

# The Compensation Fund on the Postal Market: The Polish Case



Mateusz Chołodecki

## 1 Introduction

In 2008, the EU adopted the third postal directive. This legislation introduced the legal basis for gradual market opening. It set a deadline of 31 December 2010 for full market opening for 16 member states and 31 December 2012 for the remaining 11 member states, mostly from the Central and Eastern European countries (Crew and Kleindorfer 2008, p. 3; Snażyk 2015, p. 13). The third postal directive also changed the method, in which the universal postal service could be provided and financed. Additionally, the directive required the EU Commission to provide assistance to member states on its implementation, including the calculation of any net cost of the universal service (Bailly and Meidinger 2011).

Similar to other postal markets in Europe, the Polish postal market was monopolized until the end of the twentieth century. The monopolized postal market contained one state owned postal operator Poczta Polska S.A. (PP),<sup>1</sup> which used to be a part of the government. Liberalization of the postal market in Poland came after its accession to the EU in 2004, which began a long process of demonopolization. On 1 January 2013, a newly adopted Postal Law Act,<sup>2</sup> which had implemented the third EU postal directive, overturned the last exclusive rights held by PP Poland which was one of the last countries to fully open its postal market in EU (Snażyk 2015, p. 13).

---

<sup>1</sup>PP is a joint-stock company solely owned by the state.

<sup>2</sup>Act of 1 January 2013 Postal Law, consolidated text Journal of Laws of 2012, item 1529, as amended.

---

M. Chołodecki (✉)

Faculty of Law and Administration at Adam Mickiewicz University in Poznań,  
Poznań, Poland

e-mail: [mateusz.cholodecki@amu.edu.pl](mailto:mateusz.cholodecki@amu.edu.pl)

Based on the third EU postal directive, the Polish Postal Law Act required that the net cost of universal service obligations be shared between providers of services (Art. 108 Postal Law Act), establishing a compensation fund. The compensation fund is to be financed by all the service providers that offer universal services, including the designated postal operator. In 2017, there were 54 postal operators in Poland.<sup>3</sup> From 2013, PP has been the designated universal services provider (until 2025). However, PP has only once declared the net cost of the universal service obligations, that is, for 2013. At the same time, PP market share has been constantly decreasing, in terms of both volume and revenues. Such a situation raises questions about why PP does not declare a revised net cost.

The aim of this paper is to characterize the legal aspects of the Polish compensation fund and examine whether it can create an entry barrier to the services falling within the scope of universal service for postal operators. In the paper the key legal elements of the compensation fund are shown. Section 2 presents the scope of the universal postal service under the EU and Polish law. Section 3 describes the institution of the designated operator on the postal market and tariff setting for universal service. Section 4 demonstrates the net cost calculation. Section 5 characterizes the compensation fund on the postal market and presents the legal procedure in which the designated operator can receive the subsidy from the fund. Section 6 describes and discusses the methods of financing the universal service in the telecommunication market in Poland. Postal and telecommunication markets have almost the same universal service obligation regulations. Moreover, these two markets share the same regulatory authority. Section 6 concludes the paper.

## 2 The Universal Postal Service

Universal postal service can be characterized by its commercial nature and specific mission (Szydło 2006, p. 119). Crew and Kleindorfer proposed the definition of a universal service obligation as the “provision of a ubiquitous service at a uniform price and quality” (Crew and Kleindorfer 2000, p. 5). Legal sources of universal service can be found in the international law, the EU law<sup>4</sup> and in the Polish law (Rowsell 2016, p. 33–35).<sup>5</sup> In EU postal regulation, the universal service plays a key role. Thus, guaranteeing universal service for users is the primary obligation of the EU member states.

The most important basis for current legislation in Poland is the third EU postal directive, which obligates all member states to ensure the right to a universal service

---

<sup>3</sup> Source: UKE. (2018). Report on the state of the postal market in 2017.

<sup>4</sup> Basically: Art. 36 of the Charter of Fundamental Rights of the EU (CFR) and Art. 14, the Treaty on the Functioning of the EU (TFEU).

<sup>5</sup> There are constitutional sources of universal service in Poland: Art. 20 of the Constitution of the Republic of Poland (CRP), Art. 32 CRP (prohibition of discrimination), or Art. 69 CRP (special assistance for the disabled).

for all users. The third EU postal directive defines very detailed requirements for universal service. EU law obligates that the universal service must involve the permanent provision of a postal service of specified quality at all points in their territory at affordable prices for all users (Art. 3).

Art. 12 of the third EU postal directive also requires that tariffs for each part of the universal service must be affordable, cost-oriented, transparent, and non-discriminatory and give incentives for an efficient universal service provision. A uniform tariff shall not prevent a universal service provider to conclude individual agreements on prices with users, but in doing so shall apply the principles of transparency and non-discrimination with regard both to the tariffs and to the associated conditions.

Responsibility of these principles rests with the postal regulator. Member states must provide adequate legal instruments for postal regulators to enforce these principles. Most of the legal instruments held by the postal regulator in Poland – the President of the Office of Electronic Communications (the President of UKE) – are related to the universal service (Chołodecki and Popowska 2018, p. 18–19).

Polish documents emphasized that universal service must be of good quality and affordable (Snażyk 2015, p. 72, 82).

According to the Article 45 (a) of the Postal Law Act, universal service includes postal services provided in domestic and cross-border traffic, covering clearance, sorting, transport, and delivery of letter items including items for the blind and postal parcels. Sorting, transport, and delivery of postal parcels sent from abroad are part of universal service as well. Article 46 (2) of the Postal Law Act defines that the universal service must be provided in uniform manner under comparable circumstances. Designated operator must provide universal service throughout the whole of the national territory, comply with the routing time indicators, offer affordable prices, ensure frequency of service, and provide sender a document confirming the receipt of a recorded item.

For the end users, liberalization of the postal market hardly changed under the universal service provision. PP is still the universal service provider, and the scope of universal service has remained almost the same. This is particularly noticeable, in legal proceedings in Poland. Article 17 of the Postal Law Act states that only a recorded item issued by PP has the power of an official document. Thus, a letter, being a part of universal service, sanded only by the designated operator is tantamount to bringing it to court or public institution. This exclusive right of the designated operator must be seen as a near-monopoly because alternative postal operators cannot compete with the designated operator on this important segment of the postal market.

### 3 The Designated Operator

According to the EU postal regulations, member states may designate one or more entities as universal service providers. Member states may designate different entities to provide different elements of universal service and/or to cover different parts

of the national territory (Art. 4.2 of the third EU postal directive). In the EU, only Germany does not formally designate a universal service provider.<sup>6</sup>

The Polish legislature declared that only a single postal operator can provide universal service. Polish postal regulation has designated PP to be this provider. At the same time, the universal service provider has the right to subcontract some of their activities within a universal service. PP makes use of this right and subcontracts part of their activities.

The designated operator must be appointed for the period of 10 years by the President of UKE by administrative decision<sup>7</sup> from among postal operators selected in the course of a contest. Postal law contains detailed requirements for the contest. According to Art. 71 (2) of the Postal Law Act, the postal operator must have a network of postal points of contact and dispatch centers, means of transport, and financial liquidity. Presently only PP could satisfy these requirements. For the first 3 years after the Postal Law Act entered into force, PP became the designated operator by law (from 2013 to 2015). In 2015, the postal regulator was obligated to select a new designated operator to provide universal service for the next 10 years (2015–2025). Only two postal operators took part in the contest for the designated operator that was judged by postal regulators: PP and an alternative operator, InPost, which led to a strong competition between them. Nevertheless, PP won the contest. Additionally, InPost lost other important contest (public tender) for providing mail service for common courts in Poland in 2015.<sup>8</sup> Shortly after, InPost announced termination of its activity in the letter segment of the postal market.

To understand the net cost of universal service provision, it is essential to demonstrate the legal mechanism for establishing tariffs. Tariffs set by the designated operator must comply with annual price caps for universal service set by the President of UKE (Poland's postal regulator) for 3-year periods. The postal regulator should set the price cap with regard to the costs of universal service provision, ensuring price affordability as well as market and economic conditions. In fact, the minister responsible for communications, in agreement with the minister responsible for public finances, lays down by ordinance a method for setting the annual price caps for universal service tariffs.<sup>9</sup> The price cap may be set for a particular universal service or for those services grouped together due to their similarity. The postal regulator has power to change its decision and determine the annual price caps for universal service tariffs at any time (Chołodecki and Popowska 2018, p. 16).

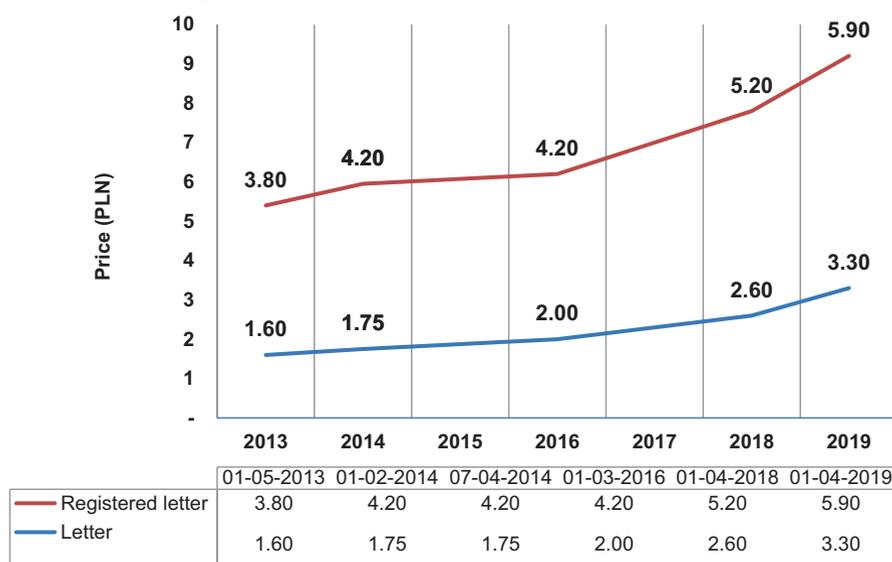
---

<sup>6</sup> Deutsche Post DHL is a designated operator in terms of international postal regulations, i.e., for the Universal Postal Union.

<sup>7</sup> Party may appeal against the President UKE administrative decision to the administrative courts [Administrative Voivodeship Court in Warsaw]. The judicial control exercised by the administrative courts against the decisions is performed on the basis of the legality (model of cassation).

<sup>8</sup> The public tender for providing mail service for common Courts in Poland in 2016–2018 was won by PP and 2019–2022.

<sup>9</sup> Ordinance of the Minister of Administration and Digitization of 6 May 2013 on the methodology for setting maximum annual levels of fees for universal services, Journal of Laws of 2013, item 543.

**Table 1** Prices of register letters and normal letters 2013–2019, tariffs of the PP

Source: The President of UKE decisions available on [www.uke.gov.pl](http://www.uke.gov.pl)

Since 2013, when the Postal Law Act came into force, PP has changed the universal service tariffs six times. Table 1 shows that the price for most common services has increased:<sup>10</sup> 64% for domestic registered letters<sup>11</sup> and 48% for domestic normal letters.<sup>12</sup> At the same time, PP has delivered approximately 98% of letter items in the universal service category.<sup>13</sup> In 2017, PP has had PLN 564.7 million of turnover in universal services and reported PLN 2778.7 million of revenue. The letter market is the most important part of PP activity as designated operator in terms of both volume and revenues. Constantly declining letter market is an essential financial issue for PP. Thus, PP can maintain price tariffs for universal service and record the net cost or increase the price tariffs. The second option is much more convenient for PP since Postal Law Act does not give appropriate legal instruments for price regulation to the postal regulator. That is one of the reasons why PP has not declared net cost on universal service since 2014.

<sup>10</sup>Yearly price indices of consumer goods and services in Poland were 2013, 0,9%; 2014, 0%; 2015, -0,9%; 2016, -0,6%; 2017, 2,0%; and 2018, 1,6%. [<https://stat.gov.pl/en/topics/prices-trade/price-indices/price-indices-of-consumer-goods-and-services/yearly-price-indices-of-consumer-goods-and-services-from-1950/>].

<sup>11</sup>According to the Postal Law Act, registered item is a letter item which is a recorded item, transported and delivered in a manner that protects it against loss, partial loss of its contents, or damage.

<sup>12</sup>According to the Postal Law Act, letter item is an item of correspondence or a printed form, excluding direct mail.

<sup>13</sup>Source: The UKE Report on the state of the postal market in 2016

## 4 Calculating the Net Cost

The EU postal directive contains a legal definition of the “net cost” of universal service obligations. According to this definition, the net cost is any cost related to, and necessary for, the operation of the universal service provision (Annex I Postal Directive). This legal definition does not reflect the appropriate sense of the “net” cost, since this is the definition of the gross cost, which does not take into account revenue. The Postal Law Act contains the appropriate definition, which states that the net cost of the universal service obligation shall constitute the difference between the net cost for a designated operator for operating with the universal service obligations and the same postal service provider operating without the universal service obligations, decreased by intangible benefits related to the provision of universal services and the benefits resulting from special or exclusive rights granted to the designated operator (Art. 106 the Postal Law Act). The designated operator in calculating the net cost must take into account costs related to universal service provision, revenues from universal service provision, intangible benefits related to universal service provision, and benefits resulting from special or exclusive rights granted to the designated operator that can take into account reasonable profit based on the rate of weighted average cost of capital. There is a net cost for financing only if the provision of universal service led to a loss.

The net cost in Poland is financed by some of the postal operators and by the state budget, if the sum of shares in the subsidy is insufficient to finance the net cost. Only those postal operators that provide the universal service or services within the scope of universal service are obliged to contribute to cover the net cost.<sup>14</sup> Additionally, a contributing operator’s revenue from those services must exceed one million PLN. The amount of the postal operator’s contribution to the subsidy may not be higher than 2% of its revenues from services within the scope of universal service.

Participation to the compensation fund is a form of tax for obliged postal operators. A tax is generally considered as a compulsory financial contribution in order to fund public expenditures. There is no doubt that the universal service is a public duty. Thus, postal operators providing services falling within the scope of universal service must pay extra contribution (tax) to the state via postal regulator. Such a charge is an entry barrier for new postal operators and thus can limit the competition on the universal service market (Fee et al. 2004).<sup>15</sup>

---

<sup>14</sup>The segment of the services falling within the scope of universal service includes letter items and postal parcels of the weight and dimensions specified for universal service and items for the blind, not provided by the designated operator to offer universal service. Services falling within the scope of universal service do not include postal services consisting in clearance, sorting, transport, and delivery of courier items.

<sup>15</sup>Economists have not yet been able to reach a broad consensus over the definition of an entry barrier, although I acknowledged the entry barrier as proposed by Fee, Preston, R., Hugo M. Mialon, and Michael A. Williams that “an economic barrier to entry is a cost that must be incurred by a new entrant and that incumbents do not or have not had to incur.”

The Table 2 below shows a simulation of the prediction of the net cost of universal service obligation for PP in 2013. The last time the PP declared the net cost of the universal service was for 2013. So far, the postal regulator responsible for the compensation fund did not pass the final decision (see Section 5).

Official data provided by the postal regulator shows that, at the end of 2016, 291 entities were registered as postal operators in Poland. Only 151 postal operators carried on actual business activities in the field of postal services. In the segment of services falling within the scope of universal service, 53 postal operators operated in 2017. The total share of the four largest operators (excluding the PP) providing services in the segment of services falling within the scope of universal service amounted to approximately 99% in revenues and in the volume of services in this segment. To summarize, the net cost is financed mainly by the designated operator. Currently, besides PP, only four of the postal operators are large enough to be required to contribute to cover PP net cost.

**Table 2** Simulation of the prediction of the net cost of universal service obligation for PP in 2013

	<b>Analytical position</b>	<b>Amount in PLN (million)</b>		<b>Comments</b>
1.	Revenues from the universal service	3 252,3		
2.	Cost of the universal service	3 347,4		
3.	Elements of the net cost	322,3		elimination of unprofitable postal points, reduction of delivery of postal items in rural areas, cost of capital
4.	Indirect benefits for PP as designated operator	182,8		
5.	The net cost of the universal service obligation in 2013	139,5		Difference from point 3 and 4
6.	The amount of redress	<b>95,1</b>	<b>100%</b>	The amount of loss
7.	PP participation in the compensation fund	84,6	<b>89%</b>	2% revenues from the universal postal service
8.	The amount for PP	10,5		Difference from point 6 and 7
9.	Alternative operators	4,4	<b>4,6%</b>	2% revenues from alternative operators
10.	State Budget	6,1	<b>6,4%</b>	the sum of shares by alternative operators is insufficient to finance the net cost

Source: Borowiec 2017, p. 46

## 5 The Compensation Fund

The EU postal directive contains four basic methods for financing universal service. Two involve public funding either directly or through procurement. It also allows, and Poland has adopted, the compensation fund financed by service providers as described above. This is similar to that established for telecommunications (as described in the next section). The compensation fund is administered by the postal regulator, which issues a decision comprising the verified net cost, loss on universal service, and the level of contribution to the compensation fund, with a 30-day time limit for paying the contribution to the subsidy.

Prices of the universal service provision are set by the minister in the ordinance. The postal regulator does not have any legal instrument against the tariffs set by the designated operator, if they are set within the limits of a price cap. Moreover, more than 90% of the subsidy to the compensation fund is paid by the designated operator and the state budget. For the designated operator, it is better to increase prices for the universal services rather than incur a financial loss on the universal service, particularly in case, when the designated operator does not have any competitors on the letter market. Such a situation is contrary to Art. 108 of the Postal Law Act.

According to the Postal Law Act, in order to receive subsidy from the compensation fund, several actions must be taken. It is complex proceedings, which involves several entities. Though, only the designated operator is entitled to initiate the compensation fund. The President of UKE decides on the final subsidy. Diagram 1 shows the procedure of the compensation fund according to the Postal Law Act.

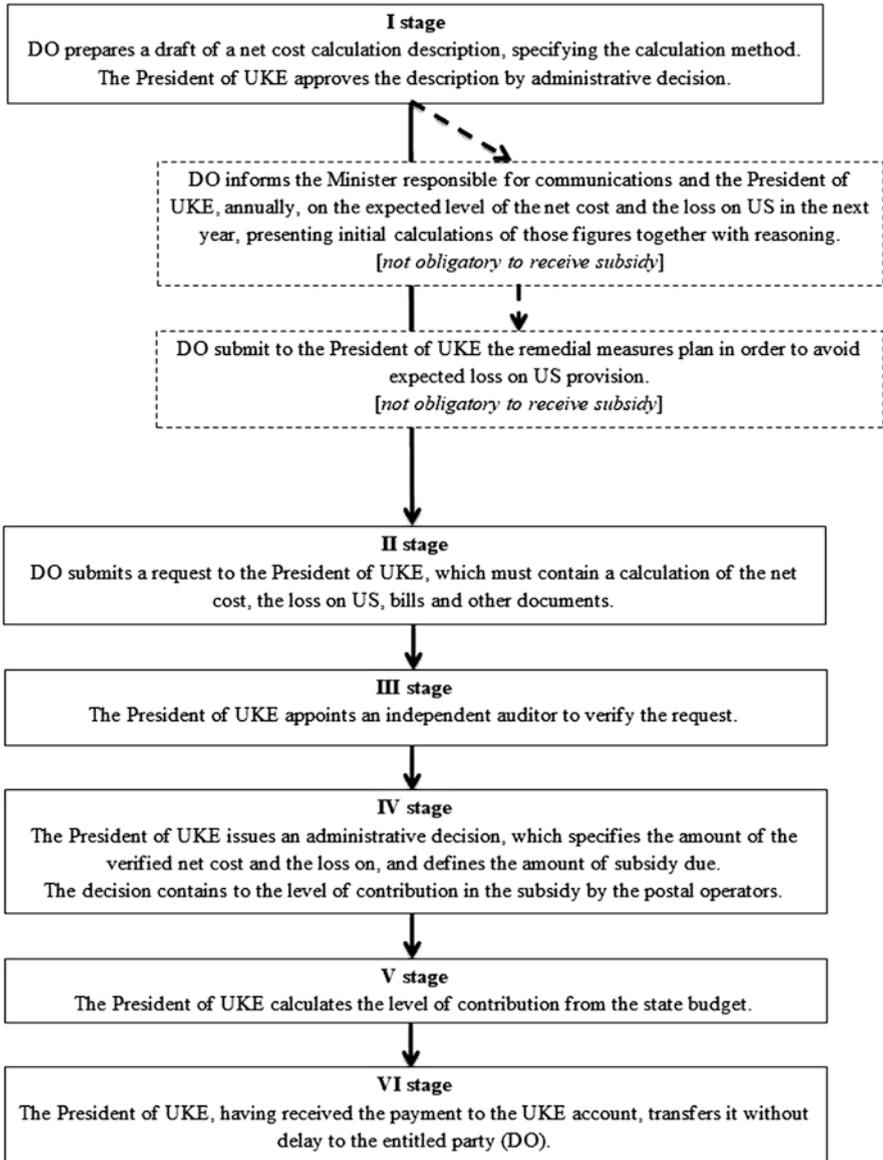
## 6 The Compensation Fund on the Telecommunication Market in Poland

Postal and telecommunication sectors have the same obligation to provide universal service for users (Fratini 2016, p. 154). Additionally, the universal service in the EU telecommunication sector was regulated prior to the postal one (Eccles 2011 p. 152–162). In Poland, these two markets share the same regulator – the President of UKE. The method of financing universal service on the telecommunication market in Poland is very similar to the method described in the Polish postal law. Thus, I will show only the major differences between the regulations on both markets.

Article 3 (1) of the Universal Service Directive<sup>16</sup> obligates the EU member states to ensure that the universal services are available with the quality specified to all end users in their territory, independently of geographical location, in the light of spe-

---

<sup>16</sup>Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on universal service and users' rights relating to electronic communications networks and services (Universal Service Directive) (OJ L 108 24.4.2002, p. 51). Similar regulation is in Art. 84 Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code (Recast), (OJ L 321, 17.12.2018, p. 36–214).



**Diagram 1** Procedure of the compensation fund according to the Postal Law Act

cific national conditions, and at an affordable price. Similar to the postal market, the price of the universal service is one of the most important factors in EU electronic communications regulations. Available methods of financing universal telecommunication service are fairly similar to the postal regulations. It can be a mechanism to compensate from public funds or to have providers of electronic communications networks and services share the net cost of universal service obligations.

According to Art. 81 of the Polish Telecommunication Law Act,<sup>17</sup> the universal service is a set of telecommunications services, including facilities for the disabled, provided in any technology, preserving good quality and at a reasonable price, which should be available in the territory of Poland. This set includes services: connection of a network termination point at a fixed location, capable of supporting voice, facsimile and data communications, including functional Internet access at rates supporting the use of common applications to handle current daily life matters, maintaining the subscriber line with a network termination point ready for providing national and international telephone calls, national and international telephone calls, nationwide directory enquiry services, available also to the users of public payphones or other points of access capable of voice communications, nationwide directories, and the provision of telephone services by means of public payphones or other points of access capable of voice communications.

The telecommunication law does not allow the unilateral designation of the undertaking for the universal service provision. Designation is made only if the results of consultations made by the President of UKE show that any universal service is unavailable or is not provided with good quality and at the affordable price. Since 2011, there has not been any designated operator in the telecommunication market. Universal service has been carried out fully by the highly competitive telecommunication market in Poland.

The definition of net cost in the Telecommunication Law Act differs from that in the Postal Law Act. Net cost in the Telecommunication Law Act refers only to those costs that would not be incurred by a designated service provider if it did not have an obligation to provide that service. The President of UKE in calculating the net cost takes into account costs, revenues, and indirect benefits related to universal service provision. In the next step, the President of UKE determines telecommunications undertakings obliged to finance the subsidy and the proportion of their contribution to the subsidy immediately having determined the subsidy due. The President of UKE determines a uniform rate of percentage contribution for all telecommunications undertakings obliged to participate in financing the subsidy. Only telecommunication operators, who have revenue from telecommunications activities above 4 million PLN in the calendar year, for which the subsidy is due, contribute to the subsidy. Their contribution cannot be higher than 1% of their revenue. It means that all telecommunication operators are obliged to participate in financing the net cost regardless of their scope of business activity. To illustrate this, in 2010, the designated operator to provide universal service – Orange Polska S.A. – applied for PLN 269 436 354.80 as a net cost, whereas the President of UKE calculated only PLN 51 410 495.71. There were 117 telecommunication entities obligated by the President of UKE to pay 0.12% of their total revenue. The subsidy from the compensation fund for 2010 was paid to the designated operator in 2018. Such a long

---

<sup>17</sup> Act of 16 July 2004 Telecommunications Law, consolidated text Journal of Laws of 2018, item 1954, uniform text.

period was caused by the ongoing administrative and court-administrative procedure related to determining the final amount of the subsidy.

The compensation fund from the Telecommunication Law Act does not create entry barrier for the telecommunication market compared to the compensation fund from the Postal Law Act since all telecommunications entities are obliged to participate in financing the subsidy. Moreover, an administrative procedure that takes almost 10 years must be seen as inefficient. A similar situation exists in the postal market in Poland with net cost from the 2013.

## 7 Conclusions

The key component of the universal postal service is its affordable price. Together with other requirements such as postal points of contact and delivery frequency across the whole national territory, universal service can generate financial losses for the service provider. The Polish Postal Law Act determines the scope of the universal service very precisely and does not give the designated operator any freedom to modify it. Thus, financing of the universal service must be ensured by law.

The EU postal regulation provides several possible methods of financing universal postal service. One of the methods is the compensation fund. The mechanisms of the compensation fund can differ from each other as is illustrated in the postal and telecommunication markets. The differences between the regulations are not significant; however, they can have a strong impact on the market situation. Two important factors are the entities participating in the compensation fund and participation in the compensation fund by the state budget.

My analyses conducted in this paper show that the compensation fund regulation in the Polish Postal Law Act creates an entry barrier for new postal operators and thus can limit the competition on the universal service market. The entry barriers are the special contribution (tax) paid by postal operators providing services within the scope of universal service to the compensation fund and the privileged position of the PP as designated operator. Moreover, the PP is the biggest participant in the compensation fund, and thus, it is not interested in updating the net cost of the universal service obligations. L. Borowiec presented prediction of net cost for 2013, where the designated operator – PP – shall participate in approx. 89%, alternative postal operator in approx. 5%, and state budget in approx. 6% (Borowiec 2017, p. 46). PP is a fully state-owned company. The last time PP declared a net cost of the universal service obligation was in 2013. Contrary to the Postal Law Act, the costs of the universal service obligation have been paid by the end users since the price of the registered letters has increased for approx. 67% in the last 6 years. Summarizing, the Postal Law Act creates an entry barrier by the compensation fund and does not regulate tariffs of the universal service provision, which give the designated operator a favored position on the market. Thus, financing universal service from the state budget should be considered as the most efficient solution for the market (Visco-Comandini 2018, p. 117; Chołodecki 2019, p. 40).

Maintaining the compensation fund requires essential changes similar to those pursued in the telecommunication market in Poland. Most of all, all postal operators should participate in the compensation fund. Such a change can potentially decrease the prices of universal postal service in Poland and, thus, make it more affordable and contribute to consumer welfare.

## References

- Bailey, D., & Meidinger, M. (2011). The dual trend towards operational efficiencies and social regulation in European postal service. In M. A. Crew & P. R. Kleindorfer (Eds.), *Reinventing the postal sector in an electronic age*. Cheltenham: Edward Elgar.
- Borowiec, L. (2017). Fundusz kompensacyjny jako metoda finansowania powszechnych usług pocztowych. *Annales Universitatis Mariae Curie-Skłodowska, sectio H – Oeconomia, LI(5)*, 41–49.
- Chołodecki, M. (2019). Fundusz kompensacyjny na rynku telekomunikacyjnym i pocztowym. *iKAR, 3(8)*, 31–41.
- Chołodecki, M., & Popowska, B. (2018). Instrumenty prawne Prezesa UKE na rynku pocztowym. *iKAR, 1(7)*, 8–22.
- Crew, M. A., & Kleindorfer, P. R. (2000). Liberalization and the universal service obligation in postal service. In M. A. Crew & P. R. Kleindorfer (Eds.), *Current directions in postal reform*. Boston: Kluwer.
- Crew, M. A., & Kleindorfer, P. R. (2008). Regulation and the USO under entry. In M. A. Crew & P. R. Kleindorfer (Eds.), *Competition and regulation in the postal and delivery sector*. Cheltenham, Northampton: Edward Elgar.
- Eccles, R. (2011). State funding and cost sharing of the USO under the 2008 EU postal services directive. In M. Crew & P. Kleindorfer (Eds.), *Reinventing the postal sector in an electronic age*. Cheltenham: Edward Elgar.
- Fee, P. R., Mialon, H. M., & Williams, M. A. (2004). What is a barrier to entry? *American Economic Review, 94(2)*, 461–465.
- Fratini, A. (2016). Compensation fund under EU law: A suitable solution for the postal market? In M. L. A. Crew & T. J. Brennan (Eds.), *The future of the postal sector in a digital world*. Cham: Springer.
- Rowell, C. (2016). Origins of “universal service”. In M. L. A. Crew & T. J. Brennan (Eds.), *The future of the postal sector in a digital world*. Cham: Springer.
- Śnażyk, Z. (2015). *Świadczenie pocztowej usługi powszechnej w warunkach liberalizacji rynku*. Warszawa: C.H. Beck.
- Szydło, M. (2006). Usługa powszechna w telekomunikacji jako instytucja prawa Wspólnoty Europejskiej. *Przegląd Sądowy, 16(5)*, 107–128.
- UKE. (2018). *Report on the state of the postal market in 2017* [https://uke.gov.pl/download/gfx/uke/en/defaultaktualnosci/36/96/1/report\\_on\\_the\\_state\\_of\\_the\\_postal\\_market\\_in\\_2017.pdf](https://uke.gov.pl/download/gfx/uke/en/defaultaktualnosci/36/96/1/report_on_the_state_of_the_postal_market_in_2017.pdf).
- Visco-Comandini, V. (2018). Is the compensation fund an appropriate tool for financing universal postal service obligations? In P. Parcu, T. Brennan, & V. Glass (Eds.), *New business and regulatory strategies in the postal sector. Topics in regulatory economics and policy*. Cham: Springer.