DP-288 – Non-Functional Requirements Revision

TPG Telecom would like to provide the below feedback:

Non-Functional Requirement Issues

Dynamic Client Registration

TPG Telecom acknowledges that no change is being recommended as part of this Decision Proposal. However, we do seek continued consultation through the upcoming Decision Proposal to allow Data Holders a mechanism to perform whitelisting and to meet their obligations concerning Dynamic Client Registration.

Scaling NFRs for large Data Holders

TPG Telecom does not support option 3 - *Increase in the Site Wide TPS and Session Count NFRs* - based on the published metrics [Performance | Consumer Data Right (cdr.gov.au)](#). The average TPS is well below the current site-wide TPS required by the Consumer Data Standards. Therefore, this option will result in an ongoing and significant regulatory cost burden with no apparent connection to technical needs.

TPG Telecom does not support option 4 - *Removal of site-wide TPS and Session Count NFRs*. This option would remove the fixed upper limit of required TPS by Data Holders. As additional ADRs with additional software products are onboarded and to support the 50TPS per Data Recipient Software Product requirement, Data Holders must continuously increase their available TPS, regardless of whether these limits are necessary. Again, this option will result in an ongoing and significant regulatory cost burden, with no apparent connection to technical needs.

TPG Telecom would need further information on option 1 - *Tiered TPS and Session Count NFRs based no the number of customers the data holder has* in order to provide further feedback on this option. Specifically, what the proposed tiering levels would be.

Similarly, TPG Telecom would need further information on option 2 - *Tiered TPS and Session Count NFRs based on the number of active authorisations the data holder has*, to provide a position on this option. Specifically, what the proposed tiering levels would look like, and what the expectations would be around the Data Holders' ability to scale if new use cases were introduced, which led to a significant increase in the number of active authorisations held by a Data Holder.

TPG Telecom recommends that adjustments are proposed once a better understanding is gained about the actual average TPS required to be supported by Energy Data Holders.

As additional industries are onboarded to CDR, each sector is expected to experience different traffic volumes. This should be factored into the decision rather than a one size fits all approach.

TPG Telecom suggests that it may be better to address these issues on a use case-by-use case basis (such as the migration of some banking customers from screen scraping to CDR that precipitated these discussions), rather than trying to have a fixed solution that will likely result in several Data Holders having to support significantly higher volumes of traffic than will ever be required.

NFRs for incident response

TPG Telecom appreciates that no specific recommendation is being made as part of this proposal but recommends future consultations to enable participants not currently involved in the incident management working group to provide feedback.