

We are a micro SME that is currently in the process of registering as an AISP. We intend to use the Open Banking APIs to provide digital identities assured in accordance with Government standards (GPG-45).

To assure digital identities, the name, date of birth and address of the account holder need to be verified. However we found that whilst Open Banking APIs exist that provide this information such as the parties API - <https://openbankinguk.github.io/read-write-api-site3/v3.1.7/resources-and-data-models/aisp/Parties.html>, they have been marked as "Conditional" rather than "Mandatory", and as a result whilst some banks return the account holder information, many banks do not return this information.

Instead we have seen instances where this information is either already supplied via a commercial API or intended to be supplied by banks under a commercial API using the Extended Customer Attributes (ECA) proposal that OBIE has developed.

We are not sure why this basic account holder information, and the extended attributes are not mandated to be freely available to regulated AISPs like the transaction, balance and other APIs are. This valuable information would open up wider opportunities outside of finance such as the use of digital identity in government, and improve the current issues with inclusivity. But would also increase competitiveness within finance, by allowing users to assert their digital identity during account opening. TISA are currently piloting a scheme to facilitate this type of model.

Free and open access to account holder data held by dominant ASPSPs would increase competition in the same way we have seen with the transaction and balance APIs by making the consumer's data portable.

I see reference to TPP access to additional services in the quote below, however it implies services will be offered directly from the future entity, rather than the future entity ensuring non-discriminatory access to ASPSP APIs. Please would you confirm if additional APIs like the proposed ECA are in scope of these services? If so, is the future entity acting as a "middle man" between TPPs and ASPSPs ?

"3. A charge may be made for Third Party Providers (TPPs) reflecting the additional services they receive from the Future Entity (i.e. services which are over above what they are entitled to by law) – this would be subject to prior competition law review (for example, to ensure that any such charge is fair, reasonable and non-discriminatory) and should not serve as an obstacle to TPP participation in the ecosystem, and instead reflects a value for money, voluntary exchange between TPPs and the Future Entity"

Fair, reasonable and non-discriminatory access is of particular interest to us, because in our case we have reason to believe (but no hard evidence) that one of the CMA9 banks is refusing to supply us with access to their non-Open Banking 'Partner' APIs even on a commercial basis, but will supply our competitors.

In our view we would rather see the CMA ensure further opening of access to dominant ASPSP data that would enable additional use cases such as digital identity, ideally not on a commercial basis. A commercial model where TPPs need to pay to take part would only serve to create a bigger barrier to entry for SMEs in particular. We would rather see a future entity continued to be funded by the dominant ASPSPs by a reduction in entity running costs alone.