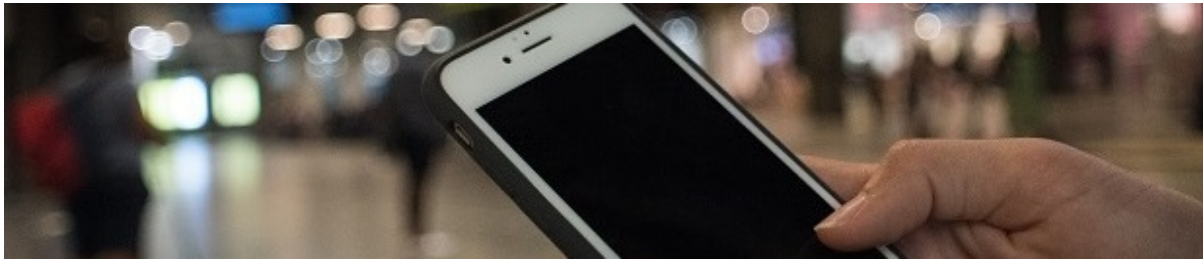


# Multimodal digital mobility services

Fields marked with \* are mandatory.



## Introduction

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### **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

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### \* 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

Otto

\* Surname

Ilveskero

\* Email (this won't be published)

GBTA@grayling.com

\* Organisation name

*255 character(s) maximum*

Global Business Travel Association (GBTA)

\* 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.

\* 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
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- 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
- Greenland
- 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
- Senegal
- Serbia
- Seychelles
- 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
- Syria
- Taiwan
- Tajikistan
- 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
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- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- 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](#)

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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)

## Detailed section

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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)

**1a) If you selected others, please specify:**

*200 character(s) maximum*

Business travel buyers

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## 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*

GBTA believes that Delegated Regulation (EU) 2017/1926 allows for greater harmonization of rules at the European level and ensures a seamless travel experience for business travelers across the EU. In addition, having common rules makes it easier for travel planners to rely on common European standards when it comes to data related to requesting special fares, real-time information on delays and cancellations, but also environmental footprints of different routes and modes. Lastly, harmonized infrastructure will be key to achieving multimodality.

*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)
<a href="#">National Access Points</a>	<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 checked="" type="radio"/>

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

*200 character(s) maximum*

Operator and third-party tool access points are equally important depending on the company structure and if they work closely with operators or with third-party tools.



## 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*

GBTA calls for greater availability of environmental data on modes and routes to help business travelers make sustainable choices. Data on competitiveness and harmonisation of pricing is also needed.

## 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*

Data privacy – both in personal data and company-to-company data sharing – is also a challenge that needs to be taken into account, and the replacement of the EU-US Privacy Shield will need to be a priority to support the smooth flow of multimodal digital mobility services data.

**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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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*

GBTA believes that all four points are equally important and that future-proof legislation must be built around these four pillars. GBTA therefore calls for greater transparency so that every distributor can offer transport services based on fair and non-discriminatory commercial conditions. In addition, GBTA calls for greater digitization of all modes of transport, especially rail, and the development of robust multi-modal e-ticketing services involving short and long distances and within one or more modes.

**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*

GBTA calls for independent distributors to be granted regulated access to schedules and inventory data such as fares and reservations for all modes of transportation with the same range, quality, and level of detail as their own in-house solutions. Additionally, it is essential that access to transportation data pre-trip, during the trip (real-time data on delays, cancellations, and platforms), and post-trip be implemented to facilitate travel. This would increase customer satisfaction and enhance competition.

**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*

GBTA calls on the European Commission to keep privacy issues in mind when developing future-proof legislation for multi-modal digital mobility services in order to increase transparency and the amount of data available without impeding privacy.

*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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Establish obligations on the integration, on reasonable terms, of operators willing to be part of a multimodal digital service	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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*

GBT A believes that the goals of decarbonizing the transportation sector will be achieved through greater multimodality of transportation modes. This can only happen if the entire travel industry value chain has increased access to regulated and transparent data that is essential for distributors and consumers to make cost-effective and sustainable choices. In addition, it is critical that micromobility and walking options that meet first and last mile services are displayed to provide legibility to travelers throughout their journey.

*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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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*

From the business travel sector's perspective, the MDMS framework has to be fit for purpose and be workable with the technology in use in the sector. The framework needs to be binding to all stakeholders, and emphasise the digitalisation of rail and sustainability data to foster multimodality.

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