From: Smartrip Technologies Ltd
To: Abigail Grenfell
Sent: Mon 20/06/2011 21:33
Subject: Amending licences to give passengers the information they need to plan and make journeys - a consultation

Dear madame,

My name is Filip Florek, and I'm Managing Director at Smartrip Technologies Ltd - young ITS company based in Dublin. Starting from last year we are conducting researches on both sides of Irish sea, including industry standard development, multimodal journey planner design and more.

As active member of ITS industry and passengers on daily basis too, we are delighted to provide you our input to your idea.
We believe putting this proposals to life can means a lot for industry, and can create first-class document that can be example for the others.
We strongly support this initiative.

Please follow our comments and proposals below:

1.   Generally, current framework covers many obligations the operators have to fulfil to provide information to passengers. However, this is overall view. The problems are the rules consistency, the split of responsibilities between parties quality of the information and access to data. All parties should provide all necessary information to make journey safe, comfortable and reliable.

We think that the idea to split the responsibilities between parties (it means, data producers, processors and providers) definitely will improve level of the accountability.

But, accountability means also quality and accuracy of the data provided to passengers. We, as an industry have to take care and decide which information is much needed by traveller in specific moment. The data providers have to help travellers to make a choice – this is what the accountability's mean in our opinion. The ideas included in the consultation papers will definitely improve and clarify situation on the market.

2.   Yes, we agree that licences are the best place to set out aligned accountabilities for providing information to passenger. The strongest point of the idea is split of responsibilities.

3.   Yes, we agree that splitting responsibilities between parties is a step forward. We need to be careful in parties' definition. Actually, all parties within industry may have been treated on the same level in terms of responsibility. All parties may have produce, process and publish improved information much needed for passengers.

4.   From our point of view the industry should support more 3rd party companies (like software developers, multimedia broadcasters, and non-profit organisations) and involve them to data sharing process.

5.   (including questions from point 6, and 7 too) No, we do not have any more suggestions to your proposal.

8.   The technical feasibility of the idea concerning us the most. We agree that that licences are the best place to set out aligned accountabilities for providing information to passenger but in the same time licence's obligations should define the technical feasibility of data sharing process (like usage of the common ITS/IT industry standards - in general). It means that information about type of passenger's information, the timeframe to provide data accuracy and quality of the information have to be covered under licence obligations.

In the same time the Code of practice documents will tell operators how to fulfil licence obligations in the best possible way. We need to improve not only the quality of information provided to the end-user but also the way how we (industry) may do this. The code of practice should define in details procedures, industry standards, communication interfaces etc. The document should also support Open Data initiatives.

Please do not hesitate to contact with me if you have any questions or comments.

Best regards
Filip J. Florek

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