

Dear Mr Mills,

I am the Operations Director of the Main Line Steam Operators Association (MSLOA). All of the owners of current and many former main line certificated steam locomotives are members of our organisation. I maintain a database of Steam performance which now goes back 16 years and prepare summaries for our AGM early in each year. Loco owners submit detailed logs of performance which then populates the database.

I believe I am in a unique position as no other organisation maintains a complete picture of main line steam performance. I attach both detailed report and annual summaries updated to end of 2012.

On the Consultation we respond to Q44 favouring option A. On Q45 our experience is that it is difficult or impossible to obtain Insurance at an affordable price unless data is available to allow insurers to have some means of quantifying risk. Our members carry insurance for many issues including mechanical breakdown, obtained after supplying the data on performance which I hold. Unless Network Rail, as the only organisation holding data on the actual performance of all Charter Trains, steam diesel and electric, can supply this data to Insurers in order that they can assess the risk against which they can insure, this would be an impossible process.

On the more general steam Charter market this is remaining amazingly stable, against the recession, with DBS i/r problems being the main cause of the dip in trains run in 2012, with a record mileage achieved.

My detailed analysis of individual runs leads me to make the following observations

1 Steam Charters are frequently regulated by NR to follow late running scheduled services, often with knock on delays to the charter.

2 Steam Charters frequently recover delays incurred from other scheduled services, poor NR regulation and operating cock-ups.

3. Franchised TOCs have a Performance Regime which has Penalties and Rewards. Charters have no scope to earn rewards for good performance.

4. NR Train Planning is somewhat haphazard for steam charters.e.g.

Locomotives with a 60mph limit are often timed to achieve point-to- point times requiring an average speed in excess of 60mph. Charter Operators need to have the ability to challenge delays incurred by NR planning failures.

5. The Steam miles per casualty figure is significantly better than that achieved by many classes of diesels operated by Franchised Operators. There is no factual basis for any claims of "unreliable steam charters".

David McIntosh. Operations Director MSLOA.