

Data Standards Body

API Standards Technical Working Group

Noting Paper – Action Initiation Framework

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Publish Date: July 7th 2021

Context

On 23 December 2020, the Government released the [Report of the Inquiry into the Future Directions of the Consumer Data Right](#) (Future Directions Report). Within it, a series of recommendations were made for the CDR to support an Action Initiation Framework, otherwise known as 'write access'. This could apply across all designated sectors within the CDR, including banking and energy, as well as future sectors.

To inform the Government's response to the Future Directions Report, the DSB and Treasury will be hosting a half-day virtual workshop on Tuesday 27 July 2021. This Noting Paper introduces the key objectives, principles and concepts of action initiation as well as the hypotheses for introducing a sector-agnostic Action Initiation Framework.

Importance to the CDR

The CDR seeks to improve consumers' lives by enabling convenient and low-cost access to and greater control over their data, and enabling consumers to act upon insights from that data.

Treasury is concurrently considering the expansion of CDR to new sectors to implement an economy-wide CDR and to deepen its capability. Action initiation – such as a third party making a payment from a customer's account or moving an account from one provider to another – is an example of deeper capability.

Informing the Government's response

Subject to the Government's response, the implementation of legislation to support this deeper capability could take 6 to 12 months, and a further time period for developing supporting rules.

As the Report recommended, the banking sector is being considered as a first sector for application for action initiation. Prior to designation of a sector, Treasury will undertake an assessment of a sector for action initiation. The assessment, amongst other things, is intended to ensure that the most efficient approach is taken to delivering target capability.

Treasury, the DSB, the OAIC and the ACCC have commenced preliminary work on existing sectors. This workshop will provide foundational information to assist the development of the Government's response to the Future Directions Report.

Request for feedback

This Noting Paper also defines a template and requests feedback on use cases the community finds important for consideration. Specifically, the DSB invites feedback on the following questions:

1. What industry use cases could be facilitated within the CDR (using the template provided)?
2. What re-use opportunities exist for existing use cases and industry integrations?
3. What implementation timeframes are considered reasonable?
4. What dependencies should be addressed or prioritised to support the implementation of Action Initiation?

Action Initiation Objectives

Under its Digital Economy Strategy, the Government's vision is for Australia to be a leading digital economy and society by 2030. The following objectives guide how an action initiation framework may apply as a whole-of-economy strategy:

OBJECTIVE 1. Consumer focused: CDR data sharing's focus is on enabling consumers (including businesses) to realise the value in their own data. CDR action initiation seeks to provide more effective, efficient, convenient and safe ways for consumers to interact with their current or potential suppliers of goods and services.

OBJECTIVE 2. Convenient: CDR aims to provide good customer experiences for its users.

OBJECTIVE 3. Inclusive: CDR aims to be inclusive to marginalised and disadvantaged consumers, both by ensuring that it is accessible and usable for them, and that it supports services that meet their needs.

OBJECTIVE 4. Encourage competition: CDR aims to support competition within the CDR system (participants and supporting providers), the sectors it applies to (e.g. among payment systems) and businesses who can access CDR-derived information products.

OBJECTIVE 5. Create opportunities: CDR aims to support innovation in technology, processes and business models within the CDR system (participants and supporting providers), the sectors it applies to and in businesses who can access CDR-derived information products to support their provision of services to consumers.

OBJECTIVE 6. Privacy and security: CDR aims to provide a high level of privacy and information security protections, thereby inspiring justified trust and confidence by participants and consumers.

OBJECTIVE 7. Efficient and fair: CDR aims to provide efficient mechanisms for participants and consumers.

OBJECTIVE 8. Competitive: The CDR must provide sufficient value in excess of its costs, resulting in it being competitive and viable in comparison to competing channels.

OBJECTIVE 9. Role of Government: CDR should intervene or impose specific requirements only where there is an established case for government intervention and where the private sector cannot be expected to otherwise provide adequate outcomes.

Key Design Principles

The following principles have been defined for consideration of recommendations made in the Future Directions Report and to be used in the design phase. In considering options and approaches to Action Initiation, these principles are not absolute and may have to be balanced against each other.

Note: these principles do not seek to replace the existing principles defined in the Consumer Data Standards that govern the data standards.

- PRINCIPLE 1. Consent driven:** CDR is a consent driven regime. Consent should underpin CDR participants instructing/using/acting on behalf of the consumer. Consent must be genuine.
- PRINCIPLE 2. Instruction layer:** CDR provides only an alternative channel for consumers to directly or indirectly¹ instruct² their service providers. CDR does not alter how the underlying ‘action layer’ (e.g. ‘payments layer’) operates.³
- a. **A new channel for facilitating existing actions:** CDR data sharing does not require data holders to collect or create data they do not otherwise hold. CDR action initiation should not require action providers to provide actions that they do not otherwise provide to the customer in relation to the goods and services they supply.
 - b. **Parallel operation:** CDR does not displace or restrict access to existing channels⁴ for stakeholders engaging with their service providers.
- PRINCIPLE 3. Minimising regulatory burden:** CDR should, as far as possible, seek to minimise and appropriately allocate the regulatory burden, in relation to all sectors and action types. It should seek to ensure that existing frameworks and builds can be leveraged, where appropriate.
- PRINCIPLE 4. Universality:** CDR seeks as far as is practical to implement frameworks that are standardised:
- a. **Across sector** - This promotes efficiency in design, implementation and operation. It promotes interoperability and lowers barriers to entry.
 - b. **Across actions types** – acknowledging that different arrangements may need to be put in place for some elements for different action types (e.g. information security uplift for payment initiation, different liability allocation rules for different action types).
- PRINCIPLE 5. Competitive neutrality:** CDR should avoid distorting the competitive dynamics in the underlying markets as far as is possible e.g. by being payment system agnostic.
- PRINCIPLE 6. Accessibility:** CDR should provide third parties⁵ with appropriate non-discriminatory access to service providers,⁶ on acceptable terms without compromising on

¹ via an authorised third party – currently Accredited Data Recipients.

² Currently CDR only supports instruction to provide data. The Inquiry recommends this be extended to instructions to perform other actions, including initiating payments.

³ CDR data sharing departs from this partially by creating obligations to take action (provide data) that may exceed those otherwise existing due to other commercial or legislative arrangements.

⁴ Such as data access arrangements or third party payment initiation schemes

⁵ e.g. Accredited Data Recipients, third party payment initiators

⁶ e.g. Data Holders, Payment Facilitators

information security.

PRINCIPLE 7. Interoperability (within CDR): CDR should support activities across sectors and across action types.⁷ CDR should support efficient use of both read access and action initiation through seamless customer experiences.

PRINCIPLE 8. Interoperability (outside of CDR): CDR should seek to support interoperability and consistent/integrated customer experiences with other digital frameworks, such as other action initiation frameworks (including payment initiation) and digital identity. The CDR should operate in a way that complements other frameworks that support value creation and the operation of the digital economy.

PRINCIPLE 9. Interoperability (international): CDR should seek to support alignment and interoperability with international data portability and action initiation regimes.

PRINCIPLE 10. Utilisation of standards: CDR should seek to utilise widely accepted international and domestic standards, unless a compelling case has been established not to do so.

PRINCIPLE 11. Innovation: CDR should seek to enable participants to create innovative CDR driven goods and services. CDR should seek to enable participants to innovate and to adopt different solutions/processes to achieve acceptable outcomes.

PRINCIPLE 12. Extensible: The CDR should support future expansion of functionality, including by industry voluntarily using the CDR to make additional data sets and, subject to the Government's response to the Inquiry into Future Directions for the Consumer Data Right, different actions available through the channel.

PRINCIPLE 13. Competitive ecosystem: The CDR should be designed in a way that promotes the growth of a competitive ecosystem both between CDR participants and their service providers (in various roles, including as intermediaries). It should also support competition between those providing services to consumers who are not within the CDR regulatory perimeter but who themselves are using CDR driven services.

PRINCIPLE 14. Consumer experience: The CDR should guarantee a minimum standard of consumer experience in consumer facing CDR processes. This may involve standardisation of consumer experiences (or may not).

PRINCIPLE 15. CDR does not displace the role of sectoral regulation. CDR is a channel for seeking information or seeking actions by service providers. CDR does not regulate activities due merely to them being enabled by CDR data or action initiation e.g. CDR does not impose payment facilitation or financial services regulation.

PRINCIPLE 16. Implementation: CDR should pursue orderly, transparent and efficient implementation processes that seek to reduce costs to government and industry while bringing the most value to consumers as fast as practicable. CDR implementation should

⁷ Read Access, Action Initiation, Payment Initiation

occur in a way that recognises the demands of other digital and sectoral regulatory initiatives.

The status quo

Currently the CDR supports data sharing (read access) within the banking sector. Work is underway to introduce data sharing to the energy sector and the telecommunications sector after that. In effect, the sharing of data is the first *action* that the CDR has introduced. The consumer is providing the data holder with the *instruction* to collect their data when requested and the *action* the data holder performs in response is the disclosure of the data to the ADR.

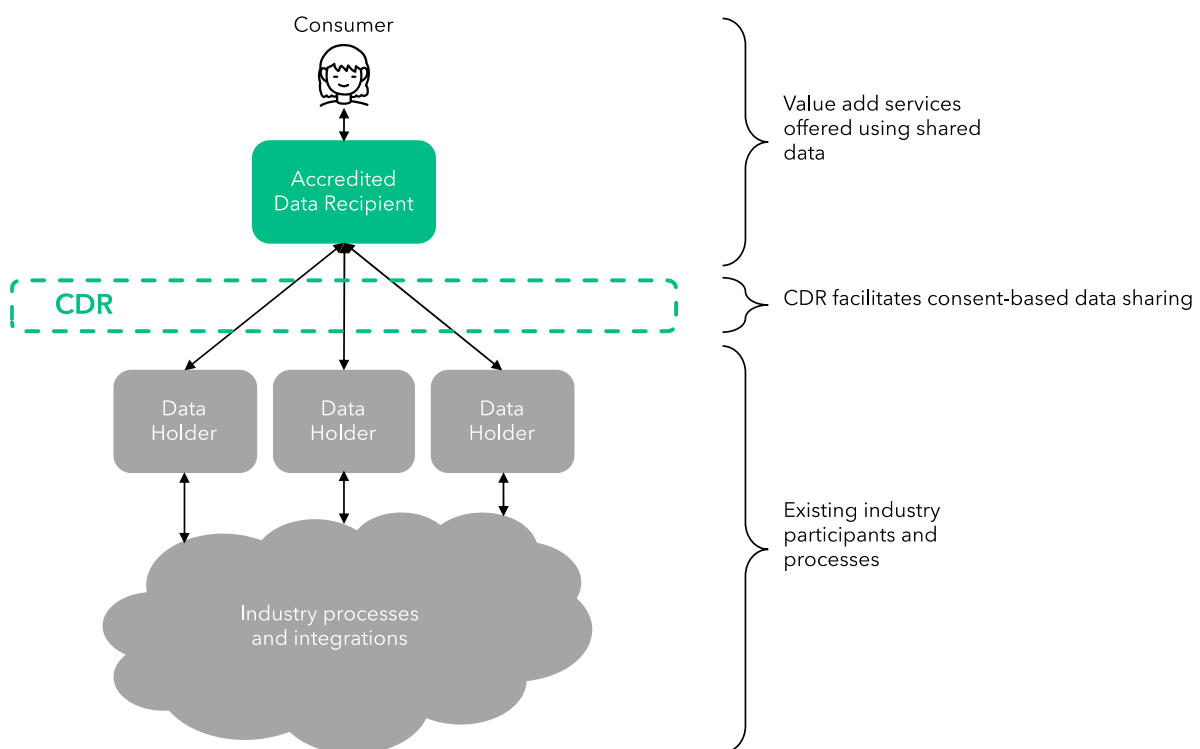


Figure 1: Status-quo data sharing

How data is shared, including the source of the data: be it a core banking platform, high performance operational data store or downstream white label integration is left to the existing industry processes and integrations is abstracted away from Data Recipients. The CDR doesn't define any technical standards to govern those pre-existing integrations and data holders still employ existing processes and business rules.

In Figure 1, those existing processes and integrations are shown in a grey box denoting they are outside the boundary of CDR standards. For data sharing, the CDR defines CX and technical standards that govern the connection of the Data Recipient to the data holder.

Action initiation framework

As we move into to action initiation, many of the same patterns and analogies apply. Rather than a Data Recipient, we have an Action Initiator which is a third-party entity accredited to initiate one or more actions within the regime. This Accredited Action Initiator (AAI) connects to a number of designated Action Service Providers (ASPs) that are similar to—or in many cases are—Data Holders. Indeed it is expected that ASPs are commonly Data Holders themselves.

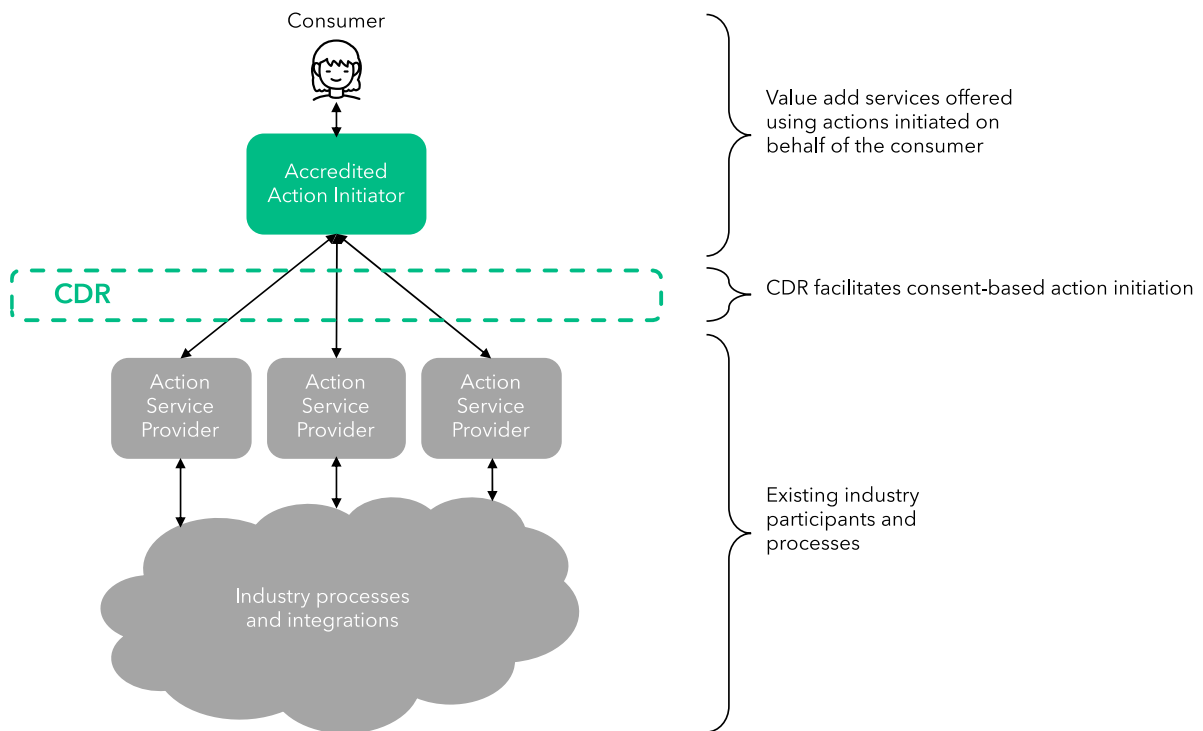


Figure 2: Action initiation framework

Supporting data sharing and action initiation within the CDR

Set side by side, action initiation and data sharing are expected to have similar boundaries where standards would apply. Broadly speaking, the CDR would look to define *how* a consumer can give consent to their AAI to *instruct* their ASP to act. How that action is performed falls within the existing industry processes and integrations. From this perspective, the CDR introduces a new channel to instruct the ASP but it doesn't seek to create a competing action layer.

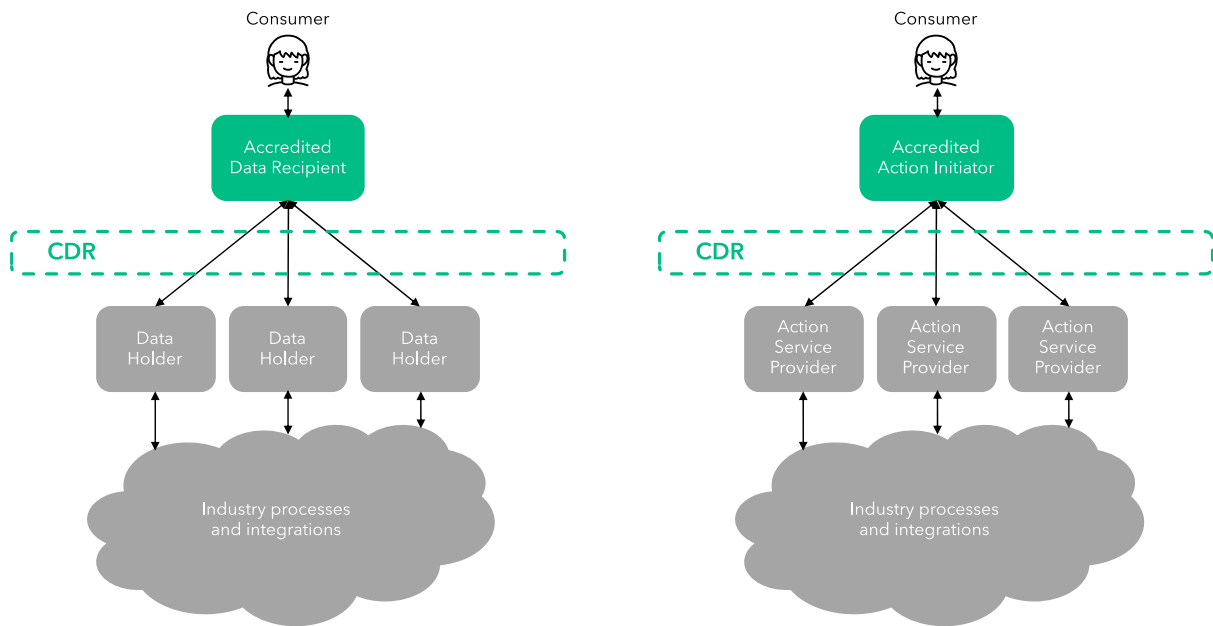


Figure 3: Comparison of data sharing vs action initiation

Table 1: Comparison of data sharing concepts vs action initiation concepts

Data Sharing	Action Initiation
Consumer Authentication	Consumer Authentication
Accredited Data Recipient (ADR)	Accredited Action Initiator (AAI)
Data Holder (DH)	Action Service Provider (ASP)
Consent for ADR to Collect	Consent for AAI to Instruct
Authorisation for DH to Disclose	Authorisation for ASP to Act
ADR accountable for valid use	AAI accountable for valid use
DH accountable for valid disclosure	ASP accountable for valid action

Take for example making a \$10,000 external payment through a bank's Internet Banking channel. The AAI can be considered as the bank's Internet Banking app and the bank itself the ASP. From this perspective, the customer is instructing their bank to perform a payment to an external bank account however the bank has a number of checks and balances it performs before determining its course of action. The bank may impose a daily limit on external transfers, maximum transfer amounts or additional security checks. The bank will also check that the customer has sufficient available funds to make the payment. If all checks and balances are successful, then the bank will action the payment to the requested external account. If one more of the checks and balances fail, the bank may take a different course of action, including rejecting the payment instruction and notifying the customer the payment is unsuccessful.

Instruction layer versus action layer

When a customer interacts with an organisation, the customer is giving the organisation an instruction to perform a desired action. Typically this instruction is given through one of the

organisation's own channels, such as an internet banking app, self-service smartphone app or call centre. The instruction provides the details necessary to perform the action for the customer's desired outcome. How that action is performed is largely at the discretion of the organisation and often involves many business rules to be run which may require further interaction with the customer. In some cases, the organisation may refuse to perform the action, perhaps because of a failed authentication challenge, a fraud signal, a business rule or condition is not met, or eligibility criteria preclude completing the action.

By introducing action initiation into the CDR, this introduces accredited third-parties that interact with the organisation's customer. The organisation then received instructions through new channels which it must action. In the context of data sharing, the consumer gives consent to a Data Recipient to instruct their Data Holder on their behalf to disclose data. The consent the consumer gives the Data Recipient is constrained by a variety of factors such as data cluster, duration and accounts.

As the CDR considers the expansion of action initiation to actions beyond read access, the DSB's hypothesis is that the CDR would define a standardised *instruction layer* whilst leaving the action layer to each industry and each ASP. In this way, the existing regulations, processes and integrations would be retained and ASPs would continue to provide competitive consumer experiences that leverage their existing business rules.

The instruction layer provides a convenient, secure and efficient way of enabling third parties to initiate an instruction on behalf of their customer, based on clear and informed consent.

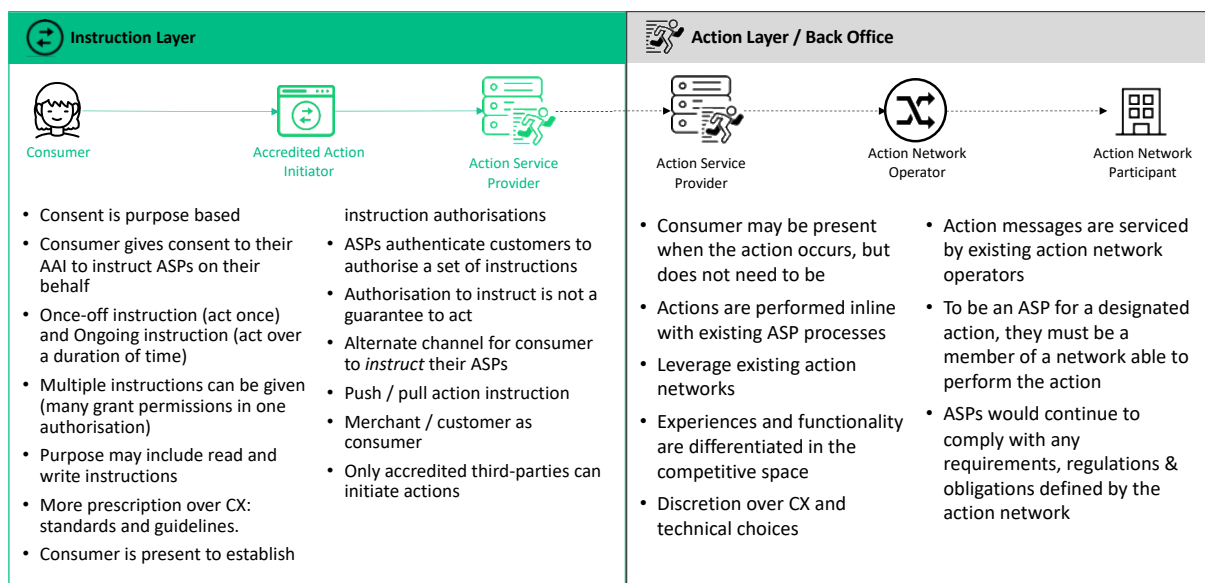


Figure 4: Comparison of instruction layer and action layer operations and behaviours

The prevailing hypothesis is where possible, the existing industry norms and legal frameworks are leveraged to perform an action. The CDR would seek to support a generalised instruction layer that is agnostic to the way each action may be performed. For example, a payment may be a transfer between a consumer's existing accounts, it may be a transfer between intrabank accounts, a card payment via a gateway, a domestic payment to another bank or international payment. Each of these are examples of payment initiation but they leverage a very different set of processes,

payments rails and have different liability and risk considerations. Even with a domestic payment, this may occur over BECS, NPP or other payments rails.

The CDR is not seeking to rigidly impose one payment system over another. Which payments network is relevant and how those integrations are defined would be outside the scope of the data standards. Instead, this is left within the competitive space where ASPs have control to leverage their existing infrastructure. For payment transactions this would mean that payment systems operators would handle the transfer of value in line with current processes.

It may also be that certain payments include payment network specific information (such as a PayID) which informs the ASP about which rails to use when making the payment - but this is done based on consumer choice and instruction.

Over time, the prevailing payment networks may change based on consumer update and bank support. A predominant payments scheme that is supported today, may be phased out tomorrow. By approaching action initiation from a generalised action-layer agnostic position, the CDR standards seek to avoid adopting point-to-point solutions and they can remain relevant without continual change as new payment schemes are introduced. This is an example specific to banking, but the concept would apply equally across sectors and actions.

Giving consent

The hypothesis is that the current norms defined by the CDR would be extended to action initiation. The CDR would simply facilitate alternative secure channels to allow consumers to instruct their ASPs to perform existing actions via Accredited Action Initiators (AAIs).

From this perspective, the AAI is acting like a digital power of attorney for the consumer able to initiate instructions on the consumer's behalf.

Who is the consumer

The consumer may be an individual or a business. Considering a payment as an example, this may mean that an individual could instruct their ASP to make push payments to a merchant. It may also mean that the merchant is a consumer and can request a pull payment from a customer by using an AAI to instruct their ASP to request the payment.

Authorisation considerations

The consumer must consent and authorise instructions to be established between their AAI and their ASP. Their ASP may also require intervention when actions are to be performed. For example the ASP may require approval to make a payment when requested by the AAI, it may require additional authentication, or perhaps the selection of the account they would like the payment to be made from in the event that their preferred account has insufficient funds available. Some processes may involve non-digital steps to be performed before an action can be completed.

Authentication considerations

In the same way that data sharing requires the consumer to authenticate with their Data Holder, the expectation is that the consumer must authenticate with their ASP. This may be supported by

different authentication methods beyond just OTP and it may also involve higher levels of authentication (step-up authentication).

Purpose-based action initiation

Typically, consumers have a problem or series of problems to solve and tasks to do along their consumer journey in order to achieve a set of desired outcomes. Often times, to achieve these goals, the consumer will need to perform a set of *actions* with a specific *purpose*. Whilst actions may happen in isolation, often times, a series of actions are likely to be performed under a common purpose.

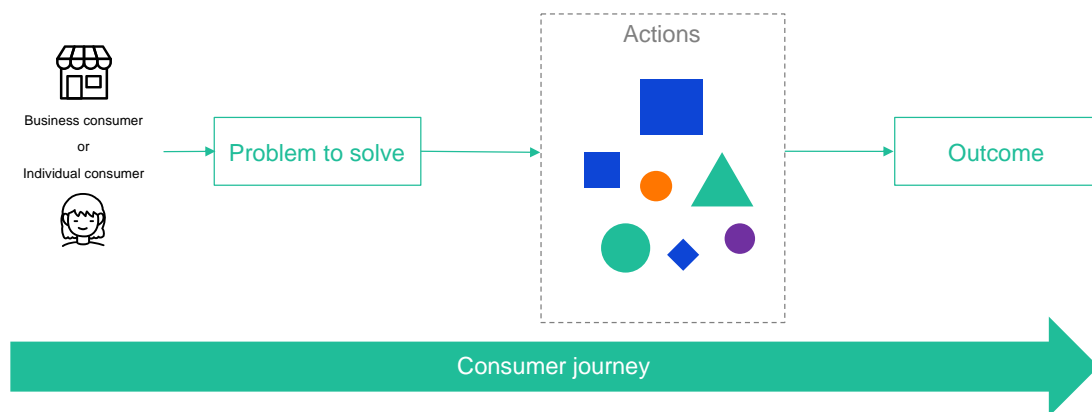


Figure 5 The CDR can facilitate consumer-centric outcomes by offering greater convenience and choice when the consumer is faced with a problem to solve or task to be done

For this reason, an action initiation framework needs to consider the purpose for which the consumer is giving consent to an AAI and the likely set of actions that will be combined. Commonly, the AAI will also need some level of read access to determine the status of an action, what instructions are held by the ASP and the outcome of any number of actions the ASP has performed.

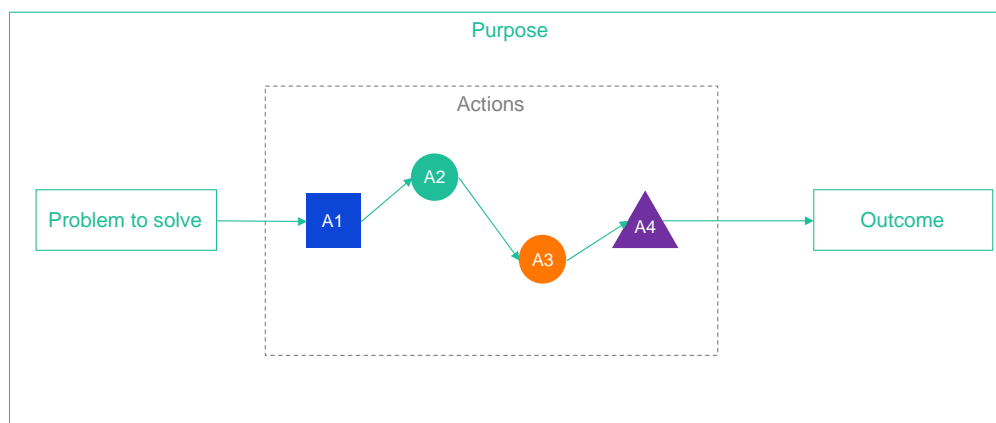


Figure 6: A purpose may be made up of many discrete actions

Rather than AAIs having to compose complex discrete consent arrangements that reduce the consumer's comprehension, this paper considers the need for purpose-driven consent which provides access to all complementary actions and read access to achieve the intended purpose.

The CDR therefore seeks to deliver a more convenient and secure experience than existing processes for third-party action initiation. In this respect, the responsiveness, convenience and quality of

service must be equal to or better than the current experience they get from their ASP for the AAI to be compelling.

Consent to instruct

Instructions may permit an AAI to act on behalf of the consumer in broad terms or the consent may include constraints that limit what the AAI may do, such as make only domestic payments up to a certain limit, or change only digital contact details but not physical contact details.

It is anticipated that consent may convey constraints on instructions intended to be provided to ASPs. For example, instructions may be limited by:

- A \$200 external transfer limit
- Restricted to updating online contact details only
- A one-time payment for a bill includes permission to instruct to only a single payee and nominated amount
- Instruction to originate one new credit card account only and no permissions to originate other types of accounts
- Fixed monthly subscription payment for a streaming TV service to a specific payee
- Variable quarterly scheduled payment for an electricity bill to a known energy retailer

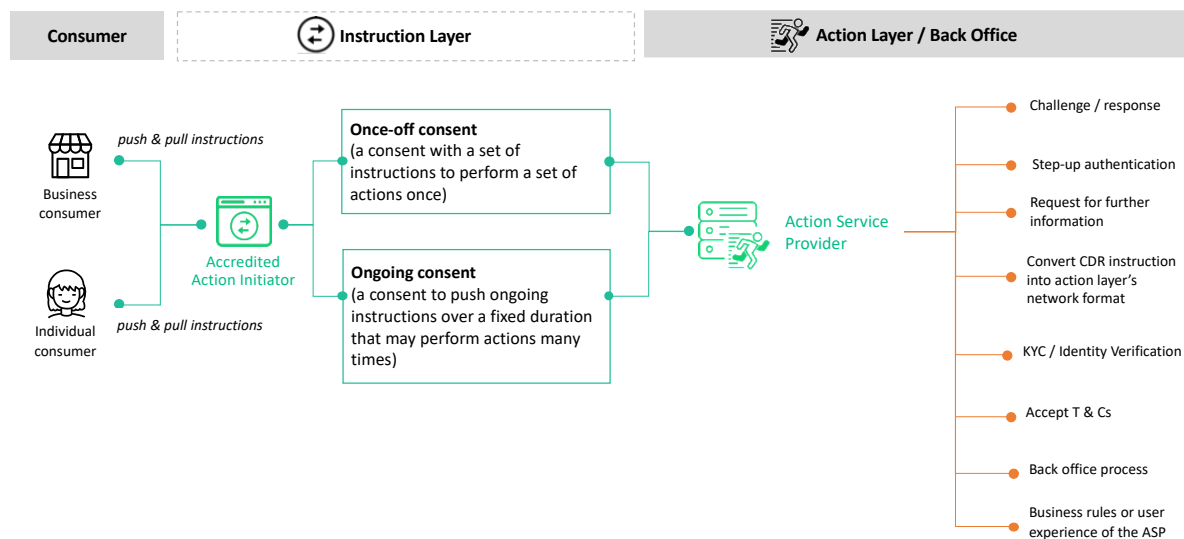


Figure 7: Action initiation flow showing the instruction given to the ASP where many proprietary processes or events (in orange) may occur as part of performing the action

Consent may be given for once-off instructions which may include more than one action including read access and action initiation. A consumer would give consent to a set of instructions to be performed on their behalf (once-off or ongoing) for a defined purpose. The AAI would pass an instruction set in the authorisation request where the ASP would first authenticate the consumer then confirm the authorisation and any other permissions required as defined by the data standards. Upon successful authorisation, the AAI would then instruct the ASP to perform actions by calling one or more Action APIs with instruction details.

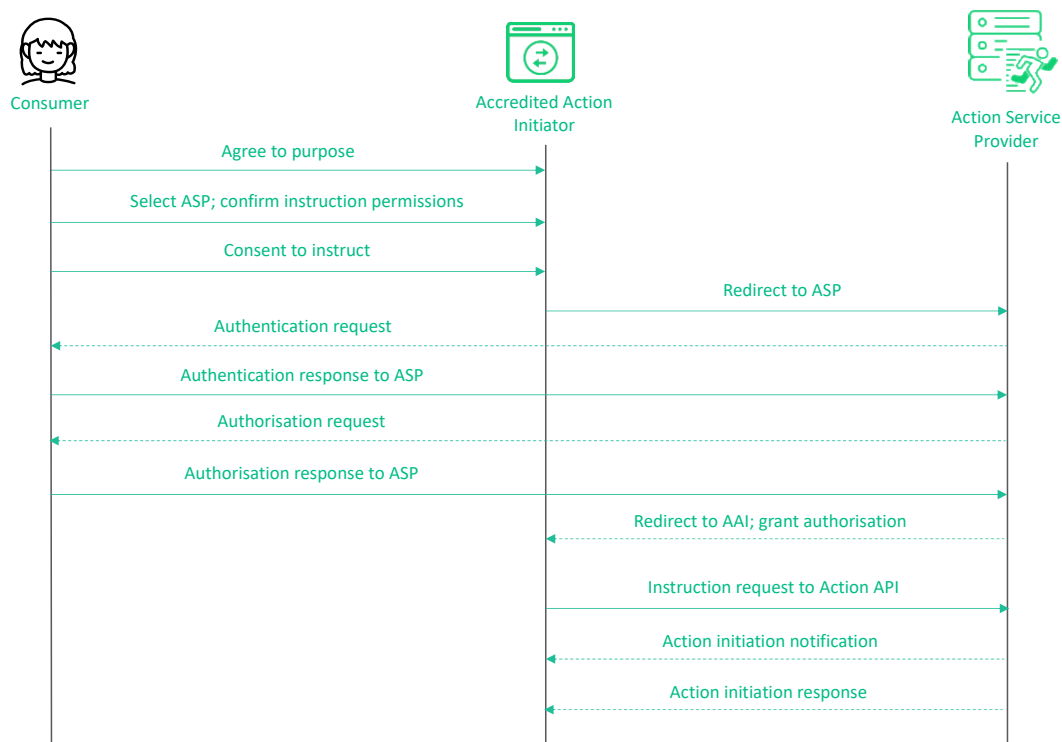


Figure 8: Similar to data sharing arrangements, the AAI would obtain consumer consent and request authorisation via the selected ASP. After which, the AAI is able to instruct the ASP to initiate actions on behalf of the consumer via a series of APIs

Push vs pull action initiation

Instructions may be executed that push an action such as a push payment, updating contact details or creating a new registered payee.

Instructions may also be executed that pull an action such as a merchant requesting payment for a monthly subscription from a customer or data sharing.

The method of instruction should be commensurate with the existing processes and norms of the industry. If an industry has a defined mechanism for account switching where the originating party can pull across all existing details to establish a customer relationship (say, switching bank accounts and moving loans, funds, payees, direct debits and customer information) then this should be possible within the CDR. If a mechanism is not defined within an industry, the working assumption is that the CDR would not seek to impose a different mechanism,. Rather, the CDR would seek to rely on the existing regulations, processes and solutions of the industry.

In the example of account switching, where pull-based mechanisms are not supported, it may require a series of actions to be performed in sequence whereby the AAI facilitates the orchestration

of a series of steps involving opening accounts with a new bank, moving funds and data, then closing accounts with the existing banks. This may be defined as a prescriptive set of action steps part of an industry-based purpose or the orchestration may be permitted within the competitive space for AAIs.

In line with the existing norms, actions may happen instantly, or may be conducted over an extended period of time. For example, closing a mortgage with a bank may require additional background processes and checks to occur within the bank before the action is fully executed.

Initiating an instruction versus completion of an action

When an AAI instructs an ASP to act, it is not a guarantee that the action will be performed immediately, if at all. Processes and controls of the ASP may take time or may deny the completion of the action per the instructions given by the AAI.

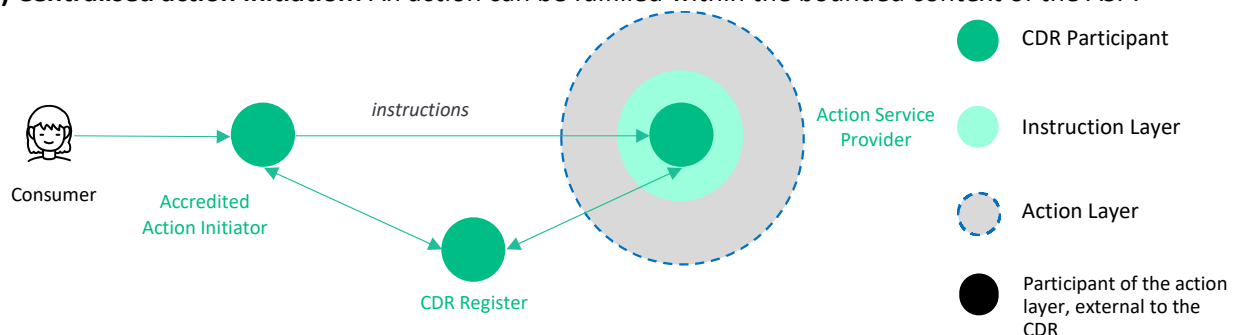
Notifications and communication mechanisms

Actions are not always guaranteed to happen in real time. Some actions may take place over minutes, days or weeks. Even with real-time actions, there may be the need to request additional information or require in-flow approval before the action is completed. It is expected that a two-way notification mechanism is required for many actions to notify the AAI on the status of an action and any intervention required by the consumer.

Action initiation models

As we have seen, performing an action may involve complex processes with existing integrations not governed by the CDR. Broadly speaking, this noting paper considers three models for action initiation: (i) centralised, (ii) federated and (iii) distributed action initiation. The purpose of these models is used to highlight the continuity of the instruction layer, irrespective of how the action is performed.

(i) Centralised action initiation: An action can be fulfilled within the bounded context of the ASP.

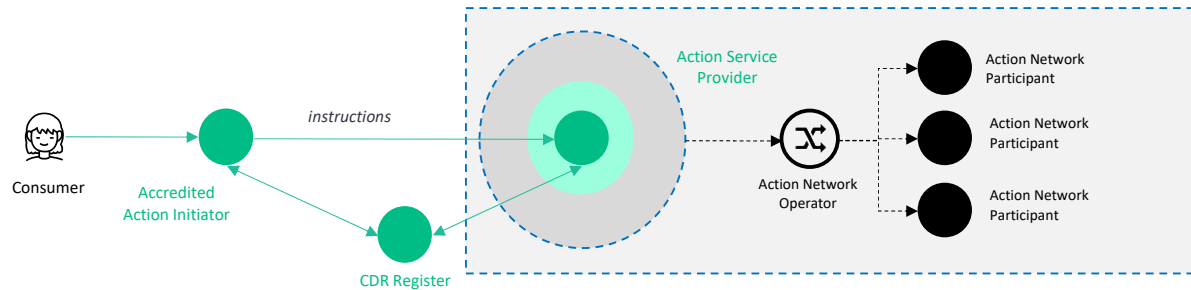


Examples include:

- Updating contact details
- Bank account data sharing
- Account origination
- Loan application

- Upgrade energy plan
- Intra-bank payment
- Renew term deposit

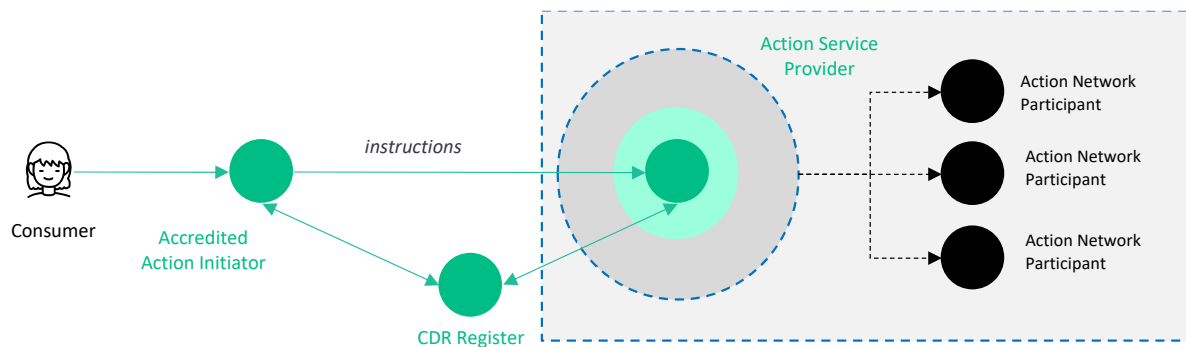
(ii) Federated action initiation: An action involves the transfer of data or value across an existing network operated outside of the CDR.



Examples include:

- NPP PayTo payment
- Transfer or update NPP PayTo mandate
- SWIFT payment
- BPAY / BECS payment
- Inter-bank payment
- Account switching⁸

(iii) Distributed action initiation: An action involves the transfer of data or value to multiple parties connected to an ASP but it does not involve a standard network operator to orchestrate.



Examples include:

- Update white label data
- White label bank transaction data sharing
- Account origination
- Account switching⁹

⁸ Account switching may involve push or pull mechanisms or a combination of consents to initiate discrete actions.

⁹ Account switching may involve push or pull mechanisms or a combination of consents to initiate discrete actions.

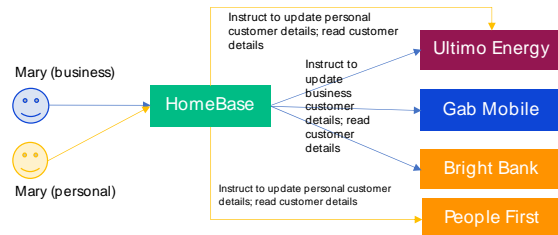
Examples of action initiation use cases

The following examples of use cases are illustrative of some of the concepts explored in this noting paper. These examples are not intended to be authoritative representations of how action initiation will work, but a hypothesis of what may be possible.

Use case 1: Tell Us Once personal information management

Mary is moving interstate and relocating her office as well as her family home. She uses a fintech app to notify all of her utilities and banks of change of address and update her details.

Multi-sector



ADR / AAI Experience	Instruction Layer	Action Layer / Back Office
<ul style="list-style-type: none"> Central management of contact details Verify all banks and utilities have Mary's correct contact details Verify disconnection of old plans Monitor status of updates and changes and notify Mary on change 	<ul style="list-style-type: none"> Read personal customer data Read organisation customer data Instruct energy retailer to move home and business energy connections and disconnect Instruct energy retailer to update contact details Read new energy plans list Read public telco product reference data Instruct telco to open new home and business broadband plans (upgraded plans) Instruct telco to close existing broadband plans Instruct bank to update contact address 	<ul style="list-style-type: none"> Energy retailer calls Mary to discuss new plan options, confirm connection and disconnect dates. This happens outside of the CDR. Telco retailer updates contact details and originates new broadband home and business plans. People First sends Mary an SMS verification code that she enters into the action flow. The SMS verification code page is hosted by People First. This in-flow challenge and verification is done with Mary present and the update is completed successfully. Bright Bank asks Mary to authenticate using her Bright Bank mobile app to approve the change. This happens outside of the CDR. Bank updates Mary's contact address in their CRM.

Use case 2: Personal finance management

Mary is a small business owner who runs a successful online ecommerce business.

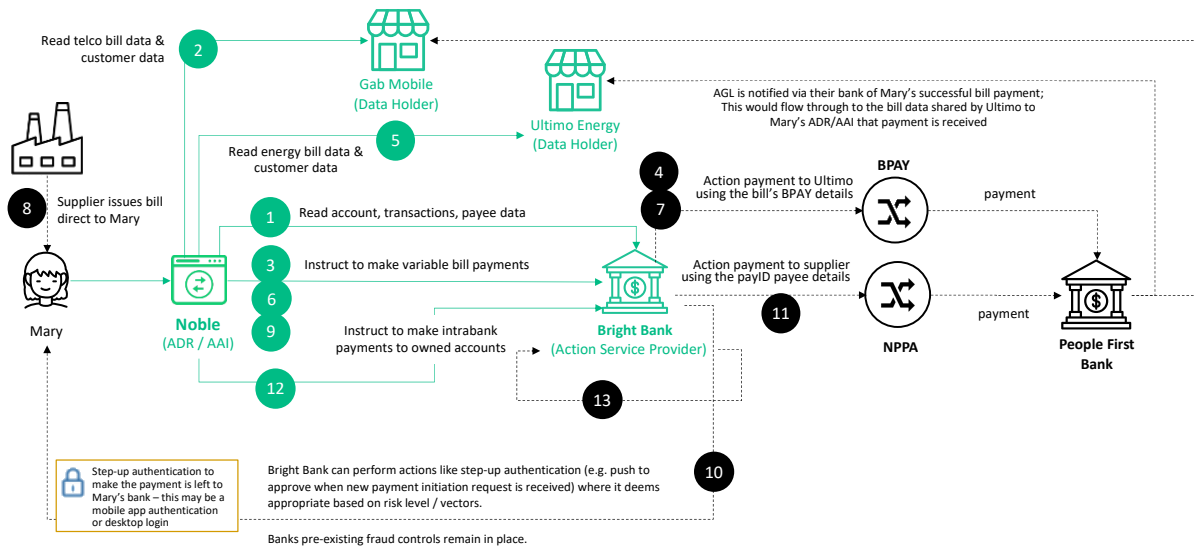
She chooses to use a third-party accounting platform that also takes care of her financial management.

Mary wants to be financially healthy so she uses Noble to ensure there is enough money set aside to pay her bills, tax and wages whilst ensuring she is saving money in her business for expansion.

Because Mary's business income is variable month to month she lets Noble look after budgeting rather than scheduling fixed payments with her bank.

Multi-sector

ADR / AAI Experience	Instruction Layer	Action Layer / Back Office
<ul style="list-style-type: none"> Manage suppliers and billers Monitor bills and ensure there is sufficient funds available to pay Predictive budgeting and financial management Just-in-time invoice payment Perform payroll Reconcile transaction data Manage sales, inventory and supply Predict and save for BAS payments Manage savings and transaction accounts 	<ul style="list-style-type: none"> Read payee data and add/update payees to make bill payments easy Read accounts to monitor bank balances Read transaction data to Read energy bill data to forecast expenses and get monthly bills Read telco bill data to forecast expenses and get monthly bills Instruct bank to make bill payments Instruct bank to pay supplier invoices Instruct bank to make scheduled payroll payments to Mary 	<ul style="list-style-type: none"> Intrabank payments (accountID to accountID) NPP payID push payments NPP PayTo scheduled payments BPAY payments Step-up authentication / authorisation to pay Fraud controls Manage payee data Serve up account and balance data from core banking software Serve up transaction data from operational data store



Other examples

A non-exhaustive list of example use cases already identified include:

- Home loan origination
- Refinancing
- Term deposit rollovers and redraws
- Account switching
- Executing a share trade including a financial advisor
- International payments
- Bulk / batch payroll payments
- House purchasing journey including pre-payment of deposit, land titles search, conveyancing, and issuance of a pre-approval certificate
- Comprehensive motor vehicle insurance quote and policy application

Responding to this Noting Paper

Use Case Template

Description

Describe the use case purpose and identify which economic sector(s) this use case applies to.

Benefits and Value

Value (High / Medium / Low). Describe, where possible, the tangible benefits and value that is offered by having this use case supported within the CDR.

Priority

Priority (High / Medium / Low). Describe, where possible, why you consider this use case to be a priority compared to other use cases the CDR should consider.

Actions

Describe each action to fulfil the use case.

Action 1: Action Label / Name

Action 1 Description: *What is the action being performed*

Action 1 Instruction: *What is the instruction that is provided to the ASP*

Action 1 Constraints: *What constraints would be imposed on the action (e.g. available balance, daily transfer limit, step-up authentication etc.)*

Risks and Issues

- *What are the risks to be considered when performing or instructing this action*
- *What issues (if any) are likely to occur. Where possible, clearly identify issues that may arise in in the instruction layer as opposed to issues that are likely to occur in the action layer.*

Conclusion

This Noting Paper does not seek to make any recommendations. The purpose is to inform the high level hypothesis around action initiation and to invite participants to provide feedback on this hypothesis and tangible use cases ahead of the workshop to be held on Tuesday 27 July 2021.