

ORR Retail Market Review: Response to Consultation

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30th October 2014

Global Travel Ventures has specific responses for question 4 (chapter 3); question 10 (chapter 4) and question 13 (chapter 5). No specific responses are provided for the other questions.

Q4: The prohibition for 3rd party retailers to sell season tickets is considered anti-competitive as it is the TOCs which continue to withhold this facility.

The prohibition of 3rd party retailers from selling Permanent Temporary Fares is considered both anti-competitive (as the TOCs only sell these 'headline' fares on their own websites) and misleading for customers (as 3rd party retailers can show these fares but not sell them). The derogation for Temporary Fares being made Permanent by the DfT may also be anti-competitive as it is a Government action specifically impacting an open commercial market and may also be counter to European Competition Rules.

Q10: As shown in responses to the February call for evidence, TOCs claim that not being able to add fees means that the actual costs of retailing cannot always be covered. This is the same for 3rd party online retailers and therefore the distortion caused due to TOCs not being able to charge fees is that prices for customers using 3rd party retail sites are higher than TOC sites and TOCs may even be subsidising their online retail functions from other parts of their businesses, which may be anti-competitive in relation to 3rd Party Retailers and in the case of TOCs receiving Government Support under their franchise, may be counter to European Competition Rules.

Q13: The continuation of old rules created to stop other TOCs having to incur the costs to sell Temporary Fares for short-term events in another region of the UK, to now bar 3rd Party Retailers from selling Temporary Fares and Permanent Temporary Fares online, should be ceased with immediate effect.

The bar on 3rd Party Retailers from selling Season Tickets should be also removed with immediate effect.

Regards,

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