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Submission: While I respect the purposes for which the IPART review is being conducted, I disagree with both the reasoning of much of the report and with the majority of its determinations. I outline my objections below.

1. The report is long-winded , particularly in its justification of price increases and reductions in incentives for frequent use of public transport. Discussion of socially optimal fares and similar render the report inaccessible for the general public.
2. The report seems to ignore a wider social benefit of public transport use in considering fares and increases in relative isolation. Any reduction or removal of incentive for the use of public transport is socially and environmentally short sighted.
3. The report seems to gloss over or window dress some very unattractive and grossly unfair price hikes. Consider the proposed increase in the daily cap from the current \$15 to \$20 in just three years! This is monumentally out of proportion to the CPI and cannot be justified.
4. The report is extremely insensitive to those affected by changes to long-standing ticketing arrangements, particularly the pensioner excursion paper ticket with its \$2.50 cap. Current government marketing material espouses the benefits of switching to OPAL, chiefly by reference to the maintenance of the current \$2.50 daily cap. For IPART, independent or otherwise, to propose such fundamental changes within six months of the removal of paper tickets seems ignorant in the extreme.
5. IPART should not be seeking to affect policy changes that place the government's fiscal interests ahead of needy groups such as pensioners. Tightening the eligibility criteria for the gold OPAL card targets those who are not necessarily able to absorb the costs.
6. IPART appears to be acting in the governments best interests, not the consumers, in its attack on the current 8 trips incentive to use public transport more frequently. Surely the number of those commuters seeking to front-end load their weekly trips is small ? Most commuters would not have time to do it. Any changes to a system system that will punish regular public transport users is not good policy - the draft report admits that many users will pay substantially more if the changes occur.
7. The proposed 'rebate' system to compensate those users making more frequent journeys through the week seems complex and confusing. I am not sure whether IPaRT has considered the utility of this suggestion nor considered how it will be received by the public. What is needed is a simpler system, and despite assertions to the contrary, the rebate is anything but simple.

I trust that this feedback to the tribunal will form part of a useful body of information that ultimately draws people and rewards people for the socially and environmentally responsible decision to use public transport.