



SEPA Request-to-Pay (SRTP) Scheme Rulebook

2022 Change Proposal Submission Document Following the 2022 Public Consultation on SRTP Scheme Change Requests

EPC156-22 /Version 1.0 / Date issued: 24 November 2022

SRTP Scheme Rulebook

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Version 1.0

Date issued: 24 November 2022

Public



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Payments Council

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1 Introduction

It is a key objective of the EPC that the SEPA Request-to-Pay (SRTP) scheme is able to develop with an evolving market. To meet the demands of the scheme participants and stakeholders including end-users and Service Providers (SP) communities, the SRTP 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.

The first step in the SRTP scheme change management cycle is the introduction of change requests by any party with a legitimate interest. The change request submission period ended on 25 February 2022.

In consideration of the change requests received, the EPC's RTP Task Force (RTP TF) develops a public consultation document, containing the change requests and the related RTP TF recommendations following a detailed analysis.

All submitted change requests to modify the SRTP scheme rulebook received by the EPC are published through the public consultation document on the EPC website, permitting such a list to be openly viewed by all stakeholders. This public consultation ran from 25 May until 26 August 2022.

Following the termination of the three-month public consultation, the RTP TF collects and analyses the level of support and comments received for each change request, based on which it prepares change proposals.

A change proposal as developed by the RTP TF may bring together more than one change, developed from one or more change requests.

The RTP TF consolidates 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.

The change proposal submission document is then submitted to the EPC Board for decision-making purposes. The Board deliberates on the change proposal submission document from the RTP TF.

Finally, the change proposal submission document is published on the EPC website along with the decision of the Board on each change proposal.

2 Executive summary

This change proposal submission document (EPC156-22) describes that each stage of the 2022 SRTP scheme rulebook change management cycle, from the initiation to the public consultation, has been properly completed in respect of each change request submitted.

The first step in the change management cycle was the submission of change requests to the SRTP scheme by any party with a legitimate interest. The change request submission period ended on



25 February 2022. The EPC received a total of 24 change requests for major changes to be introduced into the SRTP scheme rulebook.

The public consultation on possible modifications to be introduced into the SRTP scheme rulebook ran from 25 May until 26 August 2022. The following documents were published on the EPC website (link:<https://www.europeanpaymentscouncil.eu/document-library/other/public-consultation-sepa-request-pay-scheme-rulebook>):

- SRTP Scheme Rulebook 2022 Change Request Public Consultation Document (EPC074-22).
- Response template SRTP Scheme Rulebook 2022 Change Request Public consultation (EPC075-22).

This Change Proposal Submission Document contains for each change request:

- A description of the change request.
- The RTP TF recommendation provided as input for the public consultation.
- The RTP TF change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
 - Contributor name.
 - Contributor support of the RTP TF recommendation.
 - Contributor comments.
- The Board decision on each RTP TF change proposal.

As a result of the 2022 SRTP scheme rulebook change management process, the rulebook has been updated to include:

- the removal of inter-Service Providers references
- the rationale on how to route the SRTP message to the correct Payer's SRTP Service Provider
- the Payee's enrolment and Payer's activation
- the request for instalment payments
- the redirection of the Payer to the appropriate merchant's web page
- the redirect processes
- the request for payment initiation status
- the reference to a previous SRTP message
- a recommendation about transparency for retail payment end-user
- the alignment of attribute numbers across all EPC rulebooks
- the possibility to send a credit note by an SRTP message
- the update of the Trust & Security Framework

In addition, the minor changes as defined in section 6.3 as well as a number of editorial updates to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos have been included in version 3.0 of the SRTP scheme rulebook.



3 Overview 2022 major change requests and final Board decision

Item	Change request	Final Board decision
1	Removal of interservice providers references	<ul style="list-style-type: none"> - To be incorporated in the next version (v3.0) of the SRTP scheme rulebook. - Not to be included in the next version (v3.0) of the SRTP scheme rulebook. - Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
2	Include the rationale on how to route the RTP message to the correct Payer's RTP SP	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
3	Payee's enrolment and Payer's activation	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
4	Request for instalment payments	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
5	Request for instalment payments	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
6	Request for instalment payments	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
7	Request for instalment payments	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
8	Recurring payments	Is already provided for in the scheme.
9	Redirection of the Payer to the appropriate merchant's web page based on the final status of the RTP response	To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.
10	Redirect clarification/specification and the extension of the use of the SRTP positive response	<ul style="list-style-type: none"> - To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook. - To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.
11	Notification of payment execution	To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.
12	There should be an option for the Payee/Payee's SRTP SP to request for a Payment Initiation Status either within the original RTP message or by a Request for Status Update	To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



Item	Change request	Final Board decision
13	Pre-authorisation or deferred payments	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
14	SCT reference in the SRTP message	To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.
15	Allow the Payer to ask for changes on amount/execution date/method of payment	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
16	Transparency for retail payment end-users	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
17	Alignment of all attribute numbers across all rulebooks	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.
18	Possibility to send a Credit Note by an RTP message	To be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.
19	RTP Mandates and automatic approval of subsequent RTPs	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
20	Payment guarantee with bilateral or multilateral agreements	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
21	Pre-authorisation	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
22	Use of an Alias/Proxy in addition to IBAN as the identifier of the Payee in the RTP message presented to the Payer	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
23	Enable SRTP SPS to utilise the transactional assets that are currently being defined by the SPAA scheme	Not to be included in the next version (v3.0) of the SRTP scheme rulebook.
24	Update of the Trust & Security Framework	To be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



4 Overview of Change Requests submitted for the the 2022 Public Consultation

4.1 Background

This section lists the change requests which were presented for public consultation along with the recommendation given by the RTP TF for 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 participant¹ 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 scheme.

4.2 Summary of change requests and the expressed support following the public consultation

Table 1 below provides an overview of the level of support from the contributors regarding the RTP TF recommendations presented during the public consultation. The list of contributors can be found in Annex I.

The contributors were invited to indicate (in the response template) their support concerning each RTP TF recommendation via providing a “Yes”, “No” or “No Opinion” response. Kindly note that the number of “No Opinion” positions have not been taken into account when determining the level of support for each change request.

Some contributors also provided additional comments which have been listed for each change request under “Public consultation feedback” (section 5).

¹ A participant which has formally adhered to the scheme.



CR#	Change request title	EPC RTP TF recommendation	Count "Yes"	Count "No"	Count "No opinion"	Count No Answer
1	Removal of inter-services provider references.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	14	1	1	3
	Remove the possibility to apply charges to other SRTP scheme participants.	e) The change request cannot be part of the scheme.	12	3	2	2
	Make the APIs freely available commercially to all Service Providers.	e) The change request cannot be part of the scheme.	10	2	4	3
2	Include the rationale on how to route the RTP message to the correct Payer's RTP SP.	e) The change request cannot be part of the scheme.	7	7	2	3
3	Payee's enrolment and Payer's activation.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	12	3	2	2
4	Request for instalment payments.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	14	1	2	2
5	Request for instalment payments.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	15	1	1	2
6	Allow the Payer and the Payer's SRTP Service Provider to initiate a cancellation in case of instalment payments.	e) The change request cannot be part of the scheme.	11	3	2	3
7	Request for instalment payments.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	14	1	2	2
8	Recurring payments.	a) The change request is already provided for in the scheme: no action is necessary for the EPC.	12	2	2	3
9	Redirection of the Payer to the appropriate merchant's web page based on the final status of the RTP response.	c) The change request should be included in the scheme as an optional feature.	15	0	2	2
10	Redirect process.	c) The change request should be included in the scheme as an optional feature.	15	0	2	2
	Request for payment initiation status.	c) The change request should be included in the scheme as an optional feature.	13	0	2	4
11	Notification of payment execution.	c) The change request should be included in the scheme as an optional feature.	11	3	2	3
12	There should be an option for the Payee/Payee's SRTP SP to request for a Payment Initiation Status either within the original RTP message or by a Request for Status Update.	c) The change request should be included in the scheme as an optional feature.	12	2	2	3



CR#	Change request title	EPC RTP TF recommendation	Count "Yes"	Count "No"	Count "No opinion"	Count No Answer
13	Pre-authorisation or deferred payments.	e) The change request cannot be part of the scheme.	12	2	2	3
14	SCT reference in the SRTP message.	c) The change request should be included in the scheme as an optional feature.	10	3	3	3
15	Allow the Payer to ask for changes on amount/execution date/method of payment.	e) The change request cannot be part of the scheme.	13	2	1	3
16	Transparency for retail payment end-users.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	15	0	1	3
17	Alignment of all attribute numbers across all rulebooks.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	15	0	1	3
18	Possibility to send a Credit Note by an RTP message.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	10	3	3	3
19	RTP Mandates and automatically approval of subsequent RTPs.	e) The change request cannot be part of the scheme.	11	2	3	3
20	Payment guarantee.	e) The change request cannot be part of the scheme.	10	3	3	3
21	Pre-authorisation.	e) The change request cannot be part of the scheme.	12	3	1	3
22	Use of an Alias/Proxy in addition to IBAN as the identifier of the Payee in the RTP message presented to the Payer.	a) The change request is already provided for in the scheme: no action is necessary for the EPC.	11	5	1	2
23	Enable SRTP SPs to utilise the transactional assets that are currently being defined by the SPAA scheme .	e) The change request cannot be part of the scheme.	8	3	5	3
24	Update of the Trust & Security Framework.	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	15	0	2	2

Table 1: Summary of change requests and the support expressed during the public consultation

5 Detailed overview of the major change requests

This section provides the following details for each major change request:

- Description of the change request.
- RTP TF recommendation provided as input to the public consultation.
- RTP TF change proposal following the analysis of the public consultation results.
- Overview table containing the following information:
 - Contributor name.
 - Contributor support of the RTP TF recommendation.
 - Contributor comments.



- The Board decision on each RTP TF change proposal.



5.1 # 1: Removal of inter-services provider references

5.1.1 Description

This change request was provided by Answer Pay Limited. It proposes to remove the inter-services provider references and edit sections 2.2.4 and 3.2 to ensure reachability and availability of scheme participants. The following three modifications are suggested:

- a. Remove the specific reference to the Inter-SRTP Service Providers in the rulebook.
- b. Revisit the section 2.2.4 'Charging principles' and remove the possibility to apply charges to other SRTP scheme participants.
- c. Expand section 3.2 to ensure that Service Providers are not purely technically available but that the scheme ensures competitive and equitable access for all. The Service Providers must make the APIs freely available commercially (without bilateral contract or charges) to other Service Providers in order to ensure interoperability without barriers.

5.1.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that:

- a. The specific reference to the Inter-SRTP Service Providers should be removed as the scheme is infrastructure agnostic;
- b. The basis and the level of charges are entirely a matter for individual SRTP scheme participants;
- c. The SRTP scheme participants must at the minimum exchange SRTP messages based on API and have the capability to access the SRTP related API of other SRTP scheme Participants. The SRTP related API are restricted to the onboarded SRTP scheme participants.

Therefore, the RTP TF recommends:

- a. Including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).
- b. Not taking forward the change request - (option e).
- c. Not taking forward the change request - (option e).

5.1.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to:

- a. remove in the next version (v3.0) of the SRTP scheme rulebook the specific reference to the Inter-SRTP Service Providers in section 1.4 'Four corner model' for clarity purposes as the scheme is infrastructure agnostic.
- b. not to incorporate this change request in the next version (v3.0) of the SRTP scheme rulebook given that this matter should be treated outside the scope of the scheme. Only the placeholder for charges attribute is included in the SRTP scheme.
- c. not to incorporate this change request in the next version (v2.0) of the SRTP scheme rulebook given that the APIs are available for the scheme participants only to avoid jeopardising all the protections included in the scheme.

Public consultation feedback:

- Remove the specific reference to the Inter-SRTP Service Providers in the rulebook.



Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Because the SRTP is agnostic of the infrastructures.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	EuroCommerce believe that inter-RTP SP described in the Rulebook are illustrative only and does not preclude any future setup. It is important to illustrate the role of such inter-RTP SP to ensure the reader being aware of the relationship between RTP SP and Inter-RTP SP to provide a performant ecosystem.
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	EACT fully supports the concept that the SRTP Scheme should be infrastructure agnostic
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	



Contributor	Support	Contributor comments
Gini GmbH	Yes	

- Revisit the section 2.2.4 'Charging principles' and remove the possibility to apply charges to other SRTP scheme participants.

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Swedish Bankers' Association	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Freedom to trade. It could be recommended that each participant displays "public prices". The usefulness of the attribute AT 89 is to allow the possible definition of a business model (to be defined at this stage).
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No opinion	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	An interoperability framework is needed to address the concern about potential market participants limiting the availability of the SRTP messaging service. Furthermore EPC SRTP scheme should support full transparency of fees information end-to-end that are charged by any party (participants and their customers). The scheme should provide the technical means for transparency of fees.
Vseobecna uverova banka (VUB)	No	In our opinion application of charges has to be included in the schema for unambiguous identification for all schema participants.



Contributor	Support	Contributor comments
European Association of Corporate Treasurers	Yes	EACT supports the concept that charges among participants should be managed outside the SRTP Scheme.
EBA CLEARING	Yes	EBA CLEARING agrees not to support the CR, we would like to add however that on a general level take up of the scheme in a broad sense might be facilitated if there was an arrangement foreseen with commercial incentives for all actors based on the principle of fair distribution of value and risk. There are some similarities in this respect between Request to Pay with work done in the SEPA API Access Scheme.
Italian Banking Association	Yes	
Budget Insight	No	
Febelfin	No opinion	
Gini GmbH	Yes	

- Expand section 3.2 to ensure that Service Providers are not purely technically available but that the scheme ensures competitive and equitable access for all. The Service Providers must make the APIs freely available commercially (without bilateral contract or charges) to other Service Providers in order to ensure interoperability without barriers.

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This is a voluntary Scheme (not a regulation). SRTP does not include at this stage commercial rules (i.e., business model). In addition, the use of the API requires to be a participant of the scheme.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	



Contributor	Support	Contributor comments
French National Payments Committee (CNPS)	No opinion	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No opinion	
European Association of Corporate Treasurers	No opinion	
Italian Banking Association	Yes	
Budget Insight	No	This is already the case with the PSD2 APIs and has been a key point in promoting their use.
Febelfin	No opinion	
Gini GmbH	No	<p>We agree with the RTP TF that every participant in the scheme should be able to enter into commercial agreements with any other participant that is relevant to their business. However, it is fundamental for the success of this scheme to guarantee that every enrolled user can reach any other participant of the scheme, even without a commercial agreement.</p> <p>For users who choose to pay with SRTP at an online ecommerce, receiving a negative response due to lack of contract between the parties would be unacceptable. Users don't need to know who their SP is and if they have an agreement with the merchant's one. This type of experience makes users reluctant to try SRTP again.</p> <p>For this reason, the sole membership to the SRTP scheme should oblige each participant to accept a default commercial agreement in the absence of a 1-to-1 agreement. This agreement establishes a standard fee a Payer SP would charge a Payee SP for enabling successful reachability among both.</p> <p>A few recommendations for setting this standard fee:</p> <ol style="list-style-type: none"> 1. It should be priced slightly over the average market fee to



Contributor	Support	Contributor comments
		<p>motivate agreements among participants with high volume exchanged.</p> <p>2. It could consist of a fixed and variable amount based on the total amount paid by the user, with lower and upper limits.</p> <p>3. In addition to a standard fee for an approved SRTP message, establishing a small fee for rejected SRTP (or unresponsive) could be necessary for sustainability reasons and for preventing indiscriminate delivery of SRTP.</p> <p>4. It should charge P2P use cases differently or even waive fees for such use case payment.</p> <p>Furthermore, from an administrative perspective, we believe that the effort for each participant of closing 1-to-1 agreements with all other scheme participants, is too high and will result in insufficient reachability for Payers and Payees.</p>

5.1.4 Board decision

Only the removal of the reference to the Inter-SRTP Service Providers should be included in the next version of the SRTP scheme rulebook (v3.0). The other parts of the change request are not to be included in the next version (v3.0) of the SRTP scheme rulebook.



5.2 # 2: Include the rationale on how to route the RTP message to the correct Payer’s RTP SP

5.2.1 Description

This change request was provided by the Finance Finland/Finnish Banking Community.

It proposes to include the rationale how to route the RTP message to the correct Payer’s RTP Service Provider based on the Payer’s Identifier received from the Payee with the RTP message (DS-01 - RTP by Payee to Payee’s RTP Service Provider).

The current rulebook requires as a mandatory identifier only the Identifier of the Payer (DS-01 RTP by Payee to Payee's RTP Service Provider). If the Payee's Service Provider does not know how to direct the payment request to the correct Payer's Service Provider, there should be guidance on the matter somewhere. The current rulebook does not take a position on this, but in order to make it easier to deploy the scheme, either clarification paper or more clearly inclusion in the rulebook itself is needed.

The routing to a correct Payer’s SRTP Service Provider could be based on Payer’s activation (general or specific consent given by the Payer).

Both centralized and decentralized registries should be supported for look-up of the appropriate Payer’s Service Provider.

5.2.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that an operational registry translating a Payer identifier into an SRTP address can be used. For the time being, this operational registry is not included in the scope of the SRTP scheme.

The RTP TF recommends not taking forward the change request - (option e).

5.2.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme together with the change request CR#3 (Payee’s enrolment and Payer’s activation).

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This is in fact about translating a proxy (phone number, e-mail, etc...) into the "SRTP Address". Such service can be part of an independent offer that can be used before the inter SRTP SP message exchange. Should the Payer's id be significant to find his SRTP SP (beware to the constraints when changing address)? Wouldn't it rather be the role of a Central Directory allowing



Contributor	Support	Contributor comments
		the Payee's SRTP SP to find the reachability address of the Payer (see the Trust & Security Framework presented by the French Community in 2020) ?
Dutch Payments Association	No	Not fully clear what is meant with rationale. Anyway, if the Service Provider of the payee doesn't receive the identifier of payers Service Provider from the payee (as an optional field in DS 01), clarify that there are alternatives to route the RTP to payers Service Provider. Some of these alternatives (for ex. redirect, directory services) can become an optional feature of the scheme. Therefore, the recommendation should not be e) for now, rather c) for in the future.
Finance Finland/Finnish Banking Community	No	We consider that the clarification paper complemented with Enrolment and Activation clarifies the rationale and various options to find out the identifier of the Payer's RTP SP. Option b) would be a more correct response.
French National Payments Committee (CNPS)	No	The CNPS invites the RTP taskforce to clarify the interplay between RTP identifiers (AT-01) and RTPSP identifiers (AT-06). For POS journeys with payer-presented RTP identifiers, either the RTPSP of the payee should be able to deduct the AT-06 from AT-01; or there should be a registry that provides this linkage. The CNPS fears a potential disruption in case the market does not reach an agreement to set-up a registry, as evidenced by the example of the SPL.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	No opinion	We assume that in the mid- to long-term centralised information on the routing and reachability of SRTP scheme participants will become necessary. However, we do not want to preclude that this needs to become a part of the rulebook or needs to be managed by the EPC. EPC should assess several options.
EuroCommerce	No	SRTP scheme should provide guidance how the participants should route the SRTP to the correct Payer's SRTP SP either in the rulebook or in a clarification paper.
Vseobecna uverova banka (VUB)	Yes	Mandatory attribute AT-06 can contain BIC or other Identifier of the Payer's RTP Service Provider and whereas this identifier



Contributor	Support	Contributor comments
		(BIC or other) is included in the routing table too, it is not needed to be incorporated in the Rulebook.
European Association of Corporate Treasurers	No	For EACT an interoperable SRTP eco-system requires the use of mechanisms (such as operational registers and/or directories) to securely store the identifiers of actors enabling the correct routing of SRTP messages. We support the concept that SRTP Rulebook should cover the issue at logical end process level.
Italian Banking Association	No	This matter should be further analysed for future inclusion in the scheme. Today no registry is in place for routing SRTP messages but this could be helpful for the development of the service.
Budget Insight	No	Without addressing this point, there is a risk that the SRTP scheme will have less chance to be implemented for real usages or that the implementation could be chaotic.
Febelfin	No opinion	
Gini GmbH	Yes	

5.2.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook together with change request CR#3 (Payee's enrolment and Payer's activation).



5.3 # 3: Payee's enrolment and Payer's activation

5.3.1 Description

This change request was provided by EuroCommerce.

It proposes to include an activation service exchanged between the Payer and the Payee. The SRTP activation service, using a standardised form factor, shall define and transport the electronic address to be used by the Payee/Payee's Service Provider to reach the Payer/Payer's Service Provider.

Guideline needs to be extended to support the Payer's activation and authentication through the Payer's Service Provider to exchange seamlessly RTP messages between the Payee and the Payer with the Payer's consent to activate and proceed with the RTP message presented by the Payer's Service Provider.

5.3.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

To cover the Enrolment/Activation processes the following elements would be included in the next version of the SRTP scheme rulebook:

A. Enrolment

a. Definition

The Enrolment is the actions and processes performed by an SRTP SP to ensure a Payee's or a Payer's operational readiness for using an SRTP service.

b. Process content

To proceed with the enrolment of the Payee, the Payee's SRTP SP should at least perform the following actions:

- proceed with the identification of the Payee.
- carry out KYC or equivalent checks of the Payee (i.e., Payee's identity, name, trade name...).
- carry out a check of the link between the Payee's identity and the Payee's IBAN(s) that will be used in the SRTP messages.
- provide a secure electronic channel to exchange SRTP messages.

To proceed with the enrolment of the Payer, the Payer's SRTP SP should at least perform the following actions:

- proceed with the identification of the Payer where possible and applicable;
- provide a secure electronic channel for using SRTP services.

At the end of the Enrolment process, the Payees/Payers may have an SRTP address.

The SRTP address is an address given by the SRTP SP to enable exchange of SRTP messages and is equal to the Identifier of the Payer + the Identifier of the Payer's RTP Service Provider (AT-01 +



AT-06²) for the Payer and the Payee's identification code + the Identifier of the Payee's RTP Service Provider (AT-24 + AT-35) for the Payee.

De-enrolment service must be provided as well.

The Payees and the Payers can be enrolled by several different SRTP SPs.

c. Illustrations

o Payer's enrolment.

Mrs Smith wants to be able to receive SRTP from her suppliers. She contacts SRTP Service Provider X (e.g., her bank or other service provider). SRTP SP X performs the Payer enrolment process to enrol Mrs Smith. Mrs Smith provides her identity and complementary information asked by the SRTP SP X. Then Mrs Smith is registered by the SRTP SP X as a Payer. She might receive an SRTP address and can now access the SRTP service.

o Payee's enrolment.

« #1TelecomSupplier » company wants to be able to send SRTPs to its customer. It contacts SRTP SP Y (e.g., its bank or other service provider). SRTP SP Y performs the Payee enrolment process to enrol #1TelecomSupplier. #1TelecomSupplier provides and proves its identity, its liabilities, and the other information needed by the SRTP SP Y (e.g., KYC or equivalent) and the IBAN(s) that will be used to receive payments. At the end of a successful enrolment process #1TelecomSupplier is registered by the SRTP SP Y as a Payee. It receives the information needed to send SRTP(s) to its SRTP SP Y (technical connection to the SRTP SP) and its SRTP address(es) that can be used within the SRTP scheme.

o Guest service Payer's enrolment.

Mr Johnson is shopping online at ShopOnline W, which is a successfully enrolled Payee. He is not yet enrolled with any SRTP SP. At the checkout he agrees to use the SRTP service offered by ShopOnline W for his one-off purchase. ShopOnline W offers a one-off enrolment through its own SRTP SP to Mr Johnson for his purchase.

B. Activation

a. Definition

The Activation is the mutual arrangement between the Payer that consents to receive SRTP messages and the Payee that agrees to send SRTP messages, and the exchange of the required information (e.g., SRTP addresses) enabling the Payee and/or the Payee's SRTP SP to send SRTP messages to the Payer and enabling the Payer to receive SRTP messages from the Payee. In the SRTP scheme, Consent means approval/authorization given by a Payer to a Payee to exchange SRTP through the SEPA RTP scheme. The Consent is a prerequisite for exchanging SRTP between two customers (a Payer and a Payee). It can be a permanent or a temporary Consent.

b. Process content

The activation process consists in the following:

² Remark: please be informed that the attributes numbering could be changed according to CR#17



- the consent/acceptance between the Payer and the Payee to receive/send SRTP messages between them. The Consent can be expressed or given tacitly. It can be for a one-off or non-fixed-term activation.
- the provision of the required information (e.g., SRTP addresses) enabling the Payee/the Payee's SRTP SP to send SRTP messages to the Payer and the Payer to receive SRTP messages from the Payee.

De-activation service must be provided between the Payer and the Payee as well.

Payers can have multiple existing SRTP services activated with the same Payee (in case of multiple contracts with this Payee for instance) or different Payees and vice versa.

The Payee's SRTP SP may be able to deduce the Identifier of the Payer's SRTP SP from the Payer's Identifier (e.g., Proxy Lookup service) or the Payer may give it to the Payee's SRTP SP, e.g., by choosing it or presenting a QR code or other tools incorporating the information.

Payer may also identify him/herself within their own SRTP SP service without the need to give any Identifier to the Payee or Payee's SRTP SP. For instance, depending on the way to forward an SRTP message (through a « redirection » or not) the identifiers that the Payee and/or the Payee's SRTP SP should collect are at the minimum the following:

- [for a standard forward of the SRTP] the Payer's identifier (AT-01³) (and the Payer's SRTP SP identifier (AT-06)).
- [for a « redirection » forward of the SRTP] only the Payer's SRTP SP identifier (AT-06).

Nota Bene: Other identifiers/data can be exchanged during the activation process for the purpose of additional value-added services provided by the SRTP SP. For example, the Payee's identification code could be communicated to the Payer to enable Payee's filtering services proposed by the Payer's SRTP SP.

This activation can be done by any mean left at the discretion of the actors inside or outside the scheme.

c. Illustrations

o Expressed consent

Mrs Smith wants to use SRTP service as a Payer but wants to receive SRTP only from the Payees she chooses, especially for recurring SRTP. She prefers the bilateral explicit activation. But she wants to activate a Payee outside of the SRTP scheme (she gives her consent and her SRTP address directly to the Payee when she signs a new contract for instance). She then manually adds the identifier of this Payee to the list of « authorised Payees » managed by her SRTP SP (whitelist) so that her SRTP SP will not reject the SRTP. Mrs Smith is well protected against unsolicited SRTP because no Payee can send her SRTP if she has not declared it to her SRTP SP.

o One-off activation with tacit consent.

Mr Smith is at the checkout of his favourite store. The cashier of the store (the Payee's clerk) asks if Mr Smith (in front of him) accepts to pay by SCT Inst through an SRTP. He says « yes » and presents his SRTP address within a QR Code. The cashier flashes the QR Code (exchange of consent). This is a tacit consent for a one-off activation between this Payee and this Payer, and the cashier (Payee's clerk) can immediately create and send an SRTP to Mr Smith.

³ Remark: please be informed that the attributes numbering could be changed according to CR#17



o Activation at an online POS with redirection.

Mr. Smith is shopping in a webstore. The merchant website proposes to Mr. Smith to pay by SCT through an SRTP. Mr. Smith accepts. Mr. Smith has an SRTP SP but he doesn't know how to get its SRTP identifier. Mr. Smith selects his SRTP SP in the list presented by the merchant website. The activation is done. The SRTP is sent without the full SRTP address of the Payer to the Payer's SRTP SP. His SRTP SP returns the redirection URL to the merchant. The merchant website automatically displays redirection URL related webpage to Mr. Smith. Mr. Smith connects to his SRTP SP's webpage, gives the needed identification and can read, accept the SRTP and continue with the purchase process.

o Guest service activation.

A client is shopping in a webstore. The merchant website proposes to the client that he / she should pay by SCT through an SRTP. The client accepts but does not have any SRTP SP and accepts to be a "guest" temporarily enrolled by the SRTP SP suggested by the merchant website. The guest SRTP SP enrolls the client « on the fly ». The temporary SRTP address of the client payer is automatically communicated by the Guest SRTP SP to the Payee's SRTP SP. The activation is done. Once the purchase process is completed, this client is automatically de-activated and de-enrolled.

o Activation for recurring payments (possibly through REDA ISO messages).

Mr. Smith has an SRTP SP which enables him to exchange activation requests with enrolled Payees. The energy supplier of Mr. Smith proposes to send its e-Invoice and request for payment through RTP. Either the activation is realised at the moment of the signature of the contract (out of the scheme). Alternatively, activation messages containing the SRTP address of Mr. Smith, (and so the tacit Consent of Mr. Smith) can be exchanged between the Payer's SRTP SP and the Payee's SRTP SP (with the appropriate REDA ISO message). The activation is done and in the second case this activation is known both by the SRTP SP of the Payer and the SRTP of the Payee. At the next due date of the supplier bill, an SRTP is sent by the energy supplier to Mr. Smith.

C. Changes that should be made to the SRTP scheme participant's obligations.

The proposed changes are highlighted in green in the text below.

[...] 3.6 Obligations of Participants

As a general principle, all Participants shall use all reasonable efforts, undertaken diligently and in good faith, to perform their obligations under the Rulebook, including but not limited to ensuring their continuous reachability and to handling the RTP process in a timely manner;

3.6.1 Obligations of a Payee's RTP Service Provider

A Payee's RTP Service Provider shall:

- 1) Ensure that Terms and Conditions exist governing the provision and use of services relating to the Scheme;*
- 2) Ensure that such Terms and Conditions are consistent with the Rulebook;*
- 3) Ensure that such Terms and Conditions make adequate provision for the Payee's RTP Service Provider succession (e.g., through merger or acquisition), in accordance with the Rulebook;*
- 4) Enter into an agreement governing the provision and use of services relating to the Scheme only after applying the principles of identity verification;*
- 5) Ensure that such agreement is consistent with the Rulebook and that such agreement is complete, unambiguous and enforceable;*



6) *Not restrict its Payees from obtaining similar services relating to the Scheme from any other Payee's RTP Service Provider;*

7) *Provide to the Payer's RTP Service Provider the required RTP information in sufficient time and manner to allow the Payer's RTP Service Provider to comply with its obligations under the Rulebook;*

8) *Identify the RTP to the Payer's RTP Service Provider as an RTP made under the terms of the Scheme;*

9) *Treat any RTP not fulfilling the requirements of the Rulebook outside the Scheme or decline to process such instruction;*

[Enrolment related]

XX) *Verify the identification and carry out KYC or equivalent checks of the Payees (i.e., Payee's identity, name, trade name...);*

XXX) *Ensure that the Payee is the account owner of the account(s) directly or indirectly (i.e. financing firms) that will be used as the IBAN of the Payee in the SRTP messages;*

10) *Provide to Payees the means (e.g., SRTP address, secure electronic channel ...) of initiating RTPs and accepting the applicable data and format requirements;*

[Activation related]

11) *Provide Payees with adequate information on their risks as well as the respective rights and obligations of the Payee, Payer, Payer's RTP Service Provider and Payee's RTP Service Provider, where relevant, including those specified in the applicable legislation, in relation to the RTP as well as to the Scheme in question, information about the service level offered and any charges that apply to the service being performed and information regarding the Activation principles, especially the obligations for the Payee to get the Consent of the Payer before sending an SRTP;*

12) *Provide to Payees information for the submission and execution of RTPs through each available channel;*

13) *Process any RTP received and related messages for its Payee Instantly on a 24/7/365 basis;*

14) *Apply the standards set out in the RTP Service Provider Implementation Guidelines [3] to the processing of its received RTPs and to the provision of information to its Customers*

15) *Validate the syntax of the RTP, accept it if it is in accordance with the requirements of the Rulebook, and carry out response processing in accordance with the Rulebook if it is invalid together with a reason code and forward to the Payer without delay;*

16) *Ensure the authenticity and validity of the Payee's instructions;*

17) *In the event of a dispute, provide to the Payer's RTP Service Provider an explanation as to how an RTP has been processed and any further information reasonably requested;*

18) *Provide an explanation to the Payee of the reason for rejecting any RTP in a manner and within a timeframe as may be agreed with the Payee;*

19) *Following positive validation of an RTP, route the RTP to the specified Payer's RTP Service Provider Instantly*

20) *Effectuate response processing in accordance with the Rulebook;*

21) *Ensure adequate risk management and security, in particular compliance with the applicable provisions included in the Risk Management Annex (see Annex III);*

22) *Ensure the ongoing compliance of its own rules, procedures and agreements with the laws, regulations and generic supervisory requirements applicable to them;*



23) Enter into legally binding agreements with their RTP related service providers covering all functions performed by those providers in direct connection with the Scheme, ensure that such agreements are complete, unambiguous and enforceable on each contractual party and safeguard the ongoing compliance of such agreements with the laws applicable to them;

24) Immediately (without any further delay) report to the EPC about unmitigated Risks of scheme-wide Importance;

25) Without delay report to the EPC about issues or complaints related to RTPs that were raised by Payees and about internal or external audit findings, where such issues, complaints or findings are of scheme-wide importance; A Payee's RTP Service Provider shall oblige each of its Payees, in relation to any RTP which the Payee's RTP Service Provider accepts, in accordance with the relevant requirements set out in the Rulebook, to:

26) Provide the Payee's RTP Service Provider with sufficient information for the Payee's RTP Service Provider to process the RTP in compliance with the Rulebook;

27) Supply the required RTP data accurately, consistently, and completely.

3.6.2 Obligations of a Payer's RTP Service Provider

A Payer's RTP Service Provider shall:

1) Ensure that Terms and Conditions exist governing the provision and use of services relating to the Scheme;

2) Ensure that such Terms and Conditions are consistent with the Rulebook;

3) Ensure that such Terms and Conditions make adequate provision for the Payer's RTP Service Provider succession (e.g., through merger or acquisition), in accordance with the Rulebook;

4) Enter into an agreement governing the provision and use of services relating to the Scheme only after having identified its customers, where possible and applicable;

5) Ensure that such agreement is consistent with the Rulebook and that such agreement is complete, unambiguous and enforceable;

6) Not restrict its Payers from obtaining similar services relating to the Scheme from any other Payer's RTP Service Provider;

7) Provide to the Payee's RTP Service Provider the required RTP response information in sufficient time and manner to allow the Payee's RTP provider to comply with its obligations under the Rulebook;

8) Identify the RTP to the Payee's RTP Service Provider as an RTP made under the terms of the Scheme;

9) Treat any RTP not fulfilling the requirements of the Rulebook outside the Scheme or decline to process such instruction;

[Enrolment related]

XX) Ensure the identification of the Payers where possible and applicable;

XX) Provide the Payers with the means (e.g., SRTP address, secure electronic channel...) to receive SRTP messages and responding to them;

[Activation related]

10) Provide Payers with adequate information on their risks as well as the respective rights and obligations of the Payee, Payer, Payer's RTP Service Provider and Payee's RTP Service Provider, where relevant, including those specified in the applicable legislation, in relation to the RTP as well as to the Scheme in question, information about the service level offered and any charges that apply to the service being



performed and information about the Activation principles, especially the obligations for the Payee to get the Consent of the Payer before sending an SRTP;

- 11) *Process any RTP received and related messages for its Payer Instantly on a 24/7/365 basis;*
- 12) *Apply the standards set out in the RTP Implementation Guidelines [3] to the processing of its received RTPs and to the provision of information to its Customers;*
- 13) *Validate the syntax of the RTP, accept it if it is in accordance with the requirements of the Rulebook, and carry out response processing in accordance with the Rulebook if it is invalid together with a reason code and forward to the Payer without delay;*
- 14) *Ensure the authenticity and validity of the Payer’s instructions;*
- 15) *In the event of a dispute, provide to the Payee’s RTP Service Provider an explanation as to how an RTP has been processed and any further information reasonably requested;*
- 16) *Clearly indicate that the Payer has a choice between accepting or refusing an RTP*
- 17) *Effectuate response processing in accordance with the Rulebook;*
- 18) *Ensure adequate risk management and security, in particular compliance with the applicable provisions included in the Risk Management Annex (see Annex III);*
- 19) *Ensure the ongoing compliance of its own rules, procedures and agreements with the laws, regulations and generic supervisory requirements applicable to them;*
- 20) *Enter into legally binding agreements with their RTP related service providers covering all functions performed by those providers in direct connection with the Scheme, ensure that such agreements are complete, unambiguous and enforceable on each contractual party and safeguard the ongoing compliance of such agreements with the laws applicable to them.*
- 21) *Immediately (without any further delay) report to the EPC about unmitigated Risks of scheme-wide Importance;*
- 22) *Without delay report to the EPC about issues or complaints related to RTP that were raised by Payers and about internal or external audit findings, where such issues, complaints or findings are of scheme- wide importance.*

5.3.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française -	Yes	This an essential feature! We would like to come back to the notion of Guest service



Contributor	Support	Contributor comments
<p>French Banking Federation (FBF)</p>		<p>Payer’s enrolment. It should only occur if and only if the Payer is not yet enrolled by a RTP SP. This is to avoid any risk of transforming a need for RTP directly into a payment initiation knowing that the functional coverage of a RTP is richer than a payment initiation (accept later option, updating the amount, ...).</p> <p>We can read the identification of the Payer by the SRTP SP has to be done « where possible and applicable » without further explanations. As is, that could be a weakness of the end-to-end trust chain (from the Payee to the Payer). If the possibility to not identify the Payer is only applicable when the RTP is transformed into a payment initiation through redirect process, that has to be specified clearly. Thanks to that it will reinforce the fact that all actors are to be identified by transparency principle, with only the one exception above. « At the end of the Enrolment process, the Payees/Payers may have an SRTP address. », we would replace « may » by « must » because we think there should always have an SRTP address at the end of this process even if it is a “temporary” one especially in one-off cases</p> <p>Otherwise, the rulebook does not mention if the Payee’s identification code is provided by the SRTP SP or the Payee himself.</p> <p>For consistency we suggest using the same name for the attributes AT-24 and AT-01.</p> <p>To ensure a smooth customer journey many procedures should be clarified such as:</p> <ul style="list-style-type: none"> - Guest service: does this mean that the guest SRTP SP must use (first) the SRTP in "redirect" mode as a priority (or preferentially) and if the RTP SP of the Payer refuses the RTP (because the Payer is not enrolled) then in this case the TPP can switch to "guest" mode? - Guest service Payer’s enrolment: it would be important to clarify how the payee via his own RTP SP can offers the access to his payer - Guest service activation: when the payer accepts temporarily to be invited by a RTP SP proposed by the merchant payee. In practice it would be important to clarify how the payment is triggered when the payee's SRTP SP does not know the payer and how can he manages the payment execution after (via the redirection process to the payer’s PSP ?)
<p>Dutch Payments Association</p>	<p>Yes</p>	



Contributor	Support	Contributor comments
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	No opinion	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	For EACT structured and electronic Payee's and Payer's enrolment and Payer's activation processes are essential to guarantee following smooth and secure SRTP messages flows. In particular Payee's activation together with Payee's centralized or decentralized directories allows Payer's SRTP SP to electronically identify Payees in SRTP messages and to route Payer's activation messages to Payees. Payer's activation is essential to guarantee Payer's consent to receive SRTPs from any or from a specific payee. Considering the magnitude of changes to be made to the SRTP Rulebook, we support the suggestion to include it in the next version of the rulebooks.
EBA CLEARING	Yes	EBA CLEARING welcomes the clarification on the aspects of Enrolment and Activation as part of the scheme, illustrated by the examples. At this moment the RTP TF proposal does not provide detail on how foreseen processes would be covered under the scheme, we assume that the scheme will allow for different possibilities, depending on SRTP based uses cases and solutions.
Italian Banking Association	No	The proposed activation process between the Payee and the Payer risks creating further barriers to the adoption of the service. The activation represents the agreement/consent between the Payee and the Payer to use the RTP which can be expressed in various ways (verbal, written, through online processes, etc.) but without the need to provide for a formal mechanism of activation-deactivation between the parties. Especially, the integration of point 10 of chapter 3.6.2 risks reducing the applicability of the RTP to some use cases. For



Contributor	Support	Contributor comments
		<p>this specific point, we suggest deleting the sentence "especially the obligations for the Payee to get the consent of the Payer before sending an SRTP". The RTP should always be received by the Payer for subsequent acceptance/refusal and in some cases may assume the role of "advice to pay", without previous consent given by the Payer for sending a SRTP</p>
Budget Insight	No	<p>This could make the SRTP scheme really hard to use with a lot of cases.</p> <p>Final user interactions are already complicated with payment SCA requirements, if more complexity is required to onboard users, create stateful links between pairs of RTP providers, have interaction steps at RTP request time or before, alternative will be used instead of RTP.</p> <p>The only step that is interesting, is the retrieval of Payer's identifier during activation, but this looks like to be better handled by the CR 10.</p>
Febelfin	No opinion	
Gini GmbH	No	<p>We agree with the SRTP TF that every participant in the scheme should be able to enter into commercial agreements with any other participant that is relevant to their business. However, it is fundamental for the success of this scheme to guarantee that every enrolled user can reach any other participant of the scheme, even without a commercial agreement.</p> <p>For users who choose to pay with SRTP at an online ecommerce, receiving a negative response due to lack of contract between the parties would be unacceptable. Users don't need to know who their SP is and if they have an agreement with the merchant's one. This type of experience makes users reluctant to try SRTP again.</p> <p>For this reason, the sole membership to the SRTP scheme should oblige each participant to accept a default commercial agreement in the absence of a 1-to-1 agreement. This agreement establishes a standard fee a Payer SP would charge a Payee SP for enabling successful reachability among both.</p> <p>A few recommendations for setting this standard fee:</p> <ol style="list-style-type: none"> 1. It should be priced slightly over the average market fee to motivate agreements among participants with high volume exchanged. 2. It could consist of a fixed and variable amount based on the total amount paid by the user, with lower and upper limits.



Contributor	Support	Contributor comments
		<p>3. In addition to a standard fee for an approved SRTP message, establishing a small fee for rejected SRTP (or unresponsive) could be necessary for sustainability reasons and for preventing indiscriminate delivery of SRTP.</p> <p>4. It should charge P2P use cases differently or even waive fees for such use case payment.</p> <p>Furthermore, from an administrative perspective, we believe that the effort for each participant of closing 1-to-1 agreements with all other scheme participants, is too high and will result in insufficient reachability for Payers and Payees.</p>

5.3.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.4 # 4: Request for instalment payments

5.4.1 Description

This change request was made by EuroCommerce.

It proposes to provide an RTP Instalment payments service.

A PSP could authorise through an RTP request, the Payer to split the payment of a single purchase of goods or services into a finite number of periodic transactions, with a specified end date. The merchant will be entitled to be immediately compensated for the full payment amount.

Guideline need to be extended to support split payments over a finite period of time.

5.4.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that the request for instalment payments feature could be implemented in the SRTP scheme as described below.

The Payee would be able to choose the values of the different amounts and their respective Requested Execution Date and indicate them in the RTP message. Or, subject to a prior bilateral agreement with the Payee, the Payer could choose the values of the different amounts and their respective Requested Execution Date in its positive response to the RTP.

Once accepted by the Payer, all the occurrences of the RTP will be considered as accepted.

As it is already the case, the cancelation of the RTP is possible as long as no answer from the Payer has been received and/or as long as the RTP is not expired.

Remark: the inclusion of this change in the third version of the SRTP scheme rulebook is subject to the implementation of some changes in the SRTP ISO 20022 XML messages in due time.

However, the agreements concluded between the merchant, the Payer and the Payer’s PSP about the possible immediate compensation of the merchant, are out of the scope of the SRTP scheme and would not be covered by the above-described change.

The RTP TF recommends including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

5.4.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	



Contributor	Support	Contributor comments
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	For the practical implementation, that would depend on ISO20022 to provide the relevant change. See recent ISO agreement allowing several execution dates for a single RTP.
Dutch Payments Association	Yes	Depending on how this request will be worked out in the Rulebook. Consumer protection is point of attention.
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	We agree with the incorporation of this functionality, but it should be done contemplating not only the possibility of the RTP payee offering payment in instalments, but also the Service Providers themselves offering financing to their clients, either to the payee by advancing the total amount of a transaction he/she is going to be paid in instalments, or to the payer by facilitating the payment of an RTP in instalments. For this, the fields that refer to the following concepts should be included: total amount; deferrable amount; business activity code; support (or not) of differentiated quotas: a) all quotas are equal, b) the first quota is different from the rest; number of instalments; differentiated instalment amount; amount rest instalments; TIN; APR; fee calculation mode: fixed amount, percentage, percentage without interest the first instalment...; total value of the fee; fee percentage; total amount of the operation with financing cost, etc.
German Banking Industry Committee (GBIC)	No opinion	See comments under CR #5.
EuroCommerce	Yes	
Westhafen Expert Dialogue Instant Payments	Yes	Based on the SRTP, the payer should be able to decide to pay the full amount in one payment OR to use the offered amounts and dates for instalment payments. Therefore, the SRTP message pain.013 must deliver both, the amount to pay in one transaction AND the amounts and dates for the instalment payments. The response message pain.014 must inform about the decision, i.e. one payment or



Contributor	Support	Contributor comments
		acceptance of instalment payments. The amount for one payment does not need to be equal to the total of the instalment amounts.
Vseobecna uverova banka (VUB)	No	If debtor will accept RTP from creditor, in case of the acceptance's debtor is necessary to indicate what will happen if there is not enough funds on account to execute instalment on due date. We think that it has to be also on Payer's PSP decision if RTP with included instalment will be accepted by him - so it is not mandatory for Payer's PSP to provide this service. We think this service has to be set as optional.
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.4.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.5 # 5: Request for instalment payments

5.5.1 Description

This change request was made by the French Public Finance Public Administration.

It proposes to allow the usage of request for instalment payments.

5.5.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

The Payee would be able to choose the values of the different amounts and their respective Requested Execution Date and indicate them in the RTP message. Or, subject to a prior bilateral agreement with the Payee, the Payer could choose the values of the different amounts and their respective Requested Execution Date in its positive response to the RTP.

Once accepted by the Payer, all the occurrences of the RTP will be considered as accepted. As it is already the case, the cancelation of the RTP is possible as long as no answer from the Payer has been received and/or as long as the RTP is not expired.

Remark: the inclusion of this change in the third version of the SRTP scheme rulebook is subject to the implementation of changes in the SRTP ISO 20022 XML messages in due time.

5.5.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate this change request in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	See above
Dutch Payments Association	Yes	See remark (CR#4)
Finance Finland/Finnish Banking Community	Yes	



Contributor	Support	Contributor comments
French National Payments Committee (CNPS)	Yes	The CNPS warmly welcomes this decision and the EPC's request for modification of the ISO standard.
Spanish Banking Community	Yes	Same than CR #4
German Banking Industry Committee (GBIC)	Yes	It should be noted that such a mechanism might be enabled a) via several RtP-messages (one RtP-message for each instalment, could be sent at the same time) or b) via one RtP-message (encompassing all instalments) (trade-off complexities payer- vs. payee-side, "readiness of ISO-messages"). German market expresses strong preference for option a) as a first step in order to limit complexity, in particular for the payer's side. The single RtP-messages for each instalment could be linked via a designated identifier. The evolution towards a more sophisticated version b) could be assessed at a later stage.
EuroCommerce	Yes	
Westhafen Expert Dialogue Instant Payments	Yes	see CR# 4
Vseobecna uverova banka (VUB)	No	In case of acceptance is necessary to indicate that funds should have been reserved from payer's account to have enough funds on due date to execute instalment. Or it has to be described in the Rulebook how to solve the situation when there is not enough funds on due date to execute the instalment
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.5.4 Board decision

The change request is to be included in the next version (v3.0) of the SRTTP scheme rulebook.



5.6 # 6: Allow the Payer and the Payer's SRTP Service Provider to initiate a cancellation in case of instalment payments

5.6.1 Description

This change request was made by the Spanish Banking Community.

It proposes to include the possibility for the Payer and the Payer's SRTP Service Provider to cancel a RTP message in case of instalment payments. If the RTP allows the Payer to pay in instalments (for example, monthly payments or a subscription), it should be considered that both the Payer and the Payer's SRTP Service Provider can cancel the RTP at any time, regardless of whether the RTP was accepted at the beginning.

5.6.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that once a RTP message has been accepted or refused, it is expired and cannot be processed any further.

If an SRTP with a request for instalment payments was accepted, the related payments will already be foreseen, and a payment cancellation is out of the scope of the SRTP scheme.

Therefore, the RTP TF recommends not taking forward the change request - (option e).

5.6.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to include the change request in the next version (v3.0) of the SRTP scheme rulebook given that the majority of the contributors support this RTP TF recommendation. The response to an SRTP message is final and cannot be changed anymore, but the related payment could still be cancelled.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	There seem to be a confusion between SRTP and payment. The response by the Payer to the SRTP (positive, negative or time-out) is always final and cannot be changed, otherwise it would lose any meaningful value. On the other hand, according to PSD2, a future payment can always be cancelled up to the business day when it is scheduled to happen.
Dutch Payments Association	No	Depending on the use case for instalment payments, payer must have the possibility to cancel an RTP. For ex. in case of instalment payments for ongoing services (like subscriptions, utility bills).



Contributor	Support	Contributor comments
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	This change would make the RTP scheme less reliable for payees.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No	Once instalment was accepted by payer or by payer's PSP, it is not allowed to cancel it - this should be included in Rulebook, from the bank's point of view it is important.
European Association of Corporate Treasurers	No opinion	For EACT a legal analysis should be done in order to clarify if an accepted SRTP with instalments is within the scope of PSD art. 80 (2) and therefore, once accepted cannot be revoked in any part or is within the scope of PSD art. 78 (2) and any instalment corresponds to a deferred execution time, in such a case an instalment could be cancelled within the day before the deferred execution date of such instalment.
Italian Banking Association	No	This functionality could be useful in case the change request related to instalment payments is incorporated into the scheme.
Budget Insight	Yes	
Febelfin	Yes	Optional for the payer and payers PSP, mandatory to communicate by the payees PSP to the payee.
Gini GmbH	No opinion	

5.6.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.7 # 7: Instalment payments

5.7.1 Description

This change request was provided by Fundu Technology Oy.

It proposes to include the request for instalment payments in the SRTP scheme rulebook because it is a crucial feature for e-commerce payments and invoicing of high value services.

5.7.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

The Payee would be able to choose the values of the different amounts and their respective Requested Execution Date and indicate them in the RTP message. Or, subject to a prior bilateral agreement with the Payee, the Payer could choose the values of the different amounts and their respective Requested Execution Date in its positive response to the RTP.

Once accepted by the Payer, all the occurrences of the RTP will be considered as accepted. As it is already the case, the cancelation of the RTP is possible as long as no answer from the Payer has been received and/or as long as the RTP is not expired.

Remark: the inclusion of this change in the third version of the SRTP scheme rulebook is subject to the implementation of changes in the SRTP ISO 20022 XML messages in due time.

5.7.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	
Dutch Payments Association	Yes	See remark (CR#4)
Finance Finland/Finnish	Yes	



Contributor	Support	Contributor comments
Banking Community		
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	Same than CR #4
German Banking Industry Committee (GBIC)	No opinion	See comments under CR #5.
EuroCommerce	Yes	
Westhafen Expert Dialogue Instant Payments	Yes	see CR# 4
Vseobecna uverova banka (VUB)	No	For acceptance is necessary to indicate that funds should have been reserved from payer's account to have enough funds on due date to execute instalment. Or it has to be described in the Rulebook how to solve the situation when there is not enough funds on due date to execute the instalment
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.7.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.8 # 8: Recurring payments

5.8.1 Description

This change request was provided by Fundu Technology Oy.

It proposes to include recurring payments in the SRTP scheme rulebook because it is a crucial feature for e-commerce payments and in-app payments of subscription services to overcome domination of payment cards (card-on-file).

5.8.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that the Payee can already send a RTP every month and accordingly, the Payer will have to respond every month. This process could be automated at the Payee's or at the Payee's SRTP Service Provider's side, but this would not be part of the scope of the SRTP scheme.

The RTP TF is of the opinion that this change request is already provided for in the scheme – (option a).

5.8.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF is of the opinion that the change request is already provided for in the scheme. An automatic solution could however be reassessed in the future.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Contrary to instalments when the payments are known in advance and set into future dates, this is about being able to send a potential variable bill every month (e.g. ,Telephone bill). This is already taken care of by sending the relevant SRTP each time a new bill is to be paid.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No	A recurring RTP would provide payers (and particularly the disadvantaged) greater flexibility in their resources



Contributor	Support	Contributor comments
		management; and avoid payment incidents management for payees.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	EACT agrees that single recurring payments could be already managed by sending different periodic SRTP. Furthermore, the inclusion of instalments in the SRTP RB could cover further cases of subscription services.
Italian Banking Association	Yes	
Budget Insight	No	Yes, this can be handled by a new RTP request for every occurrence, but it is a risk for the payee to have the payer accept little bit little each occurrence, instead of all of them in one go initially.
Febelfin	No opinion	
Gini GmbH	No opinion	

5.8.4 Board decision

The change request is already provided for in the scheme.



5.9 # 9: Redirection of the Payer to the appropriate merchant's web page based on the final status of the RTP response.

5.9.1 Description

This This change request was made by Finance Finland/Finnish Banking Community.

It proposes to redirect the Payer to the appropriate merchant's web page based on the final status of the RTP response.

For a common standard and to support smooth customer experience in e-commerce use cases, the Payer could be redirected automatically back to the merchant's appropriate web page after positive or negative response to the RTP. This would be accomplished by the redirect URL link(s) provided by the Payee's RTP SP with the original RTP message and the status of the RTP.

Merchant's appropriate web page will be presented based on whether the RTP is accepted, rejected, or refused. The Payer would not need to navigate themselves back to the merchant's page but would see the end status with the purchase and delivery directly after acceptance or refusal of the RTP message in the Payer's RTP SP application.

This is different to the attribute AT-92, URL sent by the Payee to the Payer in the RTP, which is used to show or complement information related to the RTP. That URL link can be opened by Payer's active decision to see for example the full invoice. The Redirect URL would not require any action from the Payer (can naturally be presented as a link in Payer's RTP SP UI to click in case the redirection does not work automatically for some reason).

This change would require adding a redirect URL (or the possibility to use several different redirect URLs for the various end statuses, depending on implementation) in the pain.013 message for return address where the Payer's RTP SP should direct the Payer after the acceptance or refusal of the RTP, and a definition of the element to be used in pain.013 for redirect URLs and guidelines on the usage.

5.9.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the view that the aim of this change is part of the commercial space, but it could technically be enabled to transport a "Return to merchant URL "in the SRTP related APIs and in the Creditor Payment Activation Request (pain.013) XML message if possible.

The RTP TF suggests including the change request in the scheme as an optional feature - (option c).

5.9.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate this change request as an optional feature in the next version (v3.0) of the SRTP scheme.

Public consultation feedback:



Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This is an optional feature (same as URL). It can easily be implemented in APIs and is to be determined how that could be done with I.G.s. In any case a new attribute should be defined to include the return URL. To be clarified. See below in CR#10
Dutch Payments Association	Yes	Yes, and this should be supported by XML messaging as well. Not only by API's.
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	Provided that RTPSP set up appropriate security measures to avoid the use of fraudulent URLs.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No opinion	
European Association of Corporate Treasurers	Yes	
EBA CLEARING	Yes	EBA CLEARING's user community has requested and foreseen this application of Request to Pay at an early stage, as an optional feature
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	



Contributor	Support	Contributor comments
Gini GmbH	Yes	We concur with the recommendation. Nevertheless, the field should not be restricted to Web pages URLs but allow any kind of redirection interface including mobile ones (supported by deep links or universal links).

5.9.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook



5.10 # 10: Redirect clarification/specification and the extension of the use of the SRTP positive response

5.10.1 Description

This change request was provided by the Dutch Payments Association.

It proposes on one side, a redirect process. Based on the RTP with Payer's RTP Service Provider's authentication URL (or another token), the Payee redirects the Payer to the Payer's RTP Service Provider where the Payer can authenticate himself by the means provided by the Payer's RTP Service Provider.

And on the other hand, to add the possibility to deliver to the Payee in the SRTP response a Confirmation (message) that the Payment will be irrevocably executed.

Introduce the optionality to use the SRTP positive response to deliver to the Payee a Confirmation (message) that the Payment is or will be irrevocably executed. Based on that information the Payee can rest assure that the Payment amount is or will be received and that the delivery process can be started in those cases where certainty that the payment is or will be made is a precondition. This response in the SRTP message flow will cater for getting this information directed to and available at the online and physical Pol/PoS (separate from the payment flow).

5.10.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that this change consists in two requests:

- a. A redirect process.
- b. A request for payment initiation status.

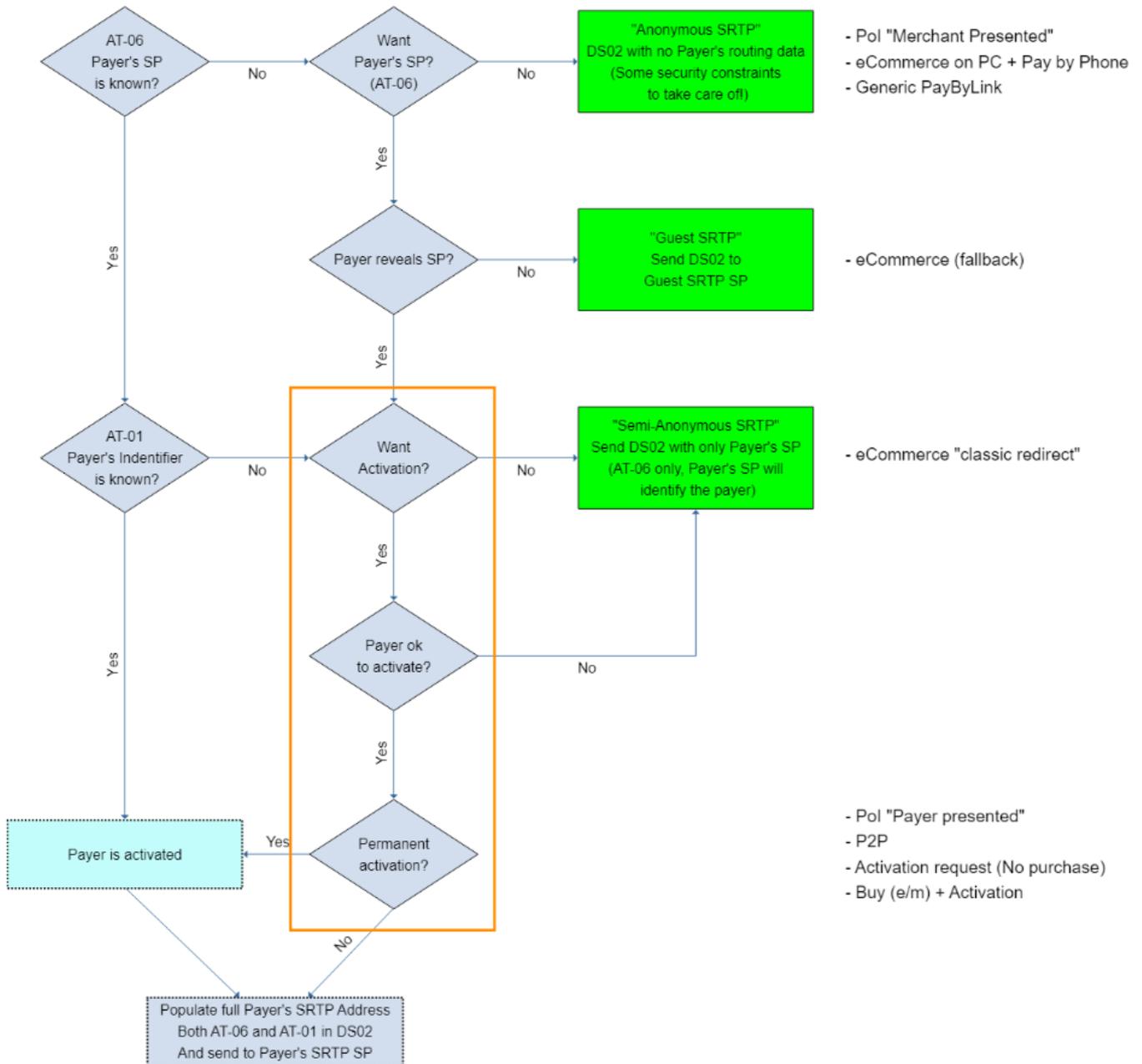
a. Redirect process

Regarding the redirect process, the RTP TF of the view that for e-commerce use cases, if the Payee or the Payee's SRTP Service Provider does not know how to route SRTP messages to the Payer (or Payer's SRTP Service Provider) and if APIs are used, the below redirection flow could be used:

- Step 1: The Payee (or its SRTP Service Provider) asks for the Service Provider of the Payer
- Step 2: The SRTP Service Provider of the Payee sends an SRTP message to the SRTP Service Provider of the Payer that has just been selected:
 - with Attribute AT-01 (Identifier of the Payer) filled in with "Not provided".
 - (optionally) with a "Return to merchant URL"
- Step 3: The Payer's SRTP Service Provider will provide the URL where to redirect the Payer to the Payee's SRTP Service Provider
 - 201 (created) with Resource ID
 - URL where to redirect the Payer (at its SRTP SP)
- Step 4: The SRTP Service Provider of the Payee redirects the Payer as specified in the above API response
- Step 5: The SRTP Service Provider of the Payer identifies the Payer



- Step 6: The SRTP Service Provider of the Payer can now associate the previously “semi-anonymous” SRTP message to the Payer. The usual SRTP flow continues.

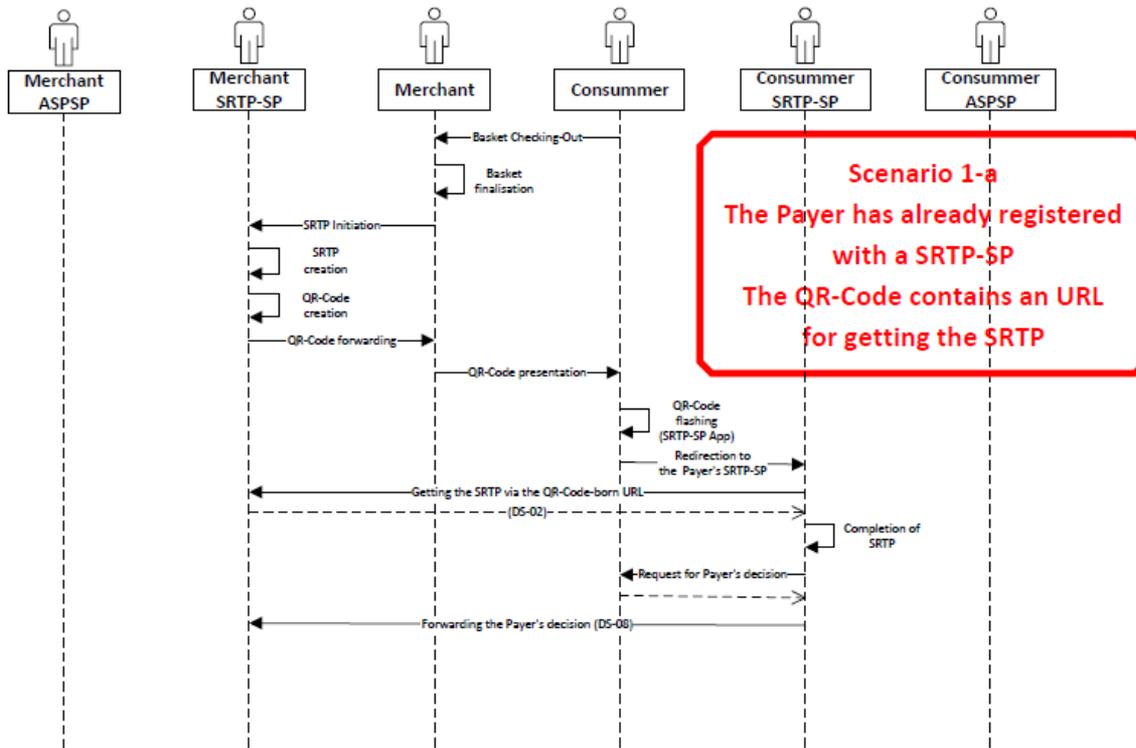


In the case when the Payer is at a Point of Sale (PoS), if the Payer has subscribed to the SRTP service and therefore has an SRTP Service Provider (scenario 1a), he could for example present a QR code to the Payee (or any other technical mean to exchange the required information). The Payee by flashing the QR code will receive all the required information about the Payer’s SRTP Service Provider (and optionally a call back URL (scenario 1b, for which security and capacity issues would however have to be tackled)) and will be able to send the SRTP message. Another option is that the Payee will for example present a QR code to the Payer (or any other technical mean to



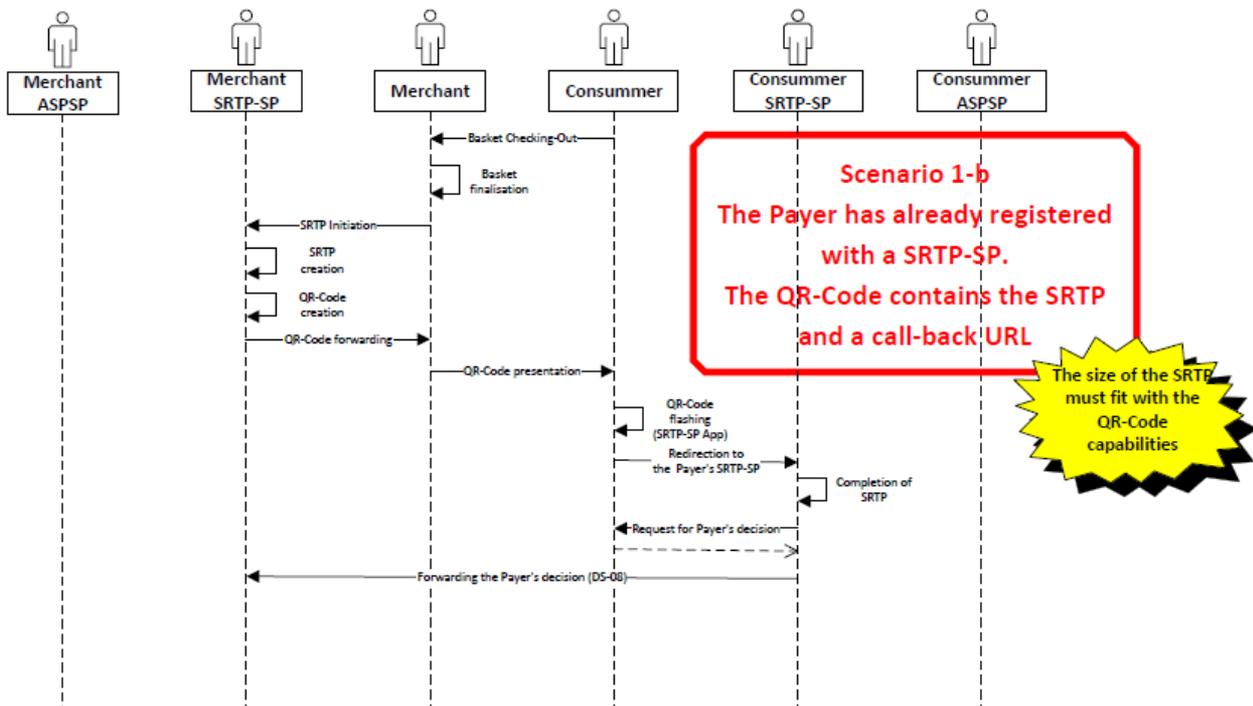
exchange the required information). By flashing the QR code, the Payer will accept to use the SRTP service and will have to indicate which is its SRTP Service Provider. The Payee’s SRTP Service Provider will then be able to send the SRTP message to the Payer’s SRTP Service Provider (scenario 2a).

If the Payer has not subscribed to the SRTP service yet, he could select a ‘guest’ SRTP service Provider for this one-off transaction (scenario 2b).

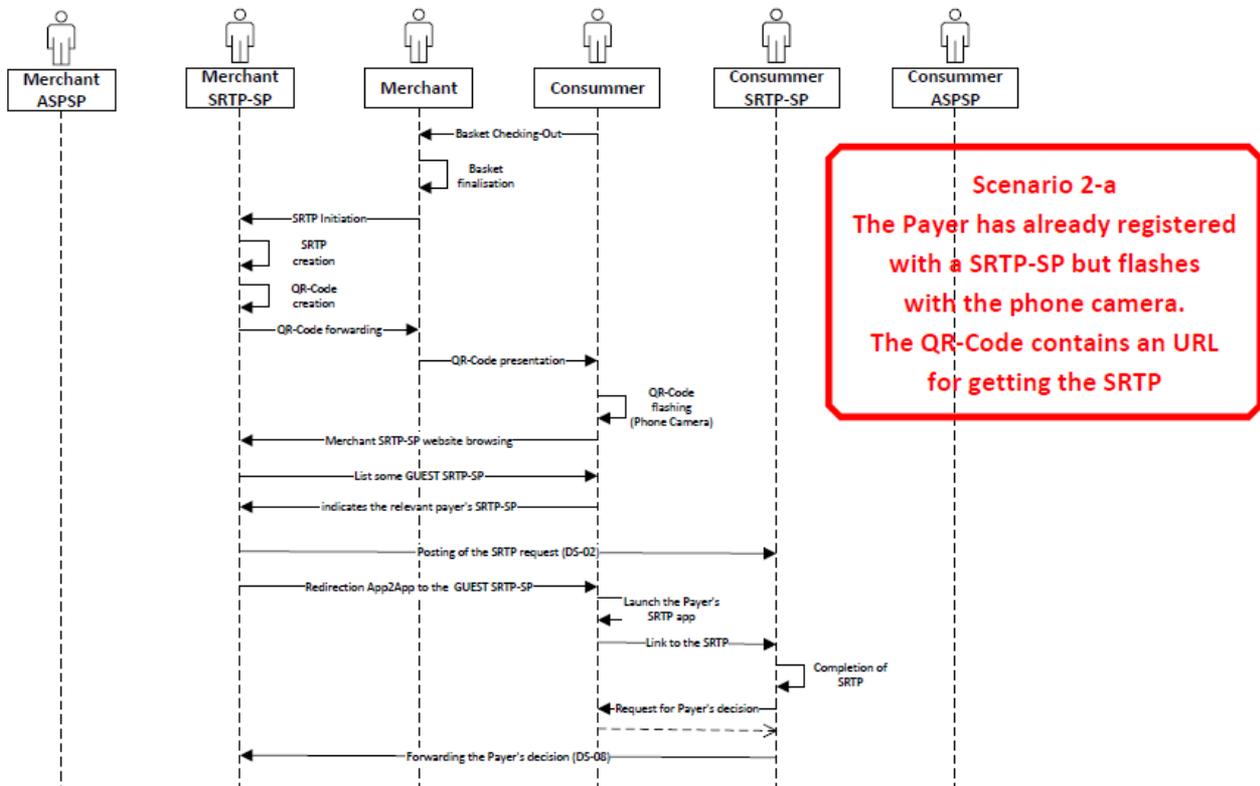


Scenario 1-a
 The Payer has already registered with a SRTP-SP
 The QR-Code contains an URL for getting the SRTP

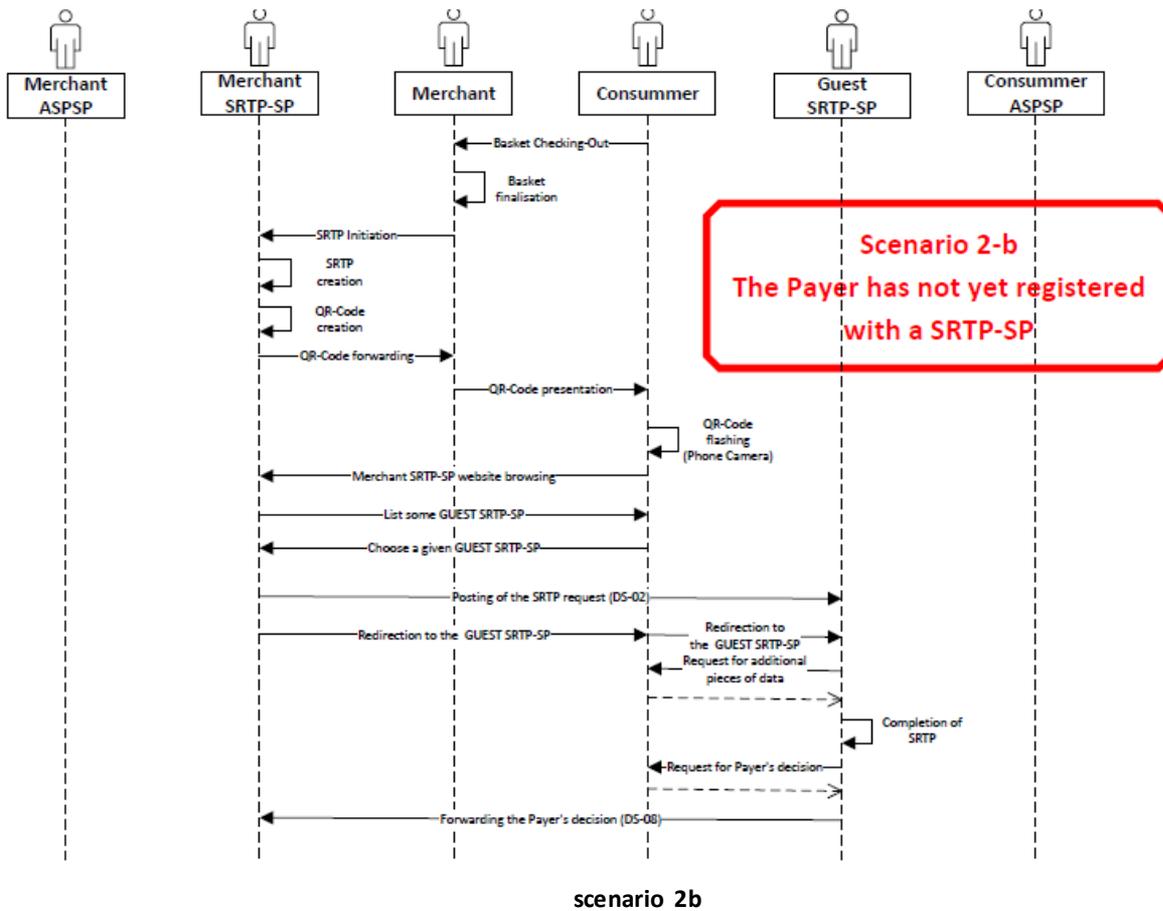
scenario 1a



scenario 1b (Security and capacity issues would have to be tackled)



scenario 2a



The RTP TF suggests including the change request in the scheme as an optional feature - **(option c)**.

- b. Request for payment initiation status

The RTP TF believes that this feature could be optional and only applicable to the 'Accept now/Pay now' use cases. The Payee would be able to request in the SRTTP message a payment initiation (or execution in the case of an Instant Payment) status. In its response to the SRTTP message, the Payer would have the possibility to confirm that the payment is initiated (or executed in the case of an Instant Payment). To demonstrate that the payment is effectively initiated and accepted by its PSP (or executed in the case of an Instant Payment), the Payer would have to provide various payment related information (e.g., the PSP identification, the payment reference).

The RTP TF suggests including the change request in the scheme as an optional feature - **(option c)**.

5.10.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate both requests as optional features in the next version (v3.0) of the SRTTP scheme given that the majority of contributors support this RTP TF recommendation.



Public consultation feedback:

- Redirect process.

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This is especially useful when the Payee does not have the "full SRTP address" (as defined by E/A). Yet, the SRTP SP identifier is necessary to be able to redirect somewhere (or otherwise use the degraded process described by CR19 for V2 when this information is still absent) See CR # 2 and 3 What is the level of optionality for those "URL" features? For the payee's SRTP SP? The payer's SRTP SP? A combination of both? Does the redirect URL of CR#10 only at API level, without impact on XSD messages? For the CR#9, with the transport of the URL (back to the payee web site), as we have already put some limitation/possibility not to transport an "URL" for security reasons, we need probably to add possible limitation for this redirect" URL" option.
Dutch Payments Association	Yes	However, the answers say that "if API's are used". API's may not be conditional for the redirect. The redirect should be independent of the interface technology used.
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of	Yes	



Contributor	Support	Contributor comments
Corporate Treasurers		
EBA CLEARING	Yes	EBA CLEARING's user community has requested and foreseen this application of Request to Pay at an early stage, as an optional feature
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	No opinion	

- Request for payment initiation status.

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This feature is not always possible (for RTP SP as non PSP) and not always relevant (i.e., guarantee or certainty of payment), so only given as information (as the purpose of the SRTP scheme). It can be provided as an option for any Credit Transfer use case. This CR is at the border of (the integration with) the Payment Scheme. It meets the need to get an end-to-end process from RTP to payment however it is important to respect a clear Level Playing Field among all Participants.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	We support the EPC's opinion, but it should also be extended to the case of 'Pay later', where it would be even more necessary considering that the Payee would have to wait



Contributor	Support	Contributor comments
		further and maybe without knowing the specific moment when the Payer is actually going to launch the payment.
German Banking Industry Committee (GBIC)	Yes	- Information towards payee should in any case require (single?) consent on behalf of the payer - Should in any case be on an optional feature for scheme participants (not mandatory)
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No opinion	
European Association of Corporate Treasurers	Yes	Note: confirmation of payment initiation status and/or of payment execution could be less relevant if the legal analysis of an accepted SRTP (EACT comment for CR 4.6) should define that it complies with PSD art. 80 (2).
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.10.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



5.11 # 11: Notification of payment execution

5.11.1 Description

This This change request was provided by EuroCommerce.

It proposes that the Payer RTP PSP provides a notification to the Payee’s PSP of the execution of the payment instruction/initiation, who will inform the Payee of the execution of the payment instruction.

5.11.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF The RTP TF believes that a request for payment initiation status feature could be optional and only applicable to the ‘Accept now/Pay now’ use cases. The Payee would be able to request in the SRTP message a payment initiation (or execution in the case of an Instant Payment) status.

In its response to the SRTP message, the Payer would have the possibility to confirm that the payment is initiated (or executed in the case of an Instant Payment). To demonstrate that the payment is effectively initiated and accepted by its PSP (or executed in the case of an Instant Payment), the Payer would have to provide various payment related information (e.g., the PSP identification, the payment reference).

The RTP TF suggests including the change request in the scheme as an optional feature - (option c).

5.11.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request as an optional feature in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Same as above as an option, but maybe more on a pull mode from the Payee's PSP to the Payer's RTP SP than a push mode from the Payer's SRTP SP. So it would be more like a request (see CR # 10 b) than a notification (already existing in the SCT scheme). This CR is again at the border of (the integration with) the Payment Scheme. It meets the need to get an end-to-end process from RTP to payment.



Contributor	Support	Contributor comments
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No	The CNPS is of the view that such a confirmation could be useful to the payee, especially for delivery versus payment types of businesses.
Spanish Banking Community	Yes	Same than CR #10
German Banking Industry Committee (GBIC)	No opinion	See comments under CR #10.
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No	This change is incorrectly presented. Independently from the fact if it is standard SCT or instant SCT, notification from payer's PSP to payee's provided has to be sent only if payment has been already executed. Simultaneously it has to be indicated that in spite of the fact it is the optional service, notification about executed payment must be sent if sending of this notification was requested from the payee's PSP.
European Association of Corporate Treasurers	Yes	Note: confirmation of payment initiation status and/or of payment execution could be less relevant if the legal analysis of an accepted SRTP (EACT comment for CR 4.6) should define that it complies with PSD art. 80 (2).
Italian Banking Association	Yes	It should be applied also to Approve Later/Pay Now and not only to Approve Now/Pay Now.
Budget Insight	No	In our opinion, the feature would be really useful, it should be added. But not only for Accept Now/Pay Now, but also for all other use cases.
Febelfin	No opinion	
Gini GmbH	Yes	



5.11.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



5.12 # 12: Optional request for a Payment Initiation Status

5.12.1 Description

This change request was provided by Finance Finland/Finnish Banking Community.

It proposes to provide an option for the Payee/Payee's SRTP SP to request for a Payment Initiation Status either within the original RTP message or by a Request for Status Update.

Payment status is required especially for e-commerce/commerce use cases for merchants to be confirmed of successful funds transfer before delivery of goods/services. For smooth customer experience it is required to get the response back the same route to the RTP originator. Normally, the incoming payments monitoring, and reconciliation is done in other parts of the merchant organization or systems, and not in real-time. In addition, when the payment is made by SCT, the funds are not instantly received by the merchant nor credit advice available in advance.

This feature would better connect RTP with the subsequent payment transaction, to close the entire end-to-end process from order to payment. This would also ensure wider usage of the SRTP scheme (especially in e-commerce/commerce). The feature could replace the need for payment guarantee especially in 'pay now' cases.

Payment initiation status should be generated for both successful and unsuccessful payments when requested. It should be generated immediately in 'pay now' cases when the payment is executed successfully or fails. The amount of the successful payment should also be included in the response, together with information on the payment scheme used, as well as the Originator PSP's reference of the SCT (Inst) Transaction message.

If the Payer's RTP SP is a non-PSP, the non-PSP RTP SP could forward the request to the Payer's ASPSP, whenever possible (i.e., the ASPSP is an SRTP participant and supporting the feature), based on Payer's selection/PSP identifier given by the Payer in the SP's UI. A prerequisite most probably is that the Identifier of the Payer is unique and recognizable by the Payer's PSP. If forwarding is not possible, for example, the ASPSP is not an SRTP participant, the Payer could be prompted in the Payer SP's UI to fill in the requested and sufficient information concerning the payment (possibly including the Originator PSP's reference of the SCT Transaction). I.e., the sufficient information on the payment could be provided by the Payer in the RTP response.

As this would be an optional feature, SRTP SPs are not obliged to support it.

The status report (pain.014) should be extended to support optional information on the payment status, amount of payment, payment date, payment scheme, Payer's PSP, and the Originator PSP's reference of the SCT (Inst) Transaction. The possibility to forward the request for payment initiation status should be supported.

5.12.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF The RTP TF believes that a request for payment initiation status feature could be optional and only applicable to the 'Accept now/Pay now' use cases. The Payee would be able to request in the SRTP message a payment initiation (or execution in the case of an Instant Payment) status.

In its response to the SRTP message, the Payer would have the possibility to confirm that the payment is initiated (or executed in the case of an Instant Payment). To demonstrate that the payment is effectively initiated and accepted by its PSP (or executed in the case of an Instant



Payment), the Payer would have to provide various payment related information (e.g., the PSP identification, the payment reference).

The RTP TF suggests including the change request in the scheme as an optional feature - (option c).

5.12.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	See above CR # 10 b and 11 YES for the first part of the CR: "to request for a Payment Initiation Status [...] within the original RTP message". NO for the second part of the CR "by a (Payment) Request for Status Update": not possible before the RTP acceptance and not also possible after a RTP which has been accepted (the RTP lifecycle will be closed)!
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No	The CNPS is of the view that such a confirmation could be useful to the payee, especially for delivery versus payment types of businesses.
Spanish Banking Community	Yes	Same than CR #10
German Banking Industry Committee (GBIC)	No opinion	See comments under CR #10.
EuroCommerce	Yes	



Contributor	Support	Contributor comments
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	It should be applied also to Approve Later/Pay Now and not only to Approve Now/Pay Now.
Budget Insight	No	In our opinion, the feature would be really useful, it should be added. But not only for Accept Now/Pay Now, but also for all other use cases.
Febelfin	No opinion	
Gini GmbH	Yes	

5.12.4 Board decision

The change request is to be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



5.13 # 13: Pre-authorisation or deferred payments

5.13.1 Description

This change request was provided by EuroCommerce.

It proposes to initiate a pre-authorisation or deferred payments service through a RTP message. Support of pre-authorisation of funds, including partial approval, by providing a guarantee of payment to the merchant for a short/medium term reservation of funds.

The payment may be a lower amount to the pre-authorized but also a higher amount, usually up to 15% higher in fresh food e-commerce retail (+/-15% variation)

Additional features are:

- Push reservation service confirmation message to the payer's app
- Update or Cancellation of reservation of funds.

5.13.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF The RTP TF believes that this feature is technically not possible in the existing SRTP scheme and would require the definition of a new process and huge changes. The change request could be submitted again at a next change maintenance cycle.

The RTP TF suggests not taking forward the change request - (option e).

5.13.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to include the change request in the next version (v3.0) of the SRTP scheme rulebook given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	No	Fiserv disagrees that this is a large change to the current scheme. SRTP already supports deferred payment types (SCT, Cheques, etc). The required changes are within the payment schemes - SRTP needs to support the option of pre-authorized payment, amount and duration of funds hold, to allow the payment system to handle a pre-authorized payment.
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This is a payment feature, not messaging. There is already a request for guaranteed payment that can be of use for some cases. Not possible to-day in the RB V3. For the next one (V4)?



Contributor	Support	Contributor comments
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	There is support from French merchants and public administration for this functionality, which should be made available in the medium term. The RTP taskforce should liaise with the SPAA in order to clarify the interplay between the two schemes and the availability of this functionality in the SRTP in the future.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	Could you pls elaborate what is technically not feasible or impossible to the SRTP messaging service as similar service is provided by other payment schemes.
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	No opinion	
Febelfin	No opinion	
Gini GmbH	Yes	We hope we can re-evaluate this feature in the future since there is opportunity for such payment needs. For the time being, we agree on not taking it forward.

5.13.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.14 # 14: SCT reference in the SRTP message

5.14.1 Description

This change request was provided by the MSG MSCT.

It proposes to include a reference to an earlier SCT (instant) instruction (which may or may not be initiated through an RTP message) in the RTP messages DS- 01, DS-02 and DS-03 to allow the linkage between 2 SCT (instant) transactions.

Additional field in the messages DS-01, DS-02 and DS-03, for inclusion of a reference (e.g., the merchant transaction identifier) to an earlier SCT (instant) transaction.

5.14.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that an additional field for a reference can be added. However, it cannot reference a payment because SRTP is not a payment scheme, but the Payee could include a reference to a previous SRTP message.

The RTP TF suggests including the change request in the scheme as an optional feature - (option c).

5.14.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the possibility to include a reference to a previous SRTP message as an optional feature in in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	The reference cannot be to a payment, SRTP is not a payment scheme, but can indeed reference a previous SRTP. Which use cases? And the messaging of such data will only be for information.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	No	Not an SCT reference but a reference to an earlier sent SRTP message.



Contributor	Support	Contributor comments
French National Payments Committee (CNPS)	No opinion	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	No opinion	
EuroCommerce	No	It should be a mandatory feature to be included in the rulebook (option b) to provide comprehensive and transparent information to retail payment end user as per recommendation of ERPB transparency working group.
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
Italian Banking Association	No	We consider that this introduces an additional option to be managed with no real value because it will create a link between two RTP messages (and not two payments).
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.14.4 Board decision

The possibility to include a reference to a previous SRTP message is to be incorporated as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



5.15 # 15: Allow the Payer to ask for changes on amount/execution date/method of payment

5.15.1 Description

This change request was suggested following the 2020 public consultation by the Spanish Banking Community.

It proposes to include the possibility for the Payer to ask for changes in amount/execution date/payment method (even if not allowed by the Payee). In addition, the Payee could allow for earlier but not later payment date in the current scheme.

5.15.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF is of the opinion that this possibility already exists if agreed by the Payee in attribute AT-66. If it is not the case, a bilateral agreement between the Payee and the Payer is required and the original RTP could be cancelled or refused and replaced by a new RTP.

It is technically not possible to include this feature in the SRTP scheme as it would require the definition of a new process and huge changes.

Therefore, the RTP TF suggests not taking forward the change request - (option e).

5.15.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to include the change request in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Either change is allowed by the Payee, and this is already there, or the Payee does not allow changes. In the latter case, it makes little sense to allow the Payer unilaterally change things. The process is then that the Payer should refuse and talk with his Payee that would potentially send a different SRTP with newly agreed changes.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	



Contributor	Support	Contributor comments
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	No	We understand the EPCs point of view, but the request should be read in the context of the RTP Approval. We believe that in the "RTP approval process" this is a functionality that could be incorporated.
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	No	For EACT some levels of flexibility could be given to the Payer by the Payee in the RTP message. This could help SRTP usage in many business models. EACT suggest to further analyse the request for inclusion in a future version of the scheme.
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.15.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.16 # 16: Transparency for retail payment end-users

5.16.1 Description

This change request was provided by the RTP Task Force.

It proposes to include the following additional attributes, in relation with the ERPB report on transparency for retail payment end-users, in the SRTP scheme:

- Commercial trade name of the Intermediary Platform (WHOM)
- Place where the transaction took place (instead of the headquarter of the Payee) (WHERE)
- Commercial trade name as displayed on a website or the name of the online beneficiary’s platform (WHERE)
- Date on which the transaction took place (WHEN).

5.16.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF recommends adding the required new attributes in the SRTP messages.

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

5.16.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme rulebook in the form of a recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	It is the responsibility of the Payee's SRTP Service Provider: during the enrolment and at each RTP presentment.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	



Contributor	Support	Contributor comments
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.16.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.17 # 17: Alignment of all attribute numbers across all rulebooks

5.17.1 Description

This change request was provided by the RTP Task Force.

It proposes to align the attribute numbers across all the EPC schemes (rulebooks and Implementation Guidelines).

5.17.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

5.17.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate the change request in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	"Technical" change.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	Yes	



Contributor	Support	Contributor comments
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
EBA CLEARING	Yes	
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.17.4 Board decision

The change request is to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.18 # 18: Possibility to send a Credit Note with an RTP message

5.18.1 Description

This change request was provided by the Finance Finland/Finnish Banking Community.

It proposes to include the possibility to send a Credit Note in an RTP message.

To support B2B e-invoicing it should be possible to send credit notes in addition to normal invoices by the RTP messages.

Credit note is sent after the original invoice is sent (as an RTP) and there is a reference in the credit note to link it to the previous invoice(s). There may not be any additional invoices from the same Payee to that Payer, but the credit note may be the last “invoice” in that commercial relationship.

The amount of the RTP message could be a negative amount (and/or specific indication for credit note in a separately defined element).

It should be recommended to use structured remittance information when credit note is sent as an RTP message to enable automated reconciliation.

5.18.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

An SRTP message would be sent only for the purpose of a credit note. The amount (AT-04 - Amount of the RTP) would to be set to “0” (zero). And as such, a zero-amount SRTP would be identified as a credit note.

The exact amount of the credit note shall then be indicated in the “Remittance Information/Structured/Referred Document Amount’/Credit Note Amount”, where negative amounts can also be encoded.

5.18.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate this change request as an optional feature in the next version (v3.0) of the SRTP scheme rulebook given that the majority of contributors support the RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française -	Yes	Always at a level of messaging (information).



Contributor	Support	Contributor comments
French Banking Federation (FBF)		
Dutch Payments Association	No opinion	This is not a request for payment. What kind of response of payer do you expect?
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	No opinion	We need additional clarification on what it is a 'credit note' in this context.
German Banking Industry Committee (GBIC)	No	We understand that the possibility to send a credit note by an RTP message can be of benefit. However, its application will most likely be limited to a limited number of scheme participants, limited number of customer segments, and only some customer channels. Therefore, such a feature should not be understood as a "regular" feature to be supported by all participants. We recommend establishing a dedicated AOS for this feature. Therefore we opt for option c), i.e. the change request should be included in the scheme as an optional feature (Each scheme participant may decide to offer the feature to its customers, or not).
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	EACT supports the request evidencing anyway that a RTP should be related by nature to a payment and using it for sending documents without a subsequent payment or messages requiring actions by the Payer's PSP or SRTP Service providers seems conceptually beyond SRTP core scope. For EACT such elements/requests should be managed in a different "environment/scheme".
Italian Banking Association	No	We do not believe that the SRTP scheme is the appropriate instrument to manage Credit Notes. This change request introduces more complexity to a scheme that should be used to request payments.



Contributor	Support	Contributor comments
Budget Insight	No	The possibility to send a Credit Note or a negative amount RTP looks interesting to us. But, the proposed change does not look good in our opinion. We would suggest putting the negative amount directly inside the AT-04 attribute, or to create a dedicated attribute for that. Instead of relying on having a "structured" RemittanceInformation with a special value.
Febelfin	No opinion	
Gini GmbH	Yes	We are glad to see this feature coming into the SRTP scheme. Take into account that independently of the accounting concept used (credit note in this case), the most important feature is the possibility to send money back to the Payer in all contexts, especially B2B and B2C.

5.18.4 Board decision

The change request is to be included as an optional feature in the next version (v3.0) of the SRTP scheme rulebook.



5.19 # 19: RTP Mandates and automatically approval of subsequent RTPs

5.19.1 Description

This This change request was provided by Bits AS (Norwegian banking community).

It proposes to include the usage of RTP mandates in Request-to-Pay. It will support RTPs where the Payer’s RTP SP can accept RTPs on behalf of the Payer based on an electronic consent given by the Payer in the mandate. The Payer’s RTP SP must ensure that the Request-to-Pay is according to the RTP mandate that was accepted by the Payer initially.

The purpose of the change is to support RTP based on mandates and standardise how the parties establish the RTP mandates using existing ISO 20022 message (pain.009-012) to support subsequent payments on a mandate by using RTPs. The RTPs based on mandates needs to support both regular and irregular requests and for fixed or variable amounts. This will support use of RTPs to automatically accept various types of memberships or subscription fees, bills based on consumptions like electricity and other types of use cases agreed between Payee and Payer.

The change will require new attributes and data sets to be included in the SRTP Rulebook (an optional attribute for the identification of a mandate in the pain.013 message and optional data sets to support exchange of mandate initiations, amendments, and cancellations of mandates).

The functionality should be optional for each RTP SP to support.

5.19.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that this change seems to be linked to the SEPA Direct Debit scheme instead of the SRTP scheme, and in addition, it is technically not possible to include this feature in the existing SRTP scheme.

The RTP TF recommends not taking forward the change request - (option e).

5.19.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to incorporate the change request in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	No	Fiserv believes that this is a valuable additional feature for the SRTP scheme and is not linked to the SDD scheme, although provides similar 'approved' payment capability. There are significant advantages to a Push CT capability over a debit



Contributor	Support	Contributor comments
		scheme from the payee perspective. The changes to SRTP would be minimal.
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	SRTP cannot replicate the SDD mandates functioning because it is not a payment scheme (the payer who receives the RTP is not directly debited). As for automatically accepting a SRTP, this is a commercial business between a SRTP SP and his Payer client. Interest for recurring payment but some RTP SP categories (no PSP) cannot deliver a such service (Same Level Playing Field requested).
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No opinion	Some country banking communities are planning substituting on long term SDD with RTP messages supporting mandate management to provide better control and seamless customer experience to end users.
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	
Italian Banking Association	Yes	
Budget Insight	No	This could be needed for a few use cases, like the one of automatically accepting instalments.



Contributor	Support	Contributor comments
Febelfin	No opinion	
Gini GmbH	No opinion	We do see an opportunity to enhance Debit Mandates with SRTP as part of the agreement process, but this would require further evaluation. Hopefully we can re-evaluate this in the future.

5.19.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.20 # 20: Payment guarantee with bilateral or multilateral agreements

5.20.1 Description

This change request was provided by EuroCommerce.

It proposes to enhance the request for payment guarantee service.

When a payment guarantee can be requested in the RTP (AT-93), the Payee and the Payer should have the possibility to indicate either (i) which party is expected to provide this payment guarantee service (Payee’ RTP reference party, payee’s RTP service provider, Payer’s RTP Service provider, PISP,...) or/and (ii) which payment scheme rules will apply for the payment guarantee service. Therefore, the payee and the payer would be able to agree “ex-ante” the service level and the payment scheme rule to apply for delivering the payment guarantee service.

This additional service is an optional service for the payer and payee.

5.20.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that the request for payment guarantee is already included in the SRTP scheme. The Payee and the Payer are free to conclude any bilateral or multilateral agreements about to the provider of the payment guarantee outside the scope of the SRTP scheme. The related applicable payment scheme should be determined outside the scope of the SRTP scheme.

The RTP TF remarked that the existing request for payment guarantee feature could be combined with the request for payment initiation status. Bilateral or multilateral agreements are outside the scope of the SRTP scheme.

The RTP TF suggests not taking forward the change request - (option e).

5.20.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to incorporate the change request in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	Request for guaranteed payment is already there. The implementation of the guarantee itself is out of scope for SRTP (because not a payment scheme) and can only be an external arrangement.



Contributor	Support	Contributor comments
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	No	We think it is necessary additional fields that can describe precisely how to identify a payment guarantee in order to facilitate the Payee or the Payee's PSP to address to the guarantor and to ask for its execution if the payment has not been executed when the time has come.
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	Could you pls clarify where the request of payment guaranty is provided and how it has to be used? The second issue is not on the freedom to conclude bilateral or multilateral agreements but how to technically indicate to a participant that such agreement has been made and the service should be executed. This will trigger the execution of an agreement that has been concluded outside the SRTP scheme. However, the SRTP scheme messaging should be able to passthrough the information.
Vseobecna uverova banka (VUB)	No	In our opinion it has to be described in the Rulebook how to ensure the payment guarantee (that payment from payer's PSP will be unambiguously sent) whereas -in DS-01 is included element for payment guarantee.
European Association of Corporate Treasurers	Yes	EACT believes that including in the RTP messages request for actions by the Payer's PSP o SRTP Service providers seem conceptually beyond STP core scope. For EACT such elements/requests should be managed in a different" environment/scheme".
Italian Banking Association	Yes	
Budget Insight	No opinion	



Contributor	Support	Contributor comments
Febelfin	No opinion	
Gini GmbH	No opinion	

5.20.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.21 # 21: Pre-authorisation

5.21.1 Description

This change request was provided by EuroCommerce.

It proposes to include the possibility for the Payee and the Payer to agree on the purchase of goods and services without knowing the final amount due by the Payer. The RTP rulebook shall support the functionality to request a pre-authorisation to (i) a specific payment service provider or/and (ii) to a specific payment scheme until the final payment amount is defined and paid. The payee and the payer would be able to agree “ex-ante” the service level and the payment scheme rule to apply for delivering the pre-authorisation payment service.

Pre-authorisation of payment: A guarantee of payment whereby a different amount from the RTP amount will be actually paid. In agreement with the Payer and for a limited period of time, a maximum amount can be indicated in the RTP and guaranteed (or “preauthorised”), but on the basis of actual consumption of goods and services, a lower amount may be paid.

5.21.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that this feature is technically not possible in the existing SRTP scheme and would require the definition of a new process and huge changes.

The change request could be submitted again at a next change maintenance cycle.

The RTP TF suggests not taking forward the change request - (option e).

5.21.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to incorporate the change request in the next version (v3.0) of the SRTP scheme given that the majority of contributors support this RTP TF recommendation.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	No	Fiserv disagrees that this is a large change to the current scheme. The required changes are within the payment schemes - SRTP needs to support the option of pre-authorised payment, amount and duration of hold.
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	See above



Contributor	Support	Contributor comments
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	Since this functionality should be included in the SPAA, it does not seem necessary to include it in the SRTP.
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	A pre-authorisation payment service followed with a final payment service is part of the expected payment journey for merchant's customer in many retail markets. Developing such service will be a real value added service for merchants and consumer to foster the usage of SRTP with SEPA (instant) Credit Transfer.
Vseobecna uverova banka (VUB)	Yes	
European Association of Corporate Treasurers	Yes	EACT believes that including in the RTP messages requests for actions by the Payer's PSP or SRTP Service providers seem conceptually beyond STP core scope. For EACT such elements/requests should be managed in a different "environment/scheme".
Italian Banking Association	Yes	
Budget Insight	No	
Febelfin	No opinion	
Gini GmbH	Yes	

5.21.4 Board decision

The change request is not to be incorporated in the next version (v3.0) of the SRTP scheme rulebook.



5.22 # 22: Use of an Alias/Proxy in addition to IBAN as the identifier of the Payee in the RTP message presented to the Payer

5.22.1 Description

This change request was suggested by the Swedish Bankers Association.

It proposes to include the use of an Alias/Proxy in addition to IBAN as the identifier of the Payee in the RTP message presented to the Payer.

It was also requested to add the use of an alias in the next SCT and SCT Inst Rulebooks which cover alias capability in the messages for both the Payer and Payee sides. In addition, it clearly states the rules and responsibilities with regard to the payments. That will make the prerequisites and the delimitations for the responsibilities within the SRTP Scheme very clear. It would be a clear benefit with regard to the added value for participants and their customers in SRTP Scheme to be able to add a dataset/attribute to be able to transport that additional alias data in the SRTP messages.

The contributor suggests including an Alias and a Proxy as optional attributes in the SRTP scheme. The Alias and Proxy do not replace the IBAN but are an addition to the IBAN, at least for the inter-SPs datasets.

5.22.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF remarked that the Payee's identification attribute (AT-24) already exists in the SRTP scheme and could be used to that purpose. Furthermore, the Payee's SRTP Service Provider should have an agreement with the Payee in relation to the treatment and the use of the data provided under such Alias/Proxy.

The RTP TF is of the opinion that this change request is already provided in the SRTP scheme - (option a).

5.22.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to incorporate this change request in the next version (v3.0) of the SRTP scheme rulebook given that the requestor informed that the need is different than what is described in the change request. A new change request should be submitted at the next scheme maintenance cycle.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Swedish Bankers' Association	No	We apologize for unfortunately not being clear enough in the heading of the CR we submitted for the addition of an optional attribute for Alias/Proxy to the next version of the SEPA Request-to-Pay Scheme Rulebook,"CR#22 – Use of an



Contributor	Support	Contributor comments
		<p>Alias/Proxy in addition to IBAN as the identifier of the Payee in the RTP message presented to the payer”. Primarily due to the text in the heading of the CR we can understand why the SRTP TF in its analysis remarked that the Payee's identification attribute (AT-24) already exists in the SRTP scheme and could be used to that purpose and no new attribute is needed, which led to the opinion and result that there wouldn't be any need for our CR, both reflected in the decision minutes from 28th of May and accordingly in SEPA Request-to-Pay Scheme Rulebook, 2022 Change request public consultation document.</p> <p>We would like to clarify that the field (AT-24) refers to Alias/Proxy for the Payee and not Alias/Proxy for the Payee's IBAN which is the change we see would be beneficial to include. These are different things and should be handled in different fields as otherwise it will be difficult to determine what the Alias/Proxy refers to. There may also be situations when you want to use an Alias/Proxy for both the Payee and for the Payee's IBAN, which would then not be possible. The text in the CR heading should have been stated “Use of an Alias/Proxy as a conditional identifier of the Payee's IBAN in the RTP message presented to the payer”.</p> <p>The proposal is to have the Alias/Proxy as conditional to IBAN, i.e., if Alias/Proxy is used IBAN should not be entered and if IBAN is used Alias/Proxy should not be entered. The Alias/Proxy in itself is the key to the IBAN, i.e., which account the payment should be credited to. Only when the credit transfer is to be executed by the payer's bank / PSP, the "translation" of the Alias/Proxy to IBAN will take place. As the payee may change the account that the Alias/Proxy "points to/refers to" after the RTP message has been sent, it is important that there is only one identifier of the payee's account in the RTP message, i.e. either IBAN or Alias/Proxy, in order to get the payment credited to the correct account.</p> <p>As it was decided to include the new attribute, E003 The Proxy/Alias of the account of the Beneficiary (Optional), in the SCT Scheme Rulebook 2023 version 1.0, section 4.5.2 DS-02 Inter-PSP Payment Dataset, our preferred option is to include the same attribute in the SRTP rulebook but as a conditional attribute to IBAN. Then it would be possible for the Alias/Proxy information to be used already from the beginning of the process when the payee sends the RTP message until the end of the process when the payee receives the confirmation of the payment.</p>



Contributor	Support	Contributor comments
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	<p>The same change request is already approved with the migration of the SEPA messages to version 2019 (CR#11 to be sync with the SCT schemes). In any case the IBAN is the only account identifier in the inter RTP SP domain but if we can use a alias proxy in addition of the IBAN it will allow the payee to hide his IBAN to his payer.</p> <p>Given that the Payer will have to pay the Payee by ordering a transfer to the Payee's account, and that the Payee's IBAN (AT-20) is a mandatory attribute of the dataset "DS-03 RTP presentment to Payer Dataset", there isn't any possibility to hide the Payee's IBAN if we don't change the Rulebook and we have to take care not to break the LPF (Level Playing Field) between PSP/TPP and the others participants.</p>
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No	The CNPS would be favourable to creating a registry of proxies for payees' RTP identification numbers (based on trade name for example).
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	
EuroCommerce	No	Please provide a clarification paper how to use IBAN and Proxy
Vseobecna uverova banka (VUB)	No	In the chapter 2.5.1 of the Rulebook, in AT-01 it is unambiguously indicated what has to be included and when. We require to indicate also in AT-24 in an unambiguously way, what has to be included in this attribute (the same way as how it is indicated in AT-01).
European Association of	Yes	



Contributor	Support	Contributor comments
Corporate Treasurers		
Italian Banking Association	Yes	
Budget Insight	No	We think that an optional attribute for a proxy "Alias" for the payer could be good for being more user friendly. This alias could be different of the AT-24 (Payee's identification code) that could be technical, complicated and attributed by the RTP. Also, we would be favourable to creating a registry of proxies for payees' (and payers) RTP identification numbers (based on trade name for example).
Febelfin	No opinion	
Gini GmbH	Yes	

5.22.4 Board decision

The change request is not to be included in the next version (v3.0) of the SRTP scheme rulebook.



5.23 # 23: Enable SRTP SPs to utilise the transactional assets that are currently being defined by the SPAA scheme

5.23.1 Description

This change request was suggested by the SPAA MSG.

It proposes to enable the SRTP Service Providers to utilise the transactional assets that are currently being defined by the SPAA scheme such as 'premium' one-off payment, future dated payment and SPAA recurring payment (the latter is similar to instalments – for which the SRTP has already received a change request - but with further features).

The impact will be on the data exchange between the actors (potentially the aforementioned instruments can be included in an 'envelope').

5.23.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF remarked that the features mentioned in this change seems to be already covered by several above-mentioned separated change requests.

Therefore, the RTP TF recommends not taking forward the change request - (option e).

5.23.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes not to incorporate this change request in the next version (v3.0) of the SRTP scheme rulebook given that more details would be required.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	This looks like a blank request which could have detrimental effects on the Scheme. The SPAA MSG should reword a precise change request if it is needed.
Dutch Payments Association	No opinion	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	No	The CNPS does not understand the EPC TF's response to this CR, which raises the legitim issue of the interplay between the SPAA and the SRTP schemes, and the necessity to avoid any conflicting/competing features.



Contributor	Support	Contributor comments
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	No	<p>We share the SPAA's MSG view that the relationship between the SPAA and the SRTP schemes and possible synergies should be assessed. These synergies could relate to technical questions (e.g., API connectivity), governance aspects (scheme management) or business and remuneration models. The EPC should analyse these aspects; however, this will most likely not lead to a short-term amendment of either the SPAA or SRTP rulebook but should be seen in a broader context. The ongoing SPAA consultation might provide valuable insight for this question.</p> <p>In the CR's current form, we opt for option e (i.e., the change request cannot be part of the scheme for one of the following reasons: direction of CR not feasible).</p>
EuroCommerce	No	Either the Change Request is covered in another CR and should be accepted, or rejection to SPAA request should be explained further.
Vseobecna uverova banka (VUB)	No opinion	
European Association of Corporate Treasurers	Yes	EACT believes that the SRTP should be related by nature to a payment and using it for different purposes seems conceptually beyond SRTP core scope. For EACT such the management of transactional assets different from payments should be managed in a different "environment/scheme".
Italian Banking Association	Yes	
Budget Insight	No opinion	
Febelfin	No opinion	
Gini GmbH	No opinion	

5.23.4 Board decision

The change request is not to be included in the next version (v3.0) of the SRTP scheme rulebook.



5.24 # 24: Update of the Trust & Security Framework

5.24.1 Description

This change request was suggested by the RTP Task Force.

It proposes to review the Trust & Security Framework.

5.24.2 RTP TF analysis and recommendation as input to the public consultation

The RTP TF believes that the Trust & Security Framework should be updated regularly.

The RTP TF suggests including the change request into the next version (v3.0) of the SRTP scheme rulebook - (option b).

5.24.3 RTP TF Change Proposal and public consultation comments received

RTP TF Change Proposal:

The RTP TF proposes to incorporate this change request in the next version (v3.0) of the SRTP scheme rulebook.

Public consultation feedback:

Contributor	Support	Contributor comments
Raiffeisen Landesbank Südtirol AG	Yes	
UniCredit SpA	Yes	
Fiserv	Yes	
Fédération Bancaire Française - French Banking Federation (FBF)	Yes	The joint WB with SPAA will do a good part of this work.
Dutch Payments Association	Yes	
Finance Finland/Finnish Banking Community	Yes	
French National Payments Committee (CNPS)	Yes	
Spanish Banking Community	Yes	
German Banking Industry Committee (GBIC)	Yes	EPC should take the opportunity to reflect in the TSF the emerging market need of using different API standards for the purpose of intra-SP reachability. In particular in Germany, we experience market needs that aim at using the Berlin Group RtP API specification in order to



Contributor	Support	Contributor comments
		enable synergies with other projects and the PSD2 API. The interplay of different API standards and the respective impact on the homologation process should be elaborated.
EuroCommerce	Yes	
Vseobecna uverova banka (VUB)	No opinion	
European Association of Corporate Treasurers	Yes	
EBA CLEARING	Yes	EBA CLEARING supports a continued review of Trust& Security framework, in order to develop the trust and security in the scheme and thus for end-user applications. In this perspective we welcome the extension and clarifications of the obligations of the RTP Service Providers, e.g., regarding the obligation to check account numbers used by Payees as proposed by the RTP TF under CR3. Regarding further enhanced trust as the basis for end-user solutions, liabilities of RTP SP for aspects where they have an obligation (thus including content of the Request, e.g., for the IBAN used) and insurance of their continuously meeting obligations rather than during a one-off homologation might be topics to be considered here.
Italian Banking Association	Yes	
Budget Insight	Yes	
Febelfin	No opinion	
Gini GmbH	Yes	

5.24.4 Board decision

The change request is to be included in the next version (v3.0) of the SRTP scheme rulebook.



6 Change Management Process in respect of minor changes

For this release management cycle, no minor changes had been raised at the start of or during the public consultation.

7 Additional updates

In addition to the aforementioned minor and major changes, there are also a number of editorial updates that will be included in the next version of the SRTP scheme rulebook to provide further clarification, ensure alignment with updated EPC processes or regulations or to correct typos.

All the changes made compared to version 2.1 of the SRTP scheme rulebook will be listed in an annex of version 3.0 of the rulebook.



ANNEX I: List of contributors

Comments were received from the following contributors during the public consultation:

N°	List of contributors
1	Raiffeisen Landesbank Südtirol AG
2	UniCredit SpA
3	Swedish Bankers' Association
4	Fiserv
5	Fédération Bancaire Française - French Banking Federation (FBF)
6	Dutch Payments Association
7	Finance Finland/Finnish Banking Community
8	French National Payments Committee (CNPS)
9	Spanish Banking Community
10	German Banking Industry Committee (GBIC)
11	EuroCommerce
12	Westhafen Expert Dialogue Instant Payments
13	Vseobecna uverova banka (VUB)
14	European Association of Corporate Treasurers
15	EBA Clearing
16	Italian Banking Association
17	Budget Insight
18	Febelfin
19	Gini GmbH