

Public Transport Ticketing Schemes Block Exemptions: Call for Inputs - Peninsula Transport Sub-National Transport Body



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

Cc:✂

OFFICIAL

Dear Competition and Markets Authority,

Peninsula Transport Sub-National Transport Body (STB) is responding to this Call for Inputs due to the significance of the exemption at the strategic transport planning level across the south west peninsula. We represent five Local Transport Authorities (LTAs): Cornwall, Plymouth, Devon, Torbay and Somerset.

Peninsula Transport STB agrees that the Block Exemption should be extended.

Peninsula Transport STB is working with LTA members and transport stakeholders to develop a regional action plan for integrated ticketing. The plan will set out the path to integrating ticketing across the peninsula and what needs to be done to achieve this. It is our understanding that without the 'Block Exemption' multi-operator tickets could be illegal as they would represent a form of price-fixing between operators.

We are also engaging with Midlands Connect Sub-National Body and Transport for the West Midlands as part of Project Coral. All five of our Member Authorities have provided letters of support to the project.

In the longer term, we want to put the peninsula forward as a national demonstrator for a non-Passenger Transport Executive (PTE) area to the Department for Transport and lead on the delivery of a multi-token Account Based Ticketing Platform.

To achieve our strategic objective of a single multi-operator, multi-modal, multi-token aggregating Account Based Ticketing Platform, we would strongly support the continuation of the Public Transport Ticketing Schemes Block Exemption as there are clearly benefits to consumers in terms of choice, affordability and convenience. Due to the importance of cross-boundary services, the STB is ideally placed to facilitate a regional approach to integrated ticketing, rather than continue with the limitations of only focusing within LTAs boundaries and on individual BSIPs. Whilst the development of Enhanced Partnerships is welcomed across the region, and goes some way to improving the passenger experience, the ability to travel 'cross-border' through the peninsula area using a multi-operator, multi-token approach would still be restricted based on the extent of these partnerships. The Block Exemption facilitates a truly seamless travel experience to be achieved, subject to the appropriate technology being in place.

In a rural area like the far south west, it is even more important for passengers to be able to purchase tickets that can be used on the services of more than one of the participating operators and there are risks that such products would not consistently be offered without the exemption. There is a significant risk at the operational level that we will be unable to achieve our longer term ambition of interoperable ticketing between modes, with the associated benefits of carbon reduction, increased resilience, economic growth and reduced congestion during seasonal peaks if the exemption were to lapse. It is our understanding that there have not been any harmful effects on competition caused by the block exemption with many LTAs offering successful and popular local ticketing schemes, most notably in the peninsula by Transport for Cornwall.

Please note, we are also aligned with the CPT response.

Kind regards



Peninsula Transport Project Manager



01752 305506

www.peninsulatrtransport.org.uk

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