

Mr Mike Lunan

Before making my formal Response it is worth pointing out that it would be better if the Strategic Objectives listed on p7 in both the text and the pie chart were in the same (correct) order that they appear on p4.

Response

1 I am responding to this Consultation in my capacity as the Passenger Representative on ORR's Rail Industry Health & Safety Advisory Committee. From 1998 until it was abolished in 2005 I was a member (from 2000 Convener) of the Rail Passengers Committee for Scotland, and as such a member of the Rail Passengers Council from 2005. During most of this period I was Chairman of the RPC Safety Taskforce.

2 I am confining my remarks to the section entitled "What will be different in 2013/14" on pp 5 and 6 of the Consultation Document. In general I endorse the wider aims of the CD as a whole.

3 The second bullet point (Giving customers timely information ...) seems to conflate three separate issues which, since the methods of dealing with them are different, should in my view be set out separately. They are (1) the idea that passengers (my preferred term) should be given full ticket information whenever and wherever they seek this, either online or at a station, and if at a station either to a booking clerk face-to-face or using a ticket machine. Too often the range of tickets offered is incomplete, and is sometimes woefully inadequate. (2) information at these times should include the fact (if relevant) that cheaper tickets are not yet available and that they will go on sale on such-and-such a date. (3) the wholly distinct area of information at the time of travel, especially if there is disruption, needs to be further improved. I deal with these in turn.

4 When an intending passenger seeks information about a journey full information should be provided by all outlets providing this information. At present many web sites assume that the fastest journey is being sought - the question "do you wish to see the fastest journey, or the cheapest journey, or both?" should be the first question asked in any enquiry. Only at that point can choices be satisfactorily narrowed. If Advance tickets for the intended journey are not yet on sale a screen should alert the passenger to this, with details of when they will be available BEFORE any attempt to buy an expensive ticket is allowed. Only when a positive answer (do you wish to go ahead despite this?) is forthcoming should it be possible to buy a full-price ticket. Clearly it is not within ORR's gift to make this happen, but instruction should be given to all TOCs and other ticket-selling bodies that ORR expects substantial improvements in this direction within the period under discussion. Furthermore it should be possible to buy even an individual TOC's best offer tickets from any source, not merely that TOCs web site. Many intending passengers will be unaware of the name of their service provider, and should not incur a price penalty in consequence. TOCs may argue that there is a loyalty element; there is equally a swings-and-roundabouts one.

5 With the widespread availability of social networking media there have been huge strides in the willingness of TOCs to communicate with passengers on the day of travel. This normally works well, and "more of the same" is all that is required. However at times of disruption the provision of timely, and more important accurate, information still leaves a

great deal to be desired. I would expect to see continued effort made by all TOCs to improve in this area - probably the one single greatest cause of grief among displeased passengers.

6 The slippery concept of Value for Money (VfM) is mentioned in the fourth of the second clutch of bullet points on p5. As a professional familiar with statistics I view attempts to measure, and thus to target, VfM with some misgiving. Even McNulty shied away - as have all others - from defining it except in the most general terms (ie. higher is good). I accept that if ORR is tasked with any involvement with VfM it has to make an attempt to deal with the problem seriously, but I find it hard to set out what the first steps might be. Benchmarking with other railways is sometimes seen as a good start, but is it seriously intended that ORR should investigate the degrees of satisfaction felt by commuters into Berlin, or by rural rail users in Spain? For surely that's what benchmarking means. Since we cannot know how these people come to their feelings (any more that we can for GB rail users) the utility of such benchmarking seems dubious. Equally with benchmarking in other industries. I think my gas bill is too high, but my measure of satisfaction with the gas company is whether gas is available when I wish to boil a kettle. Running a railway is a bit more complicated than pushing gas down a pipe, not least because there are vastly more opportunities for things to go wrong, so a subjective measure of VfM is likely to contain a vast number of unquantifiable (and indeed unknowable) variables. It would be very instructive to quiz the same group of say 100 passengers about their VfM feelings on 20 different occasions, chosen to include days of cold weather, rain, Mondays etc, when people are generally more brownd off with life in general. I would predict that the findings would be so widely variable as to cast doubt for ever on the utility of chasing VfM. However we aren't there yet so I acknowledge that an effort must be made. Is there any desktop exercise anywhere which might shed light on how to grasp the slippery concept of VfM?

7 In the first bp on p6 you say that ORR will "explain how the £4bn ... is used". But this is done already by a variety of bits of the industry. The serious newspapers and the trade press cover this thoroughly, and usually in a way favourable to the industry. That some newspapers, editors and proprietors have it in for the railway is neither new nor news. Explaining something to someone who doesn't want to know is a waste of time. Those who need to know do know; those who aren't interested will not become interested. One should not lose sleep about a malfunctioning horse/water interface.

8 My final point concerns the second bp in the final clutch on p6. I am in no doubt that those at the top of the industry in ORR, Network Rail and the TOCs, all accept that the passenger should be "at the centre of the industry". That it be set out and proclaimed at every opportunity is a Good Thing. The problems lie lower down within TOCs, particularly where a passenger comes into contact with Authority. This usually happens when a passenger has the "wrong" ticket. Naturally if the points I raised earlier about ticket purchasing are addressed this will be less likely to happen, but it will never disappear. It seems far too often to be the case that the presumption of innocence is not applied. A passenger with the wrong ticket has at least made an attempt to buy a ticket, so cannot seriously be treated as someone trying to defraud the TOC. Revenue protection staff should be instructed to act accordingly. Only when there is no ticket offered would it be reasonable to think that an attempt to defraud may be taking place, and even then there will be mitigating circumstances. TOCs encounter a large amount of reputational risk when these altercations become known, and with the spread of tweeting and mobile phone cameras this will only get worse. Surely it is within ORR's power to tell TOCs that if an excess fare is to be paid then only the excess should be charged? 99% of passengers will be unaware of the ORCATS reasons why this doesn't happen already.

Swings and roundabouts again - the likely losses to a TOC will tend to be offset by the likely gains, and the reputational damage will be reduced, perhaps dramatically. The value of this reputational risk is not, of course, something which the great variety of railway measuring staff can capture. If I have a £25 ticket and ought to have a £60 ticket I will be far more unhappy coughing up £60 than I would be coughing up £35. The TOCs argument that I can claim back the £25 is specious - it's a nuisance and often there is a £10 handling deduction. One hesitates to use words like daylight robbery in a Consultation Response, but it is unlikely that journalists on a tabloid newspaper would be so circumspect.

9 I strongly support the overall message of the document. I hope that my observations will enable it to be turned from a 97% success to a 100% one.

Mike Lunan
15 Castle Gardens
Barrock Street
Thurso KW14 7GZ

Passenger Representative, RIHSAC