

3rd February 2020

**Automated Vehicles Team,
Law Commission
1st Floor, Tower,
52 Queen Anne's Gate
London SW1H 9AG**



Dear Sirs,

Re: LAW COMMISSION: AUTOMATED VEHICLES: RESPONSES TO CONSULTATION PAPER 2 ON PASSENGER SERVICES AND PUBLIC TRANSPORT

We refer to the Law Commission's Consultation Paper 2 on Passenger Services and Public Transport which was issued on 16th October 2019 and attach our response to the consultation questions.

The British Insurance Brokers' Association (BIBA) is the UK's leading general insurance intermediary organisation representing the interests of some 1,850 insurance brokers and their customers. Our members contribute 1% of GDP to the UK economy through arranging almost 70% of all general insurance with a premium totalling £66.5 billion.

We and our members are keen to collaborate with the Law Commission and the Department of Transport as we seek to prepare the ground for adoption of more autonomous vehicles on UK roads and, specifically to address the safety and insurance implications that this rapidly evolving trend in mobility will bring.

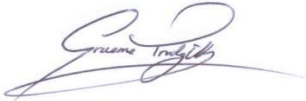
While we have endeavoured to answer those questions that are relevant to us in some depth in the attachment, we thought it would be useful to summarise our three key points:

- We strongly agree that Highly Automated Road Passenger Services (HARPS) **should be subject to a single national system of operator licensing**. We see this as essential to ensuring that safety is the overriding priority as these new systems of transport evolve.
- We strongly agree that the law should be amended to clarify that **HARPS operators are 'users-in-charge'** for the purposes of roadworthiness and insurance offences.
- Where HARPS are leased, our preference is to ensure that the **lessee has the responsibility** for arranging insurance cover, ensuring choice, a thriving market, competition and a natural market pressure to keep premiums down, benefiting the consumer. This is similar to the current situation that exists for many privately leasehold vehicles. Please refer to our responses to Questions 11 and 18.

Although not specifically raised by your question set, we would ask the Law Commission to **legislate for mandatory data release** by the vehicle manufacturers so that responsibility for accidents can be ascertained.

We look forward to receiving the conclusions of the consultation in due course. In the interim, should you have any questions on our responses or would like to meet to discuss, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Graeme Trudgill', with a stylized flourish extending to the right.

**Graeme Trudgill, Chartered Insurance Practitioner
Executive Director**

T: [REDACTED]

Email: [REDACTED]

Attachment: BIBA's responses to Consultation Questions 1 - 38

LAW COMMISSION: AUTOMATED VEHICLES: RESPONSES TO CONSULTATION PAPER 2 ON PASSENGER SERVICES AND PUBLIC TRANSPORT

RESPONSE BY THE BRITISH INSURANCE BROKERS' ASSOCIATION (BIBA)

CHAPTER 3: OPERATOR LICENSING – A SINGLE NATIONAL SYSTEM

A single national scheme

Consultation Question 1 (Paragraph 3.82): Do you agree that Highly Automated Road Passenger Services (HARPS) should be subject to a single national system of operator licensing?

Agree: This makes sense given the fact that this a new form of transport where safety is the paramount concern. It needs to be flexible enough to respond to new developments, especially if operators seek to exploit perceived loopholes and/or exemptions. A single national system would also ensure consistency of oversight – as understanding the full picture for such cutting edge and developing technologies is crucial to ensure safety.

It is envisaged by large corporates currently testing these technologies in the United States, that a great many of autonomous vehicles will indeed be HARPS and private ownership will become less frequent. It is therefore also important that this single body shares learning and data with respective bodies around the globe with regards to licensing. This is much easier to do with one single system.

Consultation Question 2 (Paragraph 3.86): Do you agree that there should be a national scheme of basic safety standards for operating a HARPS?

Agree: See above. We can see no reason for a different regional or metropolitan approach.

CHAPTER 4: OPERATOR LICENSING – SCOPE AND CONTENT

Scope of the new scheme

Consultation Question 3 (Paragraph 4.33):

Do you agree that a HARPS operator licence should be required by any business which:

- (1) carries passengers for hire or reward; Yes
- (2) using highly automated vehicles; Yes
- (3) on a road; Yes (DEFINITION?) versus 'other public place.' See page 61.
- (4) without a human driver or user-in-charge in the vehicle (or in line of sight of the vehicle)? Yes

The Law Commission needs to factor in the current refit of the Motor Insurance Directive which is proposing new definitions for the terms 'vehicle', 'use' and 'in traffic.' There needs to be alignment.

A judgement in the Court of Justice Court of Justice of the European Union, Damijan Vnuk v Zavarovalnica Triglav d.d. (2014)¹, ruled that motor insurance should apply to motorised vehicles whether or not they were on a public road. The definition of a motor vehicle under the Motor Insurance Directive (subsequently implemented in to domestic legislation) was inadequate and could be found to mean any motorised vehicle, including the like of child ride-on toys and robot vacuum cleaners could fall under the definition and require compulsory motor insurance. In order to avoid this

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A62013CJ0162>

unwanted situation, a refit of the Motor Insurance Directive is currently taking place to better define a vehicle. The draft definition being considered is:

- 'vehicle' means any motor vehicle with a maximum designated speed of 25km/h or higher and a motor having a minimum continuous rated power more than or equal to 250 W, intended to serve as a means of transport of persons, goods or the vehicle itself on land and propelled exclusively by mechanical power, but not running on rails, and any trailer, whether coupled or un-coupled.

One previous definition previously offered also referred to being used 'in traffic'. We highlight this refit to the Law Commission to ensure that definitions used are compatible with the work currently being undertaken in Europe and definitions such as 'road' are tight enough not to create unintended consequences with regards to compulsory insurance requirements.

Consultation Question 4 (Paragraph 4.34): Is the concept of "carrying passengers for hire or reward" sufficiently clear?

The definition of *Hire and Reward* needs to be capable of being adapted quickly to address new situations. Lesson of TFL/Uber/Taximeter debate in 2012 was that the law had not kept pace with technology². This case involved significant discussion around the regulations which referred to 'fixed meters' and whether or not the smartphone an Uber driver uses is indeed fixed. This regulation needs to be clear enough that it potentially captures new business models that may be developed which to all intents and purposes are HARPS vehicles, but perhaps fall outside a typical hire and reward definition as we currently understand it. For example, if a large internet search company asks you to agree to share data and view adverts during a journey but not actually pay for the trip, this quite plausible potential business model should be captured by the definition. One forecast puts a \$2billion revenue number on goods sold on-line in autonomous vehicles.

Exemptions

Consultation Question 5 (Paragraph 4.46): We seek views on whether there should be exemptions for community or other services which would otherwise be within the scope of HARPS operator licensing.

Given the novelty of scheme we see no reason for allowing exemptions until it has a proven track record in terms of safety. In particular, we do not think that community groups, school buses should be excluded. The common thread is the removal of the human factor.

Consultation Question 6 (Paragraph 4.54): We seek views on whether there should be statutory provisions to enable the Secretary of State to exempt specified trials from the need for a HARPS operator licence (or to modify licence provisions for such trials).

From the consultation, it is unclear what is meant by controlled and limited circumstances and if other vehicles be on the road at the same time. While trials are clearly needed, when this involves other road traffic there will need to stringent controls to ensure safety is not compromised. If not, it is difficult to see how insurers could cover such an uncertain exposure.

Operator requirements

² https://www.judiciary.uk/wp-content/uploads/2015/10/tfl_-_uber-final_approved-2.pdf.

Consultation Question 7 (Paragraph 4.72): Do you agree that applicants for a HARPS operator licence should show that they:

- (1) are of good repute;
- (2) have appropriate financial standing;
- (3) have suitable premises, including a stable establishment in Great Britain; and
- (4) have a suitable transport manager to oversee operations?

Agree. Proviso (3) might be too onerous dependent upon what we negotiate with the EU27 in terms of regulatory alignment in this area. Also, there are potential issues with the island of Ireland in a post Brexit context, as vehicles can pass over this border several times per day just going about normal daily business. Although the Law Commission's work only concerns the law in England and Wales and the question refers only to Great Britain, these are important considerations to achieve a consistent approach across the whole of the UK.

Stable establishment = depot? Could vehicles be left on street as the technology develops? P70.

We think there are other provisos that should be considered: for example, demanding a certain level of cyber-attack readiness/certification.

Consultation Question 8 (Paragraph 4.73): How should a transport manager demonstrate professional competence in running an automated service?

We note that this will not be done by examination (at least at the start.) We do, however, think that there should be some form of certification process to evidence that the transport manager is competent and that this is regularly reviewed/updated. For example, could certification be withdrawn in the event of an untoward number of accidents or near misses? Is there a role to be played by the manufacturer of the automated vehicle? The skill set required needs to be carefully established and could involve software engineering and data scientist type skills as well as cyber security. For example, a good transport manager should be regularly looking at data from each vehicle under his/her control to detect trends that might indicate possible safety issues – for example, near misses. If the Transport manager is to be accountable for the cyber resilience of the establishment, this brings a different set of skills into play. This is a complex area: for example, would interference with software transfer blame in a situation where the vehicle fails?

Adequate arrangements for maintenance

Consultation Question 9 (Paragraph 4.89): Do you agree that HARPS operators should:

- (1) be under a legal obligation to ensure roadworthiness; and
- (2) demonstrate “adequate facilities or arrangements” for maintaining vehicles and operating systems “in a fit and serviceable condition”?

We agree with this question. What is meant by ‘roadworthiness’ may need new consideration. Vehicles need not just to be mechanically sound, but their software needs to be current. A future MOT could look quite different. Who is responsible for software updates? And where does the line fall between the operator and the manufacturer? The cyber resilience of the operator's establishment is also a consideration. Has the Commission considered mandatory data release by the vehicle manufacturers so that responsibility for accidents can be ascertained?

Consideration also needs to be given to who is authorised to service/repair the vehicle given their complexity.

Consultation Question 10 (Paragraph 4.90): Do you agree that legislation should be amended to clarify that HARPS operators are “users” for the purposes of insurance and roadworthiness offences?

We agree that HARPs operators should be classified as users for the purposes of roadworthiness offences. The HARPs operator is effectively the owner of the vehicle while the person in the vehicle is effectively the customer. It would be unfair and place an undue responsibility on the passenger to ensure that, for example, software or firmware is up-to-date, especially as some passengers may not even have a driving licence or may be underage.

As to the question of who has legal responsibility with regards to the arrangement of insurance, this is a relevant issue for Q.11 and we will tackle this in our response to that question.

Consultation Question 11 (Paragraph 4.124): Do you agree that HARPS operators should have a legal duty to:

(1) insure vehicles.

We believe that for HARPs vehicles which are effectively autonomous taxis or bus services, the operator should be responsible for the insurance provision. The scope of cover should also be expanded to ensure that cover for cyber-attack is a compulsory part of cover to provide protection for users and third parties.

In the case of leased vehicles which may fall under the scope of HARPs, it would be our strong recommendation to ensure that the user, or lessee, is responsible under law or regulation for the arrangement of cover. The reason for this is due to a likely shift in consumer behaviour, already observed in other areas of the economy, from an ownership basis to a use basis. If this is realised in the motor market, this could result in a huge upsurge in the numbers of vehicles leased compared to those owned, not least because of the likely high cost of level 4 and 5 vehicles compared to those at levels 0, 1 and 2. If responsibility for the arrangement of insurance is on lessors, there is a risk that just a few large leasing companies own the market not only for vehicles, but also in the arrangement of insurance. Such a restriction in competition would be detrimental to the end-users who would have little control over the cost.

Our preference is to ensure that the lessee has the responsibility for arranging cover, ensuring choice, a thriving market, competition and a natural market pressure to keep premiums down, benefiting the consumer. This is similar to the situation that exists today for many leasehold vehicles.

(2) supervise vehicles.

We agree that HARPS operators should be responsible for the supervision of the vehicles they operate.

(3) report accidents.

There needs to be a ‘responsible’ person in a legal sense for ensuring that these duties are carried out. We agree that HARPS operators should hold the responsibility to report accidents given the technology on-board and encourage the Law Commission to reflect on the questions posed in the Department for Transport consultation on reporting accidents to police and ensure that both

pieces of work match up and do not conflict with one another. The consultation revived calls for input in 2018 but Government have not yet responded to those inputs.

We also believe there should be a responsibility to report so-called 'near misses' - especially during the early phases of this roll out of HARPS, that information is likely to be very relevant in terms of determining where collisions or incidents are likely to occur. This information should also be publicly available and would certainly be of interest to the insurance industry to ensure risk-reflective pricing.

Near misses would need to be defined and this should form part of further consultation as the regulations are drawn up.

(4) take reasonable steps to safeguard passengers from assault, abuse or harassment.

We agree that it is common sense to take reasonable steps to protect users from assault or abuse, but this is not an area which is relevant to our work.

Consultation Question 12 (Paragraph 4.125): Do you agree that HARPS operators should be subject to additional duties to report untoward events, together with background information about miles travelled (to put these events in context)?

We agree that HARPS operators should be required to report untoward events, as per our response to Q11 (3), and the context of how and when to report be defined and understood by operators. The context of incidents per mile travelled would also add useful context. Also, to build public confidence, it makes sense to make this data available to consumers.

Consultation Question 13 (Paragraph 4.128) Do you agree that the legislation should set out broad duties, with a power to issue statutory guidance to supplement these obligations?

We agree that any primary legislation should be high level with specific requirements defined and set out in secondary legislation, regulation or statutory guidance to ensure it is flexible to respond quickly to a change in how these services operate or other events or accidents that require remedy. This is certainly important with developing new business models, consumer shift and behavioural traits to ensure that this work can keep pace with these developments.

Price information

Consultation Question 14 (Paragraph 4.133) We invite views on whether the HARPS operator licensing agency should have powers to ensure that operators provide price information about their services. In particular, should the agency have powers to:

- (1) issue guidance about how to provide clear and comparable price information, and/or
- (2) withdraw the licence of an operator who failed to give price information?

We do not have any comment on the pricing of services, other than our response to Q11 on ensuring choice with insurance provision for leased vehicles.

Who should administer the system?

Consultation Question 15 (Paragraph 4.138) Who should administer the system of HARPS operator licensing?

We see merit in both options outlined. What we do think is important is that there should only one body vested with is responsibility. Traffic Commissioners may make most sense and this would help in the context of integrating HARPS with Public Transport as outlined in Chapter 8.

Freight transport Consultation

Question 16 (Paragraph 4.140) We welcome observations on how far our provisional proposals may be relevant to transport of freight.

We think that they are highly relevant. Freight will provide a new set of challenges: for example, the severity of an accident could be greatly increased if we contemplate a scenario where a ‘platoon’ of autonomous lorries goes out of control on a motorway. The risk of catastrophic third-party bodily injury and property damage could be huge. Balanced against this, the environment in which such vehicles operate (major roads and motorways) is more conducive to automated vehicles than congested urban areas where HARPS operators may be focussed.

CHAPTER 5: PRIVATELY-OWNED PASSENGER-ONLY VEHICLES

Setting a boundary between HARPS and private leasing

Consultation Question 17 (Paragraph 5.12) Do you agree that those making “passenger-only” vehicles available to the public should be licensed as HARPS operators unless the arrangement provides a vehicle for exclusive use for an initial period of at least six months?

We agree with the sentiment of the proposal to ensure that vehicles are appropriately categorised as HARPS, but question the definitions used. Firstly, the term ‘exclusive’ may limit usage from family members who typically share a car, especially as one of the aims of the Government’s vision on the future of mobility is to remove as many vehicles from the road as is feasible to do so. We do not believe this is the intention and so another attempt at this definition may be required to ensure it does not create unintended consequences such as restricting the use of these vehicles, or worse – potentially criminalising someone who leases one of these vehicles for them and their family unknowingly.

Secondly, there is no logic set out to why a period of six months has been chosen. That is not to say there isn’t a logical reason to use six months as the threshold, just it is not apparent to us at this moment. We would also like to ensure that this period runs in parallel with any policy wording for insurance as most insurances policies span one calendar year. If the purpose changes mid-term and the insurer is not made aware, it is likely to invalidate the policy, and so we seek to ensure that in using six months as a threshold, it does not conflict with the execution of the user’s contract of insurance.

Allocating responsibility for a privately-owned passenger-only vehicle: placing responsibilities on keepers

Consultation Question 18 (Paragraph 5.40): Do you agree that where a passenger-only vehicle is not operated as a HARPS, the person who keeps the vehicle should be responsible for:

- (1) insuring the vehicle.

With regards to our answer to Question 11, we are very strongly in favour of the keeper of a vehicle, for example in the case of leased vehicles, being responsible for the arranging of suitable insurance and believe that it is crucial in ensuring choice and a competitive market – two important factors in ensuring that cover can be as competitively priced for the keeper/user.

(2) keeping the vehicle roadworthy.

Where a vehicle is not a HARPS vehicle, we agree the keeper should be responsible for the roadworthiness of the vehicle.

(3) installing safety-critical updates.

Whilst we believe that the vehicle manufacturer should retain a high degree of responsibility for ensuring the vehicle is fit-for-purpose (including safety critical software updates), it is important to note that Part 1, 4(b) of the [Automated and Electric Vehicles Act 2018](#) which states: An insurance policy in respect of an automated vehicle may exclude or limit the insurer's liability under section 2(1) for damage suffered by an insured person arising from an accident occurring as a direct result of—a failure to install safety-critical software updates that the insured person knows, or ought reasonably to know, are safety-critical. Whilst we somewhat disagree that the end user should own this responsibility, it is important that the position the Law Commission come to does not create conflict with this piece of legislation.

(4) reporting accidents.

We believe that the User in Charge (UIC) should have the responsibility to report accidents, in line with current legislation.

(5) removing the vehicle if it causes an obstruction or is left in a prohibited place?

We believe that the UIC should have the responsibility if a vehicle causes an obstruction. The UIC can be named by the keeper in the same way as is currently the case when a vehicle is detected by a safety camera exceeding a speed limit and a penalty charge notice is sent.

Note: The responsibility for installing critical updates may need some clarification so that vehicle manufacturers are not able to abrogate their responsibilities here.

Consultation Question 19 (Paragraph 5.41): Do you agree that there should be a statutory presumption that the registered keeper is the person who keeps the vehicle?

Agree.

Consultation Question 20 (Paragraph 5.42): We seek views on whether:

(1) a lessor should be responsible for the obligations listed in Question 18 unless they inform the lessee that the duties have been transferred.

As per our answers to question 11 and question 18, we believe that the lessee should have the responsibility for arranging insurance to ensure the provision of motor cover does not become a closed market where only a handful of lessors are responsible for arranging the cover and see this as a significant revenue stream to the detriment of the user.

Flexibility around insurance purchasing is a consideration. Consumers should have the ability to understand the cost of insurance and the opportunity to seek alternatives, perhaps using the services of a professional insurance broker who specialises in autonomous vehicles.

- (2) a lessor who is registered as the keeper of a passenger-only vehicle should only be able to transfer the obligations to a lessee who is not a HARPS operator if the duties are clearly explained to the lessee and the lessee signs a statement accepting responsibility?

With regards to technical or safety functions not linked to use, there is a potential that if responsibility is transferred from a lessor to the lessee, there may be significant gaps in technical knowledge causing potential unfair liabilities on the lessee and increase the risk of safety-related issues occurring.

Consultation Question 21 (Paragraph 5.47): Do you agree that for passenger-only vehicles which are not operated as HARPS, the legislation should include a regulation-making power to require registered keepers to have in place a contract for supervision and maintenance services with a licensed provider?

Agree. Having the power to intervene quickly and regulate if required is key to ensuring safety and building public confidence. We think there should be freedom of choice when it comes to the insurance buying decision.

Peer-to-peer lending

Consultation Question 22 (Paragraph 5.53): We welcome views on whether peer-to-peer lending and group arrangements relating to passenger-only vehicles might create any loopholes in our proposed system of regulation.

The words “Mere social kindness” perhaps needs some definition if not to be exploited as a possible loophole. Making the group the registered keeper may bring the same problem flagged in 5.45 if the group is composed of ‘lay’ individuals who could find it difficult to keep abreast of the technical challenges in updating vehicles and guarding against cyber-attacks.

Protecting consumers from high ongoing costs

Consultation Question 23 (Paragraph 5.60): We seek views on whether the safety assurance agency proposed in Consultation Paper 1 should be under a duty to ensure that consumers are given the information they need to take informed decisions about the ongoing costs of owning automated vehicles.

If the cost of insurance is bundled into the lease agreement, then consumers should be able to know the price of this element and have the ability to seek alternatives in the open insurance market.

CHAPTER 6: ACCESSIBILITY

What we want to achieve

Consultation Question 24 (Paragraph 6.11): We seek views on how regulation can best promote the accessibility of Highly Automated Road Passenger Services (HARPS)? In particular, we seek views on the key benefits and concerns that regulation should address.

Core obligations under equality legislation

Consultation Question 25 (Paragraph 6.31): We provisionally propose that the protections against discrimination and duties to make reasonable adjustments that apply to land transport service

providers under section 29 of the Equality Act 2010 should be extended to operators of HARPS. Do you agree?

Agree.

Specific accessibility outcomes

Consultation Question 26 (Paragraph 6.106): We seek views on how regulation could address the challenges posed by the absence of a driver, and the crucial role drivers play in order to deliver safe and accessible journeys. For example, should provision be made for:

- (1) Ensuring passengers can board and alight vehicles?
- (2) Requiring reassurance when there is disruption and accessible information?
- (3) Expansion of support at designated points of departure and arrival?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 27 (Paragraph 6.109): We seek views on whether national minimum standards of accessibility for HARPS should be developed and what such standards should cover.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 28 (Paragraph 6.124): We seek views on whether operators of HARPS should have data reporting requirements regarding usage by older and disabled people, and what type of data may be required.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

CHAPTER 7: REGULATORY TOOLS TO CONTROL CONGESTION AND CRUISING

Traffic regulation orders

Consultation Question 29 (Paragraph 7.23): We seek views on whether the law on traffic regulation orders needs specific changes to respond to the challenges of HARPS.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 30 (Paragraph 7.59): We welcome views on possible barriers to adapting existing parking provisions and charges to deal with the introduction of HARPS. 32 In particular, should section 122 of the Road Traffic Regulation Act 1984 be amended to expressly allow traffic authorities to take account of a wider range of considerations when setting parking charges for HARPS vehicles?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Road pricing

Consultation Question 31 (Paragraph 7.86): We seek views on the appropriate balance between road pricing and parking charges to ensure the successful deployment of HARPS.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 32 (Paragraph 7.87): Should transport authorities have new statutory powers to establish road pricing schemes specifically for HARPS? If so, we welcome views on: (1) the

procedure for establishing such schemes; (2) the permitted purposes of such schemes; and (3) what limits should be placed on how the funds are used.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 33 (Paragraph 7.97): Do you agree that the agency that licenses HARPS operators should have flexible powers to limit the number of vehicles any given operator can use within a given operational design domain for an initial period? If so, how long should the period be?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 34 (Paragraph 7.120): Do you agree that there should be no powers to impose quantity restrictions on the total number of HARPS operating in a given area?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

CHAPTER 8: INTEGRATING HARPS WITH PUBLIC TRANSPORT

The current system of bus regulation: HARPS as mass transit

Consultation Question 35 (Paragraph 8.92): Do you agree that a HARPS vehicle should only be subject to bus regulation:

- (1) if it can transport more than eight passengers at a time and charges separate fares; and
- (2) does not fall within an exemption applying to group arrangements, school buses, rail replacement bus services, excursions or community groups?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 36 (Paragraph 8.94): We welcome views on whether any particular issues would arise from applying bus regulation to any HARPS which transports more than eight passengers, charges separate fares and does not fall within a specific exemption. Consultation

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Question 37 (Paragraph 8.95): We welcome views on whether a HARPS should only be treated as a local bus service if it:

- (1) runs a route with at least two fixed points; and/or
- (2) runs with some degree of regularity?

BIBA are not in a position to answer this question as it sits outside of our area of expertise.

Consultation Question 38 (Paragraph 8.109):

We seek views on a new statutory scheme by which a transport authority that provides facilities for HARPS could place requirements on operators to participate in joint marketing, ticketing and information platforms.

BIBA are not in a position to answer this question as it sits outside of our area of expertise.