

21 November 2014

Phillip Willcox
Competition and Consumer Policy Team
Office of Rail Regulation
1 Kemble St
London
WC2B 4AN

Office of Rail Regulation Consultation Towards a code of practice on retail information

Dear Mr Willcox,

I am pleased to write on behalf of Keolis UK in reply to your consultation document dated September 2014. Our responses are provided in italics overleaf.

As we consider customer outcomes to be the most important factor, we believe that the basic objective of this review should be ensuring consumers can buy their ticket easily and with full confidence that they've selected the most suitable option irrespective of the channel.

It is clear from successive waves of research conducted by Passenger Focus, the ORR and other stakeholders that passengers still find some aspect of ticket purchase confusing. There is obviously room for improvement which train companies have accepted for some time, something that is reflected in the range of both industry and TOC level initiatives designed to improve information provision and ticket retailing.

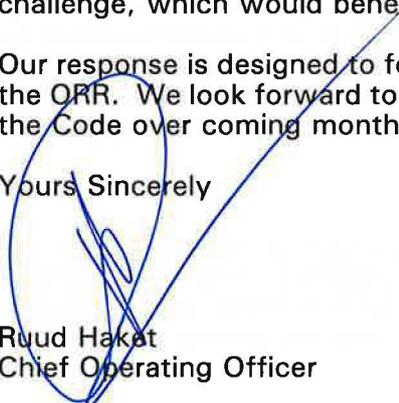
We believe the Code will be a welcome and positive contribution to these efforts by providing a set of clear principles that the industry will work towards achieving, as well as creating more detailed guidance on what constitutes good and bad practice.

The main challenges associated with implementing the Code are around the practicality of providing information through some retail channels, in particular station ticket offices, on train and via Ticket Vending Machines ('TVMs') in particular. Mitigation for these challenges include making the limitations associated with a specific point of sale clear to customers and sign posting them towards alternative sources such as the internet or printed material if more detail is desired.

There are also limitations associated with industry data, although this is the subject of concerted industry effort at the moment. However, routeing is a specific area of challenge, which would benefit from reform of the current regulatory framework.

Our response is designed to form the basis for further detailed engagement between with the ORR. We look forward to working with the ORR and other stakeholders in completing the Code over coming months.

Yours Sincerely


Ruud Hakat
Chief Operating Officer

Question 1:

We generally agree that the types of information described would meet customer's information needs and allow them to make a fully informed decision as to which rail ticket is the most appropriate for their journey.

Question 2:

The Code is clearly focused on ticket purchase and as such we do not believe that there are any material omissions in the list proposed.

Question 3:

There may be practical reasons which limit the amount of information provided. This limitation most obviously applies to sales through staffed ticket offices, on train sales and Ticket Vending Machines ('TVMs').

Clearly it is more difficult for a staff member to provide the comprehensive list of information set out in the consultation document, particularly in a busy ticket office where there may be a queue of passengers waiting to purchase tickets and complete their transaction quickly to catch their train.

Time constraints also exist for on train sales, where staff have a range of other customer care and safety duties (for example opening and closing the doors); a constraint exacerbated by the more limited information that on train staff have access to (either through hand held devices or printed material) and the practical limitations on them using it on a moving train, often with frequent station stops.

As far as TVMs are concerned, there is limited space on the display screen to provide information and a clear need to focus on the most important information required by customers. This is particularly so at busy stations where there may well again be pressure on the customer to complete the transaction quickly. However as outlined on Question 8 below some good progress is being made.

The quality of base data provided to current retail devices does not allow clear information to be provided to customers. There are examples of this in terms of information on restrictions (Off peak ticket restrictions in particular), routing information and the use of industry jargon. This is a recognised problem and is the subject of much ongoing work by the industry. However there are challenges in resolving some of the problems.

Routing in particular presents severe difficulties, for example the commonplace 'any permitted' route causes particularly difficult problems. The combination of 'any permitted' and 'London stations' (which allows travel to a range of London terminal or other stations) can result in dozens of valid routes existing for a straightforward ticket to London. In such circumstances (which are relatively common) it is impossible to provide customers with comprehensive information, either verbally or even visually using graphic display tools on TVMs or the internet.

Question 4

Our response to question three highlighted that there are practical limitations to the amount of information that can be provided via some retail channels. The most obvious mitigations for this are to ensure that customers are made aware of these limitations and signposted towards fuller sources of information such as the internet, printed documents, staff and help points.

Question 5

We strongly support ORR's proposed approach of making the Code 'principles' based.

The four principles articulated provide an 'output' based framework for better informing customers, but it also allows scope for a variety of delivery approaches, freedom for innovation and flexibility to accommodate change (whether legal, technological or in terms of customer need).

Question 6:

We believe that the four principles provide a clear and simple but comprehensive framework for the provision of information to customers and as such have no additional principles to suggest.

Question 7:

We have highlighted relevant issues in our responses to questions three and four.

Question 8:

Keolis strongly encourages our joint venture train operators to create and share best practice. As our reply highlights, Ticket Vending Machines are an especially problematic area and we would like to highlight some best practice from our Southern joint venture.

Southern has made or is planning a number of enhancements to improve the TVM user experience that begin to address the Code's requirements, which include:

- o A scrolling message along the top of ticket vending machines to provide additional information or alerts about events or disruption which could affect travel, tailored for each station.
- o An option to view the "next five trains" to their destination.
- o The ability to buy tickets for journeys starting from a different station.
- o Highlighting the services available at TVMs with large signage at point of sale, whilst directing customers towards more comprehensive sources of information such as the internet and National Rail where more detailed help can be found.

We believe this provides a good model for other train companies to learn from and demonstrates Keolis' willingness to help our customers feel secure in the knowledge they have purchased the most suitable ticket for their needs.