



QUESTION / CLARIFICATION

CO-ORDINATION BETWEEN NOTIFIED BODIES

INTEROPERABILITY DIRECTIVE AND SUBSEQUENT
AMENDMENTS ON THE INTEROPERABILITY OF THE RAIL
SYSTEM WITHIN THE UNION

QC-RST-021

Issue 01

Date 18/05/2017

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TITLE

GAUGING REQUIREMENTS IN TSI PRM (MOVABLE STEPS)

ORIGINATOR

TÜV SÜD NEDERLAND B.V.

SUBJECT RELATED TO

TSI PRM (Reg. (EU) 1300/2014)
(also TSI PRM (2008/164/EC))
TSI LOC&PAS (Reg. (EU) 1302/2014)

DESCRIPTION AND BACKGROUND EXPLANATION

References

- [1] TSI PRM (Reg. (EU) 1300/2014)
- [2] TSI LOC&PAS (Reg. (EU) 1302/2014)

Scope

Section 4.2.2.12.1. "Movable step and bridging plate" related to gauging in the TSI PRM [1], in contrast to TSI LOC&PAS [2].

Introduction

The objective of the TSI PRM [1] is "to enhance the accessibility of rail transport to persons with disabilities and persons with reduced mobility" (section 1).

TSI PRM section 4.2.2.12 "Boarding aids" contains the following requirement, related to gauging and immobilising the train:

4.2.2.12.1. Movable step and bridging plate

(3) "In the case of the movable step or bridging plate extending beyond that permitted by the gauging rules, the train shall be immobilised whilst the step or plate is extended."

TSI LOC&PAS [2] contains numerous requirements in respect to gauging and immobilising a train (traction cut-off, emergency brake).

However, TSI LOC&PAS does not require anything related to gauging limit exceedance by movable steps, bridging plates or other moveable parts.



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Problem

TSI PRM section 4.2.2.12.1 (3) in [1] stands out from the other TSI PRM requirements in the following sense:

- It exceeds the range of assessment related to persons with disabilities or reduced mobility – a movable step or bridging plate outside of the gauging profile may cause hazard to the vehicle, the platform and infrastructure and even the passengers on the platform, regardless whether or not they are in the scope of the TSI PRM.
- It is related to gauging, which is a TSI LOC&PAS topic.
- The requirement “the train shall be immobilised” relates to traction cut-off and emergency brake, which is also clearly a TSI LOC&PAS topic.

Requirement TSI PRM 4.2.2.12.1 (3) forces the NoBo to assess a major part of the safety measures related to the movable step / bridging plate and the traction cut-off / emergency brake, which even includes assessment of multiple operation, general operation etc. Considering a typical TSI PRM assessment, with the focus on persons with disabilities or reduced mobility, this seems totally out of scope. In addition, the safety assessment methods related to traction cut-off and emergency brake are defined in TSI LOC&PAS, not in TSI PRM.

Especially in cases where the NoBo contract only covers assessment against TSI PRM (e.g. if a manufacturer contracts different NoBos for the various TSIs), requirement 4.2.2.12.1 (3) causes difficulties and possibly high and unforeseen effort in terms of

- Technical competence of the TSI PRM assessor;
- Misunderstandings between manufacturer and NoBo in terms of
 - Foreseeable effort;
 - Which evidence documents need to be provided (e.g. Risk Assessment for failure modes of the movable step);
 - Whether Risk Assessment will be checked during assessment of TSI PRM and again during assessment of TSI LOC&PAS;
 - What the examination needs to cover (e.g. multiple operation);
- Misunderstandings between manufacturer and the NSA;
- Unexpected delay of the project.

This is not in the sense of the ‘EC’ verification concept, which explicitly allows easy contracting of various NoBos within the same project.



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SUGGESTED RESOLUTION / INTERPRETATION

NB-Rail makes the following suggestion.

Remove requirement 4.2.2.12.1 (3) from the TSI PRM and add it to the TSI LOC&PAS (maybe in a more general formulation that also covers other moveable parts of the vehicle where the same problem can occur).

ORGANISATION(S) REQUESTED TO RESPOND

TSI WORKING PARTY, EUAR

DATE OF AGREEMENT AT NB RAIL PLENARY MEETING

PLE050, 18/05/2017

RESPONSE FROM ORGANISATION ABOVE

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