

Philip Willcox
Office of Rail Regulation
One Kemble Street
London WC2B 4AN

Our Ref:
Your Ref:

18th October 2012

Dear Philip,

ORR's approach to transparency - consultation response

Thank you for inviting us to respond to your recent consultation and meeting on this subject.

This reply complements the response made by on behalf of ourselves and Passenger Focus by John Cartledge on the issues related to safety (questions 3 and 4). We also note Passenger Focus's formal response of the 20th September 2012.

In general London TravelWatch has been very supportive of the ORR's approach to transparency, and indeed the ORR has always set a very high standard in this regard, which this consultation builds upon. We also believe that it is right to encourage the rail industry to be more transparent and open in its activities, enabling greater scrutiny, but also greater passenger and public confidence that it is operating in the public interest.

We would be interested in attending a seminar on the benefits and challenges of delivering transparency as this is an area where we have some experience.

We have noted in other correspondence our concerns relating to the accuracy of the station usage statistics that the ORR produces. The usage of these statistics in decision making by a variety of bodies can and has had profound effects on decision making, and so the accuracy of these statistics is of particular importance.

We do use the National Rail Trends Portal, which although useful, could be made more easy to use and navigate.

We would support in principle the potential use of Network Rail historic performance data; however, as with all data, there needs to be a clear explanation of the methods used in its collection, its original purpose and when and where changes would have affected the final result.

Yours sincerely

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Director, Policy and Investigation

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