

Market Consultation
openFinance API Framework
Operational Rules Administrative Services

COMMENTS SHEET V1.00

Distribution: Publicly available

Document:			
Berlin Group openFinance - Operational Rules Administrative Services V09 CONSULTATION DRAFT 2021-06-07.pdf			
Comment (N° / ID)	Comment/question (when applicable with justification/rationale or reference section/page n°)	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
1/E	Page 7, Figure 2: Scenario "services organised by a scheme" – the ASPSP owned (local) Directory Service name is misleading as this could be operated by a Directory Service Provider and could be the same as the Scheme owned (global) Directory Service.	Make it clear that a Directory Service Provider could provide the ASPSP owned (local) Directory Service and that this could be the same as the Scheme owned (global) Directory Service.	Wording in the document will be changed in such a way that schemes or ASPSPs might use an external directory service.
2/E	Page 8, Figure 3: Scenario "services organised by ASPSP – client is new partner" – the name 'ASPSP owned (local) Directory Service' is misleading as this capability could be provided by an external Directory Service Provider providing directory services to the ASPSP.	Make it clear that the directory services do not have to be 'owned' by the ASPSP or 'local' to the ASPSP. These services could be provided by an external Directory Service Provider.	Wording in the document will be changed in such a way that schemes or ASPSPs might use an external directory service.
3/E	Page 9, Figure 4: Scenario "services organised by ASPSP – client is a known partner" - the name 'ASPSP owned (local) Directory Service' is misleading as this capability could be provided by an external Directory Service Provider providing directory services to the ASPSP.	Make it clear that the directory services do not have to be 'owned' by the ASPSP or 'local' to the ASPSP. These services could be provided by an external Directory Service Provider.	Wording in the document will be changed in such a way that schemes or ASPSPs might use an external directory service.
4/G	Section 2.2, Page 10 - 'If a client has not been registered as a TPP by a NCA, the QWAC and QSealC of this client may defer from some of the requirements of [TS 119 495]. It would be useful if the Berlin Group could support the concept of an 'Authorisation Number' as in TS 119 495 that would be unique to the API Client. Attached is a suggest mechanism for extending the Authorisation Number format specified by TS 119 495 to allow non-PSD scheme identifiers and for non-NCA authorisation bodies to be identified and to issue API Client identification numbers.	Work with ETSI to extend the global nature of TS 119 495 to accommodate other regulatory environments than PSD2, other scheme identifiers and other authorisation bodies and issuers of API Client identification numbers. (See attached Global Authorisation Number Formatting proposal).	The idea of the standard is to open the interface to be more flexible. If API access schemes see a need to introduce such an identifier, it is up to the API access scheme to define it.
5/G	Section 5.1, Page 24 – 'API Client Identification - The API Client has to inform the ASPSP/Scheme about the QTSP, who issued his qualified certificates.' - A central directory and identity checking service would remove the need for an API Client to have to notify the ASPSP/Scheme the identity of the QTSP, who issued their eIDAS certificate.	A central directory system can use the Trusted Lists to identify all QTSPs and store their trust anchors. This would simplify the operational processes for API Clients and ASPSP/Schemes. eIDAS uses the concept of trusted lists to enable the entire ecosystem to trust eIDAS certificates without the need for a pre-registration step.	This is an implementation decision of a related API access scheme. It will not be addressed by the interface standard.

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1 - T	In the section "2.4 Services for information about prices and technical onboarding of an API Client" and in the rest of the document, it is specified that the API Client cannot use the administrative services without first having signed a general agreement with the scheme owner or with one or more ASPSPs for the right to access a set of extended services. This means that the API services are "closed" and can only be used with a general agreement	Some administrative services offered via APIs by scheme owners or ASPSPs - such as price lists for a service - could be " public" and not conveyed through the signing of a prior general agreement. If this is the case, for example, an API client might first inquire about the price of a service of different ASPSP before signing a general agreement with one of these and beginning technical onboarding	Admin Services should still be open only for API Client having gone through contract phase (e.g. a scheme participation). The price list will not be open to the public. Schemes or ASPSPs might decide to offer public price information e.g. via Discovery APIs in future. A dedicated remark will be added that ASPSP might offer the price list in the admin service to regulated entities without any pre-phase of signing bilateral contracts.
2 - T	On page 20, section "4.3 API Service: Update Service Contract Details": it is reported that API client can update some (administrative) parameters, including "Name, e-mail-address and telephone number for the contact person of the API client." It would seem possible, then, to enter references only for a single contact person	It might be useful to provide for multiple contact persons (e.g. technical and business profiles) associated with an API Client. Therefore, the following change is proposed: "Full name, e-mail address and telephone number of API client contact persons"	Document will be editorially reworked to recognize this comment.
3 - E	On page 28, section 6.3.2 API Client data, the LEI (Legal Entity Identifier) is mentioned, but this term does not appear in section 7.1 Glossary on page 34.	It may be useful to include the term LEI (Legal Entity Identifier) in section 7.1 Glossary on page 34	LEI will be taken into the glossary.