Australian Banking Association

6 April 2023

Submitted on Thursday, 6 April 2023 via: Consumer Data Standards Australia - GitHub site

Dear @CDR-API-Stream

ABA Response to Decision Proposal 288 – Non-Functional Requirements

The Australian Banking Association (**ABA**) welcomes the opportunity to respond on behalf of our Members regarding DP 288 Non-Functional Requirements.

The ABA has met with Members to discuss DP 288 in more detail and provides the following feedback.

A point raised by Members centred on Dynamic Client Registration (DCR) Response Time - NFR. Members noted that current CD Standards (**the Standards**) response times for DCR can prove challenging to comply with, given the additional latency taken by the Accredited Data Recipient's (**ADRs**) to undertake the registration request JWT validation required by the Standards. This additional latency time which Data Holders (**DH**) rely on, in relation ADRs to **outbound connection whitelisting** is not split out from times noted in the Standards. We propose that the DSB further reconsiders amending response times to reflect this. As a point of reference, we include a link to last year's Dynamic Client Registration Response Time NFR #409.

We note DP 288 confirms that the DCR will not be subject to change but reserved for a future direction of the **Register Standards.** We ask the DSB to reconsider our Members' position to address their concerns on this point as part of the development requirements in the DP 288.

Equally, we do thank the DSB for providing clarity on the origins of the six new Consent Metrics (new authorisations) introduced into DP 288. Where the DSB explained that the ACCC requested these specific new Consent Metrics, so the ACCC can determine where customers are **dropping off in the consent flow**, and whether this is occurring at the ADR or DH ends.

We propose an open discussion or workshop with the ACCC regarding their request for additional consent metrics as a way to understand and improve consent drop off rates. The cost and effort to add these metrics, when aggregated across all DHs is significant. We propose that a small number of DHs that between them cover most consent flow types (basically looking at different OTP delivery mechanisms), to volunteer and provide the metrics requested on a one-off basis as input for a study into improvement in consent flow UX, which is presumably what the ACCC want the metrics for in the first place. This would lead to a faster outcome and be cheaper for not only all DHs but also for the volunteers (as they would not be extending the Metrics API, only collating the data on a one-off basis). We also note that consent flow is likely to change radically because of Action Initiation and the introduction of FAPI 2.0 and RAR.

Should the above volunteer proposal not be accepted, some Members have raised comment on the DP 288 section around **Implementation Considerations,** which includes the six new Consent Metrics. We note that the DSB acknowledged that it was prepared to **ramp up the implementation schedule over an extended period**. An initial proposal raised by the DSB was for five years being a potential period of implementation. The ABA welcomes this proposal by the DSB, to allow our Members to better resource and budget accordingly for these, and other priorities, including those planned for future CDR implementation (e.g., Action Initiation and Non-Bank Lending).

We would also ask the DSB further considers how it would prefer to update the CX journey negative path. At any point along the customer journey, the customer can decide to cancel and there can be multiple reasons why (regardless of whether the customer is still at ADR side or DH side). Recognising it is not only about the customer hitting a technical issue and can't continue with the journey. Ideally at the point of customer-initiated cancellation, data should be collected as to why the customer decides to cancel and it should be a "standardised" set of reasons Members can all report on. Currently (incl., ADR/DH) this data is not collected from customer when they cancel, as it is deemed as introducing friction when it is not on the DSB's CX flow.

We generally understand the DSB's proposal to balance the requirement on TPS ceiling obligations tied to the **number of consents** held by each bank. Meaning this is intended by the DSB to be a fairer allocation of investment across individual banks. As opposed to setting a fixed figure which some smaller Members may result in excessive systems costs based on TPS ceiling measure which banks are not likely to reach.

Members have expressed challenges on TPS thresholds around provisioning for peak times. Members have suggested further workshops be facilitated by the ACCC and DSB on how to address this matter on TPS and response time concerns and achieve a fair and reasonable model across all industries and emerging areas like Action Initiation. Members believed this approach could better serve reaching a resolution than direct feedback to a DP.

We would rather have a staged lift in TPS that is tied to a realistic industry consensus forecast. If the increase is staged over a number of years, we would also like a mechanism to periodically revise the required TPS as more data becomes available. Alternatively, if a formulaic approach tied to consents is taken, we would expect that the formula be deployed in a manner that gives Members enough time to budget for and implement system uplifts to cater for increased TPS NFRs, including systems changes for third party service providers.

We also propose that demand management is considered. For example, demand from ADRs could be spread across 24 hours, and not 3 hours in the early morning. This could be enforced through hourly quotas. Another consideration is restricting the number of times that slow moving data is queried. If a given data set is only updated daily, then this could be flagged with a new metadata field that the ADRs would have to respect and only request that data once a day.

In conclusion, we note DP 288 raises challenges for smaller DHs around TPS and consents, with a few options raised by the DSB to remediate under the heading, **Scaling for large DHs.** One proposal includes, **'increase in the site wide TPS and Session Count NFRs'.** Some Members have requested evidenced based data that the DSB sees why, or foresees in the ecosystem to warrant a change, and the types of changes being proposed by the DSB.

Further discussions or workshops with the ACCC and the DSB to discuss these NFRs and other appropriate matters to understand how this potential proposal could be applied efficiently, would benefit our Members. Given if it were applied by the DSB, to accommodate for a rise in TPS ceiling thresholds, this would likely result in significant investment to affected ABA Members.

We thank the DSB again for the opportunity to respond on behalf of our Members, as we are equally thankful for the DSB extending our response date by a week.

We look forward to continuing our engagement and thank the DSB for its support in these matters.

Yours sincerely

Australian Banking Association