Joint Technical Input Endorsed by European Rail Associations

Section 8 of Annex I of Regulation (EU) 2026/1184

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I. Introduction

Many sections of the European rail network need refurbishment and maintenance either now or in the coming years. Whilst this will secure the future performance of rail traffic in Europe, it is currently leading to such severe restrictions in some countries that rail services are performing so poorly that customer needs can no longer be met. A balance must therefore be found between infrastructure renewal and the provision of attractive services for customers during Temporary Capacity Restrictions (TCRs).

The FTE Paper is intended to elaborate the operational stakeholders' perspective within the framework of the common project. It complements the joint work realized in the RNE Taskforce by providing the consolidated technical input of infrastructure users and reflecting their business requirements and expectations.

Annex I.3 already describes how construction and maintenance works have to be coordinated by IMs at international level and how railway undertakings (RUs[1]) have to be informed and consulted. We expect Annex I.8 to provide a uniform Europe-wide solution regarding how train paths and capacity specifications that have already been allocated, but which are subsequently affected by construction and maintenance works, must be rescheduled by IMs. The process is intended to apply to all types of TCRs (high, major, medium and low) for which a traffic solution has not already been drawn up in the annual timetable process (or other path planning processes). While the present annexes consider that only low-impact TCRs could give rise to such a situation, it appears appropriate to take into account more TCR categories given that infrastructure managers are not always able to include greater impact TCRs in the annual timetable.

In addition to a process for rescheduling initiated by infrastructure managers (path alteration), a standardised process must also be defined for changes initiated by railway undertakings or applicants (path modification).

We welcome DG MOVE's decision to revise Annex I.3 at the same time. On the one hand, there will be a need for adjustments due to new rules set up in Annex I.8; on the other hand, the current Annex I.3 has weaknesses that could also be addressed on this occasion.

The following overview sets out the possible changes (marked in green) and the future content of the two annexes (1 numbers correspond to subheadings in chapter II):

[1] In this text RUs is used for all operational stakeholders other than IMs.

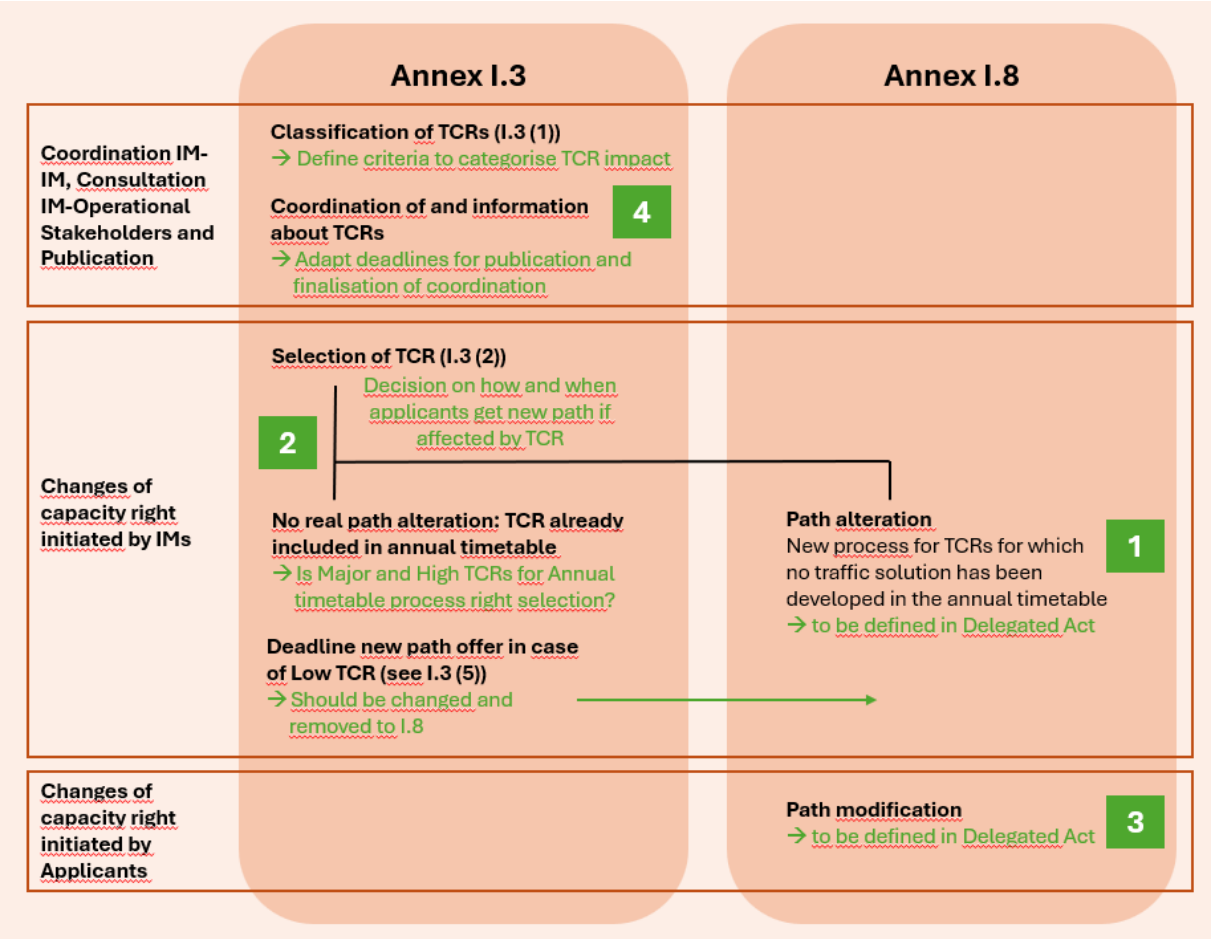


Figure 1: Structure of the proposals for changes to Annex I.3 and I.8

This paper covers only points 1 and 2, as the work on the other issues within the joint working group with RNE has not yet been started/completed. Points 3 and 4 will be submitted at a later stage during the foreseen SERAF meetings in November.

II. Proposals for changes to Annex I.3 and I.8

To ensure that the technical input is tailored to the audience and achieves its objectives, first the current problem situation is outlined and then, building on this, possible solutions for each agenda point are presented. The paper is structured according to the overview shown on previous page starting with the definition of the new path alteration process for Annex I.8.

1. Process for path alteration in Annex I.8

At present, there is no standardised European process for applicants to receive new timetables when their allocated train paths (for France also not yet allocated train paths but under study) need to be adjusted due to TCRs. Each infrastructure manager has its own

process with different deadlines and deliverables, making it almost impossible to coordinate international train paths. Furthermore, it is of the utmost importance for RUs that stable and reliable paths be allocated sufficiently in advance, thereby enabling the applicants to prepare their own production program and trains to be available for commercial sales. RUs therefore request that this gap will be closed by establishing:

- a uniform, binding process for the entire European rail network and
- a schedule that meets the applicant's needs

RUs have therefore defined key components of this new process and described them below.

The new process is based on three key principles: the Preliminary Phase, Timetable Slices, and the Frozen Zone. The relationship between these elements within the process is illustrated in *Figure 2*:

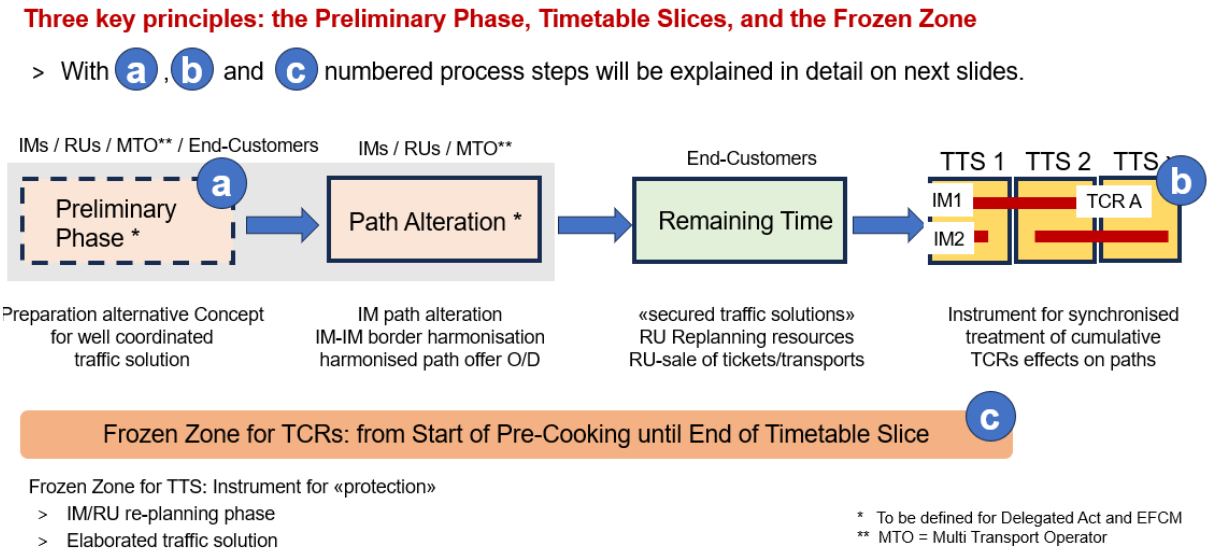


Figure 2: Key principles of the new process to be defined in Annex I.8

The following sections provide an explanation of the individual principles. The RUs would like to see these key principles embedded in Annex I.8 and/or Annex I.3 through the Delegated Act. From the RUs' perspective, the detailed description of processes should be defined within the EFCM, as this would provide the sector with a more flexible and streamlined mechanism for adapting the rules when necessary.

However, the RUs strongly insist on being actively involved in the development of the EFCMs that specify the detailed processes of Annexes I.8 and I.3. They should not merely be consulted on proposals that have already been drafted by the IMs, as the market perspective is essential from the very beginning of the drafting process. This requirement should therefore be explicitly enshrined in the Delegated Act.

a. Preliminary Phase: Common preparation of optimal Traffic solution

Current situation

RUs and IMs both face the shared challenge that each party is reliant on information from the other, and without close, iterative coordination, the creation of new timetables is suboptimal. Only the RUs can specify what resources are available to them and what customers require in detail, in order to utilise diversion routes or reschedule traffic planning. Conversely, only the infrastructure managers can provide the necessary information on which capacities are available on which diversion routes.

To date, there are no standardised rules in Europe governing cooperation between IMs and RUs before starting the alteration process, although there are already some positive examples of such cooperation on Major and High TCRs.

Suggested solution

RUs request a preliminary phase prior to the path alteration by the IMs. In the path alteration process, RUs have to carry out a lot of complementary processes in order to run the train according to the customer's wishes. This information is important for the dialogue between RUs and IMs.

That is why the RUs are calling for the introduction of a mandatory preliminary phase with clearly defined inputs and outputs, to facilitate coordination between IMs and RUs, in order to prepare for the optimal alteration of the path. *Figure 3* illustrates the importance of the preliminary phase within the overall re-allocation process:

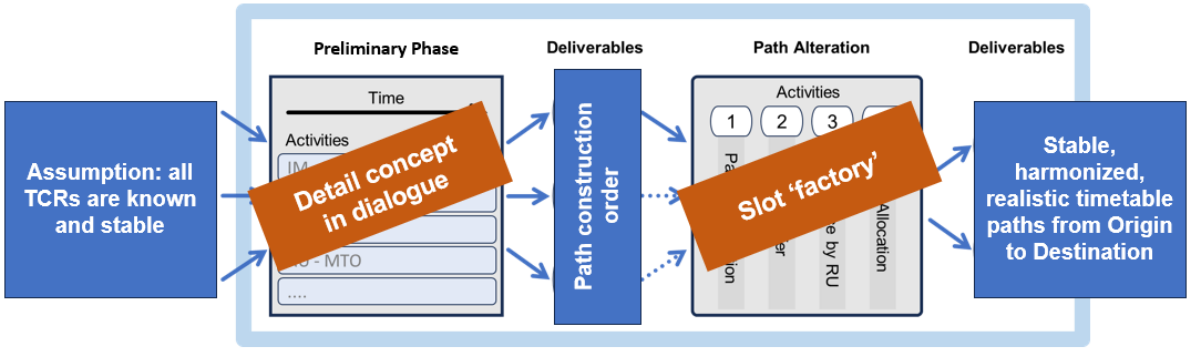


Figure 3: Preliminary phase in re-allocation process

By defining a compulsory standardised preliminary phase, the quality of the allocated alternative paths can be significantly improved, whilst the costs and workload of subsequent planning and implementation phases can be reduced.

Furthermore, the process should include the possibility for the RU to reject an alternative path or request renewed coordination if it either does not meet the end customer's requirements or is not feasible from an operational or production perspective. In assessing

whether an alternative is acceptable, the criteria used under Article 41(6) and (10) should be reflected, including the RU's ability to perform its contractual obligations, departure-time changes, increases in route distance or travel time, track access charges and other related costs. For freight services, the assessment should also reflect train-length and train-weight requirements, traction constraints, border-crossing times, terminal and service-facility slots and the integrity of the end-to-end production chain. If the offered alternative deviates significantly from the draft offer and/or the pre-construction plan, changes or cancellations must be possible and exempt from the penalties stipulated in the Commercial Conditions according to Article 42.

Concept in a nutshell:
Preliminary phase to agree by all involved stakeholders the traffic solution concepts, before starting the re-planning of the individual paths and RU resources

Proposal for legal changes

In order to introduce a compulsory standardised preliminary phase, the following provisions would need to be included in a delegated act relating to Annex I.8:

- Definition of a preliminary phase for cooperation of all involved stakeholders to define optimal use of remaining capacity taking into account customer requirements and operational constraints from all stakeholders in a balanced way. The process shall ensure equitable, transparent and non-discriminatory treatment of all types of rail transport services and shall expressly take into account the operational and commercial needs of freight and multi-network services, including continuity of the path across borders and availability of capacity in relevant service facilities.
- Definition of input and output of this phase as well as beginning, duration and end shall be harmonised across Europe and defined in EFCM. The EFCM must not permit national deviations, as this would jeopardise the positive effects.

b. Timetable Slices: Instrument to harmonize (national) paths from Origin to Destination in a synchronized way integrating all TCRs impacts

Current situation

Under the current legal framework, as set out in Annex I.3 (5), it is stipulated that, for TCRs with **Low** impact, infrastructure managers shall provide details on the offered train paths for passenger trains no later than four months and for freight trains no later than one month before the beginning of the capacity restriction (respectively in the TCRs table published in Annex I.3 (1): before starting of the train run). **Major and High** TCRs shall be included in the capacity supply and therefore in the annual timetable from the 2031

timetable onwards, in accordance with Annex I.3 (2). For all other construction and maintenance works classified as **medium** TCRs which are not already handled in the annual timetable process, there is as yet no legal provision (planning of traffic solutions in annual timetable process or in path alteration process).

As the deadlines are based on the start of the TCR, each train path is usually adjusted several times for the same day (see underlined definition above). *Figure 1* shows a below-average impact on an international train service affected by one TCR each with different start of TCR in three different countries. Analyses show that, contrary to what is shown in the figure, each train path is in fact affected by an average of three TCRs per country.

In the case of an international passenger train to which a train path has been allocated for 1 September in the annual timetable, the RU would be notified by IM 1 on 1 February that the train path needs to be adjusted, by IM 3 in mid-March, and by IM 2 again in mid-April. Where applicable, the respective adjustments may also affect border crossing times and thus the train's journey in the other countries. The RU would have to revise the train path for that particular day of operation several times, including check the availability of resources, coordinate with production partners (e.g. cooperating RUs), harmonize the re-allocated train paths with RU partners in neighbouring countries and in service facilities as well as inform customers. This process is carried out on a daily basis for a wide variety of TCRs and trains, which ties up considerable resources on both the IM and RU sides.

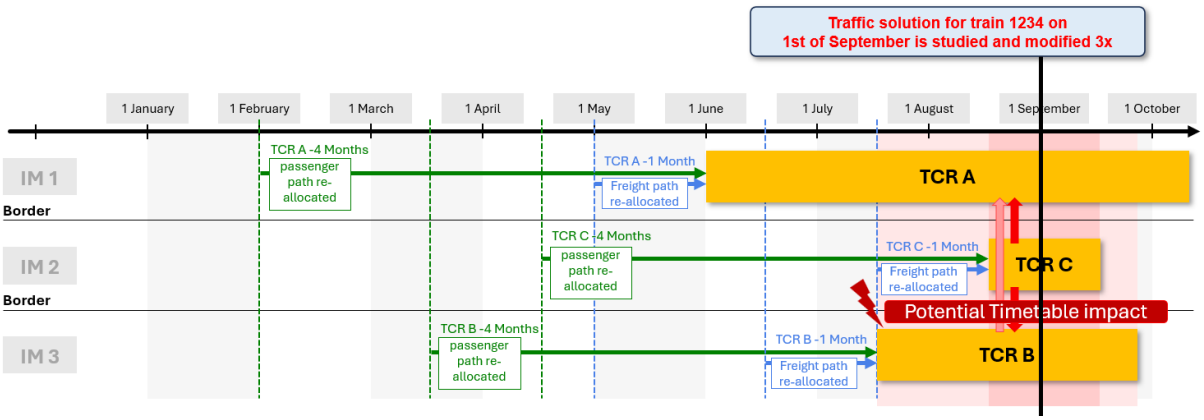


Figure 4: Multiple changes on the same path due to TCRs A, B and C

Passengers are confronted with change upon change – and currently until shortly before departure. This is not at all contributing to offering an attractive alternative for road or air travel. Please find an example what this does mean for a customer of an international night train in *figure 5*:

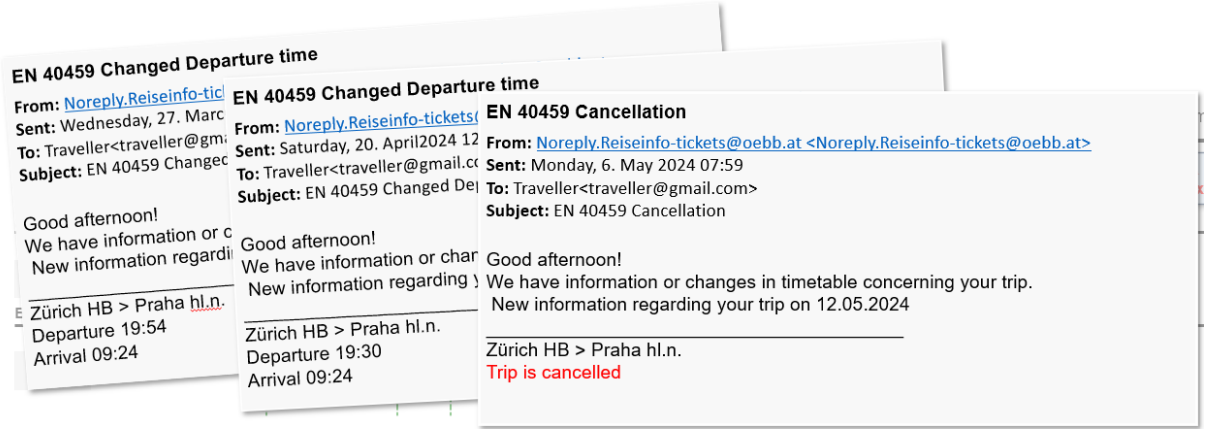


Figure 5: Multiple changes– Example night train

To make matters worse, no standardised process is described and implemented and the deadlines mentioned apply only to low TCRs. Nowadays, it can even happen that, in the case of major TCRs that have a significant impact on international train paths, neighbouring infrastructure managers resolve the same problem through different processes. For example, train paths for major diversions in Country A are already re-routed in the annual timetable, whilst in neighbouring Country B they are allocated in annual timetable as if there were no TCRs and re-routing is carried out at a later stage in the path alteration process.

Suggested solution

RUs developed a concept called “timetable slices” (TTS) as a business tool used to harmonize (national) paths of international trains by IMs at the borders and this from origin to destination in a synchronized way integrating all TCRs taking place within that time frame. At the same time, the TTS would have a beneficial impact on the reduction of the workload for IMs and RUs. Under this concept, the annual timetable is divided into standardised European timetable slices (time frames). In *Figure 6*, for example, these cover a period of 7 days. Changes to train paths are finally agreed and notified within a standardised timeframe, which is defined from the start of the timetable slice and no more from the start of each single TCR:

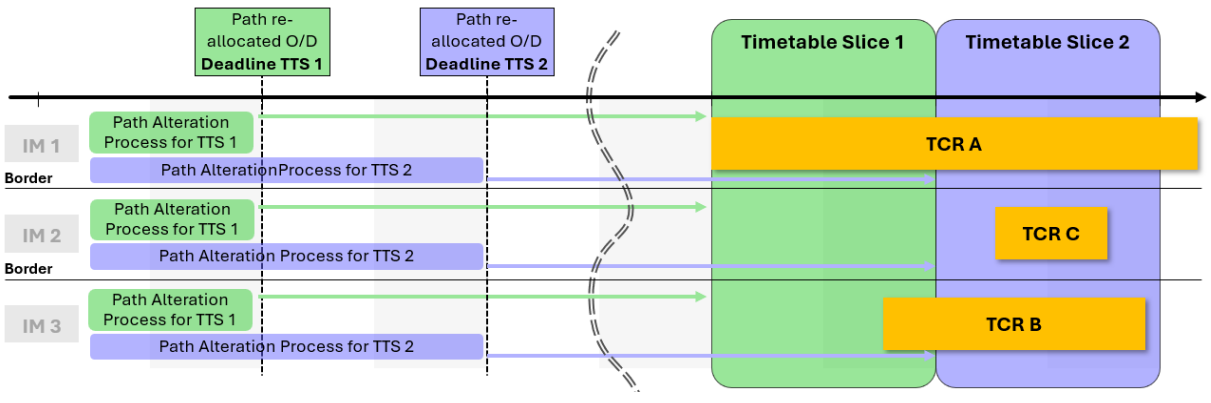


Figure 6: Concept of timetable slices

Under this approach, each train path is re-planned **once** for a specific point in time across all countries, taking into account all TCRs scheduled for that period.

Concept in a nutshell:
Timetable slices allowing IMs to re-plan the whole train journey from Origin to Destination taking the impacts of all TCRs into account at the same time

Proposal for legal changes

In order to introduce timetable slices, the following provisions would need to be included in a delegated act relating to Annex I.8:

- General principal that in annual timetable allocated paths or capacity rights should only be changed due to TCRs which are not included in annual timetable **once in one single process from origin to destination**.
- Exceptions to this process shall be limited to cases permitted by the Capacity Regulation, in particular the derogations under Article 37(5): unforeseen events requiring a capacity restriction to re-establish safe train operations; cases where the timing of the restriction is beyond the control of the infrastructure manager, its contractors or other operators acting on its behalf; or cases where all operational stakeholders concerned agree. Any exception shall be interpreted narrowly and applied in a transparent and non-discriminatory manner. To limit the use of exception provisions to the strictly necessary minimum, their application should be subject to transparent reporting. RUs call for an annual publication, including justification, within the Performance Review Board framework, as well as regular reviews by the Regulatory Bodies of both the scope of the exceptions applied and their compliance with the applicable legal requirements.
- Definition of timetable slices as **standardised European time intervals** to be used in the Path Alteration process, **each lasting at least 7 days**. The duration of the timetable slice still needs to be determined in the EFCM discussions, taking into account the requirements of both freight and passenger transport. While passenger transport must, on the one hand, be enabled to sell tickets early in line with customer expectations, the objective is, at the same time, to minimize planning effort by establishing manageable work packages for passenger and freight that facilitate the optimal utilization of infrastructure.
- All train paths within a timetable slice which needs to be altered are processed using a **uniform procedure** and within **standardised deadlines**. Procedures and deadlines are harmonised for the whole European rail network.
- Exact start and end (workday and time) as well as exact duration shall be harmonised across Europe and defined in EFCM. The EFCM must not permit national deviations, as this would jeopardise the full harmonization of the traffic solutions from Origin to Destination.

These timetable slices are supplemented by appropriate deadlines, mandatory cooperation between all stakeholders and clear responsibilities, as defined in a, c and d.

c. Frozen Zone for TCRs: Guarantee the reliability of rail services

Current situation

At present, RUs face the challenge that timetables offer no reliability whatsoever. Changes and cancellations right up until the day before the service are not uncommon and result not only in considerable operational efforts but, in particular, in massive customer dissatisfaction. This jeopardises the competitiveness of rail as a mode of transport and leads to a shift in freight and passenger traffic towards road, sea / inland waterways and air transport.

Repeated rescheduling due to the constant addition of new TCRs disrupts day-to-day work and leads to an increase in the workload that is becoming almost impossible to manage in some Member States.

Suggested solution

RUs are requesting a "Frozen Zone" defined as a period of time during which no more changes to an already planned TCR or the planning of new TCRs *with commercial impact* are allowed. *Figure 7* illustrates the "Frozen zone" using the previous example:

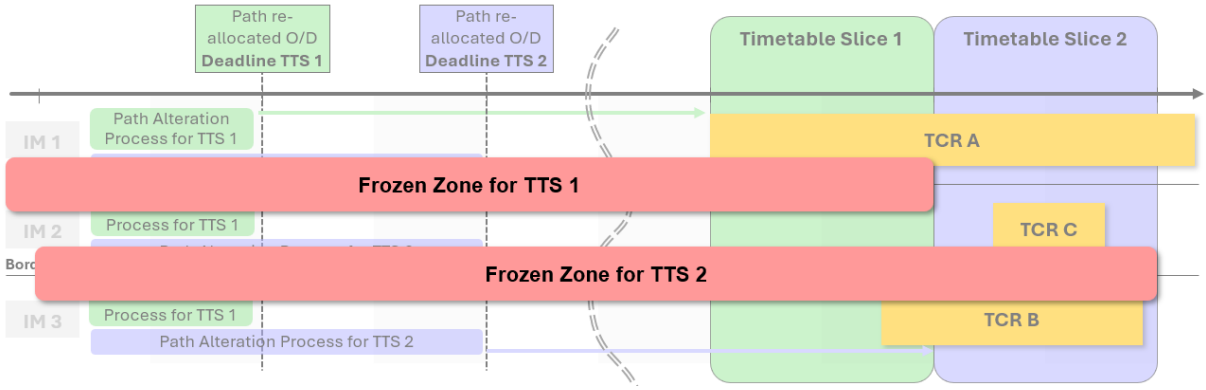


Figure 7: Illustration of frozen zone

The "Frozen Zone" is required in order to provide freight and passenger customers with reliable timetable information. Furthermore, the "Frozen zone" is also a prerequisite for the start of rescheduling between infrastructure managers, railway undertakings and Multimodal Transport Operators. Only on the basis of a stable foundation can a lot of working hours necessary to re-plan paths and re-adjust production plans (locomotives, train compositions, staff, etc.) be invested wisely to produce reliable results and avoid duplication of effort. The anchor point for the "Frozen zone" is the end of the relevant timetable slice, so that defined lead times can also be guaranteed for train paths at the end of a timetable slice.

In order to be competitive with air travel for passenger transport, the sale of fixed transport services is requested by draft EU Rail Ticketing Regulation at least five months in advance. Freight customers may have different commercial lead times, but freight services are embedded in industrial and logistics chains and depend on coordinated train paths, terminal and service-facility capacity, rolling stock and staff. Planning freight transport at a later stage would therefore put freight transport at a structural disadvantage and complicate the re-planning process as a whole. We need a stable planning basis for passenger and freight transport and therefore changes should no longer be permitted after the start of the re-planning phase, except in the cases permitted by the Regulation. For that reason, passenger and freight transport should be planned simultaneously and should apply the same deadlines; the common deadline must not result in passenger capacity being fixed first and freight transport being relegated to residual capacity.

The "Frozen zone" should therefore be defined in a standardised manner and, in addition to the stable offering phase for transport services, should also encompass the path alteration process and the key step in the iterative planning process between IM-RU called "Preliminary phase" (conceptual planning phase). *Figure 8* illustrates the various phases of the "Frozen zone":

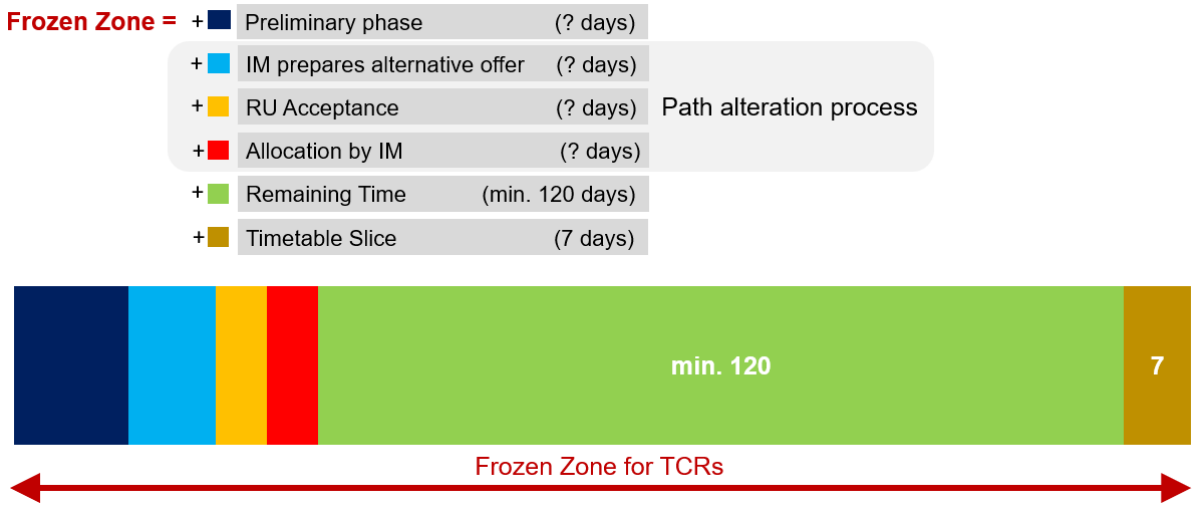


Figure 8: Frozen zone for TCRs

Only if the "Frozen zone" includes all the phases mentioned in the figure above the objectives of stability and reduced effort can be achieved in the long term. The minimum 120 days period with no subsequent path alteration allows RUs to organise and optimize their operation, while marketing the service (for passengers, intermodal or single wagonload carriers) without risking customers dissatisfaction.

The **Frozen Zone** therefore comprises two distinct aspects:

- First, there is a stable re-allocated train path (i.e. a traffic solution) available at the latest 120 days before the start of the TT slice concerned. The railway sector will work on an achievement of a more ambitious threshold in the future. In this case,

the new train path is "frozen" to enable ticket sales in passenger transport (in the picture called remaining time).

- Second, there is an earlier phase in which the TCR planning must already be frozen in order to allow for reliable replanning. During this phase, the TCRs itself which are relevant for the replanning process are "frozen."

Together, these two phases define the full duration of the Frozen Zone. This can also be expressed as a deadline, from which onwards no further changes to the infrastructure works planning are permitted.

Late TCRs must remain possible where the conditions of Article 37(5) are met and must be communicated and coordinated as soon as possible. A purely economic or budgetary reason, in itself, should not justify a late TCR outside those derogations. The use of derogations must not systematically transfer the commercial or operational burden to one type of rail transport service, in particular freight transport.

Concept in a nutshell: Planning stability → Stable offer
Frozen Zone for TCRs safeguarding a) the re-planning phase and b) the new re-planned traffic solution with alternative path allocated at least 120 days before the beginning of timetable slice

Proposal for legal changes

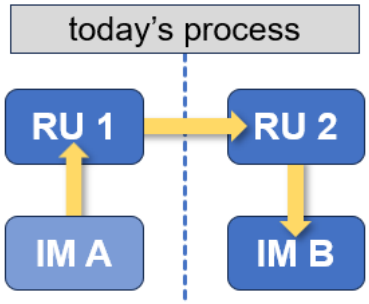
In order to introduce a “Frozen zone”, the following provisions would need to be included in a delegated act relating to Annex I.8:

- Definition of frozen zone as period of time in which no more changes to an already planned TCR or the planning of new TCRs *with commercial impact* are allowed.
- Anchor point for the frozen zone is the end of the relevant timetable slice.
- Frozen zone includes preliminary planning phase, phase of path alteration, phase for stable offer to the customer and period of timetable slice.
- Subject to the legal basis and limits of Articles 11(9) and 41(11), the deadline for the definitive re-allocation of alternative paths should be changed to one harmonised deadline of at the latest 120 days for Passenger and Freight trains prior to the beginning of the timetable slice. The railway sector will work on an achievement of a more ambitious threshold in the future. Any corresponding transfer of rules from Section 3 to Section 8 of Annex I must be made through the appropriate delegated-act provisions and must preserve simultaneous and non-discriminatory planning of passenger and freight services. The deadline is valid for all TCRs not handled in the annual timetabling process.
- Exact duration of the different phases named in figure 8 shall be harmonised across Europe and defined in EFCM and respect in any case the minimum of 120 days for the period during which path alteration is prohibited. The EFCM must not

permit national deviations, even in justified cases, as this would jeopardise the positive effects provided by the standardized process solution.

d. Responsibilities: Definition of one lead IM

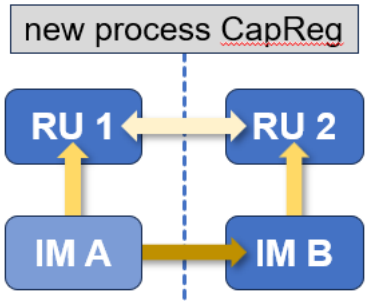
Current situation



Nowadays, international coordination of timetable changes initiated by infrastructure managers is almost always organised and carried out by the RUs. The infrastructure manager planning a TCR during the running timetable, thereby causing a change to the train path, informs the RU which ordered the path in its own country of the change. The RU then passes this information on to its production partner abroad; the RUs agree on a new production plan, and, on the basis of this new plan, the partner RU abroad initiates a change of the train path in the neighbouring country if necessary, using the process path modification.

Although the RU is not responsible for the change, it must undertake a wide range of tasks in order to ensure that, once the alteration by all IMs is complete, the paths are once again fully harmonised at an international level.

Suggested solution



Going forward, the RUs expect that the concept newly introduced in Article 41 (7) of the Capacity Regulation will lead to a reversal of responsibility. The responsible infrastructure manager shall be responsible for ensuring that, following the alteration, an alternative path is offered well-coordinated IM-IM from origin to destination. The RUs contribute by putting forward their requirements and restrictions, but they do not take any more the responsibility for the overall coordination and for the involvement of other affected IMs (also in case of more than one national IM).

The RU stays responsible for the coordination with its production partners.

Concept in a nutshell:
One responsible IM as overall coordinator will improve process for RUs

Proposal for legal changes

In order to underline the new concept described in article 41 (7) of capacity regulation, the following provisions would need to be included in a delegated act relating to Annex I.8:

- Insert a cross-reference to Article 41(7), emphasising that this article applies during the whole path alteration process including preliminary phase.

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2. Changes of Annex I.3 connected to Annex I.8

To implement the changes described in chapter 1 two changes of Annex I.3 are inevitable. These are explained in this chapter.

a. Selection of TCRs: Annual Timetable vs. Path Alteration

Current situation

The decision as to whether a traffic solution for a path affected by a TCR is to be regulated in the annual or in the running timetable is currently taken by each infrastructure manager in accordance with its own national rules. There is as yet no valid European legal framework. This leads to the problems already described in point 1 (b), which severely impair the railway undertakings' services.

The RUs therefore welcome the fact that, when Annex VII was transferred to Annex I.3, a clear provision was laid down in paragraph 2. Accordingly, all TCRs with 'Major' and 'High' impact will in future be regulated in the annual timetable.

However, we would like to point out that even construction works lasting 7 days and resulting in a capacity loss of up to 50% (category: low TCR) on heavily used lines can have such serious consequences that arrangements made during the running timetable in accordance with the new Annex I.8 will not lead to satisfactory results. In case this low categorized TCRs is treated during the Path Alteration process, it needs to be discussed in a preliminary phase how to already safeguard the needed capacity. It depends on the point of time of the low TCRs, begin/mid/end of the TT period. If capacity on alternative lines has already been allocated, there is little that can be done during the timetable year.

Article 41(11) requires the Commission, by 12 December 2027, to adopt delegated acts amending Section 8 of Annex I with a view to ensuring efficient adaptation and rescheduling processes and expressly requires the Commission to consider rescheduling windows for smaller works not categorised as having major, high or medium impact. Annex I.3 currently requires major and high TCRs to be included in the Capacity Supply Plan, while specific lead-time rules are laid down for low-impact TCRs. The treatment of medium TCRs should therefore be clarified so that there is no ambiguity as to whether the

traffic solution is to be dealt with in the annual-timetable process or under the path-alteration process.

Suggested solution

In any case, there must be a clear, uniform European principle governing which TCR category is handled according to which process, so that affected train paths are reallocated internationally harmonised from origin to destination. In order to minimise the workload for everyone and to keep processes clear and straightforward, the RUs are calling for there to be only two different processes: either detailed traffic solution is already planned in the Annual Timetable process or it is realised in accordance with Annex I.8 in the Path Alteration process. A third (new) process should not be established. A decision must therefore be made as to which of the two path planning processes Annual Timetable or Path Alteration should be used to deal with Medium TCRs. RUs consider that these should be dealt with under the process set out in Annex I.8 of the Path Alteration. *Figure 9* points out that there is no third process in between Annual Timetabling process and Path Alteration process:

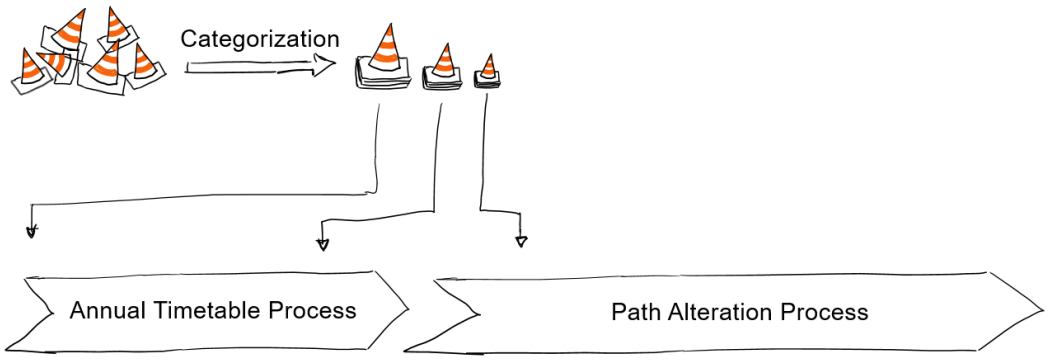


Figure 9: Selection of TCRs

To address the issue that the categories defined in Annex I.3 (1) do not always reflect the actual impact of a TCR, RUs and IMs should be able, by mutual agreement, to deviate from the rigid rules. This rule should make it possible to deal with both high and major TCRs in the Path Alteration process – and thus downgrade them – as well as to upgrade medium and low TCRs, in order to develop traffic solutions earlier in the annual timetable.

Concept in a nutshell:
Two dedicated processes for categorized TCR's - either in the annual timetable or via a path alteration pursuant to the new Annex I.8

Proposal for legal changes

In order to unambiguously assign TCRs to one of the two alternative processes for implementing traffic solutions for train paths affected by TCRs, the following provisions should be addressed through the delegated-act mechanism applicable to Section 3 of Annex I,

in particular Article 11(9), coordinated where necessary with the delegated act under Article 41(11) for Section 8:

- Clear definition that Major and High TCRs are included in capacity supply plan and by that a traffic solution for TCR affected path is already defined in annual timetable.
  Once decided that Major and/or High TCRs are included in capacity supply plan, then all IMs must follow this key rule. That means concretely: not only the IM who is triggering the TCRs must elaborate the TCRs Variants for the traffic solutions in Capacity Supply and in the Annual Timetable, but also all other affected neighbouring IMs must apply the same rule.
- Clear definition that for all other TCRs RUs receive traffic solutions for already allocated paths and capacity rights that are affected by these TCRs according to the new alteration process defined in Annex I.8
- Inclusion of possibility of derogation in case of mutual agreement between the IMs and RUs concerned. (Note: Mutual does mean that all stakeholder which are affected agree to the solution and should not be suggested as given by accepting the Network Statement.)

b. Deadline new re-allocated path for low TCRs

Current situation

The existing rule from Annex VII has now been incorporated into Annex I.3 (5), stipulating that, in the case of low-impact TCRs, the amended train paths must be allocated a defined period in advance of the start of the TCR. For passenger services, this is four months before the start of the TCR, and for freight services, one month before the start of the TCR. As already described in section 1(b), this means that a train affected by several TCRs is repeatedly assigned a new timetable at different times. In additions there is the risk that if on high utilised line passenger and freight paths are not re-planned at the same time, but freight paths will be re-planned in a second step, then the re-planning of freight paths could impact negatively the already re-planned and re-allocated passenger paths.

Suggested solution

As already described in section 1 (b), planning for passenger and freight transport should take place simultaneously and with greater lead time, so that reliable tickets can be sold for passenger services at a time which ensures competitive with other modes of transport and the freight customers could adapt their production chain in the factories where possible. Furthermore, the start date should be aligned with the timetable slice rather than the start of each single TCR, in order to prevent multiple changes to the same train path.

Furthermore, this section should be transferred to Annex I.8, as it deals with the path alteration in the running timetable. Annex I.3 should only contain those points relating to the coordination and information of TCRs for the annual timetable.

Proposal for legal changes

After implementation of Annex I.8 the definition of deadlines to allocate alternative paths will be included in this section. As explained under 1 (b) the following change is needed:

- Subject to the legal basis and limits of Articles 11(9) and 41(11), the deadline for allocation of alternative paths should be changed to one harmonised deadline of at the latest 120 days prior to the beginning of the timetable slice. The railway sector will work on an achievement of a more ambitious threshold in the future. The legal drafting must ensure that the corresponding rules in Sections 3 and 8 of Annex I are coherent and that passenger and freight paths are re-planned simultaneously, without treating freight as residual capacity.

III. Management Summary

(1) A binding, harmonised European process must be established under Annex I.8 to reschedule train paths affected by Temporary Capacity Restrictions (TCRs), ensuring consistent solutions from origin to destination.

(2) Standardised timetable slices should enable all TCR-related changes involving a single limited period of time to be processed once within common European deadlines, significantly reducing repeated adjustments and workload for infrastructure managers and railway undertakings.

(3) A frozen zone, including a harmonised at the latest 120-day deadline for alternative path allocated, after which path alteration is prohibited, is essential to guarantee timetable stability, reliable commercial information and greater customer confidence.

(4) A mandatory preliminary phase and clearly assigned leadership to the responsible infrastructure manager should improve coordination, balance operational constraints and customer needs, and deliver better-quality alternative paths. The process should explicitly safeguard equitable, transparent and non-discriminatory treatment of freight, inter-urban passenger and urban/regional passenger services and preserve the integrity of multi-network freight paths and their links to terminals and service facilities.

(5) Annexes I.3 and I.8 must clearly define two complementary processes: Major and High TCRs should normally be addressed in the annual timetable, while Medium and Low TCRs should follow the running-timetable alteration process, with limited derogations by mutual agreement.

(6) Harmonised deadlines for TCRs re-allocated according to Annex I.8: RUs propose that alternative passenger and freight paths be allocated simultaneously, at latest 120 days before the start of the timetable slice, to avoid repeated re-planning.
(7) Transfer to Annex I.8: Rules concerning path alterations during the running timetable should move from Annex I.3 to Annex I.8. Annex I.3 would then focus solely on TCR coordination and consultation for the annual timetable.