



Peppol

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Migration Plan

OpenPeppol Internal Regulations Part II
- Use of the Peppol Network,
version 2.0.0

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1 Introduction

An updated version of the **OpenPeppol Internal Regulations Part II - Use of the Peppol Network**, version 2.0.0, was approved by the OpenPeppol Management Committee on November 29, 2023.

The procedure for implementing a new version of the IR is outlined in section 2.3.5 in the current IR (v 1.0.1 approved on 21.06.2022). These provisions mandate that a migration plan must be developed to support the implementation of the updated version but does not prescribe any minimum time for new provisions to take effect.

This document provides the approved Migration Plan for implementation of the Internal Regulations Part II – Use of the Peppol Network, version 2.0.0.

2 Removing the Semantic Versioning annex

The Semantic Versioning annex has been deleted from the IR as requested in RFC AC-11. This RFC resolution was approved by the APP CMB in its meeting on April 24, 2023.

When assessing the RFC, the APP CMB took note of the fact that the Semantic Versioning annex in the IR is not in effect. No work has been carried out or is being planned on the subject.

Impact assessment

The changes implemented are considered to have no impact on any part of OpenPeppol or its members, because the Semantic Versioning Annex was never in force – its applicability had been suspended in v1.0.1.

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This change takes effect on the date of publication of the revised IR.

3 Change Management Policy (IR section 2)

As a consequence of implementing resolutions at a more detailed level of the Change Management (CM) Policy, the structure of the CM policy has been amended and now contains the following sub-sections:

1. Introduction
2. Overarching governance provisions – new section added
This new section has been added in response to RFC AC-10. The RFC recognises that, in the current IR, provisions related to overarching governance provisions and RFC processing is defined separately for each type of artefact. The RFC further notes that the actual content in these provisions is to a large extent similar, although the language is tailored to the type of artefact.
3. RFC processing – New section added
A new section has been added in response to RFC AC-10. This new section consolidates provisions related RFC handling previously repeated for each type of artefact.
4. Provisions for Technical Artefacts
Some provisions previously contained in this section has been generalised and moved into sections 2.3 (Overarching governance provisions) and 2.4 (RFC processing). In addition, editorial changes have been implemented to improve the language and clarity of the provisions in the IR.
5. Provisions for Internal Regulations

Some provisions previously contained in this section has been generalised and moved into sections 2.3 (Overarching governance provisions) and 2.4 (RFC processing). Furthermore, in response to RFC AC-12 requesting the creation of a separate section for change management of Operational Procedures, the provisions in this section have been updated to only apply for Internal Regulations, implying that all references to Operational Procedures have been deleted.

6. Provisions for Operational Procedures – New section added

This new section has been added in response to RFC AC-12. The RFC resolution recognises that the current procedures defined for Operational Procedures are too strict and does not provide for the agility needed for efficient adjustments to OPs.

7. Provisions for Peppol Agreements

Some provisions previously contained in this section has been generalised and moved into sections 2.3 (Overarching governance provisions) and 2.4 (RFC processing). In addition, editorial changes have been implemented to improve the language and clarity of the provisions in the IR. On the substantive side, a new set of provisions have been added for Errata Corrigenda versions of agreements in response to RFC AC-9.

Impact assessment

The main benefits expected from the changes implemented are:

- A transparent, structured, and well-defined change management process for all type of artefacts contained in the Peppol Interoperability Framework.
- Common procedures for RFC handling allowing for efficient processes and development of an RFC register for all RFCs.
- A documented possibility for all members of OpenPeppol to submit an RFC against any component of the Peppol Interoperability Framework.
- Separate provisions for Operational Procedures that allow for agility and efficient adjustments at an operational level.
- A more efficient process for error corrections to agreement documents.

The changes implemented will have an impact on OpenPeppol and its different members as outlined in the below table.

OpenPeppol and member groups	Expected impact
OpenPeppol	<ul style="list-style-type: none"> Increased responsibility on the APP CMB, but no impact on the domain specific CMBs. The Operating Office gets more control on Operational Procedures.
Peppol Authorities	<ul style="list-style-type: none"> No impact.
Peppol Service Providers	<ul style="list-style-type: none"> No impact.
End Users	<ul style="list-style-type: none"> No impact.

The changes implemented are considered to have limited practical impact on process or workflow. As a result, no extensive migration is required.

Migration plan

This change takes effect on the date of publication of the revised IR.

4 Data Collection, Reporting and Usage Policy (IR section 4)

The Data Collection, Reporting and Usage Policy has been updated as requested in RFC AC-6. When assessing this RFC, it was recognised that changes are needed to properly reflect the legal obligations that follows from:

- Previously agreed constraints on the reporting of End User information,
- Use of the data collected through the Peppol Network Analytics, and
- Availability of data from the Peppol Directory.

In addition to renaming the policy to better reflect its content, the provisions contained in the policy have to a large extent been rewritten.

Impact assessment

The main benefits expected from the changes implemented are that they will:

- Ensure compliance with relevant data protectional and privacy laws and regulations.
- Provide a clear definition of scenarios (purposes) when collection of data/statistics is justified.

- Provide a clear link to the technical mechanisms used for reporting and data collection.

The changes implemented will have an impact on OpenPeppol and its different members as outlined in the below table.

OpenPeppol and member groups	Expected impact
OpenPeppol	<ul style="list-style-type: none"> • Clear definition of scenarios (purposes) when collection of data/statistics is justified. • Secures a mandate for implementation of mandatory reporting from Peppol Service Providers.
Peppol Authorities	<ul style="list-style-type: none"> • Will have access to relevant statistics on the use of the Peppol Network within their jurisdiction without the need for separate reporting mechanisms.
Peppol Service Providers	<ul style="list-style-type: none"> • Will be mandated to provide periodical statistical reporting on End Users and transactions handled through the Peppol Network • Ensures that only aggregated statistical data about End Users and transactions are reported. • Mandates that the data in the Peppol Directory is kept up to date.
End Users	<ul style="list-style-type: none"> • Ensures that statistics made available by OpenPeppol will not be linked to any identified person or legal entity. • Ensures that the data visible in the Peppol Directory is kept up to date.

The changes implemented are urgently needed to ensure compliance with relevant data protectional and privacy laws and regulations. Otherwise, the changes implemented are considered to have limited practical impact on process or workflow. As a result, no extensive migration is required. For the reporting on End User and transaction statistics there is however a dependency on the implementation of the new reporting mechanisms.

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This change takes effect on the date of publication of the revised IR. The obligation to implement the Reporting Mechanism will start at a date to be set by the Managing Committee (January 2024 being the first reporting month).

5 PA Specific Requirements (IR section 7)

As a consequence of updating provisions in the Data Collection, Reporting and Usage Policy (IR section 4), and the implementation of a centralised reporting regime, there was also a need to change the provisions related to the PASR category for Reporting on End User information and transaction statistics (IR section 7.4.3). The changes implemented asserts that a PA may not require specific reporting regimes as part of its PASR unless justified by local laws or formal regulations.

Furthermore, in response to RFC AC-4 several changes have been made to the provisions for change management and approval of new or updated PA Specific Requirements (IR section 7.5). Governance of PASR is now a two-step process where (1) the content of PASR is governed by the responsible PA while (2) the introducing a new/updated PASR in the Peppol Interoperability Framework (PIF) is governed by the APP CMB.

Impact assessment

The main benefits expected from the changes implemented are:

- A transparent, structured, and well-defined change management process for PASR.
- The change management process for PASR is equally applied for all PAs.
- All OpenPeppol members are given the opportunity to influence the evolution of PASR.

The changes implemented will have an impact on OpenPeppol and its stakeholders as outlined in the below table.

Stakeholder group	Expected impact
OpenPeppol	<ul style="list-style-type: none">• Transparency in maintenance of PASR.• Control over the introduction of new PASR in PIF.• Some increased work and responsibility in the approval of PASR.

Peppol Authorities	<ul style="list-style-type: none">• Control over the content of its PASR, within the limitations defined in the policy.• Some increased work and responsibility in the preparation and documentation of PASR.
Peppol Service Providers	<ul style="list-style-type: none">• Documented possibility to influence the content and approval process for PASR.
End Users	<ul style="list-style-type: none">• Documented possibility to influence the content and approval process for PASR.

The changes implemented are considered to have limited practical impact on process or workflow. As a result, no extensive migration is required.

Migration plan

This change takes effect on the date of publication of the revised IR.