



Report of the Federal Railway Authority

on the Activities to enforce the Rights of Passengers in
Bus and Coach Transport in accordance with Article 29
of Regulation (EU) No 181/2011



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Years under review 2017 and 2018



Eisenbahn-Bundesamt

Publication data:

Eisenbahn-Bundesamt

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As at: 31 January 2019



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1. Introduction

Regulation (EU) No 181/2011 of the European Parliament and of the Council of 16 February 2011 concerning the rights of passengers in bus and coach transport and amending Regulation (EC) No 2006/2004¹ has been in force since 1 March 2013. In accordance with Article 29 of Regulation (EU) No 181/2011, the national enforcement bodies publish a report on their activity in the previous two calendar years every two years after 1 June 2015.

In accordance with Section 3 (1) of the EU Bus and Coach Passenger Rights Act (EU-FahrgRBusG), the Federal Railway Authority (EBA) was designated as national enforcement body and performs the tasks for the implementation of Regulation (EU) No 181/2011 while making use of the synergy effects from the experiences made as the national enforcement body for railway and maritime and inland waterway transport. Moreover, it is the complaints body in cases where no solution with the carrier could be agreed on (second sentence of Section 3 (2) of the EU-FahrgRBusG and Article 28 (3) (2) of Regulation (EU) No 181/2011).

The Member State Germany has, pursuant to Section 1 (2) of the EU-FahrgRBusG, made use of the exemption provided for in Article 2 (5) of Regulation (EU) No 181/2011, exempting particular regular services from the scope of application of this Regulation if a significant part of such services, including at least one scheduled stop, is operated outside the Union. This exemption expired on 28 February 2017. No use was made of the option to extend this period.

Furthermore, Section 1 (3) of the EU-FahrgRBusG provides that Article 16 (1) (b) of Regulation (EU) No 181/2011 does not apply to the carriers until 28 February 2018 as regards the training of their drivers (cf. Article 16 (2) of Regulation (EU) No 181/2011). Since 1 March 2018, Article 16 (1) (b) of Regulation (EU) No 181/2011 has thus also been applying to drivers.

Passengers can submit their complaints under passenger rights legislation not only to the national enforcement body at the Federal Railway Authority but can, in accordance with Section 6 of the EU-FahrgRSchG, also contact arbitration entities recognised by the Federal

¹ In the following: Regulation (EU) No 181/2011.



Ministry of Transport and Digital Infrastructure (BMVI), provided that the carrier concerned is a member thereof. Currently, these are the Schlichtungsstelle für den öffentlichen Personenverkehr e.V. (söp), the Nahverkehr-Schlichtungsstelle e.V. (SNUB) and since 1 December 2017 the Schlichtungsstelle Nahverkehr e. V. (snv).



2. Functions and activities of the national enforcement body as complaints body

2.1 General

Since 1 March 2013, Regulation (EU) No 181/2011 concerning the rights of passengers in bus and coach transport has been in force. With effect from 27 July 2013, the Federal Railway Authority (EBA) was nominated as the national enforcement body. As part of this function, EBA has, among other things, to deal with complaints submitted by passengers.

In accordance with Section 3 (2) of the EU-FahrgRBusG, passengers have first of all to contact the carrier before consulting the national enforcement body as complaints body. Subsequently, passengers can submit a complaint regarding the decision of the carrier to the national enforcement body for review if they are of the opinion that the carrier did not observe the passenger rights guaranteed by law.

In the initial phase, i.e. in the years 2013 and 2014, the national enforcement body for the rights of bus and coach passengers only received a relatively low number of enquiries/complaints concerning passenger rights, but this number considerably increased in 2015 and 2016. This trend also continued unabatedly in the period under review 2017/2018.

In order to compare the number of complaints among the individual transport modes, the Federal Ministry of Transport and Digital Infrastructure, which is competent in this respect, defined the term “complaint” in July 2016 as follows. Accordingly, complaint as defined by the relevant EU Passenger Rights Regulation means only written submissions reporting an infringement of the relevant Regulation and for which the Federal Railway Authority as the national enforcement body takes a decision of substance.

In practice, this means that for example such submissions where the Federal Railway Authority only refers the passenger to the carrier, other regulatory authorities, other national enforcement bodies or to arbitration entities can, for statistical purposes, not be considered as complaints under passenger rights law. This includes general submissions, for instance concerning out-of-order toilets, rude drivers or civil claims for loss of luggage.



Other complaints, which are not covered by the narrow definition of the term, are of course also dealt with by the Federal Railway Authority. In the following, these complaints are designated as submissions.

The complainants will receive a reply to all submissions which either explains the function of the Federal Railway Authority as a complaints body or which refers them to the carrier or an arbitration entity, as the case may be. In the case of complaints covered by the narrow definition of the term, the complainant will receive an explanation of the outcome of the administrative procedure and of the settlement of possible claims.

2.2 Data concerning the handling of complaints in 2017

In 2017, a total of 1,117 written and 319 oral submissions in connection with the rights of passengers travelling by bus and coach were received by the national enforcement body.

173 of the written submissions did not directly concern passenger rights issues. In 787 cases, the complainants were directly referred to the carrier. These were either submissions which were not related to passenger rights, such as requests for rebooking, or requests under passenger rights legislation for which the carrier is the first point of contact for complaining in accordance with Article 28 (3) (2) of Regulation (EU) No 181/2011 in conjunction with the second sentence of Section 3 (2) of the EU-FahrgRBusG.

34 cases were referred to the arbitration entities. In some individual cases, complaints were transferred to other national enforcement bodies.

137 submissions comply with the narrow definition of the term “complaint” as mentioned above, which applies to all transport modes. These complaints are analysed in greater detail in the following.



Type and contents of the complaints in 2017 ²				
Regulation (EU) No 181/2011	Contents	Number of complaints	Infringements	Remarks
Article 7 (1)	Compensation for luggage in the event of accidents	1	47 ³	Damage to luggage due to accidents
Article 19 (1) (a)	Choice offered between re-routing/reimbursement	43		No or only insufficient choice offered
Article 19 (1) (b)	Reimbursement in accordance with Article 19 (1) (b)	33		No reimbursement or reimbursement by voucher instead of money or reimbursement under fare schemes instead of passenger rights
Article 19 (2) - (5)	Obligations in the case of a cancelled or delayed service or overbooking	26		Delay in departure / cancellation, compensation, deadline for reimbursement, inoperability of the vehicle
Article 20	Information in the event of a delay in departure / cancellation	27		No, incorrect or delayed information
Article 24	Adequate information of passengers throughout their travel	7		Lack of information

In many cases, the complaints referred to Article 19 of Regulation (EU) No 181/2011 providing, among other things, that the carrier, in the case of cancellation, overbooking or delayed departure from a terminal of more than 120 minutes, has to offer the passenger the choice of continuation of the journey at no additional cost and under comparable conditions or of reimbursement of the ticket price. Such complaints frequently include a reference to inadequate or lacking information about the situation and the expected delay in departure (Article 20). A frequent reason for complaints concerned the right to adequate travel information during the journey (Article 24).

In several cases, the Federal Railway Authority asked the carriers for a statement in order to clarify the situation. It was then, as a rule, not necessary to take more far-reaching

²Evaluation by the deadline of 28 January 2019

³ Related to all complaints complying with the narrow definition of the term.



enforcement measures. After reviewing the comments of the carriers, 47 infringements were determined which had already been settled in the course of administrative procedures. Further penalties beyond the administrative procedures were not necessary.

On the basis of a complaints procedure, proceedings for the collection of fines concerning the infringement of Section 2 (10) of the EU Bus and Coach Passenger Rights Regulation (EU-FahrgRBusV) were initiated against one carrier in the last period under review. In accordance with Section 2 (10) of the EU-FahrgRBusV, a person who, in contravention of Article 19 (1) of Regulation (EU) No 181/2011, does not provide a service mentioned there commits an administrative offence as defined by Section 9 (1) of the EU-FahrgRBusV. In the present case, a passenger was referred to a chargeable service number in order to obtain information about options for the continuation of this journey. This does not comply with the applicable standards. The passenger was not offered the choices mentioned there. In 2017, these proceedings were terminated by imposing a fine of 1,000 EUR.

2.3 Data concerning the handling of complaints in 2018

In 2018, a total of 1,882 written and 502 oral submissions in connection with the rights of passengers travelling by bus and coach were received by the national enforcement body.

160 of the written submissions did not concern passenger rights issues. In 1,440 cases (submissions not referring to passenger rights, such as arrangements for the carriage of luggage, or submissions which had not been addressed to the carrier as the first complaints body), the complainants were directly referred to the carrier and in 45 cases to the arbitration entities. In this context it should be noted that even in those cases where the complainant is directly referred to the carrier, the passenger is informed about the arbitration entity as the case may be, if the facts of the case are eligible for arbitration.

In 2018, too, individual complaints were transferred to neighbouring national enforcement bodies.

166 submissions comply with the narrow definition of the term “complaint” as mentioned above, which applies to all transport modes. These complaints are analysed in greater detail in the following.



Type and contents of the complaints in 2018 ⁴				
Regulation (EU) No 181/2011	Contents	Number of complaints	Infringements	Remarks
Article 9	Right to transport and issuance of a ticket	3	57 ⁵	
Article 19 (1) (a)	Choice offered between re-routing/reimbursement	50		No or only insufficient choice offered
Article 19 (1) (b)	Reimbursement in accordance with Article 19 (b)	22		No reimbursement or reimbursement by voucher instead of money or reimbursement under fare schemes instead of passenger rights
Article 19 (2) - (5)	Obligations in the case of a cancelled or delayed service or overbooking	48		Delay in departure / cancellation, compensation, deadline for reimbursement, inoperability of the vehicle
Article 20	Information in the event of a delay in departure / cancellation	24		No, incorrect or delayed information
Article 24	Adequate information of passengers throughout their travel	7		Lack of information
Article 25	Information on passenger rights	2		
Article 27	Handling of complaints	10		No reply Standard reply without reference to the reason for complaint

The complaints made in 2018, too, referred in the majority of cases to Article 19 of Regulation (EU) No 181/2011, often indicating inadequate or lacking information about the situation and the expected delay in departure (Article 20). Further complaints were again made in connection with the right to adequate travel information (Article 24) and the handling of complaints (Article 27).

⁴Evaluation by the deadline of 28 January 2019

⁵ Related to all complaints complying with the narrow definition of the term.



After clarification of the facts, 57 infringements were determined which had already been settled in the course of the administrative procedures. Further penalties beyond the administrative procedures were not necessary. By the reporting date (28 January 2019), 20 administrative procedures had not yet been terminated so that the actual number of infringements will still increase.

Administrative proceedings from 2016 concerning the obligation of the carrier to provide passengers with adequate information throughout the travel in accordance with Article 24 of Regulation (EU) No 181/2011 were settled by mutual agreement in the second half of 2018 with the recognition of the legal obligation.

2.4 Prospects for the handling of complaints

The awareness level of the Federal Railway Authority as national enforcement body has further increased during the period under review 2017/2018.

It must, however, be stated that the majority of complainants have, first of all, to be referred to the carrier. The Federal Railway Authority has acted as a complaints body only in a few cases.

It has to be assumed that the number of submissions/complaints will gradually rise in line with the increasing importance of bus and coach transport. A noticeable fact is, however, that the number of submissions increased by about 700 from 2017 to 2018. This significant increase concerns especially submissions which had to be addressed to the carrier (increase of this number by just under 100%) because the carrier had not been contacted or the national enforcement body had been mixed up with the carrier.



3. Enforcement of passenger rights by supervisory measures

3.1 General

During the period under review 2017/2018, the Federal Railway Authority as the national enforcement body has also proactively taken measures in accordance with Article 28 (1) of Regulation (EU) No 181/2011 and Section 4 of the EU-FahrgRBusG to ensure compliance with Regulation (EU) No 181/2011. In the period under review, the focus was on the verification of compliance with the obligation to provide information in regular long-distance coach services, the establishment and maintenance of a system to handle complaints as well as on barrier-free travelling.

In view of the treatment of passengers by tour operators and travel agents which was in the past in the majority of cases in compliance with the Passenger Rights Regulation, supervisory measures are only carried out if a relevant incident occurs. Therefore, in the years under review 2017 and 2018, no assessments were carried out.

If infringements were identified, the obligated parties were asked within the framework of administrative procedures to comply with the law. Further penalties beyond the administrative procedures were not necessary in the period under review.

3.2 Data on the proactive enforcement of passenger rights in 2017

In 2017, altogether 210 assessments involving carriers and infrastructure providers were performed. Carriers accounted for 131 of these assessments, terminal managing bodies for 79.

In the sector of regular long-distance coach services, the supervisory measures involved the carriers according to their respective market share which means that the vast majority of measures concerned the market leader. This market leader serves to a certain extent as a role model for the whole German sector of long-distance coach transport since a clear majority of all passengers may be affected by potential infringements.



3.2.1 Carriers

The essential supervisory task in 2017 included - as already in the previous year - anonymous inspection trips in long-distance buses and coaches throughout Germany if certain incidents made this necessary. In the event of delays, ad hoc measures were taken to monitor whether the treatment of passengers was in compliance with the Regulation.

These trips were meant to assess the behaviour of the carrier with regard to his obligation to provide information in situations where this was essential under legislation governing passenger rights. These include the obligation to provide information by electronic means in the event of delays in departure or cancellation of the service or if passengers miss a connecting service in accordance with Article 20 (1) in conjunction with (4) of Regulation (EU) No 181/2011, the provision of adequate information to the passengers throughout their travel - especially information about delays in arrival provided on board - in accordance with Article 24 of Regulation (EU) No 181/2011 as well as the information of passengers about their legal rights in accordance with Article 25 of Regulation (EU) No 181/2011.

In addition, compliance with the obligation to provide information in accordance with Article 19 (1) and (4) of Regulation (EU) No 181/2011 was supervised for the first time. If departure of a service from a terminal is delayed by more than 120 minutes or if it is cancelled, the passenger is offered the choice between alternative travel options to his destination under comparable conditions and at no additional cost or to cancel the journey with reimbursement of the ticket price.

It was assessed whether the obligation to provide information to the passenger was complied with. As a follow-up to supervisory measures, complaints documentation was in special cases requested from the long-distance coach operator. In the final analysis, the obligation to provide information is, in principle, complied with. In the individual case, there is still scope for improvement especially as regards connecting services.

The checks made on the crews were accompanied by an assessment of the carrier in order to also determine the status of implementation of the regulatory content of Regulation (EU) No 181/2001 at this level. Business processes in connection with passenger information were assessed and it was found that the instructions issued by the management of the company were, as a rule, complete and unambiguous.



Cooperation with the traffic management centres of the bus terminals with regard to information about deviations from the schedule was also assessed. At that time, there was no IT-based transmission of such data from the carrier to the terminal managing bodies. The traffic management centres were informed either by phone or by on-site staff members of the carrier.

Key issues of the assessment of carriers in 2017⁶			
Regulation (EU) No 181/2011	Contents	Number of assessments	Infringements
Article 13	Ensuring accessibility for disabled persons	131 ⁷	50 ⁸
Article 19	Continuation, re-routing and reimbursement of the ticket price		
Article 20 (1) and (4)	Information in the event of cancellation or delay in departure		
Article 21	Assistance in the event of cancellation or delay in departure		
Article 24	Adequate information of passengers throughout their travel		
Article 25	Information on passenger rights		
Article 27	Submission of complaints		

In order to support disabled persons and persons with reduced mobility in accordance with Article 13 (1) of Regulation (EU) No 181/2011 at designated bus terminals, specific

⁶ Evaluation by the deadline of 23 January 2019

⁷ Thereof 105 anonymous inspection trips.

⁸ Non-communication of delay in arrival on board the bus or coach in accordance with Article 24 of Regulation (EU) No 181/2011 was only classified as such as from a delay of more than 30 minutes. Cases involving a delay of less than 30 minutes are not listed.



processes have been laid down in order to offer and provide assistance free of charge. The carrier has in the meantime established a separate organizational unit which coordinates the processes from the booking of the journey by phone to the provision of assistance. These efforts to raise quality standards are accompanied by the deployment of a pool of vehicles with storage spaces for wheelchairs; these vehicles can be used flexibly as required throughout the route network.

On the basis of information provided by the complaints management of the national enforcement body, individual carriers were assessed with regard to the admission of passengers as well as the communications processes between the driver and the operations centre. It was found that the booking process is not always performed in an automated form which may cause manual errors. The tracking system which is generally available makes it possible for the operations centre to provide timely information to the passengers via text messages, however, in the case of failure of this system, the driver can only inadequately take over this function.

3.2.2 Terminal managing bodies

For the assessment of the terminal managing bodies the focus was on compliance with the obligation to provide information in the case of deviations from the schedule as this is required in Article 20 (1) of Regulation (EU) No 181/2011. At the same time it was checked at the terminals whether passengers were informed about their rights as well as about the details required to contact the national enforcement body in accordance with Article 25 of Regulation (EU) No 181/2011.

The processes between the terminal managing bodies and the operators of regular long-distance coach services which are necessary to dynamically provide passenger information in good time have in many cases been effectively implemented. In cases where the IT-based prerequisites are not yet adequately available, the operations centre passes on information by phone or this task is assigned to personnel on site.

Numerous serious shortcomings over a longer period of time were only identified in one case. Information about delays which is important to passengers in the event of a disruption was not provided. An administrative procedure was initiated.



In two cases, information on passenger rights in accordance with Article 25 of Regulation (EU) No 181/2011 was not provided. In these cases, too, administrative procedures were initiated.

Key issues of the assessments of bus terminal managing bodies in 2017⁹			
Regulation (EU) No 181/2011	Contents	Number of assessments	Infringements
Article 20 (1)	Information in the event of delays in departure/cancellation	79 ¹⁰	5
Article 25	Information on passenger rights		

3.3 Data on the proactive enforcement of passenger rights in 2018

In 2018, altogether 162 assessments involving carriers and terminal managing bodies were performed. Carriers accounted for 80 of these assessments, terminal managing bodies for 82.

Apart from the administrative litigation procedure concerning the adequate information of passengers throughout their travel (see 2.3), an out-of-court settlement was achieved in the second legal proceedings of 2016. These proceedings concerned the obligations set out in Article 20 (1) in conjunction with (4) of Regulation (EU) No 181/2011: “information in the event of delays in departure or cancellation of the service or if passengers miss a connecting service”. In these proceedings, too, the company undertook to comply with passenger rights within the meaning of the out-of-court settlement.

⁹ Evaluation by the deadline of 23 January 2019

¹⁰ The number of assessments also includes assessments of long-distance bus terminals in order to classify them as bus terminal and/or stop in accordance with Regulation (EU) No 181/2011.



3.3.1 Carriers

The activities to check how the business processes are implemented by the carrier were continued by anonymous inspection trips in long-distance buses and coaches.

In the meantime, information of the passengers in the event of delays in departure in accordance with Article 20 of Regulation (EU) No 181/2011 was provided largely in compliance with the requirements of this Regulation.

First supervisory measures carried out after the out-of-court settlement concerning the information of passengers about delays in arrival during the journey (see 2.3) still revealed some isolated infringements by the relevant carriers; in these cases administrative procedures were initiated.

The inspection focused on the occasionally occurring delays in departure of more than 120 minutes from a bus terminal in order to verify compliance with the obligations under Article 19 (1) and (4) of Regulation (EU) No 181/2011. The choice between re-routing to the destination at no additional cost under comparable conditions or reimbursement of the ticket price to which passengers are entitled was not always offered to them. An administrative procedure was initiated.

The assessment of the carriers which was also performed in 2018 focused on the system of complaints handling. The individual procedural steps, especially the easy access to the submission of complaints for passengers, the acceptance of such complaints and their handling, communication with the complainant as well as contact persons and their specific competence to solve the problem were considered.

At the level of the carriers it was also assessed whether the obligation to train the personnel in accordance with Article 16 (1) (b) of Regulation (EU) No 181/2011 is implemented. The carriage of disabled persons and persons with reduced mobility requires adequate training and/or instructions of the relevant personnel, including the drivers, to deal with disability-related issues. The theoretical training concept used for this purpose was assessed. A concept for practical instructions to be provided by the carrier is being prepared to supplement the theoretical training. The final overall assessment has still to be made.



Key issues of the assessments of carriers in 2018 ¹¹			
Regulation (EU) No 181/2011	Contents	Number of assessments	Infringements
Article 16 (1)	Training / instructions to deal with disability-related issues	80 ¹²	26 ¹³
Article 19	Continuation, re-routing and reimbursement of the ticket price		
Article 20 (1) and (4):	Information in the event of cancellation or delay in departure		
Article 24	Adequate information of passengers throughout their travel		
Article 25	Information on passenger rights		
Article 26	Complaints handling mechanism		
Article 27	Submission of complaints		

3.3.2 Terminal managing bodies

The catalogue of obligations for the terminal managing bodies was the key issue of the supervisory activities.

The establishment of a process to receive information on deviations from the schedule and to communicate them had in one case to be ordered by an official communication in order to ensure compliance with the law.

¹¹ Evaluation by the deadline of 23 January 2019

¹² Thereof 67 anonymous inspection trips.

¹³ Non-communication of delay in arrival on board the bus or coach in accordance with Article 24 of Regulation (EU) No 181/2011 was only classified as such as from a delay of more than 30 minutes. Cases involving a delay of less than 30 minutes are not listed.



In four cases, information on passenger rights in accordance with Article 25 of Regulation (EU) No 181/2011 was not provided. In these cases, too, administrative procedures were initiated.

Key issues of the assessments of bus terminal managing bodies in 2018¹⁴			
Regulation (EU) No 181/2011	Contents	Number of assessments	Infringements
Article 20 (1)	Information in the case of delays in departure/cancellation	82 ¹⁵	5
Article 25	Information on passenger rights		

3.4 Prospects for the enforcement of passenger rights by supervisory measures

The verification of the provision of passenger information before and during the bus or coach journey will also be an element of next year's supervisory activities. Journeys involving changes to a connecting service, which are rather rarely used by the passengers, will also be considered. Currently, there are no valid findings concerning the provision of information in the case of missed connecting services.

The qualification of the personnel as regards the accessibility of the services will continue to be in the focus of the supervisory activities. To support the current assessments, staff members of the national enforcement body will personally accompany the qualification measures of the drivers. In a third step, the sustainability of the training measures for drivers will be assessed within the context of concerted supervisory measures carried out throughout Germany.

Moreover, the establishment of an emergency management system and the assistance provided in the case of accidents will be closer examined.

¹⁴ Evaluation by the deadline of 23 January 2019

¹⁵ The number of assessments also includes assessments of long-distance bus terminals in order to classify them as bus terminal and/or stop in accordance with Regulation (EU) No 181/2011.



4. Other activities of the national enforcement body

4.1 Public relations work of the national enforcement body

In addition to providing information on passenger rights on the website of the Federal Railway Authority, the national enforcement body also made use of flyers on passenger rights in rail, maritime and inland waterway and bus and coach transport in order to inform passengers about their rights under Regulation (EU) No 181/2011.

At the annual open day of the Federal Ministries, the national enforcement body regularly offers a point of contact to provide citizens with information on passengers' rights. In the period under review, such events were held from 26 to 27 August 2017 and from 25 to 26 August 2018.

4.2 Maintaining contacts with associations

On 15 June 2018, the national enforcement body had an exchange of opinion at an event organized with the German passenger association "PRO BAHN" on passenger rights issues.

4.3 Cooperation with the arbitration entities

At a meeting with the Schlichtungsstelle für den öffentlichen Personenverkehr e.V. (German Conciliation Body for Public Transport -söp) on 22 February 2018, an exchange of views was held on passenger rights issues.

For the handling of complaints, reference is regularly made to the arbitration entities if the reason for complaint is beyond the responsibility of the national enforcement body, the case seems to be eligible for arbitration and the carrier concerned is a member of the arbitration entity.



4.4 Cooperation of the national enforcement bodies

Besides the exchange of information among the national enforcement bodies (NEB) in bus and coach transport under the auspices of the European Commission in Brussels, individual complaint cases are transferred to other national enforcement bodies if these cases are outside the field of competence of the Federal Railway Authority.



5. Conclusion

In the period under review 2017/2018, the importance of passenger rights for the users of the bus and coach transport mode has further increased. This trend is also clearly reflected by the number of submissions to the Federal Railway Authority as the national enforcement body.

It has to be noted that many passengers directly contact the national enforcement body without first of all approaching the carrier in accordance with the second sentence of Section 3 (2) of the EU-FahrgRBusG so that a majority of these cases is referred to the carrier. In such cases, the national enforcement body explains the legal situation to the complainants.

The supervisory measures of the national enforcement body continued to be based on the results determined in the course of the assessments as well as on the contents of the complaints made by passengers. For the sector of regular long-distance coach services, the supervisory measures concerning carriers were performed according to their market share. A clear majority of the passengers might be affected by potential infringements of the market leader. Therefore, the market leader serves to a certain extent as a role model for the whole sector of long-distances bus and coach transport in Germany.

In the period under review to come, the key issues will be the verification of the qualification of the personnel with regard to disability-related issues and the assessment of information provided in the case of missed connections, especially if the journey includes a connecting service.

Taking account of the number of submissions and of the supervisory measures performed it has to be assumed that passengers as well as the obligated parties are becoming increasingly aware of the rights and obligations contained in Regulation (EU) No 181/2011 and of the Federal Railway Authority as the competent national enforcement body.