



Draft Specification & Bulletin Industry Feedback Form

Company Name: Decionis, Inc.

Primary Contact Name: Festus B. Jejelowo, Founder (festus@decionis.com)

Working Group or Task Force: Agentic Payments Submit feedback under the category 'General, Agentic Payments' here:

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Document: EMV Agentic Payments – Framework for Specifications v1.0 DRAFT: Comment period ends 30-Sept 2026

Date: 6 September 2026

EA/Sub ¹	Clause No./ Subclause No. /Annex)	Paragraph/ Figure/Table/Note	Type of comment ²	Comment (justification for change)	Proposed change	EMVCo Use Only	
						Status (Accept, Reject, In progress)	EMVCo observations on each comment submitted
DCI	4.3.5 6.7.6	p. 29–30; p. 48, paras 3–4	te MAJOR	§4.3.5 says Fulfilment 'may be evaluated against' the Payment Mandate, Constraints and Bindings, and §6.7.6 describes stateless and stateful evaluation, but neither says when the final values are evaluated nor that the outcome is recorded. In autonomous mode the world changes between delegation and Fulfilment: prices move, a budget is partly consumed by another order, a recurrence is amended. An evaluation performed at any earlier point is evidence that the action was acceptable when checked, not that the values that cleared were still within the open mandate. As an implementer of this function outside card rails we measured the difference in a deterministic harness: request-time	Add to §4.3.5 and cross-reference from §6.7.6: 'Fulfilment evaluation is performed against the final values immediately before the payment authorisation request is submitted, against the current lifecycle and state information (§5.5), and its outcome is materialised as an Autonomous Fulfilment artefact (§5.6) that references the Intent, the order, the Constraints evaluated and the state position used.'		

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				evaluation alone admitted stale execution in half of contested attempts and replay or substitution in all of them; evaluating at commit against the exact values, a single-use nonce and the current state position admitted none (technical note, DOI 10.5281/zenodo.22081954).			
DCI	5.4 4.1 6.9.2	p. 34, lifecycle list; p. 22, last para; p. 23, last sentence of 4.1.2; p. 49	te MAJOR	§4.1 notes that an autonomous interaction 'may revert to being immediate if Consumer interaction is required', and §4.1.2 that the agent informs the Consumer 'if the instruction cannot be fulfilled and a new authorisation is required'. The lifecycle categories in §5.4 have no state for this: an order is registered, approved, completed or failed. The most common autonomous-mode edge case in our production experience is	In §5.4 add an order-level category, illustrative like the others, e.g. HELD_PENDING_CONSUMER: (a) entered when a Fulfilment is evaluated as outside the open mandate's Constraints and the Agent requests Consumer confirmation; (b) bounded validity and single use; (c) exit only by a new Consumer consent bound to the closed values, or by expiry to FAILED; (d) the consent and its signer are carried in the Fulfilment artefact (§5.6). Cross-reference		

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				not fraud but a small, explainable overrun of a budget cap (a shipping fee the agent did not anticipate). With only within-bounds and outside-bounds as outcomes, participants either fail such orders or train Consumers to authorise generously, which erodes the meaning of Constraints. The reversion the framework already describes deserves a named order state with defined semantics: held for a bounded window, single use, resolved only by a fresh act of Consumer consent over the closed values (in VI terms a new Layer 2 over the specific closed mandate), and recorded in the Fulfilment artefact rather than as a separate approval.	from §4.1 and from the CONDITIONAL/FINAL order type in §6.9.2.		
DCI	6.7.6	p. 48, paras 2	te	§6.7.6 already takes a fail-closed position for unknown constraint types ('security-	Add to §6.7.6: 'Where the state required to evaluate a stateful Constraint is unavailable		

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	5.5 8	and 4; p. 35, para 1; p. 54	MAJOR	critical verifiers should treat unrecognised constraint types as failures'). It is silent on the parallel case for stateful Constraints: the running total or lifecycle state of §5.5 cannot be retrieved at Fulfilment time. For a present Consumer with bounded exposure, availability may reasonably win. For an autonomous Fulfilment against a budget cap it should not, because an outage would otherwise be indistinguishable from a within-bounds evaluation in every downstream record, and no participant could later tell a policy outcome from a service failure. Our own default for unbounded machine-initiated actions is to hold and to record the hold as a distinct outcome; it has made outages measurable and has cost nothing in	at Fulfilment time in autonomous mode, the Fulfilment is not treated as within bounds; the outcome is recorded as UNEVALUABLE, distinct from OUTSIDE_BOUNDS, and the corresponding Agentic Transaction Indicator (§8) carries that distinction so that issuers and merchants can measure outages separately from policy outcomes.' Add the same note to §5.5.		

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DCI	5.6 5.1 6.9.2 6.7.3	p. 35, last para; p. 32; p. 49; p. 47, last para	te MAJOR	disputes. §5.6 says completed orders 'may be materialised as Autonomous Fulfilment artefacts, enabling verification, audit, and cross-party consistency', and §5.1 and §5.3 make post-transaction support (disputes, audit, reconciliation) a primary function, but the artefact's minimum content and who signs it are undefined. A log entry held by the party that made the decision is weak evidence in a dispute. Two properties deserve separate sentences in the text. A signature proves the artefact was not altered afterwards. Re-derivation, re-running the recorded values through the recorded Constraints and obtaining the same outcome, proves the outcome was the one the Constraints	Define in §5.6, and mirror in §6.9.2, the minimum content of an Autonomous Fulfilment artefact: Intent and order references; identifiers and version of the Constraints evaluated; the final values evaluated; the state position (§5.5) used; the outcome (within bounds, outside bounds, held, unevaluable); any Consumer consent used to resolve a held order and its signer; a timestamp inside the signed envelope. State that the artefact is signed by the evaluating party with a key resolvable through a published JWKS endpoint with a rotation grace window, as §6.7.3 already assumes for Layer 1, so that a merchant, issuer or auditor can verify it without contacting the evaluator; and state its evidential standing in		

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				required. A framework that specifies only the first will get artefacts that are tamper-evident and still wrong. We publish a corpus of such records, including the negative cases a verifier must refuse, so that this distinction can be checked rather than argued (DOI 10.5281/zenodo.22312956; verifier '@decionis/verify' on npm).	post-transaction support (§5.1).		
DCI	5.5 4.3.3 6.3.2 6.7.6	p. 34–35 (p. 35, para 1); p. 28–29; p. 42, last para; p. 48, para 4	te MAJOR	A budget cap is a shared mutable resource. If two Fulfilments under the same Mandate Pair are evaluated concurrently against the same running total, both fit, and the Consumer authorised neither outcome. §5.5 names cumulative_spend and occurrence_count and mentions nonces and freshness, but does not say that consumption must be	In §5.5: (a) state that consumption of a budget amount or a recurrence occurrence is atomic and single use per order, so that a second evaluation against the same state position fails rather than succeeds; (b) state that a Fulfilment evaluation references the state position it used (for example a monotonic state version) and that this reference is carried in the Fulfilment artefact		

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				atomic, nor which state position an evaluation refers to. It also says coordination of state between Intent Service Providers 'should be managed by the Agent', the one participant whose actions the state exists to bound, which conflicts with §5.1 (the Intent Service maintains lifecycle state 'supporting stateful constraint evaluation') and §6.7.6 and §6.3.2 (the payment system maintains the running total). The correctness criterion we apply in production is policy-state serialisability (Peng and Wu, 2026): each committed Fulfilment remains explainable against a state consistent with the Fulfilments ordered before it. Our implementation claims the nonce and the affected scope atomically at commit;	(§5.6); (c) replace 'should be managed by the Agent' with a statement that stateful Constraint state is held by a participant other than the Agent, the Payment System per §6.7.6 or the Intent Service Provider per §5.1, and reconcile §2.5, §5.1, §6.3.2 and §6.7.6 on which.		

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				unrelated scopes stay independent, so throughput is not traded for correctness.			
DCI	8 8.1 8.2	p. 54, para 2; p. 55	te MINOR	The indicators discussed in §8 communicate 'the presence of agent involvement'. Presence is useful for reporting; it does not let a receiving participant act. A reference to the Fulfilment artefact (§5.6), meaning the Intent reference, the order reference, the artefact identifier and the locator of the signing key set, turns the indicator into something an issuer can decline on when it cannot verify the artefact, a merchant can attach to a dispute response, and post-transaction processes can resolve to exactly what was evaluated. Such a reference is small enough to fit the message families listed in §8.2.	Add to §8 a note that future indicator designs should reserve an optional reference to the Fulfilment artefact (Intent reference, order reference, artefact identifier, key-set locator) in addition to the presence flag, and that the indicator should distinguish agent present and within bounds, outside bounds, held, and unevaluable (see the comment on §6.7.6). Format to be specified later.		

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DCI	3 5.2	p. 21, para 4; p. 33, bullet 2	te MINOR	We support the separation in §3 between interoperable identification and 'implementation-specific trust and decisioning models'. One consequence is worth stating explicitly, because it is the most common confusion we see in deployments: a valid agent identifier, attestation or registry entry is evidence about who is acting, not evidence that this Fulfilment is within the Consumer's Intent. That evidence is the Fulfilment evaluation against the Constraints (§4.3.5, §6.7.6) and its artefact (§5.6). Keeping the two as separate layers with separate evidence, an agent identity assertion and a Fulfilment artefact that references it, prevents a valid credential from being read as authorisation of the action.	Add to §3 after 'This framework intentionally separates...': 'KYA information identifies and attributes an agent; it does not establish that a specific Fulfilment is within the Consumer's Intent. That determination is the Fulfilment evaluation (§4.3.5) and its artefact (§5.6), which should reference the agent identifier used (§5.2).'		

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DCI	1.2.2 1.2.1	p. 11, last bullet; p. 10, last bullet	ge	§1.2.2 places 'any definitions of when or how Intent is approved, rejected or acted upon' out of scope, while §1.2.1 keeps 'shared lifecycle and state concepts' in scope, §5.4 lists APPROVED and FAILED categories, and §6.7.6 says the payment system 'rejects any Fulfilments that would push the cumulative total over the cap'. Read literally, the exclusion also removes the outcome vocabulary needed for the framework's stated goal of consistent interpretation across participants. The useful line is between decision logic, whose thresholds and which party, rightly out of scope, and the semantics of an outcome and how it is recorded, which must be shared or every participant will interpret the same Fulfilment differently.	Reword the bullet: 'Authorisation decisioning logic, risk thresholds, conformance programs and payment system requirements. The framework does define the shared semantics of Fulfilment outcomes and their recording, as lifecycle and state concepts, without defining how any participant reaches them.'		

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DCI	2 2.5	p. 17–18; p. 18, last sentence of 2.5	te MINOR	§2 does not name the function that evaluates a Fulfilment against the Payment Mandate and its Constraints. §2.5 says the Intent Service Provider does not make authorisation decisions, §4.3.5 says 'different participants may apply their own decisioning logic', and §6.7.6 assigns the running total to the payment system. Whichever participant performs it, one property matters to interoperability: the evaluating function must not be performed by the Agent, and its evidence must be verifiable by participants that did not perform it. Naming the function, not a new entity, would let later specifications attach requirements to it and would make Figure 1 and steps 8 to 10 of Figure 2 explicit about where evaluation happens.	Add to §2 a responsibility 'Fulfilment evaluation': evaluating final values against the Payment Mandate, Constraints and Bindings at Fulfilment time and producing the Fulfilment artefact; performed by the Payment System, the Payment Credential Provider, or a participant they designate; never by the Agent. Reference it from §4.3.5 and §6.7.6.		

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DCI	6.10.1 6.10.2	p. 50, Fig. 3; p. 52, Fig. 5 (ISP lane)	te MINOR	Figures 3 and 5 place 'Validate + execute payment', 'Validate L2 + L3' and 'Execute payment' in the Intent Service Provider lane. §2.5 states the Intent Service Provider does not 'make payment authorisation decisions', §5 that Intent Services 'are not execution engines, authorisation systems, or enforcement mechanisms', and §5.7 that the Intent service 'is not necessarily expected to act or interpret the Intent data'. Either the figures or the role text is wrong, and readers building to the figures will put evaluation inside the registry the text says must not evaluate.	Add a Payment System lane to Figures 3 and 5, or relabel the lane 'Intent Service Provider / Payment System', and move the validate and execute steps into it, leaving 'Register intent', 'Store intent' and 'Retrieve intent' with the Intent Service Provider. Align with the resolution of the role comment on §2.		
DCI	5.4 5.5	p. 34, list; p. 35, para 1	ed	The Intent-level lifecycle list on p. 34 contains an empty bullet between PARTIALLY_COMPLETED and	Remove the empty bullet or insert the intended category (if it was a held or pending-Consumer state, see the comment		

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				REVOKED. On p. 35 'Providermay' is missing a space.	on §5.4). Correct 'Providermay' to 'Provider may'.		
DCI	6 (Note to Reviewers) 5.9	p. 38, note; p. 36–37	ge	The Note to Reviewers routes structural feedback on Verifiable Intent to the repository maintained by FIDO and limits feedback here to whether §6 represents VI accurately within the framework. Several of the semantics proposed above (outcome categories, state position, the content of a Fulfilment artefact) would need a place in a VI mandate or Layer 3 credential to be carried end to end. It is not clear from the draft which body owns such a change when the framework's own semantics require it, nor whether the framework will describe these semantics independently of VI so that a non-VI Intent mechanism can conform.	State in §6 or §5.9 that the framework's payment-layer semantics, including any outcome, state-position and Fulfilment-artefact semantics adopted from this review, are defined independently of VI, and describe the process by which a framework-required semantic is carried into VI's mandate schemas.		

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