

GD 3 Compliance Template

Purpose

This template comprises a set of forms and associated guidance to assist the operators of regulated payment systems in completing the compliance reports that are required by the PSR General Directions on Access and Governance.

Operator	GD3
CUP	✓
JCB	✓
AMEX	✓
LINK	✓
MASTERCARD	✓
VISA	✓
Diners	✓

Operators must comply with our directions and also report annually on how they're achieving compliance. In doing this, it will be important to reflect on the principles-based nature of the obligations that are in place.

This key evidence will show how you have responded to these rules over the 12-month period from 1 October to 30 September.

Confidential information


We recognise you deal with confidential information, some of which is relevant to the reporting arrangements. This information can be provided in one of the confidential annexes which are set out as part of this template. Information not contained within the annexes will not be treated as confidential and may be published in the course of our reporting on operators' compliance with these general directions.

General Directions: Compliance Report Template

Supporting documents

In completing the forms in this template you should reference documents to evidence your descriptions (i.e. Web links to public documents; sections where relevant). If any supporting documents are confidential they should be provided to us separately and marked up as confidential.

Contacting us

We hope the forms are clear, but if you have any questions please feel free to contact 

Form B - General Direction 3

Please complete the form below. The **main headings** relate to the reporting requirements of general direction 3. The sub-headings provide you with guidance on the information that we would like you to provide in order to meet the reporting requirements.

GD3.3.3 Self-assessment on compliance of access requirements contained in regulation 103 of the Payment Services Regulations 2017.	
<p>GD3.3.3b Please state whether you have or have not complied with the obligation contained in regulation 103 of the PSRs 2017.</p> <p>Please include a summary relevant to your response.</p>	<p><i>Suggested limit: 500 Words</i></p> <p>American Express considers that it has complied with the obligation contained in regulation 103 of the PSRs 2017 during the period from 1 October 2019 to 30 September 2020.</p>
<p>GD3.3.3c1 Please highlight all occasions over the past 12-months where access has been withdrawn or modified for an existing service user.</p>	<p><i>Suggested limit: 300 Words</i></p> <p>As a result of the termination of American Express' licensing agreements, these operations have been wound down in the UK. During the reporting period, only one former licensing partner in the UK had access to the network. At this time, the licensee was in the final stages of winding down its licensing operation in the UK. The last of these cards was removed from the network on 15 November 2019. Access has not been withdrawn or modified for any other party in the UK.</p>
GD3.3.3 Details of expressions of interest in potentially securing direct access or direct technical access and the response to, and outcome of, such expression of interest.	
<p>GD3.3.3c2 all occasions in the relevant 12-month period when another party had expressed interest in potentially securing direct</p>	<p><i>Complete the following table. Data should be correct as at 30 September.</i></p> <p>American Express does not operate a membership business model or has members as envisaged in the table below. In addition, as referred to above, American Express has exited its licensing business.</p>

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<p>access or direct technical access to the payment system</p>	<table border="1"> <thead> <tr> <th data-bbox="683 225 1021 292"><i>Expressions of interest</i></th> <th data-bbox="1021 225 1359 292"><i>Signed letters of intent</i></th> <th data-bbox="1359 225 1697 292"><i>New members during reporting period</i></th> <th data-bbox="1697 225 2033 292"><i>No. of participants</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="683 292 1021 327">N/A</td> <td data-bbox="1021 292 1359 327">N/A</td> <td data-bbox="1359 292 1697 327">N/A</td> <td data-bbox="1697 292 2033 327">N/A</td> </tr> </tbody> </table>	<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>	N/A	N/A	N/A	N/A
<i>Expressions of interest</i>	<i>Signed letters of intent</i>	<i>New members during reporting period</i>	<i>No. of participants</i>						
N/A	N/A	N/A	N/A						
<p>GD3.3.3c3 the initial response to the expression of interest, and the outcome at the conclusion of the process</p>	<p><u><i>Suggested limit: 300 Words</i></u></p> <p>Not applicable.</p> <p><i>Please complete any confidential information in the table at confidential annex 1. This information will not be published.</i></p>								
<p>GD3.3.3 Details of any enquiries or objections regarding potential changes to access requirements and details of the response and outcome.</p>									
<p>GD3.3.3d details of all occasions in the relevant 12-month period where you engaged with, and considered the views of PSPs and other interested parties on the operation and effectiveness of your access requirements</p>	<p><u><i>Suggested Limit: 300 Words</i></u></p> <p>American Express – both in its capacity as a network and an acquirer – engages with prospects and agents throughout the full lifecycle of the relationship (including prior to onboarding), which includes addressing the basic technical and operational requirements that agents are expected to comply with in order to have access to the technical infrastructure of the network. Both prospective and current agents have the opportunity to express their views on the operation and effectiveness of these requirements.</p> <p><i>Please complete any confidential information in the table at confidential annex 2. This information will not be published.</i></p>								

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GD3.3.3 Details of any anticipated review, or engagement with <i>payment service providers</i> and other interested parties in relation to <i>access requirements</i>.	
GD3.3.3e details of any anticipated review of your access requirements, or any engagement with service-users and other interested parties, that you plan to take over the following 12-month period	<u><i>Suggested Limit: 300 Words</i></u> American Express' network policies are maintained and reviewed on a regular basis. There are currently no known changes planned to the access requirements over the coming 12-month period.
GD3.3.3 Details of any anticipated future developments, material updates or changes to <i>access requirements</i>.	
GD3.3.3f details of any anticipated future developments that you may require or material updates or changes to your access requirements	<u><i>Suggested Limit: 300 Words</i></u> American Express is not at this stage aware of any anticipated future developments that may require material changes or updates to the network access requirements.