

INTERNATIONAL RAIL PASSENGERS RIGHTS AND OBLIGATIONS
CONSULTATION WITH THE COMMISSION AND THE RAIL SECTOR

15.11.02

VIEWS EXPRESSED BY EIM SECRETARY GENERAL

1. The Commission's concern for a Rail Passenger Charter is commendable, but should not be limited to the rail sector alone. The commitment to customer quality, with the costs that come with it, should apply to all forms of transport, not just the rail mode.
2. Legislating for quality is fine, but a voluntary commitment emanating from the industry is better, as increased commitment results.
3. Whilst the service commitment to the customer is primarily an issue between the Train Operating Company (TOC) or Railway Undertaking (RU) and their passengers, the Infrastructure Managers (IM) have responsibilities in this regard towards the TOCs and Rus and thus must participate in any discussion leading to legislative proposals.
4. Most TOCs/RUs in member countries already have customer-orientated schemes in existence, arrived at in response to customer demand. They vary from transmission of information about delays, dealing with complaints, to partial or full refunding of tickets or supply of vouchers against future journeys
5. Capture of information on delays lies mostly in the responsibility of the IM, but there are exceptions. Display of information about delays (national or international) varies in its sophistication from loudspeaker announcements to real time presentation on constantly updated displays. Policies on "customer comfort" in the event of delays varies from system to system.
6. EIM supports the Commission's (Jan 2002) proposal to encourage TOCs/RUs to develop voluntary service quality commitment. A proposal to put forward a Regulation requires detailed consideration. The voluntary approach is recommended. If any Regulation is adopted it should be directed at the whole transport industry, not just rail. Once more, best customer treatment will stem from a voluntary commitment from within the industry.
7. The paper draws attention to a lack of cross-border Regional initiatives, but fails to recognize the examples of the Oresund Bridge and the services around Basle, to name but two.
8. The paper is LONG on legal contracts enshrined in COTIF and CIV, but SHORT on the voluntary schemes applied by operators to recognize service shortfall by the issue of either refunds or vouchers for future travel. In many cases these schemes are underpinned

by support from IMs in their relationships with TOCs/RUs. The EIM Association has three members who are operating Performance Regimes with their TOC/RU customers and other EIM Members are exploring these. EIM has actively supported the Commission in its research into Performance Regimes, and remains favorably disposed to an international approach to such schemes.

9. Although primarily an issue for TOC/RUs, the question of quality monitoring must take into account practical issues. These may include the differences of service operation at peak times in major cities from those of off peak services. No generalized scheme should be envisaged that has little chance of realisation of improvement. Any such scheme should encourage improvement in service rather than simply penalise failure. It would be absurd to penalise a rail service failure in the “rush hour” if no similar action were taken to unblock a clogged road, motorway or airport.

10. Measurement and recording of train movements is the staff of life to IMs, whether the train is a national or international one. This does not have to be reinvented, it exists.

11. Inevitably, rail infrastructure needs to be maintained and worked on. Any future Regulation must allow for this and such activity must not be made more expensive by the existence of such a Regulation.

12. The paper, surprisingly, includes reference to the difference between national and international prices. This seems to the writer to be out of place and more appropriate to the future debate on access charging.

13. The paper comments on the need for contingency plans for major disruptions. All EIM member systems already do this.

14. All EIM member systems, where they are responsible for passenger stations, study and implement improvements for “PRMs”.

All members of the European Rail Infrastructure Managers’ Association are committed to service improvements for their customers, the TOC/RUs. It is this group that is at the front rank in the relationship with the rail user, but EIM supports the call for a voluntary agreement and commitment to passenger quality.

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