

Abigail Grenfall  
Manager  
Licensing and Network Regulation  
One Kemble Street  
LONDON  
WC2B 4AN

Date 3 June 2011  
Your ref  
Our ref P1/16/CD

Dear Ms Grenfall

**AMENDING LICENCES TO GIVE PASSENGERS THE INFORMATION THEY NEED  
TO PLAN AND MAKE JOURNEYS; ORR CONSULTATION**

I am pleased to submit below comments by the City of Edinburgh Council in response to the ORR's consultation.

The Council recognises the outline of railway information set out in the consultation document. Indeed, surveys indicate that it is one of the rail industry's major weaknesses as far as passengers are concerned. In particular, information during service disruption is considered poor.

However, the consultation focuses on amending operator and network licences as a remedy. This suggests a view that as long as the organisation is sorted out, the problem will be resolved. We are not convinced that this will deliver the type and quality of information that passengers need.

The document does not analyse what and why information is inadequate. At times it suggests that inadequate information results simply from confused lines of responsibility.

The document thus constantly refers to the need for good quality information without giving any indication of what good information is, or looks like.

**Dave Anderson, Director, City Development**  
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Paragraph 2 states that: 'It is essential that (train service) information is, as far as possible, consistent and accurate across these media and is provided in a timely manner. This principle applies to normal services as well as to any planned or unplanned changes to those services.'

Clearly information needs to be consistent, accurate, and timely (presumably this means up to date). However, it also needs to be relevant, appropriate, and well-presented; but the consultation document omits this.

Paragraph 8 implies that quality is the same as accuracy. However, whilst it is not possible for inaccurate information to be high quality, it is possible to be accurate but poor quality.

Paragraph 26 refers to introducing a purpose for passenger licence holders to produce appropriate, accurate and timely information. This is the first reference to appropriate information. 'Accurate' can be easily defined and measured. 'Timely' can be slightly less easily defined and measured (perhaps setting out timescales and maximum delays in updating information would suffice). 'Appropriate', however, requires much more detail than the consultation document gives.

We would expect 'Condition 2: Information for passengers' to address these issues in much greater detail, but it does not.

To illustrate the issue, and to suggest the areas which the ORR could address in order to fill these gaps, we would highlight the need for information to reflect the passenger's needs, not the operator's. In particular, this means requiring that:

- Information must reflect the total network, not just those services provided by the operator.
- Branding (operator self-promotion/advertising) must not be confused with information.

Our response to the specific consultation questions is therefore set out below, but clearly prefaced by a statement that these are not really the relevant questions.

1. Do you agree that there is a lack of clear accountability in the current framework for providing information to passengers?  
Yes.
2. Do you agree that licences are the best place to set out aligned accountabilities for providing information?  
Probably.
3. Do you agree the split of responsibilities described is sensible?  
Yes.
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?  
Yes. See comments set out above.

5. Do you have any suggestions to improve the proposed licence drafting?  
The proposed licence should address the issues set out in the document and those set out above
6. Who do you think should be covered by these proposals?  
We believe that the consultation document covers all of the relevant parties
7. What impact do you think these proposals would have?  
Unless the proposals are extended to address the issues set out above, they are likely to have limited impact; because they are focussed on organisation rather than output (i.e. what actually reaches the passenger).
8. What extra information about how these conditions would work in practice would be useful?  
Substantial additional information is required to meet the needs we have identified. It might involve a document similar to those, for example, setting out standards for meeting disabled people's needs.

As noted above, there also needs to be a formula to ensure that information about services provided by other operators is given equal or adequate prominence in any operator-produced media.

If you have any queries, please contact Chris Day on 0131 469 3568 or email [chris.day@edinburgh.gov.uk](mailto:chris.day@edinburgh.gov.uk).

Yours sincerely



**Ewan Kennedy**  
**Policy and Planning Manager**