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Multimodal travel and passengers rights: which role for travel intermediaries?

Towards EU-wide intermodal ticketing

9th Florence Intermodal Forum

May 2nd, 2022

eu travel tech: technology is changing travel, let us tell you how!

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Travel Tech intermediaries

Global distribution systems (GDSs)



GDSs aggregate content from travel service providers and other sources and provide technology solutions to both travel providers and travel sellers to make their distribution more efficient.

Metasearch engines

Facilitate the choice of consumers by displaying travel options and directing them to supplier and OTA websites and apps to book their travel.



Online Travel agents



Online consumer-facing platforms distributing travel services to travelers (“OTAs”)



Travel Management Companies

Travel agents that fully manage the business travel requirements for individuals, companies, and organizations (“TMCs”).



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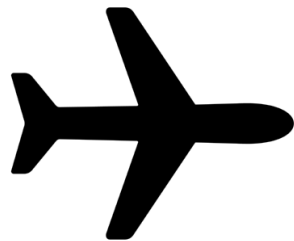
Passenger rights: which added value for intermediaries?

- As independent intermediaries, unaffiliated with any transport operator, the implementation of many passenger rights is beyond the control of eu travel tech members, such as:
 - ✓ Rules regarding luggage and special equipment.
 - ✓ Liability rules for delays and disruption
 - ✓ Accessibility and assistance for PRMs
 - ✓ Security and quality of transport service
- However, their role is important to inform the passengers, even more so for multimodal travel:
 - By definition, multiple transport operators are involved in a multimodal journey.
 - Therefore, none of them is in a position to provide comprehensive information on the overall journey.
- Travel intermediaries could be the single point of contact for passengers throughout multimodal trips; ensuring adequate information of the passenger at all stages of the journey. They are able to offer familiar interfaces and customer service options in travellers' native language, wherever they are travelling. This is not the case for most transport operators.
- But they need to get access to the relevant data from the transport operators.

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Case study: a family under the Tuscan sun!

- Emmanuel and Marie have 2 daughters, Joséphine (5) and Agathe (2). They live in Brussels and want to visit Tuscany for their summer holidays. They are environmentally conscious and would like to optimise their journey, limiting CO2 emissions as much as possible.
- They are therefore considering booking an air-rail trip, going from Brussels to Florence by combining different modes of transport.



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Before the trip

Emmanuel and Marie are looking for their travel options.

- Travel intermediaries can “help both passengers and/or other intermediaries compare different travel options, choices and prices, and can facilitate the sale and re-sale of mobility products from different operators, whether they are private or public, within one mode or across modes”*

On OTA platforms, Emmanuel and Marie could:

- Compare and combine offers from different modes of transport.
- get access to all relevant precontractual information : schedules, connection times, fares but also ancillary services and CO2 emissions information

*MDMS Inception impact assessment roadmap

The screenshot shows a flight search interface with the following details:

- Search criteria: From Brussels, To Florence, Departure Tue 17 May, Return Sun 22.
- Filters: Economy class, 4 passengers, 4 bags.
- Options: Pricing table, Price trends.
- Results table:

Best	Cheapest	Fastest	Other options
894 € · 15h 48m	854 € · 30h 08m	1,471 € · 3h 40m	Earliest departure
- Flight details for the Best option (894 €):
 - Tue 17 May: 16:45 Brussels South Charleroi (CRL) to Florence Santa Maria Novella (1 stop, 4h 23m).
 - Sun 22 May: 10:05 Florence Santa Maria Novella to Brussels South Charleroi (CRL) (2 stops, 1h 25m).
 - Includes 5 nights in Florence.
 - Includes Travel hack, Economy class, 2x 20 kg baggage, and 2x 8 kg baggage.
- A red circle highlights the price 894 € in the bottom right corner.

Before the trip

Emmanuel and Marie need a lot of information before being able to make their choice, such as:

- Air segment: possibility for the baby equipment to be transported and for the whole family to be seated together without additional costs (or for which additional costs?)
- Connection times and existence of a convenient transfer option between the airport and the rail station

Such information is currently too often missing on travel intermediaries platforms as relevant data is purposefully not shared by transport operators or not shared under FRAND terms.

- Building such a multimodal journey can prove very cumbersome!

Search Passenger details Ticket fare Kiwi.com Guarantee Seating Overview & payment

Brussels → Florence and back

Trip summary

DEPARTURE Duration: 4h 23m

Tue 17 May **Economy**

16:45 Brussels CRL
18:25 Pisa PSA 1h 40m

Priority boarding included (1. Passenger, 2. Passenger) [Learn more](#)

1h 29m layover

Self-transfer at Pisa Centrale Station
Changing transport is your responsibility

Train — [Show details](#)

19:54 Pisa Centrale Station
21:08 Florence - Santa Maria Novella 1h 14m

5 nights in Florence

RETURN Duration: 11h 25m

Sun 22 May

Train — [Show details](#)

10:05 Florence - Santa Maria Novella
12:31 Brescia Train Station 2h 26m

26m layover

Self-transfer

Train — [Show details](#)

12:57 Brescia Train Station
13:54 Bergamo Train Station 57m

6h 06m layover

Self-transfer at Milan BGY (IT)
Changing transport is your responsibility

Economy

20:00 Milan BGY
21:30 Brussels CRL 1h 30m

Priority boarding included (1. Passenger, 2. Passenger) [Learn more](#)

2x Adult	453.52 €
2x Child	440.02 €
Cabin baggage	123.20 €
Checked baggage	247.34 €
Total (EUR)	1,264.09 €

During the trip

Emmanuel and Marie have booked their tickets and it is now time to leave. Before going to the airport, they would like to check that their trip will not suffer any disruption:

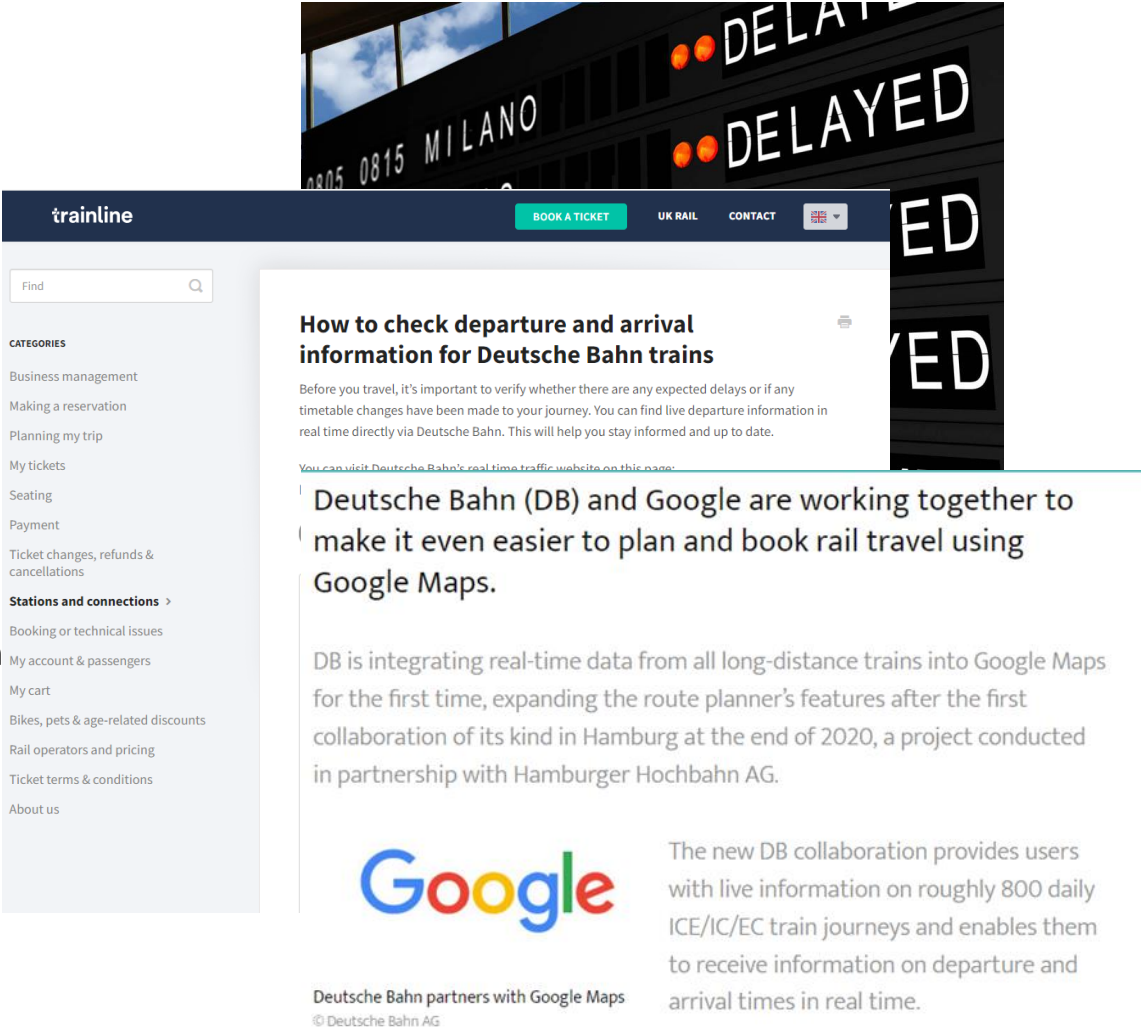
- Confirmation that the flight/rail trip will not be cancelled (quite useful in COVID times)
- Existence of any delays or change in their travel information (change of terminal, platform).

Such information is not always made available to travel intermediaries. Though it is available to some of them.

Fortunately, the Rail Passenger Rights Regulation addresses the issue: ticket vendors have to inform their customers in case of disruption, an obligation supplemented by an obligation for rail operators to provide such real-time information to their ticket vendors.

- Need for a similar obligation for all modes of transport. Customer should be treated equally wherever they book!

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The image shows a screenshot of the trainline website. In the background, there is a black sign with white text that reads 'DELATED' and 'DELATED' (partially visible). The website header includes the 'trainline' logo, a 'BOOK A TICKET' button, and links for 'UK RAIL' and 'CONTACT'. A search bar is visible with the text 'Find'. The main content area features an article titled 'How to check departure and arrival information for Deutsche Bahn trains'. The article text reads: 'Before you travel, it's important to verify whether there are any expected delays or if any timetable changes have been made to your journey. You can find live departure information in real time directly via Deutsche Bahn. This will help you stay informed and up to date.' Below the article, there is a section titled 'Deutsche Bahn (DB) and Google are working together to make it even easier to plan and book rail travel using Google Maps.' The text continues: 'DB is integrating real-time data from all long-distance trains into Google Maps for the first time, expanding the route planner's features after the first collaboration of its kind in Hamburg at the end of 2020, a project conducted in partnership with Hamburger Hochbahn AG.' The Google logo is displayed, followed by the text: 'The new DB collaboration provides users with live information on roughly 800 daily ICE/IC/EC train journeys and enables them to receive information on departure and arrival times in real time.' At the bottom, it says 'Deutsche Bahn partners with Google Maps' and '© Deutsche Bahn AG'.

In addition, live operational reports such as track changes or information – for example in the event of severe weather-related restrictions – are displayed directly in Google Maps.

During the trip: self-transfer guarantee

Emmanuel and Marie have decided to opt for an air-rail journey, with a “self-transfer”: no connection guarantee, as opposed to through-ticketing in rail or interlining in air.

However, travel intermediaries are developing alternative solutions to allow their customers to get adequate assistance in case of a missed connection:

- In air, for “virtual” interlining (an intermediary builds a journey with two different flights, in order to offer the best possible fare to its customers), the intermediary can take liability for the connection through a “self-transfer guarantee”.
 - For air-rail journeys, there are already similar products.
- With adequate access to relevant multimodal contents, multimodal self-transfer guarantee could be further developed by intermediaries, offering to passengers both the best fares and protection in case of missed connections.

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TripStack Self-Connect Guarantee

- TripStack provides 24/7 pre-trip Customer Support available in multiple languages

Dohop Connect

These are the Terms on which Dohop supplies Dohop Connect to the Customer. A reference is made to the definitions in chapter 1.

Dohop Connect is comprised of services which enables booking of Self-Connecting Trips and in case of travel disruptions, provides Customers with the Services and access to the Customer Assistance Programme.

The purpose of Dohop Connect is to make your self-connecting journey more secure and comfortable in case of travel disruptions where a trip is rescheduled, delayed or cancelled by the Booking Agent, causing the Customer to miss one or more Connections to the Customer’s final destination. Booking flights via Dohop is possible only if the Customer purchases Dohop Connect and pays the Dohop Connect Service Fee. This also entitles the Customer to participate in the Customer Assistance Programme. The Customer Assistance Programme is a discretionary service and available to the Customer for the duration of the Dohop Connect Itinerary and is subject to the Terms specified herein.



After the trip

Unfortunately, Emmanuel and Marie have seen their train being delayed on their way back, opening the possibility for them to get a compensation.

COVID-19 has shown how difficult getting a refund or compensation from a TSP could be. It could even prove harder when you deal with multiple TSPs in multiple countries, with interfaces not always available in your own language.

- In case of cancellations, refunds can be claimed through the intermediary.
- Travel intermediaries can also assist passengers in their compensation claims, serving as a one stop shop for all claims related to a given journey.
- However, only possible when travel intermediaries have access to the right data and when TSPs comply with their legal obligations under passenger rights legislation

TRAINS AU DEPART				
TRAIN DEPARTURES				
TRAIN	N°	HORAIRE	DESTINATION	OBSERVATIONS
TRAIN	N°	TIME	DESTINATION	REMARKS
TGV	57238	12:39	BARCELONE	A L' HEURE
TGV	8471	12:57	BORDEAUX	A L' HEURE
TGV	8765	13:16	MARSEILLE	RETARD IND
TER	56117	13:31	LAROCHE	RETARD IND

How to request a refund?

Nouveau

Récup' Retard

Votre train est arrivé en retard à destination ? Aie. Nous ne pouvons pas remonter le temps, mais nous pouvons vous aider à obtenir un dédommagement*.

Le temps, c'est parfois de l'argent

69 % des clients éligibles à une compensation ne la demandent pas systématiquement**, soit parce qu'ils ne savent pas comment faire ou tout simplement, parce qu'ils ne sont pas au courant qu'ils y ont droit. Avec Récup' Retard, ne passez plus à côté d'un dédommagement.

C'est simple et rapide

Nous vous prévenons lorsque vous avez droit à une compensation, estimons son montant et facilitons votre demande pour vous. Le plus Trainline ? Pas besoin de chercher et de remplir le formulaire G30 SNCF de votre côté, nous nous en chargeons à votre place. Pour y accéder, il vous suffit de télécharger notre app.



Passenger rights and multimodal travel

➔ With multimodal itineraries involving by definition multiple operators, operating under different legal, technical and commercial conditions, implementing passenger rights will be challenging.

➔ In this context, travel intermediaries can fill a gap and be the one-stop-shop ensuring a seamless trip to the passengers and providing them with all relevant information regarding their rights, before, during and after the trip.

➔ However, this is entirely dependent on such travel intermediaries getting access to the relevant data from transport services providers!

Thank you!

Emmanuel Mounier
SECRETARY GENERAL

M +32 499 80 13 74

emounier@eutraveltech.eu

Avenue Marnix 17
B – 1000 Brussels

www.eutraveltech.eu

[@eutraveltech.eu](https://twitter.com/eutraveltech.eu)

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