



PASSENGER PACKAGE

ECTAA represents independent travel intermediaries across Europe – travel agents, tour operators, online travel agencies, ticketing platforms and other distributors that **help consumers find, compare, combine, book and service travel across operators and transport modes.**

To make rail and multimodal travel easier to compare and book,
independent travel intermediaries need the right conditions to deliver.

1

MAKE MULTIMODAL RULES TRULY MULTIMODAL



Fair, reasonable and non-discriminatory (FRAND) conditions should apply consistently across transport modes. If a transport operator controls must-have content, independent intermediaries need fair access to it – whether that operator is a railway, an airline or another transport provider.

**Strong market power.
Strong rules. Whatever the mode.**

2

NO TRANSPARENCY WITHOUT FULL CONTENT



- ✓ Fares
- ✓ Inventory
- ✓ Ancillaries
- ✓ Servicing functionalities

Travel intermediaries can only compare what they can access. To give consumers a genuine overview of the market, intermediaries need fair and non-discriminatory access to fares, inventory, ancillary services and servicing functionalities.

**You cannot compare
what you cannot access.**

3

TRANSPARENT RANKING – NOT PRESCRIPTIVE RANKING



ECTAA supports transparency: consumers should understand why offers are ranked and when prominence is paid for in accordance with existing EU consumer protection legislation. But legislation should not prescribe how every independent intermediary's default display must look like. Different ranking and comparison tools allow intermediaries to innovate and help consumers find the best journey for their needs.

**Require transparency.
Preserve choice and innovation.**

4

DO NOT TURN DOMINANT RAIL PLATFORMS INTO SUPER-PLATFORMS



Requiring dominant railway platforms to host competitors' products risks strengthening already powerful incumbent distribution channels and weakening independent, neutral and multimodal alternatives. The better solution is to rely on the proposed content sharing obligation, making rail content available to independent distribution channels on FRAND terms.

**Open the content –
don't strengthen the gatekeeper.**

