SPL Scheme Rulebook
2019 Change Request
Public Consultation Document

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1 Introduction

It is a key objective of the EPC that the SEPA Proxy Lookup (SPL) scheme is able to develop with an evolving payments market. To meet the demands of the scheme participants and stakeholders including end-users and PSP communities, the SPL scheme is subject to a change management process that is structured, transparent and open, governed by the rules of the management and evolution function of SEPA Scheme Management.

This SPL Scheme Rulebook 2019 Change Request Public Consultation Document details:

- Change requests submitted by stakeholder representatives including PSPs or PSP communities and by the EPC’s SPL Scheme Participant Group (SPG) for possible modifications to be introduced into the next version (v2.0) of the SPL scheme rulebook.

- SPL SPG recommendations on the way forward with regard to the individual change requests.

The EPC submits this document for public consultation in accordance with the procedures set out in the SPL scheme rulebook (for further details please check section 3.2 ‘Maintenance and Evolution (change management process)’).  

The public consultation period will run from 24 May until 26 August 2019.

All interested parties with a legitimate interest are encouraged to provide feedback on the possible changes to be introduced into the next version of the SPL scheme rulebook by returning the completed response template (EPC104-19) to SPLchangerequest@epc-cep.eu by 26 August 2019 at 19h00 CEST at the latest.

Note: The EPC at all times reserves the right to make changes to the SPL scheme rulebook deemed necessary in order to ensure that the SPL scheme rulebook complies with applicable EU legislation and amendments thereto.

2 Change request review procedure

In accordance with section 3.2.5 of the SPL scheme rulebook, the SPL SPG analysed (a) whether the change as suggested in a change request falls within the scope of the SPL scheme and (b) whether the change proposed by the change request is a:

- A minor change: a change of an uncontrovertial and usually technical nature that facilitates the comprehension and use of the rulebook, or;

- A major change: a change that affects or proposes to alter the substance of the rulebook and the scheme.

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All change requests that comply with the published EPC template for change requests and with the section 3.2.5 of the rulebook have been included in this document.

As required by the SPL scheme rulebook, the SPL SPG has issued a recommendation on the way forward with regard to each change request. Each recommendation reflects one of the following options:

a) The change request is **already provided for** in the scheme: no action is necessary for the EPC.

b) The change request **should be incorporated into the scheme**: the change request becomes part of the scheme and the rulebook is amended accordingly.

c) The change request **should be included in the scheme** as an **optional feature**:
   - The new feature is optional, and the rulebook will be amended accordingly;
   - Each scheme participant\(^2\) may decide to offer the feature to its customers, or not.

d) The change request **is not considered fit for the SEPA geographic area**

e) The change request **cannot be part** of the scheme for one of the following reasons:
   - It is technically impossible or otherwise not feasible (to be explained on a case by case basis);
   - It is out of scope of the EPC.

### 3 Overview Change Requests to the SPL scheme Rulebook v1.0

The EPC received a total of 18 change requests, categorised as follows:

- 11 major change requests (for detailed information see section 4).
- 7 minor change requests (for detailed information see section 5).

The original change requests documents that were submitted to the EPC can be found in Annex 1.

The below table lists all the received change requests (CR):

\(^2\) A participant which has formally adhered to an EPC SEPA scheme.
<table>
<thead>
<tr>
<th>CR item</th>
<th>Minor or Major</th>
<th>Topic</th>
<th>Contributor</th>
<th>Recommendation of the SPL SPG on the proposed way forward. The final decision is subject to the outcome of the public consultation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Major</td>
<td>Email address to be included as an additional alias</td>
<td>equensWorldline</td>
<td>Should be incorporated as an option into the scheme - <strong>option c</strong>.</td>
</tr>
<tr>
<td>2</td>
<td>Major</td>
<td>Increase scope to merchant payments (payments at POI)</td>
<td>equensWorldline</td>
<td>Cannot be part of the existing scheme – <strong>option e</strong>.</td>
</tr>
<tr>
<td>3</td>
<td>Major</td>
<td>Notifications</td>
<td>equensWorldline</td>
<td>Cannot be part of the existing scheme – <strong>option e</strong>.</td>
</tr>
<tr>
<td>4</td>
<td>Major</td>
<td>Allow participants from outside Europe</td>
<td>equensWorldline</td>
<td>Not considered fit for the SEPA geographic area – <strong>option d</strong>.</td>
</tr>
<tr>
<td>5</td>
<td>Minor</td>
<td>Support non-EUR currencies for the amount parameter.</td>
<td>equensWorldline</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>6</td>
<td>Major</td>
<td>Payment requests.</td>
<td>equensWorldline</td>
<td>Cannot be part of the existing scheme – <strong>option e</strong>.</td>
</tr>
<tr>
<td>7</td>
<td>Major</td>
<td>Support customer onboarding.</td>
<td>equensWorldline</td>
<td>Should be incorporated as an option into the scheme - <strong>option c</strong>.</td>
</tr>
<tr>
<td>8</td>
<td>Major</td>
<td>Disclosure information by Initiating Registry Provider (IRP) to its customers.</td>
<td>Latvijas Banka</td>
<td>Cannot be part of the existing scheme – <strong>option e</strong>.</td>
</tr>
<tr>
<td>9</td>
<td>Major</td>
<td>Additional end-to-end data security/integrity requirement.</td>
<td>Polish Bank Association</td>
<td>Should be incorporated into the scheme - <strong>option b</strong>.</td>
</tr>
<tr>
<td>10</td>
<td>Major</td>
<td>Extending proxies &amp; revisit/update participants eligibility requirements.</td>
<td>MasterCard</td>
<td>The change is already provided for in the scheme – <strong>option a</strong>.</td>
</tr>
<tr>
<td>11</td>
<td>Minor</td>
<td>Section 2.1 Eligibility for participation: clarify difference between &quot;directly&quot; and &quot;indirectly&quot;.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>12</td>
<td>Minor</td>
<td>Section 2.5.1. Obligations of an IRP: editorial update.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>CR item</td>
<td>Minor or Major</td>
<td>Topic</td>
<td>Contributor</td>
<td>Recommendation of the SPL SPG on the proposed way forward. The final decision is subject to the outcome of the public consultation.</td>
</tr>
<tr>
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<td>------------------------------------------------------------------</td>
</tr>
<tr>
<td>13</td>
<td>Minor</td>
<td>Section 2.5.2. Obligations of an RRP: clarify meaning of &quot;inaccurate&quot;.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>14</td>
<td>Major</td>
<td>Maximum liability amount.</td>
<td>SPL SPG</td>
<td>Should be incorporated into the scheme - option b.</td>
</tr>
<tr>
<td>15</td>
<td>Minor</td>
<td>Annex 5 - SPL API specification - Section 5.5.3 Responsibilities of the IRP: clarify context for not storing of an IBAN.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>16</td>
<td>Minor</td>
<td>Annex 5 - SPL API specification - Section 5.5.1 Components and Interfaces for interoperability: update figure 1'High Level Functional Model for the SEPA Proxy Lookup’ - remove numbers as well as block &quot;payment system&quot;.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>17</td>
<td>Minor</td>
<td>Section 2.12 Applicable legislation: clarification in relation to data protection regulation.</td>
<td>SPL SPG</td>
<td>Approved - See list of minor changes in section 5.</td>
</tr>
<tr>
<td>18</td>
<td>Major</td>
<td>Responding Registry Provider (RRP) fees.</td>
<td>SPL SPG</td>
<td>Should be incorporated into the scheme - option b.</td>
</tr>
</tbody>
</table>
4 Detailed Analysis of Major Change Requests to the SPL scheme Rulebook v1.0

4.1 # 1: Email address to be included as an additional alias

4.1.1 Description

This change request was provided by equensWorldline.

It proposes to include the email address as an additional alias to the IBAN. The format to be used should be “local-part@ domain-part”.

The email address is seen by the submitter as a more stable alias (with less frequent changes) compared to a mobile telephone number. Furthermore, the submitter notes that some providers have experiences in some fraud patterns related to the usage of prepaid mobile numbers and that it is difficult to check if a given mobile number is prepaid or post-paid.

4.1.2 SPL SPG analysis and recommendation

The SPL SPG suggests incorporating the change request into the scheme as an optional feature in the next version (v2.0) of the SPL scheme rulebook (option c).

4.1.3 Rulebook impact

If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.2 # 2: Increase scope to merchant payments (payments at POI)

4.2.1 Description
This change request was provided by equensWorldline.

The SPL scheme is currently limited to person-to-person payments between mobile payment-based schemes within the SEPA geographic area. This change request proposes to extend the scope to merchants’ payments at the point of interaction (POI).

In this use case the consumer is registered at one local payment service provider (PSP) and wants to pay a merchant in another country, who is integrated with another PSP. The merchant would create a QR code including a payment token/link. The consumer would scan this QR code and the consumer’s PSP would request the SPL service with this payment token/link to send it to the right merchant PSP. Each merchant PSP checks if the payment token/link belongs to them and if so, to send back the necessary payment data (merchant IBAN, name, amount and Transaction ID). This data will be used by the consumer’s PSP to initiate the payment.

Optionally the QR code could already contain the SPL participation ID for the merchant’s PSP. In this case the SPL service would not ask all attached merchant PSPs but could route the payment token/link to the right merchant PSP.

This new use case would extend the list of aliases with a payment token/link.

4.2.2 SPL SPG analysis and recommendation
The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (option e).

The SPL SPG does not see the need to use the SPL service in such a scenario. Moreover, there are other workstreams currently ongoing at European level that are focusing on this specific use case.

4.2.3 Rulebook impact
If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.3 # 3: Notifications

4.3.1 Description

This change request was provided by equensWorldline. It proposes that the following information would be exchanged via the SPL service:

- “Credit transfer initiated”: Message sent from the payer’s P2P provider to the payee’s P2P provider just after the related credit transfer has been initiated by the payer’s bank.
- “Money received”: Message sent from the payee’s P2P provider to the payer’s P2P provider just after the money has been received by the payee’s bank.

The submitter is of the view that in particular for a non-instant SEPA Credit Transfer (SCT) this information could be essential for the success of such a cross-border service.

4.3.2 SPL SPG analysis and recommendation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (option e).

The SPL SPG is of the view that it is out of scope of the SPL scheme which focuses on look-ups and not payments.

4.3.3 Rulebook impact

If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.4 # 4: Allow scheme participants from outside Europe

4.4.1 Description

This change request was made by equensWorldline.

It proposes to extend the eligibility criteria that are currently defined in section 2.1 of the SPL scheme rulebook, in order to allow scheme participants from outside Europe.

Underlying use cases include guest worker and family related transfers (e.g. kids studying outside of Europe).

The impact of the use case of remittance payments from Europe to the “rest of the world” is very high. There are already now many transactions with high amounts.

There is also a need for an alias lookup service for these non-European transactions.

The submitter is of the view that it would be a very attractive extension for the European P2P providers to offer such a service also for non-European transactions.

4.4.2 SPL SPG analysis and recommendation

The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook as it is not considered fit for the SEPA geographic area (option d).

The scope of the SPL scheme focuses on the SEPA geographic area (i.e. SEPA countries listed in the EPC List of SEPA Scheme Countries (document EPC409-093, as amended from time to time).

4.4.3 Rulebook impact

If this change request is supported, this will only impact the rulebook.

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3 https://www.europeanpaymentscouncil.eu/document-library/other/epc-list-sepa-scheme-countries
4.5 # 6: Payment requests

4.5.1 Description
This change request was made by equensWorldline.

It proposes to extend the scope of the SPL scheme to accommodate payment requests by the payee in case the payer does not know the amount or has simply forgotten.

In this scenario, the P2P provider of the payee would send a request to the SPL service containing the mobile number (more generic – alias) of the payer together with the payment data (payee IBAN, payee name, amount, payment purpose/text).

The SPL service would first retrieve the appropriate payer’s P2P provider and then transfer the payment data to that provider. The payer’s P2P provider can subsequently initiate the credit transfer by using the transferred payment data.

The submitter is of the view that this extension would fully fit into the initial SPL scheme purpose to support the retrieval of all necessary information between payer and payee to execute a credit transfer. The main advantage of such an approach would be that the payment data would not be exchanged using an unsafe communication channel such as mail or a messenger app.

4.5.2 SPL SPG analysis and recommendation
The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook change request (option e).

The SPL SPG does not see the need to use the SPL service in such a scenario. Moreover, there is a Request to Pay workstream currently ongoing within the EPC that is focusing on this specific use case.

4.5.3 Rulebook impact
If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.6 # 7: Support customer onboarding

4.6.1 Description

This change request was made by equensWorldline. It proposes to offer providers the possibility to use the SPL service - in the onboarding phase of a new client - for checking the (mobile) phone book in order to be able to detect whether certain contacts are also registered at the same provider. New subscribers will immediately see which friends and family members are covered by the same network.

This use case can be implemented via a new API call that will be similar to the existing lookup request but only returns a YES/NO answer for the given mobile number.

This approach would support the onboarding of new customers and would prevent the database “harvesting” (get all user data) from other providers.

For performance reasons there also should be a request for a set of mobile numbers.

4.6.2 SPL SPG analysis and recommendation

The SPL SPG suggests incorporating the change request into the scheme as an optional feature in the next version (v2.0) of the SPL scheme rulebook (option c).

4.6.3 Rulebook impact

If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.7 # 8: Disclosure information by Initiating Registry Provider (IRP) to its customers

4.7.1 Description
This change request was provided by Latvijas Banka.

It suggests changing the current rule that stipulates that “the initiating registry provider (IRP) that is receiving information from an SPL enquiry is under no obligation to disclose all of that information to its customers” into “the initiating registry provider (IRP) that is receiving information from an SPL enquiry is obliged to disclose all of that information to its customers” (section 2.5.1 Obligations of an Initiating Registry Provider).

In addition, it is proposed that this change shall also be reflected in section 5.7.3 List of Data Elements for the SPL Response (Annex V), where Name Beneficiary (AT – 12) shall be included if the beneficiary has given consent to keep the data in the SPL and share it with the payer.

The submitter is of the view that if the beneficiary explicitly consents to the sharing of its name to the SPL service and (logically) to the payer, it shall not be possible for the responding registry provider (RRP) and IRP to overrule this decision.

4.7.2 SPL SPG analysis and recommendation
The SPL SPG recommends not taking forward the change request in the next version (v2.0) of the SPL scheme rulebook (option e).

The SPL SPG has however submitted an alternative change request related to the above (see section 5, item #12).

4.7.3 Rulebook impact
If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.8 # 9: Additional end-to-end data security/integrity requirement

4.8.1 Description

This change request was provided by the Polish Bank Association. It proposes to require additional end-to-end data security/integrity (in addition to Transport Layer Security (TLS)), based on signatures within JavaScript Object Notation (JSON) message (e.g. JSON Web Signature).

The current data security model of the SPL communication is based on TLS, for both confidentiality and integrity. Since TLS is usually terminated in load balancers using TLS off-load, the traffic sent then within the party’s datacentre to/from application servers consuming/issuing the JSON messages is not covered with end-to-end security. They however may be secured with local security encryption/signatures between load balancers and application servers.

Point-to-point security, as opposed to end-to-end, increases the risk of data manipulation, which could result in fraudulent transactions. The strongest threat is the possibility to replace the genuine IBAN with a fraudster’s one, in any of the connecting points, between the point-to-point security domains, resulting in the money transfer directed to the fraudster’s account.

Since the integrity of IBAN is crucial for the SPL service, the submitter is of the opinion that a single layer of security (TLS) is not enough.

4.8.2 SPL SPG analysis and recommendation

The SPL SPG suggests incorporating the change request into the next version (v2.0) of the SPL scheme rulebook (option b).

4.8.3 Rulebook impact

If this change request is supported, this will impact the API specification detailed in Annex V of the SPL scheme rulebook.
4.9 # 10: Extending proxies & revisit/update participants eligibility requirements

4.9.1 Description

This change request was made by MasterCard.

It proposes the following two changes:

- Consider extending the nature of proxies to incorporate new ones beyond the mobile number. This potentiality is already contemplated in the rulebook (section 1.1.). The request is to develop a work-plan/calendar to add a set of new, additional proxy types, account identifiers and use cases.

- Along the same lines, in conjunction with the above, revisit and update participants’ eligibility requirements in order to enlarge the attractiveness of the SPL scheme to all/new potential innovation/technologies/use-cases.

4.9.2 SPL SPG analysis and recommendation

The SPL SPG is of the view that this change request is already provided for in the scheme, and that hence no further action is necessary (option a).

Indeed, in section 1.1 of the SPL scheme rulebook it is already stipulated that “It is envisaged that the Scheme will evolve over time to support additional proxy types, account identifiers and use cases”. Also, see major change request #1 (section 4.1).

The SPL SPG is however interested to learn from the market what other proxy types, account identifiers and use cases would be required in order to enhance the attractiveness of the SPL scheme.

4.9.3 Rulebook impact

If this change request is supported, this will impact the rulebook as well as the API specification detailed in Annex V of the SPL scheme rulebook.
4.10 # 14: Maximum liability amount

4.10.1 Description
This change request was provided by the SPL SPG.
In section 2.6.2 ‘Limits on liability’ of the SPL scheme rulebook it is noted that” “The maximum amount which may be claimed in respect of a Loss is [Tbd]”.
This change request proposes to stipulate that “The maximum amount which may be claimed in respect of a loss is the fee paid to the responding registry provider (RRP) for the provision of the data.”

4.10.2 SPL SPG analysis and recommendation
The SPL SPG suggests incorporating the change request into the scheme in the next version (v2.0) of the SPL scheme rulebook (option b).

4.10.3 Rulebook impact
If this change request is supported, this will only impact the rulebook.
4.11 # 18: Responding Registry Provider (RRP) fees

4.11.1 Description

This change request was provided by the SPL SPG.

It proposes to include the following stipulation in section 2.3 “Becoming a Participant” to clarify the possibility for a responding registry provider to charge a fee:

A Participant in its role of RRP may decide to charge a fee in exchange of services provided to and received by the initiating registry provider (IRP). Fees should be clearly justifiable and established in a non-discriminatory and transparent way, that does not raise barriers to enter the scheme or exclude actual or potential competitors. Furthermore, fees should under no circumstances go beyond the objective of achieving efficiencies related to the scheme nor interfere with the actual payment, which remains outside the scope of the scheme.

4.11.2 SPL SPG analysis and recommendation

The SPL SPG suggests incorporating the change request into the scheme in the next version (v2.0) of the SPL scheme rulebook (option b).

4.11.3 Rulebook impact

If this change request is supported, this will only impact the rulebook.
### 5 Detailed Analysis of Minor Changes to the SPL scheme Rulebook v1.0

The SPL SPG recommends supporting the following minor change requests:

<table>
<thead>
<tr>
<th>CR N°</th>
<th>Section</th>
<th>Description</th>
<th>Reason for change</th>
<th>Type of Change</th>
</tr>
</thead>
</table>
| #5    | Annex V, Section 5.7.2 | As stated in section 1.3 ‘Application to SEPA’, the SPL scheme is applicable in the countries listed in the EPC List of SEPA Scheme Countries, as amended from time to time (the “SEPA geographic area”).

The SPL scheme rulebook is currency agnostic.

In Annex V, Section 5.7.2 ‘List of data elements for the SPL request’: element ‘Transaction Amount’ is described as “The transaction amount in Euros” (as per the Mobile P2P Interoperability Framework - Implementation Guidelines § 3.3.1.). This section will be updated to remove the limitation to euro.

Also see #Change request 5 “Support non-EUR currencies for the amount parameter” from equensWorldline. | Ensure consistency between the rulebook and the API specification in Annex V. | CHAN |
| #11   | Section 2.1 | Update text as follows (see bold text):

“is a legal entity representing and, directly *(e.g. PSP association)* or indirectly *(e.g. association of PSP associations, entity owned by a PSP association)*, having as members PSPs, and being established in a country or territory included within the SEPA geographic area” | Clarify difference between "directly" and "indirectly." | CLAR |
| #12   | Section 2.5.1 | Update text as follows (see bold text):

“It should be noted that the IRP that is receiving information from an SPL enquiry **is under no obligation to may** disclose all of that information to its customers.” | Additional clarification to accommodate a scenario whereby the initiating registry provider (IRP) cannot disclose the information | CLAR |
<table>
<thead>
<tr>
<th>#</th>
<th>Chapter/Section</th>
<th>Update text as follows (see bold text)</th>
<th>Further clarification.</th>
<th>CLAR</th>
</tr>
</thead>
<tbody>
<tr>
<td>#13</td>
<td>Chapter 2.5.2</td>
<td>Update text as follows (see bold text) in replacement of the word “inaccurate”: “It should be noted that the RRP will be liable in case the response does not reflect the content of the latest valid version of the RRP’s database corresponding with the request of the IRP, and results for example in a response to the wrong request or the provision of a name that does not match the IBAN.”</td>
<td>Further clarification.</td>
<td>CLAR</td>
</tr>
<tr>
<td>#15</td>
<td>Annex 5 – Section 5.5.3</td>
<td>Update text as follows (see bold text): “• Not store the IBAN of the beneficiary of the payment for any other purpose than the corresponding payment or dispute resolution;”</td>
<td>Further clarification.</td>
<td>CLAR</td>
</tr>
<tr>
<td>#16</td>
<td>Annex 5 – Section 5.5.1</td>
<td>Update figure 1 ‘High Level Functional Model for the SEPA Proxy Lookup’: remove numbers as well as block &quot;payment system&quot;.</td>
<td>Update of figure 1.</td>
<td>CHAN</td>
</tr>
<tr>
<td>#17</td>
<td>Section 2.12</td>
<td>Update text as follows (see bold text): “Further, each Participant (whether or not subject to the GDPR) shall refrain, to the extent reasonably possible, from exercising any rights accorded to it under its national law vis-à-vis other Participants and vis-à-vis its Customers that either conflict or that could potentially conflict with the relevant provisions of the applicable data protection regulation, notably GDPR.”</td>
<td>Further clarification.</td>
<td>CLAR</td>
</tr>
</tbody>
</table>

### 6 Next steps

The contributors to this public consultation are invited to inform whether they support or not each of the change requests and/or the related SPL SPG recommendation via response template EPC104-19 by **26 August 2019 (19h00 CEST)**. Comments may also be provided.
The SPL SPG shall collect and analyse the support for each change request and the comments received from all the contributors and shall develop its change proposals based on the comments received from the public consultation.

The SPL SPG will consolidate the change proposals, along with each change request and the related non-confidential comments received from the contributors during the public consultation, in the Change Proposal Submission Document which will be submitted to the EPC Board for decision-making purposes.

The Change Proposal Submission Document shall be published on the EPC website along with the decision of the Board on each change proposal.

Approved change requests will be incorporated into the version 2.0 of the SPL scheme rulebook which is expected to be published around April or May 2020.
• Annex 1 – List of original Change Request documents
## TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME

*Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business*

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<thead>
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<td><strong>Contact details:</strong></td>
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<td><strong>Your reference:</strong></td>
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<tr>
<td><strong>Scheme and document and version number:</strong></td>
</tr>
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<td><strong>Request Date:</strong></td>
</tr>
</tbody>
</table>
| **For information:** | This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook [https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook](https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook)
1 Change Request Details

1.1 Description of the change request:
Currently the SPL service only supports mobile numbers as possible alias. Please extend the list of potential aliases by including the alias email address. The format to be used: "local-part@domain-part".

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):
Extension.

1.3 Rationale for the change request:
The email address seems to be a more stable alias of a consumer (with less frequent changes) than the mobile number (feedback from some meetings with providers).
Furthermore, some providers have experiences in some fraud pattern related to the usage of prepaid mobile numbers. It is difficult to check if a given mobile number is prepaid or post-paid.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):
Yes. In some paragraphs (like chapter 1.1 and 5) it has been mentioned.

1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):
Yes. Currently the SPL API specification limits the aliases to mobile number (MSISDN).

1.6 Suggested launch date (if any):
As soon as possible.
1.7 Additional information

Technical implementation is quite simple. Just introduce a new alias type and remove the limitation.

For an email address alias there will be no longer the possibility to reduce the number of requests to a subset of attached providers (like for mobile number based on the country code).
**TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME**

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu **by 31 March 2019 close of business**

<table>
<thead>
<tr>
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</table>

| Name of contributor: | |
| Organisation: | equensWorldline |
| Address: | Pascalstraße 19, 52076 Aachen, Germany |
| Contact details: | |
| Your reference: | Merchant Payments (payments at POI) |
| **Scheme and document and version number:** | EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook |
| Request Date: | 22.03.2019 |

**For information:** This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook' [https://www.europaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook](https://www.europaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook)
1 Change Request Details

1.1 Description of the change request:

Currently, the SPL service is only used for person-to-person payments. One important extension would be the extension of the SPL service to B2C.

The scenario discussed here is where the consumer is registered (bank data) at one local PSP and wants to pay at a merchant, who is integrated with another PSP (e.g. a tourist is shopping at merchants in another country during vacations) (see also 1.7).

The merchant would create a QR code including a payment token/link. The consumer would scan this QR code and the consumer PSP would request the SPL with this payment token/link to send it to the right merchant PSP. Each merchant PSP checks if the payment token/link belongs to them and if yes to send back the necessary payment data (merchant IBAN, name, amount and TX ID). This data will be used by the consumer PSP to initiate the payment.

Optionally the QR code could already contain the SPL participation ID for the merchant PSP. In this case the SPL would not ask all attached merchant PSP but could route the payment token/link to the right merchant PSP.

This new use case would extend the list of aliases with payment token/link.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension.

1.3 Rationale for the change request:

This very important use case would create a real business case for the participating providers because only the B2C use case is connected with fees for the provider – the P2P use case is almost everywhere without any fees.

Technical interoperability plays an important role for this use case.

The concept implements a kind of payment token routing (token as a new type of alias) that keeps the local services almost untouched instead of creating a new technical standard that would cause major changes to all existing local services.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service and therefore the SPL API specification has to be extended.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

The scenario discussed here is where the consumer is registered (bank data) at one local PSP wants to pay at a merchant integrated with another PSP (e.g. a tourist is shopping at merchants in another country during vacations). Consumer and merchant have different banks and different payment providers.
Be aware that the second interaction with the SPL service is only necessary for non-instant credit transfers. For SCT Inst the confirmation delivery can be done via the Payer bank.
## TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business

**CR#3**

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<tr>
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**For information:**

This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook

1 Change Request Details

1.1 Description of the change request:

For the SPL scenario the payee does not get the information about the initiated payment from the payee and the payer does not get the information about the received money from the payee.

Such valuable information could be exchanged using SPL. After the successful SPL request that delivers the IBAN and beneficiary name, both involved P2P provider have all the necessary information (mainly the SPL participant ID) to exchange these messages:

“Credit transfer initiated” – Message send from the payer P2P provider to the payee P2P provider just after credit transfer has been initiated at the payer bank.

“Money received” – Message send from the payee P2P provider to the payer P2P provider just after the money has been received at the payee bank.

Especially for a non-instant SCT this information could be essential for the success of such a cross-country/cross-community service.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension.

1.3 Rationale for the change request:

The success of the existing P2P services is linked to the “real-time” information of all participants about all payment transactions (payer and payee).

For the SPL scenario the payee does not get the information about the initiated payment from the payee and the payer does not get the information about the received money from the payee.

Such information could be exchanged using SPL.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service and therefore the SPL API specification has to be extended.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

Potentially, it could be possible to check within the Berlin Group standard if they have already defined such messages.
**TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME**

**Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business**

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<tr>
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<td>This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document ‘EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook’ <a href="https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook">https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook</a></td>
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</table>
1 Change Request Details

1.1 Description of the change request:

In the SPL rulebook the participation is limited to licenses of PSP and their technical providers (see chapter 2.1).
The service would be also very interesting for credit transfer transactions that will be sent outside Europe.
Underlying use cases are Guest Worker scenario and Family Transfers (e.g. kids having a study semester outside Europe).
Please check if the SPL service could be extended e.g. for non-European bank.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension.

1.3 Rationale for the change request:

The impact of the use case Money Transfer (Remittance) from Europe to the “Rest of the World” is very high. There are already now many transactions with high amounts.
For these non-European transactions the need for such an Alias Service is the same.
It would be a very attractive extension for the European P2P providers to offer such a service also for non-European transactions.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. Chapter 2.1 - Eligibility for participation.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

No.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

https://moneytransfercomparison.com/remittance-market-overview
**TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME**

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu **by 31 March 2019 close of business**

**CR#5 (minor change)**

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<td>Support non EUR currencies for the amount parameter</td>
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<td>This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook <a href="https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook">https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook</a></td>
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1 Change Request Details

1.1 Description of the change request:
Currently the SPL service only supports EUR as currency for the amount that can be sent as part of the request.
Currently the SPL API specification limits the currency to EUR (chapter 5.7.2 in the SPL specification – annex 5: Transaction Amount (AT – 04)).
AmountType offers the possibility to define the currency but is limited to EUR in the Berlin Group Specification - Mobile P2P Interoperability Framework - Implementation Guidelines § 3.3.1.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):
Replacement.

1.3 Rationale for the change request:
There are providers from countries that do not have EUR as currency. For example in the Nordics there are many interactions of their users even between providers that both do not have EUR (e.g. from Denmark to Sweden).
Here the limitation to EUR would make no sense because neither the sender nor the receiver would have EUR.
Due to the fact that no credit transfer is executed within the SPL service the currency of the (optional) sent amount plays no technical role.
This issue was detected during the integration tests executed with the Polish provider.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):
No. Only in the API specification.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes. Currently the SPL API specification limits the currency to EUR (chapter 5.7.2 in the SPL specification – annex 5: Transaction Amount (AT – 04)). AmountType offers the possibility to define the currency but is limited to EUR in the Berlin Group Specification - Mobile P2P Interoperability Framework - Implementation Guidelines in § 3.3.1.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

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<td>AT-04</td>
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<td>Amount: This amount might be used for risk management issues in a pre-validation.</td>
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<td>Currency: EUR Other currencies than Euro are not allowed.</td>
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### TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME

**Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business**

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<td><strong>Organisation:</strong> equensWorldline</td>
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<tr>
<td><strong>Address:</strong> Pascalstraße 19, 52076 Aachen, Germany</td>
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<tr>
<td><strong>Contact details:</strong></td>
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<tr>
<td><strong>Your reference:</strong> Payment Request</td>
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<td><strong>Scheme and document and version number:</strong> EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook</td>
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<tr>
<td><strong>Request Date:</strong> 22.03.2019</td>
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</table>
| **For information:** This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook
1 Change Request Details

1.1 Description of the change request:

Currently the SPL is used by the payer to get the payment data of the payee based on the usage of an alias (mobile number).

But in many situations the payment will be “initiated/requested” by the payee because the payer does not know the amount or has simply forgotten.

So the P2P provider of the payee would send a request to the SPL containing the mobile number (more generic – alias) of the payer together with the payment data (payee IBAN, payee name, amount, payment purpose/text).

The SPL would retrieve the appropriate payer P2P provider and transfer the payment data to the payer P2P provider. The payer P2P provider can now initiate the credit transfer by using the transferred payment data.

As an alternative this request from the SPL into the group of attached P2P providers could be even done in two steps – first to identify the correct payer P2P provider and then in a second step to transfer the payment data to this P2P provider.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension.

1.3 Rationale for the change request:

In many situations the payment will be “initiated/requested” by the payee because the payer does not know the amount or has simply forgotten.

The situation would be quite similar because the payee could not know the P2P provider of the payer and would not want to send the payment data using unsecure messaging channels (like mail or messenger).

So this extension would fully fit into the initial SPL purpose to support the retrieval of all necessary information between payer and payee to execute a credit transfer.

Main advantage of such an approach would be that the payment data would not be exchanged using an unsafe communication channel such as mail or messenger.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service and therefore the SPL API specification has to be extended.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

After the reception of the Payment Request the Payer P2P provider would inform the payer about the receipt and could ask if the payment should be executed because all information are already available for such a credit transfer.
## TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business

CR#7

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<td>equensWorldline</td>
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<tr>
<td>Address:</td>
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</tr>
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<td>Contact details:</td>
<td></td>
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<tr>
<td>Your reference:</td>
<td>Support Customer Onboarding</td>
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<td>Scheme and document and version number:</td>
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</table>
1 Change Request Details

1.1 Description of the change request:

Most existing provider offers to their new customers during the “on boarding process” the possibility to check their mobile address book for people that are also registered at the same provider. So they know to whom they could e.g. send or receive money. In the interoperability scenario supported by SPL this use case is more difficult to be realized.

This use case can be implemented if we have a new API call available that will be similar to the existing request but only returns a YES/NO answer for the given mobile number.

Inside SPL the request will be handled similar to the existing one (maybe we would not request the input of additional information like amount etc.). The answer would be just the YES/NO – no IBAN etc. transferred.

This approach would support the on boarding of new customers and would prevent the database “harvesting” (get all user data) from other providers.

For performance reasons there also should be a request for a set of mobile numbers. The set request would be transferred to the RRPs as total by the SPL (not split into single request for single numbers).

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension.

1.3 Rationale for the change request:

To attract new customers it would be nice to support the on boarding process by such functionality. So the new subscribers immediately see who from their friends are in the network.

This approach prevents to read the full database from another provider.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service.
1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes. It would extend the functional scope of the service and therefore the SPL API specification has to be extended.

1.6 Suggested launch date (if any):

As soon as possible.

1.7 Additional information

Sending a set of numbers would include that SPL would “merge” the incoming answers – e.g. provider A has Person 1 – 5 as customers and provider B has Person 3 – 10 as customers. The response would be SPL supports person 1–10.
**TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME**

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu  
*by 31 March 2019 close of business*

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<tr>
<td><strong>Request Date:</strong></td>
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<td><strong>For information:</strong></td>
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1 Change Request Details

1.1 Description of the change request:

We invite to amend the rule *IRP that is receiving information from an SPL enquiry is under no obligation to disclose all of that information to its customers.* (2.5.1 Obligations of an Initiating Registry Provider)

This shall be also reflected in the 5.7.3 List of Data Elements for the SPL Response, where Name Beneficiary (AT-12) shall be included if the beneficiary has given consent to keep the data in the SPL and share it with the payer.

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Replacement

1.3 Rationale for the change request:

If the Beneficiary explicitly consents sharing of its name to the SPL and (logically) to the Payer, it shall not be possible to RRP and IRP to redecide either to include that information in the Response message and to the payer accordingly or not.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes, the change request would deliver more harmonisation and clarity as well as more confidence for the payer, especially in case of making large value payments.

1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):


1.6 Suggested launch date (if any):


1.7 Additional information
**TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME**

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu by 31 March 2019 close of business

**CR#9**

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<td>Herberta 8, 00-380 Warsaw, Poland</td>
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<tr>
<td>Contact details:</td>
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<td>Your reference:</td>
<td>SPL SPG member</td>
</tr>
<tr>
<td>Scheme and document and version number:</td>
<td>EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook</td>
</tr>
<tr>
<td>Request Date:</td>
<td>27/03/2019</td>
</tr>
<tr>
<td>For information:</td>
<td>This template is provided by EPC to allow any person or organisation to submit a change request for making a change to the SPL Scheme in accordance with the rules set out in the document 'EPC250-18 v1.0 SEPA Proxy Lookup Scheme Rulebook <a href="https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook">https://www.europeanpaymentscouncil.eu/document-library/rulebooks/sepa-proxy-lookup-spl-scheme-rulebook</a></td>
</tr>
</tbody>
</table>
1 Change Request Details

1.1 Description of the change request:

Additional end-to-end data security/integrity requirement, beside/above TLS, based on signatures within JSON message (eg. JSON Web Signature)

1.2 The nature of the change request (Deletion / Replacement / Addition / Extension):

Addition

1.3 Rationale for the change request:

Current data security model of the SPL communication is based on TLS, for both: confidentiality and integrity. Since TLS is usually terminated in load balancers using TLS off-load, the traffic sent then within party’s datacentre to/from application servers consuming/issuing the JSON messages is not covered with end-to-end security, however may be secured with local security encryption/signature between load balancers and application servers. Instead of end-to-end security, we can have a chain of point-to-point security domains, which increases the risk of data manipulation, which could directly increase a financial risk of having fraudulent transactions. The strongest threat is the possibility to replace the genuine IBAN with a fraudster’s one, in any of the connecting points, between the point-to-point security domains, resulting in the money transfer directed to the fraudster’s account.

Since the integrity of IBAN is crucial for SPL service, we are of the opinion that single layer of security (TLS) is not enough.

1.4 Impact on the SPL Scheme (Yes/No + explanation concrete impact):

No

1.5 Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes, changes in chapter 5.9.4

1.6 Suggested launch date (if any):

As soon as possible

1.7 Additional information
### TEMPLATE FOR PROPOSING A CHANGE REQUEST TO THE SEPA PROXY LOOKUP (SPL) SCHEME

Please submit change requests via e-mail to SPLchangerequest@epc-cep.eu

*by 31 March 2019 close of business*

**CR#10**

<table>
<thead>
<tr>
<th>Name of contributor:</th>
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<tbody>
<tr>
<td>Organisation:</td>
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<td>298A Ch de Tervuren – B-1420 Waterloo</td>
</tr>
<tr>
<td>Contact details:</td>
<td></td>
</tr>
<tr>
<td>Your reference:</td>
<td>SPL Change Requests March 2019</td>
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<tr>
<td>Scheme and document and version number:</td>
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<td>For information:</td>
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</tr>
</tbody>
</table>
1  Change Request Details

1.1  Description of the change request:

Two changes are being requested:

(1)  Consider extending the nature of proxies to incorporate new ones beyond the mobile number. This potentiality is already contemplated in the rulebook (section 1.1.). The request is to set a work-plan/calendar to add a set of new, additional proxy types, account identifiers and use cases.

(2)  Along the same lines, in conjunction with the above, revisit and update participants’ eligibility requirements in order to enlarge the attractiveness of the SPL to all/new potential innovation/technologies/use-cases.

1.2  The nature of the change request (Deletion / Replacement / Addition / Extension):

Extension

1.3  Rationale for the change request:

Both for (1) and (2) above, under the established guiding principle of innovation (according to section 3.2.1.): Update in view of current eco-system, potential new use-cases, maximizing openness and inclusiveness of the SPL, widening its outreach and its appeal to users.

1.4  Impact on the SPL Scheme (Yes/No + explanation concrete impact):

Yes. Incremental changes. May impact governance, rules.

1.5  Impact on the SPL API Specification (Yes/No + explanation concrete impact):

Yes, updates to handle new proxy types / use cases.

1.6  Suggested launch date (if any):

1st April 2020.

1.7  Additional information