EUROPEAN UNION AGENCY FOR RAILWAYS

Making the railway system
work better for society.

Document Review – Comment Sheet

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:	United Kingdom
Deadline for submitting comments:	31/10/2021

	Reviewer 1	*Reviewer 2*	*Reviewer 3*	*Reviewer 4*	*Reviewer 5*
Date:	08/10/2021	20/10/2021	29/10/2021		
Name:	C Queree	N Orr	P Coverdale		
Organisation:		Translink	Department for Transport		
Email:	chris@queree.co.uk		peter.coverdale@dft.gov.uk		

Document History

Version	*Date*	*Comments*
0.1	08/10/2021	Comments provided by C Queree
0.2	20/10/2021	Comments collated by N Orr following wider consultation internally within Translink

0.3	29/10/2021	Comments received from UK stakeholders collated into a single UK response

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
				Comments provided by C Queree		
1.		G	C Queree	Open Sales and Distribution Model is the new architecture developed by the UIC that will be included in the revised TAP-TSI as a system for transport ticket booking. The architecture is in outline based on retailers looking to allocators/inventory holders for prices and availability on services provided by rail and other carriers. It would appear that the way that allocators/inventory holders are chosen by retailers for specific passenger journey enquiries needs further work. Particularly in urban cases, the organisation responsible for prices and services will be a public transport authority, not normally involved as a party directly participating in rail ticketing systems. In addition, carriers may provide third parties with inventory for them to sell on their own account, much like in the air industry. For passengers to be offered the best and cheapest tickets for their journey and circumstances, especially multi-modal end-to-end journeys, it is vital that these allocators/inventory holders can be accommodated in OSDM and a data driven mechanism developed to ensure that they can be asked for prices when they have prices to offer.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
2.		G	C Queree	The architecture for ticket control needs to be federated, so railways and communities of railways can decide for themselves, using the ERA Technical Document specs, how to organise their control databases. There should be no assumption of a single control database. In addition, while there will be common key management for EU RUs, the process for getting and using keys across the EU border in both directions needs consideration.		
3.		G	C Queree	The railways have promoted the use of AZTEC 2D barcodes as they in earlier days were better read on moving trains. However, most industries now use QR 2D barcodes and mobile phones generally have QR barcode decoders as standard, not the case for AZTEC. The current TAP-TSI revision is a good time to change from specialised AZTEC to universal QR encoding.		
Comments provided by Translink						
1.	4.2.1.2	P	NO	Request that the 12-month time frame for meeting compliance is removed, as compliance should align with Member States' existing plans.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
2.	4.2.2.1, 4.2.7.2, 4.2.7.3, 4.2.9.1, 4.2.9.2, 4.2.10.1, 4.2.12.2	G/U	NO	Technical document B.13 (see Annex IV) is cited although Annex IV does not include B.13 on the 'list of technical documents referenced in this TSI'. The content of B.13 is unknown. Request clarification regarding the reference to B.13 and that B.13 be made available for review. It is not possible at this stage to fully assess the impact of these clauses.		
3.	4.2.11.3, 4.2.11.4	U	NO	The wording of the clauses makes reference to 'fulfilment on one of the following methods', but no methods are described. It is therefore unclear how the requirement is to apply. Clarification regarding which methods are being referred to by the requirement is requested. This needs to be clearer in the TSI text.		
4.	4.2.12.1	G/U	NO	Technical document B.14 (see Annex IV) is cited although Annex IV does not include B.14 on the 'list of technical documents referenced in this TSI'. The content of B.14 is unknown. Request clarification regarding the reference to B.14 and that B.14 be made available for review. It is not possible at this stage to fully assess the impact of these clauses.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
5.	4.2.23.5	U/P	NO	The draft does not state the functions that shall employ PKI and the use of a CA. It is therefore not possible to determine how the new requirements are to be complied with. It is expected that this relates to the context of communication with other parties, but this should be stated. Propose that ERA clarifies for what functions PKI and the use of a CA should be employed.		
6.	6.2.1	U	NO	Please confirm that this clause is not intended to require entities to seek assessment. Clause should be reworded accordingly.		
7.	4.1	G/U	NO	The text under the **'general remarks on the RU/IM message structure'** subheading is poorly worded, in particular the control data bullet point does not make sense. Request clarification regarding the RU/IM message structure requirements.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
8.	4.3.1.2	G/M	NO	There is a typo for the word 'station'. The pronoun 'he' is used which is inconsistent with the rest of the document where no pronouns are used. The last sentence of paragraph 1 is worded poorly. The last sentence of paragraph 5 doesn't read well, the word 'the' is used twice, and the word 'enforcement' is misspelt. The first sentence in paragraph 6 includes a typo for 'therefore' and the text does not make clear where to find the technical document that is cited.		
9.	4.2.2.1	G/M	NO	Paragraph 6 does not read well as it is too wordy and the requirement is difficult to understand. Clarification required regarding tariff data exchange requirements.		
10.	4.2.6.2	U/M	NO	Bullet point 1 about the conditions of access does not make sense - 'whether it is staffed for PRM support' would read better. The clause refers to the CEN/TS 16614-1:2014. All other references to this standard are to the 2020 revision. Is it intentional that two different versions of the same standard are referenced in the draft TSI.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
11.	4.2.12	U	NO	Paragraph 2 is poorly worded and difficult to understand. Clarification required about the handling of ticket control and ticket state modification data requirements.		
12.	4.2.17	M	NO	Paragraph 2 missing the word 'the' for 'on the basis of' Paragraph also poorly phrased.		
13.	4.2.18.1	U	NO	The second sentence of paragraph 6 is poorly worded. Further clarification regarding the information exchange between the RU and IM required.		
14.	4.2.18.3	U	NO	Paragraph 2 is poorly worded. Request clarification regarding the procedure for issuing the train delay message.		
15.	4.2.21.2	U	NO	The sentence is difficult to understand, and the requirement is unclear. Request clarification regarding additional requirements concerning databases		
16.	4.2.24	U/M	NO	Bullet points 1 and 3 have two full stops. Poor phrasing throughout.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
17.	4.3	M	NO	Refers to Conventional Rolling Stock TSI which has been superseded. Clarification required.		
18.	6.2.1	U	NO	Final paragraph is poorly worded.		
19.	7.1	U/M	NO	Section (a) in paragraph 2 includes a typo and should read 'as follows'. Section (b) is poorly worded and ends with two full stops.		
20.	7.2.2	M	NO	Paragraph 1 does not make sense as it refers to technical documents in Annex III which is incorrect as Annex IV is the list of technical documents. The sentence is poorly worded and is confusing as a result.		
21.	Annex IV	M	NO	Technical documents B.6 and B.7 are listed in the annex but are not cited at all in the main body of text.		
22.	Annex VI	M/U	NO	Annex VI is not referred to in the main body of text and neither is B.60. B.61 is mentioned on page 33 under section 7.1.(a) as the 'ERA TAP technical document B.61' although the reader must assume that this is referring to the document listed in Annex VI despite not citing the annex.		

N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
23.	General	G	NO	Multiple references to TAF TSI throughout document is this correct? (e.g. throughout 4.2.23 Networking and communication and from 4.4 onwards)		

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