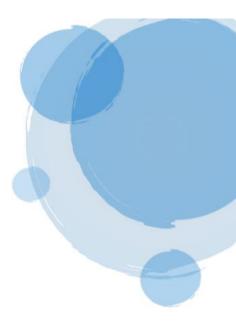


M/21/009 – CityLink / GoBus

Galway Chamber Submission



ABOUT GALWAY CHAMBER

Galway Chamber of Commerce has been in existence for 230 years and currently has around 500 members employing approximately 27,000 people in the region.

Our membership covers all strata of business size – from sole traders to companies employing thousands of people.

We are a privately constituted organisation, that works for the interests of businesses, and for the economic development of the City and Region.

Our Vision Statement: 'Galway at the leading edge' The message from this vision statement is that Galway will strive to be the best at whatever it undertakes, to achieve excellence in everything, to be to the fore in new developments and to be the leading location in every endeavour it undertakes. Therefore, our Mission is to: "Make Galway the leading location for business, investment and people"

Our activities include influencing decisions and lobbying on behalf of businesses, providing opportunities for business networking, export documentation, trade information, business promotion & support and encouraging mutual business support between members.

M/21/009 - CITY LINK / GOBUS

Galway Chamber will remain a neutral party regarding the proposed acquisition by ComfortDelGro Irish Citylink Limited of sole control of the GoBus business currently operated by the Cummer Bus Group Limited and various of its subsidiaries.

Our feedback on the current bus services is as follows:

- The privately-operated bus services to Galway from Dublin Airport and Dublin city centre have played a critical role in the life of Galway city and surrounds for many years.
- The frequency of the services to the Airport and Dublin city have made both destinations readily accessible to people across Galway and surrounding counties and opened-up Galway to thousands more visitors.
- They are an important service to Galway families whose breadwinners need to work
 in Dublin, or with children working or studying in the capital, allowing them to return
 with greater frequency at an affordable cost; certainly much more so than before
 these services operated.
- They bring thousands of visitors to the West each week and tens of thousands at peak periods. Many of these would have found Galway difficult to access otherwise given the infrequency, cost and duration of services available with the publiclyowned road and rail operators.

- The services make Dublin Airport much more accessible for people from the West who need to travel for business or for leisure as well as enabling the West as a 'first-stop' tourist destination for overseas visitors.
- During more normal times, Galway hosts over 10,000 third-level students who are not from the city or immediate area. Many of them use these bus services to return home at weekends and/or to attend college when needed.
- Bus Éireann recently stopped its non-stop service between the cities meaning that it is no longer a viable alternative for most passengers who want as short a journey time as possible.
- For each of these cohorts the frequency and lower cost of the services run by Go Bus and CityLink is vital. A reduction in frequency or an increase in cost will result in a falling usage as the alternative public offerings are not as attractive.
- These services are an important driver of the economic and social life of the region as well as a having a significant positive impact on carbon emissions. Without these services many people would use private transport, increasing both carbon footprints and traffic congestion.
- While all services between the locations do not operate at full capacity all of the time, they do generate sufficient business to make most journeys profitable for the operators most of the time.
- Since Bus Éireann is no longer a competitor on these non-stop routes, this merger
 has the potential to create a monopoly provider unless measures are put in place to
 reduce the potential for monopolistic behaviours. For example, with only one
 operator, there are potential opportunities for predatory pricing at peak times (e.g.,
 for major events, concerts, matches, etc. in either Dublin or Galway). Such practices
 would reduce the attractiveness of Galway as a destination for domestic and foreign
 visitors or the accessibility of events in the capital for Galway residents.
- A condition of CCPC approval must be a retention of the same number of services from Dublin Airport and City to Galway and some control on pricing to prevent a monopoly operator potentially taking advantage of its position. This could be achieved by making a viable selection of route licences available to a new, suitably qualified operator on the Galway-Dublin/Dublin Airport routes.