

While I am generally supportive of the 5% proposed fare increase and more off-peak fares, I am somewhat shocked at what I see as the lack of independence in the IPART discussion paper and some of the recommendations, which go far beyond what I see as the IPART scope or what an independent body should be commenting on.

Opal Card versus Opal Connect and Passes

There are two fundamental features of the current Opal card

- Immediate fare feedback - fare charged and balance shown at the gate
- Cheapest fare - consumer doesn't need to think and know they will pay the lowest fare, with discounts and caps automatically applied

The second also applies to the current implantation of Contactless cards, the first does not due to the inability to write to or store information on your typical credit card or phone/ watch.

It is a retrograde step to consider the implementation of passes or the Opal Connect product, where the consumer needs to commit in advance, or choose between various passes on the basis of possible future travel.

Any discounts should be automatically applied without the consumer needing to pre-select a plan.

Fare integration

Fully support further fare integration, but not only making it available to Opal Connect users.

The current transfer discount mechanism is clunky, and provides a perverse incentive for passengers to switch modes before a fare band increase to reduce fares – eg. flipping between bus and light rail every 0-3km on say a Circular Quay – Kingsford journey (when that section opens)

In addition Trains/Metro do not have an equivalent 0-3km travel distance (eg. in peak there is a substantial price differential between Bus and Train from Kings Cross – City), and Buses do not have higher fares for substantial distances (most evident in the relative fares for Express Buses versus the Metro/Train from say Rouse Hill – City)

Somewhat disappointed that IPART did not provide a suggested mechanism for addressing fare integration. My suggestions would be:

- Switch rail fares to a true distance/ GPS rather than track measurement
- Introduce shorter band for rail, and longer bands for buses, ideally common across all modes
- Apply a surcharge for Ferry fares, and Peak Rail (and possibly Bus and Light Rail) reflecting the additional cost discussed in previous IPART reports

Fares for longer journeys and caps

On a Global scale of fare systems and transport operators, the Opal system covers a large distance. Most US/ European systems (many seemingly referred to in consideration for the IPART report) are substantially smaller in size, many to the point where they don't even need zones, and trips to Wollongong and Newcastle would definitely be under a separate Regional tariff if not a separate operator – and not included in any discounts etc.

Over preceding fare reviews, table simplification, and the most recent \$50 cap, NSW is now providing ridiculously subsidised medium-distance travel. This ethos needs to be reviewed – the core cost in public transport remains distance (whether via electricity or fuel, or drivers wages), as it is in the alternative from private transport. A comparison of equivalent journeys from outer London or even in China (eg. Hangzhou-Shanghai) would make this very apparent.

Unless a reasonable rate is charged for long-distance train travel, there is no chance of any business case for a faster/ high-speed service being successful, as it will be unable to charge sufficient fares versus the slower rail alternative.

Pensioner Concession

Once again the IPART report fails to even mention the single fare or cap, that has not risen for 10+ years, representing a very substantial decrease in real terms. While I support the extension of concessions to more disadvantaged groups, the \$2.50 fare caps need to be addressed:

- No or limited discounts during any peak period
- Increase in the cap for longer journeys (eg. for over 20km)
- Part of usual price increase mechanism going forward

Other public transport

Private operated buses (many regions), ferries (Sydney ferries) and light rail are part of the Opal system, yet there are some public transport routes that are not.

This includes

- Manly Fast Ferry
- Lane Cove Ferry
- The disbanded Elizabeth Bay – Circular Quay ferry

These services are seemingly operated at a profit (despite the additional costs of water services) by private entities at fares that are not dissimilar to single Opal fares. The government should negotiate to bring these entities under Opal – and would seemingly be paying far less of a subsidy than had they been carried under existing operators under Opal.

I note that this was not in the scope of the IPART report, but neither was the below.

Opal Connect – Technology and ticketing

While not part of the main discussion paper, I also came across an IPART paper entitled Technology and Ticketing, which surprises me. This appears to be a summation of a consultants report addressed to the NSW Government or TfNSW, and not something that an independent tribunal should be publishing.

The scope of Opal Connect seems to have been expanded from a product solely for a discount on an on-demand service to some all encompassing account based system even considering subscription pricing, which is informative as to how you read the main discussion paper.

There seems to be some consideration that the existing Opal system is inflexible or not sophisticated (or possibly Cubic will charge too much to implement). I cannot see any reason why a weekly backend process could not similarly be run against Opal cards and any additional discount applied as a credit.

Subscription Pricing is a retrograde step. While some consumers may be regular travellers, other consumers may end up paying too much if they get sick, have to travel interstate or change their usual journey. Technology through Opal enabled the elimination of this retrograde pricing mechanism, it is crazy to consider its reintroduction.

If a discount is wanted to be given to 3-4/day a week travellers, then it should be via a certain percentage discount after say 6 journeys.

Eliminating the need to top-up is also stated as a benefit of a subscription system – but it is no different to having automatic top-up on Opal like the majority do. For various reasons other people prefer not to have automatic deductions from their bank accounts.

Mobility as a Service I do not see as a particularly government role. NSW has been very forward with providing open APIs to transport operators and some of the third-party apps (eg. CityMapper) already provide possible combinations of public transport and rideshare services as suggested options.

I see zero rationale for the government to provide any subsidy to individualised car transport (eg. taxis, rideshares etc) or helicopters, limousines or airplanes – they do not have the same environmental or road volume reduction as public transport.

I could see some rationale to a subsidy being provided to e-bikes, bike shares or scooters as part of a last-100m/mile solution after a public transport trip (which minimises the disadvantage versus an individual car), but for the time being NSW's scooter and helmet laws make this mode undesirable for many.

Finally any Account based system has a major issue with Revenue Protection and Concession fares. Neither London nor the current Sydney system allow concessions on Contactless cards as the transit authority cannot tag a card with a concession feature or make it easily visible to revenue officers.