

Market Consultation  
openFinance API Framework  
Operational Rules Push Account Information Services

COMMENTS and RESULTS SHEET V1.00

Distribution: Publicly available

| <b>Document:</b>  |   |   |  |
|---|---|---|--|
| <b>Berlin Group openFinance - Operational Rules Push Account Information Services V0.91 CONSULTATION DRAFT 2021-02-17.pdf</b> |   |   |  |
| Comment (N° / ID)   | Comment/question (when applicable with justification/rationale or reference section/page n°)  | Suggested Resolution (alternative)  | Agreed Resolution (Berlin Group)   |
| G1  | Section 4:<br>Currently, only push of account entries is specified. However, SMEs / corporates need the account statements for bookkeeping. So, pushing the account statements (e.g. in form of a camt.053) would be an interesting usecase which is needed by many SMEs / corporates.  | Specify pushing account statements" (e.g. in form of a camt.053).   | Agreed for phase 2 of this service. Details like formats to be discussed later.  |
| G2  | Section 4:<br>As far as I understand, the TPP establishing the push mechanism to receive account entries does not necessarily have an AIS licence. Is this true? If yes: are there any restrictions about the data he can receive (e.g. he cannot receive data of other legal entities or may not receive account entries belonging to regulated accounts). | Add 1 or 2 sentences giving an answer to this question.   | This is a matter of compliance/implementation and cannot be covered by the standard.   |
| T1  | Section 4.1:<br>Is there a global maximum duration of subscription? Can ASPSPs define an (individual) maximum duration?   | Add 1 or 2 sentences giving an answer to this question.<br>If ASPSPs can define an (individual) maximum duration an end endpoint is needed, which returns this information. | The actual validity will be part of the server response.<br>The maximum duration will be published via the Discovery API, which is in the standardisation in parallel. |
| E1  | Section 4:<br>The specific requests and the data fields in this request are not described yet. (Probably they will be specified in the final document.)   | Specify the specific requests and the data fields.  | Implementation Guidelines will cover this in a next step.  |
| 1 / G   | Evaluate the addition of the scenario (and related API service) in which TPP cancels subscription in case of PSU not fulfilling its duties (page 21)  | Introduce an additional API service and its use case  | Cancellation by TPPs is already supported.   |

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| 2 / T             | The coding of business data (page 22) is up to the stakeholder (camt.05x, JSON, MT94x)  | Introduce a defined standard for the coding of business data (page 22), in line with what has been done for "Extended payment initiation services" (page 21)         | It was agreed that JSON is the minimum standard for account entries reports, others can be offered in addition. Preference is then steered by API client |
| 3 / T             | The operational rules do not contain specific requirements on data modelling on protocol level (page 25)  | In order to standardize the market and create common guidelines for all stakeholders, it might be better to specify requirements on data modelling on protocol level | Implementation Guidelines will cover this.   |
| 4 / T             | Offer the possibility of filtering by beneficiary, in order to distinguish payments made to a specific person, for example linked to a recurring subscription (page 27) | Provide "Beneficiary" field among the exchanged data, allowing the use of appropriate filters  | Implementation Guidelines will cover this  |