

Making the railway system
work better for society.

OPINION

ERA/OPI/2020-14

OF THE EUROPEAN UNION AGENCY FOR RAILWAYS

for

THE EUROPEAN COMMISSION

regarding

Change of company code to 4-letter-alphanumeric format

Disclaimer:

The present document is a non-legally binding opinion of the European Union Agency for Railways. It does not represent the view of other EU institutions and bodies, and is without prejudice to the decision-making processes foreseen by the applicable EU legislation. Furthermore, a binding interpretation of EU law is the sole competence of the Court of Justice of the European Union.

1. General Context

1.1. Subject

In accordance with section 7.5.2. (9) of the Annex I of Commission Regulation (EU) No 454/2011¹ ('TAP TSI') and in accordance with section 7.2.2. (9) of the Annex of Commission Regulation (EU) No 1305/2014² ('TAF TSI'), the Agency has requested, by letter dated 15 June 2020, the European Commission to request the technical opinion from the Agency regarding the change of the company code from 4-letter numeric to 4-letter-alphanumeric format.

By its letter Ref. Ares (2020)3356535 of 26/06/2020³, the European Commission (DG Move) asked the Agency to provide an opinion concerning the format change of the company codes and the subsequent changes to TAF and TAP [TSIs], requesting as well some complementary elements covered hereby in the Chapter 3.

1.2. Technical scope

The technical scope of this opinion is the unique identification of companies in the telematics TSIs. The usage of those company codes is defined in chapter 4.2.11.1. ('Reference Files') of the Commission Regulation (EU) 1305/2014 and chapter 4.2.19.1. ('Reference files') of the Commission Regulation (EU) 454/2011.

1.3. Technical background

The technical background is mostly related to implementation impacts and it has been treated by the sector analysis and impact assessment from ERA.

1.4. Technical requirements

The technical requirements for the change are laid down in the changed technical documents for the TAF and TAP TSI, annexed to this opinion.

2. Legal Background

According to Article 10(2) of Regulation (EU) 2016/796 of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Railways and repealing Regulation (EC) No 881/2004⁴ (Agency Regulation), the European Commission has the possibility to request the opinion of the Agency on specific matters concerning Interoperability and railway safety.

The specific Change Management Process for the Technical Documents annexed to the TAF and TAP TSI has been amended by Commission Implementing Regulation (EU) 2019/778⁵ and Commission Implementing

¹ Commission Regulation (EU) No 454/2011 of 5 May 2011 on the technical specification for interoperability relating to the subsystem 'telematics applications for passenger services' of the trans-European rail system (OJ L 123, 12.5.2011, p. 11) as last amended by Commission Implementing Regulation (EU) 2019/775 of 16 May 2019 (OJ L 139I, 27.5.2019, p. 103).

² Commission Regulation (EU) No 1305/2014 of 11 December 2014 on the technical specification for interoperability relating to the telematics applications for freight subsystem of the rail system in the European Union and repealing the Regulation (EC) No 62/2006 (OJ L 356, 12.12.2014, p. 438) as last amended by Commission Implementing Regulation (EU) 2019/778 of 16 May 2019 (OJ L 139I, 27.5.2019, p. 356).

³ Copy of the EC letter ref. Ares (2020)3356535 of 26/06/2020, is provided hereby in the ANNEX 1.

⁴ OJ L 138, 26.5.2016, p. 1.

⁵ Commission Implementing Regulation (EU) 2019/778 of 16 May 2019 amending Regulation (EU) No 1305/2014 as regards Change Control Management (OJ L 139I, 27.5.2019, p. 356).

Regulation (EU) 2019/775⁶ respectively. Updated process requires the Agency to “send a request to the European commission to (...) request the technical opinion from the Agency” in cases when “a change request would require a change of the legal text of the TAF/TAP TSI”.

According to the Commission Regulations (EU) No 1305/2014 (TAF TSI) and (EU) 454/2011 (TAP TSI), the agency has to implement change control management process for the technical documents, annexed to both TSI's.

According to the section 7.5.2. (9) of the Annex I of Commission Regulation (EU) No 454/2011 ('TAP TSI') and in accordance with section 7.2.2. (9) of the Annex of Commission Regulation (EU) No 1305/2014 ('TAF TSI') concerning the change control management of the TAF and TAP TSI, the Agency shall send a request to the European commission to request a revision of the TSI and/or request the technical opinion from the Agency, if a change request would require a change of the legal text of the TSI.

The change request CR 449⁷ concerning the Change of company code to 4-letter-alphanumeric format requires establishing a migration plan including a fixed deadline of the implementation of this change. The agency proposes to include the deadline in the chapter 7.1 of the TAP TSI and of the TAF TSI. Such approach is supported by the TAF/TAP TSI Change Control Management Board approving the change request CR 449.

⁶ Commission Implementing Regulation (EU) 2019/775 of 16 May 2019 amending Regulation (EU) No 454/2011 as regards Change Control Management (OJ L 139I, 27.5.2019, p. 103).

⁷ CR 449 submitted in the Change Control Management tool (<https://ccm.era.europa.eu/cqweb/>) by the Agency on April 24, 2018. CR approved by the ERA TAP TSI CCM Board and the ERA TAF TSI CCM Board at the joint meeting on May 27, 2020 (records at https://extranet.era.europa.eu/04/CCM_TAP).

3. Analysis

Section 3.4.2.3. of Annex II of Commission Implementing Decision (EU) 2018/1614⁸ requires the agency to allocate and publish organisation codes. They shall be shared between the organisation register and the TSIs for telematics applications. The code consists of four alphanumeric characters that shall be assigned by the Agency to one organisation. For each of the four alphanumeric characters, any of the 26 letters of ISO 8859-1 alphabet or any number from 0 to 9 may be used. Letters are written in capitals.

The Commission Regulations (EU) 1305/2014 and (EU) 454/2011 (TAF and TAP TSI) are using the 4-digit numerical company code to identify the involved actors in the railway transport, such as infrastructure managers, railway undertakings and service providers.

The code format is specified in the following documents:

- › TAP TSI technical document B.8
- › TAF TSI technical document TAF TSI — ANNEX D.2: APPENDIX F — TAF TSI DATA AND MESSAGE MODEL

The allocation and the management of those codes is defined in the following documents:

- › TAP TSI Application guide B.56 RU/IM-communication
- › TAP TSI Technical Document B.61 (Governance)
- › TAF TSI - ANNEX D.2 : APPENDIX C - REFERENCE FILES

Almost all technical documents, annexed to the TAF and TAP TSIs, are using the company code as data element. Therefore most of the technical documents above have to be changed to incorporate the requirements for the alphanumeric company code. Only few technical documents, such as B.4 and B.5 are already supporting alphanumeric company codes.

The TAF and TAP TSI change control management groups discussed these changes of the technical documents above and accepted them⁷.

During the discussion in the TAF/TAP change control management working parties⁷, it has been recognised, that the plan for migration from the existing numeric codes to alphanumeric codes is needed. The accepted date – confirmed by an impact assessment - for the migration to alphanumeric codes is the 31st December 2025. Until this date all actors should be able to handle the alphanumeric company codes. It has been agreed that “legal obligation for CC migration would have to be strengthened (...) through relevant update of TSI and Master Plan”⁷.

To make the application of the alphanumeric 4-letter company codes mandatory, the following key measures have been identified:

1. The technical documents of both TSI’s have to be modified to allow the usage of alphanumeric company codes
2. A fixed migration date has to be incorporated in the TSI to ensure that the codes can be accepted after this date. There’s a possibility to encompass the various on-going modifications and remaining Change Requests to TAP and TAF in order to come with a comprehensive update for the 2022 TSI package⁹,
3. Companies having business with actors outside the EEA area have to obtain a 4-digit numeric company code even after the 31st December 2025.

⁸ Commission Implementing Decision (EU) 2018/1614 of 25 October 2018 laying down specifications for the vehicle registers referred to in Article 47 of Directive (EU) 2016/797 of the European Parliament and of the Council and amending and repealing Commission Decision 2007/756/EC (OJ 26.10.2018, L 268, p. 53).

⁹ According to the EC letter ref. Ares (2020)3356535 of 26/06/2020⁹ provided hereby in the ANNEX 1.

The detailed analysis, including the impact assessment is available in the accompanying report referred in the ANNEX 2

For existing company codes no change of the code attribution is foreseen. Existing numeric codes assigned to railway undertakings remain unchanged and can be accommodated in the new 4-letter alphanumeric coding.

For companies with business relationships with actors outside the EEA, such as OSJD or OTIF countries, the problem exists that numerical company codes are in use. These organisations have not established a migration plan towards 4-letter alphanumeric codes. This leads to the problem that once 4-letter alphanumeric codes are allocated to companies within EU, these companies would not be able anymore to communicate with their partners in OTIF or OSJD countries. This has an impact on the data exchange. Therefore actors within EU, declaring to have business relationships with those countries, have to receive a numerical company code, which can be used without restrictions within EEA and beyond.

ERA continues to communicate with OSJD and OTIF to discuss the company code management.

4. The opinion

Migration to the 4 alphanumeric characters company code is possible for the telematics applications for freight and for passengers. This migration has to be supported by a migration plan, making the migration legally binding from 1st January 2026.

The Commission Regulations (EU) 1305/2014 and (EU) 454/2011 should be updated to amend their provisions for the implementation of the 4-letter alphanumeric company codes, in order to support the implementation measures related to the Change of company code to 4-letter-alphanumeric format, in line with the migration strategy, as proposed by Change Request, while allowing data exchange with actors outside EEA. The following amendments are proposed:

- *Change of the Annex I of Commission Regulation (EU) No 454/2011 (TAP TSI)*

7.3. Specific cases

7.3.1. Introduction

The following special provisions are permitted in the specific cases below:

- (a) "P" cases: permanent cases;*
- (b) "T" cases: temporary cases, where it is planned that the target system is reached in the future.*
- (c) 'T1' cases: 'temporary' cases, where the target system shall be reached by 31 December 2025.*

7.3.2. List of specific cases

7.3.2.1 Specific case Company code ("P")

For actors exchanging data with actors located outside EEA, company codes with 4 digits shall be allocated

7.3.2.2 Specific case Company code ('T1')

The usage of numerical codes according to the reference file of the coding for all infrastructure managers, railway undertakings, station managers, service provider companies (chapter 4.19.1), so called company codes, is mandatory.

- *Change of the Annex of Commission Regulation (EU) No 1305/2014 (TAF TSI)*

7.3. Specific cases

7.3.1. Introduction

The following special provisions are permitted in the specific cases below:

(a) "P" cases: permanent cases;

(b) "T" cases: temporary cases, where it is planned that the target system is reached in the future.

(c) 'T1' cases: 'temporary' cases, where the target system shall be reached by 31 December 2025.

7.3.2. List of specific cases

7.3.2.1 Specific case Company code ("P")

For actors exchanging data with actors located outside EEA, company codes with 4 digits shall be allocated


7.3.2.2 Specific case Company code ('T1')

The usage of numerical codes according to the reference file of the coding for all IM, RUs, Service provider companies (chapter 4.2.11.1), so called company codes, is mandatory.

Valenciennes, 07/09/2020



Josef DOPPELBAUER
Executive Director

ANNEX 1. EC letter ref. Ares (2020)3356535 Ref. Ares(2020)3356535 - 26/06/2020

EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT
Directorate C - Land
The Director

Brussels
MOVE.DDG2.C.4/CDG

By e-mail: Josef.Doppelbauer@era.europa.eu

Subject: The Agency's opinion regarding change of company code to 4-letter-alphanumeric format

Dear Josef,

I acknowledge your letter (ERA ref.: JD-FS-D(2020)3675) calling for a request of an Agency opinion on the change of company code from 4 numeric digits to 4-alphanumeric format.

This request is justified by the need to accommodate a larger number of entities. The change of code entails changes in TSIs and has a potential impact on the existing enterprises and of interoperability with extra-EU systems.

Accordingly, I confirm the Commission request to provide us with ERA's technical opinion concerning the format change of the company codes and the subsequent changes to TAF and TAP, and I request to include in such opinion the following complementary elements:

- an impact assessment of the changes due, including on IT systems, costs, benefits and governance;
- the timeframe for the introduction of the new format;
- specify the treatment of existing company codes and the evolution on the framework for issuing such codes, with ERA widened role, as well as the fine-tuning opportunities / needs for companies operating beyond the EEA;
- consider the possibility to encompass the various on-going modifications and remaining Change Requests to TAP and TAF in order to come with a comprehensive update for the 2022 TSI package.

Yours sincerely,

Elisabeth WERNER

ANNEX 2. List of appendices

Appendix 1. ACCOMPANYING REPORT TO THE OPINION OF THE EUROPEAN UNION AGENCY FOR RAILWAYS for THE EUROPEAN COMMISSION regarding Change of company code to 4-letter-alphanumeric format