

Response to the DfT rail fares and ticketing review initial consultation

June 2012

London TravelWatch is the official body set up by Parliament to provide a voice for London's travelling public.

Our role is to:

- Speak up for transport users in discussions with policy-makers and the media;
- Consult with the transport industry, its regulators and funders on matters affecting users;
- Investigate complaints users have been unable to resolve with service providers; and
- Monitor trends in service quality.

Our aim is to press in all that we do for a better travel experience all those living, working or visiting London and its surrounding region.

Published by:

London TravelWatch
6 Middle Street
London EC1A 7JA

Phone: 020 7505 9000
Fax: 020 7505 9003

Contents

Executive summary	1
Introduction	3
London TravelWatch casework	3
General issues	5
Issues for London passengers	8
Appendix A – Glossary	19
Appendix B – suggested redefinition of ‘London Terminals’	19

Executive Summary

London TravelWatch welcomes the opportunity to respond to the Department for Transport's consultation on the rail fares and ticketing review.

We support

London TravelWatch supports the general objectives of the review to ensure that there is an appropriate level of regulation, but also to ensure that passengers have access to clear and concise information on tickets and fares and can make informed choices as to when and where to travel.

We welcome

London TravelWatch welcomes the proposals to make fares and ticketing data more easily and publicly available to enable third parties to be able to develop information streams via the internet or mobile devices.

London TravelWatch welcomes the suggestion that a wider range of outlets should be able to sell rail tickets.

We recommend

London TravelWatch recommends that:

- The Department and industry consider a more radical change to the structure of ticketing to reduce complexity for passengers and provide a more flexible approach to peak time capacity.
- The definition of 'London Terminals' should be redefined so as to reflect passenger understanding of this important destination.
- The South East Flexible Ticketing project should be re-evaluated in the light of a clear preference by passengers for the functionality and products currently provided by Oyster.
- Train operators, Transport for London (TfL) and the Department for Transport (DfT) should accept and implement the recommendations of London TravelWatch's research into 'Oyster incomplete journeys'.
- Train operators should accept and implement the recommendations of London TravelWatch's research into 'First Class Travel'.
- Ticket Vending Machines (TVMs) should be installed at all London rail area stations where none exist at present.
- The practice of operators disabling the facility to accept cash at TVMs or installing card only TVMs is ended and the ability to accept cash is restored at locations where this has been taken away or never been in place.

- National Rail TVMs should adopt the capability of London Underground (LUL) machines and be able to sell 'extension' tickets.
- TfL and DfT should have a London wide strategy for the installation of ticket gates and security of stations, rather than piecemeal approach based on current franchises.
- There should be greater transparency of fares charged using smartcards such as Oyster to enable passengers make more informed choices as to when to travel and by which mode.
- National Rail operators should adopt TfL's practice of charging 'off-peak' fares within the Oyster pay as you go area for journeys into zone 1 on Mondays to Fridays between 1600 and 1900.
- National Rail operators and TfL should apply a railcard discount to Oyster pay as you go fares on Mondays to Fridays between 1600 and 1900.
- A campaign is needed to encourage passengers to take up their entitlements to discounted travel e.g. TfL to encourage Annual Goldcard holders to take up their railcard discount on Oyster pay as you go.
- Advance purchase tickets should be valid for a 'time band' of services rather than individual services on frequent (every 20 minutes or greater) services.
- Holders of advance purchase tickets should be able to set these against the cost of more expensive tickets for use on other trains if their travel plans change.
- Operators should adopt the practice of regularly publicising which trains are the most crowded under normal operating conditions, with alternative options, to enable passengers to make informed choices as to when and where to travel.
- The Ticketing and Settlement Agreement requirements for ticket office hours staffing should be replaced by a wider agreement on the level and purpose of staffing at stations on a more general level.

Introduction

London TravelWatch's response has been informed by our casework appeals, as well as our current and past research. The area that we have made comments about is shown in the diagram below.

Figure 1 - Map of London TravelWatch Area



London TravelWatch Casework

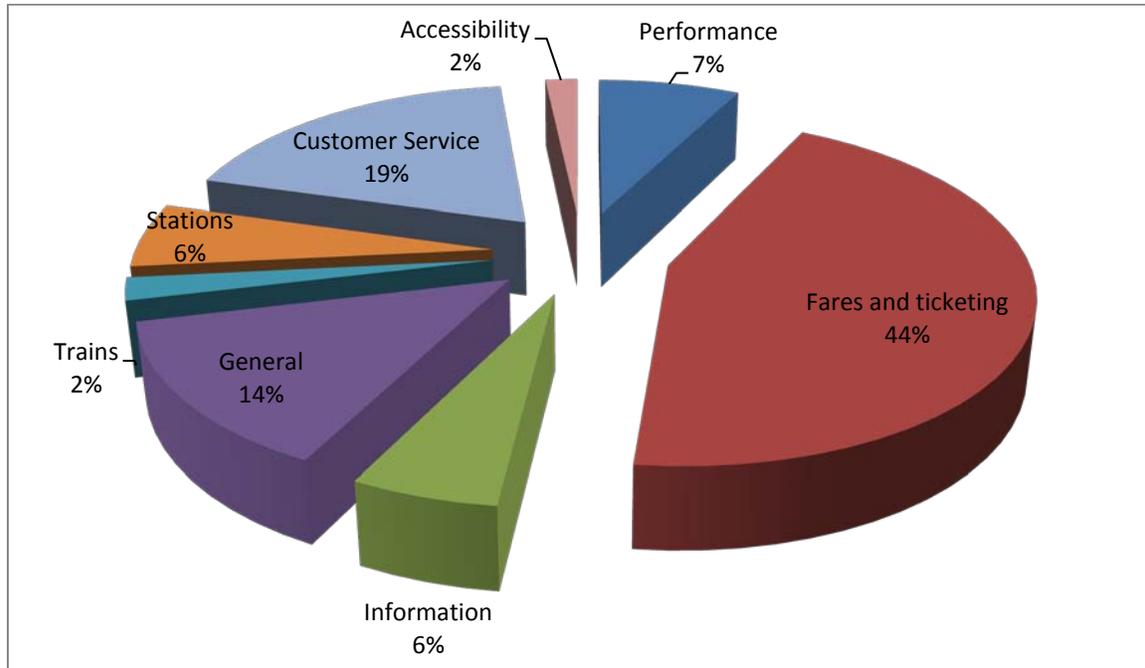
London TravelWatch is the body to which transport users appeal if they are not satisfied by the response of the transport operator's complaints process.

London TravelWatch receives around 300 appeal cases per month and 200 others from the public that either are treated as 'initials' and 'direct' cases. Of these approximately 200 per month are related to National Rail services.

Figures for the last two quarters are available at <http://www.londontravelwatch.org.uk/document/14152>

Graph 1 overleaf shows the breakdown of appeals by subject. Appeals about fares and ticketing make up the largest category with 44% of complaints, followed by customer service issues.

Graph 1 - London TravelWatch National Rail Appeals by category April 2011 to January 2012



General issues

The ORR report on *Fares and Ticketing – Information and Complexity* notes that 45% of those passengers surveyed said that the system was too complicated for them to understand. Of these, 27% felt that the complexity had an impact on their likelihood to make journeys. These are startling figures and we feel that the consultation paper grossly under-estimates the complexity problem, which could be made worse by its suggestions for new price tiers. We are concerned that the only solution proposed is that “train companies will need to do even more to help passengers understand why they might be asked to pay more on certain services but offered a discount on others” and that “Train operators could learn from other online retailers and that they should do more to ensure that the restrictions on advance fares, as well as the option to change the ticket before travel on payment of a £10 fee, are communicated clearly and prominently at the point of purchase.” There is no indication as to how this is to be achieved at a time when it is proposed to close ticket offices and reduce staff numbers. It would seem perverse to us therefore to see a recommendation that would increase the complexity of fares rather than reduce it.

This is a once in a generation chance to undertake a fundamental reform of the fares system and introduce an easily understood yet flexible structure, rather than just fiddling with the current muddling arrangements. It may mean sacrificing some of the flexibility for simplicity, but that would be for the greater good of passengers, given that complexity so often means that people do not get the best deal and are, if the ORR survey is to be believed, sometimes even put off travelling by train. There is an increasing body of opinion that excessive choice is detrimental (see for instance *The Paradox of Choice: why more is less*, Barry Schwartz 2005).

London TravelWatch believes that a new system should have the aim of ensuring people, have easy access to information about the type of ticket they need to buy for the journey they are making, and what other types of tickets they could buy if they were willing to alter their plans.

Limited tiers of fares

As an example of how to achieve the first aim, there would be fewer types of fare and a uniform system of identifying the different kinds of fare across the network. On any one journey there should be no more than four or at most five possible fares per company. Every company (as a requirement of its franchise) would use the same name for the four different tiers of fare – e.g. peak, shoulder-peak, off-peak/anytime and economy/advance (with separate arrangements for First Class). Better still, as more memorable, would be a system of colour-coding –

e.g. red for peak or the highest tier; blue for the next, etc. Each company would be free to charge what it wanted for each tier.

Thus, for a journey from London to Barchester, company A could charge £100 for the red fare; £80 for the blue fare; £60 for the green fare and £40 for the yellow fare (there could be different levels for returns, but again they would be red, blue, green or yellow returns). Company B could charge different fares at each level, e.g. £90 for red, £70 for blue etc., or indeed miss out a tier altogether.

Each company would also decide the hours and days during which it would charge the red, blue, green and yellow fares. Company A, for instance, might charge the green fare between 10.00 and 16.00, whereas Company B might charge it between 11.00 and 16.30. Thus considerable flexibility and competition would be maintained, as well as the capacity to give financial incentives to encourage a more evenly spread use of the network. Under this system passengers could travel on a variety of trains within the colour band, and only if they wanted to reserve a seat would they be limited to a specific train.

The advantage of such an approach is that tickets could be marked with the colour-coding, and it could also be shown on timetables and indicator boards to indicate which type or types of tickets were accepted on that train. People would soon get used to the system and know what to compare to what. It would also facilitate understanding of the charges levied through Oyster and similar smart ticketing systems, including smart season tickets.

A miles-based approach

In addition, more use could be made of a mileage based approach. Instead of season tickets, passengers could buy tickets with say 1,000 miles on them (this is an approach that has been successfully adopted by the Italian railways). There would be red, blue, green and yellow miles which would have different costs. The ticket could be based on say green or “anytime” miles, and if a passenger made a 10-mile journey during a “green” time of day, they would be charged 10 miles. If the passenger travelled at a peak time, they would use more miles – e.g. red miles would be worth 2 green miles and yellow miles only half a green mile, so they would be charged 20 or 5 miles. There would also be opportunity to charge lower rates for ‘contra-peak’ journeys where capacity was not an issue, but which under the current system makes rail an unattractive option due to the cost of season tickets being based on the ‘with the flow’ peak fare.

The more miles that people buy, the cheaper the miles would be. The miles would be journey miles rather than route miles – so if there were two ways of getting from London to Barchester, one longer than the other, both would cost the same.

This approach would have a number of advantages:

- Passengers would be encouraged to buy as many miles as possible up-front, thus reducing ticketing costs;
- Passengers, including commuters, could vary their journey and also use their season ticket for other journeys;
- Because more miles would be taken from the ticket at peak times, passengers would be encouraged to travel at off-peak times;
- It would cater for the increasing number of people who work part-time or partly from home, and only need to travel to their office say 3 times a week;
- If passengers no longer needed to make a particular commuter journey, either temporarily or permanently, they could still use their ticket on other journeys and use up miles that way;
- It would solve the problem of combinations of tickets giving a cheaper fare than the direct ticket.

A central database accessible to all

To achieve the second aim of easy access to information, there would be a central database financed by the industry (participation in which would again be a franchise requirement) which people could tap into through ticket vending machines, telephone, the web, smart phone app or whatever to discover what their ticket (or a ticket of another “colour”) entitled them to. The information would include the times and days and companies for which the ticket is valid; any restrictions on its use, for instance requirements to go by particular routes or to particular stations; conditions as regards cancellation and changes and other conditions of carriage.

London TravelWatch therefore strongly endorses the Department’s efforts to increase transparency in the rail industry by working with ATOC to consider how to provide open access to rail fares data currently available only by obtaining a licence. If this access were through a central database provided by the industry, combined with the simpler fares structure set out above, there should be no fears that the data would be provided in a way that “inadvertently risked disadvantaging some passengers” (a fear which we think is in any case exaggerated – it is the sort of argument advanced only too often by those wishing to restrict the free flow of information). Such a database would be complicated to set up. But that very fact should encourage companies to simplify their arrangements to the benefit of passengers.

Issues for London passengers

London Terminals

Although the principle of 'London Terminals' has been long established, London TravelWatch has seen an increasing number of appeal cases relating to the complexities of this single destination. This is attributable to the increasing number of tickets bought via the internet or via ticket vending machines, and the consequent lack of interaction with staff in informing ticket purchase. Changes to service patterns and poor implementation / enforcement regimes, particularly on the Thameslink route has also led to problems for passengers, using this route. In a number of cases enforcement action has been in the form of Penalty Fares for journeys to St.Pancras International and Farringdon from stations south of London. This is despite either fares being identical to that to 'London Terminals' ; or industry systems automatically overriding the selected destinations of St.Pancras International or Farringdon.

The public's understanding of the term of 'London Terminals' is often different to the industry. We acknowledge that the industry is taking steps to make its' definition more widely known. However, London TravelWatch believes that a more fundamental change is required. The wide industry agreement that this would require needs central direction and leadership from the Department, especially as the refranchising of the Thameslink franchise would allow for this issue to be resolved once and for all.

London TravelWatch recommends that 'London Terminals' as a destination should allow passengers to travel to and from all National Rail stations within Travelcard zone 1 at no additional cost by any reasonable direct route (example definitions in Appendix B).

Value for money

London's passengers pay the highest proportion of fares as against rail industry costs in the UK –approximately 87p in every £1. This compares against much lower proportions for inter city journeys or local journeys in the regions. London's passengers also have lowest satisfaction ratings in terms of 'value for money' for the services that they have purchased or received. In the Spring 2012 National Passenger Survey this was only 38% of users compared to 54% of users of both long distance and regional services. Other modes of transport within London managed by TfL regularly achieve satisfaction ratings between 65 and 85%.

London TravelWatch believes that any reform of fares and ticketing should seek to address this, by identifying and tackling the root causes of these low satisfaction levels and improve the rating of 'value for money' by passengers.

As the voice of London's transport users, we have through our research and our casework identified a number of specific areas where improvements could be made at modest cost.

These include the following areas:-

Incomplete journeys incurred on Oyster cards

In 2011 London TravelWatch conducted a major piece of research on the impact on passengers of 'incomplete journeys', where the passenger has for whatever reason failed to 'touch in or touch out' on their journey. Overall, around £60 million is collected each year by Transport for London (TfL) and train operators in maximum fares incurred this way.

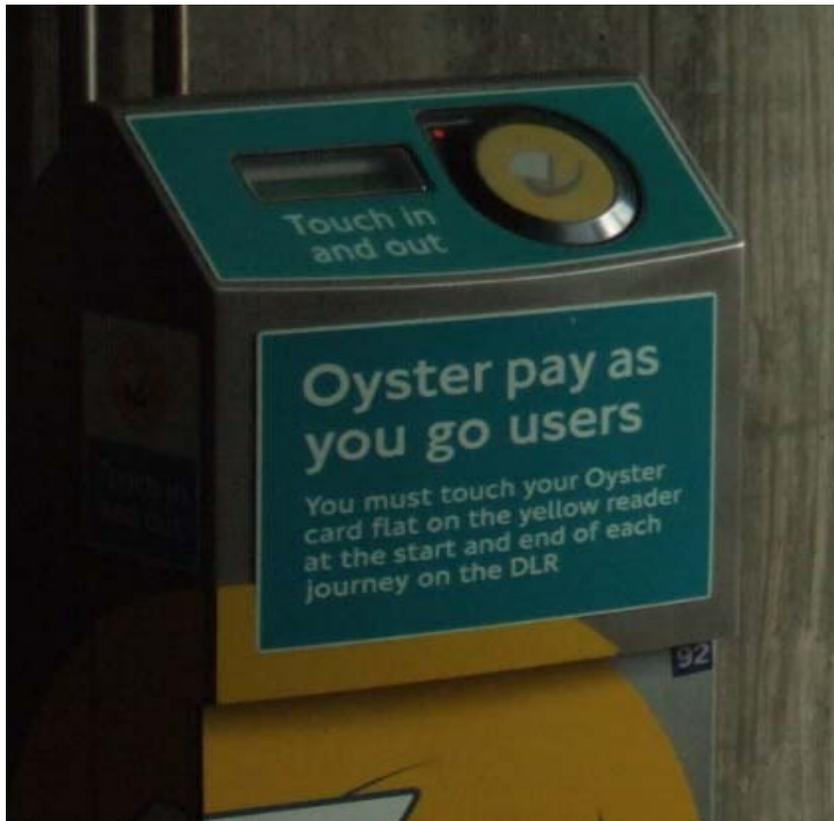
Clearly, this is a significant amount of revenue, although TfL believes that around 60 to 80 per cent of the maximum fares charged would have been raised from customers had their Oyster card been correctly validated. However, the research showed the continuance of such high levels of maximum fares levied was undermining confidence in Oyster and also making passengers feel that Oyster was not delivering the expected value for money fares.

The London TravelWatch research can be found at: -
<http://www.londontravelwatch.org.uk/document/13964>

The principal recommendations relating were:-

- To increase the presence and visibility of card readers;
- To give clearer instructions about where/when to touch in/out;
- To improve signposting/ access to card readers;
- To provide clear information about where Oyster balance information can be obtained;
- Enable all National Rail stations with booking offices within the Oyster area to resolve Oyster related problems; and
- Ticket vending machines need to be replaced to include the ability to view balances, top up and add Oyster products.

To fulfil these recommendations, all standalone card readers should be given vinyls of a similar sort to that employed on the Docklands Light Railway as shown in the picture below:-



Provision of ticketing vending machines at stations without such facilities at present

London TravelWatch is concerned that even in a complex and busy rail network such as London there are still stations where no ticket vending machines are in place. These include places such as Brixton, Maryland, Drayton Green, Castle Bar Park, South Greenford, Angel Road, Crews Hill, Emerson Park, Sudbury & Harrow Road, Sudbury Hill Harrow and Northolt Park within the London Travelcard area, and also stations such as Dunton Green, Bayford, Shoreham (Kent), Iver, Denham Golf Club and others which whilst outside the Travelcard area are served by trains that form part of 'metro' services within the Greater London area. The lack of such facilities not only brings difficulties to passengers when they need to exit or interchange at stations with ticket barriers, but also encourage fare evasion by giving the opportunity to not pay a fare.

Providing ticket vending machines at these locations would enable passengers to buy Oyster products, and help reduce the amount of ticketless travel. .

Ticket machines that do not accept cash

Of great concern to us, has been the decision by First Great Western and London Midland to disable the ability to accept cash at most if not all of their ticket vending machines. Some other train operators also have some stations which do not have a cash facility on the ticket vending machine(s) provided. This has major implications for passengers who do not have access to credit or debit cards, such as those under 16, vulnerable adults by virtue of disability or those who wish to buy a low value fare for which they do not necessarily wish to pay by card. In particular such users may expose themselves to the risk of a Penalty Fare. We believe that it is essential that the cash functionality of ticket vending machines on these routes are restored at the earliest opportunity.

Gating of stations

There are a number of stations on the network that we consider should have ticket gates installed given the volumes of passengers using them (over one million journeys per annum), and the need to reduce ticketless travel and associated crime and disorder. Our experience is that where operators and authorities have taken up our advice on gating, there has been a significant reduction in ticketless travel, ticket irregularities and crime and anti-social behaviour on trains and at stations. In addition, revenue has been increased significantly. However, we would also advise that gating should be undertaken as part of wider strategy for increasing revenue and the accessibility of stations. In particular we would not wish to see the permanent closure of many side entrances to stations. In addition stations that have train services to gated stations should have some form of ticketing issuing facility.

The refranchising of a number of train operations in the London area in the next few years presents a number of opportunities to provide gates and remodel some stations already so equipped to provide better access to the network. These include Tottenham Hale, Elephant & Castle, Denmark Hill, Herne Hill, Finsbury Park, West Ealing, Southall, Hayes & Harlington and the provision of an entrance to Lewisham from the adjacent Tesco superstore and development area.

Providing sufficient capacity

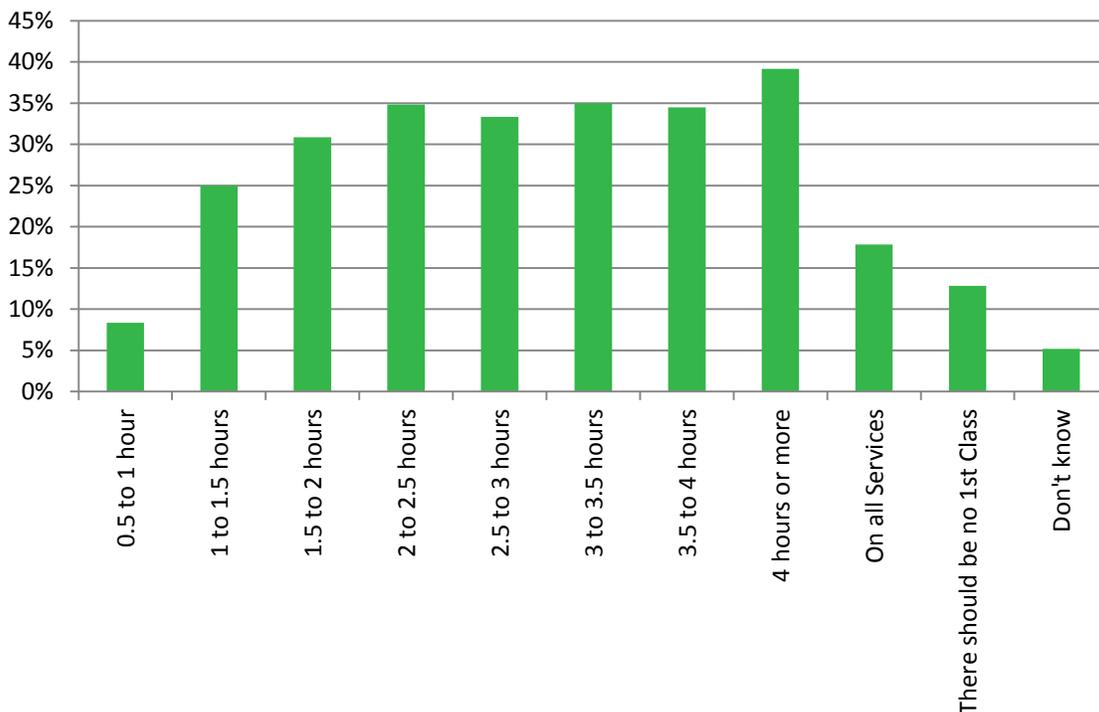
Passengers on many routes in and around London experience high levels of crowding particularly in the peak hours. This can be particularly acute on some of the inner suburban services, and so we would want to see measures to help alleviate this situation. However, our experience is that the use of the fares and ticketing system to ration capacity or redirect passengers to less busy trains varies between the type of journey being undertaken.

In the case of inter city or long distance regional journeys changes to the way in which First Class is provided and marketed could potentially free up capacity and co-incidentally increase passenger satisfaction levels with value for money.

Our evidence for this is the research we conducted in 2010 into passenger attitudes to First Class. This can be found at: <http://www.londontravelwatch.org.uk/document/4222>.

As a result of our findings we recommend that for journeys of less than one hour’s duration consideration is made to declassifying first class accommodation either permanently or on a train by train basis. For journeys of over one hour, we believe that there is considerable scope to persuade passengers to upgrade to first class provided that their expectations are met for this and that they are informed of the benefits and advantages of such an upgrade. Where these recommendations have been implemented by other operators such as East Coast, Virgin Trains and Greater Anglia there has been increased take up of first class on long distance services, and for London based operators such as Southern and First Capital Connect declassification either selectively or permanently has resulted in more capacity being made available to standard class ticket holders.

Graph 2 - Graph of Responses to the Question, 'on which, if any, of the following lengths of journey do you believe first class rail services should be available?'



For more local journeys within the London Oyster Pay As You Go area our research into Oyster incomplete journeys cited above, showed that without transparency of fares or understanding of when peak periods apply that passengers did not respond to price signals about when to travel, and instead simply made journeys at the time that was most convenient for them.

We also note that in the evening peak (1600 to 1900 Monday to Friday) TfL now charges off-peak fares for journeys going into zone 1. This also allows for discounts for railcard holders. However, National Rail operators still charge the full peak rate for such contra peak journeys, with no discount for railcard holders. This means that in some cases paper tickets are cheaper than Oyster, and at stations where no ticket gates are present it encourages fare evasion. In addition where alternative TfL services are available it encourages passengers to divert to these. We recommend that National Rail operators should adopt TfL practice and apply off-peak fares for journeys going into zone 1 at these times.

Similarly on journeys between 1600 and 1900 on Mondays to Fridays railcard holders get no discount on any Oyster products. However, on National Rail a railcard discount applies to paper tickets making single paper tickets cheaper than Oyster. We recommend that both TfL and National Rail operators should allow railcard discounts on Oyster pay as you go fares between 1600 and 1900 Monday to Friday. This would help reduce queuing times at ticket offices and discourage casual fare evasion.

In the interests of reducing the amount of paper tickets issued, fare evasion and queuing times at ticket offices at peak times we recommend that National Rail practices should be brought in line with that of TfL.

Consultation specific questions

Chapter 1 : Principles of fares and ticketing regulation

London TravelWatch's view is that the objectives of fares regulation are about right and we would not seek a change to these, as these generally achieve their objectives. However, we would note that in a complex system such as operates at the moment some outcomes that do not work necessarily for the passenger do occur. An example of this is the way in which two operators might set individual fare flows, but when a through fare is calculated it might be greater than the sum of the two local flows. We believe that there ought to be a method of calculating such fares (concatenation) which would enable the passenger to benefit from a cheaper through fare.

Chapter 2 : Smart ticketing and season tickets

Broadly we agree with the benefits of smart ticketing and the associated risks that you have identified. However, we would strongly recommend that the DfT takes note of the experience of the operation of Oyster in London, and in particular to our research on incomplete journeys which also highlighted other areas of concern to users. This can be found at:-

<http://www.londontravelwatch.org.uk/document/13964>

Smart ticketing could without an interoperable centrally controlled system become a potentially very difficult and confusing system for passengers to understand and use.

We are concerned that the DfT's South East Flexible Ticketing (SEFT) project is not focused on the identified and felt needs of passengers. For example, areas such as Dartford, Redhill, Dorking, Slough, Staines, Sunbury, Esher, Epsom, Potters Bar and Waltham Cross are extensively served by TfL bus services, but the rail stations in the area are not equipped with Oyster. The presence of the bus services mean that most public transport users in the area already have an Oyster card, and the lack of Oyster on the rail service is an inconvenience and a disincentive to travel by that means.

Setting up a parallel smartcard in these areas with different systems and protocols would seem to us not to be in the passenger interest, and also would lead to unnecessary cost and complexity for the rail operators concerned. In addition experience of Oyster, has shown that the flexibility of Pay As You Go and Travelcard has led to an overall increase in rail usage compared to the conventional ticketing systems that preceded it. Passengers and stakeholders in these areas tell us that they would like to see the current Oyster range of products extended into their area, rather than have an untried and untested

scheme put in place for no obvious benefit. The SEFT proposal seems to replicate the current paper system, and so the advantages to passengers (as opposed to operators) are not immediately obvious and as it is a so far untested proposition we feel that a much cheaper, more reliable, more publicly and less risky acceptable solution would be an extension of the current Oyster system rather than the completely new product that SEFT proposes.

Season tickets have other issues, which we largely agree with your analysis on. However, we would also point out that the current system encourages and favours long distance commuting because of the taper of fares over distance. This has a profound effect on the choices that people make regarding where to live and how to reach their places of work and education, but also on the provision of railway capacity, such that there is a perceived bias against shorter distance journeys. Where such capacity is limited there are a number of instances where local passengers within London have been / are not provided with services on the grounds that long distance services have a greater call on available capacity.

A better way to describe a smart, flexible, tailored season ticket would be that of a discount ticket that gives incentives by time of day or day within the week, and which reflects the number and value of journeys made. Many tickets are already available in discounted form, but are not actually taken up because the benefits are not explained to passengers or they are not marketed. For example only 15% of Annual Gold Card holders according to information released by TfL under Freedom of Information requests have registered for discounted off-peak Oyster Pay As You Go fares, with over 28,000 journeys per month being charged full fares when a lower fare would have been applicable. Similarly, outside of TfL type products we feel that there is likely to be significant scope for passengers to take up more existing discounted products.

London TravelWatch would support the use of more time and day specific fares and season tickets provided that there is sufficient flexibility for passengers to be able to vary their journey if necessary, and that the cost of a cheaper ticket could be used towards the cost of a more expensive ticket (as suggested by Passenger Focus's report 'Ticket to Ride? May 2012) without the passenger being penalised for a change of travel time or day.

Chapter 3 Using fares to achieve more efficient use of rail capacity

London TravelWatch agrees that measures to publicise trains which are overcrowded is one way to encourage spreading of passengers to other less busy services. In addition, many passengers may be making sub-optimal choices in their journey pattern either through ignorance or inertia ('Because I have always travelled this route'), which may exacerbate crowding issues. We therefore think that there is a case for encouraging regular commuters and other

less frequent travellers to be encouraged to regularly re-plan their journeys to find out whether the journey they make is still the most efficient in terms of time and cost. In the case of London, the development of orbital rail networks, has the potential to release significant capacity on radial routes and to reduce crowding thereon. Investment in further interchange stations and facilities at locations such as West Hampstead (Chiltern Lines), Brixton (South London Lines), Brockley (Lewisham – Nunhead line) and others would enhance these benefits, as would the introduction of additional stops in long distance services at Clapham Junction, Stratford and West Hampstead Thameslink.

However, one of the principal causes of such overcrowding can be late or cancelled services. Running a reliable, robust and consistent service is therefore a key attribute of reducing the potential for crowding.

A disadvantage of the current Season Ticket structure, (and a potential risk to new commuter fares) is that contra-flow peak fares are charged at the same rate as the peak with the flow rate. This makes rail potentially uncompetitive with other alternative modes of travel and restricts the potential for earnings on stock and staff movements which have to be made to provide peak with the flow journeys, but which otherwise would operate empty and without earning any contributions to costs. There have been some notable attempts to encourage these markets e.g. WAGN introduced contra flow season tickets from Finsbury Park to Welwyn Garden City/Hatfield, Stevenage/Hitchin and Cambridge, using magnetic stripe paper tickets: However, these have been gradually reduced in availability in recent years due to the limitations of the technology and the potential for fraud and misuse on with the flow peak journeys.

Therefore any new commuter fares structure would need the use of more modern ticketing technology to overcome these limitations.

On inter city services, the current use of advance fare restrictions often negate the benefits of frequent services by effectively restricting passengers to one service. An example of this is the Manchester – London service. A better way of managing capacity and giving benefits to passengers, would be to adopt the principles used for advance purchase tickets during the 2012 Olympic Games whereby advance purchase tickets are valid on a 'band' of timed departures rather than one specific service.

Chapter 4 ; Fares and ticketing complexities.

As noted above we would support a move towards allowing advance fare passengers to count the cost of an advance fare towards the cost of travelling on a different service. Similarly, we would support the use of 'banded' rather than specific timed advance purchase tickets on inter city routes with frequent services. Both these elements we consider would assist in reducing ticketing

complexity and be seen by passengers to be a 'fairer' means of operation – and as such would likely to influence their 'value for money' perception of rail fares. We would support any review of the balance of fares between London and other parts of the country. However, it should be noted that travel is a 'market' which will have greater or lesser demand depending on the customer proposition, and the time and day of operation: and that operating costs can similarly vary. It could be said that it is better to collect a marginal fare on a marginal cost operation than to collect no fare at all.

London TravelWatch believes that rail fares data should be an open data set. This will potentially maximise consumer benefits in terms of obtaining the cheapest fares, but also encourage train operators to become more competitive both within the industry and against other forms of transport. An example of this might be to encourage operators to use 'concatenation' to calculate through fares rather than passengers discover that purchasing a combination of tickets might produce a cheaper fare. However, there would need to be some regulation of the activity by either the DfT or probably more appropriately the Office of Rail Regulation to ensure that passengers were presented with information in a common, clear and concise format.

Chapter 5 : Buying tickets

We know that consumers value the presence of staff on trains and at stations, both in terms of security and being able to access information. However, the current Ticketing and Settlement Agreement is the only regulatory framework that can ensure that staff with certain duties i.e. ticket clerks, can be guaranteed at stations at specific times.

A better system which would deliver what passengers want would be to have a regulatory agreement covering all types of station staff activity not just ticketing. Station staff should also become more capable of conducting a variety of different roles on the station, and be encouraged to interact with passengers. This could be potentially more cost effective than the current separate roles that staff often perform at the moment.

More widespread availability and usability of Ticket Vending Machines would be welcome, particularly at stations where such facilities do not exist at the moment. As noted above, we find it extraordinary that many stations even in the London area do not have these facilities as a basic minimum.

Ticket Vending Machines could be more versatile in the range of tickets offered. London Underground has for example been able to add a feature to their machines that allows them to sell extension tickets as well as from ticket offices. In addition, we would like to see action to address the problems associated with 'Ticket on Departure' facilities on ticket vending machines for tickets ordered via

the internet. We believe that the current practice whereby some operators do not take responsibility for correcting or sorting out issues related to tickets purchased through third party retailers is not acceptable.

We would welcome the idea of extending the range of outlets from which tickets could be purchased, subject to appropriate training and incentives to retailers to sell the correct and best value tickets for the journeys passengers wish to make. We are concerned however, that proposals to expand the 'MtoGo' concept could mean that queuing times for tickets might be extended.

Chapter 6 : Next steps

As noted above, we have a number of concerns that existing practices regarding the use of card only ticket vending machines, and the lack of ticket vending machines at certain stations discriminate against people on low incomes and those without access to credit or debit cards by reason of status, age or disability.

Any changes to fares and ticketing arrangements must take full account of the needs of these individuals and ensure that they not unduly penalised by any changes introduced as a result of this paper.

Appendix A – Glossary

Term	Definition
DfT	Department for Transport
NPS	National Passenger Survey
ORR	Office of Rail Regulation
TfL	Transport for London
WAGN	West Anglia Great Northern

Appendix B – suggested redefinition of London Terminals

Route	Terminals to be valid to
Southeastern Lines	London Bridge, Cannon Street, Waterloo East, Charing Cross, Waterloo, Victoria, Shoreditch High Street, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St. Pancras International
Southeastern High Speed Line	As above but also including Liverpool Street and Fenchurch Street
Southern / Thameslink South	London Bridge, Cannon Street, Waterloo East, Charing Cross, Waterloo, Victoria, Shoreditch High Street, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St. Pancras International
South West Main Line	London Bridge, Cannon Street, Waterloo East, Charing Cross, Waterloo, Victoria, Shoreditch High Street, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St. Pancras International
South West Trains 'Windsor Lines'	London Bridge, Cannon Street, Waterloo East, Charing Cross, Waterloo, Victoria, Paddington, Euston,

	Moorgate, Old Street, Shoreditch High Street, Liverpool Street, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St. Pancras International
Great Western	Paddington, Waterloo, Victoria, London Bridge, Cannon Street, Waterloo East, Charing Cross, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St.Pancras International
Chiltern	Marylebone and Paddington
West Coast Main Line	Euston, Waterloo, Victoria, London Bridge, Cannon Street, Waterloo East, Charing Cross, Moorgate, Old Street, Liverpool Street, Shoreditch High Street, Blackfriars, Elephant & Castle, City Thameslink, Farringdon and St.Pancras International
Midland Main Line	St.Pancras International, Farringdon, City Thameslink, Blackfriars, Elephant & Castle, London Bridge, Cannon Street, Waterloo East, Charing Cross, Euston, Kings Cross, Old Street, Moorgate, Shoreditch High Street, Liverpool Street, Victoria and Waterloo
Great Northern Lines	Kings Cross, St.Pancras International, Farringdon, City Thameslink, Blackfriars, Elephant & Castle, London Bridge, Cannon Street, Waterloo East, Charing Cross, Euston, Kings Cross, Old Street, Moorgate, Shoreditch High Street, Liverpool Street,
Greater Anglia lines	Liverpool Street, Fenchurch Street, Shoreditch High Street, Moorgate, Old Street, Kings Cross and St.Pancras International
Essex Thameside	Fenchurch Street, Liverpool Street, Shoreditch High Street, Moorgate, Old Street, Kings Cross and St.Pancras International