From:	Eddie Smith
To:	▮▮
Cc:	▮▮▮▮▮
Subject:	Re: Review into Open Banking in Australia - One more day to have your say.. [SEC=UNCLASSIFIED]
Date:	▮▮▮▮▮▮▮▮▮▮
Attachments:	image001.jpg

Hi Jane,

Thank you for the opportunity to respond in brief.

In summary:

- We agree in general with the approach and recommendations in the report.
- We would suggest aligning with the OAuth2 FAPI Specification as an original point. This is based on the UK Standards which would allow Australia to have greater input into the standard definition when compared with the UK Standard.
- We recommend that Screen Scraping is expressly denied as a mechanism to exchange data. It does not provide or allow for granularity of permissions or consent from the user at the data source and as a result represents a security and trust risk to end customers that Open Banking has the opportunity to and should close.
- Developer experience, self service and ease of use is essential to the success of the Open Banking initiative. While nothing in the report specifically impacts this area, it should be a consideration for the initiative and, for parties involved with the definition of standards and data exchange. Tools to assist with developer engagement should also be considered, such as the establishment of standard complaint sandboxes, developer documentation, code samples and SDKs.

We look forward to working with Treasury further on this initiative.

Kind Regards

Eddie Smith
Versent