

**Market Consultation
openFinance API Framework
Implementation Guidelines Request to Pay Services**

COMMENTS SHEET V1.00

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Document:

Berlin Group openFinance - Implementation Guidelines Request to Pay Services V0.9 CONSULTATION DRAFT 2021-06-14.pdf

Comment (N° / ID)	Comment/question (when applicable with justification/rationale or reference section/page n°)	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
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<p>1</p>	<p>In many SMEs or corporates the process for initiation of payments (SCT / SDD) is as follows:</p> <ul style="list-style-type: none"> • Initiation side: <ul style="list-style-type: none"> ○ The initiations are gathered over a previously defined time (e.g. one day). ○ The initiations are transferred to the bank (without authorization) – in many cases technically operated by an service provider (e.g. SRZs in Germany). ○ The initiation is authorized by an person in management at dank site. • Receiver side: <ul style="list-style-type: none"> ○ There are typically two checks (due diligence): first a check whether the good delivered is okay (in quality and in amount), and second if the price / conditions fit to the conditions agreed within the contract. <p>SMEs / corporates will design the process with RTP in a similar way as it fits best to their existing processes. Many aspects are already covered in the document. However, there are aspects which are required from our market perspective, but not yet described in the document:</p> <ul style="list-style-type: none"> • A transfer of a RTP (without an SCA). If a SCA is necessary for initiation, it should be provided subsequently – probably by a different person of the SME / corporate. • A “bulk” of RTPs. We understand that the specification will “start small” and “bulk RTPs” will follow afterwards (compare chapter 4.1. 	<p>See comment / question</p>	<p>Contractual definitions should provide a sufficient solution between technical submitter, e.g. by using a dedicated eIDAS certificate. No SCA by the Originator is assumed.</p> <p>A /bulk-requests-for-payments endpoint will be added, following the terminology already in place for SCT and SDD.</p>
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	<p>“SCA for bulk payments or even multi-bulk-payments will follow”). However, if only single RTPs are possible, usability for SME / corporates will be very limited.</p> <ul style="list-style-type: none"> For approval of the RTP a 4-eye-principle is required. 		
1 – T	It can be useful to enrich the field “requestStatus” with other values such as “payment accepted but not executed for technical reason” (page 9)	For this scenario, it can be useful to use a specific value and / or add another use case to re-execute the payment (such as “retry” of the request to pay)	The payment status will tell about this.
2 – E	In line with previous paragraph, to avoid misunderstanding, there’s the need to specify in the cancellation request the possibility of “5xx” error type (page 11)	Specify in the text, the presence of “5xx” family error for cancellation request (in addition to “4xx” family error)	Clarified that all http codes of the core XS2A specification might be used.
3 – T	In the request of “Request to Pay Request” API (page 13) it is not specified the payment data request, that are reported instead in the example (page 18)	Insert in the request body, all the payment data necessary to the use case (for example, amount, IBAN)	This is specified in the generic payment data model document, which was part of the market consultation. Extend the related remark if needed.
4 – T	In request of “Request to Pay Request”, but not only for this specific API, it can be useful to add the field that allow TPP to insert an image of the company (page 15)	Insert in the APIs, the field related to image / logo with following characteristics: - optional - type: base64-encoding	This field is foreseen in the generic payment data model v2, which will be the basis for all extended payment services.
5 – T	For “Get Transaction Status Request” API, it can be useful add to the PSU more details and information about transaction (page 22)	In the response body of “Get Transaction Status Request” API, can be useful add two following fields: - PSUnote - exchange rate, in case of the account operativity is different by Euro	An optional psuMessage has been added.