



Australian Government



Consumer Data Right

## Consumer Data Right On-boarding Guide: Feedback form

### Contact details

<b>Name</b>	<i>Emma Penzo</i>
<b>Organisation</b>	<i>Australian Banking Association</i>
<b>Email</b>	<a href="mailto:Emma.penzo@ausbanking.org.au">Emma.penzo@ausbanking.org.au</a>
<b>Please contact me about my feedback</b>	Yes - if you would like to discuss any aspect of this submission.

### Feedback categories

Please provide your comments for each category outlined below.

#	Category	Comments
1.	Relevancy of the content to prospective Consumer Data Right (CDR) participants (hereafter <b>participant</b> )	
2.	Quality of the document's organisation in relation to its function (i.e. the structure)	Include the pre-requisite items from the 'Getting started checklist' (page 5) represented at the start of the process steps described on page 6.
3.	Appropriateness to the knowledge and skills of the participant	
4.	Clarity about what action is required from the participant	Provide additional comment on how to become 'registered' pre-step 1.
5.	Whether there are clear contact points and means of contact if support by the ACCC is required	The ABA recommends that the SLA for response times to the <a href="mailto:acc-cdr@acc.gov.au">acc-cdr@acc.gov.au</a> should be 1 business day and not the current 14 days as stated in the acknowledgment response from the ACCC.
6.	Extent to which the vocabulary is easily understood	
7.	Appropriateness of graphical elements (i.e. use of tables, charts etc.)	

## Additional feedback

---

If you have any additional feedback, please provide it in the table below.

#	Section	Comment
1.	<i>On-boarding steps</i> Step 7: CTS	<p>The ABA believes that this process flow will benefit from an additional step 'Testing'. The ABA recommends that testing stages which are aligned to those documented in the ACCC's 'Assurance Strategy Consumer Data Right' (28/8/19) should be implemented for all data holders. That strategy articulated a three-stage testing strategy (a) Internal participant testing (b) Industry testing and (c) Controlled go-live.</p> <p>The ABA notes that the On-boarding does not refer to an industry testing stage. Additional to conformance testing, Industry End-to-End integration testing should be facilitated by the ACCC. Participants cannot undertake this testing. As the entity which is responsible for Accreditation and Registration of Participants the ACCC should either accredit providers to support the E2E testing or should facilitate it as per the referenced document.</p>
2.	On-boarding steps Step 7: CTS	<p>The conformance test suite is relatively limited and therefore the majority of responsibility for verifying compliance is retained with the Data holder, as noted in point 1 above, the Data Holder is not able to undertake E2E integration testing. This approach allows much scope in the depth and coverage of testing that may be executed by participants and could lead to instability in the ecosystem. A more prescriptive set of tests that must be executed and the need to provide proof of testing outcomes as part of on-boarding may improve the quality.</p> <p>Testing would benefit from the ACCC providing a "test" version of the registry which has production equivalent behaviours to allow this integration to be verified much earlier than when onboarding occurs. If the ACCC cannot provide a "test" version, it should accredit private providers to do so.</p>
3.	On-boarding steps Step 7: CTS	<p>The conformance test suite should be fixed to a given versions of the Standards for the period December through to 1 July 2021.</p>
4.	On-boarding steps	<p>Include expected timing for any ACCC steps in the process.</p>
5.	Appendix B: Participant testing scope	<p>Testing scope should be traced back to the Rules and the Standards only. The ACCC should specify a hierarchy of priority amongst the Rules and Standards for situations where the Rules and Standards are unaligned.</p> <p>Guidelines and issues logs should not be part of testing scope. Issues logs are not fixed in content and do not reflect the legal obligations of participants.</p>
6.		

## Submitting feedback

---

Submit this feedback form to the ACCC via email: [CDRTechnicalOperations@acc.gov.au](mailto:CDRTechnicalOperations@acc.gov.au) by 5:00pm (AEDT) on 23 October 2020.

## Confidentiality

---

The ACCC does not intend to share the feedback it receives about the CDR On-boarding Guide (the On-boarding Guide) publicly. All feedback will be handled confidentially within the ACCC and may be used to inform amendments to the On-boarding Guide, unless you specifically instruct us not to in your feedback form. Feedback received will be considered carefully and will be used to inform further amendments and/or incorporated into the final version of the document at the ACCC's discretion.

Further information on the process you should follow when submitting confidential information to the ACCC can be found in the [ACCC/AER Information Policy](#). This sets out our general policy on the collection, use and disclosure of information.