

Public consultation on the evaluation of the Regulation on a Code of Conduct for Computerised Reservation Systems

Fields marked with * are mandatory.

Context and purpose of the consultation

The Computerised Reservation Systems (CRS) Code of Conduct establishes a regulatory framework for market participants in the market for CRSs. It applies to any CRS in so far as it contains air-transport products. The CRS Code of Conduct also applies to rail transport services distributed in a CRS which is also distributing air transport tickets. It does not apply to "rail only" services.

CRSs act as technical intermediaries in a market of a two-sided nature, connecting travel services providers, such as airlines, on the one hand and travel agencies/large corporations on the other. Airlines and railway operators provide CRSs with information on their fares, schedules and availability, while CRSs provide the airlines with booking capabilities and a distribution channel. CRSs provide travel agents with reservation, booking and ticketing services by means of a comprehensive tool which allows comparison of prices and conditions from participating carriers. They permit travel agents to make immediate confirmed reservations on behalf of its customers.

This public consultation is designed to support the evaluation of the current Regulation. The European Commission published on 5 October 2017 an [Evaluation Roadmap](#). The Roadmap provides more information about the evaluation process and the topic in general.

Fields marked with * are mandatory.

The survey contains four sections:

- A. General information about the respondent
- B. Respondent's experiences with booking services
- C. Evaluation: Questions on the relevance, efficiency, effectiveness, coherence and EU-added value of the CRS Code of Conduct
- D. Further information

A. General information about the respondent

* 1. You are welcome to answer the questionnaire in any of the 24 official languages of the EU. Please let us know in which language you are replying:

English

*2. Are you replying on behalf of an organisation:

- Yes
 No

2.a. Please identify clearly what organisation you represent?

100 character(s) maximum

The Netherlands Association of Travel Agents and Tour Operators

2.b. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

- Yes
 No

2.b.1. If you answered "yes" to question 2.b., please enter your organisation's registration number in the Transparency Register (numbers only)

100 character(s) maximum

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2.c. Which of the following categories best describes your organisation's main activity?

- Public authority (EU, national, regional or local)
 CRS/ CRS association
 Airline/Airlines association
 Travel agency/Travel agency association/Tour operator
 Technology provider (i.e. IT providers, aggregators)
 Meta search engine
 Research/Academia
 Consultancy
 Consumers/Air passengers association
 Company active in the aviation sector other than above (please specify)
 Other (please specify)

*3. Please provide your full name:

100 character(s) maximum

Walter Schut

*4. Please provide your email address in case we have questions about your reply and need to ask for clarifications. If you do not have an email address or do not wish to be contacted by us for further clarifications, please write "Not available".

100 character(s) maximum

ANVR The Netherlands Association of Travel Agents and Tour Operators

*5. Please indicate your country of residence:

Netherlands

In order to ensure a fair and transparent consultation process, only responses received through this online questionnaire will be taken into account.

Contributions received are intended for publication "as submitted", that is, respondent by respondent and question by question, on the Commission's website. Below, you have the possibility to indicate whether you agree to the publication of your individual responses, and whether you prefer the responses to be published under your name or anonymously.

Furthermore, the Commission will prepare a synopsis report summarising all responses received (including those by respondents not agreeing to the publication of their answers).

*6. Your contribution

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N°1049/2001

- can be published with your personal information (*I consent to the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication*).
- can be published provided that you remain anonymous (*I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication*).

B. Respondent's experience with booking services

Section B should not be answered if you are answering this survey for a "CRS/CRS association", "airline /airline association", "travel agency/travel agency association", "technology provider" or "meta search engine" (see question 2).

*Do you want to answer this section?

When clicking yes, the questions related to this section will appear. Please, allow a few seconds for the system to generate the questions.

- Yes
- No

C. Evaluation questions on relevance, efficiency, effectiveness, coherence and EU-added value of the CRS Code of Conduct

In order to answer some of the questions in this section, more specific knowledge of how the different booking channels operate may be needed. You may choose to skip entirely this section or to reply 'No opinion / I don't know' to the questions you feel unable to answer.

*Do you want to answer this section?

When clicking yes, the questions related to this section will appear. Please, allow a few seconds for the system to generate the questions.

- Yes
- No

C.1. Questions on relevance

* 15. Based on your experience, how much has the way you book air tickets changed over the past 10 years?

- Completely
- Significantly
- Slightly
- Little
- Not at all

* 16. Do you agree with the following statements?

	Agree	Undecided	Disagree	No opinion / I don't know
Changes in the way you book air tickets are mainly due to new technological developments in the online sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in the way you book air tickets are mainly due to changes in the commercial strategies of market participants (i.e. airlines selling directly tickets)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in the way you book air tickets are mainly due to the presence of new travel agents selling online	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in the way you book air tickets are mainly due to the presence of metasearch websites	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 17. In your view, which are the main changes in the way you book air tickets? You may refer to the options listed in the previous question or other changes.

3000 character(s) maximum

Ticketing more complex due to more options included/excluded in the price.
 More choice but sometimes not all options available for agents

* 18. Since the entry into force of the CRS Code of Conduct, the airline ticket distribution market was affected by several technological and market developments, such as for example:

- Airlines increasingly unbundle their products meaning that consumers can choose whether they want to include extra services like seat reservation, food, luggage check-in etc.
- With increased access to the internet for consumers, alternative distribution channels such as airline's own websites and alternative sources of flight information such as meta search engines, i. e. websites which compare products from different suppliers, as well as alternative offers for the products of the same supplier, have become more important;
- Airlines have divested themselves from CRS ownership.

In your view, considering the technological and market developments, are the provisions of the CRS Code of Conduct listed below still relevant today?

	Yes	No	No opinion / I don't know
Principle that access to CRSs by airlines and travel agents is free from unfair and unjustified conditions (Articles 3 and 6).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for each system vendor to provide a principal display or displays for each individual transaction through its CRS and to include therein the data provided by information they obtain from participating carriers in a neutral and comprehensive manner and without discrimination or bias (Article 5).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for all participating carriers to provide accurate data (Article 9)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for parent carriers (i.e. an airline that owns a CRS) to provide the same information on schedules, fares and availability to other CRSs than they provide to their own CRSs. (Article 10).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for CRSs to observe equal treatment when making marketing, booking and sales data (Market Information Data Tapes - MIDT) available to participating carriers.(Article 7).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prohibition for CRSs to identify travel agents in MIDT unless the travel agent and the CRS agree on the conditions for the use of such data. (Article 7(3)).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The specific requirements addressing the protection of personal data of customers in Article 11, supplementing the requirements of the EU's General Data Protection Regulation (Regulation (EU) 2016/679).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for a CRS, in case train services for the same city-pair are offered on the CRS, to feature at least the best ranked train service on the first screen of the principal display. (Annex I, point 9).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 19. Based on your experience, are there any issues which the CRS Code of Conduct currently does not address but that should be addressed?

- Yes
- No
- No opinion / I don't know

* 20. Article 2, point 4 of the CRS Code of Conduct defines a CRS "a computerised system containing information about, inter alia, schedules, availability and fares, of more than one air carrier, with or without facilities to make reservations or issue tickets, to the extent that some or all of these services are made available to subscribers".

Based on your experience, does this definition cover all cases requiring to be covered and is it confined to those cases?

- Yes
- No
- No opinion / I don't know

C.2. Questions on effectiveness

The evaluation criterion of effectiveness considers how successful EU action has been in achieving or progressing towards its objectives. The objectives of the CRS Code of Conduct are listed below.

* 21. Based on your experience, to what extent was the CRS Code of Conduct successful in achieving these objectives?

	To a great extent	Somewhat	Very little	Not at all	No opinion / I don't know
To ensure a level playing field for all participating carriers in respect of their treatment by the system vendor.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To prevent distortion of competition between CRSs by parent carriers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure equal treatment of airlines and railway operators when these acquire marketing, booking and sales data (MIDT data) and prevent abuse of such data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To increase transparency on travel options for travel agents and consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consistency across the EU in respect of data protection in the course of the activities of system vendors and subscribers.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To promote rail transport and inter-modal transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 22. The CRS Code of Conduct obliges the CRSs to show an unbiased display to the travel agencies, which subscribe to them. Do you feel confident that those travel agencies give the same information to consumers?

- Very Confident
- Confident

- Moderately Confident
- Slightly Confident
- Not Confident

Please explain your choice

3000 character(s) maximum

Agents want to inform travellers in a neutral way and give them all the options available. In this way the travellers thrust the agent. Consumers need an independent source of information about prices, conditions and travel options. They can't get this from individual airlines or comparing airlines.

C.3. Questions on efficiency

When deciding to introduce a sector-specific regulation, the EU faces the challenge of balancing the potential benefits of such a regulation against the potential costs of such a regulation. For the CRS Code of conduct, these costs include direct costs incurred by the CRS providers (compliance and administrative costs), national authorities (enforcement costs), travel agents, and airlines.

* 23. In your view, do the benefits of the CRS Code of Conduct overall outweigh its costs?

- Yes
- No
- No opinion / I don't know

Please explain your choice

1500 character(s) maximum

C.4. Questions on coherence

The evaluation of coherence involves looking at how well or not different actions work together. In the case of CRS Code of Conduct, there are a number of other EU legislations and policies affecting airline ticket distribution. While these texts do not explicitly regulate CRSs provisions contained in these texts they might nevertheless have an effect on ticket distribution.

* 24. Based on your experience, do you think the provisions of the CRS Code of Conduct are coherent with the policy approaches or objectives underlying the following initiatives?

	Yes	No	No opinion / I don't know
The EU's 2015 aviation strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

The Commission's Digital Single Market Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission's aim to achieve more multimodal traffic information and ticketing systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Directive 2010/40/EU of the European parliament and the council of 7 July 2010 on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
EU competition rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission's consumer protection policy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU's General Data Protection Regulation (Regulation (EU) 2016/679)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please substantiate your reply. In particular please indicate, in respect of any item listed above for which your answer has been "no", the policy approaches or objectives with which, in your view, the provisions of the CRS Code of Conduct are not coherent and explain why.

1500 character(s) maximum

C.5. Questions on EU-added value

In any policy initiative, the Commission must consider whether there is added value in EU intervention i.e. whether certain issues should be regulated at EU level or should be left for possible regulation at the Member State level.

* 25. In your view, to what extent has the CRS Code of Conduct provided additional benefits beyond what would have been achieved at national level without such intervention?

- To a great extent
- Somewhat
- Very little
- Not at all

Please explain your choice

1500 character(s) maximum

D. Further information

26. If you wish to add further information or comments - within the scope of this questionnaire - please feel free to do so here.

3000 character(s) maximum

Not all airlines participate in NDC. Not all travel agents and tour operators have yet NDC connections. The need for an independent CRS is necessary.

27. Please feel free to upload a concise document, such as additional evidence supporting your responses or a position paper. The maximum file size is 1MB.

The maximum file size is 1 MB

Useful links

[Consultation page \(https://ec.europa.eu/info/consultations/2018-crs-code-conduct_en\)](https://ec.europa.eu/info/consultations/2018-crs-code-conduct_en)

Contact

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