

POSITION PAPER

ON EU RAIL PASSENGER RIGHTS

November 2018

EXECUTIVE SUMMARY:

ALLRAIL represents new rail companies, whose success and growth solely depend on keeping their customers happy and hence coming back to rail.

ALLRAIL's objective is to ensure that choosing the train as a transport mode will involve an easy, convenient ticketing & travel experience. This is the only way to attract more and new customers to the most eco-friendly transport mode. Enshrining these as rights in EU legislation provides customers with a guarantee of service quality, thereby boosting rail's competitiveness vis-à-vis the attractive road and aviation alternatives.

We therefore stress that the passenger rights legislation should be updated to better reflect the changing nature and dynamics of the rail sector, particularly in the area of ticketing. The accessibility and availability of rail tickets today is outdated, undermining the quality of the passenger rail experience and frustrating the growth of demand for rail services.

ALLRAIL therefore calls for the following rights to be included the upcoming EU rail passenger rights revision:

1. **The right to integrated, pan-European rail ticketing** - operators are part of an integrated EU-wide rail system, supported by taxpayer funding. Technical interoperability should be mandated so that cross-border, combined journeys across multiple operators are easily possible.
2. **The right of access to ALL available rail options.** This entails mandatory data sharing by operators ('Open Data') and impartial, transparent retail by ALL rail ticket vendors, including those belonging to state rail incumbents.
3. **The right to catch the next available train service in the event of travel disruptions.** If there is a missed connection, regardless whether booking is a 'through-ticket' (one transport contract for the one-way journey) or a 'combined journey' (2+ ticket contracts for the one-way journey)

THE SPECIFICS OF WHAT WE CALL FOR:

1. The right to integrated, pan-European ticketing

- According to the dictionary, a “ticket” is “piece of paper or card that gives the holder a certain right to travel”. These days, in 2017, a ticket can also be digital, e.g. barcode on a mobile device. The ticket is one transport contract, covered from start to end of journey by passenger rights legislation.
- The phrase “Ticketing” is the process of issuing such a travel ticket.

Lack of progress with “through-ticketing”:

- A “through-ticket” is one ticket across multiple (2+) rail operators and consists of only one transport contract. But unfortunately, for many cross-border rail links, through-tickets are not mandated (i.e. voluntary) and, as a result, limited in scope. In reality: state-owned rail incumbents mostly only sell their tickets on their own trains, which do not go beyond a certain point.
- To our regret, there is no commitment to drive through-ticketing until at least 2022. We want through ticketing for connections across all EU rail operators – but we are not willing to wait that long.

Separate ticketing systems should be interoperable:

- The EU railway system is partially supported by taxpayer funding. Thus, it’s understandable that EU stakeholders want a Single European Rail Area (SERA). In our view, **fragmented rail ticketing systems CANNOT be a part of this.**
- **Systems should be interoperable, and technology already provides a solution.** Innovative ticket vendors can already combine separate tickets from separate systems into optimal, one-way bookings that offer cheaper fares and/or faster journeys between any two stations in Europe
- **We call such bookings “combined journeys”.** They represent a single, seamless, cross-border rail booking where the total price and travel times are shown. All in all, the experience for the passenger is just like a through-ticket
- **Combined journeys are made possible by APIs** (Application Programming Interfaces). APIs are the most user-friendly interaction tool between data generators and data users. As data generators, operators should build APIs, and - in turn – as

data users, all licensed ticket vendors should build links to feed from these these. This way, all ticket vendors can show and sell optimal combined journeys.

- **Furthermore, a 'central layer' is necessary in order to achieve proper interoperability.** Operators using the same physical rail station should use identical technical co-ordinates, so that any potential interchange is easily recognizable for ticket vendors and passengers.

Summary:

- A. In a Single European Rail Area, fragmented rail ticket reservation systems are not acceptable; instead, they should also be interoperable**
- B. Technology already provides a solution. Using APIs, ticket vendors can combine separate tickets into optimal, one-way bookings that offer cheapest fares and/or fastest journeys between any two European rail stations**
- C. We call such bookings "combined journeys". Operators should build APIs so that their tickets can be integrated into these bookings.**
- D. For proper interoperability, a 'central layer' is also necessary. Operators serving the same stations should use the same technical co-ordinates.**

2. The right of access to ALL available rail options

If rail is to attract new and more customers, it is vital that accessibility to the cheapest & fastest rail connections is made transparent. Unfortunately, current legislation limits the right of passengers to both see and purchase the most competitive and attractive railway tickets.

- New entrant rail operators do not have permission to sell their tickets at incumbent in-house ticket vendors.
- Independent ticket vendors are not always able to offer customers a complete overview of rail options

We need (1) Open Data and (2) Impartial Retail

The example below shows the benefits of both. It shows the rail options on offer between Lille and Bonn over a five hour period between 11am- 4pm on 20th March 2020, both at an independent ticket vendor and an incumbent in-house ticket vendor.

Independent Ticket Vendor				Incumbent in-house ticket vendor							
Your Bonn → Lille trip EDIT SEARCH											
Monday 20 March		2 nd class	1 st class	Fri 17		Sat 18	Sun 19	Mon 20	Tue 21	Wed 22	Thu 23
				SELECT YOUR OUTBOUND		Non exchangeable		Exchangeable conditions apply		Flexible	
11:01 → 15:48 4h47	DB	€59.00	€107.90	11h46 15h48		BONN HBF LILLE EUROPE 2 changes 4h02		-	103,00 €	-	-
11:46 → 19:50 8h04	DB THALYS	€74.50	€63.00	15h46 19h52		BONN HBF LILLE EUROPE 2 changes 4h06		-	103,00 €	-	-
15:01 → 19:51 4h50	DB B	€49.50	€132.50					-	5 SEATS at this price *	-	-
15:46 → 19:52 4h06	DB THALYS	€95.50	€148.00					-	9 SEATS at this price *	-	-

- The independent ticket vendor (on the left) has access to all the timetable and fares data, and it is an impartial retailer. It combines separate tickets into optimal one-way bookings that provide cheapest fares and/or fastest journeys between any two railway stations in Europe
 - Twice as many departures are shown (compared to the incumbent in-house ticket vendor!)
- The cheapest price at the independent ticket vendor is 52% cheaper than the incumbent in-house ticket vendor – using EXISTING trains! After all, ticket vendors do not operate any of their own train services
- If all ticket vendors were impartial, they would all show and sell the best rail options to customer.

However, in many parts of Europe, there are barriers in place that limit customers in choosing and purchasing the optimal rail journey. Unfortunately, there is often not Open Data or Impartial Retail because neither are mandated!

Incumbent in-house ticket vendors only show and sell incumbent trains.

In the above example, we can see how the incumbent ticket vendor shows fewer options and higher prices. This is paradoxical. Why?

- incumbents are state-owned entities, funded by the taxpayer. Citizens often grew up with such brands and trust them as being neutral entities where they receive all information. ***But, in reality, the opposite is the case!***

Passengers should have the confidence that, wherever he or she goes both to see and purchase rail tickets, the data shown is the same.

Right now, Europe's rail industry is **failing to crack open and enable cross-border ticketing** - it is a spectacular 'own goal'!

ALLRAIL believes the passenger should have impartial access to ALL rail options at ALL ticket vendors

- **Competing rail offers on same route**
- **Cheapest / fastest possible rail journey options between any two EU rail stations** by means of changing trains at any reasonable point along the route, as provided for by the official railway planners (e.g. MERITS, Hafas).
- **Other data relevant to the journey** (e.g. live departure/arrival information)

Summary:

A. **Passengers should have the right to be confident that, wherever he or she goes both to see and purchase rail tickets, the four core types of data shown are the same:**

- Timetable data, including fastest journeys
- All types of fares, including the lowest fares
- Real-time information on delays
- Seat mapping (i.e. order of rolling stock & seat layout *if* available AND also shared with market dominant operators' in-house sales channels)

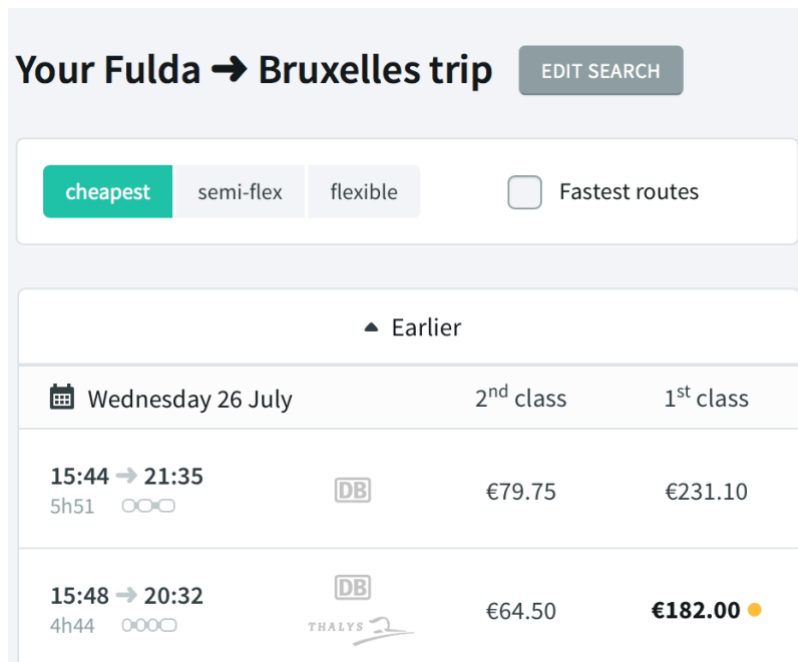
B. **Data should be made available in a non-discriminatory manner to all ticket vendors**, with commercial terms, remuneration and marketing permissions being the same (= level playing field)

C. **Customers must be guaranteed the right to purchase all available rail options** at all ticket vendors. Displaying timetables and fares alone is not enough – tickets have to be purchasable as well!

3 The Right to catch the next available train service in the event of travel disruptions, i.e. if there is a missed connection, regardless whether booking is a through-ticket or a combined journey

If rail is to offer an attractive alternative to the ease and comfort of travelling by car, passengers should not be penalised in the event of disruptions. Maximum efforts should be made to get passengers to their final destination in the shortest time possible.

We know that “combined journeys” can open up a wide range of new rail options, using existing trains – by combining **separate tickets into optimal, one-way bookings**



Your Fulda → Bruxelles trip EDIT SEARCH

cheapest semi-flex flexible Fastest routes

▲ Earlier

Calendar icon	Wednesday 26 July		2 nd class	1 st class
	15:44 → 21:35 5h51 ○○○	DB	€79.75	€231.10
	15:48 → 20:32 4h44 ○○○	DB THALYS	€64.50	€182.00 ●

In the above example, you can see how an impartial ticket vendor showed rail travel options from Fulda in Germany to Brussels in Belgium for departures between 15:30 and 16:00 on 26th July 2019. The 1st line is a through-ticket and 2nd a combined journey across two operators.

The combined journey is both cheaper and faster than the through-ticket with one operator.

Combined journeys offer more options, but they are put together by combining separate tickets, with separate transport contracts

That means: if the train being used for the first part of the journey is delayed, and the passenger misses their connecting train provided by another operator using a different

ticket, the passenger is not protected and might be forced to buy a new ticket for a later train, with an on-the-day fare, leaving them out of pocket.

Rail is the only transport mode where such a disjointed system remains in place and this needs to change. In our view, a simple, customer-orientated solution is necessary.

Therefore, in the upcoming EU passenger rights review, we call for a level playing field – **the same missed connection protection for combined journeys as for through-tickets.**

That means: in the case of a missed connection, this will allow passengers to continue on the following train without any extra cost.

The risk is great: If the EU does not act, 'through ticketing' will present a guise for incumbents to make agreements with each other, shutting out new entrant operators from one-way journeys with passenger rights coverage. If the passenger wants protection from start until end of the journey, the ONLY option will be to book through a rail incumbent: such a scenario is anti-competitive

Summary:

With combined journeys - just like with a through-ticket - the customer's **main priority when making the booking is that they will reach their final destination.**

- A. Therefore, we call on EU stakeholders to introduce missed connection protection across combined journeys**
- B. In the event of a missed connection, passengers would be allowed to continue on the following train to his or her final destination without any extra cost**

For more details please contact:

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