

Comment on Draft Recommendation 006REC1078

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Chapter 4.2.1.3; Paragraph (a) (1):

It should be made clear, that cables are not subject of this requirement.

Chapter 4.2.1.3; Paragraph (a) (3):

In accordance with paragraph (a) (1) a classification should be set according table 4 of commission delegated regulation 2016/364, suggested B2ca s1 d1 a1 according German preliminary VDV-Schrift 515 (2018). Otherwise, this requirement is not testable.

Chapter 4.2.1.3; Paragraph (b):

It should be set clear, what means "fire load" in terms of cables, because fire reactions of cables are flammability, fire spread, toxic substances and smoke.

Chapter 4.2.2.1:

It is not clear, which requirements are to be applied for tunnels equal or less than 5 km length:

Is it allowed to divide in segments? If yes, is it necessary to switch off the traction energy supply of each segment?

From our point of view it should be set as "This specification applies to all tunnels".

Chapter 4.2.2.1; Paragraph (a):

According the new regulation it is no longer required to divide tunnels into sections. This is a major change. We are wondering why tunnels up to now have to be divided and this requirement will be no longer valid. Please, could you give us the reason why?

It seems to be better to identify the reason and the target of segmentation of overhead lines or conductor rails in coordination with the emergency plan. We suggest to revise this paragraph accordingly.

Chapter 4.2.2.2:

We are wondering why the paragraph (c) was deleted. Please, could you give us the reason why?