

To Whom It May Concern

I refer to the Public Transport Ticketing Schemes Block Exemption Review and would respond as follows:

We are in favour of retaining the Public Transport Ticketing Schemes Block Exemption, believing it to be important in allowing the bus industry to provide ticket products which customers (and local authorities) say they want. The alternative of self-assessment against the Competition Act 1998 lacks certainty and exposure to enforcement action.

We agree that a 10 year period before the next scheduled review is helpful in providing clarity for a decent period of time while also reducing the burden on operators and government. I accept that significant developments in ticketing technology might require the guidance to be updated periodically during that time.

We agree that the Guidance Document needs to be updated and made as clear as possible as we wish to be as certain as possible that any ticketing initiative we enter into with other parties will not expose us to possible enforcement action and do not wish to rely on the existing CMA Short-Form Opinion Process.

We currently are not party to any multi-operator ticketing agreement save the acceptance of the return portion of Arriva tickets and Arriva period tickets on defined sections of parallel routes (and vice versa) which is hugely appreciated by our customers and theirs. Revenue lies where it falls. However, we aspire to entering joint arrangements with other bus companies and transport modes (eg rail companies) and need the Public Transport Ticketing Schemes Block Exemption to facilitate this as simply and easily as possible. Its all about meeting the needs of our existing and future customers.

Incidentally, we were once part of the PlusBus scheme but exited from this as the mileage based reimbursement formula was grossly unfair to us who carried a far greater number of PlusBus holders than the scheduled mileage split would indicate. However, other operators refused to change to a passenger journey basis (such an arrangement wouldn't benefit them as much and they considered the costs of operation/audit of such a reimbursement formula to outweigh the benefits of the Scheme) leaving us, as one of the smallest players, with little option but to exit from the Scheme).

I trust that the above comments are helpful and I look forward to a good outcome for passengers as a result of your current consultation.

Best regards

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Managing Director

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