



Regulation proposal on multimodal booking

ECTAA position on neutral display and ranking criteria

ECTAA has strong reservations about Article 7 of the proposed Multimodal Booking Regulation (RMB). **While the European Commission intends Article 7 to guarantee fair, non-discriminatory, comprehensive and consumer-centric travel distribution, it fundamentally misses every single one of its policy objectives by transposing legacy 1980s CRS rules onto independent travel intermediaries (B2C MDMS).**

It reduce consumers' choice by outlawing smart algorithms

The objective of standardizing default rankings around static criteria (duration, price, transfers, emissions) backfires by outlawing the responsive algorithms travelers rely on every day. Instead of protecting consumers, it forces platforms to display impractical itineraries—such as risky 40-minute self-transfers, inconvenient 4:00 AM departures—while **penalizing ranking algorithms tailored to travellers' needs**, such as families (prioritising day-time travel and more luggage allowance), weekenders (maximise time at destination), or disruption risks (proactive risk scoring to prevent missed connections).

It misdiagnoses commercial bias while undermining free price comparison

The objective of eliminating carrier bias misinterprets the current market reality. Unlike legacy airline-owned CRSs, **independent intermediaries own no transport assets** and have no incentive to favour one carrier over another; standard airline commissions have virtually disappeared.

By restricting commercial differentiation and advertising in search displays, **Article 7 dismantles the economic model that finances free, multi-operator comparison shopping for European consumers**, while ignoring that misleading rankings are already strictly prohibited under existing EU law (P2B, DSA, UCPD). It also begs the question, why travel intermediaries need to be regulated more strictly than any other e-commerce platform, such as Amazon, Zalando, etc.

It creates an unworkable double standard on comprehensiveness

The objective of ensuring a "comprehensive, neutral" display creates an impossible legal trap for independent intermediaries. **While Article 7 demands that platforms show a**

complete market offer, it leaves dominant airlines completely free to withhold inventory, promotional fares, and ancillaries from independent channels.

Recommendations for article 7

ECTAA calls on decision-makers to defend a balanced, pro-consumer digital travel distribution market. The regulatory framework must establish a **clear, differentiated approach between independent travel intermediaries—who own no transport assets and have no incentive to discriminate—and carrier-controlled platforms**, where vertical self-preferencing and market foreclosure actually risk harming European consumers. We thus call for:

- **Deletion of default ranking criteria in Article 7 for independent travel intermediaries:** Maintain the EU's established horizontal digital framework (P2B Regulation, Digital Services Act, and Unfair Commercial Practices Directive), which already guarantees algorithmic accountability, clear disclosure of ranking parameters, and transparent labelling of paid advertising without stifling search innovation. Mandatory filter options could be envisaged.
- **Rejection of any "comprehensive display" liability without binding access to content:** Ensure independent platforms cannot be penalized for incomplete displays unless transport operators—particularly strong air carriers—are placed under enforceable obligations to provide access to all fares, timetables, and ancillary services on Fair, Reasonable, and Non-Discriminatory (FRAND) terms.
- **Safeguard of commercial viability and search personalization:** Protect the ability of independent platforms to offer consumer-driven multi-parameter sorting (balancing e.g. price, convenience, satisfaction, on-time performance, party context, and route safety) and legitimate advertising models in default display that keep multi-carrier search tools free and accessible for all European travelers.

