

Feedback		Answer
1 -publication is not aligned (e.g. communication by DB InfraGO on 9th October 2025) -slightly different deadlines for end of consultation (5th November 2025 for Trafikverket)	While we do not see any willingness from the involved IMs at this moment to initiate the process of harmonising timelines, we consider cooperation among IMs on this matter appropriate.	
2 -General and important: the common denominators in chapter 2.1 are appreciated, showing the differences in the countries. Is there also a process planned to minimize the gaps and to harmonise the processes? For the customer it is not clear how to overcome the differences. -Disclaimer in Common Strategy: in case of published national Capacity Strategy and participating in common strategy – national capacity strategy wins -> Meaning common strategy has no value? Separate information flows? Not useful for RUs? hopefully changing with new capacity regulation	Since the EU-Reg only stipulates final deadlines for the publication of the draft and final CS, any other harmonised timeline would need to be determined in the EFCM negotiations. The feedback from the market to have a common start and end of the consultation will be taken forward to the respective EFCM drafting meetings.	
3 Is there added value for HLK included? i.e. HLK Nürnberg-Passau from December 2026 on there should be added value. Or for HLK 2027 Rosenheim Freilassing from 5th February till 9th July 2027. -Because of different possible routes additional information would be helpful (e.g. ID of the path – Streckennummer)	It will be taken into consideration to provide IM-specific line numbering for future TCR lists to facilitate the further processing of the information contained in the CS document. It cannot be offered consistently throughout all IMs part of the Common CS Pilot of each TT year.	
4 Map does not provide any information which capacity will be reduced and how. Please present information about reduced capacity in the same way like in Chapter 1.2 Additional Available Capacity	In column 'Estimated effects on capacity' of the table with reduced capacities, we added additional information for impact on capacities.	
5 Principles for TCR Planning. Link not accessible: CS29 Chp II TCR Planning Principles - TO BE FILLED.xls	Links to SharePoint documents may need to be opened in in-cognito browser mode to ensure the functionality, which has been double-checked for both Draft and Final CS29.	
6 Major Impact TCR* 2029, total closure Forbach - Ludwigshafen. We will come to terms with the total closure between Ludwigshafen and Saarbrücken Hbf/Rbf, but ask you to check whether at least the direct cross-border line between Forbach (F) and Saarbrücken (LSSR N° line V23 2331 and then the transition to the lines leading to the marshalling yard, V2G 3234, 3238 and 2260) can be kept open in single-track operation so that the crossing of the border between Forbach and the line towards Saarbrücken Rbf is still possible – also to counteract any congestion on the diversionary route via Apach.	It is beyond the consultation of the CS29 to reply to specific rerouting requests for a single TCR at this stage. To receive a comprehensive reply, a request should be addressed through the domestic TCR coordination channels such as the KomBau tool of DB InfraGO available at https://www.dbinfraigo.com/web/schieneennetz/fahren_und_bauen/kombau-11857434	
7 The times are not Annex VII compliant: What is being done to harmonize the times and make them legally compliant? - How is harmonization between IMs supposed to work?	The implementation of Annex VII is ongoing and independent from this Common Capacity Strategy 2029 pilot. Details can be found here: https://www.dbinfraigo.com/web/schieneennetz/fahren_und_bauen/annex-vii-richtlinie-2012-34-eu-11857512 Furthermore it is vital to note that Annex VII only sets deadlines and no interim milestones or deadlines by when to "start".	
8 RU on both sides of the border would have to be involved, especially for lines at border area. Detour routes must also be available across borders (high available capacity, same parameters). It is important that the area under consideration for detour routes is sufficiently wide to ensure that the traffic can always run. For example, the detour route should only run at the cross-border section, but to coordinate from train handling point to train handling point.	The feedback has been taken into account. Currently, no changes to the border groups are foreseen.	
9 In principle, all closure periods must be possible, even at the expense of passenger traffic. Long-distance freight services can, for example, run through several night-time closures and thus experience an excessive increase in travel time.	Unfortunately, it is usually impossible to guarantee the train parameters at this stage.	
10 11 If everything is settled and a TCR window is canceled for a cross-border train path, how is the entire train path adjusted?	The feedback should be placed within the regular Annex VII processes domestically and within the annual overhaul process of the network statements in each IM which is where the TCR planning principles are indeed defined.	
12 For international traffic, the illustrations in chapter 2.1.6.1 offer greater added value, as the customer view (origin-destination view) is implemented. Should include all international axes/corridors (see SEAF Sub Group Consultation). For DB InfraGO - only half correct: Part 1 is consulted at X-8.75, with feedback at X-6, part 2 follows then consulted with feedback. The end section of part 3 is then at X-4.	Answer under investigation by the responsible IM	
13 International axes must be defined that are suitable for all modes of transport, and these must then always be consulted together. For DB InfraGO - only half correct: Part 1 is consulted at X-8.75, with feedback at X-6, part 2 follows then consulted with feedback. The end section of part 3 is then at X-4. Which meetings are meant by these? TCR-information dialogs (Bauinformationsdialog)? How does this work? There is no time between this and the start of the ATT-request phase for re-consultation of the alternative.	Answer under investigation by the responsible IM	
14 That is the essential point. This document shows the differences quite impressively. What is missing, however, is how further harmonization will take place and by when. At the moment, we have the impression that this is not yet agreed to disagree".	Comment is unclear, no answer provided, follow-up is welcome via the common email address	
15 The overview below should be expanded: inclusion of the column "Time of involvement of RUs in planning/solution finding". It is not sufficient if there is only information on the TCR in the two/three... countries.	The feedback will be taken into account to allow for the inclusion of this in the list in future.	
16 It's really important that a procedure is developed here. An additional chapter describing the procedure and escalation ways should be included here.	Answer under investigation by the responsible IM	
17 What is meant here? Should we go to the BNetzA?	Comment is unclear, no answer provided, follow-up is welcome via the common email address	
18 What about Germany – Austria and Germany – Italy? Border points are missing.	The table already contains border traffic flows between Austria and Italy, as it is intended to cover flows between neighbouring IMs. Accordingly, the common CS2029 includes the table for Austria-Italy traffic flows. Since border traffic flows are only defined between neighbouring IMs, there is no table for Germany-Italy traffic flows, and it is therefore unclear what is missing.	
19 Quarterly services as a basis: What does this mean for the 10-minute services on the PHS corridors?	The intermediate step mentioned in TBOV 6/4 includes 10-minute services. According to the generic design principles, we assume quarter-hourly services and double quarter-hourly services, whereby 10-minute services are extended to a 7.5-minute interval.	
20 International freight and passengers: separate standard routes: Does this apply to all trains? What about the IC Berlin, which is integrated?	Separate standard routes holds for the main international traffic flows, long-distance passenger services in particular. Btw, the aim is to have separated train paths as well. This is due to a capacity bottleneck caused by the combination of domestic and international travellers.	
21 Retain transfer hubs for passenger services in the region: Is "the region" defined further here?	All regional areas where intervals for passenger services are quarter-hourly or half-hourly	
22 S-Bahn-type systems around major cities: What does this mean in concrete terms for timetable development and capacity allocation?	This means that regional services will run in a higher frequency, like the Airportspänger, 'Dude Lijn' and 'Randstadspoor'.	
Page 84: Traffic flows: For the preparation of the capacity models, the projected traffic flows are based on real traffic volumes between 2015 and 2023. – the years here are the same as in the CS2028 – we don't know if this is only a mistake or it was actually calculated like this, but it seems like a mistake, since later in the text there are years 2025 and 2028 mentioned when it should actually be 2026 and 2029 (*the reference timetable for the 2028 capacity model is the 2025 Timetable*).	This is a typing error that will be corrected.	
23 Liebe RNE-Kolleg:innen, der Fokus auf Grenzübergangskapazitäten in der mitgeteilten Capacity Strategy 2029 ist aus Sicht von DB Fernverkehr bei X-36 Monaten als Vorstufe der anstehenden nationalen Capacity-Modell-Phasen nachvollziehbar.		
24 DB Fernverkehr versteht die zugrunde liegende Basis in Deutschland, das mKoK 2028ff, als Anhaltspunkt bzw. als Mindestkapazität. DB Fernverkehr sieht das mKoK 2028ff nicht als verbindlich an und arbeitet weiter mit DB InfraGO und ihren Partnerbahnen an Konzepten mit möglichen einzelnen Erweiterungen dieser Mengen. An folgenden Grenzübergangspunkten sieht DB Fernverkehr (als nur ein EVU des SPFV) bereits Heute Bedarf, die das Kapazitätangebot übersteigen: -Kehl: Angebot 1 Kapazität je 2h ggü. Bedarf DB FV von 2 Kapazitäten je 2h -Brenner: Angebot 1 Kapazität je 2h ggü. Bedarf DB FV (ab vsl. 2027) von 2 Kapazitäten je 2h	Answer under investigation	
25 Das Kapitel 2 zu den Kapazitätseinschränkungen ist aus Sicht von DB Fernverkehr noch nicht verwertbar, da die berücksichtigen Baumaßnahmen nicht repräsentativ sind bzw. aus Erfahrung des Öfteren nicht bestand haben oder noch signifikante Veränderungen erfahren.		
26 Mit freundlichen Grüßen		
27 While reviewing this document, larger gaps in the harmonization of workflows and planning practices of each IM become evident. Construction work clustering processes find a multitude of timeframes and so the consultation starts for the RUs. This lack of harmonization creates a risk of misalignment, as one IM may finalize and publish its TCR before its neighboring have had the opportunity to provide input, potentially compromising cross-border coordination. Moreover, International (TCR) coordination guidelines are vaguely described, while well-established work groups already exist. A recurring issue is the fragmented nature of contributions, where each Infrastructure Manager appears to have submitted content with varying levels of detail, structure, and clarity. This inconsistency is especially evident in sections where some IMs provide comprehensive workflows while others offer minimal or loosely organized input. Although a unified editorial framework exists, its application feels uneven: practices that cannot be clustered or compared are often relegated to "national specificities" sections, which compromises the document's coherence and readability. Moreover, an in-depth review of national specificities indicates that IMs use rather similar long-term capacity planning practices. A commonly cited example is the so-called reticular planning, a practice commonly used by most European IMs yet cited under each country's national specificity. Therefore, we would like to suggest that future common capacity strategy drafts should focus on a comparative synthesis of shared practices and structural differences rather than a sequential listing of national approaches that obscures common patterns.	As the CS2029 currently reflects the TCR project, not an obligation based on EU law, differences in national practices and timing are expected at this stage. Looking ahead, the upcoming EU Capacity Regulation and the EFCM specifically is anticipated to further harmonise processes and coordination practices at the European level. Your comments will be considered in preparing the next Common Capacity Strategy to enhance clarity, comparability, and cross-border coordination. It is key to add here that the EU-Regulation foresees the Capacity Strategy as one central repository of previously national documents, which applicants had to look up and perhaps translate on their own. This character will remain in the future.	
28 Lastly, we would also like to raise awareness on potential inconsistencies in the information shared. While the border point of Wannehain/Espelchin is nowhere to be found, maps disclose different levels of capacity occupation on either side of a border. Moreover, Infrabel's separate capacity strategy indicates different traffic flow values at two of their border points (Jemeppe and Aubange). These inconsistencies can detract the documents credibility and require a special point of attention.	Regarding the TCR Guidelines, they should remain broad and non-restrictive to cover basic aspects accepted by all involved IMs. For TCRs related to individual rail networks, responsibility lies with the responsible IM, which is bound by national processes such as tendering, financing, and traffic management. We see international TCR coordination as beneficial – a desirable goal that has not yet been achieved because it is not pursued with the same intensity as individual national interests.	
29 We hope that you may take our comments into consideration. While we truly value the great efforts made every year to improve the common capacity strategy, we would also want to raise awareness on the fact that a common document is only necessary if it is commonly written.	I think the reason for the lack of information concerning the HS line is a simple oversight during the gathering of the data and a lack of vigilance on my part. The inputs on the HS Franco-Belgian border, in agreement with all parties, is as follows: Wannehain – Espelchin 5km distance	
30 The document is very long and elaborate. That might be a good thing, but on the other hand it's really difficult to navigate. Please consider a way to make it easier to navigate the document. I'm mainly interested in the Dutch infrastructure, but it's scattered all over the document. PDF has options to minimize headings, that may already help.	Differences in traffic flow values at certain border points may occur where data are sourced from national capacity strategies of non-participating Infrastructure Managers or where different reference assumptions and update cycles apply. In the case of Belgium, Infrabel is not a participating IM in the CS2029; therefore, Belgian border sections are not fully covered or harmonised within the Common Capacity Strategy. The missing representation of the Wannehain/Espelchin border point is related to this limitation.	
31 "The Timing of TCRs planned cannot be guaranteed and is subject to changes relating to international TCR coordination, financing and other considerations." That's fair. However, one of the main goals of TTR is to produce a stable set of available train paths fairly early in time. I'd love to see a comparison between the list of TCRs listed here, and the final set of TCRs carried out in 2029 (so that evaluation can only be made early 2030). Is it really feasible and valuable to create a list of TCRs this early? I'd say that would be a great topic of "testing" TTR, and should hence be explicitly in scope of the TTR implementation and stated in this document.	Additionally, the lack of information concerning the HS line was due to an oversight during the data-gathering process and insufficient vigilance. The agreed input for the HS Franco-Belgian border, confirmed by relevant parties, is as follows: Wannehain – Espelchin: 5 (Long distance). This issue has been flagged for further coordination and will be taken into account in future updates of the Common Capacity Strategy. Further harmonisation is expected with the implementation of the upcoming EU Capacity Regulation.	
32 We are currently working together on the implementation of TTR. ProRail seems to imply ProRail is the main designer of the network. However, currently NS and ProRail work intricately together to make the best possible network plan for the Dutch railway system - better than any of us could do on its own. We kindly request to rewrite this section in order to reflect the current way of working and current Dutch legislation. We appreciate that all of this may very well change due to TTR, but that's not the current way of working.	For future Capacity Strategies, options will be considered to improve navigation, for example by enhancing the use of headings, bookmarks, or other PDF features to facilitate easier access to the information of interest.	
33 As we're currently working towards a final implementation of TTR, I'm really curious to read about the findings of each IM in working towards TTR. What are the main challenges faced, what are the improvements made compared to last version? Now the only sentence I read in the complete 100+ page document is "After the positive last year experience, it was decided to...". That's quite meager.	There are already ideas to improve the readability of the document by adding filter options and interactive maps.	
34 "The Timing of TCRs planned cannot be guaranteed and is subject to changes relating to international TCR coordination, financing and other considerations." That's fair. However, one of the main goals of TTR is to produce a stable set of available train paths fairly early in time. I'd love to see a comparison between the list of TCRs listed here, and the final set of TCRs carried out in 2029 (so that evaluation can only be made early 2030). Is it really feasible and valuable to create a list of TCRs this early? I'd say that would be a great topic of "testing" TTR, and should hence be explicitly in scope of the TTR implementation and stated in this document.	The common document is in English to have common understanding among all participating IMs and to publish a document that is readable for all applicants. In the EU-Regulation is stated that documents for the Capacity Strategy, Model and Supply shall be made available by the infrastructure manager in at least two official languages of the Union. It has not yet been decided which languages these will be, but it is likely that they will be English and the national language of the IM.	
35 We would, of course, like to hear when there is more clarity about the impact on planned work in the coming years – especially since we are also receiving signals that the current portfolio is feasible and that the discussions about (under)instability and disruption do not yet give cause to assess the feasibility differently.	The capacity strategy should incorporate experience gained during its elaboration, including subsequent steps. There is a need to include and coordinate a section on good practices collected from individual IMs.	
36 We do not recognize this. We do recognize the 30-day periods for Zuidweg and any additional viaducts as early as 2028, but not that each subsequent viaduct will take another 30 days, in separate TCRs. Is this correct?	The country-specific implementation efforts of each IM are not in scope of this document, since the CS is only one of many elements of TTR. Most IMs have a project website that details further what progress and convergence steps the IM is following between TTR and the EU-Regulation in the future. The overall TTR implementation scope can be found on the website of RNE, in the document called "Scoping Document 28-29": https://ne.eu/workshop-on-ttr-implementation/	
37 Must be simultaneous with 's-Hertogenbosch - Houten Castellum	For specific questions, please refer to the list of contact details at the start of the document.	
38 Is this really about Zeevaar - Emmerich being closed or about work in Germany?	Both in the TTR world and in the scope of the EU Reg 443, a so-called "pre-announcement of TCRs", including for a time with great uncertainty is foreseen. Notably, the official publication occurs only at v-24 so about a year after the publication of the CS document. The pre-announcements, therefore, have to be taken as indicative only with limited stability. The use of the information contained therein is an individual RU decision.	
39 Thank you very much for the publication of the Common Capacity Strategy for 2029. It's a very comprehensive document showing many details.	Regarding the TCR Guidelines, they should remain broad and non-restrictive to cover basic aspects accepted by all involved IMs. For TCRs related to individual rail networks, responsibility lies with the responsible IM, which is bound by national processes such as tendering, financing, and traffic management. We see international TCR coordination as beneficial – a desirable goal that has not yet been achieved because it is not pursued with the same intensity as individual national interests.	
40 Switzerland and Belgium are missing. Both of these countries are part of the North Sea Rhine Med Corridor, which is the one with the most traffic in Europe. Even if they publish in a different document, it is absolutely essential that capacities are coordinated and harmonized.	Both in the TTR world and in the scope of the EU Reg 443, a so-called "pre-announcement of TCRs", including for a time with great uncertainty is foreseen. Notably, the official publication occurs only at v-24 so about a year after the publication of the CS document. The pre-announcements, therefore, have to be taken as indicative only with limited stability. The use of the information contained therein is an individual RU decision.	
41 Please use unique numbers to facilitate the finding the corresponding project on the map and in the Table (for example "DE-9" and "IT-9" instead of "9" twice).	Both in the TTR world and in the scope of the EU Reg 443, a so-called "pre-announcement of TCRs", including for a time with great uncertainty is foreseen. Notably, the official publication occurs only at v-24 so about a year after the publication of the CS document. The pre-announcements, therefore, have to be taken as indicative only with limited stability. The use of the information contained therein is an individual RU decision.	
42 Working Groups on TCR:	With the 'above' is meant the supply driven approach.	
43 Specifically, to the Rhine Valley Group: Since the big closures on the Rhine need detour lines via France, SNCF Réseau shall be added to this group.	The feedback has been taken into account. Currently, no changes to the border groups are foreseen.	
44 The Rhine Valley Closures in 2028 and 2029 are missing, although they are the most major TCR on the North Sea Rhine Med Corridor in the coming years.	The scope of the TCRs included is described in the beginning of chapter II and has been reduced to such TCRs with a certainty of being implemented to condense the document down.	
45 Please refer to the Annex VII categories as filter for the TCR in the table (Major impact= more than 30 consecutive days, More than 50 % of the estimated traffic volume on a railway line per day). Otherwise, is remains unclear what TCR were selected and how reliable the information is. Annex VII categories	The feedback will be taken into account to allow a filtering between major and high and high TCRs in the list in future.	
46 Please use unique numbers to facilitate the finding the corresponding project on the map and in the Table (for example "DE-9" and "IT-9" instead of "9" twice).	Adding additional text for the IDs in the geographic submaps will enlarge the rectangles with IDs. This is not feasible on all lines and nodes. As alternative we can clarify the submaps by displaying the name of the country more clearly.	
47 Expected traffic flows: The table with the border Points Germany-Switzerland is missing	The scope of the TCRs included is described in the beginning of chapter II and has been reduced to such TCRs with a certainty of being implemented to condense the document down.	
48 With the disappearing traffic of "RoLa" going from Novara – Freiburg, there most probably will be no demand for the part Basel – Freiburg only. This path needs to be prolonged.	From the RFI side, the path is still available and also accessible for non-RoLa services. The track remains available even if it is not used for RoLa.	
49 Expected traffic flows:	It appears to be an error in the visual interpretation of the traffic flow map, namely that both in the CS 2028 and the CS 2029, the map shows 9 paths every two hours, i.e. 4,5 paths every hour. There is no deviation between the CS28 and CS29 in this regard.	
50 Formatting of the Document: As it is a large document: Please format the titles, such that they can be navigated easily with any PDF reading programme (not only links to titles but also tool-interior navigation).	For future Capacity Strategies, options will be considered to improve navigation, for example by enhancing the use of headings, bookmarks, or other PDF features to facilitate easier access to the information of interest.	
51 Missing link on page 95	There are already ideas to improve the readability of the document by adding filter options and interactive maps.	
52 The comments referred to the national version of the document: One of the comments was why the document is not legally binding. Carriers would like it to be legally binding, primarily because of TCR.	Link will be restored.	
53 Geographical framework – the missing border crossing Središće – Čakovec, which is important as a bypass line	The EU-Regulation on Capacity Management will become legally binding from timetable 2031.	
54 We require a clear list of terminals, facilities, and tracks (when operated by the operator, when operated by another entity); transparent access is expected.	Facility managers are required by Regulation 2017/2177 to transmit data to the infrastructure manager. The Network Programme publishes all previously received data from operators of service facilities. In future Network Programmes and Capacity Strategies, we expect to make additions in this section in accordance with the changes to the Manuals for the production of the documents resulting from the requirements of the new capacity regulation.	
55 Capacity expansions – the carrier states that the recorded situation does not reflect the real; Tivoliški lok, Jesenice (freight part), extensions in Koper, Dobova, Selana, Hodol, the MB-Sentj project, etc., are missing.	The envisaged capacity expansions are based solely on data on investment projects provided by the Ministry of transport and will be implemented by 2029. IM does not carry out the tasks of the development of the NPI and does not decide on investments. However, we have repeatedly commented on the necessity of upgrading stations and sections of lines and the construction of bypass stations at the Ljubljana junction.	
56 TCR – desire for better coordination of TCR and comments that reroutings are not realistically applicable; restrictions on lines 20, 60, 62, 80, 44 are mentioned.	On sections where TCRs are not planned at the same time, is in the capacity strategy primarily intended to provide information about possible rerouting. The principles and sequence of train path planning are set out in handbooks and regulations, which the IM must take into account when drawing up the timetable and managing traffic. As regards train paths on corridors, these are allocated by the C-055 of the corridor in accordance with orders from RUs and are largely taken into account.	
57 Principles of planning – too much priority for passenger traffic; PaPs capacities are not sufficiently offered.	The parameters of the trains are determined according to the maximum loads of the locomotives, the data of which must be provided by the RUs. Given that new locomotives appear on the market by RUs, in most cases we do not receive all the necessary data on traction and locomotive power in time, which makes it impossible to take this into account in the allocated train paths. At most stations of the J2 network, the useful length of station tracks is shorter than 600 m, so it is not possible to meet longer trains on individual sections of the line. Therefore, in practice, the range from 400m to 600m is adjusted to the actual available infrastructure and the operational needs of traffic management. If we were to unify the length to 600m, it would mean a smaller number of capacities	
58 Capacity model – questions about weight limits (1580 t), length of trains (400-600 m) and impact of separate agreements.	A hybrid approach is used to prepare traffic flows for the capacity strategy and model. Traffic flows in the 2029 strategy are based on the number of trains in 2026 and the existing throughput of individual border crossings or lines, and are coordinated with neighbouring IMs, as well as anticipated upgrades that reduce line capacity. CNA will also be taken into account when developing the capacity model, allowing all applicants to contribute to more accurate strategic planning, thus helping to identify capacity bott	