

Notes on Regulation of Branchless Banking in Pakistan

June 2007

Pakistan's government has made expanding access to finance a key policy priority. During the first of seven planned "rapid fire" diagnostic assessments, the Consultative Group to Assist the Poor (CGAP) found policy makers already attuned to some of the ways in which information and communications technology and new branchless banking models might be used to reach massive numbers of presently unserved poor people. Moreover, they are open to regulatory change to make this possible. Industry players, too, particularly mobile network operators, see the enormous potential of branchless banking as a profitable value added service.

But the challenges to branchless banking posed by current regulation in Pakistan are also formidable. To address these, while paying due regard to the new and enhanced risks that branchless banking can carry, a committee has been assembled involving financial system and telecommunications policy makers and industry representatives. Moreover, the central bank in close consultation with the industry has started exploring legal and regulatory adaptations to facilitate branchless banking. As a result of this work, some potentially viable paths are already emerging.

These notes offer details on what the CGAP branchless banking diagnostic assessment found in Pakistan. Over the coming weeks further "**CGAP Notes on Branchless Banking Regulation**" will be released, detailing our findings and observations on this important topic in Kenya, South Africa, Philippines, India, Russia and Brazil.

BACKGROUND: CGAP, BRANCHLESS BANKING AND THIS SERIES OF POLICY DIAGNOSTICS

CGAP is a global resource center for microfinance standards, operational tools, training, and advisory services. Its members – bilateral, multilateral, and private donors – are committed to building more inclusive financial systems for the poor. The CGAP Technology Program is a multi-year learning initiative co-funded by the Bill and Melinda Gates Foundation to find and test promising technology solutions to improve access to finance.

Branchless banking is defined as the delivery of financial services outside conventional bank branches using information and communications technologies and non-bank retail agents. Because of their potential to radically reduce the cost of delivery and increase convenience for customers, branchless banking approaches can expand coverage to new, previously unserved segments of the population. Technology can help a range of market actors to push the boundaries of access to finance, including not only banks but also microfinance institutions, mobile phone operators and technology companies.

Two models of branchless banking can be distinguished. Both make use of non-bank retail agents such as merchants, supermarkets or post offices to deliver financial services outside traditional bank branches. In the **bank-led model**, a licensed financial institution delivers financial services through a retail agent, who is equipped to communicate directly with the bank, typically using either a mobile phone or a point of sale terminal. The customer account is maintained with the bank, but is operated through the agent. In the **nonbank-led model**, a firm such as a mobile operator or prepaid card issuer makes use of retail agents to offer customers e-money accounts. Clients exchange their cash for e-money stored in a virtual account on the non-bank's server. The balance in the account can be used for making payments, storing funds for future use or converting back to cash at agents. Commercial banks may be used by the non-banks to hold the net proceeds of 'e-money' issued by the non-bank.

1. Introduction

From January 17 to 27, 2007, CGAP conducted a mission in Pakistan¹ to analyze the policy and regulatory environment for branchless banking. This document summarizes CGAP's initial findings.² It is based on a thorough analysis of existing and upcoming legislation relevant to branchless banking approaches and on the CGAP team's insights from 37 interviews with 62 representatives of a wide range of stakeholders. Interviews were conducted with the State Bank of Pakistan (SBP), the Securities and Exchange Commission of Pakistan (SECP), the Pakistan Telecommunication Authority (PTA), the Ministry of Finance (MoF), the Ministry of Information Technology (MoIT), commercial and microfinance banks, microfinance institutions (MFIs), the Pakistan Post, mobile network operators, technology firms, donor agencies, and other knowledgeable parties (list of persons interviewed is appended to this document).³

Pakistan - Highlights

- Improving poor people's access to financial services is a priority for the Government of Pakistan; both SBP and MoIT support opening up space for branchless banking.
- Mobile operators and at least one microfinance bank (MFB) and one MFI are keen to experiment with branchless banking. Few commercial banks have shown interest in pursuing this.
- Cash handling by agents does not appear to be permitted for any type of institution. Several changes to laws and regulations could remedy this.

Pakistan was selected as the pilot for a series of diagnostics in seven countries⁴ because regulators and policymakers there are keenly interested in branchless banking and several private operators (banks and mobile network operators) in Pakistan are exploring various business models.

2. State of Play: Government Authorities

Improving poor people's access to financial services is a top priority for the Government of Pakistan. Branchless banking models are recognized as one way to increase access, despite the fact that most government authorities have only recently started considering legal and policy implications of these new models. Awareness of branchless banking models has increased considerably as a result of a well-attended workshop in November 2006. At this workshop, Globe Telecom, the second largest mobile network operator in the Philippines, presented its G-Cash model. After this workshop, MoIT and SBP formed the MoIT-State Bank Joint Committee for Improvement of Access to Financial Services, chaired by MoIT. Among other things, the Terms of Reference for this committee call for research into m-banking and micro-payment systems.

The committee is a readily available vehicle for communications among various

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governmental stakeholders and the industry. It would be helpful to **make the committee even more inclusive** by including departments from SBP (such as the Payment Systems Department and the SME & Microfinance Department) that are not yet represented on the committee and some mobile network operators and MFBs that are interested in m-banking. (To date, only commercial banks are represented from the industry side.)

The committee's stated ends would be best served by pursuing the **opening up of appropriate regulatory space for a range of both bank- and telco-led models and combinations of models**, thereby permitting innovation to emerge from the most motivated market sectors. Openness to innovation may result in multiple models of delivery and, in turn, more clients being served. This approach was the subject of discussions at an April 30, 2007 Roundtable on Regulation of Branchless Banking held at SBP and co-sponsored by SBP, MoIT, the Pakistan Microfinance Network (PMN) and CGAP.

Both SBP and MoIT want to promote branchless banking models. SBP is **prepared to support necessary legal and regulatory adaptations** to facilitate branchless banking, but it also will consider any risks that might arise from these models. If it is necessary to amend existing or draft legislation (as opposed to amending only SBP regulations), MoF has expressed its support. Moreover, MoIT is keenly interested in learning from international experience with branchless banking.

SECP, as the regulator of non-banking finance companies, insurance companies, and some MFIs (Section 42 companies, such as Rural Support Programmes), is not yet involved in the branchless banking dialogue. However, it is possible that branchless banking models may be applied to leasing companies and some rural support programmes.

PTA, as the telecommunications regulator, treats m-banking as it does any other value-added service: it requires only that it be notified before the service is introduced. **With respect to financial services provision by mobile network operators, PTA would not be involved** because this would fall under the purview of SBP or SECP.

Government authorities generally seem to believe that the bank-led model is better suited for Pakistan than the telco-led model, despite the fact that G-Cash from the Philippines, a typical telco-led model, has often been referenced in our discussions.

A strict anti-money laundering/combating the financing of terrorism (AML/CFT) regime is seen as important, but such a regime is not seen by government authorities as a significant obstacle to branchless banking models.

3. State of Play: Industry

With about a million active loan clients out of an estimated 20 million potential

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microfinance borrowers and a total population of 153 million, **the microfinance market has a huge potential for growth. Several types of organizations realize that this potential probably can be fulfilled profitably only by exploring alternatives to brick-and-mortar branches**, given the cost and time required for organic growth via traditional approaches.

Among regulated financial institutions, commercial banks are the largest players and have the capacity to provide branchless banking. However, most banks are not interested in pursuing branchless banking. Commercial banks' use of information and communication technologies is, in most cases, restricted to automatic teller machines (ATMs), short message service (SMS) banking for basic account queries (not for transactions), and in a few cases, Internet banking. One bank is developing a mobile-based "micropayments product" through which customers can make small-scale transfers of value from their bank account to third parties, including airtime and utilities providers and other individuals. Such a product could be adaptable to a wide range of clients, including the unbanked, although the bank in question is considering the product only for its current clients. **Most banks are highly profitable and, therefore, may not be strongly motivated to explore new business models.**

At least one MFB sees agent-assisted branchless banking as an important part of its growth strategy. One leasing company (regulated by SECP) is currently introducing a network of point-of-sale (POS) terminals at merchants, and one NGO-MFI is considering working with a mobile network operator to offer its customers basic banking services through mobile phones, with the MFI's outlets as cash-in/cash-out points.

The Pakistan Post has more than 12,000 post offices (of which approximately 7,500 are Pakistan Post Savings Bank branches and offer financial services) that could be used as agents for banks. Currently, post offices are used as agents for the government and utilities; they are not yet used as agents for financial institutions.

Mobile network operators, by contrast, are ready and very eager for the introduction of a range of value-added services, including some form of branchless banking. Pakistan's mobile market is large and highly competitive. In the past several years, three new operators have entered the market—Telenor, Warid, and China Mobile—paying a combined USD 1 billion in licensing fees alone (and perhaps as much as USD 2 billion to fully establish themselves). Such investment is remarkable because the Pakistan mobile market has some of the lowest average revenues per user in the world. Value-added services are seen as critical to consolidating the customer base and generating additional revenues. A few mobile network operators have started developing concrete proposals for a telco-led model, although most are concentrating on offering banks the use of mobile phones as an access channel to existing customers' bank accounts.

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4. State of Play: Clients

Characteristics of poor customers in Pakistan—particularly widespread illiteracy—may create challenges in achieving customer adoption of new banking models, particularly for mobile banking approaches. Pakistan has more than 40 million mobile phone subscribers, and less than 50 percent of the adult population is literate. Because a majority of poor clients are illiterate, most poor customers use only voice services. Even simple data services, such as SMS, are not widely used among poor customers. In fact, literate customers find it difficult to use SMS in Urdu, particularly if handsets offer only Latin characters.

5. Legal Challenges to Branchless Banking

In Pakistan, branchless banking has the potential to increase poor people's access to financial services if regulation (a) permits the use of agents outside bank branches, thereby increasing the number of service points; (b) eases account opening (both on site and remotely) while maintaining adequate KYC standards; and (c) permits a range of players to provide payment services and issue e-money, thereby enabling innovation from multiple sources.

5.1 Use of Agents

The **Banking Companies Ordinance** (1962) restricts the use of agents for cash-in/cash-out activities and account opening. Only banks are allowed to accept deposits withdrawable by check from the public.⁵ A branch is defined as the place where deposits are received, checks cashed, or money lent, which implies that all these activities can be conducted only through bank branches.⁶ Although it might be legally possible for customers to withdraw money outside of bank branches, because this is not among the cash-out services explicitly prohibited (receiving loans and cashing checks), it is at least questionable whether this is in line with the original legislative intent.

The **prudential regulations under the Banking Companies Ordinance** prohibit any cash payments outside bank branches with two exceptions: ATMs and withdrawals at "Authorized Merchant Establishments at various Points of Sale" subject to a cash limit of Rs. 10,000.

With respect to MFBs, the **Microfinance Institutions Ordinance** (MFI Ordinance) permits MFBs to "appoint agents in various locations for various activities which it may consider necessary for the proper discharge of its functions."⁷ The Branch Licensing Policy allows MFBs to open "booth(s) for collection of cash or for making spot payments," yet only in special or exceptional circumstances. Furthermore, there is no indication that agents would be allowed to operate these booths. Although the MFI Ordinance seems to open some space for the use of agents, the main restriction for cash-in/cash-out at agents can be found in the **prudential regulations**, which clearly

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prohibit “any business of cash payments” at a place outside the MFB’s branches, the only exceptions being when SBP has granted permission for mobile banking (i.e., the use of mobile vans and small service centers).⁸

Exchange companies, which are also regulated by SBP, can make use of agents in remote areas (so-called payment booths/outlets).⁹ However, these agents currently are permitted to provide only one service: payment (in Pakistani rupees only) of remittances from foreign countries.

5.2 AML/CFT

The current AML/CFT regime covers only financial institutions regulated by SBP or SECP. It does not cover non-banks. None of the primary laws specifies AML/CFT measures, but various regulations issued under these laws do.

For banks, the **regulations under the Banking Companies Ordinance** state that the computerized national identity card (CNIC) bearing the photograph of the customer (or, alternatively, a passport) is the main customer verification tool. Banks are required to verify the CNIC with the National Database and Registration Authority and can make use of an online verification system, Verisys, to do so.¹⁰ **There is no small-value relaxation** of KYC rules for banks. Therefore, it is difficult for customers who do not have a CNIC to open a bank account. Approximately 25 percent of Pakistanis do not have a CNIC. The regulations under the Banking Companies Ordinance also require that a new banking customer be introduced by a current bank account holder.¹¹ This presents another obstacle to increasing access to financial services in areas with low coverage.

With respect to enforcement, SBP does not have the power to take any individual to court for laundering money. This will change once the Anti-Money Laundering (AML) Bill has been enacted (see below).

Non-face-to-face customer verification is not explicitly prohibited. However, enhanced customer due diligence (CDD)—for example, independent verification by a reliable third party or a client report from the customer’s previous bank—is required for non-face-to-face/on-line customers.¹² It is difficult for unbanked people to comply with either of these examples of enhanced CDD.

With respect to MFBs, the wording of CDD requirements in the prudential regulations is rather vague. According to the prudential regulations, MFBs are required to “interalia obtain copies of National Identity Card or Passport or Driving License, etc., from the client, which shall be stamped as ‘original seen’ by the MFB officer.”¹³ Because the officer has to stamp the copy, it is not possible to open an account remotely. The regulations allow for greater flexibility in remote areas: “In far-flung and remote areas where people, particularly women, do not have identity cards, the MFB may extend micro-credit by establishing identity through other appropriate means.”¹⁴

Regarding both domestic and international transfers of funds, banks are required to

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include “accurate and meaningful originator information (name, address, and account number).” However, a “CNIC, Passport, Driving License or similar identification” can substitute for the address requirement.¹⁵

5.3 Payment Systems and Regulation of e-Money

The current legal environment does not provide for a specific definition of “payment,” nor does it provide for specific regulation of payment system providers. The main providers of payment services in Pakistan are banks and exchange companies. **The Banking Companies Ordinance and the regulations thereunder prohibit non-banks from providing cash-in services and specify limits for cash-out services.** It is unclear whether a payment service is covered by this prohibition.

A non-bank can provide payment services only if it does not fall under the definition of banking business in the Banking Companies Ordinance. According to the Banking Companies Ordinance, “banking means the accepting, for the purpose of lending or investment, of deposits of money from the public, repayable on demand or otherwise, and withdrawable by cheque, draft, order or otherwise.”¹⁶ Under this definition, it appears that an entity is not conducting banking business if it takes deposits for a purpose other than lending or investment. However, the receipt of funds and the payment of funds falls within the provisions of the **Companies Ordinance (1984) and its Rules (1987)**, which place restrictions on companies’ ability to invite, accept, or retain deposits.¹⁷ It can therefore be concluded that payment services can currently be provided only by banks and exchange companies.

There are two private ATM switches in Pakistan: M-Net, owned by MCB Bank, and 1-Link, owned by eleven banks. Non-banks are not members of either of the switches. The Board of 1-Link, comprised of representatives of the eleven founding banks, makes decisions regarding new 1-Link members. According to a 2002 SBP Circular, all banks (but not MFBs) are required to join one of the two switches. Both switches are interconnected, and the fee for a bank member of one switch accessing the other switch was capped at Rs. 15.

5.4 Other Issues Relevant to Branchless Banking

Foreign remittances are not subject to major restrictions, but can be provided only by banks or exchange companies. They are subject to the KYC rules mentioned above. Interestingly, agents can be used to provide foreign remittances, as described above. The foreign exchange market is fully liberalized.

E-security issues will be covered in the draft Electronic Crime Bill (2006). The mission team did not have access to this bill. The Electronic Transactions Ordinance (2002) defines digital and e-signatures. Biometrics are recognized as an acceptable form of e-signature. The ordinance also required the creation of an Electronic Certification Accreditation Council, which has not yet happened.

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Competition issues in branchless banking are not yet a primary concern. At present, the Monopoly Control Authority is specifically excluded from jurisdiction over any area where there is a dedicated regulator (e.g., banking and telecommunication). SBP does not have a dedicated competition unit, while PTA reports that it has recently begun drafting regulations on competition.

Consumer protection issues in branchless banking have not yet been addressed. There are Consumer Protection Acts on the provincial level, but either provinces have not enacted them yet or the consumer protection entities provided for in the law have not been established yet.

Data security and privacy seem not to be considered very important in Pakistan. There is no dedicated data privacy or security law. Consumers have no right for their personal information to be private, to give or refuse consent for its release, or to seek redress if information held about them is inaccurate.

6. Areas of Opportunity

6.1 Use of Agents

The **draft Banking Act (2006)** (Banking Bill) will introduce some changes in the treatment of branchless banking models. One positive aspect of the bill is that it broadens the meaning of the term “branch” by explicitly including a “mobile place of business,” an “electronic terminal,” and “any other place of business as may be specified by the State Bank in regulations” (SEC. 2(h)). Furthermore, “using computers or other electronic systems or delivery channels to carry out any of the foregoing subject to any regulations as may be issued by the State Bank” is added to the list of permissible bank activities. These provisions seem to allow for alternatives to traditional brick-and-mortar bank branches, but they do not explicitly permit the use of non-bank agents to handle cash, conduct KYC checks and perform other functions central to branchless banking approaches that reach customers and areas beyond those served by the traditional bank branch system. A major restriction for making use of agents can be found in the Banking Bill, which (like the Banking Companies Ordinance) allows only banks to accept “public deposits of money withdrawable by cheque,” although the acceptance of deposits by agents to be held in non-checking accounts might still be possible.¹⁸

In both the current banking law and its draft revision, either a single institution or a class of institutions can be exempted from any or all provisions of the law. The Banking Companies Ordinance authorizes the federal government, on the recommendation of SBP, to make such an exemption, and the Banking Bill gives SBP the power to exempt (with notification to the federal government).¹⁹

The easiest way to provide for the use of agents by banks, which would not require any legal changes at all, would be for the **federal government** (or SBP once the Banking Companies Ordinance has been revised, assuming that the Banking Bill is promulgated

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in its current form) **to make use of its power to exempt banks from compliance with any provision that might prevent them from using agents.** This could be done on a case-by-case basis or by issuing guidelines for the use of agents, which would clearly specify under which conditions and from which provisions banks are exempted. In addition, SBP would have to amend the prudential regulations under the Banking Companies Ordinance to permit cash-handling outside of bank branches. At the same time, regulations could specify additional risk-mitigation measures for banks making use of non-bank agents.²⁰

Alternatively, the **Banking Bill could be amended to explicitly permit outsourcing of cash-handling to non-bank agents** subject to such regulations as may be framed by SBP. Although the current draft allows for the use of computers and other electronic devices as delivery channels, it does not permit non-bank agents to use these alternative delivery channels or handle cash on behalf of banks. The latter should be explicitly permitted subject to certain risk-mitigation measures.

With regard to the MFI Ordinance, it seems that it is not necessary to change the law itself, but only to **remove restrictions on cash-handling outside MFB branches** under the current regulations. In addition, SBP's Guidelines for Commercial Banks to Undertake Microfinance discuss linkages between banks and MFBs (and MFIs) as one possible institutional arrangement. These could be amended not only to allow for banks to provide wholesale funds for on-lending, but also to allow banks to make use of MFBs as agents in delivering financial services.

6.2 AML/CFT

The Government of Pakistan has drafted an **AML Bill**. If enacted in its current form, the bill will establish a National Executive Committee that is required to ensure SBP issues necessary prudential regulations to all financial institutions in the area of AML/CFT. AML regulations would continue to coexist with this dedicated AML law, although the AML law would override any inconsistent provisions in any other act.

The AML Bill itself does not discuss account-opening requirements, but the federal government and the Financial Monitoring Unit will have powers to make rules and regulations, respectively. This means that the **AML Bill opens the opportunity to relax KYC/CDD requirements for small-value accounts on the level of its rules and regulations.**

Since AML/CFT rules for banks and MFBs will continue to exist under the Banking Companies Ordinance and the MFI Ordinance, respectively, similar relaxations of KYC/CDD requirements could be considered under both these laws. No change of the Banking Companies Ordinance would be required, but SBP could **amend the prudential regulations** for banks to alleviate any access-restraining effect of KYC requirements. For example, the regulations could allow for alternatives to the CNIC for customers who do not have a CNIC and could broaden the options for personal

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introductions. Both relaxations could be subject to certain transaction limits. Regarding remote account opening, the use of the CNIC number and Verisys makes verification for remote account opening relatively easy. The enhanced CDD requirements for non-face-to-face customers could explicitly allow for verification by agents as “reliable third parties.”

For MFBs, it would be advisable to **clarify in the prudential regulations** what exactly is accepted as alternatives to the CNIC. At the same time, remote account opening with online verification of the CNIC could be allowed subject to certain transaction limits. Again, both requirements do not require an amendment of the law, but could be dealt with in the prudential regulations.

6.3 Payment Systems and Regulation of e-Money

In addition to the Banking Companies Ordinance, the Banking Bill includes a definition of “deposit.” Reading this definition together with the definition of “banking business,” it seems quite clear that e-money schemes operated by non-banks would fall under the definition of banking business and thus could not be operated by non-banks. **The Banking Bill would have to be amended** to draw a clear line between e-money schemes and deposit-taking. Only the latter would be regulated under this act.

Another bill is the draft Payment System and Electronic Funds Transfer Act (PSEFT Bill), which, for the first time, defines electronic money and permits a wide range of institutions, not just banks, to issue it. Once enacted, all financial institutions offering payment services (including institutions providing electronic fund transfers) would be regulated under this act. The PSEFT Bill itself does not specify regulatory provisions for payment systems. However, SBP, as the regulatory authority, enjoys broad powers to make rules under the act.

The revised **PSEFT Bill should provide a clear distinction between banking and payment services provision.** The current draft could be amended to clarify that non-banks can also operate e-money schemes. At the same time, SBP should have the power to prescribe sufficient risk-mitigation measures for e-money schemes in regulations under the act.

6.4 Other Areas of Opportunity

The Electronic Crime Bill (2006) is interesting to look at with regard to cyber security issues of branchless banking models.

A proposal has been made to transform the Monopoly Control Authority into a Competition Commission with authority that would span all sectors. It also would be interesting to look at the regulations on competitions currently being drafted by the PTA.

Data security issues also will be covered under the PSEFT Bill. PTA wants to look at data security as part of its regular due diligence on value-added services.

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¹ Mark Pickens, Stefan Staschen, Timothy Lyman and Stephen Rasmussen participated in the mission, with support from Moazzam Iqbal of the Pakistan Microfinance Network. The Pakistani law firm of Vellani & Vellani provided advice on the interpretation of various laws, regulations, and bills mentioned.

² This summary contains CGAP's findings based on research through April 2007.

³ A draft version of this document was presented at an April 30, 2007, roundtable of regulators, policymakers, and private-sector players with an interest in branchless banking in Karachi.

⁴ The other countries are, in chronological order, Kenya, South Africa, Philippines, India, Russia, and Brazil.

⁵ SEC. 87 of the Banking Companies Ordinance. It's not quite clear whether this means that deposits other than deposits withdrawable by check could be accepted by non-banks.

⁶ SEC. 5 (d) of the Banking Companies Ordinance.

⁷ SEC 6(2)(o) of the MFI Ordinance.

⁸ Regulation 21 of the Prudential Regulations for MFBs.

⁹ EPD Circular Letter No. 09/Policy 24/2004 of September 30, 2004.

¹⁰ Annexure VIII of the Prudential Regulations for Corporate/Commercial Banking.

¹¹ Regulation M-1, clause 5 of the Prudential Regulations for Corporate/Commercial Banking.

¹² Regulation M-1, sub-clause (iv) of clause 8 of the Prudential Regulations for Corporate/Commercial Banking.

¹³ Regulation 17 of the Prudential Regulations for MFBs

¹⁴ Ibid.

¹⁵ Regulation M-2 (c) of the Prudential Regulations for Corporate/Commercial Banking

¹⁶ SEC. 5(b) of the Banking Companies Ordinance.

¹⁷ SEC. 88 of the Companies Ordinance 1984 in combination with SEC. 2 (b) and 3 of the Companies (Invitation and Acceptance of Deposits) Rules, 1987

¹⁸ SEC. 172 of the Banking Bill

¹⁹ SEC. 93 of the Banking Companies Ordinance and SEC. 179 of the Banking Bill

²⁰ For example, banks can be made clearly liable for the actions of their agents, and SBP could maintain the right to supervise agents' operations as if they were undertaken by the banks themselves.

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List of Persons Met

Organization	Participants	Designation
State Bank of Pakistan	Azhar I. Kureshi	Advisor to the Governor on Development Finance
	Qasim Nawaz,	Director, SME and Microfinance Department
	Zulfiqar Khokhar	Joint Director, SME and Microfinance Dept.
	Qazi Shoaib	Junior Joint Director, SME and Microfinance Dept.
	Sabah-uz-Zaman	CIO
	Kashif A Hashmi	Co. Director
	Syed Irfan Ali	Director, Banking Policy and Regulations Dept. (in charge of AML/CFT)
	Amjad Iqbal	Junior Joint Director, Banking Policy and Regulations Dept. (in charge of AML/CFT)
	Syed Ali Jafar Abidi	Joint Director, Banking Supervision Department
	Mahmood-ul-Quddus Khan	Assistant Director, Banking Supervision Department
	Inayat Hussain	Director, Banking Inspection Department
	Muhammad Ashraf Khan	Director, Agricultural & Rural Credit Department
	Kamran Akram Bakhshi	Joint Director, Agricultural & Rural Credit Department
	Saeed Siddique	Project Manager, Real Time Gross Settlement System
	Syed Sohail Javaad	Joint Director, Real Time Gross Settlement System
	Lubna Farooq Malik	Director, Banking Surveillance
	Syed Mansoor Ali	Joint Director (in charge of AML/CFT)
	Inayat Hussain	Director, Banking Inspection Department
M. Saleem Rehmani	Director, Payment Systems Department	
Ministry of Finance	Arshad Ahmad	Deputy Secretary-Banking
	Muhammad Iqbal Hussain	Senior Joint Secretary
Ministry of Information Technology	Farrukh Qayyum	Secretary, IT & Telecom
	Mudassar Hussain	Director (Telecom Wireless)
	Salman Malik	SPM (Business)

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Organization	Participants	Designation
Standard Chartered Bank	Amaar N. Ikhlas	Channel Manager - Alternative Distribution Channels
	Saad Khan	Product Manager - Alternative Distribution Channels
Bank Alfalah	Asadullah Jamil	Executive-in-charge of IT Division
United Bank Limited	Dr. Arif Ahmed	Group Head, eCommerce
Orix Leasing Pakistan	Teizoon Kisat	Deputy Managing Director
Tameer Microfinance Bank	Shahid Mustafa	Group Executive Director
	Ali Abbas Sikander	Group Executive Director
First Microfinance Bank	Hussain Tejany	President
AMZ Securities	Athar Naseem Shaikh	Chief Executive Officer
	Fauzia Hasnain	Chief Operating Officer
AMZ Ventures	Uzair Khan	Chief Executive Officer
Pakistan Banks' Association	Masood H. Raza	Secretary
	Kalim-ur-Rahman	Secretary General
1 Link	Muhammad Asif Durrani	Manager Business Development
	Akber Sultan	Asst. Vice President, Operations & Networking
USAID	Qazi Farid Ahmad	Economic Growth Specialist
ADB	Mohammed Azim Hashmi	Project Implementation Officer
DFID-Pakistan	Haroon Sharif	Private Sector Development Adviser
European Commission, FSSRP, Pakistan	Mohammad Awais Butt	Micro Finance Expert
Mobilink	Awais Malik	Head of Value Added Services
	Taimur Cheema	Assistant Manager-VAS
Warid	Asif Rumi	Head of Interconnection
	Omer A. Haider	General Manager, Govt. Relations & Regulatory Affairs
Telenor	Muhammad Khalil Ashraf	Manager Pricing
	Kornelija Lipus Eriksen	Segment Manager
Ufone	Asim Syed	Strategic Planning & Business Development

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Pakistan Telecommunication Authority	Kamran Ali	DG (Law & Regulation)
	Muhammad Ahsan Jafri	DG Wireless Licensing)
Security Exchange Commission of Pakistan	Saleman Ali Shaikh	Commissioner (Specialized Companies Division)
	Akif Saeed	Executive Director
NADRA	Khalid Shah,	General Manager, PSD
	Aamir Ali Khan	Manager Operations, PSD
Kashf Foundation	Khalid Kabeer	Chief financial Officer
	Faisal Malik	Chief Information Officer
Infospan	Raúl Hinojosa Ojeda	Chairman and President
	Shoaib Malik	Vice President
	Rehan-ul-Haq Khan	Business Development/Project Manager
Pakistan Post	Arshad Khan	Chairman, Director General
	Fazli Sattar Khan	Dy. Director General (AF)

DISCLAIMER: This document summarizes results from a rapid analysis of the regulatory environment for branchless banking in Pakistan conducted in January 2007 with follow-up through April 2007, and is subject to the inherent limitations of such an approach.