



Delay Attribution Board

To: Gerry Leighton,
Head of Stations & Depots and
Network Code
Office of Rail Regulation
One Kemble Street
London
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From: Lee Amass
DAB Secretary
Delay Attribution Board
Floor 8
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cc: Stuart Freer
Executive, Stations & Depots and
Network Code
John Rhodes
Chairman,
Delay Attribution Board.

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Date: 13th December 2012

Submission of proposals for change to September 2012 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/P014 – Removal of code FF – Booked train crew used for another service.
- DAMG/P05 – New code YQ – Passenger overcrowding caused by a train being of short-formation
- DAMG/P06 – Revised GSMR -1 Flowchart

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.
- 4 A 'tracked-change' copy of the relevant parts of the DAG.

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 consultation for proposals closed on the 15th November 2012. A number of Industry Parties responded to the consultation process and these responses are included in this submission.

Not all decisions made by the Board have been unanimous i.e. there is dissent to advise as per Track Access Condition B2.7.1(c). A copy of the minutes of the meetings where the proposed amendments were agreed will be available should you require them.

DAB

Delay Attribution Board

I await your advice on whether you approve the amendments 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 on 1st April 2013

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

Best Regards,

Lee Amass



Delay Attribution Board

Industry Responses to Proposed Amendments to the Delay Attribution Guide.
Consultation closed 15th November 2012

Ref:	Proposed Changes to the September 2012 Delay Attribution Guide
DAB/P014	Removal of delay code FF
DAMG/P05	Shortformation of trains and overcrowding
DAMG/P06	Revised GSMR-1 flowchart

Responses received from

- Arriva Trains Wales
- Chiltern Railways
- DB Schenker
- East Midlands Trains
- First Great Western
- First Transpennine Express
- London Overground
- Network Rail
- Northern Rail
- Southwestern Trains
- Virgin Trains

PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAB/P014 Removal of delay code FF

Originators Reference Code / N ^o	DAB/P014
Name of the original sponsoring organisation(s)	DAB - Delay Code Review Subgroup
Exact details of the change proposed	Remove Delay Code FF from the DAG.
Reason for the change	Superfluous - seems to represent incidents of prime cause FE (driver sick, late or un-rostered).

1. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;

For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.

For Train Operator – Please provide an impact assessment on your own business.

Yes – FF represents approx 0.016% of all attributed minutes annually so these minutes will need to be re-allocated to another appropriate category.

2. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

Merge historic FF incidents with incidents coded FE (approx 0.923% of annual minutes) KPI 701C, Same KPI.

PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAB/P014 Removal of delay code FF

RAILWAY COMPANY/ORGANISATION	COMMENTS:
ARRIVA TRAINS WALES	As per the DAMG response
ATOC – DELAY ATTRIBUTION MANAGERS GROUP	Proposal is accepted
C2C Rail	No response provided
CHILTERN RAIL	As per the DAMG response
CROSS COUNTRY TRAINS	No response provided
DB SCHENKER RAIL/EWS INT/RAIL EXPRESS SYSTEMS	No comment
DRS	No response provided
EAST MIDLANDS TRAINS	As per the DAMG response
EASTCOAST LTD	No response provided
EUROSTAR	No response provided
FIRST CAPITAL CONNECT	No response provided
FIRST GREAT WESTERN	As per the DAMG response
FIRST SCOTRAIL	No response provided
FIRST/KEOLIS TRANSPENNINE LTD	As per the DAMG response
FREIGHTLINER/FREIGHTLINER HEAVY HAUL	No response provided
GB RAILFREIGHT	No response provided
GRAND CENTRAL RAILWAY	No response provided
HEATHROW EXPRESS	No response provided
HULL TRAINS	No response provided
LONDON & BIRMINGHAM RAILWAY	No response provided
LONDON & SOUTHEASTERN RAILWAY	No response provided
LONDON OVERGROUND RAIL	As per the DAMG response
MERSEY RAIL	No response provided
GREATER ANGLIA	No response provided
NETWORK RAIL INFRASTRUCTURE	Supports the proposal
NORTHERN RAIL	As per the DAMG response



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PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAB/P014 Removal of delay code FF

SOUTHERN RAILWAY	No response provided
STAGECOACH SOUTH WESTERN TRAINS	As per the DAMG response
WEST COAST TRAINS LTD (VIRGIN)	As per the DAMG response
DAB DECISION (27/11/12)	The Board considered the proposal and the industry responses received during the consultation period. The Board noted the response provided by the ATOC Delay Attribution Manager's Group (DAMG) accepting the proposal and that a number of Train Operators indicated that they supported the DAMG response
DAB APPROVED CHANGE	As per appendix 1 and the track changed DAG in appendix D

Appendix 1

Exact details of the change proposed	Remove Delay Code FF from the DAG.
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PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAMG/P05 Shortformation of trains and overcrowding

Originators Reference Code / N°	DAMG/P05
Name of the original sponsoring organisation(s)	Northern Rail Ltd on behalf of Delay Attribution Managers Group
Exact details of the change proposed	<p>Change: Append the following text to DAG Section 3.1.5</p> <p>Where an operator's service suffers delay as a result of overcrowding or station overtime due to that train being of short-formation, and all reasonable attempts to mitigate have been made, the delay should be attributed to the prime cause incident that resulted in the train being of short formation for that service.</p> <p>Add a new identifying reactionary code YQ within Appendix A, Section Y.</p> <p>CODE CAUSE ABBREVIATION</p> <p>YA Lost path - regulated for train running on time REG-ONTIME YB Lost path - regulated for another late running train REG-LATE YC Lost path - following train running on time FOL-ONTIME YD Lost path - following another late running train FOL-LATE YE Lost path - waiting acceptance to single line TO S/LINE YF Waiting for late running train off single line OFF SLINE YG Regulated in accordance with Regulation Policy CORRCT REG YH Late arrival of inward loco INWD LOCO YI Late arrival of inward stock/unit INWD STOCK YJ Late arrival of Traincrew on inward working INWD CREW YK Waiting connecting Freight or Res traffic to attach CNNCTN TFC YL Waiting passenger connections within Connection Policy AUTHSD CON YM Special stop orders agreed by Control AUTHSD SSO YN Booked traincrew not available for late running train FIND CREW YO Waiting platform/station congestion/platform change PLATFORM YP Delayed by diverted train DIVERSION YU Prime cause of most unit swaps UNIT SWAPS YQ Passenger overcrowding caused by a train being of short-formation SHRT FRMD YX Passenger overcrowding caused by delay/cancellation of another train OVER CRWD</p>
Reason for the change	Benefits the performance improvement process by capturing the impact

PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAMG/P05 Shortformation of trains and overcrowding

	of capacity shortages on punctuality leading to improved root cause information for understanding capacity availability and utilisation. This is consistent with the proposed enabling measures given in the ORR consultation paper 'Network Rail's output framework for 2014-19' (page 7) published in August 2012. This change complements the introduction of 'YX' in the September 2012 guide.
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1. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;

For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.

For Train Operator – Please provide an impact assessment on your own business.

No.

It appears most TOCs/NR Routes already attribute in this way and this is a simple clarification of the DAG.

2. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

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PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAMG/P05 Shortformation of trains and overcrowding

RAILWAY COMPANY/ORGANISATION	COMMENTS:
ARRIVA TRAINS WALES	As per the response given by DAMG
ATOC – DELAY ATTRIBUTION MANAGERS GROUP	Proposal is accepted Updates the DAG reactionary codes to assist in the identification of short forms in capacity in reaction to an unplanned disruptive event.
C2C Rail	No response provided
CHILTERN RAIL	As per the response given by DAMG
CROSS COUNTRY TRAINS	No response provided
DB SCHENKER RAIL/EWS INT/RAIL EXPRESS SYSTEMS	Accepts the proposal subject to : The proposed new delay code YQ should be inserted in alphabetical order in Section Y of Appendix A to the Delay Attribution Guide (i.e. after YP and not after YU as indicated). For clarity, DB Schenker also considers that the proposed text should be inserted into the Delay Attribution Guide as 3.1.6 rather than appended to existing 3.1.5 which deals with Code YX issues.
DRS	No response provided
EAST MIDLANDS TRAINS	As per the response given by DAMG
EASTCOAST LTD	No response provided
EUROSTAR	No response provided
FIRST CAPITAL CONNECT	No response provided
FIRST GREAT WESTERN	As per the response given by DAMG
FIRST SCOTRAIL	No response provided
FIRST/KEOLIS TRANSPENNINE LTD	As per the response given by DAMG
FREIGHTLINER/FREIGHTLINER HEAVY HAUL	No response provided
GB RAILFREIGHT	No response provided
GRAND CENTRAL RAILWAY	No response provided
HEATHROW EXPRESS	No response provided
HULL TRAINS	No response provided
LONDON & BIRMINGHAM RAILWAY	No response provided

PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAMG/P05 Shortformation of trains and overcrowding

LONDON & SOUTHEASTERN RAILWAY	No response provided
LONDON OVERGROUND RAIL	As per the response given by the DAMG
MERSEY RAIL	No response provided
GREATER ANGLIA	No response provided
NETWORK RAIL INFRASTRUCTURE	NR does not support this change proposal in its current form. We are not convinced that the level and quality of information will be available at level 1 to allow for confident attribution in 'real time'. It is more likely that down stream analysis would be more successful in correctly identifying such underlying contributory factors. As such we are of the opinion that this proposal in its current form would in practice prove to be both unreliable and unworkable. We also note that at face value it seems to run counter the current DAB work stream aimed at simplifying the delay code matrix and attribution guidance provided by the Board within its guide.
NORTHERN RAIL	As per the response given by the DAMG
SOUTHERN RAILWAY	No response provided
STAGECOACH SOUTH WESTERN TRAINS	As per the response given by the DAMG
WEST COAST TRAINS LTD (VIRGIN)	As per the response given by the DAMG
DAB DECISION (27/11/12)	<p>The Board considered the proposal and the industry responses received during the consultation period. The Board noted the response provided by the ATOC Delay Attribution Manager's Group (DAMG) accepting the proposal and that a number of Train Operators indicated that they supported the DAMG response. The Board noted that Network Rail rejected the proposal on the basis that it had reservations on whether the level and quality of the information would be available at level 1 to allow for attribution in real-time.</p> <p>The Board discussed matters regarding the impact of a Disruptive Event (as defined in the Network Code) and the subsequent overcrowding that may result from short-formed trains being run in schedules as part of the operational recovery from the incident. Concern was</p>

PROPOSALS FOR CHANGE TO THE SEPTEMBER 2012 DELAY ATTRIBUTION GUIDE INDUSTRY FEEDBACK

DAMG/P05 Shortformation of trains and overcrowding

	<p>raised as to how staff attributing on the day of an incident would have the information available to them to be able to distinguish between delays caused by passenger loading and delays caused by overcrowding due to short-formed trains. Train Operator representatives explained how this information was known by operator control and at worst this information would be available for resolution the day following an incident.</p> <p>The Board supported the suggestions provided by DB Schenker whereby the delay code YQ should be inserted in alphabetical order in Section Y of Appendix A and that the proposed text should be inserted as a separate section numbered 3.1.6 as it provides clarification of the use of YQ and not append to 3.1.5 which deals with Code YX issues.</p> <p>The proposal was approved by a majority vote with 9 votes in favour (6 operators and 3 Network Rail), 1 vote against (Network Rail) and 1 abstention (Network Rail).</p>
DAB APPROVED CHANGE	As per appendix B and the track changed DAG in appendix D

Appendix B

Change: Create DAG Section 3.1.6 – add the following text

Where an operator's service suffers delay as a result of overcrowding or station overtime due to that train being of short-formation, and all reasonable attempts to mitigate have been made, the delay should be attributed to the prime cause incident that resulted in the train being of short formation for that service.

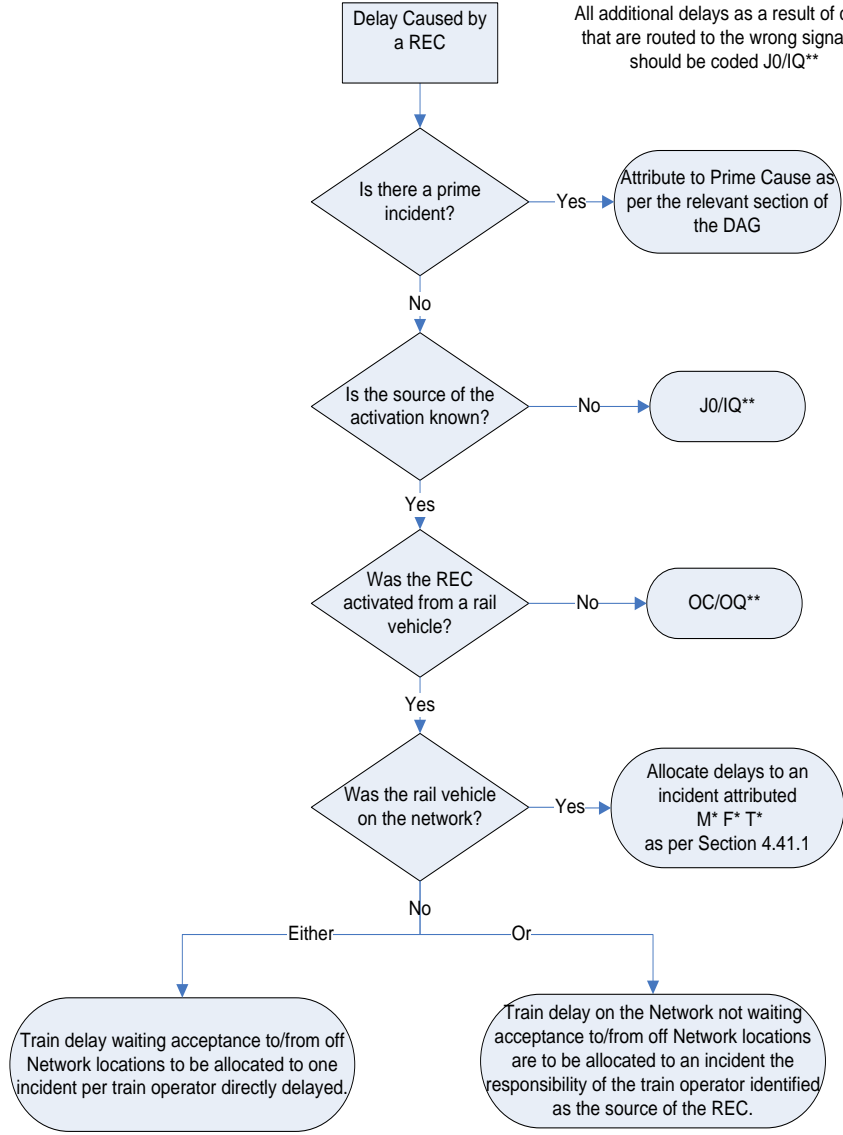
Add a new identifying reactionary code YQ within Appendix A, Section Y.

CODE CAUSE ABBREVIATION

YP Delayed by diverted train DIVERSION

YQ Passenger overcrowding caused by a train being of short-formation SHRT FRMD

Originators Reference Code / N°	DAMG/P06 – GSMR Flowchart
Name of the original sponsoring organisation(s)	Northern Rail Ltd on behalf of ATOC DAMG
Exact details of the change proposed	<p>INSERT A NEW flow chart in SECTION : 4.41 after</p> <p>4.41 Operational GSM-R (Railway Emergency Call Under normal circumstances all delays will be coded to the Prime cause for the reason for the REC. However, if the prime cause and/or the initiating train cannot be identified the delay will initially be coded JO (ZERO) (1). In these circumstances the delays maybe recoded when further information becomes available.</p>

	<p style="text-align: center;">GSM- R REC 4.41.1</p> <div style="text-align: right; margin-bottom: 10px;"> <p>All additional delays as a result of calls that are routed to the wrong signaller should be coded J0/IQ**</p> </div>  <pre> graph TD Start[Delay Caused by a REC] --> D1{Is there a prime incident?} D1 -- Yes --> A1[Attribute to Prime Cause as per the relevant section of the DAG] D1 -- No --> D2{Is the source of the activation known?} D2 -- No --> A2(J0/IQ**) D2 -- Yes --> D3{Was the REC activated from a rail vehicle?} D3 -- No --> A3(OC/OQ**) D3 -- Yes --> D4{Was the rail vehicle on the network?} D4 -- Yes --> A4[Allocate delays to an incident attributed M* F* T* as per Section 4.41.1] D4 -- No --> Split((Either / Or)) Split --> A5[Train delay waiting acceptance to/from off Network locations to be allocated to one incident per train operator directly delayed.] Split --> A6[Train delay on the Network not waiting acceptance to/from off Network locations are to be allocated to an incident the responsibility of the train operator identified as the source of the REC.] </pre>
Reason for the change	Addition of flow chart, to support understanding after initial proposal was considered to be unclear.

1. Do you perceive that this proposal will have a wider impact (including commercial impact) on your business or the business of any other industry parties?

If yes;

For Network Rail – Please provide an impact assessment indicating the impact of the proposal on all affected industry parties.

For Train Operator – Please provide an impact assessment on your own business.

NO, this is intended to assist clarity on the section already inserted in the DAG

2. If you have provided an impact assessment as per question 1 above, please provide a proposed solution to neutralise any financial effect of the proposal.

N/A

RAILWAY COMPANY/ORGANISATION	COMMENTS:
ARRIVA TRAINS WALES	As per the response given by DAMG
ATOC – DELAY ATTRIBUTION MANAGERS GROUP	Proposal is accepted
C2C Rail	No response provided
CHILTERN RAIL	As per the response given by DAMG
CROSS COUNTRY TRAINS	No response provided
DB SCHENKER RAIL/EWS INT/RAIL EXPRESS SYSTEMS	The proposal is accepted subject to the following: It is not clear that the proposal as to the intention of the current wording in DAG 4.41 “Note 1: All additional delays as a consequence of calls that are wrongly routed, i.e. patched to the incorrect signaller should be coded J0(zero)”. It is not stated whether this wording is to be deleted or retained although it appears that it is now covered by alternative wording at top right in the proposed flowchart.
DRS	No response provided
EAST MIDLANDS TRAINS	As per the response given by DAMG
EASTCOAST LTD	No response provided
EUROSTAR	No response provided
FIRST CAPITAL CONNECT	No response provided
FIRST GREAT WESTERN	As per the response given by DAMG
FIRST SCOTRAIL	No response provided
FIRST/KEOLIS TRANSPENNINE LTD	As per the response given by DAMG
FREIGHTLINER/FREIGHTLINER HEAVY HAUL	No response provided
GB RAILFREIGHT	No response provided
GRAND CENTRAL RAILWAY	No response provided
HEATHROW EXPRESS	No response provided
HULL TRAINS	No response provided
LONDON & BIRMINGHAM RAILWAY	No response provided
LONDON & SOUTHEASTERN RAILWAY	No response provided
LONDON OVERGROUND RAIL	As per the response given by the DAMG
MERSEY RAIL	No response provided
GREATER ANGLIA	No response provided
NETWORK RAIL INFRASTRUCTURE	Supports the addition of the amended flowchart.
NORTHERN RAIL	As per the response given by the DAMG
SOUTHERN RAILWAY	No response provided
STAGECOACH SOUTH WESTERN TRAINS	As per the response given by the DAMG
WEST COAST TRAINS LTD (VIRGIN)	As per the response given by the DAMG

DAB DECISION (27/11/12)	<p>The Board considered the proposal and the industry responses received during the consultation period. The Board noted the response provided by the ATOC Delay Attribution Manager’s Group (DAMG) accepting the proposal and that a number of Train Operators indicated that they supported the DAMG response. The Board agreed with the suggestion from DB Schenker for the removing of Note 1 from Section 4.41.</p> <p>The Proposal, along with the suggestion from DB Schenker, was approved by unanimous vote.</p>
DAB APPROVED CHANGE	As per Appendix C and the tracked change DAG in appendix D

Appendix C

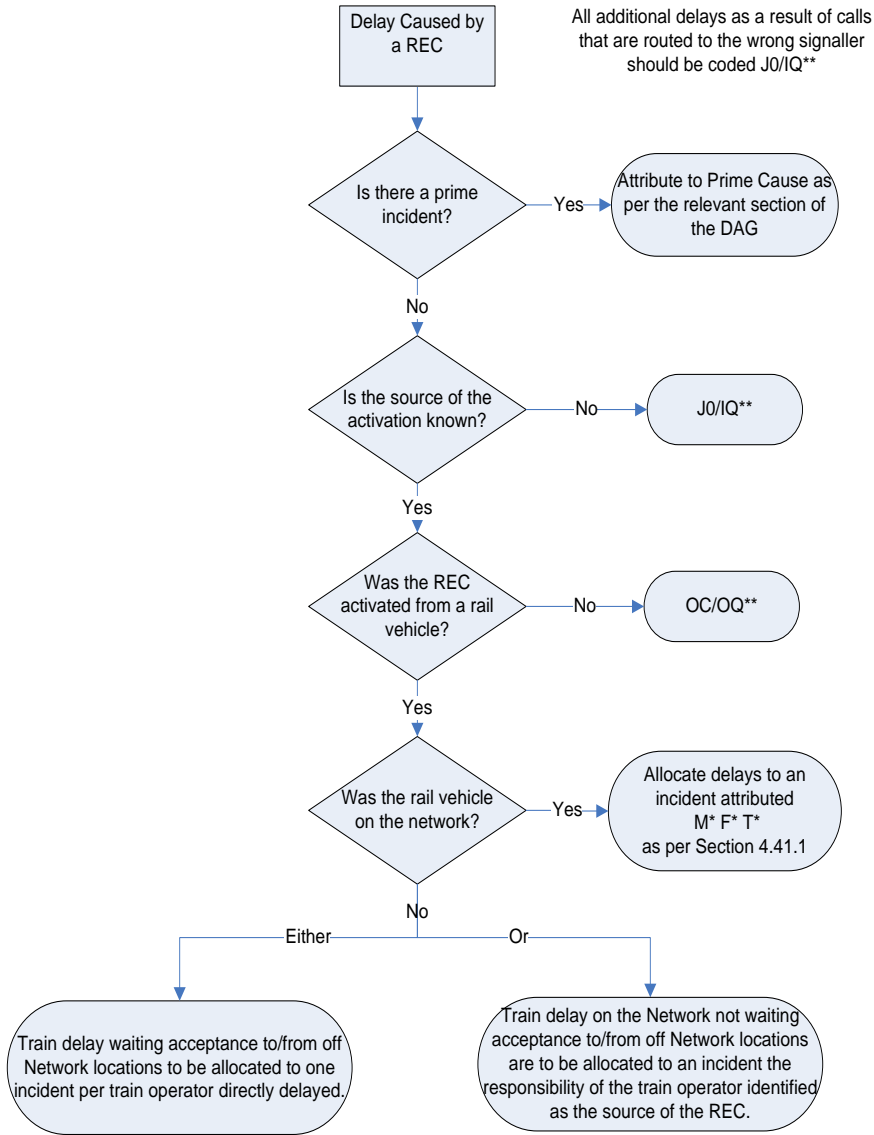
INSERT A NEW flow chart in SECTION : 4.41 after

4.41 Operational GSM-R (Railway Emergency Call

Under normal circumstances all delays will be coded to the Prime cause for the reason for the REC. However, if the prime cause and/or the initiating train cannot be identified the delay will initially be coded J0 (ZERO) (1). In these circumstances the delays maybe recoded when further information becomes available.

Remove note 1 from Section 4.41

GSM- R REC 4.41.1



Appendix D

DAB/P014 – Removal of delay code FF – Booked train crew used for another service

SECTION F - FREIGHT OPERATING COMPANY CAUSES

Abbreviated Departmental Cause Code: FOC

These codes are for delays caused by Freight Operating Companies/Res except for T&RS problems (M-codes) and those due to Terminal Operations (A-codes). Incidents are attributable to the company running the train.

CODE	CAUSE	ABBREVIATION
FA	Dangerous goods incident	DGI INCDT
FB	Train stopped on route due to incorrect marshalling	REMARSHALL
FC	Freight train driver	FCDRIVER
FD	Booked loco used on additional/other service	LOCO USED
FE	Traincrew rostering error/not available, including crew relief errors	NO T/CREW
FG	Driver adhering to company professional driving standards or policy	PRO DVR
FH	Train crew/loco diagram/planning error (See also DAG Section 4.31.2)	DIAG ERROR
FI	Delay in running due to the incorrect operation of the on-board ETCS/ ERTMS equipment – i.e. wrong input by driver.	ETCS INPUT
FJ	Train held at Customer's request	RETIME REQ
FK	Train diverted/re-routed at Customer's request	DIVERT REQ
FL	Train cancelled at Customer's request	CANCEL REQ
FM	Tail lamp/head lamp out or incorrectly shown	TAIL LAMP
FN	Late presentation from Europe	LATE CHUNL
FO	Delay in running believed to be due to Operator, but no information available from that Operator	FOC UNEX
FP	Incorrect route taken or route wrongly challenged by driver, including SPAD's	FTO MISRTE
FS	Delay due to ETCS/ ERTMS on-board overriding driver command	ETCS OVRD

FT	Freight Operator autumn-attribution Neutral Zone delays	LF NEUTRAL
FU	Formal Inquiry Incident - possible Operator responsibility	JOINT INQ
FW	Late start/yard overtime not explained by Operator	LATE START
FX	Freight train running at lower than planned classification	LOW CLASS
FY	Mishap caused by Freight Operating Company or on FOC-owned infrastructure	FOC MISHAP
FZ	Other Freight Operating Company causes, including Freight Operating Company Control directive, cause to be specified	FOC OTHER

DAMG/P05 – New Code YQ – Passenger overcrowding caused by a train being of short-formation

3.1.5 If an operator’s service is delayed due to overcrowding as a result of an operator’s train either being cancelled, or delayed, any delay or cancellation is to be attributed to *the* prime cause of why the initial train was delayed, or cancelled.

3.1.6 *Where an operator’s service suffers delay as a result of overcrowding or station overtime due to that train being of short-formation, and all reasonable attempts to mitigate have been made, the delay should be attributed to the prime cause incident that resulted in the train being of short formation for that service.*

SECTION Y - REACTIONARY DELAYS

Abbreviated Departmental Cause Code: REAC

These codes relate to knock-on effects of late running trains. TRUST will ask the inputter to identify the incident causing the original delay to the (other) train involved

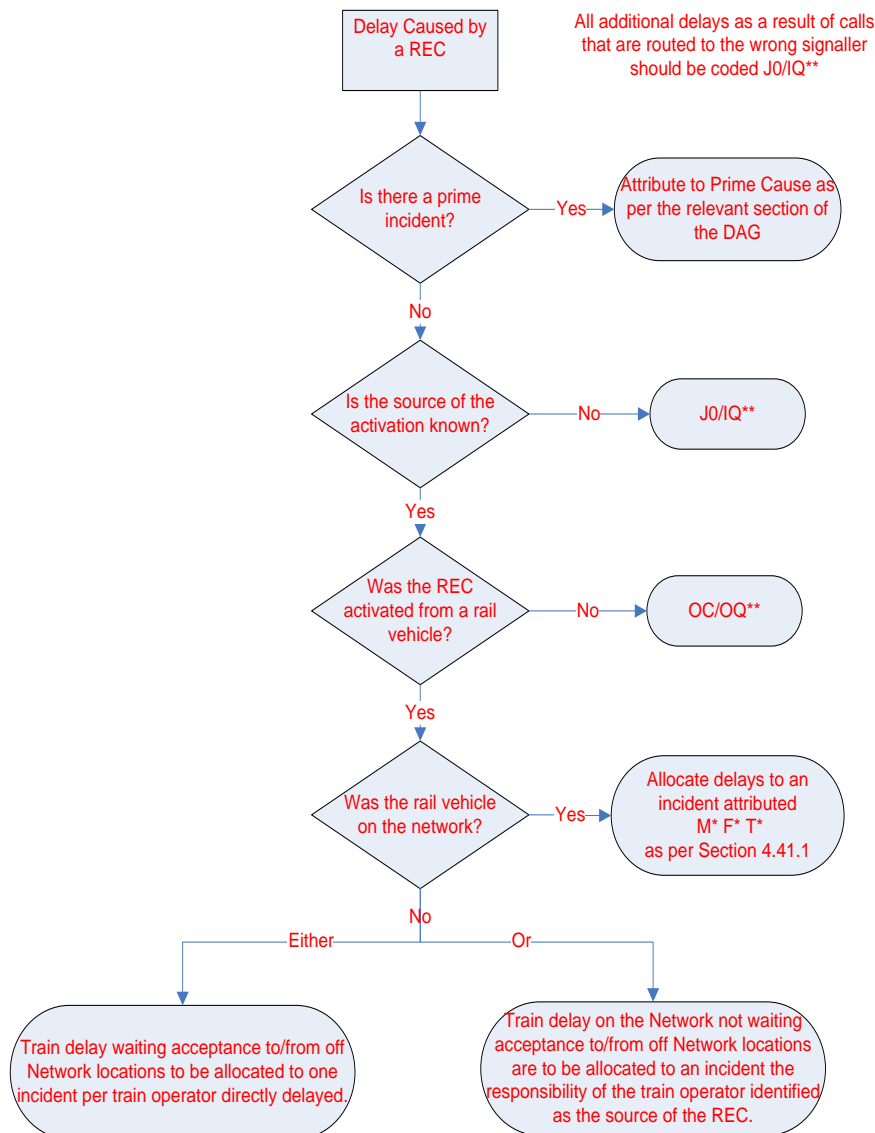
CODE	CAUSE	ABBREVIATION
YA	Lost path - regulated for train running on time	REG-ONTIME
YB	Lost path - regulated for another late running train	REG-LATE
YC	Lost path - following train running on time	FOL-ONTIME
YD	Lost path - following another late running train	FOL-LATE
YE	Lost path - waiting acceptance to single line	TO S/LINE
YF	Waiting for late running train off single line	OFF SLINE
YG	Regulated in accordance with Regulation Policy	CORRECT REG
YH	Late arrival of inward loco	INWD LOCO
YI	Late arrival of inward stock/unit	INWD STOCK
YJ	Late arrival of Traincrew on inward working	INWD CREW
YK	Waiting connecting Freight or Res traffic to attach	CNNCTN TFC
YL	Waiting passenger connections within Connection Policy	AUTHSD CON
YM	Special stop orders agreed by Control	AUTHSD SSO
YN	Booked traincrew not available for late running train	FIND CREW
YO	Waiting platform/station congestion/platform change	PLATFORM
YP	Delayed by diverted train	DIVERSION
YQ	Passenger overcrowding caused by a train being of short-formation	SHRT FRMD
YU	Prime cause of most unit swaps	UNIT SWAPS
YX	<i>Passenger overcrowding caused by delay/cancellation of another train</i>	<i>OVER CRWD</i>

DAMG/P06 – Revised GSMR-1 Flowchart

4.41 Operational GSM-R (Railway Emergency Call)

Under normal circumstances all delays will be coded to the Prime cause for the reason for the REC. However, if the prime cause and/or the initiating train cannot be identified the delay will initially be coded J0 (ZERO) (1). In these circumstances the delays maybe recoded when further information becomes available.

GSM-R REC 4.41.1



4.41.1. Likely Circumstances