

# **NATIONAL COMMUNICATIONS AUTHORITY**



## **CONSULTATION DOCUMENT ON THE DRAFT FRAMEWORK FOR REGULATING THE NATIONAL ROAMING WHOLESALE RATES**

**MARCH 2026**



# NATIONAL COMMUNICATIONS AUTHORITY

## INVITATION FOR COMMENTS

1. The National Communications Authority (NCA) intends to introduce a regulatory framework for the determination of national roaming wholesale rates to support the implementation of remedial measures arising from the Significant Market Power (SMP) declaration in the mobile telecommunications market.
2. Accordingly, in pursuance of its mandate under Section 3 and Section 25 of the National Communications Authority Act, 2008 (Act 769) and Section 4.1 of the National Telecommunications Policy, 2005 (NTP'05), the Authority hereby invites views and comments from licensees, service providers, industry stakeholders and the general public on the proposal to introduce a regulator-led determination of wholesale rates for national roaming services, which is intended to replace the current bilateral roaming arrangements between operators.
3. The public consultation shall commence with immediate effect and will remain open for **four (4) weeks**, expiring on **3<sup>rd</sup> April, 2026**.
4. All responses and comments should be submitted electronically as email attachments in Microsoft Word format to [nroamingresponse@nca.org.gh](mailto:nroamingresponse@nca.org.gh), with a copy to [dgsecretariat@nca.org.gh](mailto:dgsecretariat@nca.org.gh).
5. Respondents are requested to use the **consultation response template** annexed to this document when preparing their submissions.
6. It would be helpful if responses clearly indicate the **sections of the consultation document with which respondents agree or disagree**, together with supporting explanations or evidence where appropriate.

### Confidentiality

7. In the interest of transparency and openness, the Authority will treat all submissions as non-confidential and may publish responses received as part of this consultation on its website at [www.nca.org.gh](http://www.nca.org.gh).
8. Respondents should therefore avoid including confidential or commercially sensitive information in their submissions. Where confidentiality is claimed for specific information, respondents should clearly identify such information and provide a non-confidential summary where possible.
9. Copyright and all other intellectual property rights in submissions received in response to this consultation shall be deemed to be licensed to the Authority for the purposes of fulfilling its statutory and regulatory responsibilities.

### Next Steps

10. Following the conclusion of the consultation period, the Authority will review all submissions received and may engage stakeholders where necessary before issuing the final regulatory framework for national roaming wholesale rates.

**Issued by the Director General**  
National Communications Authority  
9th March, 2026

## EXECUTIVE SUMMARY

The National Communications Authority (NCA) is responsible for regulating the electronic communications sector in Ghana in accordance with the Electronic Communications Act, 2008 (Act 775). In carrying out its mandate, the Authority seeks to promote fair competition, protect consumer interests and ensure the efficient use of telecommunications infrastructure.

In June 2020, the Authority declared MTN Ghana as having Significant Market Power (SMP) in the mobile telecommunications market. As part of the remedies introduced following the SMP declaration, the Authority mandated national roaming arrangements among mobile network operators to address coverage disparities and enhance competition.

National roaming enables subscribers of one mobile network operator to access telecommunications services on another operator's network within the same national territory. This arrangement allows operators with limited network coverage to provide service to their customers in areas where they have not yet deployed infrastructure.

Implementation of national roaming arrangements commenced in 2022 through bilateral commercial agreements between operators. While these arrangements have facilitated service continuity and improved network interoperability, concerns have been raised regarding:

- the level of wholesale roaming charges
- variations in pricing across bilateral agreements
- the potential impact of wholesale charges on retail competition.

In response to these concerns, the Authority is initiating this consultation to seek stakeholder views on the introduction of a benchmark-based framework for regulating national roaming wholesale rates in Ghana.

The proposed framework seeks to promote:

- fair and effective competition among mobile network operators
- efficient utilization of existing telecommunications infrastructure
- improved service availability for consumers
- transparent and predictable wholesale roaming pricing.

To determine the proposed wholesale roaming rates, the Authority undertook an analytical review involving:

- an assessment of prevailing retail tariffs of the Significant Market Power (SMP) operator
- a review of existing wholesale roaming rates contained in bilateral agreements between operators
- an evaluation of the relationship between retail tariffs and wholesale roaming charges to prevent conditions that could give rise to margin squeeze.

Based on this analysis, the Authority has derived benchmark wholesale reference rates for national roaming services covering voice, SMS, data and USSD services.

*Table 1: Proposed Wholesale National Roaming Rates*

<b>Service Category</b>	<b>Service Type</b>	<b>Proposed Wholesale Rate (GHS)</b>
Voice Service	Mobile Originated (MO)	0.0053 per minute
Voice Service	Mobile Terminated (MT)	0.0053 per minute
SMS Service	Mobile Originated (MO)	0.00003 per SMS
SMS Service	Mobile Terminated (MT)	0.00003 per SMS
Data Service	Data Usage	0.0032 per MB
USSD Service	USSD Session	0.00003 per USSD session

These proposed rates are intended to serve as **reference wholesale ceiling rates** that will guide national roaming agreements between operators.

The Authority will review stakeholder submissions and may refine the proposed framework before issuing the final regulatory guidelines.

Stakeholders are invited to provide written comments on the proposed framework, including the methodology used and the proposed wholesale rates.

The Authority encourages all interested parties to participate in this consultation process.

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# CHAPTER 1

## 1.0 INTRODUCTION

### 1.1 Background

The National Communications Authority (NCA) is mandated under the Electronic Communications Act, 2008 (Act 775) to regulate electronic communications networks and services in Ghana in a manner that promotes:

- fair and effective competition
- consumer protection
- efficient use of communications infrastructure
- sustainable development of the telecommunications sector.

In exercising this mandate, the Authority conducts its regulatory activities in a transparent, open and consultative manner consistent with Act 775 and the National Telecommunications Policy, 2005 (NTP'05).

Under Sections 3, 20, 24 and 25 of Act 775, the Authority has the power to regulate interconnection and access arrangements between electronic communications networks where intervention is necessary to promote competition, ensure efficient use of infrastructure and protect consumer interests.

In June 2020, the Authority declared MTN Ghana as having Significant Market Power (SMP) in the mobile telecommunications market. As part of the remedies introduced to address market imbalance, the Authority mandated national roaming among mobile network operators.

National roaming enables subscribers of one mobile network operator to access services on another operator's network within the same national territory, particularly in areas where their home network does not have coverage.

Implementation of national roaming arrangements commenced in 2022 through bilateral commercial agreements between operators. While these arrangements have facilitated service availability and network interoperability, concerns have been raised by some operators regarding:

- high wholesale roaming charges
- lack of transparency in pricing
- variations in rates across bilateral agreements.

In response, the Authority is initiating this consultation to seek stakeholder views on the introduction of a benchmark-based regulatory framework for national roaming wholesale rates.

### 1.2 Policy Context and Rationale

Differences in network coverage and infrastructure investment among mobile network operators have created competitive asymmetries within the Ghanaian telecommunications market.

Operators with extensive infrastructure deployment may enjoy wider coverage and economies of scale, while smaller operators may face challenges expanding network infrastructure at the same pace.

National roaming arrangements can therefore serve as an important regulatory tool to:

- enhance competition
- improve service availability
- promote efficient utilisation of telecommunications infrastructure.

However, where wholesale roaming charges are determined solely through bilateral negotiations, pricing outcomes may reflect differences in bargaining power between operators rather than efficient market outcomes.

A transparent framework for determining wholesale roaming rates can therefore help to ensure that such rates remain reasonable, predictable and supportive of sustainable competition.

### 1.3 Scope of this Document

This consultation document presents the Authority's draft framework for regulating national roaming wholesale rates in Ghana.

The document outlines:

- the methodology used to determine benchmark wholesale roaming rates
- the services covered under national roaming arrangements
- proposed reference wholesale rates
- compliance and enforcement mechanisms.

The proposed framework seeks to achieve the following objectives:

- **Promote Fair and Effective Competition**  
Ensuring that all mobile network operators have reasonable access to national roaming services.
- **Encourage Efficient Use of Infrastructure**  
Facilitating the use of existing network infrastructure rather than unnecessary duplication of network investments.
- **Support Sustainable Investment**  
Ensuring that host operators receive reasonable compensation for providing roaming services.
- **Prevent Anti-Competitive Conduct**  
Mitigating risks such as margin squeeze and discriminatory pricing.
- **Protect Consumer Interests**  
Improving service availability, coverage and quality for telecommunications consumers.

## CHAPTER 2

### 2.0 EXISTING NATIONAL ROAMING ARRANGEMENTS

#### 2.1 Regulatory and Market framework

National roaming is widely recognised as a regulatory mechanism that can enhance competition in telecommunications markets where significant differences in network coverage exist among operators.

In Ghana, national roaming services are currently implemented through bilateral commercial agreements between mobile network operators. These agreements define the technical, operational and commercial conditions governing roaming services, including wholesale pricing arrangements.

While bilateral agreements provide flexibility, wholesale roaming rates are determined through commercial negotiations rather than through a regulated framework. In accordance with the Electronic Communications Act, 2008 (Act 775) and the National Telecommunications Policy, 2005, the Authority retains the mandate to intervene where necessary to ensure that access arrangements between operators support competition and consumer welfare.

#### 2.2 Existing National Roaming Data Rate Arrangements

As part of the Authority's review of national roaming arrangements, an assessment was conducted of wholesale roaming data rates currently applied in bilateral agreements between operators.

The review indicated that wholesale data roaming rates vary across existing bilateral arrangements. The analysis indicates that wholesale data roaming rates currently applied in bilateral agreements range between GHS 3.39 and GHS 5.30 per gigabyte, while roaming services provided through infrastructure deployed under the Ghana Investment Fund for Electronic Communications (GIFEC) rural telephony project are priced at approximately GHS 7.00 per gigabyte.

Based on this assessment, the Authority has proposed a benchmark wholesale reference rate of GHS 3.30 per gigabyte, which is broadly aligned with the lower range of existing bilateral roaming rates.

The proposed benchmark rate is intended to:

- improve transparency in wholesale roaming pricing
- ensure greater consistency across roaming arrangements
- support competitive retail pricing for mobile data services.

#### 2.3 Limitations of the Existing Bilateral Roaming Framework

Although bilateral roaming agreements have enabled network access, several limitations have been identified. These include:

- variations in wholesale roaming rates across operators
- lack of transparency in pricing structures
- potential imbalance in bargaining power during negotiations.

Where such conditions exist, wholesale roaming charges may not always reflect efficient market outcomes. Introducing benchmark wholesale rates can therefore enhance transparency, consistency and predictability in national roaming pricing.

#### 2.4 Margin Squeeze Risks

Margin squeeze may arise where an operator providing wholesale access to competing operators also competes with those operators in the retail market.

Margin squeeze may occur where:

- wholesale access prices are set excessively high; and
- the retail prices of the host operator remain relatively low.

Such conditions may limit the ability of operators relying on national roaming arrangements to compete effectively in the retail market. The Authority will therefore monitor the relationship between wholesale roaming charges and retail tariffs to ensure that wholesale pricing does not distort competition.

The Authority will therefore monitor the relationship between wholesale roaming charges and prevailing retail tariffs to ensure that national roaming arrangements support fair and sustainable competition.

## CHAPTER 3

### 3.0 FRAMEWORK FOR REGULATING NATIONAL ROAMING WHOLESALE RATES

#### 3.1 Methodology for Determining Wholesale Rates

The Authority applied a benchmark-based analytical approach to determine the proposed national roaming wholesale rates. The methodology involved:

##### **Review of Retail Tariffs of the SMP Operator**

The Authority analysed prevailing retail tariffs of the SMP operator for core services including voice, SMS, data and USSD.

Retail tariffs provide a useful reference point when assessing wholesale prices to ensure that wholesale charges do not undermine competition in the retail market.

##### **Review of Existing Bilateral Roaming Agreements**

Wholesale roaming rates currently applied in bilateral agreements between mobile network operators were also reviewed to understand prevailing market pricing structures.

##### **Assessment of Retail-Wholesale Price Relationships**

The Authority assessed the relationship between retail tariffs and wholesale roaming charges to ensure that wholesale prices remain sufficiently below retail tariffs.

This assessment was undertaken to prevent conditions that could give rise to margin squeeze.

##### **Determination of Benchmark Wholesale Rates**

Based on the above analysis, the Authority derived benchmark wholesale rates that:

- remain below prevailing retail tariffs
- reflect pricing observed in existing bilateral agreements
- support sustainable retail competition.

#### 3.2 International Benchmarking of National Roaming Charges

The Authority also reviewed regulatory approaches to national roaming in selected jurisdictions, including:

- United Kingdom
- India
- Kenya
- Nigeria
- South Africa
- the European Union.

In many of these jurisdictions, regulators have introduced mechanisms to ensure that wholesale access prices remain transparent and non-discriminatory.

While regulatory approaches vary across jurisdictions, international experience demonstrates the importance of regulatory oversight in ensuring that wholesale roaming arrangements support competition and infrastructure efficiency.

*Table 2: Some Regulatory Roaming Frameworks*

<b>Jurisdiction</b>	<b>Regulatory Authority</b>	<b>Relevant Pricing Framework</b>
United Kingdom	Ofcom	Regulated wholesale mobile access and interconnection
European Union	Body of European Regulators for Electronic Communications	EU wholesale roaming price caps
Kenya	Communications Authority of Kenya	National roaming regulatory framework
Nigeria	Nigerian Communications Commission	National roaming guidelines
South Africa	Independent Communications Authority of South Africa	Wholesale roaming access obligations
India	Telecom Regulatory Authority of India	Regulated interconnection and roaming frameworks

### 3.3 Scope of Services Covered Under National Roaming

The proposed wholesale national roaming framework shall apply to all mobile telecommunications services delivered through roaming arrangements between operators.

The services covered under this framework include:

- Voice Services (Mobile Originated and Mobile Terminated)
- Short Message Service (SMS)
- Data Services
- Unstructured Supplementary Service Data (USSD)

These services constitute the primary retail mobile services consumed by subscribers and are therefore critical components of a comprehensive national roaming framework.

The framework will also apply to roaming arrangements involving infrastructure deployed under the Ghana Investment Fund for Electronic Communications (GIFEC) Rural Telephony Project, which aims to expand connectivity in underserved communities.

### 3.4 Proposed National Roaming Wholesale Rates

Based on the Authority's benchmark analysis, the following reference wholesale rates are proposed.

*Table 3: Proposed National Roaming Wholesale Rates*

Service Category	Service Type	Proposed Wholesale Rate (GHS)
Voice Service	Mobile Originated (MO)	0.0053 per minute
Voice Service	Mobile Terminated (MT)	0.0053 per minute
SMS Service	Mobile Originated (MO)	0.00003 per SMS
SMS Service	Mobile Terminated (MT)	0.00003 per SMS
Data Service	Data Usage	0.0032 per MB
USSD Service	USSD Session	0.00003 per USSD session

These rates represent **reference wholesale ceiling rates** to guide national roaming agreements between operators. Operators may negotiate lower commercial rates where mutually agreed.

The Authority may periodically review these rates based on:

- market developments
- traffic volumes
- technological changes
- competition considerations.

### 3.5 Compliance and Enforcement

Operators are required to comply with the national roaming wholesale rate framework once finalised.

Failure to comply may result in enforcement measures including:

- administrative penalties
- regulatory directives
- other sanctions permitted under Act 775.

Operators shall implement the regulated wholesale roaming rates within **ninety (90) days** following the publication of the final regulatory guidelines.

Existing bilateral roaming agreements shall be amended to comply with the regulated rates within the implementation period.

## CHAPTER 4

### 4.0 CONSULTATION GUIDELINES

The Authority invites comments from stakeholders on the proposed national roaming wholesale rate framework.

#### 4.1 Consultation Questions

Stakeholders are invited to provide views on the following:

1. Do stakeholders agree with the Authority's proposal to introduce benchmark wholesale rates for national roaming services?
2. Is the analytical methodology used by the Authority appropriate?
3. Are the proposed wholesale rates reasonable in relation to prevailing retail tariffs and existing bilateral roaming agreements?
4. Should additional services be included within the national roaming framework?
5. What implementation timeline would be appropriate for migrating existing agreements to the regulated framework?
6. Are additional safeguards required to prevent anti-competitive conduct?

#### 4.2 Consultation Timeline

<b>Activity</b>	<b>Timeline</b>
Publication of Consultation Document	March 2026
Submission of Written Comments	Within 30 days
Stakeholder Engagement Session	Within 45 days
Review of Submissions	Within 60 days
Publication of Final Framework	To be determined after Board approval

# ANNEX 1

## CONSULTATION RESPONSE TEMPLATE

Stakeholders are encouraged to use the template below when submitting comments on the Draft Framework for Regulating National Roaming Wholesale Rates.

Respondents may reproduce the table in their submission and provide responses to the consultation questions or other relevant sections of the document.

Stakeholders may also attach additional documents where necessary to provide further analysis or supporting evidence.

### Respondent Information

Item	Details
Name of Respondent	
Organisation	
Contact Person	
Position/Title	
Email Address	
Telephone Number	
Date of Submission	

### Consultation Response Table

Section of Consultation Document	Consultation Question / Issue	Stakeholder Comment	Supporting Evidence or Analysis	Proposed Alternative (if any)

Respondents should clearly indicate the section of the consultation document to which their comments relate.

Stakeholders may provide any additional comments or observations regarding the proposed framework below.

### Confidentiality of Submissions

Respondents should indicate whether any part of their submission is confidential.

#### Confidentiality Status

- Entire submission is public
- Parts of the submission are confidential

#### Details

Please identify the confidential sections and provide justification

Where confidentiality is claimed, respondents are encouraged to provide a non-confidential version or summary where possible.

### **Submission Instructions**

Completed submissions should be sent to the Authority within the consultation period specified in the consultation document.

Submissions may be sent electronically to the Authority using the contact details provided in the consultation notice.