

Response template

EPC112-22

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European
Payments Council

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Public

Approved

Response template for the public consultation on the SEPA Payment Account Access Scheme Rulebook

1 Introduction

The European Payments Council (EPC) is launching a public consultation on the draft rulebook of its new **SEPA Payment Account Access (SPAA) Scheme (EPC012-22)**, which will run for a 90-calendar day period from 13 June up to and including 12 September 2022.

All interested stakeholders are invited to participate in the public consultation by including their comments on the draft SPAA scheme rulebook, in this template and emailing it to spaa@epc-cep.eu by 12 September 2022 (midnight Brussels time) at the latest. **Kindly note that the EPC will not consider any feedback received after this deadline.**

2 Contributor details

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Confidentiality:

The EPC will publish the received public consultation comments from all contributors including the name of each comment contributor's organisation on the EPC Website.

Please state if you wish the name of your organization to remain anonymous during the public consultation feedback review process and in the published public consultation comments report:

- YES, the name of my organisation should be anonymised
- NO, the name of my organisation does not need to be anonymised

3 Feedback on the draft SEPA Payment Account Access Scheme Rulebook (EPC012-22)

Rulebook section N°	Comment / Proposed new rulebook text (please indicate via track changes)	Reason for change
2. Business and operational model	<p><i>“<u>Process steps:</u> [...] <u>The high-level process steps could trigger several lower level implementation steps which are not described in the Rulebook. The low-level steps are out of scope and might differ from one API specification to another.</u>”</i></p> <p>Contrary to this paragraph, we consider that the SPAA Rulebook should include lower-level implementation guidelines as is the case with other EPC schemes, and hence this section should be updated.</p>	<p>The variety of PSD2 API standards across the EU, and the subsequent diverse approach to interpreting those standards, has led to a complex array of API implementations.</p> <p>To avoid future interpretation issues arising at both the API specification and implementation levels we believe that the SPAA Scheme should provide Rulebook interpretation and implementation guidance for scheme participants. This guidance can be developed as the Scheme evolves to support scheme participants, and the API standardisation initiatives.</p>
2.1.2.5 PFM automated transfers	<p><i>“<u>[...] transfers can only be done to accounts held by the same Asset User with the same Asset Holder and ii) those would not require SCA.</u>”</i></p> <p>Consider removing this section.</p>	<p>As this use case can be achieved using “DS-17 Dynamic recurring payments” data-set, it is unclear why the particular instance where the PSU wants to set up a regular payment to one of their own accounts (with the same Asset Holder) needs to be highlighted and included in the Rulebook.</p>
2.2.5 SCA exemptions and delegations implemented	<p><u>SCA delegated to Asset Broker</u></p> <p>As section 2.3 SCA Approaches of the Rulebook is developed, we support the inclusion of the datasets required to allow Asset Holders to</p>	<p><u>SCA delegated to Asset Broker</u></p> <p>A common framework for delegated SCA within the SPAA scheme will allow both Asset Holders and Asset Brokers to manage their risk, and create a common</p>

	<p>delegate SCA to the Asset Broker (and thus establish the basis for liability shift).</p> <p><u>Directory Service</u></p> <p>Clarify whether the provision of Directory Services will be provided centrally by SPAA Scheme, or open to the wider market of service providers in the infrastructure layer.</p>	<p>implementation approach, without which the market faces challenges with adopting delegated SCA models at scale. The SPAA MSG should therefore include these data sets and consider the liability rules within the Scheme.</p> <p><u>Directory Service</u></p> <p>The current wording of this section notes that who provides a directory service is still to be determined, this is a critical service for supporting the implementation of the SCA exemption features and may impact on the commercial model of the Scheme, and so should be fully considered in the first Rulebook.</p>
2.3 SCA Approaches	<p>As this section is developed, we suggest including requirements and guidance for Scheme participants on optimising the SCA experience for both online and offline retail payment use cases (at point of sale).</p>	<p>The SPAA scheme provides a unique opportunity to develop common best practice standards for conducting SCA when initiating a payment under the SPAA scheme at the physical point of sale (POS) or e-commerce.</p> <p>Common optimised flows for conducting SCA, regardless of the SCA method adopted by the Asset Holder, will create a cohesive SCA experience for payers and payees across Scheme participants, and will help drive PSU trust in new ways of making retail payments, and thus ultimately support the ERPB's vision of the SPAA scheme facilitating competition and innovation.</p>