

Launch Support

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Name	Role	Workstream	Approver / Reviewer / Informed
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1 Objectives of Launch Support

The Open Banking Implementation Entity (OBIE) would like to ensure all Participants and Technical Service Providers (TSPs) looking to operate within the Open Banking Ecosystems (Test and Live) do so in a supported manner that helps continue to promote the openness that was instigated during the initial Managed Roll-Out period during January to March 2018. (See *Note*)

This will be known as **Launch Support**.

(Note) The objective of Managed Roll-Out was a voluntary agreement with TPPs to limit volumes in the first few weeks after 13th January 2018 of go-live and overseen by the OBIE. This was to minimise the likelihood of unmanageable volumes in the first stage of go-live whilst maintaining a fair Open Banking Ecosystem.

The objective of Launch Support is to provide all Participants and TSPs with a level of assistance that will help guide them through testing to go-live (where applicable), ultimately expediting growth of the Open Banking Ecosystem and consumer adoption.

Launch Support will build on the objectives laid down during the initial Managed Roll-out period, namely:

- Access to a Test Open Banking Ecosystem comprising
 - Open Banking Directory Sandbox
 - Model Banks
 - Reference Applications
 - Integration with ASPSP 'RTS Sandboxes' as they become available
- Support for testing activities from OBIE Testing Workstream
- Support for technical queries from OBIE Participant On-Boarding (POB) Team
- Support during Participant transition to the Live Open Banking Ecosystem e.g.
 - Live Proving support for ASPSPs via coordination of voluntary buddy relationships with authorised and/or registered TPPs
 - First Occurrence Validation for TPPs via coordination of voluntary buddy relationships with ASPSPs
 - Voluntary agreements with TPPs to limit volumes in the first few weeks of First Occurrence Validation to minimise the likelihood of unmanageable volumes for new ASPSPs in the first stage of go-live whilst maintaining a fair Open Banking Ecosystem. For TPPs this approach will also ensure good customer outcomes.
 - Support for PR and customer communications through examples such as use of common language and a listing in the regulated providers index on the Open Banking website
- The objective of Launch Support is not to assess or qualify the TPPs before going live. All authorised and/or registered TPPs can operate in live as long as they remain authorised by or registered with a Competent Authority.

- As has been seen during the initial Managed Roll-Out, initial 'pipe cleaning' activities took more time and focus than expected and therefore this supports the undertaking of Launch Support including voluntarily controlling volumes to mitigate similar experiences.

This document forms the guidance to Participants and TSPs on how Launch Support can help guide them through their testing journey and on to go-live, where applicable.

As per Managed Roll-Out, relevant legislation and regulation will apply including but not limited to PSD2, PSRs, CMA Order and data privacy legislation (Applicable Law). All Participants are responsible for their own compliance with Applicable Laws, this includes for example complying with any applicable data privacy regulations and obtaining consent under PSD2.

OBIE does not take any responsibility for and disclaims any liability for Participants' failure to comply with Applicable Law.

2 Purpose of Document

The purpose of this document is to provide guidance on how Launch Support will operate for Participants and TSPs.

To achieve this, it is necessary to re-cap on the **Open Banking 2018 Testing Approach** to be supported going forwards, as this is a key aspect of Launch Support.

Once the context of the Open Banking 2018 Testing Approach is outlined, this document indicates the coverage of Launch Support for different types of Participants (ASPSPs & TPPs) and TSPs during their journey through testing and on to go-live, where applicable.

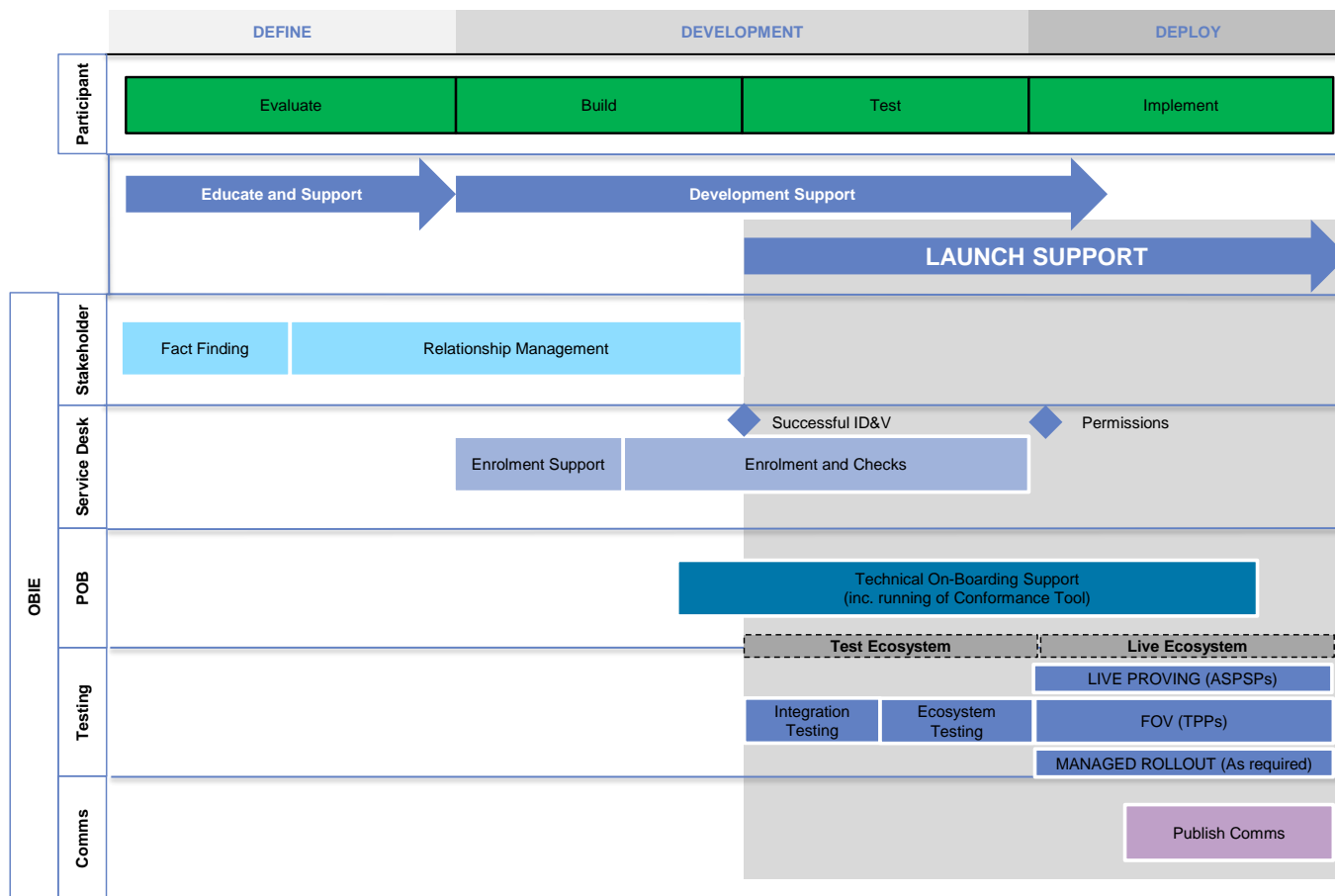
Additionally, this document provides a summary overview of the increasing functionality of the Test Open Banking Ecosystem that those Participants and TSPs who continue in testing will receive.

3 Principles of Launch Support

The following voluntary principles should apply:

1. TPPs cannot be discriminated against (the “level playing field for TPPs”)
2. TPPs should not face additional costs as a result of this approach (the “no barriers to entry” principle)
3. TPPs should not face additional requirements over existing regulatory requirements (the “fully authorised/registered” principle)

4 Launch Support – Participant Journey



Whilst testing is a key aspect of Launch Support, it can be seen from the above that many teams within the OBIE come under the banner of Launch Support.

OBIE Participant On-Boarding Team in particular will provide technical support relating to issues raised, Directory integration, integration/dynamic registration with Model Banks, running of Conformance Tool etc.

Launch Support is an enduring activity designed to provide support to Participants and TSPs during their testing journey and on to go-live, where applicable.

During Launch Support, OBIE will assist in the coordination of TPP / ASPSP voluntary buddying to ensure dynamic allocation of volumes on a best efforts basis to balance the interest of TPPs and ASPSPs.

Additionally, OBIE will provide support for PR and customer communications through examples such as use of common language and promotion via the Open Banking website.

5 Open Banking 2018 Testing Approach – Summary

OBIE has successfully delivered the capability to support the requirements of the CMA Order (Release 1). From a testing perspective OBIE achieved this by implementing a testing approach and environments to support multiple phases of testing.

The purpose of this section is to provide an overview of the OBIE recommended approach for testing as OBIE transitions from Release 1 into the OBIE Roadmap deliverables in 2018/19.

On 15 July 2015, the EBA issued final guidelines on product oversight and governance arrangements for retail banking products. All Participants should make every effort to comply with these guidelines.

This approach takes into consideration the timelines of the future OBIE Roadmap deliverables and their impact on the continuing need to support testing in the Open Banking Ecosystem. The approach must support existing Participants as well as newly enrolled ASPSPs and TPPs. TSPs will be supported in their testing activities in the Directory Sandbox. The approach must also provide provision for 'regulated' and 'unregulated' Participants.

For the purposes of this document regulated and unregulated Participants are defined as:

Regulated

- An entity that has been granted appropriate permissions from their Competent Authority

Unregulated

- An entity that has indicated that they have applied for (or intend to apply for) but not yet been granted appropriate permissions (ASPSPs and TPPs)
- An entity that does not intend to apply for appropriate permissions (Technical Service Provider – TSP)

This approach introduces the notion of 'testing tracks'. There are 3 testing tracks:

- Track 1 – Regulated
- Track 2 – Unregulated
- Track 3 – Managed Roll-Out

The timelines and test phases incorporated within each testing track are different.

Testing Tracks 1 and 2 forms the OBIE long term (BAU) testing proposition.

Testing Track 3 will be triggered by OBIE as and when required. Managed Roll-Out will be triggered for example when new products or sectors enter the Open Banking Ecosystem. Any planned Managed Roll-Out phase will be communicated and agreed via the appropriate governance forums.

This section will also introduce new OBIE Roadmap testing phases and describe how these new test phases replace the test phases implemented for Release 1.

The OBIE test phases implemented for Release 1 were:

- Integration Testing
- Multi-Party Industry Testing
- Live Proving
- Managed Roll-Out

The new OBIE test phases implemented for OBIE Roadmap are:

- Integration Testing
- Ecosystem Testing
- Live Proving
- First Occurrence Validation (FOV)
- Managed Roll-Out

Live Proving, First Occurrence Validation and Managed Roll-Out collectively come under the umbrella of Launch Support. These remain voluntary for all Participants.

Track 1 – Regulated

- The purpose of Track 1 is to allow new and existing regulated ASPSPs and TPPs to engage in testing with OBIE and the Participants will engage in Integration, Ecosystem and **FOV or Managed Roll-Out** Testing. If Managed Roll-Out, then this will become Track 3.

Track 2 – Unregulated

- The purpose of Track 2 is to allow new and existing unregulated ASPSP, TPP and TSPs to engage in testing with OBIE and the Participants and TSPs will engage in Integration and Ecosystem Testing. Movement onto Track 1 will occur as and when Participants complete their authorisations/enrolment and become regulated.

Track 3 – Managed Roll-Out

- OBIE will trigger a phase of Managed Roll-Out upon the introduction of a major release into the Open Banking Ecosystem. The purpose of a phase of Managed Roll-Out is to facilitate a smooth, controlled (volume-based) roll-out of the release.

N.B. Production Reference Accounts

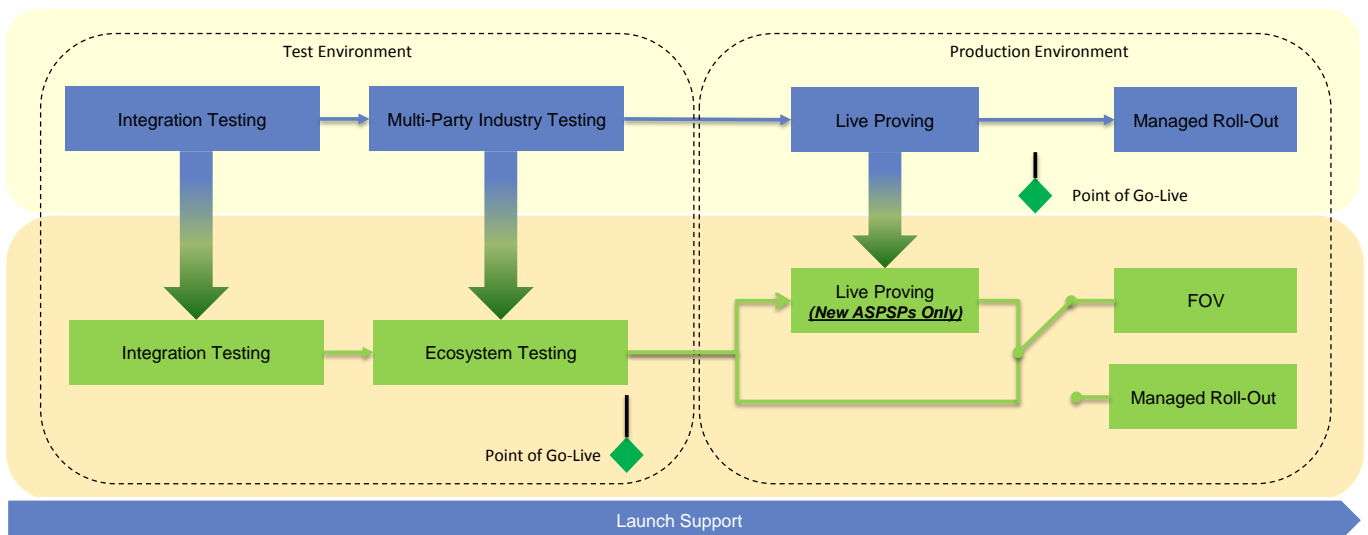
During FOV or Managed Roll-Out, OBIE may require access to ASPSPs Production Reference Accounts to facilitate testing whilst not exerting the overhead of support on ASPSPs. If required, OBIE and the ASPSP would enter into an agreement for OBIE to manage these accounts during the FOV or Managed Roll-Out period.

Principles of FOV vs Managed Roll-Out	FOV	Managed Roll-Out
Controlled volumes	Yes	Yes
Production Reference and Staff Accounts before Customer Accounts	Yes	Yes
Controlled roles – AISP before PISP	Yes	Yes
Controlled allocation of ASPSPs to TPPs	No	Yes
Management calls	No	Yes
Support model	No	Yes
MI reporting	No	Yes

6 2018 Testing Approach – Testing Tracks & Test Phase Mapping

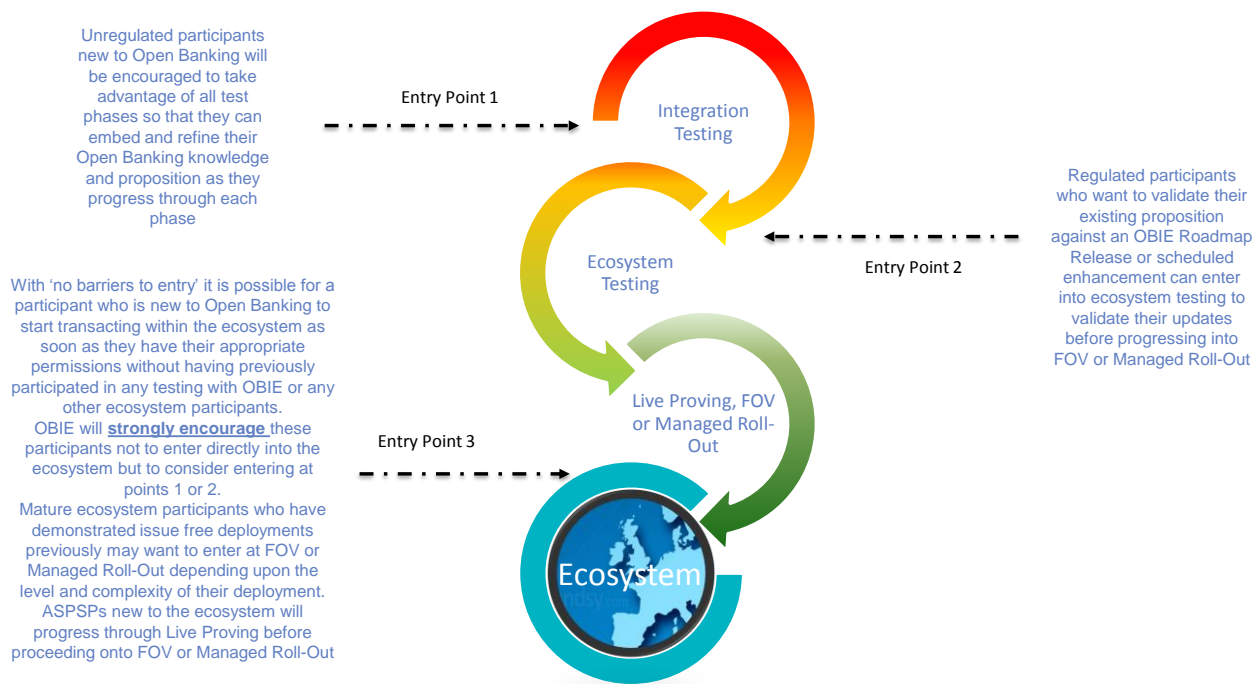
Testing Tracks	OBIE Roadmap Test Phases				
	Integration Testing	Ecosystem Testing	Live Proving	FOV	Managed Roll-Out
Track 1	✓	✓	✓	✓	✓
Track 2	✓	✓	-	-	-
Track 3	-	-	-	-	✓

- It is recognised that individual Participants and TSPs may have their own specific testing terminology. However, to be able to provide a consolidated view of testing progress across all parties (external to OBIE), it is necessary to ensure an agreed and consistent terminology as per the OBIE 2018 Testing Approach summarised below..
- Below shows how the Release 1 test phases map against the new OBIE Roadmap test phases.



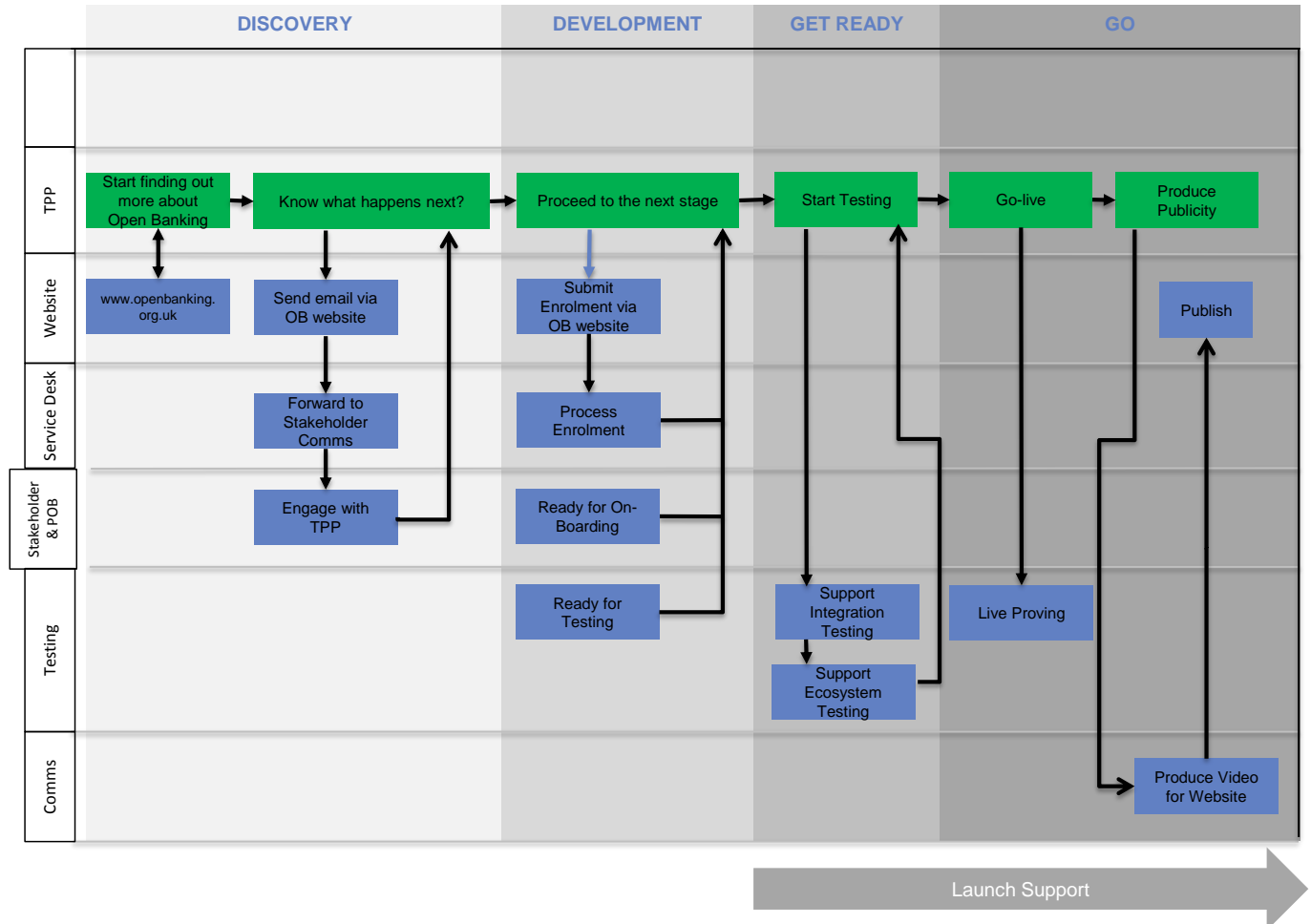
7 2018 Testing Approach – Voluntary Engagement

OBIE will maintain an open inclusive dialogue with all Participants and TSPs. OBIE will actively encourage all Participants and TSPs to engage in testing for the benefit of the individual organisations and the Open Banking Ecosystem as a whole. Depending on the maturity of the individual organisations within the Open Banking Ecosystem, OBIE will guide them to the appropriate testing ‘entry point’ and provide support as required.

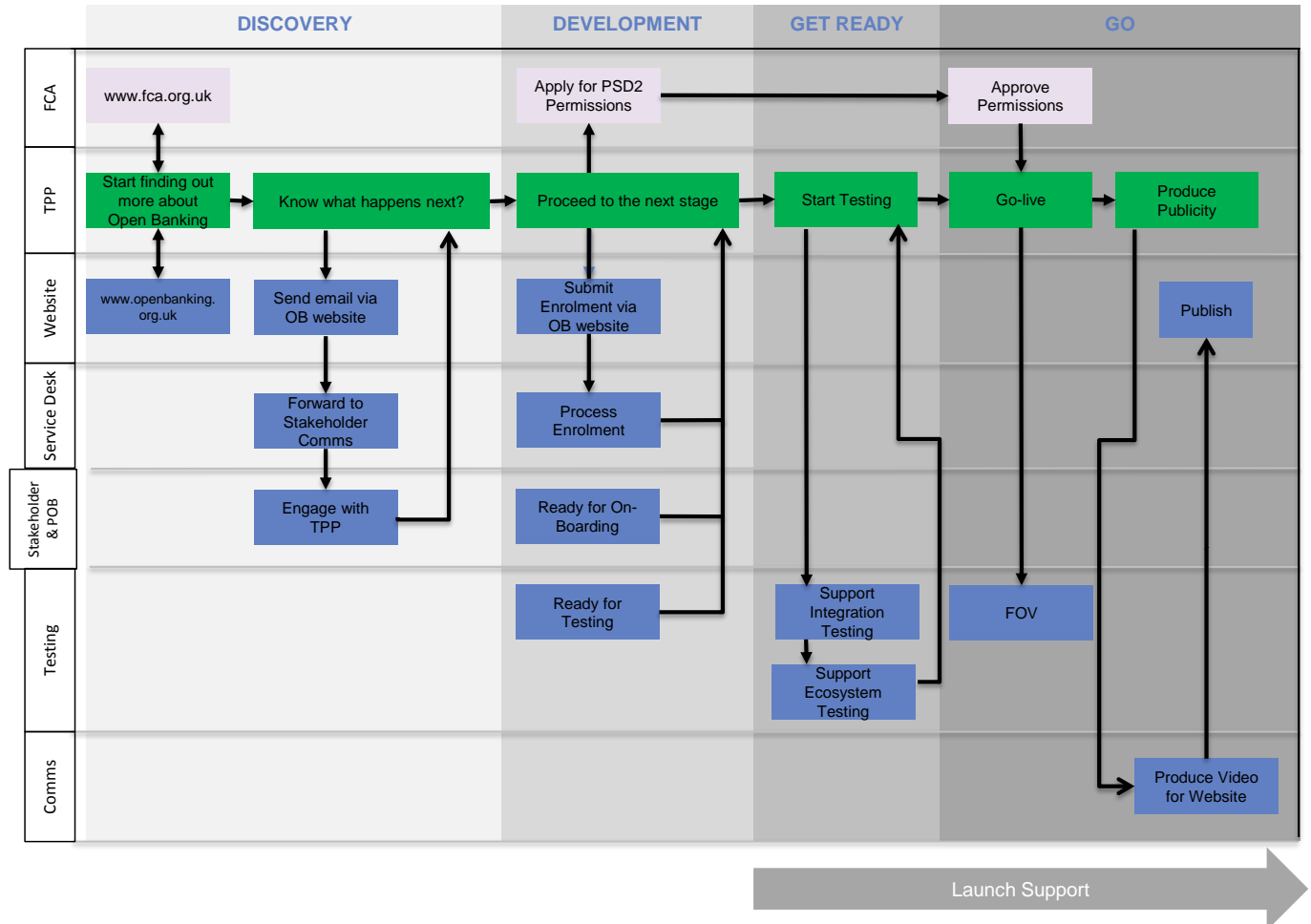


Launch Support

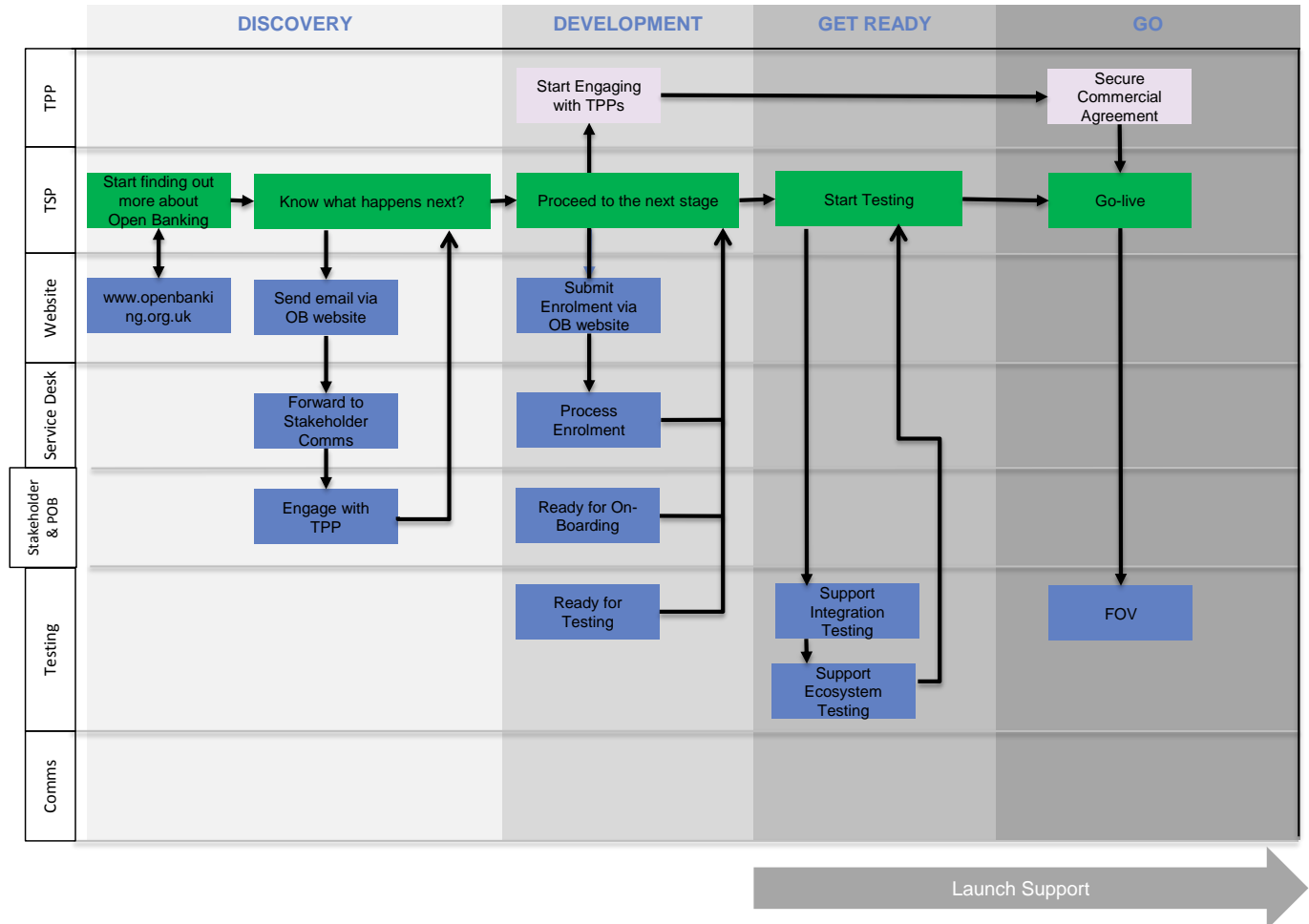
8 Launch Support – ASPSP



9 Launch Support – TPP

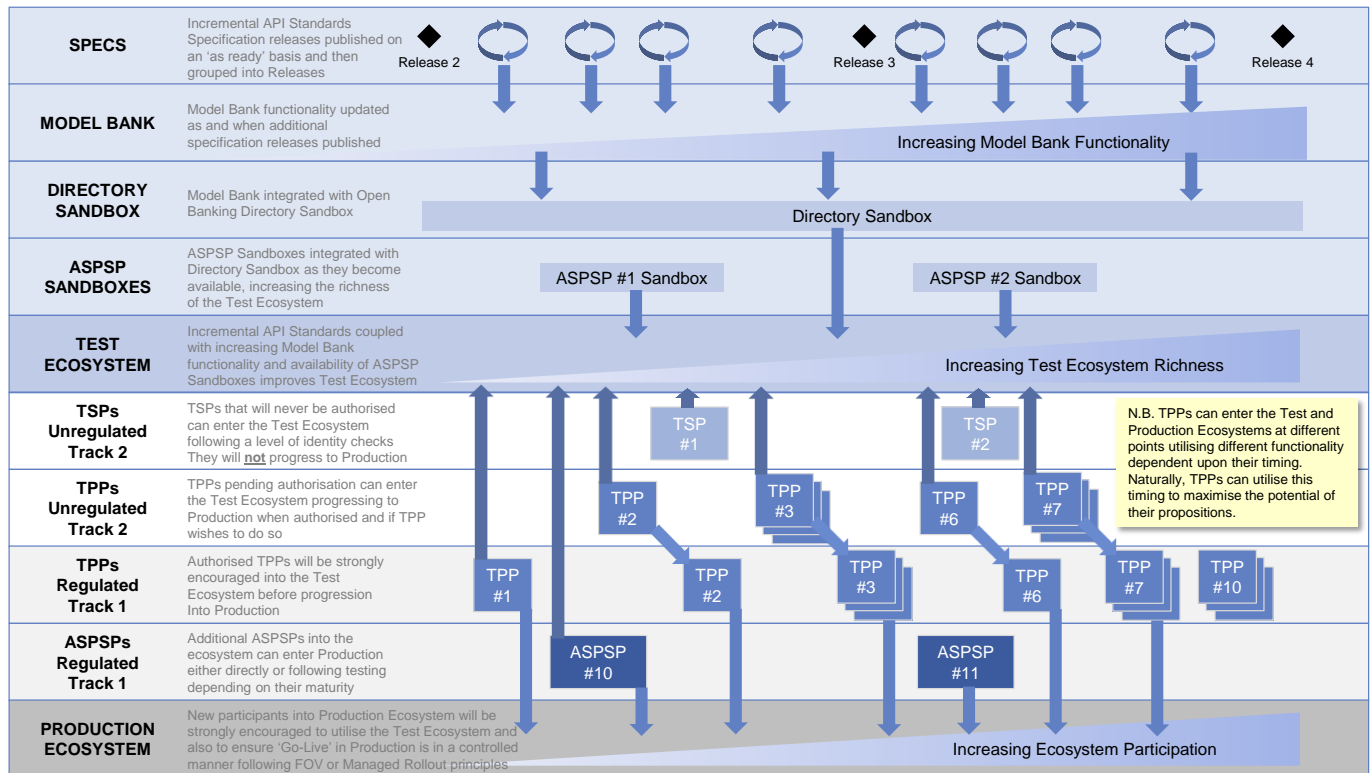


10 Launch Support – TSP



11 Increasing Functionality of the Test Open Banking Ecosystem

As Participants and TSPs progress through the testing aspects of Launch Support, they will increasingly benefit from the increasing functionality of the Test Open Banking Ecosystem as indicated below:



12 Communications and Progress Updates

Continuing on from the regular existing Open Banking testing meetings, Launch Support updates will be covered as part of the standing agenda items covering the various testing phases, with any issues or escalations also covered.

The existing Open Banking testing meetings are:

- Testing Working Group (ASPSPs) Tuesdays, 1000-1100
- Testing Working Group (All Participants and TSPs) Thursdays, 1100-1200

These meeting are coordinated by OBIE Testing Workstream.

13 Ticket Management

To assist in the identification of common themes during all aspects of Launch Support, identified issues should be raised and managed through the *Open Banking Implementation Entity Jira Service Desk (JSD)*; the guide to this having been supplied as part of OBIE enrolment, in addition to the relevant issue management systems of the Participants and TSPs.

For OBIE, two types of issue will exist:

1. OB owned issues – Issues between Open Banking and Participants (ASPSPs and TPPs)
2. Participant and TSP owned issues – Issues between ASPSPs, TPPs & TSPs (external to Open Banking)

Traditionally issues between external organisations outside of one's own organisation would not be visible to anyone except the organisations involved. If this model was employed in the Open Banking Ecosystem then multiple organisations could be duplicating time and effort on the same issues and resolutions

In the spirit of openness and in order to facilitate the dissemination of issues and their resolution across the Open Banking Ecosystem, these 'Participant and TSP owned issues' will be raised through the Open Banking JSD.

These issues will be managed by the external organisations involved but because Open Banking will be aware of them they can help where required.

Appendix: Glossary

For further information on the terms used within this document please refer to the Glossary on the Open Banking website at www.openbanking.org.uk.