



## Response template SEPA Cards Standardisation Volume 3.5

**Circulation: Cards Community**  
**Restricted: No**

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### Background

The EPC has prepared a revision to the SEPA Cards Standardisation Volume version 3.2.1. In this new version 3.5, the following are the major additions/enhancements in this version:

- Ch.3 "Functional aspects" (Cards Not Present aspects (i.e. e-Commerce and MOTO))
- Ch.7.1 related definitions

Attached is a template for your comments. Please e-mail this entire document with your response to [info@europeanpaymentscouncil.eu](mailto:info@europeanpaymentscouncil.eu) and specify **Cards Standardisation Volume 3.5** in the **Subject** field.

**Responses are requested by 30 October 2009.**

### 1. Commenting on the technical solution – due by 30 October 2009

Your name and contact details are requested.

<b>Name of responder</b>	Nicolas Adolph
<b>Organisation, including country</b>	EPSM, based in Germany, 56 members from 13 European countries 
<b>Contact details – e-mail address</b>	nicolas.adolph@epsm.eu
<b>Date</b>	30. October 2009

### 2. Comments on the Volume

Please use the table below to list your general and technical comments on the Volume

Section	Comment or suggested change
General	<b>It is very good, that many of the prior remarks have been considered in the new version!</b>



General	<b>The potential controversy around “application selection” and “multi-acquirer selection for the same application” should be discussed with market participants and competition authorities.</b>
General	It is very good to add the “remote” functions (e-commerce, Mail Order and Telephone Order) and also Manual Entry.  The topic of recurring payments and charge backs should be addressed in the next versions.
General	The numbering of the chapters is partially inconsistent, e.g. chapter 3.4.2.2.4.2 follows chapter 3.4.2.2.4
General	The comparisons between ISO 20022 (XML) and ISO 8583 are excellent but should be published in separate document.
General	It should be noted that the technical possibility “e-commerce with a certified home-based/card-holder controlled card reader” is not covered here.
General	It should be noted that settlement is out of scope of this volume.
General	It should be noted that signature pads are out of scope of this volume.
General	Sometimes, the layout of titles seems not to be perfect (e.g. page 60).
Page 16	There is a typo: “environments”
Page 36	Spell out mail order and telephone order (like in page 39)
3.4.1.1 Req C4	Offline-PIN Clear Text should be marked to be phased out.
3.4.1.1 Req C5	SDA should be marked to be phased out.
3.4.1.2 Req C7 and C8	<b>The possibility for a “Dynamic CSC” should be included, e.g., a dynamic Card Security Code, that is sent by SMS to the card holder’s mobile phone (similar to the well established mobile TAN application for online-banking).</b>
Req T8	Cancellation on unattended POIs should be allowed, e.g. if the display is unreadable or if the petrol pump is not working
Req. T23	<b>The complete wording to this important topic should be within the text, not “hidden” in the subtext. Also the title, specific paragraph and date of the referred documents should be mentioned.</b>  <b>As mentioned before, this controversial topic should be discussed with market participants and competition authorities. The goal should be to avoid “multiple terminals” at a merchant POS location (due to a not-merchant oriented application selection within a terminal).</b>  <b>The current practices in Greece and Turkey should be avoided!</b>
Req T33	<b>Why shall the application not support PIN bypass at the choice of the issuer?</b>
Req T34	A common functional application should be mentioned for clarification (“e.g. tip function”).
Req T85	Why shall unattended POIs not be able to cancel approved pre-authorizations?



	(e.g. fuel pump defunct at a gas station?)
Req T86	Is a card-present pre-authorization process only possible with again a card-present pre-authorization – does this fit to the hotel business? <b>Please check this chapter with the hotel associations and the petrol associations!</b>
Req T 110:	CSC entry, especially dynamic CSC, should be also possible. Also it should be noted that use of the possibility “e-commerce with a certified home-based/card-holder controlled card reader” is possible but not covered here.
Req T120	The sentence seems to be unclear or incomplete: “For transaction initialisation the POI shall always display a message to the cardholder according the contents of which will depend on the selected Card Service.”
Req T144:	Referral should be allowed in Mail Order.
Req T153:	In remote payment the availability of goods can be proofed later, so that the POI is not able to nullify the transaction. The cardholder has to be informed using a second channel.
Req T158	Which situation is described? Processing after authorisation? Normally the Card Security Code is defined for use in MOTO.
5.3.2	An additional security option for “EPC Plus” might be a “PCI DSS capsuled terminal” where the merchant has no access to any magnetic stripe card data – the management of the terminal is outsourced to a “PCI DSS compliant third party”. <b>This refers to the bullet point “Finally Europe is not an island” in the introduction of 2.1. (page 7).</b> More information on this subject is available on request.
6.3.	<b>The requirements from PCI SSC and CAS should be aligned. A double certification “PCI PST” and “CC” should be avoided at any case!</b>
6.3. cont.	note on page 147 bottom: who is PCICo?
6.3. cont.	<b>The proper governance of the “Certification Management Body” is very important. All stakeholders (including Commerce and possibly their Service Providers) should be included and the competition authorities should have an observer status!</b>
7 Annexes	<b>The definitions are very good in the text. But it should be checked, that at least all words of chapter 3.2 (functional scope) are covered !</b>  <b>For improved flexibility, the other parts of the annex (especially 7.2 and part 2 ) should be in separate documents.</b>