

Analysis Matrix on Comments received from the public on Postal and Courier Market Structure

Feedback and Proposals on the Proposed Market Review.

The public has reviewed the proposed Postal and Courier market structure and wishes to share comments and proposals as per the table below.

S/No.	Submit ters name	Org.	Date of submis sion	Email Address	Section reference	Comments/prop osals	Justification	CA Comments
1.	Jane Njeri	Indivi dual	1st October 2025	janenjeri14220 00@gmail.com	18.2.1 Under the Public Operator Licence, it is proposed that the Public Postal licensee be exempted from paying the Universal Service Fees given the Universal Postal Service obligation they have, subject to relevant amendment of the KICA, 1998.	This proposal is contrary to the Kenya Information and Communications Act, 1998 (KICA,1998)	<p>i. A licence issued under the Kenya Information and Communications Act, 1998 (KICA,1998) cannot be exempted from paying Universal Service Fees. This is pursuant to Section 84J (3).</p> <p>ii. In addition, there lacks a legal definition of “Universal Postal Service”. Currently, the Act only mentions exclusive service.</p>	<p>This is noted and appreciated</p> <p>The proposal for exemption of the Public Postal Licensee from paying the Universal Service Fund levy is withdrawn.</p> <p>The Market Structure provides the scope of the Public Postal Operator with regards to public service and international obligations, to include provision of basic postal services.</p>

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2.	Jane Njeri	Individual	1st October 2025	janenjeri1422000@gmail.com	Section 16.3 - Where this is licensed, the individual riders offering services under the hailing service provider network will be deemed covered under the licence held by the licensed hailing service provider. The hailing service licensees shall be expected to vet and undertake KYC on the individual courier riders operating on their hailing service network	The market structure proposal should exclusively state that hailing service providers will only allow use of their platforms/interconnect with licensed courier operators. In addition, advise on whether this license category will be permitted to undertake postal services. Further to these, this proposal is untenable since CAK is transferring its mandate to another entity.	KICA,1998 and Section 47 of the Act in particular, has mandated CAK to exercise licensing and regulatory functions in respect of postal systems and services in Kenya in accordance with the Act. In this proposal, CAK will be transferring the licensing and regulation function, in respect to postal services, to hailing service providers. Further to these, the hailing service and/or a licensee should only interconnect and/or allow use of their network with licensed courier providers. In addition, advise if the hailing service providers can provide postal services.	There is need to clarify the scope of hailing services as follows: Just like normal courier services consist of logistics and transportation , Hailing Service providers' digital platforms facilitate logistics and transportation , with the only difference being that the courier the traditional outlet is replaced by the digital platform. All other services facilitated by the digital platform are similar to the scope of courier services. Therefore riders using hailing digital platforms are agents of the digital platform owners because they are onboarded to, branded with and managed by the digital platform. They are therefore part and parcel of the digital hailing courier service providers.

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3.	Jane Njeri	Individual	1st October 2025	janenjeri1422000@gmail.com	<p>Section 16.4</p> <p>Introduction of an Independent Courier personnel licence to address individual courier service providers who also provide courier services</p> <p>Section 22</p> <p>These license holders will be licensed to provide last-mile delivery and document-handling services by road, air, or water. This proposal will formalize and regulate individuals who offer such services often</p>	<p>This proposal is contrary to the Kenya Information and Communications Act, 1998 (KICA,1998) and other laws of Kenya.</p>	<p>This proposal provides an opportunity to existing courier companies to cease their National Courier Operations and acquire this licence. This will lead to loss in government revenue. What is the definition of last-mile delivery? What will be the areas of operation for this category of licence? By having hailing service providers utilise licensed operators, this category is unnecessary. In conclusion, the Companies Act recognises individual businesses as sole proprietors, keeping in mind that there are existing large courier operators who exist as sole proprietors. A licence issued under the Kenya Information and Communications Act, 1998 (KICA,1998) cannot be exempted from paying Universal Service Fees. This is pursuant to Section 84J (3).</p>	<p>This is noted, however the introduction of this licence category is not contrary to the KICA. However upon further consideration the Authority is of the opinion that there will be no need to introduce the Independent Courier License category.</p> <p>All players providing a service in this sub-sector should be licensed under the existing licence categories having been registered as Associations, Saccos or Individual entities.</p> <p>The proposal for exemption from paying the Universal Service Fund levy is withdrawn.</p>

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					on a freelance or small-scale basis			
4.	Uber/U ber Eats	Uber/ Uber Eats	15 Octobe r 2025	lmucha@ext. uber.com	Section 16.3 - “Introduction of a Courier Hailing Service provider licence targeting companies that leverage technology to manage courier services by linking customers with collection and delivery service providers”.	Consider a lighter-touch regulatory approach for technology platforms, perhaps a registration or notification requirement, rather than a full operating license, focusing on consumer protection aspects specific to the platform's role.	<p>Online delivery platforms primarily act as technology intermediaries connecting restaurants/merchants, customers, and independent delivery personnel. They do not directly "collect, dispatch, convey, handle, deliver or otherwise manage" the delivery of items themselves; rather, they facilitate these activities.</p> <p>Imposing a full courier license on a technology platform could stifle innovation and create an unnecessary regulatory burden. The core business is software and logistics coordination, not traditional mail handling.</p>	<p>This is not adopted</p> <p>The Act Section 47 (1) (k) mandates the Authority to further the advancement of technology relating to the post and postal services.</p> <p>In this regard, the Authority shall maintain the proposed license category for courier hailing services as these services are considered to fall within the definition of courier services that includes any specialized services for the collection, conveyance, dispatch, handling and delivery of postal articles. For this purpose, we deem the use of the hailing app as a specialized service.</p> <p>Also see clarification in 2 above.</p>

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5.	Uber/Uber Eats	Uber/Uber Eats	15 October 2025	lmucha@ext.uber.com	Section 16.3- “Where this is licensed, the individual riders offering services under the hailing service provider network will be deemed covered under the licence held by the licensed hailing service provider.”	This statement provides that individual riders providing services under the hailing services provider are deemed covered under the ‘Courier Hailing Service Provider’ licence is fundamentally flawed as it misrepresents the operational and legal relationship between the courier service provider and the technology platform providing the lead generation services. We recommend that any proposed amendments to the postal and courier market structure must clearly delineate the distinct relationship and	Online delivery platforms such as Uber, are technology intermediaries whose core business is the provision of technology lead generation services that connect a user with an independent courier. In particular, Uber does not provide delivery services; the independent courier does. Additionally, the independent couriers are not employees or agents of Uber, they are independent contractors operating their own businesses through the use of the Uber App (and other online e-hailing platforms). These independent couriers also multi- app, meaning they do not operate exclusively on the Uber App, but also operate on competitive online platforms (eg. Bolt). Therefore, the licence	The Authority shall review the market structure and require only licensed courier operators to enter into agreements with the licensed hailing service providers. In this case the app will be in the name of the licensed courier including branding, customer billing, and all other customer facing services will be handled by the licensed courier operators and not by the digital platform owner. The hailing digital platform will be completely a background service only visible to the licensed courier operator The independent courier operators that use the platforms will be licensed as Associations, Saccos or Individual entities in order to enhance the relationship between the hailing companies and the licensed courier operators.

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						corresponding obligations between technology platforms (hailing service providers) and the independent courier service providers who utilize those platforms.	to be held by the online delivery platform cannot legally or operationally cover the activities or liabilities of the independent courier personnel, who must be licensed as separate entities under the proposed legal framework.	1. The hailing service providers will be licensed separately as a full courier service provider. This will ensure regulatory oversight, accountability and consumer protection

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6.	Uber/Uber Eats	Uber/Uber Eats	15 October 2025	lmucha@ext.uber.com	Section 17 indicates that the “Annual Operating Fees” for the "Courier Hailing Service Provider” shall be Kshs. 100,000 or 0.4% of Gross Annual turnover of audited accounts, whichever is higher.	<p>Instead of a percentage of gross annual turnover, it is proposed that the 'Annual Operating Fees' for 'Courier Hailing Service Providers' be structured as a fixed annual fee (such as the proposed Kshs. 100,000).</p> <p>This approach would be more equitable, sustainable, and reflective of the actual economic activity and profitability of technology-driven delivery platforms, allowing them to continue</p>	<p>The imposition of an annual operating fee based on 0.4% of Gross Annual turnover of audited accounts for 'Courier Hailing Service Providers' is unduly burdensome and disproportionate.</p> <p>Online delivery platforms primarily operate on a commission-based model, where their 'turnover' represents the total value of goods transacted through their platform.</p> <p>However, their actual profit margins are typically very thin, as a significant portion of this gross turnover is passed directly to the merchants and delivery personnel. An operating fee based on gross turnover fails to distinguish between the</p>	<p>This proposal on use of a fixed annual fee is not adopted.</p> <p>The application of a percentage-based rate on annual revenue is aligned with international best practices, having been developed through public participation and is implemented by most regulators subject to jurisdictional considerations.</p> <p>The 0.4% is applicable only to the revenue accrued from licensable services (Courier Hailing Platform Revenue).</p>

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						<p>contributing to the digital economy without facing disproportionate regulatory costs.</p>	<p>platform's revenue (its commission) and the total value of transactions, thereby taxing a large portion of funds that are merely in transit or belong to other stakeholders in the ecosystem. This effectively imposes a levy on the entire value of the deliveries, not just the platform's earnings.</p> <p>A fee directly tied to gross turnover can become a significant disincentive for platforms to scale and expand their services, particularly in a competitive and high-volume, low-margin industry. As a platform grows its gross turnover, the operating fee dramatically increases, potentially eroding the already tight margins and</p>	

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							<p>making further investment in technology, marketing, or expansion into new areas and geographies less viable. This can stifle innovation and limit creation of earning opportunities within the gig economy.</p> <p>The scientific basis of the 0.4% of gross turnover fee has not been explained and this will only further increase the operational costs of companies in a sector that is already subject to a wide array of taxes including, corporate income tax, digital service tax, VAT and Significant Economic Presence Tax (SEPT) among other levies and local government taxes.</p>	
7.	Uber/U ber Eats	Uber/ Uber Eats	15 Octobe	lmucha@ext. uber.com	Section 17 indicates a	Re-evaluate the applicability of	The concept of a "universal service	This proposal is not adopted.

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			r 2025		"Universal Service Levy" of "0.5% of Gross Annual turnover of audited accounts" for "Courier Hailing Service Provider."	the Universal Service Levy to courier hailing service providers to allow for the growth of the emerging online deliveries sector.	obligation" (USO) and corresponding Universal Service Levy (USL) typically applies to essential services (like traditional postal services) to ensure availability across all geographical areas, including unprofitable ones. Online courier and food delivery, while convenient, is generally a commercial, non-essential service that thrives in areas with sufficient demand. Imposing a USL on food delivery platforms seems inconsistent with their commercial model and the nature of the service provided. This levy directly increases the cost of doing business for platforms, which could	Section 84J (3) of KICA requires all licensees to contribute to the Universal Service Fund Levy to support the provision of services in unserved and underserved areas within the country. The 0.5% is applicable only to the revenue accrued from licensable services (Courier Hailing Platform Revenue).

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							<p>be passed on to consumers or impact the profitability of the service, potentially reducing investment and expansion into new areas. It might also disproportionately affect smaller platforms or those operating on thin margins.</p> <p>Furthermore, online delivery platforms are subject to a wide array of taxes including, corporate income tax, digital service tax, VAT and Significant Economic Presence Tax (SEPT) among other levies and local government taxes. The inclusion of the Universal Service Levy will only increase the operational costs of these companies and discourage investment and innovation in this emerging sector.</p>	

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8.	Uber/U ber Eats	Uber/ Uber Eats	15 Octobe r 2025	lmucha@ext. uber.com	Section 22 provides “These license holders will be licensed to provide last-mile delivery and document handling services by road, air or water. ”	This is a positive and inclusive approach. The definition of modes of delivery should be broad enough to encompass all modes of transport used for delivery.	Including all forms of transport used for purposes of delivery is essential to capturing the full scope of the modern delivery ecosystem and innovative service models hence fostering a more inclusive market.	This is noted and appreciated.

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9.	Uber/Uber Eats	Uber/Uber Eats	15 October 2025	lmucha@ext.uber.com	General-explicit exclusion of delivery of food items and groceries from the proposed market structure	We recommend that the delivery of food and grocery items should remain outside the scope of the proposed market structure. This critical exemption will allow the Communications Authority to focus on postal/courier services while preventing unnecessary complexity and costs in the vital digital food delivery economy	<p>The food safety chain, from preparation to consumption, is already regulated in Kenya by multiple government agencies under various existing statutes and policies. Attempting to regulate the transportation or delivery element of food items under the Kenya Information and Communications Act (KICA) would be redundant, create compliance conflicts for food vendors and detract from the specialised food safety oversight that is already in place.</p> <p>Regulating food delivery platforms under a new courier license would also impose unnecessary financial burden (application, initial and</p>	<p>This is noted.</p> <p>We clarify that food and grocery are not prohibited materials under section 58 of the KICA. That notwithstanding, licensed courier operators need to comply with relevant laws governing items that they transmit by post or courier service.</p>

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							<p>annual operating fees, universal service levy) and bureaucratic requirements on a dynamic and high growth sector. The current model relies on low barriers to entry and innovative use of technology to provide quick, convenient services which has driven significant revenue growth. Introducing high licensing costs would likely be passed on to the consumer or the restaurant, ultimately hindering the expansion of e-commerce.</p>	

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10.	Lilian M. Wepukhulu	Riley Courier Limited	3 rd October 2025	info@rileyfalcon.co.ke; lilian.courier@rileyfalconsecurity.co.ke	B.2. Proposed Postal and Courier Market Structure 16. The revised market structure presents the following amendments: : 16.1. A revision of PCK's Initial License fees from KES.500,000 to KES 1,500,000. This is in recognition that the	We would suggest the current market structure to remain as it is. We are currently struggling to raise the current market structure due to high competition from Transport Companies and Boda Boda riders whose rates are too low.	We are currently struggling to raise the current market structure due to high competition from Transport Companies and Boda Boda riders whose rates are too low.	This is noted. We clarify that the revision of the initial licensing fee proposed in section B.2 is applicable to Public Postal Operator License only. No change in fees is proposed for the other license categories.

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					Kshs.500,000 initial fee was established over 20 years ago, and whose value has since been eroded by depreciation over the years, necessitating an increase to compensate for inflation			
11.	George Abasy	Bolt	15 th October 2025	0722772571	High Cost of Registration for Courier Hailing Services The proposed licensing fees under Regulation 20	introduce a tiered licensing fee structure that differentiates between traditional couriers and platform-based delivery hailing services,	Without a tiered structure, high fees could deter new entrants, limit scalability, and increase delivery costs for consumers, contradicting the RIS objectives of promoting expansion and affordability (refer to Section 2.0(ii, iii) of the RIS) As read together with the Finance Law, 2025	This is noted. The proposal for a tiered licensing fee structure is not adopted. Under the proposed licensing framework, traditional courier services and platform-based hailing services are distinct and

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					(Application of a Licence) will impose a significant financial burden on platform-based delivery hailing services like Bolt Food, which operate differently from traditional couriers. These costs fail to account for the low-margin, gig economy model of platforms.	reflecting their distinct operational models and cost structures. Conduct targeted stakeholder consultations to ensure proportionality. In this case, Tiered Licensing Fees: Implement a differentiated fee structure to support platform-based delivery hailing services.	VAT-exempt status for EV bikes, this risks reducing driver earnings and accessibility, undermining the goal of a vibrant e-commerce industry pursuant to Section 3.2(v) of the RIS.	hence cannot be combined under a tiered licensing framework.

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12.	George Abasy	Bolt	15 th October 2025	0722772571	<p>Percentile Charges on Gross Annual Turnover</p> <p>The proposed percentile charges on gross annual turnover lack justification in the RIS and are not detailed in the draft Regulations. These charges, combined with changes introduced by the Finance Act, 2025 impacts on EV bike costs, could disproportionately burden platform-based services, which rely on high transaction volumes and</p>	<p>Delete percentile charges or provide a transparent cost-benefit analysis in the RIS, as required by Sections 6 and 7 of the Statutory Instruments Act (Cap 2A). In the alternative, replace it with a flat, reasonable fee tailored to platform-based services.</p>	<p>Unjustified charges could force platforms to raise service fees, reducing courier earnings and consumer affordability. This is contrary to what is envisioned in Section 2.0 (iii) of the RIS goal of universal service access.</p>	<p>The proposal is noted.</p> <p>The use of percentage charges on determining annual license fee was adopted by the Authority in the year 2014, based on international best practices and subjected to stakeholder consultation.</p> <p>The 0.4% is applicable only to the revenue accrued from licensable services. In addition, levying annual operating fees as a percentage of the annual gross turnover for certain license categories is designed to ensure that regulatory fees are fair and proportionate to growth of a licensee's economic activity in the market.</p>

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					thin margins. In addition, fees or charges are to be supported by empirical evidence of necessity, proportionality, and fairness. In this case, there is no demonstrated link between the proposed levy and the actual regulatory costs incurred by the Authority.			
13.	George Abasy	Bolt	15 th October 2025	0722772571	Inadequate Regulation Title The title Kenya Information and Communications (Postal and Courier	Revise the title to Kenya Information and Communications (Postal, Courier, and Platform-Based Delivery Hailing Services) Regulations, 2025 to ensure clarity and alignment with the digital	An unclear/vague title risks misrepresenting the scope of regulated activities, potentially excluding platform-based services from fair regulatory consideration. This could hinder innovation and growth in the digital courier sector, contrary to the RIS objectives stipulated in Section 2.0(ii)).	This is noted to be outside the scope of the review of the market structure.

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					Services) Regulations, 2025 does not accurately reflect the inclusion of platform- based delivery hailing services, creating ambiguity and failing to acknowledg e their role in e- commerce and last- mile delivery in accordance with Section 3.2 (v) of the RIS.	economy goals outlined in the RIS.		

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14.	María Valls Roque	Glovo app Kenya Ltd	15 th October 2025	maria.valls@glovoapp.com	<p>The third schedule of the Communications Authority of Kenya Regulations proposes the introduction of a new licensing category: Courier Hailing Service Provider, with the following financial obligations:</p> <p>License Validity: 10 years Initial License Fee: KES 100,000 License Application Fee: KES 5,000 Annual Operating Fee: KES 100,000 or 0.4% of Gross Annual Turnover</p>	<p>Proposal to replace the 0.4% Gross Annual Turnover with a Fixed Annual Fee only</p>	<p>The current proposal for an Annual Operating Fee based on a percentage of Gross Annual Turnover poses a significant challenge to Glovo's financial model, as this levy is burdensome for growth, and fundamentally misleading and punitive, misrepresenting our operational reality. As a high-volume, low-margin intermediary, with substantial and fluctuating operating costs due to the on-demand nature of our business and the different revenue flows happening in our ecosystem, the majority of the gross revenue collected is immediately paid out to local partner restaurants and riders; therefore, taxing this large base results in a high effective tax rate relative to our actual financial capacity (the small commission). Such a levy punishes scale, efficiency, and the act of connecting parties, directly stifling expansion, innovation, and the ability to reinvest. Furthermore, this variable,</p>	<p>The proposal for fixed annual fee only is not adopted.</p> <p>The use of percentage charges on determining annual license fee was adopted by the Authority in the year 2014, based on international best practices and subjected to stakeholder consultation.</p> <p>The percentage is applicable only to the revenue accrued from licensable services. In addition, levying annual operating fees as a percentage of the annual gross turnover for certain license categories is designed to ensure that regulatory fees are fair and proportionate to growth of a licensee's economic activity in the market.</p>

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					(GAT), whichever is higher Universal Service Fund (USF) Contribution : 0.5% of GAT.		turnover-based fee creates unpredictable financial planning and constitutes a double taxation risk, acting as an additional regulatory tax on top of existing corporate taxes and the new Universal Service Levy, which ultimately undermines Kenya's competitive environment for Foreign Direct Investment (FDI). To ensure a truly facilitative licensing environment that promotes market access and stability, we strongly urge the adoption of a simple, fixed annual amount (such as the proposed KES 100,000 for International Operators) instead of a punishing variable levy.	
15.	María Valls Roque	Glovo app Kenya Ltd	15 th October 2025	maria.valls@glovoapp.com	Universal Service Fund (USF) Contribution: 0.5% of GAT.	The 0.5% Universal Service Levy (USL is primarily used to fund the PCK creating a compulsory cross-subsidy. To eliminate this	The current structure of the USL contradicts the goal of fostering a free market and promoting fairness by creating an anti-competitive cross-subsidy. The USL compels commercial operators to fund the services of the PCK, the entity	The statement that the USF levy is used to fund the services of PCK is incorrect. The purpose of the Fund is to support the rollout of accessible, affordable, and available ICT services in unserved and underserved areas.

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						<p>distortion, the USL should be waived entirely for all commercial operators.</p> <p>The application of the Universal Service Levy (USL) be strictly limited only to revenue generated from services that directly compete with Reserved Basic Postal Services.</p> <p>Suspend the application of both the 0.4% and 0.5% Gross Annual Turnover levies until a full and transparent consultation process is completed.</p> <p>As a prerequisite for any further discussion on these fees, the Authority must publicly release the</p>	<p>explicitly responsible for the USO, which distorts competition. This contradicts the RIS objective to "Promote fairness and a free market".</p> <p>Furthermore, any application of the USL should be strictly limited to revenue generated from services that directly compete with traditional, reserved postal services (e.g., letter mail delivery up to 350 grams), acknowledging the shift to modern e-commerce logistics. Given the modern shift toward e-commerce logistics and digital services, Glovo's core business—the delivery of food and goods—falls squarely under unreserved postal services that are already market-driven and competing efficiently.</p> <p>The current regulatory process suffers from a fundamental procedural failure and an absence of data modelling. The Regulatory Impact Statement (RIS) fails to include a</p>	<p>Section 84 (J) (2) of KICA, stipulates that the object and the purpose of the Fund shall be to support widespread access to, support capacity building and promote innovation in information and communications technology services.</p> <p>The use of percentage charges on determining annual license fee was adopted by the Authority in the year 2014, based on international best practices and subjected to stakeholder consultation.</p> <p>The percentage is applicable only to the revenue accrued from licensable services. In addition, levying annual operating fees as a percentage of the annual gross turnover for certain license categories is designed to ensure that regulatory fees are fair and proportionate to growth of</p>

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						<p>complete technical and economic modelling and data-driven impact assessment used to calculate and justify these specific percentage levies</p>	<p>quantitative Cost-Benefit Analysis (CBA) or present the financial modeling legally required under the Statutory Instruments Act to justify the 0.4% and 0.5% fees.</p> <p>The only fee justification provided—compensating the Public Postal Operator (PPO) for inflation after 20 years—is arbitrary and is insufficient grounds for charging new market entrants, like Courier Hailing Service.</p> <p>The lack of supporting data is compounded by a flawed competitive assessment underpinning the USL's cross-subsidy. The Authority has offered no evidence to support the core regulatory assumption that the Courier Hailing Service Provider is a direct, substantial competitor in the PCK's reserved mail market</p>	<p>a licensee's economic activity in the market.</p>