

Consumer Council of Fiji



Submission to Commerce Commission

Review of the Control of Substantial Market Power for Interconnection Services in the Fiji Islands

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The Consumer Council of Fiji exists to safeguard the interest of consumers in the market place and aims to build a conscious and assertive consumer movement in Fiji.

1.0 Introduction

- 1.1 The Consumer Council of Fiji welcomes the opportunity to make a submission to the Commerce Commission ('the Commission') on the *Review of the Control of Substantial Market Power for Interconnection Services in Fiji* from consumers' perspective.
- 1.2 The Consumer Council of Fiji is a statutory body established under the Consumer Council of Fiji Act 1976 (Cap 235). The Council provides the external pressure as a watchdog to create a fair and just delivery of goods and services. It represents and protects the rights and interests of consumers and in particular the disadvantaged groups, rural poor and women by identifying and articulating the policy issues that are of importance to the consumers. First and foremost, the Consumer Council is an advocacy organization, conducting rigorous research and policy analysis on key consumer issues. Council's insight into consumer need is a powerful tool for influencing decision-makers to bring about change.

2.0 Recent History of Telecommunications Sector in Fiji

- 2.1 The Government of Fiji understands that a modernized telecommunications system is central to the economic development of the country where competition and economic liberalization (or de-regulation) of telecommunications sector is key to achieving potential economic benefits, provided access to telecommunication services are cheaper, efficient and affordable.
- 2.2 The Council's reservation and strong objection against removal of price control without having consumer protection mechanism in place was ignored despite growing number of consumer complaints against unethical trade practice, sub-standard and inefficient service delivery. Ultimately, the telecommunication sector was deregulated on the pretext that competition in the open and free marketplace would create the necessary conditions for viable and cheaper products and services that would eventually benefit the consumers through a wider selection of choice. However, market practices can completely nullify the benefits of competition where unscrupulous players can resort to anti-competitive practices for short-term gain through collusive behaviour or abuse of dominant position. The Council believes that deregulation will work only when effective consumer protection laws are enforced.
- 2.3 Fiji's market condition is not perfect for competition to thrive. We live in an imperfect market condition. Successive governments have been very quick in introducing market mechanism to change the outlook of the country's economy, but at the same time they have ignored its impact on the people by not putting in place effective consumer protection measures.
- 2.4 Last year corporate monopolies (at the time) like Vodafone Fiji Limited (VFL) recorded phenomenal profit after tax and notably, there has been never a period of loss in the telecommunication business recorded by the ATH players.

2.5 **Table 1 and 2** below illustrates the level of consolidated net profits and sales revenue for the telecommunication industry for 2007 and 2008.

Table 1: Consolidated Net Profit after Tax & Minority Interest for the year ended

For the Year Ended	Vodafone	Xceed	Transtel	TFL	ATH	Fiji Directories	Tech Park	Connect
31/03/07	48.4%	1.1%	15.8%	8.5%	10.2%	2.6%	0.3%	4.3%
31/03/08	40%	5.7%	1.0%	42%	9%	5.3%	(0.1%)	(2.9%)

Source: ATH 2007 & 2008 Annual Report

Table 2: Consolidated Sales Revenue for the year 2008

For the year ended	Vodafone	Xceed	Transtel	TFL	ATH	Fiji Directories	Connect
31/03/07	41.8%	3.5%	9.6%	37.3%	2.2%	1.3%	4.3%
31/03/08	42.9%	3.4%	9.3%	35.5%	2.0%	2.7%	4.2%

Source: ATH 2007 & 2008 Annual Report

2.6 This financial health of the industry players substantiates the reality that this particular industry has benefited at the expense of poor service to consumers where checks and balances in the marketplace is weak and/or non-existent.

3.0 Deregulation & its Impact on Consumers

3.1 The types of complaint against Telecommunication Service Providers are as follows:

- **Tecom Fiji Limited (TFL)** - complaints ranged from forcing consumers to switch to Easytel, bills received for disconnected lines, poor phone services, poor quality of telephones, services converted without knowledge and authorization of the customers and defaulting customers names forwarded to Data Bureau without customer knowledge.
- **VFL's** - complaints include: false advertising, poor quality phones, poor text messages services, expired recharge cards sold to customers and so forth.
- **Digicel** - complaints also include false advertising, poor information delivery to customers and poor quality of phones (obsolete brands).
- **Internet Service Providers** - The common problems faced by consumers against the internet service providers are: the frequent dropping of internet connection, slow speed, customers given a run around by Connect (consumers are asked to contact Telecom) when the problem is internet services, and misleading advertisement.

- 3.2 Deregulation only has worked in the favour of the operators to cement their ability to grow and further exploit consumers in a *free and open* marketplace by selling obviously **limited choice** – two players for mobile phone service is no real competition (Inkk is not a competitor to Vodafone) while landline service provider, TFL remains in total control of the marketplace with no competition at all.
- 3.3 The question that arises as to why consumers should be paying higher prices for such poorly serviced industry. Clearly, this is largely due to poor enforcement of Fair Trading Act, Commerce Act and unclear regulatory function of the **Telecommunications Authority of Fiji (TAF)** on market practices. The Council noticed that more time has been spent in deregulating the industry and setting the systems and processes but little consideration has been given to consumer redress system which should have been part and parcel of deregulation process.

4.0 Telecommunications Regulation and its Benefits

- 4.1 Telecommunications regulation was initially associated with the concept of telecommunications as a *“natural monopoly”*. For example, for many years Amalgamated Telecommunications Holding Limited (ATH) with its two important subsidiary companies, TFL and VFL has been dominating the telecommunications sector for landline (or fixed line) and mobile line services respectively. Connect is also seen in such a position for internet services in the Northern and Western division and interestingly, they all share a common kinship with ATH acting as the “natural parent”. FINTEL is also continuing its dominant position in the marketplace.
- 4.2 Nonetheless, it is not a disputed fact that Connect is still providing an essential communication service to most disadvantaged customers in the outer islands and isolated locations that other players like *Unwired Fiji Limited* or **Kidanet (100% owned by FINTEL)** has not stepped in to provide in the deregulated market. The concept of *universal and cheap service* is yet to be achieved under the deregulated sector. Perhaps, deregulation will give *Connect* some relief to pay reasonable bandwidth or interconnection charges to use FINTEL network and infrastructure through Southern Cross Cable so that they can also offer the kind of *unlimited service* as Kidanet is currently offering to its customers, but at a lesser cost. Having said this, business is still a commercial decision, where consumers pay a price for the products and services sold to them. Regardless of the constraints or problems in the marketplace, consumers should not be prejudiced or taken for a ride.
- 4.3 It seems that this is one area, the Commerce Commission must look into in order to ascertain **whether FINTEL is currently holding a substantial market power** and whether real competition should be introduced or encouraged as soon as possible to allow more players or existing operators to penetrate the market so that those with established infrastructure like FINTEL do not take advantage of their powerful, dominant position in the market. Further, policies should be developed to foster old and new players to enter market with less bureaucracy and cost factor involved until they can establish a sound and sustainable operations alongside players like FINTEL.

- 4.4 The question is then what has changed since deregulation and whether open competition has really impacted the sector to provide universal service through competitive products and services. We should also ask ourselves whether such “deregulated market” can be feasibly and lucratively sustained in our society and economy.
- 4.5 The Council feels that while deregulation of the sector is important, it has made some difference to the costs initially but with the 20% devaluation of Fiji dollar **in April**, and price control mechanism no longer applicable, has given the companies free hand to increase the price.
- 4.6 Consumers have sunk deeper into financial hardships and constraints where sustainable economic growth would virtually be unattainable in the long run due to low consumer confidence. The recent increase in prices of telecommunication products and services following devaluation has dampened consumer spirit and hope. For example, our price survey indicates that soon after deregulation, the operators/players tried to appease consumers through one-off competitive promotions which were short-lived as the fine print in the adverts suggest. Some vulnerable consumers were lured into false sense of security and cheaper costs when in fact they were legally trapped for a minimum period of time with the companies that offered products and services on contract basis. This means that consumers were charged early termination fees to exit contracts if they were dissatisfied with the service delivery or simply decided to exist the player for another if better choice was offered. VFL was seen doing this with prepaid customers who signed up on their “**0**” **rental deal** only to later find out that the 2 year minimum contract period was a strict condition for which an exit fee was charged in order to switch to the competitor Digicel, who was offering cheaper deals for their prepaid customers. Previously VFL had no reason to keep anyone on contract as they were in total control of the market.
- 4.7 The Council had advocated that price control mechanism with close monitoring of anti-competitive conduct had its benefits with the regulator maintaining vigilance on market practices as was required when the sector was not liberalized.
- 4.8 Accordingly, it would seem that **open and free market competition** may have been created in haste because the prices have not reflected the much anticipated low and cheaper rates and charges as it would be prevalent in a true competitive environment. Consumers have not seen any **genuine** attempt by dominant, monopoly players of many years such as VFL to make any headway in creating competitive prices for products and services other than one-off promotional activities to retain the loyal customers. Signing of contracts has become a feature to practically force consumers to stay with them.
- 4.9 Therefore, the dynamic characteristics of the telecommunications sector make it imperative for relevant policies to be reviewed regularly. To that end, the review by Commerce Commission could not have come at an opportune time when devaluation of Fiji dollar is having adverse economic and social impact on consumers of Fiji. In fact, prices of almost all products and services in the market has risen, including in the telecommunications sector.

- 4.10 From consumers' perspective, they want reduced charges for the products and services advertised and sold in the market by telecommunications industry, including efficient, reliable, honest and affordable service delivery or simply, **value for the money**.
- 4.11 Misleading and deceptive products and services are also rife in the market where unconscionable conducts via misleading advertisements tend to worry the Council. Recently **Connect** advertised its wireless internet product for “**a \$1 a day**” - the consumers complaint that it was misleading because they had to spend \$180 for the modem to qualify for the service. Upon investigation, Connect corrected the advertisement – (see **annex 1**).
- 4.12 Therefore, consumers will always need protection from unfair trade practices and so, remedy against consumer grievances and complaints through an independent redress mechanism or **Telecommunications Ombudsman** must become an integral part of the telecommunications sector which is currently non-existent.
- 4.13 For Council, this review is not about how the “technical” aspect of the industry is working or how a feasibility study will improve it. Our issue is lack of interest showed by all players in the area of consumer protection and remedy which must be paramount to industry and the government alike. Detecting and punishing telecommunication service providers engaged in unfair trade practices should then become a key feature of a ‘open and free market’ competition.

5.0 Consumer Issues for the Submission

- 5.1 The Commerce Commission has called for submission from stakeholders where the Council is purely basing its views/recommendations for any change that protects consumers' interest in the marketplace.
- 5.2 The Council will use the following order to highlight consumer issues:-
- i. whether any player has substantial degree of market power;
 - ii. whether there is genuine competition in the marketplace in the de-regulated environment and whether competition is conducive in the geographic and market structure (see: recommendation); and
 - iii. whether a Regulatory Impact Assessment is necessary (see: recommendations)

6.0 Whether any player has substantial degree of market power?

- 6.1 The Commerce Commission has reason to believe that the advancement of objectives in **section 3 of the Telecommunication Promulgation 2008 (TP2008)** is not adequately assured by prevailing market conditions.

- 6.2 As stated earlier, it is Council’s position that TFL is still dominating the telecommunications sector, being the only landline (or fixed line) service provider in Fiji. Due to their infrastructure dominance for many years, they are still setting the rules for pricing as seen recently with Digicel attempting to access their network to allow their customers to call on landlines. Despite an interconnection deal was agreed into, the fact remains TFL has the power to set the price. Further, if consumers complaint to TFL, and they keep pleading “technical” problems, then consumer has no choice to switch to another player and so, they are literally made to put up with the poor service delivery.
- 6.3 Connect, is also dominating internet services in the Northern and Western division but one hopes that more player will enter and compete soon to provide universal service to all the people of Fiji. Interestingly, they all share a common kinship with ATH. Therefore when consumer is faced with any difficulties or issues relating to poor service delivery, he/she is made to revolve around ATH’s family tree, i.e., from Connect passing the buck to TFL and so on. Such tactics in the market is causing consumer frustration and increase in consumer complaints to deal with.
- 6.4 Similarly, FINTEL is also continuing its dominant position in the marketplace and enjoying a substantial degree of market power. FINTEL is charging exorbitant sum of money to allow CONNECT to use the gateway while KINDANET is competing with CONNECT by offering “unlimited use” and offers its service in urban areas only to reduce costs.
- 5.1 From consumers’ perspective, the particular aspect of **section 3 of TP2008** that concerns the Council is stated in **section 3(d)** that alludes stakeholders (operators/consumers) and the regulators (Commerce Commission & TAF) to take heed of **consumer protection** as part of the legal and regulatory framework pertaining to telecommunications sector. Section (3d) states that:

*“The objectives of TP2008...
...is to provide and promote appropriate consumer protection and other safeguards in relation to telecommunications services where market forces are insufficient.”*

- 5.2 Therefore, consumer protection should not be overlooked with only the need to ensure that the telecommunications industry is able to cope with the newfound, deregulated and liberalized market. Commerce Commission should consider Council’s submission complementary to technical issues that will be raised by the industry to answer the questions posed by the Commission. Rather our submission must be read to supplement the move towards market economy which necessitates consumer protection as a pre-requisite.
- 6.0 Whether there is genuine competition in the marketplace in the de-regulated environment and whether competition is conducive in the geographic and market structure**

- 6.1 At the outset, the Council maintains its stand that Fiji does not offer the best environment for genuine competition due to several limitations such as population size, population dispersed on several islands, VFL over the years build its empire through high cost to consumers and yet receiving government subsidy in the form of tax rebate etc etc.
- 6.2 The Council strongly believes that dominant players who have been in the market for more than a decade such as TFL are still enjoying a substantial degree of market power. This is simply reflected in the price dominance – for example, Digicel consumers were complaining about the off-net charges and we know that old and established players like TFL were setting the benchmark. So actual competition has not come about despite promises through deregulation to create cheaper array of products and services because the market condition is such that dominant players like TFL will always influence pricing.
- 6.3 Further, being a long time monopolist, TFL, VFL or FINTEL have unfair advantage with the already established infrastructure network and a brand name. They do not need to compete to sell their products and services as the new entrants are doing. Of course, they are doing their best to retain consumers as much as possible through devious means such as trapping via contractual relationships but consumers are fast becoming aware of their tactics and only time can educate consumers.
- 6.4 Council is confident yet worried that when players have run out of devious tactics and strategies to trap consumers, they will basically join hands in a cartel-type relationship. In fact, despite only 3 months into the deregulation phase, the Council is noticing a certain conception of unfair market practices in the mobile phone service industry that is leaning towards market sharing or collusion (**see below: Table 5**), which is expected if the new entrants are cornered to generate competitive prices when the old players with existing clientele base are least bothered.
- 6.5 Digicel is struggling to build infrastructure and clientele base while VFL has not taken any concrete steps to provide consumers with competitive prices. The reality is that there are a little over 800,000 people or consumers’ in Fiji that can only be shared two or three ways.
- 6.6 The importance of price determination cannot be under-valued. For example, **Table 5** below demonstrates that the deregulation has not brought about the level of competitive pricing one had hoped for. Finally the players have settled for a price that they seem to agree on.

Table 5: Comparative analysis of mobile charges by two major players

Operator	Service	Entry of Digicel (Oct-Dec 2008)	Talks on Deregulation (Jan-Mar 2009)	Post-deregulation (Apr – Jun 2009)
Vodafone	Peak hours	54 cents per min	30 cents per min	50 cents per min
Digicel	Peak hours	40 cents per min	40 cents per min	50 cents per min

Source: Mass media publications/advertisements and internet research conducted by Consumer Council of Fiji.

7.0 Council's Overall Recommendations

Regulate Effectively through Controlled Competition

- 7.1 It is Council's observation that due to our imperfect market conditions, **effective regulation through controlled competition is critical** to manage the infrastructure services, particularly in terms of monitoring any anti-competitive conduct as well as to accord consumer protection and remedy in case of unfair trade practices.
- 7.2 Whilst it is true that telecommunications sector is no longer considered a monopoly industry, in Council's opinion, owners of telecommunications networks like FINTEL, VFL and TFL continue to maintain a substantial degree of market power that, if not properly regulated, may be used to the detriment of their competitors and consumers.
- 7.3 For example, early this year, it was brought to Council's attention that Vodafone had explicitly ordered one media outlet (The Fiji Times) not to publish any advertisements by Digicel who was making price comparisons with the competitors to better inform consumers to make wise choices in the marketplace. This issue was brought to the attention of Commerce Commission to investigate any anti-competitive conduct by VFL (**see Annexure 2 & 3 - our letter to Commerce Commission and media article respectively**). VFL has enjoyed 14 years of exclusive trading under the monopoly regime and for them to obstruct free advertisements as long as it was based on facts and truth, is an indication that they continue to prevent new entrants from effectively competing and offering consumers choice and access to information they deserve.
- 7.4 As stated, Fiji's market size, structure and population (or the consumer base) has its limitations preventing any feasible or lucrative expansion of, particularly mobile phone industry where entry of more players cannot be effectively experienced in real terms of creating level playing field for all the stakeholders, including consumers. Competition is not something that will easily happen even in the deregulated scene, therefore the open market concept must be re-looked at to cater the needs of everyone, especially consumers. Currently, there is an imperfect market condition where other players would be reluctant to enter the market due to the limited "space in the marketplace" to compete. If they did, it would result in "financial death" of the existing players or the new ones entering the market to even consider the possibility. The new players will "cherry pick" areas where they will make maximum profits.
- 7.5 Anti-competitive behaviour through market-sharing and collusion is normally the end result of such limitations. Telecommunication regulation is then imperative in the environment within which we thrive as an economy and consumers need protection and remedy to be able to confidently spend their money on services and products that offer them full "customer satisfaction".

Maintain Vigilance on Interconnection Arrangements

- 7.6** It is within the powers of the TAF or Commerce Commission to regulate interconnection. It is an objective of Government policy for telecommunications infrastructure to develop as a network of interconnected networks. Thus it is incumbent upon **all operators to negotiate in good faith** with each other to establish reasonable and equitable interconnection agreements.
- 7.7** All interconnection agreements should be provided to the regulators in the interest of transparency, which they should review to ensure that competing operators have comparable interconnection terms. TAF or Commission should also make a priority to preside over any dispute between operators regarding interconnection and they should effectively regulate access charges following the terms of charging policy as established by the **TPA2008**.
- 7.8** Apart from dealing with administrative matters, consumer complaints must be also effectively addressed and operators pulled up for any non-compliance. Attached is a complaint by a VFL consumer where he is raising the issue of call termination service provided by Digicel (**see Annexure 4 & 5 – complaint to the Council and letters to editor respectively**). The Council had several meetings with Digicel on this matter and they had assured us that they would look into the issue of providing consumers with the facility to terminate calls without a charge as apparently VFL is providing by default. We were assured that Digicel’s technical team would fix the problem/issue as it required some technical re-structuring but to date they have not done this or informed us that it has been done.
- 7.9** Council believes it is an important to provide a **call termination service free of charge** in order to give consumers a choice as to when they want to be charged despite international conventions allow for such charges as Vodafone NZ is doing in New Zealand.
- 7.10** In terms of interconnection charges, this was raised in connection to this complaint/issue and VFL denied bagging any money when in fact they pass the interconnection fees paid to Digicel onto their consumers as part of the retail charges that their customers pay for the Vodafone services and products. We all know that interconnection agreements between both operators allow each other to access network respectively. So really it depends how Vodafone negotiates with Digicel to provide this particular service to ensure their consumers do not suffer or get passed unfair interconnection cost. It is also Commerce Commission’s duty and responsibility to asses that the interconnection charge is fair in the commercial interest of the parties as well as reasonably fair to consumers.

7.11 However operators must not mislead consumers that they have nothing to do with interconnection charges. In fact, education will ensure that they have better understanding of the retail price they pay which is inclusive of interconnection charges. This is where perhaps, price control walks in to ensure that unfair costs are not passed onto consumers.

Implement Universal Service or Access

7.12 The current consumers of internet service in the Northern and Western division are suffering because deregulation's objective to provide access to basic telecommunications services at reasonable costs around Fiji including in the rural and the Outer Islands has not materialised. Government policy must ensure that a universal service is offered with the cheapest rates and charges to meet this end where all operators in the country must have a universal service obligation as part of their licence requirement.

7.13 The universal service obligation should be structured as a contribution to a fund which should be managed and implemented by the TAF so that more players (new and old) can go out in the isolated regions and expand info-communication culture that is currently missing. The universal service requirements must be determined in accordance with the contributions collected from operators and used to support projects bringing service to users in remote areas.

Assess Numbering and Number Portability

7.14 Numbering is a critical issue in promoting fair competition. The numbering plan must be allocated equitably across operators, since favourable numbering arrangements will provide a competitive advantage.

7.15 Another issue pertaining to numbering is number portability, which would enable a user to migrate from one operator to another without changing his telephone number. Consequently, numbering is a serious policy issue, to be addressed by the State and the Regulators which is currently not in place.

8.0 Specific Recommendation for Effective Regulation

8.1 We know that based on the dynamic economics of the telecommunications sector, the role of regulation has shifted in the past two decades, especially in the current deregulated environment. Under deregulated regime, the regulator is more concerned with interconnection of networks, disputes between operators, wholesale tariffs (including access charges) and keeping up with new products and services. Consumer protection and remedy is no longer a priority as expected.

- 8.2 The Council agrees that the right balance is required to ensure that the role of the regulator does not become so intrusive that the regulator is essentially managing the operator's business. Regulation is for monitoring the industry practices and to deliver consumer protection. Council believes that proper regulatory systems make regulators and operators accountable to the public or consumers. Regulation is then essential because we live in an imperfect marketplace where consumer protection is important if the operators want to sustain long-term operations.
- 8.3 Regulation hence must be independent, transparent, and well publicised. In order for the regulator to successfully implement telecommunications policy by managing the business environment faced by the operators, it must be independent of both policy-makers and the operators.
- 8.4 Under the **TPA2008**, independence from operators is achieved through the establishment of a separate entity to serve as a regulator. **Telecommunication Authority of Fiji (TAF)** has been conceived for this purpose along with consumer protection in mind, however, it is early stages to comment whether effective consumer protection and remedy would become in-built feature of the Authority. Last year, State stakeholders involved in setting up the regulatory body converged to discuss the administrative, technical and regulatory framework of TAF with the players/operators including the Council. **Consumer protection was last on the agenda and is yet to materialise.**
- 8.5 The Council intends to stress the importance of this body which has the legislative and regulatory function under the **TP2008** to administer and regulate operator's license and other administrative affairs including collaborating action with Commerce Commission to provide necessary information on the economic status of the players in the market, particularly in terms of their market position to determine whether competition is legitimate and thriving. TAF will be useful in ascertaining any anti-competitive behaviour between the players, say if a dominant player obstructs license or other administrative requirement of a competitor.
- 8.6 In fact, TAF can be expanded in its responsibility to look into issues concerning consumer grievances under a separate independent redress body such as a sector-specific, **Telecommunications Industry Ombudsman (TIO)**. Such bodies are international convention as seen with India, Australia, UK, America, etc. Such scheme is mostly established under a law and the TIO is independent of industry, the government and consumer organizations. The TIO is normally authorized to investigate complaints about the provision or supply of telecommunication products and services. One of the advantages to the consumers is that the TIO aims to settle disputes quickly in a fair, objective and non-bureaucratic manner, having regard not only to the law and to good industry practice, but also to what is fair and reasonable in all the circumstances.

8.7 The TIO has the authority to make legally binding decision. Offences and penalties are in-built features and fines can be imposed on perpetrators to deter violation of consumer rights.

8.8 *Telecommunication Ombudsman of Fiji*, if created would be the answer to addressing consumer grievances and redress in entirety without duplicating roles and functions of TAF or Commerce Commission.

9.0 Conclusion

9.1 The complexity of regulatory issues has grown with the complexity of the telecommunications business. With deregulation in March this year, it seems that the regulator is not concerned with consumer protection and remedy whereas it is Council's request to the government and regulators that regulation should be designed to appreciate that consumers are an important link to the industry because without them there would not be a commercially viable, industry or trade operations at all.

9.2 A key responsibility of the regulator should be to ensure that operators feel the pressure to meet the needs of the users/consumers: for example, affordability, interconnection availability and quality of service. After all, the pressure for operators to provide adequate service is a commercial one since users provide the financial return that is the objective of commercial operations.

9.3 The roles and functions of TAF will be to ultimately ensure that through effective and true competition, a fair level playing field is created for all stakeholders in the marketplace, especially consumers.

This is Consumer Council of Fiji's Submission.

Yours sincerely

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