

Contribution by Foundation for a Free Information Infrastructure



The Foundation for a Free Information Infrastructure (FFII) is a non-profit association registered in several European countries, which is dedicated to the spread of data processing literacy. FFII supports the development of public information goods based on copyright, free competition, open standards. More than 650 members, 3,000 companies and 90,000 supporters have entrusted the FFII to act as their voice in public policy questions concerning exclusion rights (intellectual property) in data processing.

Question 1: Given that passengers of other modes of transport enjoy many rights under international or Community regulations which are not offered to bus and coach passengers, do you agree that equal treatment (a "level playing field") should be ensured between bus and coach operators in different Member States in terms of protection of passengers' rights?

Yes. But distinguish local lines from regional or international lines which compete with train and plane. The provisions have to take account of the transport situation in less developed member states.

Question 2: Should this be addressed at EU level? What are the most cost-effective means to meet this objective?

Yes. Market driven approaches.

Question 3: Should only international services be regulated and domestic services be left to each Member State?

Set minimum standards.

Question 4: Is any legislative action necessary to improve intermodality between coach services and other modes of transport? If so, what action in particular?

It is important to open up databases of travel providers. Route and timetable shall be provided based on open standards for free commercial use, so internet based travel agencies can provide travel information systems independent from individual providers and different means of transportation. This data must be provided free of charge, so competition of information systems can take place.

Question 21: Should coach operators be required to provide for the transport of equipment for persons with reduced mobility (i.e. wheel chairs). Given the design of their vehicles is this feasible?

No.

Question 27: Should organisations representing persons with reduced mobility be involved in consultations concerning all identified shortcomings in bus and coach transport?

Yes.

Question 28: Is there a need to establish quality and reliability standards for international coach services at EU level? Or should coach operators be required to develop public quality standards for international services?

Obligation to publish timetable and travel data based on open standards and for free reuse.

Question 29: If so, how should compliance with the quality standards be monitored?

Establish a quality standard certificate which service operators can obtain. Monitor services providers and travel information agencies.

Question 30: What essential performance indicators should be measured and disclosed by coach operators? Is the following list of quality standards adequate?

- Punctuality (departures, arrivals, stops en route)
- Delays
- Level of user satisfaction
- Cancellations
- Interruption of journey
- Comfort
- Accessibility for persons with reduced mobility

External monitoring is needed.

Question 31: Which of the conditions of carriage should be at least mentioned on the ticket?

Unimportant.

Question 32: Should standard conditions of carriage be attached to passengers' tickets?

no

Question 33: How can access to information on conditions of carriage and fares be improved?

Use of unified scheme based on open standards for timetable data and obligation to publish.

Question 36: Should a complaint-handling mechanism be regulated at EU level?

Yes.

Question 37: Should a one-stop shop be set up for handling complaints about international services?

Keep institutional overhead low.

Question 40: Should the number of complaints received by bus and coach

operators (broken down by category, average time to handle the complaint, etc.) be made public?

The freedom to publish information by third parties shall be ensured. But the number is no useful indicator. Be concerned about possible misuse.

Question 41: What role could consumer bodies play in handling individual complaints?

Collective intelligence.

Question 42: Should there be mandatory consultations between consumer organisations and coach operators? If so, what issues should they cover (e.g. investigation of complaints not satisfactorily addressed by coach operators, consultation on changes of timetables, fares, conditions of carriage, compliance with users' rights).

no.

Question 46: What experience have you had concerning self-regulation of user/customer care rights at national level?

Often less organised nations perform better than states with organised care systems because there are working social networks. Information systems lack open access and interoperability.

Bug reporting systems (software problem reports by users to the developers) used in software development can be regarded as best practice. See e.g.
<http://mantis.sf.net>
<http://www.bugzilla.org>

Question 47: How should the European Commission encourage self-regulation schemes aiming at improving users' rights?

Monitoring, third party quality certificates

Question 49: What is your opinion on inclusion of coach services in integrated ticketing systems?

The open standards for timetable solution is a first step to an integrated system. It enables the inclusion of further travel systems such as train and airplane. It is important to make the data freely available, so competition of information systems can take place on the market. It is not useful to enforce the use of a single system or establish control over the data.