



**Position of the UITP European Union Committee
answering the European Consultation on
“Development of Integrated Ticketing for Air and Rail Transport”**

Brussels, September 2008

The European Commission has opened in summer 2008 a consultation on “Development of Integrated Ticketing for Air and Rail Transport”, with the objective of examining the organisational and technical opportunities related to the development of integrated ticketing as announced in the Communication on passenger rights (COM(2005) 46 final) and reaffirmed in the Communication on airport capacity (COM(2006) 819 final). According to the Commission, the introduction of integrated ticketing [which may include urban public transport] can be an important factor to generate demand for intermodal air-rail services and it requires the development of sale and promotion of integrated information, reservation and sales systems. The Commission has developed a questionnaire in order “to open a debate on a voluntary engagement of the concerned stakeholders”.

The European Union Committee of UITP (International Association of Public Transport) represents the views of the operators of urban, suburban and regional collective passenger transport sector by rail, by road and waterborne (www.uitp.org) in the European Union. UITP has been recognized by the European Commission as a “European representative rail association”. The following document presents the UITP’s answer to the questionnaire.

Scope of air-rail integrated ticketing

Question 1. What is in your opinion the market potential for these services?

This question should come after the question 2 on the scope of integrated ticketing. Indeed, the paragraph 5.1 (Scope of air-rail integration) of the Consultation document states that “In a second stage, it would also be advisable to ensure the continuity of the whole journey by adding¹ public transport (buses, underground railway, train) which serve the urban centres.”

In fact, there are three different markets where a coordination – and not necessarily full integration – of ticketing and information between air services and rail and public transport services could generate demand benefiting from intermodality/comodality between modes.

Market 1: Passengers using Air and/or Rail services as an alternative to Air services alone. Rail means in this case High Speed Rail (HSR) services of several hundred kilometers. The main competitor for Rail is Air.

¹ UITP: [to the integrated information, reservation and sales systems].

Market 2: Passengers using both Air and Rail services as complementary modes, with a rail travel on a medium distance service by either High Speed Rail or Conventional Rail (from half hundred to several hundred kilometers) in continuation of an Air service. The main competitor for Rail is private car.

Market 3: Passengers using Air and Rail services as complementary modes, with a rail service being operated as part of a local/regional public transport system (often split between a local rail service operated on a commercial basis, and a public transport service by rail or road or even waterborne being operated on the basis of a public service contract). The main competitor for rail/public transport is either private means (mainly private car) or taxi.

All these three markets have a real potential. The third one covering short distance rail/public transport services as access/egress modes to medium long distance Air-Rail services is in fact an additional component of the two first markets. From the point of view of UITP, it is probably the most important one, and in any case should be regarded neither as a “second class” market nor as a future extension to local public transport of integrated ticketing developed for medium-long distance air-rail services. UITP estimates that currently at least 10 times more passengers use public transport to and from airports than a long distance train connection.²

Question 2. What are your comments on the scope of integrated ticketing as proposed, as a first step, at point 5.1? Do you think that the scope should be extended to other modes of public transport?

We agree with the Commission on the point that “trying to include now public transport into the intermodal scheme would be unrealistic and likely considerably to slow down the introduction of an intermodal service”³, but only as long as the “intermodal scheme” is the one described by the Commission.

We disagree with the Commission's opinion that seamless air-rail travel including local public transport always requires a complex intermodal scheme. The Commission states that “the objective of the integrated air-rail ticketing is to make it possible for a traveller to obtain - directly (from Internet or a vending machine) or through a salesman (travel agency or transport operator) – one or more transport documents enabling him/her to take successively at least a train and a plane, by obtaining the best possible combination according to criteria such as schedules, price or associated services. The integrated ticketing implies the integration at information level (schedule and price) and at reservation level (access to the inventories of available places and issuance of the ticket)”⁴. We believe that, under some prerequisite conditions - the objective of seamless travel can be achieved much more simply for air or rail services combined with local public transport.

Indeed, there are already examples - like in Germany - where long distance rail passengers (DB Bahncard users) can obtain directly or through a salesman a rail ticket including an access to the local public transport services (City Ticket)⁵. This kind of service (already more than 100 million tickets sold in Germany since

² e.g. 20-35 % of air passengers at major German airports (Berlin Tegel, Frankfurt, Munich, Stuttgart, etc.) use local public transport prior or after their air trip.

³ Paragraph 5.1, page 10.

⁴ Paragraph 4.1 page 5.

⁵ Cooperation between Deutsche Bahn AG and Verband Deutscher Verkehrsunternehmen: DB Bahncard customers can use local public transport networks at their destination (currently in 109 German cities) when buying a long distance train ticket > 100 km. Introduction 2003.

2003) could be immediately proposed as well to air passengers⁶, and of course it does not imply the integration of the public transport services, neither at information level, nor at reservation level. It requires in fact two conditions:

- a commercial agreement between the different involved partners;
- an “open” access to the public transport system.

The case of “closed” public transport systems – where a passenger has to cross a gate to enter and exit the system - is a fully different issue. No simple intermodal solution can be found for a passenger using a ticket (boarding pass or rail ticket) on which the validation code can easily be copied (e.g. bar-code on a paper ticket or SMS ticket). We totally agree that the coordination-integration between air, rail and such public transport systems can only be achieved in a second stage. However the case of “Integrated Fare Management (IFM)” of “closed” public transport systems is addressed by a European Research Project currently underway, called IFM-Project. In parallel, UITP has created an IFM-Forum where interested parties can exchange their opinion about Integrated Fare Management of public transport systems. IFM-Project and IFM-Forum are focusing on (contactless) ticketing used by European citizens who are regular customers of public transport traveling throughout Europe. What is developed within IFM-Project could be used “by extension” for air and rail travel (with only one device supporting different fare platforms).

Question 3. What are, according to you, the connections on which air-rail services are possible, in particular in relation to the criterion of the quality of the airport/railway station interface?

The market potential for a better coordination/integration of Air-Rail information and ticketing is conditioned by the quality of the coordination/integration of the various services in physical and operational terms: there is no real market potential for integrated ticketing in the case of daunting connection between modes in terms of length and comfort of the interchange(s) between modes, especially from the point of view of passengers with luggage, or in terms of frequency and availability over the day time of the rail/public transport services.

The connections on which air-rail services are possible are therefore those providing:

- high quality “physical” access to/from the airport terminal to/from the railway station and/or the public transport system (the accessibility has to take account of the handling and recovery of luggage within the air terminal), that is a connection with e.g. very limited walking distance, easy way finding, attractive environment;
- clock faced services for medium-long distance rail services offered in the rail station serving the airport;
- remote access for a seat reservation in the case of medium-long distance rail services connected to air.

Of course the connecting High Speed Rail or Conventional Rail services departing the station serving the air terminal have to provide fast access to rail stations properly located in major city centers.

In the case of a connection with public transport systems serving air terminals, a specific challenge is to properly inform the passenger about the location of the services, and defining ways to avoid this passenger (usually with luggage) making a queue for purchasing/validating a ticket.

⁶ Already about 100 airliners and tour operators (such as TUI, Germanwings, Airtours...) offer the option of purchasing long distance train ticket in Germany (DB) in combination with an international flight ticket (through Internet, travel agency...).

Institutional framework

Question 4. What is your opinion on the feasibility and the contents of the voluntary agreement as proposed at point 5.2? Would you be ready to take part in it?

According to the Consultation document: "The agreement should comprise in particular the following clauses:

- the engagement⁷ to develop an integrated ticketing system open to all operators (including future high speed rail operators);
- the obligation to share certain data between the operators, in particular on the schedules, tariffs and associated services. This obligation will be extended in the long term to cover public transport operators (buses, metro, and train) which serve the urban centres in order to be able to cover also "the last mile" of the intermodal journey."

Some rail links between the city and the airport are operated on a commercial basis, but most – if not all⁸ - local public transport services are operated under public service contracts. According to Regulation 1370/2007/EC on public passenger transport services by rail and by road (Recital 17), all what relates to social and quality standards for e.g. passenger rights and needs of persons with reduced mobility falls under the responsibility of competent authorities in charge of public transport services operated under public service contracts, in keeping with the principle of subsidiarity. Information services and ticketing services are part of social and quality specifications of public service contracts.

UITP's opinion is that the Commission should not interfere in the local rail/public transport agreements (information and ticketing) which are provided under public service contracts. These matters are exclusively ruled by contracts signed between operators and authorities. The coordination between different public transport systems has to be based on mutual agreements of the relevant local stakeholders.

However the Commission is currently supporting the European public transport industry (both manufacturers and operators) in the definition of appropriate technical solutions able to better serve the European market thanks to the development of voluntary technical harmonization and standardisation, e.g. through granting part or all of European Research projects like IFM-Project mentioned above. UITP encourages the Commission in that way, taking into accounts the fragmentation of the public transport sector and the progress achieved by the competing private car mode.

Technical aspects of the integrated ticketing

Question 5. What are your comments on the technical solution proposed for the integrated air-rail ticketing and the operating mode of the system as described at point 5.3? Do you see any problems related to it and if so, which ones? Can you envisage any alternative solution which could be satisfactory as far as a swift and economical implementation is concerned?

The technical solution proposed for integrated air-rail ticketing cannot be extended to public transport services connected to airports. The total number of air passengers is very low compared with the number of public transport passengers. As an example, the total traffic of the first region in Europe in terms of Air traffic, the Ile-de-France Region, is a bit more than 80 million air passengers per year, while for public transport the traffic (RATP+SNCF+OPTILE) exceeds 3.6 billion passengers per year. Public transport in this Region carries around 44 times more passengers than air. This example illustrates that it is impossible – and totally

⁷ This means probably "commitment" in European English.

⁸ Except in a few countries like UK.

inappropriate - to extend to local public transport – especially for “closed” systems - solutions which have been developed for long distance air – or rail – transport.

There are numerous technical obstacles for a proper coordination/integration of information and sales between long/medium distance air-rail services and local public transport services, e.g. the number of different local passenger services, the variety of fares, the variety of fare systems, the number of stakeholders (authorities and operators) involved, the differences in validation systems, the different approaches towards privacy in the air sector and in public transport...

The security constraints imposed to the air sector within the Schengen Area cannot be accepted for other modes, neither for medium-long distance rail services nor for local public transport services.

As mentioned above alternative solutions to integrated information and ticketing can be implemented for the coordination between air, rail and local public transport:

- for “open” public transport systems, through agreements between air (and/or rail companies) and public transport operators allowing the use of public transport systems by air passengers, as it has been achieved in Germany between DB and VDV
- for “closed” public transport systems, and for ticketing only⁹, through agreements between public transport fare system managers from the greater interoperable fare regions of Europe, later enlarged to long distance air and rail operators, following the recommendations expected from the European Research IFM Project.

Project management

Question 6. Which is the most appropriate management structure for the first phase of this project?

This question is not relevant for UITP, since local public transport is not included in the first phase of the Commission's project.

However, as regard coordinated ticketing, even in the first stage, bilateral or multilateral agreements can be immediately developed between “open” public transport systems operators and airlines, airports and railway undertakings.

Operational aspects

Question 7. Are the problems involved in air-rail integration mainly of an operational nature or are they rather related to the distribution of the product? In the first case, please specify.

As pointed out by question 3, air-rail integration gathers many more aspects than information and ticketing. In any case, the major message is that commercial agreements are under the responsibility of the parties involved only.

Question 8. How important is it to travel with registered luggage on the entirety of the intermodal journey? Which solutions do you envisage?

The question is not fully clear. Travel with registered luggage probably means traveling without luggage after having registered it and left in a given place, and collecting it up at the end of the intermodal travel in another

⁹ As for information, the situation is even more complex and no harmonized approach has yet been defined between public transport operators.

given location. Traveling with registered luggage on the entirety of the intermodal journey is for practical reasons¹⁰ a very small “niche” of services. Only a very limited number of origins and destinations – railway stations or major public transport terminals or new locations – can be envisaged for registering and collecting registered luggage. The air security rules are very different from the usual luggage handling rules in rail services. Maybe specific conveyer belts could be implemented in airports for luggage delivery to air-rail passengers when the rail service is provided within or closed to the air terminal, if such solution could save time for this category of passengers? Or maybe new services – avoiding or limiting walking - could be proposed within the airport to accompany air-rail passengers and their luggage between their air arrival point and the rail coach they shall use in the “connecting” train?

Your suggestions

Question 9. Do you have further comments on the text of the document? Do you have suggestions regarding action at Community level which was not mentioned in this document?

The Consultation document shows that there is a lack of knowledge within the Commission of the characteristics and specific features of the local public transport sector within Europe. The market of local public transport services operated under public service contracts, (urban and suburban bus as well as urban, suburban and regional rail services) has very few to be compared with the commercial trans-European air or rail services, and the travel needs are totally different for a long/medium distance trip and for a short distance trip. There is in fact neither need nor real expectation from most of local public transport passengers to benefit from transport intermodality over Europe.

Many appropriate solutions have been developed at a local (and sometimes national) level in terms of integrated information and ticketing systems, which cannot be over ruled by European specifications benefiting only to a few per cent (and most often even far less) of the customers.

There is a market potential resulting from a better coordination between long/medium distance air and rail services with local public transport services. The services proposed to serve this market cannot be developed from a long distance intermodality perspective, and in any case they have to be based on voluntary agreements with the relevant partners: operators, relevant authorities and the manufacturing industry, and in some cases their associations.

In addition, it must be clear that:

- when speaking about a travel chain created by air-rail ticketing solutions, the passenger rights should be limited in the case of delays or missed train connections causing the missing of flights. It would be impossible to extend the passenger rights of rail passengers to the air passenger, especially with regard to refunding of tickets;
- from the technical point of view, developments shall be compliant with public open standards.

UITP welcomes however initiatives taken by the Commission in the sector of Research and Development to propose and promote solutions for improving the transport market when developed in cooperation with the sector and UITP is fully ready to cooperate with the Commission for the identification of such issues.

¹⁰ including security controls and secure transport of registered luggage along the intermodal transport chain, and including as well lost luggage management.