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1   The European Green Deal Context

The European Green Deal calls for a 90% reduction in greenhouse gas emissions from transport by 2050, to help the EU become the first climate neutral continent. As part of the Grean deal, the EU commission has adopted a strategy to bring transport on track for the future.[1]

Figure 1 European Mobility Strategy

1.1   Objective 2: Smart Mobility: Flagship 6: Multimodal mobility and MaaS

The EU Mobility Strategy will be executed through 10 flagship areas. Flagship 6 relates to multimodal mobility and MaaS – Making connected and automated multimodal mobility a reality. This is the subject of this paper as it addresses key digital mobility services which are needed to be adopted to advance the use of more sustainable modes of mobility throughout Europe.

The 2 main initiative are
1. The revision of Delegated regulation (EU) 2017/1926 aka MMTIS
2. The development of Multimodal Digital Mobility Services (MDMS)

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[1] https://transport.ec.europa.eu/transport-themes/mobility-strategy_en

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1.2   Realisation of the Green Deal

The initiatives are needed to make sure all stakeholders are working together with the same rules and with the best willingness to cooperate. This is a good direction.

To realise the Green Deal, we need to focus on the output and the way we offer options to the users.

The offering of the full "door -to- door" propositions is the most relevant output we need to align on.
- Long Distances within Europe:
    o   the proposition should always favour train above plain or car.
- Urban Areas and Metropolis:
    o   The proposition should always favour the usage of public transport, shared mobility and active mobility to owning a car.
- Rural Areas
    o   The proposition should always favour the usage of shared mobility to owning a car.

What needs to be clear as an output from MDMS and MMTIS:
- The ownership of the proposition,
- The alignment and collaborating on the realization of the propositions,
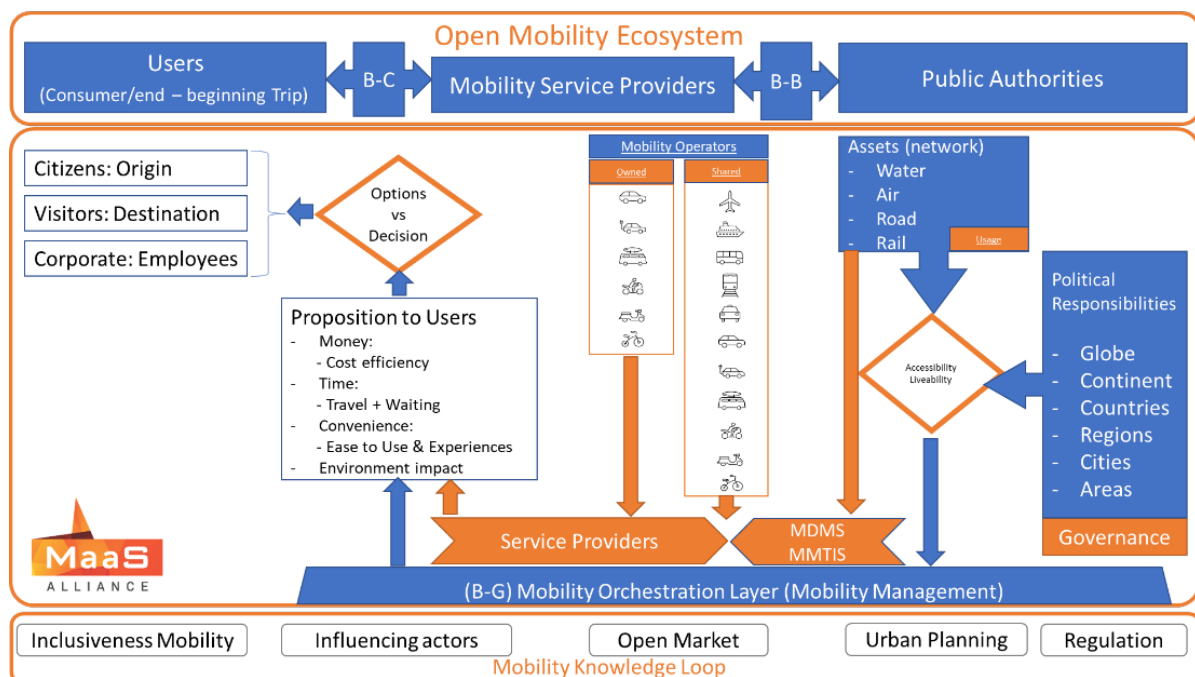- The way the proposition is offered to the user (Price, Time, Convenience, Sustainability)

Figure 2: High Level Open Mobility Ecosystem

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2   High Level Purpose and Scope of the MDMS

We see many good initiatives coming out of the MDMS. Our concern is that we are missing elements coming out of the MDMS that could improve the European Green Deal.
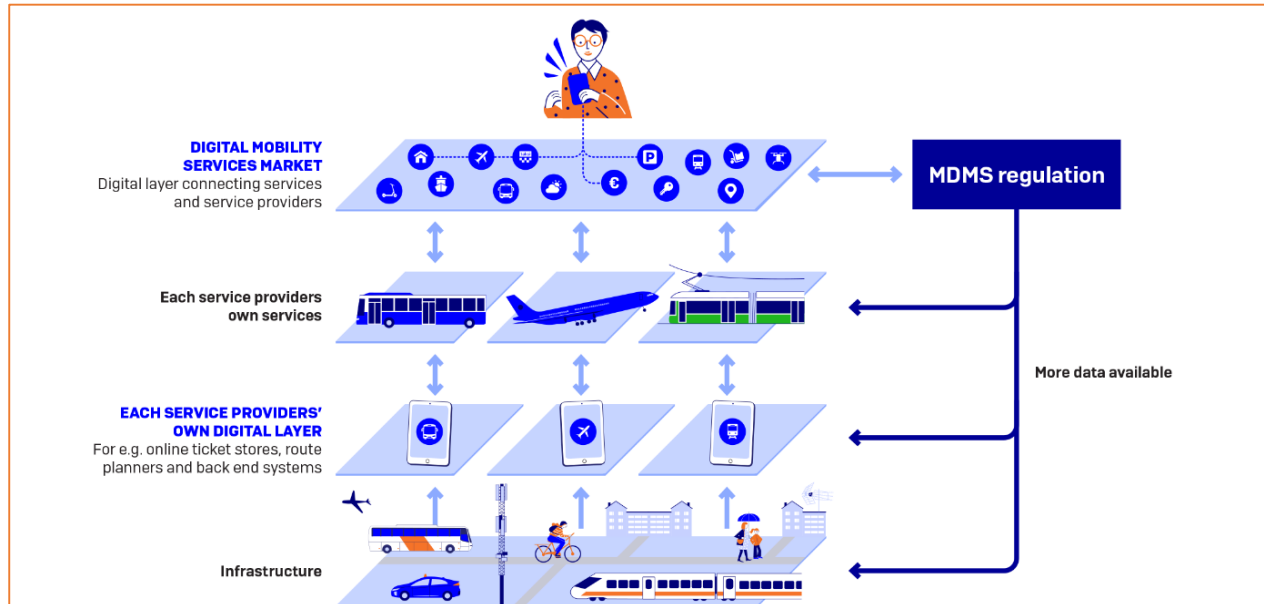

Figure 3: High Level Overvieuw of MDMS

2.1   Scoping of the Mobility Market

The scope of the MDMS should cover all stakeholders without boundaries, geo-borders or silos. The MDMS should organise the way we work together with clear rules that covers all private and public stakeholders.

Right now we see the focus put on the "long distance": aviation and rail. This is good to open up, but we need the full Mobility Market with all the Mobility Options. Next focus should be on Urban and Rural areas.

We also need to make sure that we cover Mobility Services and Infrastructure into scope. In particular parking.

Prioritasing on scope:
- The focus now is on long distance: Aviation and Rail operators
  - o   No Go: thresholds within aviation
- The aim is to have all Mobility Service Operators and to get ride of any silos
  - o   Allignment with SUMPs and SUMIs

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2.2   Rules

The rules between Private and Public need to be clear and focus on the output for users.
The difference responsibilities between Public Authorities and Private/Public Mobility Operators should be pointed out.
- License to operate within the public domain,
- Operating model between public authority and Public/Private Mobility Service Providers

Within these rules and regulation we should make sure:
- Tat there are no unfair contract terms
- Infringment of obligations is set by law
- Infringment of competition law rules

To deploy and keep the MDMS successful, there is the need of a supervising competent authority on matters related to the EU transport services. European Payments Council.

Prioritising on rules
- The focus now is on the collaboration between Public and Private
- The aim is to create the authority to control the EU transport services and maintain the framework.
  - Control of FRAND principles
  - Control of services, standards and API

2.3   Digital Mobility Services

The services offered through the MDMS should be centralised and standardised as much as possible. The establishment of a framework for all stakeholders to connect on the overall mobility platform (for example payment (EPC) has done with PSD2) is a necessary step.
- Services that should be covered are standardised ticketing and payment APIs.
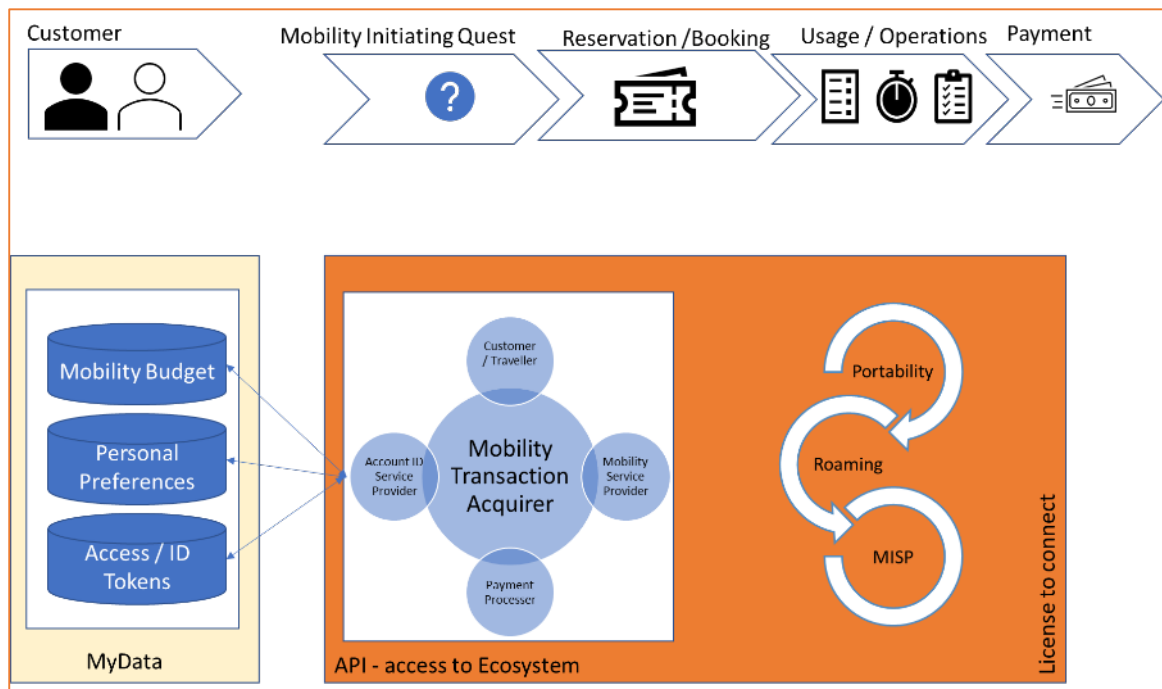- Connecting and operating the Platform should also be covered by Roaming-, Portability and MISP APIs.

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Figure 4 Mobility Transaction Acquirer – Platform & API`s

The European Commission should organise the creation and maintaining of the framework of mobility services. The conditions to operate in fair, reasonable and non-discriminatory terms should also be covered and controlled by the EU. There is the need for the European Mobility Council.

Prioritising on Digital Mobility Services
- The focus is on opening up ticketing for rail operators
- The aim is to create the authority to control the EU Transport Services and maintain the framework through APIs.
    o Procedure to develop APIs
    o Timing on APIs

2.4   Users

We believe that all users have the right to use mobility. We have to facilitate all users to inform and influence them to choose the best option available for them.

Information on mobility options must reach consumers in a neutral way, aligned with personal preferences and actual needs. We can use personal mobility budgets or mobility wallets to influence User behaviour in travelling. Influencing User behavoiur can only be done by a Public Authority on local or national level.

We need to keep the focus on the user and the way we inform them about all the relevant travel options. It is the user who must choose from the various options.

It should also be very clear that the MDMS platforms are accountable for the services offered through their platforms.

Prioritising on Users
- The focus is on opening up all the mobility options
- The aim is to to facilitate users to change the behavior

3   Next Steps: Organisation and Roadmap implementation

We suggest to keep the Mobility Multimodal Passenger Mobility Forum (MPMF) active to align on prioritising the implementation of the MDMS and create a roadmap for the regulation and implementation of the MDMS.