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To: IPART Mailbox

Subject: Submission for Public Transport and Fares in Sydney and Surrounds Review

This submission concerns anomalies in the designation of Opal peak times for trains. The “How to Travel with Opal” brochure designates peak times as:

- “Sydney Trains: 7am-9am and 4pm-6.30pm;
- Intercity services: 6am-8am and 4pm-6.30pm.”

Factually wrong

Contrary to the provided information, peak and off-peak fares do not apply to actual trains but *to times when passengers join trains*, regardless of whether the trains they join are Sydney or Intercity ones. A person may join an Intercity Blue Mountains service in Emu Plains at 6.40 am to travel to Central, and he *will not* be charged a peak fare despite the fact that Intercity services are advertised as running on peak time from 6am onwards. The Department of Fair Trading website states that advertising “must not be misleading or deceptive... when it comes to prices, there is no room for ‘hype’. The information provided must be honest and accurate.” In this case it clearly isn’t accurate.

Unfair

A passenger who joins the 6.24am Intercity service in Blaxland in the Lower Blue Mountains to Central is charged a peak fare. At 6.40am (16 minutes and 3 stations later) that same train arrives at Emu Plains and a large number of people get on. Even more board 4 minutes later when the train reaches Penrith. By now the train is full, and none of the Emu Plains and Penrith newcomers on this Intercity train are travelling at peak rates. Only the small minority of passengers who boarded before Emu Plains are. The unfairness continues on the return journey; passengers both for Emu Plains and Blaxland board the 6.06pm train at Central. Both are charged peak rates. The train arrives in Emu Plains at 6.57pm and in Blaxland at 7.13pm. Both arrival times are outside peak hours, and the two sets of passengers spend 53% and 64% of their journey respectively outside of peak times, *yet both pay full peak fares*. Both are disadvantaged, However, Blue Mountains passengers are disadvantaged at a higher rate than their Emu Plains friends and unlike them, are disadvantaged twice each day.

Illogical

Surely it is *the train* which either is or isn’t a peak hour train, not random seats within it. Currently passengers from basically the same geographic region sit in adjoining seats in the same carriage, enjoying a pleasant conversation and travelling to the city together. One is travelling peak time and the other isn’t. Plainly nonsensical! Additionally, the concept of peak and non-peak fares doesn’t apply to bus and ferry travel at all.

Suggested Remedy

Ideally, boarding time segregated by station should not determine a passenger’s peak fare. If peak and non-peak rail fares are to exist at all, *they should apply to entire trains, not to individual passengers on them*. If this is difficult to program into the Opal system, one way to provide a statistically equivalent alternative would be to remove the peak and non-peak concept altogether for passengers boarding or disembarking beyond a 50 km radius from Central, and compensate them by reducing the standard fare for all travellers at all times beyond that radius, thereby providing fairness for long-distance commuters and removing the current anomalies.

(signed) Karl Karlov

This submission is not confidential