Signalling Market Study

Remedies monitoring report

21 April 2023

Contents

Executive summary

1. We undertook a market study into the supply of signalling systems, concluding in November 2021. We made a number of recommendations, predominantly addressed to Network Rail, targeted at a number of important barriers to competition and value for money which we had identified in a market which has become increasingly dominated by two incumbent suppliers.

2. In this remedies monitoring report we present our conclusions on the progress made towards responding to our recommendations.

3. The key initiative which Network Rail committed to in its response to our market study was to significantly revise its approach to procurement for Control Period 7 ('CP7') onwards, towards an approach whereby Network Rail's reliance on the incumbent suppliers would be lessened. The process of procuring under this new approach is now under way. Network Rail has also committed to a number of further specific initiatives.

4. Overall we are satisfied that the majority of our recommendations have been addressed, either to completion or to an extent that in our view there is no need for continued close regulatory oversight. We will henceforth monitor these recommendations on a 'business as usual' ('BAU') basis, through data collection and existing regulatory mechanisms.

5. There are two recommendations relating to, firstly, education and cultural change and, secondly, performance measurement, where we consider our active monitoring to remain open. We intend to continue working with Network Rail to ensure that these recommendations are completed.

1. Introduction

1.1 In November 2020, we launched [a market study into the signalling market in Great Britain ('GB')](#).

1.2 Our market study found that the GB signalling market is characterised by:

- High concentration of suppliers, the market for major renewals being dominated by historic incumbents Siemens and Alstom;

- Significant concerns over value for money; and

- Barriers to entry/competition, including:

    – Market and funding issues – around the total volume, stability, and predictability of re-signalling volumes. These result both from the overall availability of funds but also the way in which Network Rail chooses to present its pipeline of opportunities to the market. These factors disproportionately impact smaller and would-be competitors;

    – New technology – barriers to the introduction of new technology;

    – Balancing – we observed considerable discordance between the objectives of Network Rail's (broadly speaking pro-competition, value for money conscious) centre and its (broadly speaking risk/change averse, delivery focused) regions; and

    – Interfacing with the installed base – issues caused by the need to interface with incumbents' technology, imposing a significant barrier to entry.

1.3 We published a [market study report](#) in November 2021 which included a series of recommendations that [Network Rail responded](#) to in February 2022 ('February 2022 response'). We also published [an update](#) in July 2022 ('July 2022 update') which described the progress made towards completing those recommendations.

1.4 Since the publication of the market study report we have maintained regular engagement with Network Rail to ensure that the changes it was making to its procurement process remained compatible with the objectives of our recommendations.

1.5   This paper provides an update on progress since our July 2022 update as well as an assessment of Network Rail's responses to date. It also sets out what the next steps are as we progress towards the start of CP7, which covers the five-year period from 1 April 2024.

Figure 1.1   Timeline of events since the publication of our market study report

1.6   Our recommendations were largely aimed at Network Rail which has committed to make a number of changes to its procurement process used in CP6 which will take effect from CP7 onwards. We discuss the new procurement process in more detail in the next section.

1.7   The ultimate test of the effectiveness of Network Rail's response will be through the trajectory of its unit costs. Clear evidence of cost trends will not become visible until a number of projects have been completed under Network Rail's revised procurement approach. We will be proactive in monitoring these trends.

2. Summary of progress

Overview

2.1   Overall we are pleased with the progress that has been made. Following the publication of our market study's final report we have continued to meet with Network Rail on a regular basis to track progress.

Closed recommendations

2.2   Overall, we are satisfied with progress against most of our recommendations such that there is, in our view, little need for continued close regulatory oversight of the implementation of these recommendations. In this report we label such issues as 'Closed'. We will continue to retain broad oversight over the market including through our ongoing monitoring of the data which Network Rail will supply to us under the first of our remedies.

Open recommendations

2.3   There are two remaining areas where there has been a lack of progress and where Network Rail needs to do more. We discuss the current status and next steps in each of these areas in the next section. In this report we label such issues as 'Open'.

Network Rail's revised procurement approach

2.4   Network Rail's key initiative which it committed to in its response to our market study was to significantly revise its approach to procurement for CP7 onwards in a way that reflects the conclusions of our market study. The first deployment of this revised approach will be through Network Rail's new Train Control Systems Framework (TCSF).

The TCSF

2.5   The TCSF is a programme for the procurement of major signalling renewals and enhancements in CP7 and CP8.

2.6   A key feature of the TCSF is that it comprises two lots, one for conventional signalling and one for digital. Each lot will be allocated four framework suppliers. Network Rail has told us that it expects the digital lot to be more strongly contested, since it is seen as a newer market with better prospects for growth.

2.7   Each winning framework supplier will be allocated a percentage of the overall workbank, with those suppliers whose bids score highest in the tender evaluation being allocated the largest proportion of work. An internal 'Network Rail Allocation Group' (NRAG) will allocate projects to framework suppliers according to their bid scoring and strengths relative to specific projects.

2.8   Alongside the work allocated directly to winning framework suppliers, Network Rail will also make a proportion of the workbank available to be won through 'mini-competition'. Framework suppliers will be given the opportunity to bid for additional work through this process, which will take previous performance measures including co-operation with other suppliers into account, giving the strongest performing suppliers the greatest likelihood of winning additional work. We discuss this further in the next section.

2.9   During our engagement with Network Rail we discussed the potential to go back to the open market part way through the TCSF to give suppliers who were not successful at winning a place on the Framework a second opportunity. Network Rail plans to do this through a second framework, thus this mechanism does not feature in the TCSF.

2.10   The TCSF was originally planned to launch in July 2022 but Network Rail made a significant number of changes to the framework, partly as a result of feedback from suppliers, which necessitated significant revisions to the framework documentation. This led to Network Rail delaying the launch of the TCSF to March 2023 and to a small number of our recommendations not related to the TCSF being delayed. These recommendations are marked as 'Open' in the next section where we discuss them in more detail.

Other initiatives

2.11   Although the TCSF is the single most significant initiative Network Rail has committed to in response to our recommendations, there are a number of other specific initiatives outside of the TCSF which Network Rail has committed to. We discuss these in more detail in the next section.

Feedback from suppliers

2.12   Following the publication of our market study report, we have sought to maintain contact with key stakeholders, in particular suppliers who took part in the market study, to understand their reaction to the changes.

2.13   Overall, feedback from suppliers has been positive. In particular we noted from the supplier event held by Network Rail in July 2022 that there was consensus on the issues with past procurement processes and the key changes required to resolve them. We noted suppliers' willingness to embrace the changes and enthusiasm for a substantially new approach.

2.14   The postponement of the launch of the TCSF may have introduced some uncertainty and we heard feedback from some suppliers that they were beginning to doubt whether the promised new approach would come to fruition or somehow become less favourable. We shared these concerns with Network Rail and received reassurance that it was maintaining regular contact with suppliers to restore confidence.

3. Progress against individual remedies

Remedy 1 – Increased regulatory oversight

Reporting of volumes and costs (Remedy 1)

Status: Closed

3.1   We recommended that Network Rail supply us with additional information on signalling volumes and costs. This is to give us the ability to measure the success of the changes Network Rail is making in respect of creating a more competitive market and the impact this has on delivering better value for money.

3.2   Network Rail has now shared a first dataset with us, pertaining to the 2021/22 financial year, i.e. to a time period midway through CP6. This pre-dates the reforms which Network Rail has subsequently begun to put in motion for CP7 and beyond. Our intention is that this first year's datasets will act as a baseline for our future monitoring effort. The primary value of collecting this data will be through the time series comparisons which will become possible once we have started to receive cost data covering CP7. We intend to refine the dataset supplied to us through ongoing working level discussions over the coming financial year.

3.3   We are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it but as we receive data we will monitor its use and effectiveness and work with Network Rail if changes are required.

Remedy 2 – A pro-competitive approach to recruitment

Decline in integrator interest

Status: Closed

3.4   We said that Network Rail should consider the lessons from its past work with integrators and the reasons for their decline in interest. At the time we wrote our final report, we saw the involvement of integrators as a potential means by which Network Rail could broaden its supply base. The importance of this route to market in our view remains strong, not least in the light of ongoing merger and

acquisition activity[1] which has the potential to reduce the number of potential OEM suppliers.

3.5   The TCSF addresses the underlying issue of an overly narrow supply base by committing to engage a minimum number of suppliers for both conventional and digital signalling renewals. In particular, for conventional renewals, where the business case for new OEM entry is likely to be relatively weak, the TCSF's approach seems likely to promote integrator involvement in top-tier work.

3.6   We also note that Network Rail's plans for the TCSF include contract requirements and performance assessment criteria intended to ensure that suppliers work together where necessary[2].

3.7   In the light of these steps, we are overall satisfied with progress against this recommendation and as such we do not propose to continue close oversight of it.

Refunding bid costs of suppliers

Status: Closed

3.8   We said Network Rail should consider refunding the efficiently incurred bid costs of suppliers. This recommendation was intended to address the potential exacerbation of other barriers to entry caused by supplier bidding costs, particularly for new bidders who were as yet unfamiliar with Network Rail's processes.

3.9   Bidding costs had not been one of the small number of key barriers to entry identified in our study. Rather, actions to mitigate bidding costs were something that was suggested by some stakeholders relatively late in our review.

3.10   Our understanding at the time of writing is that Network Rail does not, either through the TCSF or otherwise, plan to adopt measures whereby bidding costs would be refunded. However, the TCSF in effect addresses these or similar issues in two separate ways:

● the TCSF's proposed contract project allocation mechanisms should, by reducing the extent of tendering 'from scratch', put downward pressure on the costs incurred by firms in bidding for individual projects; and

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[1] see https://www.gov.uk/cma-cases/hitachi-slash-thales-merger-inquiry

[2] Network Rail has committed to enforcing contractual obligations on suppliers to cooperate and to assist with resolving disputes between suppliers. These initiatives are discussed in more detail under Remedy 3.

- through the TCSF, Network Rail has committed to making a contribution to the costs of developing digital signalling products. During our study, feedback from suppliers indicated that product development posed a much more significant barrier to entry than bid costs.

3.11 In the light of the above we are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it.

Neutral tendering

Status: Closed

3.12 We said Network Rail should construct tenders neutrally so as not to unduly favour an individual supplier or technology. This recommendation was intended to mitigate historic issues associated with Network Rail specifications directly or indirectly favouring the technical solutions controlled by a certain supplier or suppliers.

3.13 Through the TCSF, Network Rail has committed to provide suppliers with outcome-based contracts which allow suppliers to innovate. In their submissions to the Invitation To Tender, bidders are required to provide evidence of previous experience and expertise in developing solutions rather than product technical specifications.

3.14 Network Rail told us that ETCS technical specifications have been widely consulted on by the EU Agency for Railways and Rail Safety and Standards Board so bidders have had the opportunity to become familiar with them and should be aware of what to expect. Furthermore, suppliers have the ability to engage with Network Rail on technical specifications both during the tender process and at any time via its "standards challenge" mechanism.

3.15 The full extent of Network Rail's move to what it describes as outcome-based contracts will only be observable once Network Rail has completed tender evaluation exercises within the TCSF. However, based on our high-level review of the TCSF documentation we are generally satisfied that there are good reasons for us to be hopeful that Network Rail's revised procurement process does not favour individual suppliers or technologies, and that Network Rail is committed to neutral tendering.

3.16 We are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it. We do, though,

invite suppliers to contact us if it appears to them during the TCSF tendering process that, inadvertently or otherwise, biases of the sort which have been observed previously have been introduced.

Crediting bidders for pro-competitive performance

Status: Closed

3.17   We said that Network Rail should credit bidders who can demonstrate experience of and commitment to cooperating with other suppliers, including by providing access to technology.

3.18   Network Rail requires suppliers responding to the TCSF Invitation to Tender to provide a strategy and roadmap, including timeline, that describes how the supplier will work with other suppliers to deliver open interfacing and maximise the connectivity of their products.

3.19   Furthermore, the TCSF evaluation criteria for all lots including digital and conventional frameworks will reward suppliers showing commitment to, and making proposals for, the strengthening of cooperation in particular around interfacing (e.g. EULYNX[3] compliance).

3.20   Our review of the criteria found that collaboration is afforded the second highest weighting, indicating that significant credit is being given to suppliers committing to cooperation.

3.21   In light of these findings we are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it.

Remedy 3 - Interfacing

Open interfacing and common standards

Status: Closed

3.22   We said that Network Rail should treat open interfaces as a priority and be at the forefront of the move toward common standards. In its response Network Rail

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[3] EULYNX launched in 2014 and is an initiative set up by 10 infrastructure managers aimed at standardising interfaces which are seen as crucial. https://eulynx.eu/

undertook to ensure that suppliers would be required to comply with common standards and to demonstrate a commitment to open interfacing.

3.23   We have reviewed the framework documentation and note that there is a slightly different approach between digital and conventional signalling.

Conventional signalling

3.24   As we explained in our market study report, conventional signalling systems are made up of multiple individual components installed by different suppliers using largely incompatible technologies. 65% of these systems are expected to reach the end of their life in the next 15 years (86% in the next 20 years) and will be replaced with digital equivalents. As such it was not our expectation that Network Rail would move to implement a new common standard for conventional signalling and require suppliers to modify their existing installed products to comply. Rather, our expectation in this area was that Network Rail would exert greater pressure on suppliers to cooperate and ensure that when issues at interfaces occur the impact on price and delivery is minimised.

3.25   We discuss cooperation in more detail in the next recommendation.

Digital signalling

3.26   The situation for digital signalling is more straightforward insofar as we can see in the TCSF documentation that all suppliers will be required to comply with European Train Control System (ETCS) specifications. ETCS is a system created from the need to harmonise standards across the European Union and, amongst other objectives, enable signalling systems to interface at borders between EU States. ETCS is therefore inherently supportive of open interfacing and common standards. We are confident that Network Rail's requirement to comply with ETCS standards will largely resolve the interfacing issues in the digital market.

3.27   We are overall satisfied with Network Rail's progress against this recommendation. We will continue to monitor Network Rail's participation with initiatives such as EULYNX through our oversight of the T190+ initiative.

Contractual obligations to cooperate

Status: Closed

3.28   We said that Network Rail should maintain and enforce contractual obligations requiring suppliers to cooperate. This is because the evidence we saw in the

market study showed that the risks associated with interfaces were a material driver in Network Rail's procurement decisions.

3.29   Under the TCSF suppliers will be contractually obliged to cooperate with other suppliers particularly in regard to technology interfaces. Furthermore, as we noted in our analysis of remedy 2 above, suppliers who make commitments to cooperating will also be given significant credit in the assessment of their bids to become framework suppliers.

3.30   Furthermore, Network Rail has introduced alliance contracting which will encourage suppliers to work together by requiring them to participate in an incentivisation regime where suppliers share equal responsibility for the delivery of the project such that, for example, any penalties for under-performance will be borne equally by all parties in the contract.

3.31   We are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it. We do however invite suppliers to contact us if they find that in practice these measures have not resolved issues with cooperation between suppliers.

Addressing inter-supplier concerns

Status: Closed

3.32   We said Network Rail should strengthen its mechanisms for addressing the concerns which have in the past periodically arisen between suppliers who work in close proximity, notably when working on adjacent schemes.

3.33   The TCSF governance structure includes a Supplier Forum, which will meet quarterly and be attended by representatives from each framework supplier and Network Rail. This Forum will fulfil a number of functions including the review of interfacing issues and discussion of resolutions to issues raised by suppliers.

3.34   We are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it. We recognise, though, that the ultimate success of the Board will depend on effective chairing and on and willingness amongst suppliers to engage constructively therefore we will invite suppliers to contact us if they find that in practice Network Rail is not intervening strongly enough when there are issues between suppliers.

Remedy 4 - Balancing

Advocating pro-competitive tendering in the regions

Status: Closed

3.35 We said Network Rail should play a more active role in the oversight of signalling procurement in the regions and take steps to advocate pro-competitive tendering. This is because we want Network Rail to ensure that the pro-competition approach that already exists in Network Rail's central procurement team percolates down to all levels of the organisation.

3.36 In its February 2022 response Network Rail committed to establishing a Framework Leadership Board with representatives from across the Network Rail regions to look at the overall work allocation, supplier performance, technology adoption and other related issues, across the future relationships and suppliers. The forum will be set up to coincide with the end of the TCSF tendering process so that it will be in place before the framework suppliers are chosen. According to timescales provided by Network Rail we expect this to occur in September 2023. We have reviewed the Terms of Reference for the Board and we are satisfied that the necessary measures are in place, though as with any such initiative the success will depend largely on the effectiveness of the chairmanship and willingness of individuals to participate. We have offered to lend support to the Board, including by attending meetings and reviewing training materials.

3.37 We are overall satisfied with Network Rail's progress against this recommendation and as such we do not propose to continue close oversight of it. However, we believe that this initiative, alongside the delivery of an education programme (see below), is fundamental to the success of the broader cultural change required to transform Network Rail's approach. As such we will continue to monitor the overall approach to procurement and will consider reopening this issue should it become apparent that the pro-competitive approach advocated by Network Rail centre is not being adopted by the regions.

Deliver a competition education programme

Status: Open

3.38 We said Network Rail should deliver a competition education programme to ensure that those involved in procurement were aware of the value of competition and made decisions that maximise the benefits of competitive tendering. We

regard this as important in supporting the cultural change required within Network Rail to ensure the promotion of competition at all levels of the organisation.

3.39   Network Rail committed to delivering an education programme in its February 2022 response. We understand that Network Rail is at the time of writing in the process of developing training materials, but that training has not yet commenced. During our engagement with Network Rail it has argued that the principal target of such a measure should be its regional rather than central teams. Network Rail's view is that for the education programme to have maximum benefit the optimal timing for its launch would be later in the TCSF tendering process when the teams that will be managing the supplier relationships have been assembled. Network Rail has provided us with a programme which indicates that training should commence in September 2023.

3.40   In April 2022 we wrote to Network Rail, making it clear that we believe the scale of the cultural change required is not to be underestimated and in order to maximise the benefit, Network Rail needs to commence the programme sooner. We also argued that commencing the programme sooner would benefit the awarding of contracts under the CP6 framework which will remain in place until March 2024.

3.41   We remain concerned that the impact of Network Rail's planned education programme will be lessened as a result of its planned timings. As such we consider this recommendation to be open. We have offered our support in developing training materials and we have asked Network Rail to provide us with a draft of these for our review as soon as possible.

Reforming Network Rail's performance management regime

Status: Open

3.42   We said that Network Rail should reform its performance management regime in ways that do not disincentivise the use of new suppliers' technologies. Our market study had found that a key disincentive for regional managers to use new suppliers or new technology was the risk that 'teething troubles' of the sort that might be routinely expected of a first in class deployment would impact performance and reflect negatively on them.

3.43   In its February 2022 response Network Rail said it believed that the package of measures it was taking to balance work between suppliers, such as the new procurement strategy and the establishment of an internal forum, would be effective at mitigating this class of issue. We recognise that regional managers will

follow a process that inherently requires them to make balanced choices. However, the strength of regional preferences that our study found was such that we favour specific consideration of performance issues.

3.44   Network Rail told us soon after the publication of our market study report that it had concerns about the principle of ringfencing performance impacts from using new suppliers or technology, arguing that this was a complex subject that required careful thought. Since the publication of our market study, the industry has seen a number of performance challenges, including challenges caused by industrial relations issues. This has provided a challenging backdrop against which to consider reform to performance management approaches. We intend to liaise with Network Rail to ensure that this recommendation is given priority at the earliest opportunity.

Remedy 5 - Funding

Guaranteeing minimum values of work

Status: Closed

3.45   We said that Network Rail needed to strengthen the link between contract wins and the volumes that are awarded to and then delivered by individual suppliers. We also said Network Rail should consider guaranteeing a minimum value of work for each winning supplier. During our market study, suppliers had told us that they had lost confidence that Network Rail would allocate them the value of work it had originally promised because of occasions in the past when it had failed to do this.

3.46   Network Rail has substantially changed its work allocation process as part of its revised procurement strategy. Suppliers who win a place on the framework will be awarded a pre-defined proportion of the total work bank according to their performance in the bidding process and a newly established Network Rail Allocation Group (NRAG) will make 'best endeavours' to ensure that projects are allocated according to the percentage.

3.47   While it remains the case that the proportions of its workbank that will be awarded by Network Rail are not contractually guaranteed, we are on balance satisfied that the proposed approach represents a reasonable response to our recommendation against the backdrop of the uncertainty faced by Network Rail and the practical issues which arise from the lumpiness of its workbank. Using the additional information Network Rail has committed to supply to us (see Remedy 1) we will

monitor the link between contract wins and work allocation and take steps if it appears Network Rail is not honouring this commitment.

Funding research and development

Status: Closed

3.48   We said that Network Rail should establish a centralised research and development fund that suppliers can draw from to reduce the risk they take in developing new technologies and products for the UK signalling market.

3.49   Network Rail has made provision for research and development funding in its submission for CP7. This includes funding for large renewals and supplier development costs.

3.50   Network Rail considers that success of this initiative is largely dependent on the funding determination for CP7 and aligned industry funding for related activities such as on-board fitment of ETCS to rolling stock.

3.51   We are satisfied that Network Rail has taken reasonable steps to respond to this remedy and consider it closed. We will continue to monitor the funding situation as part of our engagement with the Periodic Review 2023 ('PR23') process.

Funding of the Long Term Deployment Plan (LTDP)

Status: Closed

3.52   The LTDP is a programme that aims to coordinate the approach between Network Rail, Train Operating Companies, Department for Transport (DfT) and the rail supply chain to deliver the digital railway.

3.53   We said that industry should take steps to build confidence in the LTDP and that we would work with the DfT to consider the need for in-cab signalling within the context of the LTDP.

3.54   The DfT reinforced its commitment to replacing life-expired conventional signalling with digital signalling in a statement to Parliament on 1st December 2022[4]. The statement recognised the importance of the visibility of the pipeline of work and that the Secretary of State, *"...fully expects a clear approach to promoting pipeline*

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[4] Railways Act 2005 statement: high level output specification 2022, https://www.gov.uk/government/publications/railways-high-level-output-specification-2022/railways-act-2005-statement-high-level-output-specification-2022.

visibility...". DfT also recognised the need for, *"...a fully joined-up approach to implementing the expansion of digital signalling"* and said that Network Rail should *"also prepare for the continued rollout of digital signalling in future Control Periods by progressing design and cab fitment work where possible and appropriate"*.

3.55   Much of the current uncertainty in the supply chain stems from the funding constraints the rail industry has operated within for some time. This uncertainty has been exacerbated by the impact of the COVID-19 pandemic. Later this year, we will publish our PR23 final determination[5], which will address issues including the funding of in-cab signalling.

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[5] See https://www.orr.gov.uk/monitoring-regulation/rail/networks/network-rail/price-controls/pr23

4. Summary and next steps

4.1   As explained in the previous chapter, we consider our close monitoring of most of our individual recommendations to be at an end. We will monitor these recommendations, as with the market as a whole, on a BAU basis through existing regulatory mechanisms including our periodic review process and associated monitoring.

4.2   There are two recommendations relating to, firstly, education and cultural change and, secondly, performance measurement, where we consider our active monitoring to remain open. We intend to continue working with Network Rail to ensure that these recommendations are completed.

4.3   Should it become clear to us through our BAU monitoring activity that Network Rail has not fully implemented the changes that it committed to or that the changes implemented have not delivered the intended benefits, we will consider the case for re-opening our market study. We may in such circumstances make use of our existing regulatory powers, such as licence enforcement or, ultimately, make a Market Investigation Reference to the Competition and Markets Authority, which holds extensive powers to implement legally enforceable remedies.

4.4   In addition to our BAU monitoring we will maintain contact with Network Rail through quarterly meetings, focusing on plans to deliver outstanding recommendations. We will also consider feedback from suppliers on how the changes brought about by the TCSF are working in practice.

4.5   We will also remain vigilant towards the risk of anti-competitive conduct within the supply chain. Over the course of our market study and our subsequent work we did not find compelling evidence of such behaviour on a scale sufficient to warrant opening an investigation, but we remain aware of some ongoing concerns within the industry. Should we receive a complaint about possible anti-competitive conduct, including allegations of refusal to supply, we will consider the use of our competition law powers to intervene.

4.6   The ultimate test of the effectiveness of Network Rail's response will be through the trajectory of its unit costs. Clear evidence of cost trends will not become visible until a number of projects have been completed under Network Rail's revised procurement approach. We will be proactive in monitoring these trends.