

DACA Mariusz (TREN)

From: Andrew Jeffreys [jeffreysa@arriva.co.uk]
Sent: vendredi 14 octobre 2005 17:34
To: DACA Mariusz (TREN)
Subject: Commission Staff Working Paper: Rights of passengers in international bus and coach transport

Dear Sir,

I refer to the letter dated 25 July 2005 from the Director-General for Energy and Transport to Steve Clayton, President of the UK Confederation for Passenger Transport, inviting comments on the Commission's consultation document (attached to the letter) on extending passenger protection measures to all modes of transport, and specifically bus and coach transport. This response is submitted on behalf of Steve Clayton in his capacity as Group Managing Director, Corporate Affairs of Arriva plc.

In commenting on this consultation, we are aware of the separate response made by the UK Confederation of Passenger Transport, which follows the format of the questionnaire included with the consultation document, and the more generic responses by the UITP's European Union Committee and the International Road Transport Union. Arriva endorses the points made in all these submissions. We accept in principle the desirability of establishing an EU-wide level playing field to protect passengers' rights for consistency of operation and transparency of treatment across relevant modes.

However, it should be borne in mind that where existing frameworks have been developed for dealing with issues of passengers' rights in one mode or transport sector, these may not be fully applicable in, or responsive to, the characteristics of other sectors. In respect of international coach and bus services, we would suggest that any proposal to harmonise passenger rights should take account of:

- * the key functions of the two types of transport services carried out by this sector; and
- * how and to what extent the fundamental objectives of the proposal are or will be covered by existing legislation, initiatives and activities within and across Member States at both institutional and operational levels.

In this way, it will be possible for the Commission to better identify where common progress is being made or can be expected, where such progress is not likely to be made, and any relevant reasons for this. We believe this in turn will enable proposals to focus more precisely on issues of need and practicality in promoting measures that will meaningfully enhance passenger rights without imposing unreasonable obligations and burdens on operators.

Yours faithfully,

Andrew Jeffreys

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