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| EBA Working Group on APIs under PSD2 |
| 18 June 2019 |
| Location: Paris |
| EUROPLAZA, 20 Avenue André Prothin, 92927 Paris La Défense |

EBA Working Group on APIs under PSD2 (WG-API) – 4th Meeting

Agenda

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| Registration and tea and coffee | 09:30 – 10:00 |
| 1. Welcome by the EBA and the EU Commission and update on issues discussed to date   Next planned meeting 3rd week Sep  2 new Q&As published, inc Payment Status | 10:00 – 10:30 |
| 1. Tour de table on update on API development: testing and wide usage   BoI: Low usage of sandbox, only a few TPPs. Focusing on Sep as live date  Nordea: Release new version of API, going live in Sep, released last Fri and waiting for TPP feedback, incl eIDAS validation. Testing progressing well in sandbox. Wide usage not there yet.  BNP: Still has sandbox open, but v low traffic. Half of entities are banks. Progressively going live in next few weeks and expect more traffic on live APIs.  ING: Little movement on dev portal. Live with first accounts in France for last 2m with no interactions. Opening up Lux next.  UniCredit: Live in Czech, Germany, Italy and some other markets now. Intenste testing in sandboxe3sa and 2 TPPs live  HSBC: 200 TPP registered but little usage in test facility. 75k customers using live APIs in UK. Now starting to see PIS too - £5m transacted so far (Transfewuse to top up int payment accounts). Not live in other markets.  Caixa Bank: V low traffic in testing and live  DB: 27 TPPs onboarded in sandbox, 19 Ger, 4 UK, 1 Ire, 1 Swe. Only 1500 requests in May, but good feedback from TPPs. Getting some TPPs asking about limits in PSD2 (e.g. 4 times/day) or blaming DB for not understanding how eIDAS works, and saying this is an obstacle. Live in all (14) countries now.  PayPal: 5 TPPs approaching PP, but non started testing yet. Suspect mainly for AIS  SIBS: 18 ASPSPs in prod since 14 Apr. All successful stress tests in May. 100 domains and 12 entities reg and 3 TPPs live in prod. 15k calls in may in prod.  Redsys: 23 Banks live in May in Spain. No activity in prod as TPPs cant get eIDAS certs. 7k requests in sandbox in Apr, 20k in may. 238 TPPs registered in sandbox (maybe just individual devs) prob around 70 TPPs.  OBIE: only 2/15 QTSPs able to provide certs. 400 participants (c 100 are TSPs) c50m API calls last month – mostly AIS. Seeing some really interesting use cases. Big techs are on the edge waiting to come it, but they want more than PSD2. Focus on helping banks test consistently (testing tool used over 35k times last month) and making sure standards support this starting with API EG recommendations.  BG/NextGen/NISP: Not directly involved in implementation. Reg part of standards delivered (subject to any possible further clarifications). NIPS portal now opened to non NISP members now too.  Polish API: Not involved in implementation. But organising dialogue between ASPSPs and TPPs – forum to exchange info. C600 sandboxes available but v low traffic. No requests to prod interfaces. No TPPs registered in Poland. Some registered in other markets. Lack of terms and details relating to exemption process by NCA. Trying to push for TPPs to test and create additional recommendations for standards to cover issues. In contact with Contamatic? PayU, some other ecommerce players, Token.  Linxo: Have connected 8 APIs, mainly sandboxes. Not got prod certs yet. Testing certs not accepted by banks. Accessed 2 with representative data. Managed to deliver first release and nearly ready to test in prod when get cert. Trying to work out which banks will be live and which will have fallbacks.  Klarna: Tested over 200 APIs across EU. Tried to integrate 90 Sandboxes. Communication with banks taking weeks and support issues taking c2 days. Some do not reply at all. Some only reply feedback when threatened with reporting to regulators. Often feel they are the only TPP contacting banks. Some banks referring to other TPPs (eg Token) but not acceptable, as want to onboard direct and not via one of their competitors. Issues include: Providing redirect only, Only 4 requests per day, Please prove why you want additional data from PSU. Test certs sometimes rejected (as bank hasn’t tested eIDAS certs). One bank only providing lorem ipsum in API responses and were pushed to call @ 150 euro per min. Other banks had documentation not in line with APIs and said will update later. Another big bank didn’t reply after 4 weeks. Lots of tech issues in banks in Netherland and Poland. Some positive from banks in Sweden. All issues reported to NCAs.  Trustly: 15 sandboxes tested last week could only go love with 5 (big differences between test and prod). Some banks decline access even if have a prod cert, due to not having tested first. Lots of issues. All issues reported to NCAs.  Tink: Attempted 120 sandboxes across 12-13 markets. Feedback varies across different banks. 1. Lack of tech readiness of sandboxes and APIs. 2. Are APIs designed to actually meet requirements. 3. Attitude of banks. 1 and 2 – situation quite alarming – being rejected for being foreign (Italy), taking 5-8 weeks to onboard (Spain), authentication journeys where PSU required to input IBAN (Belgium), missing account holder name (all of EU). Half of banks don’t have authentication APIs and authentication missing. Every bank only supports redirect, except UK which does App-App. Re 3, often don’t get responses on issues until threat of reporting to NCAs. On positive note, significant number of banks are welcoming feedback, even if they don’t agree. eIDAS – very few banks have documented how are to be used and very few support in sandboxes. Vast differences in how they are being used – esp QSealC. Enrolment to prod, started on Fri to request prod access to all APIs. Onboarding process varies differently. Mostly this is done by email, sometimes via portal, sometimes via API – so not a stupid question to ask how it works, esp if not documented. None of Swedish TPPs are present on EBA register and this is being used by some ASPSPs to block. Have manged to get an eIDAS cert. But these certs are only valid if the QTSP is NOT accredited with EV – QWACs issued by EV accredited QTSPs will not work (CA browser forum rules prohibit ETSI extensions) – this should be OK after 20 June – but any issued till now should be revoked. Are providing all feedback to ASPSP, their NCA and local NCA.  Bafin: Believe account holder name is ONLY a requirement if TPP can prove there is a requirement for the name?  TPP?: represent both Bank and TPP side. Similar dilemma with the name. Potentially an issue with data protection – e.g. when the PSU is NOT the account holder – as the account holder may not have agreed to share the name with another institution.  Fintronic: Testing sandboxes in Spain. Sandboxes mostly managed by 2 groups and working as expected, but some issues. Only implementing redirect. Don’t know how certs will be used in prod and not clear if will be the same as sandboxes. Also sandboxes have limited data. So expecting to do more testing in Prod.  Budget Insight: Interested in French, Bel and Lux banks. Only a few prod APIs and don’t have any prod certs from QTSP. Also no way to test SCA in sandboxes. Only redirect available and don’t see embedded or decoupled. AIS mostly works in sandboxes, but PIS not well implemented. Issue with EBA register, has the wrong number, which does not match NCA register. Enrolment process is painful – very hard to register their agents on portals. No clear documentation on how fallback will work – suspect will use mainly fallbacks in Sep.  Truelayer: Spending time resolving issue with UK banks – recently issued new versions which broke stuff previously working. Examining readiness across EU, but not spent time on sandboxes as don’t believe they will replicate prod, so will spend effort implementing with prod. Started with one QTSP who didn’t have process - Microsec in Hungary. Switched to Microcert in Portugal which has worked.  Numbers: Actively testing against major Lux and Ger banks. Mainly focusing on Luxhub in Lux – fairly solid in terms of doc and quality, and does allow testing SCA – so should allow testing SCA as it is possible. Testing with ING in Ger. Response from banks good and no long responses. AUTH still pending so not been able to apply for eIDAS. Differences across banks for how they accept test certs.  ???: Seeing 20 TPPs testing intensely in sandboxes with good feedback – including answering letters which are asking for stuff which is not a regulatory requirement – all requirements are provided for. Are also a TPP so recognise there are additional needs (e.g. non PSD2 accounts). Quite good with sandbox and testing with other banks sandboxes with varying degrees of success – can implement at least the main functionality. Live since last Fri with own APIs, but TPPs connecting are not yet ready to go live and only seen one attempted connection.  Ikea: Nothing major to share. Concerned about fragmentation and effect on end users.  ECB: A few TPPs said would prefer to go straight to production – is this true.  Various TPP: Sandboxes must be same as prod to be useful. But if all banks build to same standard, then TPP should only need to use a single (central) sandbox.  Who has prod eIDAS: QSeal (only Tink has one), QWAC (again only one Tink).  CBI: Already in prod, 12 TPPs in testing, 6 are v active with constant exchange and feedback. 1 TPP in prod but only for basic testing and no real usage. Have stress tested platform – agree this is ASPSPs responsibility. QSeals not so much used, but CBI have made it mandatory – is this an obstacle because of market situation?  EBA: Recommend the use of both  DB/Tink: discussion around onboarding – should be automatic in prod. | 10:30 – 11:30 |
| 1. Discussion on issue No. 22: Access to non-payment account information   HSBC/Tink: Potential issue if PSU only gives consent to TPP for some PSD2 accounts and then asks TPP to access non PSD2 accounts – TPP may then inadvertently screen scrape PSD2 accounts but not in a way which complies with PSD2/RTS.  HSBC: They may only get limited data in first instance, but is (for example) balance a problem if TPP has this?  BNP: In France, you have a list of all accounts via Stet API, which is not the case in all markets.  DB: Not required to provide API for non PSD2 accounts. But it is up to responsibility of TPP to access only non PSD2 accounts then via SS - they trust the TPPs.  Numbers: Can TPPs continue to access non PSD2 account via FinTS or will they have to revert to SS?  DB: FinTS should remain unaffected.  FCA: Do we need to also think about non-regulated firms SS to access non PSD2 accounts?  HSBC: This makes it even more complicated.  EBA: Acknowledge but can only supervise PSD2.  Numbers: Trying to make SS work somehow, but is in the banks power to add non PSD2 accounts to APIs – no obligation but would be in everyone’s interest.  Bafin: How will ASPSPs solve problem to distinguish which are payment v non-payment accounts for TPPs.  UniCredit: This is a problem for TPP not ASPSP to sort out.  BNP: Down to TPP to know the law.  HSBC: Would challenge. Inconsistent treatment between banks (even in HSBC, some savings accounts are PSD2 and some are not). So how would TPP know. This problem will arise.  Klarna: Struggling with direct access – have to access account history and identify over time whether it’s a payment account. Also PSU can change name of account, so makes hard for TPPs to know. In some markets credit cards are not being included.  Trustly: If a fallback or exemption revoked, TPP needs to be able to distinguish.  DB: All ASPSP has to do on fallback is identify TPP – requirement is then for TPP.  Trustly: If don’t provide an API or non- exempted, then TPP will use fallback.  Tink: Use dozens of third party services – and API providers need to provide business logic too. In this case, it is not clear what constitutes a payment account – and seeing banks in some markets disabling payment functionality on some accounts so they are not covered by PSD2.  BNP: Stet standard allows all or nothing – TPP gets list of ALL the PSU’s accounts.  Truelayer: One bank in UK has 200 account types – and employees of bank did not know which were in scope of PSD2 – how will TPPs know this across all banks in EU.  Ikea: Information should be provided to TPP so they can inform PSU – and this info seems to be missing.  EBA: See the issue that can’t see from a list of accounts which is a payment account or not. Would HSBC be prepared to document how TPPs could access only payment accounts? Would TPPs have access to all accounts?  HSBC: Would be willing to document which accounts are payment accounts. Within bank’s gift to change this overnight so not reasonable for TPPs to know when changes made, unless doc kept up to date. Would require a separate consent (from GDPR) to allow TPP to access all accounts – these are separate legal instruments so need to be separate consents?  Bafin: Primarily a technical problem as might have 2 different requests – one to API and one to SS. Should be ok to have a single step if clear to the customer.  EC: A good point as to whether a single consent is OK. EU is drafting guidelines on interplay between PSD2 and GDPR – due this summer for consultation – but may well require 2 consents separately.  BOI: Would echo Ikea – most important party is PSU. Don’t understand how documentation would solve this. Relationship between PSU and TPP and for PSU to indicate/select which accounts to be accessed.  Tink: For PFM use case, v difficult to explain to PSUs difference between PSD2 accounts and others.  DB: TPPs been running this business for years, so should know.  BOI: Banks have to communicate clearly with PSUs – had to comply with PSD since 2009 – and T&Cs published which should clarify this.  OBIE: Only bank can know what accounts are in PSD2 and what are not – so they are only ones who can provide this. Would be better to do via API – as PSU don’t read T&Cs. API could allow TPP to access list of ALL PSD2 accounts – so TPP would know when the SS what is not a PSD2 account.  CBI: Recognise the issue, but focus on PSD2 for now. Suggest this is looked at after PSD2 in another phase.  DB: BG standardised for card and savings accounts but may vary by banks as to whether these are payment accounts. Not covered loans etc, but these will be included in future standard.  Redsys: Consensus that cards are not in scope.  Polish: Clear for market there as to what is PSD2.  ECB: Clearly a market matter – being proposed in ERPB working group after Sep – proposed to solve by market and not regulation.  BOI: What is vehicle for security and data protection so banks can share this info.  Ikea: Normally user should know what is a payment account and what is not. But only entity who can help the user is the bank. Bank needs to also provide this info to TPPs to. Users feel that credit card is a payment account – and so there needs to be standard way of dealing with this.  BOI: What is consent mechanism and legal vehicle for banks to share a PSU’s data from non PSD2 accounts with a TPP?  FCA: Easier for PISP services – can PSU make an online payment from the account. But need to be clear on AISP – seem to be different approaches.  EBA: Recognise this is an issue but not sure they can address this, as it straddles the line of PSD2. Maybe a Q&A?  HSBC: Have restricted suggested actions to PSD2 accounts. | 11:30 – 12:30 |
| 1. Discussion on issue No. 23: Sharing of PSU credentials   Caixa Bank: Expecting fraud situation will increase if PSUs encouraged to enter their banking credentials in other sites.  BNP: This is not about all credentials, only knowledge factors. TPP not allowed to have the password in clear text.  Numbers: As there is SCA, there is no problem if TPP takes credentials. We had this discussion months ago.  Tink: Don’t want to handle credentials. App-App and decoupled create journeys with low friction and high conversion. The moment these are available, would move to them. Until then, want embedded.  Trustly: This discussion was had years ago and TPPs are allowed to transmit credentials.  Klarna: Not allowed to store sensitive credentials. But have to be able to transmit them to support embedded. Haven’t seen  OBIE: c80% of UK online customers now bank via mobile apps with biometrics. Many banks now moving away from passwords entirely. Should look to push hard(er) for app-app and also strongly encourage decoupled.  Ikea: Should not transmit credentials in plain text. Biometrics are better. Decoupled is essential for in-store – redirect won’t work.  DB: BG offers 3 different options. Sharing static password not the best idea, esp in conjunction with SCA exemptions for low value payments. BG moving more to decoupled to support use cases.  EBA: Are banks in other markets building App-App? And what about decoupled?  BNP: Will implement App-App asap but don’t consider it is mandatory.  UniCredit: Vast majority of customers not using mobile apps. So focused on redirect. Working on app-app in future.  DB: What is required is using app to auth – so could be either App-App or decoupled. Should be up to each bank.  Caixa: Working on app-app, but only 50% of PSUs, so need another solution and looking at redirect for this.  Polish: App-app is not covered in standard yet, but will be in next version.  Klarna: If >50% then priority should be on app-app as this is majority. See decoupled flow only when across devices.  Tink: Of 100+ banks outside UK, not a single one provides app-app or decoupled, so don’t expect anything for Sep. Lack of any biometric mobile auth is a violation of what PSD2 requires. In general typing in password is a bad practice – so don’t want to see it. | 12:30 – 13:00 |
| Lunch | 13:00 – 13:45 |
| 1. Discussion on issue No. 24: 90 days   BudgetInsight: Demo of re-auth process with 9 screens before redirection back to TPP. Proposal is after first SCA with ASPSP, that TPP can then manage further SCA using FIDO certified app. Would be helpful if EBA could clarify that TPP can have delegated authority to conduct SCA.  Fintronic: One of most important for any final users of aggregation services. Running PFM with 500k users. Average 4 accounts per user. Most PSUs will give up if they have to reauth every 90 days.  Linxo: V important to find a solution  BNP: EBA is pointing to a market solution. But if we want to have law changed, then its another way.  BI: Explanation of the tech flow (see attached).  EBA: What market solutions have been tried.  HSBC: Are TPPs providing indemnity – need to consider unhappy path as well.  CBI: Not just tech, but also a legal matter as ASPSP responsible for unath transactions and fraud. Currently methods like this supported in corp accounts, but under  DB: Regs are clear SCA is by the ASPSP. Don’t see can be forced to outsource to TPP. Not sure FIDO is the right answer, not only way to do it. Makes no sense to standardise if ASPSPs don’t want to provide it.  Fintronic: Trying to get a strong recommendation from EBA – understand this is not an obligation for ASPSPs – and recognise will need to cover responsibilities.  Trustly: One solution is delegated SCA. But another solution is responsibility of any PSP. Potentially an issue if ASPSP delegates to one TPP, then do they have to offer this same SCA method to ALL TPPs.  OBIE: Is it permissible for delegation? Is it permissible to waive the 90 days? Albeit may require contracts between banks and TPPs.  EBA: Not possible to change the law. But understand the question.  DB:  BOI: Is this the same as EBA Q&A - SCA can be delivered by TPP but only with contract in place.  Trustly: In Sweden, banks have BankID, and this needs to be made available to all TPPs. So if bank delegates to any TPP, then this TPP’s SCA also needs to be made available to all TPPs.  FCA: Been having singular discussion in UK. Very sympathetic to problem in principle. Struggled with getting evidence of problem and tying back to policy reason for having the 90 days there (to encourage customers to confirm they do still want that access). How does this deliver the policy intention behind RTS.  Fintonic: User coming back to TPP is showing their intent to continue with service.  DB: Need to consider 2 different use cases.  ING: Surprised about this, as agree with FCA and have implemented a very seamless process.  OBIE: Does policy intention still get met if PSU gives re-auth to TPP or does it have to be with TPP.  ING: 90 days is a compromise. From bank may want to have every day, from TPP want ongoing.  Truelayer: Will discourage users from trying out other apps as the barriers increase for adoption if every app has 90 days re-auth for multiple accounts.  Bafin: For delegated SCA, this would have to be PSD2/RTS compliant. And TPP would need to do SCA every 90 days.  EBA: Will see whether can do anything – not able to change the law, but will current legislation allow this. Maybe clarify via Q&A. | 13:45 – 14:30 |
| 1. Discussion on redirection  * *Issue No. 25: thick redirection* * *Issue no. 26: When does redirection constitute an obstacle?*   Truelayer (issue 26): Only BG Standard allows embedded – all others rely on redirection. Redirection will be a new/breaking UX for existing PSUs who use SS with embedded auth. Recommend requiring ASPSPs to offer embedded and decoupled. This will be incentive for ASPSPs to implement biometrics. In any case, redirection must not have more screens/clicks than direct PSU access.  Numbrs: How does TPP make the case and how is bank required to respond if redirection is an obstacle?  ING: Strong fan of redirect model. Also Dutch market used IDEAL for many years. Conversion rates for non IDEAL users show the same as for IDEAL users. So don’t recognise the threat highlighted.  Tink: Yolt had an interesting summary of how app-app has led to dramatic increase in conversion, and 40-60 seconds less time to authenticate. So this will lead to much higher conversion.  BNP: Stet also supports embedded. Did some work with TPP to explain good redirect. Will publish this soon. What will banks do if redirect is seen as an obstacle, but this is down to SCA – probably go to decoupled, but this is more difficult to implement.  PayPal: All partners are very happy they don’t have to do their own SCA. Recent survey 100% of consumer members support redirection.  DB: Don’t agree that if TPPs use embedded today, that banks have to implement this now. Rather banks have to offer their existing methods of authentication. Had no issues with their planned decoupled from TPPs.  DN Bank: Big fan of IDEAL – and this also supports app-app. If we want to address POS, then there are already solutions in the market (e.g. ApplePay). Variations around basic redirect will meet lots of use cases.  Bafin: Will follow guidelines of EBA, but redirection can be an obstacle. ASPSPs who only do redirection should contact Bafin early as they will give exemption process much more scrutiny.  Trustly: POS solutions will not have a web browser.  Ikea: Trying to do in POS will have to be something else rather than redirection, as seconds is too long. Nordics are compliant because using BankID and decoupled flows. What level of ambition do we want for end user digital enablement?  Numbrs: Want do we do if redirection is an obstacle. What is a good redirection example from Stet and BG? Example of bad redirect would be on a mobile to go to a non mobile friendly auth page.  Tink: When asked users, they said they wanted redirect – this is interesting. In Sweden, users are used to decoupled, and would not vote for this over decoupled. Don’t want to be constrained to banks saying redirect is not an obstacle. Ideal also has smooth mobile journeys which have been optimised. Journeys do need to be optimised, which is hot what they are seeing.  Trustly: See that users prefer embedded, but they prefer decoupled even more. It is impossible to offer payment services with redirect only in some channels so this must be considered an obstacle. Examples would be sitting in car and asking for AIS balance, or paying on AppleTV.  Klarna: Would lose customers in checkout if going via redirect. Seeing with millions of payments. Paypal works well but this is embedded into the merchant websites.  BNP: Could share want a good redirect looks like.  OBIE: Will share our CEGs which show examples of good redirect. And also some real examples.  HSBC: With move to full SCA from Sep, would people still advocate embedded. Appreciate where we are today with embedded. Is it time to move to decopled to fix some of these.  Trustly: In Sweden have had SCA for a while and works with embedded.  BOI: Re POS use cases, banks have been mandated to open up existing solutions – in UK and Ireland this is cards for POS.  Tink: PIS is about moving money from account a to account b. Yes cards do this well. TPPs want to be able to offer these payment types in other channels.  Trustly: The channel is not relevant here.  BOI: POS don’t support credit transfer in Ireland.  Trustly: That is the point – would like to offer this.  Ikea: What matters is to offer what is best for the users. Redirect in store is useless. Decoupled is proven in some countries. Consumer expects to be able to use the same method everywhere. Something to define is what service we want to offer to the user.  Trustly: Some of largest providers of POS devices are keen to push updates to support credit transfer – but these won’t support embedded.  EBA: Understand the problem and will think whether need to provide more clarity. | 14:30 – 15:30 |
| Coffee | 15:30 – 15:45 |
| 1. Discussion on fraudulent access  * Issue No. 27: Vulnerability of attack vectors * Issue no. 28: TPP access and ASPSPs’ fraud levels   DB: Number of issues where buyer and payer could be different. BG standard mandates user’s IP address.  BNP (Stet): Not sure details can be made mandatory, but used by risk engines, so if ASPSP doesn’t get they may require step up auth.  Trustly: Another example where PSU name would be helpful.  OBIE: Standard supports headers which include IP address, MCC, address etc. These are all optional and would encourage all particpants to use these fields.  Truelayer: Have asked ASPSPs in UK what info their risk teams would like. In general didn’t feel they were ready. No standard can tell banks how to manage risk. Banks won’t want to explain to third parties how their risk engines work. MCC is tricky as PISP may not come up with the same MCC as the banks’ risk teams. Is in the interest of all ASPSPs to provide more guidance. Step 1 is having a dialogue – and maybe now is the time. Expecting that some of bigger entities will establish best practices?  Ikea: 3D secure 2.0 has this additional info, but each scheme/issuer has different rules. Important to encourage all TPPs and ASPSPs to use same methods.  Truelayer: OBIE standard include MCC code.  Ikea: MCC is ISO standard so should be common.  Bafin: Would be reluctant to impose anything outside card payments.  ING: Fully supports this.  BNP: Also use this field for AIS to check on 4 times/day.  FCA: If we are bringing in other actors who are not part of orgs who share info, does anyone have any views on whether the way industry is organised as it needs to be to manage these issues?  DB: Today PSUs connect directly. So have to collaborate with TPPs to ensure keep the fraud levels low. Have to see what happens when we are live and whether there are new levels of fraud – will have to act very fast.  HSBC: Would also highlight sanctions and AML regs. But this is much broader and PISP may be carrying out same activities as card companies before. There will new and changing attack vectors.  DB: Suggest ASPSP can block TPPs who are comprised if they het spam/DDoS attacks, and they should also inform the NCA and TPP.  Truelayer: Credits the work of OBIE in developing DMS to allow an exchange of info to help both parties identify the issue and solve. Question for regulator in how they handle any scenarios?  FCA: Might be for regulator. But is industry organised in a way some of the basics of these potential issues can be identified and resolved. People come to OBIE because that’s where standards have been developed, not because its representative of the participants.  EBA: At some point (end this/early next year) the EBA WG will come to an end. Market needs to come together to discuss and find solutions to issues. New market entrants will need to be added to this discussion.  BOI: Do have forums where TPPs and Banks do come together.  OBIE: Provide this service at moment to support resolution of issues. Definitely an ongoing requirement for this service, but not clear who does what in this regard – in UK, any market or across EU.  EBA: Here to get this up and running to make everyone compliant, but then it is BAU. Not certain EBA should play a strong role in BAU. EBA guidelines on fraud reporting applies in 2019. How should learnings be shared with industry. This might be a starting point for something?  Tink: Agree market should sort this out. Incentives from TPPs and ASPSPs to make things work would be very different.  EBA: Point is understood. | 15:45 – 16:30 |
| 1. AOB   Next meeting after summer break – likely end Sep TBC.  ING: To confirm Yolt stats - redirect conversion went up 60% when App-App introduced.  DB: BG have provided 2 examples of fallback solutions – can we get clarity if these examples are OK?  EBA: Have a backlog of issues to deal with – this is one, but not a top priority, as focus is on exemption process. Will not clarify anything in next 6-8 weeks. Fallback is next major thing on EBA mind and will be for next 4-5 months.  Tink: Was tasked by other TPPs to clarify about eIDAS situation. It has effectively not been possible for TPPs to obtain and its now past 14 Jun – does this change anything.  EBA: Doesn’t change anything. Are v concerned and have taken note, and 3 x clarification provided on Fri. Will also make ETSI aware. Can TPPs name the provider where been successful?  Truelayer: Multicert from Portugal  Tink: Multicert from Portugal and Microsec from Hungary – but latter will have to revoke.  All other TPPs not received pro but some have test certs from some via Luxtrust and Microsec.  Trustly: received prod QWAC from ??? not sure has to be revoked though.  BNP: accept route certs from all listed QTSPs.  ASPSPs received from Luxtrust and expecting Quovadis.  Swedish NCA: received lots of questions from QTSPs about registers and EBA register.  EBA: Have provided as much clarification as they can in Q&A. | 16:30 – 16:45 |