MINISTRY OF TRANSPORT
AND COMMUNICATIONS, FINLAND

Postal address: PO Box 31, FI-00023 Government, Finland
Telephone: +358 295 16001, e-mail: kirjaamo@lvm.fi, www.lvm.fi

FINNISH VIEWS ON DATA AND TICKETING AT THE SUSTAINABLE AND SMART MOBILITY STRATEGY

– Delivering European multimodal mobility services

The European Commission has launched a public consultation in the context of the EU's mobility strategy. The implementing action plan contains Flagship 6 and 7 that include the means to making connected and automated multimodal mobility a reality. These flagship areas include:

- *measures relating to the revision of the Directive on Intelligent Transport Systems, including a multimodal ticketing initiative (action point 38)*
- *revision of Delegated Regulation 2017/1926 on multimodal travel information services to include mandatory accessibility of new dynamic datasets (action point 36)*
- *develop a common European mobility data space and establish a stronger coordination mechanism for the national access points established under the ITS Directive (action point 49)*
- *assess the need for regulatory action on rights and duties of multimodal digital service providers and issue a recommendation to ensure public service contracts do not hamper data sharing and support the development of multimodal ticketing services, together with an initiative on ticketing, including rail ticketing (action point 37)*
- *propose a new regulatory framework to open up access to car data to mobility services (action point 53)*

Planning for travel and buying tickets for trips combining different means of transport can be a problem for travellers in the EU. Multimodal digital mobility services, such as route planners or ticket vendors, can help in comparing travel options. These initiatives aim to improve such services by providing more data on all modes of transport. Finland welcomes these initiatives that aim to improve new mobility services by providing more data on all modes of transport.

General comments

Sustainable development depends on finding new models for value creation and building operating models that are based on high ethical values and human-centricity. Digitalisation and smart mobility offer vast possibilities to provide end users with better services and service levels. Interoperability and data mobility guarantee customers a real choice of service provider. This real opportunity for choice is a key part of creating a competitive data economy market and creating opportunities for innovation.

At the same time, seamless and smart mobility services help in meeting the challenges of climate change, in bringing systemic-level efficiency and in making better use of public and private assets. European-level action and the objective of making Europe climate neutral by 2050 are essential for Finland's national climate neutrality goals and its aim to harness digitalisation to better serve the needs and expectations of people and businesses. Developing mobility services also provides a means towards increased resource efficiency and a circular economy. Digital means offer the possibility to give consumers more information on the sustainability of different mobility options and to nudge them towards more environmentally friendly choices.

Unlocking the full potential of multimodal mobility

European-wide multimodal mobility requires unlocking the full potential of digitalisation and data. The framework should include all modes and both urban and non-urban areas as well as European transport corridors and mobility hubs. The interoperability solutions should also bridge passenger transport and logistics.

Mobility as a service, that is MaaS, is a prime example of multimodal and smart mobility. MaaS is a mobility service offered to a customer that brokers and integrates the services of different transport modes according to the customer's needs. Public transport is the backbone around which privately and publicly offered transport services are linked to build a door-to-door travel chain.

The potential of the MaaS concept, however, is not limited to urban areas only. It can also be used to **address long-distance travelling and to encourage a modal shift, especially on rails,** in which the urban area transport services can offer a solution for the last mile travelled. Building a functioning European-wide mobility market to master benefits of scale therefore requires **seamless interoperability for urban, rural and long-distance travelling solutions and for all modes**. To some extent, this interoperability framework also needs to encompass logistics to increase economies of scale and to unlock barriers that prevent the same vehicles, operators or applications serving all mobility and transport needs.

To create a multimodal mobility ecosystem, **all the different components of the transport system should be compatible across borders — meaning not only services, but also the related infrastructure, data sharing and regulations**. As stated in the staff-working document related to the Sustainable and Smart Mobility Strategy, the current challenges concerning data are slowing down the development of MaaS. The key issues and the highest priority are **the availability of and accessibility to relevant datasets in digital, machine-readable format and the interoperability of different systems (e.g. booking, payment, ticketing, authentication).**

Towards a common European mobility data space

Finland considers it important that access to data and trust in services is at the core of data economy policies for mobility. All key technological breakthroughs depend on the availability and free movement of data.

A **technology neutral approach** should be the starting point in harmonisation and when agreeing upon elements of interoperability. Such an approach will also ensure that service providers are able to respond dynamically to the changing demand and to find efficiency in their operational models between different market segments. For this reason, data-level and system-level interoperability have to be separated from the technology and have to use case-specific layers at both the regulatory level and in standards, specifications and soft law measures.

Technological neutrality is also reflected in solutions for connectivity. Openly standardised and commonly available communications services and networks should be used to enable the smooth operation of services in conjunction with other services and to meet the needs of users in their daily life.

A robust **digital economy is based on trust** shown by consumers in technologies, devices and applications related to the safe processing of data.

Trust in the reliable processing of data is a prerequisite for innovations and economic growth in a digital society. Against this background, it follows naturally that protecting the integrity and security of the EU, its member states and their citizens against data breaches and cyber threats has become a priority for the EU.

Therefore, when supporting technological innovation, new business models and competition through policy measures, we have to make sure that regulatory measures and standards also take into account security issues. To this end, the framework for smart mobility has to contain a documented approach for secured access and the authentication of data, along with mechanisms that will ensure that auditing the level of security is done in an independent and transparent way. Together, trust and transparency would provide a favourable environment for new business models and investments.

Data sharing at the core

Finland believes that balanced access to data of all parties, as well as symmetric requirements in relation to access and governance of data in respect of GDPR should be established through regulations binding on all operators. Therefore, Finland fully supports the aim towards the interoperability of data and ticketing systems as addressed in the Sustainable and Smart Mobility Strategy.

A key question to be tackled in this systemic change is the access to and sharing of data. All of the measures taken to develop digitalisation should be combined because of the need to produce, use and share digital data more effectively. This view is also supported by the EU data market study, which estimates that the growth achieved by the data economy will be faster than the average economic growth, provided that the situation develops positively in terms of digitalisation.

Decentralised data-sharing infrastructure requires interoperability. Data must be in machine-readable format, must be of good quality and, as far as possible, must be in real-time. Additionally, data must be shared between the parties, according to their various roles.

The **focus should be on the right to use data in a way that is balanced and symmetric**[1] so that all operators have the opportunity to compete fairly in the data market on non-discriminatory and equal terms.

[1]Finland's views on the Data Act have been expressed in a separate non-paper (attached). Finland has pointed out that even if data is collected in a single-actor system, usually many parties collect or contribute to this data. They should also have the right to access this data. This access can be subject to conditions as long as they are fair, reasonable and non-discriminatory. These are necessary changes; without them, the current situation of data collection by a few big players will not change. With these changes, this setup could be extended from digital services to all sectors. Namely, the utilisation of data is now an essential part of traditional services from car maintenance to logistics.

A right to data that is balanced and equitable includes:

- **Individual data portability rights** should be strengthened. Users should be given full control and portability of their data, while safeguarding their privacy. Data portability makes it possible for MaaS to offer roaming between several services, enabling a more competitive and diverse market.
- **Ensuring interoperability of ticket and payment systems**. Without facilitating the third-party sales of tickets, MaaS cannot provide customer-friendly services.

The objective is not in conflict with projects that seek to make existing local ticketing systems more widely available by creating account-based solutions, either regionally or nationally. However, even in these solutions it is essential to ensure that third parties remain the opportunity to convey tickets through API interfaces in order to achieve broader interoperability and roaming and accelerate competition in the transport services market.

Data governance model to support distributed data sharing

The data governance model being developed should enshrine the principle of human-centricity and thus must include an end-user perspective. The model should be developed in a flexible, sustainable and cost-effective way to support new forms of data-driven innovations and businesses as well as technologies. Both horizontal and vertical symmetry should be guaranteed.

Finland has a good common understanding of what kind of a data economy it wants to promote. We are actively working to create a new data economy that is based on the data governance model. In other words, a model in which data access is established through intermediary operators and the data is utilised by many different parties at the same time. In this model, the responsibilities, obligations, roles and joint coordination tasks that support operations are clearly defined.

The data governance model should not be built from a technical perspective. The aim is to get out of silos and create a seamless and interoperable data flow in the EU. Good governance also requires establishing cooperation to build best practices and soft law mechanisms such as rule books, codes of conducts and technical specifications. This work should be supported by multi-operator projects established through EU funding mechanisms (i.e. Horizon Europe, Digital Europe Programme and Collecting Europe Facility). Some of the outcomes from this work such as model APIs and QR codes could be elaborated as binding requirements through implementing regulatory acts.

Passenger rights in a multimodal transport system

In the transport sector, the legislation is still fragmented in silos, which has led to an outcome where different laws regulate different transport modes nationally. This fragmentation of legislation is hindering the functionality of cross-border services and raises barriers to providers of mobility services, not to mention the uncertainty that arises amongst end-users regarding passenger rights. **Multimodality should be taken into account when preparing regulations on passenger rights.** However, connecting the fragmented passenger rights by adding on a new layer of legislation of passenger rights on travel chains would most likely not add to the multimodality. In the worst case, it could do the opposite and further delay its development. Therefore, the revision of passenger rights regulation should be considered as a whole.

Contact person: Maria Rautavirta, Data Department, Data Business Unit, Director of Unit, maria.rautavirta@lvm.fi