equensWorldline

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Date
21 September 2017
Subject
eW PSF NPA July 2017 Consultation Response

Your reference PSF NPA July 2017

Our reference UK DA 210917

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Dear Sir / Madam,

Thank you for the opportunity to respond to your July 2017 consultation on the Payments Strategy Forum's proposed New Payments Architecture (NPA).

Enclosed is equensWorldline completed consultation questionnaire answering the consultation questions asked on the proposed NPA. We would though, as well as providing these structured question responses, also like to make the following strategic observations on the proposed NPA:

- 1. We believe the move to a consistent underlying push payment architecture, and the opportunity it provides for the introduction of both greater consistency and value across the different existing payment types, is the right strategy for the UK payments infrastructure.
- 2. Although moving to a single unified payments platform is the most economic way of delivering the underlying push payment architecture, it will be critical that any unified payments platform is operated, on behalf of the NPSO, by an experienced critical national payments infrastructure provider to ensure the unified payments platform's operation is both fully resilient and secure.

In addition, we would ask the PSF to note our response to Question 1.3 that the NPA, as detailed, does not describe how it will support consumers and businesses, who have switched PSP, in accessing their payments data. As such, the NPA might introduce barriers to switching; because consumers and businesses who want to switch will want to ensure they can access all of their data through all of the 'open banking' solutions they use.

If there is anything in either the equensWorldline consultation response or the additional points raised in this letter which you would like to explore in more detail, please do not hesitate in contacting me.

Yours faithfully,

MML

Dave Allen

Managing Director UK branch office

equensWorldline

Enclosure(s)
PSF NPA July 2017 Consultation Questionnaire (eW resppnse) Final.pdf