

**European Commission**  
**Directorate General for Energy and Transport**  
**Rail Transport and Interoperability**  
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**Subject: Contribution of Altroconsumo for the Hearing on Rail Passenger Rights of the 15<sup>th</sup> of November**

Altroconsumo, independent consumers association, welcomes the Consultation Paper on the International Rail Passengers' Rights and Obligations brought forward by the Directorate General for Energy and Transport in preparation of an imminent Commission Regulation proposal in this field. While our written responses are going to be provided within the indicated term of the 24<sup>th</sup> of November, hereby we just expose some preliminary observation focused on the state of the Italian railway to serve as a contribute for the hearing of the 15<sup>th</sup> of November 2002.

1) First of all, we have to point out that **the intervened privatisation of the national railway sector implied a reorganization of the State Railroads Group** with the consequent legal separation of the company managing infrastructures - *Rete Ferroviaria italiana spa (RFI)* - the one in charge of the major 13 stations - *Grandi Stazioni spa* - and the one that provides railway services.

**In spite of this, the latter - *Trenitalia spa* - is still operating in a situation of monopoly of fact in which consumers are indeed deprived of any possibility to influence the quality of services by exercising an effective power of choice.** It becomes, therefore, crucial the individuation of a mechanisms through which consumers can exercise an effective pressure towards efficiency on *Trenitalia*.

2) In this perspective Altroconsumo during the last years has been asking for the implementation of **an adequate reimbursement scheme clear and easily available to passengers that, conjugating compensation and non compliance with quality standards, could finally render effective the customer satisfaction system foreseen by the Charter of Services.**

3) We have also criticized the customer satisfaction report brought out by *Trenitalia spa* the last 22 of March in occasion of its presentation of the

Charter of Services 2002 since in our opinion it does not reflect correctly the real state of satisfaction of passengers. Last year, on the 15<sup>th</sup> of October, in occasion of the hearing organized by this Directorate General we presented a classification of 133 complaints received by our association sorted according to the subject. This year regrettably the situation remains critic, **complaints received from our associates keep on being numerous and are still touching different items like punctuality, cleanliness of trains and stations, high fares and lack of information.**

4) Finally, although we would like to confirm here **our favour for the liberalization as well as for a strengthening of the competition in the sector of public services**, we have also to recognize that for the moment, with regard to railways services, consumers are not yet in the real condition to reap benefit out of it. Therefore, **a particular attention has to be devoted to the protection of passengers rights.**

5) **Together with the privatization we have assisted to a regionalization of the regional routes, the competences on which passed from the State to the Regions.** Altroconsumo has been closely monitoring such process in Lombardia where regrettably the regional administration decided in 2002 for a sensible increase of fares of 20%.

Such increases, moreover, did not correspond to an appreciable improvement of the services, which, for what it concerns the regional railways, need a **specific attention to the problems of the commuters like constant delays, overcrowded cars, and their unacceptable level of comfort and cleanliness.**

We appreciate in such sense the inclusion of punctuality and crowding parameters calculated on the single routes, as well as the **prevision of a bonus for commuters** of the routes where such parameters are not respected in the Service Contract 2002-2003 between the Region Lombardia and *Trenitalia*.

On the other hand we have to notice also that the **parameters levels do not correspond to high quality standard and the control on them entrusted to RFI (that, as already indicated above, is a company of the Group) is not a guarantee of impartiality** while a control carried out by a third company *una tantum* seems insufficient.

Best regards,

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