

## **Bus Services Act: Open Data Consultation Response**

West Yorkshire Combined Authority recognises that bus use is a fundamental and significant component in the delivery of a modern, integrated inclusive transport network for West Yorkshire. In addition to the economic benefits of connecting people to places, the bus is an effective tool for social policy to deliver inclusive growth; providing the jobless with access to work; young people to education and training; and providing a way out of social isolation for older and disabled people. The Combined Authority recognises the importance of ensuring that all passengers have access to the information they need to make informed travel decisions. The Combined Authority therefore welcomes the proposals set out to develop the provision of digital Open Data, provided that the costs of provision of this information are not passed onto the taxpayer.

One of goals of the Combined Authority is to create the best bus system in Europe, where catching the bus is an attractive and natural choice for everyone. The Combined Authority is committed to providing passengers with a better and more consistent experience of bus use and Bus Strategy sets the target to grow the number of bus passengers by up to 25% by 2027. To achieve this, over the last few years the Combined Authority have worked closely with bus operators and district councils to introduce a number of bus initiatives including; 'YourNextBus', a live mobile timetable delivered via apps, SMS and mobile internet; the introduction of the Mcard, a smart multi-operator ticket scheme, used by a third of all West Yorkshire bus trips; investment into vehicles by bus companies to make them attractive and accessible, the majority of which have low floors and have smart ticket machines.

Within the consultation response form, local authorities were asked to respond to Question 51 onwards.

### 12. Distributed data model

**51. Have you heard of the term 'open data' before? ie where data is shared freely and is machine readable so that it can be used by application developers to create apps for consumers.**

Yes.

**52. Were you aware that the Department for Transport would be requiring bus operators to share data (open data) about local bus services in the next few years?**

Yes.

**53. A distributed data publishing model is one where the industry and individual bus operators are responsible for creating and publishing their own data. Do you believe a distributed data model is the right approach for the bus industry?**

Yes, because a distributed data model permits the publication of data as close to source as possible, making individual publishers accountable, which is in the best interest of customers. However, the Combined Authority would also like to raise

the issue of how data quality is checked and maintained if data is published directly by operators.

**54. What benefits do you think a distributed data publishing model could bring for passengers?**

Provided adequate quality assurance processes are in place, then a distributed data publishing model will deliver high quality data to customers. Mechanisms need to be in place ensuring a distributed model creates high quality, accurate data which can be developed into applications which will result in more accessible information available to customers. Customers need to have confidence in the data (routes, timetables, fares and real time information), so they can make informed travel decisions, and this confidence will only develop if they are provided with accurate and reliable information.

**55. What impact do you think a distributed data model would have upon bus operators?**

A distributed model puts pressure on data publishers, who don't all have the same capability or resource to publish data, so the Combined Authority believes that DfT will need to provide adequate support so that any costs aren't passed to the customer.

**56. A data user is someone who would need to use open data to create applications, products and services for passengers, accessing the data through the bus open data portal. For example, an application developer. What features or functionality in a bus open data portal would help data users?**

The interface needs to be well developed and fit for purpose, with developers and publishers consulted. Data integrity should also be carefully considered so that data are released in a format which can be easily used by application developers.

**57. A data publisher is some who would need to create and publish data so that it was openly available on the bus open data portal. For example a bus operator. What features or functionality in a bus open data portal would help data publishers?**

See Question 56.

13. Routes and timetable

**56. As part of the bus open data requirements, the Department for Transport will require all operators of local bus services across England to open up routes and timetables data using the TransXchange format. Do you think this is the right approach to opening up routes and timetable data?**

Yes.

**57. The route and timetable data will be used by application developers to create transport planning apps for bus passengers. What types of routes and timetable data do you think would be most beneficial for bus passengers? Please describe the data and explain your response.**

Customers should be able to easily access information on all publicly accessible routes. Customers need to have confidence in the data (routes, timetables, fares and real time information), so they can make informed travel decisions.

**59. If you work for a local transport authority, do you currently publish routes and timetable information for passengers (website, apps)?**

The Combined Authority uses the bus service registration information to populate routes and timetables in its central database that facilitates the production of information across all customer focused outputs – printed timetables, bus stop displays, online timetables and journey planners on behalf of operators. Quality assurance forms part of the process. The Combined Authority release this data which forms the part of the Traveline National Data Set (TNDS) which is made available as open data and is already used by third journey planning apps including google.

**60. What impact might the need to provide routes and timetable data from 2020 have upon bus operators? Please explain your response.**

The proposals mean the responsibility for publication of route and timetable data (and quality assurance) will fall to bus operators, which is likely to have a financial impact on them, particularly the SMEs operating in the market (through the need for hardware and software). There will still be a requirement for the Combined Authority to consume this data in order to generate its passenger information outputs such as timetables. Publishing this data is in the best interest of the passenger so the Combined Authority strongly supports this proposal, however the Combined Authority would not expect to see the cost of the provision of such data to be passed to taxpayers.

**61. What support or assistance do you think bus operators might need to meet the requirements? Please explain your response.**

The Combined Authority anticipates the proposals to have a financial impact on operators, however these can be mitigated with support from DfT. The Combined Authority strongly supports the publication of route and timetable information and believes the benefits to the customers need to be at the forefront of these initiatives.

**14. Fares and ticketing**

**58. As part of the bus open data requirements, the Department for Transport will require all operators of local bus services across England to open up fares and tickets data using the NeTEX format. Have you heard of NeTEX before today?**

Yes.

**59. If you answered yes (you have heard of NeTEX), do you think this is the right approach to opening up fares data?**

Yes.

**60. What types of fares and ticket information would be the most beneficial for customers? eg singles and returns or multi operator etc.**

The Combined Authority believes that information on all types of fares and tickets should be readily available to the public. Customers need the ability to choose the most appropriate ticket for their journey in advance of traveling. Providing information on a subset of fares is not in the best interest of the customer.

**61. If you work for a local transport authority, do you currently publish fares and ticket information for passengers (website, apps)?**

Fare and ticketing information is not currently published universally by operators and there is no agreed standard, making this a major challenge which needs to be addressed. The Combined Authority strongly supports the publication of fares information as this will assist customers in making informed journey decisions. However, the Combined Authority notes that a phased approach to publishing fare information is not in the best interest of passenger, and therefore disagree with this approach. Releasing the full range of fares allows passengers to choose the best value ticket for their journey. A phased approach, where simple tickets are released first, means that passengers could end up with the wrong product or be presented with inflated fares (particularly for multi-operator journeys), which could generate a negative perception and deter future bus use based on the information provided. In addition to developing a data standard for fares, consideration also needs to be given to the frequency at which fare data is to be published by operators. A lag time between a change in ticket prices and the fares data being consumed by third party apps, and ultimately delivered to the customers, may result in incorrect prices being advertised. This raises the question of who may be responsible for not selling tickets at the advertised price.

**62. What impact might the need to provide fares data from 2020 have upon bus operators?**

The Combined Authority reiterates the UTG's concerns about the investment needed by operators to achieve this and therefore the cost to the bus industry. However, the Combined Authority believes publishing fare information is in the best interest of the customer and their perspective needs to be paramount. The Combined Authority also do not expect to see the cost of information provision be passed onto the taxpayer. The benefits of making information on fares more transparent and accessible to bus users may result in increased patronage and in the long term may encourage a simplification of operators fare structures.

**63. What support or assistance do you think bus operators might need to meet the requirements? Please explain your response.**

See Question 61.

**64. How might local transport authorities respond to a requirement to provide fares data on behalf of smaller / medium sized operators as a bureau service? Please explain your response.**

Local transport authorities will need to be adequately financially supported if they were to provide a bureau service for operators. Any costs associated with implementing this need to be considered, so that the end result is not a cost to the taxpayer.

## 15. Real time information

- 65. Real time information refers to passengers and others receiving live updates about the status of their bus service, usually through a display, device or website e.g. the bus is 3 minutes away. What options are you aware of for the provision of real time information to bus passengers in your local area?**

The Combined Authority currently already collates and quality assures RTI from operators, including validating against registration information. This information is accessible to customers via a variety of means (digital displays at stops/stations, via the website, text messages and third party apps). The Combined Authority reiterates the UTG's concerns about the costs of this process at a time when funding is under severe pressure. Future funding constraints may mean that these services could become unaffordable without government support. It is important to note that not all operators have automatic vehicle location systems and are therefore there is not complete coverage of RTI in West Yorkshire.

The Combined Authority believes delivering RTI to customers is vital and bus operators and the Combined Authority have invested in an extensive RTI system, responding to customer expectations. It is recognised that the Combined Authority must maintain customer confidence in the information it provides and there is ongoing investment in the technology which operates the system. Our annual customer tracker survey and consultation feedback illustrates that RTI is used and valued by customers giving them an importance rating of 7.9/10. The real time data that the Combined Authority process is used over 4.5million times per month via websites, text messages and third-party apps. Further, the QR and NFC tags that have been installed at all 14,000 stops have been scanned over 1.5million times. Overall customers scored the real time information service 7.7/10 in our recent tracker survey. These statistics highlight how important RTI is to customers and the Combined Authority recognises its importance and therefore strongly support the universal publication of RTI.

- 66. Where do you think the requirement to provide real time information belongs?**

Operators will need to invest in the required hardware and software in order to capture RTI data. Local Transport Authorities should collate and publish this data so that it is easily accessible to customers.

- 67. How did you think bus operators should provide real time information for bus passengers? Please explain your response.**

See Question 65.

- 68. What do you think are the barriers that prevent local transport authorities providing a real time information service to bus passengers in their area?**

See Question 65.

**69. What incentives are required to help the industry move to a position of 100% real time information coverage across England?**

The financial implications on smaller operators to provide RTI data may force some out of business, potentially leaving local authorities to provide tendered services to plug the gap, which in turn has financial implications on them. However, a move towards complete coverage of RTI would result in a more universal standard for customers improving their experience of these services. In addition to reaching 100% compliance in operators releasing RTI data, the Combined Authority also believes there is merit in standardising the frequency (timing) operators provide RTI.

16. Information about the operation of the service

**70. The Department for Transport can require other types of information about the operation of bus services to be opened up as part of the regulations. In providing information to bus passengers about the operation of service, do you agree that the focus should be on providing real time information (how many minutes away the bus is) rather than bus punctuality information (how late the bus is)?**

Yes. The Combined Authority would support the DfT's view to impose legislation for the provision of real time information as this will provide the most benefit to existing and prospective customers of bus services.

The Combined Authority would also support sharing of aggregated bus punctuality information in a similar fashion to the rail industry, and for frequent services, average waiting times would be useful. Improving the reliability and punctuality of buses journeys are key objectives of the Bus 18 initiative (a joint enterprise to improve customer satisfaction and passenger experiences for West Yorkshire bus users). Sharing of punctuality data between operators and local authorities will allow us to address areas of concern and use the data to develop shared solutions for the benefit of customers and the operation of services.

**71. The Department for Transport is currently building a bus open data portal which will be a one stop shop for bus data. What other types of information do you think we need to capture and reference on the Bus Open Data portal? Please explain your response (eg accessibility).**

Focus on publishing high quality, accurate route, timetable and RTI data so that customers are presented with the full picture, allowing them to make informed travel decisions. The Combined Authority believes customers should be asked what information would enhance their journey or encourage them to travel by public transport, which will inform the additional data requirements.

17. Information about bus stops

**72. The National Public Transport Access Nodes (NaPTAN) database is a national dataset of all public transport access points and includes bus stops. Do you agree that a statutory requirement should be placed upon local transport authorities to maintain the NaPTAN datasets?**

Yes.

**73. What do you think currently prevents local transport authorities from maintaining NaPTAN data?**

The Combined Authority recognises the value of NaPTAN and NPTG datasets and routinely updates these so the proposals have no additional impact on the work already undertaken. The Combined Authority do however see benefits of bus operators regularly taking extracts of these datasets so there is a 'single version of the truth', reducing validation errors when producing timetable information for stops.

## 18. Tools and Training

- 74. The Department for Transport intends to provide guidance for bus operators, local authorities and other stakeholders involved in the opening up of bus data. What topics and content would you like to see included in the guidance? Please explain your answer, providing examples of potential content where appropriate.**

Complete, step-by-step, technical guidance for all publishers on the topics covered in the Open Data Bus Services Act. Guidance should clearly outline roles and responsibilities of publishers.

- 75. The Department for Transport intends to provide tools and training for bus operators, local authorities and data users (app developers) to help them open up and use bus data. What tools and training would you require to enable you / your organisation to publish data digitally?**

The Combined Authority believes that any guides, tools and training resources provided by DfT should focus on ensuring that the processes for opening up bus data are cost-effective, straight-forward, efficient and consistent.

- 76. What prevents you from accessing these tools and training already? Please explain your response.**

See Question 75.

19. Use and disclosure of information

**77. Do you agree that open data should only be used for the purposes of making information about relevant local bus services available to bus passengers?**

A fundamental principle of Open Data is that it is made freely available without restrictions on its use. Open Data on bus routes, timetables, fares and RTI will encourage use of the data in as many ways, including helping customers make informed travel decisions and allowing local transport authorities and operators to make stronger evidence-based spending decisions.

## 20. Compliance and enforcement

### **78. What approaches would you like to see the Department for Transport (or its agents) use to monitor compliance and ensure all operators are providing required data digitally? Please explain your response.**

Currently the majority of operators provide route and timetable information in paper format and local transport authorities conduct quality assurance activities. The DfT's proposals mean that the bus operators will be responsible for publishing data via a distributed model and therefore they will be accountable for supplying high quality, accurate data. However, the Combined Authority recognises that the level of digital maturity and technical knowledge in this area varies between operators. To mitigate the impact of this the Combined Authority suggests that DfT need to enable operators to achieve a standardised level of technical competency so they have the capability to meet the DfT's proposals. The DfT suggest that local transport authorities may be in a position to offer regional data publishing bureaus, providing support with data assurance activities. The Combined Authority currently provides this service locally, however appropriate financial support needs to be provided to allow local transport authorities to resource this. As per the DfT proposals, if data is published directly by operators, careful consideration needs to be given to how data quality is checked before being made available on the DfT data portal. High quality, accurate data is critical to the success of these proposals, given that ultimately this data will be collated by third party applications and consumed (and judged) by customers. The end-users of the data, the customers, need to be at the forefront of these proposals, ensuring they have access to timely, high quality, accurate information, which should be the main driver for enforcing compliance. Although DfT have indicated their desire to decouple bus open data from bus service registration, the Combined Authority suggests that there is an opportunity to perform some data quality assurance checks at the point of registration.

### **79. What support processes should be in place to assist operators who are struggling to meet the requirements? Please explain your response.**

The DfT could consider financial support (e.g. grant loans) to help data publishers meet the proposed requirements.

### **80. What enforcement action / sanctions / penalties do you believe may be required to ensure operators do comply with the regulations? Please explain your response.**

The DfT could consider imposing financial penalties on data publishers if data is not provided within an agreed timeframe. Customers need to have confidence in the information published as part of these proposals so they can make informed travel decisions. Without complete compliance to the proposals, this key objective will fail to be met.