

Making the railway system  
work better for society.

## Document Review – Comment Sheet – Version F of 25/10/2021

*Document commented (name/version): RECOMMENDATION ERA-REC-122 OF THE EUROPEAN UNION AGENCY FOR RAILWAYS on the technical specification for interoperability relating to the subsystem 'telematics applications for passenger services' of the Union rail system, V2.0*

<i>Requestor:</i>	ERA
<i>Deadline for submitting comments:</i>	31/10/2021

	<i>Reviewer 1</i>	<i>Reviewer 2</i>	<i>Reviewer 3</i>	<i>Reviewer 4</i>	<i>Reviewer 5</i>
<i>Date:</i>	29.10.2021	29.10.2021	29.10.2021		
<i>Name:</i>	Müller	Möllmann	Mundo		
<i>Organisation:</i>	NCP Germany	NCP Germany (Retail)	NCP Germany		
<i>Email:</i>	ncp.de-taftap@deutschebahn.com				

### *Document History*

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1	29.10.2021	NCP Germany
0.2		

0.3		

*Conventions:*

<i>Type of Comment</i>		<i>Reply by requestor</i>	
<i>G</i>	General	<i>R</i>	Rejected
<i>M</i>	Mistake	<i>A</i>	Accepted
<i>U</i>	Understanding	<i>D</i>	Discussion necessary
<i>P</i>	Proposal	<i>NWC</i>	Noted without need to change

*Review Comments <if necessary add extra lines in the table>*

<i>N°</i>	<i>Reference (e.g. Art, §)</i>	<i>Type</i>	<i>Reviewer</i>	<i>Reviewer's Comments, Questions, Proposals</i>	<i>Reply</i>	<i>Proposal for the correction or justification for the rejection</i>
1.	4.2.18.2	P	NCP Germany	Delete the 3 <sup>rd</sup> paragraph as the requirement is described in the 6 <sup>th</sup> paragraph : 3 <sup>rd</sup> paragraph to be deleted: <b><del>Upon request this message must be issued by the infrastructure manager to station manager, ticket vendor and tour operator for contractually agreed reporting points.</del></b>		6th paragraph sufficiently addressing the issue:  Information on the train running forecast, and if relevant on the train delay reason (see section 4.2.18.3), shall be delivered by the railway undertakings and/or infrastructure managers in due time to the station manager , ticket vendor and tour operator under the conditions in article 10 of regulation (EU) 2021/782.  The infrastructure managers need to have flexibility to decide how to ensure the most effective and efficient way to inform passengers.

<i>N°</i>	<i>Reference (e.g. Art, §)</i>	<i>Type</i>	<i>Reviewer</i>	<i>Reviewer's Comments, Questions, Proposals</i>	<i>Reply</i>	<i>Proposal for the correction or justification for the rejection</i>
2	4.2.19.2	P	NCP Germany	Adjust the way of addressing the duties (using the meaning in the wording of 4.2.18.3)  "Additionally the infrastructure manager has to ensure the provision of information on the train running interruption <del>the Train Running Interruption</del> message to the railway undertakings, station manager, ticket vendor and tour operator under the conditions in article 10 of regulation (EU) 2021/782".		The wording may prevent the infrastructure manager from choosing the most efficient and effective solution under the conditions in article 10 of regulation (EU) 2021/782.

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
3.	7.1(b)	P	NCP Germany	<p>Delete the date 07/06/2023 and adjust the wording.</p> <p>The date of implementation for stakeholders without individual master plan is fixed by ERA to 07/06/2023, corresponding to the application date of rail Passenger Rights Regulation (EU) 2021/782.</p> <p>The logic of this date is understood concerning rail PRR requirements but :</p> <ul style="list-style-type: none"> <li>• Rail PRR mentions already this date. Thus, repeating it for rail PRR requirements described in TAP TSI brings no added value as the rail PRR is mandatory in any case.</li> <li>• It applies also to RU/IM BPs non linked to rail PRR, some of them involving IMs, e.g. BP 4.2.16 (Path request and path allocation) or BP 4.2.17.1 (Train ready). Such decision was taken by the TAF Revision WP.</li> </ul>		<p>It is fully unacceptable</p> <ul style="list-style-type: none"> <li>- <i>that PRR determines timelines of non-PRR related subjects</i></li> <li>- <i>not to take into account originally agreed time schedules without consultation of the sector</i></li> </ul> <p>Only a proposal with legal and economic impact assessment can be deemed acceptable.</p> <p>National implementation deadlines on the part of the infrastructure managers are of particular relevance for train path requests.</p> <p>Linked to this are the implementation deadlines of the railway undertakings.</p> <ul style="list-style-type: none"> <li>- <i>The topic is too extensive and complex to be introduced completely by a fixed deadline, so the German sector advocates for an individual and gradual introduction.</i></li> <li>- <i>For the German sector there is only one logical date for changes, being the new timetable year.</i></li> </ul> <p>(</p>

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
4	7.1(c)	P	NCP Germany	<p>In the enumeration of ICG tasks, the 4<sup>th</sup> bullet is included in the 5<sup>th</sup> bullet.</p> <p>4<sup>th</sup> bullet to be deleted:</p> <p><i>The ICG is made responsible for:</i></p> <ul style="list-style-type: none"> <li>– <i>assessing the progress of implementation and operation, analysing the deviations from the Master Plan and proposing improvement actions;</i></li> <li>– <i>assisting the NCPs to follow-up the TAF and TAP TSI implementation and operation at national level;</i></li> <li>– <i>approving the reports about the TAF and TAP TSI implementation and operation;</i></li> <li>– <del><i>reporting to the European Commission and to the TAF/TAP Steering Committee.</i></del></li> <li>– <i>reporting via the Agency <del>who reports</del> to the European Commission, and to the Telematics Advisory Committees.</i></li> <li>– <i>Discuss and agree with NCPs any need for additional supporting actions from ERA, Member States or NCPs from the annual TAF TSI or TAP TSI implementation reportings.</i></li> </ul> <p><i>The implementation related to Retail is monitored by the TAP ICG.</i></p>		The proposed changes have not been discussed properly and have not been agreed with the NCPs. The proposal needs to be adjusted.

5.	Appendix II - Glossary	P	NCP Germany	Proposal of a slight update of the definition (to be copied in TAF where it is missing).  <i>The National Allocation Entity (NAE) <b>allocates</b> <b>Primary ensures the uniqueness of Location Codes</b> <del>and maintains a list of unique location codes</del> within a country.</i>		The NAE should be measured solely by the uniqueness of primary location codes as well as the capability to follow its own processes. Moreover, it should have the greatest possible freedom in carrying out its mission.
----	---------------------------	---	----------------	---	--	--

Note: This table could be changed according to the requestor's needs

Please read carefully the Privacy Statement below before submitting your comments.

<http://www.era.europa.eu/Pages/Privacy-Statement-Agency-Consultations.aspx>

I have read the Privacy Statement and I accept the processing of my personal data under Regulation (EC) 45/2001.

I accept that the comments I have submitted can be published on the ERA website along with:  my name  my e-mail address

[ncp.de-taftap@deutschebahn.com](mailto:ncp.de-taftap@deutschebahn.com)

Stefan Müller / Jan Möllmann / Oliver Mundo