

12th January 2015

Payment Systems Regulator
Consultation response team
25 The North Colonnade
London
E14 5HS

Dear Sirs

Response to PSR CP14/1

A new regulatory framework for payment systems in the UK

TISA is pleased to attach its response to this important consultation

TISA is a not-for-profit membership association operating within the financial services industry.

TISA's membership comprises over 145 member firms involved in the supply and distribution of savings and investment products and services.

These members represent many different sectors of the financial services industry, including banks, stockbrokers, asset managers, insurance companies, fund managers, distributors, building societies, investment managers, third party administrators, consultants and advisers, software providers, financial advisers and pension providers.

Following an instruction to the industry from the FSA in 2010 to tackle long delays and high costs for re-registration of assets between fund supermarkets, ISA managers and fund managers, TISA established an industry group to tackle the problem and forestall the need for detailed regulation. In 2011 TISA Exchange (TeX) was established.

TeX is a not for profit industry association. Members sign up to a standard published contract and SLA. There is an open standard (ISO20022) message set. Governance is through an elected Board, with 3 Directors elected by asset managers, 3 by service providers (platforms) and three for multi-roles, where businesses combine both activities. TISA provides the Chair and two other additional directors. Interested parties such as solution providers can join as associates (non voting). This structure allows for meaningful access and input from stakeholders. Operationally there is an SLA Council which monitors MI, adherence to SLA and recommends changes and improvements, a Legal Council, for recommending changes to the legal documents and a forum, chaired by TISA, where solution providers can tackle technical issues, particularly around connectivity and interpretation of standards. TISA ensures that these type of meetings cannot become anti-competitive. All members are welcome to attend meetings of the SLA and Legal Councils

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We believe that this form of governance, which allows meaningful input from all industry participants, including third party administrators and suppliers, is a good model to adopt.

We should be very pleased to discuss this approach with you in more detail.

We should like to be considered for a place on the Strategy Forum and associated technical committees that will be formed by you in the coming months, as we believe that our experience in the successful development of cross industry initiatives, such as TeX, would support the regulators objectives.

In addition, as TISA is not tied to a specific part of the financial services industry by its membership - our members are drawn from across the whole of the industry - we can provide an independent perspective on issues and proposals that affect the industry and its end customers - retail consumers and users of payment systems.

I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey Mushens', written in a cursive style.

Jeffrey Mushens, Technical Director, TISA