



A.N.I.Tra.V.

Associazione Nazionale
Imprese Trasporto Viaggiatori

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Rome, 14 february 2024

Dear Commissioner Vălean,

As representative of the leading association of the private hire vehicle (PHV) sector in Italy, *ANITRAV - Associazione Nazionale Imprese Trasporto Viaggiatori*, I would like to draw your attention to the regulatory and business uncertainties we are facing in Italy. Forthcoming government regulations are indeed threatening the continuity of our industry.

In what has become a recurring story, the Italian government is once again hampering our PHV operations by imposing unreasonable restrictions and putting at risk our riders' personal data giving an indiscriminate access to several public administrations and security bodies.

On the operational side, the Italian government intends to re-introduce the return to garage obligation that was several times criticized by this EU Commission and lately declared unconstitutional in 2020 with a judgment of the Italian Constitutional Court. In addition, as an exemption regime from the applicability of the return to garage, it provides drivers with the unreasonable obligation to wait for 1-hour before undertaking a new trip, with the sole purpose of favoring the taxi category. Just a few exemptions exist, but none of these are applicable to PHV services booked through existing online platforms.

In addition, under the newly proposed regulatory framework the Italian government will require the registration of every single journey made in Italy through our PHVs, including sensitive information such as the driver's and rider's names and surnames and even pick-up and drop-off destinations. Such a registration, which is accompanied by a 3-year data retention period, is clearly in conflict with EU privacy principles and raises serious concerns about the protection of individual rights.

The above are only some of the issues posed by this regulatory framework. Please find attached a more detailed letter which is supported by Uber as the main mobility platform operating with the PHV sector in Italy.

Thank you in advance for your cooperation. We look forward to hearing from you soon.

Yours sincerely,

Mauro Ferri, President of *ANITRAV*