European Railway Agency

Executive Director

OPINION

ERA/OPI/2014-2

OF THE EUROPEAN RAILWAY AGENCY

FOR

EUROPEAN COMMISSION

REGARDING

QUESTION AND CLARIFICATION NB RAIL - QC-INF-011

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1 General Context

1. In its letter MOVE B2/IV/fz Ares (2014) 5th March 2014 addressed to the Executive Director of the European Railway Agency ("ERA"), the European Commission requested ERA to prepare the technical opinion regarding the question/clarification of NB-Rail number QC-INF-011 concerning the assessment of the requirement "Platform height".
2. The QC-INF-011 was issued by NB-Rail Infrastructure Subgroup on 5th February 2014 and accepted at NB-Rail Plenary meeting on 5th February 2014. It relates to the interpretation of the requirements in clause 4.2.20.4 of the technical specification for interoperability relating to the 'infrastructure' sub-system of the trans-European high-speed rail system annexed to Commission Decision 2008/217/EC[1] ("HS INF TSI") and in clause 4.1.2.18.1 of the technical specification for interoperability relating to 'persons with reduced mobility' in the trans-European conventional and high-speed rail system annexed to Commission Decision 2008/164/EC[2] ("PRM TSI"). The issue raised therein relates to how the tolerances should be interpreted when assessing the requirement 'platform height' in the phases of "Design and developments" and "Constructed, before putting into service".

2 Legal Background

1. According to ***Clause 4.2.20.4 Platform height*** of the HS INF TSI, *"Lines of category I, II and III. The nominal platforms height above the running plane shall be either 550 mm or 760 mm, unless otherwise specified in section 7.3. The tolerances perpendicular to the running surface with reference to the nominal relative positioning between track and platform are -30 mm/+0 mm".*
2. According to ***Annex B1 Assessment of the infrastructure subsystem*** of the HS INF TSI, the requirement of clause 4.2.20.4 must be assessed in the *'Detailed design and execution design, before construction'* phase and in the *'Constructed, before putting into service'* phase.
3. According to ***Clause 4.1.2.18.1 Platform height*** *of the* PRM TSI, *"For platforms on the High Speed Network where no trains complying with the High-Speed Rolling Stock TSI is intended to stop in normal commercial operation and for platforms on the Conventional Rail Network, two nominal values are permissible for platform height: 550 mm or 760 mm above the running surface. The tolerances on these dimensions shall be within -35 mm/+0 mm.....".*

[1] OJ L 77, 19.3.2008, p. 1.
[2] OJ L 64, 7.3.2008, p. 72 (as last amended by Annex III of Commission Decision 2012/464/EU of 23 July 2012, OJ L 217, 14.08.2012, p. 20)

4. According to ***Annex E Assessment of the subsystems*** of the PRM TSI, the requirement of clause 4.1.2.18.1 must be assessed in the *'Design review and/or design examination'* phase and in the *'Assembly (before putting into service)'* phase.
5. Both HS INF TSI and PRM TSI foresee to assess the requirement of 'Platform height' in two phases: during the design and after the platform itself has been built, before putting into service

3 Analysis

1. The requirements set in clauses 4.2.20.4 of HS INF TSI and 4.1.2.18.1 of PRM TSI define two possible nominal heights of platform (550 mm and 760 mm), for the high speed and conventional network.
2. A pair of tolerances, upper and lower, are assigned to these two nominal values, defining then a range within which the actual height of the platform may fall while still being considered acceptable. The upper deviation, that is the difference between the maximum actual value and the nominal value, for both TSIs is set to 0 mm and the lower deviation, that is the difference between the minimum actual value and the nominal value, is set to -30 mm, for the HS INF TSI, and to -35 mm, for the PRM TSI.
3. In engineering design, the value of a dimension is called 'nominal' when this value is the theoretical value to be taken as reference for the design and for the following manufacturing of the component. Then, as it is virtually impossible to obtain precisely the 'nominal' value when manufacturing a component, some tolerances are assigned to the nominal value, defining the limit, for the actual value, of acceptable unintended deviation from the nominal.
4. It is not possible to change the "nominal value" during the construction phases: this is a "single design value" and it is a reference also for the construction: the manufacturers shall put in place their best practices in order to build the components whose actual dimensions are as close as possible to the nominal, but still in the acceptable range defined by the tolerances.
5. When defining tolerances, if the upper deviation is set to 0 mm, it means that the nominal value is meant to be also the maximum acceptable actual value (see case 2) of NB Rail RFU-STR-043 of 05/9/2012).
6. ERA considers, therefore, as correct the interpretation a) in page 1 of QC-INF-011 from NB RAIL: the actual (constructed) value of platform height shall fall, when assessing the requirement before putting into service, within the range defined by the tolerances: for example, for a nominal platform height of 550 mm, the actual value shall be in the range 520 mm – 550 mm (HS INF TSI) or 515 mm – 550 mm (PRM TSI).

7. Intepretation b), as well as solution B, are, on the other hand, not correct: the tolerances written in the TSIs do not apply to the nominal value of the platform height (which is a "single design value"): in that respect, RFU-STR-043 is right when it states that *"Tolerances are not applicable for design values"*.

4 The opinion

1. Following the above analysis, ERA is of the opinion that:
    a. The nominal value of the platform height (when designing) shall be 550 mm or 760 mm.
    b. The actual value of platform height (when assessing, before putting into service) shall be
        i. For the nominal value of 550 mm, in the range 520 mm – 550 mm (HS INF TSI) or 515 mm – 550 mm (PRM TSI).
        ii. For the nominal value of 760 mm, in the range 730 mm – 760 mm (HS INF TSI) or 725 mm – 760 mm (PRM TSI).

Valenciennes, 19 MAI 2014

Marcel VERSLYPE
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