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Future of Transport
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CONSULTATION ON MOBILITY AS A SERVICE CODE OF PRACTICE

Background

The Urban Transport Group (UTG) represents the seven largest city region strategic transport bodies in England, which, between them, serve over twenty million people in Greater Manchester (Transport for Greater Manchester), London (Transport for London), the Liverpool City Region (Merseytravel), Tyne and Wear (Nexus), the Sheffield City Region (South Yorkshire Passenger Transport Executive), the West Midlands (Transport for West Midlands) and West Yorkshire (West Yorkshire Combined Authority).

We also have the following associate members: Tees Valley Combined Authority, Strathclyde Partnership for Transport, West of England Combined Authority, Nottingham City Council, Translink (Northern Ireland), Transport for Wales and Cambridgeshire and Peterborough Combined Authority.

Our members plan, procure, provide and promote public transport in Britain's largest city regions, with the aim of delivering integrated transport networks accessible to all.

Response

We welcome the opportunity to respond to this consultation on *Mobility as a Service Code of Practice*.

To harness transport innovation, including MaaS, UTG believes that five key foundations should be in place:

1. Agile and devolved governance to support and protect wider goals for people and place;
2. Long-term funding certainty giving space to plan strategically and creatively;
3. Key standards set nationally, with the scope to go above and beyond locally;
4. Open data, shared safely, to inform decision making; and

URBAN TRANSPORT GROUP
represents Greater Manchester, London, Liverpool City Region, Tyne and Wear, Sheffield City Region, West Midlands, West Yorkshire.
Cambridgeshire & Peterborough Combined Authority, Nottingham City Council, Strathclyde Partnership for Transport, Translink, Tees Valley
and West of England Combined Authorities are associate members of the group.

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5. Freedom to test new approaches on the ground.

A MaaS code of practice that embeds these foundations will enable city regions to grasp the opportunities that MaaS presents to support sustainable transport options.

A MaaS code of practice offers an opportunity to ensure that the industry is working towards common goals, standards and sharing agreements and, in turn, enable MaaS to deliver for end users. City region transport authorities will benefit from a MaaS code of practice in terms of supporting their ways of working with other stakeholders involved in the development of MaaS.

Key ways that a MaaS code of practice could be relevant for a range of stakeholders (Q4) include:

- Supporting innovation while ensuring that wider public policy goals are not undermined (e.g. increasing motorised travel such as taxis or ride hailing, at the expense of public transport or active travel).
- Helping public authorities to ensure that commercial providers are helping to meet wider public policy goals (including reducing congestion and air pollution; improving health; and increasing public transport and active travel use).
- Fostering collaboration between public authorities, MaaS providers and transport operators.
- Encouraging MaaS providers to support a range of transport users including people on low incomes, disabled people and those who might not be confident using a digital platform.

A MaaS code of practice could establish who is responsible for consumer rights, particularly in terms of multi-operator and multi-modal journeys. For example, if one stage of the journey fails and connections are missed, who is responsible for the rights of the consumer in this case. This would help to ensure consumer confidence in MaaS offerings and ensure that it presents and attractive and viable alternative to private car use. (Q5)

A code of practice could help to ensure data quality by stating minimum standards, supporting all stakeholders to ensure that data quality is not a barrier to the development and implementation of MaaS. A code of practice should support transport authorities in accessing data from MaaS providers, which can inform improvements to transport services or enable the achievement of other public policy goals. (Q6)

There are a range of challenges that impact on the ability of stakeholders to share data. In particular, commercial sensitivity concerns and protection of personal data are often cited as barriers. A MaaS code of practice could set out a framework to ensure that commercial and personal data can be protected whilst ensuring that data can be shared to support the delivery of, and improvements to, services. Meeting the needs of transport customers should be the priority and that should include protecting data but also ensuring that services meet their needs (Q12-13).

Multi-modal ticketing products already exist in the city regions including M-card in West Yorkshire and Pop card in Tyne and Wear. The problem is that they are often priced uncompetitively and are not promoted by rail and bus operators who prefer to focus on their own ticketing products. This is due to bus deregulation and rail privatisation. The introduction of franchising of bus networks (and to some extent Enhanced Partnerships elsewhere) as well as the reforms of the national rail network should help address some of these challenges.

There is an additional challenge relating to new technologies and business models (such as daily capped ticketing using mobile phone apps and bankcards) where the back office and commercial arrangements are not established to allow for multi-operator or multi-modal ticketing. The Government's current approach risks failing to address these challenges as it is siloed into a contactless ticketing programme for rail and a multi-operator system for bus. There is no specific plan or programme for multi-modal ticketing which remains a longer term goal. If there is no specific plan for multi-modal public transport ticketing then there is by extension no plan for how MaaS products could also be integrated (Q17).

The risk is that (as has happened hitherto) the approach to ticketing in GB continues to be fragmented with progress slow and haphazard with multiple initiatives, products and technologies leading to incompatibilities and sub-optimal outcomes (Q18).

Historically, providing multi-modal and multi-operator ticketing has been challenging in a deregulated, fragmented and privatised transport market (Q19, see also responses to Q17-18).

It is important that MaaS providers ensure that their systems are accessible and inclusive to all users, from the information provided, the journeys offered through to the booking and payment options available. This may include, for example, offering information in multiple formats, ensuring that journey information includes assistance available and making sure that there are payment options available to those without a bank account (e.g., payment by SMS or in cash). It will be important to ensure that the best transport deals, information and packages are available to all through multiple channels – not just to those with smart phones and bank accounts (Q21).

Co-designing services with a range of users will help to ensure that the platform meets the needs of all users (Q20-21). The code of practice could set out guidelines for co-design processes with a range of user groups and accessibility professionals to help MaaS providers and other stakeholders to ensure that their services are accessible and inclusive (Q22-24).

MaaS platforms can encourage sustainable transport options by presenting them first, showing their full cost comparison (for example by fully capturing the costs of driving, not just fuel / parking costs) and by nudging people to choose these options with rewards.

A MaaS trial in Greater Manchester provided nudges to encourage people to walk or cycle and a quarter of these nudges were accepted by users. Following the trial, 26 per cent of participants were more willing to use public transport and 21 per cent were more willing to walk and cycle[1].

Displaying carbon data for different journey choices is also a valuable opportunity for MaaS platforms. A code of practice could set out guidance for these kinds of interventions and other personalisation options (e.g., suggesting the best transport options based on weather, pollen count, how busy a route is or other user preferences) (Q28-29).

At the heart of a MaaS code of practice should be the principle that MaaS should encourage more sustainable transport and improve the customer experience. A code of practice should also ensure that transport authorities are enabled to engage with

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[1] Manchester road tests MaaS - Smart Cities World

stakeholders in MaaS and guide interventions to ensure that they deliver across a range of public policy goals (Q32).

If you require any further information, please do not hesitate to get in touch.

Yours faithfully,

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