



Global Institute for  
Structure relevance,  
Anonymity and  
Decentralization i.G.

**GISAD comment on [https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13133-Multimodal-digital-mobility-services/feedback\\_en?p\\_id=26580602](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13133-Multimodal-digital-mobility-services/feedback_en?p_id=26580602)**

GISAD (Global Institute for Structure relevance, Anonymity and Decentralisation i.G.) is an institute in founding. GISAD wants to develop a digital system (EU-D-S) from the perspective of the citizens of Europe, which can hold its own in system competition with gatekeepers and a social credit system.

The aim of GISAD is to support the creation of a holistic Marshall Plan, as called for by the President of the European Commission, Ursula von der Leyen. The core of the Marshall Plan must be a digital concept adapted to civil rights and diversity. If individual measures are taken without an overall system of their own, Europe runs the risk of losing the system competition to other economic areas such as a centrally controlled China.

- GISAD's opinion is subject to the proviso that it is to be as part of an overall digital concept understood (multiple use of the same infrastructure without additional costs).

GISAD has defined three goals on which a Marshall Plan should focus:

1. The optimal refinement and simple exploitation of digital data, while maintaining diversity and performance-adopted involvement of all parties involved in the value creation.
2. The stigma-free, lifelong digital inclusion of all citizens with incentives for self-development.
3. The digital guarantee of the necessary state tasks to maintain security for citizens, the economy and the state, while preserving pre-digital democratic achievements.

**Challenges:**

GISAD welcomes the initiative on multimodal digital mobility. However, it is unlikely that only a legal framework will be able to meet the challenges in terms of optimal flexibility of travel while ensuring maximum energy efficiency through optimal use of passenger capacity. The prerequisite for this is that all transport providers must be able to access data on common mobility movements. Requests taking into account all stakeholders must be in addition for journey planning in real time answered. In the context of carpooling, these actors can also be private individuals.

**Without an overall concept, as presented by the EU-D-S, the initiative will not achieve the necessary effects:**

- Considerable will be tax revenues tied up without improving the economic situation of the market participants.
- The commercialisation of personal sensitive data is by the system provoked. This is the only way to arouse the interest of large transport companies to pass on customer data to competitors.
- Discriminatory behaviour cannot be by MDMS ruled out by laws alone. The digital manipulation possibilities for passing on data with a time delay or in a restricted manner are too diverse.
- It is difficult to imagine how private driving services can be into such a concept integrated without discrimination.

**Solutions proposed by GISAD within the framework of an overall EU-D-S system:**

- In the EU-D-S are one-off tax funds needed to kick-start the overall system. Taking into account the horizontal scaling effects, it can be assumed that new revenues can be generated even for the large transport companies, see <http://gisad.eu/en-all-for-one-eu-an-analysis-of-over-50-eu-initiatives/> .
- The commercialisation can be of sensitive personal data ruled out, as personal data is not stored in the EU-D-S. Nevertheless, in individual cases and after a court order, a perpetrator will be of abuse clearly identified by means of digital forensic traces.
- The EU-D-S should be by a cooperative operated in each of the 24 language areas. The legal framework should be of the cooperative agreed with the EU. All members of the cooperative have equal access to the generated mobility data. Every European mobility provider has the right to become a member of the cooperative. In this way can be discrimination largely excluded.
- The fact that the cooperatives are according to language areas divided and not according to countries prevents individual EU countries from supporting national solo efforts. Most languages are as official languages spoken, or at least as recognised minority/regional languages, in several countries.
- Every EU citizen over the age of 10 is to receive a PDS (personal digital system), through which he or she logs into the EU-D-S with one of 1,000 IP addresses in the mobility system. The user can decide whether is always the same IP address used when logging in or whether any of the 1,000 IP addresses used at random. In both cases is the movement profile taken into account when planning the provision of transport. If it always is the same IP address preferences of the type of means of transport can additionally be provided by the EU-D-S. However, the advantages are only marginal, as the preferences can just as well be stored in the PDS and automatically transmitted with a request.
- Anonymous simple payment is ensured via the EU-D-S, see <http://gisad.eu/en-the-instant-payment-wallet-in-the-eu-d-s/> .
- Private carpooling can easily be into the EU-D-S mobility concept integrated. Every EU citizen is in the system registered and only has to change status from customer to provider to invite other EU citizens to join a carpool. Even for the transport companies, it has economic effects if they no longer have to fulfil their service mandate on rural, little-used routes.
- Because of the data available to all members in the cooperatives, objective and unbiased energy efficiency data can be determined. The cooperatives in the individual language areas are in conceptual competition with each other. If the efficiency in one language area is higher than in another, the effects can be analysed and transferred to the other language areas.