

East Coast responses to the Consultation on the Railways and Other Guided Transport Systems (Miscellaneous Amendments) Regulations

(Responses highlighted in yellow):

Question 1: Do you have any comments on ORR's role as certification body? If so, please state.

None

Question 2: Do you have any comments on the proposed new regulation 4(4A) of EARR? If so, please state.

None

Question 3: Do you agree with the proposed approach for carving out specific railway systems from the mainline railway requirements in ROGS through the use of an Approved List? Please explain your answer.

Agree with proposal, use of an Approved List will provide greater clarification as to who is excluded from the mainline requirements

Question 4: Are there any systems that should not be on the Approved List? Please identify them if so and explain why they should not be exempted.

None

Question 5: Are there any systems that are not on the Approved List that should be? Please identify them if so and explain why they should be included.

None

Question 6: Do you agree with the proposal to issue one safety certificate instead of two? If not, please explain why.

Agree

Question 7: Do you agree with the proposal to remove from ROGS the requirement for mainline operators to carry out safety verification? Please explain your answer.

Yes – cannot see the logic or need for adopting two 'assessment' processes.

Question 8: Do you agree with the proposal to make the 28-day consultation period run concurrently with ORR's four month processing time? Please explain your answer.

Yes – there is no reason why both processes should run concurrently with ORR reviewing comments in the early stages of their formal assessment.

Question 9: Do you agree with the proposal to remove the requirement for non-mainline operators to submit annual safety reports to ORR? Please explain your answer.

Yes – removes an un-necessary burden on non-mainline operators.

Question 10: Do you agree with the proposal to clarify that the monitoring arrangements of the controller of 'safety-critical work' have to be suitable and sufficient? Please explain your answer.

Yes – further clarification is necessary and welcome.

Question 11: Do you have any other comments in relation to the issues raised in this consultation document (and annexes)?

None

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23/10/2012