

NISP-NL

Proposed work stream approach

Amsterdam
21 December 2018

Recap: BVN proposes Dutch collaboration under NISP-NL

Situation

- Members of BVN largely base their APIs on “NextGenPSD2” specification of the Berlin Group
- BVN has taken on liaison role in NextGenPSD2 Implementation Support Project (NISP) to assist its members with implementation of PSD2 compliant (NextGenPSD2) APIs
- The support to BVN members will be organised in the National Implementation Support Project (NISP-NL)

Aim of NISP-NL

- Facilitate smooth implementation of PSD2 API in the Netherlands
- Enable ASPSPs to get an exemption of the fallback obligation

Approach

- Multi-stakeholder platform discussing the topics that allow for collaboration

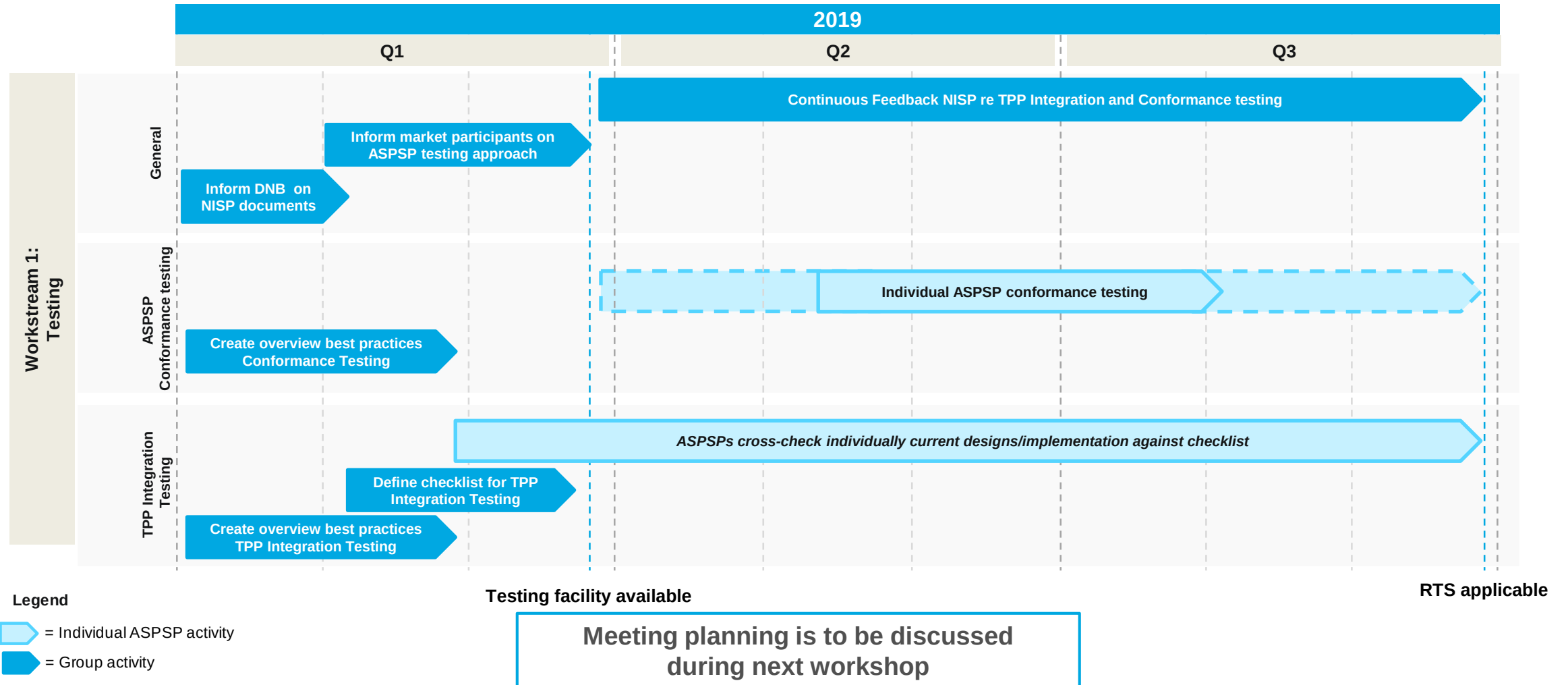
Timeline & milestones

- 14 December 2018: kick-off NISP-NL collaboration
- 16 January 2019: planning NISP NL collaboration
- 14 March 2019: start ‘testing period’
- 14 June 2019: latest date to start ‘wide usage’ period
- 14 September 2019: RTS on SCA & CSC apply

Collaboration is proposed on two topics: ‘testing’ and ‘NCA evidence gathering’

Topic	Description	Goal
1 Testing	- NISP offers ‘conformance testing’ tool for ASPSP APIs, incl. test concept, test cases and requirements for test tools - NISP ‘conformance testing’ is not specifically designed for Dutch context - NISP specifies best practices for ASPSP’s testing facility for TPPs, however, ASPSPs decide individually on following these best practices	- Avoid duplication of ASPSPs effort by: - Jointly assessing NISP Conformance Testing implications for Dutch banks - Providing best practices and checklist for TPP Integration Testing
2 NCA evidence gathering	ASPSPs need to report to the NCA on wide array of topics, e.g.: - Service levels on availability and performance - Summary of results of stress test - Elaboration of methods of carrying out authentication procedures - Evidence that dedicated interface meets legal requirements - Summary of the results of market testing - Description of the usage of the dedicated interface - Evidence ASPSP has made all reasonable efforts to ensure wide usage - Information on resolution of problems	- Smoothen the exemption process by: - Defining templates and processes for ASPSP reporting obligations towards DNB - Coordinating implementation of both ASPSPs and TPPs

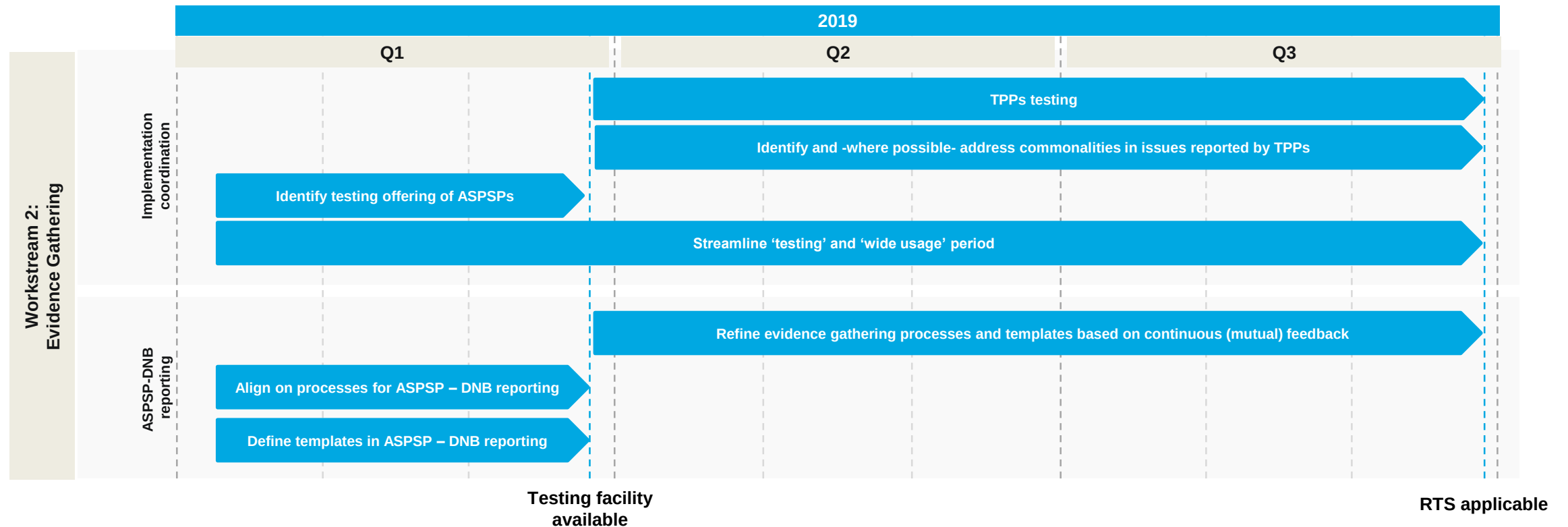
Testing workstream focuses on interpreting NISP ASPSP Conformance Testing and TPP Integration testing documentation and providing best practices for Dutch ASPSPs



Overview (sub-)workstream activities and deliverables for ensuring successful testing by Dutch ASPSPs

	TESTING – GENERAL	TESTING – CONFORMANCE TESTING	TESTING – TPP INTEGRATION TESTING
GOAL	Ensure alignment with relevant stakeholders for overall testing workstream	Support ASPSPs to interpret conformance testing requirements, as input for requesting exemption to fall back obligation	Provide ASPSPs with best practices and checklist for compliant testing facility
ACTIVITIES	• Inform DNB on NISP documents and to what extent these apply to the Dutch ASPSP context: ensure correct scoping, interpretation and understanding of NISP documents • Inform - where applicable - in a consistent manner market participants (TPPs) on the testing approach of Dutch ASPSPs, align mutual expectations and ensure testing coverage • Provide continuous feedback to NISP regarding TPP Integration and Conformance testing: ensure continuous improvement of NISP deliverables and as a result of that improve quality of Dutch ASPSP's NextGenPSD2 implementation	• Create overview best practices Conformance Testing: avoid duplication of ASPSPs effort by jointly interpreting NISP conformance testing docs and determining applicability to Dutch context • Note: ASPSPs perform conformance test individually, as this can not be a function of this collaboration	• Create overview best practices TPP Integration Testing: avoid duplication of ASPSPs effort by jointly creating overview of best practices for integration testing • Define checklist for TPP Integration testing: determine what functionality and features are essential to include in testing facility to enable seamless and consistent experience for TPPs (cf. RTS/GLs) • Note: ASPSPs cross-check individually current designs/implementation against checklist, as this can not be a function of this collaboration
DELIVERABLES	1. Alignment DNB and market participants 2. NL applicability of NISP deliverables	3. Best practices ASPSP Conformance Testing	4. Best practices TPP Integration Testing 5. Checklist TPP Integration Testing
PARTICIPANTS	• ASPSPs • TPPs • DNB	• ASPSPs • DNB (passive)	• ASPSPs • TPPs • DNB (passive)

Evidence Gathering workstream aims at easing exemption process for both ASPSPs and NCA by defining templates and processes



Legend

➡ = Group activity

Meeting planning is to be discussed during next workshop

Overview (sub-)workstream activities and deliverables for ensuring successful evidence reporting by Dutch ASPSPs

	ASPSP-DNB REPORTING	IMPLEMENTATION COORDINATION
GOAL	Define templates and processes for ASPSP reporting obligations* towards DNB	Ensure national coordination on implementation by ASPSPs
ACTIVITIES	• <i>Define templates for ASPSP – DNB reporting</i>: develop common view on e.g. type of information, breath/ depth of information, document format/structure • <i>Align on processes for ASPSP – DNB reporting</i>: agree on e.g. point of contact, timelines, touchpoints, response lead-times, hand-in deadlines • <i>Refine evidence gathering templates and processes based on continuous (mutual) feedback</i>: periodically review current templates and processes in order to optimise both	• <i>Streamline ‘testing’ period</i>: inform TPPs on individual ASPSP implementation timelines to enable TPPs to optimally prepare for and utilise testing period, with wide coverage of ASPSPs dedicated interfaces • <i>Identify testing offering of ASPSPs</i>: engage in discussion on what ASPSPs will offer under PSD2 XS2A and how TPPs expect to test ASPSP’s interface • <i>TPP testing</i>: actual testing of ASPSPs dedicated interfaces by TPPs • <i>Identify commonalities in issues reported by TPPs</i>: identify and – where possible – jointly address issues that TPPs report as a result of testing or production use of ASPSP’s dedicated interfaces
DELIVERABLES	1. Common templates ASPSP-DNB reporting 2. Common processes ASPSP-DNB reporting	3. Overview of TPP and ASPSP testing needs 4. Testing of dedicated interfaces among Dutch ASPSPs by TPPs
PARTICIPANTS	• ASPSPs • DNB	• ASPSPs • TPPs • DNB (passive)

*Note: reporting pertains to all ASPSP reporting obligations following from PSD2, RTS on SCA & CSC and the fallback exemption guidelines