



CONSULTATION RESPONSE FORM

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Company name or organisation (if applicable)	Bus Users UK
If you would like your response or personal details to be treated confidentially please explain why:	

Question 1: for example - Do the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?	Yes	No
Answer 1:		

Question 2: for example - Do any parts of the guidance and/or directions require clarification? If so, please refer to the paragraph number and explain why.	Yes	No
Answer 2:		

Question 3: for example - Are there any aspects of guidance and directions which, as drafted, should not be included? If so, please explain why.	Yes	No
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Answer 3:

Paragraph 31b: the term “VOSA” could usefully be deleted here as Bus Users UK carries out such monitoring exercises in Wales and Scotland and there seems no good reason to name the organising agency as it does not add to the sense of the sentence. Simply stating (It is open to the operator to submit that the monitoring exercise is not representative of the operator’s services as a whole but the burden of proof rests with the operator) would suffice.

In paragraph 39d, the same may apply as this seems to refer to monitoring of punctuality and reliability rather than safety. VOSA could simply be replaced by “the relevant monitoring agency” or specify VOSA and Bus Users UK.

Question 4: for example - <i>Are there other provisions not included in these guidance and directions that should be? If so, please explain what they are.</i>	Yes	No
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Answer 4:

Paragraph 10 would seem to prevent a Traffic Commissioner from refusing to register a service based on previous poor reputé or performance which seems odd. If an operator has previously demonstrated themselves to be incapable of acceptable performance, surely this could be taken into account?

Paragraph 17 shows sanctions can be applied, but it appears that once the sanction period ends, the record is wiped clean. Could there perhaps be a 'probationary' registration, with regular compliance monitoring for a period if an apparently rehabilitated operator reapplies for a service? Traffic Commissioners should surely be allowed to protect the travelling public from operators they know to be poor at providing a service by refusing a registration for repeat offenders..

Also, there are several instances of bus services being deregistered as a result of the outcome of a PI and the same service being re-registered by another close family member which is clearly going to be run by the previous failed operator. It would be helpful for Traffic Commissioners to be able to hold an investigation into such cases prior to accepting their registrations and some kind of monitoring put in place if approval is given, so that passengers (and competing operators) are not continually disrupted by such companies.

Paragraph 13 re timing points allows for these stops to be unmarked but the timetables to show them clearly. Timetables already show them but there is no information about what the points mean and most passengers assume it's just a summary of the route taken by the bus. From a passenger perspective, it would be useful to have all timing points clearly marked as such, with a very brief explanation of what this means and what leeway exists for early or late running. This would not only be useful for the average passenger but also help drivers who are having to speed up, slow down or stop so as not to arrive unacceptably late or early and potentially diminish complaints about buses running 2 minutes late. The on-bus timetable should also display this information. We know that there can be confusion over timing points that are not clearly defined in the service registration, and this can lead to inaccurate monitoring. We would be anxious to see greater transparency in defining and identifying timing points.

Paragraph 18c allows for the provision of free or reduced cost travel which allows for a level of inventiveness in the sanctions applied to operators. However, it can also cause a drop in patronage of other, competing services which may lead to an unintended drop in the availability of other services if a competitor service becomes unviable as a result so it may be useful to have a requirement for the general impact of such creative solutions to be assessed in the early stages of a sanction period.

Paragraphs 21/22 and 58/59 refers to the requirements of network managers. It would be useful if there could be an additional requirement to ensure that any planned diversions/disruptions to routes are clearly signposted on every affected stop at least one week in advance of the commencement of the disruption to service. This is currently at the discretion of the operator or local authority and often falls between the two and informing passengers would greatly reduce the inconvenience and level of complaints submitted. Unplanned disruptions need to take into account ways of informing passengers as soon as possible, which often doesn't happen at all presently. These requirements may be more readily inserted into Paragraphs 39 or 59 as we agree that keeping customers informed is a key building block of providing a public transport service but that the practice of simply Tweeting about the problem is insufficient. The efficiency and methods used to do so will need to be proportionate to the resources of the operators but this is a good opportunity to show that engaging with their customers at the bus stop itself is not an optional extra.

Paragraphs 42-44 refer to the dropping of the 1 minute early from the window of tolerance. We understand that this might cause frustration among operators but I think it could be stated whether this applies to all stops or timing points only. If the latter, there will still be stops on some routes that buses will leave early to give time for anticipated congestion ahead. This will not help passengers hoping to travel from stops which are not timing points. This is another instance in which it would help to mark the stops as timing points or not.

Paragraph 46, 50 and 51 refer to the difficulties faced by operators in meeting the timeliness requirement. It should be feasible to allow for re-timetabling of a route if, despite best efforts, unanticipated practicalities mean the services become very hard to run on time, in order that passengers know what to expect, with Traffic Commissioners allowing for variations as per paragraphs 55 and 57.

Question 5: for example - <i>Are there aspects of these Guidance and Directions which seem likely to increase your financial or administrative burdens? If so please explain what they are and, if relevant, what changes would reduce the increase.</i>	Yes	No
Answer 5: 		

Please send your completed form to: sstcconsultations@otc.gsi.gov.uk or by post to:

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Stone Cross Lane North
Golborne
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Please ensure that if you submit your response by post it is clearly marked for the attention of Corrina Bielby.

The deadline for responses is: 13th November 2013