

CASH DELIVERY MECHANISM ASSESSMENT

FOR REFUGEES, MIGRANTS AND ASYLUM SEEKERS IN LIBYA

REPORT - SEPTEMBER 2017





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EXECUTIVE SUMMARY

This assessment aims at taking stock of the different cash delivery mechanisms available for transferring cash to vulnerable populations inside Libya, with specific focus on refugees, migrants and asylum seekers. Conducted by ACTED, IRC and MC, the assessment aims to fill the information gap related to opportunities and risks associated with different mechanisms of cash delivery. This effort contributes to a broader feasibility study, coordinated by the Libya Cash and Markets Working Group, that is intended to identify potential opportunities, assess the appropriateness of cash transfer programmes (CTPs) in country and identify potential opportunities, to implement such programmes. To fill the information gap related to opportunities and risks associated with cash delivery modalities in Libya, and to improve the effectiveness of the CTPs supporting migrants, refugees and asylum seekers, ACTED, IRC, and MC conducted a rapid cash delivery mechanism assessment in the country.

Through a combination of desk review, key informant interviews and focus group discussions, the assessment team identified and evaluated a number of different cash delivery options. The assessment focused on the main urban hubs: Tripoli, Misrata, Sabha and Benghazi. Those locations remain the principal hosting areas for settled migrants, refugees and asylum seekers.

FINDINGS

- Refugees, asylum seekers and migrants legally residing in Libya consider a Cash Based Response to be a viable solution to increase access to basic goods and services;
- There is a strong perception that scaling up cash in hand might increase safety-related risks for beneficiaries;
- Tripoli, Misrata, and Benghazi present peculiarities in terms of cash delivery mechanisms, that would avoid the use of physical cash;
- Use of electronic payments is progressively increasing all across the country;
- Private companies are collaborating with commercial and public banks to increase access to electronic;
- Vendors are thought to increase prices of goods and services when purchases take place through electronic transactions;
- Financial service providers are scaling up products for people who don't have access to banking systems;

RECOMMENDATIONS

- Humanitarian actors should design CTPs for refugees, migrants, and asylum seekers within a framework that entails an effective integration of the do no harm principle.
- The most appropriate way to fully succeed in reaching the desired outcomes is to completely avoid actions that can jeopardize humanitarian access. Libyan authorities are increasing control over non-compliant financial transactions. Hawalas, and informal cash transfer agents should, for instance, be avoided.
- Given the risks related to *cash in hand* distributions, humanitarian actors should use channels and financial services providers endogenous to the Libyan context to minimize CTPs that include physical cash distributions, especially to non-Libyans.
- Due to the current regulations, CTPs should target vulnerable non-Libyans (including refugees and asylum seekers) who are settled in Libya holding the required legal documentations, as CTPs targeting migrants in transit would increase their exposure to safety related threats.

BACKGROUND

Widespread and systematic violations of human rights, monocratic political systems, and scarcity of livelihood opportunities are the root causes for cross-country waves of population movements from Sub-Saharan countries (mostly West and Horn of Africa) towards Libya, some with the intention of settling and others in transit to a new life and safety in Europe. Abetted by internal instability and the high porosity of the southern borders, the surge of migrants has continued to go unchecked. Estimates



based on embassies' figures place the number of migrants currently within the country at between 700,000 – 1 million, of which the International Organization for Migration (IOM) has located and identified at least 251,862 of as December 2016. Of those IOM identified, 105,994 are located in Tripolitania, which is main area where migrants stop and seek work and opportunities, as it offers economic opportunities and is in close proximity to departure points to Europe.

While political and media debates focus on the perilous journey made by migrants and refugees across the Mediterranean, this obscures the long road they endure before reaching Libya's borders let alone Europe. A consistent percentage of migrants unsuccessfully seek secure work opportunities in Libya, which drives them to save money to proceed to Europe. Similarly, asylum seekers and refugees are seeking protection, safety and security in Libya. However, the precarious legal status of migrants and refugees in Libya is compounded by political uncertainty, limited economic opportunities and growing prejudice, in particular against Sub-Saharan Africans, and general insecurity. They are often exposed to abuse and exploitation, including detention, abduction and forced labour, with little to no means to seek support in the context of a fragile refugee/migrant protection system.

Furthermore, as is the case for vulnerable Libyans, migrants, refugees and asylum seekers in Libya face severe financial barriers to meeting their basic needs largely due to low access to livelihood opportunities (due to discrimination, detention, low-skill set, limited access to financial services, indebtedness/exhausted savings, disrupted economy etc.) as well as the general political instability and insecurity in the country. Within the abovementioned context, Cash Transfer Programs (CTPs) could represent an appropriate initial humanitarian approach to mitigate those aspects of vulnerability related to financial exclusion, and to allow migrants to contribute financially to host communities.

Though a small number of humanitarian organizations have implemented or are currently implementing CTPs in Libya, CTPs in Libya represent a small part of the overall humanitarian response. This is in part because of the lack of concrete evidence to inform efficient and adequate programming that takes into consideration the unique constraints of delivering cash assistance to non-Libyans (who face potential immobility due to detention or insecurity, discrimination, lack of access to financial service providers due to lack of identification, language barriers, etc.), and in part because of the perception that challenges and risks of implementing CTPs in Libya (including liquidity issues and risks tied to the extremely unstable, insecure context). That said, there has been no in-depth analysis of the opportunities and risks associated with cash delivery modalities more generally in Libya or even in respect to assistance to internally displaced Libyans, host communities, and returnees.

METHODOLOGY

This assessment was conducted over a four weeks period in August 2017 and involved five team members from Mercy Corps and ACTED, led by a Libyan CSO – Moomkeen Organization. Following a desk review and briefing meetings with the Mercy Corps team, in-depth service provider capacity assessments were conducted with three different providers in Tripoli, including Masarat (offering Branchless Banking and Mobile Money), Moamalat (offering debit cards, prepaid cards and Hawalas) and Tadawul (offering prepaid cards). Questionnaires were prepared with the support of Mercy Corps' financial inclusion specialist. To better understand the perspective of the likely target population of future CTPs in Libya, two focus group discussions were held in Tripoli, one each for men and women. Finally, semi-structured interviews were conducted with representatives from CESVI and IMC, to ask about their agencies' experiences implementing CTPs in Libya. The consultant compiled data and shared it with a team of Mercy Corps and IRC staff for comment. Data analysis and report writing was led by Mercy Corps' Libya team with input from IRC.

Because of the difficult security situation in Libya, the agencies commissioning the assessment had limited oversight of the assessment implementation. Though there were some gaps in the dataset that was eventually provided to the commissioning agencies (e.g., limited data from the perspective of the target population), because of time constraints, it was unfortunately not possible to fill in information

gaps. In addition, because of the difficult security context, all data collection occurred in Tripoli. While some interview questions asked about the availability and function of financial service providers in the other geographic areas of interest, the responses were not cross-checked. Finally, because the consultant was hired to collect data and not to also complete the analysis and reporting processes, the report writers faced some challenges in analysing and interpreting the dataset provided. This report therefore presents only the key messages that jumped out from the data quite clearly and does not represent an exhaustive analysis of all data gathered. Additional data gathered is provided in the annexes to this report.



DELIVERY MECHANISMS SNAPSHOT

Banking Sector: Penetration and Access

The analysis conducted aimed at having an overall understanding of locally available payment solutions, and at having representative information on coverage and penetration of delivery mechanisms.

Currently **18 banks** are operational in the country, with a total of approximately **410 bank branches**. Bank branches are present all across the Libyan territory with a higher concentration in the urban locations in the north of the country. The number of ATMs in Libya is reported to be close to **500**, meaning **12 ATMs per 100,000 adults**.

The number of ATMs has exponentially increased during the past five years. **In 2012**, according to figures provided by the World Bank, the number of ATMs **per 100,000 adults was 3.8**.

Cards (debit – pre-paid)

The use of debit cards, as well as pre-paid cards, seems to be quite spread across the urban areas, where the majority of Points of Sale (PoS) are located.

As of August 2017, **3,400 PoS terminals were operational** in Libya while **one million debit cards** have been released. Several options in relation to **pre-paid cards are available**.

Mobile Network Operators (MNOs)

Two MNOs remain active since before the outbreak of the conflict in Libya. Those are **Libyana** and **Al Madar**.

11,041,749 SIMs are active in Libya, and **90 percent** of the population in Libya lives in an area where **network coverage** is ensured. All four areas of interest for this report (Tripoli, Misrata, Sabha and Benghazi) fall within this area of reliable network coverage.

Mobile Money (MM) Products

Although both MNOs are offering MM products, the **penetration is far from being universal**. There are approximately 8,000 active users of MM inside Libya, out of a population of over 6 million. Products provided by the two MNOs have **direct links to banks**.

Branchless Banking (BB) Products

Branchless Banking products are available in Libya. Third party providers are well known in the urban locations, as they are currently conducting a strong communication campaign across the country.

Literacy rate in the country: 85.6 %

Consumer Protection Law: In place since 2010 but not enforced yet.

FOCUS GROUP DISCUSSION RESULTS

Overview of findings

Within the framework of the assessment, two focus group discussions and additional semi-structured interviews were conducted with refugees, non-Libyans without residency permits and non-Libyans with regular residency permits.

Seven men and five women participated in the focus group discussions, both of which took place in Tripoli.

The results showed a substantial difference among the respondents in willingness to participate in a CTP program as a recipient of cash.

While refugees and non-Libyans in general having a residency permit are willing and do not see any particular issues with sharing identification documents to obtain assistance, migrants without adequate legal documentation are more reluctant to expose themselves to international organizations and authorities.

Cash is the only means used to purchase goods and services, although there is consensus around the high level of **risk** that a CTP using physical cash entails for the recipient, presumably in terms of cash making recipients targets of assault/theft or exploitation. That said, the humanitarian agencies that are currently implementing CTPs in Libya are doing so using cash-in-hand, which seems to be working fairly well at its current scale. No specific security incidents related to the distribution of cash in hand were reported, so it is unclear to what extent the risks of cash in hand are perceptions versus reality.

None of the respondents living in Tripoli indicated having **any knowledge about MM** products in Libya and therefore were not being able to identify risks and opportunities related to it.

However, payments through debit and pre-paid cards are increasing, and those consulted reported being favourable to CTPs implemented through the use of **e-cards**.

While this is valid for Tripoli, it remains unclear if refugees and non-Libyans living outside Tripoli would be willing to be recipients of CTPs. Ideally, agencies considering CTP in other areas should consult with the target populations there before deciding on a payment mechanism.

Respondents also stressed out the **lack of access to banking systems** and services in general for refugees and asylum seekers. Non – Libyans in Tripoli (holding a **residency permit**) do have **access to bank accounts**, but due to the shortage of cash, the potential volume of transactions has decreased after the outbreak of the conflict.

E-Cards

While settled migrants mentioned having familiarity with the use of e-cards, refugees interviewed reported not being aware of the presence of e-card payment systems in Libya.

Refugees have been receiving cash in hand as humanitarian assistance. Cash in hand, as well, is how they reported receiving remuneration for casual labour.

After having received an overview of e-cards and pre-paid cards as cash delivery mechanism options, participants in focus group discussions considered these mechanisms to be safer and more efficient than cash in hand.

Nonetheless, interviewees had some concerns about electronic transfer mechanisms. First, they mentioned clear barriers to accessing shelter with e-payments, as rent must always be paid in cash or through wire transfer. Further, prices are reported to be lower in souks and open markets, where e-

FGD PARTICIPANTS' NATIONALITIES

Refugees : Syria, Sudan, Niger

Migrants: Benin, Central African Republic

payments are generally not accepted, while supermarkets sell goods at higher prices. Syrian refugees were concerned that they would not be able to use e-cards to purchase Syrian-specific food items, unless their preferred shops were supported to install and utilize point of sale equipment.

In terms of potential risks associated with e-payments, sub-Saharanans interviewed reported possible issues with the perception Libyans might have of a non-Libyan sub-Saharan purchasing goods with an e-card.

Women interviewed consider e-cards to be safer than cash, since such cards would likely reduce the amount of time women would be moving around outside the home with physical cash in hand.

Mobile Money

None of the participants in the focus group discussions were familiar with MM solutions in Libya. Refugees interviewed reported being uncomfortable with the idea of using their SIM cards to receive financial resources, as SIM cards are normally bought through proxies.

The Mobile Network in Libya is reliable and particularly stable, and during the Focus Group Discussions refugees expressed their willingness to participate in CTPs implemented through MM if they could obtain SIM cards without having a passport.

FINDINGS

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- Use of electronic payments is progressively increasing all across the country;
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RECOMMENDATIONS

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APPENDIX A – 1: Masarat

Service Provider Capacity Assessment

Item No.	List of Requirements	Minimum Service Requirements
General Information		
1	Service Name	Mobi Cash , Other related services are: Mobi Mal, Mobi NAB , Musrefy , Whada Mobile
2	Agreement	<p>The agreement will be between The Humanitarian Agency as the first party and Masarat and/or partner bank as the second party.</p> <p>Masarat is responsible for providing the Service and support including the Merchant/Agent network for The Humanitarian Agency.</p> <p>The PoC will be treated like a bank customer and The Humanitarian Agency will have full access to the system as if they were bank employees.</p> <p>Masarat will cover legalities in order to ensure service in local markets.</p> <p>Masarat will take full risk responsibility in terms of technical issues including fraud.</p> <p>The Humanitarian Agency’s responsibilities are primarily:</p> <ul style="list-style-type: none"> - To transfer the funds to Masarat bank account. - To define the bulk transfer rules and/or the data entry of the bulk transfer using the interface of the account. - To do tracking, auditing and follow up.
3	Other Privileges	<ul style="list-style-type: none"> - The project will be considered partially as a Masarat Social responsibility activity. - System is built based on the local context. - Client will have full control of his account. - Client staff will be trained. - Full support and training for the Client. - Access to 5 bank services: “Masarat partners” - For some type of contracts, there is no fee for account establishment and transactions. - Offline payment will be available in the future. - PoC “customers” will benefit from special discounts at merchant network. Discounts will be up to 50% in some seasons.

Payment Product Details: Corporate (payer)

4	Transaction Tracking Capabilities	<p>The account has a full interface and reporting tools which enable users to track activity based on the authority designed by the main user of the account. Details as follow:</p> <ul style="list-style-type: none"> - The humanitarian agency will define the rules to allow the top-up of each wallet user from a special interface which will be provided to monitor the top up amounts per account and per group. - The humanitarian agency can change the settings of the daily limits or transaction limits per merchant or customer. - Merchants will have the ability to track any transaction in their wallet or in their bank account using special mobile application. - The humanitarian agency will have monitoring/reporting tools to monitor all transactions.
5	Registration and Know Your Customer Requirements (Corporate Account)	<p>The service will be provided in partnership with one of the partners of Masarat bank. The following financial regulations will apply:</p> <ul style="list-style-type: none"> - Corporate License - Sign up application form - Having merchant account on the bank - KYC level 1 of the merchant owner.
6	Full description of disbursement (Payment Process)	<p>Digital Wallet Accounts Top-up Process</p> <ul style="list-style-type: none"> - Each PoC “customer” should sign up to have the digital wallet account. - The humanitarian agency will transfer the total amount required to be topped up to the PoCs “customer” account. - The humanitarian agency will top up the PoC “customer” wallet accounts within the limit of the amount transferred to Masarat bank account. The top-up process could be automated using predefined rules or manually for each wallet account or group of wallet accounts. - Each PoC “customer” will receive SMS notification when they receive the amount in his wallet account. <p>Payment process</p> <ul style="list-style-type: none"> - Any PoC “customer” can pay using their wallet account in four different ways: <ol style="list-style-type: none"> 1) Using SMS authentication, 2) Using Hardware token authentication, 3) Using NFC card, 4) Using QR code authentication. <p>The first method, SMS authentication, is the default method in the system. The Humanitarian agency can choose to use a different method. The full description of each method is below, the success scenario is described in each case, the exceptions or failure due to any reason is not described here:</p>

1) SMS-based authentication:

- Merchant starts the process by entering the customer ID and amount in special mobile app or POS terminal.
- Customer will receive SMS containing OTP, merchant ID, transaction number, and the amount.
- Customer gives the OTP to the merchant should he agree to finalize the payment process.
- Merchant enters the OTP in the merchant app and confirms the payment.
- The payment is completed when the amount is deducted from the customer wallet account and transferred to the merchant wallet account.
- Both merchant and customer can verify the payment process using SMS service or mobile app by entering the process number.

2) Hardware OTP token generator -based authentication:

- Merchant starts the process by entering the customer ID and amount in special mobile app or POS terminal.
- Customer will read the OTP from the hardware token.
- Customer gives the OTP to the merchant should the merchant agree to finalize the payment process.
- Merchant enters the OTP in the merchant app and confirm the payment.
- The payment is completed when the amount is deducted from the customer wallet account and transferred to the merchant wallet account.
- Both merchant and customer can verify the payment process using SMS service or mobile app by entering the process number.

This method is designed especially for the Libyan market due to unsuitability of mobile operator coverage and delay of SMS services. The other advantage of this method is that the customer doesn't need to have a mobile to benefit from the service when he needs to make a payment.

3) NFC-based authentication :

- Merchant starts the process by entering the customer ID and amount in special mobile app with NFC support or POS terminal with NFC support.
- Customer will use his NFC card and place it on the merchant POS or mobile.
- Customer enters Password in the merchant app or the POS terminal should the merchant agree to finalize the payment process.
- The payment is complete when the amount is deducted from the customer wallet account and transferred to the merchant wallet account.

4) QR code-based authentication:

- Customer starts the process by entering the merchant ID in customer app, or reading the merchant ID by camera in QR format encrypted using the customer key.
- Customer enters the payment amount to the merchant in the app.
- Customer enters his password in the confirmation dialog screen.
- Customer app generates QR code containing all the required information including customer ID, amount, date, time, and merchant ID.

		<ul style="list-style-type: none"> - Merchant reads the QR code using the merchant app on his POS terminal or his mobile phone. - Customer confirms the payment process by entering his password in the merchant app. - The payment is completed by deducting the amount from the customer wallet account; it is then transferred to the merchant wallet account. <p>In all cases above both the merchant and customer can verify the payment process using SMS service or mobile app by entering the process number.</p>
7	Account balance and transaction volume limitations (Corporate Account)	<p>No regulations currently defined for digital wallet, but the bank usually sets rules to minimize risk. Some of the rules applied to the merchant are included below as a reference.</p> <ul style="list-style-type: none"> - Payments of funds are transferred to the pool account before the merchant can access it. - Merchant funds are transferred from pool account to merchant access account in 2 to 7 days. - Merchant can receive up to 200K payment transaction volume per day.
8	User Authorization	<p>Masarat system support multi-level user authorization system</p> <ul style="list-style-type: none"> - The humanitarian agency admin can define multiple users with different authorities on the system. - Merchant can define multiple users to operate the POS terminal or app, each user with a different ID and password.
9	Brochure, Catalog and Booklet	<p>Masarat provides special visibility items for the merchant, taking into account the unique characteristics of the service available. As such, Masarat commits to the printing of focused booklets, posters and catalogs to provide information about this service.</p>
10	Interoperability	<p>Masarat has developed a special function for Cash-In and Cash-out which functions with other system, especially local systems such as Tadawel. In the future, Masarat will also integrate with other local providers.</p>
11	Pricing	<p>Masarat agrees to offer this service completely free of all transaction fees.</p> <p>Other commercial services provided by Masarat include:</p> <p>For every payment transaction :</p> <ul style="list-style-type: none"> - Merchant transaction tariff depends on the business type (1% for food, education, medicine up to 4% for cosmetics, entertainment, 4 and 5 star hotels). - Customer is charged 1 LYD per transaction or 0 to 1% per transaction.
12	Data Storage	<p>Masarat has its system running at a Libya Telecom & Technology Data center plus a backup location at Masarat data center. Masarat also has a third location for data backup, which is internal.</p>

		Data records will be stored in the system database organized by customer and merchants IDs. All data will be available to the authorized users based on the specified rules.
Payment Product Details: End User (payee)		
13	Receipt of Funds	SMS message or Email.
14	Registration and Know Your Customer Requirements (end user account)	<p>The service will be provided in partnership with one of the Masarat bank partners. The following financial regulations are applied:</p> <ul style="list-style-type: none"> - PoC “Customer” should be Libyan citizens or foreigners registered with the Libyan authorities and have official documents. - PoC “Customer” should fill out a Sign-up application form. - PoC “Customer” should be physically present at the signing of a contract, where a Masarat agent will also be present. This requirement may be negotiated with the bank to give this authority to the humanitarian agency representatives. - Any special government or regulation requirements will be applied. - Know Your Customer (KYC) level one is required, with basic information such as Name, ID/Passport number, Date of birth , Address, National Number)
15	Account balance and transaction volume limitations (End User Account)	<p>There are no local regulations which define the limitations of the account balance of digital wallet or the volume transaction, but based on the experience of Masarat, banks set some limitations the average of which is generally 5,000 LYD as account balance, volume transaction is based on the merchant business; in general limitations are adapted to the need of the market, but these should be defined to minimize risk.</p> <ul style="list-style-type: none"> - Account balance should have a maximum limit to minimize the risk for all parties. This limit should be discussed per case and will require bank approval. <p>Though there are no technical limitations for volume of transaction, Masarat and the humanitarian agency should together define suitable limitation by merchant business.</p>
Distribution		
16	Coverage Area and Distribution network	<p>Masarat is currently operating 40 merchant POS in the East of Libya, and is committed to covering up to 1000 POS in any Libyan city; this process will be undertaken in stages in the time period of two months.</p> <p>Masarat agents are currently available in most Libyan cities, working with most bank branches.</p> <p>In addition to current Masarat agents, Masarat solutions handle the merchants POS as Agents to provide the Cash-out.</p>

17	Cash in/Cash out Liquidity Controls	<ul style="list-style-type: none"> - Cash-In will be provided to client admin through a specific user interface. - Cash-out will be provided through Masarat agents and merchant POS. - Liquidity control rules can be defined in the system to avoid risks, based on client rules and local regulations.
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Customer Service/Training: Corporate (payer)

18	Training for staff	Masarat will provide all client-based training.
19	Technical Support/Service Level Agreements	<p>Masarat has the ability to offer a high level of technical support due to the fact that the bank is already providing technical support to six other banks (about 700,000 customers). Masarat is also in the process of developing their systems in-house, making it easier to modify and add features and functions as they become necessary.</p> <p>Masarat will define the service level agreement based on the authentication technology used during the payment process.</p> <p>In general, Masarat's system availability can be guaranteed at about 99%, but the bank cannot be held responsible for the availability of systems outside of its control, such as ISP or mobile operator service.</p>
19	Disbursement Troubleshooting	<ul style="list-style-type: none"> - Masarat Call center is active 14 hours per day - System engineers are working 24/7 - Masarat has a special interface for Masarat systems engineers, which enables them to provide thorough end user support and troubleshooting. - Masarat developed a self-diagnosis component in its systems that notify system engineers when something has gone wrong.

Customer Service/Training: End User (payee)

20	Training for end users (recipients)	Masarat will provide all the training and awareness material for the End User.
21	Technical Support	<p>Masarat has the ability to offer a high level of technical support due to the fact that the bank is already providing technical support to six other banks (about 700,000 customers). Masarat is also in the process of developing their systems in-house, making it easier to modify and add features and functions as they become necessary.</p> <p>Masarat will define the service level agreement based on the authentication technology used during the payment process.</p> <p>In general, Masarat's system availability can be guaranteed at about 99%, but the bank cannot be held responsible for the availability of systems outside of its control, such as ISP or mobile operator service.</p>

22	Recipient Troubleshooting	<ul style="list-style-type: none"> - Masarat Call center is active 14 hours per day. - System engineers are working 24/7. - Masarat field technicians are available in most Libyan cities to provide technical support for Agents/Merchants. - Masarat provides a special app to the PoC “customer”, providing self-service features.
Data Privacy/Security/Service Provider Internal Controls		
23	Security of Funds	<p>Since Masarat is working in partnership with other banks, all bank policies will be applied to the digital wallet accounts.</p> <p>Some of the fund security measures applied are :</p> <ul style="list-style-type: none"> - AML and anti-fraud - Shadow account will be synced up in the partner bank to synchronize all the funds available in the wallet system. This makes it possible for the bank to control and apply its policies.
24	Data Security	<p>Masarat is a bank and as such, it applies bank requirements related to data security:</p> <ul style="list-style-type: none"> - All transaction data stored in Masarat systems is encrypted. - All transaction data has a backup in different location.
25	Data Privacy	<p>Masarat is a bank and as such, it applies bank requirements related to data privacy:</p> <ul style="list-style-type: none"> - Customer data is stored and encrypted. - No data or information is printed or manipulated manually. - No sensitive data is displayed to system users. - Accounts have different user levels of authority to define what user can access on the system data.

General Information

1. Can you please provide a **sample agreement** between parties? (Service Provider and Customer)?

Masarat can provide a sample agreement after the signature of the MOU with the client.

2. Please provide **any other services or products** that may reinforce your quote. Card payments for one time.

Payment Product Details: Corporate

- How does an organization **verify** that the funds transmitted **reach the intended recipient**? Reports can help to verify, and moreover the account will be under control of the client.
- What are the **maximum/minimum amounts** of funds a corporate client can **disburse in a day**? This is up to the client.
- How **many transactions** can a corporate client **disburse in a day**? The capacity of the system is scalable. The current hardware capacity can handle up to one million customers, 10,000 agent/merchant, and 20 million transactions per day. The software license capacity is open with no hard limitation.

- What is the **clearing and settlement** process for payments?
Since Masarat is already the service provide for many local banks across all Libya, Masarat have a settlement process defined as follow:
 - Masarat Wallet has a shadow account at the Bank which is synchronized with all Cash-IN and Cash-Out to the Wallet.
 - PoC “customer” pay from his Wallet account to Merchant Wallet account, the transaction within the Wallet is online transaction.
 - Every Merchant will have a current bank account at the bank.
 - Merchant can do scheduled or manual Cash-Out from his wallet account to his current bank account.
 - Merchant can do Cash-out upon his request at Masarat agent in cash.
- Are the **fees** for both **sending** and **withdrawing** funds visible when preparing for disbursal?
Yes and it’s up to the contract type between Masarat and the Client. Usually the fees are separated from the amount transferred.
- What is the **pricing structure** of your product?
The pricing structure is flexible:
 - Monthly fees per account
 - Fixed amount and/or percentage of the transaction amount
 - For this project Masarat is committed to provide the service with zero fees.
- How **stable** are the **service provider and power networks**? May we see a copy of the **uptime records (for mobile payments)**?
They have 3% failed transactions because of the Mobile network coverage but there is a system designed to work for the Libyan context so it could be used offline any time .The Offline system is under construction .
- How many **transactions can an end user** account receive in a day?
No limits related to the system capacity, but client can set limit for commercial or regulations reasons.

Data Privacy and Security/ Service Provider Internal Controls:

- How long does the payment service provider **keep accounting records** of transactions?
Records are kept for 1 year.

APPENDIX A – 2: Moamalat

Service Provider Capacity Assessment

Item No.	List of Requirements	Minimum Service Requirements
General Information		
1	Service Name	Prepaid Cards
2	Agreement	The Client, the humanitarian agency or their partners will be considered as one of our bank clients, they will have cards with their logo on it.
3	Other Privileges	<ul style="list-style-type: none"> - Client will have full control of his cards. - Client agent will be trained on the account. - Full support and training for the Client. - Access to 7 Banks services.
Payment Product Details: Corporate (payer)		
4	Transaction Tracking Capabilities	Client will transfer his money to a special bank account where Moamalat can verify that the money was received. Then, Moamalat will add the money to the account of the client.
5	Registration and Know Your Customer Requirements (Corporate Account)	<ul style="list-style-type: none"> - Client should be Libyan or registered with the Libyan government. - Client should have local bank account in Libya. - Client should sign contract with the bank.
6	Full description of disbursement (Payment Process)	<ul style="list-style-type: none"> - Printing of the E-cards for the PoCs and training for the client staff will start after the signature of the contract and after Moamalat receives the first payment. - The client will then have to send the amount of money he wants to be transferred to the account. - After the confirmation is received, the amount will appear at the clients' account. The money can then be distributed by the client himself or by Moamalat depending on the agreement signed in the contract.
7	Account balance and transaction volume limitations (Corporate Account)	<p>The price for the service will depend on the contract and the client's needs.</p> <p>There is no volume limitation.</p>

8	User Authorization	The Client is able to add an authorized user for his account
9	Brochure, Catalog and Booklet	Moamalat can do special printing for the client PoC.
10	Interoperability	No
11	Pricing	From 1% to 4% per transaction. This price can be negotiated with the Client.
12	Data Storage	They have 3 data storage centers at HQ, at LTT company (Libya Telecom & Technology), and soon in Malta.
Payment Product Details: End User (payee)		
13	Receipt of Funds	SMS message or Email.
14	Registration and Know Your Customer Requirements (end user account)	<ul style="list-style-type: none"> - ID, passport or any proof from official agency. - Mobile Number. - Know your customer (KYC) should include Central Bank of Libya (CBL) standards and Client Standards.
15	Account balance and transaction volume limitations (End User Account)	Up to the client.
Distribution		
16	Coverage Area and Distribution network	1,400 active Points of sale (PoSs) in Libya.
17	Cash in/Cash out Liquidity Controls	Cash out up to Moamalat partner banks, Moamalat will provide ATMs at some places starting with Tripoli, and expanding for other cities. And they may come with other solution like liquidizing money at some PoCs.
Customer Service/Training: Corporate (payer)		
18	Training for staff	Moamalat will provide all the trainings needed for the client.
19	Technical Support/Service Level Agreements	Moamalat will provide all the support needed for the client.
19	Disbursement Troubleshooting	Moamalat will provide all the troubleshooting needed for the client.

Customer Service/Training: End User (payee)		
20	Training for end users (recipients)	This should be discussed and added to the contract.
21	Technical Support	Moamalat has a call center for the end users.
22	Recipient Troubleshooting	Moamalat has a call center for the end users and they may open customer services for end users.
Data Privacy/Security/Service Provider Internal Controls		
23	Security of Funds	Moamalat has international standards.
24	Data Security	Moamalat has international standards with 3 backups.
25	Data Privacy	Moamalat has international standards.

General Information:

3. Can you please provide a **sample agreement** between parties? (Service Provider and Customer)?

Moamalat can provide a sample agreement after the signature of the MOU with the client.

4. Please provide **any other services or products** that may reinforce your quote?
There is Hawala, but it's not activated.

Payment Product Details: Corporate

- How does an organization **verify** that the funds transmitted **reach the intended recipient**?
Reports can help to verify, and moreover the account will be under control of the client.
- What are the **maximum/minimum amounts** of funds a corporate client can **disburse in a day**?
This is up to the client.
- How **many transactions** can a corporate client **disburse in a day**?
This decision is open and it is up to the client.
- What is **the clearing and settlement** process for payments?
Moamalat has to provide liquidity for shops through Moamalat bank partners.
- Are the **fees** for both **sending** and **withdrawing** funds visible when preparing for disbursal?
Yes and it's up to the contract type between Moamalat and the Client.
- What is the **pricing structure** of your product?



From 1% to 4% per transaction.

- How **stable are the service provider and power networks?** May we see a copy of the **uptime records (for mobile payments)**?
There are several failed transactions due to the network coverage.
- How many **transactions can an end user** account receive in a day?
This is open.

Data Privacy and Security/ Service Provider Internal Controls:

- How long does the payment service provider **keep accounting records** of transactions?
Records are kept for 1 year and then they are archived.

APPENDIX A – 3: Tadawul

Service Provider Capacity Assessment

Item No.	List of Requirements	Minimum Service Requirements
General Information		
1	Service Name	LYD - Prepaid Cards
2	Agreement	<p>Client, Humanitarian Agency or their partners will be considered as one of our customers who have a number of prepaid cards, they will have Cards with their logo on the Cards but the client would not have authorities over the accounts.</p> <ul style="list-style-type: none"> - Client will not have full control over his Cards or special bulk system. - Access to 7 Bank services.
3	Other Privileges	<ul style="list-style-type: none"> - Tadawul Cards will function fully in 5 cities for now and could be expanded in the future. - They could expand client target areas and find cash solutions.
Payment Product Details: Corporate (payer)		
4	Transaction Tracking Capabilities	The client will transfer his money to a Tadawul special bank account after verification. Tadawul will then transfer the money to the End User as per the client restrictions of each user.
5	Registration and Know Your Customer Requirements (Corporate Account)	<ul style="list-style-type: none"> - Client should be Libyan or registered with the Libyan authorities. - Signed contract with Tadawul.
6	Full description of disbursement (Payment Process)	<ul style="list-style-type: none"> - After signing the contract, and Tadawul receive the first payment, Tadawul will start the printing for the E-cards for the Points of Cash (PoC), and open new Points of Sale (PoS) at the client target areas. - Subsequent to this, the client should send the amount to Tadawul Bank account. - After receiving the money confirmation, and distributing the Cards, the amount will be distributed to the End User Cards.

7	Account balance and transaction volume limitations (Corporate Account)	2500 per Month/ User. Modifiable.
8	User Authorization	Client can add authorities to the user within the system.
9	Brochure, Catalog and Booklet	Tadawul able to do special printing for the client PoC.
10	Interoperability	No
11	Pricing	For issuing new cards the price is 25 LYD per card, and 3% per transaction. This is modifiable per contract with the client.
12	Data Storage	They have two data storage services at HQ, and one in Dubai.
Payment Product Details: End User (payee)		
13	Receipt of Funds	SMS message or Email can be added to the system.
14	Registration and Know Your Customer Requirements (end user account)	<ul style="list-style-type: none"> - ID, passport or any proof from official agency. - Mobile Number. - Know Your Customer (KYC) should include Central Bank of Libya (CBL) standards and Client standards.
15	Account balance and transaction volume limitations (End User Account)	Up to the client.
Distribution		
16	Coverage Area and Distribution network	2,000 PoS could be activated at any time, 230 active PoS in 5 cities.
17	Cash in/Cash out Liquidity Controls	Tadawul doesn't have Cash out for now, but they may be able to provide other solutions such as liquidizing money at their PoC.

Customer Service/Training: Corporate (payer)		
18	Training for staff	Not all staff training will be managed by Tadawul.
19	Technical Support/Service Level Agreements	Not all services will be managed by Tadawul.
19	Disbursement Troubleshooting	Yes, for all of Tadawul PoS holders.
Customer Service/Training: End User (payee)		
20	Training for end users (recipients)	Should be included in the contract.
21	Technical Support	Tadawul has a call center for the end User.
22	Recipient Troubleshooting	Tadawul has a call center for the end User as well as one customer services center in Tripoli, also for the end User.
Data Privacy/Security/Service Provider Internal Controls		
23	Security of Funds	Tadawul has international standards.
24	Data Security	Tadawul has international standards, including two data backups.
25	Data Privacy	Tadawul adhere to international standards.

General Information:

5. Can you please provide a **sample agreement** between parties? (Service Provider and Customer)?

No a sample agreement cannot be provided.

6. Please provide **any other services or products** that may reinforce your quote

No other services

Payment Product Details: Corporate

- How does an organization **verify** that the funds transmitted **reach the intended recipient**?
Daily, weekly, monthly reports.



- What are the **maximum/minimum amounts** of funds a corporate client can **disburse in a day**?
Up to the client, with monthly limit of 2,500 LYD for the end user.
- How **many transactions** can a corporate client **disburse in a day**?
It's open, and up to the client.
- What is **the clearing and settlement** process for payments?
Tadawul have different type of settlements, like providing liquidity for shops, providing other type of E-cards for shops to pay for their needs from the whole sale market etc..
- Are the **fees** for both **sending** and **withdrawing** funds visible when preparing for disbursal?
Yes and the amounts is up to the contract type between Tadawul and the Client.
- What is the **pricing structure** of your product?
It's a 3% per transaction.
- How **stable are the service provider and power networks**? May we see a copy of the **uptime records (for mobile payments)**?
From 3 to 10% failed transactions because of the Mobile network coverage.
- How many **transactions can an end user** account receive in a day?
Open

Data Privacy and Security/ Service Provider Internal Controls:

- How long does the payment service provider **keep accounting records** of transactions?
Up to client.

APPENDIX B: Regulations

A.2 Regulations Questionnaire		
Topic	Question	Response
Regulator	Which ministry or agency regulates financial service providers? List by financial mechanism, e.g. bank, mobile money, over-the-counter, remittance, etc.	Central Bank of Libya
	Which ministry or agency regulates mobile communications?	Ministry of Communication
	What ministry or agency governs e-money	Central Bank of Libya
General regulations	What regulation, if any, governs unit money laundering (AML) and/or counter-financing of terrorism (CFT)?	Central Bank Of Libya and Libyan Audit Bureau
	To whom or what functions does AML/CFT regulation apply?	Central Bank of Libya
	Who is allowed to issue e-money?	Central Bank of Libya
	What is the regulatory definition of e-money?	No regulations currently in place for e-money
	Is price transparency regulated?	Yes - through Ministry of Economy and implemented at local level by municipalities
	What types of entites may provide money transfer services?	Public and Private Banks; Private Companies; State telecommunication agencies;
KYC	What KYC/ID documentation is required to establish a bank account in a bank branch?	Libyan ID or passport; National ID Number or Foreign passport and Residency Permit
	What KYC/ID documentation is required to receive a remittance/payment	ID or passport; Foreign passport and Visa, or Residency Permit.
	What KYC/ID documentation is required to buy a prepaid instrument not linked with a bank account?	Libyan ID, passport, National number or Foreign passport and residency, other e.g. UNHCR registration number + Mobile number.
	What KYC/ID documentation is required to subscribe to a mobile telephone service?	Libyan ID, Passport and National Number or just Foreign Passport.

APPENDIX C: Stakeholders Matrix

No	Type of Agency	Agency	Where	Targets / Population	Delivery Mechanism (Aggregator, Bank, MFI, MNO, OTC, Remittance)	Website
1	GOV	Central Bank of Libya	Tripoli		Regulator	https://cbl.gov.ly
2	GOV	Moamalat Financial Services	Tripoli	Banks	- PoS, Local Cards and Prepaid Card, distribution system for electronic transactions.	https://moamalat.net/
3	GOV	Wahda bank	Benghazi	Individuals	(Cards)Moamalat providing: Local Card linked to Account for the Bank. (Mobil Wallet) Masarat: have working project with Wahda Bank, for Mobile wallet will launched in May and today they have more than 10,000 User.	http://www.wahdabank.com.ly/ar/
4	GOV	Jumhuriya bank	Tripoli	People	(Cards) Moamalat providing: Local Card linked to Account for the Bank. (Mobil Wallet) Masarat: have a pilot project with NAB, for Mobile wallet that will be launching soon.	http://www.jbank.ly/
5	GOV	National Commercial Bank	Al Bayda	Individuals	(Cards) Moamalat providing: Local Card linked to Account for the Bank. (Mobil Wallet) Masarat: have a pilot project with NAB, for Mobile wallet that will be launching soon.	https://ncb.ly/Default.aspx
6	GOV, Private	North Africa Bank	Tripoli	Individuals	Moamalat providing: Local Card linked to Account for the Bank. Tadawul: have a pilot project with NAB, for prepaid cards that will be launching soon. (Mobil Wallet)Masarat: have a pilot project with NAB, for Mobile wallet that will be launching soon.	https://nab.ly/
7	GOV	Sahara Bank	Tripoli	Individuals	(Cards) Moamalat providing: Local Card linked to Account for the Bank + prepaid Card.	https://saharabank.ly/
8	Private	Tadawul Company	Tripoli	Banks/Individuals	Assaray Bank: providing Prepaid Card for Tadawul.	http://tadawul.ly/
9	Private	Assaray Bank (ATIB)	Tripoli	Individuals	Local Card linked to Account.	http://assaraybank.com/retail-services/
10	GOV	Libyana Company	Tripoli	Individuals	Telecommunications provider	http://www.libyana.ly/
11	GOV	Almadar Company	Tripoli	Individuals	Telecommunications provider + mobile wallet in September	https://www.almadar.ly
12	Private	Miza Company	Tripoli	Individuals	Mobile wallet in November	
13	Private	Masarat Company	Tripoli	Banks	Working Mobile Wallet.	http://www.masarat.ly/
14	Private	NURAN Bank	Tripoli	Individuals	PoS, Local Card linked to Account	http://www.nub.ly/
15	Private	Bank of commerce and development	Benghazi	Individuals	Local Cards, Mobile Wallet linked to bank account holders.	www.bcd.ly
16	Private	Tafany	Tripoli	Individuals	PoS used for phone TopUp	https://tafani.ly/
17	Private	Umbrella	Tripoli	Individuals	Mobile money, not ready for this year.	www.umbrella.ly

APPENDIX D: Financial Service Providers List

Company	Type of Delivery Mechanism (Aggregator, Bank, MFI, MNO, OTC, Remittance)	Product Name	Location		Website
			State	District	

Sahara Bank	Bank/Debit Card /Pre-paid card Registered and they work with Bank License	Badil +	Libya	Tripoli + Benghazi	https://nab.ly/
Almadar	Mobile money Registered and they work with Mobile wallet License	Almadar Mobile Wallet	Libya	Unknown	https://www.almadar.ly
Miza	Mobile money Registered and they don't have License yet from CBL		Libya	Unknown	
Umbrella	Mobile money Registered and they don't have License yet from CBL	Icash	Libya	Unknown	www.umbrella.ly
Tadawul	Bank/Pre-paid card for banked and unbanked people. Registered and they work through "Saaray" Bank License and Top-up prepaid card License	Rasedi	Libya	Tripoli + Benghazi +Zliten +Khoms and Misrata	http://tadawul.ly/
Moamatat	Hawala/issuing all type of Cards Registered and they work with License from CBL	MoneyGram Local	Libya	All Libya	https://moamatat.net/
Wahda bank	Debit Card + Mobile Wallet Registered and they work with Bank License	Mobi Cash(Wahda Bank).	Libya	Benghazi for Mobile Wallet All Libya for debit Card	http://www.wahdabank.com.ly/ar/
Jumhuriya bank	Debit Card + Prepaid card Registered and they work with Bank License	Student Card	Libya	All Libya	http://www.jbank.ly/
National Commercial Bank	Debit Card Registered and they work with Bank License		Libya	All Libya	https://ncb.ly/Default.aspx
North Africa Bank	Debit Card Registered and they work with Bank License		Libya	All Libya	https://nab.ly/
NURAN Bank	Debit Card Registered and they work with Bank License	Rekaz	Libya	Tripoli center	http://www.nub.ly/
Bank of commerce and development	Mobile Wallet + debit Card Registered and they work with Bank License	Idfali/Kanzi	Libya	Benghazi and Tripoli	www.bcd.ly
Tafany	Pre-paid card Registered and they work with Top-up prepaid card License	Any	Libya	Tripoli (not yet active)	https://tafani.ly/
Masarat Company	Branchless + Mobile Wallet for individuals who do have or don't have bank accounts Registered, working with 5 Banks.	Mobi Cash(Wahda Bank), Mobi NAB, Mobi Mal, others	Libya	Benghazi for now but willing to scale up end expand	http://www.masarat.ly/

APPENDIX E: Financial Service Providers Comparison Table

No	Criteria	Data description	Moamatat	Tadawul	Masarat
1	Coverage of geography	% of geo coverage	Now working in Tripoli, and Benghazi and they could cover All Libya	Tripoli, Alkhomes, Zliten, Misrata, Benghazi	Now working in Benghazi, and they could cover All Libya
2	Coverage of population	% of pop coverage	More then 1,000,000	5000 in 4 months	Coordinating around 700,000 customer from 5 Banks for Mobile top-up and branchless serves , 10,000 for Mobi Cash serves in Benghazi with Wahda Bank

3	Number of Agents (national/geographic)	#	7 banks with their branches working in whole Libya	5 cities	5 banks with their branches working in whole Libya. And they have offices in 8 Cities, South, East, and West.
4	Number of Payment Points (national/geographic) PoSs	#	Active in Tripoli, some in Benghazi. But they have 1400 PoSs in whole Libya.	2000 PoSs in 5 Cities	40 PoSs in Benghazi, expanding everywhere in Libya, will take 2 months from the first payment, and this is up to the client needs.
5	Account capacity / registration	# of accounts	Unlimited	Unlimited	Unlimited
6	Daily Volume/Amount of transfer (system)	# of transfers/\$ of transfers / day	up to the banks, we will decide after we meet with the bank provider	Up to the client	Up to the client
7	Daily Volume/Amount of transfer (agent)	# of transfers/\$ of transfers / day / agent			
8	Cost of setup	\$ for equipment/hardware and technical support (services rates and fee structure)		The management under Tadawul. 3% from each transaction	All the management could be under the client control or Masarat depending on the client needs. Masarat plan for the setup + the technical support and training will be for free.
9	Cost of transfer	\$ for agency disbursement + withdrawal/use transaction	For E-cards: 20 LYD to issue the card, Up to the Bank. Withdraw = 2 LYD by each withdraw 30% for Moamatat, and 70% for ATM owner. PoS:- Food=1% Hotel=4% Pharmacy= 2.5% Butcher shop=2.5% Min =1% max=5% Hawala: 5LYD/ for any amount of money inside Libya.	For E-cards: 25 LYD to issue the card, Up to the Bank. 3% from each transaction	Free for UNHCR or their partners. For Wahda Bank in Benghazi: from 1% to 4% from the customer, 1% to 3% from the shop. (e.g. food = 1% from customer 1% from the shop)
10	Training for implementer	Y/N	Y	N	Y
11	Training for recipients	Y/N	Yes, up to the contract	Yes, up to the contract	Yes, up to the contract

1 3	System setup time	DD/MM to set-up delivery mechanism platform	1 to 2 months	3 weeks to 1 month	Up to the area that client want to cover and the type of contract. For Benghazi less than a month, for all of Libya will take around 2 months from the first payment.
1 4	Beneficiary Registration time	DD/MM to 1) verify beneficiary lists w account registration / 2) register new beneficiary accounts (inc activation?)	less than month	it's already working, so the client won't have separated system	less than a month
1 5	Compliant with donor / agency policies	XXX Minimum Reqs/Standards Y/N Checklist?	Flexible, it could be customized up to the client need	They are working within the Libyan rules and regulation and it could be customized up to the client needs.	Flexible, it could be customized up to the client need
1 6	Reporting requirements	XXX Minimum Reqs/Standards Y/N Checklist? E.g. real-time; payment status (failed transfers); status of funds (account balance)	Up to the client need, they have many reporting type, E.g. real-time; payment status (failed transfers); status of funds (account balance), AML.	Daily, weekly, monthly reports, could show all the information that the client wants.	Up to the client needs, they have many reporting type, E.g. real-time; payment status (failed transfers); status of funds (account balance) etc.. AML, Miss use monitoring tools.
1 7	Capacity - Branches	Number of Offices/Branches	All Libya, consumer will deal with one of the banks	Tripoli,	All Libya, consumer will deal with one of the banks
1 8	Cost - System fee	Network Charge	SMS notification cost	SMS notification cost	SMS notification cost
1 9		Cash-in/cash-out amount per month	Cash in is Open Up to the Banks, area, and situation.	Cash in 2500/ month No Cash out, But they could add it.	Up to the client. In Benghazi 5000/ day, 10000/ week
2 0		Transactional Limit at Branch & ATM	In Tripoli they could set ATMs for the client Use	No ATMs, but PoSs could work as ATMs.	No ATMs, but PoSs could work as ATMs. Or they could create solution for the client.
2 1		Person to Person Transfer per day	No	No	Yes, if the client wants.
2 2	Account - Requirement - Balance (daily/flat?)	Minimum balance	No	No	No

2 3		Bill and merchant payments (cost to customers)	from the PoSs and the statement	from the PoSs and the statement	from the PoSs and the statement, and if the client wants they could provide price monitoring, and real time calculator for Minimum Expenditure Basket
2 4		Timing of Disbursement	one to two days	real time	real time
2 5		The service supplier is registered and part of an approved financial arrangement	Yes	Yes	Yes
2 6		The service supplier is able and willing to customize and develop necessary services	Yes, flexible	Yes, up to the system limits	Yes flexible
2 7		The service supplier has experience in delivering payments to humanitarian and development programme recipients, social assistance, pensions, salaries etc.	No, but it could be done	No, but it could be done	No, but it could be done