

31 October 2007

Les Waters
Manager, Network Regulation
Office of Rail Regulation
One Kemble Street
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Dear Mr Waters

Periodic Review 2008: Network Rail's Outputs.

Thank you for the opportunity to respond to this document. GNER wishes to raise the following issues:

GNER supports the ORR's proposal for disaggregated outputs. However for these to be meaningful disaggregation should be by TOC. The current level of punctuality performance on ECML shows how aggregated performance targets do not influence performance for a TOC which operates relatively few but very high value trains.

We support the proposal for Network Rail's delay minute targets to be Customer Reasonable Requirements. To give this further power we request ORR to consider a mechanism for a simpler method of incentive and or enforcement when targets are not achieved. We believe there is a link here to Customer Satisfaction, also mentioned in this consultation document.

We question the proposal that Network Rail should maintain the capability of the network and condition of stations as at 1 April 2009. We consider that Network Rail should be targeted to achieve a numerically defined level of enhancement to the Network. The ECML operates in a competitive environment and we are not aware that rail's competitors are merely seeking to maintain the status quo. Network Rail should be incentivised to act as though it were operating in a competitive environment.

As previously stated in responses to the RUS and Network Rail's Strategic Business Plan, we have concerns over the capacity available on ECML and the ability of the infrastructure to deliver the HLOS growth specification and performance specification and safety target. We urgently request ORR to consider the infrastructure requirements for the ICEC SLC 2 timetable taking into account Open Access and Freight requirements for inclusion in CP4.

We support ORR's proposals for a Network availability measure. We would wish for this to be disaggregated either at TOC or Network Rail Strategic Route level.

We support ORR's proposals in relation to assets for a "dashboard" of indicators. Again, we wish to see these disaggregated to Strategic Route level.

We support ORR's views on customer satisfaction. We suggest that ORR considers linking Network Rail's management incentive arrangements to the success of its customers using a basket of measures such as safety, performance and network availability. In particular we would support the linking of Network Rail's route and territory based managers to have an incentive based specifically on Network Rail's performance for their specific customers.

Yours sincerely

Adrian Caltieri
Manager, Regulation & Compliance