The Banking Law Journal

Established 1889

125th Anniversary
1889-2014

An A.S. Pratt™ PUBLICATION

NOVEMBER/DECEMBER 2014

LexisNexis

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ISBN: 978-0-7698-7878-2 (print)
ISBN: 978-0-7698-8020-4 (eBook)

Cite this publication as:

The Banking Law Journal (LexisNexis A.S. Pratt)

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An A.S. Pratt™ Publication

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MATTHEW BENDER

(2014–Pub.4815)

Editor-in-Chief & Board of Editors

The Banking Law Journal (ISBN 978-0-76987-878-2) (USPS 003-160) is published ten times a year by Matthew Bender & Company, Inc. Periodicals Postage Paid at Washington, D.C., and at additional mailing offices.

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POSTMASTER: Send address changes to THE BANKING LAW JOURNAL LexisNexis Matthew Bender, 630 Central Avenue, New Providence, NJ 07974.

POSTMASTER: Send address changes to THE BANKING LAW JOURNAL, A.S. Pratt & Sons, 805 Fifteenth Street, NW., Third Floor, Washington, DC 20005-2207.

The New Regulatory Frontier: Building Consumer Demand for Digital Financial Services—Part I

Ross P. Buckley and Louise Malady*

Digital financial services ("DFS") are held out as key financial solutions for improving financial inclusion. However, targeted end-users often offer little in the way of obvious profitable opportunities and so market forces alone are not enough to ensure the supply of services and products which match end-users' means, needs or wants. As a result DFS in emerging markets may suffer from limited uptake and usage, with consequently little effect on financial inclusion. In emerging markets, financial regulators have been focusing on supporting the success of DFS largely through institutional and regulatory framework efforts. This two-part article argues that financial regulators must first work to understand and build consumer demand for DFS rather than purely focusing on developing enabling regulatory frameworks. This requires a change in mind-set for financial regulators who are more familiar with promoting financial stability, safety and efficiency. The authors explore this changing role for financial regulators and recommend that regulators particularly focus on building consumer demand through promoting partnerships in DFS as a means of promoting financial inclusion. In addition, the authors highlight that partnerships introduce collaboration risks and heighten consumer risks; requiring regulators to adjust regulatory frameworks to ensure such risks are identified and mitigated. Part I of this article provides an introduction to the topic, regulatory background, and a section on understanding consumer demand. Part II, which will appear in an upcoming issue of The Banking Law Journal, *discusses building consumer demand and the authors' conclusions.*

Financial inclusion is considered an important means for alleviating poverty and promoting a country's broader economic development; it is therefore now receiving greater attention from international financial regulators. This heightened importance of financial inclusion for economic development is seeing a

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change in the role of financial regulators. Historically banks have innovated in pursuit of higher profits and the role of a financial regulator has been to maintain the safety and soundness of the financial system. However, promoting financial inclusion requires promoting the provision of financial services by banks and new players to customers who may offer little in the way of profitable opportunities. In this environment, market forces alone cannot be expected to deliver the products to match end-users' needs and wants. In promoting financial inclusion, financial regulators must work to minimize the gap between what market forces provide and what end-users need, can afford and want.

This responsibility to promote financial inclusion is a relatively new and different role for financial regulators and requires a change of mind-set on their part. To assist in navigating this new regulatory frontier this article recommends that, in promoting financial inclusion, financial regulators must sharpen their focus on understanding and building consumer demand for digital financial services ("DFS").[1] Regulators are already focused on designing enabling regulatory frameworks to accommodate the new players and innovative DFS; largely because DFS have been held out as key innovative solutions to improve financial inclusion. However building consumer demand is also critically important to the success and sustainability of DFS ecosystems; end-users' needs and desires must be a key focus. Without focusing on consumer demand DFS will suffer from limited uptake and we may be left with sophisticated frameworks for overseeing and regulating DFS but with little DFS to regulate.

Of course, the focus on consumer demand is merely one aspect of a successful DFS ecosystem. Providers will also need to, for example, design highly efficient DFS systems with such low transaction costs that the business can be done profitably.[2] However, to explore all factors which drive the success of DFS ecosystems is beyond the scope of this article and we focus on one relatively new concept for financial regulators: their role in understanding and

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[1] A note on terminology: digital financial services ("DFS") is a term which is increasingly used in place of more specific terms such as mobile money. DFS recognize there are a range of players and technology platforms involved in providing access to financial services. In this article, DFS is used to refer to a range of financial services accessible via digital remote access, including e-money or mobile money. This is in contrast to traditional financial services accessed through physical means, such as visiting a bank branch. For more terminology definitions see *Mobile Financial Services: Basic Terminology*, Alliance for Financial Inclusion (March 2013) http://www.afi-global.org/sites/default/files/publications/mfswg_gl_1_basic_terminology_finalnewnew_pdf.pdf.

[2] Rodger Voorhies, Jason Lamb and Megan Oxman, *Fighting Poverty Profitably—Transforming the Economics of Payments to Build Sustainable, Inclusive Financial Systems*, Bill and Melinda Gates Foundation (September 2013).

building consumer demand for these promising and innovative financial products.

This article explains the importance of financial regulators *understanding* and *building* consumer demand so as to encourage sustainable DFS ecosystems which can improve financial inclusion. In understanding and building consumer demand, financial regulators will be able to intelligently direct or channel industry efforts towards encouraging sustainable DFS ecosystems which improve financial inclusion. In particular, it is recommended that regulators turn their attention to *partnerships* in DFS space as one way to build consumer demand. This refers to partnerships between payments providers, banks, microfinance institutions ("MFIs") and mobile network operators ("MNOs"). Such partnerships are fast emerging as a principal way to build consumer demand in the DFS space and a path towards successful sustainable DFS ecosystems.

Financial regulators must be ready to identify and assess the risks from prospective partnerships and adjust regulatory frameworks so they are open to the benefits of partnerships and responsive to the risks. It will be critical to ensure financial safety and stability is maintained alongside greater financial inclusion. Two areas are highlighted for regulators to focus on in their approach towards the identification, assessment, and mitigation of risks arising from partnerships in DFS:

- Collaboration risks; and
- Consumer risks which arise as a result of a greater range of product offerings available via a mobile phone.

The analysis of these risks arising from partnerships is at an elementary stage. Further analysis and research in this area with the objective of improving existing knowledge and awareness of the regulatory challenges arising from partnerships in DFS will be conducted. There are two appendices at the end of each part of this article. The first provides a list of acronyms used throughout the article and the second provides a glossary of terms.

BACKGROUND

The Regulation of Digital Financial Services—International Developments

The regulation of DFS, and mobile money in particular, is currently the focus of considerable discussion and debate among development partners, policy "think-tanks," industry researchers and academics. Financial regulatory frameworks for mobile money are evolving at a fast pace in emerging markets (fast for the world of financial regulation). Regular announcements cite the latest moves by countries in establishing enabling regulatory environments for mobile money. These new regulatory environments respond to the entry of new players in the payments space; players previously not captured by financial regulation.[3]

Internationally accepted standards for the regulation of mobile money are also emerging; the Alliance for Financial Inclusion ("AFI"), and in particular its Mobile Financial Services Working Group ("MFSWG"), is proactive in this area, providing a platform for regulators to share, discuss and develop consistent understandings of the regulatory issues. AFI and MFSWG develop and publish guidance papers outlining common approaches for the oversight and supervision of mobile money and mobile financial services more broadly.[4]

However, regulatory approaches for dealing with the wider category of products becoming available through partnerships in DFS (products such as loans, insurance and savings) are still very much in the nascent stage. The same could be said of our understanding of the regulatory challenges presented by partnerships themselves in DFS. This article presents these issues as a new regulatory frontier and provides initial guidance for regulators to respond to partnerships in DFS. As partnerships in DFS assist in building sustainable DFS products we consider it critical for regulators to be ready to respond.

Financial Inclusion—International Developments

The increased international focus on financial inclusion is also contributing

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[3] *See for example* comments of Alliance for Financial Inclusion's Senior Policy Advisor, John Owens, on Tanzania's approach to the regulation of mobile money: John Owens, *Highlights on the Mobile Financial Services Landscape in Tanzania and Lessons for Regulators*, Alliance for Financial Inclusion (February 24, 2014) http://www.afi-global.org/blog/2014/02/24/highlights-mobile-financial-services-landscape-tanzania-and-lessons-regulators; *see also* GSMA's article published in December 2013 on the regulatory development for mobile money in Brazil and Peru—this provides a good overview of the benefits of leveling the playing field for non-banks through regulation: Mireya Almazan, *Mobile Money for the Unbanked*, GSMA (December 19, 2013) http://www.gsma.com/mobilefordevelopment/mobile-money-regulation-in-latin-america-leveling-the-playing-field-in-brazil-peru; for a recapitulation on what is meant by an "enabling" regulatory environment, *see* Eva Gutierrez and Sandeep Singh, *What Regulatory Frameworks are More Conducive to Mobile Banking? Empirical Evidence from Findex Data* (World Bank Policy Research, Working Paper No 6652, October 1, 2013) http://ssrn.com/abstract=2338858.

[4] *See*, *Mobile Financial Services: Consumer Protection in Mobile Financial Services*, Alliance for Financial Inclusion (March 2014) http://asbaweb.org/E-News/enews-37/incfin/06incfin.pdf; *Mobile Financial Services: Supervision and Oversight of Financial Services*, Alliance for Financial Inclusion (February 2014) http://www.afi-global.org/sites/default/files/publications/mfswg_guidelinenote12_oversight_and_supervision_of_mfs_2.pdf.

to the fast pace of regulatory developments for DFS; as such products are seen as a principal path towards greater financial inclusion and economic development.[5] Policymakers must now look beyond their traditional policy objectives of promoting safe and efficient financial systems to also focus on promoting financial inclusion.[6] This dual regulatory focus of ensuring safe and sound financial systems while developing financially inclusive systems has been referred to as "the two sides to the financial inclusion coin;" enabling innovation to reach the financially excluded while at the same time providing protection for those newly included to ensure they have confidence in the system and use it regularly.[7]

With financial inclusion the regulatory focus should be not only on financial sector regulation and supervision but also on realizing the broader economic and social policy objectives and the potential for inclusive growth. In this context, the Consultative Group to Assist the Poor ("CGAP") highlights comments from Pia Roman, head of Financial Inclusion at Bangko Sentral ng Pilipinas ("BSP"), the Philippines' central bank: Roman noted that the result of making mobile financial services available for a remote island in the Philippines, Rapu Rapu, was increased economic activity on the island.[8]

Alfred Hannig (executive director of AFI) has noted that the phenomenon of

[5] DFS can drive greater financial inclusion because they offer more than merely a viable alternative to the hawala systems or basic remittance networks which simply transfer cash from A to B. As mobile money also involves storing values electronically it provides the end-user with a potentially improved budgeting and payments mechanism compared to cash remittance receipts held under the mattress. Financial products and services can also be wrapped into the mobile money service including credit and insurance creating greater demand for the DFS. The DFS ecosystem is still in its nascent form, as deployments are still to crack just how to create the ecosystem necessary for mass adoption and usage in many markets, i.e. how to extend mobile money beyond a simple "cash-in"/"cash-out" service to be where "cash-in" stays "in." This ideal DFS ecosystem is to be strived for because financial inclusion will take hold, financial systems will be strengthened and economic development will benefit.

[6] Financial inclusion efforts are being aligned, and pursued in tandem, with efforts directed towards financial stability, integrity and consumer protection because they are seen as complementary and because financial inclusion is considered an important means for alleviating poverty and promoting a country's broader economic development. The focus on financial inclusion is seen in many international forums: G20 Summits, the G20's Global Partnership for Financial Inclusion ("GPFI"), the Global Policy Forum ("GPF") of AFI, the Better Than Cash Alliance ("BTCA"), the Financial Action Task Force ("FATF"), and the Bank for International Settlements' Basel Committee on Banking Supervision ("BCBS").

[7] Timothy Lyman, *Building an Enabling and Protective Policy Environment*, CGAP (May 24, 2013) http://www.cgap.org/blog/building-enabling-and-protective-policy-environment.

[8] *Id*.

financial regulators increasingly focusing on financial inclusion is mostly being seen in emerging countries and is progressing to the extent that these emerging countries are "reshaping the approach of central banking."[9] This trend continues and global standard-setting bodies are now actively engaging with regulators seeking to promote financial inclusion.[10]

"Build It and They Will Come"—Avoid the Trap

While this international cooperation and alignment of goals bodes well for financial inclusion, it is important that the refinement and implementation of "best practice" regulatory frameworks does not become the sole focus of financial regulators. Financial regulators, operating with the goal of financial inclusion in mind, also need to ensure end-users are provided with safe, affordable and practical payment options. If payment providers assume the position of "build it and they will come" and regulators respond only by determining how to devise risk-based regulations for the new entities or new payments products and services, the result may be sound and supportive regulatory frameworks for new products and services which ultimately suffer from low uptake and limited success because the products and services do not match what the end-users need and want. This outcome is of little use in improving financial inclusion and is a questionable use of regulatory resources.[11] By focusing on the need to understand and build consumer demand, regulators will assist in avoiding these situations.

Low uptake and inactive users are already common in the roll-out of mobile money in emerging markets. The success stories of Kenya and the Philippines have been difficult to replicate. This situation may have occurred due to a focus on broadening accessibility (i.e. through developing agent networks and mass sign-ups of end-users) without understanding the real desires of end-users. Consumers may have no strong incentive or need to switch to the new products

[9] Alfred Hannig, *Developing Countries Focused on Financial Inclusion are Reshaping Central Banking*, Alliance for Financial Inclusion (November 25, 2013) http://www.afi-global.org/blog/2013/11/25/developing-countries-focused-financial-inclusion-are-reshaping-central-banking.

[10] Alfred Hannig, *Financial Inclusion a New Common Ground for Central Banks*, Alliance for Financial Inclusion (May 14, 2014) http://www.afi-global.org/blog/2014/05/14/financial-inclusion-new-common-ground-central-banks.

[11] Graham Wright (head of Microsave) recently commented on this point in his reflections on the Mor Committee Report in India. Wright notes the Report offers a "sophisticated vision of the financial architecture" and a road map for providing financial access to all, however he questions whether due consideration was given to the demand side noting that "the report seems to imply that low income people's demand for formal financial services was a given." *See* Graham Wright, *The Mor Committee Report—the Demand Side Conundrum*, MicroSave (February 2014) http://blog.microsave.net/the-mor-committee-report-the-demand-side-conundrum/.

or services. As a consequence, development partners are now encouraging greater focus on the demand side. To develop successful DFS ecosystems, it is now recognized that it is necessary to go beyond ensuring these products are simply available, accessible and affordable. Development partners must ensure the products meet consumer demand, are being used and will become sustainable.

Market Forces Not Enough to Deliver Products for Unbanked and Under Banked

Experience to date suggests that financial inclusion regulators and advocates cannot expect market forces alone to deliver products which match the unbanked and under-banked's needs and wants and ultimately improve financial inclusion. This is because the target markets in this case are traditionally from a low-income socioeconomic group which is likely to translate into low returns for providers of products and services if insufficient scale is achieved. While a number of driving forces will be needed to achieve the scale required for profitable products and services for the unbanked and under-banked, this article posits consumer demand as a key driving force behind determining whether the requisite scale for profitability will be achieved.[12]

A Financial Regulator's Role in Understanding and Building Consumer Demand

There is a general trend for regulators to now extend themselves beyond the traditional oversight role of encouraging the safety and stability of the financial system to also focus on actively directing efforts towards increasing financial inclusion. As part of these efforts, financial regulators are focusing on how to encourage the building of sustainable DFS ecosystems. Financial regulators can improve their efforts by sharpening their focus on understanding and building consumer demand for DFS, specifically by:

- Understanding the financial desires of the unbanked and under-banked (including understanding the existing demand for formal financial mechanisms); and
- Facilitating the processes that can build demand for financially inclusive products and services. (Regulators who first understand consumer demand can better appreciate which market developments need to be encouraged or facilitated through policy and regulatory changes.)

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[12] For a discussion on other factors which come into play in developing profitable innovative products and services *see* Voorhies et al, *supra*.

UNDERSTANDING CONSUMER DEMAND

Regulators can assess a DFS product's potential for promoting financial inclusion by considering how well the initiative focuses on *local context* and the *customer value proposition*. Emphasizing these two aspects in DFS initiatives will ensure players are being encouraged to deliver solutions and products which are useful and relevant for the under-banked and unbanked. Considerable research has emphasized the importance of these two aspects for DFS. A summary follows of some of this research highlighting what regulators can consider when assessing if *local context* and *customer value proposition* have been adequately considered.

Local Context

What does it mean when we say consumer demand is an issue requiring an understanding of local context? Davis and Owens contrast different countries to illustrate the importance of local context in understanding demand.[13] In the Philippines the demand is to move money between urban and rural areas and from overseas. The MNOs have therefore enjoyed a distributional advantage over Point of Sale ("POS") networks and their mobile money products, Smartmoney and GCash, have been very successful.[14] In contrast, in South Africa, consumers either have a bank account in which to receive their salary or access to a cash-out facility provided by the government.[15] There is little incentive for consumers in this market to replace their existing methods of accessing funds with a mobile phone payments channel.[16] Attention to the local context is therefore paramount. In order to determine whether a product will be successful, insight into the local customer base will be essential.[17] In particular, any new service must be evaluated in the context of existing services that customers are accessing.[18] Only with that information can a reasonable assessment be made of what might or might not be successful. A good illustration of this point is recent research into smallholder farmers, whose

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[13] John Owens and Ben Davis, *POS vs. Mobile Phone as a Channel for M-Banking,* MicroSave (September 19, 2008) http://www.microsave.net/resource/pos_vs_mobile_phone_as_a_channel_for_m_banking#.VGFGxfmUdqU..

[14] *Id.* at 2.

[15] *Id.*

[16] *Id.*

[17] Debbie Watkins, *Context and Culture: Designing Relevant Financial Services*, CGAP (August 13, 2013) http://www.cgap.org/blog/context-and-culture-designing-relevant-financial-services.

[18] *Id.*

demand for mobile services, including finance and information, is far below the potential it has to benefit their businesses.[19]

Customer Value Proposition

Similarly, what does it mean to understand the customer value proposition in order to assess consumer demand? MicroSave has written extensively on the importance of the customer value proposition and keeping the client's needs at centre focus when designing new products.[20] Manoj Sharma, Managing Director—Asia at MicroSave, has noted what might seem obvious, but what seems to have been missed by many product developers: "Your good intentions are not necessarily good for the client—talk to them and find out."[21] Sharma lists certain questions to address when assessing how compelling the value proposition is for end-users:

- What pain points does the new system address?
- Is it more convenient and easier to use?
- Does it provide value for money (if not less expensive)?
- Is it more secure than alternatives?[22]

Sharma refers to "consumer pull" as being the key consideration. He notes the "natural pull" of particular products such as "money transfers/remittances and welfare receipts" but emphasises that "[a] deeper understanding of consumer aspirations and preferences is essential for the success of other products that do not have the benefit of a natural pull."[23] For example, consumers may want a savings account product but simply be prevented from actively using the account due to expenditure shocks and having very little income to keep as savings. Therefore financial literacy and aggressive marketing may have little effect on long-term usage. In contrast, the demand for other products, such as remittances, is naturally strong and explicit and requires little

[19] Lesley Deyners, *How Do Smallholder Farmers Access Information,* GCAP (January 31, 2014) http://www.cgap.org/blog/how-do-smallholder-farmers-access-information.

[20] Manoj Sharma, *Sustainable Non-Banking Financial Institutions*, MicroSave (Presentation, November 18, 2013) http://www.microsave.net/resource/sustainable_non_banking_financial_institutions#.U5royViSw00.

[21] Manoj Sharma, *DFS for the Under-Banked*, MicroSave (Presentation, Pacific Microfinance Week, October 2013) http://www.microsave.net/files/pdf/MicroSave_DFS_for_the_Under_Banked.pdf.

[22] *Id*.

[23] *Id*.

in the way of marketing and consumer education.[24]

Customer Demand Surveys

Customer demand surveys are also useful for drawing background information. However, care should be taken in interpreting the results of demand studies as survey results depend heavily on the precise questions asked. Surveys are also done at a single point in time when what is needed is an understanding of the longer run perspective—what the customer may need in three months' or a year's time. Capturing customer perceptions in these surveys is also important: perceptions on existing access to financial services (formal and informal) and what customers may perceive as valuable in a new service or product.[25]

Understanding Consumer Demand—Not So Straightforward

Ignacio Mas has looked at why moving consumers from informal financial mechanisms to formal financial mechanisms, such as DFS, is not as straightforward as some might believe or want.[26] Mas posits an interesting thesis on how to marry the "richness of informal financial practices" with the "structure of formal finance" to create a financial experience analogous to eating a "richly layered cake."[27] Mas describes how the various needs underpinning financial inclusion can be thought of as layers of a cake which combine to offer a texture, flavor and color which can only be fully experienced when slicing through the various layers.[28] Mas emphasizes that it is only through combining formal and informal financial mechanisms, akin to combining the various layers of a cake, that the benefits of financial inclusion come to the fore.[29] Mas gives the example of M-Pesa referring to the formal mechanisms as being the MNO offering the product, and the Central Bank and competition regulator overseeing the process; while the informal mechanisms are the existing domestic remittance methods embedded in Kenyan culture[30] (which quickly shifted

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[24] Ishita Gosh, *Remittances vs. Savings on the Mobile Money Platform (Part 2)*, Institute for Money, Technology and Financial Inclusion (July 23, 2013) http://blog.imtfi.uci.edu/2013/07/remittances-vs-savings-on-mobile-money.html.

[25] Watkins, *supra*; Deyners, *supra*.

[26] *See* Ignacio Mas, *Digitizing the Kaleidoscope of Informal Financial Practices,* 3 Journal of Business Management and Social Science Research 50 (2014).

[27] *Id.* at 57.

[28] *Id.*

[29] *Id.*

[30] Mobile Money Africa recently reported on M-Pesa agents observing a tripling of transactions over the Christmas and New Year period as people sent money to relatives and

across to being remitted via mobile money upon commencement of M-Pesa). These formal and informal mechanisms combined to create the DFS ecosystem that is today spurring on financial inclusion in Kenya.[31] Mas cites Susan Johnson as appropriately revealing this "source of the magic that has lit up Kenya with electronic money" which Johnson has termed "The Rift."[32]

Mas explains that by combining informal and formal mechanisms end-users will feel as though they own the financial services relationship and have control over their money.[33] Mas emphasizes that the needs of end-users should be viewed in a different light to that taken by many deploying new products to date. New products should not simply be built and rolled out with consumer education on how to use the new products with the expectation that this will create consumer demand. Instead Mas advocates pursuing a more detailed understanding of what is important to the end-users operating in an informal economy and then working out how to combine those important informal disciplines and mechanisms with formal payments disciplines and mechanisms. This would give rise to digital savings solutions which could displace informal savings options.

APPENDIX 1: List of Acronyms

AFI	Alliance for Financial Inclusion
BPNG	Bank of Papua New Guinea
BSP	Bangko Sentral ng Pilipinas
CAK	Communications Authority of Kenya
CBA	Commercial Bank of Africa

friends as gifts, *see Mobile Money Agents in Await Huge Commissions after Christmas Boom*, Mobile Money Africa (January 6, 2014) http://mobilemoneyafrica.com/details.php?post_id=1544.

[31] Today, greater than 40 percent of GDP flows through M-Pesa, more than two-thirds of the adult population use it and the Head of Strategy for Financial Services, Sitoyo Lopokoiyit, at Safaricom (the operator of M-Pesa), recently interpreted this usage figure to mean that 80 percent of the population in Kenya is now considered financially included but without M-Pesa this figure drops to 23 percent. Lopokoiyit noted that now with M-Shwari, M-Pesa users are provided with further formal financial services; M-Shwari is a partnership between Safaricom and the Commercial Bank of Africa. Users can move savings into M-Shwari using their mobile phone and M-Pesa account, it is an opt-in service, the savings earn interest and M-Shwari users can also borrow funds. Users are learning about savings and credit ratings through education provided by Safaricom. Lopokoiyit noted there were now four million M-Shwari customers (*see* Kyla Yeoman, *Interview: How M-Pesa Innovates New Business Models for its Base of the Pyramid Customers*, Global Envision (December 13, 2013) http://www.globalenvision.org/2013/12/13/interview-how-m-pesa-innovates-new-business-models-its-base-pyramid-customers).

[32] Mas, *supra* at 57.

[33] *Id.* at 58.

CGAP	Consultative Group to Assist the Poor
DFS	Digital Financial Services
G2P	Government to Person
MFI	Microfinance Institution
MFS	Mobile Financial Services
MFSWG	Mobile Financial Services Working Group
MMU	Mobile Money Unit
MNO	Mobile Network Operator
MVNO	Mobile Virtual Network Operator
NBFC	Non-Bank Finance Company
NMB	Nationwide Merchant Bank
P2G	Person to Government
POS	Point of Sale
RBI	Reserve Bank of India
RBM	Reserve Bank of Malawi
SBS	Superintendencia de Banca, Seguros y AFP

Appendix 2: Glossary

E-money	Monetary value electronically recorded with the following attributes: (i) issued upon receipt of funds in an amount no lesser in value than the value of the e-money issued; (ii) stored on an electronic device (e.g. a chip, prepaid card, mobile phone, or computer system); (iii) accepted as a means of payment by parties other than the issuer; and (iv) convertible into cash.*
Cash-in	Exchanging cash for e-money.
Cash-out	Exchanging e-money for cash.
Collaboration risk	Risks arising from the legal structure of a joint venture. For example, while the finances of each partner in a joint venture might be robust, the joint venture vehicle itself may be poorly capitalized and carry a real risk of insolvency.
Consumer risk	Risks consumers are directly exposed to by their use of a service. For example, fraud, breaches of privacy, or the accumulation of debts that the consumer is unable to service.

* Definitions from Alliance for Financial Inclusion, *Guideline Note Mobile Financial Services: Basic Terminology* (2013) http://www.afi-global.org/sites/default/files/publications/mfswg_gl_1_basic_terminology_finalnewnew_pdf.pdf.CGAP.

Customer Value Proposition	The benefits a product or service holds for a customer. The reasons why a customer might buy that product or service.
Digital Financial Services	Financial services provided via digital remote access, including e-money or mobile money. This is in contrast to traditional financial services accessed through physical means, such as visiting a bank branch.
Enabling regulator	An agency that creates a regulatory environment conducive to the safe growth of mobile money.