

WORD version extract from email dated 21 November 2014 from Director, Policy and Investigation, London TravelWatch in reply to ORR consultation 'Towards a code of practice on retail information' (September 2014)

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I am responding to your recent consultation on this subject.

**Question 1.** Given the requirements of consumer law and industry specific obligations, do you agree that the types of information highlighted above and in the associated Annex B are the types of information that passengers need when choosing, buying and using rail tickets?

**Answer:** Yes broadly this is correct. This is supported by the research we have carried out on passenger ticket purchasing and journey experiences [http://www.londontravelwatch.org.uk/news/view?id=33&x\[0\]=news/list](http://www.londontravelwatch.org.uk/news/view?id=33&x[0]=news/list). In the case of Oyster / Contactless tickets, we recommended greater transparency of what fares would be charged, as passengers thought that this was unclear. As a result of this TfL produced a poster that is displayed at all London Underground stations setting out in simple terms what fares would be charged and by what means so that passengers could make an informed decision. Our recent report on improving public transport to London's airports [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=3894&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=3894&field=file) on page 12 shows an example of this. We have recommended that TfL should extend this type of poster information to London Overground. We would also like this example to be replicated by National Rail operators throughout the London Travelcard / Oyster / Contactless area. This would also have applications outside of London where zonal fares structures are in operation.

**Question 2.** Are there any other types of information that should be covered by the Code?

**Answer:** This is covered by our answer to Question 1.

**Question 3.** Are there any reasons why any of the information outlined above can't be provided at all, or at certain points of sale?

**Answer:** No

**Question 4.** If there are points of sale which some of the information outlined above can't be provided, or can't be provided in a form that is useful to passengers, what measures do you take to mitigate for this and ensure passengers buying tickets from these points of sale have the information they need to make an informed decision?

**Answer:** This mainly applies at stations where there are no staffed ticket offices or ticket vending machines. In most cases in the London area these have a Permit to Travel (PERTIS) machine which only issues a car park style ticket for a minimum cash amount which then has to be exchanged for a full rail ticket. Surprisingly for London these are still common on some lines. The system is very antiquated and we would prefer that train operators should invest in replacement ticket vending machines that can issue the full range of tickets and potentially give the full range of information.

**Question 5.** Do you agree that a principles' based Code, such as is outlined above, is the best approach? For example, that it would provide the flexibility necessary to address the differing capabilities/uses of different points of sale and/or respond to future developments?

**Answer:** Yes

**Question 6.** Do you agree that the principles outlined above are appropriate to the provision of retail information to passengers? Are there any other principles that you think it would be helpful for the Code to cover?

**Answer:** Yes provided that it can be adapted to a range of delivery systems such as mobile phones and other hand held electronic devices.

**Question 7.** Are there any specific issues retailers are likely to face in complying with these principals, given the different characteristics of different sales channels (e.g. Ticket offices, websites, TVMs) For example from a technological, practical or cost perspective?

**Answer:** Oyster / Contactless payment systems that calculate fares after a journey is completed, face difficult challenges in presenting information in line with this code except by the means of posters as related to in question 1 or by information available by websites.

**Question 8.** Can you provide examples of good and/or bad practice of how retailers already provide information to passengers within this context?

**Answer:** See our response to question 1.

If you have any queries on this response please do not hesitate to contact me.