

To:

Frans Timmermans
Executive Vice-President, European Commission

Adina Vălean
Transport Commissioner, European Commission

Thierry Breton
Internal Market Commissioner, European Commission

Copy:

Henrik Hololei
Director General, DG MOVE

Kerstin Jorna,
Director General, DG GROW

Herald Ruijters
Acting Deputy Director General, DG MOVE

Kristian Schmidt
Director Land Transport, DG MOVE

Brussels, 17 November 2022

Regarding: Call for an ambitious MDMS proposal

Dear Executive Vice-President Timmermans,

Dear Commissioner Vălean,

Dear Commissioner Breton,

The undersigned organizations represent European distributors of passenger rail services, rail entrants and European rail travellers, and we are writing in support of strong European action for a more open and fair rail ticketing framework. Given the crucial 'enabling' role that independent ticket vendors play, **we call on the European Commission to propose an ambitious Regulation on Multimodal Digital Mobility Services (MDMS)¹ as soon as possible.**

The MDMS Regulation represents a cornerstone of the EU's Sustainable and Smart Mobility Strategy. It will make EU-wide multimodal journey planning and buying tickets easier for journeys involving one or more transport operators and/or modes. It also aims to ensure that dominant incumbent rail operators negotiate fairly with digital services wishing to distribute their tickets. We are convinced that the MDMS Regulation can be a real EU success story, because it has the potential to:

1. **Contribute to Europe's sustainability goals** by encouraging modal shift and allowing for easier access to sustainable transport modes;

¹ Inception Impact Assessment on Multimodal Digital Mobility Services, Ref. Ares(2021)6062336

2. **Support cross-border and national mobility**. As with the now-famous Roaming Regulation², this initiative has the potential to unlock train travel throughout the EU. Independent digital ticket distributors are offering something different than incumbents' own sales channels by creating a truly pan-European passenger experience, bringing the European single market for rail to life;
3. **Increase consumer welfare** by providing access to all available offers for transparent comparison, making booking easier and by supporting innovative players who bring new services to the market. This will provide tangible benefits for the lives of all European citizens;
4. **Contribute to the digitalization of the rail sector and market access** by opening the door for innovative digital tools;
5. **Facilitate competition** in the rail market by creating a level-playing field in the vital area of ticket sales, for players of all sizes.

Recent comments by European Commission officials on the importance of solving ticketing issues in rail³ have been highly encouraging. However, the MDMS proposal has been delayed and we are concerned that adoption might not be achieved during the current mandate. **We call on the European Commission to make MDMS a clear political priority and ensure this important framework delivers against its goals and becomes a reality.**

We stand ready to continue assisting and supporting the European Commission's services in developing the MDMS Regulation ahead of the planned publication.

Yours sincerely,



Alliance of Passenger Rail New Entrants in Europe



European Travel Agents' and Tour Operators' Associations



European Passengers' Federation

eu travel tech

eu travel tech



Global Business Travel Association

² [Speech](#) by Commissioner Vălean on the Presentation of the Efficient and green Mobility package (Speech 22/559), [Interview](#) by EVP Timmermans on BNR Nieuwsradio

³ "For rail to become an attractive travel choice for many more passengers, decisive action is needed in the area of ticketing, so that cross-border train tickets become easier to find and book, and more attractive in price. (...) Railway companies and ticket vendors should be able to offer attractive tickets without undue market barriers when accessing existing ticket vending channels, ticket and fare data as well as data and operations in reservation systems", Communication on an Action plan to boost long distance cross-border passenger rail (COM (2021) 810 final), p. 13.