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Dear Ms Browner

Brookfield Rail's proposed Train Management Guidelines and Train Path Policy

Thank you for the opportunity to submit comment on Brookfield Rail's proposed revised Train Management Guidelines (TMG) and Train Path Policy (TPP).

With respect to the draft Train Management Guidelines I note that the existing Guidelines contain provision for "stakeholders to express any concern to the ERA which may arise at any time and the ERA will investigate such claims" and this provision has been removed from the proposed TMG.

With respect to the draft Train Path Policy, the existing policy includes clauses with respect to negotiating new train paths, dealing with temporary and permanent variations of train paths, removal and cancellation of train paths. The new proposed guidelines focus instead on underutilisation of train paths and how Brookfield proposes to manage that situation. Given this alternative approach, I would like to see clarification on whether Brookfield Rail has plans to capitalise on any such underutilisation in order to maximise use of the network, as this is not stated.

If you have any queries regarding these comments, please contact Paula Sothern (paula.sothern@transport.wa.gov.au) or on 6551 6094.

Yours sincerely

Craig Wooldridge
Acting Executive Director, Integrated Transport Planning
5/6/2012

cc Paula Sothern