
DE	€0,85	€0,78	20 g	D+1	Standardbrief
DK	€4,30	€3,94	50 g	D+1	Quick Letter
EE	€1,50	€1,21	250 g	D+1	Express Letter
ES	€4,68	€4,29	20 g	D+1	Carta certificada
FI					
FR	€1,43	€1,35	20 g	D+1	Lettre Proiritaire
GR				D+1	Prioirity A
HR	€0,86	€0,77	50 g	D+1	Priority Letter
HU	€0,62	€0,53	50 g	D+1	mit Priority
IE	€1,25	€1,15	100 g	D+1	Letter
IS					Letter
IT	€2,80	€2,56	100 g	D+1	Posta1
LT					Letter
LU	€1,00	€0,92	50 g	na	Brief Format XS
LV	€1,65	€1,37	20 g	na	Ordinary Letter
MT	€0,37	€0,35	50 g	D+1	Standard Letter
NL	€1,01	€0,89	20 g	D+1	Brief
NO					
PL	€1,03	€0,89	500 g	D+1	Format S Priorytetowa
PT					
RO					
SE	€7,61	€7,00	50 g	D+1	Express Letter
SI	€1,05	€0,95	50 g	na	Priority Ordinary Letter
SK	€1,00	€0,88	50 g	D+1	Letter
Ø		€1,55			

<sup>&</sup>lt;sup>15</sup> Source: Postal companies' websites/Eurostat

Country	Nominal price domestic standard letter D+X	Inflation rate 2022	Real price domestic standard letter D+X	Weight	Delivery speed	Product name
AT	€0,81	0.086	€0,74	20 g	D+2-3	Eco Brief
BE	€1,39	0.103	€1,25	50 g	D+3	Non Prior
BG	€0,38	0.013	€0,38	50 g	na	Non Priority
СН	€0,91	0.027	€0,89	100 g	D+3	B-Post
СҮ	€0,34	0.081	€0,31	50 g	na	2nd Priority
CZ	€0,87	0.148	€0,74	50 g	D+2	Ordinary Letter Economy
DE	€0,85	0.087	€0,78	20 g	D+1	Standardbrief
DK	€1,61	0.085	€1,48	50 g	D+1-5	Letter
EE	€0,90	0.194	€0,73	250 g	D+3	Letter
ES	€0,78	0.083	€0,72	20 g	D+3	Carta
FI	€2,10	0.072	€1,95	50 g	D+4	Letter
FR	€1,16	0.059	€1,09	20 g	D+3	Lettre Verte
GR		0.093		na	D+3	Priority B
HR	€0,47	0.107	€0,42	50 g	D+3-4	Letter
HU	€0,44	0.153	€0,37	50 g	D+3	ohne Priority
IE	€1,25	0.081	€1,15	100 g	D+1	Letter
IS	€1,91	0.057	€1,80	50 g	D+2-5	Letter
IT	€1,20	0.087	€1,10	20 g	D+4	Posta4
LT		0.189		na		
LU	€1,00	0.082	€0,92	50 g	na	Brief Format XS
LV	€1,65	0.172	€1,37	20 g	na	Ordinary Letter
MT	€0,37	0.061	€0,35	50 g	D+1	Standard Letter
NL	€1,01	0.116	€0,89	20 g	D+1	Brief
NO	€1,90	0.062	€1,78	20 g	D+2-3	
PL	€0,83	0.132	€0,72	500 g	D+3	Format S Ekonomiczna
PT	€0,57	0.081	€0,52	20 g	D+3	Correio normal
RO	€0,59	0.12	€0,52	50 g	D+5	Non Priority Letter Mail
SE	€1,34	0.081	€1,23	50 g	D+2	Letter
SI	€0,88	0.093	€0,80	50 g	na	Letter
SK	€0,75	0.121	€0,66	50 g	D+2	Letter
ø			€0,92			

# Annex 3: overview of nominal and real prices for a standard letter (D+X)<sup>16</sup>

## Annex 4: overview of nominal and real prices for a compact letter (D+X)<sup>17</sup>

Country	Nominal price domestic compact letter D+X	Inflation rate 2022	Real price domestic compact etter D+X	Weight	Delivery speed	Product name
AT	€1,30	0.086	€1,19	75 g	D+2-3	Eco Brief
BE	€1,39	0.103	€1,25	50 g	D+3	Non Prior
BG	€0,38	0.013	€0,38	50 g	na	Non Priority
СН	€0,91	0.027	€0,89	100 g	D+3	B-Post
СҮ	€0,34	0.081	€0,31	50 g	na	2nd Priority
CZ	€0,87	0.148	€0,74	50 g	D+2	Ordinary Letter Economy
DE	€1,00	0.087	€0,91	50 g	D+1	Kompaktbrief
DK	€1,61	0.085	€1,48	50 g	D+1-5	Letter
EE	€0,90	0.194	€0,73	250 g	D+3	Letter
ES	€0,88	0.083	€0,81	50 g	D+3	Carta
FI	€2,10	0.072	€1,95	50 g	D+4	Letter
FR	€2,32	0.059	€2,18	100 g	D+3	Lettre Verte
GR		0.093			D+3	Priority B
HR	€0,47	0.107	€0,42	50 g	D+3-4	Letter
HU	€0,44	0.153	€0,37	50 g	D+3	ohne Priority
IE	€1,25	0.081	€1,15	100 g	D+1	Letter
IS	€1,91	0.057	€1,80	50 g	D+2-5	Letter
IT	€2,70	0.087	€2,47	50 g	D+4	Posta4
LT		0.189			na	
LU	€1,00	0.082	€0,92	50 g	na	Brief Format XS
LV	€1,97	0.172	€1,63	100 g	na	Ordinary Letter
MT	€0,37	0.061	€0,35	50 g	D+1	Standard Letter
NL	€2,02	0.116	€1,79	50 g	D+1	Brief
NO	€2,47	0.062	€2,32	50 g	D+2-3	
PL	€0,83	0.132	€0,72	500 g	D+3	Format S Ekonomiczna
РТ	€1,10	0.081	€1,01	100 g	D+3	Correio normal
RO	€0,59	0.12	€0,52	50 g	D+5	Non Priority Letter Mail
SE	€1,34	0.081	€1,23	50 g	D+2	Letter
SI	€0,88	0.093	€0,80	50 g	na	Letter
SK	€0,75	0.121	€0,66	50 g	D+2	Letter
ø			€1,11			

<sup>&</sup>lt;sup>17</sup> Source: Postal companies' websites/Eurostat

Country	Nominal price domestric large letter D+X	Inflation rate 2022	Real Price domestic large letter D+X	Weight	Delivery speed	Product name
AT		0.086				
BE	€6,95	0.103	€6,23	1000 g	D+3	Non Prior
BG	€0,66	0.013	€0,66	500 g	na	Non Priority
СН		0.027				
СҮ	€0,56	0.081	€0,51	500 g	na	2nd Priority
CZ	€1,20	0.148	€1,02	500 g	D+2	Ordinary Letter Economy
DE	€1,60	0.087	€1,46	500 g	D+1	Kompaktbrief
DK	€8,07	0.085	€7,38	2000 g	D+1-5	Letter
EE	€2,70	0.194	€2,18	500 g	D+3	Letter
ES	€2,81	0.083	€2,58	500 g	D+3	Carta
FI	€8,40	0.072	€7,80	1000 g	D+4	Letter
FR	€6,00	0.059	€5,65	20 g	D+3	Lettre Verte
GR		0.093				Priority B
HR	€1,17	0.107	€1,04	500 g	D+3-4	Letter
HU	€1,31	0.153	€1,11	500 g	D+3	ohne Priority
IE	€3,50	0.081	€3,22	500 g	D+1	Letter
IS		0.057		50 g	D+2-3	Letter
IT	€5,45	0.087	€4,98	1000 g	D+4	Posta4
LT		0.189				
LU	€2,00	0.082	€1,84	500 g	na	Brief Format XS
LV	€2,64	0.172	€2,19	500 g	na	Ordinary Letter
MT	€3,40	0.061	€3,19	500 g	D+1	Standard Letter
NL	€4,25	0.116	€3,76	2000 g	D+1	Brief
NO	€8,56	0.062	€8,03	1000 g	D+2-3	
PL	€0,83	0.132	€0,72	500 g	D+3	Format S Ekonomiczna
РТ	€1,70	0.081	€1,56	500 g	D+3	Correio normal
RO	€0,63	0.12	€0,55	500 g	D+5	Non Priority Letter Mail
SE	€5,37	0.081	€4,94	500 g	D+2	Letter
SI	€2,38	0.093	€2,16	500 g	na	Letter
SK	€1,30	0.121	€1,14	500 g	D+2	Letter
ø			€3,04			

# Annex 5: overview of nominal and real prices for a large letter (D+X)<sup>18</sup>

<sup>&</sup>lt;sup>18</sup> Source: Postal companies' websites/Eurostat

## Annex 6: overview of nominal and real prices for a maxi letter (D+X)<sup>19</sup>

Country	Nominal price domestric maxi letter D+1	Inflation rate 2022	Real Price domestic maxi letter D+1	Weight	Delivery speed	Product name	
AT		0.086					
BE	€6,95	0.103	€6,23	1000 g	D+3	Non Prior	
BG	€0,79	0.013	€0,78	50 g	na	Non Priority	
СН		0.027					
СҮ	€1,60	0.081	€1,47	1000 g	na	2nd Priority	
CZ	€1,45	0.148	€1,23	1000 g	D+2	Ordinary Letter Economy	
DE	€2,75	0.087	€2,51	1000 g	D+1	Maxibrief	
DK	€8,07	0.085	€7,38	2000 g	D+1-5	Letter	
EE	€2,85	0.194	€2,30	1000 g	D+3	Letter	
ES	€5,77	0.083	€5,29	1000 g	D+3	Carta	
FI	€8,40	0.072	€7,80	1000 g	D+4	Letter	
FR	€7,25	0.059	€6,82	1000 g	D+3	Lettre Verte	
GR		0.093				Priority B	
HR	€1,62	0.107	€1,45	1000 g	D+3-4	Letter	
HU	€3,98	0.153	€3,37	2000 g	D+3	ohne Priority	
IE		0.081					
IS	€3,96	0.057	€3,73	2000 g	D+2-5	Letter	
IT	€5,45	0.087	€4,98	1000 g	D+4	Posta4	
LT		0.189					
LU	€4,00	0.082	€3,67	2000 g	na	Brief Format XS	
LV	€4,27	0.172	€3,54	1000 g	na	Ordinary Letter	
MT	€5,40	0.061	€5,07	1000 g	D+1	Standard Letter	
NL	€4,25	0.116	€3,76	2000 g	D+1	Brief	
NO	€8,56	0.062	€8,03	1000 g	D+2-3		
PL	€0,98	0.132	€0,85	1000 g	D+3	Format M Ekonomiczna	
PT	€4,05	0.081	€3,72	2000 g	D+3	Correio normal	
RO	€0,73	0.12	€0,64	1000 g	D+5	Non Priority Letter Mail	
SE	€8,06	0.081	€7,41	1000 g	D+2	Letter	
SI	€2,79	0.093	€2,53	1000 g	na	Letter	
SK	€2,00	0.121	€1,76	1000 g	D+2	Letter	
Ø			€3,85				

<sup>&</sup>lt;sup>19</sup> Source: Postal companies' websites/Eurostat

# Annex 7: development of inflation-adjusted prices in Europe for a compact letter

Country	Change 2018	Change 2019	Change 2020	Change 2021	Change 2022	Change 2018
	to 2019	to 2020	to 2021	to 2022	to 2023	to 2023
AT	1%	1%	4%	-2%	-6%	-2%
BE	22%	1%	17%	5%	9%	64%
BG	0%	0%	3%	-3%	19%	19%
СН	-12%	5%	1%	8%	3%	5%
СҮ	0%	0%	0%	-3%	-6%	-9%
CZ	4%	-1%	-3%	4%	0%	4%
DE	0%	13%	1%	2%	-6%	10%
DK	15%	0%	11%	7%	-6%	28%
EE	0%	2%	42%	-5%	-15%	16%
ES	10%	7%	8%	2%	-1%	29%
FI	1%	7%	10%	4%	8%	34%
FR	15%	11%	9%	9%	-4%	45%
GR	0%	1%	67%	-2%		
HR	0%	0%	7%	-2%	-2%	2%
HU	0%	-22%	-8%	3%	0%	-26%
IE	1%	0%	1%	7%	7%	17%
IS	9%	7%	-1%	4%	23%	46%
IT	1%	0%	1%	-2%	-3%	-3%
LT	45%	0%	0%	24%		
LU	3%	13%	1%	-4%	19%	35%
LV	2%	189%	-17%	12%	15%	213%
MT	4%	15%	0%	0%	17%	40%
NL	2%	9%	7%	-2%	-4%	12%
NO	8%	4%	-3%	6%	-3%	12%
PL	22%	25%	-7%	6%	-3%	47%
РТ	1%	1%	7%	-1%	36%	49%
RO	-3%	23%	0%	32%	4%	63%
SE	0%	16%	16%	4%	0%	40%
SI	11%	12%	21%	-1%	18%	74%
SK	0%	29%	2%	-2%	5%	35%

# Annex 8: development of inflation-adjusted prices in Europe for a large letter

Country	Change 2018	Change 2019	Change 2020	Change 2021	Change 2022	Change 2018
	to 2019	to 2020	to 2021	to 2022	to 2023	to 2023
BE	22%	1%	17%	5%	8%	64%
BG	-2%	15%	-8%	31%	-8%	25%
CY	0%	2%	2%	-4%	-7%	-7%
CZ	0%	3%	-4%	5%	-3%	1%
DE	1%	8%	1%	1%	-6%	4%
DK	38%	0%	11%	-11%	-7%	28%
EE	2%	-1%	39%	-5%	-16%	13%
ES	2%	6%	5%	4%	-2%	18%
FI	1%	7%	10%	4%	8%	33%
FR	15%	8%	2%	3%	-4%	25%
GR	1%	0%	34%	-2%		-100%
HR	3%	0%	-1%	-2%	-9%	-9%
HU	-34%	9%	-7%	7%	0%	-29%
IE	12%	10%	0%	-2%	-3%	18%
IS	21%	-3%	1%	3%	-100%	-100%
IT	-1%	1%	1%	-2%	-6%	-7%
LT	31%	0%	1%	10%		-100%
LU	4%	12%	2%	-4%	19%	36%
LV	2%	61%	3%	5%	22%	117%
MT	0%	45%	1%	7%	5%	64%
NL	2%	-5%	17%	-4%	-14%	-6%
NO	6%	7%	-3%	4%	-7%	7%
PL	-6%	7%	-23%	6%	-3%	-20%
PT	3%	0%	0%	-1%	5%	8%
RO	-8%	3%	19%	32%	-5%	41%
SE	-4%	17%	16%	4%	-33%	-10%
SI	8%	11%	13%	-2%	36%	80%
SK	-2%	15%	1%	-1%	7%	20%

Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2022 to 2023	Change 2018 to 2023
BE	22%	1%	17%	5%	8%	64%
BG	0%	11%	1%	12%	-5%	20%
СҮ	-2%	15%	-9%	-4%	-6%	-7%
CZ	2%	2%	-5%	6%	-5%	0%
DE	1%	4%	1%	-1%	-6%	-1%
DK	15%	0%	11%	-11%	-7%	6%
EE	1%	0%	40%	-5%	-15%	13%
ES	2%	1%	3%	4%	-2%	10%
FI	1%	-29%	10%	4%	8%	-11%
FR	15%	8%	12%	-12%	-7%	13%
GR	0%	1%	57%	-2%		
HR	3%	1%	-1%	-2%	-8%	-8%
HU	0%	6%	-6%	7%	0%	5%
IE	-	-31%	0%	-2%		
IS	21%	-3%	1%	3%	-10%	10%
IT	-1%	1%	1%	-2%	-6%	-7%
LU	3%	13%	2%	-3%	19%	35%
LV	3%	45%	3%	-13%	65%	120%
MT	3%	20%	1%	4%	1%	31%
NL	1%	6%	6%	-4%	-14%	-6%
NO	9%	7%	-3%	4%	-7%	10%
PL	-4%	6%	-7%	5%	-4%	-6%
PT	3%	3%	0%	-1%	7%	13%
RO	-17%	-16%	70%	8%	-6%	21%
SE	-2%	18%	15%	-9%	-14%	5%
SI	11%	8%	17%	-2%	-2%	33%
SK	2%	12%	1%	-1%	-5%	9%

Annex 9: development of inflation-adjusted prices in Europe for a maxi letter

## **Publisher's details**

#### Publisher

Federal Network Agency Tulpenfeld 4 53113 Bonn

## Ordering address | Contact

Sabrina Schönenberg Tulpenfeld 4 53113 Bonn Sabrina.Schoenenberg@bnetza.de www.bundesnetzagentur.de Telephone: +49 228 14-2130 Telephone: +49 228 14-2132

## April 2023

**Text** Ruling Chamber 5

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