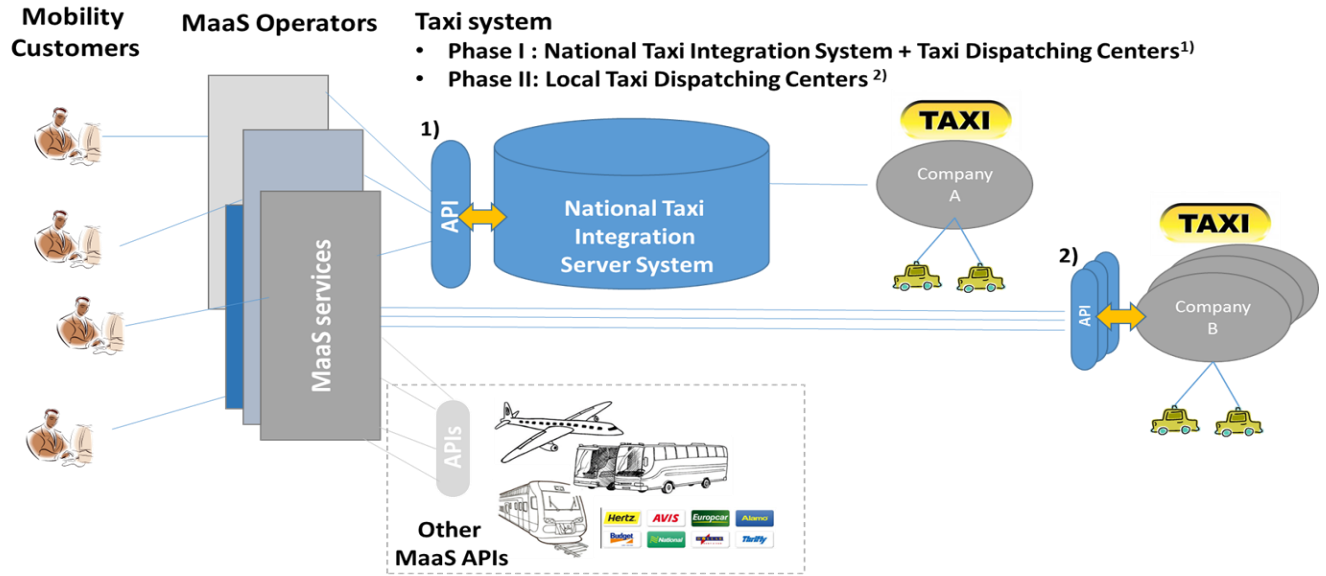


Legal Aspects to MaaS

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Taksiliitto & Taksiliiton Yrityspalvelu Oy

- Suomen Taksiliitto ry (The Finnish Taxi Owners' Federation) represents the interests of the taxi sector in Finland. The association owns a limited company that provides a taxi API for MaaS services.
- Finland:
30 dispatching centers,
10 000 taxis



There is no common definition for Mobility-as-a-Service

1. Travel chains

- An operator expands its service and offers additional connections or other services valued by the customer.
 - In Finland, the national railway operator, VR, is hard at work to offer door-to-door travel chains. Travel chain pioneer in the Helsinki region.
 - In time, this type of services might evolve to packages that contain mobility + other services, for example a movie package that contains movie tickets and transport to the theatre.

2. Mobility package

- A completely new brand that gathers mobility services into a subscription package.
 - In Finland, MaaS Global offers a service where the customer can buy a monthly package of public transport, rental car services and taxi rides.

There is a lot of legal uncertainty in multimodal travel chains

- Fragmented legal base
 - Each transport mode has sector specific rules
 - Sources: national rules, international conventions and EU law
 - General principles of consumer protection and contract law
- There are no common rules on compensation and damages.
- MaaS operators are not liable if they act as intermediaries or agents
- Multimodal travel chains are not covered by any legislation: no rules on rerouting or assisting when transferring between modes

We need clear rules on passenger rights in a multimodal travel chain

- The rights of passengers vary between transport modes, but also based on who pays for the ticket (consumer or business traveller)
- There is little legislation addressing MaaS operators. Depending on the contract base and the services they provide, MaaS operators can be classed as:
 - Intermediaries (offering a platform for service providers and clients to connect)
 - Agents (making contracts on behalf of a service provider)
 - Travel organisers (Dir. 2015/2302 on package travel and travel arrangements)
 - Ticket vendors (Reg. 1371/2007 on rail passengers' rights and obligations)
 - Mobility service providers (assumes responsibility for the whole service)
- Should MaaS operators be under obligation to keep the passengers informed about changes or delays?
- What passenger information can MaaS operators communicate to the transport service providers?
- Do you have to be a risk taker to buy a travel chain ticket?

We should ensure the accessibility of new mobility services

- Sector specific rules on accessibility (ticketing services, platform accessibility, assistance in getting on and off the vehicle)
- There are no rules on how MaaS operators should communicate accessibility information to passengers
- There are no rules on how MaaS operators should inform service providers about a passenger's need of assistance
 - Sector specific legislation may have rules on ticket vendors' obligation to notify operators or provide assistance to disabled persons and persons with reduced mobility
 - Transport service providers may be under obligation to provide assistance to persons with reduced mobility
 - Should there be legislation to ensure smooth transit from one mode of transport to another, for example from train to shared taxi, if the service is bought as a package? Is this something the market can take care of?
 - Should MaaS operators be obliged to reroute a travel chain if one link in the chain cannot provide the requested level of accessibility?
- Should legislation ensure that MaaS is available to passengers who cannot use digital services?

General remarks from an operator perspective

- For MaaS operations to prosper, access to publicly funded data should be ensured. In Finland, several databases have already been opened for commercial use:
 - Digiroad: national database that contains road attribute data of the Finnish road and street network
 - Rakennus- ja huoneistorekisteri: database containing address information of built environment
 - National Land Survey's maps and spatial data
- Public transport ticketing and timetable data should be open and available for commercial use, but relationships between private operators should be based on freedom of contract.
- To form trust in new services, passenger rights legislation should be harmonised across transport modes. The rights and obligations of MaaS operators should be clearly established.
- MaaS should not be confused with concepts such as sharing economy and circular economy.