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We are pleased and happy with the collaboration on the Multimodal Digital Mobility Services (MDMS). We believe and trust that the MDMS initiative may represent an opportunity to align and collaborate to provide the Digital Mobility Environment in Europe.

To make sure we are all moving forward in the right direction, the MaaS Alliance is keen to keep the focus on creating the right "**digital"** as well as the right "**governance**" frameworks to serve the "**users**".

With a high interest we took notice of the Press Release of CER on their view on positioning in regards to Multimodal Digital Mobility Services, 17 January 2023: https://www.cer.be/media/press-releases/european-rail-sector-committed-improving-rail-distribution-ticketing

The main objective we are aligning on is to face the Climate Crisis. The scope of the European Commission and the MDMS is realisation of the "European Green Deal" with the right output that makes a positive impact on the Climate Crisis. All the actions we do, should be supporting the need to safe the future.

The MaaS Alliance want to point out that if we want to achieve this goal, we need to work together on:
- Connecting to the Open Mobility ECO System
    - All Mobility Operators within all sectors should connect.
        - Tear down the Silos between sectors and/or Mobility Providers.
    - The digital guidance to connect is set:
        - Roaming between platforms
        - Portability of the mobility account
        - Mobility Initiation Services Provider: real-time delegation of mobility services provisioning (Mobility Initiation Services Provider role)
- EU regulation on Interoperability is needed to align on creating the right propositions.
    - Clear roles between Public Authorities and Mobility Operators to manage the output.
- We need to work together on providing the right Output to make and facilitate Users and to steer on the best impact to users
    - Impact on User Behaviour
    - Impact on Environmental and Commercial Models
    - Impact on Urban Development and Urban Mobility

To reflect to the points mentioned by CER:
- Sector Solutions are the fastest:
    Now we need to make sure that all sectors, including CER, are facilitating the Open Mobility Eco System. All Mobility Providers should focus on realizing the Platform Economy and the 3 API`s that are needed. By doing so, we can all focus on the proposition towards Users, Optimalisation of the Assets and facilitating the Modal Shift from Owning to usage.
- Passengers need Low Prices:

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The whole idea is to provide all passengers with the right proposition to choose from. Meaning, at every location, at every time, each individual user should know what available Mobility options there are and which options a user can choose from.

- Well-defined "fair, reasonable and non-discriminatory (FRAND)"principles:
  o We should focus on protecting the Environment. The FRAND principles should be in place to reach the Green Deal targets and to serve the needs of users.
- Dominance of digital platforms:
  o The roles within the Open European Mobility ECO System need to be clearly set and cover all stakeholders that want to cooperate. The different roles of operators, public authorities and service providers need to be set in such a way that all stakeholders are working and collaborating to create the Open ECO System with the right propositions to serve users. For digital platforms like Google, Apple, Microsoft, AWS, this should be very clear that they can be a part of the Open Mobility ECO System, but based on the rules set by the EC and with a purpose to cooperate on facilitating Users.
  o Providing the right to commercially integrate with digital platforms is an option that should be regulated. The real question to answer is: Who is setting the proposition for the USER?
    ▪ The proposition is always the outcome of the Mobility Orchestration Layer (Mobility Management) between the Public Authority and the Mobility Operators.
    ▪ All MaaS Providers can connect to the Open MaaS Ecosystem through the FRAND principles, to retrieve the Propositions.
- Protect Non-Digital Ticket Sales:
  o Completely Right. Ticketing: Ordering and Print options at stations or at Service Points should be available for all.
  o Remember, all services that are available through an App are also available through a Service Provider. The need for a Vendor Machine is to be reconsidered, especially that this target group needs to be serviced by a human interface.
- Railway already shares data.
  o Indeed, incredibly good. The next step should be the discussion of what we want to achieve with the shared data. The outcome of the Mobility Orchestration Layer (Mobility Management) between the Public Authority and the Mobility Operators. The output of these discussions are propositions:
    ▪ Traveling <500KM: Option of Train with first and Last mile is more attractive than taking the plane.
    ▪ Traveling with more persons (Family): Options of train with the first and last mile should be made more attractive than going by car.
- No Obligation to sell competitors tickets:
  o All trips and options are offered to the user through the same API`s. Every Operator should focus on its own Proposition. To connect to the Open Mobility ECO System, by tendering or by law, means that you need to connect to the Eco System.
  o To serve the User, they can choose all mobility options that are available.

Rephrasing the fundamental issues:
- Stop thinking and protecting your own sector, open to facilitate Users and safe the climate.
- All players and Stakeholders can connect.

- Keep control of the public domain: The Mobility Management discussion between PA and PTO will define the proposition.

Within the MaaS Alliance, we are open to align and discuss the way the Open MaaS ECO System should be deployed to serve users.

Sincerely,

Roelof Hellemans
Secretary General MaaS Alliance