

N	Page	Subsection	Original Text	Comment	Status	Feedback to CG
1	88	3.2. TECHNICAL SPECIFICATION	Not in the original text - About compression	Will the files be compressed or not, or will both (uncompressed and compressed) be available? If the latter, how can they be recognized? If compression, with which compression method?	Clarification	No specific feedback to be provided to the CG.
2	83	1.7.1. A2A channel	For these reasons the Data Migration Tool (DMT) was chosen as a solution to allow a massive upload of several reference data objects.	Type: For these reasons the Data Management Tool (DMT) was chosen as a solution to allow a massive upload of several reference data objects.	Accepted	No specific feedback to be provided to the CG.
3	83	1.7.2. Data propagation between CRDM and TIPS	Following the initial propagation to TIPS, Limits can only be modified in TIPS.	We understood that we'll have the same behaviour also for Blocking status for TIPS Participants, Blocking status for TIPS Accounts and TIPS Credit Memorandum Balances	Accepted	No specific feedback to be provided to the CG.
4	79	1.5.1. TARGET2-Securities	Service-specific objects which only have meaning for one service (e.g. Authorised Account User and DN-BIC Routing for CRDM TIPS; Securities and CSD Account Links for T2S). These objects can only be viewed and maintained from the CRDM interface and have no bearing on the T2S application processes.	Please could you check? We think that some objects (Securities and CSD Account Links for T2S) can be viewed and maintained not only from the CRDM interface	Accepted	No specific feedback to be provided to the CG.
5	80	1.5.3. TARGET Instant Payment Service	No data propagation flow exists from TIPS to CRDM; data modified in TIPS does not influence the existing data in CRDM.	It could be useful to clarify this aspect also in the TIPS UHB and UDFS	Clarification	No specific feedback to be provided to the CG.
6	83	1.7.2. Data propagation between CRDM and TIPS	As such, the current version of CRDM does not allow to change these attributes	We understand that if the TIPS account (or Participant or CMB) is blocked in TIPS, then it is still seen as "unblocked" in CRDM. In our opinion this could be misleading for the user, therefore we propose to hide the view of the "blocking" attributes of TIPS accounts/participants/CMB in the CRDM. Furthermore, as far as CMB limits are concerned, we understand that the limit can be changed via CRDM only once (in the initial set up), after that the limit can only be changed in TIPS. Once the limit is changed in TIPS, the user still see in CRDM the old limit. If this understanding is correct, then we propose to make clear in the CRDM user interface that the value only refer to the "initial limit" of the CMB, and not to the current limit (i.e. by using appropriate labels/warnings).	Clarification	No specific feedback to be provided to the CG.
7	12	1.2.2.1.2. Privilege	Consequently, all the users and parties linked to the role are not linked anymore to the privilege, with immediate effect.	According to section 1.6.3 of TIPS UDFS v.0.9 "all reference data setup and maintenance operations – other than the immediate changes in the local reference data management – are performed in the CRDM and reference data are then propagated from the CRDM to TIPS asynchronously on a daily basis." Since TIPS performs the authorization task for the sender, checking if he has the appropriate privilege for the requested action, could you confirm that the removal of a privilege from a role or the removal of a role from a user take place immediately in CRDM and also in TIPS, before the daily propagation of reference data between CRDM and TIPS?	Clarification	No specific feedback to be provided to the CG.
8	50	1.3.4. Access rights management	The link between a User and a Certificate DN also contains a "Default" flag specifying whether the Certificate DN identifies the default User associated to the related Distinguished Name and a "Main User" flag specifying that it is the single User enabled to the TIPS Service.	could you please elaborate on the definition of Main User, does the user- certificate DN link marked with main user flag imply that the user only has access to the TIPS service as opposed to the T2S service.	Clarification	No specific feedback to be provided to the CG.
9	75	1.4.4.2. Structure	Table 35 – TIPS Directory Structure	Is row three of this table necessary? For example, assuming the user BIC is a BIC pertaining to a reachable party, the BICs in row 1 and 3 of the table would be the same, whereas row 4 would reflect the BIC of the account owner. If however the user BIC belongs to a party BIC then rows three and four would reflect the same BIC. what is the need for the information in row three which can be deduced by the difference between row 1 and 4.	Clarification	No specific feedback to be provided to the CG.
10	49	1.3.3.3. Description of the entities	Each Cash Account is linked to its relevant owner Party and Currency	seeing as the a TIPS Credit memorandum balance is defined as a type of cash account will the balance of this account be included in the TIPS General Ledger??	Clarification	No specific feedback to be provided to the CG.
11	80	1.5.3. TARGET Instant Payment Service	If needed, participants can request an ad-hoc propagation to be run at different times of day	Could you clarify how participants can request this adhoc propagation? We understand that only the TIPS Operator could trigger an adhoc propagation	Clarification	No specific feedback to be provided to the CG.
12	76	1.4.4.3. Generation	TIPS Actors may receive the TIPS Directory in two ways...	We understand that CRDM will not offer A2A connectivity before the full scope of ESMIG after T2/T2S consolidation. Could you please confirm that the push mode doesn't make use of A2A connectivity, so CRDM will offer both push and pull mode even if the A2A connectivity will not be provided?	Clarification	No specific feedback to be provided to the CG.
13	5	INTRODUCTION	General	Shouldn't in the Introduction be clearly mentioned that this is just for TIPS and that after we have had the consolidation the information will be separated to the UDFS of each single service? Wouldn't it be nice at this point to explain that in the context of TIPS and upfront the consolidation there is no A2A functionality but instead the DMT can be used?	Clarification	No specific feedback to be provided to the CG.
14	5	INTRODUCTION	The GFS present the solution envisaged for the Common Reference Data Management service from a functional perspective...	Please clarify to which GFS you are referring to. In TIPS we do not have a GFS. Therefore, we assume the T2S GFS is meant. Please clarify.	Accepted	No specific feedback to be provided to the CG.
15	5	INTRODUCTION	Diagram 12 DMT Interaction	General comment applying to all DMT-related information in the UDFS (see eg also section 1.2.1 and section 2.1.2 and section 3): In general, the information on DMT is in line with what has been discussed lately. However, so far no CR has been issued in order to introduce the DMT in the URD. In order to ensure a consistent documentation, we see the need to raise/approve a CR asap as according to the URD an A2A connection to CRDM is required (ie otherwise the related acceptance testys would need to be considered as failed). Although from a functional point of view this reflects the latest discussions and the information is needed due to the tight deadlines, there is the need to follow a consistent approach. All other CRs raised so far are not reflected in the CRDM UDFS although they have an impact as eg new privileges seem necessary for the payment status transaction query and the querying of LTs.	Clarification	No specific feedback to be provided to the CG.

16	12	1.2.2.1.2. Privilege	Table 2 Create DN-BIC Routing DN-BIC Routing - New DN-BIC Routing data within own System entity (for CBs) or for DNs linked to own Users and BICs authorised to own Cash Accounts (for Payment Banks). Yes	The information provided in table 2 seems to be different from the information provided in CR 674: "DN BIC Routing (new) - Operator, Central Bank"	Clarification	No specific feedback to be provided to the CG.
17	12	1.2.2.1.2. Privilege	Table 3 Create Technical Address Network Service Link Technical Address Network Service Link New Links within own System Entity (for CBs or for own Parties (for Payment Banks). Delete Technical Address Network Service Link Technical Address Network Service Link Delete Links within own System Entity (for CBs) or for own Parties (for Payment Banks).	The information provided in table 3 seems to deviate from the information provided in CR 674: "Technical Address Network Service - Operator, Central Bank"	Accepted	No specific feedback to be provided to the CG.
18	12	1.2.2.1.2. Privilege		It seems that the information provided in this section is not entirely in line with the information provided in CR 674. Please check to which extent payment banks are indeed allowed to use this privileges as it seems that this is different from the current T2S logic. http://www.ecb.europa.eu/paym/t2s/progress/pdf/crg/t2s_0674_sys.pdf	Clarification	No specific feedback to be provided to the CG.
19	12	1.2.2.1.2. Privilege	Table 4 - Privilege "Dedicated Cash Account"	Do you mean "Delete Cash Account"?	Accepted	No specific feedback to be provided to the CG.
20	12	1.2.2.1.2. Privilege	Table 7 - BIC Query Service List Query	Please explain who exactly can use the BIC query and where the details can be found as it is not entirely clear to us what the relevant U2A query in the CRDM UHB is. The same is true for the Service List Query. Where is this query described in the CRDM UHB?	Accepted	No specific feedback to be provided to the CG.
21	12	1.2.2.1.2. Privilege	Table 8	Please check to which extent adaptations to this section are necessary due to CR003 /CR004 which need to be added to the CR documents and which need to be included here once the CR are approved.	To be clarified by the requestor	No specific feedback to be provided to the CG.
22	12	1.2.2.1.2. Privilege	Table 8	Taking into account the information provided in section 1.7.2 it seems that the modification of "blocking" and "CMB Limit" can only be done in TIPS directly (ie change of local reference data). Although the approach might avoid inconsistent databases, it seems that the information provided here is not in line with the TIPS UDFS ("Blocking/unblocking status and CMB limit data maintenance operations are also available in the CRDM – refer to 1.6.3 "Common Reference Data Management" for additional information.") Please check and if needed a CR should be raised/approved asap.	Clarification	No specific feedback to be provided to the CG.
23	23	1.2.2.2.2. Configuration of privileges	Table 14 - Description I Without Deny, i.e. party administrators of the payment bank A can grant the privilege to query cash accounts to other roles and users of the same party;	What is the sense of granting a privilege with deny = true to a party? This would mean no user of this party can get it so the privilege is completely senseless. Please clarify	Clarification	No specific feedback to be provided to the CG.
24	36	1.2.4. Graphical user interface	Table 20: create report configuration, update report configuration, delete/restore report configuration, query report configuration list, query report configuration details	Additionally central bank should be able to act on behalf of a payment banks	Clarification	No specific feedback to be provided to the CG.
25	36	1.2.4. Graphical user interface	Table 20 Create DN BIC Routing Payment Bank Update DN BIC Routing Payment Bank Delete/Restore DN BIC Routing Payment Bank	The information provided here seems not entirely in line with the information provided in the previous section / CR 674. Please check.	Clarification	No specific feedback to be provided to the CG.
26	36	1.2.4. Graphical user interface	Table 20 Create DN BIC Routing Payment Bank Update DN BIC Routing Payment Bank Delete/Restore DN BIC Routing Payment Bank	Footnote 13 and 14 need to be updated. It should be "Update" / "Delete/Restore" instead of "Create".	Accepted	No specific feedback to be provided to the CG.
27	38	1.2.5. Security		It is not entirely clear how the access rights check is conducted. In order to upload a DMT file, the necessary privilege is needed. We assume that the privilege to do certain activities are checked in a second step. Nevertheless, it is not clear how NRO is ensured / needs to be ensured in case of DMT usage.	Clarification	No specific feedback to be provided to the CG.
28	44	1.3.2.1. Data Model of the component	As far as Payment Banks are concerned, when they are linked to the TIPS Service, the relevant Central Bank must specify whether the Payment Bank participates in TIPS as a TIPS Participant or as a reachable Party.	Not doubt about this, but the Database Scheme shown above does not provide this information, as for Party Type only three values are possible. i.e. Operator, CB, TIPS Participant	Clarification	No specific feedback to be provided to the CG.
29	44	1.3.2. Party data management	Payment Bank	As already addressed during the last round of comments, the party Type "Payment bank" is not known in the TIPS UDFS. In order to ensure a consistent description, it is of utmost importance that terms are used in a consistent manner. This is currently not the case. It seems that either a CR is needed or the description here needs to be aligned to the wording used in the TIPS UDFS.	Clarification	No specific feedback to be provided to the CG.
30	48	1.3.3.1. Data model of the component	CMB (is CMB for / is reference for CMB)	Could you let us know how this is implemented, as there is no other field, where this reference could be stored. So will there be an additional table where these references are stored?	Clarification	No specific feedback to be provided to the CG.
31	57	1.3.7. Report configuration	Frequency Frequency in hours for the generation of the delta reports. Not relevant for full reports, which will be generated daily and cover a 24-hour period. The exhaustive list of possible values is as follows: 3 hours 6 hours 12 hours	Owing to the fact that also for the TIPS Directory a report configuration is needed, please be so kind as to confirm that in this case the 24-hour period will be from 17.00-17.00.	Clarification	No specific feedback to be provided to the CG.
32	63	1.4.3. Common reference data maintenance process	Cash account data management Cash account	We understand that payment banks can use the DMT only for the CMB creation. Please confirm and be so kind as to add a footnote for clarification.	Rejected	No specific feedback to be provided to the CG.

33	67	1.4.3.3. Validity of common reference data objects	BIC Directory	Just for clarification. What exactly is the difference between the "BIC Directory" in CRDM and the "TIPS Directory"? We understand that the first one is the SWIFT BIC Directory and different from the TIPS Directory. However, in section 3.5.3.9, column 6 as possible values the BIC Directory is mentioned. We assume that IPS Directory is meant here. Please be so kind and to check the document and update the document to the extent necessary.	Accepted	No specific feedback to be provided to the CG.
34	75	1.4.4.2. Structure	This BIC identifies one and only one TIPS Account or CMB in TIPS	Maybe it would be clearer to say "This BIC is linked to ..."?	Accepted	No specific feedback to be provided to the CG.
35	75	1.4.4.2. Structure	Field no 3 - Party BIC: BIC that identifies a TIPS Participant or a Reachable Party in TIPS. This BIC is for information purpose only and it allows grouping all User BICs configured by a given TIPS Participant or Reachable Party. It cannot be used to address Instant Payments in TIPS.	It is the view of the drafting group for the T2 Guideline that only BICs can be configured as Authorised Account Users that identify a Participant or Reachable Party. (see Titel III, Article 12, No 3 of the Draft Annex II b: 3. The TIPS-DCA holder shall register as an authorized account user for settlement purposes. It shall only register its own BIC and/or that of a reachable party as authorized account user.) Could you please check if in consequence the User BIC automatically is always identical to the Party BIC? If yes, field no 3 in the TIPS Directory would be redundant and should be eliminated. If no, could you please provide an example of a constellation where these two fields could contain different BICs	Clarification	No specific feedback to be provided to the CG.
36	75	1.4.4. TIPS Directory		Owing to the fact that a report configuration is needed to receive the TIPS Directory, we propose to mention this for the sake of transparency here as well.	To be clarified by the requestor	No specific feedback to be provided to the CG.
37	76	1.4.4.4. Distribution	The name of the flat file that contains the TIPS Directory is as follows: TIPSDIRTTTTYYMMDD	In the TIPS CG, the possibility of an ad hoc intraday update and distribution in exceptional circumstances has been discussed. If this is an option, we suggest to extend the file name with an additional digit in order to include a version number.	Clarification	No specific feedback to be provided to the CG.
38	79	1.5.1. TARGET2-Securities	• Categorized shared objects which are used in both services but each instance has a specific link to a single service (e.g. Cash Accounts, Limits). These objects can be created and maintained from both the CRDM and the T2S interface, however instances related to CRDM cannot be viewed or created/maintained from the T2S interface and are not taken into account by other T2S application processes.	Does this mean on the opposite that from TIPS T2S objects can be viewed/created/maintained? If not may be this could be added.	Accepted	No specific feedback to be provided to the CG.
39	79	1.5.1. TARGET2-Securities	• Service-specific objects which only have meaning for one service (e.g. Authorised Account User and DN-BIC Routing for CRDM TIPS; Securities and CSD Account Links for T2S). These objects can only be viewed and maintained from the CRDM interface and have no bearing on the T2S application processes.	If you list Securities and CSD Account Links for T2S as an example, the second sentence is not correct (These objects ... have no bearing on the T2S application processes.)	Accepted	No specific feedback to be provided to the CG.
40	80	1.5.3. TARGET Instant Payment Service	No data propagation flow exists from TIPS to CRDM; data modified in TIPS does not influence the existing data in CRDM.	Is CRDM overwriting this modified data then?	Clarification	No specific feedback to be provided to the CG.
41	80	1.5.2. TARGET2	The CRDM Operator, in any case, has the ability to perform CRDM-specific updates on individual BICs	We assume that this includes the possibility to add BICs that are not published in the SWIFT BIC Directory but shall be used in TIPS payments as requested by the BIC holder. Could you perhaps mention this possibility explicitly here, as an example? We think that this could be an important information for banks which currently use unpublished BICs in SEPA payments.	Accepted	No specific feedback to be provided to the CG.
42	83	1.7.1. A2A channel	In addition, since it is not foreseen to enlarge the scope of available XML messages, all of the above solutions would allow to perform massive reference data upload only for a limited set of reference data objects (specifically, the ones which are currently available through A2A in T2S, i.e. Parties and Cash Accounts, including TIPS CMBs). Several reference data objects expected to have high cardinality would still have to be loaded in U2A mode.	If that is the case a U2A connection of a TIPS participant to CRDM has to be mandatory. Is that correct? Otherwise the participant is not able to enter user or DN links.	Clarification	No specific feedback to be provided to the CG.
43	83	1.7.1. A2A channel	For these reasons the Data Migration Tool (DMT) was chosen as a solution to allow a massive upload of several reference data objects.	Data Migration Tool or Data Management Tool? Please take care of consistency	Accepted	No specific feedback to be provided to the CG.
44	83	1.7.2. Data propagation between CRDM and TIPS	The concurrent change of this data on either side (CRDM and TIPS), taking into consideration the delayed propagation of data from CRDM to TIPS, could lead to inconsistent and unexpected results. As such the current version of CRDM does not allow to modify these attributes. While it is possible to set a value for Limits upon creation, this value is propagated to TIPS only as an initial limit value. Following the initial propagation to TIPS, Limits can only be modified in TIPS.	As already mentioned we understand the approach chosen here but it is not in line with the already approved documentation. Therefore, either a CR is urgently needed or the CRDM UDFS needs to be updated in line with the TIPS UDFS which is already approved and the basis for the acceptance testing. If this is not done, the current draft is not in line with the approved scope defining documents and needs to be updated.	Clarification	No specific feedback to be provided to the CG.
45	84	1.7.3. Archiving management	For this reason, and until the deployment of the fully-fledged CRDM, it has been chosen to avoid purging logically deleted data from the database. Specifically, this means that the retention period (currently set to three months) is extended indefinitely for reference data objects that are also used in CRDM.	Would the result of this decision be, that we wouldn't be able to reuse a deleted accounting number or user name until 2021?	Clarification	No specific feedback to be provided to the CG.

46	84	1.7.3. Archiving management	The absence of a long-term archive in CRDM would entail that keeping the purging mechanism leads to data being removed for good from the system. For this reason, and until the deployment of the fully-fledged CRDM, it has been chosen to avoid purging logically deleted data from the database. Specifically, this means that the retention period (currently set to three months) is extended indefinitely for reference data objects that are also used in CRDM. These objects include Party, Technical Address Network Service Link, Party Service Link, Cash Account, Authorised Account User, Limit, Role, User, DN-BIC Routing, User-Certificate DN Link, Certificate DN, Message Subscription Rule Set, Message Subscription Rule, Restriction Type, Report Configuration	We do not question the approach chosen if it is feasible in terms of performance for T2S. However, please note that neither the TIPS URD nor the TIPS UDFS refer to any intermediary solutions. Having in mind that the acceptance test are done based on the approved functional documentation, a CR seems necessary in order to ensure that we have a consistent functional documentation.	Clarification	No specific feedback to be provided to the CG.
47	86	2.1.2.2. DMT File Validation	CRDM performs a technical validation on the uploaded file to ensure that the technical constraints have been respected.	Will this technical validation include the check, if the sender of the file have the access rights to create the specific static data? If not, how will the TIPS operator check, if a participant have the needed access rights to create static data in the data scope? If such a check is not implemented, a participant could create or change static data for a different participant.	Clarification	No specific feedback to be provided to the CG.
48	86	2.1.2.5. DMT File Results Provisioning	Once all of the records in the uploaded file has been sent and processed by the back end module which provided the related result, the DMT File Result is consolidated.	Grammar: Once all of the records in the uploaded file have been sent ...	Accepted	No specific feedback to be provided to the CG.
49	88	3.1. INTRODUCTION	The data can be produced in Excel or flat file format by the user and submitted to CRDM via a web application.	As already mentioned an approved CR is urgently needed as the current TIPS URD refer to an A2A access to CRDM, but not to DMT. Where will we find further details on the application mentioned here? Moreover, does ESMIG play a role?	Clarification	No specific feedback to be provided to the CG.
50	94	3.5.3. Common Reference Data	General	The list 3.5.3.1 - 3.5.3.16 contains all descriptions for "New" reference data. Is the same format to be used in order to update existing data?	Clarification	No specific feedback to be provided to the CG.
51	94	3.5.3.1. Party Reference Data - New	4 D Type Possible values: • PMBK • Classification of the party: • PMBK = Payment bank	Please be so kind as to explain why the payment bank is mentioned here and not the CB of the respective payment bank.	Clarification	No specific feedback to be provided to the CG.
52	106	3.5.3.9. Report Configuration - New	BIC Directory	"BIC Directory" or "TIPS Directory"?	Accepted	No specific feedback to be provided to the CG.
53	108	3.5.3.12. Cash Account		We assume that an appropriate access right check ensures that banks can only create CMBs. Please confirm.	Clarification	No specific feedback to be provided to the CG.