

Mystery shopping study: Mobile telephony services

MCA Initiative

BEREC – BEUC workshop

15th October 2025



MALTA COMMUNICATIONS AUTHORITY

Regulations in Action

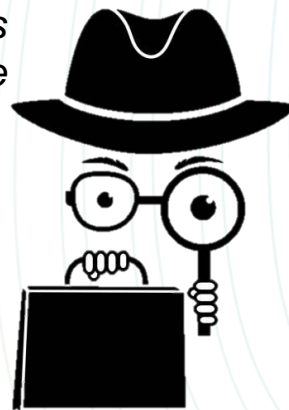
“These are the rules. But are they being followed?”



Regulations in Action

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The MCA used **new powers** provided under Article 29(1)(i) of the MCA Act which empowers the Authority to purchase services under a **cover identity**, *‘to detect infringements of any provisions of this Act or of any other law which the Authority is empowered to enforce, or of any decision taken by the Authority’.*



Background & Scope

- **2023:** MCA conducted mystery shopping by subscribing to mobile post-paid plans from Malta's three main providers. Several compliance gaps were identified and referred for corrective action.
- **2024:** Follow-up study using the same approach assessed whether providers addressed the issues and improved compliance.



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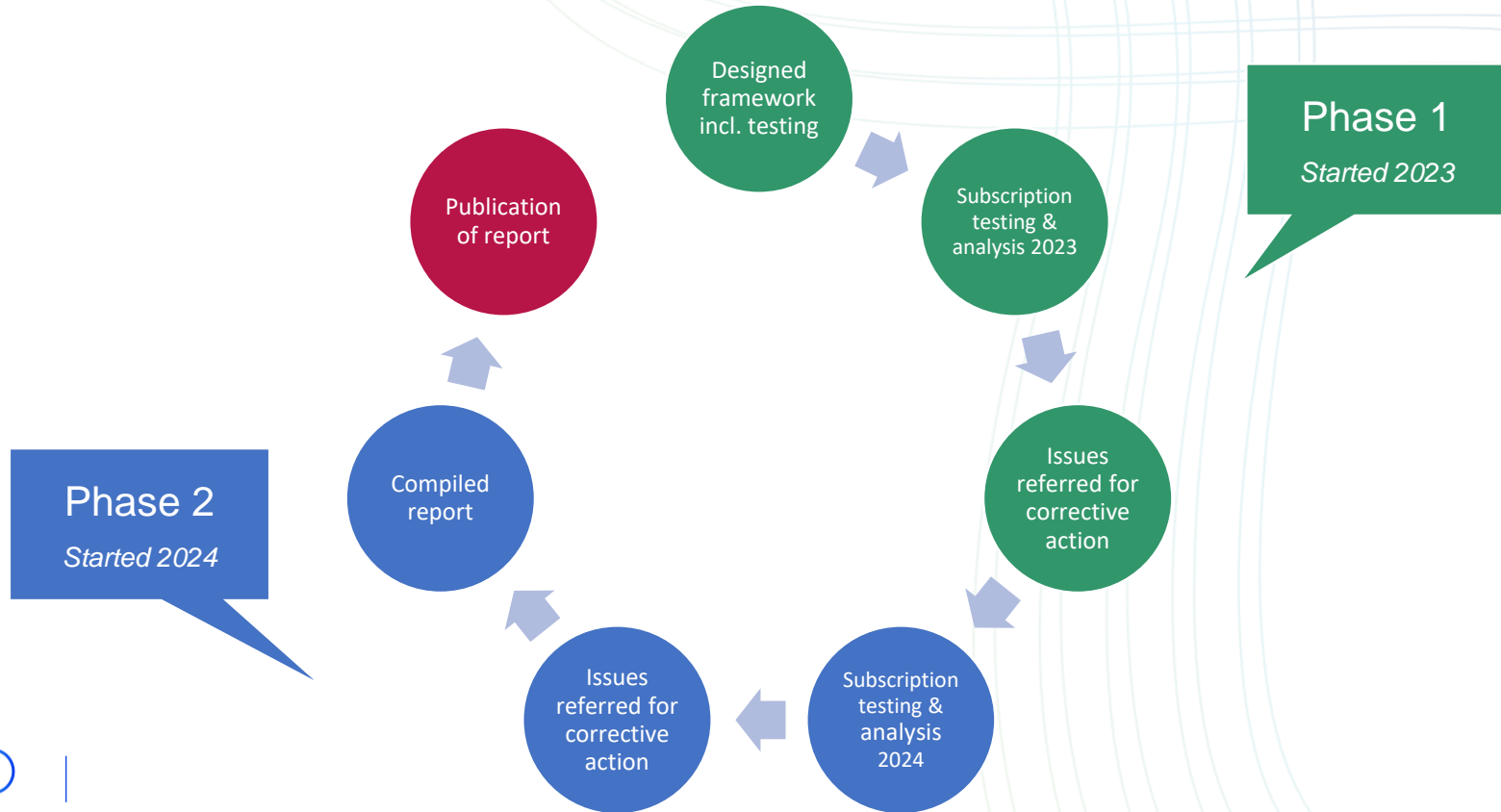
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Key measures tested include:

























- ⌚ Accuracy of information at point of sale
- ⌚ Provision of full contractual documentation
- ⌚ Complete disclosure of contract terms
- ⌚ Contract Signature
- ⌚ Consumer choice on including personal details in directory services
- ⌚ Billing transparency
- ⌚ Termination procedures



Project cycle



Key findings from the 2023 and 2024 Study

	2023	2024
Efficiency of sales support	  	  
Consistency of information provided by the sales team	  	  
Provision of contract summaries and detailed contracts before signing the agreement	  	  
Consent for directory preferences	  	  



Key findings from the 2023 and 2024 Study

	2023	2024
ID verification during subscription	✗ ✗ ✓	✗ ✗ ✓
Transparency in the signing process	✗ ✗ ✓	✗ ✓ ✓
Sending a copy of the signed agreement to the customer	✓ ✓ ✓	✗ ✓ ✓
Completeness of contractual information in the contract summary	✗ ✗ ✗	✓ ✓ ✓



Key findings from the 2023 and 2024 Study

	2023	2024
Completeness of contractual information in the detailed contract	✗ ✗ ✗	✗ ✓ ✓
Easy access to itemised bills	✗ ✗ ✓	✓ ✓ ✓
Efficiency in service termination	✗ ✓ ✓	✗ ✓ ✓
Verification of user ID during service termination	✗ ✓ ✓	✗ ✓ ✓



Collaboration between MCA and Providers



A number of shortcomings were due to non adherence of internal processes.



Providers collaborated with MCA to address the shortcomings identified.



They demonstrated a proactive approach throughout the process.



MCA will continue close collaboration with providers to address any remaining shortcomings.

Other Enhancements Implemented by Providers



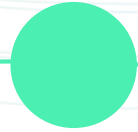
Training & procedures

Customer care teams have been re-trained to improve accuracy and efficiency.



Platform & Contract Upgrades

Online platforms have been enhanced, and contracts updated to include previously missing information.



Process Improvements

Tablets have been introduced in stores to facilitate contract and termination signing, along with new options for terminating services remotely.



Commitment to Compliance

Providers are addressing contractual gaps and updating systems to meet directory services rules.

Conclusions & Lessons Learnt

✓ A report on the findings was published in March 2025



Transparency: The study reinforces MCA's role in safeguarding consumer rights.



Market Impact: It encourages competition beyond pricing, improving service quality.



Consumer Awareness: It helps users understand their rights and provider obligations.



Regulatory Best Practice: This sets a precedent for other sectors to adopt similar tools.



THANK YOU



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