



**UPS Singapore**

**Response To**

**Consultation Paper Issued By  
The Ministry of Communications and Information and  
The Infocomm Media Development Authority**

**Public Consultation on the Review of the Postal Services Act**

**Responded by:**

UPS Singapore  
31 ALPS Avenue #07-00  
Singapore 498784

**Contact:**

Mr. Lim Chu Kee  
[Ichukee@ups.com](mailto:Ichukee@ups.com)

## **Table of Contents**

<b>S/No</b>	<b>Sections</b>	<b>Page</b>
1	Summary	3
2	Statement of Interest	4
3	Comments	5
4	Conclusion	8

## **1. Summary**

UPS is a global leader in logistics, offering a broad range of solutions including the transportation of packages and freight, the facilitation of international trade, and the deployment of advanced technology to more efficiently manage the world of business. UPS delivers 21.9 million packages and documents each day across more than 220 countries and territories. UPS's Asia Pacific headquarters are located in Singapore.

UPS welcomes MCI/IMDA's review of the Postal Services Act (PSA) to ensure the legislative framework governing Singapore's postal sector remains relevant and appropriate in addressing current market developments, such as the rise of e-commerce. UPS would also like to commend MCI/IMDA's efforts through the amendment bill to facilitate the deployment of the nationwide parcel locker network (Network), and require the Public Postal Licensee (PPL) to provide wholesale access to other logistics service providers for the delivery of non-letter parcels to letter boxes.

UPS has three main comments on the amendment bill. First, we propose for the definition of "parcel" to be further amended to allow for logistics service providers to potentially use the Network for pickups in the future to facilitate return shipments by consumers. Allowing the Network to serve as an alternative to doorstep pickup for consumers will further enhance logistics service providers' productivity and provide consumers with greater flexibility and convenience.

Second, we propose for the PSA to include provision(s) to require the public parcel locker network operator to operate on the basis of fairness and neutrality. This would ensure a level playing field for all logistics service providers participating in the parcel locker network, so that no entity will misuse its position as the public parcel locker network operator to gain an unfair commercial advantage over its competitors.

Third, UPS recommends for MCI/IMDA to require providers of shared postal lockers to adopt a minimum set of cybersecurity standards for their lockers, to ensure measures are in place to secure personal data collected from users of the parcel locker network and to ensure the security of parcels tendered into the parcel locker network.

## **2. Statement of Interest**

As a logistics service provider operating in Singapore for more than 30 years, UPS welcomes the opportunity to make a submission on the draft Postal Services (Amendment) Bill as outlined in the consultation document published by the Ministry of Communications and Information (MCI) and the Infocomm Media Development Authority (IMDA) on 2 December 2020. We are pleased to share our comments in Section 3.

### **3. Comments**

<b>General comments</b>
-------------------------

#### Definition of “parcel”

We note that the proposed definition of “parcel” in relation to a public parcel locker would essentially mean an article which is delivered to the locker by a delivery service provider and collected by the recipient of the article.

Understanding that the nationwide parcel locker network may allow logistics service providers to use the lockers for pick-ups at a later stage to facilitate return shipments by consumers, we propose that the definition of “parcel” be expanded to include articles which will be placed in a public parcel locker by the sender of the article for collection by a delivery service provider. Allowing the public parcel locker network to serve as an alternative to doorstep pickup for consumers will further enhance logistics service providers’ productivity and provide greater flexibility and convenience for consumers.

#### Ensuring cybersecurity for the parcel locker network

We recommend for MCI/IMDA to require providers of shared postal lockers (through a subsidiary legislation to the Postal Services Act for example) to adopt a minimum set of cybersecurity standards for shared postal lockers, ensuring measures are in place to protect personal data from cybersecurity threats and to prevent unauthorised access to parcels tendered into the parcel locker network. MCI/IMDA can draft these cybersecurity standards in consultation with the Cyber Security Agency (CSA).

**Question 1: Please provide views and comments on the proposed inclusion of the new Sections 23A to 23G and amendment to Section 3A of the PSA to accord the Postal Authority the exclusive privilege to install, own and operate the Network in specified premises and appoint a public parcel locker network operator.**

We note that Section 23C would allow the Postal Authority to appoint any person as the public parcel locker network operator, subject to any conditions that the Postal Authority thinks fit.

To ensure fair competition for all logistics service providers providing parcel delivery in Singapore, we propose either for the Act itself to include provision(s), or for conditions to be separately outlined in consultation with the industry, to ensure that the public parcel locker network operator is a commercially neutral third party (with respect to the delivery of parcels), and that an adequate framework is in place to restrict access to and sharing of commercially sensitive data. Such provisions will help ensure that the parcel locker network operates on the basis of fairness and neutrality, and that no entity will misuse its position as the public parcel locker network operator to gain an unfair commercial advantage.

**Question 5: Please provide views and comments on the proposed amendment of Sections 8 and 16, and the inclusion of the new Sections 7A and 17 of the PSA on the regulation of letter boxes.**

UPS welcomes MCI/IMDA's proposal to require the public postal licensee (PPL) to provide wholesale access for the delivery of non-letter items into letter boxes, in which the PPL will help other logistics service providers deliver small parcels into letter boxes at regulated terms and conditions.

Providing such wholesale access will not only level the playing field for logistics service providers in Singapore, but also complement the parcel locker network in reducing the need for doorstep delivery.

#### **4. Conclusion**

UPS would like to thank MCI and IMDA for the opportunity to provide feedback on this important matter and looks forward to being involved in any future deliberations.