



9th Florence Intermodal Forum

Towards EU-wide intermodal
ticketing

*There is currently only a very
limited offer of through-tickets.
How to ensure journey-
continuation?*

Trainline is the world's leading independent rail and coach travel platform



We sell tickets on behalf of more than 270 rail and coach companies and are adding more all the time



We sell train and coach tickets worldwide, helping our customers travel in and across 45 countries in Europe and the rest of the world



We sell tickets to people living in more than 175 countriesⁱ in 14 languages



Our customers can book in 10 currencies and payment methods include **Apple Pay, PayPal, Google Pay, SOFORT & iDEAL**



We have built Europe's leading train and coach app – with a 4.9/5* ratingⁱⁱ



There are more than 39.4m cumulative downloads of our appⁱⁱⁱ



Our platforms host more than 90m visits per month^{iv}
88% of our transactions are mobile^v



Our team numbers more than 700 people and more than 50 nationalities, including 400+ travel tech specialists and engineers

About Trainline

Trainline is the leading independent rail and coach travel platform selling rail and coach tickets to millions of travellers worldwide. Via our highly rated website and mobile app, people can seamlessly search, book and manage their journeys all in one place. We bring together millions of routes, fares and journey times from more than 270 rail and coach carriers across 45 countries. We help our customers find the best value fares for their journey and smart, real time travel information on the go. Our aim is to make rail and coach travel easier and more accessible, encouraging people to make more environmentally sustainable travel choices.

- i. Based on transactions from weeks commencing 06/10/2019 to 23/11/2019
- ii. iOS rating from UK AppStore as of 29 November 2019
- iii. Trainline data for November 2019 (incl. UK consumer number Web/App and EU Web/App)
- iv. Average monthly visits for year ended 29 February 2020
- v. UK consumer mobile app transactions for the year ended 29 February 2020

New rail-travellers can be only attracted by collaboration in between operators and distributors + development of competition on rail

Competition on Rail

Better offer for rail-travellers
(e.g. Italy + France)

Level-playing field for independent distributors:
Find tailor-made solutions out of these offers to rail-travellers



Experiences with through-ticketing in rail

United Kingdom



- Market organisation in competition
- Early necessity for through-ticketing
- Development of Split-ticketing plus other services
- Digital Ticket Sale doubled in the last two years on 40 % in UK

Italy and France



- Italy first continental country with competition in high-speed
- Through-ticketing successfully working by Trainline as SNCF and Trenitalia, Italo give data access
- "Recup-Retard"
- Market opening in Regions: Art. 28 LOM gives access under FRAND-principles

Germany and Spain



- Little competition on high-speed rail in GER
- Incumbent integrated distributors and hinder access to data and viable commissions
- Competition only recently in ESP
- **GER – press-statement Bundeskartellamt on rail-ticket distribution gives hope!**

More Choice, multimodal journeys, cross-border journeys

Le Figaro of 27/04/2022:

"Due to a lack of information, many travellers refer to the only company they know, the SNCF, and are unaware of the operation of foreign networks, which are often shared between a national company and several private operators," says Christopher Michau, director of operator relations at Trainline.

This platform partly fills these gaps by putting on sale tickets from almost a hundred European rail operators, but also from bus operators. It is thus possible to make a single reservation for a long journey with several connections, such as Paris-Stockholm. This is not the case with SNCF Connect, which primarily sells its own offer.



What needs to be done to improve the situation in the EU?

Europe is still on the ground: hindering is the missing level playing field for independent distributors, vertically integrated distributors and public transport authorities (PTA) in the following areas:

- **Full content data access** (= e.g. real-time data, prognostic data, historic data)
- **Advertisement restrictions** (= e.g. bidwords)
- **Remuneration**
- **Access to distribution for PTA**
- **First level playing field, than technical harmonisation**
- Independent distributors already now find ways to improve service on the basis of data-access without time-consuming discussions and harmonisations in between railway-operators





MDMS – legislation

European Framework for a level playing field in all member states, must include

- **Access to real-time data** in order to insure consumer information and to develop customer service
- Including **access to PTA's distribution** (ex. Art. 28 LOM in France with clear access rules in this respect).
- **Access under FRAND-principles** (fair, reasonable and non-discriminatory)
- **Viable commission level** for distributors services (own service level for consumers + generating clients for railways – remuneration needed)

Bundeskartellamt

- Seems to supports this direction

Main tool for establishing a level playing field: FRAND

Fair, Reasonable And Non-Discriminatory principles

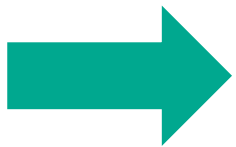
What it is...

- Legal concept found in a wide variety of EU-sectorial legislation
- Content in sector practices, clarified in regulation, implementing measures etc.
- relevant practices must include:
 - ✓ Brand-bidding restrictions, marketing restrictions (fair)
 - ✓ Unsustainably low commission fees (reasonable)
 - ✓ Self-preferencing of RU-owned distribution arms (non-discriminatory)



What needs to be done...

- Description of FRAND requirements for the railway sector on the EU-level
- Establish amendments / wordings for incorporation of FRAND into a MDMS-legislation
- Finding a supervisory procedure that speeds up the appeal-possibilities in case of disagreement on contractual terms



- ✓ Art. 28 LOM in France contains FRAND for access to PTA's
- ✓ Bundeskartellamt (Federal cartel office, Germany) – press statement

Back-up



Through-ticketing in the UK and advantages

Cheapest Fares

Cheap train tickets can be a real benefit for those looking for a day out on a budget. Booking cheap train tickets in advance with Trainline can save you up to 61%* on a standard fare.

- Generally, train fares go up in price, right up until the day you travel. Trainline's Journey Planner tells you live train times, ticket costs and route stops.
- We have got different features in our app, like Price Prediction, which helps pinpoint the best time to book the ticket and SplitSave, which can make your journey cheaper but splitting it into separate tickets.

Ticket splitting

The savings from splitting a journey into separate tickets come from taking advantage of the complexities of the UK rail fare system.

- Ticket prices in the UK are determined by train operator, journey duration and fare types, such as Peak and Off-Peak.
- So, the biggest discounts for split tickets tend to occur at the times of day Peak times end and Off-Peak windows open, such as the morning and evening rush hours.



Flexi Season Ticket

Flexi Season ticket offers 8 days of unlimited travel in 28 days – travel any time between two named stations. It's a flexible solution that's perfect if one needs to travel to work two or three times a week Monday to Friday at Peak times.

- It comes as a bundle of 8 Day Passes you must use within 28 days.
- Each Day Pass allows unlimited travel for 1 day between a given origin and destination station. The 8 days of travel don't need to be specified in advance, giving more flexibility.
- E.g., with a Flexi Season one may choose to travel 1 day for the first week, 4 days in the second, and 3 in the third, enjoying more flexibility than with a normal Season Ticket.

Through-ticketing in the EU, already now Trainline can attract new travellers

More choice

Journey from Köln/Bonn Airport to Mannheim offering BlablaCar Bus Coach and DB.

- This combined train/coach journey is slightly slower but cheaper than train journeys at a similar time.

Multimodal journeys

Journey from Amiens in the North of France to Chambéry Challes-les-Eaux (between Lyon and the France-Italy border) includes the Paris-Lyon segment on which SNCF and Trenitalia compete

- Paris to Lyon already includes the recently introduced service offer by Trenitalia.
- This combined service option is not offered on either carriers' own distribution website.

Cross-boarder journeys

Journey offered from Bordeaux to Vienna.

- Trainline offers more options and faster connections and cheaper tickets (although not necessarily for the same departure time).
- At equivalent departure times Trainline is more expensive than the tickets on DB's website, yet connection offered is faster (18h compared to one day) and booking experience more customer friendly
- On operators' websites, the booking process is impossible.

- ✓ Technical harmonisation important, but not a prerequisite for through-ticketing
- ✓ But level playing field – full data content + viable remuneration is needed!

Key initiative on “facilitating conclusion of commercial agreements between carriers and retailers” : Multi-Modal Digital Mobility Services

What do we expect ?

- Acknowledgement of **need for regulatory action to facilitate conclusion of commercial agreements** with carriers
- **Level playing field** in between ticket vendors and railway operators
- **Teardown of market barriers** (access to existing ticket vending channels, ticket + fare data, data and operations in reservation systems)
- **Technical availability of data** for independent ticket vendors + real-time information
- Introduction of **FRAND-terms**



Risks to mitigate!

- **Long timeline** (legislation applicable not before 2024/2025)
- **Who will supervise?** Competition authorities? We need a quick procedure that facilitates supervision.

Thank you

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