New Generation Rollingstock Project

Response to public submissions received by the Australian Human Rights Commission to the temporary exemptions application

9 February 2018

Joint response by the State of Queensland (acting through the Department of Transport and Main Roads) and Queensland Rail
1. EXECUTIVE SUMMARY

(a) The Department of Transport and Main Roads (TMR) and Queensland Rail (the Applicants) acknowledge the views expressed in the 20 public submissions received by the Australian Human Rights Commission (the Commission) in relation to the application for temporary exemption for the New Generation Rollingstock (NGR) trains from the Disability Standards for Accessible Public Transport 2002 (DSAPT) and Disability Discrimination Act 1992 (DDA) in respect of certain access paths in the train and the internal configuration of the toilet (the Application).

(b) The public submissions demonstrate that public transport, and in particular public transport provided by rail, is important to a large section of the population with disabilities. The Applicants acknowledge this, and agree that public transport must be accessible to as many members of society as possible.

(c) The State of Queensland has recognised the need for rectification work to resolve non-compliances (as far as possible), and has committed funding for this to occur over the next three years. Notwithstanding the identified non-compliances, as the situation currently exists, the Applicants' view is that the balance of the public interest favours the granting of an exemption for the NGR trains while the rectification work occurs.

(d) Taking into account the importance of public transport to the community as a whole (and in particular, the features that make train travel preferable over other modes of public transport for people with a disability), the need to increase capacity on the network, and the Applicants' commitment to undertake the necessary rectification work, it is the Applicants' submission that the balance of the public interest favours the granting of an exemption.

2. BOARDING ASSISTANCE PROCEDURE AND GUARD LOCATION

2.1 DSAPT requirements for boarding assistance

(a) In respect of Part 8 of the DSAPT, the Applicants are only seeking an exemption from the requirements of section 8.2, because assisted boarding can only occur through a single door (rather than all doors) of an NGR train, with equivalent access being provided at an alternative door if boarding through the nominated door is not available.¹

¹ The current Australasian Rail Association exemption granted by the Commission provides an exemption in respect of these DSAPT requirements for Queensland Rail's station infrastructure and current fleet.
2.2 Concerns raised regarding location of the guard cab and assisted boarding procedure

(a) The NGR trains are configured as a single six-car set with a driver / guard cab located at each end of the train. This design is different from the other trains in Queensland Rail's fleet, which are three-car sets with cabs at each end. For these older trains, when joined into a six-car train, the Guard is located in one of the middle cabs. Otherwise, for a three-car set, the Guard is located in the last cab of the train.

(b) The assisted boarding point is located in approximately the middle of the platform at the majority of Queensland Rail Citytrain stations. It aligns with the first door of the fourth car (six-car train) or the last door of the third car (three-car train), which are adjacent to the guard cab on other trains in the Queensland Rail fleet.

(c) The design of the NGR trains means that Queensland Rail will provide boarding assistance for the NGR trains differently than it does for its older fleet. In particular, Station Customer Service employees have the primary responsibility for providing boarding assistance for NGR trains, rather than the Guard (who provides boarding assistance for other services).

(d) A number of public submissions have raised concerns with the location of the guard cab, and the effect that this will have on the operational model for boarding assistance for the NGR trains. Many of those public submissions have acknowledged that the location of the guard cab is not an issue governed by the DSAPT. As such, the Applicants confirm that no temporary exemption is sought in respect of the location of the Guard or the assisted boarding procedure.

(e) The Applicants acknowledge that some public submissions have expressed a view that the operational model for the NGR train will result in discriminatory outcomes for people with disabilities.

(f) For the reasons set out below, it is the Applicants' view that the operating model used for the NGR trains will not result in discriminatory outcomes for people with disabilities.

(g) The operating model that Queensland Rail will use to provide boarding assistance for the NGR trains is not dissimilar to the operating models adopted by other rail operators. By way of example, a table setting out the operating models adopted by other operators is set out in Annexure A.
2.3 Assisted boarding procedure

(a) The boarding assistance procedure outlined below is currently in operation on the Gold Coast and Airport lines. During the initial NGR service period, Queensland Rail is conducting regular reviews of the procedure to ensure that the model is efficient and customers receive assistance.

(b) The assisted boarding points at Queensland Rail’s stations will not change for the NGR trains. This will provide consistency for those customers requiring boarding assistance, in that they will wait at the same point at a station no matter what type of train is providing a service. The assisted boarding point at stations is usually close to other access features, including the emergency and disability assistance phone, hearing aid loops, audio and visual timetable information and lifts.

(c) All stations and the NGR trains are equipped with boarding ramps that comply with the DSAPT. Station Customer Service staff and Guards are trained in their use.

(d) Each car is equipped with a passenger intercom system (using the Emergency Help Point buttons). Intercom units are located throughout the trains, including the allocated spaces and the toilet module.

(e) The NGR trains also have ‘Press for Assistance’ buttons which alert Guards to a customer requiring assistance. Guards can then make use of the installed CCTV cameras to identify the customer requiring assistance and make contact.

Boarding assistance

(f) The assisted boarding procedure for the NGR trains is as follows.

(i) Station Customer Service staff will monitor the assisted boarding points prior to the arrival of an NGR service, and ask if customers in the area would like boarding assistance. Station Customer Service staff receive training so that they understand that not all disabilities are visible.

(ii) At the time of boarding, Station Customer Service staff will ask customers which station they will be disembarking at. Station Customer Service staff are aware of station access and any current lift outages so they can provide this information to customers at boarding. Station Customer Service staff will also advise the customer to use the passenger intercom system (Emergency Help Point) to advise if they decide to change their destination during their journey.
(iii) When the NGR train arrives, the Station Customer Service staff will use the boarding ramp as required to assist the customer to board the service into the accessible car.

(g) For those stations with multiple platforms, NGR services will be timetabled to platform allocation to ensure Station Customer Service staff are available at the assisted boarding points for the NGR services.

(h) In the unlikely event that the Station Customer Service staff are dealing with an emergency and unable to be at the assisted boarding point at the time of arrival of an NGR service, NGR Guards have been trained to monitor the platform and provide assistance as required.

**Alighting assistance**

(i) Immediately following boarding, Station Customer Service staff at the boarding station will communicate any customer assistance requirements directly to the Station Customer Service staff at the destination station/s, as well as the 'Customer Service Interface' representative who is located at Queensland Rail's Rail Management Centre. The information provided will include details of the following information:

(i) the originating station;

(ii) the NGR train number, and in which train car the customer is located;

(iii) the destination station; and

(iv) what type of alighting assistance the customer requires, including whether the boarding ramp is required at the destination station.

(j) The Customer Service Interface representative will notify both the Station Customer Service Staff at the destination station and the NGR Guard of the above information.

(k) If a customer changes their destination station during their journey, they can use the passenger intercom system (Emergency Help Point) to notify the Guard. The Guard will contact the Customer Service Interface representative, who will notify both the Station Customer Service staff at both the original destination station and the new destination station.

(l) Station Customer Service staff at the destination station will be waiting at the assisted boarding point to provide assistance as required by the customer.
**Boarding assistance procedure at unstaffed stations**

(m) Where a station is unattended, the Guard will provide boarding assistance.

(n) As part of their NGR training, Guards have received training to ensure that they are particularly alert to customers requiring assistance at unstaffed stations.

(o) When arriving at an unattended station, the Guard will use the 12 external body-side CCTV cameras on each NGR train to identify whether there are any customer/s waiting at the assisted boarding point.

(p) The Guard will then provide assistance, including asking the customer for their destination station, and notifying the destination station. Once the NGR train leaves the platform, the Guard will then contact the Customer Service Interface representative and inform them of the destination station and assistance requirements.

(q) Where a customer's destination station is unstaffed, the Customer Service Interface representative will notify the NGR Guard of the destination station, and the NGR Guard will provide assistance to alight.

(r) Queensland Rail’s communication campaign to educate customers about the new boarding assistance procedure for NGR services has previously been provided to the Commission.

2.4 **Other methods to obtain assistance**

(a) In addition to face-to-face communication with Queensland Rail Station Customer Service staff on platforms, customers can use the passenger intercom system (Emergency Help Point) on board the NGR trains to speak directly to the Guard at any time.

(b) Queensland Rail has a 24/7 phone number, and text messaging service that allows customers to directly text Rail Management Centre staff to ask for information including services, disruptions and access. Additionally, the majority of Citytrain stations have emergency help phones on platforms which customers with disabilities can use at any time. This does not mean that customers are required to pre-plan their journey – it is assistance that is available if it is required.

(c) Queensland Rail also runs quarterly rail safety and orientation days at Roma Street station to familiarise customers who require assistance with the train fleet. Customers are able to practice boarding, disembarking and moving through the carriage in a controlled environment on these days.
2.5 Feedback on the boarding assistance procedure

(a) Queensland Rail encourages feedback from customers so that it can continually improve its service. People with a disability are encouraged to contact Queensland Rail to provide feedback, both positive and constructive, on the NGR service.

(b) Queensland Rail appreciates the feedback that Vision Australia provided in its submission in respect of the need for staff to verbally identify themselves. This feedback has been passed onto Station Customer Service Staff.

(c) Similarly, Queensland Rail investigated the complaint that it received from Mr Donohue in January 2018 (attached to the Addendum Submission provided by the Accessibility Reference Group), and issued reminders to Station Customer Service staff to:

(i) maintain an awareness of the assisted boarding point, and to approach any customer within this location when an NGR train is arriving at the station, including regular customers who have previously informed staff that they do not require boarding or disembarking assistance; and

(ii) identify themselves as part of the Queensland Rail team when speaking with someone who has a vision impairment.

(d) Queensland Rail's response to Mr Donohue is set out in Annexure B.

(e) While the assisted boarding procedure is being implemented, Queensland Rail is conducting regular reviews to ensure that the model is efficient and meets the needs of customers.

2.6 Clarification about communication of MA and MB car boarding location

(a) Paragraph 6.8(d) of the Application states that to mitigate any hardship which might result from the temporary exemption, Queensland Rail will communicate boarding locations (MA car – no toilet access or MB car – with toilet) for each station platform on its website. This paragraph was intended to convey that the assisted boarding point at each station would be communicated on its website.

(b) Unfortunately, it is not operationally possible to communicate the locations of MA car and MB car at each station platform on Queensland Rail's website. Due to the bi-directional operation of the NGR trains, it is not possible to identify the carriage locations at stations in advance. On occasions it may be necessary to make-use
of a ‘turn out’ on the network to change the direction of trains’ mid-journey.

(c) The Applicants apologise for this confusion in the wording of this paragraph of the Application. Paragraph 6.8(d) should read: 'Finally, Queensland Rail will communicate information to assist customers to identify assisted boarding points for station platforms on the Queensland Rail website.'

(d) Although Queensland Rail is unable to communicate the location of the MA and MB cars on its website, station staff at the designated boarding point at each station platform are able to advise customers about the location of the MA or MB car for a particular service.

2.7 **Boarding at single door**

(a) The Application seeks an exemption from:

(i) Section 2.6(1) of the DSAPT in respect of the access path from the NGR train doors; and  

(ii) Section 8.2 of the DSAPT in respect of the requirement to have a manual assisted boarding device (ramp) available at any accessible entrance.

(b) An exemption has been requested on the basis that the nominated assisted boarding point on station platforms only aligns with one door of the NGR train (and all of Queensland Rail's existing fleet).

It is not possible for Queensland Rail to provide boarding assistance at each door of the NGR train. This is because station infrastructure restrictions mean that the required manoeuvring area is not available at all locations of certain platforms. Therefore, assisted boarding must occur through a single door (rather than all doors) of an NGR train, with equivalent access being provided at an alternative door if boarding through the nominated door is not available.²

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² The current Australasian Rail Association exemption granted by the Commission provides an exemption in respect of these DSAPT requirements for Queensland Rail's station infrastructure and current fleet.
3. **IT IS NOT IN THE PUBLIC INTEREST TO WITHHOLD THE NGR TRAINS FROM SERVICE UNTIL COMPLETION OF RECTIFICATION WORK**

3.1 The Applicants submit that it is not in the public interest for the NGR trains to be withheld from service until the completion of the rectification work as:

(a) although there are some identified non-compliances with the DSAPT, the NGR trains are substantially accessible to customers with a disability;

(b) the significant public interest in maintaining and improving the capacity of South East Queensland’s passenger rail network for all customers, including those with disabilities;

(c) withholding the NGR trains from service is likely to incur costs for the State of Queensland under the Public Private Partnership (PPP) contract; and

(d) the NGR trains include a wide range of new and improved features for all customers.

3.2 **Accessibility of current NGR design**

(a) The Applicants believe that the assisted boarding procedure outlined at section 2 for the NGR trains will enable customers with a disability to safely board and alight from the trains.

(b) Internally, there is a compliant access path from the door used during the assisted boarding procedure and six allocated spaces. In the MB car (with the toilet), there is a compliant access path from those six allocated spaces to the unisex accessible toilet module.

3.3 **Benefits of maintaining capacity of the South East Queensland rail network**

(a) It is clear from a number of the public submissions that a significant number of people with disabilities prefer train travel to other modes of public transport. Notwithstanding the non-compliances that are being rectified, train travel offers benefits for people with disabilities that other modes of public transport do not, including:

(i) audible station announcements made two minutes before a train arrives, advising customers of the trains’ destination and which platform to go to, followed by another station announcement as the train arrives at the platform;
(ii) visual information provided on screens showing the service departure time, final destination and the platform from which the train can be boarded;

(iii) hazard tactile indicators installed along the platform edges to assist customers with a vision impairment;

(iv) a centralised assisted boarding point from which customers receive assistance to board a train;

(v) ticket counter and platform hearing loops at some stations, to assist customers with a hearing impairment to access information about train arrivals and departures;

(vi) timetable consoles at certain stations which provide audible and visual information about the next inbound and outbound trains stopping at the station;

(vii) the availability of Customer Service staff at many stations, who are able to provide customers with face to face assistance prior to a customer boarding the service, and after a customer alights from a service;

(viii) emergency and disability assistance phones at some stations; and

(ix) accessible toilets at many stations.

(b) As set out in the Application, the NGR trains are needed to enter service to replace an aging portion of the Electrical Multiple Units (EMU) that need to be retired as soon as possible. A comparison of EMU and NGR train features is set out at Annexure C.

(c) Some of the public submissions suggest that while the EMU trains are aged, they remain serviceable. It is correct that the EMU trains will remain in operation during the 2018 Commonwealth Games. However, the EMU trains currently experience age-related defects with obsolescence of critical systems and components, which is a major contributor to performance deterioration. Prolonging the life of the EMU trains creates increased risk of significant network failure.

(d) If the NGR trains be prevented from entering service, there will not be any replacement for the EMU trains, which will significantly reduce the service capacity of the rail network due to a shortage of rollingstock.

(e) The Applicants do not believe it is in the public interest to delay the NGR trains from entering service until the rectification work occurs.
3.4 Additional costs to the State of Queensland

(a) There are currently 25 NGR trains in Queensland. A further 13 trains are either in construction or are being transported to Australia, and construction of the remaining 37 NGR trains has commenced at the manufacturing facility. Storing these NGR trains, unused, for a length of time (between 18 and 36 months) is not desirable both due to the impact on network capacity (as outlined above) and the likely contractual impacts.

(b) As per the PPP contract, the State of Queensland pays the NGR train supplier a sum of money each month when they are ‘ready and available’ regardless of whether they are being used in operation or not. This may also extend to maintenance payments.

(c) These are complex contractual obligations that may incur additional costs to the State of Queensland.

3.5 The NGR trains include a wide range of new and improved features for all customers

(a) Features of the NGR trains include:

(i) Queensland Rail Wi-Fi in all six-cars;

(ii) high-backed seats designed to improve crash safety performance for passengers;

(iii) twelve clearly marked allocated spaces for people who use mobility aids (six in each of the train’s third or fourth cars);

(iv) twenty-four clearly marked priority seats (four seats with armrests per car);

(v) hearing aid loop system in all six cars of the train;

(vi) maximised aisle widths in the MB car due to longitudinal seating;

(vii) on-floor photo luminescent (or glow-in-the-dark) markings for emergency evacuations;

(viii) passenger information displays (PIRs) internally and externally that will display approaching station/destination information;

(ix) passenger information announcements with high quality audio; and

(x) fifty-three internal and external CCTV cameras for passenger and train crew safety and security.
4. CONSTRAINTS OF THE NARROW GAUGE NETWORK

4.1 As set out in the Application and further information provided to the Commission on 15 November 2017, the NGR trains will operate on Queensland’s existing narrow gauge network, which limits the width of the train and impacts on the internal configuration.

4.2 Some of the public submissions dispute that the design limitations imposed by the narrow gauge network impact on the toilet module design. The Applicants submit that these public submissions misunderstand the impact and physical constraints of the narrow gauge network.

4.3 **Width of adjacent aisle**

(a) Because the NGR is a fixed six-car unit, a thoroughfare is required between all cars. The requirement to fit both a toilet module and an adjacent path requires a balance to be struck between the proportion of the car width allocated to the toilet module’s circulation space and the proportion allocated to the adjacent aisle width.

(b) Increasing the aisle width beside the toilet module will necessarily reduce the circulation space inside the toilet module and lead to further reduction in toilet compliance and functionality. This means that at some places, the access path is limited to no wider than 600mm.

(c) Some of the public submissions compare the NGR design with other trains in Queensland Rail’s fleet. However, there are some key differences between the trains which limit the value of any such comparison. Within Queensland Rail’s existing fleet:

(i) for the trains with toilets (the IMU trains), the toilet module on these three-car trains is located directly next to the guard cab, and there is no access path (as defined by the DSAPT) because only train crew use that passage;

(ii) no other trains in Queensland Rail’s fleet (including the EMU trains) have a toilet module, and therefore do not need to balance the width of the toilet module with the width of the adjacent access path.

(d) One public submission raised a concern regarding emergency evacuation due to the narrow adjacent aisle. Queensland Rail has emergency evacuation procedures in place that take into account the path adjacent to the toilet module.
4.4 Toilet module design

(a) The Applicants acknowledge that the NGR toilet module (as constructed) does not meet the requirement for an 1150mm clearance between the centre line and far wall. The NGR toilet is being re-designed as part of the funded rectification works.

(b) During the design phase, a detailed engineering assessment was undertaken on both a ‘curved’ and ‘flat’ entrance to the toilet module. It was not possible to have a ‘flat door’ wide enough to meet access path requirements (850mm) without further compromising the width of the adjacent path.

(c) The NGR toilet module is a very similar design to the IMU160 toilet module. The IMU160 toilet module is covered by the current Australasian Rail Association (ARA) temporary exemption for trains operating on a narrow gauge track.

(d) The curved door design and toilet pan placement shared between the two module designs means their functionality with respect to a parallel transfer is substantially similar.

(e) Given that the current NGR toilet module provides the same functionality as the IMU160, the Applicants submit that providing a temporary exemption which is comparable with that for the IMU160 train does not provide an overall detrimental outcome.

(f) One of the public submissions submits that the IMU120 toilet module, with its ‘flat door’ entrance, demonstrates that an internal design which meets the DSAPT requirements can be achieved. However, the adjacent path to the guard cab in the IMU120 does not meet (and is not required to meet) the DSAPT access path dimensional requirements. The entrance to the IMU120 toilet module is also subject to the ARA temporary exemption.

(g) As mentioned above, in order to achieve a DSAPT compliant ‘clear opening’ entrance to the toilet module (without further compromising the adjacent path), later model IMU trains and the NGR trains have ‘curved’ doors.

5. Consultation during procurement and design stages

(a) As per the Application, there were 13 consultation sessions with the disability sector (two of which were at a mock-up of the NGR train) during the design phase of the project. Through this process, there have been a number of lessons learnt.

(b) As has been identified in submissions, it is important that lessons are learned from the consultation process undertaken, and implemented in future processes. The Applicants would like to
assure the public and the Commission that in accordance with the Queensland Government's Project Assessment Framework, an evaluation will be undertaken at the completion of the project to specifically identify these lessons learned to improve future procurement processes.

6. CERTAINTY AND TIMETABLE FOR PROPOSED RECTIFICATION WORK

(a) There are currently 25 NGR trains in Australia. A further 13 trains are either in construction or are being transported to Australia, and construction of the remaining 37 NGR trains has commenced at the manufacturing facility.

(b) All 75 NGR trains will be built to the existing design specifications and then rectified in Queensland.

(c) A detailed plan that outlines each step of the rectification process and timeframes will be provided to the Commission and released publically as soon as it is available.

(d) The contractual environment and the requirement to carry-out rectification work in Queensland add complexities to the rectification process that the Applicants are working to resolve quickly in order to finalise the plan.

(e) The Applicants and the Queensland Government remain committed to carrying out the rectification work, with design work already underway in preparation for further consultation with the disability sector and other key stakeholders in the coming months.

(f) Some of the public submissions raise a concern that the Applicants will simply seek to extend the temporary exemption indefinitely. However, after the rectifications are undertaken as anticipated above, the only further temporary exemption required will be in respect of boarding to a single door.

7. OTHER CONCERNS RAISED IN THE PUBLIC SUBMISSIONS

7.1 Some public submissions have raised concerns regarding internal signage - signage within the NGR train meets DSAPT requirements.

7.2 One public submission raised concerns regarding an apparent inconsistency with priority seating locations in the NGR trains. Priority seating locations are not mandated within DSAPT, and differ in location due to the layout of the cars:

(a) In four cars (two TB and two DM) the location of the priority seating is consistently located directly adjacent to the vestibule;
(b) In the MA car, priority seating is located next to the allocated space directly adjacent to the allocated space; and

(c) In the MB car - priority seating is located next to the allocated space directly adjacent to the allocated space.

7.3 The location of the priority seating and allocated spaces in the two accessible cars (MA and MB) was consulted on during the design phase of the project.

7.4 During the rectification work process, these other design issues (including signage, priority seating and other seating and allocated space layouts, the location of the fire extinguisher, the Call for Assistance Button and Emergency Help Points) will be reviewed to determine whether any functionality improvements can be made.
### ANNEXURE A– OPERATING MODEL OF OTHER OPERATORS

<table>
<thead>
<tr>
<th>Sydney Trains</th>
<th>Melbourne Metro</th>
<th>Perth</th>
<th>Adelaide</th>
</tr>
</thead>
<tbody>
<tr>
<td>The most recently delivered train in the Sydney Trains fleet is the 'Waratah', which commenced service in 2011.</td>
<td>All trains on the Melbourne suburban network are driver-only operated. Guards were discontinued between 1993 and 1995.</td>
<td>Certain train stations are identified as Accessible Train Stations, and are fully accessible from the platform to the train.</td>
<td>Driver-only operations mean that the driver is responsible for the safe operation of the train, monitoring the platform-train interface, and providing boarding assistance.</td>
</tr>
<tr>
<td>On the eight-car Waratah trans, Guards are located in the rear cab, as these trains do not contain a centrally located crew cab – an external CCTV system is used to monitor the platform-train interface.</td>
<td>Drivers are responsible for the safe operation of the train, monitoring of the platform-train interface, and providing boarding assistance. Some assistance from Platform staff is provided at identified locations.</td>
<td>Boarding assistance is provided if customers provide notification one hour in advance of their intention to travel.</td>
<td>The assisted boarding point on the platform aligns with the first door behind the Driver.</td>
</tr>
<tr>
<td>On the remaining trains, the Guard is located in the middle of an eight car set, or at the rear of a four car set.</td>
<td>The assisted boarding point on the platform aligns with the rear of car 6 of a suburban train.</td>
<td>Customer Service assistants provide assistance at the boarding station and destination station – not the Driver or Guard.</td>
<td></td>
</tr>
<tr>
<td>The assisted boarding point on the platform aligns with the rear of car 6 of a suburban train.</td>
<td>At staffed stations, staff will provide boarding assistance in the first instance.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>At unstaffed stations, the Guard will provide boarding assistance.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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## ANNEXURE C– COMPARISON OF EMU AND NGR TRAINS

<table>
<thead>
<tr>
<th></th>
<th>EMU</th>
<th>NGR</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of trains</td>
<td>87 3-car sets</td>
<td>75 6-car sets</td>
</tr>
<tr>
<td>Accessible unisex toilet module located in the middle of train</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Aliquoted spaces (in 6-car set)</td>
<td>6</td>
<td>12</td>
</tr>
<tr>
<td>Hearing aid loop</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>CCTV</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>- 8 inch CCTV display (in driver's cab)</td>
<td>- 12 inch CCTV display (in driver's cab)</td>
</tr>
<tr>
<td></td>
<td>- Four cameras in each car</td>
<td>- Four cameras in each car</td>
</tr>
<tr>
<td></td>
<td>- No cameras on the outside</td>
<td>- Four cameras outside each car</td>
</tr>
<tr>
<td>Average aisle width</td>
<td>580mm</td>
<td>650mm</td>
</tr>
<tr>
<td>‘Call for assistance’ button</td>
<td>No</td>
<td>Yes, in each allocated space</td>
</tr>
<tr>
<td>Passenger emergency intercom</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Internal ‘Passenger Information Displays’ displaying approaching station/destination information</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>External ‘Passenger Information Displays’ displaying approaching station/destination information</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Passenger information announcements</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>