Introduction

Since the publication of the TSI CCS with Regulation (EU) 2016/919 and amended by Regulations (EU) 2019/776 and (EU) 2020/387, EIM has actively supported ERA and DG MOVE in the drafting of the TSI CCS revision as part of the "Digital Rail and Green Freight TSI revision package 2022"

EIM WG ERTMS Position and Comments
on the draft TSI CCS published for consultation on 18ᵗʰ March 2022

EIM is of the clear view that the proposed TSI CCS 2022 brings benefit for the EU Railway sector as a whole.

Therefore, EIM would like to confirm its support for the proposed TSI CCS revision as part of the "Digital Rail and Green Freight TSI revision package 2022" (hereafter: "TSI CCS 2022") with some remarks.

More specifically:
- Management of error corrections
  EIM supports the mandatory updates for error correction management. In fact, EIM believes the proposals are currently in some cases ambitious but are in reality conservative. As a next step, the necessary technological conditions should be created to shorten time scales while keeping the same level of quality and reduction of effort for the sector.
- Trackside and on-board deployment requirement
  EIM is pleased to see the introduction of stricter on-board implementation requirements. This will facilitate the migration to ERTMS operation trackside and enable the decommissioning of Class B systems.
- ESC/RSC
  EIM welcomes the clarifications and enhancements to the process.
- Merger L2/L3
  EIM supports this change as it simplifies the specifications and will bring the step to fixed virtual blocks or moving block deployment closer.
- Single set of specifications
  EIM recognises this is as a positive change which is essential to facilitate mature management of specifications in the future. EIM will support ERA in the ongoing work on the details of this change so that there is no impact on the infrastructure in operation. The migration from current specification framework to the single set of specification should be seamless for infrastructure in operation.
- FRMCS
  EIM welcomes this first step taken towards FRMCS deployment. In fact, EIM is disappointed that more detail could not be included at this stage to facilitate future migration.
- ATO
  EIM welcomes the introduction of harmonised ATO GoA1/2 specifications enabling increased energy efficiency and capacity enhancements to be introduced on ERTMS networks whilst protecting interoperability.
- Migration framework
  EIM welcomes a clear migration framework for the implementation of new major functions in infrastructure and on-board such as ATO and FRMCS. However, the necessary technological conditions should be created to have more ambitious time scales in the framework. The current proposal enables migration after a minimum of 7 years which for this kind of technology and compared with the EU ambition for digitalisation of rail, is much too long. In addition, the proposed migration framework actually blocks the trackside introduction of "GPRS" for ETCS data communication and "ATO" since it offers no migration path for vehicles in operation. EIM strongly requests to modify this to support a swift and successful roll-out of ERTMS across Europe.

- Enhancements:
  The updated ERTMS specifications which will be released with this TSI CSS bring some new functionality which increases the benefits of ERTMS. One of them is to make the implementation of "Cold Movement Detection" (CMD) mandatory for new vehicles. EIM regrets that ERA has refused so far to make CMD also mandatory for vehicles which are for the first time retrofitted with ERTMS. Since there are substantial operational benefits and EIM has cost figures showing that there are minor costs, EIM strongly requests ERA to extent the CMD requirement to vehicles which are for the first time fitted with ERTMS.

Although the TSI CCS 2022 brings important benefits to the sector, further developments in a next revision of the TSI CCS are necessary. Such work should include the following topics:

- It is essential that the specifications for FRMCS are completed and included in the next version of the TSI CCS to enable the introduction of FRMCS and the migration from GSM-R.
- Several enhancements were postponed and taken out of the scope of TSI CCS 2022 due to lack of resources. It is essential that the work to deliver these enhancements is restarted as including such further enhancements will bring benefits to the sector.
- Further work and evaluation on time scales for "error correction" and "enhancements" should be undertaken. The sector needs to move processes from being specialised, bespoke and expensive to a status where corrections and enhancements are part of business as usual and updates are able to be introduced regularly and efficiently to speed up the digitalisation of rail.
- Measures should be introduced which support an industrialised implementation and life cycle management of ERTMS. This should include simplification of assessment and authorisation processes to support efficient and cost-effective implementation of ERTMS.

EIM remains fully committed to actively contribute to further evolution of the TSI CCS.

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