ERTMS/ETCS
Failure Modes and Effects Analysis for Transmission System in Application Level 1
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Company	Technical Approval	Management approval
ALSTOM		
ANSALDO		
AZD		
BOMBARDIER		
CAF		
SIEMENS		
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1. MODIFICATION HISTORY

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0.0.2 - 27-Aug-01	all	Revised	S. Adomeit
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2.2.4 11-10-07		Administrative updates according to agreement in RAMS-meeting 2007:6	DARI
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		changed to EN 50159	
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2014-03-26
		Corrections:
		
		  - 5.2.3.5 and 5.2.3.6 "SR distance information from loop" added
		
		  - 5.2.3.7 "Default loop information" added
		
		Updates for B3 MR1:
		
		  - 5.2.3.8 "Data to be used by applications outside ERTMS/ETCS" added due to CR1155
			DARI

3.4.1 2014-04-15		Updated according to comments from Siemens	DARI
3.4.2 2014-04-16		Formal updates during RAMS-meeting	DARI
3.4.3 2014-05-08		Baseline 3 1st maintenance release version	DARI

2. TABLE OF CONTENTS

3. INTRODUCTION

3.1.1.1 The purpose of this study is to systematically evaluate and document the potential impact of a failure of each of the mandatory Interfaces of the Transmission System that occur at the boundary of the reference architecture. Each defined functional failure is assessed for its effects on the ETCS system and on train operation assuming that there are no other failures. The effects of each failure on train operation are assigned a severity category based upon the impact of such a failure on the safety of a passenger on the train.

3.1.1.2 Note that if some failures are noted as being a RAM issue only they are not developed further.

3.1.1.3 Note that there will be a separate document for each analysis and each Application Level. This will allow the level specific fault tree to refer to a unique set of FMEA's easing the problem of future modifications.

3.1.1.4 The analysis of the Transmission System interfaces has been carried out herein for Application Level 1.

3.1.1.5 The input documents used as a basis for this study are:
- UNISIG: Subset-077 v2.3.2 (Causal Analysis Process);
- UNISIG: Subset-026 v3.4.0 (System Requirements Specification);
- UNISIG: Subset-036 v3.0.0 (Eurobalise FFFIS);
- UNISIG: Subset-040 v3.3.0 (Dimensioning and Engineering Rules);
- UNISIG: Subset-041 v3.1.0 (Performance Requirements);
- UNISIG: Subset-044 v2.4.0 (Euroloop FFFIS);
- CENELEC: EN 50159

4.   SCOPE OF THE WORK

4.1.1.1   This FMEA considers a Transmission System defined according to EN 50159:

Safety related Transmission System

Safety related On-board transmission function	Non-trusted Transmission System	Safety related Track-side transmission function

Safety related On-board functions
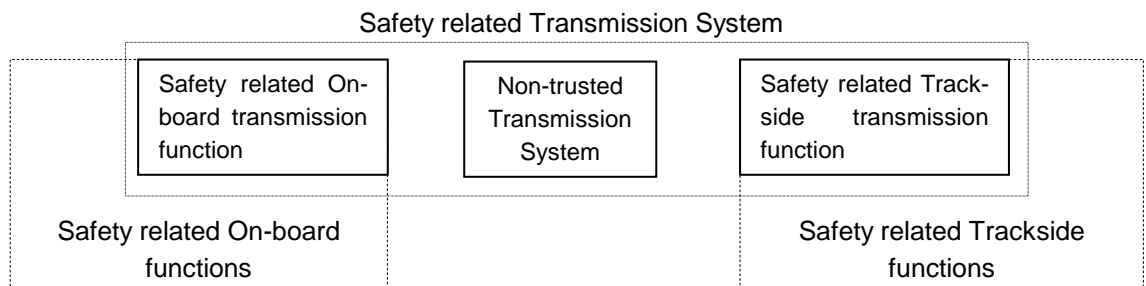
Safety related Trackside functions

Figure 1: Overview

4.1.1.2   Note: Definition of Transmission System according to EN 50159: A service used by the application to communicate message streams between a number of participants, who may be sources or sinks of information.

4.1.1.3   The reference architecture therefore consists of:
- the non-trusted transmission system
- the safety related transmission functions (transmission and access protection) and
- the safety related application functions.

4.1.1.4   Three physical transmission systems will be considered: Euroradio, Eurobalise and Euroloop.

4.1.1.5   The non-trusted transmission system for Eurobalise consists of:
- Eurobalise[1]
- Airgap
- Passive onboard antenna

Excluded are:
- LEU / telegram generation
- BTM functionality (onboard receiver, decoding etc.)

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[1] The Eurobalise is here regarded as a part of the non-trusted transmission channel. This refers to its role in the Corruption of messages.

4.1.1.6   The non-trusted transmission system for Euroloop consists of:

- Loop modem and cable

- Airgap

- Passive onboard antenna

Excluded are:

- LEU / telegram generation

- BTM functionality (onboard receiver, decoding etc.)

4.1.1.7   The safety related functions (both transmission and protection related) will be carried out by the safety related ETCS onboard and trackside equipment (LEU) and the engineering process.

4.1.1.8   Threats to the safety related equipment (e.g. ETCS trackside and ETCS onboard) and thus to the safety related transmission functions are not considered here.

4.1.1.9   Only failure causes within the non-trusted transmission channel (equipment and air gap) and the corresponding threats (Please refer to 5.1.1.8) are therefore considered.

4.1.1.10   Note: The failure causes external to the non-trusted transmission system will not be detailed in the table but still apply to all messages and will be indicated here only (see 5.2.1.2 to 5.2.1.5)

4.1.1.11   This analysis considers a non-trusted transmission system which is not fully specified, since the real interface between safety related equipment, which fulfils the safety related transmission functions, and the non-trusted transmission system depends on the implementation chosen by each manufacturer. The airgap however is considered as clearly defined.

5. FMEA

5.1 Assumptions

5.1.1.1 To simplify the FMEA it is assumed that each message during one hour shall contain all possible data ("track to train" or "train to track"), so that the necessary failure rate for each message is the same and independent from the application.

5.1.1.2 The failure effect of each data item is analysed separately, always considering the worst case scenario (typically catastrophic failure effect). No further analysis of specific data items and their failure effects is therefore necessary (Refer to example in the table).

5.1.1.3 Because the architecture and size of the non-trusted transmission system is not fully specified, the possible failure causes are more or less unknown, therefore the corresponding threats are considered.

5.1.1.4 Note: The real failure causes are more or less meaningless therefore in the table often "any failure of the non-trusted transmission system" is used.

5.1.1.5 The following threats will be considered: Repetition, Deletion, Insertion, Re-sequencing, Corruption, Delay and Masquerade (refer to EN 50159).

5.1.1.6 The identified severity is defined/assessed without System Protection or if the System Protection fails.

5.1.1.7 Most cases of threats to transmitted data are handled within the safety related transmission system which therefore prevents in most cases the transmission of incorrect data to the application.

5.1.1.8 Only in case where the safety related transmission functions are insufficient (e.g. regarding Deletion), further detailed analysis of causes and effects within the application is necessary.

5.1.1.9 The following safety services shall be considered: Message authenticity, Message integrity, Message timeliness and Message sequence (refer to EN 50159).

5.2 FMEA Table

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.1.1	Balise message (1 to 8 balise telegrams), Loop message, Radio message (Track to Train and Train to Track)	Track Description, Linking Information, MA data, Emergency messages, System data, Location data, Specific answers	Repetition, Deletion, Insertion, Resequence, Corruption, Delay, Masquerade	any failure of the non-trusted transmission system	level 1, all modes	t.b.d see below	t.b.d see below	t.b.d see below		catastrophic	t.b.d see below
5.2.1.2				any failure of safety related On-board transmission functions at source or sink of information (e.g. inside onboard kernel)						catastrophic	Design and Implementation process (Project or Product specific)
5.2.1.3				any failure of safety related Trackside transmission functions at source or sink of information (e.g. RBC kernel; inside LEU; or during Balise programming)						catastrophic	Design and Implementation process (Project or Product specific)

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.1.4				wrong Engineering data or wrong installation					Additional Engineering and Installation processes for project specific applications	catastrophic	Related Engineering and/or installation rules for Eurobalise transmission system must be respected (See Subset-040, Subset-036)
5.2.1.5				wrong route information at external interface (e.g. interlocking)					Project specific analysis	catastrophic	
5.2.1.6	Balise message (1 to 8 balise telegrams), Loop message, Radio message (Track to Train and Train to Track)	Telegrams (Data Items at lower level - means data items as a part of a message)	Repetition, Deletion, Insertion, Resequence, Corruption, Delay, Masquerade	any failure of the non-trusted transmission system	this is independent of level or mode	wrong information to onboard or to trackside	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	Definition of Telegrams, Messages and the Rules for Data Consistency and/or safety coding "Message integrity"

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.1	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data (possible content of all balise telegrams "track to train")	Repetition	any failure of the non-trusted transmission system, e.g. memory effects	level 1, all modes	misuse of information onboard see below	wrong speed or distance calculation see below	Exceedance of safe speed / distance by train see below		catastrophic	Linking of Balise Groups "Message sequence"
5.2.2.1 a)		MA Data				using of wrong MA (old MA)	wrong speed and/or distance calculated	Exceedance of safe speed / distance by train		catastrophic	
5.2.2.2		Track Description, Linking Information, MA data, System data		any failure of the non-trusted transmission system, e.g. memory effects	level 1, after start of mission SR --> FS	misuse of old information onboard e.g. old MA	leads to mode transition SR --> FS starting driving with an old authority	Exceedance of safe speed / distance by train		catastrophic	memorising of complete telegrams or messages must be excluded within the non-trusted transmission system

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Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.3	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data	**Deletion** (Deletion of the message, independent if a balise group itself is found or not)	any failure of the non-trusted transmission system, e.g. no TSR, no Stop if in SR etc. an other failure cause is systematic e.g. message rejected due to Data Consistency problems (please refer to SRS 3.16.2)	level 1, all modes	data not updated to train	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	Linking of Balise Groups "Message sequence"
5.2.2.3 a)	example:	System Data e.g. - National Values / Default Values - Specific system data (e.g. EOLM; NID_C)				using of wrong national values	wrong speed and/or distance calculated	Exceedance of safe speed / distance by train	Specific trackside applications should check if their national values are more restrictive from default ones given in SRS. Any train must be aware of such a restrictive values A proper layout configuration is required (transferred to Subset-113 ETCS-H0005)	catastrophic	NID_C in case of inconsistencies default values will be used Linking of Balise Groups "Message sequence" Please refer to SRS 3.18.2.4/5

| Ref. Id | ETCS Macro Function (Transmission function are defined here by transmitted message) | Macro Function Data Item | Failure Mode / Threats | Failure Cause | Operation Mode | Failure Effects | | | System Protection / Mitigation /Barriers (external) | Severity | System Protection / Mitigation /Barriers (internal) |
						Local	Intermediate	Initial End Effect			
5.2.2.4				any failure of the non-trusted transmission system, e.g. no TSR, no Level transition, no Stop if in SR, train trip valid for one direction only, level transition (please refer to SRS 3.6.3.1.4.1 etc.	level 1: FS, OS, SR, LS;	data not updated to train or no reaction	wrong speed or distance calculation	Exceedance of safe speed / distance by train / missing level transition	high availability of Balise group messages (e.g. only balise groups with more than one balise) Additional operational Rules e.g. if a level transition from level 0 to level 1 is deleted, the driver is fully responsible not to enter the ETCS area similar as for an non equipped train)Driver responsibility under degraded modes such as SR, UN, SH, etc.	catastrophic	Duplication of unlinked balise groups (Subset026) Installation rules for: • Eurobalise on track (Subset040/Cp.4.1.1) • Passive antenna onboard (Subset040/Cp.4.1.1 & Subset036)

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.5	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data	Insertion, Resequence	any failure of the non-trusted transmission system (cross talk, memory effects) (regarding memory effects please refer to "Repetition")	level 1, all modes	misuse or wrong information onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	memorising of complete telegrams or messages must be excluded within the non-trusted transmission system Linking of Balise Groups "Message sequence"
5.2.2.6		Track Description, Linking Information, MA data, System data Repositioning information in particular (please refer to SRS 3.4.2.2.2)		any failure of the non-trusted transmission system (cross talk, memory effects)	level 1, after start of mission SR --> FS and if Reposi-tioning is used(linking is not available or is not applied)	using of a wrong MA; update of repositioning distances or linking data are wrong	leads to mode transition SR --> FS starting driving with an old authority; wrong speed or distance calculation	Exceedance of safe speed / distance by train	apply balise groups with more than one balise "Message authenticity"	catastrophic	Eurobalise transmission has been designed to feature intrinsic safety against cross talk. Installation rules for: • Eurobalise on track (Subset040/Cp.4.1.1) • Passive antenna onboard (Subset040/Cp.4.1.1) Cross-talk protection requirements. (Subset036/Cp4.2.5) Integrity requirements for cross-talk in Subset-091 (ETCS_TR05, ETCS_OB08).

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Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.6 a)	example:	Track Description e.g. International SSP(Level Transition order - International SSP - TSR and revocation - Axle Load Speed Profile - Gradients - Track conditions - Route suitability data - Reversing area information - Text Messages - Geographical position - Data used by application outside ETCS - Changed adhesion factor)				using of wrong SSP	wrong MRSP calculation	Exceedance of safe speed by train		catastrophic	
5.2.2.7	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data	Corruption	any failure of the non-trusted transmission system	level 1, all modes	wrong information to onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	safety coding "Message integrity" Coding requirements in Subset036 - Cp.4.3

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Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.7 a)	example:	Linking Information e.g. - Linking - Assignment of co-ordinate system - Repositioning information)				using of wrong linking distances	wrong distance to EOA calculated	Exceedance of safe distance by train		catastrophic	
5.2.2.8	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data	Delay	any failure of the non-trusted transmission system (e.g. onboard delay, "Delay" may be dangerous in case of emergency situations when immediate braking is required.)	level 1, all modes	wrong location reference	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	memorizing of complete telegrams or messages must be excluded within the non-trusted transmission system Linking of balise groups. Expectation window for the balise group may be reached before the message is received from non-trusted part System Performances (Subset_041/Requirement 5.2.1.1"response times", the non-trusted transmission part also contributes to this performance). (transferred to the definition of the applicable KERNEL-events in Subset-091 chapter 12)

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.2.9	Balise message (1 to 8 balise telegrams)	Track Description, Linking Information, MA data, System data	Masquerade								Not taken into account as balise transmission system is a closed transmission system

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Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.3.1	Loop message	Infill information: Track Description, Linking Information, MA data, System data	Repetition, Insertion, Resequence	any failure of the non-trusted transmission system, e.g. cross talk; memory effects	level 1, infill FS	misuse of information onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	Clear identification of the message (infill location reference) Linking of Balise Groups "Message sequence" memorising of complete telegrams or messages must be excluded within the non-trusted transmission system Safety cross-talk prevention: • OBU checks that the Loop identification announced in the EOLM packet matches with loop identification of Euroloop messages received (Subset-044/5.4.6.3.1.4). • Minimum distance between loop sections with the same Q_SSCODE to avoid cross-talk effects on adjacent tracks. (Subset-040/4.1.3)

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Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.3.2	Loop message	Infill information: Track Description, Linking Information, MA data, System data	Deletion, Delay	any failure of the non-trusted transmision system	level 1, infill FS and no Signals (in case Signals exists, no problem because infill is optional)	no information	wrong decision by the driver	Passing EOA	specific operational rules for the driver to proceed (assumption: infill location reference balise group is available)	RAM issue	ETCS has no responsibility
5.2.3.3	Loop message	Infill information: Track Description, Linking Information, MA data, System data	Corruption	any failure of the non-trusted transmision system	level 1, infill FS	wrong information to onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	safety coding "Message integrity" Euroloop uses the same Eurobalise Coding strategy. (Subset036/Cp.4.3)
5.2.3.4	Loop message	Infill information: Track Description, Linking Information, MA data, System data	Masquerade		all Level						Not taken into account as loop transmission system is a closed transmission system

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.3.5	Loop message	Non-infill information: - SR distance information from loop	Deletion, Delay, Corruption	any failure of the non-trusted transmission system	SR	wrong information to onboard (the correct SR distance is not supervised)	train tripped at restrictive starter signal instead of before	the danger point can be passed	The 'SR distance information from loop' is a barrier to the driver erroneously passing a restrictive starter signal which has a short overlap. However, the barrier is quite weak because: 1) The supervision doesn't consider the distance confidence interval or gradient. 2) The supervision function is not even available in several cases: a) There is a point in the loop area (no uniquely defined route possible). b) The ETCS-OB doesn't have a valid position. c) The ETCS-OB doesn't have an LRBG. Therefore, additional measures need to be in place to guarantee that this doesn't happen. The safety shall not rely on the loop information alone.	catastrophic	For Corruption: safety coding, "Message integrity" Euroloop uses the same Eurobalise Coding strategy. (Subset036/Cp.4.3) For Deletion, Delay: none

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.3.6			Repetition, Insertion, Resequence	any failure of the non-trusted transmission system, e.g. cross talk; memory effects	level 1, infill FS	misuse of information onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	Clear identification of the message (reference balise group known as LRBG) "Message sequence" memorising of complete telegrams or messages must be excluded within the non-trusted transmission system Safety cross-talk prevention: • OBU checks that the Loop identification announced in the EOLM packet matches with loop identification of Euroloop messages received (Subset-044/5.4.6.3.1.4). Minimum distance between loop sections with the same Q_SSCODE to avoid cross-talk effects on adjacent tracks. (Subset-040/4.1.3)
5.2.3.7		Non-infill information: - Default Loop information	any	any failure of the non-trusted transmission system	any	No operational impact	No operational impact	No operational impact		none	

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.3.8		Non-infill information: - Data to be used by applications outside ERTMS/ETCS	any	any failure of the non-trusted transmission system	any	application specific	application specific	application specific	application specific The consequences are not related tot he ETCS Core Hazard. As worst case, the severity ‚catastrohic' is assigned.	catastrophic	For Corruption, Repetition, Insertion and Resequence, there are safety measures, see e.g. 5.2.3.5 and 5.2.3.6. For Deletion and Delay, there are no safety measures.

Ref. Id	ETCS Macro Function (Transmission function are defined here by transmitted message)	Macro Function Data Item	Failure Mode / Threats	Failure Cause	Operation Mode	Failure Effects			System Protection / Mitigation /Barriers (external)	Severity	System Protection / Mitigation /Barriers (internal)
						Local	Intermediate	Initial End Effect			
5.2.4.1	Radio message (Track to Train)	Track Description, Linking Information, MA data, System data,	Repetition, Insertion, Resequence Deletion, Delay, Corruption	any failure of the non-trusted transmission system	level 1, infill FS	Please refer to corresponding Loop message	Please refer to corresponding Loop message	Please refer to corresponding Loop message			Please refer to corresponding Loop message
5.2.4.2	Radio message (Track to Train)	Track Description, Linking Information, MA data, System data,	Masquerade	any failure of the non-trusted transmission system	level 1, infill FS	wrong information to onboard	wrong speed or distance calculation	Exceedance of safe speed / distance by train		catastrophic	Cryptographic techniques (Key management) "Message authenticity"
5.2.5.1	Radio message (Train to Track)	System Data Location Data	Repetition, Insertion, Resequence Deletion, Delay, Corruption Masquerade	any failure of the non-trusted transmission system	level 1, infill FS	Wrong information to Radio infill unit	Wrong infill information to onboard	Handled like Failure of track to train Message Please refer to 5.2.4.1			

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6. TRACEABILITY

6.1.1.1   This section lists the mandatory functions analysed from Subset-026.

6.1.1.2   Regarding the definition of a Transmission system according EN 50159 these functions therefore consists of safety related and non-safety related transmission functions.

6.1.1.3   The following level 1 main functions are analysed:
   - Transmit movement authorities and track description data to the train (Please refer to Subset-026 2.6.5.2.2)
   - Reception of movement authority and track description related to the transmitting balise (Please refer to Subset-026 2.6.5.2.4).

6.1.1.4   The following groups of transmission functions for level 1 are analysed:
   - Balise transmission functions (Please refer to Subset-026 3.4; 3.6.3.1; 3.16.1/2; 3.17.3; 8.4.2)
   - Loop transmission functions (Please refer to Subset-026 3.8.4.6, 3.9.2, 3.16.1, 8.4.3)
   - Radio transmission functions (Please refer to Subset-026 3.5; 3.8.4.6, 3.9.3, 3.16.1/3; 8.4.4)

7. CONCLUSIONS

7.1.1.1   Any issues found in this analysis have been transferred to the appropriate sections in SUBSET-091 and/or -113.