

Tuesday, 3 May 2011

Dear Abigail,

**Response to consultation on amending licences to give passengers the information they need to plan and make journeys**

We welcome the interest that the ORR is showing in the very important issue of customer information during disruption. We feel that the amendments proposed go most but not all of the way to addressing the issues that emerge from the customer experience. The analysis is biased towards timetables and amended timetables (and communication of information about them). A bigger issue is passenger information about 'in the moment' handling of disruption. These disruption incidents often do not lead to re-timetabling exercises but more to service restoration activities by controls and front-line staff. We do not feel the drafting sufficiently covers this substantial body of activity. We make the following suggestions in response to the questions raised in the consultation.

**Question 3- Split of responsibilities**

Answer: Yes, though we feel it is important to reflect the dynamic of information flows during disruption. See comments below.

**Question 5- Proposed licence drafting**

**Paragraph 32 (Station licences)**

The use of the word 'cooperate' could imply a passive/compliant role in the provision of information during disruption. Yet, stations are often gatherers of new information and should also use their resources to 'pull' information from central sources in order to meet passenger demand for information. We would suggest that this dynamic is not missed in the drafting of this obligation, perhaps by use of the word 'collaborate' or 'coordinate' instead of 'cooperate'.

**Annex a (Operator licences)**

4.1 Purpose. As well as 'plan and make' journeys it should also mention 'completing' journeys (to avoid any doubt that this is about provision of information for disruption that occurs to passengers' mid-journey).

4.11 Similar to 4.1 above 'plan' should also include 'make and complete' disrupted journeys.

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## **Annex b (Network Licence)**

2.4 Similar to the above rationale we suggest 'and complete' to be added to scope of journeys.

Additionally, Network Rail is often the key to the provision of information that will become the basis of an accurate and informed communications from train operators to their passengers. They should actively engage with train operators as information becomes apparent. Again we feel this dynamic should be reflected in a more active word than 'cooperation' that could be interpreted as being passive.

A handwritten signature in blue ink, appearing to read "R. Brown".

**Richard Brown**  
**Managing Director**