



Position Paper
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Real-time information for high customer services

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Summary

“Appropriate technical means to ensure access to real-time information shall guarantee the highest possible standard of customer service”

In the context of the ongoing 2022 TAP TSI revision package, the Community of European Railway and Infrastructure Companies (CER), the European Rail Infrastructure Managers (EIM), the European Rail Industry (UNIFE), and the European Travel Tech organisation (EUTT), are of the opinion that

- the latest **proposal of the European Union Agency for Railways (ERA) for the revision of the TAP TSI Regulation** to implement Article 10 of Regulation (EU) 2021/782 is not fit for purpose as it **goes against smooth and flexible access to the information promoted by the Regulation to the detriment of the passenger.**
- a **full Impact Assessment should be conducted to demonstrate the affordability of such a proposal.**

Without prejudice to the implementation of operational communications between infrastructure managers and operating railway undertakings which are necessary to operate transport services, **appropriate technical means to ensure access to real-time pre-journey information and information during the journey** in accordance with Article 10 of Regulation (EU) 2021/782 shall take into account the following to **guarantee the highest possible standard of customer service** based on an industry consensus on the solution:

- infrastructure managers the necessary flexibility to offer the most appropriate technical means depending on the requester's needs and expectations,
- ticket vendors, tour operators, and other railway undertakings to access the most complete, accurate and reliable real-time passenger information.

CER/EIM/UNIFE and EUTT recommend to continue the dialogue on real-time information, with the objective of defining the best technical solution. Through such information, distributors shall receive only real-time information which:

- is relevant to take commercial decisions actions, such as the cancellation or the recommendation of a journey.
- can be easily linked with the commercial information shared by distributors with the operating railway undertaking and the end user (e.g. train identification, locations)

In addition, CER/EIM/UNIFE recommend to further specify appropriate technical means to ensure access to real-time pre-journey information and information during the journey **through the conclusion of a contract or other arrangements between concerned stakeholders**, but not through additional specifications in the TAP TSI regulation.

CER/EIM/UNIFE's and EUTT's members' **commitment is to comprehensively implement the framework of telematics applications for passengers when developed in a sound and consistent manner** taking into account sector stakeholders' return of experience in the area of telematics communication related to planning, operation and innovative ticketing and intermodality.

Although, considering the developments brought by the recent outcomes of the TAP TSI Revision on TAP real-time data messages, CER/EIM/UNIFE and EUTT, **call on European Institutions and the Member States to ensure that the 2022 TAP TSI is further shaped for the benefits of passengers, taking into account business-driven, and thus customer-oriented, return of experience from sector stakeholders.**

Background

“Highlight of the 2022 TAP TSI revision – Real-Time Data – remains unsolved from the perspective of CER/EIM/UNIFE and EUTT”

In the framework of the European Union Agency for Railways (ERA) being mandated by the European Commission to develop and maintain the technical specification for interoperability relating to the subsystem ‘telematics applications for passenger services’ (TAP TSI), the Community of European Railway and Infrastructure Companies (CER), the European Rail Infrastructure Managers (EIM), the European Rail Industry (UNIFE), and the European Travel Tech organisation (EUTT), have been continuously offering the Agency the substantial return of experience of their members (the sector stakeholders) on national and European developments and technical developments.

Great achievements were recently achieved in the context of the ongoing 2022 TAP TSI revision package taking into sector-driven inputs as e.g. the OSDM (Open Sales and Distribution Model) specifications, the new Train Combined Model, the CIT’s EU Claim form, and the eTCD (electronic Ticket Control Database).

However, the **highlight of the 2022 TAP TSI revision – Real-Time Data – remains unsolved from the perspective of CER/EIM/UNIFE and EUTT**. In that respect, the prescription to use TAP real-time data messages to implement the rail Passenger Rights Regulation (EU) 2021/782 Article 10 without finding an industry consensus on the solution is of great concern for railway undertakings, infrastructure managers, ticket vendors, and tour operators represented by the TAP stakeholders mentioned above.

State of play

“CER/EIM/UNIFE and EUTT are in the opinion that the latest ERA’s proposal goes against the smooth and flexible access to the information”

Besides the obligations for railway undertakings, tour operators and ticket vendors offering transport contracts on behalf of one or more operating railway undertakings to provide the passenger with “*pre-journey information*” and “*information during the journey*”, the rail Passenger Right Regulation (EU) 2021/782 requires that “*Infrastructure managers shall distribute real-time data relating to the arrival and the departure of trains to railway undertakings, ticket vendors, tour operators and station managers*”.

Also, “*the infrastructure manager and the railway undertaking obliged to make available information [...] may request the conclusion of a contract or other arrangement*”, and “*may require [...] a fair, reasonable and proportionate financial compensation for the costs incurred in providing the access*”.

ERA’s current proposal to amend the TAP TSI Regulation requiring the use of TAP TSI real-time messages for infrastructure managers and railway undertakings to comply with Article 10 of Regulation (EU) 2021/782, proposes twofold and parallel information flows:

- infrastructure managers would be required to distribute Train Running Information, Train Running Forecast, and Train Running Interruption messages, upon one-off request, to all world/EU-wide ticket vendors, tour operators, and railway undertakings selling tickets on their network for all the arrivals /departures of the trains;
- operating railway undertakings would be required to provide ticket vendors, tour operators and other railway undertakings that sell their services with Train Running Information, Train Running Forecast, and Train Running Interruption messages for train disruptions and delays

Train Running Information, Train Running Forecast, and Train Running Interruption messages are current practice between infrastructure managers and railway undertakings. These real-time messages are pure operational messages which are sent by infrastructure managers to railway undertakings who process them to release suitable pre-journey information and information during the journey for passengers in case of disruption or delays.

Considering the operational character of these messages and such a twofold information flow as proposed by ERA, the practical experience of passengers would be confusing in case of train running disruption or delay:

- ticket vendors, tour operators and other railway undertakings that sell mobility services from an operating railway undertaking would receive messages from both the infrastructure manager and the operating railway undertaking;
- because the messages sent by the infrastructure manager relates to the theoretical path allocated, the operating railway undertaking would normally need to adapt or enhance the specific train information taking into account the impact of the disruption/delay with train operations.

Thus, in case of train disruption or delay, the twofold information flow proposed by ERA triggers a difference between the infrastructure manager's message content and the message content of the operating railway undertaking which will be more complete and relevant to the circumstances of individual travellers, and thus more suitable for passenger information.

Consequently, **CER/EIM/UNIFE and EUTT are in the opinion that the latest ERA's proposal for the TAP TSI Regulation to specify TAP TSI real-time messages as an appropriate technical mean** for infrastructure managers, railway undertakings, ticket vendors, tour operators and station managers to implement Article 10 of Regulation (EU) 2021/782 without finding an agreement on the solution **goes against the smooth and flexible access to the information** promoted by the Regulation at the detriment of the passenger experience, and is thus not fit for purpose.

Return of experience from sector stakeholders

In that context, there are important aspects to be taken into account:

Infrastructure related aspects:

- The legal relationships of the infrastructure manager are bound by its Network Statement which is established with the operating railway undertakings only, neither with the ticket vendors, tour operators, nor other railway undertakings which may sell their services;
- Infrastructure managers paths are theoretical and not necessarily aligned with the commercial timetable operated by the railway undertakings which information is of interest for the passengers;
- The infrastructure managers are not fitted to create or handle passenger information which is produced by the operating railway undertaking;
- Infrastructure managers are currently not structured to handle and keep up to date all the information related to the different world/EU-wide stakeholders selling rail services operated on their network, whereas for operating railway undertakings this is already a part of their established commercial business;
- Infrastructure managers' timetabling systems are managing real-time information communicated by the infrastructure manager to the operating railway undertaking for purely operational purposes, which may thus be difficult to process for passenger information purposes.
- Infrastructure managers use different reference files for operation than those used for retail purposes which would introduce a mapping issue requiring additional

maintenance, costs and time to be solved appropriately, and introducing more room for errors.

Passenger information related aspects:

- Operating railway undertakings and station managers are infrastructure managers' customers and the information channelled from the latter to the former must be fed in the times and the terms required in order to ensure that information, accordingly processed by the operating railway undertaking, reach passengers in compliance with the provisions of Article 10.
- TAP TSI real-time messages are intended for operational Business-to-Business information flows. The use of these messages to produce passenger information is unfit for purpose and risks to make the communication not efficient, and very costly;
- Operating railway undertakings know what information need to be provided by the infrastructure manager, using the tools and procedures available to that effect, and accordingly processed by the operating railway undertaking into passenger information.

Technical aspects:

- The existing framework of telematics applications enable every mobility stakeholder to exchange messages with a prerequisite to be identifiable with a four-alpha numerical "organisation code" which for TAP is only numerical (until 2025, and later for companies trading with OSDJ states), and is thus by design (only 10k codes) not allowing to identify all world/EU-wide stakeholders selling rail services;
- While answering operational needs for communication between infrastructure managers and operating railway undertakings, TAP real-time messages, as Train Running Information message, are rigid (one information = one message), and their architecture is fixed with limited flexibility;
- TAP TSI real-time messages (Train Running Information, Train Running Forecast, and Train Running Interruption) are currently sent by the infrastructure manager to at most three stakeholders: concerned operating railway undertaking(s), concerned station managers, and when relevant next infrastructure manager. If these messages should be sent to all ticket vendors, tour operators, and other railway undertakings, each message would be potentially sent to many more stakeholders.
- From a CER/EIM/UNIFE perspective, such an information flow as proposed by ERA would require a new network flow allowing to broadcast these messages to relevant recipients. Additionally, a recent impact analysis performed by infrastructure managers demonstrated that it would lead to a complete and costly reshaping of the IT servers and the IT architecture of the infrastructure managers. Because infrastructure managers do not have any commercial relationship with ticket vendors or tour operators up to now, it would also have an important impact on the business processes and the workload associated with the maintenance of these new contracts and new data in the IT system with data, and require corresponding important investment to ensure data security.

Contractual aspects:

- While ensuring a complete, accurate, and reliable continuous access to passenger information, the Regulation should enhance the position of the customer and foster trust between stakeholders;
- From a CER/EIM/UNIFE business-oriented perspective, trust in operating railway undertakings' information is ensured via existing commercial agreements with ticket vendors, tour operators, and other railway undertakings which sell their services;
- For complete, accurate, and reliable continuous access to passenger information, all stakeholders selling operating railway services can suffice with only a one-off request and connection with the operating railway undertakings holding the messages entailing added value for passengers;
- Obligations of Article 10 of Regulation (EU) 2021/782 are met if they are fulfilled within the context of the MMTIS Regulation (EU) 2017/1926.

CER/EIM/UNIFE's and EUTT's conclusion:

“CER/EIM/UNIFE and EUTT recommend securing a fair, reasonable, and non-discriminatory (FRAND) playing field”

To promote smooth and flexible access to real-time passenger information in accordance with Regulation (EU) 2021/782, and considering the above-mentioned aspects without prejudice to the implementation of operational communications between infrastructure managers and operating railway undertakings which are necessary to operate transport services, **CER/EIM/UNIFE and EUTT believe that appropriate technical means to ensure access to real-time passenger information in accordance Article 10 shall take into account the following to guarantee the highest possible standard of customer service:**

- infrastructure managers and operating railway undertakings the necessary flexibility to offer the most appropriate technical means depending on the requester's needs;
- ticket vendors, tour operators, and other railway undertakings to access the most complete, accurate and reliable real-time passenger information upon a one-off request.

Looking forward to further dialogue with the European Commission to finding a suitable solution regarding the regulatory framework on the provision of TAP TSI real-time information, CER/EIM/UNIFE and EUTT believe that any outcomes should be workable for all affected stakeholders and ensure that passengers receive complete, accurate and reliable real-time information. In that respect we acknowledge the respective position of different sector stakeholders:

CER/EIM/UNIFE and EUTT recommend to define a European framework **securing a fair, reasonable, and non-discriminatory (FRAND) playing field**, taking into account all parties' needs and constraints thanks to an open dialog with the sector until a consensus is found, as we did in the past for example on the Minimum Connection Time subject.

Additionally, CER/EIM/UNIFE recommend to further specify appropriate technical means to ensure access to real-time pre-journey information and information during the journey **through the conclusion of a contract or other arrangements between concerned stakeholders**, but not through additional specifications in the TAP TSI regulation.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together around 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter [@CER_railways](https://twitter.com/CER_railways) or [LinkedIn](#).

About EIM

EIM, the association of European Rail Infrastructure Managers, was established in 2002 to promote the interests of the infrastructure managers in Europe. EIM's primary goal is promoting growth of rail traffic and the development of an open sustainable, efficient, customer- oriented rail network in Europe. To find out more about EIM, visit www.eimrail.org

About UNIFE

Based in Brussels since 1992, UNIFE is the association representing Europe's rail supply industry at the European Union (EU) and international levels. UNIFE's members include more than 100 companies – from SMEs to major industrial champions– active in the design, engineering and manufacture of rolling stock (i.e. trains, metros, trams, freight wagons) as well as rail signalling and infrastructure equipment. UNIFE also brings together the national rail industry associations of 11 European countries.

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. eu travel tech's members include Amadeus, Booking.com, eDreams ODIGEO, Expedia Group, Skyscanner and Travelport. Associate members include American Express GBT, etraveli Group, Trainline and TripAdvisor. Strategic Partners include Lastminute.com, Travix, Travelgenio, and CWT.

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