DER FLUGHAFENVERBAND **ADV**

**Public consultation document of the European Commission services
Directorate-General "Energy and Transport"**

Development of integrated ticketing for air and rail transport

ADV – German Airports Association's contribution

Sept. 30, 2008

Scope of air-rail integrated ticketing

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

It is not quite clear how the market potential is being defined by DG TREN. The German Airports Association ADV believes that the definition depends on the viewpoints of the different market participants.

For an airline and an airport, the market potential represents the additional potential of passengers that can be attracted by more convenient travel conditions before and/or after a flight trip due to integrated air/rail tickets, namely passengers that otherwise wouldn't have flown with an airline or from/to an airport, resp.

For a railway company operating (HST) connections to/from an airport, the market potential represents the number of passengers that decide to take a (HST) train to/from the airport because there is an integrated air/rail ticketing instead of using other means of transport to get to their flight.

Both cannot be determined easily. The only estimation being available to ADV is from a survey of the Intermodality Working Group of the German „Initiative Luftverkehr". Provided a set of measures[1] is implemented on a number of German airports. As a result, half a million additional airline and four million additional railway passengers were estimated. This study has proven that the availability of long range destinations is a major precondition of intermodality.

At non-hub, non-congested airports the required minimum connecting times would be rather hard to guarantee, especially if baggage services are offered.

In the end, it will be crucial to demonstrate the benefits for both airlines and railway operators.

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?

ADV supports the idea to limit the initiative as a first step to airports that already have a HST connection, as described under 5.1 (first bulletpoint). In Germany, these airports are: Frankfurt, Düsseldorf, Cologne (please note) and Leipzig. Apart from this, ADV strongly supports all efforts to realise a high performance railway connection between Munich airport

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[1] Check-in via internet or at HST stations, no baggage service but baggage drop-off / pick-up at airport stations, secured connecting flights, reduced minimum connecting time 60 min, one tariff (service scenario)

and Munich main station. Recent analyses of Munich airport have revealed that even today a reasonable amount of passengers uses railway services to Munich main station to get to their flight or continue their travel after arrival at Munich airport.

From the security point of view, ADV opposes the idea of performing security checks of hold baggage outside airports (e.g. railway stations or trains). It is merely impossible to ensure the high level of aviation security along the whole line of transportation without tremendous investments that would not balance their benefits.

ADV believes that the scope of the process should, at a later stage, be extended to local and regional public transport. It might also be worthwhile to consider medium and long distance coach services. Such services would allow for a publicly accessible and environmentally friendly connection of regions of lower demand with airports (and subsequently other destinations). Coaches have a better environmental footprint than trains. Unfortunately, coach service concessions are legally restricted in Germany.

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?

For competition reasons, an "interlining" between airlines and railway service providers is probably more likely to be accepted on city pairs / connections where there is no parallel air and rail service. From the airlines' point of view, it is crucial that railway services are adapted to flight schedules and that there is a proven potential demand to justify such adjustments to railway schedules.

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?

Airports can only play a supporting role in the proposed process. If, at a later stage, local and regional public transport would be integrated, airport operators could act as a collecting agency and sales partner for PT operators.

Voluntary agreements are the only feasible way to introduce integrated air/rail ticketing. In order to increase their attractiveness, the market potential should be clearly defined and demonstrated.

Munich airport, an ADV member, has declared its willingness to participate and share experience in the proposed process.

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?

This question ought to be answered by airlines and railway companies.

Integrated ticketing is only feasible if there is a ICAO-3-letter-code assigned to all final (railway-)destinations in the CRS.

Project management

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

ADV proposes the establishment of a high level EU project steering committee, comprising representatives of railway companies, GDS providers, airlines and airports, as well as EU COM representatives.

ADV supposes that there are differences between EU member states regarding technical/infrastructural, legal and market conditions of integrated air/rail ticketing. On the national level, project groups of the same stakeholders plus national ministries of transport or other authorities should therefore:

- analyse/forecast the market potential of integrated air/rail ticketing,

- analyse the technical/infrastructural, legal and market conditions and necessary adaptations,

- elaborate a strategy how to implement integrated rail/air ticketing on national level,

- deliver a status and strategy report to the EU project steering committee.

The EU project steering committee should then analyse the status and strategy reports of the national project groups and, based on this analysis, deliver a detailed report with suggestions on how to implement an EU wide integrated air/rail ticketing to the Commission.

Generally, all efforts being made should focus mainly on hub airports and must not lead to more bureaucracy and statism.

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.

This question should be answered by the railway companies and airlines involved.

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

It'd be useful and convenient (but not indispensable) for travellers to deliver their luggage at the railway station of origin and to collect it at the destination (airport or railway station). Security checks should not be performed in other places than at the airport, see question 2.

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?

See question 6.

Ralf Wagner, ADV