Certification and authorisation
Questions from Tales and Bombardier

Tales: *czy w trakcie fazowania, poszczególne fazy, które są oddawane do eksploatacji powinny przechodzić cały proces certyfikacji? Zaznaczam, że takich faz w projekcie jest dużo i certyfikowanie każdej z nich będzie miało wpływ na czas realizacji oraz koszt całego projektu. Jeżeli jest inaczej gdzie jest to zapisane.*

During phasing, are all the phases that are put into service, obliged to pass the entire certification process? I note that there are really many phases of the project and certifying each of them will have an impact on the execution time and the cost of the entire project. If not, where is it written?

Not completely clear what is meant with phases. ERA assumptions: Trackside project, line sections will be placed in service step by step.

Each section authorised to be placed in service need the corresponding Certificates.

Bombardier*: Certyfikaty częściowe – czy pomimo wymagania na pełną zgodność ze specyfikacją 2.3.0d, Klient może nie uznawać składników interoperacyjności dla których wydano certyfikat częściowy (wynikły z niespełnienia niektórych wymagań SRS, które jednak nie mają wpływu na funkcjonalność danej aplikacji)?*

Partial certificates – are there any reasonable arguments to refuse of partial certificates for IOP Constituents that don't fulfill some SRS 2.3.0d requirements that are not relevant for specific application/project?

It is not explicitly written in the Interoperability Directive that a certificate with restrictions (Certificate of partial conformity) can be given for an IC (and ISV's are only intended for Subsystems), but this should be possible too.

Chapter 6.4.3 of the TSI CCS 2012 states that such a certificate could be given for an IC. In the ERA advice ERA/A DV/2013-6 regarding the clarification of section 6.4 of the CCS TSI the following is stated:

"6.4.2. Partial conformity of Control-Command and Signalling Subsystems due to limited application of the TSI.

Under the conditions specified in the Railway Interoperability Directive and the Commission Decision 2010/713/EU, a certificate of verification may be issued for a subsystem that has not been assessed for full conformity with all relevant TSIs, provided the certificate gives precise reference to the TSIs or their parts whose conformity has been assessed and those whose conformity has not been assessed.

This corresponds to the situation where some function, interface or performance has not been implemented in an interoperability constituent the use of which is therefore restricted to some specific conditions: a certificate of conformity for such an interoperability constituent may be issued only if:

1. **the non implemented function, interface or performance is not required for integrating the interoperability constituent into a subsystem because of specific conditions of use, …."**

A certificate for such an IC with ("restricted") conditions of use is therefore possible.

Please be aware that it is up to the MS to accept such certificates and that there is an EC process behind.

Ostrożnie z tym pytaniem i przykładem dla balisy. W wymaganiach Subset-036 v.2.4.1 jest:
5.7.1 Operational Temperature

The Balise should fulfil one of the classes of sub-clause 4.3 (Temperature) of EN 50125-3.
a w rozdziale 4.3 tejże normy jest zapisane tak:

For deviations from the temperatures shown in Table 2, the customer shall specify the temperature levels required.
Dlatego go nie tłumaczę.
EN 50125-3 is not mandatory. It is up to the customer to define the appropriate temperature levels.

Czy w trakcie oceny podsystemu przez Jednostkę Notyfikowaną, Jednostka ta sprawdza również interfejsy (ujęte jako część podsystemu Sterowanie – pkt. 2.1 w TSI CCS), w tym m.in.:
a.   Interfejs do urządzeń stacyjnych,
b.   Interfejs do systemu DSAT,
c.   Interfejs do systemów klasy B (np. do RADIOSTOP).
Czy ocenie podlegają funkcje oraz bezpieczeństwo interfejsów? Czy w przypadku przeprowadzenia takiej oceny, Zamawiający może wymagać dodatkowej oceny/badań przeprowadzonych przez Jednostkę Upoważnioną oraz przeprowadzenia własnego dopuszczenia (na podstawie systemu SMS) dla przedmiotowych interfejsów?
Is it meant that in course of subsystem EC Verification the NoBo verifies interfaces as well (as part of CCS – par. 2.1 in TSI CCS), including:

a. interface to interlocking systems

b. interface to hot box detection

c. interface to class B systems (eg. Radiostop)

Does conformity assessment comprise functionality and safety of interfaces? In case of such an assessment can the customer require industry to perform additionally an assessment / tests by DeBo and approval of such interfaces according to their own procedures (based on SMS)?
In regard to SMS, Richard Lockett already explained the responsibilities and rules
General information:
In case CCS is integrated in a vehicle, the NoBo has to verify:
- **Integration RS – CCS onboard (SS with other SS)**
- **Integration RS – CCS onboard (Interfaces)**
- **Integration CCS onboard with the generic network characteristic**

In case CCS is integrated in a trackside, the NoBo has to verify:
- **Integration Infrasructure – CCS trackside (SS with other SS)**
- **Integration Infastructure – CCS trackside (Interfaces)**
- **Technical compatibility with an certified RS**

The Interfaces specified in the TSI have to be verified by the NoBo on Subsystem level. For the interfaces to the national part (e.g. interlocking) it has to be verified that the functionality of the Subsystem is ensured.
   To a: The interface to the interlocking should ensure the functionality of ETCS trackside
   To b: Outside the scope of ERTMS (requirements in TSI RS)
   To d:

- **When the STM interface is used, verification of the interface.**
- **Stand-alone class B system; transition to be ensured, no exported constrains on ETCS**

Jaki jest czas oczekiwania na przeprowadzenie procesu certyfikacji, a dokładniej: jak zostanie rozwiązany problem konieczności przeprowadzenia procesu certyfikacji dla 450 przejazdów, w momencie kiedy data zakończenia kontraktu to 2015 r. (W. Filarski)

What is the time of execution of the certification process? To specify: how the problem of necessity of certification for 450 LX systems will be solved assuming that the end of the Contract is scheduled in 2015?

LX are not specified in the TSI CCS (there are some ETCS functionality and OPE rules useful for stand alone LX specified). Like interlocking, LX are actually outside the scope of the TSI and therefore it is up to the MS what he require for placing in service. As LX and interlocking are part of the CCS trackside subsystem, the essential requirements (e.g. safety) have to be fulfilled.

In general, the certification process is an interaction between customer and NoBo/DeBo. There is no time limit for the certification process specified on EC level.

Podczas realizacji kontraktu przez Wykonawcę obowiązuje stan ustawodawstwa oraz norm na dzień składania oferty lub podpisania umowy -> jak podejść do przypadku, gdy w czasie realizacji kontraktu następuje konieczność dokonania certyfikacji krajowej lub europejskiej dla urządzenia. Czy Wykonawca może wymagać od Jednostki Notyfikownaej/Upoważnionej i UTK dokonania certyfikacji na podstawie starych norm/przepisów?

While the implementation of the Contract, the Contractor is obliged to obey legal acts and norms valid on a day when the Contract Agreement is signed or on a day when the offer is submitted.

The obligations of the contractor are normally based on what is written in the contract.

In this case, how we should behave when during the contract realization there is a necessity of conducting the European or national process of certification for device. **?????** Is the Contrator allowed to require from the Notified Body/ Designated Body and UTK to conduct the process of certification on the basis of old norms and laws?

The final target of a project is to get in operation. When authorising for placing in service, the TSI and the NNTR actual in force should be applied. Nevertheless the MS can accept an an earlier version (Art.9: Derogation).

Jaka jest ścieżka dopuszczenia pojazdu kolejowego po zabudowie systemu ERTMS dla pojazdu niezgodnego z TSI w zakresie LOC&PAS. Czy dołożenie systemu ERTMS powoduje zmianę typu lokomotywy, a tym samym konieczność uzyskiwania nowego świadectwa typu? (MI)

What is the procedure for authorization of the vehicle after ERTMS installation (retrofit), when the vehicle doesn't fulfill TSI LOC&PAS? Does addition of ERTMS cause change of vehicle type, so also a new vehicle type certification?

Yes, the vehicle type changes. Normally only the modifications (CCS) should be checked but it seems that some MS take the chance to ask conformity with all other relevant TSI actually in force. Detailed explanation will be given in DV 29bis.

Jak należy certyfikować lokomotywę z zabudowanym systemem ETCS na infrastrukturze (ETCS wayside), która nie posiada jeszcze certyfikatu (przykład z E30, gdzie mamy certyfikować lokomotywy na linii z zabudowanymi przytorowymi urządzeniami ETCS, które nie posiada certyfikatu końcowego, a częścią uzyskiwania tegoż certyfikatu są testy z udziałem tejże lokomotywy). (MI)

How should the locomotive with ERTMS be verified on the infrastructure that is not yet EC Verified? Case of E30 pilot project.

Question not clear.

The loco has to be certified according to the existing law, but the certification is not connected to any specific infrastructure.