

**Independent Regulators' Group – Rail**

**IRG–Rail**

**Subgroup on Access to Service Facilities**

**Position Paper Regarding a Common Template for Service Facility  
Descriptions**

**May 18<sup>th</sup> 2018**

## **I. Purpose and background of the position paper**

1. Implementing Regulation (EU) 2017/2177 requires infrastructure managers (IM) to provide a common template for service facility descriptions (SFD) developed by the railway sector in cooperation with regulatory bodies. RailNetEurope (RNE) has developed such a template, discussed it with the market and published it on their website.
2. Service facility operators can provide the relevant, ready-to-be-published information on their facilities and services using the RNE- or any other template or form they wish to use. Templates can therefore be created or updated as necessary in order to facilitate the gathering of information and alleviate the administrative burden.
3. This position paper aims at providing some views on the proposed approach of RNE to a service facility common template and outline a possible way forward to enhance the visibility of the rail services.

## **II. Template**

4. We welcome the work carried out by RNE and are grateful to them for taking the task of developing the template for the whole railway sector. RNE efforts are a good and helpful first step towards a more transparent and open European service facility market. Nevertheless, we consider that in order to take the template to the next level and make it more practical for all users, there are some issues that should be addressed.
5. The very purpose of collecting and publishing information on service facilities and rail-related services is to help railway undertakings (RU) and other applicants to find information on services offered. The template should focus on being user-friendly. It should be clear, yet flexible enough so that it can be adopted by the large spectrum of facility and service providers that operate in the rail market.
6. The term “users” needs to be understood in the wide sense of the word. The template should facilitate tasks for:
  - the end users who need to effectively research the market and find suppliers,
  - the operators of service facilities (SFO) who may use the template, as well as
  - the IMs who will integrate or link information on services to their Network Statements.
7. Therefore, it is important that the template clearly meets the interests of all these different parties.

## **III. Structure**

8. The structure of RNEs template is principally derived from the RNE network statement. This means that the focus of the SFDs tends to be more on the facilities themselves rather than on the services supplied. While RNE somewhat reflects that difference in their template, IRG-Rail considers that it should be more pronounced. We therefore suggest the following structure to make it more user-friendly, more dynamic and more adaptable to the needs of the different parties that need to provide information:
  - general information

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- services and facilities
- access conditions and capacity allocation
- charges
- dynamic information (i.e. planned works)

**IV. Terms and Guidance**

9. It is paramount that all users of a template (such as the RNE template) have the same understanding of terms that are used. Clarity about the terms is needed to complete the SFDs as well as help users to search for the necessary information. Therefore, major terms such as “service facility”, “installation” and “relevance” need to be defined. Clarity is also fundamental for ensuring a harmonized application of the Implementing Regulation.
10. The template should be accompanied by some form of guidance that explains terms, what kind of information is required and in which way the template has to be completed. A link to common definitions should be provided in the general information section to make them clear to all users.
11. Taking into account developments like the common portal currently under preparation by the European Commission, the approach to the template, its clarity and comprehensiveness should facilitate the development of a data-centric system of SFDs.

**V. Next steps**

12. The main part of the implementing act applies from 1 June 2019. Thus, the network statements for the working timetable starting in December 2020 (Recital 19 of Implementing Regulation (EU) 2017/2177) are the first ones that need to incorporate the specific requirements of the Implementing Regulation. The deadline for supplying the SFD or a link to it to the IM depends on the IMs decision under Art. 5 (2) of the Implementing Regulation. In order to help SFOs we would recommend that IMs publish the template and their deadlines for submission of SFD-information in the network statement for the timetable starting in December 2019 or on their web portal by December 2018. That notwithstanding, SFOs are already under the obligation to supply information on access and charging for service facilities. They are free to use a template whenever they feel it is useful to them.
13. To strengthen the users' perspective and make use of experiences gained by stakeholders, IRG-Rail considers a revision of the template produced by RNE to be necessary. The updated template should align closely to the needs of all SFO and the railway undertakings. IRG-Rail will encourage that process by inviting this year all interested parties, SFO, railway undertakings and IMs, to share their views and propose ideas with the goal of promoting rail by enhancing the visibility of the rail services.