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Summary of the 20th Meeting of the API Evaluation Group

3 October 2018, 10h00-17h00 CEST
EPC, Cours Saint-Michel 30A, 1040 Brussels
(Approved by the API EG Members)

1. Welcome

The co-Chairs, J. Whittle (NPSO Ltd) and O. Berglund (Trustly Group AB) welcomed the participants to the twentieth meeting of the API Evaluation Group (EG). Please see Annex I for the list of attendees.

This meeting will mainly focus on the continuation of the review of the recommended functionalities with the aim of sending a baselined draft version as input to 11 October 2018 conference call with the API initiatives as well as on the preparation of his call.

2. Preparation of the 11 October 2018 conference call with the API initiatives

As agreed at the previous meeting, the five[1] API initiatives will be invited to the 11 October API EG conference call to share their views on the draft baselined version of recommended functionalities. This document will be sent in advance to the API initiatives to allow them to prepare their views. In addition, they will be asked to explain how they plan to support the user community implement, test and conform to their specifications.

The outcome of the 11 October API EG call will also be helpful input for the workshop organised by the EBA on 17 October 2018 to which besides the national competent authorities (NCAs) and the API EG co-Chairs, a number of API initiatives will be invited. The focus will be on getting a better understanding of the range of API initiatives and to find out whether any implementation work is foreseen. In preparation of this workshop, the EBA had asked NCAs to inform them which API initiatives they were aware of and if these initiatives were looking at implementation. On this basis four API initiatives had been invited to the 17 October workshop i.e. CBI, Berlin Group, LUXHUB and Open Banking UK. An ECSA representative commented that some of these are country specific initiatives that do not necessarily provide implementation support and added that in the Netherlands there also exists a national implementation support initiative.

In addition, the EBA is planning a more general discussion with a larger group of API initiatives in late October 2018.

J. Whittle highlighted that it will be important to understand whether there is consistency between the API initiatives with regard to the recommended functionalities. It was mentioned that it could also make sense to send this document to CBI and LUXHUB in order to try to reach even greater harmony. Coordination is indeed important

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[1] Berlin group; Open Banking UK; PolishAPI; Slovak Banking API; STET

in order to avoid that the initiatives are solving issues differently. The message which could be relayed to the initiatives is that although it is good to support local markets (taking into account the different conditions) it however leaves a vacuum on how coordination will be ensured. There is hence a need for broader cross-community coordination to minimise this risk. The basis to start the dialogue at the 11 October call with the API initiatives will be the recommended functionalities document.

An ECSA representative commented that an account-servicing payment service provider (ASPSP) that is for example active in ten different countries might have to provide ten local flavours in relation to strong customer authentication (SCA). These local flavours could however be provided with the same API.

A TPP representative commented in relation to national implementation that one single API per country would be good for TPPs and that merchants also work on a country basis. The EuroCommerce representative however reacted by saying that retailers would also like to have a pan-European approach in order to be able to offer a uniform customer experience. J. Whittle noted that as a first step the aim would be to ensure consistency in the implementation of a specification.

3. Review of the draft internal recommended functionalities document

J. Whittle reiterated that the aim would be to finalise a baselined draft version of the recommended functionalities in order to be able to send it to the API initiatives ahead of the 11 October call. He added that it is probably not realistic to expect that everyone will agree on everything and hence the importance of being able to explain in a clear and comprehensive way the different views.

It was noted that in relation to certain functionalities the EBA is expected to provide further clarity via its Q&A tool. To this end the EBA may where possible aim to prioritise relevant questions and to inform the API EG when these Q&As will be published. These functionalities will be earmarked in the document in order to clarify that there is no decision as yet (please see below).

The API EG reviewed all the recommended functionalities (RF) and the following comments were noted:

- It was clarified that "available balance" is defined in the EBA Opinion.
- The RF "provide or make available to the PISP a confirmation from the ASPSP that the payment will be executed" does not apply to card-based payment instrument issuers (CBPIIs).
- Different views in relation to redirection will be included in the third column. Sanity check on alignment of language remains to be done.
- RF "prior to initiation of the payment, provide or make available to the PISP the IBANs (or equivalents) and currencies as available to the payment service user (PSU) for all payment accounts". This topic is in the process of being clarified by the EBA.
- RF "provide or make available to the PISP the name of the PSU (payer)". An ECSA representative noted that the view of the ASPSPs is that the name of the PSU does not need to be provided to the TPP as it is not needed to initiate a payment and as the TPP should also have a client relationship with the PSU. TPPs commented that in certain scenarios existing today the TPP customer is the merchant and not the PSU directly. It was agreed that the different views should be listed at least until further clarity is obtained via the EBA's Q&A tool. The EBA commented that in case of a one-

off PISP use, the PSU could for instance provide its consent via for example ticking a box.

- A TPP representative informed that account information service providers (AISPs) need the PSU's name in order to be able to prevent fraud.
- RF "provide or make available to the PISP the current balance of the payment account prior and/or after the initiation of the payment in case such balance is shown to the PSU directly". BEUC is of the view that the PISP should not see the balance of the PSU. TPPs informed that the provision of balance information to help inform the PSU when making a payment is a key part of the user experience. This topic is in the process of being clarified by the EBA.
- RF "In the event that the ASPSP does not have a system that enables it to adequately respond to the yes/no confirmation request sent by the provider initiating the payment, it must provide the PISP with the necessary information required to assess whether there will be sufficient funds available at the time of execution of the payment." The EBA clarified that if the ASPSP cannot provide the yes/no answer it needs to provide the data as specified in the EBA Opinion.
- RF "Provide data granularity in terms of data elements and time range covered (e.g. account statement data for a particular account over a certain amount of time) to ensure that there is an efficient way to access the appropriate data as per the PSU consent. Data minimisation principles apply." This topic is in the process of being clarified by the EBA. The EBA reiterated following a question of a TPP representative that the AISP should get the same information as the PSU is getting via its ASPSP when accessing its account online.
- RF "Provide access to the trusted beneficiary list to the PISP". This topic is in the process of being clarified by the EBA. The BEUC representative commented that contrary to AIS, the PISP does not need access to this list and that if the PISP would like to suggest the addition of a new name, a specific SCA would need to be required.
- RF "Should not require the AISP or PISP to use specific tools or software when using the API." TPPs commented that they should not be required to implement proprietary ASPSP software.
- RF "Should enable the ASPSP to support a "pure" PIS journey, with a single SCA, whereby the PISP provides the ASPSP with the payer IBAN; the payment scheme to be used; the creditor name and IBAN (Account Number and routing identifier where applicable); a transaction reference; the payment amount, and the currency of the payment, based on which the single SCA (dynamic linking) is triggered." An ECSA representative commented that it is nowhere defined what a "pure" PIS journey means. In response, a TPP representative replied that the aim is to avoid an extra step.
- RF "Should allow the PSU to set up and stop a recurring transaction (including card payments) through the PISP". It will need to be checked with the API Initiatives how this will be supported.
- RF "Should enable AISPs access AIS-regulated information 4 times a day where the customer does not actively request such information." A TPP representative explained that "actively request" is not the same as "in session" as the latter could last for up to 24 hours. The EBA clarified that if the customer is not actively asking then the AISP needs to respect the 4 times a day limitation. If a customer actively requests there is no limitation.
- On request of the BEUC representative, the following RF was added "Should require that when an agreement is cancelled by the consumer to the ASPSP or the TPP, the party which has received the cancellation should inform the other party".
- RF "Should allow the transmission of credentials by or through AISPs and PISPs (forwarding of credentials) where applicable." It was agreed that further details

related to transmittable credentials should be copied from the SCA guidance document which was published by the API EG on the EPC website in April 2018.

- TPPs to decide what input needs to be copied from the annex for the RFs related to authentication methods.
- It was agreed to remove RF "Should not put restrictions on data related to the availability, data quality provided and performance of the API to be communicated through the API".

4. Next steps

The API EG co-Chairs together with the secretariat will update the document in line with today's input. This updated version will be shared with the API EG by Friday 5 October 2018 to give API EG members an opportunity to provide any final minor comments. Next, a baselined draft version of the recommended functionalities will be sent to the API initiatives as input to the 11 October 2018 conference call.

5. Closure of the meeting

The co-Chairs closed the meeting at around 17h00 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	Dial-in
TPP Members	Joan Burkovic	Bankin'	Dial-in
	Aoife Houlihan	Klarna	Apologies
	Ralf Ohlhausen	PPRO	Dial-in
ASPSP Members	Marieke van Berkel	EACB	Yes
	Gijs Boudewijn	Dutch Payments Association (representing EBF)	Yes
	Emil Johansson	ESBG	Yes
PSU Members	Jean Allix	BEUC	Yes
	Just Hasselaar	Ecommerce Europe	Apologies
	Pascal Spittler	IKEA (representing EuroCommerce)	Yes
Other Members	Thaer Sabri	EMA	
	Peter Cornforth	Paysafe (representing EPIF)	Yes
Observers	Ralf Jacob	European Commission	Yes
	Remo Croci	European Commission	Yes
	Helene Oger-Zaher	EBA	Dial-in
	Larisa Tugui	EBA	
Linking pin with technical experts	Arturo G. Mac Dowell	Eurobits	Yes
Guest	Lorenzo Gaston	Gemalto (Convenor ISO TC 68 / SC2 / SG1 TPP)	Dial-in
	Diederik Bruggink	ESBG	Yes
Secretariat	Etienne Goosse	EPC	Yes
	Christophe Godefroi	EPC	Yes

Annex II: Action points of the 20th meeting of the API EG

Item	Action	Owner	Status / Deadline
20-1	Provide to the API EG an updated draft baselined version of the recommended functionalities	API EG co-Chairs EPC secretariat	5 October 2018
20-02	Provide any final minor comments to the draft baselined version of the recommended functionalities	API EG members	8 October 2018
20-03	Send the draft baselined version of the recommended functionalities to the API initiatives	API EG co-Chairs EPC secretariat	9 October 2018

Annex III Meeting Calendar

2018	API EG Meetings
January	**29 January 2018 (11:00-16:00 CET)** EPC, Brussels
February	**22 February 2018 (10:00-12:00 CET)** Conference call
	27 February 2018 (13:30–18:00 CET) – preceded by lunch as from 12:45 CET EPC, Brussels
	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
March	**27 March 2018 (09:00-17:00 CEST)** Brussels – EPC
April	**12 April 2018 (10.00-11.00 CEST)** - Conference call **23 April 2018 (10.30-17.00 CEST)** - EPC, Brussels
May	**14 May 2018 (10.30-18.00 CEST)** - EPC, Brussels **24 May 2018 (11.00-12.00 CEST)** – Conference call with API initiatives
June	**8 June 2018 (10.30-17.00 CEST)** – Hotel Warwick, Brussels **25 June 2018 (10:30-17:00 CEST)** – EPC, Brussels
July	**11 July 2018 (11:00-13:00 CEST)** – Conference call **18 July 2018 (11:00-13:00 CEST)** – Conference call **30 July 2018 (10:30-17:00 CEST)** – EPC, Brussels
August	**24 August 2018 (12:00-14:00 CEST)** – Conference call **28 August 2018 (15:00-17:00 CEST)** – Conference call **31 August 2018 (11:00-13:00 CEST)** – Conference call
September	**3 September 2018 (10:30-17:00 CEST)** – EPC, Brussels **18 September 2018 (15.30-17:00 CEST)** – Conference call **24 September 2018 (10:30-17:00 CEST)** – EPC, Brussels
October	**3 October 2018 (10:00-17:00 CEST)** – EPC, Brussels **11 October 2018 (14:00-15:30 CEST)** – Conference call with API initiatives