

Data Standards Body Technical Working Group

Decision 70 & 71 – May Draft Feedback Response

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Context

On the 31st May 2019 a major checkpoint draft of the CDR standards was published and a three-week feedback cycle was initiated. This feedback cycle was officially closed on Friday 21st of June. On-going feedback is encouraged and will be considered for inclusion in future updates of the standards.

This decision addresses the majority of the matters raised in feedback. Specific matters of feedback are addressed in separate specific decision documents. This decision addresses the remainder of the feedback provided.

The feedback reviewed in this document can be found at the following links:

- Feedback on APIs and the standards as a whole:
<https://github.com/ConsumerDataStandardsAustralia/standards/issues/70>
- Feedback on the Information Security profile:
<https://github.com/ConsumerDataStandardsAustralia/standards/issues/71>

The specific matters addressed in this decision are itemised in the summary of feedback found in the document titled: *Draft Standards Feedback Summary - v0.9.3 May 2019*. Whilst the matters below are referenced to the organisation that raised them in the May feedback we have also conducted further consultation on these matters with other participants in the eco-system.

Decision To Be Made

A series of decisions in response to feedback provided regarding the May draft of the API standards and Information Security profile.

Decision For Approval

This document contains decisions related to the following issues identified in the document titled *Draft Standards Feedback Summary - v0.9.3 May 2019*:

- Feedback items on the API standards: A04 - A17
- Feedback items on the Information Security Profile: I05 - I06
- Minor items of feedback M01 - M12

API Standards Feedback

A04: Banking Transaction Detail

Feedback:

The submission from BPAY highlighted a series of concerns regarding the representation of NPP overlay and transaction data in the transaction payloads.

This included feedback on how overlay labels are represented, how extended data is represented, how PayID types are represented and how changes in NPP overlay services will be managed within the standard.

Decision:

The feedback on *endToEndID* and *purposeCode* will be included in the extended data for the x2p1 overlay service. Additional feedback related to incremental changes to the CDR standards arising from additions to the NPP ecosystem will need to be accommodated in ongoing maintenance and operational models for the CDR regime.

A05: Product Bundles

Feedback:

The submission from CBA restated previous feedback indicating that the complexity of product bundles is not fully captured by the current product reference data standards and that future work on a dedicated bundle end point should be undertaken.

Decision:

As previously stated, it is intended that the work to define a payload such that product bundles can be represented to the same level of granularity as individual products will be undertaken. This would not be included in the first version of the standard due to effort and time required to define this payload but will be targeted to support an implementation to production timeframe of 1st July 2020.

The current representation of bundles in the product reference data payloads is a minimal solution for the first version of the standards. While this structure does not encapsulate complex bundling arrangements it does allow for the existence of a bundle to be acknowledged and for additional information to be linked aiding decision making for a customer. Removing this minimal structure creates the risk that customers will be misled as to their options when reviewing the product information available. The feedback that linkage to other products within a bundle would potentially be impaired if the most commonly bundled products are not included in the Product Reference Data set results in a stronger argument that mortgages should be included for February 2020 and this feedback will be provided to the ACCC for consideration.

Commentary will also be added to the standards to indicate that the array of related product IDs for a bundle is not intended to be comprehensive or represent possible bundle configurations. The array is indicative only.

A06: Pending Transactions

Feedback:

The submission from CBA restated previous feedback objecting to the inclusion of pending transactions in the transaction data end points citing inconsistencies between the handling of pending transactions across institutions.

Decision:

The key criticism regarding the inclusion of pending transactions is the different handling of the transition of transactions from pending status to posted status. Some institutions are able to link transactions across these states and some are not. This variability can even apply to different products in the same institution in some cases.

Counter feedback has been received from potential data recipients indicating that leaving pending transactions out of the data sets will reduce their usability and will cause some recipients to remain with screen scraping rather than transferring to the CDR regime. This is due to the visibility of pending transactions in most Internet Banking implementations. Note that, based on the decided non-functional requirements, only the pending transactions made available in other digital channels would be required for inclusion in the transaction API responses.

To balance this feedback the standards include pending transactions but explicitly state that there is no ability under the standards to link a pending transaction to a posted transaction obtained at a later time. It is believed that this balanced position is the best outcome between the varying feedback received.

A07: Transaction Search

Feedback:

The submission from CBA restated previous feedback requesting the removal of search-based functionality (text, min-amount, and max-amount) as a method of filtering the transactions payload.

Decision:

For a data recipient to perform a text search on the text fields in a set of transactions it is necessary to have access to all of the transactions in the search set. The data holders have this set of transactions in all cases. The data recipients only have this set if they have previously obtained all relevant transactions for a customer. This means that a data recipient that does not need to obtain all transactions for a customer to deliver their service but wishes to offer text based searching of transactions would be required to obtain more customer data than they otherwise would. This undermines the intent of the data minimisation principle.

The feedback that the implementation of this capability would be costly and difficult is balanced against this need.

To maintain a balance between these conflicting needs the transactions search query parameter will be retained in the standards but will be made optional for implementation. This decision will be reviewed after 1st February 2020 to assess whether implementation will be made mandatory at that stage.

A08: Pagination

Feedback:

The submission from CBA restated previous feedback indicating a preference for 'cursor based pagination' using continuation tokens.

Decision:

This feedback indicates that transaction paging should be implemented to be exclusively based on a cursor pattern. It does not recognise, however, that cursor based paging needs an initial call for the first page that establishes the cursor. This initial call can be used repeatedly in most cursor based implementations to obtain each page. This is not considered good practice by a client but is still possible.

The current position of the standards is to define the mechanism for obtaining the first page using a random access pattern. For holders that so wish the fields in the links object can be used to create a cursor based implementation for pagination. For holders that wish to support random access only this can also be supported.

It is believed that this position of the standards facilitates, but does not mandate, a cursor based implementation by data holders without the need for data recipients to implement differently depending on the pattern utilised.

A09: Bulk Transaction Data

Feedback:

The submission from CBA restated previous feedback that the bulk APIs be considered optional for implementation citing implementation costs and potential performance concerns.

Decision:

It was the experience of the UK Open Banking regime that optional end points are implemented by a small subset of institutions. Consequently, data recipients did not implement clients for these end points as they were not reliably available. The feedback indicating that the bulk transaction end point should be made optional (along with the associated arguments) indicates the desire to leave these end points out of the implementation.

Not implementing the bulk end points does not remove the need for some use cases to obtain transaction data in bulk. Numerous valid use cases for transaction data require that all transactions for shared accounts be obtained on a daily basis. In the absence of the bulk end points this can only be achieved by repeatedly calling the account specific end points. This results in the same response burden for the data holder but reduces the ability of the data holder (and the regime as a whole) to manage this traffic in comparison to calls to the account specific end points that are driven by interactive experiences.

In summary, not including the bulk end points simply moves the valid calls to these end points to other end points and reduces administrative options.

In response to the feedback that the cost of implementation will be high and in the light of the concerns above the standards will be modified as follows:

- The end points that allow for access to transactions for multiple accounts will be removed rather than made optionally implementable (based on the experience in the UK)
- The non-functional requirements will be adjusted to facilitate the additional number of calls that would be anticipated by this change
- After 1st February 2020 the patterns of traffic and usage will be assessed to see if this decision should be revisited

A10: NFRs

Feedback:

The submission from CBA noted that decision was made regarding Non-Functional Requirements (NFRs) however these NFRs have not yet been documented in the Standards.

The submission also indicating concerns regarding the concept of 'as in digital channel' in the data latency section of the NFRs as not being appropriate when additional sectors are included in the regime where existing digital channels may not already exist.

The submission also suggested that the NFRs should be revisited in light of actual performance and usage during implementation.

Decision:

In response to this feedback the non-functional requirements that have previously been decided will be included in the standards documentation with a note indicating that they are not yet binding. The feedback regarding the 'as in digital channel' standard will be considered during the expansion of implementation in the banking sector and during adoption of the next industry sector as this may introduce a situation where an impacted data holder does not have an existing digital channel. This is not considered a high priority matter for this phase, however, as all impacted data holders have extensive digital channels already in place.

A11: Admin APIs

Feedback:

The submission from CBA indicated that the definitions for currentDay and previousDay are outstanding in the metrics end point. The submission recommends that currentDay be updated in line with the meta data refresh (pending registry SLA's) and that previousDay is T-1. The submission also indicates that the mechanism to authenticate the ACCC client should be clarified.

Decision:

Clarification of currentDay and previousDay will be incorporated into the standards as suggested. The standards already state that the ACCC client will authenticate in the same manner as data recipient clients through the use of PKI. The advertising mechanism for the

A12: PII Data

Feedback:

The submission from CBA restated previous feedback indicating that personally identifiable information for the authorising customer and for third parties should be excluded from the standards.

Decision:

The data included in the CDR payloads in the current version of the standard have been derived from the requirements of the CDR Rules and the Designation Instrument for the Banking sector. Feedback regarding the sensitivity of various data fields has been accommodated as much as possible while still aligning the standards with the requirements of the regime as a whole.

It is also noted, that while personal information is included in the data payloads that can be shared, extensive efforts have been undertaken to ensure that the sharing of this data is aligned with the requirements for explicit, clear and informed consent by the customer as required by the CDR Rules and proposed legislation. On this basis no changes will be made to the current draft.

A13: Data Coverage

Feedback:

The submission from FinTech Australia restated feedback that there are gaps in the data included in the CDR regime that are needed by Data Recipients to have a comprehensive source of data without the need to supplement the data from other sources. The specific gaps were noted.

Decision:

In previous submissions FinTech Australia highlighted a series of suggested data gaps. These gaps have been addressed as per the summary below:

- *“TransactionBasic and TransactionDetail schema should include a running account balance (ie available balance)”*

A running balance has not been included as the end points support filtering that makes a running balance misleading and difficult to compute. Available balance is available via the balance end points, however.

- *“The actual interest rate being charged or paid to the customer (including any discounts or bonuses)”*
- *“Maturity dates of products (eg term deposits, personal loans)”*
- *“Maturity dates of fixed interest rate periods within products (eg for mortgages) and periods to which bonus interest rates apply”*
- *“The interest rate that will apply once any fixed rate period or bonus period ends”*
- *“Whether loans have fixed or variable interest rates”*
- *“Whether loans are interest only or principal and interest”*
- *“Whether loans are offset against deposit accounts and, if so, which one”*
- *“Whether automatic credit card repayments are for the entire balance or minimum balance or some other amount”*
- *“Borrowing limits, including credit, overdraft and line of credit limits”*

It is understood that these items are included in the account details payload.

- *“Director information for organisations”*

This information is better be obtained from ASIC using the appropriate company numbers that are included in the customer payload.

- *“Account holder date of birth”*

This field was explicitly removed due to feedback during the consultation period on customer payloads and end points.

- *“Default status for customer (including details of the default, such as product, date of default, principal amount, outstanding amount with fees and interest)”*
- *“Guarantors linked to particular products”*
- *“Whether mortgages are for owner occupied or investment property”*
- *“Details of relevant security property or other secured assets (including type of security, valuation)”*
- *“Application details (including date of applications, products applied for, current status)”*

These items were previously assessed as outside the scope of the CDR Rules and Designation Instruments. Some of these items also introduce potential personal privacy issues or concerns.

A14: HTTP Header Changes

Feedback:

The submission from NAB recommended changes to the headers required for authenticated end points to facilitate risk based decisioning and fraud data correlation that will be used to protect the interests of the customer.

This feedback also requested that the optionality tables for headers be made more consistent in the standards documentation.

Decision:

Request headers covering the user agent of the originating device, customer identifier and last authentication date will be included in the standards. The first of these headers will be mandatory for attended calls and the second and third will be mandatory for all calls.

A15: Scope/Data Alignment

Feedback:

The submission from NAB restated previous feedback recommending that scopes should be aligned to the data structures to be shared (basic, detailed, etc).

Decision:

Due to the relationship between OIDC scopes and data cluster language the choice to align scopes to data clusters, as understood by customers, has been made rather than aligning them to the technical structure of the end points. The choice of scope boundaries has therefore been heavily influenced by CX testing. It is believed that this position will result in less customer confusion.

A16: Card Art

Feedback:

The submission from Visa restated previous feedback that digital card art information should be included in the standards to enable card-centric experiences.

Decision:

While information on cards associated with accounts can be classified as account related information the inclusion of cards, and therefore card related data, was not deemed to be in scope for the first iteration of the banking standards. Note that, in this case, a distinction is being made between issued cards (which can be associated with a variety of banking account types) and credit card accounts (which is an account that provides a specific form of personal or business credit). The issue of the sharing of data related to issued cards will be added to the back log for the regime to be considered after the baseline for initial implementation is defined.

A17: Payment Account Reference

Feedback:

The submission from Visa suggested that the Payment Account Reference (PAR) field should be included in the transaction data payloads.

Decision:

While this field could be an appropriate addition to the banking payloads it is believed that the consultation required to ensure the implications of the field are understood by all participants. As such this field will be added to the regime back log to be considered after the baseline for initial implementation is defined.

I05: Dynamic Client Registration

Feedback:

The submissions from the ABA and ANZ restated feedback in support of the adoption of Dynamic Client Registration.

The ABA submission noted that the Register design work is a contributor to this position and collaboration will be required to determine a final position.

Decision:

This section of the Information Security profile is subservient to the design of the CDR Register and will only be changed if the CDR Register design is modified to support dynamic client registration. It should be noted, however, that the Data Standards Body understands the requirements for the CDR Register to act as a tool for the regulator to deliver on its obligations regarding the CDR Regime. As such, while this position is not something that is being driven by the CDR standards, the Data Standards Body is supportive of the current design position of the CDR Register.

I06: Access Token TTL

Feedback:

The submission from CBA restated the feedback that the time to live for Access Tokens should be flexible and in the control of the Data Holder.

Decision:

The selection of a static ten minute TTL for Access Tokens was made in the light of the use of Access Tokens for measurement of non-functional requirements and as a mechanism for restricting excess traffic initiated by data recipients. Allowing flexibility in the setting of this TTL would impact the design of the non-functional requirements to provide a reliable baseline for data holders and data recipients to understand their obligations.

In response to the feedback provided, but in light of the above concerns, the non-functional requirements and Information Security profile will be adjusted as follows:

- Access Token TTL will be at the discretion of the Data Holder but will be required to be in a range of 2min to 10min
- Non-functional requirements for the number of sessions allowed for data recipients will be increased to assume a 2min TTL has been set

It is also noted that the ability to track the impact and frequency of changes to Access Token TTL will need to be discussed and agreed so that this aspect of the regime can be monitored and understood.

Minor Amendments

M01: Discount Amount Field

Feedback:

The conditionality fix applied to *BankingProductFee.amount* needs to be applied to *BankingProductDiscount.amount*.

Decision:

This feedback will be incorporated into the standard.

M02: Correlation Header

Feedback:

The *x-Correlation-Id* header is still erroneously included in the standard as being required for HTTP responses.

Decision:

This feedback will be incorporated into the standard.

M03: Additional Info For OTHER

Feedback:

It would be more appropriate for the *additionalValue* field to be classified as optional instead of mandatory for product types with an *OTHER* category. The *additionalInfo* field should still be required in this scenario to provide description of the *OTHER* type being specified.

Decision:

This feedback will be incorporated into the standard.

M04: Error Objects

Feedback:

The standards state that: “*If the response is unsuccessful (not 200 OK) the root object: MUST contain an errors object*”, however, discussions in GitHub have indicated that error objects will only be required in specific circumstances described by the standards.

Decision:

This feedback will be incorporated into the standard.

M05 PayID Payee Descriptions

Feedback:

The current description “Label of target PayID. Mandatory for an outbound payment” needs to be clarified as to what is meant by ‘label’? Does this mean the PayID Type or PayID Name?

Also, when a BSB/Account Number is used for an NPP payment instead of a PayID the user entered account name would be used. As a result it is suggested that the description should be updated for clarity, eg. “the name assigned to the BSB/Account Number or PayID (by the owner of the PayID)”.

Decision:

The descriptions of the NPP fields will be clarified in the standards to address feedback.

M06: NPP Service Type Values

Feedback:

NPP service overlays are named using lower case rather than upper case.

Decision:

The NPP service overlay values are enumeration values for CDR fields and are therefore aligned with CDR standards for enumerations. There is no perceived use case where not exactly aligning to NPP usage for these values will be impactful.

M07: NPP PayID Type

Feedback:

The enumeration values for NPP PayID types should be aligned with the NPP descriptions for aliases: email, telephone, ABN, organisation identifier.

Decision:

This feedback will be incorporated into the standard.

M08: BPAY Branding

Feedback:

For all description text, please ensure the BPAY is uppercase as per the BPAY brand guidelines.

Decision:

This feedback will be incorporated into the standard.

M09: isPreferred Flag

Feedback:

Request that all occurrences of isPreferred flag are made conditional for structural consistency and alignment to the field's description.

Decision:

This feedback will be incorporated into the standard.

M10: TPS Metrics

Feedback:

The metrics end point has peak and average TPS whereas the approved NFR decision from Decision #21 has peak and current TPS. If Data Holders should be reporting current TPS, then no historical data is required in the API structure.

Decision:

This change from decision 21 was adopted based on feedback provided to the Admin APIs consultation. This change will be incorporated when NFR documentation is added to the standards as per the response to matter A10.

M11 paymentSet

Feedback:

The paymentSet field should be an array and the description of the amount field is incorrect.

Decision:

This feedback will be incorporated into the standard.

M12: Customer Update Time

Feedback:

The lastUpdateTime for customer should be optional in both CommonPerson and CommonOrganisation – this is frequently unavailable.

Decision:

This feedback will be incorporated into the standard.