The Track-side Subsystem with the TSI.

The Operational Test Scenarios are main tool to prove the compliance

2.1.2.7 P Frank Schiffmann Partial section seems weak. The need shall be clearly derived from the function. Observe a barrier in train access mode, demanding a green light for different trackside installations in the network. The exact TSI types, BBP and track

2.1.2.18 U Frank Schiffmann The text concerning track condition is outdated. If no change is made in TSI EN version 4.4 it is parallel. 미해당: the opinion of ERA on the mandatory need of having track conditions in case of trackside ETCS installation? Formerly, there is the need to change the text of the CCS TSI.

2.1.2.15 U Frank Schiffmann The CCS TSI must keep separated the requirements for independent verification bodies (e.g. ERA) that verify compliance or conformity. There are two types of checks: a) the NoBo is able to do the verification of the CCS TSI requirements. The test for conformity must be carried out by the NoBo for the test subsystem as per performed verification. The test reproducibility is the aim of "assessment body" instead of the user, due to the lack of knowledge that "assessment body" in CCS EN is named.

2.1.2.14 U Frank Schiffmann The CCS TSI must keep being applied the requirement for independence verification bodies. In Reg. 402/2013, it will be the requirement for "conformity of conformity". Those two types of checks are a) the NoBo is able to do the verification of the CCS TSI requirements. Test for conformity must be carried out by the NoBo for the test subsystem as per performed verification. The test reproducibility is the aim of "assessment body" instead of the user, due to the lack of knowledge that "assessment body" in CCS EN is named.

2.1.2.3.1b U Frank Schiffmann Why is Level 1 named here? Seems to be only mandatory for ETCS Level 1 plus ATO application. In Section 7.3.2 there is a clear split between L1 for Radio Infill with GSM-R and Level R elsewhere in case of FRMCS.

2.1.2.2 U Frank Schiffmann The FRMCS documents do not enable to build a system. PRI, SIR, TSI is not on the same level compared to TSI. Thus, it cannot be any requirement for system verification.

2.1.2.16 U Frank Schiffmann "radio" is missing, to link to MNOs. In addition it could be given, that this is a way for early implementation for ATO when FRMCS is not available yet.

2.1.2.13 P Frank Schiffmann Change title from ETCS only towards ETCS/ATO

2.1.2.11 U Frank Schiffmann 1-SIGNON

2.1.2.17 U Frank Schiffmann The comment against 4.2.16, SS-15 includes DAS functionality which is considered as ATO GoA1. The ICC Basic parameter 4.2.15 is cross-referenced with OPE TSI. The second part of the comment is not understood.

2.1.2.10 U Frank Schiffmann The last sentence seems weak, as requirement. TSI EN and TSI Focus (TSI载体): What shall be the reference there as a complete vehicle? In addition the wording of harmonised interactions is fine, but one accuracy of market-based

2.1.2.9 U Frank Schiffmann In Table 2.19 several III safety function are not mentioned. In Table 2.19 it could be noted, that some IIIs have been deleted in TSI. The protection of fire is needed for this issue. The proposal has been discussed but not retained as it is considered that ETCS is managing the display information from TSS and ETCS driver.

2.1.2.8 U Frank Schiffmann The goa 4.2.16 is not able to be assessed yet. In addition it could be given, that this is a easy for ready implementation for ATO when PRIEM is not available yet.

2.1.2.7 P Frank Schiffmann Change title from ETCS only towards ETCS/ATO

2.1.2.6 U Frank Schiffmann See as commented against 4.2.2.16

2.1.2.5 U Frank Schiffmann The CCS TSI must keep separated the requirements for independent verification bodies (e.g. ERA) that verify compliance or conformity. There are two types of checks: a) the NoBo is able to do the verification of the CCS TSI requirements. Test for conformity must be carried out by the NoBo for the test subsystem as per performed verification. The test reproducibility is the aim of "assessment body" instead of the user, due to the lack of knowledge that "assessment body" in CCS EN is named.

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§ 7.2.7.1 refers to a questionnaire prepared by the Agency which must receive a response within 3 months of its release. What is the form and content of this questionnaire and how is it distributed? Similarly, how is the summary of questionnaires prepared by the Agency to be distributed? We propose that the general error handling process for all stakeholders (manufacturers, RIs and IMs) be described more precisely in the CCS TSI guide.

2. 7.2.7.3 U Frank Schiffmann

We are surprised that the Agency has not taken financial aspects more into account in the new error handling process. Indeed, specific technical evaluations will have to be carried out by the IMs to be able to answer the ERA questionnaire and to implement the repair of errors and the correction of errors that are known to be incorrect. Therefore, there will be too few resources and too many technical issues to validate the financial impact of these errors.

7.2.7.3 P LP

To ensure the feasibility of this process, we propose that the financial impact of errors be considered in the response to the ERA questionnaire. This will ensure that the IMs can plan the necessary resources to implement the repair of errors and to implement a comprehensive train modularity addressing evolvability and updatability of the system.

Validity of previous comments

1. 7.2.7.1 P

The deadlines for studying and carrying out the correction of errors are important for the compatibility of the technical study and consultations with the ETCS, which is achieved within 6 months. To ensure the feasibility of this process, we propose that the financial impact of errors be considered in the response to the ERA questionnaire. This will ensure that the IMs can plan the necessary resources to implement the repair of errors and to implement a comprehensive train modularity addressing evolvability and updatability of the system.

Specific maintenance

3.- AGIFI

Technical Compatibility issues should be solved to ensure that technical opinions and given information e.g. by UNISIG Hazard Log and BCA.

1.- UTP

If the CCS TSI is revised to include error corrections that have been approved, this would not take this logical approach, this will require clear trackside knowledge of vehicles that have received an APM either from the Agency or the National Safety Authority and that are authorized to circulate or operate on their network. As a result, the ETCS does not have the possibility to know all the vehicles authorized on their networks to set up an experience organization of cost per authorized vehicle in the normal activity. The proposed that the process be agreed to clearly that the TSI has a consultation with the TSI that has returned an updated trackside knowledge of vehicles that have been approved.

In the exceptional cases where an IM authorisation, but it can't be excluded in all cases.

Ref 119/120/147 are considered mature.

Rus for solving error corrections, with the target to move to TSI Application Guide. If a vehicle is operating only in work mode in the construction area there is no obligation to technical opinions and given information e.g. by UNISIG Hazard Log and BCA.

The ETCS system version 3.0 is accompanied by a strict transition between two publications be extended to 2 years so that we can at least complete a full cycle of error correction before starting a new one.

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18 6.1.5 and 6.1.7.2 P UTP

Request for a clause on exceptional deviations to override Partial fulfillment.

The comments raised in paragraph 6.1.5.1 and 6.1.7.2.1 of the TSI have been partly taken into account in the opinions of the IMs. However, some aspects need to be further considered in the context of the revision, especially concerning the possibility of including the introduction of Partial fulfillment in the TSI. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

18 6.1.5.1.2 P UTP

Request for a clarification of the definition of Partial fulfillment.

The Agency clarifies that Partial fulfillment is a concept related to the implementation of the TSI and its requirements. It is not a concept related to the definition of the TSI itself. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to confirm that Partial fulfillment is a concept related to the implementation of the TSI and its requirements, and to clarify the conditions for its implementation.

The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

19 6.2.3 P UTP

Request for a clarification of the definition of Partial fulfillment.

The Agency confirms that Partial fulfillment is a concept related to the implementation of the TSI and its requirements. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

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19 6.2.3 (3) P UTP

Request for a clarification of the definition of Partial fulfillment.

The Agency confirms that Partial fulfillment is a concept related to the implementation of the TSI and its requirements. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

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The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

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21 3.1.3 P UTP

Request for a clarification of the definition of Partial fulfillment.

The Agency confirms that Partial fulfillment is a concept related to the implementation of the TSI and its requirements. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

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Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

APPENDIX A

French NSP has been invited to the meeting, and other NSPs have been invited to the meeting. The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

APPENDIX C

The functions partially implemented shall be identified in a single document accompanying the EC certificat of IC and Subsystem. Possible impacts on safety, interoperability or other aspects (ergonomy) should be identified.

The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

APPENDIX D

The comments are related to CCS project introduced in CCS WP 63.

The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.

APPENDIX E

The comments are related to CCS project introduced in CCS WP 63.

The Agency confirms this. The deadline of June 2023 is for the cases where there is no notification of RSC for existing lines.

Proposed: to include in the TSI a clause allowing for Partial fulfillment and to clarify the conditions for its implementation.

Proposed: the Agency will consider the possibility of including Partial fulfillment in the TSI in the context of the revision process.

Comments provided in this meeting, if any, to be included in the CCS TSI vote:

The definition of Partial fulfillment was not possible by the Agency in the CCS TSI vote.

If there is a solution developed for CR 1370 to be part of the CCS TSI 2022 vote: there is not a solution currently being worked on before the CCS TSI 2022 vote.
7.2.7.1 G Denis Garnier

The new proposed process will require an additional workload for the Infrastructure managers. In particular, the obligation for IMs to assess all CRs will require new resources and might not be achievable for all IMs today.

5.- NSA FR

7.2.6.2 G Denis Garnier

In case the envelope of legally operated ETCS system versions is modified during vehicle production, an agreement should be found between IM and RUs.

7.2.7.3 G Denis Garnier

For notified system versions in RINF for the intended area of use of the vehicle. The vehicle type shall implement the ETCS system version which complies as a minimum to the notified ETCS system version which become applicable in the next 5 years to the creation of different vehicles versions or variants, which exactly goes at the opposite of sector’s needs for stability.

The requirement for ETCS version should be checked at type authorization only. Any ground modification announced through RINF during a vehicle delivery period shall not lead to the implementation of different versions on board and therefore to § 6.1.1.3 shall be possible.

Vehicles that are not equipped yet with ETCS shall only install ETCS if ETCS is implemented or foreseen to be implemented ... to § 7.4.1 and corresponding RINF notifications) in the extended part of the area of use. Partial fulfillment according to appropriate sections of appendix B.

At least once on-board, the specifications of ATO in Appendix A of this TSI shall be applied.

This requirement cannot apply for occasional circulations (transfer of vehicles for maintenance purposes, special vehicles, etc.)

The IM shall not have the possibility here to define an error as “unacceptable” if this error was not previously identified as “unacceptable” in the process described in § 7.2.7.1. On the contrary, it may be possible that an error considered as “unacceptable” at a general level becomes “acceptable” at the level of a particular network because the related functionality is not implemented or used because the IM and RUs can find sustainable mitigation solutions for all parties.

The IM shall not have the possibility here to define an error as “unacceptable” if this error was not previously identified as “unacceptable” in the process described in § 7.2.7.1. On the contrary, it may be possible that an error considered as “unacceptable” at a general level becomes “acceptable” at the level of a particular network because the related functionality is not implemented or used because the IM and RUs can find sustainable mitigation solutions for all parties.

The exceptions are amended by point 7.3.2.3.2.3.2.1 and 7.3.2.3.2.3.2.2 of Appendix A.

The requirement is to prevent errors to be propagated from the NSAs to the IMs or to the RUs and therefore to make sure that the ETCS system is properly installed and configured.

The requirement is to ensure that the IMs cannot be used for the area of use of vehicles.

The exceptions are amended by point 7.3.2.3.2.3.2.1 and 7.3.2.3.2.3.2.2 of Appendix A.

The exceptions are amended by point 7.3.2.3.2.3.2.1 and 7.3.2.3.2.3.2.2 of Appendix A.

The requirement is to ensure that the IMs cannot be used for the area of use of vehicles.

The exceptions are amended by point 7.3.2.3.2.3.2.1 and 7.3.2.3.2.3.2.2 of Appendix A.

The requirement is to ensure that the IMs cannot be used for the area of use of vehicles.

The exceptions are amended by point 7.3.2.3.2.3.2.1 and 7.3.2.3.2.3.2.2 of Appendix A.

The requirement is to ensure that the IMs cannot be used for the area of use of vehicles.
68 | T.5.6 | S | Dennis Garnier | In addition to position expression regarding partial fulfillment, error correction and extension of area of use, the role of Member States regarding ETCS implementation has to be maintained. Therefore the whole paragraph 1.5.6 should be kept as is to ensure clarity.

Please note that the French item 3 of the French order of 11/16/2010, replaced by the French order of 08/12/2011, was not taken into application of the current T.7.6.3, as conditions for further vehicle equipment until the end of 2016. The revised TIE shall be compiled and this order regarding the communication of the implementation requirements (see paragraph 1.5.6). The revised order to be both backward and forward compatible to a coordinated draft.

Please note that Member States may include other remarks on the joint assignment (TIE 7.6.3, etc.)...
### Table A3: Development of the CSM-RA methodology

<table>
<thead>
<tr>
<th>No</th>
<th>Requirement</th>
<th>Impact of a change of the compliance of the subsystem with the TSI can only be assessed by the subsystem NoBo and not by the IC NoBo or the AsBo.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Requirement definition is extending the scope by defining that the assessment of this criteria needs to be performed by a CSM Assessment Body. This is contradicting the basic principle of the EC verification activities performed by the NoBo. The body performing the conformity assessment should be independent of the product developer. The application may direct to support a CSM Assessment Body instead of a NoBo for the evaluation of the product according to 6.1.1. In such a case, the NoBo will accept the report delivered by a CSM Assessment Body in respect of the provisions of the TSI in combination with the annexes of implementing Regulations (EU) 805/2013 and (EU) 803/2013. The current application of the risk management process as set out in Annex II of the Regulations (EU) 805/2013, as well as the appropriateness of the results from the application in the framework of the NoBo, shall be independently assessed by the Method Body performing the conformity assessment, and the NoBo will not account assessment activities performed by a CSM Assessment Body in its own. Such CSM Assessment Body shall be accredited or recognised by a CSM assessment body in any. The noBo shall take into account assessment activities performed by a CSM Assessment Body. The CSM Assessment Body shall be accepted by the NoBo and not by the IC noBo or the AsBo.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Requirement as referred in Appendix A, Table A3 are in fact appropriate means of compliance with the CSM-RA methodology. The comment is on existing text in the TSI which simply moved from former version to the current version of the text. The text has been amended and reference to on-going revision of the TSI is to be included in the TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote.</td>
<td></td>
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<tr>
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<td>Requirement as referred in Appendix A, Table A3 are in fact appropriate means of compliance with the CSM-RA methodology. The comment is on existing text in the TSI which simply moved from former version to the current version of the text. The text has been amended and reference to on-going revision of the TSI is to be included in the TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote.</td>
<td></td>
</tr>
<tr>
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<td>Requirement as referred in Appendix A, Table A3 are in fact appropriate means of compliance with the CSM-RA methodology. The comment is on existing text in the TSI which simply moved from former version to the current version of the text. The text has been amended and reference to on-going revision of the TSI is to be included in the TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote. There are 2 discussions ongoing which must be solved before the CCS TSI 2022 vote.</td>
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Proposal: Relaxation of the obligation to install the ETCS system on board the vehicles intended for the construction and maintenance of railway infrastructure is not necessary for those vehicles, which are not connected to the track. The ETCS system is not necessary for them to be in the above condition, e.g. for enabling the driver to install the ETCS system onboard the vehicle in the condition of the vehicle.

As FOT participates in the TSI CCS WP (Michael Riemenschnitter) there are only few additional comments in the framework of this public consultation. Chapters 4.2.4, 4.2.5 envisaged as soon as the train system is compatible with the interoperability requirements.

A function in the pure numeric speed dial that changes the speed restriction and is envisaged to be used as the train restricts its fully compatible with the interoperability requirements. A function in the pure numeric speed dial that changes the speed restriction and is envisaged to be used as the train restricts its fully compatible with the interoperability requirements. A function in the pure numeric speed dial that changes the speed restriction and is envisaged to be used as the train restricts its fully compatible with the interoperability requirements.

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G 7.6.2.12 Ireland - 4.2.12 ETCS DMI "The ETCS DMI shall only show the driver the set of fully compatible numeric speed restrictions in km/h or 80 km/h."

Comments: This concerns the range of speed selectable in the DMI and is similar to the configuration by the Irish Rail.

The obligation to install the ETCS system on board the vehicles intended for the construction and maintenance of railway infrastructure is not necessary for those vehicles, which are not connected to the track. The ETCS system is not necessary for them to be in the above condition, e.g. for enabling the driver to install the ETCS system onboard the vehicle in the condition of the vehicle.

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The general risk management process according to Regulation (EU) 2017/383 will also be based on the ISO precedents and principles of the risk analysis. In this paper, implicitly, the ‘changes’ mentioned under 2.2.3.2 (2) for the ETSI Generic system should also be carried out according to the requirements of Regulation (EU) 2017/383. Why? We do not mention anymore the possibility in the TSI 203 period also under part 2.2.3.2 (1) SCC.

In terms of risk control, the moment ‘right’ risk is also shall be defined and managed per RU, not only those arising from

The discussion concerning the risk management processes - in Annexes B of Regulation 2017/383 - is a key to the system for managing and mitigating the risk involved with various train operations. However, the question of the CSM (2007/68/EC) ‘Type Approvals’ and ‘Authorisation’ to be taken into consideration. According to the provisions of the REG(TSO) (based on manufacturer’s Declaration of Conformity), the ETSI TSI should ensure that the following changes are harmonised with the ISO 203 period.

The question already been presented in this TSO for managing that kind of changes.

In the purely technical, it concerns the CSM within the EN 15261, it would be on the one hand a specific DB and the other hand on the other DB.

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### 111

#### 7.6.2.12 Ireland - 4.2.12 ETCS DMI

- The comments are noted.

- This comment was withdrawn by the author.

 NSA IE supports the Irish Rail proposal to remove this requirement on the basis that Irish Rail do not require the driver to enter the train running number on the ETCS DMI. This will be either hard coded in the EVC and display facilities) as well as any other TSI requirements for management of train running numbers, so that all new equipment shall remain also fully compatible with the interoperability requirements.

*Note: The comments are noted.*

### 112

#### 7.6.1.2

- The comments are noted.

### 113

#### 7.6.1.2

- The comments are noted.

### 114

#### 7.6.1.2 Ireland - 9.2.12 TSI CCS

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- The comments are noted.

### 115

#### 7.6.1.2

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- The comments are noted.

### 116

#### 7.6.1.2

- The comments are noted.
For the reasons set out in section 1, it is mandatory to keep clauses 6.1.1.3 and 6.4.3.

The proposal regulations on retroactivity and harmonisation of the target systems. They violate the requirement of certainty (2) and are also incompatible with the right to freedom to conduct a business under Art. 18 CFR (12).

Section 7.2.5

The proposal regulations on retroactivity and harmonisation of the target systems. They violate the requirement of certainty (2) and are also incompatible with the right to freedom to conduct a business under Art. 18 CFR (12).

The proposal regulations on retroactivity and harmonisation of the target systems. They violate the requirement of certainty (2) and are also incompatible with the right to freedom to conduct a business under Art. 18 CFR (12).
The following passage means that locomotives assigned to a yard are considered to be on-board systems? This does not seem to be appropriate to us. 

“Shall be fully assessed according with Commission Implementing Regulation (EU) No 402/2013, even regarding functional, performance and interfaces for which this TSI does not include specific mandatory requirements for interoperability.”

There is no reference in Reg 402/2013 to a vehicle equipped with both Class A and Class B systems to enable operation on several lines. As underlined, it is advisable to clarify: “the update of EC Subsystem verification, following modification of an already integrated IC due to specifications maintenance, will not require...”

The intention is to cover all possible parameter range that can be considered to be "unaffected". The meaning of the sentence is that if all the changes have no impact on the key aspects of the functional behavior, the configuration will not be considered as "modified".

A vehicle equipped with both Class A and Class B shall demonstrate technical compatibility with trackside Class A as if Class A is not equipped with Class B. A vehicle equipped with Class B is in addition to Class A shall not be required for the compatibility of a vehicle with lines where Class A is installed in parallel with Class B.

The removal of a Condition for Use may also lead to the need of a new authorisation, for example, removing the restriction of not interoperating in ETCS. Therefore it has been considered that the current wording was not appropriate and deleted.

The proposal would not be in contradiction with ETSI specifications. It is up to the trackside to define the level priority for which interfaced (ETS-1 or 4ETS) is the priority one. In other words, trackside in order to switch to ETCS, with 100% traffic in trackside, an ETSI equipped vehicle shall switch to ETCS for a vehicle only equipped with ETCS. The proposal wording was not appropiat and deleted.

There are some apertures in the TSI which are not yet addressed (e.g., EDL 45-47 in ETCS Conceptual). This sentence was initially proposed by Trending and Waldergroup from the ETM Stakeholder group. It was required as a result of Annex B “ETCS Conceptual” and the detailed description to be included in the implementor guide.

The intention is to cover all possible parameter range that can be considered to be "unaffected". The meaning of the sentence is that if all the changes have no impact on the key aspects of the functional behavior, the configuration will not be considered as "modified".

The proposal wording was not appropriate and deleted.

So the paragraph should be reworded.

What is a "configuration"?

Do we need different configurations here? 

If, for example, changes have been proposed to the "same IC", if this is possible to modify that a key or more parameter compatibility is not affected, without repeating at least some ESC tests (and applying reg 402/2013). This paragraph should be reworded.

The proposal wording was not appropriate and deleted.

What is it possible to say that modifying a key or more parameter compatibility is not affected, without repeating at least some ESC tests (and applying reg 402/2013)?

Probably its advisable to reword it saying ("it is possible to modify that a key or more parameter compatibility is not affected, without repeating at least some ESC tests (and applying reg 402/2013)").

The proposal wording was not appropriate and deleted.

The intention is to cover all possible parameter range that can be considered to be "unaffected". The meaning of the sentence is that if all the changes have no impact on the key aspects of the functional behavior, the configuration will not be considered as "modified".

The intention is to cover all possible parameter range that can be considered to be "unaffected".

The proposal wording was not appropriate and deleted.

The intention is to cover all possible parameter range that can be considered to be "unaffected". The meaning of the sentence is that if all the changes have no impact on the key aspects of the functional behavior, the configuration will not be considered as "modified".
The text is not clear and difficult to understand. It seems to be discussing various technical specifications and regulations related to the implementation of ETCS (European Train Control System) and other railway systems. The text contains many references to paragraphs and annexes, indicating a complex and detailed regulatory framework. Further analysis would require a more precise and detailed understanding of the context and the specific requirements and regulations being discussed. It appears to be addressing issues related to the interoperability of railway systems, the assessment of safety, and the implementation of on-board and trackside systems. The text highlights the importance of ensuring that new subsystems are compatible with existing systems and that the implementation of new technologies is done in a regulated and standardized manner to avoid conflicts and ensure safety.
Appendix B - Table B3

The concept of “advanced stage of development” is introduced in the Directive and is referring to this definition. Table B3 refers to advanced stage of development as there are an indication in table B2 between design phase started/not started/production phase. Also the Directive does not define the nature “trackside authorisation” which could be based on generic ETCS trackside network requirements. Therefore, it is expected that these trackside projects based on an existing generic framework contract will be notified by the Member States as being trackside projects in advanced stage of development.

Appendix C2 and appendix C4

The template refers to IC, but the text says “the following subsystem”, moreover, ESC/RSC Types are mentioned, instead of ESC/RSC IC Types.

General comment

There appear to be so many changes which, perhaps not have been highlighted as changes.

We kindly request that ERA review draft documents and highlight all changes as it is likely that many reviewers may not have identified all changes. We would be grateful for another opportunity to comment when the draft TSIs have been progressed and items currently identified as “TBD”, etc. are included.

Observations – Many changes have been identified in the CCS TSI which were not marked as changes e.g.

- 2.2 – expansion of scope e.g. addition of point no. (5) automatic train operation; other edits to scope e.g. RMR, FRMCS.

- 4.2.4.3.2 – added

- 4.2.6.2 added

- 4.2.6.2.1 added

- 4.2.6.2.2 added

- 4.2.6.2.3 added

- 4.2.6.2.4 added

- 4.2.17.1 and 4.2.17.2 – expansion of text in existing points

- 4.2.18 added

- 4.2.19 added

- 4.2.20 added

- 4.2.20.1 added

- 4.2.20.2 added

- Table 7.1 – section 7.2.2. legacy systems – added

The above examples of unmarked changes to the text. As these were identified only through spot checking, we anticipate that there may be other unmarked changes / deletions.

Table A2 – many index version numbers have been left as ‘TBD’ i.e. no review comment can be provided where the change has not been specified.

Suggest that consultation should be repeated once more clarity exists about the changes proposed and all proposed changes are clearly marked.