| **Feedback** |
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| **1.**Firstly thank you for sending us the Document in its current format. (Email attached)[REDACTED COMMERCIALLY SENSITIVE]When reviewing Lot 4 we did notice that there seemed to be an error in the paragraphs and section for review. The document states Paragraph 2 section A, when in fact I believe it should be Paragraph 3 and section B. –As mentioned we look forward to receiving the RFP document in due course and supporting you through the process,Please see updated Terms when published - CCS believe it has resolved any issues with merit |
| **2.**Can I comment on the Technical specification document and further feedback. There are some elements which the group have feedback on initially but the status has not changed so please take this as a further request to consider.2.31  2.32 The Supplier shall support day 0 (intraday) settlement, where day 0 is the date payment is taken before the agreed end of day.The spec states this as Mandatory – need to clarify if this is transaction day. Intraday is complicated and not necessary for most within the framework. I suggest next day settlement as the option here. 2.47 Specifically Supplier must provide easy to reconcile simple blended pricing and Interchange ++ pricing either of which may be chosen by the Contracting Authority and should state which other pricing mechanisms are available.2.48 Blended pricing is fixed for the duration of the contractual term.Request to reconsider blended pricing as an option. Acquirers are being subjected to constant scheme fee changes and to put a framework blended rate and as to hold for the term of the contact is unsuitable for acquirer. Also if reductions in interchange and Scheme fees then framework merchant may not benefit. 8.2 8.3 The Supplier shall provide the business continuity and disaster recovery plan to the Authority as part of the initial assessment process and this will be reviewed between the Supplier and the Authority. on a yearly basisWe and other main acquirers do not provide Business continuity and DR plans. We do have BC and DR plans and will confirm. Please do not write into any contractual call offs. This has caused some issue with recent call off contracts. Framework schedule – Framework, not Requirements 3.4.2 The Supplier shall ensure that all Buyers, including End Users, are able to contact the Supplier directly, from any country and at any time.3.4.3 The Supplier shall provide all Buyers and End Users with a free of charge Customer Service Helpline (telephone service), which shall be available 24 hours a day, 7 days a week and 365 days a year (366 days for leap years). It is not possible to be contacted on this basis. Please can you remove as mandatory requirement or set a more appropriate timing. Please see updated Terms when published - CCS believe it has resolved any issues with merit  |
| **3.**Thanks for the updated documentation. We remain interested in being a supplier for the smaller departments in Lot 6 and would like to question the reasoning behind the depth of mandatory requirements. The latest additions seem to have merged the lots to such an extent that there is little difference between 1, 2 and 6, while it is our experience of dealing with smaller public sector organisations that many of these mandatory items should be optional.We believe very few of these low level features will be needed for departments looking for an aggregator and CCS will be prohibiting departments from having us as a best fit supplier when our experience and track record shows that similarly sized organisations see real value from a simpler approach to card payments alongside an extensive range of over-the-counter and Direct Debit options.Our dealings with public sector organisations show the following items to be optional rather than mandatory:• Foreign currencies • Intra-day settling – • A need for range of MIDs – • Differing settlement options • Dual message transactions • A chargeback management portal • An online onboarding portal • Interchange ++ pricing schedules • Amex and Diners Club/Discover schemes – • Multiple Payment Gateways • Opt in / opt out 3DS per transactions • Real time notices of declined transactions • Being ready to accept payments for new organisations within 24 hours • Wallet options • Cardholder present equipment • Detokenised card data • Real time callback responses via URL • Address verification checks • Testing sandbox –• 24/7 support • Online transaction data portal • Online portal for invoices Please see updated Terms when published - CCS believe it has resolved any issues with merit  |
| **4.**Feedback on technical spec2.48 Blended pricing is fixed for the duration of the contractual term. Nobody can agree to this \*\*\*\*If the acquirers margin is pence say 5p as part of a blend or 0.01% then a significant scheme or interchange change during a four year contract that occurs in year 2 or 3 could put them in a loss making situationIf it goes the other way then you would expect a price reduction ? rather than acquirer profiteeringMerchant acquirers should pass on costs and savings whilst retaining their marginMargins and pricing should be reviewed but I do agree with getting rid of the tiered pricing in RM 3702 if this was the objectiveLikewise if a merchants profile changes from 20 transactions a year moves to 2 million and ATV changes at the same time from £1 to £1000 this would break the blend too and cause sever imbalanceThe wording could be , the suppliers margin to remain fixed during the term of the contract otherwise interchange ++ customers taken out on the same day could a year later be paying very different prices to the acquirer margin3.9 Not all UK gateways support DD’s , this should be optional it’s a banking solution 3.22 Not all gateways have access to BINS they rely on acquirers this can cause conflict on BIN tables if supplied by different acquirer and gateway so needs to be optional and dependant on the actual service provided 3.74 Some Contracting Authorities outsource refunds and chargebacks to other entities especially if it’s a shared services and therefore they provide this to them as a managed service. Without accounting for this the few large authorities who do this will need to bring back in house which could be costly or have timed contracts or penalties We also have been asked to extend our PCI service to existing framework customers which helps them obtain compliance for level 4 customers. Like all QSA services this carries a monthly or annual fee. This needs to be either out of scope or part of the framework – Framework, not Requirements specPlease see updated Terms when published - CCS believe it has resolved any issues with merit  |
| **5.****DRAFT Technical Requirements RM6118 Payment Acceptance ServicesSection A**1. 2.48 - Blended pricing is fixed for the duration of the contractual term - I would like to again challenge the rational for this mandatory requirement. Interchange and scheme fees make up the majority of the blended fee that will be charged to the contracting authority by the supplier. The level of the interchange fee and scheme fee is dictated by the regulator or the scheme, not the card acquirer. Therefore the supplier needs the ability to pass through any increases, or decreases, to either of these fees. 2.49 allows for the supplier to amend interchange fees and scheme fees for IC++ pricing. This necessary flexibility should be extended to cover blended pricing. – 2. 2.32 - The Supplier shall support day 0 (intraday) settlement, where day 0 is the date payment is taken before the agreed end of day. – This is technically extremely difficult for a card acquirer to support. A card acquirer will not know the settlement value intraday if the contracting authority does not submit a settlement file until late evening or the early hours of the following day. Making this a mandatory requirement will limit suppliers ability to participate. I would strongly recommend this requirement is made optional. **Framework Schedule 1 (Specification) – Framework, Section 3**3. 3.4.2 - The Supplier shall provide all Buyers and End Users with a free of charge Customer Service Helpline (telephone service), which shall be available 24 hours a day, 7 days a week and 365 days a year (366 days for leap years). – Please confirm the definition of ‘End User’. Can this 24/7 365 requirement be made Optional as this is not a requirement for the vast majority of merchants. We recommend replacing with a requirement to confirm support levels in this area for suppliers that can’t meet the 24/7 365 requirement4. 3.8.2 - If separate from the Customer Service Helpline, the Supplier shall implement an Emergency Helpline (telephone facility) for Buyers, including End Users, free of charge, which must be available 24 hours a day, 7 days a week, and 365 days a year (366 days for leap years). The Supplier’s proposed facility shall, as a minimum standard, provide Buyers with the ability to report the following - Can this 24/7 365 requirement be made Optional as this is not a requirement for the vast majority of merchants. We recommend replacing with a requirement to confirm support levels in this area for suppliers that can’t meet the 24/7 365 requirementPlease see updated Terms when published - CCS believe it has resolved any issues with merit  |
| **6.**Thanks for the opportunity to provide feedback on draft framework, that’s really appreciated and enables everyone to be part of the process.Thanks for moving PISP to separate a lot as this would provide lot more clarity and enables new players providing to apply for it.**Feedback****Section 3.9 –**3.1.1.iDeal3.1.2.Sofort3.1.3.Klarna3.1.4.TrustlyAll of these methods fall into Open Banking / PSD2 category and provides same payment initiation options as other UK based TPPs like us would do. So, these should not be called out in the agreement to not have new PISP providers to be at disadvantaged.**Section 6.4**PISPs could combine other set of APIs e.g. Direct Debit, Faster Payments, so should be allowed to provide extended APIs and services. **Section 6.11**This puts PISP at disadvantage as they would be competing with large payment gateways which may not be yet ready to adopt payment initiation due to conflict revenue streams. So this should not be mandatory or should be other way around – “Supplier should provide solution to integrate with payment gateways selected by Contracting Authorities if there is no direct connection.” Please see updated Terms when published - CCS believe it has resolved any issues with merit  |
| **7.****CCS Specification Feedback****Framework Schedule Section 3 - LOTS 1, 2, 3, 4, 5 & 6 – UNIVERSAL MANDATORY DELIVERABLES - Framework** 3.4 - Can you please confirm the definition of End Users? It is typical for Payment Service Providers to provide support to the Buyers and their employees/partners that use the service, but not first line support to the end customer who is attempting to make the payment.3.7.3 - Typically the implementation of a payment service is done by the Buyer, not the Supplier, as requires technical development with the Buyer’s systems. As such we do not believe that The Supplier should be required to manage this process as a mandatory requirement, and would suggest this should be an optional service. 3.7.4 / 3.7.5 - Creating an Implementation and detailed project management plan in this detail is not appropriate for most users, and the implementation is typically owned by the Buyer. As such we believe this should be an optional service, with a lighter version being mandatory where the Supplier is of course required to provide support for testing of the system and guidance during the implementation3.9.2 - This (Accounts Receivables Analysis) is a costly piece of work that is not economical to provide to all users of the Framework. We believe this should be optional, or at least tiered.3.12.1 - It is not reasonable for the Supplier to provide electronic invoicing to the CAs chosen format as this could require manual invoices being created for each one of the hundreds of thousands of public sector entities. Payment providers are designed to operate at scale and as such cannot customise invoices on a user by user basis. We believe the mandatory requirement should be to provide electronic invoicing, with the rest optional.**Framework Schedule Sections 4-10 Specifications****Section A - Merchant Card Acquiring Services**2.32 - Requirement for T+0 settlement - this should be optional given card scheme settlement to the PSP is often not until subsequent day, and can vary by card brand, meaning it cannot always be supported. In addition, this speed of settlement is not needed for majority of UK Public Sector where cash flow is not a key concern. Hence it should not be a mandatory requirement to enter into the framework, but an optional capability agreed as part of commercial terms. 2.35 - Many organisations (especially smaller organisations) prefer having a single settlement containing charges and refunds netted off. As such we believe this should be an optional requirement, with offering netted off settlement of charges and refunds also a valid option. 2.52 - It is not cost effective to give each individual CA an audit right. The provider should have annual financial audits which confirm it charges its fees correctly. Please see updated Terms when published - CCS believe it has resolved any issues with merit **Section B - Payment Gateway and Alternative Payment Method (APM) Services**3.7 - We believe the mandatory/optional division should be the same as in Section A with at the least Diners Club/Discover being optional as there is a very low penetration in the UK. This comment also applies to 4.4.4 in Merchant Acquiring Equipment -3.9.2 - The requirement for PayPal should be optional as the majority of users of this Framework are looking for card processing services and do not use PayPal. As such it should not be a hard requirement to support. It is typical to maintain a separate direct integration to PayPal if needed. 3.27 - Can you confirm that this means that the Payment Gateway will only need to connect to the list of supported Merchant Acquirers listed in Section A 3.4? If the CA has a Merchant acquirer not listed in the Payment Gateway’s supported set then they should choose another Payment Gateway. It is not commercially reasonable for the Payment Gateway to connect to any Acquirer the CA chooses. - Yes3.64 - There is often a cost to provide 3D-Secure services and as such it should be a chargeable service so as to prevent the cost also being spread to merchants that do not use it. Some Suppliers may of course choose to provide for free APM Settlement - Suppliers should only need to support (as a minimum) one APM model - either direct APM settlement or collect model. By forcing every Supplier to offer both you miss out on best in class providers that offer a single model. The CA can then select the Supplier that best meets their requirement from the lot. 3.86 - Gross settlement should be an optional requirement as APM settlement should be able to be offered either gross or net of fees. Both are options in the market with merchants with many merchants preferring Net and different Suppliers offering different models. Hence only including one precludes a set of suppliers and misses the needs of merchants wanting net settlement. – 3.86 - Settlement timings should be agreed commercially per APM, and cannot always be day 1 or day 2. If offering the Collect Model the settlement time between the APM and payment provider may vary meaning day 1 settlement is not always possible as there might be a delay in the payment provider receiving the funds. 3.88 - Per previous comments this should be optional, as per comment 2.35Please see updated Terms when published - CCS believe it has resolved any issues with merit**Section D - Fraud Avoidance**5.3 - This should be optional as this type of high touch support is not cost effective to provide to all public sector entities –  5.8 - We believe the requirement for the fraud tool to work with non card payment methods should be optional. This is because the majority of Contracting Entities use gateway and acquiring services primarily for card payments, so this is a piece of functionality that will not be used in a large share of implementations, and as such should not be a mandatory to participate. Please see updated Terms when published - CCS believe it has resolved any issues with merit**Section F - Aggregator**General - we believe it should be a mandatory requirement for onboarding to happen through an online system. 7.10 - Aggregator should be able to provide either gross or net settlement as an option. In the market most smaller users prefer net settlement in order to simplify reconciliation. In addition it enables more cost effective service as reduces collection costs. 7.11 - t+1 settlement should be optional and not required to offer at scale through aggregated services as standard Please see updated Terms when published - CCS believe it has resolved any issues with merit |