

# **IRG-rail**

Independent  
Regulators' Group - Rail



**Task force on Multimodality in transport**

**A survey on Mobility as a Service (MaaS)**

**April 2022**

## I. Introduction

### **Mobility as a Service, integrated ticketing and through-ticketing. A framework.**

The work program 2022 has mandated the task force on Multimodality in Transport to produce an internal document on Mobility as a Service (“MaaS”): a new concept of mobility referring to the integration of multiple transport services in a single mobility service.

In general, MaaS provides a digital gateway to different mobility and transport services, e.g., planning, booking and payment for any journey and transport mode (public transport, bus, tram, metro, railway, taxi, car sharing, bike sharing, moto sharing, e-scooter sharing, on-demand public transport, ride-hailing, ride-sharing, long-haul bus, park & ride, car rental, etc.). Most frequently, MaaS integrates land transport services; in some cases, however, integration occurs between land (rail or road) and air or sea transport services; in others, still, MaaS could also integrate services other than transport services (accommodation, culture, etc.).

Several benefits are associated with the operation of MaaS services, including:

- easier and better-informed interaction between the users and the transport network/system;
- emphasis on the entire trip, rather than on just a single segment
- user-tailored services;
- reshaping low-demand services and associated costs;
- as a result of data availability, improvement of monitoring, management, quality and planning of mobility services (by reducing congestion, overcrowding and travel time for commuters);
- promoting a more interoperable and integrated transport system.

On the other hand, obstacles to an effective deployment of MaaS may include:

- institutional fragmentation, with different authorities in charge of different mobility services which often also operate at different levels of government;
- operation of different regulatory frameworks (including on passengers’ rights) for diverse transport modes which may lead to a lack of coordination;
- adverse incentives for players in the supply chain to provide services to each other to protect their competitive position.

Digitalisation of service management is another characteristic of MaaS. In a MaaS, services are most often offered through a platform with several features and a single payment system that is able to provide suitable solutions to address different mobility needs. Hence *MaaS services*, that integrate different transport modalities and other services, *integrated ticketing*, which can be viewed as a MaaS component, and *through-ticketing*, that does not necessarily operate through a platform and does not imply multimodal transport, all remain relevant to our investigation, beside any underlying differences.

In addition to the provisions of art. 13a of Directive 2016/2370/EU, that was examined in a 2021 IRG-Rail paper, recent EU legislation on rail passenger rights and obligations (Regulation (EU) 2021/782- the Regulation) will enter into force on 7 June 2023. Art. 12 of the Regulation provides that “*Where long-distance or regional rail passenger services are operated by a sole railway undertaking, that undertaking shall offer a through-ticket for those services. For other rail passenger services, railway undertakings shall make all reasonable efforts to offer through-tickets and shall cooperate to that end among themselves*”. It could be argued that, since MaaS platforms operate different modes of transport, the above legislation may present regulatory challenges beyond the specific area of rail passengers’ rights.

Furthermore, MaaS involves a mix of public and private players. In this regard, some players might take advantage of their position as data collectors by using AI algorithms that could promote given services. A regulatory framework may, therefore, be needed to ensure fair operation of MaaS.

Drawing on the above, between March and May 2022, the task force on Multimodality has developed this survey presented at the Network Meeting and at the Plenary Assembly as work in progress. Based on the outcome of the survey, the task force will draft a short internal paper (June-September 2022) to be presented at the autumn Plenary Assembly.

## II. SURVEY

Contact details	
Country	
Regulatory Body	
Contact & e-mail	

### A. Introductory

#### 1 – Which modes of transport fall under the remit of your regulatory body?

Please edit the table in Annex 1 as appropriate.

#### 2 – Is your RB competent for digital economy and/or related markets within the transport/mobility system?

Yes     No

Please provide details.

[Click or tap here to enter text.](#)

#### 3 – Is your regulatory body competent for passenger and/or consumer rights issues in the rail or other transport modes?

Yes     No

Please provide details.

[Click or tap here to enter text.](#)

### B. Preliminary on MaaS

#### 4 – Is the description of MaaS provided in the introduction applicable in your country?<sup>1</sup>

Yes     No

If your answer is “no”, please explain.<sup>2</sup> [Click or tap here to enter text.](#)

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<sup>1</sup> For the purpose of this exercise, platforms such as Trainline or Rome2Rio are referred to as digital platforms, but not as MaaS, insofar as they do not integrate mobility modes, but only provide for ticket sale, even though for multiple transport modes. Digital platforms are not MaaS if each service provider remains solely responsible for its own part of the journey.

<sup>2</sup> For reference and common information, some definitions of MaaS are provided in the websites listed in Annex 2.

## 5 – Are MaaS services offered in your country (or parts/regions/areas thereof)?

Please illustrate.

*If no MaaS services are offered in your country, please skip to Section E.*

[Click or tap here to enter text.](#)

## 6 – Which type of services are included in the MaaS?

- Integrated ticketing reservation  Yes  No
- Payment  Yes  No
- Other (please illustrate) [Click or tap here to enter text.](#)

## 7 – Which modes of transport are included in those service(s)?

- Rail  Yes  No
- Bus/coach  Yes  No
- Metro  Yes  No
- Inland navigation<sup>3</sup>  Yes  No
- Maritime transport  Yes  No
- Air transport  Yes  No
- Other<sup>4</sup> (please specify) [Click or tap here to enter text.](#)

Please provide details.

[Click or tap here to enter text.](#)

## 8 – Which of the following rail services is most frequently part of a MaaS scheme in your country?

- Urban/suburban services  Yes  No
- Regional/national  Yes  No
- International  Yes  No

Please comment.

[Click or tap here to enter text.](#)

## C. Management

<sup>3</sup> In accordance with Article 3 (i) of Regulation (EU) No 1177/2010 of the European Parliament and of the Council of 24 November 2010 concerning the rights of passengers when travelling by sea and inland waterway and amending Regulation (EC) No 2006/2004, "inland waterway means a natural or artificial navigable inland body of water, or system of interconnected bodies of water, used for transport, such as lakes, rivers or canals or any combination of these".

<sup>4</sup> 'Other' includes e.g., car sharing systems, bike- and e-scooter sharing systems.

**9 – Who is/are the manager(s) of MaaS services in your country? (e.g., a public entity? a private entity? Please answer with reference to each MaaS concerned)**

Please provide details.

[Click or tap here to enter text.](#)

**10 – What is the role of the MaaS manager? (set rules of operation? obtain payment? other?)**

Please provide details.

[Click or tap here to enter text.](#)

**11 – Do you consider that central or local government(s) should play a role in the development of MaaS services? If so, which?**

Please illustrate.

[Click or tap here to enter text.](#)

**12 – Do you think that MaaS services raise regulatory issues? Which?**

Please comment.

[Click or tap here to enter text.](#)

#### **D. Impact on the market**

**13 – Which advantages, drawbacks, opportunities, and risks do you associate with MaaS services?**

Please illustrate.

[Click or tap here to enter text.](#)

**14 – What, in your view, is the effect of MaaS services on demand for rail passenger services?**

Please comment.

[Click or tap here to enter text.](#)

**15 – Should a PSO service be part of a MaaS? Which specific concerns should be addressed? E.g., service/operators with separate accounts, others.**

Please indicate and explain by order of priority/importance.

[Click or tap here to enter text.](#)

**16 – Have you come across issues of competition, discrimination and/or unequal access to MaaS by transport or other operators?**

Please illustrate.

[Click or tap here to enter text.](#)

**17 - How is the value of a MaaS service determined (based on the sum of the ticket prices for each transport mode or other)? How is the revenue allocated (allocation percentage) among transport service operators? Are the prices of the different components and that of the MaaS service exposed?**

Please comment

[Click or tap here to enter text.](#)

**18 - Who is held responsible, towards users, for inefficiencies relating to a transport service? The individual operators or the MaaS manager? How are complaints handled?**

Please comment

[Click or tap here to enter text.](#)

**19 – In your opinion, how important is it that MaaS guarantees accessibility of transport data by transport operators?**

Please comment.

[Click or tap here to enter text.](#)

**E. Regulation**

**20 – Has the rail regulator in your country been granted *ad-hoc* competences to oversee the creation and implementation of MaaS services including rail passenger services?**

Please comment.

[Click or tap here to enter text.](#)

**21 – Do you consider it necessary to adopt *ad hoc* EU and/or domestic legislation to implement the creation of MaaS services comprising rail services?**

Please comment.

[Click or tap here to enter text.](#)

**22 – Do you consider existing EU or domestic legislation adequate to protect passengers' rights (in particular, the rights of passengers with disabilities or with reduced mobility) using multiple modes of transport and/or MaaS services?**

Please comment.

[Click or tap here to enter text.](#)

## **F. Mobility platforms other than Maas**

**23 – Are there digital platforms, other than MaaS, that intermediate mobility services in your country?**

Please illustrate.

[Click or tap here to enter text.](#)

**24 – Which transport modes are included in those services?**

- Rail  Yes  No
- Bus/coach  Yes  No
- Taxi  Yes  No
- Metro  Yes  No
- Inland navigation  Yes  No
- Maritime transport  Yes  No
- Air transport  Yes  No
- Other (please specify) [Click or tap here to enter text.](#)

**25 – Which type of services do these platforms offer?**



- Ticket reservation  Yes  No
- Integrated ticketing reservation  Yes  No
- Other (please specify) [Click or tap here to enter text.](#)

**26 – Does the operation of these platforms raise regulatory issues?**

Yes  No

If your answer is “yes”, please illustrate.

[Click or tap here to enter text.](#)

### G. Through-ticketing

**27 – Is the legal framework in your country ready to apply art. 12 of Regulation (EU) 2021/782?**

Please comment.

[Click or tap here to enter text.](#)

**28 – Do you foresee difficulties in implementing through-ticketing according to art. 12 of Regulation (EU) 2021/782 in case of more than one railway company being in operation?**

Please comment.

[Click or tap here to enter text.](#)

**29 – If you have already experienced difficulties, how did you address them?**

Please illustrate.

[Click or tap here to enter text.](#)

### H. Other issues

**30 – Do you consider it relevant that IRG-Rail takes a position on the issues above? Are there other issues related to multimodality on which a position of IRG-Rail would be more relevant?**

Please comment.

[Click or tap here to enter text.](#)