



Asian Mailing
Association

Singapore, 28/05/2007

Asian Mailing Association

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SUBJECT: PUBLIC CONSULTATION ON DRAFT POSTAL SERVICES REGULATIONS INVITATION TO COMMENT

Dear Sir,

The members of the AMA have reviewed the Postal Services Regulations and have only one concern in the area of the use of CN documentation for incoming – outgoing postal articles.

Potential Postal licensees in Singapore other than the Public Postal Licensee or Postal Administration of Singapore may have agreements with foreign Postal Administrations, who under a bilateral agreement have accepted to treat postal articles under the UPU Acts and as such allow the use of CN documents for the conveyance and delivery of such items.

In response to the UPU IB circular letter 2102(DER.PAR)1473 of 29 November 2004 – Update 4 concerning the national legislation or policy of UPU member countries on ETOEs, Singapore responded as follows:

Does your country agree to the application of the UPU Acts in respect of items received from ETOEs?

No, Mail items received from ETOEs will be treated as commercial mail. See IB Circular 45 of 23 January 2006

Does your country's legislation or national policy authorize the establishment of ETOEs on your country's territory?

National policy does not prohibit the establishment of ETOEs in Singapore. However, Singapore Post Ltd has been granted the exclusive privilege for the conveyance and delivery of letters and postcards within, from and to Singapore until 31 March 2007 and thus ETOEs are not allowed to engage in these activities. However, ETOEs may convey express letter delivery service in Singapore subject to the terms of an IDA

licence. The conveyance and delivery of printed papers and parcels within Singapore is, however, not regulated or licenced by IDA. Moreover, as ETOEs are considered commercial entities, ETOE mail items from and into Singapore are subject to commercial customs clearance procedures.

Given the above in the context of the current liberalization process, the AMA recommends that the policy with regards to the use of CN documentation and ETOE be revised accordingly, in order to guarantee a level playing field for postal articles which are open for competition amongst the licensees.

As an example: there would not be a level playing field amongst licensees if, for postal articles open for competition, the postal administration of Singapore could market such articles for export on CN documents thus benefiting from an expedited customs clearance process at destination whereas the other licensees would have to go through commercial clearance before handing it over the postal administration at destination for distribution by that same administration.

The members of the AMA remain at your service for any further clarification or discussion.

Sincerely yours,

A handwritten signature in black ink, appearing to be 'Carl Schelfhaut', with a stylized, cursive script.

Carl Schelfhaut
President