

CONSULTATION ON THE ERTMS DEPLOYMENT ACTION PLAN

JOINT POSITION EXBO/MB of RFC NSMED and RFC RALP

Version 12.09.2017 with joint position of EXBO/MB of RFC NSMED
with comments of RFC RALP 15.09.2017 (from MB, IMs, WG ERTMS, CW)
that will be submitted on 20 September 2017 during RFC RALP ExBo

PREAMBLE

Following the Rotterdam declaration of June 2016, ERTMS has been identified by the sector as one of the 10 priorities to be implemented.

The stakeholders of both corridors have thoroughly analysed the ERTMS Deployment Action Plan on the actions specifically oriented to the RFCs.

During the assessment, the RFC NSMED and RFC Rhine-Alpine have taken into account the comments provided by the Commission in its email of 5 July.

This position doesn't preclude that each stakeholder can inform the Commission on its own position, independently of its RFC involvement.

These comments only refer to RFC related topics in the draft ERTMS Deployment Action Plan.

REMINDER: ROLE OF RFC

The RFC is a cooperation of IM's. Regular meetings are held with various stakeholders:

- Executive Board / EC
- RAG
- TAG.

With the aim to develop rail freight on its lines, the main role of the RFC is to:

- be an dialog platform for all stakeholders
- Act as a alert maker & moderator for the issues raised by its stakeholders
- Act as a forum to address technical issues with impact on operations tackled by its stakeholders

In order to fulfil their role, RFCs steer working groups with their stakeholders on various topics, eg.

- ERTMS
- Capacity
- Coordination of works and temporary capacity restrictions
- ...

GENERAL COMMENT ON ERTMS DEPLOYMENT ACTION PLAN

The Executive Boards and the Management Boards of the RFC North Sea-Mediterranean and the RFC Rhine-Alpine (hereafter the RFC NSMED and RFC RALP) welcome the initiative from the European Commission and ERA on the principle to be consulted on the ERTMS Deployment Action Plan.

The RFC NSMED and RFC RALP wish to emphasise their commitment to provide support for a harmonised deployment of ERTMS on lines included in the RFC's itineraries.

In their functioning both RFCs seek to identify where and how it can provide added value for this coordination in accordance with national deployment plans. In this regard, both RFCs have set up a working group on ERTMS providing an information exchange platform for infrastructure managers (IMs) on resolution of issues encountered during the ERTMS implementation process on RFC's lines.

However, the regulatory provisions, agreements between RFC's Member States and between infrastructure managers as well as Memoranda of understanding have clearly defined the scope of the involvement of the RFC NSMED and RFC RALP in ERTMS deployment.

For this reason, the main responsibility of the RFCs regarding to ERTMS is to foster the cooperation between their stakeholders to support the consistency of the deployment along the RFC considering the general objective assigned to the RFCs to ensure interoperability along the corridor.

In that respect RFC NSMED and RFC RALP, through the involvement of stakeholders of the RFC (ministries, infrastructure managers, regulatory bodies, allocating bodies, national safety authorities, railway undertakings, terminal operators), provide a platform:

- to publish correct information on ERTMS requirements and planned timetable for the deployment along the corridor.
- to make its best efforts to contribute to identify non-interoperability issues such as missing links or challenges for IMs and RUs with ERTMS roll-out, having in mind the customer point of view (but will not be in charge of / or responsible for this)
- to make its best efforts to contribute to inform the appropriate authorities about the identified issues not addressed by other groups and to inform reversely the stakeholders about the solution proposed, (but will not be in charge of / or responsible for this)

This implies that the RFC is primarily a platform to exchange information. The RFC is less suitable for designing technical solutions, but can deploy adequate knowledge available with IMs and other railway stakeholders.

COMMENTS ON ACTIONS ORIENTED TO RFCs

Action	Description	Comments
3.1.1	ERA approval of trackside	The RFC NSMED and RFC Rhine-Alpine agree on the proposal taking into account its general approach as platform to identify issues along the corridor. However a distinction must be made between rail freight trains

		<p>running along the corridor and passengers trains for which RFCs are not the appropriate bodies as neither Reg. 913/2010, nor multilateral agreements provides such competence.</p> <p>In addition existing activities of other groups like the ERTMS Users Group on cross-border assessment have to be taken into account in order to avoid double work. Issues found can also be communicated via IMs participating in ERA WGs or the ERTMS users group which is preparing a guideline for cross-border installations.</p>
3.1.2	Addressing non-interoperable infrastructure	<p>We consider that ERA and/or RUs should inform RFC and / or IM's in case of identified difficulties on non-interoperable infrastructure and ask the RFC to act as a facilitator/moderator for bi-/multilateral discussions. The Management Board can collect the information from stakeholders and inform the appropriate authority. RAG could play a role to streamline the experiences from customers. However, RFC NSMED and RFC Rhine-Alpine are not competent to be involved as such in the baseline compatibility assessment (BCA) which should be done on national level or on bilateral level in case of cross border section. The RFCs could raise awareness to IMs and RU's.</p> <p>IMs of the RFC request that Baseline 2, and especially 2.3.0D version, should be kept in the next TSI version, in order to safeguard the investments made so far and protect the early implementers.</p>
3.1.3.	Resolving incompatibilities between trackside and OBU preserving the interoperability of the OBU	<p>ERA, as responsible for homologation of OBU and trackside, should be the relevant entity to determine possible incompatibilities and non-interoperability. Incompatibility problems between OBUs and trackside might come up during the testing phase (also with passenger traffic) and need to be solved in the testing phase between RUs, IMs, NSAs and the industry. If problems are reported by RUs, IMs or other stakeholders, the Management Boards of RFC NSMED and RFC RALP can inform the appropriate authorities. In that way RFC NSMED and RFC RALP can go along with the proposal to collect information.</p>
3.1.4.	Collect the data for the ERTMS roll out on the principal, diversionary and connecting lines to make an overview, relevant for the customers	<p>The RFC NSMED and RFC RALP can go along with the proposal to collect information, as it falls within the scope of the key RFC tasks and is part of the monitoring and reporting role. The Management Board can collect the information from stakeholders and inform the</p>

		<p>appropriate authority.</p> <p>A specific role regarding agreements on cross-border sections and consulting with RUs as proposed by the EU is not seen by the RFCs.</p> <p>RFC have developed information tools (CIP) that could make the ERTMS deployment more visible at an European level in the future.</p>
3.1.4.	Study the development of a plan making possible the run of non-class B equipped locos	The RFC NSMED and RFC RALP agree on customer oriented approach and it falls within the scope of the corridor. However, some line segments have no obligations of ETCS equipment and/or commitment given by the Member States, following the published ERTMS DP.
3.1.5.	Decommissioning class B systems	See above. The optimal date for removal of class-B systems depends highly on national specificities.
3.1.6.	Communication to ERA in case of the national rules which can have an impact on ERTMS	The RFC NSMED did a fit-gap analysis on national rules compared to the Appendix A of TSI OPE and collaborated with RFC RALP and other corridors to present it to ERA. ERA TSI OPE WG took over this task and integrated it in its WG. In the future, we consider this task under the responsibility of ERA, and RFC Network Group can act as a moderator / facilitator to collect, underline the potential identified additional issues communicated by its stakeholders, and inform the TSI OPE ERA WG.
3.1.7	Harmonisation of rules	We suggest to strengthen the role of ERA in order to facilitate the implementation of fully harmonized operation rules and correlated engineering rules, applicable in all European countries. RFCs can help to define them based on its return of experience.
3.2.1.	Authorisation of vehicle : inform ERA of any exported constraints on OBU due to a trackside or class B system	IMs can jointly request RFCs to assist ERA in defining the set of national interoperability test requirements Cf. additional remarks on 3.1.3
3.2.2	Minimising impacts on class B system interactions with OBU	See above

3.2.3	Contractual/commercial issues: production of structured template	CER has already undertaken the production of these templates. RFC NSMED & RALP suggest not to duplicate this work
3.5.	Funding/financing of ERTMS: trackside and on-board	Information on funding schemes can be given by MoTs and the EU in RAG meetings of RFC NSMED and RFC RALP. The RFC NSMED & RALP can promote such investments with support letters if appropriate requests from RUs for EU funding, as it was the case previously. In order to help to have a quick implementation, ERTMS subsidies should not be correlated to the decommissioning of class-B systems.