



Paris, 14 September 2023

To:
Ms Adina Vălean, European Commissioner for Transport

Open letter: Large risk of fragmentation in metropolitan public transport services with improper MDMS regulation

Dear Ms Vălean,

As Europe's largest public transport authorities (PTAs), we have followed the work and ambitions of the Commission to introduce frameworks guiding the collaboration of transport service providers and third-party customer-facing sales and information services (MDMS). As strong supporter of the European Green Deal, EMTA has been pro-actively engaging in the development of this regulatory initiative for several years now and seeks to continue doing so with this letter of concern.

We understand that addressing some of the prevailing obscurity in Europe's railway market has become an additional focus for the MDMS regulation in recent months. EMTA and our members, the PTAs throughout Europe also seek to establish more transparency, efficiency and oversight in the production of local and regional railway services to benefit our citizens and metropolitan areas. These services play a vital role in the integrated metropolitan public transport systems.

We are greatly concerned with the approach currently put forward by the Commission. Determining whether a transport service is in scope of specific rules based only on the type of infrastructure used to produce the service is a far too rough mode of differentiation and it neglects the very nature of public transport as a composite service market where it is necessary to provide seamless travels for citizens between busses, trams, local and regional trains and metros. The draft regulation may seem very useful for purposes in the long-distance transport market. But if applied to all services on heavy rail infrastructure regardless of the type of service, it risks disintegrating public transport systems and does not address any need of Europe's citizens or the public transport sector itself.

It is very important that an upcoming regulation apply workable definitions that consider the significant differences between long-distance services, which serve occasional and often more exclusive transport demands, and metropolitan services that serve daily mobility needs with various purposes.

As Europe's largest PTAs, we are neither transport operators nor MDMS providers. But we are involved in both of these markets due to our democratic mandate to work on comprehensive services, timetable coordination, fare integration and effective contracting with the goal to integrate all modes of public transport significant to the mobility needs in our regions into seamless

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metropolitan public transport systems. Our integrated systems focus on the specific needs of citizens in functional urban areas and their surrounding regions. Our integrated systems provide consistent and reliable access to everyday activities in an environmentally friendly, equitable and efficient manner. Our integrated systems serve as non-discriminatory feeder services to any type of long-distance transport. Our integrated metropolitan public transport systems are a tool that serve a multitude of objectives of the Commission.

The MDMS regulation should therefore strengthen the ability of PTAs to integrate metropolitan public transport systems and not risk fragmentation of services through improper focus, definition of rules or the overall neglect of the fact that, in Europe, most public transport is organised by public transport authorities serving their metropolitan areas.

As Europe's largest PTAs, we urge your Commission to collaborate with Europe's transport authorities and use our increasingly integrated metropolitan public transport systems as a basis for a nuanced regulatory approach that prevents the negative impacts of disintegration and ensures the regulation achieves its priority objectives: enabling digital services that create real value for citizens and visitors. We remain committed to modal shift toward public transport for a more liveable, equitable and prosperous Europe that achieves its climate goals. We remain at your disposal.

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