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28<sup>th</sup> December, 2015

Independent Pricing and Regulatory Tribunal  
PO Box K35  
Haymarket Post Shop NSW 1240

Attention; The Chair Person

**Re: Review of Public Transport Fares  
Draft Report, December 2015**

Dear Sir/Madam,

Please find attached my submission in relation to IPART's proposed changes to the eligibility and daily cap for the Gold Opal Card.

Yours faithfully,

[REDACTED]

**Submission to IPART regarding:**

**More efficient, more integrated OPAL fares**

**Transport - Draft Report**

**December 2015**

To the Chairperson,

I wish to make the following submission to the tribunal with particular reference to;

**Proposed changes to the eligibility and daily cap for the Gold Opal Card**

I consider that the report has made a major error in proposing that the Gold Opal card should only be made available to those persons who hold Pensioner Concession Card and NSW War Widow/er Cards, and to not allow Seniors to access the Gold Opal Card.

Self-funded retirees such as myself are doing exactly what the government is asking of the older community, that is, funding our own retirement and not being a burden on the wider community by living on the public purse.

As such, it is important that government acknowledge this by providing some small assistance by way of various types of discounts to aid them in the struggle to remain self-sufficient. By removing eligibility for the Gold Opal Card from Seniors it will impose a huge financial burden on a large part of the aged community that cannot be justified.

I understand that costs to all, including government, are rising and it is timely that there be a review of our state's transport costs.

*Conclusion*

I feel that IPART, in this proposal, is being totally unfeeling to the older community and almost as if they are spitting in my face. I am disgusted with this proposal to disallow Seniors access to the Gold Opal Card.

**Consistency in determining the linking of the daily cap.**

I agree that there has not been a rise in the cost of the Pensioner Excursion Ticket since 2005 and suggest that the proposed increase in the Gold Opal Card daily cap, which is to be set at 40% of the proposed new Concessional Opal daily cap is not consistent with the way other daily caps are calculated.

*Conclusion*

All caps should be calculated in a consistent way (and "logical" way as pointed out in Section 1.1 item 5) by linking them to the Adult Opal Weekday daily cap, not linked to the Concessional Opal Weekday daily cap.

**Minimisation of the impact on customers**

As a current holder of a Gold Opal Card, being eligible as a Senior, I am dismayed at the proposal by IPART to deny me access to the Gold Opal Card when one of your main

objectives as set out in Section 1.1 item 4 is to “minimise impacts on customers”. Your recommendation will mean that I could now face an increase in my daily fare cap from \$2.50 to \$9.00 being a 260% increase. This does not in any way appear fair and is a major impact on my meagre finances.

Neither IPART nor the Government can in any way justify how an increase of 260% could be imposed on any part of the community let alone Seniors, such as myself who are struggling to live on a fixed income with very little help from the community.

#### *Conclusion*

I urge you to reconsider your recommendation.

#### Eligibility for Gold Opal Card

Your report at Section 2.8.3 talks of “means testing” eligibility for the Gold Opal Card and also that some customers on relatively high incomes have access to the discount via the Gold Opal Card. This problem can easily be overcome to allow eligibility for the card to be extended to those persons who hold a Commonwealth Seniors Health Card, this card is already means tested by Centrelink. Therefore those on “relatively high incomes” would be excluded from having the card.

#### *Conclusion*

I consider IPART should reinstate eligibility for Seniors to hold a Gold Opal card or as an alternative allow eligibility for Seniors who hold a Commonwealth Seniors Health Card.

#### Daily cap for Gold Opal Card

I suggest that IPART re-assess the daily cap for the Gold Opal Card.

I propose that the daily cap for the Gold Opal card should be \$4.50 which is 25% of the Adult Weekday daily cap of \$18.00 (25% of \$18.00 = \$4.50)

This represents an increase of 80% over the current Gold Opal cap compared with your proposal of a 44% increase from \$2.50 to \$3.60.

My reasoning for this is as follows;

It has been stated in the report that in the last ten years, fares, except for the Pensioner Excursion Ticket, have risen slightly more than the CPI figure of 30% and other daily cap fees are to rise by a consistent 20%, now when this formula is applied to the Gold Opal daily cap, the following result is obtained;

the current Gold cap of \$2.50 plus CPI/fares rise of say 35% plus a rise of 20% in the cap ( $\$2.50 + 35\% = \$3.325 + 20\% = \$4.05$ ) it would rise to \$4.05. In order to be consistent, this could be “rounded off” to a figure of \$4.50 and would be consistent with being 25% of the Adult Opal weekday cap. I consider that this is a reasonable increase considering other rises and that this fare has not been adjusted for ten years.

#### *Conclusion*

The Gold Opal Card daily cap should be set at \$4.50

As for other aspects of the report, I will leave them for other people to comment as they do not affect me as much as those items I have mentioned above.

I look forward to a reassessment of the proposals for changes in eligibility and daily cap for the Gold Opal Card.

Yours faithfully,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]