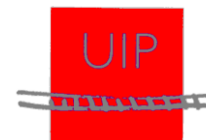


POSITION PAPER on a European Strategy for an Efficient Exchange of Rolling Stock Data in Rail Freight

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INTRODUCTION

UIP generally supports the goals expressed by the European Commission concerning the development of a Single European Railway Area, especially removing administrative and technical barriers and developing easy and common procedures at European level. This is particularly critical and important when it comes to the question of registers.

Following the work of the ERA Task Force on Telematics Applications and in parallel to the discussions on the TAF revision, it became evident that due to the existence of numerous registers for Rolling Stock, there is a need for a register architecture at European level. Most recently at the RISC66 held on January 23 and 24, 2013 in Brussels, Mr. Patrizio Grillo of DG MOVE reminded of the importance of the registers and invited the sector to consider alternative and best scenarios for each register.

UIP sees this as an opportune time to make public its views and recommendations on *“how operational databases such as RSRD² could fulfill the sector's needs for operational data and how such databases could interact with the registers”* (as mentioned in DV61EN01 – Recommendation 5, presented and discussed at RISC63).

In the following position paper, UIP presents a recommendation for an efficient, low-cost solution to registers dedicated to Rolling Stock Data. This Position Paper is addressed to the European Commission with the aim to have it taken into account in the preparation of the new ERA Working Party on vehicle registers which is to be launched in September 2013.

The Dual Approach

In the railway sector there is a demand for up-to-date freight wagon information. RUs need technical, administrative and maintenance data for train preparation and operation as well as safety checks. Keepers and their ECMs require wagon performance data and defect/damage information from RUs to assure correct maintenance. A certain set of up-to-date vehicle data needs to be regularly exchanged between Wagon Keepers/Maintainers and companies using the vehicles.

There are two sources for such data defined in the European legislation:

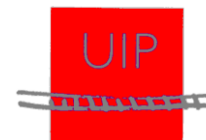
- Different decisions on registers, and
- TAF TSI (Rolling Stock Reference Database).

Both sources should be seen as being complementary to each other. UIP strongly supports such dual approach to Registers and TAF TSI (RSRD). All data exchange related activities are focused and aligned to such approach.

This paper is meant to express clearly UIP's current thinking and can serve to establish similarly interlinking profiles for other market participants.

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The Role of the Authorities

The Authorities are fulfilling an important role in the establishment and enforcement of certification/authorisation standards in order to ensure "SAFE OPERATION" in the context of railway operating processes. However, if Authorities were obliged to continuously update relevant wagon data for more than 600.000 freight wagons circulating on the European rail network and undergoing over 200.000 maintenance events every year, they will be burdened and overloaded.

Therefore, UIP proposes that the Authorities focus on the following:

- (1) Executing sovereign tasks, for example, to register and authorize wagons, monitor the certification of ECMs etc. and**
- (2) Establishing the pre-conditions that any market participant must fulfil in order to be a reliable (certified) partner in the performance of freight railway operations. That would include the definition of a set of wagon-related data fulfilling the demand of RUs for safe operation.**

The responsibilities of the sector participants and, with regard to freight vehicles, the Keepers and (its) ECMs include:

- Executing the established rules effectively,
- Establishing operating systems that secure fulfilment of these rules (in the sense of an integrated quality approach), and
- Conducting the business with due care.

Such logic implies that registers of Authorities (such as NVRs or ERATV) should only include a minimum set of data, which is directly linked to sovereign tasks. All other data should be exchanged via the TAF TSI. Therefore, UIP suggests analysing and streamlining the registers under the dual approach.

TAF TSI's Complementary Role to Registers

As part of the TAF TSI, RSRD – Rolling Stock Reference Database – was designed to make available a set of up-to-date administrative and technical data directly from the Keeper. UIP however, believes that a wider set of wagon design and administrative data (exceeding the proposed RSRD data content) shall be made available via RSRD. The justification is that such data will be subject to more frequent changes as vehicles undergo technical maintenance processes and potential modifications. Under such circumstances, the sole responsibility and data ownership for such more dynamic data sets shall be in the hands of the Keeper and his chosen ECM(s).

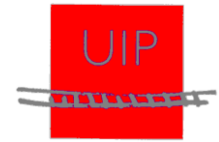
UIP strongly suggests establishing one central European RSRD instead of individual solutions by each Keeper. The benefits of one central solution are:

- (1) Economies of scale (share of development and operation costs)¹**

¹ The current operating cost of RSRD² for Keeper is in the range of € 2.- per car (based on 110,000 vehicles stored in RSRD²). If the fleet size was doubled within RSRD², the operating cost per vehicle for all Keepers would decline to € 1.00 per car per year.

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- (2) Standardised and consistent data set and formats**
- (3) Central interface regardless of data sources**
- (4) Common development and implementation**

The data content originally proposed to be held in RSRD according to the TAF TSI was rather "indicative" of the type of data that was needed and the operating processes that such data might be able to support to achieve the TAF TSI objectives. Hence, the data content shall be under continuous review in a joint sector effort. For UIP any available data that serve a meaningful and justified operational purpose can eventually be made available via RSRD to other participants.

UIP fully supports the target functionalities laid down in the TAF TSI and the anticipated enhancement in sector efficiency, service quality and reliability that can be achieved by a more flexible approach to Electronic Data Interchanges (EDI). Therefore, UIP recommends that as the market develops, a flexible decision-making structure is implemented to keep a mandatory data catalogue dynamic in nature and to allow for an open discussion on the data exchange requirements between the Keepers and their partners.

UIP is of the opinion that a RSRD solution is a vital ingredient of an open freight market development, and hence are supportive to a legislative framework obliging the Keepers to establish compatible databases or use one central database for open data exchange.

UIP's RSRD² approach

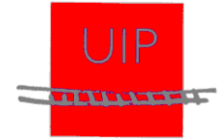
UIP has initiated the development of an efficient Data Exchange Software (RSRD²) which is already available in a first release version. While the impetus to develop RSRD² was driven by the legal obligation embedded in the TAF TSI, the delay of the sector to implement the TAF TSI tools in the original timeline has made RSRD² a front running solution today.

The RSRD² initiative is the first encouraging effort of UIP's Keeper community to solve jointly a common technical challenge at optimum cost/performance ratios. The Keepers see their initiative for open data exchange as serving the whole market and fully support the sharing of meaningful tools and putting them to service for other market participants such as Railway Undertakings (RUs), fleet managers/Keepers and ECMs, National Safety Authorities, workshops, users/shippers/loaders (in most cases the customers of the Keepers).

To guarantee full neutrality, RSRD² has been transferred to a Belgium non-for-profit association RSRD² asbl. As wider market acceptance is reached, this setting shall encourage the usage of RSRD² by all market participants and support a joint sector governance structure (similar to the GCU governance structure).

RSRD² allows for managing access rights for each Keeper's fleet per wagon and per user. UIP supports a simple logic of granting open access to any interested actor on a justified need-to-know basis as embedded in the functional profile of such actor and as laid down in the European regulatory/legal framework. UIP trusts that such logic is sufficient to fully protect the actors' commercial interests in confidential market information. RSRD² is fully multi-client capable and data is fully protected against unauthorised data access by other users, e.g. competitors.

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RSRD² fulfils all technical requirements set in the TAF TSI for RSRDs (e.g. operational availability, compatibility with common interface, standard system interface, 24/7 help desk etc.).

UIP does not see the need to maintain more than one "hot" database application for vehicle data exchange. UIP proposes to upload passive data contents from public registers into RSRD² to provide for a "one stop shop" solution for any data needs related to wagon operations. The RSRD² data set already includes most public register data fields. Although this is UIP's preferred path of the register discussion, UIP will support any chosen register architecture in which RSRD² can be implanted to achieve its full potential.

UIP pursues the development of RSRD² according to the following priorities:

- (1) Making RSRD² the best tool by user friendliness and operating reliability that supports the production/business processes of the Keepers, customers and railway operators 24/7.
- (2) Making available useful high quality data in a unified standard for as many freight wagons as possible.
- (3) Supporting the needs of safety authorities to validate collective technical properties in the market fleets as required to secure the safety of operations (either based on the investigations following incidents, or more abstractly in the pursuit of safety regulating concepts).
- (4) Providing solutions for specific data requirements as established by national or European regulations from time to time (e.g. mileage data for administration of NDTAC solutions etc).

The UIP Keepers view the RSRD² initiative as pragmatic, business oriented and independent from, but in full alignment with, legal obligations. UIP will continue its efforts in providing a contribution to the market participants towards a resolution of pressing market needs.

Wagon Performance Data

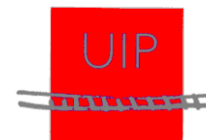
The Keepers' obligation to ensure good technical conditions of its vehicles in service requires regular feedback on the operating performance of the vehicles. Such performance data must be supplied by the operating RUs and be delivered in a defined standard that permits continuous tracing of vehicle performance over time and over complex geographical service patterns. In addition, high quality mileage data are also prerequisite for noise differentiated track access charges (NDTAC).

UIP attempted to carry out pilot studies to validate if current vehicle performance can be derived reliably from existing data sources in the hands of Infrastructure Managers (IMs) and Railway Undertakings (RUs). The intermediate results of these attempts are discouraging as most of the addressed IMs and RUs do not store the necessary data or are unable to make them available for the pilot studies.

It seems that the sector partners do not commit to support both, the Keepers and their ECMs to fulfil their legal obligations, and the sector safety agenda in delivering high quality vehicle performance data.

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Therefore, UIP strongly demands that the delivery of performance information in a standardised format and calculation method is set as a pre-condition to operating trains with freight cars.

CONCLUSIONS

A dual approach of Registers and the TAF TSI – Rolling Stock Reference Database (RSRD) to provide wagon data seems most appropriate for UIP. Data content of both approaches needs to be considered as a whole and adjusted accordingly.

The Keepers already made available a central RSRD² as a TAF TSI solution and have proven a fast and economic development and operation of such database. The existing solution is neutral, can easily be adapted to future developments and is open to all sector companies.

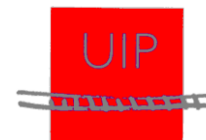
The availability of standardised vehicle performance data is of highest importance for the Keepers and their ECM(s). For UIP, the issue needs to be handled with the same relevance in the European discussions as the register development or the TAF TSI deployment. The Keepers are willing to provide leadership and insight in the required discussions.

In response to the explicit goal of the European Commission to include existing tools and market initiatives and solutions in the proposed framework of data exchange by a simple logic of avoiding the duplication of efforts and unnecessary costs, UIP will continue to lobby with the EC and ERA to assess the benefits of RSRD² in the light of the current discussion on the most appropriate future register architecture.

We are at your disposal and readily available to explain and justify our positions in more detail and answer any questions you may have.

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Founded in 1950, the UIP – International Union of Wagon Keepers, with its seat in Brussels, is the umbrella association of national associations from fourteen European countries, thus representing more than 250 keepers with approximately 180.000 freight wagons, performing 50 % of the rail freight tonne-kilometres throughout Europe. UIP represents the members' concerns at international level. By means of research, lobbying and focused cooperation with all stakeholders and organisations interested in rail freight transportation, the UIP wants to secure on the long term the future of rail freight transport. www.uiprail.org