



**NAPCORE Position paper on the revision of
the delegated regulation on multimodal
travel information services (EU) 2017/1926
(DR MMTIS)**

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[NAPCORE](#) is the coordination mechanism to improve compatibility of the National Access Points (NAPs) as public cornerstone of European mobility data exchange. NAPCORE is a project supported by the Connecting Europe Facility of the European Union and the European Commission and a partnership of NAP operators and National Body representatives of all European Member States (and beyond). NAPCORE's goal is to improve the interoperability of mobility related data in Europe with mobility data standard harmonization and alignment. NAPCORE sets out to empower NAPs by defining and implementing common procedures and strategy, strengthening their position and supporting steps towards the creation of European-wide solutions to better facilitate the use of EU-wide data.

The directive on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport (2010/40/EU, so-called ITS Directive) has been crucial in the creation of the NAPs for intelligent transport systems. Particularly, the priority actions in article 3 concerning the development and use of specifications and standards, which in consecutive years have been regulated by delegated acts have been of great importance. Most of these acts have required Member States to set up a NAP to facilitate data exchange and re-use, including for the provision of EU-wide Multi-Modal Travel Information Services (MMTIS). This delegated act (1926) published in 2017 is nowadays somewhat outdated, and a revision driven by the European Commission is ongoing.

This position paper expresses NAPCORE's common view on the revision of the delegated regulation on multimodal travel information services "DR MMTIS" (EU) 2017/1926, supplementing the ITS Directive. This position paper has been written while NAPCORE did not have access to the draft proposal of the European Commission, so it was based upon oral explanation by one of the Commission's policy officers.

Positive attitude towards this revision

As has been expressed in [NAPCORE's Statement Paper](#) on the revision of the ITS Directive, NAPCORE is enthusiastic to contribute in the important work undertaken in the delegated acts.

NAPCORE welcomes the revision of the DR MMTIS. Let us take this opportunity to implement lessons learnt during the first five years of its implementation, acknowledging that those lessons learnt and recommendations on possible solutions and steps forward are under examination within NAPCORE. Such a revision is also the right time to keep up with developments in the field, and to incorporate new insights and emerging practices and applications, which is certainly relevant in the rapidly evolving world of data and digitization.

NAPCORE fully supports the intention of the European Commission to make dynamic data mandatory, due to their great added value in providing efficient travel information services.

The update of the delegated regulation means in the first place an extension of the current list of data categories to be made available via the NAP. This should further facilitate service providers developing multimodal information services. NAPCORE welcomes the fact that, as a consequence, the potential interest for NAP users may increase significantly. As a result, the efforts made by governments, NAP operators, and data owners to achieve a high-quality NAP will be more profitable. By increasing the availability of data on NAPs and simplifying the re-use of data, NAPCORE sees good potential in positive effects on the ITS ecosystem.



Points of attention

Based on the impact of the implementation of the current DR MMTIS, NAPCORE raises a number of points of attention when drafting the revised DR:

1) *Data should be of interest to users, necessary, and of high quality*

Both individual NAPs and NAPCORE see it as their job to fulfill user needs for data the best possible way.

Our starting point is to make data available that meets data users' specific needs, and, finally, those of travelers. Data made available that is not picked up by the users makes no sense. The same applies when data is made available in an inaccessible form or in other data standards than is agreed on in the sector. NAPCORE aims to provide the public-private table to contribute to increase the provision of data, its interoperability, and to work on quality criteria.

Quality of data is a major concern as well, as it determines the quality of the services re-using that data. The timeline of making additional data categories mandatory has to take into account how quality is often only achieved after a running-in period. When data is only available for parts of the network or for some types of vehicles, the traveler information risks being insufficient or not accurate enough to meet the traveler's expectations. Furthermore, this insufficiency could lead to wrong interpretation and misleading information.

So data categories added to the DR must be really useful and be made mandatory when their quality reaches a defined (minimum) level.

Finally, we recommend not to include data categories in DR's annex that can be generated by data re-users. An example from the current DR MMTIS is point 1.3. (d) *Trip plan computation: 'Estimated travel times by day type and time-band by transport mode/combination of transport modes'*. Where it concerns a combination of transport modes, such data has to be derived from data made available by several data holders (including by infrastructure managers), which is typically a task belonging to the service provider of multimodal travel information.

2) *Each data category needs a clear definition*

Clearly defining what is meant by each data category is a very valuable point of this revision which contributes to the uptake of this regulation. It is important to define the data categories in the annex properly to avoid discussions on exactly which data should be made available. This point is especially important when adding new definitions as is foreseen by introducing observed data, and its difference with historic data. Data category definitions should correspond to the definitions provided by the recommended data standards. Defining data should also include which type of data holder is responsible for making the underlying data available.

An example from the current DR MMTIS is point 1.3. (d) *Trip plan computation: 'Parameters needed to calculate an environmental factor such as carbon per vehicle type or passenger mile or per distance walked'* raises several questions regarding the data holder, the requested dataset and how the data is to be used and interpreted.

3) *Only impose data standards which meet deployment principles*

Regarding data standards, when adding new data categories to the DR, it is important to check which data standards are currently in use. In consultation with the experts, preference should be given to those standards that have already proven their usefulness, which are easily applicable and enable harmonization. Moreover, standards required by the DR should be freely available. It is recommended to check for each proposed standard whether it complies with the principles for specifications and deployment of ITS, as mentioned in annex II of the ITS Directive, e.g.: be effective; be cost-efficient; deliver interoperability; support backward compatibility; facilitate inter-modality; respect coherence. *Facilitate inter-modality* is a key principle for this regulation,

where standards and converters should support its main objective to maximize the full potential of multimodal travel information (and thus, *being effective* by making a tangible contribution towards solving the key challenges affecting road transportation in Europe, such as reducing congestion and lowering of emissions).

Ideally, it is possible to fall back on European profiles that are sufficiently elaborated so that it is not necessary to convert them into national profiles. A modular approach should be foreseen for those countries which prefer to develop more elaborated profiles. Likewise, a single, standard format for MMTIS data source has the preference over a patchwork of interoperable formats. The latter raises a number of questions, such as to what extent alternative standards meet the same functionalities as those mentioned in the DR, and by who and how is decided whether the principles of interoperability and backward compatibility are complied to.

Where standards do not yet exist, it is crucial to create them in the appropriate working groups once the revised DR has been adopted. One major gap in standardization at the moment is in the form of data exchange of shared mobility.

Implementation of the revised regulation's annex at Member State level should not be imposed until there is an agreement on the data standards to be used. By doing so, we avoid unnecessary costs and efforts, and a development on the ground resulting in internationally incompatible standards. NAPCORE is happy to contribute to this wherever possible.

As the NAPs present themselves as the backbone of the European Mobility Data Space, NAPCORE stresses how NAPs are built upon European standards and reference data formats, and that they are conceived to encourage European interoperability. If other building blocks of the Mobility Data Space appear on similar matters but with own rules and principles, its interoperability could be harmed, both across countries and across transport modes.

4) *An opportunity to foster the shift to a more sustainable mobility*

A final note, though not immediately linked to NAPCORE's activities. The DR MMTIS aims to efficiently integrate the shift to sustainable modes of transport, thanks to the alternatives to private car use into one application for the traveler. Without further incentives towards facilitating inclusive, multimodal, sustainable transport and mobility solutions, there is a risk that the implementation of the DR will mainly lead to digital support for car users. Indeed, data availability and quality will improve for all modes (for example, thanks to the data on aviation, car-parking and the real-time availability of taxi services), and will facilitate both multimodal travelers, as well as users of less sustainable modes. The rules on re-using data from the NAPs affect the results of multimodal travel information services, and current rules in the DR might be supplemented by specifications or instructions on how those data can be used corresponding to the Green Deal and Europe's climate ambitions.

In a broader perspective as well, specific governance mechanisms should be put in place to prevent any misuse of data (as defined by e.g. the GDPR and the Charter of fundamental rights of the EU), and enable effective remedies to ensure that MMTIS serve the common good.

Ask for support in the implementation of the revised DR

When drafting this revised DR, the Commission should take into account the costs and human resources necessary to make the relevant data available with a sufficient level of quality. In order to ensure that those costs and resources are bearable, in particular those incurred by public authorities, they should be beneficial and considered cost effective. The Commission should also consider the additional costs incurred on private operators as well as the administrative burden associated with providing this data.



Recommendations from NAPCORE on a harmonized development of NAPs in the most ideal conditions will follow by the end of 2024 at the latest, but it is clear that in addition to NAPCORE and specialized organizations such as UITP and ITxPT, there is also a role for governments at all levels. NAPCORE requests the European Commission, if the revised DR is approved, to take action to support the implementation of the new regulations. In particular, NAPCORE asks:

a) *To invest in national deployment and compliance with the revised DR*

NAPCORE asks the Commission to provide grants so that NAP operators and data owners receive a large amount of financial assistance to make the significant costs bearable, as has been the case with the implementation of the current DR.

Following the experience with the current DR, it mainly concerns personnel costs (internal or outsourced) to make the data available. In addition, the expansion will of course also entail a greater workload for NAP operators and National Bodies.

Costs for maintaining and storing the data – with increased costs for energy supply and cybersecurity – should not be underestimated neither.

From a cost perspective, it is advisable to limit any new data categories and obligations when drawing up the regulation to what is really necessary and contributes to the end goal.

b) *To invest in data standardization and tooling*

As stated earlier, the imposition of data standards should be carefully considered, based on an analysis that starts from efficiency and efficacy considerations regarding data owners and users. Standardization of data is an essential prerequisite for data exchange and reuse in an international and intermodal framework. Taking the number and diversity of data holders into account, it is of high importance that the European data standards are available free of charge, which usually is not the case at the moment.

NAPCORE invites the European Commission to investigate what kind of support will be most cost-effective. By making standards freely available at an European level, there is a good chance that private partners will invest in tooling, and public efforts would only be necessary if private initiatives lag behind.

Conversion of data contributes to feed systems supporting other data formats, thus supporting legacy. However, a mechanism would be useful to validate potential conversion tools and related mappings, to preserve full functional scope and to avoid confusion.

Additionally, in order to ensure interoperability between the data of different modes, the EC could encourage to incorporate the agreed standards in tenders.

c) *To invest in information, education and training*

Investments in information events are useful in order to raise awareness on the regulations imposed by the MMTIS DR and possibly additional national legislation or instructions. There are good reasons to believe that NAP operators and national authorities should support the data owners in making their data available. This task obviously entails specific resources as well. Indeed, data owners need education or training on the correct use of data standards and conversion tools.

According to the principle of 'train the trainers', NAPCORE prefers an initiative taken up at an European level, so that the participants can afterwards give training in their Member State. An European platform dedicated to individual training with training materials and a certification of the trainers could be developed. Other solutions might be needed for technical matters, addressed at target groups with a higher level of expertise. Written documentation and training material, made available via a website, is also desirable. The European Commission could give a mandate for this documentation to be drawn up and translated into all languages. For the duration of the project and corresponding to the Grant Agreement, NAPCORE may take on certain sub-tasks.