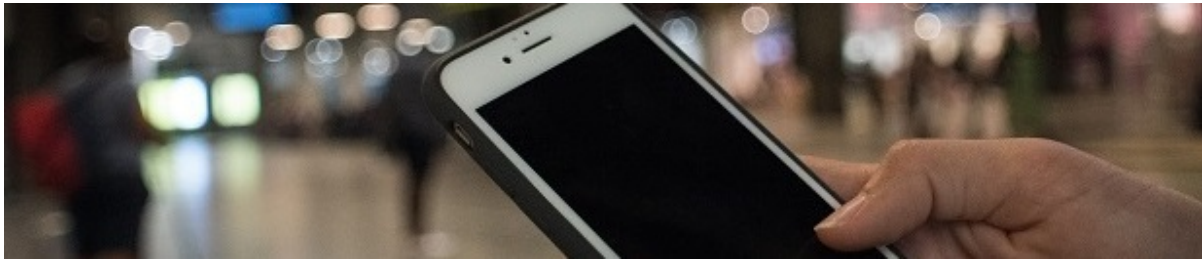


Multimodal digital mobility services

Fields marked with * are mandatory.



Introduction

Multimodal digital mobility services (open public consultation)

Planning and buying tickets for journeys combining different operators or means of transport is often facing barriers in terms of lacking information and limited options, especially when travelling cross-border. Multimodal digital mobility services, such as route-planners or ticket vendors, help to compare different travel options, choices and prices, and in some cases facilitate the purchase of mobility products.

The goal of the public consultation on multimodal digital mobility services (MDMS) is to allow the general public and all stakeholders to express their views in a structured way on the current state of play and needs for additional policy action at European level. The consultation helps to better understand the concerns of EU travellers as regards information and ticketing applications and whether further EU action is necessary in this field to ensure a smooth use when travelling, particularly across borders.

The Commission announced an initiative on multimodal digital mobility services in the Sustainable and Smart Mobility Strategy (Action 37). Such an initiative would also support a shift towards the most sustainable transport modes. Further discussions will be held through targeted consultations and via a new expert group (European Forum on Multimodal Passenger Mobility).

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch

- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Delphine

* Surname

GRANDSART

* Email (this won't be published)

delphine.grandsart@epf.eu

* Organisation name

255 character(s) maximum

European Passengers' Federation

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

532739823521-44

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|--------------------------------------|--|-------------------------------------|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |

- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
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- Aruba
- Australia
- Austria
- Azerbaijan
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- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
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- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
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- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
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- Tanzania
- Thailand

- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
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- Russia
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
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- United States
- United States Minor Outlying Islands
- Uruguay
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- Venezuela
- Vietnam
- Wallis and Futuna

- Curaçao
- Laos
- Rwanda
- Western Sahara
- Cyprus
- Latvia
- Saint Barthélemy
- Yemen
- Czechia
- Lebanon
- Saint Helena
- Zambia
- Ascension and
Tristan da Cunha
- Democratic
Republic of the
Congo
- Lesotho
- Saint Kitts and
Nevis
- Zimbabwe
- Denmark
- Liberia
- Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

This consultation is divided in two sections:

- a general section for travellers
- a detailed section addressing detailed issues on Delegated Regulation (EU) 2017/1926 and market challenges for multimodal digital mobility services.

* Let's begin! Which questionnaire would you like to fill in? (you can select both)

- General section (for travellers and citizens)
- Detailed section (for experts and stakeholders)

General section (travellers)

This public consultation aims to better understand the use of digital services when planning, booking and purchasing multimodal transport services in the EU.

*** 1) When you plan a trip, do you find it difficult to get information on travel options online?**

- Yes.
- No.

1a) If yes, what are the problems you encountered?

You can select multiple answers.

- I could not find sufficient information digitally on the mobility options to plan my trip.
- The price of the trip was not available, or only for parts of the trip.
- There was no or insufficient information on transferring to other modes (such as transfer times or available transport services at the destination).
- I could not find information on whether bicycles are allowed on-board or how to book a space for my bicycle.
- There was no information on potential journey continuation or the entity responsible in case of a disruption (such as a missed connection).
- I could not find information on the carbon footprint of the different mobility services on offer.
- I had to visit several different websites/apps to get information about the different options.
- There was no or insufficient information on the accessibility of the station /airport/bus terminal for passengers with disabilities and/or reduced mobility.
- The information was not available in an accessible format for visually impaired users.
- Others – please explain.

*** 2) Have you experienced difficulties when booking and purchasing tickets /mobility services for a trip combining different modes of transport (bus, rail, air, ship/ferry) online?**

- Yes.
- No.

*** 2a) If yes, which difficulties did you face?**

You can select multiple answers.

- The mobility product could not be booked and/or purchased online.
- The ticket could not be retrieved digitally (e.g. as an e-ticket or via an app). The booking required a paper ticket at the ticket desk or printing the ticket at home.
- Difficulty to find and compare all the available prices/offers for the journey chosen.
- I had to book the different parts of the journey through different websites.
- I needed multiple tickets for the journey or the journey was not covered by one ticket.
- Difficulties with booking through an app or website because it is located in another Member State (e.g. difficulties with the language, difficulties with filling in personal data, difficulties with the means of payment).
- Others - please explain.

*** 3) Do you use mobile applications/websites to plan and book your trips?**

- Yes.
- No.

3a) If yes, which applications and websites do you use for trips within the EU? Please separate entries by commas (e.g.: operators' applications, Skyscanner, Trainline, Citymapper...)

200 character(s) maximum

Operators' websites and third party websites

3b) Why do you use these applications?

- These applications enable my planning only, I had to use another application for the booking.

- These applications enable my planning and booking.
- These applications enable my planning, booking and provide me with relevant information during the trip in case of delays or missed connection.

3c) The applications you use provide you with information on (if none, leave empty):

You can select multiple answers.

- Carbon footprint of your journey.
- Accessibility of the trip (in case of reduced mobility, special needs or impairments) and booking of assistance services.
- Passenger Rights (right to compensation in case of delays/cancellations; right to re-routing, etc.).
- Information about cycling/walking alternatives/other transport means.

3d) If you are visually impaired, is the information available in an accessible format?

- Yes.
- No.
- Not applicable.

Detailed section

The detailed questionnaire is open to all participants, but addresses mainly expert views with specific questions on the current legislation and the different objectives and options.

*** 1) Please specify which interests you (the organisation on behalf of which you respond) represent**

- National public authorities (transport ministries, agencies)
- Regional or local public authorities / public transport authorities
- Public transport operator
- Private transport operator
- Digital mobility service providers (travel intermediaries, travel information services, ticket vendors, global distribution systems, metasearch engines, Mobility-as-a-Service applications)
- Car rental and/or car sharing service provider
- Micromobility providers (bikeshare, e-scooter, scooter etc.)

- Digital solution providers
- Digital map providers
- Research/Academia/Consultancies
- Societal interests and/or consumer rights
- Others (please specify)

Delegated Regulation (EU) 2017/1926

Currently, Delegated Regulation (EU) 2017/1926 on EU-wide multimodal travel information services establishes the necessary specifications to ensure that multimodal travel information services are accurate and available across borders to users.

*** 2) In your view, how fit for purpose is the policy on multimodal travel information services at EU level as established by the Delegated Regulation (EU) 2017/1926 to support the uptake of these services?**

- Very relevant
- Relevant
- Irrelevant
- Very irrelevant
- No opinion

3) In your view, what is the EU-added value of the Delegated Regulation (EU) 2017/1926 in comparison with what could be achieved at Member States national and/or regional level activities?

600 character(s) maximum

For passengers, different national and regional systems represent a significant barrier to obtaining optimal information on timetables and fares. Access to data – on timetables, but also fares – is an essential enabler for creating multimodal integrated information, ticketing and payment systems. It allows service providers – this can be transport operators, or third parties – to put together travel (MaaS) packages combining different modes to enable door to door travel and offering passengers the possibility to book and pay for all legs of their multimodal trip in a one stop shop.

Data availability and data sharing

4) If you make use of multimodal travel data, please rank these access points of data in terms of importance to your work?

	1st (most important)	2nd	3rd	4th (least important)
National Access Points	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Operator / data producer website	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Third-party tool / data intermediary	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others - please explain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4a) If you selected others, please explain:

200 character(s) maximum

5) Which additional data types should be made accessible on the EU National Access Points to facilitate sharing of multimodal data?

You can select multiple answers.

- data on occupancy of the vehicle
- dynamic data on fare availability
- dynamic data on seat availability
- data on disruptions (all modes)
- real-time status information (e.g. estimated arrival times)
- availability of parking spaces
- historic data (beyond statistical purposes currently covered), e.g. data on delays for the submission of passenger complaints)
- Others (please specify)

5a) If you selected others, please explain:

200 character(s) maximum

Accessibility (for PRM)

6a) Regarding data accessibility and data sharing, have you faced any of the following challenges?

You can select multiple answers.

- Limited amount of data
- Limited data quality
- Lack of open standards (e.g. standards for booking and ticketing interfaces)
- Lack of willingness to enter into commercial agreements to provide data
- Lack of access to real-time data
- Lack of access to other type of data (please explain)

6b) Do you have any comments on these problems or other potential problems that should be considered?

600 character(s) maximum

There is a need to integrate historic, static and dynamic data from both users and transport providers. Data must not only be available but also reliable and coherent.

For the usability of real-time data, their fastest possible transmission to suitable interfaces is essential. Open standards and interoperability are needed to ensure scalability and 'roaming' across borders. Ownership and governance of data is a crucial topic to be addressed for all involved parties (including operators, ticket vendors, infrastructure managers, authorities, ... and end-users).

7a) What should be the main priorities for a joint European data exchange standard on ticketing (please rank them in order of importance):

	1st priority	2nd priority	3rd priority	4th priority
being future proof and able to provide the basis for ticketing by 2030 and beyond	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
being best able to advance the digitalisation of rail while enabling multimodal ticketing	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
providing a basis for developing multimodal electronic ticketing involving short and long distance, urban and regional offers, within one mode or more	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
being open and transparent, enabling operators, retail and ticket vendors to build on in a fair and non-discriminatory manner.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7b) For each of the above option, please justify your option:

600 character(s) maximum

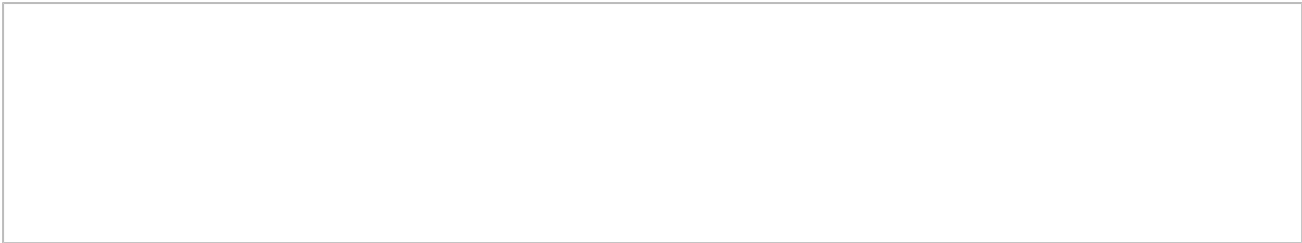
Passengers need a neutral, comprehensive and reliable overview of available travel options to make an informed choice. Buying multimodal tickets should be easy, affordable and offer protection in case something goes wrong.

Access to data on FRAND conditions is a key enabler for this.

An open, multi-player distribution market, based on interoperability, non-exclusive partnerships between transport service providers and aggregators / MaaS providers, will encourage competition both between TSPs and distributors, which would eventually lead to a better offer to end-users.

7c) Should the legislator further mandate data exchange standards for booking and ticketing to meet the multimodality objective, which of them should be mandated in your view? Please justify your choice.

600 character(s) maximum



Market challenges for multimodal digital mobility services

The Commission has identified a non-exhaustive list of problems, objectives and impacts (as explained possible remedying measures in the Inception Impact Assessment) when it comes to the development of multimodal digital mobility services[1]. This consultation seeks to gather your views on these aspects.

[1] "systems providing information about, inter alia, the location of transport facilities, schedules, availability and fares, of more than one transport provider, with or without facilities to make reservations, payments or issue tickets" (e.g. route-planners, Mobility as a Service, online ticket vendors, ticket intermediaries)

Identified problems regarding the commercial relationships between operators and multimodal digital mobility services and sustainability

8a) Please indicate to what extent you agree with the following statements:

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	Neutral / no opinion
Lack of data sharing hampers the deployment of multimodal digital mobility services between modes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Opaque conditions for combining and reselling mobility products (in land and waterborne modes) prevents the development of multimodal digital mobility services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Multimodal digital mobility services do not fully provide sufficient information on the sustainability of travel options	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Multimodal digital mobility services are limited, in particular in the rail sector, due to market power imbalances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fair access for all operators to relevant multimodal digital mobility services is not granted	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited uptake of journey continuation agreements is an element hindering the provision of combined rail offers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8b) Do you have any comment on these problems or other potential problems that should be considered?

600 character(s) maximum

Digital mobility solutions need to be accessible and user-friendly so that also persons with disabilities, elderly people and people with limited digital skills are able to use them. It is important that there are alternatives for those people who are not able to use digital tools.

In the absence of through tickets, there is no guaranteed arrival at the final destination. A missed connection may leave passengers stranded and forced to buy new tickets. Adequate protection is needed for passengers using combinations of different transport modes.

Possible measures to pre-identified problems

9a) When it comes to business-to-business commercial agreements for multimodal digital mobility services in land-based and waterborne modes, how important are these measures for you? Requirements for the commercial agreements on...

	Very important	Moderately important	Not important	Neutral / no opinion
...the type of mobility products that can be re-sold	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...the technical limitations imposed (such as look-to-book ratios)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...the commission fees	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...the marketing conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...the liability towards the passenger (e.g. in case of disruption)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...avoiding misuse of data reuse by third parties (reusing commercially-sensitive information for own interest)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9b) To ensure fair access for all operators to relevant multimodal digital mobility services, how important are these measures for you?

Note: an operator may also simultaneously operate a multimodal digital mobility service

	Very important	Moderately important	Not important	Neutral / no opinion
Mandate neutral display when the service displays offers <i>Neutral display: ranking of mobility offers for instance based on journey time, price, CO2 emissions and avoiding operators to advertise on the display page of the intermediary.</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Establish obligations on the integration, on reasonable terms, of operators willing to be part of a multimodal digital service	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrate a provision to ensure non-discriminatory treatment of the parties across commercial agreements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9c) When it comes to ensuring that multimodal digital mobility services enhance the efficiency and sustainability of the transport system, how important are these measures for you?

	Very important	Moderately important	Not important	Neutral / no opinion
Provide information on carbon footprint of the journey	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Walking and cycling should be part of displayed options (when first-mile and last-mile services are concerned)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish obligations on services to ensure that data on usage of transport services, critical for mobility management, are shared with public authorities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9d) Do you have any comments on these measures or other potential measures to consider?

600 character(s) maximum

The CRS CoC was introduced to ensure that airlines did not promote their own services over those of competitors. Its underlying principles – transparency, fair competition, neutral display – are also relevant for other distribution channels and modes.

Access to transport data on FRAND conditions is a key enabler for creating an open, multi-player distribution market.

New business models are needed that strike a balance between the interests of passengers, transport service operators and distributors / aggregators and, from the consumer side, guarantee data portability.

Relevance of action at European level

10) The objective of this new initiative would be best accomplished...

	Fully agree	Somewhat agree	Somewhat disagree	Fully disagree	Neutral / no opinion
...through legal obligations / legislative action by the European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

...through non-binding guidance or recommendations by the European Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
...through increased funding opportunities from European Union programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
...through increased coordination and harmonisation with other (non-EU) areas of the world	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Final remarks

Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

300 character(s) maximum

You can also upload any document(s) to provide evidence to support your responses

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

11) In addition to this general consultation, targeted follow-up will be organised with key professional stakeholders on certain topics. Would you be interested in participating in this targeted consultation?

- Yes
- No

Contact

move-multimodal-digital-mobility-services@ec.europa.eu

