



## CONSULTATION RESPONSE FORM

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Email address	<a href="mailto:secretariat@rtig.org.uk">secretariat@rtig.org.uk</a>
Company name or organisation (if applicable)	RTIG
If you would like your response or personal details to be treated <b>confidentially</b> please explain why:  We do not wish for this response to be treated confidentially <b>but</b> we would like to make it clear that this response, though it has been prepared in good faith by the RTIG Secretariat as a consensus response, does not necessarily represent the views of all of our members. Members have been invited to provide their own responses to cover their individual authority/operator/supplier perspectives.	

<b>Question 1: for example - Do the guidance and directions provide sufficient clear details to inform industry and other stakeholders? If not, what changes would you make and why?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Answer 1:</b>  See Response to Question 2.		

<b>Question 2: for example - Do any parts of the guidance and/or directions require clarification? If so, please refer to the paragraph number and explain why.</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>Answer 2:</b>  (various but especially ¶76ff) Our comments on the previous draft remain valid. While operators are judged at a detailed level against a registered timetable, local authorities have only vague and general obligations. It will be difficult for them to know what, precisely, their statutory duty is, and correspondingly difficult for Traffic Commissioners to judge performance objectively.		

<b>Question 3: for example - Are there any aspects of guidance and directions which, as drafted, should not be included? If so, please explain why.</b>	Yes <input type="checkbox"/>	No <input type="checkbox"/>
<b>Answer 3:</b>  We have no comment to make on this.		

<b>Question 4: for example - Are there other provisions not included in these guidance and directions that should be? If so, please explain what they are.</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Answer 4:</b>  But see also Response to Question 2.		

<b>Question 5: for example - Are there aspects of these Guidance and Directions which seem likely to increase your financial or administrative burdens? If so please explain what they are and, if relevant, what changes would reduce the increase.</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>Answer 5:</b>  Yes. As noted in our response to the previous draft, there will be increased costs and administrative burdens to all parties in deploying, using and responding to data from monitoring processes, whether this is done technologically or otherwise; and that this will not affect all stakeholders equally.  We take it from the content of the revised document that this is understood and accepted by the Traffic Commissioner.		

Please send your completed form to: [sstcconsultations@otc.gsi.gov.uk](mailto:sstcconsultations@otc.gsi.gov.uk) or by post to:

Office of the Senior Traffic Commissioner  
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Please ensure that if you submit your response by post it is clearly marked for the attention of Sarah Davies.

**The deadline for responses is: 19 May 2014**