#FairRailTicketing

9 Myths About the New EU Passenger Package

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The Future of Passenger Rail

1 **Myth:** Passengers can find already all available rail options

Reality: You cannot book what you cannot see

Passengers can now choose between different rail services, but too often they cannot find them.

The EU Passenger Package fixes this: passengers should be able to compare, book and combine all rail operators on market-dominant digital platforms.

2

Myth: Fair access to dominant ticket vendors undermines the principles of business freedom

Reality: The proposal addresses a genuine digital market failure

National state-owned incumbents still dominate both rail operations and ticket distribution in many Member States. In some markets, they control over 90% of rail operations and ticket sales. Their in-house digital platforms can self-preference their own services. Dominant rail gatekeepers should not control visibility, distort passenger choice or decide which competitors can be found.

3

Myth: Fair Access to rail dominant vertically integrated ticket vendors is not indispensable

Reality: A access becomes essential to ensure visibility, passenger choice and effective competition.

To get as much exposure as possible for the rail sector, passengers need multichannel sales. Each type of digital rail platform should receive equal access to data of dominant operators. All digital rail platforms will then compete with each other on who refines this data for the most optimal benefit of the passenger, rather than which one has better access to it.

4

Myth: The current rail ticketing market is already fit for passengers and operators

Reality: Independent operators and passengers are not satisfied with the statuo quo

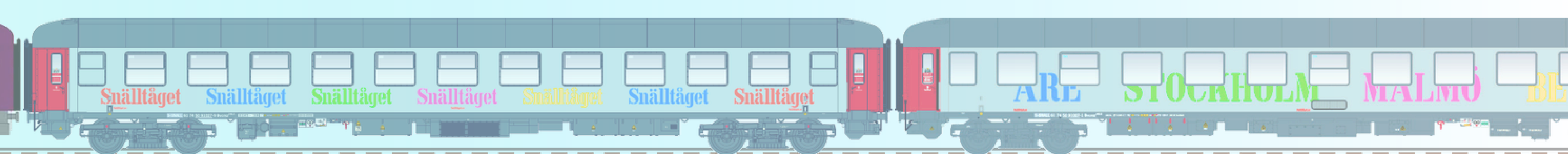
Greater visibility for new rail entrants and greater transparency for passengers are urgently needed. The NGO Transport & Environment reports that 61% of long-distance rail travellers have avoided journeys because booking is too difficult, while over 40% would travel more by rail if booking were easier. Better visibility would mean more passengers, stronger rail competitiveness and a more attractive rail offer overall.

5

Myth: FRAND terms will distort the market

Reality: FRAND terms prevent abusive fees in both directions

FRAND terms are basic guardrails. They should prevent dominant rail operators from paying artificially low fees to independent digital rail platforms, while also preventing dominant digital rail platforms from charging excessive fees to independent operators seeking visibility. It is crucial to ensure both are comparable.



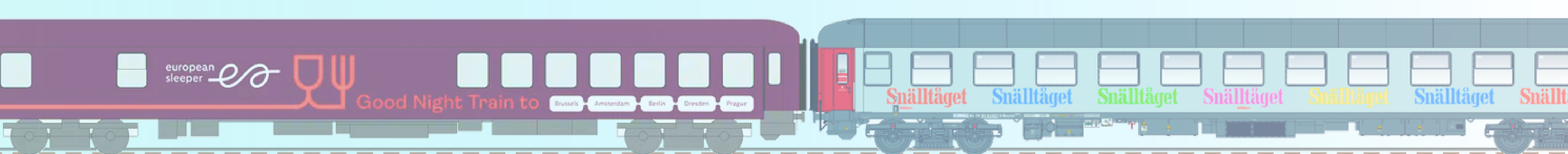
6

Myth: Opening the rail ticketing market will create substantial costs for the industry

Reality: The cost argument is a false flag

Market-dominant state-owned rail incumbents have already shown and sold each other operators' services, and offered through tickets with each other, for many years without dramatic cost warnings.

With rail ticketing standards now established, claims that extending the same arrangements to independent operators and independent platforms would suddenly create prohibitive costs or push up fares are not credible.

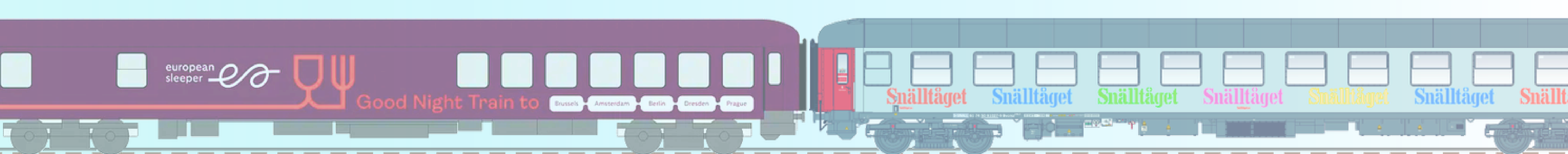


7 **Myth**:Unequal visibility does not impact the viability of Open Access services

Reality: Independent Operators needs visibility to scale

Commercial Open Access services only work if passengers can find and book them. Without exposure on dominant state-owned platforms, new operators lose scale or must build costly sales infrastructure from scratch.

As the European Commission (DG COMP) has recognised, dominant state-owned operators benefit from economies of scale and brand name that, as a result of its former legal monopoly, other rail operators cannot match.



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Myth: Rail should be treated like aviation

Reality: Rail ticketing required a targeted Regualtion

The aviation sector is not comparable to the current rail market. It is a far more mature and competitive market than rail, both in terms of passenger services and ticket distribution.

Rail still suffers from national silos, dominant incumbent platforms, weak visibility for competitors and unfair branding practices at railway stations, where state-owned companies managing the stations often share branding, visual identity or customer-facing spaces with the incumbent rail operator.

9

Myth: This is EU overreach

Reality: A fair and harmonised EU Regulatory Framework was needed

EU action on rail ticketing is not overreachm it is overdue. Today's fragmented national ticketing systems leave passengers confused and smaller operators invisible.

The Rail Ticketing Regulation can help create a genuine European rail market, where passengers can see, compare and book the services available to them. This is targeted EU action to deliver better connectivity, stronger social mobility and real passenger choice.

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