

Open letter to EVP Timmermans

Multimodal Digital Mobility Services – Friends of MDMS call for ambition, halfway measures are unacceptable

Brussels, 7 June 2023

Dear Executive Vice-President Timmermans,

As representatives of a significant part of Europe's mobility ecosystem, including consumers and passengers, environmental groups, independent rail operators and ticket intermediaries, we are writing to you regarding the upcoming Regulation on Multimodal Digital Mobility Services (MDMS).

To support the European Green Deal ambitions, the MDMS Regulation must enable convenient combination and booking of transport options. Since the inception of this Regulation, we have advocated for the EU to **ease the booking of (multimodal) transport journeys involving different transport offers across all modes and operators into a single booking**. This initiative is a crucial piece of the transition towards a more sustainable mobility system and has the potential to play an important role in encouraging the much-needed shift to rail.

However, we now understand that **the Commission is considering downgrading the ambition of its proposal by discarding this central aim** of the initiative. Therefore, we call on you to **ensure** that the Commission keeps a high level of **ambition for this Regulation. The interests of European travellers and reaching the EU climate goals must remain at the heart of the initiative.**

If the MDMS Regulation were to only focus on giving passengers access to ticketing data and then “re-linking” to transport operators' websites, it will have failed in its fundamental objectives of making consumers lives easier, facilitating new services and reducing GHG emissions through a modal shift towards more sustainable transport. **Solely redirecting customers to several different portals of different operators is an insufficient solution with low added-value**, alarmingly close to the Status Quo which is unanimously considered as unsatisfying. This approach would mean that the **anti-competitive practices of dominant operators which prevent integrated booking** via independent distribution channels, aiming at limiting comparison and combination across operators and modes, will not be addressed. This is despite the pile of ongoing ticketing cases against state-owned incumbents , which grows larger by the month¹²³⁴ and such an approach would do little to alleviate the grip that the incumbents currently have on the way we can search, book and combine our travel in Europe.

European business, leisure passengers and citizens want the ability to combine and book all types of offers (including train, plane and coach) in a hassle-free manner. With the goal of enticing passengers towards more sustainable travel in mind, the EU should **unleash the potential of MDMS** as modal shift and competition enablers by obliging booking/ticketing through third-party channels based on fair, reasonable and non-discriminatory conditions.

Mr. Executive Vice-President, we count on your support.

¹ European Commission: [Commission opens investigation into possible anticompetitive practices by Renfe in online rail ticketing](#), April 2023

² Bundeskartellamt: [Bundeskartellamt issues statement of objections against Deutsche Bahn due to possible hindrance of mobility platforms](#), April 2022

³ Autorité de la Concurrence: [Unannounced inspections carried out in passenger rail transport, travel agency services and products distribution, and digital mobility systems sectors, May 2023](#)

⁴ Mlex: [Finnair's commitments to end Swedish antitrust probe get pushback from travel agents](#), May 2023

Signatories



ALLRAIL

Alliance of Passenger Rail New Entrants



BEUC

The European Consumer Organisation



BT4Europe

European Network of Business Travel Association



ECTAA

European Travel Agents' and Tour Operators' Association



EPF

European Passengers' Federation

eu travel tech

eu travel tech



Europe on Rail

Civil Society for Rail Renaissance



GBTA

Global Business Travel Association

MOFAIR

Bündnis für fairen Wettbewerb im Schienenpersonenverkehr

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German Alliance for fair competition in passenger rail transport



Transport & Environment