

John Trippier Office of Rail Regulation 1 Kemble Street London WC2B 4AN

Michael Flynn A1 Publishing Ltd [REDACTED]

22<sup>nd</sup> February 2013

Dear John Trippier,

With regard to your document, "Real Time Train Information - a consultation by ORR on the findings from its review", published online at <u>http://www.rail-</u> <u>reg.gov.uk/server/show/ConWebDoc.11063</u> I'd like to share with you my recent experiences with National Rail Enquiries.

I currently make good use of National Rail Enquiries real time train information data. My dealings with NRE during the licence application process and beyond have been fine. Indeed I'm grateful for this 'free' service. The website which uses the data, <u>http://www.stationboard.co.uk/</u>, currently attracts nearly 2,000 unique visitors per day and rising and while I cannot include any advertising on my site I have been allowed a couple of links to some other websites of mine. As part of the licence agreement I must also display a prominent logo with link to the NRE site.

However, I've always been keen to explore further opportunities and to this end have asked NRE on a number of occasions what other services might be available. Unfortunately I've never really had a good response. Oftentimes email queries of mine on this subject went unanswered. Basically what I've been told is the only other service available is for Journey Planning data but only for publication on apps. As I want to publish as a website this wasn't much use to me. The reason I couldn't have a 'website licence' was because of 'third-party contractual arrangements'. I'm sure, but no good to me! I've also asked about other services such as station information, ticket prices, etc. but again nothing much in the way of a response. It seems to me the only actual service available to web publishers like me is the non-commercial real-time train information. And frustratingly I've never even actually been told this.

So when I read online the National Rail Enquiries Code of Practice

(http://www.atoc.org/clientfiles/File/NRE/NRE\_COP.pdf) I was hopeful that things had moved on. I made an application by email for further information. The reply I received was very similar to those I had received before. It was astounding for its brevity, considering the grand claims of the COP. The reply was from Derek Parlour at NRE, whom I've communicated a number of times before regarding the aforementioned licence and queries as above. Maybe he thought he'd already 'answered' my queries and no further explanation was required. The reply was another half-hearted answer and, to be frank, once again just side-stepped many of my queries. I followed this up, as suggested in the COP, with a letter to Chris Scoggins, NRE's Chief Executive. I sent this a month ago but have yet to receive any reply. Please find attached my letter to Mr Scoggins. Included within this attachment is the email application.

For whatever reason, it seems National Rail Enquiries doesn't want to facilitate third party developers such as me. Maybe this is justifiable, maybe not. But to publish the Code of Practice as is simply disingenuous.

What I'd really like to know is what actual services are there? The Code of Practice says, along with live departure and arrival data, there is available "journey planning as well as alerting services and disruptions". Need it be so vague? Where can I see a pricelist? What restrictions



are there? At a minimum I think if journey planning data is not available for websites this should be mentioned. And what about the detailed reply I was promised?

I want to develop informational websites for the public but, of course, without the data this isn't really possible. I understand your (and my) desire for National Rail Enquiries to 'play ball' but whichever way you look at it they are a private company and I have my doubts. I believe ultimately the solution lies outwith National Rail Enquiries.

Yours faithfully,

Michael Flynn,

Managing Director, A1 Publishing Ltd.



Chris Scoggins Chief Executive National Rail Enquiries 3rd Floor 40 Bernard Street London WC1N 1BY Michael Flynn A1 Publishing Ltd 28 Twyford House Elwood Street LONDON N5 1EJ

23rd January 2013

Please note new address as from 2013-01-23; A1 Publishing Ltd, 6d The Oaks, SUNDERLAND, SR2 8EX

Dear Chris Scoggins,

On Sunday I read with interest the online document '**National Rail Enquiries – Real Time Systems Code of Practice**' and duly made first enquiries towards an application by email as requested (please see next page). The following morning I received this reply;

----- Original Message -----From: Parlour, Derek To: mike@a1publishing.com Sent: Monday, January 21, 2013 9:50 AM Subject: RE: real-time journey planning services licence application

Hi Michael, Unfortunately we are unable to offer the Real Time Journey Planner as a service to 3<sup>rd</sup> parties due to contractual restrictions.

Sorry about that.

Regards Derek

With respect to your 'Code of Practice' I'd be grateful if you could let me know whether you consider this a satisfactory response.

Yours faithfully,

Michael Flynn, Managing Director



## Email to NRELICENSING@ATOC.ORG (sent Sunday 2012/01/20)

Dear Sir or Madam,

Reagarding the document, NATIONAL RAIL ENQUIRIES - REAL TIME SYSTEMS CODE OF PRACTICE, found on the internet at http://www.atoc.org/clientfiles/File/NRE/NRE\_COP.pdf, I would like to apply for licences for your real-time journey planning services and to extend a licence I currently hold for your live departures and arrivals information. I currently have a 'non-commercial' licence to access your Darwin Web Service for my website Stationboard.co.uk.

My Stationboard website has been online since shortly after the licence was granted in July, 2011 and has steadily been increasing in popularity. It currently attracts over a thousand unique visitors per day. Average duration on the website is just under 3 minutes and over a quarter of these are returning visitors. The website is certainly of benefit to passengers. I believe also to ATOC. There are links to the operating train company for each journey: helpful both practically and regards search engine ranking.

A1 Publishing Ltd, of which I'm the Director, is the commercial company operating the website. It also actively maintains and develops a number of other travel information websites; http://www.rail-time.co.uk/, http://www.train-stations.co.uk/ and http://www.tubestation.co.uk/. These websites do include advertising and this is the company's main source of revenue, currently about £750 per month. The past 3 months, the income was higher, around £2,000 per month, but dropped significantly, hopefully only temporarily, following a recent recode and redesign to Rail-Time to allow for mobile handset and tablet use. This 'improvement' to the website was primarily to increase it's usefulness to the rail travelling public. I believe ultimately it will benefit the company by way of increased return and search engine visitors. The company's longer term plans are to continue developing and improving its travel information websites hence the application for your services.

I'd also like to redesign my Stationboard website to include a mobile version. For this I would want to serve the site from the mobile address, ie. http://m.stationboard.co.uk/. Would I need separate SOAP tokens for this?

As per the application process detailed in the document I have attached a copy of last years accounts for A1 Publishing Ltd. Please let me know if you require any further information.

I'd be grateful if you could let me know whether further licences to use your services might be granted.

Regards, Michael Flynn, Director, A1 Publishing Ltd.