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Questions Received on the Mobile Proxy Forum's (MPF) Request for Proposal (RFP) to Provide a Standardised Proxy Lookup (SPL) service and Answers

N°	RFP Section	Questions	Market Implementation Working Group (MIWG) Response
1.	Generic	Are there any restrictions / requirement of the services being located in the European Union?	<p>It would be recommended for the SPL Service provider(s) to be located in the European Economic Area, to ensure the alignment of the applicable legal framework with that of the users of the services (with whom individual contracts will need to be signed). For example, specific rules on outsourcing may apply to the end-users. Also, this would generate comfort towards the European Union institutions (ECB, European Commission).</p> <p>From a data protection point of view, it is worth pointing out that transferring personal data outside the EEA to a third country that does not have adequate levels of data protection is prohibited.</p>
2.	Generic	Are there any restrictions / requirement to share platform with other similar services, provided of course service level is respected?	The SPL service can run on a 'shared' platform as long as service level, including data protection/confidentiality and security is respected.
3.	Generic	The SPL only provides an IBAN for the credit transfer. For SEPA Credit Transfer besides the beneficiary IBAN also the beneficiary name is mandatory. Should the SPL answer provide not only the IBAN but also the beneficiary name?	The IBAN is the minimum requirement, which should be accompanied by the name of the account holder in those jurisdictions in which there are no legal restrictions that prevent the SPL from getting it. In case more information such as the IBAN account holder's name is available it should be provided.
4.	Generic	We would need to understand whether there are specific technical constraints for registering and configuring IRP and RRP on SPL; indeed, in our opinion, the document SCP2P 018-16 Version 1.1 does not provide enough technical details (interface specification). Alternatively, can the hypothesis of the registration interface freely be defined by the tenderer?	It is up to the SPL provider to define registration and configuration details for the on-boarding process.
5.	Generic	What are requirements for system software (e.g. DB, OS) used for solution? E.g., can open source products be used? Are there any requirements for manufacturer support?	There are no specific requirements. It is up to the solution provider / operator to provide a solution that meets the service requirements. If that can be done using open source software then that is a valid option.

6.	Generic	<p>What procedure will be followed in a scenario whereby the 'winning' provider would fail to deliver the SPL service in accordance with the terms defined in the RFP. Would the provider with the 'second best' evaluation be nominated as the new provider? Or, would a new RFP process be initiated?</p>	<p>This topic cannot be answered yet. This will need to be discussed with the MPF.</p>
7.	2.1 Timeline	<p>Are the Q&A sessions planned to be joint sessions or individual sessions with each candidate? Will MPF arrange the sessions or is it candidate's responsibility? In case MPF requests candidates to arrange the session, by when will they confirm the participant details and time for the session? Can our associates in Belgium attend in person this clarification call? Can you provide the venue details? Will the responses to the queries be sent by mail to the nominated point of contact or will it be published as a general response in the website of MPF?</p>	<p>The Q&A sessions are organised as bilateral sessions between one candidate and the MIWG. The sessions will be held via Skype. The MPF will contact the candidates to arrange these sessions.</p> <p>The answers to the questions submitted by candidates will be published on the EPC website without revealing the identity of the candidates.</p> <p>Additional questions asked during the Q&A sessions will also be published (anonymously) on the EPC website but only if these questions do not contain any sensitive information.</p>
8.	2.1 Timeline p.5 (Point 4)	<p>"Q&A sessions (60 minutes) between the candidates and the Market Implementation WG of the MPF." Will this be just one call for all potential bidders or a separate 60 mins call for each potential bidder who intends to submit a proposal?</p>	<p>Separate calls will be organised (also see response to Q7).</p>
9.	2.3 Terms & Conditions of Response p.8	<p>"The MPF will enter into a formal agreement with the selected submitter(s) on terms and conditions to be finalised once the successful submitter(s) have been selected." What is intended to be covered by terms and conditions? Is pricing to have been covered in our response? Will more than 1 submitter may be chosen? Can you advise how this would this work in practice? If we are one of the winning submitters, would we be expected to formally work with another SPL provider who submitted a proposal?</p>	<p>The terms and conditions will cover the SLA, change management etc, which have not yet been finalised. We would like to see a price indication and a price model (to be finalised with the final agreement).</p> <p>Whether or not multiple providers would be chosen will depend on the submissions received. If this would be the case, the MPF would need to investigate interoperability opportunities.</p>
10.	2.3 Terms & Conditions of Response Awarding Authority p.8	<p>When will the short list of selected submitters be issued by the MPF?</p>	<p>The MPF is expected to inform the candidates of the outcome of the RFP on March 23rd, 2018.</p>
11.	3.2.3 Reservations p.9	<p>What reservations and conditions do you have in mind? Please give some more information.</p>	<p>Any contractual reservations, representations and warranties submitters deem necessary for inclusion in a future contract related to the provision of the services.</p>

12.	3.3 Background and introduction and 5.6 Billing	<p>Can you provide additional details on the 'Billing' feature for the SPL Service?</p> <p>Does MPF expect the service provider to actually carry out the billing operations or only provide the module capturing relevant details to enable billing?</p> <p>Does the term billing refer to (as an example) the full cost-recovery and the not-for-profit basis on which the existing Target Instant Payment Settlement -TIPS is based upon?</p> <p>What will be the frequency of billing?</p>	<p>The service provider will carry out the billing operations and be responsible for the contractual relationship between the mobile P2P services that connect to the SPL service.</p> <p>Billing frequency and principles of the billing (e.g. fees, cost recovery etc.) is at the service provider's discretion.</p>
13.	3.3 Background and introduction	<p>Message Flowchart - Can you please let us know the expectation here please? Are we expected to explain how the SPL platform would work using various scenarios?</p>	<p>Please describe the bricks of the platform and the data flows between them from the entrance of the IRP API request to the outgoing API request to the RRP and vice versa with the answer from the RRP, i.e. within the "scope of SPL rules" in the global diagram under 4.2.</p>
14.	3.3 Background and introduction	<p>What is the MPF view on using a public cloud for the SPL Service?</p>	<p>No specific views, as long as the specification requirements are met and compliance is ensured with all relevant rules and regulations (notably GDPR).</p>
15.	3.3 Background and introduction	<p>What part of the SPL can be termed as 'Minimum Viable Product'?</p>	<p>The SPL must be operational and able to process requests and replies 24/7/365.</p>
16.	3.3 Background and introduction	<p>Is there a view on the anticipated volumes from member countries?</p>	<p>Please refer to section 5.1 of the RFP.</p>
17.	3.4 Project delivery	<p>Are you open for onshore/offshore/near shore model for development and Operational support?</p>	<p>As indicated with Q1, the applicable legal framework for the delivery of the services should be compatible with that of the (EU-based) users of the services (with whom individual contracts will need to be signed).</p>
18.	3.4 Project delivery	<p>Is there any preference for hosting the solution in a specific country in the European Union?</p>	<p>No preference. (please also see the response to Q1)</p>
19.	3.4 Project Delivery	<p>Please provide the specifications / requirements around the administration module? What are the inputs required for registering an IRP/RRP?</p>	<p>Please refer to the response to question 4.</p>
20.	3.4 Project delivery	<p>Is there any other testing that is expected other than the ones mentioned below?</p> <p>Functional Testing:</p> <ul style="list-style-type: none"> > System Testing > System Integration Testing > Regression Testing > QA Automation > API testing > Service Virtualisation <p>Non- Functional Testing:</p> <ul style="list-style-type: none"> > Performance Testing > Security Testing > Statistics Analytics Testing 	<p>It is up to the candidate / service provider to evaluate if more testing is needed for providing a service that meets the requirements of this RFP.</p>

21.	3.4 Project delivery	Is Business Testing in scope for the Service Provider?	We are not completely sure what is meant by 'Business Testing' but the service provider is responsible for delivering a service that complies with the specifications in this RFP and may need to conduct tests with the connecting mobile P2P services.
22.	3.4 Project delivery	Who will conduct the industry testing of the subscribers and certify them?	The service provider / candidate.
23.	3.4 Project delivery	We assume, Supplier is responsible for providing and maintaining Infrastructure for testing like creating and maintaining environments for System Testing, System Integration Testing, Non-Functional Testing and Test Data Management. Kindly confirm	Confirmed.
24.	3.4 Project delivery	We understand that testing is planned during mid-August 2018. Kindly let us know the following details: > Are there any testing artefacts that can be leveraged for this programme? > Any Test Automation framework that can be leveraged	Any testing systems and artefacts etc. is to be provided by the candidate / service provider.
25.	3.9 Guide for submission of proposal...	Should the 'Presentation of the solution/RFP' be delivered on Feb 9, or can this be delivered later? When is the presentation scheduled?	The presentation / proposal is to be submitted on Feb 9 th (by 18 CET) and it should be self-explanatory meaning that we do not foresee a presentation session between the candidates and the MIWG.
26.	3.9 Guide for submission of proposal...	Since all the response documents are requested to be sent electronically, please advise if there are number of pages / file size restrictions for PDF/docx responses and number of slides allowed in pptx presentation.	There are no restrictions.
27.	4.2 Overview of SPL capability requirement	Please elaborate the roles and responsibilities of the SPL Scheme Manager and who would be performing this role?	The MPF (or future entity of MPF) would act as the SPL's rulebook owner.
28.	4.2 Overview of SPL capability requirement	Please confirm that the SPL platform provider's technical, regulatory and legal obligations are restricted to the workflow between the IRP-SPL and the SPL-RRP interfaces as well as the necessary supporting services (invoice, billing, dispute handling) -as shown in the Workflow Picture as Scope of SPL rules. Consequently, <u>do not cover</u> the remaining space (e.g. between payer's PSP and IRPs, and RRP's and payee's PSP).	Confirmed.
29.	4.2 Overview of SPL capability requirement	Polling Hierarchies - In the polling process indicated in Step 3, what will be the level of variation in the polling hierarchies?	We fail to understand what "Level of variation" refers to.

		What are the additional data elements which may be required in addition to the preference and registration?	All data elements are listed in Clauses 8.2 and 8.3. If you feel that additional data elements are needed, please let us know.
30.	4.2 Overview of SPL capability requirement	Polling Hierarchies - The variables defined for polling hierarchies (preference and registration) - what would be the type of preferences and is this end consumer defined?	Preference is an optional feature for directories wanting to include them as a way to register the beneficiary's preferences when wishing to receive funds on a specific account.
31.	4.2 Overview of SPL capability requirement	Polling hierarchy – would processing based on retained details of the mobile number and successful RRP be allowable to increase efficiency of processing subsequent transactions? If so is it reasonable to apply a time limit to this data retention?	No, the SPL is not expected to store any kind of data such as pre-existing relationships between a mobile phone number and an IBAN account for re-using them on further searches. Storage of data is just for audit purposes.
32.	4.2 Overview of SPL capability requirement	Apart from IRPs, RRPs and Service Providers, what other entities need to have access to the system and for what purpose?	There is as such no need that another entity has access to the system.
33.	4.2 Overview of SPL capability requirement	Overview of SPL capability requirement: you mention "The SPL's sole purpose is to provide sufficient information so that a payment can be initiated by the payer's PSP." Please could you share what information, other than IBAN, is required to be carried over as part of response to an IRP?	In those countries where there are no legal obstacles to provide it, the IBAN should be accompanied by the Beneficiary's name, which is a requirement to execute a SEPA payment order.
34.	Section 4.2 Appendix E	Are there any constraints or considerations against open source software adoption for SPL solution?	No, as long as service level including data protection/confidentiality and security is respected.
35.	4.2 Overview of SPL capability requirement and 5.4	Can you confirm that conformance to the described API standards is mandatory (wording of RFP implies optional) or would another mechanism be allowable to achieve the specified (equivalent) functionality?	In case a candidate has other mechanisms than the suggested APIs that can achieve the requirements of the RFP, those mechanisms may be suggested and treated equally as proposals with the APIs.
36.	5.1 NF-R1 Volumes	Regarding number of connected IRPs/RRPs: Can you project how these 10 – 50 participants (within 5 years) will onboard over the years.	There currently exist more than 50 mobile P2P service providers in Europe and it could be envisaged that other P2P providers such as ASPSPs would want to offer the service via other channels such as their online banking interface. The MPF will advocate the use of the service but the connection between a P2P service provider and the SPL service is solely between the SPL service provider and the P2P service provider thus we cannot provide a more accurate estimate at the moment.
37.	5.2 NF-R2 Availability and Performance	Availability and Performance - Our understanding is that the SPL will need to be integrated to the Target Instant Payment Settlement Service - TIPS platform (for proxy resolution), therefore the SPL platform will need to deliver a similar available and performance metrics.	There is no technical or formal link between TIPS and the SPL. The SPL will in its core functionality deliver information such as an IBAN so a payment can be initiated. This payment could be a SEPA Instant Credit Transfer sent and settled via TIPS but it is at the discretion of the ASPSP which

		26 In order to match/align the metrics, request you to provide the TIPS deployment architecture for us to match the deployment model Can you also provide the infrastructure details on which TIPS is hosted?	payment infrastructure they want to use.
38.	5.2 NF-R2 Availability and Performance p.15	“An operational and technical helpdesk must be available during regular business hours”. Given the breadth of the EU in terms of time zones, would this be from 0900 in Cyprus to 1800 in Ireland Monday to Friday?	Between 9-17 CET should be sufficient.
39.	5.2 NF-R2 Availability and Performance p.15	Is the helpdesk required to provide support in more than one European Language? Is English allowed to be the default language?	English is sufficient.
40.	5.2 NF-R2 Availability p.15	Is the system required to be localized into more than one European Language?	English is sufficient.
41.	5.2 NF-R2 Availability and Performance p.15	Based on our experience, service availability of 100% with 24/7 is not an achievable requirement. Technically the ECB recommends an availability of quarterly 99,88% like for internet facing payment services, see https://www.ecb.europa.eu/ecb/legal/pdf/en_con_2015_49_f_sign.pdf , should be sufficient. We propose to follow the same requirements	Agreed
42.	5.2 NF-R2 Availability and Performance p.15	We assume the maximum switching time of 50ms is meant for each message ③ and ⑤, i.e. in total 100ms. Is that correct?	Yes, that is correct.
43.	5.2 NF-R2 Availability and Performance	Please clarify how is 50 ms calculated? Is it a time limit for local SPL service processing only (do not contain RRP(s) response time)?	Yes, it is only for the SPL service. Each message ③ and ⑤ in the diagram should have a time limit of 50 ms.
44.	5.2 NF-R2 – Availability and Performance	“Contingency procedures must be available in case there are operational incidents outside regular business hours”. Could you please clarify on the abovementioned procedure as required by the EPC in the light of the “24/7 with target of 100% availability” which the EPC has to offer	Firstly, it should be noted that the EPC does not have a role in the operation of the SPL. The EPC only provides secretariat support to the MPF. The service provider of the SPL service should deliver a system targeting 100% availability or at least 98,88% each quarter in line with ECB document https://www.ecb.europa.eu/ecb/legal/pdf/en_con_2015_49_f_sign.pdf . The service provider should provide a technical helpdesk during daily business hours that can support connected service providers and resolve any operational issues. In case the SPL experiences operational issues outside regular business hours (9-17 CET on weekdays) then the SPL service provider must have in place procedures that can resolve the issues so that the SPL service can function 24/7 or at least 98,88% of the time.

			(also see response to Q41)
45.	5.2 NF-R2 – Availability and Performance	Could you please explain in more details requirement „maximum switching time per message: 50 ms“. Do we understand correctly, that that time only applicable to execution of polling hierarchy logic and does not include waiting and receiving response from RRP (as this time is out of control by SPL if e.g. RRP cannot accept or process request quickly enough).	That is correct. The 50ms requirement is only applicable for each message ③ and ⑤ in the diagram which are in control of the SPL service provider.
46.	5.2 NF-R2 Availability and Performance	Please provide more information on the timing requirements for the IRP-SPL and SPL-RRP interfaces, specifically on the meaning of "maximum switching time per message" (of 50 ms). One possible way to understand the "maximum switching time per message" is to assume that any request-response pair of messages needs to be completed after max. 50 ms, even if that means to send (or assume) a null answer. This could imply that in the worst case no request would ever be answered in a meaningful way (e.g. if RRP consistently answer too late to keep the initial message's time frame). If, however, those 50ms are only related to the IRP-SPL interface the timing conditions would be considerably stricter for the SPL-RRP interface (e.g. 25ms per request-response pair). Please comment on our assumptions!	<p>The 50 ms only applies to message ③ and ⑤ in the diagram meaning that once the SPL has received a mobile number from the IRP it has 50 ms to do the polling hierarchy and send the request (message ③) to the RRP. Once the SPL receives a response (#4) from the RRP it has 50 ms to forward the answer (IBAN and possible name etc.) to the IRP.</p> <p>The SPL cannot be accountable for performance of the IRP and RRP.</p>
47.	5.2 NF-R2 Availability and Performance	Please explain in these regards the term contingency procedures and how these interact with the switching time NF- Req. of 50ms.	In case of a service disruption where the SPL is either not working at all or performing 'slowly', procedures must be put in place to resolve the issues so that the SPL service can function properly again as quickly as possible (also in case the disruption happens outside of regular business hours).
48.	5.3 NF-R3 Data retention and data protection	Can you confirm the contents/data elements which it would be allowable to retain in logs since the system is not a database service?	At the level of the SPL provider, only the lookup request reference data (AT-05) and the time stamp request (AT-06) of the Request and the same AT-05 plus the receiver scheme ID (A-03) and the registration time stamp (AT-16). This would be enough for the IRP and RRP in terms of proof without retaining personal data.
49.	5.3 NF-R3 Data retention and data protection p.15	“Because the SPL solution is strictly a messaging platform and not a database or registry service, data retention of request and response logs and audit trails for supporting services (invoicing, billing, reporting, dispute handling etc.) should be securely stored for at least 3 months.”	This would depend on the applicable legal framework – different rules may apply depending on the type of data being processed

		How long would records be needed to be retained as a minimum / maximum?	
50.	5.4 NF-R3 Data retention and data protection and NF-R4 Security	As part of NF-R3 - Data retention and data protection and NF-R4 – Security we assume, MPF will provide documents w.r.t European data protection rules and regulations and compliance with all applicable national and European (EEA/EU) cross-border laws and regulations on payment systems (including data privacy) for compliance. Kindly confirm Is there any country specific regulation that would impact SPL service? If so, would MPF provide the relevant variations?	The MPF will not be able to provide these documents. It is for the candidate to identify and comply with the relevant regulations.
51.	5.4 NF-R4 Security	Apart from core SPL process (delivering APIs) what are the other value streams that are in – scope (for example product development, marketing, self-service etc.) for the SPL Operator?	The core service is to cater for P2P services thus converting a mobile number to IBAN. The MPF will have regard to future support for additional proxy types and account identifiers.
52.	5.4 NF-R4 – Security	Who provides the network and networking security? Firewalls, IDS, Routers for the SPL service?	The SPL service provider delivers everything.
53.	5.4 NF-R4 – Security	Is it correct to assume that all data in transit will be encrypted; all messages will be encrypted in the SPL. This will imply that internal users of the system will never be able to access the message content (mobile numbers and bank account number)	Encryption will take place between: <ol style="list-style-type: none">1. the IRP and the SPL, and2. the SPL and the RRP But the SPL has to decrypt encrypted messages received from both IRP and RRP to be able to route messages to the right destination. The SPL is to be protected so that unauthorized employees of the SPL operator, can't grant access to the data exchanged during the provision of the service.
54.	5.5 NF-R5 Statistics p.16	The sentence "When/if more proxies are introduced basic statistics for each proxy type b" seems to be incomplete. Please complete it.	Apologies, the 'b' at the end of the sentence should be deleted. In case more proxy types than the mobile number is introduced it should be possible to make statistics separately on each proxy type.
55.	5.5 NF-R5 Statistics	Please explain which formats are accepted as machine-readable format.	Commonly used formats like csv or xml for instance.
56.	5.6 Billing	Should billing and invoice processing support multi-currency calculations or euro currency only?	This is up to the service provider who will have the relationship with the connected services.
57.	5.6 Billing	Billing the participating P2P solutions. Is our understanding correct that this means to bill the IRPs and RRP?	Yes, it is the SPL service provider who has the relationship with the IRPs and RRP and who will carry out the billing.
58.	6.1 LC-R1 – Compliance with	Please share the regulatory document mentioned here and any Master Service Agreement (MSA)	An exhaustive list of applicable rules to be complied with cannot be provided, due to the dependence on the legal

	European regulations	document that the technical provider has to comply with.	framework applicable to the SPL service provider as an institution and the exact implementation of the SPL. At least the GDPR (Reg. 2016/679) and the EBA's RTS specifying the requirements on strong customer authentication, please refer also to appendix E Chapter 5. In summary, the SPL providers themselves are hence expected to identify the legal framework applicable to the services they offer.
59.	7 Financials	Is there a pricing template to capture the financial details for responses FI-R1, FI-R2 and FI-R3?	No, it is up to every submitter to propose its cost structure.
60.	7 Financials	Please clarify about the entity who would be paying the technical provider for the service it renders? Will that be the new entity that will be created? This includes payments to cover the expenses incurred during the development testing and implementation?	The technical service provider will be paid by the IRPs and RRP's that subscribe to the service. Expenses for development, testing, implementation and operation should be funded by the IRPs and RRP's via operational fees depending on the price model the service operator decides to support and eventually additional services the operator decides to implement. The new entity (based on the MPF) will not fund anything. The entity will only govern the rulebook.
61.	7.3 Additional Costs	Does MPF have office space where the technical provider can collocate his resources delivering SPL Objectives? This may be required for stakeholder interactions and Governance	No, the MPF cannot provide this.
62.	8 Evaluation Criteria p.17	What is the influence of the different criteria on the decision (e.g. pricing versus functionality)?	As stated in the RFP there are a number of criteria and the ones written in bold must be met.
63.	8 Evaluation Criteria p.17	Can more clarity be provided on criteria and weight of criteria to evaluate responses?	As stated in the RFP there are a number of criteria and the ones written in bold must be met.
64.	Appendix E 2 List of functionalities supported by the SPL Operator - point 10, p.29	"Facilitate any audit upon request by the Mobile Proxy Scheme entity." Please be more specific about nature and frequency of the audits requested by MPF.	Classical BPO audit items, depending also on the SPL Operator's organisation (see question 12 above), such as: <ul style="list-style-type: none"> - Process security - Data retention - Process audit trails Possible in situ audits, such as: <ul style="list-style-type: none"> - Premises safety - Machines used
65.	Appendix E 6.2.1 SPL Operator management responsibilities (ii Infrastructure components under the responsibility of the SPL Operator)	It is mentioned that a Utility Company will be formed to own the services. What will be the role of this entity for this service? Will Utility Company own all the assets: Software, Hardware, Licenses etc which make up the solution?	There is no mentioning of a utility company in those sections. The SPL operator will provide and own software, hardware etc. do the billing etc. and receive the full revenue. The MPF (or future entity of MPF) will own the rulebook of the SPL.

		<p>Will Utility Company procure the licenses /HW/SW as defined in the Bill of Material?</p> <p>Will Utility Company enter into contractual arrangements with OEMs?</p>	
66.	Appendix E 6.2.1 SPL Operator management responsibilities (I SPL Operator management responsibilities)	<p>Are you expecting the SPL Operator to take care of billing IRBs and RRBs?</p> <p>Or</p> <p>Will it be carried out by the Utility company?</p>	<p>The SPL operator must take care of billing the IRPs and RRP's and also maintain the relationship with these organisations.</p>
67.	Appendix E 6.2.1 SPL Operator management responsibilities (I SPL Operator management responsibilities)	<p>Is MPF open for offshore Helpdesk & Operations team setup to provide support 24*7 support?</p> <p>Is the helpdesk and IT helpdesk service or a business helpdesk or both are expected to be provided by the Service Provider</p> <p>What are the regular business hours of operation?</p> <p>Are there any specific language requirements for the helpdesk support?</p>	<p>Offshore is OK as long as there is no access to personal data and at least English is supported.</p> <p>The helpdesk (IT and business) must be available 9-17 CET on weekdays but for contingency purposes IT helpdesk must be reachable 24/7. (Also see response to Q1)</p>
68.	Appendix E 6.2.1 SPL Operator management responsibilities (I SPL Operator management responsibilities)	<p>Please respond whether you are expecting the technical provider to take care of business operations as well? This includes activities of on boarding IRBs, RRBS, Business queries, exceptions etc.</p>	<p>The technical provider must take care of business operations as well.</p>
69.	Appendix E 8.2 List of Data Elements for the SPL Request	<p>Does the message structure indicate the full structure of the message, or, is this a subset from the ISO20022 which TIPS uses?</p> <p>Is it right to state that the TIPS platform, for the purpose of resolving the proxy, will only send these data elements to SPL? Is this correct?</p>	<p>TIPS does not have anything to do with the SPL. The SPL service is not intended to run on the TIPS platform but on a platform provided by the SPL operator. The SPL service only seeks to help 'translating' a mobile number to an IBAN. Any payments that are initiated on the basis of a SPL query may be sent via the payment infrastructure that the mobile P2P service provider decides to use. This could be TIPS but also many other infrastructures.</p> <p>TWG agrees</p>
70.	Appendix E 8.2 List of Data Elements for the SPL Request	<p>It is assumed that the SPL will only respond back with the documented API structure to TIPS and not the full ISO20022 message? Request you to please validate this assumption.</p>	<p>There is no communication between the SPL and TIPS.</p>
71.	Appendix E 8.2 List of Data Elements for the SPL Request	<p>According to the List of Data Elements for the SPL Request (chapter 8) beneficiary name is optional. On the other hand, providing a mechanism for the payer to confirm the identity of the beneficiary of the payment prior to the generation of the payment order can be required, as described</p>	<p>Yes, it will be optional when the SPL is launched (part of the minimum viable product) but it is envisaged it to be supported shortly after.</p>

		in chapter 10. Should we still assume the beneficiary name / personal data will be optional in SPL on launch?	
72.	Appendix E 8.2 List of Data Elements for the SPL Request	There is stated that "Timestamp - Generated by the IRP only for the SPL or Generated by the IRP for both the SPL and the RRP". What is the point of IRP specifying different timestamp for RRP? Can timestamp differ from current time? If timestamp should be time of the request, what is allowed deviation from SPL system time?	There may be a time stamp given in the IRP-SPL request by the IRP and another time stamp given in the SPL-RRP request by the SPL or a unique time stamp given by the IRP in the IRP-SPL request and transmitted as is by the SPL to the RRP. Timestamp must bear the time zone it refers to (CET, or EET...)
73.	Appendix E 8.2 List of Data Elements for the SPL Request	Do we understand correctly, that Lookup request reference data be different for SPL and RRP for the sake of uniqueness? Or are there any other meaning by having possibility to have two separate request references?	No, the lookup request reference data (AT-05) is the same in all messages of a complete process, i.e. IRP->SPL + SPL-> RRP + RRP->SPL + SPL->IRP. The uniqueness of each step is ensured by the conjunction of the reference and the Originator/Receiver scheme ID.
74.	Appendix E 8.2 List of Data Elements for the SPL Request	In case of different lookup request reference for SPL and for IRP, should Lookup request reference data uniqueness for IRP be checked by SPL?	The SPL has to verify the unique identifier that has been assigned to the IRP during the onboarding process.
75.	Appendix E, 9.2 Polling hierarchy	What validations should be performed by SPL when receiving a message from IRP / RRP? For example, is IBAN structure or duplicated message ID a subject to verification? What should be the next steps if so (e.g. response with specified error code)?	For quality of service purposes, the SPL may validate the format of the messages received from either the IRP or the RRP. But this is not a requirement. In any case the validation of the SPL request shall be performed by the RRP and the validation of the SPL response shall be performed by the IRP.
76.	Appendix E, 9.2 Poling hierarchy	What validation of IRP requests and RRP response is expected? E.g.: Request format, presence of mandatory fields Proxy format correctness IBAN format correctness Timestamp deviation from system time Uniqueness of request/response reference	Format and/or data element encoding might be validated at the will of the SPL. But the SPL is not required to validate the received messages. (also, please refer to the response to Q75)
77.	Appendix E 10 SPL Architecture	In the section 10, MPF has requested response for 4 functional requirements. However, in section 4, MPF has only given 2 functional requirements. Please clarify.	Correct, there are only two functional requirements.
78.	Appendix E, 10.3 Security Requirements	With regard to security requirements enounced at paragraph 10.3: is it mandatory to use HSM and key management in an agreed manner between RRP / IRP and SPL?	Yes. Both the RRP and the SPL are responsible for the security of the customer sensitive data (e.g., IBAN payee). As part of the onboard process, security mechanisms to be used for key management should be contractually agreed. It's up to the SPL supplier to define details on the key management process.
79.	Appendix E 10.4. Security architecture implementation aspects	Where are the requirements for asynchronous communication and process in SPL?	Asynchronous mechanisms are only needed if AS4 is used. In case the SPL supplier decides to implement AS4, the supplier shall specify the requirements for the asynchronous communication.
80.	Appendix E	Is site-to-site VPN across SPL required in case of applying the	At present site-to-site VPN across SPL is not required.

		"Mobile P2P Interoperability Framework"? If not, do you allow two-way SSL connection with IP addresses whitelist for connecting to SPL service?	VPN could be an option (to be agreed between the SPL and the IRPs/RRPs) for an additional security layer on top of a communication secured using TLS.
81.	Appendix E Onboarding	Please can you confirm our assumption that, registry providers will integrate their services using the SPL API and that the SPL provider will not be responsible for bespoke integration with registry providers?	Yes, registry providers will integrate their services with the APIs offered by the SPL provider and the SPL provider is not responsible for bespoke integration with registry providers.
82.	Appendix E Onboarding	Can you confirm the SPL Provider will need to provide SPL – API conformance test services for example API sandbox and test suite	The SPL provider is responsible for delivering testing services that the SPL provider deems necessary for registry providers to connect successfully to and use the SPL service.
83.	Document SCP2P 018-16 Rules for operating SPL service § 3 Governance, page 2	"Participants will ensure that (contractual and implicit) privacy expectations of end users (both on the sending and receiving end of transactions) are met and are in conformance with the SPL's charter on privacy for end-users. "Where do we find "SPL's charter on privacy"?"	This topic is still under discussion.
84.	Document SCP2P 018-16 Rules for operating SPL service § 4.3 a) Rules for participating in the SPL service, page 3	"The lookup request function can be done by anyone who fulfils the SPL service membership requirements and is a registered participant in the service." Where do we find "SPL service membership requirements"?"	We refer to section 4.2 "Rules for joining the SPL service" in the same document. Participants/members of the SPL service must hold a European PSP license.