



Brussels, 16 December 2024

Position to be added to the Accompanying Report

Introduction

CER welcomes the amendments to the TSI CCS and the improvements they bring. We support the work that has been done by all involved parties and would like to thank the European Railway Agency for providing us the opportunity to contribute and to help to move the European railway sector forward.

Nevertheless, it is our position that there are still some points that need to be improved. We kindly ask the members of the RISC to consider the following points.

1. Homogeneous fleet / Transition Regime (CR643)

The TSI CCS 2023 (appendix B) phases out SV2.0, set #2 and SV2.1, set #3. For newly built vehicles SV2.0 and set#2 are allowed until 1.1.2030, set#3 until 1.1.2032.

The TSI CCS includes the words 'an implementation requirement within the production phase can impact the overall planning of a vehicle project.'

Where the phasing out of SV2.0, set #2 and SV 2.1, set #3 impacts the fleet planning of CER members, there is a specific impact on the overall planning which is considered most unreasonable.

That impact occurs when the modification of the series of a vehicle exceeds the end date of 1.1.2030 or 1.1.2032. It means that the remaining part of the series cannot be finished and should be equipped with a newer or higher version of ETCS. The result is that the series will be cut in two, with two types, e.g. with ETCS SV2.0 and SV2.1.

'Homogeneous' use of the series is not possible anymore. The word 'homogeneous' refers to technology and operations. Alternatively, to keep a homogeneous fleet, the whole series or fleet need to be modified to the newer version. These modifications are expected to be very costly, requiring hardware modifications and new authorisations. If the modification cannot be planned according to the needs of the railways, e.g. a few years before the modification for FRMCS is possible, then the return on investment is none.

The CER request to extent the production phase dates (1.1.2030/2032) up to 4 years was rejected by ERA and EC. However, CER maintains its position that RU are able to manage in a pragmatic and economic way their own industrial roll-out to implement both ETCS and RMR. If not supported by the TSI, the non-application of the TSI as provided by the interoperability directive can keep the fleet economically viable.

2. ERA Resources and Process

The process to deliver the Amendments and missing Subsets is too long, whilst part of the set deadlines cannot be met. This and delays on other tasks (error corrections BCA) impedes our business. We support ERA and EECT to improve the process, e.g. by more resources as requested by ERA and/or the use of tools for improved requirement management. In the meantime, these amendments should be classified as TSI deficiencies (article 6 of IOD) in order to make these clarifications available to all stakeholders before the entry into force of the amendments.

3. Appendix E:

The purpose of Appendix E is to translate the terms that can be displayed on the DMI in a standardised way for the respective language area, which is very welcomed by us. In

this case, however we do not understand why this amendment has not created consistency with the mandatory DMI document (ERA_ERTMS_015560), e.g. why missing terms have not been added (e.g.: "SR distance (m)", according to §11.3.10.6, figure 126).

4. Special Brakes / Partial Fulfilment

CER aims to allow pragmatic solutions until fully standardised products at low costs are available, not to introduce variants. Moreover, ERA should prioritize the reduction of errors instead of preventing the use of non-standardized EVC/products where functions are missing that are not installed on the vehicle. It is more pragmatic to implement products adapted to the individual characteristics of the vehicles (e.g. non electrified vehicles, vehicles without special brakes, etc.) and special vehicles.

Concerning the reduction of errors triggered, we strongly suggest to further improve the applied methods, for example by adopting new requirement management tools, verification, validation, and testing of CR (we absolutely need to prevent any errors triggered by new CR, e.g. CR1344). Correcting errors on a vehicle in operation creates more burden for the operators than having a not fully standardised EVC e.g. regarding ENE-functions and special brakes.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 78% of the rail network length, 81% of the rail freight business and about 94% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter [@CER_railways](https://twitter.com/CER_railways) or [LinkedIn](https://www.linkedin.com/company/cer).

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