

Payment Systems Regulator

Questionnaire on Access to Interbank Payment Systems

July 2014

1. Introduction

This document presents:

- a description of the questionnaire structure;
- the questions that will be asked in the online questionnaire; and
- a list of abbreviations used in the questionnaire.

This document is intended for reference purposes only and is aimed at assisting with the completion of the online questionnaire.

2. Questionnaire Structure

The questionnaire is divided into four steps:

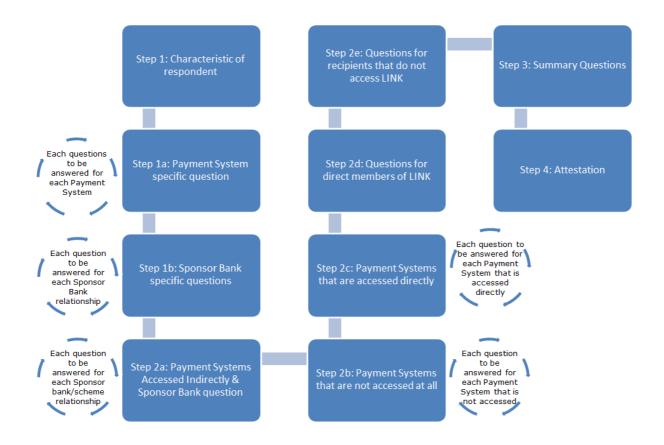
- Step 1
 - Characteristics of your organisation understanding your use of interbank payment systems
 - Step 1a understanding your experiences with each applicable payment system
 - Step 1b understanding your experiences with your sponsor bank(s)
- Step 2
 - Step 2a questions focused on payment systems that your organisation access indirectly
 - Step 2b questions in relation to payment systems that the your organisation does not access (either directly or indirectly)
 - Step 2c questions in relation to the payment systems that your organisation accesses *directly*
 - $_{\odot}$ Step 2d questions in relation to recipients that have direct membership with LINK
 - $\circ~$ Step 2e questions in relation to recipients that do not have direct membership with LINK
- Step 3 Summary questions
- Step 4 Submission /Attestation

Within the questionnaire, there are a number of questions that may be repeated depending on your sponsor bank and payment system relationships:

- Step 1a should be answered for every payment system you access (either directly or indirectly)
- Step 1b should be answered for every sponsor bank relationship you hold
- Step 2a should be answered for each payment system accessed through each sponsor bank

- Step 2b should be answered for every payment system you do not access
- Step 2c should be answered for every payment system you access directly

The figure below sets out the structure of the questionnaire diagrammatically.



Illustrative example

Consider the illustrative example of a fictional payment service provider known as 'Acme Payments Ltd':

- Acme Payments Ltd is a member of the BACS payment system.
- Acme Payments Ltd accesses CHAPS, C&CCC, and Faster Payments indirectly through sponsor arrangements.
- Acme Payments Ltd accesses CHAPS and Faster Payments indirectly via a sponsor arrangement with HSBC.
- Acme Payments Ltd accesses C&CCC indirectly through sponsor arrangements with both HSBC and RBS.
- Acme Payments Ltd is not a member of LINK.

Acme Payments Ltd would complete the questionnaire as follows:

• **Step 1** would be completed as follows:

Please define access each		If not a direct member, please indicate whether you use a sponsor bank for indirect access					er you
Schemes	Direct Member?	Barclays	Co- Operative Bank	Lloyds Banking Group	HSBC	RBS	Other
Bacs	Yes	No	No	No	No	No	No
CHAPS	No	No	No	No	Yes	No	No
C&CCC	No	No	No	No	Yes	Yes	No
Faster Payments Service	No	No	No	No	Yes	No	No
LINK	No		I	1	· · · · ·		<u>.</u>

- **Step 1a** would be completed four times (for Bacs, CHAPS, C&CCC and Faster Payment).
- **Step 1b** would be completed two times (for HSBC and RBS).
- **Step 2a** would be completed four times (for CHAPS/HSBC, C&CCC/HSBC, C&CCC/RBS, Faster Payments/HSBC).
- Step 2b would be completed once (for LINK).
- **Step 2c** would be completed once (for Bacs).
- Step 2d would not be completed (as Acme Payments is not a member of Link).
- Step 2e would be completed.
- **Step 3** would be completed.
- **Step 4** would be completed.

3. Questionnaire Questions

This section presents the questions contained in the questionnaire, along with the type of input required (e.g. free text response, numeric response). For completeness, transition pages (e.g. introduction, questionnaire completion) that will be part of the online questionnaire are also presented.

The questions are presented for reference purposes only – the questionnaire should be completed online using the link provided.

Introduction/Landing Page:



Welcome to the Payment Systems Regulator's (PSR) questionnaire on access to interbank payment systems.

This is an opportunity to share your experience and concerns to help shape the PSR's regulatory approach for access to these systems.

All information submitted will be treated as commercially confidential. Please note that we intend to aggregate and anonymise information and do not intend to attribute specific information or comments to named organisations. All responses will be treated as anonymous and will be used to help identify common themes and trends across the industry. The PSR may follow up with individual organisations if further information or particulars are required.

The questionnaire can be saved when it is partially complete to be completed at a later date. Once you have submitted your answers, the link may not be used again.

Thank You

For technical questions please contact: arun.vohra@accenture.com.

For general questions please contact: paymentsystems@fca.org.uk.

Step 1 – Characteristics of your Organisation

The following questions are aimed at understanding your organisation and your use of interbank payment systems

1.1 Authorised Payment Institution Small Payment Institution EEA Authorised Payment Institution What type of institution would best describe your organisation? Credit Institution – Bank Credit Institution – Mutual/Building Society Credit Union Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button		Questions	Possible Answers
What type of institution would best describe your organisation?EEA Authorised Payment Institution Credit Institution – Bank Credit Institution – Mutual/Building Society Credit Union Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button	1.1		Authorised Payment Institution
What type of institution would best describe your organisation?Credit Institution – Bank Credit Institution – Mutual/Building Society Credit Union Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button			Small Payment Institution
What type of institution would best describe your organisation?Credit Institution – Mutual/Building Society Credit Union Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button			EEA Authorised Payment Institution
organisation? Credit Institution – Mutual/Building Society Credit Union Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button			Credit Institution – Bank
Authorised Electronic Money (e-Money) Institution Independent ATM Operator Other - please specify in free text field below Radio Button			Credit Institution – Mutual/Building Society
Independent ATM Operator Other - please specify in free text field below Radio Button			Credit Union
Other - please specify in free text field below Radio Button			Authorised Electronic Money (e-Money) Institution
Radio Button			Independent ATM Operator
Radio Button			Other - please specify in free text field below
Free text field		Free text field	

1.2	its own acticated sort code:	Yes No <mark>Radio Button</mark>	
1.3	Please use the free text field below to provide your views on any concerns (if applicable) on the process of obtaining a sort code		
	Free text field		

1.4 Please define how you

access each payment system

If your organisation is not a direct member, please indicate whether you use a sponsor bank to obtain indirect access

			Ca	ماريمار			
Payment System	Direct		Co- Operative	Lloyds Banking			
	Member?	Barclays	Bank	Group	HSBC	RBS	Other
Bacs	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Dacs	No	No	No	No	No	No	No
CHAPS	Yes	Yes	Yes	Yes	Yes	Yes	Yes
CHAPS	No	No	No	No	No	No	No
C&CCC	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Calle	No	No	No	No	No	No	No
Faster Payments Service	Yes	Yes	Yes	Yes	Yes	Yes	Yes
	No	No	No	No	No	No	No
Link	Yes		<u> </u>		<u> </u>		<u> </u>
LIIK	No						

1.5 What was value of your payment transactions in 2013 (in £m to one decimal place) (please complete table below):

	Bacs	CHAPS	C&CCC	FPS	Link
Out (£m)					
In (£m)					



1.6	What was the volume of your payment transactions in 2013 (in millions to one decimal place) (complete table below):					cimal place) (please
		Bacs	CHAPS	C&CCC	FPS	Link
	Out (m)					
	In (m)					

1.7 What approximate percentage of your payments involves a party (sender or receiver) that is located outside of the UK?

	CHAPS
	0-20%
Percentage of	21-40%
payments involving a	41-60%
party located outside of the	61-80%
UK	81-100%
	Drop Down



1.8	Do you expect the volume and value of transactions to change materially over the coming years? (e.g. through joining another payment system)
	Free text field

1.9	Do you have a reserve account at the Bank of England?	Yes No Radio Button
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1.10	Please indicate which banks you use debt facility)	for non-payment related co	mmercial banking services (e.g.
		Yes	
		No	
	Barclays	Radio Button	
		Yes	
		No	
	Co-Operative	Radio Button	
		Yes	
		No	
	Lloyds Banking Group	Radio Button	
		Yes	
		No	
	HSBC	Radio Button	
		Yes	
		No	
	RBS	Radio Button	
		Yes	
		No	Text field to specify Other (100
	Other	Radio Button	characters)
		Yes	
		No	
	None	Radio Button	

1.11	What was your company revenue in the most recent financial year (£m to one decimal place)	Numeric field, preceding a `£' sign and ending with 'm' to denote £m
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Step 1a – Your experiences of [Payment System]

The following questions are aimed at understanding your relationship and interactions with [Payment System]

Category	Question Number	Questions	Possible Answer
Payment System Interaction Understand	1a.1	Have you ever attempted to become a direct member of this payment system? If so, what were the key challenges?	No, have not attempted to become a direct member of the payment system Technology requirements Collateral Bank of England Settlement Account Access Other key challenges (please specify in free text field below) As a tick box
the relationship and interactions	1a.2	Do you have to adhere to any payment system rules, requirements or obligations to secure indirect access to this payment system?	Yes (please specify in free text field below) No Radio buttons
between an indirect member and the payment	1a.3	Do you participate in any affiliates groups for this payment system?	Yes No Radio buttons
system	1a.4	Do you feel you have sufficient insight and influence into the governance and strategic direction of the payment system?	Yes No Radio buttons
	1a.5	Have you attempted to obtain a settlement account with the Bank	Yes – successful Yes – denied account



	of England (for this payment system - if applicable)?	No / Not Applicable
		Radio buttons
1a.6	Have you ever conducted a review of the likely costs associated	Yes – please provide estimates
	with becoming a direct member of this payment system?	below
		No
		Radio buttons
1a.7	Please use the following free text field to provide any further inform	mation or comments you have on your
	interaction within this payment system	
	Free text field	
1a.8	What benefits (if any) do you believe you would achieve by becom system?	ing a direct member of this payment
	Free text field	



The following questions are aimed at understanding the governance of your relationship with your sponsor bank

Category	Question Number	Questions	Possible Answer
Governance of relationship with sponsor bank	1b.1	What type of arrangements do you have in place governing the relationship with your sponsor bank?	Formal contract, SLA in place Formal contract, no SLA in place Informal relationship, SLA in place Informal relationship, no SLA in place Other – please specify in free text field below Radio Buttons
Understand how the relationship between agency and sponsor is governed, including security of supply	1b.2	If you have a formal contract, what is the notice period within the contract with the sponsor bank?	No formal contract in place <1 month 1 - 6 months 6 - 12 months Other Radio Buttons
	1b.3	If you have a contract in place with your sponsor bank, how often is this contract reviewed?	No formal contract in place 0 - 6 months 6 months - 1 year 1 year - 2 years 2 years - 4 years 4 years + Radio Buttons

1b.4	If you have contractual arrangements with your sponsor bank, do you have one contract for all payment systems or different contracts for each payment system?	No formal contract in place One contract for all payment systems One contract for each payment system Other – please specify in free text box
1b.5	Please use the following free text field to provide any additional info governance of the relationship with your sponsor bank	Radio Button rmation or comments you have on the
	Free text field	
1b.6	If relevant, what are the key service level agreements you have in p	lace with the sponsor bank?
	Free text field	
1b.7	Do you feel you have security of supply for your indirect access?	
	Free text field	



The following questions are aimed at understanding the degree of choice in the sponsor market, drivers of supplier choice and relative bargaining power when selecting your sponsor bank

Category	Question Number	Questions	Possible Answer
Competitive dynamics	1b.8	When choosing a sponsor bank, did you feel you had sufficient choice in sponsor banks? (Please provide any comments you have on the degree of choice available for sponsor banks in the box below)	Yes No Radio Button
Understand the degree of choice in the sponsor market, drivers of	1b.9	What were the key factors you considered when choosing your current sponsor?	Cost Service Offering Wider Commercial relationship Technical compatibility and access Other (please specify in free text field below) Tick boxes



supplier choice and relative bargaining power	1b.10	If applicable, why do you obtain services from multiple sponsors for access to the same payment system?	We only use one sponsor bank for this payment system Historic Relationships (across business function) Contingency Differing propositions to meet business needs Result of M&A Other (please specify in free text field below) Tick boxes	
	1b.11	Please use the following free text field to provide any additional information or comments you have on		
		selecting a sponsor bank		
		Free text field		
	1b.12	What criteria did you need to meet in order to secure an agreement with your sponsor bank? e.g. funding of settlement account, AML, regulatory status, access to sort codes, technical criteria		
		Free text field		
			<u></u>	
	1b.13	Please detail whether you had the ability to negotiate on key terms of the agreement with your sponsor bank (e.g. on price) and the impact this had on terms of the agreement		
		Free text field		

The following questions are aimed at understanding what barriers to switching sponsor bank may exist

Category	Question Number	Questions	Possible Answer
Barriers to switching Understand what barriers to switching sponsor bank may exist	1b.14	Have you considered switching away from your current sponsor bank?	Yes No Radio Button
	1b.15	In the past, have you ever switched from another sponsor bank to this current sponsor bank?	Yes (please specify in free text field from which sponsor bank you switched from) No Radio Button
	1b.16	If you have ever considered switching or have actually switched sponsoring banks, what were the key reasons for this?	Poor quality service Fees New service offerings from different sponsor bank Technical concerns Other (please specify in free text field below) Not Applicable Tick Boxes
	1b.17	If you have switched your sponsoring bank in the past, what were the key challenges you faced in migrating to the new provider?	Never switched sponsor bank Adverse customer experience Changes in business processes Technical infrastructure changes Cost



1b.18	If you were to switch providers in the future, what would be the key challenges you would/could face?	Other (please specify in free text field below) Not Applicable Tick Boxes Not Applicable Adverse customer experience Changes in business processes Technical infrastructure changes Cost Other (please specify in free text field below) Not Applicable
		Tick Boxes
1b.19	Please use the following free text field to provide any additional information barriers to switching your sponsor bank.	mation or comments you have on the
	Free text field	



The following questions are aimed at understanding the services provided by your sponsor bank and concerns around these services

Category	Question Number	Questions	Possible Answer
Services provided by sponsor bank	1b.20	What channels do you use to submit your outbound payment instructions?	Direct technical connection to central infrastructure (e.g. Direct Corporate Access, Direct Agency) Sponsor's internet banking portal Swiftnet connection to sponsor bank Host-to-host connection with sponsor bank Other (please specify in free text field below) Tick Box
Understand the services provided by the sponsor bank and concerns around these services	1b.21	What channels do you use to receive your inbound payment instructions?	Direct technical connection to central infrastructure (e.g. Direct Corporate Access, Direct Agency) Sponsor's internet banking portal Swiftnet connection to sponsor bank Host-to-host connection with sponsor bank Other (please specify in free text field below) Tick Box
	1b.22	What channels do you use to obtain reports on your inbound and outbound payment instructions?	Direct technical connection to central infrastructure (e.g. Direct

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		Corporate Access, Direct Agency) Sponsor's internet banking portal Swiftnet connection to sponsor bank Host-to-host connection with sponsor bank Other (please specify in free text field below) Tick Box
1b.23	What drives the selection of the channel you use for submission and receipt of payment instructions and related information?	Cost Business Need Other (please specify in free text field below) Tick Box
1b.24	Please use the following free text field to provide any additional inform channels that you utilise for your payments instructionsFree text field	nation or comments you have on
1b.25	What are the key technical infrastructure requirements you have to m sponsor bank? (e.g. messaging standards, file formats, security protoFree text field	-



	1b.26	What payment processing related services does your sponsor bank provide you with?	Message validation Message repair Exceptions processing Other (please specify in free text field below) Tick Box
Services provided by sponsor bank	1b. 27	What funding requirements does your sponsoring bank require for the settlement of your payments?	Maintenance of account balance within agreed overdraft Provision of non-cash collateral Prefunding of account Other (please specify in free text field below) Tick Box
Understand the services provided by the sponsor bank and concerns around these services	1b. 28	Which of the following services (if any) are obtained from your sponsor bank in regards to network extension and customer support?	Access to Branches Counter Services Dedicated Relationship Managers Product Advice Other (please specify in free text field below) Tick Box
	1b. 29	Do you receive timely formal communications from your sponsor bank with regards to any impacts to your service proposition (e.g. system down time, change control etc.)?	Yes No Radio Button
	1b.30	Does your sponsor bank provide you with any regulatory compliance related services?	Assistance with sanction screening Assistance with AML regulation Other – please specify in the free text field below No Tick Box

1b.31	Please use the following free text field to provide any additional information or comments you have on the services you receive from your sponsor bank
	Free text field
1b.32	Please provide a description of any other payment-related services provided by your sponsor bank that have not been covered by the questions above (e.g. a managed service type proposition)
	Free text field
1b.33	Are there any limitations to the current services provided by your sponsoring bank you would like to highlight (e.g. cut-off times)?
	Free text field

The following questions are aimed at capturing any additional views and concerns you may have around your sponsor bank relationship

Category	Question Number	Questions	Possible Answer
Concerns	1b.34	How would you rate the service from your sponsor bank?	 5 - Very Satisfied 4 - Satisfied 3 - Neither satisfactory or dissatisfied 2 - Dissatisfied 1 - Very Dissatisfied Radio Button
Capture any additional views on concerns	1b.35	Do you have any concerns with this sponsor bank regarding: [Please select all that apply and provide detail in the free text box]	Quality of services received (e.g. lack of formal communication on service outages) Governance of relationship (e.g. lack of formal contracts) Cost of access (e.g. high fees) Regulatory compliance requirements (e.g. onerous AML processes) Credit and liquidity requirements (e.g. require pre- funding of settlement accounts) Technical and operational requirements (e.g. high cost of technology solutions) Other (please specify in free text box) No concerns Tick Boxes

Step 2a – Indirect access of [Payment System] through [Sponsor Bank]

Please complete and answer the following questions in relation to the pricing arrangements in accessing [Payment System] through your sponsor bank ([Sponsor Bank])

Category	Question Number	Questions
	2a.1	Not including any fixed charges, how much do you pay per transaction for the services received from the sponsor bank for accessing this payment system? Please indicate if these are volume related or contingent on other factors (e.g. different fees for inbound and outbound payments).
		Free text field
Pricing	2a.2	What are the fixed charges incurred? E.g. monthly fees
		Free text field
Understand	2a.3	If applicable, what other fees related to payments made using this payment system are paid to third- party providers that are imposed by the sponsor bank e.g. payments to middle-ware providers.
pricing		Free text field
arrangements	2a.4	Please describe any other fees or charges you need to pay to complete payments using this payment system through this sponsor.
		Free text field

Step 2a – Indirect access of [Payment System] through [Sponsor Bank]

The following questions are aimed at capturing any additional views or concerns you have on accessing [Payment System] through your Sponsor Bank ([Sponsor Bank])

Category	Question Number	Questions	
	2a.5	What additional services related to this specific payment system would you like to see from your sponsor	
		bank that are not currently available?	
Concerns		Free text field	
Contura	2a.6	Please provide any views you have on any proposed future changes to the payment system and/or	
Capture		arrangements with your sponsor banks, and the potential impact on your organisation.	
any additional		Free text field	
views or concerns	2a.7	Please provide any further comments you have on access to this payment system with regards to this sponsor bank	
		Free text field	



Step 2b – No access to [Payment System]

Please complete and answer the following questions with regards to your organisation not accessing [Payment System]

Category	Question Number	Questions	Possible Answer
Unmet	2b.1	Would you like to have access to this payment system?	Yes
demand			No De die Dutter
			Radio Button
	2b.2	If yes, have you tried to get access to this payment system in the past?	Yes
For Payment			No
system that			Radio Button
	2b.3	If yes, have you thought about or are you in the process of gaining	Yes
respondents		access to this payment system?	No
do not have			Radio Button
access to, test whether there are access issues	2b.4	If applicable, what issues have you had with securing access to this payment system?	
		Free text field	



Step 2c – Direct access to [Payment System]

Please complete and answer the following questions are aimed at understanding your experiences in obtaining direct access to [Payment System]

Category	Question Number	Questions	Possible Answer
Direct	2c.1	When did you become a direct member of this payment system?	Within the past two years Between two and five years ago Over five years ago Radio Button
Access For Payment Systems that respondents do have direct access to, to further	2c.2	Why did you decide to become a direct member of this payment system?	Increase security of supply To achieve lower costs Need to become a direct member to have access to the payment system Result of regulatory initiative (e.g. Bank of England de-tiering) Other (please specify in free text field below) Tick Box
understand their experiences in obtaining access	2c.3	Did you find the experience of getting access to a Bank of England settlement account (either directly or through a sponsor) for the purposes of this payment system to be onerous?	Yes No Radio Button
	2c.4	Please use the following free text field to provide any additional information or comments you have on obtaining direct access to the payment system	
		Free text field	

	system's central infrastructure)	s (i.e. connectivity to the payme
	Free text field	
2c.6	Would you consider becoming a sponsor bank for this payment	Yes
	system? (please provide rationale)	No
		Radio Button
	Free text field	

Step 2d – Direct access to LINK

Please complete and answer the following questions in relation to your access to LINK

Category	Question Number	Questions	Possible Answer
	2d.1	Do you use any payment systems in addition to LINK to enable connectivity to your ATM network?	MasterCard Visa No Tick Box
LINK Direct	2d.2	What are the key factors you considered in determining which payment systems to use for ATM network connectivity?	Ease of technical infrastructure requirements Costs Network coverage Other – please specify in free text field below Tick Box
	2d.3	If you have you ever considered switching away from LINK for ATM network connectivity, please state the reason why	Have never considered switching Poor quality service Fees New service offerings from different payment system Technical concerns Other (please specify in free text field below) Tick Boxes



2d.4	Please use the following free text field to provide any further information or comments on your direct
	membership of LINK
	Free text field
2d.5	Please use the following free text field to detail any concerns you may have over the settlement arrangements you have in place for LINK (e.g. if you settle via a sponsor's Bank of England settlement
	account, please highlight any concerns you have with this arrangement)
	Free text field

Step 2e – No access to LINK

Please complete and answer the following questions in relation to your organisation not accessing LINK

Category	Question Number	Questions	Possible Answer
	2e.1	Do you operate ATMs? If yes, which payment system do you use for ATM network connectivity?	MasterCard
			Visa
			No, don't operate ATMs
			Tick Box
		If yes, to previous question:	
	2e.2	What are the key factors you considered in choosing the payment system(s) you use for ATM network connectivity?	Ease of technical infrastructure requirements
No Access to LINK			Costs
			Network coverage
			Other – please specify in free text
			field below
			Tick Box
	2e.3	If you have you ever considered switching away from the payment system you use for ATM network connectivity, please state the reasons why	Have never considered switching
			Poor quality service
			Fees



		New service offerings from different
		payment system
		Technical concerns
		Other (please specify in free text
		field below)
		Tick Boxes
2e.4	Please use the following free text field to provide any further details of	r comments in regard to payment
	systems used for ATM network connectivity	
	Free text field	

Step 3 – Summary Questions

Category	Question Number	Questions
	3.1	What payment services (not related to any specific payment system) would you like to see from your sponsor bank(s) that are not currently available?
		Free text field
	3.2	What two things would make the most difference to your future access to payment systems?
		Free text field
	3.3	Are there payment services you require to drive new business, but are not available from your sponsor
Summary		bank(s)? Free text field
	3.4	Does your current back office systems capability limit the payments propositions you would like to offer your customers?
		Free text field
	3.5	Do you believe your sponsor bank can support you if you would like to provide innovative services to
		your customers that leverage existing payment systems?
		Free text field
	3.6	Any other comments
		Free text field



Step 4 – Attestation

Thank you for completing the PSR questionnaire on access to interbank payment systems. Please ensure you have checked all your answers and have gained the necessary approvals before submitting.

If you are ready to submit, please complete the fields below and click submit:

Category	Question Number	Questions
	4.1	Please enter your name
		Free text field
	4.2	Please enter your job title
Attestation		Free text field
	4.3	Please enter your email address
		Free text field
	4.4	Please enter the name of your organisation
		Free text field

All information and data provided through the questionnaire will be securely held and used for the purposes of capturing an industrywide view of access. All responses will be treated as an anonymous and will be used to help identify common themes and trends across the industry.

SUBMIT BUTTON

For reference purposes only – questionnaire to be completed online



Thank you for your time in completing the PSR questionnaire on access to interbank payment systems.

END OF SURVEY

List of abbreviations

The following table presents a list of the abbreviations used in the questionnaire.

- AML Anti-money laundering
- DCA Direct Corporate Access
- EEA European Economic Area
- M&A Mergers & acquisitions
- PSR Payment Systems Regulator
- SLA Service Level Agreement