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Submission: Amend the proposed "10 most expensive trips per week" to only the 8 most expensive trips per week.

The proposed measure to change the current cap from the first 8 trips per week to the 10 most expensive trips per week is justified in order to prevent the "perverse incentive for customers to make unnecessary short trips early in the week to qualify for the frequency discount and then travel for free the rest of the week".

This really only provides justification for the change to the most expensive trips (rather than first trips), there is no justification for the change from 8 to 10 trips.

All else being equal, for a full-time commuter, this represents a 25% increase.

Although there would be some offset for users with a shorter straight line commute, this is unlikely to make up the difference.

Example 1: a commuter travelling 65 km currently would be paying $\$6.46 \times 8 = \51.68 . To pay the same under the proposed scheme the straight line distance would need to be less than 25km - which is highly unlikely.

Example 2: A person travelling less than 3km would experience a fare increase from $\$27.04$ ($8 \times \$3.38$) to $\$33$ (10×3.30), i.e. 22% in 2016 (and 28% by 2018).

This proposed change would recoup losses from the "perverse incentive" AND also raise the cost of a weekly commute.

If the perverse incentive is to be removed, a simple change from the first 8 to the 8 most expensive trips should suffice. Implementing "the 10 most expensive trips" is an unjustified and substantial fare hike.