Australian Banking Association

DP-240 – ADR Metrics

The Australian Banking Association (ABA) welcomes to provide feedback on the Data Standards Body (DSB) Decision Paper 240 on Authorised Data Recipients (ADR) Metrics. The ABA supports collecting data that can be used to provide clear and measurable metrics.

Our view

It is the ABA's view that overall the proposed metrics in this Decision Proposal (DP) do not provide measurable outcomes that can be directly acted upon within a clearly defined framework. Rather, these only provide general insights. However, more specific feedback for each of the proposed metrics follows below.

The preference of the ABA is that provision of these metrics should be voluntary. The ABA also does not see significant value in providing manual reporting on an ad hoc or periodic basis as work would still be required by ADRs to collect the required metrics. For example, some of the metrics outlined, such as the data latency proxy metrics, would require specific implementation effort for an ADR to determine.

Minimum Specified Metrics

Proposed Metric	ABA feedback
Average response time for the period	It is unclear how this metric could be used for accurately measuring DH performance. Measuring the average response time from an ADR's perspective adds additional hops to the response, thereby making it challenging to determine whether possible performance issues are due to the ADR or DH.
Number of invocations for the period	It is unclear how this metric could be used for measuring either DH or ADR performance as the number of invocations would not directly provide a measure of performance.
Number of rejections arising from exceeded traffic thresholds for the period	It is unclear how this metric could be used for measuring either DH or ADR performance. The ABA seeks clarity whether the DSB's intent is to determine if throttling is being unnecessarily applied. If so, then clear, objective measures would need to be introduced along with a framework for extracting the results from the metrics API and outlining clear steps to be implemented if issues are identified.
Number of error responses for the period	ABA seeks clarity as to the objective of this proposed metric. This data appears to be more of a qualitative measure than a quantitative measure which is not an effective way to measure API performance.
Number of non-conformant response payloads for the period	The ABA believes that remediating non-conformant response payloads could be best addressed by first identifying the underlying issues causing these problems, and subsequently managing them through the CDR Maintenance Iteration process.

Additional metrics

Proposed Metric	ABA Feedback
Metrics broken down by endpoint (aligned to the consultation on Endpoint Metrics)	During the consultation regarding DP 164, DHs supported not implementing Endpoint Metrics due to limited perceived value and implementation complexity. Those views apply to this proposed metric as well. Even if these metrics were to be introduced, it would still not be possible to derive meaningful metrics as there is no way of comparing 'like for like' with DH metrics.
Specific proxy metrics to measure data latency such as the minimum age of the most recent bank transaction or energy billing event received	Proxy metrics do not provide an accurate measure of actual data latency (according to the definition of data latency provided in the Standards).
Subjective assessment by the ADR of the quality of the data provided	Subjective assessments cannot be measured via a metrics API and are not ordinarily considered suitable metrics.
Drop off rates returning to the ADR during the consent flow	ABA seeks clarity as to the objective of this proposed metric. 'Drop offs' can occur for a number of reasons.
Metrics related to security endpoints as well as resource endpoints	ABA seeks clarity as to why this has been included. The recommendation in this Decision Proposal states that metrics for security endpoints will not be included in the ADR Metrics API.
The highest version of the endpoint requested and returned	ABA seeks clarity as to the objective of this proposed metric. All supported endpoint versions should be valid.
ADR counts related to customers such as number of consents created, expired or withdrawn	ABA seeks clarity as to the objective of this proposed metric. The objective of this proposed metric does not appear to align to the objectives set out in DP 145 and 245, as the purpose of this metric appears to be related to providing insights into the overall status of the CDR regime via the specified ADR metrics.

Thank you for the opportunity to provide feedback. If you have any queries, please contact me at Prashant.ramkumar@ausbanking.org.au

Yours sincerely,

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