# 牌照是什么，不是什么

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数字支付代币牌照并不是《2019年支付服务法》下一个单独的牌照类别。它是一张标准支付机构或主要支付机构牌照，其范围包括数字支付代币服务，也可能同时包括其他支付服务。将客户的新加坡元兑换为代币并将代币发送至境外的企业，通常持有涵盖DPT服务和跨境转账的牌照。发行新加坡元稳定币并经营交易所的企业，则会将电子货币发行与DPT服务结合起来。[1]实际要点在于，申请是逐项服务进行评估的。日后增加服务需要提出变更申请，而变更申请要经过大致相同的审查，因此应结合三年业务计划来界定牌照范围。

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# 注释

1. PSA， s. 6(2)及First Schedule， Part 1：牌照载明持牌人可提供的支付服务，持牌人在增加服务前必须申请变更牌照。↩
2. PSA， ss 27（对持牌人的控制：20%控制人须经批准）及37（首席执行官、董事和合伙人的批准）。↩

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