

21 March 2016

Dear Mr Jipps

### **PROPOSAL TO ADJUST TICKET OFFICE OPENING HOURS**

This document is the official Transport Focus response to Govia Thameslink Railway's (GTR) proposal to change the opening hours of the ticket offices as appended, in full detail, to this document.

The list of affected stations where the consultee is Transport Focus:

#### **Model 2 stations (Hosted & Concourse Sales Point: Appendix B)**

- Southern  
Falmer  
Lancing  
Reigate  
Shoreham-by-sea

#### **Model 3 stations (Partial Ticket Office, Hosted & Concourse Sales Point: Appendix C)**

- Great Northern  
Hitchin  
Huntingdon  
King's Lynn  
Letchworth Garden City  
Royston Herts  
Sandy  
St Neots
- Southern  
Angmering  
Barnham  
Bexhill  
Bognor Regis  
Burgess Hill  
Chichester  
Crawley  
Eastbourne  
East Grinstead  
Hassocks  
Horsham  
Hove  
Lewes  
Littlehampton

Polegate  
Portslade  
Worthing

First of all, we are grateful to you for taking the time to meet with us prior to the consultation, which gave us the opportunity to raise some of our initial concerns. We also acknowledge that a Station Host will be available for hours of operation in excess of the current ticket office hours and every station affected by these proposals will have a member of staff on duty from the first train in the morning to the last train of the day, 7 days a week.

As explained below, Transport Focus opposes the proposal.

Operators are obliged to display notices prominently at affected stations for at least 21 days to inform passengers of the proposed changes and how to object by contacting us. We received 1,040 objections by email from passengers. Throughout the process, Transport Focus has received in the region of 50-60 letters per day. Additionally, we have received a large number of postcard responses. Given the volume we will send a breakdown of the exact figures as soon as they have been verified. We note that GTR had its own consultation response inbox and ask that details of responses through this are considered and shared.

There are three broad areas around which we have outstanding concerns:

- 1) **Range** - Are passengers still able to buy every possible product from the host that they could from the ticket office previously?

In both Category B and C stations the host will have access to a ticket office machine in the concourse. Does this include:

- a. Season tickets (not just renewing but registering new photo cards etc.)
- b. Railcards (not just renewing but new applications)
- c. Advance Purchase tickets
- d. Seat reservations
- e. Use of rail vouchers (ticket purchase or cash swap)
- f. Ticket refunds?

- 2) **Queuing times** - Will it take passengers longer to buy what they want?

Ticket offices have queuing standards (3mins peak and 5mins off peak). Will these apply to the host or even TVMs? What protection do passengers have if they have to wait 20 mins for the host to appear from other duties?

Currently the queue standard means that GTR would have to make reasonable endeavours to meet the targets, including deploying extra staff or other resource. Will this remain an option?

During particularly busy times, what can GTR do in terms of recognising high volumes of

passengers? Will there be the ability to provide extra provision to ensure there are sufficient staff on duty? A single host might not always be enough.

How will Hosts manage high volumes of passengers? Will they have a queuing system for the Host at busy times? How will the Host manage queues?

How will they ensure that revenue protection takes into account/is informed of queue lengths and when the Host is off sick etc. and not all tickets can be sold? How will GTR ensure that passengers are not issued with Penalty Fares in these circumstances?

### **3) Ongoing Protection**

Schedule 17 of the Ticketing and Settlement Agreement (TSA) provides protection for passengers in staffing at their stations, as well as a clear process for how this changes. How can this protection be maintained for passengers in future? Is there a way in which the staff headcounts and shift patterns can be maintained?

We would not like to see this lost, as it would mean we would have no mechanism to challenge GTR if Hosts were removed at any point in the future. There would be no reason to consult, and the net effect would be a bypass of Schedule 17 protection, leaving passengers to use TVMs. What assurances can be given?

Given the scale of this particular submission, we feel that a longer consultation period would have been appropriate. The TSA was written without internet retailing being a consideration and with single station submissions in mind.

To conduct a genuine consideration of this proposal, we would need more time. This would allow us to:

- Analyse in detail, all 84 sets of ticket issues data
- Quantify the high volume of written objections
- Understand the particular concerns of passengers at different stations facing different proposals (A, B or C models).

On the basis of the facts above, passenger comments we received, and lack of time needed to seek the necessary assurances, Transport Focus opposes the proposals.

### **FINAL POINTS**

Our position is based on the as-is situation for the affected stations. Analysing ticket issue data was difficult in the available timeframe. This information is usually made available at the very beginning of the process, but the Model A and B data was received on the 9/10 March.

Should the timetables on routes for these stations change in the future, or passenger usage increase significantly, the ticket office opening hours should be reviewed to ensure passengers are not disadvantaged.

Transport Focus is aware of the need to review staffing at stations from time to time, especially in the current economic climate. However, our research shows passengers place a high value on the availability of staffed ticket offices, as well as the information and facilities often contained within station buildings. Regarding value, passengers commonly make reference to:

- Security
- Shelter
- Access to baby change / toilet facilities
- Ticketing options (including season ticket applications)
- Advice on routes
- Disruption information.

It is important that any restructuring of staff presence is balanced against the need of ensuring that passengers receive the service and facilities which they reasonably expect.

I would be happy to discuss any of the points made or amendments to the proposals with you.

Yours sincerely,

**Matthew Andrews**  
**Passenger Team Executive**  
Transport Focus