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De Nederlandsche Bank N.V.  
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25 September 2019

Dear Petra,

**Re: Response to Consultatie van de Q&A Klantreis zonder obstakels inzake  
betaalinitiatie- en rekeninginformatiediensten via derde partijen**

The EMA is the EU trade body representing electronic money issuers and alternative payment service providers. We have been operating for almost 20 years, and have over 65 members authorized in several EEA Member States. Our members include major global e-commerce businesses, Fintechs, payment remittance service providers, prepaid card issuers, acquirers, and AIS/PIS service providers operating across the EU, most frequently on a cross-border basis. Most EMA members qualify as ASPSPs, and several are also PIS and AIS providers.

A list of current EMA members is provided at the end of this document.

The EMA welcomes the opportunity to provide a response to De Nederlandsche Bank's consultation on the Q&A regarding Customer Journey Obstacles for Third Party Payment Initiation and Account Information Services. Our comments are set out in the Annex to this letter.

Yours sincerely,

Dr Thaer Sabri  
Chief Executive Officer  
Electronic Money Association

## Annex: Response of the Electronic Money Association

### Expanding DNB guidance

The EMA welcomes the development of advice by the DNB that expands on the guidance provided by the EBA (*Opinion of the EBA on the implementation of the RTS on SCA and CSC*, EBA-Op-2018-04) on what might be construed an obstacle under Art. 32 of the *RTS on SCA and CSC* (CDR 2018/389). The proposed Q&As and supporting examples of customer journeys can provide valuable illustrations to ASPSPs of possible obstacles that their redirection journeys might create for TPPs providing services. However, by their nature, a list of examples will always be incomplete and open to interpretation by industry participants.

In order to create a basis for supervisory clarity, for both ASPSPs and TPPs, we would suggest that the DNB's guidance on efficient redirection journeys is expanded to take the form of **minimum quality standards** for any redirection-based PSU Authentication flows. Common minimum standards will (i) Provide a basis for consistent mutual understanding of the DNB's expectations of all customer journeys involving Redirection and (ii) Ease the ability of the DNB to assess and verify the compliance of industry participants.

The minimum quality standards could comprise specific, quantifiable parameters related to the authentication method applied in an ASPSP payment account access interface such as:

- **Steps:**
  - Maximum number of screens to navigate to access the payment account in happy/unhappy flow scenarios depending on access method (browser, mobile app, POS, smart devices, etc),
  - Maximum number of PSU interactions (clicks) required by PSU to conduct authentication.
- **Delay**
  - Time to initiate redirection request(s) (i.e. to trigger SCA),
  - Time to return the PSU to the TPP domain after receiving the required SCA elements,
  - Time to complete SCA (in realistic happy/unhappy flow scenarios).

Any minimum quality standards for ASPSP payment account access interfaces should also consider the performance/characteristics of the direct access interfaces used by ASPSP users. It is appropriate that TPPs receive access that matches the performance of PSU direct access interfaces - deployed by ASPSPs - across defined minimum quality standard components.

Further we would argue that any minimum quality standards for authentication flows should also include guidance and quantifiable metrics for non-redirection customer

journeys. This would be to the benefit of ASPSPs and TPPs; ASPSPs can innovate their authentication customer journey with flexibility and the understanding of DNB's expectations, while TPPs can offer services to existing customers with minimal disruption and devise new payment propositions which may not be possible if redirection is the only customer authentication model available (such as at POS or via smart devices).

### **TPP customer experience**

Prior to the implementation of PSD2, TPPs have developed efficient customer journeys that are based on minimising customer friction at the point of payment or during payment account access. Where ASPSPs have now implemented a redirection-based PSU authentication method in their payment account access interface, TPPs are facing significant obstacles in migrating existing customers to such new interfaces without negatively impacting their existing customer experience.

The EMA would therefore urge DNB to consider the experiences of these TPPs, and avoid a mandatory migration of existing customers to ASPSP payment account interfaces that employ Redirection in the future development of "*examples of efficient and inefficient customer journeys*" and ultimately of minimum standards for redirection customer journeys as advocated in the Consultation notice. Where possible, the guidance and minimum quality standards put forward by DNB should seek to mirror current best practices among TPPs and to minimise screens and customer clicks for customer authentication in all customer journeys, redirection and non-redirection.

## List of EMA members as of September 2019:

[AAVE LIMITED](#)  
[Airbnb Inc](#)  
[Airwallex \(UK\) Limited](#)  
[Allegro Group](#)  
[American Express](#)  
[Azimo Limited](#)  
[Bitstamp](#)  
[BlaBla Connect UK Ltd](#)  
[Blackhawk Network Ltd](#)  
[Boku Inc](#)  
[CashFlows](#)  
[Circle](#)  
[Citadel Commerce UK Ltd](#)  
[Coinbase](#)  
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[Curve](#)  
[eBay Sarl](#)  
[ePayments Systems Limited](#)  
[Euronet Worldwide Inc](#)  
[Facebook Payments International Ltd](#)  
[First Rate Exchange Services](#)  
[Flex-e-card](#)  
[Flywire](#)  
[GoCardless Ltd](#)  
[Google Payment Ltd](#)  
[IDT Financial Services Limited](#)  
[Imagor SA](#)  
[Intuit Inc.](#)  
[Ixaris Systems Ltd](#)  
[Moneyhub Financial Technology Ltd](#)  
[MuchBetter](#)  
[myPOS Europe Limited](#)  
[Nvayo Limited](#)  
[One Money Mail Ltd](#)  
[OpenPayd](#)  
[Optal](#)  
[Park Card Services Limited](#)  
[Paybase Limited](#)  
[Paydoo Payments UAB](#)  
[Payoneer](#)  
[PayPal Europe Ltd](#)  
[Paysafe Group](#)  
[PPRO Financial Ltd](#)  
[PrePay Solutions](#)  
[QIX Ltd](#)  
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[SafeCharge UK Limited](#)  
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[Soldo Financial Services Ireland DAC](#)  
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