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| European Banking Authority (EBA) |  **Division Bank and Insurance**Austrian Federal Economic ChamberWiedner Hauptstraße 63 | P.O. Box 3201045 ViennaT +43 (0)5 90 900-DW | F +43 (0)5 90 900-272E bsbv@wko.atW http://wko.at/bsbv |

Your ref., Your message of Our ref., person in charge Extension Date

 BSBV 115/Dr.Pr/Dr.Eg/We 3132 8 January 2015

**EBA – Consultation on Guidelines aimed at standardisation of fee terminology for payment accounts in the EU (EBA-CP-2014-34)**

The Division Bank and Insurance of the Austrian Federal Economic Chamber, as representative of the entire Austrian banking industry, appreciates the possibility to comment on the above cited consultation paper and would like to submit the following position:

On page number 5 second paragraph it is written:

"The Directive includes four mandates for the EBA. The first mandate for the EBA is to issue Guidelines to ensure the sound application of the criteria set out in Article 3(2) for the Member States (MS) to establish provisional lists of the most representative services linked to a payment account, by 18 March 2015."

On the other hand on page 13 subitem 14. it is written:

"Competent authorities shall submit the provisional list in accordance with Article 3(3) of Directive 2014/92/EU by 18 September 2015."

It is necessary to know, by which date the Member States have to submit the provisional list - by 18 March 2015 or 18 September 2015?

In this context we want to point out that it is also important that the final list has to be published at least one year before the implementation-date.

Concerning the suggested methodologies under subitem 6.1. (page 20 and 21) we think that "collecting data through PSP's collaboration" would be reasonable.

Concerning the templates on page 27 and 28 we would suggest to name Type 3 instead of "Domestic payment services" "SEPA payment services" and Type 4 "International payments and Foreign Currency related servives" "NON-SEPA payment services".

We ask you to give our remarks due consideration.

Yours sincerely,

Dr. Franz Rudorfer

Managing Director

Division Bank and Insurance