



December 22, 2016

VIA ELECTRONIC MAIL

Professor Alasdair Smith
Chair, Retail Banking Investigation
Competition and Markets Authority
Victoria House
Southampton Row
London WC1B 4AD
(Retailbanking@cma.gsi.gov.uk)

**RE: Competition and Markets Authority Notice of intention to make an Order
under Sections 161 and 165 of, and Schedule 10 to, the Enterprise Act 2002**

Dear Professor Smith:

Investnet Yodlee (“Yodlee”) appreciates this opportunity to share our perspective regarding the notice of intention to make an Order to implement the Open Banking standard by the Competition and Markets Authority (“CMA”) on 23 November 2016. As the leading account aggregation platform provider globally with more than 16 years in the industry, Yodlee strongly believes that the implementation of the Open Banking standard will empower consumers to utilize technology tools that will allow them to improve their financial wellbeing.

Yodlee provides account aggregation capabilities with a hosted solution and open APIs on a business-to-business basis to customers around the world, including within the European Union, that include traditional financial institutions of all sizes and financial technology (FinTech) companies. These customers offer data from Yodlee’s platform to hundreds of thousands of retail consumers in Europe through the customers’ own financial wellness solutions, which provide a single platform for consumers to track, manage, and improve their financial health across a host of different banks and financial institutions. Customers also use Yodlee’s platform to establish the authenticity of account holders in real time, along with improving the real-time affordability checks required by providers of credit. Yodlee’s customers include top global banks in more than 20 countries. Leading financial innovators like Kabbage and PayPal are also Yodlee’s customers.

Yodlee is wholly supportive of the development of open API standards to facilitate the secure sharing of consumer financial data. As a founding member of the Financial Data and Technology Association (“FDATA”), Yodlee is particularly appreciative that the expertise and unique skill sets of two members of FDATA’s leadership will be integrally involved in the Implementation Entity and will undoubtedly assist the Implementation Entity in developing open API standards

that permit consumers to share their data safely while ensuring that they can take advantage of a wide range of applications that empower them to improve their financial health.

In our view, the CMA's insistence that the open APIs developed by the Implementation Entity must allow adopters to comply with the second Payment Services Directive ("PSD2") is integrally important. In the absence of this consistency, providers will find it difficult to comply with both the Open Banking and PSD2 regimes and, most importantly, some consumers could encounter disparate data sharing and/or data access experiences which could negate the benefit of their chosen solution and their financial wellbeing. Yodlee recently submitted its comments to the European Banking Authority with regard to its initial draft of the Regulatory Technical Standards for PSD2. Those comments are included with this submission for your consideration.

While a consistent API is necessary to harmonize access, the underlying data model must also be standardized for required account and transaction level details to truly support Open Banking. A complete and extensible data model will directly benefit consumers via their chosen financial wellness solution and support innovation as new models and insights are developed once the Open Banking ecosystem is launched.

Yodlee is also supportive of automatic enrollment in a program of alerts. The types, frequency and content of alerts should receive scrutiny as alerts are only effective if they relate to genuinely impactful issues, else the consumer relegates them to "noise". The desired action of the consumer in response to the alert must also be considered to ensure that each alert generates a financially healthy reaction.

Once again, Yodlee appreciates this opportunity to share its response with you regarding the CMA's notice of intention to make an Order with regard to Open Banking, and would be pleased to provide any further information or perspective that might be of value. Please do not hesitate to contact me if we can be of any assistance.

Sincerely,

Steven Boms
Vice President, Government Affairs
Envestnet Yodlee

Enclosure