Meeting Minutes

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Meeting details
Meeting date: 01/02/2018

Meeting name
Implementation Entity Steering Group (IESG)

Meeting time
10.00 – 13.00

Meeting location
Walbrook Suite, One America Square, London

Scribe
Julie Mitchell

Classification
Public

Name	Role
Andrew Laidlaw (AL)	FCA
Andrew Slough (AS)	HSBC (phone)
Andy Booth (AB)	Barclays
Anne McAdam (AM)	HM Treasury
Daniel Ehreich (DE)	Bank of Ireland (phone)
Daniel Globerson (DG)	Royal Bank of Scotland
David Baldwin	OB Programme Manager
Dora Guzeleva (DGu)	Payment Systems Regulator
Ed Colley (EC)	OBIE Programme Director
Gavin Littlejohn (GL)	FinTech Representative
Helen Ginter (HL)	FCA (phone)
Henry Kuang (HK)	OBIE
Hetal Popat (HP)	HSBC
Ian Major (IM)	TPP Representative (phone)
Imran Gulamhuseinwala (IG)	OBIE Trustee
James Whittle (JW)	PSD2 Representative
John A Hutton (JH)	Nationwide (phone)
Kunal Jhanji (KJ)	OBIE Policy
Mark Chidley (MC)	SME Representative
Mark Mullen (MM)	Challenger Representative (phone)

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Matthew Alder (MA)	HM Treasury
Nuala Jackson (NJ)	Santander
Phillip Mind (PM)	UK Finance
Richard Lindsay (RL)	OBIE Communications
Robert White (RW)	Santander (phone)
Roy Hutton (RH)	Allied Irish Bank
Stephen Smith (SS)	Lloyds (phone)
Vicki Hassan (VH)	Danske Bank
Walter Mccahon (WM)	UK Finance (phone)
Matt Perks (MP)	Nationwide
Ruth Mitchell	Electronic Money Association (phone)

No.	Agenda item

1. Housekeeping: Minutes and Action Log

1.1 **IG** opened the meeting focusing on housekeeping matters. Minutes from the IESG of the 19 January were accepted as approved, subject to the two day process and once amendments from GL, FR and RR are incorporated.

1.2 **IG** proceeded to the action log, noting as follows:

- IESG_2018_301_21: As per action above for JM - Closed
- IESG_2018_301_22: Paper submitted for discussion at today's meeting – Closed
- IESG_2018_301_24: Paper submitted for noting at today's meeting – Closed
- IESG_2018_301_25: Paper submitted for discussion at today's meeting – Closed
- IESG_2018_301_29: Paper received – Closed
- IESG_2018_301_30: Process continuing, submissions received – Closed

1.3 **IG** provided further colour to #30: advising that it relates to P5 discussions (token or mandate) and the process continues as per the outline provided at the last steering meeting. It is currently midway through the review and information is still being verified and consolidated. Papers will be circulated for commentary either before or at the next IESG. **IG** is monitoring the process to ensure a fair and balanced manner.

- IESG_2018_301_35: Update provided – Closed

1.4 **RH** questioned the makeup of the team involved. **IG** confirmed that the team was multidisciplinary and included policy, legal, customer/ consumer along with technical and architecture.

1.5 **PM** asked if prior to the publication of the final document, would he be able share it with his constituents. Would it be a public document or is it confidential. **IG** replied that he would not want all iterations in the public domain and described the process for gathering the information, stating that once the paper has completed the process and is a stable, well thought out document, it would be acceptable for stakeholders to share.

1.6   **PM** asked if there would be time for trade associations to provide their views. **GL** expressed concerns regarding the timeline to allow for inputs that would enable the creation of a stable document. **IG** agreed with their concerns and reiterated the process for additional changes and although P5 is not an official "Evaluation" exercise, if the results were inconclusive, it would require a formal Evaluation.

2.   Programme and MRO Update

2.1   **EC** provided an update on the Programme, advising there had been some further views on the Managed Roll-Out (MRO) and that the programme was now rated Amber. Two and a half weeks in, four of the CMA9 have transacted with the TPPs, two still to go. TPPs are all on-boarded with the CMA9 participants in MRO. Collaboration between the CMA9 and the TPPs is good; however the process has been hampered by the small number of TPPs in the eco system and their ability to engage with more than one bank at a time. Support has been offered to help them through this process. **EC** advised that some of the TPPs have resource constraints and some are very clear on what their propositions are at the end of MRO, the majority of others are in a prototype state rather than having a viable proposition ready for market.

2.2   **EC** confirmed there 100 organisations now in the directory. 25 are fully enrolled and on-boarded into production, all of the CMA9 are fully on-boarded and into production. **GL** had a question on the definition of "production" does that mean they have a live product to provide and are they in MRO? **EC** advised everyone is in MRO production and gave an example of Bank of Ireland. There are also TPPs who have been authorised but have yet to receive their certificates.

2.3   **GL** requested a more graphical slide in the pack explaining what is happening in the different stages.

2.4   **RW** left the conference call.

     ACTION: IESG_2018_301_36 EC to provide a graphical representation of the timeline

2.5   **FR** asked if organisations were applying before they had received FCA approval. **EC** confirmed applications had been received.

2.6   **FR** also asked **GL** how many of the live market were on-boarded. Some have been grandfathered through. **GL** responded that a couple of the AIS providers were talking about a potential route to cease trading as their business model does not demand customer engagement and the models no longer work because of the 90 day authentication. **GL** stressed that they are particularly vexed because the ASPSP can offer alerts without having to re on-board the customer and they believe this makes for an uneven playing field. Many of the larger companies in the AIS landscape are considering not on boarding with OB until the last possible minute due to this concern. They will remain in the grandfather state until the back end of 2019, because they feel that they are at a competitive disadvantage.

2.7   **IG** asked does it address FR problem. Does it apply to all market grandfathers or just the ones that offering this engagement/alert process?

2.8   **GL** gave an example of a financial services company offering a third party sweeping requirement, whereby a customer keen to have the facility and has signed up. **GL** expressed that there is a concern that the ability to sustain that within RTS is going to be difficult. **FR** suggested that this question sits within the PFM model and whether the model is one that consumers want to engage with in that way.. This is a challenge for business models rather than OBIE technology design..

2.9   **IG** expressed it was fine for a TPP to have a prototype for the first stage of the MRO but by the time it gets to real customer engagement, they need to have an existing product that looks like a product. There are some businesses that already have live market offerings but are not entering into the process because of these concerns.

2.10   **GL** advised there were two areas that concern the TPPs, the first being investment in the OB interaction and the second being OB deliverables and the training on the system

2.11   **IG** advised it was important that more TPPs enter with products that are close to market or in the market already. However understood that OB should not expect the live market community to rush to join.

2.12   **RH** stated there are a number of different factors at play: getting through the FCA process, engaging with the CMA. We want to help get the TPPs over the line, but if the TPP business model is not working; we cannot do any more than we have been already. The MRO timeline is looking "sick". **RH** asked if a session with TPPs is required. **IG** understood RH concerns and asked what can be done to encourage more TPPs to join.

2.13   **IM** stated that the regulations should not be underplayed; many are waiting to see what pans out and are conscious that things are not yet stable. A Comms piece may be the way forward to encourage and extol the virtues of joining as well as transparency on the programme status and architecture.

2.14   **RL** explained the comms plan as it stands heavily concentrates on the customer and there is now an additional member of the team that is engaging with the TPPs.

2.15   **IM** also stated that testing is very important for TPPs who wish to join, as it will enable them to assess the suitability. **EC** advised that the TPPs that are in the MIT environment, have very little to test.

2.16   **IM** advised an awareness of the various forms of testing that sit alongside the production environment is important, along with the change requests and version control, and how to keep those matters aligned.

2.17   **MP** asked if the sample was size too small.

2.18   **GL** expressed concern that if the "plumbing" was not stable, then it would not be wise to move a customer base onto a system that was not performing.

2.19   **IG** agreed that comms was an important area, but asked the IESG again if there was anything tangible that should be done.

2.20   **FR** explained that this was a regulatory journey and the FCA has set up Project Innovate to specifically help with this. There are a number of the TPPs already in this project, but how do we link with the FCA and leverage those companies and encourage and support them through the authorisation process.

2.21   **RM** expressed concern that the PIS perspective had not been considered. PIS propositions are out there operating in the same way. One factor which is guiding their decisions as to whether to get involved or not is, are the specifications going to evolve to actually deliver and match their current propositions for PIS. **RM** advised that a clear message on how the specifications are evolving is required. The PIS need to know if it is worth getting involved and investing in OB or pursue something else, especially as the RTS deadline approaches.

2.22   **IG** asked **AL** if the FCA authorisations were causing a bottleneck and to comment on the experiences the TPP were having through the process. **AL** advised that there were a number in the pipeline who had not submitted complete applications. Feedback ranged from the process had been too intrusive to fairly straight forward. Some are coming direct or via Innovate.

2.23   **GL** advised a number of firms have had to go back as the forms were insufficiently completed and their insurance inadequate. **AL** acknowledged this and identified that the team have been reviewing the various polices, which are often complex and sometimes mismatched.

2.24   **RH** asked if there is an issue getting PI cover, could a list be circulated. **KJ** advised that a PI event ran a few weeks ago, and was the fourth round table designed to re-educate and answer any questions. It was hosted by Lloyds of London, with underwriters and brokers all willing to engage on this. **KJ** agreed that on the portal, a list of tried and tested insurers, that could be a first point of call for the TPPs would be a good idea.

2.25   **GL** stated that he was aware that both FCA and OBIE had been engaging with potential participants in the new PSD2 insurance market. Given that many TPPs had found it difficult to source appropriate insurance, it would be very helpful for OBIE to curate a list of firms that they know have an interest in active market participation and find a way to share the list with TPP market. **FR** asked if there was a toolkit, explaining the various processes and contacts on the OBIE website.

2.26   **IG** asked that as it is a small number of TPPs in the pipeline, is there a requirement for an OBIE person to coach the TPPs and provide a "hand holding" service. **IG** acknowledged that some TPPs are using third party consultants to ensure they are prepared for the FCA submission process; fine for businesses with deep pockets, but will not suit the smaller firms. **IM** stated that this is about optics and having some direct OB support may encourage more applications.

2.27   *IESG_2018_301_38 EC to provide a memo on the barriers to entry to TPPs joining the Managed Rollout. To include cost implications for OBIE resource.*

2.28   **MP** suggested a buddying option for groups that were struggling to get on-board. **IM** said that this had been under discussion with EC.

2.29   **RW** asked why there were bottlenecks and suggested that we could give the TPPs a Q&A to assess what went well and what didn't.

IESG_2018_301_39 EC to organise a webex Lessons Learnt session for 5 of the TPPs.

2.30   **EC** also provided an update on Release II, with progress going well bar the P5 discussions.

2.31   **FR** expressed concerns on the real-time, notification of revocation of consent and provided feedback as there are issues around consent management and messaging. **FR** stated that current specifications do not meet the customer or TPP needs and a real time option is required, especially if single immediate payment needs further review. **FR** advised she had not heard any in-depth discussions around this item and asked what the process was for acknowledging the risks that have been raised.

2.32   **IG** asked what the form of revocation is. **EC** explained the meaning of the revocation and the process that sits behind it. **EC** and **FR** had a difference of opinion on approach. **FR** proceeded to advise the IESG of her view on the approach. **EC** stated there were various options, which all come at a cost and liaison with the TPP community is needed to see what the appetite is. **RW** asked what the concern was, who needs protecting. **FR** advised that it's the consumer.

2.33   **IG** stated that because the matter had not been escalated by other stakeholders, nor was he aware that the TPPs felt strongly about it one way or the other, the matter had not been taken any further. **IG** asked what the appropriate response in requesting this is. **MP** agreed with FR points. **IG** then reconfirmed that Barclays, Nationwide and Consumer would welcome two-way, real time versus polling.

2.34   **RM** advised that information emerging from discussions from the technical working groups was that PIS would welcome a two-way, real time notification. The technical decision about deciding not to use web hooks in the design was also discussed in depth.

2.35   **GL** advised that the AIS market would probably view the two-way notification as the least worst outcome. They would prefer redirection for revocation.

2.36 **FR** advised there was a messaging requirement in terms of how the ASPSPs /TPPs message and the potential and wider implications for switching, that hasn't been worked out on token based yet. **FR** asked if the IESG could look at this holistically, rather than pursue a tick box exercise to release it. **FR** believes there may be some confusion around the journeys for switching, opt out, revocation and can see the potential for killing a few birds with one (well designed) stone.

2.37 **IM** asked does the use case warrant real time and believes the answer would be variable.

2.38 **IG** advised that he sensed that using polling based revocation got a 90% solution using the existing technology, which is an extension of the existing API framework. **IG** also stated that real-time means a new messaging system that would have to sit alongside it, which he didn't think would be effective and proportionate to test. If more than one stakeholder requested a review to take place, then it can, but not at the detriment to the development of the current process.

2.39 **RW** stated that it cannot be based on technical discussions alone. There is a need to look at the design view and maybe step back a little and make sure that all bases have been covered.

2.40 **IG** advised that P5 is giving cause to take stock, but that he was not prepared to continually miss deadlines due to the continual re-evaluation of items. **IG** agreed that appropriate time to review is required but this should not stop or slow down work on the existing approach. In parallel **IG** requested the OBIE, cover this in a shorter time period and do a side by side comparison.

2.41 **KJ** advised there is an exceptional PAG taking place on 5 February and will include discussions on the submissions to the January IESG. These papers will be reviewed so that agreement on the process for implementing the current design may be reached.

IESG_2018_301_43KJ to provide a memo on the proposed solution of real time versus polling relating to two way notification revocation.

2.42 **MC** expressed his concerns from a customer viewpoint and that he believed there was an obsession on looking at technology alone, however that is just the starting point, if the end product is not what the customer wants, then OBIE is not achieving what was set out in the beginning. **MC** was worried IG felt this was only an issue for consumers, and that it is not as important as a technical or CMA9 issue. **MC** requested clarification, he believes as the programme progresses and more detailed views of products being adopted by customers emerge, there will be more issues like this that haven't been adequately reviewed through a consumer lens and asked that the OBIE/IESG think about this from a consumer perspective. **IG** asked MC to look at the programme in the round, stating there are many areas with bigger issues, and that there is limited time and capital to try to fix those, rather than adding additional items. **IG** confirmed that there is a plan in place, with PAG taking responsibility for delivering the memo. The overall criteria it must be effective and proportionate.

2.43 **GL** added that he would like PAG to analyse the liability model and risk register of two way revocation.

2.44 **IG** requested an update on DMS at the next IESG on 22 February 2018. **FR** asked for a paper for noting as she felt there were some key issues around liability that are still not resolved.

2.45 **GL** asked a question about the history and timelines of the Roadmap. He was concerned that a line in the sand was drawn in late autumn 2017, with a bump in the road in January 2018. Are those original timelines staying as is or are there new timelines that take into consideration a number of issues faced? **IG** responded that the Roadmap timelines pre-date the concept of MRO and within that map there has always been an option to review the timelines. **IG** also stated that the CMA9 always need to safeguard six months for implementation and that he would prefer to review and reaffirm the timelines in that document if required. **IG** confirmed that in the light of P5 it will have to be revisited, as there is no way now that P5 can be delivered as part of Release II. **GL** stated that focus had been revolving around 13 January 2018 deadline, during which time; the OBIE technical team have forged ahead.

Now they are refocusing on all these issues. **IG** advised that a timescale to review and agree the timeline had not yet been agreed. He wanted to be comfortable that the evaluation completed on governance, discussions around P5 and two-way revocation were completed and if additional reviewing and changes were required, it would be a "big deal" and will affect the Order.

2.46   **AB** suggested that a plan against the Roadmap was needed. **IG** agreed there was a plan against the map. **GL** referred to the 19 February 2018 as a key date and that everything needed to be done, relating to the technical API standards otherwise Roadmap deadline will be missed. **GL** stated that he felt a sense of "indigestion" within the programme, with all the different policy items coming through and trying to meet that deadline, he questioned if the deadline itself might not be correct. **IG** confirmed that the 19 February related to Release II and discovery items. He doesn't yet have a firm view, and if things are on track, there is no particular reason to slow it down. There are some workflows on-going in relation to Release II. The OBIE should not down tools but be smart on how the February deadline is managed.

2.47   **IG** then turned to the CMA9 updates on the Programme, asking for comments by exception. **RH** provided an update from the perspective of AIB.

2.48   **DG** suggested that an MRO scorecard would be helpful. **IG** advised this will be covered in the broader spectrum slide as requested by **GL**.

2.49   **IG** asked **JW** to provide an update on a matter relating to his position on the IESG.

2.50   **JW** advised the IESG on the new market facing group, established by the European Commission (EC). He explained their functionality in terms of supporting ASPSPs around compliance with PSD2 and RTS. **JW** continued that this body is non-decision making in terms of the legal process, it publishes guidelines, supported by the market. **JW** explained the make-up of the group: three ASPSPs, three TPPs, three consumer and two other interested parties. The Commission asked JW to Co-Chair and he as accepted. **JW** advised that it is not ideal to sit on the IESG as a representative of PSD2 as there could be a possible conflict of interest and he has agreed to step down and this will be his last meeting. Paul Horlock supported by Doina Nicolici as secretariat/observer will now take his place.

2.51   **JW** continued that as Co-Chair of the group, all European initiatives that are already recognised in the Euro Retail Payments Board report published at the end of last year (OBIE being one of them), will be written to and invited to the kick off meeting on 28 February in Brussel's, to allow the process of evaluation to begin. It will allow Hot-Topics to be submitted by the initiatives to get clarification on; a view at European level on PSD2 and market acceptance. It will provide guidance and Q&A and it would be useful to have a short update on any items going forward to an IESG meeting.

2.52   **IG** thanked JW for his support on IESG and stated that his new position creates a real, formal link for the OBIE with Europe. And recognised the benefits of having JW in the role and the support it can provide on clarifying issues and getting the standards more widely adopted.

3.   **Governance process for Roadmap deliverables**

3.1   **IG** provided an introduction on the Evaluation paper. There has been good and constructive input from stakeholders and is now a process that is fair and transparent. It has been laid out as a step by step process, starting with consensus around scope, then reporting and recommendations; with those recommendations ready for representation to the Trustee to take to the CMA for a final decision. **IG** advised it also delineates the difference as to what is "penned" by the OBIE, the representations of the stakeholders and how the final mechanism works: which is a report to the Trustee and then a consultation with the CMA. It also recognises that there may not be a consensus, but a requirement to figure out a way of getting through that without creating a logjam. It also talks of creating two more evaluation working groups and there will be a request for volunteers. **IG** stated that due to time constraints the group should go straight to Q&A.

3.2 **FR** agreed this was a transparent document, but would be a challenge to keep to it. There was also a need sharpen up how timings are managed in meetings too. **FR** asked to what is the extent this can be used for similar issues. **IG** stated that it was not a coincidence that P5 (which is not an evaluation item) discussion mirrors this process, its needs to be clear, transparent, give everyone the opportunity to provide input and demonstrate clear delineation. That broad process will be mirrored; there will be tweaks where necessary, however not sure it will work for the transition to the NPSO.

3.3 **FR** stated that there was no discussion about transition to the NPSO or representation or any formal paper on that. **FR** Also commented that on a consumer facing issue in an evaluation there is a point of reference for the consumer forum, which is helpful.

3.4 **KJ** confirmed the tasks for the representative is that they are representing the forums and stakeholder groups. It is a mechanism to broaden the reach and through these representatives, the OBIE can get as wide an input as possible. There will also be business analysts supporting the representatives to run those discussion groups to get the right input.

3.5 **PM** agreed the scope is very thorough but could be extended to discovery items, where there are contentious issues. **PM** also asked about artefacts, and from a trade association perspective, it would be helpful to share those artefacts at each of the key stages and provide feedback into the process. **PM** asked if they could they be stored somewhere that is easily accessible.

3.6 **KJ** advised that he would welcome feedback on the two artefacts and the preliminary report, as it is that, which is used to prepare the final.

3.7 **IG** advised that the consolidated viewpoint is for his eyes only and the inputs would be confidential, however the artefacts should be publicly available. The addendum will be public and there needs to be a clear approach on what is confidential and every paper has to be correctly classified, with firm version control.

3.8 **KJ** confirmed the role of the working group: to socialise the document to the relevant groups and forums for input. **RH** requested that realistic turnaround timelines are applied. **FR** gave an example of P5 and how the issues percolate very quickly and that on occasion the paper being read is no longer fit for purpose and out of date. Content is moving very quickly and a covering memo would be useful to keep up with the iterations.

3.9 **MC** asked what decided the priority for evaluation. **KJ** confirmed it was the Roadmap. **MC** then asked about some of the adjustments to dates on page 31. **KJ** explained the process in detail and advised that the dates are reverse engineered and need to happen six months prior to delivery of RTS. **KJ** understands internal timescales and is looking at resource management internally so that the deadlines can still be met.

3.10 **PM** asked who the decision maker is, acknowledging that IG would write the letter, but how are FCA and European Commission API Experts Group involved. **IG** responded that for Order items nothing changes. His position is to create a consensus or come to a decision if consensus cannot be met. **IG** stated it is critical that all representations are captured to enable a recommendation to the CMA. **IG** advised that it is important to crystallise thinking and rationale in writing. **IG** has not had the discussion with the CMA if the letter of recommendation can be made publicly available.

3.11 **IG** followed that regarding the non-Order items and PSD2, the CMA9 has made a commitment to HMT and he would provide a view, however HMT have not made him a signatory. It would be down to the CMA and HMT to finalise non-Order matters and this would not play out in the public domain.

3.12 **HP** stated that PDS2 and CMA items must align, should it not be clearer on page 40 that this is a primary objective. **IG** stated that the OBIE assessment of the situation is an important factor for the CMA, written in the Order is the requirement that we have to align with these regulations. Your specific point is not in the CMA thinking. They want to create effective and proportionate solutions. **HP** PSD2 is

very vague and there are number of cases for doing this, which are likely to be fully compliant but at the detriment of the customer.

3.1   **FR** expressed concerns about completing this with a compliance only view and that it should not be pursued in that manner as it can store up "harm" for the customer, which later requires further regulatory intervention and cost. We should ensure we are informed about the trade-offs that are made and be able to articulate these so we know what risks we are storing up. There is a need to create a dynamic eco system which works well for all participants.

3.2   **DG** stated it may take years before this initiative catches on, it doesn't mean it has failed, but where is the tipping point, no one can tell or predict. OBIE will have to wait and see what happens in the market.

3.3   **IG** said that this evaluation is not black and white, OBIE are trying to ensure that there is a process that everyone is clear on and it is fair and everyone can provide input. **IG** disagreed with **HP** in that it maybe HSBC's primary objective but it is not the CMA's, which is to achieve the outcome of the Order.

3.4   **AB** had a number of issues a) scoping definition – would provide feedback on email to IG b) legal and regulatory on page 28, need to provide a view on alignment and include different views c) on the process on page 25, the evaluation between preliminary and final, will PMG provide input for noting?

3.5   **IG** stated that he is sensitive to the role PMG play and advised he will address this during governance. PMG is just the CMA9 and it is important that non CMA9 get full transparency of the whole process and that PMG does not exert undue influence on what is being done.

3.6   **SS** expressed concern over earlier comments regarding the limited TPP take up and overall state of progress. He is worried that the programme is rushing to evaluate in silos because the Order says it has to be done. **SS** observed that a step back is required and further discussions need to take place; discussing how to get momentum in terms of getting more TPPs on board. **SS** stated that focus should be on what is working and there are still a number of banks that are not fully compliant. There is a sense of disbelief in Lloyds that this is all good, but is it really what should be the main area of focus right now? Facts are emerging and they need to be reviewed instead of rushing off to meet timelines. **IG** agreed this was a helpful point, and agreed with GL's point on timelines and reprioritisation. It is key is to ensure that learning more about these individual matters is not deferred or we could lose the opportunity to form a consensus around them.

3.7   **DG** stated that the OBIE should not risk losing the potential support of the NPSO and other bodies and agreed there are matters that definitely have to be done. **DG** added further that if he was sat on the other side, he would feel alienated, seeing these discussions taking place that do not apply to his business. It seems like quite a big risk. **SS** suggested a sharper focus to the evaluation; facts are emerging about TPP take-up do not delay the evaluations but probe the TPP community more and gauge the reaction to their responses if some of these items are done.

3.8   **GL** had a question for **JW** regarding PSD2. In the event that something is uncovered, which is not in the market or customer interest (RTS just about go through European parliament). What is the feedback to the policy process to unblock? **JW** said it would be difficult; however market acceptance is the route to challenge (with evidence) what is required in law where there is ambiguity. This is a positive opportunity for OBIE to demonstrate it has followed the process, showing the evidence based compromises it has had to make or is prepared to make to enable a better outcome in terms of market acceptance. It needs to be clear that the usage is primarily for TPPs. It is important that the Commission and EBA can go away and get clarification.

3.9   **MP** asked what is the route in for new ideas for the roadmap. **IG** agreed that it was a fair point, at present it is reactive and prescriptive.

3.10   **IG** covered additional actions stemming from this meeting.

- *IESG_2018_301_44   IESG queries on the Comms plan paper: direct to Richard Lindsay.*
- *IESG_2018_301_45   IESG queries on the Liabilities paper: direct to Kunal Jhanji*
- *IESG_2018_301_46   IESG to provide nominees for evaluation working group relating to page 20 by 7/2/2018.*

3.11   **IG** turned to the Change Request P6 - a request by PMG to the IESG. A decision is needed. **IG** I will circulate an email detailing a governance process around change requests and it will incorporate this request. This will allow non CMA9 to provide input into that and will take a view if further discussion is required.

3.12   **IG** closed the meeting