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<input type="checkbox"/>	The comments provided should <u>NOT</u> be published
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Issue	Comment	Reasoning
1. General Part - Payment account access services	Amendment	<p>All payment accounts issued to customers (account owners) by account servicing PSPs must be accessible online and in real-time for certified PSPs (= Payment Institutions) in order to allow them to obtain account information services and operate on a non discriminatory way payment initiation services, regardless if the are or not the account servicing PSP (= bank) or not (= non-banks).</p> <p>To be compared it with a PC and an USB-stick: all PCs (= payment accounts) must have a USB-port where a reliable connection can be made via a trusted USB-stick, provided by the bank but also by a certified PSP (non-bank). The USB-stick will contain the necessary elements allowing the account servicing PSP to immediately identify that the information-payment authorization request/instructions/payment order are coming from a certified PSP transmitting on a trusted way the information-payment authorization request/instructions/payment order, which <b>MUST</b> be executed just as if it was coming from the account servicing PSP itself, with the same speed and service level and without any other condition neither additional technical neither other condition. Maybe useful that an independent authority (ECB) fixes the necessary security criteria and technical aspects which have to be implemented/respected in this context, in order to avoid any delay in the execution of the information-payment authorization request/instructions/payment order by the account servicing PSP when the order is coming from a certified non-bank PSP.</p>

<p>1. General Part - Payment account access services + Scope and addressees</p>	<p>Amendment</p>	<p>The ECB recommendations are applicable only to "internet-based payment account access services", which exclude "classic" card transactions at physical POS. The question is "Why ?" since notwithstanding the progress of e-commerce and mobile payments hype the major part of electronic payments are still "classic" card based transactions. This limitation excludes access services for card-based transaction at POS, which is not acceptable, as it would allow current dominant incumbents in the "classic" card-based transactions sector to continue to block market access and open and fair competition. This is detrimental to all users, consumers and merchants, but also to new alternative operators (non banks) and solutions for both for card-based as for internet-based transactions, for whom online and real-time payment account access (with agreement of the account holder/cardholder) is crucial.</p>
<p>2. Recommendations - Traceability - BP5.1.</p>	<p>Amendment</p>	<p>The possibility is given for Account Servicing PSPs (= banks) to provide customers (= merchants) with specific credentials to be used for payment account access services, for example in order to "allow the account servicing PSP to identify whether the account owner (= cardholder/consumer) is making use of a payment account access service". This could not of course be an opportunity for account servicing PSPs (banks) to put more con-stringent (= discriminatory) conditions for payment account access services operated by TPs, compared to payment account access for transactions with cards/internet solutions issued by these account servicing PSPs (banks).</p>