International Rail Transport Committee
Comité international des transports ferroviaires
Internationales Eisenbahntransportkomitee

17/06/2025

Open Sales and Distribution Model (OSDM) within the Telematics TSI Revision Process

On behalf of the CER, UIC and CIT, we are writing to express our serious concerns regarding the latest TSI revision (EN09) and its associated technical documents. Our shared mission is to increase public transport travel within Europe and ensure seamless, efficient ticketing for all travelers. However, as it stands, the current TSI proposal threatens to undermine this goal and risks significant negative consequences for the sector and its customers.

Our Commitment to Interoperability

Over recent years, the sector, CER members, UIC and retailers have invested heavily in developing the OSDM standard. OSDM replaces outdated proprietary interfaces and supports all types of long-distance rail (but also multimodal) products across Europe, making it easier for distributors to build and offer comprehensive rail portfolios. Achieving interoperability between local and long-distance systems is a shared objective, but it requires understanding the differences between standards and working towards solutions that benefit all stakeholders.

Key Concerns with the current TSI Process

a. **Lack of Collaboration:** Throughout the TSI revision, the process has been one-sided, expecting CER members to adapt to the NeTEx model, which is not fit for long-distance or cross-border distribution. This threatens true interoperability and imposes high adaptation costs on carriers. Due to the changes brought about by the TSI which are possibly substantial, this may raise legal procedural questions.

b. **Insufficient Consultation and insufficient impact assessment:** Essential sector knowledge was not fully utilized, leading to misunderstandings. The TSI text is difficult to interpret, and effective communication between DG Move/ERA and the sector has been limited. The results of the impact assessment were not shared with the sector up front and the sector does not agree on the conclusions.

c. **Hasty Changes:** The rapid inclusion of new untested immature models (such as the recently introduced OMSA) and the exclusion of OSDM for years have left little time for thorough review, risking unintended consequences.

d. **TSI-TA-Act and Annex, ERA-Technical Documents:** we are convinced that the TSI-TA-Act and -Annex as well as the ERA Technical Documents shall represent a homogenous, final and stable package (as the TSI-TA foresees a totally new way of working), which is not the case at all for today. This shall be considered when voting in the RISC-Meeting.

e. **Recent Talks:** While recent discussions have led to some improvements, major points of disagreement remain unresolved or even further deteriorated.

Technical and commercial concerns

1) Issues with NeTEx Implementation on top of OSDM posing a red line for the sector:

   a. **NeTEx as non-Uniform Standard:** NeTEx is implemented differently across Europe, lacking a unified profile, both for timetabling and fares. This complicates cross-border ticketing and requires significant coordination before it can support all European rail products. For example, bridging the gap between Norwegian and Swedish implementations has revealed fundamental model differences.
   b. **Non-Scalable Model:** If Distributors want to use the NeTEx model, they must download large data volumes from multiple National Access Points (NAPs), develop their own pricing engines, and often rely on local expertise—making the system inefficient and difficult to scale. We expect large scale file sharing will find limited use, therefore producing it is a disproportional burden for carriers (see remark on "act 3 (38) (b) act 6 (3)" and "ACT 6.3" in the Excel sheet and the graphic below)
   c. **Questionable Claims:** Assertions that NeTEx is suitable for all European long-distance rail are misleading. The Norwegian implementation is limited in scope (<20 transport authorities vs more than-400 having Rail competences and 10,000 across Europe including public transport), uses a different profile, and does not cover all European product variants. Moreover, the ontologies coming from public transport are not compliant with operational rules used in rail sector, especially for fares.
   d. **OSDM-Advantage**
      i. **Simplified OSDM-Implementation:** OSDM allows all relevant information to be provided directly by the rail undertaking upon request, minimizing data collection and eliminating the need for complex local expertise.
      ii. **Proven Solution:** OSDM is already operational or under implementation and supports diverse, cross-border product models efficiently.

2) **Incomplete Technical Documents:** The ERA ontology is not yet suitable for the full scope of technical documents. Until full alignment is achieved, the OSDM ontology should remain recognized.

3) **Outdated References:** Several technical documents still refer to outdated standards. The Change Control Management (CCM) process must be resumed and improved to reflect sector developments

4) **Commercial Sensitivity:** The proposal requires sharing commercially sensitive fare data (including minimum and maximum prices) in bulk, which is unacceptable and disproportionately burdensome. (See remarks in excel sheet "annex 4.3.1 (2)")

5) **Distributor Roles:** The TSI TA proposal currently allows distributors to sell a carrier's offerings based on either a legal right **OR** a contract. For open-access carriers, a commercial contract must always be required to protect business interests. (See remarks in excel sheet "ACT art 3 (38) (a)".

6) **Definitions:** Concerns regarding the definition of "offer" and its PRR implications (see remarks in excel sheet "ACT art. 3 (44)")

7) **Fees:** Fees for value added services should be allowed (See remarks in excel sheet "ACT art. 6.1").

Consequences if TSI TA proposal adopted at this stage

1) **Commitment to a not-fit-for-purpose and costly ticketing architecture, sunk cost for investments,** which have already been done for a long time (an entire depreciation period). Due to TSI-TA- fare pre-loaded model, the millions of investments and 10 years of effort done by Railways, IT providers and Distributors in their own distribution systems and in OSDM in a fine-tuned sales process (peer to peer) to be ready to manage a very dynamic and competitive market will be jeopardized. Furthermore, billions of tariffs (for reference only) will need to be shared/transported making the proposed file sharing model disproportional and not scalable at European level for both railways and distributors.

2) **Extra cost for distributors**. Following our estimation each ticket distributor, using the NeTEx model for cross border, would face an investment of €328,000 per year, which would force them to sell over 146,000 extra tickets per year just to break even — jeopardizing smaller players.

3) **High negative environment impact:** Due to the very extensive data exchange foreseen by the TSI-TA proposal at EU scale a generation of additional 8,640 tons of CO_2 annually is expected, equivalent to 14 years of Paris–Frankfurt air traffic — not in line obviously with the EU's Green Deal and modal shift objectives.

4) **No added value** for the Member States/Passengers/Taxpayers, who will have also to finance the TSI TA architecture.

5) **Black box adoption of legislation** based on not yet finished/agreed/ready technical documents.

6) **Interference with commercial business (not the case for other transport modes):** in view of the possible negative effects of an unnecessary and unbalanced ticketing regulation on the business models of railways, however, there is a big risk that rail in Europe might ultimately not be strengthened but weakened.

Sector view on possible actions

- **RISC Voting: CER, UIC and CIT recommend not voting in favor of the Implementing Regulation at the RISC meeting in July unless the points raised above are clearly identified as Open Points.** This will allow further development with all stakeholders to create a workable, future-proof proposal allowing OSDM to be an interoperable standard.
- **Recognize Two Coexisting Models:** Support both NeTEx and OSDM within the TSI framework, ensuring real interoperability by sharing a common ontology, to meet the different needs of the sector ensuring nobody will have to invest twice. This is the purpose of CEN / CENELEC works, aiming to define European and Fares profiles.
- **Support a Collaborative Approach:** Encourage genuine compromise from DG MOVE/ERA to avoid undermining rail competitiveness and ensure balanced, interoperable ticketing.
- **Resume Effective CCM Process:** Ensure technical documents are up to date and reflect the latest sector developments.
- **Pursue Multimodal Data Models:** Ensure that the architecture supports true multimodal and cross-border travel. All relevant stakeholders should be represented in this process.

Conclusion

We are convinced the TSI-TA-EN 09 is not mature for a positive vote. We are committed to building a balanced, interoperable, and future-ready ticketing system for Europe. We welcome a constructive dialogue and are prepared to collaborate with the Commission, ERA and all stakeholders to reach this goal, provided the process is open and inclusive. Thank you for your attention and your ongoing efforts in shaping the future of European rail transport.