



# ALLRAIL

The Future of Passenger Rail

## POSITION PAPER

### ***The Great Rail Ticket Unbundling:***

***Unpick The TRIPLE Lock-In***

***to***

***Enable More Choice for Passengers***

### **Part I**

18<sup>th</sup> February 2026

## Contents

<b>Executive Summary: The 3 Key Messages .....</b>	<b>3</b>
<b>The Problem.....</b>	<b>6</b>
EU Rail Ticketing Has Not Evolved with the Times .....	6
The Passenger Reality.....	6
Further Recent Data Confirms the Scale of the Problem.....	7
<b>First Solution: Unbundle National Rail Ticket Vendors with Significant Market Power (SMP) from Rail Operators with SMP .....</b>	<b>8</b>
Ticket Vendors Are Part of the Rail Infrastructure .....	8
Case study 1: Denial of Visibility for New Entrant Operators at Rail Stations – Causing a Non-Replicable Marketing Advantage .....	9
Case study 2: Group Brand Unfairly Used to Promote In-house Rail Operators and Ticket Vendors .....	10
Why Commercially Driven (i.e. Open Access) Operators Need Impartial, Multichannel Ticket Sales.....	11
The Silent Killer of Open Access – And Cost Driver for Taxpayers.....	11
<b>Second Solution: Unbundle The Data from the Ticket Distribution .....</b>	<b>12</b>
<b>Calls For Action.....</b>	<b>13</b>

## Executive Summary: The 3 Key Messages

*In the lead up to the publication of the EC's Single EU Rail Ticketing Proposal, ALLRAIL is sharing its view of the current challenges facing the rail and ticket sector in Europe, and some of the things we believe the EU can do to render the rail sector more competitive. We hope to see these elements reflected in the upcoming initiative.*

- Rail ticketing distribution remains one of the most serious structural weaknesses in Europe's passenger rail system. Despite digital progress, **searching and booking** domestic, cross-border or multi-operator rail journeys remains fragmented, opaque and, in many cases, simply not possible.

Across Europe, innovative **new rail operators and independent ticket vendors are ready to transform passenger travel**. Yet their growth is constrained by the structural advantages and protections still enjoyed by state-owned operators.

- We urge the EU Commission to take stronger action to complete a genuine Single European Rail Area, one that rewards competition and innovation for the benefit of passengers and the wider European economy.

State-owned incumbents with Significant Market Power (SMP) in their national markets are the key structural cause of the EU's dysfunctional rail ticketing market, both in their role as passenger rail operators and through their vertically integrated, in-house ticket vendors. These state-owned ticket vendors capture the overwhelming majority of ticket sales in their respective national markets **as well as** when they collude across internal EU borders, making it a Europe-wide problem.

### **In effect, there is a TRIPLE Lock-in:**

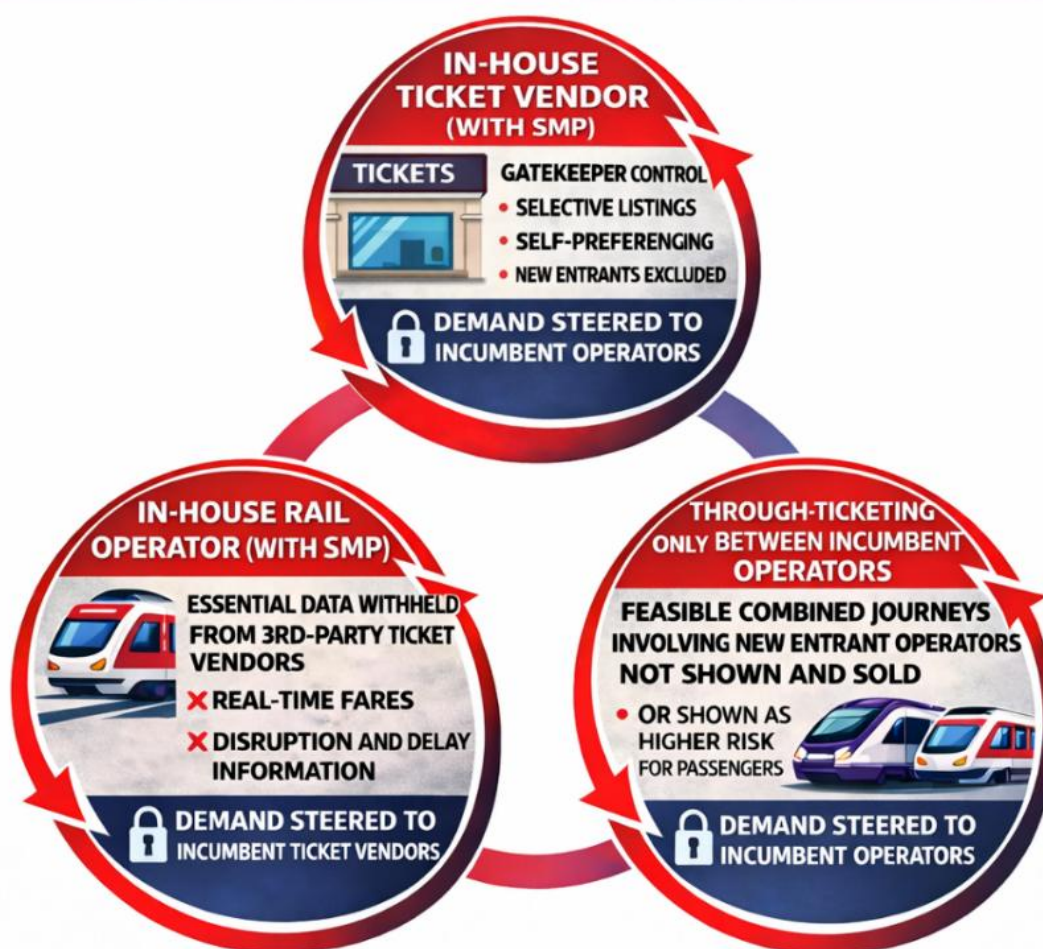
1. Within such vertically integrated groups, the **in-house rail ticket vendor with Significant Market Power<sup>1</sup> (SMP)** exploits its gatekeeper position at the point of sale. It frequently refuses to display or sell the services of willing new-entrant operators, including Open Access services, while systematically favouring its own rail offers. In practice, these ticket vendors function as digital gatekeepers, steering passenger demand towards in-house operators with SMP and preventing passengers from discovering alternative, better-value or more frequent rail options.

---

<sup>1</sup> **Significant market power** should be defined in a comprehensive manner, covering vertically integrated operators holding more **than 50% of the relevant market, as well as situations where market shares below 50% nonetheless confer a substantial and non-replicable competitive advantage**. Such advantages may arise from structural or strategic assets, including but **to control over essential facilities or management of marketing at rail stations**.

2. At the same time, **incumbent rail operators with SMP routinely withhold essential data from third-party ticket vendors**. This includes, in particular, real-time fares and availability as well as disruption and delay information. Without continuous, non-discriminatory access to this data, third-party ticket vendors cannot compete effectively, as dominant rail operators reserve the most complete and reliable data for their own in-house ticket vendors.
3. Last but not least, **passengers are effectively locked in by the practice of rail operators with Significant Market Power limiting through-ticketing agreements to themselves and a closed circle of partners**. As a result, many feasible multi-operator journeys ('combined journeys') are either not shown at all, or they are presented as carrying a higher risk for passengers, even when booked in a single transaction. In effect, the cross-border rail 'network' is limited to only those journeys where there is a change of trains between state incumbents and if a legacy through-ticket exists.

## THE TRIPLE LOCK-IN OF EU RAIL TICKETING



**To fix this, we call for a *Great Rail Ticket Unbundling*; with 3 bold solutions:**

1. **UNBUNDLE the national rail ticket vendors with Significant Market Power (SMP) from the national rail operators with SMP:**

As state-owned companies, they should give passengers full transparency over all rail options, displaying and selling all willing rail operators' tickets on **fair, reasonable and non-discriminatory (FRAND)** terms.

- They must not exclude showing and selling operators that compete against rail services provided by operators with SMP (which are most often part of the same company or group).

2. **UNBUNDLE the data and ticket sales layer to all willing third-party vendors:**

third-party ticket vendors need equal access to real-time fares, schedules, and availability data to ensure passengers can compare and book transparently.

- Data sharing and distribution agreements must take place on FRAND terms, enforced by strong national regulators.

3. **UNBUNDLE passenger protection from legacy through-tickets:**

All viable one-way combined journeys involving operators with SMP and other willing operators **must be searchable and bookable on both market-dominant and willing ticket vendors, with passenger rights protection covering the entire journey from origin to destination.**

## The Problem

### EU Passenger Rail Ticketing Has Not Evolved with the Times

Twenty or thirty years ago in the current EU, it made perfect sense that the rail operator and ticket vendor were one and the same. There was usually only a single, state-owned railway company operating the national network. Selling tickets only through its own counters, call centres or websites was normal, because there were no alternative operators, and therefore no competing operators or ticket vendors to exclude.

**But that world no longer exists.** Today, Europe has entered a much better and bolder era: the internet has revolutionised retail, there is more cross-border rail infrastructure, and there are new-entrant operators on the tracks. Yet the sales structure of rail **has barely changed**. In most EU Member States, the incumbent dominates both the operation of trains and the sale of tickets.

### The Passenger Reality

Travelling across the EU by train remains unnecessarily difficult which means that rail is falling far short of its full potential in terms of mode share. Passengers often cannot see all available options – domestic and cross-border – cannot book multi-operator journeys, and are uncertain about their rights in the event of a missed connection.

According to a recent (October 2025) **YouGov survey** <sup>2</sup> for the NGO 'Transport & Environment' (T&E)<sup>3</sup>:

- **42 %** of passengers want booking ticket vendors to show *every* available train, including competing operators, and not just those of the incumbent
- **46 %** want to book all trains on a single platform
- **61 %** of long-distance rail journeys within the EU were avoided simply because passengers found it too difficult to purchase tickets covering multiple operators.

How often do you avoid using trains for long-distance because of booking difficulties? (T&E / YouGov, 2025)

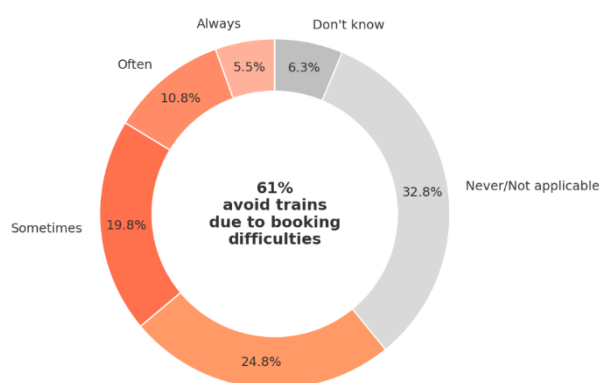


Figure 1 – 61 % of passengers avoided long-distance trains due to booking difficulties Source: own preparation based on Transport & Environment – YouGov (2025)

<sup>2</sup> <https://www.transportenvironment.org/uploads/files/Heres-what-European-travellers-think-of-rail-booking-processes-1.pdf>

<sup>3</sup> <https://www.transportenvironment.org/>



The results of the Transport & Environment's YouGov survey are the clearest **possible mandate** for transparent, interoperable, and open rail ticketing. In an era when people can compare and book flights or hotels within seconds, buying a train ticket, particularly for journeys involving more than one operator or crossing a border, is still **needlessly** complicated.

## Further Recent Data Confirms the Scale of the Problem

In addition, the 2025 **Eurobarometer study on Multimodal Digital Mobility Services (MDMS)** found that a lack of interoperable ticketing and the weak enforcement of passenger rights accounts for roughly **40 % of the factors discouraging travellers** from choosing rail for regional or long-distance journeys<sup>4</sup>.

Moreover, ticketing, journey-planning and passenger-protection barriers were cited very frequently as the main reasons for not combining operators in a one-way journey, even if this would be cheaper, faster or the only way to do it.

- **23% could not find a suitable combination, 18% feared being stranded with separate tickets, 11% did not know where to search, 10% did not know it was possible and 9% could not buy all tickets in one place (Figure 2).**
- **These findings are a wake-up call. Despite years of technological progress and digitalisation, Europe's rail ticketing market remains trapped in the past – and concrete solutions are needed.**

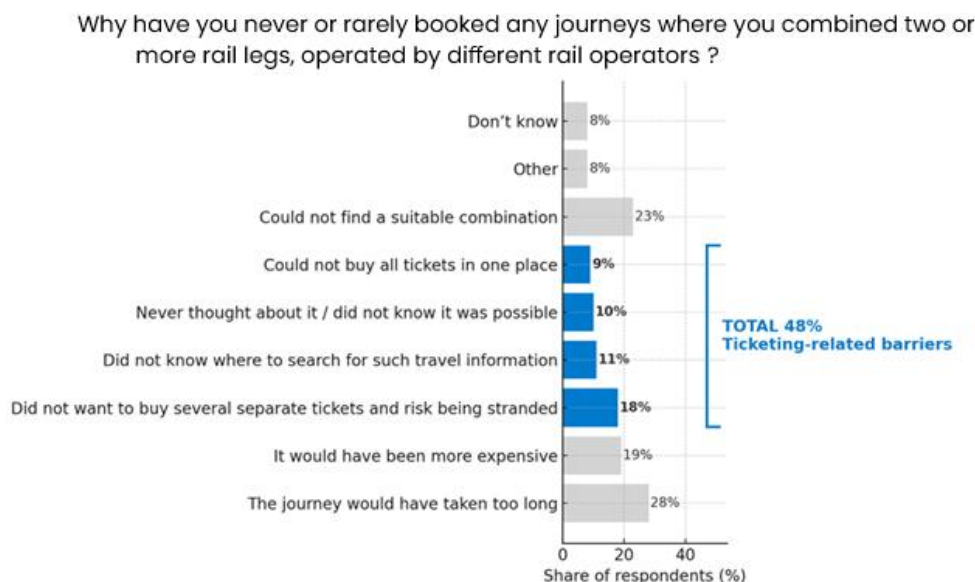


Figure 2 – Source: own preparation based on Eurostat (2025). Multiple answers.

<sup>4</sup> European Commission. (2025). Eurobarometer No. 3178. European Union. Available [here](#).

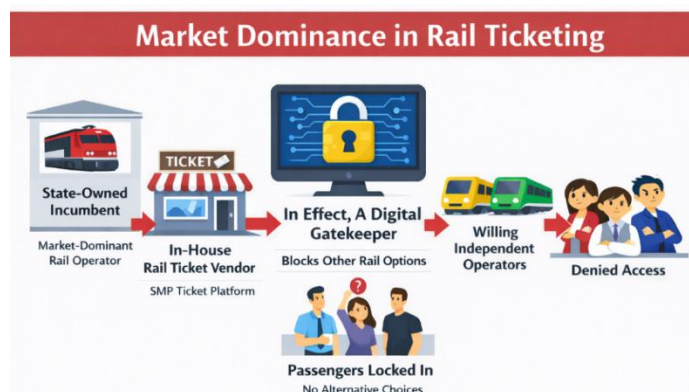
## First Solution

# Unbundle National Rail Ticket Vendors with Significant Market Power (SMP) from Rail Operators with SMP

Ticketing is the first and most visible contact point between the passenger and the railway system. It is where market liberalisation becomes real for citizens. Even with non-discriminatory access to railway infrastructure, passengers still encounter a marketplace that is dominated by national vertically integrated monopoly rail operators and their in-house ticket vendors.

## Ticket Vendors Are Part of the Rail Infrastructure

The vast majority of rail ticket vendors with SMP in EU Member States are currently vertically integrated with the national railway operators also with SMP, giving the latter's services a clearly dominant position in the downstream rail ticket distribution market.



This high combined market share is **not the result** of genuine competition on the merits, but rather the legacy of a previous era when they were the only market players.

- This historic inherited monopoly has also created powerful network effects: state-owned incumbents dominate both PSO-funded regional services and long-distance commercial routes, making their vertically integrated rail ticket vendor the first and only point of reference for the wider public when buying tickets – whether online, at a station counter or ticket machines.

The market-dominance of the in-house rail ticket vendor and operator is **reinforced by ubiquitous branding and visibility**. In the case of stations managed by the state-owned rail incumbent operator or the vertically integrated in-house infrastructure manager, the first thing passengers see in a station is the logo and marketing of the operator, which by association directs them to the same operator's in-house ticketing app or website.

- **The entire journey, from signage to purchase, is designed to funnel passengers back to the incumbent's own ecosystem** – see the two case studies below.



- **It is a structural failure that harms competition, limits passenger choice, results in rail not tapping into its full potential demand and revenue, and undermines innovation and private investment.**

## Case study 1: Denial of Visibility for New Entrant Operators at Rail Stations, Causing Non-Replicable Marketing Advantage

In Poland, stations are managed by the state-owned holding company PKP S.A., which sits at the centre of the PKP Group. Meanwhile, long-distance passenger services are operated by PKP Intercity S.A., a vertically integrated subsidiary of the same holding firm.

Just last week, on February 12<sup>th</sup> 2026, it was reported that PKP Intercity's **CEO**

**Janusz Malinowski** wrote a letter in January 2026 calling for an **"absolute ban"** on competing operators being advertised inside PKP railway stations, as a response to adverts for a new entrant – RegioJet – gradually appearing at stations in Poland<sup>5</sup>.

In the letter, it was reported that **Mr Malinowski** claims how his operator has a **substantial non-replicable marketing advantage**, which must be defended:

*"Allowing direct competitors of PKP Intercity S.A. to conduct promotional activities on media belonging to PKP S.A. acts to the detriment of the interests of the PKP Group. (...) **the ban should apply to stations of strategic importance for the operational and commercial activity of PKP Intercity S.A., where the display of advertisements of a competing operator directly affects passengers' purchasing decisions.**"*<sup>5</sup>

These words confirm that PKP Intercity (PKP IC) benefits from a structural advantage: brand visibility at stations, where the most rail-friendly customers can be found. In turn, this reinforces the visibility, as part of the PKP brand, **of PKP IC's vertically-integrated ticket vendor**, an advantage that is not replicable by any competing new-entrant operator.

**In addition, so far, we see no evidence that any of the ticket counters at Polish stations will be made available to RegioJet.** Altogether, such behaviour raises serious concerns under EU railway law and competition law, including the principles of non-discrimination and infrastructure manager independence laid down in Directive 2012/34/EU.



Warsaw Central Station: [Chris Olszewski](#) CC BY-SA 4.0

<sup>5</sup> TVN24. (n.d.). Spór o reklamy RegioJet na dworcach. PKP Intercity apeluje o zakaz, Ministerstwo Infrastruktury odpowiada [**Dispute over RegioJet advertisements at railway stations; PKP Intercity CEO Janusz Malinowski calls for a ban**, Polish Ministry of Infrastructure responds]. TVN24. Available [here](#).

## Case study 2: Group Brand Unfairly Used to Promote In-house Rail Operators and Ticket Vendors

Less than half a year ago in Germany, on 6 October 2025, a highly relevant article was published in the *Background Verkehr & Smart Mobility* magazine of the mainstream newspaper *Tagesspiegel*.

The article reported that the German rail regulator (Bundesnetzagentur) is examining a complaint concerning the blurring of infrastructure and competitive divisions within the vertically integrated, state-owned Deutsche Bahn (DB) group.

The article notes how *“the state-owned company is increasingly merging communications and advertising for its publicly subsidised infrastructure monopoly with those for its profit-oriented commercial divisions.”*

- In practice, the same highly recognisable red **“DB” group brand** is used simultaneously for:
  - **DB InfraGO**, the taxpayer-funded rail infrastructure and station manager, and DB’s **commercial rail undertakings**, including passenger operators **DB Fernverkehr** and **DB Regio**, as well as DB’s **in-house ticketing channels**, notably the DB Navigator app, the bahn.de website, and DB-branded ticket counters and machines at stations.

This structure raises serious concerns regarding **brand neutrality, market transparency, and fair competition**, as communications relating to publicly financed infrastructure works may **indirectly promote DB’s own commercial subsidiaries** operating in competitive passenger and freight markets. This joint branding and communications strategy reinforces the public perception that **DB is effectively ‘The’ railway in Germany**.

DB is, in practice, even commonly referred to in German as **“Bahn”**<sup>6</sup> which when translated directly literally means **“Railway”**, even though many other operators & ticket vendors exist in the country as well.

Consequently, the effect extends into ticketing markets: DB’s in-house online rail ticket vendors (DB Navigator and bahn.de), which allegedly have **“95% of rail ticket sales”**<sup>7</sup> **in Germany**, benefit from the **inherited visibility and familiarity** associated with state-funded infrastructure communications – to the detriment of new-entrant operators and third-party ticket vendors.

<sup>6</sup> <https://www.fr.de/wirtschaft/bahn-sperrung-trifft-deutsche-wirtschaft-hart-experte-warnt-vor-weitreichenden-folgen-94159722.html>

<sup>7</sup> <https://jonworth.eu/how-to-fix-railway-ticketing-in-the-eu/>

## Why Commercially Driven (i.e. Open Access) Operators Need Impartial, Multichannel Ticket Sales

We are led to believe that passengers are comparing ‘all’ ticket options, when in reality they see only a curated subset of the market. If a new-entrant operator is then not shown on each EU Member State’s national rail ticket vendor with Significant Market Power (SMP), such as SNCF Connect in France, then it is commercially invisible:

### ***“Passengers Don’t Know What They Don’t Know”***

How can anyone claim that passengers are satisfied with EU ticketing, when they are not being informed about all of the existing rail options?

- **There are now numerous examples** of how new-entrant long-distance Open Access rail operators all across the EU who ceased operations over the course of the past decade – SAGA Rail in Sweden, as well as Hamburg-Köln-Express (HKX), InterConnex & Locomore that were all in Germany – primarily because they were not shown and sold on the national rail ticket vendors with SMP. Some even named this **as the explicit cause**<sup>8</sup>. How can this be good for passengers?
- Example: just a few weeks before **Locomore’s bankruptcy**, its CEO Derek Ladewig specifically stated that the **lack of exposure at the dominant incumbent in-house ticket sales channels**, where the vast majority of the public go to buy their tickets, was the biggest single barrier to entry.<sup>9</sup>

## Silent Killer of Open Access – & Cost Driver for Taxpayers

- **Without the necessary exposure, Open Access operators cannot reach sufficient passenger volumes** to achieve the economies of scale required to cover their fixed costs.
- In turn, **they cannot build brand recognition** or passenger trust;
- And **without sales volume**, they cannot reinvest in better rolling stock, technology, or new routes.

Then, once privately-owned Open Access operators disappear, there is the risk that the same services are repackaged by public authorities as needing a “PSO” (i.e. taxpayer-funded Public Service Obligation) contract.

**In other words, a closed distribution market leads to the structural dependence on higher taxpayer subsidy. It is much cheaper for EU Member State governments to open the market-dominant sales channels than to fund PSO long-distance services.**

<sup>8</sup> International Rail Journal, “Saga Rail suspends operations amid SJ online sales dispute”, 21st June 2018

<sup>9</sup> <https://www.allianz-pro-schiene.de/themen/aktuell/interview-derek-ladewig-locomore/>

## Second Solution

### Unbundle The Data from the Ticket Distribution

Once national rail ticket vendors with SMP are unbundled and opened to all operators, the next step is to ensure equal access to data from national operators with SMP to third-party rail ticket vendors. Independent distributors are essential for competition and innovation in the downstream rail ticket vendor market.

- **Competition between all types of ticket vendors should not be in terms of who has better access to data, but instead who refines that data most effectively in order to put it to the best of use of passengers.**
- In October 2025, the European Commission, as part of the discussion on ticketing standards, highlighted that **state-owned rail operators maintain substantial control over ticket distribution.**
- Moreover, in its decision concerning the rail operator Renfe<sup>10</sup>, the Directorate-General for Competition underlined that Renfe, as a state-owned and vertically integrated incumbent, holds a dominant position in the downstream Spanish online rail ticketing market via its own distribution solutions, **illustrating how control over ticketing can reinforce market power beyond rail operations.**
- In all EU Member States, rail products are predominantly distributed through **the railway undertaking's own ticket vendors or that of their preferred distributors, notably railway undertakings in alliance or other forms of close cooperation.**
- Considering that the rail sector in the EU receives **over €100 billion in public subsidies each year**, EU citizens have a **legitimate expectation** that all rail ticket vendors – whether state-owned or third-party – will provide **complete and consistent information.**

### Examples of Good Practice Across the EU

In **France**, Article 28 of the *Loi d'Orientation des Mobilités* (LOM, 2019) requires transport operators to share data and cooperate with privately owned third-party ticket vendors, but focused only on local and regional services.

- In fact, in a recent report of the French National Senate<sup>11</sup>, there is a call to include commercially driven long-distance Open Access services (not only regional services and subsidised services) in the scope of this obligation.

<sup>10</sup> European Commission. (2024, January 17). Summary of Commission Decision (Case AT.40735 – Online rail ticket distribution in Spain) (C/2024/2269) [Official Journal of the European Union]. Available [here](#).

<sup>11</sup> Assemblée nationale. (2025). Rapport d'information n° 1897 : Le rôle du transport ferroviaire dans le désenclavement des territoires (B. Cernon & O. Givernet, Rapporteurs). [https://www.assemblee-nationale.fr/dyn/17/rapports/cion-dvp/117b1897\\_rapport-information.pdf](https://www.assemblee-nationale.fr/dyn/17/rapports/cion-dvp/117b1897_rapport-information.pdf)

- Moreover, the French Transport Authority has required public authorities and operators with digital sales systems to publish **standard access contracts** on **fair, reasonable and non-discriminatory** terms<sup>12</sup>.

Meanwhile in **Finland**, Chapter 2 (Sections 2–6) of the Act on Transport Services (*Laki liikenteen palveluista 320/2017*, as amended) establishes obligations:

- All dominant rail operators must provide all authorised mobility-service providers (both publicly and privately owned) with access to essential timetable, route and fare data, as well as to their digital sales and ticketing interfaces, under fair, reasonable and non-discriminatory conditions. Compliance is supervised by the Regulator “TRAFICOM”.

## Calls For Action

### The Great Rail Ticket Unbundling:

#### Unpick the TRIPLE Lock-In; Enable More Choice for Passengers

Europe’s rail market cannot function competitively if passengers cannot see, compare, and safely combine services across operators. Ticket distribution remains one of **the single most powerful bottlenecks** in passenger rail, limiting rail’s full potential in achieving a higher mode share.

The **Single Digital Booking and Ticketing Regulation (SDBTR)** must therefore deliver targeted, rail-specific reform where market power exists. In summary, we believe that the SDBTR must achieve the following:

#### 1. **UNBUNDLE** the Market-Dominant Ticket Vendors from Market-Dominant Operators – They Should Sell All Willing Operators’ Tickets

##### Unbundling power unlocks choice for passengers:

- Rail ticket vendors with **Significant Market Power (SMP)** must be unbundled from the vertically-integrated dominant rail operators.
- Such ticket vendors with SMP must **display and sell tickets for all willing rail operators** on **fair, reasonable and non-discriminatory (FRAND)** terms, without preferencing.

---

<sup>12</sup> For instance, in its landmark Decision n° 2025-066 (RATP Smart Systems v. Île-de-France Mobilités), ART ordered the regional authority to share technical documentation for new fare products and suspended advertising of its own app until competitors received equal access—establishing clear principles of transparency and competitive neutrality.



## 2. **UNBUNDLE** The Data from the Ticket Distribution

### Transparency starts with open data:

- National passenger rail operators with SMP must share all essential data – timetables, real-time fares, availability, and disruption information – with **all willing third-party rail ticket vendors** under FRAND conditions.
- Willing third-party ticket vendors must be able to conclude sales and distribution agreements with national market-dominant rail operators on transparent, predictable terms.

## 3. **UNBUNDLE** Passenger Protection from Legacy Through-Tickets

### Improved passenger rights – protect the combined journey, not just the formal, legacy through-ticket:

- All viable rail connections involving all market-dominant operators must be searchable and bookable on **market-dominant and willing ticket vendors**, provided an agreed reasonable **Minimum Connection Time (MCT)** is adhered to.
- **All willing new-entrant operators** must also be able to participate on FRAND terms.  
*More to come on this in **Part II** of this Position Paper next week.*



### About us

The Alliance of Passenger Rail New Entrants (ALLRAIL) is the global non-profit association of independent passenger rail companies. Headquartered in Brussels, Belgium, ALLRAIL has held the status of an official representative body for the rail sector since 2019. We represent new entrant passenger rail operators, based out of countries in Europe and around the world.