

Phillip Willcox
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

18 February 2015

Code of practice on retail information – consultation on developing a code

Dear Phillip

Our response to this consultation follows involvement in the ORR's workshop on 20 October 2014 outlining the development of code of practice on retail information.

Go-Ahead Group is one of the leading rail and bus operators in the UK. We are a long established operator of rail franchises, and through our Govia subsidiary, which is a joint venture between the Go-Ahead Group (65%) and Keolis (35%). Govia has extensive experience running complex and challenging rail operations. Govia currently runs four major rail franchises: GTR, Southern, Southeastern and London Midland. Govia is the UK's busiest rail operator, currently providing around 35% of all passenger journeys. As a key provider of rail services, we are pleased to provide our views in response to the ORR's retail market review.

This response represents the views of the four Govia-owned Train Operating Companies (TOCs) – GTR, Southern, Southeastern and London Midland - as well as Go-Ahead Group plc.

Govia is an active participant in a range of rail industry groups, including those focussed on retailing. The majority of our views relating to this consultation are represented and summarised in the submission made by the Association of Train Operating Companies (ATOC).

However, we welcome this opportunity to highlight a number of points which are of particular interest to Govia.

Govia supports the development of a 'principles' based code, rather than a prescriptive code, which could limit innovation or any future developments. The code must provide a positive framework for the industry and not become another regulatory tool. If that is achieved then Govia welcomes this initiative.

We support the collaborative approach the ORR are taking to the development of this code and welcome the opportunity to influence its development through our participation in the appropriate Rail Delivery Group and ATOC groups.

Govia Limited

Govia Limited, 1st Floor, 4 Matthew Parker Street, London SW1H 9NP
Telephone 020 7799 8999 www.govia.info

If there are any points raised in this response that you would like to discuss in further please contact me.

Yours sincerely

Richard Evans

Head of Rail Policy