

## Joint statement

### Multimodal Digital Mobility Services – Ambition needed to increase consumer choice and ease sustainable travel

28 February 2023

Today, the European Commission's Directorate General for Transport and Mobility (DG MOVE) presented its vision for a crucial upcoming piece of legislation – the **Regulation on Multimodal Digital Mobility Services (MDMS)**.

The undersigned organisations, representing diverse interests from across the mobility sector (such as consumers, business travelers, rail new entrants, travel intermediaries) express their strong support for this initiative.

We fully share the objective of the European Commission to **make travelers' lives simpler** by facilitating the transparent comparison and combination of transport offers, within and across modes. To live up to the promises of the EU Green Deal, modal shift towards more sustainable transport modes is essential; the MDMS Regulation will provide tools for consumers to travel greener, breaking one of the most frustrating barriers to multimodality. The Regulation will further help Europe break out of closed ecosystems making optimal use of our world-class transport system.

We are convinced that the foreseen **policy measures of the proposed Regulation, as presented by DG MOVE, are fit for purpose**, centering on the respect for fair, reasonable and non-discriminatory (FRAND) relations between large transport operators and multimodal digital mobility services.

**"Access to content"** (i.e. tickets & relevant inventory) of transport operators is the fundamental precondition to enable independent digital mobility services to play their role as consumer transparency tools, giving rise to convenient comparison and combination of all transport offers. These services further ease ticketing for travelers, especially across borders. We are glad to see the need for access to content well-reflected in the Commission's policy measures.

We further commend the Commission's strong push to **address unfair restrictions** imposed by large operators. Ensuring fair commissions for mobility platforms and a regulatory ban on disproportionate marketing restrictions is the right step to make sure that consumers can easily find and book the best offers and connections available, from any transport mode (be it based on price, emissions or travel time). These practices, such as restrictions for meta search engines or pricing restrictions directly impede the ability of consumers to compare offers in a transparent manner and directly penalise travellers opting for multimodal digital mobility services.

It is also rightly recognised that multimodal digital mobility services equally have a responsibility to show offers in an unbiased and comprehensive manner, confident in the fact

that they can compete on a level playing field with the websites of large transport operators. This should be supported by a robust and complete set of multimodal passenger rights.

However, we voice our **strong concerns regarding the presented scope of obligations** for transport operators. To fully achieve its ambitious objectives, the MDMS Regulation must cover relevant players of all modes, meaning those with a certain degree of market power. In our view this specifically includes **obligations for large airline groups and municipal & long distance public transport operators** to facilitate long-distance travel but also door-to-door connections. Such players must not be able to evade their obligation to share data. We therefore urge the European Commission to reconsider its intention to carve them out of the scope of the proposed legislation by introducing **thresholds of application which would omit every single airline and many public transport operators in the EU.**

We look forward to supporting the further development of the MDMS Regulation and encourage policymakers to push for a positive outcome for all European travelers. This Regulation can be a real leap forward for European mobility, let's make it so!

### Signatories:



**ALLRAIL**  
Alliance of Passenger Rail New Entrants



**BEUC**  
The European Consumer Organisation



**ECTAA**  
European Travel Agents' and  
Tour Operators' Association



**EPF**  
European Passengers' Federation

**eu travel tech**

eu travel tech



**GBTA**

Global Business Travel Association

**MOFAIR**

Bündnis für fairen Wettbewerb  
im Schienenpersonenverkehr

**mofair**

German Alliance for fair competition in passenger  
rail transport