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## Report

### *Consultation on the revision of the TSI relating to accessibility for persons with disabilities and persons with reduced mobility*

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#### *Document History*

<i>Version</i>	<i>Date</i>	<i>Comments</i>
0.1	13/11/2019	First draft for discussion at the Working Party
1.0	5/03/2020	Final draft

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## 1. Introduction

With the Delegated Decision on TSIs<sup>1</sup>, the European Commission requested the Agency to set up working parties for revising all TSIs. In particular, the TSI relating to ‘Accessibility for persons with disabilities and persons with reduced mobility’<sup>2</sup> (PRM TSI) has been reviewed to take into account the objectives set out in Article 3 and in Article 10 of the Delegated Decision on TSIs.

This proposal for the revision of the PRM TSI was drafted by an Agency working party. According to the articles 6 and 7 of its regulatory provisions<sup>3</sup>, the Agency invited associations and bodies representing users as well as social partners to comment the draft proposal.

The consultation took place from 19 July 2019 to 19 October 2019 on the ERA website. 24 organisations participated to the consultation; they are listed in the table below:

Organisation name	Type of organisation	Country (EU if active at EU level)
EDF – European Disability forum	Representative of users	EU
European Blind Union	Representative of users	EU
Disabled Peoples Organisations	Representative of users	Denmark
CERMI	Representative of users	Spain
Inclusion Handicap	Representative of users	Switzerland
European Guide Dog Federation	Representative of users	EU
City Able PT	Representative of users	Portugal
Swedish Public Transport Association	Transport authority	Sweden
Stockholm Region	Transport authority	Sweden
EIM	Representative Body	EU
EPTTOLA	Representative Body	EU
Trafikverket	Infrastructure Manager	Sweden
CP	Railway Undertaking	Portugal
Faiveley	Manufacturer of rolling stock subsystems	France
JERNHUSEN	Station Manager	Sweden
Swiss Competence Centre for Accessibility in Architecture	Representative of users	Switzerland
NSA AT	NSA	Austria
NSA DE	NSA	Germany

<sup>1</sup> Commission Delegated Decision (EU) 2017/1474 of 8 June 2017 supplementing Directive (EU) 2016/797 of the European Parliament and of the Council with regard to specific objectives for the drafting, adoption and review of technical specifications for interoperability - OJ L 210, 15.8.2017

<sup>2</sup> Commission Regulation (EU) No 1300/2014 of 18 November 2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility - OJ L 356, 12.12.2014

<sup>3</sup> 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 881/2004 OJ L 138, 26.5.2016

NSA IE	NSA	Ireland
NSA NO	NSA	Norway
NSA PL	NSA	Poland
NSA RO	NSA	Romania
NSA SE	NSA	Sweden
NSA SL	NSA	Slovenia

The change requests from the 24 contributors were not all provided according to the template provided. When this was the case, the requests were formatted according to the template. All requests and their answers have been consolidated in a unique table.

## 2. Table of the change requests received and ERA answers

<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>
4.2.6	P	European Blind Union	<p>Comments : It seems relevant to us that there is only one telephone number or website per country to reserve the assistance service, regardless of the number of transport companies</p> <p>Proposal : Regardless of the number of transport companies, there must be only one service booking telephone number and one website.</p>	Noted without change	<p>This remark is not in the scope of the PRM TSI, but of the TSI on Telematics Applications.</p> <p>It is therefore transmitted to the team in charge of that TSI</p>
4.2.6	P	European Blind Union	Regardless of the number of transport companies, the waiting area for assistance services must be unique and central in each station.	Noted without change	The PRM TSI deals with operations only when they are linked to technical aspects. In this case, it would depend on the agreement between the different companies operating in a station, which is not in the scope of the PRM TS

<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>
4.2.1.10 (4)		NSA NO	<p>The information concerning the departure of trains (including destination, intermediate stops, platform number and time) shall be available at a height of 160 cm <del>maximum</del> at least in one location in the station. <del>This requirement applies to printed and dynamic information whatever is provided.</del></p> <p>The requirement is now more difficult to deal with. For instance, should the information be at a height of 160 cm now? And is it the top of the information?</p> <p>It is the NSA NO view that the word “maximum” should stay in the requirement, so it is easier to verify.</p>	Rejected	As it was expressed (maximum height of 160cm), the requirement could be (and had been) wrongly understood; the requirement has therefore been modified and clarified in the application guide.
4.4.2		NSA NO	<p>— Providing services on-board trains</p> <p>When a service is provided to passengers in a specific area of a train that can't be accessed by wheelchair users, operational means shall be in place to ensure that:</p> <ul style="list-style-type: none"> <li>• free of charge assistance is available to assist wheelchair users reach the service or</li> <li>• the service is delivered free of charge to wheelchair users at the wheelchair spaces unless the nature of the service makes it impossible to provide it remotely.</li> </ul> <p>This might be an issue in Norway when it comes to the serving of alcohol. It is not the NSA that gives the approval for this, and the approval of serving alcohol may be restricted to the cafeteria car.</p>	Noted without change	This aspect will be covered by the revised Rail Passengers Rights Regulation (currently draft)

Table E.1	P	NSA SE	<p>Swedish Transport Agency (NSA SE) would like to thank ERA for the opportunity to comment on the draft document. NSA SE considers it an interesting proposal to increase accessibility for persons with disabilities and persons with reduced mobility in the railway system.</p> <p>However, the draft contains a misguided proposal. Table E.1 (appendix E in the draft) reintroduces the on-site inspections by the NoBo for all requirements in TSI PRM.</p> <p>NSA SE has, in the working group for the revision of TSI PRM, argued that it would be a mistake to reintroduce the on-site inspections for the NoBo for all requirements in TSI PRM.</p> <p>The reason mentioned to reintroduce on-site inspection for the NoBo is, that the NoBo, in some cases, has noticed that the construction phase deviates from the design phase. In those cases, some of the relevant requirements in TSI PRM may not be fulfilled.</p> <p>Of course, it is not acceptable that some relevant requirements are not fulfilled, but the suggested solution (to reintroduce on-site inspections by NoBo for all requirements) to solve the problem is not, as NSA SE sees this, an optimal solution since the problems are located much earlier in the process. It is also very important to understand that the suggested solution leads to a more costly and time consuming process for all TSI PRM projects over the union, even for the majority of the projects that works very well.</p> <p>A very interesting point is that the demand for reintroducing the on-site inspection by NoBo is</p>	Rejected	<p>This topic was discussed at the Working Party. The return of experience shows that implementing correctly the requirements of the TSI is not evident and a 3<sup>rd</sup> party inspection may avoid mistakes that may lead to non-compliant stations being placed in service</p>
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		<p>raised by NB-Rail. Not by any NSA or other representative bodies.</p> <p>However, no one knows how big this problem (deviations from design phase and construction phase) is in real terms. No statistics has been presented by NB-Rail to show that this is a general problem.</p> <p>NSA SE means that more studies are needed, e.g:</p> <ul style="list-style-type: none"> <li>• How big is the problems in real terms, in how many projects are there deviations between design phase and construction phase in relation to all projects in the union? (Deviations that leads to requirements in TSI PRM not being fulfilled).</li> <li>• Are the problems spread all over the union?</li> <li>• Are there any patterns for detected deviations between design phase and construction phase? Type of projects, size of projects e.g.</li> <li>• Are there deviations depending on which module has been used? EC verification based on unit verification (SG) or EC verification based on full quality management system plus design examination (SH1).</li> </ul> <p>Nowadays, European countries are organized differently regarding the management of their railway system. Some countries have, in line with different directives/railway packages, a more open and deregulated railway market than other countries.</p> <p>In Sweden (as in other countries) there can be several actors (station managers) at one station. One actor can manage the platforms, another can manage the parking places and a third can manage the toilets – at the same station.</p>		
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<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>
			Different actors at the same station have therefore different kinds of financing (private, municipality or state founded). Therefore, a more costly process to fulfil TSI PRM can lead to a situation where the TSI PRM itself will be an obstacle. In simple terms – the proposal entails a counter-productive effect which we should avoid, to the benefit of a competitive European railway.		
6.2.1, 6.2.2, E1	G	Swedish Public Transport Association	Further site inspections by notified body will subsequently lead to an increase in costs as well as time. If inspections are to be conducted in the final stages of construction, they will serve little or no purpose for elimination faults as they are already in place and usually hard to correct on-site. Problems faced today largely coincides with earlier phases. If focus is to ensure fulfilment of the TSI, process improvements in earlier stages would be more useful. The work methods vary largely between notified bodies today and it might be useful with a slightly more standardised process.	See point from NSA SE	
Appendix E, Table E.1	P	EIM	Don't agree with proposed extended assessment of Notified Body, assessment added in construction phase.  Propose to delete assessment in construction phase.	See point from NSA SE	
Appendix E, Table E.1	P	Trafikverket	Don't agree with proposed extended assessment of Notified Body, assessment added in construction phase.  Propose to delete assessment in construction phase.	See point from NSA SE	

<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>
6.2.1. /6.2.2/ table E1	G	Stockholm Region	<p>The proposal as per clauses 6.2.1 and 6.2.1, table E1, will cause delay and increase cost for both construction and reconstruction of stations and platforms.</p> <p>The TA of Region Stockholm believes that it is better to implement a solution build on a voluntary dialogue between concerned parties. There should be a possibility for constructors to get an exemption from the requirements in 6.2.1 and 6.2.2. The exemption should be granted if the constructor is able to demonstrate competence and experience based on previous delivered and proven result.</p>	See point from NSA SE	
6.2.1. /6.2.2/ table E1	G	JERN- HUSEN	<p>What is proposed in 6.2.1 and 6.2.2, table E1, will have as a consequence increased costs and an unwillingness to make modification and modernisations. This due to much more work in administration and more costs.</p> <p>Jernhusen has a firm belief that it is better to implement a solution build on a voluntary dialogue between concerned parties. There must be a possibility for constructors to get an exemption from the requirements in 6.2.1 and 6.2.2. The exemption should be granted if the constructor is able to demonstrate competence and experience based on previous delivered and proven result.</p>	See point from NSA SE	

<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>
2.2	G	ŽSR	<p>The definition of “person with disabilities and person with reduced mobility” is too general. The TSI does not enhance the accessibility according to point 1 to all persons covered by the definition. It enhances the accessibility only for persons with particular problems by definition of technical specifications relevant to some disabilities.</p> <p>The text of point 1 and the definition in point 2.2 should reflect the limited enhancing of accessibility based on the TSI.</p>	Rejected	The definition was discussed during the previous TSI revision and it is aligned with the definition in the passenger rights regulation (Reg. (EC) 1371/2007). A revision of this definition is not considered necessary at this stage.
2.3	G	ŽSR	<p>In the definition of “interoperable wheelchair transportable by train” we propose delete the first sentence “An interoperable wheelchair transportable by train is a wheelchair the characteristics of which permit the full usage of all features of a rolling stock designed for wheelchair users.” and include new second sentence “The rolling stock shall be designed to allow use of all features intended to be used by wheelchair user with interoperable wheelchair user.”</p> <p>In our opinion the rolling stock shall be designed for the use by interoperable wheelchair user.</p>	Noted without change	We agree with the remark, but we believe a change is not necessary. The definition in point 2.3 is not a requirement but only a definition of an ‘interoperable wheelchair’. The requirements are in chapter 4.2.2

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4.2.1.1., (1)	U	ŽSR	<p>In our understanding there is in practice only parking space adapted to wheelchair user and no parking spaces with specific features for specific disabilities.</p> <p>In our opinion this should be reflected in the wording.</p>	Noted without change	We agree with the remark. In practice, the regulation on parking places for PRM is national, that is the reason why the TSI expresses only a high level requirement.
4.2.1.2.2., (-2a)	P, U	ŽSR	<p>We propose delete the second sentence “This requirement shall apply from a single step.”</p> <p>The sentence has no added value to the first one.</p>	Rejected	<p>The point has been added further to a question on the previous version of the TSI. See the Technical Opinion on that point: <a href="https://www.era.europa.eu/sites/default/files/library/docs/opinion-advice/opinion_era-opi-2015-7_en.pdf">https://www.era.europa.eu/sites/default/files/library/docs/opinion-advice/opinion_era-opi-2015-7_en.pdf</a></p> <p>In summary, all the requirements for steps do not have the same scope of application:</p> <ul style="list-style-type: none"> <li>• handrails and tactile walking surface indicators may be installed only where there are 3 steps or more</li> <li>• contrasting band is necessary even where there is only one step</li> </ul>

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7.1.1	G	ŽSR	<p>We propose to revise the text “Where stations which were closed for a long time to passenger service are put in service again, this may be treated as renewal or upgrade according to point 7.2”. The closed station can be kept in good state without need for renewal or upgrade. It can be opened as existing infrastructure with existing parameters. Later it can be treated as renewal, upgrade eventually within gradual transition to the target system.</p> <p>Please revise the text taking into account the comment to avoid any future discussion about legal obligation of renewal or upgrade in case of reopening the closed stations for passenger services.</p>	Noted without change	The meaning of the text is the same as your proposal. “ <i>This may be treated as renewal or upgrade according to point 7.2</i> ” means that it is not necessary to perform any work before re-opening the station.
Appendix O	G	ŽSR	<p>We propose include into the table information about place where those documents are available for TSI users or attach those documents directly into TSI as annex.</p> <p>Please take into account our proposal in the comment</p>	Noted without change	The documents are not available at the moment; they are being developed. After that, they will be available with the technical documents of the TAP TSI.

<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>
TSI PRM	G	ŽSR	In order to avoid differences between Commission Regulation (EU) No 1300/2014 and needs in terms of developing compensatory aids used by persons with reduced mobility, we recommend to align the Regulation with international universal standards of accessibility for buildings, products and services used by persons with disabilities (USTAD (Universal standards for persons with disabilities) - WDU Accreditation System).	Rejected	We don't know this standard and neither the WDU. When a recognized EN standard becomes available, the TSI PRM would be aligned to the standard.
		Disabled Peoples Organisations Denmark	Any railway operator must provide a free space to accommodate a guide or assistance dog in activity, holding a professional service dog card alongside his blind or partially sighted master, whatever be the class of the car. This place must remain available until the closing of the reservation of each car.	Rejected	The requirement expressed in the TSI is that a person travelling with a guide or assistance dog will not be charged extra for the dog. It is then a task of each railway operator to organize how they allocate space for the dog.

<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>
Art. 7.2.1.1	G	NSA DE	It is not possible to judge this aspect of the proposed revision of the PRM TSI. In the past the data to be collected for the inventory of assets were laid down in Appendix O. Since this appendix is not part of the PRM TSI anymore, there is a reference to the NeTex standard. The specifications of this standard which do not fit to the needs of the inventory of assets have to be excluded by the design of the data collection tool (entry form with appropriate attributes). As the data collection tool is not ready and has not been presented to the working party, it is not clear if this is the case. We would have preferred if the attributes had been explicitly and mandatorily stated in the TSI as appendix.	Noted without change	This aspect (Inventory of assets) is not covered by the current revision proposal.
	G	EDF CERMI	EDF bases its work on the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD) that the EU, as well as all Member States, has ratified in 2010. Article 9 of this Convention requires all EU legislation to provide the necessary accessibility provisions to allow persons with disabilities to participate in society “on an equal basis with others”.	Noted without change	

<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>
	G	EDF  CERMI	Within the limits of those restrictions, EDF suggested changes and made recommendations to still try and make rail travel more accessible to persons with disabilities, e.g. by improving the contrast requirements for printed and on-screen information or by raising the length limit for wheelchairs on boarding aids. While EDF expects a more thorough revision in the coming years that will hopefully tackle more fundamental issues such as the different platform heights throughout the EU and the lack of adequate boarding aids, for now we give our comments on draft text of the TSI-PRM revision for October 2019.	Noted without change	
Appendix M	P	EDF  CERMI	Interoperable wheelchair transportable by train An interoperable wheelchair transportable by train is a wheelchair the characteristics of which permit the full usage of all features of a rolling stock designed for wheelchair users. The characteristics of an interoperable wheelchair transportable by train are within the limits specified in appendix M. EDF recommendation: The train should be adapted to various types of wheelchairs and not the other way around. That is why we have the TSI-PRM.	Noted without change	According to the Directive on Interoperability (2016/797), the TSIs shall define an optimal level of technical harmonisation to achieve interoperability within the Union rail system. We also remind the fact that TSIs define the regulatory requirements that need to be fulfilled in all Europe. Railway operators who have the possibility to ask for more can do so on a contractual basis.

<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>
Annex 4.5.2. Rolling Stock Subsystem	P	EDF  CERMI	<p>Rolling Stock subsystem Providing services on-board trains When a service is provided to passengers in a specific area of a train that cannot be accessed by wheelchair users or other PRMs, operational means shall be in place to ensure that:</p> <ul style="list-style-type: none"> <li>• free of charge assistance is available to assist wheelchair users reach the service or</li> <li>• the service is delivered free of charge to wheelchair users at the wheelchair spaces unless the nature of the service makes it impossible to provide it remotely.</li> </ul> <p>(This case is based on a complaint to the Ombudsman in Finland. EDF thinks that the solution proposed in the TSI is not sufficient. It does not cover all disabilities but only wheelchair users. Also, the solution in the TSI should aim at making all areas of the train accessible instead of opting for the “service at the wheelchair space” solution. This is not ambitious enough).</p> <p>EDF recommendation: this service should not only be limited to wheelchair users, it can also be provided to persons with other types of disabilities with similar difficulties; e.g. somebody who is using a walking frame. It should be clarified that this service cannot be charged for in addition to the regular ticket price and standard services.</p>	Rejected	<p>The proposed solution can't be extended to other persons with mobility impairment without raising many operational issues such as:</p> <ul style="list-style-type: none"> <li>-who would have the right to benefit from the service?</li> <li>-how would those persons be identified by the service provider?</li> <li>-how would those persons order the service?</li> <li>-how to organise the delivery?</li> <li>-etc.</li> </ul>

<p>Annex                  Assessment                  of                  conformity                  and/or                  suitability for                  use</p>	<p>P</p>	<p>EDF                   CERMI</p>	<p>The Working Party debated in depth about the role of Notified Bodies (NoBos) for the assessment of stations. During the revision of the PRM TSI conducted in 2011-2014, the number of parameters that NoBos have to check on-site was considerably reduced. As expressed in the report made during that revision: “most of the parameters related to stations in the PRM TSI can be easily assessed with a simple ruler: door width, marking of transparent obstacles, presence of information,... for all those parameters, it is expected that the realization on site will comply to the approved design and therefore the revised TSI does not require the on-site inspection by a Notified Body”.</p> <p>The return of experience shows that the assessment of these parameters is not as easy as it seems and that to ensure a proper accessibility requires expertise. Works in stations being generally performed by subcontractors of the Station Manager, the solutions designed with expertise are often not implemented with the same level of expertise, resulting in mistakes/omissions caused by a misperception of the importance of some parameters. NB-Rail provided several examples of stations showing severe non-conformities to the PRM TSI while the design was compliant. European Association of Infrastructure Managers (EIM) expressed concerns about the role given to NoBos by the Interoperability Directive. EIM would like to work together with the NoBos during the course of projects and not only at the end. Therefore, EIM is opposed to the site inspections. However, it is clear that NoBos must not act as consultants and therefore, to ensure the correct</p>	<p>Accepted</p>	<p>This is also the Agency proposal</p>
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<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>
			application of the PRM TSI, we strongly believe that reintroducing on-site visits are crucial.  EDF recommendation: reintroduce the on-site visits to ensure more effective monitoring of compliance with the Regulation.		

Appendix M	P	EDF  CERMI	<p><b>M.1 SCOPE</b> This appendix identifies the maximum engineering limits for an interoperable wheelchair transportable by train. These limits are used for designing and assessing the rolling stock (architecture, structure, layout) and its components (access doors, internal doors, seats, toilets etc.). When the characteristics of a wheelchair exceed these limits, the conditions of use of the rolling stock might be degraded for the user (for instance no access to the wheelchair areas). Exceeding some limits may prevent the user to access the rolling stock. Those limits are defined by each railway undertaking as specified in the point 4.2.6.1 of the TAP TSI.</p> <p><b>M.2 CHARACTERISTICS</b> The minimum technical requirements are: Basic Dimensions</p> <ul style="list-style-type: none"> <li>• <i>Width of 700 mm plus 50 mm min each side for hands when moving.</i></li> <li>• <i>Length of 1200mm plus 50 mm for feet</i></li> </ul> <p>Weight</p> <ul style="list-style-type: none"> <li>• <i>Fully laden weight of 300 kg for wheelchair and occupant (including any baggage) in the case of an electrical wheelchair for which no assistance is required for crossing a boarding aid.</i></li> <li>• <i>Fully laden weight of 200 kg for wheelchair and occupant (including any baggage) in the case of a manual wheelchair.</i></li> </ul>	Rejected	<p>The TSI specifies the optimal level of technical harmonisation. In Europe, the rolling stock is designed according to the available gauge, resulting in a vehicle width of around 2700/2800mm. Within such a width, it is already challenging to have a Universal Toilet (of 1500mm internal width), a corridor along this toilet (800mm clear) and the necessary side walls, air ducts, handrails, etc. For that reason, it is not considered to change the dimensions of the ‘interoperable wheelchair transportable by train’ in the TSI.</p> <p>We remind that railway operators can, on a contractual basis with their supplier, specify more ambitious requirements and indicate on their website the limits they accept.</p>
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<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>
			<p>EDF recommendations: The length of the basic dimensions should be increased from 1200 mm to 1400 mm, preferably even 1500 mm to include mobility scooters, etc. In Denmark DSB has stated the limit of the length of a wheelchair/mobility scooter to be max. 1400 mm, as is the general length of the lifts in buildings and stations, and the length of the Danish boarding lifts used for boarding the trains. Links:  <a href="https://www.dsb.dk/globalassets/produkter_og_services/pdf/handicapservice_august2017.pdf">https://www.dsb.dk/globalassets/produkter_og_services/pdf/handicapservice_august2017.pdf</a>  <a href="https://www.dsb.dk/find-produkter-og-services/handicapservice-i-dsb/">https://www.dsb.dk/find-produkter-og-services/handicapservice-i-dsb/</a>  <i>EDF recommendation: The lifting capacity always to be minimum 300kg regardless of type of wheelchair.</i></p>		

	G	EDF  CERMI	<p>In addition to the recommendations given for the current revision, EDF hopes that substantial gaps will be addressed during a foreseen comprehensive revision of the TSI PRM. As regularly flagged during discussions within the TSI PRM ERA Working Group, we note that the following aspects of the Regulation need further attention:</p> <ul style="list-style-type: none"> <li>• <i>Need for common platform heights and level access between stations and rolling stock.</i></li> <li>• <i>Need for more than one wheelchair space per carriage. Persons with disabilities should be able to travel in groups like everyone else.</i></li> <li>• <i>Freedom and possibility of choice between 1st and 2nd class for wheelchair users.</i></li> <li>• <i>Accessible emergency breaks for wheelchair users.</i></li> <li>• <i>Rotation radius inside toilet: The existing measurements only consider manual wheelchair access, and current 'universal toilet' standard does not provide sufficient space for all wheelchair users.</i></li> <li>• <i>Need for foot rest for persons of short stature.</i></li> <li>• <i>Need for sufficient space for guide dogs both in 1st and 2nd class in all new rolling stock. The places need to be available from reservation until last minute for a guide dog user.</i></li> </ul>	Noted Without Change	These points will be reported for future revisions
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<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>
			<ul style="list-style-type: none"> <li>• <i>Right of guide dog users to a second free of charge seat for the guide dog on all existing rolling stock.</i></li> <li>• <i>Mandatory door opening and closing signals for all renewed and upgraded rolling stock.</i></li> <li>• <i>Need for design for all approach to accessibility to benefit wider diversity of passengers (e.g. persons with disabilities, persons with (temporary) reduced mobility, older persons, etc.).</i></li> </ul> <p>EDF will publish a final detailed position ahead of the next TSI PRM revision, which is likely to incorporate further issues in addition to the above mentioned.</p>		

4.2.2.11.2 & 4.2.2.12.1 & 5.3.2.8 & 6.2.3.2	P	Faiveley	<p>Clause 4.2.2.11.2 (4) states that the “As a minimum the first and the last steps shall be indicated by a contrasting band with a depth of 45 mm to 55 mm extending a minimum of 80 % of the width of the steps on the top surface of the step nosing. A similar band shall indicate the front surface of the last step when entering the unit.”</p> <p>Nevertheless clause 4.2.2.11.2 (6) states that “If a step board is fitted and it is an extension of a door sill outside the vehicle, and there is no change in level between the step board and the floor of the vehicle, this shall not be considered to be a step for the purposes of this specification. A minimal drop in level, with a maximum of 60 mm, between the floor surface at door sill and that of the exterior of the vehicle, used to guide and seal the door is also permissible and shall not be considered as a step.”</p> <p>That means that sub-clause (4) related to contrasting band does not apply and that contrasting band are not required.</p> <p>Clause 4.2.2.12.1 - Movable step and bridging plate – does not require contrasting band and refers to clause 5.3.2.8 for additional requirements. Clause 5.3.2.8 - Boarding aids: movable steps and bridging plates – does not require contrasting band on movable steps and bridging plates The conclusion of these clauses is that contrasting bands are not mandatory in case the vestibule and the door sill are at the same level and that</p>	Accepted	We propose to add a reference to EN16584-1 point 5.3.9 in the application guide
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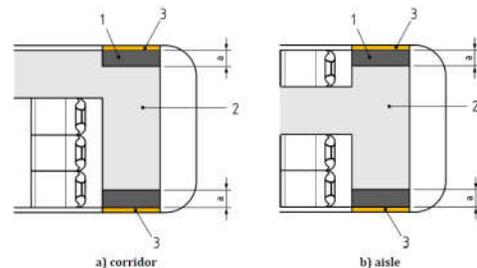
contrasting band are not mandatory for movable steps and bridging plates.

Clause 6.2.3.2 – Step position for vehicle access and egress – which states that the “outer end of the floor at the passenger access shall be considered as a step” does not solve the problem because this requirement is clearly only valid to calculate the gap between the vehicle and the platform.

To clarify the requirements, our proposal is:  
 Clause 4.2.2.11.2 – add in sub-clause (4)  
 “The outer end of the floor at the passenger access shall be considered as a step for the purpose of this clause.

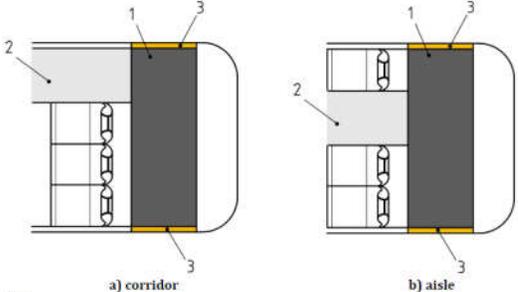
Movable steps and bridging plates shall be considered as a step for the purpose of this clause”

Note : see figures 7 and 8 of EN16584-1 below for a better understanding of the comment



- Key
- 1 contrasting floor area
  - 2 rest of the flooring of the vehicle
  - 3 contrasting band
  - a 200 mm minimum

Figure 7 — Examples of minimum doorway position markings (without entrance steps)

Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
			 <p>Key</p> <ul style="list-style-type: none"> <li>1 contrasting floor area (200 mm deep minimum)</li> <li>2 rest of the flooring of the vehicle</li> <li>3 contrasting band</li> </ul> <p>Figure 8 — Examples of alternative doorway position markings</p>		
Annex G2	P	Faiveley	<p>In order to have the same finding signal everywhere in Europe, we propose to select only one of the 2 proposed finding signals.                      The preferred signal is the dual tone one.</p>	Rejected	<p>We propose to keep both signals in the TSI but state clearly that both shall be equally accepted in all Member States.</p>
Annex M	P	Faiveley	<p>The definition of the wheelchair is not homogenous to the slope requirements in the other parts of the TSI:                      Slope limitation in percentile in clause 5.3.2.9 and dynamic stability limited to 6° in appendix M and static stability limited to 9° in appendix M.                      Use always degrees or                      Use always percentile</p>	Accepted	<p>We will specify both in the TSI</p>

<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>
Annex M	U	Faiveley	Both dynamic (6°) and static (9°) stability are lower than the maximum slope required in clause 5.3.2.9 (18% - 10,2°). That probably means that external help is required for maximum slopes, but it is not written. Nor the TSI nor the EN16584, 16585 and 16586 clarify this point. We suggest that these points will be clarify in the TSI or in the EN standards in later versions.	Accepted	We will explain in the guide that when used with such a high angle slope, crossing the ramp should be made with assistance and that it is preferable to use the boarding aid with smaller ramps. The value of 10.2° represents a maximum theoretical value.
	G	Faiveley	Our understanding is that the requirements for the accessibility to the train are divided in 2: - Level access for PRM with maximum horizontal gap of 75mm and maximum vertical gap of 50 mm - Other access allowing 230-mm vertical gaps and 200 – 290-mm horizontal gaps for other passengers If we assume that the first type of requirement should allow an independent access for people with electric wheelchair, another category of requirements could concern accessibility to allow an easy and independent access to the train for people using manual wheelchairs without external help: for example a requirement of maximum 18% ramp in clause 5.3.2.9 does not seem allowing such accessibility...	Noted without change	It may be relevant to define what would be an “independent access”, i.e. an access that doesn’t correspond to the definition of level access as it is given in the TSI but that would still permit access to wheelchair users without assistance.  This might be a topic for a future revision.

WP mandate	G	EPTTOLA	<p>EPTTOLA does not support any technical change to Chapter 4 of the TSI, outside of the original remit of the WP, which is understood to be development of Chapter 7 of the PRM TSI, based on the tool for the Inventory of Assets and, based on availability, on the common priorities and criteria regarding national implementation plans. This is to satisfy the following against 2 legal basis:</p> <ul style="list-style-type: none"> <li>› Article 7(2) and (3) of PRM TSI: ‘The Agency shall set up and run a working party in charge of making a proposal for a recommendation as regards the minimum structure and content of data to be collected for the inventories of assets. [...]’ ‘On the basis of the recommendation referred to in paragraph 2, chapter 7 of the Annex shall be updated in accordance with Article 6 of Directive 2008/57/EC.’</li> <li>› Article 8(7) of PRM TSI: ‘Within six months of completion of the notification process, the Commission shall draw up a comparative overview of the strategies contained in the national implementation plans. On the basis of this overview, and in cooperation with the advisory body referred to in Article 9, it shall identify common priorities and criteria to further the implementation of the TSI. These priorities shall be integrated in chapter 7 of the Annex during the revision process pursuant to Article 6 of Directive 2008/57/EC.’</li> </ul> <p>It is further understood that the Agency stated that apart from the changes to be brought to PRM TSI by the Inventory of Assets and the common priorities and criteria, the modifications should also include the correction of mistakes and inconsistencies and</p>	Noted Without Change	<p>The TSI was also revised in line with the Commission Decision 2017/1474 <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D1474">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32017D1474</a> listing objectives for all TSIs</p> <p>It is also common practice to take the return of experience in consideration and revise the TSI accordingly.</p>
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<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>
			update references to standards. In the course of the project, CEN WG 44 standards should be published. The above does not include making any changes to Chapter 4 other than correction of errors and update of standards. However, see following comment.....		

<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>
4.2.2.3.2. (8), bullet point 5.	P	EPTTOLA	<p>The door operating signals. Bullet point 5. The requirement states: 'The audible and visible door closing signal can be omitted when a door is closing for reasons other than departure if alternative means are in place to mitigate the risk of injury to the passengers and the train crew'. It is understood that this proposed change to the TSI came as a result of one Member State having an issue related to trains waiting at stations in rural locations and complaints from residents within the vicinity of the station. The following comments are made on this basis:</p> <ol style="list-style-type: none"> <li>1. <i>Allowing an option such as this in a TSI is in effect allowing a member state to have its own national rule.</i></li> <li>2. <i>It is understood that options in TSIs are dealt with by county specific / special cases and not in the main body of the TSI. If the member state in question require such an amendment, then they should apply for a specific / special case?</i></li> <li>3. <i>Assuming it was left in as set out in the draft text, who decides which of the options is required at the design stage, operator or owner?</i></li> </ol>	Rejected	We understand the point and will state in the TSI that both systems shall be equally accepted in all MSs

<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>
2.3. Level access	M	RK Inclusion Handicap	<p>In everyday life, the vehicles are planned in such a way that the gap reaches the permitted maximum. Due to circumstances such as curves, construction tolerances on the platform and on the vehicle, we see gaps that are far above the permitted maximum. For this reason, vehicles must be planned and built in such a way that a gap of 0 mm horizontally and 0 mm vertically is aimed for, so that the effective limit values are adhered to in reality.</p> <p>Revise the text with the following amendments:</p> <ul style="list-style-type: none"> <li>• The gap between the door sill of that doorway (or of the extended bridging plate of that doorway) and the platform is planned to approximate the target values 0 mm measured horizontally and 0 mm measured vertically as good as possible. The gap at an in-use platform does not exceed 75 mm measured horizontally and 50 mm measured vertically and</li> <li>• The rolling stock has neither an internal step nor a threshold between the door sill and the vestibule.</li> </ul>	Rejected	The TSI expresses requirements that are mandatory; it can't define targets. For a vehicle to be authorized to be placed in service, it needs to demonstrate that it complies with <b>all</b> that is written in the TSI.

4.2.2.2	P	RK Inclusion Handicap	<p>We often observe that, compared to Switzerland, the number of wheelchair places on European train routes is limited, insufficient and does not correspond to a non-discriminating proportion of the total offer of seats in the unit. In Switzerland, the experience shows that with so-called multifunctional zones next to an entrance this gap can be closed without requiring the reservation of too many large wheelchair spaces. Multifunctional zones follow the principle of design for all and meet the requirements of an inclusive society to the highest degree.</p> <p>Proposal:</p> <p>(1) According to the length of the unit, excluding the locomotive or power head, and in relation to the total amount of seats, there shall be in that unit not less than the number of accessible wheelchair spaces shown in the following table:</p> <p>Insert the revised table as proposed in comment 3 and add the following paragraph after the table:</p> <p>In addition to the number of wheelchair spaces according to table 5, multifunctional zones, distributed over the entire length of the train and in all classes must be installed, to provide a number of spaces usable with a wheelchair of min. 4% of the total number of seats in the unit.</p> <p>These multifunctional zones have a lower level of accessibility, but offer good conditions for small wheelchairs, twin pushchairs, rollators, etc. The multifunctional zones are equipped with comfortable seats to which the wheelchair user can transfer or which can be folded up if necessary.</p>	Rejected	<p>The TSI requirements are mandatory for all rolling stock intended to circulate in Europe.</p> <p>With this in mind, the number of wheelchair spaces and multifunctional areas described in the proposal appears excessive.</p>
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<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>						
4.2.2.2 Table 5	P	RK Inclusion Handicap	<p>In order to ensure the necessary redundancy, at least 2 wheelchair places are required even in short units. Short units often run on railway lines with low passenger volume where there is a low timetable density as well. It would be a discrimination if the second wheelchair user interested in travelling would have to wait an hour or more to take the next train.</p> <p>Proposal: Delete the 3rd and 4th line in the table and revise it as follows:</p> <table border="1"> <thead> <tr> <th><b>Unit length</b></th> <th><b>Number of wheelchair places by unit</b></th> </tr> </thead> <tbody> <tr> <td>Less than 30 m</td> <td>2 wheelchair spaces</td> </tr> <tr> <td>More than 30 m</td> <td>4 wheelchair spaces in at least 2 different cars and classes</td> </tr> </tbody> </table>	<b>Unit length</b>	<b>Number of wheelchair places by unit</b>	Less than 30 m	2 wheelchair spaces	More than 30 m	4 wheelchair spaces in at least 2 different cars and classes	Rejected	<p>The TSI requirements are mandatory for all rolling stock intended to circulate in Europe.</p> <p>With this in mind, the number of wheelchair spaces in the proposal appears excessive.</p>
<b>Unit length</b>	<b>Number of wheelchair places by unit</b>										
Less than 30 m	2 wheelchair spaces										
More than 30 m	4 wheelchair spaces in at least 2 different cars and classes										

<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>
4.2.2.2	P	RK Inclusion Handicap	<p>According to the currently valid TSI-PRM, the wheelchair user is often not able to freely choose the direction of travel, the facility forces him to choose the direction of travel. Many passengers, including wheelchair users, get sick when reversing in the train. The current safety solution is wrong because the majority of trains are commuter trains and are not turned around. As a result, the wheelchair user must place himself opposite to the direction of travel one way. This must be adapted.</p> <p>Proposal: replace the text in (2) by: (2) To ensure stability, the wheelchair space must be designed in such a way that the wheelchair user can freely choose his direction of travel without endangering his safety. This is ensured by equipping all four seats in a four-facing seater compartment with comfortable folding seats that can be folded up if necessary and at the same time serve as a restraint for the wheelchair user. In order to further increase safety, wheel belts with hooks are attached to each wheelchair space.</p>	Rejected	<p>The impact on the train layout has not been evaluated. Passengers generally don't have the choice of the direction of travel in a train.</p> <p>The addition of safety belts to the wheelchair spaces was discussed in the Working Party but not retained.</p>

<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>
4.2.2.2	P	RK Inclusion Handicap	The required structure is of little or no use in reality, because most wheelchairs cannot get close enough to the structure. A large backpack hanging from the backrest or the batteries of the electric wheelchair prevent this. In addition, the required structure often makes it impossible to make optimum use of the space available. The point can be deleted without substitution, the anti-tipper will be optimally guaranteed with our proposal (see point 2) and offers a considerable added value. Proposal: Item 6 shall be deleted without substitution.	Rejected	The wheelchair space configuration as defined in the PRM TSI just starts to be used in recent trains. Some stability is needed for the manufacturers and train operators in order to get some return of experience. The requirements can then be adjusted if necessary.
4.2.2.2	U	RK Inclusion Handicap	Many wheelchair users cannot fold up the folding seats independently. Proposal: Add a second sentence in the end of the paragraph: (7) Tip-up seats may be installed in the wheelchair space but, when in the stowed position, shall not encroach on the dimensional requirements of the wheelchair space. If the folding seats are not occupied, they must fold up automatically.	Noted without change	It is not necessary to complement the TSI with this sentence: the tip-up seats are, by definition, seats that fold up automatically; (they are different from the folding seats that don't fold-up automatically). We may clarify this point further in the guide (if folding seats are used they shall fold up automatically or be folded up by the staff)

<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>
4.2.2.2	M	RK Inclusion Handicap	All passengers, including wheelchair users, want to communicate comfortably with their escorts during the journey. Proposal: Delete the last part of the last sentence "and may..." (9) At least one seat shall be available either side-by-side with or face-to-face to each of the wheelchair spaces for a companion to travel with the wheelchair user. This seat shall offer the same level of comfort as the other passenger seats, and may also be situated on the opposing side of the aisle.	Rejected	A wheelchair space being wider than a standard seat, it may be more convenient, in order to keep a central aisle, to have the companion seat on the other side of the aisle.
4.2.2.3.2	P	RK Inclusion Handicap	Wheelchair users can often not activate controls placed in a corner. The reach range in figure L1 is not sufficient for this case. Many wheelchair users cannot reach buttons in front of the wheelchair because they cannot stretch their arms at the required angle or because their feet are too far forward. Proposal: Add a second sentence in the end of the paragraph: (14) The door control or other controls shall be located either next to or on the door leaf. Controls on wheelchair-accessible doors must have clearance to allow the controls to be reached sideways. The controls shall be placed at least 40 cm, preferably 60 cm, from corners.	Rejected	The proposal represents the good practice and should be introduced in design guidelines or in a standard, which the TSI is not.

<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>
4.2.2.3.3	P	RK Inclusion Handicap	Automatic interior doors often do not detect wheelchair users. Proposal: Add a second sentence in the end of the paragraph: (5) Automatic inter-vehicle connecting doors shall operate either synchronously as a pair, or the second door shall automatically detect the person moving towards it and open. Door motion sensors shall be designed to detect the feet of a wheelchair user.	Rejected	We propose to include this clarification in the application guide of the TSI. It should be noted that most of the inter-vehicle connections don't permit the passage of wheelchair users because of their reduced width.
4.2.2.7.3.(13 )	P	Inclusion Handicap	Table 5a. : the requirements are at odds with those given by the Federal Office of Transport (FOT) via the <a href="#">Commentaires des normes FprEN 16584</a> . Proposal: replace Table 5a with the FOT requirements.	Rejected	European standards should be used when they exist, not the national standards
4.2.2.7.4. (5)	P	Inclusion Handicap	The STI-PA level is not being discussed in this version. Yet hearing-impaired interest groups in Switzerland have been asking for years to increase the level from 0,45 to 0,70. Proposal: The spoken information shall have a minimum STI-PA level of 0,70.	Rejected	This point has been discussed by the Working Party and the value of 0.45 was retained
4.2.2.9	P	Inclusion Handicap	Handrails are not being discussion in this version. Yet the revision gives the opportunity to correctly define handrails in vehicles. Proposal: If there are steps inside the vehicle, the handrails must at least reach vertically the lower edge of the last step.	Rejected	Further details about the handrails are already available in EN 16585-2
4.2.2.11.1	G	Inclusion Handicap	Table 9: It is precisely the kind of compromise that has led to the Dosto stalemate in Switzerland.	Noted without change	

<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>
Appendix M	G	Inclusion Handicap	Appendix M: the requirement of a gap of dimensions 75 horizontal and 50 mm vertical is not being modified in this version. Yet, such a gap simply cannot be negotiated independently by many wheelchair users (both manual and power wheelchair).	Rejected	The 75mm horizontal gap corresponds to the space necessary for the train wheels to run on a rail. The 50mm vertical gap corresponds to the uncompensated vertical deflection at a train access door due to the presence or absence of passengers
Appendix M	P	Inclusion Handicap	Dynamic (6 degrees, i.e. 10,5%) and static (9 degrees, i.e. 15,8%) stability are not being discussed in this version. Yet the reviewer thinks they are at odds with Table 6, which allows for slopes greater than 6 and 9 degrees. Moreover, both 6 and 9 degrees are greater than the 1:12 (8,3%) slope that is the maximum safety limit for an independent usage according to the ISO norm 21542:2011. Proposal: a modification of Table 6, with a maximum slope of 8%.	Rejected	The gradients that are specified may be necessary in order to overcome without a step the vertical difference between the access to a vehicle and the corridor above the wheels of that vehicle.
4.2.1.2.2. Vertical circulation (3a)	M/ R	ES Swiss Competence Centre for Accessibility in Architecture	The proposed deviation to point (2) is very critical in access routes to public transport. With a width of 1.20 m, it is not possible for a person in a wheelchair and a person with a rolling suitcase to pass each other. Such narrow ramps may only be taken in consideration for very short ramps with a low density of persons where there is no need to pass another person within the length of the ramp. Revise the text as proposed: (3a) When they are used as a complement to stairs, ramps with a length of not more than 1.5 m may have a width of less than 160 cm but min. 120 cm.	Noted without change	This point has been identified by the Working Party; it is proposed to add in the application guide of the TSI the following sentence:  When reducing the ramp width to 120cm, it is necessary to ensure that, from each end, the ramp is fully visible until the other end. This is necessary to avoid a wheelchair user finding herself or himself face to face with another wheelchair user.

4.2.1.2.3 Route identification (2)	R/P	ES Swiss Competence Centre for Accessibility in Architecture	<p>It is not necessary to indicate systematically all facilities by tactile walking surface indicators. A tactile surface indicator for guidance leads from one point to another. The tactile element itself does not explain the destination of a specific guided route. Persons with visual impairment either need to have knowledge about the area or to go to the end of the guiding line to find out to which facility it was leading. The more routes are applied in a transport facility or railway station, the more possible misguiding may lead persons with vision impairment to a destination they were not intended to go to. Tactile guiding information must be reduced to the absolutely necessary information for access to the public transport such as platforms, stairs, lifts, ticket counters, information points, ...</p> <p>This new requirement in (2a) is not clear and it is in conflict with the amendment in item (2) which allows to leave off tactile surface indicators if the route is indicated unambiguously by built or natural elements.</p> <ul style="list-style-type: none"> <li>- <i>what kind of facilities are meant?</i></li> <li>- <i>What is meant by "a certain type of public area"?</i></li> </ul> <p>Delete the currently proposed item (2a) «If more than one facility of a certain type of public area are provided, the route to at least one of them shall be indicated by tactile and contrasting walking surface indicators.» and replace it by: (2a) Tactile and contrasting walking surface indicators shall guide to all facilities relevant for the use of the transport system.</p>	Rejected	The paragraph has been restructured to bring more clarity. However, the text "facilities relevant for the use of the transport system " has not been retained as it may lead to interpretations.
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4.2.2.3.2 (8)	P	<p>ES                  Swiss                  Competence                  Centre for                  Accessibility                  in                  Architecture</p>	<p>Depending on the position of a person waiting for a train, it takes more than 5 seconds to localize the door opening device and approach it to be operated once the vehicle has stopped in the station. Besides the door opening signal, a signal is needed to localize the operation device from outside the train. If such a door finding signal is not provided, the door opening signal on the outside of the train shall be given for the entire time the door is released unless the door has been operated.</p> <p><i>Separate the first bullet point into two requirements, one for the door finding signal and one for the door opening signal according to the following proposal:</i></p> <ul style="list-style-type: none"> <li>• When a door is released for opening, <u>a door finding signal for persons outside the train according to G.2 shall be given unless the doors open automatically at every stop with passenger exchange. The door finding signal shall be given for the entire time the door is released unless the door is operated, in which case it may cease after 3 seconds.</u></li> <li>• <u>If no door finding signal is given, a door opening signal shall be given; it shall last for a minimum of 5 seconds unless the door is operated, in which case it may cease after 3 seconds.</u></li> </ul>	Rejected	<p>The proposal (<i>If no door finding signal is given, a door opening signal shall be given; it shall last for a minimum of 5 seconds ...</i>) does not seem aligned with the remark (<i>the door opening signal on the outside of the train shall be given for the entire time the door is released...</i>)</p> <p>Also, the Agency receives much more complaints about the nuisance that the door audible signals represent for passengers and people leaving in the neighborhood of stations than complaints about the duration of the signals. Therefore, the proposed revision aims at reducing the nuisance (for instance with the introduction of the door finding signals as an alternative)</p>
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<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>
2.3	P	City Able PT	We believe that there are enough technology on the market to reduce the gaps between the trains and platforms, reducing the dimensions applied to “Level Access” definition to lower ones. We do suggest to reduce to 3x3cm.	Rejected	The point was deeply discussed in the Working Party in order to get to the values specified.
P		City Able PT	We suggest to introduce a definition of “step free access” which defines when a train have level access plus zero gaps, and allows passengers on wheelchairs to embark and disembark in an autonomous way.	Noted without change	This proposal is interesting and will be retained for a next revision of the TSI
4.2.1.2.2.	P	City Able PT	We do suggest to introduce a maximum slope percentage allowed on infrastructure. For instance, we believe that 6% as a maximum is the optimal value	Rejected	The maximum slope percentage for infrastructure is generally regulated by a national rule that applies to all public building. We don't want to create a railway specific rule where there is no need for that.  In case there is no such national rule, a standard like ISO 21542 can be applied.
4.2.1.2.3.	P	City Able PT	We suggest to clarify that Obstacle-free routes shall be clearly identified when they are alternatives to mainstream routes.	Noted without change	This is not necessary as all 'routes' are part of an obstacle free route. Step-free routes are generally indicated by the indication of lifts, routes for visually impaired people are indicated by the provision of tactile walking surface indicators and all other routes need to fulfil the other requirements.

<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>
4.2.1.5.	P	City Able PT	These marks shall be in contrast to the surroundings and glass colours.	Noted without change	This is clarified in the application guide of the TSI ( <a href="https://www.era.europa.eu/sites/default/files/activities/docs/iu_tsi_guide_annex01_prm_tsi_en.pdf">https://www.era.europa.eu/sites/default/files/activities/docs/iu_tsi_guide_annex01_prm_tsi_en.pdf</a> )
4.2.1.8.	P	City Able PT	We suggest to have a passageway per entrance, to avoid situations where you have only one per station and force people to go around for several meters.	Noted without change	We propose to add the clarification in the application guide of the TSI
4.2.2.1.2.	P	City Able PT	We recommend to clarify that this are not the same as wheelchair spaces.	Rejected	This clarification does not seem necessary. There is no feedback that would indicate a misunderstanding of that point
4.2.2.3.2. (8)	P	City Able PT	As alternative, the door finding sound can be used, both inside and outside.	Noted without change	The TSI specifies the minimum requirements; in case train operators want to do better, they can do it without the need to indicate it in the TSI.
4.2.2.3.2. (9)	P	City Able PT	Should be possible to use an intensity variable sound or a clack sound, as option to continuous sound. This can allow to use non-annoying sounds.	Noted without change	The characteristics of the door audible signals are given in the appendix G of the TSI
4.2.2.3.2.	P	City Able PT	All door sounds should work in combination with a surrounding sound sensor to allow automatic intensity adjustment according to the surroundings.	Noted without change	The characteristics of the door audible signals are given in the appendix G of the TSI

<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>
4.2.2.7.4.	P	City Able PT	The system shall have installed inductive loops with the same level of information as standard sound announcements system.	Rejected	It is not possible to have inductive loop covering the complete train; for that reason the information provided is always audible and visible
M.2.	P	City Able PT	There are almost no wheelchairs in the market with such small wheels specifications. Smaller gaps should be provided.	Rejected	The 75mm horizontal gap corresponds to the space necessary for the train wheels to run on a rail. The 50mm vertical gap corresponds to the uncompensated vertical deflection at a train access door due to the presence or absence of passengers
G		City Able PT	Implement induced loops on lifts' emergency contact systems. (Subsystem: stations)	Rejected	The TSI can't regulate on the lifts.
G		City Able PT	For operational proposes, shall exist a "turn-up and go" definition and this shall be used as standard service. Other sorts of passenger assistance services shall be used as optional in case of turn-up and go is not possible due to technical difficulties.	Rejected	The proposal is not clear. What is a 'turn-up and go'?

<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>
4.2.1.2.2	M	FC (IE-IM)	<p>Referenced text in italics: 'Vertical Circulation - (3a) "When they are used as a complement to stairs, ramps may have a width of 120cm' Requires clarification or omission. How will a ramp used as a 'complement' to stairs be identified? Surely this just sets a minimum width of ramps?</p>	Noted without change	This sentence will be clarified in the application guide
4.2.1.2.3.	M	FC (IE-IM)	<p>Referenced text in italics: Route identification (2) new text: "Tactile walking surface indicators can be omitted when the route is indicated unambiguously by built or natural elements, such as edges and surfaces that can be followed tactually and visually."  "(2a) If more than one facility of a certain type of public area are provided, the route to at least one of them shall be indicated by tactile and contrasting walking surface indicators."  The new text added in (2) and (2a) conflict with each other. Remove 2a.</p>	Accepted	The paragraph has been restructured for more clarity

<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>
4.2.1.2.3.	P	FC (IE-IM)	Referenced text in italics: Route identification "The information shall be in Braille or in prismatic- letters or numbers. The information shall be located" Added highlighted text is unnecessary.	Rejected	The return of experience with the previous text shows that it was misunderstood. The sentence has been shortened for more clarity.
6.2.1.	G	FC (IE-IM)	Referenced text in italics: EC Verification welcome "For Infrastructure, the objective of inspection by a notified body is to ensure that the requirements of the TSI are fulfilled. The inspection is performed as a visual examination; in case of doubt, for the values verification, the notified body can ask the applicant to perform measurements. In case different methods are possible (e.g. for contrast), the measurement method shall be the one used by the applicant." This clarification is welcomed	Noted without change	

<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>
6.2.3.4.	U	FC (IE-IM)	<p>Referenced text in italics:</p> <p>Assessment of the STI-PA index for the infrastructure subsystem</p> <p>“The assessment of the requirement of point 4.2.1.11 on the STI-PA level shall be made in the same areas where visual dynamic information is provided.”</p> <p>Further clarification required as to what installations the STI-PA applies to.</p> <p>Is this limited to spoken information over PA systems only?</p>	Accepted	<p>The text will be removed.</p> <p>The STI-PA applies to the public address system specified in point 4.2.1.11</p>

<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>
Table E1	U	FC (IE-IM)	<p>Referenced text in italics:</p> <p>Site Inspection</p> <p>NoBo inspection now required for all aspects of infrastructure at construction phase (not just in the case of a change from the submitted design documents as per the current PRM TSI).</p> <p>Justification of this change should be provided as it undermines the declaration by the railway undertaking that the project has been constructed in accordance with the documents provided.</p> <p>What is the reason for this change?</p> <p>This essentially requires the NoBo to carry out their check twice, once at Design stage and again at construction stage at the cost of the Railway undertaking.</p> <p>Does this mean that railway undertakings no longer need to provide a declaration since the NoBo now appears to be taking responsibility for full site inspection confirming PRM- TSI compliance?</p>	Noted without change	<p>The site inspection is a part of the NoBo inspection in the EC verification process. The applicant always make the declaration of verification at the end of the process.</p> <p>In the course of the previous PRM TSI revision leading to the Regulation 1300/2014 the role of the NoBo was reduced, in particular, for most of the parameters applicable to stations, the site inspections were removed.</p> <p>The return of experience shows that it is necessary to have a 3<sup>rd</sup> party involved in stations, because the accessibility requirements may seem 'easy' to fulfil in theory (being mostly dimensional) but in practice there are many mistakes that can be done.</p> <p>Therefore, the site inspections are re-introduced in that revision</p>
Table 1 And Table 2	P	ED (NSA-IE)	<p>Regarding presentation – we recommend use of 'text wrapping' to show complete words.</p> <p>The first column of each table should be wide enough for the longest words.</p>	Accepted	The change will be made, but the final presentation is done by the Commission according to the template for legal texts.

<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>
4.2.1.2.(2)	P	ED (NSA-IE)	For PRM routes within buildings has consideration been given to 200cm width for wheelchair users? The 200cm would be commonly used for wheelchair users navigating within buildings.	Rejected	The requirement for the width of obstacle free routes is 160cm since the PRM TSI of 2008. This point has not been discussed in the current revision.
4.2.1.2.2 (2a)	P	ED (NSA-IE)	Referenced text in italics: As a minimum the first and last steps of a flight of stairs shall be indicated by a contrasting band. This requirement shall apply from a single step.  For 'a contrasting band' consider using 'a band of good tonal and colour contrast'.	Rejected	The term 'contrasting band' is used in several places of the TSI
4.2.1.2.2 (3)	P	ED (NSA-IE)	The term 'moderate gradient' is vague and undefined. At the end of this text consider adding that gradients of more than 5% (i.e., 1:20) to be discouraged to allow unmotorised wheelchairs to navigate. A maximum slope of 8% (i.e., 1:12) may be allowed but for a maximum length of 2m.	Rejected	The maximum gradient for infrastructure is generally regulated by a national rule that applies to all public building. We don't want to create a railway specific rule where there is no need for that.  The term 'moderate' is deliberately used because, according to the national rules in force, it may have a different technical meaning.  In case there is no national rule, a standard like ISO 21542 can be applied.
4.2.1.2.3 (3)	G	ED (NSA-IE)	Welcomed and seen as of merit.	Noted without change	

<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>
4.2.1.9 (1)	P	ED (NSA-IE)	Has consideration been given to specification of an illuminance level of 150 LUX in this instance?	Rejected	For the platforms a reference to EN 12464-1 & -2 is made.  For the other areas of a station, there may be national rules applicable to public building; therefore the TSI expresses high level functional requirements that can be fulfilled by the application of the national rules or, if such rules don't exist, of standards.
4.2.1.9 (2)	P	ED (NSA-IE)	Has consideration been given to specification of an illuminance level of 150 LUX in this instance with 200 LUX at steps and stairs in this instance?	Rejected	Same remark as above
4.2.1.10, 4.2.2.7.2 (4) and Appendix N	P	ED (NSA-IE)	For ease of reference it may be beneficial to depict the induction loop and international wheelchair signs in Appendix N.	Rejected	

<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>
4.2.2.6 (3)	CN	ED (NSA-IE)	<p>Referenced text in italics:</p> <p>A turning space, with a minimum diameter of 1500mm, shall be provided adjacent to the wheelchair space and in other locations where wheelchairs are supposed to turn 180°. The wheelchair space may be part of the turning circle.</p> <p>Recommend replacing the word 'are supposed to' to 'need to'. Recommend amending '180°' to '180°'.</p>	Rejected	<p>'Supposed to turn' and 'need to turn' have subtly different meanings here: 'supposed to turn' is about turning where there is an appropriately designed space to turn, 'need to turn' implies more of a subjective decision by the wheelchair user.</p> <p>We will also add in the guide that the vestibule is not always a place where wheelchair users are supposed to turn 180°.</p>
4.2.2.8.(1) and 4.2.2.11.2	U	ED (NSA-IE)	<p>Has a maximum riser height of 180mm been considered instead of 200mm?</p> <p>Also has a minimum tread depth of 300mm been considered instead of 280mm? (i.e., dimensions in accordance with BS 8300 Cl 5.9.2.)</p>	Rejected	These values are unchanged since the first TSI version, they were not put in question in the course of the latest revision
4.4.2	CN	ED (NSA-IE)	<p>Referenced text in italics:</p> <p>Safety of Manual and Powered Wheelchair Boarding Aids</p> <p>'Operational rules shall be implemented to ensure that train and station staff is able to safely operate boarding ramps, with respect to deployment, securing, raising, lowering and stowing.'</p> <p>Recommend replacing 'station staff is able' to 'station staff are able'.</p>	Accepted	

<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>
5.3.1.2 (5)	P	ED (NSA-IE)	Referenced text in italics: 'The ramp surface shall be slip resistant and shall have a stable position with an effective clear width of a minimum of 760mm.'  Consider changing to 'the entire ramp surface'.	Rejected	The revised EN 16585-2 will cover the point
5.3.1.3.(4)	P	ED (NSA-IE)	Consider specifying requirement for slip resistance - consider SRV values (pendulum test values).	Rejected	To our knowledge there is no EN standard on slip resistance. Therefore the TSI remains of high level so that national standards can be used when they are relevant.  See application guide points 2.3.1 and 2.3.6: <a href="https://www.era.europa.eu/sites/default/files/activities/docs/iu_tsi_guide_annex01_prm_tsi_en.pdf">https://www.era.europa.eu/sites/default/files/activities/docs/iu_tsi_guide_annex01_prm_tsi_en.pdf</a>
5.3.2.9 (1)	CN	ED (NSA-IE)	As these slopes are far in excess of 8% (1:12) and 5% (1:20) it is assumed that assistance will be provided. Should this be stated?	Noted without change	We will explain in the guide that when used with such a high angle slope, crossing the ramp should be made with assistance and that it is preferable to use the boarding aid with smaller ramps. The value of 10.2° represents a maximum theoretical value.
5.3.2.9 (5)	P	ED (NSA-IE)	Consider specifying requirement for slip resistance - consider SRV values (pendulum test values).	Rejected	See point above

<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>
Appendix B and other unused Appendices	P	ED (NSA-IE)	Consider removal of used appendices and updating all main text references to appendices.	Rejected	We think we should keep the numbering of appendices as it is, so that it remains clear for TSI users that, for instance, Appendix M is the reference wheelchair.  Otherwise, according to the version of the TSI, the reference wheelchair could be described in appendix M or D...
Appendix E	G	ED (NSA-IE)	Design stage and construction stage assessments are seen by NSA-IE to be of notable merit as a two-stage check. This process also allows for design stage issues following detailed design to be addressed in advance of construction commencing.	Noted without change	
Appendix B	G	DC (NSA-IE)	It is not clear to me where the harmonised table of contents for the NIP will be shown in the revised TSI	Noted without change	Still to be discussed, but this point will be added by the Commission further to discussions in the PRM TSI Advisory Body.
Appendices H, I, J, K, and L	G	DC (NSA-IE)	Propose that ERA consider how the wholeness of the TSI as a document is affected by removing Appendices H, I, J, K, and L	Noted without change	See point above

<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>
Appendix M Interoperable wheelchair transportable by train	P	CP	The appendix M should clearly state that wheelchair manufacturers should include in the information provided to prescribers, purchasers and users of wheelchairs, if a given model exceeds the limits prescribed by this appendix (as consider in EN 12183 – Manual wheelchairs, section 12.3 and EN 12184 – Electrically powered wheelchairs, scooters and their chargers, section 13.3).	Noted without change	The PRM TSI can't include any requirement for wheelchair manufacturers. However, the listed wheelchair standards EN 12183 & 12184 already mention that the manufacturers need to indicate to a user if the wheelchair dimensions exceed the values of appendix M.
Appendix A Standards or Normative Documents Referred to in this TSI	P	CP	If comment N° 1 is accepted, the appendix A should include a new index relating to Appendix M and mentioning the EN 12183:2014 and EN 12184:2014.	Rejected	The purpose of this reference is not clear; the reference is made already in standards EN 12183 and EN 12184

<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>
		European Guide Dog Federation	<p>Rolling Stock subsystem; Providing services on-board trains</p> <p>When a service is provided to passengers in a specific area of a train that cannot be accessed by wheelchair users or other PRMs, operational means shall be in place to ensure that:</p> <ul style="list-style-type: none"> <li>• free of charge assistance is available to assist wheelchair users reach the service or</li> <li>• the service is delivered free of charge to wheelchair users at the wheelchair spaces unless the nature of the service makes it impossible to provide it remotely.</li> </ul> <p>EGDF recommends: this service should not be limited to wheelchair users, it should also be provided to persons with other types of disabilities; for example, a person travelling with a guide dog would have great difficulty walking to the buffet car with their guide dog on a moving train, purchasing food, and carrying it back to their seat. People with other disabilities should have free of charge assistance to reach the service or it should be delivered to them where they are seated.</p>	Rejected	<p>Unlike wheelchair users who are well located in a train and who have access to communication means, persons with other types of disabilities are distributed along the train (on the 10% priority seats, but also certainly on other seats for some of them) and have no communication means. Therefore, from an operational perspective, providing such service where they are seated is not possible.</p>

<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>
		European Guide Dog Federation	<p>Need for further improvement</p> <p>In addition to the recommendation given for the current revision, EGDF hopes that the following aspects of the Regulation will be addressed during a foreseen comprehensive revision of the TSI PRM:</p> <ul style="list-style-type: none"> <li>• Need for accessible dog “spending areas” at stations.</li> <li>• No restriction on the number of assistance dogs that can travel per carriage. Persons with disabilities should be able to travel in groups like everyone else.</li> <li>• Freedom and possibility of choice between 1st and 2nd class for assistance dog users.</li> <li>• Need for sufficient space for assistance dogs both in 1st and 2nd class in all new rolling stock.</li> <li>• Adopt Eurostar’s practice of reserving an adjoining seat for the assistance dog to ensure adequate floor space. The ticket for the assistance dog should be free of charge and the team should be seated where there is adequate legroom, such as at a table or a vacant wheelchair space. The assistance dog user needs to be able to book tickets for the team in advance or just before travel.</li> <li>• Assistance dog users should be able to book online for themselves and their assistance dog.</li> </ul>	Noted without change	These points will be reported for a future revision

<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>
		NSA AT	there are no AT-objections to this draft of PRM TSI.	Noted without change	
Point 4.2.1.10 (2)	U	NSA PL	The proposed change in the sub-point 2 of point 4.2.1.10 is too precise. The definition of a precise, unambiguous height level, at which the information related to the train departure (160 cm) is available can lead to a presentation of such important passenger information in the form unavailable for persons in the wheelchairs. Proposal for change: introduce the range of height at which such information should be presented (from...cm to... cm).	Rejected	The requirement is clarified in the application guide.
Point 4.2.2.3.2 (8)	P	NSA PL	According to p.4.2.2.3.2. sub-point 8 par.3, train closing door signal should be initiated at least 2 seconds before the closure. Similar requirement is in the current TSI PRM.  Taking into account a moving ability and time reaction of PRM persons, 2 seconds are sometimes too short. Due to reduced mobility and time reaction of aged people it is reasonable to extend this time.	Rejected	The Agency receives much more complaints about the nuisance that the door audible signals represent for passengers and people leaving in the neighborhood of stations than complaints about the duration of the signals.
Point 4.4.2	M	NSA PL	Editorial note. The project implies the change of p.4.4.2 par.3. Meanwhile, given in the bracket the reference should refer to 4.2.2.1.2.1.(2), it means sub-point 2 in the p. 4.2.2.1.2.1	Accepted	Thanks for reviewing
Point 7.2.1.1.4.	U	NSA PL	More clarification requires the issue to whom the user should report a feedback. Moreover the procedure of reporting feedbacks should be defined, among others with application of which platform	Noted without change	This aspect (Inventory of assets) is not covered by the current revision proposal.

