

Consultation on changes to bus registration in Scotland



RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Comhairle nan Eilean Siar (Western Isles Council)

Title **Mr X** **Ms** **Mrs** **Miss** **Dr** *Please tick as appropriate*

Surname

Smart

Forename

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2. Postal Address

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3. Permissions - I am responding as...

Individual / Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Transport Scotland web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick **ONE** of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Transport Scotland web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Transport Scotland to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: do you agree with the proposal to extend the pre-registration notice period from 14 days to 28 days ?

Yes No

This proposal to increase the pre-registration period will be useful for LTAs that have commercial services operating within their boundary. This may allow additional time to assess the impact of commercial operator's decisions to alter or cancel bus services and thus allowing options for LTA to take action if required.

This proposal has little relevance to registered local bus services operated within the Western Isles as all the public bus services are under contract with the Comhairle whose transport staff centrally control bus service registrations. It is highly unlikely that a commercially operated local bus service would be viable within the Western Isles.

Question 2: Do you agree with the proposal to replace the duty to inform the relevant authorities before making an application for registration with a duty to consult with the relevant authorities?

Yes No

We would agree with this proposal to consult as it may encourage a collaborative approach between commercial operators and transport authorities. Additional guidance on the level of information exchanged during the consultation phase would be needed to get a satisfactory understanding of any impact to the travelling public brought about through registration changes.

Question 3: Do you agree that relevant authorities should be encouraged through guidance to draw potential concerns about new registrations to the attention of the traffic Commissioner for Scotland and/or Transport Scotland?

Yes No

We agree with this proposal in principal but again there would need to be guidance of registration proposals that fall into a category that may cause concern to either the quality of the service offered to the passengers or unfair competitive timetables that are aimed at reducing the revenue income of a commercial or subsidised competitor. We are unsure of the Traffic Commissioners remit and powers to decline a such a registration.

Question 4a: Do you agree with the proposal to reduce the period of registration from 56 days to 42 days? What difficulties (if any) do you consider such a change might present and how might these be addressed?

Yes No

As the Comhairle control all bus service registrations a reduction in the formal notification period would be welcomed allowing important service changes to be implemented 14 days earlier.

Question 4b: An alternative option would be to reduce the registration period from 56 days to 42 days only where Electronic Bus Service Registration (EBSR) is used. Do you agree with this?

Yes No

We would prefer that the proposed reduction to the registration period be applied to both paper form and EBSR applications.

Question 5: Do you agree that we should require operators to detail within registered hourly frequency bands any services that are registered as frequent services?

Yes No

In the context of commercial bus operations this proposal would benefit the travelling public by providing better travel information. This may also be useful to routes with RTI systems. All registrations co-ordinated by the Comhairle include the entire service timetable.

Question 6: Do you agree that if the proposed changes set out above are adopted, they will improve the bus registration process in Scotland ?

Yes No

These proposals are in our opinion an improvement to the process and may encourage closer working between commercial bus operators and LTAs.

Question 7: It is possible that much of what is proposed above could be achieved through Guidance and/or a Code of Conduct to facilitate engagement between operators and relevant authorities rather than changes to the legislation. Do you have any views on this?

Yes No

These proposals would need an element of enforcement and regulation would be more effective than a code of conduct which may be open to operator's interpretation of the rules.