

The absence of comment on any specific point in the consultation should not be inferred to imply support for the existing content, however I wish to specifically draw attention to the following parts of the consultation:

### 3. Franchises

The existence of a monopoly results in complacency with regard to customer service and pricing. In awarding any form of "exclusivity" even if only on a single route, the Scottish Government must address how it will limit the adverse effects of such a monopoly.

Evidence from the rest of the UK seems to suggest that when rail operation becomes fragmented, the public understanding and access to fair pricing becomes reduced. If the Scottish Government elects to fragment any part of the existing structure it must address how passengers will gain best access to open, fair value pricing.

#### 6.15 - Self regulation of Intercity fares

The claim that intercity fares self regulate due to the option to "modal shift" to the car ignores the fact that road capacity in many areas is already at capacity and modal shift may be limited by practical or comfort effects other than simply cost.

In many of the suburban routes viable alternative public transport exists so these routes should also "self regulate" with a shift toward bus travel if prices increase too much. In contrast many of longer distance / intercity routes are not well served by practical alternative forms of public transport, especially the intermediate stops. Accordingly I would suggest price regulation SHOULD be considered for these routes (e.g. there is no other practical public transport between Linlithgow/Polmont and Glasgow; or between Bridge of Allan/Dunblane and Edinburgh). A price cap "per mile" may be appropriate? A simple basis may be that it should always be cheaper to take a train from A-B than drive a car with modern fuel economy (say 40 mile/gal) with a single passenger.

#### 6.20 - Tax payer subsidy

The level of subsidy seems high, given the high levels of fare. The franchisee must look for ways to reduce cost. This may mean reducing staffing levels at stations, and on board trains. It must surely be the Scottish Government objective to reduce its contribution to the income of the franchisee to less than 50% of the total within the first half of the new franchise.

#### 6.27 - Off peak services / peak demand

The current fare structure does not encourage effective use of capacity. E.g. the peak period is defined simply as before 9.15 am, yet very early services are quiet. There is no incentive to "leave early to miss the rush". Evening peak services are however focussed on the genuinely peak period. However tickets are either "peak" or "off

peak". There is no discount if I make one half of a return journey at an off peak time. E.g. a worker travelling on the 07:15 and 16:15, 08:15 and 17:15, and 09:15 and 18:15 services all have equal pricing even though the central option is at the worst time for capacity.

Could some form of "loyalty scheme" reward passengers for travelling at off-peak times? Perhaps this could be related to smart ticketing. Rather than create pricing confusion, this could offer a discount/rebate for passengers who make most use of "quiet" services.

#### 7.34 - Car parks

Whilst accepting that this is outwith the scope of the consultation - consideration should be given to funding station car parks through charging. This would benefit those travellers who use environmentally sustainable alternatives to the car (bike, walk, bus) for connecting journeys, and provide additional revenue from those who do not. It would need to be clear who would receive such income (e.g. Franchisee, Network rail etc).

#### 7.35/9.19 - Cycle provision

Whilst you have mentioned cycle storage you have not covered transportation of bikes on trains. This is a major issue. During peak times it can be difficult to get bikes on busy trains. The main Glasgow-Edinburgh route only accepts 2 bikes. These factors make it difficult for people to use a bike for onward journeys beyond their final rail destination. It must be a franchise requirement to maintain free cycle transport. Bike carriage must be encouraged and where trains are to be refurbished or replaced consideration given to increasing capacity.

#### 9.20 - Diesel trains on long distance services.

Any journey lasting over 1 hour should be on a service with a toilet.  
Any journey lasting over 2 hours should be on a service with a trolley / buffer service.  
Any journey lasting over 3 hours should ideally be on the sort of rolling stock normally found on "UK Intercity" services - e.g. Virgin / Eastcoast). Where passenger comfort is greater.  
Plug in points outside first class for mobile phones/laptops should be included on longer services.

#### 10.4 - Ancillary services: charging.

It seems clear that you expect the rail operator to provide enhanced services at a premium to customers. Bearing in mind that rail travel is already an "expensive" option this seems to be defeating the purpose of encouraging users onto the rail network. With "inter-city" bus services already offering such services "free of charge" it seems that the price expectations of the market will be clear.

If capacity and cost really are barriers then perhaps 1st Class services could offer this as part of the enhanced package - encouraging greater use of these often quiet sections of the trains. Notwithstanding the points made at 10.14 below.

IF you insist that this must be provided on the basis that the user pays, then there seems to be no reason that this service must be provided by the rail operator. Why can this service not be opened to competitive tender with the rail company forced to cooperate in the service installation? The existing operator has had ample opportunity to introduce either paid or free services but ignored the opportunity.

#### 10.6 - Provision of data connections

The implication that technology moves too fast to keep up is incredibly naive. Data connectivity on the existing Scotrail network is a national embarrassment. A failure to innovate because of the inevitability that at some point the installation will be obsolete is somewhat conservative - with attitudes like that rail would never have been adopted in the first place. As noted at 10.8 the technology has been in general use for at least 7 years elsewhere.

#### 10.7 - Mobile network coverage

Presumably the person who wrote that paragraph has never tried to hold a conversation lasting more than a few minutes on the main Glasgow-Edinburgh line. Whilst there may be extensive coverage, unless it is continuous it is next to useless. Likewise coverage is needed for multiple operators as it is obviously not possible to switch carrier mid journey. Loss of signal in tunnels and cuttings can be technologically addressed. Perhaps there is an opportunity to work with the carriers to provide improved coverage by facilitating the citing of masts on network rail land?

#### 10.14 - First class at peak periods

There is nothing more infuriating as a "second class" passenger at peak periods than finding yourself standing squeezed onto a train whilst seats sit empty in first class. However it would be equally as frustrating if having paid extra for first class either the facilities were not available at peak times, or 2nd Class passengers were allowed to overspill into them. Whilst there remains demand for 1st class facilities it seems pointless to remove the option when it generates significant revenue, and the focus must be on maximising availability of seats in 2nd Class. However it should be noted that the first class value proposition depends on factors such as complimentary coffee, newspapers etc. If those facilities are diminished the added value may no longer make sense.

#### 10.18 - Safety/Security and alcohol

It seems contradictory to note that the travelling public have good views about safety on board above the national average, and the suggest a tougher regime in Scotland for controlling alcohol on board. That is not to ignore the country's unhealthy relationship with alcohol.

I recognise the "problem" with drink on board, but in my experience the vast majority of "drunken behaviour" on trains, involves people who board the train intoxicated, not those who get that way once on board.

Your possible solution would appear not to address that problem. One of the comforts of traveling long distances by train is the option to enjoy a beer or glass of wine if you so choose. Removing that option seems an unnecessary constraint on the travelling public, the vast majority of whom manage to do so without causing problems. Obviously there is a "cross border" complication to consider too - where drinking on services would be acceptable in England but not Scotland. It is probably very difficult to spot/stop the premixed "vodka and coke" customer in any case.

Can I suggest there may be other options to consider? e.g. banning the consumption of alcohol on board except when purchased from the on-train buffet/trolley facility. This would put some onus for responsible sales on the retailer. This combined with the high cost of such facilities would go a long way to stopping customers from getting progressively more drunk once on board. Time restrictions (e.g. an 11pm close?) would also help prevent problems on the services most likely to be of concern.

#### 10.24 - Staffing levels

Whilst there may be good reasons for having 2 staff on board, there should be questions asked about the efficiency of having, electronic ticket barriers to access the platform; electronic ticket barriers to exit the platform (both of which require staff to man them to deal with problems etc) as well as checking tickets when on board. Many intermediate stations also have staffed ticket inspections at peak times. It really isn't necessary to check my ticket 3 times on a 15 minute early morning journey from Linlithgow to Edinburgh. Paying 3 members of staff seems excessive and should offer scope for fare reductions via better efficiency.

#### 10.30 - Information

The availability of information is, as noted, critical especially when things go wrong. Access to wifi would help (both at stations and on trains). More details of reasons for delays would at least be nice to have if not actually helpful. Joined up travel information should be a prerequisite to the franchise. Bringing the existing "maintain a website" requirement up-to-date there should be an expectation that the franchisee will provide a free-of-charge "App" for smartphones (iphone/android/blackberry) with up-to-date departure information.

#### 11. - Sleeper

The Sleeper services offer a good alternative to air transport, but are relatively expensive. Headline prices are often not available. Better facilities may be attractive (including wifi) but are unlikely to attract premium payments. The introduction of a sleeper bus service should show that at the right price there is demand for low cost, long distance, overnight travel. Options to travel to other cities, e.g. Birmingham are not available which may limit the uptake. Past experience of sleeper services suggest they are not particularly comfortable and this needs to be addressed to preserve the long term

viability of the service.