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## RESPONSE TO THE OFFICE OF RAIL AND ROAD'S CONSULTATION ON THE EMERGING FINDINGS FROM ITS RETAIL MARKET REVIEW

We welcome the chance to comment and respond on the emerging findings from ORR's Retail Market Review. Our response seeks to address the specific questions as below:

### Chapter 2

*2. Do you agree with our emerging findings with respect to passengers' ticket buying experiences regarding their choice / ability of a) retailer/sales channel; b) how they buy tickets; c) their ticket format; d) the range of tickets; and e) opportunities to find cheaper prices?*

Customers should be able to readily complete a purchase or an account top-up on digital channels and receive an entitlement to travel on their preferred device. They should have the ability to easily find out what product(s) and/or account balance are stored.

Customers should be able to reserve seats on appropriate services much further in advance than 3 months when purchasing their tickets

With an increasing amount of customers purchasing tickets on mobile devices, the introduction of a standardised electronic/smart ticket is fundamental to improving customer satisfaction.

Other industries (i.e. air travel) have a far greater number of third party retailers, providing increased competition for more innovative and added value services. With ever more journey's being made with more than one mode of transport, ticket retailers and journey planners need to have access to fares data, to provide multi-modal travel opportunities.

Making fares data open and freely available will increase innovation in the industry, and align to customer's expectations

### Chapter 3

*3. What are your views on our emerging findings that TOCs' incentives to introduce new fares and products are somewhat limited? What are your views on our suggestions around DfT's role and, more specifically, the role of franchising? What are your views on our proposed recommendations that improvements be made to the industry processes to make it easier for TOCs to introduce new fares or products? Specifically, do you agree this should be taken forward now, as a matter for TOCs and governments?*

Research has shown that there appears to be a lack of incentive for TOCs to introduce new products to customers, there is also a lack of a joined up strategy to implement an interoperable smart ticketing solution across the transport industry.

### Chapter 4

*7. What are your views around the ways that industry could reduce the barriers smaller retailers face in selling rail tickets?*

Research from application developers has shown that there are costly barriers to entry with regard to fares data. Fares data should be made freely and openly available for retailers to build innovative services. Research has also shown that the complexity in fares and restrictions to travel are a barrier to entry.

*8. What are your views regarding our emerging findings that there could be increased scope for third party retailers to compete in selling tickets? Specifically, what are your views that all retailers should have access to all fares and products? What are your views on retailers' ability to discount fares, and to what extent should other retailers have access to these discounted products (at the cheaper price)? What are your views around third party retailers' inability to create new fares and products, and do you consider further consideration could be given to options that provide for a net pricing (or something similar)?*

Not all purchasable fares are visible to retailers at present.

Agreed - all retailers should have access to all fares data and products, a move toward an open data approach will ensure this.

### Chapter 5

*9. Do you agree with our emerging findings that TOCs have limited incentives to collaborate with each other in the development of shared systems? To what extent do you consider that*

*having increased emphasis through innovation funding mechanisms of the role of an integrated, national network (and thus the role of shared IT systems) could address the issues? To what extent do you consider that a strategy, led by governments with input from across industry, on future ticketing can play a role?*

Agreed, there needs to be collaboration within industry to develop interoperable solutions, which are signed by all, and mandated to be delivered.

Yours sincerely

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