

Response template



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Payments Council

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Approved

Response template for the public consultation on the Verification Of Payee (VOP) Scheme Rulebook

1 Introduction

The European Payments Council (EPC) is launching a public consultation on its proposed Verification Of Payee (VOP) Scheme Rulebook (EPC218-23) and the proposed EPC Recommendations for the Matching Processes under the VOP Scheme Rulebook (EPC288-23). The public consultation runs for a 90-calendar day period from 20 February up to and including 19 May 2024.

This proposed rulebook has been developed as an answer to legal obligations outlined in the proposed EU Instant Payments Regulation amending the SEPA Regulation.

All interested stakeholders are invited to participate in the public consultation by including their comments on the proposed VOP Scheme Rulebook and the proposed EPC Recommendations for the Matching Processes under the VOP Scheme Rulebook, in this template and emailing it to change-request.EPC-scheme@epc-cep.eu by 19 May 2024 (midnight Brussels time) at the latest. The EPC will not consider any feedback received after this deadline.

During this public consultation, the EPC will also work out:

- Technical Inter-PSP space specifications for the VOP Scheme based on API technology that makes use of ISO 20022 resource elements.
- Requirements for Directory Service Providers which will store and maintain all required operational data about VOP Scheme Participants. This is to facilitate the interoperability between VOP Scheme-based services offered by VOP Scheme Participants, VOP Routing and Verification Mechanisms (RVMs being e.g., existing solution providers) and any other relevant entities. The managed data concern among others scheme adherence, identification and endpoints about VOP Participants.

In the period from end-May to August 2024, the EPC will then review the feedback received from this public consultation.

The EPC aims to have the formal version 1.0 of the 2024 VOP Scheme Rulebook, the related VOP Scheme Inter-PSP API specifications, and the EPC Recommendations for the Matching Processes under the VOP Scheme Rulebook ready by the end of September 2024. The 2024 VOP Scheme Rulebook itself is expected to enter into force in time to fulfil the EU Instant Payments Regulation (IPR) regulatory obligations, whose relevant deadline is currently foreseen for September or October 2025.



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2 Contributor details

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Confidentiality:

The EPC will publish the received public consultation comments from all contributors including the name of each comment contributor's organisation on the EPC Website.

Please state if you wish the name of your organization to remain anonymous during the public consultation feedback review process and in the published public consultation comments report:

YES

NO



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3 Feedback on the proposed VOP Scheme Rulebook (EPC218-23)

Rulebook section N°	Comment / Proposed new rulebook text (please indicate via track changes)	Reason for change
0.3	'a Payment Account-based Payment within SEPA'	Why introduce a new term while the VOP service described in this VOP Rulebook may only be used for SEPA Credit Transfers and SEPA Instant Credit Transfers?
1.3	<p>Please change the wording in:</p> <p><i>Step 5: the Requesting PSP receives the VOP Response from the Responding PSP. The Requesting PSP Instantly provides the Requester with the VOP Response as provided by the Responding PSP.</i></p> <p>to</p> <p><i>Step 5: the Requesting PSP receives the VOP Response from the Responding PSP. The Requesting PSP Instantly <u>informs</u>provides the Requester <u>about</u>with the VOP Response as provided by the Responding PSP.</i></p>	The Requesting PSP should inform the Requester about the VOP Response as provided by the Responding PSP without having the obligation to provide the full VOP Response message to the Requester as this will often be technically very challenging or even impossible to do so in the payment initiation channel used by the Requester.
1.4	<p>Please change the wording:</p> <p><i>The Scheme allows PSPs in SEPA to offer a SEPA-wide Verification Of Payee service to PSUs who intend to initiate a Payment Account-based Payment to a Payment Account within SEPA. The Scheme can be used when:</i></p> <p>to</p> <p><i>The Scheme allows PSPs in SEPA to offer a SEPA-wide Verification Of Payee service to PSUs who intend to initiate a Payment Account-based Payment to a Payment Account within SEPA. <u>The intended Payment Account-based Payment of the Requester is an SEPA instant credit transfer or a SEPA credit transfer.</u> The Scheme can be used when:</i></p>	Although the term 'Payment Account-based Payment' is explained in paragraph 1.3, it is very important to specify the term in this paragraph, 1.4 Scope , as well.



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<p>1.4</p>	<p>Please change the wording:</p> <p><i>After the Requester has provided the Requesting PSP with the Payment Account Number of the Payment Counterparty, the Requesting PSP Immediately checks the validity of the Payment Account Number and Immediately addresses the VOP Request to the Responding PSP.</i></p> <p>to</p> <p><i>After the Requester has provided the Requesting PSP with the Payment Account Number of the Payment Counterparty, the Requesting PSP Immediately <u>applies all necessary</u> checks the validity of the Payment Account Number and Immediately addresses the VOP Request to the Responding PSP.</i></p>	<p>As it is not clear what exactly is meant by ‘checks the validity of the Payment Account Number’ (just a syntax validation or checking whether the account actually exists?), we suggest to use similar wording which is used in par. 3.4.1, iii: ‘applies all necessary checks of the Payment Account Number’.</p>
<p>2.1</p>	<p>Actor ‘The Requesting PSP’</p> <p>Upon explicit request by the Requester or due to the laws applicable to the Requesting PSP, this Participant must initiate the request to verify these details about the Payment Counterparty as provided by the Requester.</p>	<p>Why would the Requesting PSP be allowed, only upon explicit request by the Requester, to initiate a VOP request? Do we (still) comply with the GDPR if a VOP request is processed upon explicit request by the Requester while there is no legal obligation to do so? A Responding PSP might not be willing to respond to the VOP request and share personal data if it cannot rely on the fact that VOP requests are only initiated once there is a clear legitimate interest.</p>
<p>2.1</p>	<p>Actor ‘The Requesting PSP’</p> <p>The Requesting PSP Instantly sends a VOP Request to the PSP managing the Payment Account of the indicated Payment Counterparty.</p>	<p>Why is nothing mentioned that the Requesting PSP is also the actor who informs the Requester about the VOP Response received from the Responding PSP?</p>



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2.2	<p>Bullet point 3:</p> <p>Between the Requester and the Requesting PSP concerning the products and services to be provided by the Requesting PSP to the Requester and their related Terms and Conditions. Provisions for this relationship are not governed by the Scheme, but will, as a minimum, cover elements relevant to the initiation and execution of an VOP action as required by the Scheme;</p>	<p>Please add that these products and services should at least include the initiation of SEPA Credit Transfer and/or SEPA Instant Credit Transfers.</p>
3.2	Supported VOP Request Types	<p>It is not clear from the text in this paragraph what the different VOP Request Types are. Please explain.</p>
3.6	<p>Figure 3: VOP Process</p> <p>PT-01.01</p>	<p>Why is the term 'IBAN' displayed in PT-01.01 in the diagram (Figure 3: VOP Process (PR-01)) while the term 'Payment Account Number' is used throughout the Rulebook?</p>
3.6, PT-01.02	<p>Please change the wording:</p> <p><i>The Requesting PSP receives the information attributes. It Instantly checks whether the provided information attributes fulfil the execution conditions required by the procedures for an inter-PSP VOP processing under the Scheme and in accordance with the VOP processing conditions of the Requesting PSP. This includes the validation of the Payment Account Number.</i></p> <p>to</p> <p><i>The Requesting PSP receives the information attributes. It Instantly checks whether the provided information attributes fulfil the execution conditions required by the procedures for an inter-PSP VOP processing under the Scheme and in accordance with the VOP processing conditions of the Requesting PSP. This includes <u>all necessary checks</u>the validation of the Payment Account Number.</i></p>	<p>As it is not clear what exactly is meant by 'This includes the validation of the Payment Account Number.' (just a syntax validation or checking whether the account actually exists?), we suggest to use similar wording which is used in par. 3.4.1, iii: 'This includes all necessary checks of the Payment Account Number'.</p>



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<p>3.6, PT-01.07</p>	<p>Please change the wording:</p> <p><i>The Requesting PSP receives the VOP Response from the Responding PSP. The Requesting PSP Instantly provides the Requester with the appropriate matching result (i.e. Match, No Match, Close Match with the Name of the Payment Counterparty, identification code not supported/known by the Responding PSP), or as soon as practicable but only in case the Requester and the Requesting PSP have agreed upfront on another notification timeline.</i></p> <p>to</p> <p><i>The Requesting PSP receives the VOP Response from the Responding PSP. The Requesting PSP Instantly informsprovides the Requester aboutwith the appropriate matching result (i.e. Match, No Match, Close Match with the Name of the Payment Counterparty, identification code not supported/known by the Responding PSP), or as soon as practicable but only in case the Requester and the Requesting PSP have agreed upfront on another notification timeline.</i></p>	<p>The Requesting PSP should instantly inform the Requester about the VOP Response as provided by the Responding PSP without having the obligation to provide the full VOP Response message to the Requester as this will be technically very challenging or even impossible to do so in the payment initiation channel used by the Requester.</p>
<p>3.7.1</p>	<p>Attributes:</p> <ul style="list-style-type: none"> • E005 The identification code of the Payment Counterparty; • E013 The type of the identification code of the Payment Counterparty (E005) • C007 Additional information about AT-C001 sent by the Requester • T014 The Requester's reference of the VOP Request 	<p>These attributes should be optional, as these attributes are optional in the Inter-PSP Space.</p> <p>Providing E013 should be conditional upon providing E005.</p>
<p>3.7.2</p>	<p>Attribute T014 The Requester's reference of the VOP Request</p>	<p>This attribute can only be optional, as consumers will probably never use it. Please add that this attribute is optional.</p>
<p>3.7.4</p>	<p><i>DS-04 PSP-to-PSU VOP Information-Dataset</i></p> <p>Name The PSP-to-PSU VOP information-dataset</p>	<p>Please remove the word 'dataset'.</p>



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<p>3.8.1, AT-E001</p>	<p>Please change the wording:</p> <p><i>The name of the Payment Counterparty (i.e. Payee) as supplied by the Requester whom the Requester intends to transfer Funds to.</i></p> <p>To:</p> <p><i>The name of the Payment Counterparty (i.e. Payee) as supplied by the Requester whom the Requester intends to <u>initiate a Payment Account-based Payment</u>transfer Funds to.</i></p>	<p>The term 'Funds' is not (yet) included in Chapter 6, Defined Terms in the Rulebook.</p> <p>Suggestion to replace 'to transfer Funds to' by 'to initiate a Payment Account-based Payment to'.</p>
<p>3.8.1, AT-C007</p>	<p>A maximum of 140 characters for another account identifier than AT-C001 and being only meaningful to the Requester and to the intended Payment Counterparty.</p>	<p>What is the purpose of this attribute? The VOP Request does not reach the intended Payment Counterparty as it only reaches the Responding PSP. Nor is it a requirement stemming from the Instant Payments Regulation. Please remove this attribute</p>
<p>3.8.1, AT-T014</p>	<p>If no reference is provided by the Requester, this attribute has default value "Not provided".</p>	<p>Is this really required? We prefer to exclude this attribute from the VOP Request message when the Requester has not provided any reference.</p>
<p>3.8.1, AT-R011</p>	<ul style="list-style-type: none"> • Match • No Match • Identification code not supported/known by the Responding PSP 	<p>Please add the value:</p> <ul style="list-style-type: none"> • Match/verification check not possible <p>Please indicate that this attribute is conditional to AT-E005.</p>
<p>4.4</p>	<p>Eligibility for participation</p>	<p>Shouldn't we add a criterium that a Participant must have adhered to the EPC SCT and/or SCT Inst Scheme, except for PIS providers holding the required licences?</p>



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6	Defined terms in the Rulebook Term 'Major Incidents'	Do we need to include this term? In par. 1.4 Scope the following is mentioned: ***** <i>The Scheme provides a messaging functionality.</i> It can only be used to verify the Payment Account Number, the Name of the Payment Counterparty and potentially in addition an unambiguous identification code of the Payment Counterparty prior to initiating a Payment Account-based Payment. It is not a payment means or a payment instrument. *****
6	Defined terms in the Rulebook Term 'Payment Account'	Is this definition in line with the definitions in the Instant Payments Regulation and/or Payment Services Directive?



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4 Feedback on the proposed EPC Recommendations for the Matching Processes under the VOP Scheme Rulebook (EPC288-23)

Section N° of the document	Comment / Proposed new text (please indicate via track changes)	Reason for change

WE THANK YOU FOR YOUR CONTRIBUTION!