

Tuesday, 26 November 2024

## PURPOSE

AusPayNet is seeking submissions from stakeholders by Tuesday 31 January 2025 on the draft '*Standard for Payment Service Provider Porting of Merchant Payment-Related Data*' and the accompanying '*Guidelines for Payment Service Provider Porting of Merchant Payment-Related Data*'.

## BACKGROUND

On 22 December 2023, the Reserve Bank of Australia ('RBA') issued final tokenisation expectations ('Expectations') for the '*Tokenisation of Payments Cards and Storage of Primary Account Numbers ('PANs')*', aimed at improving security, efficiency and competition for online card payments.

In the Payments System Board ('PSB') Update issued by the RBA on 23 May 2024, the PSB, based on feedback from industry, decided to adjust and clarify the Expectations<sup>1</sup>. The PSB also endorsed AusPayNet – as the industry association and self-regulatory body for the Australian payments industry - undertaking further work to develop potential technical standards to support token portability.

In response to the PSB's request, AusPayNet convened an industry working group to support AusPayNet in developing a potential standard for Payment Service Provider Porting of Merchant Payment-Related Data (Standard). The Standard is attached to this letter and accompanied by Guidelines to assist in the interpretation of the Standard.

## KEY QUESTIONS FOR STAKEHOLDERS

AusPayNet is seeking feedback on the draft Standard and Guidelines, including stakeholder views on the following specific questions:

### Question 1

Subject to feedback received on the draft Standard and Guidelines, the Standard will be presented to the AusPayNet Board for approval in 1H 2025.

Clause 5.2.1 of the Standard details the process to subscribe to the Standard. Are there any inhibitors that would prevent you from adopting the Standard if the draft Standard is approved in 2025?

### Question 2

Clause 3.2.1 of the Standard requires file-level encryption using the OpenPGP standard. Do you consider that file-level encryption is sufficient, or should Clause 3.2.1 require field-level encryption for sensitive data points such as the PAN?

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<sup>1</sup> [Expectations for Tokenisation of Payment Cards and Storage of PANs - May 2024 | RBA](#)

### Question 3

Note: capitalised terms used in this question are defined in the Standard.

Clause 3.5.2 of the Standard requires that where third party involvement is required to support the Porting of the data, the Primary Party that has the direct relationship with the third party is responsible to either:

- a) obtain the necessary information from the third party, or
- b) authorise that third party to directly transfer information to the Receiving Party.

Clause 3.5.2 does not require Primary Parties to incorporate compliance to this Standard in their commercial arrangements with third parties.

Does the absence in Clause 3.5.2 of the requirement to incorporate compliance into commercial arrangements with third parties cause a significant risk to the Porting of data? If so, should the requirement to incorporate compliance into commercial arrangements with third parties be added into the Standard?

### Question 4

Annexure A of the Standard details the JSON schema for the migration transfer file. Will this JSON schema be compatible with your organisation's data structures for the storage and porting of MPR Data. If the schema is not compatible, what changes would you propose to achieve compatibility?

### Question 5

Clause 3.6.1 of the Standard requires that the Sending Party must Port the MPR Data in a timely manner. Does the absence of an upper time limit for when data should be Ported, cause a significant risk to the effectiveness of this requirement?

## AUSPAYNET SUBMISSION GUIDELINES

### Providing feedback

Feedback should be made in writing and sent by email to [psc@auspaynet.com.au](mailto:psc@auspaynet.com.au) with the heading 'Portability Standard Consultation – [Entity Name]' prior to **5pm on Tuesday 31 January 2025 (AEDT)**.

Feedback provided by email should be in a separate document, in Word or RTF format. An additional PDF version may also be submitted.

Feedback will be read by AusPayNet staff working on, or involved with, the development of the Standard. AusPayNet may request a follow-up conversation for consulted stakeholders to provide additional input as necessary.

The aggregated findings of feedback received will be considered to determine whether any amendments to the Standard are required before the Standard is presented to the AusPayNet Board for approval in 2025.

The aggregated findings may be shared, on an anonymised basis with: an industry working group that is involved in supporting the development of the Standard; the AusPayNet Board that is responsible for approving the Standard; and the RBA to the extent that the findings relate to the RBA's Expectations.

## **Any questions**

If you have any questions in relation to the Standard, please contact Sam Gilliland, Standards Project Manager ([sgilliland@auspaynet.com.au](mailto:sgilliland@auspaynet.com.au)).

AusPayNet appreciates your consideration of the Standard.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Andy White', with a horizontal line underneath.

Andy White

CEO, AusPayNet

