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Andrew Eyles.
Office of Rail Regulation,
One Kemble Street,
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WC2B 4AN.

13th September 2012

Dear Andrew,

**GB Railfreight response to Office of Rail Regulation Consultation
on The Formalisation of the Rail Delivery Group:**

GB Railfreight Ltd. is pleased to respond to this consultation and makes the following points:

GB Railfreight notes the proposal that RDG be led by a board of directors drawn from Network Rail and active GB train operator owning groups (its Leadership Members). Although GB Railfreight's owning group, Europorte Channel, has a turnover in excess of £100M, it does not propose to apply for leadership membership at the present time. It may, however, apply for Leadership Membership in the future.

Response to consultation questions:

Question 1: GB Railfreight believes that the purpose and role of the RDG, as described in paragraphs 2.3 – 2.5, will enable it to drive the necessary changes and improvements as envisaged by the Rail Value for Money Study.

Question 2: GB Railfreight is content with the proposed structure of the RDG board as set out in this document.

Question 3: GB Railfreight would want to see full transparency and regular and detailed engagement with other freight operating companies not directly elected to the Board. This could include, but not be limited to, representation at smaller working groups involved with further discussion and action of individual items and also regular cross-FOC meetings.

Question 4: GB Railfreight is content for the ORR to propose a modification to Annex B.

Question 5: GB Railfreight is in agreement with the proposed voting and quorum proposals.

Question 6: It's vital that compliance with competition law is met at all stages.

Question 7: GB Railfreight is content with the funding proposals as proposed.

As noted from the above answers, GB Railfreight is, broadly, content for the proposed formalisation of the Rail Delivery Group to proceed as described in the consultation document.

Yours sincerely,

Ian Kapur.
National Access Manager.