



ASSOCIATION of TRAIN OPERATING COMPANIES

Sukhninder Mahi
Senior Executive, Licensing and Network Regulation
Office of the Rail Regulation
One Kemble Street
London WC2B 4AN

11th June, 2012

Dear Sukhninder

ORR Consultation on Penalties Policy

Thank you for the opportunity to respond to your consultation on policy towards penalties.

ATOC welcomes and supports the changes to the ORR policy on penalties set out in the letter from John Larkinson on 14 May. We firmly believe that the option should be available of accepting commitments to make improvements for passengers as an alternative to levying a penalty. Indeed we sought such an option at the time of the £14m fine levied on Network Rail in 2008.

ATOC is keen to work with you to develop operational rules that could be used if and when another instance arises where reparations in lieu of a fine is appropriate.

Kind regards

A handwritten signature in black ink, appearing to read 'Alec McTavish', written over a horizontal line.

Alec McTavish
Director, Policy & Planning
ATOC

Tel: 020 7841 8006