



Response from Bus Users UK to the open consultation on the Public Transport Ticketing Scheme Block Exemption

May 2021

Q1: What are the benefits of integrated ticketing schemes? To what extent do consumers enjoy a fair share of these benefits?

Integrated ticketing is an essential part of attracting people onto public transport. It is key to overcoming the perceived barrier of inconvenience, particularly in multi-modal journeys. It is also important for people on lower incomes who want to be able to budget carefully in advance for their journeys and need to have clarity and certainty.

A lower-carbon future depends on moving people out of private cars onto a sustainable form of transport, and that means making those options accessible, affordable and easy for all. This requires public engagement to ensure the available options meet people's needs, and can be easily accessed without needing expensive technology or contactless bank cards. If a future transport scheme is to be inclusive, it needs to ensure current users are not forgotten in the rush for new customers. Block ticketing exemptions need to ensure acceptance of physical tickets and not just digital passes.

Q3: Has the Block Exemption given operators confidence to invest in appropriate systems and technology to deliver multi-operator, including multi-modal, products?

Many operators have invested heavily in the relevant technology but even with Block Exemptions, Transport for the North has struggled to get multi-modal ticketing off the ground. We are aware that some smaller operators fear the financial exposure of having to invest large sums to take part in local initiatives or to be equal partners in various schemes. In the West Midlands Enhanced Partnership Scheme, we made sure that all parties would only be charged in proportion to their income for access to EP-wide technological packages so that their investment would be equitable, rather than equal.

Excluding small operators from such schemes would be detrimental to the passenger as it would erode confidence in the ability to travel via the most appropriate carrier. Certainly it would be useful to ensure that operators are not excluded from any multi-modal scheme simply because they cannot afford the technology or systems upgrades.

Q6: Do you consider that the Block Exemption will encourage the use of integrated ticketing schemes which involve new modes of transport, such as Mobility-as-a-Service ticket types, or public bicycle or e-scooter hire schemes?

We feel that options to include all modes of transport will make it far easier for passengers to tailor their transport purchases to their particular, often changing needs. Likewise, any ticket bought for a journey which can't be made for a technical reason, should be transferable to any reasonable alternative means of continuing the journey, eg if a train breaks down and a replacement bus is some time away, passengers should be able to use the tickets to complete their journey by e-bike, a car-share scheme or scheduled bus if necessary.

Q7: Are you aware of, do you foresee or have you encountered any difficulties in applying the Block Exemption criteria in relation to new modes of transport?

Besides the financial impediments, technological incompatibility issues and the longstanding fear within the industry of running foul of the CMA if any part of a scheme is not considered to be covered, it would seem that the technology is available to meet the needs of any form of transport. The challenge will be ensuring that would-be passengers who are digitally or financially excluded from using the apps or payment mechanisms are not prevented from travelling in a new transport world.

However, if sufficient consultation and cohesive marketing is carried out among the communities to be served at an early enough stage, solutions should be able to be put in place to allow access for all.

It would be useful if the Regulators of all transport modes were required to have the consumer interest at the heart of their role in order to investigate disputes of this nature in future. This is currently not the case with the Traffic Commissioner, unlike any other Industry Regulator.

Q8: Have developments in transport services, including the development of new transport services such as Mobility-as-a-Service, impacted on the effectiveness of the Block Exemption at encouraging integrated ticketing schemes?

Only in the sense of many LTAs and some operators not understanding the benefits of such schemes and fears of losing the current ridership, both of which are understandable given the speed of development of new ideas and options. It underlines the need for all developments to be nimble, flexible and able to upgrade to include new options without going back to the drawing board.

There is no doubt in our minds that a Block Exemption scheme is essential to realise the flexible mobility options which should become available to all communities, urban, rural or anywhere in-between.

Q10: Has the Block Exemption led to a reduction in competition between transport operators in any aspect other than the pricing of multi-operator tickets and the sharing of revenue from those tickets (e.g., quality, reliability, flexibility)?

As the registered Alternative Dispute Resolution body for bus and coach, we have seen no evidence of issues in this regard coming to us in the form of complaints or social media posts, In fact, anecdotally, we would say that Block Exemption has seen operators compete in other ways, leading to improvements in bus design and quality.

About Bus Users

Bus Users campaigns for inclusive, accessible transport. We are the only approved Alternative Dispute Resolution Body for the bus and coach industry and the designated body for handling complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of a Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel.

Alongside our complaints work we investigate and monitor services and work with operators and transport providers to improve services for everyone. We run events, carry out research, respond to consultations, speak at government select committees and take part in industry events to make sure the voice of the passenger is heard.

Bus Users UK Charitable Trust Ltd is a registered charity (1178677 and SC049144) and a Company Limited by Guarantee (04635458).

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