

EBA clarifications to issues I to III raised by participants of the EBA Working Group on APIs under PSD2

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ID	Topic	Description of issue	EBA clarification
I	Testing	<p>Several participants expressed concerns on the testing environment, and in particular the reliability of the testing platforms, the depth of use cases and data available, as well as the ease and speed of testing for third party providers (TPPs), including account information and payment initiation service providers (AISPs and PISPs) as well as card-based payment instrument issuers (CBPIIs).</p> <p>Some participants were of the view that TPPs should be able to carry out automatic testing, that the use cases catalogue should be as comprehensive as possible, that the APIs specifications should be machine readable and that the ASPSPs should provide adequate support for TPPs. The participants suggested that further guidance would be helpful.</p>	<p>Article 30(5) of the Commission Delegated Regulation (EU) 2018/389 (the RTS on SCA&CSC) states that “account servicing payment service providers shall make available a testing facility, including support, for connection and functional testing”. This means that account servicing payment service providers (ASPSPs) are required to provide support, and to do so for third party providers (TPPs) – account information service providers, payment initiation service providers and card-based payment instrument issuers (AISPs, PISPs and CBPIIs)- that are authorised or applying to be authorised.</p> <p>Article 30(3) of the RTS also states that ASPSPs shall make available the documentation containing the technical specification of any given dedicated interface, “specifying a set of routines, protocols, and tools needed by [PISPs, AISPs and CBPIIs] for allowing their software and applications to interoperate with the systems of the [ASPSPs]”. ASPSPs are not required, but may find it efficient and in their interest to enable TPPs to use automatic testing programs wherever possible and make documentation available in a machine-readable format. This is likely to minimise the support that ASPSPs may otherwise be required to provide to each TPP using the testing facility. Enabling a degree of automaticity may also enhance the participation rate of TPPs, facilitate better testing results and help ASPSPs achieve “wide usage” of their production interface, which may in turn be beneficial for the purpose of the exemption process as detailed in the EBA Guidelines on the conditions to benefit from an exemption from the fall-back mechanism (EBA/GL/2018/07).</p> <p>Guideline 6.5 in particular lists the elements that ASPSPs should allow authorised TPPs (or payment service providers that have applied to their competent authorities for the relevant authorisation) to test. Guideline 6.6, in turn, requires ASPSPs to provide a summary of the testing results to their competent authority (CA), including the number of TPPs that have used the testing facility and the feedback ASPSPs received from those TPPs. In addition, Guideline 6.7 states that the CA may also take</p>

			<p>into account any problems reported to it by PISPs, AISPs and CBPIIs in relation to the elements to be tested in accordance with Guideline 6.5. Furthermore, Guideline 7.2 requires the CA to take into account the results of the testing and how the ASPSP has resolved the issues raised by TPPs when assessing whether or not the ASPSP meets the wide usage condition.</p> <p>ASPSPs may therefore find it helpful to avail themselves of the test cases catalogues and other testing support material that the EBA understands has been developed by a number of API initiatives. Given the link between the testing phase and the wide usage criterion and to avoid issues that may otherwise arise in the production environment, ASPSPs may find it to be in their own interest to ensure that the functionalities and scenarios available for testing are as close as possible to the functionalities that will subsequently be offered in the production interface.</p> <p>Regarding the availability of the testing facilities, the EBA notes that the requirements on performance and availability under Article 32 RTS do not apply to the testing facility. That being said, Article 30(5) of the RTS requires ASPSPs to make available a testing facility, and the Guidelines require ASPSPs to provide information on the TPP usage of the testing facility and how the ASPSP has resolved the issues that may arise during testing and/or in the production environment. Therefore, if the testing facility does not function well, this will impact on the assessment of the ASPSP’s application for an exemption.</p> <p>However, as stated on page 32 of the Final report on the Guidelines, EBA and NCAs encourage TPPs to participate in the testing and to communicate any issues they experience with the test (or production) interfaces to the ASPSP so that the ASPSP can address those issues in a timely manner and develop a high-performing dedicated interface.</p>
<p>II</p>	<p>Aligning functionalities and data requirements between API initiatives (and APIs more generally)</p>	<p>Some participants raised the concern that data and functionalities available through API initiatives are not always aligned between different API initiatives. The participants suggested the EBA to design a survey to send to API initiatives to identify the data and functionalities available under each API initiative.</p>	<p>Article 30(3) of the RTS on SCA&CSC states that ASPSPs shall make available the documentation containing the technical specification of any given dedicated interface “no less than 6 months before the application date [of the RTS], or before the target date for the market launch of the access interface when the launch takes place after the [application] date [of the RTS].”</p> <p>This means that ASPSPs are required to make the documentation available no later than 14 March 2019. This, in turn, will facilitate transparency in the market regarding the functionalities offered through APIs, which should be helpful to TPPs. As stated in issue I above, ASPSPs may find it efficient and in their own interest to make the documentation available in a machine-readable format in order to minimise the need to provide support needed for each TPP using the testing facility and for the purpose of the exemption process. API initiatives may also wish to consider surveying the ASPSPs</p>

			implementing their respective specifications, software, and/or implementation tools and compare and publish the functionalities supported by these ASPSPs. This should further enhance transparency for all market participants, and TPPs in particular, regarding the functionalities available through each API and any divergences between ASPSPs using that API.
III	List of qualified trust service providers (QTSPs) issuing PSD2 eIDAS certificates	<p>Some industry participants were concerned that PSPs are not able to identify which QTSPs issue PSD2 eIDAS certificates on the QTSP list that is published by the European Commission on their website.</p> <p>They also raised concerns that there are apparently no QTSPs that offer PSD2 eIDAS certificates and that the list of the European Commission website is not in a machine-readable format. These participants suggested amending the content and the functionalities of the EU Commission’s website accordingly.</p>	<p>The EBA understands that the QTSPs listed on the website of the European Commission (https://webgate.ec.europa.eu/tl-browser) is already in a machine-readable format and contains detailed information for each QTSP. For a QTSP to become authorised, the entity is required to contact the national supervisory body and to go through a national accreditation procedure. However, the EBA also understands that the list does not specify whether a given QTSP provides PSD2 eIDAS certificates or not, given that the respective national supervisory bodies do not provide such information.</p> <p>Taking into account that the deadline for starting the testing the API interfaces of 14 March 2019 is approaching quickly and that market participants are interested in obtaining eIDAS certificates as soon as possible, the EBA has decided to approach the QTSPs listed on the above website and ask them whether or not they issue or intend issuing eIDAS certificates for PSD2 purposes, including test certificates.</p> <p>Having assessed the responses, the EBA understands that the following QTSPs issue eIDAS certificates for PSD2 purposes, as well as test certificates, (with additional information, including contact details, available on the European Commission website stated above):</p> <ul style="list-style-type: none"> - Aruba Posta Elettronica Certificata S.p.A. (Italy) - Buypass AS (Norway) - Evrotrust Technologies JSC (Bulgaria) - First certification authority, a.s. (Czech Republic) - InfoCert S.p.A. (Italy) - Krajowa Izba Rozliczeniowa S.A. (Poland) - LuxTrust S.A. (Luxembourg) - Microsec Micro Software Engineering & Consulting Private Company Limited by Shares (Hungary) - MULTICERT - Serviços de Certificação Electrónica S.A. (Portugal) - NETLOCK Informatics and Network Privacy services Limited Company (Hungary)

			<p>The following additional QTSPs issue test certificates for PSD2 purposes, but have not started issuing PSD2 eIDAS certificates yet:</p> <ul style="list-style-type: none"> - Bundesdruckerei GmbH (D-Trust GmbH) (Germany) - FINA - Financijska agencija (Croatia) - CERTSIGN S.A. (Romania) - Bank-Verlag (Germany) <p>Around 10 of the above QTSPs informed the EBA that they issue/intend issuing eIDAS certificates for PSD2 purposes and test certificates to TPPs (and applicants) that are authorised/registered in another Member State different from the country where the QTSP is established.</p> <p>The above list is not exhaustive and only correct at the time of publication on 11 March 2019. There may be other QTSPs authorised in the EU that issue eIDAS certificates for PSD2 purposes. The EBA also understands that several additional QTSPs intend issuing eIDAS certificates for PSD2 purposes and test certificates in the near future.</p>
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