**An Accreditation System Should not Hamper Competition with a barrier to entry**

* It is my view that while there should be an accreditation system, if a customer of a bank wishes to share their data with a non-accredited party, then they should be able to do so.
* Also, if the customer wishes to share their data with only accredited parties – then the customer can opt to make that choice as well.

**Mandatory Accreditation in order to consume data should not be there**

* Mandating that accreditation is required, to consume data, would significantly affect the ability of incumbent start up firms in this environment from competing with larger more well established firms.

**Participation Should not be restricted in any way: Otherwise Competition will suffer**

“…some submissions argued that Open Banking should be…. at least in its initial phase…be applied to a relatively narrow set of data types and participants, or based on specific ‘use cases’

* I strongly disagree with this approach. Again this would severely hamper competition as the initial early-mover participants would gain a huge advantage in developing market share compared to participants who can only arrive, by government fiat, later on.

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