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Submission: A lot of good things are planned in this draft decision. I'm overall very happy with it.

A few points:

I love the removal of the Gold Card from those with only a Seniors Card but why not go the whole hog and have them revert to an adult Opal? Is that based on any kind of analysis of a greater price elasticity for these people? I further think that the only way such a change would survive the political process is if existing holders of Gold Opal Cards registered against Seniors Cards are grandfathered in, perhaps until 30 June 2019 or until a grace period (I suggest three months) after they turn 65, whichever comes first.

Also on social disadvantage issues, why is it that you must be on the maximum rate of Newstart to qualify but any part pension gives you a pensioner concession card which also qualifies? The latter isn't likely to change and is beyond the reach of the NSW government but the former is within the reach. I would also like a streamlined application process where anyone who applies can have the concession Opal applied to their existing Adult Opal rather than needing a new card. The different card colours serve no purpose (with the possible exception of the Gold Card) since entitlement to a concession needs to be demonstrated. This is a social welfare issue as well as an administration one as it takes time for the concession card to be sent out during which you need to pay a higher fare. I think you should also include those on a waiting period for Newstart.

In spite of the decision not favouring removing peak journeys from the Gold Opal journey cap, I still feel that a price signal for the 8000 or so (4% of 200000) journeys in peak per day on the capped Gold Opal is appropriate, even if it is only very small such as 50c. A higher cap in the case where the card is used in the morning peak may be more palatable than not including the fare in the cap.

I don't really see the value in keeping the differential flag falls between modes but I accept that is unlikely to change.