

Response to ORR consultation 'Code of practice on retail information – consultation on developing a code', dated 26/9/14

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General comments:

The consultation documents fail to set out as much as is known and can be predicted about new ticket types, new ticket instantiations (such as in smart media), new ticket delivery and use mechanisms, and new customer offerings such as multi-modal ticketing. The documents therefore:

- fail to embrace the *Door-to-Door public policy*,
- fail to cover the entire customer experience when buying *and using* tickets, and
- fail to be, not future proof, but *as far as possible future aware*.

I note here that slide 5 of the slides used at the later Workshop associated with this consultation mentions 'Maximising benefits of smart ticketing'. As with other matters within the scope of Whitehall Depts, the major problem here is the lack of skills in Whitehall. Personnel involved in these areas where technical and policy matters meet must be given task-specific training at front-line, managerial and policy level. I note that Lord Heseltine's report last year on the skills shortage in another Whitehall Dept in relation to Industrial Policy is equally applicable to DfT. It may be appropriate that an uplift in skills at ORR should therefore be provided, along with a partnership with ITSO Ltd on smart media technology, and with others on other new media.

More generally (as in the author's email of 17th November), it was a serious failure to launch this Consultation without benefit of the material from the 20th October Workshop and of the draft code (undated, but received 13 November). In response to receipt of that additional material I forwarded the first full draft (dated 1/2/2005) of an unpublished report of a project for DfT and DCLG assessing many requirements for the deployment of smart media in public transport and other citizen services.

The London Economics document:

That document rightly emphasises the need for TOCs and other ticket sellers to concentrate on what is important to the customer, but, related I believe to the more general failure in scope and content of the present consultation's material, fails to look ahead in an informed manner to changes that are already starting to be delivered. Projects such as SEFT should have been studied before signing off the LE document as part of the consultation material, and the DfT mandate for smart media ticketing in all new rail franchise agreements should have been taken into account (and a summary of that mandate provided in the consultation documents). In addition, the LE study team should have been briefed about smart media ticketing moving into using secure smartphones as the ticket carrier¹, essential if the passenger is going to be able to see ticket information and journey management data

¹ ITSO Ltd is currently assessing the security of at least 2 such developments.

(e.g. seat reservations) issued in smart media² – the Code, and background rules for equipment and systems type approval, need to cover that.

A note on the topic of ‘what is important to the customer’:

The industry (ATOC, TOCs and other ticket retailers) should be required to develop a professional attitude akin to that required when designing machine tools or aircraft cockpits: the user has to be encouraged by the design of the ticket sale process, and the content of the ticket and supporting information, to *do it right both when purchasing and also when travelling*. The discipline to be brought to bear is that of *occupational psychology*. But of course we do not in this country make enough use of that discipline when designing roads, so that accidents happen when better design would dramatically reduce their number...

Along with that use of best practice in design of the customer interface there should be a considerably enhanced *type approval scheme*³ for ticket retailing equipment and systems, and an inspection regime to ensure that equipment is correctly installed and maintained. An example of the failure to implement that is the touch screen TVMs installed in the old open ended shed at Bristol Temple Meads: on even moderately cold days the touch screens frequently do not reliably detect finger presses. There are of course many stations where TVMs are installed out in the open...

Ticket types:

A recent example of a ticket and associated journey indicates that there is too much complexity, and that both information provided by a particular online seller and information printed on the current generation of mag stripe tickets are likely to be incomplete – but the mag stripe tickets do not have room for all of the information (not even the new design recently publicised). The example is:

A ticket purchased online for an early evening weekday journey involving one change of train. When purchasing the ticket I had selected a particular train time. Detail information about validity was not provided by the web site. Both the web site and the ticket coupon as printed described the ticket as ‘Super Off-Peak Single’, a type that I had not seen before. Arriving unexpectedly early at the station and finding the ticket office not busy, I asked if I could use the ticket on an earlier train (an hour earlier than the one originally selected). The member of staff thought a little and then told me ‘yes’, followed by telling me that the number of ticket types had increased in such a way (from around 60 to around 100) that it was difficult to keep track of all of them. I went through a gate at that station without any problem, took the earlier train and did not have any problem when my ticket was checked...

I note here that slide 4 of the slides used at the Workshop associated with this consultation mentions ‘reducing complexity of fares & ticketing systems’...

² The MultiPass self powered smart media device should also have been referred to.

³ The rail ticketing type approval process should be merged with ITSO equipment certification