



## Minutes 3<sup>rd</sup> Meeting – EPC Scheme End-User Multi-Stakeholder Group (SEU MSG)

**Meeting Date:** 28 March 2023 – 09H30 – 12H30 CET as Microsoft Teams conference call

**Note:** An overview of the action points from this meeting can be found at the end of these meeting minutes.

### 1. Welcome and approval of the agenda (SEU MSG 001-23)

The EPC Director General Mr E. Goosse as acting EPC co-Chair and the SEU MSG Co-Chair Mr M. Battistella welcomed all meeting participants to the third SEU MSG meeting. The agenda was approved unchanged and can be published on the EPC Website.

### 2. SRTP scheme rulebook versions 2.0/2.1/3.0

### 3. SRTP related API Specifications

### 4. SRTP related API Security Framework

### 5. SRTP Homologation Body

The status about these points were covered in the presentation Pres EPC014-23.

#### 2021-2022 achievements

The version 2.0 of the SRTP scheme rulebook was published in November 2021 and includes new features.

The EPC RTP Task Force (TF) also developed JSON APIs, based on translated XML messages. In parallel, the market can also develop their own SRTP related APIs. The 1<sup>st</sup> version of the EPC's default SRTP API specifications were published in June 2022. As of 30 November 2023, the SRTP scheme participants must be able to at the minimum exchange SRTP messages based on APIs. The SRTP scheme participants are already free to use APIs now (i.e. EPC default APIs or APIs developed by other market players).

The version 3.0 of the SRTP scheme rulebook was published on 24 November 2022 and supports several new features such as among others enrolment and activation processes, redirect option and request for instalment payments.

To complement the 1<sup>st</sup> version of the EPC's default SRTP API specifications, an SRTP related API Security Framework was published on 15 December 2022. This document lists the minimum security-related requirements applicable to the SRTP scheme participants using APIs.

The API Security Framework will become mandatory for all SRTP scheme participants on 30 November 2023, together with the capability to at the minimum use APIs for the exchanges between the SRTP scheme participants.



28 March 2023

With respect to the SRTP homologation process, the EPC appointed an independent homologation body in August 2021. Five different homologation types have been agreed.

Two homologation types have already been launched: i) the Standard homologation, and ii) the Simplified A homologation, for the applicants that have already gone through a relevant formal authorisation/licensing process, and/or are subject to specific regulatory/supervisory requirements. Three other homologation types will be launched by the end of April 2023.

The EPC received five adherence requests so far. To date, two applicants have been successfully homologated and were published in the EPC Register of SRTP Participants. Three other applicants have been duly identified and were sent to the homologation body to proceed with the homologation process.

#### Next steps

A new version of the API Security Framework document including the requirements related to the SEPA Payment Account Access (SPAA) scheme will be published by the end of March 2023.

The RTP TF is working on a new version of the SRTP scheme Clarification Paper based on the version 3.0 of the SRTP scheme rulebook. This version will be published by the end of May 2023.

A new version of the SRTP scheme Risk Management Annex based on the version 3.0 of the SRTP scheme rulebook is being developed. This version should be available by the end of May 2023.

The first part of the SRTP scheme Implementations Guidelines (IGs) was published on 3 March 2023. The second part of the IGs, including the Enrolment/Activation (E/A) optional REDA messages should be published by November 2023.

Consequently, the new version of the EPC's default SRTP related API specifications based on the version 3.0 of the SRTP scheme rulebook and on the IGs should be published by the end of May 2023 for the first part, and by November 2023 for the second part (including the optional E/A messages).

The launch of the following three new homologation types is ongoing:

- Homologation of the Technical Solution Providers;
- Simplified B homologation (for the applicants using a homologated Technical Solution Provider (i.e., a Referenced Technical Solution Provider (RTSP));
- Simplified A+B homologation (for the applicants that are using a RTSP and have already gone through a relevant formal authorisation/licensing process, and/or are subject to specific regulatory/supervisory requirements).

The SRTP scheme participants that would use market APIs would be obliged to ensure at least a translation into the EPC default SRTP APIs when exchanging messages with other scheme participants not using the same type of APIs. These participants must 'understand' incoming EPC default API calls and be able to respond with the EPC default API responses.

The SRTP scheme will now follow a regular maintenance cycle of two years (aligned with the EPC payment schemes' cycles). Therefore, a call for change requests runs until 29 December 2023. The version 4.0 of the SRTP scheme rulebook should be published by the end of November 2024, subject to the approval of the EPC Board.

Finally, In the context of the SRTP scheme and of any EPC scheme that will use APIs, the EPC sees the need for an Operational Scheme Manager (OSM) to ensure the effective functioning of the

**28 March 2023**

scheme. The OSM should play an operational role to enable a smooth and secure functioning of the SRTP scheme when using APIs. To this end, the OSM should collect and make available data about the scheme participants (URL, address, identifier, role...).

The EPC issued a Request for Information (RFI) to find a Directory Service Provider to play the role of OSM. Based on the outcome of that RFI, the May 2023 EPC Board meeting will be presented with a concrete proposal on the way forward regarding the role of OSM for the SRTP scheme and any other EPC scheme that will use APIs.

#### Discussion among MSG members

One MSG member wondered how and when the SRTP scheme would be put up for use towards merchants. The EPC representatives reported a recent announcement by EBA Clearing about an SRTP Proof-of-Concept (PoC) with some interested PSPs. Also, the SRTP scheme starts to get active attention within the Nordic PSP communities. The first Spanish PSPs are expected to adhere to the scheme in the course of 2023.

These first concrete market developments will trigger further interest by other (communities of) PSPs. Each national community will develop its own set of SRTP use cases. The EPC expects that the period of 2023-2025 will experience a significant growth in SRTP scheme adherences. Secondly, the EPC will hold a webinar in the 2<sup>nd</sup> semester of 2023 to highlight the attractiveness, completeness and stability of the scheme.

The SEU representatives welcomed these developments. On the other hand, they see a SEPA-wide reachability of the SRTP scheme as the most critical factor. Corporate payment service users (PSUs) will only use SRTP when they can reach as many as possible customers.

### **6. SRTP scheme roll-out**

#### **A. SRTP adherence status and projections (oral report)**

#### **B. Prospects for and current obstacles to the further use of SRTP by payment end-user groups + possible SEU MSG recommendations (oral report)**

An update and input on these two sub-points had been given under the previous agenda points.

### **7. SCT Inst scheme roll-out**

#### **A. European Commission Proposal on Instant Payments: expected impact on SCT Inst scheme (EPC 083-23)**

The EPC conducted an impact assessment of this European Commission (EC) initiative on the current stipulations of the 2023 SCT Inst scheme rulebook, the related Risk Management Annex (RMA) and Implementation Guidelines (IGs), entering into force on 19 November 2023.

#### Starting point of the SCT Inst transaction processing timespan

The starting point of the proposed 10 seconds timespan is much earlier than what the SCT Inst scheme rulebook stipulates. This would include any transactional sanction screening that some SCT Inst scheme participants may still have to do, a Confirmation of Payee (CoP) check, upfront currency conversions, and other validation services. Furthermore, how should this timespan deal with instant payment (IP) orders having a future execution date and/or time?

The EPC pointed out the consequences of this difference in the concrete starting point for executing IPs between the EC proposal and the SCT Inst scheme rulebook, to the EC for its consideration.



28 March 2023

The SCT Inst scheme also foresees an SCT Inst transaction execution time-out deadline of 20 seconds after the Time Stamp to cover exceptional cases. The EPC asked the EC whether the proposed 10 seconds are the maximum timespan or whether an extra margin of a few seconds would be allowed to cover some exceptional cases (e.g., for a sudden connection or system failure at an actor in the Inter-PSP space).

#### Mandatory reachability

Credit institutions offering regular euro credit transfer services, must also offer instant euro credit transfer services by a certain date. The PSPs concerned must support IP orders as a sending PSP and as a receiving PSP as from two distinct implementation dates.

The SCT Inst scheme rulebook currently sets a minimum reachability obligation for interested PSPs, i.e. the PSPs must support the SCT Inst scheme as a minimum as a Beneficiary PSP.

However, some existing and future SCT Inst scheme participants are not/will not be established in an EEA SEPA country (PSPs based in e.g. AN, CH, MC, SM, UK, UK Crown Dependencies). These scheme participants will not be affected by this dual reachability obligation. Careful re-wording will need to be applied in the SCT Inst scheme rulebook.

#### Sanction screening

The EC proposes that a sanction screening on a transaction-per-transaction basis is no longer necessary for IPs. Instead, the PSPs offering IP services to their customers must do a very frequent screening of their customer databases against EU sanction lists.

This proposal has no impact on the SCT Inst scheme rulebook itself. Regarding the SCT Inst RMA, this new form of sanction screening will impact certain business risks.

Even though at first sight this proposal is a major simplification for sanction screening, there are circumstances where the aimed beneficial effects of this proposal will not be fully reached:

- The existing and future non-EEA SEPA country-based SCT Inst scheme participants may not benefit from this proposed measure;
- Some existing and future EEA SEPA country-based SCT Inst scheme participants will still have to screen on an individual transaction basis due to their licensed financial service offerings in one or more non-EEA SEPA/non-SEPA country jurisdictions;
- Is a daily check of the customer database still necessary when that customer database as well as the EU sanctions lists themselves have not changed since the previous business day?

The EPC sought further clarification about these three bullet points from the EC.

#### Confirmation of Payee (CoP)

The EC proposal on IPs includes a requirement for all PSPs offering the service of IPs in euro, to offer a service enabling customers to be notified when a mismatch is detected between the Beneficiary's name and IBAN, as supplied by the Originator (a so-called Confirmation of Payee (CoP) service).

A mandatory CoP service will certainly impact certain business risks in the SCT Inst RMA. This EC proposal has a potential major impact for the SCT Inst scheme rulebook. There is no such CoP feature within the current SCT Inst scheme rulebook.

The EPC is aware that there are already CoP solutions at the disposal of PSPs in certain countries. It also realises that the current EC legislative proposal on IPs with respect to CoP may still be subject to changes.

**28 March 2023**

The EPC nevertheless considers that it could potentially play a role in the development of CoP services at SEPA level. It currently intends to develop a CoP concept irrespective whether such CoP concept would be:

- Part of the SCT Inst scheme;
- Part of an existing SEPA payment-related scheme (e.g., SEPA Proxy Look-up (SPL), SRTP or SPAA scheme); or
- A new EPC scheme or standard.

Such elaborated concept will be created by a dedicated internal EPC CoP Task Force and if proven feasible and market relevant, it would then be submitted to the market for a three-month public consultation.

The EPC intends to work first on the **'What'** (i.e. the contents) and scope of its CoP concept. Subject to the input obtained from a public consultation and the latest developments of the EC legislative proposal on IPs at a future point in time, the EPC would then finalise its CoP concept and determine the **'How'** of that concept i.e. the appropriate 'instrument' to position this CoP concept in the market.

#### MSG discussion

With respect to the topic on sanction screening, one MSG member reported that some PSPs impose the obligation to conduct sanction screening on corporate PSUs. Such behaviour should be highlighted to the EC. The EPC Director General remarked that the relevant legislations with respect to regulatory screening made it the duty of the PSPs to do such screening.

As for CoP, the EPC Director General stressed that the EPC will only formally launch a CoP feature, option, scheme etc in the event of a demonstrated need from the market that the EPC develops something concrete. At this stage, the EPC has not taken a decision yet whether it will launch something with respect to CoP.

One MSG member reported that the logic is missing to impose the use of CoP for SCT Inst transactions but not for SCT transactions. Another MSG member highlighted that corporate PSUs look for specific counterparty checks before they want to initiate SEPA payments. Examples are a VAT/IBAN check, a check on the SDD Creditor Identifier, a check of the IBAN of the claimed SDD debtor with the name of the debtor-account holder.

#### **B. Adherence status and projections (EPC 037-23)**

The adherences gradually but slowly increase. The SEPA payment scheme adherence ratio between SCT and SCT Inst scheme participants is 61%. This ratio is already 71% when one looks to the eurozone only. In 16 eurozone countries, a majority of payment accounts is reachable for SCT Inst. About 1.000 PSPs in the EEA would still have to adhere to the SCT Inst scheme under the proposed EC legislative initiative. The MSG members had no further comments.

#### **C. Prospects for and current obstacles to the further use of SCT Inst by payment end-user groups (oral report)**

One MSG member highlighted that the main obstacle is currently the SCT Inst scheme reach which the EC tries to resolve through its legislative initiative.

Another MSG member pointed out the privacy of the SCT Inst scheme. In some SEPA countries, the Beneficiary receives via an incoming SCT Inst transaction the IBAN and the name of the Originator. Such information is very valuable for certain criminals. In other SEPA countries, the



28 March 2023

Beneficiary will never get such information. The EPC Director General understood these concerns but their resolution resides beyond the scope of the scheme.

#### **8. How to maintain the SEPA payment schemes future-proof: call for SEU MSG candidates for a multi-disciplinary Work Block (EPC 084-23, EPC 054-23)**

The MSG members received the Terms of Reference of a proposed short-term multi-disciplinary Work Block to determine how to keep the EPC payment schemes future proof in light of recent developments in the payment market environment and of the wider variety of actors playing a role in the payment chain.

Back in the early 2000s, the SEPA payment schemes were built on a basic four-corner model. Now, other market players (marketplaces, Third Party Providers (TPPs) using APIs to access payment accounts, etc) are active as well in the SEPA payment value chain. When payees use a commercial trade name this information needs to be provided alongside their legal name to facilitate reconciliation by the payers. PSUs may wish to transmit more payment-related information in the payment messages for which appropriate scheme attributes are missing.

In a first phase, the Work Block must identify all issues encountered due to the current more complex and longer end-to-end SCT, SCT Inst, SDD Core and SDD B2B payment chains. In a second phase, the Work Block must then determine whether and to what extent the EPC payment schemes can be amended to meet these more complex information needs.

The Work Block is expected to produce a report of recommendations on how to ensure that the EPC payment schemes remain future-proof. Such report should be finalised by the end of September 2023. This report will give the EPC the possibility to agree on rulebook change requests for the 2024 EPC payment scheme rulebook change management cycle or for later cycles.

The EPC foresees up to five representatives from the Scheme Technical Player (STP) MSG and up to five representatives from the SEU MSG, to be part of this Work Block. The MSG members were invited:

- To share their views on issues and topics outlined under section 2 of the document EPC 084-23 and to raise possible other matters that would fit within the scope of the Work Block;
- To express their candidacy to become a member of this Work Block.

The MSG members supported this initiative and had no concrete new issues or topics to report at this stage which the Work Block should investigate.

The MSG agreed to hold a call for candidates among the scheme end-user representatives for this Work Block until Friday 07 April 2023 cob. Interested candidates can appoint one alternate from their stakeholder community in case the MSG members themselves may be unable to attend one or more of these Work Block meetings.

#### **9. Change-over to the 2019 version of ISO 20022 (EPC 087-22)**

##### **A. SEPA-wide downtime on 19 November 2023**

###### Reminder to all stakeholders

All four SEPA payment schemes will migrate to the 2019 version of the ISO 20022 standard-based XML messaging in November 2023.

The EPC reminded all MSG members that the entry-into-force time of the 2023 SCT Inst scheme rulebook is now set at 19 November 2023 at 03H30 CET (instead of 08H00 CET as originally





**28 March 2023**

communicated). This should facilitate a smooth change-over from the 2009 version to the 2019 version of the ISO 20022 standard for XML messages.

This new entry-into-force time will be preceded by a SEPA-wide 30 minutes downtime period from 03H00 CET up to 03H30 CET. During that downtime period, no single SCT Inst instruction, transaction, r-transaction, transaction investigation and any response message related to them will be possible.

Before 03H00 CET, all SCT Inst payment messages will be in the 2009 version of the ISO 20022 standard. As of 03H30 CET, all SCT Inst payment messages will be in the 2019 version of that same standard. The EPC referred to the formal EPC announcement of 27 October 2022 on the EPC website for further details.

The EPC will continue to remind the relevant stakeholders at SEPA level about the upcoming ISO version migration and about the existence of the EPC guidance document [EPC 087-22](#), on a regular basis through the external EPC communication channels and in the relevant external and internal EPC meetings.

#### MSG discussion

Several MSG members explicitly called upon the individual PSPs to actively communicate and discuss this ISO version migration with their relevant corporate customers. Many corporate customers are not aware whether they can continue using their current pain. ISO version messages when initiating SCT and SDD orders as of 19 November 2023, or not. The EPC will escalate this point within the relevant EPC bodies concerned.

To this end-user concern, the EPC message is that as of 19 November 2023, SCT (Inst) Originators and SDD Creditors will still have the possibility to agree with their PSPs either to continue sending their SCT (Inst) and SDD payment files using their existing Customer-to-PSP file set-up (i.e. based on another version of ISO 20022) or to opt for using the EPC specifications for Customer-to-PSP files based on the 2019 version of ISO 20022.

On the other hand, the Originator PSPs and Creditor PSPs concerned must be technically capable of supporting the EPC specifications for the Customer-to-PSP SEPA payment files based on the 2019 version.

#### **B. End-user issues or suggestions to report**

The MSG members did not report suggestions or other issues than those mentioned under point 9.A.

#### **10. Use of structured address as of November 2025: end-user issues or suggestions to report (EPC 153-22)**

##### Reminder to all stakeholders

The EPC reminded all MSG members about its decision in 2022 that only a structured address of the payment service user can be used in SEPA payment messages as of November 2025. This change affects all four SEPA payment scheme rulebooks.

The EPC referred to the guidance document 'Use of Structured Address under the SEPA Payment Schemes as of November 2025' ([EPC 153-22](#)) published on 27 October 2022. It gives scheme participants and PSUs more details on how to prepare themselves for the exclusive use of structured



**28 March 2023**

addresses as of 23 November 2025 being the entry-into-force date of the 2025 SEPA payment scheme rulebooks.

All scheme participants are asked to already inform their customers about this change and to regularly remind them afterwards. This change has a huge impact for various corporate PSUs. They must start upgrading their customer 'static data' repositories so that these repositories can store structured customer addresses by 23 November 2025 at the latest.

The corporate PSUs concerned must also start upgrading their payment and payment-related systems/applications to initiate SEPA payment scheme transactions so that these systems/applications can insert structured addresses from their customer 'static data' repositories by 23 November 2025.

The EPC will continue to remind the relevant stakeholders at SEPA level about the upcoming mandatory use of structured addresses and about the existence of the EPC guidance document [EPC 153-22](#), on a regular basis through the external EPC communication channels and in the relevant external and internal EPC meetings.

#### MSG discussion

Several MSG members explicitly called upon the individual PSPs to actively communicate and discuss this future exclusive use of structured addresses with their relevant corporate PSUs.

Despite the elaborate contents of the EPC guidance document [EPC 153-22](#) (especially the sections 4.1 to 4.4 are relevant for PSUs), many corporate PSUs are not aware as of when exactly they themselves must provide structured addresses. Not all corporate PSUs know in which payment cases an address of the payer or of the payee must be provided. A lot of education and reminders need to be done towards these corporate PSUs.

There is also the fear that especially smaller Enterprise Resource Planning (ERP) software providers offering such services to corporate PSUs are not aware about this major change coming up.

The EPC will escalate these points within the relevant EPC bodies concerned.

### **11. SCT and SDD r-transaction statistics**

#### **A. For the entire year 2022 (Pres EPC005-23)**

The EPC itself observed that the r-transaction rate for cross-border SCT Inst transactions is much higher than for national SCT Inst transactions. The MSG itself had no further comments.

#### **B. Evolution from 2018 to 2022 (Pres EPC004-23)**

The EPC itself observed the following tendencies:

- SCT: overall transaction volume continues to increase with the highest reported volume in five years for the year 2022. The same trend is noted for SDD Core and SDD B2B.
- SCT Inst: overall transaction volume continues to strongly increase year-on-year. Currently, close to 14 percent of the total volume in SEPA credit transfers reported to the EPC concern SCT Inst transactions.

The MSG itself had no further comments.





28 March 2023

## 12. 2024 rulebook change management cycle: suggested changes from SEU MSG members for the EPC to consider (oral report)

The MSG members did not raise any concrete change suggestions.

## 13. Launch of One-Leg Out Instant Credit Transfer (OCT Inst) scheme (Pres EPC015-23)

The March 2023 EPC Board meeting approved the publication of the version 1.0 of the 2023 One-Leg Out Instant Credit Transfer (OCT Inst) scheme rulebook ([EPC158-22](#)), some adjacent documents and a separate Question & Answer (Q&A) document ([EPC 095-23](#)). The EPC published these OCT Inst scheme-related documents on 28 March 2023.

The document Pres EPC015-23 explained in detail during the meeting and the Q&A document [EPC 095-23](#) provide the MSG members with a good insight about the OCT Inst scheme itself and the next steps still to be taken. The next steps with respect to the OCT Inst scheme are:

- 01 June 2023: start of the OCT Inst scheme adherence process.
- End June 2023: publication of the version 1.0 of the Customer-to-PSP and inter-PSP IGs related to the version 1.0 of the 2023 OCT Inst scheme rulebook.
- 28 November 2023: launch of the OCT Inst scheme at 08h00 CET.
- 31 December 2023: deadline for any interested stakeholder to submit change requests to the version 1.0 of the 2023 OCT Inst scheme rulebook.
- Throughout 2024: the OCT Inst scheme rulebook is subject to the 2024 EPC payment scheme rulebook change management cycle together with the four SEPA payment scheme rulebooks.
- End November 2024: the 2025 OCT Inst scheme rulebook and related IGs are published.

## 14. SEPA Proxy Lookup (SPL) scheme rulebook: status (oral report)

Several national proxy lookup services have been launched so far. However, since the launch of the SPL scheme itself in 2019, this EPC scheme has no formal scheme participant at all. Only one institution formally expressed its interest but is not yet registered as a scheme participant. The September 2022 EPC Board meeting decided to maintain this scheme on offer and to keep the SPL scheme-related activities at a low level for the time being.

The renewal of the SPL SPG members was decided by the Board at its 23 November 2022 meeting to evaluate the appetite of the market for the SPL scheme and broaden the SPL SPG's membership to potential scheme participants. The new composition of the SPL SPG was approved by the Board at its 7 March 2023 meeting. The MSG itself had no further comments.

## 15. Re-composition process of the SEU MSG (EPC 085-23)

The SEU MSG and the STP MSG under their current composition had their first meeting in March 2022.

Their Terms of Reference specify that the renewal of the SEU and STP MSG compositions for the respective representatives and the Co-Chairs will be done on a two-year cycle starting from 1 January 2022. The current mandates thus end on 31 December 2023.

The EPC intends to launch the call for candidates for the re-composition of the two MSGs at the end of the Summer of 2023.

## 16. Next 2023 meeting

The SEU MSG agreed to hold its next meeting on 12 September 2023.



**17. AOB**

The EPC Director General will leave the EPC on 31 March 2023 to become an active retiree. He warmly thanked all MSG members for their very much appreciated contributions stressing the importance of the MSG for the EPC.

No other business was reported.

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**List of open action items after 3<sup>rd</sup> SEU MSG Meeting**

| Item | Topic | Action                                  | Owner | Status /<br>Deadline |
|------|-------|-----------------------------------------|-------|----------------------|
|      |       | No open action items identified so far. |       |                      |

List of participants – 3<sup>rd</sup> SEU MSG Meeting

Date: 28 March 2023

| Name                                                     | Institution                | Attendance |
|----------------------------------------------------------|----------------------------|------------|
| <b>Co-Chairs</b>                                         |                            |            |
| Etienne Goose <sup>1</sup>                               | N/A (scheme participants)  | YES        |
| Massimo Battistella                                      | EACT (scheme end-users)    | YES        |
| <b>SEPA scheme participant-related members</b>           |                            |            |
| Begoña Blanco Sánchez                                    | ING                        | YES        |
| Alain Benedetti                                          | BNP Paribas                | YES        |
| Frans van Beers                                          | Dutch Payments Association | Apologies  |
| <b>Representatives of European associations of users</b> |                            |            |
| Birgit Janik                                             | Ecommerce Europe           | YES        |
| Kęstutis Kupšys                                          | ANEC                       | YES        |
| Michel Vanmello                                          | EuroCommerce               | Apologies  |
| <b>Observers</b>                                         |                            |            |
| Claudine O'Connor <sup>2</sup>                           | ECB                        | YES        |
| Katarzyna Kobylinska-Hilliard <sup>3</sup>               | European Commission        | Apologies  |
| <b>Alternates</b>                                        |                            |            |
| Pascal Spittler                                          | EuroCommerce               | YES        |
| <b>EPC secretariat</b>                                   |                            |            |
| Etienne Goose                                            | EPC Director General       | YES        |
| Dominique Allebroeck                                     | EPC secretariat            | YES        |
| Bart Clarebout                                           | EPC secretariat            | YES        |

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<sup>1</sup> Acting co-Chair for the time being

<sup>2</sup> Iddo de Jong as the alternate

<sup>3</sup> The alternate is Steve Ryan