# Action for Public Transport (NSW)

P.O. Box K 606, Haymarket NSW 1240 www.aptnsw.org.au

28th May 2003

Dr Thomas Parry Chairman Independent Pricing and Regulatory Tribunal of NSW Level 2, 44 Market Street Sydney NSW 2000

(P.O. Box Q290, QVB Post Office NSW 1230)

Dear Dr Parry,

Determination of Passenger Transport Fares from September 2003

Government Trains, Buses and Ferries

Second Submission

#### INTRODUCTION

This is the second of two submissions from Action for Public Transport on fares for government transport services. The first was sent before the closing date for submissions from the authorities in the hope that the authorities would address in their submissions some of the matters we raised. This second submission comments mainly on the proposals, or lack thereof, in CityRail's and State Transit's submissions.

The headings of the 60 items in our first submission are listed in Appendix A for reference, and the numbering in this submission continues from there.

#### SUMMARY

### 61. Summary of APT's Submission

- We censure the CityRail and State Transit submissions for their lack of content and for their deferral of everything to somebody else and some other time.
- We reject the proposition that the discounts on the periodicals (especially the TravelPasses) are too generous and must be drastically reduced
- We criticise State Transit for its unwillingness to tackle the problem of the high proportion of bus passengers paying single cash fares
- We are disappointed that the authorities never discussed with us any of the proposals made in our first submission over three months ago
- We propose a few more minor initiatives not mentioned in our first submission.

# COMMENTS ON CITYRAIL AND STA PROPOSALS (OR LACK THEREOF)

# 62. General Comments

The submissions by CityRail and State Transit are remarkable, more for what they don't say than for what they do. They contain many platitudes but few plans, many shadows but little substance, much history but little hope, and many arguments but little conviction. The documents are characterised by timidity or inertia, paralysis or fear, and procrastination or misplaced optimism. The excuses for doing nothing are stated variously as – the Tribunal will decide the fares, the Integrated Ticketing system is coming "soon", wait and see what the coming Funding Enquiry says – and probably unstated reasons such as - tread warily until Mr Costa has put his broom away.

Apart from saying what a good job they are doing (and we don't dispute that), there is not one firm, detailed proposal in the whole of State Transit's submission for Sydney Buses. The small table of proposed capital expenditure for the next four years on page 6 reveals very little. The Sydney Ferries submission is similar, although in one instance they have thrown caution to the winds and proposed a new "Upper Parramatta River" ticket. (The name could probably do with a make-over.) The submission for Newcastle buses and ferries is also "steady as she goes". All three submissions talk about a "holding pattern", a "modest rise to match CPI" and an increment "to respond to the increasing cost base".

The CityRail proposal is similar to State Transit's. No forecasts and no specific proposals for fares or tickets. A few innovations such as off-peak singles and Rail TravelTens are promised - but not just yet.

The one area in which both authorities seem to show some united spirit is in their wish to milk the captive, got-a-job, must-be-rich, adult periodical ticket holders. CityRail proposes to reduce discounts (RailSpeak for increase prices) on periodicals "in the metropolitan area" (page 26). State Transit proposes the same for TravelPasses, TravelTens and FerryTens, which tickets are also confined to the metropolitan area. Users of these tickets have been the front-line cannon fodder for fare increases over the past seven or eight years. In paragraphs 35-43 of our first submission, we recommended little or no increases in periodical tickets, small increases in single train and ferry fares, but large increases in single bus fares.

This proposal for increased single bus fares was one of several measures designed to reduce the proportion of cash fares paid to the driver, as well as relieving the constant burden of fare increases on multi-ride ticket holders

We are very disappointed that, after the authorities acknowledged receipt of our first proposals in January, we never heard from them again. Even in their own submissions they have failed to mention most of our proposals, neither supporting nor rejecting them, so we will now have to raise them with the Tribunal. If the authorities had explained, either in discussion or in their submissions, why such-and-such could or could not be done, we would have been happy to let the matter rest (at least, until next year).

This submission also raises some minor new matters, such as Business Railcards, Periodicals by Salary Deduction, and Rebates on lost periodicals.

# 63. Reducing Discount on Rail Periodicals

This proposal is mentioned several times in CityRail's submission, but only once are the words "in the metropolitan area" added. This raises two questions:

(a) The discounts on periodicals from beyond the suburban area to Central are much greater than those from within the suburban area to Central. See the following table:

Central to	Single	Weekly	Multiplier *	Discount **
City Circle, Redfern, Newtown	2.20	17.00	7.7	23%
Petersham, Ashfield	2.60	20.00	7.7	23%
Burwood, Flemington	2.80	23.00	8.2	18%
Lidcombe, Granville, Parramatta	3.40	26.00	7.6	24%
Westmead	4.20	31.00	7.4	26%
Seven Hills, Blacktown	5.20	36.00	6.9	31%
St Mary's, Kingswood	6.00	39.00	6.5	35%
Penrith, Emu Plains	6.60	43.00	6.5	35%
Glenbrook	8.00	46.00	5.7	43%
Springwood	8.80	49.00	5.6	44%
Woodford	9.80	51.00	5.2	48%
Lawson, Wentworth Falls	10.20	53.00	5.2	48%
Katoomba	11.40	55.00	4.8	52%
Mt Victoria	13.00	63.00	4.8	54%
Lithgow	17.00	73.00	4.3	57%

<sup>\*</sup> Number of single trips to equal the cost of a weekly

If CityRail wishes to reduce the discount, why does it not also tackle the even more generous discounts on the longer distance trips?

(b) There would also be inequity if CityRail reduced the discount for short distance periodicals within the metropolitan area (Burwood to Central, Burwood to Granville) but did not reduce the discounts for equivalent short distances outside the metropolitan area (Lawson to Katoomba). These weeklies all cost \$23.00.

CityRail needs to spell out more precisely the ramifications of "in the metropolitan area".

Many people don't work five days a week and make ten trips. A person who worked four days a week would obtain no savings at all if the discount were reduced to 20% or less.

#### 64. "Burden on Taxpayers"

We have criticised CityRail before about using these emotive words. In one paragraph on page 6 they mention both the burden on taxpayers and the contribution from taxpayers. However, in the section on External Benefits, they mention the various beneficiaries of the rail system, and close by talking about "an investment by the community in CityRail". Everybody is a taxpayer, and everybody benefits.

<sup>\*\*</sup> The percentage that a weekly is discounted from 10 single trips

## 65. Factors Other Than Price

We agree that for many, or perhaps most people, price is not the most important factor in deciding whether or not to choose public transport. Both CityRail and State Transit have mentioned this in their submissions. The other factors in the decision are well known and need not be repeated here. However, given the current level of complaints about public transport (justified or not), it would seem unwise or insensitive to impose large fare increases now. The public is saying that they will pay for better services when they get better services.

# 66. Where Will the Money Come From?

Rejecting large fare increases now means that money for improvements cannot be expected from fares. If the customers want to see better trains, buses and ferries before they pay their money, then alternative sources of finance must be found to pay for the improvements. This will be considered by the Funding Enquiry that will commence soon. The money to improve the services could be in the form of a loan, to be repaid from higher fares when the improvements are implemented. It is to be hoped that the authorities have plans ready should large sums of money suddenly come their way.

### 67. Where Will the Money Go To?

Do the authorities possess costed project plans that would deliver specific benefits in specific areas in a specific time, if only they had the money? In other words, are they in a position, tomorrow, to ask the Government for a precise sum of money to spend on particular projects that will deliver measurable benefits in a defined time? This is in addition to the capital requirements already in their budgets, small because of the authorities' limited horizons and expectations.

### 68. Rail TravelTens

CityRail says these cannot be introduced until the Integrated Ticketing system arrives. APT says that the tickets could be implemented in a limited way in a few months if CityRail put their mind to it. After all, the idea has been tossed around for several years now. Somebody must have had some ideas.

We agree that RailTens could not begin system-wide until every station has some sort of recording or validating device at the gate. However, the place where the ticket is sorely needed is just the place where every station does have barrier machines – the Central Business District. In the area bounded by North Sydney, Kings Cross and Redfern, every station has automatic barriers. Within this area, many people do not have periodical rail tickets, but need to travel around the city or across the bridge either for work or shopping or after-work entertainment.

The single fare from any one of the CBD stations to any other is either \$2.20 or \$2.60. To be workable, the City RailTen would have to be based on a common fare, and also offer a reasonable discount. If we said the common fare was \$2.40, and gave a 20% discount, then ten tickets would cost \$19.20 – say \$20.00 rounded. This would still provide a 9 % discount off a \$2.20 ticket, and also save the user time through not having to queue up to buy a ticket.

The CityRail barrier machines do not print anything on tickets as they are validated, unlike the Green Machines on buses that record each trip on TravelTens. CityRail would have to decide if this is a problem, and if so, find a way around it.

CityRail says (para 2.9.3) that they cannot even provide a RailTen for the CBD "due to the prohibitive cost and operational changes required". We find this difficult to believe. The AirportLink company introduced "ten-for-nine" tickets in April 2003.

We strongly caution – repeat, strongly caution CityRail and State Transit not to wait until after the Integrated Ticketing system is installed before implementing ticket reforms. We have grave doubts as to whether anything like what is expected from that system will ever happen.

# 69. Car Parks

CityRail says (page 21) that they have "provided a new 39-space car park at Broadmeadow costing \$545,000". That works out at \$14,000 per car. APT wonders whether that money could have been better spent on improving the bus services and interchange facilities at this or some other station which could benefit hundreds of people instead of just thirty-nine.

# 70. A Limit to the Funding?

State Transit says in its submission on Sydney Buses (page 4) "Government faces increasing demands for funds both within and outside the transport portfolio. Accordingly there is a limit to the funding that can be allocated to State Transit." We say that, depending on how seriously the government sees the problem, there need be no limit to the funding that can be allocated. The government appears to have no hesitation in continuing to allocate billions of dollars to roads, which not only starves State Transit (and CityRail) of funds, but makes worse the problems that public transport is expected to solve.

### 71. TravelPass Discounts

State Transit, on page 9 of the Sydney Buses submission, says that TravelPass discounts range from 34% to 47%. We have no way of verifying these figures, and we doubt that State Transit has either, but we consider the assertion to be excessive. The discounts would vary from person to person.

Looking at both ends of the scale, the Purple TravelPass costs \$52 and the Blue TravelPass costs \$27.

An average Purple TravelPass user might make ten rail trips between St Marys and the City and ten 1-2 section bus trips. They would probably not use it at the weekend.

\$6.00 x 10 = \$60.00 \$1.50 x 10 = \$15.00 Total = \$75.00 TravelPass = \$52.00

Discount = \$23.00 = 31% on \$75.00.

An average Blue TravelPass user might make ten 3-5 section trips and ten 1-2 section trips Monday to Friday and perhaps two more 3-5 section trips at the weekend.

\$2.60 x 10 = \$26.00 (weekday trips) \$1.50 x 10 = \$15.00 (weekday trips) \$2.60 x 2 = \$ 5.20 (weekend trips)

Total = \$46.20 TravelPass = \$27.00

Discount = \$19.20 = 42% on \$46.20.

These "generous" discounts might seem to validate the authorities' case.

However, in both these cases the price of each separate trip has a flagfall component in it, making the total cost for calculating the discount seem higher. If we treat the two trips as a single journey, as would be the case if the person did not have to change vehicles, then the discounts might possibly be:

# Purple TravelPass

\$6.60 x 10 = \$66.00 (ten trips St Mary's to, say, Glebe, if there was a train to Glebe)

TravelPass = \$52.00

Discount = \$14.00 = 21% on \$66.00

# Blue TravelPass

\$3.40 x 10 = \$34.00 (representing ten 6-9 section bus trips) \$2.60 x 2 = \$ 5.20 (two weekend trips of 3-5 sections)

Total = \$39.20 TravelPass = \$27.00

Discount = \$12.20 = 31% on \$39.20

A comparable case is a person travelling by train from St Marys to Sydenham, and having to change at Redfern. The separate fares are - St Marys to Redfern \$6.00 and Redfern to Sydenham \$2.20, a total of \$8.20. However, the fare from St Marys to Sydenham is only \$6.00, not \$8.20, as the passenger is considered to have made only one trip, not two. The discount on a \$39.00 weekly would appear greater if calculated on the \$8.20 two-trips basis instead of the \$6.00 one-trip basis.

# 72. Cash Single Bus Tickets

Some quotes from page 9 of State Transit's submission on Sydney Buses.

"Following a period where the cash single ride ticket market share increased somewhat, it would now appear to have stabilised at around 20%". We are pleased to see that it is lower, however State Transit has not said how low it should go. Is 20% acceptable? We don't know. Casual observation of people boarding buses would suggest that it isn't acceptable. We recommend that State Transit nominate a target for cash fares each year, and then report on whether or not they have achieved it. Perhaps it should be a Customer-Related KPI (Key Performance Indicator).

"State Transit will continue to monitor the impact of annual fare determinations to ensure that the proportion of on-bus sales remains at a low level." It is not only the annual fare determinations that have an impact on the proportion of on-bus sales. It is everything else that State Transit could do, but won't.

"From an operational perspective, a number of incentives exist to minimise the proportion .... etc". We know what the operational incentives are, but State Transit hasn't told us what the strategies are. STA's only lifeline seems to be the Integrated Ticketing system.

Far from requiring state-of-the-art computers to speed up bus boarding, our observer noted that most old-fashioned of devices, a queue conductor, assisting a large crowd of passengers to board the 500 series buses in Druitt Street on Monday evening 19th May.

# 73. A Range of Innovative Fare System Policies

On page 9 again we read "The new ticketing system will also provide the opportunity to consider a range of innovative fare system policies that cannot be supported by existing technology."

Not all enlightenment in the area of ticketing rests with State Transit. In APT's submission to the concurrent private fares enquiry, we reported on our survey of about 30 of the main bus companies in the Hunter – Sydney – Illawarra region and compared the ticket types with those available from State Transit. We recognise that no single private company offers any more than three of these tickets. Many offer two, or one, and some offer none at all.

Туре	Private	Government
Returns	Yes	No
Bus to bus transfers	Yes	Yes (1)
Ten Trippers	Yes	Yes
Bus Trippers	Yes	Yes
Day Rovers (with Rail)	No	Yes
Five-day weeklies	Yes	No
Ten-trip weeklies	Yes	No
Unlimited use weeklies	Yes	Yes
Combined bus-rail weeklies (zonal)	No	Yes
Combined bus-rail weeklies (point to point)	Yes	No
Stored value cards (2)	Yes (3)	No
Off peak discounts	No	No
Weekend discounts	No	No
Family fares	No (4)	Yes
Discounts below max. authorised single fares	Yes	No
Monthly tickets	No	No
Quarterly or yearly tickets	No	Yes
Inter-company transfers	No	No
Pensioner Excursion Ticket	Yes (5)	Yes (6)

- (1) Limited in Sydney, but the norm in Newcastle with Time Based fares.
- (2) Note that these tickets do not speed up entry. The passenger still has to ask for and the driver still has to enter a particular fare. This can cause traffic delays in the CBD during the afternoon peak hour.
- (3) One company gives incrementally larger discounts for more frequent use.

- (4) Apart from a tourist pass issued by Surfside in the Gold Coast Tweed area.
- (5) In one case only, where a private operator matches the P.E.T. available in an adjacent government area.
- (6) This largesse is offered, not by the STA, but by the state government.

# 74. Affordability Comparison

On page 11, the comparison of fares for a 4 km trip by different modes is not quite fair.

The submission says a single bus fare to Lilyfield is \$2.60, a TravelTen is \$1.89, and a Light Rail fare is \$3.60. This ignores the fact that a Light Rail weekly, allowing unlimited trips, costs only \$19.00. The round-trip monorail fare of \$4.00 is also mentioned, but the discounted fare of \$2.50 (sometimes \$2.00) using a multi-ride MetroCard is ignored.

# 75. Customer-Related KPIs - Comfort

We question whether "Comfort" is the appropriate heading under which the age of buses should be recorded. Some new buses, especially those smaller ones purchased by the private companies, are quite uncomfortable.

#### **OTHER NEW ITEMS**

# 76. Purchase of Season Tickets by Salary Deduction

CityRail used to staff a small office to assist large corporate and government employers to set up and maintain a program whereby employees could purchase yearly tickets by regular salary deductions. This was beneficial both to CityRail and the employees, and the cost of the "interest free loan" to employees was borne by the company.

To the best of our knowledge, this office was around for at least forty-five years but it has unfortunately been closed. We request that consideration be given to re-opening it, or establishing a similar office elsewhere to encourage and assist employees in the purchase of yearly rail and TravelPass tickets.

### 77. Sale of Bus TravelPasses at TVMs

CityRail Ticket Vending Machines sell TravelPasses that contain rail content – Red, Green, Yellow, Pink and Purple. They do not sell the Blue, Orange or Two Zone TravelPasses, although these can be purchased from ticket offices. Consideration should be given to making the full range of TravelPass tickets available through the machines.

### 78. CityRail Business RailCards

For a few years in the mid-1990s, CityRail had a ticket called Business RailCard. This ticket was purchased in a company name and could be used by anybody employed by that company.

The tickets came in three types:

- Gold, which covered all the CityRail area from Nowra to Newcastle, Goulburn and Lithgow. (Details of price not now available)
- Silver, which covered all the suburban area (Penrith, Campbelltown, Cronulla, Cowan, etc.) The cost of this ticket was \$2,070 for twelve months.
- Blue, which was a point-to-point ticket between two nominated stations, and all points in between. They cost 25% more than the individual non-transferable point-to-point periodical tickets. For instance, a yearly Blue Business RailCard between Burwood and Chatswood via the city cost \$1,098.75, which was 25% more than the individual price of \$879.

The tickets were still available in January 1998, but were withdrawn soon afterwards, presumably because they didn't sell well, although one never knows what are the real reasons behind anything that CityRail does.

We recommend that CityRail reconsider the market, design, price and publicity for such a product.

# 79. Service Fee for Lost Periodical Tickets

Before computer tracked tickets were introduced, CityRail had a fee structure for the replacement of lost TravelPasses that involved a small service fee for printing, plus an additional 10% of the unexpired value of the original ticket. The presumed intent of the additional fee was to insure CityRail to some degree against the possibility of fraudulent re-use of the replaced ticket.

With the introduction of computerised ticketing, the means exist to disallow and capture, at the barrier, tickets that have been replaced. An analogy can be drawn with banking cards. APT recommends that a flat service charge only should apply to the replacement of lost or stolen TravelPasses and FlexiPasses.

# 80. TravelTen Tickets to be Marked "Transferable"

In Item 39 of our first submission, we mentioned that TravelTen and FerryTen tickets are transferable, and can be used by more than one person boarding at the same time, and commented that this facility is not widely advertised.

We omitted to mention that this transferability is not even stated on the ticket itself. All the tickets that are "not transferable" say so, but the one that is "transferable" doesn't say so. We recommend (again!) that a statement to this effect be printed on the ticket.

# 81. Range of Concession Fares

We realise that concession fares are not the province of IPART, but we want to place on record here the complexity of the system.

The NSW Council of Social Services (NCOSS) has made a valiant attempt to list all the types of concessions (see the web site below). This covers seven pages and mentions seventeen different types of concession cards. And, of course, children under twelve, who don't need a card, make an eighteenth group. Pity the poor bus drivers!

http://www.ncoss.org.au/hot/transport concessions/transport concessions guide.pdf

# 82. I.T. and Communications Budget

We note with alarm that State Transit will reduce I.T. and communications expenditure from \$5.6 m in 2003/04 to only \$1.0 m in 2006/07, presumably because the ticketing system will be taken over by the Department of Transport. As mentioned elsewhere, we recommend caution about this new system rather than this unbounded optimism.

### CONCLUSION

### 81. Public Hearing

As usual I am willing, if required, to make a presentation or answer questions at the coming Public Hearing.

Yours faithfully,

Allan Miles Secretary Action for Public Transport (NSW)

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### **APPENDIX "B"**

#### SUMMARY OF PROPOSALS IN A.P.T.'S FIRST SUBMISSION – JANUARY 2003

- Speed up bus travel by encouraging passengers to use pre-paid tickets rather than
  paying cash to the driver. Methods include steep increases in single fares, minimal
  increases in TravelTen fares, no increases in TravelPass fares, new TravelSix or
  TravelTwo tickets, trial of a no-cash bus, ticket vending machines, publicity;
- Increase the price of 1-2 section bus tickets by 20% (\$1.50 to \$1.80) and 3-5 section tickets by 8% (\$2.60 to \$2.80). Increase longer distance single bus tickets by 2-3%;
- Improve marketing of the BusTripper ticket, to provide a lower cost alternative for travellers who do not wish to pay for the rail content in a DayTripper ticket;
- Retain current prices for TravelPass tickets following steep increases over recent years. TravelPasses have risen an average of 50% over seven years;
- Introduce a new Brown TravelPass Zone as an alternative to (but not replacement for) the Red TravelPass Zone. It would cover the eastern suburbs and inner western suburbs as far as Strathfield and Campsie, but exclude North Shore travel. It would overlap the existing Red Zone, and both tickets would be the same price;
- Increase CityRail fares by a maximum of 2 %, but no increase for TravelPasses;
- Introduce a RailTen product, similar to the bus TravelTen and the FerryTen, to provide casual rail users with a discounted ticket;
- Allow next-day use of the return portion of a return rail ticket;
- Increase single cash ferry fares by a nominal amount, but keeping FerryTen, TravelPass and Manly Jetcat fares the same;
- Re-introduce intermediate fares on Sydney Ferries for journeys that do not begin or end at Circular Quay, e.g. Greenwich to Birchgrove;
- Introduce an all-modes DayTripper ticket for government transport in Newcastle;
- Increase the price of the Pensioner Excursion Ticket from \$1.10 to \$1.50 or more. It has been the same price, except for the GST increase, for 15 years.
- Provide equitable availability of the Pensioner Excursion Ticket;
- Increase the commuter consultation in the design of the integrated ticketing system. At present, the commuters are having no say at all;
- Retain in the new system all the discounted tickets currently available;
- Invite greater participation in the IPART process by other government agencies, such as Dept of Transport, Education, DOCS, Planning NSW, etc.