Supported by NB-Rail Association

RECOMMENDATION FOR USE

NB-RAIL COORDINATION GROUP

Administrative Decision according to Interoperability Directive (EU) 2016/797 art. 30.6

Co-funded by the European Union

RFU-CCS-067	Issue 03 Date 18/03/2020

TITLE	
HANDLING OF SUBSET-076 TEST SEQUENCES AND RESULTS	
ORIGINATOR	**SUBJECT RELATED TO**
Belgorail, TÜV SÜD Nederland, Certifer, RINA	TSI CCS 2012/88/EU and (EU) 2016/919 §6.2.4.1 amended by Regulation (EU) 2019/776. SUBSET-076-5-2, SUBSET-076-6-3

AMENDMENT RECORD:

Issue 01: Creation on 05/10/2012

Issue 02: Amended on 21/10/2015 (aligned to the applicable CCS TSI)

Issue 03: Amended on 18/03/2020 (aligned to the applicable CCS TSI)

DESCRIPTION AND BACKGROUND EXPLANATION

Manufacturers of the Interoperability Constituent (IC)" ETCS on-board" expect to have problem with the application of section 6.2.4.1 of the CCS TSI 2016 amended by Regulation (EU) 2019/776.

Section 6.2.4.1 of the CCS TSI amended by Regulation (EU) 2019/776 requires that the Notified Body shall check that a specimen of the IC has passed the full set of mandatory test sequences referenced in Subset-076 and that these tests were carried out in an accredited laboratory[1].

Since the Subset-076 is very complex, it has been detected that some difficulties in the interpretation of the test results may raise during test campaigns and certification processes. This because the configurations/options used when creating test cases or test sequences may differ from those being implemented by a specific supplier, e.g. different parameter settings, optional SRS requirements, different interface implementation, etc. This difficulty is not originating from the Subset-076, but a consequence of the variety and range of options and configurations intentionally permitted by the specifications.

Although it is very much appreciated and acknowledged that in Subset-076, test sequences as well as the relevant test procedures have been extensively improved in the last years, residual test problems may still persist, e.g. due to divergent SRS interpretation.

[1] Accredited to carry out this type of tests in accordance with Regulation (EC) No 765/2008 of the European Parliament and of the Council of 9 July 2008 setting out the requirements for accreditation and market surveillance relating to the marketing of products and repealing Regulation (EEC) No 339/93 93 and the standards referred to in Annex A, Table A 4 (i.e. ISO/IEC 17025).

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Note: ERA is always ready to answer any issue regarding interpretation of SRS requirements.

The return of experience of the already carried out tests in accredited laboratories evidently shows that there are cases in which some specific test sequences are listed as not passed even if the corresponding requirements of Subset-026 are fulfilled by the ETCS On-Board.

A more exhaustive and commonly agreed assessment guide could be very useful. Therefore, NB-Rail has identified at least the need for a common approach to be applied by the notified members with regard to the following aspect:

1. Conduction of tests in an accredited laboratory;
2. Evaluation of not passed test sequences.

Note that according to chapter 6 of the CCS TSI (EU) 2016/919 amended by regulation (EU) 2019/776, the tests of Subset-076 are not the only verifications that need to be performed for demonstrating conformity of an IC “ETCS on-board”. E.g. the safety verification and validation process (RAMS aspect / table 6.1) is another important step in the process. Where referenced in the CCS TSI, other types of tests are requested, e.g. transmission and protocol tests, assessment of time and position accuracy performances, tests for safety proof, realistic test scenarios, etc... This in turn may enable to evaluate the errors that are found whilst conducting Subset-076 and define appropriate corrective actions.

In any case the Notified Bodies are asked to contribute actively to the continuous improvement of the test procedures and relevant facilities by collecting and sharing experience at the level of NB-Rail and sharing them with the Agency.

RFU PROPOSAL

1. <u>Conduction of tests in an accredited laboratory</u>

Regardless of whether module CB or CH1 is chosen, the Notified Body shall check that a specimen of the interoperability constituent (or group enclosing it) has passed the full set of mandatory test sequences and that these tests were carried out in an accredited laboratory.
If the tests were not carried out in an accredited laboratory as required by section 6.2.4.1 of the CCS TSI (EU) 2016/919 amended by regulation (EU) 2019/776, the Notified Body shall refuse to issue a certificate.

In case of changes or modification to an already tested/certified IC “ETCS on- board”, regression tests performed by the accredited laboratory are necessary. It is not mandatory to repeat all the TSs in case of an update of the IC as long as the set of

specifications against the IC is certified (Annex A) is not changed.
In case a certification according to a different set of specification (Annex A) is required, it is mandatory to execute a complete Subset-076 test campaign in a laboratory, accredited for the specific tests.
The extent of regression testing can be defined by the NoBo (module CB) or the applicant in collaboration with the accredited laboratory (module CH1) but shall always be agreed and acknowledged by the Notified Body before conduction.

2. The 'non-passed' tests

The accredited laboratory is in charge to classify all steps of all the sequences belonging to Subset-076 as passed or non-passed. The non-passed steps of the test sequences shall first be analysed by the applicant and the outcome assessed by NoBo.
In any case, for the evaluation of the overall test results, Subset-026 shall prevail over any other subset, including the test specification itself. Therefore, it remains the duty of the Notified Body to perform final evaluation of non-passed test cases keeping this general principle in case of any deviation or contradiction.
The final evaluation by the Notified Body may lead to the identification of complementary tests to be performed (by the applicant or the accredited laboratory) in order to get ultimate evidence of conformity, in particular for the functions not demonstrated compliant by conducting the tests sequences in the accredited laboratory, but by supplemental test or alternative verification results.

THIS RFU WAS AGREED ON
PLENARY MEETING 58
THIS RFU ENTERS INTO FORCE ON
18/03/2020 (DATE OF PUBLICATION) FROM THIS DATE ON THIS RFU CAN BE APPLIED INSTEAD OF THE PREVIOUS MANDATORY VERSION.
RFU APPLICATION IS MANDATORY STARTING FROM
18/03/2020 AT THIS DATE ANY PREVIOUS VERSIONS OF THIS RFU WILL BE WITHDRAWN. RFUS SHALL BE APPLIED BY ALL NOBOS. PLEASE REFER TO RFU-STR-702, CHAPTER 3 OF THE SECTION "DESCRIPTION AND BACKGROUND EXPLANATION", FOR THE LEGAL BASIS SUPPORTING THIS OBLIGATION.
ERA COMMENTS
PLENARY MEETING 58 – 19/02/2020: NO COMMENTS