

From: Ruth Mitchell
Subject: SEPA Instant Credit Transfer Rulebook - 2020 Change Request Public Consultation (EPC002-20)
Date: 9 June 2020 at 15:55
To: change-request.EPC-scheme@epc-cep.eu

RM

Dear EPC,

In reply to your SEPA Instant Credit Transfer Rulebook 2020 Change Request Public Consultation, we would like to provide the following feedback.

The creation of European Retail Payment solutions based on SCT Inst requires some additions to its rulebook, which have been proposed by EuroCommerce, notably:

- #36 New service 'Initial payment with unknown final amount'
- #37 New service 'instalment payment'
- #38 New service 'instant customer refund'

Without these additional features, and maybe more to come, it will be rather challenging for such payment solutions based on SCTInst to compete with cards and wallets. We do not agree that the EPC SEMWG recommendation to defer such functionalities to the new RTP scheme would serve the same purpose as these changes, because this would force RTP schemes or frameworks, e.g. PSD2-based or OBePs, to have to replicate these functionalities, or participate in the EPC RTP scheme. Participating in both the SCTInst and RTP scheme to deliver payment functionality which consumers and merchants require seems overly elaborate, drives up operational cost, and ultimately affects competition in the market. We therefore support these change requests being adopted in the SCTInst Rulebook.

Also, the rapidly increasing use of IBAN proxies such as tokens, mobile numbers and email addresses, requires further adjustments to the Rulebook as suggested by the Nordic Payments Council:

- #39 Transmission of alias or proxy details about Originator and Beneficiary

Rather than rejecting this now, as recommended by the EPC SEMWG, due to the current unavailability of the 2019 version of the ISO 20022 standard, this change should be implemented as soon as reasonably possible, and at the latest in combination with the recommended migration of all SEPA schemes to the 2019 version of ISO20022 (#20), which we support, and which should maybe prioritise SCT Inst.

We hope this explains our concerns and suggested remedies, but please do not hesitate to contact us as needed for further explanations.

Regards,
Ruth

Ruth Mitchell
Electronic Money Association
www.e-ma.org
