

# European Parliament

2019-2024



Brussels, 26/06/2023

Dear President of the Commission von der Leyen,  
Dear Vice-President of the Commission Timmermans,  
Dear Vice-President of the Commission Vestager,  
Dear Commissioner Vălean,

We are turning to you to express our deep concerns regarding the legislative proposal on Multimodal Digital Mobility Services, originally announced to be adopted in the Work Programme 2022 with the goal of **boosting digital solutions and supporting integrated and sustainable mobility**.

We strongly believe that the proposal is a unique chance and can have a strong positive impact on the economy, society and environment. **A strong proposal with FRAND (fair, reasonable and non-discriminatory) principles for access to the integrated sales channels of the incumbent companies** is a key enabler to delivering the Green Deal, in particular with a view to cross-border connections.

We are particularly concerned as the adoption date continues to be postponed and by the current **policy options considered by the European Commission that puts consumer choice, decarbonisation of the mobility sector and the much-needed liberalisation of online ticketing at risk**. We believe that the **liberalisation of online booking and ticketing is needed**, to ensure that multimodal transport keeps pace with innovation and to make sustainable mobility solutions more attractive for citizens. Moreover, there is a need to ensure **FRAND for data access and viable remuneration for investing and innovation**.

We call up the European Commission to come up with an ambitious proposal that empowers **consumers' choices and their ability to compare fares and tackles anti-competitive practices of dominant actors** that prevent integrated booking. This is even more urgent as anti-competitive behaviour in the field of data access and ticketing is being increasingly identified by competition authorities across EU.

Thereby, seamless multimodal passenger transport and increasing the offer of sustainable long-distance travel options will be achieved and it will therefore **reduce dependency on emission-intense travel options**. Moreover, it can **empower the consumer** by increasing choice, transparency and ease of booking tickets. A strong proposal enables innovation for the benefit of rail travellers all over Europe, giving them the possibility to book cross-border multicarrier and multimodal travelling with one reservation process. In order to achieve this, independent distributors need the ability to be able **to effectively compete with railway incumbents' own sales**

**channels by accessing and selling all rail tickets** (single carrier or multi-carrier) on FRAND terms.

Besides, strengthening independent distributors will promote the development of distribution on rail as railway operators will have distributors to promote their market entries. We are determined to work to improve the proposal significantly in case the current weaknesses are not addressed.

We therefore call on the European Commission to live up to the ambitions and commitments already enshrined in the 2022 work programme. When selecting the policy option, the Commission should use the opportunity for an ambitious proposal along the lines outlined in this letter.

Yours sincerely,  
Members of the European Parliament:

Jan-Christoph Oetjen (Renew Europe, Germany)  
Jakop Dalunde, (Greens, Ireland)  
Josianne Cutajar, (S&D, Malta)  
Jens Gieseke (EPP, Germany)  
Nicola Beer (Renew Europe, Germany)  
Moritz Körner (Renew Europe, Germany)  
Anna Donath (Renew Europe, Hungary)  
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Karen Melchior (Renew Europe, Denmark)  
Caroline Nagtegaal (Renew Europe, Netherlands)  
Ondrej Kovařík (Renew Europe, Czech Republic)  
Vlad Gheorghe (Renew Europe, Romania)  
Pierre Karleskind (Renew Europe, France)  
Dominique Riquet (Renew Europe, France)  
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