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Our Ref: PF/AJW/R/65

Your Ref:

05 February 2007

Mr M Davey
Competition Commission
Victoria House
Southampton Row
London
WC1B 4AD

Dear Mr Davey

SCOTTISH CITYLINK INQUIRY: NOTICE OF PROPOSAL TO ACCEPT UNDERTAKINGS

I refer to the current consultation on the draft undertakings that you are currently conducting.

Joint Venture operations are vitally important to residents of the Moray Council area, and to the tourism market upon which the economy of Moray is heavily dependent.

Moray is a relatively remote area, without direct rail or coach links to the central belt, so connectivity, frequency and price are important considerations for our population. Essential links south are by means of connections at Inverness, Aviemore or Aberdeen and customers within Moray already travel significant distances to reach these connection gateways. I would suggest that any future opportunities to extend the northern ends of the Saltire Cross into or through Moray will be jeopardised if the Commission progresses with the divestment.

Since the improved timetable introduced by the Joint Venture on Saltire Cross services, travel opportunities have greatly improved for Moray residents, and I have received positive feedback about the services provided from the various community forums I attend with my officers.

I have spent a lengthy career in transport, both as a bus operator and as a Local Authority Transportation Officer, and it is my considered opinion that the interests of customers will not be well served at all by a sale of any part of the Joint Venture operations on the Saltire Cross. This view is shared by the three professional transport officers within the Moray Council Public Transport Unit, all of whom have served as operators before turning to local government.



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Head of Direct Services: Alexander Ritchie
A Division of the Environmental Services Department: Robert A Stewart, Director

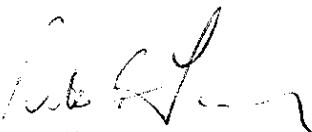
Rather, the adoption of behavioural undertakings covering aspects such as fares, service levels and vehicle quality will safeguard the travelling public, and also help to meet policies of both central and local Government in Scotland. I note in your Final Report that such undertakings were offered, but rejected solely as the Commission finds it easier to police a divestment. This seems to make the decision process-driven rather than customer-driven, which seems to contradict everything we strive for in building a public transport network for the twenty first century. I am sure you are aware that a previous case involving the rail industry in Scotland resulted in behavioural undertakings, so there seems to be a strong precedent that should be followed.

From a local perspective, we have a very positive working relationship with Stagecoach, who are receptive to ideas and suggestions. Their involvement in the Joint Venture has been a benefit to local authorities.

I am aware that the decision in your Final Report has prompted significant opposition from the north of Scotland, an area which depends on Joint Venture services for many vital lifeline links. I support the opposition to a divestment that you have already received from respondents in this area, namely Fergus Ewing MSP, the Highland and Islands Regional Transport Partnership, Highlands and Islands Enterprise and the Cairngorm National Park Authority.

I urge the Competition Commission, through this consultation on draft undertakings, to reconsider the decision and adopt behavioural undertakings and allow the Joint Venture operations on the Saltire Cross to continue intact. Please publish this letter on the Competition Commission website along with the other representations from concerned individuals and organisations.

Yours sincerely



Peter Findlay
PUBLIC TRANSPORT MANAGER



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