



LONDON TRANSPORT USERS COMMITTEE

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Our Ref:
Your Ref:

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Gill James
Manager, Railtrack Regulation
Office of the Rail Regulator
1 Waterhouse Square
138-142 Holborn
London EC1N 2TQ

Dear Gill

Proposed modifications to Railtrack's network licence: reporter, regulatory accounts, and annual return

I am writing in response to the consultation paper published by the Rail Regulator in March 2001, inviting comments on proposed modifications to Railtrack's network licence.

- (a) New provisions to Condition 15 : Provision of information to the Regulator and the Authority.

We welcome this proposal in principle. While we have no specific interest in regulatory financial statements, the Network Management Statement reconciliation or information relating to enhancements and their logging up, we do have a keen interest in the performance of the network as a whole, as it impacts on passengers.

At present, the only sources available to us are the SRA's public performance measure (which gives no causal attribution) and Railtrack's network maintenance and renewal quality indicators (which give no disaggregation below network level).

In order for us to gain a proper understanding of the factors affecting the quality of service experienced by passengers, it is important for us to have an insight into the causes of delays and cancellations (not currently provided by SRA) and their effects (not currently provided by Railtrack).

Such information does exist within the industry, in the form of lost minute calculations. We hope that the new provision requiring Railtrack to supply "any statistical or other data specified by the Regulator" may provide a means of accessing this. The current six-monthly Railtrack reports, while interesting as broad-brush accounts of current trends, are of limited use to us because (a) the data are not reported TOC by TOC (or, better, TOC service group by TOC service group), and (b) delays which are not caused by maintenance and renewal factors - the vast majority of the total - are not itemised at all.

We are looking for early improvements in this area.

(b) New Condition 22 : Regulatory accounts

We have no objection to this, but little or no interest in the information sought.

(c) New Condition 23 : Appointment and role of Regulator.

We have no objection to this, but are not in a position to offer any informed view as to the merits of and/or necessity for the proposal.

Yours sincerely

John Cartledge
Deputy Director