

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

Anonymous

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

Surname

Forename

2. Postal Address

<input type="text"/>		
<input type="text"/>		
<input type="text"/>		
<input type="text"/>		
Postcode	Phone	Email

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

Anything that delays the implementation of a new or an improved service is not in the interest of the travelling public. It may be pertinent to extend the period where a service is being reduced below that existing, say below twice hourly during the day, or hourly in the evenings. This should include total withdrawals.

You need a twin track approach, to treat any service reduction differently to a service improvement.

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

No, where a service is being improved or adjusted without a service reduction.

Yes where a service is being reduced below twice hourly during the day, or hourly in the evenings, or withdrawn at any point during the day.

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

And you would hope that they can do it within 14 days, or they should lose the right to be heard.

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 should apply only where a service is being reduced or cancelled. Why on earth should there be a 42 day registration period for a service that is being improved or simply

adjusted.

Note that having to wait 42 days to change a bus service that meets trains or ferries could present problems, unless you can ensure those other services can provide notice of more than two months for any changes to their services.

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

No, the post hasn't got that bad yet.

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

If only life were that simple, then services on a ten minute interval service might turn up every ten minutes. Perhaps making six services per hour a maximum on a route (excepting rush hours) would solve that problem. Traffic Commissioners to rule on any complaints of cheating from competitors!

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

Only if you leave the bus companies to get on with improving services without too much interference, and take action as necessary when service reductions are proposed

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

A code of conduct would be preferable, being less prescriptive. Again the T.C's could rule on any disputes as a last resort. Legislation tends to tie things in knots.