

NOTAT

The Danish Financial Supervisory Authority

TEMPLATES FOR REPORTING ERRORS, BREAKDOWNS AND PERCEIVED DEFICIENCIES IN PSD₂ APIs

INSTRUCTIONS

The following templates are used to address errors, breakdowns and perceived deficiencies in the use of the dedicated interfaces under PSD2 (hereafter PSD2 APIs) in the communication between account servicing payment service providers (ASPSPs) and providers of payment initiation services and account information services, collectively referred to as third-party service providers (TPPs). It is up to the individual ASPSP to decide how the template should be used in practice, for example, whether it should be incorporated as a form on the developer portal, sent as an email or something else.

The templates are sorted by the severity rating of the communication, meaning that breakdowns are the most severe type of template while queries are the least severe. The severity of any potential issues communicated via the templates should also be clearly communicated in the general description field.

In order not to dilute the seriousness of the highest severity templates, you should always strive to choose the lowest reasonable severity template for your inquiries. Also, as far as possible, inquiries should only be about one individual issue per inquiry.

In the event of a breakdown of an essential supplier, for example, MitID, a TPP should always check the operational status on the supplier's own website and assess whether contacting the ASPSP is still necessary or whether the breakdown can be attributed to the essential supplier.

The "Request ID" field is a field with a unique value that uniquely identifies a specific call from one system to another, usually implemented as a header in an HTTP call. ASPSPs are encouraged to specify in the documentation of their PSD2 API which field should be used for queries.

1. BREAKDOWNS

Examples below include, but are not limited to:

- Network outages
- Application breakdowns at ASPSP
- Breakdown in the bank's implementation of SCA solutions
- Breakdown at an essential supplier (for example, MitID)
- Unjustified rejection of all requests (misconfiguration of security systems, failure of certificate-based access control)
- Incidents detected immediately after non-communicated Breaking Changes have been rolled out or a new feature was enabled in the production environment
- Specific users get an error while running a process
- Errors related to new certificates being used

FIELDS

1. Time stamp with time zone [DK: Tidsstempel med tidszone]
2. Environment (production or testing) [DK: Miljø (produktion eller test)]
3. Type (technical problem or business logic)
4. Description
5. Metrics (assessment of scope in percentage of relevant metrics that fail - this could be calls, logins, users, payments, number of TPPs it fails for, for a TSP, or the like)
6. Request ID
7. Absolute URL
8. Anonymised request and response dump

2. PERCEIVED DEFICIENCIES

Doubts as to whether an ASPSP's implementation of the regulation around PSD2 APIs is deficient or flawed. Examples below include, but are not limited to:

- Repeatedly absent or late notification of breaking changes at a high level
- Inadequate, unreasonably delayed or completely absent responses from ASPSPs
- Missing information fields that are otherwise found in ASPSP's own interfaces
- There are requirements for more information fields to be filled in when creating payments compared to ASPSP's own interfaces
- Missing login methods that are otherwise found in ASPSP's own interfaces
- Requirement to implement more security mechanisms than ASPSP's own interfaces for the same functionality
- Disputes about whether technical requirements by the ASPSP beyond the statutory ones are reasonable

FIELDS

1. Time of day
2. Environment (production or testing) [DK: Environment (production or test)]
3. Type (poor uptime, lack of support or obstacle)
4. Description
5. Reference to relevant sections of the applicable legislation

3. INQUIRIES

Inquiries that are not covered by the other two types. Examples below include, but are not limited to:

- Errors during implementation and testing phase
- Questions about upcoming changes
- Insufficient information or functionality in the ASPSP sandbox environment of their PSD2 API that does not reasonably reflect the production environment

FIELDS

1. Time of day
2. Description