

# POSITION PAPER

**ERA Report “Report on the possibility to use smartcards combining train driving licences and complementary certificates”**

Brussels, November 26<sup>th</sup> 2012

COMMUNITY OF EUROPEAN RAILWAY AND INFRASTRUCTURE COMPANIES - COMMUNAUTÉ EUROPÉENNE DU RAIL ET DES COMPAGNIES D'INFRASTRUCTURE - GEMEINSCHAFT DER EUROPÄISCHEN BAHNEN UND INFRASTRUKTURGESELLSCHAFTEN



## 1. REFERENCE DOCUMENT

Report on the possibility to use smartcards combining train driving licences and complementary certificates

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## 2. INTRODUCTION

This Position Paper makes public the official CER beliefs and recommendations on the ERA report “Report on the possibility to use smartcards combining train driving licences and complementary certificates”

## 3. GENERAL COMMENTS

CER welcomes the implementation of structured analysis - in particular, the comprehensive and independent impact analysis by a renowned business consultant.

The report submitted to the result coincides completely with the assessment of the CER. The additional increment of safety with the use of smart card is very small and is in no economic relationship with the required effort. Therefore, it is perfectly correct not to make today any mandatory requirement in Europe for the use of the smart card.

The previously report's findings should be further developed under leading management of ERA to a technical and professional harmonized concept (of requirements and necessary interface definitions) to allow RU to order harmonized technology by manufacturers. So the sector can preserve with regards to the economic effects the future and the possible need in the medium or long term to profit on the use of only one device from all the data necessary for the driver job. Especially the data of the certificate appear too numerous and not harmonized. A work of revision in this direction should be undertaken.

Further solutions to use smartcards combining train driving licences and complementary certificates are much related with the solution that will be found for the interoperability of the Registers.

#### 4. DETAILED COMMENTS

CER would like to note the following facts:

- Page 5 – SWOT-analysis:  
A system for whole Europe cannot be flexible enough to realize specific change request of RU in short periods.  
There are only the cases “lost” or “stolen” discussed. What is with defect cards or card-readers? Do we want not to run a train only a card or a card-reader does not work anymore?
- Page 6 – cost-benefit-analysis:  
It is not a question who large a country is. With regards to the costs it is in first a decision of each RU and its intern processes.
- Page 22 - Technical specification TDL – chip card aspects:  
Any set of RU-information on the card have to be protected for changing or overwriting by another RU.

## Disclaimer

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