

Comments in Response to IPART paper on proposed changes to fare structure for public transport in NSW.

1. Nowhere in the document is there any consideration of the removal of the Travel 10 discount and the impact that this has, particularly on bus passengers who do not make 10 or more journeys per Monday-Sunday week. This change imposes a swingeing 20% increase in the fare currently paid by these passengers in a way that severely discriminates against them. Many of the claims in the report that passengers stand to benefit from some of the proposed changes are undermined by the failure to take this into account, and come across as disingenuous and misleading as a consequence.
2. The report's assertion that providing off-peak rail services can be done at a considerable saving to peak services, yet the same does not apply to buses, is not backed up with the numbers to support the argument. This lack of rigour undermines the credibility of the claim, which I would challenge for the following reasons: Off-peak bus services use buses that can be used all day, whereas peak bus services use only a proportion of buses that can be used all day and also require a fleet of buses that are idle during off-peak times. This is compounded by the fact that peak services are slower, increasing the size of the additional fleet required to provide bus services at peak times.
3. As off-peak bus services are generally not full, there is good reason to encourage greater usage of them by reducing fares at off-peak times. Given that many areas are not served by the train network (eg Northern Beaches), this inequity is also, in effect, discriminatory.
4. Currently bus trips between 3 and 20km are more expensive than the equivalent trip by train in peak hours. The price difference is exacerbated off-peak. The fares proposed from July 2016 close the gap for peak services but make it even wider for off-peak services. If it were a simple choice for the passenger to decide which to use, then this might be desirable, but as large swathes of NSW have no train services, it simply serves to discriminate against certain groups of citizens.
5. The last paragraph on page 24 states that the proposed weekly travel credit scheme will "mean that infrequent travellers and part-time workers benefit from cheaper fares." Whilst I see the logic in the argument, it fails to account for the fact that the withdrawal of Travel 10s means that these "cheaper" fares are still 20% more expensive than infrequent travellers and part-time workers are accustomed to paying.
6. The accuracy of the analysis in 2.6.3 on page 24 is flawed because it fails to account for Opal cardholders who use Travel 10 paper tickets for some journeys because they are significantly cheaper. This flaw may apply to other analyses on which the report is based.
7. There is a complete absence of any justification for the very large proposed increases in daily and weekly caps over the period the report covers. The weekly cap is to be increased by a whopping 25% and the daily cap by a staggering 33% between now and July 2018. These are seriously large increases that will hit those least able to afford it and no reason is provided for punishing passengers in a way that is unrelated to any meaningful index of inflation, such as the CPI.