Berlin Group
openFinance

THE *Berlin* GROUP
A EUROPEAN STANDARDS INITIATIVE

Market Consultation
openFinance API Framework
Implementation Guidelines AIS for Securities

COMMENTS SHEET V1.00

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Document:			
Berlin Group openFinance - Implementation Guidelines AIS for Securities V0.9 CONSULTATION DRAFT 2022-07-01.pdf			
Comment (N° / ID)	Comment/question (when applicable with justification/rationale or reference section/page n°)	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
G	Regarding the Securities Transaction endpoint - Currently there is only an attribute of "amountIncludesFees" which indicates whether "transactionAmount" includes fees. We think that there should be a new attribute of "Fees". This attribute should indicate the fees of the transaction separately from the "transactionAmount".	This separation of the Fees from the transaction amount will enable a comparison between the fees rate of different ASPSPs. Therefore, TPPs will be able to offer comparison solutions and the end user will be able to reduce their costs.	BG: Agreed. Fees will be integrated as an optional attribute on transaction level. In addition, the standard will also allow to communicate securities related fee rules under account details.