VISA

23 November, 2018

The Treasury
Langton Crescent
Parkes ACT 2600

Dear Sir/Madam

Call for views on working draft of the Consumer Data Standards

Visa Inc. ("Visa) welcomes the opportunity to comment on the working draft of the Consumer Data Standards developed as part of the introduction in Australia of the Consumer Data Right legislation to give Australians greater control over their data.

We offer, for your consideration, some potential adjustments to the proposed draft standards:

#	Data Type	Recommendation if applicable
1	Common Data Field - Currency String	• Recommend changing field name to Currency Code in line with ISO 4217 • Recommend listing USD, GBP, AUD as examples
2	Common Schemas - Transaction ID	• Define who generates the ID • Define what the transaction ID is
3	International Payee Type	• Recommend using ISO 9362[1] standards for this field
4	Credit Card Account Type	• Recommend adding option for Card Art support • URL for Card Art • Card Art Height/Width size in pixel fields
5	Credit Card Account Type	• Optional name that describes the PAN
6	Payee ID	• Recommend listing source of generated ID
7	Product Category	• Recommend adding a RFU, spare or custom enumerated values

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[1] ISO 9362 defines a standard format of Bank Identifier Codes (also known as SWIFT-BIC, BIC, SWIFT ID or SWIFT code) approved by the International Organization for Standardization (ISO). It is a unique identification code for both financial and non-financial institutions. For more information, please see:
https://www.iso9362.org/

#	Data Type	Recommendation if applicable
8	Product Feature Types	• Recommend adding a RFU, spare or custom enumerated values
9	Product Discount Types	• Recommend adding a RFU, spare or custom enumerated values
10	Product Deposit Rate Types	• Recommend adding a RFU, spare or custom enumerated values
11	Product Lending Rate Types	• Recommend adding a RFU, spare or custom enumerated values
12	Account Feature Types	• Recommend adding a RFU, spare or custom enumerated values
13	Account Discount Types	• Recommend adding a RFU, spare or custom enumerated values
14	Account Deposit Rates	• Recommend adding a RFU, spare or custom enumerated values
15	Account Lending Rate Types	• Recommend adding a RFU, spare or custom enumerated values

Visa appreciates the opportunity to provide our perspectives on the working draft of the standards.

If there are any queries on the comments provided, I am available at hseidel@visa.com

Yours sincerely

Helen Seidel
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Visa Australia, NZ & South Pacific