



Digital Financial Services Price Transparency and Awareness in Malawi

A whitepaper commissioned by the Digital Financial Services Coordinating Group and prepared by MM4P

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About MM4P

MM4P is a programme launched by UNCDF in partnership with the Swedish International Development Agency (Sida), the Australian Department of Foreign Affairs and Trade (DFAT), the Bill & Melinda Gates Foundation and the Mastercard Foundation. MM4P provides support to digital financial services (DFS) providers in a selected group of LDCs to demonstrate how the correct mix of financial, technical and policy support can build a robust DFS ecosystem that reaches low-income people in LDCs. MM4P is currently engaged in eight LDCs: Benin, Lao People's Democratic Republic, Liberia, Malawi, Nepal, Senegal, Uganda and Zambia, each of which offers unique opportunities and challenges.

In 2011, UNCDF-MM4P conducted a scoping exercise in Malawi to determine the feasibility of supporting the development of the country's DFS.^a The MM4P programme launched in Malawi in 2012, and it has since played a key role in developing the ecosystem and increasing usage of DFS in the country. These results have been achieved by, among other things, supporting the Reserve Bank of Malawi, both mobile network operators (Airtel and Telekom Networks Malawi [TNM]) and several banks and microfinance institutions in reaching their digital finance goals. The programme also signed an agreement with the United States Agency for International Development (USAID) in 2014 and supported the transition of government payments from cash to digital format in cooperation with the Better Than Cash Alliance by, inter alia, facilitating the development of a Government Payments Roadmap. Since then, the market has grown significantly and is now shifting from Start Up phase to Expansion phase.^b In December 2016, there were 3.4 million customers with a registered DFS account in Malawi, of whom 1.8 million were active users.^c This finding corresponds to 19 percent of the adult population actively using DFS.

About the Digital Financial Services Coordinating Group (DFSCG)

The Mobile Money Coordinating Group (MMCG) was formed to support the implementation of a Mobile Money Action Plan developed by USAID in 2011 and to promote broad uptake and usage of mobile money in Malawi. At the time of its creation, the Reserve Bank of Malawi, USAID and the World Bank comprised the group's leadership core, with other members coming in from key sectors or organizations, including the Bankers Association of Malawi, the Ministry of Finance, Economic Planning and Development, mobile network operators (Airtel and TNM) and UNCDF.

MMCG has since evolved to hold a wider membership base that includes commercial banks and other relevant stakeholders. Shifting the group to accommodate a wider stakeholder group, rather than limiting it to mobile money providers, necessitated a name change from MMCG to Digital Financial Services Coordinating Group (DFSCG). Current membership includes the following: Airtel, Bankers Association of Malawi, FHI360/USAID Feed the Future Malawi Mobile Money, Financial Sector Technical Assistance Project, Malawi Communications Regulatory Authority, Malawi Microfinance Network, Malawi Posts Corporation, Ministry of Finance, Economic Planning and Development, NBS Bank, Opportunity International Bank Malawi, Reserve Bank of Malawi, TNM and UNCDF.

^a Digital financial services (DFS) can be defined broadly as financial services that are delivered through electronic channels that include but are not limited to mobile phones and point-of-sale devices.

^b The UNCDF-MM4P theory of change in the roll-out of DFS in a country assumes that the market shifts between stages of development, from Inception to Start Up to Expansion and eventually to a mature and Consolidated market. The Expansion phase is characterized by a reliable and interoperable infrastructure, fast-growing agent networks, development of partnerships, and a wider range of products being offered through electronic channels.

^c Active users are defined as the number of people, at a given point in time, who have accessed financial services using electronic channels at least once in the preceding 90 days.

Malawi project team

This whitepaper outlines major findings of a diagnostic exercise conducted by the MM4P team in August 2017. This exercise involved desk research and an in-country mission to gather data, conduct interviews with agents, tellers and customers, and survey the insights of local stakeholders. The following project team members authored the report:




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Contents

- 1 Introduction
 - 2 Key research questions
 - 2 Key findings
 - 8 Recommendations
 - 9 Conclusion:
-

List of figures and tables

- 3 **Figure I:** Example tariff poster of a ZoonA agent
 - 6 **Figure II:** Comparison of transaction charges for five providers in Malawi (MK)
 - 7 **Figure III:** Comparison of transaction charges for 10 mobile network operators from Malawi, United Republic of Tanzania, Zambia and Zimbabwe (US\$)
 - 7 **Figure IV:** Comparison of transaction charges for four over-the-counter providers from Malawi and Zambia (US\$)
 - 5 **Table 1:** Example transaction fees paid for one or two transactions of the same total amount
-

List of acronyms

DFS	digital finance service(s)
DFSCG	Digital Financial Services Coordinating Group
LDC	least developed country
MK	Malawian kwacha
MMCG	Mobile Money Coordinating Group
MMO	mobile money operator
MNO	mobile network operator
OTC	over the counter
PIN	personal identification number
SMS	short message service
TNM	Telekom Networks Malawi
UNCDF	United Nations Capital Development Fund
US\$	United States dollar
USAID	United States Agency for International Development

Introduction

While traditionally considered an issue relevant to consumer protection and market conduct, the lack of pricing transparency of digital financial services (DFS) can hinder adoption and usage of digital financial products and services as customers will focus on what they have been ‘traditionally’ accustomed (i.e., cash or the use of alternative rudimentary ways to transfer money). Where consumers have difficulty understanding or accessing the price of products, they are unlikely to use the products and may be restricted in their ability to compare the offers available in the market across various providers. This situation may limit the uptake of DFS if customers (incorrectly) perceive the products as too expensive and could as well result in a lack of competitive pressure on providers to offer value for money and innovative products and services. Price transparency is therefore important for ensuring effective financial inclusion and competition. It is also a basic aspect of most DFS providers’ internal compliance for agents/outlets, so it is critical to understand whether or not relevant rules are being followed.

In Malawi, the Digital Financial Services Coordinating Group (DFSCG) Annual Workplan, developed by MM4P and approved by DFSCG members, included the development of a whitepaper on a topical DFS industry issue. At its Q1-2017 meeting, DFSCG identified the need for transparency and consumer awareness of transaction costs as one of the barriers for adoption of DFS in the country and thus agreed to develop this whitepaper on ‘Digital Financial Services Price Transparency and Awareness in Malawi’.

The key objectives of this whitepaper are the following:

- Review, summarize and compare the transaction costs to customers of five key DFS providers (Airtel, NBS Bank, Opportunity International Bank Malawi, Telekom Networks Malawi [TNM] and Zoona).
- Compare the transaction costs to those of other regional DFS providers.
- Interview agents, tellers and customers in urban, semi-urban and rural areas to better understand levels of awareness of DFS and their pricing.
- Highlight challenges and issues related to consumers’ awareness of DFS and their transaction costs as well the related impact on adoption and usage of DFS in Malawi.
- Make recommendations to stakeholders on how to increase effective and meaningful awareness of transaction costs by consumers to drive adoption and usage of DFS in Malawi.

Preparation of this whitepaper involved over 60 interviews. Interviewees included agents and tellers¹ of the five providers, staff members of the providers, members of DFSCG and staff members of the National Payments System and Consumer Protection Departments of the Reserve Bank of Malawi.

It is important to acknowledge the difference in business models from each of the provider types as these business models form the basis for the value proposition to the targeted customer and ultimately the pricing adopted by the provider.

With that in mind, this whitepaper takes into consideration several factors in its comparison of transaction costs both within Malawi and across the region:

¹ A teller is an employee of a mobile money agent who conducts transactions with customers. These transactions usually include cash-in/cash-out transactions as well as mobile money registrations in some cases.

- i. Mobile network operators (MNOs) use a person-to-person business model, which involves sending money between wallets without the intervention of agents.
- ii. Over-the-counter (OTC) providers offer transfers that do not involve the use of wallets, and the transactions are facilitated by agents.²
- iii. Agency banking involves the use of agents to deposit or withdraw funds from customers' bank accounts.

Key research questions

To achieve the objectives of this whitepaper and to understand the impact of DFS price transparency on product uptake in Malawi, the research was framed by the following questions:

- **Question #1:** What is the level of DFS pricing awareness in Malawi? And is it consistent in both urban and rural areas?
- **Question #2:** Are DFS customers aware of DFS transaction charges? Is DFS pricing awareness a barrier to adoption or usage of DFS in Malawi?
- **Question #3:** Does DFS pricing in Malawi differ significantly across different DFS providers (banks, telcos, mobile money operators [MMOs])?³ How does the DFS pricing in Malawi compare to other Southern African countries?

Key findings

Question: What is the level of DFS pricing awareness in Malawi?
And is it consistent in both urban and rural areas?

#1

In several DFS deployments, price transparency has played a critical role in the adoption and usage of DFS and, more importantly, in the transition of users from their regular money transfer services to the adoption and regular use of digital financial solutions. The authors' experience of DFS in several markets indicates that price transparency is a crucial element of a market as it could be a potential barrier to entry for consumers. As more sophisticated and complex products such as credit, savings, insurance and securities are delivered via mobile money, DFS price transparency will only become more important.

² Over-the-counter (OTC) transactions are those in which a sending customer provides funds to an agent who conducts an authorized transaction to a non-wallet user (typically using a phone number and a national identity card for proof of identity).

³ When the authors refer to MMOs, they are speaking of all mobile money operators—MNOs and third-party providers/OTC providers.

Figure 1
Example tariff poster of a Zoona agent

SEND Ukatuma	CHARGE Imitango
K 1 - K 30	K 5 K 2
K 31 - K 50	K 5 K 4
K 51 - K 100	K 10 K 8
K 101 - K 200	K 20 K 15
K 201 - K 300	K 30 K 25
K 301 - K 400	K 40 K 35
K 401 - K 500	K 40 K 40
K 501 - K 750	K 55 K 45
K 751 - K 1 000	K 55 K 55
K 1 001 - K 5 000	K 100 K 100

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The authors' research in Malawi revealed that pricing transparency requirements for DFS are currently partially met across providers, with almost all agents/tellers clearly displaying tariff posters at outlets and being able to accurately identify the transaction costs per transaction tier. It is important to note that all the agents/tellers who were interviewed were aware of the transaction costs and readily and accurately advised customers of them. Ninety-seven percent of these agents had tariff charts visibly displayed at their locations (see figure 1 for an example). All interviewed agents confirmed that providers used a mixture of different tools to communicate prices to customers as part of the on-boarding process:

- **Tariff posters** set up at each agent outlet/location. This tool was the primary source of information for both customers and agents/tellers. Eighty-four percent of outlets surveyed had updated tariff posters clearly visible to customers.
- **Fliers.** All Zoona agents had fliers that could be given to customers to convey transaction charges. Less than 30 percent of the rest of the providers had fliers specific to transaction charges.
- **Short message service (SMS) blasts** to customers. It is important to note that, even though they received SMS, customers still referred to agent premises for price changes. Fifty percent of customers interviewed highlighted that they had received information about tariffs this way.
- Updates by providers on their **websites**, sharing transaction cost information for customers. However, it is important to consider that none of the customers interviewed referred to the website as a source of information on transaction costs.

Both agents/tellers and customers were aware of the tariff posters, fliers and SMS options of communication regarding transaction costs/changes, and these means seemed sufficient for the communication of transaction costs when they were correctly placed at agent premises. **With that in mind, the most effective medium of communicating transaction costs was through the agent.** All transactions observed during the research included the customer asking the agent/teller for the cost of sending a specific amount of money, even when tariff posters were clearly visible to the customer, and a subsequent dialogue between them about pricing. In all cases, the discussion was focused on the agent/teller confirming how much it would cost the customer to send the money if he/she wanted the recipient to receive a specific amount of money.

Therefore, even though tariff posters and fliers kept the agent/teller 'honest' in their communication of transaction costs, customers were generally comfortable with and trusted the costs communicated by the agent/teller. This finding was consistent in both urban and rural areas. In rural areas, the engagement between customers and agents was more pronounced, as several agents reported that the majority of customers were illiterate and would always ask for confirmation of transaction costs even when tariff posters were visibly displayed at agent locations.

Interviews were conducted with 50 agents/tellers and 20 customers. In some cases, customers and agents were interviewed together (at the point of transaction). Even though the initial perception among DFSCG members was that pricing transparency was a barrier to adoption and usage, the authors discovered that there was a significant difference in this hypothesis when urban/semi-urban areas were compared to rural areas:

⁴ Formal OTC is the number of people who complete a money transfer without a registered account. It is considered a leading indicator and tracks a population who might easily be converted to having an account. In contrast, informal OTC is the number of people who ask an agent to directly top up another registered account holder's account in a bid to avoid the person-to-person transfer cost.

- **Urban/Semi-urban areas:** Seventy percent of customers observed in urban and semi-urban areas were aware of the transaction costs. This finding is largely due to the fact that most interviewed agents reported that an average of 7 out of 10 transactions were informal OTC.⁴ Thus, customers always asked for the cost of withdrawing the funds for the recipient to receive a specific amount of money.
- **Rural areas:** All of the agents interviewed in rural areas reported that customers always asked for confirmation of transaction charges before completing the transaction. This finding was consistent with the 50 percent of agents who had tariff charts visibly displayed at their locations. The need for consistent confirmation of transaction charges was attributed partly to illiteracy levels in rural areas. The finding was further confirmed by the high levels of 'agent-assisted' transactions. Agent-assisted transactions are those in which a customer gives an agent his/her phone and asks him/her to conduct the transaction on his/her behalf. In some cases, the customer also shares his/her personal identification number (PIN); in others, the customer asks to input the PIN him/herself. Interviewed agents in rural areas reported as high as 6 out of 10 transactions (i.e., withdrawal and sending of money) were conducted with the assistance of the agent. While 65 percent of customers interviewed in rural areas reported that price was a key consideration for the choice of DFS provider, they also acknowledged the importance of other factors, especially agent liquidity and network downtime, in their provider decision.

Question: Are DFS customers aware of DFS transaction charges? Is DFS pricing awareness a barrier to adoption or usage of DFS in Malawi?

#2

To understand the impact of limited transparency of transaction costs for mobile money, it is important to assess how price aware and price sensitive consumers are. Interviews with providers revealed that both Airtel Money and Zoona had made price changes in the last 12 months. These price changes were largely reductions, from a reduction of 2 percent by Airtel Money to as high as 85 percent for Zoona.⁵ Yet, the changes did not yield a corresponding increase in adoption by new users. There was, however, an increase in usage among existing customers. This increase in usage by existing customers as well as an increase in people who signed up to become agents were reported by all providers that made price changes.

Communication of these price changes was made through similar channels (i.e., SMS blasts to the customer base, fliers and posters at the respective agent locations). Even with these channels, one-on-one engagement with the agent seemed to be the most effective means of communication of prices and any changes related to pricing. Fifty-eight percent of agents interviewed said that the majority of customers who transacted at their locations always asked for clarification of transaction costs before each transaction.

Reports from providers that carried out price changes highlighted two key points in relation to price sensitivity of customers:

- 1. Different customers, categorized as medium- to high-income customers and low-income customers, have varying sensitivity to price.** While interviews with providers showed that there was an increase in usage among existing mobile money users resulting from price reductions, interviews with agents and customers revealed that low-income customers were breaking up transactions as it was cheaper to conduct two smaller withdrawals as compared to one large-value withdrawal for specific tiers. For example, instead of conducting one withdrawal transaction of MK40,000 (US\$55), for a cost of MK1,900 (US\$2.62), a low-income customer would typically make two withdrawal transactions of MK20,000 (US\$28), for the cost of MK755 (US\$1.04) each and a total cost of MK1,510 (US\$2.08)—in other words, the customer would spend MK390 (US\$0.54) less on two transactions than for just one transaction at a higher tier (see table 1).⁶

⁵ See also <http://www.times.mw/zoona-reduces-charges-by-85/>

⁶ Conversion rate: MK1 = US\$0.001378421 (Source: <https://treasury.un.org/operationalrates/OperationalRates.php>, October 2017). Note: This rate is used throughout this document when United States dollar (US\$) equivalents are provided for Malawian kwacha (MK).

Table 1

Example transaction fees paid for one or two transactions of the same total amount

Withdrawal of a total MK40,000 (US\$55)	Fee (MK)
Single withdrawal of MK40,000 (US\$55)	1 900 (US\$2.62)
Multiple (2) withdrawals of MK20,000 each (US\$28)	1 510 (US\$2.08)
Difference (revenue loss)	390 (US\$0.54)

2. Agent liquidity and network downtime are more important than pricing for customer adoption and usage.

The customer needs to understand the value of the product and, in particular, to trust in the technical stability of the system and the liquidity of the agents. All Zoona customers who were interviewed said they preferred to use Zoona when sending higher value amounts because they trusted the liquidity of Zoona agents. Thirty-eight percent of agents interviewed mentioned network downtime as an issue; agents identified network downtime particularly for accessing and transacting on the TNM Mpamba platform as a barrier to adoption of the service, even though it was cheaper than Airtel Money.

These findings highlight the need for providers to leverage agents as a channel for consumer education and awareness of transaction costs and even new products. For example, 70 percent of agents interviewed said that customers always seek clarification of transaction charges before transacting.

The survey conducted for this whitepaper also confirmed that, even though it was previously occurring, agents were no longer charging fees OTC as both Airtel and TNM had penalized several agents in the past year who had been reported by customers to have been charging them outside the system.

#3

Question: Does DFS pricing in Malawi differ significantly across different DFS providers (banks, telcos, MMOs)? How does the DFS pricing in Malawi compare to other Southern African countries?

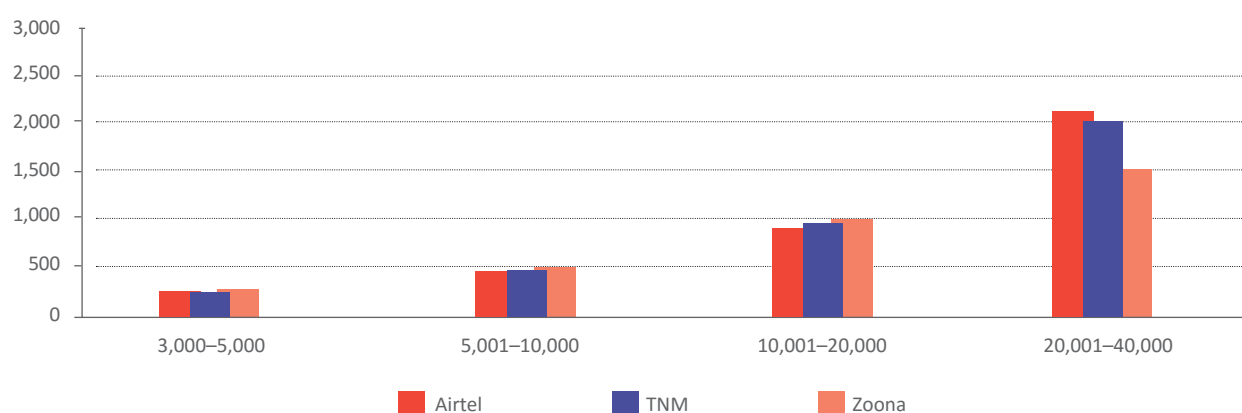
The first objective of this paper was to understand transaction costs of different DFS providers, in Malawi and across the region. To achieve this objective, the authors looked at transaction costs for withdrawal fees, given that all deposits into customers' accounts—whether mobile money wallet or bank account and whether in an urban or rural area—were free of charge; there was no indication of any customers being charged for deposits into their accounts. This finding did not include Zoona, which is currently only offering money transfer services (no deposits into wallets).

For the purposes of this study, then, the authors used transaction tiers for withdrawal amounts equivalent to MK3,630–MK36,297 (US\$5–US\$50), since these bands represent more than 80 percent of total transactions for MMOs in Malawi. To achieve like-for-like comparison, the transaction charges for Zoona (OTC) were compared to the total fees to send money (person-to-person) and withdraw money for the MNOs.

The authors' analysis had the following results (also illustrated in figure II):

- **Money transfer providers were largely on par with each other.** The three money transfer providers (i.e., Airtel Money, TNM and Zoona) were on par with each other in the money transfer (and withdrawal) charges, with Zoona being marginally more expensive than the MNOs in the lower tiers and considerably cheaper in the higher transaction bands.
- **NBS Bank was the cheaper of the two agency banking providers.** However, this situation introduced un-even charging benefits to customers transacting different value amounts. For example, the cost of withdrawal (flat rate of MK150, or US\$0.21) would be much cheaper for a customer withdrawing MK10,000 (US\$14) compared to another customer withdrawing a lower value amount like MK500 (US\$0.69). This state of affairs is likely to cause less willingness by NBS Bank agents to conduct higher value transactions since the agents do not earn as much from the transaction as compared with other providers, even when compared to other MMOs.
- **Banks were less expensive than MMOs across all four tiers that were compared,** which can partly be attributed to the difference in the business models of banks and MMOs. Banks benefit more from increasing deposits through agency banking and, as a result, have minimal charges on transactions. MMOs generate most of their revenue from transactions and therefore charge more than banks on transactions. It is important to note, however, that this situation also affects the profitability of bank agents compared to MMO agents. Since banks have lower deposit and withdrawal transaction charges, they have fewer fees from which to pay agent commissions; hence, agency banking commissions are lower than commissions paid by MMOs. Four of the six bank agents interviewed said this issue was affecting how much they invested in agency banking.

Figure II
Comparison of transaction charges for five providers in Malawi (MK)



Note: Charges include 'send money and withdrawal' fees.

Figures III and IV compare the transaction charges for MNOs and OTC providers, respectively, across the region. For purposes of consistency, the comparison considered the cost of sending and withdrawing the equivalent of US\$20 by different providers.⁷

Specifically, figure III compares person-to-person as well as cash-out fees of 10 providers from Malawi, United Republic of Tanzania, Zambia and Zimbabwe while figure IV compares transaction fees from four OTC providers in Malawi and Zambia.

⁷ The conversion rates used meant that US\$20 was equivalent to T Sh44,892 (Tanzanian shillings), MK14,510 (Malawian kwacha) or K192 (Zambian kwacha) (Source: <https://treasury.un.org/operationalrates/OperationalRates.php>, September/October 2017).

Figure III
Comparison of transaction charges for 10 mobile network operators from Malawi, United Republic of Tanzania, Zambia and Zimbabwe (US\$)

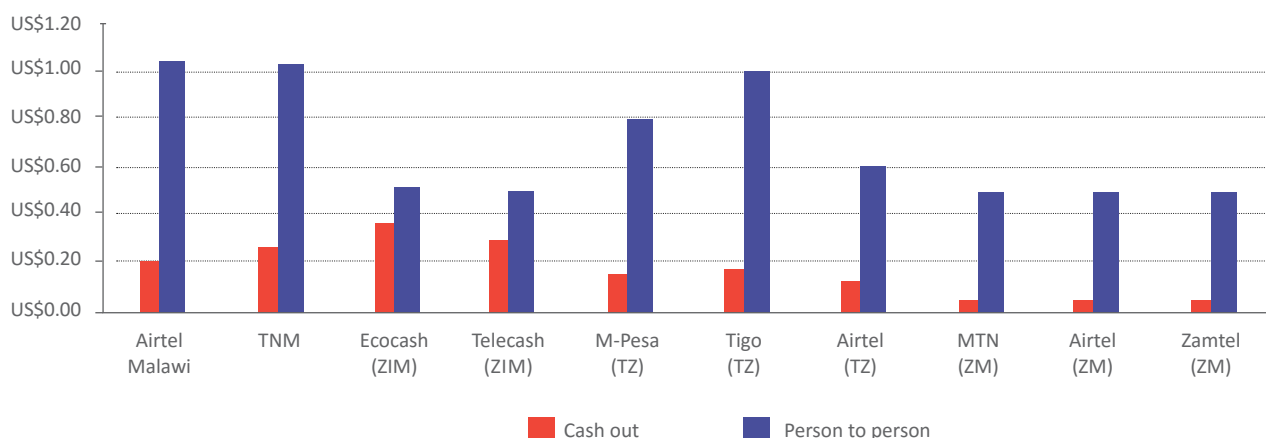


Figure IV
Comparison of transaction charges for four over-the-counter providers from Malawi and Zambia (US\$)

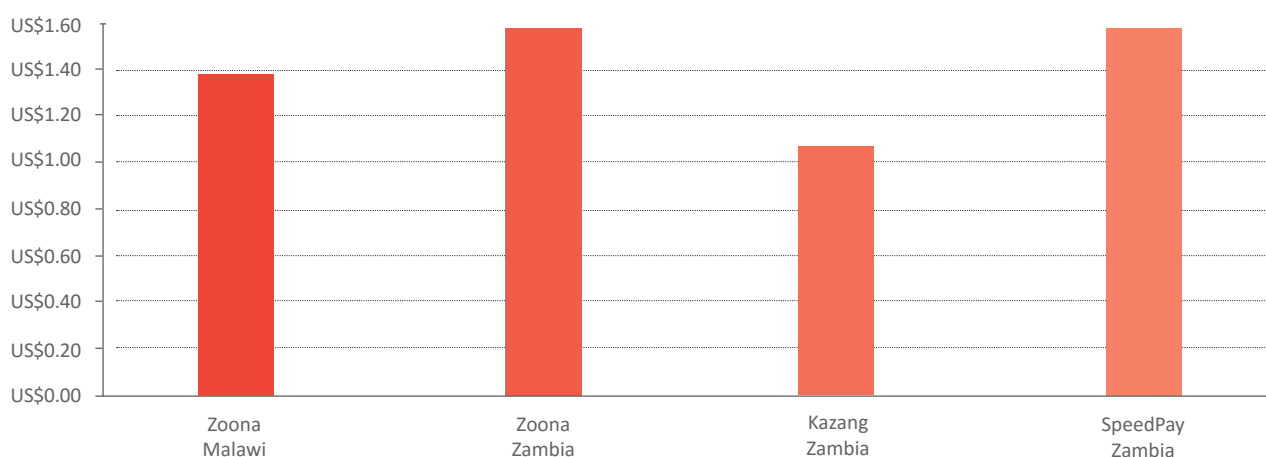


Figure III shows that transaction charges among MNOs were highest in Malawi and the United Republic of Tanzania. Figure IV reveals that OTC transaction charges among OTC providers were on par with providers in Zambia. It is important to note, though, that the comparison among transaction costs of providers from different countries was done mainly for transaction cost comparison. This study did not explore the impact of the difference in pricing among providers nor did it explore the transparency of DFS pricing in the countries shown in figures III and IV.

Even though this study's primary focus was DFS pricing transparency and awareness, it is important to highlight the significant number of agent-assisted or informal OTC transactions among MNO customers. Agents who were interviewed reported that an average of 7 out of 10 transactions were 'direct deposit' transactions into the recipients' accounts, making it a significant area of revenue leakage for the MNOs.

In rural areas, interviewed agents highlighted that more than 6 out of 10 transactions were agent-assisted transactions—transactions in which agents were asked by customers to conduct transactions on their phones. In some cases, customers entrusted agents with their PINs to complete these transactions.

Recommendations

This report indicates that while the DFS providers have made tremendous efforts in the transparency of transaction costs, especially in urban and peri-urban areas, pricing transparency in rural areas remains lower than in urban areas, with only 50 percent of agents visibly displaying tariff charts at their locations. The report highlights **five main recommendations** on which providers will either need to focus or complete more research in order to accelerate adoption and usage of DFS in an effective, inclusive and financially viable way. These initiatives should be viewed as sequenced steps on the roadmap to government payment digitization:

- 1. Better leverage agents as ‘agents of change.’** The research revealed that almost 70 percent of customers seek clarification of transaction costs before actually transacting. This pattern was significantly greater in rural areas, where there are higher levels of illiteracy. Incentives for agents that are focused on acquisition and product education to drive first time usage can be explored by providers along with other below-the-line activities.
- 2. Review several transaction tiers.** The findings demonstrated that the providers, particularly Airtel Money and TNM, might need to review the transaction tiers of MK10,001–MK20,000 (US\$14–US\$28) and MK20,001–MK50,000 (US\$28–US\$69), as they may be a source of significant revenue leakage. Agents reported customers breaking up transactions to ‘beat the system’ and pay less in transaction fees.
- 3. Further investigate informal OTC/agent-assisted transactions as an area of revenue leakage and potential fraud/money laundering.** More than 70 percent of agents interviewed said that they are engaged in informal OTC transactions. These agents reported that an average of 7 out of 10 transactions are informal OTC (also referred to as direct deposits in some markets). This situation presents an additional area of revenue leakage for MNOs and a fraud/money-laundering risk, since providers are unable to identify the actual sender of the money.
- 4. Review agency banking transaction charges.** While agency banking tariffs are affordable for customers, there is a need to review the charges or commissions paid to bank agents for transactions. Commissions earned by bank agents currently do not adequately incentivize high-value transactions, as reported by 65 percent of bank agents, which could result in agents not having adequate liquidity to support high-value transactions or breaking up high-value transactions into multiple low-value transactions to earn more commissions.
- 5. Consider that the high level of informal OTC transactions indicates that most customers are currently using DFS mainly for the purposes of sending money.** There is a need for providers to educate customers on the additional value and relevance of DFS to their needs, wants and aspirations. Current usage trends revealed that customers mainly use DFS as a solution for sending money. With improved and more targeted communication strategies, providers can reach the intended audience.

Conclusion

Toward a price transparent digital finance ecosystem

While this study was commissioned to investigate the level of DFS price transparency among customers, agents and tellers, it revealed that there is adequate visibility of transaction costs at agent premises though customers are heavily reliant on agents for confirmation of the charges incurred in all the transactions they conduct at agent points.

This study also illustrated that there are several key factors, other than price, that influence the customer's choice to use DFS or to not use DFS and, when a customer does use DFS, which provider he/she uses.

To drive adoption and usage of DFS in Malawi, providers need to take an ecosystem approach that includes addressing low levels of customer awareness, tackling issues that face agents in terms of access and spread as well as liquidity, and dealing with service downtime and transaction charges.

Another key insight of the research was that customers' perception and usage of DFS could be significantly dependent on the level of trust they have in agents. Most customers who were surveyed reported seeing agents as a trusted source of information regarding transaction costs as well the reliability of the providers. This situation presents an opportunity on which providers may capitalize by providing more support to agents in the form of training in the agent business, access to tools that make agent work more efficient, and incentives targeted at improving onboarding, enhancing agents' financial literacy, and building agents' capacity to provide necessary customer support.

The perception of DFS pricing by customers, the public, regulators and policymakers, donor agencies and other stakeholders is an important aspect to consider in efforts to develop the Malawian DFS market. An appreciation by these stakeholders of DFS pricing and the underlying factors that determine pricing is critical for buy-in and support. Overall, a more price transparent DFS ecosystem, even though it should not be seen as the single driver, could impact the level of financial inclusion in Malawi for the benefit of all stakeholders involved.

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