

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

Tayside Public Transport Co Ltd: T/a National Express Dundee

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

Surname

Philip

Forename

Smith

2. Postal Address

44-48 East Dock Street

Dundee

DD13JS

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

Yes: So long as the overall period for registration does not exceed the current maximum of 70 days. i.e. 28 days for LA's and then 42 days with the Scottish Traffic Commissioner

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

This Company does not agree with the proposition that the requirement to "inform" local authorities be changed to "consult". The period in which LA's are entitled to be informed of impending changes should not evolve into an opportunity for them to delay or veto operators plans to vary commercial bus services.

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

Any concerns/suggested modifications/ objections to intended service changes should be addressed to the operator involved in those changes and NOT the Traffic Commissioner

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

This Company would NOT object to the reduction proposed, so long as the overall period for the process: i.e. 28 days for informing local authority partners is not further increased.

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

EBSR would not be acceptable to this business because the inaugural costs of installation prevents a business case for a fleet of this size in Scotland, therefore this Company would be against this proposal.

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

This is not a measure that this Company could support.

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

The proposition stated in Q6 would not improve the current situation and this proposal would potentially hamper operators from efficiently serving the best interests of bus passengers.

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

Any changes would be best served by the use of a Code of Conduct, this would preserve the flexibility that a customer serving industry needs to respond to the needs of its users.