



Australian Banking Association

21 June 2019

Mr James Bligh
CSIRO Data 61
By email: cdr-data61@csiro.au

Dear James,

Re: 21 June 2019 submission on the v0.9.3 standards DRAFT

The Australian Banking Association (**ABA**) welcomes the opportunity to comment on the May 2019 Working Draft of the Consumer Data Standards. The ABA and its members have appreciated the consultative approach of Data61 in the development of the standards.

With the active participation of 24 member banks in Australia, the Australian Banking Association provides analysis, advice and advocacy for the banking industry and contributes to the development of public policy on banking and other financial services.

The ABA works with government, regulators and other stakeholders to improve public awareness and understanding of the industry's contribution to the economy and community. It strives to ensure Australia's banking customers continue to benefit from a stable, competitive and accessible banking industry.

In considering our response to the May standards release we have been mindful of the need to establish certainty as soon as possible in order to move forward confidently with implementation. We accept that all parties are better off with a workable solution now rather than a perfect solution an indeterminate distance into the future. Hence, we have approached this submission in the spirit of pragmatic compromise.

That said, we note that attempts to achieve consensus on specific issues frequently founded on interlinked uncertainties. For example, the appropriateness of aspects of the InfoSec Profile can be contingent upon the authorisation/re-authorisation model, which in turn is at least partly contingent on the CX Guidelines. There are similar dependencies relating to the design and capabilities of the Registry.

Our specific feedback is as follows:

Authorisation/consent flow

We note the direction of the authorisation and consent flow is undergoing further CX testing and analysis. Whilst the industry does not have consensus on the question of the authorisation/consent flow we do agree on the following principles:

- Principle 1: the design of the authentication process in the scheme should allow for the proactive detection of fraudulent activity. (If there is a redirect approach, the authentication process should have adequate security in line with current bank channel monitoring security practices).
- Principle 2: the authentication process should not require a consumer providing a banking credential to a third party.
- Principle 3: the user experience is important to the regime; however safe and secure data sharing should be the most important consideration.

We continue to highlight the significant effort which will be required for consumer re-education for heightened discernment relating to the use of their bank customer identification numbers and passwords. ABA members have undertaken significant education programmes over decades to help customers protect themselves against cyber-attacks on their banking accounts. Any of the various open banking customer experience options, by nature of commencing in a third party with initially unfamiliar steps, both i) will require customer re-education, and ii) also create potential risks to the current gold standard of banking security being only transacting within a single channel. The ABA notes the implementation of Open Banking will require significant investment in customer awareness, and this should be planned in the roll out.



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Re-authorisation

We note that it is difficult for us to propose a solution to re-authorisation while the choice of authorisation flow remains uncertain.

Consent object

We note that an ABA member has already made a detailed submission (refer to attachment) to Data61 regarding the definition of a consent object. The ABA members are collectively supportive of this submission in principle and look forward to refining the design details with Data61.

Our reasons for supporting the immediate inclusion of a Consent object have been extensively detailed on GitHub.

Dynamic client registration

At this point ABA members are broadly supportive of the immediate inclusion of dynamic client registration. We note that design work on the Register is still at an early stage and look forward to working collaboratively with Data 61 and the ACCC to ensure there is a highly-available registry and certificate authority and that the technical details are represented in the appropriate documentation.

Operating model

It is broadly expected that aspects of the standards will have to change, possibly significantly, in response to learnings emerging from the implementation and testing process. While a high-level operating model has been proposed by Data61 it remains unclear exactly how the backlog of issues will be managed. We recommend a transparent and democratic process where the CDR community could prioritise the backlog of issues to be resolved via GitHub.

In addition, we recommend that the operating model for both the Register and the Standards be consistent and overseen by a single entity (i.e. by Data61). If these tightly interrelated aspects of the CDR regime continue to evolve separately this will constitute a significant ongoing risk.

Consistency of the InfoSec profile, the API's and the CX guidelines

There is significant concern that the CX Guidelines may prove to be inconsistent with aspects of the InfoSec Profile and/or some API's. This presents a risk of re-work that is difficult to quantify or plan for. We would value guidance on the timeline and methodology proposed for resolving any such inconsistencies (see Operating Model above). Where there are significant changes due to CX requirements there needs to be the appropriate amount of compliance time for implementation.

Emerging implementation concerns

Early lessons are emerging from implementation efforts that suggest that the related issues of pagination, queries and bulk endpoints would benefit from some reassessment. Some of these lessons reflect concerns previously raised by various ABA members via GitHub. We propose that a co-design session (or sessions) involving the Data61 API and Engineering leads along with ABA members (and potentially the wider Data Recipient community) should be convened as soon as possible.

We thank you for the highly consultative process adopted by Data 61 and we look forward to working with Data 61 towards a live version of the standards.

Kind regards,

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