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Release Notes

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.

This document provides a summary of the changes implemented in the updated version.

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 or is being planned on the subject.

Besides the actual deletion of the annex, implementation of this RFC has an editorial implication on the provisions related to releasing a new version of an existing Technical Artefact in section 2. 4 of the IR.

3 Restructuring of the Change Management Policy (IR section 2)

As a consequence of implementing an agreed resolution at a more detailed level of the Change Management (CM) Policy, the structure of the CM policy has been amended and a local table of contents added as section 2.1.

3.1 Policy Overview (IR section 2.1)

The CM policy now contains the following sub-sections:

1. Introduction
2. Overarching governance provisions
3. RFC processing
4. Provisions for Technical Artefacts
5. Provisions for Internal Regulations
6. Provisions for Operational Procedures

7. Provisions for Peppol Agreements

3.2 Introduction (IR section 2.1)

Editorial changes have been implemented to improve the language and clarity of the provisions in the IR.

3.3 Overarching Governance Provisions (IR section 2.2)

This new section has been added in response to RFC AC-10. When assessing the RFC, it was recognised that, in the current IR, provisions related to overarching governance provisions and RFC processing are defined separately for each type of artefact. It was further noted that the actual content in these provisions is to a large extent similar, although the language is tailored to the type of artefact.

The RFC resolution was approved by the APP CMB in their meeting on March 27, 2023, to simplify the text and provide for a common set of principles for all types of artefacts. This is expected to contribute to;

- A more simplified and streamlined process,
- Ease of understanding, and
- Ease the development and implementation of a common RFC register.

As part of the resolution for this RFC a table has been added to define which CMB is responsible for the governance of the different artefact of the Peppol Interoperability Framework.

3.4 RFC processing (IR section 2.3)

A new section has been added in response to RFC AC-10. The RFC resolution was approved by the APP CMB in its meeting on March 27, 2023.

This new section consolidates provisions related to RFC handling previously defined separately for each type of artefact. Separate provisions are provided for:

- Raising an RFC
 - Allowing any OpenPeppol Member or defined organisational entity in OpenPeppol to raise a Request for Change (RFC) related to any artefact in the Peppol Interoperability Framework at any time.
- Deciding on accepting an RFC
 - Mandating the responsible CMB to provide a justification in case an RFC is rejected.

- Processing an RFC
 - Mandating the responsible CMB to provide a resolution and an impact assessment for each RFC.
- Consultation on proposed RFC resolutions
 - Mandating the responsible CMB to conduct a consultation with relevant Domain or Stakeholder Communities directly affected for all RFCs other than errata corrections.
- Implementation of RFC resolutions
 - Allowing the responsible CMB to consolidate implementation of approved RFCs.
- Escalation
 - Defining the process for escalation in case of disagreement of the RFC resolution.

3.5 Provisions for Technical Artefacts (IR section 2.4)

Some provisions previously contained in this section have been generalised and moved into sections 2.2 (Overarching Governance Provisions) and 2.3 (RFC processing).

In addition, some editorial changes have been implemented to improve the language and clarity of the provisions in the IR.

This section now contains provisions for:

- Introduction of New Artefacts.
- Releasing a New Version of an Existing Technical Artefact.
- Migration to a New Release of a Technical Artefact.
- Removing a Technical Artefact.
- Minimum Time for Consultation and Implementation.

The substantive content of these provisions has not changed. Specific provisions have however been defined for urgent or alternative actions (section 2.4.5.2).

3.6 Provisions for Governance Policies (IR section 2.5)

This section has been renamed to cover governance policies in general and not only the Internal Regulations. Furthermore, some provisions previously contained in this section have been generalised and moved into sections 2.2 (Overarching Governance Provisions) and 2.3 (RFC processing).

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 to Governance Policies; implying that all references to Operational Procedures have been deleted.

In addition, some editorial changes have been implemented to improve the language and clarity of the provisions in the IR.

This section now contains provisions for:

- Introduction of New Policies.
- Releasing a New Version of an Existing Policy.
- Migration to a New Release of a Policy.
- Removing a Policy.
- Timeline for Consultation and Implementation.

The substantive content of these provisions as related to change management of policies has not changed.

3.7 Provisions for Operational Procedures (IR section 2.6)

This new section has been added in response to RFC AC-12. This RFC resolution recognises that:

- OPs, as the name suggests, are intended to provide a step-by-step description of how to handle repetitive processes, such as Issue Reporting and Management, Change Management, etc. Their focus is on defining who does what and in what order. They aim to provide transparency and ensure that the process can be carried out as efficiently and predictably as possible.
- The Change Management process for OPs, as currently defined in the IR, follows the same procedure as for changes to the IR itself. However, this process is too strict and does not provide the agility needed for efficient OPs.
- Therefore, it is proposed to add a separate section in the IR for change management for OPs.
- To provide the required agility, it is further suggested that the OO should be given authority to process any RFCs received, and that the APP CMB gives final approval of any new version of OPs without the need for a mandatory member review.

The merit of this RFC resolution was approved by the APP CMB in its meeting on March 27, 2023.

This section now contains provisions for:

- Processing and deciding on RFCs
 - Which will be done by the OO and approved by the APP CMB.
- Introduction of new Operational Procedures
 - Which will be developed by the OO and approved by the APP CMB. No member review is expected.
- Releasing a New Version of an Existing Operational Procedure
 - Which must be created by applying approved RFCs and presented to the APP CMB for approval.
- Migration of a New Release of an Operational Procedure
 - A new release of an Operational Procedure takes effect on the date announced, unless explicitly defined differently through a migration plan.
- Removing an Operational Procedure
 - Which must be approved by the APP CMB based on an RFC.

3.8 Provisions for Peppol Agreements (IR section 2.7)

Some provisions previously contained in this section have been generalised and moved into sections 2.2 (Overarching governance provisions) and 2.3 (RFC processing).

In addition, some 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. The resolution to this RFC recognises that:

- The current Change Management procedure for the agreements does not foresee a fast-track process for error correction.
- For the Errata Corrigenda version published in June 2022, the matter was escalated to the MC and handled as an exceptional case. At the same time, the need for a defined fast-track process for errata corrigenda and editorial changes to the Agreements was recognised and agreed for implementation in the next version of the Internal Regulations (APPCMB3).

The RFC resolution suggested implies that:

- Provisions related to errata corrigenda for agreements are added to the IR.
- The Errata Corrigenda process should only be applicable for error correction and non-substantive changes that do not affect the legal obligations or responsibilities of the contracting parties.

The merit of this RFC resolution was approved by the APP CMB in its meeting on December 5, 2022.

The provisions included for Errata Corrigenda to agreements as now included in the revised IR implies that:

- The APP CMB will do an initial assessment of received RFCs and classify each RFC according to its impact (Major release – Editorial revision – Errata Corrigenda release).
- For Errata Corrigenda releases:
 - The APP CMB will decide on the required corrections and no further review or consultation is expected.
 - The OO will inform affected actors as appropriate (i.e., PAC and SPC).
 - The OO will publish the updated agreement documents as part of the Peppol Interoperability Framework.
- Errata Corrigenda releases of agreements will take effect 20 days following the date of publication.

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 accurately reflect the legal obligations that follows from:

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

The merit of this RFC resolution was approved by the APP CMB in its meeting on May 10, 2023.

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

- Policy Overview
 - Outlining the content of the policy.
- Requirements from the Peppol Agreements
 - Providing the appropriate references to the Peppol Agreements.
- Data Collection Purposes

- A set of provisions allowing OpenPeppol to collect, aggregate and make available data on the use of the Peppol Network for strategic, operational and compliance purposes.
- Service Provider Reporting on End User Statistics
 - The provisions in this sub-section have been significantly rewritten to reflect agreed revisions to the End User statistics reporting requirements. The provisions now only allow for collection of aggregated statistical data that cannot be linked to any natural person or legal entity.
 - Furthermore, reference is made to the relevant technical specification on how the reporting must be done. This specification is subject to the Change Management provisions for Technical Artefacts.
- Service Provider Reporting on Transaction Statistics
 - In addition to several editorial changes, substantive changes have also been implemented to emphasise that:
 - only statistical information based on the content of the Peppol Business Message Envelope may be collected and reported; and
 - only aggregated statistical data that cannot be linked to any natural person or legal entity may be collected.
 - Furthermore, reference is made to the relevant technical specification on how the reporting must be done. This specification is subject to the Change Management provisions for Technical Artefacts.
 - Finally, this section also includes provisions that PAs will be given access to statistics on data that concerns End Users based in their own jurisdiction.
- Peppol Network Analytics
 - A new section containing provisions allowing OpenPeppol to collect and analyse data from the Addressing and capability look-up components in the Peppol Network.
 - This section also includes provisions that PAs will be given access to statistics on data that concerns End Users based in their own jurisdiction.
- Data Usage
 - A set of provisions for how the data collected may be used and published by OpenPeppol and PAs.
 - Under this version of the policy, it is not foreseen that SPs will be given access to specific data, other than what is generally made available by OpenPeppol.

- The Peppol Directory
 - A new section containing provisions related to the access and use of the data contained in the Peppol Directory. To comply with relevant data protection regulations these provisions impose a limitation on access to the Peppol Directory to persons who require it in order to use the Peppol Network and prevents an open download of information.
 - As part of these provisions there is a responsibility on SPs to ensure that the data reported to the Peppol Directory are kept up-to-date and comply with applicable law, including locally applicable data protection law.
- Data protection
 - A new set of provisions defining the role and responsibility of OpenPeppol as a data collector.

5 Service Provider Accreditation Policy (IR section 5)

No changes implemented.

6 Information Security Policy (IR section 6)

No changes implemented.

7 Peppol Authority Specific Requirements (IR section 7)

7.1 Constraining the use of PASR for reporting on End User information and transaction statistics (IR section 7.4.3)

As a consequence of updating provisions in the Data usage and Reporting policy (IR section 4), and the implementation of a centralised reporting regime, there is also a need to make changes to the provisions related to 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.

7.2 New provisions for change management of PA Specific Requirements (IR section 7.5).

A new set of provisions have been added for approval and change management of PA Specific requirements in response to RFC AC-4.

The merit of this RFC was approved by the APP CMB in its meeting on January 30, 2023.

The provisions included for approval and change management of PA Specific Requirements are:

- Overarching Governance Provisions
 - PASR must be subject to a controlled lifecycle management process.
 - Governance of PASR is a two-step process:
 - The content of PASR is governed by the responsible PA,
 - Introducing a new or updated PASR in the Peppol Interoperability Framework (PIF) is governed by the APP CMB.
 - Governance of PASR must allow for adequate involvement by all OpenPeppol members affected.
 - PASR may contain informative annexes not subject to change management.
- Introduction of a new or updated version of PA Specific Requirements
 - The responsible PA must create a new version (major/minor/amendment) based on approved RFCs.
 - The responsible PA should consult with OpenPeppol members active within its jurisdiction.
- Submitting a new or updated version of PA Specific Requirements for introduction as part of the Peppol Interoperability Framework
 - Proposal to include a new version in PIF must be raised as RFC by the Responsible PA.
- Approval of a new or updated version of PA Specific Requirements as part of the Peppol Interoperability Framework:
 - New versions must be subject to Compliance Review by the OO.
 - New major or minor versions must be made available for a 4-week review by OpenPeppol members.
 - The decision to implement a new version in PIF shall be taken by the APP CMB.

- Disagreement on a decision may be escalated to the OpenPeppol MC.
- Releasing a new or updated version of PA Specific Requirements
 - Publication of new versions as part of PIF is done by the OO.
- Migration from an old to a new version of PA Specific Requirements
 - Every release of PASR must be supported by a migration plan.
- Timeline for Consultation and Implementation
 - A minimum time of 4 weeks must be allowed for consultation on RFC resolution as well as for in introduction of a new version of PASR.

8 Extended Use of Peppol (IR section 8)

No changes implemented.

9 Compliance Policy (IR section 9)

No changes implemented.