

## File Layout Guidelines

### Merchant Acquirers Submit Information by November 12, 2025 Payment Intermediaries Submit Information by February 25, 2026

#### 1. Purpose

A proposed class action settlement has been reached in lawsuits alleging that, beginning in 2007, Discover misclassified certain Discover-issued consumer credit cards as commercial credit cards, which in turn caused merchants and others to incur excessive interchange fees. Your organization has been identified as a “Merchant Acquirer”<sup>1</sup> or “Payment Intermediary”<sup>2</sup> under the terms of the settlement.

To participate in and administer the settlement, your organization is being asked to provide information about businesses for which you processed Discover-issued credit cards. These businesses are referred to in the settlement as “Downstream Entities.”<sup>3</sup> Information about your Downstream Entities is needed to notify those businesses about the proposed class action settlement and to calculate settlement payments for eligible businesses.

To participate in the settlement, you must provide certain information reflected in the data fields below for each Downstream Entity associated with each Discover MID linked to your organization from January 1, 2007 through December 31, 2023 (the “Relevant Period”). A list of Discover MIDs linked to your organization is available at [www.DiscoverMerchantSettlement.com](http://www.DiscoverMerchantSettlement.com) using the Claimant ID and PIN listed in your notice mailing or email. This list represents Discover MIDs that could be connected to your organization and processed one or more misclassified Discover Card transactions during the Relevant Period. This list may not include all of your organization’s Discover MIDs and may be updated as additional data is received.

For purposes of this request, the terms “you” and “your organization” includes any divisions or subsidiaries that are owned or operated by you and your predecessors, including any businesses that were acquired by you or your subsidiaries.

#### 2. Data Requirements

**Please provide the information in “Table 1 – Template Field Layout” below. Fields required to make accurate and complete payments are marked in bold and with an asterisk (\*).** A .csv template file is available at [www.DiscoverMerchantSettlement.com/DataInfo](http://www.DiscoverMerchantSettlement.com/DataInfo). The fields defined in Table 1 correspond to the column headers in the .csv template sample supplied to illustrate the desired data layout. **Your data file(s) should be provided in a tab delimited or pipe delimited ASCII file format.**

Each row of data you provide should represent a distinct Downstream Entity for a given Discover MID. If there is more than one Downstream Entity for a Discover MID, use a unique row of data for each Downstream Entity per the guidance in Table 1.

Please compile the requested information from any databases or reporting repositories that you currently use in the ordinary course of your business that contain the most relevant information.

If you do not maintain data in a manner that will enable you to compile the data in the file format below, please contact the dedicated Direct Services team to assist by phone at 1-877-535-8067, 9:00 a.m. - 6:00 p.m. ET, Monday-Friday (except holidays), or by email at [DirectServices@DiscoverMerchantSettlement.com](mailto:DirectServices@DiscoverMerchantSettlement.com) (3-5 business days response time).

#### 3. Submission Process

Once your data is compiled, you must submit it to the Settlement Administrator along with the required supporting Data Questionnaire attached to this document and available at [www.DiscoverMerchantSettlement.com/DataInfo](http://www.DiscoverMerchantSettlement.com/DataInfo).

<sup>1</sup> “Merchant Acquirer” is defined at Section 2.30 of the Settlement Agreement.

<sup>2</sup> “Payment Intermediary” is defined at Section 2.52 of the Settlement Agreement.

<sup>3</sup> “Downstream Entities” is defined at Section 2.18 of the Settlement Agreement.

Data should be securely transmitted to the Settlement Administrator using one of these methods:

- a. Upload your information online using the credentials at the top of the first page of these instructions at [www.DiscoverMerchantSettlement.com](http://www.DiscoverMerchantSettlement.com); or
- b. Request that the Settlement Administrator email you a link to its SFTP system to upload your information; or
- c. Request that the Settlement Administrator follow your preferred procedures for transmitting information to third parties, whether through your own SFTP or otherwise.

#### **4. Review**

Once your data is submitted, the Settlement Administrator will review it for completeness, accessibility, and compatibility with the Settlement Administrator's system requirements. The Settlement Administrator may contact you for clarification and/or to request additional information.

The Settlement Administrator may compare the information you provide to publicly available sources such as the Nilson Report for validation purposes. Additional details regarding the quality checks and resolution approach can be found at: [www.DiscoverMerchantSettlement.com/DataInfo](http://www.DiscoverMerchantSettlement.com/DataInfo).

The Settlement Administrator has developed a quality control (QC) tool to assist you in identifying issues before you submit your data which will streamline the data review process. The QC tool (QC\_tool.xlsx) is available at [www.DiscoverMerchantSettlement.com/DataInfo](http://www.DiscoverMerchantSettlement.com/DataInfo).

#### **5. Confidentiality**

Your data will be designated and maintained as confidential and will not be disclosed except as provided for in the settlement or by Court order. The Settlement Administrator may communicate and share information with Discover, Discover's Counsel, and Settlement Class Counsel, as is reasonably necessary to carry out its duties under the settlement. A mutual non-disclosure agreement is available, should your organization require one. Please contact the dedicated Direct Services team to assist you.

**Table 1 – Template Field Layout**

Field Name	Field Type	Field Format or Length	Description
Admin MID*	Text	Numeric; 21 digits	<p>“Admin MID” field is a unique identifier, comprised of the Acquirer ID and Discover MID, and will be used by the Settlement Administrator to connect your response data to the data on its system. The Admin MID is available at <a href="http://www.DiscoverMerchantSettlement.com">www.DiscoverMerchantSettlement.com</a>. After you register using your Claimant ID and PIN, you will have access to the MID list which contains the “Admin MID” field.</p> <p>Please provide the corresponding Admin MID in each row of data associated with a particular Discover MID. If you are adding records for a Discover MID not reflected on your MID list, you may omit this field.</p>
Responding Organization’s Merchant Identifier 1	Text	Numeric; 15 digits	<p>The “Responding Organization’s Merchant Identifier” is the Merchant Identifier you use to identify an entity for whom you processed Discover card transactions from 2007 – 2023.</p> <p>There may be a 1:1 alignment between your Merchant Identifier and a single Discover MID. Alternatively, you may have multiple Merchant Identifiers transacting through a single Discover MID. We need to understand the relationship between you Merchant Identifiers and the Discover MIDs.</p> <p>If you recognize more than one Merchant Identifier for a given Merchant Acquirer or Payment Intermediary because of renumbering (due to acquirer consolidation, business acquisition, business restructuring, etc.) or any other reason, please include this information in a separate field. Please include as many columns as you need to capture all Merchant Identifiers used by you for a given entity.</p> <p>If one of the Merchant Identifiers for an entity is considered the primary identification code, provide this code in the “Responding Organization’s Merchant Identifier 1” field.</p>
Responding Organization’s Merchant Identifier 2	Text	Numeric; 15 digits	See description for “Responding Organization’s Merchant Identifier 1.”

Field Name	Field Type	Field Format or Length	Description
Downstream Entity Identifier 1	Text	Numeric; Alphanumeric	<p>A “Downstream Entity Identifier” is the identification code you use to identify an entity that is “downstream” of the Merchant Identifier and has transactions that aggregate up to a Discover MID.</p> <p>There may be a 1:1 alignment between your Merchant Identifier, the Downstream Entity Identifier, and a single Discover MID. Alternatively, there may be multiple Downstream Entity Merchant Identifiers that transact through your Merchant Identifier and/or a single Discover MID. It is imperative that this relationship is clear in the data being provided.</p> <p>For example, if you issued a Merchant Identifier for ABC Processing Co. and, as part of “Know Your Client” follow up, they have advised your organization that they utilize that Merchant Identifier to process transactions for 10 additional businesses and have provided you with their identification numbers related to those 10 businesses, please provide these identification codes.</p> <p>If you recognize more than one Downstream Entity Identifier for a given Downstream Entity because of renumbering (due to acquirer consolidation, business acquisition, business restructuring, etc.) or any other reason, please include this information in a separate field. Please include as many columns as you need to capture all Downstream Entity Identifiers used by you for a given entity.</p> <p>If one of the Downstream Entity Identifiers for an entity is considered the primary identification code, provide this in the “Downstream Entity Identifiers 1” field.</p>
Downstream Entity Identifier 2	Text	Numeric; Alphanumeric	See description for “Downstream Entity Identifier 1.”
<b>Legal Name*</b>	Text	Alphanumeric; 60 characters	
DBA Name	Text	Alphanumeric; 60 characters	“DBA” Doing Business As.
<b>TIN*</b>	Text	9 characters	US federal “TIN” or Tax Identification Number: FEIN, SSN, or ITIN.
<b>Discover MID*</b>	Text	Numeric; 15 digits	A “MID” or Merchant Identifier code as assigned by Discover. In rare cases, a Discover MID may exceed or fall short of the standard 15 digits and/or contain alphabetic characters. In these instances, your data will still be accepted.
<b>Entity Address Type*</b>	Text	“Legal”, “HQ”, “Bill To”, or “DBA”	Provide the listed address elements for the entity associated with the Merchant Identifier(s) provided. If there are multiple entities associated to the listed Merchant Identifier(s), you must provide a separate row for each entity’s contact information.

Field Name	Field Type	Field Format or Length	Description
Entity Street Address 1*	Text		Identify which address type from the hierarchy list noted below that most closely aligns to your business records as the "Entity Address Type".  <b>General Instructions for address selection:</b> <i>Unless you are a Payment Intermediary or Payment Facilitator (PayFac)</i> , the order of preference should you have multiple addresses in your records would be: (1) legal address, (2) headquarters address (if no legal address), (3) a "bill to" address (if no legal or headquarters address exists), or (4) DBA address (if none of the prior options exist in your business records). Each of the listed fields should come from the same, best address record based on the hierarchy above. If email is stored separately from addresses, you may populate multiple email addresses separated by a semicolon.
Entity Street Address 2	Text		
Entity City*	Text		
Entity State*	Text		
Entity Zip/Postal Code*	Text		
Entity Country*	Text		
Entity Email Address*	Text		
Entity Attention/Contact Person	Text		<b>Payment Intermediary/Payment Facilitator (PayFac) special instructions for address selection:</b> The address information provided should be for the ultimate end merchant, which most commonly will be the DBA address, thus reversing the order of preference to be: (1) DBA address, (2) a "bill to" address (if no DBA address exists), (3) headquarters address (if no DBA or "bill to" address exists, or (4) legal address (if none of the prior options exist in your business records).  <b>NOTE FOR ALL RESPONDING ORGANIZATIONS:</b> If your business records contain addresses associated to Downstream Entity Merchant Identifiers, please provide those as additional records in the data output with the associated names.
Entity Phone Number	Text	Numeric; 9-digit	
Is Payment Intermediary and/or Payment Facilitator?	Yes/No	"YES", "NO", or "UNKNOWN"	If yes, you are indicating awareness that the entity associated with this Merchant Identifier has further assigned use of the Merchant Identifier to one or more downstream businesses who processed Discover Card transactions through this Merchant Identifier between 2007-2023.
Is End Merchant or merchant of record?	Yes/No	"YES", "NO", or "UNKNOWN"	If yes, your business records reflect the entity is the merchant of record who accepted the Discover Cards being presented and there are no additional entities downstream of the listed entity.
Is Franchisor?	Yes/No	"YES", "NO", or "UNKNOWN"	If yes, your business records indicate this entity is a franchisor.
Is Franchisee?	Yes/No	"YES", "NO", or "UNKNOWN"	If yes, your business records indicate this entity is a franchisee.
Chain Identifier	Text	Numeric; Alphanumeric	If this is a chained entity, provide the chain identifier from your business records.
Open Date of Merchant Account*	Date	YYYYMMDD	If unknown, "19000101".
Close Date of Merchant Account*	Date	YYYYMMDD	If closed, but the closure date is unknown, "19000101". If still open "21000101".
Last Processed Transaction Date*	Date	YYYYMMDD	If none or unknown, "19000101".

Field Name	Field Type	Field Format or Length	Description
<b>[YYYY] Bundled Pricing Agreement?*</b>	Yes/No	"YES" or "NO"	<p>Indicate whether your organization had a "bundled" pricing agreement, whereby Discover fees were paid wholly by your organization and not passed on to, or paid by, the Downstream Entity.</p> <p><i>"[YYYY]" reflects the given year of provided data. For example, "[2007] Bundled Pricing Agreement?" for the year 2007.</i></p> <p><b>PLEASE NOTE:</b> You must provide a column of data or equivalent information for each year your organization is claiming and/or providing data for in order for the Settlement Administrator to properly allocate the MID restitution.</p>
<b>[YYYY] Pct of Discover Fees Paid by Responding Organization*</b>	Decimal	Limit to three decimal places. For example, "1.000" for 100.0% or "0.655" for 65.5%.	<p>Provide the estimated percent or portion of Discover fees paid individually by your organization, as opposed to the Downstream Entity.<sup>1,2,3,4</sup></p> <p><b>PLEASE NOTE:</b> You must provide a column of data or equivalent information for each year your organization is claiming where you have indicated "Bundled Pricing Agreement = No" and/or you are providing data for in order for the Settlement Administrator to properly allocate the MID restitution.</p>
<b>[YYYY] Pct of Discover Fees Paid by Entity*</b>	Decimal	Limit to three decimal places. For example, "1.000" for 100.0% or "0.655" for 65.5%.	<p>Provide the estimated percent or portion of Discover fees passed on to, or paid by, the Downstream Entity.<sup>1,2,3,4</sup></p> <p><b>PLEASE NOTE:</b> You must provide a column of data or equivalent information for each year your organization is claiming where you have indicated "Bundled Pricing Agreement = No" and/or providing data for in order for the Settlement Administrator to properly allocate the MID restitution.</p>

\*Annual allocation information must be provided for each year from 2007 to 2023. Failure to provide either "Bundled Pricing Agreement" or both "Pct of Discover Fees Paid by Responding Organization" **and** "Pct of Discover Fees Paid by Downstream Entity" fields may result in 100% of associated settlement payments being paid to Downstream Entities. When populating these allocation fields, you should use reasonable efforts to identify and report all available information. If your data is limited, including for prior years, you may extrapolate your data back to the open date for each MID.

1. In making its final allocation decisions, the Settlement Administrator reserves the right to request additional information related to your organization's pricing and/or payment agreements with End Merchants or other Downstream Entities.
2. If you are unsure about whether you offered bundled pricing or how to calculate "[YYYY] Pct of Discover Fees Paid by Downstream Entity" and "[YYYY] Pct of Discover Fees Paid by Responding Organization", please provide data or documentation showing your Downstream Entities' pricing arrangements(s) with you and the years in which such arrangements were in effect or that otherwise demonstrate that interchange fees caused by Misclassified Card Transactions were or were not passed on to Downstream Entities.
3. To determine "[YYYY] Pct of Discover Fees Paid by Downstream Entity" and "[YYYY] Pct of Discover Fees Paid by Responding Organization" for a given MID, fee pricing agreements may be considered. For example, if your organization has a "bundled" pricing agreement for a given year, this may mean that Discover's fees by card type (e.g., commercial, rewards, premium, or premium plus) were paid by your organization and were not passed through to the entity with whom you contracted. Therefore, a "bundled" pricing relationship might mean your organization paid 100% of Discover fees for that year. Alternatively, if your organization did not have a "bundled" pricing agreement for a given year, then your organization likely did not pay 100% of Discover fees for that year.

4. For cases in which a given MID has one direct Downstream Entity (e.g., a Payment Intermediary or End Merchant) and a pricing agreement change in a given year [YYYY], Discover Commercial Card transaction volumes and/or relative timing can be considered to determine “[YYYY] Pct of Discover Fees Paid by Downstream Entity” and “[YYYY] Pct of Discover Fees Paid by Responding Organization.”
5. For cases in which a given MID has multiple Downstream Entities below the MID level, relative Discover Commercial Card transaction volumes for each Downstream Entity may be considered to determine “[YYYY] Pct of Discover Fees Paid by Downstream Entity” and “[YYYY] Pct of Discover Fees Paid by Responding Organization.” Additional guidance for populating these fields in cases with multiple Downstream Entities below the MID level can be found at [www.DiscoverMerchantSettlement.com/DataInfo](http://www.DiscoverMerchantSettlement.com/DataInfo).

### Data Questionnaire

**Please fill out the following information to assist the Settlement Administrator in processing your organization’s data.**

Name of organization providing data.	
Address of organization providing data.	
Organization contact for questions about data: Name and Title	
Organization contact for questions about data: Telephone number	
Organization contact for questions about data: Email	
Any software and/or programming language (e.g., Python) by which data is being produced, and any other information necessary for the Settlement Administrator to access your data file(s) (e.g., encryption passwords).	
For each distinct data file, the respective file name and the number of rows in each respective file.	
For all data file(s) together, the sum total number of all rows of data produced (i.e., control totals for the Settlement Administrator to validate all rows of all files have been received).	
The name(s) of each document provided. Documents should include: field mapping, code label sets, metadata and pricing documentation, as well as information needed by the Settlement Administrator to upload, process, analyze and understand the data file(s) provided by your organization.	

Date: \_\_\_\_\_

Print Name: \_\_\_\_\_

Location: \_\_\_\_\_

Position: \_\_\_\_\_