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Submission: In terms of the objectives IPART has set, there is no apparent mention of the way in which the lost revenue through non paying customers - which has been advertised as being 10% of the customers using the network across all modes - should be addressed. If it is open to IPART to make recommendations about what government can do to recover this lost 10% of revenue - other than through raising fares to the 90% of paying customers - then I would urge IPART to make such recommendations.

From my own experience, I witness daily, bus users who are travelling free on buses I travel on. I rarely see any official on board a bus (or train) checking people's opal cards. 10% of revenue must be a large amount of money, which would justify a greater presence of personnel whose objective would be to recover some of this lost 10% of revenue.

Light rail and metro services do not need to have a different set of mode-specific fares from those which exist for bus and rail respectively. The system works well enough as it is.

There should be off peak discounts for other modes than just rail; if you propose 40% off peak discount that should be applied to all modes, with the exception of ferries given they are the most costly mode to run.

The travel reward system should remain as it is; the only improvement you should make is to stipulate that to qualify for it, only the 2 most expensive trips taken each day, until the 8 trips are reached, will count, so that the reward is not reached until Friday of a given week at the earliest. This will discourage overuse earlier in the week by those seeking to reach the reward earlier.

The Sunday cap should be increased to \$5 for adults, and to \$3.50 for Gold pass holders ( which would be their daily cap as well).

Thank you