Telesom ZAAD
Pushing the mobile money CVA frontier

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Introduction

Ongoing humanitarian crises in Somaliland and greater Somalia have resulted in some of the largest cash and voucher assistance (CVA) programmes in the world. Humanitarian organisations and mobile money providers have extensive experience — and have learned important lessons — using mobile money to deliver CVA to vulnerable populations in these fragile environments.

In November 2018, over 900,000 people[1] in Somaliland were either internally displaced or suffering from a combination of drought, flooding and cyclones that had hit the region earlier that year. Today, Somaliland hosts approximately 19 per cent of beneficiaries[2] who received CVA transfers in Somalia in 2018.

Since its launch in 2009, mobile money provider Telesom ZAAD has gained huge traction in Somaliland where 78 per cent of the population use its service.[3] While the majority of international non-governmental organisations (INGOs) distribute CVAs through ZAAD, a provider with a ubiquitous presence and openness to innovation, large United Nations agencies are still using their own digital systems to deliver CVA due to regulatory and identification barriers in the country. As a result, today, just 10 to 15 per cent of CVA in Somalia is currently delivered through mobile money.

Nevertheless, as humanitarian organisations seek better solutions for CVA delivery, and mobile money providers like ZAAD are interested in providing transparent, secure and cost-effective solutions for humanitarian organisations designing creative strategies to overcome regulatory and ID barriers, mobile money is set to play an even greater role in CVA delivery in Somaliland.

This case study reveals the promise of mobile money-enabled CVA programmes in Somaliland. It documents the innovative steps that ZAAD and humanitarian organisations have already taken to meet the needs of beneficiaries, and highlights the challenges mobile money providers (MMPs) and humanitarian organisations must overcome to scale further and realise the full potential of mobile money CVA.

1. UNOCHA (January 2019). Cash Based Programming in Somalia.
2. Ibid.
3. World Bank (July 2017). Mobile Money Ecosystem in Somalia.

Somalia's humanitarian context

The history of humanitarian assistance in Somalia

Since the 1970s, conflict, drought and flooding have created prolonged instability and recurring critical emergencies in Somalia. In 1991, the northern region of Somalia declared independence as the autonomous state of Somaliland,[4] establishing its own governance structure, constitution, Central Bank and currency. Somaliland is host to a large population of internally displaced persons (IDPs). The World Bank estimated there were about 50,000 IDPs[5] in Somaliland in 2010, which swelled to 90,000 in 2013,[6] a sign of how quickly conditions can change in the region. However, more recent crises have been even more severe.

A drought in 2016–17 displaced another 266,000 people in Somaliland, 91 per cent of whom were from Somaliland and the remaining from other regions of Somalia.[7] **As of March 2018, approximately 314,000 IDPs were living in Somaliland,[8] just under 12 per cent of all IDPs in Somalia,[9] and a 370 per cent increase over the last two and a half years.[10]** UNOCHA estimates 80 per cent of IDPs in Somalia live in urban areas, and while only 45 per cent have been living in the same location for three years or more, 90 per cent intend to stay where they are.[11]

In addition to the IDPs in Somalia, UNOCHA estimates another 1.5 million Somalis who have remained in their home communities require humanitarian assistance. Overall, including refugees and returned refugees, **UNOCHA estimates there are 4.2 million people in Somalia who will need humanitarian assistance in 2019, just over a third of the population.** This history of instability, combined with the magnitude of response needed, has resulted in multiple, large-scale CVA programmes operating in Somaliland and the greater Somali region.

Humanitarian CVA coordination in Somalia

Many INGOs began distributing CVA in Somalia through the hawala system (informal networks of money transfer agents) in 2003, and later trialled digital options, including mobile money, in the emergency response to the drought of 2011–12. Since then the use of mobile money has increased markedly, playing a major role in the emergency response to the series of natural disasters (drought, cyclone, floods) that affected Somalia between 2016 and 2018.

Three prominent working groups coordinate CVA programming in Somalia:

1. The Cash Consortium managed by Concern Worldwide has six member INGOs. In 2018, it distributed unrestricted transfers, mostly via mobile money, to 50,000 households.[12]

2. Building Resilient Communities in Somalia (BRCiS), led by The Norwegian Refugee Council (NRC), has five member INGOs (including Concern Worldwide) that implement CVA across central and south-central Somalia.

3. Somalia has had a very active Cash Working Group (CWG), especially during the 2011 drought response. However, it became inactive as the emergency of 2011 subsided. The CWG was re-established in February 2017 to respond to the 2016–17 drought. Its members include donors, national and international NGOs, UN agencies, and is currently co-chaired by the World Food Programme (WFP) and Concern World Wide. CARE supports in leading the Somaliland CWG (regional CWG).

2017 inter-agency evaluation of CVA in Somalia

In August 2018, an evaluation of CVA in 2017[13] noted that $30 to $48 million was distributed to 2-3.2 million beneficiaries every month during the most intense periods of emergency.[14] Most CVA was distributed for basic needs, with 92 per cent for food or water. On average, about 44 per cent of transfers were in the form of vouchers, with the remaining 56 per cent delivered as unrestricted cash.

While the evaluation does not provide figures on the CVA delivery mechanism, mobile money is identified as one of the main delivery mechanisms along with electronic stored-value cards (for both e-vouchers and cash). It is also noted that mobile money is cheaper than other distribution mechanisms (especially hawalas). **Humanitarian organisations reported that beneficiaries ask for distributions via mobile money because of its convenience. One of the key recommendations of the evaluation is for humanitarian organisations to explore increasing the use of mobile money in the future.**

Humanitarian organisations also cited their most common reasons for not using mobile money:

- Beneficiary verification is challenging;
- Regulations are unclear; and
- Tracing funds is too difficult.

Verification and regulatory issues are addressed in more detail in the following section, but humanitarian organisations have indicated that the traceability of funds is a barrier to ensuring that the funds they distribute are only spent on specified items (e.g. food). The current mobile money system does not enable this type of tracking.

Humanitarian organisations also noted that mobile coverage is problematic in rural areas and it can be difficult to find a mobile money agent. They also expressed concerns about the ease with which elderly and illiterate people are able to conduct transactions.

4. The literature often only gives statistics for Somalia, without providing specific figures for Somaliland. In these cases, Somalia statistics are used as reference. However, whenever Somaliland statistics are available or can be estimated, they are also included.
5. Somaliland primarily hosts IDPs, although there are some refugees from Yemen and Ethiopia, too.
6. Bryld, E., et al. (2014). Analysis of Displacement in Somalia. Global Program on Forced Displacement, The World Bank.
7. Immigration and Refugee Board of Canada (March 2019). Somalia: Somaliland, including government structure, security, and presence of internally displaced persons (IDPs) from Somalia (2016-March 2018). Refworld.
8. UNOCHA estimates there were 594,000 IDPs in Somaliland in November 2018. It is unclear why these figures are so different from UNHCR ones from March 2018. See: UNOCHA (January 2019). 2019 Humanitarian Needs Overview Somalia.
9. In January 2019, UNHCR reported there are 2.8 million persons of concern across Somalia, including 2,648,000 internally displaced people. UNHCR (January 2019). Somalia Operational Update.
10. UNHCR Operational Data Portal (31 March 2018). CCCM Cluster Somalia Overview.
11. UNOCHA (January 2019). 2019 Humanitarian Needs Overview Somalia.

12. CVA programmes generally lasted six months and transfer values were US$60, $70 or $85.
13. Daniels, M., et al. (August 2018). Evaluation of the 2017 Somalia Humanitarian Cash-Based Response. Cash Working Group.
14. These numbers are self-reported by humanitarian organisations. Therefore, it is not clear whether the monthly fluctuations are due to actual differences or reporting differences. Data from three months (April, November, December) is missing.

Current trends in CVA in Somalia

The OCHA CVA statistics portal[15] compiles data from 77 partner organisations[16] in Somalia to generate headline statistics on CVA across the country. The data presented in this case study is from January through November 2018. This period includes the response to a large flooding event in April and Cyclone Sagar in May, as well as on-going issues from the drought of 2017.

According to the portal data, both total CVA values and the number of beneficiaries receiving CVA increased throughout 2018. Based on Figure 1, the total value transferred in 2018 was just under $267 million. Moreover, the OCHA 2019 Humanitarian Needs Overview[17] estimates that in 2019, $292 million will be needed in CVA (an increase of $25 million), which will account for 27 per cent of all planned humanitarian assistance in 2019.

Figure 1

2018 CVA transfers for Somalia

Transfer Value (US$)

Number of Beneficiaries
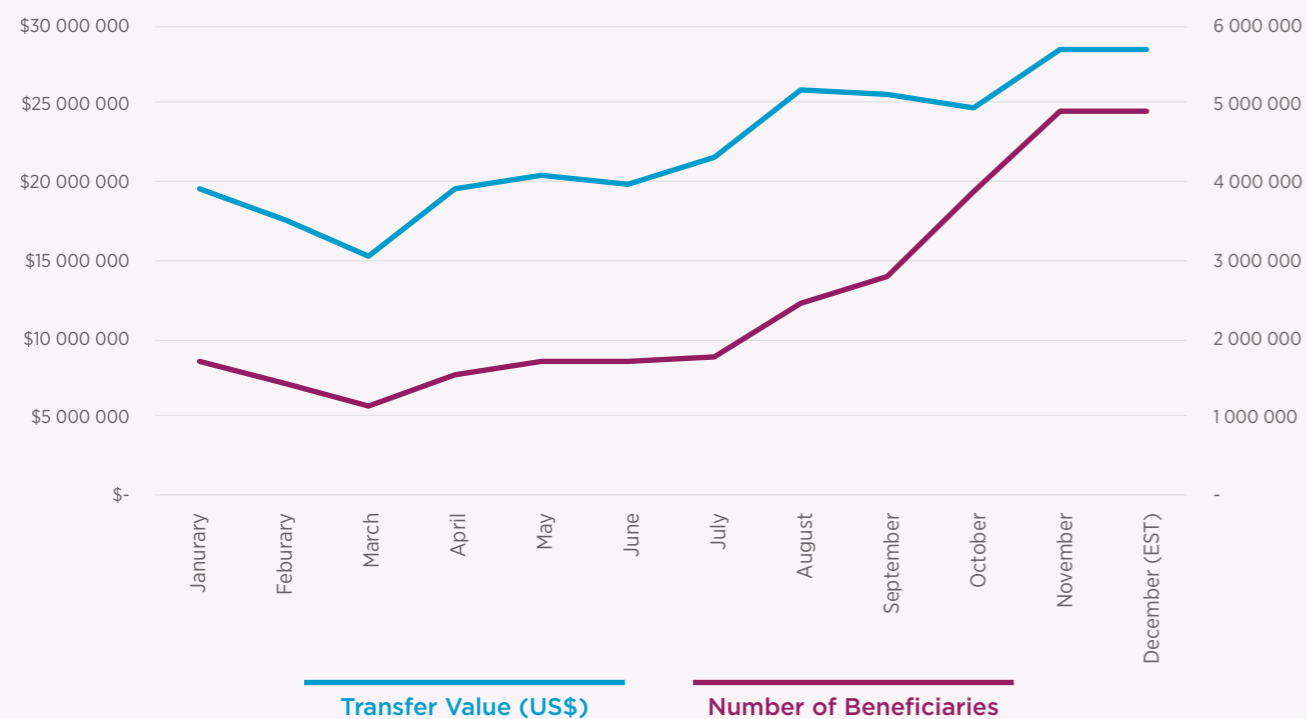
OCHA also reports transfers by region each month. For November 2018 (the latest month available), nearly one million of the 4.8 million beneficiaries were in Somaliland. **This translates into approximately 19 per cent of all CVA in Somalia is distributed in Somaliland, if the proportion is stable over time.**

OCHA data also shows that in November 2018, WFP was by far the organisation distributing the highest value and volume of CVA, reaching just over 2.7 million beneficiaries: 57 per cent of all beneficiaries that month. UNICEF was second, distributing to just over 840,000 beneficiaries (17 per cent of the total). **Thus, WFP and UNICEF delivered CVA to three-quarters of all beneficiaries reached.**

While WFP is typically the major provider of CVA every month, other humanitarian organisations are beginning to account for a much larger share. For example, FAO distributed CVA to six per cent of beneficiaries in November, but in October their CVA represented 18 per cent of the monthly total.

Despite these monthly shifts in the size of CVA programming, the statistics establish a baseline for mobile money. In November 2018, approximately 80 per cent of beneficiaries received CVA from either WFP, UNICEF or FAO, none of which use mobile money as a distribution mechanism.[18] For the remaining beneficiaries, 50 to 75 per cent may receive their CVA via mobile money.[19] **This means that in November 2018, approximately 10 to 15 per cent of CVA beneficiaries across Somalia received CVA via mobile money.**

The WFP SCOPE system in Somalia

In 2018, WFP reported distributing $140 million in CVA,[20] or about 52 per cent of all CVA distributed in Somalia that year. Given the large role WFP plays in the CVA space in Somalia, it is important to understand its delivery mechanism. SCOPE is a beneficiary and CVA distribution management platform that WFP uses in fragile states where infrastructure may not be adequate. WFP began using SCOPE in Somalia in February 2015, and **by February 2017 had biometrically registered 1.6 million people.** For each beneficiary, the head of household and two alternates register their fingerprints and phone numbers, and a photo is taken that is stored on the system.

A SCOPE card is then issued to the head of household. **The SCOPE card has an embedded microprocessor chip, which can hold value in multiple digital wallets and be used in areas without mobile coverage.** For example, WFP and UNICEF in Somalia deposit funds into different wallets on the same SCOPE card. The value can be restricted for use at designated merchants or can be programmed to be withdrawn as cash. WFP Somalia estimates that about 40 per cent of CVA delivered through SCOPE is cash and 60 per cent is restricted

vouchers, mainly in rural areas where markets are still not functioning.

WFP has a network of 900 retailers across the country that accept the SCOPE card, and a partnership with Standard Chartered Bank where beneficiaries can withdraw cash at 30 affiliate locations. Each retailer and bank affiliate has a Point of Sale (PoS) machine and fingerprint reader that allow the beneficiary to transact and receive a paper receipt with their remaining balance. However, the card is not linked to a bank account.

While other humanitarian organisations could use the SCOPE system, they may not be given access to beneficiary data and may not be able to use the biometric functionality.

Though WFP prefers to make distributions based on a national ID system and local mechanisms like mobile money, it has indicated that until there is more regulatory certainty around mobile money licensing, and mobile money is better able to verify beneficiaries, it is not an appropriate modality for the agency.

Table 1

Source: based on UN OCHA Data Portal

Somaliland CVA Transfer Values

	Average total transfer value/month	Average number of beneficiaries/month	Average transfer value to beneficiary/month
2018	$22,241,908	2,491,158	$8.92

15.   UNOCHA (January 2019). Cash Based Programming in Somalia.
16.   The number of reporting organisations fluctuates significantly by month. Some months, only 18 organisations reported. This could be because not all organisations distribute CVA every month or they do, but do not consistently report it, or a combination of the two. The number 77 is from the latest month available (November 2018).
17.   UNOCHA (January 2019). 2019 Humanitarian Needs Overview Somalia.

18.   FAO's latest website update is from October 2017. WFP and UNICEF both use SCOPE to distribute CVA.
19.   This is a best estimate given its popularity as a distribution mechanism in Somalia for non-UN agencies.
20.   Figures in this section are from an interview with the WFP Somalia team in Nairobi, unless otherwise cited.

Mobile money in the region

Telesom ZAAD's path to success

ZAAD's value proposition

With 78 per cent of the population using mobile money services, the majority of users are ZAAD customers (96.5 per cent; 18 per cent have a Somtel E-Dahab account, and 9.1 per cent have a Golis Sahal account).[24] When Telesom launched ZAAD in June 2009, the MNO did not follow the same model as other successful mobile money operations around the world.[25] Rather than build a large agent network where customers could cash in and out of the system, ZAAD focussed on convincing employers to distribute salary payments through their bulk payment system, and merchants to accept mobile money at their stores. They also built, in parallel, their own agent network with employed, salaried staff versus using existing distribution networks with external agents that rely on agent commissions.

The purpose of this strategy was to keep money within the mobile money ecosystem, using salary payments as an entry point to the system, and to encourage digital spending instead of cashing out. To encourage this behaviour, ZAAD did not charge transaction fees to customers or merchants, and focused their efforts on acquiring companies with large numbers of salaried workers and merchants with large numbers of customers. This strategy was also aligned with the company's mission to provide customers with affordable access to financial services.

While these strategies showed promise, and is still Zaad's operational strategy today, **transactions began to grow exponentially in April 2010 when a severe period of drought created a humanitarian crisis.** The Ministry of the President created a National Drought Committee and people donated money through ZAAD to support their relatives. In this sense, mobile money in Somaliland was catalysed by humanitarian cash transfers. ZAAD continues to work with humanitarian organisations and provide CVA disbursements, as CVA programming accounts for a large portion of their revenue stream. It also provides a way for ZAAD to support affected, vulnerable populations in real time and help improve their lives.

| Figure 2 | Source: The World Bank. Mobile Money Ecosystem in Somalia. |

Mobile money penetration in Somaliland

	Penetration	
Geography	**Mobile money**	**Bank**
Somaliland	78%	<14%
Urban areas	81.1%	14.1%
IDP camps	82.2%	0.4%
Rural areas	61.8%	3.7%

Overview

73 per cent of the population in Somalia aged 16 years or older uses mobile money services – tied almost with Kenya[21] –and 78 per cent of the population in Somaliland uses mobile money. These services are offered across Somalia by five MNOs: Hormuud, Telesom, Golis, Somtel and NationLink. Hormuud, Telesom, and Golis combined account for over 96 per cent of mobile money subscribers.[22]

Across Somalia, only 15 per cent of adults have a bank account, yet 90 per cent own a mobile phone.[23] This has created a significant opportunity for mobile money providers like Telesom ZAAD in Somaliland, which has designed unique operational strategies to bring financial inclusion to unbanked populations, achieving some of the highest mobile money penetration rates in the world.

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21.   The World Bank Findex Survey (2017) reports that Kenya has a 73 per cent penetration rate among those aged 15 years and above.
22.   World Bank (July 2017). Mobile Money Ecosystem in Somalia.
23.   Ibid.

24.   World Bank (July 2017). Mobile Money Ecosystem in Somalia.
25.   For a detailed overview of this model, see: Penicaud, C. and McGrath, F. (July 2013). Innovative Inclusion: How Telesom ZAAD Brought Mobile Money to Somaliland. GSMA.

ZAAD's key operational metrics

ZAAD has similar mobile money subscriber base penetration rates to M-PESA in Kenya, often referred to as the leading mobile money provider, while serving a smaller market. The major differences in the providers' strategies are how they built their agent network, and the anchor products they offered customers. While M-PESA's anchor product was person-to-person (P2P) transfers, ZAAD's approach was to encourage customers to pay for their goods and services with mobile money. In doing so, they also built a smaller agent network, as in time most customers were storing their money digitally, using their e-value, and were less dependent on agents to cash out. M-PESA on the other hand, used an existing distribution network to hire agents and pay them commission on certain transactions. The nature of P2P transactions also resulted in customers using the agent network to cash out.

Each approach has pros and cons, and both have led to successful mobile money operations that can be leveraged in the humanitarian cash transfer space. M-PESA contributed 30 per cent of Safaricom's revenue in FY2018, 84 per cent of which is derived from fees for person-to-person (P2P) transfers and cash withdrawals at agents.[26] It should be noted that M-PESA customers makes 12 transactions per month — less than one every other day.

Although ZAAD's active customers perform an average of 60 transactions a month, ZAAD is not able to generate the same levels of revenue from its service as M-PESA, again because they do not charge customers or merchants transaction fees.[27] The ZAAD approach is to "create the value and then capture the value".[28] With active customers making an average of two transactions per day, they have created value in the service and would now like to capture more revenues from it.

With ZAAD's focus on bulk payments, and the large-scale humanitarian CVA operations in Somaliland, this could be an important part of the solution. Humanitarian organisations report paying 1 to 2.5 per cent of the value of the CVA they distribute through ZAAD. **This means that in 2019, there should be about $55.48 million** ($292 million* or 19 per cent) **in humanitarian CVA in Somaliland which, at the current fee structure, would generate between $559,000 and $1.39 million in revenue.** However, challenges with regulations and ID cards will first need to be overcome.

Table 2   Source: The World Bank. Mobile Money Ecosystem in Somalia.

A comparison of ZAAD Somaliland and M-PESA Kenya

	ZAAD Somaliland	M-PESA Kenya
Active Mobile Money (MM) Customers	700,000	21 Million
Population Penetration	78%	73%
MM/MNO Customers	64%	71%
Tx./Mo./Active Customer	60	12

Note: Figures are sourced from the 2017 Global Findex, interviews with ZAAD management in 2018, The Safaricom 2019 H1 Results Presentation and the Safaricom 2018 Annual Report.

26.   Quoted in an interview with ZAAD in Hargeisa in November 2018
27.   Quoted in an interview with ZAAD in Hargeisa in November 2018.
28.   Quoted in an interview with ZAAD in Hargeisa in November 2018.

Regulation challenges for ZAAD in Somaliland

As mentioned earlier, **one of the main reasons humanitarian organisations give for not using mobile money for CVA in Somalia is related to regulation.** The regulatory environment in Somalia is complex given the multiple regulatory bodies and enforcement standards. In other countries around the world, mobile money is generally regulated through the Central Bank or another relevant financial authority. In Somalia, the Central Bank closed during the civil war, reopening in 2006.

However, Somaliland established the Central Bank of Somaliland (CBOS) in 1994 to manage the Somaliland shilling and provide oversight to financial institutions. Since Teleson Zaad operates in Somaliland, it is under the supervision of the CBOS. When ZAAD launched in 2009 there was no e-money licence, so it obtained a remittance licence from CBOS instead.[29] **ZAAD reports that CBOS provided ZAAD with a "letter of no objection", which was the standard procedure followed in both Tanzania and Kenya to license M-PESA mobile money before either regulatory authority created e-money policies.**[30]

ZAAD also reports that the CBOS Central Bank Act of 2012 officially gave CBOS oversight capacity for mobile money services,[31] and CBOS has issued a Mobile Financial Service License, which provides operational guidelines for mobile money providers and is audited yearly. **This is important because one of the humanitarian organisations' key concerns is how customer funds are being protected. ZAAD explains that circulars have been issued mandating that 75 per cent of funds must be in a trust account at a licensed bank**[32] **and 25 per cent held at CBOS. This separation of customer funds into a trust account, which ensures they cannot be used for general operations, is considered best practice in the mobile money industry.** Telesom has also adopted customer due diligence (CDD) procedures that are compliant with international guidelines issued by the Financial Action Task Force (FATF).[33]

Moreover, the Central Bank has demonstrated its commitment to regulating mobile money services. In 2018, the Bank drafted a National Payment Systems Act (NPS), with the support of the World Bank, to further provide a regulatory framework that will encourage innovation in mobile money services and also ensure consumer protection. The Draft includes registration requirements, transaction limits, and interoperability requirements, among other requirements. At the time of writing this case study, the Bill is with the President and Council of Ministers.[34]

In Somaliland, ZAAD reports that the Central Bank has created standard licensing and regulation policies to which it adheres. It would be helpful for the international community to further understand these policies to boost their knowledge of Somaliland's financial regulatory framework. **An independent audit of ZAAD's business could help to further build the confidence of the humanitarian community to use mobile money services.**

ID cards, verification and biometrics

Another challenge humanitarian organisations face with mobile money is that they are not able to use the system to verify people's identities. However, this challenge is not specific to mobile money, as **52 per cent of adults in Somalia report not having an ID card.**[35] **Thus, it is difficult to verify their identity during registration or when they transact.**

Mobile money providers and humanitarian organisations have had to develop their own innovative solutions for identifying beneficiaries. For example, ZAAD agents ask people for their ID cards at registration. If they do not have one, they are asked for a written letter from a local chief or prominent business person that verifies their

29.   Penicaud, C. and McGrath, F. (July 2013). Innovative Inclusion: How Telesom ZAAD Brought Mobile Money to Somaliland. GSMA.
30.   Di Castri, S. and Gidvani, L. (February 2014). Enabling Mobile Money Policies in Tanzania: A "test and learn" approach to enabling market-led digital financial services. GSMA.
31.   The CBSd website is no longer accessible, but this is corroborated by a cached version of the CBSd site.
32.   ZAAD holds funds at Dara-Salaam Bank, which it owns and reports is fully licensed by the Central Bank of Somaliland.
33.   Penicaud, C. and McGrath, F. (July 2013). Innovative Inclusion: How Telesom ZAAD Brought Mobile Money to Somaliland. GSMA.
34.   Central Bank of Somaliland website, Bank Supervision (accessed March 2019).
35.   The World Bank (July 2017). Mobile Money Ecosystem in Somalia.

identity. This is the same procedure used by many humanitarian organisations to register people for CVA. Telesom ZAAD then takes a photo of the customer during registration. All agents have computers, and whenever a customer transacts, the photo taken at registration is displayed on the agent's screen so they can verify it is the registered person who is transacting. Additionally, ZAAD offers tiered-KYC system that limits the risk by only allowing larger transactions by customers who have passed increased KYC scrutiny.

ZAAD holds a digital ID of each customer, which they use for verification during each transaction. This is essentially the same level of verification that other leading mobile money services use around the world, and is a practical solution in a country without an ID system. However, some humanitarian organisations prefer using biometrics for registration and verification, like the WFP SCOPE system. CARE Somalia also reports using a biometric beneficiary registration system (BBRS) since 2015, which captures beneficiary fingerprints.

ZAAD is exploring the use of biometrics, piloting fingerprint biometrics with FAO and researching the voice verification service that Safaricom is offering customers in Kenya.[36] People in Somaliland are already familiar with biometrics as iris scans were used in the November 2017 elections and the ID card system is now five years old and being adopted by more and more people. **Humanitarian organisations may still want higher levels of certainty with beneficiary verification, and ZAAD is taking initial steps to develop biometric solutions that would provide this.**

Future opportunities for mobile money CVA in Somaliland

Beyond the issues surrounding regulation and customer identification, there are other opportunities to create solutions that would provide more tailored services to humanitarian organisations and likely generate more revenues for mobile money providers. ZAAD has shown an aptitude to innovate. In 2018, it introduced a **multi-currency wallet** that allows small transactions to be made in Somaliland shillings.[37] [38]

Humanitarian organisations have expressed a desire for additional offerings to improve CVA programming, including:

1. **Bulk payment interfaces:** Some humanitarian organisations currently send beneficiary lists in Excel to mobile money providers, and would prefer a bulk payment interface to manage beneficiary lists and track payments.

2. **Offline systems and restricted features for mobile money accounts:** Given the large amount of restricted CVA in the country and limited mobile coverage in rural areas, restricted features for mobile money accounts and CVA systems that work offline would be beneficial for CVA distribution.

3. **Solutions for beneficiaries with specific needs, such as the illiterate and elderly.**

4. **More available agents and merchants in rural areas:** One of the benefits of the ZAAD service is that since they have their own agent network, they can maintain reliable liquidity levels. Humanitarian organisations report that **beneficiaries rarely complain of liquidity issues,** which can be a challenge in other contexts where CVA is being distributed. However, given that ZAAD agents use computers and the internet, their operations are designed for urban areas and a more appropriate solution for rural transactions will need to be envisioned.

With strong infrastructure,[39] political stability, and a leading mobile money provider like ZAAD, Somaliland is a sound environment to pilot new solutions. The humanitarian organisations operating there are some of the most experienced with CVA and, given that the mobile money system is mature, the outlook is bright for innovations that can push the frontier of mobile money CVA. Although ZAAD's model is unique and cannot be directly replicated, it offers useful lessons that other mobile money providers and humanitarian organisations can apply to their own mobile money CVA programmes.

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36.   Safaricom, Safaricom Annual Report 2018
37.   Previously, the wallet only held US dollars, but the Central Bank of Somaliland required that mobile money P2P transactions under $100 be made with Somaliland shillings.
38.   Penicaud, C (July 2018) Developing a currency exchange functionality to drive mobile money usage: a new mobile money innovation in Somaliland
39.   Infrastructure development is a policy priority for Somaliland. This includes roads and transport, post and telecommunications, ICT and information and ports. http://www.somalilandtrade.net/somaliland/infrastructure/