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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 Czech Republic – Intermodal WP 09.07.2026

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

Preliminary questions of Czechia on the Passenger Package

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The Czech Republic is grateful for the opportunity to share initial questions and concerns on the package and hopes that it will facilitate upcoming discussions.

Regulation on multimodal booking

How many MDMS providers does the Commission foresee to fall under requirements of this regulation? How many SMEs would be excluded from it?

Code-sharing/cooperation agreements are fairly common in rail and air transport and very often concern more than two operators. Can the Commission show how such journeys should be displayed in results shown by MDMS provider? Why is no definition of marketing transport operator or code-share arrangement included?

No payments clearing mechanism is included in the proposal. Is it up to individual agreements between providers and transport operators? Why was it chosen not to include it in the proposal?

Did the Commission explore the possibility to cap the take rate by the MDMS providers? The Interchange Fee Regulation could serve as an example that caps the fees issuing banks charge retailers' banks for processing card payments.

It is essential that the transport operator is aware of any previous or subsequent legs of the journey. However, MDMS providers are not obliged to pass that information to transport operators. Why is this obligation not included?

Railway Ticketing Regulation

According to Article 4 a railway service provider will essentially have to conclude a contract with a requesting online ticketing service provider.

Has the Commissison considered the situation where the railway service provider may not want to sell its tickets through a particular ticketing service provider for objective reasons?

These may refer to various situations, for example:

- the ticket sales service provider comes from a country with which there are complicated financial relations or generally complicated relations ("hostile country"),
- ticketing service provider sells tickets in a way that poses a reputational risk to the railway service provider (for example, does not properly provide information about train services, does not pass on information to passengers or does not download information about changes and closures in a timely manner; as a result the dissatisfaction of passengers is being borne by the railway service provider itself).

Regulation on railway passenger rights

Regarding Article 3, new point 9, 9a (definition of a through-ticket and a single-ticket), the regulation, through the new concept of a single ticket, creates uncertainty for railway service provider regarding the actual destination of the journey and the resulting responsibilities.

For example, a ticket vendor may sell a ticket for a route operated by various undertakings. As a consequence, a railway service provider A arranging transport for passenger on a short section from Prague suburbs (e.g. Prague-Běchovice) to Prague Main Station[1] may not know that it will be responsible for a single ticket to a destination in another Member State (e.g. Copenhagen, Denmark) operated by provider B. That can lead to significant consequences in case of a delay and a missed connection.

Is the proposal really intended to create a single travel document that covers, for example, a train journey within a city (or a short intercity journey) and a subsequent long-distance journey across several countries, with the rail provider operating the short part of journey (with a negligible fare) being responsible for the entire journey (at a much higher price)?

How should railway service providers who become part of the single travel document be informed about this?

Furthermore, this issue is also interlinked with the transfer times. Standard transfer times might be suitable for regular passengers travelling on short and frequent routes. On the other hand, for long-distance services operated just a few times a day, it would be advisable to have a longer transfer times, especially when the transfers are not guaranteed.[2] **Did the Commission explore the issue of transfer times in detail?**

[1] This section would be in scope of the regulation, as it does not represent a dedicated suburban network as suburban services are operated on a standard rail network.

[2] In some node stations, transfer times are set short deliberately. In case of delays, connecting trains either wait, or they are frequent enough not to create burden for passengers by missing the original connecting train. If we extend these times *en bloc*, it could unnecessarily prolong travel times for passengers and make rail transport less attractive.