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Submission: My comments are as follows:

1. Utilisation of buses outside of peak hours, particularly in suburban areas is very low. The same off peak discount as applies to rail services should be considered and modeled as more patronage may increase revenue and relieve pressure on traffic and parking. The same may also apply to ferry services, but I am not familiar with them.

2. The rates for buses, trains, light rail and their multi mode combinations are generally within a few percent of each other. The exception is peak hour short train trips (less than 3 Km). Find an appropriate level for 0-3 km journeys and apply the same rate to trains buses and light rail.

3. The 10 journey maximum weekly charge will be significantly more costly for people who previous used weekly rail tickets for a commute on Monday to Friday only (ie they only made 10 trips anyway). Especially if they live in outlying areas. A sliding scale could be considered

eg 9-10 journeys = weekly cap of 8 most expensive

11-15 journeys = weekly cap of 9 most expensive

16+ journeys = weekly cap of 10 most expensive

The cap can also be incrementally applied but this may be confusing.
for people making less than 10 journeys a week