

**From:** [REDACTED] <[REDACTED]@firstbus.co.uk>  
**Sent:** 01 September 2025 09:47  
**To:** pttsbereview  
**Subject:** Consultation response - Draft Guidance

Please find below responses from First Bus; please address any questions to the undersigned.

#### Question 1

Paragraph 3.5 has been amended to clarify that non-physical indications of an entitlement to travel and, where they apply to relevant modes of transport, tickets purchased via MaaS platforms fall within the current definition of a ticket in the block exemption.

- Do you think that the wording adopted is sufficiently clear? **Yes, we do.**
- What changes, if any, do you suggest? **Nil**

#### Question 2

Paragraphs 3.38 and 3.39 have been amended to reflect the fact that the block exemption no longer has a fixed duration and will be reviewed every five years.

- Do you think the wording adopted is providing you with appropriate level of detail? **Yes, we do.**
- What changes, if any, do you suggest? **Nil**

#### Question 3

At paragraphs 4.44 and 4.45, new wording has been added to explain that the definition of 'connecting service' no longer excludes bus services from its scope.

- Do you think the wording adopted is providing you with an appropriate level of detail? **Yes, we do.**
- What changes, if any, do you suggest? **Nil**

#### Question 4

Paragraphs 4.55 to 4.57 contain a new subsection on TPRs to explain the value that they can provide consumers and the benefits of allowing TPRs to retail tickets for ticketing schemes.

- Do you consider that the section on the TPRs is helpful? **Yes, we do.**
- What changes, if any, do you suggest? **It would be of greater benefit if it was made clear that third party retailers are required to sell tickets at the prices determined by the participating transport operators who are parties to those ticketing schemes, unless agreed by those schemes on the basis of decisions taken by their participating operators.**

#### Question 5

What aspects of the draft guidance, if any, do you consider need further clarification or explanation? In responding, please specify which part of the draft guidance your comment relates to. **Nil.**



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