

**ERC GmbH**

Waagner-Biro-Str. 125  
8020 Graz  
Austria

[schmid@e-r-c.at](mailto:schmid@e-r-c.at)

[www.e-r-c.at](http://www.e-r-c.at)

Dr. Fabian Schmid

M +43 (699) 19080659

T +43 (316) 228454

F +43 (316) 228454-15

Date: 11 July 2013

EIN AT/30/0212/0001

To

DI Günter Petschnig

PJM GmbH

Waagner-Biro-Str. 125

8020 Graz, Austria

**Re: Installation of the freight wagon tracking system “Waggon-Tracker” with mobile maintenance unit**

The statement of the ECM certification body ERC GmbH refers to the product “WaggonTracker” and discusses the question whether the installation of a WaggonTracker with a mobile maintenance unit fulfils all requirements of the ECM Regulation. [1,2] confirm that the installation of the WaggonTracker complies with EN 15437-1 and TSI WAG (2009/107/EC) as long as [3] is complied with.

The opening of the wheelset bearing housing is to be classified as a critical proceeding that may have several negative effects on the behaviour of the bearing, including bearing failure and the associated fatal consequences. Detailed instructions on how to handle this process are outlined in several regulatory documents, all of which are mandatory as outlined in [3, Chapter 1].

In principle, ERC cannot see any reason why the WaggonTracker should not be installed outside a workshop. However, it must be ensured in all cases that the installation does not harbour any relevant safety risks.

To ensure this, the following – by no means exhaustive – recommendations should be taken into account as minimum safety requirements:

- Risk assessment of WaggonTracker installation and use. The evaluated risk must be sufficiently low and must be acceptable to the parties concerned (e.g. owner, operator, ECM); including the assessment itself.
- The party carrying out the installation must be authorised to do so (approval/commissioning by e.g. owner, operator, ECM).
- Complete instructions for WaggonTracker installation are available.
- The installation is performed by a sufficient number of trained and competent staff.
- The wagon must be unloaded, positioned on a level track and be secured accordingly.
- The working environment corresponds with all safety instructions and requirements. This relates in particular to access to the wagon (especially the wheel bearing), ground consistency, dust, weather, temperature etc.
- Appropriate tools and, where required, calibrated measuring equipment, are available to the staff.
- All processes are documented and this information is then passed on to the relevant bodies that may have a justified interest in it. These may include: authorities, ECM, ECM maintenance development, operators, workshops, public utilities, infrastructure managers...

Other applicable documents:

[1] Certificate ACR/B 13/185 from 25 June 2013, issued by TÜV Rheinland Inter Traffic GmbH

[2] Report ACR 13/185

[3] Instruction Manual\_1\_e\_2012-12-21\_RO.pdf

It is the responsibility of ECM to ensure that installation is performed in compliance with the latest technological findings, all applicable rules, regulations and instructions and that the safety of the wagon after installation is maintained.

Best regards,

Dr. Fabian Schmid

<<*signature*>>

ERC GmbH

Waagner-Biro-Strasse 125

8020 Graz

ATU 65722300, FN 342684y

[www.e-r-c.at](http://www.e-r-c.at)