

Public Transport Ticketing Schemes Block Exemption Order Review



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To: pttsbereview <pttsbereview@cma.gov.uk>

To whom it may concern,

The City of Oxford Motor Services Limited (trading as the Oxford Bus Company), Thames Travel (Wallingford) Limited, Carousel Buses Limited and Pulham & Sons (Coaches) Limited would like to give their strong support for the consultation of the current Public Transport Ticketing Schemes Block Exemption Order ("The Block Exemption"), which we understand you are currently in the process of reviewing.

The companies above make use of the arrangements in The Block Exemption to allow them to participate in the following multi-operator public transport ticketing schemes:

Oxford SmartZone
Wycombe SmartZone
Reading All-Bus
Swindon TravelPass

These are each successful schemes, which have significant uptake from the travelling public and which facilitate integration of transport networks and interchange between bus services for customers. For example, the Oxford SmartZone scheme recorded 582,377 journeys during a 5 week period in March 2024, an average of 116,475 journeys every week.

Over recent years, we have continued to invest in, and develop these schemes. For example, in 2022 we introduced QR code ticketing on Oxford SmartZone for the first time. During 2023 we introduced multi-operator tap-on, tap-off capping to the Reading All-Bus scheme.

Moreover, the government's National Bus Strategy for England "Bus Back Better," published on 15 March 2021 states:

"Passengers should not have to buy a new ticket when changing buses. Easy through ticketing should be available between bus operators and other transport modes."

And also:

"Our ambition is for an integrated ticketing approach to allow you to buy a through journey for local bus, rail and metro with a single tap on your smartphone."

In following this guidance, as bus operators we are working closely with our local authorities to roll out further multi-operator ticketing schemes which make use of the provisions set out in The Block Exemption. For example, in Oxfordshire we expect to introduce in summer 2024 new, county-wide "all operator" day and monthly ticket products as a key part of our local Bus Service Improvement Plan (BSIP). We are also at the early stages of planning new multi-operator ticketing in Gloucestershire, under that local authority's BSIP; and further expansion of the offering already available in Buckinghamshire, under that local authority's BSIP.

Removal of the Block Exemption would most likely lead to the cessation of existing, successful schemes such as those noted above, as the risk to operators in continuing these would be too great; and would also make it far harder, and more costly to make progress on the further schemes that are currently aspired to by several local authorities and on which we are already working.

Please let me know if you would like to discuss any of the points I have made above in relation to your review of The Block Exemption provisions and guidance.

Best regards,



Managing Director

Oxford Bus Company | Thames Travel | Carousel Buses | Pulhams Coaches | City Sightseeing Oxford



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