

27//10/2015

To
Ms. Tracy Phillips

Office of Rail and Road
One Kemble Street
London
WC2B 4AN

CROSSRAIL TRAIN PROTECTION (PLAN B) - RAILWAY SAFETY REGULATIONS
1999 EXEMPTION APPLICATION

Dear Ms. Phillips

I write with the reference to the above consultation. I thank you for the opportunity to comment.

I am responding to the consultation on an individual basis as an ex-electrical systems business manager and a system safety professional.

My experience and details are listed in a brief form later in the text.

There is insufficient investment of attention and effort into understanding the interactions between technical, organisational and human factors within the Exemption Application. The call for such inclusion has been made belatedly made by the European Railway Agency as well. Based upon the human factor, system engineering, and safety engineering analysis contained in this Submission and my professional understanding of the intent of the Common Safety Method, Inter-operability Directives and the 1999 RSR I have to recommend to the ORR that that the said application must be rejected. It deviates from the intent of the CSM and the 1999 RSR.

Signed/

Yours sincerely

Sanjeev Kumar Appicharla

System Safety Engineer-Ex RSSB (2004 till 2010)

Email contact: appicharlak@yahoo.co.uk

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- 24 Jan 2010 v1 (Initial Draft submission to RSSB and IET Consultation on merging of HSAW and ROGS)
 - 22 November 2010 v7 (Revised Draft submission to Law Commission on Level Crossings Consultation)