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trainline.com

Marcus Clements
ORR
One Kemble Street
London
WC2B 4AN
BY EMAIL

27 June 2019

Dear Marcus

Thank you for your letter.

We would like to start by reassuring you that we take our obligations under the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) very seriously. Meeting passenger needs and providing a positive customer experience are always a priority for Trainline and we are therefore very concerned by suggestions of 'misleading actions and omissions'.

As we will show you in this letter, the source of this issue is with the underlying industry data on which we depend, specifically the fact that we receive no reliable information on any planned disruptions/planned engineering works more than 12 weeks ahead. Where we do receive reliable information (mainly <12 weeks) we make sure customers are informed of any disruptions. We are also continuing to enhance the information we already offer to our customers and addressing each of the points you raise.

Background

We know many customers value the opportunity to purchase tickets more than 12 weeks in advance of their journey. Whilst the industry provides timetable data for journeys beyond a 12 week horizon, the associated information relating to planned engineering works available from the industry (the National Rail bulletin data) is only available up to 12 weeks in advance.

This means that retailers do not have access to standard, reliable industry data for providing planned engineering work disruption information to customers for journeys more than 12 weeks in advance. Retailers are heavily dependent on data provided by the industry, which they neither generate nor control.

This gives rise to issues such as those evident in relation to the Kings Cross August bank holiday engineering works. The industry recognised that no structured information was available and as a result ad hoc information and guidance was given to retailers which was inconsistent, at times unreasonable and not in the customer's best interests (including an insistence that we should not retail train tickets for the services that *were* running).

To ensure all retailers can provide standard, reliable data to customers, we believe the management of disruptions and unconfirmed timetable data beyond the 12 week booking horizon needs to be dealt with at an industry level, for example by the National Rail bulletin covering a period beyond 12 weeks. We first raised this with the industry (specifically RDG) in April 2019 and are yet to receive a response.

As this has not yet been resolved at an industry level, we find ourselves in a position where we are having to invest in resource and create processes to compensate for significant limitations in industry data.

Action taken by Trainline to supplement industry data limitations:

Notwithstanding the lack of industry support in this area, we are addressing each of the requests made in your letter with a solution, which enhances the information we already make available to our customers.

1. Improve information provided on our site during the ticket purchasing process for travel beyond the 12 week window:

a) Where there is known planned engineering works and resulting disruption to train services:

We will provide disruption information notification (in the ticket purchasing process) for all known engineering works beyond the 12 week window and we intend to implement these enhancements during August 2019. We are awaiting from RDG instructions on how best to obtain this information and are reliant on their action to deliver this on time. We have attached a mock-up example of how such notifications will appear in Appendix 1, for reference.

b) Where services are unconfirmed to specifically highlight the possibility of planned works and disruption:

We will amend the existing messaging we already display to customers where services are unconfirmed, to highlight the possibility of planned engineering works, as you request. We intend to implement this enhancement during August 2019. We have attached a mock-up example of this amended messaging in Appendix 2, for reference.

In addition to this, as stated above, we are investing in resources to compensate for the current limitations in the National Rail bulletin data, so that we can provide customers with clear disruption information beyond the 12 week window.

2. Proactive information provided to customers who have purchased tickets prior to information being provided on our site:

Our proposals above will ensure we provide customers with notification information for planned works (where information is available) in relation to journeys beyond 12 weeks.

In relation to existing bookings, we are in the process of rolling out automated notifications for customers to inform them of timetable changes. In respect of the Kings Cross disruption, we had already emailed affected customers to explain the situation regarding the disruption and gave them the opportunity to refund their booking free of charge, if they wished to do so. A copy of the email communication is attached in Appendix 3, for reference.

We hope our investment in resource, ongoing development work, and our continuing engagement with the industry to find a suitable solution for this issue, meets all of the concerns you raise and provides you with reassurance that we take our obligations under the CPRs seriously and that we want to ensure our customers receive clear and accurate information. We are, of course, open to further discussions on this matter to explore the best way to ensure a consistent industry managed approach to this issue and would welcome your support in this regard.

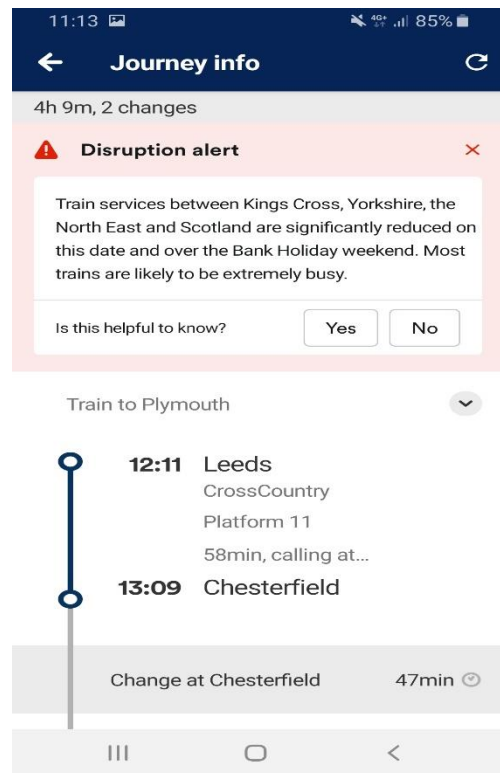
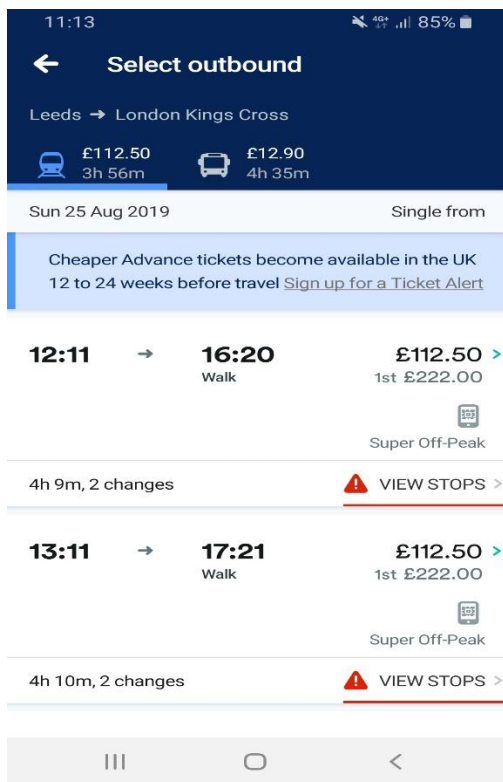
Yours sincerely

Neil Murrin

General Counsel and Director, Regulatory Affairs

Appendix 1 – Disruption bulletin example

Mobile app:



Appendix 2 – Unconfirmed timetable message

trainline EN / GBP Business Help Register Sign in

London → Manchester OUT 14 Nov • 14:45 RETURN Add a return 1 ADULT No railcards 🔍

Via / Avoid

By Train • £88.60 • 2h 6m By Coach • £7.40 • 5h

Cheaper Advance fares usually go on sale 12 weeks before travel
 Be the first to know when Advance fares for your journey are available - [sign up to a Ticket Alert Email today](#).
 Remember train times may be revised until about 12 weeks before travel (because of engineering works) - check back here closer to your time of travel for any changes.

Cheapest Single fares from £88.60

OUT
 Thu 14 Nov 2019
 London Euston to Manchester Piccadilly

Earlier

	Standard	1st class
14:40 → 16:46 2h 6m, 0 changes	<input checked="" type="radio"/> £88.60	<input type="radio"/> £155.00
15:00 → 17:05 2h 5m, 0 changes	<input type="radio"/> £88.60	<input type="radio"/> £155.00
15:20 → 17:28 2h 8m, 0 changes	<input type="radio"/> £175.00	<input type="radio"/> £242.00
15:40 → 17:46 2h 6m, 0 changes	<input type="radio"/> £175.00	<input type="radio"/> £242.00

Later

[+ Add a return](#)

TOTAL
£88.60
 1 adult

[Continue](#)

[Quick buy ticket](#)

OUT Thu 14 Nov
 London Euston to Manchester Piccadilly
 2h 6m, 0 changes

Off-Peak Single £88.60

You've selected the 14:40, but you can travel on any eligible off-peak train.

- Any off-peak train.
- Travel is allowed via any permitted route.
- Travel also permitted from stations near London Euston and to stations near Manchester Piccadilly. [View stations](#)



[Your account](#)



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Hi Jodie,

We wanted to get in touch to notify you of essential upgrade work that will be taking place outside London King's Cross train station over the August Bank Holiday weekend, Saturday 24th to Monday 26th August, inclusive.

The station will now be closed on Saturday 24th and Sunday 25th August, with a reduced timetable in operation on Monday 26th. As timetables had not been finalised when you completed your booking, you were able to purchase a ticket for travel to/ from London Kings Cross.

Customers are being advised to only travel over the bank holiday if absolutely necessary however if you still plan to travel, more information on alternative arrangements can be found [here](#). We'd also recommend downloading our [mobile app](#) for up-to-date train running info on the day.

If you no longer wish to or are unable to travel because of these works being carried out, don't worry as you'll be entitled to a full refund on your tickets. Please [click here](#) to submit a refund request.

We're sorry for any inconvenience this may cause.

Many thanks,

The Trainline Team

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Please do not reply to this email as we will not be able to respond.

Registered address and tax

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