Comment on Draft Recommendation 006REC1078

From: EIM

EIM would like to use the public consultation period on the TSI SRT to raise specific question related to the following two areas of the TSI SRT:

Section 4.2.1.4: Fire detection in technical rooms
This specification applies to all tunnels of more than 1 km in length. (a) Fires in technical rooms shall be detected in order to alert the infrastructure manager in case of fire.

Section 2.4 (e): Definition of "technical room":
2.4 (e) Technical rooms: Technical rooms are enclosed spaces with doors for access/egress inside or outside the tunnel with safety installations which are necessary for at least one of the following functions: self-rescue, evacuation, emergency communication, rescue and fire fighting, signalling and communication equipment, and traction power supply.

EIM wishes to raise the following points:

1. EIM wishes to understand better the meaning of 2.4 (e) "**safety installation** which are necessary for at least one of the following functions: self-rescue, evacuation, emergency communication, rescue and fire fighting, signalling and communication equipment, and traction power supply."

2. EIM would like clarity for what constitutes as a technical room **2.4 (e)**. Cabinets/enclosures in the tunnel seem not to be included in the definition of technical room ("with doors for access/egress"), despite this they may contain one or several of the mentioned safety functions/installations. The result is that no fire detection is needed to protect these functions/installations.

3. Why does the TSI SRT requires fire detection in technical rooms **(4.2.1.4)** when there is no such requirements outside technical rooms. What about the 'Safety installations' for the functions named in **2.4 (e)** that are placed in the tunnel but outside the technical rooms?
   a) EIM would like to know why the risk and the requirement for fire detection is different depending on the installation's location?
   b) Is the reliability of the fire detection different depending on the location?
   c) Is the cost for fire detection different depending on location?