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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Transport - Intermodal Questions and Networks
Subject:	Passenger Package questions from Hungary – Intermodal WP 09.07.2026

Delegations will find attached the written questions from **Hungary** on the above subject.

Passenger Package questions from Hungary, part 1

PUBLIC

Rail Ticketing Regulation

- Would it not be appropriate to treat the sale of tickets covered by a public service contract and the discounts specified in the law separately from the sale of market-based tickets? Would it not be an unnecessary administrative burden to impose the same requirements on public services provided exclusively by a single railway undertaking as on competitive, multi-player services?

- In connection with the new measures of the Regulation, would there be a need to amend the complaint-handling mechanisms described in Articles 28 and 33 of Regulation (EU) 2021/782, e.g. so that a complaint related to travel can be submitted to both the ticket seller and the service provider, while a complaint related to the purchase of a ticket can only be submitted to the ticket seller?

- The conclusion of commercial agreements referred to in Articles 4 and 5 of the Regulation may be subject to public procurement. The logic of public procurement does not allow a company to contract with multiple partners for the same service and with everyone on the same terms, and the deadlines prescribed in the article cannot be met in a public procurement procedure. How does the Commission view this issue and what solution can it propose in the event of a public procurement obligation?

- To what extent is the 5-month ticket reservation sustainable in light of the annual schedule changes, track closure schedules, and operational schedule changes (e.g. accidents involving damage to the railway track and requiring a longer restoration time, force majeure events)? In the case of tickets falling within the scope of public services, we do not see the significance of the 5-month advance booking option, since for these tickets, even advance booking beyond 1 week is negligible in practice.