AERRL's Position Paper on ERTMS Deployment

AERRL, the Association of European Railway Rolling Stock Lessors, wants to reiterate its commitment to the objective of creating a unified Single European Railway Area (SERA). We believe that significant progress towards this objective can be achieved through the deployment of the European Rail Traffic Management System (ERTMS). This paper outlines AERRL's position on what we believe are the necessary steps and strategic priorities to achieve this goal, ensuring efficient, economic, reliable, and safe transportation of goods and passengers across Europe.

Core System Version

AERRL advocates for the establishment of a single, core ERTMS system version across the European Network. This would facilitate a coordinated roll-out between Infrastructure Managers (IMs) and onboard vehicles, ensuring long-term stability and maturity of the system while providing the necessary reassurances for private investments to flourish. The initial focus should be on creating a stable industry plateau, which consists of:

- A proven and available European Train Control System (ETCS) technology specification such as Baseline 3.4 = System Version (SV) 2.0.
- A fast and coordinated rollout of Future Railway Mobile Communication System (FRMCS) that is not dependent on the versions of ETCS higher than SV2.0.

Encouraging Innovation and reducing complexity

AERRL promotes innovation and is a pioneer in the field. We believe that to improve rail's attractiveness we need to speed up the progress of digitalizing the industry. ETCS and Automatic Train Operation (ATO) are the perfect examples of such Innovations. Nonetheless, the focus should always be on a pan-European scale with an elimination of the ever-increasing ETCS System Compatibility (ESC) types and the overcoming of National Technical Rules (NTR). If we keep allowing national peculiarities, we will not overcome a patchwork of national networks rather than achieve a truly European one. A more standardized and EU-wide system would also help with cost reduction thus allowing and encouraging much-needed private investment. Without this, we will not be able to reach the modal shift to rail objectives.

We believe that the most efficient way to ensure that these objectives are reached is the inclusion of AERRL's vision in future Technical Specifications for Interoperability (TSIs). In addition, such inclusion should ensure that on Rolling Stock the implementation of future developments (like ATO) is carried out on a voluntary and economically sound basis and keep on allowing vehicles with the Core Version (ETCS SV 2.0 and FRMCS) to operate the next decades without additional mandatory upgrades.

Key Objectives

As pointed out above, AERRL would like to stress the following points:

- **Synchronized Decommissioning of Class B Systems:** Transitioning from Class B systems to the ETCS SV 2.0 should be based on proven industrial capabilities and capacities, coordinated at an EU level.
  - We already have issues with the availability of subsequent ETCS revisions (i.e. SV 2.1) as technological advancement has not taken into account the time needed to upgrade/retrofit the already circulating approx. ten thousand locomotives on European Railroads.

- **Elimination of ESC Types:** Significantly reducing the number of ESC types would enable more standardization, thus leading to reduced implementation costs. The number of ESC types should be limited to one ESC type per ETCS Version.
- **Infrastructure Upgrades Commitment:** Clear commitment and rules for infrastructure upgrades to provide a fixed and firm target picture.
    - If IMs do not have constructive dialogues with Rolling Stock keepers, we run the risk of paralyzing the rail sector as the locomotives will not be compatible with the infrastructure. This has already proven true in Italy where locomotives at BL3.4 are not able to run on Infrastructure at BL3.6.
- **Transparent Communication:** Ensuring transparent communication with all vehicle owners for change requests.
- **Grandfather Rights:** Upholding grandfather rights for stable plateaus and securing investments in rolling stock.
- **Independent FRMCS Implementation:** Implementing FRMCS as soon as possible, independent of other ETCS functions.
    - FRMCS will be the basis for new innovative technologies and solutions. This is why it has to be implemented as fast as possible. We believe that decoupling FRMCS from ETCS would speed up this process.
- **Elimination of National Technical Rules (NTR):** Reducing national technical rules to zero would enable more standardization, thus leading to reduced implementation costs.
- **Long-term Roadmap:** Developing a long-term roadmap based on the new TEN-T regulation deadlines.
- **Limited Network Access Rules:** Ensuring compatibility with a significantly limited number of network access rules.
- **Cost-Benefit Comparative Impact Analysis (IA):** Future change requests should be implemented only after a comparative impact analysis, with approval from all stakeholders, and costs should be borne by those who benefit, not just those that are obliged to implement.
- **Subsidies Applied at Source:** Applying subsidies directly to the supply base to ensure costs to end users do not increase unnecessarily, preventing negative modal shifts.

Conclusion

To achieve the envisioned SERA, strong European-level coordination is essential. AERRL is committed to working towards these objectives to facilitate the efficient, economic, reliable, and safe transport of goods and passengers across Europe, ensuring that the ERTMS deployment is successful and beneficial for all stakeholders involved. We have always demonstrated our openness to dialogue with other stakeholders involved to ensure coordination with the different actors and would like to underline this again.