In particular, the use of HHI to test common practice seems intriguing. However, I am not sure if the analogy to monopoly markets really robust, because

• Passenger transport is not one market with "free choice of company" (mode), such as a national cellphone market, but rather a patchwork of many overlapping sub-markets of groups of passengers with varying access and costs for different modes

• The sub-market of passengers that has actually potential access to the company/mode "car pooling" is much smaller than the entire transport by car/truck/van: It is restricted to people that (i) commute and (ii) have similar points of Origin and Destination for their commute to be able to share and (iii) where at least one of the sharing group owns and drives a car.

Based on this, the current share of car pooling in your example may be a much higher share of the submarket than the 6.7% you mention.

On the other hand, car pooling of people that have the same O-D and do not know of each other is very rare in absence of established car pooling organizations. Here, the additionality argument could be much simpler.