

# **POSITION PAPER**

Consultation on Revision of Technical Specifications of Interoperability relating Telematics Applications for Freight TAF TSI

Brussels, 21st of October 2013



# 1. REFERENCE DOCUMENT

 Preliminary draft 1.0 of the Technical Specifications of Interoperability relating Telematics Applications for Freight (TAF TSI) (ERA\_CON\_2013\_03\_INT)

## 2. INTRODUCTION

This Position Paper makes public the official CER beliefs and recommendations on and for the Technical Specifications of Interoperability relating Telematics Applications for Freight (TAF TSI)-Preliminary draft version 1.0. It recommends changes and amendments to be done, ensuring the deployment of a safe, sustainable, cost-efficient and reliable railway systems with all its subsystems included.

## 3. **GENERAL COMMENTS**

According to CER's expectations, the document gathers most of the input forwarded and the final result is satisfactory.

As a result of the CER analysis we ascertained eight (8) findings that are listed in the detailed comments section together with the suggestions for improvement. From these eight remarks, two of them are considered the most relevant.

It must be also stated that after TAF TSI revision the following points are still open:

- Compatibility check between rolling stock and infrastructure,
- Interface between TAF TSI System and RINF,
- Interface between TAF TSI System (e.g. RSRD) and Vehicle registers.

### 4. DETAILED COMMENTS

The two main remarks with the justifications are highlighted in this section.

## 1. Under section 4.2.1. Consignment Note Data

As proposed by the sector, a link must be added ...according to "Uniform Rules Concerning the Contract of International Carriage of Goods by Rail (CIM)", "Uniform Rules concerning Contracts of Use of Vehicles in International Rail Traffic (CUV) and valid national rules."

<u>Justification:</u> It is essential for the RUs to know that their business processes that are based on CIM/CUV will remain and TAF TSI will support this.

## 2. Under section 4.2.11. Various Reference Files and Databases

The sector strongly recommends the following text:

4.2.11. Various Reference Files and Databases

4.2.11.1. Reference Files

Locally stored and administrated:

• Reference File of the emergency services, correlated to type of hazardous goods.

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Centrally stored and administrated:

- Reference File of the Coding for all IM', RUs, Service provider companies,
- Reference File of all European operators including respective list of national safety certificates granted.
- Reference File of the Coding of Locations (Primary and subsidiary),
- Code lists reflecting TAF codes and codes from other domains are required and need to be stored and administrated.

<u>Justification</u>: As the sector currently store and maintain the reference files that shall be stored and maintained centrally, the text change that this will be done by ERA is not acceptable. A change of this responsibility and process will have negative impact on the implementation of the masterplan.

The centrally storage of reference files of the coding for freight customers was deleted from the list as previous agreement of the implementation discussion. It is not needed any longer because the customer ID is clearly given by the country code and the VAT number.

The rest of the remarks can be found in the Annex at the end of the document.

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## Annex I

### ERA\_TAF\_TSI\_Preliminary Legal Text

### 2.3.2. Considered Processes

This TSI for the railway freight transport industry is limited according to Directive 2008/57/EC [1] to IMs and RUs/LRUs with reference to their direct customers.

Under contractual agreement the LRU shall provide information to the Customer in particular:

- Path information.
- Train Running Information on agreed reporting points, including at least departure, interchange/handover and arrival points of the contracted transport.
- Estimated Time of Arrival (ETA) to the final destination including yards and intermodal terminals.
- Service Disruption. When the Lead RU learns about a service disruption, it shall deliver to the Customer in due time.

For the delivery of all this information, the respective TAF compliant messages are defined in chapter 4.

### 4.2.1. Consignment Note data

### 4.2.1.1. Customer Consignment Note

The Consignment Note has to be sent by the Customer to the Lead RU. It must show all the information needed to carry a consignment from the consignor to the consignee.

# 4.2.3. Train Preparation 4.2.3.1. General Remarks

If the train composition is changed at a location, this message must be exchanged once more with information updated by the RU responsible.

For the preparation of the train, the RU must have access to the infrastructure restriction notices, to the technical wagon data (Rolling Stock Reference Databases, chapter 4.2.10.2: The Rolling Stock

### **CER Proposal**

There is no Proposal of Modification for this change.

This text should be adjusted with the provision under 4.2.4.1 which was agreed in the WP

Under contractual agreement the LRU provides information to the Customer in particular:

# "4.2.4. Train Running Forecast 4.2.4.1. General Remarks

Under contractual agreement the LRU will provide Customer the Train Running Forecast and Train Running Information. The reporting points will be agreed by both parties within the contract."

# 4.2.1. Consignment Note data (TELEM00000220 + TELEM00000233) 4.2.1.1. Customer Consignment Note

The Consignment Note has to be sent by the Customer to the Lead RU. It must show all the information needed to carry a consignment from the consignor to the consignee according to "Uniform Rules Concerning the Contract of International Carriage of Goods by Rail (CIM)", "Uniform Rules concerning Contracts of Use of Vehicles in International Rail Traffic (CUV) and valid national rules."

The link to CIM and CUV should remain in the text as proposed. It is essential for the RU to know that their business processes that are based on CIM/CUV will remain and TAF TSI will support this.

CER expected that this text was deleted as it was done with comparable parts in other chapters. Whatever happened in the process (PM223) CER recommends to delete this text

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Reference Databases), to the dangerous goods reference file and to the current, updated information status on the wagons (chapter 4.2.11.2: Other Databases: The Wagon and Intermodal Unit Operational Database). This applies to all wagons on the train. At the end the RU must send the train composition to the next RUs. This message must also be sent from the RU to the IM(s) with whom it has booked a path section, when requested by the Conventional Rail TSI Operation and Traffic Management or by the contract(s) between RU and IM(s).

If the train composition is changed at a location, this message must be exchanged once more with information updated by the RU responsible.

At each point e.g. origin and interchange point, where the responsibility changes on the RU side, the start procedure dialogue between IM and RU "Train ready - Train Running Information" is obligatory.

# 4.2.4.3. Train Running Information message and Train Delay Cause Message

This message must be issued by the IM to the RU running the train upon:

- Departure from departure point, arrival at destination,
- Arrival and departure at handover points, interchange points and at agreed reporting points based on contract (e.g. handling points).

If the cause for the delay (first assumption) is provided it must be sent in the separate Train Delay Cause Message.

The definition of the mandatory structure of Train Running Information message and Train Delay Cause Message

and the elements to be followed are described on Annex II, Annex A, TAF TSI - Annex D.2: Appendix F - TAF TSI Data and Message Model [4].

# 4.2.10. The Main Reference Data 4.2.10.1. Preface

The Infrastructure Data (the Network Statements and the stored data in the Infrastructure Restriction Notice Database) and Rolling Stock Data (in the Rolling Stock Reference Databases and in the Wagon and Intermodal Unit Operational Database) are the most important data for the operation of freight trains on the European network. Both types of data together allow an assessment of the compatibility of the rolling stock with the infrastructure, help to avoid multiple data input, which increase especially the data quality, and they give a clear picture on all available installations and equipment at any time for fast decisions during the operation.

4.2.11. Various Reference Files and Databases

### **CER Proposal**

from the TAF TSI core text.

Otherwise the text must be edited

Should be added to be consistent

As there will be no Infrastructure Restriction Notice Database it should not be mentioned here. Our text proposal

# 4.2.11. The Main Reference Data 4.2.11.1. Preface

The Infrastructure Data and Rolling Stock Data are the most important data for the operation of freight trains on the European network. Both types of data together allow an assessment of the compatibility of the rolling stock with the infrastructure, help to avoid multiple data input, which increase especially the data quality, and they give a clear picture on all available installations and equipment at any time for fast decisions during the operation.

As the sector currently store and maintain

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#### 4.2.11.1. Reference Files

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Locally stored and administrated:

□ Reference File of the emergency services, correlated to type of hazardous goods.

The European Railway Agency will centrally store and maintain unique codes for the following reference data:

- Reference File of the Coding for all IM', RUs, Service provider companies,
- Reference File of the Coding for Freight Transport Customers.
- Reference File of the Coding of Locations (Primary and subsidiary),

Other code lists are defined in Annex II, Annex A, TAF TSI - Annex D.2: Appendix F - TAF TSI Data and Message Model [4].

### **CER Proposal**

the reference files that shall be stored and maintained centrally the text change that this will be done by ERA is not acceptable. A change of this responsibility and process will have negative impact on the implementation of the masterplan.

The centrally storage of reference files of the coding for freight customers was deleted from this list as previous agreement of the implementation discussion. It is not needed any longer because the customer ID is clearly given by the country code and the VAT number.

Therefore CER strongly recommends the following text.

4.2.12. Various Reference Files and Databases
4.2.12.1. Reference Files

Locally stored and administrated:

 Reference File of the emergency services, correlated to type of hazardous goods.

Centrally stored and administrated:

- Reference File of the Coding for all IM', RUs, Service provider companies,
- Reference File of all European operators including respective list of national safety certificates granted.
- Reference File of the Coding of Locations (Primary and subsidiary),
- Code lists reflecting TAF codes and codes from other domains are required and need to be stored and administrated.

This sentence should be deleted because the Common Interface should not mandatory for to access to databases; there are other suitable technical solutions. E.g. access to the CRD.

# 4.2.11.2. Other Databases

These databases must be accessible via the Common Interface (4.2.12.1: General Architecture and 4.2.12.6: Common Interface).

### 4.3.1. Interfaces with the TSI Infrastructure

The subsystem Telematic Applications for Freight uses the data required for operational purposes as given by the path contract, eventually updated in the restriction notice database, as provided by the IM. Thus no direct interface exists between this TSI and the TSI for infrastructure.

**4.3.1.** Interfaces with the TSI Infrastructure The subsystem Telematic Applications for Freight uses the data required for operational purposes as given by the path contract **possibly completed by infrastructure restriction data**, as provided by the IM. Thus no direct interface exists between this TSI and the TSI for infrastructure.

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## Disclaimer

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