



Communications
Commission
of Kenya



UGANDA
COMMUNICATIONS
COMMISSION

ARCT

***EAST AFRICAN COMMUNICATIONS
ORGANIZATIONS (EACO) GUIDELINES ON
ROAMING SERVICES (DRAFT)***

**EACO CONSUMER
ISSUES COMMITTEE**

TABLE OF CONTENTS

1.	<u>INTRODUCTION</u>	3
1.1	BACKGROUND	3
1.2	OBJECTIVE OF THE GUIDELINES	3
1.3	OVERVIEW OF THE GUIDELINES	3
2.1	OVERVIEW	4
2.2	CALL TYPES	4
2.3	MOBILE PHONE TECHNOLOGIES	4
2.4	ACTIVATION OF REGIONAL MOBILE ROAMING	5
2.5	CHARGING ARRANGEMENTS	5
3.	<u>BETTER ACCESS TO CONSUMER INFORMATION</u>	6
3.1	OVERVIEW OF ACCESS TO INFORMATION	6
3.2	HOW INFORMATION IS CURRENTLY PROVIDED TO CONSUMERS	6
3.3	WHAT INFORMATION SHOULD BE PROVIDED TO CONSUMERS	8
3.4	EMERGING TECHNOLOGY AND REGULATORY ISSUES	8
3.5	ALTERNATIVES AVAILABLE TO CONSUMERS	9
3.5.1	<u>RESTRICTIONS ON MOBILE SERVICES</u>	9
3.5.2	<u>LOCAL PRE-PAID SIM CARDS</u>	9
3.5.3	<u>MULTIPLE SIM CARD MOBILE HANDSETS</u>	9
3.6	SUBSTITUTES ARE OFTEN INCONVENIENT	9
	<u>CONCLUSION</u>	10

1. INTRODUCTION

1.1 Background

Regional mobile roaming (RMR) enables consumers to use their mobile phones when travelling in the region by connecting to partnered provider networks. RMR services have undergone significant changes and advancements since they first became available to consumers in our region. While RMR services and coverage have improved over time, the charges borne by consumers have generally remained high.

At the 3rd Meeting of the EACO consumer affairs committee held in November, 2010 at Kigali, the committee agreed to further investigate the topic of RMR with a strong focus on consumer awareness and information. Rwanda and Uganda agreed to undertake detailed guidelines on roaming in the East Africa Region.

An information sharing workshop was held during the 3rd EACO consumer issues committee meeting held in Kigali in November 2010. During this meeting, participants agreed to work towards developing a set of guidelines to assist countries in providing consumers with access to the information necessary to make informed decisions about how to avoid receiving high and unexpected RMR charges.

1.2 Objective of the guidelines

The objective of these guidelines is to provide regulators with information to empower consumers to make more informed choices between RMR pricing plans and to choose technological solutions that best suit their purposes. Providing these choices will encourage competition and may exert pressure on mobile service providers to offer lower prices.

These guidelines aim to improve consumer awareness by encouraging regulators and providers to offer more comprehensive and accessible information on RMR charges and services. To facilitate this process, the guidelines:

- outline the information that mobile phone service providers should make available to consumers;
- provide examples of appropriate ways to convey information on roaming charges and services to consumers; and
- encourage regulators and mobile phone service providers to monitor and inform consumers of emerging technologies and/or other industry developments that will have an impact on RMR services.

1.3 Overview of the guidelines

These guidelines focus on the type of information that is considered useful to improve consumer awareness of roaming services, including associated charges, technologies and alternatives. The guidelines consist of three sections, which are summarised below.

Section 1: Regional mobile roaming gives an overview of the RMR market and provides information on various technologies and charging systems for roaming services.

Section 2: Better access to consumer information outlines ways in which mobile service providers can provide more transparent, clear and comprehensive information on roaming to their customers.

Section 3: Substitute technologies provide examples of alternative technologies that can be used by consumers to communicate when visiting a country in the region.

2. REGIONAL MOBILE ROAMING

2.1 Overview

RMR services and technologies vary between economies. Some providers offer a wider variety of services and better information on RMR arrangements than others. In order to avoid unexpected high fees, consumers should be aware of these issues before and whilst they travel in the region.

2.2 Call types

There are a variety of RMR services and associated call charges available to consumers travelling in the region, including:

- receiving voice calls originating from home country when in a visited country;
- receiving voice calls originating from third country when in a visited country;
- receiving voice calls originating from the visited country;
- making a voice call from a visited country to a home country;
- making a voice call from a visited country to a third country;
- making a voice call from a visited country to the same country;
- sending and receiving short message service (SMS) and multi-media service (MMS);
- premium mobile content;
- Internet Protocol (IP) data such as the use of the Internet, email, Voice over IP (VoIP) and other data services such as social networking using mobile telecommunications data ; and
- specialised services such as premium mobile content, where additional tariffs often apply.

2.3 Mobile phone technologies

There are a variety of mobile phone technologies used within our region

The most common mobile technologies are listed in Table 1 below.

Table 1 - Mobile phone technologies in our region

Technology	Country
GSM	
HSPDA	
GPRS	
W-CDMA	
CDMA	
Edge	
3G	
EV-DO/EV-DV	
CDMA 2000	

Consumers should be aware of the variety of mobile technologies before they travel, so they can determine which devices are required to roam in certain regions. The consumer should also be made aware of whether their domestic service provider has reciprocal roaming arrangements with a provider(s) at their international destination.

Regulators and mobile service providers are encouraged to make relevant information available to consumers on the mobile phone protocols and frequencies used at their intended destination as well as mobile network coverage maps.

2.4 Activation of regional mobile roaming

RMR services are often automatically activated when consumers travel in the region. However some carriers require consumers to enable roaming on their handsets and/or contact their mobile service provider to request that mobile roaming services be activated.

Mobile phone service providers are encouraged to supply comprehensive information regarding the processes consumers need to undertake in order to access RMR services.

Mobile phone service providers are also encouraged to provide easily accessible information on the technology of mobile phone handsets, including any handset or SIM locking features, which disable roaming unless consumers request it to be unlocked.

2.5 Charging arrangements

Throughout EACO countries there are various charging arrangements for general mobile services and regional/international roaming.

Receiving party pays

In most EACO countries, there are consumer mobile phone plans available where the recipient is not charged for receiving domestic mobile calls. With regional roaming, the receiving party often pays to receive a call. To avoid unexpected high mobile phone bills, regulators and carriers in countries with a 'calling party pays' regime are encouraged to make consumers aware of these arrangements.

Fixed or flat fees

A small number of mobile providers are moving towards providing 'fixed' or 'flat' fee roaming services. For example, a consumer can purchase 100 minutes of talk time to a certain region at a set price. These pricing arrangements allow for the easy comparison of roaming charges and allow customers to choose a predetermined tariff rather than being charged at a different rate each time they roam on to a different mobile service provider's network. This reduces the possibility of inadvertently amassing a very high service fee, which is often referred to as 'bill shock'.

Mobile service providers should be encouraged to, where possible, provide consumers with an option for a flat fee RMR service. Ideally, the scope of these roaming services should be extended to all roaming services, including voice calls, SMS, MMS and data transmissions.

Similar charges when roaming with the same network provider abroad

Throughout the world, a small number of providers operate networks in several countries and offer rates similar to those charged in the home country. Examples of such plans include MTN Seamless Roaming, Zain One Network. However, customers do not have wide access to such plans throughout the east Africa region and will still face high charges if they roam onto other providers' networks.

Data and voice Roaming

Charges for Internet data and voice roaming are generally much higher than domestic Internet data and call charges. bellow table is an overview of prices of roaming in the region ,

Country	Data Roaming per MB (USD)	Voice roaming per one minute (USD)

3. BETTER ACCESS TO CONSUMER INFORMATION

3.1 Overview of access to information

In the context of complex charging arrangements and customers exposure to high RMR rates discussed in section 1, it is important for carriers and regulators to warn consumers to be aware of the risks associated with using their mobile devices while in the region.

For consumers to be in a position to determine the best roaming service for their needs when travelling abroad, clear and comprehensive information should be easily accessible. This information includes, but is not limited to, the charging structures for different mobile service providers and how best to manage those charges.

Consumers should also be able to access easily understood information that allows them to determine the most suitable solutions for their requirements and how to configure their mobile devices to access them.

There are various means for providers to disseminate information on RMR to consumers. When determining what information to provide, it is important to consider the best conduit to present this information to consumers. This section highlights some of the relevant information that regulators and mobile service providers are encouraged to make available to consumers to improve their awareness of roaming pricing structures and to avoid “bill shock”.

3.2 How information is currently provided to consumers

The table below provides how pricing information can be presented to consumers in different EACO countries:

Information provided:	By roaming service provider
On a website	

Through a web portal comparing different carrier's prices	
Via SMS messages detailing retail prices on the visitor's arrival	
Other (please specify)	

1. SIMPLE PUSH

User receives a welcome SMS with information on how to gather data on roaming prices.

A link to a website or paper materials distributed at points of interest could be envisaged.

2. SIMPLE PULL

User decides whether to send an SMS to (or call) a universal number that provides information on roaming charges via SMS.

3. FREE "PULL"

Envisaged by the current proposal Home MNOs offer a free SMS/voice-call service to their customers, and constantly update them about (significant) changes in roaming charges.

4. ADVANCED PUSH

Users receive a welcome SMS with information on the recommended network partner, then choose their preferred network and receive an SMS with tariff plans for its tariff scheme.

5. HYBRID PUSH/PULL

Users receive a welcome SMS which offers the opportunity to send an SMS to gather information on available prices for the user's tariff plan or ways to opt-in to *ad hoc* pricing schemes for travellers.

Concluding remarks on transparency

The transparency measures contained in these regional roaming charges would exert an unclear impact on consumers and operators.

Given the significant development costs for most MNOs especially in countries where pre-paid customers prevail, the free provision of tariff information may lead informed roamers to subsidise uninformed ones.

If the costs of setting up the service cannot be recovered, this may lead either to an increase in domestic charges or to a reduction in investments.

Overall, the regulation may also lead to cross-border industry consolidation and alliances, and a loss of valuable service differentiation. On the operators' side, there seems to be no need to increase the transparency of IOTs. This may, if anything, stimulate collusive bargaining if costs are below the caps selected by the Commission.

Overall, if retail and wholesale caps are maintained in the final proposal, any requirement to impose costly transparency measures free of charge should be carefully considered under the proportionality principle: if price caps are meant as “safety nets” for consumers, then the opportunity to gather additional tariff information should not necessarily be offered for free. Likewise, with burdensome transparency measures in place, the need to impose retail price regulation becomes less evident.

3.3 What information should be provided to consumers

Regulators are encouraged to ensure information is available to consumers on every mobile network active in their respective economies. This information should include RMR service packages for each mobile service provider and any information available on their partner networks abroad.

Further, mobile service providers are encouraged to provide information to consumers on charges for all different roaming call types, messaging and data services. Service providers should supply information on prices charged for roaming onto partner providers’ networks abroad and whether they are able to voluntarily select particular networks over others. Information should also indicate that charges may fluctuate due to exchange rates and depending on the networks upon which their device roams.

2.5 The best practice is the following

SMS/MMS or voicemail on arrival at an international destination

Upon arrival to a new economy, an SMS/MMS or voicemail message should be sent by the originating service provider that clearly explains the charging rates of their partner providers in the destination economy as well as various roaming service options. The message should provide information on how customers can change their preferred roaming network. The message should also contain a customer service telephone number of the provider from which service charges and further roaming information can be obtained.

Use of SMS messages and the carrier websites

Mobile phone providers are encouraged to utilise SMS and the Internet to provide their customers with an option to access information on account balances and service charges via a handset at no or minimal cost to the consumer.

Access to the account balance should allow customers to receive a break-down of service use, including individual calls and data use. Price information should include cost of all services, including voice calls, messaging, data and termination charges of both the home network as well as the roaming network.

Point of sale or activation of service

Information should be provided to customers either at the point of sale of a mobile service or upon the activation of the mobile service. The information should direct the customer to further detailed information outlining roaming service conditions, options and charges as well as any requirements to activate the roaming service.

3.4 Emerging technology and regulatory issues

Regulators are encouraged to monitor and provide information targeted at consumers on methods to reduce roaming charges as well as emerging technologies that could act as substitutes for roaming (see section 3 below).

Regulators are also encouraged to provide consumers with information on any changes to the regulatory environment both domestically and regionally that would have an impact on the charges and conditions associated with roaming services.

SUBSTITUTE TECHNOLOGIES

3.5 Alternatives available to consumers

Viable alternatives exist that are generally more cost-effective than RMR.

In most cases, these substitutes have some disadvantages over roaming. Issues such as the customers' phone number becoming inaccessible, forcing calls to be made from a fixed location, loss of coverage, increased complexity to dial a number, decreased voice quality and loss of access to contacts are examples of the problems associated with substitute technologies. However, these substitutes are an effective means of avoiding 'bill shock' and consequently, many customers choose to use them.

Regulators are encouraged to provide information on substitute technologies and to make these available to their own citizens and to foreign visitors.

3.5.1 Restrictions on mobile services

Restrictions can be placed while roaming so that non-emergency voice calls are barred and only SMS, MMS or voicemail services function. This can limit the high charges applied to roaming calls whilst allowing the use of text, multimedia or voice messaging to communicate.

3.5.2 Local pre-paid SIM cards

Pre-paid SIM cards purchased in the local country generally offer cheaper calling and data rates than using a roaming service. The main disadvantage of using a locally bought SIM card is that a different phone number must be used. This means that incoming calls and messages to the user's original phone number will no longer get through to the consumer except when they insert the original SIM card. To get around this, a recorded message can be left on your home mobile number, providing your new mobile number abroad. Voice mail can also be set up so that it can be accessed from another phone. A similar alternative would be to use a dual SIM card handset, or two handsets.

3.5.3 Multiple SIM card mobile handsets

Dual SIM card phones allow two or more SIM cards to be inserted into one mobile handset. Dual SIM card phones can be a cost-reducing alternative to roaming. However, costs for receiving calls can still accrue and many handsets only allow a single SIM at any one time.

3.6 Substitutes are often inconvenient

Although the substitutes described above may be more cost effective than roaming, the time required to search for and purchase alternative services can, at times, outweigh the benefits. Language barriers and the inconvenience of not having all the services available to when connected domestic providers all impact on the quality of services consumers ordinarily expect.

Consumers should also be aware that if they choose to use their phone for RMR, they need to check whether their phone is SIM locked or network locked.

If the handset is locked in any way, they should arrange for it to be unlocked by the provider or use a different handset.

CONCLUSION

RMR is a vital communication service used by many people who travel abroad. Yet the charges when roaming remain relatively high in comparison to calls that are made at standard international call rates. This is of concern to both consumers and hinders the economic integration of the EACO region.

Aside from considering approaches to regulating the roaming market, it is believed that steps can be taken to improve current service arrangements. As a short term goal, roaming service providers should improve the transparency of their pricing structures and provide clearer, targeted and transparent information to their customers when or before they roam regionally. In the medium to long-term, better consumer awareness and choice would likely encourage market competition and may have a downward effect on roaming charges.