

**Market Consultation
openFinance API Framework
Operational Rules Request to Pay Services**

COMMENTS SHEET V1.00

Distribution: Publicly available

Document:

Berlin Group openFinance - Operational Rules Request to Pay Services V09 CONSULTATION DRAFT 2021-05-27.pdf

Comment (N° / ID)	Comment/question (when applicable with justification/rationale or reference section/page n°)	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
1/G	Section 2.1 : BG brings up the notion of sub-item on page 10 which does not seem to be foreseen in the others; the functionality is of interest if all the actors accept it		Add a remark, that this functionality is foreseen for the future.
2/G	Section 2.3 : BG clearly indicates the separation between RTP and Payment (like the EPC) but in page 27 is listed a large number of status linked to the payment; this has an interest but it would be necessary to know if it is mandatory or not within the framework ?		Add a remark, that nevertheless, the Receiver-RTPSP will inform the API Client about the payment status where possible. No mandate to show all payment statuses like e.g. execution status.
3/G	Section 2.3 : the scope is very Receiver-RTPSP oriented with only APIs exposed on its side; why not expose an API for the response on the Originator-RTPSP or Aggregator side?		The API structure for the client is partially defined in the Resource Status Notification Service, i.e. the resource definition on the API client side. This is a very generic service to be re-used here. This service allows the API Client to define the exact API endpoint as such for their own needs. A full standardisation is not needed.

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4/G	Section 2.3 : it is indicated "data model based on pain.013" for the RTP message but no indication for the RTP Status; why not pain.014 based? Also in the GIs, there is a doubt even about pain.013: "is there a need from the ASPSP / the TPP side also to support pain.013 / pain.014 data sets within this API? If so, what are the reasons behind this need. ". The basic question is: does BG choose or not to use the ISO20022 standard?		Cp above and cp. the definitions of the generic Resource Status Notification Service, which transports all dynamic status data needed within a pain.014 structure. A related remark will be added to the document.
5/G	Section 2.4 : it can be confusing to indicate that the RTP message (previously indicated as pain.013 based) can also be a cancellation message (note that EPC and EBA use a dedicated ISO20022 message)		Clarification of the figure 4 will be provided. In a RESTful API a dedicated cancellation message based on ISO20022 is not efficient.
6/G	Section 5.1.3 : the proposals for recovering the response to a request for status RTP for the Originator-RTPSP or Agregator do not seem satisfactory (source of many calls or with 2 different techniques); why not offer an API on the Originator-RTPSP side?		See above, No 4. The same remark applies.
7/G	We do not see any time constraints and rejection messages or APIs linked to processing out of time.		Technical details will only be provided in the related Implementation Guidelines. Rejection information will be transported either by HTTP codes in case of processing errors or status information in case of RTP content errors.