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

Report

2023 Parcel price comparison for Germany: domestic parcels



Bundesnetzagentur

2023 Parcel price comparison for **Germany: domestic parcels**

August 2023

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1 Introduction

While the letters market in Germany is characterised by a slow but steady decline in mail volumes, the parcel market continues to gain momentum. The total volume of parcels in Germany rose from 3.70bn to 4.51bn items¹ between 2020 and 2021. Revenue amounted to €15.61bn in 2020 in the parcel market as a whole (domestic and international parcels) and increased to €18.73bn in 2021.2 In contrast to the letters market, which is characterised by a lack of nationwide end-to-end competition, six large companies that have their own network infrastructure are active in the parcel market. They accounted for 97% of the revenue³ in 2021. What both markets have in common is that the market for individual items, ie parcels from private customers to private customers or businesses (C2X - consumer to consumer/business) only accounts for a small share of the overall market. Individual items comprise 8% of the parcel market's revenue and 5% of the parcel market's volume⁴ (7% of the letters market's volume).⁵

Due to the distribution of revenue shares between the participants in the parcel market and the provision of end-to-end services in the C2X parcel segment, it is possible to conduct a national comparison of the prices charged for domestic parcels.

This parcel price comparison prepared by the Bundesnetzagentur is intended to be a source of information for the classification of domestic parcel prices charged by market participants operating nationwide. There will be an international comparison of parcel prices in the next report.

It is not possible to conduct an analysis of parcel prices for business customers (B2X - business to consumer/business) at this point as the information about specially negotiated prices required to do so is not publicly available.

¹ See Bundesnetzagentur's report (available in German) "Bericht zum Paketmarkt, Marktdaten und Wettbewerbsverhältnisse" (January 2023), page 8.

² See Bundesnetzagentur's report (available in German) "Bericht zum Paketmarkt, Marktdaten und Wettbewerbsverhältnisse" (January 2023), page 8.

³ See Bundesnetzagentur's report (available in German) "Bericht zum Paketmarkt, Marktdaten und Wettbewerbsverhältnisse" (January 2023), page 14.

⁴ See Bundesnetzagentur's report (available in German) "Bericht zum Paketmarkt, Marktdaten und Wettbewerbsverhältnisse" (January

⁵ See Bundesnetzagentur's report (available in German) "Bericht zum Briefmarkt, Marktdaten und Wettbewerbsverhältnisse" (January 2023), page 13.

2 National parcel price comparison

This national comparison looks at the prices for domestic parcels. The data used for the comparison has been taken from the respective online publications of the companies under review.

In order to compare the parcel prices for national ("domestic") parcels, the prices of the largest parcel service providers operating on the German market that offer domestic conveyance of C2X parcels as a standard service were compared with each other. The companies in question are DHL, DPD Deutschland GmbH (DPD), General Logistics Systems Germany GmbH & Co. OHG (GLS) and Hermes Germany GmbH (Hermes). Other companies such as United Parcel Service Deutschland S.á.r.l. & Co. OHG (UPS) convey mainly B2X parcels and offer primarily courier and express services as standard services. For this reason they were not included in the analysis. The same applies to Amazon Deutschland Transport GmbH.

The comparison of domestic parcel prices was carried out on the basis of the nominal price as there was no need to adjust prices to inflation for the analysis within Germany. In the case of DHL, which is a universal service provider, some of the parcel items⁶ that are part of the universal service are exempt from VAT according to section 4 para 11b of the VAT Act (UStG). These include parcels weighing up to 10 kg.⁷ The other parcel service providers are obliged to pay VAT on all parcel items. Both the gross prices (ie including VAT) and net prices are shown. Gross prices ensure the comparability of end-customer prices.

Furthermore, a comparison is made for all products based on the type of franking used (retail outlet/parcel shop or online franking).

2.1 **Methodology**

In principle, all the C2X products provided by the companies under review (DHL, DPD, GLS, Hermes) as a standard shipping service were used for the comparisons. Express shipping, on the other hand, was not included. The shipping of bulky goods or goods with other formats (eg roll-shaped items) has not been included in the analysis either. The same applies to cash on delivery. This means that the analysis focuses primarily on the products that are part of the universal service provided by DHL.

For all the products covered, both prices for franking (ie the creation of a parcel label) at a retail outlet or parcel shop and online prices were taken into account. This ensures the products that are available exclusively with online franking, such as DHL's "Parcel S" product, were also taken into account. As all companies give customers the option of online franking, for which there is also demand, it is necessary to take the prices of online franking into account.

In addition, only the prices for doorstep delivery of parcels were included in the comparison for all the products included in the analysis. In principle, it is also possible to deliver parcels to a retail outlet or parcel shop. However, not all of the companies under review offer this delivery option for both types of franking

⁶ In accordance with section 1(1) para 2 of the German Postal Universal Service Ordinance (PUDLV) the conveyance of addressed parcels whose individual weight does not exceed 20 kg and whose dimensions do not exceed those laid down in the Universal Postal Convention and its Detailed Regulations are designated as universal service.

⁷ See Federal Ministry of Finance (2020), VAT application decree of 1 October 2010, Federal Tax Gazette (BStBl) I page 846 – updated version (as at 15 December 2020), page 236 et seq.

included in the comparison. Hermes, for instance, only offers delivery to a parcel shop if the customer has opted for online franking in advance. DPD clearly indicates that only online prices are available for parcels delivered to a parcel shop.

All products used in the comparison are also expected to have comparable features such as liability and tracking and tracing. As in the previous parcel price comparison conducted in 2022, the DHL products "Päckchen S" and "Päckchen M", which do not include liability or tracking and tracing, are therefore not considered in the following comparisons.

The products of DHL are shown as examples in the following figure; for the sake of completeness, the products "Päckchen S" and "Päckchen M" are also listed. Annex 1 contains a complete list of the products offered by all four companies with their respective features (weight, maximum dimensions, girth⁸, delivery speed, tracking and tracing, and liability). Annex 2 contains an overview of the gross prices of the products since 2020.

Product	Weight	Maximum di	mensions	Girth	Delivery speed	Tracking and tracing	Liability		2023 Gross prices		2023 Gross prices nline franking	incl
		Length x width x height	Longest + shortest side	Length + 2 x width + 2 x height				Doorstep delivery	Delivery to a retail outlet or parcel shop	Doorstep delivery	Delivery to a retail outlet or parcel shop	VAT
Päckchen S	up to 2 kg	35 x 25 x 10 cm			1-2 working days	12		€3.99	€3.99	€3.99	€3.99	_
Päckchen M	up to 2 kg	60 x 30 x 15 cm	207	<u> </u>	1-2 working days	122		€4.79	€4.79	€4.79	€4.79	
Parcel S	up to 2 kg	60 x 30 x 15 cm		-	1-2 working days	Yes	€500.00		-	€5.49	€5.49	=
Parcel M	up to 5 kg	120 x 60 x 60 cm		max. 300 cm	1-2 working days	Yes	€500.00	€6.99	€6.99	€6.99	€6.99	-
Parcel L	up to 10 kg	120 x 60 x 60 cm		max. 300 cm	1-2 working days	Yes	€500.00	€10.49	€10.49	€10.49	€10.49	-
Parcel XL	up to 31.5 kg	120 x 60 x 60 cm			1-2 working days	Yes	€500.00	€19.99	€19.99	€19.99	€19.99	Yes

Figure 1: DHL products

The products subject to comparison were identified based on the product range shown by the respective companies. The allocation and relevant factors for this are outlined below. The products used for the comparison are defined differently by the companies under review. As shown in Figure 1 above, DHL distinguishes between products mainly according to their weight. Although the respective parcel must have certain dimensions (eg L x W x H) 9 , it is the specified weight that is above all the limiting factor. By contrast, the products of DPD, GLS and Hermes are primarily determined by individually specified maximum dimensions. Here it is the sum of the longest and shortest side, or the girth, that are of particular relevance. 10 Although all three companies also indicate a maximum possible weight per product, it is identical for all products and, generally speaking, should not determine which product group a particular parcel comes under. Due to these diverging product classifications, it is not possible to draw a direct comparison between the products of DHL and the products of

Although DHL does not specify a maximum dimension for the sum of the longest and shortest side, the respective sum of the longest and shortest side for all DHL products can be derived from the information provided by DHL on the maximum possible dimensions of the parcel (L x W x H). The classification of the companies' products is therefore based primarily on this criterion, namely parcel size. For the comparison undertaken here, the five product groups "Parcels up to 35 cm", " Parcels > 35 to 50 cm", " Parcels > 50 to 70 cm", " Parcels > 70 to 90 cm" and "Parcels over 90 cm" were created based on the maximum values shown by the other three companies for the sum of the longest and shortest side, and the respective products of all the companies under review were allocated to the corresponding groups. However, this approach, which is necessary for the sole reason that the companies have different definitions for their products, means that

⁸ The girth is calculated as the length of the parcel + 2 x width + 2 x height.

⁹ Length x width x height

¹⁰ See Annex 1.

DHL's products are sometimes found in several of the five product groups. It needs to be examined more closely in each individual case which products can ultimately be compared with each other. This individual case analysis is reflected within the framework of the (graphic) evaluation of the comparisons, provided it is relevant for the corresponding product group. The aim is to ensure, if possible, that all companies are represented with one product in each product group.

The other product features such as delivery speed do not play a crucial role in the national comparison, as generally speaking there are no significant differences between the companies, which would not be the case, for example, in a Europe-wide comparison. The features of the products used for comparative purposes can be found in the overview in Annex 1.

The individual comparisons with the corresponding products are shown below.

2.2 Conducting the comparison

The products assigned to each of the above-mentioned product groups are listed first and the prices are then compared in the next step. The prices for each product group are compared separately based on the type of franking used (retail outlet/parcel shop and online franking). According to information in the FAQs on the company website, DPD only accepts online payment for its products. Any special features of a product are provided.

2.2.1 Product group 1: parcels up to 35 cm

Product group 1 includes all products whose sum of the longest side and shortest side is 35 cm or less.

The following figure shows all the products that are assigned to product group 1 based on this criterion, indicating their respective features:

Product group 1: parcels up to 35 cm

Service provider	Product	Weight	Maximum dimensions		Girth	Delivery speed	Tracking and tracing	Liability
•		-	Length x width x	Longest + shortest side	Length + 2 x width + 2 x height	<u></u>	-	-
DHL	Parcel S	up to 2 kg	60 x 30 x 15 cm	75 cm*		1-2 working days	Yes	€500.00
DPD	XS	max. 20 kg		up to 35 cm	max. 250 cm	1-2 days	Yes	up to €520.00
GLS	XS	max. 40 kg	200 x 80 x 60 cm	max. 35 cm		1 day (Mon-Fri)	Yes	up to €750.00
Hermes	Päckchen	max. 25 kg		max. 37 cm	- 3	approx. 1-2 working days	Yes	€50.00

^{*}derived value

Figure 2: Products in product group 1 (parcels up to 35 cm)

DHL's "Parcel S" product has a derived value of 75 cm for the sum of the longest and shortest side. This means that "Parcel S" actually exceeds the upper limit of 35 cm set for this product group. The product has nevertheless been included in this product group because the actual dimensions of some of the parcels that fall into this product category do not exceed 35 cm and are thus comparable with the products of the other companies in these cases (eg parcels up to 20 x 20 x 15 cm). DHL's "Päckchen S" product was still included in

the product group in the parcel price comparison conducted in 2020 as this product actually meets the size specifications. Because this product does not include liability or tracking and tracing, the "Päckchen S" product, as explained above, has not been included in the parcel price comparison since 2021, as it is not considered to be comparable with the other products.

At 37 cm, Hermes' "Päckchen" product exceeds the upper limit to such a minimal extent that it is comparable with the other companies' products. In addition, this product includes both liability and tracking and tracing. The other corresponding features are also comparable with each other for all the products under review.

For franking at a retail outlet or parcel shop, both the net and gross prices of the products used in the comparison are as shown in the figure below.



Figure 3: Prices for franking at a retail outlet/parcel shop (parcels up to 35 cm)

DHL's "Parcel S" product is only available with online franking, so this product could not be included in the above-mentioned comparison even though it actually belongs in this product group. DPD does not indicate a price for franking at a parcel shop for its "XS" product, meaning this product could not be taken into account in the comparison either. The mean values of the prices for the products under review are €4.75 (gross) and €3.85 (net) and thus up by around 5% compared with last year.

Wherever online franking is used, the net and gross prices for the products under review are as shown in the following figure.



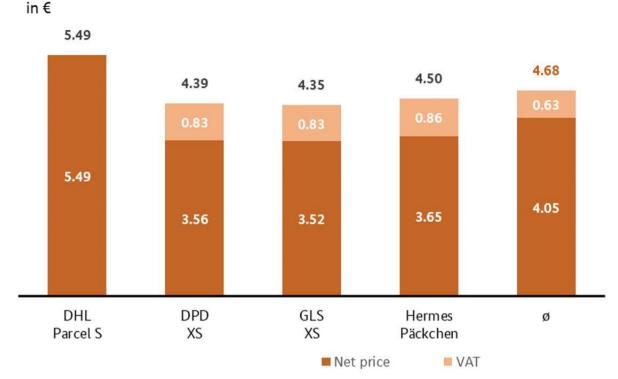


Figure 4: Prices for online franking (parcels up to 35 cm)

DHL's "Parcel S" product and DPD's "XS" product are part of the product group here as both products are available with online franking. Unlike the other companies' products, DHL's "Parcel S" product does not include VAT. The mean value of the prices for online franking of the products under review remained nearly unchanged from last year at &4.68 (gross) and &4.05 (net). The price of DHL's product remained above the mean values.

2.2.2 Product group 2: parcels > 35 up to 50 cm

Product group 2 includes all products whose sum of the longest and shortest side is between 35 cm and up to 50 cm.

The following figure shows all the products that are assigned to product group 2 on the basis of this criterion, indicating their respective features:

Product group	2: parcels >	35 up to 50 cm
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Service provider	Product	Weight	Maximum o	dimensions	Girth	Delivery speed	Tracking and tracing	Liability
			Length x width x	Longest + shortest	Length + 2 x width	1	-	
			height	side	+ 2 x height			
DHL	Parcel S	up to 2 kg	60 x 30 x 15 cm	75 cm*		1-2 working days	Yes	€500.00
DPD	S	max. 20 kg	7	up to 50 cm	max. 250 cm	1-2 days	Yes	up to
DI D	3	max. 20 kg		up to 50 cm	max. 250 cm	1 Z days	103	€520.00
GLS	s	max. 40 kg	200 x 80 x 60 cm	max. 50 cm		1 day (Mon-Fri)	Yes	up to
GLJ	3	max. 40 kg	200 x 00 x 00 cm	max. 30 cm		1 day (Woll 111)	103	€750.00
Hermes	S Parcel	max. 25 kg		max. 50 cm		approx. 1-2	Yes	€500.00
ricities	3 Faicet	IIIax. 25 kg		max. 30 cm		working days	163	€300.00

Figure 5: Products in product group 2 (parcels > 35 to 50 cm)

DHL's "Parcel S" product has a derived value of 75 cm for the sum of the longest and shortest side. This means that "Parcel S" actually exceeds the upper limit of 50 cm set for this product group. The product has nevertheless been included in this product group because the actual dimensions of some of the parcels that fall into this product category do not exceed 50 cm and are thus comparable with the products of the other companies in these cases. This applies for instance to parcels between 20 x 20 x 15 cm and 35 x 30 x 15 cm. Parcels below 20 x 20 x 15 cm are by definition already included in product group 1.

The two DHL products "Päckchen S" and "Päckchen M" were still included in the product group in the parcel price comparison conducted in 2020. However, as these products do not include liability or tracking and tracing, they are no longer part of the comparison, as explained above. The other features of the products are comparable for all companies as shown in Figure 5.

If franking at a retail outlet or parcel shop is offered, the net and gross prices for the products under review are as shown in the following figure.



Figure 6: Prices for franking at a retail outlet/parcel shop (parcels > 35 to 50 cm)

DHL's "Parcel S" product is only available with online franking, so this product could not be included in the above-mentioned comparison even though it actually belongs in this product group. DPD offers only online franking for all its products so that the product "S", which is actually also part of the product group, could not be included here. The mean values of the prices for the products under review are €6.23 (gross) and €5.04 (net) for franking at a retail outlet or a parcel shop and thus represent approximately an 11% increase compared with last year. However, it must be taken into account that in the previous year DPD's product was still part of the comparison so the values are not directly comparable with one another.

Wherever online franking is used, the net and gross prices for the products under review are as shown in the following figure.

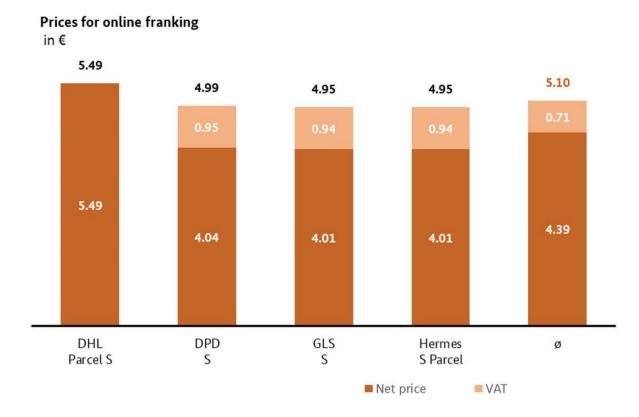


Figure 7: Prices for online franking (parcels > 35 up to 50 cm)

Unlike the other companies' products, DHL's "Parcel S" product does not include VAT. The mean value of the prices for online franking of the products under review remained nearly unchanged from last year at €5.10 (gross) and €4.39 (net). The price of DHL's product remained above the mean values.

Product group 3: parcels > 50 up to 70 cm 2.2.3

Product group 3 includes all products whose sum of the longest and shortest side is between 50 cm and a up to 70 cm.

The following figure shows all the products that are assigned to product group 3 based on this criterion, indicating their respective features:

Service provider	Product	Weight	Maximum di	mensions	Girth	Delivery speed	Tracking and tracing	Liability
=======================================		- :	Length x width x height	Longest + shortest side	Length + 2 x width + 2 x height			3
DHL	Parcel S	up to 2 kg	60 x 30 x 15 cm	75 cm*		1-2 working days	Yes	€500.00
DPD	М	max. 20 kg		up to 70 cm	max. 250 cm	1-2 days	Yes	up to €520.00
GLS	М	max. 40 kg	200 x 80 x 60 cm	max. 70 cm		1 day (Mon-Fri)	Yes	up to €750.00
Hermes	M Parcel	max. 25 kg		max. 80 cm		approx. 1-2 working days	Yes	€500.00

Figure 8: Products in product group 3 (parcels > 50 to 70 cm)

DHL's "Parcel S" product has a derived value of 75 cm for the sum of the longest and shortest side. This means that "Parcel S" actually exceeds the upper limit of 70 cm set for this product group. The product has nevertheless been included in this product group because the actual dimensions of some of the parcels that fall into this product category do not exceed 70 cm and are thus comparable with the products of the other companies in these cases. This applies for instance to parcels between 35 x 30 x 15 cm and 55 x 30 x 15 cm.

Parcels smaller than, for instance, 35 x 30 x 15 cm are by definition already included in product group 2. The DHL product "Päckchen M" was still included in the product group in the parcel price comparison conducted in 2020. However, as this product does not include liability or tracking and tracing, it is no longer part of the comparison, as explained above. The other features of all the products considered in this comparison such as delivery speed are comparable.

For franking at a retail outlet or parcel shop, both the net and gross prices of the products used in the comparison are as shown in the following figure:



Figure 9: Prices for franking at a retail outlet/parcel shop (parcels > 50 to 70 cm)

DHL's "Parcel S" product is only available with online franking so this product could not be included in the above comparison even though it actually belongs in this product group. The same applies to DPD's "M" product, which is also only available with online franking. The mean values of the price for franking at a retail outlet or a parcel shop for the products under review are €7.33 (gross) and €5.93 (net) and thus represent a 1-2% increase compared with last year. As with the previous product group the values are not directly comparable with one another because last year DPD's product was still part of the comparison.

Wherever online franking is used, the net and gross prices for the products under review are as shown in the following figure.

Prices for online franking in €

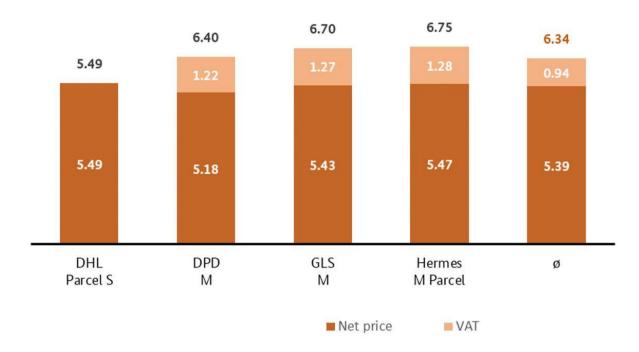


Figure 10: Prices for online franking (parcels > 50 up to 70 cm)

Unlike the other companies' products, DHL's "Parcel S" product does not include VAT. The mean value of the prices for the products under review are €6.34 (gross) and €5.39 (net) and thus up by around 5% compared with last year. As was the case last year, the DHL product is below the respective mean value in terms of gross price and above it in terms of net price.

2.2.4 Product group 4: parcels > 70 up to 90 cm

Product group 4 includes all products whose sum of the longest and the shortest side is between 70 cm and a up to 90 cm.

The following figure shows all the products that in principle can be assigned to product group 4 on the basis of this criterion, indicating their respective features:

Product group 4:	parcels >	70 up to	90 cm
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Service provider	Product	Weight	Maximum di	mensions	Girth	Delivery speed	Tracking and tracing	Liability
		2	Length x width x height	Longest + shortest side	Length + 2 x width + 2 x height			
DHL	Parcel S	up to 2 kg	60 x 30 x 15 cm	75 cm*		1-2 working days	Yes	€500.00
DHL	Parcel M	up to 5 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
DHL	Parcel L	up to 10 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
DHL	Parcel XL	up to 31.5 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
DPD	L	max. 20 kg	1	up to 90 cm	max. 250 cm	1-2 days	Yes	up to €520.00
GLS	L	max. 40 kg	200 x 80 x 60 cm	max. 90 cm		1 day (Mon-Fri)	Yes	up to €750.00
Hermes	M Parcel	max. 25 kg	3	max. 80 cm	" ——	approx. 1-2 working	Yes	500.00€
Hermes	L Parcel max. 25 kg			max. 120 cm		approx. 1-2 working days	Yes	€500.00

^{*} derived value

Figure 11: Products in product group 4 (parcels > 70 to 90 cm)

Due to the fact that product definitions vary among the companies (weight versus parcel size), a large number of products are initially included in this product group. DHL is represented with four products and Hermes with two products in this product group.

In the case of DHL's "Parcel S" product, only a very small proportion of the relevant parcels fall into this product group. This applies to the parcels whose dimensions are between 55 x 30 x 15 cm and 60 x 30 x 15 cm. All other parcels that fall into the "Parcel S" product category have already been considered in the previous three product groups. DHL's products "Parcel M", "Parcel L" and "Parcel XL" actually exceed the maximum limit of 90 cm set for this product group. These products have nevertheless been included in the product group because at least some of the parcels that fall into this product category meet the size specifications, meaning that in theory they are comparable with the other products in these cases. For DHL's three products, this applies to all parcels that are larger than $60 \times 30 \times 15$ cm but smaller than, for instance, $60 \times 30 \times 30$ cm or $70 \times 30 \times 20$ cm. Both Hermes products ("M Parcel" and "L Parcel") fall at least partially into this product group. In the case of "M Parcel", this applies to all parcels whose sum of the longest and the shortest side is 70 to 80 cm, and in the case of "L Parcel" to parcels that are between 80 and 90 cm.

Whether all of the products included in the product group can actually be compared with each other appears to be debatable from the Bundesnetzagentur's perspective. The way in which the products have been combined here results from the fact that due to the lack of uniform specifications among the companies under review it became necessary as an alternative to create product groups. Some products included in product group 4 (such as DHL's "Parcel M" and "Parcel L") seem to fit better into this product group than other products (for instance DHL's "Parcel S" and "Parcel XL") when other features such as weight are taken into account.

DHL's "Parcel S" has for the most part already been taken into account in the previous product groups 1-3 because it meets the relevant size requirements of these product groups. In theory, only a very small number of parcels (for instance parcels between $55 \times 30 \times 15$ cm and $60 \times 30 \times 15$ cm) actually fit into this product group. However, if weight is also taken into account, these parcels probably belong to the "Parcel M" product group. "Parcel S" will therefore not be considered further for the following comparisons. DHL's "Parcel XL"

product exceeds the upper limit of 90 cm specified here, as already explained above, so that only a portion of the parcels in this product category is actually likely to fall into this product group. However, these parcels are more likely to be assigned to the "Parcel L" product when weight is also taken into account. For this reason, "Parcel XL" will not be considered any further in the following comparisons for product group 4.

For franking at a retail outlet or parcel shop, both the net and gross prices of the products used in the comparison are as shown in the following figure:



Figure 12: Prices for franking at a retail outlet/parcel shop (parcels > 70 to 90 cm)

DHL's products do not include VAT, meaning that here too the net and gross prices are identical. DPD's "L" product is only available with online franking, so this product could not be taken into account in the abovementioned comparison. The mean values of the price for franking at a retail outlet or a parcel shop for the products under review are €9.68 (gross) and €8.50 (net). DHL's "Parcel M" is below and its "Parcel L" is now above both mean values due to the price increase that was made for the latter product in 2023. With regard to the average values indicated, it should be borne in mind that DPD's product is no longer part of the comparison and so the average values are not comparable with last year's figures. DHL and Hermes each still have two products in the comparison. If, for instance, only parcels were taken into account for both companies that maxed out the size and weight specifications, selecting the largest possible and heaviest parcel of this product group in each case, then, not including DHL's "Parcel M" and Hermes' "M Parcel", the mean values for franking at a retail outlet or a parcel shop would be €11.48 (gross) and €9.96 (net).

Wherever online franking is used, the net and gross prices for the products under review are as shown in the following figure.

Prices for online franking in €

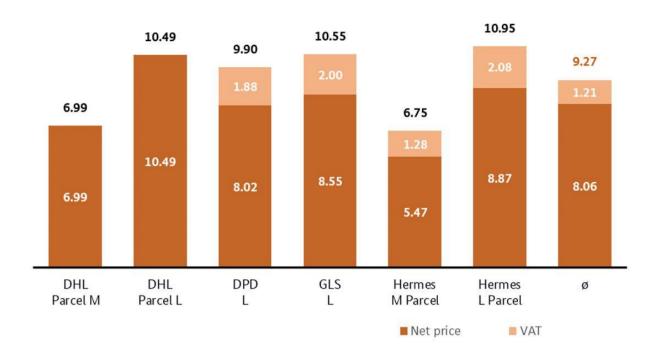


Figure 13: Prices for online franking (parcels > 70 up to 90 cm)

Here too, DHL's products do not include VAT. The mean value of the prices for online franking of the products under review is €9.27 (gross) and €8.06 (net) and thus up by around 5% compared with last year. As was the case last year, DHL charges less for its "Parcel M" product and more for its "Parcel L" product than either average value. With regard to the average values, it should also be borne in mind that the comparison includes two products of both DHL and Hermes. If, for instance, only parcels for both companies were considered that maxed out the size and weight specifications as much as possible, selecting the largest possible and heaviest parcel of this product group in each case, then, not including DHL's "Parcel M" and Hermes' "M Parcel", the mean values for online franking would be €10.47 (gross) and €8.98 (net).

2.2.5 Product group 5: parcels > 90 cm

Product group 5 includes all products whose sum of the longest and shortest side is over 90 cm.

The following figure shows all the products that can in theory be assigned to product group 5 on the basis of this criterion, indicating their respective features:

Service provider	Product	Weight	Maximum dii	mensions	Girth	Delivery speed	Tracking and tracing	Liability
			Length x width x height	Longest + shortest side	Length + 2 x width + 2 x height			
DHL	Parcel M	up to 5 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
OHL	Parcel L	up to 10 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
DHL	Parcel XL	up to 31.5 kg	120 x 60 x 60 cm	180 cm*	max. 300 cm	1-2 working days	Yes	€500.00
OPD	XL	max. 20 kg			max. 300 cm	1-2 days	Yes	up to €520.00
GLS	XL	max. 40 kg	200 x 80 x 60 cm	260 cm*	max. 300 cm	1 day (Mon-Fri)	Yes	up to €750.00
Hermes	L Parcel	max. 25 kg		max. 120 cm	3	approx. 1-2 working days	Yes	€500.00

Figure 14: Products in product group 5 (parcels over 90 cm)

Similar to product group 4, a large number of products theoretically fall into this product group due to the parcel sizes specified by the companies and the differences in product definitions (weight versus parcel size) between DHL and the other companies under review. This means that a total of three DHL products are included in the product group, all of which meet the size requirement of more than 90 cm for the sum of the longest and shortest side.

Whether all of the products included in the product group can actually be compared with each other appears to be debatable from the Bundesnetzagentur's perspective. The combination of the products made in product group 5 results from the fact that it became necessary as an alternative to create product groups due to the lack of uniform specifications between the companies under review. When additional product features such as weight are taken into account, the two products DHL's "Parcel M" and "Parcel L" seem to fit less well into product group 5. Both products are already included in product group 4 (> 70 to 90 cm); the same applies for instance to all parcels up to 60 x 30 x 30 cm and 70 x 30 x 20 cm respectively. In the case of parcels that are larger than the dimensions provided as examples, the weight limits of 5 kg for "Parcel M" or 10 kg for "Parcel L" could potentially mean that these larger parcels come under the "Parcel XL" product. With the intention of allocating just one product per company to each product group, if possible, DHL's "Parcel M" and "Parcel L" will not be considered further in the following comparisons of product group 5 due to the combination of dimensions and weight.

For franking at a retail outlet or parcel shop, both the net and gross prices of the products used in the comparison are as shown in the following figure:

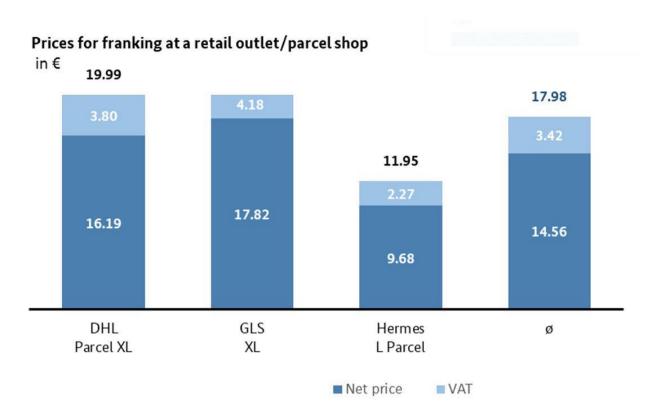


Figure 15: Prices for franking at a retail outlet/parcel shop (parcels over 90 cm)

DHL's "Parcel XL" includes VAT, so that both a gross and a net price are shown, as is the case for the other companies. DPD's "Parcel XL" product is only available with online franking, meaning it could not be taken into account in the above-mentioned comparison. The mean values of the price for franking at a retail outlet or a parcel shop for the products under review are €17.98 (gross) and €14.56 (net). Because DPD's product is no longer included in the comparison, the mean values based on figures from last year are not comparable. As was the case last year, the price of DHL's product is above both mean values.

Wherever online franking is used, the net and gross prices for the products under review are as shown in the following figure.

Prices for online franking in €

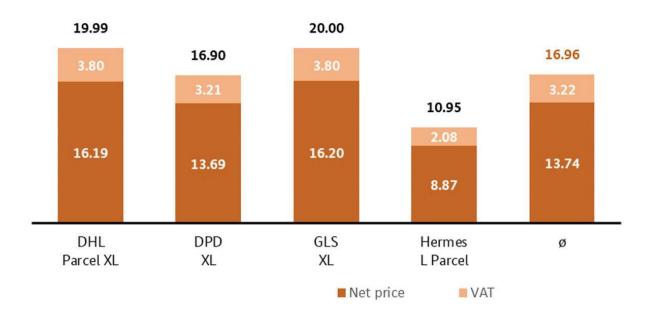


Figure 16: Prices for online franking (parcels over 90 cm)

The mean value of the prices for online franking of the products under review is €16.96 (gross) and €13.74 (net) and thus up by around 7% compared with last year. The price of DHL's product remains above both mean values.

3 Summary

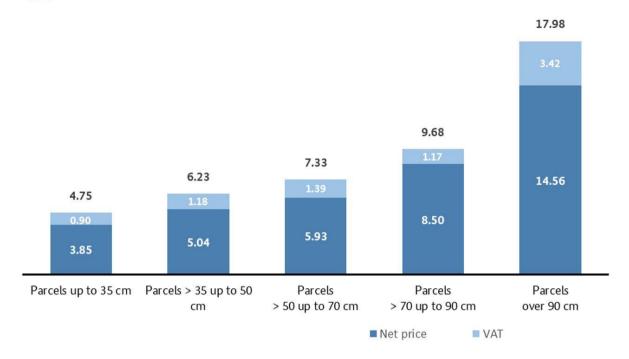
In order to conduct a national comparison of parcel prices, the prices of the largest parcel service providers operating on the German market that offer domestic conveyance of parcels for C2X customers as a standard service were compared with each other. The companies in question are DHL Parcel GmbH (DHL), DPD Deutschland GmbH (DPD), General Logistics Systems Germany GmbH & Co. OHG (GLS) and Hermes Germany GmbH (Hermes).

In principle, all products offered by the companies with standard shipping were used for the comparisons carried out. This means that the analysis focuses primarily on the products that are part of the universal service provided by DHL. Both prices for franking at a retail outlet or parcel shop and for online franking were taken into account for all products. In addition, only the prices for doorstep delivery of parcels were included in the comparison for all the products under review.

The companies under review have different definitions for the products used in this comparison. While DHL distinguishes primarily between products according to weight, the other companies focus on individually specified maximum dimensions (parcel size). Due to these different product definitions, it is not possible to draw a direct comparison between the products of DHL and the products of the other companies. As an alternative, the criterion "sum of the longest and the shortest side" was used to assign the products to the five product groups ("Parcels up to 35 cm", "Parcels > 35 up to 50 cm", "Parcels > 50 up to 70 cm", "Parcels > 70 up to 90 cm" and "Parcels over 90 cm"). This means that some of DHL's products can be found in several of the five product groups.

The mean values of the prices for franking at a retail outlet/parcel shop and online franking for domestic parcels can be taken from the following two figures for all the product groups under review. Both the average gross and the average net prices per product group are shown. DHL as a universal service provider is exempt from VAT on parcels up to 10 kg.

Prices (franking at a retail outlet/parcel shop) - average values in €



Prices for online franking) - average values in €



Whether all of the products included in the product group can actually be compared with each other appears to be debatable from the Bundesnetzagentur's perspective. The way in which the products have been

combined here results from the fact that it became necessary as an alternative to create product groups due to the lack of uniform specifications among the companies under review. Some products included in a common product group seem to fit better into the specific product group than other products when other features such as weight are taken into account. Where possible, additional distinctions were made as part of case-by-case analyses.

For franking at a retail outlet or parcel shop, DHL is not represented in the product groups "Parcels up to 35 cm", "Parcels > 35 cm up to 50 cm" or "Parcels > 50 cm up to 70 cm", as the related product ("Parcel S") is only available with online franking. In the product group "Parcels > 70 cm up to 90 cm", DHL's product "Parcel M" is below and (unlike last year) its "Parcel L" is now above both mean values. In the product group "Parcels over 90 cm", DHL's product "Parcel XL" is above the mean values for both gross and net prices. If online franking is used, DHL's "Parcel S" product is above both mean values in the product groups "Parcels up to 35 cm" and "Parcels > 35 cm up to 50 cm". In the product group "Parcels > 50 cm up to 70 cm" it is below the respective mean value in terms of gross price and above it in terms of net price. In the product group "Parcels > 70 cm up to 90 cm", DHL's product "Parcel M" is below and its "Parcel L" above the mean values. DHL's "Parcel XL" product is above the respective mean values in the product group "Parcels over 90 cm".

Annex 1

Service provider	Product	Weight	Maximum	dimensions	Girth	D elivery speed	Tracking and tracing	Liability
	-	3.5	Length x width x height	Longest + shortest side	Length + 2 x width + 2 x height			8
	Päckchen S	up to 2 kg	35 x 25 x 10 cm	· <u> </u>	40	1-2 working days		241
	Päckchen M	up to 2 kg	60 x 30 x 15 cm		20	1-2 working days	<u>2</u>	
	Parcel S	up to 2 kg	60 x 30 x 15 cm	·-	_	1-2 working days	Yes	€500.00
DHL	Parcel M	up to 5 kg	120 x 60 x 60 cm	: :	max. 300 cm	1-2 working days	Yes	€500.00
	ParcelL	up to 10 kg	120 x 60 x 60 cm	1 0 - 1 0	max. 300 cm	1-2 working days	Yes	€500.00
	Parcel XL	up to 31.5 kg	120 x 60 x 60 cm	-	_	1-2 working days	Yes	€500.00
	xs	max. 20 kg		up to 35 cm	max. 250 cm	1-2 days	Yes	up to €520.00
	S	max. 20 kg	17.0	up to 50 cm	max. 250 cm	1-2 days	Yes	up to €520.00
DPD	М	max. 20 kg	257	up to 70 cm	max. 250 cm	1-2 days	Yes	up to €520.00
	L	max. 20 kg		up to 90 cm	max. 250 cm	1-2 days	Yes	up to €520.00
	XL	max. 20 kg	27	2	max. 300 cm	1-2 days	Yes	up to €520.00
	xs	max. 40 kg	200 x 80 x 60 cm	max. 35 cm	@S	1 day (Mon-Fri)	Yes	up to €750.00
	S	max. 40 kg	200 x 80 x 60 cm	max. 50 cm	9	1 day (Mon-Fri)	Yes	up to €750.00
GLS*	М	max. 40 kg	200 x 80 x 60 cm	max. 70 cm	본	1 day (Mon-Fri)	Yes	up to €750.00
	E L	max. 40 kg	200 x 80 x 60 cm	max. 90 cm	=	1 day (Mon-Fri)	Yes	up to €750.00
	XL	max. 40 kg	200 x 80 x 60 cm		max. 300 cm	1 day (Mon-Fri)	Yes	up to €750.00
	Päckchen	max. 25 kg	X 28	max. 37 cm	62.0	approx. 1-2 working days	Yes	€50.00
Opposition of	S Parcel	max. 25 kg		max. 50 cm	9	approx. 1-2 working days	Yes	€500.00
Hermes	M Parcel	max. 25 kg		× 2	82	approx. 1-2 working days	Yes	€500.00
	L Parcel	max. 25 kg	-	***	-	approx. 1-2 working days	Yes	€500.00

^{*}GLS: send@ParcelShop for online franking

Annex 2

Service rovider	Product		20	020	2	020	2	2021	2	021	2	1022	2	022	2	023	20	023
					Online	franking			Online	franking		-	Online	franking			Online	franking
		incl. VAT	Doorstep delivery	Delivery to a retail outlet or parcel shop	Doorstep delivery	Delivery to a retail outlet or parcel shop	Doorstep delivery	Delivery to a retail outlet or parcel shop										
	Päckchen S		3.79 €	3.79 €	€3.79	€3.79	€3.79	€3.79	€3.79	€3.79	€3.99	€3.99	€3.99	€3.99	€3.99	€3.99	€3.99	€3.99
	Päckchen M	<u> </u>	4.50 €	4.50 €	€4.39	€4.39	€4.50	€4.50	€4.39	€4.39	€4.79	€4.79	€4.79	€4.79	€4.79	€4.79	€4.79	€4.79
DHL	ParcelS	<u> </u>	2		€4.99	€4.99		<u> </u>	€4.99	€4.99	2	12.	€5.49	€5.49		127	€5.49	€5.49
DHL	Parcel M	<u> </u>	7.49 €	7.49 €	€5.99	€5.99	€7.49	€7.49	€5.99	€5.99	€6.99	€6.99	€6.99	€6.99	€6.99	€6.99	€6.99	€6.99
	Parcel L		9.49€	9.49 €	€8.49	€8.49	€9.49	€9.49	€8.49	€8.49	€9.49	€9.49	€9.49	€9.49	€10.49	€10.49	€10.49	€10.49
	Parcel XL	Yes	16.08€	16.08€	€16.08	€16.08	€16.49	€16.49	€16.49	€16.49	€16.49	€16.49	€16.49	€16.49	€19.99	€19.99	€19.99	€19.99
	XS	Yes			€4.28	€3.90	5		€4.39	€4.00	12 - 1 7		€4.39	€4.00			€4.39	€3.29
	S	Yes	4.98€	a	€4.86	€4.38	€5.10	× 7, 69	€4.99	€4.50	€5.10	8 - 37 - 6	€4.99	€4.50	77 8		€4.99	€3.79
DPD	М	Yes	7.02 €	0 - 5 - 0	€6.24	€5.75	€7.20	- T - 0	€6.40	€5.90	€7.20	0_070	€6.40	€5.90	77 8	0 <u>0 - 27</u> 0 - 3	€6.40	€5.19
	L	Yes	11.21 €	9 5 93	€9.65	€9.45	€11.50	S 71 69	€9.90	€9.70	€11.50	0-07:-0	€9.90	€9.70	7. 0	00-170-0	€9.90	€9.69
	XL	Yes	17.06 €	2	€16.47	(A) (A) (A)	€17.50	7 <u> </u>	€16.90	15 15 A	€17.50	277	€16,90	8 <u>. 7</u> 7/ - 8	- T	- 7	€16.90	
	XS	Yes	4.50 €	-	€4.20	€3.50	€4.50	ki <u>.</u> 80	€4.30	€3.50	€4.50	(F 11 2 1	€4.30	€3.50	€5.00	€5.00	€4.35	€3.29
	S	Yes	5.50 €	S	€4.80	€4.20	€5.50		€4.90	€4.30	€5.50		€4.90	€4.30	€6.50	€6.50	€4.95	€3.79
GLS*	M	Yes	7.50 €	S	€6.00	€5.20	€7.50	14 THE TOTAL PROPERTY.	€6.30	€5.40	€7.50		€6.30	€5.40	€7.70	€7.70	€6.70	€5.19
	L	Yes	11.50€	S	€9.70	€9.00	€11.50	16 <u>-</u> 16	€9.90	€9.50	€11.50	8	€9.90	€9.50	€12.00	€12.00	€10.55	€10.00
	XL	Yes	19.50€		€18.70	€18.70	€19.50		€18.90	€18.90	€19.50		€18.90	€18.90	€22.00	€22.00	€20.00	€20.00
	Päckchen	Yes	4.40 €		€4.20	€3.60	€4.50		€4.30	€3.70	€4.50		€4.50	€3.70	€4.50	W 150	€4.50	€3.70
	S Parcel	Yes	5.40 €	*	€4.80	€4.30	€5.55		€4.95	€4.40	€5.95		€4.95	€4.40	€5.95		€4.95	€4.40
lermes	M Parcel	Yes	6.70€	· · · ·	€5.80	€5.25	€6.85	-	€5.95	€5.40	€6.95	1980	€5.95	€5.40	€6.95		€6.75	€5.40
	L Parcel	Yes	11.65 €	8 	€10.65	€10.15	€11.95	-	€10.95	€10.40	€11.95		€10.95	€10.40	€11.95	(4)	€10.95	€10.40

^{*}GLS: Send@ParcelShop bei Online-Frankierung

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Publisher's details

Publisher

Bundesnetzagentur für Elektrizität, Gas, Telekommunikation, Post und Eisenbahnen

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August 2023

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Ruling Chamber 5









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