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Chairman: Cllr Russell Imrie Partnership Director: Alex Macaulay

19 Oct 2012

Our Ref: SES – Rail (ORR)

Philip Willcox
Office of Rail Regulation
1 Kemble Street
LONDON WC2B 4AN

Dear Mr Willcox,

ORR's Approach to Transparency – a consultation Response by SEStran

SEStran (South East Scotland Transport Partnership) is the statutory Transport Partnership covering the eight Local Authorities that largely make up the Edinburgh travel to work area, namely City of Edinburgh, Clackmannanshire, East Lothian, Falkirk, Fife, Midlothian, Scottish Borders and West Lothian Councils.

Rail plays an important role in the SEStran area. Rail enjoys an increasing share of the commuting market into Edinburgh. The City and its environs is also the most important financial and tourist centre in the UK outside London so longer distance rail travel is also an important element for the well being of the SEStran area, both for business and leisure purposes.

SEStran therefore welcomes this opportunity to respond the ORR's consultation on Transparency.

In general, SEStran is fully supportive of the work undertaken by ORR to enhance transparency within the industry (including the Government) and, most importantly, between the industry and the general public.

In financial terms, it is important that clear and relatively easily understood information on investments and level of financial support is provided so that the public will be able to judge if they consider expenditure by the Government to be 'value for money'

We would in particular like to comment on two areas, namely fares and ticketing, where greater transparency could be achieved and where further initiatives by the ORR could help to achieve improvements that would assist and encourage members of the public to use rail more often.

Given the rate at which communications capabilities are developing, there should be no reason why the industry should not develop tools that provide greater transparency and understanding on these issues.

Ticketing and Fares

The current arrangements with a wide range of ticketing types made available (with a mix of regulated fares and individual operator fares as well as promotional fares) is often discredited; not necessarily because of the large differences between the highest and lowest fares but more because of the difficulty of obtaining accurate information on the ticket types available and also of confusing and complicated rules attached to individual ticket types. In other words, there has to be greater transparency

Greater efforts must be made by train operators to enable the public to understand the fares and ticketing structure. This should primarily focus on ensuring that passengers are able to readily access the cheapest fare (standard or first) for their journey and, equally important, that the passengers are fully aware that the ticket they purchased was the cheapest available for that journey (in order to avoid 'the fury' of realising too late that cheaper fares were available).

Most 'cheap' fares are 'advanced purchase' and unregulated fares, usually restricted to the single operator's trains and often only available on that specific operator's web-site. Operators should therefore be compelled to share all information with other franchisees regarding 'advance purchase' and other 'unregulated fares' and to make them available on their web-sites.

Even more important, such unregulated fares should be made readily available for journeys involving interchanging between trains belonging to separate operators, either as a mix of several unregulated fares or as a mix of un-regulated and regulated fares. At the present, most (perhaps all) web-sites will automatically switch to regulated fares (at significantly higher cost) when the journey involves an interchange between two or more operators. Only those with a profound knowledge of the network and franchising are currently in a position to combine several unregulated and advanced fares into complete journeys involving several operators.

Most operator's web-sites now include automatic advice where two single tickets are cheaper than a return ticket .. and such information should be compulsory.

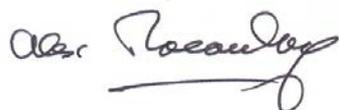
It should indeed be widened so that advice must also be given where two single tickets (from A to B and from B to C) are cheaper than a single ticket from A to C. Such scenarios are now very common (but difficult to 'spot') particularly for journeys involving an interchange between operators. There is even a private 'Apps' in development that will assist the public in spotting such anomalies. However, the best way would be to 'outlaw' these anomalies but should they continue, it should be a requirement on the industry to offer greater transparency and advise the public where a cheaper journey can be made by combing several intermediate tickets.

Finally, I would refer to a couple of situations that arose out of a lack of transparency. You may be aware of an article in "Metro" more than a year ago where it was reported that a person was presented with a fine of £155 for alighting the train one station before the named station on his 'advance' ticket. Although the Operator was within the rules to do so, it is nevertheless the case that incidents like this will only discredit the railway industry and do nothing to encourage a modal shift away from the car. If the 'rules' that create these situations can't change, then the industry has to improve transparency and make sure there is a greater understanding amongst the users of such rules.

A further example; Six people travelling together between Stirling and Edinburgh were advised by the Guard that they should have purchased a group ticket to save one person's fare. They complained to the operator who advised in writing that they were not required to advertise special offers and it was up to the customer to ask for them at the ticket office. It should be said that they were successful in getting a refund .. but it still raises the question how customers are expected to know about offers if they are not publicised.

I trust that these comments will be of assistance. Should you wish to discuss the issues further, please contact myself (alex.macaulay@sestran.gov.uk tel 0131 524 5152) or Trond Haugen (trond.haugen@sestran.gov.uk tel 0131 524 5155)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alex Macaulay', with a horizontal line underneath.

Alex Macaulay
Partnership Director

C.C. Cllr Russell Imrie, Chair of SEStran