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Date of submission: Thursday, 4 February 2016

Submission: Hello,

I would like to address your draft decision regarding Discounts for Frequent customers as detailed in sections 1.3 & 2.6. Specifically, the proposal to raise the current weekly cap of 8 paid journeys to 10.

The argument made for this change is that it 'Removes the perverse incentive for customers to make unnecessary short trips early in the week to qualify for the frequency discount.

It should be noted however, 'perverse incentive' referenced is as a direct result of charging based on the timing of the journeys during the week rather than the cost of the journeys. This has *nothing* to do with whether or not the cap is at 8 or 10 journeys. It is entirely possible to retain the journey cap of 8, whilst still utilising the proposed weekly credit scheme. This would still have the effect of removing the 'perverse' incentive, whilst not punishing the typical Mon-Friday commuter.

This is by far the biggest issue with your proposed change- The raising of the cap to 10 journeys. Much of the promotion of Opal over paper tickets was focused on this travel cap incentive. Indeed, despite significant savings achieved by purchasing Monthly Quarterly or Yearly tickets, commuters were forced away from these cheaper options and onto Opal, with the promise that most commuters in general would be better off.

By raising the cap to 10 journeys, you affect the bulk of commuters, thus in fact making most commuters *worse off*, in direct contradiction of earlier government assurances. Whilst it is argued that the efficiencies gained from Opal should now be spread among all commuter types, (thus lowering the price of single journeys), this ignores the fact that the most frequent commuters are responsible for the bulk of fare revenue. It makes little sense to incentivise costs to attract infrequent users, whilst punishing those whom make up the bulk of the transport systems patronage.

Indeed, even if there are minimal efficiency differences between infrequent and frequent commuters, frequent commuters still provide a stark benefit to the transport system- Namely by way of the large amounts of prepaid transactions loaded onto the opal cards of each and every frequent commuter. The amount of interest that would be generated by these prepaid funds would not be inconsiderable, and should be considered when determining incentives for frequent commuters.

In conclusion, the proposal to raise the weekly cap of 8 trips to 10 will result in nothing more than massively increased costs to the bulk of commuters, far in excess of what might be 'saved' through the proposed lower individual fares. This is in direct contradiction of the previously promoted advantages of the Opal system, and simply results in any efficiency savings generated by Opal being funneled to government revenue rather than customers. As such I strongly urge you to reconsider this proposal.

Regards,

T. Bargh