

25 October 2013

The Chairman  
Independent Pricing and Regulatory Tribunal of NSW  
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Sydney NSW 2000  
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Dear Mr Boxall

## **Review of Fares for Metropolitan and Outer Metropolitan Bus Services from January 2014**

I write as an individual who is also a member of Action for Public Transport (NSW). I was heartened to read that APT had raised the deficiencies of the **Opal system** in its submission.

This independent submission is intended to:

- further support the focus on non-penalising cross-modal travel;
- provide some further rationale on why this should happen;
- illustrate that future tendering to operators should not be an impediment.

### **Interchanges are inconvenient; charging for changing is provocative.**

When a traveller wants to go from A to B, a single journey would be ideal. A broken trip at an interchange can be suffered, but why should the passenger be penalised further with a second flagfall? This point has already been made in APT (NSW)'s submission.

### **Public transport needs support; every mode change benefits private motoring.**

Good public transport allows many commuters to be productive, rather than individually steering their cars. Navigation is delegated to a single driver for the train or bus. This is a considerable efficiency. A mode change disrupts the workflow of a working commuter. It's unfortunate, but unavoidable. However, it is injurious to exacerbate the problem by charging for an unwanted change of driver. The driver here is not running a taxi; there is no personal service associated with embarking on the second vehicle, which already has a 'payload'.

### **Fare structure isn't a slave to statistics.**

The suggestion has been made that the government may wish to contract out certain transport services to various private operators, and that single fares for multi-modal journeys would cloud the figures for a potential purchaser. This need not be so. There is no need to confound trip statistics and fare structuring. Opal will always record the journeys made. Any operator can see the traffic available. A government committed to equity will not be afraid to apply its own 'flag fall' or other incentive structuring for the operator – from revenue – if it's believed important. Otherwise, the government is forcing commuters saddled with bad connections to bear the subsidy for a marginally 'profitable' operation.

(Mr) David Powell.