

## **Executive Summary**

### **Direct Investigation into Mechanism of Transport Department for Monitoring the Frequencies of Franchised Bus Services**

The Office of The Ombudsman has from time to time received complaints from members of the public against the Transport Department (“TD”) for failing to properly monitor the operations of franchised bus companies. They alleged that certain bus routes were plagued with problems of delayed or even lost trips.

2. Although TD has put in place a mechanism to monitor the operations of franchised bus companies and established procedures for handling complaints from the public, the problems of delayed or lost trips have persisted and many members of the public are still dissatisfied with the Department’s responses to their complaints. This shows that TD’s monitoring mechanism is not entirely effective. There also seems to be room for improvement in the way TD responds to public complaints on these issues.

3. In this connection, The Ombudsman declared on 18 October 2012 this direct investigation into the mechanism of TD for monitoring the frequencies of franchised bus services and its complaint handling procedures with a view to identifying possible areas for improvement.

#### **Laws and Regulations Governing Operations of Franchised Bus Companies**

4. According to the Public Bus Services Ordinance (“PBSO”, Cap 230), a franchised bus company shall, at all times during the franchise period, maintain to the satisfaction of TD a proper and efficient public bus service. It shall also keep proper records in respect of the operational data of its bus service and regularly furnish such records to TD.

5. Currently, TD has granted six franchises to the following five franchised bus companies:

- Kowloon Motor Bus Company Limited (“KMB”);
- Citybus Limited (Franchise for Hong Kong Island and Cross Harbour Routes) (“Citybus 1”);
- Citybus Limited (Franchise for Airport and North Lantau Bus Network) (“Citybus 2”);
- New World First Bus Services Limited (“NWFB”);
- Long Win Bus Company Limited (“LW”); and
- New Lantao Bus Company Limited (“NLB”).

The five franchised bus companies now operate different bus routes throughout the territory, delivering a total of around 1.4 billion passenger-trips on average annually.

### ***Statutory Penalties***

6. Under the PBSO, if a franchised bus company fails to comply with the clauses of its franchise or provisions of the PBSO without reasonable explanation and follow-up action, the Chief Executive-in-Council (“CE-in-C”) may impose on the bus company a financial penalty ranging from not exceeding \$10,000 for the first occasion to a maximum of \$50,000 subsequently. Furthermore, the PBSO stipulates that if a franchised bus company fails to maintain a proper and efficient public bus service without good cause, the CE-in-C may revoke its right to operate any specified routes or its franchise altogether.

### **Monitoring of Bus Service Frequencies**

7. At present, TD monitors the service frequencies of franchised bus companies through the following means:

- requiring the bus companies to conduct “system audits” on their own internal control systems;
- reviewing the operational records furnished by the bus companies;
- conducting various forms of surveys and site inspections;
- requiring the bus companies to set out their performance benchmarks projected for the coming year in their annual Forward Planning Programmes; and
- requiring the bus companies to conduct passenger satisfaction surveys and submit the relevant reports to TD.

8. All bus companies are required to maintain records in respect of the following matters and furnish the verified records to TD after seven days:

- the time at which each bus is dispatched from the terminus on each route;
- the number of journeys and the total kilometres travelled daily by each bus on each route;
- the number of lost trips daily in relation to each route due to various reasons; and
- the number of bus drivers on duty each day and the number of reserve drivers each month.

9. TD will refer to the above records in handling complaints against bus companies or assessing their overall operations. As part of its on-going function for monitoring the frequencies of bus services, TD will also conduct regular analysis of such records.

## ***Overall Observations on TD's Monitoring Mechanism***

10. TD has sufficient channels for gathering the operational data on bus service frequencies, and the data collected are quite substantial and comprehensive. However, TD has not fully utilised these records to make in-depth examination into issues of serious public concerns (such as delayed bus trips and the dispatch of special buses). Furthermore, its verification of the operational records submitted by the bus companies is somewhat inadequate. TD mainly carries out random checks and conducts investigation when handling complaints, as well as relies on the "system audits" done by qualified auditors or certification bodies. We consider that TD should step up its verification of the operational records submitted by the bus companies.

### **Lost and Delayed Trips**

#### ***Definition of Lost Trips***

11. A service schedule is issued for each bus route specifying the service level to be maintained by the bus company, including the service hour and frequencies in different time periods. According to the definition currently adopted by TD, lost trips occur when the number of journeys actually travelled each day is less than the number specified in the service schedule for that bus route.

12. In the event of contingency or when temporary traffic arrangements are implemented due to festivals or special occasions, bus companies will adjust the frequencies of bus services according to actual needs. Special buses may also be dispatched directly to an intermediate bus stop to clear the backlog of passengers there. These special buses are counted into the frequencies of bus services and so no lost trips will incur as a result.

#### ***Situation of Lost Trips***

13. Below were the lost trip rates of all the franchised bus companies between 2008 and 2012:

<b>Bus company</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
KMB	3.2%	3.3%	6.5%	8%	4.6%
Citybus 1	1.9%	1.5%	1.4%	1.9%	3.0%
Citybus 2	0.9%	0.5%	0.4%	0.9%	1.0%
NWFB	2.9%	2.2%	2.5%	3.1%	4.7%
LW	0.8%	0.5%	1.2%	2.6%	2.6%
NLB	0.5%	0%	0%	0.1%	0.1%

14. According to the passenger satisfaction surveys conducted by the bus companies between 2010 and 2012, there was a drop in the satisfaction level of passengers towards the stability of bus services:

<b>Level of satisfaction</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
Satisfied/Very satisfied	55%	55%	52%
Unsatisfied/Very unsatisfied	20%	26%	27%
No comments	25%	19%	21%

15. Over the past three years, there was an apparent rising trend in the number of complaints<sup>1</sup> received by TD through different channels against the franchised bus companies about irregular service frequencies, lost trips and delays:

<b>Organisation</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
Transport Complaints Unit	1,100	1,468	3,508
1823 Call Centre	875	1,612	3,485
<b>Total no. of cases</b>	<b>1,975</b>	<b>3,080</b>	<b>6,993</b>

16. TD noted that the lost trip rates had started declining since mid-2012 (see **para. 13**), but the number of passenger complaints about bus service frequencies had increased in the same year. TD believed that this could be attributable to the increasing public awareness of the responsibility of the franchised bus companies; the greater public concerns about bus services following extensive media reports on lost trips; and the popularity of personal telecommunication devices facilitating the public to lodge complaints through different channels.

#### ***Follow-up Measures Taken on the Problem of Lost Trips***

17. In 2011 and 2012, TD found 549 and 719 lost trips respectively on the routes subject to its investigation. The follow-up measures taken included:

<b>Follow-up measure</b>	<b>2011 (No.)</b>	<b>2012 (No.)</b>
Issuing a reminder letter or email to the bus company	2,701	5,733
Telephone or meeting to discuss with the bus company	200	38
Revising the service schedule of the bus route	194	287
Issuing a warning letter to the bus company	6	2

<sup>1</sup> TD has not taken out the duplication in the figures of complaints received as a result of complaints lodged by members of the public through different channels in relation to the same incident.

As seen from the figures above, the number of reminder letters issued by TD to the bus companies for lost trips had increased substantially in those two years. We believe that this was related to the substantial increase in the number of complaints (see **para. 15**).

18. In the past 20 years, the Administration has only meted out on one occasion the statutory penalty applicable to non-compliant bus companies (see **para. 6**)<sup>2</sup>. Moreover, the fines lack deterrent effect, and the revocation of individual routes or the franchise altogether would not help to improve bus services in most cases. Besides, TD needs to seek approval from the CE-in-C before imposing any statutory penalty on a bus company and the relevant procedures can take a long time. In handling the problem of lost bus trips, TD actually only relies on the issuance of reminder or warning letters but the effectiveness is doubtful. The Department, therefore, should consider reviewing whether the existing system of sanctions is adequate and the need to put in place additional measures, such as publicising details of the warning letter issued on each occasion.

### *Delayed Bus Trips*

19. TD did not conduct any statistical analysis on the problem and causes of delayed bus trips. It considered that delays in bus journeys did not necessarily result in lost trips. While delays were undesirable, it would still be acceptable if the bus companies, in cases where individual buses failed to leave on schedule, could take remedial actions and arrange for the next bus on the schedule to depart as soon as possible to avoid lost trips.

20. Since statistical data concerning delays in bus journeys were not available from TD, our investigators had conducted two site inspections to observe the actual situations. We found that there were delays in about 26% of the bus frequencies. The delays ranged from 1 to 20 minutes, and were less than 5 minutes in most cases (around 84%). Furthermore, we scrutinised the operational records of three of the bus routes that were more prone to complaints. Those records, provided by TD, covered every Monday between January and June 2013. We noticed that about 20% of the buses left the bus terminus at a time later than the scheduled departure time. Such delays ranged from 1 to 30 minutes, with 1 to 5 minutes being most common (around 81%). In view of the limited scope of our observations, TD should conduct an in-depth review and relevant data analysis of the problem of delayed bus trips. Where necessary, TD should ask the bus companies to include those relevant data in their regular submission of operational records, so that it could monitor and regulate more effectively the problems of “lost bus trips” and “delayed bus trips”.

21. We do have reservations about TD’s view on delayed bus trips. Rather, we consider that delayed bus services should include the following four situations:

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<sup>2</sup> In mid-1990s, Government invoked the PBSO to impose a fine of \$8,000 on a franchised bus company. That bus company’s franchise was not renewed subsequently because its overall performance was unsatisfactory.

- (1) There are lost trips at certain time periods, and the total number of journeys travelled on that route falls short of the required number for that day. So there are lost trips on that day as a whole;
- (2) There are lost trips at certain time periods, but the frequencies of bus services in other periods are greater than the required number. So there are no lost trips on that day as a whole;
- (3) Under special arrangements, some buses skip certain bus stops; and
- (4) A bus fails to arrive at a bus stop on time and the delay is roughly equivalent to the scheduled interval between two buses.

22. In TD's view, only the first situation is regarded as lost trips. However, from the passengers' perspective, situations (1) to (4) should all be regarded as lost trips. The lost trip rates would certainly be higher if situations (2) to (4) were included in the calculation of lost trips. In view of the above, there is a significant discrepancy between TD's definition of lost trips and its view on delayed services on the one hand, and public expectations on the other. In fact, such a discrepancy might be relevant to the reason why the number of passenger complaints in 2012 about bus service frequencies still increased despite an improvement in the lost trip rates calculated by TD (see **para.16**).

23. We consider that for the passengers, serious delays and special bus trip arrangements are no different from lost trips. Hence, TD should quickly review its definition of lost trips and consider calculating the number of lost trips by dividing a day into different time periods.

### **Causes of Lost and Delayed Trips**

24. TD has attributed lost and delayed trips to the following causes:

- shortage of bus drivers, inadequate buses/vehicle breakdowns;
- traffic congestion or road accidents; and
- "other reasons" such as bad weather, typhoons, road closure or traffic diversion due to public processions or major events, random checks on buses by law enforcement agencies or handling passenger problems during bus trips

25. Moreover, senior management and drivers of the bus companies are of the view that the excessive growth in the number of private cars and the serious problem of illegal parking have caused road obstructions, which in turn aggravate the problem of lost or delayed bus trips.

## Traffic Congestion

### *Travel Speed*

26. The travel speed of vehicles can often reflect the state of traffic congestion. According to the data on the travel speeds in respect of all vehicles on major roads between 2008 and 2012, the average speeds in different areas in 2012 were lower as compared with 2008. However, the data might not reflect the actual travel speeds of vehicles during the bus journeys. Buses must follow their scheduled routes and thus are more easily affected by congestion, while other vehicles can avoid the congested roads, but on the other hand, buses can benefit from traffic measures such as designation of bus lanes to remain unaffected by some congested roads. We noticed from newspaper reports quoting a bus company saying that the overall average travel speed of their buses decreased by 17% in 2012 as compared with 2007, showing that the travel speed of buses obviously became slower. TD should request the relevant data from the company concerned. If what the situation was as described, TD should conduct a review with the bus company to see whether the journey time of individual bus routes should be adjusted, the routes should be revised or bus route rationalisation should be implemented. Otherwise, TD should clarify and inform the public of the actual situation.

### *Traffic Congestion and Lost Trips*

27. Whether the overall travel speed of buses has decreased in recent years is still to be verified, but traffic congestion has certainly aggravated the problem of lost bus trips. Over the past five years, the rates of lost trips caused by traffic congestion as recorded by all the bus companies were as follows:

<b>Bus company</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
KMB	0.4%	0.4%	0.5%	0.6%	0.7%
Citybus 1	0.6%	0.6%	0.9%	0.9%	1.0%
Citybus 2	0.1%	0.1%	0.1%	0.2%	0.2%
NWFB	0.7%	0.6%	0.9%	1.2%	1.3%
LW	0.0%	0.0%	0.0%	0.0%	0.0%
NLB	0.0%	0.0%	0.0%	0.0%	0.0%

As seen from these figures, three major bus companies recorded an increasing trend in their lost trip rates caused by traffic congestion.

## *Causes of Traffic Congestion*

### *Growth in the Number of Private Cars*

28. TD has kept a close watch on traffic congestion in relation to the increasing number of vehicles. In 2011, the Administration increased the first registration tax for private cars to halt the rising trend.

29. In 2008 and 2012, there were 575,106 and 653,010 registered vehicles respectively. This showed an increase of 77,904 vehicles (around 13.5%), of which 71,556 were private cars (amounting to 91.9% of the total increase in the number of vehicles) while the growth of franchised buses was negative.

30. Over the past five years, there was no significant increase in the total number of vehicles or the total length of carriageways in Hong Kong. In 2008 and 2012, the total lengths of public carriageways were around 2,040 km and 2,090 km respectively.

31. TD indicated that the actual increase in traffic flow would not be in line with that of the number of vehicles because transport facilities have their maximum capacity. Even though the total number of vehicles has increased, there may be less vehicles running on the roads because of the expected congestion and delays. This means an increase in the total number of vehicles may not lead to traffic congestion and the growth rates of road networks and vehicles may not be proportional. We consider that TD should closely monitor the situation and assess whether the increasing number of vehicles will cause traffic congestion and thus affect the travel speed of buses.

### *Illegal Parking of Vehicles*

32. In general, illegal parking is also one of the causes of traffic congestion. On receipt of complaints about illegal parking that causes obstruction to buses, TD will request enforcement action by the Police at the road section concerned. When bus operations are affected by illegal parking at a certain road section, TD will implement traffic management measures, rationalise the bus routes or adjust the bus schedules to reflect the actual journey time of the bus routes.

33. In 2011 and 2012, TD implemented improvement measures at a total of 17 locations where illegal parking had caused obstruction to buses. Such measures included requesting enforcement action by the Police and implementing appropriate traffic management measures at locations that warranted improvement. Moreover, bus companies have also approached the Police directly to request stringent enforcement actions at certain locations. TD believed that there had to be strong support from the Police to ensure the effectiveness of traffic management measures.

34. As most bus routes are planned along trunk roads where restricted zones are usually designated to prohibit loading/unloading and pulling over of vehicles, TD did

not regard the serious problem of illegal parking as a cause of lost bus trips. In this connection, our investigators have conducted site inspections at a number of locations and found that illegal parking during the specified time periods of restricted zones is common in some districts. Sometimes, it can cause serious obstruction to the buses stopping there or running through. We believe that the state of illegal parking may change after the service schedule is prepared. TD should, therefore, review the state of illegal parking and its impact on buses jointly with the bus companies and other Government departments concerned from time to time in order to work out improvement measures.

### ***Implementation of Improvement Measures***

35. To ensure more stable bus service frequencies, TD will study improvement measures with the bus companies. Such measures include adjusting bus journey time and rationalising bus routes.

#### *Adjusting Bus Journey Time*

36. Road condition can change because of social and economic development and the transport infrastructure. It may sometimes prevent buses from completing their journeys on schedule, thus resulting in lost or delayed trips. Where necessary, bus companies will apply to TD for adjusting the journey time to reflect the actual situation. Based on its observations from the routine monitoring of the bus companies, TD may also require the companies to make adjustment where appropriate.

#### *Bus Route Rationalisation*

37. Every year, TD reviews with the bus companies their bus route networks to identify those routes suitable for rationalisation in order to enhance the networks and relieve traffic congestion. In rationalising bus routes, TD is required to first consult the District Councils of the affected districts and revise the proposals if necessary. Duration of such consultation process may vary depending on the complexity of each proposal, the number of objections received and whether many districts are involved.

38. According to the data between June 2010 and May 2013, only less than 60% of the bus route rationalisation proposals submitted by TD to District Councils were implemented in the end. The implementation rate was low. We understand that bus route rationalisation (especially those proposals involving reduction in bus services) will inevitably cause inconvenience to passengers. However, allowing excessive buses to run on the roads would not only create traffic congestion but also aggravate the problem of air pollution. If the patronage of the bus routes concerned is low, it may increase costs and the likelihood of fare increase by bus companies. Hence, TD must balance the interests among different stakeholders. In fact, bus route rationalisation requires the patience, cooperation and support of various parties. We consider that TD should step up its publicity of bus route rationalisation and let the public know about the significance and advantages of such arrangements.

**Concluding Remarks on Traffic Congestion**

39. We understand that traffic congestion is not what the bus companies can control. Given that it is one of the major causes of lost or delayed bus trips, TD is duty-bound to tackle the problem. TD should, therefore, closely monitor the impact of increase in the number of vehicles on bus operations, as well as exercising tighter control on such lost and delayed trips and stepping up the publicity of bus route rationalisation.

**Shortage of Bus Drivers**

40. Another major cause of lost bus trips is the shortage of drivers. In the past five years, the rates of lost trips caused by this shortage were as follows:

<b>Bus company</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
KMB	1.2%	1.6%	4.4%	5.2%	2.6%
Citybus 1	0.2%	0.3%	0.2%	0.3%	0.8%
Citybus 2	0.1%	0.1%	0.1%	0.2%	0.2%
NWFB	0.3%	0.2%	0.4%	0.7%	1.1%
LW	0.1%	0.0%	0.3%	1.6%	2.1%
NLB	0.0%	0.0%	0.0%	0.0%	0.0%

41. The problem of lost trips caused by the shortage of bus drivers was particularly serious in 2010 and 2011 and a leading bus company (KMB) was most seriously affected. Meanwhile, the same problem in another bus company (LW) was becoming more serious in 2011 and 2012.

42. All bus companies retain a certain number of reserve drivers to take the place of drivers who are temporary absent from duty or on leave. Nevertheless, lost trips still occur due to staff wastage and failure of bus companies to quickly recruit new drivers. Since training for new recruits takes time and some reserve drivers are not familiar with certain bus routes, bus companies may have difficulties in finding the right driver for the bus routes even if they have retained reserve drivers. TD and senior management of the bus companies have pointed out that the two major reasons for the shortage of drivers are changes in the labour market that made “bus driver” a relatively unattractive job and the increasing turnover rate of serving drivers. TD had discussed the issue with the management of the bus companies concerned, and the latter implemented a number of improvement measures in 2011 and 2012. The situation has improved since then.

43. Nonetheless, the shortage of bus drivers has remained a problem and it is becoming more serious in three bus companies. TD should take the matter seriously. In KMB's case, it was definitely not desirable that the company needed two years to improve the problem of lost trips caused by this shortage. Since it is the bus companies' responsibility to employ adequate drivers and this is within their control, TD should act quickly and urge the companies to solve the problem whenever there is any hint of a shortage.

### **Inadequate Buses and Vehicle Breakdowns**

44. Lost trips are to a certain extent caused by inadequate buses and vehicle breakdowns and both factors are within the control of bus companies. We consider that TD should discuss with the bus companies the major reasons for inadequate buses and vehicle breakdowns and work out appropriate improvement measures.

### **“Other Reasons”**

45. Quite a number of lost trips are due to “other reasons” (see **para. 24**). We consider that TD should carefully analyse the reasons which are now grouped under “other reasons” and find a solution to solve the problem of lost trips where appropriate.

### **“Phantom Buses”**

46. In mid-2012, there was newspaper coverage about a franchised bus company trying to quickly “doctor the records” by sending buses to travel to the terminus directly from a nearby bus stop and then count it as a full trip. Such bus services were described by the media as “phantom buses”.

47. In response, TD immediately took a number of follow-up actions and examined some routes of the bus company concerned. According to TD, no concrete evidence was found after investigation to prove that the bus company had arranged those so-called “phantom buses” to run on the routes.

48. We consider such allegation of “phantom buses” a serious accusation. TD should follow closely the media coverage, launch an investigation and inform the public of its findings where appropriate.

## **Handling Bus Complaints**

49. As regards complaints about bus services relating to irregular service frequencies, lost trips or delays, TD will require the bus companies concerned to give an explanation and submit their relevant operational records for examination. Meanwhile, TD will generally issue reminder letters to urge the companies to improve. Depending on the situation, TD may also conduct surveys on the bus routes.

50. Where non-compliance with the service schedule is found in a bus company and the reasons for lost trips or irregular service frequencies are beyond the control of the bus company (e.g. traffic congestion and road accidents), TD will work out improvement measures with the company if necessary.

51. If the reasons for lost trips or irregular service frequencies are within the control of the bus company (e.g. shortage of bus drivers and buses and vehicle breakdowns) and the company fails to provide a reasonable explanation or make prompt improvement, TD will issue another reminder letter to demand immediate improvement measures. Should the problem persist, TD will issue a warning letter.

52. TD has no rigid rules on when such warning letters should be issued. It depends on how persistent and serious the problem is.

53. Upon receipt of a written complaint, TD will issue an acknowledgement in 5 working days, followed by a reply to the complainant within 10 working days. For complicated cases, an interim reply would be issued before giving a substantive reply within 21 working days. While exceptionally complicated complaint cases might require a longer time to process, TD would explain the reasons to the complainant as appropriate.

### ***Case Studies***

54. After collecting the views from the general public and examining the details of complaint cases, this Office has summarised below the public's dissatisfaction towards TD's complaint handling procedures:

- TD merely referred their complaints to the bus companies without taking up any investigation itself;
- the public had doubts over how TD verified the veracity of the information provided by the bus companies in response to complaints;
- TD took too long to respond to complaints; and
- TD failed to solve the problems of lost or delayed bus trips.

55. We had selected a number of complaint cases for more detailed examination. The following table is a summary of our observations in three of those cases.

Case	Our Observations
Case 1	<ul style="list-style-type: none"> <li>● TD actually checked the operational records submitted by the bus company earlier and conducted route surveys. Its response time generally met the requirements of its internal guidelines.</li> <li>● The complainant had lodged similar complaints time and again within a year or so, but TD only treated them the way it did a single complaint. Each reply, citing the content of the complaint in hand, was in the same format and pattern: giving an explanation for the irregular service frequencies, informing the complainant of the investigation results, and undertaking to continue to monitor the situation. There was no mention of specific improvement measures or expected service improvements. Besides, its replies were mostly a repetition of earlier responses. No wonder the complainant felt aggrieved and made persistent complaints.</li> </ul>
Case 2	<ul style="list-style-type: none"> <li>● During the initial stage of TD's investigation, the bus company admitted to bus drivers taking leave and traffic accident being the causes of irregular service frequencies. So there was no need for TD to conduct more in-depth investigations into the causes of individual complaints. It was commendable that TD not only sought an explanation for individual cases, but also conducted route surveys and scrutinised the lost trip rates of the bus routes concerned in order to obtain an overall picture of the problem of lost trips.</li> <li>● Nevertheless, TD failed to take further follow-up actions when bus drivers taking leave had repeatedly led to irregular bus services. That was far from satisfactory.</li> </ul>
Case 3	<ul style="list-style-type: none"> <li>● TD did not merely refer the case to the bus company concerned, it also checked the operational records submitted by the company earlier, and conducted route surveys where warranted. When the complainant raised doubts, TD was also serious enough to cross-check in different ways whether the explanation given by the bus company was true. It was also able to clear the doubts raised by the complainant on certain matters.</li> <li>● As TD failed to address effectively the complainant's concern over the problem of lost and delayed trips, or to explain</li> </ul>

Case	Our Observations
	<p>clearly in its replies the mid- and long-term improvement measures it would take, the complainant remained dissatisfied with TD's responses.</p> <ul style="list-style-type: none"> <li>• Although TD could not meet its internal performance pledges every time when replying to the complainant, that was understandable because some of the complaints were more complicated and TD had to ask the bus company several times for explanations and additional information, hence a longer time in issuing replies. Nevertheless, TD officers should have followed internal guidelines and issue interim replies to explain to the complainant as appropriate.</li> </ul>

***Our Overall Observations of TD's Complaint Handling***

*Investigation and Verification*

56. Resource constraints meant that TD officers could not possibly verify all the information provided by the bus companies or arrange for route surveys on each and every complaint. However, if a certain route had already attracted a large number of complaints, or when a complainant had lodged the same complaints repeatedly, then TD should consider verifying the information provided by the bus company. Its reply to the complainant should give a full explanation in order to address the complainant's concerns.

57. Currently, TD does not have any guidelines to help its officers to determine in what circumstances verification of information or site investigation would be warranted.

*Response Time*

58. It is understandable that for more complicated cases, TD needed to ask several times for explanation and further information from the bus companies. Therefore, it would take more time before issuing replies to the complainants. Nevertheless, interim replies should be issued as appropriate.

*Replies to Complainants*

59. For most of the complaint cases, TD officers had actually conducted proper investigations and tried their best to provide answers to members of the public. However, they remained dissatisfied because, after all, the problem of delayed trips had not been really resolved.

60. In its replies to the public's complaints about lost bus trips, TD did not mention the overall lost trip rates of the bus routes concerned. It also did not have a full picture of the extent of the problem of delayed trips because of inadequate data. Only generalised replies could be made in response to most of the complaints. This would just lead to doubts over whether TD had followed up the complaints seriously. We consider that in replying to complainants, TD should try its best to provide sufficient and specific information and data. A detailed explanation of its follow-up actions can also help to clear their doubts.

### **Overall Comments and Recommendations**

61. The results of this direct investigation revealed that there are three major inadequacies in TD's mechanism for monitoring the frequencies of bus services:

- great discrepancy between the lost trip rates as perceived by the general public and those as recorded by TD;
- failure to make good use of the operational data provided by the bus companies for conducting in-depth analysis of issues of public concerns such that monitoring of bus services can be strengthened; and
- deficiencies in the current system of sanctions against the bus companies.

62. Furthermore, although TD officers were serious in handling and responding to most of the complaints about lost or delayed bus trips, the lack of substantive answers in their replies to complainants constituted a source of discontent.

63. The Ombudsman has made 14 recommendations to TD. The major ones include:

- (1) to review the current system of sanctions (see **para. 18**)
- (2) to examine the problem of delayed bus trips and conduct relevant data analysis. Where necessary, TD should require the bus companies to include those relevant data as well in their regular submission of operational records (see **para. 20**);
- (3) to quickly review its definition of lost trips and consider calculating lost trip rates separately for different time periods (see **para. 23**);
- (4) to gauge closely if the increase in the number of vehicles would lead to traffic congestion and affect the travel speed of buses (see **para. 31**);

- (5) to step up publicity for bus route rationalisation plans to facilitate their implementation and let the public understand the importance and advantages of such plans (see **para. 38**);
- (6) to continue to monitor the problem of bus drivers shortage in the bus companies. Once there is a hint of such shortage, it should take follow-up actions as soon as possible and urge the bus companies concerned to solve the problem promptly (see **para. 43**);
- (7) to consider drawing up internal guidelines to help its officers to determine in what circumstances verification of information and site investigations should be arranged (see **para. 57**); and
- (8) to try its best to provide sufficient and specific information and data, as well as a detailed explanation of its follow-up actions in its replies to complainants with a view to clearing their doubts. (see **para. 60**).

**Office of The Ombudsman**  
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