

27 September 2012

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Dear Chris,

Network Rail's Output Framework for 2014-19

Thank you for the opportunity to comment upon the consultation on Network Rail's Output Framework for 2014-19.

This letter draws together the response of FirstGroup and all of its rail operations: First Great Western, First Capital Connect, First TransPennine Express, First ScotRail and First Hull Trains.

FirstGroup agrees with many of the points raised by ATOC in their reply to the consultation on the above and we do not wish to repeat any of their comments but we do wish to re-iterate some of the key themes.

We are concerned that the framework needs to be proportionate and clear in both its objectives and accountabilities. We do not believe in collecting data for its own sake and that any output and/or incentive obligations must be firmly aligned to train operator and funders requirements.

In our view the need for effective regulation through the output framework must be balanced against increasing complexity or conflicts with existing obligations and any output must have a meaningful role in regulating Network Rail's activities and incentivising the right behaviours.

As far as the individual questions are concerned, we see difficulties in condition monitoring of certain assets at a high level, such as depots, when they are in different parts of their life cycle and these would be best served by being monitored through indicators (such as life remaining) rather than through outputs.

We do not see the value in introducing new indicators, such as changes in journey times, connectivity or accessibility to stations. Changes to these and other proposed indicators depend on actions of others, not primarily those of the infrastructure manager and it is important that the infrastructure manager is not burdened with the collection of data over which it has no real control. We do not see the value in adding additional cost into the industry through introducing a "post office" information role for the infrastructure manager.

Some of the proposed output measures do not have to be investigated via a periodic review and we feel that the ORR needs to work with the industry through existing and emerging structures to identify improvement indicators that add value. We would prefer that the existing CP4 output framework remains intact until any themes of wider industry change (if any) become apparent.

Please do not hesitate to contact me if you would wish to discuss any of the points raised in this response in more detail.

Yours sincerely



Hugh Clancy
Commercial Director, Rail