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## Minutes

Agenda item : 4  
Drafted : 22.9.10

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**Minutes of a meeting of the Fares and Ticketing Committee  
held on 21 September 2010 at 6 Middle Street, London EC1**

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### Present

#### Members

David Barry; Kevin Davis, Daniel Francis, Onjali Rauf, David Leibling (Chair) and Sharon Grant (London TravelWatch, Chair)

#### Guests

Wilco Chapels	London Pricing Manager, ATOC
Sultana Idris	Senior Research and Project Adviser, Passenger Focus (item 9)
Lucy Preston	Ticketing Policy Manager, Transport for London (TfL)
Peter Twigg	Head of London & South East Support, ATOC
Ian Wright	Head of Research, Passenger Focus (item 9)

#### Stakeholder Representatives

Matt Winfield	Stakeholder Engagement Manager, TfL
Bob Turner	Principal Transport Planner, London Borough of Newham
Liz Pooley	Transport Planner, London Borough of Bexley

Secretariat	
Tim Bellenger	Director, Research and Development
Janet Cooke	Chief Executive
Bryan Davey	Director, Public Liaison
Mark Donoghue	Committee Administrator

## **Minutes**

### **1 Chair's introduction and pre-meeting announcements**

The Chair welcomed guests and members to the meeting.

### **2 Apologies for absence**

Apologies were received from Lorna Reith, Michael Dollin and Wilco Chapels for lateness.

### **3 Declarations of interest**

No additional declarations of interest were made. A public record of member's interests may be found on the London TravelWatch website (<http://www.londontravelwatch.org.uk/document/3861/get>).

### **4 Minutes**

The minutes of the meeting held on 17 June 2010 were approved and signed for the record.

### **5 Matters arising (FT 43)**

The Chair noted that the item (17.6.10, minute 5, To confirm what London Underground's policy was on staffed presence at stations) was outstanding. London Underground (LUL) had published plans to reduce ticket office opening hours and for ticket office staff to move on to the gate line at stations. Ms Preston reported that she had spoken to her colleagues at LUL. They are undertaking work to manage the transition where staff will move from the ticket office to the ticket hall at stations. The Director, Research and Development noted that a report on the LUL ticket office proposals would be submitted for the London TravelWatch board meeting on 28 September 2010.

On the gating of national rail stations (18.2.10, minute 8, To look in further detail at the gating of national rail stations) the Director, Research and Development reported that he had been involved in further correspondence on the gating at Kings Cross. He was also aware that a further 10 stations would be gated in the National Express East Anglia franchise area (this would be done prior to the start of the new franchise).

A member noted the success regarding the ticket office opening hours for South West Trains (SWT). The Chair noted his thanks to the secretariat in providing evidence and their achievement.

## **6 Actions taken (FT 44)**

The Chief Executive noted that London TravelWatch would be having a further meeting with the Association of Train Operating Companies (ATOC) on the first class travel report.

The Director, Research and Development reported that the report had been raised with Train Operating Companies (TOCs). They had responded positively to it.

## **7 Oyster Pay As You Go (PAYG) update**

The Director, Research and Development reported that Transport for London (TfL) and TOCs were currently reviewing Oyster Extension Permits (OEPs). OEPs are purchased by passengers when they travel beyond the boundary of their Oyster card. London TravelWatch awaited the outcome of the review. He had met the Managing Director and Commercial Director of SWT regarding the retail of Oyster products. He had a much more positive meeting than anticipated and he hoped that a deal between SWT and TfL could be speedily resolved.

The Director, Public Liaison had raised concerns with the DfT that SWT were issuing penalty fares to passengers who did not have OEPs despite the fact that it was not possible to get them at their stations. He reported that he had met with TfL Fares and Ticketing team to raise issues and concerns from London TravelWatch's casework (A brief note of this meeting is in the appendix to this document). The team is dealing with an increasing number of issues and recognises that some issues need more time to resolve. One example is a person who had a zone 3 to 6 travel card on their Oyster card who travels into central London via Stratford occasionally, would have paid the TfL extension fare prior to the roll out of Oyster PAYG on national rail. However, as Oyster extension fares are calculated from where you start the journey, passengers pay a higher through tube/train fare.

On capping he now understood the rules governing this better and believed that it benefited the customer. In particular, capping at the lowest relevant fare first. Shoreditch High Street station had been put in zone one, which had meant higher fares for short journeys. When economic conditions were more benign the higher fares had been mitigated, but with the current economic climate this was now more difficult.

On maximum journey times there had not been many complaints. However, there were some occasions when problems occurred, but TfL were considering operations to resolve these when they occurred. He also explained that for some journeys, Oyster PAYG makes assumptions as to what route you will take, with the result that some passengers were charged for going through zones, even though they did not. For example, travelling from Hackney Wick to Camden Road and changing for, Camden Town to Edgware would be charged a zone 1 to 5 fare, rather than a zone 2 to 5 fare. He was also concerned that national rail stations with no pink validators meant that passengers were unable to specify their route so were often charged for travelling through zone one. He also noted that some operators such as FGW passengers

did not need to use OEPs before the roll-out of Oyster PAYG on national rail, but now need to purchase them. This change had been imposed upon them.

The Director, Research and Development felt that a number of journeys carried out in London were orbital. Passengers assume that if they do not go through zone one, they will not be charged for travelling through zone one.

Members discussed the ways in which the fares charged to passengers were calculated. The Chair felt that the journey planner should also include a fare planner for passengers. Ms Preston noted that the journey planner on the TfL website gave passengers the quickest route, not necessarily the cheapest route.

A member felt that passengers in London had a clear picture of the zonal system. However, the fares system in operation was calculated in a different way. There needed to be a clear distinction communicated to passengers of the distinction between the cheapest fare and the fastest journey.

Mr Twigg reported that his report on the initial review of OEPs would go to the senior liaison group at ATOC. TOCs recognise the issues in communicating OEPs to passengers. The use of OEPs is not comprehensive and they were the best solution to revenue protection problems. The report would indicate the future direction for OEPs.

A member asked what communication methods TOCs had used to communicate OEPs. Mr Twigg replied that leaflets were given to passengers when the national rail Oyster PAYG rolled out.

Mr Twigg reported that the growth was starting to flatten for Oyster PAYG on national rail. It was too early to say whether national rail passenger numbers had increased as a consequence of the roll out. The Chair noted the team work between TfL and ATOC and that London TravelWatch were keen to promote joined-up travel. He hoped the anomalies would be removed.

## **8 South West Trains schedule 17 application**

The Director, Research and Development reported that he had received a letter from the DfT on 13 September 2010 explaining the decision of the Secretary of State regarding South West Trains' schedule 17 application. Most of the plans to reduce the opening hours of ticket offices in London TravelWatch's remit were withdrawn. Most of the stations were over 12 transactions per hour rule. Some proposals were accepted, for example, Berrylands will be closed on Saturdays. The proposals for Strawberry Hill were not all agreed to by the Secretary of State.

## **9 Use of ticket vending machines (FT 46)**

The Chair welcomed Ms Idris and Mr Wright to the meeting. Their presentation may be viewed in full at

[http://www.londontravelwatch.org.uk/documents/get\\_lob?field=file&id=3852](http://www.londontravelwatch.org.uk/documents/get_lob?field=file&id=3852).

Ms Idris explained that the research was conducted early on this year. Passengers lack confidence with ticket vending machines (TVMs). They did not spontaneously decide to use TVMs. The least confident users were quick to give up.

A member felt that the TVMs were designed by the rail industry, but no account had been taken of passengers. Ms Idris noted that the TVMs do not take offers into account when they sell tickets.

The Chair wondered if the screens on TVMs were similar to the system used by ticket office staff. Mr Chapels noted some industry data is on TVM screens. He noted that this data is picked up in TVMs without any explanation to passengers regarding the jargon.

The recommendations from the research are better sequencing (consider more screens with simplified steps and to consider A-Z destination finder as first step, with preset destinations as an option if required); layout (reduce volume of information on screens; use colour contrast; highlight one step/screen back option; extend time-out option; simplify the basket function); information and language (improve labelling and terminology; help button to provide information/assistance; provide a clear confirmation summary; provide staff/floor walkers for help and reassurance); and to give further consideration to the needs of disability groups.

The Chair felt that London stations should be brought up after typing in either London or the name, for example, Euston or Victoria. He asked whether information from the national database can be made easier to understand. Mr Chapels replied that TOCs can manipulate some of the data. Mr Twigg noted that some of the database terminology can be difficult to understand.

The Chair asked if TfL is doing any work on its TVMs. Ms Preston noted that Cubic manufactured their TVMs. Some tweaking had taken place, but no major changes had taken place recently. Adding a travel card or credit to an Oyster card are a growing proportion of ticket machine transactions. It was not apparent to all passengers that you had to touch your card against the Oyster card reader on the TVM to add credit to it.

A member felt that there needed to be consistency across all operators' TVMs. A member asked whether the research on TVMs included tourists or those passengers with limited English language skills. Mr Wright felt that the changes proposed from the research would also be beneficial to tourists who are often the least confident users.

The Director, Public Liaison noted that one way to improve the passenger experience would be to have simpler fares. TfL had a simpler fare structure, which was less problematic.

Mr Twigg noted that the number of TVMs had grown. Each individual TOC did a deal with a supplier. Very often the supplier had ex-railway staff working for them. ATOC are working to simplify TVMs. ATOC recognise TVMs are a problem.

The Chief Executive noted that the Director, Research and Development had been in discussions with TVM manufacturers. She noted that some of the older DLR TVMs were now in use on the Croydon Tramlink. Access to Oyster retail facilities in South East London is an issue. She had raised this issue with Shashi Verma at TfL.

The Chair noted that this was a good example of work where London TravelWatch and Passenger Focus worked together.

## **10 Penalty Fares Review**

The Director, Research and Development reported that he and the Director, Public Liaison attended a meeting at the DfT in April. They had emphasised that the important thing for passengers was to be able to purchase a ticket. In any penalty fares scheme there must be a distinct opportunity for passengers to buy tickets from TVMs or staff. Passengers should also have the ability to buy the ticket they want. There needs to be greater consistency in the penalty fares regimes of national rail and TfL. There also needed to be a standard system of appeal administration and similar procedures, for example, paying fines. He also noted the problem of administration charges being added to a penalty fare, but not being revoked after a successful appeal against the penalty fare.

## **11 London Assembly report on fares policy in London**

The Director, Research and Development noted that the report felt that the RPI + 2 per cent fare increase could not be justified. The projected fare revenue decrease by TfL had not occurred. RPI was almost 5 per cent in July 2010. The report also recommends a balance between the level of fares and investments. The report also suggests bus fares and bus tickets not rising more than the average overall fare increase.

Ms Preston reported that TfL had not responded to the report. January 2011 was not far away. TfL are working through what the fares package will be. The deadlines are tight for creating the fares tables for January 2011.

Mr Twigg explained that the rail industry had noted the Mayor's position. London TravelWatch take the passenger's view and for fares to be affordable as possible. TfL's fares predictions were better than expected. A member noted that London TravelWatch believed fares should be affordable and cover the costs of the transport operators.

## **12 Any other business**

The Director, Research and Development reported that an issue had arisen regarding the validity of tickets to Stratford station. There are two separate stations : Stratford international and Stratford regional. When passengers purchase tickets 'to Stratford', they expect to be able to exit at either station regardless of whether it is the international or regional. In the original planning permission for the Stratford international station a travelator link was required between the international and regional stations due to the distance between them. If a passenger travels between the two stations using the Docklands Light Railway (DLR) service they will incur a fare.

Ms Preston noted that the DLR is not a shuttle service. There had been in depth conversations at TfL regarding this. The DLR would not agree to a free journey or act as a replacement to a travelator.

Mr Turner noted that the developer had asked to be released from the obligation from building a travelator. Newham expected the DLR be free. He also felt that Stratford should be treated as one station for ticketing purposes. He noted the problems that passengers with luggage, those with mobility impairments, etc would experience.

Ms Preston noted that TfL and DLR felt that passengers would need a valid ticket from High Speed One (HS1) to the regional station. It was also noted that Southeastern would take a similar view as the DLR on providing a free service between the two stations.

It was agreed to write to the DfT arguing that the two stations at Stratford should be classified as one station. The Director, Research and Development would draft a letter and the Chair would sign it.

**Action : Director, Research and Development**

### **13 Resolution to move into confidential session**

The Committee resolved, under section 15(6) of schedule 18 of the Greater London Authority Act 1999, that by reason of the confidential nature of the following items, it was desirable in the public interest that the public should be excluded from the meeting.

In private session members discussed the possible fares increases from January 2011 for passengers and the confidential minutes for the meeting held on 17 June 2010. They also reviewed the meeting and discussed future agenda items.

The next meeting would take place on 30 November 2010.

### **14 Glossary**

ATOC	Association of Train Operating Companies
DfT	Department for Transport
DLR	Docklands Light Railway
FCC	First Capital Connect
LUL	London Underground
OEPs	Oyster Extension Permits
PAYG	Oyster Pay As You Go
SWT	South West Trains
TfL	Transport for London
TOCs	Train Operating Companies
TVMs	Ticket Vending Machines

**Notes from Director, Public Liaison's meeting with TfL Fares and Ticketing team  
30 July 2010**

### **Oyster Extension Fares**

We are concerned that Stratford to Liverpool Street has two separate fares despite being an inter-available route. Therefore passengers from stations such as Romford and Goodmayes who used to be able to get paper extension tickets from Stratford into Central London at the TfL fare rate are now being charged the Tube train rate. This appears to be a disbenefit from the change to Oyster. Have TfL got any plans to remove this anomaly? If not, how is TfL intending to make passengers aware of how extension fares are charged?

TfL response :

“Oyster charges extension fares from the likes of Romford when a Travel card excluding Zones 12 is held. For travel to London Underground stations in Zone 1, a National Rail through Zones 1 & 2 fare is charged irrespective of whether you travel by tube or train. As a result the extension fare exceeds the Pay as you go (PAYG) fare from Stratford. The rule is based upon where your journey started not where the extension started from. Similar issues can occur at stations such as Wimbledon or Balham. Some information on this issue has been added to the website <http://www.tfl.gov.uk/tickets/14414.aspx>

TfL do not see a way of resolving this issue currently. The longer term solution will be to harmonise National Rail and Tube fares in London which they are discussing currently.”

### **Capping**

We are having some difficulty understanding the Oyster PAYG capping rules. It would therefore be useful if we could discuss how price capping applies.

The following example is provided by an employee who used PAYG in conjunction with his Zones 1-3 Annual Travel card with Gold card discount who travelled around London to some unusual parts of the area. He was unable to understand how many of the fares and capping rules were arrived at.

Day 1 (Monday)

Touch in Tulse Hill about 0840 interchange at Elephant & Castle on to the Bakerloo line and touch out at Wembley Central (Zone 4) just after 0930 charged £0.85. Bus 92 to Wembley Stadium touch in at 1001 train to Northolt Park touch out 1015 charged £0.85, bus 395 to Greenford, touch in at 1045 then via FGW, District Line and SWT (touch interchange validator Richmond) touch out at Hampton about 1230 charged £1.15, bus 216 to Hampton Court, Touch in there about 1250 and via SWT,FCC and Southern touch out at Epsom Downs at 1425 charged £1.15. Walk to Tattenham Corner touch in at 1515 touch out Norwood Junction charged £0.20p so capped at £4.20.

TfL response :



“The system caps firstly on the off-peak price and then on the peak price. Therefore in this case, the cap was based upon the Zones 3-6 Off Peak cap (£5.10 minus the railcard discount = £3.35) plus 85p for the peak journey.

In this case, the Off-peak fare was charged for the morning peak journey in error due to a data problem which is being fixed in September.”

Day 2 (Tuesday)

Start with £2.30 on card. Touch in Norwood Junction 1000 touch out Caterham 1024 charged £1.15. 1130 Touch in at Caterham and travel via Southern WLL service and Overground to Watford High Street touch out 1344 charged £0.85p. Touch in at Watford met at 1450 touch out Chesham 1535 charged £1.30. Touch in at Chesham 1635 via Met and FCC touch out Herne Hill 1808 charged £0.40p so capped at £3.70.

TfL response :

“The cap was based upon the Zones 3-9 Off Peak cap (£5.60 minus the railcard discount = £3.70).”

Day 3 (Thursday)

Start Tulse Hill touch in 0850 and touch out at West Hampstead Thameslink at 0935. Touch in at West Hampstead LOROL 1002 via Gospel Oak – Barking line (touch interchange validator at Gospel Oak) and C2C to Upminster touch out 1105 charged £2.20. Upminster touch in 1120, Ilford touch out 1151 charged £1.15. EL2 bus to Dagenham Dock then touch in there at 1250 then via c2c to Limehouse, DLR to Shadwell, ELL to New Cross and SER to Petts Wood touching out at 1425 charged £1.30 (used gates/validators at Limehouse and Shadwell), so total cost was £4.65.

TfL response :

“In this case, no cap was applied. Passenger was charged the £2.20 peak fare (Z456 National Rail through fare) plus Off-peak fares of £1.15 and £1.30.”

### **East London line fares**

Short hop fares – e.g. Whitechapel to Hoxton is based on Zones 1 & 2 fare and is £2.30 peak and £1.80 off-peak, whereas if you travel via Stratford it’s a Zone 2 & 3 fare and £1.30. While I understand why Shoreditch High Street is in Zone 1, it seems odd to make short hop journeys on the East London line so expensive. Can this be reviewed?

TfL response :

“When the zonal system was introduced on London Underground, lower fares were created for some short journeys that straddled zones to prevent significant increases in fares. The East London line is a new line and as such as with the Jubilee Line extension, TfL did not introduce lower fares for short hop journeys. In the current financial climate, TfL do not intend to consider this.”

## **Maximum Journey Times (MJTs) – flexibility in their application**

A passenger raised the example of Dalston Junction to Clapham Junction via Crystal Palace. As I understand it, the maximum journey time is based on crossing three zones (Zone 2 – Zone 1 – Zone 2) so the time allowed for this journey is 90 minutes. He travelled via Crystal Palace and as a result almost exceeded the maximum journey time.

I recognise TfL's view that they expect most travellers to either take the North and West London Lines changing at Willesden Junction or to travel via Zone 1, but we consider that travel via Crystal Palace is a reasonable route because it involves only one change and is the preferred route on the National Rail journey planner (although not on the TfL journey planner).

We also had a recent case regarding North Wembley to Denmark Hill where the passenger exceeded the Maximum Journey Time available. He travelled from North Wembley to Clapham Junction; Clapham Junction to Battersea Park; and Battersea Park to Denmark Hill. I recognise that TfL do not expect passengers to take this route, although again it is listed as the main route on the National Rail journey planner. In this passenger's case, as well as exceeding the maximum journey time, he hoped to get the lower rail only fare avoiding Zone 1 (although no such fare exists for this particular route) rather than the higher Tube-train fare.

TfL response :

“Oyster will provide refunds to passengers if they exceed the maximum journey time, but the onus is on the passenger to report this. TfL accept that there is a case for extending MJTs for some journeys around Zones 1 – 4 and are intending to discuss these with the train operators. Any changes would be subject to agreement with the train operators. TfL hope to introduce these changes in January.

TfL recognise that there is a problem for some journeys from North West London to inner South London stations where the MJT is quite tight. They are getting round this by changing the assumption of how many zones you are travelling through to make the journey but not changing the fare. This will change in September.”

## **Oyster validators at National Rail stations**

We note that the on platform validators have been removed at London Bridge, which cause particular problems for those using a combination of tickets e.g. if you have a paper Sidcup to London Terminals ticket and use Oyster PAYG to travel onwards to Farringdon or St Pancras. Are there plans to remove any others or is it at request of TOCs?

We recognise that TOCs oppose validators on platforms due to ticket fraud, but the result is that passengers taking orbital routes are tending to be disadvantaged as their particular journeys are not recognised. Examples from casework include Shadwell to Clapham Junction via Crystal Palace which is based on the Zone 12 fare rather than Zones 234; North Wembley to Bromley South via Clapham Junction which is based on Zones 12345 rather than Zones 2345. We think that this issue will become more pronounced when the ELL is extended to Clapham Junction. Is it possible to install route validators (“pink validators”) at key interchanges in South London e.g. Crystal Palace, West Croydon and Clapham Junction?

TfL response :

“TOC policy is to not have Oyster validators or route validators on their platforms. The validators were removed from Platforms 5 and 6 at London Bridge at the request of the TOC who were concerned that it was leading to ticket fraud. Proposals to install route validators at stations such as Clapham Junction were opposed on the basis that this would add complexity to the system. Introducing route validators would be expensive and TfL are not inclined to fund them.”

### **Same station charge**

When previously discussed, if a passenger abandons a journey at a tube station, they are still charged and the onus is on them to get a refund. There was a discussion previously about allowing a short period for passengers to abandon journeys and to be not charged a fee. Has TfL taken this forward?

As I understand it, the system was able to pair up abandoned journeys at one London Underground station with starting a different Underground journey nearby. However, it could not associate an abandoned journey on the Underground with a change to another mode e.g. National Rail or bus. Is this still the case?

TfL response :

“TfL found that when Oyster was initially introduced, that some passengers were touching in and touching out at the same set of barriers to avoid fares. They therefore introduced same station charges at gated stations. Therefore you are charged the same station charge if you touch in and then touch out within two minutes at a gated station. If you start another journey at a different station within 45 minutes, the same station charge will cancel out automatically.

The charge can be removed at LOROL and tube ticket offices (but not at most rail stations) or by the Oyster Helpline. TfL plan to enhance their ticket machines to enable them to cancel the charges too.”

### **Oyster Extension Permits**

It would be useful to have an update on whether there has been an increase in usage and if their use is consistent across London.

We have recently had a case where a passenger claims that the barriers at Charing Cross will refuse any Oyster going beyond the travel card zone even if the card also has Pay as you go on it unless there is an OEP on the card. The passenger was penalty fared as a result. Is this correct and is this an optional setting?

The passenger claimed they had no knowledge of OEPs and that there is no signage on the issue at her station (Hither Green). The operator has stated that Oyster is a TfL product and therefore the problem lies with you. While we do not accept this view, are there any plans for improving knowledge of OEPs ?

TfL response :

“The barriers will always let you through if you have PAYG on your card and touched in at the start of your journey. TfL still do not consider that there is much value in retaining OEPs, but the TOCs need to be persuaded of this. There was an initial leaflet issued in January on this issue, but it is not clear what proportion of Oyster users are aware of them.”

### **Out of Station Interchanges (OSIs)**

Out of Station Interchanges enable passengers to make through journeys despite going through barriers to interchange. So, for example, passengers travelling from South East London stations to Charing Cross are given 20 minutes to carry on their journey from Charing Cross or Embankment Underground stations. As a result they are charged for one through journey on Oyster rather than for two separate journeys at a higher cost.

We note that most of the common interchanges are recognised by the system, but we suggested about 15 additional ones which we considered were worthy for consideration. In particular, we considered that Bank and Mansion House underground stations are frequent interchanges with passengers from Cannon Street (Southeastern) as Bank is a useful route to Chancery Lane/Holborn etc for those travelling in from south east London by rail and Mansion House is fully open at weekends while Cannon Street is closed through to next year at weekends. Similarly, we suggested that consideration be given to Shoreditch High Street – Liverpool Street as an interchange for journeys from south east London to north east London; Warren Street to Euston Square and Great Portland Street to Regents Park.

TfL response :

“TfL intends to measure the usage of interchanges to decide on whether they should be made into OSIs. Because any change to the list of interchanges would have a possible impact on revenue, they require agreement with TOCs. They accepted our argument that there may be merit in some of our suggestions, but they would need to look at each case on its merit. The number of OSIs was not unlimited due to the capacity of the system.”

### **Oyster Usage Statements**

Oyster Usage Statements issued at stations indicate the time you board a bus, but indicate the time you complete a journey on the tube or train. We have recently had a penalty fare case where the appeals body (IAS) assumed that the passenger did not have a valid ticket at the time her ticket was checked because her statement appeared to suggest that she started her journey after her ticket was checked. Is there a reason for the current format and can they be improved?

Similarly, the journey history online doesn't actually tell you how much each journey costs – just the balance left on your card. This makes them hard to understand.

TfL response :

“TfL recognised that there are problems with the statements currently, but changing this is not a high priority due to funding. Making changes to the software would be expensive, but they hope to make more and better information available in time.”

## **Railcard discounts**

It would be useful to know how many Oyster card holders have registered for Railcard discounts now they are available.

TfL response :

“Currently around 50,000 Oyster cards have a railcard discount applied.”

## **Conditions of Carriage Policy**

There are an increasing number of issues affecting the ticketing contract that are not currently reflected in the Conditions of Carriage. TfL’s policy has traditionally been that the Conditions of Carriage should be the primary reference point for passengers (and by extension the casework team) in policy matters.

TfL response :

“TfL are concerned that the current Conditions of Carriage is getting unwieldy and has to be updated regularly. Nevertheless, they accept that traditionally they have stated that the Conditions of Carriage explains the ticketing contract and therefore it should be comprehensive. They accept that conditions relating to specific products may be better contained elsewhere. Nevertheless, they are meeting their legal team to clarify the policy going forward.”