

7 June 2010

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Dear Stefano,

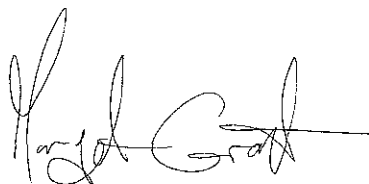
**The Railways and Guided Transport (Miscellaneous Amendments) Regulations 2010**

Thank you for the opportunity to comment upon the review of the proposed regulations legislation. This letter draws together the response of all FirstGroup's rail operations, including First ScotRail, First TransPennine Express, First Capital Connect, First Great Western, and Hull Trains.

I am pleased to say that we are content with the proposals and have no further comments. For the sake of completeness I have formally responded to the questions on a separate attached sheet, however all responses support your proposals.

This letter and our response to your questions do not contain any responses we wish to remain confidential and we are happy for them to be published on the ORR website.

Yours sincerely



Mary Grant  
Managing Director, Rail

Answers to specific questions on The Railways and Guided Transport (Miscellaneous Amendments) Regulations 2010.

**Question 1:** Do you agree that we should not change the current position on the exclusions from ROGS? If you do not agree, please explain why.

*Yes we agree.*

**Question 2:** Do you know of any circumstances in which vehicles registered and maintained according to the laws of a non-EU Member State enter Great Britain? If so, please explain.

*No we do not.*

**Question 3:** Do you know of any circumstances in which vehicles with track gauges other than standard gauge enters Great Britain? If so, please explain.

*No we do not.*

**Question 4:** Do you know of any circumstances in which military equipment or special transport will require an ad hoc permit to be delivered prior to being in service? If so, please explain.

*No we do not.*

**Question 5:** Do you know of any circumstances in which those vehicles that are excluded from the mainline railway, as defined in ROGS, may require an ad hoc permit to be delivered prior to being placed in service in Great Britain? If so, please explain.

*No we do not.*

**Question 6:** Do you agree that RAIB should be the investigating body for accidents on tramways in Scotland?

*Not a matter we are involved in so we would not wish to comment.*

**Question 7:** Do you have any comments on the new definitions? If you have any objections, please could you explain why and suggest an alternative.

*No we are content that the definitions are accurate.*

**Question 8:** Do you agree that these regulations should contain the date by which domestic vehicles should have been registered in the NVR?

*Yes we agree.*

**Question 9:** Do you have any comments on the proposal to extend the meaning of work to include voluntary work?

*Yes; where volunteers are involved in Safety Critical Work.*

**Question 10:** Do you have any other comments to make in relation to this consultation document?

*No.*