



White Paper

Navigating the growing complexity of enterprise dispute management

Unlock a strategic advantage with an enterprise-wide function

Dispute management is at a crossroads. Many financial institutions still manage disputes using legacy systems that operate in silos, organizing operations by payment rail rather than by the dispute itself. Card, ACH, Zelle™, wire, bill pay and check disputes are often handled by separate teams, systems and processes – which may have their own workflows, compliance requirements, and operational overhead.

While this model worked in the past, growing transaction volumes, regulatory demands and payment options are making rail-specific dispute management increasingly complex, costly and difficult to scale.

The numbers make the pressure hard to ignore. Chargeback volumes continue to rise globally, creating increased operational demands for financial institutions and adding complexity to dispute management processes.

At the same time, handling disputes remains a resource-intensive and costly endeavor. Financial institutions must invest significant time, personnel, and operational resources to manage increasing dispute volumes while maintaining service levels and compliance requirements.

As dispute activity grows, many organizations are facing mounting pressure to improve efficiency, reduce manual workloads, and better address the evolving drivers of chargebacks and first-party fraud.

Beyond measuring operational performance, these trends reveal a broader strategic reality: the traditional dispute management model was not designed to scale effectively in today's environment.

This white paper advocates for a fundamental shift in dispute management, moving away from siloed, rail-specific processes toward a unified enterprise-wide capability. Rather than organizing operations around payment types, it promotes a case-centric approach that can streamline workflows, improve consistency and enhance operational efficiency across the entire dispute lifecycle.

Fragmented operations, specialist-dependent

The siloed structure of dispute operations didn't emerge from bad strategy. It emerged from a payment ecosystem that grew incrementally, with each new rail bringing its own regulatory requirements, network rules and operational conventions. Teams adapted. Solutions were bolted on. Expertise was built rail by rail.

The result is a dispute function that often looks like this: card chargebacks managed through one system; deposit disputes processed through a separate workflow; Zelle™ and P2P disputes handled by a different team with different documentation requirements; and wire disputes escalated through yet another escalation path. Each stream may have its own compliance cadence, deadlines and dependency on staff with expertise in one specific dispute area only.

Staff dependency can create a real vulnerability. When a disputes expert leaves, their institutional knowledge may leave with them. When volumes spike, there may not be a clear way to flex capacity across rails. And when a cardholder files a dispute that crosses channels or payment types, the institutional response can feel inconsistent – because it is.

The operational costs are visible. The strategic costs are harder to quantify but also real: slower resolution, higher write-off rates, audit exposure and a cardholder experience that may vary based on payment rails.



Friendly fraud in the dispute queue

Not every dispute represents a cardholder who was genuinely wronged. A growing proportion represents first-party fraud: cardholders who received a product or service but dispute the transaction anyway, intentionally or due to genuine confusion about what they authorized.

Fraudulent chargebacks, including both first-party and third-party fraud, represent a growing challenge for financial institutions. One reason first-party fraud can be more difficult to manage than traditional fraud is that it enters the system through legitimate dispute channels. A cardholder calls or submits a dispute through a digital portal, claims non-receipt or unauthorized use, and the case proceeds through a workflow designed to protect consumers. The burden of proof generally rests with the institution, and the timeline for gathering evidence and reaching a resolution is often short.

Fragmented dispute operations can compound the challenge. Without a unified view of cardholder activity across rails and claims, suspicious patterns can go undetected, including multiple disputes within a short period, clusters involving high-value merchant categories, and activity linked to previous claims. Each rail typically reviews its cases in isolation, preventing the full picture from emerging.

This is where operational fragmentation becomes a direct financial risk. A centralized dispute platform that manages different transaction types in a single environment doesn't just reduce processing cost. It can create the data foundation needed to identify and act on first-party fraud patterns before they compound.

Every dispute puts customer trust to the test

Disputes are among the highest-stakes interactions a financial institution has with its customers. A cardholder who calls in to report an unrecognized charge or suspected fraud isn't just resolving a transaction – they're evaluating their bank.

Effectively responding to these types of customer concerns reinforces trust in your institution. A poor response creates attrition risk when the customer is paying the most attention.

The experience gap in dispute management is wider than it looks from the inside. Cardholders expect the same speed and clarity in dispute resolution that they experience in other parts of their digital lives. When a dispute takes days to be acknowledged, requires a cardholder to repeat information across multiple contacts, or results in a resolution that conflicts with what they were initially told, that expectation is likely not being met.

Consistency across every payment type and every dispute channel is paramount to the customer experience. The moment a customer files a dispute, you have a narrow window to demonstrate competence and care. A fragmented operation, with inconsistent workflows and variable response times, closes that window faster than most institutions may realize.



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Rail-specific compliance risks

Every payment rail carries its own regulatory and network compliance obligations. Card disputes must follow Visa and Mastercard network rules, with precise deadlines for chargeback filing, representment and arbitration. ACH and many deposit account disputes fall under Regulation E and the Electronic Fund Transfer Act, with their own investigation timelines, provisional credit requirements and consumer notification standards. Wire disputes and P2P transactions such as Zelle™ introduce additional complexity, with liability frameworks that vary based on authorization status and consumer notification.

Effectively managing compliance across all payment rails simultaneously is demanding, and doing so with separate teams and solutions is onerous. The failure modes are predictable: missed chargeback deadlines; incorrect documentation; and provisional credits not issued when they should have been. A failure could be a potential audit finding, regulatory exposure or a lost recovery.

These risks are related to issues with an institution's infrastructure – in addition to operations – because the rules continually evolve. Card networks revise dispute reason codes and resolution timelines. Regulatory guidance changes. New payment types introduce compliance requirements before institutions may have developed the necessary expertise. Teams managing compliance manually through rail-specific workflows must work to keep pace.

An enterprise-wide dispute platform changes that posture. When compliance logic is embedded directly into the workflow and can update as rules change, the institution doesn't need to only rely on specialists to stay current. The system supports that burden, and the risk surface can be reduced.

Adding headcount isn't necessarily the answer

The traditional response to rising dispute volumes is often to add staff. More volume, more investigators. More rails, more specialists.

Staffing chargeback expertise can be slow to develop. It generally requires finding people who understand not just the technical process but also the network rules, the regulatory requirements and the documentation standards for each rail. Training can take months. Turnover can be costly. And as dispute complexity grows, the baseline expertise required keeps rising.

A staffing model likely treats dispute management as a variable cost that scales with volume. A more modern approach is to treat dispute management operations like other enterprise functions: with automation handling structured, rules-driven work, and human expertise generally reserved for cases that genuinely require judgment.

The math matters here. If one FTE supports \$13,000 to \$14,000 in annual cardholder disputes, and global dispute volumes are growing by tens of millions of transactions over the next three years, the staffing cost trajectory may be unsustainable for institutions that rely primarily on headcount to absorb that growth.

Technology can change the ratio. Guided workflows that work to automate intake validation, deadline tracking, reason code selection and documentation management can free investigators to focus on complex cases, not administrative process. That's where an efficiency opportunity lives, and it can become available with technology that can work across all payment rails.



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Agentic commerce introduces new dispute risks

The dispute landscape is poised to become even more complex. Agentic commerce, where AI systems work to initiate, manage and complete purchases autonomously on behalf of consumers, is moving from early adoption toward mainstream use. With it comes a new category of disputes that existing frameworks aren't fully prepared to handle.

The core challenge is authorization ambiguity. A consumer instructs an AI agent to book a flight under a set of parameters. The agent books a flight. The consumer disputes the charge because the result didn't match their expectations. Who authorized the transaction? Was it the consumer or the agent? Was the agent's action within the scope of the original instruction?

Fenwick, the law firm that advises on fintech and AI, noted in a 2026 analysis that "the lack of a clear framework for handling disputes in agentic commerce and payments means that consumers could be left without standard dispute rights when contesting agentic purchases, regardless of where the error occurred." Regulation E's authorization requirements were likely built around human-decided transactions. How they apply when an AI agent acts with delegated authority is, as Fenwick observed, currently unresolved.

For financial institutions, this can create two types of operational exposure. First, agentic commerce disputes will likely arrive at higher volumes and with less clear documentation than traditional disputes. Second, the liability framework for determining whether a disputed agentic transaction was authorized or unauthorized is still being defined by regulators, networks and courts.

For institutions, the implication may be direct. Agentic commerce disputes will be onerous to solve by adding investigators or extending existing card dispute workflows. They'll benefit from a platform built to handle novel dispute scenarios at scale, with the flexibility to adapt as regulatory clarity develops. That platform should be in place before the volume arrives, not after.

A new operating model centered on the case

The structural shift financial institutions need isn't necessarily incremental. It could be a reorientation of how dispute management is organized.

The current model generally organizes around the rail: card disputes here, deposit disputes there, P2P and wire elsewhere. The new model generally organizes around the case. Regardless of which payment type triggered the dispute, the case should enter a single environment, follow a guided workflow calibrated to the applicable regulatory and network requirements, surface the relevant cardholder history and move through resolution with consistent documentation and tracking.

This isn't just an efficiency argument, although the efficiency gains can be real. It's a compliance argument: a centralized case management environment should make it easier to apply consistent standards, retain documentation, meet deadlines and support audit readiness across rails. It's also a fraud detection argument: a unified view of cardholder dispute history across payment types is likely more effective at surfacing first-party fraud patterns than rail-specific systems that never share data. And it's a customer experience argument: when the investigation process is consistent and the resolution timeline is predictable, the cardholder experience can improve regardless of which transaction triggered the dispute.

For operations leaders, this model can reduce the staffing pressure created by rail-specific expertise requirements. For compliance teams, it may reduce the manual burden of tracking rule changes across multiple regulatory and network frameworks. For payments product owners, it may provide the visibility into dispute trends and root causes that's needed to make informed decisions about product design and cardholder communications.



CBK SaaS: Enterprise dispute management for today

FIS® CBK™ SaaS is a cloud-based dispute and chargeback case management platform designed to centralize the full dispute lifecycle across card and non-card transaction types, including ACH, Zelle™, P2P, bill pay and wire, in a single, scalable environment.

The solution is receiving industry accolades. In June 2025, Juniper Research ranked FIS as the No. 1 provider on its Chargeback Management Competitor Leaderboard, which evaluated the top 15 chargeback management platforms globally. Nick Maynard, VP of Fintech Market Research at Juniper Research, described FIS as "a standout all-rounder in the industry, given its extensive coverage across chargeback lifecycles and robust merchant relationships," and highlighted FIS' "innovative mix of managed services and SaaS solutions" as providing "the flexibility and breadth to help address fraud proactively, make operations more streamlined and manage disputes more efficiently."

CBK SaaS is built on the following principles:

Centralization across rails. A single platform manages card disputes, ACH and deposit disputes, P2P and Zelle™ disputes, wire disputes and bill pay disputes. Teams work in one interface rather than coordinating across separate systems. Cardholder history can be visible across transaction types, enabling faster investigation and better fraud pattern detection.

Guided, rules-driven workflows. The platform works to automate intake validation, deadline tracking, reason code selection, documentation management and next-best-action prompts throughout the dispute lifecycle. Investigators focus on judgment-intensive work; the system implements structured process.

Embedded compliance. Network rules and regulatory requirements are built directly into the workflow logic and updated on an ongoing basis, so institutions don't have to manage compliance manually alone or only rely on specialists to track rule changes across every rail.

Real-time reporting and analytics. Portfolio-level visibility into dispute volumes, resolution rates, recovery performance and root causes enables better operational and strategic decisions. When dispute trends point to a product design issue or a merchant pattern, that signal is more easily visible rather than buried in rail-specific queues.

SaaS scalability. As dispute volumes grow, including the volumes that agentic commerce are expected to introduce, the platform helps scale without requiring additional infrastructure investment. The operational cost curve may not rise proportionally with volume.



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Turn dispute management into a strategic advantage

Dispute management has been reduced to a cost center for far too long. The institutions treating dispute management as a strategic capability may find that the same operational investment that lowers cost per dispute can also improve cardholder retention, strengthen audit readiness and build the data foundation to adapt as payments evolve.

Dispute volumes are rising, fraud patterns are shifting, and agentic commerce is introducing claim scenarios that existing workflows weren't built to handle. At the same time, regulatory frameworks may be evolving faster than manual, rail-specific processes can keep pace with.

The time to build the capability isn't when the volume arrives. It's now – while design decisions can be made deliberately rather than reactively. Dispute management should be reimagined as an enterprise-wide function. That means centralizing operations across all payment types, embedding compliance, automating structured workflows and building visibility across the full dispute portfolio. This foundation will help make everything else possible: faster resolution, stronger fraud detection, more defensible compliance and a customer experience that holds up when it's tested.

CBK SaaS is built to be that foundation. Learn how FIS can help your institution modernize its dispute operations.

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