

Background, vision and position on Multimodal Digital Mobility Services

ECTAA represents some 70,000 travel agents and tour operators in Europe, which provide consultancy and sell - besides accommodation, leisure and other tourism services as well as combined products - transport across different modes and suppliers to leisure and business customers. ECTAA represents the whole spectrum of companies, from small brick-and-mortar travel agencies and independent home-based travel advisors to large online travel agencies, global travel management companies and tour operators. As such we also stand for "Multimodal Digital Mobility Services" as it's defined in the Inception Impact Assessment for MDMS:

"MDMS can be defined as "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)"

Travel intermediaries have always been selling trips covering different modes of transport independent from individual transport suppliers. They know the needs and requests from customers and it is their daily business to find the right combination of different transport modes and suppliers. This includes also advising on and selling of more environmentally sustainable travel options. The demand for this is growing.

Beyond the very limited cases where a commercial agreement is in place, an airline would usually not advise a customer about a rail option, even though this could well be a better alternative. Neither would a German railway company recommend trains of a French competitor or to take a bus instead, albeit it a better option. This is what travel intermediaries do. They offer transparency and choice to their customers which is one important reason why many customers choose the indirect distribution channel.

Indirect distribution is key for an uptake of multimodality and THE enabler of any modal shift! There are however many obstacles that travel intermediaries face today and that prevents them from fulfilling their full potential as enabler of transparency, choice and more sustainable travel options. The many challenges span from commercial issues to technical aspects e.g., shorter booking horizons in rail vs. air (3 vs. 12 months). Most of them are however of rather commercial nature and could be tackled with the right regulation in place.

Limitations for transparency is often the result of individually developed software and the unwillingness to use a common application programming interface (API). An open interface should be aimed for with transport suppliers being obliged to open their systems accordingly. Mechanisms have to be put in place to prevent misuse of such open access.

Until this can be achieved, it has to be ensured that no channel will be discriminated. Intermediaries should have access to all content on fair, reasonable and non-discriminatory (FRAND) terms and which should be available in a bookable format. This includes fares, schedules, real-time information on travel disruptions, ancillary services, etc. This is a prerequisite to offer true comparison and transparency to consumers. Especially ancillary services play an increasingly important role as transport service providers unbundle their products and without access to ancillary services in a bookable format a comparison is difficult to impossible.

Especially monopolistic railway companies prevent third parties from accessing data e.g., real-time information about delays etc. which are needed to service customers. If intermediaries want to sell rail, they are usually confronted with commercially unattractive commission payments. A monopolistic railway company has simply no reason to make the sales of their services attractive for indirect distribution. Indirect distribution however is the only place where customers will be provided with the whole picture including smaller competing railway companies or other modes of transport that may be a better option for customers including from an environmental point of view. Intermediaries can offer customers attractive options covering several modes of transport including payment solutions, but are often hindered by transport operators to do so.

Some travel intermediaries combine products and sell them in their own name thus taking risks and determine prices. In many cases travel intermediaries sell only on behalf of operators. In no case however can travel intermediaries be liable for the performance of the transport contract.

Currently, most customers make the decision to get from point A to point B based on their travel needs, but usually without knowledge of all possible options. This can lead to misjudgements both in the duration of the transport, the price or the CO2 emission footprint. Neutral information is needed to make an informed choice.

Very strong market players like airline groups and railway companies withhold content from neutral marketplaces and privilege their own channels. Transport operators want to have more control of the customer and achieve this through more personalization. This is totally understandable from their perspective, but not in line to achieve more multimodality.

When access to content is granted, this is often complicated e.g., by the lack of standards. Real-time data is usually readily available from the operator. They provide it to customers on their apps, so access should not be necessary via National Access Points.

Looking at the future, real door-to-door solutions including all modes (e.g., e-scooters, rental bikes or even upcoming passenger drones etc.) should ideally be achievable. As a first step air transport, rail and buses should be covered as a minimum. Europe in particular, with its dense population and many means of transport, could be a technical pioneer of intermodality and bring forth many disruptive innovations. Combining all transport options could create further development opportunities for new market participants, such as transfer services between previously non-combinable transport options.

However, since these innovations would hardly emerge independently from a market, a binding regulatory framework is needed here in disciplines such as data transfers and interface descriptions.¹ It needs a binding regulatory framework that serves the goal of giving passenger transport the economic, social and ecological status it deserves.

For travel distribution, as for the end customer, the necessary transparency is an opportunity that could lead to the development of new and more environmentally friendly products. Indirect

¹ Historically, the UN had achieved a basis for many innovations in 1986 with EDIFACT , which it protected as ISO standard 9735. This was also a politically desired format that the market would not have found and introduced on its own, but strongly supported and developed in record time. This protocol is now unfortunately already outdated, as it hardly provides any answers to the new complexity of information. But the very rapid implementation at that time and the will to work together can serve as a blueprint for it.

distribution can proactively influence the production of transport through the distribution and thus be an enabler of transport modal shift.

The trend driven by several strong transport operators to prevent or complicate the sales of transport products in indirect channels is to the detriment of consumers and threatens transparency, choice and competition! Customers should always have the right to be helped and be represented by a travel intermediary.

MDMS run by transport operators should be prevented from self-preferencing. If an MDMS is provided by incumbent operators that enjoy a market strong position, then this should be open to other competing operators.

ALL modes and all offers should be able to be compared on a neutral basis or preference of customer (e.g. price, emission, travel time) so all modes and all content must be brought into scope of MDMS – Air must be included!

The neutral display obligation from the CRS Code of Conduct should be extended to all modes with a clear definition of neutrality. The existing limitations concerning access to content, bookable transactions and payment should be addressed. Standardized emission information must be provided to all channels

No transport operator should escape the transparency requirements. Transparency and competition on a level-playing field for the ultimate benefit of consumers should be promoted.