



Delay Attribution Board
Floor 8
1 Eversholt Street
London
NW1 2DN

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.
Michael Scarff – ORR

Date: 24th June 2015

Submission of proposals for change to April 2015 Delay Attribution Guide (DAG)

Dear Gerry,

I am writing seeking approval for proposed changes to the Delay Attribution Guide in accordance with Track Access Condition B2.7.2.

Please find appended to this letter details of the following Proposals for Change:

DAB/P243 Change despatch to dispatch
NR/P171- Change Operational planning to Capacity planning
NR/P172 – Additional sectional section of 4.31.2(h)
NR/P173 – Further scenarios to section 4.8.13
NR/P175 –Additional wording in section 4.23.3
NR/P176 – Regulation of early running train matrix

The details for each proposal consist of the following information:

- 1** The Proposal for Change from the sponsor.
- 2** A list of the industry responses to the Proposal for Change.
- 3** The DAB decision and consideration of the responses from the industry.

The proposals for amendment to the Delay Attribution Guide were put out to Industry Parties for formal consultation in accordance with Track Access Condition B2.5.2. The deadline for Industry responses was 14th May, A number of Industry Parties responded to the consultation process and these responses are included in this submission.

All bar one decision (NR/P176) 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.



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I await your advice on whether you approve the amendment proposed. Finally, in accordance with Track Access Condition B2.7.1, the Board has agreed that any changes approved by the Regulator should come into effect **14th September 2015**

Should you wish to discuss any aspect of this submission or the proposals for that matter, please do not hesitate to contact me as detailed above.

Kind regards,

A handwritten signature in black ink, appearing to read 'Ana Maria Sanchez', is written over a light pink rectangular background.

Ana Maria Sanchez, BA(Hons)

PA to DA Board Secretary



Proposal reference Number:	DAB/P243	NR/P170	NR/P171	NR/P172	NR/P173	NR/P174	NR/P175	NR/P176
Company Organisation								
Abellio Greater Anglia*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Arriva Trains Wales								
c2c Rail Ltd								
Chiltern Railways								
Colas Rail								
DB Regio Tyne & Wear								
DBSchenker								
Devon & Cornwall Railways								
Direct Rail Services								
East Midland Trains								
Eurostar International								
First / Keolis Transpennine *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
First Greater Western *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
First Hull Trains								
Freightliner *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
GB Railfreight								
Govia Thameslink Railway *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Grand Central Railway*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Harsco Rail								

Proposal reference Number:	DAB/P243	NR/P170	NR/P171	NR/P172	NR/P173	NR/P174	NR/P175	NR/P176
Heathrow Express								
London Midland								
London Overground								
Merseyrail*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
North Yorkshire Moors								
Northern Rail *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Scotrail *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Southeastern Railway *	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Southern								
Stagecoach South West								
Virgin Trains (West Coast)*	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Virgin Trains East Coast								
West Coast Railway								
XC Trains								
Network Rail	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*Response through DAMG

Originators Reference Code / N ^o	DAB/P243
Name of the original sponsoring organisation(s)	DAB
Exact details of the change proposed	<p>Change all entries of 'despatch' in the DAG to read 'dispatch'</p> <p>Remove the wording 'dated 15th September 2013' from the second paragraph in the foreword.</p> <p>Amend 4.3.7.3(a) circumstances wording from 'Where there is a greases on...' to 'Where there is grease on..'</p>
Reason for the change	<p>One proposal containing alterations that are required to the DAG that are considered non material but none the less required for accuracy, consistency and grammar</p> <p>Consistency with the wording 'dispatch' throughout the DAG</p> <p>In the foreword of the DAG the previous issue is written but requires a Pfc each time. Suggested that the date is removed from the foreword and added to front cover (which can be changed by the Secretariat).</p> <p>Amendment to wording in 4.3.7.3(a) for grammatical correctness.</p>

DAB/P243

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	DAMG on behalf of the identified companies accepts this proposal.
Network Rail	Network Rail accept the proposal
DAB DECISION	The Board when reaching its decision at the 9 th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.

Originators Reference Code / N ^o	NR/P171
Name of the original sponsoring organisation(s)	Network Rail
Exact details of the change proposed	Change all references within the DAG of Operational Planning to Capacity Planning
Reason for the change	To bring the DAG in line with current organisational names

NR/P171

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	DAMG on behalf of the identified companies accepts this proposal.
Network Rail	Network Rail accept the proposal
DAB DECISION	The Board when reaching its decision at the 9 th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.

Originators Reference Code / N ^o	NR/P172			
Name of the original sponsoring organisation(s)	Network Rail			
Exact details of the change proposed	Add new 4.31.2(h)			
	No.	Circumstance	Delay Code	Incident Attribution
	h.	Short Term Plan (STP) errors in connection with a freight schedule	QM	Network Rail (QQAK)
	Add new 4.31.7			
	4.31.7 Where a freight train is provided with an Alternative Train Slot (VSTP) under the Management of Freight Services during Disruption protocol (NCI 9.1), the cancellation of the Base Train Slot should be attributed to the TRUST delay incident created for the Disruptive Event that has caused the need for the Alternative Train Slot to be implemented.			
Reason for the change	<p>This PfC is proposed to cover two common areas involving freight scheduling. They have both been part of internal Network Rail briefing but are requested to be progressed to the DAG for further visibility and understanding.</p> <p>The first part is proposed in response to requirements from the Amended Schedule Processing Manager (STP) to have all Freight schedule incidents due to Short Term Planning attributed to QQAK. This is expected to save time with internal reattribution and allow causes of incidents to be established quicker and improvement in analysis.</p> <p>The second part is in response to requirements under the revised operational protocol for managing freight services during disruption.</p> <p>One of the consequences of the implementation of MFSD is that the prime delay minutes attributed to any incident will be reduced as affected trains are provided with an Alternative Train Slot (ATS). A concern raised by a number of FOCs, and shared within Network Rail, is that this reduction in the number of delay minutes may adversely affect the ability to identify the scale of disruption caused by an incident and thus diminish any capability to build a business case for performance improvement.</p>			

	<p>Previous evidence showed that whilst this generally occurs it is not always the case, and the cancellation of the unused Base Train Slot may be attributed to FL, P* or Q* cause codes before correction. By ensuring that all such cancellations are correctly coded on the day, the impact of any incident subject to the MFSD protocol will be visible through both cancellations and delay minutes in PSS and reduction in discussions and reworking at Level 2.</p>
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NR/P172

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	DAMG on behalf of the identified companies accepts this proposal.
Network Rail	Network Rail accept the proposal
DAB DECISION	The Board when reaching its decision at the 9 th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.

NR/P173

Originators Reference Code / №	NR/P173		
Name of the original sponsoring organisation(s)	Network Rail		
Exact details of the change proposed	Add further scenarios to DAG 4.8.13:-		
	No.	Circumstance	Delay Code
	p.	Overrun of possession, due to a substandard action or inaction of a member of route operations staff (e.g. signallers, MOM's, LOM's)	15
	q.	Overrun of possession, due to the removal of staff from a worksite(s)	15
	r.	Overrun of possession, due to a substandard action or inaction of a member of NSC operations staff	15
Reason for the change	<p>Although contrary to customary practice and DAG 4.8.13 and 4.16.2 it should be noted that DAG 4.8.5 does not specify a responsible manager code for use with I5 and as such the pairing of an Infrastructure Reason Code and an Operational Responsible Manager Code (e.g operational staff such as signallers, LOMs. MOM's, controllers, etc) are not covered appropriately.</p> <p>This proposal looks to clarify that in certain circumstances possession over runs are the responsibility of operational personnel rather than the maintenance organisation but, importantly, still remain an I5 coding.</p>		



**PROPOSALS FOR CHANGE TO THE
 DELAY ATTRIBUTION GUIDE
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 Consultation closed – 14th May**

NR/P173

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	DAMG on behalf of the identified companies accepts this proposal.
Network Rail	Network Rail accept the proposal
DAB DECISION	The Board when reaching its decision at the 9 th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.

Originators Reference Code / N ^o	NR/P175
Name of the original sponsoring organisation(s)	Network Rail
Exact details of the change proposed	Additional wording in paragraph 4.23.3 (red) 4.23.3 In the event of a train being incorrectly regulated or routed as a result of a signaller correctly applying an incorrectly-produced Train Service Simplifier, the 'Minutes Delay' should be attributed to Network Rail and coded OQ/OQ**. This coding shall apply irrespective of who created the simplifier or the source of the information . The exception is when the simplifiers are produced by Capacity Planning which should be coded to (QA/QM / QQ**).
Reason for the change	Internally to Network Rail, much debate is had about the provision and accuracy of simplifiers with reasons for errors often cited as being the information source (sometimes provided by Operators) This proposal seeks to highlight that the source of information for simplifiers should not detract from the simplifier error itself. Correction to 'Capacity Planning' also considered at the same time (see also separate proposal)

NR/P175

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	DAMG on behalf of the identified companies accepts this proposal.
Network Rail	Network Rail accept the proposal
DAB DECISION	The Board when reaching its decision at the 9 th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.

Originators Reference Code / N ^o	NR/P176
Name of the original sponsoring organisation(s)	Network Rail
Exact details of the change proposed	New 4.23.6 4.23.6 Regulation of early running trains <i>(Add matrix shown below)</i>
Reason for the change	A significant amount of parties' performance team's time is spent debating regulation decisions, and often relates to early running trains across Route or signalling control boundaries and where any control or mitigation could have occurred. This proposal seeks to highlight and clarify the reasons for and subsequent rationale for attribution for the common delays and mitigatory possibilities for early running trains

No.	Circumstances	Delay Code	Incident Attribution
a.	Train running early (any reason) and regulating error occurs at point of delay (i.e. early train could have been held at that point causing no delay)	OB	Attribution to LOM code controlling section that regulation error occurred (OQ**)
b.	Train running early that could have been held at a prior regulating point where no delay would have occurred (no regulating error at point of delay)	OC	Attribution to LOM code controlling section where train could have been held Note – if the section is on another Route then DAG 2.6.17 applies (OQ**)
c.	Train running early on control agreement (not withstanding scenario 1)	OD	Attribution to go to the Control Manager that agreed running early Note – If it is another Route Control agreement then 2.6.17 applies (OQ**)
d.	Train running early due to a driver / shunter request that signaller agrees to (i.e. not processed through Control) (not withstanding scenario 1)	OC	Attribution to LOM code controlling the 'box that allowed early running (OQ**)
e.	Train running early as a direct result of a known incident – e.g. diverted via quicker route. (not withstanding scenario 1)	Prime cause incident	Attribution to the incident causing early running.

NR/P176

Company Organisation	Comments
DAMG - on behalf of the identified companies as per page 1.	<p>DAMG on behalf of the identified companies rejects in current form,</p> <ul style="list-style-type: none"> • Reason 1) how early is early, 1 min or 20 mins, as is this proposal will create disputes due to lack of specification. • Reason 2) Propose change to part a: the language is not clear . reword to “Train running early is incorrectly given priority causing delay, where no prior regulation opportunity exists, regardless of reason for early running” • Reason 3) reword part b : “Train running early is incorrectly given priority causing delay, where prior regulation opportunity exists, regardless of reason for early running.” • Reason 4) reword c : “Train running early given priority by control agreement causing delay, except where ‘e’ takes precedent” A also potentially contradicts NR/P170 – • Reason 5) In addition to NP176 b –Control would generally not request that a train runs early. Any such request would be to recover a delay or mitigate against further delay to that train or another service. Should this not be a reactionary delay and be part of NP176 e?
Network Rail	Network Rail accepts the proposal on the proviso that the phrase ‘Train running early and out of path’ replace ‘train running early’ and that the references be changed to reflect alphabetical instead of numerical.
DAB DECISION	<p>The Board when reaching its decision at the 9th June board meeting, considered the industry consultation feedback and the reasoning provided within the original proposal prior to considering the same for submission for ORR approval.</p> <p>This proposal was approved subject to non-material amendments. The Board suggested that under each proposed circumstance, the sentence should read – <i>Train running early and out of path</i>. As well as to change the referencing within the circumstances dialogue, from a number format to a letter format in line with the No. column. These suggestions were accepted as they provided greater clarity.</p>



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	<p>Operator's (via DAMG) comments where were provided through the consultation process were rejected as the Board agreed that they caused further confusion. A vote to establish whether to approve the original proposal was taken; with the result of 10 members approving the wording to stay as originally proposed subject to the afore mentioned non-material alterations and 2 against the proposal as cited within the DAMG comments.</p>
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Proposal for approval

Originators Reference Code / N ^o	NR/P176
Name of the original sponsoring organisation(s)	Network Rail
Exact details of the change proposed	New 4.23.6 4.23.6 Regulation of early running trains (Add matrix shown below)
Reason for the change	A significant amount of parties' performance team's time is spent debating regulation decisions, and often relates to early running trains across Route or signalling control boundaries and where any control or mitigation could have occurred. This proposal seeks to highlight and clarify the reasons for and subsequent rationale for attribution for the common delays and mitigatory possibilities for early running trains

No.	Circumstances	Delay Code	Incident Attribution
a.	Train running early <i>and out of path</i> (any reason) and regulating error occurs at point of delay (i.e. early train could have been held at that point causing no delay)	OB	Attribution to LOM code controlling section that regulation error occurred (OQ**)
b.	Train running early <i>and out of path</i> that could have been held at a prior regulating point where no delay would have occurred (no regulating error at point of delay)	OC	Attribution to LOM code controlling section where train could have been held Note – if the section is on another Route then DAG 2.6.17 applies (OQ**)
c.	Train running early <i>and out of path</i> on control agreement (not withstanding scenario a)	OD	Attribution to go to the Control Manager that agreed running early Note – If it is another Route Control agreement then 2.6.17 applies (OQ**)
d.	Train running early <i>and out of path</i> due to a driver / shunter request that signaller agrees to (i.e. not processed through Control) (not withstanding scenario a)	OC	Attribution to LOM code controlling the 'box that allowed early running (OQ**)
e.	Train running early <i>and out of path</i> as a direct result of a known incident – e.g. diverted via quicker route. (not withstanding scenario a)	Prime cause incident	Attribution to the incident causing early running.