

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, Version 2.2.0 Draft 2

Date: September 2018

						EMVCo Use Only	
Dual/BA/T A/Sub ¹	Clause No./ Subclause No. /Annex)	Paragraph/ Figure/Tabl e/Note	Type of com- ment ²	Comment (justification for change)	Proposed change	Status (Accept, Reject, In progress)	EMVCo observations on each comment submitted
TA	5.89	EMVCo_3 DS_Spec_ 210_1017 _0318 Req 269		This architecture assumes a server generated site. For single page applications, there's no place for the POST to go. The ACS is making a post to an API that is only supposed to provision a specific domain.	Have the ACS support an option to instead submit a window. Post Message from the iframe hosting the ACS HTML to the hosting app. The 3DS Requestor then passes the CRes to its commerce APIs	In Progress	3DSWG will be exploring other methods for challenge and data collection in a future version of the specification.
TA	5.89	EMVCo_3 DS_Spec_ 210_1017 _0318 Req 269		The HTML/JavaScript being shown by the ACS needs a very clear specification so that all custom browsers that merchants support can be tested against	The ACS Challenge needs to be very specific and documented in the 3DS specification so that merchants can make sure that they support all use cases from the issuers	In Progress	The User Interface is standardized within the pre-defined templates. Issuers and ACSs are expected to follow those templates. The specification does not have requirements as to which browser or browser version are supported. Such testing is out of scope for EMVCo at this time. However, the 3DSWG will examine additional browser requirements in a future version of the specification to help support user experience via different browsers and versions.

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TA	2.7 Part two	EMVCo_3 DS_SDKDeviceInfo_210_1017_0318		Custom devices may have a desire to send their device information. Some Device information may be incredibly useful for a risk profile of those devices.	Have a format to support some amount of custom parameters. These can be configured per merchant.	In Progress	The 3DSWG is examining other methods to pass device information from the merchant / 3DS Server to the ACS for risk based decisioning. The 3DSWG is also examining additional parameters that are not defined within the EMV 3DS SDK Device Information
TA		EMVCo_3 DS_SdkSpec, EMVCo_3 DS_SdkSpec_210_1017_0318		Allow for a generic device	Change the `2.6 iOS-Specific Device Parameters` to support a generic device (remove font size and font family). The rest of the SDK spec is device agnostic - in this way, as long as a device was certified, a native experience could be developed for it.	In Progress	The effort to examine generic devices is already in progress with the 3DSWG.

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TA	A.4EMV 3-D Secure Data Elements	Acquirer Merchant ID Field Name: acquirerMerchantID		This assumes we know the Acquirer and BIN prior to the 3DS2.0 request. As a multi-acquired merchant with complex backend retry logic this presents a very difficult challenge as we do not know which acquirer will ultimately handle the final authorization request.	The merchant should not be required to send this information (nullable field) as it will present a situation where the data in this field is not accurate. This will be a difficult challenge for big multi-acquired merchant with retry logic. - Send 3DS Requestor ID that identifies a merchant and not an acquirer account	Reject	The v1.0.2 3DS protocol has the same issue whereas the authentication Acquirer may not be the same as the authorization acquirer. Some Payment Systems may request this field to match within the EMV 3DS protocol, but it is not a requirement within the specification. Acquirer BIN and Acquirer Merchant ID will remain mandatory (for Payment Transactions) as many DS Operators have formal relationships with the Acquirer. The Acquirer Merchant ID will likely be assigned during the time of the enrollment with the DS Operator.

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TA	General			On Draft1 of the EMVCo 3DS v2.2.0 specification, we requested some clarifications and use cases / examples regarding the new features introduced in Bull. 207 i.e. Decoupled Authentication, Whitelisting and 3RI payments. In order to review and analyze potential implementation of these new features, we need to understand their objectives and modes of operation. In the Disposition of Comments released on Sept. 6 by EMVCo, the only clarification provided on this request for clarification is : "The right material to gain insight to the use-cases is rather the presentations made for the EMVCo associates during the various associate meetings. For the three features mentioned, we can in particular recommend the presentations given at the various TA and ad-hoc meetings through the years [2016 to 2018]".	We already had followed all those meetings and reviewed related materials before requesting these clarifications on Draft1. And we can confirm that these meetings, presentations and the corresponding slides and minutes do not provide any clear examples of use cases for these features. We propose that EMVCo ease the understanding of the different features and mode of operation of 3DS v2 by describing some typical 3DS operations for the different modes / usages (the best would be to add some example flows / sequences to the specs for standard payment authentication in APP and BRW, and some use of 3RI in NPA and then in PA, some Decoupled Authentication, ...). Or at least, could EMVCo provide main examples of each of these 3 new features in a few lines?	Accept	Thanks for this feedback. The 3DSWG is preparing for the upcoming TA session in Rome and will incorporate this feedback into our slide content. It would be good to provide some updated use cases in addition to the demos. And our focus will be on whitelisting, decoupled authentication, and 3RI NPA.

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TA	General			As already notified on v2.1 and Draft1 of v2.2, we confirm that there is general lack of definition on the presence conditions of the 3DS fields defined in Table A.1: The EMVCo 3DS specification indicates when a field is conditionally required but, in most cases, it does not indicate when a 'not required' field should be processed as 'N/A' or 'optional'. It seems implicit that when no presence condition is indicated, a field is always considered as N/A and shall be disregarded (e.g. when a conditionally required fields is not required because the condition is not verified). But this is never clearly indicated and it is subject to interpretations. This induces a significant risk of misinterpretation and interoperability issue (e.g. we already identified inconsistencies between our implementation and the	Proposal : Clearly indicate before Table A.1 that when the presence condition of a field only indicates when this field is conditionally required and/or optional, this field shall always be considered as N/A and shall be disregarded when the condition is not verified, unless another presence rule is explicitly indicated (e.g. for some existing fields, it is already clearly indicated that when the field is not required, it is considered optional).	In Progress	We are aware there are certain conditions that are not clear within the specification. Some of these conditions are being clarified in an upcoming bulletin in support of EMV 3DS v2.1.0. Would it be possible to get some examples to better understand how to remediate within the specification? If possible, can you send the examples via the query system to the 3DSWG?

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				interpretation of the specification in the laboratory Test Cases).			
TA		Protocol Spéc.v2.2.0 : Annex 1, Table A.1	Te MAJOR	The EMV 3DS specification defines that the ACS Reference Number and ACS Transaction ID are systematically required in ARes (and this is what is tested by the laboratory Test Cases). But when the Cardholder Account Number received in the AReq message is NOT in a participating account range, then the DS shall return to the 3DS Server an ARes message to notify the error. In this case, by definition, the DS is not able to obtain the ACS Reference Number and ACS Transaction ID (and ACS Operator ID if used by this DS).	Proposal to indicate that these field are conditional in ARes = required when an ARes from the ACS is received by the DS and N/A in the other case. Else, at least, the specification shall clearly indicate that the DS shall send these fields with a default and insignificant value in ARes when no ARes has been received from the ACS.	Reject	This question has been addressed under our FAQs. Please refer to FAQ #1 under specification FAQs. Please refer to the FAQ PDF under https://www.emvco.com/emv-technologies/3d-secure/

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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	Reminder (comment on draft1 accepted by EMVCo but not taken into account in draft2) 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 (e.g 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 N.A. for other EMVCo Messages and for other TS. 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	Accept	The 3DS Requestor Decoupled Request Indicator will remain with values Y and N as the specification is moving away from Boolean values. Those existing Boolean values will remain within the specification. The ACS Decoupled Confirmation Indicator conditions will be further defined prior to the final publication of EMV 3DS v2.2.0. The 3DSWG feels it is important to explicitly state whether or not the ACS will support decoupled on the transaction. This is especially true when the ACS does not support Decoupled.

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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).	value (when absent) and the conditions when ACS Decoupled Confirmation Indicator is optional must be clarified.		

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TA		Protocol Spéc.v2.2.0 : Req 61 and 123	Te MAJOR	<p>Reminder (comment on draft1 accepted by EMVCo but not taken into account in draft2)</p> <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>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 allows the 3DS</p>	Accept	The 3DSWG will be updating v2.2.0 to include the values of R, A, U within the RReq under requirements 61 and 123. The definition of values I and D are defined under section A.7.7.

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				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.	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. + Please provide clear definition of when new values TS=D and I can be used (in which message, modes, ...).		
TA		Protocol Spéc.v2.2.0 : Table A.1	Ed minor	Reminder (comment on draft1 accepted by EMVCo but not taken into account in draft2) 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	Change made to indicate Final CRes in Message Inclusion column.

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TA		Req 88 / Seq 3.99 / Step 6 / page 59 AND e.g. browserTZ / Table A.1 / Annex A.4/ page 167	Technical (te) - Major	[Req 88] Requires a 3DS Server to ensure availability of the necessary information for the AReq message and states that the 3DS Server ends 3D Secure processing if data is missing. Several Browser 'device data' attributes (e.g. browserTZ) are listed as mandatory for the Browser Payment flow in Table A.1 (Annex A.4). This means that only those 3DS1 Merchants who modify their websites and 3DS Integrations to gather, and provide, Shopper browser information, will be able to use 3DSv2 authentication. This applies even to Merchants who use a 3rd Party 3DS Requester (such as a Payment Service Provider) to initiate their 3DS Flow since this additional Browser data must be passed from the Merchant-Shopper domain, via the 3rd Party PSP, to the 3DS Initiator domain, so that it can be included in the AReq.	The specification should be revised (Table A.1) to make browser device data, which is currently marked as mandatory within the AReq message, optional. This includes: Browser Accept Headers Browser IP Address Browser Java Enabled Browser JavaScript Enabled Browser Language Browser Screen Color Depth Browser Screen Height Browser Screen Width Browser Time Zone Browser User-Agent Note: Merchants will be incentivised to upgrade their technical integrations to supply	In progress	For the current EMV 3DS version 2.1.0 of the specification, it was agreed no changes are to be made to the current conditions of these data elements. If the data element cannot be collected at the time of the transaction, it will be up to the DS Operator and their Program Rules to determine if that transaction is compliant. However, the 3DSWG sees the importance of ensuring successful merchant integrations and will further examine these conditions in future versions of the specification.

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				Also, since JavaScript is the only mechanism available to collect the majority of the required Browser device data, the 3DS2 flow is unavailable to any Shopper environment that does not support JavaScript. This will also preclude some large Merchants from adopting 3DS2 who, for example, offer in-game purchases via games console Browsers, which do not support JavaScript. Further, The Standard is inconsistent with itself since mandating Browser device data effectively mandates Browser JavaScript support, which contradicts the intent of Seq 3.135 and Seq 5.91, which state that ACSs must support a fall-back for environments that do not support JavaScript. In the European Economic Area, PSD2 has mandated that all payments (that do not qualify for an exemption) must be subject Strong Customer Authentication	the above data in order to increase the likelihood of frictionless flows for their Customers (Shoppers). Where the above data is not passed Issuers will almost certainly require the challenge flow to be executed. The benefits of implementing the suggested change are: · PSPs will be able to automatically migrate their EEA Merchants to 3DS2, without the need for them to complete a technical reintegration, allowing them to continue to take e-Commerce payments after September 2019. · Merchants and Shoppers that depend on Browsers that do not have JavaScript support, or JavaScript enabled, will still be able to make e-Commerce payments after September 2019.		

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				<p>(SCA) by September 2019. Whilst we understand that 3DS1 is capable of authenticating Shoppers in a manner that meets the requirements of SCA, most European Issuers' ACS implementations do not meet the SCA requirements of PSD2. Our understanding is that Issuers are planning to meet the requirements of PSD2 SCA through their, Scheme mandated,, 3DS2 ACS implementations *only* - I.e. Issuers are not planning to upgrade their 3DS1 ACS implementations to comply with PSD2 SCA (they are understandably keen to avoid double spend).</p> <p>The implications of the above situation are that:</p> <p>1. EEA Merchants *must* complete technical integrations to 3DS2 before September 2019. If they do not, they will be unable to take online payments after</p>	<p>· The EMVCo 3DS2 Standard is consistent in its requirement to provide support for Browser flows where JavaScript is not available - e.g. in some games console Browsers.</p> <p>· The goal of the 3DS2 protocol of providing frictionless 3DS flows is still satisfied as Merchants will want to enhance their integrations to gather/provide Browser device data in order to achieve frictionless flows for their Shoppers, which will result in improved conversion rates and financial benefit to the Merchant.</p> <p>The implications/risks of not implementing the proposed change are:</p> <p>· Merchants will not be able to enhance their technical integrations to gather the required Browser device data in time for the PSD2 September 2019 deadline and will, therefore, not be able to take e-Commerce payments beyond this date. Depending on</p>		

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				<p>this date. This date is unachievable given: EMVCo's 3DS2 launch date, the number of Merchants who are impacted and must re-integrate, the fact that many Merchants integrate via 3rd party applications (e.g. Shopping Carts) which must be upgraded to pass device data before the Merchant can upgrade their integration.</p> <p>2. Post September 2019, only Shopper Browsers that are capable of supporting JavaScript, and have JavaScript enabled, will be able make Payments subject to PSD2 SCA jurisdiction.</p> <p>Therefore, *we propose that EMVCo make Browser Device Data optional in the AReq*. This will allow PSPs to migrate Merchants from 3DS1 to 3DS2 flows without the need for the Merchant to alter their technical integration with their PSP/3DDS Service Provider; this, in turn, will enable the PSD2 SCA September</p>	<p>all Merchants being able to re-integrate in order to provide device data ahead of September 2019 represents a significant risk to Merchant, PSP, Acquirer and Scheme revenues.</p> <ul style="list-style-type: none"> · Shoppers who use Browsers which do not have JavaScript support available or enabled, will not be able to make Payments after the PSD2 SCA mandate deadline. · The 3DS2 Standard is inconsistent with respect to its position on whether Browsers must support JavaScript 		

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Document: EMV 3-D Secure Protocol and Core Functions Specification, Version 2.2.0 Draft 2

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				<p>2019 deadline to be met. Note that: (a) the proposed change is backwards compatible with earlier versions of the 3DS2 specification since all existing integrations where device data is supplied remain compliant; (2) Merchants will continue to be incentivised to make the technical changes to provide device data to their 3DS2 integration since, without device data, the frictionless flow is unlikely to be available to their Shoppers.</p> <p>If EMVCo do not make the proposed change, and European Issuers do not upgrade their 3DS1 ACS implementations to meet PSD2 SCA requirements (as we understand to be the case), there will be significant negative impact on Consumers, Merchants, PSPs, Acquirers and Schemes resulting from the inability of Merchants to accept e-Commerce payments, leading to reduced payment volumes.</p>			

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Dual	A.4 EMV 3-D Secure Data Elements	Table A.1 EMV 3-D Secure Data Elements	Te	As part of Article 17 of the Regulatory Technical Standards for SCA payment service providers need the ability to flag transactions as part of “dedicated payment processes” thereby signalling they are exempt. By way of example, for corporate payments, many merchants have secure business to business websites that are not available to the public, use security procedures at least as strong as SCA, and are dedicated to the respective company. Merchants need a way of flagging these to the PSP as exempt.	Include a new flag to identify these transactions as part of Dedicated Payment Process (“DPP”). The DPP flag may best be identified as a new 3RI Indicator. Card brand rules may need to define which PSPs, merchants, and payment methods qualify for this flag.	In progress	Can you help the 3DSWG understand why a 3DS message would be initiated if these transactions are exempt under PSD2 regulation?

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Dual	A.4 EMV 3-D Secure Data Elements	Table A.1 : 3DS Requestor Challenge Indicator	Te	threeDSRequestorChallengeInd can have the values "02 = No challenge requested" and "03 = Challenge requested (3DS Requester preference) The difference between the two values is not clear. Given that 02 is not preference, does that mean that ACS is expected to respect this value and not challenge at all times?	Clarifying the difference between the two values	Reject	The definition of the values is clear as it indicates the 3DS Requestor's preference as to whether or not they would like a challenge on the transaction. However, the ACS and Issuer will always have the final decision as to whether to agree to the 3DS Requestor's request or to make their own decision on the transaction.

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Dual	A.4 EMV 3-D Secure Data Elements	Table A.1 : 3DS Requestor Decoupled Request Indicator & Transaction Status Reason	te	threeDSRequestorDecReqInd allows for a value "N = Do not use Decoupled Authentication", while transStatusReason could have a value "22 = Decoupled Authentication required by ACS but not requested by 3DS Requestor" It can be inferred from the two values in AReq and ARes that the ACS has the final call to require decoupled authentication even if the 3DS requester specified threeDSRequestorDecReqInd=N, which contradicts with [Req 106]	Clarifying ACS allowed behavior when threeDSRequestorDecReqInd=N and when a transStatusReason=22 could be returned.	Reject	The ACS always has final decision on how to respond to the AReq message from the 3DS Requestor (frictionless authentication, challenge, etc.). Decoupled authentication is treated in the same manner other than the fact that decoupled authentication can only occur if it is requested by the 3DS Requestor.
TA	4.2.1.1	Fig 4.3, 4.4	ge	It is not clear if the DS logo is the same as a Card Network logo.	Clarify if DS logo is synonymous with Card Network logo	Reject	The DS Operator does not necessarily have to be a card network and therefore the logo could be a logo outside of a Card Network. That image is an example only.

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TA	4.2.1.1	Fig 4.4, 4.5	ge	Technically, a transaction by a card network has not begun at this point, because this is an authentication flow prior to a routing decision and authorization request.	Remove the first screen that has only card network logo with processing indicator and two second delay and start immediately with the second screen.	Reject	The screen is required during the AReq/ARes processing for a frictionless or challenge decision.
TA	4.2.1.1	Fig 4.4, 4.5	ge	Technically, a transaction by a card network has not begun at this point, because this is an authentication flow prior to a routing decision and authorization request.	Remove the first screen that has only card network logo with processing indicator and two second delay and start immediately with the second screen.	Reject	The screen is required during the AReq/ARes processing for a frictionless or challenge decision.

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TA	4.2.1.1	Fig 4.5	ge	Since this is an authentication before a routing decision, it is premature to determine what Card Network logo to display.	Promote issuer brand alone and leave the flow payment brand agnostic	Reject	Displaying the Issuer logo would require each 3DS requestor to store and manage each Issuer logo for every transaction. This was previously discussed within EMVCo with the Technical Associates and agreed it was not manageable and therefore agreed to display the DS logo. The DS logo is already determined at the time of the authentication request as the 3DS Server needs to know to which DS to route the authentication request.

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TA	Annex B	Table B.1	ge	Acquirer BIN is a designation from a payment brand and it presupposes the brand that will be selected for routing.	It isn't clear it is needed at all since an acquirer will populate it in the authorization request.	Reject	Acquirer BIN will remain as a data element within the Authentication Request and is an existing data element in 3DS v1.0.2. This data element is required within the authentication request as many enrolment processes are built around the Acquirer and their relations with the merchants.
TA	3.1	Seq 3.12 Req 11	ge	It isn't clear what happens in the event that more than one DS is available for a BIN range.	Perhaps either clarify if the logic for selection of DS is outside of the scope of the specification or add content that describes the process of selection.	Reject	This question is addressed on the EMVCo website under our FAQs (#12 under General). You can locate the FAQ PDF file at https://www.emvco.com/emv-technologies/3d-secure/

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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