

Author name: A. Hill

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Submission: The change in the regular transport user cap from paying for the "first 8 trips" to the "most expensive 10 trips" is a bad idea for several reasons.

The 8-trip cap was a concession made because of the removal of weekly tickets and fare increases. Increasing this to 10 now is a "bait and switch" tactic. I note the report also neglects to discuss older pricing for any longer-term comparison against CPI from before Opal was introduced. The comparison with CPI over the longer term is a real concern, and I think its much more than the 8% "average" suggested.

The increased cap from 8 to 10 trips is going to back-fire. Commuters will have no financial incentive to use public transport every day of the week, so this will increase the incidental use of cars, e.g. on rainy days. I do not believe the modelling accurately captures this loss of incentive, so revenue collected from this change will not be as expected.

I strongly believe the cap should remain at 8 journeys. However I support the change away from "first" 8 journeys in that it encouraged perverse behaviours to minimise one's fares. That said, the method of refunding credit will likely cause some confusion and be seen as a way to increase funds held by Opal. I also think you could still implement a sensible "first 8 journeys" cap if just a couple of simple loop-holes were closed.

The fare increases are well above CPI, and while I see you're attempting to recover various costs, cost-recovery should be completely secondary to encouraging regular and consistent use of public transport. As the transport minister said a year or two ago, the aim should be to get more people *using* public transport more often. The wider economic efficiencies are more important than direct cost-recovery. Many users will face fare increases of 20% in real terms.

The multi-mode fare system seems complex, but it seems a difficult task to propose something better, and is a massive improvement over the previous situation. I'm still not sure I understand it fully, but trust it to be generally better for multi-mode users. One issue however is it appears a short peak-hour train-ride in the city after a very long bus-ride to get to the city may actually make for a surprisingly expensive addition over the bus-ride alone.

The concession caps are a huge increase compared to recent fares. I've spent time convincing over-65s to trust Opal, but now the pricing will rise some 25% over a couple of years, exactly as they predicted! Yet concession holders are often the least wealthy, and often have limited transport options due to licence limitations, mobility impairment, etc. There is also a risk of encouraging elderly people to continue driving as their ability to do so safely degrades.

For the state as a whole, direct cost recovery is less valuable than a highly used and appreciated public transport system.