

DB Schenker Rail (UK) Ltd
2nd Floor McBeath House
310 Goswell Road
London EC1V 7LW

Gabriela Weigertova
Regulatory Economist
Network Rail Infrastructure Limited
4th Floor Kings Place
90 York Way
London N1 9AG

Nigel Oatway
Access Manager

Telephone: +44 (0)1302 577010
Fax: +44 (0)20 7833 8449
Mobile: +44 (0)7801 905240
nigel.oatway@dbshenker.com

30 March 2012

Dear Gabriela,

ALLOCATING FREIGHT VEHICLES TO SUSPENSION BANDS – CONSULTATION ON A REVISED APPROACH

This letter constitutes the response by DB Schenker Rail (UK) Limited ('DB Schenker') to the consultation letter entitled '*Allocating Freight Vehicles to Suspension Bands – Consultation on a Revised Approach*' issued by Network Rail on 2 March 2012.

- *Introduction*

DB Schenker welcomes confirmation that Network Rail still intends to introduce a new quantitative vertical banding method (incorporating the Ride Force Count ('RFC') methodology) for ranking vehicles in terms of magnitude of dynamic ride forces. DB Schenker also welcomes confirmation that the new methodology will apply to new vehicles from the start of CP5 (1 April 2014) and will not be retrospectively applied to existing vehicles (at least until CP6), a particular concern DB Schenker raised in its response to the previous consultation.

- *Appendix A – Specific Consultation Questions*

Q1 – Do you agree that the revised approach (to allocating freight vehicles to Suspension Bands) addresses the issues raised in responses to the June 2011 consultation?

The revised approach appears to address most of the concerns raised by DB Schenker in the previous consultation although it would still wish to see the proposed process in further detail to enable it to understand and evaluate what resources will be required to apply the new methodology.

Q2 – Do you consider the revised approach to be generally fit for purpose?

Yes.

Q3 – *Do you have any comments to make on Manchester Metropolitan University's (MMU) report?*

Not at this stage but DB Schenker notes that further work (detailed in the report) is required before the revised approach could be fully implemented. DB Schenker would wish to be kept advised of this further work as it progresses.

Q4 – *Do you agree with our proposal to introduce the revised approach (to allocating freight vehicles to Suspension Bands) from the beginning of CP5?*

Yes.

Q5 – *Do you agree that the revised approach (to allocating freight vehicles to Suspension Bands) should not be applied retrospectively for old bogie types in CP4 and CP5?*

Yes

Q6 - *Do you agree that it is reasonable to reset all Suspension Factors to 1.00 from the beginning of CP6?*

DB Schenker has a number of concerns regarding this proposal. If all Suspension Factors are reset to 1.00, then it would appear that those vehicles that are believed to cause the most wear and tear on the network (Suspension Bands 1 to 3) will benefit, whereas those causing less wear and tare (Suspension Band 4 and above) will be disadvantaged. DB Schenker would be opposed to any unilateral and general changes to Suspension Bands which are not based on engineering logic and fact. Instead, DB Schenker considers that interested parties should work together to identify those existing vehicles that can be easily assessed using the new methodology (i.e. the input information required is readily available) and that these vehicles should be taken through the process before CP6. Any existing (mainly older) vehicles remaining which do not have the necessary information available (e.g. original design drawings, validated bogie or vehicle model) should remain in their existing bands.

Q7 – *Do you agree that it is reasonable to retain the current spread between the highest and lowest Suspension Factors of +9.8% and -14.2% respectively?*

Yes

Yours sincerely,


Nigel Oatway
Access Manager

...