Bundesnetzagentur

**Report** Comparison of letter prices in Europe 2022



# Comparison of letter prices in Europe 2022

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#### 2 | BUNDESNETZAGENTUR

#### Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen

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### 1 Introduction

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

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

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

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

## 2 Methodology

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

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

The letter prices in countries not belonging to the euro area were converted into euros using the foreign exchange reference rates published by the European Central Bank (ECB) for 3 January 2022.<sup>2</sup>

The comparisons are based on real prices. The real price was calculated by taking the nominal letter price minus the inflation rate from the year 2021. The nominal price of a product or service describes the actual price in monetary terms, whereas the real price reflects adjustment for inflation. The Harmonised Indices of Consumer Prices (HICPs) published by Eurostat were used for the inflation rates for the individual countries.<sup>3</sup> In countries where tax is payable on letter prices (such as Denmark), the tax was also taken into account and the nominal price was not reduced by the amount of the tax, in order to make the retail prices comparable.

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

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

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

## 3 Selection of the comparison countries

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

#### 3.1 Comparable markets

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

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

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

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

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

#### 3.2 Special features in the markets

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

It can be assumed that the main reasons for a change in volumes lie in the pricing for letter products and in the increasing digitalisation of communications between public institutions/companies and the general public/customers. The chart below shows the change in the volumes of letters handled by universal service providers in selected European countries from 2014 to 2020, with 2014 as the base year.

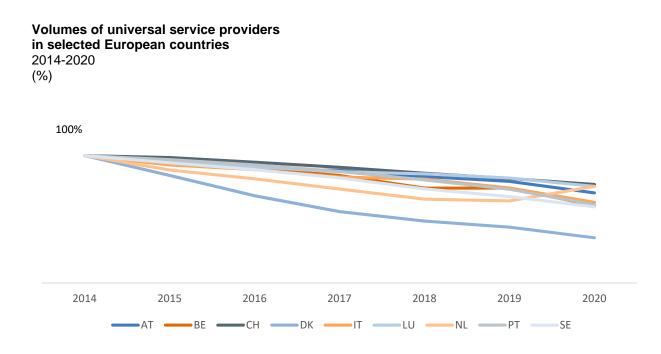


Figure 1: volumes of universal service providers in selected European countries

The chart includes those countries for which data for the universal service providers' volumes were available for the whole period from 2014 to 2020. It should be noted that the data provided on volumes differ between the universal service providers. For example, in some cases only total volumes are provided, while in other cases a distinction is made between addressed and non-addressed items. Another distinction made by service providers to differentiate between products is between priority and non-priority items. The trends in volumes shown for the universal service providers are based on the volumes of addressed items (Austria (AT), Switzerland (CH), Italy (IT), the Netherlands (NL), Portugal (PT)). If no data on the volume of addressed items are available, the next best data (for example on the total volume) are used (Belgium (BE), Denmark (DK), Luxembourg (LU), Sweden (SE)).

Figure 1 shows a decline in letter volumes in all the countries. Volumes in Denmark and Belgium in 2020 were 65% and 39% respectively of the volumes in 2014. The figures presented support the theory put forward above that digitalisation is a contributing factor to the decline in the volume of traditional letters. In effect, the increasing spread of digital technology is permanently taking away volumes from the letters market. In Germany, the volume of addressed items handled by Deutsche Post AG decreased from 8,882 billion in 2014

to 6,827bn in 2020.<sup>6</sup> This represents a decline of 23% for the letters segment. Compared with volumes in other countries, the decline in Deutsche Post AG's volumes is slow but steady.

The table in Annex 1 presents all the information on the letter volumes of the universal service providers in all the countries considered in this report for which complete information on volumes is available. The table shows the data on volumes published by the universal service providers for the period from 2014 to 2020. The table also shows the percentage change in volumes in this period and the items for which data on volumes were published (addressed/total/priority and non-priority).

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

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

#### 3.3 Countries selected for comparison

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

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

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

## 4 Selection of the products for comparison

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

Other countries have different criteria in terms of size, weight and delivery speed. For example, 19 countries do not have two separate products corresponding to Germany's standard (20 g) and compact (50 g) letters. In some countries, the maximum weight for products comparable with a standard letter is 100 g, as in CH, IE and UK, or even much higher, as in EE (250 g) and PL (500 g).

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

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

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

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

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

### 5 Conducting the comparisons

#### 5.1 Standard letter

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

The chart below shows the prices for a letter with D+1 delivery in the comparison countries as at 4 January 2022.

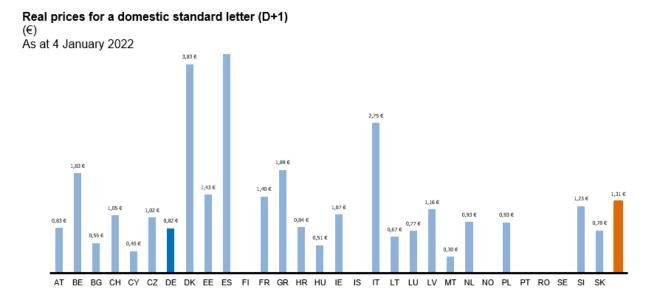


Figure 2: real prices for a domestic standard letter (D+1)

The prices for the products comparable with a standard letter with D+1 delivery in DK, ES and IT are outliers compared with the other countries. The prices –  $\in$ 3.83,  $\notin$ 4.37 and  $\notin$ 2.75 – are much higher than the comparable prices in other countries. The average real price for a domestic standard letter for the comparison group, including these countries, is  $\notin$ 1.31. However, it should be noted that the products in the three abovementioned countries do not only stand out because of their price. The product features alone mean they are not readily comparable with Deutsche Post AG's standard letter because of additional conditions and restrictions for posting/destinations.

<sup>&</sup>lt;sup>8</sup> FI, IS, NO, PT, RO and SE do not have a standard letter product with guaranteed D+1 delivery.

Country	Product	Guaranteed delivery	Features	Conditions
DK	Quick Letter	D+1	25% VAT; up to 50 g	Items must be posted at a postal outlet
IT	Posta1	D+1	Information about delivery; up to 100 g	D+1 delivery for 80% of items; additional processing day for online items; delivery speed depends on where items are posted/to be delivered
ES	Carta y Tarifa Postal Urgente Nacional	D+1	Information about delivery; up to 500 g	For items posted before 4pm from and to cities

Features and conditions for guaranteed D+1 delivery

Source: postal companies' websites

Figure 3: features and conditions for guaranteed D+1 delivery

The above-mentioned product features are therefore more comparable with Deutsche Post AG's *Prio* letter (stamp price plus extra charge for priority =  $\leq$ 1.95). However, the *Prio* letter product does not have a guaranteed delivery speed. In addition to the general rate of 93% for D+1 delivery, it provides tracking as well as priority handling. The average price for a standard letter with D+1 delivery, excluding the products in DK, IT and ES because of the above-mentioned features, is  $\leq$ 0.95.

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

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

(€) As at 4 January 2022

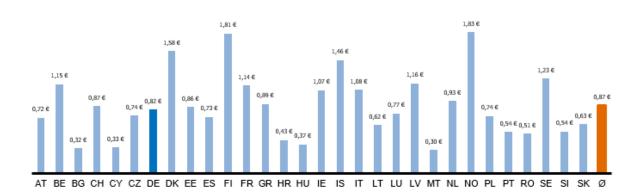


Figure 4: real prices for a domestic standard letter (D+X)

In contrast to the above-mentioned comparison for D+1 delivery, this comparison was based on the less expensive product (D+X) for personal customers in each country from the obvious viewpoint of affordability. This results in a lower average across all the comparison countries of  $\notin 0.87$ .

The different products offered in the different countries could be a response to the coverage structure (such as population density, coverage area, volume and costs) and behaviour among personal customers (digital/physical mail). Countries with a high degree of digitalisation (such as DK and NL) or with predominantly rural structures have been adapting to the (changed) framework conditions in the postal sector for longer. In Denmark, for example, communication with authorities was transformed in 2014 with the introduction of the Public Digital Post Act.<sup>9</sup> Although next-day delivery (D+1) is not guaranteed in any of the comparison countries, it is likely. A less expensive product with a slightly slower delivery speed (D+2, D+3) is often offered in addition to D+1 delivery. Nevertheless, a D+X service may also provide delivery on the next working day.

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

#### **Overview of averages**

	D+1 comparison without FI,IS,NO,PT,RO,SE	D+1 comparison without FI,IS,NO,PT,RO,SE and with correction for DK, IT, ES	D+X comparison
Average for whole comparison group	€1.31	€0.97	€0.87
Average for listed companies	€1.24	€0.94	€0.79
Average for non- listed companies	€1.33	€1.04	€0.90

Source: Bundesnetzagentur

Figure 5: average prices as at 4 January 2022

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

<sup>&</sup>lt;sup>9</sup> See the 2020 international letter price comparison: Bundesnetzagentur - Internationaler Briefpreisvergleich (in German).

#### 5.2 Compact letter

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

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

(€) As at 4 January 2022

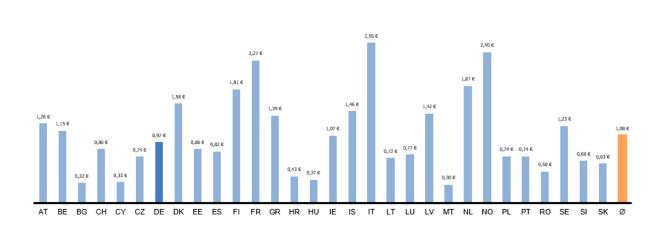


Figure 6: real prices for a domestic compact letter (D+X)

The prices in FR, IT and NO are more than double the average of  $\leq$ 1.08, but in most of the countries the prices are below the average. The majority of countries (23) have a product comparable to Deutsche Post AG's compact letter with a maximum weight of 50 grams. The universal service providers in AT, CH, EE, FR, IE, LV and PL allow a higher maximum weight. Deutsche Post AG's price of  $\leq$ 0.97 is below the European average of  $\leq$ 1.08.

#### 5.3 Large letter

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

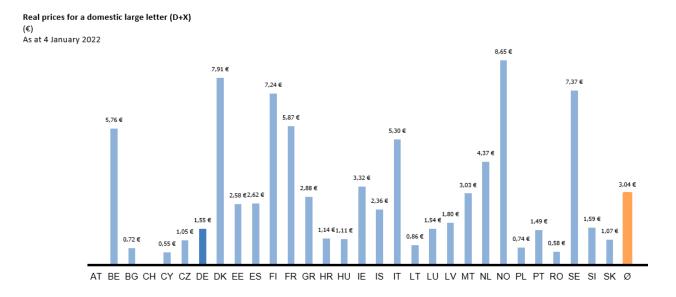


Figure 7: real prices for a domestic large letter (D+X)

It should be noted here that the comparable products in the countries with a very high price (BE, DK, NO) have a higher maximum weight (up to 2 kg) than Deutsche Post AG's product (500 g). The overall average is  $\in$  3.04, thus the price for Deutsche Post AG's product of  $\notin$ 1.55 is 49% cheaper.

#### 5.4 Maxi letter

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

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

€ As at 4 January 2022

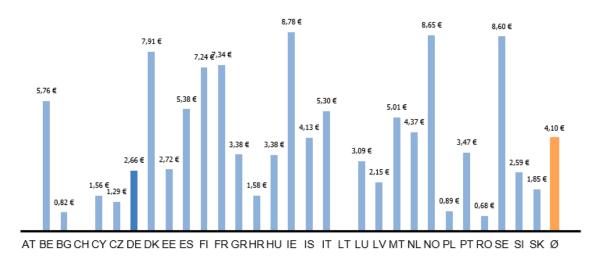


Figure 8: real prices for a domestic maxi letter (D+X)

A closer look at the prices for a maxi letter shows a wider variation from the real price for Deutsche Post AG's maxi letter ( $\leq 2.66$ ) than in the comparisons for standard and compact letters. The average price for this product is  $\leq 4.10$ .

#### Additional comparisons 6

#### 6.1 **Price trends**

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

The table below shows, by way of example, the change in the real prices for a standard letter from one year to the next and from the beginning to the end of the period from 2018 to 2022. The changes in the prices for the other product groups are shown in the annexes.

Development of	of inflation-adjusted				
Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2018 to 2022
AT	5%	0%	6%	-1%	9%
BE	22%	1%	17%	5%	51%
BG	0%	0%	3%	-3%	0%
СН	-12%	5%	0%	10%	2%
CY	0%	0%	0%	-3%	-3%
CZ	4%	-1%	-4%	6%	4%
DE	1%	14%	1%	2%	21%
DK	15%	0%	11%	7%	36%
EE	0%	2%	42%	-5%	37%
ES	9%	8%	9%	4%	35%
FI	1%	7%	10%	4%	23%
FR	15%	12%	8%	10%	52%
GR	0%	2%	40%	-2%	39%
HR	0%	0%	7%	-2%	5%
HU	-5%	8%	-8%	3%	-3%
IE	1%	0%	1%	7%	9%
IS	9%	-3%	9%	3%	19%
п	15%	0%	1%	-2%	14%
LT	30%	0%	0%	29%	68%
LU	3%	13%	1%	-4%	13%
LV	2%	98%	3%	16%	142%
MT	4%	15%	0%	0%	20%
NL	2%	9%	7%	-2%	16%
NO	13%	6%	3%	8%	33%
PL	22%	25%	-7%	6%	51%
PT	2%	2%	0%	2%	6%
RO	11%	23%	0%	34%	82%
SE	0%	16%	16%	4%	40%
SI	8%	12%	17%	-2%	38%
SK	0%	29%	3%	-3%	29%

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Figure 9: development of inflation-adjusted prices in Europe for a standard letter

The table shows an increase in prices in the last five years in all countries except CY and HU. However, these two exceptions may be due to fluctuations in exchange rates/inflation rates. The largest price increase was in Latvia, where the price rose by 142% from €0.48 to €1.16. The next largest increase of 82% was in Romania, where the real price rose from €0.28 in 2018 to €0.51 in 2022. The change in Germany was 21% (2018: €0.68; 2022: €0.82).

#### 6.2 Higher prices in other countries

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

The table below shows the 2022 prices of the foreign universal service providers' products that had a higher price than in Germany. The table does not include the products that had a lower price than the German universal service provider's corresponding product. The table lists the prices for the products comparable with a standard, compact, large and maxi letter. The table also lists the price in Germany and the average in Europe for comparison.

expensive than	Standard letter -	Compact letter -	Large letter -	Maxi letter -
Germany	real price	real price	real price	real price
AT		€1.26		
BE	€1.15	€1.15	€5.76	€5.76
СН	€0.87			
DK	€1.58	€1.58	€7.91	€7.91
EE	€0.86		€2.58	€2.72
ES			€2.62	€5.38
FI	€1.81	€1.81	€7.24	€7.24
FR	€1.14	€2.27	€5.87	€7.34
GR	€0.89	€1.39	€2.88	€3.38
HU				€3.38
IE	€1.07	€1.07	€3.32	€8.78
IS	€1.46	€1.46	€2.36	€4.13
IT	€1.08	€2.55	€5.30	€5.30
LU				€3.09
LV	€1.16	€1.42	€1.80	
MT	-	-	€3.03	€5.01
NL	€0.93	€1.87	€4.37	€4.37
NO	€1.83	€2.40	€8.65	€8.65
РТ				€3.47
SE	€1.23	€1.23	€7.37	€8.60
SI			€1.59	
DE	€0.82	€0.97	€1.55	€2.66
ø Europe overall	€0.87	€1.08	€3.04	€4.10

#### **Countries more**

Figure 10: 2002 prices higher than the German price

The prices in BE, DK, FI, FR, GR, IE, IS, IT, NL, NO and SE are higher than the prices in Germany in each product category. The prices in EE and LV are higher than Deutsche Post AG's prices in three categories

(standard, large and maxi letter/standard, compact and large letter). Other countries (such as ES, LU, MT) have higher prices than Germany in one or two categories.

The countries with higher prices in at least three categories were looked at more closely. An analysis was made of structural data (total number of inhabitants, surface area, population density, inhabitants per postal outlet, letters per inhabitant, parcels per inhabitant, number of towns with more than 500,000 inhabitants) and of letter volumes and postal company data (postal outlets, total letter volumes, total number of employees). The comparison was based on data from 2020 because the annual reports and the data derived from them for 2021 had not yet all been published by the relevant foreign universal service providers.

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

	Total number of inhabitants	Surface area (km²)	Population density	Inhabitants per postal outlet	Letters per inhabitant	Parcels per inhabitant	Metropolitan region area (km²)	Number of postal outlets	Total letter volume	Total number of employees
BE	11.522.440	30.666	376	17.538	127	10	30.451	657	1.468.120	32.030
DK	5.822.763	42.925	136	kA	kA	kA	41.987	kA	193.200.000	kA
EE	1.324.820	45.336	29	4416	2	19	502.654	300	2.000.000	2.294
FI	5.517.919	338.450	16	kA	84	9	304.316	kA	462.000.000	20.468
FR	67.177.636	638.475	105	8.724	283	3	633.886	7.700	19.020.000.000	249.304
GR	10.718.565	131.694	81	kA	kA	kA	130.048	kA		
IE	4.904.240	69.947	71	4.558	56	11	68.665	kA	278.522.000	9.723
IS	356.991	102.679	3	6155	126	kA	100.450	58	45.000.000	721
IT	59.816.673	302.073	198	4.670	46	2	297.734	12.809	2.735.000.000	53.002
LV	1.919.968	64.586	30	kA	kA	kA	63.290	kA	kA	kA
NL	17.282.163	37.378	462	11.143	101	16	34.188	1.551	1.742.000.000	46.303
NO	5.328.212	323.381	7	4.089	102	11	309.158	1.303	542.793.000	14.270
SE	10.230.185	447.424	23	kA	132	17	407.300	kA	1.346.000.000	28.672
DE	83.019.213	357.569	232	6.386	166	16	353.296	13.000	13.750.000.000	159.100

Figure 111: structural and company data for the countries with a higher standard letter price than Germany

No uniform conclusions can be drawn from the data on the reasons for the higher prices. There are large differences in, for example, the number of letters per inhabitant (EE: 2; FR: 283) and, similarly, in the number of employees (IS: 721; FR: 249,304). The differences can probably be explained by the inhabitant and surface area data, but a more detailed analysis would be necessary to be able to draw any valid conclusions. The company data for the letters segment (costs, revenue) that would be needed for a more detailed analysis are, however, not available. Nevertheless, in order to enable an analysis to be made in the future, the company data available have been compiled and presented here. A better picture of the links between price trends and structural data may emerge with time.

## 7 Summary

The comparisons produced various findings that are summarised below:

- Volumes are declining overall. The reasons for the decline in volumes may include digitalisation strategies of governments and authorities with the relevant legal basis and the cost benefits for senders associated with the digitalisation of communications.
- Many countries have a product for delivery on the next working day (D+1) as well as a less expensive product with a possibly slower delivery speed (D+X). There are additional conditions for senders for delivery on the next working day (D+1) in, for example, DK, ES and IT.
- The usual speed of delivery for the less expensive products with D+X delivery varies between one and five working days. The longest time is given.
- The range of products offered represents a response to changes in customer behaviour (digital/physical mail) and the coverage structure (volumes, costs).
- Many countries do not have a common distinction between standard and compact letters. The maximum weights in some of the comparison countries are much higher than for a standard letter in Germany.
- Prices for a standard letter rose between 2018 and 2022 in nearly all the comparison countries (not in CY and HU).
- Eleven countries have prices that are higher than the price in Germany for each of the products compared. No uniform conclusions can be drawn from the data available on the reasons for the higher prices.
- Deutsche Post AG's prices are frequently below the European average. The prices for large and maxi letters are well below the European average.

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

Standard letter	Comparison D+1	Comparison D+1	Comparison D+X	Deutsche Post AG real price
Average for whole comparison group	€1.31*	€0.97*	€0.87	€0.82
Average for listed companies	€1.24*	€0.94*	€0.79	€0.82
Average for non-listed companies	€1.33*	€1.04*	€0.90	€0.82
Compact letter	€1.08			€0.97
Large letter	€3.04			€1.55
Maxi letter	€4.10			€2.66

#### Overview of averages

\* without FI, IS, NO, PT, RO, SE

**\*\*** without DK, IT and ES in addition because of special product features

Figure 122: overview of averages

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Country	Company	Type of data collected	2014	2015	2016	2017	2018	2019	2020	Change (%)
AT	österreich- ische Post	Addressed	1.934.000.000	1.820.000.000	1.733.000.000	1.710.000.000	1.615.000.000	1.543.000.000	1.368.000.000	-29
BE	bpost	Total	2.419.200.000	2.302.300.000	2.178.540.000	2.041.871.195	1.927.800.000	1.803.400.000	1.468.120.000	-39
СН	Die Post	Addressed	2.203.100.000	2.171.600.000	2.088.800.000	2.001.900.000	1.898.000.000	1.807.000.000	1.706.000.000	-23
DE	Deutsche Post	Addressed	8.882.000.000	8.552.000.000	8.242.000.000	7.964.000.000	7.709.000.000	7.450.000.000	6.827.000.000	-23
DK	PostNord Denmark	Priority + non-priority	545.000.000	460.000.000	373.000.000	305.000.000	265.000.000	238.500.000	193.200.000	-65
ES	Correos	Total	3.099.000.000	2.563.000.000	2.774.000.000	2.637.000.000	2.700.000.000	2.410.000.000	1.849.000.000	-40
FI	Posti	Addressed	900.000.000	815.000.000	760.000.000	710.000.000	670.000.000	636.500.000	535.000.000	-41
FR	la poste	Addressed	12.889.000.000	12.045.000.000	11.529.000.000	10.745.000.000	10.600.000.000	9.098.000.000	7.473.000.000	-42
HR	Hrvatska posta	Total	1.768.416.000	1.700.400.000	1.635.000.000	1.605.000.000	1.468.000.000	1.183.300.000	899.400.000	-49
IE	An Post	Total	435.815.000	349.492.000	331.759.000	295.717.000	269.907.000	278.522.000	258.747.000	-41
ІТ	poste italiane	Addressed	1.901.000.000	1.763.000.000	1.692.000.000	1.580.000.000	1.550.000.000	1.418.000.000	1.204.000.000	-37
LU	Post Luxembourg	Total	152.914.055	146.735.816	139.386.790	133.540.324	130.933.014	126.000.000	116.000.000	-24
NL	postNL	Addressed	2.705.000.000	2.401.000.000	2.213.000.000	1.994.000.000	1.781.000.000	1.742.000.000	2.054.000.000	-24
NO	Posten Norge	Addressed	916.805.000	857.743.000	763.103.000	685.454.000	602.764.000	542.793.000	438.148.000	-52
PT	ctt	Addressed	841.300.000.000	814.700.000.000	780.200.000.000	736.600.000	680.700.000	619.000.000	516.900.000	-100
SE	PostNord Sweden	Priority + non-priority	1.983.000.000	1.872.000.000	1.765.000.000	1.637.000.000	1.464.000.000	1.346.000.000	1.186.000.000	-40
UK	Royal Mail	Addressed	13.009.000.000	12.563.000.000	11.922.000.000	11.922.000.000	10.709.000.000	10.047.000.000	7.727.000.000	-41

## Annex 1: overview of letter volumes 2014-2020

Source: postal companies' annual reports

DE: DPDHL's annual report for 2020 no longer includes international volumes (approx 1bn items) in the figures for the German postal segment.

## Annex 2: overview of nominal and real prices for a standard letter (D+1)<sup>10</sup>

Country	Nominal price domestic standard letter	Real price domestic standard letter	Weight	Delivery speed	Product name
AT	€0.85	€0.83	20 g	D+1	PRIO Letter
BE	€1.89	€1.83	50 g	D+1	Lettre Prior
BG	€0.56	€0.55	50 g	D+1	Format P Priority
CH	€1.06	€1.05	100 g	D+1	A-Post Standardbrief
CY	€0.41	€0.40	50 g	D+?	A Priority
CZ	€1.05	€1.02	50 g	D+1	Ordinary Letter
DE	€0.85	€0.82	20 g	D+1	Standardbrief
DK	€3.90	€3.83	50 g	D+1	Quick Letter
EE	€1.50	€1.43	250 g	D+1	Letter
ES	€4.50	€4.37	20 g	D+1	Urgent letter
FI					
FR	€1.43	€1.40	20 g	D+1	Lettre Prioritaire
GR	€1.90	€1.89	20 g	D+1	1st Class Priority A
HR	€0.86	€0.84	50 g	D+1	Priority Letter
HU	€0.54	€0.51	50 g	D+1	Standard Letter Priority
IE	€1.10	€1.07	100 g	D+1	StandardPost
IS					
IT	€2.80	€2.75	100 g	D+1	Posta1
LT	€0.70	€0.67	20 g	D+1	Small letter Post Item Priority
LU	€0.80	€0.77	50 g	D+1	Standardbrief
LV	€1.20	€1.16	250 g	D+1	Ordinary Letter
MT	€0.30	€0.30	50 g	D+1	Local letter
NL	€0.96	€0.93	20 g	D+1	Brief
NO					
PL	€0.98	€0.93	500 g	D+1	List zwykly Priorytet
PT					
RO					
SE					
SI	€1.26	€1.23	20 g	D+1	Standard Letter
SK	€0.80	€0.78	50 g	D+1	1st Class Letter
ø	€1.34	€1.31			

<sup>&</sup>lt;sup>10</sup> Source: Postal companies' websites/Eurostat

# Annex 3: overview of nominal and real prices for a standard letter $(D+X)^{11}$

Country	Nominal price domestic standard letter	Real price domestic standard letter	Weight	Delivery speed	Product name
AT	€0.74	€0.72	20 g	D+2	ECO
BE	€1.19	€1.15	50 g	D+3	Lettre Non Prior
BG	€0.33	€0.32	50 g	D+2	Format P Non-priority
СН	€0.87	€0.87	100 g	D+3	B-Post Standardbrief
CY	€0.34	€0.33	50 g	D+?	B Priority
CZ	€0.77	€0.74	50 g	D+1	Ordinary Letter
DE	€0.85	€0.82	20 g	D+1	Standardbrief
DK	€1.61	€1.58	50 g	D+5	Letter
EE	€0.90	€0.86	250 g	D+1	Letter
ES	€0.75	€0.73	20 g	D+3	Standard Letter
FI	€1.85	€1.81	50 g	D+4	Regular Letter
FR	€1.16	€1.14	20 g	D+2	Lettre Verte
GR	€0.90	€0.89	20 g	D+3	2nd Class Priority B
HR	€0.44	€0.43	50 g	D+3	Letter
HU	€0.39	€0.37	50 g	D+?	Standard Letter
IE	€1.10	€1.07	100 g	D+1	StandardPost
IS	€1.52	€1.46	50 g	D+3	Regular Letter
IT	€1.10	€1.08	20 g	D+4	Posta4
LT	€0.65	€0.62	20 g	D+2	Small letter-post item
LU	€0.80	€0.77	50 g	D+1	Standardbrief
LV	€1.20	€1.16	20 g	D+?	Ordinary Letter
MT	€0.30	€0.30	50 g	D+1	Local letter
NL	€0.96	€0.93	20 g	D+1	Brief
NO	€1.90	€1.83	20 g	D+2	digital Stamp
PL	€0.78	€0.74	350 g	D+3	List zwykly Ekonomia
PT	€0.54	€0.54	20 g	D+3	correio normal
RO	€0.53	€0.51	50 g	D+5	Domestic letter mail service prority
SE	€1.26	€1.23	50 g	D+2	Letter
SI	€0.55	€0.54	20 g	D+?	Standard Letter
SK	€0.65	€0.63	50 g	D+2	Letter
ø	€0.90	€0.87			

<sup>&</sup>lt;sup>11</sup> Source: Postal companies' websites/Eurostat

# Annex 4: overview of nominal and real prices for a compact letter (D+X)<sup>12</sup>

Country	Nominal price domestic compact letter	Real price domestic compact letter	Weight	Delivery speed
AT	€1.30	€1.26	75 g	D+2
BE	€1.19	€1.15	50 g	D+3
BG	€0.33	€0.32	50 g	D+2
CH	€0.87	€0.86	100 g	D+2
CY	€0.34	€0.33	50 g	D+1
CZ	€0.77	€0.74	50 g	D+1
DE	€1.00	€0.97	50 g	D+1
DK	€1.61	€1.58	50 g	D+5
EE	€0.90	€0.86	250 g	D+1
ES	€0.85	€0.82	50 g	D+2
FI	€1.85	€1.81	50 g	D+4
FR	€2.32	€2.27	100 g	D+2
GR	€1.40	€1.39	50 g	D+3
HR	€0.44	€0.43	50 g	D+3
HU	€0.39	€0.37	50 g	D+3
IE	€1.10	€1.07	100g	D+1
IS	€1.52	€1.46	50 g	D+3
IT	€2.60	€2.55	50 g	D+4
LT	€0.75	€0.72	50 g	D+2
LU	€0.80	€0.77	50 g	D+1
LV	€1.47	€1.42	100 g	D+?
MT	€0.30	€0.30	50 g	D+1
NL	€1.92	€1.87	50 g	D+1
NO	€2.50	€2.40	50 g	D+2
PL	€0.78	€0.74	350 g	D+3
PT	€0.75	€0.74	50 g	D+1
RO	€0.53	€0.50	50 g	D+5
SE	€1.26	€1.23	50 g	D+2
SI	€0.69	€0.68	50 g	D+?
SK	€0.65	€0.63	50 g	D+2
Ø	€1.11	€1.08		

<sup>&</sup>lt;sup>12</sup> Source: Postal companies' websites/Eurostat

Country	Nominal price domestic large letter	Real price domestic large letter	Weight	Delivery speed	
AT					
BE	€5.95	€5.76	1 kg	D+3	
BG	€0.74	€0.72	500 g	D+2	
СН					
CY	€0.56	€0.55	500 g	D+1	
CZ	€1.09	€1.05	500 g	D+1	
DE	€1.60	€1.55	500 g	D+1	
DK	€8.07	€7.91	2 kg	D+5	
EE	€2.70	€2.58	500 g	D+1	
ES	€2.70	€2.62	500 g	D+2	
FI	€7.40	€7.24	1 kg	D+4	
FR	€6.00	€5.87	500 g	D+2	
GR	€2.90	€2.88	1 kg	D+3	
HR	€1.17	€1.14	500 g	D+3	
HU	€1.17	€1.11	500 g	D+3	
IE	€3.40	€3.32	500 g	D+1	
IS	€2.45	€2.36	500 g	D+3	
IT	€5.40	€5.30	1 kg	D+4	
LT	€0.90	€0.86	500 g	D+2	
LU	€1.60	€1.54	500 g	D+1	
LV	€1.86	€1.80	500 g	D+?	
MT	€3.05	€3.03	500 g	D+1	
NL	€4.50	€4.37	2 kg	D+1	
NO	€9.00	€8.65	1 kg	D+2	
PL	€0.78	€0.74	1 kg	D+3	
PT	€1.50	€1.49	500 g	D+3	
RO	€0.61	€0.58	500 g	D+5	
SE	€7.58	€7.37	500 g	D+2	
SI	€1.62	€1.59	500 g	D+?	
SK	€1.10	€1.07	500 g	D+2	
Ø	€3.12	€3.04			

# Annex 5: overview of nominal and real prices for a large letter (D+X)<sup>13</sup>

<sup>&</sup>lt;sup>13</sup> Source: Postal companies' websites/Eurostat

# Annex 6: overview of nominal and real prices for a maxi letter (D+X)<sup>14</sup>

Country	Nominal price domestic maxi letter	Real price domestic maxi letter	Weight	Delivery speed	
AT					
BE	€5.95	€5.76	1 kg	D+3	
BG	€0.84	€0.82	1 kg	D+2	
СН					
CY	€1.60	€1.56	1 kg	D+1	
CZ	€1.33	€1.29	1 kg	D+1	
DE	€2.75	€2.66	1 kg	D+1	
DK	€8.07	€7.91	2 kg	D+5	
EE	€2.85	€2.72	1 kg	D+1	
ES	€5.55	€5.38	1 kg	D+2	
FI	€7.40	€7.24	1 kg	D+4	
FR	€7.50	€7.34	3 kg	D+2	
GR	€3.40	€3.38	1 kg	D+3	
HR	€1.62	€1.58	1 kg	D+3	
HU	€3.56	€3.38	2 kg	D+3	
IE	€9.00	€8.78	2 kg	D+1	
IS	€4.29	€4.13	1 kg	D+3	
IT	€5.40	€5.30	1 kg	D+4	
LT					
LU	€3.20	€3.09	2 kg	D+1	
LV	€2.22	€2.15	1 kg	D+?	
MT	€5.05	€5.01	1 kg	D+1	
NL	€4.50	€4.37	2 kg	D+1	
NO	€9.00	€8.65	1 kg	D+2	
PL	€0.94	€0.89	1 kg	D+3	
PT	€3.50	€3.47	2 kg	D+1	
RO	€0.71	€0.68	1 kg	D+5	
SE	€8.84	€8.60	1 kg	D+2	
SI	€2.64	€2.59	1 kg	D+?	
SK	€1.90	€1.85	1 kg	D+2	
Ø	€4.21	€4.10		D+1	

<sup>&</sup>lt;sup>14</sup> Source: Postal companies' websites/Eurostat

Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2018 to 2022
AT	1%	1%	4%	-2%	4%
BE	22%	1%	17%	5%	51%
BG	0%	0%	3%	-3%	0%
СН	-12%	5%	1%	8%	1%
CY	0%	0%	0%	-3%	-3%
CZ	4%	-1%	-3%	4%	4%
DE	0%	13%	1%	2%	17%
DK	15%	0%	11%	7%	36%
EE	0%	2%	42%	-5%	37%
ES	10%	7%	8%	2%	30%
FI	1%	7%	10%	4%	24%
FR	15%	11%	9%	9%	51%
GR	0%	1%	67%	-2%	65%
HR	0%	0%	7%	-2%	5%
HU	0%	-22%	-8%	3%	-26%
IE	1%	0%	1%	7%	9%
IS	9%	7%	-1%	4%	19%
IT	1%	0%	1%	-2%	0%
LT	45%	0%	0%	24%	80%
LU	3%	13%	1%	-4%	13%
LV	2%	189%	-17%	12%	173%
MT	4%	15%	0%	0%	20%
NL	2%	9%	7%	-2%	17%
NO	8%	4%	-3%	6%	15%
PL	22%	25%	-7%	6%	51%
PT	1%	1%	7%	-1%	9%
RO	-3%	23%	0%	32%	56%
SE	0%	16%	16%	4%	40%
SI	11%	12%	21%	-1%	48%
SK	0%	29%	2%	-2%	29%

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

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

Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2018 to 2022
BE	22%	1%	17%	5%	52%
BG	-2%	15%	-8%	31%	36%
CY	0%	2%	2%	-4%	0%
CZ	0%	3%	-4%	5%	4%
DE	1%	8%	1%	1%	10%
DK	38%	0%	11%	-11%	37%
EE	2%	-1%	39%	-5%	34%
ES	2%	6%	5%	4%	20%
FI	1%	7%	10%	4%	24%
FR	15%	8%	2%	3%	30%
GR	1%	0%	34%	-2%	33%
HR	3%	0%	-1%	-2%	0%
HU	-34%	9%	-7%	7%	-29%
IE	12%	10%	0%	-2%	22%
IS	21%	-3%	1%	3%	22%
П	-1%	1%	1%	-2%	-1%
LT	31%	0%	1%	10%	46%
LU	4%	12%	2%	-4%	14%
LV	2%	61%	3%	5%	78%
MT	0%	45%	1%	7%	56%
NL	2%	-5%	17%	-4%	9%
NO	6%	7%	-3%	4%	15%
PL	-6%	7%	-23%	6%	-18%
PT	3%	0%	0%	-1%	3%
RO	-8%	3%	19%	32%	49%
SE	-4%	17%	16%	4%	34%
SI	8%	11%	13%	-2%	33%
SK	-2%	15%	1%	-1%	13%

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

Country	Change 2018 to 2019	Change 2019 to 2020	Change 2020 to 2021	Change 2021 to 2022	Change 2018 to 2022
BE	22%	1%	17%	5%	52%
BG	0%	11%	1%	12%	26%
CY	-2%	15%	-9%	-4%	-1%
CZ	2%	2%	-5%	6%	5%
DE	1%	4%	1%	-1%	5%
DK	15%	0%	11%	-11%	14%
EE	1%	0%	40%	-5%	34%
ES	2%	1%	3%	4%	11%
FI	1%	-29%	10%	4%	-18%
FR	15%	8%	12%	-12%	22%
GR	0%	1%	57%	-2%	56%
HR	3%	1%	-1%	-2%	0%
HU	0%	6%	-6%	7%	5%
IE	-	-31%	0%	-2%	-
IS	21%	-3%	1%	3%	21%
п	-1%	1%	1%	-2%	-1%
LU	3%	13%	2%	-3%	14%
LV	3%	45%	3%	-13%	34%
MT	3%	20%	1%	4%	29%
NL	1%	6%	6%	-4%	9%
NO	9%	7%	-3%	4%	18%
PL	-4%	6%	-7%	5%	-1%
PT	3%	3%	0%	-1%	5%
RO	-17%	-16%	70%	8%	28%
SE	-2%	18%	15%	-9%	22%
SI	11%	8%	17%	-2%	36%
SK	2%	12%	1%	-1%	15%

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