

## Questions and Comments – Utkast til forskrift om nasjonale tekniske krav til jernbanekjøretøy

### Questions:

- Can the applicant make an application for more than one authorization at a time? For example, request authorization for transport and testing in the same application?
- Is the response time from SJT still 4 weeks from the date of application?

### Comments:

- For the authorisations Chapters 2-4, Can SJT please provide updated guidance on exactly what should be included in each of the applications for authorization. For example, some applications for authorization require risk assessments or confirmation of compatibility (authorization for transport), but it is unclear as to what the extent of information shall be provided.
- Previous authorization processes only allow for approval of a Radio Remote Control(RRC) system after the Operator has provided a risk assessment for using the RRC in their organization and within their safety management system. However, for vehicle owner/leasing companies, it would be beneficial to be able to test and commission the RRC and to obtain technical approval for the RRC without the risk assessment from the operator. Can SJT please consider such an option, as is possible in Sweden.
- National requirements which are satisfied by TSI's are not really NTRs (or at least not for new vehicles which conform to the TSIs). Can we propose SJT considers making an additional Regulation document just for new vehicles built in accordance with the TSIs and which only includes the NTRs (national requirements which cannot be fulfilled by TSI's)?
- Chapter 4, Section 10, paragraph 3 - *Testspesifikasjonene skal aksepteres av infrastrukturforvalter*. We suggest this requirement is duplication of the requirements within TSI CCS, for example ESC tests requirements, and this requirement is also assessed and confirmed via the third-parties NoBo and DeBo. This requirement could result in further complications between the onboard supplier and infrastructure manager if there is a disagreement. Also, if this requirement is to remain, what shall constitute fulfillment? Does the applicant have to obtain writing confirmation from the infrastructure manager, and what if infrastructure manager refuses out of disagreement?
- Chapter 4, Section 10, paragraph 3 and 4, Further to our previous comment for paragraph 3. We suggest that paragraph 3 and 4 are only applicable for Class B conformity. Class A conformity process is defined by TSI CCS.
- Chapter 4, Section 10, paragraph 5, The requirement/request for the documentation listed in the four points is often at an immature state at the point of application, and therefore may be of limited value. We also see this as a challenge regarding the project timeline for the development of an onboard system and associated documentation vs the timeline for the application and its evaluation within SJT. For example, if the onboard supplier has to submit the application to early in advance of testing, the documentation may not be available.
- Chapter 4, Section 10, paragraph 5, Point 1 *EF-verifiseringserklæring med tilhørende sertifikater eller midlertidige sertifikater og dokumentasjon for de delsystemene i kjøretøyet som er omfattet av TSI-er*, and Point 2 *Verifiseringserklæring med tilhørende sertifikater eller midlertidige sertifikater og dokumentasjon for samsvar med de relevante nasjonale tekniske krav*. An EC-declaration or even an ISV will not be available for a newly installed ETCS/STM onboard subsystem, or at least not at the start of testing. An ISV could of course be provided after commissioning and the initial round of closed track testing. The ISV at the time of application may be of limited value, especially considering such an ISV would only related to the onboard subsystem modification, and assuming the vehicle itself already conforms to the European and/or national requirements.

- Chapter 4, Section 10, paragraph 5, Point 4 - *Sikkerhetsvurderingsrapport som bekrefter tilfredsstillende nivå for sikker integrering mellom kjøretøyet og det norske jernbanesystemet iht CSM RA*. We also see this requirement has limited value at the time of application. The onboard subsystem supplier could provide information regarding the system design and integration into the vehicle, but this point cannot be sufficiently confirmed until after testing has been performed. Again, we also assume this would only related to the onboard subsystem modification, and assuming the vehicle itself already conforms to the European and/or national requirements.
- Vedlegg, 1 Dokumentasjon, 1.1 Generell dokumentasjon, last sentence – can SJT please define what an 'older vehicle,' and what is required in the 'risk assessment?' Shall the risk assessment be for taking the vehicle into service in the Norwegian network?
- Vedlegg, 12.2.2 Krav til STM, First sentence – We see the reference to the website as problematic. The reference does not state where on SJT's site. Also, it is difficult to fix the requirements for a given project when it is unclear if or when the requirements are changed on the website. Preference would be to list the requirements on the website in the legislation. In part of Vedlegg, Section 12.
- Referring to the website – STM-regleverk, We understand the following document listed on the website will no longer be valid in Sweden following the implementation of the fourth railway package (note this document was developed by the Swedish NSA): *Vägledning ATC installationer i fordon, dok nr 411 b2, version 01, 2008-04-18*. Will this document continue to be a requirement in Norway after the implementation of the fourth railway package?