

## Response from Jonathan Raper, CEO, Placir Ltd. to ORR consultation on Transparency

Q1: We would like to hear consultees' views on the content and functionality of the NRT Portal

The NRT portal is extremely important as a commitment by ORR to release statistical data on the rail industry and needs to be maintained and extended. However, by the standards of journalism and academia the NRT is extremely poor at presenting information and the usage is quite low given the number of travelers who use Rail in Britain. ORR should be aspiring to the quality of visualisation achieved by the Guardian Data Blog

<http://www.guardian.co.uk/news/datablog>

It is welcome that the data is published as Excel files rather than PDFs, but there is no (obvious) way to download all of the data at once. NRT does not publishing its data as a feed or through a machine-readable API so it is very difficult for developers to create applications from this data. This limited approach to publication will inhibit the re-use of the data that is being published.

Q2: We are interested to hear views on what other areas of our work consultees believe should be published and why.

It seems to us that the current publication of punctuality information still do not meet the aspiration of travelers, as aggregated data at 'sub-operator' level does not match their journey experience. There is a need for individual train service punctuality so that travelers can know how punctual their regular train is (§3.26).

We are dismayed by the amount of time that it has taken to review the 'NRE's Code of Practice for access to the real time train information database'. It is unacceptable that this matter should have been allowed to lie unresolved for 2 years. At the time when the licence review was announced in 2011 the NRE database was the only source of rail data outside the industry and NRE held a monopoly position. NRE abused their monopoly over this information by writing their own very restrictive Code of Practice for access that gave them arbitrary powers over the nature and objectives of organisations wanting access, and they charged a very high price for the information. Therefore, we profoundly disagreed with the conclusions of the 2009-2010 competition investigation and the failure to subsequently review and reform this code has been a real failure of regulation.

In the meantime Network Rail have released their own upstream feeds of timetable and real time departure information and NRE have lost their monopoly. The Code of Practice is now an anomaly as NRE are now a private sector dominant provider not a monopoly industry source. Although NRE's database is still the most comprehensive in the industry, third party re-users of the NR data feeds will match NRE within the next year and take much of their market share for data provision as they will not apply monopoly pricing. In this light the continued need for a Code of Practice is questionable.

Q3: We would be interested to hear consultees' views on our proposals around the publication of the results from our safety inspections and reports on the comparative performance of duty holders from our audit and inspection activities.

We would welcome the further publication of this data as a feed that could be re-used by third parties.

Q4: We would also be interested to hear views on the benefits and otherwise of duty holders reporting on best practice by the publication of specific KPIs.

We would welcome the further publication of this data as a feed that could be re-used by third parties.

Q5: We would be interested to hear consultees' views as to the potential use that could be made of Network Rail historic performance data. In particular the extent to which this data provides a means by which the market, via third party developers, could meet consumer demand for real time train information products and services and/or information about performance at even more disaggregation than the current route sector publication.

Placr is intending to record the real-time train departure information to produce historic data on performance from which we can produce alternative indicators on punctuality at any level of aggregation.

Q6: In what areas of its business could Network Rail, in your view, become more open, and what information or data would you like to see made available as a result?

We would like to see the information held on National Rail websites about stations published e.g. <http://www.nationalrail.co.uk/stations/sjp/HNH/stationOverview.xhtml> as this is still copyrighted

Q7: We are interested in hearing views on the scope of our and industry activities; whether the sector is moving in the right direction; whether the pace is right; and whether there are other areas that consultees believe would benefit from greater transparency and why

Placr believes that Rail Settlement Plan's data charges are a restraint of trade over those that would like to analyse rail fare options, develop alternative routings and enter the market as ticket sellers. We believe that RSP should be moved out of the control of ATOC and developed into a non-profit company that would support and possibly kite-mark any company wishing to become a ticket reseller.

Q8: We are interested in consultees' views on the use of our statutory powers and how they believe they could be applied in the context of transparency.

No response

Q9: Presentation of the data or information is key and we would like to hear views as to the likely risks and pitfalls and how best to address them.

We believe that the only effective way to ensure re-use of industry data is to make it available as a machine-readable API that developers can use to create apps and web services from the data. Allowing third parties to explore and present the data is the best way to engage travelers, press and politicians.

Q10: We would be interested to hear of any other initiatives in the sector or elsewhere where transparency has resulted in positive change.

The case study about TfL transparency does a good job of outlining the benefits. The national bus information partnership Traveline also offers many examples of transparency best practice for ORR.

Q11: We are also interested in hearing about the risks and any unintended consequences.

No response

Q12: Consultees views are sought on how we should go about evaluating the risks and benefits of more transparency and what factors we should take into account, including how we should measure whether our objectives for transparency are being achieved.

Placr do not believe there are any significant risks to transparency. We live in a pluralistic society capable of debating published data and conclusions drawn from it.

Jonathan Raper

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