

# Meeting Minutes

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### Meeting details

Meeting date: 26 February 2020

### Meeting name

Implementation Entity Steering Group (IESG)

### Meeting time

10.00 – 11.30

### Meeting location

Etc. Venue, Capital 1, Eastcheap (Monument), London

### Scribe

Sally Chiwuzie

### Classification

Public

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Name		Role	Attendance
Alan Ainsworth	<b>AA</b>	OBIE – Head of Policy	Yes
Bill Roberts	<b>BR</b>	Competition and Markets Authority (CMA)	Yes (Phone)
Candy Ma	<b>CMA</b>	OBIE – Office of Trustee	Yes
Carly Nimmo	<b>CN</b>	HMT	Yes
Caroline Ambrose	<b>CA</b>	Barclays Bank	Yes (Phone)
Chris Michael	<b>CM</b>	OBIE – Head of Technology	Yes
David Fineberg	<b>DF</b>	OBIE – Head of Monitoring	Yes
Ed Colley	<b>EC</b>	OBIE – Programme Director	Yes
Faith Reynolds	<b>FR</b>	Independent Consumer Representative	Yes
Gavin Littlejohn	<b>GL</b>	Fintech Representative	Yes
Hetal Popat	<b>HP</b>	HSBC	Yes
Imran Gulamhuseinwala	<b>IG</b>	OBIE – Trustee/Chair	Yes
Mark Chidley	<b>MCH</b>	Independent SME Representative	Yes
Matt Cox	<b>MC</b>	Nationwide Bank	Yes
Phillip Mind	<b>PM</b>	UK Finance	Yes
Roy Hutton	<b>RH</b>	Allied Irish Bank	Yes (Phone)
Sally Chiwuzie	<b>SC</b>	OBIE IESG Secretariat	Yes
Simon McDougall	<b>SMD</b>	Information Commissioners Office	Yes



- 1.6. **IG** moved on to discuss the open actions, inviting IESG members to walk through from slide 25 (*Note: action updates are documented on slides 3-6, with additional comments captured below*).
- 1.7. With regards to action #228 (*Programme Update – MI*), **IG** advised that it this is a forthcoming item on the Roadmap and the intention, therefore, is to keep it open until the Roadmap is agreed.
- 1.8. **IG** advised that action #330 (*P14 Evaluation of Efficacy of Account Comparison*) is also a roll forward because it is included in the revised Roadmap.
- 1.9. On action #336 (*Programme Update – KPIs*) **IG** stated that this is correctly marked 'for closure', the MI was distributed out of cycle as promised.
- 1.10. With regards to action #338 (*Screen Scraping Migration*), **IG** advised that **EC** would walk IESG members through this as part of agenda item 2.a. **IG** hoped that the FCA would have joined the meeting by then to contribute. **IG** advised that this action can now be closed.
- 1.11. For action #339 (*Impact of SCA and other risks on consumers - proposal by Consumer and SME representatives*), **IG** reminded IESG members that this relates to the paper proposed by **FR** at the January IESG meeting which has now come back this IESG as agenda item 2.c. **IG** informed IESG members that **FR** and **AA** would be presenting the paper.
- 1.12. With regards to action #440 (*Customer Evaluation Framework*), **IG** reminded IESG members that this is about a round table to be organised by **FR** to get a better understanding of CEF. **IG** stated that this is in the process of being organised for 11 March 2020.
- 1.13. **IG** advised that action #441 (Revised Roadmap) has been completed from an OBIE point of view and is sitting with the CMA for consideration. On this basis, **IG** stated that this action could be closed.
- 1.14. **GL** asked if the Hogan Lovells report on DMS could be shared. **FR** added that this went to the CMA9 and hoped it could be shared more widely. **AA** stated that it contained nothing contentious. **IG** asked **EC** to confirm with Hogan Lovells that the report can be shared; following which it will be distributed to IESG members.

***ACTION - IESG\_2020\_301\_442 – HOUSEKEEPING – ACTIONS – EC to check with Hogan Lovells that the report on DMS is suitable for onward sharing and then distribute to IESG members.  
Due date – 24 March 2020***

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### ACTIONS

Action Number	Date Raised	Owner	Description	Notes	Target Date	Status	Date Closed
IESG_2019_301_228	17/10/2019	EC	<p><b>Programme Update - MI</b> - Improving the MI process and information quality, including eliminating synthetic authentication requests whilst providing TPPs and TSPs with critical real time information on aspects such as availability, performance and quality to be presented as an agenda item at the next IESG (19 November 2019) with all suggestions from IESG members to be sent through to EC by 01/11.</p>	<p><b>Update 26/02</b> – This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to the March IESG.</p> <p><b>Update 16/01</b> - This has been incorporated into the revised Roadmap and would therefore remain open. Carry forward to February IESG.</p> <p><b>Update 08/01</b> - Action to remain open during consultation on the roadmap. Carry over to February IESG.</p> <p><b>Update 17/12</b> – This was discussed as part of the roadmap consultation; agenda item 2.e. Action to remain open during the consultation.</p> <p><b>Update 07/11</b> - This will be incorporated as part of the revised roadmap proposal and consulted upon.</p> <p><b>Update 18/10</b> - Memo re this action was sent to IESG members via the Secretariat with responses requested by 01/11.</p>	24/03/2020	Open	
IESG_2019_301_330	17/11/2019	AA	<p><b>P14 Evaluation of Efficacy of Account Comparison</b> - As discussed at IESG on 17 October 2019, IESG members to provide stakeholder representations to the Trustee, copying in Alan Ainsworth by 25/10.</p>	<p><b>Update 26/02</b> – This is awaiting completion of the Roadmap consultation to proceed. Carry forward to the March IESG.</p> <p><b>Update 08/01</b> - Awaiting completion of roadmap consultation to proceed. Carry forward to February IESG.</p> <p><b>Update 17/12</b> - IG stated that a letter has been prepared by the OBIE team but discussions were being finalised and this would therefore be carried forward to the IESG meeting on 16 January 2020. Carry forward.</p>	24/03/2020	Open	

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				<p><b>Update 19/11</b> – At the November IESG, AA stated that four representations have been thus far received and there appears to be a level of consistency to these representations, there would be an update at the next IESG of 17 December 2019. Although the deadline for representations was 25 October 2019, late submissions would be accepted.</p> <p><b>Update 11/11</b> - Review of the stakeholder representations is in progress. Carry forward to the December IESG.</p>			
IESG_2019_301_336	19/11/2019	EC	<p><b>Programme Update – KPIs</b> - EC to distribute KPI's out of cycle before the IESG meeting of 16 January 2020. The January agenda is to include two months narrative (November and December 2019).</p>	<p><b>Update 05/02</b> - An out-of-cycle pack containing V3 MI for November and V1 and V3 MI for December 2019 was distributed to IESG members on 05/02 following a challenge period of 2 days given to the CMA9. This information will also be published on the website. Propose to close.</p> <p><b>Update 13/01</b> - The OBIE has been unable to distribute November MI due to late receipt of data from HSBC. Consequently, although the IESG pack contains November KPIs for publication it will not include November supplemental V3 information. December KPIs cannot be published as that data has not yet been received by HSBC. This will be sent out of cycle.</p> <p><b>Update 08/01</b> - This is to be discussed as part of agenda item 1.c at the January IESG. Propose to close.</p>	26/02/2020	Closed	26/02/2020
IESG_2019_301_338	16/01/2020	EC	<p><b>Screen Scraping Migration</b> – The FCA to join a PMG forum to be scheduled week commencing 20 January 2020 to discuss screen scraping migration, including CMA9 responses to the document presented at IESG with a view for findings to be sent to the FCA.</p>	<p><b>Update 26/02</b> - This was discussed as an agenda item at the February IESG. This action can now be closed.</p> <p><b>Update 12/02</b> - PMG held 11/02. FCA took all CMA9 feedback. Weekly comms to be issued on status update. Status update to be presented at the February IESG - aiming to distribute with tranche 2 pre-read to enable IESG members to receive the latest information.</p> <p><b>Update 05/02</b> - Another PMG is scheduled for 11/02 to continue this conversation.</p>	26/02/2020	Closed	26/02/2020

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				Update 23/01 - PMG 'hot topics' scheduled for 28/01/2020. The HOZ of the FCA has been invited to attend.			
IESG_2019_301_339	16/01/2020	AA	<b>Impact of SCA and other risks on consumers (proposal by Consumer and SME representatives)</b> - FR/CA/MCH/AA to meet to discuss the possibilities of collating a risk log, after which the secretariat should be advised of when it will be ready to come back to IESG.	<p><b>Update 26/02</b> - This was discussed as an agenda item at the February IESG. This action can now be closed.</p> <p><b>Update 19/02</b> - Recommendation paper included in the agenda for the February IESG. Propose to close.</p> <p><b>Update 10/01</b> - Rough draft prepared ahead of call (Caroline Ambrose, Daniel Jenkinson, Faith Reynolds, Mark Chidley, Alan Ainsworth). Caroline took the action to update and develop the draft. Caroline's recommendation was that this draft should come back to IESG, with a recommendation that a smaller risk group is set up to monitor the risk log, update it, etc and that this becomes a standing item to come back to IESG monthly. This is subject to IESG approval.</p>	26/02/2020	Closed	26/02/2020
IESG_2019_301_440	16/01/2020	FR	<b>Customer Evaluation Framework</b> - FR to facilitate a consumer roundtable to enable better understanding, particularly in terms of scope and purpose of the CEF.	<p><b>Update 26/02</b> - This was discussed at the February IESG. This action can now be closed.</p> <p><b>Update 05/02</b> - This has been scheduled for 11/03. Propose to close.</p> <p><b>Update 10/01</b> - An initial call is being set up to scope out the roundtable, between Alan Ainsworth, Faith Reynolds, Daniel Jenkinson, Richard Koch and Mark Chidley for week commencing 27/01. The aim is to get invites out to a small group who will form the Roundtable in February.</p>	26/02/2020	Closed	26/02/2020
IESG_2019_301_441	16/01/2020	IG	<b>Revised Roadmap</b> - Trustee to finalise the revised Roadmap and share with the CMA.	<p><b>Update 26/02</b> - This was discussed as an agenda item at the February IESG. This action can now be closed.</p> <p><b>Update 05/02</b> - The Trustee shared the finalised proposal on the revised Roadmap with the CMA on 03/02. For closure.</p> <p><b>Update 03/02</b> - Trustee shared recommendations with the CMA.</p>	26/02/2020	Closed	26/02/2020

## 1.c PROGRAMME UPDATE

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### 1.c.i OBIE STATUS REPORT

- 1.15. **IG** introduced the programme update section asking **EC** to highlight key information. **EC** stated that the main reason for the Amber status relates to **IG**'s opening remarks about the Roadmap. **EC** explained that some items within the Roadmap have been updated (e.g. the Customer Evaluation Framework), while other items (e.g. the Nesta Open Up Challenge Digital Campaign) have commenced, but updates will follow at the next IESG on 24 March 2020. In terms of conformance, **EC** asked IESG members to note that while there have been improvements, there is still some work to be done and each of the CMA9 knows their action plan. **EC** added that it is important for the OBIE and the CMA9 to support the TPPs who are moving from prior versions to version 3 and also to support the screen scraping migration as far as is practical (**EC** reminded IESG members that he would be addressing this further along the agenda).
- 1.16. **IG** invited questions with regards to the Open Banking status report, there were none. **IG** stated that firms are obviously waiting for the revised Roadmap to be completed as a number of action items will be incorporated into the plan.
- 1.17. **IG** asked if there is anything in the revised Roadmap that should be highlighted as a potential risk. **EC** stated that there is nothing in the implementation entity itself that poses a risk, however, a number of activities that have required engagement from the community have not yet started, adding that this amounts to pressure on the originally published delivery timelines, particularly the evaluation components and standards related work. **EC** explained that once mobilisation begins and feedback is received from the ecosystem, there will be more definitive answers.
- 1.18. With regards to the OBIE conformance suite documented on slide 28, **GL** stated that there are two learning points:
- 1.18.1. Customer Experience Guidelines and conformance are important; and
  - 1.18.2. The ability to use software to test that the security profiles should be standardised rather than fragmented for both the TPPs and ASPSPs.
- GL** stated that these are critical learnings in the UK which every other market is trying to pick up on. On that basis, **GL** expressed surprise at the low levels of either testing or being able to prove that testing has been conformed to. **GL**'s question was whether firms are conforming but not testing (could they be mandated to test) or are firms struggling to make themselves conformant. **GL** thought that this should be moved from the OBIE status report on slide 28 to the CMA9 report on slide 29 and should include other relevant parties.
- 1.19. **IG** shared **GL**'s disappointment about the fact that there is yet to be a clean bill of health across all of the CMA9. **IG**'s understanding is that the conformance tools themselves test a large group of functionalities, a completely clean bill of health is a very high benchmark. Therefore, **IG** felt that some depth of understanding as to the gap is required; **IG** asked, for example:
- 1.19.1. Is it a margin for some endpoints that are barely used, or
  - 1.19.2. Is there a big miss – the binary measure is not that helpful.
- IG** explained that the lack of adherence to conformance tools was raised in the status report to the CMA and this will also be reflected in the performance improvement plans, it would be good to determine which of the CMA9 will move on to performance plans and what kind of reporting would be used to track these.
- 1.20. **EC** explained that in terms of the status updates of any individual firm, including both CMA9 and non CMA9, from a security profile perspective and functional conformance perspective, both are public on the confluence site. **EC** explained that the progress of the CMA9 towards security conformance, even the non-conformant ones, there is significant progress being made. On the other hand, **EC** explained that security conformance tickets from the non CMA9 suggest that they have not been mitigating the errors that come out of functional and non-functional conformance tools and security.
- 1.21. **CM** explained that it is more important around security conformance and in **CM**'s view, there is no excuse for firms not to pass the security conformance tests and certify. **CM** added that there is a significant risk to the security of

the data if firms do not pass or certify for the security profile. **CM** suggested that this should be taken offline and firms should be approached individually. **CM** stated that functional conformance is nuanced as the complexity is down to the fact that the functionality varies in the firms even by product, therefore, there are a lot of edge cases, additional data fields and the tests are more complex. **CM** explained, therefore, that in August, September and October 2019, a tranche of firms passed the conformance, while a number were struggling and of those, this was down to edge cases where something in the tool needs to be unblocked for example. **CM** added that there has been some reluctance by some of the firms to run and supply the test results. **CM** stated that when results are shared, issues can be resolved quite quickly. **CM** reiterated the fact that there are lots of nuances, different products behave differently, but added that firms need to be certified against the FAPI profile as it is a risk to the firms that do not conform.

- 1.22. **GL** added that economically, being conformant reduces the overhead for all banks and TPPs, adding that during the go-live in January 2018, it took months of integration between banks and fintechs and a lot of handholding on both sides; the conformance and security profile radically reduces the engineering input from both sides of the equation and ensures certainty of connections. **GL** added that it enables things such as dynamic client registration. **GL** stated that UK government has to mandate this for the CMA9, all TPPs and ASPSPs.
- 1.23. **IG** shared disappointment that a clean bill of health for conformance is lacking. The conformance tools themselves test a large group of functionality and having a clean bill of health is a high benchmark.
- 1.24. **EMB** asked for the AIS conformance for Santander to be updated as this was passed in January 2020. **CM** stated that on developers' zone, Santander is reported to have passed AIS.

***ACTION – IESG\_2020\_301\_443 – Programme Update – OB Status Report - AIS Conformance for Santander to be amended to show that the bank has passed.***

***Due Date – 28 February 2020***

- 1.25. **IG** confirmed that five of the CMA9 have passed the AIS conformance. **GL** asked if the measurement is by brand. **IG** stated that the point of the conformance tool is to ensure that the APIs have been implemented the way they are intended on both the functional and the security and these are crucial to ensure that connections can work and when the connections do not work, the problem can be identified. **IG** added that in the early days the biggest problem was that the TPPs were pointing at the ASPSPs and vice versa resulting in a lot of effort by the OBL to try and figure out where the problems were. **IG** reiterated that this is a good practice which is taken seriously. **IG** stated that the black and white approach to reviewing conformance is too clumsy as there is a lot of depth to be understood. **IG** added that the intent behind the performance improvement plans which is an item under the revised roadmap is intended to capture that and once this has been addressed, the levels of reporting that goes into IESG will be reviewed. **IG** asked **EC** where conformance is published and at what detail – black or white, pass or fail, granular? **EC** explained that it is black and white in the context of whether they have passed (it contains the detail and the information is public). **EC** looked at this information, stating that most of the CMA9 have passed the original OBIE security profile, whilst majority of the CMA9 have not passed the FAPI security profile.
- 1.26. On FAPI, **EC** explained that across the industry, few firms have passed. **IG** asked if this was a procedural aspect, which **EC** confirmed. Going back to the importance of the security profiles, **EC** stated that it is not a onetime pass as when infrastructures and facilities change, it should be recertified. **IG** thought it would be appropriate to give due attention to this, and as part of the Roadmap going forward, it should be a key item to be explored.
- 1.27. **FR** asked what the downstream impact is on consumers. **EC** explained that if a firm has not passed the original OBIE security conformance and / or has not got a FAPI conformance, then depending on their implementation, there are downstream security risks that will ultimately manifest with the consumer. **FR** echoed that the consumer bears the risk.
- 1.28. **SW** wanted to define what the risk actually is as RBS would go through their own internal security which involves huge compliance operations before anything is put live. On this basis, **SW** was reluctant to agree that the consumer bears the risk.

- 1.29. **HP** commented on the risk raised, stating that the way it is being portrayed makes it look larger than it might be in reality, all the regulated firms have stringent controls ahead of putting things out live and many of the conformance issues are fussy little changes which if looked at in terms of materiality of the risk to the firm or consumer is extremely low. **HP** agreed that the fixes should be made and is supportive of this being a Roadmap item, but did not think the risk should be characterised as high.
- 1.30. **IG** explained that this is about adherence to a standard as opposed to a classical or material risk of data loss. **EC** stated that with the CMA9, majority went through OBIE security profiles and some have FAPI so there is confidence, however, for the rest of the ecosystem, this is not the case.
- 1.31. **EMB** agreed, explaining that there is a gap in the TPP community. **EMB** wanted to know what the assurance is that TPPs are following the proper conformance from a technical perspective – are they pledging to the standards and specifications? **EMB** explained further that there have been examples of major TSPs acting as ASPSP and AISP, providing services while onward provisioning is not properly implemented.
- 1.32. **HP** was nervous about the insinuation that regulated firms are acting irresponsibly and in the absence of specific evidence to support this, then this conversation should not continue.
- 1.33. **RR** asked - if there is a risk to customers, is it the business of IESG / Open Banking to police and manage the risk? **GL** stated that the purpose of this forum is to ensure that the ecosystem accounts for orchestrating things that eliminate consumer risk – such as customer redress and dispute resolution. As the regulated body that is delivering this capability, **GL** thought that it was right for Open Banking to get involved. **RR** submission was that if the issue was with a non-CMA9 bank who were not compliant, then it is up to the bank to sort the problem out.
- 1.34. **GL** wanted to make the simple point that all parties should be conformant as it is good practice, reduces risk, engineering costs and has the scrutiny of the global community looking at threat assessments and vulnerabilities in the API structures which are skillsets not possessed by individual firms.
- 1.35. **CM** suggested that this is the wrong forum for this conversation but it is a relevant discussion. **CM** went on to explain that he would like to see security experts involved in this conversation, it is the job of OBIE and the collective organisations to get this right as there are risks attached to non-conformance. **CM** proposed to take this offline.
- 1.36. **IG** clarified scope, stating that nobody is disagreeing with the fact that this is an important element and due attention is required. **IG** explained that the reason why there is misunderstanding with regards to where the scope for this lies is that in order for the Trustee to meet obligations under the Order, a standard has to be created and this has to be open. **IG** explained that ‘open’ means that it can be used by any party within the ecosystem, whether within the UK or outside. In order to ensure that the standard is easy and convenient to comply with, **IG** explained that conformance tools were introduced – these are made available to all participants in the ecosystem, including TPPs and non-CMA9 ASPSPs. **IG** deemed this an entirely appropriate way of doing things. **IG** went on to explain that the remit of the Order and the Open Banking Implementation Entity is to monitor only the CMA9 and not the TPPs or the non-CMA9 ASPSPs. **IG** explained that it is also not the remit of the Trustee and the OBIE as a mechanism of the Trustee to require or mandate any remedial action outside of the non-CMA9 as this is a matter for other regulators (predominantly the FCA as it relates to the PSD2 and also the ICO). With regards to views and opinions that are substantiated, **IG** thought it appropriate for IESG via the Trustee to communicate them up to the regulators, but described speculation without substance as to whether or not there are other issues as an overreach by this entity. **IG** did not want to be in a position where views or positions from the appropriate regulators for those entities became undermined or conflicted. **IG** stated that this had been a healthy conversation, however, boundaries need to be respected and if there is confidence that the tools are in a good position, this is an on-going evolution and how they work in practise can be demonstrated, it is within the remit of OBIE to work with the CMA to obtain conformance with these tools, then they can be made available, including the lessons learnt.

- 1.37. **SMD** agreed with **IG**'s points, explaining that the ICO would welcome any submissions / observations via the Trustee about any concerns regarding structure and detail. In this case, **SMD** stated that the FCA is better suited to this, but as an approach, **SMD** stated that the ICO would be supportive.
- 1.38. **IG** drew a line, stating that the take away is that there is consensus that conformance is important, despite varying reasons why adherence to the conformance tools is important and the Roadmap has a definitive place for reviewing conformance for the CMA9 and a mechanism for taking action where conformance has not been met.

## 1.c.ii CMA9 STATUS REPORT

- 1.39. **IG** moved on to slide 29, reminding IESG members that this is a CMA9 submission. **IG** asked **EC** to give an overview, after which the floor would be opened up for questions and comments.
- 1.40. **EC** explained that some firms are still under directions.
- 1.41. **EC** went on to provide key updates since the last IESG - Cater Allen have made some strides forward as they passed functional conformance testing previously and are now in the latter stages of a managed roll out validation for AIS, PIS will follow shortly. In terms of customers on the platform, **EC** stated that they have migrated from a legacy platform to a new platform, which includes the Open Banking functionality – there is one more tranche in Q2. From an OBIE point of view, **EC** stated that there is a detailed plan that sits behind that that is being actively monitored.
- 1.42. With regards to the other Red items, **EC** explained that these relate predominantly to 3.1.4, and the submission of detailed plans (and P7 in particular).
- 1.43. **EC** stated that there are a couple of firms that have no detailed plans and others are awaiting the outcome of the Roadmap before they confirm their plans.
- 1.44. **IG** expressed disappointment at there being so many Red statuses and P7 seemsto be the driver of some or all of these. **IG** explained that there have been a few conversations in the bilaterals with some of the CMA9 about P7 and wanted to take this opportunity to make a couple of points / observations. **IG** stated that there was some confusion about whether P7 is actually a mandatory requirement under the Order. **IG** stated that it is and this is regardless of the Roadmap because the implementation of this was agreed prior to the Roadmap consultation, adding that the Roadmap reflects on-going and new activities. On this basis, **IG** explained that if a CMA9 member is choosing not to implement P7, they are essentially at risk that it will not be approved as part of the Roadmap. To be clear, **IG** added that the clock has started for P7 and it is reflected in the proposed Roadmap. **IG** stated that it could be removed from the Roadmap (in which case it no longer is mandatory), however, the assumption should be that it will remain on the Roadmap. With regards to the confusion about whether it was made clear to the CMA9 that P7 was a mandated item, including the timing for that, and **IG** took the opportunity to read an item from the minutes from the November 2019 minutes which was approved and published in December 2019. **IG** read out the extract as follows:  
*APPROVAL – IESG\_APR\_LOG\_059 - P7 (Reverse Payments) - This functionality is approved to be included in version 3.1.4 of the Standard (due for publication on 23 Dec 2019). Option A should proceed, implementation will be mandatory for the CMA9, with implementation completed six months from the publishing date of the standard.*
- 1.45. **IG** was unsure as to why there was potential confusion as to this item being a mandatory requirement and requested that any further confusion around this, or if clarity is required, that this could be picked up offline.
- 1.46. **IG** opened the floor to comments. There were none.
- 1.47. **IG** explained that there is another aspect of reverse payments that has nothing to do with whether or not it is an implementation requirement of the Order, it is to do with questions around data; this has been raised by two of the CMA9. **IG** handed over to **AA** as it is a bit technical, but the team has worked with the ICO on this and have

written to the relevant CMA9. **IG** asked **AA** not to be conversation specific, but to draw out broad high level observations that might clear up any potential questions that other CMA9 members might have.

- 1.48. **AA** explained that the core question from ASPSPs is around whether they are being transparent with their customers specifically relating to sharing of account details. **AA** explained that the OBIE view (supported by the ICO) is that the appropriate place to make a customer aware of various data sharing issues is within the privacy notice. Looking at some of the notices, **AA** stated that it appears to be called out specifically or in general terms within the detail of the privacy notice, however, the general view of the OBIE and the ICO is that this could be covered within the details of the privacy notice. **AA** stated that repeatedly advising the customer that this is going to be shared might inadvertently confuse the customer; especially where this advice is given for certain journeys but not others (which are covered within the privacy notice). **AA** stated that in effect, this could go against the principles of GDPR because of confusion. **AA** informed IESG that another point that has been raised is the lack of contract between the PISP and the ASPSP. **AA** stated that this is particularly important because PSD2 replaces that, but this is not governed by PSD2. **AA** explained that from an OBIE point of view, the privacy notice is the appropriate place to cover that; therefore, that point is not particularly relevant in this case. **AA**'s third point which he pointed out was particularly important to OBIE is that it amounts to a replay of consent within the terms of PSD2, but also, this is contrary to what has been written down in the Customer Experience Guidelines. **AA** reiterated that the shared view between the OBIE and the ICO is that the appropriate place to make a customer aware of the data being shared is within the privacy notice and that most privacy notices currently cater for that already. **IG** stated that the any questions on refunds, particularly as they relate to whether they are an implementation requirement or not can be answered by the OBIE team; as well as questions around the overlap with GDPR. **IG** hoped that this might help to provide transparency on the CMA9's delivery against refunds, thereby turning some of the Reds to Amber if not Greens.
- 1.49. **FR** queried some of the thoughts around privacy notice from a usability and understanding point of view. **FR** explained that whilst she was not advocating for any specific position on this (as not fully aware on specifics), she wanted to request that the OBIE meet with the PSR to ensure that all considerations have been taken on board, given the authorised push scam work or the consideration that consumers should know how their account number and sort code are dealt with. **FR** added that putting information in privacy notices basically means that nobody will read that, meaning that the consumer will not be aware. **FR** added that this shows a short coming in the way complex issues are explained to consumers.
- 1.50. With regards to the privacy notice, **RR** stated that in the concept of an AISP, it is made clear upfront to the customers that they are consenting to do something on a permanent, 90 day or on-going basis, and they then decide whether or not they want to see the details. However, **RR** was of the opinion that the actual '*you are consenting to...*' is prominent and the retaining of sort code and account number in the PISP journey crosses the line from stating that no data is being retained on an on-going basis to saying that this data is being retained for a period of days, weeks, months. **RR** thought on that basis that the data privacy should require more thought.
- 1.51. **FR** thought that there was more work to be done with ICO on helping merchants understand how they can protect and store information as the comparison with cards on file is that upon purchase, the long card number is stored, but the consumer protections are different for PIS which is where the issue arises. Separately, **FR** wanted IESG members to note that the supporting network of codes and requirements for merchants involved in card payments that is also different as there are no such codes or requirements for PIS; the only thing required is a contract between the merchant and the PIS, therefore, there is some work that can be done by OBIE and the ICO to put in place guidance on provisions for the contracts (PISPs and merchants), definitely some guidance from the ICO on what merchants should do, how they should store this information, how should they store it separately, including names and address
- 1.52. **SMD** explained that three areas have been discussed:
  - 1.52.1. Lawful basis of obtaining consent;
  - 1.52.2. Principles of transparency; and
  - 1.52.3. Principles of security.

**SMD** explained that these three principles are important, but different. **SMD** added that there are questions around what parties are responsible for the disclosures that need to be made within the data protection world vs. making sure that people understand. **SMD** stated that the ICO hold these in high regard but they go beyond compliance. From **SMD**'s point of view, there has to be clarity on when it is a straight compliance issue that can be nailed by citing an aspect of the Data Protection Act 2018 vs. what good looks like.

- 1.53. **FR** stated that this is a justifiable response, but explained that there has been a lot of push back on reverse payments, therefore there needs to be consideration about how a wraparound (not necessarily OBIE) is delivered. **FR** wondered if this is something UK Finance would take forward or if it could be considered as part of the TPP Guidelines.
- 1.54. **IG** explained that the way to bridge these two discussions is to note that there is a big issue around the information that banks have, and share with other parties that are not known to the OBIE or would be known if the privacy notice was fully understood. **IG** stated that it is an enormous issue that involves credit reference agencies, marketing agencies, etc. which cannot be tackled at this forum. **IG** stated that the OBIE was reacting to unnecessary friction in the replay of consents in a customer journey; if customers are going to use a refund functionality, it has to work well for them. **IG** stated further that the CEG as part of the Standards have to be complied with, adding that the OBIE is helping banks (the CMA9) to understand what they ought to do from a compliance perspective in order to adhere to the Customer Experience Guidelines. **IG** explained further that this important approach sits within the remit of what the entity is trying to achieve. More broadly, **IG** stated that someone should be looking at the information shared by the banks, but it is not within the narrow confines of the activities being undertaken here. **FR** explained that there this is a specific use case – the sort code and account number gets passed on to a PISP who may or may not pass that on to a merchant to facilitate a refund. **FR** said that making the consumer aware of this is the point that has been raised by the bank. **FR** appreciated the fact that there are onward sharing issues but stated that she is referring specifically in this PIS journey and the remedial actions, which whilst not required by compliance, from a consumer point of view, these are important. **IG** responded by stating that if that is the approach, **FR** needs to take a step back and think about all the situations in which sort code and account number are shared by banks, aggregate them all, identify which parties they go to and then understand what kind of regulatory requirements sit around that.
- 1.55. **SMD** expressed a need to ensure that the FCA and ICO are aligned in all conversations regarding this.
- 1.56. **CM** pointed out that in the CEG (which IESG members all contributed to), it has been clear regarding the recommendations for TPP or PISP side about what the PISP should be clear about, such as what data is being collected, purpose, etc. **CM** stated that there are references to guidelines from the ICO on GDPR requirements. **CM** added that there is on-going work around whether the TPP guidelines are clear enough in these areas. **CM** thought the conversation was about what, if anything, needs to happen to the ASPSP side in the flow. **FR** explained that the reason for the ASPSP question is ultimately a consumer question as even though there are different sides, it is one journey for the consumer.
- 1.57. **IG** stated that questions on refunds should be brought directly to the OBIE for support, adding that the OBIE's position will be reviewed, ensuring that customer security is maintained / ensured as it relates to P7. **IG** specifically mentioned questions as particularly relating to:
- 1.57.1. Is this an implementation requirement or not? (the OBIE believe it is and can provide the support needed internally to move that forward); and
  - 1.57.2. Questions around the overlap with the GDPR (the OBIE has done some thinking on this and can provide support to overcome that hurdle).
- 1.58. **GL** was interested in a perspective on the reason for the Amber status for Barclays RJID as the templates for customer experience RJID are a year old now, therefore the customer interface which should be quite simple to fix and should be complete by now. **IG** explained that the OBIE team are liaising directly with Barclays on this.

## 1.c.iii KEY PERFORMANCE INDICATORS (KPI's)

- 1.59. **IG** moved on to the KPIs, informing IESG members that the information is in the pack, transparent and on time and did not think a long discussion was warranted. On that basis, **IG** invited **EC** to give a high level input.
- 1.60. **EC** stated that on the main metrics, API availability is slightly up as an improvement to the trend; however **EC** thought that it was liable to the top out to the 99% level if the aggregate level across all the banks is looked at.
- 1.61. In terms of average API response times, **EC** informed IESG members that it is slightly worse, but this is because a number of the banks had significant performance problems, but are now recording material improvements, so overall, even though it has bounced back to something that is marginally worse than prior months, the improvements are significant. With regards to the growth from some of those banks, they are outstripping what they were doing in terms of growth of consumers and API calls. **EC** explained that it is not an absolute correlation between the two, but there is definitely an improvement in response times and overall growth from those banks.
- 1.62. In terms of the successful API calls, **EC** commented that there is a slight improvement recorded as a number of the more systemic technical and business failures have begun to improve, albeit there being a bit more work to do on that in terms of trying to bring this back down to a small percentage.
- 1.63. **EC** had an ask with regards to the presentation on the web – the failed technical business is reported in absolute numbers, however, **EC** thought it would be more helpful for the industry who look at the API's if this is moved to a percentage. **EC** explained that this would not be to take away the actual percentage, but to ensure that the individual rates can be determined because the absolute numbers creates the impression of a worsening situation when in reality, the reverse is the case.
- 1.64. **IG** was happy to take comments offline, but expressed that he was struggling to reconcile the fact that broadly speaking, it looks like there is a level of stability being attained, however, individual TPPs are lobbying the OBIE often referring to specific issues with specific CMA9's; issues which are not being reflected in these numbers. **IG** stated that this will not be addressed now, but on the revised Roadmap going forward, this will be discussed, particularly with the performance improvement plans where they are relevant to specific banks or brands. **EC** explained that these issues do not tend to relate to complete outages or performance problems by any of the banks, but are quite specific to the TPPs in question. **EC** recognised that when looking at the detail, those are specific issues.
- 1.65. **SW** drew attention to the information on slide 48 (*authentication efficacy*). **SW** stated that this is the first time this has been provided and the figures do not correlate to what was provided by RBS and requested a follow-up conversation to go through it as UBN is not 8% success. **IG** stated that this would be rectified.

***ACTION - IESG\_2020\_301\_444 - Programme Update - KPI's - Authentication Efficacy - MI team to amend the information reported for RBS.  
10 March 2020***

- 1.66. **JG** drew attention to the information on slide 46 (*Payment adoption*), stating that a number of payments have completed successfully and wanted to know if total number of attempts is collected or just number of payments successfully completed. **EC** explained that it is total attempts. **IG** stated that there will be further analysis on this will be done as part of the PIP point.

## **2.a IESG SCREEN SCRAPING MIGRATION AND EIDAS IMPLEMENTATION**

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- 2.1. **IG** stated that the FCA is essentially on point for steering on the adjustment period are not present at the meeting, however, **IG** requested a high level description of the paper from **EC**.
- 2.2. Regarding issues, **EC** commented that these are usually not specific to individual TPPs, some are owing to the fact that they have not onboarded properly, whilst others would be nuanced to the data, relating to a particular TPP rather than TPPs in general. **EC** stated that the CMA9 have done a good job of reaching out to, in particular, the

TSPs that are involved in these who are either regulated or providing access through. **EC** added that the overriding observation is that with a couple of exceptions, they are all late - a number of TPPs have only just started sizeable migrations over the last couple of weeks. **EC** added that preparations have been in progress and some of the migration activities are underway, however, the numbers that have not started still represent a high percentage of consumers.

- 2.3. **IG** confirmed with **EC** that this is the official message that would be provided to the FCA and the OBIE will continue to work efficiently and effectively to support the TPPs.
- 2.4. **EC** explained that a small number need to finish this, with majority well underway. **EC** explained further that for the few exceptions to this, the firms in question know what they need to do and so do the FCA. **IG** stated that the OBIE and the CMA9 are doing as much as is reasonable, adding that without speaking for the FCA, the communication so far has been that the deadline for the adjustment period will not move. **IG** stated that it feels like it might be tight to get some of the TPPs over the line.
- 2.5. **GL** advised IESG members that he had a more nuanced response from the FCA with regards to the adjustment period – there will not be a new line in the sand, but they would move to more direct supervision of each firm to ensure that the migrations complete. **GL** stated further that the basis of the adjustment period was for the APIs and all of the requirements were finished and a period for TPPs to migrate; most of the issues have occurred are technical issues on the ASPSP side. **GL** stated that the question to the FCA is what happens when ASPSPs have:
  - 2.5.1. Got no modified customer interface (TPPs were not campaigning for this, but it is a requirement); or
  - 2.5.2. When new SCA is introduced, forcing firms to cease screen scraping at a period where the APIs are not quite fully functional.**GL** stated that perhaps the regulator might introduce a case-by-case adjustment to the adjustment period in relation to screen scraping access.
- 2.6. **IG** did not want to speak on behalf of the FCA's position, referring to the discussion as a helpful reflection. **IG** stated that OBIE and the CMA9 should do everything possible to get the TPPs moved over within this period of adjustment and not assume that there will be an adjustment or case-by-case adjustment so as not to deprioritise anything that is being done at the moment. **IG** used this opportunity to encourage CMA9 to come to Trustee or **EC** directly with specific thoughts and initiatives that can be used to streamline this overall process.
- 2.7. With regards to the consumer aspect of this, **MCH** mentioned that he was in a meeting where there was a reference to attrition - consumers losing service which they are entitled to rely on and expressed surprise that these difficulties exist for TSPs, TPPs or any or anyone as the attrition will have a bad outcome for some business consumers. On that basis, **MCH** stated that this should not be viewed as a technological glitch leading to an attrition, but to customers of businesses (CMA9 ASPSPs, non-CMA9 ASPSPs or TPPs) losing potentially critical services. **MCH** added that the FCA is aware; nobody understands the exact scale, suffice it to say that it is potentially significantly. **IG** stated that the team have worked hard to understand the problem, including working with individual firms and TPPs. **IG's** understanding is that a lot is down to communicating with their customers and trying to create multiple journeys as opposed to technology. **IG** added that a lot has been done to identify the particular firms.
- 2.8. **HP** explained that there is a risk that the transition from screen scraping to PCD compliant method of access is perceived as the reason why some services will cease, but in fact, some firms are saying that business models have not been profitable or effective and are therefore not willing to invest in and making that transition as a commercial choice. **HP** added that HSBC is expecting to deprecate version 1 end points that were launched in January 2018 by the end of March 2020 and one PISP has candidly stated that they will not be moving up to version 3 because they are not making any money out of this and they do not strategically think that it is in their interest to invest engineering time. **HP** explained a further risk that what is being said in the market is misunderstood, customers may lose that product but this is not driven by PSD2 or anything being done in the ecosystem, but by the commercial choice of the firms.

- 2.9. **GL** explained that these issues are AIS – firms with big installed customer bases with a lot of data to migrate from screen scraping and in some cases, there is the issue of:
- 2.9.1. how quickly they can take the customer along
  - 2.9.2. scope is not determined; and
  - 2.9.3. some of the ASPSPs internal technical issues have prevented a transition.
- GL** stated that this is a complicated situation, and that if a path is not figured out, unfortunately, the loser is the customer.
- 2.10. **IG** understood the frustrations and explained that work has to be done within the parameters that have been set; however, **IG** concluded that he is always open to new ideas.

## **2.b CUSTOMER EVALUATION FRAMEWORK (CEF)**

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- 2.11. **IG** introduced the paper for noting, inviting **AA** to give a brief overview of agenda items 2.b (*Customer Evaluation Framework – CEF*) and 2.c (*Proposal for Consumer Risk Monitoring for Open Banking*).
- 2.12. **AA** stated a consultation paper will be going out soon on the Customer Evaluation Framework, which will be followed by a Round Table. In terms of streamlining, **AA** stated that more will be seen on this paper.
- 2.13. **IG** asked for confirmation that this Round Table has been scheduled for 04 March 2020 and indication of attendance, asking if people need to be chivvied.

## **2.c PROPOSAL FOR CONSUMER RISK MONITORING FOR OPEN BANKING**

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- 2.14. **AA** stated that this proposal is to set up an end user committee, adding that ideas for what goes into this paper have been discussed so that things that are brought forward to IESG from this committee are actionable and in scope of the Order. **AA** explained that the committee is hoping not to lose sight of other industry wide issues, but understand that IESG cannot necessarily action those.
- 2.15. **AA** explained that an idea has been set out here on how the end user committee should be constituted and nominations for membership will be sought.
- 2.16. **FR** added to the conversation by stating that a paper has been developed jointly with **CA** and it has been reviewed by **GL**. **FR** stated that the next phase is to work out what a risk log would look like with a group of people who are keen to pursue it. **FR** informed IESG members that there is a draft risk log being reviewed, with format being decided upon.
- 2.17. **JG** asked in terms of timing, how this works in parallel with the current governance model transition. **FR** explained that this refers as much to the Customer Evaluation Framework as the Risk Log proposal, hence the frustration with trying to differentiate between the models whilst trying to progress with a strategy for Open Banking which has not been replicated in any of the materials that have been put forward by UK Finance. **AA** explained that this fits within the current governance structure as the future state is unknown. **JG** asked if it is part of the Trustee's monitoring function, to which **AA** replied that it is not.
- 2.18. **IG** explained that he would appreciate input on the categorisation of risks, adding that the team spent time trying to figure out the various groupings – e.g. actionable risks, risks of unintended consequences, etc. **IG** asked for feedback via **AA** who can co-ordinate. **IG** stated that the aim is for progress ahead of the next IESG on 24 March 2020.

## **2.d REVISED ROADMAP – CONSULTATION UPDATE**

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- 2.19. **IG** stated that this has been discussed in varying detail and now resides with the CMA. **IG** added that the CMA are accepting views from all participants (deadline is close of business 26 February 2020).

- 2.20. On the timing, **BR** pointed out that this is a slightly different consideration to previous versions of the Roadmap because, whilst some obligations of the Order will persist, others will be discharged. **BR** added that the CMA asked for the Trustee to set this out in the status report, including the proposals for taking the entity to the end point for some of the implementations; therefore there is a need to be very careful with how the proposals are dealt with. **BR** reiterated that the deadline for final comments on the Roadmap is close of business today (26 February 2020). **BR** explained that some firms are yet to submit and the CMA needs to go back to others where there are requests for meetings or more information. Being realistic in terms of duration, **BR** stated that the CMA is looking at collating information until the third week of March 2020, and a decision should be made shortly after that.
- 2.21. **IG** was hopeful that by the next IESG meeting on 24 March 2020, the Roadmap will be agreed.
- 2.22. **FR** referred to the minutes of the last IESG meeting on 16 January 2020 where the difference between work being done on the revised Roadmap and the work that is being done by UK Finance on the future governance of Open Banking, noting that new ideas or improvements to Open Banking may have been identified, however, these remained outside the remit of IESG; they were best left to the future Open Banking Steering Group. **FR** wanted to highlight that as far as she is aware, there is no consumer representation on that steering group even though suggested names had been put forward (they have not been contacted). **FR** was of the understanding that UK Finance has a consumer advisory panel, but they have neither been formally made aware of this work nor been invited to a separate meeting about this and have only received will receive an agenda quite late in the process at a time when it is much harder to influence. **FR** stated that the Consumer and SME representatives have tried to facilitate something with Accenture to give consumer organisations the opportunity to hear about the work and they these organisations were under impressed by the level of engagement that they had on this piece of work. **FR** stated that she has heard different reasons why consumer representation is not needed on the UK Finance Steering Group and wanted to minute the fact that it is a concern to her that in the future of what should be a remedy designed for consumers and what should be an industry initiative designed for consumers, that there is no mention in the draft outcomes or target operating model about what the consumer outcome should be, the purpose for individuals, consumers, society, businesses, etc. **FR** emphasised that it is a massive jobs in terms of the fact that this is delivering peoples highly sensitive personal data, making it available through Open Banking or Open Finance. From a consumer point of view, **FR** stated that the regulatory lines are blurry, but the important thing is that their consumers' personal data is being made available through the infrastructure. **FR** stated that Open Banking, Open Finance, the future governance are really important for consumers as well as industry. **FR** expressed concern that despite the many weeks and opportunities that have been provided to UK Finance, these have not been taken up, and still there is no consumer representation on the group.
- 2.23. **IG** turned to **PM**, stating that this might be a good time to update on the UKF future of Open Banking work, to which **FR** requested a response from **BR** as well because this has regulatory backing – the CMA, FCA, Treasury, BEIS all sit on this group and yet there is still no consumer representation, despite it being mentioned at every meeting.
- 2.24. **IG** stated that **BR** has been quite clear on the regulatory status of this initiative but asked if he wanted to comment. **BR** explained that the Accenture exercise is to help UK Finance develop a set of proposals (may be one of several) which will be put to the CMA who will consult with whomever they deem appropriate. **BR** explained that the CMA sit on this group with an 'observer' status and UK Finance has been told of the importance of ensuring that all stakeholder views are represented, including consumers, even if they are reached out to through other means. **BR** stressed that this is a UK Finance initiative, which the CMA will consider and consult with a wide range of stakeholders on what would be good next steps in terms of what would be oversight of the Open Banking ecosystem.
- 2.25. **PM** stated that clearly there is a problem to fix and UK Finance will do its best to speak to **FR** and consumer groups to engage. **PM** stated that a set of proposals are yet to be issued by Accenture, and there remains an opportunity for people to give their views and for UK Finance to work with Accenture to develop the proposal. **PM** explained further that efforts have been made to engage consumer groups within the steering committee and expressed a keenness to engage, adding that they are open to any practical suggestions on how this can be accomplished. **PM** stated that he would take this offline with **FR**.

**ACTION - IESG\_2020\_301\_446 – Roadmap Consultation Update – PM to engage with FR offline about consumer representation on the future of Open Banking Steering Group.  
Due Date – 24 March 2020**

- 2.26. In terms of a more general update on the work, **PM** advised IESG members that Accenture has been engaging widely with firms outside of the Steering Group and a defender model has been produced with some challenges; they are seeking feedback on some questions, with the intention being to issue a draft proposal for written feedback. **PM** stated that **FR** and **MCH** will be in receipt of a side copy tomorrow (27 February 2020).
- 2.27. In terms of headlines, **PM** explained that the intention is that there are broad agreements that:
- 2.27.1. The services and functions of Open Banking should continue as they are highly valued;
  - 2.27.2. The capability to extend the use of those services and functions for commercial and regulatory mandates that may emerge in the future from Open Finance should continue;
  - 2.27.3. The entity itself should be governed by a board that is representative of end users within it as well – there are proposals about that detailed within the latest deck.
  - 2.27.4. With regards to the governance in the end state operating model as opposed to the governance in the OBE is that it is not dominated by the Order, therefore there will not be a strong representation by the CMA9.
  - 2.27.5. There will not be an implementation Trustee
  - 2.27.6. The monitoring function would be on the CMA9 as consistent with the Order and not on the entity itself.
  - 2.27.7. The regulation will be on the firms as opposed to Open Banking limited.
- PM** stated that feedback on the above is welcome.
- 2.28. **IG** wanted confirmation of timing. **PM** explained that a request for written feedback will be issued tomorrow (27 February 2020). **PM** added that a Steering Group had been scheduled for 09 March 2020; however, feedback suggests that this is moving with too much pace; on that basis, this has been delayed to give people the opportunity to consider the proposals and provide feedback. **PM** advised IESG members about a feedback form that will be distributed with the deck that allows people to be precise about issues they want to challenge.
- 2.29. **PM**'s final point was that this organisation will be '*not for profit*'; there are questions raised about the potential of undertaking some commercial activities with surpluses generated.
- 2.30. **IG** asked for confirmation of the end date for providing the Accenture / UK Finance Report. **PM** did not want to be drawn on this just yet, stating that this will follow the revised Roadmap; however this is more likely to be April, depending on the amount of feedback received and degree of issues requiring attention.
- 2.31. **IG** concluded by stating that this is an initiative in process and will be made as open as possible to all across this table. **IG** also reiterated the action for **PM** to engage with the Consumer and SME representatives.

### **3.a AOB – SME CONSUMER FORUM HELD IN EDINBURGH – DEBRIEF**

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- 3.1. **MCH** informed IESG members that he attended an SME forum in Edinburgh at the end of January 2020, comprising of about forty representatives of various FinTechs and wider ecosystem members and a number of organisations who represent small businesses. **MCH** explained that this is the first time that the issue of what Open Banking can do for small businesses was addressed as in the past, the tendency had been to focus on particular topics, such as late payments and productivity.
- 3.2. **MCH** mentioned two take-away points for IESG information:
- 3.2.1. A positive vacuum into which we can find a way to feed in positive messages in the right way - the awareness (or lack of thereof) of Open Banking was discussed at some length and on the second anniversary of Open Banking from January 2018, there were a number of things that were put out in the press, indications that there is a clear gap in terms of effectively communicating positive things that Open Banking can do generally and for small businesses in particular. **MCH** explained that a lot of interesting ideas emerged about not selling Open Banking, but demystify what people are already doing in terms of sharing their data in a more secure fashion. **MCH** hoped

that this would enable continuation of existing propositions, but also the development of further and better propositions.

3.2.2. A negative message - due to the fact that representatives of TPPs in the room are heavily invested in the project, they felt concerned about the latest hiatus following the Roadmap coming to an end and the question was whether the regulators and government departments involved were really pushing this forward effectively as a competition remedy that would ultimately work in the consumer interest. **MCH** stated that a lot of people were expressing legitimate concerns about this.

- 3.3. IG appreciated the observations. IG stated that the Roadmap holds a lot of what is required to get the job done, adding that the CMA will be taking views from all stakeholders into consideration. **IG** thought that maybe some of the Fintechs will make their representations known.
- 3.4 **IG** thanked IESG members in the room and on the phone.
- 3.5 **IG** closed the meeting.