

[REDACTED]

Non-confidential summary:

- We remain concerned that the commercial arrangements for access to RTTI remain above those that would exist in a regular competitive market
- We believe the Network Rail data provides some good opportunities for app development, however we believe that it is not possible to offer the full service offered by Darwin without the use of data feeds/data inputs not currently available.
- We believe that given the range of free apps available live departure information will no longer sustain a paid-for app market, nor do we believe advertising revenues would be sufficient to cover the licence fees.
- We believe that a more open standard, particularly licence flexibility, would allow more innovative products beyond the standard “live departure board” offerings available today.
- We believe that if viable alternatives to Darwin are to be developed, that there needs to be a commitment to ensuring all the data sources available to Darwin are equally available to others, including the data input directly into Darwin, and that publishing “best practice guides” for predictive modelling would mitigate against multiple versions of the truth.