



# Peppol

The future is open

Peppol Service Provider Community

Regular meeting

September 29<sup>th</sup> 2020

[www.peppol.eu](http://www.peppol.eu)

Peppol is owned by OpenPeppol AISBL

# Agenda

1. New agreement structure
  1. Comments on policies
  2. Peppol Authority specific requirements

## Topics covered

- Where are we in the process and next steps
- Review of some key topics
  - PA Specific Requirements
  - Contractual relationship with End User
  - Service Level Requirements towards End Users
  - Recurrent Testing
  - Use of Peppol Directory
  - The KYC dilemma
  - The role of the Compliance policy
- Q&A, open discussion

# Comments on supporting policies

Comments received as per September 16

- 988 individual comments received from 11 PA's (all except IR and UK), 29 SP's and 1 end user community (BEAst AB), as well as OO staff

	Total no of comments	From PA's	From SP's	From end users	From OO staff
Know Your Customer Policy	155	72	80	3	
Data and Reporting Policy	171	50	114	7	
Compliance Policy	145	61	78	6	
Change Management policy	312	302	5		5
Trust and Security Policy	75	72	1		2
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Service Level Requirements	84	18	64	2	
Applicable Specifications for each Peppol Service Domain	25	12	11	2	
Template for PA Specific Requirements	2	2			
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PA and SP Agreements	2		2		

- In addition there are comments related to:
- the review process (2)
  - the PA Specific Requirements (2)
  - the Layman's guide (4)
  - and 11 comments of a general nature

- 11 of the SP's have coordinated their feedback by submitting identical comments

# Comment resolution on policy documents

Time is a concern

- We are now in the process of preparing updated versions of the policy documents
- Revised documents need to be available for MC endorsement by October 2
- Updated policy documents will be made available for a 2<sup>nd</sup> review immediately following the MC meeting on October 6
  - PA Specific requirements will be made available for information
- Aim is to have all supporting documents finally approved during 2<sup>nd</sup> half of November

document		July	August	September	October	November	December
PA Specific Requirements		Document current requirements		Compliance Review	Review	Comment res. → Appr.	
Layman's Guide		Final draft					
Applicable specifications		Publish	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
SLA requirements		Publish	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
Change Management		Final draft	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
Data and Reporting		Final draft	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
KYC		Final draft	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
Trust and Security		Final draft	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	
Compliance		Updates	Review	Comment res.	2 <sup>nd</sup> review	Comment res. → Appr.	

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# PA Specific Requirements

## The issue

- Several SP's are concerned that extensive and varied use of PA Specific Requirements will fragment the Peppol Network

## Guidance from MC

- All PA Specific Requirements will be made available in parallel to the 2<sup>nd</sup> review of policy documents
  - Now available at <https://openpeppol.atlassian.net/wiki/spaces/AF/pages/1391951873/PA+Specific+Requirements>
- MC approval of PA Specific Requirements will be delayed until November

# PA Specific Requirements

## Overview and status

- **Process**

- Draft requirements received from all PA's (except NHS).
- Compliance review completed.

- **Type Requirements**

- There is a lot of variation in requirements from the different PA's

- **Key concerns**

- Use of accreditation
- Reporting

		AU	NZ	SG	BE	DE	IR	IT	NL	PL	DK	NO	SE	UK
End User identification	End User identification scheme	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes	No	
	KYC requirements	Yes	Yes	Yes	No	No	No	Yes	Yes	Yes	No	Yes	No	
	Accreditation	No	No	Yes	No	No	No	No	No	No	No	Yes	No	
	Sender and receivers in peppol Directory		Yes											
Security	Security requirements	Yes	Yes	Yes	No	No	No	No	Yes	No	No	Yes	No	
	Accreditation	Yes	Yes	Yes	No	No	No	No	Yes	No	No	Yes	No	
Information sharing	Participation in fora	Yes	Yes	Yes	Yes	No	No	Yes	Yes	No	No	Yes	No	
	Accreditation	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	
	Reporting	Yes	Yes											
Peppol Addressing and Capability Look-up services	Use of centralised SMP	No	No	Yes	Yes	Yes	No	Yes	Yes	No	Yes	Yes	No	
	SMP specific requirements	Yes	No	Yes	Yes	No	No	Yes	Yes	Yes	No	Yes	No	
	use of Peppol Directory		Yes											
	Specific interoperability standards available	Yes	Yes	No	No	No	No	No	No	Yes	No	No	No	
Post-award	Accreditation	Yes	Yes	Yes	No	No	No	No	No	No	No	No	No	
	Specific interoperability standards available	Yes	Yes	Yes	No	Yes	No	Yes	Yes	Yes	No		No	
	Use of specific Interoperability standards	Yes	Yes	Yes	No	Yes	No	Yes	Yes	No	No		No	
	Validation of identifiers		Yes											
	End-to-end testing		Yes											
Pre-award	Accreditation	Yes	Yes	Yes	No	No	No	Yes	No	No	No		No	
	Specific interoperability standards available	No	No		No	Na	No	No	No	Na	No		No	
	Use of specific Interoperability standards	No	No		No	Na	No	No	No	Na	No		No	
Other legislative or regulatory requirements	Accreditation	No	No		No	Na	No	No	No	Na	No		No	
	Reporting	Yes	Yes	No	No	No	No	No	No	Yes	No		No	



# Contractual relationship to End User

## The issue

- Can/should we place requirements on the **contractual relationship** with End User?
  - What form it should take (“written contract”)
  - Data elements to be captured in a contract

## Suggested resolution

- Should not put requirements on the form in which the contractual relationship is expressed
  - Individual written contracts as well as standard terms of use is possible
- If we don't put requirements on the form, it is challenging to define requirements on data elements to be captured in the contract (2.1)
- Need to emphasise the requirement/responsibility on SP to do KYC checking on End Users

# Service Level Requirements toward End Users

## The issue

- SLA requirements are defined on the relationship between the SP's and the End User
  - E.g. 10 minutes to notify End Users on non-delivery of messages
- Some SP's consider requirements on the End User connection to be out-of-scope for Peppol, and some SP's and PA's are concerned with the explicit requirement stated
- Some PA's are asking for exceptions on the SLA for public sector operated services

## Guidance from CC

- Should maintain service level requirements as minimum requirements for all SP's
  - Actual requirements to be applied should be reviewed by the relevant Domain Community CMB
- Relationship towards End User is in the competitive domain and should not be regulated in detail by OpenPeppol
  - Recommend language such as “delivered to the point requested by the End User”

# Recurrent testing

## The issue

- We have Testbed 2.0 with the capability of testing BIS
- Should it become mandatory on a periodic basis, e.g. for every certificate renewal?

## Guidance from MC

- Expect that we will go in the direction of recurrent testing – question is if now is the time to introduce this requirement
- Must be done on certificate renewal as a minimum
  - To be documented in the Trust and Security Policy
- Should preferably be done at each upgrade of specification
  - To be documented as a strong encouragement in the Compliance Policy

# Use of the Peppol Directory

## The issues

- Some PA's and SP's are asking for the Peppol Directory to be made mandatory for use as comments to the list of applicable specifications

## Guidance from CC

- There is general support for mandating the use of the Peppol Directory
  - Technical support for the Peppol Directory is already mandatory for the SPM Providers
- Should ask for legal advice on whether the data in the Peppol Directory is subject to DGPR and thus need End User consent before publication

# The KYC dilemma

## The issue

- How to balance the need of PA's vs. the need of SP's
  - General concern from PA's that the language is too vague, i.e. more precise and stricter requirements needed
  - General concern from SP's that there are too extensive requirements (“The cost of KYC as proposed will be prohibitive compared to the revenue generated.”)

## Guidance from MC

- The KYC policy need to elaborate on the responsibilities, processes and information needed in order to
  - establish trust in the Peppol Network as a reliable network
  - trace and remove senders attempting to use the Peppol Network for illegitimate purposes
  - ensure that correct PA Specific Requirements are applied
- Responsibilities
  - PA to ensure KYC on SP's
  - SP to ensure KYC on End Users

# Role of the Compliance Policy

## The issue

- What is/should be the role of the Compliance policy – it it really needed?
  - Several/most of the policies have already been implemented in the revised agreement documents or other policies

## Guidance from MC

- The Compliance Policy should be kept as short as possible focusing on topics not covered by other policy documents
- Could function as a placeholder for future topics for which elaboration is needed to avoid changing the agreement documents

## Q&A

- Questions?
- Discussion on other issues for concern?



# THANK YOU!

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