# Application form to request an exemption from obligation to set-up the contingency mechanism under article 33(6) of the regulation (EU) 2018/389 (RTS on SCA and CSC[[1]](#footnote-1))

#### Preliminary remarks and general principles

This application form is based on the European Banking Authority Guidelines on the conditions to benefit from an exemption from the contingency mechanism under Article 33(6) of Regulation (EU) 2018/389 (RTS on SCA & CSC) (EBA/GL/2018/07).

It should be completed by credit institutions, payment institutions and e-money institutions offering payment accounts accessible online, who have opted for a dedicated interface to enable secure communication with, and access by, the TPPs to their PSU payment account data and who want to be exempted from the obligation to implement the contingency mechanism (fall back mechanism) as set out in Article 33(6) of the RTS on SCA & CSC.

An ASPSP may decide to have only one dedicated interface for servicing all its customers or separate dedicated interfaces for different customer segments (e.g. retail vs corporate). In the latter case, ASPSPs who wish to be exempted from the obligation to implement the contingency mechanism for each dedicated interface will need to fill in and submit one application form per dedicated interface. The exemption is specific to each dedicated interface.

The CSSF urges each ASPSP who already offers or will offer as from 14 September 2019 (application date of the RTS) payment accounts that are accessible online and **who wishes to be exempted from the obligation to implement the contingency mechanism from 14 September 2019, to submit this application form as soon as possible and no later than 01 May 2019.** The application form should be complete upon submission, except for the responses to questions 4.6.1 and 4.6.2, which should be submitted on 14 July 2019 and updated on 14 August 2019. These questions are related to the three-month period of wide usage of the dedicated interface that should start no later than 14 June 2019. The CSSF cannot guarantee that the forms received after these deadlines will be processed for the date of application of the RTS.

Concerning the ASPSPs who plan to offer payment accounts that are accessible online after 14 September 2019 as from a target “date D” and who also want to be exempted from the obligation to implement the contingency mechanism, the fully completed form (i.e. including answers to questions 4.6.1 and 4.6.2) is to be submitted at least 3 months before the target date D.

Please note that incomplete forms will be rejected.

In addition to the application form, the applicant may provide the CSSF with further information as attachments. In that case, the attachments should be cross-referenced with the number of the questions they relate to and should not exceed the maximum number of words authorised in case of narratives. We encourage the institution to bundle all attachments in one PDF document.

Pages 2 and 3 of this application form should be printed, duly signed by the authorized management, scanned and submitted together with the entire document in word format, together with all the attachments via e-mail to psd2‑exemption@cssf.lu and to the CSSF agent in charge of the supervision of the institution.

Concerning the requests to be exempted as from 14 September 2019,the same procedure should apply for the updates to be provided in July and August 2019 (i.e. the pages 2 and 3 of this application form and only point 4.6 on wide usage)

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| Your internal reference : | *CSSF reference :* |
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#### Identification

* 1. Applicant’s identification

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| 1) Applicant’s corporate name:2) Applicant's identifier assigned by the CSSF:3) Type of institution:[ ]  a) Credit Institution[ ]  b) Payment Institution[ ]  c) Electronic Money Institution[ ]  d) Other *[to be described]*: | *Reserved for the administration* |
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* 1. Group subsidiaries in other Member States

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| 1) Does your institution belong to a Group? [ ]  a) Yes[ ]  b) No2) If you answered Yes to question 1), please list the Group subsidiaries located in different Member States that will use the same dedicated interface (entity name and the country where it is located): | *Reserved for the administration* |
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* 1. Branches

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| Please list all branches of your institution located within or outside the EU (entity name and the country where it is located) and indicate which one (if any) will use the same dedicated interface and benefit from the exemption you are applying for: | *Reserved for the administration* |
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* 1. Name(s) and function(s) of the person(s) in charge of dealing with the application file, and their contact details (email and phone number)

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* 1. Submission date to the administration

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* 1. Please record the filename of any attachments provided to support this request. We encourage you to bundle all attachments in one PDF document. For each question where a description is requested, you could provide it in an attachment

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#### Signature by authorized management

Date:

Name, title and signature:

#### General information regarding the dedicated interface:

* 1. Volume of payment accounts (currently accessible online) exposed via your dedicated interface

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| 1) The account holder is an individual customer (retail or private):1. Number of accounts:
2. Percentage of customers concerned:

2) The account holder is a corporate customer:1. Number of accounts:
2. Percentage of customers concerned:
 | *Reserved for the administration* |
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* 1. Services offered with your dedicated interface

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| [ ]  1) AIS (Account Information Service)[ ]  2) PIS (Payment Initiation Service)*[Either one or both can be chosen, in line with the consultative or transactional online services currently offered to your PSUs]* | *Reserved for the administration* |
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* 1. Which method of carrying out the authentication procedure of the PSU is supported by your dedicated interface (GL 5.1.a)?

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| [ ]  1) Redirection *[Please give a summary of the method (up to 500 words)]*[ ]  2) Embedded *[Please give a summary of the method (up to 500 words)]*[ ]  3) Decoupled *[Please give a summary of the method (up to 500 words)]*[ ]  4) Other *[Please give a summary of the method (up to 500 words)]**[Combination is possible]* | *Reserved for the administration* |
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* 1. According to which standard developed by a `market initiative` did you implement your dedicated interface? (with or without deviation – see point 4.5.4)

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| [ ]  1) Berlin Group (NextGenPSD2)[ ]  2) Open Banking UK[ ]  3) PolishAPI[ ]  4) Slovak Banking API[ ]  5) STET PSD2 API[ ]  6) Other market initiative *[Please describe the standard (up to 500 words)]*:[ ]  7) Your own standard *[Please describe (up to 500 words)]*:*[Combination is possible]* | *Reserved for the administration* |
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* 1. What are your planned dates for:

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| 1) The release of the testing facility as well as the release of the summary of the specifications of the dedicated interface:2) The release of the dedicated interface in production:  | *Reserved for the administration* |
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* 1. Did you plan to full or partially outsource your dedicated interface solution:

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| [ ]  1) Yes[ ]  a) To a group entity *[Name]*:[ ]  b) To a Support PFS *[Name]*:[ ]  c) Other *[Please describe]*:*[Combination is not possible]*[ ]  2) No*If you answered Yes, please note that this outsourcing is considered material. Consequently and in line with the circulars CSSF 12/552 and 17/656 as applicable, you are required to address to the CSSF an outsourcing authorisation request, respectively an outsourcing notification when the service provider is a Support PFS.* | *Reserved for the administration* |
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#### Overall architecture of the dedicated interface

* 1. Please confirm that your dedicated interface meets the legal requirements described in the EBA Opinion by ticking each box.

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| **No.**  | **Article**  | **Requirement**  | **compliance**  | *Reserved for the administration* |
| 12.1  | [PSD2] Art 65, 66, 67[EBA-RTS] Art. 30 | Enabling CBPIIs, AISPs and PISPs to access the necessary data from payment accounts accessible online  | [ ]  Yes |  |
| 12.2  | [EBA-RTS] Art. 30(3)  | Conforming to (widely used) standard(s) of communication issued by international or European standardisation organisations  | [ ]  Yes |  |
| 12.3  | [PSD2] Art. 64(2) [EBA-RTS] Art. 30(1)(c) | Allowing the payment service user (PSU) to authorise and consent to a payment transaction via a PISP | [ ]  Yes |  |
| 12.4  | [PSD2] Art. 66(3)(b), 67(2)(b)  | Enabling PISPs and AISPs to ensure that, when they transmit the personalised security credentials issued by the ASPSP, they do so through safe and efficient channels  | [ ]  Yes |  |
| 12.5  | [PSD2] Art. 65(2)(c), 66(2)(d) and 67(2)(c) [EBA-RTS] Art. 30(1)(a), 34  | Enabling the identification of the AISP/PISP/CBPII and supporting eIDAS certificates  | [ ]  Yes |  |
| 12.6  | [EBA-RTS] Art. 10(2)(b)  | Allowing 90-day re-authentication for AISPs  | [ ]  Yes |  |
| 12.7  | [EBA-RTS] Art. 36(5) | Enabling the ASPSPs and AISPs to count the number of access requests during a given period  | [ ]  Yes |  |
| 12.8  | [EBA-RTS] Art. 30(4)  | Allowing a change control process  | [ ]  Yes |  |
| 12.9  | [PSD2] Art. 64(2), 80(2), 80(4)  | Allowing the possibility of cancelling an initiated transaction in accordance with PSD2, including recurring transactions  | [ ]  Yes |  |
| 12.10  | [EBA-RTS] Art. 36(2) | Allowing error messages explaining the reason for the unexpected event or error  | [ ]  Yes |  |
| 12.11  | [PSD2] Art. 19(6)  | Supporting access via technology service providers on behalf of authorised actors  | [ ]  Yes |  |
| 12.12  | [PSD2] Art. 97(5) [EBA-RTS] Art. 30(2) | Allowing AISPs and PISPs to rely on all authentication procedures issued by the ASPSP to its customers  | [ ]  Yes |  |
| 12.13 18  | [PSD2] Art. 67(2)(d)[EBA-RTS] Art. 30(1)(b), 36(1)(a)  | Enabling the AISP to access the same in-formation as is accessible to the individual consumer and corporates in relation to their designated payment accounts and associated payment transactions  | [ ]  Yes |  |
| 12.14 22  | [EBA-RTS] Art. 36(1)(c)  | Enabling the ASPSP to send, upon request, an immediate yes/no confirmation to the PSP (PISP and CBPII) on whether or not there are funds available  | [ ]  Yes |  |
| **No.**  | **Article**  | **Requirement**  | **compliance**  | *Reserved for the administration* |
| 12.15  | [PSD2] Art. 97(2) [EBA-RTS] Art. 5  | Enabling dynamic linking to a specific amount and payee, including batch payments  | [ ]  Yes |  |
| 12.16  | [EBA-RTS] Art.18(2)(c)(v), (vi), 18(3), 30(2), 32(3)  | Enabling the ASPSP to apply the same exemptions from SCA for transactions initiated by PISPs as when the PSU interacts directly with the ASPSP  | [ ]  Yes |  |
| 12.17  | [EBA-RTS] Art. 4  | Enabling SCA com-posed of two different elements  | [ ]  Yes |  |
| 12.18  | [EBA-RTS] Art. 28, 35  | Enabling a secure data exchange between the ASPSP and the PISP, AISP and CBPII, mitigating the risk of any misdirection of communication to other parties  | [ ]  Yes |  |
| 12.19  | [PSD2] Art. 97(3)[EBA-RTS] Art. 30(2)(c),35 | Ensuring security at transport and application levels  | [ ]  Yes  |  |
| 12.20  | [PSD2] Art. 97(3)[EBA-RTS] Art. 3, 22, 35 | Supporting the needs to mitigate the risk of fraud, having reliable and auditable exchanges and enabling providers to monitor payment transactions  | [ ]  Yes |  |
| 12.21  | [EBA-RTS] Art. 29 | Allowing traceability  | [ ]  Yes  |  |
| 12.22  | [EBA-RTS] Art. 32 | Allowing the ASPSP’s dedicated interface to provide at least the same availability and performance as the user interface  | [ ]  Yes  |  |

#### Compliance with the EBA guidelines on exemption

* 1. **Service level, availability and performance (GL 2)**
		1. Please provide, for the dedicated interface and all PSUs’ interfaces, a synthetic description *[up to 1000 words]* of the service level targets, including but not limited to problem resolution, out of hours support, monitoring, contingency plans and maintenance (GL 2.1):

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* + 1. Please confirm that you have defined at least the following KPIs of the availability of your dedicated interface (GL 2.2):

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| [ ]  1) Uptime per day[ ]  2) Downtime per day | *Reserved for the administration* |
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* + 1. Please confirm that you have defined at least the following KPIs for the performance of your dedicated interface (GL 2.3):

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| [ ]  1) Daily average time taken (milliseconds), per request, *to provide the PISP with the same information on the initiation and execution of the payment transaction provided or made available to the PSU when the transaction is initiated directly by the PSU.*[ ]  2) Daily average time taken (milliseconds), per request, *to provide the AISP with all information from designated payment accounts and associated payment transactions made available to the PSU when directly requesting access to the account information.*[ ]  3) Daily average time taken (milliseconds), per request, *to provide the CBPII and PISP with a ‘yes/no’ confirmation whether the amount necessary for the execution of a payment transaction is available on the payment account of the payer.*[ ]  4) Daily error response rate *- calculated as the number of error messages concerning errors attributable to the ASPSP sent by the ASPSP to the PISPs, AISPs and CBPIIs in accordance with Article 36(2) of the RTS per day, divided by the number of requests received by the ASPSP from AISPs, PISPs and CBPIIs in the same day.* | *Reserved for the administration* |

* 1. **Publication of statistics (GL 3)**
		1. For the purpose of Art.32(4) of the RTS, please confirm by ticking each box below that you intend to publish:

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| [ ]  1) Daily statistics[ ]  2) On a quarterly basis[ ]  3) On the availability and performance of the dedicated interface (GL 2.2 and GL 2.3)[ ]  4) On the availability and performance of each of the interfaces made available to your PSUs for directly accessing their accounts online (GL 3.1) | *Reserved for the administration* |
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* + 1. Please provide the planned date of first publication:

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* + 1. Please provide the URL of your daily statistics publication:

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* 1. **Stress testing of the dedicated interface (GL 4)**
		1. Please confirm that you have processes in place to establish and assess how your dedicated interface performs when subjected to an extremely high number of requests from PISPs, AISPs and CBPIIs, in terms of the impact that such stresses have on the availability and performance of the dedicated interface and the defined service level targets (GL 4.1)

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| [ ]  1) Yes[ ]  2) No | *Reserved for the administration* |
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* + 1. For each undertaken stress test, please:
1. Describe the assumptions used as a basis for stress testing (GL 4.3)
2. Provide a summary of the results of the stress tests (GL 4.3)
3. Explain how any identified issues have been addressed (GL4.3)

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| 1) Capability of the dedicated interface to support access by multiple AISPs, PISPs and CBPIIs:a. Assumptions used as a basis for stress testing *[up to 500 words]*:b. Summary of the results *[up to 500 words]*:c. Issues *[up to 500 words]*: |  |
| 2) Capability of the dedicated interface to deal with extremely high numbers of requests, from PISPs, AISPs and CBPIIs, in a short period of time without failing :a. Assumptions used as a basis for stress testing *[up to 500 words]*:b. Summary of the results *[up to 500 words]*:c. Issues *[up to 500 words]*: |  |
| 3) Use of an extremely high number of concurrent open sessions (i.e. open at the same time) for payment initiation, account information and confirmation on the availability of funds requests :a. Assumptions used as a basis for stress testing *[up to 500 words]*:b. Summary of the results *[up to 500 words]*:c. Issues *[up to 500 words]*: |  |
| 4) Requests for large volumes of data:a. Assumptions used as a basis for stress testing *[up to 500 words]*:b. Summary of the results *[up to 500 words]*:c. Issues *[up to 500 words]*: |  |
| e. Other types of stress test you undertook:a. Assumptions used as a basis for stress testing *[up to 500 words]*:b. Summary of the results *[up to 500 words]*:c. Issues *[up to 500 words]*: |  |

* 1. **Obstacles (GL 5)**

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| 1. Please provide evidence that the dedicated interface does not give rise to unnecessary delay or friction in the experience available to the PSUs when accessing their account via a PISP, AISP or CBPII or to any other attributes, including unnecessary or superfluous steps or the use of unclear or discouraging language, that would directly or indirectly dissuade the PSUs from using the services of PISPs, AISPs and CBPIIs (GL 5.1.b):*Please provide as part of this explanation, a visual representation of the customer journey when a PSU accesses its payment account via a PISP or an AISP (including any authentication steps that take place in your institution’s domain). This representation should include a step-by-step customer journey of obtaining account information and initiating a payment through the dedicated interface compared to the customer journey when the PSU does so through your institution’s directly offered PSU interface(s)*  | *Reserved for the administration* |
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| 2. Please confirm by ticking each box that (GL 5.2):[ ]  a) The dedicated interface does not prevent PISPs and AISPs from relying upon all authentication procedures that you provide to your PSUs.[ ]  b) No additional authorisations or registrations are required from PISPs, AISPs or CBPIIs, other than those imposed in Articles 11, 14 and 15 of the PSD2.[ ]  c) You don’t perform any additional checks on the consent, as referred to in Article 32(3) of the RTS on SCA and CSC, given by the PSU to the PISP or the AISP to access the information on the payment account(s) held with you or to initiate payments.[ ]  d) You don’t perform any check on the consent given by the PSU to the CBPII in accordance with letter (a) of Article 65(2) of PSD2. | *Reserved for the administration* |
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* 1. **Design and testing to the satisfaction of PSPs (GL 6)**

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| 1) Is the summary of the specification of your dedicated interface available on your website, in accordance with Art. 30(3) of the RTS on SCA and CSC (GL 6.4)?[ ]  a) Yes[ ]  b) No2) If the answer to the previous question is Yes, please provide the URL:3) Please confirm that you provide the entire technical specifications, at no charge, upon request by authorised PISPs, AISPs and CBPIIs or PSPs that have applied to their competent authorities for the relevant authorisation.[ ]  a) Yes[ ]  b) No | *Reserved for the administration* |
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| 4) Please provide evidence *[up to 2000 words]* that the dedicated interface meets the legal requirements for access and data in PSD2 and the RTS on SCA & CSC (GL 6.1) with:1. a description of the functional and technical specifications of your dedicated interface, and
2. a summary of how the implementation of these specifications fulfils the legal requirements in PSD2 and the RTS on SCA & CSC

*Where you are implementing a standard developed by a market initiative:** *The description referred to in point (i) may consist in information regarding which market initiative standard your institution is implementing, whether it has deviated in specific aspects from such standard, and if so, how it has deviated and how it continues to meet the legal requirements in PSD2 and the RTS on SCA & CSC;*
* *The summary referred to in point (ii) may include, where available, the results of the conformance testing developed by the market initiative, attesting compliance of the dedicated interface with the respective market initiative standard.*
 | *Reserved for the administration* |
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| 5) Have you engaged with PISPs, AISPs and CBPIIs for the purpose of ‘designing and testing’ the dedicated interface (GL 6.1.b)?[ ]  a) Yes[ ]  b) No6) Please elaborate on your answer above *[up to 500 words]*: | *Reserved for the administration* |
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| 7) Please explain how your testing facility should allow your institution and the authorised PISPs, AISPs, CBPIIs or PSPs that have applied to their competent authorities for the relevant authorization to test your dedicated interface in a secure, dedicated testing environment with non-real PSU data, for the functionalities listed under points a) to g) below (GL 6.5).*[Please provide us with the requested information for each functionality]*: | *Reserved for the administration* |
| a. A stable and secure connection?Please provide a summary of the results of the testing *[up to 500 words]*:How many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| b. Your ability and the ability of authorised PISPs, AISPs and CBPIIs to exchange the relevant certificates in accordance with Article 34 of the RTSHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| c. The ability to send and receive error messages in accordance with Article 36(2) of the RTSHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| d. The ability of PISPs to send, and your ability to receive, payment initiation orders and your ability to provide the information requested in accordance with letter (b) of Article 66(4) of PSD2 and letter (b) of Article 36(1) of the RTSHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| e. The ability of AISPs to send, and your ability to receive, requests for access to payment account data, and your ability to provide the information requested in accordance with letter (a) of Article 36(1) of the RTSHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| f. The ability of CBPIIs and PISPs to send, and yours to receive, requests from CBPIIs and PISPs and your ability to send a ‘yes/no’ confirmation to CBPIIs and PISPs in accordance with letter (c) of Article 36(1) of the RTSHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |
| g. The ability of PISPs and AISPs to rely on all the authentication procedures provided by the you to your PSUsHow many PISPs, AISPs and CBPIIs have used your testing facility (GL 6.6)? Indicate the number of PISPs, AISPs and CBPIIs:What was the feedback you received from PISPs, AISPs and CBPIIs when using your testing facility (GL 6.6)? *[up to 500 words]*:Please describe the issues identified and for each issue, how it has been addressed (GL 6.6) *[up to 500 words]*: |  |

* 1. **Wide usage of the interface (GL 7)**

*[For ASPSPs requesting to be exempted as from 14 September 2019, the information required in this section has to be provided on 14 July 2019 and on 14 August 2019 (updated)]*

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| 1) Please provide a description of the usage of the dedicated interface for the period referred to in letter (c) of Article 33(6) of the RTS (GL 7.1.a)a. Description of the usage *[up to 200 words]*:b. How many PISPs, AISPs and CBPIIs have used the dedicated interface to provide services to your PSUs?- PISPs:- AISPs:- CBPIIs:c. How many requests sent by those PISPs, AISPs and CBPIIs to you via the dedicated interface have you replied to:- Requests sent by PISPs:- Requests sent by AISPs:- Requests sent by CBPIIs:d. Please provide the data referred to under 4.2.1.3) and 4.2.1.4) (daily statistics) for the dedicated interface and each of the interfaces made available to your PSUs: | *Reserved for the administration* |
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| 2) Please select and describe *[up to 500 words]* the channel used for communicating the availability of the dedicated interface for ‘wide usage’ (GL 7.1.b)[ ]  a) Your website:[ ]  b) Social media:[ ]  c) Industry trade bodies:[ ]  d) Conferences:[ ]  e) Direct engagement with known market actors:[ ]  f) Other:*[Combination is possible]* | *Reserved for the administration* |
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* 1. **Resolution of problems (GL 8)**

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| 1) Please provide information *[up to 1000 words]* on the systems or procedures in place for tracking, resolving and closing problems, particularly those reported by PISPs, AISPs and CBPIIs (GL 8.1.a): | *Reserved for the administration* |
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| 2) Please provide explanations *[up to 1000 words]* of the problems, particularly those reported by PISPs, AISPs and CBPIIs, that have not been resolved in accordance with the service level targets (GL 8.1.b): | *Reserved for the administration* |
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#### Annex 1: Glossary of main terms used and links to some texts related to the RTS on SCA and CSC

* **PSP:** payment service provider
* **ASPSP:** account servicing payment service provider
* **AISP:** account information service provider
* **PISP:** payment initiation service provider
* **CBPII:** payment service provider issuing card-based payment instruments
* **TPP:** term commonly used in PSD2-related communication to designate globally the account information service providers (AISPs), payment initiation service providers (PISPs) and payment service providers issuing card-based payment instruments (CBPIIs)
* **SCA:** strong customer authentication
* **PSU:** payment service user
* **Market initiative (EBA guideline 6.2):** A group of stakeholders that have developed functional and technical specifications for dedicated interfaces and, in doing so, have obtained input from PISPs, AISPs and CBPIIs.
* **RTS on SCA and CSC:** Commission Delegated Regulation (EU) 2018/389 of 27 November 2017 supplementing Directive (EU) 2015/2366 of the European Parliament and of the Council with regard to regulatory technical standards for strong customer authentication and common and secure open standards of communication (hereafter referred to as the ‘RTS on SCA & CSC’)
* **EBA Opinion:** [Opinion of the EBA on the implementation of the RTS on SCA and CSC](https://eba.europa.eu/documents/10180/2137845/Opinion%2Bon%2Bthe%2Bimplementation%2Bof%2Bthe%2BRTS%2Bon%2BSCA%2Band%2BCSC%2B%28EBA-2018-Op-04%29.pdf)
* **GL:** Guideline – refers to EBA/GL/2018/07 « Guidelines on the conditions to benefit from an exemption from the contingency mechanism under Article 33(6) RTS on SCA & CSC »
1. Refer to Annex 1 for a glossary of all acronyms and links to official text used in this document [↑](#footnote-ref-1)