First and foremost, the Government must / should define the role of the fare review and the policy that the Government seeks to adopt. Is it:

i). to address congestion on the roads (and future congestion) by encouraging the public to use public transport;

ii). for cost recovery - to optimise the fares for maximum revenue return; or

iii). for social inclusion - providing a public transport option for the majority.

Clearly it cannot be everything for everyone. However, it seems clear from reading this report that the prime objective is cost recovery. This is of deep concern, as it does not serve to address the future growing city and its associated transport issues.

Secondly, the report appears to compare the proposed fare restructure with the current Opal structure. However, the comparison should, in fact be with the status 'pre-opal'. This being the case, the majority of peak rail commuters will be worse off in comparison under the proposed changes, since weekly tickets accounted for almost 50% (see D below) of peak rail trips - who's fare was based on a multiplier of 7.37.
The current IPART proposal of the user being refunded for trips in excess of the 10 highest fares paid over the week will result in all these weekly commuters being effective 'losers' under opal.
Single and return peak ticket users will also be losers, purely based on higher fares.
In fact, relative to the old ticket system, (pre-opal) the only real winners will be the off-peak users.

Of course, there is a current loop-hole in the system that is being exploited by a proportion of the market. Whilst it should be acceptable to close this loophole, it should not be treated as an opportunity to hike public transport fares and improve cost recovery under a guise of fixing 'teething troubles'.

Third, the proposed increase in the daily and weekly caps are well in excess of CPI. This will result in significant real price increases. Is this Government policy? Increasing fares will certainly not meet the objective of increasing use of public transport.

Finally, there are a number of factually incorrect statements within the report, inter-alia:

- It is not true that the change in calculation of the distance bands will result in **'most'** single fares falling as the majority would still remain within the same band. (see A below)
- Increasing fares will not meet the objective of increasing use of public transport.

A. Distance Bands

Section 1.2 Fares states that "In addition, the distance travelled would be measured in a consistent way for all single-mode and multi-mode journeys. Specifically, it would be measured as the longest straight-line distance between any tap-on and tap-off point in the journey (as is currently the case for bus, light rail and ferry fares), rather than the route distance (as is the case for rail fares). These changes would mean that fares for most single rail journeys would fall."

However, due to our draft changes to fare structure, the impacts on customers would vary depending on which modes they use, how far they travel, and how frequently they travel. In 2016-17:

- Most multi-mode customers would pay less than they currently pay.
- Around 60% of single-mode customers would pay less than they currently pay.

B. Multi-modal trips

Only 15.2% of train users also used bus or light rail / ferry in the AM peak across the GMA[2] . For the Sydney Greater Capital City Statistical Area (GCCSA) this figure increases to 19%[3]

C. Trip Purpose

In the AM peak, work and work related trips accounted for 66.4% of all train users in the GMA[4].

D. Ticket Type

In the AM peak, weekly tickets accounted for 48.8% of all train user trips in the GMA. Singles accounted for 5.5% and returns for 19.5%[5].

Across the whole day (not just AM peak) periodical tickets (annual, quarterly, monthly and weekly – both mymulti and mytrain) accounted for 45% of all train trips, from 9% of ticket issues[6].

Pre-Opal Weekly mytrain tickets prices were based on a multiplier of 7.37 times the equivalent standard single fare[1]. ***Note:*** *the MyMulti3 was only $2 more than the maximum mytrain weekly.*

1. Table 19a, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2

2. Table 15, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2

3. Table 9, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2

4. Table 14, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2

5. Table 14, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2

6. Table 18, "Train Statistics 2014", Bureau of Transport Statistics website - http://www.bts.nsw.gov.au/Statistics/Train/default.aspx#tab2