

Universal service vs. targeted measures towards vulnerable people: how to address postal users' needs?¹

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1. Introduction

In March 2021, the European Commission published a study by WIK Consult aiming to identify the current needs of business and private postal users given changing communication patterns from paper-based to electronic communications and to evaluate various aspects of the Postal Services Directive in the perspective of the Commission's ongoing evaluation. In particular, WIK Consult noticed that when discussing the future use of postal services, regulators and consumer associations are sometimes concerned about 'vulnerable postal users' within the EU. People with restricted mobility, blind people or people with impaired vision, and inhabitants and SMEs in rural or remote areas are often mentioned in these discussions.

Until now, except for free services for blind and partially sighted people, the regulation of the postal sector has been driven by the principles of universality, non-discrimination, and equity. All users have access to single-piece postal services with the same conditions wherever they live and whoever they are (private households, professionals, SMEs and so on). Through uniform tariffs, the universal service obligation (USO) is a kind of redistribution policy instrument between the poorest and the richest, between more and less costly to deliver areas, contributing to the social and territorial cohesions as already demonstrated by Cremer et al. (2008).

In other sectors, a different choice may have been made and some group of users, considered as "vulnerable", benefit from targeted measures aimed at protecting them. While the core businesses of the postal USO (universal access to letter mail emission services through the physical postal network and the receipt of letter mail at home every day) is challenged by the growth of electronic communications (email, SMS, social networks and so on), refocusing obligations to so-called "vulnerable" users is sometimes viewed as a way to mitigate the challenges faced by universal service providers and to limit the financial burden of USO.

This chapter deals with the pros and the cons of such a change in the way to grasp the societal role of postal operators. In Section 2, the notion of "vulnerable users" is defined thanks to a survey of literature and the measures taken to protect them in some utilities are presented. In Section 3, the drawbacks of targeting postal regulation on this kind of users are listed. Section 4 concludes.

¹ The views expressed in this chapter are personal and do not necessarily reflect the position of the organization to which the authors belong. All errors remain authors' responsibility. We thank Soterios Soteri, Sonja Thiele and Antonia Niederprüm for their relevant comments.

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2. Vulnerability and vulnerable users: some definitions and quantification

2.1. A concept hard to define

The term “vulnerable” is used in many fields, going from psychology to retail, and could have different meanings. In dictionaries, vulnerability is defined as “*the quality of being vulnerable*” and vulnerable as “*the fact of being weak and without protection, with the result to be easily hurt physically, emotionally, or mentally, to be influenced or attacked*”.

Berhuet et al. (2019) found from a literature review of 16 articles in social sciences published between 2004 and 2016 that the notions of « fragility » and « vulnerability » are often used as perfect synonyms even though they are etymologically different. Originally used to define the loss of physical abilities linked to old age and gets the idea that some individuals are unable to give informed consent or are prone to coercions and abuses, today, these words are also used to deal with the potential impact of a natural disaster on population and territories (Bouquet, 2018) or the economic shocks on small firms or systems failure (cyber security vulnerabilities). They recently have largely been used to deal with supply chain difficulties to provide some goods during the COVID-19 crisis.

Here we focus on the notion of “vulnerable consumer”. But even on this restricted scope of analysis, there exists no single, commonly accepted definition (European Union, 2016) and the identification of so-called “vulnerable consumers” is perhaps even more complex. For instance, the British Competition and Markets Authority (2019) defines the term consumer vulnerability in a broad sense, to refer to any situation in which an individual may be unable to engage effectively in a market and distinguishes “market-specific vulnerability” and “vulnerability associated with personal characteristics”.

Personal characteristics often associated with vulnerability are notably the fact to have low income, disability, chronic illness, to be unemployed, old, and to live in rural areas. If some personal characteristics are permanent (notably disability), others could reflect transitory situation (like unemployment). Consequently, vulnerability must be considered as a dynamic concept which evolves over time and circumstances (Berhuet et al., 2019; European Commission, 2016; CMA, 2019).

“Market-specific vulnerability” is also a shape-shifting concept. As underlined by the European Commission (2016) “*consumers may move in and out of states of vulnerability and they may be vulnerable in respect of some categories of transaction but not others*” (p. xvii). It depends notably on the asymmetries of information between consumers and service providers. Ennuyer (2017) insists on the fact that “*vulnerability always occurs in a dynamic and in the interaction between the person and their environment in the broadest sense*” (p. 370).

Moreover, vulnerability is related to the notions of risks and probability: vulnerability refers to an *ex ante* assessment of the likelihood of a potential negative outcome. It is an assessment of risk, rather than a reflection of a negative outcome that has occurred or will occur with certainty. If a person has a given gene, she is more likely than other people to develop a given disease; if a person has limited cognitive capabilities, she is more likely to be abused by ill-intended persons. Nevertheless, this bad experience may never arise: a person at risk of developing a given disease could stay in good health and never get sick and a person easily influenced could never meet malicious people.

So, except when policies or regulation are focused on individuals with physical or cognitive impairments (like the blind and partially-sighted people who already benefit from free postal services), it is difficult to identify *ex ante* a vulnerable consumer.

2.2. A population potentially large

The uncertainties linked to the vulnerability state make the population who may be considered as vulnerable potentially very large, in order to avoid the risk to exclude true vulnerable people from the benefits of the policy implemented.

For instance, Berhuet et al. (2019) listed nine types of “fragility” or “vulnerability” often used to target public policies in France like monetary poverty; disease; disability; unemployment or job insecurity; poor housing etc.

Globally, the authors estimated that two-thirds of the French population face at least one form of fragility. They showed that interactions exist between these different forms of fragility, with cumulative effects. For example, half of French people with poor health (compared to people of the same age) also have a disability or chronic disease (54% against 27% in the general population); poverty is often associated with employment or health problems; poor housing often combined with health, poverty or employment problems etc.

In the same way, Frontier Economics (2020) drew up a regional map of vulnerability in the UK by considering as vulnerable, individuals (i) suffering from communication impairment (blind, partially sighted, deaf or mute people); (ii) who require special medication, medical facilities or assistance, or who have chronic illnesses; (iii) suffering from mental health illnesses, developmental conditions or neurological disorders; (iv) suffering from movement restriction; (v) with dependent children, aged 0-4; (vi) lacking proficiency in English; (vii) aged above 65. The authors admitted it were not possible to fully eliminate double counting, leading to an overestimation of the number of vulnerable individuals. They showed that despite a decrease over the period 2011-2018, on average, one in four British people fall into one of these vulnerability categories. They observed significant variations between regions: almost 30% of individuals in the South West of England are classed as vulnerable; in London and Scotland the median share is only 21.5%. The pensionable age group (more than 65 years old people) accounts for more than 70% of the total number of vulnerable people.

At the “silver society” age, one may wonder if being 65 or more years old is really a handicap. According to Thomas (2019), the elderly living in developed countries are less and less fragile and vulnerable⁴. Health progress, better daily living conditions, a high level of education acquired in childhood and often improved by professional practices, delay entry into the disease.

That being said, we used similar criteria to approximate the number of potential vulnerable persons in France and in the EU: (i) individuals aged above 65; (ii) individuals receiving social

⁴ At the EU level, on average, healthy life expectancy at birth (an indicator of disability-free life expectancy) has increased from 62.2 years in 2010 to 65.1 years in 2019 for women and from 61.3 years in 2010 to 64.2 years in 2019 for men. For women, healthy life expectancy at 65 has increased from 8.5 years to 10.4 years over the same period and for men from 8.4 to 10.2 years (Eurostat, 2021).

benefits⁵ (excluding social benefit for elderly people – in order to avoid double counting as far as possible) or at risk of poverty or social exclusion⁶; (iii) disabled and dependent persons or individuals with self-perceived long-standing limitations in usual activities due to health problem; (iv) individuals with chronic illness; (iv) illiterate people and (v) individuals excluded from the digital society. Table 1 summarizes statistics for France and the EU.

Table 1: number of potentially vulnerable people in France and the EU according to various criteria

	France		EU	
	Million	% of the population	Million	% of the population
People aged above 65	13.7	20.5%	92	20.6%
People receiving social benefits or at risk of poverty or social exclusion	12.5	18.6%	12.5	2.8%
Disabled, dependent people and people with chronic illness or with self-perceived long-standing limitations in usual activities due to health problem	15.7	23.4%	120.5	27%
Illiterate people	2.5	3.7%	75.0	16.8%
Digitally excluded people	11,1	16,5%	138.6	31.0%

Sources: For France: Insee, Drees, Assurance maladie, Caisse Nationale de Solidarité pour l'Autonomie, ANLCI. For EU: Eurostat and final report of the EU High level group experts on literacy 2012 for illiteracy.

In the postal sector, at the request of the European Commission, WIK Consult (2021) discussed and analyzed which potential users' groups might have a greater need for postal services in the future and may experience stronger negative outcomes if prices increase or service quality decreases, taking into account their socio-economic conditions or their capacity to switch to digital alternatives. Based on a stakeholder online survey, WIK Consult concluded that people (i) living in remote and rural areas; (ii) with low income; (iii) suffering from a lack of digital skills; or (iv) from mobility problem, may be more dependent to postal services.

As previously stated, adding figures would have no meaning, since a same individual could cumulate all different vulnerabilities and this way to grasp vulnerabilities is likely to over-estimate the proportion of people who would be effectively adversely affected by the market conditions.

⁵ Social benefits taking into account here are: "Revenu de solidarité active, "Prime d'activité" and "Allocation de solidarité spécifique".

⁶ The poverty and risk of social exclusion indicator created by Eurostat is a combination of three sub-indicators:

- Risk of poverty measures the percentage of people living in a household whose disposable income in the previous year is below 60% of the national median income;
- Severe material deprivation measures the percentage of people reporting in the EU-SILC survey that they cannot financially afford four of the following nine items: (i) paying rent or utility bills, (ii) keeping the home adequately heated, (iii) meeting unexpected expenses, (iv) eating meat, fish or a protein equivalent every other day, (v) going on holiday away from home for one week a year, (vi) buying a car, (vii) buying a washing machine, (viii) buying a television, or (ix) paying for a telephone connection;
- Living in a very low work intensity household measures the percentage of people living in a household whose members aged 18-59 have worked less than 20% of their potential working time (corresponding to full-time work throughout the year) in the past year.

2.3. Examples of measures aiming to protect vulnerable users in utilities

Despite all the difficulties to identify who is vulnerable, in some sectors providing essential goods, public authorities or regulators have made the choice to define such a category of users and taken specific measures to protect them.

In the UK, four regulators – namely Ofwat in the water sector, Ofgem in the energy sector, Ofcom in the communications sector and the Financial Conduct Authority in financial sector – have in their regulatory status the requirement to consider the needs of specific vulnerable groups, particularly those who are disabled, elderly, have low incomes or live in rural areas.

Various measures have been implemented in order to guarantee access to the utilities, at affordable price and to avoid indebtedness situation. For example, all British energy suppliers must record vulnerable consumers in a Priority Services Register. An individual who estimates being vulnerable, could contact his energy supplier and if he is recognized as such, he could benefit from specific services as askance with billing, priority support during interruptions, maintaining connection, and so on. In France, low income households⁷ may benefit from “chèque énergie”, an annual State aid to pay energy bills or to finance energy works to renovate home.

In the telecoms sector, similar measures exist to protect vulnerable people. In particular, the affordability issue of telecoms services is strongly scrutinized by regulators. In a study on the affordability of telecoms services, Ofcom (2020) showed that over last years, in the UK, like in many OECD countries, broadband and mobile customers are getting better services (internet speeds have risen significantly) for less money: on average, households’ expenditure on telecoms has been going down. Moreover, some broadband providers – such as BT, KCOM and Virgin Media – offer cheaper tariffs to help customers on low incomes. In France too, the internet and telecommunication service providers have special offers dedicated to low income households and the latter could benefit from social tariffs (a discount) on their fixed telephone subscription⁸.

Examples of targeted measures exist also in the health or banking sectors. In France, low income people have access to the “Protection Universelle Maladie”, foreigners in irregular situation to a specific medical State aid and financially vulnerable customers are legally defined and could benefit from a specific “client fragile” offer provided by all banks.

The British and French examples cited above are not isolated cases. Almost all EU Member States have implemented policies aiming to protect vulnerable users/consumers through financial or non-financial support measures (European Commission, 2016).

⁷ To benefit from the “chèque énergie”, the household must have a fiscal revenue less than €10,800 per consumption unit (1 individual corresponds to 1 consumption unit, 1 individual more corresponds to 0.5 consumption unit and over 2 persons, each additional individual corresponds to 0.3 consumption unit). The amount of the “chèque” varies between €48 and €277 according the fiscal revenue.

⁸ The persons eligible for social tariffs are: (i) the recipients of active solidarity income (RSA) and whose annual household resources do not exceed a threshold defined by the law, (ii) people who receive the specific solidarity allowance (ASS) or those who receive the allowance for disabled adults (AAH), (iii) war invalids. They could benefit from a tariff reduction of € 6.49 € per month for a subscription to a fixed telephone service offer.

3. Should we replace the universality principle by specific measures targeting vulnerable users in the postal sector?

The digitalization of our societies questions the balance between the social costs and benefits of keeping some universal service obligations (USO) defined 30 years ago in the postal sector. In particular the obligations to collect and deliver at home letter mail at least five days a week, sometimes in D+1, throughout the whole territory and to maintain a huge physical presence through a dense network of postal points of contact generate growing costs while the volume of mail is falling and the footprint in post offices are shrinking.

In this context, the idea to reduce the financial burden induced by USO by restricting its scope to a smaller group of beneficiaries has been evoked. According to us, this is not a relevant solution for several reasons detailed below.

3.1. Targeted measures are generally deceptive

Many studies show that the targeted policies described above are often ineffective: a rather low proportion of the beneficiaries sign-up to the administrative procedures to allow them to benefit from the financial aid or reduced tariffs they are entitled to receive. For instance, in France, in 2018, between 24% and 36% of people who could benefit from the “Protection Universelle Maladie”, did not request it (i.e. between 1.5 and 2.8 million of people); 14% of people in an irregular situation benefit from the State Medical Aid while 70% could theoretically benefit from it. The Cour des Comptes, in its report on the State budget in 2018, estimated that 25% of the potential beneficiaries of the “chèque énergie” did not request it.

In the study on the affordability of telecoms services already mentioned, Ofcom (2020) argued that relatively few customers have taken up the options proposed by service providers to low income people. In France, while 3.7 million people could benefit from the social tariff for their fixed telephone subscription, only 55,600 subscribers had requested it (i.e. 1.5% of beneficiaries) in December 2018 (Arcep, 2020).

In the housing sector, Simon (2000) estimated that in France, 5% of the total number of recipients did not request the financial aid they could have. In the UK, the Ministry of Labour found that between 16 and 22% of potential beneficiaries of housing allowances do not request it for the year 2009-2010 (Bozio and Parraud, 2021).

Last but not least, studies in the USA, England, Canada and France showed that between 30% and 50% of eligible unemployed individuals did not claim their benefits (Blasco and Fontaine, 2010).

Several reasons explain the high rate of non-use of these various rights, including a lack of confidence in the institutions, a lack of knowledge of the mechanisms, and the complexity of the procedures. Moreover, beneficiaries of such schemes are sometimes victims of discriminatory practices (Défenseur des droits, 2014). Sometimes, beneficiaries themselves have an auto-exclusion behavior: even if they have access to health care assistance systems, they do not use their rights and forgo to be treated by fear to be stigmatized or refused. In France, some beneficiaries of “Protection Universelle Maladie” say they feel shame and guilt even if they have not experienced discrimination (Beltran and Revil, 2019). In a study conducted in Geneva on social benefits (Lucas and Ludwig, 2019), some respondents expressed

their fear to be stigmatized especially men who are afraid of no longer being able to play the role they see themselves as playing - the main provider of the family income.

All these examples show that systems that target people who could be considered as vulnerable are not very effective and can generate negative effects. This is why in France, besides specific measures targeting “clients fragiles” in the banking sector, the State has devoted to La Banque Postale a SGEI (“mission d’accessibilité bancaire”) to offer free basic banking services based on the “Livret A” of La Banque Postale. This product is a universal quasi-bank account. It is perceived as non-stigmatizing and is effectively used by vulnerable people for basic banking operations.

3.2. Affordability is not a real issue in the postal sector and the implementation of “social tariffs” would not be justified

If in theory, affordability (defined by Kessides et al. (2009) as the ability to purchase a necessary quantity of a product⁹ or level of a service without suffering undue financial hardship) is a crucial issue for ensuring access to essential services to low income people, in practice, this issue is not so critical in the postal sector (Borsenberger et al., 2012; Borsenberger, 2018). This topic is much more crucial in sectors like health, housing, water, energy or telecoms, justifying specific measures targeting low income people, for two main reasons.

First of all, the capacity to access to food, water, energy, medical care and housing clearly responds to vital needs; postal services not, for the majority of the population. Secondly, the share of households’ consumption budget¹⁰ devoted to postal services (purchase of stamps, pre-paid envelopes, parcels, and so on) through European countries is rather low. The average amount spent on postal services in EU-27 was €13 in 2015, corresponding to 0.05% of average annual households’ consumption expenditure according to the Eurostat Household Budget Surveys¹¹. Even if no affordable limit has been defined regarding expenditure made on postal services, contrary to practices existing in housing, energy or health sector, one could consider such budget share “reasonable”, compared to other utilities¹². Moreover, on average, the budget devoted to postal services both in absolute and in relative terms (percentage of expenditure) has decreased between 2005 and 2015 and one could expect this trend has been continued since then, following the fall in mail volume sent by households despite the price increase observed in most of European countries.

⁹ The World Bank’s International Benchmark on Water Utilities (IBNET), for example, requires utilities to estimate the cost of consuming 6m³ of (piped) water. This quantity of water is assumed to be the lifeline amount for an average household. Any consumption above that minimum level is assumed to be excess to their minimum needs and is therefore a discretionary decision for the household to make, based on their needs and their willingness to pay for additional water (United Nations Children’s Fund and the World Health Organization, 2021).

¹⁰ This is a traditional proxy indicator for affordability that seeks to answer the following question: “what percentage of income would it be reasonable to expect a (poor) household to pay?”

¹¹ 2015 is the last year available for the HBS.

¹² In the housing sector, typically, a part of the gross annual income devoted to mortgage payment (principal and interest) higher than 30% or 35% is considered as unaffordable. In the energy sector, the UK government considers that households are in fuel poverty if they are left with a residual income below the official poverty line when they spend the required amount to heat their home. For water supply, the affordability thresholds (defined as a proportion of annual income) defined by the United Nations Development Program, the World Bank, the OECD, the European Commission or the African Development Bank, vary between 3% and 5% (United Nations Children’s Fund (UNICEF) and the World Health Organization, 2021).

3.3. Access to basic services in rural areas is a global issue not just a postal one

In the public consultation on the Postal Service Directive led by the European Commission in 2020, some stakeholders underlined the importance of access to postal services for some citizens living in remote areas¹³. However, in our view, access to postal services for people living in rural or remote areas is probably not one of their most crucial worries.

In a general way, access to basic services of the everyday life is more difficult in rural and remote areas. People living in rural areas are by definition more dependent to cars (and affected by fuel price increase): in France in 2019, 79.5% of trips was made by car in rural areas against 58.8% in cities between 100 000 and 2 million inhabitants (Jacquin, 2021). Moreover, always in France, time to access to everyday life services (access to shops, schools, health services, etc.) is linked to density (Insee, 2016). For the densest cities, the median time to access to these services is less than 3.5 minutes but in the less dense cities, the median time is around 10 minutes. Regarding access to health services, a French study conducted in 2021 by the main association of majors¹⁴ found that 96% of urban inhabitants have access to emergency services in less than 30 minutes, compared to only 79% of rural inhabitants.

Therefore access to postal services have to be put into perspective for at least two reasons: it is not a vital issue and the number of channels offered to postal users to access to services is growing. Beside the physical network of postal offices, users have access to more and more online services: from the purchase of “stamps” to the sending of registered letters (Borsenberger, 2014).

3.4. Restricting the scope of the universal service to vulnerable users will not reduce its cost

Letter mail and parcel delivery are activities with significant fixed costs, such that economies of scale lead to reductions in unit costs as volumes increase. By restricting the scope of the universal postal service to customers only considered to be vulnerable, these economies of scale effects would be weakened, leading to a higher unit cost of the universal service per user and per service.

Even if the obligation to provide a given service were restricted to vulnerable customers, the universal service provider is likely to be constrained to keep a national infrastructure since potential vulnerable users are distributed over the whole territory – in rural areas but also in urban ones since urban inhabitants could also be touched by other kinds of vulnerabilities like poverty.

In addition, such targeted measures would incur additional costs, in particular to ensure financial support is correctly allocated to vulnerable users.

¹³For the CESI “in many EU countries, and especially in rural areas and in demographic spheres away from digital infrastructure, the postal services are often still the determining means of communication and are therefore indispensable for the social cohesion of the society”. For E-commerce Europe, “Postal carriers keep [rural communities] connected to the global economy, allowing these communities to participate and thrive from a distance”.

¹⁴ <https://www.francebleu.fr/infos/sante-sciences/96-des-urbains-ont-acces-aux-urgences-en-moins-de-30-minutes-contre-seulement-79-des-ruraux-1615385402>

3.5. Relaxing some obligations while preserving the universal dimension of postal SIEG would be probably more efficient

Some features of the USO defined 30 years ago should be relaxed either because they do not respond to current societal needs or because they appear to be more of a convenient feature than an essential need.

For instance, even if “home delivery” remains the mostly preferred delivery option for letters for many postal users who generally disagree with any proposals that reduce accessibility, like the option “community letter boxes”¹⁵ (BIPT,2017); ANACOM,2017; WIK Consult, 2021), in some countries, consumers consider as acceptable alternative delivery locations for parcels additional to home delivery. For instance, in the Baltic countries and Poland, parcel lockers play an important role as delivery location for e-commerce parcels, while in the Nordic countries (notably Sweden) the standard delivery location for parcels is the nearest postal outlet (WIK Consult, 2019). It seems that preferences regarding delivery location of postal items strongly depend among other factors, on the availability of various options.

Yet, more and more alternatives to home delivery of letter mail exist. In particular, several postal operators propose digitalized mail solutions: the U.S. Postal Service launched a program called “Informed Delivery” in 2017 that allows customers to digitally preview their mail; in 2019, Deutsche Post launched a pilot allowing customers to opt to have their mail “e-scanned” (meaning their mail will be opened and scanned, before it is sent to them online).

In this context, one may wonder if home delivery of letter mail meets really a societal need or simply a facility offered for convenience to users for who the value is not reflected in prices. One may wonder if access to postal services in front of the door is more “essential” than home delivery of food or medicines that are vital goods but not considered as SGEI.

The frequency of mail delivery is also questionable. Do we really need five or six days a week delivery for paper letter mail while the volume of instantaneous email and messages delivered through social network and SMS continue to grow?

It is uncontested that in each country, part of the population remains disconnected from the internet or is excluded from the digital society (due to a lack of infrastructure or skills). As explained by Borsenberger (2020), digital exclusion is a curse. However, the societal benefits of the inclusion of those individuals to the digital society would be much higher than trying to compensate shortcomings of digital developments by putting obligations on postal operators. Maintaining postal USO is not the right solution to bridge the digital divide in terms of a long term perspective. It would be more relevant to put in place comprehensive strategies addressing overall broadband coverage, digital skills, and a universal access to internet.

In the same way, concerning disabled people, initiatives like the European Accessibility Act¹⁶ go in the right direction. Instead of sectorial obligations, the Commission plans to introduce an

¹⁵ Community letter boxes are centrally situated letter boxes (e.g. in the center of a village) where individuals and businesses have to collect their postal items.

¹⁶ Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services.

horizontal directive¹⁷ which will allow persons with disabilities and elderly people to benefit from more accessible products and services in the market, at more competitive prices while businesses will benefit from common rules on accessibility in the EU leading to costs reduction, easier cross-border trading and more market opportunities for their accessible products and services.

4. Conclusion

Facing the decrease in mail volume and postal outlets' footprint, questions around the postal users' needs are arising. The idea to replace universal service obligations by targeted measures towards "vulnerable users" which would remain more dependent on postal services and may be more affected by changes in universal service obligations, has been evoked in the political debate.

We consider that putting specific targeted measures to address postal needs of low income, elderly or people living in rural areas, could be counterproductive. On the one hand, due to the protean nature of vulnerability concept, the difficulties to identify *ex ante* vulnerable users and the high risk of non-recourse, such a policy could miss its target (protecting vulnerable users). On the other hand, it would not necessarily reduce the financial burden incurred by postal operators in charge of due to the features of the postal delivery activity cost function.

Counteracting vulnerability requires tackling the root of vulnerability when it is possible; not implementing last resort measures. Meanwhile, a policy based on a universality principle seems to be a better solution to protect consumers who may be at one time or another in their life "vulnerable". However, this does not avoid the requirement to think about the kind of universal services our societies need both today and in a near future, to evaluate their costs and benefits in order to make informed trade-offs between economic efficiency, sustainability, and wider social challenges relating to economic resilience and inclusivity in the post Covid-19 new normal environment.

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¹⁷ The European accessibility act covers products and services that have been identified as being most important for persons with disabilities while being most likely to have diverging accessibility requirements across EU countries. These products and services include: computers and operating systems; ATMs, ticketing and check-in machines; smartphones; TV equipment related to digital television services; telephony services and related equipment; access to audio-visual media services such as television broadcast and related consumer equipment; services related to air, bus, rail and waterborne passenger transport; banking services; e-books; e-commerce.

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