



# REMAINING CHALLENGES FOR EU-WIDE INTEGRATED TICKETING AND PAYMENT SYSTEMS

*Annex V*

GRIMALDI | STUDIO  
LEGALE

  
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ECONOMICS & POLICY

WAVESTONE

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# **REMAINING CHALLENGES FOR EU-WIDE INTEGRATED TICKETING AND PAYMENT SYSTEMS**

## ***Annex V***

***Europe Direct is a service to help you find answers  
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## Interviews guidelines

**Table 1 Interview guide for project coordinators**

### Preliminary questions for project coordinators

1. To what extent it became easier for passengers to travel using multimodal transport? Is there data showing if:
    - The number of passengers has increased in urban transport systems;
    - The number of passengers has increased in cross border integrated ticketing systems;
    - Are there studies or projects that may include such information?
  2. To what extent did the project improve fare data access?
  3. What factors have influenced the achievements observed?
  4. How affordable were the costs borne by different stakeholder groups, given the benefits they have received?
  5. How relevant is the intervention of passengers?
  6. How likely are the effects/results of the project to last after the project ends?
  7. To what extent the project will continue to require EU intervention?
  8. What elements can your project teach us are the lessons of your project that can be useful for this study
- Barriers and how to overcome them
    - Legal
    - Commercial
    - Etc.
  - Solutions
    - Legal
    - Commercial
    - Etc.
    - other

**Table 2 Targeted interview guidelines**

### Targeted interview guidelines

#### Introduction

This interview forms part of an independent, external study to support the Commission in the assessment of the challenges to delivering integrated ticketing and payment systems. The study, "Remaining challenges for EU-wide integrated ticketing and payment systems" (hereinafter, the "study"), was launched by the European Commission in 2017 and is being undertaken by Grimaldi Studio Legale and its partners.

The general objective of this study is to investigate and provide a comprehensive and neutral analysis on the challenges of delivering EU-wide integrated ticketing and on possible actions and initiatives to address them.

This interview is aimed at complementing the data collection exercise carried out by the study research team with two written surveys that have been launched among stakeholders. Through this interview the research team aims to gain more in-depth insight of the barriers that hinder integrated ticketing as well as viewpoints on pros and cons of possible policy measures to promote integrated ticketing.

#### Target audience

The interview programme is targeting experts within national authorities, agencies, companies active in the transport sector, their associations, ticket vendors, travel agents, and other organizations who are familiar with issues related to the transport of passengers.

The information provided by each respondent will be treated as reflecting his/her personal understanding of the relevant legislation of his/her Member State as well as of the legal and financial challenges to delivering integrated ticketing and not as the official position of his/her organization unless otherwise specified.

#### Data requests and confidentiality

Stakeholders are asked to provide data on legislation and commercial practices. Due to the nature of the information sought and to its possible confidential nature stakeholders are invited to indicate whether they consider any or all information provided as confidential and whether we should anonymize the Minutes of this interview before submitting them to the European Commission. Your personal information will not be shared with anyone outside the research team and the European Commission. It will be collected by DG MOVE's appointed research contractor, Grimaldi, and its partner VVA.

- The information collected will be anonymised. Neither individual nor organisation name or contact details will be identified in Grimaldi's report nor will any information by which the interviewee may be identifiable.
- The information will be stored on secure servers and protected against unauthorised access or unlawful processing. All data will be permanently deleted from the Grimaldi system after the final report is delivered to DG MOVE and for the time necessary to comply with the applicable regulatory requirements.
- The processing of personal data for this study is compliant with applicable data protection laws.

#### Background information/definitions

Integrated ticketing is defined as the purchase of a single ticket that allows passengers to travel using one or more mode(s) of transport provided by one or more operator(s).

Integrated ticketing between different operators and modes of transport implies tight integration between pre-trip and on-trip information, timetables, pricing schemes, regulatory and organisational frameworks, and booking and payment systems.

Ticketing integration is to some extent hindered by legislative, technical and commercial-related hurdles such as defensive strategies applied by big operators and different business models upon which different companies rely, different fare policies and complexities such as fairly sharing of revenues.

Interview – [Organisation affiliation of interviewee]

Date and time:

Interviewees:

Interviewer:

Introductory questions

1. Are/were you involved in projects/initiatives aimed at delivering integrated cross-border and/ or multimodal ticketing in the passenger transport sector?
2. What was/is the geographic scope of such integration?
3. Where applicable, which transport mode/modes does/did the initiative concern?

Section 1: Evaluation of relevant Projects and Studies

4. Are you familiar with any study or report about EU-wide ticketing and payment schemes?
  - If so, which?
  - How is that relevant to your organisation?
  - What could be added to that or other studies that would facilitate the fair data access?

Preliminary questions for project coordinators

To what extent it became easier for passengers to travel with multimodal transport? Is there data showing if:

- The number of passengers has increased in urban transport systems
- The number of passengers has increased in cross border integrated ticketing systems
- Are there any studies or projects that may contain such information?

To what extent did the project improve fare data access?

What factors have influenced the achievements observed?

How affordable were the costs borne by different stakeholder groups, given the benefits they received?

How relevant is the intervention for passengers?

How likely are the effects/results of the project to last after the project ends?

To what extent the project will continue to require EU intervention?

What elements can your project teach us are the lessons of your project that can be useful for this study

- Barriers and how to overcome them
  - o Legal
  - o Commercial
  - o Etc.

- Solutions
- o Legal
- o Commercial
- o Etc.
- other

## Section 2: Legal and commercial barriers and challenges of EU-wide booking and ticketing

5. Where applicable, do you think that the lack of a specific legal framework on integrated ticketing in your country and at the EU level is a major problem for the uptake of integrated ticketing business models?

6. Which are the biggest barriers to tickets' integration in Europe and in your country?

7. Would you argue that the nature of barriers /obstacles varies depending on the combination of modes of transport service provided (i.e. rail/riad versus rail/air) and of the legal status of the service provider (i.e. public versus private)?

8. What are the main barriers to entry in the integrated ticketing market for potential suppliers in your country?

9. What are the main barriers to the introduction of contactless payments being used for transport in your country?

10. If contactless payments are used for transport in your country, to what extent do they hinder the provision of ticketing services by third-party providers?

11. What are the main reasons behind the above challenges?

12. Integrated ticketing system for multimodal transport modes appears to be very challenging to implement. Does your company/organisation experience any of the following challenges?

- ☐ Lack of fare data integration;
- ☐ Lack of data availability;
- ☐ Not sufficient cooperation among operators;
- ☐ Use of different business models;
- ☐ Difficulties in setting up common technological platforms enabling common reservation and distribution systems for multi-modal ticket;
- ☐ Technological limitations;
- ☐ Other

13. Which challenges are more difficult to overcome?

14. Are transport operators concerned about the potential loss of some competitive advantages and the control over their distribution channels when participating in a multimodal information and ticketing system? (e.g. by providing information on schedules, fares or availability)

- If yes, why?
- How do you think it would be possible to address this issue? What should/could be the role of the local/National authorities and the European Commission?

15. Do you believe that operators might be unwilling to join greater collaboration due to the concern that other providers might not be cooperative in an equal manner?

- If yes, why?
- How do you think it would be possible to address this issue? What should/could be the role of the local/National authorities and the European Commission?



16. How important are the following aspects with regard to collaboration with other players?

Please, develop your answer.

- Loss of intellectual property;
- Drain of knowledge;
- Increase complexity;
- Coordination costs;
- Malinvestments;
- Loss of core competence,
- Difference in tickets' prices,
- Fair sharing of revenues
- Allocation of liability
- Number of contracts that will have to be concluded
- Other

### Section 3. Fare Data Access

17. Are there in your country/in countries where you operate specific rules on access to fare data?

18. Do such rules differ substantially across countries and transport modes?

19. What are the legal requirements about pricing information in your country/countries where you operate?

20. Do they differ substantially across countries and transport modes?

21. Were you involved in the conclusion of agreements concerning disclosure of travel and traffic information? Which were the main difficulties in concluding such agreements?

22. Do you consider that mutual trust between the industry players is one of the key challenges to further collaboration in access to fare data?

- If yes, why?
- How do you think it would be possible to build more trust between the industry players?

What should be the role of the local/National authorities and the European Commission?

23. Is your organisation/company dealing with exchanging or sharing fare data among market players? If so, what kind of information? (e.g. schedules, fares, availability, real time information, etc.)

24. In your opinion, how can collaboration between companies be fostered to improve access to fare data? In which circumstances would your company/organisation be willing to share more information?

- What should/could be the role of the local/National authorities and the European Commission?

25. Is your organisation/company participating in any initiative on fare data access?

- If so, which one/s?
- What are your impressions about it?

26. Is your company/organisation willing to engage in greater collaboration regarding fare data access? What would be the motivations for your company/organisation to get involved in greater collaboration with other operators? May your company have complementary interest with other operators to share fare data?

- What should/could be the role of the local/National authorities and the European Commission?
- 27. What conditions/rules should be established in the access to data to avoid undesirable exploitation by the participants in the market? Is your company/organisation reluctant to share certain type of information?
  - Why?
- 28. Do you think that further regulation may be required to ensure that information provision, access to data or participation in an integrated ticketing system is reasonable and non-discriminatory?
  - If yes, what kind of regulation
- 29. Do you think that the establishment of voluntary agreements between companies that govern access to and use of information can foster further collaboration?
  - If yes, what kind of agreements? What would need to happen for those agreements to be initiated?
  - If not, what sort of measures would be required?
- 30. Which authorities are in charge of mobility and transport in your country at national, regional and local level? Are they active in the promotion of integrated ticketing?
  - If so, what are the main initiatives?
    - i. Legislation?
    - ii. Projects?
    - iii. Other
- 31. Do you know any industry initiative or innovation programme supported by the European Commission such as Full Service Model (FSM) and Shift2Rail?
- 32. What should be done at European/national/regional/local level to foster the sharing of fare data with other players?
- 33. Do you have any other remarks, ideas, suggestions, etc., regarding the access to fare data in your country?
- 34. Are there any studies, projects, etc. that you could recommend us to review to learn more about the topic?

#### Section 4. Relevant Legislation and Initiatives

- 35. Are you aware of any national rule/planned initiative requiring transport operators operating domestic passenger services to participate in a common information and integrated ticketing schemes for the supply of integrated tickets and reservations?
- 36. If the answer to the question above is yes, can you explain which are the main elements of such legislation/proposed legislation?
- 37. If the answer to the question above is yes, can you explain which are the main elements of such legislation/proposed legislation?
- 38. Where applicable, which are/were the main challenges related to the implementation/adoption of such rules/proposals?

39. Were you involved in the conclusion/realization and implementation of non-legislative (i.e. voluntary agreements) initiatives concerning integrated ticketing?

40. If the answer to the question above is yes, can you illustrate which issues needed to be addressed? Which of the above issues could not be addressed either due to the lack of a suitable legal framework or for financial/commercial reasons?

#### Section 5. How to overcome existing barriers

41. What are, in your opinion, the issues that need to be addressed in order to promote integrated multimodal ticketing?

42. Which of them can and should be addressed by means of legislative initiatives? Which of them should be addressed at the EU level? At national level? At local level?

43. Which of them cannot be addressed by means of legislative initiatives?

44. Is public funding/more public funding needed to support relevant initiatives?

45. Can you identify EU and/or national legislation that in your view has already/will likely address key barriers to the uptake of integrated ticketing business models?

46. Do you think it would be feasible to create platforms, accessing to multilateral interfaces as an extension of each transport operator's existing web services?

- If yes, how?
- If not, why?
- What should/could be the role of the local/National authorities and the European Commission?

47. Do you think it would be feasible to establish a well-functioning marketplace for integrated ticketing in the medium term?

- If yes, how?
- If not, why?
- What should/could be the role of the local/National authorities and the European Commission?

#### Follow-up

48. Can you direct us to other relevant stakeholders/experts to interview? Who would you propose and why?

49. For associations: would you be willing to forward our targeted survey to your members?

## **Legal Survey Questionnaire Guidelines**

Subject: Remaining challenges for EU-wide integrated ticketing and payment systems – Survey questionnaire addressed to legal experts from companies offering passenger transport services, public authorities and from other organizations who are familiar with issues related to transport and ticket integration

### **Introduction**

This survey forms part of an independent, external study to support the Commission in the assessment of the challenges to delivering integrated ticketing and payment systems. The study, “Remaining challenges for EU-wide integrated ticketing and payment systems” (hereinafter, “study”), was launched by the European Commission in 2017 and is being undertaken by Grimaldi Studio Legale and its partners.

The general objective of this study is to investigate and provide a comprehensive and neutral analysis on the challenges of delivering EU-wide integrated ticketing and on possible actions and initiatives to address them.

This survey is aimed at complementing the data collection exercise carried out by the study research team. Through this survey, the research team aims at identifying concrete legal and commercial barriers that hinder effective integration of different operators and modes of transport into the same ticketing and fare system across road, air, maritime, inland waterways and rail passengers’ transport.

Respondents are advised that a more comprehensive online survey will be running in parallel to the present targeted legal survey.

### **Target audience**

The survey is addressed to experts within public authorities, companies offering transport services, their associations and other organizations who are familiar with issues related to the transport of passengers.

The information provided by each respondent will be treated as reflecting his/her personal understanding of the relevant legislation of his/her Member State as well as of the challenges to delivering integrated ticketing and not as the official position of his/her organization.

### **Data requests and confidentiality**

Stakeholders are asked to provide data on legislation and commercial practices. Due to the nature of the information sought and to its possible confidential nature stakeholders are invited to indicate whether they consider any or all information provided as confidential and whether we should anonymize the reply provided within this survey before submitting it to the European Commission. Your personal information will not be shared with anyone outside the research team and the European Commission. It will be collected by DG MOVE’s appointed research contractor, Grimaldi, and its partner VVA.

- The information collected will be anonymised. Neither individual nor organisation name or contact details will be identified in Grimaldi’s report nor will any information by which a respondent may be identifiable.

- The information will be stored on secure servers and protected against unauthorised access or unlawful processing. All data will be permanently deleted from the Grimaldi system after the final report is delivered to DG MOVE and for the time necessary to comply with the applicable regulatory requirements.

- The processing of personal data for this study is compliant with applicable data protection laws.

You can attach files in response to certain questions to reduce the time taken to complete the survey.

In case you need any additional information about this study or further clarifications on any of the questions, please do not hesitate to contact Grimaldi Studio Legale directly by addressing an email to the following addresses: [dfrisani@grimaldilex.com](mailto:dfrisani@grimaldilex.com) and [sfrazzani@grimaldilex.com](mailto:sfrazzani@grimaldilex.com).

Respondents are welcome to elaborate on their answers in the dedicated text boxes foreseen for this purpose.

#### Additional remarks

Due to the feature of this survey your reply should concern the legislation of/situation in one Member State. Should you be familiar with more than one Member State please provide a separate reply for each Member State concerned by your reply (see question 1).

Should your reply concern the situation at the EU level, please specify this (see question 1).

This survey is divided in five main sections:

1. identification and general questions about your expertise;
2. questions on current legal (i.e. access rights, contractual agreements to sell tickets) and commercial barriers (i.e. business models, competition) and challenges of EU-wide booking and ticketing;
3. questions on legal framework impacting fares data access;
4. questions on relevant legislation and initiatives that mandate or enable access to static/dynamic fare data and integrated ticketing schemes;
5. questions on possible initiatives that could contribute to overcoming existing barriers.

Your response to this survey will help the European Commission understand the current situation and challenges experienced with the legal framework by European and national stakeholders involved in the transport of passengers. Your answer will also help guide future policy directions.

#### Background information/definitions

Integrated ticketing is defined as the purchase of a single ticket that allows passengers to travel using one or more mode(s) of transport provided by one or more operator(s).

Integrated ticketing between different operators and modes of transport implies tight integration between pre-trip and on-trip information, timetables, pricing schemes, regulatory and organisational frameworks, and booking and payment systems.

Ticketing integration is to some extent hindered by legislative, technical and competition-related hurdles such as defensive strategies applied by big operators and different business models upon which different companies rely, different fare policies and complexities such as fairly sharing of revenues.

For the purpose of this questionnaire authorities are: Ministries of Transport, competition law authorities, transport agencies and all authorities either in charge of carrying out controls or involved in contract enforcement and dispute resolution (i.e. courts).

### Introductory Questions

All information provided will remain fully confidential and will not be published. Contact details will help us understand better the population of respondents and to provide the possibility for a follow up on your replies.

Please provide contact details:\*

First Name: \_\_\_\_\_

Last Name: \_\_\_\_\_

Job Role: \_\_\_\_\_

Email Address: \_\_\_\_\_

Phone Number: \_\_\_\_\_

Organization: \_\_\_\_\_

\* compulsory

### Section 1: Introductory Questions

The first questions aim to understand some key aspects about your expertise

1. Which EU Member State is concerned by your reply?

PLEASE SPECIFY

2. What is your area of competence?

Please select all that apply.

- ☐ Road transport
- ☐ Air transport
- ☐ Maritime transport
- ☐ Rail
- ☐ Inland waterway transport
- ☐ Multimodal transport
- ☐ Public transport
- ☐ Government and other administrative authorities
- ☐ Tourism sector
- ☐ Intermediaries (telecommunications operators and financial service providers)
- ☐ Ticket vendor
- ☐ Online booking platform
- ☐ Other

3. If you select "other", please specify.

4. Are you familiar with one or more of the following fields relating to the transport of passengers?

Please select all that apply

- ☐ integrated ticketing
- ☐ Integration between pre-trip and on-trip information
- ☐ Pricing schemes
- ☐ Regulatory and organisational frameworks

- ☐ Booking system
- ☐ Payment system
- ☐ None of them
- ☐ Other

5. If "other", please specify.

## Section 2: Legal and commercial barriers and challenges of EU-wide booking and ticketing

6. Where applicable, do you think that the lack of a specific legal framework on integrated ticketing in your country is a factor preventing the uptake of integrated ticketing business models?
- ☐ Yes
  - ☐ No
  - ☐ I don't know
  - ☐ Other

7. If "other", please specify.

8. Where applicable, do you think that the lack of a specific legal framework on integrated ticketing at the EU level is a factor preventing the uptake of integrated ticketing business models?
- ☐ Yes
  - ☐ No
  - ☐ I don't know
  - ☐ Other

10. Do you believe that the biggest barriers to ticket integration are linked to:
- ☐ Lack of specific rules exempting cooperation under integrated ticketing schemes from the application of national competition rules/EU competition rules
  - ☐ Use of different selling and ticketing distribution systems
  - ☐ Different pricing schemes
  - ☐ Defensive strategies applied by incumbent market operators in the following transport sectors:

- 
- ☐ Anticompetitive agreements
  - ☐ Legal uncertainty/lack of framework concerning passengers' rights in the event of a delay or missed connection and in the event of damage to passengers
  - ☐ Differences in legal regimes governing the rights and obligations of providers of passenger transport services across transport modes
  - ☐ Lack of rules making the integration of ticketing schemes mandatory
  - ☐ Long negotiations between operators are necessary to agree on standards, interfaces and designs data and revenue sharing
  - ☐ Lack of suitable infrastructure
  - ☐ Insufficient demand
  - ☐ Other

11. If "other", "differences in legal regimes", please elaborate

12. Would you argue that the level of integration in the public and private transport varies substantially across the major cities of your country?

- ☐ Yes
- ☐ No
- ☐ There is no integration
- ☐ There is full integration as the law mandates public transport operators to integrate their tariff schemes
- ☐ I do not know
- ☐ Other

13. If "other" "differences in legal regimes", please elaborate

14. Would you argue that the level of integration in integrated ticketing on long-distance passenger transport services varies substantially across regions, major cities of your country?

- ☐ Yes
- ☐ No
- ☐ There is no integration
- ☐ There is full integration as the law mandates transport operators to integrate their tariff schemes
- ☐ I do not know
- ☐ Other

15. If "other" "differences in legal regimes", please elaborate

16. Are there specific national rules on liability of carriers and on passengers' rights which are applicable in case of carriages involving more than one mode of transport?

- ☐ Yes
- ☐ No
- ☐ I do not know

17. If "yes", please elaborate

18. Is the presence of Public Service Obligations on specific routes a barrier to ticketing integration in your Member State/region?

- ☐ Yes
- ☐ No
- ☐ I don't know

19. If "yes", please elaborate

20. Which are the main barriers to entry in the integrated ticketing market for potential suppliers in your country?

- ☐ An overregulation, i.e. the necessity to comply with too many different legal requirements in order to set up an integrated ticketing scheme
- ☐ Refusal to enter into distribution agreements by transport operators



- ☐ Market power of providers of transport services
- ☐ Exclusivity clauses
- ☐ Small size of new entrant
- ☐ Low profit margins
- ☐ Poor geographical reach
- ☐ Other

21. If any of the above please elaborate

22. Which are the main barriers to the introduction of contactless payments being used for transport in your country?

- ☐ The lack of existing business models
- ☐ Limit on transactions imposed by regulation
- ☐ Other

23. If "Limit on transactions imposed by regulation", "other", please elaborate

### Section 3. Fare Data Access

24. Are there in your country specific rules on access to fare data?

- ☐ Yes, and they apply to all transport modes
- ☐ Yes, but they differ depending on the transport mode concerned
- ☐ Yes, but they vary across regions and/or cities
- ☐ No, there are no specific rules
- ☐ Other

25. If "other" "yes, but", please elaborate

26. Which are the legal requirements in your country about disclosure of pricing information?

- ☐ A repartition of prices for each linked journey is required
- ☐ They vary depending on the transport mode
- ☐ An indication of the elements of the price
- ☐ Other

27. If "other", please elaborate

28. Which is in your experience the main barrier to the disclosure of travel and traffic information in an integrated system/agreement?

- ☐ the sensitive nature of data
- ☐ the risk that the access to information results in an operator becoming dominant
- ☐ other

29. If "other", please elaborate

30. Are there any data formats regulatory requirements in your country?

- ☐ Yes
- ☐ No
- ☐ I don't know

31. If "yes", please elaborate

#### Section 4. Relevant Legislation and Initiatives

32. Are there rules requiring transport operators operating domestic passenger services to participate in common information and integrated ticketing schemes for the supply of integrated tickets and/or reservations?

- ☐ Yes
- ☐ No
- ☐ Other
- ☐ I don't know

33. If "yes" "other", please elaborate

34. Are there rules /legislative proposals in your country that regulate/if approved will regulate to some extent ticket integration?

- ☐ Yes, and they facilitate ticket integration
- ☐ Yes, and they prevent/indirectly prevent ticket integration
- ☐ No, there are no specific rules dealing with ticket integration. This is left to the initiative of transport operators
- ☐ No, there are no specific rules, but our national competition/transport authority has issued guidelines on how to ensure that such integration is compliant with the relevant applicable rules
- ☐ There are no general rules, there are rules concerning the following transport mode/s/sector/s:
- ☐ Other

35. If "yes", "no" "other", please elaborate and, where possible, provide text of the relevant legislation/ guidelines

36. Please list which are/were the main challenges related to the implementation of such rules?

37. Are you aware of any legislative initiative aimed at promoting/regulating integrated ticketing schemes?

- ☐ Yes
- ☐ No
- ☐ Other
- ☐ I don't know

38. If "yes" "other" please elaborate and, where possible, please provide the text of the proposed measure. If yes please specify whether the proposal concerns either all modes or one or more transport modes.
39. Is there relevant legislation in your MS that mandates or enables access to static/dynamic fare data?
- ☐ Yes  
☐ No  
☐ Other  
☐ I don't know
40. If "yes" "other" please elaborate and, where possible, please provide the text of the measure. If yes please specify whether the rules concern either all modes or one or more transport modes.
41. Please list which are/were the main challenges related to the implementation of such rules?
42. Are you aware of any legislative initiative aimed at either mandating or enabling access to static/dynamic fare data?
- ☐ Yes  
☐ No  
☐ Other  
☐ I don't know
43. If "yes" "other" please elaborate and, where possible, please provide the text of the proposed measure. If yes please specify whether the proposal concerns either all modes or one or more transport modes
44. Are you aware of non-legislative (i.e. voluntary agreements) initiatives concerning integrated ticketing
- ☐ Yes  
☐ Yes, integration is mostly based on code-sharing agreements  
☐ No  
☐ Other  
☐ I don't know
45. If "yes" "other" please elaborate and, where possible, please specify whether the initiatives concern either all modes or one or more transport modes and whether they are local initiatives.
46. Which aspects needed to be dealt with in such voluntary agreements on integrated ticketing?
- ☐ Allocation of liability  
☐ Rebooking

- ☐ Confidentiality of information exchanged
- ☐ Obligations of information toward passengers
- ☐ Ownership of data
- ☐ Other
- ☐ I do not know
- ☐ Fair revenue sharing

47. If "other" please elaborate

#### Section 5. How to overcome existing barriers

48. What are, in your opinion, the legal and commercial issues that need to be addressed in order to promote integrated ticketing?

- ☐ Rules on access to fares
- ☐ Refusals to deal, i.e. refusal to conclude distribution agreements by incumbent transport operators
- ☐ Establishing appropriate judicial remedies applicable in case transport operators refuse to deal or to provide necessary information (i.e. injunctions)
- ☐ Lack of specific legal regime on multimodal passenger transport services
- ☐ Promoting multilateralism, i.e. a situation in which several different organizations work together to achieve something or deal with a problem, as opposed to bilateralism in current agreements concerning service schemes and tariffs
- ☐ Promoting common standards in relation to booking, ticketing and tariff schemes across modes
- ☐ Access to dynamic fares data
- ☐ Other
- ☐ I don't know

49. If "yes" "other" please elaborate and specify, for each of the identified issues, whether the most suitable way to tackle it is either a legislative initiative or a non-legislative initiative, or both.

50. To what extent the implementation of Regulation 454/2011 which lays down the Technical Specifications for Interoperability (TSI) regarding the sub-system "Telematics Applications for Passenger services" (TAP) has removed existing barriers to integrated ticketing in the rail sector? Please elaborate

51. To what extent the implementation of the provisions of the Fourth Rail Package on a common information and through-ticketing schemes (Article 13a Directive (EU) 2016/2370) have the potential to remove existing barriers to integrated ticketing in the rail sector? Please elaborate

52. Which level (and why) is the most appropriate to set the policy for integrated ticketing and to provide the framework for implementation?

- ☐ regional
- ☐ national
- ☐ EU

Please elaborate

Other suggestions

53. Are there any other issues that should be considered which are not mentioned in the questions above?

( ) No

( ) Yes (please specify)

## Table 4 Fare data access interview guide

### Fare Data Access

1. What are the rules on access to fare data in your MS?

a. To which transport sector do they apply?

- ☐ Air
- ☐ Bike sharing
- ☐ Bus
- ☐ Coach, trolley bus
- ☐ Car-pooling and car sharing
- ☐ Metro, Tram
- ☐ Rail
- ☐ Road
- ☐ Taxi, water taxi
- ☐ Other, please specify

b. Do the rules differ substantially across transport modes?

2. What are the rules about giving access to pricing information?

a. Do they differ substantially across countries and transport modes?

3. Are you aware about the existence of agreements between the private operators concerning disclosure of travel and traffic information?

a. If yes, what were the main challenges in achieving such agreements?

b. To which transport modes do they apply?

4. Are there organisations/companies dealing with exchanging or sharing fare data among market players in your MS? If so, what kind of information? (e.g. schedules, fares, availability, real time information, etc.)

☐ Air

- ☐ Bike sharing
- ☐ Bus
- ☐ Coach, trolley bus
- ☐ Car-pooling and car sharing
- ☐ Metro, Tram
- ☐ Road
- ☐ Taxi, water taxi
- ☐ Other, please specify

5. In your opinion, how can collaboration between companies be fostered to improve access to fare data?

- What should/could be the role of the local/National authorities and the European Commission?

6. Are you aware of any initiative on fare data access in your MS?

- If so, which one/s?

- ☐ Air
- ☐ Bike sharing
- ☐ Bus
- ☐ Coach, trolley bus
- ☐ Car-pooling and car sharing
- ☐ Metro, Tram
- ☐ Road
- ☐ Taxi, water taxi
- ☐ Other, please specify

- What are your impressions about it?

7. Are companies/organisations willing to engage in greater collaboration regarding fare data access? What would be the motivations for companies/organisations to get involved in greater collaboration with other operators?

- What should/could be the role of the local/National authorities and the European Commission?

8. What conditions/rules should be established in the access to data to avoid undesirable exploitation by the participants in the market? Are companies/organisations reluctant to share certain type of information?

- Why?
- For which kinds of transport?
  - ☐ Air
  - ☐ Bike sharing
  - ☐ Bus
  - ☐ Coach, trolley bus

- ☐ Car-pooling and car sharing
- ☐ Metro, Tram
- ☐ Road
- ☐ Taxi, water taxi
- ☐ Other, please specify

Do you think that further regulation may be required to ensure that information provision, access to data or participation in an integrated ticketing system is reasonable and non-discriminatory?

- If yes, what kind of regulation

For which kind of transport?

- ☐ Air
- ☐ Bike sharing
- ☐ Bus
- ☐ Coach, trolley bus
- ☐ Car-pooling and car sharing
- ☐ Metro, Tram
- ☐ Road
- ☐ Taxi, water taxi
- ☐ Other, please specify

9. Do you think that the establishment of voluntary agreements between companies that govern access to and use of information can foster further collaboration?

- If yes, what kind of agreements? What would need to happen for those agreements to be initiated?
- If not, what sort of measures would be required?

10. Which authorities are in charge of mobility and transport in your country at national, regional and local level? Are they active in the promotion of integrated ticketing?

- If so, what are the main initiatives?

i. Legislation?

ii. Projects?

iii. Other

11. Do you know any industry initiative or innovation programme supported by the European Commission such as Full Service Model (FSM) and Shift2Rail?

12. What should be done at European/national/regional/local level to foster the sharing of fare data with other players?

13. Do you have any other remarks, ideas, suggestions, etc., regarding the access to fare data

in your country?

14. Are there any studies, projects, etc. that you could recommend us to review to learn more about the topic?



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