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
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

Mher
Surname
Hakobyan

Email (this won’t be published)
mher.hakobyan@edf-feph.org

Organisation name
255 character(s) maximum
European Disability Forum (EDF)

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.
57868523887-16

Country of origin
Please add your country of origin, or that of your organisation.
- Afghanistan
- Åland Islands
- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Djibouti
- Dominica
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Libya
- Liechtenstein
- Madagascar
- Malawi
- Luxembourg
- Macau
- São Tomé and Príncipe
- Saudi Arabia
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- Libya
- Saint Martin
- Saint Pierre and Miquelon
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
<table>
<thead>
<tr>
<th>Country</th>
<th>Country</th>
<th>Country</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Anguilla</td>
<td>Eritrea</td>
<td>Malaysia</td>
<td>Senegal</td>
</tr>
<tr>
<td>Antarctica</td>
<td>Estonia</td>
<td>Maldives</td>
<td>Serbia</td>
</tr>
<tr>
<td>Antigua and Barbuda</td>
<td>Estonia</td>
<td>Mali</td>
<td>Seychelles</td>
</tr>
<tr>
<td>Argentina</td>
<td>Ethiopia</td>
<td>Malta</td>
<td></td>
</tr>
<tr>
<td>Armenia</td>
<td>Falkland Islands</td>
<td>Marshall Islands</td>
<td></td>
</tr>
<tr>
<td>Aruba</td>
<td>Faroe Islands</td>
<td>Martinique</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>Fiji</td>
<td>Mauritania</td>
<td></td>
</tr>
<tr>
<td>Austria</td>
<td>Finland</td>
<td>Mauritius</td>
<td></td>
</tr>
<tr>
<td>Azerbaijan</td>
<td>France</td>
<td>Mayotte</td>
<td></td>
</tr>
<tr>
<td>Bahamas</td>
<td>French Guiana</td>
<td>Mexico</td>
<td></td>
</tr>
<tr>
<td>Bahrain</td>
<td>French Polynesia</td>
<td>Micronesia</td>
<td></td>
</tr>
<tr>
<td>Bangladesh</td>
<td>French Southern and Antarctic Lands</td>
<td>Moldova</td>
<td></td>
</tr>
<tr>
<td>Barbados</td>
<td>Gabon</td>
<td>Monoac</td>
<td></td>
</tr>
<tr>
<td>Belarus</td>
<td>Georgia</td>
<td>Mongolia</td>
<td></td>
</tr>
<tr>
<td>Belgium</td>
<td>Germany</td>
<td>Montenegro</td>
<td></td>
</tr>
<tr>
<td>Belize</td>
<td>Ghana</td>
<td>Montserrat</td>
<td></td>
</tr>
<tr>
<td>Benin</td>
<td>Gibraltar</td>
<td>Morocco</td>
<td></td>
</tr>
<tr>
<td>Bermuda</td>
<td>Greece</td>
<td>Mozambique</td>
<td></td>
</tr>
<tr>
<td>Bhutan</td>
<td>Greenland</td>
<td>Myanmar/Burma</td>
<td></td>
</tr>
<tr>
<td>Bolivia</td>
<td>Grenada</td>
<td>Namibia</td>
<td></td>
</tr>
<tr>
<td>Bonaire Saint Eustatius and Saba</td>
<td>Guadeloupe</td>
<td>Nauru</td>
<td></td>
</tr>
<tr>
<td>Bosnia and Herzegovina</td>
<td>Guam</td>
<td>Nepal</td>
<td></td>
</tr>
<tr>
<td>Botswana</td>
<td>Guatemala</td>
<td>Netherlands</td>
<td></td>
</tr>
<tr>
<td>Bouvet Island</td>
<td>Guernsey</td>
<td>New Caledonia</td>
<td></td>
</tr>
<tr>
<td>Brazil</td>
<td>Guinea</td>
<td>New Zealand</td>
<td></td>
</tr>
<tr>
<td>British Indian Ocean Territory</td>
<td>Guinea-Bissau</td>
<td>Nicaragua</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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.
1b) If you selected others, please explain:

300 character(s) maximum

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?

- 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.

2b) If you selected others, please explain:

300 character(s) maximum

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?

- Yes.
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

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.

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 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?

<table>
<thead>
<tr>
<th>Access Point</th>
<th>1st (most important)</th>
<th>2nd</th>
<th>3rd</th>
<th>4th (least important)</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Access Points</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operator / data producer website</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
</tr>
<tr>
<td>Third-party tool / data intermediary</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
</tr>
<tr>
<td>Others - please explain</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
</tr>
</tbody>
</table>

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
- [x] dynamic data on fare availability
- [x] dynamic data on seat availability
- [x] data on disruptions (all modes)
- [x] real-time status information (e.g. estimated arrival times)
- [x] availability of parking spaces
- [x] 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
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.*

- [ ] Limited amount of data
- [x] 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
- [x] Lack of access to real-time data
- [x] Lack of access to other type of data (please explain)

If you selected others, please explain:

200 character(s) maximum

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

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):

<table>
<thead>
<tr>
<th></th>
<th>1st priority</th>
<th>2nd priority</th>
<th>3rd priority</th>
<th>4th priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>being future proof and able to provide the basis for ticketing by 2030 and beyond</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>being best able to advance the digitalisation of rail while enabling multimodal ticketing</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
providing a basis for developing multimodal electronic ticketing involving short and long distance, urban and regional offers, within one mode or more

being open and transparent, enabling operators, retail and ticket vendors to build on in a fair and non-discriminatory manner.

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

600 character(s) maximum

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:

<table>
<thead>
<tr>
<th>Fully agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Fully disagree</th>
<th>Neutral / no opinion</th>
</tr>
</thead>
</table>

Lack of data sharing hampers the deployment of multimodal digital mobility services between modes

Opaque conditions for combining and reselling mobility products (in land and waterborne modes) prevents the development of multimodal digital mobility services

Multimodal digital mobility services do not fully provide sufficient information on the sustainability of travel options

Multimodal digital mobility services are limited, in particular in the rail sector, due to market power imbalances

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

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

600 character(s) maximum

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...

<table>
<thead>
<tr>
<th></th>
<th>Very important</th>
<th>Moderately important</th>
<th>Not important</th>
<th>Neutral / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>…the type of mobility products that can be re-sold</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
<tr>
<td>…the technical limitations imposed (such as look-to-book ratios)</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>○</td>
</tr>
</tbody>
</table>
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

<table>
<thead>
<tr>
<th>Mandate neutral display when the service displays offers. 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.</th>
<th>Very important</th>
<th>Moderately important</th>
<th>Not important</th>
<th>Neutral / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Establish obligations on the integration, on reasonable terms, of operators willing to be part of a multimodal digital service</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Integrate a provision to ensure non-discriminatory treatment of the parties across commercial agreements</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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?

<table>
<thead>
<tr>
<th>Provide information on carbon footprint of the journey</th>
<th>Very important</th>
<th>Moderately important</th>
<th>Not important</th>
<th>Neutral / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Walking and cycling should be part of displayed options (when first-mile and last-mile services are concerned)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Establish obligations on services to ensure that data on usage of transport services, critical for mobility management, are shared with public authorities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
9d) Do you have any comments on these measures or other potential measures to consider?

600 character(s) maximum

Relevance of action at European level

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

<table>
<thead>
<tr>
<th></th>
<th>Fully agree</th>
<th>Somewhat agree</th>
<th>Somewhat disagree</th>
<th>Fully disagree</th>
<th>Neutral / no opinion</th>
</tr>
</thead>
<tbody>
<tr>
<td>...through legal obligations / legislative action by the European Commission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>...through non-binding guidance or recommendations by the European Commission</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>...through increased funding opportunities from European Union programmes</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>...through increased coordination and harmonisation with other (non-EU) areas of the world</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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
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