

## Italy Template for National Implementation Plan of TSI OPE 2015/995 of 8 June 2015

In order to fill-in the table, it is important to refer to the implementation principles and guidelines referred to in paragraphs 7.1 and 7.2 of Commission Regulation (EU) on TSI OPE 2015/995 of 8 June 2015.

For Member States, it is important to note that most of the elements required in Questions 1 and 2 should be contained in the SMS of the Railway Undertakings and Infrastructure Managers.

Finally, the lines highlighted in yellow are the new requirements set out in the TSI OPE 2015/995 for which the national implementation plans shall be notified to the Commission by 1 July 2017 at the latest. All other requirements relate to Commission Decision 2012/757/EU on TSI OPE for which the national implementation plans should have been notified to the Commission by 31 December 2014.

## As general remarks.

Many of the requirements of TSI OPE are not applicable because of their lack of coherence with the safety system in the Italian rules framework. The implementation of all the requirements is possible only after the adoption of a coherent and self-consistent TSI OPE from the definition of the safety principles to the safety procedures. Therefore, the TSI OPE should be further developed by means of harmonisation of other fundamental operational principles and improving its implementation. As it is written in point 7 of the TSI OPE: "It is commonly understood that the full implementation of all elements of this TSI cannot be complete until the hardware (infrastructure, control and command, etc.) that is to be operated has been harmonised". In fact, the introduction of the rules without a gap analysis with the existing system done by the IM could jeopardise the safety and coherent system in the member

state. Instead, developing the TSI OPE in coherence with the other TSIs permit to avoid the use of National Rules and give to the Member State the possibility to implement the TSI OPE.

Therefore, this Template for the Implementation plan has to be seen as an initial phase supporting the migration to the target system. In fact, in this Template in "Question 1" is possible to find the answer "In force" because the requirement is fulfilled on the base of National rules, and in "Question 3 and 4" there are some reasons for maintain the National Rules and the changes suggested (needed) in TSI OPE.

LEGENDA: AMS=Attribuzioni in materia di sicurezza della circolazione ferroviaria; RCF= Regolamento per la circolazione ferroviaria; NQP=Norme per la qualificazione del personale impiegato in attività di sicurezza della circolazione ferroviaria; COR= Common Operating Rules (Appendix B TSI); PIR= Prospetto informativo della rete (NS);

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or who do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.1.2 Docum for driv	ers In force	Explanation: SMS of RUs	a) Yes No No Reference: AMS p. 2.3, 3.3, 3.5.1. RCF 2.20, 3.7 b) Yes No Justification: It is not possible withdraw the rules because they refer also to other safety related personnel.	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: To avoid misunderstandings, the information related to the interface operations	RU☑ IM□ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	<ul> <li>a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR?</li> <li>b) Can this NR be withdrawn? If not, please explain why not?</li> </ul>	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				between driver and the IM staff should refer to the original rules emitted by the entity in charge of it.	
4.2.1.2.1 Drivers ru	le book In force for the most of RUs.	Explanations: SMS of IM and RUs	a) Yes□ No☑ Reference: The requirement is not imposed by any NSR. The IM has the responsibility to writes the interface procedures between IM and RU personnel  b) Yes□ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: It is not possible to define the requirements if it is not clearly defined: Which is the aim of the rule book? Is it related only to operations? Is it used as training book? Is it	RU☑ IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Que	estion 3	Question 4	Question 5
`	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					mandatory for the driver to bring the rule book during the journey? How it is possible to guarantee the same format, and contents, for all the RUs without identify the format of the data the IMs has to deliver to the RUs? Moreover, it should be distinguished between the internal rules of each operator and the interface rules between drivers and signalman (interface rules IM	

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					personnel/RU personnel) that should be the aim of TSI OPE. At the end, should be identified the entity in charge for writing the interface rules.  For example, in Italy the IM writes the interface rules applying the safety principles and rules stated in TSI OPE, in RCF and in the others relevant national laws.	
					Therefore, in order to avoid	

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					incoherent	
					behaviours or	
					misunderstandings	
					between the	
					operating	
					personnel of IMs	
					and RUs, the	
					interface rules	
					shall be identical	
					for all the RUs	
					operating on the	
					same network (IM	
					and RUs should	
					refer to the same	
					rules). Just to	
					avoid	
					misunderstanding	
			1		between the	
1					signaller and the	
					driver, the	
					interface rules	
					should be	
<u> </u>					participated by	

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	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					each operator to its personnel exactly as they are written by the entity in charge of it. In the Rules book the interface's rules for different infrastructures have to be presented in the same format therefore the entities in charge to write the rules have to provide the rules in a "standard format". Consequently, it is needed the	

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					standardization of the sources.	
4.2.1.2.2	Description of the line and the relevant line-side equipment associated with the lines worked over	In force In force.	Explanation: SMS of IM and RUs RFI (IM) provides the RUs with the relative information. (The route books are also available on RFI's website). Any modification to the information contained within the route book is provided in due time (30 days before) by an IT system to the concerned RUs	a) Yes☑ No□ Reference: AMS p. 2.3, 3.5.1. RCF p. 2.20 RFI (IM) writes the DEL (Disposizioni di Esercizio delle Linee).  b) Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The requirements should be better defined In order to avoid errors it's better to transmit to personnel the documents (for example Fascicoli linea) written by IM rather than receive them in an	RU☑ IM☑ Other □, please state:

TSI OPE Require	ment	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					internal documents of RUs Which means "description of the line"? Which is the difference with the following paragraph 4.2.1.2.2.1?	
4.2.1.2.2.1	Preparation of the Route Book	In force	SMS of IM and RUs The IM provides the information to the RUs in a format that is the same for all the RUs (Fascicoli linea).	a) Yes No No Reference: RCF 2.20;4.12 b) Yes No Justification: The rules are related also to signalman and other safety related personnel that use the same information.	Specific case:  Common operation rule/ principle to be developed in appendix B:  Deficiency:  There is a lack of requirements about the format (the IMs should present the information to the	RU☑ IM☑ Other □, please state:

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	-				RUs in the same format).  If the digital system is used to provide the information could be easier, for the RUs, to match the requirements (one single "Route book" for each train).  List of minimum data to communicate.  At least the driver needs of the following information:  1. Timetable (arrival and departure time for commercial	

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					and operation issue)  2. The route book (information on the lineside signals, speed, stations, etc.) related to the single train.  The general information about the line between two or more cities: i.e. type of operation, type of line, number of track, length of the minimum track, service, etc.), (to be developed in detail). TSI OPE should take into	

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4.2.1.2.2.2	Modifications to information contained within the Route Book	In force.	SMS of IMs and RUs.  The IM provide the information to the RUs in due time before the application of the modifications	a) Yes☑ No□ Reference: RCF p. 2.20; 4.12 AMS p. 3.5.1 b) Yes☑ No□ Justification:	account in annex D the progressive implementation of the RINF as an harmonized tool to provide information for the compilation of route books.  Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: Define the timing (minimum time) for the delivery of modifications. Any modification of the	RU☑ IM☑ Other □, please state:

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	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					infrastructure data	
					that have impact	
					to the route book	
					(e.g. position of	
					relevant signals)	
					has to be	
					distributed at the	
					minimum time	
					possible before	
					the entry into	
					force of the	
					modification	
					(define a time	
					limit). The IM in	
					case of later	
					communication	
				•	has to inform the	
					RU or directly the	
					driver of the	
					infrastructural	
					modifications	
					before the train	
					leaving or arrive in	

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					front of the infrastructure modification (e.g. speed reduction). The RU has to adopt an internal organization capable to inform the driver before the departure. In case the RU uses technological device, as tablet, to provide the operational prescriptions to the drivers, it will be possible send the information in a digital format.  Set up a principle on the mandatory	

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		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					reading of prescriptions before the departure. It is necessary to introduce a specific rule on the necessity of the driver to read the prescriptions before the departure.	
4.2.1.2.2.3	Informing the driver in real time	In force.	SMS of IM and RUs. The IM gives the prescription directly to the driver	a) Yes☑ No☐ Reference: RCF p. 4.13; 4.14 b) Yes☐ No☑ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Set up a principle on the mandatory spot delivery of particular	RU☑ IM☑ Other □, please state:

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	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					prescriptions before the safety modification is in force (where delivery the prescription to the driver). The prescriptions related to safety issue (e. g. temporary speed reduction, etc.) not protected by the safety systems (ATC-ATP) have to be delivered to the driver close to the speed reduction where it on has to be respected (directly on the protected site: e.g.	

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					in front of the last	
	,				fixed signal).	
4.2.1.2.3	Timetables	In force.	Explanation: SMS of IM and RUs. These information are provided by an IT system to the concerned RUs that could print the timetable	a) Yes  No  No Reference:  "Istruzione per il servizio del personale di condotta delle locomotive" (NOTIF IT - IT-4-637-2) b) Yes  No  Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: Define the scope of timetable. If the "Timetable" is related only to commercial issue it is not relevant in railway safety operation. If the timetable refers to operation rules (e.g. operational orders as in the case the train	RU☑ IM☑ Other □, please state:

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	When has this requirement been implemented or wher do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.1.2.4 Rolling st	ck In force.	Explanation: SMS of IM and RUs	a) Yes⊠ No□ Reference: RCF p. 3.7 (DPC) for the Rolling stock. RCF p. 16 for the failure of rolling stock.	must not leave before the time of departure) the timetable has to be integrated in the train documents and refers to IM prescriptions. OPE TSI needs a deeper argumentation than the one provided by the current text  Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑	RU☑ IM☑ Other □, please state:

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				RCF p. 18 for the interface with the despatcher. b) Yes☑ No□ Justification:	No room for this requirement. The part of the requirement about the train characteristics is out of scope of TSI OPE (internal document of RU). The part of interface between driver and train dispatcher is part of rule book (see requirement 4.2.1.2.1)	
4.2.1.3	Documentation for railway undertaking staff other than drivers	In force	Explanation: SMS of IM and RUs	a) Yes☑ No□ Reference: AMS p. 2.3; 3.5.1 b) Yes□ No☑ Justification: The AMS establishes that the personnel	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑	RU☑ IM□ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				of the RUs has to be furnished with the relevant document for their tasks. The AMS refers not only to personnel involved in interoperability.	Justification: "Staff other than drivers" shall be clearly identified, qualified and trained, and their task should be described end well defined Language knowledge?)"	
4.2.1.4	Documentation for infrastructure managers staff authorising train movements	In force	Explanation: SMS IM.	a) Yes No No Reference: RCF 4.13 RFI's interface operational rule "Disposizione n.1/2014" (NOTIF IT: IT-S-7232) b) Yes No J Justification: OPE TSI doesn't include specific written order	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: OPE TSI doesn't include specific written order	RU□ IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
-	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			related to not ETCS lines	related to not ETCS lines	
4.2.1.5 Safety related communication between train crew, other railway undertaking staff and staff authorising train movements	In force.	Explanation: SMS of !M and RUs	a)Yes No Reference: NQP.  b)Yes No Justification:  The NQP precise the certification of the language knowledge for all the safety personnel.	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: In TSI OPE there is a lack of identification of these personnel and the tasks they perform (when they have to speak with the IM's personnel,). Adoption of standard phraseology for common safety	RU☑ IM☑ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Ques	tion 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
						related communication. To establish the clear role and task of the "other railway undertaking staff" authorised to speak with train dispatcher (who are these people? Which task they perform? When they have the necessity to speak with the IM personnel in the language of infrastructure?).	
4.2.2.1.1	Train visibility – general requirement	In force	Explanation: SMS RUs	I .	erence: L RCF	Specific case: □ Common operational rule/ principle to be	RU☑ IM□ Other □, please state:

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		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				b) Yes⊠ No□ Justification:	developed in appendix B: □ Deficiency: ☑ Justification:	
	·				Why a train has to be made visible in an interoperable railway system where trains are detected automatically.	
					We wonder if it is the case to manage also the lateral visibility of train.	
4.2.2.1.2	Front end lights	In force	Explanation: SMS of IM and RUs.	a)Yes☑ No□ Reference: RCF p. 3.2 (last dash) and 4.11 RFI RS b) Yes☑ No□	Specific case: □ Common operational rule/ principle to be developed in appendix B: □	RU回 IM回 (IM for the interface rules)  Other 回, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
	,			Justification:	Deficiency:  Justification: We thinks that this requirement has to be moved in TSI RST because it is not an operational rule. The operating rule about the failure of front end lights is managed in annex B.	
4.2.2.1.3	Rear end lights	In force.	Explanation: SMS of IM and RUs	a) Yes☑ No□ Reference: RCF 4.11 RFI RS b) Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The need of rear end lights is related to obsolete	RU덴 IM덴 (IM for the interface rules) Other 디, please state:

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					block system and should be moved under National Safety rules. If these obsolete system are still common in Europe, then it is needed harmonize the rear end signal in order to manage the transition period	
4.2.2.1.3.1	Passenger trains	In force.	Explanation: SMS of IM and RUs	a)Yes☑ No□ Reference: RCF 4.11 RF! RS b)Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU전 IM전 (IM for the interface rules) Other 口, please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.2.1.3.2	Freight trains in international traffic	In force .	Explanation: SMS of IM and RUs	a)Yes☑ No□ Reference: RCF 4.11 b) Yes☑ No□ Justification:	Specific case: ☐ Common operational rule/ principle to be developed in appendix B: ☐ Deficiency: ☑ Justification: As 4.2.2.1.3	RU IM IM IM IM IM IM IM (IM for the interface rules) Other Implease state:
4.2.2.1.3.3	Freight trains not crossing a border between Member States	In force	Explanation: SMS of IM and RUs In RFI it is in implementation on trial site.	a) Yes☑ No□ Reference: RCF 4.11 RFI RS b) Yes☑ No□ Justification:	Specific case: ☐ Common operational rule/ principle to be developed in appendix B: ☐ Deficiency: ☑ Justification:	RUI IMI (IM for the interface rules) Other  please state:
4.2.2.2.1	Train audibility – general requirement	In force	Explanation: SMS of RUs	a) Yes☑ No□ Reference: RCF 3.2 (8 <sup>th</sup> dash) b) Yes□ No☑ Justification:	Specific case:  Common operational rule/ principle to be	RU☑ IM□ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				The requirement in Italy is more restrictive but without a specific speed reduction for this failure.	developed in appendix B: □ Deficiency: □ Justification:	
4.2.2.2.2	Train audibility – control	In force.	Explanation: SMS of RUs	a) Yes□ No☑ Reference: b)Yes□ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: No room in TSI OPE. Move to TSI LOC and PASS	RU☑ IM□ Other □, please state:
4.2.2.3	Vehicle identification and Appendix H	In force.	Explanation: SMS of RUs	a) Yes□ No□ Reference: b) Yes□ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □	RU☑ IM□ Other □, please state:

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					Deficiency:  Justification: The aspects related to the characteristics of vehicles should be moved in the TSI Wag. and Loc. and Pass. The aspects related to operation has to be detailed here (somewhere).	
4.2.2.4.1	Safety of load	In force	Explanation: SMS of RUs	a) Yes☑ No□ Reference: RCF 7 b) Yes☑ No□ Justification: AMS 2.3 In RCF 7 it is possible withdrawn only the part related to the load of vehicle	Specific case: □ Common operational rule/ principle to be developed in appendix B: □	RU☑ IM□ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.2.4.2	Safety of passengers	In force.	Explanation: SMS of RUs	a) Yes No No Reference: AMS 2.3 RCF 4.28; 7; 24. b) Yes No Justification: RCF 4.28 is a requirement about the safety of passengers related to the trains characteristics and specific services.	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The RU should to evaluate any specific type of service and decide if it is necessary some additional requirement for the safety of passengers	RU☑ IM□ Other □, please state:
4.2.2.5	Train composition	In force.	Explanation: SMS of RUs	a) Yes☑ No□ Reference: RCF p. 1.6, 3.1, 4.3, 6.2 b) Yes□ No☑	Specific case:  Common operational rule/ principle to be	RU☑ IM□ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			Justification: First paragraph: the infrastructure characteristics and the compatibility of the trains should remain independent from the allocated path.	developed in appendix B: □ Deficiency: ☑ Justification: The requirements of the train composition should refer only to safety related principles. Instead of allocated path it is better to refer to the train compliance with the infrastructure. (Allocated path is related more to commercial issue e.g. speed to maintain the timekeeping, stops for commercial reason, etc). Is	

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
·	·	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					responsibility of the RU defines the trains characteristics for safety operation, e.g. braking performance, max. speed, etc.)	
4.2.2.6.1	Minimum requirements of the braking system	In force	Explanation: SMS of RUs	a) Yes No No Reference: RCF 6.6, 6.7. b) Yes No Justification: The rules about the braking system is more complex (there are many principles to be respected as: graduality, efficiency, etc.)	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The rule has to be completed with all the other concept about: the graduality, efficiency and efficacy after the	RU☑ IM□ Other □, please state:

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					continuative use, etc.	
4.2.2.6.2	Braking performance and maximum speed allowed	In force	Explanation: SMS of IM and RUs. (By means of an RFI interface operational rule.)	a) Yes☑ No□ Reference: RCF 2.20, 4.1, 4.12, 4.16 chapter 6 e 7 of RCF Disp. RFI 18/2015 b) Yes☑ No□ Justification: . If TSI OPE will include the principles it is possible delete the NSR.	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ some specific requirements have to be detailed for safety operation as: • Command of the braking system from device in the front end cab. • Graduality during the braking and in the brake release phases.	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Quest	tion 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	b) (	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
						• The braking system has to remain efficient after many braking and braking release (i.e. use of the brake on long slopes) • considering all the train characteristics	
4.2.2.7.1	Ensuring the train is in running order – general requirements	In force	Explanation: SMS of RUs	AMS RCF	erence: 5 2.3 16.6 16.5 16 7.1 6 3.2	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The TSI OPE should contains:	RU☑ IM□ Other □, please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				Justification: No, because the NRs contain more detailed prescriptions	- the principle that a train has to be checked before the departure; - the detailed interface procedures between IM and RUs; and - leave to the operators to write down their own internal procedures in compliance with the principles, the interface procedures	
4.2.2.7.2	Data required	In force	Explanation:	a) Yes☑ No□	and their SMS.  Specific case: □	RU☑ IM☑

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			SMS of IM and RUs	Reference:	Common	
			Some of these data are requested in the NS.	RCF 10.6 when	operational rule/	Other □,
				changes to the train data about safety	principle to be developed in	please state:
		l		operation occurred.	appendix B: □	
				b) Yes□ No☑	Deficiency: ☑	
				Justification:	Justification: Some	
				because safety	of these data are	
				related data (see	related to NS and	
				also 4.2.3.6.1)	are duplicated	
					4.2.3.2 when are	
					referred to safety	
					operational data	
4.2.2.8	Requirements for	In force	Explanation:	a) Yes团 No□	Specific case:	RU☑ IM☑
	signal and		SMS of IM and RUs	Reference:	Common	
	lineside marker			RCF p 5.3, 5.6	operational rule/	Other □,
	signalling			RFI RS art. 54	principle to be	please state:
				b) Yes□ No☑	developed in	
				Justification:	appendix B: 🗆	
				It is possible	Deficiency: ☑	
				withdraw only the	Justification:	
		,		requirement related	More detailed	
				to the visibility	information	

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					should be provided by the OPE TSI about the minimum distance from the train to the signal to be observed depending on the maximum speed of the line. Justification: Move to STI LOC and PASS	
4.2.2.9	Driver vigilance	In force with exceptions (see Explanation in question 2)	Explanation: SMS of IM and RUs  In force on the railway network, but in some zones the Italian health and safety territorially competent authorities emitted health and safety prescriptions against the use of the vigilance device of specific RUs running on their jurisdictional territory. Therefore, it is possible that some authorities emit health and safety	a) Yes☑ No□ Reference: RCF p. 3.2; 3.3; 4.22; 16.6. Direttiva Ministeriale 0044725/20.10.2006 b) Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: There is the necessity to issue	RU☑ IM☑ Other □, please state:

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			prescription about the obligation to switch off the vigilance device. In this case the RUs that want to operate in Italy have to install the additional device to "dissociate" the vigilance device. This specific case will be in force until the RUs will found a reasonable technical solution.  When the train is running on the protected line (ERTMS, ATC/ATP) as minimum the vigilance device, or other devices, should check that the driver is allowing the first movement of the	In RCF it is possible withdraw the bullet point in 3.2, and all the 3.3, in 4.22 it is possible withdrawn only the part related to the vigilance device.	a specific case related to the possibility to switch off (dissociation) of the driver vigilance (see explanation in question 2)	
4.2.3.1	Train planning	In force	train. Explanation: NS. SMS of IM and RUs.	a) Yes No M Reference: b) Yes No D Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: What is the reason of this rule in TSI OPE?	RU□ IM☑ Other □, please state:

TSI OPE Requi	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.3.2	Identification of trains	In force	Explanation: SMS of IM and RUs NS	Yes No No Reference: RCF p. 4.10 Yes No Yes	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: Add as a specification: "Each train must be identified by a unique train number per day"	RU☑ IM☑ Other □, please state:
4.2.3.2.1	Format of train running number	In force	Explanation: SMS of IM and RUs NS	Yes☑ No□ Reference: RCF p. 4.10 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Deficiency:	RU☑ IM☑ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					Justification:	
4.2.3.3.1	Checks and tests before departure	In force	Explanation: SMS of RUs	Yes☑ No□ Reference: AMS p. 2.3, RCF 7.1, 7.2, 7.3, 7.4, 9.2, 9.3, 9.4. Yes□ No☑ Justification: It is not possible delete the 9.2, 9.3 and 9.4 (see deficiency)	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: Before the departure the driver shall checks: the train data characteristics are set in the safety device; the train documents are complete and coherent.	RU☑ IM□ Other □, please state:
4.2.3.3.2	Informing the infrastructure manager of the trains	In force	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF p. 10.6	Specific case: □ Common operational rule/ principle to be	RU☑ IM☑ Other □, please state:

TSI OPE Require	ment	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
	operational			RFI PGOS Art. 81	developed in	
	status			bis.  Yes No Justification:  This rule cannot be removed because the RCF requirement is operational: direct communication between the driver and the despatcher, instead of general information as "  The railway undertaking shall inform the IM of any anomaly affecting the train".	appendix B:  Deficiency:  Justification: In Appendix C could be room for directed operational communication between the driver and the despatcher, about any irregularity of the train running as: lack of adherence, reduced power, presence of obstacle on the	
					rail, fire on board, etc. The TSI requirement	

TSI OPE Requir	ement	Question 1	Question 2	Questic	on 3	Question 4	Question 5
	,	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	sp (N th re Ni b) Ca w	o you have any pecific National Rule NR) that relate to his? What is the eference/title of the R? an this NR be hithdrawn? If not, lease explain why ot?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
						should provide a deeper argumentation for any specific degraded situation, but seems to be possible only for harmonized technical systems (i.e. ETCS implementation)	
4.2.3.4.1	Traffic management → general requirements	In force.	Explanation: NS. SMS IM and RUs	Yes□	ence:	Specific case:  Common operational rule/ principle to be developed in appendix B:  We need define a principle about "Traffic management" and to list only the	RU☑ only for the communication procedures. IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.3.4.2.1 Train reporting – data required for train position reporting	In force	Explanation: SMS.IM and RUs. NS. PIC. PICWEB, etc. and other telematics applications.	Yes□ No☑ Reference: Yes□ No□ Justification:	interfaces communications with the RUs (the internal organization of IM is part of SMS). Deficiency: □ Justification: Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: □ Justification: These data refer to NS we are wondering if the TSI OPE is the correct document that describe these	RU□ IM☑ Other □, please state:

TSI OPE Require	ment	Question 1	Question 2	Que	stion 3	Question 4	Question 5	
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for thi process?	is
						"agreements" between IMs and RUs (In TAF and TAP are more detailed and precise requirements on these matter)		
4.2.3.4.2.2	Predicted hand over time	In force	Explanation: SMS of IM and RUs.	Yes	erence:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: These data refer to NS we are wondering if the TSI OPE is the correct document that describe these	RU□ IME Other □, please state:	

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					"agreements" between IMs and RUs	
4.2.3.4.3	Dangerous goods	In force	Explanation: SMS of IM and RUs See also NS and RID.	Yes☑ No□ Reference: AMS p. 2.3 DE 3/2010; DE 18/2015; NS Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: All the requirements should be written in the RID (if not yet)	RU☑ IM☑ Other □, please state:
4.2.3.4.4	Operational quality	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: AMS p. 2.1, 5.4 Yes☑ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: □	RU IM

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					Justification: The whole requirement deals with the monitoring process that is part of SMS (out of the scope of TSI OPE). Anyway, all the entities involved should be considered at least RUs and ECM).	
4.2.3.5	Data recording	In force.	Explanation: SMS of IM and RUs Use of technological systems	Yes☑ No□ Reference: RCF 1.7, 3.2 (5° dash), 3.4 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or whe do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
· · · · · · · · · · · · · · · · · · ·	ng of In force.	Explanation: SMS of IM	Yes No□ Reference: RCF 1.7, 2.11, 2.19, 3.4, 4.15 Disposizione 48/2001, Disposizione 51/2005, Disposizione 1/2014 — Appendix 1 and 2, RCF ANSF 3.4 Yes No□ Justification: Rules related Safety communication can be withdrawn if well integrated in OPE TSI Appendix C (registered communication).	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: The whole requirement deals with the monitoring and accident investigation processes that is part of SMS (out of the scope of TSI OPE). OPE TSI does not cover the specific management (interface IM-RU) of the situations	RU□ IM☑ Other □, please state:

TSI OPE Requireme	ent	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					related to hot axle alarms both for ERTMS lines than for conventional lines.	
	Recording of supervision data on-board the train	In force.	Explanation: SMS of RUs	Yes☑ No□ Reference: RCF p. 3.2 (5° dash), 3.4.  Yes☑ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: The whole requirement deals with the monitoring process that is part of SMS (out of the scope of TSI OPE).	RU☑ IM□ Other □, please state:

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.2.3.6.1	Degraded operation advice to other users	In force	Explanation: SMS of IM and RUs NS	Yes☑ No□ Reference: AMS p. 2.3 Yes☑ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: This requirement should be part of NS.	RU□ IM☑ Other □, please state:
4.2.3.6.2	Degraded operation advice to train drivers	In force	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF: "Parte Terza: Esercizio in condizioni di anormalità e guasti" Disposizione 1/2014 - Appendix 1 and 2 Yes□ No☑ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The degraded operation should be developed in appendix B for	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				The requirement is too general.	uniform application on the European rail network. Appendix C does not include all the written order needed to inform drivers (especially for conventional lines)	
4.2.3.6.3	Degraded operation — contingency arrangements	In Force	Explanation: SMS of IM and RUs NS	Yes☑ No□ Reference: AMS p. 2.3 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: They seem requirements to be managed in the	RU <b>전 IM</b> 전 Other <mark>□,</mark> please state:

TSI OPE Requ	uirement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
_					NS (Directive 2012/34/UE)	
4.2.3.7	Managing an emergency situation	In force.	Explanation: SMS of IM and RUs NS and Emergency plans	Yes☑ No□ Reference: AMS p. 2.3. Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: They seem requirements to be managed in the NS (Directive 2012/34/UE) and SMS	RU☑ IM☑ RUs only for consultation Other □, please state:
4.2.3.8	Aid to train crew in the event of an incident or of a major rolling stock malfunction	In force. Agreement between RUs and IM in NS.	Explanation: SMS of IM and RUs NS. SMS	Yes☑ No□ Reference: AMS p. 2.3. Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Deficiency:	RU☑ IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				Justification: RUs SMS	
4.6.1 Professional competence for staff undertaking safety critical tasks associated with accompanying a train	The principle is already in force, but it is implemented on the bases of National procedures. It shall apply to all personnel appointed after 31st December 2016 for "Accompanying a train" and "Preparing trains". It shall progressively apply also to all personnel appointed	Explanation: SMS of IM and RUs	Yes No No Reference: NQP Yes No V Justification: It will possible withdrawing the rule only if the deficiency signalled in question 4 will be solved.	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The TSI OPE should apply to all the personnel appointed for "preparing trains", and progressively extended to all safety related personnel.	RUI IMI Other I, please state: ANSF

TSI OPE Requ	uirement	Question 1	Question 2	Que	estion 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
		before 1st January 2017 for "Accompanying a train" and "Preparing trains", in accordance with the implementation plan to be completed by 31st December 2020.					
4.6.2.1	Language competence - principles	It will be applied after the rewriting of appendix C.	Explanation: SMS of IM and RUs NR are applied.	p. 1 Yes Jus It w	ference: 1.5 RCF e 3.1 NQP	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RUÍ IMI Other 口, please state:

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				signalled in question 4 will be solved.	see the related part of the template (Appendix C)	
4.6.2.2	Language competence – level of knowledge and appendix E	See 4.6.2.1	Explanation: SMS of IM and RUs	Yes□ No□ Reference: p. 1.5 RCF e 3.1 NQP  Yes□ No□ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: □ Justification:	RU□ IM□ Other □, please state:
4.6.3.1	Initial and ongoing assessment of staff – basic elements	In force	Explanation: SMS of IM and RUs	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU□ IM□ Other □, please state:

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.6.3.2	Analysis and update of training needs	In force	Explanation: SMS of IM and RUs  See template in points related to appendix F and G and 4.2.1.	Yes□ No□ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU回 IM回 Other ⊡, please state: Training centre.
4.6.4	Auxiliary staff	In force	Explanation: SMS of IM and RUs	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
4.7.1	Health and safety conditions – introduction	The principle is already in force, but it is implemented on the bases of National procedures. The	Explanation: SMS of IM and RUs  Italian ministry has stated that the medical and/or psychological examinations shall be carried out by medical doctors and	Yes☑ No□ Reference: RCF p. 1.5 NQP p. 2.4.2., 3.1.  Yes□ No☑ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑	RUI IMI Other I, please state: The bodies individuated by the Ministry to

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
		implementation plan to be completed by 31st December 2020	psychologists appointed by bodies individuated by the Ministry.  The 4.7.2 procedures and 4.7.3 requirements shall apply to all personnel appointed after 31st December 2016 for "Accompanying a train".  They shall progressively apply also to all personnel appointed before 1st January 2017 for "Accompanying a train", in accordance with the implementation plan to be completed by 31st December 2020	These Italian rules also apply to other personnel not concerned in TSI OPE as signalmen, dispatchers, and "Preparing trains" operators. The existing National Rules shall continue to apply for the "accompanying a train" until the 31st	Justification: In TSI OPE other personnel should be considered.	carry out medical and/or psychological examinations
		0 474		December 2020.		DUEZ 1945Z
4.7.2.1	Medical examinations and psychological assessments — before appointment	See 4.7.1	Explanation: SMS of IM and RUs	Yes☑ No☐ Reference:  Yes□ No☑ Justification:  See 4.7.1	Specific case: ☐ Common operational rule/ principle to be developed in appendix B: ☐ Deficiency: ☐ Justification:	RUM IMM Other M, please state: See 4.7.1

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
4.7.2.2.1	After appointment – frequency of periodic medical examinations	See 4.7.1	Explanation: SMS of IM and RUs  Italian national rules for "Accompanying a train" staff require only medical examinations from fortieth year every three years and from the fifty-second year every two years.  Italian national rule require no psychological examination for "Accompanying a train".	Yes☑ No☐ Reference:  Yes☐ No☑ Justification:  It is not possible to withdraw the rules because they are also applied to signalmen, dispatchers, and "Preparing trains" operators. The existing National Rules shall continue to apply for the "accompanying a train" until the 31st December 2020.  Criteria for time-scaling such medical examinations will be	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU IM IM IM Other I, please state: See 4.7.1.

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				decided by RU and IM giving priority to senior old staff.		
4.7.2.2.2	Minimum content of periodic medical examination	See 4.7.2.2.1	Explanation: SMS of IM and RUs	Yes No	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				Criteria for time- scaling such medical examinations will be decided by RU and IM giving priority to senior old staff		
				the Italian legislation and prescriptions on Health and safety at work the screening for abuse of alcohol and drugs is provided in a more restrictive way (at		
<del></del>				least once a year without notice).		
4.7.2.2.3	Additional medical examinations and/or	The requirement will be applied from 1st January 2017.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: NQP p.4 Yes☑ No□ Justification:	Specific case: □ Common operational rule/ principle to be	RU☑ IM☑ Other □, please state:

TSI OPE Requ	irement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
	psychological assessments				developed in appendix B: □ Deficiency: ☑ Justification:	
4.7.3.1	Medical requirements – general requirements	See 4.7.1	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF p. 1.5 NQP p. 2.4.2., 3.1.  Yes□ No☑ Justification: See 4.7.1.	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: □ Justification:	RU IM IM Other I, please state: See 4.7.1
4.7.3.2	Vision requirements	See 4,7.1	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF p. 1.5 NQP p. 2.4.2., 3.1.  Yes□ No☑ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU덴 IM덴 Other 덴, please state: See 4.7.1

TSI OPE Requ	uirement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
•				See 4.7.1		
4.7.3.3	Hearing requirements	See 4.7.1	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF p. 1.5 NQP p. 2.4.2., 3.1.  Yes□ No☑ Justification:  See 4.7.1	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU던 IM区 Other 던, please state: See 4.7.1
4.8	Registers of infrastructure and vehicles	In force. See RINF e RIN.	Explanation: SMS of RUs	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU덴 IM□ Other 덴, please state: ANSF for the database
4.8.1	Infrastructure	In force. RINF	Explanation: SMS of IM. Requirements listed in annex D are available on RFI's website at the following link (FL) http://site.rfi.it/quadroriferimento/default.htm.	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be	RU□ IM☑ Other ☑, please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
·		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			In addition the same information are sent by		developed in	ANSF for the
			certified email address to every involved RU.		appendix B: 🗆	database RINF
			So far, only the track plans are not yet provided		Deficiency: □ Justification:	
4.8.2	Rolling stock	In force. RIN	Explanation:	Yes□ No□	Specific case: □	RU☑ IM☑
			SMS of IM and RUs	Reference:	Common	
					operational rule/	Other □,
				Yes□ No□	principle to be	please state:
				Justification:	developed in	ANSF for the
					appendix B: 🗆	database RIN
					Deficiency: □	
					Justification:	
Appendix	ERTMS/ETCS	From 2005	Explanation:	Yes☑ No□	Specific case: □	RUØ IMØ
Α	operating rules	till now. Any	Operational and technical rules (Subsystems:	Reference:	Common	
	and principles –	new HS section	OPE, CCS, INFRA, ENERGY). New rules are	Interface	operational rule/	Other □,
	version 4	of line has been	issued for the upgrade of ETCS L2 lines and for	operational rules	principle to be	please state:
		implemented	the putting in service of new lines. Moreover	between IM and RUs	developed in	
		according to	new rules will be needed for specific section of	issued by the IM	appendix B: 🗆	
		the EU SRS.	lines implemented with ETCS L1 because the		Deficiency: ☑	
			existing rules does not cover that field (they only cover ETCS L2)	Yes□ No☑	Justification:	
			The Italian rules will be harmonized at the end	Justification:	The ongoing	
			of the re-writing of TSI OPE, when the Appendix	The withdrawing of	analysis of	ļ.
			of the re-writing of 131 or E, which the Appendix	some parts of the	compatibility	

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
		A and the TSI OPE rules will result coherent and	national framework	between the	
		auto consistent and all the risks taken into	in order to adopt	Appendix A and	
		account by the IM and RUs.	the Appendix A rules	National safety	
			could jeopardize the	principles is	
			internal coherence	showing some	
			of the national	incoherencies. For	
			framework. The TSI	example rule 5.1.6	
			OPE, Appendix A	of Appendix A is	
			included, should be	not in line with the	
			a complete and	National safety	
			coherent set of rules	principle that	
			to be adopted for	every exclusion of	
			replacing of the	the full ATC	
			whole national	system supervision	
			framework without	(e.g. switch from	
			spot amendments.	FS to SR) made by	
			Appendix A is mainly	the driver shall be	
			focused on a driver	always authorized	
			point of view	by the signalman.	
			and activities.	In particular it	
			Specific operational	should be included	
			situation	a	
			(management of		

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			degraded situation) needs more detailed rules than the ones included in the Appendix A.	section to specify the rule for border crossing trains. The ETCS has been developed reflecting the National operating and technical principles (train categories, braking rules, axle load, gauge). Different rules implementations have brought to stop the trains at the borders, anyway, despite the same System (ETCS) was implemented,	

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Ru (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	specific case or that a specific common	Who is the actor responsible for this process?
					Annex C of Appendix A (Non harmonized rules) should be developed and implemented (new points) in order to cover other OPE situations	
Appendix B.1	Sanding	Partially in force.	Explanation: SMS of IM and RUs The IM shall implement the COR	Yes☑ No□ Reference: RFI IPCL Art. 7 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: How to manage the case of automatic	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					intervention of "sanding".	
Appendix B.2	Departure of a train	In force	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF p. 4.18, 9.1, 9.5, 9.6. RFI RS art. 24 Yes□ No☑ Justification:	Specific case: □ Common operational rule/ principle to be developed in appendix B: □ Deficiency: ☑ Justification: 4.18 is referring to all signal at stop aspect.  The requirements are too generic and should be detailed or linked to other detailed TSI rules (see 4.2.3.3.1); for example the driver checks related to	RU☑ IM☑ Other □, please state:

TSI OPE Requirement	Question 1	Question 2	Que	estion 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) b)	Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					the first condition should be detailed (the route is correctly set, etc.). Moreover, it is not clear whether the first condition includes the written orders. The OPE TSI rule doesn't cover the case where the train does not receive a MA from the signalling system and a Signaller's communication (by means of a written order) is needed	

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
Appendix	No authorisation	In force.	Explanation:	Yes☑ No□	Specific case: □	RU☑ IM☑
B.3	of train movement		SMS of IM and RUs	Reference: RCF p. 10.6. Yes□ No☑ Justification:	Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	Other □, please state:
Appendix B.4	Complete failure of front end lights	Partially in force	Explanation: SMS of IM and RUs (The Italian safety principle in force doesn't discipline the specific mean to detect the front end with a portable front end light)	Yes☑ No□ Reference: RCF p. 16.6, 16.7 RFI RS art. 20 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix B.5	Complete failure of rear end signal	Partially in force	Explanation: SMS of IM and RUs (The Italian safety principle allows the train to run up to the end of the journey only if the rear end is identifiable, doesn't foresee the train to proceed with special arrangements between	Yes☑ No□ Reference: RCF. 16.7, RFI RS art. 20  Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			signaller and driver in case of complete rear end failure)		Deficiency: ☐ Justification:	-
Appendix B.6	Failure of the audible warning device of a train	Partially in force.	Explanation: SMS of IM and RUs	Yes No No Reference: RCF. 16.6, (8 <sup>th</sup> dash) Yes No Justification: See question 4 (Italian safety principle states that the train can run up to the next station unless there are situations which require the use of audible warning device)	Specific case:  Deficiency:  Justification: The requirement should clarify that the train can run up to the nearest location where the device can be repaired unless there are situations (not only level crossings related) which require the use of audible warning device and can't be managed in different ways. Moreover it's not	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
·		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					clear the scope of the speed limit in case of the failure.	•
Appendix B.7	Failure of a level crossing	Partially in force (see question 4)	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 15, RFI DE 8/2014 Yes□ No☑ Justification: See deficiency question 4	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The conditions that permits train to pass a defected level crossing depend not only on the nature of the failure but also on the specific characteristics of the LC, of the rolling stock and of the environment	RU☑ IM☑ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					(visibility, density of road traffic etc.) and on the possible measures taken by the signaller in order to guarantee the absence of road traffic until the train is perceived as an obstacle by the road users.	
Appendix B.8	Failure of radio communication	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 16.5, 16.6. (7 <sup>th</sup> dash) Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix B.9	Running on sight	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 4.17,	Specific case: □ Common operational rule/	RUM IMM

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
			Yes☑ No□ Justification:	principle to be developed in appendix B: □ Deficiency: ☑ Justification: "Proceed with caution" is too undetermined and should be deleted. What really matters is that the driver must be able to stop short of any stop aspect or obstacle, taking into account the line visible in advance. This point does not specific the value (maximum speed) of Running	Other □, please state:

TSI OPE Requi	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					on sight and it differs from Network to Network	
Appendix B.10	Assistance to a failed train	In force	Explanation: SMS of IM and RUs	Yes☑ No☐ Reference: RCF 18, Yes☐ No☑ Justification: (the national safety principle specifies that the driver of the failed train must place a stop marker (a red flag or a red light) in order to help the assisting train to locate the assisted train)	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The TSI requirement should state that the driver of the failed train must place a stop marker (a red flag or a red light) in order to help the assisting train to	RU☑ IM☑ Other □, please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					locate the assisted train	
Appendix B.11	Authorisation to pass a signal showing a stop aspect/indication	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 11.3 Yes☑ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix B.12	Anomalies in lineside signalling	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 10.6, 10.9, Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix B.13	Emergency call	In force.	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 10.4, 10.5 Yes☑ No□	Specific case: □ Common operational rule/ principle to be	RU☑ IM☑ Other □, please state:

TSI OPE Requir	rement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				Justification:	developed in	
					appendix B: 🗆	
					Deficiency: 🗆	
					Justification:	
Appendix	Immediate	Partially in force	Explanation:	Yes☑ No□	Specific case: □	RU☑ IM☑
B.14	actions to		SMS of IM and RUs	Reference:	Common	l <u>_</u>
	prevent danger			RCF 10.1, 10.3, 10.6,	operational rule/	Other □,
	to trains			10.7, 16.2	principle to be	please state:
				Yes□ No <b>☑</b>	developed in	
				Justification:	appendix B: □	
				the Italian safety	Deficiency: ☑	
				principles specifies	Justification:	
				further obligations of driver and		
				signaller	For example should be	
				Signaliei	identified means	
					to signal the	
					danger (move the	
					hands or lamps	
					vigorously,, the	
					use of shunt	
					device on lines	
					with automatic	

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					block system,), immobilize the train, etc	
Appendix C.2	Communication structure	In Force	Explanation: SMS of IM and RUs	Yes☑ No☐ Reference: RCF 1.7, 4.15, 4.25, 4.26 RFI Istruzione per le telecomunicazioni  Yes☐ No☑ Justification:  The Italian safety principle establish that the driver must send and receive also verbal communications only if the train is standing still, with the exception of unexpected	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:  The driver must send and receive also verbal communications only if the train is standing still, with the exception of unexpected emergency situations (such as the sending or	RU☑ IM☑

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				emergency situations (such as the sending or receiving of emergency calls).	receiving of emergency calls).	
Appendix C.3	Communication methodology	Partially in force (see question 4)	Explanation: SMS of IM and RUs	Yes☑ No□ Reference: RCF 4.15, 10.6 RFI Istruzione per le telecomunicazioni  Yes□ No☑ Justification: See question 4	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification: The responsibility to ensure that the signaller is communicating with the proper driver and vice versa should be allocated on both agents and not	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					only on the signaller	
Appendix C.4	Communication rules	Partially t in force.	Explanation: SMS of IM and RUs	Yes□ No☑ Reference: RFI Istruzione per le	Specific case:  Common operational rule/	RU☑ IM☑ Other □,
			Only the requirement related to the numbers. International alphabet to spell the letters is not used because the base of communication is that the drivers shall be able to speak in a minimum level (level B1) the operative language (it means the IM language).	telecomunicazioni Yes☑ No□ Justification:	principle to be developed in appendix B: □ Deficiency: ☑ Justification: The usefulness of the International Phonetic Alphabet is not evident because the driver has to know anyway the national language spoken by the IM (included obviously the national alphabet).	please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
Appendix	Communication	Not in force (at	Explanation:	Yes□ No☑	Specific case: □	RUØ IMØ
C.5	terms (general)	the moment	SMS of IM and RUs	Reference:	Common	
		the terms are			operational rule/	Other □,
		not formalised in any national		Yes□ No□ Justification:	principle to be developed in	please state:
		rule or principle).			appendix B: 🗆	
		See also row			Deficiency: ☑  Justification:	
		"appendix C2",			We do not see any	
					benefit to use that	
					terms. Saying that	
					if a	
					communication is	
					missed or not	
					understood is sufficient to	
				•	request its	
					repetition	
Appendix	Written orders	In force	Explanation:	Yes☑ No□	Specific case: □	RUØ IMØ
C.6			SMS of IM and RUs	Reference:	Common	
				RCF 4.13, 4.14, 4.15	operational rule/	Other □,
					principle to be	please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
				RFI DE 1/2014 - Instruction for book of forms Yes☑ No☑ Justification:	developed in appendix B:  Deficiency:  Justification:  It shall be specified that a written order is needed for the traceability of the safety communication between drivers and signallers (pure verbal orders are not sufficient)	
Appendix C.7	Terms (written orders)	Not in force (at the moment the terms are not formalised in any national	Explanation: SMS of IM and RUs	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:	RU☑ IM☑ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
		rule or principle).			Deficiency: □ Justification:	
Appendix C.8	Book of forms	In force on the base of a specific operational rule issued by the IM	Explanation: SMS of IM and RUs Waiting for IM new rules, except for point 8.5.1 third bullet (table containing the international phonetic alphabet)	Yes□ No☑ Reference: Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix D	Elements the IM has to provide to the RU for the Route Book and for the train compatibility over the route intended for operation	In force for the Route book	Explanation: SMS of IM and RUs NS	Yes□ No☑ Reference:  Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM☑ Other □, please state:
Appendix F.1	Minimum elements relevant to	See 4.6.1	Explanation: SMS of RUs	Yes☑ No□ Reference: NPQ Allegato 2	Specific case: ☐ Common operational rule/	RU⊠ IM□

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
	professional qualification for the tasks associated with 'accompanying trains' – general requirements			Yes□ No☑ Justification: See 4.6.1.	principle to be developed in appendix B: □ Deficiency: □ Justification:	Other □, please state:
Appendix F.2	Professional knowledge	See 4.6.1.	Explanation: SMS of RUs	Yes☑ No□ Reference: NPQ Allegato 2 Yes□ No☑ Justification: See 4.6.1.	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
Appendix F.3	Ability to put the knowledge into practice	See 4.6.1.	Explanation: SMS of RUs	Yes☑ No□ Reference: NPQ Allegato 2 Yes□ No☑ Justification: See 4.6.1.	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:

TSI OPE Requir	ement	Question 1	Question 2	Question 3	Question 4	Question 5
	_	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
Appendix	Minimum	See 4.6.1.	Explanation:	Yes☑ No□	Specific case: □	RU☑ IM□
G.1	elements		SMS of RUs	Reference:	Common	
	relevant to			NPQ Allegato 1	operational rule/	Other □,
	professional qualification for			Yes□ No☑ Justification:	principle to be developed in	please state:
	the tasks of			See 4.6.1.	appendix B: 🗆	
	preparing trains				Deficiency: □	
	– general requirements				Justification:	
Appendix	Professional	See 4.6.1.	Explanation:	Yes⊠ No□	Specific case: □	RU☑ IM□
G.2	knowledge	•	SMS of RUs	Reference:	Common	
				NPQ Allegato 1	operational rule/	Other □,
				Yes□ No☑	principle to be	please state:
				Justification:	developed in	
				See 4.6.1.	appendix B:	
					Deficiency:   Justification:	
Appendix	Ability to put the	See 4.6.1.	Explanation:	Yes⊠ No□	Specific case: □	RU☑ IM□
G.3	knowledge into		SMS of RUs	Reference:	Common	
	practice			NPQ Allegato 1	operational rule/	Other □,
				Yes□ No☑	principle to be	please state:
				Justification:	developed in	
	<u> </u>			See 4.6.1.	appendix B: 🗆	

TSI OPE Require	ment	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					Deficiency: □ Justification:	
Appendix H.1	European vehicle number and linked alphabetical marking on the bodywork – general provisions	In force	Explanation: SMS of RUs	Yes□ No□ Reference: Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
Appendix H.2	General arrangements for external markings	In force	Explanation: SMS of RUs	Yes□ No□ Reference: Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
Appendix H.3	Wagons	In force	Explanation: SMS of RUs	Yes□ No□ Reference: Yes□ No□ Justification:	Specific case: □ Common operational rule/ principle to be	RU☑ IM□ Other □, please state:

TSI OPE Require	ement	Question 1	Question 2	Question 3	Question 4	Question 5
		When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
					developed in	
					appendix B: □ Deficiency: □ Justification:	
Appendix H.4	Coaches and hauled passenger stock	In force	Explanation: SMS of RUs	Yes□ No□ Reference: Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
Appendix H.5	Locomotives, power cars and special vehicles	în force	Explanation: SMS of RUs	Yes□ No□ Reference: Yes□ No□ Justification:	Specific case:  Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	RU☑ IM□ Other □, please state:
Appendix H.6	Alphabetical marking of	In force	Explanation: SMS of RUs	Yes□ No□ Reference:	Specific case: □	RUØ IM□

TSI OPE Requirement	Question 1	Question 2	Question 3	Question 4	Question 5
	When has this requirement been implemented or when do you plan to be compliant with this requirement?	How is this requirement implemented in your MS?	a) Do you have any specific National Rule (NR) that relate to this? What is the reference/title of the NR? b) Can this NR be withdrawn? If not, please explain why not?	Does this requirement mean that you need a specific case or that a specific common operational principle/rule should be developed in Appendix B or that a deficiency in the TSI should be raised?	Who is the actor responsible for this process?
interoperability capability			Yes□ No□ Justification:	Common operational rule/ principle to be developed in appendix B:  Deficiency:  Justification:	Other □, please state: