

20 June 2011

Abigail Grenfell  
Manager, Licensing and Network Regulation  
Office of Rail Regulation  
1 Kemble Street  
London WC2B 4AN

Dear Abigail,

**Amending licences to give passengers the information they need to plan and make journeys – a consultation**

Thank you for the opportunity to respond to this important consultation. Transport for London (TfL) welcomes the attention being given to the provision of passenger information by the ORR and hopes it will lead to tangible improvements for customers. The current provision of information (particularly during times of disruption) often fails to meet customer expectations as demonstrated by the findings of the passenger surveys referred to in the consultation documentation.

It is important that attention is given to the role of the Association of Train Operating Companies (ATOC) in distributing service information to customers. ATOC are responsible for the National Rail Enquiries website that many customers use to obtain various types of service information. ATOC must therefore be fully involved in any plans to improve the distribution of service information to customers.

TfL's responses to the questions posed in the consultation are provided below:

- 1. Do you agree that there is a lack of clear accountability in the current framework for providing information to passengers?*

TfL agrees with this statement. It is important to consider the role of ATOC in this regard, as they have responsibility for providing data on scheduled services and planned/unplanned disruption over the internet to computers and mobile devices. Many passengers now choose to access service information in this way rather than relying solely on the sources available within the railway estate. Any strategy to improve the provision of information to customers needs to recognise this fact.

*2. Do you agree that licences are the best place to set out aligned accountabilities for providing information?*

TfL broadly agrees with this statement. The amendment of licences is a good way to ensure a consistent and enforceable approach to the provision of good customer information under all circumstances.

As the ORR point out it is also important to ensure that franchises and concessions contain proper obligations to ensure that operators recognise the requirement for them to provide accurate and timely information to customers, and to increase the incentive for them to do so. Such obligations should mirror and reinforce those contained in Licences to ensure that a coordinated approach to monitoring and enforcement is taken.

The overall approach taken must ensure that the delivery of information to customers is developed in a detailed and practical manner that is well understood by staff. This will help to ensure that the aspiration for improvement is realised in practical terms when incidents occur. Any Codes of Practice used must be capable of realising this objective.

*3. Do you agree that the split of responsibilities described is sensible?*

TfL agrees that the split of responsibilities described is broadly sensible. Provision should be made at major stations for train operators using the station to be able to pass information directly to their customers where appropriate without having to rely on Network Rail as an intermediary to ensure that the flow of information runs as smoothly as possible.

It is also important to ensure that at stations served by more than one operator the Station Facility Owner has a clear responsibility for displaying information relating to the scheduled services and planned/unplanned disruption affecting **all** operators using the station, to ensure that customers are able to plan their journeys in an effective manner.

Network Rail's role in managing unplanned disruption and disseminating information is critical. Network Rail should be obligated to ensure that the information flow to customers and stakeholders works effectively and efficiently, embracing the use of modern information systems & technology whilst ensuring that properly trained staff are available to manage the process.

*4. Are there any other changes in the way the industry handles information for passengers that would complement new licence obligations and help the industry deliver the needed improvements?*

The role of ATOC needs to be carefully considered as part of any plan to improve the delivery of service information to customers, for the reasons discussed elsewhere in this consultation response.

It is important to ensure that information on short notice changes to the

timetable is cascaded in a timely and efficient manner to the systems used to manage the purchasing of tickets. This does not always happen currently which can result in passengers being sold tickets and reserved seats for trains that do not exist.

*5. Do you have any suggestions to improve the proposed licence drafting?*

Licences should include specific commitments for operators to work with other organisations responsible for planning public transport in major conurbations, including TfL. These organisations can often play a key role in enabling the distribution of service information across all transport modes to the benefit of customers using the network.

The drafting used should reflect all the matters outlined in TfL's consultation response.

*6. Who do you think should be covered by these proposals?*

TfL considers that Network Rail together with all train and station operators should be covered by the proposals, as suggested. Consideration should be given to ensuring that freight and charter operators participate in the process as far as is necessary to ensure that information on any disruption caused by their services is passed on to rail users in an accurate and timely fashion. Consideration should also be given to the application of a similar approach to HS1 Ltd and the operators using HS1, particularly Southeastern who operate services that use HS1 as well as the classic network. A consistent and coordinated approach is key to ensuring that passengers using HS1 are kept as well informed as those using the classic rail network.

TfL also considers that ATOC should be brought into the process for delivering improved customer information, for the reasons discussed elsewhere in this consultation response.

*7. What impact do you think these proposals should have?*

TfL considers that the proposals should have a positive impact on rail customers provided that they are monitored and enforced in an effective manner. The proposals will be considerably more effective if they address the distribution of service information over the internet and other mobile platforms.

*8. What extra information about how these conditions would work in practice would be useful?*

TfL considers that further information about the enforcement of the new arrangements would be helpful. TfL would like to understand in greater detail how non compliance will be identified and the penalties this will attract. As the ORR points out there are opportunities to use franchise and concession agreements to achieve this objective.

TfL also notes that the ORR has discussed the enforcement of the proposals with the DfT and Transport Scotland. As a concessioning authority TfL would have welcomed the opportunity to participate in this discussion and remains willing to participate in the development of the strategy and associated processes as this continues.

Yours sincerely,

**Alan Smart**

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