#	Comment	Response	Category	Sub-Category
1	As UniCredit we are substantially aligned with subscription criteria for ISO20022 notifications, but, concerning mandatory distribution vs. optional distribution, we think that in the point 6 on page 6, the bank to bank to customer debit/credit notification (camt.054) should be considered mandatory and not optional (even if included in the message subscription choice). Our consideration relied on the importance of the camt.054 as final identification, for accounting purposes, of each transaction even if not instructed by the account owner. For example a transfer initiation order by an AS or a liquidity transfer between CLM and each other service need to be accounted correctly by using camt.054.	Thank you for the provided comment. Please note that to our understanding the mandatory subscription of camt.054 would not meet the user requirements of other participants. In order to address these user requirements, the proposal is to allow every participant to select which business cases will trigger a camt.054 message, i.e. all business cases, no business case or a subset of business cases.	Mandatory vs. Optional Distribution	camt.054
2	Written procedure: Slide 6 item 6: The point 'A FIToFICreditTransfer (pacs.009) send by an AS (NB: notification send to account owner of debited account)' does not meet our expectations. We would like to receive camt.054 instead. Rationals see above. In case that ECB sees the need for further discussion with TCCG members we are happy to contribute to such discussions. Rationals: pacs.009 would be dealt with like a 'payment' and consequently being routed into payment applications, i.e. following processing steps like any other payment (screening, processing, checks on need for statictical reporting etc). In such case, those items (given the special nature would fall into repair queues. For Ancillary System transactions, banks typically use dedicated routines with dedicated booking rules depending on the AS involved and on the information given in the related message. It would be a preferred route to have camt.054 for both credits and debits, which would avoid above constraints of repair-queues etc.	Please note that that a FIToFICreditTransfer (pacs.009) send by an AS will trigger the standard reporting of a pacs.009 FIToFICreditTransfer, i.e. the debtor will receive a camt.054 and the creditor receives a pacs.009 according to HVPS+. The message content of the pacs.009 will allow the creditor to identify that the payment was initiated by an AS. In detail, the forwarded pacs.009 message will contain the code word "ASTI", the message will contain an additional party "DebtorAgent" quoting the AS as well as the message will be sent with "urgent" priority. Following the discussion in the last July TCCG meeting, a presentation addressing open questions has been prepared on this subject and is part of the background documentation of the September TCCG meeting.	AOB	AS Payments - camt.054 vs. pacs.009
3	Could you provide just some small clarifications regarding the following: (i) "Principles: The message subscription has a "valid from" date and will become active at the earliest as of the next business day" This means that the message subscription has a "valid from" which can be, at the earliest, the next business day. The message subscription will become active on the business day defined as "valid from" [or only in the business day after the valid from?]	Please note that the message subscription will become active on the business day defined as "valid from", i.e. the next business day earliest.	Question	Principles - Valid From
4	Could you provide just some small clarifications regarding the following: (ii) "Principles: The message subscription has an optional "valid to" date and the subscription can be amended or cancelled as of the next business day." This means that a message subscription has a "valid to", after which it is not valid anymore. The "the subscription can be amended or cancelled as of the next business day." is related with the fact that there is a "valid to" date or is a separate bullet point? We assume that a message subscription can be amended or cancelled at any point in time. Such amendment or cancelation will become active in the new "valid from date", which can be the next business day at the earliest?	Please note that the message subscription can be amended or cancelled at any point in time. However, the change will only become effective as of the next business day earliest.	Question	Principles - Valid To
5	Could you provide just some small clarifications regarding the following: (iii) "Principles: The party owning the cash account should not be able to elect another party to receive the message either instead or in addition to the account owner" To which DN of the account owner are the messages sent (in this case, only notifications - camt.054 and camt.004 - because query responses are sent to the sender of the query request and reports are subject to report configuration)? Is it defined within the message subscription? This principle is valid for notifications and query responses but not to reports, right? For example, a Central Bank can request to receive the statement of accounts of the respective participants "instead or in addition to the account owner"?	a) To our understanding the DN is not specified in the message subscription. The message subscription documents if a notification message is to be created and send in the first place. As a second step the configuration routing will define which DN is to be addressed and has to receive the respective message. b) Reports are defined in the report configuration. Hence, the message subscription principle does not apply for report configuration.	Question	Principles - Another Party
6	Receipt camt.025 #2 For the sake of completeness it would be very useful if you could add c) the partial execution of any creation and modification request and list the notifications where partial execution is feasible (e.g. camt.048 as in UDFS RTGS table 68 "In case of (partial) execution of the reservation a camt.025 is created and sent via ESMIG to RTGS participant A.") By the way: Why is there no camt.025 for partial execution of the reservation in CLM but in RTGS? (See Table 36, Step 4 in UDFS CLM "Note: Only in case the total amount could be reserved, a notification (camt.025) is sent to the owner of the main cash account (or another actor acting on behalf).")	Thank you for the provided comment. Please note that we have updated the presentation to reflect that for intraday ModifyLimit (camt.011) and ModifyReservation (camt.048) a final status (i.e. completed or rejected) and the first intermediate status (i.e. pending or partially pending) are notified via camt.025. Furthermore, please note that this topic is part of the September TCCG under a different agenda item.	Clarification	camt.025
7	Bank to Customer Debit Credit Notification (camt.054) #6 The Distribution column states "Depending on message subscription by business case". Could you give an example how a message subscription by business case would look like?	Example: Message Subscription by Business Case Account A: Account owner subscribes to all business cases, i.e. will receive camt.054 every time one of the Account B: Account owner subscribes only to subset of business cases, e.g. camt,054 will be triggered to account owner if connected payment by responsible CB has settled, but will not be triggered if mandated payment by responsible CB has settled, Account C: Account owner does not subscribe to camt.054, i.e. the account owner will not receive camt.054 and relays on other information sources like end of day camt.053 or U2A screens to understand bookings on its account.	Question	camt.054

#	Comment	Response	Category	Sub-Category
8	A FIToFICredit Transfer (pacs.009) send by an AS (NB: notification send to account owner of debited account). We would also like to have a camt.054 notification send to account owner of credited account instead of the proposed pacs.009 message. The pacs.009 message would seriously alter today´s existing booking and handling procedures for AS settlement. We took note from the last TCCG that the proposed pacs.009 message would be re-assessed as a number of TCCG participants preferred a camt.054 instead.	Please note that that a FIToFICreditTransfer (pacs.009) send by an AS will trigger the standard reporting of a pacs.009 FIToFICreditTransfer, i.e. the debtor will receive a camt.054 and the creditor receives a pacs.009 according to HVPS+. The message content of the pacs.009 will allow the creditor to identify that the payment was initiated by an AS. In detail, the forwarded pacs.009 message will contain the code word "ASTI", the message will contain an additional party "DebtorAgent" quoting the AS as well as the message will be sent with "urgent" priority. Following the discussion in the last July TCCG meeting, a presentation addressing open questions has been prepared on this subject and is part of the background documentation of the September TCCG meeting.	AOB	AS Payments - camt.054 vs. pacs.009
9	There are a few deviations in the presentation from UDFS CLM and RTGS v0.3 which we would like you to clarify: • Page 3 Principles states: "The party owning the cash account should not be able to elect another party to receive the message either instead or in addition to the account owner. UDFS CLM 3.2.16 Notification message subscription reads: "Message subscription shall allow a CLM participant to elect another party to receive some pre-defined messages either instead or in addition" UDFS RTGS 3.2.16 Notification message subscription reads: "Message subscription shall allow a RTGS participant to elect another party to receive some pre-defined messages either instead or in addition"	Please note that the presentation deviates from the current URD and UDFS documents. In detail, the message subscription for "another party" is lacking a use case and hence is a candidate for de-scoping. An URD CR will need to be raised to remove the reference of message subscription for "another party".	Question	Principles - Another Party
10	There are a few deviations in the presentation from UDFS CLM and RTGS v0.3 which we would like you to clarify: The presentation lists the sender of original request as receiver of the camt.025. UDFS RTGS Table 68 Step 3 says "Note: In case of an immediate reservation sent by an actor different from the account owner, also the sender of the camt.048 receives a camt.025". Same note appears also in Tables 69 and 70. Does that mean that the account owner and the sender of the camt.048 receive a camt.025? Furthermore Table 36, Step 4 in UDFS CLM states "Note: Only in case the total amount could be reserved, a notification (camt.025) is sent to the owner of the main cash account (or another actor acting on behalf)." Here the owner of the main cash account would receive the camt.025 not the sender of the original request.	Please note that the camt.025 is classified as so called "sender notification", i.e. always the sender of the underlying message (e.g. camt.048) will receive the receipt notification to our understanding. Table 36, Step 4 CLM UDFS v0.3 implies that the account owner is the sender of the camt.048 message, respectively "another acting on behalf" is the sender of the message. Concerning Table 68 Step 3 RTGS UDFS v0.4, we suggest to correct the sentence, i.e. always the sender receives the camt.025.	Notification Recipient	camt.025
11	There are a few deviations in the presentation from UDFS CLM and RTGS v0.3 which we would like you to clarify: • Resolution of investigation (camt.029) #4: The description states that camt.029 indicates i.a. the successful cancellation of a pending payment instruction Payment Return (pacs.004). UDFS RTGS 5.2.6 Revocation of payments reads: "A cancellation request can be sent to revoke the following types of payments: pacs.008, pacs.009/pacs.009COV, pacs.010" Pacs.004 is missing in UDFS.	Thank you for the provided feedback. To our understanding all payment instructions can be revoked via camt.056. Hence we suggest to update the RTGS UDFS chapter accordingly and add pacs.004 to the list of payment types.	Question	camt.029
12	There are a few deviations in the presentation from UDFS CLM and RTGS v0.3 which we would like you to clarify: • Resolution of investigation (camt.029) #5: The Distribution for the successful forwarding of a cancellation request is marked optional. UDFS RTGS Figure 11 shows a mandatory message.	Please note that in general the camt.029 will be mandatory (i.e. in case of reject or success). However, based on the feedback received during the last TCCG meetings the proposal is to make the camt.029 optional in case the camt.056 has been forwarded only. Therefore, depending on the agreement reached on TCCG level the UDFS would be adjusted accordingly.	Mandatory vs. Optional Distribution	camt.029
13	• Slide 3 - 5th bullet: This principle does not seem to be in line with the URD SHRD.UR.BDD.190 which is provided as one reference for the principles. According to SHRD.UR.BDD.190 there should be "the possibility for the Party owning the Cash Account to elect another Party to receive the message either instead or in addition. This would be subject to prior agreement having been reached with the other Party by, for example, granting a Power of Attorney." This seems to contradict the principle on slide 3 where "the party owning the cash account should not be able to elect another party....". Is my understanding correct that SHRD.UR.BDD.190 and the bullet on slide 3 seem to contradict each other? If yes, and if the intention is to change SHRD.UR.BDD.190, I think we should make the TCCG / banks explicitly aware of this and be very transparent that the presentation deviates from the URD and why.	Please note that the presentation deviates from the current URD and UDFS documents. In detail, the message subscription for "another party" is lacking a use case and hence is a candidate for de-scoping. An URD CR will need to be raised to remove the reference of message subscription for "another party".	Question	Principles - Another Party
14	• With regard to the tables, we are generally fine with the information provided. I have only two comprehension questions: (1) Concerning notifications that are related to payment instructions: Do they analogously apply for payments related to former ASI 2 and 3 procedures, i.e. for those former ASI procedures that prospectively will make use of the normal payment functionality? (2) Concerning "AS related notifications": Does the information provided apply to all AS procedures or does it apply only to selected procedures? In the latter case, we propose to explicitly mention those procedures that are relevant.	(1) Please note that notifications related to payment instructions cover also payment instructions related to former settlement procedures 2 and 3. (2) Contrary, "AS related notifications" apply only to the remaining settlement procedures 4, 5 and 6 (new terminology A-D). The presentation has been updated accordingly.	Clarification	AS related notifications
15	• In the context of our NSG consultation of this presentation, one of our ancillary systems was in favour of going into the direction that also a third party should be able to get notifications based on a contractual agreement between the account owner and the third party. Background for their proposal was the experience with T2S where for some messages this had not been envisaged right from the beginning but had to be implemented afterwards.	Please note that the presentation deviates from the current URD and UDFS documents. In detail, the message subscription for "another party" is lacking a use case and hence is a candidate for de-scoping. An URD CR will need to be raised to remove the reference of message subscription for "another party".	Question	Principles - Another Party

#	Comment	Response	Category	Sub-Category
16	Happy to confirm the proposed approach will meet our institution's requirements. The optionality to subscribe to messages "on a need to know basis" is in particular much appreciated. However, the team is expecting camt.054 to be requested (subscribed for) by all member banks for the following messages and therefore wonders whether it would not be easier to consider providing those as a default (mandatory) service, rather than optional: Slide No 6; item #6 Bank To Customer Debit Credit Notification (camt.054): A mandated payment by the responsible central bank delivery to the account owner A connected payment by the responsible central bank delivered to the account owner A FIToFICreditTransfer (pacs.009) send by an AS delivered to the account owner	Thank you for the provided comment. Please note that to our understanding the mandatory subscription of camt.054 would not meet the user requirements of other participants. In order to address these user requirements, the proposal is to allow every participant to select which business cases will trigger a camt.054 message, i.e. all business cases, no business case or a subset of business cases.	Mandatory vs. Optional Distribution	camt.054
17	regarding to the feedback of my TCCG colleagues, I think it would be fine to have a slot/ discussion on the slides at our next meeting.	Thank you for your comment. Please note that the slides used in the written consultation will be part of the September TCCG meeting.	Clarification	General comment
18	Concerning this written procedure on message subscription for notifications, we would like to propose that message for Return Account (camt.004) and RGBI (camt.021) should be defined as they are now for Interfaced AS settling in subaccounts, (i.e. camt.004 after SoC & EoP, camt.021 after SoP & EoC) as we consider its current behavior is optimized. We have inserted our comment in page 8 of the attached presentation.	Thank you for your comment. Please note that the slides have been updated accordingly.	Clarification	camt.004 and camt.021 (AS)
19	Page 6 point 6 - 'A FIToFICreditTransfer (pacs.009) send by an AS (NB: notification send to account owner of debited account)' A "pacs.009" is a payments message and therefore it is used totally different than a notification "camt.054". A "pacs.009" is simply not a notification. The "pacs.009" will be routed to the payments system of the bank and there it must be processed and documented. Banks cannot ignore a payments message. The "camt.054" would be routed to the booking system and it could be processed only if really needed. You see there is a fundamental difference between these two messages and therefore only the "camt.054" is the correct message for this purpose.	Please note that that a FIToFICreditTransfer (pacs.009) send by an AS will trigger the standard reporting of a pacs.009 FIToFICreditTransfer, i.e. the debtor will receive a camt.054 and the creditor receives a pacs.009 according to HVPS+. The message content of the pacs.009 will allow the creditor to identify that the payment was initiated by an AS. In detail, the forwarded pacs.009 message will contain the code word "ASTI", the message will contain an additional party "DebtorAgent" quoting the AS as well as the message will be sent with "urgent" priority. Following the discussion in the last July TCCG meeting, a presentation addressing open questions has been prepared on this subject and is part of the background documentation of the September TCCG meeting.	AOB	AS Payments - camt.054 vs. pacs.009
20	For us the field distribution is unclear. Is really every message mandatory or only mandatory if a bank use A2A? For example if a bank is not sending a "camt.005" then the bank will not receive "camt.006", correct? Or if the bank is using the GUI (U2A) for the command "GetTransaction" then the bank will not receive a "camt.006"?	Please note that the presentation aims at describing the message subscription of A2A messages only. Therefore we would like to confirm your understanding, i.e. banks which do not use camt.005 query messages will also not receive camt.006 response messages. Also the GUI (U2A) channel will not trigger A2A response message to the respective bank. Contrary, the bank will receive an U2A response via the GUI.	Mandatory vs. Optional Distribution	A2A vs. U2A