

**Comments Template on
Discussion Paper on Sponsor Support Technical Specifications**

**Deadline
31 October 2013
18:00 CET**

Name of Company:	ASSOCIATION OF TRAIN OPERATING COMPANIES (ATOC)	
Disclosure of comments:	Please indicate if your comments should be treated as confidential:	Public
<p>Please follow the following instructions for filling in the template:</p> <ul style="list-style-type: none"> ⇒ Do not change the numbering in the column "reference"; if you change numbering, your comment cannot be processed by our IT tool ⇒ Leave the last column <u>empty</u>. ⇒ Please fill in your comment in the relevant row. If you have <u>no comment</u> on a question, keep the row <u>empty</u>. ⇒ Our IT tool does not allow processing of comments which do not refer to the specific numbers below. <p>Please send the completed template, in Word Format, to DP-13-001@eiopa.europa.eu</p> <p>Our IT tool does not allow processing of any other formats.</p> <p>The numbering of the questions refers to Discussion Paper on Sponsor Support.</p>		
Reference	Comment	
General Comment	<p>To illustrate the importance of looking at sponsor support "in the round", within the Railways Pension Scheme the Franchised Train Operating Companies are an employer constituency with a significant proportion of the overall active membership. These companies arose from the privatisation of the UK rail industry under a complex legislative framework and associated arrangements with the Department for Transport, a department of the UK government. This framework, including provisions for the periodic retendering of franchises by the UK government, in turn flows through to the basis of support offered by these companies to the sections of the Scheme which they sponsor. The legislative framework and associated provisions therefore need to be properly and</p>	

**Comments Template on
Discussion Paper on Sponsor Support Technical Specifications**

**Deadline
31 October 2013
18:00 CET**

carefully considered in detail to understand the strength of support offered to the relevant sections of the Scheme.

ATOC would also draw your attention to the Railways Pension Trustee Company Limited (RPTCL) submission on this discussion paper for the purpose of expressing our full endorsement and support; we have been able to read their submission and also discuss the content with RPTCL officials in detail.

Q01.

Q02.

Q03.

Q04.

Q05.

Q06.

Q07.

Q08.

Q09.

Q10.

Q11.

Q12.

Q13.

Q14.

Q15.

Q16.

Q17.

Comments Template on Discussion Paper on Sponsor Support Technical Specifications		Deadline 31 October 2013 18:00 CET
Q18.		
Q19.		
Q20.		
Q21.		
Q22.		
Q23.		
Q24.		
Q25.		
Q26.		
Q27.		
Q28.		
Q29.		
Q30.		
Q31.		
Q32.		
Q33.		
Q34.	<p>What other improvements could be made to the suggested approach?</p> <p>ATOC believes that sponsor support is multi-dimensional, long term and does not lend itself to specific numerical calculations and answers. Instead, sponsor support needs to encompass a very broad range of variables including market, financial, legal, contractual, scheme membership and circumstantial factors. Within the group of 24 Franchised Train Operating Companies there are several factors which mark the companies out as different from other employers, even within those also in the Railways Pension Scheme. Within the Railways Pension Scheme the Franchised Train Operating Companies are an employer constituency with a significant proportion of the overall active membership. These companies arose from the privatisation of the UK rail industry under a complex legislative</p>	

**Comments Template on
Discussion Paper on Sponsor Support Technical Specifications**

**Deadline
31 October 2013
18:00 CET**

framework and associated arrangements with the Department for Transport, a department of the UK government. This framework, including provisions for the periodic retendering of franchises by the UK government, in turn flows through to the basis of support offered by these companies to the sections of the Scheme which they sponsor. In particular, and uniquely, the Train Operating Companies have a fixed duration of franchise which includes a highly regulated process for the appointment of a new employing company at franchise end, and also the Train Operating Companies operate on a shared cost basis, employer and employee. The legislative framework and associated provisions therefore need to be fully evaluated in detail to understand the strength of support offered to the the Train Operating Companies sections in the Railways Pension Scheme.

Q35.

Q36.