



EPC138-10  
Version 1.0  
20 May 2010  
EPC

## Latvia's

### Comments on Change Request for the SEPA Core Direct Debit Scheme

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

<b>Name of contributor:</b>	Association of Latvian Commercial banks with support of Latvia's National SEPA Working Group
<b>Organisation:</b>	Latvijas Banka on behalf of Latvia's National SEPA Working Group (NSWG), which represents all SEPA stakeholders in Latvia – consumers, companies, banks, public authorities, payment processing providers and payment technologies providers
<b>Address:</b>	K. Valdemara iela 2A, LV-1050, Riga, Latvia
<b>Contact details:</b>	Phone: (+371) 6702 2439 Fax: (+371) 6702 2179
<b>Your reference:</b>	001.4.5.-08/2010/17
<b>Scheme:</b>	SEPA Core Direct Debit Scheme. EPC016-06 version 5.0 (effective November 2011)
<b>Date:</b>	16 August 2010
<b>Deadline:</b>	19 August 2010
<b>For information:</b>	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: <a href="http://www.europeanpaymentscouncil.eu/knowledge_bank_detail.cfm?documents_id=155">http://www.europeanpaymentscouncil.eu/knowledge_bank_detail.cfm?documents_id=155</a>



## 1 GENERAL

The suggestions for changes received for the SEPA Core SDD Scheme due to take effect in November 2011 have been evaluated and the resulting recommendations are included in the attached document: EPC130-10.

Inputs from consumer organisations are not included as they are being in separate discussions with the BEUC.

## 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

<b>Ref.</b> EPC137-10	<b>Topic</b>	<b>Contributor</b>	<b>Result</b>
5.2	New rejection/return code (EPC480-09-16)	French banking community	Accepted - b
5.3	No refund under certain conditions (EPC480-09-03)	Skagenfund	Not feasible - e
5.4	Rejects of collections (EPC480-09-01)	Swiss banking community	Not feasible - e
5.5	Extended remittance information (EPC480-09-12)	BBVA Spain	AOS - d
5.6	No new mandate after amendment (EPC48-09-13)	Canal + (France)	Already possible - a
5.7	Contesting an amount or a mandate (EPC480-09-14)	Canal + (France)	Already possible - a
5.8	MRI before first collection (EPC480-09-18)	Febelfin	Accepted - b
5.9	Guidance on rejects (EPC480-09-30)	Febelfin	Already possible - a
5.10	Guidance on validation of mandates (EPC480-09-29)	Febelfin	Accepted - b

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

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.2	New reject/return code	Accepted – b	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.3	No refund under certain conditions	Not feasible - e	Yes
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.4	Rejects of collections	Not feasible – e	Yes
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.5	Extended remittance information	AOS - d	Yes
		Do you agree with this proposal?	Yes/No
		If not, which of the following options would you prefer?	
		b) Include in the Rulebook as an option	
		e) reject	
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.6	No new mandate after amendment	Already possible - a	–
Further comments:			



<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.7	Contesting an amount or a mandate	Already possible - a	–
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>
5.8	MRI before first collection	Accepted.
		Since the decision has already been taken to include the option in the scheme, no vote is invited on this topic

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.9	Guidance on rejects	Already provided for - a	–
Further comments:			

<b>Ref.</b>	<b>Topic</b>	<b>Proposal and alternatives</b>	<b>Voting results</b>
5.10	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
4.3.4	Paragraph 8 to be split in order to clarify.	Clarification	OK
	<p><b>Propose to change from:</b></p> <p>The latest day for the Settlement of a Refund transaction is two Inter-Bank Business Days after the date on which the deadlines specified in paragraphs (6) and (7) above come to an end. Rules as to any claims between the Creditor and the Creditor Bank in respect of the Refund payments under the Rulebook are outside the scope of the Scheme.</p>		
	<p><b>Propose to change to two paragraphs to differentiate between authorised and unauthorised transactions:</b></p> <ul style="list-style-type: none"> <li>The latest day for the Settlement of a Refund <u>for authorised</u> transaction is two Inter-Bank Business Days after the date on which the deadlines specified in paragraph (6) above come to an end. Rules as to any claims between the Creditor and the Creditor Bank in respect of the Refund payments under the Rulebook are outside the scope of the Scheme.</li> </ul> <hr/> <ul style="list-style-type: none"> <li><i>The latest day for the Settlement of a Refund for Unauthorised transaction is at the latest 30 calendar days + two Inter-bank Business Days after the date on which the deadlines specified in paragraph (7) above come to an end. Rules as to any claims between the Creditor and the Creditor Bank in respect of the Refund payments under the Rulebook are outside the scope of the Scheme.</i></li> </ul>		
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

Section of the Rulebook	Description of the Change	Reason for change	Comments
4.6.4	Text in PT-04.08 should be identical to that in PT-04.04 and 06.	Clarification	OK
4.6.4	In PT-04-21 delete final sentence: "The procedure to be used in case of an electronically issued/signed Mandate will be included later." This procedure is addressed in the c-Mandate Annex.	Update.	OK
4.7.9	In DS-08 delete "(for the Core 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
4.7.11	In DS-10 delete "(for the Core 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
5.4	Amend typographical error in second bullet point of eligibility criteria to read "be either incorporated and licensed in a SEPA country or territory, or licensed by an appropriate EEA regulatory body"	Correction of 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.	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