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**Transport Focus response to ORR's initial consultation:  
proposals to modify Network Rail's network licence requirement on timetable  
publication**

Transport Focus strongly opposes the proposal to remove the reference to 12 weeks in the Network Rail License and replace it with a reference to what is set out in Part D of the Network Code. Our objection to this change is two-fold:

- First, we believe that reducing the period in which passengers and potential passengers can rely on times being accurate on apps and websites is contrary to the passenger interest.
- Second, we believe that replacing the current specific time period with reference to the Network Code weakens the protection offered to passengers in future. The Network Code is an industry document that can be amended without public consultation, whereas a requirement stipulated within the License itself can be amended only through a transparent public process.

Expanding on the first of these points, we have grouped our observations under the four headings below.

**Why is eight weeks worse for passengers than 12 weeks?**

Accuracy eight weeks in advance is self-evidently less good than 12 weeks in advance. But why does it matter to passengers? When people are planning certain types of journey, particularly leisure journeys, that extra four weeks of certainty that the timetable is fully accurate really matters. Whether the railway is an option for them on a particular date in three months' time can be critical to booking accommodation or tickets for other events (for example, concerts or sports). For people wishing to finalise their plans and have peace of mind that everything is 'sorted', not having confidence that the timetable is fully settled for a further four weeks would be singularly unhelpful.

### What do passengers themselves say?

In a survey Transport Focus carried out to inform its response to this issue, appended for information, we found that among passengers looking up train times and prices one month or more before travel, “around three months” is the preferred period of accuracy for almost half (48 per cent). One in three (34 per cent) among those looking a month before; four in ten (42 per cent) among those looking two months before; over half (54 per cent) among those looking three months before. It should be noted that “around six months” is favoured by (34 per cent) of those looking two months before. For them, dropping from 12 to eight weeks is going further away from their preference, not towards it. This most recent survey chimes with previous Transport Focus research that has also shown passenger support for 12 weeks as the period the timetable should be accurate.

### Implications of publishing a draft timetable

Network Rail’s Better Timetables for Passengers and Freight (BTPF) programme proposes to facilitate train companies selling tickets 12 weeks in advance by, in effect, showing a draft timetable between 12 weeks and 8 weeks. We have significant concerns about this, summarised as:

- The industry has not demonstrated that the level of change to the timetable between draft and final will be minimal – indeed the data we have seen indicates that there could be significant post-publication change (which for some passengers will mean changes after they have bought their ticket).
- The industry does not have a comprehensive mechanism to get in touch with passengers who have already bought tickets when the timetable changes post-purchase. The Smarter Information Smarter Journeys programme has made great strides in this direction, but not all train companies and not all ticket retailers yet have this facility. And it isn’t clear how the gaps will be plugged. But even if they were, the words of one ticket retailer should be noted: “just because you can tell a customer post-purchase that the time of their train has changed doesn’t mean it is a good thing to be doing”
- The industry has not acknowledged that passengers who are affected by changes after the timetable is published are likely to be travelling late at night and at weekends, when engineering work generally takes place. In our view there is an unacknowledged risk that passengers could become stranded or encounter difficulties when fewer staff – in particular managers – are available to resolve problems.

### Is this change necessary anyway?

Throughout development of the Better Timetables for Passengers and Freight (BTPF) proposal, Transport Focus has questioned the need to drop from 12 weeks to 8 weeks. The industry states that introducing a third change to the permanent timetable each year (that is, the service that would be provided if no engineering work was taking place) is incompatible with finalising the timetable 12 weeks in advance. However, the industry has not been able to explain why reasonably efficient train planning functions (whether at Network Rail or train operators) cannot accommodate a change to the permanent timetable three times each year and achieve 12 weeks. If the permanent changes are equally spaced, train planning staff would never have less than 17 weeks forward visibility of the permanent timetable. Is the industry really saying that it needs more than five weeks to amend the permanent timetable on a given date to show a revised train plan and associated replacement buses? Even if the industry could demonstrate that this is necessary, because of workload concerns by train operators the original proposal for three permanent timetable changes of equal status has

been replaced with two opportunities for significant change (as now) and a third opportunity to be used in extremis. It therefore appears that 12 weeks is being sacrificed to achieve a third timetable change that is now expected to be distinctly 'light' in nature.

In conclusion, Transport Focus feels that ORR should not allow the proposed change to proceed. Furthermore, we feel that ORR should require the industry to present a plan to re-adhere to the current process at the earliest practicable date.

**Guy Dangerfield**  
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