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Dear Peter

Direct Rail Services is pleased to respond to Network Rail's proposals in relation to the structure of charges for charter operators in CP5.
We have no objections to this response being posted on the NWR website.

Comments

At the time of this response the Office of Rail Regulation has published its draft final determination which contains comments on the Network rail proposals.
We hope that NWR and ORR through the proposed charges continue to recognise the bespoke nature of charter operations.

VUC

We believe overall the proposed variable usage charges to be fair although we can empathise with our West Coast colleagues concerns at the meeting of 24/06/13 over the apparent lack of technical evidence supporting the steam locomotive rate.

EC4T/EAUC

Whilst DRS do not currently use electric traction we note that within EC4T and EAUC sections that "Historically, it has been administratively inefficient to put in place a robust process to charge charter operators."
In this time of 'efficiencies' we would like to understand how much the administrative costs to both NWR (taxpayer) and the operators will be to recover minimalistic charges.

Slot and cancellation charges

We note that the methodology of this charge is proposed to stay the same with the rate adjusted for RPI.

Capacity Charge

As freight operators we have been involved in consultation with the capacity charge and you will already understand our thoughts on this charge and in light of the RFOA proposal being considered as an alternative we would suggest that for charter operators the charge should be deferred until CP6 to allow the work around the proposal to be completed.

Schedule 8

Given the new proposed operator schedule 8 rate of £69.31 we agree that it is appropriate to set a bench mark.

We are pleased to note that the ORR draft determination is indicating retention of the incident cap.

We would also ask for clarification on the financial cap V minutes in so far that at today's rate the cap equates to approximately 147mins and at the proposed rate with the cap staying the same equals around 79mins., as discussed at 26/4 meeting.

Schedule 4

We agree with the proposal to continue to exclude charter operators from the schedule 4 regime.

Station charges

As discussed at 24/6 meeting we believe that these charges should be regulated.

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