

High level summary of
key comments from
submissions to PSR
consultation CP18/2

October 2018

Section	Comment	PSR Response
<p>3. Key Definitions</p>	<p>Some respondents commented on the timeline for notifying LINK of a closing ATM.</p> <p>One respondent noted that a 12-week notice period for an ATM closure may not always be possible due to the nature of some closures (such as a retail establishment closure).</p> <p>Another respondent suggested that a longer notice period of up to 26 weeks would give alternative ATM providers greater opportunity to step in before the closure happened.</p>	<p>We intend to monitor this aspect, including current notification practices, and consider it further based on feedback from LINK and other stakeholders.</p>
<p>5. Requirement to develop and adopt appropriate policies and measure</p>	<p>One respondent commented on the filters that LINK can apply to remove a 'Lost ATM' from its commitment to replace it.</p> <p>Specifically, some respondents highlighted the limitations of the Post Office and cashback as effective substitutes for a Lost ATM, including due to limited banking hours.</p>	<p>Our direction requires LINK to describe its policies, including its filters.</p> <p>We acknowledge the arguments regarding the limitations of a Post Office branch and cashback.</p>

Section	Comment	PSR Response
<p>6. Minimum requirements in relation to the Commitment</p>	<p>One respondent sought clarity about which parties are eligible to notify LINK of a free-to-use ATM that is considered to justify being protected despite it being within 1km of another free-to-use ATM.</p>	<p>We expect LINK to address this level of detail in its policies and measures. For example, it should clarify what is meant by ‘community or community representative’. LINK must publish its final policies.</p>
<p>7. Timeline for and reporting on the development and implementation of the policies and measures</p>	<p>Some respondents asked for a swift timeline for LINK to develop and implement its policies and measures regarding its commitments.</p>	<p>To ensure policies and measures are implemented as soon as reasonably possible, our direction sets the following timeline for LINK:</p> <ul style="list-style-type: none"> • Provide us with an initial draft of its policies and measures by 26 October • Provide a final version of its policies and measures by 14 November • Implement its policies and measures no later than 21 November

Section	Comment	PSR Response
<p>8. The ATM Replacement Procedure</p>	<p>Several respondents commented on the importance of LINK setting out a clear ATM replacement procedure. They had varying opinions about how long this process should take.</p> <p>One respondent noted that under certain circumstances (such as a lack of willing ATM operators or where planning permissions are required) the six-month period may not be achievable.</p> <p>Another respondent asked us to consider a shorter timeframe for replacing an ATM (for example, 12 weeks).</p>	<p>Our direction sets out specific deadlines for LINK to finalise its ATM replacement policies and processes. Having considered the consultation responses, our direction now sets the following timelines for LINK:</p> <ul style="list-style-type: none"> • Provide us with an initial draft of its proposed ATM replacement procedure by 26 October • Provide a final version of its proposed ATM replacement procedure by 14 November • Provide us with its detailed processes to implement the ATM replacement procedure by 14 December <p>LINK must publish its ATM Replacement Procedure and mitigation plan. We expect LINK’s policy to explain situations where a factor outside the control of the parties means that an ATM might not be live within the six-month period.</p> <p>We considered stipulating a shorter time frame for the replacement procedure; some Protected ATMs may be able to be replaced in a shorter timeframe. However, we do not consider a shorter time-period would be realistic in all cases. We will continue to monitor the effectiveness of LINK’s policies and processes.</p>

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10. Monitoring and reporting requirements	<p>Several respondents stressed the need for greater transparency with respect to LINK's Protected ATM network. They suggested that LINK should publish regular monthly updates/reports on its website.</p> <p>Respondents requested varying degrees of granularity in the data they thought LINK should disclose under these requirements.</p>	<p>Our direction covers the identification and inclusion of new Protected ATMs and we expect LINK's policies and measures to set out how they will account for this in their reporting.</p> <p>We expect LINK to publish information reported to us pursuant to Part 10, subject to issues of commercial confidentiality or sensitivity.</p> <p>We are also asking LINK to provide us with analysis of the impact of the reduction in interchange fees on the overall ATM estate.</p>
General	<p>Most respondents also made a number of general comments about potential future scenarios for ATM provision in the UK, and how funding arrangements might be structured in the longer term.</p>	

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