Multimodal digital mobility services

Link to consultation survey <https://ec.europa.eu/eusurvey/runner/multimodal_ticketing_2021?surveylanguage=en>

Deadline: 23 February 2022

European Commission contact: [move-multimodal-digital-mobility-services@ec.europa.eu](mailto:move-multimodal-digital-mobility-services@ec.europa.eu)

EDF stuff responsible: Mher Hakobyan ([mher.hakobyan@edf-feph.org](mailto:mher.hakobyan@edf-feph.org))

# 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).

# 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?

* EDF - Yes
* No

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

*You can select multiple answers.*

* EDF - 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.
* EDF - 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.
* EDF - I had to visit several different websites/apps to get information about the different options.
* EDF - There was no or insufficient information on the accessibility of the station /airport/bus terminal for passengers with disabilities and/or reduced mobility.
* EDF - The information was not available in an accessible format for visually impaired users.
* EDF - Others – please explain.

### **1b) If you selected others, please explain:** *300 character(s) maximum*

EDF - No single point for information and booking assistance for PRM. No information on wheelchair space. No information related to PRM rights for the whole journey in case I am denied boarding or miss one leg of the journey. Information wasn't accessible according to Directive 2019/882.

### **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?**

* EDF - 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.
* EDF - Difficulty to find and compare all the available prices/offers for the journey chosen.
* EDF - I had to book the different parts of the journey through different websites.
* EDF - 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).
* EDF - Others - please explain.

### **2b) If you selected others, please explain:**

*300 character(s) maximum*

EDF - I had to book assistance for different parts of the journey through different apps/websites/contact points. Difficulty with booking through apps or websites as they don't meet the accessibility requirements of Directive 2019/882.

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

* EDF - 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*

EDF - Accessibility of information should go beyond accessible formats for persons with visual impairment and be accessible according to Directive 2019/882 and include easy to read formats.

3 b) and 3 c) – EDF - skipped

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

* Yes
* EDF- 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

* EDF - Societal interests and/or consumer rights

## **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
* EDF - 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*

EDF - for persons with disabilities, main relevance of Regulation 2017/1926 is related to recital 22 which refers to the relevant accessibility requirements of the European Accessibility Act “to maximise the foreseeable use of travel information services by persons with functional limitations.” However, this is not included in the main text of the Regulation, which is of course a huge shortcoming.

## 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?**

EDF – skipped

1. National Access Points – most important, 2nd, 3rd, 4th (least important)
2. Operator / data producer website - most important, 2nd, 3rd, 4th (least important)
3. Third-party tool / data intermediary - most important, 2nd, 3rd, 4th (least important)
4. Others - please explain - most important, 2nd, 3rd, 4th (least important)

### 4a) If you selected others, please explain:

*200 character(s) maximum*

EDF – skipped

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

### 5a) If you selected others, please explain:

*200 character(s) maximum*

EDF – Data on denied boarding; damaged and lost mobility equipment and assistance animal; presence or absence of assistance provision; accessibility of information or lack of thereof; wheelchair space.

6a) Regarding data accessibility and data sharing, have you faced any of the following challenges?  
*You can select multiple answers.*

* EDF - 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
* EDF - Lack of access to real-time data
* EDF - Lack of access to other type of data (please explain)

### If you selected others, please explain:

*200 character(s) maximum*

EDF – lack of data on accessibility of information; lack of accessible real-time data

### 6b) Do you have any comments on these problems or other potential problems that should be considered? *600 character(s) maximum*

EDF – Lack of accessibility data, of accessible real-time information is an issue. It would be useful to develop a system like the Inventory of Assents under the TSI PRM to assess the gaps in accessibility during intermodal travel. This would help passengers with disabilities be informed of the accessibility barriers before planning their journeys; it would also help transport services track the gaps to consistently improve accessibility over time. Data on denied boarding; damaged, lost mobility equipment and assistance animals; absence of assistance provisions would help inform policy-development.

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

EDF – skipped

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

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

*600 character(s) maximum*

EDF – skipped

### **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*

EDF – skipped

## **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]](#footnote-1). This consultation seeks to gather your views on these aspects.

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:**

EDF – skipped

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

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

*600 character(s) maximum*

EDF – skipped

## 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**

EDF – skipped

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

### **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*

EDF – skipped

* Mandate neutral display when the service displays offers (Neutral display: ranking of mobility offers for instance based on journey time, price, C02 emissions and avoiding operators to advertise on the display page of the intermediary). – Very important – Moderately important -Not important - Neutral/ no opinion
* Establish obligations on the integration, on reasonable terms, of operators willing to be part of a multimodal digital service – Very important – Moderately important -Not important - Neutral/ no opinion
* Integrate a provision to ensure non-discriminatory treatment of the parties across commercial agreements – Very important – Moderately important -Not important - Neutral/ no opinion

### **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?**

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

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

*600 character(s) maximum*

EDF – skipped

## Relevance of action at European level

### **10) The objective of this new initiative would be best accomplished…**

* through legal obligations / legislative action by the European Commission – EDF - Fully agree – Somewhat agree – Somewhat disagree – Fully disagree - Neutral/ no opinion
* through non-binding guidance or recommendations by the European Commission Fully agree – Somewhat agree – Somewhat disagree – EDF - Fully disagree - Neutral/ no opinion
* through increased funding opportunities from European Union programmes – EDF - Fully agree – Somewhat agree – Somewhat disagree – Fully disagree - Neutral/ no opinion
* through increased coordination and harmonisation with other (non-EU) areas of the world Fully agree – EDF - Somewhat agree – EDF - Somewhat disagree – Fully disagree - Neutral/ no opinion

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*

EDF –1) coverage of passenger rights throughout whole journey (e.g. compensation for whole journey if one carrier denies boarding, cancels).

2) fully accessible transport services, information

3) accessible, simple redress, complaint mechanisms

4) single booking of assistance for the whole journey

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

EDF – upload EDF Position on passengers rights in multimodal transport



### **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?**

* EDF - Yes
* No

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) [↑](#footnote-ref-1)