

APC's comments in response to the questionnaire

Need for regulation

- Question 1: The lack of Community legislation, the fact that there are eight new Member States where coach travel plays an important part, and that there has been an increase in coach services especially to central and eastern Europe have all had a negative impact not only on competition between coach operators (and between coach operators and other transport modes), but also to the detriment of passengers. One such negative development has been the increase in clandestine (illegal) transport services. The level playing field (equal treatment) proposed is absolutely necessary, not least because the other modes of transport already have one.
- Question 2: The need for regulation must be addressed at EU level. Issues that require regulatory measures must be analysed, prioritised and compared against national legislation (if it exists). Only then can each proposed measure be quantified in terms of cost.

Scope of regulation

- Question 3: Regulation is also absolutely essential for domestic services. Exactly the same conditions must apply to passengers for the entire duration of their journey, regardless of which country their coach is currently in or heading to. Bus stations in European cities are not only destinations for coach passengers, but also places where they transfer from international bus services to domestic bus services.
- In our opinion, the need for regulation is much more problematic for trips from an EU Member State to a non-EU State. How do the rights of passengers change (including their rights vis-à-vis their coach operator) when they cross the border on a trip from Warsaw to Minsk? This issue, and the problem of transit through Kaliningrad, must be addressed separately, if necessary.
- Question 4: There is much room for improvement in the current situation. This shows that the lack of appropriate legislation is, ultimately, to the detriment of passengers. From our point of view, priority must be given to ensuring that passengers are provided with information about:
- a) alternative means of reaching their destination (freedom to choose between the modes of transport available);
 - b) possible connections and transfers (including local transport services).

Liability schemes

Questions 5–13: Should be answered by national authorities and coach operators.

Cancellation, denied boarding and interruption of journey

Questions 14–15: We agree in principle. However, it should also be borne in mind that coach operators will definitely pass on these financial risks to passengers. Furthermore, larger operators will be able to bear these additional costs more easily than small operators (i.e. there could be a distortion of competition to the detriment of small and medium-sized companies).

Significant delays

Questions 16–18: Coach operators should only have to accept responsibility for delays due to late departures. Most delays, though, are caused by sudden unforeseeable traffic conditions along the route, or by slow border-control procedures and therefore cannot be blamed on the coach operator.

Persons with reduced mobility

Questions 19–27: Providing transport for persons with reduced mobility is, in our opinion, a high-priority issue. However, the questions raised by this issue cannot be answered in a few words. Berlin's main public-transport company, Berliner Verkehrsbetriebe (BVG), drew up a report entitled "Accessibility of Urban Transport to People with Reduced Mobility" for the European Commission. The chairman of our advisory committee, Mr Andris Mamis, who played a key role in drawing up this report has said that you should not hesitate to contact him if you have any further questions.

Quality standards

Question 28: Quality and reliability standards are absolutely essential. Standards should be developed by consulting with coach operators (but under no circumstances should coach operators be the only stakeholders involved).

Question 29: At EU level by a neutral institution.

Question 30: List needs to be added to (e.g. standards for toilet facilities during breaks in journey, availability of meals and refreshments en route, and many more).

Information obligations

Questions 31–32: There is a need for clarification here because the current situation in each of the EU Member States has to be analysed before practices can be harmonised.

Question 33: Our eTEN project proposal provides a comprehensive overview of the options available. If the members of the project consortium agree, this document can be made available.

Question 34: See answers to questions 19-27.

Question 35: Within a reasonable period of time.

Complaint handling

Questions 36–46: APC is not in a position to answer these questions.

Self-regulation

Questions 47–48: APC is not in a position to answer these questions.

Integrated ticketing

Question 49: Integrated ticketing is a goal well worth working towards. However, an integrated ticketing system has to be set up for European coach transport first. In our opinion, this will only be possible in the medium term.