From: Peter Rush

To: Abigail Grenfell, ORR Sent: Fri 10/06/2011 22:01

Subject: Consultation on information for planning and making journeys

My responses are:

Q1: Yes Q2: Yes Q3: Yes

Q4: All information provide to passengers in whatever form should be presented with the time it was originated and the organisation that originated it. Then it is visible to passengers how up to date the information is, and hence how accurate it is likely to be.

Q5: Codes of practice are often useless at just the time when compliance is required, they are likely to be ignored and any action over failure to comply is retrospective, provides time for excuses to be developed, and may have perverse impact (e.g. a 'fine' may result in fares rising more than they otherwise would at the next fare review to recover lost income). So, the threshold to be met for failing to comply with the licence should be fairly low (to encourage compliance at all times), be publically available in a form that the public can readily understand, the penalties should be high (ditto) and include the possibility of fare freezes and refunds in excess of fare paid as compensation. Compliance with code of practice should be a licence condition for all operators, and breach of code on more than x occasions in y years should be punishable by mandatory loss of licence (no excuses accepted). There should be requirement for all information to be specific about the cause in the event of disruption - we don't need to be told that we are subject to delay when stuck on a train that hasn't moved for 15 mins or waiting for a train shown to be on time when it is already 15 mins overdue, we know this - what we need to know is (a) why [this needs to be the truth, too often conflicting reasons are given by Network Rail and the train operator] (b) how long for [estimate, updated every 15mins max] (c) what action is being taken about connections (d) what should people with specific medical needs who are significantly impacted do (e) for those at stations, what alternative routes to major destinations are available.

It should also require that in the event of significant disruption, all ticket restrictions on permitted operators/routes/times of travel/class of travel should be voided automatically - only one thing matters at such times

- get the customers to destination as fast as possible, keeping them informed en-route.

Finally, because modern signalling systems have a much wider area covered, so failure of such system from any cause will result in much greater disruption than say 40 yrs ago, all infrastructure providers (i.e. Network Rail) and train operators should be required to jointly prepare plans for prompt incident management from a passenger perspective when signalling systems fail, covering each modern signalling centre (broken down into sub-areas as required). These plans should include for the prompt evacuation of passengers to the nearest station if delay is forecast to be, or actually exists

for over 60 mins, or equivalent actions such as alternative means for movement of trains, at slow speed if required, through the affected area, rather than just halting everything until the issue is fixed ,and always having sufficient staff on duty or on call at 1hr notice at most to implement the plan. Q6: all operators of passenger and freight services, and providers of associated services (infrastructure and customer information systems) Q7: How compliance will be assessed (in a form that the general public can understand) without reading through technical jargon or referencing complex, legally drafted licence conditions or contracts), and timescales for improvements to be rolled out - personally when experience disruption, there is no evidence that actions supposedly taken since early 2010 have produced any improvement in passenger information, especially to those on trains or at stations. There should be a published timescale for implementation of all of this, May 2012 is reasonable considering how long the issue has supposedly been looked at.

Regards,

Peter Rush