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European Commission - DGTREN –Unit F4- Integrated Ticketing Consultation  
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## Public consultation - Development of Integrated Ticketing for Air and Rail Transport

Dear Sir or Madam,

routeRANK is an independent online search engine helping travellers with finding their best travel route. Unlike current travel websites that consider only one transport medium at a time – most often flights – routeRANK addresses the entire door-to-door journey and combines road, air and rail travel in a single view. This allows users to find the overall best route according to their personal criteria – including travel time, price and CO2 emissions - , and with a single search. Different modes of transport are fully integrated in the route computation and optimization, rather than merely presented sequentially or side-by-side. The technology allowing these user benefits has been developed specifically for this application and is protected by a two patents and a trademark.

The routeRANK website provides aggregated information on all the possible travel routes. Unlike other travel websites, routeRANK does not sell or resell tickets. Given the current state of the market, users interested in a particular route are forwarded to participating travel companies' websites for details and online ticket purchase. As such, we understand the technical challenges and commercial limitations related to integrated ticketing.

For example, a routeRANK user wanting to travel from Lausanne to Hannover - regarding Easyjet via Geneva or Air Berlin via Zürich as cheap flights - would find that the rail route compares favourably in both total price and total duration with routes involving flights, and also with driving by car. Moreover, the rail route would be found to be the most environmentally friendly (total CO2 emissions). Being independent from all transport providers, users benefit from being able to compare objective results for all forms of transport and other criteria.

A first group of travel providers will be included in the launch of routeRANK's public website ([www.routerank.com](http://www.routerank.com)) in October 2008. Currently eleven agencies and travel providers are supporting us with a data interface and we have commitments from several others.

routeRANK is at a unique position, providing consumers with an integrated, inter-modal service for air and rail transport. We therefore consider routeRANK's service as highly relevant to the issue of integrated ticketing for air and rail transport and would welcome the opportunity to take part in the discussions focused on this initiative.

Yours sincerely,

Jeffrey S. Petty  
CEO

Annex: Questionnaire for Public Consultation

### Questionnaire - Public Consultation

#### Development of Integrated Ticketing for Air and Rail Transport

[http://ec.europa.eu/transport/air\\_portal/consultation/2008\\_09\\_30\\_en.htm](http://ec.europa.eu/transport/air_portal/consultation/2008_09_30_en.htm)

#### Scope of air-rail integrated ticketing

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

There is little doubt that these services have potential, globally and across the EU, in both the business and leisure travel markets. The online travel market in the EU, for example, has grown from CHF 15.7 billion in 2004 to CHF 28.0 billion in 2006 and is forecast to grow to CHF 35.1 billion in 2008. (Jupiter Research and Euromonitor International, 2007).

Additionally, travel routes are becoming more complex and there are an ever increasing number of passengers searching for more affordable means of travel other than traditional air providers. We believe that this is where intermodal services can add the most value because travel infrastructure and access to information is highly fragmented at both the national and the international level and competition between various means of travel is high.

##### 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?

Focusing on the linkage between air and rail services at that outset appears to be the most obvious course of action for many commercial and operational reasons but unfortunately, as noted, this will not include most low cost carriers.

Although other modes of public transport should be included in order to enable door-to-door travel planning, the number of transport providers (approximately 300 in Switzerland alone) makes integrated ticketing across multiple forms of transport quite complex. Most existing systems, including the GDSs, are designed for limited station-to-station queries involving a relatively small number of providers and therefore are not equipped to manage the many permutations that would result with the inclusion of public transport.

##### 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 most practical connection, at least in major markets, would be a direct rail link between the air and rail stations. Otherwise, dedicated shuttle services that run between the transport centres on a regular basis would be required in order to facilitate the passenger's connections. These services could be offered by either a commercial operator or as a division of an existing network or local transport authority.

#### 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?

Based upon our experience with the parties being targeted, we believe that most of the transport providers would be interested in participating in such an agreement. However, full transparency of all travel options and searching many travel routes is not in keeping with the existing commercial models of the GDSs and therefore the display of content and commercial terms of the service, as discussed in section 4.5, must be reviewed and updated in order to reflect the spirit of this initiative.

routeRANK has established contact with a wide range of national and international transport providers, including public transport service providers, car route planners, tour operators, and airlines as well as their technology providers. We would welcome the opportunity to participate in this discussion.

## 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?**

A unified system incorporating both the rail and air information would be an ideal scenario however, the existing commercial aspects related to fees paid rail providers, booking agents and search engines need to be analyzed in greater detail as the increased amounts of data and travel alternatives supplied by the GDSs may create additional costs for providers.

## Project management

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

An independent party that is not incentivized commercially to promote or position any particular travel means and will objectively consider the needs of the all stakeholders targeted by this initiative.

## 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.**

Distribution of the product would, at this point, appear to be one of the main potential problems.

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

Airline restrictions and charges related to luggage and increased security measures, particularly at airports, has forced travellers to reconsider their need for luggage that is not considered hand carry. Although not the most convenient, logistically it would be easiest for the traveller to be responsible for their luggage throughout their intermodal journey as is the current case when a person transfers from a flag carrier to a low cost carrier or from most air/rail services to a connecting rail/air service.

## 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 underlying assumption regarding integrated ticketing appears to be that the consumer, given the option to view air, rail and combined travel alternatives, will opt for multi-modal itineraries based upon a purchase decision driven by price, time and schedule. However, these traditional criterion do not account for many other factors that impact travel planning. Providing additional information concerning the CO2 emissions of each form of transport, the probability of delays on routes, and other metrics not currently made available to travellers would provide a more complete picture of the potential travel options. Thus, travellers would be able to compare criteria that they judge to be more important and more relevant in the current travel market.