EUROPEAN
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AGENCY
FOR RAILWAYS

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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

Requestor:	ERA
Deadline for submitting comments:	31/10/2021

	Reviewer 1	*Reviewer 2*	*Reviewer 3*	*Reviewer 4*	*Reviewer 5*
Date:	25.10.2021				
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Document History

Version	*Date*	*Comments*
0.1	25.10.2021	JSG/CSG comments Version F of 25/10/2021
0.2		

0.3		

Conventions:

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

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

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
1.	4.2.18.2	P	JSG/CSG	Delete 'who is running the train' in the first sentence as it is the role of the responsible RU and to align with TAF : *This message must be issued by the IM to the ResponsibleRU, who is running the train, for handover points, interchange points, stations, train destination and other agreed reporting points as described in Chapter 4.2.18.1.*		

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2.	4.2.18.2	P	JSG/CSG	Delete the 3rd paragraph as the requirement is described in the 6th paragraph : 3rd paragraph to be deleted: *Upon request this message must be issued by the infrastructure manager to station manager, ticket vendor and tour operator for contractually agreed reporting points .* 6th paragraph sufficiently addressing the issue: *Information on the train running forecast, and if relevant on the train delay cause (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.*		

| 3. | 4.2.19.1 | P | JSG/CSG | To handle passengers complaints according to PRR the storage of Train Running information is sufficient.

The storage of "service disruption" is useless to deal with passengers' complaints. Relevant information is provided via "Train running information" which is already proposed to be stored in ERA Recommendation clause 4.2.18.1.

The ERA TAP Revision WP (01.06.2021) agreed/decided to delete the paragraph :

~~*For the purpose of dealing with passengers' complaints, service disruption data shall be kept available by the infrastructure manager for railway undertakings, ticket vendors and/or authorised public bodies for at least twelve months after such data has expired.*~~

Clause 4.2.18.1 already addresses efficiently the need to store information for the purpose of passengers' complaints:

For the purpose of dealing with passengers' complaints, the train Running Information data:
- *Train identification (train number) and Train ID,*
- *reporting location,*
- *actual date/time,*
- *delay*
- *delay cause, if any*

shall be kept available by the Infrastructure manager for Railway Undertakings, ticket | | |

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				vendors, tour operators and Authorised Public Bodies for at least twelve months after the service train termination.		
4.	4.2.23.5	P	JSG/CSG	In the TAP Revision WP (01.06.2021) it was agreed/decided to indicate who is responsible of the management of the central database. This sentence disappeared in the TAP TSI for social consultation. It should be added as follow: ***The management of the central repository should be under the responsibility of a non-commercial co-European organisation.*** *Where the Central Repository is in use in conjunction with the TAF TSI, development and changes shall be performed as closely as possible to the implemented TAF TSI in order to achieve optimum synergies.*		

| 5. | 7.1(b) | P | JSG/CSG | 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.

The logic of this date is understood concerning rail PRR requirements but :

• 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.
• 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.

In addition, during the TAP Revision WP (01.06.2021) it was NOT agreed/decided that the individual master plan will be published by ERA

The paragraph in TAF TSI and TAP TSI must be aligned by using the TAF TSI wording ensuring consistency of requirements for RU/IM communication described in TAF TSI, but also referenced in TAP TSI.

If text should be changed in TAP TSI compared to TAF TSI text, request for a joint TAF & TAP WP meeting dedicated to the revision of the TSI text related to 'Development of the system'. | | |

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				Also, "master plan" should be replaced by "TAF/TAP implementation reporting as described in 7.1(c)". Today, the implementation reporting is the tool for stakeholders to update their masterplan, also fostering the participation to the reporting, the implementation reporting could be used by stakeholders to create their master plan for those with any. Revised text should be as follow: *7.1(b) Development of the system* *All railway stakeholders concerned shall deploy the system following their individual* ~~*master plan*~~ **TAF/TAP implementation reporting as described in 7.1(c**) ~~*or, if no individual master plan has been submitted, until 7 June 2023. The individual master plan shall be published on the website of the Agency*~~.		

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6.	7.1(c)	M	JSG/CSG	In the enumeration of ICG tasks, the 4th bullet is included in the 5th bullet. 4th bullet to be deleted: *The ICG is made responsible for:* – *assessing the progress of implementation and operation, analysing the deviations from the Master Plan and proposing improvement actions;* – *assisting the NCPs to follow-up the TAF and TAP TSI implementation and operation at national level;* – *approving the reports about the TAF and TAP TSI implementation and operation;* – ~~*reporting to the European Commission and to the TAF/TAP Steering Committee.*~~ – *reporting via the Agency ~~who reports~~ to the European Commission, and to the Telematics Advisory Committees.* – *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.* *The implementation related to Retail is monitored by the TAP ICG.*		
7.	Annex IV	G	JSG/CSG	Complete the list with ERA TD B.13 and B.14.		

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8.	Appendix II - Glossary	G	JSG/CSG	The Glossary should be checked vis-à-vis the output of CR 382. Hereafter some proposals on the Glossary, not exhaustive.		
9.	Appendix II - Glossary	P	JSG/CSG	Proposal of a slight update of the definition (to be copied in TAF where it is missing). *The National Allocation Entity (NAE)* ~~*allocates Primary*~~ *ensures the uniqueness of Location Codes* ~~*and maintains a list of unique location codes*~~ *within a country.*		
10.	Appendix II - Glossary	P	JSG/CSG	Update the definition of Primary Location Code *Primary Location Codes (PLCs) identify locations on a railway network.* ~~*The Infrastructure Manager owning the railway network manages the PLCs.*~~ *These are normally important locations, where trains start, end, stop, run through or change line. **A Primary location is identified by a single and unique Primary Location Code.***		

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11.	Appendix II - Glossary	P	JSG/CSG	Add a definition of Subsidiary Location Code as it is quoted in the core text. ***A Subsidiary Location must be linked to, and be part of a single Primary Location. It may specify in a more detailed way a point, attributes or an usage of Primary location. A Subsidiary Location is identified by a unique Subsidiary Location Code (SLC).***		

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

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