

Market Consultation
openFinance API Framework
Operational Rules Push Account Information Services

COMMENTS and RESULTS SHEET V1.00

Distribution: Publicly available

Document:			
Berlin Group openFinance - Operational Rules Push Account Information Services V0.91 CONSULTATION DRAFT 2021-02-17.pdf			
Comment (N° / ID)	Comment/question (when applicable with justification/rationale or reference section/page n°)	Suggested Resolution (alternative)	Agreed Resolution (Berlin Group)
G1	Section 4: Currently, only push of account entries is specified. However, SMEs / corporates need the account statements for bookkeeping. So, pushing the account statements (e.g. in form of a camt.053) would be an interesting usecase which is needed by many SMEs / corporates.	Specify pushing account statements" (e.g. in form of a camt.053).	Agreed for phase 2 of this service. Details like formats to be discussed later.
G2	Section 4: As far as I understand, the TPP establishing the push mechanism to receive account entries does not necessarily have an AIS licence. Is this true? If yes: are there any restrictions about the data he can receive (e.g. he cannot receive data of other legal entities or may not receive account entries belonging to regulated accounts).	Add 1 or 2 sentences giving an answer to this question.	This is a matter of compliance/implementation and cannot be covered by the standard.
T1	Section 4.1: Is there a global maximum duration of subscription? Can ASPSPs define an (individual) maximum duration?	Add 1 or 2 sentences giving an answer to this question. If ASPSPs can define an (individual) maximum duration an end endpoint is needed, which returns this information.	The actual validity will be part of the server response. The maximum duration will be published via the Discovery API, which is in the standardisation in parallel.
E1	Section 4: The specific requests and the data fields in this request are not described yet. (Probably they will be specified in the final document.)	Specify the specific requests and the data fields.	Implementation Guidelines will cover this in a next step.
1 / G	Evaluate the addition of the scenario (and related API service) in which TPP cancels subscription in case of PSU not fulfilling its duties (page 21)	Introduce an additional API service and its use case	Cancellation by TPPs is already supported.

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2 / T	The coding of business data (page 22) is up to the stakeholder (camt.05x, JSON, MT94x)	Introduce a defined standard for the coding of business data (page 22), in line with what has been done for "Extended payment initiation services" (page 21)	It was agreed that JSON is the minimum standard for account entries reports, others can be offered in addition. Preference is then steered by API client
3 / T	The operational rules do not contain specific requirements on data modelling on protocol level (page 25)	In order to standardize the market and create common guidelines for all stakeholders, it might be better to specify requirements on data modelling on protocol level	Implementation Guidelines will cover this.
4 / T	Offer the possibility of filtering by beneficiary, in order to distinguish payments made to a specific person, for example linked to a recurring subscription (page 27)	Provide "Beneficiary" field among the exchanged data, allowing the use of appropriate filters	Implementation Guidelines will cover this