

promoting quality public transport.....

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14th July 2011

Dear Mr MacLellan,

**Consultation by DfT on the level and deployment of GV and PSV
Operator Licence Fees for 2011**

TravelWatch NorthWest (TWNW) is an independent Community Interest Company which aims to champion and represent the views of public transport passengers in NW England. As such it would be inappropriate for us to comment on most of the matters (mainly the level of licensing fees) in this consultation. We leave that to operators' trade associations.

Role of the Traffic Commissioners.

However section 8 does raise the question of the non-statutory roles which Traffic Commissioners (TCs) currently perform. We note that these have a cost (£0.5M) which has in the past been absorbed by employing Deputy Traffic Commissioners. These Deputies are paid a daily rate on a "draw down" basis for the duties they perform – mainly those public hearings which the TCs cannot conduct because of conflicts with their non statutory roles.

In answer to your **Question 16** we are content that Operator licence fees should fund both the core statutory activities and the consequences of the "non core" activities of Traffic Commissioners.

We have examined the three examples given in the consultation of TCs' "non core" activities. Whilst we would ideally like to see all three retained, we have nevertheless ranked them in order of priority should that not be possible. They are in descending order

- Stakeholder liaison
- Media interaction
- Education and training of operators.

Beverley Bell, Traffic Commissioner for the NW, has attended and spoken at a number of TWWN conferences. She has commented on how useful she has found it to be able to hear **bus passengers' voices**. We too value highly the dialogue we have with her. We would not like to see that door even partially closed.

There is widespread confusion amongst those wishing to comment or complain about bus services concerning the respective, and in some cases overlapping, roles of **TC's, Passenger Focus, Bus Users UK and the Bus Appeals Body**.

Nowadays more than ever interaction with the media (including the transport press) is moving up our agenda. We know that most bus passengers are unaware of the existence, let alone the regulatory role, of TCs.

The third listed "non core" activity of educating and training bus operators is of equal importance but possibly the easiest to buy in, for example from professional institutes like the Chartered Institute of Logistics and Transport, further and higher educational establishments, trade associations or Social Enterprises like ourselves. However in any such academic activity there is a useful exchange of views from which TCs cannot but benefit.

In summary, we do not think it helpful to require TCs to focus wholly on just their core statutory functions.

Thank you for the opportunity to comment.

Yours sincerely,

(signed)

John Moorhouse
Company Secretary

(Author of paper – Paul Fawcett MPhil. FCILT)