

## Comments for the ORR Retail market review closing 31/10/14

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Comments against 'Retail market review'. ('retail-market-review-consultation-september-2014.pdf')

### Summary Para 3

**'[passengers] also have greater choice in the format of their ticket, with greater use of smart ticketing (at least in metropolitan areas) and mobile ticketing.'**

That sentence should have been much more forward looking, asking about making use of new ticket media, and ticketless travel.

The position with new rail franchise agreements (some already awarded) is that the operators are mandated to implement what the author of this submission calls 'full fat ITSO', and some have already implemented limited function smart ticketing. In future that method is going to apply to widespread volume implementation of ITSO methods in Smartphones. One ITSO Member (Ecebs Ltd) has already announced the implementation of ITSO method ticketing in Smartphones, and it is known that another organisation, currently un-named, is working with ITSO Ltd on implementing the same type of methodology. However, both Smartphone developments are still to pass scrutiny by or for ITSO Ltd of the security methodology implemented.

That comment leads on to a more general comment. DfT policy, as set out in the document 'Door to Door – A strategy for improving sustainable transport integration' dated March 2013 ([1] [2] and other material) includes multi-modal through travel by public transport, with integrated ticketing. Currently there is only PlusBus at national level, and possibly some local provision, but there is clearly the intention to develop this methodology further. We may soon manage to implement the 1998 Prescott White Paper's intentions... [3][4] The consultation should have incorporated the Door to Door policy.

[1] [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/142539/door-to-door-strategy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/142539/door-to-door-strategy.pdf)

[2] <https://www.gov.uk/government/publications/door-to-door-strategy>

[3] <http://news.bbc.co.uk/1/hi/magazine/8465383.stm>

[4]

<http://wearchive.nationalarchives.gov.uk/+http://www.dft.gov.uk/about/strategy/whitepapers/previous/aneudealfortransportbetterfo5695>

The author of these notes is, and has been from the start, a Member of ITSO Ltd. He was a Director of the Company in its early years.

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