

Draft Specification & Bulletin Industry Feedback Form

CONFIDENTIAL

Company Name:

Primary Contact Name:

Working Group or Task Force: 3D Secure Working group

Document: EMV 3-D Secure Protocol and Core Functions Specification, June 2018 Version 2.2.0 Draft 1

Date: September 2018

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Dual/BA/TA/Sub ¹	Clause No./ Subclause No. /Annex)	Paragraph/ Figure/Table/Note	Type of comment ²	Comment (justification for change)	Proposed change	Status (Accept, Reject, In progress)	EMVCo observations on each comment submitted
TA			ge	1) De-coupled authentication a-g	a) Since the first time it was brought up in Copenhagen, we fail realizing why would it be a completely different and isolated flow than the OOB ones (same comments were made by others in the room and to our opinion – left un-answered).	Reject	See comment to d.
					b) Especially given the new “Cardholder Information Text” new data element which would logically be the same as a naïve challenge screen in an OOB flow. That naïve screen would include the “Cardholder Information Text” which would state something at the spirit of: “Dear cardholder, you are expected to receive a push notification to your mobile banking app through which authentication should be completed, please follow the instructions there” (the text should of course reflect the specific chosen OOB method, this example assumes the utilization of a mobile banking app)	Reject	See comment to d.

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					c) As we see it, de-coupled is an incremental addition of the OOB – that practically allows the step-up challenge (if needed, the spirit of the protocol suggests that even when the 3DS Requestor asks for a de-coupled, the best would be to provide the frictionless experience were possible) to take place asynchronously to the transaction itself – as opposed to a “standard” challenge flow that should be completed during the transaction.	Reject	As mentioned, even when the 3DS Requestor asks for a decoupled transaction, the ACS can still respond with a Frictionless experience.

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					d) In order to keep things simple, and avoid un-needed flows that make it difficult to understand, consume and for more parties to “join the party”, we think that you should consider either obsoleting the OOB and suggest that it is practically a de-coupled flow but with the timeouts (3DS Requestor Decoupled Max time etc.) set to just a few minutes (as opposed to 24 hours or a week which were mentioned as examples) or expanding the OOB one to support asynchronous authentication. Keeping them both seems like an overhead that leads to confusion – as was seen in the room.	Reject	The 3DS protocol has been designed to be flexible to support different use cases and authentication requirements. The OOB flow and the decoupled flow are examples of this and both have unique characteristics that address different requirements. For example, an OOB flow cannot support MOTO transactions due to the need to display an instruction page on the consumer device that originated the transaction. A decoupled authentication cannot be integrated into merchant's checkout process like the OOB flow can.

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					e) We do understand that the OOB flow does offer the CReq/Res loops that allows more interaction and dynamics directly between the issuer and the card holder and yet – when OOB (which is practically decoupled, the authentication itself happens on a different and parallel channel) this comes down to a basic instruction at the spirit mentioned above. The new “Cardholder Information Text” is a light weight version of those CReq/Res loops, maybe even a better one but they serve the same logical need at the end of the day which is about having the card holder authenticate directly with his issuer, outside (at the same or at a deferred timestamp) of the e-Comm transaction channel.	reject	While OOB and decoupled have some commonality (they are both authentication methods), they are differentiated to a much greater extent than the comment recognizes. An OOB transaction is not occurring outside or deferred to the e-Comm channel as the cardholder has to return to the merchant’s checkout page to complete the checkout process.

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TA					f) Looking forward to the IoT environment, there are many devices and use cases (like our fridge buying stock on our behalf, that's already a reality) where either the device won't be able to support complex step-up flows or the cardholder won't be in front of the device (the fridge example) and therefore – even if the device could support such an interaction – it would be irrelevant. As such, OOB or de-coupled, which for us are practically the same – should be encouraged. Probably to the fridge example (and there are probably more to come in that nature as the industry evolves) the de-coupled flow is a better fit because the cardholder might be busy the minute the fridge is ordering some additional milk. So, while the concept of de-coupled in terms of not binding the authentication itself to the timestamp where the transaction happens makes a lot of sense – we believe you should focus on either expanding the OOB	Reject	As mentioned both the OOB and decoupled flows serve different purposes. While decoupled might be useful for IoT authentication, it is not useful for the e-Commerce purchase of digital goods, where OOB can be utilised

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					flows to support it or sunset the OOB ones and focus on decoupled		
					g. Trying to be pragmatic, maybe the best technical way of implementing this is by allowing the 3DS Requestor (using the same or very similar attributes to those offered) to suggest already at the Areq step that if a challenge is required - it shouldn't go via the app/site during the transaction but as a de-coupled – using a parallel out of band channel. That's practically what de-coupled do, eliminating the CReq/Res flows but still – implementing their logic and means elsewhere. This also goes in line with the IoT concept where many devices simply wouldn't support anything in-app, as events and purchases won't be driven by just human acts.	Reject	Again, the suggested approach does not recognize that the decoupled approach is not appropriate for all 3DS Requestor use cases. The same can be said for the OOB flow

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TA				2) MOTO transactions	Just putting in writing the verbal comment made, the concept currently misses an equivalent to the SDK data elements (app environment) or the 3DS method (Browser environment) output and many other environment attributes which are built into the protocol which are a MUST in terms of profiling the cardholder.	In progress	The inability to obtain device information during a MOTO transaction is recognized. Do you have any suggestions on how this data can be obtained?
					b. That's also somewhat the case for 3RI Payments only that for 3RI payments, at least by the examples mentioned – it is usually at the context and/or follow-up to a previous transaction at which the card holder was present. Correlating the current 3RI driven payment with the previous "original" transaction is doable to an extent.		Yes, one 3RI use case is that the transaction refers to a prior transaction that would have had device information associated with it

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TA				3) PSD2 whitelisting a-g	a. Technically and as the spirit around the room was at the end of the day, any merchant driven communication/interaction with the cardholder could only cause for confusion. As you and others stated, at the end of the day it is an issuer's call. Even the backend attributes announcing whether the ACS supports it, allowing the merchant to request it etc. seems redundant to us. Yes, in theory we can invent several use cases where it might be needed but in reality – which merchant wouldn't want to be included in a whitelisting mechanism? This request mechanism is practically about requesting the obvious. The same is true from an issuer stand point. Which issuer would want to make it difficult on his consumers? If an issuer/ACS can support whitelisting and is comfortable with it (as the issuer owns the risk) why wouldn't he do it?	In progress	The 3DS WG is making a number of updates to the whitelisting process described in San Diego. A new draft will be shortly shared with TA for review and comment.

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TA					b. It is the interest of all parties to support whitelisting where possible and adding a mechanism that allows communicating and requesting the obvious, seems redundant, especially given the fact in real-time decisions could change no matter what the "official" stand was with regards to whether the PReq/Res statement was nor the specific "hope" by the 3DS requestor.	In progress	See prior comment

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TA					c. Conceptually and with all respect, it seems like EMVCo is trying to contain a legal requirement that goes way beyond the cards space. The SCA RTS does not even mention 3DS and practically it applies to all digital channels (not just the card ones). Its clear EMVCo is making an effort to strength the cards positioning at the market by allowing options but specifically to this case – it is likely to add confusion to the consumers (which use other payment methods besides cards). As mentioned during the discussion, as a consumer my expectation when I am whitelisting a beneficiary (the language of the regulator does not call out merchant, here as well – it goes way beyond the e-commerce space) is that it would apply to me as a consumer across the board and not just at the context of the specific payment vehicle I am currently using.	In progress	EMVCo has developed EMV3DS in a collaborative fashion to address market needs. The protocol is an open specification and not an implementation. Implementers will have a large role in ensuring 3DS is implemented in appropriate environments and properly educating consumers
TA					d. Our take is that these options might create expectations that cannot be really met, potentially driving for confusion and negative user experience.	Accept	Assuming the 'options' being referenced are related to whitelisting, as mentioned, the 3DS WG will be issuing an updated version for TA review and comment

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TA					e. We do acknowledge the need for that but believe it should be managed at the front end between the issuer and his consumers and then – at the backend in between the issuer and his ACS (which caters only for the relevant card subset of the entire scope). Containing it within the 3DS protocol that given the fact it only covers the cards space is about a partial solution which won't address the entire need.	Reject	While in some circumstances, the 3DS protocol's support for whitelisting might be considered a 'partial solution', that doesn't mean that there is no value in 3DS providing support for whitelisting. 3DS's whitelisting support is available for those endpoints that have concluded it is beneficial to utilize. We recognize that endpoints can decide to implement whitelisting outside the protocol.
TA					f. There were also comments made about international aspects and merchants, Cardholders etc. living outside of the EU to which this is irrelevant. You rightfully called out that's the technology and it can be used or not subject to the specifics of each transaction.	Accept	Agreed

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TA					g. To summarize, we think it adds more confusion than value and does not excuse the various parties from addressing that regulation need on other channels/platforms as well and therefore – redundant. The protocol which by definition is a technology infrastructure trying to cater for specific regulatory need (a need that goes way beyond the protocol boundaries) seems inefficient and confusing. Our recommendation would be to drop it out completely. Up until now and if we can say in a pretty smart way EMVCo avoided interfering with actual decisions taking place at the various endpoints of the protocol – actually facilitating the communication and data exchange in between those ends points helping them taking smarter and more educated decisions but leaving those decisions at the hands of the end points. We think these new whitelisting features somewhat “violate” that principle and more		Hopefully, the next version of the protocol which updates 3DS's whitelisting support will be received more favourably.

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					importantly – doesn't truly address the challenge.		
TA				4) General	As a guideline, and keeping in mind we are all still in very early stages of 3DS 2.0 market adoption, I think we should allow the market and the various players, we obviously have our own interests here) the time to ramp up and see some real life implementations and use cases – given the pretty wide spectrum covered already by V2.1. Expanding beyond those, on areas that do involve a level of disagreement between various parties might be about committing too soon for challenging expansions. I think on areas of disagreements, you should avoid making a clear cut at this stage and wait for some real life feedback.		Thank you for the comments. We recognize the challenges and impact to the market if the 3DS specifications evolve too quickly. The priorities and timelines for issuing specification versions 2.1 and 2.2 were developed in conjunction with the TA and advisors. Implementation of the specifications is determined by each network.

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TA				5) Testing	Last but not least, partial certification is of an issue. We already know some DS programs (I do avoid calling out specific names so you can share as is with the workgroup if you find it suitable) has already decided their DS programs would only adopt subsets of the entire protocol. Looking into V2.2 we do see some of the features are indeed optional (meaning you could pass EMVCo certifications without implementing those we guess) but still at the context of v2.1, supporting features which don't make sense from a go-to-market option just so one could pass certification – does not seem reasonable nor efficient. What's the status on that one? Giving a very basic and naïve example (which we don't think of taking but it might make sense to other vendors and/or markets) what if a 3DS vendor is only interested offering a basic allow/decline only mode? I.e. a 3DS Server vendor would be using 3DS just for silent authentications and	In progress	From an EMVCo perspective, partial certification is not an option. In the future, the specification could be enhanced such that new features, possibility specific to a given market, could be optional to support. If that was the case, the UL platform would be updated accordingly. It should be noted that DS's also have to pass the full certification process, there is no partial certification.

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					use other channels where frictionless cannot be supported. How can this be implemented? That 3DS Server vendor currently has no choice but get certified all over (and make the required investment) though his real-life implementations won't be utilizing that.		
TA	3.1	Req 29	ed	Field name "3DS Requestor Decoupled Requestor Indicator" is not the same as in table A.1 for threeDSRequestorDecReqInd	Use the correct name "3DS Requestor Decoupled Request Indicator"	Accept	3DS Requestor Decoupled Requestor Indicator
TA	3.3	Req 106	ed	Field name "3DS Requestor Decoupled Requestor Indicator" is not the same as in table A.1 for threeDSRequestorDecReqInd	Use the correct name "3DS Requestor Decoupled Request Indicator"	Accept	3DS Requestor Decoupled Requestor Indicator
TA	3.4	Req 290	ed	Field name "3DS Requestor Decoupled Requestor Indicator" is not the same as in table A.1 for threeDSRequestorDecReqInd	Use the correct name "3DS Requestor Decoupled Request Indicator"	Accept	3DS Requestor Decoupled Requestor Indicator

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TA	3.1	Req 321	ge	"3DS Requestor Decoupled Max Time" is not a field in AReq. It is not even listed in table A.1.	Add the field to AReq in A.1.	Accept	Change made
TA	3.1	Note after Seq 3.38	ge	12 hours to find out that a timer expired is too long. Since the ACS shall start a timer, the ACS can also immediately (or within minutes) know that the timer expired and send an RReq. BTW, the same note exists in 3.3 after Req 326 and in 3.4 after Req 329 and would have to be changed too.	Decrease to e.g. 1 hour.	Accept	The 3DS Working Group has clarified the note within the specification.

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TA	3.1	Seq 3.47, b	ge	In case of the timer expiring, 3DS Server should wait for "3DS Requestor Decoupled Max Time" + 30s. This is enough to receive an RReq in case of non-expiration, but not enough to receive RReq after an expiration (as that could come 12h later) This comes a bit as a surprise and made me first think that it is wrong, until I understood the idea behind it.	Explain that the reason for this is to wait for RReq in case of non-expiration, but not to wait for RReq after an expired timer. With this 3DS Server can immediately expire the transaction.	Accept	3DS Requestor Decoupled Max Time indicates the maximum time the 3DS Requestor will wait to receive the RReq result. The specification added 30 seconds to this time to allow the generation of the RReq from the ACS to the 3DS Server. This data element was not originally included in the first draft of v2.2.0. Decoupled Expiry Time presents the maximum time for a decoupled authentication to complete. An additional 30 seconds is not required as it is assumed the expiration of this time would indicate the ACS was unable to generate the required RReq. Please let the 3DS WG know if these two definitions are clear within the specification and if the

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							addition of 3DS Requestor Decoupled Max Time helps answer the question.
TA	3.1	Notes after Seq 3.47	ge	The second note "the first requirements of Step 24 are applicable only for a Challenge Flow" is confusing and redundant. The note just before for frictionless says the same thing with different words: "the next step is Req 79".	Rename step 25 to 26. Split up step 24 into 24 and 25. Merge both notes to say "Step 10 through Step 24 are applicable only for a Challenge Flow (Transaction Status = C)."	Reject	The WG has decided not to update the steps as such updates have implications to other areas within the specification, including Figures and Process Flows. Although perhaps redundant, unless you believe it is inaccurate, no changes are to be made to this section
TA	3.1	Third note after Seq 3.47	ge	The note regarding JavaScript for redirection is completely wrong here. We are in chapter 3.1, app-based. There is no Javascript for app-based.	Delete note	Accept	Note removed
TA	A.4	Table A.1	ge	Does it make sense to have "transStatus=D" in an RReq, i.e. after the decoupled authentication happened or expired? I don't think so.	Add remark to Description saying that "D" is only allowed in ARes.	Accept	Condition to be mentioned under Transaction Status data element

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TA	3.3	Req 107	ge	Regarding transaction status "I", how is the ACS supposed to determine that the transaction is "authentication not requested by 3DS Server"?	Write which field in AReq can be used to determine this.	Reject	3DS Requestor Challenge Indicator in the AReq will communicate to the ACS that authentication is not being requested (value 05 and 06)

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TA	3.3	Req 107	ge	It is quite unclear when transaction status "I" should be used. It will definitely not start a decoupled authentication, because Req 327 says to only do that for transaction status "D". One case seems to be when AReq.threeDSRequestorChallengeInd is set to 06, in which case no challenge is done and "I" is returned immediately. Another case seems to be when a challenge is requested, so that also an authentication value can be returned in RReq. Also it is unclear whether "I" can be used in ARes only or also in RReq. From the above it seems that it only makes sense in ARes.	Clarify in the specification	Accept	Condition to be mentioned under Transaction Status data element

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TA	3.3	Note after Req 92	ge	The first part of the note regarding protocol versions is in a wrong place. It should at least be before step 4, so that 3DS Method is not initiated. I see that a similar note for app-based exists after Req 14, this one is also in a wrong place, but chapter 3.1 is completely missing anything about PReq, that's why that note can't come earlier.	Move this part of the note to Req 80.	Reject	This note will remain in its current location as it is describing how the 3DS Server would utilize the PRes data it received prior to generating the AReq message.

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TA	A.4	Table A.1	ge	For "whiteListStatus", what is the proper answer if "threeDsRequestorWLRequest=D", and the cardholder accepted to delete the requestor from the whitelist? Would it be "N"? And what if "threeDsRequestorWLRequest=A", and the cardholder rejected to add the requestor to the whitelist? Would it be "D"? That means Y/N are only used if the cardholder accepted, D is used when the cardholder rejected (either adding or deleting). Correct?	Describe the use of the values better.	Accept	Thanks for your comment. The WG has removed the add and delete functions from the AReq within the new draft version of 2.2.0. If the merchant believes it is not on the cardholder's whitelist, the 3DSS can set the whiteListStatus = N within the AReq. If the merchant believes it is on the cardholder's whitelist, the 3DSS can set the whiteListStatus = Y within the AReq. If the cardholder chooses to not to participate in whitelisting via that transaction, the ACS can indicate such within the whiteList Status (RReq) by setting the indicator to R = Reject (same as old "D").

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TA	A.4	Table A.1	ge	For "whiteListStatus", what is the meaning of it in AReq? What does the requestor want to tell to the ACS if he sets the value to "Y"? I don't think having this field in AReq makes sense.	Remove from AReq.	Reject	Some regions may opt to have the merchants manage the whitelist and offering this indicator on the AReq allows such flexibility.

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TA	A.4	Table A.1	Ge	For “threeDSRequestorWLRequest”, why is it needed at all? Our ACS could always show the cardholder the option to whitelist the requestor, without the requestor telling us. There is no extra value in this field. Should we prevent the cardholder from adding a requestor to the whitelist if we receive “D” all the time?	Remove threeDSRequestorWLRequest.	Accept	This data element has been deleted in the new draft version of the 2.2.0 specification. However, the 3DSWG did add new indicators within the 3DS Requestor Challenge Indicator to enable the merchant to request whether 1) Challenge is requested due to wanting the ACS to add the merchant to the cardholder whitelist or 2) Challenge is not requested as the merchant would like to utilize the Issuer's whitelisting exemption as they believe they have already been added to the cardholder's whitelist. These indicators are similar to the other indicators within this data element as it allows the merchant to communicate to the ACS / Issuer whether challenge is requested or not.

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							Agree it is still up to the ACS / Issuer to take whatever action they believe is correct or necessary for the transaction.
TA	1		ge	In chapters 1, 1.5, 2.6.3 and 4.4, "decoupled authentication" is only listed for 3RI. From that I would assume that decoupled authentication is only possible for 3RI. But why are then all fields related to decoupled authentication also available for APP and BRW? And chapters 3.1 and 3.3 explain for APP and BRW how decoupled authentication is handled.	Properly define whether decoupled authentication is 3RI-only or an authentication method that can be used for all APP, BRW and 3RI.	Reject	Decoupled is mentioned in Section 3.1 and 3.3.

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TA	A.4	Table A.1	ge	“threeDSRequestorDecReqInd” is used by the requestor to select an authentication method. Why does the authentication method “decoupled” have its own field? What about all the other current or future authentication methods? Wouldn’t it make sense that the requestor can say which ones he would like?	Rename to threeDSRequestorReqAuthMethodInd, which is an enum with currently only one value “decoupled”. Or to a list of enums.	Reject	Decoupled authentication is the only authentication method, currently, that requires confirmation from both merchant and ACS to support. Therefore, a unique identifier is needed in the AReq to confirm to the ACS this is the preferred authentication method.
TA	A.4	Table A.1	ge	“authenticationValue” for transStatus=I can not only be based on DS rules. If threeDSRequestorChallengeInd=06 then I would assume that an authenticationValue can not be set if the ACS can’t authenticate the cardholder frictionless.	Describe better when the value is set for transStatus=I	Reject	This condition is similar to other conditions between Transaction Status and Authentication Value (for example, NPA)
TA	A.4	Table A.1	Ge	For “threeDSRequestorChallengeInd”, value 06 was added for “data share”. It is quite unclear what this data sharing is, whether it can work together with a challenge or without.	Please describe this feature in more detail.	Accept	3DSWG will look to add more clarification to the description of this Transaction Status within the specification

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Dual	A.7.4		TE	Travel agencies and non-travel marketplaces have a payment situation where a customer is charged multiple times for a single purchase. This situation occurs when multiple items are purchased from different merchants. The items will be charged by different merchants through their own respective PSPs. For a better customer experience, it would be beneficial to perform one 3DS Authentication at the Requestor App and perform N (where value of N is unknown) charges. These charges would be smaller increments than and not exceed the original amount in total. Example: customer does a 3DS Authentication for \$200. Travel agent makes a charge for \$100 and the customer card information is sent to another two merchants which perform charges of \$75 and \$25 each.	The fields for 3DS Request Prior Transaction Authentication Information hint that a link can be established between multiple 3DS Authentications. Please describe what is the value of providing a prior 3DS Authentication Information and include the impact / result of providing those values. After reading the values of threeRIInd in the AReq message, it seems there may be a relationship between threeRIInd=06 (split shipment) and providing the prior transaction information. If we set the 3DS Request Prior Transaction Authentication fields and threeRIInd=06, can we use a single 3DS Authentication of the total amount and generate several "split" 3DS Authentication values? Example:	Reject	Implementation is defined by each program rules. (No spec impact)

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				Note that merchants may not know the number of follow up charges. In this situation, how can a single 3DS flow be used for N charges or new tokens be used using the initial token as a reference?	Browser challenge flow for 3DS Authentication of \$200 results in CAVV value of 1 (the original CAVV). A new AReq is made for \$100 using the original CAVV as the prior Authentication result. This results in a CAVV value of 2 (a split CAVV). Potentially (for N times) another new AReq is made for smaller amounts and again using the original CAVV as the prior Authentication result. This results in a CAVV value of 3+ split CAVV, 3RI flag is always set to 06. In this example would the 3RI calls to request split tokens for decoupled Authentication since the original transaction was authenticated with the customer?		

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Dual	-	-	TE	Fields for dynamic linking are currently undefined for linking authorization and authentication to meet the dynamic linking requirements of PSD2	Can EMVCo define the requirement for dynamic linking and include fields to link them?	Reject	How authentication is linked with authorization is defined by each program. Any other references for dynamic linking have been removed.
Dual	A.1	acquirerMerchantID	TE	What is the expected accuracy of the acquirerMerchantID field? There are situations where a MID is not known during the 3DS Authentication process.	Indicate the expected result of the Authorisation if the merchant ID does not match the value sent in AReq. For split payments, during 3DS Authentication, if threeRInd = 06, can issuing banks ignore the acquirerMerchantID or change this field to Conditional for payments where this value is unknown?	Reject	Checking the accuracy of the acquirerMerchantID is defined by program rules.

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Dual	A.4	threeDS ServerTransID	ED	Every request and response message needs the 3DS ServerTransID. The field Description indicates that the 3DS Server needs to assign this value but the procedure for generating and creating this value is not clear until Seq 3.88. It may lead to confusion about where this value is supposed to come from and how it is supposed to be created.	Clarify what message is responsible for generating or returning this ID. For clarity, consider adding a note to section A.4 and Seq 3.88	Reject	The source of the 3DS Server transaction ID is defined in table A.1. Please clarify why the confusion is occurred?
Dual	3.1	Seq 3.47 b	TE	It is unclear what the timescale is for the 3DS Requestor Decoupled Max Time field. If this field is measured in milliseconds or weeks makes a big technical difference for scale and architecture.	If possible, please add a lower and upper bound to this field, or a default value, to indicate appropriate ranges for this value. Our assumption is that this period will typically be in the range of seconds or minutes but likely no longer than days.	Reject	The specification has clarified the MAX time is in a minute in Table A.1. Upper bound is in the element of decoupled expiry time as one week.

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Dual	A.4	threeRIInd	TE	The Message Inclusion of the threeRIInd is required on the AReq message. It is not clear what value should be provided when the AReq message is used in a NON 3RI flow.	Potentially make the value optional or conditional. The absence of the value indicates that the customer is initiating the transaction and not the 3DS requestor. Another option could be adding a value to explicitly indicate that the 3DS is initiated by a browser or application.	Reject	3RI message is only for device channel = 3RI, not for app or browser transactions.
Dual	5.5.1	ACS	TE	Could not find the timeouts between 3DS Method and AReq. How long can the Merchant wait after 3DS Method is complete and before AReq is performed?	Please include the timeout in this section	Reject	Timeout between 3DS Method and AReq is implementation specific.
Dual	5.5.1	ACS	TE	Could not find the timeout between CRes and Authorization. How long can the merchant wait after CRes is complete and before Authorization can be performed?	Please include the timeout in this section. Travel agencies would need up to 1 year.	Reject	It is program rule specific.

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Dual	5.1.6	5.24	TE	How should threeDSCompInd be validated? What if 3DS method is incomplete but we set threeDSCompInd=Y in AReq? Will ACS honor this value?	Clarify how ACS should validate values in threeDSCompInd field.	Reject	It is not supposed to set threeDSCompInd=Y but ACS may validate the field and take an appropriate action. This is the out of the scope of the protocol specification.
Dual	5.5.2.1	Seq 5.47	TE	"The 3DS Server and ACS shall set appropriate AReq and ARes message timeout values, as set by DS requirements when communicating with each DS separately." Can EMVCo define these timeout values for ACS for AReq?	Please include the timeout in this section.	Reject	DS Program requirements / values are not included within EMV specifications, including the 3DS specification. DS Program requirements are typically documented within their own documentation.

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TA		General		<p>As a general impression, it seems that the proposals for new features in current draft for the EMVCo 3DS v2.2.0 specification (as described in Bull 207 ; e.g. Decoupled Authentication, Whitelisting, 3RI payments, ...) are not sufficiently stable and complete to be correctly reviewed by Technical Associates : Some parts of the descriptions are completely missing (e.g. definitions of mandatory parameters for Decoupled Authentication, opening of 3RI with no authentication in PA, ...), and not enough use cases or examples are provided, which makes it complicated to understand the objectives and modes of operation of these new features.</p> <p>In addition, we want to raise a warning about the fact that the new features seem to be structuring, with significant impacts on EMVCo 3DS implementations, while many actors are still working on the</p>			<p>We appreciate that it may be somewhat difficult to gain an overview of various 3DS functions and features in the specification itself (which by design is intended to just describe the technical functionality).</p> <p>The right material to gain insight to the use-cases is rather the presentations made for the EMVCo associates during the various associate meetings.</p> <p>For the three features mentioned, we can in particular recommend the presentations given at the various TA and ad-hoc meetings through the years:</p> <ul style="list-style-type: none"> - For 3RI, high-level overview can be obtained via the material delivered in 3DS and TA Ad Hoc meetings June 2016 in

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				implementation of the current v2.1.0 from October 2017 (which was presented as stabilized, with no significant updates planned for 2018 when released) and while the Type Approvals for v2.1.0 are still not available.			<p>Copenhagen, September 2016 in Shanghai, and January 2018 in Miami</p> <p>- For Decoupled Authentication, material from March 2017 TA meeting in Madrid and the January 2018 ad-hoc meeting in Miami</p> <p>- Whitelisting is as mentioned a rather new effort, however an overview is available from the 3DS Ad-hoc meeting in June 2018 in San Diego</p> <p>They should all be available for associates from the EMVCo website.</p> <p>We also acknowledge the need for stabilization, thus we have no intention to sunset version 2.1 anytime soon, thus giving the EMVCo stakeholders the flexibility to choose an implementation</p>

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							timeline suitable for their needs. Albeit no requirement to upgrade, we do believe it is important to release these new features because of the PSD2 introduction in Europe in September 2019 for which the features may be beneficial.

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TA		Protocol Spéc.v2.2.0 : Annex 1, Table A.1, 'ACS Decoupled Confirmation Indicator' and '3DS Requestor Decoupled Request Indicator' definitions	Te MAJOR	The definition of the '3DS Requestor Decoupled Request Indicator' field indicates that this field is optional in AReq ("AReq = O") and may take 2 values 'Y' and 'N', and that when absent it shall be interpreted as 'N'. Therefore, value N does not seem necessary and definition is not homogenous with the definition of other fields (such as the EMV Payment Token Indicator). + The definition of the 'ACS Decoupled Confirmation Indicator' field indicates that this field is conditional in ARes ('Ares = C') and is "required if transaction Status = D". With this definition, our understanding is that this parameter is Not Applicable to other EMVCo Messages (e.g. N/A in AReq) and to other Transaction Status. But in this definition it is also indicated that this field may take 2 values = Y or N, and	Proposal: Define the '3DS Requestor Decoupled Request Indicator' field as conditional in AReq (AReq = C) and as "Required if Requests Decoupled Authentication to be utilised". And define a single value accepted = 'Y'. (exactly as for the definition of the 'EMV Payment Token Indicator' field). + Suppress the 'ACS Decoupled Confirmation Indicator' field as it is completely redundant with TS = D. If this proposal is rejected: Both definitions need to be clarified regarding the needs and use cases for 3DS Requestor Decoupled Request Indicator = N and for both values of ACS Decoupled Confirmation Indicator ; also the default value (when absent) and the conditions when ACS Decoupled Confirmation Indicator is optional must be clarified.	Accept	WG will look to further clarify these conditions within the next draft of the specification.

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				that "if Transaction Status = D, a value of N is not valid". This seems to indicate that when TS is different from D, the ACS Decoupled Confirmation Indicator may optionally be sent with value N (or Y?). And probably that when this field is not present, It is the same as when present with value N (but this is not indicated).	+ We want to raise a warning regarding the lack of definition on the presence conditions of the 3DS fields defined in Table A.1 (that CB already notified on previous versions of the spec.) : the EMVCo 3DS specification indicates when a field is required but it (almost) never indicates when a 'not required' field is N/A or optional. For what we understand (in our implementations), when no presence condition is indicated, a field is always considered as N/A and shall be disregarded, but this is never completely clear and it is subject to interpretations.		

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TA		Protocol Spéc.v2.2. 0 : Req 61 and 123	Te MAJOR	<p>[Reqs 30, 107, 291] For the ARes message, the specification explicitly indicates that the 8 possible values Y, C, N, A, U, D, I and R can be used (with clear definitions of when to use them).</p> <p>[Reqs 61, 123] For the RReq message, the specification explicitly indicates that 2 values Y and N can be used (and when), but it does not indicate that other values may be used and when (which seems to indicate that other values do not apply ; and table A.1 is not explicit on the applicable values of this field in the different 3DS messages).</p> <p>But EMVCo has confirmed in Query ID#180162 that TS= A, U or R also applies in RReq, which does not seem to be the case when reading the specification.</p>	<p>Please, add the following definitions in [Reqs 61, 123] :</p> <p>* If the cardholder could not be authenticated after an ARes with TS = C (e.g. authentication cancelled by merchant or cardholder, technical issue preventing the challenge mechanism, ...) and the ACS does not provides an authentication value, sets Transaction Status = U</p> <p>* If the cardholder could not be authenticated after an ARes with TS = C (e.g. authentication cancelled by merchant or cardholder, technical issue preventing the challenge mechanism, ...) but the ACS generates and provides an authentication value, sets Transaction Status = A.</p> <p>+ Please update the definition for the case where an RReq with Transaction Status = N is generated by ACS to indicate that it shall send TS=N if the issuer allow the 3DS</p>	Accept	The 3DSWG agrees further clarification is required within the specification on how Transaction Status indicators are used across the 3DS message types. The 3DSWG will provide these clarifications within the next Draft version of the specification for your review and feedback.

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					Requestor to initiate a payment authorisation and it shall send TS=R (with Transaction Status Reason = 19 ?) if the issuer request that authorisation not be attempted.		

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TA		Protocol Spéc.v2.2.0 : Chapter 3 Req 30, Req 107, & Req 291 + Table 1.3	Te MAJOR	In Reqs 30, 107 et 291 and in Table A.1, EMVCo introduces a new value of the Transaction Status = I. The only descriptions (that we found) regarding this new value are : "authentication not requested by the 3DS Server for data sent for informational purposes only (Transaction Status = I)" And "[Presence of Authentication Value is] Conditional based on DS rules if Transaction Status = I" And "I = Informational Only; 3DS Requestor challenge preference acknowledged." => This seems to introduce a new type of 3DS operations based on the 3DS Server sending an AReq not requesting a challenge (does it means 3DS Requestor Challenge Indicator = 01, 02, 05 or 06 ? or only 06 ?) and providing information on	Please add a new definition for "Informational Only operations" in Table 1.3 'Definitions' (as for the new Decoupled Authentication also introduced in this version). And please clarify this new type of 3DS operations (which is not even listed in introduction of Bulletin N°297) : What is the expected flow(s) for this new type of 3DS operations? What are the potential use case(s)? Does it applies when 3DS Requestor Challenge Indicator = 01, 02, 05 or 06 in AReq ? or only when 3DS Requestor Challenge Indicator = 06 ? What could be the goal of sending an AV when TS = I? Is a DS allowed not to support this new types of 3DS operations (i.e. TS = I not implemented) ?	Accept	A new definition has been added for Information Only within Table 1.3. This definition will be added to our Bulletin 207. This new Transaction Status = I was intended to be used in regulated markets whereas the merchant is required to send authentication data to the Issuer to help enhance the Issuer's RBA model, but authentication is not being requested. Other potential use cases could be defined by each DS Operator Program Rules. This Transaction Status = I would only apply when 3DS Requestor Challenge Indicator = 05 or 06; the 3DS WG is looking to define this condition within the specification. The goal of the AV when Transaction Status = I is to pass

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				the cardholder and concerned transaction to the ACS, to which the ACS responds with an Ares with no information about the cardholder authentication (TS=I), and with or without an AV depending on the DS rules.	Or at least to request the ACS not to support this types of operations? <i>And please allow more comments on the specification once this type of transactions is clarified.</i>		that AV in the authorization of the transaction so the Issuer has proof that authentication data was sent prior to the authorization. In regulated markets, there are concerns on the approval rates of transactions that do not contain the AV The DS must support the Transaction Status = I as per the specification requirements and DS test cases; however, the DS does not need to support the inclusion of the AV. The ACS is not required to respond with a Transaction Status = I. The ACS will always have the final decision as to how to respond to the authentication request (Y, N, C, etc.). But Transaction Status = I will be a new option.

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TA		Protocol Spéc.v2.2. 0 : Table 1.3 + Reqs 321, 322, 325, 326, 329, 330 + Table A.1 + Table B.1	Ed/Te MAJOR	In the 3RI definition (Table 1.3), the Decoupled Expiry Time is introduced: "Represents the maximum time for a Decoupled Authentication to complete (value is set to 1 week)." In the Reqs 321, 325, 329 the 3DS Requestor Decoupled Max Time is introduced : "the ACS determines whether an acceptable challenge method is supported by the ACS based in part on the following data element received in the AReq message" And Reqs 322,326, 330 mention the 2 timings : the Decoupled Expiry Time and the 3DS Requestor Decoupled Max Time. But none of these timings is described (not even listed) in tables A.1 and B.1 (and therefore are no considered as part of the 3DS Messages)	Please provide : In Table 1.3 = suppress the description of Decoupled Expiry Time which should be described in Table A.1 rather than 1.3 = it shall probably be described within the description of the 3DS Requestor Decoupled Max Time as the maximum value of this Data Element (and it does not even need to be a field with a given name for what we understand, as it is a fixed maximum value not exchanged by the 3DS components). In Table A.1 = description of the format, value, presence condition in the messages, for 3DS Requestor Decoupled Max Time (+ maybe the Decoupled Expiry Time if needed, see above). <i>And please allow more review / comments by Tech. Associates on the specification once the descriptions of these data elements will be provided as the lack of descriptions</i>	Accept	3DS Requestor Decoupled Max Time has been added to Table A.1 as it will be part of the 3DS Messages. Decoupled Expiry Time is not part of the 3DS messages and therefore would not be added to Table A.1. The Decoupled Expiry Time is a set value that allows all 3DS components to close out the decoupled authentication transaction. The 3DS Requestor can end processing once the 3DS Requestor Decoupled Max Time expires.

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					<i>here makes the review of the Decouple Authentication proposal complicated.</i>		
TA		Protocol Spéc.v2.2.0 : Table 1.3 Definitions (3RI definition)	Ed MAJOR	In the 3RI definition, the following has been added : “[...] The second main use case is when the 3DS Requestor requests Decoupled Authentication as a method to authenticate the Cardholder.” -> This seems to indicate that Decoupled Authentication is a 3RI use case and therefore is allowed only in DC=3RI (which is not correct as far as we understand).	Proposal : Replace by “[...] The second main use case is when the 3DS Requestor wants to authenticate the Cardholder while this one is not present, in this case Decoupled Authentication is used.”	Accept	The 3DSWG has clarified within the definition of Decoupled Authentication that all Device Channels are supported.

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TA		Protocol Spéc.v2.2.0 : Chapter 3 Req 322, 326 and 330	Ed Minor	In section '3.4 3RI Based', Requirement Req. 330 contains 3 bullets providing 'generic' precisions regarding how the ACS authenticates the Cardholder : "The ACS authenticates the Cardholder directly or through an Authentication Service (a service provider/Issuer interacting with the ACS). The ACS initiates the interaction with the Cardholder and the Cardholder authenticates to the ACS. • The method used by the Authentication Service is outside the scope of this specification. An example of an Authentication Service method could be a push notification to a banking app that completes authentication and then sends the results to the ACS. • How an authentication decision is made is outside the scope of this specification, however the ACS objective is to complete	Proposal : report the 3 precision bullets from Req 330 to Req 322 and Req 326.	Accept	Decoupled authentication definition has been updated to reiterate that this authentication method is supported across all channels (Browser, App, 3RI). WG will also move the three bullets further up within the documentation to better communicate it applies to all three channels and not just 3RI.

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				the Cardholder authentication before the 3DS Requestor Decoupled Max Time expires." These precisions seem to apply also to App and Browser Based authentications (not only 3RI) but they are not in Req 322 and 326.			

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TA		Protocol Spéc.v2.2.0 : Chapter 3 Reqs291 and 292	Te MAJOR	In section '3.4 3RI Based', requirement Req 292 now indicates that Message Category = 01-PA is now supported for the Device Channel = 3RI, with no identified restrictions in the new version of the spec. (while 3RI was allowed in MC = 02-NPA only in spec. v2.1.0). Our understanding is that when Decoupled Authentication was not available, there was no need to use 3RI for a Payment Authentication (as the verification of account information for a subscription was performed in NPA). And it seems that the use of 3RI for a Payment Authentication should be possible only in case of a Decoupled Authentication.	Proposal : Clearly indicate that for DC = 3RI and MC = PA, only TS=D (or N or R in case of rejection) is allowed in Ares (maybe value 'I' too?). Else, please clarify what is the use cases (at least one example) for DC = 3RI and MC = PA and TS = Y or A?	Reject	3RI payment does not necessarily require the decoupled authentication method as the ACS has the option to apply RBA and perform a frictionless authentication (Transaction Status = Y within ARes). This use case would most likely apply to recurring payments whereas strong consumer authentication was performed on the initial transaction and was referenced on the subsequent transactions.

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TA		Protocol Spéc.v2.2.0 : Chapter 3 Req 29, Req 106, & Req 290	Ed minor	The 3 requirements Req 29, Req 106, & Req 290 have been updated to indicate that the ACS <u>should</u> use the values of the the 3DS Requestor Authentication Indicator and the 3DS Requestor Decoupled Requestor Indicator, in addition to the 3DS Requestor Challenge Indicator, received in the AReq message when evaluating the transaction disposition (in v2.1.0 only was recommended to be used).	<u>We propose to delete these “requirements” as they are not clear, they are only recommendations and they do not seem necessary as the “real” requirements Regs 30, 107 and 290 already cover all Data Elements received in AReq.</u> If not deleted, could EMVCo please provide clarification on this recommendation : Why are these 3 parameters particularly recommended to be used by the ACS when evaluating a transaction? Does it mean that the ACS should not use (or rely less strongly on) other data elements from AReq ? And (as already requested on previous versions), <u>could EMVCo clarify what does “use the values of [these parameters] when evaluating the transaction disposition” means?</u> How should they be used? To generate what “disposition”?	Reject	The ACS will look at all data elements / values received within the AReq message when evaluating the transaction disposition. These three values were included to help highlight which data elements / values may be of importance to the ACS during that evaluation.

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2 **Type of comment:** **ge** = general **te** = technical **ed** = editorial – For technical comments, please indicate whether your comment is a MAJOR or MINOR technical comment.

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Document: EMV 3-D Secure Protocol and Core Functions Specification, June 2018 Version 2.2.0 Draft 1

Date: September 2018

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TA		Protocol Spéc.v2.2.0 : Sections 2.4.7 and 2.4.8	Ed minor	It seems that because of an editorial error (wrong word used) in 4.2.7 and because the sentence is now getting long, these sections are complicated to understand.	Proposal to replace the beginning of both sections by : “[...] information about : - the Protocol Version Number(s) supported by available ACSs and the DS, - whether the ACS supports Decoupled Authentication and/or Whitelisting if one exists, any corresponding 3DS Method URL.”	Accept	Changes made to Sections 2.4.7 and 2.4.8 per your feedback.
TA		Protocol Spéc.v2.2.0 : Table A.1	Ed minor	In Table A.1, the Condition Inclusion (last column) of Transaction Status now indicates : “For 01-PA, the CRes, only present in the final CRes message.”	To be replaced by : “For 01-PA, only present in the final CRes message.”	Accept	Update to be made

NOTE: EMVCo welcome further feedback on observations/responses provided via the query system on <https://www.emvco.com/submit-a-query/>

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