

Consumer Data Right

Data Standards Advisory Committee

Minutes of the Meeting

Date: Wednesday 9 March 2022

Location: Held remotely via WebEx

Time: 10:00 to 12:00

Meeting: Committee Meeting # 40

Attendees

Committee Members

Andrew Stevens, Data Standards Chair
Jill Berry, Adatree
Damir Cuca, Basiq
Peter Giles, CHOICE
Melinda Green, Energy Australia
Gareth Gumbley, Frollo
Chandni Gupta, CPRC

Jason Hair, Westpac
Rob Hale, TrueLayer
Richard Hough, ANZ
Lisa Schutz, Verifier
Aakash Sembey, Origin Energy
Stuart Stoyan, Fintech Adviser & Investor
Glenn Waterson, AGL

Observers

Barry Thomas, DSB
James Bligh, DSB
Ruth Boughen, DSB
Terri McLachlan, DSB
Michael Palmyre, DSB
Mark Verstege, DSB

Peter Crone, ACCC
Paul Franklin, ACCC
Claire Schwager, OAIC
Kate O'Rourke, Treasury
Jessica Robinson, Treasury
Elizabeth Kelly, Treasury

Apologies

Luke Barlow, AEMO
Chris Ellis, Finder

Joanna Gurry, NBN Co

Chair Introduction

The Data Standards Chair (**Chair**) opened the meeting and thanked all committee members and observers for attending meeting # 40.

The Chair would like to acknowledge the traditional owners of the land that each of us are on and he is pleased to acknowledge their elders past and present and those who are emerging.

The Chair would like to welcome Ms Elizabeth Kelly who is conducting the Statutory Review of the Consumer Data Right (**CDR**) and noted that Yi-Shen Lau who is from the Ministry of Business, Innovation & Employment is a last-minute apology. Yi-Shen is putting together New Zealand's policy response on how NZ would implement the CDR.

The Chair also noted that Commissioner Peter Crone from the ACCC will be joining the meeting from 11am. Commissioner Crone is responsible for CDR at the Commissioner level.

The Chair noted that the Data Standards Body (**DSB**) held a successful workshop on "Telecommunications: Introduction to the CDR" on 22 February 2022 which was attended by over 50 members of the CDR community. Some good questions were raised and there was a reasonable diversity of participants in attendance.

The Chair noted that Telstra have reached out to discuss their involvement in the Data Standards Advisory Committee (**DSAC**) and have put forward a proposed representative. When the Chair reconfigures the DSAC, in light of the designation of telecommunications, the Chair will be back in touch with them.

The Chair noted that the next DSAC meetings are scheduled for 13 April and 18 May, which are potentially in the window of the Federal Election. The Election may impact those meetings and the Chair suggests a potential shift to the face-to-face meeting in May.

The Chair noted that members Luke Barlow (AEMO), Chris Ellis (Finder) and Joanna Gurry (NBN) are apologies for this meeting.

Minutes

Minutes

The Chair thanked the DSAC Members for their comments and feedback on the Minutes from the 16 February 2022 Advisory Committee meeting. The Minutes were formally accepted.

Action Items

The Chair noted that Action Items will be covered off in today's meeting or are completed.

The Chair noted that Treasury (**TSY**) will be providing an update on the implications of the coming election and caretaker provisions and what they will mean for us. He has also asked if TSY could provide a further update on the Consumer Campaign.

The Chair noted that Elizabeth Kelly will talk about the CDR Statutory Review which will allow DSAC members to understand the review and how it will be conducted. The Terms of Reference are provided in the papers as Appendix B.

Working Group Update

A summary of progress since the last DSAC meeting on the Working Groups was provided in the DSAC Papers and was taken as read.

Technical Working Group Update

A further update was provided on the Technical Working Group by James Bligh and Mark Verstege as follows:

The DSB noted that the team are making a lot of progress on testing cases and documenting test cases as a way of explaining, elaborating and giving guidance on the standards. They hope to have something published for the community to review prior to the next DSAC.

The DSB noted that they are currently in maintenance mode, with a focus on energy, and are ensuring that those changes go through.

One member asked if the DSB could provide further clarification in regard to the test cases.

The DSB noted that they are receiving a lot of questions in Zendesk about specific scenarios which indicates that there is an interpretation issue of the standards in specific cases. Instead of just answering the questions in Zendesk the DSB decided to provide some test cases, not implementing test cases, but providing certified documentation like those expected by a test planner. Every time the Data Standards are updated the test cases will also be updated which will provide a baseline for comparison.

Consumer Experience (CX) Working Group Update

A further update was provided on the CX Working Group by Michael Palmyre as follows:

The DSB noted that TSY and DSB published the [CDR rules and standards design paper for telecommunications sector](#) on 1 March. The paper included some CX artefacts like wireframes, interactive prototypes and annotated queries.

The DSB wanted to call out the early thinking on the preliminary data language proposals that are referenced in the papers and are subject to further consultation based on the evolution of the rules and standards.

The DSB noted that they held the CDR 101 Workshop on 22 February. There was some really useful questions about secondary users and joint accounts which is a very complex issue.

The DSB noted that now they have a larger CX team, they've been able to release more CX artefacts, open-source assets, prototypes and revamped guidelines for things like disclosure consent, amending consent and default collection and use consent flow. They noted that the insight and trusted advisor consents are progressing and they're working closely with the other CDR agencies on some queries received during consultation.

The DSB noted that they've released the first energy sector related CX guidelines including some authentication guidelines that incorporate conventions and some unhappy paths for authentication, particularly in ways that tend to the provision in the energy rules which allows offline customers to share their data which is different to the banking sector.

One member noted that the legislation states that Trusted Advisors (TA) goes live 1 February. The member would like to go live now but are blocked because they can't update their user interface as the TA CX Guidelines aren't available. The member said there is a gap between when legislation says something is live and when they have the actual information and would recommend having a start date when everything is ready.

The DSB noted that it is a fair point and noted that their work needed to follow the settlement of the standards. They tend to release guidelines roughly three months after rules changes are made which allows time to develop artefacts and collaboration with other agencies.

The Chair asked the DSB if they could address the readiness of the guidelines and the matching of the guidelines to the standards in the TA areas at the weekly Implementation Calls.

ACTION: DSB to provide a weekly status updated on the Guidelines at the weekly implementation calls.

One member asked what approach is being taken in terms of CX for the different industry segments and are there still one set of guidelines across all the different industry segments or is it diverging? They then asked that if they are diverging, then have the core Data Standards and Guidelines on language been updated in order to ensure the same language can apply across many different industries.

The DSB noted that the intention for the guidelines is to be sector agnostic but they are banking specific at the moment as this was the initial sector. The DSB said when they refer to energy guidelines for example, it's not guidelines that are specific to energy, but rather tending to the accommodations that were made in the rules for energy. The DSB said they are genericizing it in a way that can be applied in all scenarios.

The DSB noted that in regard to the energy guidelines more broadly, they are not conducting a wholesale revamp of the guidelines, but there are areas in the dashboard tailoring for the energy sector and having something separate for banking. They are genericizing if further so instead of referring to transaction accounts, their genericizing the account name and adding additional information based on what they've seen as necessary to accommodate the energy sector differences.

The member further asked what is the recommendation for companies that have already implemented the original specifications and guidelines?

The DSB noted that the Guidelines, whilst they're referenced in the CDR Rules for participants to have regard to the Guidelines, the DSB makes it clear that the Guidelines are optional examples of how to implement. Every time they release a new CX artefact, similar to version releases of the Data Standards, it's effectively an update with the difference being that the guidelines aren't mandatory requirements in the same way as the standards. The DSB said there is a lot of optionality in the CX Guidelines and it's up to CDR participants to decide what they seek to comply based on their use cases.

Another member asked if these energy specific Guidelines have been published as yet?

The DSB noted that they will be adding a section to the CX guidelines that elaborates on data language and descriptions for energy because of the lower levels of comprehension for energy data.

The member asked about offline energy customers, as they are concerned about privacy and any relevant framework. They asked if this had been looked at as yet?

The DSB noted that this issue spans the CX Standards for authentication and InfoSec requirements and is something they want to look into further. The DSB said they need to understand what retailers are doing, and if more clarification is required, they ought to provide it.

The DSB noted that from the technical side, authentication introduces a problem because there isn't a specific online credential to use and the standards require a unique identifier of a particular customer. The DSB have tried in the standards to use language and the statements that basically allows the retailers flexibility in how they do it to match their existing obligations under privacy rules and existing industry rules without the standards getting in the way or trying to force them down a path that isn't appropriate. The DSB are conscious that they may have been too flexible and left too many things open to interpretation. The DSB said they have tried to be more flexible and leave the obligations with the retailers like they did with commercial & industrial (C&I) customers in banking.

The Chair asked what stage the DSB is up to in relation to the customer authentication for offline customers and can they explain the process?

The DSB noted that the first point of intervention is to provide an example of paths to support offline customers. With authentication and the larger issue of what a retailer is doing, the DSB are meeting with retailers to understand what is actually happening, what retailers are anticipating in relation to offline customers, how they authenticate, if there are gaps in what they're planning to do etc.

The ACCC noted that for offline customers, they assume that they'd be looking to create a path to move them to being an online customer rather than creating a whole offline experience around CDR as it doesn't make sense that we have a digital CDR and a parallel analogue solution.

The DSB noted that the TSY CDR Rules team did extensive consultation on this topic and it's a tricky one that will re-occur in future sectors. The DSB said the reason a lot of people don't have online credentials in energy is not because that they can't get them, as the same people have online credentials for banking, but it's often a compelling driver issue. The position that was landed on for eligibility by the TSY, explicitly acknowledged the fact that it would be a major barrier to CDR if you required an online login before sharing data. It was always expected that the CDR could be a compelling driver for consumers to get online credentials.

Stakeholder Engagement

A summary of stakeholder engagement including upcoming workshops, weekly meetings and the maintenance iteration cycle was provided in the DSAC Papers and was taken as read.

Issues Raised by Members

The Chair noted that no issues were raised by members for discussion at this month's meeting.

Treasury Update

Kate O'Rourke, First Assistant Secretary CDR Division, Treasury (TSY) provided an update as follows:

TSY noted that they are continuing to work through the work streams listed on the one-page snapshot of the CDR horizon circulated with the minutes from the last meeting and thanked everyone for their contributions so far. This work includes:

- Consultation on extending the CDR to telecommunications based on the TSY/DSB Design Paper. The closing date for submissions is 29 March 2022.
- Determining the Sectoral Assessment approach for open finance, noting the sector includes non-bank lending, merchant acquiring services and particular data sets in superannuation and insurance.
- In relation to the CDR Rules, work has continued on issues that remain open after version 3 of the CDR Rules, such as the business data and reciprocity questions, and on more general Rules maintenance issues.

TSY noted the upcoming Federal election and described the caretaker conventions that apply once parliament has been dissolved. TSY noted the last date by which there may be an election is the 21 May. During the caretaker period, the Government and the public service only undertake business as usual administration of existing programs rather than taking any new policy decisions or advance policy proposals that an incoming government may not support. TSY noted that the caretaker period may begin as early as a couple of days after the Federal Budget, which is on the 29 March, and will last until the next government is formed.

In relation to the CDR, the existing administration of the program will continue, but there will be a pause in relation to new policy proposals during the caretaker period.

The Chair noted that there are some uncertainties in the timing which may well have some impact on both the amount of content and the scheduling of some of the DSAC meetings.

One member asked if there's a change of government does caretaker extend for that transition of power?

TSY noted that caretaker ends when the next government is formed.

One member noted in regard to the Design Paper on Telecommunications, are there plans to have a consumer group forum similar to what was done for the version 3 Rules amendments?

TSY noted they don't have the particular arrangements for this at hand and they will come back to the committee on this piece.

ACTION: TSY to provide an update on the arrangements for the forum around the Design Paper on Telecommunications

One member noted that there will always be a new government that gets voted in and even if the Liberal Party of Australia is re-elected, there could be a change in portfolios which could result in disruption over the coming months.

The Chair asked TSY if there is a re-evaluation of portfolios, would there be any reason why activities for things like the development of decision proposals or responding to feedback from the Design Paper on Telecommunications couldn't recommence and would have to wait for the new portfolio minister to be appointed and give their approval?

TSY noted that a lot of work happens for briefing an incoming government, including information about work that will assist with the maintenance of existing programs. TSY noted the briefing is dependent on the particular ministerial arrangements and the party. TSY said if there is a new Minister, part of the responsibility of the department that supports that minister is to give them a quick update of what's immediate and what things might need to be progressed etc.

The Chair noted that it appears the specific circumstances will need to be assessed as they can't be predicted, but there could be substantial pausing of progress on things like telco standards etc.

TSY noted that they've heard the importance of the momentum that's been built and the value of additional data sets being included in the CDR.

TSY noted that on the communications campaign, that it was progressing work to enhance CDR branding and marketing advice including exploring the potential to incentivise the use of the CDR logo for Accredited Data Recipients (**ADRs**) and associate with trust and confidence. A broader, more public campaign would likely be pursued at a later stage.

One member asked TSY if they had done benchmark research on what the current levels of awareness and understanding is and where the gaps might be?

TSY noted some research has already been completed which has informed the Government's approach to date, including the approach of targeting business awareness and participation to grow the ecosystem to support future retail-level consumer engagement.

The Chair noted that our next meeting is scheduled for 13 April and if the caretaker period is underway, we may have a meeting to discuss the maintenance iteration findings, or we might send around a status update to DSAC members or have a shorter meeting for perhaps 30 mins. As the 18 May meeting is in the centre of the election/caretaker period and given that Frolo have offered to host the meeting, we may move this face-to-face meeting to June. As soon as the Federal Election announcements have been made, the DSB will communicate any changes to the upcoming meetings.

CDR Statutory Review Update

The Chair noted that he is delighted that Elizabeth Kelly (EK) has not only accepted the challenge of doing the Strategic Review but also in joining us at the meeting today. He invited EK to provide an outline of how she's approaching the review and any particular issues.

EK thanked the DSB for the opportunity to connect with so many of the key players. EK noted that she retired last year as an APS after 31 years mostly in Government, some private sector and most recently working on the Digital and Innovation Policy at the Department of Industry, Innovation and Science (DIIS). EK mentioned she had also worked on the digital economy and the various government strategies around digital economy.

EK noted that she has followed the CDR from the outset and data portability is an absolute key issue for the growth of the digital economy. EK accepted this review because she wanted to know whether this reform is working and/or whether it will work in the future.

EK noted that the CDR was originally envisaged to create consumer benefit by increasing productivity in designated sectors. Noting the evolution of both the CDR regime and the economy, it is an appropriate time to confirm whether the original CDR objectives continue to serve the needs of the contemporary economy.

As part of the Review, EK is considering the assessment, designation, rule-making and standards setting. These have been set up on a sector-by-sector basis, and there is an open question on whether the economy operates that way, and whether consumers consider use cases in that way. EK noted potential challenges for the CDR to achieve consumer-orientated outcomes and reflect the way consumers access the economy and look at products and services while still operating on a sector-by-sector basis.

EK noted that she will be looking at the architecture of the original statutory regime to see whether the vehicle we have created is a Rolls Royce. She noted the high level and density of the technical

detail in CDR. She has been reflecting on whether the CDR needs so much detail and whether a principles approach may mean we don't need that level of prescription and whether it would open up greater possibilities for a cross-sectoral approach.

The future direction of the CDR is also part of the Review, and EK noted the expectations on the CDR, which could include action initiation and also including government data in the system.

EK said she will also be looking at whether the regime is enhancing the products and services that are available to consumers and is interested in hearing from stakeholders on this.

EK noted that her review is thinking big picture about the scheme, where we want it to go and whether it's well placed to do it. She will be engaging in bi-lateral consultations and hopes to have a discussion paper out within the next week.

One member noted they're in favour of the big picture approach and minimising prescription and taking stock of where we are at and where we're going. They noted it might be a great aim to make it more flexible and the roll out faster but sometimes in doing that, it actually makes it slower and more confusing and there may be more fundamental changes that each sector has to make to become more like the others.

EK noted that we certainly don't want to endanger consumer confidence in the system but the CDR is at an early stage and can be influenced to a certain extent. EK noted consumer confidence is vital and nothing that we do should endanger that, and that consumers will also benefit enormously from broader, greater productivity in the affected sectors and a greater variety of products and services.

One member noted that they're a big fan of the principles approach and think this could accelerate the work. They suggested the foundational work has been done and it is being looked at globally. They noted that the Philippines Central Bank has done an interesting cross-country comparison of the different open banking approaches and there are three flavours emerging which are prescriptive (the road we have taken), emergent (like Japan) and hybrid. They think we will end up in some happy place in between.

Another member noted from their perspective, the approach has been too prescriptive and resulted in compliance costs in the billions. They expressed concern about tier 2 and 3 financial institutions, who are so far from meeting their obligations in terms of a DH are never going to get to ADRs in the near term. They said they subscribe to the principles of why we want to do this, but maybe we've been far too prescriptive in version 1.

EK noted the misconception that prescription gives you certainty. EK noted that principles, and a thorough understanding of principles, can be effective in creating certainty as long as they are properly implemented.

One member noted that they are very interested in where the review lands in terms of success metrics and what does that look like from a consumer perspective and also auditing and enforcement and the pathway for consumers to seek support if breaches occur.

EK noted that it is very early days and there have been very few properly conceived complaints to see how the current dispute resolution framework works. EK said consumer confidence is vital and the compliance system will underpin consumer confidence.

One member noted that if we look at data sharing outside of CDR and we try and improve on that, that's progress and a change that benefits consumers. They said any positive change is good and will bring benefits to consumers, the economy and society and maybe that's a principle that we don't

have to do everything day one. They also queried how feedback through the review would flow through to impacts on the ecosystem.

EK noted that her focus is to put the best policy position to the government. EK noted that she needs to make sure the framework isn't stretched by trying to make it do a whole lot of things that it wasn't originally designed to do and you also need to understand that every change you make has huge compliance costs and industry just wants to get on with it.

EK noted that there is an interest in what we need to do to make the CDR a driver for the future and whether changes are required. EK noted that Australia's productivity is flat and CDR is a microeconomic reform of our age with huge interest in its potential to drive productivity. The review provides the opportunity to chart our way forward and provide a direction for the next few years.

One member suggested three types of prescription existed i). technical prescription about the authentication and sharing mechanisms and observed that that is where the majority of incidents happen today in terms of DH and ADR interpretation. They said there is a need for very strong prescription in that initial technical protocol, but they have struggled with two other areas of prescription; ii). the coverage across all products, channels and customers where you move from the 80/20 rule of a retail customer and what they see in digital banking to legacy systems that are offline. They noted legislation gives an obligation to start replumbing the whole bank which is part of the huge costs versus giving consumers the majority of what they need; and iii). the third type is about how it co-exists with complementary data sharing capabilities which already serve part of the purpose.

The same member noted that the majority of business customers who want data into their accounting systems, have it already plumbed in. They noted that since 1 November they haven't had a single business customer share through CDR because all the business customers who already wanted that data have access to it. They said in terms of the corporate and institutional space, as they go through segments and whether they share through swift or otherwise, there's a bit of a challenge reconciling the complete scope of the legislation, which is a core part of banking product compliance, versus how far do you go to make it useful for competition.

EK noted that the question of whether everyone should be channelled into CDR is a really significant question especially when we know that in all but large organisations, compliance is going to be very demanding.

The Chair thanked Elizabeth Kelly for attending the meeting today and extended an open invite to come back to any future meetings.

ACCC Update

Paul Franklin, Executive General Manager ACCC CDR Division provided an update as follows:

ACCC noted that they had just attended a meeting of the ACCC this morning where the ACCC agreed to expand the data available on the CDR dashboard.

ACCC noted that since the last meeting they have accredited Suncorp (2 Mar) as an ADR and activated National Australia Bank (16 Feb) and Beyond Bank (25 Feb) which takes them to a total of 5 new ADRs activated in February. In total, ACCC said they have 16 active and 29 ADRs which is a significant uptick. They also activated 3 new DH brands, ANZ Plus (28 Feb), Community First Credit

Unions Amigo Credit Card (28 Feb) and Citibank's PayPal Rewards Card (1 Mar) which takes them to 106 active brands.

ACCC noted that they don't expect the work they're doing to prepare and test for the implementation of energy will be affected by the caretaker provisions.

ACCC noted that they have approached the Australian Energy Market Operator (AEMO) with an offer to coordinate testing, including to support multi-lateral testing with AEMO and participants in the sandbox they're about to release in the next couple of months. ACCC said they will continue to work with AEMO to make sure that there's an end-to-end approach to multi-lateral testing.

One member noted that they been looking hard at logging issues that they are seeing. They are currently limited to 2 JIRA licenses per ADR which is a problem in a larger organisation. Is this something that can be changed and increased?

ACCC noted that this sounds like an easy fix, and they will come back to the member in regard to this.

ACTION: ACCC to access the possibility to increase the number of JIRA licenses available to organisations

Decision Proposal 240

The Chair noted that this item is in context of the performance of the regime, conformance performance and data quality and previous consultation work and responds to the discussion at the last DSAC. It also relates to ACCC's feedback that they can't consider data that they don't have.

The Chair noted that the DSBs process is to develop in the light of issues, a decision proposal that would then be consulted on publicly, and given the DSAC's previous input, the Chair thought it would be a good opportunity to provide to the members prior to publishing.

The DSB noted that Decision Proposal came from the discussion around data quality and the issues that potentially ADRs were seeing but the ACCC could not, as the ACCC can't access customer data. Also the metrics from DH aren't reporting these things.

The DSB noted that they are proposing to start the process of fixing the data quality issue through observability to better understand what the data quality experiences for ADRs. There's already a lot of requirements for ADRs, and they don't want to create a higher hurdle for them so they've tried to accommodate in responding to this in how do they make this possible so ACCC gets the data and can potentially resolve it without necessarily creating a tax on all ADRs.

The DSB noted that this decision proposal is asking questions rather than being prescriptive about the solution, and as a starting point, it gives a specific recommendation as a straw man and is highlighting the issues.

The DSB noted in terms of optionality, that there are no non-functional requirements and effectively the ADRs are reporting on the behaviour of DHs. The DSB said there is a question around whether they make this metric API optional, but if they did mandate it in the future, maybe they do it for certain classifications of ADRs (e.g. intermediaries that are supporting many sponsored or representative solutions). The DSB noted that if they get enough data without making it mandatory then this would probably be better.

The DSB noted that the other thing they can consider is that they don't need an API and do it as manual reporting. However, the DSB has discussed this previously and the manual effort required to raise an issue is a problem so automating is a good thing. The DSB said that is why they've not gone down this path as an initial recommendation.

The DSB noted that because of implementation costs, they may want to phase it by saying here is an API people could implement, and ACCC can start calling when everybody's built that in the meantime, participants could report this manually using this structure.

The DSB noted that the current recommendation says that they'll define an API, it will not be mandated so it will be a "may" in the standards. The DSB said it'll be along the lines of the DH API from a security perspective because that's established, but it'll be to the ADRs instead. The DSB said the data to be included in that is per DH brand ID with average response times per end point so they can understand if there's a particular set of data clusters or APIs that are problematic, the number of invocations, rejections and errors etc. The DSB said they have also tried to accommodate latency and included the drop-off rates so there's a mechanism in there to port the consent authorisation flow with particular accounts.

One member noted that some DHs have spent billions and going back to the root cause of the problem you can't get production validation test (PVT) for free which is what it is now. They understand you can make it less manual but it is not going to the root of the problem which is DH aren't sending conformant payloads. Performance doesn't matter compared to the integrity and quality of the data if it's wrong. We need to put the onus back onto the DHs because it's their obligation to share data and there's no point in sharing it if it's incorrect. It needs to be mandated.

One member noted that they are both a DH and ADR and they're supportive of the decision proposal because they can manipulate that data much easier.

The DSB noted that on non-conformant response payloads, they included a metric for how many of the response payloads were unreadable because they weren't conformant and how many were readable but the data was not of a sufficient quality to meet the standards or to be useful. Following feedback from the ACCC team of what would help them in the compliance and enforcement area, they have tried to have it not just as a binary but have it in the API as per endpoint with the goal of that they know everybody is having a problem but it's only with a particular API, it's a better conversation to have.

Another member noted that there is a certain amount of ADRs carrying the load for assessing DH performance and that they don't disagree with anything in the paper, but it's pushing the burden of collating the information and building systems to report on it to ADRs rather than DHs. They noted that David O'Neill from APImetrics has a platform that does this. They noted it could be some time before we had enough ADRs voluntarily building enough capability to provide an equivalent service when there's already a solution used in another market. They would like to see the DSB look at this again and see if the DSB can build something to do this, rather than push that responsibility onto the ADRs.

DSB noted that they are responding from a Data Standards perspective and utilising API metrics would be more of an operational thing and not something the DSB could respond to. However, they are on the record as being an advocate to that approach.

The DSB noted that it is a problematic question for Australia in that there is no such thing as a ubiquitous test bank accounts representing different scenarios that exist in the banking sector. The

DSB said if they are going to go down that approach, they need to have a conversation around how they ask a retailer to provide a test/non-consumer account in production environments that can be used and are representative and not arbitrary as they are in non-production system.

The ACCC noted that the challenge of accessing data across the banking sector is a really significant one. They recall testing systems in banks where once you've created test data, you actually normalise out all of the variation that you need for a genuine representation of the real experience. They are very open to whether there's a different role that the ACCC can play in getting to the bottom of specific issues.

ACCC noted that in the standards for CDR, they've got to reflect a whole lot of legacy history of account types which is really complex and the CDR does not require them to standardise the information they currently have in the legacy systems. They noted that they need data that is useful to consumers.

The Chair noted that the data also needs to be representative of the real situation and not a modified or no edge case scenario. This paper is an attempt to progress this and also recognise that we have previously consulted on this and it didn't proceed. He thanked ACCC for the offer to look at all the options.

One member noted that 80% of their customers are compliant from day one because there on the core systems and you've got these edge cases of 20% which are sitting on legacy systems which is where the cost comes to bear.

The DSB noted that the proposal is within the bounds of what they can do now in the short term and as it was raised as an issue – it's a step but not a solution.

Meeting Schedule

The Chair advised that the next meeting will be held remotely on Wednesday 13 April 2022 from 10am to 12pm. Any changes to the meeting due to the upcoming Federal Election will be communicated in due course.

Other Business

The Chair acknowledged that Commissioner Peter Crone joined the meeting late. Commissioner Crone noted that he is certainly aware of the issues around data quality and appreciates there's still a few hiccups that need to be worked through. Crone noted that there has been some pretty good momentum recently and they've started to get more ADRs into the system following the recent rule changes.

Closing and Next Steps

The Chair thanked the DSAC Members and Observers for attending the meeting.

The Chair thanked Secretary Elizabeth Kelly for providing an update on the CDR Statutory Review.

Meeting closed at 11:56