



By e-mail & Letter

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Dear Mr Rubak

LOCAL OUTPUT COMMITMENTS AND THE PROVISION OF INFORMATION – DRAFT CONCLUSIONS

Thank you for the opportunity to comment on the Regulator's Draft Conclusions.

ScotRail Railways Company would endorse the views contained in the response of owning Company National Express Group, and comment additionally as below:

ScotRail have for some time been in consultation with Network Rail over Local Output Statements, and the outputs from that consultation should form the framework of our Local Output Commitments.

Clause 4.23 Provision of Information

Aside from the mandated delay minutes per km information ScotRail would look for the following information.

Details of Network Rail Performance Initiatives and progress on such with specific regard to:

Lineside issues

Vegetation management, fencing, scrap and litter, and drainage

Seasonal Preparedness

Infrastructure Integrity

Two measures

Track Quality measured against average target shortfall
(although better measures may be developed)

Broken Rails measured against a reducing target

Possession efficiency

Measures of efficiency and utilisation in relation to possessions to be provided. Provision of this information is under development but should ultimately enable TOC's to confirm that pain borne during possessions is kept to a minimum and levels of work during the possession and future benefits are maximised.

TSR's

Reduction of TSR's requires constant monitoring which is currently dealt with outwith the LOC. The LOC will however specify the frequency required for dissemination of information and the frequency and level of meetings between the TOC's and Network Rail to discuss this issue. The LOC will also contain the Zonal target for TSR's .

Enhancements

Following on from Customer Reasonable Requirements, we would look for the LOC to detail initiatives we would expect Network Rail to carry out to facilitate known business plans or service enhancements.

Such information as detailed above will give the TOC comfort that Network Rail are addressing problem areas, and enable realistic forward business planning within the parameters available through evidenced progress.

Stewardship measures (Clause 4.24(b))

Many of the measures detailed in Clause 4.12 relate to issues detailed above. In general ScotRail would not seek quantities of information regarding the condition of the network unless it had specific cause for concern. There is always a danger with data that it is produced because it is there and not because it can be utilised to any purpose. We would seek data about specific problem areas known, data relating to which is already encompassed above. We would expect the Commitments to be sufficiently flexible that should new problem areas be identified relevant data could then be elicited to enable ongoing monitoring of the new "problem area".

Practical Application (Clause 4.24(c))

This will vary from service group to service group. Improvements in network reliability or specific network enhancement will allow targeting of journey length improvements or increased service reliability or frequency. It is difficult to be very specific as business plans will develop with the level of progress towards targets achieved. Continuous performance improvements would hopefully lead to increased revenue, reduced performance and charter penalties giving more cash to invest in developing services. This movement towards nirvana, however will only be achieved when the reliability of the predictions and the speed of improvements have been shown. The LOC's are very much a first step.

Format (Clause 4.24(d))

We strongly feel that the format of Local Output Commitments should be determined Locally and not prescribed by the Regulator.

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