

From: James Peter
To: Abigail Grenfell, ORR
Sent: Thu 05/05/2011 17:42
Subject: Re: Amending licences to give passengers the information they need to plan and make journeys - a consultation

Dear ORR

Here is my personal response to the consultation on:

Amending licences to give passengers the information they need to plan and make journeys - a consultation

My comments below are in blue after the relevant sections.

Many Thanks.

24. Station operators have a key supporting role in passing information on to passengers through their staff and customer information systems. In most cases the station operator is also a train operator, but not all stations are managed by train operators (Network Rail managed stations, for example). Do you agree the split of responsibilities described is sensible? Are there any other changes in the way the industry handles information for passengers that would complement new licence obligations and help the industry deliver the needed improvements?

Station licences

32. For station operators we propose a new short obligation to cooperate with train operators so far as is reasonably necessary to enable them to meet their obligations to provide information to passengers . This is necessary to ensure that those station operators who do not also have a passenger licence (such as Network Rail) are also made responsible for passing on relevant information to passengers.

4.11 The licence holder shall as soon as reasonably practicable:

- (a) provide to the holders of passenger and station licences; and
- (b) provide to all timetable information providers on request reasonable access to

appropriate, accurate and timely information to enable each on request to provide passengers with all relevant information to plan their journeys including, so far as reasonably practicable, the fare or fares and any restrictions applicable.

Regarding the above three, I have personally found that if a station is not staffed by staff from the same operator that is being enquired about during disruption, they either do not know what is going on but do not care as it is not

their train operator. There could be radical change and have all station staff effectively working for the "National Rail" brand thus no connection with any one operator. Also, the systems used by train operators needs to be assessed; are train operators adequately communicating with staff employed by other operators? Each company having its own systems would not help.

Access to information for enquiry services

2.9 The licence holder shall grant access to information it holds on the planned [and actual] movement of trains on its network to persons providing or seeking to provide credible enquiry services relating to the operation of railway passenger services on the licence holder's network. The licence holder shall grant access to such information as these persons may reasonably require for the proper carrying out of their operations. The licence holder shall grant access to the information on reasonable terms (including the prices charged, means of access and confidentiality).

The above appears in the Network Rail license condition proposal. There are no similar conditions for ATOC/National Rail Enquiries which is amazing considering the role they play in information aggregation and dissemination. ATOC own the real time train data system 'Darwin'/LDB (Live Departure Boards) and access to this data is controlled and licensed by ATOC. ATOC have been accused of not fairly licensing this data, unfairly charging for access to it (ATOC is a commercial organisation) and ultimately stifles independent developer innovation and affects passenger choice. This system should maybe transfer to Network Rail or the DfT? Transport for London has implemented open data for developers with no charge; National Rail should be the same. Reports on ATOC and Darwin (lack of) open data can be read here:

<http://www.guardian.co.uk/technology/blog/2010/dec/03/national-rail-enquiries-data-charging-developer-protests>

<http://mocko.org.uk/b/2010/12/02/national-rail-enquiries-license-application-refused-my-app-still-dead/>

<http://data.gov.uk/blog/transparency-board-minutes-8th-february-2011>

<http://www.wired.co.uk/news/archive/2010-11/03/railtrack-open-data-apps>

ATOC has only got a COP for third party open data and based on the above reports; this is insufficient.