



EUROPEAN CENTRAL BANK

EUROSYSTEM

Template for comments

Public consultation on the draft ECB Regulation amending the Regulation on payments statistics

Institution/Company

Dutch Payments Association

Contact person

Mr/Ms

First name

Surname

Email address

Telephone number

Please tick here if you do not wish your personal data to be published.

General comments

Banks need to report on number of ATM's, as well as the value and number of withdrawals at these ATMs. To get a better and more complete picture of all ATM's in a country, it would be just to also request all Independent ATM Deployers (IADs) to report statistics on number of ATMs they operate, as well as the value and number of withdrawals at these ATMs. Could you please consider to include reporting by IAD's in the Reporting Regulation as well as data on the geographical location of these ATM's in order to assess the access to cash. Due to the different market settings in each country, NCBs should take care to include also the the value and number of withdrawals at ATMs of Independent ATM Deployers (IADs) and their locations by country. This can be done directly, if PSD2 regulated, or indirectly via the respective acquirer

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Please enter all your feedback in this list.

When entering feedback, please make sure that:

- each comment deals with a single issue only;
- you indicate the relevant article/chapter/paragraph, where appropriate;
- you indicate whether your comment is a proposed amendment, clarification or deletion.

Deadline:	7 May 2020
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ID	Chapter	Article	Paragraph	Page	Type of comment	Detailed comment	Concise statement as to why your comment should be taken on board	Name of commenter	Personal data
1	Annex III	Reporting Schemes		3	Amendment	Banks need to report on number of ATM's, as well as the value and number of withdrawals at these ATMs. To get a better and more complete picture of all ATM's in a country, it would be just to also request all Independent ATM Deployers (IADs) to report statistics on number of ATMs they operate, as well as the value and number of withdrawals at these ATMs. Could you please consider to include reporting by IAD's in the Reporting Regulation as well as data on the geographical location of these ATM's in order to assess the access to cash. Due to the different market settings in each country, NCBs should take care to include also the the value and number of withdrawals at ATMs of Independent ATM Deployers (IADs) and their locations by country. This can be done directly, if PSD2 regulated, or indirectly via the respective acquirer	To get the full picture of all available and used ATMs (incl. location) in a country one cannot exclude certain 'nonbank' ATM's.		Don't publish