Dear Sir/Madam,

I am writing with a number of points for consideration at the Review of CityRail Fares. I will address a number of few issues raised in CityRail's submission focussing on productivity and customer service. While I am not directly against proposed increases, I believe CityRail has only provided a weak case in their submission and in particular have not provided misleading data on customer feedback and minimal data on productivity of their service in general.

I shall start with the easiest. In section 3.5.6, CityRail provides statistics on the number of days to “close” a customer feedback case. This statistic is meant to mislead unless read carefully. Once read carefully, it is possible to recognise it is completely useless. They define “close case with customer” to be “contact a customer who has made a complaint and provide and explanation or apology”. In my recent experience of two such contacts with CityRail, I have received a response in roughly the time indicated. In the first case, the response only partly addressed my concern and only the superficial was addressed. In the second case, the response did not address to my complaint at all but rather provided some canned response to what would be a common related issue. What's more, the response gave instructions which I had already followed but were wrong. That was in part the complaint. So in summary of this point, CityRail seem to “close” a case by fobbing off the complaint.

It seems that part of CityRail's argument for a price increase is the need to pay for expansion and upgrade. Where expansion or upgrade improves the productivity of current users' service, it would be fair that those customers accept a price increase. Such a price increase should be in line with the improved productivity. Where no producitivity improvement occurs, it is a maintenance issue and it is hard to justify a price increase. Such a cost should already be factored into the current pricing structure. For example, the use of rolling stock ought to be already factored into the price of a ticket – including the life of that ticket. Replacement rolling stock is simply due to the end of life of current stock, and such costs should already have been factored into the price of a ticket. Where expansion or upgrade is providing new services, such as additional rolling stock or new lines, new passengers should provide an income stream to pay for those expansion costs and no price increase is warrented to current passengers.

Cityrail also make a significant point about the percentage of revenue from tickets compared to government. It is fair that non-users contribute to the rail system, as they benefit too. For example, it keeps others off the road. It is in non-user's interests and the interests of the state to have as many people as possible on trains. CityRail effectively make this point themselves in section 2.6 of their submission. It is in NSW's best interests to encourage as many people onto rail as is possible and one could argue that perhaps even a fare decrease would do this! CityRail also point out that a third of all tickets are concession. This clearly decreases their fare revenue. However it is a government policy decision to provide concession and that should be funded by the government, not other rail users. This should call into question any “farebox revenue” statistics.

Lastly, let me turn to KPIs, productivity of services and “on-time running”. When it comes to productivity of a train service, there seem to be three major issues :

1. Services runs to timetable
2. Journey times are as quick as possible
3. Services run at convenient and productive times.
4. Able to get on to these services.

When it comes to trains, this means that a train that leaves and arrives at the advertised time, that it makes the journey as quickly as possible, they leave at convenient times and passengers can actually board the train. Of course the service to any one individual needs to be balanced against the service to others and the cost of providing that service. So these three points need to be balanced across all services, not optimised for one individual.

However from the statistics I've seen, CityRail focusses on only one of these four points, that services run to timetable. They do so in their “on time running” and “cancellation” statistics. Occasionally capacity statistics are available, but I have not found them in their submission and only see them occasionally in the press. Their submission mentions other KPIs but none of these are public and their submission does not argue for any productivity improvements other than on-time running and service cancellations.

I would also argue that there is evidence that the focus on running to timetable through on time running and cancellation statistics is leading to impovements in these statistics at the cost of decresed efficency on journey times and the ability to get on services. On journey times, I have three points of evidence of this:

1. **Changes during South Coast Trackwork**. Under the normal timetable, a train leaves Como at 8:29 and arrives at Central at 9:07. During track work on the South Coast for the school holidays, this train leaves Como at 8:36 and arrives at Central at 9:10. The same train takes 4 minutes less. Take roughly 700 people on the train, this improvement is of the order of 46 people hours. Why can't this be achieved outside trackwork?
2. **Different travel times for same stopping patterns**. Considering the normal timetable, once again, take the 8:29, arriving at Central at 9:07. This is a total travel time of 38 minutes. The 7:11 has the same stopping pattern and arrives at Central at 7:44, 33 minutes travel.
3. **Comparison with previous timetable**. The May 2006 timetable for the Eastern Suburbs & Illawarra Line clearly introduces longer running times over the previous timetable. While on-time running appears to have improved, it is at the expense of scheduled travel times.

The reality of the 2006 timetable on the Illawara line is that trains have significant waiting time at particular stations because of slack in the timetable. They have and do use this to argue customers should pay more. So customers are paying more to wait on trains. In my experience, while services were more often late under the old timetable, they were still faster than an on-time service under the new timetable. To push this trend to the extreme, this leads to slow trains that run perfectly to timetable. The on-time KPI looks wonderful but the timetable is inefficent and unproductive. This statistical slight of hand should not be rewarded with fare increases as it has a real impact on customer journey times.

I am also worred by one other aspect of on-time running as currently quoted. Trains are either “on-time” or “late”, and this could lead to peverse behaviour.

Consider this scenario. Train A is running 10 minutes late. Train B is behind A and is an express. It is timetabled to arrive in the City 4 minutes after train A. Clearly then, train B is also going to be late (by at least 6 minutes) – that is both train A and train B will be “late”. However, say there is a solution that allows train B to pass train A, and so be on-time, but this is at the expense of making train A a further 3 minutes late. As train A is already “late”, then for the sake of the on-time statistics, train A can be “sacrificed” to 14 minutes late to keep train B on-time. I'd be disappointed if this was CityRail policy, but the current KPIs encourage this behaviour. I have also experienced sheduling behaviour that appeared to do just this, sacrifice a late train to maintain another on-time train.

One final concern which carries on from the last. Once KPI like on-time running has been broken, there is no incentive to minimise the delay of passengers. What is the cost in person hours of a particular delay? Whether CityRail's takes mitigating actions and what those actions are can effect the cost greatly. This ought to be captured.

I also mentioned the ability to actually get on services, CityRail's own statistics I've seen in the press point to near or over capacity trains during peak times. This further delays people's journey time yet this delay is not captured.

As I've indicated, I'm not totally against the currrently sought fare increases. I am against CityRail producing figures that aren't worth much and I don't think they have justified an increase. At the least, I wish to encourage the tribunal to place conditions on future CityRail fare increases that seek further improvements in meaningful KPIs. In particular, KPIs that include travel time and measure person hours of delay may be useful. Perhaps there should be target travel times for trips from each station to the City for peak and off-peak times. Once travel time targets are determined, delays could be expressed against the targetted time and not the timetable time.

I appreciate your hard work in this area in previous years and thank you for reading this submission. I look forward to seeing the 2007 review.

Yours sincerely,

P. Tyler