



EUROPEAN CENTRAL BANK
EUROSYSTEM

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Institution/Company

Austrian Federal Economic Chamber, Division Bank and Insurance

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Please tick here if you do not wish your personal data to be published.

General comments

The amendments required for this detailed reporting are complex and cost-intensive. There are no relations to the usefulness of these reports. We therefore think that the current reporting and reporting-intervall are enough.

If the reporting will be expanded, a sufficient lead time must be observed.

For an implementation in time, it is necessary to have enough time in advance to analyse and implement the it-implementation. 1 year is too short because the NCB also has to create the specifications.

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:	7 May 2020
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ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Regulation	Article 8	1	5	Amendment	Due to the corona crisis and the far-reaching implementation in IT, we are calling for a postponement of the first report by at least 1 year	generell topic of all banks	, WKÖ, BSBV	Publish
2	Annex I	Part 1	5a Fraudulent payment transaction	8	Amendment	The reporting based on the EBA guidelines appears sufficient. Every bank is obliged to largely identify and avoid FRAUD cases in advance.	The reporting of FRAUD cases in the required depth requires complex manual processes	, WKÖ, BSBV	Publish
3								, WKÖ, BSBV	Publish
4	Annex III	Table 1		45	Deletion	In Table 1 "overnight deposits" only 1 figure will be delivered. Background: All our accounts are overnight transactions that are "internet / PC-linked" and all accounts are "transferable without significant delay, restriction or penalty". Thus, from our point of view only the registration of the number of savings accounts will be reported.	In case more financial institutes handle it in this way, we would be in favor to reduce the level of detail for a better overview	, WKÖ, BSBV	Publish
5	Annex III	Table 1		45	Clarification	Only private payment accounts should be taken into account here, or commercial and securities clearing account (WP- Verrechnungskonto) as well?	A clarification will support the industry in correctly reporting figures as intended and will prevent multiple inquiries for clarification with the relevant authorities	, WKÖ, BSBV	Publish

6	Annex III	Table 1		45	Clarification	What is the concrete definition of Number of e-money accounts. Only Online-Banking?	There are a number of clarifications around the term "e-money" missing. In light of the revised regulation on payments statistic, these questions were already formulated by an industry group and published here: https://www.abe-eba.eu/media/azure/production/2334/20200121_open_questions_around_e-money_definition_v10.pdf	, WKÖ, BSBV	Publish
7	Annex III	Table 1		45	Clarification	Outstanding value on e-money storages issued ist only for online Banking?	There are a number of clarifications around the term "e-money" missing. In light of the revised regulation on payments statistic, these questions were already formulated by an industry group and published here: https://www.abe-eba.eu/media/azure/production/2334/20200121_open_questions_around_e-money_definition_v10.pdf	, WKÖ, BSBV	Publish
8	Annex III	Table 1		45	Clarification	Electronic money institutions - does it affect only online banks? Is it to be reported as it deals with e-money institutions	There are a number of clarifications around the term "e-money" missing. In light of the revised regulation on payments statistic, these questions were already formulated by an industry group and published here: https://www.abe-eba.eu/media/azure/production/2334/20200121_open_questions_around_e-money_definition_v10.pdf	, WKÖ, BSBV	Publish
9	Annex III	Table 1		45	Clarification	Please clarify what is meant by "other payment service providers". What is meant by "payment institution"? If an ASPSP is acting as (PSD2) PISP and/or AISP, is this to be reported under this point?	A clarification will support the industry in correctly reporting figures as intended and will prevent multiple inquiries for clarification with the relevant authorities	, WKÖ, BSBV	Publish
10	Annex III	Table 4a		50	Clarification	Please provide a definition of the term "Other Payments Services"	A clarification will support the industry in correctly reporting figures as intended and will prevent multiple inquiries for clarification with the relevant authorities	, WKÖ, BSBV	Publish
11	Annex III	Table 7: Participacion in selected payment systems		67	Clarification	Requirement for Table 7 is not fully clear to us. What should be reported under categories "central bank" and "public administration"?	A clarification will support the industry in correctly reporting figures as intended and will prevent multiple inquiries for clarification with the relevant authorities	, WKÖ, BSBV	Publish