

Euro Retail Payments Board (ERPB)

Interim Report of the ERPB Working Group on Access and Acceptance of Cash

ERPB Meeting 28 June 2021



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1 Introduction

In November 2020, the ERPB expressed the view that access to and acceptance of cash is a relevant concern and may become a crucial issue in the light of developments driven by the coronavirus (COVID-19) pandemic.

To that end, a working group was set up in February 2021 with the participation of relevant stakeholders, and to which also some relevant third parties were invited as per the mandate. The working group is invited to prepare a report summarising the stock take, their analyses and key findings regarding access to and acceptance of cash and the respective conditions thereof, including the following:

1. Overview of the factors influencing the bank branch and ATM networks (credit institutions and, where applicable, IADs) and description of possible future initiatives how to avoid cash supply deficits, for example in rural areas;
2. Overview of various initiatives aiming at ensuring adequate cash withdrawal and lodgement facilities, especially for smaller and medium sized enterprises (which usually do not contract CITs to take care of cash lodgements/withdrawals and need to rely on “local” cash services);
3. Overview of obstacles regarding the acceptance of cash and initiatives aiming to ensure acceptance of cash also in the future; and
4. Overview and evaluation of alternative ways where other actors (e.g. retailers, post offices) could offer services to provide access to cash (i.e. cashback, cash-in-shop etc.), including possible obstacles hindering such cash services.

Based on their initial findings of the stock-take exercise, the working group may identify gaps not yet addressed and deserving further investigations.

The working group shall deliver its report to the ERPB by November 2021.

The present document is a voluntary interim report from the working group to update the ERPB on the process set up and progress achieved so far.

2 Approach taken

Following its inception, and taking advantage from the fact that under current circumstances meetings could only be held virtually, the working group decided to convene on a bi-weekly basis for two-hour virtual meetings. During the first meeting of the working group it was decided to establish four workstreams, each tasked with focusing on one of the four aspects mentioned under Deliverables in the mandate for the working group. These workstreams were composed by volunteering working group members, and participation was also opened to other representatives from the various associations that participate in the working group, on the one hand to divide the work and on the other hand to be able to tap into as many brains as possible. Each workstream designated a Facilitator and a Secretary, and all workstreams were invited to create their own planning. The composition of the working group is contained in Annex 1, the mandate of the working group is contained in Annex 2, and the composition of the workstreams is contained in Annex 3 of this interim report.

The work of the working group is divided in four phases:

- Phase 1: Data collection (March – May);
- Phase 2: Analysis by workstreams of received input, drafting of stocktake, keys findings and gaps identified for each of the 4 topics mentioned in the WG mandate (June – August);

- Phase 3: Drafting of final working group report, key findings and gaps identified (September – Mid-October);
- Phase 4: Validation and sending of final report and its annexes to ERPB secretariat (by end of October).

In their bi-weekly meetings, the working group receives progress updates from the four workstreams and provides steering to identify and avoid possible overlaps and duplication of work between workstreams. This interim report was finalised early at the end of phase 1. What follows is an update on the progress achieved so far.

Phase 1: Data collection

All four workstreams decided that they needed input from various market stakeholders as part of their stocktaking exercise and defined the questions they wanted to address to specific stakeholders. It was agreed that while the stocktake exercise should cover countries in the euro area, interesting examples from other countries including from outside the EU could be collected as well to illustrate possible solutions for the future.

The questions developed by the workstreams and approved by the working group were divided into nine stakeholder-specific questionnaires, addressed to the Eurosystem national central banks, commercial banks, retailers, payees, PSPs and FinTechs, consumers, independent ATMs developers, Cash-in-Transit companies and national postal services. The table with all questions, including an indication of which workstream raised the question and to what stakeholders the question is targeted at, can be found in Annex 4. In parallel, the workstreams were encouraged to start collecting information on the topics allocated to them and discuss possible issues. A state of play for each of the workstreams can be found in the next section.

In terms of process, the working group envisioned a two-stage approach for phase 1 (data collection). First, the nine stakeholder-specific questionnaires were sent during the week 16 to some 20 identified Level 1 Stakeholders (European networks involved in the WG, a few additional ERPB members which are not in the working group and a few relevant third parties). Level 1 stakeholders were encouraged to consult their members and relevant external entities/experts, identified as Level 2 Stakeholders. The Level 1 Stakeholders were asked to consolidate the feedback received from their Level 2 Stakeholders before returning their consolidated response to the working group secretariat by 31 May 2021. The ERPB Secretariat kindly assisted in the send-out of the relevant questionnaires to some ERPB members which are not involved in the WG and the national payment committees. Having substantial aggregated input from Level 1 and Level 2 stakeholders, complemented by data from national payment committees should ensure sufficient level of information for further analysis.

While waiting for Level 1 stakeholders to return their compiled responses to the WG, workstreams were invited to join the WG meetings where some specific stakeholders were invited to make a presentation on an issue of relevance to more than one workstream, and all participants could engage in the discussion and share news/issues with the WG.

3 State of play per Workstream

Apart from drafting the questionnaire, the workstreams started analysing the issues allocated to them and had some preliminary discussions, too. A short summary of the state of play in each workstream is presented in this section of this interim report.

3.1 Workstream 1

Workstream 1 is tasked to provide an overview of the factors influencing the bank branch and ATM networks (credit institutions and, where applicable, IADs) and description of possible future initiatives how to avoid cash supply deficits, for example in rural areas.

During the period covered by this reporting period, the workstream met seven times in-between working group plenary meetings. WS1 discussed in detail the questions they wanted to ask to stakeholders and identified some overlaps with other workstreams, including on national legal frameworks that may impose some minimum geographical coverage for ATMs/bank branches and/or provide an interpretation of the euro legal tender. The ECB may share information about the legal developments related to the fees applied for ATM withdrawals.

The workstream participants also defined the process and milestones for their workstream and clarified how the task of analysing the collected input (phase 2) and how the draft the workstream report to the working group (phase 3) should be shared among the workstream members.

3.2 Workstream 2

Workstream 2 is tasked to provide an overview of various initiatives aiming at ensuring adequate cash withdrawal and lodgement facilities, especially for smaller and medium sized enterprises (which usually do not contract CITs to take care of cash lodgements/withdrawals and need to rely on “local” cash services).

During the reporting period, the workstream started by listing all initiatives aiming at ensuring adequate cash withdrawal and lodgement facilities, that are known to the workstream members. The group then worked on a classification of these initiatives: some can be non-regulatory driven (for example ATM pooling in some countries reflects a collaboration between banks on a voluntary basis) others stem from regulation (for example obligations imposed to banks in order to provide adequate cash facilities) or have a “soft law” origin (like central bank-led initiatives, or resulting from discussion bodies with various stakeholders). This main classification can be further divided into sub-categories in function of the type of initiative (addressing availability of cash, addressing access to cash are addressing general cash issues). The workstream members then focused on the drafting of the relevant questions for the working group questionnaire to stakeholders.

3.3 Workstream 3

Workstream 3 is tasked to provide an overview of obstacles regarding the acceptance of cash and initiatives aiming to ensure acceptance of cash also in the future. During the reporting period, workstream 3 decided to divide its work on obstacles in two streams: why consumers are reluctant to use cash and why payees (not only retailers) are reluctant to accept cash. Some subjects are common to the payers and the payees, such as health, safety and convenience (the one and two cents coins). Some are of course limited to the payee side, such as management and transportation.

The workstream began also to analyse some legal rules which can be obstacles, such as the interpretation and implementation of the legal tender concept or upper limits for cash payments.

3.4 Workstream 4

Workstream 4 is tasked to provide an overview and evaluation of alternative ways where other actors (e.g. retailers, post offices) could offer services to provide access to cash (i.e. cashback, cash-in-shop etc.), including possible obstacles hindering such cash services.

During the period covered by this reporting period, the workstream met seven times, alternating with the working group plenary meetings. The workstream started with a detailed discussion on the appropriateness of the definitions of 'cashback' and 'Cash-in-Shop' that are currently available (e.g. the Eurosystem definition), to be used by the workstream. These terms being used sometimes to refer to different situations than the ones defined by the Eurosystem, the workstream agreed that relevant stakeholders should be asked whether new definitions are required in order to better reflect these services.

The workstream identified a key missing stakeholder: postal services and invited PostEurope, an umbrella organisation representing national Post Offices in the European Union, to join the workstream and the working group. PostEurope made a presentation to the workstream on 21 April 2021 and committed to respond to their specific questionnaire. The ECB asked the Eurosystem members who agreed to share their aggregated data on the legal developments/framework on cashback/cash-in-shop with workstream.

The workstream participants set up their process and milestones, and agreed on how to share the task of analysing the collected input (phase 2) and draft the workstream report to the working group (phase 3) within the tight deadline.

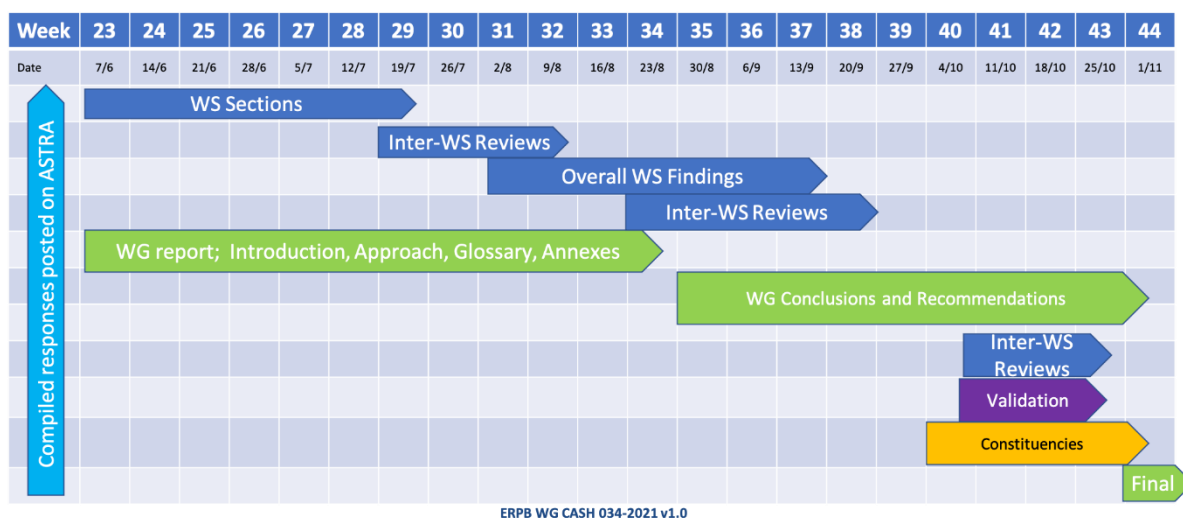
4 Current Status, Next Steps

At time this interim report is finalised, Phase 1 is just completed and the workstreams are starting phase 2 (analysis of received input and drafting of their respective stocktake, key findings and recommendations). Phase 2 includes a bit of flexibility for summer breaks.

16 compiled responses have been received from the following Level 1 stakeholders: AGE, ATMIA, BEUC, EACB, EBF, ECPA, ECSG, EDPIA, EPC, EPIF, ESBG, ETPPA, EuroCommerce, EVA, Western Union (reaching out to their agent network), and from National Authorities. Around 100 Level 2 stakeholders provided input to their Level 1 compiled answer and answers cover 23 countries (Austria, Belgium, Croatia, Cyprus, Denmark, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Slovakia, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom) – it should be noted that this list includes even some non-EU countries. The working group expects to receive some more responses and to reach at least 120 Level 2 stakeholders by mid-June.

For the next steps, the working group and the workstreams envision to follow the timeline below.

Proposed timeline towards the Final Report to the ERPB



This timeline allows for various interactions between the workstreams and the working group to ensure consistency and to avoid eventual overlap in the reporting.

Starting from September 2021, the working group will work on conclusions and, if relevant, gaps identified towards a draft final report that will be reviewed by the workstreams and validated by some selected external stakeholders that are not part of the working group. The draft final report will also be circulated amongst the constituencies of the working group Members for their review, all ultimately leading to a timely final report delivered to the ERPB secretariat early November for the November 2021 ERPB meeting.

5 Actions required from the ERPB

The ERPB is invited to take note of this interim report and let the co-chairs know if they have any questions.

At the moment, all activities are on track for the working group to deliver its final report to the November 2021 ERPB Meeting.

6 Annex 1: List of ERP Working Group Participants

Category	Stakeholder organisation	Representative
Co-chairs	AGE	Anne-Sophie Parent
	ESBG	Diederik Bruggink
ERP Stakeholders	BEUC	Jean Allix
		Alternate: Deborah Faure
	EACB	Marion Delpuech (Credit Agricole)
		Alternate: Agnieszka Janczuk
	EBF	Barbara Pelliccione (Italian Banking Association (ABI))
		Alternate: Anni Mykkänen
	EPC	Raf Rollier (Febelfin)
		Alternate: René Smits (ING)
	EPIF	Loreta Liutkutė Habchi (Western Union)
		Paloma Garcia
	ESBG	Raül López Mayoral (CaixaBank)
		Alternate: Malin Oderud (Swedbank)
		Alternate: Peter Seitz (Erste Bank)
Eurocommerce	Claudia Duckstein (Schwarz Group)	
	Alternate: Norina Plank (Schwarz Group)	
Central Banks	IT	Gianmatteo Piazza (Banca d'Italia)
	NL	Jakob Rotte (De Nederlandsche Bank)
	LU	Peter Deutschen (Banque Centrale du Luxembourg)
	DE	Dagmar Boy (Deutsche Bundesbank)
	LT	Edita Lisinskaitė (Lietuvos Bankas)
	FR	Raymond De Pastor (Banque de France)
		Alternate: Emmanuelle Politronacci (Banque de France)
	AT	Mara Vyborny (Oesterreichische Nationalbank)
	EU	Patricia Roa Tejero (European Central Bank)
Alternate: Jozef Vrana (European Central Bank)		
Relevant Third Parties	ATMIA	Michael Lee
	EVA	Erwin Wetzel
		Alternate: David Irvine
PostEurope	Ágnes Mandelik (starting from 1 June 2021)	
Observers	EU	Céu Pereira (European Commission, DG FISMA)
	EU	Rüdiger Voss (European Commission, DG ECFIN)
		Daniel Boreel (European Commission, DG ECFIN)
Secretariat	ESBG	Alessia Benevelli
		Julie Destuyver

7 Annex 2: Mandate of the ERPB Working Group on Access and Acceptance of Cash



ERPB Secretariat

ECB-PUBLIC
4 February 2021
FINAL

MANDATE OF THE ERPB WORKING GROUP ON ACCESS AND ACCEPTANCE OF CASH

As concluded at the ERPB meeting on 26 November 2020 and in line with Article 8 of the mandate of the Euro Retail Payments Board (ERPB), a working group on analysing access to and acceptance of cash in the euro area is set up. It will conduct a stock taking exercise of various ongoing initiatives by relevant stakeholders and identify gaps not yet addressed and deserving further investigations. On this basis, the ERPB would consider possible next steps.

1. Scope

The ERPB expressed the view that access to and acceptance of cash is a relevant concern and may become a crucial issue in the light of developments driven by the coronavirus (COVID-19) pandemic.

In the course of the structural changes in retail banking, credit institutions continue to adjust their branch networks and strive for optimising operational costs, implying the risk that cash services would become difficult to access in some areas. Whilst consumers and companies seem to still have, by and large, adequate access to cash services of credit institutions, there is evidence that the range of cash services offered is diminishing, at least in certain areas in the euro area. At the same time, the costs associated with acquiring and depositing cash by businesses and the general public seem to be rising.

There are growing concerns about a diminishing network of cash access points (withdrawals and lodgements of cash) - especially for coins – and the related service conditions. In order to safeguard (legal tender) cash as widely accepted and available means of payment and to promote a cooperative approach to improve the cash cycle, the working group will analyse the current cash service levels for consumers and businesses in the euro area and whether they meet customer needs. In case loopholes are identified, the working group may elaborate on them.

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2. Deliverables

The working group is invited to prepare a report summarising the stock take, their analyses and key findings regarding access to and acceptance of cash and the respective conditions thereof, including the following:

- a. Overview of the factors influencing the bank branch and ATM networks (credit institutions and, where applicable, IADs) and description of possible future initiatives how to avoid cash supply deficits, for example in rural areas;
- b. Overview of various initiatives aiming at ensuring adequate cash withdrawal and lodgement facilities, especially for smaller and medium sized enterprises (which usually do not contract CITs to take care of cash lodgements/withdrawals and need to rely on "local" cash services);
- c. Overview of obstacles regarding the acceptance of cash and initiatives aiming to ensure acceptance of cash also in the future; and
- d. Overview and evaluation of alternative ways where other actors (e.g. retailers, post offices) could offer services to provide access to cash (i.e. cashback, cash-in-shop etc.), including possible obstacles hindering such cash services.

Based on their initial findings of the stock-take exercise, the working group may consider providing additional key elements that may be needed to enhance the analysis.

3. Time horizon

The working group will be established in February 2021 and shall deliver its report by November 2021.

4. Participants and chairmanship

The working group shall include relevant stakeholders, including representatives of ERPB members. Other relevant stakeholders may also be invited to join as relevant third parties¹. One representative of the ECB and a limited number of representatives of euro area NCBs will be invited to join the working group as active participants. A representative of the EU Commission will be invited as observer. The working group will be co-chaired by the AGE Platform Europe (demand side) and the European Savings & Retail Banking Group (supply side). The Secretariat will be provided by the European Savings & Retail Banking Group.

Members representing their associations and the co-chairs will be appointed by the ERPB Chair based on suggestions from their respective associations. Other participants – after expressing interest to the ERPB

¹ It is suggested to invite the European Security Transport Association (ESTA), ATM Industry Association (ATMIA) and European Vending and Ticketing Association (EVA) as relevant third party.

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secretariat – may be invited by the ERPB Chair to join the group based on consultation with the members of the ERPB.

5. Rules of procedure

The mandate of the ERPB defines a broad set of rules for the procedures of its working groups: the working group takes positions on a $\frac{3}{4}$ majority basis; dissenting opinions are mentioned in any relevant documents prepared by the working group. The members of the group decide on how to organise secretarial support, timing and rules of meetings and communication via written procedure, as well as on the need and format of any interim working documentation produced. Costs related to the operation, meetings, chairmanship and secretariat are carried by the members of the group themselves.

8 Annex 3: Workstream Participants

Workstream 1: Overview of the factors influencing the bank branch and ATM networks (credit institutions and, where applicable, IADs) and description of possible future initiatives how to avoid cash supply deficits, for example in rural areas.		
Category	Stakeholder organisation	Representative
Subgroup facilitator	AGE	Anne-Sophie Parent
Subgroup participants	BdI	Gianmatteo Piazza
	ESBG	Peter Seitz
	BEUC	Deborah Faure
	EBF	Barbara Pelliccione
	EACB	Marion Delpuech
	EBF	Anna Garifalli
	EACB	Thomas Chuda
	ECB	Cécile Becuwe
	OeNB	Mara Vyborny
	DB	Dagmar Boy
	ATMIA	Michael Lee
	EPC	Fabio Feliziani
Secretariat	ESBG	Alessia Benevelli

Workstream 2: Overview of various initiatives aiming at ensuring adequate cash withdrawal and lodgement facilities, especially for smaller and medium sized enterprises (which usually do not contract CITs to take care of cash lodgements/withdrawals and need to rely on “local” cash services).

Category	Stakeholder organisation	Representative
Subgroup facilitator	EPC	Raf Rollier
Subgroup participants	DNB	Jakob Rotte
	ESBG	Diederik Bruggink
	ECB	Alejandro Zamora Perez
	EPIF	Loreta Liutkutė / Paloma García
Secretariat	EBF	Anni Mykkänen

Workstream 3: Overview of obstacles regarding the acceptance of cash and initiatives aiming to ensure acceptance of cash also in the future.		
Category	Stakeholder organisation	Representative
Subgroup facilitator	BEUC	Jean Allix
Subgroup participants	ESBG	Malin Oderud
	ESBG	Raül López Mayoral
	EPC	René Smits
	BCL	Peter Deutschen
	ESBG	Diederik Bruggink
	EBF	Anni Mykkänen
	ECB	Niels Riedel
	EVA	Erwin Wetzel
	Eurocommerce	Norina Plank/Claudia Duckstein
	ATMIA	Michael Lee
Secretariat	EACB	Agnieszka Janczuk

Workstream 4: Overview and evaluation of alternative ways where other actors (e.g. retailers, post offices) could offer services to provide access to cash (i.e. cashback, cash-in-shop etc.), including possible obstacles hindering such cash services.		
Category	Stakeholder organisation	Representative
Subgroup facilitator	AGE	Anne-Sophie Parent
Subgroup participants	BdF	Raymond De Pastor
	BdF	Emmanuelle Politronacci
	BdI	Gianmatteo Piazza
	EACB	Marion Delpuech
	LB	Edita Lisinskaite
	ECB	Jozef Vrana
	Eurocommerce	Norina Plank/Claudia Duckstein
	BEUC	Jean Allix
	EPC	Jörg Schmiese
	EPIF	Loreta Liutkutė / Paloma García
	PostEurope	Ágnes Mandelik (starting from 1 June 2021)
Secretariat	ESBG	Alessia Benevelli

9 Annex 4: Questionnaire

This Annex contains an overview of the questions that have been sent to the various stakeholders.

Legend:

WS = Relates to the Workstream that raised the question

Target = relevant target audience for the question (sometimes the questions are addressed to the respective associations):

- NCB = National Central Bank.
- Bank = Commercial Bank.
- Retail = Retailers / Merchants.
- Cons = Consumers.
- Other:
 - All = relevant to all.
 - ATMIA / IADs = ATM Industry Association / Independent ATM Deployers.
 - Payees = smaller cash acceptors such as restaurants, self-employed health care professionals, public services.
 - Card Schemes.
 - CITs = Cash in Transit companies.
 - PSPs = Payment Service Providers.
 - FinTechs
 - Post Offices

Please note that the questionnaire is based on the definitions below:

- *Cashback: The provisioning of cash offered by a merchant, which is only available in conjunction with a purchase of goods or services and only offered upon explicit request of the customer, and which is settled as part of a payment transaction.*
- *Cash-in-Shop: The service offered by a merchant, on behalf of payment service provider(s), to withdraw or deposit cash, which is not linked to a purchase of goods or services and which is considered a payment service in the context of PSD2.*
- *Payment Service Providers (PSPs): any entity, including banks, that provides payment services as defined in Annex I of PSD2.*

Please note that some questions have been removed before sending out, hence some open rows.

#	WS	Question	Target				
			NCB	Bank	Retail	Cons	Other
1	1	Do you collect data/have you conducted any studies and/or consumer surveys on: <ul style="list-style-type: none"> Factors influencing bank branches and/or ATM coverage (e.g. ATMs fees and/or financing)? Specific factors affecting access to cash in rural/remote/touristic areas affected by seasonality your country? Existing and/or possible future initiatives to avoid cash supply deficits? If so, please provide a copy of such studies and a short summary of the main factors identified and possible future initiatives to avoid cash supply deficit.	X	X	X	X	All
2	1	What is the average annual cost of maintaining and operating ATMs? Please explain what types of costs are involved, distinguishing between urban, rural/remote sites when relevant, and specific seasonality factors if applicable.		X			ATMIA/ IADs
3	1	What are the main cost drivers for an ATM? Please explain the impact of each cost category (% of incidence on total costs).		X			ATMIA/ IADs
4	1	What kind of fees do you earn from ATMs? Are the ATM fees capped by a) legal regulations or b) contractual limits, for example card schemes?					ATMIA/ IADs
5	1	Which other factors influence your business decision to install an ATM including in rural/remote/touristic area affected by seasonality?					ATMIA/ IADs
6	1	When banks outsource ATM estates to IADs, where do IADs see a business case in this outsource model?					ATMIA/ IADs
7	1	Is there a value-added for IADs ATMs compared to banks ATMs (for ex. that they may offer additional services/be located in areas which banks are no longer offering/covering)?					ATMIA/ IADs
8	1	Is there a growing business case for IADs in the ATM industry and what do you anticipate will be the future scenario for outsourced ATMs?					ATMIA/ IADs
9	1	What is the business case for retailers to host an ATM in their own premises or shopping malls? Please specify differences between urban/rural areas if relevant.			X		Payees
10	1	Which factors influence retailers' decision to choose for a bank or an IAD ATM? Are there any differences between urban and rural/remote/touristic areas?			X		
11							
12	1	Are there any laws/regulations in your country imposing a minimum coverage and geographic repartition of branches and/or ATMs?	X				
13	1	Are there any laws/regulations in your country regarding ATMs coverage, functioning and availability of cash?	X				

#	WS	Question	Target					
			NCB	Bank	Retail	Cons	Other	
14								
15	1	Do you encourage industry initiatives in your country to ensure a minimum coverage and geographic repartition of ATMs (e.g. joint ventures)?	X					
16	1	Are there any public financing initiatives (e.g. via subsidies, or tax-breaks) in your country for the maintenance of a minimum coverage and geographic repartition of branches and/or ATMs?	X					
17	1	Have you formulated any recommendations regarding the geographic repartition of ATMs and/or financing solutions and/or fees which can be charged to consumers using ATMs?	X					
18	1	Are there any regulatory constraints concerning a maximum authorized recycling rate of banknotes (for ATMs, for bank branches or for cash transportation companies)? if so, please communicate this maximum authorized rate.	X					
19	1	Have you formulated any recommendations regarding possible future initiatives to avoid cash supply deficit in urban and rural areas, e.g. on geographical repartition distribution of branches, ATMs and/or financing solutions and/or fees which can be charged to consumers using ATMs?				X		
20								
21								
22	1	What is the cost recovery model of bank-owned ATM (customer fees, disloyalty fees, etc.) Are these fees regulated/capped?		X				
23	1	What are the main cost drivers for bank branches offering cash services?		X				
24	1	What is the cost recovery model for cash services offered in bank branches (customer fees, other?)		X				
25	1	Are there any specific taxes (e.g. regional, local) which apply when providing ATMs in your country?		X				ATMIA
26	1	What are the key factors underlying banks' choice for the location of their ATM network/bank branches?		X				
27	1	What are the main obstacles faced by banks related to the maintenance and operation of an ATM/a bank branch?		X				
28	1	Could "mobile branches" be a solution in regions where it is not possible to maintain a permanent branch/ATM?		X				
29	1	Are there benefits for banks that IADs take over the ATM network and if so which?		X				
30	1	Are banks willing to outsource (as partner) their ATM network to IADs, for ex. in rural areas?		X				
31	1	Have banks closed branches and/or ATMs in the last two years? If yes, what has influenced their decision (declining transactions/rising costs/other)? What was the impact on cash supply in the affected area? Are you aware of alternative solutions implemented by banks to avoid cash supply deficit?		X				

#	WS	Question	Target				
			NCB	Bank	Retail	Cons	Other
32	1	What trends do you expect with respect to bank branches offering cash services and/or bank-owned ATMs in the next two years?		X			
33	1	Are you aware of any industry initiative to ensure a minimum coverage and geographic repartition of ATM and/or to optimise the costs of providing ATM (e.g. joint ventures such as BATOPIN in BE and Geldmaat in the NL)? If so, please describe such initiatives and, to the extent possible, the legal and cost structures of such joint ventures.		X			
34	1	Do issuing banks usually charge their own customers for the use of other banks' ATMs (disloyalty fee)? Are these fees regulated/capped?		X			
35	1	Do you have examples of business models for ATM networks where customers of different banks are offered mutual free or preferential access to their ATM?		X			
36							
37	1	Are you aware of any public financing scheme (e.g. via subsidies, or tax-breaks) to ensure a minimum coverage and geographic repartition of ATM? If so, could you describe the functioning of such scheme or indicate where such information can be found?		X			
38	1	Are you aware of any bank initiatives to offer information about ATM coverage, functioning and availability of cash to their customers? Are there any initiative of this kind in your country?		X			
39	1	Would you have any suggestion on how the deployment of ATMs could be facilitated to avoid cash supply deficit? What would you consider best practice?		X			
40	1	Is there a best practice approach for shared infrastructure approach?		X			

#	WS	Question	Target																																																				
			NCB	Bank	Retail	Cons	Other																																																
41	2	<p><u>Cash withdrawal and/or cash lodgement facilities:</u> Please provide information on any initiative in your country seeking to ensure adequate facilities for either cash withdrawal and/or cash lodgement, especially for – but not necessarily limited to -smaller and medium sized enterprises (for example: legislation mandating ATM presence; ATM pooling put in place by the industry; initiatives limiting ATM fees; smart safes; etc.). Please include a description of these initiatives and their intended objectives.</p> <table border="1"> <thead> <tr> <th>Initiative name</th> <th>Country</th> <th>Withdrawal/ Lodgement/ Both</th> <th>National/ Regional/ Local</th> <th>Regulatory / Non-regulatory / 'soft law'</th> <th>Initiative description</th> <th>Initiative objectives</th> <th>Party Responsible / leading the initiative</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Initiative name	Country	Withdrawal/ Lodgement/ Both	National/ Regional/ Local	Regulatory / Non-regulatory / 'soft law'	Initiative description	Initiative objectives	Party Responsible / leading the initiative																																									X	X	X	X	All but Card Schemes
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42	2	<p><u>Initiatives on acceptance of cash:</u> Please provide information on any initiative that you are aware of in your country seeking to ensure the continued acceptance of cash (for example legislation ensuring cash acceptance by payees, etc.). Please include a description of this initiative and its intended objectives.</p> <table border="1"> <thead> <tr> <th>Initiative name</th> <th>Country</th> <th>Withdrawal/ Lodgement/ Both</th> <th>National/ Regional/ Local</th> <th>Regulatory / Non-regulatory / 'soft law'</th> <th>Initiative description</th> <th>Initiative objectives</th> <th>Party Responsible / leading the initiative</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Initiative name	Country	Withdrawal/ Lodgement/ Both	National/ Regional/ Local	Regulatory / Non-regulatory / 'soft law'	Initiative description	Initiative objectives	Party Responsible / leading the initiative																																									X	X	X	X	
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43	2	<p><u>Transport and processing of cash:</u> Please provide information on any initiative that you are aware of in your country seeking to ensure adequate cash management facilities for enterprises.</p> <p>a. lodgement facilities offered by CIT companies; b. ATMs deployed by CIT companies (deployed on the own account of CIT companies / others). c. strategic continuity (ensuring continued presence of CIT services). Please include a description of this initiative and its intended objectives.</p> <table border="1"> <thead> <tr> <th>Initiative name</th> <th>Country</th> <th>Withdrawal/ Lodgement/ Both</th> <th>National/ Regional/ Local</th> <th>Regulatory / Non-regulatory / 'soft law'</th> <th>Initiative description</th> <th>Initiative objectives</th> <th>Party Responsible / leading the initiative</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Initiative name	Country	Withdrawal/ Lodgement/ Both	National/ Regional/ Local	Regulatory / Non-regulatory / 'soft law'	Initiative description	Initiative objectives	Party Responsible / leading the initiative																																	X	X	X	X	CITs
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44	2	<p>Please provide information on <u>any initiative that you are aware of in your country</u> seeking to further enhance the functioning of the cash cycle which cannot be classified in the above categories. Please include a description of this initiative and its intended objectives.</p> <table border="1"> <thead> <tr> <th>Initiative name</th> <th>Country</th> <th>Withdrawal/ Lodgement/ Both</th> <th>National/ Regional/ Local</th> <th>Regulatory / Non-regulatory / 'soft law'</th> <th>Initiative description</th> <th>Initiative objectives</th> <th>Party Responsible / leading the initiative</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Initiative name	Country	Withdrawal/ Lodgement/ Both	National/ Regional/ Local	Regulatory / Non-regulatory / 'soft law'	Initiative description	Initiative objectives	Party Responsible / leading the initiative																																	X	X	X	X	CITs
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45																													
46	3	<p>How important are the following criteria for payees when choosing to accept a means of payments? If there are other criteria which are important for them and which are missing, please add them to the table.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 70%;"></th> <th style="width: 30%;">Importance</th> </tr> </thead> <tbody> <tr> <td></td> <td>1. Not important; 2. Somewhat important; 3. Important; 4: Very important</td> </tr> <tr> <td>Overall costs for the payee</td> <td></td> </tr> <tr> <td>Transaction speed</td> <td></td> </tr> <tr> <td>Most reliable/least sensitive to malfunctioning</td> <td></td> </tr> <tr> <td>Least risky in terms of fraud/shrinkage caused by own staff</td> <td></td> </tr> <tr> <td>Least risky in terms of theft/robberies by externals</td> <td></td> </tr> <tr> <td>Customer preference</td> <td></td> </tr> <tr> <td>Quick access to funds / liquidity for further use in your supply chain</td> <td></td> </tr> <tr> <td style="text-align: right;">_____ (other)</td> <td></td> </tr> <tr> <td style="text-align: right;">_____ (other)</td> <td></td> </tr> </tbody> </table>		Importance		1. Not important; 2. Somewhat important; 3. Important; 4: Very important	Overall costs for the payee		Transaction speed		Most reliable/least sensitive to malfunctioning		Least risky in terms of fraud/shrinkage caused by own staff		Least risky in terms of theft/robberies by externals		Customer preference		Quick access to funds / liquidity for further use in your supply chain		_____ (other)		_____ (other)				X		Payees
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47	3	Please explain further the main reasons of the above ranking, especially for those criteria which are most and least relevant for payees.			X		Payees																						

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			NCB	Bank	Retail	Cons	Other
48	3	How do you assess cash payments, if you apply the above criteria, including possible additional own criteria? Please give points from 1 to 5			X		Payees
		Cash					
		Debit					
		Credit					
		Cheque					
		Mobile					
		others					
		Overall cost for payee (1: most expensive, 5: least expensive)					
		Transaction speed (1: slowest, 5: quickest)					
		Most reliable/least sensitive to malfunctioning (1: least reliable, 5: most reliable)					
		Least risky in terms of fraud /shrinkage caused by own staff (1: most risky, 5: least risky)					
		Least risky in terms of theft/robberies by externals (1: most risky, 5: least risky)					
		Customer preference (1: most inconvenient, 5: most convenient)					
		Quick access to funds / liquidity for further use in your supply chain (1: slowest, 5: quickest)					
		_____(other) (1: most inconvenient, 5: most convenient)					
49	3	If you do not accept cash in your business or parts of your business, what are the main reasons for this? Please describe in detail.			X		Payees
50							
51	3	How do existing regulations affect the means of payment you accept?			X		Payees
52	3	What are your main concerns in terms of security, fraud, or fraud by staff when accepting and handling cash?			X		Payees

#	WS	Question	Target																																								
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53	3	What obstacles do you see now and in the future for accepting cash in your trade? Please take into account the whole process associated with the acceptance of cash (e.g., from point of sale to handling and deposit).			X		Payees																																				
54	3	Have you noticed any changes in how your customers prefer to pay during the COVID-19 pandemic?			X		Payees																																				
55	3	Have you taken measures to ask your customers to pay contactless? If yes, why?			X		Payees																																				
56	3	<p>If you think about the different activities associated with the overall cash handling, which are the main activities/processes/fees causing costs/efforts for you? Please rank these costs according to their share from highest share (1) to lowest share (10).</p> <table border="1"> <thead> <tr> <th>Type of cost</th> <th>Rank (1: highest share, 10: lowest share)</th> <th>Main driver(s) for these costs</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	Type of cost	Rank (1: highest share, 10: lowest share)	Main driver(s) for these costs																																				X		Payees
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			NCB	Bank	Retail	Cons	Other
57	3	How do you assess the current fees charged for depositing and withdrawals / change money? Please elaborate in detail.			X		Payees
58	3	If you think about an average transaction, are the overall costs for accepting cash lower, equivalent or higher than for accepting other means of payments?			X		Payees
59	3	How do you assess the overhead costs for accepting cash compared to other means of payment?			X		Payees
60	3	Have the overall costs of cash for your company increased or decreased in the recent past (3 years ago)? In which areas were the most significant changes and what were the drivers?			X		Payees
61	3	In which areas do you expect major changes to your costs associated with cash in the next 3 to 5 years?			X		Payees
62	3	What is your view on the use of 1 and 2 euro cent coins?			X		Payees
63	3	What factors do you have to consider in the back-office when accepting cash?			X		Payees
64	3	How do you deal with the cash received in payments in your trade (multiple answer possible)? <ul style="list-style-type: none"> • Deposit the cash in a bank branch over the counter • Deposit through a CRM (cash recycling machine) or CDM (cash deposit machine) • Use a smart safe/box /vault • Agreement with a CIT company for regular cash pick-up • Night vault / seal bag / etc. (physical drop off) • Other, please specify 			X		Payees
65	3	How do you plan and order your change money for the coming day(s)?			X		Payees

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66	3	<p>Please rate the following drivers for how you deposit cash from 1: not important to 4 very important:</p> <table border="1"> <thead> <tr> <th>Driver</th> <th>Importance</th> </tr> </thead> <tbody> <tr> <td></td> <td>1: Not important 2. Somewhat important 3. Important 4: Very important</td> </tr> <tr> <td>Price/costs</td> <td></td> </tr> <tr> <td>Availability (of deposit facilities/service provider)</td> <td></td> </tr> <tr> <td>Distance</td> <td></td> </tr> <tr> <td>Opening Hours</td> <td></td> </tr> <tr> <td>Security of my staff</td> <td></td> </tr> <tr> <td>Security of the deposit facilities</td> <td></td> </tr> <tr> <td>Other, please specify</td> <td></td> </tr> </tbody> </table>	Driver	Importance		1: Not important 2. Somewhat important 3. Important 4: Very important	Price/costs		Availability (of deposit facilities/service provider)		Distance		Opening Hours		Security of my staff		Security of the deposit facilities		Other, please specify				X		Payees
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67	4	The definitions of cashback and cash-in-shop mentioned at the beginning of the questionnaire have been developed by the Eurosystem. Do you think new definitions are required in order to better reflect these services? If yes, please provide your suggestions.	X	X	X	X																			
68	4	<p>What are the main reasons for customers asking for cash:</p> <p>a. via cashback?</p> <p>b. via cash-in-shop?</p> <p>Should these services be promoted more? Please specify.</p>				X																			
69	4	What are the main reasons for merchants and PSPs to offer cashback and/or cash-in-shop (e.g. less till to handle at the end of the day, attracting (new) customers, competition on the market for the services offered, etc.)? Please specify.		X	X		PSPs, FinTechs																		
70	4	<p>Is it possible for retailers POS system/Software to automatically distinguish between a purchase and cashback amounts at the till? In particular:</p> <p>a. When the amounts are transmitted to the PSP/acquiring bank for clearing, is there a distinction made between cashback amount and purchase amount or is only the lump sum transmitted?</p> <p>b. In cases where only the lump sum is submitted, would it be technically feasible to also transmit the separate amounts or are there reasons against that? (e.g., too much effort/costs to adapt the IT, scheme regulations, etc).</p>		X	X		PSPs, FinTechs, Card Schemes																		

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71	4	Are customers informed that cashback/cash-in-shop is offered by a merchant? If yes, how are customers usually informed? (locally at the shop/ internet/ etc?) If they are not informed, why?		X	X		PSPs, FinTechs, Card Schemes
72	4	With respect to the obligations set out in the European legal framework (Regulation EC No. 1338/2001, Decision ECB 2010/14) concerning the euro banknotes recirculated in the cash-in-shop scheme, could you please provide an overview of the different measures you may have adopted to comply with the referred applicable laws (e.g. trained staff member who manually carry out the banknotes' authenticity and fitness checking/use of a type of banknote handling machine successfully tested by a National Central Bank) as well as the main challenges identified?		X	X		PSPs, FinTechs, Card Schemes
73	4	Could you quantify the number and value of cashback/cash-in-shop transactions in absolute terms?		X	X		PSPs, FinTechs, Card Schemes
74	4	Could you quantify the number/value of cashback transactions either as: a. A percentage of total POS transactions made in cash, and b. Total cash distributed via cashback as a percentage of the total cash received as payments at POS. c. Are there significant differences between urban, rural and touristic areas affected by seasonality?			X		Card Schemes
75	4	Could you quantify the number/value of cash-in-shop transactions as a % of ATM withdrawals? Are there significant differences between urban, rural and touristic areas affected by seasonality?		X			PSPs, FinTechs, Card Schemes

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76	4	<p>a. Are all the fees listed below applied for cashback schemes and who receives them?</p> <table border="1"> <thead> <tr> <th>Type of fee</th> <th>Payer of the fee</th> <th>Recipient of the fee</th> </tr> </thead> <tbody> <tr> <td>merchant service charge</td> <td></td> <td></td> </tr> <tr> <td>interchange fee</td> <td></td> <td></td> </tr> <tr> <td>scheme fee</td> <td></td> <td></td> </tr> <tr> <td>other, please specify</td> <td></td> <td></td> </tr> </tbody> </table> <p>b. For direct cash-in-shop without banks (open to all holders): who pays the fees and who receives them?</p> <table border="1"> <thead> <tr> <th>Type of fee</th> <th>Payer of the fee</th> <th>Recipient of the fee</th> </tr> </thead> <tbody> <tr> <td>please specify</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table> <p>c. For cash-in-shop offered by banks (open only to cardholders of the banks): who pays the fees and who receives them?</p> <table border="1"> <thead> <tr> <th>Type of a fee</th> <th>Payer of the fee</th> <th>Recipient of the fee</th> </tr> </thead> <tbody> <tr> <td>please specify</td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Type of fee	Payer of the fee	Recipient of the fee	merchant service charge			interchange fee			scheme fee			other, please specify			Type of fee	Payer of the fee	Recipient of the fee	please specify												Type of a fee	Payer of the fee	Recipient of the fee	please specify													X	X		PSPs, Card Schemes, FinTechs
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77	4	<p>Do the above fees always apply in the same way irrespective of the country or are they country-specific?</p> <p>a. For cashback</p> <p>b. For cash-in-shop</p>		X	X		PSPs, Card Schemes, FinTechs																																													

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78	4	Could you quantify the fees applied to cashback/cash-in-shop indirectly by comparing it to the fees applicable to the POS payment or ATM withdrawal?		X	X		PSPs, FinTechs and Card Schemes
79	4	In cases where merchants need to pay merchant service charge, would it be feasible, in order to promote cashback services (in rural areas) that the fee structure changes like for ATMs so that a fee from issuer's bank is paid to the acquirer (merchant) bank; as a minimum in places where cashback/cash-in-shop fills in the gap of missing cash infrastructure?		X			PSPs, FinTechs, Card Schemes
80	4	What are the main reasons for not offering cashback/cash-in-shop (e.g. security concerns, longer waiting times at a till, not enough cash if cashback/cash-in-shop gets too popular, etc.)? Please specify.			X		
81	4	What are the main reasons for not offering cash-in-shop (bank's strategy, no retailer's network in rural areas, no desire to depend on a provider, etc.)? Please specify.		X			
82	4	If offered by a merchant, is cashback/cash-in-shop offered automatically in all its branches? If not, what are the reasons for it?			X		
83	4	What in your view will be the evolution of cashback/cash-in-shop in the near future and what will affect its presence on the market?		X	X	X	PSPs, FinTechs, Card Schemes
84	4	What should the relevant institutions do to make a. cashback b. cash-in-shop attractive alternative way(s) of accessing cash (especially in rural and touristic areas and touristic areas affected by seasonality)?		X	X	X	PSPs, FinTechs
85	4	Are you aware of any existing initiative or plan to pursue an initiative that may act as an alternative cash access/supply point in the future (other than a bank branch, cash dispenser, cashback and cash-in-shop)? If yes, please specify and share the project scope.		X	X	X	PSPs, FinTechs, Card Schemes
86	4	Are there any fees for consumers associated with: • Cashback? • Cash-in-shop?			X	X	

#	WS	Question	Target				
			NCB	Bank	Retail	Cons	Other
87	4	Have you conducted any studies/formulated any recommendations on possible alternative cash access points in your country (e.g. cashback, cash-in-shops, other)? If so, please provide a copy of such studies/recommendations.	X	X	X	X	All
88	4	Do post offices in your country offer ways to access cash, both in urban and rural/remote areas alternative to ATMs? If yes, please provide details.					Post Offices
89	4	What kind of costs such services imply for post offices?					Post Offices
90	4	Do you consider the cost model (fees) sustainable for post offices?					Post Offices
91	4	Should these services be promoted, and if yes, how?					Post Offices
92	4	Have post offices launched any initiatives, possibly with other stakeholders, how to maintain/increase cash access and deposit points (in general or in rural areas)					Post Offices
93	3	What are the main developments in the CIT market in your view?					CITs
94	3	How has CITs profitability been affected by these developments?					CITs
95	3	What obstacles do you see in CITs general operations?					CITs
96	3	What are the main cost drivers for CITs business?					CITs
97	3	What factors influence the costs for the provision and collection of cash? How do they differ for coins and banknotes?					CITs
98	3	What are CITs main security concerns?					CITs