



The Group of Representative Bodies (GRB)

European Commission

DG Move

Mr. Keir Fitch

Mrs. Michaela Strohschneider

European Union Agency for Railways

Mr. Josef Doppelbauer

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Route compatibility

Dear Sir or Madam,

The vehicle authorisation topic has been discussed intensively between the European Commission, the European Union Agency for Railways, the national safety authorities and the sector representatives and satisfying results have been achieved.

Before a Railway Undertaking can use a vehicle in the 'area of use', specified in its authorisation for placing on the market, it shall carry out "checks" according to Article 23 of the Interoperability Directive.

These "checks" have been subject of various discussions among the sector stakeholders and in the respective ERA working parties. The topic is indeed complex and requires clarification and an approach that ensures the sound implementation of the 4th Railway Package's Technical Pillar.

The Group of Representative Bodies (GRB) believes that the current description of the Route Compatibility assessment is not mature enough to be implemented and that various issues still need to be resolved. We believe that further discussions between the EC, the Agency and the sector stakeholders are needed in order to clarify the "checks" mentioned in Article 23 of the Interoperability Directive considering also the



Article 21 of the Interoperability Directive and to develop a big picture which takes into account various subsystems, roles & responsibilities and the operational aspects is necessary.

The Group of Representative Bodies (GRB) intends to provide a position paper soon to hopefully agree on an approach supported by the sector stakeholders. The intention of the 4th Railway Package's Technical Pillar is to facilitate the overall authorisation processes for vehicles and ensure a quick time to market/operations. We need to avoid the "use of vehicles" becoming a stumbling block.

Kind regards,

Andy Doherty
GRB chair