Association of public services and enterprises Austria

Feedback on the Public Consultation

On the Proposal for Multimodal Digital Mobility Services 2026/0113

Vienna, 31 July 2026

About the Association of Public Services and Enterprises Austria

We are committed to ensuring that essential public services remain accessible, affordable, and of high quality for everyone in Austria – today and in the future. Representing more than 120 companies, institutions, and organisations in the field of public services, the Association of Public Services and Enterprises Austria (VÖWG) fosters cross-sector collaboration and knowledge exchange — especially in areas such as energy supply, public transport, water and wastewater management, waste disposal, economic and financial governance, housing, as well as health and social care. VÖWG supports its members with a wide range of services and promotes the values and interests of the public sector at national and European levels.

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Introduction

The proposed regulation on multimodal booking (2026/0113), seeks to establish a Union-wide framework to support the advancement of sustainable and multimodal mobility through the development of a corresponding digital infrastructure for travel search, comparison, and ticketing. In the course of the ongoing legislative procedure, it is being assessed whether the proposed targets and instruments are suitable to meet the current and future requirements of the transport sector, particularly regarding transparency, fair competition, and the operational needs of public service providers. The proposal was published on 13 May 2026 as part of the passenger package.

The proposed MDMS Regulation is an important instrument for advancing European climate and digital policy objectives by supporting transport decarbonisation, a sustainable modal shift and more seamless multimodal travel. However, significant challenges remain regarding technical integration, remuneration models, neutral display requirements and the economic viability of implementation for transport operators.

Public and municipal enterprises play a central role in planning, financing and operating regional and urban mobility systems, including integrated ticketing and tariff structures. Yet the proposal remains largely oriented towards long-distance and cross-border travel and does not sufficiently reflect the operational realities of integrated transport associations, local tariff systems and interoperability requirements such as TEL TSI and OSDM.

VÖWG therefore calls for a differentiated and sector-specific further development of the MDMS framework. The Regulation must enable digital innovation and improved booking services while ensuring legal certainty, proportionate obligations and a sustainable investment framework for public and municipal transport providers. Only such a balanced approach can safeguard economically viable, affordable and high-quality public transport services.

Overview of VÖWG positions

In the interest of ensuring reliable mobility and maintaining high-quality, affordable services of general interest, the VÖWG calls for differentiated and pragmatic solutions within the framework of the proposed MDMS regulation. The key aspects that should be considered in the legislative proposal include:

- **Flexibility on neutral display obligations**

  Allowing MDMS platforms to include personalised and user-based preferences as part of the ranking criteria would increase user-friendliness and reduce complexity throughout the search for multimodal travel options and would be consistent with Article 7 (10) of the regulation. Allowing user-selected preferences as additional ranking criteria would be consistent with Article 7(10), provided that such preferences are transparent, explicitly selected by the user and applied without discrimination between transport operators. Preferences such as minimum connection times could help reflect specific mobility needs and thus minimise the risk of missed connections during a multimodal journey. This could also support customer satisfaction throughout the entire process, from researching travel options to completing the journey. Additional user-selected criteria must complement, rather than weaken, the requirements for neutral display and transparent information on greenhouse gas and CO_2-equivalent emissions. Emissions information should remain clearly accessible and comparable across transport products.

- **Data sharing obligations**

  The data sharing obligations in this regulation should clearly define the actual data to be shared in the context of this regulation and the data that is excluded from the scope. A specification that nothing in this paragraph shall require the disclosure of trade secrets, proprietary algorithms, derived analytics, fare-setting strategies, tariff architecture or other commercially sensitive strategic information, unless such disclosure is strictly necessary to verify compliance with this regulation and is subject to appropriate confidentiality safeguards, would be important. This would prevent unjustified information advantages between competitors, keep administrative burdens proportionate and simultaneously protect the innovation efforts of transport operators and MDMS providers.

Date sharing aspects should be balanced with the need of transport operators to access relevant customer and journey data to provide reliable information, manage disruptions, handle passenger rights and maintain service quality. The regulation should therefore ensure that operators can communicate directly with passengers where necessary and receive appropriate data access when their services are sold through third-party platforms, in full compliance with GDPR. Commercial agreements should not allow MDMS providers to obtain control over fare-setting, tariff structures, branding, customer communication, customer-relationship management or proprietary customer data beyond what is strictly necessary to provide the agreed distribution or re-linking service. Data obtained through such agreements should not be used to circumvent the direct customer relationship of a transport operator or to develop competing products on the basis of privileged information.

- **Scope of the regulation exceptions for urban and suburban transport service providers & inclusion of meta search engines**

  It is important to clarify that urban and suburban transport service providers are exempt from the scope of the regulation in Article 2 (1) (b) and (c) to provide immediate legal clarity for local transport operators. The term "surrounding area" should therefore be defined as a geographical area functionally linked to an urban centre or conurbation through regular commuting and local mobility patterns and predominantly served by urban, suburban or regional public passenger transport.

  Further, this regulation shall not apply to a transport association, or to a service operated on its behalf, when it distributes or re-links transport products exclusively within the integrated public transport network for which that transport association is responsible. In addition, this exemption highlights the regulation's focus on long-distance and cross-border transport services and keeps the administrative burden for urban and local providers at a minimum.

  Online meta search engines (MSEs) that systematically aggregate, compare, rank, display or re-link offers from two or more transport operators perform functions equivalent to those of B2C MDMS providers. Due to their strategic role as gatekeepers, including online meta search engines within the scope of this regulation would guarantee a level playing field for all stakeholders, especially for smaller transport service providers. The inclusion of MSEs within the MDMS regulation would strengthen transparency, fair competition and sustainability while regulating paid prominence and self-preferencing in their online search results to appropriate safeguard. This step would complement legal frameworks such as the Digital Services Act and the Digital Markets Act.

  Such providers should, however, be subject to the relevant obligations of this regulation only insofar as they systematically perform functions equivalent to those of an online ticketing service provider. General online search engines should not fall within the scope merely because individual search results refer users to railway operators or ticketing websites.

- **Legal Recognition of Transport Associations**

  There is no definition of a transport association (Verkehrsverbund), yet a precise definition is important to ensure that transport associations can fulfil their role as planning authorities (data rights), to protect them from overregulation in local public transport and to clearly define their responsibilities regarding ticket sales vis-à-vis private MDMS providers. Legally recognising transport associations in the regulation would provide a clear legal status for these structures and certainty for their integrated networks. Associations often bundle various modes (e.g. rail, bus, tram) into a single transport product, unbundling these local products to meet neutrality ranking criteria would bear significant bureaucracy and contradict operational realities.

  Legally recognising zone- and time-based tickets as transport products is essential as it prevents a regulatory mismatch where area-wide tickets of transport associations might not fit the narrow definition of a "tailored service" meant for long-distance travel. Additionally, recognising multimodality, network-based access, and the collective nature of transport associations would prevent the "unbundling" of regional tariffs and ensure that transport associations are not unfairly categorised as commercial MDMS providers.

Overall, transport associations should be legally defined and recognised in the regulation, while their internal distribution of integrated local and regional transport products should be exempt from MDMS obligations.

A transport association should be understood as a body established or entrusted under national or regional law, or by one or more competent public authorities, to organise or integrate public passenger transport services within a defined geographical area, including through coordinated fares, timetables, ticketing, passenger information or customer services.

- **Conditions for commercial agreements**

  The existing proposal on MDMS allows for remuneration for B2C and B2B MDMS services, however it is essential that public transport service providers are protected against double charging and that there are limits for fees especially for smaller operators. Public transport service providers should not be forced to pass additional distribution costs on to passengers through higher ticket prices. Any remuneration that remains permissible should be fair, reasonable, transparent and non-discriminatory. Transaction-based distribution fees should not be imposed on publicly contracted or integrated public transport products, while transparent and directly attributable technical integration costs may be recovered under proportionate conditions. Lastly, it could also be more difficult for smaller transport providers to enter the market and easier for large MDMS providers to further consolidate their market. The MDMS regulation should adequately address the structural imbalance that may emerge between transport operators and digital platforms. This is particularly important where large non-European platforms enter the European mobility market and gain access to strategically sensitive mobility data.

New Category for 'Public Interest Mobility Platform'

A distinct category of "Public Interest Mobility Platform" should be introduced into the MDMS regulation. Platforms established or formally entrusted under national law to pursue public-interest mobility objectives such as climate policy and the provision of public services should not be treated in the same way as commercially controlled platforms merely because railway undertakings hold shares in them. This category should cover platforms that provide no transport services or tariffs of their own, are not primarily profit-oriented, guarantee non-discriminatory access, apply competition-neutral governance rules and protect commercially sensitive information. Such platforms should be entitled to access timetable, fare and distribution data, conclude contracts on non-discriminatory terms, recover integration, operating, development and compliance costs, and define proportionate technical minimum standards, including open standards such as OSDM. At the same time, they should be required to ensure equal treatment, transparent admission criteria and robust information barriers.

Conclusion

The MDMS regulation should create a fair, proportionate and operationally workable framework that strengthens multimodal travel without undermining integrated public transport systems or shifting excessive control to digital intermediaries. It should allow user-oriented ranking criteria, clearly limit data-sharing obligations to necessary information, protect commercially sensitive data and ensure that transport operators retain access to relevant customer and journey data for passenger information, disruption management and passenger-rights handling.

Personalised ranking options should complement neutral display requirements and transparent emissions information. Commercial agreements must also preserve the tariff autonomy, branding, customer communication and direct customer relationships of transport operators.

The regulation should also provide clear exemptions and legal certainty for urban and suburban operators and transport associations, while bringing meta-search engines performing equivalent intermediary functions within its scope. Commercial agreements must not lead to higher ticket prices, disadvantage smaller operators or reinforce structural imbalances between transport providers and large digital platforms.

Finally, a distinct category of “Public Interest Mobility Platform” should recognise legally established, non-profit-oriented and competitively neutral platforms, granting them appropriate data access and cost-recovery rights while requiring transparent, non-discriminatory governance. Overall, the regulation must combine innovation and booking convenience with data sovereignty, fair competition, affordable public transport and respect for the public-service responsibilities of transport operators.

Responsible for content

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