



The National Archives

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The National Archives, bringing together
the Public Record Office, the Historical
Manuscripts Commission and the Office
of Public Sector Information.

Abigail Grenfell
Manager, Licensing and Network Regulation
Office of Rail Regulation
One Kemble Street
London, WC2B 4AN

8 June 2011

Dear Ms Grenfell

RE: Amending licences to give passengers the information they need to plan and make journeys - a consultation

The National Archives has policy responsibility for the re-use of public sector information. It is in that capacity that we welcome the Office of Rail Regulation's consultation on provision of travel information, and its objective of ensuring the provision of "good quality information about train services to all passengers across all timescales and consistently across all media, before they travel, at point of sale and during their journey."

The consultation represents an opportunity to improve the provision of transport information to the public. In particular, the role of businesses and third sector organisations in providing new information services, products and tools through the re-use of transport information could be expanded. As an illustration of this strategy we note the success of Transport for London and the London Data Store in enabling the development of new transport information services. The continuing publication of data on the Barclays Cycle Hire scheme has enabled private redistributors to cater for the needs of a wider range of customers, for example by producing smartphone applications¹. Similar opportunities are now being taken with the release of transport information from Manchester, and in many other leading European and world cities.²

Assisting third parties to access, develop and re-use transport data would open up several benefits:

- Third parties would provide investment into the development of information services, diffusing the burden from train operating companies and Network Rail.
- In its Big Society agenda government recognises that delivery of public services is sometimes best undertaken by third parties³. In this case train operating companies and Network Rail cannot be expected to be specialists in the development of new media information services. So, organisations which are specialist can contribute to the efficient development of services for a wider, more diverse range user needs.

¹ For example, London Bike for iPhone: <http://itunes.apple.com/gb/app/london-bike/id384046992?mt=8>

² <http://opengovernmentdata.org/data/map/>

³ <http://www.number10.gov.uk/news/speeches-and-transcripts/2010/07/big-society-speech-53572>

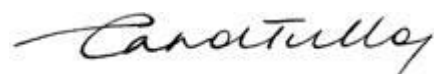


- Competition between providers within the same channels also provides a mechanism to drive up customer service standards and improve responsiveness. For example, we could look at the wide range of applications available to view TV listings information for the Android smartphone market alone⁴.
- Different providers are specialists in different media channels. So, facilitating the re-use of transport data by a variety of third parties would increase the availability of transport information across a wide spectrum of media channels.

The realisation of these benefits depends on the availability of transport information under enabling licence conditions. For instance in the Transport for London example discussed here, data is made available for free commercial re-use within syndication guidelines. This approach fits in with the targeting of SMEs as developers of new information services, since such organisations typically have much valuable time to invest, but often little cash, or are operating non-commercially. The Open Government Licence⁵ is a tested solution for the provision of public data for development purposes. It has been adopted by central government for the distribution of most public sector information. It is being adopted by a growing number of local authorities and other bodies in the wider public sector. In order to more surely obtain the benefits discussed above, The National Archives recommends that ORR reconsider the draft licence amendments regarding acceptable levels of charging (consultation p.15, clause 2.9) and encourage all parties involved, including individual train operating companies and aggregate ventures such as National Rail Enquiries, to offer enabling licence terms and conditions for use and re-use of transport information.

With respect to the point at which data is made available, The National Archives hopes it infers correctly from the consultation document that ORR's proposal is to make this the duty of train operating companies. We note that, currently, the information is aggregated at the level of National Rail Enquiries and the Association of Train Operating Companies. ORR may wish to consider how best to ensure that duties placed on individual companies are carried through into joint activities and organisations. The complexity and time consumption of negotiation with individual train operating companies would likely discourage development of information services by SMEs and third sector providers. This should be considered in the drafting of licence amendments by ORR in order to obtain the potential impacts and benefits of increased third party provision.

Yours sincerely,



Carol Tullo

**Director of Information Policy and Services, The National Archives
Controller of Her Majesty's Stationery Office**

⁴ <https://market.android.com/search?q=uk+tv+guide&so=1&c=apps>

⁵ <http://www.nationalarchives.gov.uk/information-management/uk-gov-licensing-framework.htm>