

Response template



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Payments Council

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Response template for the public consultation on the SEPA Request-to-Pay scheme rulebook

1 Introduction

The European Payments Council (EPC) is launching a public consultation on the draft rulebook of its new SEPA Request-to-Pay (SRTP) scheme (EPC014-20), **which will run for a 90-day period - from 2 June until 30 August 2020.**

The SRTP scheme, which is based on the RTP specifications document¹ produced by the RTP Multi-Stakeholder Group (MSG RTP), covers the set of operating rules and technical elements (including messages) that allow a Payee (Creditor) to request the initiation of a payment from a Payer in a wide range of physical or online use cases. It is envisaged that the Scheme will evolve further over time to support more elaborated functionalities.

All interested stakeholders are invited to participate in the public consultation by including their feedback (e.g. comments, change requests) on the proposed SRTP rulebook in this template and emailing it to SRTP@epc-cep.eu by 30 August 2020 (midnight Brussels time) at the latest.

The EPC will review all received contributions as from 31 August 2020 onwards with the aim of publishing the formal first version of the SRTP rulebook by end November 2020 on the EPC website (subject to Board approval). The SRTP scheme itself is expected to enter into force shortly after the publication date.

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:

NO

¹ <https://www.europeanpaymentscouncil.eu/document-library/guidance-documents/request-pay-specifications-standardisation-framework>



3 Feedback on the draft SEPA RTP scheme rulebook (EPC 014-20)

Rulebook section N°	Comment / Proposed new rulebook text (please indicate via track changes)	Reason for change
Page 7, section 1.1	<ul style="list-style-type: none"> • Meaning of the acceptance/positive response with regard to payment “certainty” 	<p>EBA CLEARING welcomes that the SRTP RB states what RTP is and what it is not. It further welcomes the indication that the current rulebook is a first version and that the scheme will support more elaborated functionalities as the use of RTP will ramp up and evolve.</p> <p>In this context, it is in particular assumed by EBA CLEARING that future versions of the Rulebook could, in the interest of the SRTP usage take-up and interoperability, ensure that in certain use cases a legal meaning or at least information is attached to the acceptance of an RTP/positive response (DS-07) with respect to the execution of the payment itself. For example, it could be determined what the payer’s RTP Service provider means in PSD2 terms with respect to a possible payment or payment order by providing the RTP positive response to the payee.</p> <p>It is anticipated that depending on the use cases/communities exchanging the SRTP messages, different legal meanings, more or less precise, could be attributed to such acceptance. The rulebook would be pivotal in setting generic features to be used throughout SEPA on this point.</p>



<p>Page 15, PS-01.07R, Negative response.</p>	<ul style="list-style-type: none"> • Complete <i>“In the exceptional case of no response received up to the Expiry D/T, the RTP expires automatically after the timeline defined by the Payee in the RTP message.”</i> • with <i>“Once expiry date/time has been reached, the Payer’s RTP Service Provider will send a negative response to the Payee’s RTP Service Provider”.</i> 	<p>This completion clarifies the obligations of the parties when the Expiry Date / Time reaches its end. It is also in line with the definition of the Expiry Date / Time of the RTP (AT-77), which says that once the Expiry Date / Time has been reached, the Payer’s RTP Service Provider will send a negative response to the Payee’s RTP Service Provider.</p>
<p>Page 16, PS-01.12, Request for Status Update.</p>	<ul style="list-style-type: none"> • Replace <i>“Up to the Expiry Date/Time it is possible for the Payee and Payee’s SP to send a Request for Status Update”</i> • with <i>“Payee and Payee’s RTP Service Providers can send a Request for Status Update if no acceptance, refusal or rejection of the original RTP was received”.</i> 	<p>The proposed change would allow the Payee RTP Service Provider to initiate a Request for Status Update also after the Expiry Date / Time. This may be useful for reconciliation in various exceptional scenarios, i.e. when no reply was received by the Payee’s Service Provider.</p>
<p>Page 25, AT-R5</p>	<ul style="list-style-type: none"> • Replace <i>“Specific reference of the RTP Service Provider initiating the Reject”</i> • With <i>“Specific reference of the RTP Service Provider initiating the Response”</i> 	<p>The attribute R5 is also used in the (optional) Functional Positive confirmation DS-06.</p>
<p>Page 25, DS-05</p>	<ul style="list-style-type: none"> • Add a new optional attribute in DS-05 to transport an URL, if both the Payer SP and the Payee SP support this optional functionality. 	<p>Such an attribute at Scheme level would allow to support use cases like e-commerce, where the identification of the Payer is done via a flow which is more distinct than the generic SRTP flow, and this specific flow requires the creation of an URL by the Payer SP and its insertion in the Functional positive confirmation message. The URL will then be forwarded by the Payee SP to the Payee, and the Payee will present it to the Payer, who will be redirected to its online banking and see the prefilled payment order. Even if e-commerce use cases are foreseen to be included in the next RB version, it</p>



		would be of value to add this optional element already from November 2020.
Page 35, AT-01, Identifier of the Payer.	<ul style="list-style-type: none"> • Replace <i>“The Identifier of the Payer to be debited for the credit transfer instruction. This could for example be an IBAN, alias, token or proxy.”</i> • with <i>“The Identifier of the Payer to be debited for the credit transfer instruction. This must be an IBAN, or - if this option is supported by both the Payer’s and Payee’s RTP SP – an alias, token or proxy.”</i> 	The proposed reformulation aims to clarify that besides an IBAN, other options to identify the Payer may exist, but can only be offered if supported by both involved RTP Service Providers. The ultimate goal of this reformulation is to avoid rejections deriving from the usage of other identifiers not supported by the Service Providers.
Page 40, AT-66 and AT68	<ul style="list-style-type: none"> • Complete the definition of AT-66 Changeable amount and AT-68 Accepted modified amount with the clarification that this is an optional functionality which will be offered only if both the Payer Service Provider and the Payee Service Provider support it. 	The objective of this proposal is to avoid rejections deriving from the usage of this functionality when it is not supported by the Service Providers.
Page 42, AT-78, Attachment sent by the Payee to the Payer in the RTP.	<ul style="list-style-type: none"> • Reference is made to the following sentence from the SRTP Rulebook: <i>“The market is invited to share its views on including a URL as an alternative to an attachment. A URL (from which a doc. could be downloaded) can be populated in a pain.013 message”</i>. The proposal is to support the inclusion of the URL in the pain.013 message as an alternative to an attachment, if the involved RTP Service Providers support this option. 	The optional inclusion of a URL in the pain.013 as is considered of value by our users and should be offered only if the involved RTP Service Providers support this option.
Page 45, AT-R5, Name	<ul style="list-style-type: none"> • Replace <i>“Specific reference of the RTP Service Provider initiating the Reject”</i> • With <i>“Specific reference of the RTP Service Provider initiating the Response”</i> 	The attribute R5 is also used in the (optional) Functional Positive confirmation DS-06, which is not a Reject message
Page 45, AT-R5, Description	<ul style="list-style-type: none"> • Replace: all “Reject” • With: “Response” 	The attribute R5 is also used in the (optional) Functional Positive confirmation DS-06, which is not a Reject message



<p>New elements in the SRTP RB, currently missing</p>	<p>Reconciliation between RTP and the resulting payment.</p> <p>The proposal is that in addition to the <i>RTP Remittance Information</i> to be inserted in the payment (AT-05), also <i>the Payee’s end-to-end reference of the RTP</i> (AT-41) and the <i>Payee’s SP reference</i> (AT-63) are indicated as information to be taken over from the RTP into the payment. This would already help to facilitate the reconciliation for all involved parties. It would also ensure a proper reconciliation solution as of November 2020, and until it will be complemented by the implementation of specific requirements for the payment scheme participants to take over such data in their SCT/SCT Inst payment messages (reference is made to the change request CR 27 for the SCT and SCT Inst Rulebooks).</p>	<p>The proposal aims to determine elements that will be used by various parties in the chain for reconciliation reasons. Besides the initiative to include a specific element in the SCT / SCT Inst Rulebook as of 2021, a solution which allows the reconciliation between a request to pay and the resulting payment would need to be in place as of November 2020.</p>
<p>New elements in the SRTP RB, currently missing</p>	<p>Response time Service Level.</p> <p>The proposal is to include service levels for the “Instant” response time in the cases where a Confirmation (PS-01.05C) is requested by the Payee / Payee RTP Service Provider (e.g. a maximum response time by the Payer RTP SP of 5 secs) and to detail the consequences if no Confirmation is received from the Payer RTP SP within such time (e.g. rejection). It is proposed to apply the same approach for the instantaneous reply to a Request for Cancellation (DS-10/DS-11), where if there is no answer of the Payer RTP Service Provider within a defined period of time (e.g. 5 secs), the Request for Cancellation would be timed out.</p>	<p>This proposal aims to ensure timely replies for real-time scenarios also in exceptional situations. The introduction of such response time service levels/possible time-out in the Rulebook would cover also situations when the exchange of request to pay messages takes place between interoperable routing mechanisms.</p>
<p>New elements in the SRTP RB, currently missing</p>	<p>Use cases where the flow deviates from the SRTP generic flow</p> <p>We refer to the Rulebook scope, where it is stated that the SRTP Scheme will evolve further to support more elaborated functionalities. There is a number of possible use cases of SRTP for which it should be possible to introduce certain deviations from the generic RTP flow (see examples on the right). Support from the scheme to develop such variations would be</p>	<p>This would ensure compliance of certain optional solutions such as use cases when the Confirmation (PS-01.05C) and the Positive response (DS-07) are not required in a positive flow, or when the Request is followed directly by an SCT Inst.</p>



	<p>beneficial to the overall take-up of the scheme, subject to compliance with competition and interoperability considerations.</p> <p>The proposal is to include an interim solution to cover such deviations from the Scheme activation date by either extending the definition of the Additional Optional Services (AOS) to include such flows which deviate from the generic message flow or, alternatively, to add a sentence after the description of the generic flow that “deviations from this flow are acceptable if these are justified by the business needs and supported by the Payee SP and the Payer SP”.</p>	
<p>New elements linked to the SRTP RB</p>	<p>Publication of list of SRTP-compliant routing mechanisms</p> <p>For its payment schemes, the EPC publishes on its website a list of Automated Clearing Houses (ACHs) which have declared being SEPA Scheme compliant CSMs. This has served both the interoperability between routing mechanisms and the development of the respective SEPA schemes. For the same reasons, EBA CLEARING proposes that the EPC undertakes a similar publication with respect to routing mechanisms that wish to disclose their compliance with the future SRTP scheme.</p>	