



EPC131-10
Version 1.0
19 May 2010
EPC

Latvia's

Comments on Change Request for the SEPA Credit Transfer Scheme

(Responses by e-mail to: info@europeanpaymentscouncil.eu or by mail to the address at the foot of this page)

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with support of Latvia's National SEPA Working Group

Organisation: Latvijas Banka on behalf of Latvia's National SEPA Working Group (NSWG), which represents all SEPA stakeholders in Latvia – consumers, companies, banks, public authorities, payment processing providers and payment technologies providers

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Your reference: 001.4.5.-08/2010/16

Scheme: SEPA Credit Transfer Scheme.
EPC125-5 version 5.0 (effective November 2011)

Date: 16 August 2010

Deadline: 17 August 2010

For information: This template is provided by EPC to allow any person or organisation to comment on the suggestions for making changes to the SEPA Schemes in accordance with the rules set out in the document 'SEPA Scheme Management Internal Rules' available on the EPC Website:
http://www.europeanpaymentscouncil.eu/knowledge_bank_detail.cfm?documents_id=155



1 GENERAL

The suggestions for changes received for the SEPA Credit Transfer Scheme due to take effect in November 2011 have been evaluated and the resulting recommendations are included in the attached document: EPC130-10.

Inputs from consumer organisations are not included as there are being handled in separate discussions with the BEUC.

2 COMMENTS

Your comments, in the form of answers to the following questions, are invited by the deadline of: 17 August 2010.

2.1 Overview of categories

The innovative suggestions for change have been categorized as follows:

a) **Already provided for** in the Scheme

- No action is necessary for EPC

b) The suggestion for change should be **incorporated into the Scheme**

- The suggestion for change becomes part of the scheme and the Rulebook is amended accordingly

c) The suggestion for change should be **included in the scheme** as an **optional feature**

- The new feature is optional and the RB will be amended accordingly
- Each Scheme Participant may decide to offer the feature to its customers, or not.

d) The suggestion for change is not considered fit for SEPA wide use and could be handled as an **AOS** by interested communities

- The proposed new feature is not included in the Rulebook nor in the Implementation Guidelines
- The development of AOS is out of scope of the EPC. However, EPC does publish declared AOS arrangements on its website for information
- EPC may consider the inclusion of AOS arrangements, if supported by a sufficient number of communities, in a future version of the Scheme.

e) The suggestion for change **cannot be part** of the existing Scheme

- It is technically impossible or
- It is not feasible (explained on a case by case basis) or
- It is out of scope of EPC

f) The suggestion for change may be considered for the development of a **new scheme**

- It contains major changes which cannot be integrated in an existing scheme
- To develop these suggestions further would need:
 - a top down analysis of the benefits for customers
 - an analysis of the additional costs involved



- the confirmation of a level of support by market players in the development phase
- sufficient engagement by market players to use such a scheme

2.2 Overview of requests received

EPC130-10 Ref.	Topic	Contributor	Result
5.2	DS-04 Purpose Code (EPC480-09-02)	EACT	Accepted – b
5.3	Reference to the EACT Unstructured Remittance Standard (EPC480-09-22)	EACT	Accepted – b
5.4	Additional reason for recall (undue payment) (EPC480-09-05 & 07)	Deutsche Post AG Renten Service and Spitzenverband der landwirtschaftlichen Sozialversicherung	Rejected – e
5.5	Category Purpose AT-45 to be mandatory (EPC480-09-17)	Portuguese Banking Community	Rejected – e
5.6	Inclusion of originators outside SEPA (EPC480-09-08)	Bank of America	Rejected - e
5.7	Provision of IBAN and address of Originator to the Beneficiary (EPC408-09-23)	EACT	Not feasible - e
5.8	Extended Remittance Information (EPC480-09-12)	BBVA Spain	AOS – d
5.9	Clarification of DS-01/DS-02 (EPC480-09-19)	EACT	Provided for - a
5.10	Information on initiator on the recall request (EPC480-09-31)	Spanish Banking Community	Accepted - a



2.3 Innovative Changes to Technical Operations in Chapters 3 and 4 of the Rulebook

Ref.	Topic	Proposal and alternatives	Voting results
5.2	Forward AT-44 to the Beneficiary when provided by the Originator	Accepted - b	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.3	Reference the EACT Unstructured Remittance Standard in the Rulebook	Accepted - b	No
		Do you agree with this proposal?	Yes/No
Further comments: The information about the topic was already provided in the "EPC Guidance on the Use of the Future ISO Standard for the "Structured Creditor Reference"". The Rulebook V.4.0. has been accordingly updated with the reference to this document.			

Ref.	Topic	Proposal and alternatives	Voting results
5.4	Additional reason for recall (undue payment)	Reject - e	Yes/No
		Do you agree with this proposal?	Yes/No
Further comments: Association of Latvian Commercial banks supports option <i>e</i> (reject). The Treasury supports <i>Deutsche Post AG Renten Service</i> and <i>Spitzenverband der landwirtschaftlichen Sozialversicherung</i> proposal.			



Ref.	Topic	Proposal and alternatives	Voting results
5.5	Category purpose (AT-45) to be mandatory	Reject - e	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.6	Inclusion of originators outside SEPA	Reject – e	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.7	Provision of IBAN and address of Originator to the Beneficiary	Not feasible - e	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.8	Extended remittance information	AOS - d	Yes
		Do you agree with this proposal	Yes/No
Further comments:			



Ref.	Topic	Proposal and alternatives	Voting results
5.9	Clarification of DS-01/02	No longer a change request as the requesting party has agreed that a clarification paper will be made available.	–
Further comments:			

Ref.	Topic	Proposal and alternatives	Voting results
5.10	Information on initiator in the recall request	Accepted – b	Yes
		Do you agree with this proposal?	Yes/No
Further comments:			

2.4 Minor Changes and Major Change of an Uncontroversial Nature

Section of the Rulebook	Description of the Change	Reason for Change	Comments
0.5.1	Text modification to make clear that the SEPA Data Model is no longer maintained as a stand-alone document	Update	OK
5.4	Amend typographical error in second bullet point to read "be either incorporated and licensed in a SEPA country or territory, or licensed by an appropriate EEA regulatory body"	Correction of typographical error.	OK
5.4	Amend first eligibility criteria to delete defined term "Customer" and replace with "customer". "Customer" is defined as a non-bank Originator or Beneficiary. This would preclude from eligibility payment services providers which wholly or primarily provided services only to banks. This exclusion was not intended when the Rulebook was drafted.	Correction of error in eligibility criteria.	OK



Section of the Rulebook	Description of the Change	Reason for Change	Comments
5.11	In section 5.11, reduce the notice period for termination by a Participant to three months. Also amend erroneous references to suspension of Participant status and clarify sections of the Rulebook which survive termination.	Clarificatory and amendment.	OK