



**Transport for London**  
Rail and Underground

Phillip Wilcox,  
Competition and Consumer Policy team,  
Office of Rail Regulation,  
One Kemble Street,  
London,  
WC2B 4AN.

Palestra  
London  
SE1 8NJ

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Dear Phillip,

## **Towards a Code of Practice on retail information**

This letter sets out TfL's responses to the questions posed in the ORR's consultation on the proposed Code of Practice for retail information. TfL is content for its responses to be published and shared with third parties.

**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?**

TfL agrees that the types of information covered are appropriate.

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

TfL is not aware of any other type of information that needs to be covered.

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

The information listed can be provided but not necessarily at the point of sale for all items. Information on some of the items that are less immediately pertinent to the journey, such as compensation and refund arrangements, could be provided separately on the internet (for example) with customers being told to consult this media if they require further information. This will help to ensure that transaction times are not extended as a consequence of the Code; this is important as customers buying tickets will wish to minimise their overall travel time.

**4) If there are points of sale at 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 that passengers buying their tickets from these points of sale have the information they need to make an informed decision?**

Refer to the response given to question 3 above. Customers would be directed to the internet (for example) or a call centre to resolve their query if it is less immediately relevant to the journey. This type of response could cover arrangements for compensation and refunds for example.

**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 to respond to future developments?**

TfL considers that the principles based code proposed is an appropriate method for addressing the issues raised.

**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?**

TfL considers that the principles listed are appropriate.

**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, etc.)? For example from a technological, practical or cost perspective?**

TfL's key concern is that the principles are applied in a manner that is proportionate to the value placed on the information by the customers. Ticket transaction times should not be extended as a consequence of an inflexible interpretation of the Code. The information delivered at the point of sale should be focused on that which is most relevant to the journey, covering train times, prices and restrictions on ticket validity.

It should be noted that Smartcards that offer pay as you go functionality, such as Oyster or Contactless Payment Cards, can ensure that customers automatically receive the best price for the journey they are undertaking, with no requirement for the passenger to engage with the complexities of the fare system. This represents the best, most customer friendly approach available to ensuring that the retailing system operates in a fair manner but is only applicable where fare structures are relatively simple (in urban areas, for

example).

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

Refer to the response given to question 7, particularly the commentary on the merits of the Oyster system and the use of Contactless Payment Cards.

Yours sincerely,

**Alan Smart,  
Principal Planner – Rail Development,  
Rail and Underground Transport Planning, Transport for London.**