

These comments reference news (with urls) and the documents available from [http://www.ipart.nsw.gov.au/Home/Industries/Transport/Public\\_Transport\\_Fares](http://www.ipart.nsw.gov.au/Home/Industries/Transport/Public_Transport_Fares) and especially follow chapter 2 of the Draft Report available there.

Most of chapter 2 is fine, but the following sections have issues noted in this submission.

- 2.4 --- It is inconsistent to not have any off peak fare for all modes; just like the mode per km fare varies, so should the % off peak discount. It is good to increase rail to 40% but bus/light rail should be say 10%. Here is some evidence to support this:
  - Information Paper 2 on page 10 notes "Our analysis suggests that the socially optimal fare for bus and light rail services does not differ greatly by time of day" so "greatly" confirms the same 40% rail off peak discount is not appropriate, but surely a smaller say 10% or 20% discount would be fair and hence increase the satisfaction and off peak patronage of bus customers. Also the "Given that single fares are administratively simpler" concern really only applies to paper tickets; its hard to accept that the Opal settings for off peak rail could not easily be adopted to other modes.
  - There is already news of Bus/Light Rail congestion so before Light Rail is expanded off peak use should be encouraged.  
Note <http://www.smh.com.au/nsw/commuter-crush-more-trams-needed-to-cope-with-surge-in-light-rail-demand-20160120-gm9vse> which notes "afternoon peak travel period will also be extended by an hour to 7pm on weekdays, leading to a service every 10 minutes" so fares should reflect peak service frequency, and encourage users like UNSW students to perhaps change travel times.
  - <http://www.smh.com.au/nsw/opal-loophole-closure-to-make-travel-more-expensive-for-most-sydneysiders-20160110-gm2pn9> ends with "An extensive survey of commuters by Roy Morgan for the tribunal, released last month, showed people ranked frequency of services as a factor most likely to increase use of public transport, followed by shorter travel times, cheaper fares and more reliable services." so since off peak has lower service frequency then its important to balance this fairly with cheaper fares.
  - Section 2.6 gives a fair argument for changing frequency discount, and claims that customers who make 10 or more journeys per week could mitigate the impact of proposed changes by shifting journeys to off peak. However as per draft report this is only possible for rail customers, so off peak for at least bus/light rail services as well would strengthen this mitigation argument.
- 2.3 -- Fares indeed should increase with distance travelled, but it should be noted if the number of bands should be monitored & reviewed. 10 Fare Distance Bands seems a reasonable start, but is 5 simpler or 15 fairer & more efficient? It should help to have radial maps at major tap on points such as train stations with 10 coloured concentric circles to show how far a fare band would take a customer, which will help with a transition to this new system.

Such maps are easier to implement if all modes and multi mode journeys have the same band distances to determine applicable fares

- 2.6 -- Information Paper 3 about frequency discounting wisely lists 4 principles on page 7, but neglects to note that as implied by the Roy Morgan research customers value frequent services, so ideally the highest frequency services should attract the highest fares.
- 2.7 -- The proposed cap changes are not the best response to the concerns raised; for example they violate the "Signals about the relative costs of providing public transport should be maintained where possible" principle noted in 2.6 reference above. Table 2.1 in section 2.2 follows the principle that multi mode fares incorporating ferry fares should be priced differently so this should be true for weekend caps where the evidence (eg Information Paper 4 graphs) shows ferry trips are a major problem; there is no data shown for other modes. I personally experienced a recent full Watson's Bay Ferry when there was plenty of space on the alternative 325 bus service. Since customers can & need to get used to different multi mode fares involving Sydney Ferry trips, they can & will also adapt to a different cap if a ferry is used instead of a bus. Currently the Sunday Cap is set the same as the Gold Opal cap; this principle could be maintained on Sundays for customers who do not use Sydney Ferries, and extended to the new proposed Saturday Daily cap. However, bus service frequency is better on Saturday than Sunday/Public Holidays, so a slightly higher Saturday cap is fairer. Hence, although its already noted that cap changes should be monitored, a better starting point would be, for example, to set
  - Saturday Cap at 30% of Adult Opal Weekday cap
  - Sunday & Public Holiday cap should be 20% of Adult Weekday cap
  - Both these % limits would rise by 20%, to 40% and 50% if a Sydney Ferry trip is done.
  - This requires a change in Opal's definition of a weekend day, since Saturday service is not the same as Sunday or Public Holidays.
- 2.8 --- The use of a 20% Sydney Ferry supplement could mitigate the impact of tightened Gold Opal access, Its fair & wise to link all fares to Opal Adult Fares, so Concession, Adult & Gold Sunday caps could all be 20% of the Weekday cap, with perhaps Gold customers exonerated from the Sydney Ferry Supplement. Its important to also keep total cost low for couples=families without children, since otherwise more relatively empty cars will be driven, and other news suggests older drivers may have greater accident risks. Such a family is facing roughly triple not double the current total fare for Sunday travel.
- 2.9 --- If a customer provides photo ID proving that they live outside the Opal area, or advice from Opal support that they lost & blocked their Opal card, they should not have to pay the 40% surcharge for a paper ticket.

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