

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Swedbank response to ECB consultation regarding TIPS  
**Date:** 24 February 2017 13:49:11  
**Attachments:** [tips-template for document review - Swedbank.xlsx](#)

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Dear all

We understand that it is the responsibility of the Eurosystem and the ECB to ensure that EU has an efficient payment market infrastructure on which payment services can be delivered by PSPs on a level playing field. However we do not see that the initiative, TIPS, taken by ECB is in line with this responsibility nor do we see a failure in the market that would require ECB to decide to become a service provider instead of remaining an overseer and facilitator. Our summarized view on this is;

- Swedbank expectation on the work initiated by ECB was a delivery of a cost efficient real time settlement solution with the capacity to provide settlement services for Instant Payment processing; low as well as high volume, for a variety of different schemes. This is unfortunately not what has been presented by ECB in the TIPS solution
- Swedbank expect ECB to provide a level playing field in the euro clearing & settlement market. TIPS is not supporting this as it based on advantages in liquidity usage efficiency and cost for TIPS which ECB is not granting any other IP provider in the settlement service ECB provides for IP.
- Swedbank expects that providers of IP processing and clearing platforms will adhere to the SEPA End date regulation and ensure that the solution provided is interoperable with equivalent ones. This is as far as we can see not catered for in the solution ECB is providing.

Swedbank is in the forefront of innovation and are one of the founding banks of a pan European Instant Payment scheme with potential to create extremely wide reach. For cost efficiency reasons we as a bank refrain from investing in several solutions meeting the same need. We see that the proposal from ECB introduce a risk for Swedbank to be forced to invest and participate to two parallel IP infrastructures; hence moving the obligation to ensure EU wide reach from ACHs and other IP scheme providers, ECB being one onto the bank.

Swedbank encourages ECB to focus on developing cost efficient settlement solution to support innovative IP schemes provided by ACHs or other scheme providers. This to allow banks to take full advantage of the investments made and to , instead of investing in parallel infrastructures, focus on delivering easy to use and readily available payment solutions to EU citizens and companies.

The market consultation on interest and usage of TIPS is sent in a separate mail to you and to Bank of Finland.

The market consultaion on the TIPS User requirements can be found attached.

Kind regards

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