



Department
for Transport

[redacted]

Deputy Director
Rail Industry Standards and Capability
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Web site: www.gov.uk/dft

Your Ref:

01 June 2022

Dear [redacted]

**RE: THE RAILWAYS (INTEROPERABILITY) REGULATIONS 2011- REGULATION 14
DECISION FOR WESTERN STAGE B ETCS TRACKSIDE SUBSYSTEM**

Thank you for your letter of 20 January 2022 to my colleague, [redacted], applying for an exemption under Regulation 14 of the Railways (Interoperability) Regulations 2011 (RIR 2011) for the Stage B ETCS project between Paddington and Heathrow.

Regulation 14(2) (f) states that an exemption can be granted for cases where a project employs innovative solutions which either do not comply with the relevant NTSNs or to which the assessment methods in the specified NTSNs cannot be applied.

Your application states that the approved body has identified a perceived non-compliance with the Control, Command and Signalling NTSN, Subset 026-5 version 3.4.0, requirement section 5.10.3.10, specifically:

5.10.3.10.3 which states that when the train has passed the level transition border with its minimum safe rear end, i.e. when the whole train has left the level 2 and 3 area, the onboard equipment of the leading engine shall send a position report to the radio block centre.

5.10.3.10.4 which states that after receiving this exit position report, the radio block centre (RBC) can order the train to terminate the session (leading and non-leading engines).

I have noted the approved body's assessment of a non-compliance which refers to the exit transition design developed by Alstom, as the manufacturer of the signalling system. This sends the request for the disconnection of the session when the front of the train crosses the exit border instead of when the rear end of the train has exited the area. This prevents the onboard system from sending a position report to the RBC once the train has passed the level transition border as set out in 5.10.3.10.3, and the RBC consequently terminates the session before the position report is received, which is contrary to the requirements set out in 5.10.3.10.4.

You have proposed that the solution developed by Alstom should be considered as an innovative solution, which would only be appropriate to a Level 2 overlay system (where ETCS level 2 and conventional class B signalling exist on the same track). This innovative solution is only effective because there is train detection operating within Level 2. The deployment of this innovative solution shall be managed within Network Rail's safety management system.

DfT has considered your application in consultation with the ORR. My decision is that the exit transition designed developed by Alstom represents an “innovative solution” in place of applying, subset 026-5 version 3.4.0, requirement section 5.10.3.10 in full, and ORR have confirmed they do not consider there to be any safety risks with this alternative approach due to the presence of the train detection system. On that basis, it is the Competent Authority’s decision that the requested exemption is granted.

I am copying this letter to [redacted] at the ORR.

Yours sincerely,

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Deputy Director Rail Industry Standards and Capability