



Delay Attribution Board  
Floor 8  
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**To:** Gerry Leighton,  
Head of Stations, Depots and  
Network Code  
Office of Rail and Road  
One Kemble Street  
London  
WC2B 4AN

**Tel:** ✂  
**Email:** ✂

**cc:** Richard Morris  
Chairman,  
Delay Attribution Board.  
Margret Child - ORR

**Date:** 19<sup>th</sup> March 2018

## **Submission of proposals for amendment to the January 2014 Performance Data Accuracy Code**

Dear Gerry,

I am writing to seek ORR approval on a Proposal for Amendment to the Performance Data Accuracy Code (PDAC) in accordance with Track Access Condition B2.7.2.

Please find appended to this letter details of the PDAC Proposals for Amendment:

The detail provided for the proposal consists of the following information:

- 1** The Proposal for Amendment as Consulted (marked up version as distributed)
- 2** The industry responses to the Proposal for Amendment and the Board's considerations and decision on those responses from the industry
- 3** The Proposal for Amendment as amended (post consultation - clean version)
- 4** The supporting RPCR templates.

The proposals for amendment to the PDAC were put out to Industry Parties for formal consultation in accordance with Track Access Condition B2.5.2. The deadline for Industry responses was the 23<sup>rd</sup> February 2018. A number of Industry Parties responded to the consultation process and these responses are included in this submission.

Being the PDAC has not been amended since January 2014 and the number of changes therefore proposed the PDAC was sent out as one document with all changes explained and highlighted rather than individual proposals.

All decisions made by the Board have been unanimous. A copy of the minutes of the meetings where the proposed amendments were agreed is available should you require it.

I await your advice on whether you approve the amendments proposed.



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Finally, in accordance with Track Access Condition B2.7.1, the Board has agreed that any amendments approved by the Regulator should come into effect on 1st June 2018. This will allow appropriate briefing material to be produced and delivered for its release.

Should you wish to discuss any aspect of this submission please do not hesitate to contact me as detailed above.

Kind regards,

Mark Southon

Board Secretary

**Schedule of amendments to the January 2014 Performance Data Accuracy Code**

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| Originators Reference Code / N <sup>o</sup>     | <b>DAB PDAC P01</b>  |
| Name of the original sponsoring organisation(s) | DAB  |
| Exact details of the change proposed            | <p><b>To amend to PDAC as per the attached document.</b><br/>(Additions and amendments are shown in red text for ease of referencing)</p> <p><u>Overview of changes being proposed:-</u></p> <p><b>1 Definitions</b><br/>Current definitions have been improved and new definitions have been included as deemed required.</p> <p><b>2 Purpose of the Code</b><br/>Retitled Section (previously entitled ‘Aims’)<br/>New paragraphs 2.1 and 2.2 have been added to cover the purpose of the Code.<br/>Paragraph 2.3 is formulated from the old 3.2 with an element of 3.1 incorporated.</p> <p><b>3 Performance Reporting Framework</b><br/><br/>Retitled Section (previously entitled ‘effects of the Code’)<br/>New Paragraph 3.1 has been added setting out TRUST data recording inputs.<br/>Paragraph 3.2 is the old 4.1 setting out characteristics of a Recording Point (moved to a more appropriate section)<br/>New Paragraph 3.3 has been added setting out the three types of Recording Points.<br/>New Paragraph 3.4 has been added setting out schedules, types of locations and requirement to record locations.<br/>New Paragraph 3.5 has been added and covers missed Recording Points.<br/>New Paragraphs 3.6 to 3.8 have been added which set out previously provided DAB guidance on non-TRUST data sources.</p> <p><b>4 Completeness and Accuracy</b><br/><br/>Retitled Section (previously entitled ‘Characteristics of Recording Points’)</p> |

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|  | <p>Paragraph 4.1 is the old 3.9 moved to a more appropriate section covering presumed accuracy.<br/>         Paragraph 4.2 is the old 3.4 moved to a more appropriate section covering omission and later input of train times.<br/>         Paragraph 4.3 is the old 3.7 moved to a more appropriate section covering accuracy and subsequent challenge.<br/>         Paragraph 4.4 is the old 3.8 moved to a more appropriate section covering action to take where data is found not to be accurate.<br/>         Paragraph 4.5 is the old 4.2 moved to a more appropriate section and referencing Appendix A.<br/>         Paragraph 4.6 is the old 4.3 moved to a more appropriate section and referencing Appendix B.</p> <p><b>5 Margin Books</b></p> <p>Paragraph 5.3 has been simplified and shortened as the Margin Book reflects what is agreed.</p> <p>Paragraph 5.4 has been simplified and shortened reflecting the proposed removal of the outdated and little understood Gold and Silver locations and replaced with the standard CMP, DRP and TP (see Appendix A for details)</p> <p><b>6 Changes to Characteristics to Recording Points</b></p> <p>Paragraph 6.1 is part of the old 6.2 with an element of the old 6.1 incorporated, simplifying this element.<br/>         Paragraph 6.2 is a new addition covering material impact and neutralisation.<br/>         Paragraph 6.3 incorporates an element of the old 6.2, separated out for clarity.<br/>         Paragraph 6.6 has been reworded for improved clarity<br/>         Paragraph 6.7 is a new addition covering General Approvals</p> <p><b>7 Accuracy of Recording Points in the Performance Monitoring System</b></p> <p>Retitled Section (previously entitled 'Review of Standards')</p> <p>Paragraph 7.6 is a new addition and relates to response times for timing changes.<br/>         Paragraph 7.7 is simply the old 7.6.<br/>         Paragraph 7.8 is a new addition covering where the Recording Point is a Monitoring Point – not previously covered in PDAC.<br/>         Paragraph 7.9 to 7.11 are all new additions covering notice periods, required notification and responses to changes not previously covered in any detail.</p> |
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|  | <p><b>9 Revisions to the Code</b></p> <p>No changes have been made to this section</p> <p><b>10 Dispute Resolution</b></p> <p>No changes have been made to this section</p> <p><b>11 Good Faith</b></p> <p>No changes have been made to this section</p> <p><b>APPENDIX A – DATA COMPLETENESS STANDARD</b></p> <p>Part B – ‘Other Failures’ has been completely rewritten:-</p> <p>SUPER GOLD / GOLD / SILVER terminology has been replaced with the standard (and widely understood) CMP / DRP / TP</p> <p>The colours were deemed as being outdated and meaningless given their current usage round the network. The importance of the location is signified by the CMP, DRP, TP titles.</p> <p>An additional element has been incorporated to stipulate Network Rail Routes should be keeping records of the locations, recordings due and made and actions being taken.</p> <p><b>APPENDIX B – TIMMING STANDARD</b></p> <p>Appendix B has been completely rewritten as feedback suggested Industry did not actually understand what was being set out within this Appendix.</p> <p>Therefore it is proposed to remove the Blue / Orange categorisations which are deemed outdated and not understood by Industry</p> <p>Appendix B has therefore been replaced with a full written description and prescription of what is required in terms of:-</p> <ul style="list-style-type: none"><li>• Reviewing Locations</li><li>• Undertaking Audits</li><li>• Keeping Records</li></ul> |
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|                       | <p>These areas are all deemed more useful and appropriate for managing the process currently and certainly moving into CP6.</p> <p><b>APPENDIX C - PROCESS FOR AMENDING BERTHING OFFSETS</b></p> <p>Appendix C has been updated as to reflecting the recent ORR name change plus includes a note relating to template organisation posts (or not) in Network Rail Routes.</p> <p><b>APPENDIX D – RECORDING POINT CHANGE REQUEST</b></p> <p>The opportunity has been taken to review and update the RPCR template form previously set out in Appendix D.</p> <p>This has now been reviewed and developed into various forms to do specific identified activities required to keep the processes working rather than trying to use one template to do all those different activities. This includes New Works, No Change Required, Timing Point, Location status change, DRP/CMP.</p> <p>Additionally, it is proposed to remove the RCPR template form(s) from the PDAC itself and put onto the DAB website for ease of access and future management.</p> <p>Appendix D therefore now lists the various forms, where to find them and most importantly what to use them for.</p> <p>The forms themselves being outside the PDAC means the Board can review and amend the layout of the forms without full Industry Consultation (given they only enable delivery and compliance to the standard and do not change the standard which remains fully in the PDAC itself).</p> |
| Reason for the change | <p>Through 2017 the DAB conducted a review of the PDAC which was last updated in January 2014.</p> <p>The purpose of the PDAC review was to:-</p> <ul style="list-style-type: none"> <li>• Improve readability and referencing.</li> <li>• Improve clarity of application and requirements.</li> <li>• Bring it in line with Industry needs for CP6.</li> <li>• Take into account previous Industry feedback.</li> <li>• Remove elements deemed outdated or not required.</li> </ul>  |



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|  | <ul style="list-style-type: none"><li>• Tighten up and clarify data quality stipulations and control.</li><li>• Correct the version control issues within the previous 2014 release.</li></ul> <p>This Proposal for Amendment therefore looks to address the elements above.</p> <p>It was intended to consult the changes in their component parts but as many of the changes are interlinked the consultation has necessitated the requirement to consult the full document.</p> |
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**Consultation closed 28 February 2018**

**Response Matrix**

| Proposal reference Number: | PDAC/P01                            |
|----------------------------|-------------------------------------|
| Abellio Greater Anglia     |                                     |
| Arriva CrossCountry*       | <input checked="" type="checkbox"/> |
| Arriva Rail Northern*      | <input checked="" type="checkbox"/> |
| Arriva Trains London       |                                     |
| Arriva Trains Wales*       | <input checked="" type="checkbox"/> |
| Chiltern Railways*         | <input checked="" type="checkbox"/> |
| Colas Rail                 |                                     |
| DB Cargo                   |                                     |
| DB Regio Tyne & Wear       |                                     |
| Devon & Cornwall Railways  |                                     |
| Direct Rail Services*      | <input checked="" type="checkbox"/> |
| East Midland Trains        |                                     |
| Eurostar International     |                                     |
| First Greater Western      |                                     |
| First Transpennine         |                                     |
| Freightliner HH            |                                     |
| GB Railfreight             |                                     |

| Proposal reference Number:   | PDAC/P01                            |
|------------------------------|-------------------------------------|
| Govia Thameslink Railway*    | <input checked="" type="checkbox"/> |
| Grand Central Railway*       | <input checked="" type="checkbox"/> |
| Harsco Rail                  |                                     |
| Heathrow Express             |                                     |
| Hull Trains                  |                                     |
| West Midlands Trains         |                                     |
| Merseyrail*                  | <input checked="" type="checkbox"/> |
| MTR Crossrail                |                                     |
| NEXET Trains Ltd (c2c Rail)  |                                     |
| North Yorkshire Moors        |                                     |
| Scotrail*                    | <input checked="" type="checkbox"/> |
| Serco Caledonian Sleepers    |                                     |
| Southeastern Trains          |                                     |
| Stagecoach South West Trains |                                     |
| Virgin Trains (West Coast)*  | <input checked="" type="checkbox"/> |
| Virgin Trains East Coast     |                                     |
| West Coast Railway Company   |                                     |
| Network Rail                 | <input checked="" type="checkbox"/> |

\*Response through DAMG



| PDAC/P01 Response  | Comments   |
|--|--|
| <p>DAMG - on behalf of the identified companies in the response matrix</p> | <p>Accept the Proposal with caveat as below:-</p> <p>The below new sections of the PDAC has criteria which are new and have a material impact. It has previously been discussed and agreed at DAB that subthreshold delays due to the nature of berth offsets are not as accurate as above threshold delays. As such where known disruptive operational conditions occur subthreshold delays will transpose from between timed locations and create false delay. Common examples of this are times measured using converging junction signals that provide arrival times at stations; a train passing the signal at line speed will take a different duration to reach the station than one starting from a stand, but both have the same berth offset applied. This acknowledged in 3.6 (b) &amp; (e), yet 3.7 prevents this information from being utilised to accurately allocate the time loss to the correct cause.</p> <p>PDAC only allows for the use of this data to correct Berth offsets where an error has occurred. In the case cited the Berth offset error only occurs in times of disruption.</p> <p>By adding an additional sentence to 3.7 allowing the accurate and correct allocation of delays to the cause identified through 3.6 (a) the use of outputs from data systems such as CCF and GPS can be utilised for the purpose of performance improvement and no material change will be caused by this PFC.</p> <p><b>3.6 Data captured outside the Performance Monitoring System (such as GPS) should be used for:</b></p> <p>(a) Establishing whether a train actually ran (i.e. cancellations) and assisting delay cause investigation – i.e. in the identification of the cause of an attributed delay;</p> <p>(b) analysis of train running performance, including investigation into non-attributed delay (i.e. sub threshold delay);</p> <p>(c) as a backup source of information after system failure using Para 4.2;</p> <p>(d) providing timing data to infill manual locations and improve automation freeing up signaller time (providing the data source is</p> |

| PDAC/P01 Response | Comments  |
|-------------------|---|
|                   | <p>compliant with the take-on standard for accuracy and data completeness standards); and</p> <p>(e) providing collated evidence from multiple trains to challenge where the berth offsets in use are believed to be inaccurate (providing the data source is compliant with the take-on standard for accuracy and data completeness standards).</p> <p>3.7 Data captured outside the Performance Monitoring System (such as GPS) should not be used for:</p> <p>(a) disproving individual train recordings in TRUST (i.e. showing that a train arrived 4mins late by GPS rather than 5mins late as per the Recording);</p> <p>(b) disproving a recorded delay (i.e. showing that a threshold 3mins delay in TRUST was only 2mins using the GPS timings).</p> <p>(c) coding any part of a delay to a planned delay code (i.e. a 'P-code') when any discrepancy is on average 60secs or less. Timings already made automatically in TRUST ('Recordings') must not be amended manually retrospectively to change the train lateness and any associated delays, unless Para 4.4 applies.</p> |
| DRS               | Accepts this proposal as submitted  |
| Network Rail      | Accepts this proposal as submitted.   |
| DAB Decision      | <p>The DAB reviewed the Industry Consultation responses at its meeting of 13<sup>th</sup> March 2018.</p> <p>The DAMG comments were discussed with a Network Rail concern that PDAC must not be interpreted to allow wholesale challenge and change to TRUST times.</p> <p>The DAMG representative confirmed that is not the intention and a minor amendment was suggested and made to the proposed PDAC as below:-</p> <p>The example (bracketed) scenario set out in 3.7b will be incorporated into 3.7a with the remainder of 3.7b being deleted.</p> <p>The proposed 3.7c will then become 3.7b.</p>  |

| PDAC/P01 Response | Comments   |
|-------------------|--|
|                   | <p>3.7 a and b will now read as follows:-</p> <p>(a) disproving individual train recordings in TRUST (i.e. showing that a train arrived 4mins late by GPS rather than 5mins late as per the Recording and or showing that a threshold 3mins delay in TRUST was only 2mins using the GPS timings); or</p> <p>(b) coding any part of a delay to a planned delay code (i.e. a 'P-code') when any discrepancy is on average 60secs or less.</p> <p>A footnote will also be added to refer the user to DAPR E3.</p> <p>This amendment provided the Operator and Network Rail representatives with assurances that PDAC allows and prevents their respective concerns.</p> <p>A briefing note will also support the PDAC release.</p> <p>No other concerns were raised or amendments made.</p> |