Going cashless on TfL bus services
Consultation report
January 2014
Section 1

Introduction

In late August to early October this year we at Transport for London (TfL) carried out a non-statutory consultation with the public, passengers and stakeholders on a proposal to remove the option to pay by cash on our bus services.

This report summarises the responses to the consultation and gives our response.

1.1 Why we consulted
The increased use of Oyster and contactless payment cards (CPC) has reduced the number of passengers paying cash fares on buses from around 20 per cent ten years ago to around one per cent today. This has led to significantly improved boarding times and speeded up bus journeys.

The current low and declining use of cash means that significant savings could be made by removing the cash facility and costs of handling it, and reinvesting the money back into the network. It is felt that very few passengers would not disbenefit from the removal of this option to pay by cash. However, the people who use cash to pay do have real concerns. The consultation was to find out what the issues are for them and how we could mitigate them.

1.2 Context
Most customers who pay by cash for bus tickets do so infrequently. The most common reasons given for this are forgetting to top up an Oyster card and forgetting or losing an Oyster card. Almost all Londoners and visitors to the Capital who have paid for tickets by cash in the past year report that they have an Oyster card (94 per cent and 86 per cent respectively).

Customers can set up an auto top-up facility on their Oyster to ensure they always have enough credit. Balances are topped up automatically when touched in on buses. Cards can also be topped up, with any amount, at around 4,000 Oyster Ticket Stops, at all Underground stations, at nearly all national rail stations in London and at some National Rail stations outside London such as Caterham, Watford Junction, Brentwood and Chafford Hundred.

Awareness and ownership of CPCs has increased since 2011. However, overseas visitors appear to be less aware and are also the group least likely to own an Oyster card.
Section 2

The consultation

2.1 What we proposed and why

We proposed to remove the option to pay by cash on our bus services in 2014.

Since the introduction of the Oyster card in 2003 and the launch of CPC on London buses last year, more and more passengers are now appreciating the convenience and value for money these options offer. This year cash fares have fallen to around one per cent of total bus journeys, down from 20 per cent 10 years ago. With such low levels of cash being used and the cost to us of providing for these cash payments, especially compared to the cheaper alternative of paying by Oyster and CPC, we decided that now is the time to ask for people’s views on going cashless.

Going cashless will remove the delays associated with cash transactions which would also benefit everyone. Cash payers would benefit from a cheaper fare, saving around £1 a trip if they switch to Oyster pay as you go or CPC.

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The cost of collecting such low levels of cash is high. It includes the additional cost in contracts with operators, on-bus kit maintenance and replacement ticket machines. We would make net savings from 2016/17, building to around £24m a year from 2019/20 onwards, which could be reinvested into the transport network for the benefit of everyone.

Paying with Oyster or CPC guarantees the cheapest fare. But to help people who don’t have enough credit on their Oyster card, we will introduce a new Oyster feature that will allow passengers to make one more bus journey. This would help them get home or get to the nearest station or Oyster Ticket Stop. The negative balance on their card would be removed on the next successful pay as you go top-up.

We have Oyster campaigns to help educate passengers about using Oyster and its benefits as not all bus users understand how daily capping works and the value for money it represents for them.

2.2 Methodology

The public consultation ran from 19 August 2013 to 11 October 2013. Before this, we consulted with key stakeholders, including local councils and passenger representatives, to inform them about the consultation and increase awareness of it. It was designed to help us understand public, passenger and stakeholder opinion about the proposal to make a better informed recommendation to the Mayor for his decision.

The potential outcomes of the consultation were that we advise the Mayor:

- That the exercise raises no issues that should prevent him from proceeding with the proposal
- Of modifications to the proposal in response to issues raised
- To abandon the proposal as a result of issues raised
The objectives of the consultation were:

- To give stakeholders and the public easily-understandable information about the proposal, and allow them to respond
- To understand the level of support or opposition towards the proposal
- To understand any issues that might affect the proposal of which we were not previously aware
- To understand concerns and objections
- To allow respondents to make suggestions

The consultation followed best practice principles:

- Consultation will take place when the proposal is still at a formative stage
- Sufficient reasons must be given for the proposal to allow for intelligent consideration and response
- Adequate time must be given for consideration and response by consultees
- The process must have an honest intention. We must be willing to listen to the views of consultees and be prepared to be influenced when making subsequent decisions
- All those who have a justifiable right to participate in a consultation should be made reasonably aware of the exercise

Consultees must be able to have reasonable access to the exercise. This means that the methods chosen must be appropriate for the intended audience, and that effective means are used to cater for the special needs of hard-to-reach groups and others with specific requirements

We must disclose information that could materially influence the nature and extent of consultees’ responses. Consultees are also under a duty to disclose certain information

Information and viewpoints gathered have to be collated and assessed, and this task must be undertaken objectively

The output and the outcome of the process will be explained to consultees

The outcome of consultation must be conscientiously taken into account

2.3 Who we consulted

We consulted with our bus contacts, statutory stakeholders such as the Greater London Authority (GLA), all London boroughs and councils bordering London, passenger representatives including London TravelWatch, Bus Users UK and Passenger Focus, plus visitor/tourist representatives such as Heathrow and London & Partners.

We also briefed and met with the GLA Transport Committee and London TravelWatch.

Around 1.5m bus users were contacted directly. The consultation was the largest carried out so far by us with more than 37,000 responses.

2.4 Consultation material, distribution and publicity

We produced an online consultation form on our website at tfl.gov.uk/cashless. We also undertook the following:

- Produced a ‘frequently asked questions’ document with the consultation form
- Made available to key stakeholders, including councils and passenger representatives, a document library with all the information we had available to make the proposal
- Held briefings with London TravelWatch, the GLA Transport Committee, the Youth Panel and councils which asked for a briefing
- We posted 3,000 posters across the bus network. Local councils also posted them at public places
- Produced a downloadable leaflet that councils made available in public places
- Placed adverts in several editions of the Metro and Evening Standard newspapers
- Placed adverts in local newspapers and their online versions
- Sent an email to 1.5 million bus users

Publicised the proposal on our homepage, Getting Around homepage, our Facebook page and Twitter feed, and Journey Planner

The consultation was also featured on BBC London and ITV news, Facebook, Twitter and online blogs.

People were invited to respond by using the website, email or by Freepost.

2.5 Key messages

To ensure people were well informed and could give informed responses, we wanted people to know that:

- There is a very low and decreasing level of cash use; around one per cent of all bus journeys
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- Eighty-six per cent of cash users have an Oyster card

- Using Oyster or CPC is £1 cheaper than cash every trip and has a daily fare cap if using Oyster (to be introduced for CPC early in 2014)

- All passengers would benefit from faster boarding times, reduced delays and from the savings being reinvested in the network

- Staff would benefit from improved security and safety

- This proposal does not change our policy on vulnerable people not being left stranded. We continue to engage with organisations representing these people and individuals to ensure our policy is up-to-date and meets their needs. This includes regular driver training to ensure drivers can recognise a vulnerable person, that they don’t have stereotypes, and they avoid conflict to keep them safe

- This proposal does not affect the bus users (more than a third) with concessionary passes

- We are planning to introduce a new Oyster feature that will allow passengers to make one more bus journey, helping them get home or get to the nearest station or Oyster Ticket Stop. The negative balance on their card would be removed on the next successful pay as you go top-up

- Customers will be able to use CPC across the our network with daily and weekly capping early in 2014

- There are regular public information campaigns to raise awareness of getting the most out of Oyster and CPC

- We would mount a marketing and information campaign before the proposal was implemented, targeting current cash users including visitors and tourists

2.6 The questions
The consultation questions were:

1. Do you agree with the proposal – yes/no?

2. If no, please tell us why and what we can do to make the proposal acceptable

3. Do you currently use - cash yes/no? Please tell us why

4. The name of your organisation, if you are responding on behalf of one

5. Your postcode, if responding as a passenger

We ask for an organisation name so we know if the response is from an individual or on behalf of a group. A postcode is asked for so we know that people from all areas affected by the proposal are responding. No information is used for any purpose other than to analyse the response to consultation and it is archived after the consultation closes.
There were 37,573 responses received by the end of Friday 11 October. Around 40 per cent had comments:

- Yes, agree: 11,953 (32 per cent)
- No, don’t agree: 25,330 (67 per cent)
- Undecided: 290

- Total cash users, including undecided: 10,900 (29 per cent)
- No, don’t agree and use cash: 7,375 (20 per cent of total and 29 per cent of those who don’t agree)
- No, don’t agree and don’t use cash: 17,955 (47 per cent of total and 71 per cent of those who don’t agree)
- Yes, do agree and do use cash: 3,474 (nine per cent of total and 29 per cent of those who do agree)

This section groups the public and passenger responses into themes and summarises the key stakeholder responses. All the responses are public and available on request.

### 3.1 What the public and bus users said

(Continued from the previous page)

- Lost, stolen, expired or broken cards (including concessionary passes)
- Not being able to top-up or buy an Oyster card, especially at night
- The cost of the Oyster card deposit (£5 refundable) and needing to keep credit on the card
- Awareness of Oyster
- Awareness and take-up of CPC
- Reliability of CPC
- The privacy, security and traceability of using cards
- Increasing fare evasion as more people say they have forgotten or lost their card etc
- Cash is just too important to get rid of

A quarter of the people who disagreed with the proposal raised concerns about the impact on people. These were, in order of importance to them:

- Visitors and tourists who aren’t familiar with Oyster and don’t have a CPC
- Older people who may have lost or forgotten their pass, and those travelling with them
- Disabled people who may have lost or forgotten their pass, and those travelling with them
- Young people, especially at night, who only have cash on them
- Drivers having to deal with more conflicts because people don’t have their cards on them or enough credit
- Other passengers not being able to offer the cash fare for someone
- Buses also have a social purpose
A third of the people who disagreed with the proposal raised concerns with places or situations. These were, in order of importance to them:

- Vulnerable people who only have cash on them, especially at night or in unfamiliar places

The following was suggested:

- More places to top up (including bus stops, but not including on the bus)
- Ticket machines at bus stops
- Extending the proposed Oyster overdraw facility
- More places to buy Oyster (including vending machines)
- Better out-of-hours support for top-up
- Remove/reduce the deposit for Oyster cards
- Make it easier to check balances/find out when you are about to run out of credit, and alternative ways to top-up Oyster
- Have a different audible warning for low credit when touching-in with Oyster
- Advertising campaigns/communication if implemented
- Delay proposal until CPC is more widely used
- Free travel at driver’s discretion
- Tickets on mobile phones

The views of statutory bodies and key stakeholders

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<tr>
<th>Stakeholder</th>
<th>Summary of comments</th>
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<tr>
<td>GLA Transport Committee</td>
<td>Had concerns with:</td>
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<td></td>
<td>- Losing the payment method of ‘last resort’ if there is a problem with a card</td>
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<td>- Many bus passengers may be concerned that removing the straightforward cash payment option will result in them being unable to travel even though they can afford to</td>
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<td>- Leaving vulnerable people stranded</td>
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<td>- Those without bank accounts not being able to automatically top up</td>
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<td>- Lower income households maintaining high balances on Oyster cards and the initial cost of the deposit</td>
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<td>Would like to see:</td>
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<td>- The option for Oyster cards to go into negative balance in place for bus passengers before any removal of the cash payment option</td>
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<td>- Us issue updated guidance to all bus operators and drivers about the rules and procedures for vulnerable bus passengers</td>
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<td>- The fares offered on Oyster remain the cheapest and look again at the provision of Oyster purchase and top-up overnight</td>
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<td>- Us working with London boroughs and other bodies on marketing and communications on the removal of cash, and the alternatives targeted at passengers most likely to use cash and on routes where cash use is highest</td>
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<td>- Us considering whether introducing a short-term incentive for bus passengers who regularly use cash could encourage them to switch to Oyster or CPC</td>
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<td>Stakeholder</td>
<td>Summary of comments</td>
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<tr>
<td><strong>London boroughs</strong></td>
<td>- Losing the payment method of 'last resort'. This may be particularly relevant to school children who as a result may not be able to access education services. It may also affect younger adults, older people and vulnerable people who are more likely to come from a non-cashless household and be on low incomes</td>
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<td>- Leaving vulnerable people stranded, particularly at night, and drivers having to use their discretion to decide</td>
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<td>- Lower income households maintaining high balances on Oyster cards and the initial cost of the deposit</td>
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<td>- Automatic top-ups for those trying to manage tight budgets and with no bank account</td>
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<td>- Confidence in whether or not the projected savings will actually be made</td>
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<td>- Delays with drivers issuing unpaid fare reports</td>
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<td>- Risk of increased conflict between passengers and drivers</td>
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<td>- Making access to public transport harder for new and returning users, and those making trips to London</td>
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<td>- May reduce flexibility and therefore the accessibility of buses for some users who may then be excluded</td>
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<td>- People who ought to use public transport may not see it as an option, such as a driver who has drunk too much to drive</td>
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<td>- Those who only want to pay cash would be transferred to other modes, such as a taxi, adding to London’s congestion and pollution</td>
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<td>- Drivers may be at more risk of aggression from passengers who try to pay cash</td>
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<td>- The Oyster refund system is inaccessible to many people without support</td>
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<td>- Not all disabled people have a Freedom Pass</td>
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<tr>
<td><strong>London TravelWatch</strong></td>
<td>- Oyster availability in some areas and at night</td>
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<td>- Vulnerable people being left stranded</td>
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<td>- Increased disputes between customers and drivers</td>
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<td>- Visitors or occasional users not knowing about Oyster, not being able to get a card, or wanting to pay the £5 deposit</td>
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<td>- Being able to use the proposed negative balance facility on multi-stage journeys</td>
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<td>- Availability of CPC and confidence in it</td>
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<td>Would like to see:</td>
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<td>- More Oyster availability in Dorking, Fetcham and Merstham, and the replacement of ticket machines on London Tramlink so that Oyster products can be added</td>
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<td>- Keeping cash-acceptance on routes where our operators will continue to accept cash on the non-TfL services outside London, especially those routes that have the highest number of cash transactions and the smallest number of Oyster agencies</td>
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<td>- The balance on unregistered Oyster cards that have been handed back to us is used to give credit to passengers in greatest need</td>
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### Overview of consultation responses

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<td><strong>London boroughs</strong> (continued)</td>
<td>Would like to see:</td>
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<tr>
<td></td>
<td>• The deposit for Oyster removed for lower income households to encourage them to switch to Oyster in a transitional period</td>
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<td>• Being able to use the proposed negative balance facility on multi-stage journeys and introduce it before cash payment is removed</td>
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<td>• Increasing the provision of Oyster purchase and top-up overnight</td>
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<td>• Targeted local advertising on the removal of cash and the alternatives for passengers most likely to use cash, on the most cash used routes, so that they have enough time to adjust their payment methods</td>
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<td>• Being clear what vulnerable passengers can expect from drivers and to closely monitor it to ensure it is fair and consistent</td>
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<td>• Changing the audible warning on card readers on buses to warn Oyster card holders when their credit is running out</td>
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<td>• Allowing people with lost or not working Freedom Passes to travel</td>
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<td>• Allow multiple trips in negative balance as some journeys need more than one bus</td>
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<td></td>
<td>• Raise awareness and take-up of CPC</td>
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<td>• Reintroduce one-day bus passes</td>
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<td>• Provide more reassurance over the mitigation measures such as telling people about the negative balance facility</td>
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<td>• Make Oyster cards available from more places, such as libraries</td>
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<td>• More take-up of CPC</td>
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<td>• Reintroduce the ability to buy a single bus ticket and a One Day Bus Pass</td>
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<td><strong>Local councils bordering London</strong></td>
<td>Had concerns with:</td>
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<td>• The occasional user/visitor who doesn’t need an Oyster card</td>
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<td>• The availability of Oyster purchase and top-up outside London and at night</td>
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<td>• Leaving vulnerable people stranded, particularly at night</td>
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<td>• When train services can’t be used, commuters are required to use some other form of transport</td>
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<td>• Confusion where services overlap and cash is accepted on some buses but not others</td>
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<td>Would like to see:</td>
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<td>• An information campaign not just in London but throughout the area served by our bus services</td>
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<td>• Oyster facilities in National Rail stations</td>
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<td>• The allowing of Oyster cards to be debited twice to assist casual visitors</td>
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<td>• A period for users to adjust to any new arrangements including a transition period</td>
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<tr>
<td><strong>Heathrow Airport Operators Committee</strong></td>
<td>Would like to see:</td>
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<td>• Limited value Oyster cards available for sale at entry ports</td>
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<td><strong>Unite the union</strong></td>
<td>Had concerns with:</td>
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<td>• Drivers would be challenging more people if they are not able to pay cash. Does not expect the driver to become a policeman</td>
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<td>Would like to see:</td>
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<td>• Consultation with the trade union at an early stage prior to any implementation</td>
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Overview of consultation responses

Health organisations

Had concerns with:

- Ensuring the impact on the health and well-being of individuals and communities, both directly and indirectly, is minimised
- Potential increase in assaults and the fear of assault among drivers who refuse to let someone travel

Would like to see:

- Pre-implementation discussions with drivers about concerns and potential preventative measures, and the monitoring of assaults, the fear of assault and stress among drivers
- Increasing awareness of the ‘permit to travel’ provisions for emergency situations
- Maximising access to payment opportunities at night
- Targeted activity to encourage cash users to adopt Oyster
- More shops selling and topping up Oyster at hospitals for patients needing to get home and visitors

Other organisations responded and their concerns and suggestions are included in above.
Our response below collates the concerns and suggestions into four areas.

4.1 Not leaving vulnerable people stranded
This was the most important issue to people. Anyone can be a vulnerable person and anyone can get stranded. It could apply to people who have lost or forgotten their pass, when the pass is not working, or if they are waiting for a replacement.

Drivers already have clear rules and procedures for permitting passengers to travel without a valid card or ticket, and these will be reinforced with the operators and their staff before cashless operation is implemented. We will work with other organisations representing potentially vulnerable users in refining and developing the rules and procedures regarding vulnerable passengers still further. We will run a series of multi-disciplined workshops to ensure staff and user issues are fully considered and worked through, with an integrated communications plan developed to ensure staff at every level are aware of, and understand, the procedures so that they are applied in a consistent way. The overall aim will be to keep it as simple and as practical as possible.

In particular, we have been in discussion with The Suzy Lamplugh Trust about the personal safety risks to both passengers and bus drivers if a cashless system was to be implemented on buses in London. The Trust is committed to continuing to work with us to address these concerns. This includes providing guidance and input to policies designed to protect staff and passengers.

We will also continue monitoring the issue, and revenue protection inspectors will be ensuring that this facility to help vulnerable people is not abused.

4.2 The provision being made for visitors, tourists and occasional users
People were concerned about the availability of Oyster at night and outside London, and the cost of the £5 deposit for emergency and occasional users. The £5 deposit and any remaining credit are returned when the card is handed back. If the card is registered to the user then their balance is secure. We will continue to raise awareness of Oyster, including the benefits of being able to get a card online before travelling, the auto top-up facility so there is always enough credit, and the fact that card holders will always get the cheapest fare, including the daily cap.

Vending machines near bus stops and outside rail stations were suggested. However, suitable machines do not exist and would be very costly to maintain, bearing in mind the amount of use they would get. We are also currently removing our Roadside Ticket Machines from the central London Pay Before You Board area because they are little used and costly to maintain. There are, however, Oyster vending machines now at all Underground stations and their number will be increased during the first half of 2014. We will ensure that marketing campaigns make bus passengers aware of this option.

It was suggested that Oyster cards could be issued with no deposit. This would not enable us to consider allowing customers to use that deposit to go into negative balance for emergency trips. It was also suggested that Oyster cards could be shared between two or more people making the same trip. This is not technically feasible.

We are working closely with the UK Card Association to raise awareness and availability of CPC as an alternative to Oyster. Daily fare capping with CPC will be available early in 2014 and, like Oyster customers, CPC will then be able to be used across the our transport network.

London & Partners (Visit London) stated that it will continue to work with us to promote Oyster and raise awareness of the payment options for visitors and tourists from the UK and beyond before they arrive in London.

4.3 Availability of Oyster purchase and top-up facilities and emergency users
Suggestions included Oyster vending machines at rail stations and bus stops. However, awareness of how to use an Oyster card was low. If an Oyster card has the auto top-up facility enabled, it will top up automatically when touched in on the bus if the credit falls below £10. Customers can also check their balance on touching in. CPC is an alternative to Oyster and does not depend on being able to top up.

The location of Oyster Tickets Stops is under constant review. Currently, there are around 4,000. There might be the opportunity for a limited number of additional Oyster Ticket Stops to be added to the network. We will look particularly at the distribution of Oyster Ticket Stops in areas in outer London/outside the London boundary, since cash use on routes that cross the GLA boundary is 2.4 per cent compared to the network average of one per cent.

4.4 Give people time to adapt to the change
One of the strongest themes emerging from the consultation is that customers need time to adapt to change. We are not proposing to recommend to the Mayor removing cash from buses until at least the middle of 2014. This will follow the roll-out of CPC use across all of our transport modes early in 2014 and will include the same daily capping as available with Oyster cards, together with the roll-out of the new Oyster feature of allowing passengers with an insufficient but positive balance to go into negative balance to make one bus journey. Before then, there will be further marketing and information campaigns run to raise awareness of the proposed change and give people time to switch from cash to a card. It will also give more time for CPC to be in wider circulation and for people to become used to them.
Appendices

Each quarter we monitor the trend in customer awareness and usage of CPC. The trend for CPC usage continues to grow. Three quarters of customers are now aware of CPC (and this is not significantly different for any sex, age or socio-economic group), and about half of customers are expected to have a CPC by the end of 2013. Card issuers are prioritising CPC roll-out in London and the South East region. A leading card scheme provider estimates that CPC take-up in this area would typically be twice the national average and that soon the vast majority of our customers will be carrying at least one CPC-enabled card. We are also aware of a number of major card issuers which will be reissuing cards to all London and South East regional customers over the next six months and these new cards will be CPC-enabled.

The marketing and communication campaigns would particularly focus on the known categories of remaining cash payers and cover a range of different media. In particular, marketing this autumn is already encouraging passengers to switch from cash to Oyster and CPC, pointing out the £1 saving they will make for each journey. The marketing will also be integrated with the campaign surrounding the launch of CPC use across all public transport modes early in 2014.

Conclusion
We believe we have a robust plan in place to respond to the concerns people have raised in the consultation and are proposing the following mitigations are in place before removing the option to pay by cash on our bus services:

- The roll-out of a new Oyster feature allowing passengers with insufficient but positive balance to go into negative balance and make one bus journey
- The roll-out of contactless payment across all of our public transport services including daily capping
- A review of the Oyster Ticket Stop network and if appropriate the installation of a limited number of additional Oyster Ticket Stops
- Work with London and Partners to market the proposed move to cashless to visitors and tourists from outside London
- Target marketing and communication to focus on the known categories of remaining cash users
- Review and reinforce the rules and procedures currently in place for vulnerable passengers without valid cards or tickets

Appendix A – Copy of the consultation poster and leaflet

Appendix A – Copy of the consultation poster and leaflet

Appendix B – Frequently asked questions
Available on request

Appendix C – List of stakeholders consulted
Available on request