

Transport Salaried Staffs' Association

Walkden House, 10 Melton Street, London NW1 2EJ

t 020 7387 2101

f 020 7383 0656

e enquiries@tssa.org.uk

Siobhán Carty
Project Coordinator
Office of Rail Regulation
Head Office
One Kemble Street
LONDON WC2B 4AN

20th March 2014

Dear Ms Carty,

Retail market review of selling tickets - call for evidence

Thank you for your letter of 19th February, set out below are TSSA's comments:

1) We are deeply sceptical about the need for this review. The structure of the industry is already far too complicated adding very significantly to costs with too much money being lost to the myriad of vested (private sector) interests as a consequence. We are concerned that if even more organisations become involved in retailing tickets, this will add to the complexity and result in even more money being lost to outside private sector companies whose sole interest is to maximise profit. We consider this would benefit neither passengers nor the taxpayer.

2) Privatisation of the railways was meant to introduce competition into the industry that would, amongst other things, bring about lower fares. The reality is that it has done neither, failing miserably on both counts. The industry is by and large oligopolistic in nature with the 'usual suspects' bidding for and being awarded franchises until the going gets tough when there is a tendency to 'bail out'. Given that the public's main concern is the high cost of fares - the highest in Europe - it seems to us fairly pointless to undertake a review that does not address this - 'the big question'. Indeed, not addressing this question renders it very limited in scope and ambition - perhaps not the best use of ORR's time and resources. Any benefits that might accrue to passengers arising out of the sorts of things in this review are likely to be insignificant compared to the sorts of efficiencies that could be realised if the industry was returned to public ownership and run in the public interest. If ORR is truly concerned in making sure passengers get the best deal, this is the sort of radical review it should be pressing for, not tinkering with a structure that is beyond repair.

3) If, however, ORR is going to proceed with this review we feel strongly that it should look in detail at the following areas also:

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General Secretary Manuel Cortes



(i) the extent to which train operating companies are meeting their Schedule 17 obligations in terms of ticket office staffing levels and opening times;

(ii) the impact of (excessive) queuing times on ticket sales at ticket offices;

(iii) the range of product availability at ticket offices that prevent them from maximising revenue. For example, ticket offices sell annual senior railcards, but the three-year card can only be purchased on-line. It should also be possible for ticket offices to offer tickets on the same terms as other channels - these should not be available only to those who have the time, ability and IT access;

(iv) ticket offices being put on a level playing field with other channels of ticket sales and being able to match these on price, including the ability to match the best on-line deals, for example;

(v) ticket offices being credited (financially) with help and advice given on ticketing that might be purchased through other channels - this should include credit for things like rectifying problems arising from using ticket vending machines and on-line purchases;

(vi) the extent to which ticket offices deal with problems created by tickets purchased by passengers through other sales channels and how they may be credited (financially) for this work undertaken;

(vii) the extent to which ticket offices are currently able to retail existing smart tickets - e.g. Oyster cards in Greater London. It is our understanding, for example, that the South West Trains ticket office at Richmond does not currently handle Oyster card transactions even though this station is also a terminus for London Underground District Line and London Overground services; and

(viii) equality impact assessment of the use of the various sales channels passengers use to buy tickets and the extent to which for example, disabled and older people, may be losing out on the opportunity to access the best on-line deals.

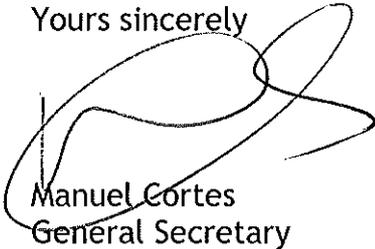
4) We consider the stakeholder workshop scheduled for 8th May is insufficient. TSSA considers that the process would benefit from ORR having the opportunity to discuss the matter with trade union officials and (lay) staff representatives who deal with ticketing and ticket sales issues and should organise and facilitate a suitable event. Consideration should also be given to organising events for other groups to ascertain the views of disabled and older passengers for example.

5) We consider that it is imperative for any initiatives and developments arising from this review that impact on the ticket market do not undermine or seek to circumvent existing arrangements that are valued by passengers.

This must include the continued opportunity to buy tickets at staffed ticket offices at least at the existing level of provision.

I would urge the ORR to give serious consideration to the matters alluded to above in carrying out its review.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Manuel Cortes', written over a printed name and title. The signature is fluid and cursive, with a large loop at the end.

Manuel Cortes
General Secretary

