

Topic: Implementation Coordination workstream

Datum: 12-2-2019

Participants:

- **Members of Betaalvereniging Nederland (BVN)**
- **Representative of Verenigde Betaal Instellingen Nederland**
- **TPP's (to be licensed / DNB procedure)**
- **Representatives of Dutch Central Bank (DNB)**

Agenda:

10:00 Welcome & introduction (Max Geerling, BVN)

10:15 Detailing workstream 'implementation coordination' (Max Geerling, BVN)

10:30 Discussion regarding NISP-NL 'implementation coordination' topics

12:15 Next steps & closing (Max Geerling, BVN)

Introduction

- As a recap, the planning of NISP-NL for February and the goal of the 'implementation coordination' workstream was discussed. The topic of this workstream meeting is aimed at TPP – ASPSP interaction.
- It is noted that considerably more TPPs than previously are present in this meeting.
- The relevant aspects of GL 6, 7 and 8 of the fallback exemption Guideline were discussed, indicating that they implicitly invite AS-PSPs and TPPs to enter into dialogue regarding the implementation of PSD2 APIs
- In this elaboration, DNB clarified a number of topics
 - Requirements from 6.1.b. (pertains to *testing*) and 7.1.b. (pertains to *production* usage) can only be partially addressed by participating in the NISP-NL forum, as AS-PSPs can use all possible channels at their disposal to reach market parties
 - The 3 months wide usage period starts at June 14 the latest, given the fact that it has to be at least 3 months and completed before September 14
 - The situation where a TPP services are based on a contract with a bank i.s.o. only based on a licence (no contract) is also possible after 14-9-2019. DNB will provide more guidance on, among others, this topic during their 27-2-2019 meeting
 - No concrete measure for 'wide usage' exists, as it depends on the number of TPPs in the market, how much effort AS-PSPs have undertaken to reach these TPPs, what services TPPs will actually use and how AS-PSPs have supported TPPs in resolving their issues

Central dedicated interface repository

- The repository aims to facilitate efficient planning for TPPs in implementing AS-PSP PSD2 APIs

- It was consented that the BVN will create a simple central dedicated-interface repository. In this repository, market participants can, at one central location, find relevant information regarding the NL AS-PSPs' dedicated interfaces. This repository will contain the following information per AS-PSP:
 - Name
 - BIC
 - Country
 - URL developer portal
 - URL technical specifications per service
 - Indicative date of go-live per service (this was consented to be useful, even if the dates are indicative and non-binding)
- BVN will create excel and chase AS-PSPs for input

Addressing, identifying and resolving common issues

- It was consented to set up a (initially) fortnightly conference call where AS-PSPs and TPPs can discuss common issues during the period until 14 Sept 2019 (testing and 'wide usage').
- Common issues are issues that do not pertain to a bilateral AS-PSP – TPP relation solely, but are issues that TPPs encounter with multiple/all AS-PSPs and that cannot be solved in the bilateral relation with an AS-PSP. Bilateral issues that a TPP encounters at an individual AS-PSP only are not in scope
- AS-PSPs and TPPs will send issues to the BVN at the latest 2 working days prior to the call, to allow for an efficient conference call where the only the commonality of issues is being discussed.
- The outcome of NISP-NL discussions can form relevant input for AS-PSPs in their reporting towards the NCA in their fallback exemption procedure, but, as DNB indicated, does not suffice in itself
- Next to issues, suggestions for change as proposed by TPPs are welcome too, in so far that they address common issues in the context of the exemption guidelines.
- The outcome of the NISP-NL issue call could also be relevant input to the EBA API working group, as well as NextGenPSD2.

NISP-NL connectivity day

- The idea was proposed to organise 2 meetings where AS-PSPs and TPPs would meet, where TPPs can connect to AS-PSPs and AS-PSPs can answer TPPs' questions regarding testing and production implementation of dedicated interface on TPP side
- After some discussion, the idea arose to organise 1 day. This day would take place late March, early April. During this day, TPPs can connect to AS-PSPs testing environments with the help of AS-PSP developers, ensuring short lead times for connecting of TPPs and the opportunity for AS-PSPs to learn from issues TPPs encounter, both during the connectivity day as well as in the period afterwards
- It was acknowledged that the levels of maturity of TPPs differ. Some are further in their understanding and preparation of PSD2 services than others. In the road leading

towards the connectivity day, information will be distributed by the BVN in order to raise awareness among relatively new TPPs on the topic of PSD2, especially on the opportunities of early testing. This way, the value for both TPPs and AS-PSPs is maximised, as they both maximise the learning potential during the 'testing period'

- The group expressed the concern that possibly no new TPPs would be reached with the information to be provided during the day (other than the ones currently present in the NISP-NL platform), and therefore BVN will send out a questionnaire to TPPs to verify the usefulness of (a) NISP-NL connectivity day(s) with the TPPs