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Date:
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[By email: ORRretailreview@orr.gsi.gov.uk]

Dear Ms Carty,

Thank you for the opportunity to comment on your consultation on *the potential impacts of regulation and industry arrangements and practices for ticket selling* (3 September 2014). We support in principle the aim to 'enable the market to offer passengers value for money, choice and quality that suits their different needs'.

The Scottish Government seeks to ensure value for money for rail passengers on seamless, integrated journeys, between rail services and across transport modes. Joint research by Passenger Focus and Transport Scotland in June this year showed that simplification of the ticket purchasing process could help to realise the potential for integrated transport in Scotland.

The Scottish Ministers have secured a commitment to investment by the next ScotRail franchisee (from 1 April 2015) to improve the integration of services, including the introduction of smart and integrated ticketing and new kiosks, ticket outlets and ticket vending machines (TVMs) to streamline and improve passengers' experiences.

Transport Scotland considers that there should be a consistent and impartial retail service for passengers, irrespective of whether the ticket is sold by a train operating company or a third-party retailer. Inter-available and through tickets, along with integrated fares, can help to improve passengers' experiences and perceptions of overall rail service integration.

There are a number of improvements that the ticket retail industry can make to improve further the offering for passengers. Industry co-operation can help ensure the passenger can access the most appropriate and best value fare for their journey. The next ScotRail franchisee will introduce a Price Promise Scheme, to help address the problem on some routes of a difference in price between a through and a split ticket for the same journey (with equivalent conditions), however more advanced ticketing systems and better information from retailers will help to ensure passengers are getting the best value fare for the journey they are making at the point of sale.



While retailers may be incentivised to sell higher fares, they should be required to offer the range of fares that are most appropriate for the journey, based on the information provided by the passenger and that available to them via the ticketing system. Where a retail channel provides a limited range of tickets (e.g. current TVMs), passengers should be made aware that other retail channels offer a fuller range of tickets.

Transport Scotland, as the transport authority for Scotland and the franchising authority for ScotRail, will follow the ORR's work on ticket retail with interest. Regulation can be a facilitator to impartiality and innovation, but can also act as a barrier. It is important, therefore, that any conclusions drawn by the ORR in this area are sufficiently flexible to adapt to local and regional markets – for, as the analysis at Chapter 2 of the consultation suggests, a solution fit for the south east of England may not be appropriate in Scotland, or indeed in other areas of Great Britain.

I hope this reply is helpful and I am content for a copy of this letter to be placed on your website.

Yours sincerely,



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