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Submission: Thanks to IPart for publishing its draft report and seeking submissions. It is clear that the NSW government intends to encourage the use of OPAL across different modes of transport. The proposed integrated fare structure for commuters who switch between trains, buses, ferries or light rail is a logical step that should have been introduced from the beginning.

However

1. It is not so clear why there is still disparity between these different modes of travel. So for example, rail journey has an off-peak structure but bus journey does not ???
2. It is not clear why a long distance journey on bus is considered to be more than 15 kms and a long distance journey on train is 4 times more ie 65 km. In a city the size of Sydney, 15 kms is not a "long" distance to be paying maximum fare. So if I travel from Kellyville to Parramatta by bus, I pay \$4.50 as I just travel more than 15 kms. But if I travel from Kellyville to the city (35 kms), I still pay \$4.50 for this trip !! And if I travel by train the same distance (35+ kms) I pay \$7.00 by train.
3. It is not clear why the government is backtracking on what it sold the system as. OPAL was "sold" as a more CONVENIENT and CHEAPER system for commuters. Yes, it was a little cheaper if you were charged for 8 trips and travelled 9 or more trips a week. And much cheaper for those who made shorter trips early in the week ie the misuse. But why the recommendation to charge for 10 trips. If misuse has to be stopped then charge for the costliest 8 trips instead. Commuters who abide by the rules would not suffer and pay AT LEAST 20% more. Would IPART make it transparent and publish comparison fares before OPAL was introduced especially for loyal commuters ie weekly/monthly/quarterly fares and after for the proposed fares?
4. It is not clear why all paper tickets are being taken away. Yes, paper tickets could have been a little more expensive (say 10%) than OPAL but taking away all paper tickets takes away all the flexibility that the system had for infrequent travellers and those who wish to use their own vehicle when required.

The government, of course wants people to switch to public transport. The question that should be asked is why traffic on Sydney roads is becoming worse by the day. There are thousands of people who probably don't care about public transport and take their own vehicle, even if in some cases, it means paying a little extra (we should not take into account fixed costs of vehicle ownership). The measures proposed are going to encourage more people like me to shun public transport.

Request to please reconsider the above issues.