

Position paper

Prise de Position – Stellungnahme

DECEMBER 11

REMARKS ON THE IMPLEMENTATION OF TAP TSI¹

The UITP European Union Committee (EUC- the body which speaks on behalf of public transport undertakings in the EU) supports all initiatives that bring economic and other benefits desired by customers and operators, which will encourage more people to use public transport, rail operators to invest in public transport and support the development of the European Rail Markets.

The UITP EUC believes that TAP TSI² can have the potential to do this if properly designed and managed.

The UITP EUC has been following the progress and developments of the TAP TSI Phase One project and has read with great interest the Intermediate Project Report of 8 December.

Several general points dealt with in TAP TSI Phase One need a critical review, especially with regard to scope, commercial impacts, and the fit with existing and developing local and regional solutions.

Scope

Throughout the project and between the stakeholders and the European Commission (EC) and European Rail Agency (ERA) there seems to be a difference in understanding which rail services are in scope and which are not. UITP EUC has raised this previously through the Steering Committee.

The scope of the TAP TSI is the trans-European rail system including the conventional lines and high-speed lines identified in Decision No 1692/96/EC, and not the "entire rail system" as defined in Article 1(4) of the Interoperability Directive 2008/57/EC.

At the same time the ERA report on the limits of scope of the TSI and Urban Transport³ allows for local rail systems to be exempted from TAP TSI, when they are fully excluded by a Member State from the Interoperability directive (e.g. tram, light rail and metros) and for local systems which partly are out of scope when some sections (stations) of the Community Rail System are identified as such by a decision of a Member State. The scope of TAP TSI does not mention the possibilities of exemptions opened by the Rail

¹ Telematics Applications for Passenger Services Technical Specifications for Interoperability

² TAP TSI are developed under Interoperability Directive 2008/57/EC

³ <http://www.era.europa.eu/Document-Register/Pages/Report-Study-on-the-limit-between-the-scope-of-the-TSIs-and-urban-transport.aspx>

Passenger Rights Regulation (EC) 2007/1371. This means that the domestic services and the suburban and regional rail services operated on TEN lines might be in scope or not depending on the decisions taken by the member state.

The application of TAP TSI for suburban and regional systems running on TEN networks cannot be made mandatory as it depends also on national decisions. The inclusion of local cross-border services puts existing systems at risk. The discussion on TAP TSI does not yet take into account the existence of functional differences on local and urban systems and integration with other modes.

Potential areas for concern regarding suburban and regional transport passengers

The UITP EUC is determined to avoid a situation where solutions are developed for long-distance travel, equalling 5% of the rail trips, but dictate the solutions for the majority 95% of rail trips made in the EU which are local journeys.

The proposed standardisation of Passenger Information does not reflect and take into account existing locally developed solutions. Most of the urban, suburban and regional passengers in Europe already enjoy specific locally and sometimes nationally integrated information and travel systems adjusted to local circumstances, local needs and local / regional public budgets. The current TAP TSI discussion has not yet addressed the risk of heavy rail data standardisation setting inappropriate standards for other public transport modes as bus, metro, tram.

The TAP TSI approach must take into account the subsidiarity principle where the needs of the 95% of local rail public transport users are at stake and its needs to reflect customer-oriented multimodal integration at a local level.

Risks for public organising authorities

A key concern for urban and suburban areas is that inappropriate data systems standards will have to be applied to local bus, tram and metro services, which could lead to poorer information/ticketing provision from the passenger perspective. Even more significant is the potential cost impact by any requirement to replace or modify existing systems with what may be a less flexible alternative. Customers making local journeys are unlikely to be willing to bear the costs of a new system which does not benefit them for the vast majority of their travel.

The representatives of competent authorities have not yet been involved as stakeholders in project TAP TSI Phase One.

Fit with other EU Initiatives

The UITP EUC would like to stress that the EC needs to ensure a consistent approach to TAP TSI related initiatives such as the Urban ITS program or the Multimodal Journey Planner Initiative or the standardisation mandate M/453-6 October 2009 in the field of information and communication technologies. The TAP TSI project should also take into account existing sector activities such as the Integrated Fare Management (ITSO/Calypso/VDV compliant) smartcard.

Commercial and economic feasibility

UITP EUC does not believe the commercial and economic impact of TAP TSI is yet understood or taken into account in the TAP TSI Phase One.

It is essential for the UITP EUC that commercial aspects and interests are properly protected. Any commercial aspect between different parties must be dealt with on the basis of commercial agreements only. Without a mutually agreed commercial contract there can be no access given to commercial information.

The project team has not yet presented any business case to demonstrate the cost and the benefits brought by TAP TSI. From what UITP EUC has seen so far, TAP TSI implies an additional cost burden to the sector, which would need to be recovered through higher ticket prices or higher subsidies or both.

TAP TSI Phase One addresses clearly the most sensitive subject of ticket sale by third parties. As stated above, any solution to be developed for third party ticket sales must only be done on the basis of commercial agreements. Commercial agreements (and the ability to adjust them over time) must also apply to any proposals on revenue sharing and allocation through a clearing house. These solutions cannot and must not be imposed on the sector.

Any TAP TSI solution must be customer-focused in the areas of ticketing and customer information. It is vital travel and traveller data owned, managed and protected by the operator or competent authority.

The discussed intention to create a centralised information and ticketing data solution including central data storage and access will not find full support for the following reasons:

- Solutions are increasingly 'cloud' based so it runs counter to the trend with a less efficient European centralised solution.
- Any centralised data management would also pose liability risks for owner of the data
- Only member states and competent authorities can allow this data to be public or to be shared

The idea of creating a permanent statutory body cannot be supported for similar reasons as this cuts across the principle of subsidiarity.
