Document Review – Comment Sheet

Document commented (name/version):

|  |  |
| --- | --- |
| Requestor: | ERA |
| Deadline for submitting comments: | 19 October 2019 |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | Reviewer 1 | Reviewer 2 | Reviewer 3 | Reviewer 4 | Reviewer 5 |
| Date: | 14 October 2019 |  |  |  |  |
| Name: | Miroslav Haltuf |  |  |  |  |
| Organisation: | UNIFE |  |  |  |  |
| Email: | miroslav.haltuf@ext.oltisgroup.cz |  |  |  |  |

*Document History*

|  |  |  |
| --- | --- | --- |
| Version | Date | Comments |
| 0.1 | 14 October 2019 |  |
| 0.2 | 26 November 2019 | Commented by ERA |
| 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. | Chapter 2.1. a)b)  | U | Miroslav Haltuf | Definition of wording "Telematics applications for passenger services" should be clearly described; the Transport Service used in the definition is not sufficient to understand the scope of “Passenger services”.It is necessary to clearly define this part of the subsystem in order to eliminate and reduce overregulation caused by non-transparent and unclear interpretation. | R | This wording is used in the DIRECTIVE (EU) 2016/797. No change possible |
| 2. | Chapter 2.1.Sentence “It includes the provision of information on the following aspects:b)  | U | Miroslav Haltuf | Unclear – because it is not known if the sentence means the systems related to RU (retailer) – passenger communication, the RU-RU communication or any other form of communication | R | This wording is used in the DIRECTIVE (EU) 2016/797. No change possible |
| 3. | Chapter 2.1.Sentence “It includes the provision of information on the following aspects:c) | G | Miroslav Haltuf | This service is already not used generally | R | This wording is used in the DIRECTIVE (EU) 2016/797. No change possible |
| 4. | Chapter 2.1.See comment in the Document text | M | Miroslav Haltuf | Something is missing in the text or formatting is incorrect; the text of this article supports the overregulation.  | R | No change of the TAP TSI for this point, there is no missing text or incorrect formatting |
|  | Chapter 2.1.2 | U | Miroslav Haltuf | Needs to be clarified – to reduce overregulation | R | The chapter specifies in more detail who has to exchange reservation and payment data. The chapter is needed to define the affected parties for the reservation and payment systems.  |
|  | Chapter 2.1.3 | G | Miroslav Haltuf | I am not sure, if this article is still relevant. | R | ERA is aware about the limited offer of the service “registered luggage” by the railway undertakings. However it is part of the requirements in ANNEX II 2,6 (a) of DIRECTIVE (EU) 2016/797. No change possible. |
|  | Chapters 3.3.1 – 3.3.5 | G | Miroslav Haltuf | This chapters need to be revised and updated in order to ensure reduction of regulatory topics | R | Those chapters are necessary defining the link between the essential requirements and the corresponding chapters in the TAP TSI. They cannot be omitted.  |
|  | Chapter 4.1 | U | Miroslav Haltuf | The text of subchapters in the 2nd article is unclear; the information with passengers´ relevance and other communication (RU-RU or RU-IM) are mixed. The information with passengers´ relevance relevant for this Regulation are in 4.2.1, 4.2.4, 4.2.6 to 4.2.9, 4.2.11, 4.2.18. The other are relevant for RU-IM or RU-RU communication.   | T | ERA needs a mandate for such a revision. This is not in scope of the current revision of the TAP TSI.The TAP TSI specifies the basic parameter for ticketing. Therefore the ticketing security has to be accommodated here. A cybersecurity TSI does not exist (yet). |
|  | Chapter 4.2.2 | G | Miroslav Haltuf | Not relevant for regulation. Passengers have to receive available tariff data (price) when making a reservation including services related to a found connection. The tariff data necessary for ticket vendors are subject of commercial agreements between RUs. | R | To inform the passengers about the applicable tariffs those have to be made available to other railway undertakings and to authorities, checking the correct application of the passenger rights regulation. This is only possible if such a dataset is made available. |
|  | Chapter 4.2.3 | M | Miroslav Haltuf | This chapter is not relevant for regulation. The dataset will be a part of the commercial agreement between RUs and/or ticket vendors. | R | The data set for the contact details are needed for the passengers to identify the railway undertaking responsible for the transport contract or acting as carrier on a part of his journey. Railway undertakings are identified by a 4-digit company code. Therefore the data set has to be made available. |
|  | Chapter 4.2.4 | M | Miroslav Haltuf | This chapter, as it is, is out of the scope of the Regulation. See comments to each subchapter. | R | This chapter fulfils the requirements stemming from the Regulation 1371/2007 (Rail PRR), Annex II. The general conditions applicable to the contract have to be provided to the passenger.  |
|  | Chapter 4.2.4.1 | G | Miroslav Haltuf | This information has to be available when making the reservation or at least during the ticket issuing. Simplification of this chapter is necessary. | R | This chapter fulfils the requirements stemming from the Regulation 1371/2007 (Rail PRR), Annex II. The general conditions applicable to the contract have to be provided to the passenger before his trip. |
|  | Chapter 4.2.5 | G | Miroslav Haltuf | Not necessary to be regulated – service type is generally not provided. It is important to unified the conditions of “cabin” luggage valid generally | R | ERA is aware about the limited offer of the service “registered luggage” by the railway undertakings. However it is part of the requirements in ANNEX II 2,6 (a) of DIRECTIVE (EU) 2016/797. No change possible. |
|  | Chapter 4.2.6 | G | Miroslav Haltuf | A need for facilitation of transport of PRM is essential. The unified rule without “national specifics” is important  | NWC | Unified rules for PRM are not in scope of the TAP TSI. |
|  | Chapter 4.2.6.3 | G | Miroslav Haltuf | This comment is the same also for next chapters about transporting bicycles, cars, etc. Reformulation of those 2 articles is needed: the conditions and obligations have to be included if the RU uses IT systems for reservations and ticket sales. Passengers have to receive all relevant information in one single package. | R | The business process (a) to inform the passenger about the conditions of carriage for PRM, bikes, cars has to be treated separately from the business process (b) reservation of those services, see 1371/2007 (Rail PRR), Annex II. Therefore the both parameters shall remain separated. However the issuing railway undertaking or ticket vendor may deliver such a single package, based on TAP TSI, at their discretion. |
|  | Chapter4.2.7 | G | Miroslav Haltuf | Unification of conditions seems to be the most important. | NWC | Unified rules for bike transport are not in scope of the TAP TSI. |
|  | Chapter 4.2.7.1 | G | Miroslav Haltuf | The sentence “the fares for the carriage of bicycles” - To be an integral part of the reservation | R | Reservation of bike places is not always needed. Therefore reservation and price for a ticket are different concerns. |
|  | Chapter 4.2.10 | G | Miroslav Haltuf | This chapter needs to be revised and security elements have to be described in a dedicated new TSI.  | R | The TAP TSI specifies the basic parameter for ticketing. Therefore the ticketing security has to be accommodated here. A cybersecurity TSI does not exist (yet). |
|  | Chapter 4.2.10.2 | G | Miroslav Haltuf | A necessity to split the part related to passengers for the part related to RU-RU communication. The entire process has to be the same in each country without a national specifics applied. It is relevant for next chapters, too. | R | This chapter is not related to RU-RU communication for operational messages, but to the requirements for ticketing. |
|  | Chapters 4.2.11.1 to 4.2.11.4 | G | Miroslav Haltuf | These chapters need to be revised – from the “relevance of being regulated” point of view. | R | According to the regulation (EU ) 1371/2007 (Rail PRR), Annex II Passengers have to be informed about the “Time schedules and conditions for the lowest fares”. Therefore the provision of the datasets, needed for the information of the passengers has to remain in the TAP TSI regulation.  |
|  | Chapter 4.2.12.1 | G | Miroslav Haltuf | The chapter need to be revised and re-formulated according to the responsibility of issuing the basic information – e.g. depending to IM (green highlighted), and to RU (blue highlighted). Similar to the vehicle area information.**The ETA information for passengers is missing** See comments in the Document text | R | The information of the passenger about the arrival and departure of trains is a task assigned to the station manager. He has to ensure that the necessary information from the IM is available for him.ETA is available already, named as “- Deviation from plan”.  |
|  | Chapter 4.2.13.1 | G | Miroslav Haltuf | The information the arrival platform (track) and the exit from the train, about track change (platform change) is missing. Also the assured or missed connections (in case of connecting trains) information is missing. | T | The arrival platform or track will be proposed to be incorporated. |
|  | Chapters 4.2.14 – 4.2.19  | G | Miroslav Haltuf | Chapters 4.2.14. – 4.2.19 should be revised and moved to a dedicated RU-IM communication TSI.  | R | ERA needs a mandate for such a revision. This is not in scope of the current revision of the TAP TSI. |
|  | Chapter 4.2.20 | G | Miroslav Haltuf | To be valid only for RU (Vendor) – passenger communication. In other communication modes the RU-IM TSI.  | R | ERA needs a mandate for such a revision. This is not in scope of the current revision of the TAP TSI. |
|  | Chapter 4.2.21 | G | Miroslav Haltuf | This chapter needs to be revised and simplified from the overregulation point of view.  | R | Chapter has been revised together with the TAF TSI.  |
|  | Chapter 4.2.21.1 | P | Miroslav Haltuf | The text “The Information Exchange Architecture favors a mostly Peer-to-Peer type of interaction between all actors, while guaranteeing the overall integrity and consistency of the rail interoperability community by providing a set of centralized services.A Peer-to-Peer interaction model allows the best distribution of costs between the different actors, based on actual usage and, in general, will pose fewer scalability problems” is proposed to be replaced by following sentence:**“The Information Exchange Architecture is based on continuous open access state-of–the –art development in the IT sector which has to be covered with the highest possible level of cyber security. The interaction between all players must guarantee the overall integrity and consistency of the rail interoperability providing a set of centralized services. “** | R | Chapter has been revised together with the TAF TSI. |
|  | Chapter 4.3. | G | Miroslav Haltuf | A need for deep revision. | A | The chapter will be revised and the references to the correct chapters of the LOC&PAS TSI will be corrected.  |
|  | Chapters 4.2.-4.8 | G | Miroslav Haltuf | A need for a partly deep revision. | A | Chapter 4.3 will be revised. |
|  | Chapters 5 and 6 | G | Miroslav Haltuf | Need a deep revision from the overregulation point of view. | R | Chapter 5 has no relevance for the TAP TSI as stated in chapter 5.3\_”No interoperability constituents are determined as far as the subsystem 'Telematics applications for passengers' is concerned.”  |
|  | Chapter 7 | G | Miroslav Haltuf | This chapter is no more necessary to be an integral part of the Regulation | R | Chapter 7 has been revised in the TAP TSI to describe the new requirements for the implementation of the TAP TSI. |
|  | Chapter 8 | U | Miroslav Haltuf | Needs to be revised deeply and some terms need to be re-defined. See the highlighted terms in the Document text especially.Definition of train needs to be added.  | A | Glossary will be revised to incorporate the requirements from the revised TSI. |
|  |  |  |  |  |  |  |

*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*](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