

#	N°	Reference (e.g. Art, §)	Type	Reviewer	Reviewer's Comments, Questions, Proposals	Reply	Proposal for the correction or justification for the rejection
1	1	TSI PRM, Appendix P	G	Banedanmark	Introduces a clause, which effectively restricts that Interoperability Directive art. 7, 1. (a), in that it can only be used for 7 years with regards to TSI PRM. On principal, restrictions on the application of the Interoperability Directive should not be introduced in the individual TSIs. This regulation should be negotiated as part of a revision of the Interoperability Directive. Same clause also appears in TSI NOI, and same comment should also be applied here.	R	The new appendix P is to be read with the new chapter 7 on the implementation of the TSI. The 7-years period gives the possibility to continue using the previous TSI for ongoing projects, but for a limited period of time (which corresponds to the current duration of 'phase A'). This new transition regime is implemented for all TSIs applicable to rolling stock.
2	2	TSI PRM RECOMMENDATION ERA-REC-128-2, (52)	G	Banedanmark	Appendix B to be erased/marked as "not used", however, Appendix B is the foundation for the Danish prioritization of funding for stations, and is therefore in use. Erasing Appendix B will risk being a major cost-driver for future projects, and Banedanmark promotes that Appendix B is kept also in future revisions of TSI PRM.	D	Appendix B is marked as 'not used' because it is expected that it will be replaced by 'common priorities and criteria' according to Article 8 (7) of the PRM TSI. In case there are no 'common priorities and criteria' identified, the Appendix B may be kept as a guidance for the National Implementation Plans
3	3	TSI PRM RECOMMENDATION ERA-REC-128-2 (55)	G	Banedanmark	In table E.1 it is being proposed that all clauses should be inspected both in design/development and construction. This is unnecessary and excessive and will result in a noticeable increase of expenses for Infrastructure Managers, Station Managers and Railway Undertaking during the verification procedure and with no added benefits for those parties.	R	This point has been extensively discussed during the meetings of the Working Party and the conclusion is that a site inspection is necessary.
4	4	TSI PRM RECOMMENDATION ERA-REC-128-2	G	Banedanmark	Banedanmark opposes more narrow regulations on the height and width of platforms. Currently the height of platforms, when renewed or upgraded, are required to match the requirements of train operation for a foreseeable future. We see no need to require height-changes which do not match the current operational demands of the railway. Moreover, it should be noted that changing platform heights are very expensive works, as it requires a change in the construction/foundation of the platform. Platform width is often restricted by existing objects (such as buildings, houses, stairs etc.) – some of which are protected as landmarks, as well as the high cost of changing the platform width altogether, therefore any revision of platform width should include reference to 7.2.2. Requiring a minimum of 160 cm in width for obstacle-free routes without including 7.2.2. will risk making renewing or upgrading existing platforms impossible or increasingly expensive, and therefore not cost-beneficial.	NWC	The current revision of the PRM and INF TSIs doesn't address that point. However, it is a recurring demand from users associations to improve the interface from platform to train. The current target system as described in the INF TSI permits to have platform heights from approximately 200mm to 1200mm, a range of values that can't be considered satisfactory as a "target". According to Article 4 (4) of Directive 2016/797, "Each TSI shall be drawn up on the basis of an examination of an existing subsystem and indicate a target subsystem that may be obtained gradually within a reasonable timescale". In terms of platform characteristics, the content of TSIs is a description of the existing subsystem but the target is missing.
11	1	7.1.1	G	CER-EIM	Concerning INF part, for old projects, chapter 7.1.1 is referring to the the use of PRM TSI 2008, and not also referring to PRM TSI 2014. We understood that currently it is not decided if the revision of the TSIs will end in an amendment of the TSIs or in new TSIs. In the first case we would still be in the 2014 TSI and the projects signed before 2014 would be allowed to fulfil the 2008 TSI. In the second case we think 7.1.1 would need to add the PRM TSI 2014 in the same way as the TSI PRM 2008 is mentioned.	A	The TSI text will be changed
21	1	7.2.1.1	G	DSB	It is stated that a Data Collection Tool shall be made available by the Commission. We will appreciate if we can receive a status from the Commission regarding the implementation of the data collection tool. In regulation 2019/772 it is stated that another database shall be used until the inventory of asset database has been implemented. We think that the current database is not fit for the purpose of collecting station data.	NWC	Due to some unforeseen IT difficulties, the start of the inventory of assets cannot take place as foreseen for 2022. Those difficulties are addressed and will be closed by and adaption of an existing software solution to the needs of the inventory of assets. Concerning the data collection in the member states: ERA has in the meantime refined the data to be collected for the Inventory of assets and created a list of those data, which have to be collected from the entities in charge of the data collection. The document is available at EA's website: https://www.era.europa.eu/sites/default/files/activities/docs/ersad_accessibility_data.pdf

22	2	7	G	DSB	DSB has been promised that the operation of ticketmachines from the side will be included in the application guide. However, this has not yet happened.	NWC	The following sentence is planned in the application guide: "Accessibility to the ticket vending machines can be fulfilled by alternatively sideward or frontal approach of the wheelchair user. In case of sideward use, no free space under the ticket vending machine is needed". That version of the application guide was discussed by a Working Party in the context of Recommendation ERA-REC-128-2 from 2020 that isn't yet adopted; for that reason, that version of the guide hasn't been published yet but it will be with the TSI package 2022
23	3	7	G	DSB	In Denmark the NoBo's has announced that it is required that we establish guiding patterns to the ticket machines at stations. So far, the presumption has been that a customer's use of guiding patterns means that he or she has such impaired vision that the ticket machine can not be operated. There are disadvantages to installing guiding patterns, including the fact that people with walking difficulties can stumble across them. Therefore, guiding patterns should only be used for specific needs.	NWC	There shall be tactile walking surface indicators to the ticket vending machines (according to PRM TSI clauses 4.2.1.2 and 4.2.1.2.3).
24	4	4.2.1.7	G	DSB	In the application guide it should be mentioned that the use of the term radius 2 corresponds to the term regarding sharp edges	NWC	In the application guide it is explained (for clause 4.2.1.7, by a reference to clause 4.2.2.1) that "a sharp edge is a thin edge capable of cutting or an abrupt end or discontinuity of a surface, which has the potential risk to injure a passenger in normal use".
31	1		G	NSA FR	We regret that only chapter 7 of PRM TSI was submitted to consultation.	NWC	<p>The reason is the following: In 2020 ERA sent a Recommendation to the Commission to amend the TSI PRM. It was Recommendation ERA-REC-128-2 available on our website (https://www.era.europa.eu/sites/default/files/library/docs/recommendation/era_rec128-2_recommendation_en.pdf). That Recommendation hasn't been submitted yet to the opinion of the RISC, so the proposed changes are not in the consolidated version of the TSI. They will be submitted to the opinion of the RISC together with the other changes of the 'package 2022'.</p> <p>In the current revision, we only propose to amend the transition regime of the PRM TSI in line with the other rolling stock TSIs. This proposal impacts the chapter 7 and results in the creation of a new appendix P where the changes are listed and categorised. For that reason, in the version for the consultation, we included only the chapter 7 and the new Appendix P of the PRM TSI. We don't want to raise confusion by including the other chapters either without the changes from REC 128-2 (some may question why these changes approved by a WP aren't in the document) or with those changes (some may think that these changes are also part of the consultation, which isn't the case).</p> <p>We also wrote: "this document reflects the main proposals for the evolution of the PRM TSI. It contains only the chapter 7 and the new Appendix P, because these are the chapters where changes are proposed. This document should be read as a continuation of the Recommendation ERA-REC-128-2 from 2020 available on ERA website. In particular, the new Appendix P is a categorisation of the</p>
39	1	Table of contents of the Annex	M	Ministry (LT)	<i>Appendix P should be appended to Table of contents</i>	A	The table of contents will be finalised with appendixes before the adoption of the revised TSIs
40	2	Section 4.2.1.2.2 point 3 of the Annex	P/U	Ministry (LT)	<i>In section 4.2.1.2.2 point 3 of the Annex it is written that "Ramps shall be installed for persons with disabilities and persons with reduced mobility unable to use stairs where lifts are not provided. <u>They</u> shall have a moderate gradient." For the sake of clarity we proposespecifying the term "they".</i>	R	This isn't necessary. It is clear enough that it refers to the ramps

41	3	Section 5.3.1.1 point 3 of the Annex	P/U	Ministry (LT)	<i>In section 5.3.1.1 point 3 of the Annex the term „Reading distance“ is mentioned for the first time in this TSI. This term is also used in section 5.3.2.7 table 13 as well as in Appendix N (N2). For the sake of clarity we propose specifying the term “Reading distance” in section 5.3.1.1 point 3 of the Annex.</i>	D	Viewing or reading distances are specified in points 4.2.1.10. (15) for infrastructure and 4.2.2.7.3 (13) for rolling stock. A clarification could be provided in the application guide if needed, this point should be brought to the Working Party. Note: this request for clarification wasn't raised by any other stakeholder so far.
42	4	Section 7.1.2 point 2 of the Annex	P/U	Ministry (LT)	<i>Section 7.1.2 point 2 lacks reference to appendix P. Supposedly, In section 7.1.2 point 2 instead of “Annex P” there should be “Appendix P”.</i>	A	The correction will be done
43	1	Appendix P Tekst	D	NSA NL - 2	Is it correct to state that an (old) TSI can still be applicable for approx 14 years: 7 years for period of pre-engagement and another 7 years for type approval. The text is not clear for unambiguous explanation.	NWC	The text is to be read with the chapter 7 of the PRM TSI and also of the LOC&PAS TSI. Appendix P lists the changes for which the previous TSI can still be used for a duration of 7 years after entry into force of the revised TSI. More explanation will be provided in the application.
44	2	Appendix P Table 1: When the door is closed locally	D	NSA NL - 2	This should also be applicable for cabin doors which were used for (dis)embarkment.	R	The PRM TSI addresses only the passengers.
53	1	7.1.1	G	Trafikverket	Concerning INF part, for old projects, chapter 7.1.1 is referring to the the use of PRM TSI 2008, and not also referring to PRM TSI 2014. We understood that currently it is not decided if the revision of the TSIs will end in an amendment of the TSIs or in new TSIs. In the first case we would still be in the 2014 TSI and the projects signed before 2014 would be allowed to fulfil the 2008 TSI. In the second case we think 7.1.1 would need to add the PRM TSI 2014 in the same way as the TSI PRM 2008 is mentioned.	A	The TSI text will be amended in the recommendation