

ORR - Rail Market Review Consultation - September 2014

Replies to the questions on which ORR requires stakeholders' views

It is a frightening state of affairs that the whole of our "Rail Network" appears to be in the hands of the incompetent - those that are responsible for its control - and the greedy - those that are responsible for its operation. As a result, what should be a dedicated public service is nothing more than a gravy express for both the incompetent and the greedy and nothing highlights this more than ORR's consultation document.

It may only be a hypothetical example. However, in choosing a journey from Leicester to Leeds to illustrate how the revenue "divvy-up" is effected for through/inter-available tickets, someone has merely served to further undermine ORR's credibility.

There are through trains from Leicester to Leeds even if these seem only to be in the evening. For example, East Midlands' weekday 19.32 service arrives at 22.17, so why is this journey used as the example? Certainly, whatever other options there are, the need to interchange at Doncaster is not one, unless there has been a previous interchange at either Peterborough or Grantham or the passenger has had to walk from Newark Castle to Newark Northgate.

If Doncaster is to be an interchange station on the East Coast Main Line option, First Hull Trains would, according to EM, also be a potential carrier, so why no "divvy-up" for that company? Also, if the passenger used the EC option, then an interchange at Selby onto First Trans-Pennine Express is also feasible. Surely there is no vendetta against First Group having its snort in the "divvy-up" trough as well, is there? Then, of course, there are the various West Coast options for the journey from Leicester to Leeds!

Ignoring the through trains from Leicester to Leeds, interchanging at Derby, Nottingham or Sheffield seem to be the sensible options although Chesterfield is also an option for the Nottingham to Leeds Northern service. Whatever the interchanges, buying a walk up ticket at Leicester would cost £42.80. Apart from advance tickets, which could reduce the cost to £19.20, the cheapest split-ticket appears to be £33.50, interchanging at Nottingham, and £36.20, interchanging at Sheffield.

As examples of fares have been taken from services on a specific day, ticket options are strangely varied with not every type of "economy" ticket - advance, saver and supersaver - being offered and, in some cases, only anytime tickets are offered. Also, there are cases of advance tickets costing more than saver fares, up to double in one case and, of course, there are numerous examples of first class tickets costing slightly more, and occasionally less than standard fares. Whatever it is not, our Rail Network is certainly a dog's dinner with the taxpayers and passengers being toothless when it comes to determining both control and operation, even though they pay for it all between them!

As far as ORR's numbered questions are concerned:

1. If not, ORR seems rather irrelevant.
2. Have passengers' needs, let alone changing ones, ever been met? Certainly, as far as ORR appears to be concerned, the needs of retailers, including TOCs, are paramount.
3. What other sectors are similar to the rail sector as regards selling tickets on unlimited - trains having no obvious capacity limit - and limited - planes, coaches, theatres, cinemas, stadiums having obvious capacity limits - buses? Sea/river ferries and buses are the only possible comparators and their operators do not make such a big meal of it, or waste as much money doing so, as ORR appears to be doing.
4. No comment.

5. Most passengers would be surprised, if not shocked, that rail ticket retailers have to have incentives in order to sell tickets to a captive market.
6. Despite being a frequent rail traveller, I had no knowledge of any impartiality obligation, so it cannot be very well notified to passengers. All rail passengers, other than those funded by third parties, want to do is to get to their destination in comfort, within a reasonable timescale and at the least possible cost.

Certainly, if there is a duty of impartiality, this is clearly not met as regards split ticketing since this is something passengers have to initiate themselves. Now being aware of the impartiality obligation, I wonder how adherence to the obligation is enforced and what the sanction is for breaching the obligation - immediate loss of the franchise?

As far as the "cost" of impartiality is concerned, this only arises out of the stupidity of franchising; a system ORR should be doing all in its power to sabotage. In fact, as someone once famously said - if you can't stand the heat, keep out of the kitchen and that would certainly address the "cost" of impartiality.

7. If split-ticketing results in the purchase of time limited tickets then passengers will obviously lose out if delays require the purchase of new tickets for onward connections. Through-ticketing will provide compensation, in some form, for delays. However, the cost benefit of split-ticketing probably justifies its encouragement.

Whilst not split-ticketing, experience shows that purchasing a ticket for a longer journey in order to undertake a shorter journey is cheaper than purchasing a ticket for the shorter journey, despite using the same train e.g. travelling from York to Doncaster using an advance ticket from York to Sheffield on Cross Country. Doing so is probably in breach of the ATOC/NR/DfT cartel but, whether or not it is, it is certainly an extremely good example of the stupidity of the way our railways are run.

Whoever is selling tickets should be under an obligation to ascertain, understand and meet each passenger's needs at the least possible cost to the passenger, whether the sale is made in person or online.

8. What, prey, is a "timetabled, walk-up service"? How is this different to a pre-booked timetabled service or, indeed, any timetabled service? Is there any intention to stop providing timetabled or walk-up services, or both?

In selling both inter-available (why not "universal"?) and through-tickets, retailers must ensure that passengers are aware that split-ticketing may result in a cheaper journey but with the risk of missing connections. Also, inter-available and through-ticket sales must ensure that any imposed restrictions on TOCs and/or route are for the benefit of passengers and not TOCs.

9. Since TfL is in the process of doing away with ticket offices entirely, there cannot be any specific objection to TOCs doing the same provided, of course, there is a suitable alternative method for buying the most suitable ticket for each passenger's needs. If that cannot be done with a machine then the alternative to keeping ticket offices open is to reduce the number of ticket "offers" and allowing no-penalty on-train ticket purchases.
10. TOCs already make enough out of passengers and taxpayers not to have ORR suggesting that they be able to charge for issuing tickets. Next ORR will be suggesting TOCs charge for providing standing space on station platforms, or the like!
11. In short, not a lot. The only way of improving governance is by reverting to the state pre-privatisation.

12. The industry rules, like governance, are a creature of necessity resulting from privatisation. Again the problem could easily be resolved by reverting to the pre-privatisation state.
13. The savings from not having third party retailers justifies their removal from the gravy train.
14. What is ORR's concern with innovation unless it produces cheaper fares?
15. In both respects, frighteningly.
16. To repeat, the sooner franchising is abolished, the better the needs of both passengers and taxpayers alike will be served. Asking respondents to "consider the extent to which the incentives, obligations, governance, rules, processes and systems in place", is a clear indication that the needs of both passengers and taxpayers are secondary to the interests of both the incompetent and the greedy.
17. None, to be honest since abolishing franchising is the only way forward for passengers and taxpayers alike.
18. There appears to be no reference to discount cards, such as Network Cards, being made available over the whole network. Similarly, initiatives such as the ScotRail 55 Club should be considered by all TOCs. Of course, the proposed new ScotRail franchise proposes a number of ticketing innovations, including "ScotRail 50" which should require close scrutiny by ORR.

Another area where TOCs are behind the times is in the provision of free, effective and reliable Wi-Fi on both stations and trains. Some TOCs do, but others either do not and/or charge, and charge excessively, for a poor service. One advantage of having free access would enable the sale of tickets on station platforms without reliance on TVMs and ticket offices. On-train sales would also help ensure passengers were in possession of the necessary ticket, as well as enabling them to buy tickets for onward journeys, especially when more accurate ETAs may be available.

Finally, what is point of having a glossary if it omits definitions of "TPIL", "ISL" and "ITX" but includes such as "OAO" which is defined in paragraph 3.8 of ORR's document?

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