



QUESTION / CLARIFICATION

CO-ORDINATION BETWEEN NOTIFIED BODIES
 INTEROPERABILITY DIRECTIVE AND SUBSEQUENT
 AMENDMENTS
 ON THE INTEROPERABILITY OF THE RAIL SYSTEM WITHIN
 THE UNION

QC-INF-020

Issue 02
 Date 18/10/2017
 Page 1 of 2

TITLE																						
PRM TSI DEFICIENCIES																						
ORIGINATOR	SUBJECT RELATED TO																					
VUZ	PRM TSI 1300/2014																					
DESCRIPTION AND BACKGROUND EXPLANATION																						
<p><u>Background</u> Table 3 “Categories of basic parameters”</p> <p>The following deficiencies are found in table 3 of PRM TSI 1300/2014:</p> <ol style="list-style-type: none"> 1. the Basic Parameter Title is missing at rows 3 and 5; 2. no clear reference to Section 4 of this TIS is found in the ‘Functional requirements only’ column for the basic parameters “Platform width and edge of platform” (row 12), “End of platform” (row 14) and “Passenger track level crossing at stations” (row 15). 																						
SUGGESTED RESOLUTION / INTERPRETATION																						
<p>See the proposed modified contents in table 3 here under for the rows 3, 5, 12, 14 and 15:</p> <p style="text-align: center;">Table 3 Categories of basic parameters</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 33%;">Basic Parameter</th> <th style="width: 33%;">Technical details provided</th> <th style="width: 33%;">Functional requirement only</th> </tr> </thead> <tbody> <tr> <td rowspan="2" style="text-align: center;">Doors and entrances</td> <td style="text-align: center;">4.2.1.3 (2): Door width</td> <td style="text-align: center;">4.2.1.3 (1)</td> </tr> <tr> <td style="text-align: center;">4.2.1.3 (4): Height of door operating device</td> <td style="text-align: center;">4.2.1.3 (3)</td> </tr> <tr> <td style="text-align: center;">Highlighting of transparent obstacles</td> <td></td> <td style="text-align: center;">Complete point 4.2.1.5</td> </tr> <tr> <td style="text-align: center;">Platform width and edge of platform</td> <td style="text-align: center;">4.2.1.12 (2) to (5) & (7) only width of visual marking</td> <td style="text-align: center;">4.2.1.12 (1), 4.2.1.12 (6), 4.2.1.12 (7), 4.2.1.12 (8), 4.2.1.12 (9)</td> </tr> <tr> <td style="text-align: center;">End of platform</td> <td style="text-align: center;">4.2.1.13</td> <td style="text-align: center;">4.2.1.13</td> </tr> <tr> <td style="text-align: center;">Passenger track level crossing at stations</td> <td style="text-align: center;">4.2.1.15 (2) & (4)</td> <td style="text-align: center;">4.2.1.15 (1), 4.2.1.15 (3)</td> </tr> </tbody> </table>			Basic Parameter	Technical details provided	Functional requirement only	Doors and entrances	4.2.1.3 (2): Door width	4.2.1.3 (1)	4.2.1.3 (4): Height of door operating device	4.2.1.3 (3)	Highlighting of transparent obstacles		Complete point 4.2.1.5	Platform width and edge of platform	4.2.1.12 (2) to (5) & (7) only width of visual marking	4.2.1.12 (1), 4.2.1.12 (6), 4.2.1.12 (7), 4.2.1.12 (8), 4.2.1.12 (9)	End of platform	4.2.1.13	4.2.1.13	Passenger track level crossing at stations	4.2.1.15 (2) & (4)	4.2.1.15 (1), 4.2.1.15 (3)
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Passenger track level crossing at stations	4.2.1.15 (2) & (4)	4.2.1.15 (1), 4.2.1.15 (3)																				
ORGANISATION(S) REQUESTED TO RESPOND (E.G. TSI GROUP, RISC, ERA ETC.)																						
EUROPEAN COMMISSION, ERA																						



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Page 2 of 2

DATE OF AGREEMENT AT NB RAIL PLENARY MEETING

PLE 051, 18/10/2017

RESPONSE FROM ORGANISATION ABOVE

ERA-OPI-2017-1

Disclaimer: ERA TO always supersedes NB-Rail suggested solution in case of difference.

Making the railway system
work better for society.

OPINION

ERA/OPI/2017-1

OF THE EUROPEAN UNION AGENCY FOR RAILWAYS

for

European Commission

regarding

PRM TSI deficiencies

Disclaimer:

The present document is a non-legally binding opinion of the European Union Agency for Railways. It does not represent the view of other EU institutions and bodies, and is without prejudice to the decision-making processes foreseen by the applicable EU legislation. Furthermore, a binding interpretation of EU law is the sole competence of the Court of Justice of the European Union.

1. General Context

1. In its letter referenced as MOVE.ddg2.c.4(2017)1572398 and dated on 13 April 2014 addressed to the European Union Agency for Railways, the European Commission requested the Agency to prepare a technical opinion regarding the Question/Clarification request numbered QC-INF-13 put forward by [the Infrastructure subgroup of] NB-Rail.
2. This question is relating to deficiencies found in the Annex to Commission Regulation (EU) No 1300/2014 of 18 November 2014 on the technical specifications for interoperability relating to accessibility of the Union's rail system for persons with disabilities and persons with reduced mobility¹ ("PRM TSI"). The Commission's request and the NB-Rail question can be found in Annex 1 to this opinion.
3. NB-Rail found deficiencies in the table 3 of the PRM TSI, in particular in that:
 - a. the Basic Parameter Title is missing at rows 3 and 5;
 - b. no clear reference to Section 4 of the TIS is found in the 'Functional requirements only' column for the basic parameters "Platform width and edge of platform" (row 12), "End of platform" (row 14) and "Passenger track level crossing at stations" (row 15).

2. Legal Background

1. In consideration of Regulation (EU) 2016/796 of the European Parliament and of the Council of 11 May 2016 on the European Union Agency for Railways and repealing Regulation (EC) No 881/2004² (Agency Regulation), Article 19 states that *"the Agency shall: (d) issue opinions which constitute acceptable means of compliance concerning deficiencies in TSIs, in accordance with Article 6(4) of Directive (EU) 2016/797³, and provide those opinions to the Commission;"* and Article 8 states that *"The Agency shall conduct an impact assessment of its recommendations and opinions"*
2. Article 6(4) of the Interoperability directive states that *"Any member of the network of representative bodies referred to in Article 38(4) of Regulation (EU) 2016/796 may make the Commission aware of possible TSI deficiencies"* and NB-Rail being such a member can make the Commission aware of TSI deficiencies.

3. Analysis

1. For the Infrastructure subsystem, the TSI PRM makes a difference between the basic parameters for which technically detailed requirements are provided and the basic parameters that are covered only

¹ OJ L 356, 12.12.2014, p. 110–178

² OJ L 138, 26.5.2016, p. 1.

³ Directive (EU) 2016/797 of the European Parliament and of the Council of 11 May 2016 on the interoperability of the rail system (Interoperability Directive), OJ L 138, 26.5.2016, p. 44.

by functional requirements. This differentiation aims at avoiding the creation of railway specific requirements where they are not necessary (e.g. design and quantity of accessible parking places, making of transparent doors).

2. The table 3 of the PRM TSI indicates to which the category belong each of the basic parameters. As remarked by NB-Rail, it contains several mistakes; the proposal from NB-Rail brings appropriate corrections to most of those mistakes.
3. The Agency only objects to the categorization of the basic parameters of point 4.2.1.15 proposed by NB-Rail: the four parameters form a consistent set and should not be divided in two different categories.
4. The opinion has been subject to an impact assessment, proportionate to the level of complexity of the deficiencies addressed (Annex 2 to this opinion).

4. The opinion

1. The Agency is of the opinion that there are deficiencies in the table 3 of the PRM TSI, as identified by NB-Rail.
2. The corrections proposed by the Agency in consideration of the NB-Rail proposal are highlighted in the corrected table below:

Table 3

Categories of basic parameters

Basic Parameter	Technical details provided	Functional requirement only
Parking facilities for persons with disabilities and persons with reduced mobility		Complete point 4.2.1.1
Obstacle-free route	Location of the routes Width of the obstacle-free route Threshold Double handrails Type of lift Height of braille signs	Detailed characteristics
Doors and entrances	4.2.1.3 (2): Door width 4.2.1.3 (4): Height of door operating device	4.2.1.3 (1) 4.2.1.3 (3)
Floor surfaces		Complete point 4.2.1.4
Highlighting of transparent obstacles		Complete point 4.2.1.5
Toilets and baby nappy changing facilities		Complete point 4.2.1.6
Furniture and free-standing devices		Complete point 4.2.1.7

Ticketing, Information desks and Customer Assistance points	4.2.1.8 (5): Passageway for ticket control machines	4.2.1.8 (1) — (4) 4.2.1.8 (6)
Lighting	4.2.1.9 (3): Lighting on platforms	4.2.1.9 (1), 4.2.1.9 (2), 4.2.1.9 (4): Lighting in other locations
Visual information: signposting, pictograms, printed or dynamic information	Detail of information to be provided Location of information	Detailed characteristics of visual information
Spoken information	Complete point 4.2.1.11	
Platform width and edge of platform	4.2.1.12 (2) to (5) 4.2.1.12 (6) to (9): presence of the items	4.2.1.12 (1) 4.2.1.12 (6) to (9): characteristics of contrast and of visual and tactile markings
End of platform	4.2.1.13: presence of the items	4.2.1.13: characteristics of contrast and of visual and tactile markings
Boarding aids stored on platforms	Complete point 4.2.1.14	
Passenger track level crossing at stations	Complete point 4.2.1.15	

3. As per Article 19 of the Agency Regulation, this opinion should constitute an acceptable mean of compliance concerning those deficiencies until the revision of the TSI PRM.

Valenciennes, 22 JUN 2017



Josef DOPPELBAUER
Executive Director