

10 February 2023

To post on git hub:

Subject: Noting Paper 280: CX of Authentication Uplift (Data Standards Body Consumer Experience Working Group)

The CBA welcomes the opportunity to provide feedback to the Data Standards Body (DSB) on Noting Paper 280 and supports continued enhancement of authentication measures within the Consumer Data Right (CDR) as a general principle.

We believe the future success of CDR will rely on strong consumer engagement built upon the foundations of trust, privacy, and security. It is therefore critical to ensure that the consumer experience is as seamless and as secure as possible.

Our response to the feedback questions is set out below.

Feedback questions

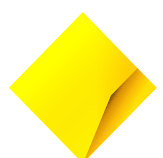
- [Do you agree with the preliminary scope for authentication uplift research?](#)

The CBA broadly agrees with the preliminary scope. We propose the clarification of x2app such that the 'app' is the Data Holder's primary digital channel and the authentication method is simply the existing method for that digital channel. We also suggest the following points be included as part of the authentication uplift research:

- What percentage of customers use App versus Web. This will help with what method of authentication is best for consumers and present alternatives that are more secure (e.g., App to App vs Web to App – as web can pose various phishing risks).
 - The harmonisation of CX between authentication and authorisation (or consent) should be considered.
- [Are there other authentication approaches, models, or elements that the DSB should consider – including any authentication approaches that you may be looking to support in the future? If so, you are invited to provide a justification for any alternative approaches and your views on their priority.](#)

The CBA believes that the DSB should consider the following in the context of future changes to authentication:

- The use of phishable factors, e.g. an OTP, needs to be deprecated.
- We expect that x2App will provide the most secure, lowest friction authN journey for the most users.
- Users should be authenticated via their banking app using the same credentials / method as when directly accessing their account using the app.
- Decoupled flows need to be approached with caution as the relying party may require prior knowledge of a bank's customer identifier, and that identifier is PII that should be kept secret.
- Authentication assurance levels should be considered. For example current OTP authN method may be OK for read access but x2App with two or more factors required for Action Initiation.



Consumers understanding of why a more secure authN path is required for AI should be investigated.

- Government should provide better consumer education around safe data sharing practices and announce a plan to sunset screen scraping to encourage organisations to migrate to the CDR to help address the rapidly increasing incidences and record cost of fraud and scams with the ACCC reporting \$2b billion was lost in 2021 alone.

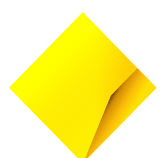
Will the preliminary scope and approach to authentication uplift sufficiently support a broad range of consumers, demographics, contexts, and needs? If not, what considerations should be made? This may include factors relating to, for example, location, use cases, accessibility, inclusivity, and digital literacy.

The CBA generally agrees that the scope and approach will support a broad range of consumers. We suggest the following points are also taken into account:

- Digital literacy - what are the technologies available to our customers in their own environment (Covid has forced a lot of people to go remote and update their technology).
- Customer's behaviour and adoption of technology change rapidly over time so on-going research of these behaviours are important.
- Do you agree with the measures and metrics being used to assess the CX of various authentication approaches? If not, what alternative methodologies and considerations should the DSB consider?

The CBA supports the methodology proposed to assess CX. We suggest the following points, alongside further research, are also taken into account:

- A/B testing.
- Contextual inquiry - observing users in their natural environment, a method used to gather information about what technologies users have available to them and how they use them in their daily lives.
- The Action Model by BJ Fogg: This model is an extension of the Fogg Model, it includes the Action phase, which focuses on the behaviour itself, and the three elements that influence it: motivation, ability and the trigger.



- The DSB has commenced a separate consultation on accessibility uplift following an independent review. Are there any factors relating to accessibility uplift, such as relevant Web Content Accessibility Guidelines (WCAG) that may impact or be relevant to authentication uplift? Relevant issues are invited to be raised as part of feedback to this noting paper, or in the dedicated accessibility uplift consultation in Noting Paper 279.

The CBA believes that accessibility should play an important part in the authentication uplift and suggests consideration be given to *all assistive technologies for better accessibility* so that the resulting solution can be easily integrated (e.g. screen reading software) to ensure that it is inclusive.

Thank you for the opportunity to comment. Please contact us at CBAOpenBanking@cba.com.au should you wish to discuss any of our feedback.

Yours sincerely,

CBA Open Banking team.

