Gerry Leighton,
Head of Stations & Depots and
Network Code
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

25th November 2014

Submission of proposal for change to October 2014, Delay Attribution Guide (DAG) for endorsement.

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/P231 - Reactionary Codes - Consolidation of Y Codes

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.
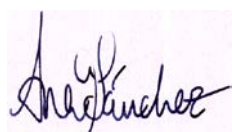**3**   The DAB decision and consideration of the responses from the industry.

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. A number of Industry Parties responded to the consultation process and these responses are included in this submission.

The decision made by the Board has been unanimous.   A copy of the minutes of the meetings where the proposed amendment was agreed is available should you require it.

I await your advice on whether the amendment has been endorsed. 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 **1st April 2015.**

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

Kind regards,

Ana Maria Sanchez, BA(Hons)
PA to DA Board Secretary

Enc –
DAB/P231- Reactionary codes - consolidation of Y codes proposal.
Industry consultation feedback
Section 7Y of the October DAG.

**PROPOSALS FOR CHANGE TO THE
DELAY ATTRIBUTION GUIDE**
October 2014 Edition **INDUSTRY FEEDBACK**

Industry Responses to Proposed Amendments to the Delay Attribution Guide.

Proposal reference no:
DAB/231 - Reactionary Codes - Consolidation of Y codes

Consultation closed - 28th October 2014

Responses received from
East Midlands Trains Ltd
Grand Central
Network Rail
Northern Rail
Virgin Trains
First Scotrail

Company Organisation	Comments
Abellio Greater Anglia	No response received
Arriva Trains Wales	No response received
c2c Rail Ltd	No response received
Chiltern Railways	No response received
Colas Rail	No response received
DB Regio Tyne & Wear	No response received
DBSchenker	Supports the proposed changes
Devon & Cornwall Railways	No response received
Direct Rail Services	No response received
East Coast	No response received
East Midland Trains	As per the response provided by the DAMG
Eurostar International	No response received
First / Keolis Transpennine	No response received
First Capital Connect	No response received
First Greater Western	No response received
First Hull Trains	No response received
First Scotrail	No response received
Freightliner	No response received
GB Railfreight	No response received
Grand Central Railway	As per the response provided by the DAMG
Harsco Rail	No response received
Heathrow Express	No response received
London Midland	No response received
London Overground	No response received
Merseyrail	No response received
North Yorkshire Moors	No response received
Northern Rail	As per the response provided by the DAMG
Southeastern	No response received
Southern	No response received
Stagecoach South West	No response received
Virgin Trains	As per the response provided by the DAMG
West Coast Railway	No response received
XC Trains	No response received
DAMG - on behalf of the above companies	Accepts the proposal as it believes that it adds better clarity to the explanation of reactionary delays
Network Rail	The "Delay Attribution Guide - Proposals for change - Industry Consultation - DAB/P231 Reactionary delay codes consolidation of Y codes" documentation received contains a reference to a new code "YT": This is to be used to attribute "Reactionary delay to a train that is not leaving the network delayed by a train that is leaving the network" however in the related DAB document "Understanding Reactionary Delay Attribution Guidance Note" subsequently issued to industry uses the code "YS" in these circumstances. Can DAB please provide clarification as to the correct code to be used YT or YS?

	In addition a number of "Code descriptions" associated with the following codes (YB, YI, YL,) do not correspond with the expected outcome of the subgroup. It would seem there have been some editorial changes following the subgroup outputs; unfortunately the reasoning for these changes was not provided within the Industry consultation documentation and was not communicated to subgroup members. YB expected outcome read "Lost path – regulated for a later running train " YI expected outcome read "Late arrival of booked inward stock " YL expected outcome read "Waiting passenger connections within connections policy, Contingency Plan or otherwise agreed by NR/TOC"
DAB DECISION	At the 25th November 2014, Board meeting. The Board when reaching its decision to submit the proposal to the ORR for approval, considered the industry consultation feedback and the reasoning provided within the original proposal. The Board discussed the points raised by Network Rail and agreed to make non material changes to resolve the matters that were raised. The code description of the proposed YB would be changed from "Delay due to another later running train" to **Lost path- regulated for another later running train"** The code description of the proposed YI would be changed from "Late inward stock" to "**Late arrival of booked inward stock"** The non material changes were proposed to allow for consistent wording among the Y codes as well as an improved level of clarity as to when to use the codes.

This proposal for change is to be applied to Section 7Y of the October 2014 Delay Attribution guide.

	Information Required
Originators Reference Code / Nº	DAB/P231
Name of the original sponsoring organisation(s)	DAB
Exact details of the change proposed	As per the attached documentation
Reason for the change	Throughout 2013 the DAB has undertaken a review of the suitability of Delay Codes in the DAG. During this review some questions were raised by industry parties about the suitability of the Reactionary Delay, 'Y' codes. Reactionary Delay is a key topic in train performance as the railway is congested and any incident - be it track, train or trespass -has an effect, which can be represented through reactionary coding.
	A detailed review of requirements for Reactionary Delay information has been undertaken by train operator and Network Rail performance teams. This proposal is the output of a cross-industry DAB subgroup building on the successes of simplification of the Delay Codes within the DAG. The simplification and clarification represented by the Reactionary Delay Codes proposed here is intended to reduce the complexity of the process for attribution staff and the removes the need to ascertain detailed information that may not be easy to identify / obtain in realtime, without lengthy investigation and specialist knowledge, balanced against a requirement for specific intelligence about reactionary delays.
	The DAG refers to "following/regulated for… an on-time train" without giving a definition of what constitutes on

These proposals for change are to be applied to Section 7Y of the October 2014 Delay Attribution guide.

	time; several interpretations are used and this issue remains unresolved with the current Y codes. None of these proposals refer to 'on-time' trains and therefore this ambiguity is removed.
	The inclusion of cancellations into reactionary coding is considered useful in identifying the trade-off with delays but more significantly to better understand those cancellations caused directly by an incident and those to recover lost running. This is especially significant as in a pressured environment, often generated around major incidents; the data needs to be more accurate to be meaningful. In this way a better understanding of the 'whole' picture of service disruption would be seen, particularly over the split of capacity and late start events.
Other Implications / Impact of the Proposed Change	Expected benefits are for the performance improvement process to allow for the representation of reactionary delays at a more specified level. Ie. Regulation decisions and the impact of network congestion and disruption. The resulting data should enable the industry to form a far more sophisticated view of service management and something more holistic in terms of the influence signallers have on performance.

These proposals for change are to be applied to Section 7Y of the October 2014 Delay Attribution guide.

Reactionary Delay Code	Code description	Abbreviation	Proposal for change	Reason for change
YA	Lost path - regulated for train running *less late*	REG-ONTIME	Propose to add the words **less late** to the current code description	To remove the dubiety of 'on time'
YB	*Lost path - regulated for another later running train*	REG-LATE	Replace current wording in YB with 'Lost path - regulated for another later running train.	To provide improved clarity on when to use this code compared to code YC or YD.
YC	Lost path - following train running *less late*	FOL-ONTIME	Replace current wording in YC with 'Lost path - following train running less late'.	Propose to add the words **less late** to code YC so that better clarity is given as to when to use the code.
YD	Lost path - following another *later* running train	FOL-LATE	Replace current wording in YD with 'Lost path - following another later running train'.	To provide clearer understanding of when to use the code.
YE	*Waiting to/from single line*	TO S/LINE	Replace current wording in YE to 'Waiting to/from single line'. Remove code YF as this code description is incorporated in to YE code.	Merging of codes YE & YF and a change of the code description to read **waiting to/from single line** intends to allow for a clear streamline of the current code structure
YG	Regulated in accordance with regulation policy	*REG INSTRUC*	Replace the current abbreviation to REG INSTRC	It was considered that there are times when the regulation policy has not always been 'correct.'
YH	Late arrival of inward stock		Remove code YH	This code is to be replaced by YI as it was considered that YH and YI were suitably similar to permit their merger.
YI	*Late arrival of booked inward stock*	INWD STOCK	Replace current wording with 'Late arrival of booked inward stock'	To incorporate code YH with YI as part of the project to reduce the number of similar codes the DAG has.
YJ	*Late arrival of booked train-crew*	INWD CREW	Replace current wording with'- *Late arrival of booked train crew'.*	To provide clearer wording for the use of YJ
YK			Remove code	This code is covered by YI

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Reactionary Delay Code	Code description	Abbreviation	Proposal for change	Reason for change
YL	Waiting passenger connections within connections policy, contingency plan *or otherwise agreed by NR/TOC*	AUTHSD CON	Replace the current wording with 'waiting passenger connections within connections policy, contingency plan or otherwise agreed by NR/TOC'.	Clear wording required to explain when to use this code.
YM	Special stop orders *within the contingency plan or agreed by NR/TOC*	AUTHSD SSO	Replace the current wording to 'Special stop orders within the contingency plan or agreed by NR/TOC'.	Clear wording required to explain when to use this code.
YN	*Service Recovery- booked train crew, not available.*	FIND CREW	Replace the current code description to Service Recovery- booked train crew, not available'.	Incorporate clearer wording for the code description, so that it incorporates the measurement of delays caused by service recovery
YP	*Delays due to diversions from booked route or line*	DIVERSION	Replace current code description with 'Delays due to diversions from booked route or line'.	To allow for increased clarification and to incorporate delays which are caused by diversions which are not at a station.
YR (NEW)	*Tactical cancellation for service recovery not caused by late running.*	SR CNCL	Insert new code YR, code description and abbreviation to section 7Y of the DAG	There are no codes that cover these forms of control decision. The change seeks to improve the understanding of service recovery decision by identifying cancelations that are due to tactical service recovery decisions to 'thin' the service.
YU	*Service Recovery - booked rolling stock, not available.*	UNIT SWAPS	Replace current wording to Service Recovery - booked rolling stock, not available.	Clarification of the code description to incorporate delays which are caused by actions taken to recover the train service.

These proposals for change are to be applied to Section 7Y of the October 2014 Delay Attribution guide.

Reactionary Delay Code	Code description	Abbreviation	Proposal for change	Reason for change
YT (NEW)	Reactionary delay to a train that is not leaving the network, by a train that is leaving the network.	NON NR INF	Insert NEW CODE YT- add to the code description - 'Reactionary delay to a train that is not leaving the network, by a train that is leaving the network'.	Currently, there is no code that is assumed to cover this form of delay. This is applicable to trains delayed by trains waiting to leave the Network - Waiting acceptance