



Latvia's

Comments on Change Request for the SEPA B2B Direct Debit Scheme

(Responses by e-mail to: info@europeanpaymentscouncil.eu or by mail to the address at the foot of this page)

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Your reference:	001.4.5.-08/2010/18
Scheme:	SEPA Business-to-Business Direct Debit Scheme. EPC222-07 version 3.0 (effective November 2011)
Date:	16 August 2010
Deadline:	19 August 2010
For information:	This template is provided by EPC to allow any person or organisation to comment on the suggestions for making changes to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' available on the EPC Website: http://www.europeanpaymentscouncil.eu/knowledge_bank_detail.cfm?documents_id=155



1 GENERAL

The suggestions for changes received for the SEPA B2B Direct Debit Scheme due to take effect in November 2011 have been evaluated and the resulting recommendations are included in the attached document: EPC128-10.

2 COMMENTS

Your comments, in the form of answers to the following questions, are invited by the deadline of: 19 August 2010.

2.1 Overview of categories

The innovative suggestions for change have been categorized as follows:

a) **Already provided for** in the Scheme

- No action is necessary for EPC

b) The suggestion for change should be **incorporated into the Scheme**

- The suggestion for change becomes part of the scheme and the Rulebook is amended accordingly

c) The suggestion for change should be **included in the scheme** as an **optional feature**

- The new feature is optional and the RB will be amended accordingly
- Each Scheme Participant may decide to offer the feature to its customers, or not.

d) The suggestion for change is not considered fit for SEPA wide use and could be handled as an **AOS** by interested communities

- The proposed new feature is not included in the Rulebook nor in the Implementation Guidelines
- The development of AOS is out of scope of the EPC. However, EPC does publish declared AOS arrangements on its website for information
- EPC may consider the inclusion of AOS arrangements, if supported by a sufficient number of communities, in a future version of the Scheme.

e) The suggestion for change **cannot be part** of the existing Scheme

- It is technically impossible or
- It is not feasible (explained on a case by case basis) or
- It is out of scope of EPC

f) The suggestion for change may be considered for the development of a **new scheme**

- It contains major changes which cannot be integrated in an existing scheme
- To develop these suggestions further would need:
 - a top down analysis of the benefits for customers
 - an analysis of the additional costs involved
 - the confirmation of a level of support by market players in the development phase
 - sufficient engagement by market players to use such a scheme



2.2 Overview of requests received

EPC128-10 Ref.	Topic	Contributor	Result
5.2	New rejection/return code (EPC480-09-16)	French banking community	Accepted - b
5.3	Extended remittance information (EPC480-09-12)	BBVA Spain	AOS – d
5.4	Guidance on validation of mandates (EPC480-09-29)	Febelfin	Accepted – b
5.5	MRI before first collection (EPC480-09-18)	Febelfin	Accepted - b

2.3 Innovative Changes to Technical Operations in Chapters 3 and 4 of the Rulebook

EPC128-10 Ref.	Topic	Proposal and alternatives	Voting results
5.2	New rejection/return code	Accepted - a	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.3	Extended remittance information	AOS - d	Yes
		Do you agree with this proposal?	Yes/No
		If no, which of the following options would you prefer:	
		b) The suggestion should become part of the Scheme	
		e) Reject	
Further comments:			



Ref.	Topic	Proposal and alternatives	Voting results
5.4	Guidance on validation of mandates	Accepted - b	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

2.4 Minor Changes and Major Change of an uncontroversial nature

Section of the Rulebook	Description of the Change	Reason for change	Comments
0.5.1	Text modification to make clear that the SEPA Data Model is no longer maintained as a stand-alone document.	Update	OK
4.6.1	Text in PT-01.02 (relating to signing a Mandate electronically) needs updating. The EPC LSG suggest this is referred to the SPS WG to determine an appropriate process step description for e-Mandates.	Update	OK
4.6.4	PT-04-08 to be adapted to wording of PT-04-04	Clarification requested (EPC480-09-01) Swiss banks	OK
4.7.9	In DS-08 delete "(for the B2B Scheme, the value "paper" always applies)" from the reference to Attribute 17 and replace with "(paper, e-Mandate)". Change is needed to reflect the fact that a Mandate may not always be in paper form as it may be an e-Mandate.	Update	OK

Section of the Rulebook	Description of the Change	Reason for change	Comments
4.7.11	In DS-10 delete "(for the B2B Scheme, the value "paper" always applies)" from the reference to Attribute 17 and replace with "(paper, e-Mandate)". Change is needed to reflect the fact that a Mandate may not always be in paper form as it may be an e-Mandate.	Update	OK
5.4	Amend typographical error in eligibility criteria by deleting second and third bullet points and replacing with single bullet to read "be either incorporated and licensed in a SEPA country or territory, or licensed by an appropriate EEA regulatory body	Correct typographical error	OK
5.4	Amend first eligibility criteria to delete defined term "Customer" and replace with "customer". "Customer" is defined as a non-bank Originator or Beneficiary. This would preclude from eligibility payment services providers which wholly or primarily provided services only to banks. This exclusion was not intended when the Rulebook was drafted.	Correction of typographical error in eligibility criteria.	OK
5.11	In section 5.11, reduce the notice period for termination by a Participant to three months. Also amend erroneous references to suspension of Participant status and clarify sections of the Rulebook which survive termination.	For clarification and amendment.	OK