

CONSULTATION RESPONSE FORM

DRAFT SPECIFICATIONS FOR A NATIONAL CONCESSIONARY BUS TRAVEL PASS FOR OLDER AND DISABLED PEOPLE IN ENGLAND

PART 1 - Information about you

| | |
|---|---|
| Name | John Bark |
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| Company Name or Organisation (if applicable) | SmartCard Networking Forum |
| Please tick one box from the list below that best describes you /your company or organisation. | |
| <input type="checkbox"/> | Small to Medium Enterprise (up to 50 employees) |
| <input type="checkbox"/> | Large Company |
| <input checked="" type="checkbox"/> | Representative Organisation |
| <input type="checkbox"/> | Trade Union |
| <input type="checkbox"/> | Interest Group |
| <input type="checkbox"/> | Local Government |
| <input type="checkbox"/> | Central Government |
| <input type="checkbox"/> | Police |
| <input type="checkbox"/> | Member of the public |
| <input type="checkbox"/> | Other (please describe): |
| If you are responding on behalf of an organisation or interest group how many members do you have and how did you obtain the views of your members: 647 E-mail, Bulletin Board and workshops | |
| If you would like your response or personal details to be treated confidentially please explain why: | |

PART 2 - Your Comments

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| 1. Do you agree that the design is clearly identifiable? | Yes x <input type="checkbox"/> | No <input type="checkbox"/> |
| Please explain your reasons and add any additional comments you wish to make: Yes, it is clearly identifiable, but the busy card front could be simplified to ease pressure on space. It would, however, make sense to include a logo which tied in the Freedom Pass stickers for easier identification | | |

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| 2. Do you consider a hologram or a laminate overlay appropriate security features? | Yes <input type="checkbox"/> | No x <input type="checkbox"/> |
| Given the increased value of the free concessionary pass, there is greater incentive for counterfeit cards to be created and used in areas without smart card readers. A laminate and hologram provide only limited additional security when cards are inspected from behind a security screen and enclosed in a cardholder. It is recommended that additional measures are introduced including handheld card readers carried by roaming inspectors. | | |

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| 3. Do you have any further comments to make about the pass design? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
| <p>The card design leaves very limited space for local authority information and markings. Accepting the need for a degree of uniformity, including the size, specification and placement of photographs, logos, etc, we feel that greater allowance could be made for local branding and already established functions, services and activities. If a logo sticker is acceptable for London cards, then the same argument could be made for other passes. The desire for uniformity (from a service provider perspective), is clearly understood, but there is also a need to balance this against the customer benefits from flexible use of a multi-function card. Perhaps a standard (secure) logo in a standard position would be adequate.</p> <p>If photo data is to be collected urgently then details of quality, format, etc need to be specified as soon as possible to avoid the need for re-working. If it is proposed to be prescriptive, what standards are being proposed? (eg the photograph definitions used by the Passport service).</p> <p>Card numbering and the number shown of the card is a potential area of conflict when multi-function cards are being considered. What is the significance of the 18 digit pass number and how is it planned to be used? Having more than one number printed on a card has been tried and generally causes customer confusion.</p> <p>In addition to this, it is helpful, particularly to the target audience for this product, if the card number and helpline number are close together on the card (ie on the same side).</p> <p>Finally, if dual interface cards are to be supported, the contact interface location needs to be considered when placing logos, photos etc.</p> | | |

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| 4. Do you agree that the passes should have an expiry date? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
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Yes, however this will force re-issue while the card is still within life.

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| 5. Do you agree that the maximum expiry date should be no more than five years from the date of issue? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
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Yes, this is beyond the normal limit of life of a card in regular use.

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| 6. Do you have any other comments about setting an expiry date for all passes? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
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Expiry dates become complicated in a multi-function card – how have these been taken into account? Ultimately card readers are the only way of checking and updating service/product level expiry dates.

A staggered rollout or just staggered expiry dates would have the benefit of staggering the renewal phase.

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| 7. Do you agree that passes should be smartcards? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
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Yes. The cost of making the cards smart has fallen substantially in recent years and this provides an excellent opportunity to introduce smart cards with all the additional security and management information benefits that this brings.

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| 8. Do you have any further comments about the plans to require all passes to be smartcards? | YES x <input type="checkbox"/> | NO <input type="checkbox"/> |
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This sounds quite clear cut but hot listing arrangements will require careful attention.

The proposals to fund in the region of £2.90 per pass sound superficially generous. However, it is essential that the cost implications of using ITSO are thoroughly understood by TCAs. What level of additional ongoing costs should a TCA expect to incur under the new scheme? i.e. capital and revenue implications need to be considered and spelled out.

What does "ITSO compliant" mean in this context and what are the implications? Accepting the description of the ITSO facility, it is worthy of note that there are Citizen card specifications for both Mifare ® 4k and Java cards that are presently in use in local authorities. These allow co-residence with ITSO facilities if appropriate card mapping is used.

9. Do you agree that London Freedom Passes should comply with the national design and specifications for 2010?

YES x

NO

Yes, this should be readily achievable and should be mandated.

10. Do you agree that re-stickering London Freedom Passes with the national concessionary travel logo will enable bus drivers outside London to recognise them as valid for the national concession?

YES

NO x

There is a risk that the sticker will wear off and be used as a method to create cards for fraudulent use. Regular travellers outside London should be offered an ITSO smartcard to the English design at an earlier date. The sticker detail should be incorporated in any re-issued cards.

11. Do you think that the transitional period where existing passes are still valid for travel within a TCA should be introduced?

YES x

NO

Please explain your reasons and add any additional comments you wish to make:

It is reassuring to see that contingency plans are in place and that transitional arrangements are being considered.

Given the time constraints, and accepting that all passes issued from April 2008 should be to the new format, the initial workload can be smoothed considerably by issuing new style passes over a period of time. This relaxation would allow new cards to be introduced in a more controlled manner and would provide Local Authorities with greater flexibility as they introduce the new concession passes. Adopting this approach would allow replacement

passes to be issued on demand after April 2008 if individuals feel no urgent desire for the National product. There remains a need to define a cut-off date for the completion of this exercise.

In the interim, existing cards would only be valid in the TCA and possibly neighbouring areas by agreement. This could allow TCAs and their partners to develop a rolling social programme where a number of age/disability related services could be brought together and taken out into the community. The National entitlement would be one of the major carrots to gain community engagement.

12. If yes, should the transition period be for three months, six months or some other period (in which case, please specify)?

YES

NO

Please explain your reasons and add any additional comments you wish to make:
6 months

13. Do you think the transitional period should be specified in regulations or be a voluntary agreement between TCAs and bus operators?

YES x

NO

Please explain your reasons and add any additional comments you wish to make:
To ensure clarity and consistency it should be fixed at 6 months in regulations.

If you have any other general comment that you would like to make concerning this consultation, please give them here: