European Payments Council

Response template: VOP Scheme Rulebook Change Request for v2.0 Public Consultation (document EPC085-26)				Name respondent: f.vanbeers@betaalvereniging.nl mat.wilson@ING.com	Please insert organisation name here **Dutch Payments Association**
CR#	**Contributor**	**Change request title**	**EPC VOP WG recommendation**	**Do you support the EPC VOP WG recommendation?**	**Comments regarding (non-)support of the EPC VOP WG recommendation**
1	Banque Internationale à Luxembourg	Bulk standardisation process	e) The change request cannot be part of the scheme.	YES	
2	Slovak Banking Association	VOP bulk process	e) The change request cannot be part of the scheme.	YES	
3	Banco de Portugal	Bulk process	e) The change request cannot be part of the scheme.	YES	
4	SurePay B.V.	Special characters	e) The change request cannot be part of the scheme. But a JSON conversion table for the special characters will be included in the API specifications.	YES	VOP WG recommendation supported by the majority, with one PSP objecting with the following comment: We support the clarification that special characters should be accepted and must not directly lead to 'no match' of rejection of VOP requests. The name should be assessed as provided by the payer, with the responsibility for matching clearly placed on the responding PSP/RVM, as they are best positioned to handle normalization and local character-set specifics. However, for usability and downstream processing, any returned name suggestion should be restricted to the Latin character set. This ensures that, if a name is adopted, it does not introduce failures in subsequent payment execution flows.
5	Banfico	No Non-Latin Alphabet Mapping/Conversion on the Requester Side	e) The change request cannot be part of the scheme. But a JSON conversion table for the special characters will be included in the API specifications.	YES	See comment on #4
6	LUXHUB	Extended character set	e) The change request cannot be part of the scheme. But a JSON conversion table for the special characters will be included in the API specifications.	YES	See comment on #4
7	PSA for the Austrian Community	More details should be provided in case of NOAP	c) The change request should be included in the scheme as an optional feature, subject to LSG validation. Please indicate whether you agree with the set of error codes recommended by the VOP WG.	YES	
8	Banfico	Addition of Granular NOAP Response Codes	c) The change request should be included in the scheme as an optional feature, subject to LSG validation. Please indicate whether you agree with the set of error codes recommended by the VOP WG.	YES	Agree with the set of error codes as recommended by the VOP WG, with the exception that options MD07 and NARR should be removed.
9	Banfico	HTTPS Code Updates	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly. Please indicate whether you agree with the HTTPS codes recommended by the VOP WG	YES	Agree with the set of error codes as recommended by the VOP WG, with the exception that options MD07 and NARR should be removed.
10	PricewaterhouseCoopers Česká republika, s.r.o.	Maximum Execution Time	e) The change request cannot be part of the scheme.	YES	
11	Italian Banking Association	VOP Dispute Resolution Process	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly, subject to DRC assessment.	YES	
12	Italian Banking Association	VOP Dispute Resolution Tool	No opinion	NO OPINION	The investment does not seem to justify to expected benefits.
13	Nordic Payments Council	Make the VOP scheme credit transfer scheme and currency agnostic	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly, subject to LSG assessment.	YES	
14	SurePay B.V.	Allow Verification of Payer (debtor) as an Additional Optional Service (AOS).	e) The change request cannot be part of the scheme, subject to LSG assessment.	YES	

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15	Citibank Europe Plc	Pre-Validation/Independent VOP Service	e) The change request cannot be part of the scheme, subject to LSG assessment.	YES	
16	VOP WG	Support Commercial Trade Name in VOP	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	NO	1. Change request not supported as it is described in the change request.The VOP matching process is performed based on the name provided in the request, which may be either the legal name or the commercial trade name. Introducing additional names in the response that were not part of the original request is not necessary for achieving an accurate matching outcome. 2. Including other CTNs not inputed by the Payer in the VOP request in the VOP response raises further complications, particularly in cases where multiple CTNs exist for a single payee. It is unclear which name should be returned if a payee has a large number of CTNs (sometimes up to 200). 3. PSR required changes are not definitive. Nor is it properly discussed how to cater for potential impact on the VOP process i.e. impact the VOP Rulebook. Regulatory required changes can be part of a regulatory update, after assessment by the VOP WG.
19	Banfico	Clarification on the Use of Lower Priority Endpoints in EDS	b) The change proposed by the VOP WG should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	NO	The use of fallback endpoints must remain, despite the fact that they are (luckily) not required often. Furthermore, PSPs wishing to use multiple RVMs must be able to do so, and, as a result, must be able to register multiple endpoints in the EDS. For that the original request by Banfico to better clarify how Lower Endpoints/ Multiple Endpoints can be used and supported in the EDS. NO is to the the view of the VOP WG recommendation to remove the option for fallback endpoints.
20	LUXHUB	Clarification when several API details are provided in the EDS	b) The change proposed by the VOP WG should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	see reply & comment on #19
21	Banfico	Reduction of EDS Update Effective Time	e) The change request cannot be part of the scheme.	YES	Yes supported by all, with one PSP neutral adding the following comment: Missing insight into how much friction the current 30-hour window creates. The existing process appears slow, so the proposal to reduce it to 10 hours seems reasonable.However, willing to follow the Working Group’s recommendation in this matter, as it is difficult to fully assess the benefits versus the impact.
22	VOP WG	Broadcasting capability in the EDS	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	YES	

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23	VOP WG	Search key in EDS based on IBAN instead of BICs	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	NO OPINION	No clarity on the impact of this change request for PSPs. How will the proposed solution work in case PSPs use multiple RVMs? Does the change impact justify the benefits, given the fact that the teething problems related to using the BIC have been solved?
25	VOP WG	Add an obligation for PSPs not using a RVM to provide statistics	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly, subject to LSG assessment.	YES	
26	VOP WG	Changes required for the adherence of non-EEA PSPs	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly, subject to the EPC's relevant decision-making bodies assessment.	YES	
27	VOP WG	Replace the EV TLS certificates by QWAC certificates	b) The change request should be incorporated into the scheme: the change request becomes part of the scheme and the rulebook is amended accordingly.	NO OPINION	No clarity on the impact for both PSPs and RVMs; does the change impact justify the benefits? And is the process to acquire a good working QWAC certificate for all involved solid and fit for purpose?