

**OPEN BANKING**

# **eIDAS certificates consultation webinar**

**Tuesday 15<sup>th</sup> September  
10am – 12pm**

Contact [comms@openbanking.org.uk](mailto:comms@openbanking.org.uk)  
with any questions based on  
this material.

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## Context

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- EBA statement of 29<sup>th</sup> July:

“...Furthermore, account information service providers (AISPs) and payment initiation service providers (PISPs) registered/authorised in the UK will no longer be entitled to access customers’ payment accounts held at the EU payment service providers and **their PSD2 eIDAS certificates under Article 34 of the Commission Delegated Regulation (EU) 2018/389 will be revoked...**”

- This statement also reminded Financial Institutions that passporting into EU from UK would not be permitted after Brexit
- Simple objective: minimise disruption to ecosystem (end users and participants)
- Approach: regulatory change to allow alternative certificates (FCA proposal) + technical changes to Directory (if required)
- FCA proposal published on 4<sup>th</sup> September, requiring responses by 5<sup>th</sup> October

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## ASPSP Survey Summary

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### ASPSP Survey 1 (34 firms)

ASPSP eIDAS Survey 1	Number (of 34)	%age
TPP id via eIDAS	30	88%
TPP id via OB Cert	26	76%
Accept QSEAL signing	24	71%
Accept OB cert of other keys signing	29	85%
Unlikely to require PSU re-auth for AIS	9	26%
Possible best-case migration*	29	85%

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## ASPSP Survey Summary

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### ASPSP Survey 2 (30 firms)

#### TPPs onboarded

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TPPs onboarded using eIDAS	124		
TPPs onboarded using OB/Other certs	1221		
eIDAS	12 / 30	40%	
OB/Other	17 / 30	57%	

#### Preference for TPP ID

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OBWAC	28 / 30	93%	
OBSeal	18 / 30	60%	
OB Legacy Transport	21 / 30	70%	
OB Legacy Signing	13 / 30	43%	
Other	4 / 30	13%	

#### Preference for message signing

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OBSeal	26 / 30	87%	
OB Legacy Signing	21 / 30	70%	
Other	6 / 30	20%	

#### Time to implement all TPPs using OB certs

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Immediately	15 / 30	50%	
1 month	7 / 30	23%	
3 months	4 / 30	13%	
6 months	1 / 30	3%	
longer	3 / 30	10%	

#### Time to implement UK TPPs using OB certs

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Immediately	11 / 30	37%	
1 month	4 / 30	13%	
3 months	7 / 30	23%	
6 months	3 / 30	10%	
longer	5 / 30	17%	

#### Impact on PSUs

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No need to re-authenticate	17 / 30	57%	
Shorter re-authentication required	3 / 30	10%	
Full re-authentication required	10 / 30	33%	

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## OBIE Directory Update

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These slides detail the possible impact of the changes and OBIE's options to support these via changes to the Technical Directory.

1. Target state
2. Impacts on ASPSPs
3. Technical Directory options

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## OBIE Directory Update

### Target state

TPP	Permission to operate in UK	Permission to operate in EU	TPP can issue OBIE certificates	TPP can create S/W statements
UK TPP with eIDAS	Allow	Deny	Yes	Yes
UK TPP without eIDAS	Allow	Deny	Yes	Yes
EU TPR TPP with eIDAS	Allow	Allow	Yes	Yes
EU TPR TPP without eIDAS	Allow	Deny	Yes	Yes
EU non-TPR TPP with eIDAS	Deny	Allow	Yes <sup>1</sup>	Yes <sup>2</sup>
EU non-TPR TPP without eIDAS	Deny	Deny	Yes <sup>1</sup>	Yes <sup>2</sup>

### Recommended changes

1. Restore ability for TPPs to create software statements regardless
2. Add new endpoint for advanced validation service to allow ASPSPs to check certificates and permissions in a specific market

### Notes to table data

1. There is no value in preventing this operation. It would be the responsibility of non-UK banks to use eIDAS certificates only and effectively the OBIE certificates will not be useful.
2. It is assumed that the requirement for having an eIDAS certificate as a prerequisite will cease to exist in the UK. This has not been a requirement in the EU (as they must only use eIDAS certificates)

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## OBIE Directory Update

### Impacts on UK ASPSPs

#### Assumptions:

- TPPs may use OBIE certificates to identify themselves
- TPPs do not need an eIDAS certificate to identify themselves

#### Approach:

- While onboarding a TPP, ASPSPs must check if the TPP has permission to operate in the UK:
  - The `organization_competent_authority_claims` claim in the software statement determines the NCA and the `authorisations` field within the claim provides additional information
  - ASPSPs that do not use DCR can use the SCIM endpoint to find this information about the TPP
- When identifying a TPP the ASPSP can rely on the use of an OBIE certificate
  - It could additionally call the SCIM endpoint to reverify the organisation and software statement

### Impacts on non-UK ASPSPs

#### Assumptions:

- TPPs should only use eIDAS certificates to identify themselves

#### Approach:

- While onboarding a TPP, ASPSPs must check if the TPP has permission to operate in the ASPSP's member state:
  - The `organization_competent_authority_claims` claim in the software statement determines the NCA and the `authorisations` field within the claim provides additional information
  - ASPSPs that do not use DCR can use the SCIM endpoint to find this information about the TPP
- When identifying a TPP the ASPSP can rely on the use of an EIDAS cert. They must not accept OBIE certificates
  - It could additionally call the SCIM endpoint to re-verify the organisation and software statement
  - TPPs that have created a software statement will not be able to transact unless they have an eIDAS certificate to identify themselves

### Technical Directory options

To support the ecosystem to accommodate the changes expected as a consequence of the EBA's announcement, OBIE is considering four options, detailed in the following slides.



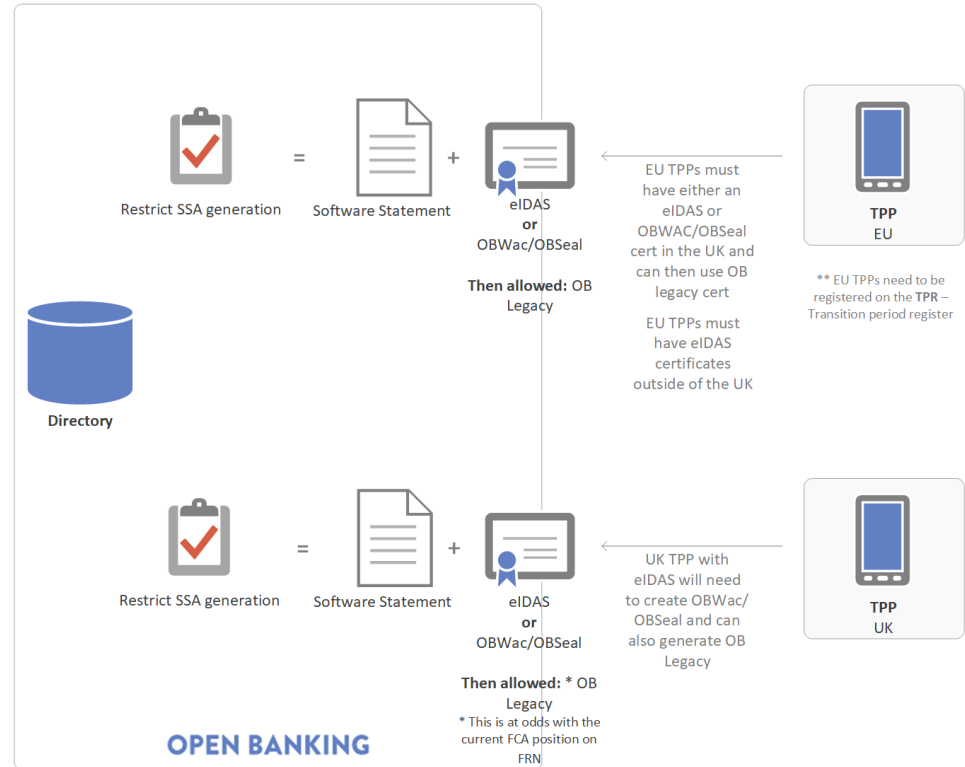
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## OBIE Directory Update

### Option 1: OBWAC & OBIE legacy certificates used instead of eIDAS

#### Description

- UK TPPs could upload eIDAS certificates to the Directory and then use OBWAC or OBIE legacy certificates depending on the ASPSP
- UK TPPs can have an OBWAC and can then use OBIE legacy certificates
- EU TPPs must upload an eIDAS certificate to the Directory or create an OBWAC/OBSeal in the UK and can then use OBIE legacy certificates
- EU TPPs must have eIDAS certificates outside of the UK
- The above restrictions are implemented primarily on the software statement assertion (SSA) generation, making it unavailable without the correct certificates, so that software statement functionality remains available for the uploading of the required certificates



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## OBIE Directory Update

### Option 1: OBWAC & OBIE legacy certificates used instead of eIDAS

#### OBIE Impact - Cons

- Agreement is required by the FCA that OBIE legacy certificates can be used once the TPP possesses eIDAS or OBWAC certificates
- Significant cost in development effort
- Some risk of the solution not being available by 1<sup>st</sup> Jan 2021
- Paragraphs 3.8 and 3.9 of the FCA consultation require the certificate used for identification to include the FRN. OBWACs and OBSeals would meet this requirement, but not OBIE legacy certificates. Their consultation is not aligned with our view that TPPs that have an OBWAC/OBSeal can then use an OBIE legacy certificate.  
The FCA would have change their direction to support this option.
- We need to be certain that the new rules around certificate validation have been correctly analysed. There is a risk of incorrectly locking out TPPs.
- Given the uncertainty which is likely to continue until late 2020 this option presents a risk of wasted effort or introducing a change that is at odds with the final position of the FCA
- Checks and balances through SSA are only available to ASPSPs that use DCR

#### ASPSP Impact - Pros

- Validation provided by OBIE to ensure that TPPs cannot onboard if they do not possess the appropriate certificate where ASPSPs use DCR
- Manual validation supported via API or Directory Frontend Interface where ASPSP registration is manual via a Developer Portal
- No change for OBIE-contracted ASPSPs
- From the 1<sup>st</sup> Jan 2021 any TPP without the appropriate certificate or authorisation will be revoked

#### ASPSP Impact - Cons

- ASPSPs not contracted with OBIE would need to support OBWAC/OBSeal or equivalent
- ASPSPs that do not use DCR will not be able to rely on the SSA to ensure TPPs are in possession of a valid certificate

#### TPP impact – Cons

- UK TPPs with eIDAS certificates would need to modify their software statements and ensure that the appropriate certificates are in use, i.e. OBWAC with or without OBIE legacy certificates depending on the ASPSP
- TPPs that currently use the same software statement for EU and UK ASPSPs will no longer be able to do so - this will lead to a new software statement and loss of consents

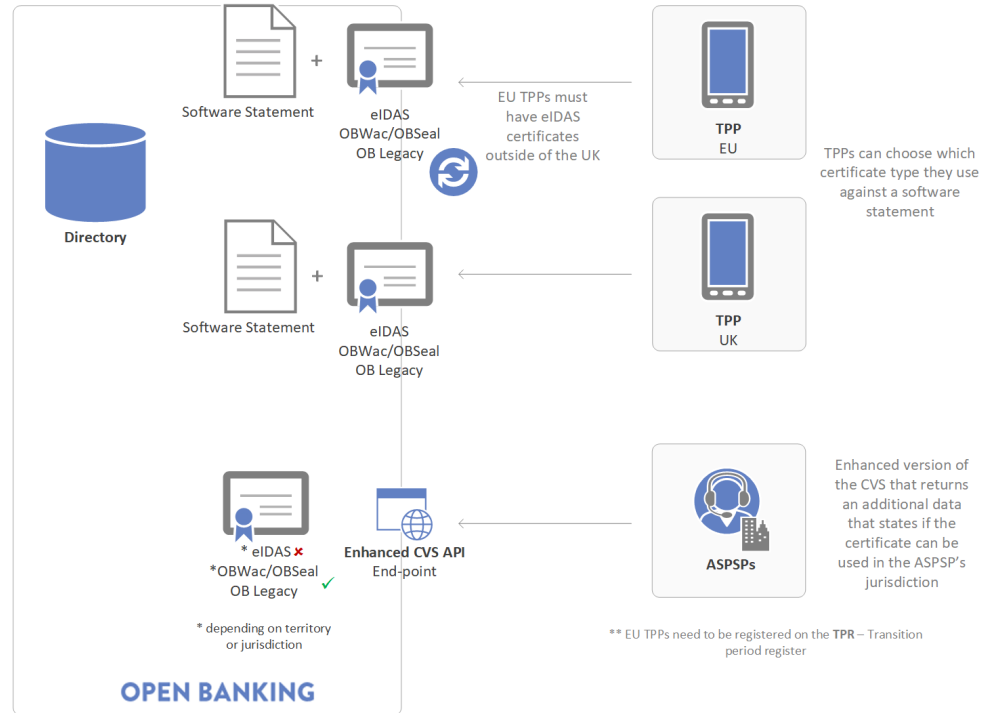
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## OBIE Directory Update

### Option 2: TPPs self-manage certificate usage

#### Description

- TPPs can choose which certificate type they use against a software statement, i.e. current restrictions that were imposed on 13<sup>th</sup> March 2020 are removed
- An additional endpoint is provided: an enhanced version of the CVS that returns additional data that states if the certificate can be used in the ASPSP's jurisdiction



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## OBIE Directory Update

### Option 2: TPPs self-manage certificate usage

#### OBIE Impact - Change

Minor configuration change in Directory and implementation of a new service

#### OBIE Impact - Pros

- A feature flag to remove the restriction is already deployed and used
- Lowest cost in development effort
- High degree of certainty that solution is available by 1<sup>st</sup> Jan 2021
- Given the uncertainty which is likely to continue until late 2020 this option presents the least risk of wasted effort or introducing a change that is at odds with the final position of the FCA
- Given the uncertainty, this option provides a solution that is flexible enough for TPPs and ASPSPs to adapt to the outcome of the consultation and changes

#### OBIE Impact - Cons

- The CVS may see significantly more traffic than it currently does. OBIE would need to ensure that it is sufficiently engineered and optimised to deal with the additional traffic and has sufficient availability and scalability

#### ASPSP Impact - Change

- Low / Optional - ASPSPs can carry out their own impact assessments and choose to use the new service if they desire

#### ASPSP Impact - Pros

- No mandatory change for ASPSPs
- OBIE solution is likely to be delivered prior to Christmas code freeze

#### ASPSP Impact - Cons

- ASPSPs not contracted with OBIE would need to support OBWAC/OBSeal or equivalent
- OBIE would need to ensure that EU-based ASPSPs understand that software statements do not guarantee the presence of an eIDAS certificate

#### TPP Impact - Change

- No impact

#### TPP Impact - Pros

- No changes required

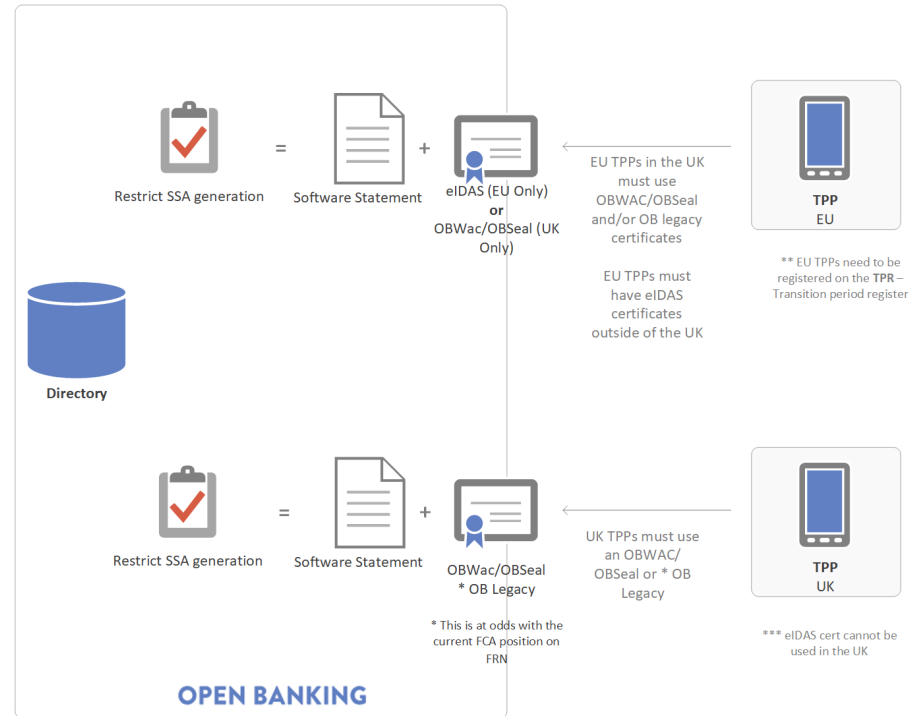
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## OBIE Directory Update

### Option 3: Disable eIDAS usage for all TPPs

#### Description

- Discontinue the use of eIDAS certificates for UK-based ASPSPs, i.e. UK and EU TPPs cannot upload eIDAS certificates to the Directory
- UK and EU TPPs would use OBWAC/OBSeal and/or OBIE legacy certificates
- EU TPPs must have eIDAS certificates outside of the UK



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## OBIE Directory Update

### Option 3: Disable eIDAS usage for all TPPs

#### OBIE Impact - Pros

- Much simpler business logic change than disabling eIDAS usage for UK TPPs

#### OBIE Impact - Cons

- The FCA's consultation [document](#) (section 3.9) states that alternative certificates must contain the TPP's National Competent Authority and registration number (FRN) in Para 3.8 and 3.9. This rules out the use of OBIE legacy certificates. The FCA would need to change its direction
- High cost in development effort
- Risk of the solution not being available by 1<sup>st</sup> Jan 2021
- The FCA consultation Para 3.7 does not follow this route and instead suggests the use of "eIDAS + 1 another". The FCA would need to change its direction to support this option
- Given the uncertainty which is likely to continue until late 2020 this option presents a risk of wasted effort or introducing a change that is at odds with the final position of the FCA

#### ASPSP Impact - Pros

- Opportunity for ASPSPs to significantly simplify their network landing zones by removing the requirement for eIDAS support

#### ASPSP Impact - Cons

- Possibly substantial changes to ASPSP stack
- ASPSPs may not be able to implement their changes prior to Christmas code freeze
- ASPSPs not contracted with OBIE would need to support OBWAC/OBSeal or equivalent

#### TPP Impact - Cons

- Migration / discontinuity for TPPs that currently use eIDAS certificates in the UK

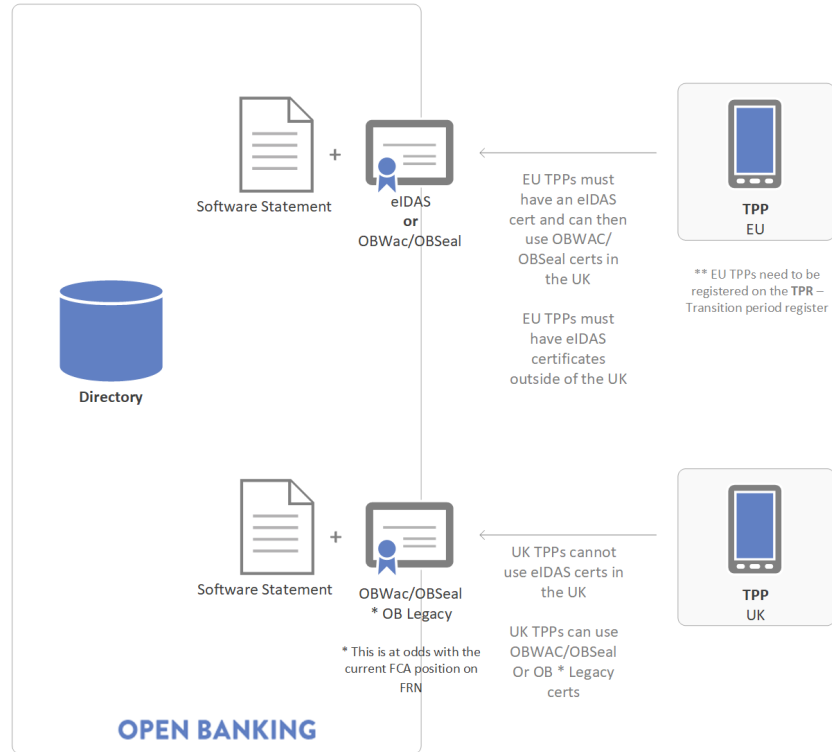
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## OBIE Directory Update

### Option 4: Disable eIDAS usage for UK TPPs

#### Description

- UK TPPs cannot use eIDAS certificates in the UK
- UK TPPs must use OBWAC/OBSeal and/or OBIE legacy certificates
- EU TPPs must have an eIDAS certificate and can then use OBWAC/OBSeal or OBIE legacy certificates in the UK
- EU TPPs must have eIDAS certificates outside of the UK
- The above restrictions are implemented primarily on the software statement functionality, making it unavailable without the correct certificates



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## OBIE Directory Update

### Option 4: Disable eIDAS usage for UK TPPs

#### OBIE Impact - Cons

- The FCA's consultation [document](#) (section 3.9) states that certificates must contain the TPP's National Competent Authority and registration number (FRN). This rules out the use of OBIE legacy certificates
- The FCA consultation Para 3.7 does not follow this route and instead suggests the use of "eIDAS + 1 another". The FCA would need to change its direction to support this option
- Highest cost in development effort
- Very high risk of the solution not being available by 1<sup>st</sup> Jan 2021
- Given the uncertainty which is likely to continue until late 2020 this option presents a risk of wasted effort or introducing a change that is at odds with the final position of the FCA

#### ASPSP Impact - Cons

- ASPSPs may not be able to implement their changes prior to Christmas code freeze
- ASPSPs not contracted with OBIE would need to support OBWAC/OBSeal or equivalent

#### TPP Impact - Cons

- Migration / discontinuity for TPPs that currently use eIDAS certificates in the UK



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## Question & Answer session Replay

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This section of the document provides a 'replay' of the Questions that were raised on the OBIE's consultation webinar on the 15<sup>th</sup> September, as well as answers from the OBIE team.

Please use the navigation below to jump directly to the most relevant section for you.

Revocation of certificates on 1<sup>st</sup> January

Impacts on TPPs

FCA options for changing the law

Impact on end users

Impacts on ASPSPs

OBIE Technical Directory changes

**Question:** Are we sure that all QTSPs will revoke UK TPP PSD2 eIDAS certificates on the 1st of January 2021?

**Answer:** There is still some discussion within the industry.

At one end of the spectrum, it remains unclear whether the EBA have regulatory (or other) oversight over individual QTSPs. There have been indications that a number of QTSPs would like to continue offering services.

At the other end of the spectrum, there is certainly a view that all certificates will be automatically revoked.

In practice, the reality may well land somewhere in the middle of these two ends of the spectrum.

From a risk-management perspective, the chance that eIDAS certificates may not be revoked, is too big a gamble to take for the OBIE ecosystem.

**Question:** What will happen to existing banking connections using eIDAS certificates on the 1<sup>st</sup> January 2021?

**Answer:** This will depend significantly on the findings and outputs from [the FCA's consultation](#), and what alternative solutions are allowable.

The consultation will remain open until the 5<sup>th</sup> October 2020.

OBIE welcomes the consultation on eIDAS certificates, and will be submitting our own response in due time. We encourage members of our ecosystem to submit their own responses also.

**Question:** What about passporting, under the FCA's Temporary Permissions Regime?

**Answer:** The EBA statement is based on the assumption that passporting will conclude at the end of 2020.

**Question:** What is the likelihood of any extension to the use of eIDAS certificates?

**Answer:** Indications from the EBA and the European Commission are that they are not currently examining, or working to facilitate, any extension of the current deadline of midnight on 31<sup>st</sup> December, 2020.

**Question:** I'd like to learn more about the results of the ASPSP survey data

**Answer:** The results from both surveys are included in this document. Members of the OBIE ecosystem should contact their IES representative for any further detail.

**Question:** As an ASPSP, will I need to support both eIDAS certificates for EU TPPs, as well as the alternative solution for UK TPPs?

**Answer:** The current wording of the FCA Consultation points to UK ASPSPs being expected to support both eIDAS certificates, and the alternative form of TPP certification once agreed.

We encourage members of our ecosystem to submit their own responses to the Consultation.

**Question:** What will the impact be should TPPs and Banks have to swap certificates within a short timeframe?

**Answer:** The results of our survey point to different ASPSPs having different implementations. There are some permutations, such as moving a TPP customer from an eIDAS certificate to an appropriately-configured QWAC, that should result in low risk of a breaking change to the end user experience. However, the variation in implementations make this hard to predict.

We recognise that there are potential issues on a per-firm basis, and encourage ecosystem members to engage with us proactively with the aim of laying the foundations for as smooth a transition as possible.

The aim will be to achieve a balance between avoiding breaking changes as a consequence of prescriptive new requirements, and supporting the ecosystem move to the new requirements with minimal disruption.

The OBIE has expressed this to the FCA, and we encourage members of our ecosystem to submit their own responses to the Consultation.

**Question:** What actions are the FCA taking, to try to minimise disruption to the ecosystem?

**Answer:** The FCA representative on the call reported historic engagements with the EU Commission and the EBA.

There are ongoing discussions in the run up to the 5<sup>th</sup> October with a range of trade bodies, and are committed to moving as quickly as possible, within the specific governance constraints and processes in place, to provide clarity to the UK's open banking ecosystem. The FCA representative acknowledged the industry's desire for clarity, welcomed all written responses to the Consultation, and expressed a hope that the Consultation report might be published in November 2020.

**Question:** Will non-English QTSPs be able to issue QWACS or QSealCs to UK TPPs for open banking transactions after 1<sup>st</sup> January 2021?

**Answer:** Detail around this issue will likely begin to emerge following the FCA report on its Consultation – including requirements around policies and certificate profiles, and requirements for Certification Authorities to fulfil in order to have their certificates trusted.

**Question:** My firm acts as an ASPSP – what actions should we take to be compliant with the new rules - do we have to revoke the eIDAS certificates for TPPs registered with us?

**Answer:** The right to revoke a certificate lies with either the firm who owns the certificate, or the certificate authority.

In the question of whether an ASPSP should refuse connections from a revoked certificate, or other connections, this will depend significantly on the findings and outputs from [the FCA's consultation](#), and what alternative solutions are allowable.

The consultation will remain open until the 5<sup>th</sup> October 2020.

OBIE welcomes the consultation on eIDAS certificates, and will be submitting our own response in due time. We encourage members of our ecosystem to submit their own responses also.

**Question:** Is it envisaged that the existing checks carried out by the OBIE Directory will continue to work as they currently do?

**Answer:** We are looking at a variety of options to changes of the Technical Directory (see slides 7-16 of this document) in response to the EBA statement and the output of the FCA Consultation.

One of those options includes an enhanced Certificate Validation Service (CVS) which would add additional information into the current response, to indicate whether a certificate can be used in the recipient's jurisdiction.

That enhanced service notwithstanding – all the options envisage that the OBIE Directory continues to perform its current functionalities, including TPP authorisations and certificate validation.

Additionally, the FCA's Temporary Permissions Regime (TPR) list will be uploaded into the Technical Directory on the night of the 31<sup>st</sup> December.



**Question:** Will the ASPSP have to carry out any further explicit checks on the regulatory status of a TPP when they attempt to on-board?

**Answer:** This will depend significantly on the findings and outputs from [the FCA's consultation](#), and what alternative solutions are allowable.

The consultation will remain open until the 5<sup>th</sup> October 2020.

OBIE welcomes the consultation on eIDAS certificates, and will be submitting our own response in due time. We encourage members of our ecosystem to submit their own responses also.

**Question:** Is there a possibility that UK ASPSPs will no longer accept OBIE certificates, and only allow EU TPPs with valid eIDAS certificates to access their APIs?

**Answer:** OBIE is working hard to support the ecosystem – including those TPPs who face the challenge of migrating to using OBIE certificates in a manner that maintains existing consents and keeps end user disruption to a minimum.

There is still work to be done – including for those ASPSPs who currently support both eIDAS and OBIE certificates.

A combination of RFC7592 and refresh tokens provide a ‘clean’ route towards migrating from one certificate issuer to another – firms with questions or requests for further detail are encouraged to contact their IES representative.

As it currently stands, the expectation is that UK ASPSPs will need to accept eIDAS certificates for EU TPPs with TPS and alternative certificates (possibly including but not limited to OBIE certificates) for UK TPPs.

**Question:** Following the deadline on 31<sup>st</sup> December 2020, will UK-based TPPs continue to use OBIE ETSI certificates to access APIs/account information provided by UK-based ASPSPs?

**Answer:** This will depend significantly on the findings and outputs from [the FCA's consultation](#), and what alternative solutions are allowable.

**Question:** We are a start-up and have just purchased eIDAS certificates. Can we get a refund for unused portion?

**Answer:** This will depend primarily on the relationship and contract between a TPP and their QTSP.

**Question:** Can you describe the duration/costs associated with the process of a TPP requesting and receiving an OBIE certificate from the OBIE Directory?

**Answer:** There is no cost in the generation of OBWACS, OBSealCs or OBIE legacy certificates for firms who have enrolled onto the OBIE Directory.

**Question:** We would appreciate any information on how UK companies can continue to work in Europe after our eIDAS certificates are revoked. Will we be required to open an office in Europe in order to do European open banking?

**Answer:** The EBA has stated that firms who wish to do business inside the EEA will require a license issued by a European NCA. Individual NCAs will have different requirements in terms of 'bricks and mortar' offices.

**Question:** Will end users lose access to their open banking-enabled applications from January 1<sup>st</sup> 2021?

**Answer:** The connection between PSU and TPP app should remain unchanged. What may change is that the PSU may lose the connection between their TPP app and their bank account. Assuming that the TPP/ASPSP are allowed (by FCA) to implement an alternative form of identification, then the connection to the bank account should still be possible.

**Question:** Will all PSUs have to reconnect their bank accounts to these apps?

**Answer:** Possibly. This depends on what alternative form of certificate is used by the TPP/ASPSP and whether the ASPSP can make this change in a way which does not require the PSU to reauthenticate. Ideally no PSUs will have to reauthenticate and services will not be disrupted, but this may not be the case for all users/apps.

**Question:** If PSUs do have to reconnect, will this be the same (i.e. shorter) re-authentication flow or a full journey as if setting up a new consent?

**Answer:** Possibly. Again, this depends on the changes made by TPPs/ASPSPs. It should certainly be possible for the shorter journeys to be enabled if/where needed.

**Question:** What if a UK TPP submits an eIDAS certificate to an EU ASPSP after 31<sup>st</sup> December?

**Answer: [POLICY PERSPECTIVE]** The EBA statement of 29<sup>th</sup> July is clear: it states that "In order to continue to provide services in the EU, relevant UK-based financial institutions need to ensure that they have appropriate authorisations from the EU competent authorities in place, including for their existing branches already operating in the EU, and fully establish those operations. In particular, financial institutions should ensure that associated management capacity, including appropriate technical risk management capabilities, is effectively in place ahead of time, and is commensurate to the magnitude, scope and complexity of their activities, to allow for effective and efficient management of risks they generate."

**Answer: [TECHNICAL PERSPECTIVE]** The responsibility for revoking certificates lies with either the issuer or the firm who owns the certificate. OBIE will not be removing any uploaded certificates from its Directory – as we run frequent checks on certificates' validity. If the enhanced Certificate Validation Service, referenced as one option regarding potential changes to the Technical Directory, comes into effect, then the EU ASPSP will be able to submit the eIDAS to OBIE for validation by the enhanced CVS – and would in this case receive a response that the eIDAS certificate was a) valid, but b) not authorised for use in the ASPSP's jurisdiction. Note that OBIE provides a TPP endpoint that provides PSD2 authorisation data for firms so that ASPSPs can validate TPP authorisations and reject a request if the TPP lacks a passport to its jurisdiction.

**Question:** What changes will be incorporated into the Software Statement Assertion to denote a PSD2 passport / authorisation from the FCA? Will this simply replace the 'outbound' passport record for EU firms? Or will you include additional attributes on it?

**Answer:** Any change to the Software Statement Assertion would be a breaking change. OBIE intends to make no change to the SSA and is reviewing options that would support this with no change.

**Question:** When will OBIE allow TPPs to create production accounts without an eIDAS certificate?

**Answer:** From 1<sup>st</sup> January 2021 in Production

**Question:** Is the CVS only available for ASPSPs or can TPPs also consume this endpoint?

**Answer:** TPPs are also able to access the CVS endpoint.

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# Thank you

Contact [comms@openbanking.org.uk](mailto:comms@openbanking.org.uk)  
with any questions based on  
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