



# Australia Post

## USE OF NOTIFICATION CARDS

December 2008

Report by the Commonwealth and Postal Industry Ombudsman,  
Prof. John McMillan, under the *Ombudsman Act 1976*

REPORT NO. **14|2008**

## Reports by the Ombudsman

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# CONTENTS

<b>PART 1—INTRODUCTION .....</b>	<b>1</b>
Background .....	1
Methodology.....	1
Australia Post response .....	3
<b>PART 2—OPERATIONAL ANALYSIS .....</b>	<b>4</b>
Cards used.....	4
Delivery attempt .....	4
Leaving a card.....	5
Completing a card .....	6
Storage of mail items .....	6
Proof of identity .....	7
Final notices .....	7
Alternative delivery arrangements.....	8
<b>PART 3—COMPLAINT THEMES .....</b>	<b>9</b>
Article left at premises when it should have been carded .....	9
No card left for an article .....	11
Card left in letter box with no attempt made to deliver the article .....	12
Redelivery .....	13
Article unable to be found at post office on presentation of a card .....	14
Someone other than addressee collects a carded article .....	15
<b>PART 4—COUNTER STAFF, POSTAL DELIVERY OFFICERS AND CONTRACTOR TRAINING .....</b>	<b>18</b>
<b>PART 5—CONCLUSIONS AND RECOMMENDATIONS.....</b>	<b>19</b>
<b>AUSTRALIA POST RESPONSE .....</b>	<b>21</b>
<b>APPENDIX 1—EXAMPLES OF CARDS.....</b>	<b>26</b>
<b>APPENDIX 2—ACRONYMS AND ABBREVIATIONS .....</b>	<b>28</b>

## PART 1—INTRODUCTION

### Background

1.1 As part of the mail delivery process, Australia Post makes use of various cards which alert an addressee that an item is awaiting collection at a post office. This process is commonly referred to by Australia Post, and will be referred to throughout this report, as ‘carding’.

1.2 Carding is an important part of the service that Australia Post offers to its customers. Although we understand that Australia Post will make an attempt to deliver all postal items as addressed (subject to a street mail delivery service being available in the area in question), inevitably there will be occasions on which there is no-one at home and an item cannot be left—for example because someone has to sign for the item.

1.3 The notification card advises the addressee that they have mail they can collect. Failure in the process has obvious consequences—an addressee may not get the mail to which they are entitled and which the sender has paid to have them receive. The significance of the issue is underlined by the fact that it is typically the more important mail items—registered mail and parcels, to name but two—that may be carded.

1.4 We have noticed an increase in the proportion of complaints received overall which refer to issues relating to carding. For example, in January 2007, 12 complaint issues were recorded about carding; in January 2008, 35 such issues were recorded.

1.5 Due to the increase in carding-related complaints, the Ombudsman decided in February 2008 to undertake an investigation into the use of notification cards and associated processes by Australia Post.

1.6 In conducting this investigation, our aim was to:

- achieve an understanding of the processes employed by Australia Post involving the use of notification cards
- analyse our complaint data to see if we could identify recurring themes in the complaints about carding that we receive
- explore possibilities for improving those processes with a view to increasing customer satisfaction and reducing complaints both to our office and to Australia Post about carding issues.

### Methodology

1.7 We wrote to Australia Post requesting information on the use of notification cards, and arranged visits to the Carlton and St Kilda South Post Offices to observe how mail held for collection was handled in practice.

1.8 Detailed analysis of approaches received by the Ombudsman for the financial year 2006–07, and 1 July 2007 to 30 April 2008, was conducted.

1.9 Five main complaint themes were apparent.

## Commonwealth Ombudsman—Australia Post: Use of notification cards

- A postal item was left at the address when it should have been carded for collection.
- An addressee was expecting delivery of an item. When it failed to arrive and no card had been left, they made enquiries with their local post office only to find that the item was awaiting their collection. Two sub-themes to this point are:
  - no initial or final notice card is left with the addressee and the item was returned to sender (RTS)
  - the receipt of a final notice is the only indication the addressee has that an item is awaiting collection.
- The delivery officer or contractor made no attempt to deliver an item even though the addressee was at home at the time, but instead left a card in the letterbox.
- An item is carded, but the addressee arrived to collect their item only to be told that it had already been collected by someone unknown to the addressee.
- On presentation of a card at the designated post office, the item was unable to be located, and was subsequently deemed 'lost'.

1.10 Ombudsman staff visited the Carlton Post Office and the St Kilda South Post Office to observe the delivery of held items over the counter, the storage of held items on the premises, the handover process between a parcel delivery contractor and the post office, and the electronic and paper-based recording processes for items being held for collection.

1.11 We received a number of documents from Australia Post in response to our request for information:

Document name	Abbreviation
General Procedures Manual	Procedures Manual
Online help screens for retail outlets available from Electronic Point of Sale system	EPOS Procedures
Licensed Post Office Operational and Accounting Procedures	LPO Procedures
National Mail Contractors—Delivery Guide	Delivery Guide
Proposed Safe Drop Delivery Guidelines	Safe Drop Guidelines
Australia Post Pre-Start Postal Delivery Officer Training Victoria	PDO Pre-Start Training
Australia Post Notification Cards	notification cards, cards

1.12 Copies of cards used in notifying the public in relation to their mail were also supplied and are referred to in this paper by their name and the Australia Post document number.

Description	Use	Number
<b>Card 1</b> —Advice of Postal Item Awaiting Collection	Carded parcel or mail— PO Box use	8834920
<b>Card 2</b> —Postal Item Awaiting Collection	Use by delivery person	8837786
<b>Card 3</b> —Postal Article to be collected ('Sorry We Missed You')	Use by delivery person	8836473

1.13 Copies of these cards are reproduced at Appendix 1. We understand that there are other cards still in circulation as well—for example a blue and white card (8039436).

1.14 Australia Post differentiates between Postal Delivery Officers (PDOs), who are employees of Australia Post, and contracted delivery staff. In many instances, this distinction is immaterial for the purposes of this paper. Where we do not consider that the distinction is a material one we have referred to all individuals involved with delivering the mail to a street or roadside address as 'delivery people': if the distinction is material this is identified in the text.

## Australia Post response

1.15 We provided a draft version of this report, including the recommendation in part 4, to Australia Post for comment. Its response is reproduced in full at the end of this report. We note Australia Post's commitment to take action to reduce incidence of failure of carding procedures, to review the wording on notification cards in relation to redelivery and identification requirements, and review procedures and guidelines relating to 'known to staff' as a form of identification. We will be monitoring progress in these areas on a six-monthly basis for the next two years.

1.16 Australia Post has raised privacy concerns in relation to our suggestion that the identity of the sender should be recorded on the notification card. We consider that these concerns may not be well-founded. Australia Post's addressing standards already require the sender to write their name and address on the outside of a letter or parcel. The sender will obviously be aware that the item will be delivered to the addressee with their name and address on it.

1.17 Our suggestion is that the sender's name and address, as written on the postal item, should be recorded on any card left with the addressee. We cannot see how this raises privacy issues and we remain of the view that it would be desirable for the sender's identity to be recorded on notification cards.

1.18 Australia Post has referred to s 90L of the *Australian Postal Corporation Act 1989* as inhibiting disclosure of the sender's name and address, but does not appear to have considered whether s 90J(2) would permit the disclosure. We suggest that if the only barrier to recording the sender's identity on the notification card is the perceived legal issues, Australia Post should obtain legal advice on this.

## PART 2—OPERATIONAL ANALYSIS

2.1 Australia Post uses a system of notification cards to inform addressees that a mail article is being held at a post office for collection.

### Cards used

2.2 Cards are used in the following circumstances:

- a parcel is too big or bulky to be delivered to the addressee
- delivery of a parcel which is too large to fit into the addressee's letterbox is attempted, but no-one is present to take delivery of the item
- the addressee or other relevant person is unavailable to take delivery of an item requiring a signature
- mail is unable to be left at an address for some reason: for example, when the letterbox is missing, or it is not possible for the delivery person to safely complete a delivery.

2.3 Different cards are used by different operational sections of the delivery process. For example, card 1 (8834920) is used by post office staff specifically for private post box holders. Delivery people use card 2 (8837786) to notify residential and business roadside addressees.

2.4 The standard card left in people's mailboxes is card 2—Postal Article Awaiting Collection, on which there is space for the following information to be entered:

- date the card is left
- whether the card is a first or a final notice
- the addressee of the item
- the time after which the article can be collected
- the address of the post office or mail centre where the article is to be left for collection
- a phone number the addressee can contact to make alternate delivery arrangements
- whether or not the addressee's signature is required
- the type of article
- the number of the article (where one is applicable)
- any charges to be paid on collection of the article
- the name, signature and address of any agent nominated by the addressee to collect the item on their behalf.

### Delivery attempt

2.5 According to the Australia Post General Procedures Manual (procedures manual)—section 5.1.3, delivery people are required to attempt to deliver mail items.

## Commonwealth Ombudsman—Australia Post: Use of notification cards

If the mail box is too small to contain the item, the item can be left with the addressee personally or with a responsible person at the residence.

2.6 The procedures manual lists circumstances (discussed at paragraph 3.20) when a delivery attempt is considered inappropriate: for example, some form of risk is involved.

2.7 Australia Post has recently introduced 'safe drop' delivery arrangements, where parcels that do not require a signature may be left at an address if the addressee is not in attendance. A card is left in the addressee's mailbox advising them of the location of the item. There are preconditions to a delivery person using the 'safe drop' procedure, such as the parcel being undamaged, and there being a suitable place for it to be left out of view of the street and safe from weather and pets. If these conditions are not met, normal carding procedures apply.

2.8 Australia Post has a label system whereby the sender can stipulate that an item be delivered regardless of the presence of the addressee. The label used provides instructions on where to leave the parcel and is pink and therefore identifiable as different from other Australia Post labels likely to be on the parcel.

2.9 Where one of these labels is affixed, the delivery person is required to leave the item in a secure place out of the weather.

### Leaving a card

2.10 The delivery person is required to complete a notification card and leave it in the mail box in the following circumstances:

- The article does not fit in the letterbox and the addressee or some other responsible person is unavailable to accept delivery.
- One of the three circumstances noted at paragraph 3.20 applies.
- The 'safe drop' procedure has been used.

2.11 We understand there are some areas, principally in rural or regional locations, where a parcel delivery to the door is not provided as a standard service. Instead, as a matter of routine a notification card will be placed in the addressee's mail box when they have bulky or signature mail to pick up. The logic of this can be understood against the background that rural properties often have their mail box at some distance from the residence.

2.12 In these areas a specific Advice of Mail Awaiting Delivery card (8834922) was to be used to arrange for the addressee to meet the contractor at a mutually convenient time and date. We understand that card 8834922 is now obsolete, and we assume that card 2 would be used in its place.

2.13 We would expect that people living in these areas will be aware of the arrangement for delivery of parcels in their location. If any complaint were made by a person living in such an area about the sending of a card instead of the delivery of the parcel, we would expect the arrangement to be explained to them by Australia Post.

2.14 For locations in which a parcel delivery to the door is provided, but delivery of a parcel or signature item cannot be completed for whatever reason, the National Mail Contractors Delivery Guide (delivery guide)—section 8-8 encourages delivery people to 'remember to leave the card in the letterbox'.

## Completing a card

2.15 There is no mention in the information provided to us as to when a card is to be completed by the delivery person. We assume that the intent of the instructions is that carding should take place while the delivery person is present at the address and only after attempting delivery (the exception, where a card is left as a matter of routine in some less built-up areas, is noted above).

2.16 Carded items are marked 'Card left' along with the reason for non-delivery, the date, and are initialled by the delivery person. Once the delivery person has completed their round, articles which have been carded are transferred to the nearest post office for collection or to the delivery person's delivery centre or office<sup>1</sup> where they are transferred from the delivery person to the post office in a handover procedure.

## Storage of mail items

2.17 According to the Licensed Post Office (LPO) Operating and Accounting Procedures (LPO Procedures)—section 16.1

Mail should be kept in a place not accessible to the public. Any mail held overnight should be kept under lock and key, wherever practicable.

2.18 It may be reasonably assumed that this is also applicable to corporate post offices.

2.19 There is no instruction on where delivery people are not to leave mail items (such as in their vehicle overnight) or whether or not it is acceptable for articles to be left at the contractor's premises.<sup>2</sup>

2.20 Delivery people are required to count all articles they accept from Australia Post for delivery and have this count verified and signed for by their Manager.<sup>3</sup> Barcoded items are scanned as having been transferred to the delivery person.

2.21 On return of undelivered items to the post office or delivery centre, barcoded items should be scanned back, and a tally made of the number of items returned for collection. There will be a record, either electronic or manual, of all signature items awaiting collection at the post office.

2.22 In the case of an ordinary postal item, there is no way of ascertaining whether it has been delivered or returned for collection, apart from the notification card that should be left. Our observations did not suggest that post offices are required to keep any records of numbers of items awaiting collection in their possession.

2.23 Items awaiting collection are typically held in racks at the post office in street address order. The system for ordering items awaiting collection—whether arranged by address or name of addressee—appears to be at the discretion of the individual post office.

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<sup>1</sup> Procedures Manual—section 5.2.3.

<sup>2</sup> In one complaint we considered, a parcel was not returned to the mail facility, but left with the contractor overnight and delivered to the designated mail facility the next day.

<sup>3</sup> Delivery Guide section 8-3 point 6 and LPO Procedures section 16.27.

## Proof of identity

2.24 On presentation of the card at the designated post office, the bearer collects the item having provided current proof of identity. The need for establishing the identity of the bearer of a card is stated in a number of the documents provided by Australia Post.<sup>4</sup> The 'Postal Article Awaiting Collection' (card 2) states 'This card must be presented at the time of collection and current Proof of Identity will be required'.

2.25 From the information supplied by Australia Post, identification is required for collection of ordinary items as well as signature required items (such as registered and barcoded items).<sup>5</sup>

2.26 Australia Post procedures provide that the identification of the person requesting an item awaiting collection should be established. In the LPO Procedures document states 'The presentation of a Postal Article Awaiting Collection card does not mean mail should be automatically delivered'.<sup>6</sup>

2.27 What constitutes proof of identity is also detailed in the procedures documentation provided<sup>7</sup> and includes:

- either
  - Any Standing Orders held at the outlet
  - Driver's licence
  - Passport
- or
  - any two forms of identification which establish the customer's name, address and signature.
- or
  - a Statutory Declaration.

2.28 Student cards are not considered an acceptable form of photo identification.

2.29 We note at paragraph 3.50 that there is an inconsistency in Australia Post policy documents as to whether identification is required in cases where a person collecting mail is known to staff.

## Final notices

2.30 Articles are retained at the post office for five working days, after which they are re-carded with a final notice giving the addressee a further five working days to collect the item. From the information supplied by Australia Post, the final notice is not a different stationary item from the initial notification card, but is card 2 with a checkbox marked at the top. Items which are signature service, addressed care of post office, or specifically requested to be held, can be held for up to 30 days.

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<sup>4</sup> LPO Procedures—sections 16.9.1 and 1.16.26.7 and in Procedures Manual—section 8.3.1. It is also stated in the information for the Electronic Point of Sale procedures, Counter Mail Delivery General Information, pages 1, 3 and 4.

<sup>5</sup> According to the Delivery Guide Section 8-4 point 3, identification is not a requirement for the delivery of signature items by delivery people.

<sup>6</sup> LPO Procedures, section 16.19.1.

<sup>7</sup> EPOS procedures—Counter Mail Delivery General Information—page 4, LPO Procedures 16.19.2.

2.31 The final notice is sent to the addressee in the general mail. Ombudsman investigation staff saw that some post offices have a practice of using a highlighter pen to bring to the addressee's attention that the notice is a final one. This is done to avoid possible confusion about whether the reminder card relates to a new parcel.

### **Alternative delivery arrangements**

2.32 Where an item is awaiting collection at one post office, but is requested by the addressee to be forwarded to a more convenient pick up location, that item is forwarded by regular mail service. In the information provided, there is no documented direction for the specific handling of the different classes of mail. Mention is made of scanning barcoded mail items, but no other instruction is provided for recording of registered or other signature required items. This issue is discussed in more detail under the heading *Article unable to be found at post office on presentation of a card* in part 3 of this report.

2.33 It states on the Postal Article Awaiting Collection card (card 2):

... or phone [field for phone number] during office hours to make alternative collection or delivery arrangements.

2.34 Recipients could reasonably assume from this that such delivery arrangements could include a subsequent delivery as arranged.

2.35 The Electronic Point of Sale (EPOS) procedures document states 'When the addressee advises that they are unable to collect a carded item and requests an alternate delivery arrangement, where possible, comply with the request'.

2.36 It is unclear as to whether by 'alternate arrangements' a request for a subsequent delivery is included. Without this being made clear, it would be reasonable for addressees to assume that they can request a re-delivery.

## PART 3—COMPLAINT THEMES

3.1 Arising out of our analysis of complaints received for the period 1 July 2006 to 30 April 2008, five main themes were apparent.

- Article left at premises, when it should have been carded.
- No card left for an article.
- Card left in letterbox with no attempt made to deliver the article.
- Article unable to be found at the post office on presentation of a card or lost on transfer to another facility.
- Someone other than the addressee collects a carded article.

3.2 The table below shows the main issues raised and their percentage as a total of all carding issues for the period covered by this report.<sup>8</sup>

Issue	2006–07		2007–08 (part)	
	Number	Percent	Number	Percent
Article left—not carded	12	18%	35	26%
No card left for article	17	25%	40	29%
No attempt made to deliver article	14	21%	23	17%
Article unable to be found at post office	15	22%	20	15%
Someone other than the addressee collected article	6	9%	13	8%

3.3 A number of complaints presented more than one issue, and in the 2007–08 period 29% of issues involved multiple occurrences of the same problem.

### Article left at premises when it should have been carded

3.4 Several complaints have been received about items left at premises by delivery people, but which were subsequently either stolen, or broken open and the contents stolen. Where items are allegedly stolen, Australia Post investigation may show that the contractor remembers leaving the item, suggesting that the theft occurred after delivery. In other complaints, mail items have been dropped over the addressee’s fence and in a number of cases have been subsequently destroyed by the addressee’s dog.

<sup>8</sup> In 2006–07 66 complaints represented 67 issues. In 2007–08 122 complaints represented 136 issues.

**Case study: Left in the open**

Mr A had a watch sent to him from overseas. Customs regulations required that the contents of the item and its value of over \$500 be stated on the outside of the package.

Mr A was not home, but rather than leave a notification card, the delivery person left the package on the doorstep of Mr A's flat in view of passers-by. By the time Mr A got home the watch had been stolen and only the empty packaging was left.

Australia Post accepted that the method of delivery had been inappropriate and compensated Mr A for the value of the lost watch.

3.5 In one complaint the delivery person threw the parcel onto the addressee's front garden where it collided with a brick wall, possibly causing the subsequent damage reported.

3.6 The majority of cases where items have not been carded are the result of operator error. It is a matter of concern that complaints about this issue continue to be made regularly to the Ombudsman. One of the recommendations of this report is that Australia Post considers how the incidence of failure to follow carding procedures by its delivery people can be reduced.

3.7 We have on a number of occasions suggested to Australia Post that it could consider paying compensation in excess of that provided for in its terms and conditions where there has been a clear failure in delivery procedures. We expect to continue to do so in appropriate cases, on the basis that it is unreasonable for Australia Post to rely on the limitation of liability for compensation in its terms and conditions where its delivery people have caused the loss by disregard of published delivery procedures.

3.8 We have noted in the past Australia Post's willingness to consider compensation outside the provisions of its terms and conditions in circumstances where delivery error has caused the loss of an item. We hope that Australia Post will continue to view requests for compensation in excess of that provided for in its terms and conditions favourably, where there have been clear breaches of delivery procedures.

3.9 In principle we do not consider that the 'safe drop' procedures (discussed at paragraph 2.7 above) are unreasonable, and we understand that for many people it will be more convenient to have non-signature items left in a secure place rather than have to collect them or arrange redelivery. We note in particular that where we receive complaints about parcels being left instead of carded, it is because they have been stolen or damaged as a result, or they have been left in an exposed place with the consequent risk of theft or damage.

3.10 The main challenge is to ensure that delivery people follow the 'safe drop' guidelines. We will monitor complaints to the Ombudsman, and will consider investigating further if it appears that the introduction of the 'safe drop' system is leading to items being left at premises inappropriately.

## No card left for an article

3.11 In a number of cases, the addressees later learned that an article they were expecting delivery of was at the local post office, yet no notification card had been left at the addressee's premises.

3.12 In the instructions to delivery contractors they are told to '**Remember to leave the card in the letterbox**'.<sup>9</sup>

3.13 In most cases, a final notice will call the item to the attention of the addressee, although this then leaves a reduced period of time to arrange for collection. In some instances this has resulted in the item being returned to sender before it could be collected. The final notice may also not specify that there is more than one item to be picked up, even though only one card may have been left. This may then lead to the addressee not receiving all items over the counter.

3.14 A number of complainants also stated that the only time they realised that an item had been sent to them was when they were contacted by a sender to whom an article had been returned.

### Case study: No notice

Ms B was expecting a parcel delivery from India, and when it had not arrived went to her local post office to see if it was there. She complained to Australia Post and their investigation showed that there had been an unsuccessful attempt to deliver the item. Ms B did not receive a notification card for the item, nor did she receive a reminder notice. The item was returned to India.

Several months later, another parcel was sent to Ms B, again from India, and again when it failed to turn up she went to the local post office to again be told that the item could not be located. On informing the local post office that she was going to complain to the Ombudsman, the post office staff made further efforts and located the parcel.

Ms B has a locked mail box and any cards left should have been seen by her. Australia Post could not explain why no cards had been left, or why no reminder notice had been sent in relation to the first parcel. Australia Post advised that as no record is kept when the delivery person leaves a card, it could not say with certainty whether a card had been left or not.

3.15 There is no directive as to what delivery people should do in the event that they do not remember to leave the completed card. They are not instructed to return to premises and leave the card, or to draw the post office manager's attention to the failure to leave a card.

3.16 Ways in which cards may be more closely associated with the parcels to which they relate are discussed below. The suggestion made later in this report would bring to the attention of post office staff any parcel that was returned to them for collection but in respect of which no card had been left. The post office could then send a notification card to the addressee, by post.

<sup>9</sup> Delivery Guide section 8-8 point 3.

## Card left in letter box with no attempt made to deliver the article

3.17 As previously stated, for the typical mail round in a built-up area, there is a requirement that an attempt be made to deliver any article which does not fit into a letterbox (for example, by knocking on the person's door).

3.18 In 24% of complaint issues recorded for the period covered by this report, the complainant stated that no attempt had been made to deliver the article, but a card had been left. In at least one case, the complainant stated they were at home at the time the attempted delivery was marked on the card.

3.19 This causes considerable inconvenience to some members of the public, particularly the elderly or disabled. One complainant pointed out that because it appeared that all parcels were being carded and left with the post office for collection, the post office itself had insufficient space to store all the items, reducing the ability for people to enter to transact or to collect items. Other complainants had to make a considerable effort to go to the post office.

### Case study: No delivery attempt

Ms C complained that Australia Post had failed to deliver a registered mail item she was expecting. As she is elderly and had recently returned home from hospital, she was at home all day and no attempt was made to deliver the item. Instead, a card had been placed in her letter box advising her she needed to collect the item from the post office. Ms C does not drive, and would have had difficulty in getting to the post office.

Australia Post made a second attempt to deliver, but unfortunately did so at a time Ms C had advised that she would not be at home. She was then told that no further attempts would be made.

After we contacted Australia Post, the manager of the mail centre hand delivered the item himself. However, if the delivery person had correctly attempted the delivery in the first instance, Ms C and Australia Post staff would not have been inconvenienced.

3.20 There does not appear to be any definition of what is reasonably considered to be an 'attempt to deliver'. There are however, three circumstances listed in Australia Post procedures manuals when entry to private premises is considered inappropriate:

- when the delivery person's vehicle, or the mail on it, would be out of sight of the delivery person if they entered the premises
- where access to the premises is not available (for example, all gates are locked)
- where some form of risk is involved (for example, the presence of a guard dog).

3.21 By not providing clear guidance to delivery people, the instructions are open to interpretation. The Ombudsman is aware of the pressures on delivery people to complete their rounds efficiently. One parcel contractor that we spoke to had over 600 delivery points on his average daily round and more at Christmas. It is understandable that contractors would not wish to spend long periods of time waiting for an answer to a door knock. It is possible that in the interests of saving time, some do not attempt a door knock at all.

3.22 We note above that in rural and regional areas, mail contractors may not call at the property as a matter of course, but will instead routinely leave a card advising of mail to be collected. That may not be unreasonable, for example, in a rural area with long driveways where mail boxes at the end of the driveway are too small to accept parcels.

3.23 There appears to be no formal guidance on this point, and it is unclear what the decision-making process is for designating a particular area or mail round as subject to automatic carding, with no attempt at delivery to be made. In the absence of publicly available criteria, it can be difficult for us to reach a conclusion as to whether the non-availability of 'to the door' parcels delivery in a given area is in accordance with Australia Post policy or, generally speaking, reasonable.

3.24 It would be desirable for Australia Post to formulate specific guidance for delivery people about what 'attempting delivery' means. For this guidance to address the issues that we have identified as part of our investigation, it would need to address:

- whether it is a requirement for delivery persons to go to the door of premises, or use an available intercom system to attempt delivery
- whether the requirements are different for urban, and rural and regional, areas, and if so how they differ
- whether there are areas in which delivery to the door would never be attempted, if so, how such areas would be designated and how customers in that area could find out that their area was subject to that arrangement
- whether the extra time taken to deliver an item to the door where, for example, there is a longer than normal driveway, is a valid reason for not attempting delivery. This may be particularly relevant in areas with some denser and some less dense residential development.

## Redelivery

3.25 An associated issue is what happens when an addressee requests that another attempt be made to deliver a carded item. Notification card 2 states (after saying where the parcel may be collected from):

... or phone ... **during office hours** to make alternative collection or delivery arrangements.

3.26 As noted above, the implication is that a second attempt at delivery can be requested.

3.27 We have dealt with a number of complaints in which Australia Post has declined to attempt a second delivery of an item and an addressee has been told that only one attempt will be made. This appears to be the case notwithstanding that addressees may say that they were at home and no attempt at delivery was made.

3.28 We consider the current wording on the notification card gives rise to an expectation that redelivery of the item, at a time convenient to the addressee, can be arranged. On the face of it, it is unreasonable for Australia Post to refuse to offer a second delivery attempt on the basis that only one attempt will be made for a given item. This is more so in cases where there is reason to believe that the addressee was present at the time the notification card was left.

3.29 We suggest instructions should be circulated to all delivery centres and mail contractors that, in the absence of specific reasons not to do so, a second delivery is to be attempted where requested by the addressee, to align with the information provided on the notification card.

### **Article unable to be found at post office on presentation of a card**

3.30 A common complaint theme is that a person who finds a notification card in their mail box goes to collect it, but it is not located at the post office when they get there.

3.31 There may be a number of reasons for this, one of which is that the item has been given to someone else (see below). Other possibilities are that the item did not get back to the post office; that it has been removed, honestly or dishonestly, from the post office with no record being kept; or that the card itself is a reminder card and the item has already been collected on the strength of the initial card.

3.32 A related complaint theme is that when the item cannot be found, the addressee is powerless to chase it up with the sender, because the addressee was not expecting the item and does not know who might have sent it.

#### **Case study: Mystery sender**

Mr D received a card in his mail, alerting him that an article was awaiting collection. He went to the post office the next day and it was not locatable. He then attended the post office again on subsequent days, and it was still not to be found.

He did not know who the sender was and did not know what the contents were or what the item was, and could therefore not state the value for compensation purposes.

Australia Post conducted an enquiry but was unable to locate the item or even say whether it was a normal mail item or a barcoded item.

3.33 Ombudsman staff had the opportunity to observe the processes adopted by post offices for handing over carded items. On at least one occasion, it proved difficult for staff to find the item. We accept that this will happen in the best regulated of environments and do not seek to level criticism at Australia Post if there is a short delay in finding an item.

3.34 We have, however, investigated complaints in which an item could apparently not be found when the addressee went to collect it, and only after an investigation by us was a thorough search carried out and the item located. This may indicate a level of uncertainty in staff as to whether the item is indeed on their premises.

3.35 The reality is that unless an item is barcoded and therefore scanned or otherwise individually recorded to a particular location, there is no proof that it was ever returned to the post office identified on the card. We have observed the number of items that may be returned to a suburban post office on any given day and understand that the numbers involved will typically run into three figures. This would make it more difficult for staff to identify whether any given ordinary item was among the parcels returned.

3.36 The Ombudsman understands that some post offices routinely register all items returned to them for collection, whether ordinary or bar coded. We consider

## **Commonwealth Ombudsman—Australia Post: Use of notification cards**

that this approach should be adopted by all post offices, and discuss below how this might be facilitated in an environment where scanning of barcoded items is becoming routine throughout Australia Post.

3.37 A source of concern to complainants that has been identified from complaint investigations is their inability to identify the sender of an item that is carded but then lost.

3.38 We consider that this could be avoided if the identity of the sender was routinely recorded on notification cards. We understand that delivery persons would view this as imposing an additional burden on them. However, if the notification card is to be effective, it seems that some way of linking it to the item that was not delivered would be desirable. We question whether the requirement to write the name of the sender and either their street name and number, or postcode, would be a significant imposition.

3.39 Overall we consider that many problems associated with failure to leave a card, failure to identify the sender, and loss of carded items would be alleviated if the card was linked to the undelivered item.

3.40 Currently available technologies allow a card with a peel off bar code to be printed—much as peel-off bar codes are provided on some postal products. We consider that notification cards with peel-off bar codes that could then be affixed to the undelivered mail item would have a number of advantages. The capability to peel a bar code off a notification card and stick it to an undelivered item would:

- allow the card to be uniquely linked to the undelivered mail item
- allow all undelivered mail items to be scanned in to the post office
- allow instances where a card was accidentally not left to be identified and a replacement card sent by the post office
- perhaps allow for greater ease of storage and retrieval of undelivered items.

3.41 We recognise that there is a cost involved in this proposal, and that commercial viability will be an issue for Australia Post. However, we consider that cost considerations should be weighed against the benefits to consumers, and potential efficiency dividends for Australia Post to be achieved from an improved carding system.

### **Someone other than addressee collects a carded article**

3.42 Although the various procedures documents provided by Australia Post require that the identity of persons calling to pick up mail items be verified, either by the provision of identification, standing order or some other arrangement, we were advised on one of our site visits to a suburban post office that typically production of the card would be deemed sufficient for handing over the item. We have no reason to suspect that that is an unusual situation.

3.43 Complaints have been received by the Ombudsman which highlight the fact that proper identification is not always sought. Fifteen complaints were identified from the data we analysed stating that an item an addressee held a card for had been given to someone else. In at least one case the person incorrectly given the article had a different family name to the addressee, which started with the same initial letter.

**Case study: Same name, different address**

Ms E received a notification card to collect a parcel. When she went to the post office a few days later, she was told that it had already been picked up.

It transpired that Ms E's item had been collected by an estranged relative, who shared the same surname as her, but had a different address. By coincidence, he had had an item awaiting collection as well, but he had been given the wrong one. When asked to return the wrongly-collected item he denied it was in his possession any longer.

3.44 We recognise that there are community service imperatives that require a balance to be struck between over-zealous requests for identification and the correct counter delivery of mail. However, we consider that that balance should be resolved in favour of mail security where possible.

3.45 The notification card presently left states that identification will be asked for when an item is picked up. We do not consider that most people would find that unreasonable. We note, though, that the card does not indicate what an acceptable form of identification might be.

3.46 Our preliminary view is that proof of identity should be requested whenever a carded item is picked up, and to reinforce this, that the identification produced should be recorded. Australia Post currently has in place facilities for recording the identity of persons sending packages overseas. We assume that this could be extended to recording the identity of persons picking up mail items for collection.

3.47 We have already indicated above our view that all items being held for collection should be registered somewhere, and to require proof of identity and a signature for all items would be consistent with that view. The community service consideration referred to above could be considered in assessing an acceptable form of identification.

3.48 We have encountered cases where a student card with photograph has been rejected as appropriate identification for collection of an item. Where an identification card like this bears a photograph resembling the customer and the same name as the addressee of the package, we question whether the risk of premeditated forgery is such as to make that identification unsuitable.

3.49 If there are to be limitations placed on what will be considered acceptable identification for collection of some or all mail items, then we suggest that this should be made clear on the notification card.

3.50 Australia Post policy documents are presently inconsistent as to whether 'known to staff' is an adequate form of identification. Section 16.19.1 of the LPO Procedures states 'If the person requesting counter mail is unknown to you, seek proof of identity before delivering the mail'. This implies that if the person requesting the mail is known to the staff member, then it is acceptable for the mail to be handed over. At section 16.19.2 it states in bold italics:

***Note: 'Known to Staff' is not an acceptable form of Proof of Identity.***

## **Commonwealth Ombudsman—Australia Post: Use of notification cards**

3.51 This ambiguity in the guidelines should be amended to make Australia Post's policy on 'known to staff' as a method of identification clear. We accept that there may scope for 'known to staff' to be suitable identification, particularly in rural areas. However, this should be recorded in some way on each pick up occasion.

3.52 If 'known to staff' is to be treated as acceptable, then Australia Post may wish to consider whether it should only be employed where the individual concerned has provided a written release to Australia Post to provide their mail over the counter without formal identification being called for, and whether identification should be verified on the occasion that the release is signed.

## PART 4—COUNTER STAFF, POSTAL DELIVERY OFFICERS AND CONTRACTOR TRAINING

4.1 While a high proportion of PDOs and contracted delivery personnel carry out their job conscientiously and provide a service to the public, some do not comply with good practice or are unaware of correct procedures.

4.2 We understand that provision of training to PDOs differs across states and territories. Australia Post has advised us that in New South Wales and Victoria, instruction on the use of cards is included in a three-day classroom induction.

4.3 Contractors are provided with induction training by either the delivery manager, or by completing an electronic self-paced package which includes delivery procedures.

4.4 Training is provided to sub-contract staff at the cost of the main contractor, who agrees with Australia Post to ensure that new personnel ‘... receive sufficient training so that they will be capable of complying with the provisions of [the] Agreement’.<sup>10</sup>

4.5 Post office staff have an electronic assistance program available to them where there is an EPOS system to provide assistance with procedures. However, it would seem that as there are a significant number of complaints received where the problem arose at the post office, this assistance does not appear to be referred to when necessary.

4.6 While training and education of delivery personnel as a whole is outside the scope of this report, we encourage Australia Post to consider whether refresher training in the use of notification cards may be desirable, particularly in cases where complaints have been received about the actions of a delivery person which point towards failure to comply with policy.

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<sup>10</sup> Supplied by Australia Post as an extract from the contract between Australia Post and mail delivery contractors.

## PART 5—CONCLUSIONS AND RECOMMENDATIONS

5.1 The issues identified in this investigation are not new. They have been identified as arising repeatedly in the context of complaints to this office. The aim of this report is to highlight areas of concern and to promote discussion as to possible solutions.

5.2 Complaints about the carding of mail items are particularly significant because carded items—parcels, registered items and the like—tend to be more valuable mail. Any action that can be taken to reduce the incidence of loss and damage to carded mail may therefore have a particularly beneficial effect in reducing the loss suffered both by Australia Post and by members of the public when problems occur.

5.3 This report makes a number of suggestions for improvement and the Ombudsman considers that a response to the issues discussed will be of benefit to all parties. We recognise that these may have cost consequences, and we do not wish our investigation to have been an exercise in unrealistic window shopping for solutions.

5.4 That said, we consider the solutions discussed in this report are technically feasible and not obviously uncommercial, given their potential to improve customer service and reduce rates of mail loss and customer dissatisfaction. If Australia Post is of the view that any of these suggestions are not viable, it should advise what steps it considers can be realistically taken to address the problem at hand.

5.5 The Ombudsman recommends that Australia Post review its policies and procedures in relation to the use of notification cards, and prepare a report that addresses the issues set out below.

- Measures to reduce the incidence of failure to follow carding procedures by Australia Post's delivery people.
- Guidance to delivery people about the circumstances in which they should go to the door of premises, or use any available intercom system, to attempt delivery, including:
  - whether the guidance should differ for PDOs and mail contractors, and between urban and rural and regional areas
  - mail delivery areas in which no attempt will be made to deliver to the door, and how customers in any such area will be notified there is no parcel delivery to the door
  - whether the decision to deliver an item to the door will be affected by factors such as the length of a driveway.
- Steps that can or should be taken to redeliver to the door, when requested by a customer.
- Whether the practice adopted by some post offices of recording all items held for collection should be made a universal requirement, and if not, the minimum practice that should be followed by post offices.
- Whether the identity of the sender should be recorded in some fashion on the notification card, and the best way of doing this.

## Commonwealth Ombudsman—Australia Post: Use of notification cards

- Whether Australia Post should introduce notification cards with peel-off bar codes for affixing to undeliverable items, and if not, other steps that can be taken to establish a link between a notification card and the item to which it relates.
- The form of identification to be produced by a person picking up a carded mail item, including:
  - whether identification should be required in all cases, and if so, how that identification should be recorded
  - if restrictions are imposed on the form of identification that will be accepted, how those restrictions should be advised on the notification card
  - whether all items must be signed for on collection
  - whether 'known to staff' will be accepted as of a means of identification, and if so how the risk associated with that practice can best be managed.

## AUSTRALIA POST RESPONSE



Our Ref: 08000843

11 December 2008

Professor John McMillan  
Postal Industry Ombudsman  
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CANBERRA ACT 2601

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Dear Professor McMillan

Thank you for your letter (Ref: 2008 - 300058) of 10 October 2008, inviting comment on the draft report of your own motion investigation into Australia Post's use of notification cards.

Our responses to the individual recommendations in the draft report are contained in the attachment to this letter. A number have been accepted and will be implemented, while others are subject to commercial or practical constraints as indicated.

By way of general comment, I would make the point that Australia Post, as a matter of course, is continually reviewing its operations and making changes to its processes and procedures. The parcel delivery function has for instance recently undergone a significant change with the introduction of the safe drop arrangements, which will also impact the number of parcels carded and held at retail outlets for collection.

There will however always be issues of compliance where manual procedures are involved. While fully acknowledging the impact on individual customers, given that some 40 million parcels plus other articles are subject to carding each year, we believe that the overall incidence of failure with Australia Post's delivery services generally is very low.

It is thus a question of whether there are changes that can be made to procedures in the operational environment that would significantly improve compliance and lessen errors. Any proposed changes need to be assessed in terms of both their operational and commercial viability. This includes the time taken to complete tasks and the impact on service cost/pricing.

In that regard, it needs to be borne in mind that the services that are subject to carding are not reserved to Australia Post. The parcels market in particular is highly competitive and extremely price sensitive, with customers having a range of providers from which to choose.

Thank you again for the opportunity to comment on the draft report – we would be happy to discuss any particular matters further, as required.

Yours sincerely

A handwritten signature in black ink, appearing to read "Michael McCloskey". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Michael McCloskey

Attachment

**Conclusions and Recommendations in the Postal Industry  
Ombudsman’s Draft Report on the Use of Notification Cards.**

**Australia Post Comment/Response.**

**Measures that can be taken to reduce incidence of failure to follow  
carding procedures.**

A national parcel scanning compliance program is currently being implemented to drive compliance by contractors in the delivery of parcels in accordance with delivery procedures.

A national communications program will be undertaken to parcel contractors to reinforce the requirement that delivery of parcels is a “to the door” service and that parcels are not to be carded unless delivery has been attempted by attending the address and establishing no-one is in attendance to accept the article for delivery.

Communications material will be prepared including a Parcel Contractor Advice, Toolbox Talk and article in Contractor News outlining Australia Post’s policy and procedures for delivery and carding of articles.

Where required the contractual provisions regarding non compliance will be enforced. This can involve formal warnings or notices of breach of contract depending on the nature and extent of the failure to comply.

**Guidance that can be given to delivery staff about the circumstances in  
which they should go to the door of premises.**

The parcel delivery guidelines clearly identify that the first action required is to attempt delivery of the parcel. There should be no circumstances under which a parcel is carded without a delivery attempt. This will be reinforced as part of the national communications program referred to above.

In built up areas Australia Post provides a street delivery service where the postal delivery officers and parcel contractors deliver signature items and large parcels to the door. In rural areas Australia Post provides a “to the property” or roadside delivery service. As such mail delivery contractors are only required to deliver to a letter box on the boundary of the property, but many contractors will deliver parcels to the door if this practicable.

We believe that this informal arrangement works to the benefit of many households in rural areas. Residents can of course decide to provide a large enough receptacle to accommodate larger mail articles including parcels. Generally the only time that confusion arises is where a customer moves from a residential street delivery area to a country area and has an expectation of delivery to the door.

**Steps that can or should be taken to redeliver to the door when requested by a customer.**

Australia Post does not offer a 'second attempt' delivery service. To provide such an option would add significantly to the cost of delivery overall and would need to be reflected in increased charges. While the current card (8837786) does give the recipient the option of telephoning "to make alternative collection or delivery arrangements", this is a reference to the ability to ask that the item be transferred for collection at a more convenient Australia Post outlet.

The wording on the card will be revised to remove any ambiguity.

**Whether the practice adopted by some post offices of recording all items held for collection should be made a universal requirement, and if not, the minimum practice that should be followed by post offices.**

Routine recording of items is offered to the customer as an addition to our basic service and is represented by premium services such as Registered Post, Express Post Platinum and eParcels. There would be significant cost and price implications associated with any requirement to record the receipt into store and delivery of ordinary parcels. The proposed solution (below) of barcoded cards has merit, but we do not currently have the technological capability at all of our outlets, or the systems to support scanned delivery of all articles.

**Whether the identity of the sender should be recorded in some fashion on the notification card, and the best way of doing this.**

Recording details of the sender on the notification card would raise privacy related issues under both the Australian Postal Corporation (APC) Act and the Privacy Act. In essence Australia Post can only disclose the sender's details with their express consent irrespective of their legal status (natural person, incorporated or unincorporated entity). This restriction applies by virtue of Section 90L of the APC Act. The Privacy Act would further prohibit the disclosure of personal information where the sender is an individual. The disclosure would only be lawful where:

- the sender was reasonably likely to be aware that AP would disclose their details on the notification card; or
- the sender had consented to the disclosure; or
- the disclosure was required or authorised by law.

**Whether Australia Post should introduce notification cards with peel-off barcodes, for affixing to undeliverable items, and if not, other steps that can be taken to establish a link between a notification card and the item.**

This would improve the identification of carded parcels at the time of collection and may allow the storage location to be clearly noted. However, a significant technology investment would be required to progress this initiative – with associated cost/price implications. Consideration will be given to the practicality/viability of this type of delivery enhancement, however its introduction, if approved, could not be expected to occur for some time.

**The form of identification to be produced by a person picking up a carded mail item, including –  
Whether identification should be required in all cases, and if so, how that identification should be recorded.**

Identification is required in all cases, but it is not recorded. The additional services which offer proof of delivery capture the signature of the person accepting delivery. Our current Point of Sale (POS) system does not allow the capture of identification for parcel delivery.

From a privacy perspective, if Australia Post were to record this information it would also have an obligation to protect it from unauthorised access, use, modification, disclosure or other misuse. The systems, processes and workflows necessary to ensure the information was adequately protected would come at considerable cost to the Corporation.

**If restrictions are imposed on the form of identification that will be accepted, how those restrictions should be advised on the notification card.**

Australia Post will review the card with a view to including appropriate identification advice.

A review of the acceptability of identification type will also be conducted.

**Whether all items must be signed for on collection**

This would only be possible if all items were recorded which would have significant cost/price implications (see above).

Signature on delivery is a requirement for a range of premium services, and is reflected in their price structure.

**Whether 'known to staff' will be accepted as a means of identification, and if so, how the risk associated with that practice can best be managed.**

'Known to staff' is not an acceptable form of ID and our procedures generally reflect this. The ambiguity in the LPO Procedures identified in the draft report will be removed. Separately, consideration will be given to whether in certain circumstances (eg in small rural communities) 'known to staff' may be deemed acceptable. If so, appropriate guidelines will be prepared for inclusion in the procedures.

# APPENDIX 1—EXAMPLES OF CARDS

## Card 1

3



..... notice

**Advice of Postal Item Awaiting Collection** (PM23)

Would you kindly present this card at the delivery counter to collect the item indicated below. Proof of identity may be required.

<input type="checkbox"/> Express Post	<input type="checkbox"/> International Insured	<input type="checkbox"/> Reply Paid Service
<input type="checkbox"/> EMS International Courier	<input type="checkbox"/> Customs Collect	<input type="checkbox"/> More to Pay (Additional Charges)
<input type="checkbox"/> Registered Post	<input type="checkbox"/> Receipted Delivery	<input type="checkbox"/> Ordinary Article/Parcel
<input type="checkbox"/> International Registered	<input type="checkbox"/> COD	

Personal attendance of ..... required.

Item No. .... Charges to pay \$ .....

The (✓) indicates the type of item awaiting collection

8834920 • Feb'01

## Card 2

**Postal Article Awaiting Collection** 

Date / / "Tick appropriate box"  
 1st Notice  Final Notice

Name .....

Address .....

Suburb/Town .....

Postcode .....

The article indicated on the reverse of this card can be collected after  
 9.00am  12.00pm  2.00pm  4.00pm today  
 from the Post Office/Mail Centre located at:  
 .....  
 .....

or phone: ..... during office hours  
 to make alternative collection or delivery arrangements.

Personal signature of addressee required  
 Signature of addressee or agent required (see over)

**IMPORTANT:** The article will be held for a limited period. If you cannot collect it or arrange collection within 5 working days the article may be returned to the sender.

This card must be presented at the time of collection and current Proof of Identity will be required.

8837786 • Dec'04

**Type of Article** (✓ appropriate box)

Article Number

Express Post  
 Ordinary Article/Parcel  
 Receipted Delivery  
 Registered Post  
 More to Pay (additional charges)  
 EMS International Courier  
 International Signature Article  
 Customs Collect  
 Other

Charges to Pay \$

Collection Authorisation

To be completed where **personal** signature of the addressee is NOT required and you wish someone to collect the article/s for you.  
**Please allow my agent to collect the above article/s.**

.....  
*Name of Agent* (BLOCK LETTERS)

.....  
*Signature of Agent*

.....  
*Signature of Addressee*

8837786(back) • Dec'04



## APPENDIX 2—ACRONYMS AND ABBREVIATIONS

<b>Delivery Guide</b>	National Mail Contractors—Delivery Guide
<b>Delivery person</b>	A Postal Delivery Officer, or a person providing Australia Post delivery services under contract (not an Australia Post employee)
<b>EPOS</b>	Electronic Point of Sale
<b>EPOS procedures</b>	Online help screens for retail outlets available from EPOS system
<b>Handover</b>	The transfer of items between different staff, business units and/or contractors
<b>LPO</b>	Licensed Post Office
<b>LPO Procedures</b>	LPO Operational and Accounting Procedures
<b>PDO</b>	Postal Delivery Officer (an employee of Australia Post who delivers mail)
<b>PDO Pre-start Training</b>	Australia Post Pre-start PDO Training Victoria
<b>Procedures Manual</b>	Australia Post General Procedures Manual
<b>Safe Drop Guidelines</b>	Proposed Safe Drop Delivery Guidelines