

## Consultation questionnaire

To be returned by **11 October 2024**

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**Document number:** RIS-2700-RST

**Document title:** Verification of Conformity of Engineering Change to Rail Vehicles

**Issue number:** 3

Please ensure that this questionnaire and all comments (including 'not applicable') are returned to arrive at [consultation@rssb.co.uk](mailto:consultation@rssb.co.uk) on or before the date shown above.

Please pass this consultation to relevant people within your organisation for review and comment.

### 1. Are you representing the views of any organisation?

Yes

### 2. Do you or your organisation support the Rolling Stock Standards Committee approval to publish this document?

My organisation supports the standards committee approval of the publication of this document subject to the comments / suggestions being considered.

### 3. Your information

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RSSB will use the information on this form to collate and respond to consultation comments. We will disclose your information to our members, service providers, agents and others who have commented for this purpose. Additionally, we will publish this information on the consultations website ([www.consultations.rssb.co.uk](http://www.consultations.rssb.co.uk)) unless you expressly request your name and job title remain confidential.

## RIS-2700-RST

Use a separate row for each comment, add rows as necessary.

No	Page	Clause	Comment	Suggestion
1	many		Re references to 'owner or keeper', Some are only owner in document	To be consistent, add 'or keeper' to G3237, 475, 5317, 617 and 661,  Alternatively add either 'owner' or 'keeper' to definitions and show it means both
2	11	G2.2.4	One of the reasons for change is cited as providing clarity between the roles of RU and ECM on vehicles after completion of engineering change. The statement that the RU as train operator (ie not the ECM) is responsible for safely reintroducing the vehicle into service does not provide more clarity. Reintroducing a vehicle into service is easily confused with the ECM 4 maintenance delivery function of 'release to service' and the ECM 3 maintenance management function of 'return to operation'	Wording to the effect of:  The ECM is responsible for returning the vehicle to operation following completion of the engineering change. The means of ensuring the risks to safety arising from such changes are managed in an acceptable fashion are described in the ECM's certified system of maintenance.
3	11/12	G2.2.12	Last sentence no longer true if above accepted	Remove ...as stated in G2.2.4
4	12	Table 1	RU column, top right cell 'operationally safe' – this is another definition of safe to run, fit to run, in a safe state of running etc. we should be narrowing down the number of definitions!!!  It states that the RU is responsible for return the modified vehicle or vehicles to service. If the G2.2.4 reference is accepted this needs to be removed	
5	16	G3.1.1	Figure 1 only shows First Party on it and leaves reader to assume which portion of diagram is second and third	Add 'Second Party' and 'Third Party' to Figure 1
6	20	Figure 2	Maybe clarify bottom boxes of flowchart to address question of 'if I do not prefer to use a third party and I have suitable in house capacity why is use of independent company involved driving me to use the assurance checks of the independent party?'	

No	Page	Clause	Comment	Suggestion
7	44	G6.3.5	<p>It states that: Interested parties would typically include the RU, where known, and the vehicle owner or keeper. The vehicle ECM, manufacturer and R2 can also require copies, where appropriate.</p> <p>Should the ECM not be 'promoted' to be a definite interested party?</p>	Interested parties would typically include the RU, where known, the vehicle ECM and the vehicle owner or keeper. The vehicle manufacturer and R2 can also require copies, where appropriate.
8	45	G6.4.3	<p>It states 'On completion of the engineering change project, it is the RU's responsibility to ensure that the vehicles are operated in accordance with the relevant provisions of the verification.'</p> <p>How will RU know? Is there a missing link ie ECM must advise any restrictions or provisions?</p>	Words to reflect that If the ECM has returned the vehicle to operation surely the RU can assume there are no provisions unless advised by the ECM?
9	46	G6.6.1	It states: It is good practice for vehicle owners, RUs and ECMs to manage the supply chain to ensure that changes or improvements to products fitted to rail vehicles are controlled;	Not sure what the intent is here – what is meant by controlled?
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