

[Ticketing Block Exemption Review](#)
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[18 September 2015](#)

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Trainline's response to the CMA Public Transport Ticketing Schemes Block Exemption Review

This letter sets out Trainline's response to the consultation on renewal of the block exemption.

By way of background, Trainline is a 'third party retailer' operating under an ATOC Third Party Investor Licence to retail rail tickets. Our systems sell over £1.6bn worth of rail tickets each year and we have some 4.5m active customers across our branded web, app and call centre channels. We sell to all types of passenger, from regular commuters taking short journeys to occasional long-distance travellers, and everything in-between. We sell widely to both the leisure and business markets. We are not limited by franchise/investment horizons. At all times, our focus is on the customer/passenger and best serving their particular, and various, needs backed by a deep understanding of their requirements.

We agree with the CMA's findings that passengers place value in integrated, interoperable transport networks and note that this accords with the ORR's findings as part of its recent Review of the Rail Retailing Market. To support such integrated networks we believe a degree of co-operation amongst TOCs is inevitable and is supported by the clarity provided by the current block exemption.

In short, we would be concerned that if the current public transport ticketing schemes block exemption were not renewed, this would lead to further confusion to a rail ticketing system already regarded by many as overly complex (research by the Office of Rail Regulation discovered that 43% of respondents say the rail fare system is too complex). We therefore agree with the CMA's proposal that the current block exemption be renewed until February 2026.

However, we would add that in order to achieve the objective of avoiding unnecessary passenger confusion in the rail ticket market, we believe is essential that all products and fares are made available by Train Operating Companies to all retailers. Passengers should have confidence that they will be sold the same fare (i.e. the best fare) for their journey regardless of where they choose to purchase it. We believe that the use of fares restricted

to a TOC's own retailing channels is unhelpful for passengers, damaging to other retailers and holds the industry back in gaining share versus other modes of transport.

We also note that the CMA is able to review the extension at any time to the extent that the underlying basis for the decision changes, including changes in technology, which we support.

We would finally add that we fully support the work being done by the ORR in its Review of the Rail Retailing Market to improve the conditions of the rail retailing market for the benefit of all stakeholders in the rail industry; most importantly, passengers. We would suggest that the ORR Review would be a more effective and focussed method of improving market conditions than a removal of the block exemption, at least insofar as it relates to the rail market. We are separately responding fully to the ORR consultation process.

Trainline.com Limited - 18 September 2015