

## eu travel tech position paper – Multimodal Travel Information Systems

Data is at the heart of the services that travel technology companies provide to consumers and businesses. Through the sharing of data between transport operators and digital mobility providers, travelers can be empowered to easily find the right travel options and can be kept fully informed of their journeys at all times.

As attaining the right data in a useable format and within the correct timeframe from the relevant transport operators is not always possible through purely commercial or voluntary approaches, the Delegated Regulation on Multimodal Travel Information Systems (MMTIS) provides a **valuable tool for digital travel providers to access such data**. As with other legislative frameworks related to data, the practical impact and added-value of the MMTIS Delegated Regulation depends in large part on its (national) **implementation and enforcement**, particularly the design and resources invested into the National Access Points (NAPs).

### Views on the proposed MMTIS revision

#### Expansion of scope

**eu travel tech fully supports the expansion of the scope of the MMTIS Delegated Regulation to dynamic travel data**, as foreseen in Article 5. While the original scope with a focus on static data was a useful starting point for the MMTIS Delegated Regulation in 2017, we are convinced that the most relevant data for digital travel providers and consumers alike are dynamic.

Dynamic data is particularly important to ensure that travelers can be fully informed before and during their journey regarding disruptions, delays, cancellations and other relevant data such as dynamic platform information. As such, the data under point 2.1 of the Annex is of particular importance. The availability of such data through NAPs can increase the level of service offered by digital mobility providers such as journey planners and even booking tools, while also easing traveler's access to it.

Regarding the scope of dynamic data, we further highlight that the **occupancy information under point 2.3 plays an important role**. Vehicle occupancy data can be a decisive factor for travelers, particularly in the stage of journey planning. As could be observed during the COVID-19 pandemic, occupancy data may be highly relevant, but not available to all players distributing information about travel options, thus limiting travelers' visibility on this information. Therefore, we **call for occupancy data to be shared via NAPs** alongside all other dynamic data listed in the Annex. Such information should be made widely available to travelers via all means, we see no reason to carve it out of the obligations under Art. 5 (1).

#### Alignment with other legislative frameworks

While we fully support a more ambitious MMTIS Delegated Regulation, we highlight that this legislative framework will not guarantee that travelers are able to easily book and purchase all relevant tickets. This has been rightly recognized by the European

Commission, which is why the **Regulation on Multimodal Digital Mobility Services (MDMS)** is being developed to tackle commercial issues in ticket distribution, ensuring that travelers are able to book all options on independent digital mobility providers and are not punished for comparison shopping. In our view, the revised MMTIS Delegated Regulation must consider its **strong link to the upcoming Regulation on Multimodal Digital Mobility Services**.

As such, we caution legislators to **refrain from introducing any prescriptive obligations or restrictions regarding the display and ranking of travel options** in the MMTIS Delegated Regulation. Multimodal Travel Information Services themselves will be fully captured by the scope of the MDMS Regulation, which will comprehensively regulate how these digital players can structure their display and ranking of travel options. We are thus concerned that the current wording of the draft MMTIS Delegated Regulation would limit how the MDMS Regulation is able to approach the regulation of these practices.

Substantively, we further criticize that ranking of travel options is likely to always be based to a certain extent on the “end user identity”, often end users specifically select such ranking criteria themselves.

**Regarding compensation, we similarly caution against an overly prescriptive approach**, in light of the comprehensive FRAND framework which will be introduced under the MDMS Regulation. While we agree that compensation should certainly not exceed the purely technical costs associated with disseminating data, we highlight that the wording of the MMTIS Regulation should not limit the design of the MDMS, which will affect any Multimodal Travel Information Systems directly. A conflict of obligations must be avoided.

### **About eu travel tech**

eu travel tech represents the interests of travel technology companies. eu travel tech uses its position at the centre of the travel and tourism sector to promote a consumer-driven, innovative and competitive industry that is transparent and sustainable. Our membership spans Global Distribution Systems (GDSs), Online Travel Agencies (OTA), Travel Management Companies in business travel (TMCs) and metasearch sites.

Our members include Amadeus, Booking.com, eDreams ODIGEO, Expedia Group, Travelport, and Skyscanner. Associate members include American Express GBT, etravelli, LastMinute, Trainline and TripAdvisor. Strategic Partners include GetYourGuide.