

IRG-Rail observations on TTR for Smart Capacity Management: a brief summary of previous TTR papers

Generally on TTR

1. In the ongoing impact assessment on cross-border rail, the European Commission has listed the TTR project as a notable existing stakeholder initiative which will be given due consideration when designing the policy options.¹
2. IRG-Rail has followed the TTR project for several years through active conversations with RNE and other stakeholders. IRG-Rail published reports on the development of TTR and its pilots in 2019², 2020³ and 2021⁴. The reports are available on the IRG-Rail website.⁵
3. IRG-Rail has consistently expressed support for innovation in the railway sector and for strengthening of the rail transport mode for the benefit of passengers and freight users. IRG-Rail has found that TTR is an innovative project to that effect and has welcomed the TTR process objectives.

Pilots and evaluation

4. IRG-Rail has followed the TTR Pilots closely, with several IRG-Rail members participating as observers on TTR Pilot Boards.
5. IRG-Rail considers that before deciding to introduce new mechanisms and further actions, TTR needs to be thoroughly tested and evaluated. A system-wide implementation can only follow after all critical components have been tested and evaluated during pilot operations. Any major change in the existing legal framework to implement TTR across the European rail network has to be evidence-based.
6. Regarding the TTR pilots, IRG-Rail has identified difficulties in evaluation. As the elements of TTR are not fully developed yet, the results from the pilots should be seen as a first step in assessing the viability of the TTR process.

Allocation process

7. In the 2021 report, IRG-Rail aimed at providing the regulatory bodies' perspective on unresolved key regulatory questions and challenges in the proposed TTR allocation process, especially with regard to the mechanisms for conflict resolution and ensuring transparency.
8. The proposed capacity model and capacity planning/supply process give a key role to the infrastructure managers (IMs) to shape the use of the railway infrastructure. In this planning, there will be a need for transparency and non-discrimination regarding the planning parameters used by IMs.

9. Capacity Needs Announcements (CNAs) would be the main means for applicants of influencing the capacity model and ensuring that their demand for capacity will be represented in the capacity supply. CNAs are a new element in the planning process which raises a number of potential regulatory issues concerning the risks of applicants exaggerating demand, keeping flexibility, and confidentiality of information.
10. In the TTR process, many of the capacity allocation issues which are currently resolved in the consultation and coordination stages of the Annual TimeTable under the rules in e.g. art. 45.3–4 and 46–47 of Directive 2012/34/EU will instead be dealt with during preplanning, in the capacity model and capacity supply stages. There will be a need for a clear, transparent and detailed framework for consultation, coordination and conflict resolution at each stage of the TTR process and not only during the allocation stage.
11. With planning and conflict resolution primarily taking place during advance planning, there may be a need for a clear role for Regulatory Bodies in monitoring non-discrimination, transparency and efficiency and dealing with appeals in all the different process steps.

Commercial conditions

12. On the basis of a review of reservation charges⁶, IRG-Rail in the 2020 report made a number of observations on the proposed Commercial Conditions intended to create incentives to avoid overbooking and unnecessary changes to the timetable.
13. IRG-Rail supports the harmonization of definitions of cancellation, modification, alteration, and non-usage.
14. Commercial Conditions need to strike a careful balance between on the one hand being high enough to create incentives and, on the other hand, not being so high as to push traffic off the rails, penalise innovation, or in other manners, decrease the competitiveness of the railway sector. Given the similarity of the suggested solution to current reservation charges which have not proven effective, it is uncertain whether the suggested charges will be sufficient to reach the objective of encouraging stakeholders to use the allocation process and capacity products as efficiently as possible. For the required effects to be achieved, it may be necessary to base the charges for the Commercial Conditions on predictions of behaviour rather than agreeing on a proportion of Track Access Charges.

¹ [International freight and passenger transport – increasing the share of rail traffic \(europa.eu\)](https://www.europa.eu)

² <https://www.irg-rail.eu/download/5/649/ReportonthestateofdevelopmentoftheTTRproject.pdf>

³ <https://www.irg-rail.eu/download/5/740/IRG-Rail204-ReportonthestateofdevelopmentoftheTTRprojectanditspilots.pdf>

⁴ <https://www.irg-rail.eu/download/5/858/IRG-Rail20213ReportontheStateofDevelopmentofTTR.pdf>

⁵ [Position Papers - IRG Rail \(irg-rail.eu\)](https://www.irg-rail.eu)

⁶ <https://www.irg-rail.eu/download/5/650/ReviewofReservationCharges.pdf>