

**44 Ramsden St
Clifton Hill
VIC 3068**

The Postal Industry Ombudsman

Monday, 21 October 2024

Dear Sir/Madam,

The East Clifton Hill Residents Inc ((No A0114110I) (**ECHRI**) Is an incorporated association comprised mainly of local residents in the East Clifton Hill area. On behalf of the members and the wider community it seeks to advance the interests of the community in various ways. Its mandate is set out in its statement of purposes in its Rules.

In September 2024 members drew to the attention of the ECHRI Committee that post office boxes in the area were disappearing. By letter dated 7 September 2024 (sent on 21 September 2024, copy attached) I wrote to Paul Graham, Australia Posts Managing Director and CEO to express the concern of the community. At that time our information was that four of the post boxes in the locality had been summarily removed without any community consultation, although later enquiries suggested that more had been removed.

Within a few days Australia Post, through Anum Faisal, whose job title is 'Resolutions Support, National Resolutions', wrote to me by email. Thereafter he and I entered into an email exchange (attached) to which I refer the Ombudsman.

In my reply to Mr Faisal of 9 October 2024¹, I annexed a map of the immediate locality, showing the three remaining post box locations in the closely developed and populated area, together with the train station. Given that the roundabout at the intersection of Berry and Spensley Streets is what is identified in planning terms as a *Local Activity Centre* with an off-licence, fish and chip bar, wine bar, pizza shop, two hairdressers and a medical clinic with GPs and other clinical services, all of which attract members of the local community in addition to the railway station at the end of the street, it is surprising that Australia Post could only continue to site its post box on Spensley St away from the station beyond Fenwick St.

We understand that the use of 'snailmail' is in decline. Of course many people, particularly those in younger generations, will use alternative forms of communication which are quicker, cheaper and more convenient. However those members of the community of more advanced years still use mail; they are more inconvenienced by having to walk much longer distances to post their letters; they are probably less able to use the Australia Post's locator page² to find the closest

¹ 241009-2 63519541 Removal of Street Posting Box 36 Berry St Clifton Hill VIC 3068.pdf

² As helpfully suggested by Mr Faisal in his email 241009-1 63519541 Removal of Street Posting Box 36 Berry St Clifton Hill VIC 3068.pdf

post box when they arrive at the location they previously used to find the box summarily removed; and may not be able to follow Google Map type indications to walk to the nearest box, even if they can locate it.

On behalf of the community and as Secretary of ECHRI I request that the Ombudsman examine

- (a) the manner in which Australia Post unilaterally removed at least four of the post boxes in the East Clifton Hill area without notice or consultation with the affected community;
- (b) the absence of any consideration of and current refusal to adopt the process suggested by ECHRI of affixing on some appropriate structure in the close proximity of a removed post box, signage indicating the distance to and direction of the nearest active post box to that removed;
- (c) the apparent lack of consideration of community convenience when deciding to remove a number of post boxes in this locality which, if done, might lead to the repositioning of a post box close to the Clifton Hill railway station, to which a sizeable number of the community walk on a regular basis;
- (d) the excuse given by Mr Anum Faisal on behalf of Australia Post that location of a post box close to or on the route to Clifton Hill railway station provides 'accessibility concerns', presumably for the post office employee tasked with collection. As local residents we are satisfied that without difficulty a location could be identified close to the route taken by much of the foot traffic to the station for a box which would then provide a useful and convenient post box for many in the community. We do not believe that Australia Post has done any serious examination of suitable alternative location in the area. My requests for access to the relevant documentation disclosing the extent of alternative location studies have not met with success. No documents were provided but I was invited to make an application under the FOI legislation if I wished to pursue the request.

It is ECHRI's view that the conduct of Australia Post in relation to the removal and failure to properly consider and implement relocation of one or more post boxes to the inconvenience in particular of more elderly residents in the locality is unreasonable, unjust, oppressive and improperly discriminatory. It also appears to be contrary to the Community Service Obligations set out in s.27 of the Australian Postal Corporation Act 1989 which require Australia Post to provide a postal service which is 'reasonably accessible to all Australians wherever they reside' and to comply with the performance standards for the service which 'reasonably meet the social ... needs of the community'.

According to its website Australia Post professes commitment to ‘providing trusted, relevant and reliable services that connect all Australians’.³ We invite the Postal Industry Ombudsman to examine all of the facts raised for consideration and see whether the Ombudsman comes to the like conclusion, in which case under s.19V of the Ombudsman Act 1976 (Cth) we invite the Ombudsman to ask Australia Post to consider whether it will take action to rectify or mitigate a problem which must be affecting numerous communities across Australia, as postal use declines.

We respectfully draw the attention of the Ombudsman to the Executive Summary to the Postal Industry Ombudsman’s Report 01 of March 2009⁴ which states as a fact that “Australia Post seeks the ‘active’ support of a community before making changes to postal delivery arrangements.” In this case the arrangements were addressing postal delivery not collection, but we fail to discern a rational distinction. The report sets out Australia Post’s procedure when seeking to determine community reaction to changes to delivery arrangements as follows:

“In order to measure the ‘active’ support of the community, Australia Post polls those households potentially affected, and changes the delivery arrangements only if at least 50% of the households that were provided with polling documents return them requesting change.”

The Report concluded that

“... Australia Post should review its polling methodology, and should consider moving away from treating a non-response as a ‘no’ vote. Instead, Australia Post should find ways to increase community participation in polls, and if it has a particular threshold for community support that must be reached (for example, the community must ‘strongly’ support change), then the poll should be better designed to measure this.

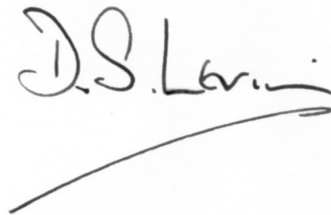
In our case, our suggestion that Australia Post seek to gauge community support for proposed post box removal was rejected. Our suggestion as to the amelioration of the effect of removal of boxes by the placing of adequate signage indicating distance and direction to the closest alternative mailbox was rejected. Our suggestion that proper consideration be given to relocation of a post box to a location frequented by many of the local community has been rejected.

³ <https://auspost.com.au/about-us/corporate-information/our-organisation/customer-commitment-and-service-charter>

⁴ Australia Post Community Polling Practices: Gauging Community Support for Changes to Postal Delivery Services

It does not appear to us that Australia Post has understood the import of the Report of 2009 and it is not giving any proper consideration to its community obligations when making its collection 'downsizing' decisions.

Yours faithfully

A handwritten signature in black ink, appearing to read "D.S. Levin", with a long, sweeping horizontal line underneath.

David Levin K.C.
Secretary

East Clifton Hill Residents Inc (No A0114110I)