

Ticketing Block Exemption Team
Competition, Consumer and Markets Group
Competition and Markets Authority
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14 September 2015

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Dear Sir/Madam,

Public transport ticketing schemes block exemption review

I am responding on behalf of Transport Focus to the above consultation.

Transport Focus agrees that the Block Extension should be renewed. Our research shows that bus passengers in particular value the type of multi-operator tickets supported by the block exemption:

- Our survey of bus passengers' priorities for improvement in 2010 showed that in England (outside of London) passengers rated the provision of multi-operator ticketing as their fourth highest priority for improving services. This is a higher priority among passengers in metropolitan and urban areas. It is also a much higher priority for fare-paying passengers (4th out of 30) than those travelling on free passes (18th out of 30) who are essentially already enjoying the benefits of being able to get on the first bus that comes.

We are currently updating bus passenger priorities and hope to have a renewed 'list' later this year.

- Our report, *Bus passenger views on value for money (2013)*, also found that bus passengers valued multi-operator tickets. This was particularly so for younger passengers who value the flexibility they offer. Passengers can become frustrated when they cannot use other tickets on multiple bus operators and feel they are receiving poor value for money when this is the case. Passengers suggested increasing value for money by introducing a ticket (smartcard) that can be used on all operators.

We believe that there is genuine risk that such products would not be offered without the presence of, and the reassurance offered by, the block exemption. Its removal would have a detrimental impact on consumer choice. We are also not aware of any adverse consequences arising from the exemption.

We note the proposal to extend the extension from 5 years to 10 years. We support this move as it will help increase stability/expectations while at the same time reducing costs associated with subsequent reviews. In saying this we note, and support, the ability of the CMA to trigger a review should there be any significant changes to the ticketing world, the competitive landscape or the regulatory/legislative environment.

Yours faithfully

Mike Hewitson

Transport Focus