# Template for comments

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

**Institution/Company**

SIA Transact Pro

**Contact person**

**Mr/Ms**

**First name**

**Surname**

**Email address**

**Telephone number**

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

**General comments**

# Template for comments

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

**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 |
|---|---|

| 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 I | | 2.8.6. | 22 | Amendment | It is suggested that the data collected on card payments ar part of Table 9 should be reported split by Merchant category groups rather than individual MCCs, where a merchant category group is a combination of multiple MCCs that represent the same or similar industry / sector of economy / business line, such as, for example, Travel (which could include MCCs for hotels, airlines, rairoads, travel agents etc.), Professtional services (which could include hairdressers, beauty parlors, spas etc.) and others. The problem with individual MCCs is that they are too numerous.  Our records show that during the first quarter of 2020 our issued cards were used in 32 different countries at merchants identified uner 184 different MCCs). Given this and the fact that the volumes must be additionally split to remote vs. non-remote payments we are potentially required to report more than 11,000 entries under "Card payments" in Table 9 alone. Not only does it present a significant burden, especially to smaller institutions, like ourselves, but it is also extremely hard to believe such granularity is justified. | Reporting card payments split by bigger categories, like Merchant Category groups rather than individual MCCs, would take off a disproportionate burden of collecting, validating and reporting huge amount of data that is hardly usable when it is so granular. Data grouped under bigger categories than individual MCC would also present a better overview and justify cost as compated to value of the collected data. | | Don't publish |