ECOSYSTEM STRATEGY SPRINT 2 QUESTIONS

Submitted by:	Thaer Sabri
Company name:	Electronic Money Association
Choose one of the following: ASPSP/TPP/TSP OR OTHER	Other
Contact Details: email & mobile	
Permission to share submission with the Committee	Yes
Non-confidential version attached	Yes

We welcome evidence-based responses to the questions posed by the Joint Regulatory Oversight Committee (Committee). Please complete your responses in Word.

Written submissions will not be attributed to you, your firm or association and will be presented in any report on an anonymous basis unless otherwise requested by the contributor.

Please indicate above if you are happy for your submission to be shared with Committee members. If appropriate, please provide a non-confidential version for sharing.

Please focus your responses on those questions for which you have relevant evidence. It is not necessary for you to respond to all of the questions.

Please note the deadline for the written submissions by close of business on Wednesday, 23/11/2022

Section 1 - What do we need more evidence on ?

QUESTION 1.1
Primary research with consumers and businesses, with a particular focus on vulnerable customers and small businesses, to explore key issues in relation to trust, consumer behaviour, understanding and awareness of Open Banking. What questions should be included? Who could deliver this and what are the best methods to follow (e.g., survey, focus groups)?

Response

OBIE have undertaken primary research in the past where the ecosystem has identified a requirement for it, including the **Customer Evaluation Framework** which was designed to assess the impact of OB and whether it is delivering the intended end user outcomes under the CMA Order. We believe that the future entity could conduct primary research under similar circumstances should ecosystem participants need it to develop OB propositions, or if the research was to demonstrate to JROC that future OB +objectives are being met.

See also our response to Q4.1.

QUESTION 1.2
In relation to API availability and performance, including down time, response time, reasons for API failures, etc. What metrics and from whom should data in relation to conversion rates/consent success rates/ failed journeys be collected, to ensure a consistent picture across the ecosystem? How should this be

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

operationalised, including who should take this forward, in the short-term and on an ongoing basis as open banking+ develops? Should this insight be shared across ecosystem and what is the best way to do this?

Response

Data on API performance should be gathered from both TPPs and ASPSPs in the ecosystem to enable a complete and accurate picture to be drawn. We suggest that the future entity could be responsible for collecting this data, and promote ecosystem reliability and performance in-line with appropriate SLA's, by ensuring this data is transparent to all ecosystem participants. This could be achieved using a real-time dashboard which indicates the status of API availability and failure reasons across the ecosystem.

When ASPSPs opt to join the OBIE ecosystem, we consider that they should adhere to service level targets for API availability and performance which are appropriate for the API use case. In effect, this would be extending OBIE's recommended performance benchmarks (contained in the Operational Guidelines), and applying more stringent service level requirements where appropriate.

As a minimum, ASPSPs should already comply with regulatory requirements of providing APIs which match the performance and availability of their other channels. Where they consistently do not, enforcement action should be taken by the FCA. We believe that if OB retail payment are to offer a viable alternative to cards then APIs will require availability, capacity, and response times on par with card infrastructures to ensure merchant and consumer experience can be comparable and consistent across the ecosystem. However, APIs which support lower volume or less time-critical use cases could be subject to more flexible availability and performance service levels. However, consistency across the ecosystem for each use case is key to building consumer and businesses trust in the OB ecosystem.

Section 2 - What can we do in the short-term?[1]

QUESTION 2.1
Should TPPs and non CMA9 ASPSPs be required to adhere to the Customer Experience Guidelines/the rest of the Open Banking Standard? What are the costs to TPPs/non CMA9 ASPSPs to implement this? What are the pros and cons and what are the mechanisms for delivery?

Response

Multiple API standard initiatives have allowed firms to adopt the approach most appropriate for their business and IT infrastructure, in particular when they also operate in jurisdictions outside the UK. It has also allowed for vibrant API services and aggregator markets to develop. However, we are of the view that if a ASPSP or TPP does adopt the UK OB standards then adherence to the standards, CEG, guidelines etc, would be reasonable and compliance overseen by the future entity.

As outlined in our Sprint 1 response, the EMA considers that the single most important element of developing consumers and other end-user's trust in OB services, and in particular payments, will be the clear and consistent user experience within each possible use case. We believe that if the OB standards and guidelines continue to be designed as best in class, and are applied consistently by all ecosystem participants, then this will raise the game across the market and there won't be a need to require that all TPPs and non-CMA9 ASPSPs adhere specifically to OBIE's standards.

---

[1] "Short-term" is defined as 12- 18 months

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

QUESTION 2.1

To build trust and a broader understanding of open banking, what are the key aligned messages that all participants in the ecosystem should provide throughout the user journey when consumers and business are opting for Open Banking services, e.g., when users are providing consent or initiating a payment? Should there be consistent messages on safety of data and connection? What are the costs and benefits?

Response

As a general principal, the EMA believes that messaging and user experience should be a matter for each PSP to determine based on their branding and the voice they want to employ with their customers. However, our members report that the current approach taken to present risk warnings to the PSU during OB payment authentication and initiation flow within the ASPSPs domain can undermine users' confidence and trust in OB payments, particularly when generic fraud warnings are used, or language implies that using a third-party service may be less secure. This not only slows the adoption of OB payments, but raises competition issues within the ecosystem.

The resolution to this may require multiple approaches, from ASPSPs using transaction risk indicator data from TPPs in their fraud engines to better manage when fraud risk warnings are appropriate in an OB payment journey, to standardising the tone of messages so that the security of the ecosystem as a whole is not called into question.

We note that when the OB customer experience guidelines (CEG) were developed they included best practice on improving customer communications for data sharing with the objective of improving customer outcomes. Similar guidance <u>was not</u> developed for OB payments as the standards development was not as advanced at that time (2018). We therefore suggest that a review and comprehensive update of the CEG is undertaken by the future entity to ensure that they are fit for purpose, and include similar levels of guidance on OB payment messages, in particular, how fraud risk and security alerts in the payment journey are handled consistently across the ecosystem (ensured by requiring adherence to the updated CEG for all participants – see response to 2.1).

QUESTION 2.2

What use cases cannot operate without a dispute resolution system? Does this system have to be centralised or can it be decentralised and located in multiple places, depending on the use case and the functions that should be supported by the system? Why or why not?

Response

Introducing any new complaints handling procedures comes with significant operational overhead for PSPs and merchants. Where possible OB payments dispute resolution mechanisms should seek to build on current regulatory requirements and best practice, rather than introduce new obligations.

The future entity should be tasked with assessing the requirements for dispute management to support future OB Roadmap features which go beyond the OB/PSD2 perimeter. This should include identifying new dispute management procedures between ASPSPs and TPPs is necessary.

QUESTION 2.3

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

In terms of information sharing in times of crisis (e.g., a significant breach), should the future entity or another actor assume the role of a facilitator and coordinate necessary information sharing and any necessary remediation across ecosystem? What detailed information should be shared?

Response

No comment

QUESTION 2.4
Under the current standards, what are the fields / guidance that is currently optional should be adopted by all ASPSPs? And what information should TPPs pass on to ASPSPs that they are not obliged to today?

Response

We believe that defining changes to data fields and their application in the current standards are best analysed by technical expert groups. However, at a strategic level we do support the consistent application of the TRI data fields, and believe that on-going assessment and improvements to these fields should be conducted to improve fraud-data sharing.

QUESTION 2.5
For response messages and error codes, the lack of granular error information was mentioned as a concern by many TPPs in Sprint 1.
    a) TPPs and TSPs: please provide details of the priority additional data you would like to see, and when?
    b) All participants: are there any challenges to implementation (e.g., timelines, costs)?

Response

We feel this question is best assessed and answered by technical expert groups. But we recognise the importance of standardising error codes to enable TPPs to understand the reasons for failures in order to communicate clearly with customers and build user confidence in OB services. Our members have suggested that error messages around payment authorisation (PSU authentication and creation of the payment order within ASPSP domain), and payment failure reason codes should be a priority to standardise.

QUESTION 2.6
Enhancing transparency for end users emerged as a priority from Sprint 1. Which of the following options do you prefer to ensure that end users are clear on who they are paying or sharing data with:
    a) Keep existing software statement model - no change needed
    b) Enhance existing software statement model to reduce barriers, for example by ensuring correct completion
    c) Move to identification of parties in consent flow
In your answer, please provide implementation considerations, including timescales and potential costs, and any required regulatory intervention.

Response

EMA members would prefer option c) Move to identification of parties in the consent flow.

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

As raised by the TPP community during the development of OB standards for VRP and via the OBIE's change management process, the use of software statements to identify which business a customer has consented to access their account data or initiate a repeating payment, is cumbersome and not scalable in the long term.

The initial decision to adopt this technical approach was made, again when access to account data was the primary use-case being considered. This approach was regarded as fit for purpose because consumers established a limited number of connections for data access. However, as the same approach is used to provide the merchant's name to the ASPSP for VRP transactions so that the customer can see who they have paid in transaction histories available through their banking channels; the issue of scalability of the approach has to be reviewed. TPPs may be establishing relationships with thousands of merchants and the process for creating and managing software statements for each merchant will not be practical or cost-effective.

This underlines the point that the OB standards cannot stand still, they need constant review and update as new use cases or functionalities are adopted by the ecosystem. OBIE and then the future entity should manage this change cycle. However, we recognise that a move to identifying parties in the consent flow is a longer-term ecosystem development.

Section 3 - What are the longer-term[2] changes ?

QUESTION 3.1
How would the implementation of delegated authentication improve consumer outcomes? What structure would need to be in place to support the delivery of this, if this were to be prioritised? What does it mean in terms of liability arrangement? What are the use cases that will benefit from delegated authentication and what are the barriers and costs to implementation? Please consider international examples that could be a good reference point.

<u>Response</u>

There has not been sufficient time to consider the full impact of introducing delegated SCA. However, we do believe that the future OB roadmap should contain an objective of optimising the SCA journey for end users, and this could include enabling delegated SCA for some use cases (such as retail payments).

QUESTION 3.2
Multilateral agreements – Different options were proposed by members, in particular in relation to the degree of regulatory intervention needed to enable multilateral agreements and commercial solutions to take off. If regulatory intervention is advocated, should an approach such as the one adopted in Australia be considered where regulation provides high level principles for multilateral agreements to be followed? What are the pros and cons of your proposed model?

<u>Response</u>

The EMA considers there is scope for a multilateral framework to drive forward OB payments and overcome some of the barriers that PSPs are facing in developing compelling propositions for consumers and merchants; in particular to support the rollout of commercial VRPs. Operating under a model where ASPSPs and TPPs have to negotiate bilaterally for access commercial APIs and services is unsustainable in the long term, and ultimately will fragment the market to the point where consumers and business lose confidence in OB services.

---

[2] "Long-term" is defined as 18+ months

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

In order for OB payments to develop it has to be commercially viable for both account providers and TPPs. In the absence of a multilateral framework, the market can already be seen to be fragmenting with account providers exploring commercial opportunities for OB payments, but at the same time seeking to protect other revenue streams. As a result, the vibrant TPP community created by the CMA Order and PSD2 faces spiraling costs and barriers to growth.

We believe that regulatory intervention may be needed to break the inertia and move forwards. As a starting point, the market requires a clear set of strategic objectives and desired outcomes from JROC on OB payments to act as a focus for collective action. Thereafter, it can be clarified if multilateral frameworks are necessary, but we consider this will only be successfully achieved if multi-lateral frameworks are market-led and based on sound commercial basis.

An approach where the regulators provide high-level principles for multilateral agreements (as adopted in Australia) may be appropriate, but we note that adoption in Australia has been slow and limited. JROC needs to be clear which elements of the future OB strategy require multilateral agreements and where regulatory intervention could be most effective so that innovation is not compromised.

QUESTION 3.3

We have received feedback from Sprint 1 and directly that a single AIS/PIS authentication could improve customer experience. Do you agree and what are the key considerations, including costs and challenges to implementation?

Response

Yes, we believe that a single authentication for AIS/PIS access would improve customer experience. As discussed under Q3.1 – we believe that the future OB roadmap should contain an objective of optimising the SCA journey for end users.

QUESTION 3.4

What changes would need to take place to enable multiple authentications for SMEs, and what use cases would this support?

Response

We understand the OB standards already allow for multiple-signatory payment authorisations. Any market implementation issues with the existing OB standards should be considered as part of the change management cycle adopted by the future entity.

Section 4 - Which actor(s), including the Future Entity, should play a role in operationalising the items outlined (in Sections 1-3)?

QUESTION 4.1

What is the role of the future entity in supporting ongoing evidence collection (outlined in section 1) and the delivery of any of the changes highlighted under the short term and long term categories (sections 2 & 3)?

Response

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

As discussed in our response to Sprint 1 (Q11), we favour a centralised model whereby the future entity is market-led and provides services to the ecosystem which protects the operation of the existing live OB market, and at the same time is responsible for ensuring the constant evolution of the ecosystem; whether that is delivering core infrastructure services needed across the ecosystem (immediate requirement), maintaining and updating the standards and guidelines (short term priorities), or driving the implementation of the strategic roadmap (longer term).

Adopting this approach would mean that the future entity is naturally in a position to gather data from across the live ecosystem on the performance of the ecosystem, whether in terms of API performance, adherence to standards and guidelines, growth of the ecosystem, underlying issues etc. The future entity may also commission primary research where the ecosystem has identified a need for such research to support the development of the standards/guidelines, or inform decision making.

QUESTION 4.2
Where will regulatory and legislative changes be required in supporting the delivery of the proposed solutions? In what other ways can JROC facilitate progress, e.g., roundtable, industry sprints?

Response

We have confined our response to considering OB Payments.

As discussed below, and in our Sprint 1 response, clarifying the scope of VRP for Sweeping and driving forward commercial VRPs is a priority for EMA members. However, in order for OB payments to develop, the model adopted has to be commercially viable for both account providers and TPPs; a compliance-driven approach is not sustainable, and the future direction should not be solely compelled through regulatory intervention.

We believe that JROC has to develop a coherent overarching policy framework and clear expectations for the future of OB payments within the wider UK payments strategy, and specifically for account to account payments under the NPA. JROC should then act as broker with stakeholders to ensure the development of solutions for commercial and sweeping VRPs.

QUESTION 4.3

What in your view are the top 3 short-term priorities and top 3 longer-term priorities to be addressed in a roadmap for the future development of open banking+?

Response

The outcomes of the SWG process highlights that the market need clear direction from JROC on the objectives and expected outcomes for OB in the short and medium term in order to break the impasse and coalesce to find solutions which will achieve JROC's key priorities for Open Banking of creating a sustainable ecosystem, and unlocking the potential of OB payments and further data sharing propositions.

We strongly believe that JROC's objectives and expected outcomes for OB+ and the future entity are needed before a Roadmap of functionality can be finalised. That said, our members do have suggested priorities for the OB+ Roadmap which we detail below.

Short term priorities

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

As discussed in our response to Sprint 1, the EMA believes that in the short term the OB+ Roadmap should keep up the momentum and be focused on driving forward a robust, fit for purpose ecosystem.

General
Limit optionality in standards to drive consistent, frictionless consumer experience of all Open Banking services. This could include simplifying SCA journeys, mandating population and consumption of TRI data, improving consistent data element use, standardizing error codes, and improving payment status messages to PISPs.

In addition, the roadmap for open banking should address:

Payments:
1. **Facilitating a risk-based approach to payment limits** for OB payments and seek solutions for supporting high-value payments,
2. **Clarifying the scope of VRP for Sweeping**; in particular addressing the inconsistent treatment of e-money accounts as destination accounts for a sweeping transaction. This has particularly impacted our members, as Sweeping clarifications and guidance leave room for interpretation regarding e-money accounts and as a result has limited the number of use cases that TPPs have been able to develop for Sweeping
3. **Drive adoption of commercial VRPs**:
   – Determine the approach for multilateral framework,
   – Replace software statements as the means to register each merchant and identify customer facing entity in consent dashboard
   – Improve consent dashboard usability for payments

Data
4. Extend UK RTS on SCA Art 10 exemption to enable AISPs continuous unattended access to a broader account data set than balance and transaction history.

Longer term the roadmap should:

1. **Clarify the role of OB payments within wider UK payments policy and initiatives; set out the expected direction of travel under a coherent framework**:
   – Support Confirmation of Payee (CoP) in PIS journeys,
   – Review the impact of the APP scams reimbursement on PIS propositions, and support where necessary in OB standards. Such as improved fraud related data-exchange.
   – For some use cases, OB payments should be instant – assess impact of NPA and FPS product roadmap; align OB standards accordingly,
   – Assess the various digital identity initiatives being progressed in the UK, and identify any opportunities to leverage in the future Open Banking developments.

2. **Improve payer/payee experience:**
   – Explore the provision of payment guarantee functionality,
   – Improve customer authentication experience; standardise flows where possible (see also POS standards below),
   – Improve payment consent dashboards, and bank statement presentation of OB payments,
   – Pre-authorisation – reservation of funds and possibility to return to payer in case of fraud,
   – Standardised refunds for retail OB payments,
   – Standardise payment status and functional error codes to support end-user's experience,
   – API data-sharing to support fraud and transaction risk management,
   – Ensure consistent implementation of standing order and bulk payments APIs by ASPSPs,

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

– Develop POS standards – QR code and NFC standards for exchanging OB payment credentials,
– Electronic receipt standards.

3. **Support low-value OB payments:**
   – Enable low-value payments without SCA
   – Develop Faster Payment pricing to support low value payments to support a viable economic model.
   –
4. **Open up access to new data sets:**
   – Identify the data sets which Open finance should prioritise;
   – Develop appropriate API standards and guidelines;
   – Align with wider open data strategy

QUESTION 4.4
Should the future entity assume the role of a central standard setting body to develop, maintain and monitor future open banking standards or do more/less? If not the future entity, whom? How is competition best ensured?

Response

Yes, we believe the future entity should assume the role of central standard setting body for open banking.

The centralised model whereby OBIE has provided services to the ecosystem has been implemented in the UK with substantial investment by all participants over a prolonged period of time and has far exceeded original costs envisaged by regulators. The EMA considers that this investment should be leveraged to build the future operating model for the future entity responsible for open banking. Moreover, the centrally provided services relied upon by the live OB ecosystem should be protected, as change may introduce barriers to ASPSPs and TPPs looking to operate solely within the boundaries of the CMA Order or PSD2.

Therefore, a number of the services which go beyond standard setting should be provided centrally by a future entity, such as:
   – Onboarding of ecosystem participants, including conformance testing
   – Managing the security profile (trust framework) supporting the API standards
   – Directory Service
   – Fraud data-sharing hub
   – Facilitate dispute management
   – Service/help desk for ecosystem participants

Ultimately, the benefits of Open Banking will only be achieved if the ecosystem begins to benefit from network effects – more participants, more products and services, more end-users which will drive value to all participants. Hence one of the strategic objectives of the future entity must be to increase adoption and participation in the ecosystem

Competition will be best ensured if the funding and governance model of the future entity can be designed from the outset to give all stakeholders fair and proportionate participation and influence. As discussed in our response to Q4.5 below, the governance and funding model for the future entity is likely to require a tiered model to achieve this, including a layer of participants who may only wish to apply PSD2/CMA Order standards.

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

QUESTION 4.5

How should a central standards body be funded, for example tiered membership, regulatory levy, annual fees or a pay-for-use model? Should fees be based on market size, API numbers, customer base or other metrics?

Response

The EMA advocates for a whole of market funding model for the future entity from the outset, in which TPPs can participate **on a voluntary basis** as well as ASPSPs, for the development and implementation of standards for the Open Banking roadmap (beyond PSD2/CMA order related features).

We acknowledge that initially the number of funding TPPs may be low. However, if the future entity's governance and funding structure is not designed and set-up with an equal participation model it will be complex, and require further investment, to re-engineer in the future.

The funding approach should also be fair and proportionate, and is likely to require a tiered model whereby fees are determined by the type of participation (and the services accessed beyond standards use). This funding model has the potential to reduce the annual funding requirements for ASPSP participants and mitigate against the future risk of individual ASPSPs withdrawing support for the entity.

We realise that this approach may require a mandate on the larger banks to provide further funding for core services for a period which is long enough for the ecosystem to develop a long-term strategic plan (i.e probably longer than 3 years). Otherwise, there is always going to be an inherent risk that some players pull out and jeopordise the core services relied on by the current ecosystem. Moreover, the future entity cannot be operated on a model designed purely to recover the CMA9's costs of establishing the initial OB infrastructure, but must provide a level playing field so that commercial benefits of the current and future infrastructure can be derived for all participants.

As the UK further defines and implements its economy wide 'open' data strategy it is likely that the future entity will become part of a wider open-data governance structure. We therefore note that, longer term, the funding of the future entity may not be so reliant on the larger banks, as participants from across the economy may opt to participate.

We also acknowledge that centralised services beyond standard setting should be cost effective and current OBIE services may need to be reduced according to the economic model designed for the future entity. In designing the service capability of the future entity, we anticipate that a full cost-benefit analysis would be conducted to confirm the services which should be provided centrally.

We are aware that some market participants advocate a funding model in which all PSPs would fund the future entity via an FCA levy (or similar mechanism). Thus ensuring funding according to market size, and support expansion to future open finance initiatives.

The EMA considers that ultimately this model may frustrate the market's ability and freedom to innovate in the wider open finance context because:
- The Future Entity would remain compliance driven and may lack the commercial incentives for all participants to move beyond mandated functionality,
- May limit the services that the Future Entity can provide to the market (as cost base may be fixed)
- The funding mechanism could limit the members of the Future Entity to regulated entities which may, in the long term Open Finance context, not be appropriate.

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

- May act as a barrier to smaller PSPs entering the regulated market when they have no intention of participating in the Open Banking/Finance ecosystem.

For these reasons, any industry-wide levy approach to funding the future entity would need to be carefully assessed in light of the FCA's Open Finance strategy and policy.

QUESTION 4.6
We received several responses regarding the way in which trust services (currently the OBIE Directory, including provision of certificates and NCA/FCA permissions checking). Which model of delivery do you prefer:
    i)   a single centralised model
    ii)   ii) a federated model, whereby certificates can be provided by approved actors, or
    iii)   iii) another option (please explain).
 Please explain your reasoning e.g., evidence from other jurisdictions.

Response

We suggest that the future entity considers whether the trust services model is appropriate for the future OB+ roadmap within the context of JROC's strategy for OB. We recognise that some services that OBIE currently provide may not be commercially viable for the future entity to continue providing, but the most appropriate model for trust services cannot be determined without understanding the strategic context in which trust services will be provided.

For instance, should JROC decide that the core OB infrastructure layer should be open to market competition, then clearly this is a fundamental shift away from the OBIE centralised model of services and a federated model for trust services would have to be developed. But we suggest that JROC cannot make the decision on such a foundational change without fully assessing the impact (cost and benefits) to the ecosystem of doing so. The future entity should be structured and empowered to undertake this type of assessment in detail.

QUESTION 4.7
To deliver the vision of open banking+, what other functions should a future entity carry out (if any), apart from concerning standards setting and trust services? (e.g., development of multilateral frameworks, monitoring, participant support, ecosystem development and promotion). How should these be funded?

Response

As explained in our response to Sprint 1, we believe a number of the services currently provided by OBIE, beyond standard setting and supporting the trust framework, should continue to be provided centrally by a future entity, including:
- Onboarding of ecosystem participants, including conformance testing
- Fraud data-sharing
- Facilitating dispute management and resolution
- Service/help desk for ecosystem participants

We also noted that the future entity should be should be responsible for coordinating the market-led assessment of the most suitable multilateral framework which could be applied to OB Payments in the future. This would include identifying the most suitable governance structure for ongoing administration and management of any multilateral framework.

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL

ADDITIONAL COMMENTARY:
Please add additional commentary if there are topics which respondents feel would warrant consideration by the Committee. Please provide rationale and evidence.

<u>**Response**</u>

APPENDIX – SUPPORTING EVIDENCE DATA STRATEGY SPRINT 2

Where you wish to provide supporting evidence, please embed these or provide the links to them below. Please do not email them as attachments.

SWG - Strategic Working Group
Questions for SWG Ecosystem Strategy Sprint 2 (set by the Committee)
Email:swgsecretariat@openbanking.org.uk
CONFIDENTIAL