

NOTE

To
European Central Bank

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ECB Consultation on Draft Recommendations for Payment Account Access Services – The UK Cards Association (GB) Response

About The UK Cards Association

The UK Cards Association is the leading trade association for the card payments industry in the UK. With a membership that includes all major credit, debit and charge card issuers, and card payment acquirers, the Association contributes to the development of legislative and regulatory frameworks; develops industry best practice; safeguards the integrity of card payments by tackling card fraud; develops industry standards; and co-ordinates other industry-wide initiatives across matters relating to both card payments and the provision of credit. www.theukcardsassociation.org.uk

The UK Cards Association (GB) Response

The UK Cards Association wishes to record its full support for the response provided to the ECB by the Payments Council (GB). The response covers all of the issues that we would have wished to raise with the ECB in relation to the SecuRe Pay Forums recommendations for Payment Account Access Services which we see as an essential part of ensuring the integrity of payments systems.

In particular we would endorse the Payments Council positions on:

- Clarification of the Scope – We believe it is essential that the scope of the recommendations include digital wallet providers where they offer the same account access or payment initiation functionality as TPP. Payment account details, including card account information, may be loaded into a digital wallet which could operate in such a way.
- 5.1 BP – We agree that the provision of “*specific security credentials*” for use with PAAS will lead to greater customer confusion and error and that the account holding PSP should define what is necessary to allow them “*to identify whether the account owner is making use of payment account access services*”.
- 10.1 – The requirement on TPPs to “*identify suspicious transactions*” needs more careful consideration, their ability to do so is dependent on them having full access to the details of the transaction and some knowledge of the customers transaction/behavioural history. Given that ultimately it is the AS PSPs responsibility to identify suspect transactions is it appropriate to place such a burden on the TPPs?



- 10.2 – In the context of the Recommendations for Secure Internet Payments the Acquiring PSP is required to monitor the activities of e-merchants and recommends contractual relationships to support compliance with the ECB recommendations. It is difficult to see what additional role a TPP, who may have only limited access to the e-merchants transaction history can play in fraud detection and prevention processes.

