

24 August 2015

Our Ref

RD/N14/5

Ticketing Block Exemption Team
Competition, Consumer and Markets Group
Competition and Markets Authority
7th Floor Victoria House
37 Southampton Row
London WC1B 4AD
Email: ticketingblockexemption@cma.gsi.gov.uk

Dear Sir

Consultation on Block Exemption for multi-operator ticketing schemes

Thank you for the opportunity to comment on the proposed extension to the block exemption from competition law for multi-operator ticketing in relation to public transport.

Nestrans is the statutory Regional Transport Partnership covering the areas of Aberdeen City and Aberdeenshire Councils. Although public transport responsibilities lie primarily with the local authorities, Nestrans is a partner in the North East Scotland Quality Bus Partnership and works closely with both Councils and bus operators towards improving public transport across the area.

A report was considered by the Nestrans Board at its meeting on 21 August 2015 and this response was approved as the Partnership's response to the consultation:

1. Nestrans welcomes and supports the proposed extension of the block exemption, on the basis that it provides an opportunity to improve ticketing options for the benefit of passengers;
2. We consider the block exemption to be necessary to deliver integrated ticketing schemes that are beneficial to consumers;
3. Consumer choice could be reduced without the exemption;
4. A recently introduced integrated ticketing scheme in the North East of Scotland is the Grasshopper scheme – it provides for through ticketing, is a multi-operator scheme and is proving to be popular and beneficial to consumers.

As a strategic transport body, we feel that it is appropriate only to respond to the general principles. Technical consideration and responses to the detailed questions in the consultation are better dealt with by local authorities and bus operators and are therefore not responded to. Thank you for the opportunity to comment on the proposals and I hope that these comments are helpful. If you would like to discuss any of the points raised in more detail, please do not hesitate to contact me.

Yours sincerely

Rab Dickson, Transport Strategy Manager