

1. PREAMBLE

The CER would like to thank the ERA for the professional and excellent work which has been done in the recent years to achieve the major objective to complete the ETCS Baseline 3 and the GSM-R Baseline 0 specifications. These achievements are crucial for the future success of ERTMS. Especially, the CER would like to highlight the excellent collaboration of the ERA ERTMS Unit on that matter.

2. SCOPE

The referred recommendation will introduce changes to the following ERTMS specifications:

- ETCS Baseline 2
- ETCS Baseline 3 (new)
- GSM-R Specifications, called Baseline 0 on-wards

3. ETCS BASELINE 2

The CER acknowledge the effort done by the ERA and associated experts. Hence, the CER support the recommended update of the specifications, especially the so called Annex III of Decision 2012/88/EU. Further, the CER has the opinion, that an additional line should be added in this Annex III as follows: Index N 34, A11T6001, (MORANE) Radio Transmission FFFIS for EuroRadio, Version 12.4

Baseline 2 (SRS 2.3.0d) on-board application

In order to protect taken investments and strategies for the ERTMS on-boards, the CER request to leave the Baseline 2 specifications (SRS 2.3.0d) in force as long as the market will demand and support this. The CER do not recognize any need to regulate the market behaviour on specification or legal level. Therefore, SRS 2.3.0d shall be kept in force for an un-specified lifetime.

Further, it has to be assured, that a vehicle equipped with a SRS 2.3.0d on-board, can be authorized and operated on a Baseline 2 track, which is designed and implemented according to the Baseline 3 specifications. This evidence shall be proved by 01/07/2013

4. ETCS BASELINE 3

The CER would like to underline its general support of the ETCS Baseline 3 specifications. Nevertheless, major issues are still missing and need a fast and comprehensive resolving in order to allow the CER to support of the mandatory Baseline 3 specifications without any restrictions. The following issues have been identified to be relevant for such an acceptance.

Test specifications

The Test specifications for Baseline 3 shall be delivered by ERA before the end of 2012, allowing a proper validation of it selves before 01/07/2013. This preconditions would allow an incorporation into the Baseline 3 specifications and therefore and update of Annex A of the TSI CCS, before the first products and systems will be available on the market.

Validation and completion of the Baseline 3 specifications

The validation and “quality improvement” of the Baseline 3 specifications is still on-going. The CER is asking ERA to take into account as soon as possible any found errors and return of experience from early applications. To level out early implementers investments, the Commission shall grant financial support to the harmed projects, in order to allow a proper implementation and to support interoperability. Further, the so called “disputed CR list”, especially CR 823, 756, 954, 890, 1065, shall be resolved within the same time frame as stated in 4.1.

Still missing Subsets for the complete Baseline 3 specifications (e.g. TIU FFFIS, RBC-RBC interface ...), shall be delivered by ERA before the end of 2012. Again, this preconditions would allow an incorporation into the Baseline 3 specifications and therefore and update of Annex A of the TSI CCS, before the first products and systems will be available on the market.

5. GSM-R BASELINE 0

The CER acknowledge the effort done by the Sector Organisations to align the GSM-R specifications resulting in the GSM-R Baseline 0 specifications. It is recognized, that the test specifications are still not yet included in this Baseline. Test specifications are crucial for proper and effective deployment of a system. The CER is therefore requesting the GSM-R test specifications to be delivered and incorporated in the GSM-R Baseline 0 specifications before the end of 2012, followed by a validation process to prove the usability.

6. NEW ERTMS MOU

The CER recognize, that most of the above mentioned constraints and activities, to support the recommendation of Baseline 3, are outlined in the upcoming, so called new ERTMS Memorandum of Understanding, to be signed on 16/04/2012. The CER request therefore, that this new ERTMS MoU is the base for the future development of the system especially regarding test and interface specifications as well as postponed CRs.

CER is fully committed to support ERA and associated experts, in the above requested actions, to achieve the expected objectives of ERTMS Baseline 3.

Disclaimer

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