

Market Consultation
openFinance API Framework
Implementation Guidelines Extended Payment Initiation Services

COMMENTS SHEET V1.00

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Document:			
Berlin Group openFinance - Implementation Guidelines Extended Payment Initiation Services V0.9 CONSULTATION DRAFT 2022-01-19.pdf			
Question (N° / ID)	Comment/question	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
1/G	In section 4.2, it is specified that Banking related errors in payment processing (like not sufficient liquidity) is in future transported via the transaction status reason code, not via additional error information. This refers to the introduction of new fields Status Reason and Status Reason Proprietary. We understand from what we have read in the IGs, this could impact the next versions of XS2A IGs. If this release is planned, we think this should take into account the major impact that this could have on PSD2 Compliance interfaces already implemented by TPPs, requiring to build a new error classification model. In conclusion, we are in the view that the application date of such a change should be accurately evaluated with the major ASPSPs.		Internal consultation be part of work on V2 of openFinance APIs; only minor impact on implementation identified. Standardisation on European Level seems to be helpful.
2/G	Regarding multiple deferred payments and secured multiple deferred payments, it seems implied by the IGs that in those cases multiple initiationIds can be linked to a single paymentIds	We suggest to better clarify this aspect in the IGs. Furthermore, we think that it could be useful to add an object in the "Get Payment Request" method that could return all the initiationIds referred to the paymentId, that were created up to date. This is suggested taking into account the complexity of creating this reconciliation internally for TPPs, that in some use cases don't use databases for tracing specific technical information about payment orders.	The access method GET /.../{paymentId}/initiations command be offered? will be added to the IGs.
3/T	It is not clear if the types "Status Reason Code" and "Securing Method Code" objects are coded as free strings or otherwise as restricted string in the openAPI signature.	We suggest to specify if "Status Reason Code" and "Securing Method Code" objects are coded as free or restricted strings. In the latter case, we suggest to clarify if it would be possible to eventually add new methods in the future, to include other possibilities for securing payments.	Securing Method Code is a proprietary code list which can be extended later. A remark could be added to use ISO codes for status reason codes with priority. It is difficult to exclude proprietary codes fully.

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Question (N° / ID)	Comment/question	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
4/E	In section 5.3, we think that the paymentId field is missing as path parameter for the "Execution Initiation for Deferred Payments" method. This is further supported by the table shown in section 4.3 and the "Execution Initiation for Deferred Payments" example in section 5.3: both elements feature the paymentId as path parameter.	The complete path should be corrected as follows: POST /v2/{extended-payment-services}/{payment-product}/{paymentId}/initiations.	Erratum
5/E	In section 5.5, we think that the paymentId field is missing as path parameter for the "Execution Initiation for Recurring Payments" method. This is further supported by the table shown in section 4.3 and the "Execution Initiation for Recurring Payments" example in section 5.5: both elements feature the paymentId as path parameter. In this case, we point out that the example URL contains a paymentId string that is not followed by the string "/initiations", as required by endpoints definition in section 4.3	Thus, the complete path in section 5.5 should be corrected as follows: POST /v2/{extended-payment-services}/{payment-product}/{paymentId}/initiations. The URL shown as example below in the same section should be corrected adding the string "/initiations"	Erratum
6/E	In section 5.4, "Recurring Payments Initiation Request" not allows "micro-sepa-credit-transfers" as value of "payment product".	In this specific case (5.5 Execution Initiation for Recurring Payments) we think that "micro-sepa-credit-transfers" like value of "payment product" should not be supported by the standard.	Erratum