

## Question 1

**Do you think our intention to have a consistent smart payment option available across Scotland and on all main public transport modes would promote use of public transport in Scotland?**

Yes

Please explain your answer.

There are a number of ways in which having a consistent smart payment option could improve the experience of passengers using public transport in Scotland. Nonetheless, CAS would recommend that regardless of the option which the Scottish Government chooses it is key that there are offline ways in which to purchase cards; buy tickets; and/or top-up cards. CAS recently undertook a paper-based survey regarding digital access and over 1,200 people took part. Of these, almost one in every five respondents never used the internet (18%)<sup>1</sup>.

In October 2017, CAS undertook a survey seeking the public's opinion of bus transport and asking about their priorities. This received over 4,500 replies and forms the basis of our response. Within these responses the desire for smart ticketing to be introduced was mentioned a number of times and a number of issues related to this were raised.

One advantage highlighted was that smart payment options would prevent the need to have the correct change to use public transport. Comments made included:

*“Value for money is not as much of an issue for an occasional user as knowing the fare and having correct change”.*

*“It is ridiculous that in a global city such as Edinburgh we are expected to pay in correct change”.*

CAS also held a Rural Bus Summit<sup>2</sup> last year where e-ticketing; mobile apps; and smart ticketing were highlighted as aspects of existing best practice in place, which could potentially be expanded.

However, it is important that any changes which are made are well publicised and allow sufficient time for the public to be informed of these changes. To not do so could potentially discourage the use of public transport in Scotland.

---

<sup>1</sup> CAS (2018), *Disconnected: Understanding digital inclusion and improving access*(currently unpublished)

<sup>2</sup> A summary of this event is available online here:

[https://www.cas.org.uk/system/files/publications/bus\\_summit\\_summary.pdf](https://www.cas.org.uk/system/files/publications/bus_summit_summary.pdf)

## Question 2

**Do you agree that the scope of smart ticketing should – for now – be limited to the modes and services outlined above?**

No  ✓

Please explain your answer.

In response to the CAS survey, a variety of potential smart ticketing options was suggested.

A number of respondents specifically mentioned the Oyster card as a positive example of smart ticketing. The daily cap aspect of this card was also mentioned as a desirable feature.

Some respondents preferred contactless payment either with a bank card or Android or Apple Pay to using a smart card.

CAS would recommend that in going forward the Scottish Government remains open to multiple types of smart ticketing.

## Question 3 - epurse

**a) Are you in favour of a clearly defined national epurse scheme?**

Yes  No

**b) Should all relevant bus, rail, ferry, tram and subway operators be expected to participate in a national epurse scheme?**

Yes  ✓

**c) Should participation in a national epurse scheme be monitored and controlled?**

Yes  No

**d) Should sanctions be imposed for non-compliance in a national epurse scheme?**

Yes  No

Please explain your answers.

CAS would encourage full participation in a national e-purse scheme by all relevant rail, ferry, tram and subway operators. It is important this is monitored, for example, to see who are using these services. CAS does not have an opinion on whether participation should be controlled or if sanctions should be imposed.

Question 4

- a) **Are you in favour of a clearly defined multi-modal, multi operator regional smart ticketing scheme?**

Yes ✓

- b) **Should all relevant bus, rail, ferry, tram and subway operators be expected to participate in a multimodal, multi operator regional smart ticketing scheme?**

Yes ✓

- c) **Should participation in a multimodal, multi operator regional smart ticketing scheme be monitored and controlled?**

Yes  No

- d) **Should sanctions be imposed for non-compliance in a multi-modal, multi operator regional smart ticketing scheme?** Yes  No

Please explain your answers.

The importance of smart ticketing being available on multiple modes and operators was highlighted in the CAS survey. Comments supporting this and highlighting current limitations in this area included:

*"I would like to see smartcards that can be used on multiple transport modes".*

*"More use of smart ticketing to allow interchange with other transport modes".*

*"one smart card would be ideal and all transport integrated".*

*"The worst thing is the lack of an interoperable smart card ticketing system. I need to visit my elderly parents, which can involve two companies, two apps, or let a bus go past because I haven't bought a ticket for that company".*

*"An oyster card style system that incorporates all buses trains and subways would bring this city out of the middle ages".*

*I also think it would be helpful to have a new 'Oyster' style travel card available in the Greater Edinburgh/Lothians area covering buses, trams and Scotrail train services".*

*"It is a priority I think to look at an integrated ticketing system across all public transport providers".*

CAS would recommend that multiple modes and operators of transport be covered by any smart ticketing which is introduced. This would improve the experience of passengers of public transport. As above, CAS hopes smart ticketing is monitored but does not have an opinion on how it should be controlled or any potential sanctions.

CAS notes that this consultation does not propose smart ticketing for all modes of transport, in particular community transport and taxis do not appear to be included. CAS recently held a discussion around public transport with CAB staff at our Policy Forum<sup>3</sup> and a number of points relevant to this consultation were raised. Firstly, the potential use of taxis and dial-a-bus services was highlighted as one solution in areas not well served by public transport and as a lifeline in areas where they were operating well. CAS would also recommend that the Scottish Government give consideration to expanding the scheme to include these wider forms of transportation.

#### Question 5

**Are you in favour of new legislation that requires transport operators to participate in national and regional smart ticketing schemes?**

Yes  No

Please explain your answer.

CAS recognises it is important that transport operators participate in national and regional smart ticketing schemes but does not have an opinion on how this is achieved. CAS would hope that the Scottish Government would respond if transport operators did not participate in smart ticketing schemes.

#### Question 6

**To ensure delivery of a consistent approach to meet the expectations of passengers now and in the future, should we establish a single governance group so that the technology implemented across Scotland for smart ticketing schemes is controlled?**

Yes  No

**Should such a governance group be established formally and supported by legislation?**

Yes  No

**Should such a governance group have a role in advising on development, implementation or administration of smart ticketing schemes?**

Yes  No

**Are there any other areas that a governance group should have a role in?**

Yes  No

---

<sup>3</sup> The Policy Forum is a Standing Committee of the Board of Trustees. The Policy Forum meets to discuss policy issues and priorities and make recommendations to the Board of Trustees on issues of policy.

Please explain your answers.

**Are there any other issues you wish to raise which are not covered above?**

The Scottish Government welcomes any further comments and suggestions on smart ticketing schemes or governance, and how these might be improved or made more sustainable.

**Question 7 Do you have any other comments about any of the issues raised in this consultation?**

Yes  No

If so, please use the box below to provide details.

My comments: