

**Delayed Office Opening for Employee Training**

*This Office will be closed from 8.45am – 11.00am on the 1<sup>st</sup> Thursday of each month*



**Public Space Management**  
Head of Service Jim Valentine

Pullar House 35 Kinnoull Street  
Perth PH1 5GD

Contact Andrew Warrington  
Direct Dial (01738) 476530  
E-mail: awarrington@pkc.gov.uk

Our ref AJW/Comp Com

Your ref Scottish Citylink

Date 9 February, 2007

Ms A Jolly  
The Competition Commission  
Victoria House  
Southampton Row  
LONDON  
WC1B 4AD

Dear Madam

**Re: Scottish Citylink Inquiry - Undertakings**

Thank you for your letter dated 01 February 2007 informing me that the public consultation on the draft Undertakings in the above regard had started. I have subsequently reviewed the Undertakings and trust that the following comments will be helpful to your deliberations.

Within my overall remit as Public Transport Manager for Perth & Kinross Council I have a responsibility, within the resources available, to develop the public transport network locally. Thus my principal interest is to ensure that, as far as is practicable, public transport users resident in Perth and Kinross, as well as visitors to the area, are not disadvantaged in any way by the proposed outcomes of your Inquiry.

You will be aware that I have previously expressed my concerns, both verbally and in writing, about your recommendation to divest some services to a new and independent owner. From my professional viewpoint the imposition of *Behaviour Undertakings* would address any issues the Competition Commission has with the Joint Venture operators, whilst at the same time guaranteeing the interests of current and future express coach users on the Saltire Cross Services.

Having read through your draft Undertakings document, my viewpoint has not changed. What you are effectively consulting on is a procedural arrangement. The document does not provide any reassurances for the public transport user if the divestment were to go ahead and not be effective.

From my reading of the documents, the Vendors have certain commitments for 12 months only. What happens after this - is the open free market allowed to operate again? What Undertakings are going to be placed on the new and independent operator from the outset? Will all parties collectively have to maintain all existing timetable frequencies, service levels, journey connections, fares promotions etc?

Environment Service Helpline Tel 01738 476476  
Planning Tel 01738 475300 Fax 01738 475310  
Roads & Transport Tel 01738 476500 Fax 01738 476510

Jim Irons  
Executive Director

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What I have still not seen - which for many public transport interests will be an absolute prerequisite - are details of what action the Competition Commission will take if their divestment arrangements fail to provide a similar, or better, level of express coach provision on the Saltire Cross routes to that available at present. Any guidance you can provide on this important issue would be very gratefully received.

Also can you advise me if you are to consult on the standards of service the new independent owner will need to comply with and how this will be monitored.

I can confirm that I am happy for this response to appear on the Competition Commission website with immediate effect.

If you have any queries about this response, or wish me to elaborate on any of the points made, please do not hesitate to contact me.

Yours faithfully



Public Transport Manager

cc Mr E Guthrie, TACTRAN  
Councillors E Howie/W Wilson  
Convener (E&I)  
Vice Convener (E&I)  
JV  
LJ/JFI