1.3.3. Description of the entities
Each Cash Account is linked to its relevant Owner Party and Currency. Could you please clarify how participants can request this ad hoc propagation? We understand that only the TIPS Operator could trigger an ad hoc propagation?

1.3.4. Access rights management
The links between a User and a Certificate DN also contain a "Default" flag specifying whether the Certificate DN identifies the default User associated to the related Distinguished Name and a "Main User" flag specifying that it is the single User enabled for the TIPS Service. Could you please elaborate on the definition of Main User, does the user- certificate DN link marked with main user flag imply that the User only has access to the TIPS Service as opposed to the T2S service?

1.4.4.2. Structure
Is row three of this table necessary? For example, assuming the user BIC is a BIC belonging to a party BIC then rows three and four would reflect the same BIC. What is the need for the information in row three which can be deduced by the difference between row 1 and 3 of the table would be the same, whereas row 4 would be included in the TIPS General Ledger. If compression, with which compression method?

1.6.1. TARGET2-Securities
Service-specific objects which only have meaning for one service (e.g. Authorised Account User and DN-BIC Routing for CRDM, TIPS, Securities and CSD Account Links for T2S). These objects can only be viewed and maintained from the CRDM interface and have no bearing on the T2S application. Please could you check? We think that some objects (Securities and CSD Account Links for T2S) can be viewed and maintained not only from the CRDM interface.

1.7.2. Data propagation between CRDM and TIPS
As such, the current version of CRDM does not allow to change these attributes. Consequently, all the users and parties linked to the role are not linked anymore to the privilege, with immediate effect.

1.7.3. TARGET Instant Payment Service
No data propagation flows exist from TIPS to CRDM; data modified in TIPS does not influence the existing data in CRDM. It could be useful to clarify this aspect also in the TIPS UHB and UDIFS.

1.7.4. Limits
Limits can only be modified in TIPS. Once the limit is changed in TIPS, the user still sees in CRDM the old limit. If this understanding is correct, then we propose to make clear in the CRDM user interface that the value only refers to the "initial limit" of the CMB, and not to the current limit (i.e. by using appropriate labels/warnings).

1.8.3. TARGET Instant Payment Service
If compression, with which compression method? If the latter, how can they be recognized?

1.9.1.3.2. Structure
The table shows that we will have the same behavior also for Blocking status for TIPS Participants, Blocking status for TIPS Accounts and TIPS Credit Memorandum balances.

1.9.1.4.3. Generation
TIPS Actors may receive the TIPS Directory in two ways...

1.10.4.4.3. Generation
TIPS Actors may receive the TIPS Directory in two ways...

2.3.2. TECHNICAL SPECIFICATION
Not in the original text - About compression, if the data is compressed or not, will both (uncompressed and compressed) be available?

3.2. TECHNICAL SPECIFICATION
For these reasons the Data Migration Tool (DMT) was chosen as a solution to allow a massive upload of several reference data objects. Typos: For these reasons the Data Migration Tool (DMT) was chosen as a solution to allow a massive upload of several reference data objects.

5 INTRODUCTION
Diagram 12 DMT interaction

6 INTRODUCTION

7 INTRODUCTION

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FEEDBACK TO CG
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12 1.2.2.1.2. Privilege

Table 2 - Privilege Table 4 - Privilege "Dedicated Cash Account"

The information provided in Table 2 seems to be different from the information provided in CR 674: "DN BIC Routing (new) - Operator, Central Bank"

Clarification No specific feedback to be provided to the CG.

12 1.2.2.1.2. Privilege

Table 3 - Create Technical Address Service Links Technical Address Service Links

The information provided in Table 3 seems to deviate from the information provided in CR 674: "Technical Address Service Links - Operator, Central Bank"

Clarification No specific feedback to be provided to the CG.

12 1.2.2.1.2. Privilege

Table 4 - Privilege "Dedicated Cash Account"

Do you mean "Delete Cash Account"?

Accepted No specific feedback to be provided to the CG.

12 1.2.2.1.2. Privilege

Table 5 - BIC Query Service List Query

Please explain who exactly can use the BIC query and where the details can be found as it is not entirely clear to us what the relevant U2A query in the CRDM UHB is. The same is true for the Service List Query. Where is this query described in the CRDM UHB?

Accepted No specific feedback to be provided to the CG.

12 1.2.2.1.2. Privilege

Table 6 - Create DN-BIC Routing Payment Bank

Please check to see if relevant adaptations to this section are necessary due to CR003 / CR004 which need to be added to the CR documents and which need to be included here once the CRs are approved.

To be clarified by the user No specific feedback to be provided to the CG.

12 1.2.2.1.2. Privilege

Table 7 - BIC Query Service List Query

Taking into account the information provided in section 1.7.2 it seems that the modification of "thinking" and "CMB Limit" can only be done in TIPS directly (ie change of local reference data). Although the approach might avoid inconsistent databases, it seems that the information provided here is not in line with the TIPS UDF's ("Blocking/unblocking status and CMB limit data maintenance operations are also available in the CRDM – refer 1.6.3 "Common Reference Data Management" for additional information"). Please check and if needed a CR should be raised/approved asap.

Clarification No specific feedback to be provided to the CG.

12 1.2.2.2.2. Configuration of privileges

Table 14 - Description of privileges for Payment Banks

What is the sense of granting a privilege with deny = true to a party? This would mean no user of this party can get it so the privilege is completely senseless. Please clarify.

Clarification No specific feedback to be provided to the CG.

12 1.2.4. Graphical user interface

Table 20 - Create report configuration, update report configuration, delete/restore report configuration, query report configuration list, query report configuration details

Additionally central bank should be able to act on behalf of a payment bank.

Clarification No specific feedback to be provided to the CG.

12 1.2.4. Graphical user interface

Table 20 - Create DN-BIC Routing Payment Bank

The information provided here seems not entirely in line with the information provided in the previous section / CR 674. Please check.

Clarification No specific feedback to be provided to the CG.

12 1.2.4. Graphical user interface

Table 20 - Create DN-BIC Routing Payment Bank

The information provided here seems not entirely in line with the information provided in section 1.7.2. It is not entirely clear how the access rights check is conducted. In order to upload a DMT file, the necessary privilege is needed. We are assuming that the privilege to do certain activities are checked in a second step. Nonetheless, it is not clear how NRO is ensured / needs to be ensured in case of DMT usage.

Accepted No specific feedback to be provided to the CG.

12 1.2.5. Security

Table 20 - Create DN-BIC Routing Payment Bank

It is not entirely clear how the access rights check is conducted. To be included here is the relevant U2A query in the CRDM UHB.

Clarification No specific feedback to be provided to the CG.

12 1.3.2.1. Data Model of the component

Table 20 - Create DN-BIC Routing Payment Bank

As far as Payment Banks are concerned, when they are linked to the TIPS Service, the relevant Central Bank must specify whether the Payment Bank participates in TIPS as a TIPS Participant or as a reachable Party.

Clarification No specific feedback to be provided to the CG.

12 1.3.2. Party data management

Table 20 - Create DN-BIC Routing Payment Bank

As already addressed during the last round of comments, the party Type "Payment bank" is not know in the TIPS UDF's. In order to ensure a consistent description, it is of utmost importance that terms are used in a consistent manner. This is currently not the case. It seems that either a CR is needed so the description here needs to be aligned to the wording used in the TIPS UDF's.

Clarification No specific feedback to be provided to the CG.

12 1.3.3.1. Data model of the component

Table 20 - Create DN-BIC Routing Payment Bank

CMB (is CMB for / is reference for CMB)

Could you let us know how this is implemented, as there is no other field, where this reference could be stored. So will there be an additional table where these references are stored?

Clarification No specific feedback to be provided to the CG.

12 1.3.7. Report configuration

Table 20 - Create DN-BIC Routing Payment Bank

We understand that payment banks can use the GMT only for the CMB creation. Please confirm and be so kind as to add a footnote for clarification.

Rejected No specific feedback to be provided to the CG.

12 1.4.3. Common reference data maintenance process

Table 20 - Create DN-BIC Routing Payment Bank

Cash account data management

We understand that payment banks can use the GMT only for the CMB creation. Please confirm and be so kind as to add a footnote for clarification.

Clarification No specific feedback to be provided to the CG.
1.4.3.3. Validity of common reference data objects

BIC Directory

Just for clarification. What exactly is the difference between the “BIC Directory” in CRDM and the “TIPS Directory”? We understand that the first one is the SWIFT BIC Directory and different from the TIPS Directory. However, in section 3.5.3.3, column 6 as possible values the BIC Directory is mentioned. We assume that PDS Directory is meant here. Please be so kind and to check the document and update the document to the extent necessary.

1.4.4. Structure

This BIC identifies one and only one TIPS Account or CMB in TIPS

It may be clearer to say “This BIC is linked to”…?

1.4.4.2. Structure

Field no 3 - Party BIC

It is the view of the drafting group for the T2 Guidelines that only BICs can be configured as Authorised Account Users that identify a Participant or Reachable Party. (see Title III, Article 12, No 3 of the DMT Annex II to 3. The TIPS-DCA holder shall register an authorized account user for settlement purposes. It shall only register its own BIC and/or that of a reachable party as authorized account user.)

Could you please check if in consequence the User BIC automatically is always identical to the Party BIC? If yes, field no 3 in the TIPS Directory would be redundant and should be eliminated. If not, could you please provide an example of a correlation where these two fields could contain different BICs.

1.4.4.4. Distribution

The name of the flat file that contains the TIPS Directory is as follows: TIPS\WTYYYYYNMDD

In the TIPS CG, the possibility of an ad hoc intraday update and distribution in exceptional circumstances has been discussed. If this is an option, we suggest to extend the file name with an additional digit in order to include a version number.

1.5.1. TARGET2-Securities

Categorised shared objects which are used in both services but each instance has a specific link to a single service (e.g. Cash Accounts, Limits). These objects can be created and maintained from both the CRDM and the TIPS interface, however instances related to CRDM cannot be viewed or created/maintained from the TIPS interface and are not taken into account by other T2S application processes.

Does this mean on the opposite that from TIPS T2S objects can be viewed/created/maintained? If not may be this could be added.

1.5.2. TARGET2

The CRDM Operator, in any case, has the ability to perform CRDM-specific updates on individual BICs.

We assume that this includes the possibility to add BICs that are not published in the SWIFT BIC Directory but shall be used in TIPS payments as requested by the BIC holder. Could you perhaps mention this possibility explicitly here, as an example? We think this could be an important information for banks which currently use unpublished BICs in SEPA payments.

1.5.3. TARGET Instant Payment Service

No data propagation flow exists from TIPS to CRDM, data modified in TIPS does not influence the existing data in CRDM.

In CRDM overwriting this modified data then?

1.7.1.2 Data propagation between CRDM and TIPS

The concurrent change of this data on either side (CRDM and TIPS), taking into consideration the delayed propagation of data from CRDM to TIPS, could lead to inconsistent and unexpected results. As such the current version of CRDM does not allow to modify these attributes. While it is possible to set a value for Limits upon creation, this value is propagated to TIPS only as an initial limit value. Following the initial propagation in TIPS, Limits can only be modified in TIPS.

As already mentioned we understand the approach chosen here but it is not in line with the already approved documentation. Therefore, either a CR is urgently needed or the CRDM UDFS needs to be updated in line with the TIPS UDFS which is already approved and the basis for the acceptance testing. If this is not done, the current draft is not in line with the approved scope defining documents and needs to be updated.

1.7.3. Archiving management

For this reason, and until the deployment of the fully-fledged CRDM, it has been chosen to avoid purging logically deleted data from the database. Specifically, this means that the retention period (currently set to three months) is extended indefinitely for reference data objects that are also used in CRDM.

Would the result of this decision be, that we wouldn't be able to issue a deleted accounting number or user name until 2021?
1.7.3. Archiving management

The absence of a long-term archive in CRDM would entail that keeping the purging mechanism leads to data being removed for good from the system. For this reason, and until the deployment of the fully-fledged CRDM, it has been chosen to avoid purging logically deleted data from the database. Specifically, this means that the retention period (currently set to three months) is extended indefinitely for reference data objects that are also used in CRDM. These objects include Party, Technical Address Network Service Link, Party Service Link, Cash Account, Authorised Account User, Limit, Role, User, DN-BIC Routing, User-Certificate DN Link, Certificate DN, Message Subscription Rule Set, Message Subscription Rule, Restriction Type, Report Configuration.

We do not question the approach chosen if it is feasible in terms of performance for T2S. However, please note that neither the TIPS URD nor the TIPS UDFS refer to any intermediary solutions. Having in mind that the acceptance test are done based on the approved functional documentation, a CR seems necessary in order to ensure that we have a consistent functional documentation.

2.1.2.2. DMT File Validation

CRDM performs a technical validation on the uploaded file to ensure that the technical constraints have been respected. Will this technical validation include the check, if the sender of the file have the access rights to create the specific static data? If not, how will the TIPS operator check, if a participant have the needed access rights to create static data in the data scope? If such a check is not implemented, a participant could create or change static data for a different participant.

Clarification

No specific feedback to be provided to the CG.

2.1.2.5. DMT File Results Provisioning

Once all of the records in the uploaded file has been sent and processed by the back module which provided the related result, the DMT File Result is consolidated.

Grammar: Once all of the records in the uploaded file have been sent...

Accepted

No specific feedback to be provided to the CG.

3.1. INTRODUCTION

The data can be produced in Excel or flat file format by the user and submitted to CRDM via a web application.

As already mentioned an approved CR is urgently needed as the current TIPS URD refer to an A2A access to CRDM, but not to DMT.

Where will we find further details on the application mentioned here? Moreover, does ESMIG play a role?

Clarification

No specific feedback to be provided to the CG.

3.5.3. Common Reference Data

General

The list 3.5.3.1 - 3.5.3.16 contains all descriptions for “New” reference data. Is the same format to be used in order to update existing data?

Clarification

No specific feedback to be provided to the CG.

3.5.3.1. Party Reference Data - New

4 D Type Possible values: - PMBK - Classification of the party: - PMBK = Payment bank

Please be so kind as to explain why the payment bank is mentioned here and not the CB of the respective payment bank.

Clarification

No specific feedback to be provided to the CG.

3.5.3.9. Report Configuration - New

BIC Directory "BIC Directory" or "TIPS Directory"?

Accepted

No specific feedback to be provided to the CG.

3.5.3.12. Cash Account

We assume that an appropriate access right check ensures that banks can only create CMBs. Please confirm.

Clarification

No specific feedback to be provided to the CG.