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## **Position Paper**

Brussels, 28 September 2018

# **Exchange of domestic tariff data**

## **NeTEx standard**

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## Background

In the framework of the TAP TSI revision activity, the ERA has launched a study to analyse domestic tariffs of European railways in order to check whether they can be accommodated in NeTEx (CEN/TS 16614-3:2014) standards, or, otherwise, to provide mitigation measures.

The consultant appointed by ERA, has analysed more than 1.000 fare products (publicly available on the RU's web sites) of: Sweden, France, Italy, Netherlands, Poland, Czech, Hungary, and Portugal.

A dedicated Workshop has been held on 7 September 2018 and the consultant has presented the main results. Main evidences until now: there are many common user profiles (PRM, adult, infant...) and common products (trip, day pass, season pass...) but product packaging and presentation varies significantly; rail/multimodal boundary and pricing conditions is very complex. According to this study results, NeTEx should allow accommodating the modelling of domestic fares.

## Proposed approach

As a general principle, **the sector is in favour of NeTEx**, or any additional standard, but they shall be considered **as a possible option and not in substitution of the TAP format** (e.g. EDIFACT). Being obliged to adapt to a different format would have huge impacts on railways from an IT and an economic perspective, bringing **undue costs to deal with an obligation that does not seems to provide remarkable benefits** to the End Users. Moreover this would be contrary to the freedom of each undertaking to choose the best interoperable standard to implement obligatory functions coming from the regulation in force. Finally the actors that have already implemented these provisions, according to the **existing commonly recognised standards**, would **completely lose their investments**.

Railways should be able to choose which profiles they use – either the ones that replicate the existing Technical Document messages or those that implement the national standards used for Open Data access, where the RU has domestic obligations to make data available.

An additional aspect, that should be further analysed, is **how** NeTEx could accommodate the type of dynamic fares used by many railway undertakings (as for example in Sweden); in fact, several RUs do have dynamic fares also in "short distance" / regional/ "long distance" domestic traffic.

Another concern is that **the study might not be based on the correct/complete set of data** from the RU's website; NeTEx format does not deal with dynamic fares, in addition some tariffs are decided by National Authorities and not by Railways themselves.

From a methodological point of view, the sector strongly recommend to conduct an attentive cost analysis on the impact of such an obligation to adapt a different format instead of the one that is commonly used from every TAP TSI actor so far, also considering the partial view coming from the results of this study. Railways are also conducting their studies and are available to cooperate with the ERA for a more comprehensive study,



reiterating their availability for a close cooperation, which was already expressed since the hypothesis of such study was presented.

## Conclusions

CER, CIT and UIC deem necessary that **NeTEx cannot be considered mandatory, but as a possible option** in alternative to the existing TAP format already in place.

In addition, since the study has not made any impact assessment, the sector strongly ask for an **attentive cost analysis on the impact of such obligation before any action is taken**, and it's available to provide the utmost cooperation for a more comprehensive study.

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### About CER

The Community of European Railway and Infrastructure Companies (CER) brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 77% of the rail freight business and about 93% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit [www.cer.be](http://www.cer.be) or follow us on Twitter @CER\_railways.

### About CIT

CIT is an association of railway undertakings and shipping companies that operate international passenger and/or freight transport services. 136 companies are full members of the CIT and more than 80 undertakings are indirectly affiliated via 6 associate organizations. The CIT is an association under Swiss law, with its headquarters in Bern and has the task to provide all necessary juridical documents and instruments for international traffic at railway level. The CIT support legally the railway undertakings, implement international and European rail transport law, standardises the contractual relationships between the various players (customers, carriers, infrastructure managers, wagon keepers, customs authorities) and represents the interests of the carriers vis-à-vis legislators and other national and/or international authorities. In addition, it provides regular briefings for its members and provides members with training courses and legal advice.

### About UIC

UIC is the worldwide organisation for the promotion of rail transport at a global level and collaborative development of the railway system. It brings together some 240 members on all 5 continents, among them rail operators, infrastructure managers, railway service providers, etc. UIC maintains close cooperation links with all actors in the rail transport domain right around the world, including manufacturers and suppliers of goods and services, railway associations, public authorities and stakeholders in other domains and sectors whose experiences may be beneficial to rail development. The UIC's main tasks include understanding the business needs of the rail community, developing programmes of innovation to meet those needs and preparing and publishing professional railway standards that facilitate the implementation of the innovative solutions. The train and education of the people called upon to use these innovative solutions is vital and the organisation of training schemes is a core component in ensuring the competency of tomorrow's generation of rail personnel. Representing rail with a wide range of international organisations such as the UN and cooperating with all organisations specialising in rail matters and transport issues right around the world is one of the prime raisons d'être of the UIC.

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