

Thank you for the opportunity to provide feedback to the draft report on opal fares.

The integration of multimode journeys is a great idea and will be likely to encourage more people who do not live close to a rail station to consider travelling by public transport.

The change to the fee structure, distance bands and the removal of the free travel after 8 trips per week to pay for the 10 most expensive trips per week will be an incredibly unfair increase on outer Sydney residents commuting to the city by train 5 days a week. While the report suggests that more than 40% of rail customers would be paying less than they are now these are likely to be all inner city residents. The report suggests that around 10% of single-mode customers would face cost increases that are greater than 20%, these are most likely to be outer Sydney residents who will be expecting to pay almost 50% more from June 2018 than they do now if these changes are implemented.

The proposed new opal fare structure has an unfair negative impact on residents of outer Sydney suburbs and will greatly discourage these residents from using public transport rather than driving and will provide little or no incentive for regular travellers to make some trips during off peak periods.

As I understand it the free travel after 8 trips on the opal card was intended to be similar to the old weekly ticket that gave a discount to regular travellers. The proposed change to the opal fares to charge the 10 longest or most expensive trips per week unfairly impacts regular users who generally travel to and from work. **The opal card charges should be based on their total expenditure on the cost of their 8 most expensive journeys in that week rather than on the 10 most expensive trips in a week.**

The change in distance bands with the 35-65km band being broken up into a 35-45km band and a 45-65km band also unfairly impacts train travellers in the 45-65km region which is generally commuters from outer suburbs travelling into the city. **The distance bands should not be changed.**

The combination of these two proposed changes very unfairly causes a big increase in travel costs for people from outer suburbs who travel every day to the city. Under the proposed changes these commuters will have less incentive to travel by public transport rather than by car, and if they do continue to travel by train will be likely to be paying the weekly maximum charge each week even if they make a few off peak trips, so there will be little or no incentive for these commuters to change travel to off peak times.

For example

Currently a commuter travelling by train from Penrith to the city and return (35-65km) in peak periods 5 days a week for work would pay \$51.68 per week (8 times \$6.46). If they can make half of these trips during the off peak time the weekly fare is \$43.92.

Under the proposed new fee structure the full 10 trips a week must be paid for and the distance band changes mean that the commuter travelling by train from Penrith to the city and return (45-65km) in peak periods 5 days a week for work would be paying the weekly maximum of \$65 per

week from July 2016 increasing to \$70 per week in 2017 and \$75 per week in 2018 which is an almost 50% fare increase between now and July 2018.

If this commuter from Penrith was able to make half of their weekly trips during off peak periods the weekly fare from July 2016 would be \$60.04 increasing to \$66.32 in 2017 and \$72.24 in 2018 which is a 64% fare increase between now and July 2018.

So even with the off peak discount increasing to 40% there would be little or no incentive for a train commuter from Penrith travelling to the city 5 days a week to make some of their trips during off peak times.

To make the fare increase fair for outer Sydney residents who regularly commute by train the following should be considered.

- **The distance bands should not be changed.**
- **At the end of the week, frequent customers would receive a travel credit equal to the higher of:**

Their total expenditure on Adult Opal fares in that week minus the cost of their 8 most expensive journeys in that week,

OR

Their total expenditure on Adult Opal fares in that week minus a weekly cap amount.