



Údarás Náisiúnta Iompair
National Transport Authority

Proposal to Directly Award a Public Bus Service Contract to Bus Éireann in 2019

Submissions Received

November 2018



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To whom it may concern

All buses should be fully accessible, lower floor buses where possible and all infrastructure needs to be accessible

Regards

Joan Carthy
Advocacy Officer
Irish Wheelchair Association
01-

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Irish Wheelchair Association (IWA) Awarded Best Not-for-Profit Company for Quality Management Systems in Ireland at the National Q Mark Awards



To whom it may concern,

For over six years the Immigrant Council of Ireland has coordinated a partnership with public transport companies, Dublin City Council and the National Transport Authority to tackle racism. The project evolved from an initial strategic partnership seeking to address issues of racism and discrimination in public transport to a full scale annual public awareness campaign. The purpose of the partnership is to provide public transport partners with the tools and skills necessary to ensure they are inclusive of diversity within their companies and also in the delivery of their public services. Public transport companies have particular relevance with regard to diversity management and anti-racism in terms of workplace relations, service delivery and occupying a public space.

Bus Éireann took a proactive approach with regard to effective diversity management by joining the partnership in 2014, and have been an active member ever since. Bus Éireann actively participates in the joint annual Transport Against Racism campaign, donating advertising space and promoting the message 'There's no room on board for racism'. Additionally, to achieve the objective of mainstreaming anti-racism and diversity management the company participated in a series of training sessions in 2015 with the aim to develop skills and internal policies and practices needed to facilitate and deal confidently with existing and growing diversity in the workforce, the workplace and more broadly, in Irish society. The company has recently requested a further suite of training on the topic to ensure their approach to effective diversity management is up-to-date and responsive to the current needs of their diverse workforce and clientele.

We are happy to endorse their tender.

Kind regards,
Pippa Woolnough



Pippa Woolnough
Communications and Advocacy Manager

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The ICI is the Country Coordinator for Ireland for the European Web Site on Integration: www.integration.eu

To whom it may concern,

I have read with some unease the recent suggestion by the National Transport Authority (NTA) of the plan to tender out yet more routes currently operated by Bus Éireann. I write in my context as commercial director of Ocean Fm the regional radio station for the north west covering the counties of Donegal Sligo and Leitrim.

We, like Bus Eireann, provide a public service to the population of the north west under license to the Broadcasting Authority of Ireland.

We are a commercial business and yet manage to comply with our public service obligations. It is a balance that can be struck and one which is most certainly in the public interest.

As an organisation that has at its core the obligation to 'listen' to the people of the north west we can categorically tell you the continued degrading and privatisation of public services in the north west from post offices and health facilities is having a detrimental effect to the fabric of our society and threatens ongoing viability of our communities.

We urge The National Transport Authority not to continue headlong down this same path and erode what is the last essential connection the people of rural Ireland have to travel and do business and support retail in our regions.

As a commercial business we fully understand and support the objective to have services paid for and be profitable. However this cannot be the only ethos by which we live and support the communities we serve.

We would suggest that The National Transport Authority desist from further privitisation at this stage and instead engage in a public discussion about the aims and objectives of the people of this region for a transport service of the future. After all, under our public service remit it is a country and not just a company we serve.

Kind Regards
Daniel Browne
Ocean FM

On Sun, 21 Oct 2018 at 11:11, Daniel Browne <[REDACTED]> wrote:

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Kind Regards
Daniel Browne
Ocean FM

Daniel Browne
Commercial Director
Ocean Media



--

Daniel Browne
Commercial Director
Ocean Media



To whom it may concern,
Sea Sessions Surf Music Festival, has a long standing working relationship with Bus Eireann.
This unique relationship has allowed the festival to grow and develop into a national brand.

Each year Bus Eireann has worked with the event to deliver a number of bus routes specially for the festival to ensure we can grow and develop the event nationally.

This is a massive benefit to an event that is located in the north west of rural Ireland, an area grossly underserved by any other transport infrastructure other than that delivered by Bus Eireann.

Sea Sessions as a result has become a national event designated by Failte Ireland as a Major Visitor attraction on the Wild Atlantic Way. There is no doubt in my mind that this could not have been achieved without the support of Bus Eireann.

It is with this successful relationship in mind that I write to outline my concern for the NTA to further privatise elements of the Bus Eireann service.

I urge you to consider the unique developmental role that Bus Eireann plays in a wider context and the importance of the public service element of Bus Eireann which cannot and be made up by private operators who will have no view towards the wider economic needs of the region and supporting events like ours.

Kind Regards
Daniel Browne
Sea Sessions Surf Music

--

Daniel Browne
Sea Sessions Surf Music Festival

[REDACTED]
[REDACTED]
[REDACTED]

Dear Sir or Madam

I saw recently that 10% of Bus Eireann's routes were privatised and I can see the rationale for that in the context of current EU competition policy and national transport standard setting.

I was surprised however to learn that further routes they currently service are going to be up for tender very shortly . That seems a bit precipitate to me.

I have two experiences of the company to report - both positive.

Firstly I did significant business with them as the CEO in the King's Inns across the road from their HQ during my time in charge there from 2013 to 2018. Secondly I am a regular customer of theirs on a personal level especially on the Waterford route which services my holiday home in Tramore.

At a professional level we hosted a number of their fleet launches at the Inns for the company. We were impressed at the sophistication of their organisation and the quality of their new vehicles and indeed the enthusiasm of the whole Bus Eireann team.

Personally I enjoy travelling with Bus Eireann. They provide a first class punctual service and their drivers are invariably courteous & helpful - in my experience .

Frankly they deserve a shot at being allowed to maintain a national transport service.

Regards

Sean Aylward

[REDACTED]
[REDACTED]
[REDACTED]

A Chara,

I understand that the NTA is planning to tender out further routes, currently operated by Bus Éireann.

I would like to make a submission in favour of Bus Éireann and their tender for these routes.

It is my opinion that Bus Éireann are the best company to provide these services

They are a large employer, with approximately 2,700 employees across 18 primary locations in Ireland. They provide a Public Service Obligation bus service in each county and are the leading provider of public transport outside Dublin.

I understand they have undergone a radical restructuring process and have implemented new work practices and efficiencies. They have a new management team and continue to improve their customer service, both in terms of quality and standards.

Within my own constituency of Kildare North, Bus Éireann's Commuter Services offer a sensible and cost-effective alternative to driving into Dublin city to get into work or to college.

Many thanks for accepting my submission and for giving it your kind consideration.

Yours sincerely,



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<http://www.oireachtas.ie/parliament/ga/eolas/beartasriomhphoistanoireachtaisagusseanadh/>

Dear Sir/Madam

The Licensed Vintners Association (LVA) is the representative body for the publicans of Dublin and Bray.

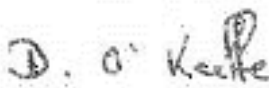
The LVA believes a good public transport network is essential for access to, and from, our members' licensed premises across the capital.

Bus Éireann has been providing services from Kildare, Meath, Wicklow and all of the GDA into Dublin City for over three decades.

Their services are provided to a professional and high standard and are used by both our staff who work in the bar industry, along with our customers who travel into our members' establishments. This public transport service is essential to the employment and commercial sustainability of the Dublin licensed trade.

We note the NTA are looking at tendering out a further 10% of the company's routes. The LVA are supportive of Bus Éireann and the important social and public transport services they provide, and hope they can continue to do so into the future.

Yours faithfully



Donall O'Keeffe
Chief Executive
Licensed Vintners Association
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Independent TD
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26th of October

A Chara,

This letter to you is in reference to the tendering of routes currently operated by Bus Éireann.

They have successfully tendered routes around the country in the past and continue to provide a reliable and efficient service across the country. They also employ 2,700 people and are based throughout the country.

This letter is in support of Bus Éireann continuing to provide the Public Service Obligation bus service.

Kind Regards,

Peter Fitzpatrick TD

Dear Sir/ Madam,

I am emailing in regards to the HSE's partnership with Bus Eireann and the work we have done together to create awareness and understanding around the significant health and social issue that is dementia.

The Dementia: Understand Together campaign is public support, awareness and information campaign led by the HSE, in partnership with the Alzheimer Society of Ireland and Genio. The campaign is one of six key elements of the National Dementia Strategy. It aims to increase awareness and understanding about dementia and inspiring and empowering individuals, communities, business and services to take steps to embrace and include people affected by dementia in Ireland.

In October 2016, the Dementia Understand Together campaign was launched with the support of a coalition of academic, of over 30 partners from business, academic, health and voluntary and community sectors. One of these key partners that came behind the campaign and supported the need to address dementia was Bus Eireann. We have built a strong working partnership with Bus Eireann since this time and their commitment to public awareness and ensuring staff are trained to support a person with dementia and family members is evident.

In December 2016, Bus Eireann worked with us to raise awareness of dementia to those travelling over the Christmas period. We held a joint Christmas choir event in Busaras with the 'Forget me Knots' choir and a team of volunteers to show that we can all play a role in helping to build inclusive and compassionate communities across Ireland to support those living with dementia and their loved ones.

During 2017 and into 2018 Bus Eireann committed to providing training to its staff so they would be aware of those who needed that little bit of extra help and support as they travelled. This training was carried out with all their Training Inspectors and cascaded to Drivers as part of appropriate courses, for example Customer Care and disability awareness programmes, Driver CPC programmes. The intention from Bus Eireann is to make sure that all their drivers are aware over time.

In April 2018, Bus Eireann supported the release of a Travel Tips Factsheet intended to assist people with dementia, their families and carers, who may be planning a weekend away or a holiday break in ensuring that their trip is enjoyable.

This is a snapshot of the positive partnership Bus Eireann has with the HSE's Dementia: Understand Together campaign and the commitment we both have to looking at ways to improve the travel experience for people with dementia and their families into the future.

If you have any queries please don't hesitate to contact me.

Kind regards,

Roisin Guiry

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Bayylcurrane
Clashmore
Co. Waterford**

**Bus Contracts
National Transport Authority
Dún Scéine
Iveagh Court
Harcourt Lane
Dublin
D02WT20**

By Email: 2019buscontracts@nationaltransport.ie

29th October 2018

Re. Submission to the National Transport Authority (NTA) on the Bus Éireann Direct Award Contracts

Dear Sir/ Madam

As Principal of Ballycurrane National School, I am making this submission to the NTA in the context of their recent advertisement of the consultation process regarding their intention to award Bus Éireann another Direct Award Contract.

Every year for the past number of years, the issue of the rural school bus service to our local area and school, is of extreme angst and concern; and is also affecting our enrollment and thus the potential continued viability and operation of our local school for the local rural community.

This issue manifests itself every year when parents are trying to register/ book their childrens' bus tickets. Some parents (particularly those from the Mount Stuart area), when attempting to book the bus service for Ballycurrane online, are being directed to other nearby schools - ie Glenbeg and Aglish - which are closer to towns, and outside of the local rural area which our school services - and notwithstanding the fact that they don't in fact provide a bus service to Aglish and Glenbeg themselves!

Historically, the Mount Stuart area would originally (many decades ago) had its own N.S., and this service was subsequently amalgamated with our school (when the Mount Stuart National School closed) - with Bus Éireann committing and promising that a bus would always service our local rural catchment area.

We are now being led to believe/ have been told, that this arrangement does not exist anymore. However, other schools who are in a similar predicament/ scenario, as well as our local priest, state that this is not true; commitments to other schools are still being honoured!

In addition to this, we also now have the issue of eligible and concessionary tickets to contend with, wherein parents from the Mount Stuart area, who wish to send their children to their Parish School (ie Ballycurrane N.S), can only obtain concessionary tickets. This concerns me no end, as we have been told that when Bus Éireann looks at the viability of a bus route, concessionary tickets do not count!! This situation is also bizarre as we also have an instance where a family already has a child commuting to the school on an eligible ticket, and now that same family is being told that their younger children are only eligible for 'concessionary' tickets. The above-outlined situation and scenarios is having a stressful and negative effect not only on myself and the school Board of Governors, but also on the local rural families.

This is also a continual, annual situation, and provides much uncertainty and undue stress – it does not therefore provide the necessary supportive rural role for which the service was established and operates. Rural public transport plays a critical public service by serving and sustaining rural communities, who would otherwise be severely impacted by the lack of same. In this regard, I really do feel frustrated because we have a wonderful school with hardworking staff, and parents and children who are very proud of it. We have also recently secured funding to build a new purpose-built classrooms and ancillary support buildings to further modernise our school and ensure its continued service to the community. Funds have also been secured for the carpark area, and work is already progressing on this. However, with the uncertainty of the bus all this great work will be of no use. In the event that Bus Éireann continues in the current manner, and is successful, in terms of discriminating against our school and diverting parents and pupils to other schools because they have no other option than do avail of the only choice Bus Éireann are offering them, then it will severely impact our school by reducing our numbers. Taxpayers money and teaching resources etc, spent in upgrading the school will all then be to no avail, and the local community will also lose a vital service and core of the rural area.

I note from the NTA Consultation Paper, that *'The objectives of the Authority in entering into any public bus services contract are to:*

- i. Ensure the provision of high quality and accessible bus services at best value for money to the Exchequer;*
- ii. Enable strong monitoring of, and enforcement of compliance by, the contracted operators with the terms of their contracts;*
- iii. Improve the customer experience of public transport;*
- iv. Ensure public transport integration is not compromised; and*
- v. Be compliant with the Dublin Transport Authority Act 2008, the Public Transport Regulation Act 2009, EC Regulation 1370/2007 and EU procurement requirements.'*

I have also noted that in the relatively recent 10% tendering activity, both competitions for Waterford and the Dublin commuter services attracted high levels of interest and tenders. This fact would tend to indicate that there is indeed competition and interest amongst operators for various public bus service provision.

In addition, and in regard to the above highlighted NTA objectives, I would have to say that the experience that we, as a school community, have had of the rural school bus service provision from Bus Éireann to our local rural area and school, has not been entirely positive, and customer experience in that regard is

poor; as I have also myself, on several occasions tried to follow this matter up with both Bus Eireann themselves, and now am also trying through our local Minister, and through this submission.

In this regard, and from our experience, I would not support the NTA's current proposal to directly award the contract to Bus Eireann, or certainly that part of the contract which is associated with the Rural School public bus service/ programme, and would motivate that this component of the contract should also be set aside for tendering in separate lots. This would also hopefully assist in ensuring much smaller local operators to directly tender for services which they can provide in their local rural area, and which they are currently, in any event, providing on a likely sub-contracting level, to Bus Eireann.

I would also recommend that future public consultations be advised/ advertised directly to either/ and the INTO (Irish National Teacher's Organisation), the IPPM (the Irish Primary Principal's Network), or in fact directly to schools themselves, as it is quite by chance that I was made aware of this public consultation and the ability to make input/ a submission to it and the NTA's proposed tender/ contract award process.

Kevin Gough
(School Principal)

SUBMISSION ON BUS ROUTE TENDERING - BUS EIREANN ROUTES

Outside Dublin

I agree with all the final conclusions (document Bus Eireann 3 p22). The argument for tendering 10% of routes in the short term, while maintaining a direct award with Bus Eireann, is well made.

However, there are a number of issues on which I would like to comment.

Bus Eireann different businesses

The information provided gives 31.1m passengers carried, and an aggregate figure for revenue and compensation. There are three separate types of product, separate businesses effectively, included here, namely provincial city/commuter services; Dublin commuter routes; and stage carriage. From data elsewhere, it seems that provincial city/commuter account for 64% of passenger journeys; Dublin commuter is 23%; and stage carriage is 13%. Stage carriage is 130 routes, many of them only once a week.

It would be very helpful to have a breakdown into these three categories of revenue, cost and compensation. City and commuter buses tend to be well patronised, while many stage carriage routes are not. It is clear that compensation relative to revenue; and compensation per passenger, are much higher for stage carriage than for the other businesses.

Cost of carrying children is the same as cost of carrying adults. It is public policy to provide discounts for schoolchildren, it is not a commercial decision. It may have made sense to give discounts to children commercially at a time that most children were travelling as part of a family. But now the average school child carried is from a family in which the adults do not use the bus, while adult bus users would tend to be people of lower income than bus using children and schoolchildren. Commercial operators, such as City Direct in Galway, have much lower discounts (i.e. higher fares) for children.

In that context, it would be unreasonable to expect adult bus users to subsidise child bus users, by paying a higher fare so that children can travel cheaper. As lower school and child fares are a matter of public policy, then compensation for bus operators is appropriate. This amount should be clearly defined, and included as a revenue subvention, similar to the revenue attributed to Free Pass users.

It is likely that a significant part of the compensation in the city and commuter businesses is directly attributed to child and schoolchild travel (depending on how significant children are in the total numbers carried). In other words, it is not a subvention for provision of unprofitable services.

If revenue was recalculated this way, i.e. including a subvention for the difference between child and adult fares, then the subvention for service operation would be much lower, and it is likely that many core routes would be profitable.

This is an important statement. If routes are profitable, then you could get to a situation where the incumbent is asked to declare routes that are profitable and don't need PSO, and tendering may only be for other routes. Or routes could be profitable for weekday daytime services, but with a high frequency specified as a requirement in evenings and weekends, there could be PSO payments for providing these.

Stage Carriage routes

Observation from journeys on many Stage Carriage routes over the past couple of years indicates that many routes are being operated with very poor loadings, numbers varying from 1 to 5 passengers on a bus at any time. There are, of course, a number of core Stage Carriage services that do much better than that. It begs the question about value for money, resource allocation, even environmental issues. Bus services are at their best in economic, social and environmental benefits when they carry significant numbers of people. If they are virtually empty, they are not making much contribution under any of these categories.

We do have a very effective supplementary rural transport scheme. Perhaps some, perhaps many, of the existing 130 Stage Carriage routes would be better served as part of the rural transport scheme, with a Locallink product, vehicle size and cost base. Note that 38% of the routes have a service less than once a day (mostly once a week), and these account for 3% of departures. At the other end, 29% of Stage Carriage routes account for 73% of departures. Perhaps routes that operate less than once a day could be considered for transfer to Locallink; followed by examining other low frequency routes, those only once a day (16 routes). A major bus company that has large capacity vehicles, and is primarily focused on the large city and commuter markets, is not the best model for very low frequency rural routes.

Dublin Commuter Area

The area served by Dublin Bus includes the Metropolitan Area, and also some towns outside the Metropolitan Area. This is for historic reasons, and urban growth makes provision of an urban service to outlying towns very slow and inconvenient. Fingal County Council regards Swords and Donabate as Metropolitan Area, but not Lusk, Rush, Skerries or Balbriggan. They are considered "rural hinterland". Similarly, Blessington, Co. Wicklow could not be regarded as Metropolitan. Towns like Dunboyne, Maynooth and Rathcoole are almost an extension of the city, with only short rural areas in between. North Wicklow, around Bray, is another example, but that is a micro network, and not relevant to our discussion, as it is mainly in the tendered network for Go Ahead.

There is a strong case for moving the existing Dublin Bus routes 33 and 65 to a different form of service, more appropriate for towns of their distance from the city. There is also a strong case for linking them more closely with Bus Eireann routes 101 and 132 that parallel them to some extent. It should be noted that changes to operating area has already once been made in this decade, when Dublin Bus withdrew from Kilcock, leaving it to be served by Bus Eireann.

In the context of route tendering, and of specifying appropriate product and service requirements, it is worth reviewing the scope of city type services and the area best covered by services not carrying local passengers within the city.

The Dublin commuter market is a very important bus network, supporting many people who in recent decades needed to move out of Dublin due to housing shortage. It is the one part of Bus Eireann business where tendering has resulted in a new operator; and it is the business where additional route tendering is planned. This is the correct way to go with this market. But it does raise questions about the definition and boundaries, both in terms of which state operator has the licence, and of product type to serve the city centre. A few observations on this:

- As stated above, some of the boundaries are historic, not appropriate for today, and need to be reviewed
- There is a very different view being taken by NTA on development of each. The Bus Eireann served routes have had huge and welcome increases in frequency in recent years, while the Dublin Bus served routes are planned to lose service to city centre under Bus Connects. There is no logic or rationale to this different approach.
- Question arises about which state company can tender for which. Perhaps, for example, if Bus Eireann route 103 went to tender, it might be most cost effectively operated by Dublin Bus, using Harristown as a base. Should this be allowed under the tendering process?
- We need to separate the service provider from the product. There is currently an absolute link between service provider and whether or not the bus route acts as a city service in addition to long distance commuters. This needs to change.

Geography and structure

The organisation Bus Eireann has many different businesses, and a huge geographic spread. Its origins go back to the rail companies providing bus services in the 1920s. For many years, there was value in a national network for seamless point-to-point journeys. There was also value in organisational expertise, and efficiencies of scale. However, these factors are not so important now. There is a huge amount of bus expertise, and efficiencies can be achieved through outsourcing, or sharing of specialised services such as IT, procurement, accounting.

Looking at the geography, over 90% of Bus Eireann PSO passenger numbers are focused on the 5 major cities (this includes a significant part of routes defined as Stage Carriage). There is virtually no Bus Eireann PSO presence in 6 counties of central and southern Leinster.

Question is, is Bus Eireann the right structure to deliver PSO services over a range of diverse cities and towns? Or would more localised businesses be better? Would state owned bus companies focused on each of the major cities deliver a better and more cost effective service? Could performance measurement over a number of companies set competition between them, as a supplementary incentive to simply reaching targets?

It is worth noting that in other countries, bus services in cities tend to be focused on that city, rather than a state owned company spanning so many areas. Cork, Limerick and Galway are all sufficiently large to sustain a bus company that would be equivalent in size to many successful municipality owned companies in UK, for example.

There would be significant advantages in this. Firstly, there is a small, lean management, more knowledgeable of and focused on local issues; customer local loyalty and brand identification. Secondly, some form of inter-company competitive pressures could incentivise all companies to better performance. This could be an alternative to the route tendering process in the short/medium term, with the route tendering focused on parts of the network remaining with Bus Eireann. Many back-up services could be centralised in Bus Eireann, or outsourced elsewhere.

Proposal:

1. Create three bus companies based in Cork, Limerick and Galway. Cork would serve Cork; Limerick serve Limerick, Kerry and south Clare; Galway serve Connacht, north Clare and Athlone. Bus Eireann would continue to serve Leinster, Ulster three counties, and Waterford. All companies would serve some parts of Tipperary.
2. Bus Eireann would continue with school transport service management, and all commercial Expressway services to/from Dublin. The new regional companies could operate commercial services including Expressway between and outside their regions, but not to Dublin
3. Regional bus companies would ideally be state owned, outside the CIE group. Assets such as depots and bus stations should ideally be separately owned, either by CIE group, or by NTA. Even if not possible to achieve these, there is significant merit in regional rather than national bus companies.

Operational performance

It is encouraging to see the revised measure of reliability and punctuality, and also that it is intended to increase the target from 95% to 98%. This is more in line with industry norms, and presents a genuine challenge that should encourage better management of the operation in order to deliver better service.

There is no doubt that general interest is best served by route tendering, by bringing a competitive aspect into cost, service provision, and market responsiveness.

The lack of access to CIE bus depots for alternative operators is a disappointment. It is worth noting the situation with Aran Island air service, where the incumbent owns the airstrip, and this is making competitive tenders very difficult. Department is apparently looking at purchasing the airstrip. Some similar options need to be considered for Bus Eireann services, in advance of 2024, with legislation if necessary, if we are to have a continued option of real competition for services.

Intermediate times

One observation from using Bus Eireann services is that journey times, including intermediate times, are very poorly planned in timetables. Some times are impossible to achieve. Some are too generous, and are not adhered to. There are even some where the bus will be late at subsequent towns if it does not leave others before the indicated timetable time.

Route 101 used to be a case in point. Changes were made in recent times, and intermediate times are now far more realistic. A similar process is required on many other Bus Eireann routes. Targets for punctuality and reliability should be encouraging this.

Comments:

- Agreed best for NTA to take revenue risk
- Agreed use route bundles, based on number of buses required, rather than number of routes. Waterford city was probably at the lower end of bundle size, probably ideal to have them a bit larger
- Agreed best, in theory, for NTA to set requirements on routes, timetables, fares, vehicles and customer information
- NTA has worked extremely well with Bus Eireann to improve timetables and to provide consistent products on many routes. The city and county reviews have been very successful.
- Agreed performance based penalties and incentives for exceeding targets, as long as targets are sufficiently challenging.
- Proposed that new regional bus companies in Cork, Limerick and Connacht be established.

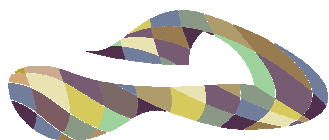
Dublin commuter network changes:

Suggested changes are due to the fact that, with extended suburbanisation and heavier traffic, the journey times for Dublin Bus routes 33 and 65 are too long, and these routes are not suitable for city type services that carry local traffic, even within the last km into city centre. Some change is required, as users from the areas served by this routes need bus access to city centre. This is best done with some integration with parallel provincial services, routes 101 and 132. It is notable that both of these routes are on the Bus Eireann list for potential tendering.

It is suggested that routes BE 101 and Dublin Bus 33 be combined for a tender (with probably 101x and 33x); and that route 33a is cancelled, with Go Ahead taking route 84 instead. In this scenario for 101 and 33, both Dublin Bus and Bus Eireann should be allowed tender, either together or separately.

Bob Laird FCILT

29 October 2018



Moyross Residents Forum

Moyross Community Enterprise Centre
Moyross, Limerick
Tel: 061 326057 // Mobile [REDACTED]
Email: moyresidents@moyross.ie
Facebook: Moyross Residents Forum
Twitter: Moyross Res Forum

26th October 2018

Bus Contracts
National Transport Authority
Dún Scéine, Iveagh Court
Harcourt Lane
Dublin D02 WT20

Submission to Support Bus Eireann

Moyross Resident Forum is a consultative group representing the community of Moyross. We have nominated residents from each of the 12 parks in Moyross along with representatives from community & statutory groups who provide a service in our community. Bus Eireann is a highly valued member of our Forum.

Moyross Residents Forum fully supports Bus Eireann in tendering to the National Transport Authority (NTA).

We believe Bus Eireann through the dedication of their staff is the best company to provide these services.

Moyross Residents Forum very much appreciates the relationship we have built up with Bus Eireann over the years and their participation as a member of Moyross Residents Forum and Community groups within Moyross. We highly values the personal commitment given by all the representatives from Bus Eireann.

With the new management team on board, and through the dedication of their staff they continue to improve and provide a very high standard and quality services to our community. Open dialogue and communication with the Forum on the service and routes is a vital part of our partnership to enable us to share information with our residents in the community.

We wish Bus Eireann every success in their tender.

Kind regards

Tracy McElligott
Estate Management Development Worker
Moyross Residents Forum
Moyross Community Enterprise Centre
Limerick



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Chamber**
Advancing business together

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Bus Contracts Consultation
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin
D02 WT20

30 October 2018

**Re: Consultations on NTA proposals to directly award contracts from December 2019
for Public Bus Services**

To Whom It Concerns,

Cork Chamber is the leading business organisation in Cork proactively working to identify and progress developments that are facilitative of regional economic growth into the future. Cork Chamber represents an employer base of close to 1,200 businesses and over 100,000 employees across the region. In representing the voice of business, I take this opportunity to emphasise the principal requirement for the provision of a smart, integrated, accessible, affordable and clean technology public bus service network and infrastructure at local, regional, and national level.

The demand for an effective public transport service has never been greater. In September 2018, Bus Éireann confirmed that passenger numbers on the Cork city network have increased by 101,000, hiring 66 new drivers in August. In February 2018, Bus Éireann extended the city zone fares in Cork to further commuter locations, increasing the affordability of bus transport. We commend the work of the Bus Éireann to date in driving the upward trend in passengers numbers, and service efficiencies. Such statistics are encouraging, with the underpinning measures that address affordability essential. These and future measures need national commitment and support from the NTA as the growing usage numbers prove the affordability trigger, as well as the latent potential.

I, the undersigned, being a duly qualified Company Director, in accordance with Section 151 of the Companies Act 2014 is available on application from the Company's Registered Office.

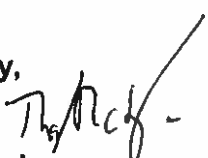
Cork Chamber is a registered brand of Cork Chamber of Commerce, a Company Limited by Guarantee. Registered in Ireland No: 13918 VAT No: 0005247M

Consequently, with a growing population base, the opportunity is now to strengthen the service foundations and further drive these usage numbers. In the Cork City and region alone, we expect a population increase of approximately 300,000 over the next 30 years with an overall national population increase expected to be over 1 million. With this there are challenges, but there are also opportunities.

To seize the opportunities, it is essential that we have a public bus service that is data driven, responsive and adaptable to demand. We need a public transport network that is cohesive, with consistent and uniform ticketing and payment structures across services and service providers, and with easily accessible and understandable transport network information. It is essential that the service is affordable and reliable. We need greater integration of smart technologies with the opportunity of real time information panels to drive greater usage. We need immediate investment in cleaner public bus fleet technologies and fuels to meet our local and national environment commitments, emission reduction targets and due diligence. We need greater and more rapid investment in critical network infrastructure such as bus corridors, bus shelter infrastructure, interchange facilities, and mobile information apps. For example, in Cork where we do have real time information panels, the information displayed is not reliable and represents an enormous opportunity lost for both the service and customer. It is essential that national investment is focused on developing the public bus service infrastructure in a way that engenders confidence in the service and increases the reliability on the service. These are the essentials in driving a modal shift for commuters. Both the commuters and the employing businesses require this level of confidence and service reliability. Finally, we highlight the need for public bus services to service a geographical spread of locations to ensure accessibility and potential growth of a broad landscape of social economic areas, with service provision not solely focused on profitability. It is essential that our public bus service remains equitable and inclusive.

In conclusion, as a decision is taken on the privatisation of bus routes, we need such factors as service integration, uniformity, accessibility, affordability, dependability, fuel and fleet technology to be taken into consideration. Cork Chamber is fully committed and supportive to increased service and network efficiencies for local, regional and national bus routes.

Yours Sincerely,



Thomas Mc Hugh
Director of Public Affairs

Re: NTA Public Consultation on proposals to directly award contracts for public bus services from December 2021.

As a member of Kildare Co Council, I am of the opinion that the proposal to remove a further 10% of services from the Bus Éireann contract in 2021 is mistaken and should not proceed.

10% of the routes up until recently operated by Bus Éireann have already been removed from the Bus Éireann contract, including the 120, 120C, 123, 124, 126 and 130. The new NTA proposal to remove a further 10% of services from the Bus Éireann contract from 2021, including the 101, 103, 105, 132, 133 would further undermine the capacity of Bus Éireann to provide an integrated public transport service that meets the needs of all sections of our communities.

These routes, both the first 10% that were removed from the Bus Éireann contract and now the second 10%, are high-volume commuter routes. As such, they not only provide essential commuter services – which need to be increased to reduce commuter congestion and reduce carbon emissions – but also provide revenue to cross-subsidise low-volume and orbital routes. These latter routes are essential as part of an integrated public transport service.

This kind of cross-subsidy is only possible within a single operator entity, which is what Bus Éireann is.

Private bus contractors, be they local / Irish or multinational, are in business to make profits. For example, according to the press statement from GoAhead of 7 Sept 2017, the company made £91 million profit from bus operations in 2016; and £89 million was given to shareholders. The CEO declared: “Internationally, we will be working towards our target of generating 15% to 20% of Group profit from operations outside the UK within five years.” The same principle applies to any other private operator: the objective is to make a profit for the owners or shareholders.

Private operators are therefore not going to cross-subsidise one another and are only going to seriously bid for contracts that maximise profits – primarily the high-volume routes. GoAhead is not going to give part of its revenues to Kavanaghs or Kearns; nor vice versa. This approach conflicts with the need for an integrated service, the primary purpose of which is to provide high-quality, frequent and linked-up public transport.

The removal of more services from the Bus Éireann contract would progressively reduce its capacity to cross-subsidise routes and thereby provide a high quality, integrated public transport service. Such a service needs to meet the requirements of peak-time commuters; and it needs to provide orbital services and services to communities with small populations and low passenger volumes - which do not yield sufficient revenues to be self-financing and thus require cross-subsidy.

This is increasingly necessary to provide an alternative to high-volume car use and to reduce road congestion and carbon emissions.

Government predictions show population growth requiring 500,000 new homes by 2040. If the thousands of new households in Kildare, Meath, Louth and Wicklow use cars to get to work, the roads will be completely jammed and carbon emissions will rise.

So we need a single public entity providing an integrated public transport service – not a multiplicity of competing private operators. Bus Éireann is best suited to be that public entity and therefore should not have any more routes removed from its contract.

Ends.

Councillor Brendan Young. Kildare Co. Council.

30 October 2018.



Ms. Anne Graham
Chief Executive Officer
National Transport Authority
Dun Sceine
Harcourt Lane
Dublin 2, DO2 WT20

Córas Iompair Éireann

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30 October 2018

Consultation on proposals to directly award contracts for public bus services from December 2019

Dear Anne,

Thank you for your letter of 5th October inviting CIÉ to respond to the current NTA consultation on proposals to directly award new contracts for public bus services from December 2019

- (1) Within the Dublin region to Dublin Bus, and
- (2) Outside the Dublin region to Bus Éireann

CIÉ appreciates the opportunity to respond to the consultation in relation to item 2 above – the new Direct Award contract outside the Dublin region to Bus Éireann. CIÉ very much welcomes and supports the NTA decision for the new direct award contract to Bus Éireann as set out in the consultation paper. We believe that the decision builds on the existing strengths and experience of Bus Éireann to deliver quality bus services outside the Dublin region in an environment which is dynamic, a network that is evolving and an operating environment that is complex and challenging.

At the outset CIÉ acknowledges the NTA's statutory remit and indeed the complexity of the task the Authority is faced with in responding to changing customer travel needs and experiences and balancing this with a requirement to ensure value for money, quality service delivery and a viable business model for bus operators.

The enabling legislation for CIÉ¹ and its Subsidiary Companies² imposes certain statutory duties on CIÉ related to public transport. The enabling legislation for the NTA³ establishes it as the competent authority for the purpose of defining public service obligation requirements and awarding contracts whether directly or otherwise.

In essence the Board's social role is now contained in the contracts made between the NTA and the subsidiary companies, which are designed to ensure that the obligations imposed on CIE under Section 7 of the Transport Act are adhered to.

Bus transport is a critically important mode of travel for many people in Ireland and for its role in facilitating modal shift from private car usage, in line with national policy. Bus Éireann is an important service provider in the public transport market outside the Dublin region. It provides Expressway inter-urban services, city and town bus services, outer commuter services and school services throughout the country, in addition to coach and bus hire services. In 2017 Bus Éireann operated 182 million vehicle km enabling c.78 million passenger journeys, including sub contracted services.

¹ S7 Transport Act 1950; S 7 Transport Act 1858

² S 7 Transport Act 1986 (Re-organisation of CIÉ Act)

³ S52 Transport Act 2008 (Dublin Transport Authority Act)

CIÉ recognises that both competitiveness and service quality are critical to future growth and success. In this respect, we welcome that it has been acknowledged by the NTA that Bus Éireann's business transformation, which commenced over a year ago, has now helped to achieve competitiveness on price. CIÉ fully appreciates that Bus Éireann's customer satisfaction rating is also of paramount importance and we can assure the NTA that we will continue to play a strong supporting role to Bus Éireann in pursuing policies to drive the sustainable improvement of service reliability and punctuality to deliver higher customer satisfaction ratings.

CIÉ recognises and appreciates the complexity of the challenges facing the NTA with regard to overseeing bus service provision outside the Dublin region. With this in mind and specifically the NTA proposal to consider a competitive tendering of 10% of the bus market outside the Dublin region by 2021, CIÉ has identified a number of strategic points that we consider are important for the NTA to include in its future considerations and deliberations.

It is clear from a review of the international experience that choosing the right model or combination of models for operating bus services outside key metropolitan areas is not a one-size-fits-all panacea and there are differing approaches adopted with varying results reported.

It is noted that in jurisdictions where mixed contracting models exists (combination of direct award and competitive tender) cost benchmarking between the internal operator and operator on competitively awarded parts of the network is often difficult and contentious, and is not systematically undertaken. While various models exist and have delivered differing results, case study evidence suggests that long-term planning, committed funding and incentivisation are important elements to achieve cost efficiency in the provision of bus services. It is essential that whatever approach is adopted that it is based on a thorough market needs assessment.

Given that competitive tendering is a relatively recent occurrence in relation to public bus service provision outside the Dublin region, there will inevitably be a lead-in time before a credible benchmark of this method of providing public bus services can be made. It will be important at that stage that a robust cost benefit analysis of the impacts of competitive tendering is undertaken. CIÉ would suggest that such an evaluation will need to assess the likely significant costs of contracting versus the benefits potentially arising over time. It will be important that there is full transparency of the financial and operating performance data associated with competitive tendering, including the method of data collection, to ensure an accurate assessment and to enable a robust benchmark with other methods including direct award. Bus Éireann is subject to the Code of Practice for the Governance of State Bodies, this provides an assurance on the reasonableness of disclosures related to the financial performance of the Direct Award contract.

It is CIÉ's view that specifying the potential routes that may be open to a competitive tender, as set out in the consultation report, may be premature at this stage in advance of a future benchmarking exercise to determine the associated costs and benefits of competitive tendering, when the opportunity presents. As outlined above, CIÉ welcomes the recognition of the significant progress that Bus Éireann has achieved in implementing cost saving measures contained within the consultation paper. CIÉ also agrees with the NTA's view that reliability, punctuality and frequency are key factors in the provision of a good quality service. Given the significant transformation programme that Bus Éireann has undertaken the impact of transformation on service performance in the short term is acknowledged, we are pleased to note the improvement in Bus Éireann's performance in this regard in recent times.

The consultation paper does not address where revenue risk is to be allocated under the Direct Award. In this regard CIÉ view is that the arrangement should be such as to avoid duplication as this is costly and inefficient. This issue will require a thorough assessment as a change from the existing approach will inevitably give rise to some changes to the way in which bus services are financed and delivered. Issues which CIÉ consider require careful examination include, revenue risk, incentivisation to improve service quality, and revenue control and protection. A gross cost approach inevitably reduces the direct incentive on the service provider to protect the revenue. In addition, careful consideration is required of whether removing the operator's reliance on fare revenue is more appropriate for the Exchequer in the long run.

CIÉ acknowledges that significant challenges lie ahead on the shared aim of achieving a sustainable public transport system outside the Dublin region. Congestion is rising to almost critical levels in the peak periods across the network, and particularly within cities and their interfaces. CIÉ welcomes ongoing bus priority initiatives and measures aimed at improving the operating environment and making bus services more attractive to users and potential users. The proposed restructuring of the bus services network in Cork and Galway is a challenge and opportunity for all stakeholders to improve the customer experience and integrate the public transport network to better serve the travelling public.

CIÉ is fully committed to meeting the changing travel needs of a growing population with considerably higher customer expectations. As an established operator, Bus Éireann has the requisite and proven experience to respond to these changing needs. Bus Éireann also benefits from important economies of scale as an established network wide operator which allows for a fully integrated approach to transport planning.

CIÉ in conjunction with Bus Éireann will continue to strive to provide enhanced customer experiences with delivery at a competitive cost base in line with our statutory remit and we look forward to continued ongoing positive collaboration with the NTA in the delivery of bus services outside the Dublin region.

Yours sincerely,



Ronan Gill
Acting Chief Operations Officer
CIÉ



October 30th 2018

To whom it concerns,

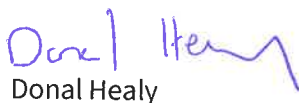
Bus Eireann have been a loyal and critically important transport partner of Ireland West Airport over the past eight years since they introduced direct services to and from the airport.

During that period the airport has grown passenger numbers by 23% to what will be a record year in 2018 of 775,000 passengers to use the airport. As a regional airport the provision of an effective public transport network that works in line with the airports flight schedule and provides an adequate level of service to towns in the region is critically important particularly for overseas tourists visiting the West of Ireland and is often a defining factor in choosing whether or not to visit the West of Ireland from overseas. We believe that Bus Eireann have a proven track record in providing a year round, quality service to the airport.

Bus Eireann have continued to operate 'year round' services connecting the airport with towns and cities in the region which further enhances the airports profile in the international market place. We strongly feel as an airport that Bus Eireann is the most suitable operator for services to and from the airport from a frequency perspective and the year sound service offering they provide.

We equally feel there is sufficient opportunity to further enhance the bus network from the airport providing greater levels of service and also enhanced connectivity and frequency to align with the airports growing flight schedule.

Kind Regards


Donal Healy

Head of Marketing, Communications and Aviation business development

Ireland West Airport Knock, Charlestown, County Mayo, F12 P8P9, Ireland.

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Directors: Arthur French – Chairperson, Joseph Kennedy – Honorary President (UK), Brian O'Dwyer – International Chairperson (USA), Archbishop Michael Neary, Fr Richard Gibbons, Peter Hynes, Laurence Power, Joseph Gilmore, Timothy McDermott (UK), Patrick Gallagher, Sean Mulryan, Bryana Hindle-Jennings – Company Secretary

Registered Number: 78973 VAT Number: IE 2218185V

Ireland West Airport Knock is a trading name of Connaught Airport Development Company Limited.

Fianna Fáil Submission on NTA proposals regarding Operation of PSO bus routes

Introduction

Fianna Fáil recognises the immense value of our public transport network. Public transport creates healthier, happier communities by making it easier to get from A to B for work, leisure, or shopping, and reduces congestion and pollution in our living environments. In this regard, public transport is an important public service and one which must be protected and enhanced by the government.

It was for these reasons that Fianna Fáil, throughout our time in government, invested in Ireland's public transport network. It was Fianna Fáil that established Ireland's national public transport provider, Córas Iompair Éireann, in 1944 in order to improve public transport services in Ireland. Following this, Fianna Fáil completed a number of important projects, such as the construction of Bus Áras, which provided a vital hub for Ireland's burgeoning transport network.

More recently, Fianna Fáil has made other important strides to improve the service quality and accessibility of our transport system, including the introduction of the Free Travel Scheme in 1967 and the delivery of the Luas system in 2004. Throughout our history, we have recognised the vital role the state must play in the delivery of quality public transport services.

Overview of existent PSO contracts

As it stands, two state operators, Bus Éireann and Dublin Bus, deliver the majority of Ireland's Public Service Obligation routes. This is set out by the most recent contracts (which ran from the period of December 2014 to December 2019) for the delivery of bus services in the Dublin Area and the rest of Ireland, which stipulate that Dublin Bus will receive a direct award contract for 90% of routes within the Dublin Area and that Bus Éireann will receive the same for routes outside of Dublin. The remaining 10% of both contracts have been put out to competitive tender.

In the case of the Dublin area, Go-Ahead, a private transport operator won and was awarded the contract to operate about 10% of routes in the Dublin area. The operation of these routes

is being transferred on a phased basis, beginning in Autumn 2018 and concluding in early 2019.

A similar tendering process for PSO routes outside of Dublin saw two tenders being put out for routes in Waterford city and on commuter services from Kildare to Dublin. The latter tender resulted in the award of a contract to Go Ahead Dublin, which is due to commence in early 2019.

It is within the gift of the NTA to place further portions of these contracts out for competitive tender, which would essentially mean further privatisation of Ireland's bus network.

This submission relates to the NTA's proposals regarding the renewal of each of these contracts, which will take place in December 2019. Both proposals leave room for further privatisation. In the case of the Dublin area, the proposal is to continue to directly award the contract to Dublin Bus for the operation of "a substantial proportion of the Public Service Obligation bus services in Dublin". The anticipated implementation of the Bus Connects plan may, however, change this contract and the NTA reserves the right to competitively tender out more routes following this.

In the case of the contract for outside of Dublin, the NTA proposes tendering out a further 10% of routes.

Potential Advantages and Disadvantages of Privatisation

There are numerous potential advantages and disadvantages associated with privatising public transport provision.

Chief among the advantages of privatisation is the competition that it introduces. In short, by introducing an element of competitiveness, privatisation can increase overall service quality and reduce the costs borne by the state.

Proponents of privatisation in the United Kingdom, for example, have highlighted the introduction of more comfortable trains, better timetables and more responsiveness to passenger needs. Private industry may introduce service improvements, such as charging points on board, that then become standard across the transport sector.

At the same time, however, there are disadvantages associated with privatisation. First, subsidy levels do not always decrease. Following the privatisation of British Rail, the state subsidy to

the network rose from £1 billion in the late 1980s to a high of over £6 billion in 2006-2007. The economics researcher Paul Starr has highlighted how a private company can be equally, if not more, incentivised to lobby for increased state spending and can thus drive up subsidy levels. This may not be to the benefit of the wider public.

Second, service levels will not always increase. In the United Kingdom, there have been considerable increases in fare prices along popular routes, harming the core objectives of creating accessible public transport for all. Privatisation can harm working conditions for transport workers. This can be both intrinsically harmful and result in negative impacts on customers' experience.

Furthermore, in many cases where a service is economically non-viable but socially necessary, private transport operators can simply fail to deliver, meaning that the state must step in. This was very recently the case on the east coast mainline in the UK, after operators Virgin and Stagecoach could no longer meet the promised payments in the £3.3bn contract.

Fianna Fáil's view

For the reasons outlined above, Fianna Fáil believes that prudence is needed with regard to privatisation. Given that private operators have only started operating PSO routes in the last year, it is simply too early for the impacts of privatisation to be ascertained.

We believe that there must be a trial period and a full evaluation of the impacts of privatisation on existent services, before further competitive tenders are undertaken. Given the huge importance of Ireland's bus networks, we believe that this is a highly necessary check and balance measure. To this end, we have introduced a bill in the Houses of the Oireachtas requiring that, prior to any further privatisation being undertaken, a minimum of five years to elapse following the award of the existent contracts to private operators and that a full review of the impacts of this privatisation be undertaken.

PROPOSAL TO DIRECTLY AWARD A PUBLIC SERVICE CONTRACT TO BUS ÉIREANN IN 2019 - PUBLIC CONSULTATION

**Bus Éireann submission
October 2018**



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FOREWORD

Bus Éireann welcomes the opportunity to present the following submission in response to the proposal to directly award public bus services from December 2019.

We welcome acknowledgement by the NTA that the recent business transformation has helped to make the provision of services by Bus Éireann more cost competitive and this submission will detail the value we will bring to the State for any future award of services.

We are now structured to deliver excellent standards of service quality and our relentless focus on meeting the needs of the customer to deliver a reliable and punctual service has never been stronger.

The proposal to tender up to 10% of services in the GDA by 2021, potentially for the routes identified in the consultation should be further considered and framed in the final analysis only by the advantage to the state and customers when the decision is made. From Bus Éireann's perspective, we would like to draw the Authority's attention in this submission to the service results we are already achieving and will continue to deliver even more improvements.

The proposal to award services under a Gross Cost contract will require more dialogue and consideration with the Authority but Bus Éireann will engage positively with the NTA in this regard.

Bus Éireann have delivered over the past ten years for communities throughout Ireland and our passionately committed staff now look forward with renewed energy, focus and capability to deliver on our promise of providing outstanding service for another Direct Award from December 2019.



Stephen Kent

Chief Executive Officer

Appraisal of Social and Economic Impact of Bus Éireann Direct Award PSO service



1. Very positive customer and financial value delivered by the Direct Award approach since 2009.

- Passenger journeys in 2019 will be 11% above 2009 levels, and 27% above the downturn levels of 2011.
- Revenue per KM in 2019 will be 20% ahead of 2009 levels, which includes fares reductions from Leap card roll out in recent years.
- Cost per KM predicted to be only 7% ahead of 2009 levels as a result of the Transformation Programme. This includes significant growth in cities and towns, which carries a higher cost per km.
- Subvention per KM decline of 4% below 2009 levels, delivering greater value for money to the State.

2. Significant level of service enhancements undertaken – driving modal shift in the cities outside the GDA.

- 369 Operator Variation Notices (OVN's) i.e. timetable updates, between 2013 and 2018.
- LEAP rolled out nationwide in 2018, with new fare structures offering increased value to customers.

3. Strong partnership approach developed providing greater value to the State.

- Strengthened focus on customers – on the basis of collaborative projects for punctuality and reliability improvements, joint marketing programmes, simplified fare structure, new fleet approach and customer care service developments.
- Local input and collaboration for stakeholder alignment to drive public transport usage.
- This has delivered Customer Satisfaction scores of up to 89% in 2018, measured independently.

4. Continuous focus on work practice flexibility and cost efficiency to ensure service delivery is competitive.

- Transformation Programme 2017-2019 is unique in scale and scope in the public sector (64 work practice changes) – delivering flexibility and cost savings to be utilised for service enhancements and fares reductions to the customer.

5. Significant body of evidence which shows Bus Éireann is as efficient and effective as its international peers.

- Comparisons against other operators in the UK and Europe are favourable. This is a fundamental requirement of EU regulation.

1 - PERFORMANCE OF BUS ÉIREANN UNDER DIRECT AWARD CONTRACT 2009 TO 2019



1.1 - Overall Contract Performance – Summary

Bus Éireann's performance in relation to the provision of services under direct award PSC (DAC) over the transition phase has been very positive, as indicated by:

- Growth in customer journeys of 11% since 2009, close to Celtic Tiger levels, and 27% above levels in the economic downturn.
- PSO subvention only 9% up on 2009 levels.

Very positive outcomes in terms of cost, revenue and PSO subvention per km over the EU transition phase since 2009:

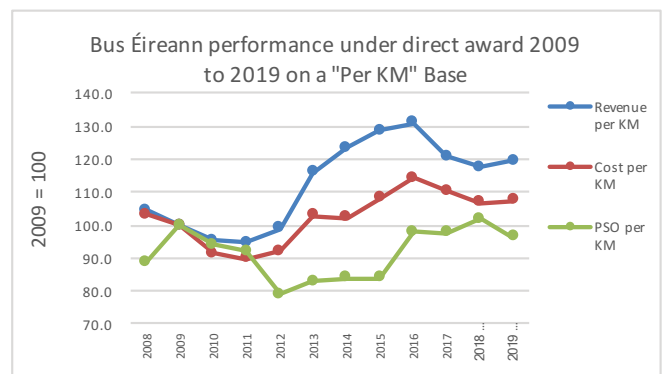
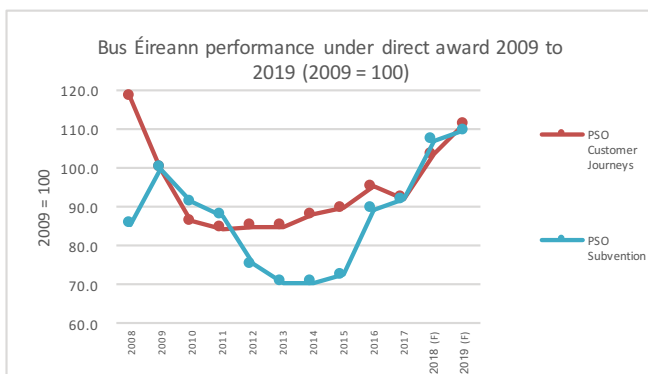
- Revenue per km increase of 20% since 2009. Drop since 2016 reflects fares reductions via Leapcard and fares simplification.
- Cost per km up 7% versus 2009. Drop since 2016 reflects impact of the Transformation Programme.
- Drop of 4% in PSO per km since 2009 reflects the additional value for money to the State.

The main focus of effort in terms of network development has been on city services

- This is where the best per km performance improvements can be seen. NTA and BÉ have developed increased evening services and town services in recent years.

The per km performance has also been supported by collaborative projects:

- Service developments increasing the network capacity without impacting on resources (e.g. greater use of double deck buses and coaches)
- Simplification of the fare structure.
- Best use of local knowledge and community connections – Leveraging local knowledge to support and facilitate network development expertise in the NTA.



Note: 2017 contract performance impacted by the effects of 22 days strike. 2017 additional PSO payments applied retrospectively to relevant years. Forecasted revenue and cost reflect additional services planned with NTA.

1.2 – KPIs and Service Performance Targets

In general, Bus Éireann has met its contractual performance targets and delivered considerable improvements in relation to efficiencies and attractiveness. In terms of the two timescales:

- 2009/2014: NTA's documentation from 2013 highlights that BÉ made 99.5% of its KPIs under contract. Improvement underway prior to the adoption of public service contracts in December 2009. Deloitte Report (2009) for the DTTAS found that Bus Éireann was as efficient as its European peers with one of the lowest subsidies in Europe, notwithstanding the improvements made since.
- 2014 to date: Performance reports since 2014 point to a high level of KPI compliance notwithstanding specific issues in relation to:
 - Initial resistance to work practice changes in relation to the Transformation Programme.
 - The transition to the NTAs DMS system and the technical challenges that emerged.

- The changed approach to managing punctuality from all points on a route across the mix of PT service types in the contract (City, town, GDA Commuter, Other Commuter and Stage Carriage).
- Constraints in steady state investment in certain areas of the network and network infrastructure (Stations, Bus Stops, Fleet).

Bus Éireann is working closely with the NTA to minimise or eliminate any gaps in service quality provision through the following:

- Organisational restructuring as a result of the transformation programme.
- Enhanced performance measurement.
- Appropriate and timely investment in 2018 in relation to services and facilities.
- Collaboration with PT stakeholders in relation to enhanced bus priority measures.

| "Brilliant Basics" | Initiatives in place | RAG Status |
|---------------------------------|---|--|
| Punctuality | <ul style="list-style-type: none"> • Punctuality Improvement Programme (PIP) 2018/2019 • Services Development Programme 2018/2019 • Enhanced planning team. | <ul style="list-style-type: none"> • Phase One changes delivering improvements. |
| Reliability | <ul style="list-style-type: none"> • DMS Action Plan • Enhanced AVL control centres | <ul style="list-style-type: none"> • On track. |
| Cost Efficiencies | <ul style="list-style-type: none"> • Route and Duty Optimisation 2017/2019. • Organisational restructuring programme. • Telematics Programme 2018/2019 | <ul style="list-style-type: none"> • Optimisation targets achieved. • Restructuring underway. • Telematics pilot planned for Q4 2018. |
| Cleanliness | <ul style="list-style-type: none"> • Stations/Facilities Investment Programme 2018/2019 • Fleet Investment Programme 2018/2019 • Additional cleaning programme for out based vehicles (2018) | <ul style="list-style-type: none"> • Stations Plan initiated. • Fleet plans 2019 agreed in principle. • Cleaning programme Q4 2018. |
| Customer Service Quality | <ul style="list-style-type: none"> • Customer Service Training Programme • Technology Innovation programme • Bus Stop Investment Programme | <ul style="list-style-type: none"> • Pilot in Waterford Q3. • Technology and Bus stop projects on track. |

1 - PERFORMANCE OF BUS ÉIREANN UNDER DIRECT AWARD CONTRACT 2009 TO 2019



1.3 Impact on the Customer and the Community

Bus Éireann has worked closely with the NTA to improve the customer service offering in the last nine years :

- Improvement in the network service offering.
- Investment in higher capacity vehicles that are environmentally friendly.
- Investment in ticketing technology.
- Investment in monitoring technology.

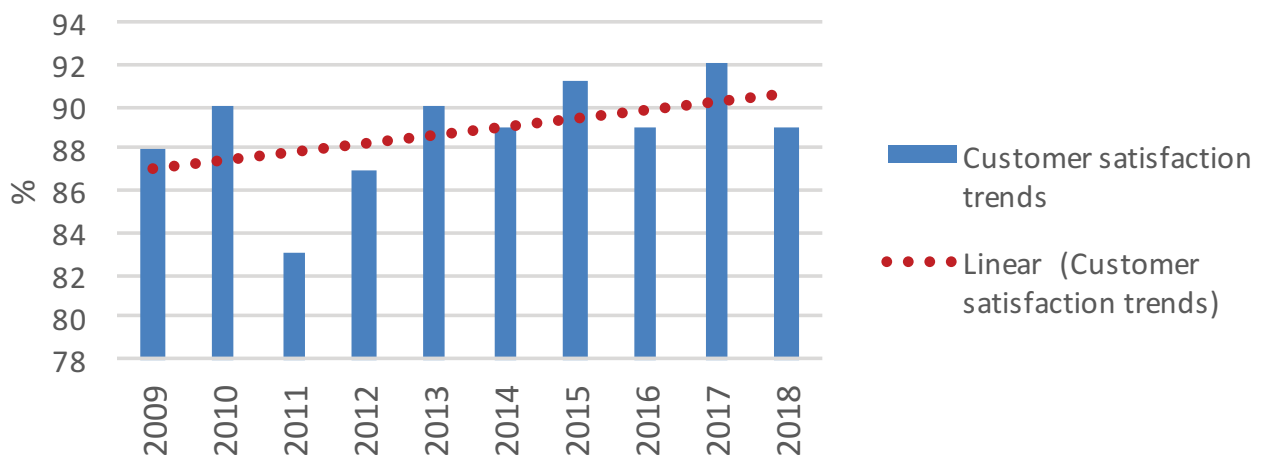
The customer satisfaction and net promoter scores that BÉ has achieved with its customers has remained

stable and high over the last decade. Customer satisfaction levels took a hit since 2017 as a result of the strike and due to work practice changes, but have been improving through 2018 (see overleaf)

Customer sentiment is being addressed through rollout of LEAP, simplified fare structure, service developments and “Brilliant Basics” (Punctuality, Reliability, Cleanliness)

These customer scores compare very favourably to customer ratings of international peers in the UK and across Europe.

Bus Éireann Customer satisfaction trends 2009 to 2018*



| Customer Sentiment – PSO City, Town and Stage Carriage Services | 2017* | 2018* |
|---|-------|-------|
| Customer Satisfaction | 92% | 89% |
| Rate Value for money | 71% | 71% |
| * 2017/2018 customer sentiment impacted by 22 days strike in 2017 | | |

Source: Bus Éireann Customer Charter Research by Interactions Ltd.

1.4 Impact on the Customer and the Community

- NTA consultation paper cites customer satisfaction market research undertaken in 2018.
- The market research reflects the work that Bus Éireann has undertaken on “Brilliant Basics” since the strike in 2017.
- 31% of Bus Éireann customers consider the service to be better, compared to “All Public Transport” of 19%.
- 17% of Bus Éireann customers are using the service “a lot more” compared to an all public transport average of 9%.
- Bus Éireann will continue to implement its “Brilliant Basics” programme to build its customer experience ratings in 2018 and 2019.

| Perceptions of Improvements to service (2018) | | | | | | |
|---|----------------------|-------------|------------|------------|------|------|
| | All public transport | Bus Éireann | Dublin Bus | Irish Rail | DART | LUAS |
| Better | 19 | 31 | 15 | 22 | 24 | 16 |
| The Same | 74 | 59 | 77 | 73 | 65 | 81 |
| Worse | 3 | 6 | 2 | 2 | 5 | 3 |
| Don't Know | 5 | 5 | 6 | 2 | 6 | 1 |

Source: NTA Customer Satisfaction Research 2018, Kantar Millward Brown (October 2018)

| Use of mode over the last 12 months (2018) | | | | | | |
|--|----------------------|-------------|------------|------------|------|------|
| | All public transport | Bus Éireann | Dublin Bus | Irish Rail | DART | LUAS |
| Use a lot more | 9 | 17 | 8 | 10 | 11 | 6 |
| Use a little more | 28 | 26 | 28 | 25 | 24 | 34 |
| About the same | 61 | 54 | 62 | 64 | 65 | 60 |
| Use a little less | 1 | 3 | 1 | 1 | 0 | 1 |
| Use a lot less | 0 | 0 | 1 | 0 | 0 | 0 |

Source: NTA Customer Satisfaction Research 2018, Kantar Millward Brown (October 2018)

1.5 - Impact on the Customer and the Community

- The level of network service developments and frequency increases that have taken place over the existing contract have been very considerable.
- Demonstrates Bus Éireann commitment to continuous improvement and flexibility to introduce change with the NTA.
- This is critical to building a sustainable platform for modal shift and helping to stimulate local economies.

No. of Network OVN's and frequency increases Implemented since award of 2014 - 2019 DAC

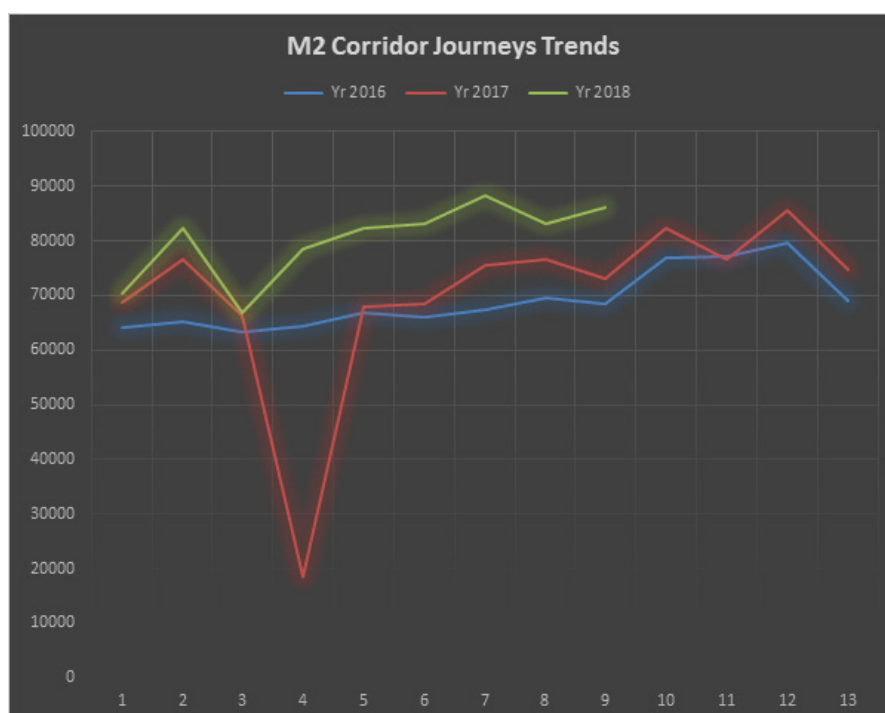
- 2013 - 30
- 2014 - 40
- 2015 - 96
- 2016 - 75
- 2017 - 44
- 2018 - 7 YTD
- Planned 2018 - 70

Total Implemented
292 to date and
369 by end 2018

| Summary of Network Changes (369 route changes 2014/2019) | 2014/2015 (136 Route Changes) | 2016 (75 Route Changes) | 2017 (44 Route Changes) | 2018 (70 Route Changes) |
|--|---|--|--|---|
| Cities | Route 202 - Cork City Network Route 203 - Cork City Network Route 205 - Cork City Network Route 208 - Cork City Network Route 209 - Cork City Network Route 29a2 - Cork City Network Route 215 - Cork City Network Route 216 - Cork City Network Route 219 - Cork City Network Route 220 - Cork City Network Route 221 - Cork City Network Route 223 - Cork City Network Route 401 - Galway City Network Route 404 - Galway City Network | Route 202 - Cork City Network Route 208 - Cork City Network Route 206 - Cork City Network Route 215 - Cork City Network Route 220 - Cork City Network Route 215a - Cork City Network Route 220x - Cork City Network Route 301 - Limerick City Network Route 302 - Limerick City Network Route 303 - Limerick City Network Route 304 - Limerick City Network Route 304a - Limerick City Network Route 305 - Limerick City Network Route 306 - Limerick City Network Route 404 - Galway City Network Route 405 - Galway City Network Route 409 - Galway City Network | Route 401 - Galway City Network Route 202 - Cork City Network Route 205 - Cork City Network | Route 301 - Limerick City Network Route 302 - Limerick City Network Route 303 - Limerick City Network Route 304 - Limerick City Network Route 404a - Limerick City Network Route 306 - Limerick City Network Route 313 - Limerick City Network Route 401 - Galway City Network Route 402 - Galway City Network Route 404 - Galway City Network Route 405 - Galway City Network Route 407 - Galway City Network Route 409 - Galway City Network Route 203 - Cork City Network Route 206 - Cork City Network Route 208 - Cork City Network Route 215 - Cork City Network Route 215a - Cork City Network Route 216 - Cork City Network Route 220 - Cork City Network Route 220x - Cork City Network Route 223 - Cork City Network |
| GDA Commuter | Route 100 - M1 Corridor Route 103 - M2 Corridor Route 105 - M2 Corridor Route 111 - M3 Corridor Route 115 - M4 Corridor Route 130 - M7 Corridor Route 132 - N81 Corridor Route 133 - M11 Corridor | Route 109a - M3 Corridor Route 111 - M3 Corridor Route 111a - M3 Corridor Route 111x - M3 Corridor Route 115 - M4 Corridor Route 103 - M2 Corridor Route 103x - M2 Corridor Route 105 - M2 Corridor Route 105x - M2 Corridor Route 190 - Drogheda Network Route D1 Drogheda Network | Route NX - M3 Corridor Route 109 - M3 Corridor Route 109b - M3 Corridor Route 109x - M3 Corridor | Route 103 - M2 Corridor Route 115 - M4 Corridor Route 115a - M4 Corridor Route 133 - M11 Corridor |
| Stage Carriage and Rural | Route 160 - Eastern Network Route 167 - Eastern Network Route 233 - Cork Network Route 235 - Cork Network Route 243 - Cork Network Route 245 - Cork Network Route 270 - Kerry Network Route 271 - Kerry Network Route 272 - Kerry Network Route 273 - Kerry Network Route 274 - Kerry Network | Route 350 - West Clare Network Route 355 - Waterford Network Route 456 - Mayo Network Route 458 - Mayo/Sligo Network Route 480 - Donegal Network | Route 271 - Kerry Network Route 275 - Kerry Network Route 350 - West Clare Network Route 360 - South East Network Route 440 - Mayo Network | Route 236 - West Cork Network Route 237 - West Cork Network Route 238 - West Cork Network Route 333 - West Clare Network Route 336 - West Clare Network Route 360 - South East Network Route 424 - Galway Network Route 420 - Mayo Network Route 421 - Mayo Network Route 422 - Mayo Network Route 440 - Mayo Network |

1.6 – Proposed routes for tendering - M2 corridor (Routes 103, 103x, 105, 105x) and M11 corridor (101, 101x, 132, 133)

- NTA Consultation document proposes that certain routes in the Dublin commuter Area will be tendered out:
 - Routes linking East Coast Towns and Dublin (M11 corridor 101, 101x, 132, 133).
 - Routes linking Ashbourne, Dunshaughlin and Dublin (M2 Corridor 103, 103x, 105, 105x).
- Bus Éireann would point to the following on the M2 corridor:
 - Very high levels of customer journey growth in 2018 (Route 103 – 14% growth since 2017, Route 105 50% growth since 2016).
 - Very high levels of Leap Card usage (58% on 103, 95% on 105x).
 - Service delivery improving - Cancellations now at a minimal level).
- Bus Éireann would also point to the following on the M11 corridor:
 - Route 101/101x – 15% customer journey growth in 2018, 42% of all trips on Leap card, service delivery issues being addressed.
 - Route 133 – 46% of all trips on Leap Card. Route network enhancement plan currently in progress.
- Demonstrates Bus Éireann commitment to continuous improvement through “Brilliant Basics” to address the issues which emerged on the M2 and M11 corridors in 2017 and 2018.



1.7 - Bus Connects principles - BÉ Urban Networks aligning to this Project

Redesign of the Bus Network

The core strands of the Redesign of the Bus Network element in the Bus Connects Project are as follows:

- Standardise Service Categories & Simplify Radial Services
- Build Frequent Orbitals & Grow Suburban Feeder Network

BÉ has been aligning its network changes to these principles over the last number of years and has simplified its urban networks with standard high frequency alignments across all its networks e.g. Route 202 & 208 (Cork), Route 304 & 304a (Limerick) & Route 409 (Galway)

A significant network enhancement will be rolled out on the Route 220 Corridor in Cork City which will build further on the Bus Connects principles as follows:

- High frequency cross city timetable on a standard alignment

- 24/7 operation delivering first 24hr Urban Route
- City centre stops are located to allow transfer to other high frequency routes
- Local feeder services will link to hubs at Carragaline & Ballincollig
- Orbital services will be introduced linking to these hubs
- Standalone Peak hour services will serve major trip generators in the AM & PM peak in locations other than the city centre

Other changes in line with Bus Connect Principles have been rolled out on smaller urban networks which have delivered significant growth in customer usage as follows:

- Athlone Town: Customer usage grew by over 100% in the 1st year of enhanced service
- Waterford – Tramore Service: Customer usage has grown by over 36% in 2018



1.7 - Bus Connects principles - BÉ Urban Networks aligning to this Project



Improvements to Fares and Ticketing

- Leapcard introduced on all urban networks
 - 30% on all single cash fare tickets
 - Common range of products on all networks
 - Joint Bus/Rail Products in the Cork Urban Network
- Zonal Fare Structures Simplified
 - Only 1 zone per urban area (Cork Red & Green combined)
 - Zones extended to reflect the “real” urban area’s:
 - Oranmore & Barna -Galway Urban Network
 - Annacotty & Castleconnell - Limerick Urban Network
 - Tramore in Waterford & Laytown in Drogheda
- Urban Fare Structures in the Cork Urban Zone designed to allow easy movement to “Flat Time Based Fare on all PT Modes” at any time.
- Standard fares apply on all night services

Improved infrastructure & Bus Priority

- Rollout of TFI Bus Poles & Bus Stop Information in Athlone & Waterford by end Sept 18
- Rollout of TFI Bus Stop Information in Galway & Limerick by end Nov 18
- All planned network changes rolled out in this format
- Rollout of “SCN” to all stops by end 2018.
- Rollout of the Patrick Bus Gate on the Cork Urban Network – Aug 2018
- Constant review of pinch points on all networks with Local Authority & NTA
- Core urban routes planned to align with current & planned infrastructure
- Review of infrastructure & accessibility at all bus stops completed

1.8 – Bus Éireann Strategic Focus

Our objective is to create a sustainable business model that exceeds customer expectations and provides greater value for money for the State.

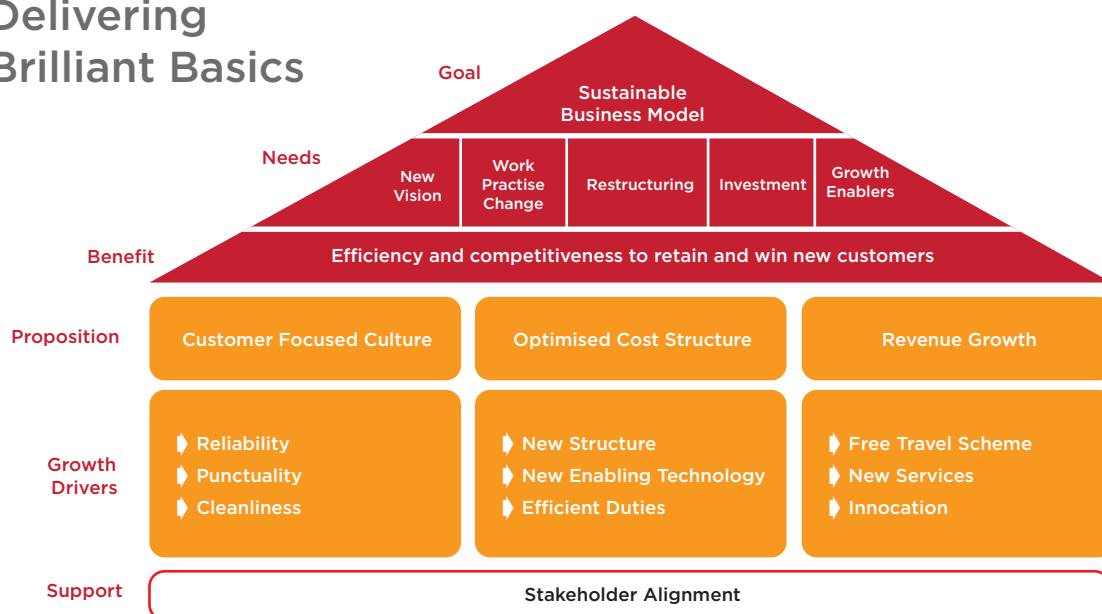
2 PHASES OF TRANSFORMATION



Transforming for further growth continues:

- Renewed customer centric approach.
- “Brilliant Basics” (Punctuality, Reliability, Cleanliness)
- Leveraging technology
- Alignment of goals between staff, regulator and customer
- New management and performance oriented structure, aligned to contractual obligations.
- Increased focus on reliable and accurate performance measurement

Delivering Brilliant Basics



Stakeholder alignment = NTA, Local Authorities, Customer, Staff, Competent Authority Grouping.

1.9 – Bus Éireann Transformation Programme 2017/2019

Bus Éireann has embarked on a significant strategic turnaround and restructuring to make it more competitive in the evolving marketplace.

Delivering cost reductions which are being shared with the customer and with the NTA/DTTS and will continue through 2018 and early 2019.

Organisational restructuring which puts customer at the centre. The process will identify the critical elements of service delivery and related KPIs, and the organisational structure process and skillsets required to achieve best in class service delivery. New

management appointments including appointment of Chief Customer Officer and Chief People Officer a critical element of this change.

During transition phase, our ability to meet certain KPI targets has been constrained. This is being addressed as part of Transformation Programme (Resourcing, investment, training, internal communications).

By 2019, new competitive cost base and organisational structure which will be more cost effective and efficient, meeting one of the fundamental requirements of the PSO regulation.

Phase One - 2017/2018 – Focus on Cost Efficiencies

- Restructuring
- Payroll – terms and conditions
- Bus Hire Savings
- Non payroll savings
- Network reconfiguration
- Income generation

Phase Two - 2018/2019 - Customer Focus

- Service Delivery & Quality
- Technology and Innovation
- Structure and Efficiency
- Governance, KPIs and reporting
- Cultural Change



1.9 – Bus Éireann Transformation Programme 2017/2019

| | | | |
|---------------------------------------|---|--|---|
| Innovation | PSO Technology: <ul style="list-style-type: none"> • Next generation ticketing (eCommerce, contactless payment, integrated ticketing, mobile ticketing) • TGX Machines (PSO)/enhancements • SCN Project • Website development | | |
| Structure and Efficiency | Efficiency Projects <ul style="list-style-type: none"> • Route Optimisation • Bus Hire Plan • IVU Upgrade • Microbus vehicle module • SAP integration for depot management • Microbus drivers portal • VDV no alighting | Enabling Projects: <ul style="list-style-type: none"> • Procurement & Invoicing • Cash Collection • Stations development • TVMs • AV displays • Payroll • Security/CCTV • Telematics | 2018 non payroll projects: <ul style="list-style-type: none"> • Non payroll phase 2 Process Mapping/Re-engineering |
| Service Delivery and Quality | PSO Contract: <ul style="list-style-type: none"> • DMS Action Plan • Vodafone APN • WLAN replacement • AVL MTV system – cause codes • Punctuality Improvement Programme • PSO Network Development Programmes • Fleet deployment and utilisation • Penalty management • Mystery Shopper projects • Bus Pole/Customer information projects PSO BMO <ul style="list-style-type: none"> • Waterford Services Implementation (Q3 2018) • Dublin Commuter BMO transition plan | | |
| KPIs, Reporting and Governance | Performance Reporting: <ul style="list-style-type: none"> • PSO Performance Reporting System • Weekly dashboards • NTA Schedule 18 transition • Route Profitability System | Governance/Control/ <ul style="list-style-type: none"> • Project Management • PPMS • GDPR Readiness • Risk Management System (RMIS) • Payroll – Core Upgrade • MSP Upgrade • ME road swipe card roll out • Ecommerce worldpay | |
| Cultural Change | Change Management <ul style="list-style-type: none"> • Customer service training • Employee Portal • Internal Comms plan for Change Management • External comms / corporate reputation plan | CSR/Community <ul style="list-style-type: none"> • Corporate and Social Responsibility Plan • Environmental Plan | |

1.10 - New Structure aligned to the Customer

- Strengthened Senior Management Team in place:
 - Driving forward the transformation plan and taking business to next level
 - New thinking and driving culture change
 - Focus on employee engagement and culture change
 - Driving brilliant basics and delivering for our customer
- New Central Functional based support structure with Regional Service Delivery Structure introduced:
 - Focused on service delivery
 - Punctuality and Reliability
 - New performance driven culture - focus on KPI's
- National Operator with unrivalled Local Knowledge and Experience:
 - Strong stakeholder relationships, both nationally and locally, developed over many years.
- Investment in delivering for our customers
 - Successful National Recruitment campaign to delivering 200+ new drivers for service expansion
 - Rolling out fully resourced AVL control centres

| Key Priorities | Update |
|--|--|
| Strengthened Senior Management Team | <ul style="list-style-type: none"> • Recruitment complete for new strengthened Senior management team. |
| Driving Culture Change | <ul style="list-style-type: none"> • New Chief People Officer appointed and joining business August 2018 • New Head of Culture & Engagement role created July 2018 • Key focus on employee engagement |
| New business structure introduced aligned towards delivering for our customer | <ul style="list-style-type: none"> • New Functional structure introduced – supporting regions in delivery to the customer • Regional Operations structure introduced focussed on service delivery. |
| Performance Driven culture | <ul style="list-style-type: none"> • KPI's introduced with customer focus • Key focus on Punctuality and reliability • Focus on brilliant basics • Focus on continuous improvement in all areas of the organisations. |
| Supporting Service Delivery to the customer | <ul style="list-style-type: none"> • Driver recruitment progressing well • Upgrading AVL control centres underway • Punctuality improvement plan underway • Developing out-based operational structure to ensure supports consistent delivery to the customer. |

2 – RATIONALE FOR CONTINUED DIRECT AWARD INVOLVEMENT IN THE GENERAL ECONOMIC INTEREST



2.1 – Best Practice Direct Award Approach in Europe



Study on the economic and financial effects of Regulation 1370/2007 on public passenger transport services February 2016, Steer Davies Gleave for the European Commission (EC). Findings show:

This EC study analysed a range of case studies for the adoption of EC regulation across Europe. These included:

- Stockholm Metro, Sweden – Competitive Tender
- Emilia Romagna Bus, Italy – Competitive Tender
- Budapest, Hungary – Trolleybus/Bus – Direct Award/Competitive Tender
- Grenoble France – Light Rail/Bus – Competitive Tender
- Ulm, Germany – Light Rail/Bus – Direct Award
- Manchester Metrolink – Light Rail – Competitive Tender
- Bus Éireann – Bus – Direct Award



**IRELAND
SCORED
HIGHEST**

**PERFORMANCE
REPORTING AND
MONITORING**

(Article 7 reports)



**DIRECT
AWARD
MODEL**

**PSO REGULATION
BEING IMPLEMENTED
EFFICIENTLY AND
EFFECTIVELY**

2.2 – Competitive Benchmarking

Recent studies and benchmarking exercises undertaken by Bus Éireann (authored by the TAS partnership) point to the following:

Cost profiling shows that BÉ PSO costs is in line with UK operators (CPT 2016 Comparison)

- A relatively compact supported vehicle kilometre network;
- One of the smallest total net costs (funding). Adjusted for reasonable profit and prior year allocations.
- Average net cost per bus passenger journey (for supported bus services); and
- One of the lowest net cost per resident population (for supported bus services)
- BÉ Cost per supported km equivalent to that in regional parts of UK, and very favourable to London. BE cost per km include direct operating cost and infrastructure administration costs.
- Net Cost per capita is very favourable to all locations
- It is clear that on both metrics, urban services tend to be more expensive.

Benchmarking through Busmark (CILT UK) also supports this conclusion.

Winning the Waterford BMO tender, and other competitive tenders initiated by the NTA, against domestic and international competitors provides a basis of evidence of the ability of Bus Éireann to operate and compete successfully in either DAC or tendered environment.

This is a fundamental requirement for Direct Award as envisaged under the principles of 1370 regulation.

| 2016 (i.e. Pre Transformation Programme) | Vehicle KM | Net Cost (m) | Net PSO Cost per km (€) | Passenger Journeys (m) | Net Cost / Passenger (€) | Resident population (m) | Net Cost/Capita (€) |
|--|--------------|--------------|-------------------------|------------------------|--------------------------|-------------------------|---------------------|
| Bus Éireann (Adjusted PSO) | 35.74 | 46.60 | 1.30* | 32.12 | 1.45 | 3.59 | 12.98 |
| London | 487.89 | 772.76 | 1.58 | 2,292.65 | 0.34 | 8.79 | 87.92 |
| England/Mets | 62.76 | 144.11 | 2.3 | 69.29 | 2.08 | 11.87 | 12.14 |
| England /Non Mets | 170.74 | 201.88 | 1.18 | 126.03 | 1.6 | 34.61 | 5.83 |
| Northern Ireland | 65.98 | 76 | 0.93 | 65.2 | 1.17 | 1.86 | 40.82 |
| Scotland | 55.2 | 65.57 | 1.19 | 27.54 | 2.38 | 5.4 | 12.13 |
| Wales | 24.22 | 30.12 | 1.24 | 13.41 | 2.25 | 3.11 | 9.67 |

* BE PSO subvention per km forecast to drop to €1.08 per km in 2019

| Operating Cost Comparisons 2016 (Pre Transformation Programme) | Bus Éireann % | CPT 2016 UK Average % |
|--|---------------|-----------------------|
| Labour Costs (Drivers/Other) | 58.7 | 59.0 |
| Insurance and Claims | 2.9 | 2.5 |
| Fuel | 14.7 | 16.3 |
| Maintenance materials | 6 | 4.4 |
| Depreciation/Leasing | 4.4 | 6.4 |
| Other (inc overheads) | 13.4 | 11.4 |

Source: TAS partnership – data compiled from company annual reports and other related company documentation.

2.3 – Partnership Approach – Competent Authority Grouping

- The direct award approach makes best use of available resources that are available to the Competent Authority Grouping (i.e. the Minister for Transport, Minister for Education, DTTAS, DoES, NTA, CIE and Operating companies).
- This competent authority grouping approach has been agreed with the EC.
- Proven track record of working with the NTA, DTTAS and with all PT stakeholders. Bus Éireann provides a range of specific public transport competencies, local knowledge, brand equity, community linkages etc.
- Since 2009, it is clear that a wide variety of approaches to PSO regulation implementation have evolved across Europe, and that successful and sustainable PT implementation requires quality managers and partnership at all levels within the Competent Authority Grouping.
- If the objectives of the Authority in relation to public service contracts are reviewed in terms of the regulatory approach most suited to the Irish environment, Bus Éireann contends that direct award approach outscores an augmented tendering approach in the general economic interest, given the range of capabilities that exist across the competent authority grouping

| Issue | Why Competent Authority Grouping/BE Direct Award Approach works from a Partnership Perspective |
|---|---|
| Track Record | Proven track record in PT network management and operational service delivery since 2009 across the Competent Authority Grouping |
| Legal Certainty | Satisfies all necessary EU Regulatory Requirements and the requirements of the European Commission – Best practice case study for Direct Award in Europe. |
| Model certainty | Exit costs and challenges need to be articulated if further tendering is envisaged. |
| Partnership approach | Collaborative working relationship with NTA – Partnership Approach to problem-solving and customer solutions. |
| Best use of available skills | Transport Management capabilities on both sides of the contract. |
| Sharing of production and revenue risk | Net cost approach is a proven model – limits the risk to the Authority – incentivises the operator. |

2.4 - Partnership Approach to social and economic inclusion – Subsidiarity and Scale



- Bus Éireann provides a range of specific public transport competencies, local knowledge, brand equity, community linkages etc.
- Proven track record of working with the NTA, DTTAS and with all PT stakeholders.
- Long track record of providing social and economic inclusion transport solutions tailored to specific urban and rural needs.

| Strength | Why BÉ Direct Award Approach works in relation to Social and Economic Inclusion from a Partnership Perspective |
|--|---|
| Flexibility | Direct Award relationship is best placed to cater for differing economic and social progress environments, including downturns and rapid economic expansion, which both require flexibility on the part of the Authority and Operator. |
| Regional scale | <p>The direct award approach has proven to be an ideal approach to public service obligation (social and economic) delivery in a small Island economy with dispersed population patterns, with a population equivalent to that of Greater Manchester, but with a geographic area 54 times the size.</p> <p>Bus Éireann's expertise across a range of public transport markets (Urban, Rural, Schools) is best utilised in terms of maintaining working relationships with local and national PT stakeholders.</p> |
| Mixed model (Urban/Rural) Requirement | Model outside GDA is focused on meeting urban and rural social/economic inclusion and requires a high level of inter regional management, and making best use of the network effect across urban, semi-urban and rural networks. |
| Customer sentiment | Customer sentiment has remained high across all socio economic groupings under the BE direct award approach compared to UK and Euro equivalents. |

2.5 – New Structure and Value for Money for the State

- By 2019, Bus Éireann will have a new regional and operating structure in place to meet the evolving needs of the public transport sector.
- The structure will support sustainable service delivery that is efficient and effective and will provide greater value for the State.

| Aspects of new approach | Where Bus Éireann will be in 2019 |
|---|---|
| Streamlined Structure | New corporate structure and management team with revised regional approach. |
| Sustained high levels of customer satisfaction | <p>The direct award approach has proven to be an ideal approach to public service obligation (social and economic) delivery in a small Island economy with dispersed population patterns, with a population equivalent to that of Greater Manchester, but with a geographic area 54 times the size.</p> <p>Bus Éireann's expertise across a range of public transport markets (Urban, Rural, Schools) is best utilised in terms of maintaining working relationships with local and national PT stakeholders.</p> |
| Cost Competitiveness | Model outside GDA is focused on meeting urban and rural social/economic inclusion and requires a high level of inter regional management, and making best use of the network effect across urban, semi-urban and rural networks. |
| Service Delivery | Customer sentiment has remained high across all socio economic groupings under the BE direct award approach compared to UK and Euro equivalents. |
| Market and Local Knowledge/Experience | Vital input which is close to the customer and the community. |
| Integrated national network | Regional hubs connected by interregional and stage carriage service – Linking rural to village to town to city and beyond. Network of stations, shelter and bus poles. |
| Safety Quality and Assurance Systems | Model outside GDA is focused on meeting urban and rural social/economic inclusion and requires a high level of inter regional management, and making best use of the network effect across urban, semi-urban and rural networks. |
| Special Events/Emergencies | Track record of meeting State's public transport requirements during severe weather emergencies and Special Events (Special Olympics, Diplomatic Visits etc.) |

3 – CONCLUSIONS AND RECOMMENDATIONS



3.1 - Conclusions

- Significant body of evidence shows the Direct Award approach utilised in Ireland is as efficient and effective as its international peers.
- Proven ability - strong working relationships - providing greater value to the State - renewed focus on the customers and our employees - on the basis of collaborative projects, simplified fare structure, new fleet approach and customer centred service developments.
- Bus Éireann should be judged on its performance over the period of the two Direct Award contracts (as required by the EU) since 2009. It should also be assessed on the efficiency and effectiveness it plans to provide once the transformation programme has been implemented at the end of 2018/early 2019.
- Transformation programme - significant cost efficiency and organisational change - one of the most fundamental changes that a PS organisation has embarked on - Supported by a new management team - Key focus of 2017 was on realising cost efficiencies, while the focus in 2018/2019 is on improving the customer offering.
- The experience of the last few years shows that when Bus Éireann is adequately resourced (Key foundation of Altmark principles) in relation to steady state investment it performs very well compared to its international peers, and provides greater value to the State.
- The EU acknowledges the progress that Ireland has made in terms of implementing the PSO regulation since 2009. The net cost direct award approach is successful to date with a low residual risk.

| Issue | Performance under Direct Award Contract | Areas of concentration in 2018/2019 | Where we want to get to |
|---|--|---|--|
| Network and Service Development | <ul style="list-style-type: none"> • Continuous improvement approach adopted since 2009 - Focus on urban services development | <ul style="list-style-type: none"> • Range of service improvements agreed with NTA under Direct Award, covering urban, commuter and rural locations. • Implementation of BMO Waterford tender | <ul style="list-style-type: none"> • Bus Connects programme outside GDA with related investment in facilities and bus priority measures |
| Cost Efficiencies | <ul style="list-style-type: none"> • Transformation Programme gives Bus Éireann a competitive cost base | <ul style="list-style-type: none"> • More service developments and customer improvements for less funding • Maintain competitive cost base compared to International benchmarks and standards | <ul style="list-style-type: none"> • Continuous improvement • Sustainable Cost Base • VFM for the State. |
| Service Delivery Punctuality Reliability Cleanliness | <ul style="list-style-type: none"> • Impacted by economic growth and focus on transformation programme in 2017 | <ul style="list-style-type: none"> • Plans in place to rectify | <ul style="list-style-type: none"> • Stretch targets |
| Fleet Quality | <ul style="list-style-type: none"> • Fleet has aged from 4.8 years to 7.3 years since 2010 | <ul style="list-style-type: none"> • Fleet Investment • Ecodriving and Telematics | <ul style="list-style-type: none"> • Green fleet strategy beyond 2019 |
| Customer Service and customer facilities | <ul style="list-style-type: none"> • Impacted by lack of investment during the economic downturn | <ul style="list-style-type: none"> • Facilities improvement programme in place • Driver customer service training | <ul style="list-style-type: none"> • Customer First • Steady State plus growth investment |
| Investment in customer facing technology | <ul style="list-style-type: none"> • Adoption and roll out of Leapcard across the network | <ul style="list-style-type: none"> • Rapid growth in Leapcard usage | <ul style="list-style-type: none"> • VFM technology solutions |
| Investment in data management systems | <ul style="list-style-type: none"> • Additional investment required to meet increased requirements from 2014/2019 contract | <ul style="list-style-type: none"> • Increased investment in AVL technology | <ul style="list-style-type: none"> • Increased investment in AVL technology |
| Restructuring | <ul style="list-style-type: none"> • Significant restructuring during transformation programme - functional and regional | <ul style="list-style-type: none"> • Ongoing restructuring | <ul style="list-style-type: none"> • Best fit structure and operating model |

3.2 - Recommendations

Bus Éireann would recommend that a Direct Award approach should be continued post 2019 in order to realise the benefits that are either already in place or evolving in the General Economic Interest.

- The main reasons are:
 - Legal and financial certainty of Direct Award approach
 - Best practice direct award approach in Europe
 - Competitive benchmarking with international peers
- Partnership approach of the Competent Authority Grouping
- The benefits of a direct award approach in relation to subsidiarity and scale
- The Value for Money (VFM) that BE will provide
- While good progress has been made over the transition phase, much more can be achieved through a greater focus on the customer and on service improvement and a common vision.
- Significant progress is possible in relation to bus priority measures, bus lanes and segregation, traffic management, and environmentally friendly Public Transport.
- Renewed focus on the development of the partnership approach under a Direct Award to Bus Éireann by the National Transport Authority can address a number of strategic priorities for the next decade, in conjunction with all PT stakeholders.

| Strategic Priorities for the next Decade | Bus Éireann Focus - Partnership Approach |
|--|---|
| Legal and Financial Certainty | <ul style="list-style-type: none"> • Build on the track record created with the European Commission in relation to the implementation of the PSO Regulation since 2009. |
| National Planning Framework - Steady State plus Growth | <ul style="list-style-type: none"> • Service Development - Capacity and Frequency • Facilities • Fleet • Technology - Customer facing and back office |
| Balanced Regional Development | <ul style="list-style-type: none"> • Development of PT for all geographic and social demographic requirements |
| Renewed focus on customer and connectivity | <ul style="list-style-type: none"> • Customer First • Customer technology • Customer information |
| Investment in transport management capability across Competent Authority Grouping | <ul style="list-style-type: none"> • Driver competency • Support services |
| Building stakeholder dialogue and communication | <ul style="list-style-type: none"> • New forum for dialogue on evolving public transport requirements across urban and rural • Community focused - close to the passenger |
| Building on the Transformation Programme | <ul style="list-style-type: none"> • Innovation • Structure and Efficiency • Service Delivery and Quality • KPIs, Reporting and Governance • Cultural Change |

3.3 - In summary



- This report points to the progress that has been made in Bus Éireann over the last decade.
- It is built on a good working relationship with the Authority and has delivered results through the economic downturn and promises more as the economy recovers.
- The Direct Award has been positive for social and economic inclusion, delivering tangible customer benefits and cost effectiveness for the State compared to other regulatory approaches.
- Bus Éireann offers a one stop shop - we are a local operator with a corporate approach, implementing consistency of approach, in conjunction with performance objectives set out under the DAC.
- The Transformation programme underway will bring a step change in the efficiency and effectiveness of the Bus Éireann offering – significant change has been experienced but it will be worth it.
- We look forward to working in partnership with the NTA beyond the Transformation Programme, evolving with the needs of the Competent Authority Grouping, the customer and the greater economy in Ireland, in the general economic interest.

4 - TESTIMONIALS

Thanks to all from Bus Éireann who worked with us over the past week at the IWAS (International Wheelchair and Amputee Sports Federation) World Games Ireland, 2018.* The service you provided was hugely helpful to us throughout the week, and delivered to the highest standard at all times. Please convey my thanks to all of the drivers who did the airport and shuttle runs.

Nicky Hamill,
Director of Sport, Irish Wheelchair Association

Fab memories & so proud of everyone who made @edsheeran weekend special - many people to thank but for now take a bow @aikenpromotions @EdSheeranFans @PaircUiChaoimh @AnGardSiochana @RepublicofPeter @Buseireann @corkcitycouncil @CorkAirport @CorkCityFire @CorkEveningEcho @HSELive

Cllr Tony Fitzgerald,
Lord Mayor of Cork

Please pass on my compliments to all those who worked so hard with you over the period of the emergency in the National Emergency Co-Ordination Group (NECG).

....This expertise allowed us to meet many challenges and circumstances This letter is but a token of the esteem and respect with which you and your colleagues are held, by the Government & people of Ireland.

Excerpt from letter to NECG chairman from Taoiseach Leo Varadkar after Storm Emma, and issued to Bus Éireann as a NECG member.

On behalf of the National Team and Management we would like to say thank you to all involved at Bus Éireann for providing the Irish team with a top class service this season."

Michael Kearney,
Irish Team Manager, Irish Rugby Football Union

Industry Awards:

Best Transport
Communications – Winners
2014 and 2017

Passenger Transport
Company of the Year – 2016

Best Customer Focus
Award - 2017

Over the past number of years Bus Éireann have acted as transport provider to An Garda Síochána, transporting members of the force nationwide as required during significant events including the Royal and Presidential visits in 2011, the G8 summit in 2013 and the visit of the US Vice President in 2013. In 2018 Bus Éireann will once again transport An Garda Síochána for the Papal Visit in August 2018.

I want to sincerely thank Gabor, driver of Route 220 for his patience with my dad. He knew when talking to my dad that something wasn't right and he found his identify key ring which has family contact details on it and took the time to ring us. Thank you Gabor. Bus Éireann you should be very proud to have such compassionate staff.

Fiona Carolan,
Cork via Facebook, whose father has Dementia

Consistent, regular and reliable. Friendly and makes you feel comfortable.

Reprtrak survey,
7,000 members of the public, January - March 2018

I have travelled with Bus Éireann for years and have found them to be a great company.

Reprtrak survey,
7,000 members of the public, January - March 2018

**WE DON'T JUST
CONNECT PLACES.
WE CONNECT PEOPLE.**

**And with Leap you can connect
to 30% savings too.**



Bus Éireann

Make Better Connections

Bus Contracts,
National Transport Authority,
Dún Scéine, Iveagh Court,
Harcourt Lane,
Dublin D02 WT20

30 October 2018

Re: Stakeholder Submission from the Design & Crafts Council of Ireland

The Design & Crafts Council of Ireland (DCCol) was delighted to partner with Bus Éireann during 2015 as part of Irish Design 2015 (ID2015), the year-long Government-backed initiative celebrating and promoting Irish design in Ireland and around the world. From the outset, Bus Éireann was very open to the idea of becoming involved and following discussions regarding the objectives of both organisations and exploring opportunities for collaboration, Bus Éireann Expressway became the official transport partner for Irish Design 2015. Through the partnership, five bespoke bus wraps were designed by leading design talents drawn from a broad spectrum of disciplines, celebrating their own creative and artistic excellence by way of Expressway's stylish new coach fleet. The wraps were designed by Orla Kiely, Kevin Thornton, Maser, Roughan & O'Donovan and Brown Bag Films. Bus Éireann's investment in the initiative included producing the five full-colour bus wraps and promoting the new coaches to Irish audiences which resulted in significant media coverage.

In keeping with ID2015 goals of creating greater public awareness and appreciation of design in Ireland and raising the profile of contemporary Irish design and designers, the collaboration with Bus Éireann extended the reach of the ID2015 message throughout the island of Ireland to locals and visitors alike in an impactful and engaging way, presenting design in an unexpected context and application. Bus Éireann Expressway is an integral part of communities in every corner of the country and this initiative offered a high profile local expression of ID2015's ambitious programme right across the island of Ireland. It demonstrated the breadth of internationally acclaimed Irish designers working across a range of disciplines in an innovative way, challenging the boundaries of what bus or coach design could be in Ireland.

This project enhanced and complemented other promotional platforms aimed at building visibility of Irish design during 2015 and it is wonderful to see the wrapped buses still in use on routes across the country three years on. The partnership was a great success for all parties involved, building a stronger relationship between Bus Éireann and DCCol and paving the way for potential opportunities in the future.

Karen Hennessy



Chief Executive
Design & Crafts Council of Ireland

To whom it may concern.

We are very happy to be working with Bus Eireann on the 350 route where we have forged an agreement to sell Bus & Boat tickets to BE passengers.

We approached BE and found the company representatives very open and enthusiastic eventually bringing to fruition this summer our collaboration. The real winner here is our foreign visitor who prefers to travel by public transport.

Already the 350 route caters for tourists uniquely in transporting them along the Clare coast on the Wild Atlantic Way. This along with many other BE routes travel across our unique and stunning landscapes contributing hugely to sustainable tourism (and communities) in remote and rural parts of Ireland. Through the BE services they are consistently connecting our people and place (landscape). Being part of this connection is the ultimate desire of tourists to our shores.

We would like to congratulate BE on their dedication of service, openness and willingness to forge new collaborations in providing new creative options for tourist and locals alike. And wish they continue to do so that we (and others) may continue to have the opportunity to work with Bus Eireann in partnership for a long time to come.

Best Wishes, Bridgette Brew
Doolin Ferry, No 1 Doolin Pier, Doolin, Co Clare.

We'd like to see you at Tourism Ireland UKI 100, WTM 5-7 November, Excel, London.

To whom it may concern,

As a member of Kells and district tourism network I wrote to Joanne Downey earlier in the year with regards to promoting Kells Co.Meath as a tourist destination as you do with Trim in Co.Meath.

The 109 and the 109a bus route is such an excellent service provided by Bus Eireann for the people of Kells and district, but I feel it could be also further enhanced by advertising the route to tourists. As Kells is home to the famous book and the Monastic site tourists could be out of Dublin and walking in the footsteps of the monks within an hour.

We would love to work with you in promoting Kells and the 109 service which goes right through the heart of the Boyne valley.

Kind regards,

Olivia Ferguson.

Transport, Energy, Aviation & Construction Division

TRANSPORT SECTOR

Liberty Hall, Dublin 1

Tel: 01-8586453 Fax: 01-8780087

John Murphy -Transport Sector Organiser

25/10/2018



Re: BUS CONTRACTS - PUBLIC CONSULTATION

Dear Sir/Madam,

We are writing to you as part of the ongoing public consultation process on the proposed Bus Contracts. While we welcome the proposal to directly award the current Public Bus Service Contracts to both Dublin Bus and Bus Eireann from 2019 to 2024, we are totally opposed to the proposals to remove 10% of the Bus Eireann Services in 2021 with the intention to openly tender such services at that time. Such proposals are flawed and appear only motivated by an agenda that **“competitive tension in the market is good for the consumer”** or alleged **“value for money”** (both these phrases were used extensively by the NTA and the Department of Transport to justify the previous open tenders in 2016).

Public Bus Service Contracts must be about the provision of a vital Public Service, similar to Health, Education and Social Welfare services. Such contracts should be adequately funded by the exchequer, as they are socially necessary but not commercially viable, and not fall victim to profiteering and a race to the bottom in services and wages & conditions of employment.

The NTA's own consultation paper states in **Section 2.3 – Review of Recent Tender Competitions**, in reference to the 2016 Waterford City and Dublin Commuter Services, that **“The tender price offered by Bus Eireann was very competitive in both competitions and it is unlikely that much value could be achieved when looking at price alone”**. These Bus Eireann tenders were against the backdrop of Bus Eireann's recent significant financial difficulties yet this appears lost in the NTA's proposals to achieve “value for money” for the exchequer!

The NTA's consultation paper states that consideration must be given to **“Customer Satisfaction”** yet the paper further states that **“Bus Eireann has achieved a high level of satisfaction in a recent customer survey”**, the paper further identifies the Dublin Commuter and Waterford City Services as having the highest level of Customer Satisfaction across the Bus Eireann Services, yet despite this the NTA are proposing to put the Dublin Commuter Services up for open tender in 2021. This does not make commercial or business sense or indeed common-sense!

The NTA's consultation paper states that consideration must be given to **“Integration of Services”**. Integration of services is wholly dependent on reliability and punctuality. In the NTA's own document entitled **“Performance Report on the Current Bus Eireann Direct**

Award Contract” Bus Eireann exceeds the contractual requirements in such categories for each year reviewed (2015, 2016 & 2017).

The NTA’s consultation paper states that consideration must be given to “**General Economic Interest**” and under this section the NTA attempts to justify competitive tendering of public transport services by stating competitive pressure and market forces will reveal the most economically efficient provider and thereby leading to lower costs! This is contradictory to the NTA’s own earlier admission that value could not be achieved when looking at price alone. If as the NTA states that Bus Eireann has previously tendered very competitively then we must conclude that little if any difference existed in the previous prices submitted by interested contractors.

Furthermore, the NTA must be aware that both significant financial and Industrial Relations problems still exist within Bus Eireann. Workers, particularly within the Driver Grade, have experienced a severe lessening of their Terms & Conditions of Employment in the recent past. We now have driver duty spreads of 12, 13 and in some cases 14 hours (with only 8 hours of such paid time) and this is having an impact on driver fatigue and work life balance. This is a prime example of a “race to the bottom” scenario within Public Bus Service Contracts and should the NTA proceed with tendering of a further 10% of existing Bus Eireann Routes in 2021, the likely impact will be a further decline in Terms & Conditions and without doubt Industrial Action occurring in the Bus Service provision. This will not lead to any improvement in customer satisfaction, integration of services or indeed be in the general economic interest of those dependent on public bus services.

SIPTU is aware of the current wages and conditions of employment that apply within Bus Eireann compares favourably with the wages & conditions that apply within private operators, so we can only conclude that the profit margin is significantly higher than that which exists in Bus Eireann.

For these reasons SIPTU contends the proposals to openly tender 10% of the Bus Eireann Direct Award Public Bus Service Contract is flawed and should not proceed.

Yours sincerely,

John Murphy



OFFICE OF IMELDA MUNSTER T.D.
SPOKESPERSON ON TRANSPORT, TOURISM AND SPORT

Submission To National Transport Authority

By Sinn Féin TD and Spokesperson for Transport

Deputy Imelda Munster

30th October 2018

- I welcome that Dublin Bus was spared further privatisation under this process. They provide an excellent service in the greater Dublin area and have a proven track record for the past 30 years.
- Very concerned that Bus Eireann routes will be privatised further.
- Recommend that rather than privatising further services at BE, that the NTA call for the Department of Transport to provide additional funding to improve services and service frequency, and to expand service provision in areas where it is needed. The NTA accepts that some of these services are not financially viable - therefore surely it understands that giving attractive routes to private foreign companies will only weaken our public transport services and will ultimately prove to be more costly on the state, financially and of course socially.
- Will the NTA explain exactly why it continues to tender services - where exactly is this requirement in law? Rationale is not clear from consultation document.
- The NTA must reverse this decision and wait until a full review has taken place of the routes that were previously privatised - we suggest after 12 to 18 months of services running. It is outrageous to privatise more routes when we do not know if it is working, or if it adds to public transport. The NTA should take an evidenced based approach, rather than an ideological one, and stall all privatisation plans until a full review is conducted.



OFFICE OF IMELDA MUNSTER T.D.
SPOKESPERSON ON TRANSPORT, TOURISM AND SPORT

- Given the NTA's consultation document recognises that BE is performing well, and that problems at the company tend to be due to financial difficulties, I suggest that the NTA fund the company adequately to improve performance indicators. Given decades of under-funding it is not surprising that the company is experiencing difficulties. It is worth noting that Bus Eireann provides a public service - it is not intended to operate for profit. Its financial difficulties demonstrate a failure by the state and the NTA to adequately fund the service.
- I call on the NTA not to privatise further - it will cause serious damage to Bus Eireann and to public transport in this state. The continued erosion of our semi-state transport companies will have consequences in years to come, as has been the case in other jurisdictions that have gone down this road.

Is mise le meas

Imelda Munster

Office of Imelda Munster TD
Constituency Office 041-9873823
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| | |
|---|---|
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FORWARDED BY JEREMY RYAN FROM info@nationaltransport.ie

Case reference CAS-65698-S8T1C7 NTA:0000080000055585

Acknowledgement sent 4th November from info@nationaltransport.ie

Re: NTA Public Consultation on proposals to directly award contracts for public bus services from December 2021.

We, Cllr Réada Cronin, Cllr Mark Lynch and Cllr Thomas Redmond, elected members of Kildare Co Council are of the opinion that the proposal to remove a further 10% of services from the Bus Éireann contract in 2021 is mistaken and should not proceed.

10% of the routes up until recently operated by Bus Éireann have already been removed from the Bus Éireann contract, including the 120, 120C, 123, 124, 126 and 130. The new NTA proposal to remove a further 10% of services from the Bus Éireann contract from 2021, including the 101, 103, 105, 132, 133 would further undermine the capacity of Bus Éireann to provide an integrated public transport service that meets the needs of all sections of our communities.

These routes, both the first 10% that were removed from the Bus Éireann contract and now the second 10%, are high-volume commuter routes. As such, they not only provide essential commuter services – which need to be increased to reduce commuter congestion and reduce carbon emissions – but also provide revenue to cross-subsidise low-volume and orbital routes. These latter routes are essential as part of an integrated public transport service.

This kind of cross-subsidy is only possible within a single operator entity, which is what Bus Éireann is.

Private bus contractors, be they local / Irish or multinational, are in business to make profits. For example, according to the press statement from GoAhead of 7 Sept 2017, the company made £91 million profit from bus operations in 2016; and £89 million was given to shareholders. The CEO declared: “Internationally, we will be working towards our target of generating 15% to 20% of Group profit from operations outside the UK within five years.” The same principle applies to any other private operator: the objective is to make a profit for the owners or shareholders.

Private operators are therefore not going to cross-subsidise one another and are only going to seriously bid for contracts that maximise profits – primarily the high-volume routes. GoAhead is not going to give part of its revenues to Kavanaghs or Kearns; nor vice versa. This approach conflicts with the need for an integrated service, the primary purpose of which is to provide high-quality, frequent and linked-up public transport.

The removal of more services from the Bus Éireann contract would progressively reduce its capacity to cross-subsidise routes and thereby provide a high quality, integrated public transport service. Such a service needs to meet the requirements of peak-time commuters; and it needs to provide orbital services and services to communities with small populations and low passenger volumes - which do not yield sufficient revenues to be self-financing and thus require cross-subsidy.

This is increasingly necessary to provide an alternative to high-volume car use and to reduce road congestion and carbon emissions.

Government predictions show population growth requiring 500,000 new homes by 2040. If the thousands of new households in Kildare, Meath, Louth and Wicklow use cars to get to work, the roads will be completely jammed and carbon emissions will rise.

So we need a single public entity providing an integrated public transport service – not a multiplicity of competing private operators. Bus Éireann is best suited to be that public entity and therefore should not have any more routes removed from its contract.

Cllr Réada Cronin

Cllr Mark Lynch

Cllr Thomas Redmond

Anne Graham
National Transport Authority
Dún Scéine
Harcourt Lane
Dublin
D02 WT20

By email Buscontracts2019@nationaltransport.ie

Consultations on proposals to directly award contracts from December 2019 for Public Bus Services

Dear Anne,

Ibec, the group that represents Irish business, welcomes the opportunity to submit its views to the NTA on the proposal for direct award contracts to Bus Éireann and Dublin Bus. Ibec has long argued that an efficient economy with a growing population will require world class transport infrastructure. The gradual expansion of urban sprawl is symptomatic of a planning system that has not dealt with local and regional land use planning issues. As a result, the distances travelled by many commuters have grown. It is a remarkable fact that Irish citizens in 2016 were less likely to travel to work on foot, bike or by public transport than they were in 1986. This is a direct result of the fact that the number of people travelling longer distances to work has risen dramatically over the last 30 years.

One of the objectives of the National Planning Framework is for the majority of people to have no more than a 30-minute commute to work. Average commuting time for the State is currently 28 minutes thus devaluing the stated target for travelling to work. However, over 30% of the population have a daily commute of 30 minutes to an hour each way and 11% of the population facing a commute over one hour each way. The most extreme cases exist in the counties immediately bordering Dublin (Kildare, Meath and Wicklow) spend a minimum of two hours every day commuting. It is also particularly high in Laois, Offaly, Westmeath, Carlow and Cavan.

Ibec is broadly in favour to more competition rather than more regulation but given the pace of structural change in the bus system over the coming years through the BusConnects initiative, stability and continuity will be required to ensure effective bus services. With this in mind, Ibec is in favour of the pragmatic approach to direct award contracts taken by the NTA. We would like to acknowledge the improved performance of both bus companies over recent years with an increasing number of customers using the services. Their continued performance is crucial to limiting the negative effects of Ireland's dispersed development and urban sprawl.

People should be able to move within and between city regions easily and efficiently. High quality public transport systems are essential to a mobile and agile city-regions. Dublin's public bus networks form the backbone of its public transport system. In 2017, Dublin Bus carried over 136m passengers – more than half of all public transport passenger journeys in Ireland.¹ Nationally, Bus Éireann was responsible for over 31m passenger journeys last year.

¹ https://www.nationaltransport.ie/wp-content/uploads/2018/06/Bus_and_Rail_Statistics_2018.pdf

It is important that the services provided by Bus Éireann and Dublin Bus are backed up by rigorous state investment to ensure the needs of passengers are met, and that a reliable and efficient service can be provided. As reliability and efficiency improve, commuters are better disposed to using bus services. Successfully addressing intra and inter-urban connectivity requires a focus on modes of transport other than private vehicles. Ibec shares the NTA's vision for a shift away from private car dependency. High quality public transport options contribute to greater intermodal transport, leading to reduced congestion and shorter travel times.

Congestion and excessive commuting times are a symptom of an inadequate public transport systems. Congestion adds unnecessary time to the daily commute; from this there are real social and economic implications. A shift away from dependence on private vehicles and towards a more intermodal, public transport orientated approach will improve quality of life, increase the catchment areas for skills across the country, and reduce emissions – all contributing to sustainable economic growth.

We would welcome the opportunity to discuss any of the issues raised in more detail.

Yours Sincerely,

Neil Walker

Neil Walker,
Head of Infrastructure

NBRU Submission to the National Transport Authority

on

Proposals for Directly Award Public Transport contracts for PSO bus services from 2019

The NBRU remains implacably opposed to the privatisation of the jobs currently provided by State-owned Companies, in this case Bus Éireann.

Currently the State-owned Bus Companies pay on average anything between €41000 and €53000 per annum, depending on hours worked and shift-cycle.

Compare this to the PSO Contract awarded by the National Transport Authority to the UK Multinational, GoAhead, and the pittance paid to Bus Drivers of €14.50 per hour, or circa €28000 to €32000 in this Company.

For us, this is a State sponsored race to the bottom, yellow pack Labour being inserted into the Public Services salary paradigm.

Incidentally, the contract to GoAhead is valued at an eyewatering circa €172m for five years, taxpayer's money, most of which will wind its way to the Bank Accounts of the Shareholders of this Company, not, we repeat not, back into public transport.

Its worth noting that Go-Ahead is 83% owned by the stock market, any surplus on the €172 million will be paid out in dividends to the many Go-Ahead shareholders, unlike the excess monies that are generated by a truly integrated and publicly owned/ operated public transport system (Dublin Bus and Bus Éireann), which are reinvested (€15 million from Dublin Bus alone in 2017) back into public transport.

The NTA, rather than look to jurisdictions that have Social Clauses and/or, do not include Labour Costs when tendering, have chosen, it would appear, to go the London route, I.e. Labour is very much up for grabs when it comes to awarding Public Contracts.

Provision and Duplication of Public Transport Services

The National Transport Authority is now duplicating some of the duties mandated to the Board of CIE under the 1958 Transport Act. But At what cost to the tax payer?

Under the 1958 Transport Act CIE was given a mandate which states:

“7.— (1) It shall be the general duty of the Board to provide reasonable, efficient and economical transport services with due regard to safety of operation, the encouragement of national economic development and the maintenance of reasonable conditions of employment for its employees.”

We have come a long way since 1958; unfortunately, the journey travelled by our legislators has brought them to a place where progressiveness in terms of at least matching the intentions of their predecessors with regard to the rights of workers has been ignored.

Contrast the 1958 Transport Act, with its commitment to employees, to the legislative direction given to the NTA through the 2008 Dublin Transport Authority Act and the Public Transport Regulation Act 2009.

“10. In exercising its functions, the Authority shall seek to achieve the following objectives—

***(a) The development of an integrated transport system which
Contributes to environmental sustainability and social
Cohesion and promotes economic progress,***

***(b) The provision of a well-functioning, attractive, integrated
And safe public transport system for all users,”***

Social Clauses

**The two mandates are practically identical, save the omission of
maintenance of reasonable conditions of employment (1958 Transport Act).**

The downward pressure on employment conditions within the transport sector or “a race to the bottom” is the inevitable consequence.

One thing is for sure; €14.50 per hour is not a rate of pay consummate with professional bus driving.

Safety standards will be put at risk by having cheap labour behind the wheel of buses.

It should be noted that there is ample coverage for a competent authority (NTA) within EC NO. 1370/2007 to protect the working conditions of employees. It would however appear that no appetite exists within the NTA to include such protections. In the absence of this we can only deduce that the intention here is to drive down workers’ terms and conditions.

It is quite apparent that the National Transport Authority is free to impose conditions in tender documents which would guarantee that the Public Transport Industry would not suffer a “race to the bottom”. Failure to avail of

the legislation that is at the NTA's disposal only exposes the untruth that this whole process is about competition; it is essentially about driving down wages and conditions.

Recital 17 of Regulation (EC) No 1370/2007 states that ‘competent authorities are free to establish social and qualitative criteria in order to maintain and raise quality standards for public service obligations, for instance with regard to minimal working conditions, passenger rights, the needs of persons with reduced mobility, environmental protection, the security of passengers and employees as well as collective agreement obligations and other rules and agreements concerning workplaces and social protection at the place where the service is provided. In order to ensure transparent and comparable terms of competition between operators and to avert the risk of social dumping, competent authorities should be free to impose specific social and service quality standards.’

From 2002 to 2013, Bus Éireann put approximately €45m of its own funds into the CIE Group, effectively supplanting the Government as the main funder of public bus transport. This was done by the cross subsidising the PSO services with profits made from the commercial Expressway offering.

That ability to continue to support the PSO services was eradicated by the continued and unfettered issuing of commercial licences, leading to an oversupply of capacity along the motorway market, this in-turn has led to the NTA being forced to intervene and award additional PSO contracts to operate services once undertaken by Bus Eireann's commercial Expressway service in the non-motorway segment.

Compliance with legislation

All public transport bus companies should be subject to mandatory independent inspections by the WRC. Adherence to the 1997 Organisation Working Time Act is vigorously policed by the NBRU within the CIE Group, there is however, widespread anecdotal evidence (some empirical evidence has recently come to the fore through a number of Court cases) to suggest that rest periods and daily

working duty spreads are being flouted by companies operating in the sector, creating unsafe working conditions and possible skewed competition.

Cost to the State

According to the 2016 Census data the average family size within Ireland is 1.38 children.

The conditions of employment, i.e. €28,000 per year, contribute to such workers falling within the scope of the Welfare system.

Weekly Family payment, back to school allowances, medical cards and HAP's are some of the examples of State assistance.

Interestingly, the unemployment rate in November 2016 stood at 7.3%, in September 2018 it was 5.4%, a 2%-point drop, and whilst it is approaching the all time low recorded by the CSO of 3.9%, the social welfare budget continues to increase, in 2016 it was €19.8 billion, the budget for 2019 is forecast to be €20.5 billion, one has to wonder if the low-paid jobs in the Economy, such as the NTA facilitated GoAhead model are contributing to this increase?

Under the Central Bank rules the workers in Go-Ahead would qualify for a mortgage of €98,000. In the current housing bubble this is unsustainable.

CONCLUSION

- **It is our contention that the continuation of a Direct Award by a competent authority (NTA) to Bus Eireann in relation to their current activities is entirely compatible with EU Regulation 1370/2007**
- **Further fragmentation of the PSO networks would destabilise the structure of the public service obligation and undermine the security of both the service and the jobs associated with service provision**

- **Privatisation dictates that profit is King, while workers' conditions and service are secondary**
- **Staff at Bus Eireann have suffered considerable and significant reductions in their take-home pay, following the three-week Strike in 2017**
- **Tendering rarely achieves the promised savings, early savings are usually achieved on the backs of jobs, conditions and service**
- **There is a growing tide of opposition towards privatisation across Europe**
- **Increased costs to deliver the services will ultimately be borne by the taxpayer**
- **The hidden subvention to the State in the form of lower taxes/welfare benefits to lower paid workers should to be costed and highlighted.**
- **Investigation into compliance with the 1997 Organisation of Working Time Act needs to be undertaken immediately for all Commercial/PSO contracts to ensure the State has no liability.**
- **The NBRU position is that Public Transport should be publicly owned and operated with workers receiving reasonable conditions of employment.**



Submission by the

Coach Tourism and Transport Council of Ireland

On

**Proposals to Directly Award Contracts for Public Bus
Services from December 2019**

October 2018

Introduction

Coach Tourism and Transport Council

The Coach Tourism and Transport Council (CTTC) is the representative body for Ireland's coach touring companies and Ireland's private bus operators. The CTTC's members are experts in all types of coach hire and transport solutions, including: airport transfers, day tours, extended touring, incentive travel, golf tours, school transport and provision of scheduled services. In addition to specialising in long distance scheduled services, many of CTTC's members also operate licensed bus services in towns and cities throughout Ireland.

All CTTC members are family owned companies, with a combined fleet of over 1,500 coaches, employing over 3,500 people directly. The CTTC comments and makes representations regularly on matters of concern to its members such as public transport, school transport, the coach tourism sector and the tourist industry generally.

Opening Statement

The Coach Tourism and Transport Council (CTTC) welcome the opportunity to make this Submission on Proposals to Directly Award Contracts for the Provision of Bus Services in the Dublin Metropolitan region to Dublin Bus from December 2019. In addition, CTTC welcome the opportunity to submit its views on awarding direct contracts to Bus Éireann in December 2019 for the provision of public bus services outside the Dublin Region and to amend that contract in 2021 to reduce the services within that contract by 10% and provide the removed services through a separate contract through an open tender process.

The provision of good quality public bus services, which is properly integrated with all other forms of public transport, is a key component to economic growth, quality of life and acts as a conduit to the fundamental fabric of society in terms of access to work places, healthcare facilities and social amenities and provide an affordable alternative to commuters without access to a private car in rural and urban communities. While CTTC acknowledge that the National Transport Authority are governed by EEC Regulation 1370/2007, the Dublin Transport Authority Act 2008 and the Public



Transport Regulation Act 2009, the organisation is of the opinion that Contracts for its provision should take into account previous knowledge and experience of countries that supports the contention that competitive tendering for public bus services yields benefits.

A key element of the experience gained from the previous 10% tender process is that there needs to be a formulae whereby the vast majority of indigenous operators are not precluded from the tendering process, in order to benefit from their vast experience in providing Scheduled Route Licensed Services to the public on a daily basis.

Proposals to Directly Award Public Service Contracts to Dublin Bus in 2019

On examination of the documentation in relation to the above proposal, CTTC are disappointed with the Authority's proposed decision to directly award to Dublin Bus a new contract to operate public service obligation bus services in the Dublin area from December 2019. It is CTTC's contention that the continued adequacy of public services to which the contract relates would be best served by tendering out further services in the Dublin Metropolitan Area. Competitive tendering ensures a wider choice of operators and brings market forces to bear, potentially reducing cost of provision and allowing enhanced level of customer service quality and potentially greater flexibility. In addition, the presence of competition in the market allows for benchmarking of performance.

CTTC notes the concerns of the Authority, particularly in relation to the extent of change that would be brought about in the proposed BusConnects Programme within the next five years.

While the BusConnects project will involve significant challenges, particularly in relation to bus priority infrastructure, disruption to existing services and the introduction of potentially new routes, it is the view of CTTC that greater benefit would accrue by the Authority, indicating to potential bidders the potential scale and timeframe of these proposed changes. By not doing so, the Authority is solely dependent on one individual entity.

Proposals to Directly Award Public Service Contracts Outside of the Dublin Region to Bus Éireann in 2019

The Coach Tourism and Transport Council welcome the proposal from the National Transport Authority to amend the proposed contract to Bus Éireann in 2021 and to reduce the services within that contract by up to 10% and provide those services with a separate contract following an open tender process. Considering the importance of this contract in terms of delivering a vital transport lifeline to rural Ireland, CTTC questions the NTA rationale in awarding the majority of the PSO contracts to a company who, by the Authority's own admission in their Consultation paper, have provided substandard performance in the Dublin Commuter area, individual Eastern routes, and certain Regional cities.

In addition, given the fact that the company came close to bankruptcy in the recent past, coupled with the negative industrial relations in that period which resulted in the non - delivery of PSO services for a period of three weeks, consideration should have been given to the potential threat of further industrial unrest and potential accruing losses, bringing the company's long term viability and its ability to deliver into question.

Recommendations

1. A key obstacle to any further tendering process is the tender specification, as noted from the previous tender, whereby the financial criteria stipulated precluded the vast majority of indigenous operators from participating. Private operators currently provide a wide range of scheduled services to the general public in a cost efficient, safe and affordable manner, under contract to the NTA, without financial pre-condition. CTTC would recommend that the option to provide a designated bonding alternative be put in place to safeguard the State against non-delivery of service obligations in any future contracts.
2. As stated in the documentation, there is a distinct probability that new routes will be undertaken in Galway, Cork and Dublin as a result of service re-organisation through the Bus Connects programme. CTTC recommend that these additional services be put out to an open tender process.

3. The current position whereby Dublin Bus and Bus Éireann have sole ownership of the majority of bus depots, despite the fact that a large proportion of same have been upgraded and refurbished with public funds in the past, gives both these companies an unfair competitive advantage. In order to progress future tenders in a meaningful way, CTTC recommend that resources should be allocated for the provision of infrastructure for any future tenders.
4. CTTC recommends that consideration be given to amending the current legislation to reduce the duration of the PSO contract period to provide the Authority with greater flexibility in relation to future proposed changes as a result of BusConnects and other significant infrastructural changes during the period of said contracts.
5. CTTC recommends a fundamental review of the PSO position, as it is our contention that significant savings could be achieved through the use of small to medium high quality accessible vehicles which would connect from rural communities to mainstream commercial services in a “collect and connect” feeder system, thereby reducing the requirement for large State funded PSO vehicles, effectively running parallel with commercially viable services. The provision of such feeder services could be achieved through the extension of the Rural Transport Programme, by sub-contracting the proposed services through an open tender process, thus achieving greater flexibility, substantial cost savings and better quality of customer service.

Conclusion

While CTTC commends the Authority’s proposed initiative to place 10% of the Bus Éireann direct awards contract outside of Dublin out to tender by 2021, we are disappointed that a higher percentage of same will not be tendered. In addition, that fact there will be no further tendering of services in the Dublin region is very disappointing.

By granting the majority of PSO contracts to two companies, the Authority have limited control over costs of service provision which rose by 6% in the Dublin region and 9% outside of Dublin in the three years from 2015 to 2017.

It is the view of CTTC that additional tendering would have ensured greater certainty to the continued adequacy of public services as specified under Subsection 3a. Furthermore, a higher percentage of tendering would bring market forces to bear, potentially reducing the cost of provision, enhancing customer service quality and benchmarking of performance.

Response to Bus Contracts Tender for the period from 1st December 2019

Tender

1. There appears to be a confusing direction within the National Transport Authority (NTA) as to whether it wants to rubber stamp the status quo with the services provided by Dublin Bus, Bus Éireann or to enable private contractors to provide some or all of the services currently run by the existing operator.
2. This confusion is further compounded by the NTA's desire to implement the seriously flawed "Bus Connects" programme alongside the re-tendering process. While attempting to modernise the provision of Dublin centred bus services, there is a perception that the NTA is tripping over itself with internally competing mandates in the absence of clear leadership or clarity of thinking.

Real Time Information

3. The provision of this service is at best patchy with only a minority of bus stops having this facility. However, it is seriously demeaned by being inaccurate or not being in service. Either this service undergoes substantial improvement, or it should be scrapped to provide a better phone and internet-based service with real incentives/penalties for excellent/poor service. An independent contractor should be appointed to oversee this service in order to put the spotlight on the NTA and/or the bus service provider.

Integrated services with other transport types

4. There is a serious flaw in the NTA's thinking regarding transport integration. The NTA has clearly stated that services by bus will not be provided where these overlap with other transport modes. This is not a reality. There are no comparable services that match directly from one transport mode to the other except in very rare cases where transport links share the same terminus at one or both ends. This is not the provision of parallel services from a common-sense point of view. In any event, this type of thinking needs to be altered to provide a properly integrated suite of services so that there is a really joined up transport service that serves users fairly. This is especially needed should any version of the "Bus Connects" program ever come to fruition so that there are adequate facilities in terms of space, waiting areas, covered areas, sufficient bus parking facilities. Where bus services should integrate with train and Luas services, these must facilitate the smooth transfer of passengers from one mode to the other without excessive waiting times. Currently, buses do not integrate with other transport modes – in fact, the opposite is true as buses do not wait for the next train or Luas to connect but simply drive away to avoid picking up passengers. This should lead to the NTA being penalised until such integration is a proven reality.

Fares

5. Notwithstanding the NTA's weak and timid approach to re-balancing fares and applying increases that are in excess of inflation, there are serious distortions that have not been corrected with regard to the imbalance of outer suburban fares compared with short journey stages. In effect, longer journey users are subsidising those on short journeys. This is manifestly unfair and is not justified. An example is the cost of the 84X fare from Dublin city centre to Bray @ €2.15 and from the city centre to Greystones or Kilcoole which is €2.90, a difference of 75c or 35%. Fare adjustments should be put in place by the end of December 2018 to regularise this issue.

Transport for Ireland Brand

6. Does anyone in the NTA seriously believe that Transport for Ireland (TFI) is a brand? Do passengers give one whit if a bus is branded Dublin Bus or Bloggs' Buses? This is a case where group think has started to believe its own story. The latest round of colour changes does nothing to change services so put the paint sprayers away and improve the services first, please.

Bus Stops/Shelters

7. There is an urgent need to tidy up the proliferation of bus stops where there is more than one bus provider serving a common site. There should be a single bus stop with each provider having a slot on the stop. Bus stops should come under the direct control of the NTA without any input from local authorities, planning permission, bye law approvals and other unnecessary restrictions. Proper shelter provision has to be made in isolated areas with infrequent (> 30-minute intervals) and in particular, where interchange facilities are to be provided. Adequate provision for the disabled, elderly and young children needs to be part of this process.

Leap Cards

8. It is unclear why these cards have very restrictive use on the State's bus services and trains when some operators e.g. Wexford Bus are happy to accept them from destinations in Wexford? These should be capable of universal use on all providers of bus service irrespective of situation and route. There is simply no excuse for the NTA not to make the use of these cards nationwide without delay.

Bus Fleet renewal

9. While it is noted that post 2019, consideration will be made in acquiring buses with reduced emissions. For many years, zero and low emission buses have been in use in cities such as Vienna, Amsterdam and Copenhagen – so, it is unclear why there needs to further evaluation of proven technologies. As the fleet will have to increased to meet the extra demands put upon it, low/zero emission buses should be acquired without further delay and the older more polluting buses in the fleet be confined to minor routes and as backups or extras when required.

Routes selected for the tender process

10. It is unclear how the process of route selection is made regarding routes that are earmarked for tendering. One Bus Éireann route from Wicklow to Dublin Airport and return which is number 133 is an example of a very poorly run route which should be significantly improved before going for consideration to tender. It is very erratic with missed services, drivers not knowing the route, poorly maintained buses. This needs to be perfected before assigning it to tender.

Summary

11. The NTA has a lot to do to ensure that all of the above mentioned issues are part of the tender process with effects on bus operators and the NTA itself. Clarity needs to be provided as to the precise role of the NTA (is it a procurer; is it a regulator; is it a consumer champion – just what is the role of the NTA?)

Alan Richardson

[REDACTED]
[REDACTED]
[REDACTED]
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**Bus Contracts
National Transport Authority
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Iveagh Court
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Dublin
D02WT20**

By Email: 2019buscontracts@nationaltransport.ie

2nd November 2018

Re. Submission to the National Transport Authority (NTA) on the Bus Éireann Direct Award Contracts

Dear Sir/ Madam

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the NTA public consultation process relating to their proposal to enter into another direct award contract with Bus Éireann in 2019.

At present In Ireland, the tourism and hospitality sector supports in the region of 220,000 jobs. Overseas visitors contributed an estimated €5 billion to the national economy in 2017. Domestic tourism expenditure is estimated at €1.9 billion. This total out-of-state and domestic tourism expenditure represents in the region of 4.0% of GNP in revenue terms. As the National Tourism Development Authority, Fáilte Ireland's role is to support the tourism industry and work to sustain Ireland as a high-quality and competitive tourism destination. In doing so, its chief aim is "*grow the economic and social contribution of tourism to Ireland through sustainable tourism development*".

Internationally, and in Ireland, as is reflected within the supporting consultation documentation (*Performance Report on Current Bus Éireann Direct Award Contract* and the *Performance Report on Current Dublin Bus Direct Award Contract* - where passenger numbers increased by 3% and 14% respectively over the period 2015-2017), greater numbers of people are using public transport. In addition to those figures, overseas tourism to Ireland has seen steady growth since 2011 with a 10% jump in 2017 on 2016 figures alone.

There is a fundamental link between tourism and many other sectors (including transport), which needs to be acknowledged, and which should result in an increase in the level of integrated policy and strategy cross-compliance, and the consideration of potential cross-sectoral benefits, as well as the impacts on tourism in the development of policy, strategy or implementation. The tourism sector does not directly own or manage the tourism assets which underpin the sector, and therefore is reliant on this cross-sectoral alignment for the sustainability of the sector.

Public access and transport are thus seen as vital to enabling tourist movement and transit to and between Ireland's key tourism destinations and heritage attractions and positively addressing the ongoing challenge of regional spread of visitors throughout Ireland. Therefore, a high degree of policy, strategy, and implementation convergence between the tourism and transport sectors is crucial.

Thus, public transport plays a critical public service by serving and sustaining the quality, competitiveness and attractiveness of the tourism offering within the regions which are served by Bus Éireann.

For these reasons it is important that Fáilte Ireland should take every opportunity to avail of opportunities for public consultation about public transport provision in order to raise awareness, and to make specific observations about the need for reliable, regular and appropriate public transportation arrangements to key destinations - both for the benefit of visitors and for those employed in the hospitality sectors.

Consultation Paper by Bus Éireann

It is noted from the Consultation Paper, that *'The objectives of the Authority in entering into any public bus services contract are to:*

- i. Ensure the provision of high quality and accessible bus services at best value for money to the Exchequer;*
- ii. Enable strong monitoring of, and enforcement of compliance by, the contracted operators with the terms of their contracts;*
- iii. Improve the customer experience of public transport;*
- iv. Ensure public transport integration is not compromised; and*
- v. Be compliant with the Dublin Transport Authority Act 2008, the Public Transport Regulation Act 2009, EC Regulation 1370/2007 and EU procurement requirements.'*

It is noteworthy that in the last 10% tendering activity, both competitions for Waterford and the Dublin commuter services attracted high levels of interest and tenders. This fact, and the submissions made to the NTA under the last similar such Direct Award Contract public consultation process, indicate that there is substantial interest and potentially viable

alternative/ additional operators and services which could replace and/ or support existing services. It is therefore welcomed that the NTA is cognisant of the need for an improved quality of service provision in terms of reliability and punctuality, by Bus Éireann.

Existing Bus Éireann initiatives should be extended to provide public transport 'hop-on hop-off' services which operate between visitor attractions and key tourism assets (e.g. Greenways, trailheads etc.) and not just between towns and villages (as is reflected at: <http://www.buseireann.ie/pdf/1467038937-Irelands-Ancient-East.pdf>, and <http://www.buseireann.ie/pdf/1489050252-Wild Atlantic Way.pdf>, and should be supported where possible.

Public Transport & Tourism in Ireland

The ITIC paper, *A Review of Public Transport & Tourism in Ireland*, published in June 2016, identifies that there are opportunities “for public transport operators to grow their business from tourists by adopting 3 primary strategies:

- Service improvements
- More effective pricing
- Improved Promotion”.

In respect of the above, a number of recommendations are advocated as to how increased use of public transport by tourists could be encouraged, including:

- “Agree and establish forms of measurement with regard to tourists’ utilization of public transport and monitor on an ongoing basis;
- Improved promotion of scheduled services to visitors by operators and state agencies;
- Encourage rural (and other) transport operators to integrate scheduled services with key tourism facilities during peak season;
- Promote scheduled services to tourists as short break products, particularly with a focus on securing regional spread;
- Promote scheduled services, individually and as part of a bundle, to tourism segments that have the greatest potential to use such services. More looped regional transport routes would help alleviate the need to return to Dublin’s key bus or rail stations;
- Develop a number of themed experiences for visitors, based on scheduled services;
- All future investment in public transport and planning to take account of tourists needs”.

Previous Fáilte Ireland Submissions relating to planning and transport in the Region

Fáilte Ireland previously prepared submissions to the Draft Regional Spatial and Economic Strategies, which states the following regarding *Public Transport (provided by State and private operators)*:

International tourists visiting here expect a high-quality transport system. A good transport system is a key enabler to creating a great tourist experience. Public access and transport are vital to enabling tourist movement and transit to and between our key tourism destinations and heritage attractions. For the most part, Fáilte Ireland and the tourism industry have no control over where our major heritage attractions are located. However, for tourists to experience these, accessibility is key. Therefore, a high degree of policy convergence between the tourism and transport sectors is crucial.

Initiatives that increase access to tourist attractions and activities must be encouraged. For example:

- Public transport ‘hop-on-hop-off’ services that are tourist-centric and operate between attractions and not just between towns and villages;
- The development of a number of local transport management plans for destination towns currently experiencing traffic-congestion issues;
- Establishing good public transport infrastructure in our natural landscape destinations. These areas have either very poor tourist numbers for the quality of the asset or have traffic problems at peak tourism times. This can lead to tourists having a poor experience or, worse, not visiting at all if word of mouth is unfavorable. Public transport has a key role to play in addressing these issues and opening up access to the abundance of natural assets. In addition, provision of off-road links (walking and cycling), from the terminuses of the public transport connections to these natural amenities, would not only improve access, it would actually enhance the tourist experience.

The submission to the draft Regional Strategy also draws attention for the need for *Access to the Countryside and Coastal Areas*. A key motivator for our visitors in choosing to come to Ireland is our landscape and scenery, and access to this is imperative to support the work that Fáilte Ireland, tourism stakeholders and the industry is undertaking to both maintain and grow the tourism sector in Ireland. In the last number of years Ireland has seen the development of a number of greenways and blueways across the country which provides increased access to Ireland’s countryside, rivers, lakes and coastline. These developments are very welcome, but the quantity, variety and indeed investment at a national level in these assets lags well behind our competitor and indeed best in class destinations.

Access to the countryside and coastal areas can be poor in many areas for a number of reasons, including landowner issues, insurance, planning, a perceived conflict in business activities, etc. Increased access to our shoreline and countryside is required, be it through existing or new infrastructure, or by establishing new ways of working so that public resources can be shared with private enterprises.

The submission also describes *The Dynamic Nature of Tourism – a Challenge to Planning*. It outlines that tourism is an activity that presents challenges to traditional spatial planning

concepts that associate a particular use to a particular place. Tourism has a dynamic nature. A visitor may visit many places in different regions of Ireland during a single visit. Indeed, the activity of tourism itself consists of moving from place to place.

Tourism is also an increasingly self-directed activity. Visitors choose where they wish to go and what they wish to do. These can be subject to change over time.

Because of the dynamic and mobile nature of tourism, regional planning needs to play close attention to linkages and inter-dependencies in tourism. In particular, it is important to take account of the reality that places where people visit may be in different places from where they overnight.

An emerging feature of Ireland's tourism is the growth of day trips from Dublin to rural areas – increasingly as far as the west coast. This change has been facilitated by the maturing motorway network and is compounded by lack of public transport services to these locations. This presents further challenges with regard to dwell time of visitors in rural and peripheral areas and the resulting economic benefit to rural areas.

Furthermore, the submission to the regional strategies describes the *Needs of Future Tourism– Challenges to be Overcome*.

As with all sectors, the tourism sector faces a number of challenges. It is important for plans, strategies and active operational services linked to tourism to anticipate and accommodate issues which may arise as a result of these challenges, as there is growing evidence that a failure to anticipate, accept and deal with tourism-related adverse effects can give rise to significant harm to visitor numbers and earnings. Fortunately, most of the solutions to these issues can be readily dealt with by monitoring and early identification of emerging problems.

The submission specifically highlights the issues of Congestion and Public Transport.

In terms of Congestion there is a need to include provision for monitoring road and destination traffic, identify emerging bottlenecks, identify and implement, short and long-term solutions, and the prioritising of funding. The identification of alternative and seasonal routes for public transport is also considered important by Fáilte Ireland in order to both address congestion whilst also enabling tourists to access areas and attractions with greater ease and efficiency.

Fáilte Ireland would also encourage public transport providers to coordinate with other activities, land-uses and actors (also including other transport providers) in order to best serve attraction areas, and also make integrated plans based on scenarios of different rates and levels of growth. Engagement with local communities, land-use and transportation planners to provide sufficient services to areas of high demand will also be pivotal in increasing accessibility to prime tourism destinations.

The following recommendations regarding transport and key Infrastructure were made for inclusion into the Regional Spatial and Economic Strategies:

- Facilitation of capacity at major regional air, rail and public bus transport access points
- Facilitate monitoring for the identification of emerging or future capacity shortfall in order to ensure timely provision of new capacity – especially for key sectors such as transportation.
- Facilitate and co-ordinate improved seasonal public transport provision between tourism hubs and rural amenities.
- Integration of rural access and transportation provision for forestry, fishery, energy and agriculture with the provision routes and access for new walking, cycling and water sports routes and facilities.
- Facilitate greater access to both public transport and trail infrastructure for walking, cycling, watersports etc.
- Explore opportunities for shared provision of public transport access at designated key rural sites for target activities – including walking, cycling, water sports, golf
- Include provisions for improving infrastructure to help visitors get around and to navigate easily, to open regional opportunities. Local area transport plans that support both ‘always on’ and ‘seasonal’ destination towns and access to attractions and activities are a key priority.
- Include provision for monitoring road and destination traffic, identify emerging bottlenecks, identify and implement, short and long-term solutions, prioritise funding.
- Identify alternative and seasonal routes, and interim/ temporary traffic management solutions
- Establish a framework and ensure the co-ordination of the provision, management and funding of supporting infrastructure – especially for transportation, to achieve multi-party use and sharing of infrastructure.
- Ensure further readily available and ease of access to transport information (e.g. bus schedules) available to tourists through various means (online, apps, information leaflets), particularly at major transport points (e.g. airports, rail stations, ports).

Conclusion

It is very important to include the support and facilitation of tourism by public transport as a public service.

It is necessary to provide a consistent platform of information and tools to support the visitor in exploring the Country.

There is a need for integrated ticketing between public transport offerings and active promotion of multi-modal transport.

The service is provided both to the visitors themselves and, of equal importance, to those employed in the hospitality sectors, who are often critically dependent upon public transport, often at times at the very beginning and end of the working day.

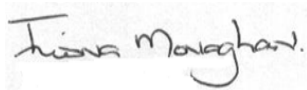
Consideration of whether to retain or remove future contracts should take account of the need to retain service levels and routes that meet the needs of the tourism Sector. Appendix 1 provides an overview of existing Bus Éireann Routes with Tourism Roles.

Of the Services under consideration for removal from Contract in 2021, it should be noted that Route 101 serves important tourism resources such as Bray, Wicklow, Rathdrum, Avoca - which provides important access to yeast Wicklow Uplands and Wicklow Town.

Fáilte Ireland welcomes the opportunity to review the consultation paper for the Proposal to Directly Award a Public Bus Service Contract to Bus Éireann in 2019.

Please do not hesitate to contact us if you have any further queries or questions.

Yours sincerely,



Fiona Monaghan

Head of Activities, Fáilte Ireland

Appendix 1 Bus Eireann Routes with Tourism Roles

Existing Regional City Services with important tourism roles include

Cork City

226 Cork Railway Station - Cork City Bus Station - Cork Airport - Kinsale

226A Cork Railway Station - Cork City Bus Station - Airport Business Park -

Cork Airport

Regional Town Services with important tourism roles include

Sligo

S1 Cartron – Sligo IT – Town Centre – Caltragh Road

S2 Strandhill – Bus/Rail Station – Town Centre – Sligo IT – Rosses Point

Stage Carriage Services with important tourism roles include

65 Galway - Athlone - Longford - Cavan - Monaghan - Belfast

70 Galway - Athlone - Mullingar - Dundalk

236 Cork - Dunmanway - Bantry - Glengarriff - Castletownbere

237 Cork - Clonakilty - Skibbereen - Goleen

239 Cork - Bandon - Courtmacsherry - Butlerstown

240 Cork - Cloyne - Ballycotton

241 Cork - Midleton - Whitegate - Trabolgan

252 Cork - Cork Airport - Skibbereen - Glengarriff - Kenmare

257 Macroom - Millstreet - Killarney

258 Macroom - Rylane Lower

259 Macroom - Renanirree

260 Cork - Youghal - Ardmore

261 Cork - Midleton - Ballinacurra

270 Sneem - Kenmare - Killarney

271 Tralee - Castleisland - Kerry Airport - Killarney

272 Tralee - Listowel - Ballybunion

273 Tralee - Cloghane

274 Tralee - Ballyheigue

275 Tralee - Dingle

275A Dingle - Ballyferriter - Dunquin/Gallarus - Ballydavid

276 Killarney - Inch - Dingle

278 Tralee - Fenit

279 Tralee - Killorglin

279A Killarney - Killorglin - Caherciveen - Waterville

282 Ring of Beara/Kenmare - Ardgroom

284 Tralee - Farranfore - Killarney

333 Ennis - Miltown Malbay - Doonbeg

334 Crosses of Annagh - Kilmaley - Ennis

336 Limerick - Ennis - Kilrush - Kilkee

348 Scariff - Flagmount - Feakle - Tulla - Ennis

349 Scariff - Feakle - Gort

350 Galway - Kinvara - Doolin - Cliffs of Moher - Ennis

360 Waterford - Tramore

362 Waterford - Dungarvan

365 Waterford - Thomastown

366 Waterford - Dungarvan - Cappoquin - Lismore

370 Waterford - New Ross - Duncannon - Wexford

385 Wexford - Rosslare Strand - Rosslare Europort

417 Galway - Tuam (Summary Timetable)

419 Galway – Clifden (Winter Timetable)

424 Galway - Spiddal - Carraroe - Lettermullen

454 Ballina - Crossmolina - Lahardane - Castlebar - Westport

480 Derry - Donegal - Ballyshannon - Sligo

486 Lough Derg Services (Summer Service)

492 Donegal - Glenties - Dungloe

NDA submission on

Proposal to directly award a Public Bus Service Contract to Bus Éireann in 2019

Introduction

The National Disability Authority (NDA) is the independent state body providing expert advice on disability policy and practice to the government and the public sector, and promoting Universal Design in Ireland.

The NDA is pleased to be invited to make a submission to the National Transport Authority (NTA)'s proposal to directly award a Public Bus Service Contract to Bus Éireann in 2019. Our submission contains the following key points.

Positive Developments

As part of our submission, the NDA recognises that the National Transport Authority (NTA) and Bus Éireann are focused on meeting their commitments under the UN Convention and the National Disability Inclusion Strategy 2017 – 2021 to develop and implement integrated universally designed public transport services. The NDA is also aware that the NTA and Bus Éireann have implemented and are in the process of implementing some actions to improve the accessibility of their services. Some of these key actions have included:

- Focusing on increasing the number of services that are wheelchair accessible. Currently 86% of their services are wheelchair accessible.
- Bus drivers receive training in disability awareness
- Bus Éireann in consultation with their Disability User group are developing a process to assess powered wheelchairs and mobility scooters and where possible to increase the number of these wheelchairs and scooters that can be carried on Bus Éireann services
- It is envisaged that the 40 new coaches providing an inter urban service that will be introduced in the first half of 2019 to replace the existing 12m high coaches will not be operated on a 24hr pre-booking but more like a city bus where the wheelchair will be taken on-board at a bus stop. The NDA has advised the NTA and Bus Éireann that the requirement for 24 hr advance notices limits people with disabilities in their rights to get around. The NDA

is pleased to note that Bus Éireann are considering the issue of coach design regarding the future procurement of vehicles

The NDA notes the NTA's proposal to directly award the Public Bus Service Contract to the Bus Éireann. A direct award contract is one awarded to an operator without competitive tendering, as permissible under national¹ and European Union legislation². The NDA welcomes this proposal because it will ensure that there is no disruption regarding the provision of current bus services to persons with disabilities. This proposal also provides Bus Éireann with the opportunity to progress work on increasing the accessibility of their services. However, the NDA advises that the awarding of this contract should be subject to the delivery of Bus Éireann's commitments to developing and delivering integrated universally designed public transport services. It would be helpful for the next Public Service Contract (2019 – 2024) if Bus Eiermann had clear Key Performance Indicators and time frames for addressing a number of key barriers that prevent the service from being easily accessed by everyone regardless of age, size, ability or disability.

Addressing Key Issues

The NDA advises that the following issues need to be addressed in order for Bus Éireann to provide integrated universally designed services:

- The number of accessible routes around the country is limited due to constraints regarding accessible bus stops. Bus Éireann currently have 5 regional coach services that are accessible. Many of Bus Éireann's bus stops throughout the country are not designed to accommodate wheelchair lifts which means people with reduced mobility cannot get on or off the buses. The NDA advises that the NTA and Bus Éireann should continue to work with the local authorities and the NDA to develop and implement universally designed bus stops across the country. This will increase the number of accessible routes that Bus Éireann can provide across the country. The NDA also advises that Fáilte Ireland should also be included in this process so that they can promote the accessibility of Bus Éireann services to visitors and tourists.

¹ **Dublin Transport Authority Act 2008 (DTA Act)** and the **Public Transport Regulation Act 2009 (PTR Act)**.

² **EC Regulation 1370/2007 – on public passenger transport services by rail and by road** was adopted. The Regulation creates a framework regulating how Member States award exclusive rights and pay compensation for transport services which include Public Service Obligations (PSO).

- Bus Éireann currently has English and Irish Next stop announcements recorded and set up for 550 out of 5,300 stops in the Automated Vehicle Location (AVL) system. A universally designed bus service is one that is accessible to everyone. It is crucial that the remaining next stop announcements are implemented as soon as possible so that clear information on transport destinations and health and safety procedures are provided to all passengers including older people, persons with intellectual disabilities, persons with autism spectrum disorder, persons with visual impairments, visitors and tourists. These systems should be operational at all times. Bus Éireann also needs to ensure that all their fleets have fully operational visual announcements to ensure that all passengers but especially passengers with hearing impairments are aware of travel and other announcements.
- The NDA advises that the NTA and Bus Éireann need to consult with a diverse range of users to ensure that the bus livery and the design of the 40 new inter –urban buses that are being rolled out in 2019 are universally designed. In July 2018, the NDA and the NTA hosted a very productive consultation session on the bus livery and the design of the Go Ahead buses. The NDA would be happy to facilitate a consultation with Bus Éireann and the NTA on this issue. The NDA has included key points on bus livery and design in Appendix A of this document
- It is crucial that staff across all aspects of Bus Éireann’s services are trained in disability equality and disability awareness so that they can provide appropriate assistance to people with different disabilities and ensure they meet their support needs. It is also important that staff are trained in health and safety matters and in providing emergency evacuation procedures for people with disabilities
- It is important that Bus Eireann’s website is universally designed and that it complies with the accessibility criteria laid out in the EU Directive on Web Accessibility 2016/2102. This Directive will be implemented in Irish law at a future date and will cover all public sector websites. Government Departments and related agencies will be required to prepare an accessibility statement on potential deviations from the criteria. The NDA is working closely with the Department of Communications, Climate Action and the Environment on the implementation of this Directive in Ireland.

Tendering Services

The NDA notes in this proposal that the NTA has conducted research on international practices and experience regarding the tendering of public transport

services. The NTA therefore considers that tendering in the order of up to 10% of the services would encourage good competition at tender stage and would provide a satisfactorily sized operation for on-going benchmarking with Bus Éireann.

The NTA is proposing that it will tender a 10% portion of the public bus service market outside Dublin in 2019/2020 with the target of a contract for those services being in place from 2021 onwards.

The NDA notes that these new service providers will be managed by the NTA, that they will have to meet the criteria of the Public Service Contract and that they will have to submit quarterly reports into the NTA on their performance.

However, the NDA advises that if the NTA is going to tender 10% of these services that it consults with a wide range of services users, including older people and persons with different disabilities, in order to guide on the service design requirements, before selecting the final contractor and awarding the final contract. This consultation process is crucial to ensuring that the bus livery and the exterior and the interior design of the buses provide by this contractor are universally designed. It is also essential that senior management and the staff employed by the contractor commit to providing universally designed services and that they have the policies and processes in place to deliver these type of services. A key part of this service delivery is ensuring that all staff including senior management, customer service staff and bus drivers are trained in disability awareness so that they have the commitment and the skills to provide services and supports to persons with disabilities.

Appendix A

NDA's Advice regarding bus livery and design for new fleet of Bus Éireann's Buses

- Ensuring that the colour yellow is incorporated into the front, sides and the back of the livery of the new buses, so that the entire bus is visible and recognisable to tourists, older people and persons with different disabilities
- Changing the colour of the following items in the interior of the buses to make them more visible and recognisable to all passengers, including tourists, older people and persons with different disabilities, so that:
 - The headrests on the back of the seats should be yellow.
 - All hand and grab rails in the buses should be yellow in colour.
- Using accessible fonts such as Verdana or Helvetica for the numbers and the bus destinations on the front, back and sides of all the buses and for signs in the interior of the buses. These types of font will make it easier for older people, tourists and people with different disabilities to read this type of information. The **Customer Communications Toolkit for the Public Service – A Universal Design Approach** contains useful information on accessible fonts, signage and producing universally designed communications in a multimedia environment. This toolkit was produced by the Department of Public Expenditure and Reform and the NDA's Centre for Excellence in Universal Design. A copy of the publication is enclosed.
- Using colour contrasting for all signs on the interior of the buses to ensure that they are visible and recognisable to all passengers including persons with different disabilities. Colour contrast is where signs use a dark background with white text or vice versa. See the **Customer Communications Toolkit** for more details.
- Signs in the interior of the buses are written in Plain English so that they are accessible to different customers including persons with autism spectrum disorders, persons with intellectual disabilities, person with literacy difficulties, tourists etc.
- Placing a large button with Stop written in large text on the poles that are situated beside the first seats behind the stairway on the double decker buses. Older people, tourists and persons with different disabilities can detect this button and push it thereby letting the bus drivers know that they need to get off at the next bus stop.

- Using thicker non slip material for the ramps on the buses to ensure that they do not get slippery in rainy weather. This will make it easier for persons using powered wheelchairs to get on and off the bus as the wheels of their chairs will be able to get traction on the ramp.

National Transport Authority
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By email to: 2019buscontracts@nationaltransport.ie

6 November 2018

Dear Sir/Madam,

I refer to correspondence to Isolde Goggin regarding the public consultation issued by the National Transport Authority (NTA) on its proposals to directly award two public bus services contracts; one in the Dublin region to Dublin Bus and one outside the Dublin region to Bus Éireann.

We understand that in the Dublin region, the NTA is proposing to enter into a further direct award contract with Dublin Bus from 1 December 2019 to 30 November 2024. Dublin Bus was previously awarded a direct award contract which had a provision to remove approximately 10% of services from the direct award contract and award them to a provider through a competitive tender process.

We understand that outside Dublin, the NTA is proposing to enter into a further direct award contract with Bus Éireann, which will allow for the competitive tendering of 10% of the routes awarded to Bus Éireann (mainly Dublin commuter routes), leaving Bus Éireann with 90% of the remaining market.

The proposals continue the approach taken by NTA since 2014 in terms of the level of competitive tendering being introduced in Ireland. It is regrettable that the proposals for 2019 to 2024 will not provide for further competitive tendering in these markets.

We also note however that the NTA reserves the option to competitively tender certain services in Cork and Galway, following a major reorganisation of the bus network for implementation in 2020, if the ability of Bus Éireann to meet required performance standards is in doubt.

One of the CCPC's legacy organisations, the Competition Authority, previously advocated for the introduction of competitive tendering for public service obligation (PSO) bus

services within and outside of the Dublin region. It was first recommended in the Competition Authority's 1999 report on the Bus and Rail Passenger Transport Sector. The Government accepted this recommendation in principle and the Dublin Transport Authority Act 2008 and the Transport Regulation Act 2009 included provisions to help facilitate the introduction of competition in the provision of PSO bus services.

In 2013 the Competition Authority provided a submission to the NTA consultation on the direct award contracts that are currently in place for Dublin Bus and Bus Éireann services from 2014. That response detailed the benefits of competitive tendering, compared to direct award contract, and outlined some practical issues associated with implementing competitive tendering. It concluded that *"the competitive tender procedure can actually give the NTA greater power and a stronger framework to achieve [its] goals than a Direct Award contract"*. This was reflected in the current NTA consultation papers which acknowledged that a move to competitive tender enhances value for money and customer service levels.

The CCPC supports the principle of opening up bus routes in a manner that provides for effective regulatory oversight from a competition perspective, where the tender process is designed in a manner that can deliver improvements in quality, reliability and punctuality by operators for consumers.

The CCPC also supports the NTA's proposal that *"The Authority will maintain a fairly tight contractual specification of required service (routes, frequencies and so forth)"*. The Competition Authority's 2013 submission stated that *"Clear contracting terms and monitoring schemes for evaluating the performance delivered in exchange for public funds is vital during the process of competitive tendering"*. We welcome the fact that this issue been highlighted by the NTA. Inadequate service specification, effective collusion during the tendering process and poor ex-post control on contract execution can lead to fewer and fewer bidders over time. In this regard, anti-competitive practices in relation to bid rigging are a concern generally for the CCPC and we are actively working with public bodies to raise awareness of the potential for bid rigging in procurement, and produced resources to assist businesses¹.

We acknowledge that the NTA supports competition and its benefit for consumers. As stated in the consultation papers, *"the clear finding of the literature is that enhanced value for money is available through a move to competitive tendering"* and, *"A further*

¹ <https://www.ccpc.ie/business/help-for-business/guidelines-for-business/bid-rigging-what-you-need-to-know/>

benefit put forward for moving to competitive tendering relates to the potential for enhanced customer service levels". The CCPC continues to hold the view that opening up the public bus market within and outside of the Dublin region, through competition, benefits consumers and businesses.

The CCPC would urge further consideration to be given to the ways in which greater competition can be facilitated and we would welcome the opportunity to discuss these matters with the NTA.

Yours sincerely



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Communications & Policy

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01 [REDACTED] [REDACTED]

7 November 2018.

Ms. Ann Graham
Chief Executive Officer
National Transport Authority
Dún Scéine
Harcourt Lane
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D02 WT20.

Re: Consultation on proposals to directly award contracts for public services from December 2019.

Dear Ms. Graham

I refer to your letter of the 5 October 2018 to Patricia King inviting Congress to submit views on the Authority's proposals to enter into new direct award contracts with Dublin Bus and Bus Éireann for a five-year period commencing in December 2019.

Could I begin by apologising for the delay in responding to your invitation - it was not possible to complete our internal consultation process by the closing date of the 30 October 2018.

Congress as you will be aware is the largest civil society organisation on the island of Ireland representing close to 800,000 workers. Our affiliated unions represent workers who are employed by Dublin Bus and Bus Éireann and thousands of our members are users of the excellent services provided by these companies.

We have carefully studied the proposals for the 'direct award contracts' from December 2019 and we would like to make the following observations for the Authority's consideration:

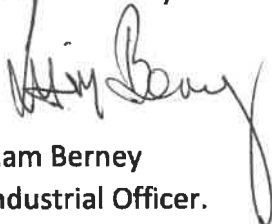
- In the case of Dublin Bus, the Authority is proposing that the bus routes and service levels included in the December 2019 contract will match the current Dublin Bus network at that time. However, the Authority in awarding the contract, proposes to reserve the right to tender an unspecified number of routes once the planned re-organisation of the Dublin Bus Network (Bus Connects) has been completed. Given the scale of the proposed re-organisation of the Dublin Bus network (Bus Connects), any decision to tender services in the middle of a direct award contract has the potential to destabilise the financial position and operational capacity of Dublin Bus;

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- In the case of Bus Éireann, the Authority is proposing to amend the current contract to reduce the services within those contracts by approximately 10% and to provide the removed services through contracts following an open tender process from 2021. The Authority has identified eight routes which they propose to tender and these are routes which form part of the Dublin Commuter service operated by Bus Éireann;
- One of the purported benefits of tendering of public transport services is that it can result in significant improvements. Proponents of tendering claim that it results in improved customer experience and better value for money for the taxpayer. As part of the current consultation, the Authority has published a performance report on the current Bus Éireann Direct Award Contract. As part of this report, the performance of Bus Éireann against punctuality and reliability metrics for 2015, 2016 and 2017 is measured. A closer examination of this data will show that the Bus Éireann Dublin Commuter Services matched or exceeded the target performance levels. It is reasonable, therefore, to question the rationale for the selection of Bus Éireann Dublin Commuter Services for tendering in 2021;
- The consultation document relating to the award of a revised contract to Bus Éireann from December 2019 also points to the recent financial difficulties in Bus Éireann. The Authority notes the work to stabilise the financial position of the company. In light of this, it seems to us reckless to propose to remove further service from Bus Éireann. In our view, to do so will damage the financial position of Bus Éireann and undermine its operational capacity. It could possibly precipitate another financial crisis at the company.

Congress does not support the contention that competitive tendering automatically leads to better public services. There is strong international evidence to show that it is often used as a means of driving down terms and conditions of employment and lowering standards. Public procurement should be a tool that is deployed in such a way that it delivers the best outcomes for those who rely on services and those who work to ensure the delivery. Congress is not convinced, and we do not believe, that evidence presented in the documentation supports increased tendering. Therefore, we would encourage the Authority to reconsider this aspect of its proposal.

Yours sincerely



Liam Berney
Industrial Officer.