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Réf

Consultation Paper: Revision of the Community Legislation on the Access to the Road Transport Market and on the Admission to the Occupation of Road Transport Operators

Linja-autoliitto – Finnish Bus and Coach Association – represents 370 bus and coach operators in Finland. The bus transport system in Finland is dominated by small and medium sized private enterprises. The answers of Linja-autoliitto (LAL) are as follows:

PART A

Question 1

LAL supports option 3, because the goods and passengers transport sectors are so different.

Question 2

Local services should be excluded from the regulation 684/92.

Question 3

Higher qualitative requirements should be imposed on all passenger transport operators in order to guarantee the high quality of services and the image of the sector.

Question 4

At least it should be made possible for the Member States to verify whether the operator still satisfies the conditions for maintaining the licence at shorter intervals on a regular basis.

Question 5

5 years validity should be maintained or even increased if possible, because the investments to for instance vehicles are on longer basis than 5 years.

Question 6

The harmonisation of the certified copies is absolutely necessary in order to help the controlling.

Questions 7, 8, 9

No answer

Question 10

The control documents should absolutely be harmonized in order to avoid confusion during an inspection.

Question 11

No answer

Question 12

The authorisation regime for international regular passenger services should be maintained.

Question 13

LAL supports the current authorisation processing periods.

Question 14

Because we don't have any experience about this, it is very difficult to answer the question.

Question 15

If the operator does not start the international service (within 6 months after getting the authorisation?), the authorisation should be cancelled.

Question 16

Urban and suburban cabotage operations in the course of international services should not be authorized.

Questions 17, 18, 19, 20, 21

No answer.

PART B

Question 1

See answer 1 in part A.

Question 2

The current criteria are enough.

Question 3

No proposals.

Question 4

See answer 4 in part A.

Question 5

Yes. Automatic and systematic notification would be the best solution.

Question 6

No answer.

Question 7

Yes.

Question 8

Yes.

Question 9

No. The person who is effectively and permanently in charge of an undertaking is enough.

Question 10

Yes. See also answer 5.

Question 11

No.

Question 12

Yes. The thresholds should be higher, but this should not slow down an undertaking's investment or growth capacity.

Question 13

No, because it would mean that small companies disappear from the market.

Question 14

Harmonisation is necessary. It is absolutely necessary to maintain the dispensation which allows to compensate courses by professional experience.

Question 15

Yes.

Question 16

It is very important to find good tools for evaluating professional skills, suitability etc. of persons who are interested to offer passenger transport services. This would be one way to guarantee the high quality of services and the whole image of the sector.

Question 17

No.

Best regards

LINJA-AUTOLIITTO

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