## Approved

Request for public consultation’s input on a possible additional functionality of the SEPA Payment Account Access (SPAA) Scheme’s Rulebook

1. Background and objectives

In addition to the Premium features (DS-PXX) listed in section 2 of the SPAA Scheme Rulebook (document EPC012-22) currently out for public consultation, the SPAA Multi-Stakeholder Group (MSG) is also considering a Premium feature (i.e., Dataset) that would allow Asset Brokers to request a payment with transaction fees not borne by the Payer.

The purpose of such Premium feature is to make the SPAA Scheme an attractive option for Asset Owners (Payers) and to enable Asset Users (merchants) to realise the benefits provided by the SPAA Scheme, on top of the benefits inherent to e.g., instant payments. If the Payer would have to bear transaction fees per payment, the usage of the Scheme would be relatively unattractive, compared to other payment options with low or no transaction fees for the Payer.

As part of the current public consultation, the market is invited to share its views on this potential functionality herewith described. It is to be noted that this document will be published simultaneously with the draft version of the SPAA Scheme Rulebook.

1. Functionality description

The proposed Dataset (see Annex I) would describe the minimum API attribute requirements related to a request for not applying transaction fees for the Payer in relation to a payment. An Asset Broker would request an Asset Holder - via an API - to not charge the Payer for the underlying payment transaction (e.g., a(n instant) credit transfer).

The Payer’s charge would instead be ‘absorbed’ by the Asset Broker, which, depending on the use case, could be the Payee’s Account Servicing Payment Service Provider (ASPSP) or not. The Asset Broker could decide to recoup the charge as part of the charges applied to its customers (e.g., merchants).

The functionality would be applicable to One-off payments, One-off payments to multiple counterparties, Futured dated payments, Dynamic future dated payments, Recurring payments, Dynamic recurring payments, and Personal Finance Management (PFM) automated transfers - in particular when settled as instant payments. Each aforementioned transactional asset is described in the SPAA Scheme Rulebook.

1. SPAA MSG members’ considerations

In evaluating the functionality, the members of the SPAA MSG formulated the following considerations:

1. On one side, from a business perspective the functionality is considered a critical feature for Asset Brokers, in view of the possibility that Asset Holders could charge transaction fees. The functionality would allow the SPAA Scheme to successfully facilitate the relevant underlying payment use cases for the customers of these Asset Holders.
2. On the other side, based on a preliminary EPC assessment, it appears that the functionality may need to be further analysed from a legal, operational, technical and commercial point of view, before the Dataset (see Annex I) could possibly be included in the SPAA Scheme Rulebook.
3. Request for input and evaluation

The interested parties are requested to give an exhaustive answer to each of the following questions, to help the EPC make a more thorough evaluation of this possible functionality.

| 1. | Do you agree that for certain use cases e.g. e-commerce or point of sale (POS) payments, a mechanism should be included whereby a transaction fee per payment is not borne by the Payer? |  |
| --- | --- | --- |
| 2. | Do you consider that such functionality should be in the scope of the SPAA scheme? |  |
| 3. | Do you agree that the proposed mechanism (see Annex 1) is appropriate, or would you recommend another mechanism or see a need to complement the proposed one? |  |
| 4. | Do you consider that the implementation of the functionality is in scope of the SPAA scheme? If yes, under what conditions? |  |
| 5. | Do you consider that the implementation of the functionality is legally feasible? If yes, under what conditions? |  |
| 6. | Do you consider that the implementation of the functionality is operationally / technically feasible? If yes, under what conditions? |  |
| 7. | Do you consider that the implementation of the functionality is commercially feasible? If yes, under what conditions? |  |
| 8. | Other? |  |

**Annex I : Open topic: DS-P06 Mechanism to request a payment with transaction fees not borne by the Payer**

| **Identification:** | **DS-P06** |
| --- | --- |
| **Name:** | **Mechanism to request a payment with transaction fees not borne by the Payer** |
| **Description:** | This Dataset describes the minimum API attribute requirements related to the mechanism to request a payment with transaction fees not borne by the Payer. |
| **Attributes contained** | * AT-A023 Request for a payment with transaction fees not borne by the Payer (M) |
| **Rules** | Applicable to the following transactional assets:   * One-off payments * One-off payments to multiple counterparties * Futured dated payments * Dynamic future dated payments * Recurring payments * Dynamic recurring payments * PFM automated transfers |