



	<i>NON-PROCESSING ACQUIRER</i>	<i>PROCESSING ACQUIRER</i>
Pulse®	Must Submit TR-39.	Must Submit TR-39. Must have a CTGA complete the review.
STAR®	No submission required but must comply with STAR security requirements for PIN and Key management and periodic review recommended to ensure compliance.	Must Submit TR-39 by end of year. Must have a CTGA complete the review.
NYCE®	No submission required but must comply with NYCE security requirements for PIN and Key management and periodic review recommended to ensure compliance.	Must Submit TR-39 by end of year. Must validate experience of person completing the review.
CO-OP®	Must submit PIN Security self audit document. TR-39 accepted in lieu of CO-OP forms.	Must submit PIN Security self audit document. TR-39 accepted in lieu of CO-OP forms.
Accel/Exchange®	No TR-39 Required	No TR-39 Required
VISA®	Must warrant required safeguards as specified in VISA PIN Management Requirements Documents.	Must submit VISA PCI PIN Debit Self-Audit 2008 Version 2.0 review forms. Must certify qualifications of person completing documents.