Digital Service Providers Australia New Zealand

Access Point/SMP Migration & Exit Focus Group
Meeting 6, 4 August 2022

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Focus Group Purpose & Expected Outcomes

Purpose

The group is primarily for advisory and consultation purposes to facilitate open discussion and collaboration with stakeholders across the Peppol network, particularly end users and their providers, enabling them to:

● Share experiences and challenges throughout a stakeholders' Peppol journey

● Explore complex business and technical issues and propose solutions/options to local Peppol Authorities and/or OpenPeppol

● Consider opportunities/proposal to enhance the benefit/value of the Peppol framework to A-NZ end users

Expected Outcomes

Detailed discussions on specific issues will be addressed by focus groups, to enable in-depth understanding and cost-benefit analysis of various options. This may lead to:

● Proposing a solution/change to the relevant group, including the Peppol Authority and OpenPeppol for change management, e.g. via an OpenPeppol request for change (RFC).

● Forming a basis to develop guidance or best practice materials for the A-NZ Peppol community.

● Initiating discussion or escalating issues to OpenPeppol as required.

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Today's Agenda

1. Acknowledgement of Country

2. New principles:

    1. For review: Hostile / unresponsive or exiting Service Providers (how / when PA or OpenPeppol may need to intervene and support)

    2. To be discussed: Data retention and deletion once an end user has deregistered

3. Considerations to support developing clauses / contracts re deregistering or SP switching

4. Wrap up and Next steps

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Agreed principles / recommended practice

1. All end users should have the ability to de-register. This should be enabled by the party whom the end user has a service contract with (e.g. BMS or Peppol SP).
E.g. The deregistration process / information may be clearly stated in the contract or via product UI. For example, a button to request de-registration. This acknowledges SME end-users are often unaware of their Peppol SP.

2. Once the end user no longer has access to its service(s), the existing Service Provider (BMS or Peppol SP) must immediately deregister an end user from SML. E.g.

1. If an end user decides to switch to another BMS/Peppol SP; the deregistration date should be mutually agreed;
2. If an end user loses access to services due to termination or suspension of licence/contract due to nil or late payments, the BMS/Peppol SP must deregister the end user from SML immediately.
3. If an SP ceases operation, it must inform all end users and arrange a date for deregistration.

The Peppol SP is responsible for ensuring the partnering BMS provider gives timely advice when a client leaves or has access removed.

3. Gaining SP (BMS or Peppol SP) cannot automatically 'force' the existing SP to release a Peppol ID. An end user can request deregistration:

1. With the BMS whom the end user has a contract/licence with
2. as directed by the BMS, with the Peppol SP that integrates with the BMS
3. With the Peppol SP whom the end user has a contract with.

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Agreed principles / recommended practice (Cont.)

4. The existing Service Provider (BMS or Peppol SP, whom the end user has a contract with) must verify that a deregistration request is valid, i.e. raised by an authenticated and authorised end user before completing deregistration.

5. The existing SP (BMS or Peppol SP), should, in simple business terms, highlight the Peppol features/functions the end user will lose by switching. The existing provider should provide enough information to support the end user to make an informed decision, which could specify:

1. Which document type(s) is no longer supported;
2. Which capability will be lost for each document type: send, receive, or both;
3. A timeframe for the end user to consider and confirm whether they will proceed with deregistration;
4. Information about how the switch will happen; and
5. Once you deregister, this will not impact your ability to register for eInvoicing again.

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Agreed principles / recommended practice (Cont.)

6. 'SLA' for single or small batch of deregistrations:

1. The technical process should be completed as close to real time as possible after the end users confirms their request

2. Practical considerations include communications between different system components (e.g. BMS to Peppol SP), or systems may have built-in schedules, e.g. updating user status every 24 hours.

3. The above should be clearly documented in the service contract with the end user.

7. 'SLA' for bulk deregistration is negotiated on a case by case.

Bulk deregistration may be involved when a BMS changes partnering Peppol SP or a Peppol SP ceases operation. This should be managed case by case (e.g. as negotiated between the BMS and the Peppol SP) and users in most cases will be unaware of the change.

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New Principles – for review and discussion

1. **If a Service Provider if hostile or unresponsive, the end user can contact their new Service Provider for assistance**
   1. Gaining Service Provider can use available contact details to attempt to resolve the issue with the existing Service Provider
   2. Failing a resolution, the end user or the gaining Service Provider can escalate the matter to the lcoal Peppol Authority who should act as a neutral party
   3. **For discussion:** how would a PA verify the request, e.g. what level of KYC is required? What 'criteria' can a PA use to assess the case and decide whether to escalate to OpenPeppol?
   4. The local PA can request OpenPeppol to intervene and remove the SML listing.
2. **When a Service Provider ceases operation, they should inform all of their end users**
   1. Agree to hand over their end users to a new Service Provider
   2. Allow end users the opportunity to find new Service Providers themselves
3. **For discussion:** should there be a requirement for SPs to delete an end user's data once the end user has been deregistered (unless otherwise agreed / contracted)?

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New Principles – for review and discussion

Deregistration/switch SP related considerations when developing clauses / contracts with an SP to ensure a smooth and supported transition with minimal business interruptions.

1. Sending vs Receiving functions
   Although most entities use the same SP for both sending and receiving, deregistration is more important for receiving capability. I.e. an end user's Peppol ID must be released by the current SP before it can be used / registered by the new SP to receive. An end user can use different / multiple SPs to send.

2. Deregistration process and SLA
   E.g. how to request deregistration, timeframe to verify and confirm request, negotiate date for deregistration (date may be different for disable sending capability or other services), timeline communication once deregistration is completed.

3. Dedicated support for the transition
   Point of contact / dedicated support from the current SP during the transition.

4. Data ownership and retention
   Clarify data ownership for e.g. Peppol ID, registration related data; transaction logs, backup, etc. What data should be handed over to the end user before the switch; should the SP delete this data once the service contract ends.

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