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12 November 2014

Dear Philip

Towards a code of practice on retail information

Thank you for the opportunity to respond to this consultation. We confirm that no part of our response is confidential and as such we are happy for it to be published in full.

We recognise that the increasing number of passengers travelling by rail has led to the identification of market opportunities in ticket retail and therefore an increased range of tickets and fares. While the ticket retail market has developed, the fares structure and general ticketing arrangements has become more complex.

We agree that as an industry we need to make sure that passengers have sufficient and clear information in order to make informed choices as to the most appropriate ticket to purchase for their journeys.

We recognise that ORR's market research is supportive of the conclusion that passengers' awareness of rights, terms and conditions is low and as such it is difficult for them to know what information to consider when making arrangements for travel and purchasing tickets.

While we do not have direct involvement in ticketing arrangements, we are committed to providing appropriate, accurate and timely information including during times of disruption so as to enable a passenger to buy a ticket based on accurate information.

We consider that passengers should have access to the type of information as highlighted in the consultation document such that it is easily understood by all passengers. However, ORR's consultation acknowledges that not all the information suggested for inclusion within a code will be important to all people. Therefore it would be beneficial to explore ways in which to avoid people being flooded with information that isn't relevant or helpful to them.

We are supportive of principles which make ticket purchase, and consequently travel by rail, accessible to all passengers. We believe that simplifying and clarifying the process will encourage and allow passengers, particularly those with disabilities, to travel on the network.





For a code to be as effective as possible, it will need to be joined up with the work and initiatives already being undertaken by the industry and therefore we believe the development of a code should be industry-led. We are aware of a number of initiatives being undertaken including the work by the Rail Delivery Group (RDG) transparency sub-group which is looking at key transparency indicators for the industry as a whole.

We already make timetable information available daily at no cost to any interested industry parties in raw data format. This in turn has helped facilitate the development of innovative electronic applications that are today used by the travelling public as a matter of routine. We will continue to work with the industry to understand how we might assist further with the availability of information for passengers through technology and innovation as we work to develop the digital railway.

In addition to timetable information, Network Rail is keen to engage with industry colleagues to explore access to broader data sets for wider industry purposes such as long term planning. Data mining has the potential to remove complexities in industry processes and will ultimately serve to benefit the passenger.

We look forward to engaging further in this area.

This letter is copied to Paul Plummer, Group Strategy Director and Jerry England, Digital Railway Director at Network Rail.

Yours sincerely

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Kara Johnson Senior Regulatory Specialist