

# Brand and Licence Company

Mr. Kristiaan Roefs  
Oversight Unit  
National Bank of Belgium  
Boulevard Berlaimont 14

1000 Bruxelles

Brussels, 30th August 2007.

Dear Sirs,

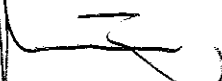
**Re.:** Comments on the « Oversight framework for Card Payment Schemes (CPS) ».

Please find hereafter the comments of the Brand & License Company regarding the draft document « Oversight framework for card payment schemes - Requirements » (April 27, 2007), issued by the ECB.

For your information, the Brand & License Company is the company that mainly manages the licenses and payment schemes of the Bancontact/Mister Cash and Proton cards. Its shareholders are the following banks : Fortis Bank, Dexia Bank Belgium, KBC Bank, ING Belgique and AXA Bank Belgium.

1. The geographic area should be clarified: which countries are concerned?: the SEPA countries, the Euro-System countries, the acquirers from outside the UE/SPA but who are active in the UE? The NBB replied to this question that the requirements will be applicable for all the CPS that are active in the Eurozone.
2. It would be useful to define clearly who will be considered by the oversight: the issuer of the card, the cardholder, the acquirer, the processor, etc... as well as the responsibilities of each of these participants.
3. Does the oversight of the ECB also apply to a CPS that is not « SEPA Cards Framework (SCF) Compliant »?

Best Regards,



Didier Waterkeyn  
General Manager

cc: Mrs Anne Demelenne – Febelfin