CrossCountry
5th Floor, Cannon House
18 Priory Queensway
Birmingham B4 6BS
crosscountrytrains.co.uk

crosscountry

Office of Rail and Road
2nd Floor
One Kemble Street
London WC2B 4AN

9 October 2015

Dear   ,

System operation: A consultation on making better use of the railway network

Thank you for the opportunity to comment on the above consultation. This letter comprises the Arriva UK Trains (AUKT) response and should be read in conjunction with both the ATOC and Rail Delivery Group responses. Having had sight of those two in draft format, AUKT has tried to avoid duplication; specific points we wish to raise outwith those responses are detailed below.

We wish to make it clear that until the Rail Regulator consultation is concluded and a final position on system operation in GB rail is reached, AUKT does not believe it is realistic or constructive for Network Rail to undertake detailed work on establishing the System Operator dashboard. That workstream should be paused until this one is concluded.

Question 1: What are your views on the functions we have mapped out, and their ability to facilitate delivery of the system operation outcomes? Do you think we have missed any key functions of system operation?

The system functions, as illustrated in Figure 7 on page 14, are logical. Less clear however, is the reasoning underpinning the allocation of activities to organisations other than Network Rail and there appears to be some confusion between the system operator function, as enabling the smooth functioning of the live railway, and the activities that themselves comprise the smooth functioning of the live railway.

Figure 7 may be (mostly; notably operators are not mentioned as potential funders of changes to the Network – both Chiltern and Alliance have either funded or propose to fund changes to the Network in either CP5 or CP6) a description of how the industry organises system operation at the moment, but should be an illustration of what the rail network "operated effectively as a system" (page 5) ought to look like. A RACI matrix would be useful in aiding this, providing a clear picture of who leads per system function.

It is AUKT's view that if the System Operator *as a single entity* manages an appropriate, co-ordinated framework of functions, resourced appropriately with trained personnel then the day-to-day activities, such as incident responses and signalling regulation in real time, should happen efficiently. Box 1 on page 16 is a good example: it contains seven illustrations of good system operation outcomes, such as "continued safe operation of the railway". It is our view that the

Part of Arriva – a [DB] company

INVESTORS IN PEOPLE | Silver

System Operator achieves this by putting in place appropriate standards and systems that the operational staff can adhere to and enact. It is incidental that most of the UK rail industry the signallers, systems and standards work for and belong to the same organisation. However, this is not an intrinsic requirement and is not the case for the Tyne and Wear Metro which works very effectively with a different split of responsibilities. This is the same principle as outlined earlier in the consultation document; the System Operator recommends enhancements to achieve certain outcomes but is not responsible for funding and building them.

Additionally, it is our consideration that once the problem statement considered to be addressed by the potential establishment of a System Operator is appropriately defined, with clear outcomes and functions assigned to Network Rail and other bodies, then the Key Performance Indicators and dashboard, concurrently being consulted by Network Rail, will be more readily able to be defined and be meaningful in terms of enabling and measuring improvement in system operation. This is illustrated below using reordered, reworded outputs from Box 1.

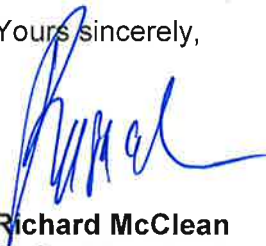| System operation outcome	Current SO location	Type	Possible measure of success
Services that better meet passenger and freight customer demand, including those that facilitate 'network benefits' and those that coordinate between different routes and different modes of transport	Strategic planning and systems in Milton Keynes and per Route; research	All of the below	E.g. passenger crowding; measure of accommodated train paths vs. those requested, etc.
Whole system view of investment in capacity and technology to enable lower network costs in the long term	Strategic planning and systems in Milton Keynes and per Route	Framework and technology management /innovation	E.g. measure of investment/delivery/savings?
More transparency around what taxpayer and user money is buying	Network Rail publications; process for publishing outputs of long term plan/advice to funders	Framework	Number of agreed publications issued on website, to deadlines.
Good understanding of capacity constraints and therefore better investment decisions	Planning framework and training/capacity/resource plan at MK	Framework, technology and training	E.g. declarations of congested infrastructure; actual released capacity (additional paths); use of contractual flex per timetable, etc.
Appropriate balance between access for running train services with access for engineering activities, to ensure reliable infrastructure	Network Rail Route and Capacity Planning	Framework and training	E.g. late notice possession requests; projects delivered on time; additional paths accommodated, etc.

and to enhance its capacity and capability			
Continued safe operation of the railway	Operational standards and safety systems	Policies and framework	Per existing metrics
Appropriate management of unplanned events and incidents on the network	Operational standards and safety systems	Policies and framework	Per existing metrics

Finally, there seems to be some confusion between advisory functions and activities; we would suggest that in Figure 7 the concept of "pick[ing] projects for changes to the network" needs further work to untangle the role of the system operator (advisory; offering a range of options with a guide as to which ones would achieve certain outputs and the likely trade-offs that need making) and the role of the funder (a choice from the range; mandating or contracting someone else to build it with support from the system operator).

4. *Do you have any views on what the desired outcomes and functions associated with system operation might mean for the regulation and incentivisation of network system operation?*

It is AUKT's view that this question is slightly premature when the existential questions surrounding network system operation remain unresolved. Once an agreed industry position has been reached we look forward to commenting on this issue.

Yours sincerely,

Richard McClean
Arriva Planning Improvement Network Sponsor