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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

<i>Requestor:</i>	NCP IT
<i>Deadline for submitting comments:</i>	31/10/2021

	<i>Reviewer 1</i>	<i>Reviewer 2</i>	<i>Reviewer 3</i>	<i>Reviewer 4</i>	<i>Reviewer 5</i>
<i>Date:</i>	29/10/2021				
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Document History

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1		

0.2		
0.3		

Conventions:

<i>Type of Comment</i>		<i>Reply by requestor</i>	
<i>G</i>	General	<i>R</i>	Rejected
<i>M</i>	Mistake	<i>A</i>	Accepted
<i>U</i>	Understanding	<i>D</i>	Discussion necessary
<i>P</i>	Proposal	<i>NWC</i>	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.	Implementation 4	U		<p><i>“Each Member State shall ensure that a National Allocation Entity is appointed to be responsible for allocating unique location codes for each reference database and notifying all involved reference databases (e.g. Central Reference Database (CRD), Retail Reference Database (RRD)) of the update.”</i></p> <p>Therefore, there are at least two NAEs, one for CRD (e.g., Primary Location Codes), one for RRD (e.g., Retail Location Codes). Are there other NAEs?</p> <p>It could be useful to identify and define in Appendix II different NAEs with different names (e.g., NAE for CRD, NAE for RRD).</p>		
2.	Appendix VII, point (6)	U/M		<p><i>“Work with the Member State to ensure that an National Allocation Entity is appointed”.</i></p> <p>How do many NAEs have to be appointed? Only one? This sentence is not consistent with “Implementation 4”.</p>		

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3.	Appendix II	U		<p><i>“National Allocation Entity (NAE): The National Allocation Entity (NAE) allocates Primary Location Codes and maintains a list of unique location codes within a country”</i></p> <p>The definition is related to a specific NAE, that is the NAE for CRD.</p> <p>It should be necessary to define all the NAEs (see also comment n°1), the definition of only one NAE is not consistent with “Implementation 4”.</p>		
4.	Appendix II	U/M		<p><i>“Retail location code: Retail location codes identify locations on a railway network used for retail purposes (e.g., passenger information). The National allocation entity owning the railway network manages the retail location codes.”</i></p> <p>The definition is not clear:</p> <ul style="list-style-type: none"> • Considering that more than one NAE exist, which is this NAE? The NAE for RRD? • An IM (not a NAE) owns a railway network. Do this mean that a NAE shall be an IM? • According to the definition of the NAE, a NAE allocates codes. Does a NAE manage the codes too? 		

<i>N°</i>	<i>Reference (e.g. Art, §)</i>	<i>Type</i>	<i>Reviewer</i>	<i>Reviewer's Comments, Questions, Proposals</i>	<i>Reply</i>	<i>Proposal for the correction or justification for the rejection</i>
5.	New appendix	P		<p>It could be useful to create a new appendix for NAE (like appendix VII for NCP). This appendix should clarify some aspects related to NAE, for example:</p> <ul style="list-style-type: none"> • How do many NAEs exist? • The tasks to be undertaken by each NAE. • If there are some restrictions about the identification of a NAE. For example, could the incumbent railway undertaking be appointed as NAE for RRD? 		

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

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