

Market Consultation  
openFinance API Framework  
Operational Rules Extended Payment Initiation Services

COMMENTS and RESULTS SHEET V1.00

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Document:			
Berlin Group openFinance - Operational Rules Extended Payment Initiation Services V0.91 CONSULTATION DRAFT 2021-03-08.pdf			
Question (N° / ID)	Dedicated consultation questions (ref. sections 4.2 and 4.6)	Response	Agreed Resolution (Berlin Group)
Q1	Section 4.2: Is it useful to retrieve the validity period of the authorised deferred payment from the API, if this timeframe is longer than the pre-agreed execution period?		
		In our opinion, is useful to retrieve the validity period of the authorised deferred payment from the API:  1. to more easily, in the event of a dispute, demonstrate the correct behaviour of the ASPSP  2. for return to the customer / stakeholders a specific error	
		Yes, it is interesting to have this information as it is a hint that a payment initiation might still be possible and attempted if needed.  Otherwise, blindly, we would not attempt any payment initiation after the pre-agreed execution period, when needed, as we could not just assume that there are chances that the validity period is still not already over.	It was agreed to add a related attribute as an optional element. API Access Schemes or bilateral contract then might mandate this field.
	<i>Section 4.6: ASPSPs see the recurring push service XRFPIIS more relevant than the pulling XRPIIS service. Please note further that legal items need to be clarified yet regarding mandate issues around XRPIIS.</i>		
Q2	Is the service XRPIIS interesting from the market demand side in addition to XRFPIIS? If so, why?		

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		<p>The service XRPIIS is interesting because at the moment, in the market, only credit transfers are managed via API.</p> <p>In this sense, the XRPIIS service will be obsolete only when all services (including SDDs) are available via API.</p> <p>In addition, we consider that payments via credit transfers are suitable for recurring payments (e.g. rent) but nevertheless may not be extensible to solutions currently based on SDD (e.g. multimedia subscriptions)</p>	
		We are not 100% sure about the usecases that could be covered (compare comment E1), making it difficult to answer this question.	It was agreed to add related use cases as examples.
		<p>Clearly XRFPIIS is the most interesting service as it offers the “all-in-one” operation. But still, XRFPIIS might be interesting for some customers and use cases where SDD has to be used.</p> <p>For example, there could be the case of a company with an existing complex process based on SDD that can't be changed or replaced. In that case, XRPIIS might be an easy addon to help having more success with their SDD payments. Also, in such a case, this could be the first step to a smoother transition to XRFPIIS at a later time.</p>	The decision on the potential support of this service is postponed to a later version of this service. A deeper market feedback from end users is needed.
Q3	If it is interesting: Debit payment transactions often offer rejections by debtor bank e.g. due to funds not available and rejections by PSU due to not willing anymore to pay. Does this service make sense, if the service is only blocking rejections of the underlying debit transaction by the debtor bank but later rejections by the PSU are still possible?		

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		<p>At the moment, it is only possible to cancel a reservation; a modification of an authorization is actually not imagined.</p> <p>For this reason, making rejections by the PSU possible is useful in case of cancel a subscription to create a new one, slightly different from the precedent in some detail (i.e. for modification)</p>	
		<p>It can still be interesting for multiple reasons:</p> <p>Even if a rejection case is still possible, it will lower the total rejection rate.</p> <p>The consent given by a PSU through the XRPIIS service could give a clue/proof that he was informed about the coming debit payment transaction in the case of a later contestation about the "unattended/unexpected" aspect of a SDD operation.</p>	<p>No direct impact. SDD processing towards PSU stays unchanged.</p>

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1 / T	For recurring payments with reservation of funds might be useful define a period while the TPP would proceed the initiation of payments and relative reservation (page 15)	The period can be defined in the subscription agreement or be standard for API service (e.g. 1 week before agreed execution date)	Define a relative starting point for initiations during a period.
2 / G	Consider the impact of exchange rates for cross-currency transactions, because the insertion of a maximum amount if the payment is deferred in time, may not be enough to guarantee the correct execution (page 27)	Should be useful introduce a technical rule to calculate also the maximum amount with exchange rate or limit this type of service to transactions without exchange rates	No impact since the maximum amount reserved is already in payment currency for now. This needs to be clarified in the rules.
3 / E	Typo in the initials, reported XPIIS (page 8)	New initials: XRPIIS	Agreed
E1	Section 4: In many cases, processes which even seem to be identical on first sight are different in practical application (e.g. due to different duration of the reservation). To avoid confusion, it would be useful to give example usecases for the services.	Describe shortly one or two scenarios of practical application for the services, e.g. <ul style="list-style-type: none"> <li>4.1 (reservation): A practical example for this service is reservation of money in an online shop and a subsequent capture of the money if the package is shipped.</li> <li>4.4 (recurring payment): A practical example is payment of (monthly) telephone costs.</li> </ul>	Exemplary use cases in addition to the API Service description will be added in future.
G1	Delivery of documents related to the payment, e.g. related receipts, invoices or contractual documents would be an very interesting additional usecase on both sides: <ul style="list-style-type: none"> <li>For merchants to provide them to the bank (could be part of the api for extended Payment Initiation)</li> <li>For TPPs to retrieve them (could be part of the API for extended account information)</li> </ul>	Specification of an endpoint offering these types of documents would be useful.	It was agreed that it should be dealt with in the same way as for RTP.  openFinance will deal with document related services in a next step (dedicated services and services integrated in payments).

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E4	Based on the way that Service Type acronyms are created, I don't understand why "Extended Recurring Reservation of Funds" is named: "XRPIIS" as it is missing the "F" otherwise associated with "Reservation of Funds" and still has the "P" that corresponds to "Payment"	This service's acronym should probably be "XRFPIIS"	The naming is following the core PIIS service of the PSD2 interface, where funds are checked (here reserved).
E5	At the beginning of section 4, there is the list of Service Type with their acronyms. I think that there is a typo: here, "XPIIS" is supposed to be "XRPIIS"	If we ignore the comment E4, in this list it should be "XRPIIS"	See comment above.
T6	Section 7.3.2: If an "instructed amount" was set to zero, with the "Closing Flag" enabled, because we want to close the payment, then what to do with additional fields that could be filled and provided (ie Remittance info, EndToEndId, Requested Execution Date) ? Will they simply all be ignored? Or otherwise, if a "Requested Execution Date" is set at a later time, and still ["instructed amount = 0", "closing flag" = True], will the payment be closed immediately or at the requested execution date?	All other fields should be ignored, including "requested execution date" and the payment will be closed immediately.	Will be detailed on Implementation Guideline level.
T7	Section 6.5: As these are new services, it would be more valuable to be consistent all over the specification and ease implementations by only supporting JSON encoding and not XML data encoding anymore.	Don't allow any XML data encoding anymore. Only JSON.	JSON is mandated for all ASPSP. But XML could make sense in specific situations (e.g. bilateral contracts.) So, the standardisation needs still to support XML.
T8	Section 4.1 and later: In case of a failure or a rejection of the payment initiation, itself, will the payment be closed and the reservation fund removed without ability to retry later? In the same way, for multiple payment initiations, will a failure decrease the remaining number of allowed initiations if it was set?	A failure/rejection at payment initiation should behave as if no initiation was done regarding reservation and limits.	Will be detailed in Implementation Guideline level.

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T9	Section 7.3.3: The maximum number of remaining initiation still possible should be added to Payment Initiation Response if there is one.	The maximum number of remaining initiation still possible should be added to Payment Initiation Response if there is one.	Agreed. To be detailed in Implementation Guidelines.
G10	There is a global issue with the PIS service that is affecting even more the Extended Payment Initiation Services but that is still unaddressed:  The debtor IBAN is almost always mandatory in a PIS initiation request, and I think that it is here also the case when initiating any of the transactions. I think that this is needed for the different messages to know which PSU is referred to.  But, it is a problem, especially in such a payment context, because it is not very friendly to have to ask a PSU about its IBAN, especially just before having him connect to his bank with his credentials (for the SCA).	Debtor info should not be mandatory to be provided by TPP but only optional if already known.  As in the STET specification, the selection of the account to use for the debtor and its associated IBAN should be filled directly by the ASPSP during the authorization/sca step where the ASPSP can more ergonomically ask the PSU about which account to use if there is more than one.  Additionally, if a "pre-oath2" step is done with a "PIS" or "Extended Payment" scope, an endpoint within this scope should be provided to the TPP to retrieve the list of accounts (with their id / iban / titles) that could be used as "debtor account" for payment requests.	The convenience factor is agreed. There are several solutions for this, e.g. Pre-OAuth with IBAN selection, optional use in redirect SCA case or account list to choose the account. The Implementation Guidelines will cover this.