

Action for Public Transport (NSW)

PO Box K606
Haymarket NSW 1240
<http://www.aptnsw.org.au>

25th September 2006

Mr James P. Cox
Chief Executive Officer
Independent Pricing and Regulatory Tribunal of NSW
Level 2, 44 Market St, Sydney NSW 2000
PO Box Q290, QVB Post Office NSW 1230
transport@ipart.nsw.gov.au

Dear Mr Cox,

Determination of Bus Fares (including TravelPass)

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1. Introduction

We appreciate the opportunity to provide input to the current review of bus fares. This submission responds to matters raised by the Ministry of Transport and the Bus and Coach Association, and also raises other matters for consideration by the Tribunal.

2. Executive Summary

(a) APT Recommends No Fare Increases

At any other time, the Ministry's proposal – seeking a CPI rise of 3 to 4%, evenly spread across all products, and no further reduction of discounts on multi-ride tickets – might have raised little or no objection from Action for Public Transport.

However, today, when rising petrol prices are causing many motorists to abandon their cars in favour of public transport for the trip to work, does not seem the appropriate occasion to increase fares, no matter how justifiable the case in an accounting or economic sense. Motorists who have changed to buses may feel as if they have jumped out of the frying pan into the fire, and prospective converts could well be deterred.

We therefore recommend no fare increases, as a means of winning and keeping passengers.

(b) Conformity With State Plan

A commitment to no fare rises would also meet the requirements of the State Plan, which prefers a broader public benefit to a segmental accounting exercise.

(c) State Transit's Increased Fuel Costs

While there has undoubtedly been a large rise in State Transit's fuel costs, there are compensating factors:

- STA's fuel hedging strategy contains the actual increase (refer IPART 2005 Determination, Section 3.1);
- The motorists fleeing to buses have, to a certain extent, been accommodated on existing services. That is, additional revenue at little additional cost;
- Some of State Transit's fleet is gas powered, and gas is a domestic resource unaffected by world oil prices.

(d) Influence of 2007 Election on Ministry's Proposals

We suspect that the Ministry's reluctance to ask for larger increases and reduced discounts may owe more to the coming election on 24th March 2007 than to any concern about passengers' pockets. Could it be that any large rises are being deferred until after the election?

(e) Possible Discrepancies in Ministry's Calculations

There is also an apparent discrepancy in the calculation of some new fares. The CPI increase has been applied to the 2006 actual ticket price, instead of to the 2006 master fare, resulting in two fares being "double rounded up" and over-charged ten cents, and one fare being under-charged ten cents.

(f) Inadequate KPIs in Ministry's Submission

Some Key Performance Indicators (KPIs) may be irrelevant at best, and perhaps misleading, while other more useful KPIs are absent.

(g) Ministry's Proposals Are Self-centred

The Ministry's proposals are centred on the needs of the two parties to the contracts. Any consideration of the customers, the overall public transport system or public benefit is almost an afterthought.

(h) Source of Funds

The additional funds needed by public transport for capital works and operations should come from other government sources. Better public transport in Sydney provides benefits to people throughout the whole state, and not just to the people riding in the buses and ferries.

3. Fuel Price Increases for Motorists

Public transport patronage in Sydney has been increasing since the price of petrol started to rise steeply last year. This has been extensively reported in the newspapers and even in the Ministry's submission (page 6).

The internal accounting of State Transit and the internal logic of the Ministry of Transport may well justify a fare increase. However, if we look outside the rounds of the cashbook and the journal, the proposal is ill founded.

The proposal also shows some lack of marketing nous. Just when your competitors' prices are driving their customers to your door, you put your prices up!

4. The State Plan – "A New Direction for NSW"

The draft State Plan issued by the Premier, Mr Iemma, on 8th August 2006 calls for co-ordination across all departments towards common goals. One of the priorities is: "public transport increases its share of peak hour commuters" (page 27). While we would have preferred that the priority should extend to more than just peak hour, it is nevertheless a good start. Increasing fares is hardly the right strategy for achieving this goal.

5. Single Bus Fares

The Ministry's proposals for single adult fares are as follows:

Sections	2006 Ticket Prices	New fare if CPI increase 3.8% applied	MoT's Proposed 2007 Ticket Prices (rounded)	Amount Increase	Percent Increase after rounding
1 to 2	\$1.70	\$1.76	\$1.80	0.10	5.9%
3 to 5	\$2.80	\$2.91	\$2.90	0.10	3.6%
6 to 9	\$3.70	\$3.84	\$3.80	0.10	2.7%
10 to 15	\$4.50	\$4.67	\$4.70	0.20	4.4%
16 +	\$5.40	\$5.61	\$5.60	0.20	3.7%

The proposal to increase fares by the CPI is unremarkable in itself. However, we have two objections.

Our first objection is that, although the proposed increase is probably justifiable on internal accounting grounds, it is not the appropriate corporate or social response in the current “petrol price” climate.

The other objection is the apparent double dipping in some proposed increases by basing the CPI increase on last year’s rounded up fare, and rounding it up again.

These two objections are discussed in detail elsewhere in this document.

6. The Master Fare Scale

In the table in Section 4 above, the Ministry’s application of a 3.8% CPI increase to the 2006 fares has resulted in odd amounts, which have been rounded up or down to the nearest ten cents for convenience. This is fair enough. But the 2006 fares on which the increases were applied are themselves the results of rounding last year.

According to the previous year’s IPART determination (Appendix 4), the fares are as follows:

Sections	2005 Ticket Price	2006 Master Fare	2006 Ticket Price
1 to 2	\$1.60	\$1.66	\$1.70
3 to 5	\$2.70	\$2.79	\$2.80
6 to 9	\$3.60	\$3.73	\$3.70
10 to 15	\$4.30	\$4.45	\$4.50
16 +	\$5.30	\$5.38	\$5.40

If this year’s 3.8% were applied to the 2006 Master Fare scale (rather than to the actual fare scale), the new 2007 Master Fares and rounded ticket prices would look like this:

Sections	2006 Master Fares	New fare if CPI increase 3.8% applied	Previous column rounded	Ministry’s Proposed 2007 fares	Discrepancy
1 to 2	\$1.66	\$1.723	\$1.70	\$1.80	Yes (over)
3 to 5	\$2.79	\$2.896	\$2.90	\$2.90	No
6 to 9	\$3.73	\$3.872	\$3.90	\$3.80	Yes (under)
10 to 15	\$4.45	\$4.619	\$4.60	\$4.70	Yes (over)
16 +	\$5.38	\$5.584	\$5.60	\$5.60	No

It would appear that in the first and fourth bands, the passengers would be overcharged, and it is precisely to prevent this double dipping that the master fare scale exists. In the third band there would be an under-charging.

Applying the CPI percentage to the former Master Fares gives increases in single ticket prices of 0, 10, 20, 10 and 20 cents in each of the five bands respectively. Applying the percentage to the current ticket price, as the Ministry has done, gives increases of 10, 10, 10, 20 and 20 cents in the various bands. While the Ministry’s approach is much neater, it defies the spirit of the Master Fare scale. It also defies the Tribunal’s decision in the previous review that “Fare increases in subsequent reviews will be applied to the unrounded prices” (Section 5.1)

We recommend that the calculations be revised to ensure that any proposed increases are based on the 2006 master fare and not the 2006 rounded ticket price.

7. TravelTens

The Ministry's proposals for adult TravelTens are as follows:

Sections	2006 Fares	New fare if CPI increase 3.8% applied	Proposed 2007 Fares (rounded)	Amount Increase	Percent Increase after rounding
1 to 2 (Blue)	\$13.60	\$14.12	\$14.10	\$0.50	3.7%
3 to 5 (Brown)	\$22.40	\$23.25	\$23.30	\$0.90	4.0%
6 to 9 (Red)	\$29.60	\$30.72	\$30.70	\$1.10	3.7%
10 to 15 (Green)	\$36.10	\$37.47	\$37.40	\$1.30	3.6%
16 + (Orange)	\$44.20	(\$45.88) *	\$44.80	\$0.60	1.4%

* The increase in the Orange TravelTen price is 1.36% (lower than the CPI) in order to bring the discount (currently 18.1%) up to the standard 20%.

Again, these proposed increases are unremarkable in themselves, but the Tribunal should confirm that the Master Fare scale has been used correctly.

The 2006 Master Fare is the same as the 2006 Ticket Price for each ticket (Appendix 4, IPART Determination), so a percentage increase applied to either now would produce the same result. However, from 2007 there will be two scales – the raw Master Fare and the rounded Ticket Price. In the 2008 Review, increases should be calculated on the 2006 Master Fare and not the 2007 Ticket Price.

The Tribunal also needs to assess whether the appropriate corporate or social response in the current "petrol price" climate ought not to be a zero increase.

8. TravelTen Discounts

Under the Ministry's proposals, the discounts on TravelTens would be as follows:

Sections	Proposed 2007 TravelTen prices	Proposed 2007 single fare prices	Proposed Single fare x 10	Proposed Discount Amount	Proposed Discount Percent
1 to 2 (Blue)	\$14.10	\$1.80	\$18.00	\$3.90	21.7%
3 to 5 (Brown)	\$23.30	\$2.90	\$29.00	\$5.70	19.7%
6 to 9 (Red)	\$30.70	\$3.80	\$38.00	\$7.30	19.2%
10 to 15 (Green)	\$37.40	\$4.70	\$47.00	\$9.60	20.4%
16 + (Orange)	\$44.80	\$5.60	\$56.00	\$11.20	20.0%

The Ministry's proposed increase maintains or standardises the TravelTen discount at approximately 20% of the cash fare price. The Tribunal has said previously (2006 determination, Section 1.1) that 20% is the maximum discount that can be offered. APT does not accept this as the last word, and may pursue greater levels of discount at another time.

It also worth noting that the Ministry, after pressing for a maximum 15% discount on TravelTens for two years, has suddenly gone quiet on the matter, and is not objecting to the 20% discount being retained. We suspect that the state election due in March 2007 may be contributing to this reticence. Perhaps the battering rams have not been dismantled, but merely put away until after the election.

9. TravelPasses

The Ministry proposes increases for non-rail TravelPasses only as follows:

	Current Price	Current Master Fare	Proposed New Price	Amount Increase	Percent Increase
Blue	\$30.00	\$30.02	\$31.00	\$1.00	3.3%
Orange	\$37.00	\$36.96	\$38.00	\$1.00	2.7%
Pittwater	\$51.00	\$50.98	\$53.00	\$2.00	3.8%
Two Zone	\$30.00	\$30.02	\$31.00	\$1.00	3.3%

Prices of TravelPasses with rail content were increased in July 2006 and will not change now.

Because the current actual prices and master fares are so close, the CPI percentage could be applied to either with little difference in the result.

Again, if internal accounting were the only factor to be considered, then the proposed increases would be unremarkable.

For ten years or more, reports and submissions by State Transit, the Ministry of Transport and various inquisitors have railed against the “excessive discounts”, “generous discounts”, “abuses of discounts”, etc available to users of the popular TravelPass ticket.

In the August 2003 Interim Parry Report, the term “discount” is prefaced on seven occasions by the terms *heavily*, *heavy*, *significant*, *unsustainably high*, *excessive*, or *very large*.

But this year, not a peep. Maybe next year, after the election?

For the record, the history of TravelPass prices is as follows:

	1990	2005	January 2006	July 2006	Ministry Proposal Jan 2007	Increase over 17 years	Average Increase per year
Blue	\$13.00	\$29.00	\$30.00	\$30.00	\$31.00	138%	8.1%
Orange	\$17.70	\$36.00	\$37.00	\$37.00	\$38.00	115%	6.7%
Pittwater	\$26.00	\$49.00	\$51.00	\$51.00	\$53.00	104%	6.1%
Two Zone	\$13.00	\$29.00	\$30.00	\$30.00	\$31.00	138%	8.1%
Red	\$14.60	\$32.00	\$32.00	\$33.00	\$33.00	126%	7.4%
Green	\$19.00	\$40.00	\$40.00	\$41.00	\$41.00	116%	6.1%
Yellow	\$22.60	\$44.00	\$44.00	\$45.00	\$45.00	99%	5.8%
Pink	\$25.50	\$47.00	\$47.00	\$48.00	\$48.00	88%	5.2%
Purple	\$33.40	\$54.00	\$54.00	\$55.00	\$55.00	65%	3.8%

10. TravelPass Discounts

It is difficult to establish a quantitative value for TravelPass discounts. Unlike TravelTen discounts, which can be calculated precisely using simple arithmetic, TravelPass discounts depend on the habits of the user. It is possible that some people make less than optimum use of their TravelPass, and so receive no monetary discount at all, but reap the benefit of their investment in the convenience of the ticket.

This matter has been extensively covered in APT submissions to previous IPART enquiries, and our views have not changed.

In fact, one wonders why it is necessary for the Ministry to calculate a discount at all, or to consider that the price of a TravelPass might need to be related to a basket of individual fares. In a modern fares and ticketing system, there are no individual distance-based fares against which the price of a multi-mode pass can be compared.

A time-based or zone ticket is not a framework like a supermarket “shop-athon” where customers greedily load their trolleys with as many goods as they can in a specified time. You can’t buy excess rides today and use them tomorrow. Apart from a few aficionados, nobody deliberately tries to take the maximum number of rides in the time period. The price of a TravelPass or similar ticket should be based on its worth to the customer. The only people who care about an equivalent number of single trips are parsimonious Treasury bean counters.

11. Future of S.T.A. TravelPasses

In August 2005, on page 19 of its submission to last year’s IPART review, the Ministry said, “... the maintenance of TravelPasses on State Transit bus services only may be inconsistent with the principles of competitive neutrality. However, the Ministry is currently exploring means of resolving this issue.”

We would be interested to know if this exploring has reached a result, and resolved a way for private bus passengers to enjoy the benefits of TravelPasses.

12. Employer Loans for Season Tickets

The price of yearly TravelPass tickets ranges between \$1,200 and \$2,200. The cost of yearly rail-only tickets is also expensive. A ticket from Wynyard to Cronulla costs \$1,561, to Macarthur \$1,684, to Gosford \$1,972 and to Springwood \$2,095.

Many people cannot afford these outlays in one hit, and so use weeklies. Many years ago, CityRail provided staff for a small section that assisted large organisations in buying yearly tickets on behalf of their employees. The cost of the tickets was then repaid to the employer by salary deductions. While some employers still do this for their staff, we understand that the CityRail section that promoted the facility has long since closed. We recommend that a similar facility be re-established somewhere within the transport bureaucracy.

13. DayTripper Ticket

The DayTripper ticket, covering rail, bus and ferry travel, is not mentioned in the Ministry’s submission. Its price was not increased in the bus and ferry fares changes in January 2006, but the price was increased from \$15.00 to \$15.40 in July 2006 with other rail fare changes. There is no proposal to increase the price of the ticket from January 2007.

APT recently joined with other groups to promote a \$10 DayTripper ticket. This was based on the premise that while the current \$15.40 ticket is good value for people who include a ferry trip in their day out, it is too expensive for someone wishing to do a day’s travel for business or social reasons. And in the current climate of high petrol and housing prices, it seems that \$15.40 may still be too expensive for an infrequent leisure trip.

In any case, the current price of \$15.40 is silly from a marketing point of view. Of what benefit is the extra forty cents? The round \$15 price would be much easier to market. Even the Ministry, in its submission last year, conceded that “it may be more appropriate for the DayTripper to continue to be sold in a round dollar amount”, but they wanted \$16, not \$15. The sheer simplicity of a \$10 fare would be an important psychological selling point.

The transport authorities can lower the fares any time they like. The IPART determination refers only to maximum fares.

14. A \$10 DayTripper Ticket

We realise that a \$10 ticket would not even cover the \$12.40 cost of a return ferry trip to Manly, let alone the additional cost of travelling between home and Circular Quay. However, the lower price would improve sales, not just for the leisure market, but for people wishing to do a day's business or shopping around the city and suburbs, and who do not wish or need to use a ferry.

Such a ticket would not affect the commuter market. These people tend to buy multi-ride tickets. These, in most cases, are cheaper than five times \$10, and are more convenient. Some multi-ride tickets can also be used seven days a week or on other forms of transport.

Examples of some return trips (at current prices) to compare with a \$10 DayTripper are:

Ferry – Manly to Circular Quay – cash fare \$12.40 – FerryTen \$8.32 – one-fifth of a Green TravelPass \$8.20

Ferry – Parramatta to Circular Quay – cash fare \$15.00 – FerryTen \$10.52 – one-fifth of a Green TravelPass \$8.20

Bus – Newport to City – cash fare \$10.80 – TravelTen \$8.82 – one-fifth of a Pittwater TravelPass \$10.20

Bus – Macquarie University to City – cash fare \$8.90 – TravelTen \$7.22 – one-fifth of a Green TravelPass \$8.20

Train – Penrith to City – cash fare \$13.60 – Off-peak Return \$9.60 – one-fifth of a weekly rail ticket \$9.00 – one-fifth of a Purple TravelPass \$11.00.

The concept deserves further serious consideration, and should not be dismissed merely on the basis of perceived financial loss to any one operating authority.

15. BusTripper Ticket

The Ministry proposes to increase the price from \$11.30 to \$11.70, a 3.5% increase.

The BusTripper ticket continues to be the invisible partner in State Transit's range of tickets.

Ticket Type	Mentioned on			
	Region Guides	Bus Timetables	Northern Beaches "prepay" Leaflet	Price List Brochure
TravelTen	Yes	Yes	Yes	Yes
TravelPass	Yes	Yes	Yes	Yes
DayTripper	Yes	Yes	Yes	Yes
BusTripper	No	No	No	Yes

The ticket cannot be bought from bus drivers, and is sold by only a few agents. It would appear to be a useful ticket for people in areas where there are no trains – South-Eastern suburbs, Manly-Warringah, North Ryde, etc.

State Transit's usual response that hardly anyone buys the ticket is somewhat ingenuous.

16. T-Way Tickets (Liverpool – Parramatta Transitway)

(a) Single Fares

These are the same price as STA and other private bus tickets. Our earlier comments about petrol prices, social responsibility and the master fare scale also apply.

(b) “T-way 10” tickets

T-way TravelTens provide a 15% discount off single cash fares, and this is the maximum discount allowable, according to the contract.

Retention of the 20% discount on other STA buses would be inequitable. The Ministry’s answer to this is to change all the discounts to 15%. Our solution is equally simple – change the 15% discount on the T-way tickets to 20%. This may have to wait until the end of the contract period, probably five years after the T-way opened in February 2003.

However, the government seems willing to break the road tunnel contracts to give motorists a better deal, so why not break the bus contracts to help the passengers.

It is difficult to establish whether a Master Fare scale applies to these tickets. No such scale is mentioned in the previous determination, although the fares were said to increase by a percentage rather than by a fixed amount (thereby implying a Master Scale). The Tribunal should consider whether or not a Master Scale applies here and, if so, whether the proposed increase has been correctly calculated.

(c) “T-way Bus Plus” Weekly Tickets

Similar concerns about Master Fare scales for these tickets should also be investigated.

17. TravelTens on Private Buses

The IPART 2006 determination (Section 5.2) suggested that the concept of TravelTens on private buses should be deferred until Tcard is launched. The start of Tcard is still as close as the end of the rainbow. Years could pass before users of private buses receive the benefits of discounted tickets. This would be grossly inequitable to outer suburban residents.

The introduction of TravelTens for private buses was recommended in the Interim Unsworth Report as far back as November 2003. It is not something that was just dreamed up yesterday.

Recommendation 26: Under new contractual arrangements, require operators to offer a frequency of use discount, possibly in the form of a TravelTen or equivalent "travel bonus" scheme.

The delay is unacceptable. Some method must be found and quickly implemented to enable frequent users of bus in the outer suburbs to receive a discount.

In the final Unsworth Report (Feb 2004) Recommendation 31 said:

Private operators should be obliged to offer a TravelTen (or equivalent) product, discounted at 10-15% relative to single fares. Over time, the discount on State Transit's TravelTen (or equivalent) should be brought to a similar level.

While we agree with the obligation to provide a standard discount, we disagree with the level proposed. Any existing discounts should be increased from 15% to 20% as soon as contracts allow, and all new contracts should provide a discount of 20% (at least).

The contracts seem to have been written for the benefit of the Ministry and the bus operators, with the passengers a distant third place. It is not acceptable for the Ministry to cry, "The contract won't allow it!" whenever we seek a change. We know that the contract won't allow it. Rewrite or break the contract. The government has breached the clauses in the road tunnel contract to pacify motorists.

It is interesting to note that the NRMA is calling for "a fairer road system by proposing a heavy-user discount and saying that it would be willing to chair negotiations between the roads minister and toll-road operators" (SMH 7/9/06).

18. TravelPasses on Private Buses

In its submission to IPART last year (page 18), the Ministry said, "...*TravelPasses may only be used in zones based on radial distances from the CBD and this is not appropriate for the contract areas of private operators. It is also inconsistent with the planning principle of developing a bus network base on linking all regional centres.*" Well, this, of course, depends on how you design a TravelPass.

A change in contract areas calls for a re-think of TravelPasses. It is not good enough to say that because they were designed for a radial system they can't be used for a regional system. And anyway, are not Parramatta, Blacktown, Hurstville, etc now designated as CBDs?

19. DayTripper Tickets on Private Buses

The benefits of the DayTripper ticket should be extended to the private bus areas, along with the TravelTen tickets and the TravelPass tickets.

We recommend that IPART require the Ministry to remove all geographic inequities immediately. We understand that there are no contractual barriers to a Sydney-wide DayTripper, but if it is necessary to amend contracts, then so be it.

20. Cash Fares and Prepaid Fares

Recent private reports and media comments have blamed the large number of buses in the CBD for creating their own congestion in the CBD and along feeder roads. While this may be partly true, much of the congestion is caused by the fare payment method, where a significant proportion of passengers pays cash to the driver (after asking lots of questions and fumbling in their pockets for change). This delays the bus at the stop and obstructs other buses.

APT has long complained about apparent inaction by State Transit to reduce the level of cash fares. The Minister recently said (SMH 11/9/06) that the average boarding time for a cash ticket sale is 11 seconds - a gross underestimation in our opinion.

We were very pleased, therefore, to learn of the cashless bus due to start on the city to Bondi Beach route on 8th October. Full details are available elsewhere, but some points are:

- special route number
- special buses in special livery
- special bus stops
- high frequency
- long hours of operation
- wider range of ticket types available at agents

- larger number of agents selling the tickets
- extremely wide publicity
- staff on the ground to assist passengers
- co-operation of local councils

APT takes this opportunity to congratulate State Transit, and all other organisations and businesses involved, for this bold initiative. We wish it success, and hope that it is contagious.

21. E-Tag Subsidies for Motorists

The Roads and Traffic Authority (RTA) is reported to be planning to offer a \$30 credit to all motorists without an E-tag for the toll-ways if they sign up for a new E-tag. (DT 1/9/06). Where is the subsidy (government or employer) for season TravelPasses?

22. LPG Conversion Subsidy for Motorists

While this is a federal matter, and beyond the control of the Tribunal and the State Government, we wish to place on record our astonishment that the government is subsidising people to continue driving their cars rather than trying to coax them onto transit.

23. Key Performance Indicators (KPIs)

Tables 9, 10 and 11 in the Ministry's submission show the seven Key Performance Indicators that must be reported under the new contract provisions.

- (i) Revenue per Kilometre
- (ii) Passengers per Kilometre
- (iii) Revenue per Passenger
- (iv) Revenue per Trip
- (v) On Time Running
- (vi) Percentage Trips Cancelled or Missed
- (vii) Complaints per 100,000 Passengers

We are concerned that

- (a) some of these indicators may concentrate too much on the individual operators' performances and avoid measuring the overall transport task: and
- (b) other KPIs used by State Transit management are not being considered by the Tribunal.

For instance, KPI (ii) above (passengers carried per kilometre) encourages buses from the outer suburbs to travel all the way to the CBD with a full load. It would be more efficient in the total transport sense to take the passengers to an interchange at a railway station.

There is no KPI for the number of cash fares as a proportion of the total number of fares collected – surely a measure of efficiency. The Ministry's submission gives no indications of current percentage of cash fares, or the trend (is the percentage rising or falling), or the target level (for STA buses). Previous submissions gave some or all of this information. We acknowledge the current "prepay for a faster ride" campaign, and especially the new cashless bus on the Bondi Rd/Oxford Street corridor. However, there still needs to be a KPI to measure the effectiveness of this campaign, and to indicate if any further action is necessary.

In last year's submission, State Transit's KPIs were shown as:

- on-time running
- service reliability
- mechanical reliability (bus changeovers)
- traffic reliability (accidents)

- safety incidents
- security incidents
- average age of buses
- total kilometres
- complaints per number of trips
- percentage of wheelchair accessible buses

While some of these may be wrapped up in items (i) to (vii) above, not all of them are.

We presume that State Transit also has other KPIs, measuring such things as:

- staff turnover (or retention)
- personnel productivity
- revenue per vehicle (asset productivity)
- vehicle on-road hours
- vehicle kilometres per week

APT suggests that IPART should promote discussion on KPIs, and how they might be used.

24. University Students

(a) International Students

International students in NSW are not eligible for public transport concession unless they are receiving an Australian Government or public university scholarship. We understand that Victoria is the only other state not to allow concessions to university students from overseas. This incongruity should be corrected.

(b) Season TravelPasses

Local students are not allowed to buy concession quarterly or yearly TravelPasses – only weeklies. This is apparently to prevent students from enrolling, getting a concession card, buying a yearly concession ticket and then dropping out of university but keeping the concession ticket. This is disadvantaging the large majority of diligent students to protect against a few dishonest or absent-minded ones. It should be possible for the universities and the transport authorities to share information to allow a ticket to be cancelled when a student drops out. Perhaps a special Term TravelPass could be introduced for university students.

25. Newcastle Tickets

We do not have a detailed knowledge of the Newcastle system. Locally based groups and individuals will be able to offer more useful comments.

However, we object to the proposal to change the existing time-based fares on STA Newcastle buses to conform to the distance-based fares in Sydney. It should be the other way around. Sydney's nineteenth century distance based fares should be replaced by time and zone based fares, as in every successful public transport system in Australia.

26. Tcard

As stated many times before, APT has no objections to a properly planned and operating smart card. However, at a time when live trials of the Tcard are about to start on the Newtown buses, it is disappointing to note that there has still been no true consultation by the authorities with the ultimate users, the passengers. All that we have had are “questions and answer” sessions – questions by us and answers by them.

However, it appears that these “question and answer” sessions may not have been entirely one-way communication. The Tcard is now being spoken of as an integrated fare system, and not just an integrated ticket system. Its scope also seems to have expanded from just “single tickets and TravelTens” to “every type of existing ticket”.

Although the Tribunal is not being asked to determine Tcard fares at this time, we wish to make it clear that we expect the Tcard to provide users with at least the same financial and convenience benefits as exist under the current ticketing regime.

We also mention again, as we have done in previous years, that the “imminent arrival” of Tcard must not be used as an excuse to defer ticketing reforms. The Tcard has been coming “real soon now” for several years. Changes to the current system, such as providing TravelTens for private buses, cannot wait any longer. The passengers want equity. The Ministry says it wants equity.

27. The Bus & Coach Association (BCA) Submission

The following items in the BCA submission support various APT recommendations above, and we endorse the BCA’s position.

- the BCA has called on the Government to set a target such as “grow” the percentage of trips taken by bus (in the Sydney Statistical Division) from 6% on an average weekday to 10% by 2015. (page 6)
- BCA and others have made submissions on congestion costs and the benefits of a whole of government approach to the public transport budget (page 6)
- Passengers on Private Bus Services are still not receiving the Multiride discounts offered to passengers on Government bus services. (page 6)

28. Our Nineteenth Century Fares System

The Ministry’s concept of a ticketing system is rooted in a nineteenth century tradition of distance based fares. That might have suited nineteenth century travel patterns. Today’s transit passengers want to go everywhere, and with the same freedom as in their own car. In 1979, a new flower of hope appeared in the ticket garden – the TravelPass (although the name TravelPass was not use until 1983). The ticket quickly became very popular, not just because of its price, but for its convenience. However, the weeds in the garden still threaten to stifle and destroy it, while the gardeners refuse to propagate it.

29. Towards A Seamless Public Transport System

Many of our recommendations above are steps along the way towards a seamless public transport system. Intending passengers should not need to know the name of the bus company (Veolia!!) nor have a range of different operators’ tickets in their purse.

IPART's final determination should rise above the level of contracts and accounting. The decisions the Tribunal makes should, as a bare minimum, not erect barriers to reform of fares and ticketing. With a wider vision, the Tribunal's findings must clear a path through the wilderness for a unified public transport system, making the crooked straight, the rough places plain, and sweeping away all inequity.

The colour of the bus must be a matter of aesthetics only, not the banner displayed by the jealous guardian of a contract area.

30. Conclusion

We have no objection to this document being made public. If you have any queries, please call me on 9516 1906 or email to allanmiles@hotmail.com .

Yours faithfully,

Allan Miles
Secretary
Action for Public Transport (NSW)