FPC Fall Member Meeting 2025







FPC Fall Member Meeting 2025

Practical Path to Innovation for the Pay by Bank Revolution

September 4, 2025

JEN LUCAS
Partner
US Lead for Payments Consulting
Ernst & Young

MATTHEW FRIEND
Managing Director
Head of New Payment Rails
JPMorgan Chase

Disclaimer

The views presented here are those of the individual speakers and are not necessarily the views of their respective companies.

Although this presentation includes examples, it is not intended to be relied upon for any purpose. If you or your organization recognize anything in this presentation as applying to your specific situation, you may want to consult with your own company and it does not carry any right of publication or disclosure, in whole or in part, to any other party. This presentation is for information purposes only and may be incomplete without reference to, and should be viewed solely in conjunction with, any oral briefing provided by or other discussions with the speakers. Neither this presentation nor any of its contents may be duplicated, published or disclosed (in whole or in part) or used for any other purpose without the prior written consent of the speakers.





Pay by Bank has many opportunities to meet customer expectations

FPC Fall Member Meeting 2025

What is Pay by Bank (PBB)?

What are the current gaps in Pay by Bank rules?

Opportunity

PBB transactions are noncard commerce payments that use retail bank accounts for purchase of goods and services

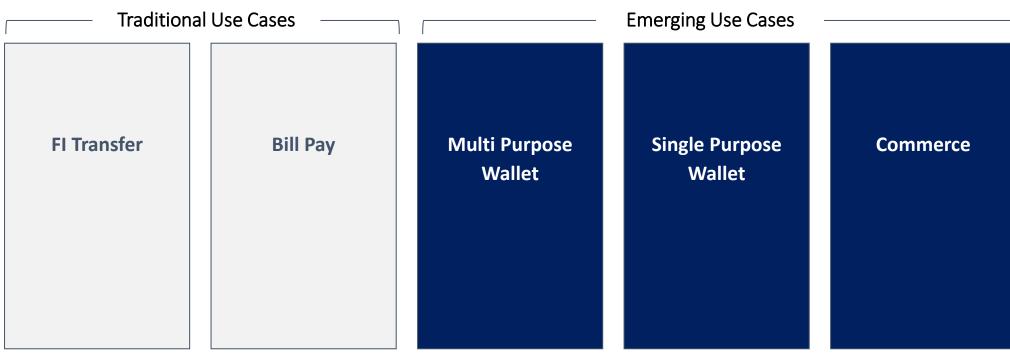
1	Existing payment rails were designed for transfers and bill pay and not intended for emerging use cases such as wallets and commerce
2	Disputes and purchase protection experiences do not meet customer expectations
3	Fraud and risk management tools and requirements are not comprehensive enough to address emerging risks
4	Networks do not have standardized, enriched data to limit fraud
5	New rails must develop capabilities, standards, and enforcement mechanisms to address the emerging use cases

Align on new rules to improve risk management, increase operational efficiency and enhance the customer experience.



Use cases are evolving as Pay by Bank grows

New open banking technology has led to the expansion of use cases in Pay by Bank

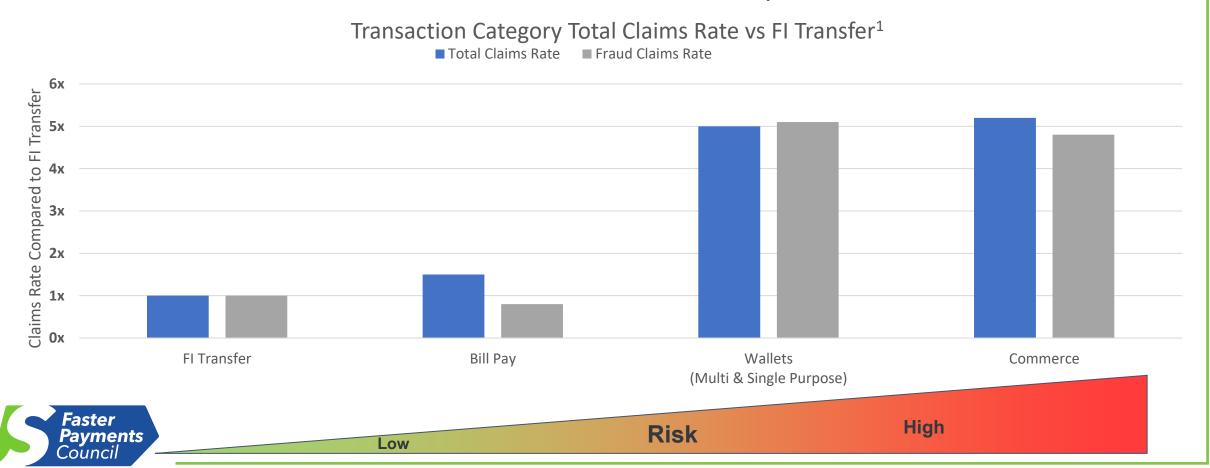




ACH Transaction Tagging Enables Critical Risk Insights

FPC Fall Member Meeting 2025

- Single & Multi-purpose wallets have ~5x the rate of claims and fraud of FI Transfer transactions
- Commerce has ~5x the rate of claims and fraud as FI Transfer and Bill Pay



Chase customer feedback illustrates risks to consumers as Pay by Bank becomes adopted

Customer Quote

"I didn't even realize my account was linked", "it [the payments] goes way back"

"Did you block the merchant from my account" "are you kidding me? You're going to let this merchant keep pulling from my account" 2



There are practical rule proposals to improve Pay by Bank across the payment lifecycle

Foundational Elements

- How can standardized and shared network level data address gaps?
- What role does sustainable economics play?
- What capabilities can address new fraud and scam threats?

Participation Risk Management Pre-Transaction

- How can merchants
 prepare for the increased
 risk, fraud and customer
 disputes in pay by bank
 commerce use cases?
- What capabilities can reduce first party fraud in PBB?

During Transaction

- What are payment authorization best practices?
- What real-time fraud detection tools can be implemented?

Post-Transaction and Servicing

- How can a clear liability framework protect all parties involved?
- What tools and processes can ensure transparent and efficient claims resolution?
- What measures can be taken to strengthen monitoring and enforcement for excessive claims?





