Consultation Questionnaire

This template is intended to help stakeholders respond to the questions set out in our consultation document and in its supporting papers.

Responses should be emailed to us at Forum@psr.org.uk in PDF format by no later than 22 September 2017. Any questions about our consultation can also be sent to Forum@psr.org.uk

Whilst we welcome feedback from any participant on any question, not all questions in this consultation will be relevant to the wide range of stakeholders in the Payments Community. We have sign posted the questions to clarify which are most relevant for your organisations, and where we would most value your feedback. Thank you in advance for your contribution to this consultation process.

Basic Details

Consultation title	NPA
Name of respondent	Matt Bradney
Contact details / job title	Managing Director
Representing (self or organisation/s)	The Ely Fitness Company Ltd
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Responding to the consultation and publication of responses

Subject to express requests for confidentiality, please note that we will publish views or submissions in full or in part. In responding, we therefore ask you to minimise elements of your submissions which you want to be treated as confidential. Where you do submit both confidential and non-confidential material, you should submit a nonconfidential version, which you consent for us to publish, marked 'for publication' and another version marked 'confidential'.

In responding to this consultation, you are sharing your response with the Forum secretariat (1). Confidential information provided in these circumstances is confidential within the meaning of FSBRA and it is a criminal offence to disclose it without requisite authority (2).

Notes:

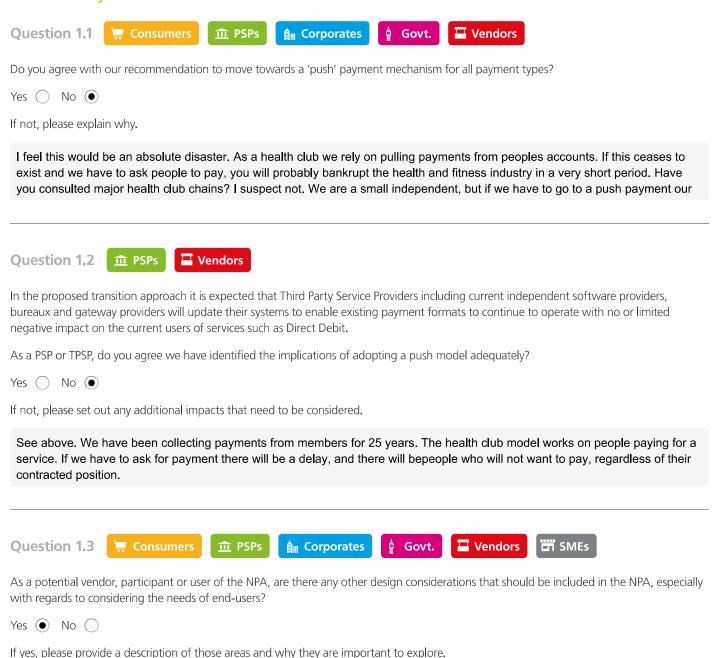
- (1) The Forum secretariat work for the Payment Systems Regulator Limited, 'the PSR', and are considered primary recipients for the purposes of the Financial Services (Banking Reform) Act 2013 (FSBRA).
- (2) The PSR has the power to disclose confidential information in certain circumstances for the purposes of facilitating its functions and may impose conditions on the use of that information.

Declaration

I confirm that our response supplied with this cover sheet is a formal consultation response that the Forum can publish, unless it is clearly marked 'confidential'.

Matt Bradney

1.0 A New Payments Architecture



It seems that little consideration has been given to small SMEs like us. We use a third party to collect our money for us. The

sytem appears to be designed for huge companies and the consumer. Where do we sit in the process?

Question 2.5 Corporates Govt. Govt.
We envisage payees stipulating a payment period during which the payer will be required to make the payment. As a payee, how do you think this payment period might be applied within your organisation?
My customers pay monthly. They pay for each calendar month, so the payment period must be as short as possible, to stop unpaid usage.
Question 2.6 Corporates Govt. SMEs
Request to Pay will offer payers flexibility over payment time as well as amount and method. As a payee:
a. Does your business model support offering payment plans and the ability for payers to spread their payments?
Yes ○ No ●
If so, please provide more details as to how these plans are offered, their conditions and to which customers.
b. Do you have a predominant payment method used by your payers?
Yes No
If so, what percentage of customers use it?
90% direct debit
c. Do you offer your payers a choice of payment methods?
Yes No No
If yes, what determines how much choice you offer? If not, what are the barriers preventing you from doing this?
Nothing determines what choice other than cost of collection.
d. Are there any incentives to use one payment method over another?
Yes No
If so, what is the rationale?

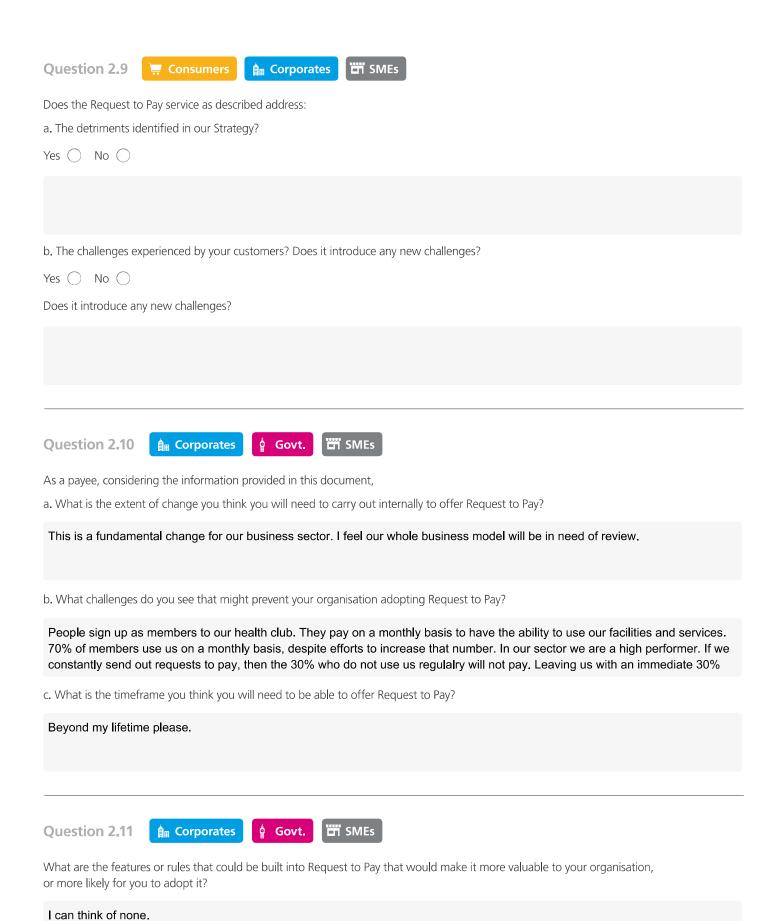
If a customer pays up front through either card, cash or bank transfer then they recieve a discount. We do not priortise any for of

payment, as we need to keep barriers to payment at a minimum.

Yes

No

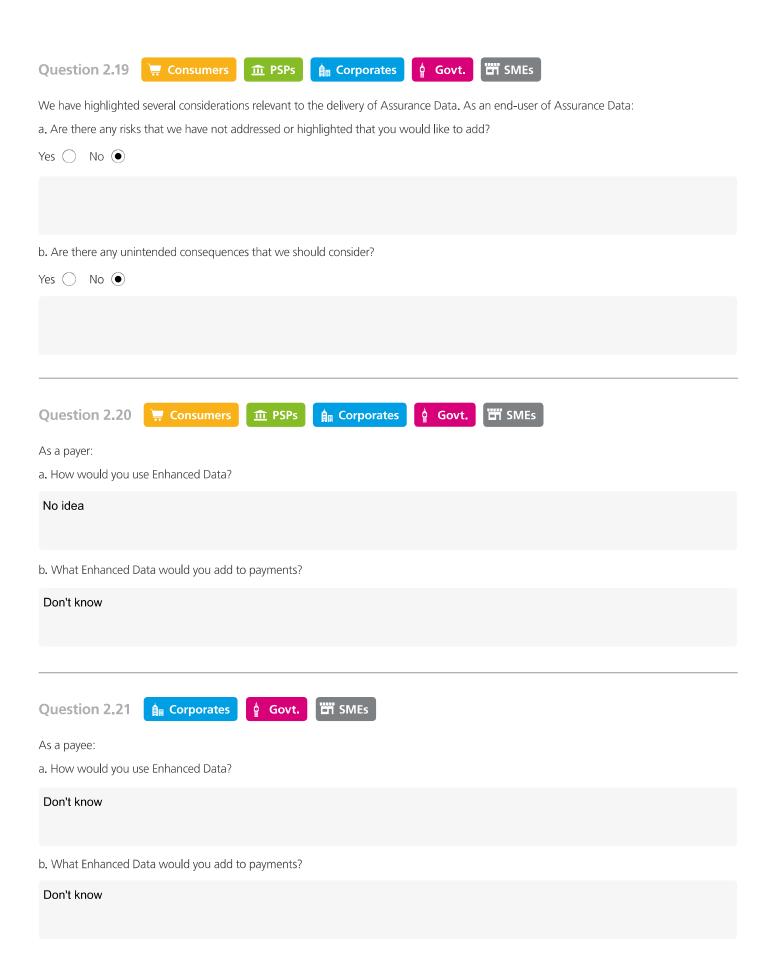
In the real world this will result in far more non payers than Direct Debit.

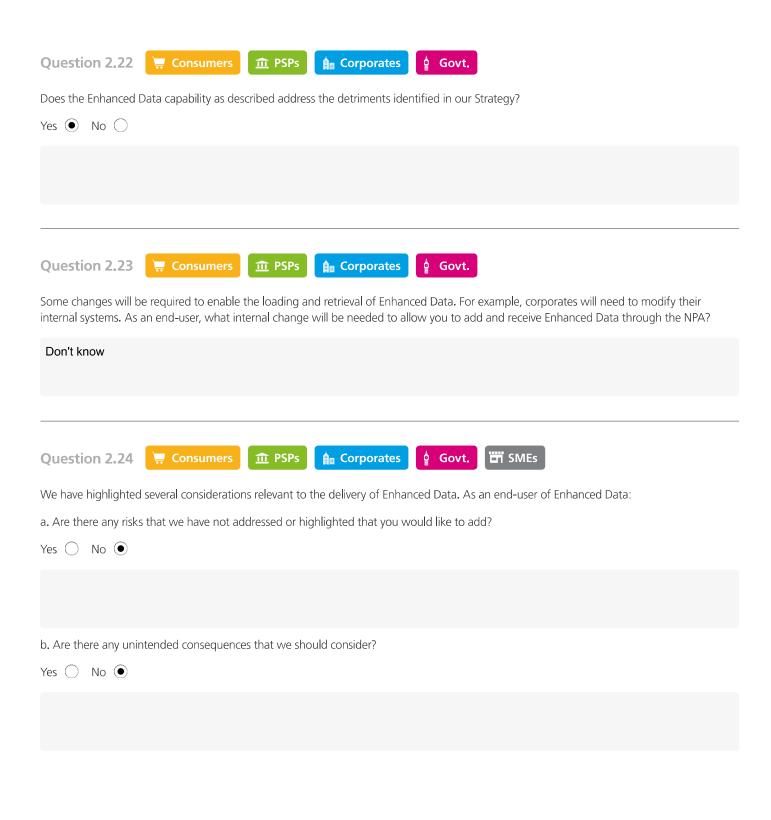


If so, please contact us as soon as convenient through the Forum website so we can get you involved.

Question 2.14
As a PSP:
Do you currently offer real-time balance information to your clients?
Yes No
What information do you offer them? If not, what are the constraints?
Sort of. Members pay monthly, so there is only ever 1 month of arrears.
Question 2.15 — Consumers — PSPs — Corporates — SMEs
We have presented two CoP response approaches (Approach 1 and Approach 2).
a. As a payer, what would be your preferred approach? Why?
Approach 1. It just seems simpler
b. As a PSP, what would be your preferred approach? Why?
c. As a regulator,
I. What are applicable considerations that must be made for each approach?
II. What safeguards must be put in place for each approach?

Question 2.16
As a PSP:
a. Would you be able to offer CoP as described to your customers? Yes No No
b. What is the extent of change that you would need to carry out internally to offer CoP?
Question 2.17
The successful delivery of CoP is largely dependent on universal acceptance by all PSPs to provide payee information. As a PSP:
a. Would you participate in a CoP service?
Yes No No
b. Are there any constraints that would hinder you providing this service?
Yes O No O
Question 2.18
The NPA will fully support the functionality for PSPs to provide payment status and tracking.
a. As a PSP, what is the extent of change you think you will need to carry out internally to offer Payments Status Tracking?
b. What challenges do you see that might prevent your organisation adopting Payments Status Tracking?



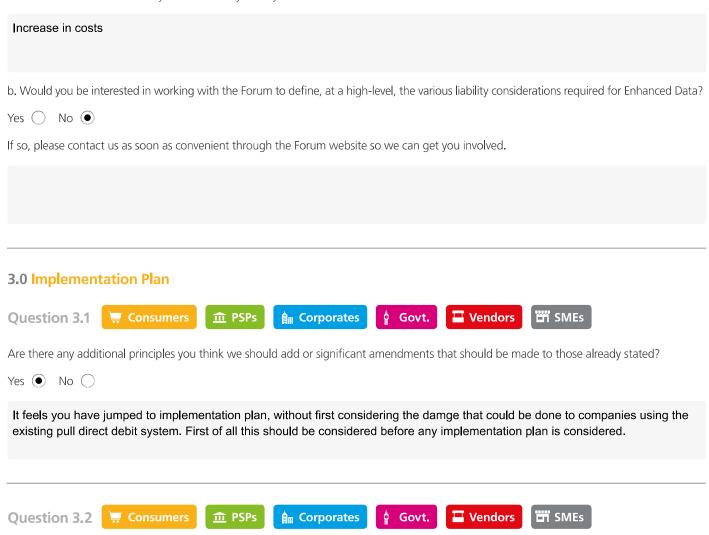


Yes (No ()



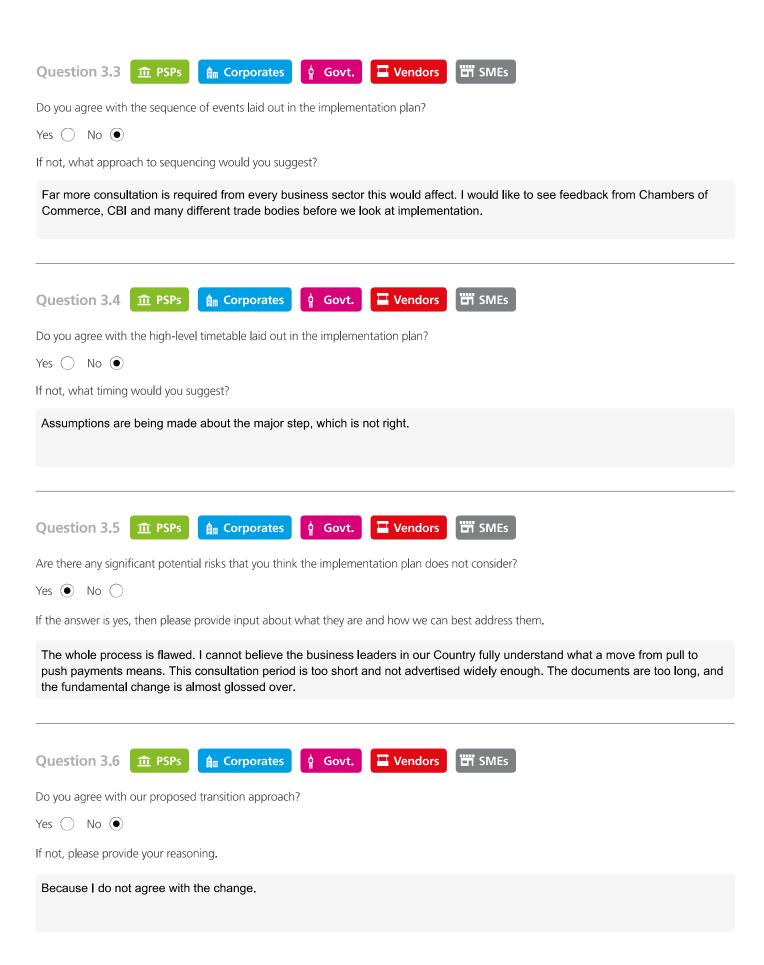
We recognise that additional work needs to be done in identifying safeguards including liability considerations associated with Enhanced Data. As an end-user of Enhanced Data:

a. What are some of the liability concerns that you may have?



The implementation plan assumes that you have the right idea in scrapping pull payments - it is not the right idea, therefor the plan should be redrawn when you do have the right idea.

Are there any additional assumptions you think we should add or significant amendments that should be made to those already stated?



4.0 Cost Benefit Analysis of the NPA

Question 4.1
Are there any material quantifiable benefits that have not been included?
Yes ○ No ●
If so, please provide details.
Question 4.2
Do you agree with the cost assumptions with regards to the NPA and each of the overlay services (Request to Pay, Enhanced Data, Assurance Data)?
Yes ○ No ●
If not, please state your reasons and, if possible, suggest alternatives analysis.
Cost assumptions for whom?
Question 4.3
Do you agree with our description of the alternative minimum upgrade?
Yes ○ No ●
If not, please explain your reasoning.

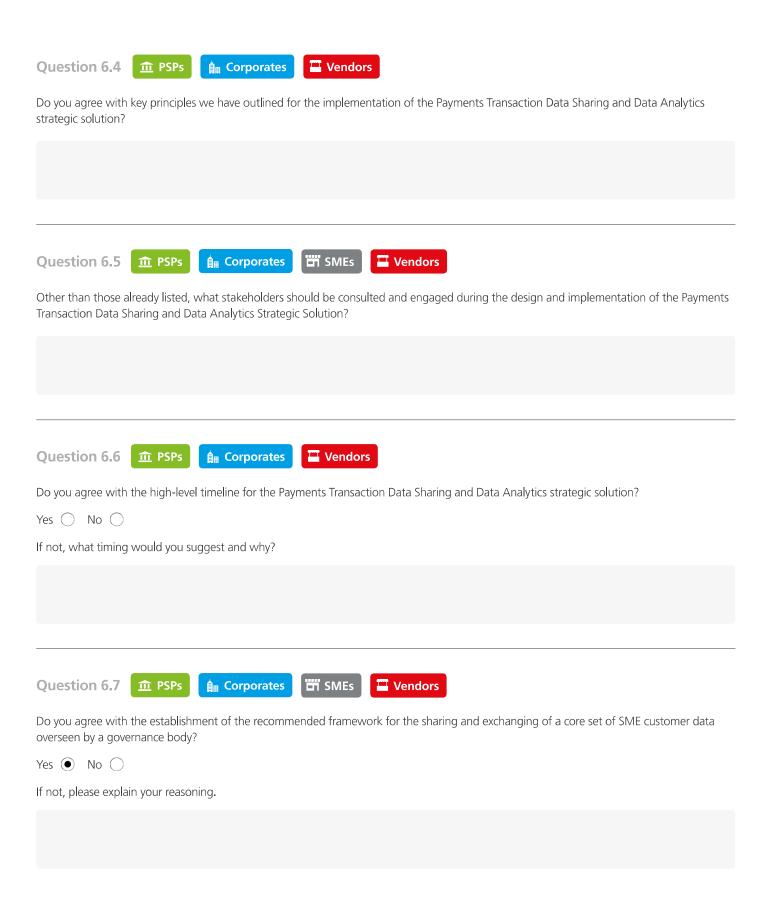
5.0 NPA Commercial Approach and Economic Models

Question 5.1
Does our competition framework adequately capture the types of competition that may exist in payments?
Yes O No O
Please explain.
Question 5.2
Do you agree with the NPA competition categories described? If not, please explain why.
Yes O No O
Question 5.3 Vendors
Does our framework capture the dynamic roles the NPSO may play in the market?
Yes O No O
Question 5.4
Are there any other important criteria that we should use to assess the funding options we have identified?
Yes O No O

Question 5.5 💆 Investors
Do you agree with our NPA competition assessment? If not, please explain why. Yes No
Question 5.6
Do you agree with our assessment of End-User Needs Solutions? If not, please explain why.
Yes O No O
Question 5.7
Do you agree with our list of funding stakeholders? If not, please explain why.
Yes O No O
Question 5.8
Are there other significant sources of funding or types of funding instruments the NSPO could secure that have not been described? If not please explain why.
Yes No No

6.0 Improving Trust in Payments

Question 6.1
Do you agree with the outlined participant categories identified for the Payments Transaction Data Sharing and Data Analytics strategic solution?
Yes O No O
Are there other categories that should be considered for inclusion?
Yes O No O
Please explain your response.
Question 6.2
What is your opinion on the role non-payments industry participants should have as part of the Payments Transaction Data Sharing and Data Analytics strategic solution? (This could include Government, Law Enforcement, or others). If appropriate, please outline usage of the system, provision of data to the system, and legal considerations for participation.
Question 6.3
Do you agree with the potential use cases outlined for the Payments Transaction Data Sharing and Data Analytics strategic solution?
Yes O No O
If not, please provide your reasoning. Please indicate if there are other potential uses for the system that should be considered.



n PSPs **Question 6.8 Corporates** We are keen to get your input on the benefits provided by the framework. a. Do you agree that the focus on sharing a core set of SME customer data is beneficial for the KYC processes in your organisation? Yes O No O If not, please explain your reasoning. b. Which other business activities could be supported by / benefit from the described sharing and exchanging a core set of SME customer data? n PSPs **≜** Corporates SMEs Question 6.9 Vendors Do you agree that the topics covered by the standards will provide sufficient guidance in order to implement the data sharing framework without being too prescriptive? Yes No Are there additional topics you believe should be included? Question 6.10 n PSPs **≜** Corporates SMEs Vendors To engender trust in the sharing and exchanging of a core set of SME customer data, are there other responsibilities you would expect the governance body to have oversight over?

Question 6.15
Are the arguments put forward compelling enough to encourage net data providers to engage?
Yes No No
If not, please provide examples of what else would be required to make them participate.
Question 6.16 Corporates
Do you see other advantages or challenges for net data consumers that were not listed above?
Yes O No O
Please explain your answer.
Question 6.17
Do you agree with the high-level implementation timeline for the Trusted KYC Data Sharing solution?
Yes O No O
If not, what timing would you suggest and why?
Question 6.18
Are there other initiatives with a similar focus that should be considered in order to deliver the Trusted KYC Data Sharing solution?

Save Questionnaire*

^{*} Please save your questionnaire and email to us at Forum@psr.org.uk in PDF format by no later than 22 September 2017.