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Authors

Anders Hildingsson, Joakim Levin, Emma Maraschin, Cecilia Nyqvist, Erika Nysäter (project manager), Anna Pettersson, Helene Rosang, Liana Thorkildsen (editor), Alexander Viksten.

Swedish Post and Telecom Authority

Box 6101 102 32 Stockholm

+46 (0)8-678 55 00

pts@pts.se

www.pts.se

Introduction

The Swedish Post and Telecom Authority is responsible for the monitoring, analysis and reporting on the development of the postal market. Our annual report – Swedish Postal Market – is an important part of this work. The report provides the reader with an overall picture of the postal market and PTS's work on regulation, follow-up and supervision in this area.

Since 2000, two out of three physical letters have been replaced by digital communication in Sweden and the development continues. In step with the digitalisation of society, the postal market is radically changing by users sending more parcels and fewer letters. Although we have already seen a very large decline in letter volumes, a continued dramatic decline is expected, as public stakeholders increasingly switch to digital communication. This development affects the conditions for postal operators to operate in the market. This development also raises the question of what requirements society should place on a universal postal service to ensure that the changing needs of users are met. In order to meet the changes, PTS considers that the transit time requirement should be reviewed. According to PTS, the choice is between maintaining a high level of service through today's delivery time requirements, which will soon entail large costs for the provision of the service. The alternative is to adapt the transit times and instead spend society's resources on developing new digital services and ensure that as many users as possible can use them.

Over the next few years, the regulatory framework will need to change, both in Sweden and in the EU. In 2025, PTS chairs the European Regulators Group for Postal Services (ERGP) and is working together with other supervisory authorities on a review of the EU Postal Services Directive, which largely forms the basis for the Swedish postal legislation. This and similar analyses form an important basis in such work for creating an international understanding of how the Swedish postal market works and how we in Sweden work to secure the users' needs for postal services in a market rapidly being digitised.

Dan Sjöblom Director General

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Abbreviations and terminology

Terms used in the report

Address location: a location that, according to Lantmäteriet's Land Registry, indicates a residential or business address; usually the entrance to the building containing the residence or business.

Transit time requirement: today's D+2 95 % means that 95 per cent of the domestic letters that have been handed in for delivery within two working days from time of deposit, and which were posted on time, must be delivered within two subsequent business days, irrespective of where in the country the letters were posted. In the report, we use different numbers after 'D+' where D refers to the day on which the letter was posted/handed in and the number indicates the number of subsequent working days within which a domestic letter must be delivered.

Letter: an addressed item enclosed in an envelope or other type of covering and weighing a maximum of 2 kg, as well as postcards, cards, and similar items.

Traditional letters: services up to 2 kg, intended for sending written messages. This is the definition PTS uses when collecting data from the postal operators.

Parcel letters: services up to 2 kg, intended for sending goods and objects handled and delivered within the mail flow.¹ This is the definition PTS uses when collecting data from the postal operators. It is a type of consignment.

Parcel delivery services: services that include the collection, sorting, transport, and delivery of parcels.

Parcel locker: a locker or a box where the recipient can receive goods consignments.

¹ In the Swedish Postal Services Act, there is no definition for letter mail items up to 2 kg containing goods delivered as part of regular mail delivery routes. In postal legislation, both types of items (i.e. parcel letters and traditional letters) constitute *letters* and the delivery of these constitutes postal activities subject to a permit. Market-wise, however, parcel letters compete with "ordinary parcels" (primarily B2C), which in many cases are within the weight range 0-2 kg and where only the manner of conveying the consignment to the recipient differs. The lack of a clearly defined term has created some difficulties in previous reports to refer to these items in a consistent and clear manner. For this reason, PTS has introduced the term *parcel letter*, which corresponds to the English term "packet". The introduction of the term also makes it easier to avoid using different operators' service designations such as Varubrev (light goods mail item), Postlådepaket (small parcel), and Brevlådepaket (mailbox parcel).

Postal device: letter box, mail slot (letter plate), mailbox in a property mailbox, or similar device for receiving postal items.

Postal service: collection, sorting, transport and delivery of postal items for payment. According to Chapter 1, Section 2 of the Postal Services Act (SFS 2010:1045).

Postal activities: regular collection, sorting, transport and delivery of letters for payment. According to Chapter 1, Section 2 of the Postal Services Act.

Universal postal service: According to Chapter 1, Section 2 of the Swedish Postal Services Act, universal postal service is a postal service that must be available throughout the country, of good quality and that enables all users to receive postal items and to deliver such items at reasonable prices for carriage.

Chapter 3, Section 1 of the Postal Services Act states that the universal postal service must meet the requirements that:

- at least one collection and at least one delivery of postal items shall be carried out every working day and at least five days a week, except in circumstances or geographical conditions deemed as grounds for exemption by the licensing authority;
- the dispatch and drop-off points shall be so close together as to consider users' needs;
- 3. compliance with the provisions on transit times announced by the Government or the authority designated by the Government;
- 4. it shall be possible to insure postal items and to obtain a receipt confirming that a postal item has been received;
- 5. single postal items shall be transported at uniform prices; and
- 6. the terms of service shall be publicly available.

Postnord is currently designated to provide parts of the universal postal service, such as postal services designed to transport items of correspondence weighing no more than 2 kg (traditional letters) as well as certain postal services designed to transport goods with or without commercial value weighing no more than 20 kg to certain vulnerable groups. PTS's decision on licence conditions for Postnord is valid from 1 April 2025 until 31 March 2027 (Postnord's licence conditions).²

 $^{^2}$ Ref.no. 24-13676. $\underline{\text{PTS's}}$ decision ensures the continuation of a universal postal service.

Abbreviations for organisations

ERGP: The European Regulators Group for Postal Services

PTS: Swedish Post and Telecom Authority

UPU: Universal Postal Union

Laws and directives

EU Postal Services Directive: Directive 97/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service, as amended by Directive 2002/39/EC of the European Parliament and of the Council of 10 June 2002 and Directive 2008/6/EC of the European Parliament and of the Council of 20 February 2008.

Swedish Postal Services Act (SFS 2010:1045)

Swedish Postal Services Ordinance (SFS 2010:1049)

The Swedish Post and Telecom Authority's regulations and general guidelines on the delivery of mail in the provision of a universal postal service, PTSFS 2022:20.

1. Licence conditions for Postnord

According to the Swedish Postal Services Act, there must be a universal postal service throughout the country, which is of good quality and enables all users to receive postal items and to deliver such items for carriage at reasonable prices. Furthermore, according to the Swedish Postal Services Act, PTS may make the authorisation to conduct postal activities subject to the condition of providing all or part of the universal postal service. If all the requirements of the universal postal service under the Swedish Postal Services Act are met by market stakeholders competing on a commercial basis, there is no reason to designate a postal service company to provide all or part of the service.

In light of this, PTS has decided on new licence conditions for Postnord, which will extend from 1 April 2025 to 31 March 2027.³ The decision requires Postnord to provide parts of the universal postal service such as postal services designed to transport items of correspondence weighing no more than 2 kg (traditional letters). Postnord shall also provide certain postal services designed to transport goods with or without commercial value weighing no more than 20 kg (parcels) to certain vulnerable groups. This is a service that does not require internet access, a supplementary postal service in areas with long distances to dispatch and access points, and a special postal service for the elderly and persons with disabilities and postage-free delivery of Braille items.

PTS's decision differs from previous licence conditions for Postnord, where the operator was appointed to provide the entire universal postal service throughout the country. The reason for the change is that PTS has been able to establish that the Swedish parcel market is now characterised by healthy competition across the country. At the same time, the Authority's assessment is that there are vulnerable groups who have special needs for certain postal services for items weighing up to 20 kg, which is why Postnord continues to be appointed to provide these. Through the licence conditions, PTS ensures that there is a nationwide postal service of good quality that meets the needs of the community in those parts where the postal market does not cater to them.

According to the licence conditions, Postnord shall carry out collection and delivery every business day Monday to Friday, as well as carry out independent

³ Ref.no. 24-13676. PTS's decision ensures the continuation of a universal postal service.

measurements of transit times. The licence conditions also contain obligations to disclose prices and conditions, among other things, and to make public the number of complaints.

In December 2024, Postnord appealed the decision on licence conditions, citing, inter alia, that the decision is disproportionately burdensome and that the operator should be compensated for the provision of the parts of the universal service for which Postnord is designated. The company Early Bird AB has also appealed the decision, citing, among other things, the impact of the decision on the competitive situation in the postal market. Judicial proceedings regarding these companies' appeals are currently underway at the Administrative Court in Stockholm.⁴

⁴ In March 2025, the Administrative Court in Stockholm rejected the Fria Postoperatörers Förbund's appeal on the grounds that they do not have the right to litigate and are not parties to the case.

2. Market and pricing

2.1 The Swedish letter market

By instruction of the Authority, PTS has the task of continuously monitoring developments in the postal market, ensuring that postal services meet the needs of society, promoting effective competition and monitoring price developments. PTS presents its market analyses of the letter market in this section. For market analyses of the parcel market, please refer to PTS's report *Den svenska paketmarknaden* [The Swedish Parcel Market], which will be published in September.

2.1.1 Sub-markets and sub-segments of the letter market

The letter market consists of two main sub-markets: items of correspondence (traditional letters) and consignments of goods (parcel letters) and refers to items delivered in the mail delivery network, i.e. delivered by letter carrier, newspaper delivery, or promotional distribution.

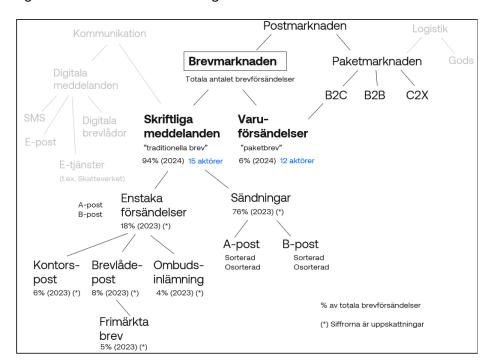


Figure1: Sub-markets and sub-segments of the letter market

Digitalisation has in recent decades led to a sharp reduction in the number of transported items of correspondence. Despite this, around one billion letter mail items were still distributed in 2024, of which the vast majority (94%) still consisted of items of correspondence. More detailed market analysis of these two main segments (items of correspondence and consignments of goods) can be found in sections 2.1.4-2.1.6 below.

Items of correspondence, in turn, can be divided into two main segments: bulk mail shipments and single piece letters.

2.1.1.1 Shipments (industrial bulk mail)

A shipment consists of a larger volume of letters submitted at one time. Shipments are usually produced industrially and computer-aided. To be classified as a shipment, the quantity of letters must reach a certain volume, usually at least 500 items per submission. If the volume is reached, the sender can receive a significantly lower price compared to the postage for single piece consignments. Shipments are divided into first class mail (*A-post*) and economy mail (*B-post*), where *A-post* refers to the normal postage with the fastest transit time while *B-post* means a longer transit time.

Shipments can be further divided into the categories unsorted and sorted. Unsorted shipments are significantly more expensive than sorted. In most cases, however,

shipments are produced in such a way where they have already been sorted at the time of submission to the postal operator, whereupon the sender receives an additional discount for this performance, a sorting discount. In these cases, the degree of sorting can vary from the items being submitted by order of postal code, to the items being sorted in the order in which the letters are to be delivered in each individual postman's route (so-called walking order sorting)

In the B-post market, Postnord and Citymail are the main competitors, but morning newspaper distributors have also experienced some volume growth in recent years. Access to the bulk mail market involves relatively large investments, as large volumes are required to achieve the economies of scale enjoyed by established stakeholders within a reasonable time.

Regarding A-post shipments, Postnord has a very strong market position as its larger competitors are mainly focused on B-post. There are competing offers for A-post shipments as well, but these relate to local distribution within restricted geographical areas.

2.1.1.2 Single piece letters

Single piece letters are letters that are posted one by one, or in a smaller quantity, in mailboxes, at postal service points, or the like. In practice, letters are classified as single piece letters if they do not reach the number of letters required for them to be classified as bulk mail. The majority of single piece letters are first class mail (*A-post*).

Single piece letters can further be divided into mailbox mail and office mail. Mailbox mail refers to letters that are posted in a mailbox and are sent as single piece consignments, such as stamped and meter stamped letters. Office mail includes letters from companies that are stamped in a postage meter or marked with the designation 'postage paid'.

In practice, Postnord is the only postal operator for the nationwide carriage of single piece letters. At the local level, the competition consists of a relatively small number of locally active postal operators with small volumes. In recent years, the morning newspaper distributors⁵ also compete in this segment.

With regard to nationwide office mail, Postnord also holds a strong position. For a few years now, the operator Mailworld Office has been active, whose business concept is to collect office mail and convert it to bulk mail shipments. These are then handed over to Postnord, Citymail or Early Bird for final delivery.

⁵ Early Bird AB distributes parcels with the morning newspaper. The company was formerly named 'Morgontidig distribution' (MTD) and changed its name to Early Bird some years ago. https://earlybird.se/om-early-bird/om-oss/

2.1.2 Definitions and data for market analysis

The Swedish Postal Services Act does not define items based on their content. However, PTS notes that letter items are generally used for two purposes: to send items of correspondence, and to send goods and objects, so-called consignments of goods. In recent years, the digitalisation of the market has led to these two segments developing in different directions, with falling volumes of items of correspondence and a growing number of goods consignments.

In order to be able to distinguish between these two conflicting trends, PTS has been collecting statistics on letter mail items (i.e. items delivered by letter carrier, newspaper delivery, or promotional distribution) since 2019 divided into two subsegments, which PTS calls:

- Traditional letters: services up to 2 kg, intended for sending written messages.
- Parcel letters: services up to 2 kg intended for sending goods and objects and that are handled and delivered within the mail flow

Regarding the parcel letters, it can be established that they fall within the Swedish Postal Services Act's definition of letters, but while they are distributed in the letter distribution network, they often compete with delivery services in the logistics network (i.e. parcel delivery services). The parcel letters can thus be seen as a hybrid service, which in practice is both a letter and a parcel.

According to the Swedish Postal Services Act, a licence is required for the regular delivery of letters for payment. In 2024, 196 companies were licensed to conduct postal activities. Of these, two8 operators had no delivery of their own and were therefore not covered by the data collection. This means that the analysis in this chapter is based on data from 17 individually registered companies, of which 15 are active in the traditional letters market and 12 are active in the parcel letter market.

2.1.3 Metrics for market analysis

In this chapter, two metrics are used for market analysis:

⁶ In 2024, postal permits have been revoked for Bring Mail Nordic AB, Kiruna Mail AB, Hall Media Logistik AB, Prolog KB and Tidningstjänst AB. Nim Distribution i Skåne AB has changed its name to Bonway AB, which is the result of a merger between Bonway AB, Hall Media Logistik AB, Prolog KB and Tidningstjänst AB

⁷ Operators licensed to operate postal activities <u>List of current postal operators.</u>

⁸ MailWorld Office AB and Mediakonsult i Göteborg AB.

Market shares: Market shares are usually calculated based on value (e.g. turnover), which is considered a good measure of a company's overall ability to overcome market barriers and offer products that are attractive to consumers. The exception is when the market is very homogeneous, where market shares based on volume can give a more accurate picture. The reason is that a company in a homogeneous market offering a cheaper product can have a relatively large impact on competition (and take a large share of the volumes) without necessarily having high revenues.⁹ To give a complete picture of the market, PTS presents market shares both in terms of volume and turnover.

 Herfindahl-Hirschmann Index (HHI): a measure of market concentration, calculated as the sum of squared market shares. An HHI value below 15% means low market concentration, a value between 15 and 25% means moderate market concentration, and a value above 25% means a high market concentration.¹⁰

2.1.4 Changing communication patterns lead to continuously falling letter volumes

The digitalisation of society has led to major changes in users' consumption habits, with an increasing degree of substitution from written to digital communication. Since the end of the 1990s, the total number of letter mail items has decreased by 70% (72% if parcel letters are excluded). The average annual volume decline has increased from about 2% per year in the 2000s, to about 6% per year in the 2010s and about 10% per year in the 2020s.

⁹ Busu (2012), An economic analysis of the degree of market concentration: ⁹ Competition indicators; Department of Justice & FTC (2010), Horizontal Merger Guidelines.

¹⁰ Competition indicators; Department of Justice & FTC (2010), Horizontal Merger Guidelines.

Utveckling av totala brevförsändelser 1997-2024 (inklusive paketbrev, 0-2 kg, tusental) 4 000 000 3 500 000 1997-2024: -70% 3 000 000 2 500 000 2 000 000 Genomsnittlig årlig nedgång: 1 500 000 2000-2010 -1,7% 1 000 000 2010-2020 -5,8% 2020-2024 -9,9% 500 000

Figure 2: Development of total letter volumes (thousands) 1997-2024

2.1.5 Volumes and turnover in the letter market 2024

In 2024, about 1.05 billion letter mail items were distributed within the Swedish letter market, of which 983 million items (94%) were traditional letters and 66 million were parcel letters. Total sales in the market amounted to SEK 8.1 billion, of which traditional letters accounted for SEK 6.1 billion and parcel letters for SEK 1.9 billion.

Table 1: Volumes and turnover in the letter market 2024

	Utfall	2024	Tillväxt 2023-2024		
Postmarknaden 2024	Volymer (mnst)	Omsättning (mdkr)	Volymer	Omsättning	
Traditionella brev 0-2 kg	983	6,1	-13%	-4%	
Paketbrev 0-2 kg	66	1,9	5%	9%	
Totala brevförsändelser	1 049	8,1	-12%	-1%	

Traditionella brev: tjänster upp till 2 kg, avsedda för att skicka skriftliga meddelanden Paketbrev: tjänster upp till 2 kg, avsedda för att skicka varor och föremål

Compared to the previous year, the total number of letter mail items has decreased both in terms of volume (-12%) and turnover (-1%). The totals hide the fact that while traditional letters have declined (-13% in terms of volume and -4% in terms of turnover), parcel letters have increased both in terms of volume (+5%) and turnover (+9%).

2.1.6 Postnord maintains a strong position in the letter market

2.1.6.1 Market shares and market concentration (traditional letters)

Postnord has held a strong position in the letter market ever since the liberalisation of the market in the early 1990s. In recent years, however, the stakeholder has relatively continuously lost market shares to the benefit of the smaller stakeholders in the market.

Postnord remains the largest stakeholder in the traditional letter market, with a market share of 70-75% (in terms of volumes) in 2024. Postnord's biggest competitor is Citymail, which had a market share of 25-30% during the year. This is followed by the distributors working together as part of Early Bird, which together had a market share of 1-5%. After that, there are eight local stakeholders that both individually and collectively have a market share of less than 1%.

Table 2: Market shares and market concentration for traditional letters 2024

Postoperatör	Marknadsandel (volym) Traditionella brev (0-2 kg)		
Postnord	70-75%	-1	
Citymail	25-30%	2	
Early Bird (5st)	1-5%	0	
Lokala aktörer (8st)	<1%	0	
нні	60% +	(61%)	

Postoperatör	Marknadsandel (omsättning) Traditionella brev (0-2 kg)			
Postnord	85-90%	-1		
Citymail	10-15%	1		
Early Bird (5st)	1-5%	0		
Lokala aktörer (8st)	<1%	0		
ННІ	75% ↓	(76%)		

Marknadsandelar: röd markering = minskning; grön markering = ökning.

Early Bird-distributörer som distribuerar brev: NWT, Point, SVHL HB, SVHL Norr, VTD. Inkluderar lokala volymer.

Lokala aktörer: BJ Distribution, Georgsson Mail, Lysekil, MailCompany Sweden, Mariestads, Postmästaren, SDR, Sundsvall citypost

Compared to last year, Postnord has lost one percentage point (in terms of volume), while Citymail has strengthened its position by two percentage points. The market share of other stakeholders remains more or less unchanged with a change of less than one percentage point.

A calculation of the Herfindahl-Hirschmann Index (HHI) gives a value of 60% (in terms of volume), which implies a high degree of market concentration. However, the concentration has decreased by one percentage point during the year. PTS notes that the market for traditional letters is still a very highly concentrated market. This is particularly true for certain sub-segments, such as nationwide letters, where Postnord is basically the only stakeholder.

When calculating the market shares based on turnover, we get a similar picture, but we can see that Postnord's market share is higher (85-90%) and so is the market concentration (75%). Both measures of concentration have also decreased during the year in terms of turnover.

2.1.6.2 Market shares and market concentration (parcel letters)

Postnord is also the largest stakeholder in the parcel letter market and had a market share of 55-60% (in terms of volume) in 2024. This is followed by the seven stakeholders working together as part of Early Bird, with a combined market share of 30-35%, followed by Citymail with a market share of 5-10%. In addition, there are a small number of small, local stakeholders, which both individually and together have a market share of less than 1%.

Table 3: Market shares and market concentration for parcel letters 2024

Postoperatör	Marknadsandel (volym) Paketbrev (0-2 kg)		
Postnord	55-60%	-5	
Early Bird (7st)	30-35%	5	
Citymail	5-10%	0	
Lokala aktörer (3st)	<1%	0	

Postoperatör	Marknadsandel (omsättnin Paketbrev (0-2 kg)		
Postnord	65-70%	-5	
Early Bird (7st)	25-30%	5	
Citymail	5-10%	0	
Lokala aktörer (3st)	<1%	0	
нні	52% 🔸	(57%)	

Marknadsandelar: röd markering = minskning; grön markering = ökning. Early Bird: Bonway, NWT, Point, Premo, SVHL HB, SVHL Norr, VTD. Inkluderar lokala volymer. Lokala aktörer: BJ Distribution, Mariestads brev- och paketservice, Postmästaren i Hälsingland

Compared to the previous year, Early Bird in particular has strengthened its position (+5 percentage points) (in terms of volume), while Postnord in particular has lost market share (-5 percentage points). The market share of other stakeholders remains relatively unchanged with a change of less than one percentage point.

A calculation of the Herfindahl-Hirschman Index (HHI) gives a value of 46%, which implies a high level of market concentration, which, however, has decreased by three percentage points during the year.

If the analysis is instead carried out on market shares calculated on turnover, we get a similar picture, but it can be concluded that both Postnord's market share and market concentration are greater in terms of turnover. However, both measures have decreased over the previous year.

2.1.6.3 Market shares and market concentration (evolution over time)

Since 2019, PTS has been able to distinguish parcel letters from the total letter volumes, which makes it possible to analyse the development of the measures of concentration over time separately for the two sub-segments, traditional letters and parcel letters.

Table 4: Market shares and market concentration over time for traditional letters and parcel letters respectively (2019-2024)

Traditionella brev (baserat på volym)

	2019	2020	2021	2022	2023	2024	2019-2023
HHI	66%	66%	64%	62%	61%	60%	-6
CR1	75-80%	75-80%	75-80%	75-80%	70-75%	70-75%	-6

Paketbrev (baserat på volym)

	2019	2020	2021	2022	2023	2024	2019-2023
нні	74%	66%	55%	52%	49%	46%	-28
CR1	80-85%	75-80%	65-70%	65-70%	60-65%	55-60%	-27

HHI = marknadskoncentration; CR1 = marknadsandelen hos det största företaget (Postnord) As the table above shows, both market concentration (HHI) and the market share of the largest company (Postnord, CR1) have decreased over time. However, the development has been more cautious in the market for traditional letters (where HHI and CR1 have each decreased by about 6 percentage points since 2019), compared to the development in the market for parcel letters, where HHI has decreased by 28 percentage points, and CR1 by 27 percentage points, since 2019.

2.1.6.4 <u>Concluding remarks</u>

In this section, PTS has examined the competitive situation in the letter market, divided into traditional letters and parcel letters. Postnord is still the largest stakeholder in both sub-markets, but has lost market shares in both markets during the year, and in particular in the parcel letter market. Similarly, market concentration has decreased in both sub-markets. There, too, the decrease has been slightly higher in the parcel letter market. In summary, PTS can conclude that, despite this positive development, there is still a relatively high degree of market concentration in both sub-markets, and in particular in the market for traditional letters.

2.2 The letter market at regional and local level

In PTS's annual data collection from licenced postal operators, volume data is collected both at national level and as volumes by postal code. This information allows for a much more thorough analysis of the state of competition in different parts of the country. In preparation for this year's edition of *Swedish Postal Market*, PTS has conducted an in-depth analysis of the regional and local competitive

landscape in the market for items of correspondence (i.e. traditional letters).¹¹ The analysis presents reported data in four different categories of stakeholders: Postnord and Citymail, and the morning newspaper distributors cooperating as part of Early Bird (5), as well as other local postal operators (8).

2.2.1 Geographical and administrative postal codes

Postal codes can be divided into two main categories. On the one hand, postal codes linked to location addresses (geographical postal codes) and, on the other hand, so-called administrative postal codes that do not have a given geographical distribution but are instead linked to large postal recipients, P.O. Box addresses, post box facilities or other types of postal facilities. Generally speaking, individuals and small businesses are postal recipients when delivering to geographic postal codes, while recipients in cases of delivery to administrative postcodes are mainly larger companies and organisations. In total, there are just over 16,000 active postal codes, of which about 11,000 are geographical while the remaining 5,000 are administrative.

Table 5: Distribution of geographical and administrative postal codes within each respective category of postal operators

Typ av postnummer	Postnord	Citymail	Early Bird	Övriga postoperatörer
Geografiska	68%	70%	81%	69%
Administrativa	32%	30%	19%	31%
Totalt	100%	100%	100%	100%

As can be seen from the table, the distribution of approximately 70/30 (geographical/administrative) of delivered letter volumes (traditional letters) is relatively general regardless of which stakeholder delivered the letters, although the morning newspaper distributors (Early Bird) delivers to geographical postal codes to a slightly greater extent.

2.2.2 Geographical distribution of letter volumes in the country

Appendices 1-5 contain map images and supplementary statistics illustrating the geographical distribution of letter volumes (traditional letters) in greater detail.

¹¹ The corresponding analysis for parcel letters/consignments of goods will be carried out for the upcoming edition of the report *Swedish Parcel Market*, as parcel letters primarily compete in the parcel market as one of several different delivery channels for parcel post items.

However, the differences between different stakeholders are distinct when comparing market shares in metropolitan regions¹² with the rest of the country.

Table 6: Market shares for traditional letters reported in volume ranges broken down by metropolitan regions and the rest of the country

Region	Postnord	Citymail	Early Bird	Övriga
Stockholm	50-55%	45-50%	<0.02%	<0.003%
Göteborg	55-60%	40-45%	<2%	<0,01%
Malmö	60-65%	30-35%	<2%	0%
Övriga landet	85-90%	5-10%	<2%	<0,6%

It is clear that competition in the traditional letter market is mainly concentrated in the metropolitan regions (and surrounding areas), while Postnord is essentially the sole stakeholder for the bulk of the letter volumes delivered to the rest of the country. This picture becomes even clearer if you look at the other market coverage metrics:

- Share of postal codes: share of the total number of postal code areas in which each stakeholder has carried out delivery service operations during 2024.
- Share of drop-off points: the share of all drop-off points that have been included in the delivery areas in which each stakeholder has carried out delivery service operations during 2024.¹³ However, it does not say whether the stakeholder has delivered letters to all drop-off points within the delivery area.
- Share of postal code areas: share of the total postal code area of the country in which each stakeholder has carried out delivery service operations in 2024. ¹⁴ This measure complements the information on the share of the total number of postal code areas as the distribution of postal code areas can look very different. In more densely populated areas they are usually small while they can have an extensive distribution in sparsely populated areas and archipelagos.

¹² The starting point for this breakdown is the model (geographical breakdown) used to distribute forwarding revenue from Svensk Adressändring to different stakeholders.

¹³ The term 'drop-off point' refers to mail slots in doors, compartments in multi-occupancy mailboxes, mailboxes or equivalent facilities for receiving letters and other postal items. There are approximately 5.7 million active drop-off points in total in Sweden.

¹⁴ Some measures of area in different geographical divisions use land area as a concept, but this measure is somewhat misleading to use for letter delivery, as reaching recipients on islands or in vast sparsely populated areas is a particular challenge. It will thus be most accurate to see the postal code areas as a whole.

Table 7: Geographical coverage in relation to market share

Postoperatör	Andel av totala volymer ¹⁵	Andel av administrativa postnummer	Andel av geografiska postnummer	Andel av avlämnings- ställen	Andel av yta
Postnord	70-75%	98%	100%	100%	100%
Citymail	25-29%	43%	48%	53%	10%
Early Bird	1-5%	75%	37%	82%	41%
Övriga	<1%	2%	2%	2%	1%

The table shows that Postnord, with a market share of about 70-75%, covers all geographical postal code areas and drop-off points in the country. This can be compared with Citymail with a market share of about 25-29%, covering just over half of all geographical postal codes and drop-off points in the country, but only about 10% of the total area.

Early Bird reaches a significantly greater percentage of the national postal recipients through the delivery of morning newspapers and parcel letters, but achieves only just over 40% area coverage when it comes to delivery of traditional letters. Other smaller postal operators have such localised activities that they have only a marginal effect on the competitive landscape in the country as a whole from a geographical perspective (as can also be seen in the map image in Appendix 4).

The conclusion is that the competition in the traditional letter market is highly concentrated geographically and that it is essentially only Postnord, as the designated provider of parts of the universal postal service, that carries out the delivery of traditional letters throughout the country.

2.3 Continued compliance with the Postal Services Ordinance's price increase ceiling

The appointed provider of universal postal services must take into account the rules on pricing set out in the Postal Services Ordinance and the Postal Services Act when making price adjustments.

The price increase ceiling, pursuant to Section 9 of the Swedish Postal Services Ordinance, means that the provider of a universal postal service (i.e. Postnord) must not, per calendar year, raise prices for the carriage of stamped letters by more than the permitted price increase margin calculated based on the same provision of the Swedish Postal Services Ordinance. The price increase ceiling is designed to allow the operator to recover costs and provides a margin for price increases based on

¹⁵ See the table Market shares and market concentration for traditional letters 2024.

inflation trends as well as the increased unit costs caused by the decline in letter volumes.

On 1 January 2024, Postnord increased postage by SEK 3 (from SEK 15 to 18), which is an increase of 20%. This is within the permitted price increase margin, as the total margin for 2024 considering inflation and volume reduction was 50% according to the Swedish Postal Services Ordinance's rule.

On 1 January 2025, Postnord increased postage by SEK 4 (from SEK 18 to SEK 22), which corresponds to an increase of 22%. Although the volume development for stamped letters in 2024 has not yet been determined, PTS can already note that given that there is an unused price increase margin from the previous year of about SEK 4, the increase is within the permitted range.

3. Service & Quality

3.1 Users' enquiries, comments and complaints about the postal services

Users of postal services contact both PTS and postal operators with enquiries, comments and complaints about various aspects of the postal services. Postal operators are required by the Swedish Postal Services Act to have a procedure in place to deal with user complaints.

The following is an account of the enquiries, comments and complaints received by PTS, as well as Postnord and Citymail in 2024.

3.1.1 Reduction in the number of enquiries to PTS 2024

User comments submitted to PTS provide the Authority with important information about how the postal market is functioning and how well postal services are meeting users' needs and expectations. Enquiries received are divided into the case types complaints, comments, and other. In 2024, 62% of enquiries received were recorded as complaints, compared to 80% in 2023.

In 2024, the Authority received a total of 963 enquiries, compared to 1,687 enquiries in 2023. That represents a 43% decrease compared to the previous year. The decrease in the number of complaints to PTS may be due to the fact that, in 2024, the Authority has worked to guide users of postal services who wish to file complaints about postal activities on the Authority's website, to do so primarily with the relevant postal operator. At the same time, Postnord has improved and simplified its case management process for receiving complaints (see section 3.1.2). PTS will continue to monitor whether the reduced inflow of enquiries to the Authority may also have some other explanation.

The vast majority of all enquiries received by PTS are delivery-related and mainly concern items being delivered too late, to the wrong recipient, lost or damaged. In 2024, 514 enquiries were delivery-related and the same figure for 2023 was 813. The distribution of enquiries between different postal operators looks similar to the previous year: about 80% could be linked to Postnord, 3% to Citymail and 17% to an unspecified or unknown postal operator.

3.1.2 Complaints and comments to Postnord: increasing number of letter complaints in 2024

Postnord distinguishes between *complaints* and *customer comments* in its reporting of the number of cases submitted by postal users. *Complaints* refer to complaints about specific services that are part of Postnord's product range for which customers can request compensation if Postnord has not fulfilled its obligation in accordance with the terms and conditions for the service. Under the category of *customer comments*, Postnord collects both complaints and suggestions for improvement.

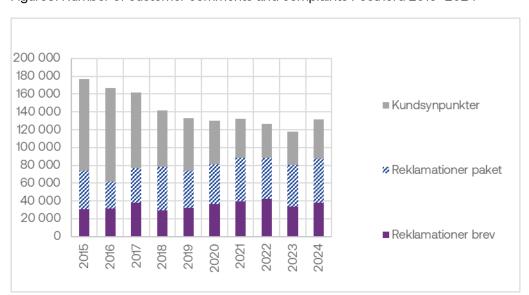


Figure 3: Number of customer comments and complaints Postnord 2015–2024

As shown in the figure above, Postnord registered a total of almost 131,292 complaints and customer comments in 2024.

Postnord has reported that the number of *customer comments* has increased by 18% compared to 2023. In 2024, Postnord received 44,017 customer comments on the distribution of letters and parcels and states that the increase is partly due to the operator's improvement and simplification of its case management process, through which customer comments are processed. Postnord reports that a large proportion of customer comments, 21,835, were about the delivery and collection of letters and parcels, such as wrongly delivered items or missing letters and parcels.

In 2024, the total number of *complaints was* 87,275, of which 37,605 related to letters and the remaining 49,670 related to parcels. The most common reason for a complaint was an item missing.

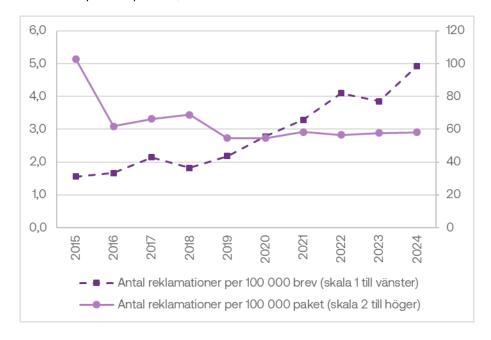
The number of complaint cases in which compensation has been paid has increased by 10%, from 14,050 cases to 15,400 cases in 2024, of which 13,442 relate to parcel matters. Postnord's reporting shows that in 2024, the operator paid compensation in more cases where complaints were filed regarding the *international letter* service. The number of such cases amounted to 1,307 in 2024, compared with 2023 when the operator provided compensation in 244 cases.

Compensation for the *international parcel* service has also increased, albeit to a lesser extent than for *international letters*. Postnord has compensated customers for the *international parcel* service in 2,806 cases in 2024, compared with 1,951 cases in 2023.

For the *international letters and parcels* services, Postnord's report shows a slight decrease in the number of cases where compensation has been paid. The average processing time for *international letters* cases has doubled to 17.8 days in 2024.

The number of complaints per 100,000 letters has increased by 1.7 to a total of 4.93 letters per 100,000 letters in 2024.





3.1.3 Fewer complaints and comments to Citymail in 2024

Citymail distinguishes between complaint cases and information cases, where complaints are primarily about missing or wrongly delivered mail, which also includes

parcels. Information cases include, for example, cases regarding access codes or change of mailbox location.

For the first time since 2021, Citymail has reported a decrease in the number of complaints by 10% in 2024 compared to 2023. In 2024, Citymail reported 15,881 complaint cases, compared to 17,587 complaints in 2023. Citymail's parcel volumes (0—2 kg) continue to increase, but not at the same rate as before. Most of the complaints relate to missing parcels.

3.2 Surveys on users' needs for postal services: Consequences of a modified transit time requirement

PTS regularly conducts surveys of users' needs for postal services. The surveys show that users are very much embracing the new ways of communicating offered by digitalisation and that needs and behaviours are gradually changing. An example of this is that a majority of users state that they would not be affected if the transit time were to increase by one day. In addition, most Swedes have a digital mailbox and almost everyone has access to the internet. According to PTS surveys, the focus should be on ensuring stable and reliable, albeit somewhat slower, postal service for those letters that cannot be digitised. The postal market in Sweden is facing a significant change as a result of society's rapid digitalisation. Users' need for letters is decreasing, while they are receiving and sending more and more parcels. Since 2000, two out of three physical letters have been replaced by digital communication in Sweden.

In February 2025, PTS published a study on how critical societal stakeholders would be affected by a modified transit time requirement. Although we have already seen a very large decline in letter volumes, a continued sharp decline is expected as both public and private stakeholders increasingly shift to communicating with their recipients via digital messages. Calculations show that Postnord's letter volumes will continue to drop and could be equivalent to about a third of today's in five years' time. This development is increasingly affecting the conditions for postal operators to operate in the market. This also raises the question of what requirements society should place on a universal postal service to ensure that the users' changing needs for postal services are met. In order to meet the changes for both the recipients and the provider of the universal postal service, PTS is of the opinion that the transit time

¹⁶ PTS survey <u>Use of postal services by the population 2023</u>.

¹⁷ Digital myndighetspost Utredningen om digital post [Digital Government Agency Post - Inquiry on Digital Post] (SOU 2024:47).

¹⁸ Consequences of a modified transit time requirement PTS-ER- 2024:29 (ref.no. 24-10096).

requirement should be reviewed. (See also Section 3.3 on the transit time requirement).

The survey shows there are alternative postal services that can deliver letters quickly throughout Sweden, but these services are on average more expensive than Postnord's standard postage rate. Government agencies, regions and municipalities would in some cases have to rely on express services to ensure that time-critical consignments arrive on time, which may result in increased costs. The combination of digital solutions and changed procedures are seen as main strategies to reduce reliance on more expensive alternatives.

Several stakeholders in the survey note that, in the long term, extended transit time can lead to more efficient, more sustainable solutions that better adapt mail handling to the digitalised society. It can also drive a transition to digital communication channels and reduce the environmental impact of physical mail. The survey highlights the adaptations that may be needed to deal with an extended transit time. Digitalisation is an important solution, but continued efforts are needed to achieve digital inclusion for the groups most dependent on physical mail.

In order for different stakeholders to adapt their respective activities and regulatory frameworks in good time to longer regulated transit times, the conditions for the future universal postal service need to be established shortly. According to PTS, the choice is between maintaining a high level of service through today's delivery time requirements, which will soon entail large costs for the provision of the service. The alternative is to extend the transit times and instead spend society's resources on developing new digital services and enabling as many users as possible to use them.

The study describes areas where there is a need for a reliable letter service in the future. Respondents highlight the need for a robust infrastructure with a functioning postal service even in case of crisis or heightened preparedness, which may need to be investigated further. In the Total Defence Bill, the Government also points out that it should be identified how the Total Defence's needs of postal services are affected in case of heightened preparedness and that lessons learned from Russia's invasion of Ukraine should be utilised as part of such work. In 2024, PTS initiated a dialogue with the Swedish Defence Research Agency (FOI), and in February 2025, PTS issued a mandate to FOI aimed at analysing the needs of the Total Defence. The project will run through 2025 and conclude with a report in early 2026.

If the decision on longer transit time is taken relatively soon, the provider can begin systematic adjustments of the capacity and infrastructure of the letter flows, as well

¹⁹ The Total Defence Bill 2024/25:34, p. 130.

²⁰ PTS ref.no. 24-15785.

as to integrate them to a greater extent in the logistics flows. It creates the conditions for a self-funded universal postal service even after 2029.

3.3 Postnord's compliance with the transit time requirement in 2024

An important part of quality monitoring in the postal market is the measurement of the percentage of single domestic letters that are delivered on time in accordance with the provisions set out in Section 6 of the Swedish Postal Services Ordinance. The regulations stipulate that a minimum of 95% of the domestic letters that have been handed in for delivery within two days after posting, and which were posted on time, must be delivered within two subsequent business days, irrespective of where in the country the letters were posted.

In the previous years 2022 and 2023, Postnord did not achieve the transit time requirement. In 2023, only 93.1% was achieved in the measurement. In 2024, Postnord reported to PTS that the operator has taken quality-enhancing measures that have had an effect in the second half of the year. For the full year 2024, the measurement result improved by 94.9%, which is just below the limit. However, it should be borne in mind that the statistical measurements (designed according to European standards) imply a certain statistical margin of error. The actual result is highly likely to be in the range of 94.7-95.1%, and the 95% requirement is thus within the range achieved.

3.4 Supervision in the postal market

During the year, PTS supervised Postnord's attempts to change the delivery model for the operator's services Varubrev and parcels delivered to the homes of private individuals and to business addresses. The experiment was carried out over a certain period and in certain specified non-urban areas (ref.no. 24-2373). Depending on the outcome of the trial, the changes would then potentially be implemented in more areas. The purpose of the supervision was to investigate whether the changes in the delivery model could be considered compatible with postal legislation and licence conditions for five-day delivery. Another general aim was to increase the knowledge within the Authority about delivery outside urban areas.

The investigation showed that even after the changes in the delivery model were implemented, Postnord would offer delivery of certain letter and parcel services such as express services or daily delivery to service points, in accordance with the

²¹ Chapter 3, Section 1 of the Swedish Postal Services Act, Clause 1.2 in Postnord's licence conditions (ref.no. 21—1568).

applicable legislation on five-day delivery. The supervision was thus terminated without further action.²²

During the year, PTS has also supervised Postnord's collection and delivery service operations in a sparsely populated area in northern Sweden (the area around Akkajaur). ²³ The area is very sparsely populated which is a challenge for postal delivery. The purpose of the supervision was to investigate whether the company's collection and delivery in the area complied with the collection and delivery requirements contained in postal legislation and licence conditions.²⁴

The supervision was initiated due to indications that delivery in the area was not performing in accordance with the expectations of the recipients. The supervision was terminated following reports that collection and delivery had improved since Postnord introduced delivery every other weekday in the area in autumn 2024. ²⁵

3.5 Households without five-day delivery

According to Chapter 3, Section 1 (1) of the Swedish Postal Services Act, a basic requirement of the universal postal service is that at least one collection and at least one delivery of postal items shall be carried out every working day and at least five days a week, except in circumstances or geographical conditions deemed as grounds for exemption by the licensing authority. According to Postnord's licence conditions, the operator can make exceptions when it comes to areas that are particularly sparsely populated, do not have a road that is navigable all year round, or islands without a fixed land link and that do not have regular ferry traffic during one or more of the week's regular working days.²⁶

PTS may also, at the request of Postnord, in certain cases decide on exemptions in circumstances other than those specified in Postnord's licence conditions.²⁷ Decisions on such exemptions may arise, inter alia, if unreasonably high costs would be incurred due to a regular collection and delivery frequency or if users' needs for postal services no longer correspond to the requirement for normal collection and delivery frequency due to changed communication patterns.²⁸

²² Supervision of changes in Postnord's delivery model, where certain letter and parcel services outside urban areas are delivered every other working day instead of every working day, ref.no. 24-2373.

²³ Ref.no. 24-12359

²⁴ Chapter 3, Section 1 of the Swedish Postal Services Act (SFS 2010:1045), Clause 1.2 in Postnord's licence conditions (ref.no. 21—1568).

²⁵ Postnord's delivery model meets demands in sparsely populated areas.

 $^{^{\}rm 26}$ Postnord's licence conditions, condition 1.2, second paragraph.

²⁷ Postnord's licence conditions, condition 1.2, third paragraph.

 $^{^{\}rm 28}$ Postnord's licence conditions, reasons for Condition 1.2.

In the 1990s, 1,600 households lacked access to five-day delivery. The figure has been steadily declining since then. In 2024, the exceptions from five-day delivery decreased by 495 compared to the previous year, from 1,332 to 837 at the end of the year.

Postnord has reported that they have made a change in the accounting of the number of households deemed to constitute exceptions in certain areas, due to the operator's change in the delivery of certain parcel services (see section 3.4). Postnord states that they have chosen to initially return to alternate day delivery of most services in connection with the implementation in certain localities. The reason is to ensure quality in the implementation of the new delivery model.²⁹

3.6 Inclusive postal services

On the basis of the UN Convention on the Rights of Persons with Disabilities (CRPD), the goal is to achieve equality in living conditions and full participation for people with disabilities in a diverse society. The goal shall contribute to increased gender equality and to the children's rights perspective being taken into account.³⁰

In particular, the Authority shall endeavour to achieve the objectives of the disability policy within its area of responsibility and shall act as a coordinating, supporting and driving force in relation to other stakeholders. ³¹

PTS's task is to ensure that services in the areas of electronic communication and post are available to persons with disabilities. This task is ensured through procurement and management of inclusive postal services, such as special postal service in sparsely populated areas and postage-free delivery of Braille items.

Special postal service is aimed at postal recipients who are unable to pick up their postal items due to advanced age or disability. The number of recipients of special postal services in sparsely populated areas has increased slightly in recent years. The increase is likely due to an increase in the proportion of older people in the population, combined with the targeted information efforts to the target group carried out in 2022–2023.³²

²⁹ Ref.no. 24-10097.

³⁰ <u>Nationellt mål och inriktning för funktionshinderspolitiken - Regeringen.se</u> [National objective and direction for disability policy]

³¹ Section 11, second paragraph of the Ordinance with Instructions for the Swedish Post and Telecom Authority (SFS 2007:951).

³² Evaluation of Postal Service for the elderly and disabled people living in rural areas (PTS-ER-2022:5).

The number of Braille items sent using the Postage-free delivery of Braille items service is decreasing. From 2022 to 2024, the number has decreased by 22.4%. The decrease is mainly due to the development and offering of corresponding digital services, for example through libraries.³³

Within the framework of the objective, PTS has also collaborated with parcel delivery service providers and other organisations, such as the Swedish Association of the Visually Impaired (SRF). The purpose has been to make parcel lockers more accessible to affected target groups.

During the year, PTS started a new procurement for the inclusive postal service Postage-free delivery of Braille items. The target group of the service is people who are blind, visually impaired, as well as people with other reading disabilities that make them unable to read printed material. The service allows the target group to send Braille items (such as audio books, accessible newspapers and Braille materials) free of charge. Libraries and organisations approved by PTS are entitled to send Braille items up to 7 kg free of charge to their target-group patrons.

PTS has also extended the contract and started a new procurement for a special postal service for people outside urban areas who, due to advanced age or a permanent disability, cannot collect their mail at a regular delivery point, such as a box collection point. The service delivers mail to the boundary of the property or, in exceptional cases, to the dwelling house, if everyone in the household meets the criteria. New contracts for the services were subsequently signed in spring 2025.

As part of the national objective of achieving equality of living conditions and full participation of persons with disabilities, PTS shall ensure that, inter alia, postal services are available to persons with disabilities. The planned activities such as procurement and management of the inclusive postal services have been implemented and yielded results. PTS's task towards the objectives is deemed to be completed for the year. This also applies in relation to the national need for inclusive postal services, where the Authority's efforts are deemed to yield a positive result for the needs of the target group.

3.7 Undeliverable letters

The work of processing undeliverable letters includes letters that cannot be delivered to either the recipient or the sender. The letters are opened and investigated, and sent, archived or destroyed, depending on the outcome of the investigation. PTS also

³³ PTS <u>Annual Report 2024, p. 25</u>.

supervises that the operators who have processed these letters maintain the privacy of the users.

The number of undeliverable letters decreased by 17% in 2024 compared to the previous year, which follows the national trend of decreasing letter volumes. The most common reason for letters becoming undeliverable is incorrect addresses and missing information about the sender.

A "Second Chance" awareness campaign was carried out via social media in the last months of the year. It aimed to reduce the number of undeliverable letters and ensure that more items find their way back to their senders if the recipient cannot be reached. The effect of the campaign can be assumed to have contributed to the decrease (17%) in 2024.³⁴

3.8 Service network for mail and parcel services

The Swedish Postal Services Act requires that the dispatch and drop-off points of the universal postal service be located in such close proximity that the needs of users are taken into account.³⁵ For users, both accessibility and quality of service are important.

Both Postnord's mailboxes and service networks³⁶ provide an important service for users in terms of collecting different types of postal items. Service points play a central role in the delivery of parcels, as well as some letter mail items that require a receipt.

Postnord has reviewed the number and placement of their mailboxes for the collection of letters in 2024. This has resulted in a decrease in the number of mailboxes by about 14% and they amounted to about 17,700³⁷ in January 2025 (compared to about 20,600 at the corresponding time in 2024). In contrast, collection times for the remaining mailboxes have not changed, with some occasional exceptions in different directions.

³⁴ During the year, items that lacked an address and information about the sender increased. This applies to larger consignments where address labels come off during transport. Information efforts on the website and in contact with citizens have therefore focused on urging senders to secure address labels and use clearer labelling. PTS <u>Annual Report 2024</u>.

 $^{^{\}rm 35}$ Chapter 3, Section 1 (2) of the Swedish Postal Services Act.

³⁶ Postal service points, postal access points, business centres and parcel lockers.

³⁷ The number refers to unique locations. In some cases, there may be several mailboxes in the same place, but these are then counted as *one* mailbox.

Table 8: Number of service points per distributor and geographical coverage in January 2025

Distributör	Antal servicepunkter 2025 (2024) ³⁸	Geografisk täckning 2025 (2024)		
		Antal	Antal	
	2 2 2 2 4 2 2 4	län	kommuner	
Bring, totalt	2 276 (1 974)	21 (21)	290 (290)	
Paketskåp/paketbox	674 (286)			
Paketombud	1 602 (1 688)			
Bussgods, totalt	272 (255)	21 (21)	120 (112)	
Paketombud ³⁹	263 (255)			
Paketskåp/paketbox	9			
DHL Freight, totalt	2 463 (1 893)	21 (21)	290 (290)	
Paketombud	1 858 (1 868)			
Paketskåp/paketbox40	605 (25)			
DHL Express, totalt ⁴¹	1 774 (1 398)	21 (21)	289 (267)	
Paketombud	1774 (1398)			
Iboxen, totalt ⁴²	984 (988)	16 (15)	95 (78)	
Paketskåp/paketbox	984 (988)			
Ica paket, totalt	606 (ny)	43		
Paketombud	606 (ny)			
Instabee, totalt	3 471 (2 915)	21 (21)	286 (287)	
Paketskåp/paketbox	3 471 (2 915)			
Postnord, totalt	4 615 (4 601)	21 (21)	290 (290)	
Paketskåp/paketbox	2 503 (2 445)			
Företagscenter ⁴⁴	184 (192)			
Postombud ⁴⁵	1580 (1594)			
Utlämningsställe ⁴⁶	348 (370)			
Schenker, totalt	1 630 (1 687)	21 (21)	290 (290)	
Paketombud	1 630 (1 687)			
UPS, totalt	691 (616)	21 (20)	208 (191)	
Paketombud	691 (616)			

The range of different types of service points have good geographical coverage. In many cases, competitors complement Postnord's service network within the universal postal service. It should be noted, however, that at about 970,000 of the country's addresses it is also possible to use Postnord's "Schedule rural postal delivery" service. It is a form of supplementary postal service where recipients have the option of having parcels delivered and collected by the rural mail carrier.

Postnord's supply of postal service points has remained relatively constant at about 1,600 in recent years, but there is a tendency for the number to decrease slightly. The number of postal access points is also declining, from 370 at the beginning of 2024 to 348 at the beginning of 2025. The supply of business centres continues to decrease as before, but as reported in *Swedish Postal Market 2024*³⁸, the range of business-related services has expanded at the regular postal service points.

^{38 &}lt;u>Swedish Postal Market 2024</u>, PTS-ER-2024:2, ref.no. 23-10441.

However, the range of service points has more than doubled in recent years through the establishment of parcel lockers. However, this expansion has slowed down in 2024 with only a marginal increase during the year. Overall, there has been no significant change in Postnord's total number of service points during the year.

Utveckling antal servicepunkter Postnord 2021-2025 5 000 4 500 4 000 TOTALT 3 500 3 000 -Box_Paketskåp 2 500 -Postombud 2 000 -Utlämningsställe 1500 1000 -Företagscenter 500 0 2022 2023 2021 2024 2025

Figure 5: Development of the number of service points Postnord 2021-2025

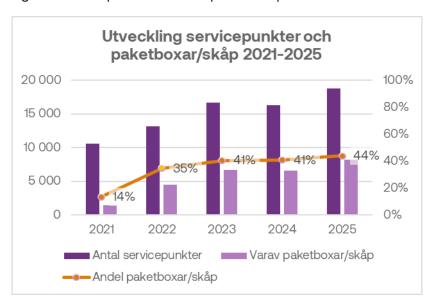
Postnord servicepunkter	2021	2022	2023	2024	2025
Box_Paketskåp		602	2 024	2 445	2 503
Företagscenter	206	201	195	192	184
Postombud	1 590	1 601	1609	1594	1 580
Utlämningsställe	366	396	390	370	348
TOTALT	2 162	2 800	4 012	4 601	4 615

Table 9: Postnord Service Points 2021-2025

The above table shows that the trend of Postnord's number of service points being relatively constant or slightly decreasing is the same for other stakeholders in the parcel market, while the number of delivery locations for parcel lockers has increased for several stakeholders in 2024 (see Figure 6 and Table 10 below). It can be noted, for example, that through an agreement with Iboxen, DHL and Bussgods have significantly increased access to locker deliveries within their respective networks, and that Bring has expanded its parcel locker network.

One addition to the market is ICA Paket, which from 2024 offers parcel deliveries where ICA stores act as parcel service points for the deliveries.

Figure 6: Development of service points and parcel lockers 2021-2025³⁹



År	2021	2022	2023	2024	2025
Antal servicepunkter	10 608	13 140	16 644	16 266	18 778
Varav					
paketboxar/skåp	1 446	4 555	6 749	6 655	8 242
Andel					
paketboxar/skåp	14%	35%	41%	41%	44%

Table 10: Development of service points and parcel lockers 2021-2025

³⁹ Here, PTS counts the total number of service points offered by different stakeholders. In many cases, distributors use the same service points and, given the development in 2024, this also applies to parcel lockers to some extent. In practice, the number of physical locations is less than the number of service points according to the PTS calculation method. An in-depth analysis of the geographical aspect of how different service points are located will be published in this year's edition of the report Swedish Parcel Market.

Appendix 1 — Overview market shares traditional letters by postal code

These appendices supplement the text in Section 2.2 on geographical volumes.

The following table presents the market shares of each stakeholder category in terms of the number of postal codes in which the operator has a certain market share. This is then illustrated in subsequent map images.

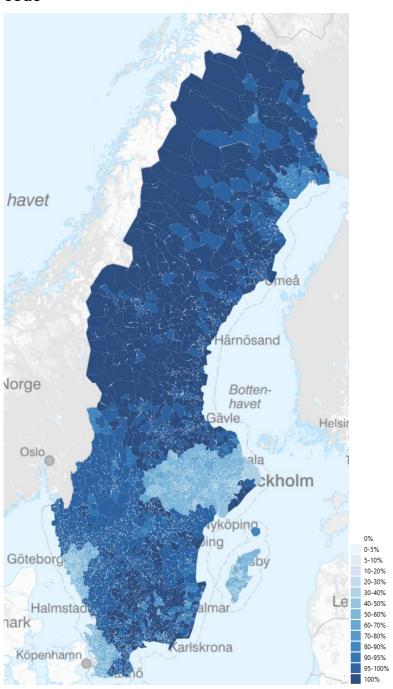
Table 11: Number of postal codes in which each stakeholder has a certain market share

Marknadsandel traditionella brev	Postnord	Citymail	Early Bird	Övriga
=0%	0	5631	2 715	10 549
>0%-5%	9	0	7 213	204
(varav <1%)	64	39	7 000	88
5%-10%	2	3	341	1
10%-20%	5	11	430	6
20%-30%	46	53	83	12
30%-40%	538	381	23	29
40%-50%	2 432	1920	9	13
50%-60%	1875	2 280	2	4
60%-70%	311	483	2	0
70%-80%	112	42	0	1
80%-90%	399	5	0	0
90%-95%	269	1	1	0
95%<100%	3 201	2	0	0
(varav >99%)	3 163	68	0	0
=100%	1 620	7	0	0

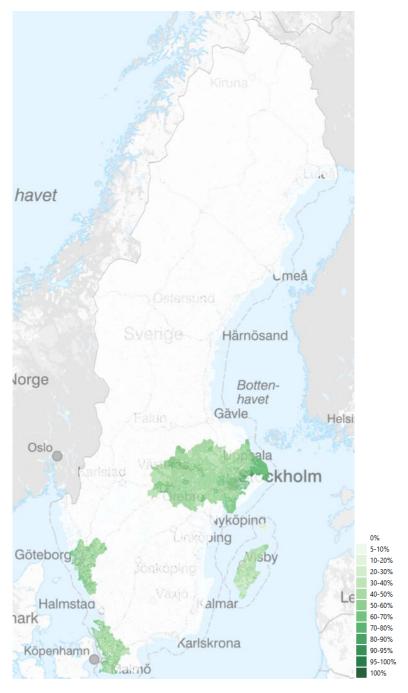
The division into tighter intervals for the lowest and highest market shares aims to clarify that there is essentially no major competition in terms of volume in these ranges. In most cases, the market share is close to 0% and 100% respectively, meaning that there is practically no real competition, even though single piece letters have been delivered by another stakeholder than Postnord.

Regarding the subsequent map images, the higher the colour saturation, the higher the market share of each respective stakeholder and postal code area.

Appendix 2 — Postnord: market share traditional letters by postal code



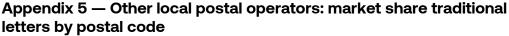
Appendix 3 — Citymail: market share traditional letters by postal code

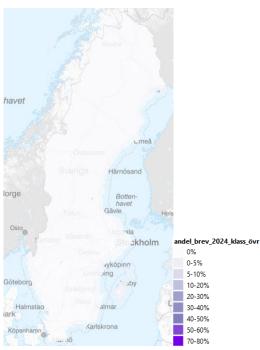


Appendix 4 — Early Bird: market share traditional letters by postal code



The map shows the overall geographical market landscape of the five morning newspaper distributors who, in addition to delivering parcel letters as part of the Early Bird cooperation, also deliver traditional letters. The issue here is not a country-wide delivery network, but the overall market landscape of these local/regional stakeholders.





As with the Early Bird map, the picture here is based on volume data reported from eight local postal operators. The above map mainly highlights the fact that these stakeholders operate in such small areas that they are basically not visible on a national map. To illustrate what this might look like at the local level, here are two examples. The first is from Bollnäs with its surrounding areas and the second from Mariestad with its surrounding areas:





However, Gotland is an exception in this respect, although the market share of the local operator there is in the range (0-5%).

It is worth noting that, in addition to a local operator, the other three categories of stakeholders also operate on Gotland.