Position Paper

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Multi-modal Digital Mobility Services Regulation – roadmap feedback

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CER members realise that, while national journeys are quite easily arranged, today booking a train ticket for an international journey can leave much to be desired. Therefore, the railway undertakings committed to improve international ticketing for rail in their Ticketing Roadmap. Our vision of ticketing is that the passengers will have a seamless user experience when searching, selecting and buying their railway services. European railways have a plan to achieve many elements of the vision already by 2025 at the latest, which we believe is both an ambitious and realistic plan. We appreciate any support that the Commission can provide in helping us to reach it.

In order to achieve seamless ticketing, sector-based solutions should be supported and considered as the starting point, when improving multimodal ticketing. Rail is already working with other stakeholders, like ticket vendors, to ensure transparency and better service to our clients. It is also worth pointing out that no organization willing to join in these efforts was ever refused.

Mobility providers should be allowed to freely negotiate their pricing policy and we do not agree that tickets could be re-sold at different prices without prior agreement. Under the same objective, through-tickets are mentioned as something lacking in rail services today. In EU legal obligations on through-tickets already exist and such tickets are widely offered, while the sector solution Open Sales and Distribution Model (OSDM) is further facilitating through ticketing between different railway undertakings and ticket vendors. On top of OSDM, CER members have committed themselves to go beyond the current legislation, e.g. with the Agreement on Journey continuation (AJC). Furthermore, some European passenger operators have implemented the Hop On The Next Available Train (HOTNAT), which is open to all operators. Any kind of future legislation on this topic should take those agreements into consideration and not invent something new and not fit for purpose.

We expect the Commission proposal to provide a legal framework to maximize efficiency and transparency of these solutions, without extra administrative burden. It should be more clearly stated that extra administrative obligations will not be put in the regulation as it would hamper the attainment of frictionless multimodal ticketing. Interoperability should be the first course of action in order to achieve cost effective solutions; only in extreme cases should standardization be an option, when ensuring EU-wide multimodal ticketing.

We need to avoid the creation of only one or two online MMDMS platforms, which would automatically become gatekeepers, resulting in a platform economy with the risk of (paid) algorithms deciding which is the preferred mobility solution. The European Union should take the many challenges in regulating digital mobility services into account before proposing new regulation. While digitalization has eased the life of European citizens, it brought with it yet unsolved questions of transparency, both on the side of data collection and analysis, as well on the side of using that data to influence the consumer.

We fully support the Commission objective to enhance the efficiency and sustainability of the transport system. It is a step into the right direction and informing passengers of the impact of their mobility choices is something the rail sector has been advocating for years. It is important to mention that only raising awareness has limited effects. To have a systemic and holistic approach to sustainable mobility, we need to achieve a full equal level playing field for all modes. Please note that safety, convenience, ease, speed and cost are all important elements for the passengers when choosing their mobility solution and there is no silver bullet when it comes to achieving modal shift.

CER members are looking forward to engaging with the Commission in order to achieve seamless ticketing across Europe.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter @CER_railways or LinkedIn.

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