

*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?*

In the short term, yes. In the long run, however, a requirement to provide all the necessary information should be set out in legislation.

*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?*

Timetable, fares and departure information are provided for the benefit of the travelling public, not for the benefit of the operators. Such information, therefore, should be freely available to all passengers and potential passengers. At the moment, the TOCs exercise their intellectual property rights in this material in a way which places barriers between it and users.

There should, therefore, be a licence requirement that all timetable, fares and departure information should be published electronically under a suitable licence which permits redistribution without charge. The terms of this licence should be equivalent to the existing Open Government licence.

This would allow third party suppliers to publish timetable, fares and departure information in a manner most suitable to their users.

*5. Do you have any suggestions to improve the proposed licence drafting?*

The licence should include a clause explicitly compelling TOCs and Network Rail to release all passenger-facing travel data under a suitable licence, as above.

*6. Who do you think should be covered by these proposals?*

All operators of scheduled services over Network Rail tracks.

*7. What impact do you think these proposals would have?*

Any improvement to the availability of travel data would make it easier for passengers to obtain the information then need in order to plan a journey, and would enable third party suppliers to

provide that data in ways which better meet the requirements of the travelling public.

*8. What extra information about how these conditions would work in practice would be useful?*

It would be useful for the ORR to make it clear that it supports the principles of open data as regards passenger-facing travel information.