

Greater Manchester Travelcards Limited



Competition and Markets Authority

**The public transport ticketing schemes block
exemption**

**Consultation document on draft guidance and short
guide.**

Response from Greater Manchester Travelcards

May 2016

May 2016

Introduction

Greater Manchester Travelcards Limited (GMTL - System One Travel)

Greater Manchester Travelcards Limited (GMTL is a company co-owned by Greater Manchester's private bus, rail and tram operators and Transport for Greater Manchester (TfGM). "System One Travelcards" is the brand (and product range) promoted by GMTL.

System One Travel (GMTL) was launched in 1994 (under the Clippercard brand) in response to local customer demand for multi-operator, multi-mode transport ticketing options. The "System One Travelcards" product range is one of the largest integrated multi-operator ticketing scheme in the UK.

In September 2006 the scheme was re-branded "**System One Travelcards**", recognising a need to present a more instantly recognisable name and to build greater awareness of its travelcard range amongst the local population and visitors to the region.

In February 2006, local PayPoint shops across Greater Manchester started selling the 7 and 28 day Bus Savers for adults, young persons and children. There are more than 800 PayPoint shops across Greater Manchester, making it more convenient than ever to buy bus travel.

In 2011, the website was redesigned and functionality upgraded to sell E-Bus Savers, thus offering customers additional purchasing flexibility.

Currently in partnership with the public transport operators and TfGM a Smartcard ticketing scheme is being added to the market offer branded under the My Get Me There concept.

Executive summary

GMTL believes the draft guidance and short guide are helpful and a useful addition to the scheme.

GMTL's Detailed Response

We have set out below the specific questions asked by the CMA in their consultation document. We have then set out GMTL's response below the questions.

CMA scope of the consultation

The CMA consultation seeks the views of the interested parties on the draft guidance and short guide on the block exemption. The draft guidance also provides wider context on the legal basis for, and objectives of, public transport ticketing schemes and on how to assess whether a public transport ticketing scheme falls within the scope of block exemption. It sets out the specific questions on which the CMA is seeking respondents' views.

Questions for consultation:

Part 2 Overview of the legal framework

1. (2.16) This section has been shortened and simplified to make the guidance more user-friendly:
 - a) Do you consider that this section (read in conjunction with the rest of the guidance, in particular Appendix B) is providing you with appropriate level of detail?
Yes
 - b) What changes, if any, do you suggest?
None

Part 3 The scope of the block exemption

2. (3.30) This section has been expanded to set out what is meant by "substantially the same". We use examples and route maps to illustrate the points:
 - a) Do you think that it is clear what is meant by "substantially the same"?
Yes
 - b) Do you find the examples and route maps helpful?
Yes
 - c) Is the information required to make an assessment easily available?
Yes
 - d) Do you have any suggestions to make this section clearer?
No
 - e) Do you have any further comments on this section?
No

3. (3.36) This section reflects changes to the definition of MTC in the block exemption. We explain what is meant by “in practice, not substantially used as an MIT or TT”. We use examples and route maps to illustrate points:

a) Do you think that it is clear what is meant by “in practice, not substantially used as an MIT or TT”?

Yes

b) Do you find the examples and route maps helpful?

Yes

c) Is the information required to make an assessment easily available? If not, please explain what the obstacles are and what alternatives might be used instead?

Yes

d) Do you have any suggestions to make this section clearer?

No

e) Do you have any further comments on this section?

No

Part 4 Legal conditions and obligations for schemes covered by the block exemption.

A Conditions that apply to all public transport ticketing schemes

4. (4.5) This section has not been changed substantially:

a) Do you consider that the examples are relevant?

Yes

b) Would any of the examples cause you concern?

No

c) Would you like to add further examples?

No

5. (4.5) In this section we have introduced some examples:

a) Do you consider that the examples are relevant?

Yes

b) Would any of the examples cause you concern?

No

c) Would you like to add further examples?

No

6. (4.11) In this section we have introduced some examples:

a) Do you consider that the examples are relevant?

Yes

b) Would any of the examples cause you concern?

No

c) Would you like to add further examples?

No

7. (4.22) In this section we have added more explanation and introduced some examples of information which can and cannot be exchanged:

a) Does this draft help you to understand what information you can and cannot exchange?

Yes

b) Do you consider that the examples are relevant?

Yes

Are there any omissions or points which would cause difficulty in operating the schemes effectively? (Please give details of the nature of information exchanged and why it is necessary for the effective operation of the scheme).

No (n/a)

c) Would you like to add further examples?

No

d) Do you have any further comments on this section?

No

B Conditions that apply to through ticket schemes

8. (4.29) This section is largely unchanged:

a) Do you consider that the example is still relevant? (If not please explain why and provide an alternative example).

Yes

b) Would you like to add further comment on this section?

No

C Conditions that apply to multi-operator ticket schemes

9. (4.36) We have changed this section slightly to make it clearer:

a) Do you have any comments on this section?

No

D Conditions that apply to multi-operator travel card schemes

10. (4.47) In this section we have provided more clarification on agreeing the price of MTCs and we have added a revenue share example:

a) Do you consider that the guidance on agreeing prices is helpful?

Yes

b) Would any examples cause you concern?

No

c) Would you like to add further examples?

No

Part 5 Agreements falling outside the block exemption.

11. (5.10) In this section we have introduced an example of a section 9 (1) self-assessment to give an indication to operators that wish to develop MIT-type schemes which fall outside the block exemption of the kinds of factors which could be relevant:

a) Do you consider that the example here is helpful? (Or do you think that there are still areas which need more guidance)?

Yes

b) Do you have any further comments on this section?

No

Questions on short guide

The purpose of this guide is to give a quick overview of the block exemption.

- 1 Do you think the short guide is sufficiently clear and easy to understand? (If not please suggest what needs to be changed).

Yes

- 2 Do you consider that this short guide is providing you with an appropriate level of detail?

Yes

Responder

Trevor Roberts FCILT
Chairman (Independent)

Greater Manchester Travelcards Limited
101A Lapwing Lane
Didsbury
Manchester
M20 6UR