



EUROPEAN CENTRAL BANK

EUROSYSTEM

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Institution/Company

PayPal

Contact person

Mr/Ms

First name

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Email address

Telephone number

Please tick here if you do not wish your personal data to be published.

General comments

Please find specific comments on the next sheet.

Template for comments

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:	7 May 2020
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ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Annex III	Table 8	N/a	24	Clarification	Is Table 8 required to be populated by institutions who only populated "Indirect Participants" on Table 7? I.e. Institutions who are not a Direct Participant in any payment system.	Guidance to table 8 does not appear to explicitly clarify interaction with table 7 regarding types of institutions that are required to populate table 8.		Don't publish
2	Annex III	Tables 4a, 5a, 9	N/a	24	Clarification	Are indirect participants required to report on Credit Transfer and Direct Debit transactions/volumes which are processed through a EU regulated third party subject to the same reporting obligations?	If Credit Transfer and Direct Debit transactions are reported by both direct and indirect participants they will be double counted in the total statistics.		Don't publish