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By email to: Meera.Nayyar@dft.gov.uk

Our ref: RTIG-c0116-tr
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Dear Meera,

Re: BUS OPEN DATA: Implementation Guidance V2 FOR REVIEW

Thank you for the opportunity to respond to the draft Implementation Guidance document.

The attachment to this letter provides the corporate view of RTIG as a group; individual members may have different perspectives and may, of course, make their own submissions.

We also provide a commented copy of implementation guidance providing more detailed comments and questions on the document which we hope will assist with drafting further versions.

We trust this is helpful and are happy to clarify or explain our views in more detail.

We believe RTIG has a valuable (and proven) part to play in the future development of the Bus Open Data programme. We look forward to continuing to work with the Department, and others, to assist where we can.

Yours sincerely

Tim Rivett
General Manager

RTIG's general response

Introduction

RTIG is a community group whose members include UK local authorities, public transport operators and system suppliers, with representatives from Government and other key industry groups. Our aim is to further the effective use of information technology in the public transport sector, through sharing experience and through developing common approaches and specifications.

RTIG was established with the express purpose of bringing together a range of stakeholders within public transport, to promote knowledge sharing and consensus. This has given RTIG access to a wide range of perspectives, expandable where appropriate, and an objective credibility across the sector.

Below are our comments on the specific questions asked about the Implementation Guidance v2 document.

General Comments

The document generally appears confused between two purposes; the first trying to set out the background and justification for the changes and the second is to explain what will be required in detail. These two purposes are not clearly separated and the first currently has a much stronger presence than the second. The document includes some detail about process and IT systems but not enough to act as a manual or user guide but currently includes enough to result in the reader being unsure about what they need to be doing and how.

The options for very small operators are not clearly laid out and described. These will be the hardest to reach group and those with the greatest need of clarity of advice.

Data Quality

There is increasing concern from Authorities in particular that BoDDS will result in at least a short-term drop in data quality from medium and small operators because many are unaware where their data goes or how it gets to Traveline and other data consumers, and how or why intermediate stop times appear.

It has to be remembered that currently a lot of detail is added by authorities and or Traveline to enhance a registration to a presentable file that can be used for Journey Planning and then further work is required to add sufficient detail to enable the RTI system to work.

The ability for an operator to have a basic comparison with the current TIL / TNDS data would assist in enabling an improved understanding of the level of quality and completeness that is going to be required.

It would be helpful to have some reference to the forthcoming accessibility led changes to on-bus requirements as this will help explain the need for all Stops to be included.

If BoDDS is going to be the source data for 3rd parties and apps etc then it will require data that is at least up to RTI standard and perhaps beyond that for accessibility information. The detailed requirements for this will need explicitly listing. It may be that this is planned for the TransXChange profile guidance, if this is to be the case this guidance needs to make clear the status of that document and the obligations within it.

There is a real risk that if the data does not contain sufficient detail or is not of sufficient quality that information to the public through real time systems in particular will reduce in quality and accuracy.

TransXChange Version

The guidance has a sort of implication that Operators need to move to TransXChange 2.4 but no clear guidance as to what it really involves.

A significant number of operators it would appear from feedback already have access to v2.4 through their ETM system suppliers but are unaware of this. To utilise this would require a significant change of thinking and process by operators but has the potential to overcome the current perceived barrier to producing TransXChange.

With the introduction of the new BoDDS TransXChange profile there is a real risk of confusion about version requirements. A current suppliers v2.4 export is unlikely to match the profile requirements exactly without some changes even if minor. It may overcome some uncertainty if the profile is given a version reference, for example TxC 2.4.1. We realise that this is not strictly within the normative approach to version control of the schema and therefore may result in some adverse comment but overall, we feel it may be helpful in overcoming some communication issues.

The guidance suggests that for the initial introductory period data from BoDDS will be in multiple versions of TransXChange. This will result in the data being challenging for many, particularly smaller, 3rd parties who are not transport data specialists. A single common version is one reason why the current TNDS data set has been well received and widely used. Up to January 2021 it is therefore generally considered that most current TNDS users will remain using this source and only consider BoDDS once a common version for all data is available.

There is widespread concern from Authorities about the cost of updating their systems to support the import of TxC 2.4 data as many currently still rely on TxC 2.1. The budget planning timescales for Authorities means that bids for investment in the 2020/21 financial year need to be written in the next month. Currently there is a lack of confidence in the final requirements by Authorities for them to be able to obtain sufficient cost information from suppliers for them to be able to make successful funding bids. This has the potential to result in the inability for Authorities to make sure of BoDDS data until at least mid-2021 as well as challenges with becoming agents for data supply.

In answer to the specific points

a.   The Bus Open Data Digital Service

The information provided in the guidance is different to some of the information previously in circulation and has raised a few questions particularly from those less used to Government working in an agile way.

This section is a mix of detailed how to advice and background and is the section that creates the confusion of purpose. It would be better served with the background information being separated out from process.

b.   Preparing to use the digital service

There are a wide range of different audiences that will be using this guidance, those who know little or nothing about IT and technology and those who are domain experts.

At the moment this section within paragraphs mixes generalised and specific information and would benefit from greater clarity and separation of general process and details.

It introduces concepts including NeTEx and AVL without providing sufficient context and background.

c.   Publishing route and timetable data

The general process and differences between very small and larger operators are not as clear as it could be.

The summary of information that is required is helpful, but insufficient for technical staff who will need to know exact data fields and types. If this is being provided elsewhere then where the definitive source of this information can be found needs to be referenced.

The requirement to make data available at particular times needs to be more clearly identified. Particularly that the detailed data will need to be ready before they even talk to their Authority(ies), so it is available at 72 days.

There is significant concern from Authorities about now more direct link to registration processes and the timescales involved. This is particularly given the current processes and work undertake to prepare data for submission from operators to journey planners and real time systems which now may be expected to be undertaken before the 72-day period. The ability, or otherwise, to re-submit data is unclear along with the process of approving data for release with the steps that need taking to alter any submitted data and who enlivens it on what basis of approval and how this is cross-checked.

d.   The role for local transport authorities

This section appears vague and provides information that may be better placed elsewhere (for example paragraph 3.7).

The role of Authorities in the current data processes is not recognised in this section, not how they may useful assist operators in future, only the agent role.

e. Publishing data about bus stops

We consider that the refences to Stop data in the section 'Publishing route and timetable data' is a little confusing in language as the definitions are in NaPTAN so should not involve the Operators they will be publishing Route and timetable data referencing NaPTAN not publishing it.

With the current debates around the quality of NaPTAN data is would be useful to highlight an expectation that Authorities work with operators to ensure agreement over naming in particular. A reference to the forthcoming accessibility led changes to on-bus requirements would help strengthen this requirement and prepare Authorities for the work involved in supporting this initiative.

f. The role for Department for Transport

There are initiatives referenced in this section that will be helpful for the implementation of the Acts requirements but that will have been completed by the time many people will be reading this guidance. This could lead to the view that the work has not been completed when in fact it has been.

g. Quality assuring data

This section is a mix of detail and high-level descriptive content and would benefit from these two purposes being separated out.

Where quality checks are being undertaken these will need to be detailed in nature and complete to enable operators and suppliers to understand the expectations. It may be that this level of detail is best provided in a separate document, this should be referenced here along with the regulatory status of these checks.

h. Using the data to develop products

The clarity that they will be open, and anyone will be able to access it and use it for whatever purpose they see fit, is welcomed.

There is an opportunity here to encourage operators to ensure that their data is of suitable quality and fit for purpose otherwise the data consumers are likely to interpret the data.

i. Compliance and enforcement

We have no comment.