

Dear IPART,

I would like to comment on your discussion of 'frequency discounts' (Chapter 7) in your Issues Paper "Finding the best fare structure for Opal - Public transport fares in Sydney and surrounds", in particular the Weekly Travel Reward (WTR).

One extremely significant factor which your paper has not considered, is that when Opal was first introduced, the Government tried very hard to convince commuters that under Opal they would be paying less than they were. They published tables comparing Opal favourably with then current weekly fares. The reason Opal compared favourable was to a large part due to the WTR. Even with the WTR, OPAL fares were more expensive than monthly and yearly tickets.

Your issues paper suggest increasing the number of paid journeys to nine or 10 (p 77). This would be a betrayal of the Government's claim that Opal would benefit commuters, now that there is no choice to return to periodic tickets. Providing weekend discounts to compensate would probably not benefit most commuters.

Furthermore, in the Issues Paper (p 71) you state:

*In the past, the frequency discounts were applied to the price of periodical paper tickets to reduce queuing at stations and the Government's ticketing costs. However, the introduction of Opal has addressed these issues.*

This implies that now that Opal is in place, it is the Government, not commuters that will benefit from the efficiencies.

If alternative or additional frequency discounts are being considered, I would like to suggest that large payments into one's Opal account (eg \$100 or more) would attract a discount. This would mimic the old monthly and yearly periodic savings.

Thanks for listening,

B Smith