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Apple Pay Case Study

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Market-Driven Development

- Research and groundwork
- Trends and trajectories leveraged, and those that create headwinds
- Optics

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Apple Pay in the Payments Supply Chain

- Specialization and value-add
- Demographics, fraud/security, and EMV
- Succeeding where others have not?



 Tokenization – What is it? How does it work? What parties are involved?

• NFC – What is it? How does it work?



Legal Ramifications of Apple Pay?

- Is Apple Pay a financial institution?
- Is Apple Pay a service provider? (regardless of public position, does its activities come within the definitions of FI or service provider?)
- If so, potential regulatory scrutiny by CFPB? FinCEN? The payment networks? State AGs?



Apple Pay...

 Does the reported Apple Pay fraud impact change the analysis?

Other considerations?

What about the future if fraud continues?



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 Durbin Amendment/Regulation II – Does Apple Pay comply?

