

Journey Solutions partnership

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Renewal of Transport Ticketing Block Exemption

SUMMARY

The Journey Solutions partnership welcomes the opportunity to participate in this consultation and overall agrees with the need to renew the existing Transport Ticketing Block Exemption (herein referred to as simply 'BE'). We have found that the current BE fits our requirements perfectly well as it stands and we would strongly support its renewal. Any significant additions to the requirements to be met in order to come within the terms of the BE would be likely to cause our operation considerable expense and may jeopardise the future of the Plusbus ticketing scheme. Overall, we do however recognise that the BE does need updating in specific regard to how it should apply to the operation of schemes that do not include a "ticket" in a conventional sense.

Detailed Responses to Consultation questions

The BE is essential for the operation of our nationwide PlusBus ticketing scheme, which involves multi operator travelcards sold as short and long distance add-ons, as it provides clear guidance on how our product can operate within UK competition law, as it relates to passenger transport.

There is no doubt in our mind that without the BE PlusBus ticketing would really struggle to survive, as operators would not feel comfortable agreeing ticket prices or undertaking local revenue sharing without reference to the specific guidance in these areas that the BE gives.

If the BE was not renewed it is very likely that Plusbus (the UK's only nationwide train to bus ticketing scheme) would fail, as operators would not want to risk falling foul of the competition legislation that generally limits multi-operator ticket types.

We are not aware of any adverse consequences of the BE existing. Likewise we are not aware of the BE preventing any ticketing developments within our sphere of influence that would have benefited passengers.

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We have not encountered any difficulties applying the current BE rules to our existing business model.

We would agree that a longer duration on the validity of the BE would be most helpful, as it would provide greater certainty that our ticketing scheme shall remain lawful for a longer period. Having the BE valid for a longer period would also save us time and effort in taking part in the consultation process.

We welcome the inclusion of all currently known variations of smart tickets into the BE coverage and hope that this will be sufficient, firstly to permit development of PlusBus onto smartcards and, secondly to offer our product in “pay later” and “bank card as authority to travel” forms, neither of which involve a ticket (smart or otherwise) in the conventional sense, but do involve an event that creates a contractual right for a passenger to travel.

Yours sincerely,

Jonathan Radley
Commercial Director

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