

Technical Position Paper

CCS TSI Recast

January 4th 2016

Banedanmark does not support this EIM position paper

1. Introduction

The CCS TSI set out as annex to Commission Decision 2012/88/EU has been amended two times:

1. With Commission Decision 2012/696/EU, introducing the Baseline 3 specifications for the train protection part ETCS;
2. With Commission Decision (EU) 2015/14, extending the scope to the whole EU rail network, closing some open points and providing clarifications for the certification process.

The European Commission has requested a further recast of the current CCS TSI to change its legal state from Commission Decision to Regulation, in line with what has been done for other TSIs.

ERA has used the recast as an opportunity to suggest improved text of the CCS TSI, including the publication of GSM-R Baseline 1 and ETCS baseline 3 release 2 specifications. The main focus on the proposed text changes of the CCS TSI were contained within chapters 6, 'Assessing the Conformity and/or Suitability for use of the Constituents and Verifying the Subsystems', and chapter 7, 'Implementing the TSI Control-Command and Signalling.'

The recast of the current CCS TSI entered the stakeholder consultation phase¹ on 10th June 2015, with the closing date 15th September 2015.

2. EIM Comments and Positon

EIM participated in the recast consultation, sending ERA our comments on the proposed chapter 6 and chapter 7 text².

Following the consultation and comments received by numerous stakeholders, ERA released an updated proposal of the Chapter 6 text. EIM also received feedback from ERA on the comments submitted by EIM³. Annex 1 contains the comments submitted by EIM to ERA during the public consultation and the response from ERA.

Reviewing the updated proposal documentation received by ERA, EIM believe that the comments submitted during the stakeholder consultation phase have not been sufficiently taken in account and there remains an unacceptable risk with the current proposed text.

¹ Consultation on recast of CCS TSI, Reference: ERA-CON-2015-01-ERTMS, [<http://www.era.europa.eu/Document-Register/Pages/Consultation-on-recast-of-CCS-TSI-.aspx>]

² Document : '20150910_CCS TSI_Social consultation_EIM.doc'

³ Document '20150910_CCS TSI_Social consultation_EIM - ERA answer_98A48B.doc'

3. Conclusion

EIM regret that their comments submitted during the recast consultation were not sufficiently taken into account.

EIM believe that this will result in an unclear and inconsistent chapter 6 and 7 of the CCS TSI. EIM also believe that the requirements in Chapter 6 will raise costs for infrastructure manager.

EIM Position

All proposed changes to the CCS TSI chapter 6 and 7 should be cancelled and a proper discussion with the sector should be initiated.

Regarding the update of Annex A (ERTMS specifications):

- EIM recall that the choices made by ERA for to update the specifications, were only for a minor part supported by the sector organisations
- Although the sector organisations have been working on solutions for (other than those selected by ERA) problems in the ERTMS specifications, ERA refused to include and take these solutions into account
- EIM regret that the choices made by ERA will not sort out the major issues in the ERTMS specifications. Member States will have to introduce more National Technical Rules to cover these gaps.
- EIM support the backwards compatibility principle, so trains equipped with new releases of the specifications will be able to run over B2 and B3 equipped infrastructures.

Annex 1 – EIM Consultation Comments and ERA Answer

N°	Reference (e.g. Art, §)	Type/ Assess	Reviewer's Comments, Questions, Proposals (EIM Comments)	Proposal for the correction or justification for the rejection (by the European Railway Agency)
1		G	The proposed modifications are not only "editorial". Although the intention isn't wrong, the proposed text is far from mature. EIM proposes to withdraw the proposed modification of chapter 6 and start the discussion with the sector organisations about a better text for inclusion in the first TSI CCS update after the version planned by end of 2015.	ERA proposal has been extensively discussed with all stakeholders and received several constructive comments that permitted significant improvements.
2	6.1.2	P / CN	"An operational test scenario ... actions of operators)." This is practicable not feasible. The dynamic behaviour of the combination of a L2 trackside with an onboard can't be described in this simplified way. It will lead to an endless amount of operational test scenarios. What could work is that the internal RBC functional behaviour could be made public.	The ERA proposal is finalised to have published the technical behaviour of track-side ETCS (interactions with on-board), and this seems the same objective that EIM is mentioning.
3	6.1.2	P / CN	"Check of compliance of a real implementation with an operational test scenario shall be possible gathering information through easily accessible interfaces (preferably the standard interfaces specified in this TSI)." Not clear what the aim. Proposal: delete this text	This is a requirement that scenarios delivered to EC must respect and is important to permit its understanding and use by different stakeholders.
4	6.1.2	P / CN	"The set of operational test scenarios made available shall be sufficient..." This text is not relevant. The TSI already states that only TSI CCS compliant products can be certified. Moreover, this text doesn't belong to the paragraph "Principles for testing ERTMS/ETCS and GSM-R". Proposal: delete this text.	This sentence is related to what should be published. The scope is to ensure that adequate transparency on the way track-side works is achieved.
5	6.1.2	P / CN	"The European Railway Agency: 1. shall make a preliminary publication of the operational test scenarios, allowing all interested parties to comment, before the finalisation of the EC verification of the relevant track-side CCS Subsystem," This is not realistic. Together with the term of six months for comments and the possibility to argue about the solutions afterwards (and possibly again 6 months to comment?), it will take one additional year to place an ERTMS track side into service. The alternative is to check earlier at the design stage, based on the engineering rules. Proposal: Delete this text	The text has been revised to clarify timing of publishing information and avoiding negative impacts on projects.

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6	6.1.2	P / CN	<p>"4. shall use the received operational test scenarios above mentioned data base to assess the need of additional harmonised specifications for the Control-Command and Signalling On-board and Track-side subsystems,"</p> <p>This isn't a clarification but a fundamental change. Proposal: restore the original text.</p>	Not clear what the fundamental change is.
7	6.1.2	G / CN	<p>"5. shall, on the basis of the operational scenarios received, prepare and publish a standard format to be used for future publications of operational test scenarios. " We need a "first time right" approach else we have to rework our information again with a next project.</p>	There is no obligation of reworking in the proposed text.
8	Table 6.1	P / CN	<p>"Check that the quantitative reliability target (related to random failures) indicated by the applicant is met" This should be consistent with the "reliability requirement" definition as described in section 4.2.1.2 of the TSI. Proposal: delete this text.</p>	Not understood. Chapter 6 explains what has to be checked, and in any case this makes reference to a section of chapter 4. Considering that chapter 4 specifies a value for the subsystem, it is necessary that the applicants for subsystem verification have trustable information about the characteristics of equipment they are using.
9	6.2.4.1.1	P / CN	<p>"a specimen of the interoperability constituent has been submitted to a full set of test sequences"</p> <p>Not acceptable. Please keep the original text.</p>	Please, check the full reworded section, explaining how results of tests must be used. Also consider that ss-076 has at least a sequence for each functionality in the SRS, but it does not mean that you have to pass successfully all the sequences to be certified. For instance, there are sequences for Euroloop, RIU, CMD, ... which are optional functionalities that could be not implemented by the on-board equipment
10	6.2.4.1.2	P / CN	<p>"The tests can be performed using real equipment or a simulated track-side CCS subsystem ."</p> <p>Not acceptable; there is currently no guarantee that a simulated track side is identical to "real equipment". Proposal: "or a laboratory which is identical to the track side CCS subsystem"</p>	Using of simulators is common practice. No additional explanation is necessary.

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11	6.2.4.1.2	G / CN	<p>“These tests are not necessary for the certification of the on-board ETCS interoperability constituent; if an applicant requires that they are performed, the documentation accompanying the certificate shall indicate the test scenarios...”</p> <p>Operational Scenarios are for certifying the infrastructure, no to check the integration</p>	<p>The ERA proposal clarifies in fact that the operational test scenarios are the ones used for certification of track-side. In addition, they may be used to check the behaviour of on-board.</p>
12	Table 6.3	G / GN	<p>“The test must be able to verify: 2. that the Control-Command and Signalling Track-side subsystem is able to manage the intended number of trains,” Not acceptable. This isn't an interoperability requirement.</p>	Agreed
13	Table 6.3	P / CN	<p>“If additional tests under operational conditions are made for a subsystem having already an EC Certificate of Verification, corresponding information can be added to the documentation accompanying the certificate.”</p> <p>Not clear what the aim is for the CCS Track side. Proposal: delete this text.</p>	<p>This is to clarify that an applicant can have the certification documents updated if additional evidence of compliance is obtained. The text has been improved after discussions with representative organisations.</p>
14	7.2.5	M / P	<p>The text: “Being equipped with a Class B system in addition to Class A shall not be a requirement for the compatibility of vehicle with a network”, is not correct because it is too general. It is only applicable in case the vehicle is intended to run on lines where Class B is installed in parallel with Class A. Proposal: “...of a vehicle <i>with infrastructure where Class B is installed in parallel with Class A</i>”.</p>	Agreed
15	7.4.1	U/P	<p>Clause 1: It is not clear what is meant by:</p> <ul style="list-style-type: none"> • “extensions” • “short connections” • “such that trains cannot perform service exclusively on these extensions or connections” <p>Vehicles will always have to enter the connecting notes (still under Class B). What is the justification of this requirement? Proposal: Either: Limit 7.4.1. to the High Speed network (as it was) Or: Delete 7.4.1. and put all requirements in the updated European Deployment Plan (to keep the consistency).</p>	<p>The requirements for implementation of ETCS will be the ones in chapter 7 plus the ones in the EDP.</p>

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EIM, the association of European Rail Infrastructure Managers, was established in 2002 to promote the interests and views of the independent infrastructure managers in Europe, following the liberalisation of the EU railway market. It also provides technical expertise to the appropriate European bodies such as the European Railway Agency. EIM's primary goal is promoting growth of rail traffic and the development of an open sustainable, efficient, customer orientated rail network in Europe.