

Report

Terms and Conditions and Rates
for Large Volume Mail and Mail
Consolidation on the Letters Market



Bundesnetzagentur

Terms and Conditions and Rates for Large Volume Mail and Mail Consolidation on the Letters Market

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Summary

The complete Deutsche Post AG (DP AG) conveyance service chain extends from accepting the letter post item from the sender to handing the item over to the addressee. The part of the chain that is performed by DP AG is referred to as an access service. Besides collecting, forwarding and delivering, the access service can also include the sorting of mail items.¹ The services performed by contracting parties to prepare letter-post items for access services are referred to as upstream services or, in the postal sector, "access service-relevant work by other providers". Letter-post items can be dropped off by contracting parties either in an outward mail centre (nationwide) or an inward mail centre (within the mail centre's routing region).² The breakdown of the conveyance chain as a whole into access and upstream services is shown in the figure below.

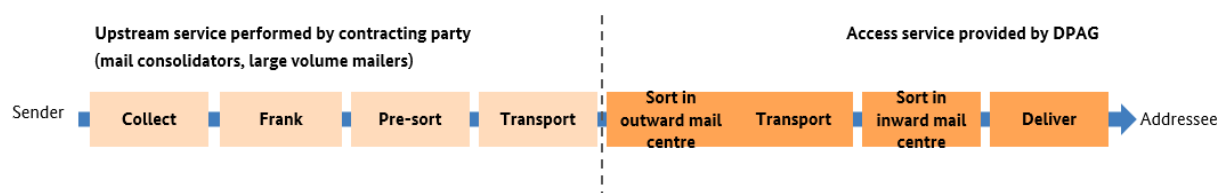


Figure 1: Example of outward mail centre access service

Large volume mailers and mail consolidators that drop off mail items ready for access services with DP AG receive a quantity-based refund on the respective postage rate. The difference between the postage rate and the quantity-based refund is referred to as the access service rate. The following table lists the access service rates valid for large volume mail and mail consolidation as from 1 July 2023.³

Access service rates for large volume mail and mail consolidation in 2023 at maximum refund

| | Postage | Refund by drop-off type | | "ID discount" | "Delivery speed discount" | Access service rate by drop-off type including "ID and delivery speed" | |
|-----------------|---------|-------------------------|--------------------|---------------|---------------------------|--|--------------------|
| | | Outward mail centre | Inward mail centre | | | Outward mail centre | Inward mail centre |
| | | | | | | | |
| Standard letter | 0.850 € | 41% | 44% | 3% | 3% | €0.451 | €0.425 |
| Compact letter | 1.000 € | 33% | 36% | 3% | 3% | €0.610 | €0.580 |
| Large letter | 1.600 € | 30% | 33% | 3% | 3% | €1.024 | €0.976 |
| Maxi Letter | 2.750 € | 27% | 30% | 3% | - | €1.925 | €1.843 |
| Postcard | 0.700 € | 45% | 48% | 3% | 3% | €0.343 | €0.322 |

Figure 2: Access service rates for large volume mail and mail consolidation (at maximum refund)

The special feature of the market for letter-post items is that DP AG, the operator of the nationwide postal network, also offers mail consolidation on the postal market. As an example, the following figure shows the consolidation and franking rates (option 1) and fixed rates (option 2) for outward mail centre drop-offs for DP AG's own subsidiary Deutsche Post InHaus Services GmbH (DP IHS).

¹ cf. Cologne Administrative Court, 1 December 2015 – 22 K 3555/14

² cf. General Terms and Conditions of Deutsche Post for Access Services for the Conveyance of Letters for Commercial Consolidation (General Terms and Conditions for Letter Access Services)

³ See Annex 1 and Annex 2 for quantity-based scales.

Average rates for DP IHS in 2023

| | Option 1 | | Option 2 |
|--|--------------------|---------------|-------------|
| | Consolidation rate | Franking rate | Fixed price |
| Standard letter outward mail centre | €0.032 | €0.023 | €0.549 |
| Compact letter outward mail centre | €0.035 | €0.024 | €0.736 |
| Large letter outward mail centre | €0.075 | €0.053 | €1.201 |
| Maxi Letter outward mail centre | €0.139 | €0.092 | €2.270 |
| Postcard outward mail centre | €0.017 | €0.018 | |

Figure 3: Average rates for DP IHS in 2023

In addition to access services in connection with basic products, DP AG also offers contracts for access services for the Dialogpost product. Dialogpost is for mail items consisting solely of advertising content, eg mail-outs with free samples, promotions or customer magazines. Dialogpost dispatches are in decline overall. The volume of Dialogpost has fallen by 27.06% since 2014. Customers and mail consolidators can drop off Dialogpost mail items ready for access services at DP AG bulk mail acceptance offices in inward mail centres. The basis for this is formed by the General Terms and Conditions for Dialogpost Inward Mail Centre Customer Access Services, the General Terms and Conditions for Dialogpost Inward Mail Centre Consolidation Access Services and the General Terms and Conditions for BRIEF NATIONAL, the Prices and Services brochure and the National Dialogpost brochure.

The postage rate for Dialogpost is dependent on the item weight. Under some circumstances, further discounts are possible in addition to the refunds granted under access service contracts. Besides a minimum volume of 5,000 items, the production of bundles, containers or pallets is required for this. The postage rate (regular and discounted) for Dialogpost and the maximum access service rate when using contracts for inward mail centre Dialogpost access services and Dialogpost cooperation are shown in the figure below.

Postage/access service rates per Dialogpost mail item

| | Dialogpost regular | Dialogpost regular discounted | Dialogpost access service rate contracts (inward mail centre customer and commercial consolidation) | Dialogpost access service rate contracts (inward mail centre customer and commercial consolidation)--discounted | Access service rate for Dialogpost cooperation agreement |
|--|--------------------|-------------------------------|---|---|--|
| Card* | €0.31 | €0.29 | €0.30 | €0.26 | €0.21 |
| Standard | | | | | |
| 0-20 g | €0.34 | €0.32 | €0.33 | €0.28 | €0.23 |
| 21-50 g | €0.39 | €0.37 | €0.38 | €0.32 | €0.27 |
| Large | | | | | |
| 0-50 g | €0.48 | €0.46 | €0.47 | €0.41 | €0.33 |
| 51-100 g | €0.61 | €0.59 | €0.59 | €0.53 | €0.43 |
| 101-250 g | €0.75 | €0.72 | €0.73 | €0.66 | €0.53 |
| 251-500 g | €0.82 | €0.79 | €0.80 | €0.72 | €0.58 |
| 501-1000 g | €0.95 | €0.91 | €0.92 | €0.84 | €0.67 |
| Surcharges | | | | | |
| Production surcharge | €0.05 | | €0.05 | | |
| EASY (small volumes from 500 to 4,999) | €0.15 | | €0.15 | | |

Source: DP AG, Dialogpost brochure + Bundesnetzagentur

* Price based on card size and weight (maximum 500 g/m³)

Figure 4: Postage and access service rates per Dialogpost mail item

1 Introduction

Mail volume on the letters market consists of private and business mail. Under certain circumstances, business mail consignors can drop off their mail items directly at Deutsche Post AG or other postal distribution services themselves either as large volume mailers or through a service provider, referred to as a mail consolidator. Because only part of DP AG's network is used in these cases, this is referred to as access mail. As far as the Bundesnetzagentur is aware, the most significant share of mail volume is generated by access mail. In 2020, 8.11bn access mail items in total were entrusted to DP AG, 1.16bn of which from competitors.⁴ Revenue from downstream access mail totalled €4.15bn in 2020.⁵ By contrast, private mail plays only a secondary role within the total mail volume on the letters market. The revenue generated on the market for postal services subject to licence amounted to €8.08bn in total in 2020.⁶ Retail customers accounted for only around 14% of this.

Given the significance of access mail for the letters market, the Bundesnetzagentur publishes an annual report on the terms and conditions and rates for large volume mail and mail consolidation; the first report was published in 2019. The aim of the report is to achieve greater transparency of the terms and conditions and rates for access mail. It shows the development in rates, the terms and conditions for preparing basic DP AG products for access services and the structures and market players in the business customer segment. This report contains the changes to DP AG's access service offerings and updates of all figures for 2023, including DP AG's postage and refund rates and DP IHS remuneration.

⁴ BNetzA (2021); 2020/2021 Post Activity Report, page 14

⁵ BNetzA (2021); 2020/2021 Post Activity Report, page 15, figure 7

⁶ BNetzA (2021); 2020/2021 Post Activity Report, page 17, figure 10

2 Network access on the letters market

As the market-dominant postal service provider, DP AG is required to offer network access for its competitors in the field of postal services subject to licence. The term "network" can be used to refer to physical network infrastructure or service networks. In the postal sector the physical component is limited to the network hubs and in particular to the mail centres. The hubs are connected by service structures, as a result of which the postal sector is less capital-intensive and more personnel-intensive compared to the telecommunications, energy and railway sectors. Personnel (eg for transport and delivery) is therefore a crucial element for a postal company.

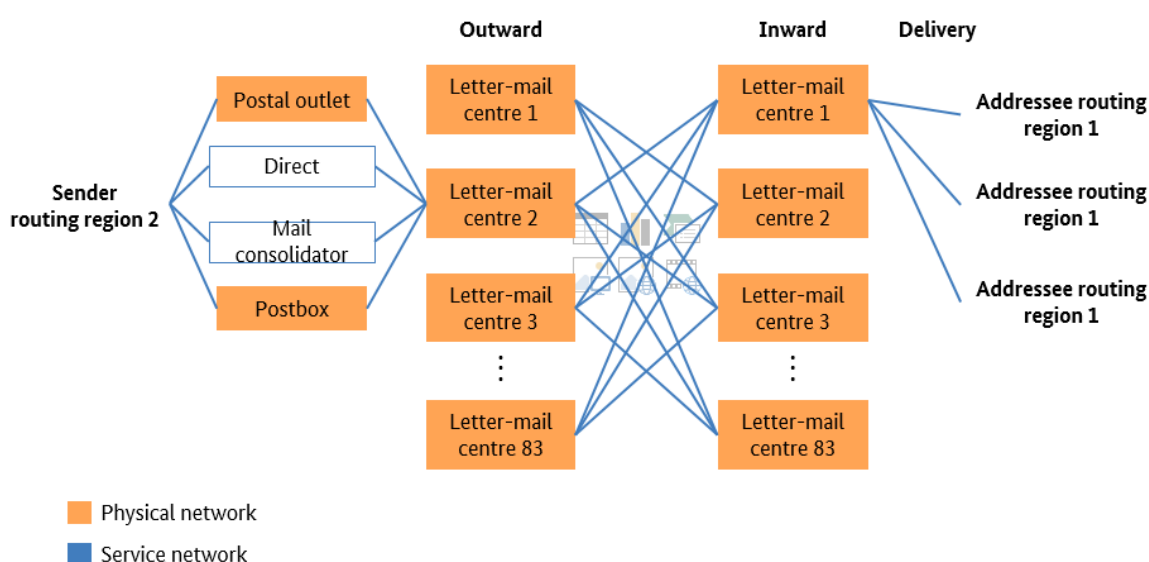


Figure 5: Network structure in the postal sector

Competition with DP AG can take two forms: firstly, there is the establishment of a parallel network (**end-to-end competition**) and, secondly, there is the partial use of DP AG's network (**network access competition**). Partial use of DP AG's network is when mail items are dropped off directly at the mail centre, and thus both DP AG's physical network and its service network are utilised from the mail centre onwards. In this scenario DP AG does not have to collect the mail items deposited in collection boxes or brought to postal outlets. DP AG is also spared the stages of the process that entail bringing the mail items to the mail centre.

In terms of end-to-end competition, there are two associations of regional and national postal service providers in Germany that cooperate to run a network parallel to DP AG's network. The association of different regional companies is intended to ensure the possibility of national delivery independent of DP AG's network. The individual postal service providers consolidate the mail items from their customers and ensure delivery within their regions. Through their cooperative network, the individual postal service providers can utilise the services of other cooperation partners and offer delivery beyond their own regions. Such cooperative networks are offered in Germany by mail alliance and P2 Die zweite Post.

The mail alliance cooperative network was founded in early 2010 and includes Mediengruppe Pressedruck, PIN AG, MADSACK Mediengruppe, FUNKE Mediengruppe, Deutsche Versand Service GmbH and CITIPOST-

Verbund GmbH.⁷ Operated by mailworX GmbH, mail alliance has more than 60 private delivery operations with around 55,000 mail delivery people in total.

The P2 Die zweite Post⁸ cooperative network consists of more than 50 regional postal services and has been operating on the postal market since 2008. It has three main hubs (Stuttgart, Chemnitz and Biebesheim/Rhein). The total mail volume of the regional postal services in the P2 cooperative network is more than 600mn mail items per year from around 50,000 customers. The Bundesnetzagentur does not have access to information on how many mail items from this total volume are distributed or delivered through the cooperative network.

The second form of competition, network access competition, plays a special role because there is to date no other postal service provider that operates a nationwide alternative network to that of DP AG. While DP AG's competitors can achieve a significantly greater density of delivery by working together, nationally they are still dependent on the DP AG network to enable full coverage for their customers, and they are thus not entirely independent.

The dual functions of operators are characteristic of **network access competition**. For its personal customers the postal service provider is a competitor to DP AG but at the same time the provider is itself a customer of the dominant company; after performing its own services it uses only a part of DP AG's overall network and thus DP AG's overall conveyance service (referred to as access service, see Chapter 3). DP AG's competitors no longer have to rely on DP AG's conveyance service as an end-to-end product, but they are still able to offer their customers universal delivery.

⁷ Information on the cooperative network is taken from the website www.mailalliance.net.

⁸ Information on the cooperative network is taken from the website www.die-zweite-post.de

3 Access services for basic DP AG products

The complete DP AG conveyance service chain extends from accepting the letter post item from the sender to handing the item over to the addressee. An access service within the meaning of section 28(1) of the German Postal Act (PostG), is any part of a postal service provider's conveyance chain that can be performed separately.⁹ The component of the entire conveyance service less the consignor's own conveyance service is referred to as an access service. Besides collecting, forwarding and delivering, the access service can also include the sorting of mail items.¹⁰ The services performed by the contracting party to prepare mail items for access services are referred to as upstream services. This can include franking, pre-sorting, numbering and the dropping off of mail items in the mail centre. Mail items can be dropped off by the contracting party either in an outward mail centre (nationwide) or an inward mail centre (within the mail centre's routing region).¹¹

The breakdown of the conveyance chain as a whole into access and upstream services is shown in the figure below.

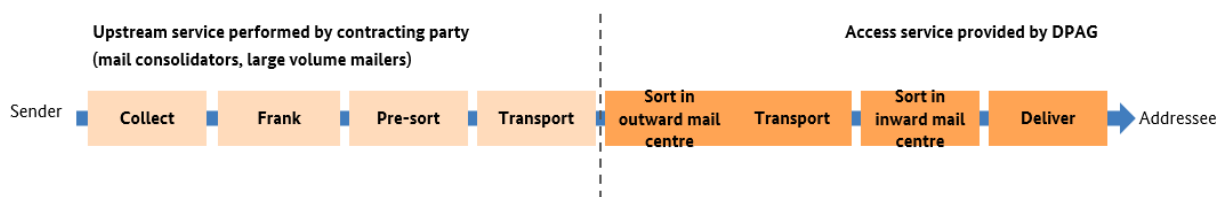


Figure 6: Example of outward mail centre access service

Besides private customers, DP AG's network is used by business customers as well. Business customers can be divided into large volume mailers, small volume mailers and mail consolidators. Large volume mailers (eg insurance companies) have high mailing volumes and can therefore enter into contractual agreements for access services with DP AG directly. Companies with small mailing volumes (small volume mailers) without the minimum volume necessary for an access service agreement can use a mail consolidator. The mail consolidator collates mail items from its customers and, in turn, drops these off with DP AG as a large volume mailer for access service. Large volume mailers and mail consolidators receive a quantity-based refund on the respective postage rate. The difference between the postage rate and the quantity-based refund is referred to as the access service rate. The mail consolidator then passes the refund on, less the agreed service costs (processing fee), to its customers (see Chapter 4).

The following figure shows DP AG's refund rates valid as from 1 July 2023, using the outward mail centre access service as an example.

⁹ cf. German Federal Administrative Court, 20 May 2009 – 6 C 14.08; Higher Administrative Court, 22 January 2008 – 13 A 4362/00; Cologne Administrative Court, 1 December 2015 – 22 K 3555-14

¹⁰ cf. Cologne Administrative Court, 1 December 2015 – 22 K 3555/14

¹¹ cf. General Terms and Conditions of Deutsche Post for Access Services for the Conveyance of Letters for Commercial Consolidation (General Terms and Conditions for Letter Access Services)

DP AG refund rates 2023

| Outward mail centre customer letter/outward mail centre consolidation letter | | | | | |
|---|------------------------|-----------------------|---------------------|--------------------|-----------------|
| Minimum number of mail items per drop-off | Standard letter | Compact letter | Large letter | Maxi Letter | Postcard |
| | in % | in % | in % | in % | in % |
| from 500 to 1,000 mail items | – | – | 16% | 13% | – |
| from 1,001 to 2,000 mail items | – | – | 19% | 15% | – |
| from 2,001 to 3,000 mail items | – | – | 22% | 19% | – |
| from 3,001 to 4,000 mail items | – | – | 26% | 23% | – |
| upwards of 4,001 mail items | – | – | 30% | 27% | – |
| from 5,000 to 10,000 mail items | 28% | 20% | 30% | 27% | 32% |
| from 10,001 to 15,000 mail items | 30% | 23% | 30% | 27% | 34% |
| from 15,001 to 20,000 mail items | 34% | 26% | 30% | 27% | 38% |
| from 20,001 to 25,000 mail items | 37% | 30% | 30% | 27% | 41% |
| upwards of 25,001 mail items | 41% | 33% | 30% | 27% | 45% |

Figure 7: Refund rates for outward mail centre drop-off as from 1 July 2023

An inward mail centre drop-off further increases the achievable refund as the services of the outward mail centre and the transport between the mail centres do not have to be used and there is no outbound sorting. In this scenario, the letter-post items are already in the addressee's target region. The refund rates valid as from 1 July 2023 for inward mail centre drop-off are shown in the following figure.

DP AG refund rates 2023

| Inward mail centre customer letter/inward mail centre consolidation letter | | | | | |
|---|------------------------|-----------------------|---------------------|--------------------|-----------------|
| Minimum number of mail items per drop-off | Standard letter | Compact letter | Large letter | Maxi Letter | Postcard |
| | in % | in % | in % | in % | in % |
| upwards of 100 mail items | | | 36% | 33% | |
| upwards of 250 mail items | 44% | 36% | 33% | 30% | 48% |

Figure 8: Refund rates for inward mail centre drop-off as from 1 July 2023

Large volume mailers and mail consolidators can enter into contracts with DP AG as set out in section 28(1) PostG. These contracts set out the upstream services to be performed by the large volume mailer or mail consolidator to prepare mail items for access services, the requirements for the franking of letter-post items, the rules for franking and the exact refund rules.

DP AG offers large volume mailers and mail consolidators 12 different contracts/agreements and additional agreements for access services. As from 1 January 2023 the DP AG stopped offering the contract for the performance of infrastructure services, which was introduced in 2018 and in 2022 included a 5% refund for performing certain upstream services (infrastructural services) in the area of franking.¹² One of the required

¹² For further information about the contract on infrastructure services see the 2022 report, chapter 3.6.

upstream services was the electronic advance notice of each drop-off of franked letter-post items in DP AG's order management system. This is an interactive platform offering DP AG business customers the opportunity to enter and retrieve information about dropped off mail items.¹³ Letter-post items also had to be franked using a layout template. Since 1 January 2023 refunds for franking services have been included in contracts for outward/inward mail centre customer letter access services and in contracts for outward/inward mail centre letter commercial consolidation access services. The contracts for Dialogpost are described in more detail in Chapter 8. With regard to systems and amounts, access service rates are the same for mail consolidators and large volume mailers. However, there are differences between large volume mailers and mail consolidators in terms of the conditions to be met to prepare mail items for access services, such as affixing a mail consolidator code. None of these contracts have a fixed duration and DP AG's contracting partners are not required to utilise the contract or to make drop-offs. It is not apparent from the contracts submitted to the Bundesnetzagentur whether or not the contracts entered into with DP AG are actively used. The number shown for individual contracts may therefore be higher than the number of contracts actually utilised. The Bundesnetzagentur is unable to filter out "unutilised" contracts until significant amendments are made to them. For this reason the information on the number of contracts presented here may differ from prior Bundesnetzagentur publications. The contracts offered by DP AG are listed below with a brief description of their content and terms and conditions.

3.1 Agreement on the IT franking of mail items

The agreement on IT franking of mail items comprises the payment of postage for mail items and the billing of the postage charges using standard software or software created by the customer. The software created is approved by a DP AG specialist for IT franking. Besides the agreement itself, the basic requirements for utilising IT franking are sorting by postcode, the sequential numbering of mail items, the certification of the address layout and the franking mark with a matrix code in accordance with the rules of the brochure "Mail Items for Automated Systems" plus an average minimum mailing volume of 4,000 standard/2,000 compact mail items or 200 large and maxi items.¹⁴ The mail items are dropped off at DP AG's bulk mail acceptance offices. In addition to being franked, mail items must also be sorted and numbered to qualify for a refund. The DP AG contracting party receives a refund of 1% of the current postage rate for the respective basic product.

The following figure provides an overview of the number of agreements on the IT franking of mail items entered into by DP AG and shows the respective refund using a standard letter as an example. The change in the refund from 2022 to 2023 is also shown.

¹³ DP AG, Terms and Conditions for the Order Management function, 1 October 2022, available (in German) at https://www.deutschepost.de/content/dam/dpag/images/E_e/Elektronisches%20Auftragsmanagement/dp-am-nutzungsbedingungen-funktion-am-de-102022.pdf

¹⁴ cf. IT franking: The advantages of a systematic approach, Information and notes on use. DP AG, March 2021

| Number of contracts | Refund for the IT franking of mail items in 2022 | Refund for the IT franking of mail items in 2023 | Change |
|---------------------|--|--|--------------|
| 6,098 | €0.009 | €0.009 | + - 0.000 ct |

Figure 9: Agreements on the IT franking of mail items (June 2023)

3.2 Contract for the use of a franking machine

Through a contract for the use of a franking machine, the DP AG customer acquires the right to frank letter-post items using a franking machine and receive a 1% refund.¹⁵ Unlike for IT franking, the use of a franking machine requires a minimum sale of €200 per transaction per franking machine.¹⁶ The mail items must be organised and also separated into standard, compact or large and maxi mail items.¹⁷

The following figure provides an overview of the number of orders for the use of a franking machine entered into by DP AG and shows the respective refund using a standard letter as an example. The change in the refund from 2022 to 2023 is also shown.

| Number of contracts | Refund for the use of a franking machine in 2022 | Refund for the use of a franking machine in 2023 | Change |
|---------------------|--|--|------------|
| 202,296 | €0.009 | €0.009 | + - 000 ct |

Figure 10: Contracts for the use of a franking machine (June 2023)

¹⁵ cf. General Terms and Conditions of Deutsche Post AG for the Franking of Mail Items Using Franking Machines

¹⁶ cf. DP AG, "Prices and Services", 1 July 2021, p. 41

¹⁷ cf. General Terms and Conditions of Deutsche Post AG for the Franking of Mail Items Using Franking Machines

3.3 Contract for outward/inward mail centre customer letter access services

Depending on their drop-off location, large volume mailers can enter into a contract for outward mail centre or inward mail centre access services. The contract enables large volume mailers – under certain conditions that must be complied with to prepare mail items for access services – to drop off letter-post items at DP AG.¹⁸

- **Pre-sorting and consecutive numbering**

The mail items must be pre-sorted according to the first two digits of the postcodes (routing region). The mail items must be consecutively numbered for each basic product (standard, compact, large, Maxi Letter).

- **Filling of letter mail trays**

The letter-post items must be deposited in trays provided by DP AG. They must be separated into type of basic product and into type of franking. There are also rules on when a tray is considered full.

- **Franking of mail items**

The franking types "IT franking" and "franking using franking machines" are permitted. Customers can also frank items themselves in line with the necessary agreements with DP AG or they can utilise DP AG's franking service.¹⁹

- **Machine-readability and sender's address**

The letter-post items must be machine-readable and the customer must be identified as the sender on the envelope.

- **Minimum volumes**

The minimum volumes can vary according to the basic product and type of drop-off (outward/inward mail centre). The minimum volume for the outward mail centre drop-off of standard or compact letters and postcards is 5,000 mail items or 500 large or Maxi Letter items. For inward mail centre drop-off, there is a minimum volume of 250 items for the basic products of standard or compact letters and postcards. The minimum volume of large and Maxi Letter items for inward mail centre drop-off is 100 mail items.

¹⁸ General Terms and Conditions of Deutsche Post for Access Services for the Conveyance of Letters for Customers (General Terms and Conditions for Letter Access Services)

¹⁹ See 3.1 and 3.2.

- **Drop-off documents**

Large volume mailers must use a certain document for dropping off letter-post items. The current drop-off documents are provided by DP AG at www.einlieferungslisten.de. The number of tray carts handed over is confirmed by DP AG when accepting letter-post items.

- **Miscellaneous**

Letter-post items are typically accepted at agreed times and must be received by a certain time for same-day forwarding. However, DP AG has no contractual obligation to adhere to certain delivery deadlines or periods.

- **Refunds**

For each basic product the contract for outward mail centre access services contains the quantity-based refund rates applicable at the time the access service contract was finalised. The requirements for the refunds are set out in DP AG's General Terms and Conditions for Letter Access Services. DP AG refers to the access service refunds as the "basic discount for access services". A uniform refund rate is used in contracts for inward mail centre access services upwards of a required minimum volume. The refund rates as from 1 July 2023 are shown in Figures 7 and 8. Furthermore, quantity-based scales and refund rates for the years 2014 to 2023 can be found in the Annex.²⁰ A refund is paid per drop off after deducting refunds already granted on the basis of agreed and implemented IT franking or franking using franking machines.

As from 1 January 2023 contracts for access services by outward/inward mail centres also contain refunds at the basic discount rate for access services. These include the ID discount (3%) and the delivery speed discount (also 3%). As from 1 October 2023 the delivery speed discount will only be given for the basic products standard, compact and large letters as well as postcards. According to DP AG, because of its low level of use on the market, machine processing of Maxi Letter items is currently not economically feasible, so the delivery speed discount for the Maxi Letter is no longer offered.

The ID discount is given on the condition that the franking ID of the dropped off mail items is transmitted electronically using DP AG's order management system. By using the order management system, upstream franking services are provided so the ID discount can be considered a replacement for the infrastructure services refund that was provided until the end of 2022. In addition, if the customer agrees to a delivery time of (normally) D+1-2 for the mail items entered into the system, then the delivery speed discount can be granted for these mail items. The electronic transmission of the franking ID is a necessary requirement for granting the delivery speed discount. This means that a delivery speed discount can only be provided for those mail items whose franking ID was electronically entered into the order management system. According to information provided by DP AG, around 50% of mail items are prepared for delivery on the same day that they are dropped off (D+1), and the rest are delivered one day later (D+2).²¹

²⁰ Information on the quantity-based scales and refund rates for the years 2010-2013 are available in the Report 2022 on the Terms and Conditions and Rates for Large Volume Mailers and Mail Consolidators on the Letters Market. The report can be downloaded at <https://www.bundesnetzagentur.de/DE/Fachthemen/Post/Teilleistungen/start.html>.

²¹ [Teilleistungen Brief | Deutsche Post](#)

DP AG's free "letter access services tracking" can be used in connection with the ID discount. The tracking service provides the customer with information on the status of their mail item as it is processed in the inward mail centre.²²

Using a standard letter as an example, the following figures provide an overview of the number of contracts for outward/inward mail centre access services entered into by DP AG and show the respective access service rates (including 1% franking machine/IT franking discount, not including ID or delivery speed discount) upwards of a drop-off volume of 25,001 or 250 mail items. The change in the access service rate from 2022 to 2023 is also shown.

| Number of contracts | Outward mail centre access service rate in 2022* | Outward mail centre access service rate in 2023* | Change |
|---------------------|--|--|----------|
| 1,201 | €0.476 | €0.501 | + €0.025 |

*for drop-off volumes upwards of 25,001 mail items

Figure 11: Contracts for outward mail centre customer letter access services (June 2023)

| Number of contracts | Inward mail centre access service rate in 2022* | Inward mail centre access service rate in 2023* | Change |
|---------------------|---|---|----------|
| 2,484 | €0.450 | €0.476 | + €0.026 |

*for drop-off volumes upwards of 250 mail items

Figure 12: Contracts for inward mail centre customer letter access services (June 2023)

3.4 Additional agreement to the contract for outward/inward mail centre customer letter access services

The additional agreement adds to the contract for access services for large volume mailers that the mail items of affiliated companies of the contracting party are also considered the large volume mailer's own mail items. The affiliated companies are listed in the annex to the additional agreement.

3.5 Contract for outward/inward mail centre letters commercial consolidation access services

If letter-post items are dropped off in the mail centre by a mail consolidator, other provisions are stipulated in the specific general terms and conditions in addition to the above terms and conditions and access service rates.²³ It should be noted that mail consolidators are the mailers and sole creditors of the services, but the senders are the customers of the mail consolidator. Large volumes of mail can arise when the letter-post items of several customers of the mail consolidator are consolidated.

²² [Letter access services tracking \(in German\) \(deutschepost.de\)](https://www.deutschepost.de)

²³ cf. General Terms and Conditions of Deutsche Post for Access Services for the Conveyance of Letters for Commercial Consolidation (General Terms and Conditions for Letter Access Services)

The other main provisions relate to:

- DP AG's right to assign a certain outward mail centre acceptance office if capacity at other acceptance offices is fully utilised
- the return of undeliverable letter-post items to the sender
- affixing a mail consolidator code to all envelopes

Using a standard letter as an example, the following figures provide an overview of the number of contracts for outward/inward mail centre commercial consolidation access services entered into by DP AG and show the respective access service rates upwards of a volume of 25,001 or 250 mail items. The change in the access service rate from 2022 to 2023 is also shown.

| Number of contracts | Outward mail centre access service rate in 2022* | Outward mail centre access service rate in 2023* | Change |
|---------------------|--|--|----------|
| 222 | €0.476 | €0.501 | + €0.025 |

*for drop-off volumes upwards of 25,001 mail items

Figure 13: Contracts for outward mail centre letter commercial consolidation access services (June 2023)

| Number of contracts | Inward mail centre access service rate in 2022* | Inward mail centre access service rate in 2023* | Change |
|---------------------|---|---|----------|
| 262 | €0.450 | €0.476 | + €0.026 |

*for drop-off volumes upwards of 250 mail items

Figure 14: Contracts for inward mail centre letter commercial consolidation access services (June 2023)

4 System of rates for access services

By entering into the above contracts/agreements (and by entering into Dialogpost access service contracts), large volume mailers and mail consolidators can receive refunds from DP AG on the postage to be paid for the respective basic product (standard, compact, large, Maxi Letters and postcards). As described above, the actual access service rate derives from the postage rate for the respective basic product less the refund amount achieved. At the contractual level, the access service rate covers the portion of the conveyance chain starting from the mail centre where items are dropped off to the addressee.

4.1 Refund scheme

The greatest possible reduction in access service rates is achieved when a contract for inward mail centre access services is entered into with DP AG and both the ID discount and the delivery speed discount are made use of for all dropped off mail items. Only if a normal delivery time of D+ 1-2 is reasonable for the DP AG's contracting party's items is the maximum refund also the optimal contractual arrangement for the said contracting party. The following figure shows the various contractual arrangements between DP AG and its contracting parties as well as the corresponding refund scheme. The contractual and billing relationships between the mail consolidator and the consignor are presented in more detail in Chapter 6. Various scenarios are possible. The large volume mailer makes a drop-off directly at the inward mail centre and thus performs all services itself (Scenario A). The consignor utilises the services of a mail consolidator but does its own franking (Scenario B). In the third scenario (Scenario C), the mail consolidator performs all services (including franking) for the consignor.

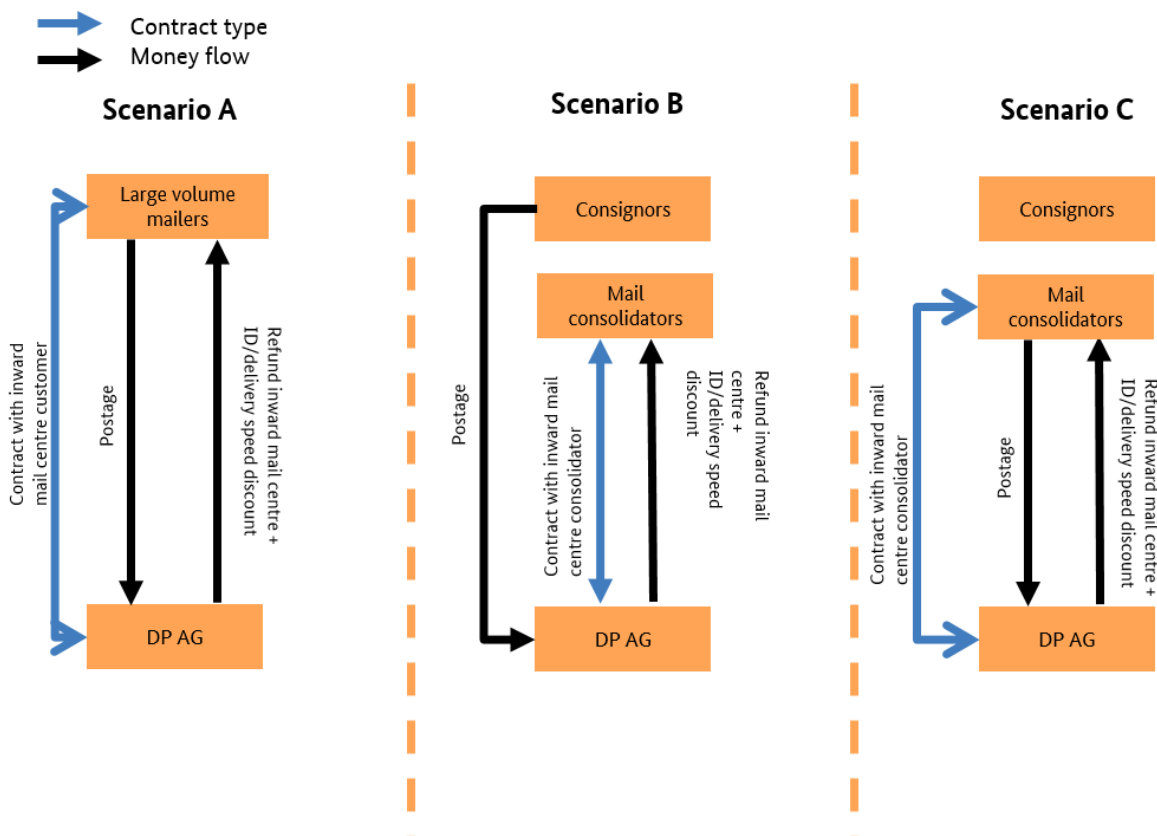


Figure 15: Refund scheme

In **Scenario A**, there is a direct contractual relationship with DP AG. For the maximum refund, the large volume mailer must enter into a "contract for inward mail centre access services" and fulfil the requirement for obtaining the ID discount and the delivery speed discount. The large volume mailer pays the letter postage directly to DP AG; after dropping off mail items it receives a refund from DP AG for the services it has performed to prepare mail items for access services and for franking. To receive the ID discount and the delivery speed discount, the large volume mailer must enter its dropped off items in the DP AG order management system.

If the consignor utilises the services of a mail consolidator and franks mail items itself (**Scenario B**), the consignor does not need a "contract for inward mail centre access services" because the mail consolidator will have entered into such a contract. For the maximum possible refund, the consignor must also fulfil the requirements for obtaining an ID discount and a delivery speed discount for all items. The consignor pays the letter postage because it franks the mail items. The mail consolidator collects the mail items from the consignor and bundles these with the mail items of other consignors. The mail consolidator then drops off the mail items at the DP AG mail centre. In Scenario B the consignor must create orders for the dropped off mail items in DP AG's order management system. The mail consolidator must then mark its drop-offs in DP AG's order management system by creating additional orders within the consignor's orders in the order management system. The processing of additional orders entails entering and assigning franking IDs for the ID discount and marking the mail items that will receive a delivery speed discount. Once the consignor and the mail consolidator have completed these steps, the mail consolidator receives the refund from DP AG.

If the mail consolidator handles the franking and the dropping off of mail items in the inward mail centre (**Scenario C**), it must also enter into a "contract for inward mail centre access services" with DP AG and fulfil the requirements for obtaining an ID discount and a delivery speed discount in order to get the maximum possible refund. The mail consolidator enters the dropped off mail items in DP AG's order management system (orders for dropped off mail and additional orders) and receives, like in Scenario B, the refunds from DP AG.

Independently of the contracts described above, each franker has also entered into an additional "agreement on IT franking of mail items" or a "contract for the use of a franking machine" with DP AG. However, this is irrelevant to the presentation of the refund scheme because the refund for franking services is already included in the "contract for inward mail centre access services".

4.2 System of rates

The system of rates can be derived from DP AG's contracts. Large volume mailers and mail consolidators are required to pay the letter postage for the respective basic product to DP AG. Depending on which upstream services are performed, DP AG refunds the large volume mailer or mail consolidator a portion (scaled according to the amount dropped off) of the letter postage. The access service rate is calculated as the difference between the letter postage and the respective refund.

The following figure shows the calculation of the access service rate (at maximum refund) for 2022 and 2023 using standard letters as an example. Both the refund rate (as a percentage) and the amount of the refund (in euro) are shown.

System of rates for access services

| | 2022 | | 2023 | |
|--|----------|----------|----------|----------|
| | Relative | Absolute | Relative | Absolute |
| Standard letter postage rate | 100% | €0.850 | 100% | €0.850 |
| Refund for performing infrastructure services | 5% | €0.043 | - | - |
| Refund for access services with outward mail centre drop-off | 44% | €0.374 | 41% | €0.349 |
| Additional refund for access services with inward mail centre drop-off | 3% | €0.026 | 3% | €0.026 |
| ID discount | - | - | 3% | €0.026 |
| Delivery speed discount | - | - | 3% | €0.026 |
| Maximum possible refund | 52% | €0.442 | 50% | €0.425 |
| Access service rate | 48% | €0.408 | 50% | €0.425 |

Figure 16: System of rates for access services with inward mail centre drop-off

In 2023 the maximum refund possible is achieved when a contract for inward mail centre access services has been entered into and when the maximum volume of mail is dropped off and the requirements for ID and delivery speed discount are fulfilled. The postage rate for a standard letter has been €0.85 since 1 January 2022. When mail items are dropped off at the outward mail centre, 41% of the letter postage (€0.349) is refunded for the upstream services performed. The contracting partner can be refunded an additional 3% of the letter postage (€0.026) for an inward mail centre drop-off. DP AG pays 3% of €0.85 (€0.026) for franking services performed including the electronic transmission of the mail item IDs (ID discount) and another 3% (also €0.026) when a normal delivery time of D+ 1-2 was agreed to. (delivery speed discount). The infrastructure services refund was discontinued as from 1 January 2023. As described above, it was replaced by the ID discount. In 2023 the maximum refund possible can amount to up to 50% (€0.425) of the postage rate. The access service rate for a standard letter is thus also €0.425.

The maximum refund possible in 2023 was smaller than in 2022. The drop is due to the fact that refunds for access services were decreased by three percentage points while at the same time the postage rate remained unchanged. Because the refunds that were newly introduced in 2023 (ID and delivery speed discounts) totalling 6% are higher than the 5% infrastructure services refund that was in effect in 2022, the maximum possible refund fell by just two percentage points from 52% to 50%.

5 Development of refund rates and access service rates at DP AG

Large volume mailers and mail consolidators have typically entered into a contract for inward mail centre access services and also a contract for outward mail centre access services. As described above, consignors with small mail volumes will contract a mail consolidator to drop off their mail items at DP AG in order to obtain the maximum possible refund on the postage rate since the refund is determined by the drop-off volume. The access service rate to be paid derives from the postage rate currently in effect for the respective basic product less the refund amount achieved.

5.1 Refund rates and refunds

The figure below shows the development of refund rates for outward and inward mail centre access services from 2014 to 2023 using standard letters as an example. Similar to what is shown in the Annex, 10-year reference periods are used to observe refund rate trends. Assessments of the time period before 2014 can be found in the older reports from 2020-2022.²⁴ In all of the following figures, the maximum possible drop-off volume is assumed, ie 25,001 mail items for outward mail centre drop-off and 250 mail items for inward mail centre drop-off.

Refund rates for outward/inward mail centre access services
in %

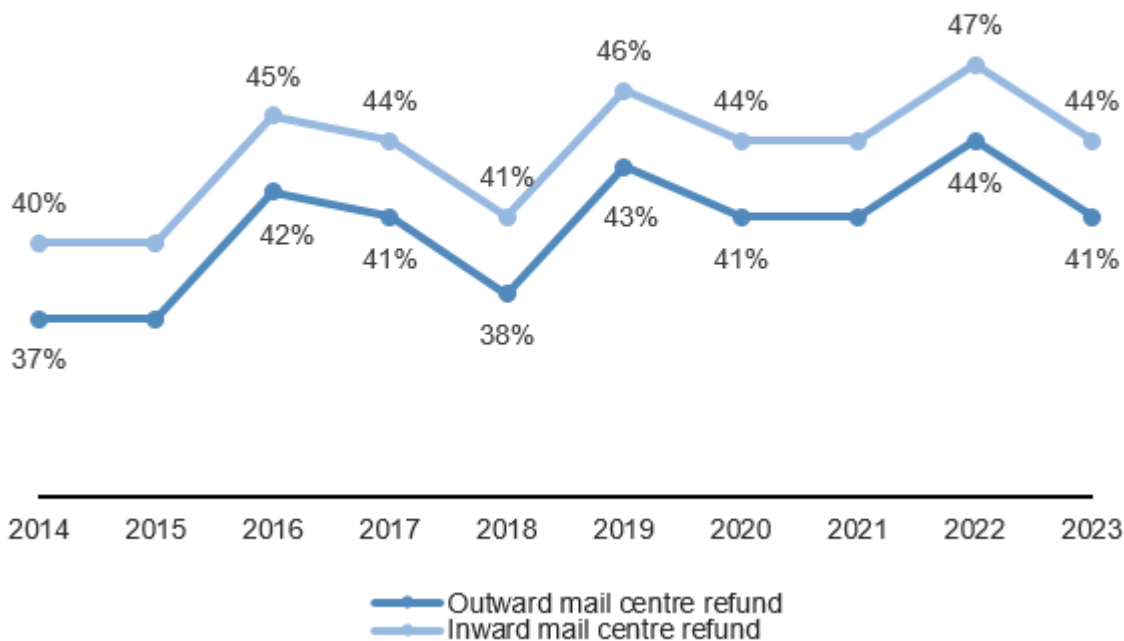


Figure 17: Refund rates since 2014

²⁴ Available at <https://www.bundesnetzagentur.de/DE/Fachthemen/Post/Teilleistungen/start.html>

Since 2014, refund rates have risen from 37% to 41% for outward mail centre access services and from 40% to 44% for inward mail centre access services. The developments in refund rates for outward mail centre access services and inward mail centre access services were parallel throughout.

The next figure shows the maximum possible refunds for outward/inward mail centre access services as an amount in euro and compares this to the respective postage rate.

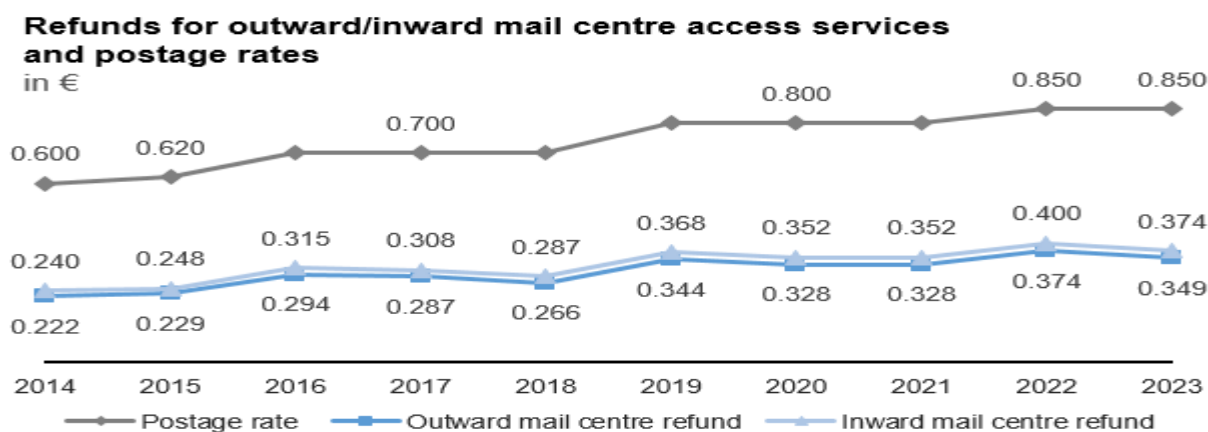


Figure 18: Refunds since 2014

Between 2014 and 2015, refunds for standard letters increased from €0.222 to €0.229 (outward mail centre) and from €0.240 to €0.248 (inward mail centre) even though the refund rates remained constant at 37% (outward mail centre) and 40% (inward mail centre). The change in the amount of the refund was in this case due to the gradual increase in the postage rate from €0.58 to €0.62. In 2016, the postage rate increased to €0.70 and the refund rates increased to 42% (outward mail centre) and 45% (inward mail centre). The resulting refunds amounted to €0.294 (outward mail centre) and €0.315 (inward mail centre). The refund rates were reduced between 2016 and 2018 and the achievable refunds fell to €0.266 (outward mail centre) and €0.287 (inward mail centre). In 2019 the postage rate was increased to €0.80 and the refund rates were simultaneously increased as well. The maximum possible refunds for access services were €0.344 (outward mail centre) and €0.368 (inward mail centre). DP AG lowered the refund rates in 2020 and left them unchanged on 1 January 2021. As a result of the increase in the postage rate compared with 2017, the refund rates of 41% (outward mail centre) and 44% (inward mail centre) meant maximum possible refunds of €0.328 (outward mail centre) and €0.352 (inward mail centre) in both 2020 and 2021. DP AG increased the postage rate for a standard letter to €0.85 as from 1 January 2022. At the same time, however, the refund rates were raised to 44% (outward mail centre) and 47% (inward mail centre). The maximum possible refunds in 2022 were thus €0.374 (outward mail centre) and €0.400 (inward mail centre). As from 1 July 2023 DP AG lowered the refunds rates (with no change to the postage rate) to 41% (outward mail centre) and 44% (inward mail centre). As a result the maximum possible refunds fell to €0.349 (outward mail centre) and €0.374 (inward mail centre).

The refund rates listed for outward mail centre and inward mail centre access services for all basic products since 2014 in Annexes 1 and 2 also show that DP AG changed the refund structure for the basic products of compact, large and Maxi Letters as well as postcards in 2019. Until 1 July 2019 there was a uniform scale in the refund rates per volume category for these basic products. In the period from 2014 to 2016, for example, the

scale stipulated refund rates of 20%, 23%, 27%, 31% and 35% for all stated basic products. By contrast, different scales have been used for each product since 1 July 2019. For instance, the refund rates for a compact letter in 2023 are 20%, 23%, 26%, 30% and 33%. For a large letter, however, the refund rates are 16%, 19%, 22%, 26% and 30%.

From 2018 to 2022 DP AG provided an extra refund of 3% for the performance of infrastructure services; the rate was increased to 5% in 2019. As from 1 January 2023 this refund was discontinued. Services related to franking are covered by the new ID discount (3%). In addition to this, the delivery speed discount (3%) was also introduced on 1 January 2023. It is applied when a normal delivery time of D+ 1-2 for mail items is agreed to.

5.2 Access service rates

The access service rate is the difference between the postage rate for the respective basic product and the refund rate valid for the period under review. Following on from the presentation of the development in refund rates and the refunds possible under 5.1, the development of the access service rates is shown analogously here.

As for the refunds, the figure below uses standard letters as an example to show the development in the postage rate and the development in access service rates (outward mail centre and inward mail centre) since 2014. Here, too, the maximum refund for outward/inward mail centre access services (maximum drop-off volume) is assumed.

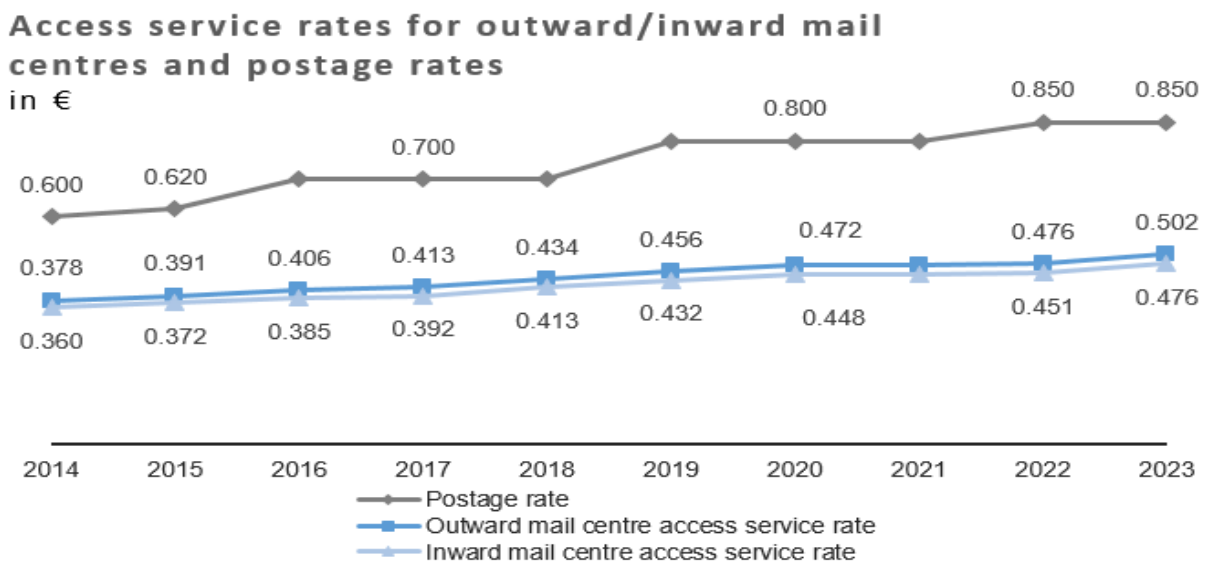


Figure 19: Outward mail centre and inward mail centre access service rates since 2014

The figure shows that outward and inward mail centre access service rates have been rising since 2014. As refunds have also generally risen since 2014, this increase has been partially offset by the increase in the postage rate, with the result that access service rates have risen overall.

Figure 19 above does not yet reflect the additional refunds referred to in 5.1. In 2018 there was a €0.021 (3%) refund for the performance of infrastructure services. This refund was increased to 5% (and thus €0.04) in the years 2019-2022. ID and delivery speed discounts, each at a rate of 3% or €0.026, have been available since 1 January 2023.

Using standard letters as an example, the following figure shows the outward and inward mail centre access service rates including these additional refunds. Thus the access service rates in the chart reflect the maximum refund.

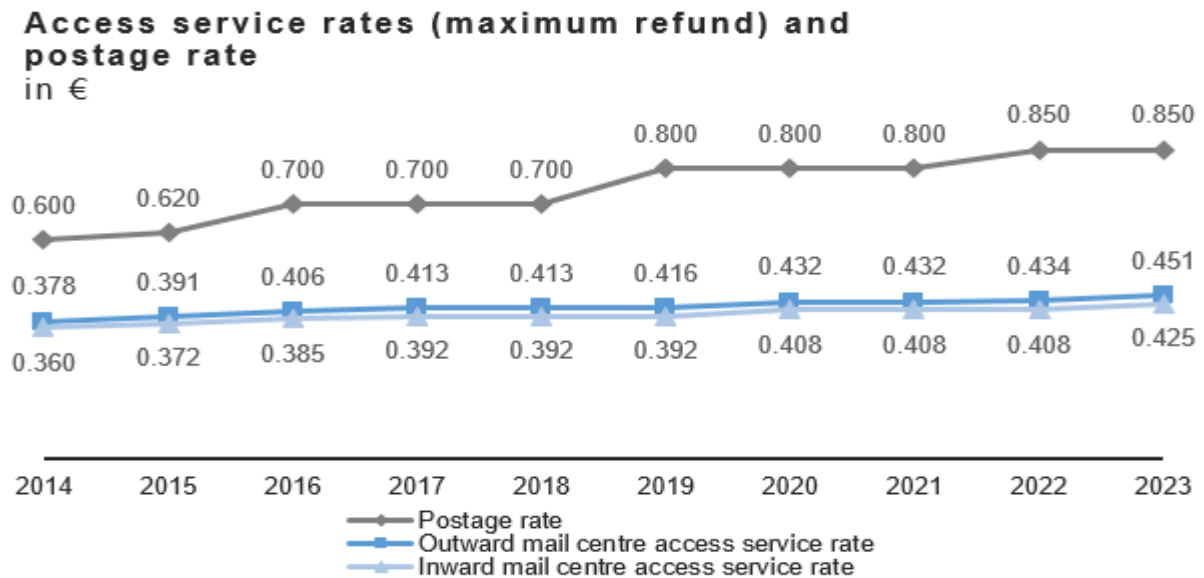


Figure 20: Access service rates (maximum refund) since 2014

Claiming the refund for infrastructure services actually should have led to lower access service rates in 2018. However, because the refund rates for outward and inward mail centre access services were reduced from 41% to 38% (outward mail centre) and from 44% to 41% (inward mail centre) at the same time that the refund was introduced, the introduction of the refund for infrastructure services allowed large volume mailers and mail consolidators to maintain the 2017 level for access service rates in 2018 when performing infrastructure services. These rates remained at €0.413 (outward mail centre) and €0.392 (inward mail centre). Without the introduction of the refund for infrastructure services, access service rates would have already risen in 2018. The postage rate was raised in 2019, and at the same time the refund rates for outward and inward mail centre access services and the refund rate for infrastructure services were also raised. Overall this resulted in the inward mail centre access service rate remaining stable at €0.392, while the outward mail centre access service rate increased marginally to €0.416. The access service rates were raised again to €0.432 (outward mail centre) and €0.408 (inward mail centre) in 2020. Consignors that do not participate in the performance of infrastructure services continued in 2020 to pay the higher access service rate shown in Figure 21, namely €0.472 (outward mail centre) and €0.448 (inward mail centre). There were no changes in access service rates in 2021. Both the postage rate and the refund rates for outward and inward mail centre access services were raised in 2022, while the refund rate for infrastructure services was unchanged at 5%. Overall this resulted in the access service rates, including the refund for infrastructure services, remaining virtually unchanged. The change in outward mail centre access services occurred in the third decimal place, with the rounded figure the same as in 2021 (€0.43). In 2023 the access service rates increased to €0.451 (outward mail centre) and €0.425 (inward mail centre), even taking into account the newly introduced ID and delivery speed discounts. This is due to the fact that refund rates for access services (inward and outward) were decreased by three percentage points while at the same time the postage rate remained unchanged. The increase in this case is mitigated by the fact that the sum of the ID discount and the delivery speed discount (6%) is more than the refund for infrastructure services (5%) that was still in place in 2022.

The following figure also shows the access service rates for the period 2014 to 2023 for all basic products of DP AG if the maximum refund is achieved. Refunds for the performance of infrastructure services in the period from 2018 to 2022 are shown in the chart. For 2023 the ID and delivery speed discounts are shown.

The figure also demonstrates an upward trend in access service rates for all basic products between 2014 and 2023. The causes of the changes in values since 2014 cannot be explained conclusively. For the change from 2018 to 2019, it is presumed that the adjustment of refund rates for the respective basic product was intended to ensure a consistent access service rate when simultaneously performing infrastructure services. The setting of the postage rate (in line with benchmarks set by the Bundesnetzagentur) and the refund rates, and thus the access service rates, are business decisions by DP AG. Neither the PostG nor the German Postal Rates Regulation Ordinance (PEntgV) contain any regulations specifying refunds or access service rates beyond section 20 PostG. Rate trends from recent years at least provide no basis to conclude that DP AG uses a specific system for determining these amounts.

| Access service rates at maximum refund from 2014 to 2023 in € | | | | | | | | | | |
|--|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 |
| Standard letter | 0.600 | 0.620 | 0.700 | 0.700 | 0.700 | 0.800 | 0.800 | 0.800 | 0.850 | 0.850 |
| Rate for outward mail centre access service | 0.378 | 0.391 | 0.406 | 0.413 | 0.434 | 0.456 | 0.472 | 0.472 | 0.476 | 0.502 |
| Rate for inward mail centre access service | 0.360 | 0.372 | 0.385 | 0.392 | 0.413 | 0.432 | 0.448 | 0.448 | 0.451 | 0.476 |
| Rate for outward mail centre access service including infrastructure service (2018-2022) | | | | | 0.413 | 0.416 | 0.432 | 0.432 | 0.434 | |
| Rate for inward mail centre access service including infrastructure service (2018-2022) | | | | | 0.392 | 0.392 | 0.408 | 0.408 | 0.408 | |
| Rate for outward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.451 |
| Rate for inward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.425 |
| Compact letter | 0.900 | 0.850 | 0.850 | 0.850 | 0.850 | 0.950 | 0.950 | 0.950 | 1.000 | 1.000 |
| Rate for outward mail centre access service | 0.585 | 0.553 | 0.553 | 0.561 | 0.587 | 0.618 | 0.637 | 0.637 | 0.640 | 0.670 |
| Rate for inward mail centre access service | 0.558 | 0.527 | 0.527 | 0.536 | 0.562 | 0.590 | 0.608 | 0.608 | 0.610 | 0.640 |
| Rate for outward mail centre access service including infrastructure service (2018-2022) | | | | | 0.561 | 0.570 | 0.589 | 0.589 | 0.590 | |
| Rate for inward mail centre access service including infrastructure service (2018-2022) | | | | | 0.536 | 0.542 | 0.561 | 0.561 | 0.560 | |
| Rate for outward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.610 |
| Rate for inward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.580 |
| Large letter | 1.450 | 1.450 | 1.450 | 1.450 | 1.450 | 1.550 | 1.550 | 1.550 | 1.600 | 1.600 |
| Rate for outward mail centre access service | 0.943 | 0.943 | 0.943 | 0.957 | 1.001 | 1.039 | 1.070 | 1.070 | 1.072 | 1.120 |
| Rate for inward mail centre access service | 0.899 | 0.899 | 0.899 | 0.914 | 0.957 | 0.992 | 1.023 | 1.023 | 1.024 | 1.072 |
| Rate for outward mail centre access service including infrastructure service (2018-2022) | | | | | 0.957 | 0.961 | 0.992 | 0.992 | 0.992 | |
| Rate for inward mail centre access service including infrastructure service (2018-2022) | | | | | 0.914 | 0.915 | 0.946 | 0.946 | 0.944 | |
| Rate for outward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 1.024 |
| Rate for inward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.976 |
| Maxi Letter | 2.400 | 2.400 | 2.600 | 2.600 | 2.600 | 2.700 | 2.700 | 2.700 | 2.750 | 2.750 |
| Rate for outward mail centre access service | 1.560 | 1.560 | 1.690 | 1.716 | 1.794 | 1.863 | 1.917 | 1.917 | 1.925 | 2.008 |
| Rate for inward mail centre access service | 1.488 | 1.488 | 1.612 | 1.638 | 1.716 | 1.782 | 1.836 | 1.836 | 1.843 | 1.925 |
| Rate for outward mail centre access service including infrastructure service (2018-2022) | | | | | 1.716 | 1.728 | 1.782 | 1.782 | 1.788 | |
| Rate for inward mail centre access service including infrastructure service (2018-2022) | | | | | 1.638 | 1.647 | 1.701 | 1.701 | 1.705 | |
| Rate for outward mail centre access service including ID discount | | | | | | | | | | 1.925 |
| Rate for inward mail centre access service including ID discount | | | | | | | | | | 1.843 |
| Postcard | 0.450 | 0.450 | 0.450 | 0.450 | 0.450 | 0.600 | 0.600 | 0.600 | 0.700 | 0.700 |
| Rate for outward mail centre access service | 0.293 | 0.293 | 0.293 | 0.297 | 0.311 | 0.342 | 0.354 | 0.354 | 0.364 | 0.385 |
| Rate for inward mail centre access service | 0.279 | 0.279 | 0.279 | 0.284 | 0.297 | 0.324 | 0.336 | 0.336 | 0.343 | 0.364 |
| Rate for outward mail centre access service including infrastructure service (2018-2022) | | | | | 0.297 | 0.312 | 0.324 | 0.324 | 0.329 | |
| Rate for inward mail centre access service including infrastructure service (2018-2022) | | | | | 0.284 | 0.294 | 0.306 | 0.306 | 0.308 | |
| Rate for outward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.343 |
| Rate for inward mail centre access service including ID and delivery speed discounts | | | | | | | | | | 0.322 |

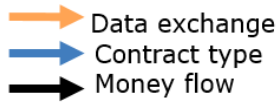
Figure 21: Access service rates since 2014

6 Overview of providers for the performance of access services (mail consolidators)

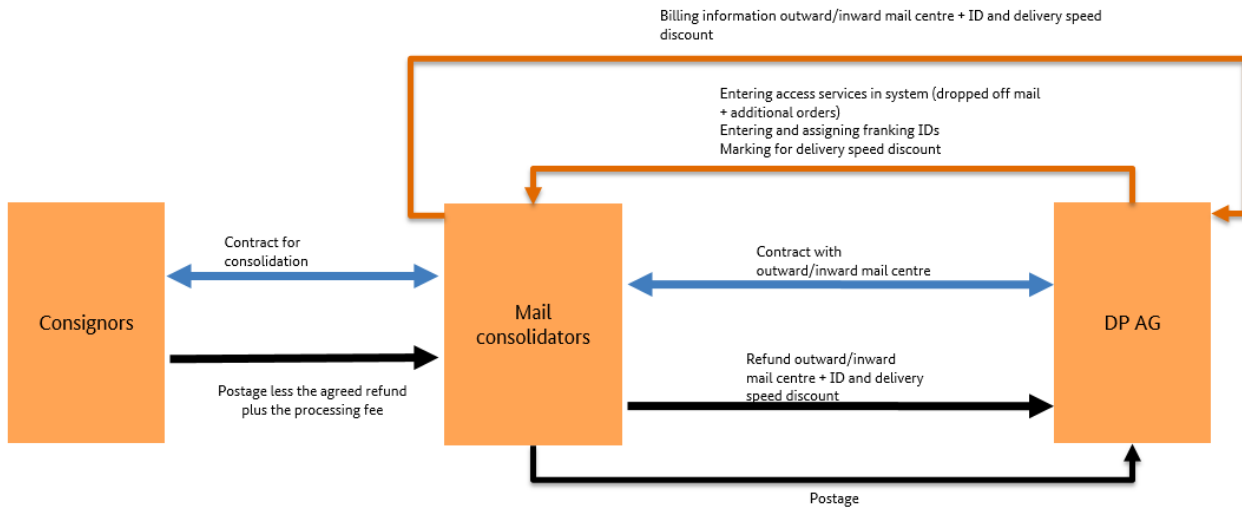
In addition to a direct drop-off of mail items ready for access services at DP AG, there is also the option of utilising the services of a mail consolidator. Mail consolidators collate the mail items of various consignors and prepare them for access services. Mail consolidators offer to provide their customers all upstream services so that customers (even those with small mail volumes) can have their mail items prepared for access services and the minimum volumes for obtaining the refund can be achieved. If the mail consolidator has a large customer base with a consistent overall volume of mail items and the volumes are regularly sufficient for the maximum refund, individual consignors can also regularly achieve higher refund rates.

Generally a processing fee is paid to the mail consolidator for preparing items for access services. The processing fee is based on the services to be performed by the mail consolidator. Possible mail consolidator services can include franking, sorting, numbering, collation of mail items with those of other consignors, dropping off mail items in the DP AG letter-mail centre and using the order management system to get the ID and delivery speed discounts.

The figure below shows possible contractual arrangements for mail consolidation. It also shows what the payment flows between mail consolidators, consignors and DP AG look like and how data streams flow between the parties. There are two different scenarios. In Scenario A the mail consolidator performs all services including franking, and in Scenario B the consignor franks its mail items itself.



Scenario A: Mail consolidator performs all services for the consignors



Scenario B: Consolidation with franking by the consignor

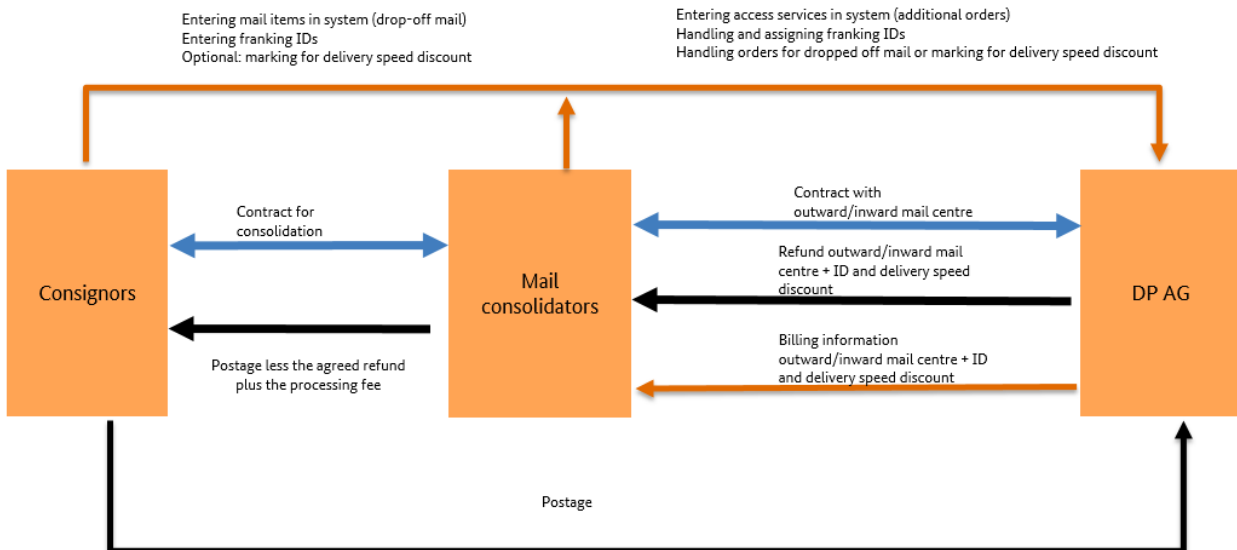


Figure 22: Contract structure, data and payment flows

In **Scenario A "consolidator performs all services for the consignor"** all direct contractual relationships are solely between DP AG and the mail consolidator (contracts for outward/inward mail centre access services). Because the mail consolidator handles the franking of the mail items, it pays the postage for the mail items to DP AG. To fulfil the requirements for the ID and delivery speed discounts, the mail consolidator creates the orders it is required to enter in the order management system (dropped off mail and additional orders) for the mail items to be dropped off at DP AG. The consolidator enters and assigns the franking IDs and marks the mail items that will receive a delivery speed discount. The consolidator drops off the mail items at the DP AG

letter-mail centre according to the terms and conditions of the contract for outward/inward mail centre access services. DP AG pays the mail consolidator the refund for outward/inward mail centre drop-off of mail items ready for access services and for the ID and delivery speed discounts. DP AG also provides the consolidator with the billing information for these refunds.

As is the case in Scenario A, all contractual relationships in **Scenario B "consolidation with franking performed by the consignor"** are between DP AG and the mail consolidator (contracts for outward/inward mail centre access services). Because consignors frank the mail items themselves, they pay the postage for these mail items to DP AG. The franked mail items are handed over to the mail consolidator. To fulfil the requirements for the ID and delivery speed discounts, consignors create an order in the DP AG order management system and enter the franking IDs. They can also mark the mail items that will receive a delivery speed discount. The mail consolidator must then add additional orders to the orders in the order management system. The franking IDs created by the consignors are accepted and assigned. If the consignor has marked the dropped off mail items for the delivery speed discount, then the consolidator accepts the marking, otherwise the consolidator must mark the items itself for the delivery speed discount. The mail items are then dropped off by the mail consolidator at the DP AG mail centre in line with the requirements of the contract for outward/inward mail centre access services. DP AG pays the mail consolidator the refund for the contract for outward/inward mail centre access services for the mail items dropped off, including the ID and delivery speed discounts. For the ID and delivery speed discounts only the information in the additional order is relevant. The mail consolidator passes this refund on, less a processing fee for the services it has performed, to the consignor. DP AG also provides the consolidator with the billing information.

The mail consolidator (Scenario A) and the consignor (Scenario B) have also entered into an additional "agreement on the IT franking of mail items" or a "contract for the use of a franking machine" with DP AG. As the refund for franking services is already taken into account in the contract for outward/inward mail centre access services, the contract does not have to be presented separately.

Postal service providers that offer mail consolidation can offer delivery independent of their range (local, regional or national). Local or regional delivery is carried out by the respective postal service provider itself if this is a service that it provides. Alternatively, for regional delivery, a "contract for inward mail centre letter commercial consolidation access services" allows the option of delivery through the DP AG network. For national delivery of mail items, the cooperative networks of mail alliance or P2 Die zweite Post can be used, or they can be delivered by DP AG under a "contract for outward mail centre letter commercial consolidation access services". In total there are 209²⁵ mail consolidators that utilise regional delivery by DP AG and 245²⁶ mail consolidators that provide national delivery through the DP AG network. The DP AG network also guarantees the coverage of regions not covered by the cooperative networks of mail alliance and P2 Die zweite Post. Thus national delivery is assured regardless of the postal service provider or the respective network.

²⁵ Number of contracts for outward mail centre commercial consolidation access services

²⁶ Number of contracts for inward mail centre commercial consolidation access services

The largest postal operators that also offer consolidation are FP freesort and Deutsche Post InHaus Services GmbH. The special feature of the market for letter-post items is that the company operating the nationwide postal network also competes on the postal market as a mail consolidator.

7 Contracts for access services of DP IHS and Compador

In addition to DP AG, other companies must also present the access service contracts they have entered into to the Bundesnetzagentur. These are Deutsche Post InHaus Services GmbH (DP IHS) and, for the period until July 2018, Compador Dienstleistungs GmbH (Compador) as well. These two companies, Compador at least for a time, share DP AG's dominant market position and they are therefore required under section 30 PostG to present their access service contracts in accordance with section 28 PostG. The report from 2020 contains more detailed information on Compador's access service contracts as well as an analysis of remuneration as at 1 January 2018.²⁷ The scope of the services listed there may have changed in the meantime. The Bundesnetzagentur does not have copies of current Compador contracts because they no longer have to be submitted under section 30 PostG.

7.1 Deutsche Post InHaus Services GmbH

DP IHS has been operating in the segment of the letters market subject to licence since 1999. Having formerly traded as Williams Lea InHouse Solutions GmbH, the company has been a wholly owned subsidiary of the DP AG Group since 2007.

The Bundesnetzagentur's review of the contracts submitted by DP IHS was intended to establish whether the rates for the performance of the consolidation service by DP IHS, in other words the service charges described above, are compatible with the standards of the PostG.

7.1.1 Scope of services of the DP IHS access service contracts

In accordance with the General Terms and Conditions attached to the access service contracts as an annex (General Terms and Conditions of DP IHS, January 2023), DP IHS performs the services described below for its customers. The General Terms and Conditions have been published on DP IHS's website.

If it has been contractually agreed with the customer, DP IHS collects the customer's mail items that are and are not ready for access services in the trays provided by DP IHS. The collection takes place at the location stipulated in the contract within the time period also contractually agreed (section 2(1) of DP IHS's General Terms and Conditions). Letter-post items ready for access services within the meaning of DP IHS's General Terms and Conditions are the products standard, compact, large, Maxi Letter and postcards that are machine-readable, for which postage has been properly paid and that are addressed exclusively to addressees in Germany (section 1(4)). Letter-post items not qualifying for access services are other mail items, such as mail items with a handwritten address or franked with stamps, books or goods, parcels, packages as well as registered mail items or cash on delivery mail items (section 1(5)). Unless stated otherwise, DP AG's General Terms and Conditions for BRIEF NATIONAL (BRIEF NATIONAL General Terms and Conditions) and the "Prices and Services" brochure apply as currently amended. If the customer does not utilise the collection of mail items by DP IHS, the customer drops off its mail items (items that are ready and items that are not ready for access services) at the specified DP IHS service centre within the agreed time slot. The mail items must be franked by the customer in advance with the full postage rate for the respective basic product by way of

²⁷ Available at <https://www.bundesnetzagentur.de/DE/Fachthemen/Post/Teilleistungen/start.html>

sender franking or IT franking unless franking by DP IHS has been contractually agreed with the customer (section 3(5) of DP IHS's General Terms and Conditions).

DP IHS consolidates the customer's letter-post items that are ready for access services with other customers' letter-post items that are ready for access services (section 2(3) of DP IHS's General Terms and Conditions). The outgoing mail is sorted and numbered by DP IHS (by routing region). It is not explicitly stated in the contract or in the General Terms and Conditions that mail items are sorted by routing region, but this is a requirement for the drop-off of mail items at DP AG. DP IHS then drops off the mail items at the DP AG mail centre. Unless contractually agreed otherwise, DP IHS drops off the mail items on the day of collection at DP AG for forwarding and delivery (section 2(6) of DP IHS's General Terms and Conditions).

Each month DP IHS provides the customer with documentation of the letter-post items dropped off at DP AG that were ready for access services and not ready for access services. The documentation of the mail items ready for access services forms the basis for payment of the access service rates (section 2(8) of DP IHS's General Terms and Conditions).

7.1.2 Remuneration model

The access service contracts presented show that DP IHS uses two different remuneration arrangements.

Remuneration arrangement 1

Under this remuneration arrangement DP IHS agrees to a payment amount per item stipulated in the contract for the processing and dropping off of mail items ready for access services per basic product. This is referred to in the following chapter as the "consolidation rate". If the customer has agreed to the collection of mail items by DP IHS, then a transport fee that is stipulated in the contract must also be paid to DP IHS. If DP IHS assumes the franking of mail items, the amount per item stated in the contract per basic product must also be paid. This is referred to below as the "franking rate". On a one-off basis DP IHS charges the amount stated in the contract for the creation of a personalised franking design.

This arrangement results in a refund scheme (also described in the contract) whereby DP IHS receives a refund from DP AG for the mail items dropped off at DP AG that were ready for access services. DP IHS passes this refund on to its customers after first deducting the agreed remuneration. The remuneration amount to be deducted from the refund depends on which DP IHS services the customer actually uses.

If the overall total of mail items dropped off by all customers per product amounts to less than the volume required (for outward mail centre drop-off) to generate the maximum possible refund for a given day, the refunds for this day are reduced as per contract. If the overall total of mail items dropped off by all customers is less than the required number of inward mail centre-compliant mail items per product per day, the refunds for this day are cancelled entirely as per contract. Furthermore, if DP IHS itself receives no or reduced refunds from DP AG in conjunction with its access service contract with DP AG for reasons for which it is not responsible, the refund to customers will be reduced proportionally in accordance with section 4 of DP IHS's General Terms and Conditions.

Remuneration arrangement 2

DP IHS agrees to a fixed price (per item) with its customers for each basic product. The fixed price depends on the applicable letter price and the DP AG refunds.

This arrangement results in a refund scheme (also described in the contract) whereby, depending on the franking service performed by DP IHS, mail flows are either calculated at the agreed fixed price (for franking by DP IHS) or the difference between the agreed fixed price and the DP AG postage rate is credited (if the customer franks items in advance).

For both remuneration options, DP IHS is authorised to amend the remuneration for the processing, drop-off, transport or franking of mail items accordingly if the necessary wage or purchasing costs for transport services necessary for the contractual performance change. This arrangement, which was exclusively contained in the contracts until the General Terms and Conditions were updated in November 2020, has now also been included in section 4(3) of DP HIS's General Terms and Conditions.

7.1.3 Analysis of contracts

In conjunction with the review of contracts including the associated contract adjustments, the amount of the agreed remuneration was looked at in more detail for both of the remuneration arrangements presented.

The figures below show the average consolidation and franking rates (remuneration option 1) and fixed rates (remuneration option 2) for the letter formats of standard letter, compact letter, large letter and Maxi Letter as well as for postcards. The remuneration is shown separately by outward and inward mail centre drop-off.

For the consolidation rate (remuneration option 1), for example, the average rates for outward and inward mail centre drop-off for a standard letter in 2023, as shown in the figure below, were €0.032.

| Average DP IHS consolidation rates | | | | |
|---|-------------|-------------|-------------|-------------|
| | 2020 | 2021 | 2022 | 2023 |
| Standard letter outward mail centre | €0.027 | €0.028 | €0.031 | €0.032 |
| Compact letter outward mail centre | €0.029 | €0.030 | €0.034 | €0.035 |
| Large letter outward mail centre | €0.061 | €0.063 | €0.067 | €0.075 |
| Maxi Letter outward mail centre | €0.109 | €0.115 | €0.121 | €0.139 |
| Postcard outward mail centre | €0.014 | €0.022 | €0.024 | €0.017 |
| Standard letter inward mail centre | €0.031 | €0.031 | €0.033 | €0.032 |
| Compact letter inward mail centre | €0.034 | €0.034 | €0.036 | €0.035 |
| Large letter inward mail centre | €0.059 | €0.060 | €0.067 | €0.073 |
| Maxi Letter inward mail centre | €0.090 | €0.110 | €0.119 | €0.135 |
| Postcard inward mail centre | - | €0.018 | €0.025 | €0.018 |

Figure 23: Average DP IHS consolidation rates 2020-2023

For example, the average franking rate (option 1) for a standard letter in 2023 was €0.024. The average franking rates for all basic products are shown in the following figure.

Average DP IHS franking rates

| | 2020 | 2021 | 2022 | 2023 |
|-----------------|--------|--------|--------|--------|
| Standard letter | €0.021 | €0.022 | €0.022 | €0.023 |
| Compact letter | €0.022 | €0.022 | €0.022 | €0.024 |
| Large letter | €0.043 | €0.043 | €0.045 | €0.053 |
| Maxi Letter | €0.064 | €0.066 | €0.070 | €0.092 |
| Postcard | €0.041 | €0.044 | €0.038 | €0.018 |

Figure 24: Average DP IHS franking rates 2020-2023

For example, the average prices for the agreed fixed price (remuneration arrangement 2) for a standard letter were €0.549 (outward mail centre) and €0.523 (inward mail centre) in 2023. The average fixed prices for all basic products are shown in the following figure.

Average DP IHS fixed prices

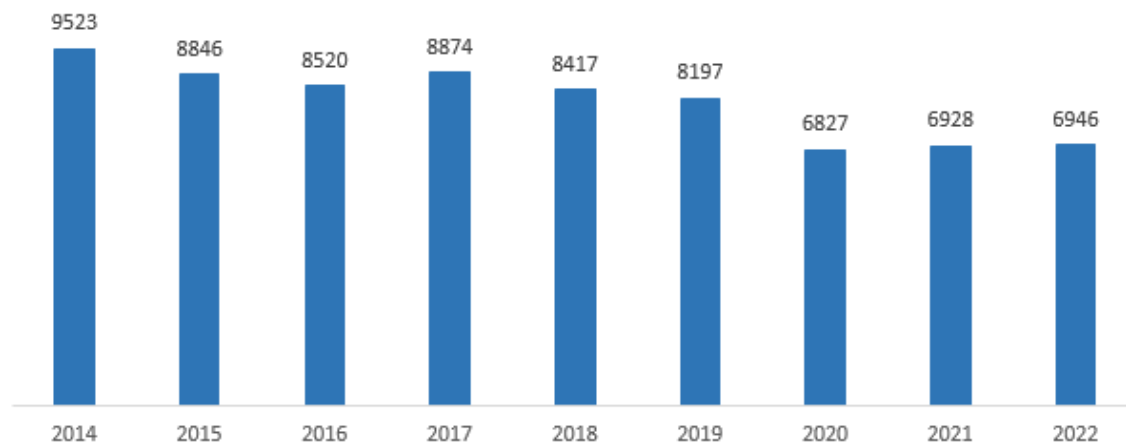
| | 2020 | 2021 | 2022 | 2023 |
|-------------------------------------|--------|--------|--------|--------|
| Standard letter outward mail centre | €0.530 | €0.532 | €0.530 | €0.549 |
| Compact letter outward mail centre | €0.707 | €0.713 | €0.710 | €0.736 |
| Large letter outward mail centre | €1.154 | €1.160 | €1.157 | €1.201 |
| Maxi Letter outward mail centre | €2.258 | €2.344 | €2.412 | €2.270 |
| Postcard outward mail centre | €0.608 | – | €0.706 | |
| Standard letter inward mail centre | €0.508 | €0.510 | €0.507 | €0.523 |
| Compact letter inward mail centre | €0.697 | €0.700 | €0.695 | €0.719 |
| Large letter inward mail centre | €1.104 | €1.107 | €1.125 | €1.162 |
| Maxi Letter inward mail centre | €2.860 | – | €2.373 | €2.268 |
| Postcard inward mail centre | €0.600 | – | €0.706 | |

Figure 25: Average DP IHS fixed prices 2020-2023

8 Access services for Dialogpost

According to DP AG, Dialogpost is for mail items consisting solely of advertising content. This can include, for example, mailouts with free samples, promotions or customer magazines. The Infopost decision BK5a-11/024 of Ruling Chamber 5 of the Bundesnetzagentur and a legal decision by the Cologne Administrative Court resulted in new terms and conditions for Dialogpost from 1 January 2020, with the result that sales merchandise, payment requests, recalls and invitations to general assemblies of members, for example, no longer count as Dialogpost. The following figure shows the Dialogpost sent from 2014 to 2022.

Dialogpost sent
2014- 2022 in mn



Source: Statbook DPAG

Figure 26: Dialogpost sent 2014-2022 (millions)

Dialogpost dispatches are in decline overall. The volume of Dialogpost has fallen by 27.06% since 2014. This may be due to the fact that Dialogpost content is increasingly sent to customers electronically and the 2020 redefinition that limited the content of Dialogpost. DP AG attributes the increase in 2017 to communication in the run-up to the elections.²⁸ According to DP AG, the moderate increases in 2021 and 2022 were due to the development compared to that of the previous year during lockdown when there was a reduction in advertising content, especially for retail.²⁹

In addition to the content requirements, there are other conditions for Dialogpost as well. Items sent as Dialogpost must have the same sender, the same address inside and outside (address on the envelope and address on the letter), the same envelope size, the same franking within a drop-off and the same basic format.³⁰

Minimum volumes per drop-off must also be complied with to use the Dialogpost service. These are shown in the following figure together with the terms and conditions for sorting.

²⁸ cf. DPDHL 2017 Annual Report, p. 63

²⁹ cf. DPDHL 2021 Annual Report, p. 38 and DPDHL Annual Report 2022, p. 39

³⁰ Deviations within the basic format up to max. 30 mm in length and width are permitted.

| Minimum volumes and sorting | | |
|------------------------------------|-----------------|--|
| Volume | Name | Region |
| 5,000 | Dialogpost | nationwide |
| 200 | DIALOGPOST | for the same routing region |
| 500 | Dialogpost Easy | nationwide (with small-volume surcharge) |

Source: DPAG, Dialogpost brochure

Figure 27: Minimum volumes and sorting

If the minimum volumes are not achieved, the cost of the deficit volumes can be added on accordingly. This is based on the net mail rate (rate for the individual mail items). If the mail items are sorted by postcode, this must be done for the entire drop-off volume (for all trays).

Another condition for sending Dialogpost is the letter format. Only standard or large format are available. The dimensions of these are shown below.

| Dimensions and weights | | | | | |
|-------------------------------|---------------|--------------|------------------|---------------|--------------|
| Basic format | Length | Width | Thickness | Weight | Shape |
| Standard | 150-235 mm | 90-125 mm | up to 5 mm | up to 50 g | Rectangular |
| Large | 140-353 mm | 90-250 mm | up to 30 mm | up to 1,000 g | Rectangular |

Source: DPAG, Dialogpost brochure

Figure 28: Dialogpost dimensions and weights

The standard format also includes postcards on which all the information is visible externally. This does not include double postcards. The length must be at least 1.4 times the width. Large format also includes unenclosed mail items (eg a catalogue). A square shape is also possible, the sides of which must be at least 140 mm. A production surcharge is added if the dimensions and shapes of the mail items deviate from the basic formats within pre-set limits or for mail items with no straight outer edge as these cannot be automated.

8.1 Contracts for Dialogpost access services

Customers and mail consolidators can drop off Dialogpost mail items ready for access services at DP AG bulk mail acceptance offices in inward mail centres. The basis for this is formed by the General Terms and Conditions for Dialogpost Inward Mail Centre Customer Access Services, the General Terms and Conditions for Dialogpost Inward Mail Centre Consolidation Access Services and the General Terms and Conditions for BRIEF NATIONAL, the Prices and Services brochure and the National Dialogpost brochure.

Generally the addressees' addresses must be in Germany. Certain conditions must be complied with for the drop-off of Dialogpost mail items for access services, such as the use of DP AG drop-off lists and trays.

Items are accepted at the respective bulk mail acceptance office from Monday to Friday until at least one hour before the acceptance office closes. Adherence to a certain delivery time by DP AG is not guaranteed, though

the mail items are delivered in line with DP AG’s general quality standards.³¹ Other conditions must be complied with in addition to using DP AG posting lists and containers. A comparison of these with the contracts for inward mail centre customer letter access services is shown below. The conditions relate to pre-sorting, filling, franking, automation capability, minimum volumes and drop-off documents. If these conditions are met, in addition to the discounts agreed in the Dialogpost contracts entered into, further refunds on the postage charges for Dialogpost can be generated from access service contracts for Dialogpost. The refund is issued within two weeks.

| <u>Contract: access service rates for inward mail centre customer letter</u> | <u>Product</u> | <u>Access service rates under Dialogpost contracts</u> |
|--|---|---|
| <ul style="list-style-type: none"> • all basic products | | <ul style="list-style-type: none"> • only standard- and large format |
| <ul style="list-style-type: none"> • by routing region • sequential numbering | Pre-sorting and consecutive numbering | <ul style="list-style-type: none"> • by routing region • sequential numbering • additional postcode sorting within the routing region |
| <ul style="list-style-type: none"> • use of DP AG trays • separated by type of basic product and type of franking • Definition of full tray | Filling of letter mail trays | <ul style="list-style-type: none"> • use of DP AG trays • items uniformly arranged • maximum weight 10 kg |
| <ul style="list-style-type: none"> • types of franking IT franking and franking using franking machines • franking can be done by customer | Franking of mail items | <ul style="list-style-type: none"> • franking wave, shortened franking mark, customer's customised graphic (as franking mark or in connection with IT franking) • IT franking, franking machine (only base price) |
| <ul style="list-style-type: none"> • machine readable • customer must be recognisable as sender | Machine-readability and sender's address | <ul style="list-style-type: none"> • machine readable • address side suitable for automation • standard up to 20 g: machine-handleable • customer recognisable as sender |
| <ul style="list-style-type: none"> • 250 standard and compact letter • 100 large and Maxi Letter | Minimum volumes | <ul style="list-style-type: none"> • 200 standard and large letter • upwards of 250 3% refund |
| <ul style="list-style-type: none"> • drop-off documents can be downloaded online | Drop-off documents | <ul style="list-style-type: none"> • drop-off documents can be downloaded online |

Figure 29: Comparison of access service rates for inward mail centre customer letter and access service rates under Dialogpost contracts

A Dialogpost contract can be entered into in order to allow the option of dropping off Dialogpost that is ready for access services. The contract options for this access service are shown below.

8.1.1 Contract for Dialogpost inward mail centre customer access services

Customers must enter into a contract for Dialogpost inward mail centre customer access services with DP AG in order to generate refunds on the postage rate for Dialogpost. The requirements to prepare Dialogpost mail items for access services can be found in the comparison in the above figure.

³¹ cf. Dialogpost National brochure, p. 39

The following figure provides an overview of the number of Dialogpost inward mail centre customer contracts entered into by DP AG and shows the respective refund using a standard Dialogpost letter up to 20 g as an example. The change in the refund from 2021 to 2022 is also shown.

| Number of contracts | Refund Dialogpost inward mail centre customer in 2022 | Refund Dialogpost inward mail centre customer in 2023 | Change |
|---------------------|---|---|----------|
| 187 | €0.016 | €0.017 | + €0.001 |

Figure 30: Contracts for Dialogpost inward mail centre customer access services (June 2023)

8.1.2 Contract for Dialogpost inward mail centre commercial consolidation access services

Mail consolidators must satisfy the same conditions for preparing mail items for access services for Dialogpost as in the above contract for the customer. The key difference between the contract for Dialogpost inward mail centre customer access services and the contract for Dialogpost inward mail centre commercial consolidation access services is that the mail consolidator was the sender.

The following figure provides an overview of the number of Dialogpost inward mail centre commercial consolidation access services contracts entered into by DP AG and shows the respective refund using a standard Dialogpost letter up to 20 g as an example. The change in the refund from 2021 to 2022 is also shown.

| Number of contracts | Refund Dialogpost inward mail centre commercial consolidation in 2021 | Refund Dialogpost inward mail centre commercial consolidation in 2022 | Change |
|---------------------|---|---|----------|
| 27 | €0.016 | €0.017 | + €0.001 |

Figure 31: Contracts for Dialogpost inward mail centre commercial consolidation access services (June 2023)

8.1.3 Contract for Dialogpost cooperation

In addition to the contracts for Dialogpost inward mail centre customer access services and for Dialogpost inward mail centre commercial consolidation access services, DP AG offers a cooperation agreement for sending Dialogpost including an additional agreement. The customer's cooperation services include the pre-sorting of mail, the production of containers and their classification. The customer must give notice of the conveyance orders in the order management system at least seven days before collection/drop-off. The customer must provide the following data: payer, payment method, drop-off/collection date, drop-off/collection location, mailing volume, basic product, weight of the item and number of pallets. Also, details of the type of franking, transport classification, mail planning and container information must be finalised

48 hours before drop-off. The mail items must be sorted by routing regions. The customer pays the rate stipulated in the "Dialogpost National" brochure for the mail items, less the intended discount of 5% for pallet production and pre-sorting by routing region.

The contracting party can generate a refund through the cooperation agreement for sending Dialogpost. To do so, DP AG's contracting party must drop off at least 100,000 mail items with a posting list. The contracting party also undertakes to cooperate with DP AG in the trialling of new electronic systems and new container classifications. The refund paid by DP AG to the contracting party is volume-based. The minimum volume per quarter is 1mn mail items and is reimbursed at a rate of 8% on the postage rate for Dialogpost. The maximum refund of 21.65% on the postage rate for Dialogpost can be achieved by a large volume mailer if it drops off a quarterly volume of 180mn.

The following figure provides an overview of the number of cooperation agreements for sending Dialogpost entered into by DP AG and shows the maximum refund for the standard product. The change in the refund from 2021 to 2022 is also shown.

| Number of contracts | Maximum refund in 2022 | Maximum refund in 2023 | Change |
|---------------------|------------------------|------------------------|----------|
| 658 | €0.065 | €0.074 | + €0.009 |

Figure 32: Cooperation agreements for Dialogpost inward mail centre access services (June 2023)

The additional agreement regulates the inclusion of drop-off volumes from companies controlled by the contracting party to calculate the refund generated for the quarterly volume.

8.2 Dialogpost access service rates

The postage rate for Dialogpost is dependent on the item weight. Under some circumstances, further discounts are possible in addition to the refunds granted under access service contracts. Besides a minimum volume of 5,000 items, the production of bundles, containers or pallets is required for this.

In standard format, the routing region containers must be at least half full or have a net weight of 2.5 kg. In large format, the routing region/postcode containers must be at least half full or have a net weight of 6 kg to receive discounts on the postage rate. However, this is not possible for unenclosed mail items.

A minimum net weight of 100 kg is necessary to generate discounts for pallet production with mail items in standard format. Large format mail items must have a minimum net weight of 200 kg or a pallet height of at least 1.60 m. For pallet mailing in card format, a minimum net weight of 50 kg is required and the basic standard format must be adhered to. Card pallet mailing in large format requires a minimum net weight of 100 kg. Generally, pallets must not exceed a maximum height of 1.80 m or five pallet frames (height around 1.20 m).

The following figure shows the discounts for Dialogpost.

Discounts for drop-off volumes upwards of 5,000

| <u>Bundle/container production, routing region</u> | <u>Bundle/container production, postcode</u> | <u>Pallet production, routing zone</u> | <u>Pallet production, routing region</u> |
|--|--|--|--|
| Standard 5% | | 2% | 5% |
| Large 4% | 5%* | | |

Source: DPAG, Dialogpost brochure

* Pre-sorting for discount on postcode container/bundle possible for mail items in large basic format only

Figure 33: Discounts for drop-off volumes upwards of 5,000 items

If the mail items are sorted by routing region, the partner receives a discount of 5% in standard format or 4% in large format. Sorted by postcode (large format only), a discount of 5% is granted. If a pallet is sorted by routing zone (first digit of postcode) only and not by routing region, the partner receives a 2% discount. Sorted by routing region, 5% is granted.

On entering into contracts for Dialogpost inward mail centre access services, the customer/mail consolidator receives a refund of 3% on the current net rate for Dialogpost mail items. The minimum volume is 250 mail items per routing region. In addition, the above discounts can also be generated by complying with conditions. A maximum refund of 21.65% is possible on entry into a contract for Dialogpost cooperation.

The postage rate (regular and discounted) for Dialogpost and the maximum possible access service rate when using contracts for inward mail centre Dialogpost access services and Dialogpost cooperation are shown in the following figure.

Postage/access service rates per Dialogpost mail item

| | <u>Dialogpost regular</u> | <u>Dialogpost regular discounted</u> | <u>Dialogpost access service rate contracts (inward mail centre customer and commercial consolidation)</u> | <u>Dialogpost access service rate contracts (inward mail centre customer and commercial consolidation)--discounted</u> | <u>Access service rate for Dialogpost cooperation agreement</u> |
|--|---------------------------|--------------------------------------|--|--|---|
| Card* | €0.31 | €0.29 | €0.30 | €0.26 | €0.21 |
| Standard | | | | | |
| 0-20 g | €0.34 | €0.32 | €0.33 | €0.28 | €0.23 |
| 21-50 g | €0.39 | €0.37 | €0.38 | €0.32 | €0.27 |
| Large | | | | | |
| 0-50 g | €0.48 | €0.46 | €0.47 | €0.41 | €0.33 |
| 51-100 g | €0.61 | €0.59 | €0.59 | €0.53 | €0.43 |
| 101-250 g | €0.75 | €0.72 | €0.73 | €0.66 | €0.53 |
| 251-500 g | €0.82 | €0.79 | €0.80 | €0.72 | €0.58 |
| 501-1000 g | €0.95 | €0.91 | €0.92 | €0.84 | €0.67 |
| Surcharges | | | | | |
| Production surcharge | €0.05 | | €0.05 | | |
| EASY (small volumes from 500 to 4,999) | €0.15 | | €0.15 | | |

Source: DP AG, Dialogpost brochure + Bundesnetzagentur

* Price based on card size and weight (maximum 500 g/m³)

Figure 34: Postage rate per Dialogpost item

The figure first shows the regular postage charges for Dialogpost, without discounts and without access service contracts. The column "Dialogpost regular discounted" shows the postage charges that can be achieved upwards of a minimum volume of 5,000 items per drop-off and the associated discount. The discounts are 5%

for Dialogpost in card or standard format and 4% in large format. This is equivalent, for example, to a discounted postage rate of €0.32 instead of the regular €0.34 for standard format or €0.46 instead of €0.48 for large format. A 3% refund (€0.33 rather than the regular €0.34) is possible on entry into a Dialogpost access service contract (inward mail centre customer or inward mail centre commercial consolidation). In combination with the discount, an "access service rate for Dialogpost contracts discounted" of €0.28 rather than the regular €0.34 can be achieved. If a Dialogpost cooperation agreement has been entered into, a further refund of up to 21.65% can be achieved in addition to the discount for pre-sorting by routing region and pallet production of 5%. The total maximum saving is 26.65%. This is equivalent to an access service rate of €0.23 instead of a regular €0.34 for standard format. The conditions for achieving the refund rates can be found in the above descriptions.

As an example, the following figure shows the development in the postage rate since 2016, including the discounts/refunds possible, for Dialogpost in standard format.

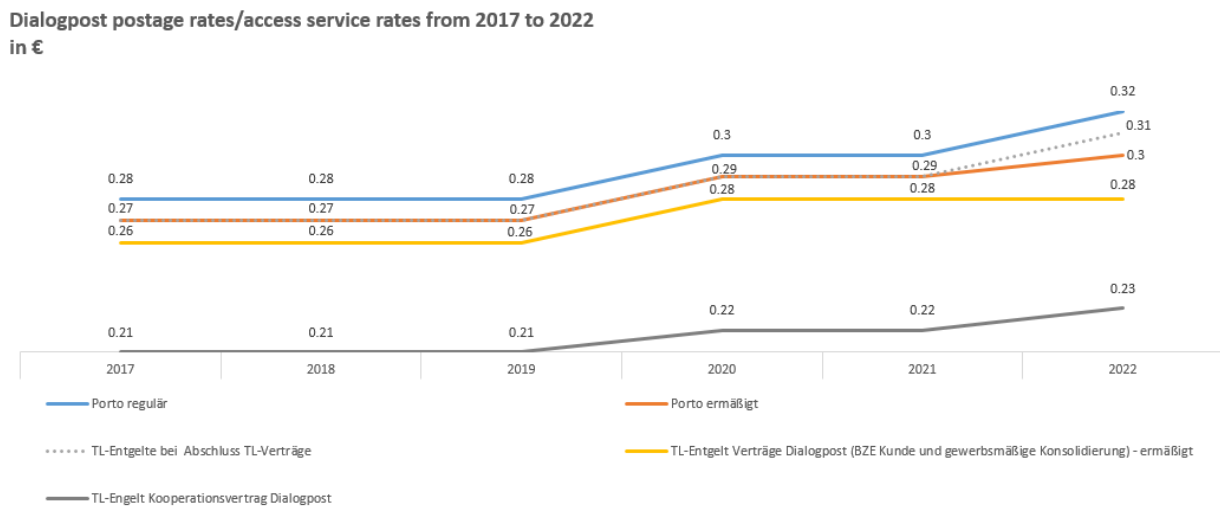


Figure 35: Postage rate for Dialogpost and with an access service agreement for Dialogpost

The figure shows a rising trend in the postage rate. There were increases of €0.02 (to €0.30 and €0.32 respectively) for standard format in 2020 and 2022. As the respective refund percentage on entry into a contract for Dialogpost inward mail centre access services or a Dialogpost cooperation agreement has not changed, the curves are proportionally the same.

Annex

Annex 1: Overview of access service refunds 2010 – 2022 (outward mail centre)

Standard letter

Outward mail centre customer letter/outward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 5,000 to 10,000 mail items | 20% | 0.110 | 20% | 0.110 | 20% | 0.110 | 22% | 0.128 | 22% | 0.132 | 22% | 0.134 | 27% | 0.189 | 24% | 0.162 | 23% | 0.161 | 30% | 0.240 | 28% | 0.224 | 28% | 0.224 | 31% | 0.264 |
| from 10,001 to 15,000 mail items | 23% | 0.127 | 23% | 0.127 | 23% | 0.127 | 25% | 0.145 | 25% | 0.150 | 25% | 0.155 | 30% | 0.210 | 28% | 0.203 | 26% | 0.192 | 32% | 0.256 | 30% | 0.240 | 30% | 0.240 | 33% | 0.291 |
| from 15,001 to 20,000 mail items | 27% | 0.149 | 27% | 0.149 | 27% | 0.149 | 29% | 0.165 | 29% | 0.174 | 29% | 0.180 | 34% | 0.233 | 33% | 0.221 | 30% | 0.210 | 36% | 0.288 | 34% | 0.272 | 34% | 0.272 | 37% | 0.315 |
| from 20,001 to 25,000 mail items | 31% | 0.171 | 31% | 0.171 | 31% | 0.171 | 33% | 0.191 | 33% | 0.198 | 33% | 0.205 | 38% | 0.264 | 37% | 0.259 | 34% | 0.238 | 39% | 0.312 | 37% | 0.294 | 37% | 0.294 | 40% | 0.340 |
| upward of 25,001 mail items | 35% | 0.193 | 35% | 0.193 | 35% | 0.193 | 37% | 0.215 | 37% | 0.222 | 37% | 0.229 | 42% | 0.294 | 41% | 0.287 | 38% | 0.264 | 43% | 0.344 | 41% | 0.328 | 41% | 0.328 | 44% | 0.374 |

Compact letter

Outward mail centre customer letter/outward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 5,000 to 10,000 mail items | 20% | 0.100 | 20% | 0.100 | 20% | 0.100 | 20% | 0.100 | 20% | 0.100 | 20% | 0.100 | 20% | 0.100 | 19% | 0.107 | 16% | 0.106 | 20% | 0.209 | 20% | 0.190 | 20% | 0.190 | 23% | 0.230 |
| from 10,001 to 15,000 mail items | 23% | 0.207 | 23% | 0.207 | 23% | 0.207 | 23% | 0.207 | 23% | 0.207 | 23% | 0.196 | 23% | 0.196 | 22% | 0.187 | 19% | 0.162 | 25% | 0.238 | 23% | 0.219 | 23% | 0.219 | 24% | 0.240 |
| from 15,001 to 20,000 mail items | 27% | 0.243 | 27% | 0.243 | 27% | 0.243 | 27% | 0.243 | 27% | 0.243 | 27% | 0.230 | 27% | 0.230 | 26% | 0.221 | 23% | 0.196 | 28% | 0.264 | 24% | 0.247 | 24% | 0.247 | 24% | 0.240 |
| from 20,001 to 25,000 mail items | 31% | 0.279 | 31% | 0.279 | 31% | 0.279 | 31% | 0.279 | 31% | 0.279 | 31% | 0.264 | 31% | 0.264 | 30% | 0.255 | 27% | 0.230 | 32% | 0.304 | 30% | 0.285 | 30% | 0.285 | 33% | 0.320 |
| upward of 25,001 mail items | 35% | 0.315 | 35% | 0.315 | 35% | 0.315 | 35% | 0.315 | 35% | 0.315 | 35% | 0.298 | 35% | 0.298 | 34% | 0.289 | 31% | 0.264 | 35% | 0.333 | 33% | 0.314 | 33% | 0.314 | 36% | 0.340 |

Large letter

Outward mail centre customer letter/outward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 500 to 1,000 mail items | 20% | 0.290 | 20% | 0.290 | 20% | 0.290 | 20% | 0.290 | 20% | 0.290 | 20% | 0.290 | 20% | 0.290 | 19% | 0.276 | 16% | 0.232 | 19% | 0.295 | 17% | 0.264 | 17% | 0.264 | 19% | 0.304 |
| from 1,001 to 2,000 mail items | 23% | 0.334 | 23% | 0.334 | 23% | 0.334 | 23% | 0.334 | 23% | 0.334 | 23% | 0.334 | 23% | 0.334 | 22% | 0.319 | 19% | 0.276 | 22% | 0.341 | 20% | 0.310 | 20% | 0.310 | 22% | 0.352 |
| from 2,001 to 3,000 mail items | 27% | 0.392 | 27% | 0.392 | 27% | 0.392 | 27% | 0.392 | 27% | 0.392 | 27% | 0.392 | 27% | 0.392 | 26% | 0.377 | 23% | 0.334 | 25% | 0.388 | 23% | 0.357 | 23% | 0.357 | 25% | 0.400 |
| from 3,001 to 4,000 mail items | 31% | 0.450 | 31% | 0.450 | 31% | 0.450 | 31% | 0.450 | 31% | 0.450 | 31% | 0.450 | 31% | 0.450 | 30% | 0.435 | 27% | 0.392 | 29% | 0.450 | 27% | 0.419 | 27% | 0.419 | 29% | 0.464 |
| upward of 4,001 mail items | 35% | 0.508 | 35% | 0.508 | 35% | 0.508 | 35% | 0.508 | 35% | 0.508 | 35% | 0.508 | 35% | 0.508 | 34% | 0.493 | 31% | 0.450 | 33% | 0.512 | 31% | 0.481 | 31% | 0.481 | 33% | 0.528 |

Maxi Letter

Outward mail centre customer letter/outward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| From 500 to 1,000 mail items | 20% | 0.440 | 20% | 0.440 | 20% | 0.440 | 20% | 0.480 | 20% | 0.480 | 20% | 0.480 | 20% | 0.520 | 19% | 0.494 | 16% | 0.416 | 17% | 0.459 | 15% | 0.406 | 15% | 0.406 | 16% | 0.440 |
| from 1,001 to 2,000 mail items | 23% | 0.506 | 23% | 0.506 | 23% | 0.506 | 23% | 0.552 | 23% | 0.552 | 23% | 0.552 | 23% | 0.590 | 22% | 0.572 | 19% | 0.494 | 19% | 0.513 | 17% | 0.459 | 17% | 0.459 | 18% | 0.495 |
| from 2,001 to 3,000 mail items | 27% | 0.594 | 27% | 0.594 | 27% | 0.594 | 27% | 0.648 | 27% | 0.648 | 27% | 0.648 | 27% | 0.702 | 26% | 0.676 | 23% | 0.598 | 23% | 0.621 | 21% | 0.567 | 21% | 0.567 | 22% | 0.605 |
| from 3,001 to 4,000 mail items | 31% | 0.682 | 31% | 0.682 | 31% | 0.682 | 31% | 0.744 | 31% | 0.744 | 31% | 0.744 | 31% | 0.806 | 30% | 0.780 | 27% | 0.702 | 27% | 0.729 | 25% | 0.675 | 25% | 0.675 | 26% | 0.715 |
| upward of 4,001 mail items | 35% | 0.770 | 35% | 0.770 | 35% | 0.770 | 35% | 0.840 | 35% | 0.840 | 35% | 0.840 | 35% | 0.910 | 34% | 0.884 | 31% | 0.806 | 31% | 0.837 | 29% | 0.763 | 29% | 0.763 | 30% | 0.825 |

Postcard

Outward mail centre customer letter/outward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 5,000 to 10,000 mail items | 20% | 0.090 | 20% | 0.090 | 20% | 0.090 | 20% | 0.090 | 20% | 0.090 | 20% | 0.090 | 20% | 0.090 | 19% | 0.086 | 16% | 0.072 | 20% | 0.180 | 20% | 0.160 | 20% | 0.160 | 20% | 0.160 |
| 10,001 to 15,000 mail items | 23% | 0.104 | 23% | 0.104 | 23% | 0.104 | 23% | 0.104 | 23% | 0.104 | 23% | 0.104 | 23% | 0.104 | 22% | 0.099 | 19% | 0.085 | 22% | 0.192 | 20% | 0.180 | 20% | 0.180 | 21% | 0.209 |
| from 15,001 to 20,000 mail items | 27% | 0.122 | 27% | 0.122 | 27% | 0.122 | 27% | 0.122 | 27% | 0.122 | 27% | 0.122 | 27% | 0.122 | 26% | 0.117 | 23% | 0.104 | 24% | 0.216 | 24% | 0.204 | 24% | 0.204 | 24% | 0.237 |
| from 20,001 to 25,000 mail items | 31% | 0.140 | 31% | 0.140 | 31% | 0.140 | 31% | 0.140 | 31% | 0.140 | 31% | 0.140 | 31% | 0.140 | 30% | 0.135 | 27% | 0.122 | 29% | 0.234 | 27% | 0.222 | 27% | 0.222 | 28% | 0.258 |
| upward of 25,001 mail items | 35% | 0.158 | 35% | 0.158 | 35% | 0.158 | 35% | 0.158 | 35% | 0.158 | 35% | 0.158 | 35% | 0.158 | 34% | 0.153 | 31% | 0.140 | 33% | 0.258 | 31% | 0.244 | 31% | 0.244 | 32% | 0.280 |

Annex 2: Overview of access service refunds 2010 – 2022 (inward mail centre)

Standard letter

Inward mail centre customer letter/inward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 250 | 38% | 0.209 | 38% | 0.209 | 38% | 0.209 | 40% | 0.232 | 40% | 0.240 | 40% | 0.248 | 45% | 0.315 | 44% | 0.308 | 41% | 0.287 | 46% | 0.368 | 44% | 0.352 | 44% | 0.352 | 47% | 0.400 |

Compact letter

Inward mail centre customer letter/inward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 250 | 38% | 0.342 | 38% | 0.342 | 38% | 0.376 | 38% | 0.342 | 38% | 0.342 | 38% | 0.323 | 38% | 0.323 | 37% | 0.315 | 34% | 0.289 | 38% | 0.361 | 36% | 0.342 | 38% | 0.342 | 39% | 0.390 |

Large letter

Inward mail centre customer letter/inward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 100 | 38% | 0.551 | 38% | 0.551 | 38% | 0.551 | 38% | 0.551 | 38% | 0.551 | 38% | 0.551 | 38% | 0.551 | 37% | 0.537 | 34% | 0.493 | 36% | 0.558 | 34% | 0.527 | 34% | 0.527 | 36% | 0.576 |

Maxi Letter

Inward mail centre customer letter/inward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 100 | 38% | 0.836 | 38% | 0.836 | 38% | 0.836 | 38% | 0.836 | 38% | 0.912 | 38% | 0.912 | 38% | 0.968 | 37% | 0.962 | 34% | 0.884 | 34% | 0.918 | 32% | 0.864 | 32% | 0.864 | 33% | 0.908 |

Postcard

Inward mail centre customer letter/inward mail centre consolidation letter

| Minimum number of mail items per drop-off | 2010 refund | | 2011 refund | | 2012 refund | | 2013 refund | | 2014 refund | | 2015 refund | | 2016 refund | | 2017 refund | | 2018 refund | | 2019 refund | | 2020 refund | | 2021 refund | | 2022 refund | |
|---|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|-------------|-------|
| | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € | in % | in € |
| 250 | 38% | 0.171 | 38% | 0.171 | 38% | 0.171 | 38% | 0.171 | 38% | 0.171 | 38% | 0.171 | 38% | 0.171 | 37% | 0.167 | 34% | 0.153 | 46% | 0.276 | 44% | 0.264 | 44% | 0.264 | 51% | 0.357 |

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List of abbreviations

DP AG

Deutsche Post AG

DP IHS

Deutsche Post InHaus Services GmbH

PostG

German Postal Act

Publisher's details

Publisher

Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen

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