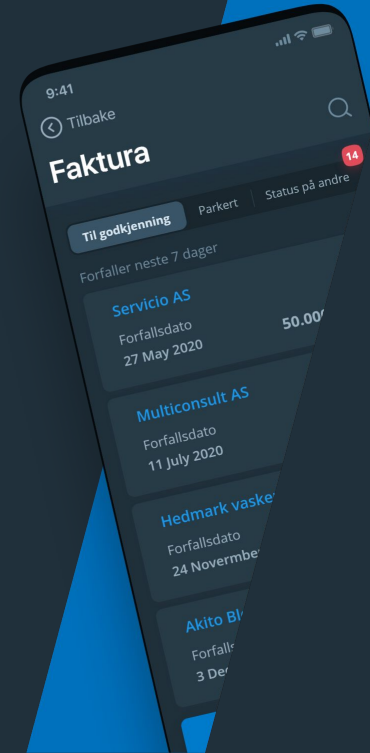# ARTF comment resolution

- End User reporting
- Transaction reporting

Trond Ausdal (ARTF participant, APP CMB member)

13.07.2021

End User and transaction reporting

- Service Provider Agreement 9.5.8
  - Making data available in order to ensure compliance as well as for statistical purposes according to the tool and template established as part of the Data and Reporting provisions stipulated by the Internal Regulations and/or the Operational Procedures

- Internal regulations
  - 4.3 End User reporting
  - 4.4 Transaction reporting

- Operational Procedures - Reporting of Statistics
  - Chapter 3 Process Overview – End User Reporting
  - Chapter 4 Transaction Statistics reporting

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End user reporting

Topic	Comments	Severe Objections
End User Identifiction	47	29
End User Reporting	35	24
Data Usage	5	0
Transaction Reporting	19	4
SP Identification		
Total	**106**	**57**

End User Reporting	24
Objection to the principle of applying an obligation for End User Reporting	9
Objection to the right of the PA and PCA to know the End User information, claiming they do not have the legal basis to request and to provide it	10
Difficult to identify end users connected through intermediaries	5

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End user reporting some comments

"We can't support monthly end user reporting, but it can be performed upon request from OpenPeppol or a Peppol Authority for certain end users if such request is motivated and has legal grounds

"Instead of manual monthly reporting of end users by each SP, OpenPeppol should mandate all required information during registration in Peppol and should mandate registration of the senders as well in some way (e.g. by mandating invoice responses) and collect all these details of end users using Peppol and their Service provider information through Peppol SML or directory directly"

"the monthly reporting of all the information related to end users does not seem to us to be justified"

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End user reporting

- The ARTF has not yet been able to conclude on End User reporting
- Southern hemisphere will work on this as northern hemisphere goes to summer holiday and try to come up with proposals based on the comments and discussions in the ARTF (Simon, Craig, APA, NZPA)
  - We will get back with more details in August/ September

End user reporting

We are not having the conclusions yet, so then we do not know.
Based on discussions in the ARTF so far my impression is that:

- The ARTF seems to agree to maintain that some kind of End User reporting shall be required
- Content
  - Collected info should be minimal (ie. legal ID, Peppol ID, company name)
    - No requirement to keep up to date with marketing names in use (but report to best knowledge)
    - No contact person details (but SP has to prove when relevant/ on request that it can reach its End Users)
- Reporting frequency
  - There have never been any intention to demand data to be verified or reported on every transaction or for end users that are not that SP´s customers
  - It is each SPs responsibility to know our End Users and have proper data quality
    - Regardless of reporting frequency
    - We will need to get back to issue of reporting frequency since there are no conclusion in the ARTF yet

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End user reporting

- Channel
  - We look at the possibility for having Peppol Directory (SMP/ SML) as data source
    - SP upload data to SMP/ Peppol Directory and OpenPeppol pull data from there
    - And as said we think at least a name, legal ID and Peppol Endpoint ID has to be in place
  - We would need to upload all End Users to SMP/ Peppol Directory
    - Even the senders
    - We can see business benefits (easier to find "electronic" trade partners, easier to implement message responses etc)
    - And as SPs we need to know the senders we represent anyway

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Transaction reporting

Internal Regulation 4.4 specified content:

1. Date of the exchange [might be just time period/ month]
2. Direction of the exchange (incoming or outgoing)
3. Sending Peppol Service Provider
4. Receiving Peppol Service Provider
5. Peppol Dataset Type (Document Type ID)
6. Transport protocol used
7. Country of sender [should be from SBDH, requirement rest until then]
8. Country of receiver [should be from SBDH, requirement rest until then]

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Transaction reporting some comments

"Requested data is not available in the SBDH..."

"Continue with today's reporting [asis in Norway] of Number of transaction, Direction and Document type until it is sorted out how to solve this based on SBDH alone."

"Exclude Date of the exchange."

"The whole reporting of transaction statistics should be removed. This creates unnessary extra work for the SP with little to none value."

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Transaction reporting

- The ARTF seems to come to agreement to maintain requirement for some kind of central reporting of transaction statistics
- However, based on discussions so far:
  - Transaction reporting is reporting of statistics
    - Not to report down to single transactions (we have the CTC initiative for that)
    - We we aim at aggregating above transaction level
    - No endpoint ID etc
  - Volume per category per time period (month) seems most likely

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Transaction reporting

- Principles that we are trying to keep:
  - Stay out of the need for looking into the document content
  - Stay out of need for looking into any external sources/ registers etc
  - Use data as from:
    - the SBDH (the envelope/ Standard Business Document Header)
    - Data about time (most likely the month when transaction is run)
    - What SP/AP you exchanged transaction with
  - Country is wished for but not yet included in SBDH
    - Suggestion: add country codes to SBDH.
      - With some luck this could be available when policy takes effect
      - Most likely we pause this requirement until available in SBDH

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Transaction reporting

- Format/ channel etc is discussed but not decided about
  - Make a BIS for reporting content?
  - API?
  - Other?

- This central reporting has as one of its important goals also to substitute local/PA reporting requirements
  - And we have confirmation from some PAs that they plan to discontinue local arrangements when this is in place

- More details and conclusions on End User and transaction reporting in September

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Inclusive

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