

**ANSWERS TO THE EUROPEAN CENTRAL BANK/
EUROSYSTEM
TERMS OF REFERENCE FOR THE SEPA COMPLIANCE OF
CARD SCHEMES**

17 April 2009

The Eurosystem supports the creation of the Single Euro Payments Area (SEPA) which will enable retail payments in euro to be made throughout the euro area under the same basic conditions. Card payments represent an essential part of retail payments and card schemes are an important element of the SEPA project.

Against this background and acting as a catalyst, the Eurosystem has defined the SEPA compliance for card schemes as the fulfilment of the criteria contained in the SEPA Cards Framework (developed by the European Payments Council, EPC) and of the criteria included in the Eurosystem's "Cards Report" of November 2006. Card schemes must fulfill these criteria in order to be considered, by the Eurosystem, to be SEPA-compliant.

To achieve the desired transparency, the Eurosystem expects card schemes aiming to meet the SEPA compliance criteria to conduct a self-assessment and to make the answers to the questions publicly available on their websites by end-June 2009, using the table at the end of this document. The *sub-questions* (i.e. those in italics) are merely intended to help the Eurosystem gauge the degree of progress of SEPA migration and integration.

Cards schemes should communicate the answers to the sub-questions to the Eurosystem via the respective national central bank; the Eurosystem will treat the answers to the sub-questions confidentially as they may contain competitively sensible information. There is no requirement to publish answers to the sub-questions.

Self-assessments are the selected method of SEPA compliance assessment for card schemes, in line with the general spirit of SEPA which is an industry-driven project. The self-assessment should be repeated whenever the scheme rules and proceedings undergo significant changes. Card schemes should inform the relevant national central bank when the self-assessment is to be reviewed.

1. SEPA compliance Terms of Reference for card schemes

A. Scheme practices

1. The scheme’s rules should not prevent that merchants and cardholders¹ are offered the same service from the scheme, wherever the scheme operates in the euro area –that various add-ons (i.e. the various additional functionalities to the basic card and terminal functions) should not hamper interoperability. (November 2006 report)

1.1 Is it ensured that scheme rules do not prevent that merchants and cardholders are offered the same service from the scheme, wherever the scheme operates in the euro area?

Answer:

Yes. The German banking industry operates the “German ATM system” as well as the debit POS-system “electronic cash”. The underlying agreements do not contain any geographical limitation to the participation of banks and/or service providers Accordingly access to both schemes managed by Zentraler Kreditausschuss is open to any bank, regardless, whether it is located in Germany or outside Germany. Banks in Germany become member of the schemes via their associations, which are partners of the agreements, constituting the respective systems. With the transposition of the PSD into national law, access to these schemes will be open to payment institutions as well.

The agreements constituting the schemes managed by Zentraler Kreditausschuss are publicly available at no cost. Accordingly, the participation criteria in the schemes managed by Zentraler Kreditausschuss are transparent and non-discriminatory. In particular, they do not distinguish between banks subject to supervision in Germany, and banks subject to supervision by supervisory bodies from other SEPA countries, and conducting their business in other SEPA countries.

1.2 Is it ensured that scheme rules (especially those related to technical and business aspects) do not prevent that cards of other schemes are used at terminals where the cards of your scheme are accepted, despite the various add-ons (i.e. additional features to the basic payment function) offered by your scheme on cards and terminals?

Answer:

Yes. As long as the security requirements of another scheme are not in conflict with the security requirements of the schemes managed by Zentraler Kreditausschuss, the acceptance of cards of other

¹ In this document, merchants and cardholders means merchants and cardholders located in SEPA and carrying SEPA-issued cards.

schemes is not prevented at terminals where cards of the schemes managed by Zentraler Kreditausschuss are accepted.

a. *What add-ons have been activated in your scheme, if any?*

None.

2. A scheme should be compliant with the transposition into national law of the PSD provisions about surcharging.² (November 2006 report)

Is the scheme compliant with the transposition into national law of the PSD provisions about surcharging?

Answer:

Yes.

Dependent from the transposition of the PSD into German law, surcharging will be allowed from November 2009 onwards in the debit POS-system “electronic cash”.

a. *Is the scheme allowing surcharging?*

Dependent from the transposition of the PSD into German law, surcharging will be allowed from November 2009 onwards in the debit POS-system “electronic cash”.

b. *Has the scheme always allowed surcharging? Or is this a result of the transposition of the PSD into national law?*

The allowance of surcharging is a result of the transposition of the PSD into national law.

c. *In the knowledge of the scheme, is surcharging taking place in practice?*

Not yet.

d. *Do you impose an “honour-all-card”s rule (i.e. the acceptance of all valid card of scheme, irrespective of the type of card)?*

The schemes managed by ZKA are based on a single type of cards participating to the schemes.

² According to the PSD: “In order to promote transparency and competition, the payment service provider should not prevent the payee from requesting a charge from the payer for using a specific payment instrument. While the payee should be free to levy charges for the use of a certain payment instrument, Member States may decide whether they forbid or limit any such practice where, in their view, this may be warranted in view of abusive pricing or pricing which may have a negative impact on the use of a certain payment instrument taking into account the need to encourage competition and the use of efficient payment instruments.”

e. *Do you have rules regarding the interchange fees that apply to cross-border issuing and acquiring (e.g. rules stipulating that in the cases of cross-border acquiring, apply the interchange fee levels of the country of the merchant should be applied)?*

No. The debit POS system electronic cash is not based on an interchange, but on a fee to be paid by the card acceptor to the card issuer (Händlerentgelt).

3. Card schemes must ensure that merchants (or ATM owners) are not prevented from accepting any card from another SCF compliant scheme. (SCF)

Are merchants or ATM owners accepting the cards of your scheme free to accept any card from another SCF compliant scheme?

Answer:

Yes.

4. SCF compliant schemes may not mandate any certification (certification of cards, terminals and/or network interfaces) to be performed only by a proprietary (owned or controlled by the scheme) certification body. (SCF)

Does your scheme allow certification of cards, terminals and network interfaces to be performed by certification bodies which are not proprietary?

Answer:

Yes. The schemes managed by Zentraler Kreditausschuss accept certifications from different bodies, e.g. EMVCo or certification bodies for other schemes in Europe, for the approval of payment system components, as long as the underlying criteria of a certification match with the approval criteria of Zentraler Kreditausschuss. The final approval rests with the scheme.

a. *Have cards, terminals and/or network interfaces of your scheme been certified by different certification bodies? Have any problems been encountered with the procedure? Do you consider the certification procedure sufficiently flexible?*

Yes, mutual acknowledgement of certifications is being piloted with other certification bodies in Europe and it is envisaged to come to a common basis for a broader mutual acknowledgement of certifications via the CAS initiative. On the functional side, EMVCo certifications are taken into account. Up to now, no problems have been encountered with the procedure agreed on with other schemes. Further improvement will be achieved with the implementation of the CAS results.

5. Any transfer of personal data³ in a non-aggregated form to countries that are not compliant with the EU rules should be avoided. (November 2006 report)

Is any transfer of personal data in a non-aggregated form to countries that are not compliant with the EU rules avoided?

Answer:

Yes.

a. Please explain how compliance with EU legal requirements on data transfer is achieved?

The payment scheme rules require service providers contractually to use transaction data only for the purpose of processing the specific transaction. Furthermore, the data processed in the schemes do not contain any individual-related data, but only data, which can be related to individuals only if further data, which are not part of the transaction data, are taken into account.

B. One-off measures for schemes

6. A scheme should effectively remove from its rules clauses that function as commercial barriers to SCF compliance (e.g. a requirement to be member of the scheme in order to operate in a country). (November 2006 report)

Is it ensured that the scheme's rules do not include any clauses that function as commercial barriers to SCF compliance?

Answer:

Yes.

a. Please describe which commercial barriers have been removed and how. Are there any remaining commercial barriers? Please describe.

As explained in the answer to question 1.1, the schemes managed by Zentraler Kreditausschuss were already designed in a way that there were no geographical limitations to their usage and that there were not specific access criteria for banks or service providers, which could be considered as a commercial barrier. Accordingly, no commercial barriers had to be removed.

7. Medium to long term plans of the scheme should not contradict the objectives of SEPA as a high-level requirement. (November 2006 report)

³ See Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data

Is it ensured that the medium to long term plans of the scheme are not contradicting the objectives of SEPA as a high-level requirement?

Answer:

Yes.

8. Each card scheme will make available to its participants – and upon request to overseers - a set of operational quality benchmarks, and how they are policed. (SCF)

8.1 Has your scheme made available to participants its set of operational quality benchmarks (e.g. system availability, maximum time foreseen for transaction authorisation)?

Answer:

Yes. Operational quality (e.g. processing times of terminals) is measured. However no benchmarks have been set in order to stipulate permanent technical improvement based on the competition of manufacturers. Accordingly only the concept for measuring of processing times has been published. The implementation of further quality benchmarks with regard to the availability of the network is foreseen.

8.2 If requested, has your scheme made available to overseers its set of operational quality benchmarks?

Answer:

Up to now, the scheme had not been requested to make operational quality benchmarks available to overseers.

a. What does this set include?

Not applicable

9. A scheme should implement a separation of SEPA card schemes' brand governance and management from the operations that have to be performed by service providers and infrastructures without any possibility for cross-subsidisation. (SCF, November 2006 report)

Is there a separation within your scheme of the scheme's brand governance and management from the operations (i.e. authorisation, clearing and settlement) that have to be performed by service providers and infrastructures without any possibility for cross-subsidisation?

Answer:

Yes.

How has this separation been implemented? At legal level? At financial level? At information level? Please describe.

The scheme's brand governance and management is with Zentraler Kreditausschuss, a common body of the banking associations who have signed the agreements for setting up the schemes, managed by Zentraler Kreditausschuss. Neither Zentraler Kreditausschuss nor one of the associations is providing any operational service in these schemes. The provision of operational services is left to technical service providers who have to be approved by Zentraler Kreditausschuss based on open and transparent approval conditions and who are acting in competition. The schemes managed by Zentraler Kreditausschuss do not mandate the usage of specific technical service provider.

10. Acquiring or equivalent in every scheme must be open to competition between acquirers or equivalent. (SCF)

Is acquiring or equivalent in your scheme open to competition within SEPA, i.e. can various acquirers or equivalent compete between them throughout SEPA?

Answer:

Yes. The schemes managed by Zentraler Kreditausschuss are de jure based on a 3-party model, which de-facto materialises as a 4-party model with a maximum of competition on the acquiring side. The provision of terminals and technical services is managed by technical service providers (Netzbetreiber) and the provision of collection services is provided by all banks participating to the scheme in competition between each other.

a. Was this always the case or have changes been introduced?

This has been always the case.

C. Licensing – scheme participation

11. To qualify under the dispositions of the SCF, each card scheme must allow banks and payment institutions to participate on the basis of transparent, non-discriminatory criteria. In particular, these criteria may no more distinguish between banks subject to supervision in the same country as the country of registration of the said card scheme, and banks subject to supervision by supervisory bodies from other SEPA countries, and conducting their business in the other SEPA countries. Furthermore, these criteria may no more distinguish between payment institutions subject to supervision in the same country as the country of registration of the said card scheme and payment institutions subject to supervision by supervisory bodies from other SEPA countries, and conducting their business in the other SEPA countries. (SCF)

11.1 Are the criteria for participation in your scheme transparent and non-discriminatory?

Answer:

Yes.

11.2 Does your scheme apply the same access criteria for participation to all banks within SEPA?

Answer:

Yes

11.3 Does your scheme apply the same access criteria for participation to all payment institutions within SEPA?

Answer:

Yes. The participation of payment institutions will be allowed from November 2009 onwards with the transposition of the PSD into German law.

a. Are any of the members of your scheme payment institutions? If not, have payment institutions expressed interest in becoming members of your scheme?

No and ZKA has not received any request of a payment institution to become member of one the schemes up to now.

b. What are or will be the main differences in access criteria for payment institutions as compared with those applicable to banks?

There will be no differences.

12. All SEPA banks and payment institutions must be able to offer basic card payment products and services throughout SEPA on the basis of a single license or comparable agreement from each card scheme without the requirement to obtain individual licenses or comparable agreements for each SEPA country. (SCF)

Is a single license or comparable agreement of your scheme sufficient to offer basic card payment products and services throughout SEPA?

Answer:

Yes.

In the scheme's knowledge are there members of your scheme actively issuing cards and acquiring card transactions in other countries?

Answer:

Yes.

13. At their discretion, banks and payment institutions must be able across SEPA to enter solely into an issuing licence. (SCF)

Are banks and payment institutions participating in your scheme able to act as issuers only?

Answer:

Yes. None of the schemes managed by Zentraler Kreditausschuss requires participating banks to participate at the same time as issuer and as acquirer. Participating banks are able to offer their services across SEPA only for issuing or only for acquiring activities.

14. At their discretion, banks and payment institutions must be able across SEPA to enter solely into an acquiring licence. (SCF)

Are banks and payment institutions participating in your scheme able to act as acquirers only?

Answer:

Yes. None of the schemes managed by Zentraler Kreditausschuss requires participating banks to participate at the same time as issuer and as acquirer. Participating banks are able to offer their services across SEPA only for issuing or only for acquiring activities.

15. A scheme may not require the use of any particular provider of processing services as a condition for participation. (SCF)

Are banks/payment institutions able to participate in your scheme without being required to use a particular provider of processing services?

Answer:

Yes.

D. Transaction features

16. All transactions are to be authorised by the issuer, either on-line, or off-line by the chip. (SCF)

Are in your scheme all transactions – except for exceptions such as some low value transactions or specific environments such as tollways – authorised by the issuer, either on-line or off-line by the chip?

Answer:

Yes

17. All ATMs will offer English as well as the national language(s) and any other languages regarded as appropriate by the ATM owner. (SCF)

Is it inscribed in the scheme's rules that all ATMs accepting cards issued under your scheme, offer at least English as well as the national language?

Answer:

Yes.

18. Where several payment applications are contained in the same card and supported by the same terminal, cardholders and merchants will have the choice of which payment application they will use. (SCF)

Is it ensured that scheme rules do not prevent that both the cardholder and merchant have the choice of which payment application (e.g. debit or credit or choice among different schemes and brands) is used out of several ones contained in the same card and supported by the same terminal?

Answer:

Yes. The choice of applications offered to cardholders and merchants takes into account the contractual provisions between the cardholder and the issuer and between the acquirer and the merchant.

a. Are you aware of any practical difficulty in your country or elsewhere where the cardholder or the merchant is prevented from choosing the payment application to be used? Please describe.

No.

E. Pricing, fees

19. Card schemes commit to provide their participants with SEPA-wide, transparent pricing structures ("scheme fees"), that will endeavour to allow for participation by the greater number of banks and payment institutions (without this intending to prevent commercial flexibility to conclude business deals in order to capture business opportunities e.g. through rebates). In this context "transparent" shall mean that the nature of the service of activity thus remunerated is unambiguous for the scheme participant or user: prices may not be presented in a bundled manner when referring to services or activities of a different nature. (SCF)

Does your scheme apply a SEPA-wide, transparent pricing structure?

Answer:

Yes.

- a. *Have you made your services and pricing structure (including information about all eventual member fees, such as admission, periodical, transaction and package fees) publicly available?*

Yes.

20. An SCF compliant scheme is a scheme that allows unbundling of functions whilst applying the same pricing per card product to national euro and SEPA transactions of the same type. (SCF)

Does your scheme apply the same pricing on scheme members per card product for SEPA euro transactions and for national euro transactions of the same type?

Answer:

Yes.

- a. *Which difficulties did you face with establishing the same pricing?*

None

21. A scheme should disclose interchange fees and their calculation methodology, and submit them, if possible, to the relevant authorities. (November 2006 report)

21.1 Has the scheme disclosed interchange fees and their calculation methodology?

Answer:

Yes. The debit POS system electronic cash is not based on an interchange, but on a fee to be paid by the card acceptor to the card issuer (Händlerentgelt).

21.2 Has the scheme submitted interchange fees and their calculation methodology to the relevant authorities, in case this has been possible?

Answer:

Yes. The Händlerentgelt had been notified to the relevant competition authorities.

- a. *Which has been the response of the relevant authorities?*

The Händlerentgelt had been approved after notification.

22. A scheme should have a single interchange fee (if any) for the whole euro area within a given brand in the long run. (November 2006 report)

Is it foreseen that in the long run there will be a single interchange fee (if any) level for the whole euro area?

Answer:

Yes. It is already implemented.

a. *Is the scheme currently defining interchange fee levels? Do these differ between geographical areas?*

No. There are no different Händlerentgelt levels per geographic area foreseen in the schemes managed by Zentraler Kreditausschuss.

b. *Which problems do you expect to encounter while setting a single interchange fee for the whole euro area?*

Not applicable.

F. Fraud strategy

23. A scheme should put in place a strategy on how to reduce fraud, especially cross-border fraud.
(November 2006 report)

Has the scheme put in place a strategy (e.g. technical rules) on how to reduce fraud, especially cross-border fraud?

Answer:

Yes.

a. *What are the main elements of this strategy?*

The strategy to reduce fraud is based on the consequent usage of a strong data authentication based on DDA-chips and a strong cardholder authentication via PIN.

b. *Is the strategy shared with other schemes?*

Yes.

c. *Can you identify areas of further co-operation between schemes in this field?*

The complete abandoning of magstripe transactions could be a further area for co-operation.

24. Card schemes acknowledge that preventing and fighting fraud is within the scope of the SCF. As a consequence, any adhering card scheme agrees to support prevention activities, in accordance with the EPC Resolutions on fraud. (SCF)

Is the scheme supporting fraud prevention activities in accordance with the EPC resolutions on fraud?

Answer:

Yes, as long as such resolutions are relevant for the security of schemes managed by Zentraler Kreditausschuss.

a. *Which measures has your scheme implemented in this context?*

Complete migration to a DDA-chip-based transaction processing until end of 2010.

b. Do you have any issue of concern with any of those EPC resolutions in the field?

The ongoing support of magstripe transactions by EPC after 2010 is not consistent with the aim of the EPC to migrate transaction processing completely to a chip-based environment.

G. Standards (including fraud prevention standards)

25. A scheme should contribute to the design of a consensus-based selection of standards with a clear commitment for implementation on time. (November 2006 report)

Is the scheme contributing to the design of a consensus-based selection of standards with a clear commitment for implementation on time?

Answer:

Yes.

a. Have you been informed on the content of the standards? Are you able to monitor work?

Yes. ZKA is actively participating to the development of these standards.

b. Have you been participating at the design and maintenance of standards?

Yes.

c. How do you assess work so far? Any problematic areas?

Whereas standardisation work is progressing well, the role of the EPC in the standardisation process has led to difficulties. Whereas there was a general agreement that the role of the EPC is restricted to the development of an overall business and functional requirements documents (the “Volume”) and that the development of detailed implementation specifications is left to the market, this approach seems to be questioned leading to new uncertainty in the already well-progressed development of implementation specifications.

d. Do you expect any problems with the implementation of standards?

No, not if all schemes using a specific standard are appropriately involved in the standardisation and certification process.

26. In particular all schemes will introduce a liability shift rule between magnetic stripe-based transactions and EMV-based transactions, and other incentivising measures to encourage the EMV migration. (SCF)

Has the scheme introduced a liability shift between magnetic stripe-based transactions and EMV-based transactions and potentially other incentivising measures to encourage the EMV migration?

Answer:

Yes. The Scheme has mandated a complete migration to a DDA-chip-based transaction processing until end of 2010.

a. Which other incentivising measures were introduced by the scheme?

None.

b. Which have been the effects of the introduction of the liability shift and potentially of other incentivising measures in terms of fraud prevention?

The effects in terms of fraud in the schemes managed by Zentraler Kreditausschuss are limited due to the high level of security of these schemes that has already been achieved before the EMV migration.

27. In order for the objectives of the SCF to be achieved, SEPA-level interoperability must be ensured in the following four domains:

- cardholder to terminal interface

- cards to terminal (EMV)

- terminal to acquirer interface (protocols or minimum requirements)

- acquirer to issuer interface, including network protocols (authorization and clearing). (SCF)

Is interoperability ensured for the domains of i) cardholder to terminal interface, ii) cards to terminal, iii) terminal to acquirer interface and iv) acquirer to issuer domains?

Answer:

Yes.

a. If not, what is the reason? Is there a problem with the standardisation work undertaken?

At current, there is no problem in the standardisation work undertaken.

28. Card schemes commit to make available to SEPA banks, payment institutions and card schemes, upon request, their terminal security requirements. Card schemes will engage in mutual recognition of type approval. Any terminal certified for SEPA transactions by a certification body in one SEPA country can be deployed in any SEPA country for acceptance of SEPA cards across all SCF compliant schemes. There may be no constraining, local requirement. (SCF)

28.1 Is the scheme ready to make available upon request to SEPA banks, payment institutions and card schemes its terminal security requirements?

Answer:

Yes

28.2 Is the scheme engaged in mutual recognition of certificates for type approval?

Answer:

Yes

28.3 Is it ensured that scheme rules do not prevent that any card, terminal and/or network interface, certified by an accredited body be deployed and used anywhere throughout SEPA⁴?

Zentraler Kreditausschuss is committed to this goal and contributes to it in the CAS initiative.

a. Have you faced any practical difficulty in the procedure?

Summary table of the “yes/no” answers to the above questions

Question	Answer: yes or no
1.1	<p>Yes. The German banking industry operates the “German ATM system” as well as the debit POS-system “electronic cash”. The underlying agreements do not contain any geographical limitation to the participation of banks and/or service providers Accordingly access to both schemes managed by Zentraler Kreditausschuss is open to any bank, regardless, whether it is located in Germany or outside Germany. Banks in Germany become member of the schemes via their associations, which are partners of the agreements, constituting the respective systems. With the transposition of the PSD into national law, access to these schemes will be open to payment institutions as well.</p> <p>The agreements constituting the schemes managed by Zentraler Kreditausschuss are publicly available at no cost. Accordingly, the participation criteria in the schemes managed by Zentraler Kreditausschuss are transparent and non-discriminatory. In particular,</p>

⁴ Question applicable once the certification framework for cards in SEPA has been established.

	they do not distinguish between banks subject to supervision in Germany, and banks subject to supervision by supervisory bodies from other SEPA countries, and conducting their business in other SEPA countries.
1.2	Yes. As long as the security requirements of another scheme are not in conflict with the security requirements of the schemes managed by Zentraler Kreditausschuss, the acceptance of cards of other schemes is not prevented at terminals where cards of the schemes managed by Zentraler Kreditausschuss are accepted.
2	Yes. Dependent from the transposition of the PSD into German law, surcharging will be allowed from November 2009 onwards in the debit POS-system “electronic cash”.
3	Yes
4	Yes. The schemes managed by Zentraler Kreditausschuss accept certifications from different bodies, e.g. EMVCo or certification bodies for other schemes in Europe, for the approval of payment system components, as long as the underlying criteria of a certification match with the approval criteria of Zentraler Kreditausschuss. The final approval rests with the scheme.
5	Yes
6	Yes
7	Yes
8.1	Yes. Operational quality (e.g. processing times of terminals) is measured. However no benchmarks have been set in order to stipulate permanent technical improvement based on the competition of manufacturers. Accordingly only the concept for measuring of processing times has been published. The implementation of further quality benchmarks with regard to the availability of the network is foreseen.
8.2	Up to now, the scheme had not been requested to make operational quality benchmarks available to overseers.
9	Yes
10	Yes. The schemes managed by Zentraler Kreditausschuss are de jure based on a 3-party model, which de-facto materialises as a 4-party

	model with a maximum of competition on the acquiring side. The provision of terminals and technical services is managed by technical service providers (Netzbetreiber) and the provision of collection services is provided by all banks participating to the scheme in competition between each other.
11.1	Yes
11.2	Yes
11.3	Yes. The participation of payment institutions will be allowed from November 2009 onwards with the transposition of the PSD into German law.
12	Yes
13	Yes. None of the schemes managed by Zentraler Kreditausschuss requires participating banks to participate at the same time as issuer and as acquirer. Participating banks are able to offer their services across SEPA only for issuing or only for acquiring activities.
14	Yes. None of the schemes managed by Zentraler Kreditausschuss requires participating banks to participate at the same time as issuer and as acquirer. Participating banks are able to offer their services across SEPA only for issuing or only for acquiring activities.
15	Yes
16	Yes
17	Yes
18	Yes. The choice of applications offered to cardholders and merchants takes into account the contractual provisions between the cardholder and the issuer and between the acquirer and the merchant.
19	Yes
20	Yes
21.1	Yes. The debit POS system electronic cash is not based on an interchange, but on a fee to be paid by the card acceptor to the card issuer (Händlerentgelt).
21.2	Yes. The Händlerentgelt had been notified to the relevant competition authorities.
22	Yes. It is already implemented.

23	Yes
24	Yes, as long as such resolutions are relevant for the security of schemes managed by Zentraler Kreditausschuss.
25	Yes
26	Yes. The Scheme has mandated a complete migration to a DDA-chip-based transaction processing until end of 2010.
27	Yes
28.1	Yes
28.2	Yes
28.3	Not applicable since the certification framework in SEPA has not been established yet. Zentraler Kreditausschuss is committed to this goal and contributes to it in the CAS initiative.