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Working Party on Rail Transport

Group of Experts on the Permanent Identification of Railway Rolling Stock

Fourth session

Geneva, 13–14 September 2021 Item 2 (d) of the provisional agenda Development of the permanent marking of the Unique Rail Vehicle Identification System: Development of the framework

Feedback on Informal document SC.2/PIRRS No.1 (2021)

Submitted by secretariat

Feedback from the OTIF secretariat

A. General remarks

- 1. The OTIF Secretariat welcomes the initiative by the Russian Federation to submit informal document SC.2/PIRRS No. 1 (2021) entitled 'Model rules: according to the system of unique identification of rail vehicle' to the third session of the GE PIRRS, further referred to as 'the document'.
- 2. The OTIF Secretariat is of the view that section 1 ('General Provisions') of the document provides a good basis for recommendations and draft protocols.
- 3. The OTIF Secretariat is of the view that significant parts of sections 2, 3, 4, 5 and 7 of the document largely overlap with:
 - provisions already in place under the Luxembourg Protocol to the Cape Town Convention, or
 - part of the (Draft) Regulations for the International Registry (submitted for information as informal document SC.2/PIRRS No. 2 (2021)) as drafted by the Supervisory Authority in accordance with the Luxembourg Protocol to the Cape Town Convention, or
 - contractual relations to be agreed between the lessor and lessee.
- 4. Furthermore, the OTIF Secretariat is of the view that significant parts of sections 2, 3, 4, 5 and 7 of the document generally go beyond the remit of the GE PIRRS as set out in its terms of reference (Annex II to ECE/TRANS/2020/15).

5. The OTIF Secretariat therefore suggests omitting sections 2, 3, 4, 5 and 7 of the document, with the exceptions specified below in part B (Provisions for further consideration in the model rules), and with proposals in part C (Proposal for a structure for the model rules) that could be used as a layout for the model rules in order to avoid overlapping with the other documents already approved; the Luxembourg Protocol and the Draft Regulations for the International Registry.

B. Provisions for further consideration in the model rules

- 6. Notwithstanding the above, there are several elements in sections 2, 3, 4, 5 and 7 of the document which are relevant within the remit of the GE PIRRS and which it might therefore be useful to consider for inclusion in the recommendations and draft protocols. In particular, the OTIF Secretariat believes the following excerpts to be worth considering further:
 - "3.5. The borrower (lessee) under the agreement, having received an information certificate on the assignment of the number, within 60 days, applies the identification number to the rail vehicle by applying the number with paint or a metal plate with the URVIS number. Identification numbers are placed on the visible surface of the rail vehicle and must be duplicated on different sides of the rail vehicle. [...]";
 - "3.6. In the event that the URVIS number printed on the vehicle became unreadable during operation, or one of the URVIS number designations became unreadable, or if one of the metal plates is lost or damaged to the point of impossibility of reading, the borrower (lessee) under the agreement in within 10 days from the date of discovery, is obliged to fill in the missing information of the URVIS number, or to restore the metal plate with the URVIS number.";
 - "4.5. The lessee and / or sub-lessee, unless otherwise stipulated by the credit (leasing) agreement, having received an information certificate on the assignment of the number, within 60 days, applies the identification number to the rail vehicle by applying the number with paint or a metal plate with the URVIS number. Identification numbers are placed on the visible surface of the rail vehicle and must be duplicated on different sides of the rail vehicle. [...]";
 - "4.6. In the event that the URVIS number printed on the vehicle became unreadable during operation, or one of the URVIS number designations became unreadable, or if one of the metal plates is lost or damaged to the point of impossibility of reading, the lessee and / or sub-lessee, if otherwise is not stipulated by the credit (leasing) agreement, within 10 days from the date of discovery, is obliged to fill in the missing information of the URVIS number, or to restore the metal plate with the URVIS number.";
 - "5.6. The plant, having received an information certificate on the number of URVIS, within 10 days applies the identification number to the rail vehicle by applying the number with paint or a metal plate. Identification numbers must be placed on the visible surface of the rail vehicle and must be duplicated on different sides of the rail vehicle. The plant that received the number URVIS is not entitled to issue a contract of sale through credit (leasing) funds before applying (refills or restoration) of the number URVIS on rail vehicles. [...]";
 - "5.7. If the URVIS number, printed on the vehicle, during operation by the borrower (lessee) under the contract has become unreadable, or one of the designations of the URVIS number has become unreadable, or if one of the metal plates is lost, the borrower (lessee) under the contract in within 10 days from the date of discovery, is obliged to fill in the missing information of the URVIS number, or to restore the lost metal plate with the URVIS number."

C. Proposal for a structure for the model rules

- 7. The documents listed below have already been adopted or signed:
 - the Luxembourg Protocol to the Cape Town Convention;
 - the (Draft) Regulations for the International Registry (submitted for information as informal document SC.2/PIRRS No. 2 (2021)).
- 8. However, a number of key questions, such as the marking of the railway rolling stock, require additional clarification, taking into account the industry practice and the various national procedures in this area, so that model rules applicable to all types of relevant railway rolling stock can be implemented.
- 9. The OTIF Secretariat would like to propose the structure below in order to cover the key items identified in the terms of reference of the GE PIRRS and to take account of the discussions and input from the various experts at previous meetings of the GE PIRRS.

1. General provisions

- 10. This section would include at least an introduction to the URVIS number, a description of the aim, definitions of common terms used in the document, and information on the applicability of the model rules and the railway rolling stock concerned.
- 11. Section 1 'General Provisions' of the document submitted by the Russian Federation provides a good basis for recommendations and draft protocols.

2. Structure of URVIS identifier

12. This section would clarify the number of digits and what the digits refer to.

3. Specifications for affixing the URVIS number

- 13. This section would lay down the specifications for affixing the URVIS number to rolling stock. The document submitted by the Russian Federation provides a good basis for further discussion on the responsibilities of the stakeholders and the deadline for marking railway rolling stock.
- 14. In addition, the OTIF Secretariat would like to propose that the following criteria be clearly described in the Regulations:
 - Material properties of number plate and its fixing (welding, gluing, bolting);
 - Method of marking the URVIS number (e.g. stamping, engraving, painting);
 - Required text markings in addition to the URVIS number;
 - Position(s) of the marking(s) on the railway rolling stock;
 - Size and font of the URVIS number and additional markings.

4. Dispute management

15. This section would specify the rules applicable in case of non-compliance with the model rules.

5. Revision clause

16. This section would specify the competences for future revision of the model rules, in order to take account of technological progress.