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**Summary of the 9th Meeting of the
API Evaluation Group
8 June 2018, 10h30-17h00 CET
Hotel Warwick, Rue Duquesnoy 5, 1000 Brussels
(Approved by the API EG Members)**

1. Welcome

The co-chair, J. Whittle (NPSO Ltd) welcomed the participants to the ninth meeting of the API Evaluation Group (EG) and conveyed the apologies of the other co-chair, O. Berglund (Trustly Group AB) who was exceptionally unable to attend this meeting.

Please see Annex I for the list of attendees.

2. Approval of the agenda (API EG 033-18)

The agenda was approved with a slight ordering change suggested by J. Whittle.

3. Regulatory updates

The EC did not provide any regulatory updates. EBA staff explained that they are anticipating publishing some clarification on the RTS by the end of June.

4. Preparation afternoon session with the API initiatives

The API initiatives had been invited to join the afternoon session of the 8 June 2018 API EG meeting in order to discuss their responses to the questionnaire on recommended API functionalities and to request further clarification if needed.

To streamline the discussion J. Whittle suggested to address the questions one by one and to primarily focus on the questions with the least commonalities. He highlighted that this should be a cooperative exercise and that the API EG should refrain from passing any judgement. Moreover, the API initiatives will be asked upfront if they feel comfortable with discussing their responses in the presence of the other initiatives.

The API EG needs to focus on the finalisation and publication by the end of June 2018 of a list of recommended API functionalities. This would however not include a scoring overview.

5. Progress report on 'hot topics' (API EG 020-18)

The following list of hot topics was reviewed in order to agree whether the listed items should indeed still be labelled as a hot topic and to agree on the current status:

Topic 1: Authentication (SCA)

The work is completed and published on the EPC website.

Topic 2: AIS data (what data is in scope)

This is still a hot topic and further work is required.

Topic 3: Access to payment account information by AISPs (4 times a day)

It was agreed that the remaining question is related to how this can be implemented in practice and therefore the API EG should ask the API initiatives what functionality they have foreseen to accommodate this.

It was reiterated that push messages are not required by law but can be agreed on a bilateral level.

Topic 4: Consent in scope of PSD2 in the context of the GDPR

It was already agreed at the 14 May 2018 API EG meeting that this was no longer a hot topic following the presentation provided by DG FISMA.

There is however still a discussion on the topic of sensitive data but this not a priority for the API EG right now.

Topic 5: Who applies strong customer authentication (SCA)?

The dedicated team working on this topic noted that they were still planning to finalise a document.

Topic 6: The “What” question

J. Whittle noted that the issue is well known and described in the November 2017 report of the ERPB Working Group on Payment Initiation Services (ERPB WG PIS). Again, the main question is in relation to how this will be implemented in practice. Based on the responses received from the API initiatives it seems that unfortunately nobody is fully supporting this functionality.

A. Houlihan requested that this topic would not be closed as it remains a fundamental issue due to the fact that currently there is no clarity whatsoever in relation to what information will be available to the third-party providers (TPPs).

J. Whittle suggested to recommend to the API initiatives that this is an important functionality that is needed by the market and that it could also help the national competent authorities (NCAs) in deciding whether to provide an exemption for the fallback solution.

The EBA reminded about the legal complexity of this topic and mentioned that EBA clarification documents are expected to be finalised by the next API EG meeting.

The ECB representative furthermore added that it would not be desirable for the API EG to come up with guidance that would contradict the recommendations provided in the November 2017 report of the ERPB WG PIS.

The EBA reiterated that a specific requirement was included in article 36 (Data exchanges) 1(c) of the RTS stating that the account servicing payment services providers (ASPSPs) “shall, upon request, immediately provide payment service providers with a confirmation in a simple ‘yes’ or ‘no’ format, whether the amount necessary for the execution of a payment transaction is available on the payment account of the payer.”

It was commented that there should only be an issue in case non-real time booking systems are being used.

J. Whittle proposed to note the issues, to discuss the related functionality with the API initiatives and to coordinate with the EBA once the clarification documents have been made available.

Topic 7: Security challenges

This is still a hot topic and further work is needed in particular in relation to eIDAS certificates.

Topic 8: User information needed to mitigate fraud

The TPPs have prepared a document on this (new) topic which had been shared with the API EG.

Currently TPPs are able to obtain information about the payment service user (PSU) such as the name, address, date of birth and, in Member States where it is applicable, national ID number. Their view is that they need to continue to be able to have access to this information in order to mitigate fraud. For PISPs, more specifically to detect systematic cancellations of payment transactions by the payer and for AIPSPs to be able to know that the data shared by the PSU actually belongs to the PSU, or else AIS-generated data would be impossible to use for any type of risk scoring, creditworthiness evaluation and similar. The ASPSPs view was that they cannot provide certain data about their customers to avoid exposing them to ID theft and hence suggested that the TPPs would obtain this information from the merchants with whom they have a contract.

Reference was also made to the EBA Guidelines on anti-money laundering (AML) but the EBA informed that there is currently no formal decision as yet with regard to updating these guidelines.

It was furthermore commented that the submitted document is not about AML but about fraud mitigation.

The ASPSP side also commented that further clarity would be needed on what additional information ASPSPs are obliged to supply from an AML and fraud mitigation perspective.

The EC representative invited the team working on this topic to provide a clear problem statement following which he would be able to review it and provide feedback.

J. Whittle summarised that the scope of this topic should be further clarified (e.g. what functionalities does it enable? Legality of providing such info?) and as a result the title of this topic should also be changed to avoid confusion. He however added that there is not necessarily a need to publish such a document.

Topic 9: AML related API functionality

The work on this topic was seen as completed. The document was helpful as it clarified a couple of issues.

6. API EG workplan

The API EG agreed earlier that more work needs to be done in relation to the hot topics and that for each of the topics a general conclusion should be provided. The main priority is however the finalisation and publication of the list of recommended API functionalities on the EPC website.

In addition, there is also a number of work items listed in the API EG's terms of reference that have not been addressed as yet and which will need to be tackled after June 2018. To this end the API EG formally asked the EPC to consider extending its support for an additional three months. It was noted that the EPC Board would need to approve such an extension. The EPC will share the position of the EPC Board at the next meeting of the API EG.

The ASPSP side remarked that a three-month extension would need to be seen as a maximum given that the ASPSP systems are being updated (as we speak) and because delayed guidance would result in double costs.

The European Commission (EC) representative agreed that the sooner the ASPSPs are ready for testing the better. The question is however whether the 'early warnings' from the TPPs resulting from interface testing would need to be discussed in a setting like this. He continued by saying that there is a need to focus on implementation issues in order to help ASPSPs maximize their chances of obtaining an exemption to having to provide a fallback solution. It was noted that TPPs are already receiving invitations to start testing.

The EBA reiterated that it intends to publish clarification by the end of June and that it may be helpful and useful for the API EG to wait for this publication before publishing any further documents. The EBA also explained that it is planning to extend its Q&A tool to PSD2 later this month. All Q&As will be published on the EBA website. Anything related to level 1 regulation (i.e. PSD2) will be forwarded to the EC. The EBA moreover highlighted that the process for agreeing responses means it takes time for an answer to be provided.

J. Whittle agreed that the API EG should discuss the topic of testing in order to be able to provide adequate guidance to the market (for example do TPPs need to go to each individual ASPSP or is there a more effective way?).

7. Next meetings (API EG 004-18)

The next meeting of the API EG was scheduled for 25 June 2018 in Brussels

Afternoon session with API initiatives

8. Review responses from API initiatives in relation to the questionnaire on recommended API functionalities (API EG 029-18; responses from API initiatives)

The API initiatives representatives (see Annex I) were thanked for taking the time to respond to the questionnaire and for joining this meeting. A 'tour de table' was initiated to allow everyone to introduce themselves.

J. Whittle informed that the API EG had identified challenging topics in some areas and that the aim would be to work together through the next stages which includes the publication of refined version of the recommended API functionalities by the end of June 2018 on the EPC website. He clarified that the publication would however not include a scoring or comparison table.

The API initiatives confirmed that they had no objections to discuss their views in the presence of the other initiatives. Next they were informed that the idea would be to walk through the questions one by one and to mainly focus on the topics with the least commonalities. It was reiterated that some of the recommended functionalities are required by law and some address a market need.

Before starting the review of the questionnaire, the API initiatives were asked to share their views on testing:

- Although the Berlin Group is a pure standards initiative they see the need to work commonly on this topic for example within a community or with a couple of ASPSPs. A cross border implementation project was setup which covers test concepts, test catalogues on functional, performance and security testing, certification policies etc. for the Berlin Group NextGenPSD2 Standard. This project is also working on requirements on solution provided.
- Stet has specified a requirements document in relation to testing issues and is providing a testing sandbox. They are also about to start with the definition of test cases.
- The Slovak banking API initiative referred to an ASPSP that has a portal where information is published which anyone can test for free without the need of certificates.
- Open Banking UK (OBUK) is using an independent software company that is providing sandbox facilities in the UK. Certification is considered to be an important topic.

While going through the list of questions it was noted that interpretation of the questions resulted in differences with regard to providing a yes or no answer. Following further clarification some of the no answers hence changed into a yes (and vice versa).

Comments noted in relation to the questionnaire are listed below (see also Annex III):

Question 1: Does the API initiative allow for the measurement and monitoring of the API availability, performance and data provided in a way that it can be compared to the interface made available to the payment service user (PSU) for directly accessing its payment account online?

It was clarified that this question is not related to the fact whether the API as such can be measured but more about whether the performance of the API is equivalent to the performance of the customer facing interface.

The ASPSPs are required by law to publish a performance report (not the API initiatives). There is agreement that this topic falls within the responsibility of the ASPSP and not the API initiatives.

Question 2: Does the API initiative allow for the measurement of the API performance in the ASPSP's domain irrespective of performance of the network up to the ASPSP?

Several API initiatives responded that no specific support is needed in this domain.

Question 3: Does the API initiative support PIS and AIS for all online payment accounts, regardless whether the account is held by an individual, legal entity, joint account etc.?

All API initiatives responded positively.

Question 4: Does the API initiative enable the following role-based access?

- (i) a) a "pure PIS" user journey, implying initiation, execution and PISPs receiving the data needed for the purpose of providing PIS and PISPs receiving all information on the initiation of the payment transaction and all information accessible to the ASPSP regarding the execution of the payment transaction PSD2 within a single SCA access session?
- b) a PIS user journey as in (i) a) above and where the TPP would transmit user name, credit transfer scheme, debtor IBAN, creditor IBAN, reference, payment amount and currency to the ASPSP based on which the single SCA would be triggered?
- (ii) a mixed AIS/PIS journey in one communication session (aimed at functional smoothness), implying one SCA to view AIS-regulated data, and one payment execution SCA?
- (iii) a "pure AIS" journey, implying one SCA to view data (no payment execution)?
- (iv) a card-based payment instrument issuer (PIIS) confirmation of available funds?

All API initiatives responded positively.

It was clarified that "credit transfer scheme" can relate to SCT, SCT Inst, domestic (non-SEPA) and international schemes.

Question 5: Does the API enable the TPP to initiate all types of payments in scope of PSD2 that a payer (regardless if it's an individual or legal entity) can initiate in their ASPSP digital channel?

As suggested by the Berlin Group it was agreed that the question could be rephrased to "Does the API enable the ASPSP to offer all payments to".

As the Polish API initiative was not represented it was suggested to follow-up with them to better understand their response. It was commented that it is not yet certain when the next version of the Polish API will be published.

Question 6: Does the API initiative enable TPPs to handle PSU consent independently from the PSU authentication performed with the ASPSP?

All API initiatives responded positively.

OBUK informed that consent is communicated between the PSU and TPP and that the TPP will stage this consent with the ASPSP for authorisation by the PSU. Consent is broken up in granular data clusters. The TPP can however ask the PSU to have access to all data clusters.

The Berlin Group informed that they have also split up consent in 'clusters' (e.g. related to the account, balances, transactions) which are however not as detailed as the OBUK ones. It is up to the PSU to decide which clusters can be accessed by the TPP.

Question 7: Does the API initiative enable the provision of PSU consent for PIS and AIS, using SCA, directly to the ASPSP; via the TPP?

The Slovak banking API initiative informed that they had responded no because consent is handled on the ASPSPs page.

The Berlin Group suggested to rephrase the question as it is too confusing. Some are talking about account information services (AIS) and payment initiation services (PIS), others refer to strong customer authentication.

Question 8: Does the API initiative require the PSU consent to be registered with the ASPSP in any instance?

All API initiatives responded positively.

The Berlin Group noted that this is indeed required by law for confirmation of funds services but not for AIS or PIS.

BEUC wanted to know whether this meant that consent will always be registered with the ASPSP for the three roles. According to OBUK it is about "passing" the consent and the Berlin Group suggested that the question should be rephrased into "Does the API initiative enable the ASPSP to..."

Question 9: Does the API initiative require additional functional steps by the PSU in the provision of PSU consent to providers of payment initiation and account information?

Following further clarification all initiatives responded with No.

Question 10: Does the API initiative impose any restrictions on how the PSU can give/withdraw consent to the TPP?

BEUC wanted to know how a PSU can withdraw a consent. Should this be done via the API or should a PSU ask its ASPSP first? It was noted that this topic had been discussed at the previous meeting and that in response question 15 (see below) had been added.

OBUK informed that they allow a cancellation or revocation on either side. If a PSU would cancel a consent on the ASPSP's side the TPP will know in real-time via the API.

Question 11: Does the API initiative impose any restrictions on the content and/or granularity of the consent given by the PSU to the TPP?

This topic is related to the data cluster discussion (see question 6).

It was suggested to split up this question as follows:

- Does the API initiative enable global consent?
- Does the API initiative enable a more granular consent?

The Berlin Group informed that they indeed offer this functionality but that it is up to the ASPSP to decide how they will implement this.

Question 12: Does the API initiative enable PISPs and AISPs to apply the exemptions to SCA in the same way as other payment services such as cards are allowed to by the ASPSP?

Several API initiatives responded negatively.

It was suggested to remove the reference to “cards”.

Question 13: Does the API initiative enable the TPP to rely on all credentials issued by the ASPSP to its customers in at least each of the following authentication methods?

- (i) embedded;
- (ii) re-direct;
- (iii) decoupled embedded;
- (iv) decoupled redirect.

The majority of API initiatives responded negatively.

J. Whittle explained that the API EG’s concern is that if the API initiatives do not support all the above methods the market will be unable to implement in a consistent way. From the ASPSP side it was however commented that the idea supported by the API EG was that it would be undesirable if only redirection would be supported but it was never agreed that all authentications methods should be offered.

The Berlin Group suggested to differentiate between methods (e.g. fingerprints) and models (e.g. redirection).

J. Whittle noted that it was disappointing to see that only one API initiative supports this functionality. He continued by saying that the wording could be “massaged” but that the recommendation as such needs to stay.

TPPs raised a concern regarding the fact that it does not even seem to be on the roadmap for future versions of the API standard. OBUK commented that they are still evaluating the embedded model and are committed to publish a standard for the decoupled model.

Question 14: Does the API initiative enable the ASPSP to apply the same exemptions from SCA when the API is used as when the PSU interacts directly with the ASPSP?

All the API initiatives responded positively. The Berlin Group suggested to replace “to apply” by “to offer”.

Question 15: Does the API initiative support PSU consent management between the TPP and ASPSP?

BEUC wondered how “consent management” should be interpreted in this question. Is it the consent the TPP provides to the ASPSP? How can a cancellation be managed (only via TPP or via ASPSP)? He continued by saying that a PSU should have the right to cancel its consent at any time, but it is not clear how this can be done. J. Whittle recognised the dilemma but added that this functionality is not required by law. In response BEUC referred to the GDPR.

EBA noted that consent management was a challenge with differences of opinion depending on the angle of focus (e.g. consumer protection angle) and that this is something the EBA may wish to consider more in depth as part of its role to support supervisory convergence.

Question 16: Does the API initiative manage the use of eIDAS certificates for mutually authenticating the parties and securing the communication session?

The Berlin Group commented that eIDAS certificates are only mandated by law for TPP identification but not for ASPSP identification (unless they act in the role of a TPP). An ASPSP could hence reuse its current web site certificates for TLS. They added that the question should be rephrased as follows: "Does the API initiative enable the ASPSP to identify the TPP by eIDAS certificates.". From the TPP side it was noted that not using eIDAS certificates for ASPSP identification could potentially lead to identity spoofing.

Stet was of the view that this is not an API topic. Moreover, they noted that it is not good practice to use the same certificate for both roles.

OBUK informed that at the time they had to go live in January 2018 there were no eIDAS providers in the market as yet. They are however looking to ensure that their solution will be fully in line with eIDAS in the near future.

J. Whittle summarised that further work is needed and that the question should be refined in relation to the eIDAS certificate.

Question 17: Does the API initiative enable:

- i. the PISP to access all information on the payment initiation and the execution of the payment that is accessible to the PSU directly?**
- ii. the AISP to access the same information from designated payment accounts as made available to the PSU directly, provided that for AISPs, this information does not include sensitive payment data?**
- iii. the AISP to access the same information from payment transactions on designated payment accounts as made available to the PSU directly**
- iv. the card-based payment instrument issuer (PIIS) to access information to confirm the availability of funds?**

All API initiatives responded positively.

Question 18: Does the API initiative enable the ASPSP to provide non-payment account information which may be available in the payment account to the PSU directly?

Several API initiatives saw this rather as an (optional) extended added value service.

Question 19: Does the API initiative enable the PISP access to the “available balance” (= account balance, plus any overdraft limit, minus pending/scheduled transactions) and ex-post available balance (post payment initiation) – if the ASPSP works with ‘delayed booking’ and such information is accessible to the PSU when initiating an online payment and with the PSU’s consent on the type of data accessed and the purpose of the processing (and as long as the PISP is not storing or using that information for other purposes) – and acknowledges that the payment order is placed; on that basis the PISP is able to assess the risk of non-execution?

The TPPs informed that this is a showstopper as they cannot continue to offer the same level of service unless they have access to certain account data. They also made a reference to the conclusions in the November 2017 report of the ERPB WG on PIS and found it disappointing that this had not been considered by the API initiatives.

The Berlin Group noted that an ASPSP cannot be mandated to offer this information but as an API initiative they do enable the ASPSP to provide this information.

OBUK believes that a payment initiation service provider (PISP) is not allowed to receive this data. If it was allowed by law then OBUK would consider supporting this functionality.

The EC asked OBUK whether they could share the legal analysis based on which they had decided that this would be against the law. The EBA explained that this is an area the EBA is focusing on and expected to provide clarity on. The EBA anticipates that its clarification will be available before the 25 June meeting of the API EG.

Question 20: In the case of an ASPSP that does not work with “real-time booking”, does the API initiative enable PISP access to:

- i. a technical OK/Not OK status where an OK means that the payment order has been validated by the ASPSP and irrevocably authorised by the PSU, while limits, profile check may take place later?**
- ii. the payment status after the planned moment for execution of the payment order?**
- iii. a confirmation from the ASPSP that the payment will be executed?**

All API initiatives responded positively.

Question 21: In the case of an ASPSP that works with “real-time” booking, does the API initiative enable PISP access to:

- i. information about the initiation and the execution of the payment transaction as is made available to the PSU when the transaction is initiated directly?**
- ii. information about the initiation and execution of the payment transaction that is available to the ASPSP but not made available to the PSU?**
- iii. receive a confirmation from the ASPSP that the payment will be executed?**

In general, all API initiatives responded positively.

Stet requested further clarification in relation to item ii as it was not clear what sort of information this would be. It was commented that this could refer to information which was shared with the TPP but not yet with the PSU. The API EG agreed that further clarification would indeed be helpful (related to a specific RTS article?)

The Berlin Group commented that this is not an API question.

Question 22: Does the API initiative permit transference of data between the TPP and ASPSP pertinent to SCA exceptions, or related data such as for fraud monitoring and risk analysis such as SCA exemptions, TRA data?

All API initiatives responded positively. There was however some discussion about the exact data.

Question 23: Does the API initiative enable the identification of a PSP when providing AIS or PIS with an eIDAS certificate?

All API initiatives responded positively.

Question 24: Does the API initiative enable communication sessions to be uniquely and unambiguously identified between the TPP and ASPSP for each PSD2 role-based operation?

All API initiatives responded positively. A clear definition of "communication session" would however be helpful.

Question 25: Does the API initiative enable the ASPSP's change control procedure?

All API initiatives responded positively. Stet however commented that this is not an API feature as such.

Question 26: Does the API initiative:

- i. follow communication standards issued by international or European standardisation organisation?
- ii. require the TPP to use specific tools or software?

All API initiatives responded positively.

Question 27: Does the API initiative enable compliance with legal requirements (GDPR & PSD2)?

All API initiatives responded positively.

Question 28: Does the API initiative support traceability?

All API initiatives responded positively. Stet however commented that this is not an API feature as such.

From the TPP side it was noted that it is crucial to have an execution ID for each transaction.

Question 29: Does the API initiative support error messaging?

All API initiatives responded positively.

Question 30: Does the API initiative ensure identification other than using eIDAS identification?

The Berlin Group informed that they will not support scenarios where TPPs do not have an eIDAS certificate.

The EBA commented that the Qualified Trust Service Providers (QTSPs) that are listed on a dedicated webpage of the EC might issue certificates for national identification but not necessarily qualified certificates for commercial purposes. The question is hence whether there will be a performant market of QTSPs issuing qualified certificates as per PSD2.

The Berlin Group did not have a concern about the availability of qualified certificates but rather about the lack of synchronisation between the NCAs and QTSPs in particular in relation to the revocation of certificates. The EBA informed that they are looking into this topic with the NCAs.

Question 31: Does the API initiative enable:

- i. recurring transactions?**
- ii. future dated transactions?**
- iii. standing orders?**
- iv. including SCA exemptions for (i)-(iii) above?**

There is no uniformity in the responses of the API initiatives. The API EG discussed the difference between recurring transactions and standing orders.

The EBA informed that in the context of the RTS, an example of a recurring transaction would include a subscription to a music streaming provider using a card.

It was commented that recurring payments in the context of the RTS only exist in the context of card payments.

For recurring payments, the ASPSP will get (in the background) each time a request comes from the TPP. It is hence the TPP (on behalf of the payee) that initiates the payment. In case of a standing order it is the payer that initiates the payment.

J. Whittle concluded that further work is needed to clarify this topic in order to be able to provide unambiguous guidance to the market.

Question 32: Does the API initiative allow for cancellations of payment orders by the payer following transmission of such payment order to the TPP?

Several API initiatives do not support this functionality. It was suggested that also here a distinction should be made between recurring payments, future dated payments and standing orders.

Question 33: Does the API initiative enable the PSU to manage the trusted beneficiary list (including adding a new beneficiary) via the AISP/PISP?

The majority of API initiatives do not support this functionality.

The Berlin Group stated that this is not required by law and should rather be seen as an added value service. OBUK informed that this is currently still under discussion/development.

J. Whittle noted that there is a consensus regarding the fact that TPPs cannot amend the list of trusted beneficiaries, but they can however view the data in this list.

BEUC remarked that AISPs should also provide an overview (to the PSUs) of entities to which the PSU has provided its consent.

9. Next step

J. Whittle concluded that the afternoon session with the API initiatives had been very helpful. As a next step, the API EG will need to produce a list of recommended API functionalities and for this the API EG might potentially require further input from the API initiatives.

At its next meeting on 25 June 2018 the API EG will need to further refine this list and reconcile it with the anticipated clarification documents from the EBA.

As mentioned before, the API EG aims to publish a list of recommended API functionalities by the end of June 2018. The API EG also agreed to extend the work of the group for another 3 months in order to be able to tackle other deliverables such as testing that are included in its terms of reference.

10. Closure of the meeting

The co-chair J. Whittle closed the meeting at around 16h45 CEST and thanked the participants for the constructive meeting.

Annex I: List of attendees

Category	Name	Institution	Attendance
Co-Chairs	James Whittle	NPSO Ltd	Yes
	Oscar Berglund	Trustly Group AB	Apologies
TPP Members	Joan Burkovic	Bankin'	Apologies
	Aoife Houlihan	Klarna	Yes
	Ralf Ohlhausen	PPRO	Yes
ASPSP Members	Marieke van Berkel	EACB	Yes
	Gijs Boudewijn	Dutch Payments Association (representing EBF)	Yes
	Emil Johansson	Swedbank (representing ESG)	Yes
PSU Members	Jean Allix	BEUC	Yes
	Tarik Zerkti ¹	Ecommerce Europe	Yes
	Pascal Spittler	IKEA (representing EuroCommerce)	Yes
Other Members	Thaer Sabri	EMA	Apologies
	Krzysztof Korus	Polish Payment Institution Association (representing EPIF)	Yes
Observers	Ralf Jacob	European Commission	Yes
	Philippe Pellé	European Commission	Apologies
	Krzysztof Zurek	European Commission	Yes
	Nilixa Devlukia	EBA	Yes
	Helene Oger-Zaher	EBA	Yes
	Ann Börestam	ECB	Yes
Linking pin with technical experts	Arturo G. Mac Dowell	Eurobits	Yes
Guest	Lorenzo Gaston	Gemalto (Convenor ISO TC 68 / SC2 / SG1 TPP)	Yes
Secretariat	Etienne Goosse	EPC	Yes (AM)
	Christophe Godefroi	EPC	Yes

¹ Alternate to Just Hasselaar

Representatives of API initiatives (only afternoon session)

API initiatives	Ortwin Scheja	Berlin Group	Yes
	Miguel Torres Vila	Berlin Group (Redsys)	Yes
	Imran Gulamhuseinwala	Open Banking UK	Yes
	Chris Michael	Open Banking UK	Yes
	Robache Hervé	Stet	Yes
	Rodolphe Meyer ²	Stet	Yes
	Maciej Kostro	Polish Bank Association	Apologies
	Wojciech Pantkowski	Polish Bank Association	Apologies
	Peter Kopriva ³	Slovak Banking Association	Yes
	Marcel Laznia	Slovak Banking Association	Yes

² Replacing Alain Benedetti

³ Replacing Rastislav Hudec

Annex II Meeting Calendar

2018	API EG Meetings
January	<p align="center">29 January 2018 (11:00-16:00 CET) EPC, Brussels</p>
February	<p align="center">22 February 2018 (10:00-12:00 CET) Conference call</p>
	<p align="center">27 February 2018 (13:30–18:00 CET) – preceded by lunch as from 12:45 CET EPC, Brussels</p>
	<p align="center">28 February 2018 (9:00-10.30 CET) 28 February 2018 (11:00-16:00 CET) API Evaluation Workshop with 5 API initiatives EBF, Brussels</p>
March	<p align="center">27 March 2018 (09:00-17:00 CEST) Brussels – EPC</p>
April	<p align="center">12 April 2018 (10.00-11.00 CEST) - Conference call</p>
	<p align="center">23 April 2018 (10.30-17.00 CEST) - EPC, Brussels</p>
May	<p align="center">14 May 2018 (10.30-18.00 CEST) - EPC, Brussels</p>
	<p align="center">24 May 2018 (11.00-12.00 CEST) – Conference call with API initiatives</p>
June	<p align="center">8 June 2018 (10.00-17.00 CEST) - Brussels</p>
	<p align="center">25 June 2018 (10:30-17:00 CEST) – EPC, Brussels</p>

Annex III Questions related to recommended functionalities to be supported by the API Initiatives

N°	Questions	Response
	API performance measurement	
1	Does the API initiative allow for the measurement and monitoring of the API availability, performance and data provided in a way that it can be compared to the interface made available to the payment service user (PSU) for directly accessing its payment account online?	YES/NO
2	Does the API initiative allow for the measurement of the API performance in the ASPSP's domain irrespective of performance of the network up to the ASPSP?	YES/NO
	API functionalities	
3	Does the API initiative support PIS and AIS for all online payment accounts, regardless whether the account is held by an individual, legal entity, joint account etc.?	YES/NO
4	<p>Does the API initiative enable the following role-based access?</p> <p>(v) a) a "pure PIS" user journey, implying initiation, execution and PISPs receiving the data needed for the purpose of providing PIS and PISPs receiving all information on the initiation of the payment transaction and all information accessible to the ASPSP regarding the execution of the payment transaction PSD2 within <u>a single SCA access session</u>?</p> <p>b) a PIS user journey as in (i) a) above and where the TPP would transmit user name, credit transfer scheme, debtor IBAN, creditor IBAN, reference, payment amount and currency to the ASPSP based on which the single SCA would be triggered?</p> <p>(vi) a mixed AIS/PIS journey in one communication session (aimed at functional smoothness), implying one SCA to view AIS-regulated data, and one payment execution SCA?</p> <p>(vii) a "pure AIS" journey, implying one SCA to view data (no payment execution)?</p> <p>(viii) a card-based payment instrument issuer (PIIS) confirmation of available funds?</p>	<p>ia YES/NO</p> <p>ib YES/NO</p> <p>ii YES/NO</p> <p>iii YES/NO</p> <p>iv YES/NO</p>
5	Does the API enable the TPP to initiate all types of payments in scope of PSD2 that a payer (regardless if it's an individual or legal entity) can initiate in their ASPSP digital channel?	YES/NO
	Consent management and authentication	
6	Does the API initiative enable TPPs to handle PSU consent independently from the PSU authentication performed with the ASPSP?	YES/NO
7	Does the API initiative enable the provision of PSU consent for PIS and AIS, using SCA, directly to the ASPSP; via the TPP?	YES/NO

8	Does the API initiative require the PSU consent to be registered with the ASPSP in any instance?	YES/NO
9	Does the API initiative require additional functional steps by the PSU in the provision of PSU consent to providers of payment initiation and account information?	YES/NO
10	Does the API initiative impose any restrictions on how the PSU can give/withdraw consent to the TPP?	YES/NO
11	Does the API initiative impose any restrictions on the content and/or granularity of the consent given by the PSU to the TPP?	YES/NO
12	Does the API initiative enable PISPs and AISPs to apply the exemptions to SCA in the same way as other payment services such as cards are allowed to by the ASPSP?	YES/NO
13	<p>Does the API initiative enable the TPP to rely on all credentials issued by the ASPSP to its customers in at least each of the following authentication methods?</p> <ul style="list-style-type: none"> (v) embedded; (vi) re-direct; (vii) decoupled embedded; (viii) decoupled redirect. <p>Note: see authentication guidance document published on the EPC website (link: https://www.europeanpaymentscouncil.eu/document-library/minutes-and-agendas/authentication-sca-guidance-key-topic-clarification-api)</p>	YES/NO
14	Does the API initiative enable the ASPSP to apply the same exemptions from SCA when the API is used as when the PSU interacts directly with the ASPSP?	YES/NO
15	Does the API initiative support PSU consent management between the TPP and ASPSP?	YES/NO
16	Does the API initiative manage the use of eIDAS certificates for mutually authenticating the parties and securing the communication session?	YES/NO
Access to information		
17	Does the API initiative enable:	i YES/NO
	(i) the PISP to access all information on the payment initiation and the execution of the payment that is accessible to the PSU directly?	ii YES/NO
	(ii) the AISP to access the same information from designated payment accounts as made available to the PSU directly, provided that for AISPs, this information does not include sensitive payment data?	iii YES/NO
	(iii) the AISP to access the same information from payment transactions on designated payment accounts as made available to the PSU directly	iv YES/NO
	(iv) the card-based payment instrument issuer (PIIS) to access information to confirm the availability of funds?	

18	Does the API initiative enable the ASPSP to provide non-payment account information which may be available in the payment account to the PSU directly?	YES/NO
19	Does the API initiative enable the PISP access to the “available balance” (= account balance, plus any overdraft limit, minus pending/scheduled transactions) and ex-post available balance (post payment initiation) – if the ASPSP works with ‘delayed booking’ and such information is accessible to the PSU when initiating an online payment and with the PSU’s consent on the type of data accessed and the purpose of the processing (and as long as the PISP is not storing or using that information for other purposes) – and acknowledges that the payment order is placed; on that basis the PISP is able to assess the risk of non-execution?	YES/NO
20	In the case of an ASPSP that does not work with “real-time booking”, does the API initiative enable PISP access to:	i YES/NO
	i. a technical OK/Not OK status where an OK means that the payment order has been validated by the ASPSP and irrevocably authorised by the PSU, while limits, profile check may take place later?	ii YES/NO
	ii. the payment status after the planned moment for execution of the payment order? iii. a confirmation from the ASPSP that the payment will be executed?	iii YES/NO
21	In the case of an ASPSP that works with “real-time” booking, does the API initiative enable PISP access to:	i YES/NO
	i. information about the initiation and the execution of the payment transaction as is made available to the PSU when the transaction is initiated directly?	ii YES/NO
	ii. information about the initiation and execution of the payment transaction that is available to the ASPSP but not made available to the PSU? iii. receive a confirmation from the ASPSP that the payment will be executed?	iii YES/NO
<i>Fraud data and security</i>		
22	Does the API initiative permit transference of data between the TPP and ASPSP pertinent to SCA exceptions, or related data such as for fraud monitoring and risk analysis such as SCA exemptions, TRA data?	YES/NO
23	Does the API initiative enable the identification of a PSP when providing AIS or PIS with an eIDAS certificate?	YES/NO
24	Does the API initiative enable communication sessions to be uniquely and unambiguously identified between the TPP and ASPSP for each PSD2 role-based operation?	YES/NO
<i>API Evolution and development</i>		
25	Does the API initiative enable the ASPSP’s change control procedure?	YES/NO
<i>Standards/software</i>		

26	Does the API initiative:	i YES/NO
	(i) follow communication standards issued by international or European standardisation organisation? (ii) require the TPP to use specific tools or software?	ii YES/NO
Other		
27	Does the API initiative enable compliance with legal requirements (GDPR & PSD2)?	YES/NO
28	Does the API initiative support traceability?	YES/NO
29	Does the API initiative support error messaging?	YES/NO
30	Does the API initiative ensure identification other than using eIDAS identification?	YES/NO
31	Does the API initiative enable:	i YES/NO
	(i) recurring transactions?	ii YES/NO
	(ii) future dated transactions? (iii) standing orders?	iii YES/NO
	(iv) including SCA exemptions for (i)-(iii) above?	iv YES/NO
32	Does the API initiative allow for cancellations of payment orders by the payer following transmission of such payment order to the TPP?	YES/NO
33	Does the API initiative enable the PSU to manage the trusted beneficiary list (including adding a new beneficiary) via the AISP/PISP?	YES/NO