

# **CONSULTATION ON THE RENEWAL OF THE PUBLIC TRANSPORT TICKETING SCHEMES BLOCK EXEMPTION IN FEBRUARY 2016**

## **Response from the Association of Train Operating Companies**

### **1 Executive Summary**

ATOC is the trade association for the passenger train operating companies and this response generally reflects the view of our members.

We welcome the opportunity to respond to the consultation. However, as a trade association, we do not have first-hand experience of working with the Public Transport Ticketing Schemes (PTTS) Block Exemption, so our comments are necessarily of a more general nature. It is worth noting that much of the agreement of prices between operators within the rail industry is a legal requirement under regulatory instruments separate from the Block Exemption and therefore outside the scope of this consultation.

Nevertheless, a number of multi-modal products do rely on the Block Exemption continuing, without which their consumer benefits would be lost and the development of new products would be curtailed.

We generally agree with the outcome of the analysis undertaken by the Competition and Markets Authority (CMA) and support its conclusion that the PTTS Block Exemption should be extended for a further ten years. We are particularly keen to see the associated Guidance Document revised to reflect the comments made in the Consultation Document and in this response.

### **2 Introductory Remarks**

Train Operators (TOCs) are obliged by their licence conditions and the terms of their franchises to enter into agreements with one another over a number of aspects of operating rail services, including the setting of prices. Both these instruments are 'legal requirements' for the purposes of the Competition Act 1998; accordingly, this response does not consider setting the price of national rail fares, and related products such as Railcards, by TOCs.

The franchise terms also require TOCs to be party to the Travelcard Agreement and the Through Ticketing (non-Travelcard) Agreement, to which Transport for London (TfL) are also a party. These agreements require, inter alia, the TOCs and TfL to agree the prices of certain products. We also understand, from the consultation document, that TfL are similarly under a 'legal requirement' to enter into multi-operator arrangements by virtue of a mayoral direction under the Greater London Authority Act 1999.

Agreements with bus and light-rail operators to set the prices of multi-operator tickets such as PLUSBUS<sup>1</sup> and products in Passenger Transport Executive (PTE) areas, and some more recent joint TOC-TfL products that do not fall within the scope of the above two agreements, rely on other mechanisms, including the Block Exemption, for protection from Competition Act challenge.

The following sections provide our detailed response, arranged so they broadly correspond with the questions (in some cases grouped together) in the CMA's consultation document.

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<sup>1</sup> This is an add-on option to single and return rail tickets starting and/or finishing at any station where a PLUSBUS scheme exists through the Journey Solutions initiative. See [www.plusbus.info/](http://www.plusbus.info/)

### 3 CMA Questions 1 - 4

1. Do you agree with renewing the Block Exemption? Please explain and provide reasons for your answer.
2. Do you consider the continuation of the Block Exemption to be necessary to deliver integrated ticketing schemes that are beneficial to consumers?
3. Would consumer choice, in particular the variability and suitability of ticketing options, be significantly reduced without the Block Exemption?
4. If the Block Exemption was not renewed how would that influence your operations? Please provide examples and an indication of the likely costs to your business and the potential implications for the transport sector more widely.

There is strong support amongst our members for the renewal of the Block Exemption with nothing removed from the current version, subject to the changes suggested elsewhere in this response. The value of the Block Exemption is in providing legal certainty to TOCs (in conjunction with other transport operators) offering their passengers the benefits of multi-modal tickets. It can also facilitate the creation of superior travel products, though there are some concerns regarding new product development as outlined later. Comments from our members suggest there is considerable interest amongst the public for joint bus/rail products, but such products would be less likely to come to the market without the Block Exemption because the bus industry is seen by train operators to be quite complex and difficult in competition terms. Similarly, if the Block Exemption were not renewed, many schemes, which affect millions of people, would be at risk.

We do not have comprehensive data on the number of multi-modal journeys including rail that are made under schemes relying on the Block Exemption, but the table in the appendix (which is not an exhaustive list) illustrates its scale. Over 55 million such journeys are identified, representing nearly 8% of all identified multi-modal journeys (the others being offered under schemes that are a 'legal requirement'). These journeys represent a significant level of additional customer benefit. However, from a TOC perspective, this is a relatively niche market and TOCs would find it commercially unattractive to develop and offer such products if they had to justify each scheme from first principles under the Competition Act, due to the costs (for example management time and external legal advice) and the risk of challenge.

The remainder of this section of our response provides further evidence in support of the renewal of the block exemption.

#### ***PTE and Similar Schemes***

There are a number of PTE Schemes in which TOCs participate and which bring important consumer and environmental benefits by making public transport more attractive and reducing congestion. By way of case studies, we illustrate the need for the Block Exemption to continue.

In the West Midlands, nNetwork™ products are available on bus, metro and national rail. The card value is divided across the three modes and pricing is developed collectively by representatives of the modes meeting together as the Centrocard Operators' Group and submitting what increase they wish to apply to their element. There needs to be agreement between the operators within each mode (five TOCs in the case of rail) as to what common position their respective representatives will adopt in the Centrocard Operators' Group meeting. Whilst inter-TOC agreement on pricing is permitted insofar as it is a 'legal requirement', the Block Exemption is necessary for setting the final customer price collectively and for the allocation of revenue to operators.

In West Yorkshire, the development and administration of multimodal products is managed by the West Yorkshire Ticketing Company, comprising of representation of bus and rail operators. Key products include the multimodal season ticket (Metrocard), and various day rover tickets. This range of tickets ensures that multimodal ticket products exist to complement integrated ticketing initiatives delivered in conjunction with West Yorkshire Combined Authority. The strategic development of these products requires all participating operators to influence a number of factors, including the implementation of marketing strategies and pricing. As in the previous example relating to the West Midlands, the Block Exemption is required to enable operators to participate in these products, enabling appropriate reimbursement methodologies to be applied to a range of tickets that are developed in a manner intended to support and stimulate public transport usage.

Similar ticketing companies with TOC participation exist in Tyne and Wear (Network Ticketing Limited), Greater Manchester (Greater Manchester Travelcards Limited), and South Yorkshire (Travelmaster Limited). TOCs are also involved in the Merseyside integrated multi-modal ticketing scheme, which unlike the above is managed by Merseytravel, rather than a company comprising of operator representatives. Examples of multimodal schemes involving rail in Scotland include the Strathclyde Travel Partnership and One-Ticket covering Edinburgh and East Central Scotland.

In summary, in all PTE areas, the Block Exemption facilitates the ongoing engagement of all public transport operators in offering multimodal ticketing. Without it, it is likely that passengers would be required to purchase a combination of single mode tickets for journeys involving more than one mode, resulting in greater complexity and significant barrier to travel, and ultimately resulting in public transport becoming less competitive against car travel.

## **PLUSBUS**

By way of background, PLUSBUS has become an important and growing component of the UK integrated transport system. It provides integrated bus-rail ticketing in areas outside Greater London that are not covered by PTEs. However it is sold in PTE areas as well, and in increasing numbers, boosting competition with PTE products.

We consider that the continuation of the Block Exemption is essential for the PLUSBUS Scheme to continue and important customer and environmental benefits would be lost otherwise. As explained below, the Scheme would be impractical to operate unless the bus operators could act collectively and in some cities TOCs directly rely on the Block Exemption to operate the Scheme.

First however, we outline the benefits arising from the Scheme:

- PLUSBUS is a one-day zonal pass in the destination town so offers all the typical benefits of a Multi-Operator Travelcard (MTC) (e.g. time, cost saving and flexibility) over buying separate tickets.
- A further customer benefit arises from PLUSBUS being a rail “add-on”. Customers can buy the product from a much wider range of channels than would typically be the case for bus travel. This includes online sales, which account for 38% of PLUSBUS sales by volume. Furthermore, unlike on-bus transactions, PLUSBUS can be bought using any of the wide range of payment methods offered by train companies, in particular credit/debit cards, which cannot generally be used to buy tickets on-bus.
- PLUSBUS also brings environmental benefits, because rail passengers are more likely to consider bus travel as an option for their onward journey when presented to them as part of the rail transaction.

The reasons why the Block Exemption is essential for PLUSBUS differ according to the type of Scheme as follows:

In some PTE areas, the pricing of PLUSBUS products is determined by the ticketing company (see the section on PTE Schemes above) as part of an overall approach to multimodal travel ticketing. The Block Exemption is thus directly used by TOCs to enable them to participate. Without it, TOCs would be likely to withdraw, rather than allow themselves to be vulnerable to competition challenge (with the resulting cost and effort of defending the arrangement).

Elsewhere, the Block Exemption is needed to allow the bus operators to co-operate on setting a common price for the bus element. (TOCs are not party to those bus price negotiations, and do not seek to be, so do not themselves rely on the block exemption). The scheme works thus: TOCs are given the bus price for each town by the lead bus operator and add it to the normal price of the rail fare. The revenue, less a negotiated sales commission, is handed over to the lead bus operator, who shares it with other participants according to local arrangements.

In the absence of a Block Exemption, TOCs would have to negotiate separate add-on prices with every individual bus operator. Customers would then have to select, at the point of sale, which version they wish to purchase (even though they may have little understanding of the differing bus offerings in the destination town) and would have no flexibility of use on arrival. Clearly, such a product would be impractical for operators to set-up and manage, deeply unattractive to potential customers, and would not be offered.

Finally in this section, it should be noted that there is little financial incentive for TOCs to seek to overcome such practical issues if the Block Exemption were removed. It is unlikely that PLUSBUS generates any incremental rail journeys and TOCs offer PLUSBUS largely for the greater convenience of their passengers.

#### **4 CMA Questions 5 - 7**

5. Have there been any adverse consequences from the application of the Block Exemption? Please provide examples and details.

6. Has the current Block Exemption prevented any developments in the last five years that could have benefited consumers? Please provide details of the proposed development and how the Block Exemption has prevented this.

7. Do you encounter any difficulties in applying the Block Exemption rules? Please explain and provide specific examples.

Two particular issues have come to light as a result of seeking our members' views in preparation for drafting this response.

First, there has been some concern within the rail sector that the Block Exemption only provides legal cover to existing schemes and does not help in the development of new ticketing products. It is unclear whence this concern arises, but the interpretation of Art 9 may be a factor, in that sub-para (1) prohibits exchange of information and the relief given in sub-para (2) applies only where the information is '... directly related and indispensable to the effective operation of that scheme'. It might therefore be argued that discussions around new products do not have the protection of Art 9(2). Another factor creating the impression that the Block Exemption applies only to existing products may arise from confusion around references to the now defunct Retail Trade Practices Act

1976 which we expect will be removed from the revised Guidance Document. The way in which rail revenue is allocated using the ORCATS<sup>2</sup> model (rather than lying where it falls) may also be giving rise to this concern in respect of Multi-Operator Individual Tickets (MIT) and Through Ticket (TT) products. This issue is expanded upon in our response to Question 9 below.

A key instance of this issue concerns the discussions between TOCs and TfL as to the pricing of the London Travelcard and Pay-As-You-Go (PAYG). For Zones 1-6, this is permitted by virtue of the Travelcard Agreement being a 'legal requirement' and participation in the PAYG agreement being mandated through franchise agreements or by a specific Direction from the Department for Transport (DfT) (though Anytime Day Travelcards have to rely on the Block Exemption) – see appendix. However, these two agreements do not extend to products for Zones 7-9 (introduced since the agreements were entered into), so TOC concerns that the Block Exemption does not offer protection result in TfL setting these prices unilaterally.

As such, it would be helpful in providing legal certainty to TOCs and facilitating the further development of similar products if the Block Exemption, or at least the guidance notes, could cite the London Travelcard and PAYG (in both cases across all zones) as specific examples of products whose maintenance and development are covered by the Block Exemption, in much the same way that PLUSBUS is explicitly mentioned.

In a more general sense, we suggest that the Guidance Document should clarify that the aim of the Block Exemption is to provide confidence and legal certainty in the development of new products. It would be helpful to also clarify that the onus is on the promoter of a scheme to self-assess and to emphasise that if there is a clear customer benefit the promoter should feel confident in proceeding.

Second, where a TOC wishes to work with a bus operator from the same owning group to offer a multi modal TT, MIT or MTC, or an add-on, there is currently a risk that, due to the allocation of rail revenue to other TOCs (i.e. as a result of the rail revenue allocation scheme set out in the Ticketing and Settlement Agreement<sup>3</sup>, generally through the use of ORCATS q.v.), this would technically constitute a multi-operator ticket. Consequently, an operator or owning group may consider it necessary or desirable from a risk perspective to structure it in such a way as to comply with the Block Exemption, despite the principal purpose and effect of the ticket being as a single operator product.

This creates additional administrative burdens and may act as a disincentive on operators or owning groups from offering such products, even though they are clearly in the interests of customers and consistent with the desire for seamless integrated travel in urban areas that is a theme in current rail franchise competitions and the devolution debate. For example, the need to adhere to the requirements of the Block Exemption can prevent the smallest scale schemes (through tickets between the last train and connecting buses etc.) being pursued.

Further guidance would be helpful on whether there is an acceptable 'de Minimis' proportion of rail revenue accruing to other TOCs on the given flows, thereby avoiding the need to produce a written

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<sup>2</sup> Operational Research Computerised Allocation of Tickets to Services system which is used to divide up ticket revenue between passenger rail operators. See page 25 of the following webpage for an overview [http://orr.gov.uk/data/assets/pdf\\_file/0016/4633/stn\\_usage\\_report\\_0910.pdf](http://orr.gov.uk/data/assets/pdf_file/0016/4633/stn_usage_report_0910.pdf)

<sup>3</sup> An agreement, which all licensed passenger train operators are obliged to enter into, that inter alia sets out various arrangements between the Operators relating to the carriage of passengers and the retailing of tickets.

agreement or to fulfil the other specific requirements of the Block Exemption in respect of this ticket. We anticipate that this may be achieved through modification to the Guidance Document.

Finally in this section and more generally, the Guidance Document is seen as helpful to an understanding of the Block Exemption though could be further improved in line with the specific suggestions elsewhere in this response. We suggest it could be further enhanced by adding a two-page summary that enables a quick assessment as to whether a particular scheme needs reviewing in detail against the full guide.

## **5 CMA Question 8**

We would welcome views on whether a longer duration for the Block Exemption would be desirable. Please outline the reasons for your answer highlighting any cost implications and associated risks of your preferred options (see Chapter 4 above).

In general, we support the proposed ten year extension rather than the previous five years, because this provides longer term legal certainty. We recognise the risks identified in paragraph 4.3<sup>4</sup> of the consultation and support the CMA's view that they are manageable.

The consultation document notes that the CMA is able to launch a review of the Block Exemption ahead of its expiry if considered necessary. This is a useful protection and we hope that the CMA would be open to representation from stakeholders in this regard. However, we consider it to be equally important to ensure the guidance notes keep pace with changes to technology and the business environment. To this end, we suggest the CMA considers setting up a mechanism where feedback from stakeholders as to the efficacy of the guidance notes in the context of such changes might be sought (say) every second year.

## **6 CMA Question 9**

Do you agree with the assessment outlined in Chapter 5 of this consultation? Please provide further explanation and information to support your answer. In addition we have highlighted some areas where we would welcome representations:

We broadly agree with the assessment outlined in Chapter 5 and in particular support the proposal to ensure the definition of 'ticket' in the Guidance Document fully encompasses the various categories of smart tickets (5.26). This should clarify that a physical ticket doesn't need to be issued for a transaction, it being sufficient to hold a product electronically, including those held on any physical media (such as smartcards, phones and contactless bank cards) and those evidenced by bar-codes but stored in the Cloud or in conventional data systems.

Regarding the CMA's arguments against allowing MTCs to be priced below the cap (5.32 - 5.35), we understand the logic and welcome the CMA's intention to address this point in the Guidance Document, given that many such capped products are currently under development as part of the DfT-supported Smart Cities initiative.

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<sup>4</sup> '[...] given the rate of change of technology, it is possible that new ticketing formats and products of an unanticipated type, and which are substantially different in their execution or impact on competition and operator incentives might emerge during the duration of the Block Exemption. [...] It is also possible that there could be significant changes in the policy or regulatory environment, or the competitive landscape around public transport'.

We also welcome the CMA's intention to add guidance regarding the independent administration of smart ticketing schemes and the sharing of information between operators (5.39 – 5.41).

9(a) We would welcome examples where MIT schemes have been abandoned or not commenced because of the requirements that revenue lies where it falls. We would also welcome proposals of other possible revenue share options that would satisfy section 9(1) conditions and under what conditions these would apply, for example where operators only overlap to a limited extent because their services mostly operate at different times of the day. (See paragraphs 5.17 to 5.20)

The requirement that revenue lies where it falls is an issue for the rail industry because the TOC collecting the revenue is generally determined by the DfT's decision as to the appointment of the Station Facility Operator for any particular station. In most cases, other TOCs providing carriage from that station have no opportunity to sell tickets, so it is impossible for revenue collection to balance out over time as envisaged in the guidance notes.

In the normal way of business, revenue from compulsory inter-available tickets is allocated amongst the TOCs who provide services for that flow according to a complex computer model known as ORCATS. In essence, it applies passenger choice modelling to the train timetable, to determine the relative attractiveness of different route alternatives. As such, TOCs are incentivised to compete on journey time, because this is the primary way in which they can increase their share of the revenue, the price being set by the (DfT-appointed) lead operator for that flow, acting alone.

However, the Ticketing and Settlement Agreement (TSA) also permits the creation of new through fares and inter-available fares by agreement between operators as to both price and revenue allocation. Whilst compliance with the TSA is a 'legal requirement', the fact that the TSA 'permits' rather than 'mandates' the creation of such products raises a doubt as to whether such agreements are excluded from the Chapter 1 prohibitions. The revenue allocation also prevents the Block Exemption being used, leaving TOCs reliant on a favourable interpretation of Article 9(1).

We would therefore like to see the Block Exemption extended to explicitly cover this situation. This could be readily achieved by including in the Block Exemption all schedule 7 template agreements under section 4-16 of the TSA. That way, appropriate multi-operator products become explicitly permissible.

9(b) Whether in relation to capped tickets there are any practical obstacles to redistributing revenue collected to the relevant operator on a revenue foregone basis for smart ticket sales which fall below the capped price. If so, what revenue allocation would be appropriate? (See paragraphs 5.36 to 5.38)

The predominant circumstance in which TOCs participate in capped smart tickets is Oyster PAYG, where this issue doesn't arise, because travel is treated as being individually ticketed, and settled as such, until the cumulative daily spend reaches the cap, at which point it becomes an MTC. As for the position outside London, we are unable to comment on the operational capability of the systems supporting the different smartcard schemes in which our members might be involved.

(c) Whether barriers are likely to arise for smart ticketing and the extent to which they could prevent participation in the schemes. (See paragraphs 5.42 to 5.44)

The main costs are to equip stations with gates or card validators. There are also some back office costs, but these are generally seen as reasonable. The magnitude of these costs has made it difficult historically to make a viable industry level business case, but where interavailable schemes do proceed, cost sharing mechanisms avoid barriers to the participation of particular TOCs.

## **7 CMA Question 10**

We consider that it is possible for new ticketing technology and products to be accommodated within the current Block Exemption (subject to clarification through revisions to the Guidance Document). Have there been any developments, in particular in ticketing technology and products, in the last five years or are any expected over the next five years that affect the Block Exemption and would require, in your view, a change in its terms? Please explain and provide specific examples.

We are not aware of any recent or expected developments in ticketing technology that would require a change to the terms of the Block Exemption. However, as already mentioned, it would be beneficial if the CMA were to seek stakeholder feedback on the efficacy of the guidelines on a regular, though infrequent, basis.

## **8 CMA Question 11**

Please provide any other information and/or views that you consider relevant for the CMA's review of the Block Exemption. Are there in your view other recommendations that the CMA should consider? For example, are there variations to the scope of the Block Exemption that have not been considered in this consultation document? Please provide any relevant evidence that you have to support your views.

We have no further comments to make.

## **9 Conclusions**

The Block Exemption enables a number of multi-operator schemes in which TOCs participate to exist and, in general, facilitates the creation of new products. All are of value to consumers and bring related benefits to non-users through reduced congestion and environmental improvements. The financial benefits to TOCs are modest and should the Block Exemption cease to exist, TOCs are likely to withdraw from such Schemes and the benefits to passengers and wider society would be lost.

ATOC supports the Competition and Markets Authority's conclusion that the Public Transport Ticketing Schemes Block Exemption should be extended for a further ten years. Furthermore, we see no need to make changes to its substance to cater for smart ticketing schemes, but would welcome improvements to the CMA's Guidance Document, which should be reviewed regularly.

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18<sup>th</sup> September 2015

**APPENDIX - Integrated Products Relying on Price Agreement between Operators (List is not exhaustive)**

**Note:** Data is from rail year 2014/15 (unless indicated otherwise) and relates only to journeys where the origin and destination fall within the Travelcard boundary.

Scheme	MIT	MTC	TT	Modes	Fares	Ticketing / Payment	Journeys (m)	Sales Revenue (£m)	Revenue retained by TOCs (£m)	Notes
<b>NATIONAL</b>										
<b>PLUSBUS</b>	No	No	No	Rail & Bus	Yes	No	1.0m PLUSBUS tkts issued	5.2 (bus value)	0.0	Requires Block Exemption. Can be a Short Distance or Long Distance Add-on.
<b>LONDON</b>										
<b>Travelcard Agreement.</b> Covers: Off-peak one-day, Season and Family Travelcards, Discount Travelcards, 16/17 year old Travelcards, GroupSave, Railcard discounts on Travelcards	No	Yes	No	Rail, Underground, Tram, Light Rail, DLR, Bus	Yes	Yes	317.8	800.4	590.9	A 'legal requirement' mandated through franchise agreements.
<b>Sundry Travelcard Agreement.</b> Covers Anytime day Travelcards.	No	Yes	No	Rail, Underground, Tram, Light Rail, Bus	Yes	Yes	6.4	37.3	24.2	Requires Block Exemption Only three product variants are available: zones 1-4; 1-6 and 1-9
<b>Through Ticketing (non-Travelcard) Agreement</b> Covers non-TC fares to/from LUL stations and cross-London segment of National Rail through tickets via London.	Yes	No	Yes	Rail, Underground, Tram, Light Rail, Bus	Yes	No	15.7	497.0	489.4	A 'legal requirement' mandated through franchise agreements.
<b>PAYG</b>	Yes	Yes	Yes	Rail, Underground, Tram, Light Rail, Bus, Riverboat, Cable Car	Yes	Yes	206.0	449.1	449.1	Either mandated through franchise agreements or a specific Direction from the DfT to each TOC to participate on the basis of public interest. Agreement is between TfL and TOCs for acceptance on TOC rail services. TOC Scheme in place for collective management including setting of rail only and joint fares

Scheme	MIT	MTC	TT	Modes	Fares	Ticketing / Payment	Journeys (m)	Sales Revenue (£m)	Revenue retained by TOCs (£m)	Notes
<b>CPAY</b>	Yes	Yes	Yes	Rail, Underground, Tram, Light Rail, Bus, Riverboat, Cable Car	No	Yes	57.0 ^	130.0 ^	130.0 ^	A 'legal requirement' mandated through franchise agreements (incl. as amended) or otherwise directed by the DfT. Agreement is supplemental to PAYG under which the fares are set (i.e. no fares setting takes place under the auspices of this agreement)
<b>Zonal Fares</b>	Yes	Yes	No	Rail only and joint with Underground and Rail (TfL)	Yes	No	47.5	565.9	150.3	A 'legal requirement' mandated through franchise agreements (incl. as amended). This scheme sets the fares for the paper ticket equivalents to the PAYG fares.
<b>REGIONAL</b>										
<b>Centro (West Midlands)</b>	No	Yes	No	Bus, Rail, Metro	Yes	Yes	20			Requires Block Exemption  Note: the journey figures (sourced from PTEG) are for rail journeys only and are estimated using 2011/12 and 2012/13 source data.
<b>Merseytravel (Merseyside)</b>	No	Yes	No	Bus, Rail, Ferry	Yes	Yes	11	Not known	Not known	
<b>GMPTE (Greater Manchester)</b>	Yes	Yes	No	Bus, Rail, Tram	Yes	Yes	15	Not known	Not known	
<b>Metro (West Yorkshire)</b>	No	Yes	No	Bus, Rail	Yes	Yes				
<b>Nexus (Tyne &amp; Wear)</b>	Yes	Yes	No	Bus, Rail, Metro, Ferry	Yes	Yes				
<b>South Yorkshire PTE</b>	#	Yes	No	Bus, Rail, Tram	Yes	Yes				
<b>Strathclyde Partnership for Travel</b>	No	Yes	No	Bus, Rail, Ferry, Subway	Yes	Yes	Not known	Not known	Not known	Requires Block Exemption
<b>Emerging Rail Smartcard Schemes</b>	No	Yes	No	Rail, Underground, Tram, Light Rail, DLR, Bus	Yes	Yes	2.7	13.6	12.5	Requires Block Exemption

# The TravelMaster Ltd website homepage mentions single journey tickets, but only multi-journey products are mentioned on the full list of products.

^ Estimated annualised figure for 2015/16 (CPAY only introduced in period 7 of 2014/15)

#### Some other Schemes in which TOCs participate:

RideCornwall (Multi-modal Bus/Rail scheme)	Dartmoor Sunday Rover (Devon CC managed multi-modal Bus/Rail scheme)
Freedom Travelpass (Multi-modal Bus/Rail covering former Avon County)	Cotswolds Discoverer (Multi-modal Bus/Rail covering Cotswolds AONB area)