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Rules for operating, joining and participating in the Standardised Proxy Lookup (SPL) service

(Approved by the Steering Committee of the Mobile Proxy Forum (MPF))

1. Scope of the SPL service

The SPL service will allow the exchange of the data necessary to initiate P2P mobile payments between proxy-based P2P mobile payment solutions on a pan-European level. It will facilitate interoperability between participating P2P mobile payment solutions.

In view of the tight deadline, and considering the lack of interoperability among existing mobile payment solutions, the strategy is to overcome the fragmented scenario with simple solutions at first by focussing on the linking of a mobile telephone number (proxy) to an IBAN. However, an open design should be ensured to allow support for additional proxy types and alternative payment account identifiers in a second phase.

2. SPL scheme

The goal of establishing an SPL would be to have operational proxy-lookup processes between participants who are Registry Providers (i.e. operate a service which relates a proxy to a payment account). This would require a scheme, describing the logic of these processes, and a service operator that runs the SPL according to the scheme rules. The scheme would need to have a clear governance framework.

The participants that wish to connect their proxy service to the SPL will have to comply with the SPL requirements for proxy services. The requirements also serve to ensure that the service performs in a predictable and orderly fashion, and with proper consumer protection.

3. (Meta) Governance

Define roles:

- SPL scheme manager.
- SPL service operator.
- Initiating Registry Provider (IRP): entity which makes a lookup request into the SPL.
- Responding Registry Provider (RRP): entity which responds to a lookup request from the SPL.

Define a governance and (initial) rules for each role for different relevant aspects including joining, participating and operating in this role.

Define core interactions between roles, including:

- Lookup request.
- Lookup response.
- Joining / leaving the scheme as an IRP.
- Joining / leaving the scheme as an RRP.

Define general principles that govern the design of the lookup service, for instance:

- The service is an on-line service for the purpose of real-time one-off lookups that are provided within established maximum response times.
- The service maintains an updated directory of participants and functions according to scheme-compliant processes that enables qualifying participants to join and leave the lookup service.
- All things being equal, a given lookup shall result in the same (identical) response with regard to the IBAN produced every time.
- The service will keep track of queries processed for the purpose of providing an audit trail to relevant parties involved.
- The service shall take (among other things) a proxy as an input, and will yield (among other things) an IBAN and certain information on the associated natural person of a quality defined in the SPL rules.
- Participants will ensure that (contractual and implicit) privacy expectations of end users (both on the sending and receiving end of transactions) are met and are in conformance with the SPL's charter on privacy for end-users.
- In order to realize interoperability, the SPL will define a list of minimum requirements for participating services, including but not limited to:
 - Guarantees about the accuracy of the revealed identity of the beneficiary in a lookup (is the result a real name, or can it be a nickname?).
 - Guarantees about the speed of propagation of changes to the proxy database (will a transaction reach the old IBAN or the new IBAN, shortly after changing the IBAN associated with a proxy?).
 - Procedures and assistance provided for cases of misdirected P2P transactions.
 - Transparency requirements for the benefit of IRPs with regards to what RRP has provided the response in a given lookup transaction.

4. SPL service rules

4.1 Rules for operating the SPL service

Core solution principles:

- a) SPL service only ever returns one IBAN in response to a lookup.
- b) In a scenario whereby multiple solutions have a claim on the same mobile telephone number, the polling hierarch logic as described in annex I will come into effect.

'Meta' Rules:

- a) Define monitoring of usage, to ensure proper use of the service, and to prevent unintended / fraudulent / improper usage (by PSP or PSPs end-customer).
- b) Describe the adherence procedure. How a "prospective" participant joins the SPL service, and who/how the new "prospect" is screened to comply with requirements and are approved to join.

- c) Describe the change management procedure/governance of the SPL service, and the related decision making procedure. How new functionality is proposed, evaluated and prioritised, decided to be implemented, and how the costs are shared.
- d) Describe dispute solving (e.g. between participants/scheme; e.g. consequences due to breach of SPL rules).
- e) Describe the procedure how a PSP/scheme may exit, or how it may be excluded, from the SPL service.
- f) Define requirements on information quality and format. Require strong authentication of users providing the information? Define validation rules for the data. Define data maintenance requirements, e.g. how to handle obsolete/abandoned proxies.
- g) Service fee principles of the SPL lookup service.
- h) Risk management and security aspects.

4.2 Rules for joining the SPL service

Participants wanting to join the SPL service should fulfil the following conditions:

- a) A participant may hold a European PSP licence in its own right or represent a group of similarly licenced PSPs through a scheme or service arrangement.
- b) A participant in the service may act as either an IRP or RRP or both.

4.3 Rules for participating in the SPL service

The below rules apply to the registered participants of the SPL service for initial launch:

- a) The lookup request function can be done by anyone who fulfils the SPL service membership requirements and is a registered participant in the service.
- b) Participants should ensure that all required consents have been collected for any information disclosed via the SPL service. The method to do this should be compliant with local standards where the information is collected
- c) Before a proxy can be shared through the SPL service, the RRP must verify that the proxy is in control of the account holder (i.e. payee), or otherwise authorised by the possessor of the proxy to link it to the destination account.
- d) If the response is inaccurate (e.g. incorrect name) the RRP is liable.
- e) The IRP receiving information as a result from a SPL enquiry is under no obligation to disclose all of that information to their customers.
- f) Just because the SPL service has returned an IBAN there is no obligation on the IRP to complete the payment (for example if it would breach internal policy).
- g) In constructing the payment message (following the look-up) the IRP should include the recipient's proxy (any other information required?)
- h) Beneficiary category type indicator may be included in the lookup response. (Investment?)
- i) Lookups are allowed only for the intention to initiate a payment (e.g. SPL lookup service shall not be used for a phone number-name lookup service)
- j) The IRP shall provide an indicator for the payment message which indicates that the payment was generated using data provided by the SPL
- k) Include relevant requirements related to compliance with anti-money laundering, anti-terrorist financing, and sanction screening.

5. Change management process

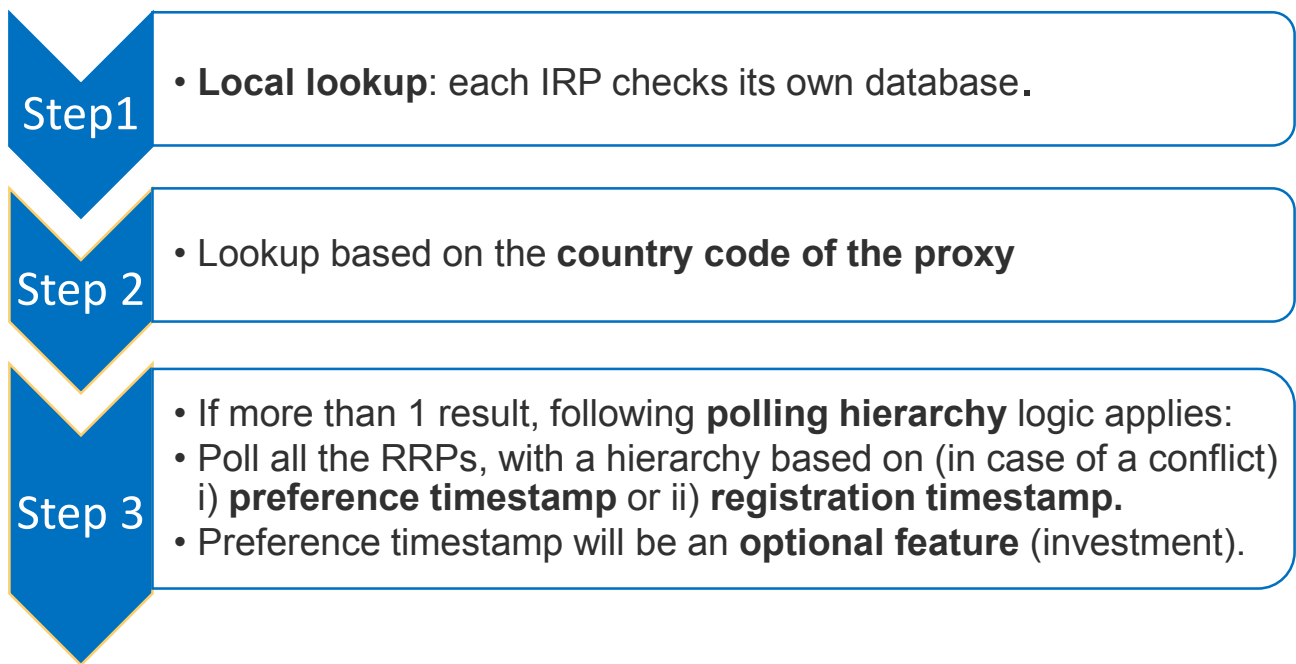
The Steering Committee will review from time to time and based on input from its working groups whether these rules need to be amended.

After implementation, sufficient time should be left to the market participants to adjust to any approved change.

6. Change log

Issue number	Date	Update/change
V1.0	30 March 2017	Approved by the Steering Committee

Annex I: Polling hierarchy logic



Supplementary rules related to step 3:

- There are two types of timestamps:
 - Preference timestamp (optional) is the time at which a preference was explicitly indicated by the customer (payee).
 - Registration timestamp (mandatory) is the time at which the customer registered with the service.
- RRP response should be provided within a reasonable timeframe. (e.g. within 1 second).
- 'Preference' relates to the fact that the customer opts in to receive payments into a specific account (explicit consent is required). This is only possible if the RRP has developed this additional feature.
- If only one RRP responds that has not build the preference feature then there is no conflict and the payment can be directed to this RRP (subject to rule 4.3 f).
- If there is a conflict then the payment will be directed to the RRP that has been selected as preferred or if there is no "preferred" status with the "registration timestamp" indicating the most recently registered account.
- If more than one participant (RRP) responds and they have both been selected as preferred then the preference timestamp will be checked. The payment will be directed to the RRP with the most recently preferred service.

(Note: the efficiency of the logic could for example be revisited after 1 year)