

## **Questionnaire Passenger Rights on International Services Answers from Eurolines Organisation**

**Question 1:** We do agree that equal treatment should be ensured between bus and coach operators in different Member States in terms of protection of passenger's rights. This equal treatment should also be ensured between the operators from the EU and those from non-EU countries driving inside the EU.

Equal treatment also means to put the coach and bus sector on the same level as other modes of transport. Indeed, these are granted a certain favourite status when talking of taxation and the way police and border controls are organised.

**Question 2:** To reach an equal treatment and to include the operators from outside the EU, only the EU can be the appropriate level for the introduction of such rules.

**Question 3:** If Coach services are regulated then both International and Domestic and both scheduled and occasional services.

**Question 4:** Intermodality with other modes of transport is only reasonable with domestic transport.

**Question 5:** There is a considerable difference in the level of insurance between the Eastern and Western European countries. For companies operating international lines this can create legal problems when their clients are victim of an accident in a third country. These clients have bought a ticket in one country (which is a contract between transporter and client) but the insurance can be the one of another country when the line is operationally run by a partner from a third country. Putting the level on equal level would avoid this kind of problems.

**Question 6:** We agree that in principle, there should be a similar scheme to other modes, but it must take into account the specific operational circumstances of International coach services.

**Question 7:** 100.000€

**Question 8:** We believe current legislation is sufficient to deal with this matter

**Question 9:** The introduction of upper limits has the advantage that once the level reached nothing can go upon that.

**Question 10:** If a EU rule is imposed having everywhere the same level of insurance and limits, this problem is obsolete. In case this is not realised it seems logic to have the law of the country where the ticket is bought as applicable because the contract (the ticket) is established there.

**Question 11:** Yes because all passengers who lost luggage had enormous expensive suitcases or bags and always take valuables and expensive cloths with them. Just to avoid this limits are welcome.

**Question 12:** Mobility equipment can be regarded as being part of the luggage the passengers takes with him and as such is within the insurance for damaged luggage. The provisions for mobility equipment lost or damaged should be no different from that of any other item of personal property.

**Question 13:** *To be left open as Organisation*

**Question 14:** This issue we feel is an unlikely scenario in the case of coach transportation. In practice, the only time there would be a denial of boarding would be where the passenger posed a risk to security or safety of the other passengers or the driver. The level of compensation in this case, has to be a percentage of the price paid for the original ticket.

**Question 15:** Yes, we agree that every assistance should be afforded to passengers where delays occur that are the clear responsibility of the operator. Where there will be difficulties is where the delays are not due to the operator- border controls, ferry disruption, road closures etc, and the limit to which the operator can be expected to foot the bill. In most instances, these delays cannot be foreseen or accounted for.

**Question 16:** A compensation in case of delays is a positive signal to the customers. But only delays for which the operator can be held responsible. This excludes weather conditions, reasons beyond control as roads being blocked by accidents, delay caused by any form of control during the journey (border, technical, police).

**Question 17:** For this a compensation grid can be developed consisting in a gradual reimbursement of the ticket via a voucher to be used for future ticket purchase.

**Question 18:** The announcement of delays is a first service to the passengers. The reasons for exempting are certainly elements beyond proper control: weather conditions, accidents blocking roads, strikes blocking roads, controls at borders or on the road for different reason.

**Question 19:** In limited extend, yes. But always be aware that regular International lines do not have assistance on board. The driver cannot take care of the disabled people when they want to go to the toilet or helping them in and out when there are refreshment stops.

**Question 20:** Their assistance can be helping of staff at the check in and the boarding. They should be able themselves to go to toilet and get off in emergency situations.

**Question 21:** On Regular International lines the operators could only be forced to take foldable wheel chairs. They have limited space for luggage and it is impossible to equip their coaches with special gear for boarding big self propulsing chairs.

**Question 22:** Does not apply to us.

**Question 23:** It is obvious that when people are travelling with small children they resume full responsibility. The operator cannot be obliged in offering special facilities for children.

**Question 24:** Passengers with reduced mobility should make reservations at least 24 hours in advance in order to be prepared on their travel.

**Question 25:** Not necessarily.

**Question 26:** Coach terminals very often belong to other bodies as cities. According to their possibilities special levels could be built.

**Question 27:** They can help provided the cost of changes is also taken into account and are economically defensible.

**Question 28:** We agree that there should be quality standards for international services, but that this should be left to operators to establish and monitor them appropriately. These standards however, could be made public.

**Question 29:** The compliance could be monitored by having an annual check of the coaches and other elements that are part of the quality standards. Operators could also be obliged to keep a file of all complaints received and their handling. Study of these can also give a general view of the quality offered.

**Question 30:** The given list could be completed with: information given to the passengers especially in case of delays, but it would be essential to consider carefully how the measure would work in practice.

**Question 31:** The standard conditions of carriage.

**Question 32:** Printed on the back of the ticket.

**Question 33:** They can be made public on the website, in brochures, timetables, on posters or separate leaflets in the sales offices and on the back of the tickets.

**Question 34:** Via the general way of informing the passengers.

**Question 35:** Does not apply for the Organisation.

**Question 36:** The EU should only force every operator to install a central contact point for complaint handling.

**Question 37:** Complaints about international services should be handled at the sales point. As the ticket is seen as contract with the client (cfr. Insurances) it should also imply that the complaint handling is the responsibility of the ticket issuer.

**Question 38:** 4 weeks seems a reasonable limit for handling complaints.

**Question 39:** This can be part of the complaint rules.

**Question 40:** We think this would be impractical and there is always the risk that the statistics do not provide the full facts. Official bodies, however might get access to these figures.

**Question 41:** This should be the competence of member states through their own established consumer protection legislation..

**Question 42:** No.

**Question 43:** *To be left open as Organisation.*

**Question 44:** Left open.

**Question 45:** The creation of a national complaint handling authority which has to be addressed in case the complaint is not dealt with within the given time frame or in case the complainant is not satisfied. The authority has to act as mediator. Only when this level is used and no agreement can be reached courts can intervene.

**Question 46:** *To be left open as Organisation.*

**Question 47:** The Commission can encourage self regulation by supporting existing best practice.

**Question 48:** Self regulation is always stronger than the enforcement of it. Control if self regulation is applied can be installed at community level via the consumer organisations.

**Question 49:** Coach services can only be included in integrated ticketing when talking about domestic services. There the possibility of going from bus to tram and metro or train exists. International services encounter too much elements beyond control (traffic jams, roads blocked for different reasons, controls, etc.) that sometimes make it impossible to respect the time schedules. For integrated modes of transport a reliable respect of the timing is essential.