

# ARTF comment resolution

- End User Identification
- End User reporting
- Transaction reporting

Trond Ausdal

ARTF participant

APP CMB member (Agreements, Policies and Procedures)

15.09.2021



# 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

# End user reporting

Topic	Comments	Severe Objections
End User Identification	47	29
End User Reporting	35	24
Data Usage	5	0
Transaction Reporting	19	4
SP Identification		
<b>Total</b>	<b>106</b>	<b>57</b>

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

# End User Identification (text from current IR)

## 3.3 End User Identification

### 3.3.1 Information to be Collected

Peppol Service Providers shall ensure that the following information is known for all End Users (senders and receivers) to which they provide Peppol services directly or indirectly through intermediaries. As an exception, Service Providers that offer Capability Lookup Services exclusively are not responsible for End User identification, unless they have a direct contract with them:

1. Legal identifier of the End User in the jurisdiction within which it is legally based, and legal identifier Type (e.g.e.g., VAT number, company registration number).
  - a. The legal identifier has to be active, in jurisdictions when such distinction exists
  - b. In case of End Users that are public organisations and where legal identifiers as such do not exist, other officially issued codes are acceptable.
2. ~~Legal form of the End User~~
3. Legal name of the End User, in the jurisdiction within which it is legally based.
4. Legal address, including as a minimum country and (where applicable) territory information.
5. ~~Name and identifier of the legal representative of the End User, authorised to act on its behalf.~~
6. End User's capability to receive and/or send Peppol Dataset Types (Document Type ID).
7. All Peppol-identifiers used in the Peppol Network by the End User, related only to the Peppol Services which that particular Service Provider offers to them. If

these are associated with different trade names or legal entities within the same organization, associations must likewise be mapped.

8. Contact information sufficient for the End User to be reachable by the Service Provider. ~~Name and contact details for End User representative(s) responsible for the Peppol Service, at a minimum, email address.~~
9. Proof of ownership – i.e.i.e., that the information has been provided by the entity it concerns.
10. Which intermediaries, if any, intermediate the End User's access to the Peppol Services. The following information must be known about each intermediary:
  - a. Legal identifier of the Intermediary in the jurisdiction within which it is legally based, and legal identifier Type (e.g.e.g., VAT number, company registration number).
  - b. Legal name of the Intermediary, in the jurisdiction within which it is legally based.
  - c. Country and (where applicable) territory where the intermediate is legally based.¶
  - d. ~~Legal address of the Intermediary, including country and (where applicable) territory information.~~

# End User Identification (text from current version IR)

Service Providers must verify the above information concerning End Users to which they provide Peppol Services, except in cases when this is not feasible with reasonable efforts. Such cases may include, but are not limited to, the lack of automated means to retrieve or verify End User information through lookup or API connection to authoritative sources of information in specific jurisdictions. **Service Providers may not be held accountable for lack of proactive verification when they can demonstrate that this was not feasible with reasonable effort.**

If and when it comes to the attention of a Service Provider that one of their End Users is trading under names different from its legal name, these ~~must~~ **may** be documented ~~and reported as well~~. In particular, when the Service Provider becomes aware that different trade names, business units, etc. are associated with different endpoints, this ~~must~~ **should** be adequately documented.

The Service Providers remain responsible for the correctness of End User information ~~at all times~~ **for the time during which they provide Peppol Services to them**. End User information shall be collected and verified at the time of enrolment in the Peppol Network ~~and when it changes~~. **Furthermore,** ~~and~~ it must be periodically checked at least on an annual basis, provided that mechanisms to that effect are available, ~~e.g.e.g.~~, through lookup or API connection to authoritative sources of information in specific jurisdictions.

**For the avoidance of doubt, this clause does not require the Service Providers to make such checks for each transaction or more generally in runtime.**

# End User Reporting (text from current version IR)

## 4.3 Service Provider Reporting about End Users

Peppol Service Providers must ensure that the following sub-set of the information collected as part of the End User Identification Policy in clause 3.3.1 has been reported each month to the PCA via the mechanism described in the OpenPeppol Operational Procedures:

1. Legal identifier of the End User in the jurisdiction within which it is legally based, and legal identifier Type (e.g., VAT number, company registration number).
2. Legal name of the End User, in the jurisdiction within which it is legally based.
3. Country and (where applicable) territory of the End User's legal address only.
4. End User's capability to receive and/or send Peppol Dataset Types (Document Type ID).
5. All identifiers used in the Peppol Network by the End User, **related only to the Peppol Services which that particular Service Providers offers to them.**
6. Where intermediaries are both actively involved in the transmission of the End Users' Peppol Services and hold a contractual relationship with the End User as described in the SP Agreement clause 9.2, the following information must be reported about each intermediary:
  - a. Legal identifier of the Intermediary.
  - b. Legal name of the Intermediary.
  - c. Country and (where applicable) territory where the intermediate is legally based. **Country and (where applicable) territory of the Intermediary's legal address only.**

### Special provisions:

- **The provision stated in section 3.3.1 on End User identification and verification of information feasibility with reasonable effort apply to the ~~the~~ obligation of Service Providers to report such information in accordance with this section.**
- Reporting information on intermediaries, as foreseen under point 6 above, is optional and may be made mandatory in specific jurisdictions subject to Peppol Authority Specific Requirements
- The provisions of this section do not apply to Service Providers that offer Capability Lookup Services exclusively

~~Peppol Service Providers must ensure that information about End Users, as specified in the Entity Identification Policy, shall be acquired and shall be regularly reported to the Peppol Coordinating Authority, which shall make it available, in whole or in part to the Peppol Authorities which have territorial jurisdiction over the country or territory where the End Users are based.¶~~

~~The information thus reported shall be at a sufficient level of detail that it is possible for the Peppol Coordinating Authority to reconstruct the topology of the network from Service Provider to End User — i.e. which End User is served by which Service Provider and for which Peppol services, either directly or through an Intermediary party.¶~~

~~Reporting shall be made on a monthly basis. The reporting mechanism to be used by Service Providers and the Peppol Coordinating Authority is described in the OpenPeppol Operational Procedures¶~~

# End user reporting

- After comments and discussions, what changes were we able to agree to:
  - Regarding info to be collected when verifying End User
    - Took away “nice to have info” and tried to remain only with “need to have” info (relevant for KYC)
  - Regarding reporting
    - Less info to report:
      - Ref above (less data required to collect with KYC process)
      - Reporting intermediary per End User is optional (may be PA specific requirement)
      - Reporting all end point IDs in use by End User but only those related to You as SP
    - Added text that also for reporting it is what is “feasibility with reasonable effort”
      - I.e. it can be hard (at least as of today) to keep track on what each sender are able to send at any time. Report to best effort (ie, what you have seen the sender do).
- Why is it good:
  - As basis, we think it is a good idea to KYC, then most of that info is relevant
  - prepare us for SMP listing senders
  -
-

# End user reporting

- Quite some of us SPs did not see much benefit or need for End User reporting
- But then, is there at all any good in End User reporting, seen from a SP perspective? Any reasoning on why this can be done?
  - As basis, we (SPs in the ARTF) think it is a good idea to focus and strengthen KYC requirements.
    - Then it is not that easy to for fraudsters to register, not that easy to just “steal” other operators customer etc).
    - So then, when doing KYC anyway, we obtain info about End Users that *can* be reported.
  - We do already report our receivers and we are able to relate to that
    - Via SMP to Peppol Directory
  - By reporting all end users we prepare us for SMP listing senders:
    - We think this will benefit End Users, us SPs and Peppol
      - Easier for buyer to find electronic trade partners. Sellers makes themselves more visible. That is good for both sellers and buyers.

I came to the conclusion to be able to accept this when the requirements for what to report was reduced and requirement for accuracy got handable (*feasonable with reasonable effort*).



# Transaction Reporting

## 4.4 Service Provider Reporting on Transaction Statistics

To monitor the evolving use of the Peppol Network, OpenPeppol needs to collect information about the Peppol Dataset Types actually being exchanged over the Peppol Network, considering each such exchange as a transaction between End Users. This information must be reported by Service Providers according to the provisions of this Policy.

Only statistical information based on metadata from the SBDH will be collected and reported to OpenPeppol under this Policy. No information from the actual business content of individual datasets will be reported.

The Peppol Service Providers are responsible for ensuring that the relevant data can be collected in an accurate and reliable manner, using whatever methods the Peppol Service Provider deems most efficient in its own infrastructure and operational environment

The data reported must be entirely anonymous and thus not linkable to any natural persons, including any (contact persons of) End Users.

Information related to actual datasets exchanged over the Peppol Network for both sent and received datasets must be collected and reported based on the following parameters:

1. ~~Date~~ ~~Timing~~ of the exchange

98. Direction of the exchange (incoming or outgoing)

99. Sending Peppol Service Provider

100. Receiving Peppol Service Provider

101. Peppol Dataset Type (Document Type ID)

102. Transport protocol used

103. Country of sender

104. Country of receiver

The exact format of aggregated statistics to be provided by Service Providers will be defined in the technical specification of the Transaction Statistics Report, based on the data scope listed above and in line with the provisions of this session. The Digital Traffic Report specification will be introduced through the procedures foreseen in the Change Management Policy in Chapter 2.

Specific provisions and clarification on data to be reported:

- Timing of the exchange ref of this section refers to the reporting period – exact date and time of transactions does not need to be reported.
- Information on country of sender and receiver shall be part of the reporting obligation only after a change in the Message Envelope specification (e.g., SBDH) is adopted and implemented by Service Providers
- Information on the sending and receiving Service Provider is expected to be pulled from the transmission session.

Suggestion is “which month” (so not timestamp)

# Transaction reporting

Internal Regulation 4.4 specified content:

1. Timing ~~Date~~ of the exchange changed to exchange time period (so not timestamp or date)
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]

See previous page: **Information on country of sender and receiver shall be part of the reporting obligation only after a change in the Message Envelope specification (e.g., SBDH) is adopted and implemented by Service Providers**

# Sum up

- Some of us SPs did not at all like some of the requirements, ie related to reporting
- Now, the requirements have been changed
  - not to everybody's full satisfaction
  - and we have had quite some discussion in the ARTF
- However, we can see some reasoning and good even with the reporting requirements.

The current proposals was supported by us SPs in the ARFT as a negotiated result that we think is in all good solutions for Peppol, End Users and us SPs.



Entrepreneurial

Responsible

Dedicated

Inclusive